

Proposed Part 8 Residential Development  
Kishoge, Lucan

**Planning Statement**

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South Dublin County Council

May 2024



**HRA | PLANNING**  
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## **1.0 INTRODUCTION**

### **1.1 Legislative Background**

The Social Housing Public Private Partnership (PPP) Programme represents one of the many strands of delivery to increase the quantity of social housing and is supported as a delivery mechanism in 'Housing for All'. The success of this model for social housing delivery is evident as it has already provided 1,000 high-quality new homes, with another 3,500 in the pipeline. The proposed development is part of the fifth bundle of sites to be developed under this programme.

Part XI of the Planning and Development Act 2000 as amended and the procedures set out in Part 8 of the Planning and Development Regulations 2001 as amended, relate to development by, on behalf of, or in partnership, with the Local Authority. Under Section 179 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out prescribed development or a class of development, subject to compliance with the provisions of that section.

The development is being advanced in accordance with the Clonburris Strategic Development Zone Planning Scheme 2019 and relates to a proposed development within the Clonburris Strategic Development Planning Scheme Area, as defined by Statutory Instrument No. 604 of 2015. The proposed development seeks the construction of 118 no. residential units, including 89 no. apartment units and 29 no. houses in a mix of two storey houses, 3 storey duplex units and apartment blocks of 4 – 6 storeys comprising 29 no. 1 bed apartments; 39 no. 2 bed apartments; 21 no. 3 bed apartments; 23 no. 3 bed houses; and 6 no. 4 bed houses. The site will be accessed from Lynch's Lane, an existing access road off Thomas Omer Way.

### **1.2 Background to the Part 8 proposal**

The Social Housing PPP programme consists of the design, construction, financing and maintenance of approximately 3,000 homes in five project bundles of social housing developments on sites around Ireland to be delivered by Public Private Partnership (PPP). The Department of Housing, Local Government and Heritage is the approving authority for the programme with the NDFA as financial advisor, procuring authority and project manager.

The Design Team has advanced proposals on behalf of the National Development Finance Agency (NDFA) in consultation with South Dublin County Council. The units are to be delivered using an 'availability-based PPP model'. Under this model a consortium designs (in accordance with the Part 8 consent), builds, finances and maintains the social housing units on behalf of the local authority subject to a contract. The maintenance and upkeep services are provided for a period of 25 years after construction. After this the units are returned to the local authority in good, pre-defined, condition.

The sites for this project always remain in State ownership and are made available to the PPP Company by way of a license. As the model is 'availability-based', the private sector partner is responsible for ensuring that units are available for occupation. The local authority is the landlord and is responsible for nominating tenants from the local authority social housing waiting list, based on the local authority's allocation scheme. Bundle 5 includes ten sites, one of which is in the administrative area of South Dublin County Council.

### **1.3 Structure of Planning Report**

This planning report was prepared on behalf of the NDFA and South Dublin County Council to accompany a Part 8 proposal for the development of 118 no. residential units on a gross site of circa - 2.34 hectares in area, located in the townland of Kishoge, Lucan, Co. Dublin. This report is structured to provide:

- A description of the site and surrounding area, and of the proposed development.
- An outline of how the development complies with national policy, regional policy and local policy.
- An outline of the traffic and transportation consideration, drainage and water supply; and
- Provides a review of environmental matters, including ecology, environmental impact assessment and appropriate assessment.

This Statement demonstrates that the proposed development is consistent with the Planning Scheme, prepared by South Dublin County Council. It further demonstrates that the proposed development is in compliance with the relevant national, regional and local planning policy, including the South Dublin Development Plan 2022 – 2028.

