

PLANNING REPORT

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) AT
'HARTFIELD PLACE', SWORDS ROAD, WHITEHALL, CO. DUBLIN

PREPARED BY MCG PLANNING
ON BEHALF OF EW Property Limited

SEPTEMBER 2024

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Introduction

McGill Planning Limited, 9 Pembroke Street Upper, Dublin 2 is instructed by the applicant EW Property Limited, Station Mews, Lindsay Grove, Glasnevin, Dublin 9, to submit this Large-Scale Residential Development Application for an amendment to a permitted SHD in line with Section 32D and 247(7) of the Planning and Development Act 2000 as amended.

EW Property Limited has employed a Design Team for this site to deliver the highest quality development in a timely manner and in line with the Development Plan of Dublin City Council.

Company Name	Documents Prepared
McGill Planning Ltd	Planning Report
	Environmental Impact Assessment Report Addendum
C+W O'Brien Architects	Design Statement
	Housing Quality Assessment
	Building Life Cycle Report
	Architectural Drawings
PUNCH Consulting Engineers	DMURS Statement
	Traffic and Transport Assessment
	Drawings
	Construction and Environmental Management Plan
	Structural Report
JOR	Engineering Services Report
	Drawings
Hydrocare	Flood Risk Assessment
Parkhood Chartered Landscape Architects	Landscape Design Strategy
	Landscape Drawings
JBA Consulting	AA Screening Report
IN2	Daylight, Sunlight and Overshadowing Report
Modelworks	Photomontages
AGL Consulting Geotechnical Engineers	Tunnel Impact Assessment
AWN	Waste and Resource Management Plan
	Operational Waste Management Plan

Please note, that while every effort has been made to ensure consistency throughout the application, inconsistencies may arise due to human error. As such the drawings and documentation created CWOB Architects are the principal documents for the design and layout of the development.

Development Statistics

Development Proposal	Site Statistics for Blocks A to E
No. of Units	334 no. units (an increase of 29 units)
Unit Breakdown	<ul style="list-style-type: none"> • 150 no. 1 beds (44.9%) • 153 no. 2 beds (45.8%) • 31 no. 3 beds (9%)
No. of Blocks (This amendment application)	5 no. blocks
Site Area	2.73 ha (net developable area)
Density (Total Development)	172.89 units per hectare (472 / 2.73ha)
Site Coverage (Total Development)	23.69 %
Plot ratio (Total Development)	1.49
Building Height (Amended Blocks)	<ul style="list-style-type: none"> • Block A: 5 - 8 storeys • Block B: 5 - 6 storeys • Block C: 4 – 6 storeys • Block D: 7 - 8 storeys over semi basement • Block E: 4 – 8 storeys over semi basement
Aspect	<p>55% dual aspect. No single aspect north facing units.</p> <p>(A further 23% achieve light from two aspects but are not “true” dual aspect increasing this total further to 83%)</p> <p>57% dual aspect (total development)</p>
Open Space (This LRD Amendment Application Site)	<p>Public Plaza: 668sq.m</p> <p>Communal: 2,909sq.m</p> <p>(Public Open Space also granted under Parent Permission)</p>
Facilities	<p>Creche (c.399.2 sqm plus 178.7 sq.m outdoor space)</p> <p>Café unit (c. 105 sqm)</p> <p>Residential Amenity Space (c.357 sqm)</p>

Site Description and Context

The subject site is located within Dublin City Council administrative area. The development site is located along the Swords Road (R132), Dublin 9, which provides access, as permitted under Reg Ref 313289-22, to the site. The western side of the site fronts onto the Swords Road. Highfield Hospital is to the immediate south, also fronting onto the Swords Road. There are vacant lands owned by Dublin City Council and Whitehall GAA pitches to the north of the site, facing onto the Swords Road and Collins Avenue. This site has recently been granted permission for residential development under Part 8 on the central portion of this site. Beech Lawn Nursing home is located to the east of the site, accessed from Grace Park Road via High Park.

The subject site is zoned 'Z12 Institutional Land (Future Development Potential)' within Dublin City Development Plan 2022-2028. The objective of this zoning is 'To ensure existing environmental amenities are protected in the predominantly residential future use of these lands'. The subject site is not within an Architectural Conservation Area (ACA) and does not contain any protected structures directly on site.

Swords Road is a wide north-south artery into Dublin City, which features bus corridors and part-segregated cycle lanes. Directly across the Swords Road from the subject site is a strip of neighbourhood level mixed-use shops, retail units, take aways and public house. Similarly, to the north of the site on Collins Avenue, a 5-minute walk, is another neighbourhood level centre for the Whitehall area.



Figure 1 Site Location Map

The subject site is located a 15-minute walk from the main campus of Dublin City University, a major centre of higher education and employment in the area. The nearest large-scale retail and services is 20 minutes walking distance to the northwest in Santry. The Omni Park Shopping Centre and the neighbouring industrial estate are large scale employers in the area.

Port Tunnel

The site formed part of the site compound works for the construction of the Dublin Port Tunnel and the tunnel is located beneath the public open space on the wider permitted site area. None of the proposed blocks to be amended are located within Zone 1 of the Port Tunnel. The alterations in the design of the semi-basement access ramp and the minor changes to the layout of Blocks A to E, including the provision of a semi-basement under blocks D, E and part of the communal open space in place of the basement are considered negligible when compared to the previously granted scheme. A Tunnel Impact Assessment submitted with the application confirms the changes would have minimal effect on the tunnels.

Accessibility

Public Transport

The site is highly accessible and is well served by public transport as it adjoins the Swords Road QBC and proposed Bus Connects spine route. The map below shows the variety of bus services available in the vicinity providing access to the city centre, Dublin Airport, and local centres including Santry, Beaumont and DCU.

The site is well connected to excellent public transport services. Dublin Bus Stops 237, 7851, 214 and 204 are all within c. 100m of the subject site. Bus routes which serve this area are 1, 16, 33, 33E, 41, 41B, 41C, 41D, 44, 16D, 740, 740A and 847. While there are additional buses within a further 5 minutes walk including the 220T and N4. These existing bus routes connect the area to Sandymount, Monkstown, Charlestown, Sandyford Business District, Dundrum, Dublin Airport, Dublin City Centre and Enniskerry.

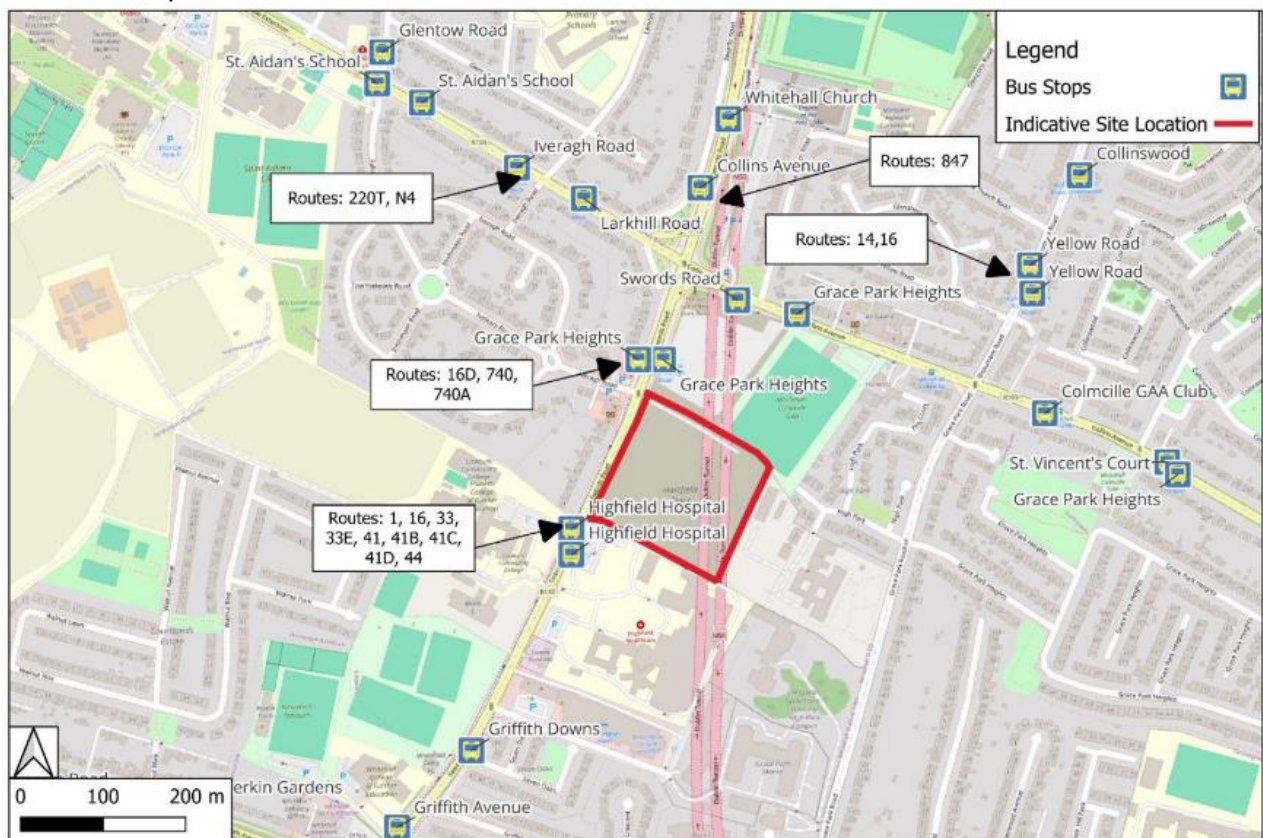


Figure 2 Existing bus routes within the area

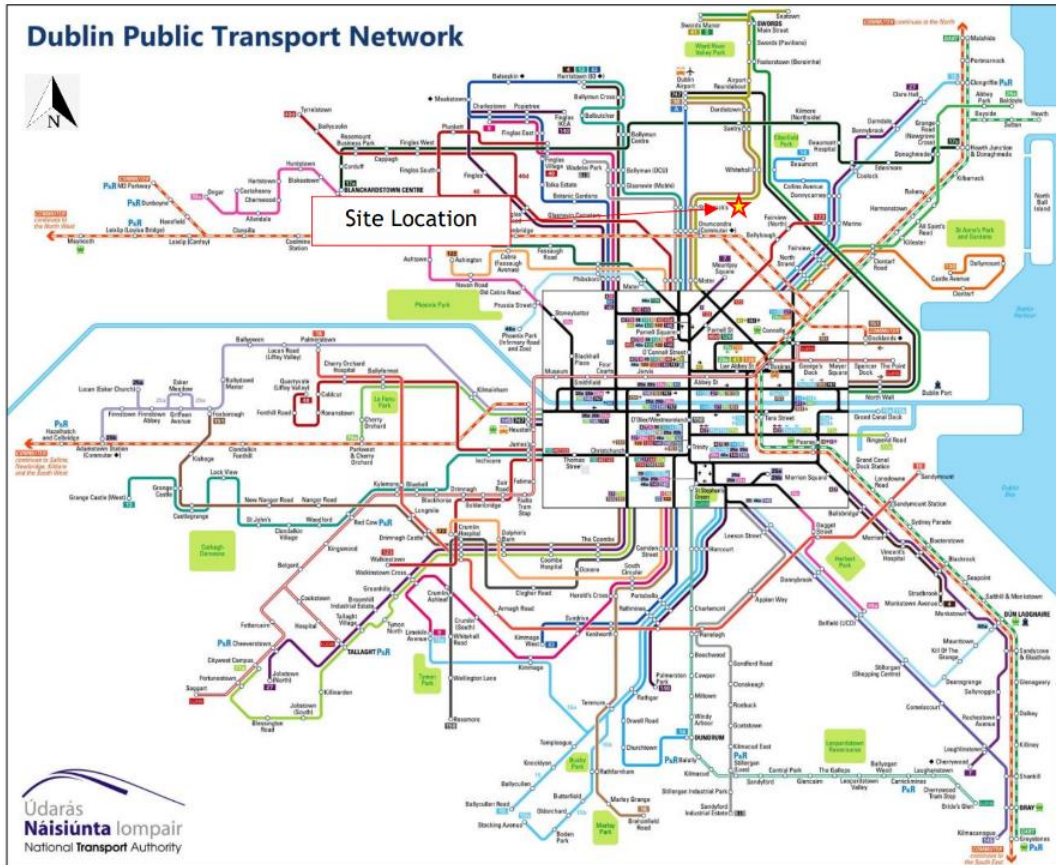


Figure 3 NTA Public Transport Network

The Swords Road interface is to facilitate the Bus connects Spine Route A and cycle lane at this location. The A Route will have services running past the site from Dublin Airport, Swords and Beaumont through the City Centre to Dundrum, Tallaght, Nutgrove and Ballycullen with 10 min frequency. In addition to this spine route the 22 route will also run immediately outside the site and the N4 will continue to run to the north of the site while the N2 will run to the south of the site along Griffith Avenue.



Figure 4 BusConnect Proposed Routes

The scheme will also benefit from the proposed Collins Avenue Metrolink station which is due to be completed in 2027 subject to planning being granted. This metro station will connect Swords to Charlemont which will link the site to Dublin Airport, Irish Rail, DART, Dublin Bus and Luas services.

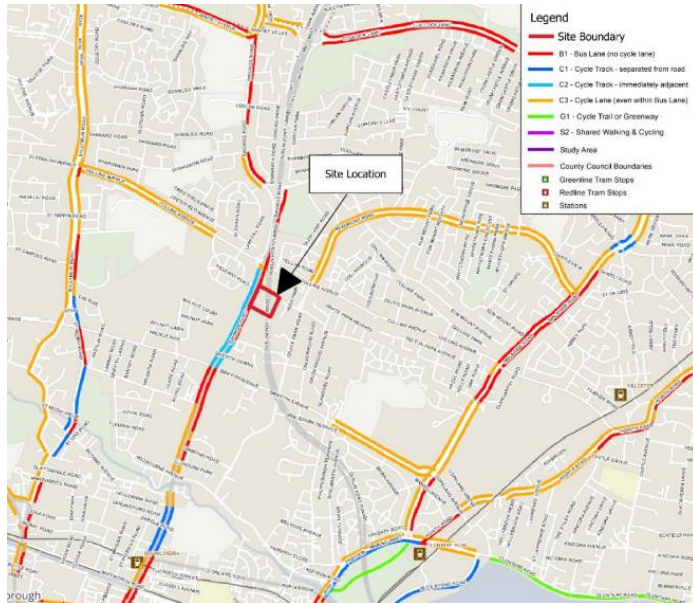


Figure 5 Existing bike routes within the vicinity

The site is located c. 4km away from the city centre which results in a c. 20minute cycles. There are some existing cycle lanes and designated paths for cyclists to use for a journey into the city centre or to DCU. There are proposed improvements agreed between DCC and the NTA including a primary radial route (Swords Road) and orbital routes (Collins Avenue) which are immediately adjacent to this site.



Figure 6 Proposed cycle routes

Planning History

McGill Planning have carried out a review of the planning history of the site. There have been several previously planning applications for residential development since 2010 according to the Dublin City Council website which granted permission for residential development in the form of apartment blocks in a similar layout to the extant permission.

Most recently planning permission was granted in November 2022 Reg. Ref.: ABP 313289-22 (SHD001022) for 472 no. apartments, creche and associated site works. This is the permission which is the subject of this amendment. Construction of Blocks F and G as granted under ABP 313 289-22 is due to commence.

Previously approved planning applications on site are listed below:

DCC Reg. Ref:	3269/10 (as extended) ABP Reg. Ref.: PL29N.238685
Decision:	Granted Permission with 26 conditions
Description:	<p>The development consisted of 358 no. residential units in 7 no. blocks ranging in heights from 4 to 7 storeys, 3 no. retail/commercial units, and a two-storey self-contained creche building.</p> <p>An extension of duration was subsequently granted until 12th February 2022 under Reg Ref 3269/10/X1, which has since been amended to 9th April 2022 because of Covid 19.</p>

DCC Reg. Ref:	DCC Reg. Ref.: 3405/19
Decision:	Granted Permission with 27 conditions
Description:	<p>Permission granted on 19th March 2020 for amendments to PL29N.238685 for increase in overall permitted quantum of apartments to 374 no. units with Block F increasing from 60 no units to 76 no. units. The development involved the rationalisation of the existing floor plans and amendments to the footprint of Block F to increase the no. of apartment units. The height of Block F remained unchanged at 6 storeys.</p>

DCC Reg. Ref:	ABP 313289-22
Decision:	Granted Permission with 26 conditions
Description:	<p>Permission granted on 16th November 2022 for the construction of 472 no. residential units, a creche (c.445.76sqm) and a café unit (c.99sqm) in 7 no. urban blocks ranging in height from 4 to 8 storeys over basement. The apartments comprise 32 no. studios, 198 no. 1-beds, 233 no. 2-beds, and 9 no. 3-beds.</p> <p>This is the permission the subject of this amendment. Condition 3 is of particular note and is set out below. It is a result of this condition requiring the amalgamation of units and the requirement for improved daylight and sunlight levels that this amendment application is proposed.</p> <p>It is important to note this planning condition 3, which when applied to the scheme, reduced the overall number of permitted units from 472 to 443 no. Units.</p> <p>The Construction of Blocks F and G is commencing in May 2024 based on the above permitted SHD scheme and associated conditions which are currently being discharged. These blocks are excluded from this current LRD application.</p>



Figure 7 Reg Ref ABP 313289-22 Permitted Site Layout

Condition 3 of ABP 313289-22)

The proposed development shall be amended as follows:

The following adjoining 1-bed and studio units in Blocks A, B, F and G shall be amalgamated to form 2-bed units.

(a) Block A - Amalgamate Units A1-3 and A1-4 on the First Floor, A1-8 and A1-9 on the Second Floor, A1-13 and A1-14 on the Third Floor, A1-18 and A1-19 on the Fourth Floor and A1-21 and A1-22 on the Fifth Floor.

(b) Block B - Amalgamate Units B1-2 and B1-3 on the Ground Floor, B2-2 and B2-3 on the Ground Floor, B1-6 and B1-7 on the First Floor, B2-7 and B2-8 on the First Floor, B3-12 and B3-13 on the First Floor, B1-10 and B1-11 on the Second Floor, B2-12 and B2-13 on the Second Floor, B1-14 and B1-15 on the Third Floor, B2-17 and B2-18 on the Third Floor, B3-17 and B3-18 on the Third Floor, B1-18 and B1-19 on the Fourth Floor, and B2-22 and B2-23 on the Fourth Floor.

(c) Block F - Amalgamate Units F1-3 and F1-2 on the Ground Floor, F1-8 and F1-9 on the First Floor, F1-14 and F1-15 on Second Floor, F1-20 and F1-21 on the Third Floor, F1-27 and F1-28 on the Fourth Floor, F1-33 and F1-32 on the Fifth Floor

(d) Block G - Amalgamate Units G2-5 and G2-4 on the Ground Floor, G2-10 and G2-11 on the First Floor, G2-17 and G2-16 on the Second Floor, G2-23 and G2-22 on the Third Floor, G2-27 and G2-26 on the Fourth Floor, G2-31 and G2-20 on the Fifth Floor.

(d) Block G - Increase the height and width of the size the north-facing bedroom windows in the following apartments in Block G; G1-6 on the Ground Floor, G1-13 on the First Floor, G1-20 on the Second Floor, G1-27 on the Third Floor, G1-34 on the Fourth Floor and G1-41 on the Fifth Floor.

Revised plans and particulars showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interests of residential amenity including improved access to daylight, proper planning and sustainable development and to safeguard the amenities of the area.

Inspectors Report Findings

An Bord Pleanála Planning Inspectors Report set out within their assessment in section 10 that “A residential development with associated café and creche is permissible in principle and considered to be in accordance with the zoning objectives for the site.”

With regard to the proposed density of 173 units per hectare the Inspector found that “In conclusion, it is my view that the proposed scheme would not result in overdevelopment of the site and that the proposed density is appropriate in this instance having regard to national and regional policy, the area’s changing context, proximity to employment and educational centres, proximity to a wide variety of services and amenities and to public transport. It is also noted that the planning authority raised no objection in principle to the proposed density.”

On Unit Mix the Inspector stated that “it is my opinion, having regard to the information submitted with the application, the planning history of the area, and from carrying out a site visit on the 27th September 2022 that the surrounding area is characterised by low density traditional suburban housing with limited apartment developments. Therefore, it is my view that the provision of studio, 1, 2 and 3 bed apartment units would support the provisions of both Policy QH6 and Policy QH 19 to create attractive mixed-use sustainable neighbourhoods which contain a variety of housing types. Therefore, I have no objection to the proposed unit mix.”

With regard to layout and building height the Inspector set out that:

“It is my opinion that the proposed layout provides a sense of enclosure within the different areas of open space and that an appropriate variety in scale and height of the buildings has been provided, with the tallest buildings located at the centre of the site with a transition in height with the buildings of lower scale site’s southern boundary, which allows for daylight and sunlight to access the areas of open space. It is my view that the layout and orientation of the buildings also provides an appropriate urban edge to the Swords Road.

Concerns are raised by a third parties that the scale of the development is out of character with the surrounding area. While it is acknowledged that this scheme would introduce a new feature in the skyline and change the character of the site from brownfield to residential it is my opinion that the proposed scheme would help to create a distinct character for the site, which would aid with placemaking and legibility. Overall, it is my view that the form, massing and height of the blocks, the relationship between the blocks and the proposed the hierarchy of streets and open spaces results in a high quality and coherent urban scheme that would have a positive impact on the consolidation of

the urban environment and the visual amenities of this area and that the development will make a significant contribution to addressing housing shortage in the city."

"The concerns of the third party that the proposed scheme is out of character with the area is noted. However, it is my view that the design approach is well considered and has regard to the site's urban context. The proposed development would result in the creation of a new high quality distinct urban quarter with wider benefits, such as the delivery of a significant quantum of housing and public open space. The redevelopment of this underutilised site is welcomed and represents a high-quality, contemporary scheme, which includes variety in height and scale that would positively contribute to the streetscape and the consolidation of the urban environment. It is noted that the planning authority raised no concerns regarding the design or layout of the scheme."

"In conclusion, it is my opinion that having regard to the setting of this site with respect to public transport, its size, and in particular the local infrastructure that it is a suitable location for increased height without giving rise to any significant adverse impacts in terms of daylight, sunlight, overlooking or visual impact and represents a reasonable response to its context. The high-quality design would also support the redevelopment of this underutilised brownfield site and the consolidation of the urban area, which is welcomed."

Regarding internal amenity space the Inspector acknowledges at section 10.4.16 that *"this is a build to sell scheme, therefore, there is no requirement for dedicated internal residential amenity space. It is my opinion that the proposed internal residential amenity space, in combination with the high quality external open space, would provide a high level of residential amenity for future occupants."*

It is noted that a condition was applied to the final grant of permission regarding the amalgamation regarding daylight and sunlight concerns. However, the Inspector found it acceptable overall and stated the following:

"In conclusion, while it is noted that the scheme does not achieve all recommended standards, consideration should be given to the fact that the comparison being made is between an existing, under-utilised brownfield site and the proposed development, which will inevitably have some form of an impact. It is considered that this development results in wider planning benefits, such as the delivery of a significant quantum of housing, high quality public open space and the comprehensive development of an underutilised serviced site in the urban area, which would support the consolidation of the urban environment. It is also noted that there is no significant impact on the VSC for existing properties between the proposed scheme and the previously approved scheme. Therefore, the shortfalls outlined above are considered acceptable in this instance."

On considering transportation, car parking and cycle parking it was highlighted the following:

"Swords Road is a regional road with north and south bound dedicated bus lanes. The speed limit along the subject site is 50km/hr. There is a high-quality footpath and cycle network in the immediate vicinity of the site. There are footpaths on both sides of the road and there is a dedicated cycle lane on the western side of the road, which transitions into an on road cycle lane. The site is served by high frequency public transport in the form of bus, with bus stops on both sides of Swords Road within 100m of the site. It is my view that this is a highly accessible urban site within close proximity to a variety of services and amenities."

Having regard to the above, it is my view that the location of the subject site will most likely benefit from improved levels of public transport accessibility / public transport service provision and proximity

to the emerging cycle network. The submission from the NTA also notes that in the medium term, the site will benefit from major transport infrastructural investment.

Having regard to the sites zoning objective, its proximity to the city centre and public transport and overall national, regional, and local policy to consolidate the urban area, it is my view that the potential traffic generated by the proposed development is acceptable in this instance. The submissions from TII, NTA and the planning authority raised no objections to the impact of the proposed development on the capacity of the road network."

Regarding car parking the Inspector notes that the zoning for the site in the Development Plan was considered Zone 3 Outer City. However, he felt that reduced parking was appropriate for the development highlight that *"Section 4.21 of the Apartment Guidelines states in suburban / urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare, planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. Having regard to the site's location within the urban area, its proximity to a variety of public transport modes and proximity to centres of employment and a wide range of services and facilities it is my view, that the proposed level of car parking is in accordance with the standards set out in the Apartment Guidelines."* He also highlighted that the NTA raised that the *"quantum of car sharing spaces could benefit from being more ambitious as a means of encouraging sustainable transport modes for all future occupants. It is my opinion that this could be managed and facilitated by way of the Mobility Management Plan and a specific condition is not required in this regard."*

Regarding the level of cycle provision the Inspector noted that the level was *"significantly in excess of the development plan standards. I have no objection to the proposed quantum of cycle parking proposed."*

How this development responds to these comments

In line with the Inspectors findings, and as a result of condition 3, this proposed amendment has re-examined the internal layout to ensure that the units all have improved sunlight and daylight. This has been achieved as a result of this proposed amendment application.

It is noted that the principle of 472 no. units at a density of 173 uph was accepted in principle, as was the building height, general massing and the layout. They also noted that the permitted development would not impact on the adjacent neighbouring properties and would not have a detrimental impact on the townscape. Therefore, this amendment application has retained all of these principles and has created a more efficient layout resulting in an increase in communal open space at ground floor level and within the plaza which maintaining similar height and massing to the permitted development.

In terms of the reduced car parking, it is noted that a reduced level of parking was considered appropriate to this site when it was classed as Zone 3 Outer Area for parking under the Dublin City Council Development Plan. The Inspector also noted the excellent existing and proposed public transport in the area and as such considered reduced car parking appropriate to this location. However, it was highlighted that the level of car sharing should be more ambitious to enable a further modal shift and reduced car parking. Taking this on board the number of car sharing spaces has increased to 12 no. space. The quality of the cycle parking has also revisited to provide more cargo bikes and alternative forms of cycle parking within the amendment.

This proposed amendment is considered to be fully in accordance with the findings of the Inspector and An Bord Pleanala and provides an enhanced development, that achieves the best and most efficient use of this under-utilised site.

Adjacent sites

The site to the north of the subject application site is owned by Dublin City Council. Permission was granted under Part 8 of the Planning and Development Regulations 2001 (as amended) for 83 no. residential dwellings (41 no. 1 beds, 27 no. 2 beds and 12 no. 3 beds) including two no. 5 storey high blocks of apartments and duplexes. The proposal also included surface car parking providing 48 no. spaces and 178 bicycle spaces and all associated works. The Part 8 documentation also includes a Site Masterplan which provides for a future building fronting onto Swords Road and address the permitted block A on the site the subject of the amendment application.



Figure 8- Part 8 Development Adjacent to Submit Site



Figure 9- Part 8 Development Adjacent to Submit Site

Rationale For Development

Delivering Added Benefits

This site has an extant permission on it which was approved by both Dublin City Council and granted An Bord Pleanála in 2022. This proposed development builds upon this extant permission and delivers additional improvements to enhance the benefits for both the existing community and for the future community of this development. The changes proposed:

- Omission of the basement parking and replacement with a semi-basement under blocks D, E and some of the communal open space.
- Enlarged communal open space with enhanced planting at ground floor level and increased public plaza area.
- Alterations to blocks A to E resulting in a more efficient layout, better living environment and alterations to the creche, retail and amenity provision within the development ensuring optimum layouts are provided.
- Reduced car parking and increased car sharing provision to encourage a modal shift to more sustainable modes of transport
- Quality and type of cycle parking proposed has been improved.

All of these changes have been accommodated within a similar footprint, height, scale and massing compared to the permitted development.



Figure 10 - CGI of Proposed Amendment Application Source: Model Works

Enhanced Communal Open Space

It should be noted that the public open space to the east of blocks A, D and E is not subject to change as part of this application. This will remain as permitted.

Omitting the permitted basement (sited below blocks A to E and the Communal Open Space) and replacing with a smaller semi-basement allows the communal open space to be amended to provide improved landscaping including larger trees, a more undulating, playful area, and with cycle parking and bin stores in the semi-basement hiding these features within the landscape.



Figure 11 -Permitted basement to the left and Proposed basement to the right

It also reduces the level of dig and impermeable areas allowing for environmental benefits in terms of increased permeable areas and less earth works.

This raised area of communal open space also provides level access to Blocks D and E, taking advantage in the slope of the land and burying the semi-basement with this landscaped area. The provision of access to Blocks D and E from the communal space, as opposed to the permitted access route from the public open space to the east, has amended the requirements for fire tender access, resulting in further benefit to the permitted public open space.

The raised communal open space will provide a visual distinction between the public and communal open spaces, providing better definition between the two spaces and also providing an increased sense of security for future occupants of these apartments.

The communal open space at roof level of Block A is proposed to be omitted. This is no longer required due to the ability to provide additional communal open space at the ground floor level. This provides more useable communal open space and more equitable access to all when it is located in this central space, as in all likelihood all users of the communal roof level open space would be the residents of block A. The amended scheme will also extend the permitted plaza to the north of the site with an increase by c. 183sqm.



Figure 12-Landscape Masterplan Source; Parkhood

Sunlight and Daylight

It is noted that Condition 3 of the permitted proposal required the amalgamation of some apartments in Blocks A, B, F and G to improve daylight and sunlight to some apartments. The amalgamation of units by An Bord Pleanála, resulting in a total no. permitted units of 443, were to address concerns regarding daylight and sunlight for those particular units, rather than any density or capacity concerns.