## **2.0 SITE DESCRIPTION AND SURROUNDING AREA**

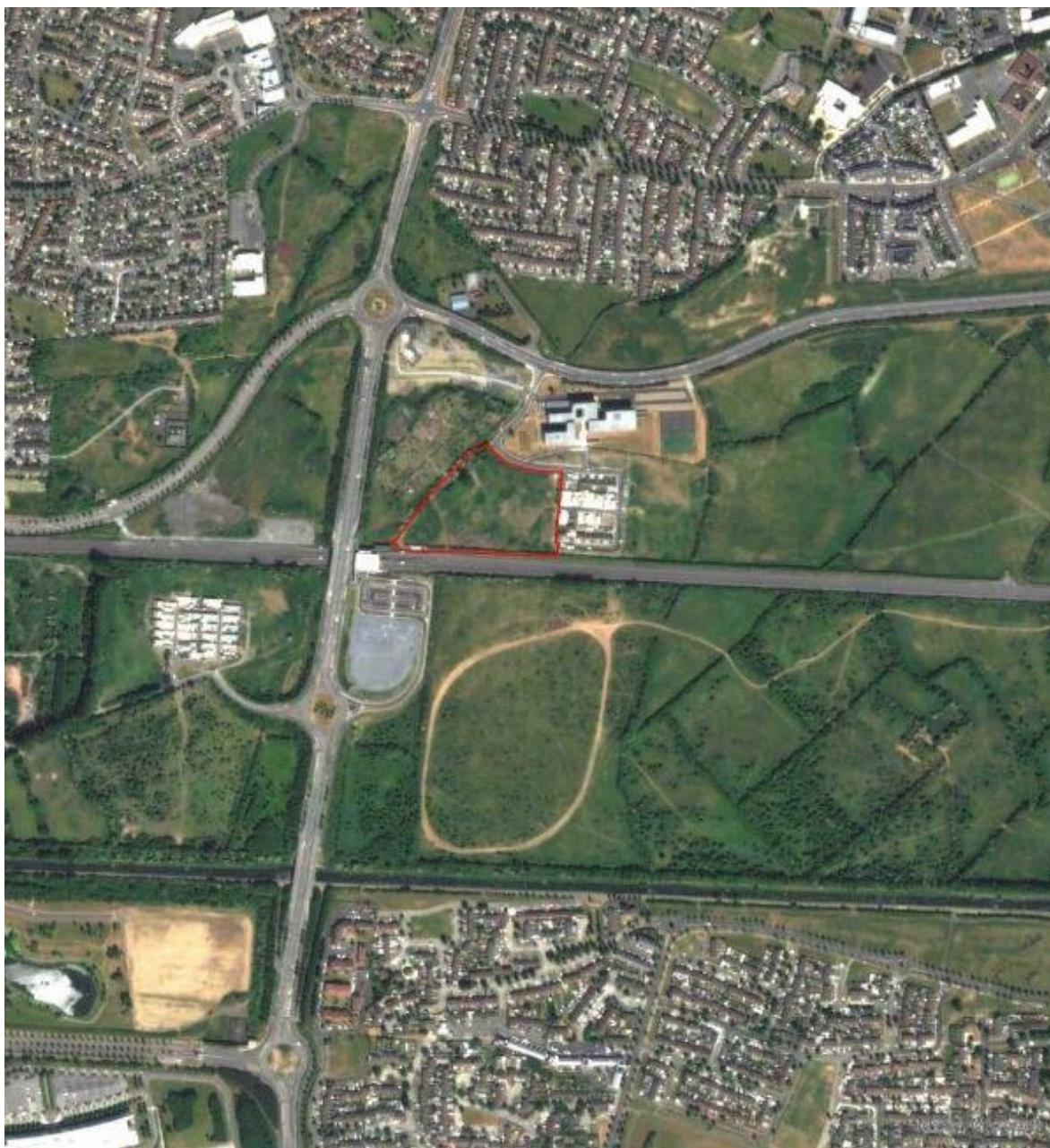
### **2.1 Location and Surroundings**

The subject site is c. 2.3 hectares and is located within the Clonburris SDZ Planning Scheme, which comprises 280 hectares of land.

Geographically, the site is located to the west of Dublin City Centre and the M50 - within the triangle between Lucan, Clondalkin and Liffey Valley. The lands are defined to the south by the Kildare railway line with the Grand Canal further south, situated circa 460m from the site. The Kishoge Rail Station, not operational to date, is located on the southern side of the rail line, at the south west corner of the subject site. The Clondalkin-Fonthill station, located 1km east of the site is operational. There are two strategic roads in proximity to the site including the Grange Castle Road (also referred to as the Outer Ring Road) to the west and the Fonthill Road further to the east.

The lands at Clonburris are currently characterised by transitional agricultural landscapes. Despite its location and context between the established communities of Lucan and Clondalkin, the lands are only now being developed, although they still retain a largely rural character. In recent years, a primary and secondary school have been constructed north east of the site, along with traveller accommodation which neighbours the site to the east. The permitted Clonburris Southern Link Street (SDZ20A/0021) is currently under construction, located on land south of the railway line. Planning permission was recently granted for a significant mixed use residential and commercial scheme located to the south west and separated from the subject site by the rail line (SDZ23A/0043).

The general area surrounding the site is residential in nature. The Adamstown SDZ is located southwest of the site adjoining the boundary of the wider SDZ lands. Grange Castle Business Park is located to the south west of the site with access off the Grange Castle Road, providing substantial employment opportunities in the area.



**Figure 1.0** Site Location

## 2.2 Site Description

Based on a review of aerial photography it appears that the 2.3 hectares site was formerly used as allotments / horticultural land in the 1990s and early 2000s, but in the late 2000s it was cleared and disturbed during the construction of the adjacent Lynch's Park development, the removal of a halting site to the north-west of the site, and the widening of the railway line. As part of this process, a large mound of spoil was deposited in the north-east of the site. There has been no activity on the site since approximately 2010, and it has recolonised with scrub. The only activity on the site during this period has been low-intensity grazing by horses.

The southern boundary of the site is defined by the Kildare rail line. The western boundary is defined by an existing laneway known as Lynch's lane, with brownfield land located further west comprising an old halting site, with some remaining walls and concrete surfaced yards. The eastern boundary is

formed by the Lynch's Yard residential development, and the northern boundary by an associated road, with Kishoge Community College located on the northern side of the road.

The topography of the site is broadly level. The mound of building spoil in the north-east of the site is the only topographical feature of note.

There are no identified habitats or species of ecological note within the site. The Ecological Impact Assessment prepared by NM Ecology, comprises habitats of scrub, broadleaved woodland / treeline, hedgerow, neutral grassland and recolonising bare ground. The development site is not located within or directly adjacent to any Natura 2000 site. The closest European site is the Rye Water Valley / Carton Special Area of Conservation (SAC), located circa 5.2 kilometers to the north-west.

According to the Historic Environment Viewer there are no national monuments identified in or adjoining the site. The closest protected structure, Grange House, is located over 1km from the study area towards the west end of Lynch's Lane.

### **2.3 SDZ Planning Context**

A plan led approach to development has been adopted having regard to the objectives in the South Dublin Development Plan 2022 – 2028 (SDDP), which seeks to promote compact development through the development of underutilised and brownfield sites and development objectives of the Clonburris Strategic Development Zone (SDZ) Planning Scheme.

### **2.4 Planning History**

An Bord Pleanála (ABP-301962-18) approved the Clonburris Strategic Development Zone (SDZ) Planning Scheme, with amendments in May 2019 which incorporates the subject site. There is no other planning permission relevant to the subject site.

However, as referenced in Section 2.1 the area is in a period of transition as development is being advanced in a coordinated manner. In this regard there are a number of significant and relevant planning permissions which have been granted in accordance with the provisions and objectives of the Planning Scheme.

- SDZ23A/0043 – A proposed mixed use development comprising: 495 no. residential units, 2,502 sq.m of retail floorspace, including 1 no. large 2 storey retail unit and 2no. independent retail units , 4,607sqm of employment floorspace and 2 no. independent employment units , a bike hub; 483 sq.m creche; public open space, including an urban plaza; in Area 6 Kishoge Urban Centre, sub sector KUC-S4 (including an area of Development Area, 9 Kishoge South East, sub sector KSE-S1), immediately south of the subject site. Development Areas KUC-S4 and part of KSE-S1.
- SDZ23A/0016 – Temporary 5 year permission for the construction of a logistics facility comprising a warehouse at Neillstown, Clonburris.
- SDZ23A/0004 Extension to Adamstown to include 385 no. residential units within Clonburris SDZ at Adamstown. Development Areas AE-S1 and AE-S2.
- SDZ23A/0018 – Development of 565 dwellings within the townland of Cappagh and Clonburris Little, Clonburris, Co. Dublin to the south east of the subject site. Development Areas CSW-S1 AND CSW-S2.