Notwithstanding, this application has re-examined the internal layout of all blocks and in particular Blocks A and B to ensure that there is high levels of daylighting and sunlight achieved within each block. IN2 have prepared a 'Daylight and Sunlight Analysis' report which has been submitted as part of this planning application.

The report includes a daylight analysis that has been undertaken for the kitchen/living/dining (KLD) and bedroom spaces in assessed units. A very high compliance rate of 99% of the rooms, were found in accordance with BRE Guidance representing a significant improvement on the permitted scheme.

The report also includes the results for the Exposure to Sunlight Analysis. This metric assesses the sunlight availability to each unit. A high level of compliance was achieved as 95% of units exceeding the minimum recommendations. The Executive Summary states that:

"In summary, this report confirms that best practices for daylight and sunlight availability have been applied to the proposed amendment to the Hartfield development compared to the parent permission

(SHD ABP 313289-22), achieving a very high 99% compliance rate for internal In summary, this report confirms that best practices for daylight and sunlight availability have been applied to the proposed amendment to the Hartfield development compared to the parent permission (SHD ABP 313289-22), achieving a very high 99% compliance rate for internal daylight availability."

With regards to impacts on neighbouring buildings, as the proposed massing amendments involve only minor adjustments, particularly to those immediately adjacent to existing residential developments, there are no new impacts on the neighbouring dwellings. Therefore, the impact of the amendment application, compared to the permitted scheme has not changed.



Figure 13-Proposed Plaza Area Adjacent to Block A Source; ModelWorks

Unit mix and impact on neighbors

As part of the overall review of the apartments in terms of daylight and sunlight it was established that through the alteration to the internal layout, including the removal of stair cores and the rationalisation of the apartments, it is possible to achieve an additional 29 no. apartment units across blocks A to E. The units can be delivered within apartments blocks which have relatively the same scale and massing as the permitted development ensuring there is not a significant impact on the streetscene when compared to the permitted. Furthermore, as stated above the impact on the surrounding neighbours is also similar to that of the permitted development in terms of daylight.

It is noted that the position of all buildings within the site remains the same as the permitted scheme. As a result, there will be no impact on the adjacent neighbours as the distance to the neighbours remains the same. There is no increase in overlooking or alterations to the privacy impacts, which are minimal, when compared to the permitted development. It does not overlook directly any private open space.

As shown on the tables below, the proposed revised mix is considered to provide significant gains over that permitted by removing all studios and more than tripling the number of 3 bed apartments within Blocks A to E. This unit mix is in accordance with the Development Plan as well as the Apartment Guideline requirements.

In terms of dual aspect, 55% of the units proposed will be dual aspect within blocks A to E. When taken across the entire site including blocks F and G there will be 57% dual aspect. The original proposed development for all blocks A - G had a dual aspect ratio of 55.5%.

It is also noted that 50% of all units will be 10% above the apartment areas required, this includes the 29 additional units.

	Original application	Permitted	Proposed
No. of units	322no. residential units as follows: <ul style="list-style-type: none"> - 20 no. studio (6%) - 106 no. 1-bed (33%) - 187 no. 2-bed (58%) - 9 no. 3-bed (3%) 	305no. residential units as follows: <ul style="list-style-type: none"> - 3 no. studio (1%) - 89 no. 1-bed (29%) - 204 no. 2-bed (67%) - 9 no. 3-bed (3%) 	334 no. residential units as follows: <ul style="list-style-type: none"> - 0 no. studio (0%) - 150 no. 1-bed (45%) - 153 no. 2-bed (46%) - 31 no. 3-bed (9%)

Table 1. Original, Permitted and Proposed Housing Mix (Units A-E)

	Original application	Permitted	Proposed
No. of units	472 no. residential units as follows: <ul style="list-style-type: none"> - 32 no. studio (7%) - 198 no. 1-bed (42%) - 233 no. 2-bed (49%) - 9 no. 3-bed (2%) 	443no. residential units as follows: <ul style="list-style-type: none"> - 3 no. studio (1%) - 169 no. 1-bed (38%) - 262 no. 2-bed (59%) - 9 no. 3-bed (2%) 	472 no. residential units as follows: <ul style="list-style-type: none"> - 0 no. studio (0%) - 230 no. 1-bed (49%) - 211 no. 2-bed (44%) - 31 no. 3-bed (7%) -

Table 2. Original, Permitted and Proposed Housing Mix (Units A-G)

We note that during ABP's assessment of the SHD planning application the Inspector took into account the character of the surrounding area, whereby during their site visit on the 27th September 2022 they found:

"The surrounding area is characterised by low density traditional suburban housing with limited apartment developments. Therefore, it is my view that the provision of studio, 1, 2 and 3 bed apartment units would support the provisions of both Policy QH6 and Policy QH 19 to create attractive mixed-use sustainable neighbourhoods which contain a variety of housing types. Therefore, I have no objection to the proposed unit mix."

The revised housing mix will continue to cater for a wide range of different households at different stages of the life cycle, which we consider fully aligns with Dublin City Council's Development Plan and the opinion of the ABP Inspector. The proposed amendments will introduce a more balanced form of development to this area, appealing to a broad ranging demographic e.g. young families to single professionals and empty nesters. Furthermore, by providing over 3.5 times the number of 3 bed units and through the provision of a creche, this development will appeal to families. Accordingly, this revised unit mix will contribute to sustainable planning goals by accommodating various needs, attracting a broader range of residents.



Figure 14- Proposed Communal Open Space. Source Model Works

Block A

The primary amendments within block A include:

- Reduction in building height by c. 0.52m
- Reduction of 2no. cores to 1no. core
- Reconfiguration of Crèche Space Layout
- Reconfiguration of Communal Amenity Space Layout
- Incorporation of Bicycle Store / Plant Requirements

These amendments have enabled an increase of the permitted café/retail area from 99sqm to 105sqm, the creche has a better, more cohesive layout so while smaller in sqm will accommodate 65 children (63 originally permitted) and will work more efficiently. Furthermore, the amended creche has a larger crèche external play space (+ 60.7sqm) to the east of block is permitted. There is also better separation from the apartment block than in the permitted application.

PLANNING REPORT

'Hartfield Place', Swords Road, Whitehall, Co. Dublin

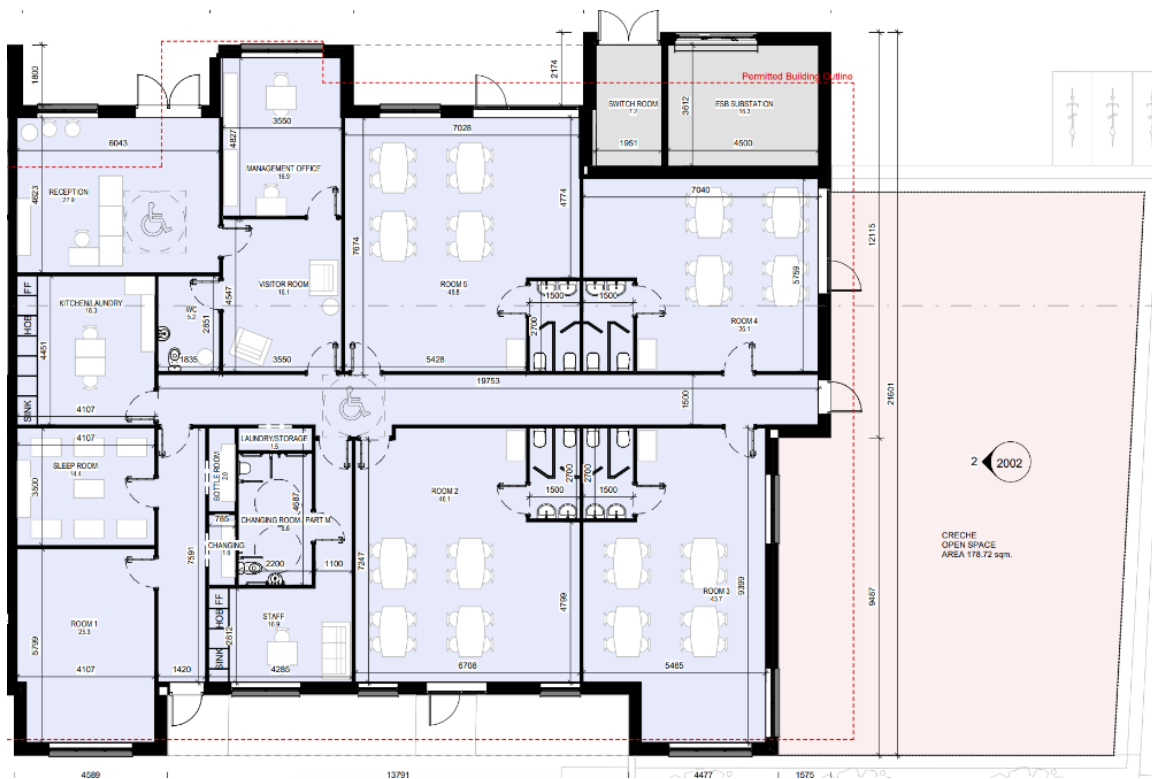


Figure 15 - Proposed Amended Creche Layout

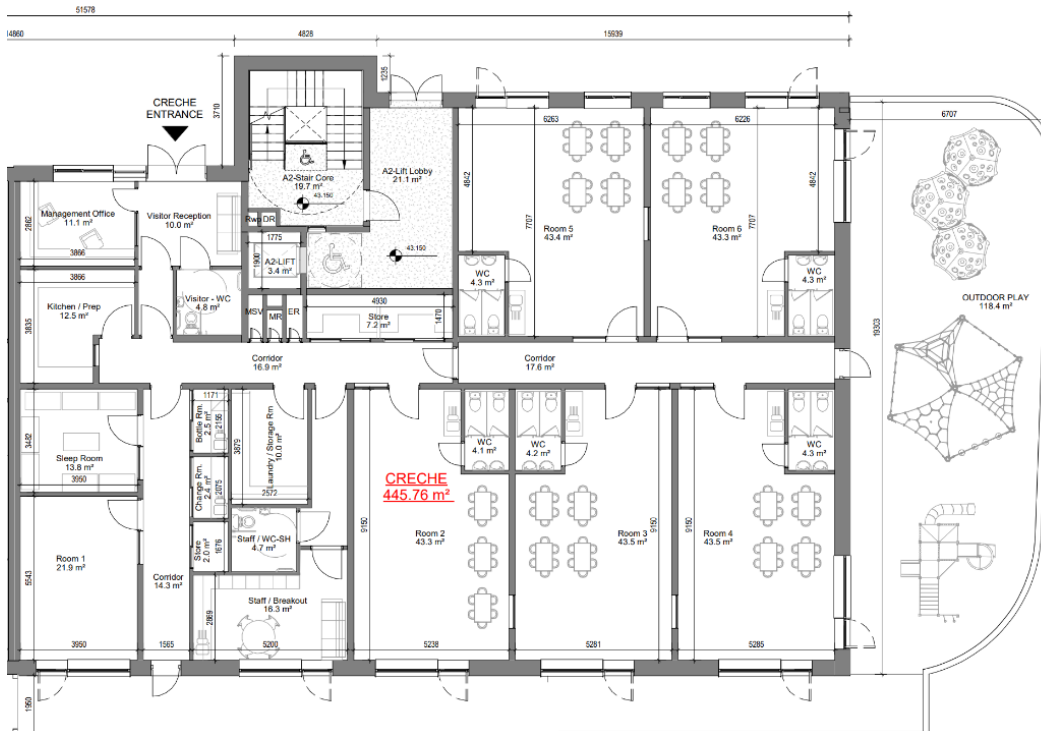


Figure 16 - Permitted Creche Layout

It is noted that the communal internal amenity space proposed has been reduced from gross internal area of 511sqm to 357sqm. This is located at ground and first floor and provides a large gym with changing rooms at first floor along with a reception area and a multifunctional residents lounge at ground floor level. The ground floor internal is immediately beside the proposed café. When

compared to the permitted amenity space, due to the more efficient layout the proposed amenity space is more useable than the permitted amenity space.



Figure 17- Ground floor and first floor proposed internal amenity space in the amendment

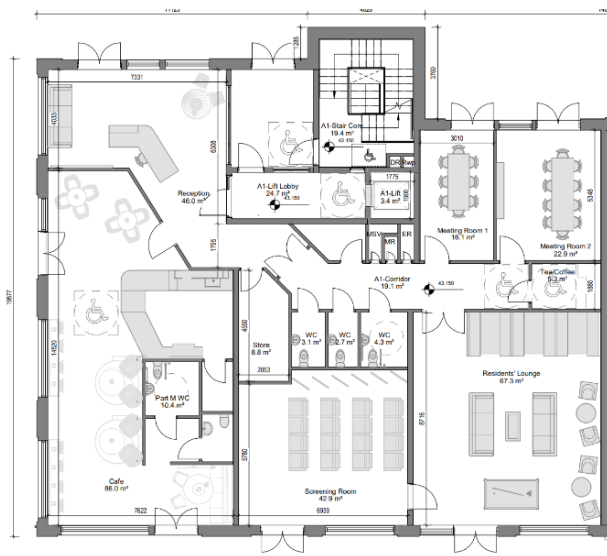


Figure 18- Ground floor permitted amenity space

It is noted that QHSN36 requires “suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.” While policy 15.9.10 states that “Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.” However, a specific square meter target for internal amenity space

Notwithstanding, the reduction in internal communal areas in minor is scale, and the amended scheme is still considered to enhance apartment liveability, inclusivity and services provided to apartment occupants.

In terms of elevational design further enhancements have been made, for example the removal of render, improved articulation of building massing, improved fenestration design allowing enhanced day lighting. The permitted SHD scheme achieved 55% dual aspect for block A, and now block A is

achieving 63% dual aspect, improving the quality of development for residents. The Plaza immediately adjacent to block A is also increasing from 486sqm to 657sqm.

Block B

The primary amendments within block B include:

- Increase in building height by c. 0.17m
- Reduction of 3no. cores to 2no. cores
- Rationalisation of apartment layouts
- Increase in design efficiency of GA plans
- Incorporation of Cycle, Bin and Plant Spaces
- Compliance with Fire Safety Strategy

Through rationalisation of the general arrangements, 5no. new 3 bed units will be provided, allow more choice for choice for future residents. The reduction from two to one core increases internal space efficiency. Rationalised apartment layouts enhance space utilisation and improve liability. In terms of elevational design further enhancements have been made, for example the removal of render, improved fenestration design, improved articulation of building massing, enhanced recessed balcony design. The permitted SHD scheme achieved 62% dual aspect for block B, and now block B is achieving 70% dual aspect, further improving the quality of development for residents.

Block C

The primary amendments within block C include:

- Reduction in building height by c. 0.4m
- Reduction of 2no. cores to 1no. cores
- Rationalisation of apartment layouts
- Incorporation of Cycle, Bin and Plant Spaces
- Increase in design efficiency of General Arrangement plans
- Compliance with Fire Safety Strategy

The primary amendments within Block C offer several advantages, including a slight reduction in building height by 0.4m, which improves visual integration with surrounding structures and reduce overall bulk. The reduction from two to one core increases internal space efficiency. Rationalised apartment layouts enhance space utilisation and improve liability. Incorporating cycle, bin, and plant spaces provides practical, sustainable solutions for residents' needs. An increase in design efficiency in the General Arrangement plans ensures more optimized and functional layouts, while compliance with the Fire Safety Strategy enhances overall safety.

Block D & E

The primary amendments within block D&E include:

- Increase in building heights by c. 1.81m
- 14 new additional 3 bed apartment units
- Reduction of 2no. cores to 1no. cores
- Rationalisation of apartment layouts
- Increase in design efficiency of GA plans
- Compliance with Fire Safety Strategy

Similarly to Block C, the reduction from two to one core increases internal space efficiency. Rationalised apartment layouts enhance space utilisation and improve liability. Incorporating cycle, bin, and plant spaces provides practical, sustainable solutions for residents' needs. An increase in design efficiency in the General Arrangement plans ensures more optimized and functional layouts, while compliance with the Fire Safety Strategy enhances overall safety. By introducing 14no. new additional 3 bed units, it will cater to the growing demand for larger family-friendly homes, attracting a wider demographic, including families or those needing more living space.

The increased building height is minor, and as can be seen from the photomontages and the building proposed, while having an impact on the area. It is important to note that views of these public from public vantage points such as Swords Road and Collins Ave will be screened by units A, B and C, therefore the increased building height will not be readily apparent.

Semi-Basement

The extant scheme had permission for a considerable sized basement, accommodating c. 265 car parking spaces and 732 no. residential cycle parking spaces, spanning below blocks A-E and the communal open space. The proposed amendments include the removal of the permitted basement and replacement with a semi basement under blocks D and E and a portion of the communal open space. This includes alterations to the access route including shortening it and making it less deep. In terms of statistics the permitted SHD basement totalled 10,626sq.m, which will be replaced by a semi-basement with an area c. 3,548sq.m.

The omission of the basement will ensure high-quality development and will bring added environmental benefits including:

- larger area of public open space through the removal of the ramp,
- reduced energy usage, and minimising the overall footprint of the buildings,
- preservation of soil and land, resulting in protection of natural habitat,
- mitigation of construction waste, reduced water usage and reduced construction traffic and,
- decreased risk of contamination.

The replacement of the basement with a reduced semi-basement is considered to be of benefit to the development, the population and human health of the future occupants and wider area. This will reduce the number of truck movements and construction impacts at construction phase. At operational phase it will reduce the cars generated by this development, and will enable a modal shift for future occupants of the scheme, benefitting the occupants and the wider area. It will also result in a benefit to the landscaping of the communal open space between the blocks as there can now be improved planting due to the opportunity to plant in natural ground.



Figure 19- Permitted Basement (left) & Proposed Semi basement (right)

Provision of Cycle Parking

Cycling is to be significantly encouraged as part of the amendment proposal. We anticipate that the majority of cyclists will be travelling south along Swords Road heading towards City Centre, or west to DCU. There is cyclist access therefore from both the north and south of the site.

There is a requirement for 716 no. cycle parking spaces plus 28 cargo/ non standard bicycle parking spaces for this development in line with the Development Plan. This amendment proposal will deliver 829 no. cycle parking spaces, of which 42 no. will be non standard bicycle parking spaces. The 96 no. cycle parking spaces associated with F and G remain as permitted. The overall parking figure across the entire development including F and G is for 925 no. cycle parking spaces.

To accommodate cyclists from the south, a dedicated 4.0m wide shared active travel facility pathway will run to the north and east of block C providing safe, convenient and direct access for cyclists to the bike storage areas at the south of the site. To the south of block C there is also a pedestrian and cyclist access route, with a shared surface to the south, leading to block E, F and G.

Cyclists approaching the site from the north have the option of travelling along Swords Road (directly west of the site) and entering the site via the shared active travel facility, or the shared vehicular access to the north. Cyclists approaching the site from the north should disembark the bikes and walk their chosen bike storage space. Generous space has been provided for residents to disembark their bike and walk alongside any pedestrians using the site.

Please refer to the Car and Cycle Strategy Report (CWOB) which provides further details regarding the provision of cycle parking.

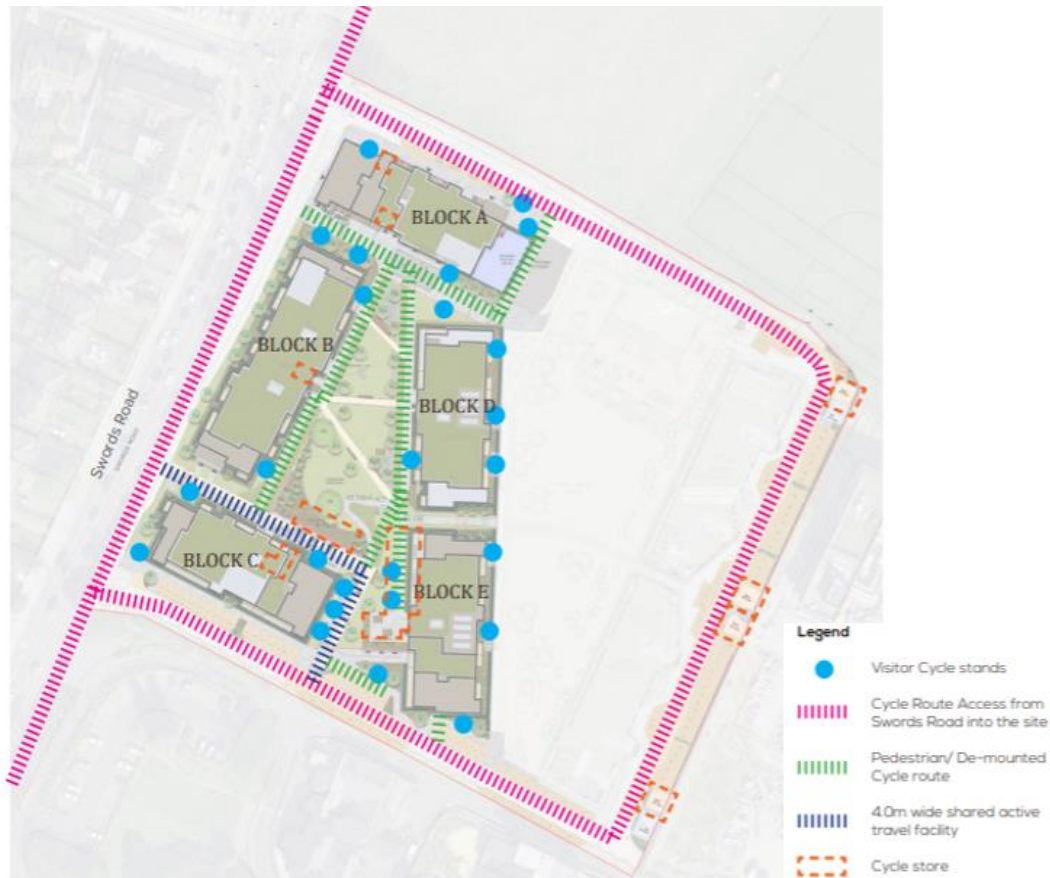


Figure 20- Routes to Cycle parking/storage provision

Block A

The residents bicycle storage is proposed within a dedicated bicycle storage room located at ground floor level of the building adjacent to the primary residential entrance as highlighted on the image below. A total of 96 no. standard bicycle parking spaces are required for Block A residents. 50no of these are located within the ground floor of the block A and the remaining 46 are provided within the bicycle store within the communal courtyard.

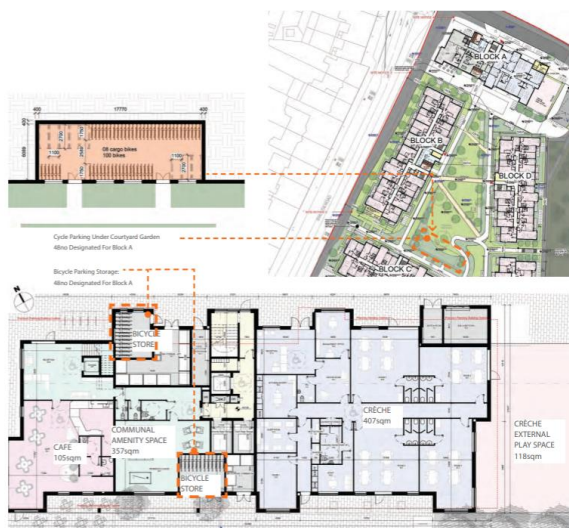


Figure 21- Block A Cycle Parking Provision

Block B

The residents bicycle storage is proposed within a dedicated bicycle storage room located at ground floor level of the building adjacent to a primary residential entrance as illustrated on the image below.

A total of 120 no. standard bicycle parking spaces are required for Block B residents. 36 no. of these are located within the ground floor of the block B and the remaining 43 no. are provided within the bicycle store within the communal courtyard. The remaining 41 are located within the bike store between Block C and Block E.



Figure 22- Block B Cycle Parking Provision

Block C

The residents bicycle storage is proposed within a dedicated bicycle storage room located at ground floor level of the building. The store entry doors are located adjacent to the primary residential entrance as illustrated on the image below.

A total of 82no standard bicycle parking spaces are required for Block C residents. 48no of these are located within the ground floor of block C and the remaining 34 are provided within the bike store between Block C and Block E.

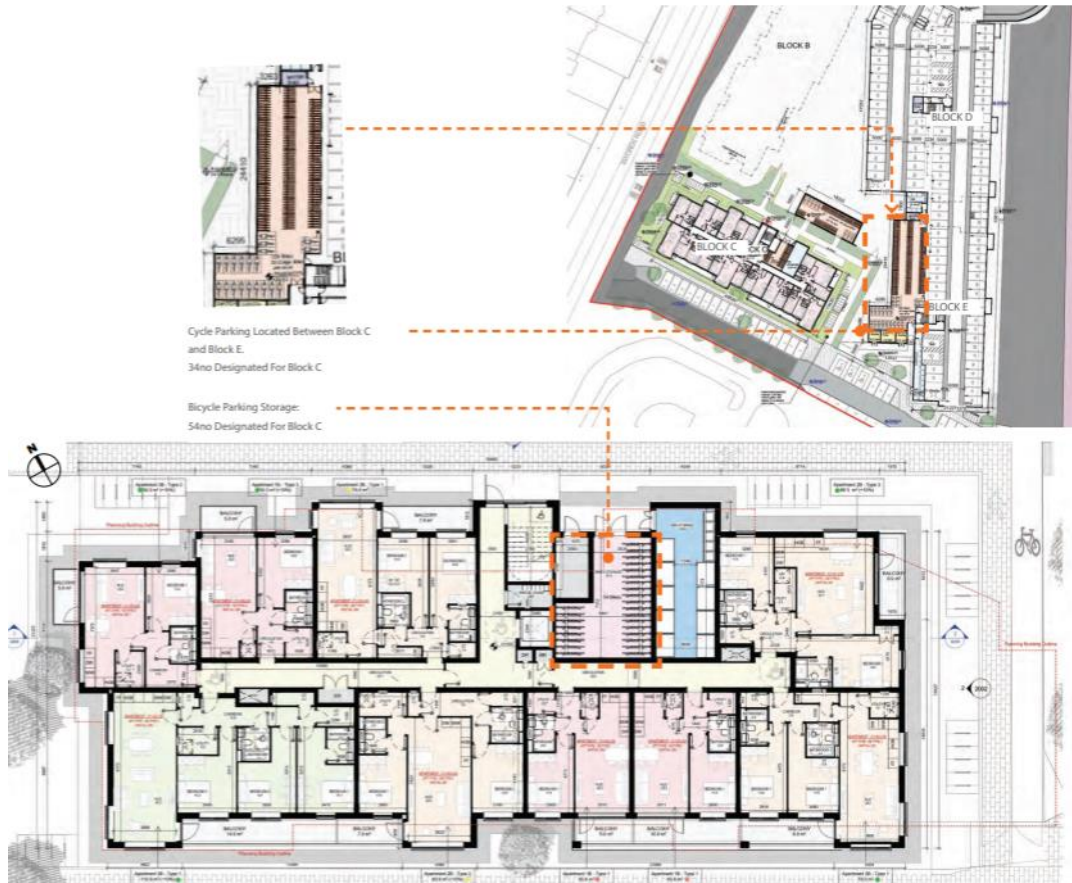


Figure 23- Block C Cycle Parking Provision

Blocks D & E

The residents bicycle storage is proposed within dedicated bicycle storage rooms located within the semi-basement level of the building. The stores can be accessed from entry doors which are accessed directly off the public footpath at the southern end of the semi-basement. (Due to the slopes across the site, the northern end of the semi-basement is mostly buried in the ground while the floor at southern end of the semi-basement is at the same level as the footpath outside). The location of these cycle stores ensure they are easily access by the residents and safe and secure.

A total of 245 no. standard bicycle parking spaces are required for Block D & E residents. All of these are located within the semi-basement of blocks D & E.

The cargo bicycles for Blocks B (partial), C, D and E are located in a dedicated cargo bicycle store which is accessed directly off the southern access routes as illustrated on the adjacent graphic.

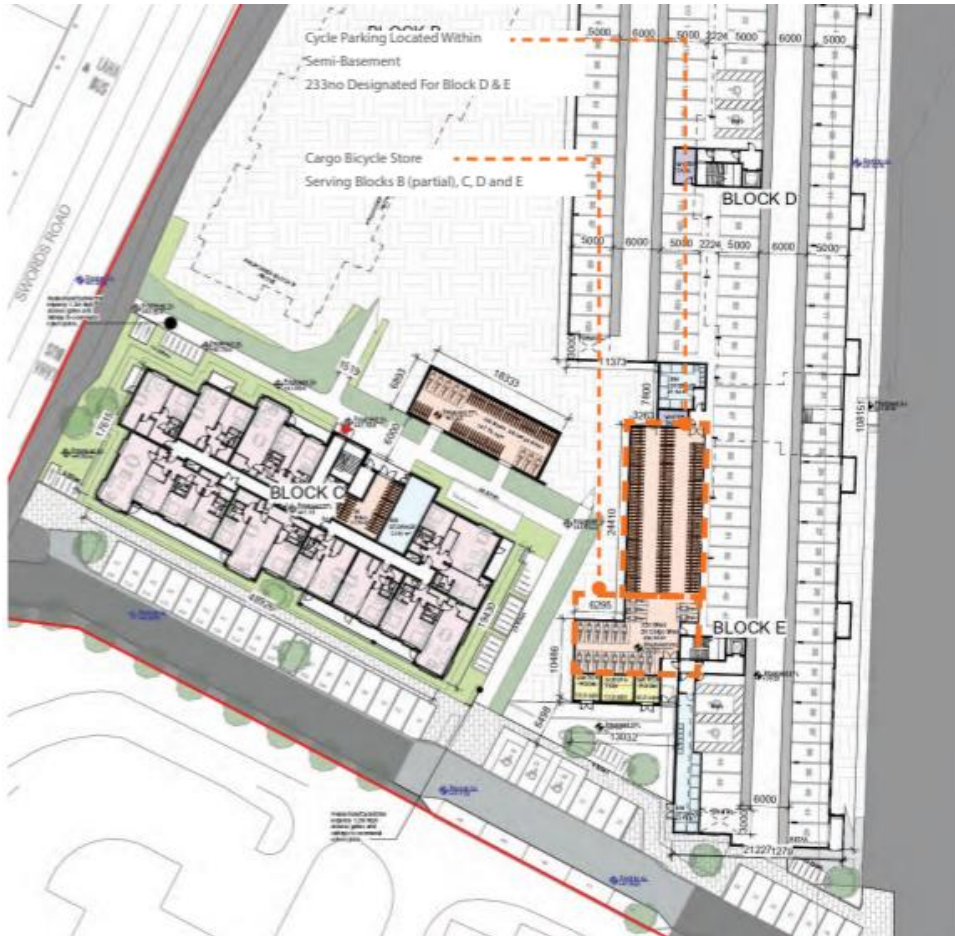


Figure 24- Block D&E Cycle Parking Provision

Block F & G

The residents bicycle storage is proposed within dedicated bicycle secured stores located on grade in front of the buildings. The stores can be accessed from the street which are accessed directly off the public footpath. The location of these cycle stores ensure they are easily access by the residents and safe and secure.