- SDZ22A/0017 - Construction of 157 dwellings within the Clonburris South-West Development Area, in the townland of Cappagh, south east of the site. Development Area CSW-S3.
- SDZ22A/0018 - Construction of a mixed-use development comprising 594 apartments with office floors within the townland of Cappagh, Clonburris. Development Areas CUC-S3 AND CSW-S3.
- SDZ22A/0011 – Permission granted for a primary school with 16 no. classrooms at Thomas Omer Way, Balgaddy. Development Area KNE-S3
- SDZ22A/0010 – Construction of mixed use development on 6.3 hectare site including provision of 283 no. residential units, creche and retail units in the townland of Cappagh, Dublin 22. Development Areas CSE-S1; CSE-S2 and part of CUC-S4.
- SD228/0003 – A Part 8 development of proposed social and affordable housing comprising of 263 residential units located at Kishoge South West, Lynches Lane, East of R136 Outer Ring Road and south west of the subject site.
- SD228/0001 – A Part 8 application for 118 residential units made up of houses, duplexes, triplexes, an apartment building, landscape works, total site area approx. 2.5 ha (net) at Bawnogue Road/Ashwood Drive, Clonburris, Clondalkin, Dublin 22.
- SDZ21A/0022 – Planning permission has been sought for the construction of 569 dwellings, a creche, innovation hub and open space in the Cappagh, Clonburris Little and Kishoge. Development Areas CSW-S3 and CSW-S4.
- SDZ20A/0021 – Planning permission was granted for infrastructure works which traverse the SDZ area and cross the subject site.
- SD198/0008 - Extension and alterations constructed at ground floor level to the existing Day-House to include at No. 19 Kishoge Park, Lynch's Lane
- SD17A/0187 - Permission granted for 11 No. 2-storey, infill houses with associated site works at 20, 34, 36, 38, 55, 65, 67, 69, 71, 73, 75, Tullyhall Drive. These houses were previously permitted under permission SD05A/0274EP, now lapsed. (08/08/2017)
- SD158/0008 – Part 8 approval for access road to the south of the Grand Canal in Grange Business Park.

### **3.0 SITE SELECTION & CONSIDERATION OF ALTERNATIVES**

#### **3.1 Site Selection**

The subject land is in the ownership of South Dublin County Council and therefore can be efficiently utilised to meet some of the unmet demand for social housing arising in the area. Site selection was restricted to consideration of that land in the ownership of the County Council, zoned for a development purpose and which could be adequately serviced and integrated to provide much needed social housing. The land is part of a Planning Scheme which seeks to develop and service a substantial landbank in a coordinated manner. The site is not subject to any beneficial use. The objective is to maximise the development potential of the land in the interests of sustainable development and compact growth.

Site selection has had regard to the provisions of the Dún Laoghaire-Rathdown Development Plan 2022 – 2028, which seeks to address many issues associated with housing in the county, including housing

need, improving social mix and catering for those with particular needs. Development of the subject site for residential use is consistent with, and responsive to the statutory land use and spatial development objectives for the site and for the wider area as set out in the Development Plan.

### 3.2 Consideration of Housing Tenure & Type

The provision of social housing units on this site will facilitate diversity in tenure and facilitate housing mix in the area all in accordance with H2 Objectives 6 & 7 in the Development Plan. Policy H1 Objective 12 of the Development Plan recognises that whilst it is a requirement for proposals for residential development to provide a minimum of 30 per cent 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that the scheme is a social and / or affordable housing scheme.

In examination of the delivery of 118 no. social apartment and housing units, it is pertinent to consider existing tenure types within the adjoining Electoral Divisions (ED) of Clondalkin – Cappaghmore and Lucan-Esker as detailed in Figure 2.0. The Census of Population 2022 confirmed that there were 11,180 houses in the ED's with 123 no. of these (1.1%) temporarily vacant or used as holiday homes. Of the total 10,730 households in the ED, 85.4 per cent of the total housing stock is privately owned or rented. Only 10.1 per cent comprise social housing, either rented from the local authority or a voluntary housing body. The proposed addition of 118 no. social housing units increases the total provision of social housing in the area to 11.1 per cent.