A total of 96 no. standard bicycle parking spaces are permitted for Block F & G residents.

All of these are located on grade in front of blocks F & G.

Note: There cycle parking layout has been rationalised and provide secure and covered cycle parking for the residents of Blocks F & G as per the permitted scheme. The quantum has not changed compared to the permitted.



Figure 25- Block F&G Cycle Parking Provision

Reduction of Carparking Spaces

The permitted scheme provided a total of 265 car parking spaces at basement level (under blocks A-E) and 337 no. car parking spaces in total.

The amended scheme seeks to reduce this total to 217 no. spaces across the entire development including within the new semi-basement and as revised at surface principally adjoining Blocks F & G.

The overall Hartfield Place development, including Blocks F & G, will provide 189 core residential parking spaces for the 472 residential units, which results in a parking ratio of 0.40 spaces per unit. Additionally, 12 additional parking spaces will be reserved for car club use, and 11 additional spaces (5% of the total 212 spaces (189 + 12 + 11)) will be designated for disabled users. For more detailed information, refer to Section 12 of the Punch Consulting Engineers Memorandum on Car Parking Proposals.

The resulting car parking ratio (when car club spaces are included with a parking equivalent of 15 spaces per 1 car shared space) is 78% or 0.78 per apartment (189 + 180 (12 * 15)). Reducing car parking spaces encourages a greater modal shift to alternative modes of transportation such as walking, cycling, or using public transport.

Overall, it is acknowledged that the site is highly accessible, therefore reducing car parking can contribute to more sustainable, equitable, and vibrant urban environments, supporting the well-being of residents, enhancing economic vitality, and addressing pressing environmental challenges. The ABP

Inspector found *"The site is served by high frequency public transport in the form of bus, with bus stops on both sides of Swords Road within 100m of the site. It is my view that this is a highly accessible urban site within close proximity to a variety of services and amenities."*



Figure 26- Car Parking Provision

The provision will reduce traffic loading below that of the permitted scheme and is a reflection of the excellent existing and future public transport connectivity available in the area. Reducing car parking spaces encourages a modal shift to alternative modes of transportation such as walking, cycling, or using public transport. The reduction in car parking spaces aligns with sustainable development goals and promote alternative transportation options as set out in the key national and regional policies and guidelines (including Section 28 Guidelines). For example,

- 'Dublin City Development Plan 2022-2028; (December 2022) *"promote city centre living and reduce the requirement for car parking"*.
- 'Sustainable Urban Housing: Design Standards for New Apartments' (July 2023): *"Car parking provision to be minimised, substantially reduced or wholly eliminated"*.
- 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (January 2024): *"Car parking ratios should be reduced at all urban locations, and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport."*

Census Data

With reference to the existing mode share by trip purpose, data was obtained from the 2022 and 2016 CSO census, Small Area Population Statistics (SAPS) data, and Small Area Population Maps (SAPMAP) as presented within Chapter 2 of the Punch 'Memorandum' that accompanies this cover letter.

As illustrated in the Tables below, in 2016, approximately 38% of the population aged 5 years and over travelled to work, school, or college using a car or van. By 2022, this percentage had decreased to around 33%. This shift indicates a move away from the use of private cars and vans within this Small Area Catchment. A similar trend is observed within the slightly larger Electoral Division catchment that this site falls within.

Another important finding is the significant increase in the percentage of individuals working mainly from home. In 2016, less than 1% of the Small Area catchment fell into this category, by 2022, this figure had risen to 15%. While this increase could be somewhat attributed to the impact of COVID-19 and resultant changes in work patterns, it is noteworthy that around 15% of respondents were in fact working mainly from home.

These findings highlight significant shifts in travel behaviour and work patterns over the period analysed, reflecting broader societal changes and their impacts on local transport and commuting habits. Accordingly lower parking ratio is considered appropriate within this site context.

Population aged 5 years and over by means of travel to work, school or college						
	Work		School, College or childcare		Total	
Means of travel	No.	%	No.	%	No.	%
On foot	9	19.83	40	61.64	49	34
Bicycle	15		5		20	
Bus, minibus or coach	28	16.53	12	17.81	40	21.78
Train, DART or LUAS	3		1		4	
Motorcycle or scooter	0	0.00	0	0.00	0	0.00
Car driver	60	58.68	4	12.33	64	38.12
Car passenger	3		5		8	
Van	5		0		5	
Other	0	4.96	0	8.22	0	5.94
Work mainly at or from home	1		0		1	
Not stated	5		6		11	
Total	129	100.00	73	100.00	202	100.00

Figure 27- Small Area (A268160001) CSO Data for 2016

Population aged 5 years and over by means of travel to work, school or college						
	Work		School, College or childcare		Total	
Means of travel	No.	%	No.	%	No.	%
On foot	18	17.22	20	36.07	38	22.64
Bicycle	8		2		10	
Bus, minibus or coach	36	23.84	2	4.92	38	18.40
Train, DART or LUAS	0		1		1	
Motorcycle or scooter	0	0.00	0	0.00	0	0.00
Car driver	40	33.11	8	31.15	48	32.55
Car passenger	5		11		16	
Van	5		0		5	
Other	0	25.83	0	27.87	0	26.42
Work mainly at or from home	23		0		23	
Not stated	16		17		33	
Total	151	100.00	61	100.00	212	100.00

Figure 28 - Small Area (A268160001) CSO Data for 2022

Parking Zone 2:

We note that during the assessment of the SHD planning application, as per the Dublin City Development Plan 2016-2022, the subject site fell within Zone 3, whereby section 16.38 of the Plan states that *"parking is an integral element of overall land-use and transportation policy within the city, and the purpose of the parking standards set out in Tables 16.1 and 16.2 is to ensure that an appropriate level of parking is provided to serve new development."*

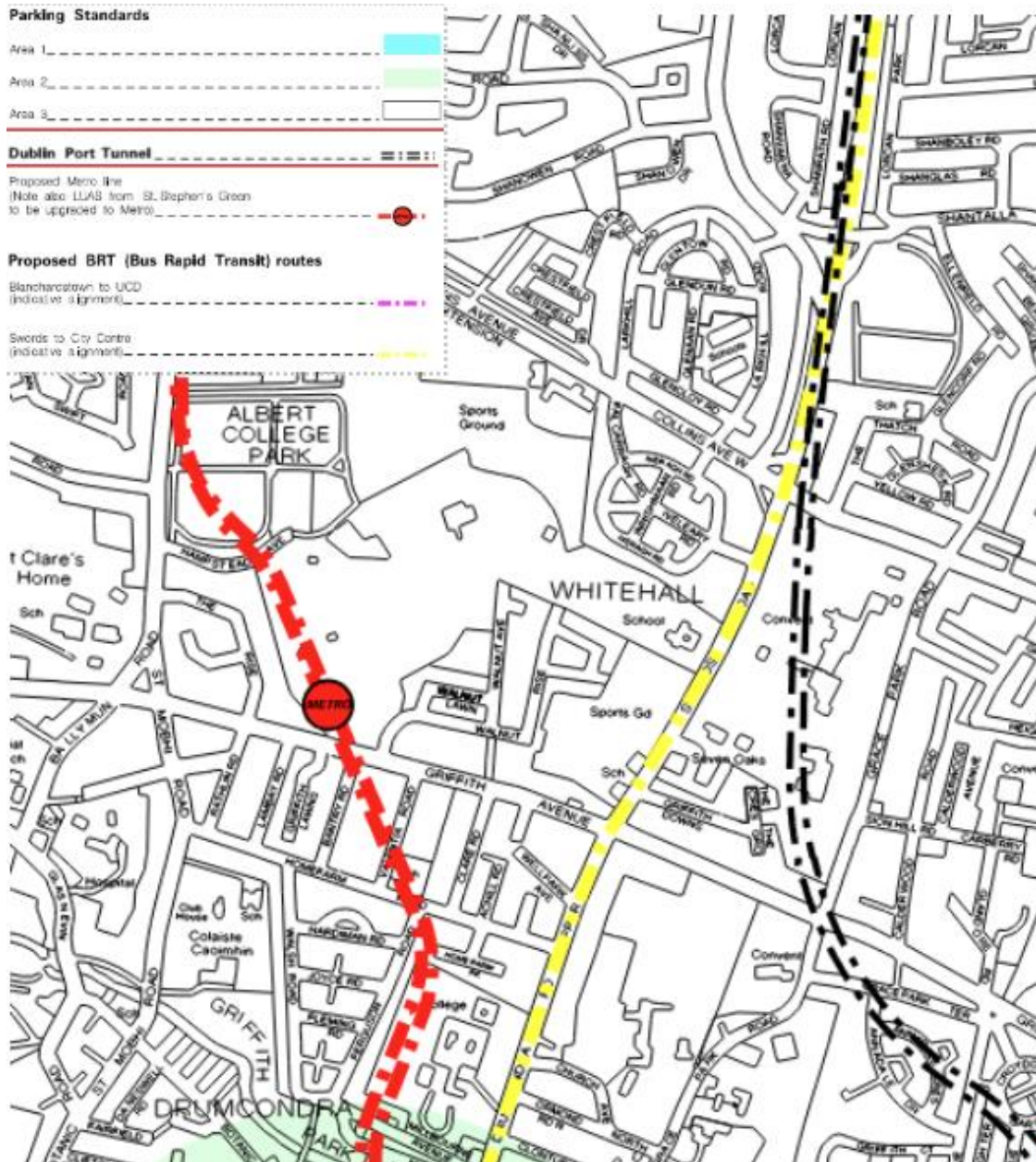


Figure 29 - Parking Zone 3 as per Dublin City Development Plan 2016-22

Since the adoption of the Current City Development Plan, as per Map J, the subject site falls within Parking Zone 2, which are areas “alongside key public transport routes”. It is important to note that the current Development Plan, allows for “a relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location. Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development”.



Figure 30 - Parking Zone 2 as per Dublin City Development Plan 2022-28

This relaxation is subject to a number of criteria, such as proximity to High Frequency Public Transport services (10 minutes' walk), walking and cycling accessibility/permeability and any improvement to same and locational suitability and advantages of the site amongst others. Full details set out table below.

Criteria	Response
Location suitability and advantages of the site	The site is located on an existing QBC and will have the benefit of a Bus Connect Route. It is also within c.15 minutes cycle of Dublin City Centre and is within c.15 minutes walk of DCU, c.30 minutes walk of Beaumont Hospital.
Proximity to High Frequency Public Transport services (10 minutes' walk)	The site is within 300m of approximately 13 different bus stops serving over 25 different bus routes. The no. 16 is a high frequency route operating every 10 min in the peak period. These routes will be further improved as a result of BusConnects. In addition to this the new cross city Metrolink is within c. 28 minutes of the site.
Walking and cycling accessibility/ permeability and any improvement to same.	As part of the BusConnects network it is proposed to improve cycle routes throughout Dublin. Currently the site has the benefit of a cycle route along the Swords Road.

	As set out above there are excellent pedestrian links existing within the area. This will be further improved through the delivery of the permitted cross road junction granted under SHD 313289-22.
The range of services and sources of employment available within walking distance of the development.	As set out above there is a wide range of existing services surrounding the site including neighbourhood centres, schools, GAA pitches and parks. In addition to this the site is within walking distance of DCU and Beaumont Hospital which are significant employers in the area. Further afield, Dublin City Centre is within a 15 minute cycle of the site.
Availability of shared mobility	The proposal will provide 12 no. car sharing vehicles which is over double the 5 no. in the permitted scheme. This not only benefits the future occupants of the development but also the wider area. This is the equivalent of 180 car on site. It is also noted that this can be monitored via the Mobility Management Plan and increased as appropriate, if there is additional demand.
Impact on the amenities of surrounding properties or areas including overspill parking.	<p>The proposed amendment will reduce the potential impact of the development by reducing the number of proposed car parking/storage on site and create a modal shift towards more sustainable forms of transport. This will reduce any potential load on the Swords Road compared to that permitted.</p> <p>To accommodate those who would like access to a car on occasion the number of car share spaces have been tripled. This has the advantage of enabling people have access to cars without the expense.</p> <p>To avoid any potential overspill all future occupants will be made aware of the restriction on car parking on the site and the availability of alternative options including bus, cycle and pedestrian routes, as well as car share options. These will be set out clearly in a mobility management plan and also as part of a residents pack.</p>
Impact on traffic safety including obstruction of other road users	The permitted development, due to the permitted upgrades on the Swords Road will improve the current situation. It is considered this will provide additional safety not only to cars but also other more vulnerable road users including pedestrians and cyclists.

Robustness of Mobility Management Plan to support the development	As set out in the MMP by Punch Consulting Engineers the proposed amendment will enable a shift in modal preferences towards more sustainable transport options. This MMP also includes clear car parking management strategy. This will be treated as a "living" document and will be updated as BusConnect, the Metrolink and other improvements are delivered in the area.
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With reference to the supporting documentation prepared by Punch Engineers, it is our view that a strong justification for reduced car parking provision at Hartfield Place LRD. Please refer to the accompanying 'Traffic and Transport Assessment', 'Mobility Management Plan' and 'Cycle Strategy Report' for further details and illustration of the sustainable development proposals.

Consultation with the Local Planning Authority

A S247 Meeting was held on the 20th May 2024 with Dublin City Council regarding this proposed Large Scale Residential Development to amend the permitted ABP 313289-22. As a result of this meeting, along with follow up consultation with Dublin City Council, a Determination was issued on the 16th September 2024, under Section 247(7) of the Planning and Development Act 2000 as amended that

"The Planning Authority has compared the proposed development to the permitted development, and considered whether the –

- a) The proposed development is substantially the same as the permitted development, and*
- b) The nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.*

The Planning Authority has determined that no further consultation is required under Section 247 in relation to the proposed development.

This determination is based on plans and particulars received by the Planning Authority on the 20/5/2024, the 7/6/24, the 3/7/24 and the 31/7/24.

In accordance with Section 247(8) of the Act, a determination under subsection 247(7) shall not prejudice the performance by the Planning Authority of its functions under this Act or any regulations under the Planning and Development Act 2000-2022 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings."

A letter confirming same is included in Appendix A of this Planning Report.

It is noted that the following items were raised at the S247 Meeting. The responses to those are also set out in the table below.

Items Raised	Applicant Response
<p><u>Car Parking</u></p> <p><i>Reduction in car parking from 0.68 to 0.28 has been led by</i></p> <p style="padding-left: 40px;"><i>a public Transport Capacity Study, change as a result of policy including Compact Settlement Guidelines</i></p> <p style="padding-left: 40px;"><i>Increase in car sharing 5 to 17 spaces</i></p> <p><i>Transport section states that 0.28 spaces not acceptable, specific zonings for this suburban site not city centre site. Suggest further justification including census data/ transport capacity study / experience of other sites.</i></p> <p><i>Need bicycle design statement and management plan for how it functions including 5% cargo bikes in revised scheme.</i></p>	<p>Parking has been revised to now provide a total of 217 spaces. Of these 189 will be core residential parking spaces for the 472 residential units, which results in a parking ratio of 0.40 spaces per unit. Additionally, 12 additional parking spaces will be reserved for car club use, and 11 additional spaces (5% of the total 212 spaces (189 + 12 + 11)) will be designated for disabled users.</p> <p>The resulting car parking ratio (when car club spaces are included with a parking equivalent of 15 spaces per 1 car shared space) is 78% or 0.78 per apartment (189 + 180 (12 * 15)).</p> <p>Reduced car parking has significant gains for the development and is fully in line with the rezoning of this site in the DCC Development Plan from Zone 3 to Zone 2 which reduces the maximum requirement for car parking due to access to existing public transport and services. The Compact Guidelines, in line with National</p>

	<p>Planning Policy Guidance generally, further encourages a reduced parking ratio. To accommodate these an increase in car sharing spaces has doubled up to 12 spaces and will be monitored and can be further increased if there is a demand.</p> <p>A justification is included with this application including a Public Transport Capacity Study, along with the TIA and Mobility Management Plans which examine Census data for the area which indicate that car usage in the area is between 33-37%. Therefore the ratio of 0.4 spaces per residential unit (excluded car club) is higher than the car usage for this area.</p> <p>Cycle parking has been revisited and provides 829 which is in excess of the 716 no. cycle spaces required for Block A-E. Of those provided there are more varied in types, including 5% non standard bike space, and therefore there is also an improvement in the quality of the spaces. The spaces provided are all in line with the NTA Cycle Design Manual.</p>
<p><u>Drainage and civils</u> <i>Some of drainage has already been constructed, but they would like to see minor changes including SuDs, green roofs</i></p> <p><i>A Basement Impact Assessment is required for the changes.</i></p> <p><i>Taking in Charge – where is to?</i></p>	<p>Please see the Engineering Report which is submitted with this application. This includes SuDS measures such as Green Roofs, Podium Green Areas, Landscaping, Permeable paving, Tree pits, and filter drawings/ infiltration strips. This has been agreed with DCC Engineering Department.</p> <p>A Basement Impact Assessment is included with the application.</p> <p>None of the site is proposed to be Taken in Charge.</p>
<p><u>Planning</u> <i>CU025 – noted that there is a new development plan but acknowledged that the gross floor space of the amendment is less than the floorspace that triggers this policy. Further clarity should be provided.</i></p>	<p>It is contended that Policy CU025 does not apply to this amendment application. This policy requires: “All new regeneration areas (SDRAs) and large scale developments above 10,000 sq.m. in total area* must provide at a minimum for 5% community, arts and culture spaces including exhibition performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage.”</p> <p>This is an amendment application to blocks A- E of a permitted development. This is not a new development. These amendments are a result of</p>

	<p>an internal layout review to accommodate condition 3 of the permitted SHD ABP 313289-22. This review has resulted in revised internal layouts, including the omission of the stairs, and a rationalisation of the apartments, enabling the delivery of an additional 29 no. apartment units.</p> <p>Equally we note that DCC have not applied this policy to other amendment applications. We refer to the following examples:</p> <p><u>DCC Reg Ref: LRD6039/23-S3</u></p> <p>This is a permitted LRD permission. The proposed development was granted permission under Strategic Housing Development Reg. Ref. ABP-307656-20 and subsequently amended by ABP-312262-21, was most recently amended via S247(7) agreement by DCC Reg. Ref. LRD6029/23-S3 This included alterations to unit mix, and alterations to cycle provision. We note the following two paragraphs from the DCC Planners Report: <i>"The policies and objectives and standards of the recently-adopted City Development Plan 2022 –2028 will not be applied to the permitted units (not shown to be amended as part of this current application) as they have the benefit of permission and to reassess the entire permitted scheme under the current development plan would not be appropriate..."</i></p> <p><i>For the purposes of clarity, those adopted standards in the 2022 – 2028 Dublin City Development Plan pertaining to larger scale schemes will not be applied to this proposal such as Climate Action Energy Statement; Community Safety Strategy; 5% Community and Art Spaces etc., as the proposal is for changes to apartment unit types and associated amendments only."</i></p> <p><u>DCC Reg Ref: LRD6047/23-S3</u></p> <p>Griffin Point, Clarehall Avenue is a permitted LRD permission. The proposed development was granted permission for two sets of amendments to the previously approved Strategic Housing Development granted under ABP Ref. 310944-21. These included alterations to the unit mix and an uplift in unit numbers. The DCC Planners Report takes a similar approach, and the scheme was not assessed against the</p>
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	<p>Policy CU025 or other policies such as the Climate Action Energy Statement.</p> <p>This is considered in line with section 34 (3C)(b) of the Planning and Development Act, 2000 as amended which states: <i>"on foot of an application in accordance with section 32A, the planning authority concerned shall, notwithstanding section 34(2)(a), be restricted in its determination of the application, other than in respect of any assessment of the effects of the proposed development on the environment, to considering the modifications proposed by the applicant to the previously permitted development and for the purposes of determining such an application the reference in subsection (6) to "the development concerned" shall be read as a reference to "the modifications to the previously permitted development"</i>.</p> <p>In the interest of planning consistency, and in line with the Act, this is an amendment proposal to a permitted SHD. We submit that the application of CU025 does not apply in this instance.</p>
<p><u>Parks</u></p> <p><i>The layout is similar as previous apartments scheme permitted and has play space provision for younger child, green roofs for biodiversity.</i></p> <p><i>The omission of the basement is better for mature trees.</i></p> <p><i>The public open will remain as permitted.</i></p> <p><i>Communal open space should have sheltered seating spaces.</i></p>	<p>Confirmed that the layout and positioning of the buildings is similar to that of the permitted scheme.</p> <p>Noted re the omission of the basement and as such this area includes an appropriate tree selection.</p> <p>Confirmed that the proposal does not alter the primary open space from the extant permission.</p> <p>Please see the Parkhood Landscape Pack which confirms sheltered communal seating.</p>
<ol style="list-style-type: none"> <i>1. Open space arrangement is broadly similar to extant permission , however there is an increase in POS provision.</i> <i>2. Location and design approach of bicycle store building partially below ground level in communal open space is generally supported. The inclusion of a connecting dedicated bike path to the public road should be assessed to minimise conflicts with general path users. Detailed cross section from Block</i> 	<p>This is confirmed. The Plaza will be c. 171sqm larger than permitted. Taking the entire site as a whole the POS will increase from 6,165sqm to 6,334sqm of 23.16% of the entire site.</p> <p>Noted. Please see the Car and Cycle Strategy in the CWOB Design Statement and pages 16 and 17 of the ParkHood Landscape Design Statement which include bike paths and routes within the development. These routes are wide enough to prevent any conflict with other users.</p>

<p><i>C northwards to storage building shall be provided.</i></p> <p>3. <i>COS with normal ground soil conditions may support large canopy tree species and a few should be included.</i></p> <p>4. <i>Sheltered seating areas and play spaces, in particular for younger age group shall be included in COS.</i></p> <p>5. <i>COS calculations indicate an adequate provision of COS for the application.</i></p> <p>6. <i>Green roof shall include biodiverse plant species.</i></p>	<p>Please see page 15 of the Car and Cycle Strategy Report for detailed cross sections of Block C and the adjacent cycle parking.</p> <p>Large canopy trees have been introduced within the COS as key locations.</p> <p>Sheltered seating is included within the COS. Natural play is provided within the COS providing play opportunities for younger children.</p> <p>Please see page 15 of the Park Hood Landscape Design Statement for the COS Calculations. It is noted that there is a requirement for c. 2,100sqm for blocks A to E and 2,906sqm across the entire site. The proposed development, as amended, will deliver 3,386sqm which is in excess of the requirement and also is an increase of 183sqm compared to the permitted development. It is also noted that this is predominantly at ground floor level with only two rather than 3 roof top gardens ensuring access for all. (The two remaining roof top gardens are on the permitted F and G which remain unchanged.)</p> <p>A Sedum Planting mix is proposed for the green roofs.</p>
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Statement of Consistency (Planning Policy Review)

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

National and Regional Planning Policy

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

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Guidelines for Planning Authorities on Urban Development and Building Heights (2018);*
- *Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments (2023, 2022 and 2020);*
- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;*
- *Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Quality Housing for Sustainable Communities (2007);*
- *Design Manual for Urban Roads and Streets (2013);*
- *Guidelines for Planning Authorities on Childcare Facilities (2001);*
- *Smarter Travel – A New Transport Policy for Ireland (2009-2020);*
- *The Planning System and Flood Risk Management (2009).*

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

The National Planning Framework (NPF) is the Government's plan to cater for the extra one million people that is anticipated to be living in Ireland within the next 20 years. The Eastern and Midland Region (including Dublin) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today.

The NPF Strategy includes the following planning aims to guide the delivery of this growth:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.

Overall, the NPF seeks to avoid continued, untrammelled urban sprawl of our cities into greenfield areas. Compact Urban Growth is the NPF mantra, "*making better use of under-utilised land and buildings, ... with higher housing and jobs densities, better serviced by existing facilities and public transport.*"

This approach not only makes better use of serviced zoned land, but it can also have a "*transformational difference*" to urban locations bringing new life and footfall to areas and

contributing to the viability of services, shops and public transport, increasing the housing supply, and enabling more people *“to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less”* (section 2.6).

The NPF enables a flexible approach to planning policies and standards requiring developments to be ***“focusing on design led and performance-based outcomes, rather than specifying absolute requirements in all cases... planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.”***

In particular Section 4.5 highlights that ***“general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.”*** It highlights that there ***“should also generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs of all five.”***

The NPF also states that that *“to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas”*. Key National Policy Objectives (NPOs) outlined in the NPF which are directly relevant to this site and development proposal are set out below:

National Policy Objective	Evaluation of Consistency
National Policy Objective 2a <i>A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.</i>	The proposed development is an amendment to a permitted apartment development. The amendment will provide an addition 29 no. homes above the permitted quantum within the existing built-up footprint of the Dublin.
National Policy Objective 3a <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements</i>	
National Policy Objective 4 <i>Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i>	The proposed amendment development will create a high-quality, attractive, and liveable place for residents. The proposal includes varied open spaces which will contribute to the high quality of life for residents.
National Policy Objective 6 <i>Regeneration and rejuvenate cities, towns and villages of all types of scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.</i>	The proposed development provides a café unit, creche and 334 no. residential units which will positively contribute towards increased population and employment activity in the surrounding area. This is an increase of 29 no. units.
National Policy Objective 11 <i>In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within</i>	The proposal is located within Dublin suburbs. The site is highly accessible and is well connected with public transport services. A high frequency bus service is within a short walk from the site.

<i>existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</i>	
<p>National Policy Objective 13 <i>In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected</i></p>	<p>The proposed amendment application has a similar scale and massing to the permitted. It remains as a development which is up to 8 storeys in height, as permitted.</p> <p>The reduction in car parking in this location as a result of this amendment is compliant with this policy seeking reduced car parking standards in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height and car parking ratio is in line with government guidance and emerging trends for sustainable residential developments.</p>
<p>National Policy Objective 27 <i>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.</i></p>	<p>Walking and cycling are prioritised throughout the scheme with minimal vehicular access into the scheme and a high quality public realm.</p> <p>A reduction in car parking spaces ensures public realm is placed at the forefront of this scheme. A larger quantity of bicycle spaces are supplied to ensure a modal shift to a more sustainable mode of transport.</p>
<p>National Policy Objective 32 <i>To target the delivery of 550,000 additional households to 2040</i></p>	<p>This proposal will provide 334 no. residential units in this sustainable location within Dublin City's metropolitan area.</p>
<p>National Policy Objective 33 <i>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</i></p>	<p>The proposed scale of development is considered appropriate for this location.</p>
<p>National Policy Objective 34 <i>Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time</i></p>	<p>All of the apartments will be fully adaptable.</p>
<p>National Policy Objective 35 <i>Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</i></p>	<p>The proposed apartment blocks will increase the residential density of this highly sustainable area.</p>

EVALUATION OF CONSISTENCY

The subject site is located within a well-established suburban area of Dublin City which is identified for significant residential growth over the next two decades.

The proposed amendment development seeks to deliver an additional 29 units within this permitted apartment development, resulting in a total of 472 no. units within the development. This amendment is appropriate given that the site is located within a well-established inner suburban location of the city within walking distance of a multitude of services, exceptional public transport options and very good local amenities. The proposed apartment development is considered in line with the Governments guidance for compact city development and ensures sustainable development in this well serviced urban area.

The site is within c. 1.25km of Omni Shopping Centre which serves as the commercial hub for the area with a range of shops, takeaways and restaurants. Neighbourhood centres also exist within the surrounding area of the subject site. The Swords Road neighbourhood centre fronts the scheme while Collins Avenue neighbourhood centre is c. 300m from the site. Shantalla Road and Swords Road (Santry) centres are within 1km of the subject site. Artane Castle Shopping Centre is c. 2km west of the subject site. There is a range of existing schools and community facilities in the area. It is c. 3.5 km north of Dublin City Centre.

In addition to the public space provided within the scheme the site is located within walking distance from a range of public parks including Ellenfield Park (c. 400m) and Courtsland Park (c. 600m) with additional parks in the wider area.

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

Noted. The permitted buildings ranges from 4 to 8 stories, with modest increases proposed to buildings B, D and E increasing by approx. 0.17m, 1.81m & 1.81m respectively. The proposed scheme ranges from 4-8 stories.

The increased building height is minor, and as can be seen from the photomontages and the building proposed, while having an impact on the area, will still have a positive impact, improving the street scene. There is a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building height is in line with government guidance and emerging trends for sustainable residential developments.

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

Housing for All – A New Housing Plan for Ireland

Housing for All is the government's most recent plan for housing in Ireland. It was published in September 2021 with the overall aim that *'everyone in the State should have access to a home to*

purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life'. It includes four overarching objectives

- Supporting Homeownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock.

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

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

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

EVALUATION OF CONSISTENCY

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

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

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

The Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. There is now a presumption in favour of increased building height in appropriate urban locations with good public transport services.