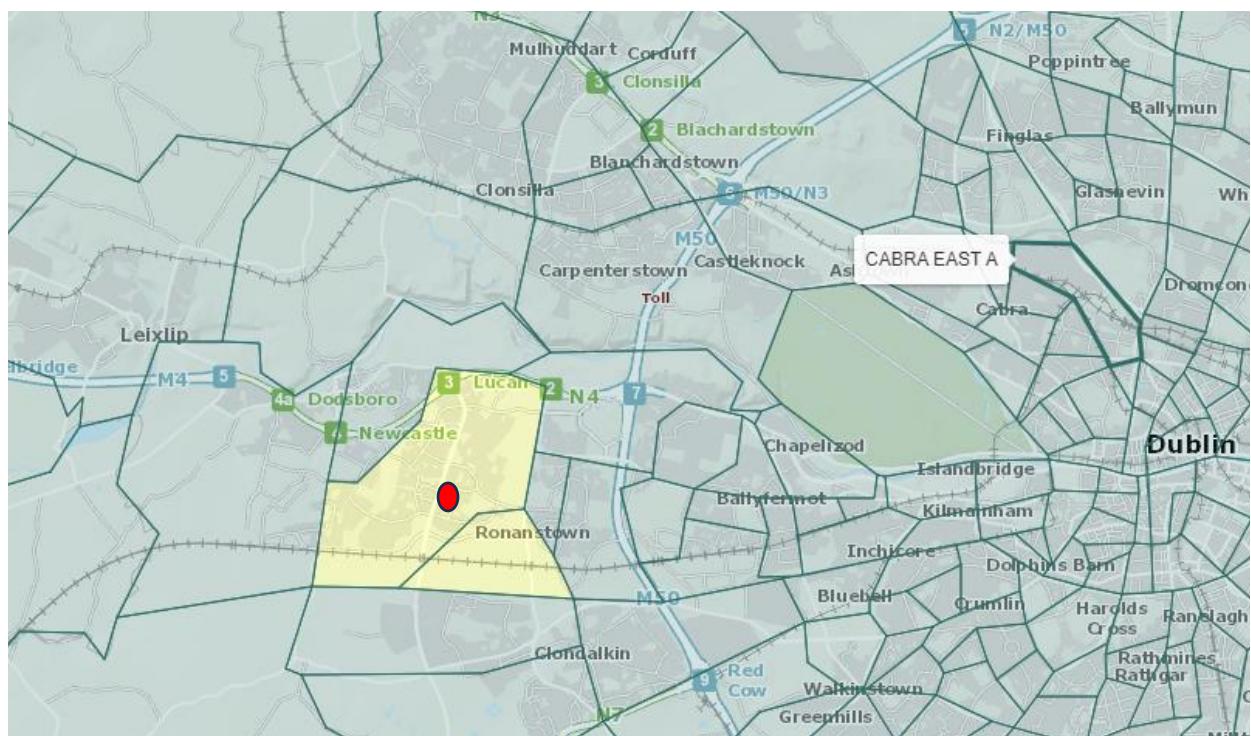


Figure 2.0 Extent of DED Catchment identified in yellow with location of site in red dot

In addition to the proposed development, a Part 8 development proposal was recently consented by South Dublin County Council but has yet to be constructed. The proposed development of social and affordable housing (SD228/0003) comprises 263 no. residential units at Kishoge South West, Lynch's Lane, East of R136 Outer Ring Road and south west of the subject site. The development comprises 90 no. social housing units, 83 no. affordable rental and 90 no. affordable purchase. The proposed development, should it be constructed, when considered cumulatively with the proposed development, shall increase the total provision of social housing in the area to 11.8 per cent.

This ratio of private to social housing mix is considered acceptable on the plausible assumption that dominance by any single tenure should not exceed 50 per cent. Accordingly, the proposed development must be considered appropriate to the area providing for balanced and integrated housing tenure.

### **3.3 Consideration of Design**

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high quality residential development, creating a sense of place for future residents, whilst integrating into the existing built environment, all in accordance with the adopted Planning Scheme for Clonburris. A number of site specific characteristics have influenced the overall design approach, including:

- Retention of the mature trees on the western boundary of the site.
- Integrated provision of SUDs and adoption of a nature based approach to provision and management.
- Enhanced permeability providing for pedestrian and bicycle connectivity between the site and neighbouring road network, cognisant of the future operating plans of Kishoge rail station and the requirement for significant green infrastructure;
- Pursuit of a balanced approach to scale and form of development cognisant of the established and prevailing character of development in the area and future anticipated development established by the Planning Scheme Framework;
- Strong streetscape onto Lynches Lane and future Clonburris Link Road to the north to be delivered by the Clonburris Infrastructure Limited, as joint infrastructure works.

### **4.0 NEED FOR DEVELOPMENT**

The South Dublin Development Plan (Chapter 5 Quality Design and Healthy Placemaking) intends to accommodate the full spectrum of current and future housing needs of all members of society throughout the county. It aims to provide clear guidance on making provision for specialised housing requirements and addressing the needs of communities, ultimately delivering sustainable residential communities across the county.

The pressing need for social housing in South Dublin is clearly articulated in Sections 7 & 8 of the South Dublin Housing Delivery Action Plan 2022 - 2026. This report confirms the social housing delivery targets for the period 2022-2026 allocated to South Dublin by the Minister for Housing, requiring a total of 3,671 new social homes comprising 3,381 new build homes and 290 leased homes. These ambitious targets not only acknowledges but also emphasises the significant demand for social housing in the area.

In the South Dublin County Development Plan Appendix 11: South Dublin Housing Strategy and Interim HNDA 2022 - 2028, the need for the development of social housing in the region is clearly outlined. Table 5.5 identifies the total social household need 2021 – 2028 at 8,415 households with a building programme required to deliver 3,104 social housing units.

The proposed development of 118 no. units on site will only accommodate 1.4 per cent of the overall social housing demand in South Dublin between 2021 - 2028 and only seeks to deliver 3.8 per cent of the target supply between 2021 – 2028.

## 5.0 PROPOSED DEVELOPMENT

### 5.1 Development Description

The project details are contained in the proposed development drawings and 'Architectural Design Statement' prepared by the project Architect (MCORM); the Engineering Report and documents prepared by the project Engineer Malone O'Regan and all other associated environmental reports.

The proposed development includes:

- i. 118 no. residential units in a mix of two storey houses, 3 storey duplex units and apartment blocks of 4 – 6 storeys comprising 26 no. 1 bed apartments; 42 no. 2 bed apartments; 21 no. 3 bed apartments; 23 no. 3 bed houses; and 6 no. 4 bed houses, with renewable energy design measures (which may be provided externally) for each housing unit;
- ii. Landscaping works including provision of (a) communal open space areas (b) outdoor sports and play areas; (c) new pedestrian and cycle connections; and (d) civic plaza;
- iii. Associated site and infrastructural works including provision for (a) ESB substations and switchrooms; (b) energy centre to the rear of 6 storey block; (c) photovoltaic panels; (d) car and bicycle parking; (e) public lighting; (f) bin storage; (g) temporary construction signage; (h) estate signage; and (i) varied site boundary treatment comprising walls and fencing; and
- iv. all associated site development works.

The proposed development satisfies current Department of Housing, Local Government and Heritage's specifications and South Dublin County Council's housing standards as expressed through the South Dublin Development Plan 2022 – 2028. The following tables set out the principal detail of the proposed development in terms of landuse, residential numbers, general sizes, tenure and typology.

The Net Development Area, for the purposes of demonstrating compliance with the development parameters for sub sectors KUC-S2 and KNE-S4, is 2.3 hectares. Importantly, this area forms the basis for the net density calculation as required by Section 2.1.5 of the Planning Scheme which states that "*residential densities shall be calculated on the basis of Net Development Area as described under Section 2.1.4*". In Section 2.1.4 of the Planning Scheme, it is further stated that for calculation purposes "*Net Development Area comprises Gross Development Area excluding strategic parklands, canal corridors, schools and existing residential development*". Given that the totality of the subject site is proposed for development and strategic parklands are to be accommodated on other sites within the Planning Scheme, in this instance the gross and net development areas are the same.