SPPR 1 of the Guidelines state the following:

In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

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

Section 3.1 of the Guidelines go on to state:

In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Section	Evaluation of consistency
<i>Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?</i>	The proposed amendment development seeks to deliver a additional residential development within the permitted development, within a scale and massing which is similar to the permitted scheme. This level of development, as permitted and proposed is appropriate along with the reduced car parking given that the site is highly accessible in terms of public transport.
<i>Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?</i>	The proposed development has good connectivity with existing and proposed high frequency transport corridors that will reduce the commute times. The site is located on the Swords Road QBC which is served by high-frequency bus routes.
<i>Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?</i>	This development is considered to be inline with the Development Plan which encourages increased heights and density subject to meeting the criteria set out in Appendices. The proposed height is similar to that of the permitted scheme with only blocks D and E increase significantly to accommodate the semi-basement. There is also excellent pedestrian and cyclist links with the adjoining urban areas.

SPPR 3 of the Guidelines state:

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

The Development Management criteria are assessed in greater detail below:

Development Management Criteria	Evaluation of Consistency
At the Scale of the Town	
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	<p>The proposed development is located along the Swords QBC which is served by high-frequency bus routes both at peak and off-peak hours. Therefore an increase number of units and reduced car parking as proposed is in line with this policy.</p> <p>There is a proposed Bus Connects along Swords Road which will further improve the public transport in the area.</p>
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks and protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	<p>The proposed development will amend the previously permitted scheme which is currently under construction.</p> <p>Both the permitted scheme and this proposed development were designed to integrate into the existing area while also staying in accordance with the Whitehall Framework Plan prepared for the site.</p> <p>Modelworks have completed the verified views and CGI's for the site. These provide a realistic view of what the development will look like once it is completed.</p>
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	<p>The proposed development will provide, similar to the permitted, a strong urban frontage to Swords Avenue and Collins Avenue.</p> <p>The proposal will not alter the permitted large public open space and will increase the size of the public plaza which will provide a positive addition to the public realm and spaces in the area.</p>
At the Scale of the Neighbourhood	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	<p>The proposal responds to the natural and built environment by providing increased building heights at this strategic site</p> <p>The permitted development responds to the need for open space in the area by providing a large public open space with a MUGA within the scheme.</p>
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	The apartment blocks, as permitted, have been positioned to avoid long uninterrupted walls of building. They layout, scale and massing of the proposed is similar to that of the permitted. The proposed variety of building heights will also add visual interest and break up the mass of the buildings.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The	The permitted proposal includes a large public open space that has been carefully designed with soft landscaping and a MUGA in line with the Development Plan. The public open space has also been designed to connect with the future public open space to the north as identified in the Whitehall Framework Plan.

Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).	
Makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The proposed development has clear pedestrian routes through the site which are framed by the proposed blocks and which will connect with the wider area and improve the overall connectivity and legibility of the area.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The scheme contributes to the overall sustainable mix of residential types in the Whitehall area.
At the scale of site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light	The proposed development is set out in seven urban blocks. The orientation of these blocks ensures that the proposed apartment units and open spaces will receive adequate daylight and sunlight.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’	Please refer to the IN2 report ‘Daylight and Sunlight Analysis’ which has been submitted as part of this planning application.
Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	<p>Section 4 of the report outlines the results of the assessed amenity spaces of the proposed amendment in accordance with the BRE Guide. The proposed amenity space was predicted to receive excellent overall sunlight availability, as 94% and 90% of the amenity space were determined to receive at least 2 hours of sunlight on 21st March, which is well above the recommended 50%.</p> <p>All proposed amendments are internal to the site, and therefore there is no change to the impact on neighbours as per the permitted scheme. The impact of the proposed amendment on neighbouring buildings is discussed in Section 5 of the report.</p> <p>Section 6 of the report includes daylight analysis that has been undertaken for the kitchen/living/dining (KLD) and bedroom spaces in assessed units.</p> <p>All rooms were assessed for the Spatial Daylight Autonomy (SDA) methodology as detailed in the BRE Guide. A very high compliance rate of 99% of the rooms, were found to be compliant for BRE Guide recommendation and detailed results are presented in Appendix A. This represents a significant improvement on the permitted scheme as discussed in section 6.2.</p> <p>As per the Apartment Guidelines, in cases where rooms were determined not to comply with the BRE Guide (totalling 13 rooms), these have been identified, and compensatory measures are provided in Appendix A.</p>

	<p>Section 7 of the report included the results for the Exposure to Sunlight Analysis. This metric assesses the sunlight availability to each unit. A high level of compliance was achieved as 95% of units exceeding the minimum recommendations.</p> <p>In summary, this report confirms that best practices for daylight and sunlight availability have been applied to the proposed amendment to the Hartfield development compared to the parent permission (SHD ABP 313289-22), achieving a very high 99% compliance rate for internal daylight availability.</p>
Specific Assessments	
Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	The proposed heights and layout is the similar to the permitted and therefore will not cause any impacts on the microclimate.
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	Please refer the Biodiversity Chapter within the EIAR Addendum Report.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	The proposed heights and layout is the similar to the permitted and therefore will not cause any impacts on the telecommunications network.
An assessment that the proposal maintains safe air navigation.	The proposed heights and layout is the similar to the permitted and therefore will not cause any impacts on air navigation.
An urban design statement including, as appropriate, impact on the historic built environment.	Please see the Design Statement prepared by CWOB Architects and Modelworks have completed the verified views and CGI's for the site. These provide a realistic view of what the development will look like once it is completed. This demonstrates that the proposed amended development will have a similar impact on the landscape to the permitted development.
Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.	<p>Please refer to the letter prepared by JBA Consulting which concluded:</p> <p><i>"On the basis of the screening exercise carried out above, it can be concluded that the possibility of any likely significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available."</i></p>

	<p>Please refer to the AA Screening for further details.</p> <p>Please refer to EIAR Addendum Report which accompanies this application and includes a Biodiversity section.</p>
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We note the following compliances with the SPPRs of the Guidelines:

Specific Planning Policy Requirement	Evaluation of Consistency
<p>SPPR 1</p> <p>In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.</p>	<p>The site is located along the Swords Road QBC which is served by high frequency bus routes into the city centre. The proposed bus connects corridor along the road will increase the capacity of public transport. Therefore, the site represents an "Accessible Urban Location" as defined in Section 2.4 of the Sustainable Urban Housing: Design Standards for New Apartments (2023) and is suitable for higher density apartment development.</p> <p>There are currently two frequent bus services (Nos. 1 and 16) that operate along the Swords Road QBC and have a frequency of every 10-12 minutes.</p>
<p>SPPR 2</p> <p>In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities</p>	<p>The proposed development will provide additional apartments above that of the permitted scheme in this area, which is predominantly traditional housing, increasing the housing type choice in the area. It also seeks to provide for a mixed tenure type development with private and social housing. Furthermore, there will be a mix of residential uses within the development itself including residential amenity facilities. This will all add to the variety and mix of the development as well as creating active frontage and animation.</p>
<p>SPPR 3</p> <p>It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p>	<p>The proposal is in accordance with the Development Management Criteria as set out in the table above.</p> <p>This proposal is in accordance with the national and regional guidance as fully detailed in the Statement of Consistency that forms part of this Planning Report.</p>

Evaluation of Consistency

The subject development seeks to provide for additional apartments within 5 blocks which are permitted under SHD 313289. The scale, mass and layout remains similar to the permitted development. It is a suburban brownfield infill site within the highly accessible location of Whitehall. It is considered that the subject site is an appropriate site for additional apartments, while maintaining the permitted building height of up to 8 storeys. The proposal responds to its overall natural and built environment providing a transition from the building heights of the neighbouring context and it makes a positive contribution to the urban area.

The materials and finishes of the proposed blocks will be designed to a high architectural standard. The materials and finishes have also been considered with regard to the surrounding existing pattern of development and material pallet in the locality.

The proposed development, as with the permitted, from 4 to 8 stories but with modest increases in height proposed to buildings B, D and E increasing by approx. 0.17m, 1.81m & 1.81m respectively. The increased building height is minor, and as can be seen from the photomontages and the building proposed, while having an impact on the area, will still have a positive impact, improving the street scene.

Guidelines For Planning Authorities on Sustainable Residential Development In Urban Areas, 2009

The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas. These are assessed against the proposed scheme as follows:

POLICY	EVALUATION OF CONSISTENCY
<i>Prioritise walking, cycling and public transport, and minimise the need to use cars;</i>	Pedestrian and cyclist access, as permitted and in the proposed amendment, to the site has been prioritised with minimal vehicular access to the site. Please see the Traffic Impact Assessment prepared by PUNCH enclosed with this application.
<i>Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;</i>	The amendment proposal has been designed in accordance with all relevant quantitative and qualitative residential standards as set down in the Dublin City Development Plan. Future residents will live in a uniquely safe residential environment with outdoor space largely free of cars and a multitude of access options to social infrastructure, open spaces and public transport in the area.
<i>Provide a good range of community and support facilities, where and</i>	The development will consist of apartments with residential facilities. It also provides a new public open space, café, creche and a large dedicate communal open space.

<i>when they are needed and that are easily accessible;</i>	The development is well located in relation to existing/planned social infrastructure in the area with schools, creches, and local retail within 5-10 minutes' walk.
<i>Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;</i>	The layout of development has been designed to continue to enable accessibility of the site. All of the routes through the development will provide increased connectivity to the area which is well surveilled and overlooked.
<i>Are easy to access for all and to find one's way around;</i>	
<i>Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;</i>	The layout is conducive to wayfinding and provides pedestrian and cycle links through the site. There is one vehicle access into the site off the Swords Road to the west which also provides cyclist and pedestrian access. Two additional cyclist and pedestrian access points via the Swords Road will be located to the north and south of block C to the south east of the site, as well as access to the public plaza to the south of block A.
<i>Provide a mix of land uses to minimise transport demand;</i>	<p>The site benefits from extant permission for residential development, creche, café, residential facilities, and public open space.</p> <p>The scheme is within walking distance of a number of high quality bus services and local employment centres.</p>
<i>Promote social integration and provide accommodation for a diverse range of household types and age groups;</i>	A range of unit sizes is proposed for the scheme omit any studios replacing them with 1, 2 and 3 bedroom apartments. This will improve the overall mix in the wider area which comprises mainly larger 3+ bed houses at present. This mix will cater to the needs of first-time buyers, starter homes for small families, couples and the elderly.
<i>Enhance and protect the green infrastructure and biodiversity; and</i>	The site comprises a vacant brownfield site that was previously as a compound for the port tunnel. The proposal will result in a significant improvement in the landscaping, planting and biodiversity on site as a result of the amendment and the omission of the basement carpark and replacement with a semi-basement. This will allow for larger trees to be planted in the Communal Open Space Area.
<i>Enhance and protect the built and natural heritage.</i>	The proposed development does not have any protected structures on the site, nor are there any in the immediate vicinity. Equally the site is not located within or adjacent an Architectural Conservation Area (ACA) or zone of archaeological potential.

Urban Design Manual – A Best Practice Guide, 2009

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

1. Context –How does the development respond to its surroundings?	
	EVALUATION OF CONSISTENCY
<i>The development seems to have evolved naturally as part of its surroundings.</i>	<p>The site is located within a brownfield infill site which has an extant permission due to commence later this year. It is distinct from adjoining properties and land uses. There is a mixture of uses within the area, however, the predominant one is residential.</p> <p>The site benefits from extant permission and the amendment represents a unique opportunity to deliver a significant residential development in a well-established, well serviced and highly accessible suburban location within the city.</p>
<i>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</i>	<p>The proposed density, which is a minor increase over the permitted, is in accordance with National planning policy which encourages site to make the best use of zoned land.</p>
<i>Form, architecture and landscaping have been informed by the development's place and time.</i>	<p>The density has been achieved though the provision of a strong urban frontage to Swords Road and the proposed open spaces.</p> <p>The proposal reflects the significant increases in densities and scale achieved along high quality public transport corridors such as Dublin Bus Routes.</p> <p>The proposed development also reflects national policy for consolidated urban development and higher densities and scale on accessible and well serviced urban sites throughout Dublin City as promoted in the NPF and the RSES.</p> <p>The site is large and unique in its context and has remained undeveloped for some time. The site is of an appropriate size and design to facilitate the scale and layout proposed.</p>

<i>The development positively contributes to the character and identity of the neighbourhood.</i>	<p>The proposal is an improvement on the permitted scheme, making a more efficient use of the buildings and alterations to the materials improving the design and layout which optimise this large infill site and will enhance and develop the character of this residential area.</p> <p>It will remove a vacant, underutilised site and transform it with a development that will contribute positively to the neighbourhood in terms of increased population and wider, more sustainable residential mix.</p>
<i>Appropriate responses are made to the nature of specific boundary conditions.</i>	The proposed amendment is in line with the permitted development in terms of layout.
2. Connections – How well connected is the new development	
	EVALUATION OF CONSISTENCY
<i>There are attractive routes in and out for pedestrians and cyclists.</i>	The site is accessed directly off the Swords Road which has comprehensive pedestrian, cyclist and bus infrastructure. Future residents will therefore have full opportunity to utilise sustainable transport modes to get to work and services.
<i>The development is located in or close to a mixed-use centre.</i>	There are a number of local centres within 5 minutes' walk of the site provide a range of daily convenience services. The site is also within 1.25km of the District Omni Park Shopping Centre, which is anchored by Tesco, and includes Lidl and over 100 other stores.
<i>The development's layout makes it easy for a bus to serve the scheme.</i>	The site is located adjacent the Swords Road Quality Bus Corridor which is served by a large number of Dublin Bus and regional bus services providing access to the city centre, Dublin Airport, and local centres including Santry, Beaumont and DCU.
<i>The layout links to existing movement routes and the places people will want to get to.</i>	The layout provides dedicated and safe pedestrian/cyclist permeability that connects with the surrounding streets and services and facilities.
<i>Appropriate density, dependent on location, helps support efficient public transport.</i>	The density accords with national guidelines which promote higher density development in established residential areas close to high quality public transport and local services.
3. Inclusivity – How easily can people use and access the development?	
	EVALUATION OF CONSISTENCY

<i>New homes meet the aspirations of a range of people and households.</i>	New apartments will meet the needs of a wide range of future occupants from first time buyers, families with children and downsizers. The range of housing typologies and quality of internal spaces and private open space and communal spaces will fulfil the requirements of all future residents.
<i>Design and layout enable easy access by all.</i>	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations.
<i>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</i>	The permitted SHD permission provides a significant new public open space of over 0.5ha which will be available to the wider community and will include a MUGA. In addition, the development will be served by dedicated communal open space include, roof gardens and 657m ² plaza. The recreational needs for a range of different ages including children, adults and the elderly will be facilitated.
<i>Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.</i>	The public realm will be accessible to all. Public, private and semi-private areas will be defined by soft and hard landscaping treatments. We refer to Parkhood landscape drawings for more information.
<i>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</i>	The layout presents attractive urban edges to the open spaces proposed that will be supervised and overlooked.
4. Variety – How does the development promote a good mix of activities?	
	EVALUATION OF CONSISTENCY
<i>Activities generated by the development contribute to the quality of life in its locality.</i>	The proposal will provide for an improved housing mix within the wider area and will increase population creating additional demand for educational, sports and retail services all of which are provided close to the development.
<i>Uses that attract the most people are in the most accessible places.</i>	The creche, café and public open space are all easily accessible to residents and the public.
<i>Neighbouring uses and activities are compatible with each other.</i>	<p>The area is characterised by residential uses with a residential use already extant on site. Accordingly, this amendment application, is compatible with the surrounding area.</p> <p>The Whitehall GAA club is located north of the site. The proposed public open space will provide a nearby area for recreation and will complement the GAA club.</p>

<i>Housing types and tenure add to the choice available in the area.</i>	A variety of apartments are provided which will further improve the range of unit types in the area available to various household types.
<i>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</i>	<p>The local area is well provided for in terms of social infrastructure and services. The scheme is within walking distance of a number of local centres and also the Omni District Centre at Santry.</p> <p>The proposed creche and café will complement the existing uses and facilities in the area.</p>
5. Efficiency - How does the development make appropriate use of resources, including land?	
	EVALUATION OF CONSISTENCY
<i>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</i>	The proposal achieves the optimum density on site having regard to the standards of national and local policy as well as existing services and transport options.
<i>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.</i>	The restriction on parking enables more landscaping. A significant public open space is provided as part of the parent permission, in addition to communal and private open space provision above standard.
<i>Buildings, gardens and public spaces are laid out to exploit the best solar orientation.</i>	The apartment blocks are laid out to ensure all units have access to sufficient light. The majority (55%) of blocks A-E have dual aspect which accords with national policy. The entire scheme (blocks A-G) achieves 57%.
<i>The scheme brings a redundant building or derelict site back into productive use.</i>	This scheme will bring this site back into a productive use and ensure the completion of the development currently under construction on site.
<i>Appropriate recycling facilities are provided.</i>	Communal recycling facilities are provided in the bin stores strategically located proximate to each apartment block.
6. Distinctiveness - How do the proposals create a sense of place?	
	EVALUATION OF CONSISTENCY
<i>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</i>	The parent permission provides for a new public park which forms the natural heart of the development where the wider community will congregate and use the MUGA, playground and associated open space facilities.

<i>The scheme is a positive addition to the identity of the locality.</i>	<p>The subject site is currently vacant and empty. The proposal will provide an appropriate scale and quantum of residential development on a key site beside the Swords Road QBC and local services and facilities.</p> <p>The proposed development will be a very positive addition to the area providing a new focal point in the area.</p>
<i>The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.</i>	The layout of the proposed development is similar to that of the permitted. The improvements arise from the removal of the basement resulting in ecological benefits in terms of reduced excavation and also the enhanced planting allowed with a reduced podium in the communal open space area.
<i>The proposal successfully exploits views into and out of the site.</i>	The impact of this amendment is similar to that of the permitted scheme and will have a positive impact on the townscape.
<i>There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</i>	The permitted public park forms the natural focal point for future residents to congregate and utilise the facilities.
7. Layout - How does the proposal create people friendly streets and spaces?	
	EVALUATION OF CONSISTENCY
<i>Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</i>	The scheme, as permitted, has been designed to provide clear pedestrian routes though the site that connect with the surrounding area. By amending the design of the ramp, the plaza area is improved & permeability enhanced with reduction in car park access ramp.
<i>The layout focuses activity on the streets by creating frontages with front doors directly serving the street.</i>	The apartments, as permitted and proposed, provides frontages that contributes to passive surveillance of the public open spaces within and external to the scheme along pedestrian access paths. The design and shape of the apartment blocks also encourages multiple viewpoints of the open space to the rear, ensuring the passive surveillance is achieved.
<i>The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.</i>	Car parking spaces, as a result of the amendment, are provided mainly at semi-basement level. A single vehicular access in and out is provided with a low traffic speed environment secured. The cars at surface level are restricted to ensure a predominantly car free environment.
<i>Traffic speeds are controlled by design and layout rather than by speed humps.</i>	

<i>Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.</i>	The open space strategy for the scheme creates multiple open spaces of varying uses and sizes. This can be seen in the landscaping strategy by Parkhood Landscape Architects.
8. Public Realm - How safe, secure and enjoyable are the public areas?	
	EVALUATION OF CONSISTENCY
<i>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</i>	Overlooking of streets, communal and public spaces is achieved throughout both in the permitted and proposed amendments.
<i>The public realm is considered as a usable integrated element in the design of the development.</i>	Creation of a mainly car free public realm for pedestrians and cyclists to traverse unhindered is a key design outcome and will create a unique residential development. The landscaping and design of the public realm can be solely dedicated to providing the optimum amenity for residents and visitors.
<i>Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</i>	In the he parent permission a MUGA, and play areas are proposed. Within the amended application, we have also allowed for natural play in the communal open space and within closer proximity to blocks A-E.
<i>There is a clear definition between public, semi-private, and private space.</i>	Landscaping strips will subtly separate the public, semi-private and private areas. Landscaping and species mix will denote these changing spaces. Please refer to the landscaping drawings prepared by Parkhood for further detail.
<i>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</i>	All route for cars are on the circumference of the site, with only pedestrians and cyclists in the centre. This is in both the permitted and proposed scheme.
9. Adaptability - How will the buildings cope with change?	
	EVALUATION OF CONSISTENCY
<i>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</i>	The proposed apartments can be amended internally to adapt to the changing needs of the residents.
<i>The homes are energy-efficient and equipped for challenges anticipates from a changing climate.</i>	Yes, design practices and proposed materials will militate against the effects of climate change.
<i>Homes can be extended without ruining the character of the types, layout and outdoor space.</i>	The new apartments will be constructed in accordance with the energy efficiency standards in place
<i>The structure of the home and its loose fit design allows for adaptation and</i>	N/A

<i>subdivision, such as the creation of an annex or small office.</i>	
<i>Space in the roof or garage can be easily converted into living accommodation.</i>	N/A
10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?	
	EVALUATION OF CONSISTENCY
<i>Each home has access to an area of useable private outdoor space.</i>	Each unit is provided with private balcony/ terrace to standard.
<i>The design maximises the number of homes enjoying dual aspect.</i>	The majority (55%) of blocks A-E have dual aspect which accords with national policy. The entire scheme (blocks A-G) achieves 57%. This is an increase above that of the permitted scheme.
<i>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</i>	All units have been designed to prevent sound transmission in accordance with current building standards.
<i>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</i>	All units have been oriented to minimise overlooking. This has been achieved by ensuring the distance between blocks is appropriate between the blocks. Landscaping strips and boundary treatments at ground floor level ensure that ground floor areas will have an adequate level of privacy.
<i>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.</i>	All units are provided with storage space in line with relevant National Planning Policy requirements.
11. Parking – How will the parking be secure and attractive?	
	EVALUATION OF CONSISTENCY
<i>Appropriate car parking is on-street or within easy reach of the home's front door.</i>	Surface level and semi-basement level parking will provide safe parking within easy reach of the apartments.
<i>Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.</i>	All of the parking is either visible from the apartments or is within a secure semi-basement car park.
<i>Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</i>	The majority of the car parking is in a communal semi-basement car park.

<i>Materials used for parking areas are of similar quality to the rest of the development.</i>	Parking areas will comprise quality surface treatments that promote sustainable drainage and are in keeping with palette and quality of building materials used elsewhere in the area.
<i>Adequate secure facilities are provided for bicycle storage.</i>	Dedicated bicycle parking is provided throughout the scheme in line with the Design Standards for New Apartments and cycle standards and the NTA Cycle Design Manual. Cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road avoiding unnecessarily long access routes with poor passive security or, slopes that can become hazardous in winter weather.
12. Detailed Design – How well thought through is the building and landscape design?	
	EVALUATION OF CONSISTENCY
<i>The materials and external design make a positive contribution to the locality.</i>	The overall choice of materials and elevations reflect the development in the surrounding area and will be an attractive feature in the landscape.
<i>The landscape design facilitates the use of the public spaces from the outset.</i>	The open spaces will be provided once all the apartment blocks are completed.
<i>Design of the buildings and public space will facilitate easy and regular maintenance.</i>	The layout of the blocks and the landscaped areas will be accessible for easy and regular maintenance.
<i>Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.</i>	Parking is predominantly at semi-basement and is limited in favour of providing high quality landscaped open space.
<i>Care has been taken over the siting of flues, vents and bin stores.</i>	<p>Bin stores and bike stores are located discretely around the site. The vents have been carefully located to enable venting of the basement, while not impacting on the landscape layout. These vents allow the semi-basement to be vented naturally.</p> <p>The ESB substations have been designed into the apartment blocks to minimise intrusion on the open space and public realm.</p>

Quality Housing for Sustainable Communities: Best Practice Guidelines For Sustainable Communities, 2007

The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. 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 policy statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas having regard to the following:

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

The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development:

	EVALUATION OF CONSISTENCY
<u>Socially & Environmentally Appropriate</u> <i>"The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces."</i>	<p>The scheme will provide an appropriate mix of studio, 1, 2 and 3 bedroom apartments, given the high level of traditional two storey housing types and lack of choice existing in the area. The proposal seeks to integrate usable open spaces distributed throughout the scheme and all interconnected. All open spaces will be overlooked by adjoining residential blocks.</p>
<u>Architecturally Appropriate</u> <i>"The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage."</i>	<p>The proposal has been designed to respect, integrate into, and enhance the surrounding environment and context.</p> <p>The design and layout of the scheme creates a liveable and visually pleasing residential environment.</p> <p>The design is appropriate and mindful of the urban edge context, the site constraints, and architectural character of the adjoining residential areas.</p>

<p><u>Accessible & Adaptable</u></p> <p><i>"There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime."</i></p>	<p>This units in this scheme are highly accessible to all due to the provision of lifts within the scheme. The landscaping also is clearly laid out and level ensuring people can navigate easily.</p> <p>A single vehicular access will be provided and a reduced residential parking ratio of 0.40 spaces per unit is proposed (For blocks A-G). This scheme limits the access of vehicles in the scheme creating a safe, pedestrian dominated development.</p> <p>Pedestrian/cyclist connections provided, and there will be significant bicycle parking provision also.</p> <p>The communal open spaces, residential amenity areas, and public spaces are easily accessible with clear routes and access points. This will provide ease of access and circulation for all residents.</p> <p>All the apartments are accessible to all. Lifts provide access to the apartments on the upper floors, and the duplexes on the ground floor have own door access.</p> <p>The internal layout of each apartment can be adapted if required to meet the changing needs of residents during the course of their lifetime.</p>
<p><u>Safe, Secure & Healthy</u></p> <p><i>"The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives."</i></p>	<p>The scheme will provide good segregation of vehicle and pedestrians/cyclists with the vast majority of the site free from cars.</p> <p>A very safe walking and cycling environment will be provided for residents with a network of paths located around the development.</p> <p>Public open spaces shall be overlooked as far as practicable to achieve maximum passive surveillance.</p>
<p><u>Affordable</u></p> <p><i>"The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development."</i></p>	<p>The mix of unit types and sizes will offer a range of housing options making the scheme affordable to future homeowners and to the developer.</p> <p>A management company will be established to maintain and manage the areas of communal open space, parking and bin storage associated with the apartments.</p>
<p><u>Durable</u></p> <p><i>"The best available construction techniques should be used, and key elements of</i></p>	<p>The scheme endeavours to use the best available materials and construction techniques in order to</p>

<i>construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works.</i>	minimise the level of refurbishment over the lifetime of the scheme.
<p>Resource Efficient</p> <p>"Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised."</p>	<p>The subject site is located in close proximity to public transport, education facilities, sports facilities, and retail services. There is a neighbourhood centre located opposite site along Swords Road and a second neighbourhood centre c. 300m north of the site along Collins Avenue.</p> <p>The site is located along the Swords Quality Bus Corridor which is served by numerous high-frequency bus services connecting the site with Dublin City Centre, Balbriggan, Swords, and Dublin Airport.</p> <p>The apartment blocks are oriented in such a way, so that they have maximum solar gain. This ensures that the units and their associated private open space benefit from sunlight throughout the day.</p>

EVALUATION OF CONSISTENCY

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

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

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

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

It is intended that the Sustainable Residential Development and Compact Settlement Guidelines will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied. At the time of submitting this LRD application, the

accompanying Design Manual has not been published, therefore the proposed development is assessed against the 2009 Urban Design Manual as set out within this Statement of Consistency.

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

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. Under this categorisation, as set out in Table 3.1 – Area and Density Ranges Dublin and Cork City and Suburbs, this site would be considered a City – Urban Neighbourhood.

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

Section 3.4 provides further advice on *Refining Density* and includes a two-step process. Step 1: Consideration of Proximity and Accessibility to Services and Public Transport. This identifies that *while densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations. Densities above the ranges are ‘open for consideration’ at accessible suburban and urban extension locations to the maximum set out in Section 3.3.*

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

<p>High Capacity Public Transport Node or Interchange</p> <ul style="list-style-type: none"> • Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop. • Highest densities should be applied at the node or interchange and decrease with distance. • 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.
<p>Accessible Location</p> <ul style="list-style-type: none"> • Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.
<p>Intermediate Location</p> <ul style="list-style-type: none"> • Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and • Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.
<p>Peripheral</p> <ul style="list-style-type: none"> • Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

Figure 31- Table 3.8 - Accessibility

The application site is located within "Corridor-A (Drogheda – Balbriggan – Swords – Airport – North Inner City – to Dublin City Centre)", in the inner metropolitan area. This proposed development is located along the Swords Road QBC which is served by high-frequency bus routes. This road will also be upgraded as part of BusConnects. Accordingly, the subject site is considered to be within a **high capacity public transport nodes or interchanges** (defined in Table 3.8).

Evaluation of Consistency

The site is located within a brownfield infill site that is distinct from adjoining properties and land uses. There is a mixture of uses within the area, however, the predominant one is residential.

The site benefits from extant permission and represents a unique opportunity to deliver a significant residential development in a well-established, well serviced and highly accessible suburban location within the city.

The proposed development is considered a High Capacity Public Transport Node, as outlined in the table above, due to the site's proximity to a high quality public transport corridor along Swords Road. Accordingly, the scheme is considered in accordance with the criteria relating to car parking, separation distances, density, private open space and cycle storage for such locations.

The density appropriate to this area is in the range of 50uph to 250uph. Therefore, the proposed density of 173 uph (Blocks A-G) is considered appropriate to this highly accessible, urban location.

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

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

Sustainable Urban Housing: Design Standards for New Apartments, 2023

The Apartment Guidelines 2023 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland. These guidelines replace the Sustainable Urban Housing: Design Standards for New Apartments 2020.

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

The subject site represents an "Central and /or Accessible Urban Location" in this regard due to its close proximity (less than 0.3km) to an extensive network of bus routes and services and the associated availability of high frequency bus routes, including the increased service capacity associated with the proposed BusConnects 'Swords Rd – City Centre – Terenure' Spine Bus Corridor Route (A1, A2, A3, A4).