Table 1.0 Principal Figures

Tenure Type	Total No.	beds	No.	% of tenure	Unit Size (GFA) m <sup>2</sup>	Total GFA
Houses	29	3 Bed	23	19.4%	101.6sqm – 109.8sqm	10,667.78sqm
		4 Bed	6	5%	124.9sqm – 131sqm	
Apartments	47	1 Bed	5	4.2%	50.4sqm	
		2 Bed	42	35.5%	77.7sqm – 85.9sqm	
Own Door Apartment Units	42	1 Bed	21	17.7%	60sqm – 71.5sqm	
		3 Bed	21	17.7%	110.6sqm – 133.5sqm	

Table 2.0: Development Areas

Total No. of Units	118 no. units	KUC-S2 – 43 no. units KNE-S4 – 75 no. units
Gross Site Area (total site defined in red outline)	2.3 hectares	KUC-S2 – 0.64 hectares KNE-S4 – 1.67 hectares
Communal Open Space	0.1153 hectares	
Public Open Space	13.7%	
Density	50.9 d/ha	KUC-S2 – 66.5 uph KNE-S4 – 45uph
Height	4 - 6 stories	
Plot Ratio	1.94	
Site Coverage	22.43%	
Dual Aspect Provision	91% of apartments	

## 5.2 Design Approach

The architect's design statement enclosed with the planning application (in accordance with the requirements of Policy QDP8 Objective 1 in the Development Plan) reflects and states the intention of the local authority through the proposed design, to deliver a high quality residential development that responds to the existing context and site constraints and which seeks to create an integrated, permeable and sustainable residential development in the context of the Planning Framework set out in the Clonburris Planning Scheme (See Figure 3.0).

The proposed built form is arranged around a proposed network of local streets, an urban plaza, landscaped public realm and surface car parking. The design and layout adheres to best practice design principles responding to the physical constraints presented by the site and also the specific design parameters set out in the Clonburris Planning Scheme. Located within Development Area 10 Kishoge North East (KNE-S4) and Development Area 6 Kishoge Urban Centre (KUC-S2), the objective is to develop a high quality residential neighbourhood; to ensure high levels of legibility and ease of orientation; to prioritise pedestrian and cyclist movement and to provide for a range of housing whilst designing to accommodate the proposed new Link Street.



**Figure 3.0** Clonburris Planning Scheme with Site Outlined in Red

### 5.3 Site Layout and Building Height

Whilst the proposed building height within KUC-S2 comprises 3 - 6 stories with a density of 66.54uph in compliance with the promoted 2 – 8 storey building height and increased net densities of 65 – 125 in the Planning Scheme, the approach within KNE-S4 promotes a lower height of between 2 - 4 stories and a density of 45uph in accordance with the density range (45 – 55) promoted in the Planning Scheme.

Building blocks within the site are sited to provide strong building frontages close to street edges. Setbacks from the street edge are therefore minimised and on-street parking is incorporated as per requirements in Section 2.8.4 of the Planning Scheme. The architectural design of the apartment and housing units adopts a contemporary distinctive use of simple geometry, proportions and material finishes, with external balconies providing individual apartment units with private open space. Full brick facades are provided to all elevations facing internal roads and open space. The design presents an aesthetic visual and functional relationship between the residential units, the proposed Local Streets, the railway line and the proposed green link, due to the proximity of building line and boundary treatments.

The apartment block consists of two cores serving apartments accessed from a double loaded corridor, achieving 91 per cent dual aspect units. The own door apartment units accommodate 100% dual aspect provision. Building design will achieve A2 BER rating.

### 5.4 Internal Road Layout and Access

Vehicular access is provided to the development off Lynch's Lane, a proposed Local Street within the Planning Framework. There is no direct vehicular access from the development proposed to the Link Street to the north, although pedestrian and cycle access will be facilitated. The proposed internal road layout responds to the requirements of the Clonburris Planning Scheme set out in Section 2.2.7 and generally comprises 'local streets' with an 'intimate local street' (home zone located to the east of the

site, serving the two storey houses. Generally, the proposed local streets are 5.5m – 6.0m wide with a 2.5m wide footpath on either side of the road.

Whilst the subject site does not adjoin or have access to the Kishoge Rail Station, the proposed development provides a carefully considered interface with the existing station. Whilst there is no potential to provide for a direct pedestrian link across the rail line to Kishoge Rail Station, provision is made for a connection to a future pedestrian link within adjoining undeveloped land to the west, which will provide access to the Outer Ring Road and the rail station. There are ongoing upgrade and fit out works at the Station which commenced in October 2023 and it is anticipated that the station will be brought into operation sometime during the course of 2024.

## 5.5 Open Space & Landscaping

The central area of public open space within the development comprises a civic square, providing a diverse range of gathering opportunities and active recreational features. The second area of passive open space comprises the railway ecological corridor and incorporates a detention basin. Cumulatively, these areas comprise 0.31 hectares or 13.7 per cent of the overall site area.

An area of communal open space is provided centrally, surrounded by the apartment block and duplex units, providing seating and informal play opportunities, whilst also functioning as a detention basin. This area of open space comprising 0.11 hectares is intended to serve all the apartment units and is in excess of the 0.061 hectare requirement in the Apartment Guidelines.

In addition to this open space provision informal landscaping and open space is incorporated along the local link streets, providing a fine network of local routes connecting local and strategic open spaces. A shared cycle and pedestrian path is provided along the rail line to the southern boundary of the site and large footpaths are provided throughout the development to achieve high performance pedestrian connectivity using ecological corridors. The development incorporates tree lined streets and small scale SUDS features. A comprehensive landscaping scheme has been prepared by Mitchell & Associates with extensive groundcover and shrub planting provided.

The proposed development will require the removal of 17 no. trees and 2 no. tree and shrub groups and the partial removal of 1 no. tree and shrub group. The trees and shrubs to be removed are deemed to be of low and poor quality (C & U Category) and it has been confirmed that their loss will have an insignificant impact on the character and appearance of the wider local surrounding area. The proposed removals have been taken into consideration and substantial new high quality tree planting has been proposed. The Arboricultural Impact Assessment confirms that the proposed new planting will mitigate the loss of trees and have a positive impact on the appearance and amenities of the development and the local surrounding area in the future.

## 5.6 Parking

A total of 95 no. external surface car parking spaces are provided to serve the development. Table 12.24 of the County Development Plan details maximum car parking standards, such that the proposed development is permitted to have a maximum of 131 no. spaces as detailed in Table 3.0. In accordance with Section 12.7.5 of the Development Plan, EV charging comprises a minimum of 20% of the total parking spaces provided. The remainder of the parking spaces are constructed to be capable of accommodating a future charging point.

Table 3.0 Car Parking				
Type	No. Units	Requirement/unit	Requirement	Provided
House	29	1.5 space per 3+ bed units	43.5	95
Apartments	26	0.75 space per 1 bed unit	19.5	
	42	1 space per 2 bed unit	42	
	21	1.25 space per 3 bed unit	26	
Electric Vehicle Recharging Point		20% of car parking spaces Ducting provided to remainder	26	26
<b>TOTAL</b>			<b>131 spaces</b>	<b>95 spaces</b>

A reduced quantum of car parking has been provided on site having regard to the existing and proposed provision of public transport in the area including the location of the site adjoining Kishoge Train Station which is scheduled to be operational in 2024. A number of reports accompany the proposed development from a traffic management perspective including a Traffic Mobility Management Plan which aims to encourage more sustainable mobility patterns amongst the prospective residents.

In terms of bicycle parking, the 29 no. houses have been provided with in-curtilage bicycle parking. A total of 244 no. bicycle parking spaces have been provided for the apartment units in excess of the minimum requirements set out in SPRR 4 - Cycle and Storage, Sustainable Residential Development and Compact Settlements Guidelines for Local Authorities 2024 and the standards in Table 12.23 of the Development Plan. Based on the requirement of 1 bicycle space per bedroom (long-term) and 1 space per two apartments (short term), the bicycle parking has been provided as follows:

Table 4.0 Bicycle Parking						
Unit Type	No. of Units	No. of beds	Relevant Standard	Required	Provided	
Long Term						
Apartment Block A – Secure Storage	23	46	1 space per bedspace	46	47	
Apartment Block B – Secure Storage	24	43		43	57	
Own Door Duplex Units	21	62		63	63	
Own Door Apartment Units	21	21		21	21	
Short Term						
Apartment Block A – Secure Storage	23	46	1 space per 2 apartments	11.5	14	
Apartment Block B – Secure Storage	24	43		12	14	
Own Door Duplex Units	21	62		10.5	21	
Own Door Apartment Units	21	21		10.5	12	
<b>Total</b>				<b>217</b>	<b>249</b>	

The apartment units in Block A & B have been provided with 104 no. secure bicycle parking spaces. The own door duplex and apartment units have been provided with a total of 84 no. bicycle parking spaces. An additional 14 no. bicycle parking spaces have been provided in the Civic Square. A Cycle Audit has been prepared by Malone O'Regan Engineers to accompany the development proposal.

Electric bicycle charging facilities have been incorporated into the development providing charging for 10% of the bicycle parking spaces.

## 5.7 Water Services Infrastructure

An Engineering Services Report has been prepared by Malone O'Regan Engineers which details water service specifications.

An existing network of drainage runs along Thomas Omer Way road to the north of the site. These underground sewers carry surface water runoff towards existing catchment areas in the south-west Dublin area. Due to the relative levels of the existing drainage within the road and the proposed site levels, it is not possible to achieve a gravity connection to the surface water drainage pipework as installed. There is a new South Dublin County Council infrastructure project for the area called Clonburris Infrastructure Ltd. This project will design a new link road to the north of the site with associated surface water and foul water sewers and will be subject to its own consent process. It is proposed to connect into this new network design once operational.

It is anticipated that the road and water infrastructure will commence construction mid 2026 with delivery in 2028 and it is anticipated that completion of the development proposal and the road and water infrastructure will align. No houses on site shall be occupied until such a time as the infrastructure becomes operational.

### *Surface Water Disposal*

With respect to surface water drainage, existing greenfield run-off of the development site has been calculated (6.23/s) and used as the minimum benchmark for the SuDS design, thereby ensuring that the post development run-off will not exceed the greenfield run-off. The run-off calculation is based on the drained area of the new development. Surface water discharges will be retained within the various SuDS systems up to and including the 1 in 100-year event plus 20% for climate change. The proposed SuDS techniques are detailed on the planning drawings and include bioretention swales, tree pits, green roofs, blue roofs, rain gardens, permeable paving and a detention basin.

The SuDS measures not only replicate the pre-development surface water runoff systems and treatment for rainfall, but they also aim to replicate the existing habitats from the pre- development stage. The site has been subdivided into Area 1 & Area 2 for the purpose of managing surface water. Both areas have their own detention basin.

The project is fully compliant with the Greater Dublin Drainage Study (GDDS), a policy document designed to provide for future drainage infrastructure in an integrated manner and to ensure long term improvement to the quality and quantity of storm water run-off in the capital. Surface water runoff from new internal road surfaces, footpaths, other areas of hardstanding and the roofs of buildings will be collected within a gravity drainage network and drained to two detention basins located in the southwestern end of the site and along the southern boundary of the site. The outflow from each detention basin is limited by a Hydrobrake flow control device which restricts the flow to 2.63 litres/s in Area 1 and 2 litres/s in Area 2.

### *Foul Water Drainage*

The foul and process water drainage infrastructure has been designed in accordance with Irish Water Technical Standard for Wastewater Gravity Sewers and the Irish Water Code of Practice for Wastewater Infrastructure. The proposed foul water drainage layout for the development is indicated on Malone O'Regan drawings SHB4-CSD-DR-MOR-CS-P1-130. Foul water from new housing units will be

collected within a gravity drainage network and directed towards the pumping station No.03 for catchment area W, to be delivered as part of the new South Dublin County Council infrastructure project for the area - Clonburris Infrastructure Ltd. A Confirmation of Feasibility has been received from Uisce Eireann.

## 5.8 Construction

Subject to securing consent, it is intended for the main works to commence in Q1 2026. No 'out of the ordinary' construction processes have been identified or are expected.

The timeline is indicative at this stage and is subject to change depending on consent approval, the tender process and other external factors including existing supply chain constraints at the time of going to market. It is assumed that all construction related activity will be undertaken in accordance with best practice / industry guidance and shall adhere to relevant emission, discharge and noise limit thresholds during construction. A Construction & Environmental Management Plan (CEMP) has been prepared in support of the development proposal and will be implemented by the appointed Contractors on site.