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

SPPR 1

EVALUATION OF CONSISTENCY

<p>Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</p>	<p>The proposed development provides 334 no. apartments.</p> <p>Units A-E have extant permission for</p> <ul style="list-style-type: none"> - 3 no. studio (1%) - 89 no. 1-bed (29%) - 204 no. 2-bed (67%) - 9 no. 3-bed (3%) <p>This amendment application seeks to permission for an additional 29 no. units with an amended unit mix consisting of</p> <ul style="list-style-type: none"> - 0 no. studio (0%) - 150 no. 1-bed (45%) - 153 no. 2-bed (46%) - 31 no. 3-bed (9%) <p>The revised housing mix will continue to cater for a wide range of different households at different stages of the life cycle, which we consider fully aligns with Dublin City Council's Development Plan and the opinion of the ABP Inspector.</p> <p>The proposed amendments will introduce a more balanced form of development to this area, appealing to a broad ranging demographic e.g. young families to single professionals and empty nesters. Furthermore, by providing over 3.5 times the number of 3 bed units and through the provision of a creche, this development will appeal to families. Accordingly, this revised unit mix will contribute to sustainable planning goals by accommodating various needs, attracting a broader range of residents.</p>
<p>SPPR 2</p>	<p>EVALUATION OF CONSISTENCY</p>
<p>For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:</p> <ul style="list-style-type: none"> - Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the 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 	<p>The subject site exceeds 0.25ha and therefore SPPR1 applies to the site. The proposal is for a development consisting of 334 no. residential units with a mix as shown in SPPR1.</p>

<p>the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;</p> <p>- For schemes of 50 or more units, SPPR 1 shall apply to the entire development;</p> <p>All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development</p>	
SPPR 3	EVALUATION OF CONSISTENCY
<p>Minimum apartment floor areas:</p> <p>studio apartments (1 person) 37sqm</p> <p>1 bedroom apartment (2 persons) 45sqm</p> <p>2 bedroom apartment (4 persons) 73sqm</p> <p>3 bedroom apartment (5 persons) 90sqm</p>	<p>The current proposal achieves these standards as set out in the Housing Quality Assessment.</p>
SPPR 4	EVALUATION OF CONSISTENCY
<p>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following apply</p> <p>i) a minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate</p>	<p>The aspect of units is acceptable noting that the overall proportion of dual aspect units was 55%, which exceeds the 33% requirement for central and/or accessible areas as required by SPPR 4 of the Apartment Guidelines.</p>
SPPR 5	EVALUATION OF CONSISTENCY
<p>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</p>	<p>The proposed building achieves this standard within each block.</p>
SPPR 6	EVALUATION OF CONSISTENCY

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

Each apartment core has 12 or less than 12 apartment per core in accordance with SPPR6.

EVALUATION OF CONSISTENCY

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

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

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

Guidelines For Planning Authorities on Childcare Facilities, 2001

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

Section 4.7 of the *Sustainable Urban Housing Design Guidelines for New Apartments*, 2022 states the following:

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

EVALUATION OF CONSISTENCY

The permitted scheme consisted of c. 446sq.m creche with an associated outdoor play area of c. 118sq.m located at the ground floor of block A. Through the rationalisation of Block A, the creche now proposed has a better, more cohesive layout so while smaller in sqm will accommodate 65 children (63 originally permitted) and will work more efficiently. Furthermore, the amended creche has a larger crèche external play space (+ 60.7sqm) to the east of block is permitted. There is also better separation from the apartment block than in the permitted application.

Transport Strategy for The Greater Dublin Area 2016-2035

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

EVALUATION OF CONSISTENCY

The application site is located within “Corridor-A (Drogheda – Balbriggan – Swords – Airport – North Inner City – to Dublin City Centre)”, in the inner metropolitan area. The NTA has identified that there is limited scope for further increases in road capacity and identifies that trips will have to be catered for by public transport. This proposed development is located along the Swords Road QBC which is served by high-frequency bus routes. This road will also be upgraded as part of BusConnects.

This proposed development due to its location close to the variety of bus routes, is in line with the ambitions of this policy. The proposed development, by its promotion of reduce car parking, promotes the use of alternative modes of transport including cycling, walking and buses.

Climate Change Action Plan 2021

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

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

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

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

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

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

EVALUATION OF CONSISTENCY

The proposed development has good connectivity with existing and proposed high frequency transport corridors that will reduce the commute times. The site is located on the Swords Road QBC which is served by high-frequency bus routes. The proximity to these bus routes will encourage a modal shift away towards more sustainable modes of transport.

Proposed development will employ the latest technology to provide for sustainable heating and insulation of apartments. The buildings will comply with design regulations that will reduce carbon emissions in line with the Action Plan. The building life cycle report outlines the sustainability measures within the development.

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

- The Dublin City University main campus is a c. 18 minute walk and a c. 5 minute cycle from the site. The Dublin City St. Patrick's Campus is a c. 15 minute walk and a c. 4 minute cycle from the site.
- Beaumont Hospital and the Bons Secours Hospital are both a c. 9 minute cycle from the site.
- The Omni Shopping Centre is a c. 18 minute walk, a c. 7 minute cycle, or a c. 8-15 minute bus journey from the site. Artane Shopping Centre is a c. 9 minute cycle from the site.
- There are two local centres, one along Swords Road and one along Collins Avenue, that are both within a 2 minute walk from the site.
- Santry Park, National Botanical Gardens, Albert College Park and Fairview Park area all a c. 11-12 min cycle from the site. Ellenfield Park is a c. 6 minute cycle or a c. 15 minute walk from the site.
- Whitehall Colmcille GAA is a 2 minute walk from the site and St. Vincent's GAA is a c. 7 minute walk from the site.

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

Guidelines For Planning Authorities on The Planning System and Flood Risk Management, 2009

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

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

EVALUATION OF CONSISTENCY

A Site-Specific Flood Risk Assessment by Hydrocare Environmental Ltd submitted with this application. This identified that the development is located in the Flood Zone C as defined by the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and meets the requirements of the Guidelines.

In summary the report has concluded that Based on the above assessments and owing to its location within Flood Zone C, outside the Fluvial and Coastal Flood Zones, there is an overall low risk of flooding to the site.

This Site-Specific FRA deems the proposed development to be appropriate and to comply with SFRA for the Dublin City Development Plan 2022-2028 and the "Planning System and Flood Risk Management – Guidelines for Planning Authorities" (DoEHLG/OPW, 2009).

Local Planning Policy

Dublin City Development Plan 2022-2028

The site is located within the administrative area of Dublin City Council and is therefore subject to the land use policies and objectives of the City Development Plan 2022-2028. It is noted that in the intervening period between the grant of the extant permission to now, Dublin City Council adopted a new Development Plan which came into effect on the 14th of December 2022.

Zoning

On the Dublin City Development Plan, 2022-2028 zoning maps (Map B) the site, and the adjoining lands, are zoned "*Z12: Institutional Land (Future Development Potential)*" and with the objective "*To ensure existing environmental amenities are protected in the predominantly residential future use of these lands.*"

These are lands, the majority of which are, or which have been in institutional use, which may be developed for other uses in the future. They may include colleges, and residential health care institutions (e.g. hospitals). Significant ancillary facilities such as staff accommodation and dedicated open space and sports/recreational facilities are also often included.

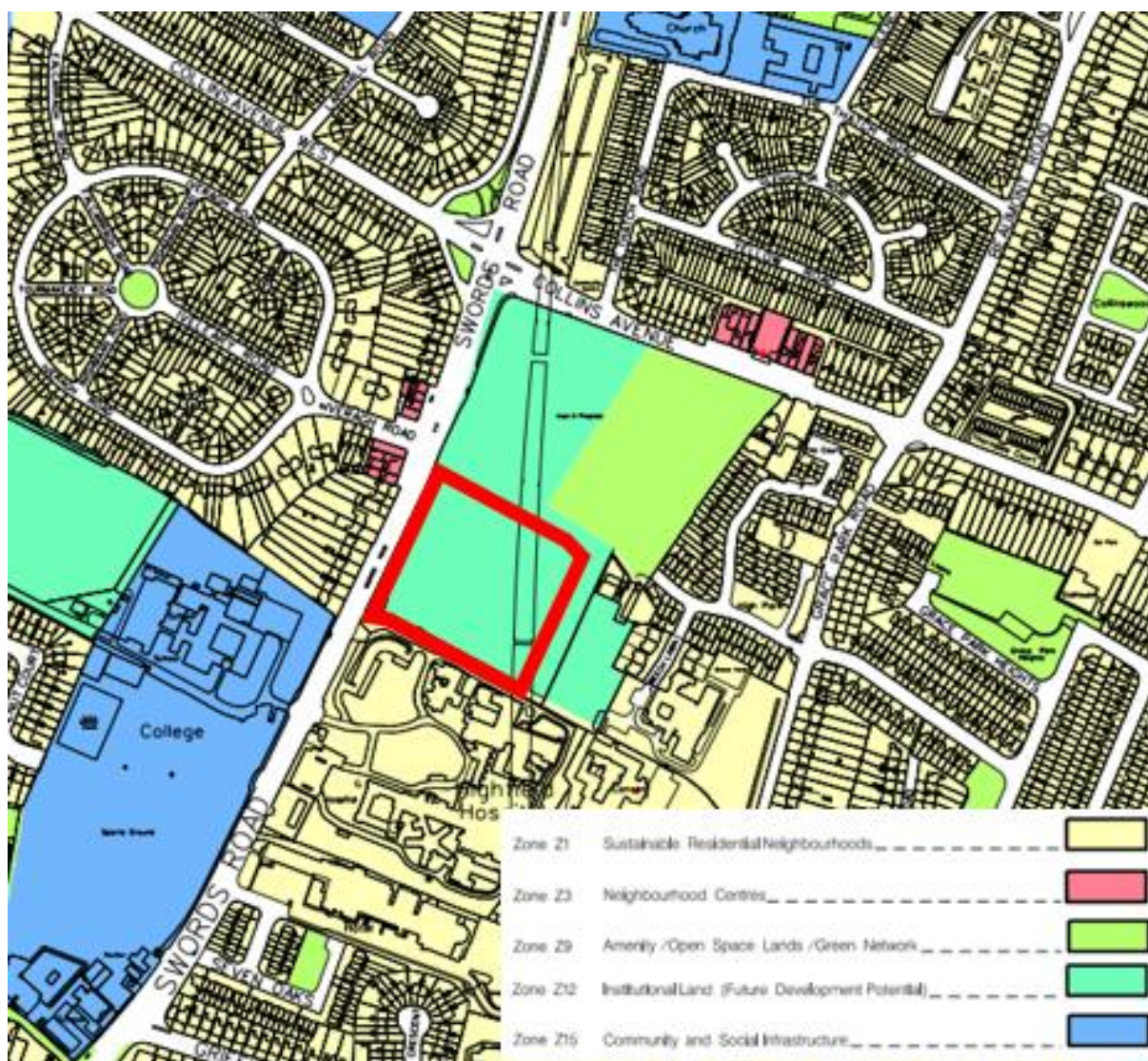


Figure 32 - Dublin City Development Plan, 2022-2028 zoning maps (Map B)

Z12 – Permissible Uses

Assisted living/retirement home, bed and breakfast, buildings for the health, safety and welfare of the public, café/ tearoom, **childcare facility**, community facility, conference centre, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, garden centre/ plant nursery, golf course and clubhouse, guesthouse, halting site, home-based economic activity, hostel (tourist), hotel, live-work units, media associated uses, medical and related consultants, open space, place of public worship, primary health care centre, public service installation, **residential**, residential institution, restaurant, shop (local), sports facility and recreational uses, training centre.

Z12 - Open for Consideration Uses

Boarding kennel, Build to Rent residential, car park ancillary to main use, civic and amenity/recycling centre, club house and associated facilities, crematorium, financial institution, funeral home, hostel (tourist), industry (light), municipal golf course, nightclub, office, off-licence (part), outdoor poster advertising, public house, science and technology based industry, shop (neighbourhood), student accommodation.

**see assessment against Z12 policy below*

Both childcare facility and residential uses are permissible under this Z12 zoning, and therefore these elements of the proposal are fully compliant with the Development Plan.

Section 14.7.12 of the Development Plan makes specific reference to:

Development on Z12 Lands	
Policy	Evaluation of Consistency
Where lands zoned Z12 are to be developed, a minimum of 25% of the site will be required to be retained as accessible public open space to safeguard the essential open character and landscape features of the site. Where such lands are redeveloped, the predominant landuse will be residential.	<p>This site has been zoned Z12 lands for over ten years. Under the previous Development Plan 2016-2022 it was required to provide 20% Public Open Space. In line with this policy the permitted development SHD 313289 provided 22% public open space on this site. This excludes the additional public open space to be provided on the adjoining Z12 lands being delivered by DCC to the immediate north and which also forms part of the overall Whitehall Framework Plan.</p> <p>This principle of this site layout, residential development and quantum of open space provision has already been established under the extant SHD permission. The current application is an amendment to 5 of the permitted blocks along with the car parking provision. It is not proposed to amend the overall site layout or revised the established principles of the permitted development.</p> <p>Section 34 (3C)(b) of the Planning and Development Act, 2000 as amended is also noted and which states: <i>"on foot of an application in accordance with section 32A, the planning authority concerned shall, notwithstanding section 34(2)(a), be restricted in its determination of the application, other than in respect of any assessment of the effects of the proposed development on the environment, to considering the modifications proposed by the applicant to the previously permitted development and for the purposes of determining such an application the reference in subsection (6) to "the development concerned" shall be read as a reference to "the modifications to the previously permitted development"</i>.</p>
In considering any proposal for development on lands subject to zoning objective Z12, other than development directly related to the existing community and institutional uses, Dublin City Council will require the preparation and submission of a masterplan setting out a clear	<p>This is an amendment to a permitted scheme and a new masterplan would not required for this amendment application.</p> <p>It is also noted that, as set out in the SHD 313289 Inspectors Report and the Planning Report of the parent permission, this site is part of the overall</p>

<p>vision for the future development of the entire landholding.</p> <p>In particular, the masterplan will need to identify the strategy for the provision of the 25% public open space requirement associated with any residential development, to ensure a coordinated approach to the creation of new high-quality public open space linked to the green network and/or other lands, where possible. In addition, development shall have regard to the standards in Chapter 15.</p>	<p>Whitehall Framework Plan and as such this provides the framework/ masterplan for the overall lands. An additional masterplan is not required.</p> <p>Finally with regard to the 25% provision, it is considered that this applies to the entire Z12 Zoning as a whole at this location including the DCC lands to the north. Part of the site to the north has permission for development under a PART 8 DCC grant of permission. This delivers additional open space in accordance with the framework plan. Overall, when considered in its entirety the Z12 development area (current application site and DCC lands) can achieve the 25% over the entire zoned area.</p>
<p>On Z12 lands, the minimum 25% public open space shall not be split up into sections/fragmented and shall comprise soft landscape suitable for relaxation and children's play, unless the incorporation of existing significant landscape features and the particular recreational or nature conservation requirements of the site and area dictate that the 25% minimum public open space shall be apportioned otherwise.</p>	<p>This is noted, as set out in the parent permission as determined under the 2016-2022 Development Plan the Public Open Space is provided in a large single area within the parent permission site which this application is amending. This amendment application will not alter this.</p> <p>An additional large public open space will also be provided in the adjoining Z12 lands to the north.</p>
<p>Where there is an existing sports pitch or sports facility on the Z12 lands subject to redevelopment, commensurate recreational/social infrastructure will be required to be provided and retained for community use where appropriate as part of any new development (see also Chapter 10: Green Infrastructure and Recreation, Policy GI49).</p>	<p>N/A</p>

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

Chapter 1: Strategic Context and Vision

The main goal for Dublin City Council is to achieve a more sustainable and resilient city. The following are strategic principles of the Development Plan relevant to the proposed development:

- **Social/Residential** - creating a more compact city with a network of sustainable neighbourhoods (aligned with the principle of the 15 minute city) which have a range of facilities and a choice of tenure and house types, promoting social inclusion and integration of all ethnic/minority communities.
- **Sustainable Movement** - helping to build an integrated transport network and encouraging the provision of greater choice of public transport and active travel including walking and cycling.

- **Urban Form** - creating a connected, legible and liveable city with a distinctive sense of place, based on active streets, quality public spaces and adequate community and civic infrastructure.
- **Healthy Placemaking**- ensuring quality architecture, urban design and green spaces to provide quality of life and good health and wellbeing for all.

The Core Strategy states that based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the development plan must accommodate between 20,120-31,520 additional persons up to an overall population target of between 625,750 and 640,000 by 2028. The housing demand calculated sets a requirement for the development plan to provide for approximately 40,000 housing units between 2022 and 2028.

The delivery of quality housing in Dublin City is a key issue. The Core Strategy notes that National and regional policy places an emphasis on compact growth and supports the sustainable development of brownfield and infill lands, through consolidation to support the optimal use of the finite resource of land.

EVALUATION OF CONSISTENCY

This proposal seeks permission for an amendment to an approved SHD.

The proposed development represents an attractive residential development in an established residential, built up, highly accessible and well serviced location within Dublin City Centre. The development will provide for an effective and efficient use of this serviced lands. The site has an extant permission (at the time of writing) for 7 buildings which are similar in character to this proposed application. The proposed 5 blocks which are the subject of this amendment are in the same location and the layout of the development remains as permitted. It is simply a rationalisation of the buildings and alterations to the internal layouts which are creating the uplift. The replacement of the basement car park with a semi-basement car park will enable the modal shift envisaged by the Dublin City Development Plan.

The proposed development will provide new homes within the existing built up footprint on a brownfield site, it will assist in the achievement of the compact growth of this self-sustaining growth town, it is considered that the proposed development complies with the Core Strategy of the DCDP.

Chapter 3: Climate Action

Policy	Evaluation of Consistency
CA3 Climate Resilient Settlement Patterns, Urban Forms and Mobility To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019.	The proposed development is contributing towards climate resilient settlement patterns, urban forms and mobility. The proposed development is a high-density development within this urban area. The site is currently brownfield with extant permission for an SHD.
CA4 Improving Mobility Links in Existing Areas To support retrofitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city, such as	The design of the proposal respects the permitted SHD whereby a new public park, quiet perimeter streets and a predominantly pedestrianised environment will be provided.

<p>reopening closed walking and cycling links or providing new links between existing areas.</p>	<p>There are multiple links into and through the development. All of the public open spaces are activated with through apartments opening onto them or retail and creche facilities addressing them creating a vibrant attractive and safe environment. Walking and cycling links have been further enhanced to support cycling and walking to and from the site. Please refer to the Mobility Management Plan prepared by Punch and the Car and Cycle Strategy Report prepared by CWOB.</p>
<p>CA5 Climate Mitigation and Adaptation in Strategic Growth Areas To ensure that all new development including in Strategic Development and Regeneration Areas integrate appropriate climate mitigation and adaptation measures. See also Section 15.4.3. Sustainability and Climate Action and Section 15.7.3 Climate Action and Energy Statement.</p>	<p>The proposed development incorporates appropriate climate mitigation and adaptation measures. An Energy Analysis Report has been prepared by IN2 is submitted with this planning application.</p>
<p>CA8 Climate Mitigation Actions in the Built Environment To require low carbon development in the city which will seek to reduce carbon dioxide emissions, and which will meet the highest feasible environmental standards during construction and occupation, see Section 15.7.1 when dealing with development proposals. New development should generally demonstrate/ provide for:</p> <ul style="list-style-type: none"> a) building layout and design which maximises daylight, natural ventilation, active transport and public transport use; b) sustainable building/services/site design to maximise energy efficiency; c) sensitive energy efficiency improvements to existing buildings; d) energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments; e) on-site renewable energy infrastructure and renewable energy; f) minimising the generation of site and construction waste and maximising reuse or recycling; g) the use of construction materials that have low to zero embodied energy and CO2 emissions; and h) connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible. 	<p>The proposed layout will ensure that the proposed units and open spaces will all achieve good levels of daylight and sunlight.</p> <p>The proposal includes reduced car parking predominantly at semi-basement level and a high provision of cycle parking which will encourage a modal shift away from car dependency. The layout will also provide high quality pedestrian permeability throughout.</p> <p>The building will be built to a high quality, ensuring maximum energy efficiency. The scheme design employs the most up-to-date design and construction techniques that will improve energy performance throughout the scheme.</p> <p>Standard construction waste practices will be used to minimise the waste generated during the construction phase.</p>

<p>CA9 Climate Adaptation Actions in the Built Environment</p> <p>Development proposals must demonstrate sustainable, climate adaptation, circular design principles for new buildings / services / site. The council will promote and support development which is resilient to climate change. This would include:</p> <ol style="list-style-type: none"> measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect; ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings; minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS); reducing flood risk, damage to property from extreme events— residential, public and commercial; reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply; promoting, developing and protecting biodiversity, novel urban ecosystems and green infrastructure 	<p>As per the granted SHD application, the proposed application is designed in accordance with the principles of Sustainable Urban Systems (SUDS) and in compliance with the principles outlined in the Greater Dublin Strategic Drainage Study Regional Drainage Policies Volume 2 for new developments. The implemented SUDS features where possible include:</p> <ul style="list-style-type: none"> Green Roofs Podium Green Areas over semi basement carpark. Permeable Paving parking spaces & footpaths Filter drains/ infiltration strips alongside impermeable surfaces where applicable Tree pits where applicable. <p>The incorporation of the above SUDS elements will provide a sustainable manner in which to disperse the surface water from the proposed development and will encourage groundwater recharge and provide treatment of runoff and subsequent improvement of discharge quality.</p> <p>The decreased podium deck reduces the attenuation volume required and promotes improved groundwater recharge compared to the granted SHD application.</p> <p>As a result of the proposed reduced size of the basement, the stormwater network has been modified to suit.</p> <p>Please refer to the Surface Water layout drawing (L24-01-LRD-020) and SuDs features layout drawing (L24-01-LRD-021) prepared by JOR.</p> <p>Please refer to Engineering Report and drawings prepared by JOR Consulting Engineers for full details.</p> <p>Please refer to the SSFRA prepared by HYDROCARE consulting engineers.</p>
<p>CA10 Climate Action Energy Statements</p> <p>All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been</p>	<p>An Energy Analysis Report has been prepared by IN2 is submitted with this planning application.</p> <p>Proposed development will employ the latest technology to provide for sustainable heating and insulation of apartments. The buildings will comply with design regulations that will reduce carbon emissions in line with the Action Plan.</p>

<p>considered as part of the overall design and planning of the proposed development.</p>	<p>The building life cycle report outlines the sustainability measures within the development.</p>
<p>CA15 Waste Heat, District Heating and Decentralised Energy To actively encourage the development of low carbon and highly efficient district heating and decentralised energy systems across the city utilising low carbon heat sources such as renewable energy and waste heat recovery and to promote the connection of new developments to district heating networks where such systems exist/can be developed in a given area.</p>	
<p>CA17 Supporting the Potential of District Heating in Dublin City To support, encourage and facilitate the potential of district heating in Dublin City, all Climate Action Energy Statements submitted to the Council (see Policy CA10) shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources. In addition:</p> <ul style="list-style-type: none"> • Climate Action Energy Statements for significant new residential and commercial developments in Strategic Development and Regeneration Areas (SDRAs), will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to an available or developing district heating network in the area. • Climate Action Energy Statements for significant new residential and commercial developments in the Docklands SDRA will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to the Dublin District Heating System. 	
<p>CA29 Climate Action and Green Infrastructure To protect, connect and expand the city's Green Infrastructure while optimising the climate change adaptation and mitigation services it provides.</p>	<p>The permitted SHD permission provides a significant new public open space of over 0.5ha which will be available to the wider community and will include a MUGA. In addition, the development will be served by dedicated communal open space include, roof gardens and 657m² plaza. The recreational needs for a range of different ages including children, adults and the elderly will be facilitated.</p>

Chapter 4: Shape and Structure of the City

Policy	Evaluation of Consistency
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<p>SC9 Key Urban Villages, Urban Villages and Neighbourhood Centres</p> <p>To develop and support the hierarchy of the suburban centres, including Key Urban Villages, Urban Villages and Neighbourhood Centres, in order to:</p> <ul style="list-style-type: none"> • support the sustainable consolidation of the city and align with the principles of the 15 minute city; • provide for the essential economic and community support for local neighbourhoods; and • promote and enhance the distinctive character and sense of place of these areas by ensuring an appropriate mix of retail and retail services. 	<p>The proposed development is located within the established residential area of Whitehall. The development of this brownfield site through the provision of appropriately high density housing is in line with the principles of the 15 minute city and the compact city.</p> <p>The site is close to an array of amenities and services such as employment, retail, medical, educational and recreation.</p> <p>The proposal is a striking design and layout which optimise this large infill site and will enhance and develop the character of this residential area.</p> <p>It will remove a vacant, underutilised site and transform it with a development that will contribute positively to the neighbourhood in terms of increased population and wider, more sustainable residential mix.</p>
<p>SC10 Urban Density</p> <p>To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.</p>	<p>The proposed density of the overall site (A-G) equates to c. 173 uph. This is the same as permitted density which is also 173 uph, it will also deliver the same number of units originally applied for.</p> <p>As set out above the proposal and its density is considered appropriate for this site and in accordance with the principles set out in the Sustainable Residential Developments in Urban Areas - Guidelines for Planning Authorities and the Urban Design Manual.</p>
<p>SC11 Compact Growth</p> <p>In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:</p> <ul style="list-style-type: none"> • enhance the urban form and spatial structure of the city; • be appropriate to their context and respect the established character of the area; • include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents; • be supported by a full range of social and community infrastructure such as schools, shops and recreational areas; 	<p>The proposed development will provide an additional 29 units within a high-quality permitted residential development on this site within the existing urban environment. This will make best and most efficient use of this scarce resource, land.</p> <p>It is appropriate to the context and has been carefully designed to minimise any impact on the surrounding residential properties.</p> <p>There are a wide range of community facilities within a short distance of the subject site.</p> <p>The proposal has been designed in accordance with all relevant standards and guidance</p>

<ul style="list-style-type: none">and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.													
<p>SC12 Housing Mix</p> <p>To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.</p>	<p>The scheme provides for a variety of housing and apartment sizes and types.</p> <p>The unit mix breakdown of the scheme is as follows:</p> <table><tr><th>Unit Type</th><th>Number</th><th>Percentage</th></tr><tr><td>1 bed</td><td>151</td><td>45%</td></tr><tr><td>2 bed</td><td>152</td><td>46%</td></tr><tr><td>3 bed</td><td>31</td><td>9%</td></tr></table>	Unit Type	Number	Percentage	1 bed	151	45%	2 bed	152	46%	3 bed	31	9%
Unit Type	Number	Percentage											
1 bed	151	45%											
2 bed	152	46%											
3 bed	31	9%											
<p>SC13 Green Infrastructure</p> <p>To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.</p>	<p>The proposal includes green spaces which provide communal and public open spaces to serve the development and the wider area. These green spaces will contribute to mitigating and adapting to climate change by providing a cooling effect for the urban environment, a habitat for flora and fauna, and drainage for surface water.</p>												
<p>4.5.4 Increased Height as Part of the Urban Form and Spatial Structure of Dublin</p> <p>Appropriate heights should be based on an evaluation of the sites attributes and its function, its surrounding context and capacity for growth and the most appropriate development form. It is a requirement that a masterplan will be prepared for any site greater than 0.5ha to allow for the early testing of appropriate open space, sunlight, daylight, visual impacts wind effect etc. and that this is used to inform design development.</p> <p>Proposals seeking to optimise height in achieving higher densities must demonstrate how they will assist in delivering vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced and that respond positively to the existing or emerging context. Appendix 3 also sets out a detailed set of performance based criteria for the assessment of proposals of enhanced scale and height so as to ensure the protection of the natural and heritage assets of the city.</p>	<p>The previously permitted scheme on the site will commence construction later this year. This application will provide a slight increase in height in blocks B, D and E and uplift in residential unit numbers. It will also improve the open space provided on the site.</p> <p>The buildings vary in height between four and eight storeys, which is the same as the permitted scheme, with lower heights in close proximity to existing buildings and increased heights at the centre of the development.</p> <p>The design, materials, scale and height of apartments is complementary of the existing residential developments within the area. The scale and form of the apartment blocks will provide a strong urban frontage to Swords Road, a key route into Dublin City centre.</p>												
<p>SC14 Building Height Strategy</p> <p>To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4.</p>	<p>The proposed development includes heights up to 8 storeys. This height can be readily absorbed at this location without due impact on the character of the area or neighbouring properties.</p>												

<p>SC15 Building Height Uses</p> <p>To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.</p>	<p>The increased building height is minor, and as can be seen from the photomontages and the building, while having an impact on the area, will still have a positive impact, improving the street scene. Given the width of the streets, along with the setback design of the escape corridor, the increased height will not be readily perceptible or domineering at street level.</p> <p>The proposed development provides open spaces, landscaping and additional facilities in the form of community, culture and arts space.</p> <p>As set out above under the National Policy section, the development is in line with guidelines SPPR 1-4.</p>
<p>SC16 Building Height Locations</p> <p>To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.</p>	<p>The proposed development will integrate appropriately with the surroundings, having regard to the location of the subject site on the Swords Road within an existing built-up area, close to Drumcondra, DCU, Beaumont and Dublin City Centre. It is well served by public transport and in proximity to employment locations, services and facilities. The set back of the building and the stepping height results in the buildings presenting an attractive and appropriate urban streetscene in the area.</p>
<p>SC17 Building Height</p> <p>To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:</p> <ul style="list-style-type: none"> • follow a design led approach; • include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3); • make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context; • deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; • Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and • have regard to the performance-based criteria set out in Appendix 3. <p>All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the</p>	<p>It is our opinion that the subject site is capable of and appropriate for additional height and density having regard to the introduction of the <i>National Planning Framework</i> and the <i>Building Height Guidelines</i> which encourages increased height and density in highly sustainable and underused sites such as these. The proposed development has been designed to ensure the protection and amenity not only of future occupants of this development but also those of the existing residents in the adjacent properties. To this end the highest elements have been located furthest away from existing residents at the least sensitive locations within the subject site.</p>

cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.	
SC19 High Quality Architecture To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods	<p>The proposed development is set out in five urban blocks and aligns with the permitted layout which is currently under construction. The materials and finishes of the proposed blocks will be designed to a high architectural standard. The materials and finishes have also been considered with regard to the surrounding existing pattern of development and material pallet in the locality.</p> <p>It is considered to be a high-quality exemplar design that will improve the character and appearance of this key site along Swords Road.</p>
SC20 Urban Design Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019).	<p>The proposal is in accordance with the Urban Design Manual and the Design Manual for Urban Roads and Streets (DMURS). Please see the report submitted by PUNCH and ORS.</p>
SC21 Architectural Design To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.	<p>The proposal will provide a contemporary building on this greenfield site which will make a positive contribution to the character of the area while also being resilient to climate change.</p>
SC22 Historical Architectural Character To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.	<p>The proposed development does not have any protected structures on the site, nor are there any in the immediate vicinity. Equally the site is not located within or adjacent an Architectural Conservation Area (ACA) or zone of archaeological potential.</p>
SC23 Design Statements That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.	<p>CWOB Architects have prepared a Design Statement which is submitted with this application. This statement is in accordance with the principles set out in Chapter 15.</p>

Chapter 5: Quality Housing and Sustainable Neighbourhoods

Policy	Evaluation of Consistency
QHSN1 National and Regional Policy To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland	<p>The proposed development will provide additional housing on this brownfield site within the existing built-up area of Whitehall, along the Swords Road in Dublin City. This is in line with all regional and national policies.</p>

and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.	
<p>QHSN2 National Guidelines</p> <p>To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2022), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2019, the Design Manual for Quality Housing (2022), the Design Manual for Urban Roads and Streets (DMURS) (2019), the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.</p>	<p>Compliance with Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) is demonstrated under the heading National and Regional policy section.</p> <p>We refer to the Development Summary and Schedule prepared by CWOB Architects for more information and note that the scheme complies with the qualitative and quantitative standards outlined in the guidelines.</p>
<p>QHSN6 Urban Consolidation</p> <p>To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.</p>	The proposed development will provide new apartments at this suburban brownfield site in the established area of Whitehall, in close proximity to existing services and public transport options.
<p>QHSN9 Active Land Management</p> <p>To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.</p>	
<p>QHSN10 Urban Density</p> <p>To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.</p>	The proposed development will provide a high-density development which is cognisant of the character of the surrounding area.

<p>QHSN11 15-Minute City</p> <p>To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.</p>	<p>There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centre and schools and university. The location of the site contributes to the accessibility of surrounding facilities for the daily needs of the residential development.</p>
<p>QHSN12 Neighbourhood Development</p> <p>To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:</p> <ul style="list-style-type: none"> • build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places; • integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city; • encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance; • promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model. • promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance; • promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects; • cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion; • provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life; • have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the 	<p>The proposed development will have a positive impact on the existing suburban area of Whitehall, it is in proximity to existing services and public transport options.</p> <p>The architectural design has taken the character of the surrounding area into consideration throughout its design.</p> <p>Green spaces which provide communal and public open spaces incorporated into the layout of the development to serve both the proposed development and the wider area.</p>

<p>Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)';</p> <ul style="list-style-type: none"> are designed to promote safety and security and avoid anti-social behaviour 	
<p>QHSN14 High Quality Living Environment To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.</p>	<p>The proposed development supports the provision of high-quality living environment to both its residents and for the wider area by providing accessible public open space and close to existing local facilities.</p>
<p>QHSN16 Accessible Built Environment To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.</p>	<p>The proposed development has been carefully designed to respond to the existing built-up area surrounding the site. The proposal includes both communal and public open spaces that are accessible and offer high quality amenity space.</p> <p>The space is designed to have appropriate level access, gentle gradients and lifts where appropriate. Please refer to chapter 8 of the Architectural Design Statement by CWOB for further details.</p>
<p>QHSN17 Sustainable Neighbourhoods To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.</p>	<p>This proposal is for an attractive development which will provide for a new apartment type and tenure within the area. It will also provide for a new attractive public realm and high quality community facilities for the residents of the proposed development.</p> <p>The existing residential units are the wider area which comprise mainly larger 3+ bed houses at present. The proposed scheme will overall improve the mix of units on offer with 91% of the scheme being made up of 1 bed and 2 beds. The remainder of the scheme is made up of 3 bed units. This in turn will introduce a more balanced form of development to this area, appealing to a broad ranging demographic e.g. young families to single professionals and empty nesters.</p>
<p>QHSN22 Adaptable and Flexible Housing To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for</p>	<p>All units are sized to allow some minor internal reconfiguration and adaptation.</p>

Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015	
QHSN25 Housing for People with Disabilities To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which facilitates equality of outcome, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/supported living units, lifetime housing, and adaptation of existing properties.	The units of proposed development are designed to be suitable for older people/mobility impaired people and people with disabilities. Please refer to chapter 8 of the Architectural Design Statement by CWOB for further details.
QHSNO11 Universal Design To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019.	All of the apartments meet or exceed the minimum standards. The units are designed to be suitable for older people/mobility impaired people and people with disabilities. Please refer to chapter 8 of the Architectural Design Statement by CWOB for further details.
QHSN34 Social, Affordable Purchase and Cost Rental Housing To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH 'Social Housing Strategy 2020' and support the realisation of public housing.	Please see the Part V pack submitted with this application. This is in accordance with this policy.
QHSN36 High Quality Apartment Development To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.	The proposed development will provide a high quality apartment development that includes quality private, communal and public amenity space and is located in close proximity to local facilities.
QHSN37 Houses and Apartments To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.	The proposed development will provide Part V social housing suitable serving family, individuals, couples and empty nesters.
QHSN38 Housing and Apartment Mix	This proposal is for an attractive development which will provide for a new apartment type and

<p>To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.</p>	<p>tenure within the area. The overall development at Hartfield Place will also provide for a new attractive public realm and high quality community facilities for the residents of the proposed development.</p>
<p>QHSN39 Management To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.</p>	<p>All public/communal spaces are generously proportioned and regular in size to facilitate maintenance and up keep.</p>
<p>QHSN47 High Quality Neighbourhood and Community Facilities To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.</p>	<p>A range of community facilities such as schools, public parks, amenity areas and retail services are already available for the site within the vicinity. The provision of additional population will support the vitality and vibrancy of these businesses.</p> <p>The proposed development as per the permitted SHD development will also provide</p> <ul style="list-style-type: none"> - New public plaza located off the Swords Road - Creche - Commercial unit - Large Public Park which includes a MUGA, two children's playgrounds and two large kick about areas - New public footpath along the Swords Road.
<p>QHSN49 Phasing To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.</p>	<p>As set out in the CEMP prepared by PUNCH, it is estimated that the construction programme for the works associated with the proposed works will last approx. 36 months from the date of commencement. This estimation is based on the typical construction programmes for other similar developments that are currently underway. It is envisaged that construction of the proposed building and external works will be carried out over three phases as outlined in the Architect's Phasing Drawing PE18138-CWO-ZZ-RL-DR-A-0003. The Main Contractor will be required to prepare a detailed construction programme as part of their tender proposal.</p>

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<p>QHSN55 Childcare Facilities</p> <p>To facilitate the provision of appropriately designed and sized fit-for-purpose affordable childcare facilities as an integral part of proposals for new residential and mixed-use developments, subject to an analysis of demographic and geographic need undertaken by the applicant in consultation with the Dublin City Council Childcare Committee, in order to ensure that their provision and location is in keeping with areas of population and employment growth.</p>	<p>The permitted scheme consisted of c. 446sq.m creche with an associated outdoor play area of c. 118sq.m located at the ground floor of block A. Through the rationalisation of Block A, the creche now proposed has a better, more cohesive layout so while smaller in sqm will accommodate 65 children (63 originally permitted) and will work more efficiently. Furthermore, the amended creche has a larger crèche external play space (+ 60.7sqm) to the east of block is permitted. There is also better separation from the apartment block than in the permitted application.</p>

Chapter 8: Sustainable Movement and Transport

Policy	Evaluation of Consistency
<p>SMT1 Modal Shift and Compact Growth</p> <p>To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.</p>	<p>The replacement of the basement with a semi-basement and the resulting reduction in parking have been addressed in detail by Punch Consulting Engineers and submitted with this application. The proposal includes 163 residential parking spaces for Blocks A-E.</p> <p>The wider Hartfield Place development, including Blocks F & G, offers 189 residential parking spaces for Blocks A-F, which consist of 472 residential units, resulting in a parking ratio of 0.40 spaces per unit. Additionally, 12 parking spaces will be reserved for car club use, and 11 spaces (5% of the total 212 spaces) will be designated for disabled users. For more detailed information, refer to Chapter 12 of the Punch Consulting Engineers Memorandum on Car Parking Proposals.</p> <p>Walking and cycling are prioritised throughout the scheme. The site's proximity to high quality public transport and the provision of bicycle spaces to ensure a modal shift to a more sustainable mode of transport is encouraged on this infill site.</p> <p>The site is highly accessible and is well connected with public transport services. A high frequency bus service is within a short walk from the site.</p>
<p>SMT2 Decarbonising Transport</p> <p>To support the decarbonising of motorised transport and facilitate the rollout of alternative</p>	<p>EV charging facilities are provided for within the scheme. Please refer to TTA prepared by PUNCH for full details regarding EV infrastructure.</p>

<p>low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.</p>	
<p>SMT4 Integration of Public Transport Services and Development To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places</p>	<p>The site is highly accessible and is well served by public transport as it adjoins the Swords Road QBC and proposed Bus Connects spine route. The NTA map below shows the variety of bus services available in the vicinity providing access to the city centre, Dublin Airport, and local centres including Santry, Beaumont and DCU.</p> <p>The Swords Road interface is to facilitate the Bus connects Spine Route A and cycle lane at this location. The A Route will have services running past the site from Dublin Airport, Swords and Beaumont through the City Centre to Dundrum, Tallaght, Nutgrove and Ballycullen with 10 min frequency.</p> <p>The site is well connected to excellent public transport services. Dublin Bus Stops 237, 7851, 214 and 204 are all within c. 100m of the subject site. Bus routes which serve this area are 1, 15, 16, 16D, 33, 41, 41B, 41C, 41D, 16 and N4. These existing bus routes connect the area to Sandymount, Monkstown, Charlestown, Sandyford Business District, Dundrum, Dublin Airport, Dublin City Centre and Enniskerry.</p>
<p>SMT5 Mobility Hubs To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.</p>	<p>12 no. parking spaces dedicated for car club use only are proposed for inclusion in this residential apartment component of car parking. It is proposed to use the scheme operated by GoCar but an equivalent shared car scheme could be used. A letter of intent from GoCar is provided in Appendix C of the MMP prepared by Punch. In addition to this there are significant quantum of bike storage facilities across the site. These facilities can also store micro mobility forms of transport. It is given the sites location this is an ideal site to be car free and use alternative modes of transport.</p>
<p>SMT6 Mobility Management and Travel Planning To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.</p>	<p>The proposed development encourages a modal shift to sustainable transport methods. The scheme incorporates a reduced car parking provision. Please see the Traffic and Transportation & Mobility Management Plan prepared by PUNCH submitted as part of this application.</p>
<p>SMT7 Travel Plans for New and Existing Developments</p>	

<p>To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.</p>	
<p>SMT9 Public Realm in New Developments To encourage and facilitate the co-ordinated delivery of high-quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.</p>	<p>Walking and cycling are prioritised throughout the scheme with minimal vehicular access into the scheme and a high-quality public realm.</p> <p>The proposed development has been designed to a high quality. The proposed blocks will provide a strong frontage to the internal streets and open spaces while also respecting the existing developments adjacent to the site. The proposed public realm and open spaces will be easily maintained by the management company.</p>
<p>SMT12 Pedestrians and Public Realm To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.</p>	<p>The proposed design will provide a public realm that prioritizes ease of movement for pedestrians and cyclists. The development will consist of large public and community open spaces that will be landscaped to human scale. A diverse series of spaces will provide increased legibility, creating an area with clarity, identifiable, overlooked and navigable. This will promote walking and cycling connections through the site to enhance sustainable transport modes and connectivity. entering the proposed development.</p>
<p>SMT13 Urban Villages and the 15-Minute City To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.</p>	<p>There are a wide range of facilities within a 15-minute journey from the site, including parks, gym, sports clubs, community centre and schools.</p>
<p>SMT16 Walking, Cycling and Active Travel To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.</p>	<p>We anticipate that the majority of cyclists will be travelling south along Swords Road heading towards City Centre, with this in mind the main point of access for cyclists will be from the southern end of the site.</p> <p>To accommodate this higher volume of cyclists, a dedicated 4.0m wide shared active travel facility pathway will run to the north and east of block C providing safe, convenient and direct access for cyclists to the bike storage areas at the south of the site. To the south of block C there is also a pedestrian and cyclist access route, with a shared surface to the south, leading to block E, F and G.</p> <p>Cyclists approaching the site from the north have the option of travelling along Swords Road (directly west of the site) and entering the site via the shared active travel facility, this is as</p>

	<p>permitted. Alternatively, cyclists approaching the site from the north have the option to cycle along the entrance to the north and disembarked the bikes and walk their chosen bike storage space. Generous space has been provided for residents to disembark their bike and walk alongside any pedestrians using the site.</p> <p>Please refer to the Car and Cycle Strategy Report (CWOB) which provides further details regarding the provision of cycle parking.</p>
<p>SMT18 The Pedestrian Environment</p> <p>To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.</p>	<p>The layout proposes to maximise the permeability and connectivity through the site prioritising the quality of open space within the development</p> <p>This will also be overlooked by the apartments making public open space a safe and attractive place to be.</p>
<p>SMT010 Walking and Cycling Audits</p> <p>Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.</p>	<p>Refer to PUNCH documentation for a full breakdown of walking and cycling facilities within the environs of the proposed development.</p>
<p>SMT27 Car Parking in Residential and Mixed Use Developments</p> <p>(i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.</p> <p>(ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.</p> <p>(iii) To safeguard the residential parking component in mixed-use developments</p>	<p>The replacement of the basement with a semi-basement and the resulting reduction in parking have been addressed in detail by Punch Consulting Engineers and submitted with this application. The proposal includes 163 residential parking spaces for Blocks A-E.</p> <p>The wider Hartfield Place development, including Blocks F & G, offers 189 residential parking spaces for Blocks A-F, which consist of 472 residential units, resulting in a parking ratio of 0.40 spaces per unit. Additionally, 12 parking spaces will be reserved for car club use, and 11 spaces (5% of the total 212 spaces) will be designated for disabled users. For more detailed information, refer to Chapter 12 of the Punch Consulting Engineers Memorandum on Car Parking Proposals.</p>
<p>SMT29 Expansion of the EV Charging Network</p> <p>To support the expansion of the EV charging network by increasing the provision of designated</p>	<p>EV charging facilities are provided for within the scheme. Please refer to TTA prepared by PUNCH for full details regarding EV infrastructure.</p>

charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy

Chapter 15: Development Standards

Policy	Evaluation of Consistency
15.3 Environmental Assessment - EIA/AA/Ecological Impact Assessment	
15.3.1 Environmental Impact Assessment Environmental Impact Assessments (EIA) consider whether development projects either alone or in combination are likely to have significant effects on the environment.	<p>The proposed development is below the thresholds of Schedule 5 of the Planning and Development Regulations.</p> <p>However, it was deemed appropriate to prepare an addendum to the EIAR, which had submitted as part of the application for ABP Reg Ref 313289-22, in line with good planning practice. The proposed amendments do not impact the relevant classes of development for EIA thresholds. Accordingly, an EIA is not mandatory for the proposed amendments.</p> <p>Please refer to EIAR Addendum Report which accompanies this application.</p>
15.3.2 Appropriate Assessment Appropriate Assessment (AA) under Article 6 of the Habitats Directive considers whether or not a proposed plan or project would adversely affect the integrity of a European Site.	<p>Please refer to the letter prepared by JBA Consulting which concluded;</p> <p><i>"On the basis of the screening exercise carried out above, it can be concluded that the possibility of any likely significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available."</i></p> <p>Please refer to the AA Screening for further details.</p>
15.3.3 Ecological Impact Assessment An Ecological Impact Assessment should be carried out for all developments within or adjacent to any sensitive habitat, ecological corridor, specific landscape character area or which has the potential to contain protected habitats or species.	<p>Please refer the Biodiversity Chapter within the EIAR Addendum Report.</p>
15.4 Key Design Principles	
15.4.1 Healthy Placemaking All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which are designed to facilitate active travel including walking and cycling, close to public transport	<p>The scheme will provide good segregation of vehicle and pedestrians/cyclists with the vast majority of the site free from cars.</p>

<p>insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city</p>	<p>A very safe walking and cycling environment will be provided for residents with a network of paths located around the development.</p> <p>Public open spaces shall be overlooked as far as practicable to achieve maximum passive surveillance.</p>
<p>15.4.2 Architectural Design Quality Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.</p>	<p>The materials used are high quality and will ensure the design of the scheme contributes positively towards the townscape and urban realm.</p>
<p>15.4.3 Sustainability and Climate Action Development proposals will be expected to minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates.</p>	<p>Please refer to the Energy Analysis Report prepared by IN2.</p> <p>We also refer you to the Operational and Resource Waste Management Plan which set out the approach to waste management once the site is operational and the Resource Waste and Management Plan prepared by AWN.</p>
<p>15.4.4 Inclusivity and Accessibility Development proposals, including all new large scale developments..... must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.</p>	<p>The proposed development is designed to be accessible to all.</p>
<p>15.4.5 Safe and Secure Design All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).</p>	<p>The scheme is designed to ensure residents and visitors are interacting with a safe and secure environment.</p> <p>Public open space and communal areas are designed so that active passive surveillance is in operation</p>
<p>15.5.4 Height Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.</p>	<p>Noted. The permitted buildings ranges from 4 to 7 stories, with modest increases proposed to buildings B, D and E increasing by approx. 0.17m, 1.81m & 1.81m respectively. The proposed scheme ranges from 4-8 stories.</p> <p>The increased building height is minor, and as can be seen from the photomontages and the building proposed, while having an impact on the area, will still have a positive impact, improving the street scene.</p> <p>For further detail please refer to the Architectural Design Statement and associated drawings prepared by CWOB Architects.</p>

<p>15.5.5 Density</p> <p>New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood.</p>	<p>The proposed density of the overall site (A-G) equates to c. 173 uph. This density respects the permitted density which is also 173 uph.</p> <p>This density is in line with the site conditions, the need for compact growth and the policies of a 15 minute city. This density make best use of this scarce resource – land.</p>																			
<p>15.5.6 Plot Ratio and Site Coverage</p> <p>Appendix 3, Table 2 provides indicative plot ratio and site coverage standards.</p> <table><tr><th>Area</th><th>Indicative Plot Ratio</th><th>Indicative Site Coverage</th></tr><tr><td>Central Area</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration Area</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation Area</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential Area</td><td>1.0-2.5</td><td>45-60%</td></tr></table>	Area	Indicative Plot Ratio	Indicative Site Coverage	Central Area	2.5-3.0	60-90%	Regeneration Area	1.5-3.0	50-60%	Conservation Area	1.5-2.0	45-50%	Outer Employment and Residential Area	1.0-2.5	45-60%	<p>For the entire development (A-G):</p> <ul style="list-style-type: none">- Plot ratio is 1.49- Site coverage is 23.69% <p>This is similar to that of the permitted development.</p>				
Area	Indicative Plot Ratio	Indicative Site Coverage																		
Central Area	2.5-3.0	60-90%																		
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<p>15.5.7 Materials and Finishes</p> <p>All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application.</p>	<p>Please see the Architecture Design Statement and Building Life Cycle for further information.</p>																			
<p>15.5.8 Architectural Design Statements</p> <p>Table 15-2: Information Requirements for Design Statements</p> <table><tr><td>Residential Developments</td></tr><tr><td>Site Location and Description</td></tr><tr><td>Context and Setting</td></tr><tr><td>Urban Design Rationale</td></tr><tr><td>Design Evolution / Alternatives Considered</td></tr><tr><td>Block Layout and Design</td></tr><tr><td>Site Connectivity and Permeability</td></tr><tr><td>Height, Scale and Massing</td></tr><tr><td>Materials and Finishes</td></tr><tr><td>Open Space (Private, Communal, Public)</td></tr><tr><td>Public Realm Contribution</td></tr><tr><td>Compliance with Internal Design Standards</td></tr><tr><td>Daylight and Sunlight</td></tr><tr><td>Overlooking, Overbearing, Overshadowing</td></tr><tr><td>Car and Cycle Parking</td></tr><tr><td>Management/Lifecycle Report</td></tr><tr><td>Compliance with DMURS</td></tr><tr><td>Safety and Security</td></tr><tr><td>Universal Access</td></tr></table>	Residential Developments	Site Location and Description	Context and Setting	Urban Design Rationale	Design Evolution / Alternatives Considered	Block Layout and Design	Site Connectivity and Permeability	Height, Scale and Massing	Materials and Finishes	Open Space (Private, Communal, Public)	Public Realm Contribution	Compliance with Internal Design Standards	Daylight and Sunlight	Overlooking, Overbearing, Overshadowing	Car and Cycle Parking	Management/Lifecycle Report	Compliance with DMURS	Safety and Security	Universal Access	<p>CWOB Architects have prepared an Architectural Design Statement which analyses the context and constraints of the site and includes a detailed design of the development. The Design Statement provides all of this information listed in this section.</p>
Residential Developments																				
Site Location and Description																				
Context and Setting																				
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Compliance with DMURS																				
Safety and Security																				
Universal Access																				
<p>15.5.9 Models and Photomontages</p>	<p>Modelworks have completed the verified views and CGI's for the site. These provide a realistic view of what the development will look like once it is completed.</p>																			
<p>15.6 Green Infrastructure and Landscaping</p>																				
<p>15.6.2 Surface Water Management and SuDs</p> <p>All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance</p>	<p>SUDS have been incorporated which ensures that the quantity and quality of the runoff will revert to a green field rate. However, the amendments to blocks A to E, the subject of this application, will not result in a significant</p>																			

15.6.3 Green / Blue Roofs Dublin City Council will require all new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23.	change to that of the permitted parent permission.
15.6.5 Urban Greening All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc	Please refer to the landscape architecture pack prepared by Parkhood Landscape Architects.
15.6.7 Landscape Design Rationale The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications	Parkhood Landscape Architects have prepared a Landscape Report including Green Infrastructure Plan as part of this planning application. The report provides details on the following items: Public open space provision, landscape proposals, boundary details, roof areas, planting schedule etc. Please see the Landscape Report for more detailed information.
15.6.8 Landscape Plans and Design Reports Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	
15.6.12 Public Open Space and Recreation	The proposals public open space provision amounts to 3,386m2 which is the equivalent of 23.16% of the total site area. This is an increase from the 22.55% POS previous permitted.
15.6.13 Boundary Treatments Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.	CWOB Architecture and Parkhood Landscape Architecture documentation provide detailed design of boundary treatments. The communal open space will be enclosed with a 1.2m high steel railing which has been selected to tie in with the architecture and provide a contemporary boundary treatment to the communal open space.
15.7 Climate Action	
15.7.2 District Heating	An Energy and Sustainability Report has been prepared by IN2. Please refer to this document for information on Building Regulations Compliance and DEAP Methodology and Analysis.
15.7.3 Climate Action and Energy Statement proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.	
15.8 Residential Development	
15.8.1 Quality/Making Sustainable Neighbourhoods Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including	The proposed development has had regard to the guidance listed within section 15.8.1. These are discussed in detail above under the National Planning guidance section.

<p>'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads and Streets (2019) and Design Manual for Quality Housing (2022).</p>							
<p>15.8.4 Childcare In order to meet this objective, one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be provided in all new mixed use and residential schemes.</p>	<p>The scheme will deliver a 399 sq.m creche within the ground floor of block A. The creche will have an external play area of c. 188 sq.m and can accommodate approx. 65 full time child places.</p>						
<p>15.8.6 Public Open Space Table 15-4: Public Open Space Requirements for Residential Development</p> <table border="1"> <thead> <tr> <th>Landuse / Zoning</th><th>Requirement (minimum)</th></tr> </thead> <tbody> <tr> <td>Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)</td><td>10%</td></tr> <tr> <td>Residential development (Z12) (Z15)</td><td>25%</td></tr> </tbody> </table>	Landuse / Zoning	Requirement (minimum)	Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)	10%	Residential development (Z12) (Z15)	25%	<p>The proposals public open space provision amounts to 3,386m² which is the equivalent of 23.16% of the total site area. This is an increase from the 22.55% POS previous permitted.</p>
Landuse / Zoning	Requirement (minimum)						
Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)	10%						
Residential development (Z12) (Z15)	25%						
<p>15.8.8 Play Infrastructure In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition</p>	<p>As per the parent permission, the MUGA, and play areas will remain as permitted.</p> <p>Within the amended application, we have also allowed for natural play in the communal open space and within closer proximity to blocks A-E.</p> <p>Please refer to the landscape architecture pack prepared by Parkhood Landscape Architects.</p>						
<p>15.8.11 Management Companies/Taking in Charge</p>	<p>A strip of land along Swords Road as to be Taken in Charge as per the parent permission. This amendment application seeks no changes in this regard.</p>						
<p>15.11 House Developments</p>							
<p>15.11.1 Floor areas Houses shall comply with the principles and standards outlined in Section 5.3: 'Internal Layout and Space Provision' contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007)</p>	<p>Please refer to the HQA prepared by Urban Agency Architects. The proposed house floor areas are in full compliance of the Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities'.</p>						
<p>15.11.2 Aspect, Daylight / Sunlight and Ventilation The orientation and layout of house units should maximise the use of natural daylight and sunlight as much as possible. Where feasible, the main habitable rooms (living / kitchen) should have south and/or west facades. Rear private garden</p>	<p>Please refer to the Sunlight Daylight Analysis prepared by IN2. All rooms were assessed for the Spatial Daylight Autonomy (SDA) methodology as detailed in the BRE Guide.</p> <p>In summary, this report confirms that best practices for daylight and sunlight availability</p>						

<p>should be sufficiently sized and orientated to ensure direct sunlight access is achieved for part of the day on March 21st. Living rooms shall not be lit solely by roof lights. Bedrooms solely lit by roof lights will be considered in certain circumstances on a case by case basis. All habitable rooms must be naturally ventilated and lit. Further details and guidelines for Daylight and Sunlight Assessments are set out in Appendix 16.</p>	<p>have been applied to the proposed amendment to the Hartfield development compared to the parent permission (SHD ABP 313289-22), achieving a very high 99% compliance rate for internal daylight availability.</p>
<p>15.11.3 Private Open Space A minimum standard of 10 sq. m. of private open space per bedspace will normally be applied. A single bedroom represents one bedspace and a double bedroom represents two bedspaces. Generally, up to 60-70 sq. m. of rear garden area is considered sufficient for houses in the city. In relation to proposals for house(s) within the inner city, a standard of 58 sq. m. of private open space per bedspace will normally be applied. These standards may be relaxed on a case by case basis subject to a qualitative analysis of the development.</p>	<p>Please refer to the HQA prepared by CWOB Architects. All housing unit's private open space meet or exceed the standard as set out in the development plan.</p>
<p>15.11.4 Separation Distances (Houses) At the rear of dwellings, there should be adequate separation between opposing first floor windows. Traditionally, a separation of about 22 m was sought between the rear first floor windows of 2-storey dwellings but this may be relaxed if it can be demonstrated that the development is designed in such a way as to preserve the amenities and privacy of adjacent occupiers. Careful positioning and detailed design of opposing windows can prevent overlooking with shorter back-to-back distances and windows serving halls and landings which do not require the same degree of privacy as habitable rooms.</p>	<p>Please refer to the Site Layout Plan prepared by CWOB Architects. All units meet separation distance standards.</p>
15.9 Apartment Standards	
<p>15.9.1 Unit Mix Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p>	<p>This proposed apartment development (A-E) provides for 150 no. 1 beds (44.9%), 153 no. 2 beds (45.8%) and 31 no. 3 beds (9%).</p> <p>The proposed revised mix is considered to provided significant gains over that permitted by removing all studios and more than tripling the number of 3 bed apartments. This unit mix is in accordance with the Development Plan as well as the Apartment Guideline requirements.</p> <p>The proposed unit mix is in compliance with SPPR1.</p>

15.9.2 Unit Size / Layout			CWOB Architects have prepared a Housing Quality Assessment which outlines unit area requirements vs what each apartment achieves.
Table 15-5: Minimum Floor Area Requirements for Apartments			
Unit Type	Bedspace	Floor Area Requirement (min)	
Studio	1 bedspace	37 sq. m.	
1 bed	2 bedspaces	45 sq. m.	
2 bed	4 bedspaces	73 sq. m.	
3 bed	5 bedspaces	90 sq. m.	All units are in accordance with this section of the development plan.
15.9.3 Dual Aspect Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations			In accordance with the development plan, 55% of the apartment units are dual aspect for blocks A-E, increasing to 57% for the entire development (blocks A-F).
15.9.4 Floor to Ceiling Height A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided.			The proposed development meets this minimum ceiling height standard. A ceiling height of 2.7m has been applied across all floors throughout the development.
15.9.5 Lift, Stair Cores and Entrance Lobbies Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.			The residential floors of the proposed development provides a maximum of 12 no. units per core or less.
15.9.6 Internal Storage Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.			The Housing Quality Assessment prepared by CWOB Architect’s demonstrates compliance with internal storage standards.
15.9.7 Private Amenity Space Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.			The Housing Quality Assessment prepared by CWOB Architect’s demonstrates compliance with private amenity space standards.
15.9.8 Communal Amenity Space The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.			The Development Executive Summary & Schedule prepared by CWOB Architect’s outlines residential amenity provision. The entire development provides 3,743m2 of external communal open space.
15.9.9 Roof Terraces			A roof terrace is provided in the Block F and Block G apartment buildings. These are permitted

	buildings and are not the subject of this amendment application.
<p>15.9.10 Internal Communal Facilities</p> <p>Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.</p>	<p>Communal indoor amenity spaces are provided within L00 and L01 of the Block A apartment building. These spaces include a gym/yoga room, residents' lounge and access to the café. The internal communal amenity space amounts to 357sq.m, the café amounts to 105sq.m. The scheme also provides a c.399.2sq.m creche facility.</p>
<p>15.9.11 Security</p> <p>New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security.</p>	<p>The provision of public and communal open space as well as residential amenities throughout the development encourages active passive surveillance.</p>
<p>15.9.12 Access and Services</p> <p>Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.</p>	<p>To accommodate this higher volume of cyclists, a dedicated 4.0m wide shared active travel facility pathway will run to the north and east of block C providing safe, convenient and direct access for cyclists to the bike storage areas at the south of the site. To the south of block C there is also a pedestrian and cyclist access route, with a shared surface to the south, leading to block E, F and G.</p> <p>Cyclists approaching the site from the north have the option of travelling along Swords Road (directly west of the site) and entering the site via the shared active travel facility, this is as permitted.</p> <p>With regards to vehicular access, entering the site along the northern boundary, access to the resident semi-basement car parking is provided via a ramp approach located between apartment Blocks A and D. This location remains unchanged from the permitted scheme. The access control to the semi-basement car park will ensure secure parking for the residents.</p> <p>The proposed development is designed in accordance with Part M building regulations.</p>
<p>15.9.13 Refuse Storage</p> <p>Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the</p>	<p>An Operational Waste & Recycling Management Plan prepared by AWN is submitted as part of this planning application.</p>