Construction operations on site shall generally be limited to standard hours of operation for building sites as follows:

- Monday to Friday 07.00 to 18.00
- Saturday 08.00 to 14.00
- Sundays and Public Holidays no noisy work on site.

It may be necessary for some construction operations to be undertaken outside these times. For example, it may be necessary to make service diversions and connections outside the normal working hours. Deviation from these times may be permitted in exceptional circumstances, where prior written approval has been received from the relevant local authority.



**Figure 4.0** Proposed Site Layout    **Source:** MCORM Architects

## 6.0 ENVIRONMENTAL CONSIDERATIONS

The development strategy and design approach has been influenced by a number of climatic and environmental variables and considerations on the site.

### 6.1 Sustainability & Climate Action

A Climate Action, Sustainability & Part L Compliance Report has been prepared by Semple McKillop Consulting Engineers in accordance with the requirements of Section 12.10.1 in the Development Plan. This report includes a Compliance Report on Part L & HC 12 Building Energy Rating Assignment and Compliance with TGD Part L of the Building Regulations. This report demonstrates compliance with a number of policy objectives in Chapter 3.0 of the Development Plan specifically relating to Climate Action.

The design team has adopted a top down pyramid approach to reduce the demand for energy by designing efficiency into the elements at design stage such as building fabric, glazing, air permeability, HVAC and lighting systems. Whilst the Energy Strategy for the site has yet to be finalised, as ultimately the PPP Company will develop their own proposals for the site, the report does provide output specification to set parameters to be achieved and details some systems that will not be allowed. In line with reducing fossil fuels there will be no fossil fuels (Gas or Oil) on the site in line with the Governments 'Climate Action Plan 2019'. Photovoltaic panels are proposed on the roofs of the buildings and having regard to the location of the site within a Solar Safeguarding Zone, a Glint & Glare Assessment has been prepared by Macroworks, which confirms no potential for adverse impacts.

Maximum U-Values and an air tightness for the development are set out in the Climate Action, Sustainability & Part L Compliance Report which are higher than Part L but are seen as the first step in the Lean, Clean, Green approach implemented to use less energy. The report concludes that the development has the opportunity to deliver a low-cost solution for homeowners through a number of energy efficient, low emission sustainable solutions, in compliance with Policy H7 Objective 2 and Policy QDP11, which supports high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing and new buildings, including retro fitting of energy efficiency measures in the existing building stock. A central district heating system is proposed for the apartment units and to facilitate this an Energy Centre is proposed accommodating internal and external plant and a cold water storage room.

### 6.2 Ecology

There are no identified habitats or species of ecological note within the site.

The site, as assessed in the Ecological Impact Assessment by NM Ecology, comprises habitats of scrub, broadleaved woodland / treeline, hedgerow, neutral grassland and recolonising bare ground. The woodland / treeline is a mature feature of considerable age that is considered to be of local ecological importance. This feature is to be incorporated into the development. The other habitats are considered to be of negligible importance, and they pose no constraint to future development. No field signs of otters, badgers or other large terrestrial mammals were identified at the site. A bat survey was carried out, and bat foraging / commuting activity was relatively low.

### 6.3 Landscape & Biodiversity

The Landscape & Biodiversity Design incorporates wildlife considerations in the retention/ protection/ management and reinforcement of existing hedgerows/treelines and undisturbed areas of grasslands. The approach to landscape design and management was informed by an Arboricultural Assessment undertaken by CMK Hort + Arb Ltd. to provide base-line data on the composition and condition of trees within the site.

The assessment confirms that in visual terms, the removal of trees and shrubs will not have a significant impact on the character and appearance of the surrounding local area and landscape. All trees and shrubs to be removed are of low and poor quality only. The assessment confirms that the site has been left unmanaged for some time and is currently of restricted public benefit. The development presents an opportunity to regenerate the visual amenity value of the site through structured tree planting and appropriate landscape enhancements. Such planting can mitigate the proposed removals and over time, can enhance the local tree cover and diversity of species, which can have a positive impact on the surrounding landscape character.

Existing trees and hedgerows on the site will be protected where possible in line with the objectives of the Landscape & Biodiversity Masterplan and brought back into a managed state and reinforced with new planting. Varied habitats are created for ecological connections and landscape visual amenity including:

- Bioretention tree planting pits;
- Rain Gardens
- New tree planting,
- Vegetable gardening area, and
- Flexible amenity lawn areas.

Planting and management of the landscape areas shall be undertaken in accordance with pollinator friendly management objectives as outlined in the “All Ireland Pollinator Plan 2021-2025. A coordinated approach within the landscape design has been taken to site services, in particular SUDS integration for water management and habitat creation.

### 6.4 Flood Risk Assessment

The purpose of the Flood Risk Assessment (FRA) prepared by Malone O'Regan Engineers is to assess the potential flood risk to the proposed development site and to assess the impact that the development as proposed may or may not have on the hydrological regime of the area in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The study was principally focused on examining flooding risks to the proposed site from the River Griffeen. Whilst there are no hydrological features in proximity to the site, the River Griffeen flows north, 1.3km west of the site until it outlets into the River Liffey 3km north west of the site.

The analysis and flood zone delineation undertaken as part of this FRA indicates that the proposed site is not expected to be impacted during the occurrence of a 0.1% AEP (1 in 1000 year) fluvial flood event. In consideration of the assessment, analysis and recommendations, the overall development of the site is not expected to result in an adverse impact to the existing hydrological regime of the area or to result in an increased flood risk elsewhere.

## 6.5 Appropriate Assessment Screening

An Appropriate Assessment Screening Report prepared by NM Ecology has had regard to inter-alia; Part XAB of the Planning and Development Act 2000 (as amended) and appropriate best practice guidance including: 'Assessment of Plans and Projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission, 2001); and, Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government (DoEHLG, 2010).

The Screening Report concludes that the site is not located within or directly adjacent to any Natura 2000 site. There are no Special Protection Areas (SPAs) in the surrounding area. The closest European site is the Rye Water Valley / Carton Special Area of Conservation (SAC), located circa 5.2 kilometers to the north-west. The closest Proposed Natural Heritage Area (pNHA) to the site, which is located further south beyond the railway line, is the Grand Canal. The AA Screening Report confirms that there is an absence of any potential pathways which could provide a direct hydrological link to these sites.