<p>projected level of waste generation, types and quantities.</p> <p>All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan that clearly identifies the projected quantities of waste and the proposed waste collection strategy</p>	<p>Please refer to the OWRMP and CWOB Architect's drawings for the location and size of bin storage areas.</p>
<p>15.9.14 Lifecycle Reports</p> <p>All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p>	<p>CWOB have prepared a Building Life Cycle Report as part of this planning application.</p>
<p>15.9.15 Operational Management and Maintenance</p> <p>All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p>	<p>A Building Life Cycle Report has been prepared as part of this planning application. This report details the maintenance and management of the scheme.</p>
<p>15.9.16 Microclimate – Daylight and Sunlight, Wind and Noise</p> <p>All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.</p>	<p>Please refer to the IN2 report 'Daylight and Sunlight Analysis' which has been submitted as part of this planning application. The report concludes that the scheme is entirely in compliance with the BRE Guide 3rd edition.</p>
<p>15.9.16.1 Daylight and Sunlight</p> <p>A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>	<p>The flat, low-lying nature of the existing site, and the height and orientation of the proposed blocks (when considered the extent of permitted block) indicates that the development is unlikely to create negative local wind microclimate impacts.</p>
<p>15.9.16.2 Wind</p> <p>A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme.</p>	<p>All units have been designed to prevent sound transmission in accordance with current building standards.</p>
<p>15.9.16.3 Noise</p> <p>All apartment developments should be designed as to ensure noise transmission between units and from external or internal communal areas is</p>	<p>The parent permission was submitted with an An Acoustic Design Statement has been completed by AECOM Consulting. This report concludes the following:</p> <p><i>"...desired indoor ambient noise levels for future occupant of the proposed development can be achieved through appropriate acoustic design of external building fabric. The outline sound insulation requirements of the external building</i></p>

<p>minimised. Guidance for noise reduction in building is set out in BS 8233:2014.</p>	<p><i>elements have been provided in the statement. These are based on the results of the noise survey.</i></p> <p><i>Recommendations for building services noise and vibration are provided in order to achieve suitable internal noise and vibrations levels. Noise emission limits has been provided based on DCC EHO requirement in order to avoid impact on adjoining properties."</i></p> <p>The proposed amendments will result in a development that is similar in nature and extent and will not give rise to any additional impacts from noise.</p>
<p>15.9.17 Separation Distances (Apartments) Traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Separation distances between buildings will be assessed on a case by case basis.</p>	<p>The proposed development is in excess of 22m to its nearest adjoining neighbours to the north. It is also note, given the nature of the site and the slight angle of the buildings none of these windows are directly opposing rear windows. There is no undue loss of privacy as a result of this development.</p> <p>Whilst the siting of the 5 blocks proposed generally respects the footprints of the 5 blocks permitted, the separation distance between blocks A-B, B-C, C-E and A-D have all increased. The proposed buildings are placed on the site overlooking the public and community open spaces achieving good separation distances between opposing windows above ground floor.</p> <p>Overall, there is sufficient separation distances between opposing windows and balconies of the proposed buildings to the existing buildings.</p>
<p>CU025 SDRAs and large Scale Developments All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of</p>	<p>As set out above this is not a <i>new</i> LRD application. Furthermore, the proposed development, which has a similar height, scale and massing as the permitted development, does not have a proposed additional floor space of 10,000sqm. Therefore, this policy is not triggered.</p> <p>This is in line with the approach which has been taken by DCC on other permitted LRD developments which have amended permitted SHD permissions.</p>

<p>the area. Such spaces must be designed to meet the identified need.</p> <p>*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.</p>	
15.15 Built Heritage and Archaeology	
<p>15.15.1.3 Best Practice</p> <p>The development shall be carried out in accordance with the documents listed in this section of the development plan.</p>	<p>The proposed development is in accordance with documents listed.</p>
<p>15.15.1.4 Basements</p> <p>New basement development in the medieval core and known medieval sites shall be avoided. Approved basements may be rescinded where undue damage to in situ archaeological deposits will occur as a result.</p>	<p>The proposed amendments include the replacement of the permitted basement with a semi-basement under blocks D/E extending under a portion of the communal courtyard.</p> <p>ACL Consulting have prepared a Basement Impact Assessment which is submitted a part of this planning application.</p>
15.18 Environmental Management	
<p>15.18.1 Construction Management</p> <p>All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan. In the event of a grant of permission, and on appointment of a contractor, a final construction management plan will be required to be agreed with the Planning Authority</p>	<p>PUNCH have prepared a Management Plan submitted as part of this planning application.</p>
<p>15.18.1.1 Construction Traffic Management Plan</p> <p>A Construction Traffic Management Plan (CTMP) is a key document that aims to reduce possible impacts which may occur during the construction period of a proposed development. An applicant/developer is responsible for ensuring construction activities are managed in accordance with the CTMP.</p>	<p>This CEMP outlines clearly the mitigation measures and monitoring proposals that are required to be adhered to in order to complete the works in an appropriate manner at the proposed LRD amendment to a permitted SHD development at a site located at Swords Road,</p> <p>The construction phase works will be designed to approved standards, which include specified materials, standards, specifications and codes of practice. The design of the project has considered environmental issues and this is enhanced by the works proposals</p>
<p>15.18.1.2 Considered Construction</p> <p>Considered Construction seeks to improve the image of the construction industry which requires registered contractors to commit to care about appearance, respect the community, protect the environment, secure everyone's safety and value their workforce.</p>	<p>Please refer to the report titled CEMP prepared by PUNCH for full details.</p>
<p>15.18.1.3 Phasing</p> <p>Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial</p>	<p>It is estimated that the construction programme for the works associated with the proposed works will last approx. 36 months from the date of commencement. It is envisaged that construction of the proposed building and external works will be carried out over three phases as outlined in the CWOB Architect's Phasing Drawing.</p>

<p>development in excess of 5,000 sq. m. and residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.</p>	<p>An outline phasing strategy is set out in the CEMP but this is subject to detailed development following appointment of a Contractor.</p>
<p>15.18.1.4 Hours of Operation On sites where noise generated by construction would seriously affect residential amenity, the site and building works must be carried out between 0700 and 1800 hours Monday to Friday only, and between 0800 and 1400 hours on Saturdays only. No works shall be carried out on Sundays or bank holidays.</p>	<p>Section 14 of the Construction Management Plan states the following:</p> <p><i>“Construction work will take place during normal working hours as follows:</i></p> <ul style="list-style-type: none"> • <i>Monday to Friday 08.00 – 19.00</i> • <i>Saturday 08.00 – 14.00”</i> <p>The design team welcome a condition by the council to alter hours of operation if necessary.</p>
<p>15.18.2 Waste Management All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both and Construction and Operational Waste Management Plan.</p>	<p>AWN prepared an Operational Waste & Recycling Management Plan submitted as part of this application.</p>
<p>15.18.4 Basements It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.</p>	<p>The proposed amendments include the replacement of the permitted basement with a semi-basement under blocks D/E extending under a portion of the communal courtyard.</p> <p>ACL Consulting have prepared a Basement Impact Assessment which is submitted a spart of this planning application.</p>
<p>15.18.9 Noise Dublin City Council will have regard to the Dublin Agglomeration Noise Action Plan 2018– 2023 when assessing planning applications (see also Section 9.5.8: Noise Pollution). Where it is considered that a proposed development is likely to create a disturbance due to noise, a condition may be imposed by the planning authority on any planning permission limiting the hours of operation and level of noise generation.</p>	<p>AWN prepared an Environmental Noise Survey which is submitted as part of this planning application. This survey outlines mitigation measures which must be adhered to in order to prevent noise disturbance on the surrounding area.</p> <p>The Parent Permission EIAR identified potential noise and vibration impacts at the construction and operation phases. It also sets out a series of Mitigation Measures for both the Construction and Operational Phase of the development.</p> <p>The proposed amendments will result in a development that is similar in nature and extent and will not give rise to any additional impacts at construction or operational phases and will not result in any material changes to any identified potential or significant impacts that require consideration of additional mitigation or</p>

	monitoring measures. Please refer to Appendix B, Traynor Environmental note of the EIAR Addendum Report.
15.18.10 Air Quality All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan.	<p>The EIAR identified potential air, dust and climatic impacts at the construction and operational phases. It also included Mitigation Measures to address any potential impacts at a Construction and Operational Phases.</p> <p>The proposed amendments are similar in nature to the permitted and will not give rise to any additional impacts at the construction or operational phases and will not result in any material changes to any identified potential or significant impacts that require consideration or additional mitigation or monitoring measures. Please refer to Appendix B, Traynor Environmental note of the EIAR Addendum Report.</p>
15.18.11 Ground Investigation Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application.	<p>A ground investigations report will be included in the final planning application.</p> <p>Please refer to Tunnel Impact Assessment and Basement Impact Assessment prepared by ACL Consulting for further information.</p>
15.18.14 Flood Risk Management All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail	<p>Please refer to the SSFRA prepared by HYDROCARE consulting engineers.</p>

Appendix 3 Achieving Sustainable Compact Growth Policy for Density and Building Height in the City	
At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height.	The proposal includes heights up to 8 storeys which is within this range. This is the same as the permitted development which this proposal is amending.
The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity.	The proposed development, as with the parent permission it is amending, respects the existing character of the area and has been designed to respect both existing and future residential amenity.
All proposals for higher densities must demonstrate how the proposal contributes to healthy place making, liveability and the identity of an area, as well as the provision of community	The site comprises a vacant brownfield site that was previously as a compound. The proposal will result in a significant improvement in the landscaping, planting and biodiversity on site.

facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods			<p>In addition, It provides an attractive new public open space</p> <p>The permitted SHD permission provides a significant new public open space of over 0.5ha which will be available to the wider community and will include a MUGA. In addition the development will be served by dedicated communal open space include a large courtyard and a number of roof gardens. The recreational needs for a range of different ages including children, adults and the elderly will be facilitated.</p>															
<p>As a general rule the following density ranges will be supported in the city.</p> <table><tr><td>Location</td><td>Net Density Ranges (uph)</td></tr><tr><td>City Centre and Canal Belt</td><td>100-250</td></tr><tr><td>SDRA</td><td>100-250</td></tr><tr><td>SDZ/LAP</td><td>As per SDZ Planning Scheme/LAP</td></tr><tr><td>Key Urban Village</td><td>60-150</td></tr><tr><td>Former Z6</td><td>100-150</td></tr><tr><td>Outer Suburbs</td><td>60-120</td></tr></table>			Location	Net Density Ranges (uph)	City Centre and Canal Belt	100-250	SDRA	100-250	SDZ/LAP	As per SDZ Planning Scheme/LAP	Key Urban Village	60-150	Former Z6	100-150	Outer Suburbs	60-120	<p>The proposed density of the overall site (A-G) equates to c. 173 uph. This is similar to the permitted density .</p>	
Location	Net Density Ranges (uph)																	
City Centre and Canal Belt	100-250																	
SDRA	100-250																	
SDZ/LAP	As per SDZ Planning Scheme/LAP																	
Key Urban Village	60-150																	
Former Z6	100-150																	
Outer Suburbs	60-120																	
<p>There will be a general presumption against schemes in excess of 300 units per hectare</p>			<p>For the entire site, the proposed density of 173 uph is well below 300uph and is considered acceptable for this site.</p>															
<p>All applications should be accompanied by a calculation of density: units per ha and bed spaces per ha, plot ratio and site coverage</p>			<p>The proposal in its entirety has a density of 173 units per ha, there is 472 units across this site which is c.272 bedspaces per hectare, a site coverage of 23.69% and a plot ratio of 1.49. This is similar to the permitted scheme.</p>															
<p>Indicative Plot Ratio and Site Coverage set out below.</p> <table><tr><td>Area</td><td>Plot Ratio</td><td>Site Coverage</td></tr><tr><td>Central</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential</td><td>1.0-2.5</td><td>45-60%</td></tr></table>			Area	Plot Ratio	Site Coverage	Central	2.5-3.0	60-90%	Regeneration	1.5-3.0	50-60%	Conservation	1.5-2.0	45-50%	Outer Employment and Residential	1.0-2.5	45-60%	<p>For the entire development:</p> <ul style="list-style-type: none">- Plot ratio is 1.49- Site coverage is 23.69% <p>It is noted that these are indicative standards. The plot ratio is appropriate for this site however, the site coverage is lower than the standards, given the site’s institutional zoning. This is the same as the permitted scheme.</p>
Area	Plot Ratio	Site Coverage																
Central	2.5-3.0	60-90%																
Regeneration	1.5-3.0	50-60%																
Conservation	1.5-2.0	45-50%																
Outer Employment and Residential	1.0-2.5	45-60%																
<p>Public Transport Corridors</p> <p>There is recognised scope for height intensification and the provision of higher densities at designated public transport stations</p>			<p>The site is highly accessible and is well served by public transport as it adjoins the Swords Road QBC and proposed Bus Connects spine route. The NTA map below shows the variety of bus</p>															

and within the catchment areas of major public transport corridors including:

- Bus connects/Core Bus Corridors (CBC's)
- Luas
- Metrolink
- DART

Development proposals will primarily be determined by reference to the proximity of new public transport infrastructure and to the area character. Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan. Highest densities will be promoted at key public transport interchanges or nodes.

The capacity of public transport will also be taken into consideration in considering appropriate densities and must be demonstrated by the applicant, particularly where such public transport infrastructure is in the pipeline and not yet developed.

Where a proposal for increased height and density is planned adjacent to proposed public transport infrastructure, the applicant must consider appropriate phasing and sequencing of development to ensure that an appropriate scale and intensity of development, coupled with adequate social and physical infrastructure, is delivered in tandem with the delivery of such public transport infrastructure.

It is acknowledged that many sites along such transport corridors are smaller infill sites. Particular regard must be had to ensure that proposals are of a coherent scale and provide a sustainable and viable extension to the existing urban fabric.

Masterplans

There will be a requirement that for any significant scheme (on sites greater than 0.5ha) seeking to increase densities and height that a masterplan is prepared. The masterplan should provide a vision for the development of the entire site area, including how new buildings, streets, blocks, pedestrian and cycling routes, parks, and publicly accessible and private open spaces will fit within the existing and planned context. It should include urban design studies to inform the architectural approach and to allow for the early testing of open

services available in the vicinity providing access to the city centre, Dublin Airport, and local centres including Santry, Beaumont and DCU.

The Swords Road interface is to facilitate the Bus connects Spine Route A and cycle lane at this location. The A Route will have services running past the site from Dublin Airport, Swords and Beaumont through the City Centre to Dundrum, Tallaght, Nutgrove and Ballycullen with 10 min frequency.

The site is well connected to excellent public transport services. Dublin Bus Stops 237, 7851, 214 and 204 are all within c. 100m of the subject site. Bus routes which serve this area are 1, 15, 16, 16D, 33, 41, 41B, 41C, 41D, 16 and N4. These existing bus routes connect the area to Sandymount, Monkstown, Charlestown, Sandyford Business District, Dundrum, Dublin Airport, Dublin City Centre and Enniskerry.

The scheme will also benefit from the proposed Collins Avenue Metrolink station which is due to be completed in 2027 subject to planning being granted. This metro station will connect Swords to Charlemont which will link the site to Dublin Airport, Irish Rail, DART, Dublin Bus and Luas services.

The subject site was included on lands within the Whitehall Framework Plan (WFP) prepared in 2008. The WFP includes the lands north of the subject site. The eastern portion of these lands have been developed as a GAA pitch, in line with the WFP, and the western portion of these lands have remained undeveloped. The WFP vision for these sites is to provide a *"vibrant mixed use urban development structured by strategic views/ vistas and connectivity, highlighted by a series of landmark/ feature corner buildings."*

<p>space quantum, sunlight, daylight, visual impact and wind effects.</p> <p>Proposals seeking to optimise densities need to demonstrate how they assist in delivering a vibrant and equitable neighbourhood - walkable, compact, green, accessible, mixed and balanced - responding positively to the existing or emerging context. Where extensive development is proposed, clear phasing and sequencing of development should be set out to ensure the appropriate delivery of social and physical infrastructure in tandem with the development. Such masterplans should also incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place to service new development – see Appendices 11, 12 and 13 of the plan.</p> <p>Higher density proposals including enhanced building height should be accompanied by a landscape and visual impact assessment with appropriate computer generated images (CGI's) and photomontages to demonstrate how the development will assimilate appropriately with the existing urban context.</p>	<p>This Framework Plan indicates a building layout either side of significant open space provided predominantly within the centre of the sites above the Port Tunnel. The indicative framework also includes a vehicular movement plan, a Quality Bus Corridor and vehicle access to the southern part of the main site from the Swords Road. It also identifies the need to maximise pedestrian and cycle connections from all directions including through the site to minimise walking distance to shops and neighbourhood facilities. It also identified the need for connections to lands south of the site to extend access and connectivity of the wider area.</p> <p>The proposal will provide a high-quality residential housing and apartment development within the existing built-up environment of Dublin City. The proposal will provide public and communal open spaces and has been designed to be as permeable and walkable for pedestrians as possible.</p> <p>Please see the drawings and documents prepared by PUNCH for details on the surface water management.</p> <p>CGIs and photomontages have been prepared by ModelWorks.</p>
<p>Landmark/tall buildings are generally considered to be those that are substantially taller than their surroundings and cause a significant change to the skyline. They are typically buildings greater than 50 metres in height.</p> <p>In terms of suitable locations, it is considered that landmark/tall building proposals are most appropriate in locations that are identified as a significant public transport interchange and/or areas for large scale regeneration and redevelopment; that are well connected centres of employment, which have the capacity to create their own character and identity and where the existing character of the area would not be adversely affected by the scale, mass and height of a landmark/tall building.</p>	<p>The proposed development is not considered to be a landmark building.</p> <p>Both the permitted scheme and this proposed development were designed to integrate into the existing area while also staying in accordance with the Whitehall Framework Plan prepared for the site.</p>

Appendix 3 Table 3: Performance Criteria in Assessing Proposal for Enhanced Height, Density and Scale

<p>Objective 1: To promote development with a sense of place and character</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, • have a positive impact on the local community and environment and contribute to 'healthy placemaking', • create a distinctive design and add to and enhance the quality design of the area, • be appropriately located in highly accessible places of greater activity and land use intensity, • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well considered design response that avoids long slab blocks, • ensure that set back floors are appropriately scaled and designed. 	<p>The text, diagrams and illustrations in Building Height Report prepared by CWOB Architect's and also in the supporting information submitted with this application for planning permission, aim to demonstrate compliance with this objective.</p>
<p>Objective 2: To provide appropriate legibility</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability. 	<p>The proposed development will provide a strong frontage to the western boundary along Swords Road which help create a sense of enclosure and place for pedestrians walking along this road.</p>
<p>Objective 3: To provide appropriate continuity and enclosure of streets and spaces</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest. 	<p>The proposed development has been designed in line with the Whitehall Framework Plan which had connectivity and permeability at its core. There are numerous attractive and safe pedestrian routes through the site and vehicular access is limited ensuring the space is not dominated by cars.</p> <p>The routes through the site will all be overlooked by the proposed apartment blocks. This will ensure adequate passive surveillance is provided to the public realm.</p> <p>The heights and streets provide an appropriate street width to building height ratio at a human scale.</p>
<p>Objective 4: To provide well connected, high quality and active public and communal spaces</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, 	<p>The proposed development will provide a high-quality design that will integrate into and enhance the site. The design prioritises pedestrians, cyclists and public transport with</p>

<ul style="list-style-type: none"> • be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards, • ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, • ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, • ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, • provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability. 	<p>a reduced car parking ratio provided primarily out of sight at semi-basement level.</p> <p>The blocks have been carefully located to ensure appropriate distance is provided between the proposal and the existing adjacent properties.</p> <p>The daylight sunlight assessment demonstrates that the proposed units and open spaces all achieve appropriate levels of daylight.</p> <p>The spaces and streets have all been designed to be people friendly and accessible.</p>
<p>Objective 5: To provide high quality, attractive and useable private spaces</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • not compromise the provision of high quality private outdoor space, • ensure that private space is usable, safe, accessible and inviting, • ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, • assess the microclimatic effects to mitigate and avoid negative impacts, • retain reasonable levels of overlooking and privacy in residential and mixed use development. 	<p>There is a high quality of public, communal and private open spaces provided. All of these spaces are safe, accessible, and inviting.</p> <p>The daylight sunlight assessment demonstrates that the proposed units and open spaces all achieve appropriate levels of daylight.</p> <p>The flat, low-lying nature of the existing site, and the height and orientation of the proposed blocks (when considered the extent of permitted block) indicates that the development is unlikely to create negative local wind microclimate impacts.</p> <p>The proposal has been designed to ensure passive surveillance is provided to the public spaces while also ensuring a high level of privacy is maintained for the proposed units.</p>
<p>Objective 6: To promote mix of use and diversity of activities</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure, • contribute positively to the formation of a 'sustainable urban neighbourhood', • include a mix of building and dwelling typologies in the neighbourhood, 	<p>The location has access to high quality public transport including excellent high frequency bus services. It is within walking distance of a number of significant employment centres include DCU and Beaumont Hospital. It has excellent potential to promote sustainable mobility and achieve the vision of 'walkable' communities.</p> <p>The proposed development will benefit from its location close to significant social</p>

<ul style="list-style-type: none"> • provide for residential development, with a range of housing typologies suited to different stages of the life cycle. 	<p>infrastructure and employment opportunities within walking/cycling distance or accessible by public transport. It will also add to the facilities in the area by providing a significant new public park, a café, and creche facility. The additional population created will also drive demand for additional services.</p> <p>The proposed mix of one, two and three bed apartments units will improve the housing supply quality in the area and provide different options for people in an area.</p>
<p>Objective 7: To ensure high quality and environmentally sustainable buildings Enhanced density and scale should:</p> <ul style="list-style-type: none"> • be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16, • not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, • ensure a degree of physical building adaptability as well as internal flexibility in design and layout, • ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, • maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage, • be constructed of the highest quality materials and robust construction methodologies, • incorporate appropriate sustainable technologies, be energy efficient and climate resilient, • apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16), • incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based S UDS solutions are in place – see Appendix 13, • include a flood risk assessment - see SFRA Volume 7. • include an assessment of embodied energy impacts – see Section 15.7.1 	<p>The Architectural drawings and schedules, the Architectural Design Statement and the reports provided by other Design Team consultants cover aspects of the design such as sunlight and daylight, overshadowing, plant, dual aspect, building materials, energy efficiency, use of sustainable technologies, surface water management, flood risk and assessment of embodied energy impacts.</p>
<p>Objective 8: To secure sustainable density, intensity at locations of high accessibility</p>	<p>The site is located along the Swords Quality Bus Corridor which is served by numerous</p>

<p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport, • look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design. 	<p>high-frequency bus services connecting the site with Dublin City Centre, Balbriggan, Swords, and Dublin Airport.</p> <p>The layout has been designed to provide the optimum layout for access and parking while providing a high-quality scheme that prioritises pedestrians and creates a human scaled place.</p>
<p>Objective 9: To protect historic environments from insensitive development</p> <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> • not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below. • be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed, • assess potential impacts on key views and vistas related to the historic environment. 	<p>The site is not located within an Architectural Conservation Area and is not located in close proximity to a Protected Structure or National Monument.</p> <p>As shown in the Architects Design Statement and the photomontages, the site and its surrounding environment has the capacity to absorb the proposed development.</p>
<p>Objective 10: To ensure appropriate management and maintenance</p> <p>Enhanced density and scale should</p> <ul style="list-style-type: none"> • Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc 	<p>A Building Life Cycle Report is provided that sets out the management strategy for the scheme post construction in order to demonstrate how once operational, the mechanics of the property management and public realm maintenance will work in practice and be maintained to the highest standards.</p>

Appendix 5 Transport and Mobility: Technical Requirements	
<p>The layout for all developments shall seek to maximise pedestrian permeability within the development and to improve pedestrian and cycle linkages to the wider road network, as far as possible.</p>	<p>The proposal has been designed to ensure pedestrian permeability within the site.</p> <p>The development is properly integrated into the existing footpath network. As noted in Mobility Management Plan, the proposed developments primary accesses are at the northwest and southwest corners of the site boundary. Both accesses are from the adjacent Swords Road and link the development to preexisting pedestrian networks. The northwest access will form part of a signalised junction and is shared use (vehicular, pedestrian, cyclist). The southwest access is a pedestrian/cyclist only access route and connects to the pre-existing footpaths on the Swords Road.</p>

	Once the site has been accessed, there are a large number of pedestrian routes throughout the site creating links between the five apartment blocks and the wider road network.
A walkability and/or cyclability audit may be required depending on the location of the development and existing provisions within the local road network.	Please see the Road Safety Audit prepared by ORS consulting engineers.
All developments, from one-off housing to large scale mixed use development, shall demonstrate safe vehicular access and egress arrangements.	Please see the auto track analysis prepared by PUNCH Consulting Engineers.
All vehicular access shall be considered, including private car, service, delivery and emergency vehicles, in addition to applicable vehicular access requirements.	
Where possible, service areas shall be provided within the curtilage of the site to minimise the impact on the local road network.	All routes are 1.8m wide or in excess of this. The active travel facility is 4m wide and the fire tender route is a minimum of 3.7m wide with a wider allowance to facilitate the necessary turning. Refer to Park Hood Drawings for illustration.
All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS.	Please see the DMURS Compliance Statement prepared by PUNCH Consulting Engineers.
Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.	Please see the Road Safety Audit prepared by ORS Consulting Engineers.
Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/ reduced provision of car parking to serve a development.	A Mobility Management Plan is submitted which demonstrates the proposed management strategy for the site, the alternative modes of transport and measures to promote a modal shift to more sustainable modes of transport.
The servicing requirements for any development should be established early in the preplanning process.	Please see the TTA by PUNCH which includes details regarding Service and Delivery Trips.
Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site	The application also includes appropriate autotrack assessment for the site for a variety of different vehicles.

For residential developments, details of access for service vehicles shall be considered at an early stage in the design process.	
Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated.	
Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process.	Please see the Service and Delivery Trips section within the TTA and auto track analysis drawings submitted with the application.
For larger developments (residential and non-residential), a Delivery and Service Management Plan shall contain, but is not limited to, the following information: <ul style="list-style-type: none"> • Details how the proposed development will be accessed and served by deliveries, including refuse vehicles and emergency vehicles; • Confirm the number, type and frequency of service vehicles envisaged for the development and detail the locations from which servicing will occur and how it will be managed; • Swept-path analysis demonstrating the safe manoeuvrability of all vehicles servicing the site. 	
Where a development is located in close proximity to a Luas line, consideration to the impact of deliveries and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined.	
Where car parking is provided for residential or non-residential developments, a Car Parking Management Plan shall be provided regarding the continual management and assignment of spaces to uses and residents over time	The site is not immediately adjacent to a luas line.
Generally car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements.	The amendment application includes a Car and Cycle Management Report by CWOB which has been developed in conjunction with PUNCH Consulting Engineers. A Mobility Management Plan is also submitted with this application.
A management scheme for any visitor car parking shall also put in place.	Car parking will not be sold with unit but will be assigned and managed separately
Where car club spaces are provided within a development, a letter of confirmation from the relevant provider shall be included with an application and details submitted regarding the operation of the service within a development.	Visitors will be discouraged from arriving by car.
The maximum standards for car parking provision are set out in Table 2.	A letter from the car share was submitted with the parent permission
	The replacement of the basement with a semi-basement and the resulting reduction in parking have been addressed in detail by Punch Consulting Engineers and submitted with this application. The proposal includes 163 residential parking spaces for Blocks A-E.

	<p>The wider Hartfield Place development, including Blocks F & G, offers 217 residential parking spaces for Blocks A-F, which consist of 472 residential units, resulting in a parking ratio of 0.40 spaces per unit. Additionally, 12 parking spaces will be reserved for car club use, and 11 spaces (5% of the total 212 spaces) will be designated for disabled users. For more detailed information, refer to Chapter 12 of the Punch Consulting Engineers Memorandum on Car Parking Proposals.</p>
<p>Where car parking is provided for a residential development, a rationale for the quantum of car parking proposed shall be provided. This should include an analysis of census data in relation to the car ownership levels by occupiers of a similar development (i.e. houses or apartments) in the relevant electoral area and existing mode split. Reference shall also be included to the quantum of parking in the immediate area as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed).</p>	<p>Please see the TTA by PUNCH which sets out the census data, modal split and also reflects the provision of GoCar spaces and excellent public transport infrastructure within 10 minutes' walk of the site.</p>
<p>Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential and commercial developments with zero or reduced car parking provision is not conducive to fully accessible bicycle parking and is discouraged by Dublin City Council.</p>	<p>The bicycle stores are fully and easily accessible. The Architect's Design Rationale includes details on the location and accessibility of the bike stores.</p> <p>All the bikes stores and spaces are provided at ground level and in the basement. As well as a shared ramp, there is lift access for bikes to the basement.</p>
<p>Where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively numbered/labelled for ease of use. The management of bicycle parking should also detail how access to stores for cargo bikes and adapted bikes will be facilitated.</p>	<p>There are 829 no. bike spaces including cargo bike spaces provided within blocks A to E and 925 no. bike spaces throughout the development. They are in a variety of locations easily accessible to each apartment block and each of which are accessible through a separate door. This creates a natural and logical segregation of the bicycle storage.</p>

All new developments are required to fully integrate cycle facilities into the design and operation of the schemes, in accordance with Table 1.	The level of provision is excess of the Dublin City Council Development Plan requirements.
Cycle parking for residential apartment units shall be provided at a rate of 1 secure cycle parking space per residential bedroom and 1 visitor cycle parking space for every two units. Relaxations of this standard may be considered in certain instances where the applicant can justify the proposed quantum having regard to location, quality of facilities, flexibility for future enhancement / enlargement and availability of alternative transport facilities.	
Secure bicycle parking stands shall be provided in all cases where bicycle parking is deemed to be necessary by the Planning Authority. Such cycle stands shall be within 25 m of a destination for short-term parking (shops) and within 50 m for long-term parking (school, college, office). All long-term (more than three hours) cycle stands shall be protected from the weather. Cyclists shall be able to secure both frame and wheels to the cycle parking stand.	The cycle parking is provided at surface and semi basement level. They are located within a short distance from the entrances to the apartment blocks in secure shelters.
All on-street cycle stands shall be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism	The on-street short term bike parking are also provided and are designed to meet their basic function of preventing theft of vandalism.
Off-street storage/parking facilities shall provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision	The secure long term bike parking spaces will be easily accessible and will be lit appropriately to ensure a strong sense of safety and security.
Where high density cycle parking is provided in a secure location, stacked/tiered cycle parking may be acceptable provided it is easily used and secure.	The bike store includes double-stacked bike parking which will be easily accessible.
Planning applications shall clearly demonstrate cycle parking capacity and user accessibility	Bike parking details are clearly outlined in the architects and landscape architects drawings.
A departure from the standards set out in Table 1 may be acceptable in limited circumstances on a case by case basis at the discretion of Dublin City Council. The applicant must fully engage with Dublin City Council at pre-application stage to ascertain any deviations from the above standards	The proposal exceeds the standards set out in the Table 1.
Table 2 specifies the requisite level of on-site parking to be provided for residents, staff and visitors for various types of development. These car parking standards shall be generally regarded as the maximum parking provision	The subject site is located in parking zone 2. The replacement of the basement with a semi-basement and the resulting reduction in parking have been addressed in detail by Punch Consulting Engineers and submitted with this application. The proposal includes 163 residential parking spaces for Blocks A-E.
A relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location	The wider Hartfield Place development, including Blocks F & G, offers 217 residential parking spaces for Blocks A-F, which consist of 472 residential units, resulting in a parking

	<p>ratio of 0.40 spaces per unit. Additionally, 12 parking spaces will be reserved for car club use, and 11 spaces (5% of the total 212 spaces) will be designated for disabled users. For more detailed information, refer to Chapter 12 of the Punch Consulting Engineers Memorandum on Car Parking Proposals.</p> <p>This car parking provision is considered appropriate for this highly accessible location.</p>
<p>Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on the following criteria:</p> <ul style="list-style-type: none"> • Locational suitability and advantages of the site. • Proximity to High Frequency Public Transport services (10 minutes' walk). • Walking and cycling accessibility/permeability and any improvement to same. • The range of services and sources of employment available within walking distance of the development. • Availability of shared mobility. • Impact on the amenities of surrounding properties or areas including overspill parking. • Impact on traffic safety including obstruction of other road users. • Robustness of Mobility Management Plan to support the development. 	<p>The site is highly accessible and is well served by public transport as it adjoins the Swords Road QBC and proposed Bus Connects spine route. The NTA map below shows the variety of bus services available in the vicinity providing access to the city centre, Dublin Airport, and local centres including Santry, Beaumont and DCU.</p> <p>The Swords Road interface is to facilitate the Bus connects Spine Route A and cycle lane at this location. The A Route will have services running past the site from Dublin Airport, Swords and Beaumont through the City Centre to Dundrum, Tallaght, Nutgrove and Ballycullen with 10 min frequency.</p> <p>The site is well connected to excellent public transport services. Dublin Bus Stops 237, 7851, 214 and 204 are all within c. 100m of the subject site. Bus routes which serve this area are 1, 15, 16, 16D, 33, 41, 41B, 41C, 41D, 16 and N4. These existing bus routes connect the area to Sandymount, Monkstown, Charlestown, Sandyford Business District, Dundrum, Dublin Airport, Dublin City Centre and Enniskerry.</p>
At least 5% car parking spaces shall be designated accessible car parking spaces.	5% of the car parking spaces provided have been designed as accessible car parking spaces.
Proposals should indicate how the design aims to control surface water runoff in a sustainable fashion through the use of permeable or porous surfaces such as gravel and green areas etc. rather than excessive hard surfacing	The proposal incorporates SUDs features including green roofs and permeable paving.
In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to	All of the car spaces have access to EV charging.

accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications	
New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided. Motorcycle parking areas shall have limited gradients to enable easy manoeuvrability and parking. Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device.	The proposal includes 12 no. motorcycle spaces within the scheme.
All car club spaces shall be fully equipped with EV infrastructure	The car club spaces are fully equipped with EV infrastructure.
All roads and footpaths within developments shall be constructed to Taking-in-Charge standards	All roads and footpaths will be constructed to taking-in-charge standards.
Planning applications comprising of areas to be taken in charge shall be accompanied by a taken in charge site layout plan at a scale of 1:500 which indicates the area of the site sought to be taken in charge. The details and specification of the road and footpath layout of these areas should be set out as part of the planning application	None of the site is proposed to be taken in charge.

Appendix 7 Waste Storage

Waste storage issues should be considered at the initial design and pre planning stage of all residential developments to ensure access for all (including people with disabilities), in a brightly lit, safe and well-signed area, spacious enough for easy manoeuvrability, with good ventilation and ready access if required for the control of potential vermin.	Dedicated bin stores are provided at surface level and semi-basement level, in proximity to the access road and to each apartment block. The Bin Stores are appropriately designed and easily accessible for pick up. They are designed to have good ventilation and ready access.
Provision shall also be made for the storage and collection of waste materials in apartment schemes in accordance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018.	An Operational Waste and Recycling Management Plan has been prepared by AWN.
<p>Requirements for residential developments:</p> <ul style="list-style-type: none"> • Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of non-reusable receptacles such as bags, ideally of 1,100 litre capacity, must be used • To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general waste, dry recyclables and organic food/garden waste. • Sufficient space must be provided to accommodate the collection of dry recyclables and organic kitchen waste/ garden waste. 	Please see the detail in the Operational Waste and Recycling Management Plan prepared by AWN.

- Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes.

Appendix 9 Basement Development Guidelines

The BIA will be specific to the site and the proposed development and should be undertaken by a person(s) with the appropriate qualifications and experience (Chartered Structural and/or Geotechnical Engineer or equivalent).

Please refer to the Basement Impact Assessment prepared by AGL Consulting.

Basement Impact Assessment – Submission Checklist

	Item	Yes/No
1	Description of proposed development.	
2	Plan showing boundary of development including any land required temporarily during construction.	
3	Plan, maps and photographs to show the location of basement relative to surrounding structures.	
4	Plans, maps and or photographs to show topography of surrounding area with any nearby watercourses/waterbodies including consideration of the relevant maps on the SFRA (Vol 7).	
5	Plans and sections to show foundation details of adjacent structures (reference to pre-condition reports).	
6	Plans and sections to show layout and dimensions of proposed basement and all proposed foundation details.	
7	Modelling evaluation of baseline groundwater levels and flows.	
8	Modelling and evaluation of groundwater levels and flows during construction and following construction of basement.	
9	Programme of enabling works and construction and restoration.	
10	Identification of potential risks to land stability (including surrounding structures and infrastructure and groundwater flooding.	
11	Assessment of potential risks on neighbouring properties and surface groundwater.	
12	Identification of significant adverse impacts.	
13	Ground Investigation Report and Conceptual Site Model including: <ul style="list-style-type: none"> ▪ Desktop study ▪ Exploratory hole record ▪ Results from monitoring the local groundwater regime ▪ Confirmation of baseline conditions ▪ Factual site investigation report 	
14	Ground Movement Assessment.	
15	Plans, drawings, reports to show extent of affected area.	
16	Construction Sequence Methodology (CSM) referring to site investigation and containing basement, floor and roof plan, sections, sequence of construction and temporary works.	
17	Proposals for monitoring during and post construction (groundwater movement and levels, ground movement, vibration with comparisons to baseline) – limits to be advised in BIA and monitored. Any breaches should be reported to DCC's Environment and Transportation Department.	
18	Consideration of potential impacts to protected structures, conservation areas and archaeology where relevant.	
19	Consideration of potential impacts to biodiversity and amenity.	
20	Construction Management Plan.	
21	Impact assessment and specific mitigation measures to reduce or offset significant adverse impacts with comparisons to baseline study.	
22	Provision for monitoring post construction (post-condition surveys, groundwater levels/flows etc.).	
23	Non-technical summary of full report.	

Please refer to the Basement Impact Assessment prepared by AGL Consulting.

Appendix 11 Green and Blue Roof Guide

All development types are considered appropriate for green blue roof application

The proposed development includes green roofs.

Planning applications which include roof areas of greater than 100 sq. m. with flat and gently sloped roofs are considered appropriate for green blue roof application	Please see Engineering Report prepared by JOR which sets out the type of roof, its coverage and the rationale behind the provision of each type.					
The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.						
<table border="1"> <thead> <tr> <th>Type</th><th>Minimum Coverage (% of total roof area being developed)</th></tr> </thead> <tbody> <tr> <td>Extensive</td><td>70%</td></tr> <tr> <td>Intensive</td><td>50%</td></tr> </tbody> </table>		Type	Minimum Coverage (% of total roof area being developed)	Extensive	70%	Intensive
Type	Minimum Coverage (% of total roof area being developed)					
Extensive	70%					
Intensive	50%					
The design of the green blue roof should maximise biodiversity and/ or amenity benefits.	The green roofs will support planting which will increase biodiversity on the site.					
Green blue roof designs should be designed to ensure that any amenity use (e.g. use as communal open space) can be facilitated without effecting storage capacity or drainage function of the green blue roof						

Appendix 12 SUDs	
SuDS designs will explore opportunities for: sustainable reuse of rainfall (see policy SI6); recharge of aquifers; interception and evapotranspiration of surface water; and, direct discharge to open channel watercourses, thus reducing the pressure on the piped drainage network.	<p>As per the granted SHD application, the proposed application is designed in accordance with the principles of Sustainable Urban Systems (SUDS) and in compliance with the principles outlined in the Greater Dublin Strategic Drainage Study Regional Drainage Policies Volume 2 for new developments. The implemented SUDS features where possible include:</p> <ul style="list-style-type: none"> • Green Roofs • Podium Green Areas over semi basement carpark. Permeable Paving parking spaces & footpaths • Filter drains/ infiltration strips alongside impermeable surfaces where applicable • Tree pits where applicable. <p>The incorporation of the above SUDS elements will provide a sustainable manner in which to disperse the surface water from the proposed development and will encourage groundwater recharge and provide treatment of runoff and subsequent improvement of discharge quality.</p>
SuDS structures should be integrated into the fabric of a development using the available landscape spaces as well as the construction profile of buildings. Consideration of existing site topography, landscape resources and how the site is used is vital in determining the most appropriate SuDS measures in a scheme	
Areas that store surface water during regular rainfall events, except ponds or wetlands, shall not normally be included in the calculation of open space provision.	
However, where SuDS proposals enhance biodiversity and amenity value and would be readily available for use in most weather conditions, a portion of the SuDS area could be incorporated as part of the communal or public open space provision	
The proportion of SuDS which would be allowable as part the public open space allocation would be decided on a case-by-case basis by the planning authority. The following points will be considered in determining the areal extent of SuDS which serve as multifunctional space and/ or contribute to the public open space allocation:	

- That sufficient open space remains available (except in response to extreme rainfall events) to allow for passive and active recreation including organised sport, informal play or active recreational use.
- How often a particular feature would hold surface water.
- The duration that feature would hold surface water.
- Period between rainfall ending and the area being available for use.
- Whether the SuDS features could be deemed to be providing an open space benefit even when holding surface water (for example, ponds and wetlands).

The following methods of utilising or releasing rainfall run-off from development are set out in order of preference:

- Use surface water run-off as a resource.
- Provide interception of rainfall through the use of nature based SuDS approaches.
- Where appropriate, infiltrate run-off into the ground.
- Discharge to an open surface water drainage system.
- Discharge to a piped surface water drainage system.
- Discharge to a combined sewer.

Discharging run-off from a site may utilise one or more means of discharge. Full advantage should be taken of each method of discharge on the list in turn, prior to considering the next sequential option.

Surface run-off from new development will be restricted to 2 l/s/ha for the 1 in 100 year rainfall event (with allowance for climate change and urban creep⁶¹) where surface water leaving the site:

- poses a pollution risk to the environment arising from (overflow from a combined sewer to a receiving watercourse);
- has the potential to impact upon property or infrastructure (where property or infrastructure is identified as being at flood risk from a 1 in 100 year flood / rainfall event).

The SuDS design will demonstrate that water is suitably cleansed prior to entry to SuDS components that are intended for amenity use and biodiversity benefit. Preference should be given to SuDS techniques which generate interception losses.

Designs should seek to generate amenity benefits using SuDS, through the creation of multi-functional places and landscapes.

The decreased podium deck reduces the attenuation volume required and promotes improved groundwater recharge compared to the granted SHD application. As a result of the proposed reduced size of the basement, the stormwater network has been modified to suit.

Please refer to the Surface Water layout drawing (L24-01-LRD-020) and SuDs features layout drawing (L24-01-LRD-021) prepared by JOR.

Please refer to Engineering Report and drawings prepared by JOR Consulting Engineers for full details.

Designs should seek to generate biodiversity benefits using SuDS.

Appendix 13 Surface Water Management

Dublin City Council (DCC) will require a softer engineered or nature based approach to be used to manage surface water at source as it is a greener, more environmentally effective approach for managing surface water on development lands

The proposal incorporates SuDS features including Green Roofs, Rain gardens/Podium Green Areas over basement carpark, Landscaped Areas/green gardens, Permeable Paving parking spaces & footpaths, Filter drains/Infiltration strips alongside impermeable surfaces where applicable. Please refer to Engineering Report and drawings prepared by JOR Consulting Engineers for full details.

Development proposals must be accompanied by a Surface Water Management Plan (SWMP) which sets out the proposed strategy for managing surface water.

The Surface Water Management Plan is included within the Engineering Report and drawings prepared by JOR Consulting Engineers which demonstrate how the proposed surface water management strategy is in line with the development plan and DCC guidelines.

The objective of producing a SWMP is for the developer/ project proposer to consider all the opportunities and constraints in developing a design solution that will manage surface water in a way that utilises and mimics natural processes, whilst protecting and enhancing the built and natural environment.

The SWMP prepared for submission to the planning authority as part of a planning application shall include the following:

- Site location map with proposed planning boundary indicated in red
- Overall surface water drainage layout indicating:
 - Existing public surface water infrastructure
 - Proposed connection points to existing public sewers
 - Spine sewers (if any)
 - Detail of any surface water sewer extension, diversions, surface water sewer upgrades etc. to be clearly indicated
- Report detailing existing site conditions including:
 - Topography
 - Ground conditions
 - Land drain features
 - Overland flow paths
 - Floodplains
 - Utilities
- Detail of proposed surface water management strategy shall include:

The drawings and reports prepared by JOR Consulting Engineers provide all this detail required for the Surface Water Management Plan.

- Longitudinal section details of proposed surface water pipe runs if required indicating route, levels, pipe size, gradient etc. A well designed SuDS scheme will reduce or even eliminate the need for significant piped drainage
- Identify proposed location to discharge to stream or public drainage system
- Identification of appropriate SuDS features to meet the key criteria of the GDSDS and reference in Section 16.3 of the Greater Dublin Regional Code of Practice for Drainage Works - source control and interception storage provided and volumes defined – no run-off from site for events up to 5mm. See also the Council's Sustainable Drainage Design and Evaluation Guide (2021) and Appendix 12
- Provide a clear explanation of the SuDS proposals proposed for each hardstanding area including defined control structures and sizes of same
- Discharge rate applied
- Attenuation storage provided and volumes defined – storage for 1% and 3.3% annual probability with factor in accordance with the SFRA for climate change shall be applied. A figure of 20% will be applicable in most cases
- Exceedance and overland flow routes
- Phased development – where development under a planning application/permission is phased, coordination of the overall surface water management strategy shall be implemented at the first phase in order to ensure the overall integrated design is implemented. This would allow different parts of a site to be developed at different times, while ensuring that the final developed site shall meet the overall design criteria as set out in this Appendix
- Identify green space and public space locations including any that are designed to be multifunctional – integrating SuDS (see also Section 15.6 – Green Infrastructure and Landscaping)
- Details of any proposed wayleaves or land transfers in relation to surface water drainage.
- An undertaking that SuDS will be completed to taking in charge standards (in accordance with policy SI26)

Appendix 16 Sunlight and Daylight	
<p>Performance of Proposed Development</p> <ul style="list-style-type: none"> • Annual Probable Sunlight Hours on all relevant windows • Winter Sunlight Hours on all relevant windows • Sunlight on Ground in all amenity spaces • Average Daylight Factor in all habitable rooms • No Sky Line in all habitable rooms • Target Illuminance in all habitable rooms 	<p>Please refer to the IN2 report 'Daylight and Sunlight Analysis' which has been submitted as part of this planning application.</p>
<p>Impact on Surrounding Properties</p> <ul style="list-style-type: none"> • Vertical Sky Component on all relevant surrounding windows • Annual Probable Sunlight Hours on all relevant surrounding windows • Winter Sunlight Hours on all surrounding windows • Sunlight on Ground in all surrounding amenity spaces 	<p>Section 4 of the report outlines the results of the assessed amenity spaces of the proposed amendment in accordance with the BRE Guide. The proposed amenity space was predicted to receive excellent overall sunlight availability, as 94% and 90% of the amenity space were determined to receive at least 2 hours of sunlight on 21st March, which is well above the recommended 50%.</p>
<p>When assessing the impact of a proposed development, it is expected that all surrounding properties are assessed. It is not acceptable to assess only the surrounding residential properties. Residential properties should be clearly marked out and results for these presented separately</p>	<p>All proposed amendments are internal to the site, and therefore there is no change to the impact on neighbours as per the permitted scheme. The impact of the proposed amendment on neighbouring buildings is discussed in Section 5 of the report.</p>
<p>When assessing the impact of a proposed development on the existing surrounding properties, it is expected that the rule within clause 2.2.4 of BR 209 is applied. This rule outlines that "Loss of light to existing windows need not be analysed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window". Thus, all surrounding buildings that sit within three times the height of the proposed development shall be included within the assessment. The assessment can then use methods typically applied in BR 209 to determine the correct approach to investigating loss of light.</p>	<p>Section 6 of the report includes daylight analysis that has been undertaken for the kitchen/living/dining (KLD) and bedroom spaces in assessed units.</p> <p>All rooms were assessed for the Spatial Daylight Autonomy (SDA) methodology as detailed in the BRE Guide. A very high compliance rate of 99% of the rooms, were found to be compliant for BRE Guide recommendation and detailed results are presented in Appendix A. This represents a significant improvement on the permitted scheme as discussed in section 6.2.</p> <p>As per the Apartment Guidelines, in cases where rooms were determined not to comply with the BRE Guide (totalling 13 rooms), these have been identified, and compensatory measures are provided in Appendix A.</p> <p>Section 7 of the report included the results for the Exposure to Sunlight Analysis. This metric assesses the sunlight availability to each unit. A high level of compliance was</p>

	<p>achieved as 95% of units exceeding the minimum recommendations.</p> <p>In summary, this report confirms that best practices for daylight and sunlight availability have been applied to the proposed amendment to the Hartfield development compared to the parent permission (SHD ABP 313289-22), achieving a very high 99% compliance rate for internal daylight availability.</p>																								
<p>When analysing the results found to investigate the impact of a proposed development on the surrounding existing buildings, it is expected that the nomenclature and associated descriptions from within Appendix I of BR 209 are used. The wordings of negligible, minor adverse, moderate adverse and major adverse have defined meanings. These meanings have associated descriptors, and these shall be applied during the analytics section of reports. Appendix I in BR 209 provides these descriptions in full.</p>	<p>The Daylight Sunlight Assessment uses all terminology in line with the latest BRE guidance: “Building Research Establishment (BRE) guidelines on “Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 3rd Edition (Building Research Establishment Report, 2022)”.</p>																								
<p>The use of average daylight factor in assessing the impact of a new development on surrounding existing developments is not permitted.</p>		<p>Where alternate target values are being set, this shall be completed in line with Appendix F of BR 209</p>	<p>The daylight report clearly outlines what target values have been set.</p>	<p>When analysing the performance of a proposed development, it is expected that all rooms with an expectation for daylight are assessed. Assessing only a sample of rooms is not permitted.</p>	<p>All rooms within the proposed development have been assessed.</p>	<p>When determining input factors for simulations, the criteria below shall be applied, applicants shall clearly state their assumptions.</p>	<p>The assumptions are clearly stated in IN2’s report.</p>	<p>For residential developments, the internal daylight levels shall be benchmarked against the relevant targets in both BS 8206-2 and BS EN 17037. These are given below for clarity.</p> <div><p>Table 1: Internal Daylight Levels</p><table><tr><th>Room Type</th><th>BS 8206 Average Daylight Factor</th><th>BS EN 17037 Target Illuminance</th></tr><tr><td>Bedroom</td><td>1.0 %</td><td>100 lux</td></tr><tr><td>Living Room</td><td>1.5 %</td><td>150 lux</td></tr><tr><td>Kitchen</td><td>2.0 %</td><td>200 lux</td></tr><tr><td>Kitchen, Living & Dining</td><td>2.0 %</td><td>200 lux</td></tr></table></div>	Room Type	BS 8206 Average Daylight Factor	BS EN 17037 Target Illuminance	Bedroom	1.0 %	100 lux	Living Room	1.5 %	150 lux	Kitchen	2.0 %	200 lux	Kitchen, Living & Dining	2.0 %	200 lux	<p>The assessment has been carried out in line with the latest BRE Guidance as adopted.</p>	<p>When assessing target illuminance, it shall be clearly stated which of the two methodologies within BS EN 17037 has been applied. Where the climatic data approach is used, the minimum time step shall be hourly and the weather file chosen shall be stated. Assessments shall not combine both methods (e.g., where the median external sky method is used to</p>
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assess north facing rooms, this shall also be used to assess all other rooms).	
For combined kitchen, living and dining rooms, the full extent of the area within these spaces shall be included in assessments of internal daylight. Where galley type kitchens are provided, the application shall clearly set out how they were unavoidable in the design. It is expected that developments will not consist entirely of units that rely on galley type kitchens	This is noted and again, the IN2 report clearly sets out the approach used in this development.

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

Conclusion

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional, and local planning policies and guidance and will provide a high-quality living environment and services to the future occupants of this and adjacent developments.

The proposed development achieves a sustainable use of development whilst respecting the built environment around it. The principle of redeveloping the site for this use is supported by the land use zoning as well as other key policy objectives contained within the Dublin County City Development Plan 2022-2028.

This is an amendment to a permitted SHD development with Construction of Blocks F and G due to commence shortly. The layout, scale, design and massing are similar to that of the permitted scheme. All of the amendments are considered to deliver improvements over the permitted development in terms of

- Materials, and improved design of the development
- Improved landscaping as a result of the omission of the basement
- Improved environmental impacts due to reduced excavation and increased permeable area
- Encourages a modal shift to more sustainable transport through the provision of a variety of high quality cycle parking and also increased car share options.
- Improved daylight and sunlight to all the apartments.

The design of the proposed development has been carefully considered to integrate into the existing urban environment, as well as producing a building of high architectural quality and purpose. The changes proposed are subtle with no resultant impact to the overall character and appearance of the permitted development.

The materials and finishes respect those permitted, providing a distinctive identity to the development, while completing its surroundings, respecting the existing structures and features.

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

- *Ireland 2040 Our Plan - National Planning Framework (2018);*
- *Housing for All – A New Housing Plan for Ireland (2021)*
- *Delivering Homes, Sustaining Communities (2007) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;*
- *Quality Housing for Sustainable Communities (2007);*
- *Climate Action Plan (2019);*
- *Climate Action Plan (2021);*
- *Regional, Spatial and Economic Strategy 2019-2031;*
- *Transport Plan for the Greater Dublin Area 2016-2035;*
- *Transport Strategy for the Greater Dublin Area 2022-2042.*
- *Urban Development & Building Heights: Guidelines for Planning Authorities (2018)*
- *Sustainable Urban Housing: Design Standards for New Apartments (2023)*
- *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)*

- *Childcare Facilities Guidelines for Planning Authorities (2001)*
- *Urban Design Manual: A Best Practice Guide (2009)*
- *Guidelines Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2009)*
- *The Planning System and Flood Risk Management (2009)*
- *Dublin City Development Plan 2022-2028*

The proposed development addresses all the previous reasons for refusal and is fully compliant with the policies and provisions of the area including the land use zoning, density, design standards for residential schemes, streets, parking and open spaces. The proposed development will also bring significant benefits to the area, in particular the provision of new public open space, a better mix of housing types and unit sizes to the area and a new community/ cultural/ arts space.

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

We ask the Planning Authority to grant permission for development subject to conditions, as appropriate. Should you require anything further, please don't hesitate to contact our office.

Appendix A

Section 247(7) Letter



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

16/09/2024

EW Property Limited
c/o Sean Maguire,
McGill Planning,
Iconic Offices, Number 9,
9 Pembroke Street Upper,
Dublin 2 D02 KR83,
info@mcgplanning.ie

Re: Section 247 (7) – Section 247(7) Request for LRD Application for amendments to permitted development ABP 313289-22 (SHD0010/22) for apartments, creche and associated works at a site at 'Hartfield Place', Swords Road, Whitehall, Co. Dublin

**A. Meeting Minutes date 20/05/24; and
B. Determination under Section 247 (7) of the Planning & Development Act 2000-2022**

Dear Sean,

A Pre-Application Consultation Request dated 23/04/24 was received by Dublin City Council's Planning Department on behalf of EW Property Limited.

The request for consultation was regarding proposed amendments to permitted Strategic Housing Development Reg. Ref. ABP 313289-22 which was granted by An Bord Pleanála on the 16/11/2022, for the construction of 7 apartment blocks, up to a height of 8 storeys, providing 472 residential units, a crèche, a café, internal residential amenity space and associated works.

A subsequent Section 247 meeting was held between the applicant – EW Property Limited, and Dublin City Council on the 20/05/24 (as per Planning and Development Act 2000-2022).

The following references the minutes of the meeting; and a determination under Section 247 (7) of the aforementioned Act.

- A. *Minutes of the Meeting – please find a copy of the minutes enclosed.*
- B. *Determination under Section 247 (7) of the Planning & Development Act 2000 as amended*

Introduction

The Planning Authority received a request on behalf of EW Property Limited, in relation to proposed amendments to a permitted development Reg. Ref. ABP 313289-22 granted under the Planning and Development (Housing) and Residential Tenancies Act 2016 as amended.

Ceannoflíg, Oifigí na Cathrach, An Ché Adhmaid, Bhaile Átha Cliath 8, Éire
Head Office, Civic Offices, Wood Quay, Dublin 8, Ireland



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Permitted and Proposed Development

The permitted development was for:

The construction of 7 no. apartment blocks, ranging in height up to 8 storeys (over single level basement). This will provide 472 no. residential units (comprising 32 no. studios, 198 no. 1 beds, 233 no. 2 beds, and 9 no. 3 beds). All with associated private balconies/terraces to the north/south/east/west elevations. A creche (c.445.76sqm), a café unit (c.99sqm), and internal residential amenity space (c.511sqm), providing a sun lounge, gym, screening room, lounge, and meeting rooms, will also be provided.

The proposed development will include 337 no. car parking spaces, 982 no. cycle parking spaces, and 14 no. motorcycle spaces at basement/surface levels, public open space, and communal open spaces at ground and roof levels.

Vehicular access from Swords Road will be provided with associated works/upgrades to the existing public road layout, junctions, bus lane and footpath network to facilitate same. Two pedestrian/ cyclist only access are provided from the Swords Road as well as a separate pedestrian and cyclist access to the southwest which also facilitates emergency vehicular access.

The application will include for all development works, landscaping, ESB substations, plant areas, bin storage, surface water attenuation, and site services required to facilitate the proposed development. Upgrades to the Irish Water network to facilitate the development are also proposed.

The current proposal relates to:

Proposed amendments to the permitted scheme which will comprise the replacement of the permitted basement with a semi-basement under blocks D and E only. This will result in an increase in height of blocks D and E, with minor increase to block B height, alteration to and reduction of the number of car parking spaces on site, alteration to the cycle parking locations, and changes to the open space layout. Amendments to the internal layout of Blocks A,B,C,D,& E resulting in the increase in the total number of units by 29 units, with an overall total of 334 units.

Determination

The Planning Authority has compared the proposed development to the permitted development, and considered whether the —

- (a) the proposed development is substantially the same as the permitted development, and
- (b) the nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.

The Planning Authority has determined that **no further consultation is required** under Section 247 in relation to the proposed development.

This determination is based on plans and particulars received by the Planning Authority on the 20/05/24, the 07/06/24, the 03/07/24 and the 31/07/24.

In accordance with Section 247(8) of the Act, a determination under subsection 247 (7) shall not prejudice the performance by the Planning Authority of its functions under this Act or any regulations under the Planning and Development Act 2000-2022 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

Yours sincerely,
Billy Joe Padden
Senior Planner
North West, North Central Areas
Dublin City Council