No European sites will be affected by the proposed development.

## 6.6 Environmental Impact Assessment Screening

An Environmental Impact Assessment (EIA) Screening Report was prepared by HRA Planning to assess the proposed development and to undertake a determination as to the likelihood of significant effects on the environment, and the requirement or otherwise, for Environmental Impact Assessment (EIA). The proposed development of 62 no. dwelling units is below the 500-unit mandatory threshold and represents 12% of the threshold number of dwelling units.

The site area of the proposed development measuring 2.3 hectares in area is not situated within a business district and is significantly below the 10-hectare threshold for urban development<sup>3</sup> in the case of; 'other parts of a built-up area'. The site, therefore, does not trigger mandatory EIA.

The preliminary examination confirms that there is no real likelihood that the proposed development, by reason of its 'nature and size' is likely to give rise to significant effects on the receiving environment, save for localised, short-term temporary impacts associated with the construction stage.

However, taking a precautionary approach and consistent with statutory provisions of Article 120 of the Planning Regulations, along with the published methodological guidance which this assessment is based; the information specified in Schedule 7A (of the aforementioned regulations) for the purposes of a screening determination was prepared.

The screening determination was therefore undertaken having regard to Schedule 7 criteria and Schedule 7A information. Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- The scale, nature and location of the proposed impacts;
- The potential impacts and proposed mitigation measures; and
- The results of the any other relevant assessments of the effects on the environment

It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report is not required.

#### 6.7 Acoustic Design Statement

An Acoustic Design Statement including an Inward Noise Impact, Construction Noise Assessment and Operational Noise Assessment was prepared by Wave Dynamics Acoustic Consultants for the proposed development.

In terms of Inward Noise, a Stage 1 and Stage 2 ProPG assessment were undertaken. The site has been characterised as medium risk for night at the southern boundary and medium to low risk for the daytime period across the rest of the site therefore, mitigation measures are not required to control the onset noise levels. Break-in noise calculations to predict the internal noise levels from road traffic noise were conducted as part of the assessment. Consideration has also been given to the future growth of the roads. Following the assessment, the building envelope performance requirements were determined to achieve adequate internal noise levels. The performance specification for the building envelope has been provided in this report which includes the external walls, glazing, roof and ventilation requirements.

The external amenity spaces on the development include balconies, rear private gardens and a communal amenity space at ground level. Appropriate amenity has been provided on the development for residents using a combination of the balconies on suitable facades, rear gardens for houses and the communal amenity space on ground level. This is in line with element 3(v) of ProPG.

Based on the recommendations in this report it is predicted that the internal and external noise levels will achieve the targeted noise levels in line with BS 82233:2014 and ProPG 2017 guidance.

The construction noise impact is predicted to exceed the BS 5228 requirements without any mitigation measures for all stages of the project and site-specific mitigation measures have been provided in the report to bring the construction noise levels down within the limits of BS 5228. Following the noise mitigation recommendations in this report, the construction phase is expected to meet the requirements of BS 5228 based on the information provided to us. In addition to the mitigation measures, guidance has been provided in this report for construction noise monitoring during the construction period to manage noise levels to manage construction noise.

With respect to operational noise, including noise generated in the communal amenity space, the traffic generated on the development and car parking, and the creche play area, it is predicted that the development will not cause a negative noise impact on the nearby noise sensitive locations. The mechanical plant and equipment specification is not available at this stage of the project, as these projects will be design and build PPP projects. Specific noise limits have been provided for mechanical plant and equipment.

#### 6.8 Daylight & Sunlight Analysis

A daylight/sunlight assessment by Digital Dimensions has been completed and their report is submitted in support of the proposed development. This includes assessing the daylight/sunlight levels received by neighbouring properties, the proposed residential units and the external amenity areas. As noted in the Daylight & Sunlight Analysis report:

- There will be minimal reduction to the available daylight and sunlight levels to the adjacent buildings. There will be no reduction in sunlight to private amenity spaces. The results find that any impact on the adjacent residential structures would be imperceivable. All areas assessed continue to meet or exceed the recommendations of the BRE guidelines (2022).
- 100% of the Living, Dining, Kitchen and Bedroom spaces within the proposed development achieve the target values set out in BS EN 17037:2018+A1:2021 section NA1.
- The scheme is well designed for sunlight with 94.4% of units meeting the minimum recommended 1.5 direct sunlight hours. This is in line with the BRE guideline example for an apartment layout where 1 in 5 achieves the target sunlight hours.
- All of the proposed public and communal amenity spaces achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st March. 76.5% of private amenity spaces (rear gardens) achieve the target sunlight levels. The private amenity space is deemed to be well considered and designed.

These favourable results suggest careful consideration to the design layout. The scheme performance assessment for this report has quantified the level of daylight and sunlight within the proposed development. The study shows that all apartments meet the minimum standard for daylight provision as per BS EN 17037:2018+A1:2021 as referred to in the BRE guidelines BR209:2022 (third edition). The majority of the apartment units achieve daylight provision as set out in IS EN 17038:2018.

In conclusion, it is the opinion of Digital Dimensions that the scheme is performing very well from an impact and scheme performance point of view.

## 6.8 Construction Environmental Management Plan

The Planning Scheme requires the preparation of a Construction Environmental Management Plan (CEMP) in advance of the physical elements proposed as part of the Planning Scheme. A CEMP has been prepared by Panther Environmental Solutions, which includes the construction phase mitigation and monitoring measures required by the development.

# 7.0 NATIONAL POLICY & GUIDELINES

## 7.1 National Planning Framework – Project Ireland 2040

The National Planning Framework (NPF) published in February 2018 sets out a strategic development strategy for the country up to 2040. Amongst its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments. The emphasis within the NPF with respect to future development relates to managing the sustainable growth of compact cities, towns and villages to achieve effective density and consolidation supported by effective public transport infrastructure.

The NPF sets high level planning objectives (National Strategic Outcomes) in order to meet the national objectives, including:

- Compact Growth
- Enhanced Regional Accessibility
- Strengthened Rural Economies and Communities
- Sustainable Mobility
- A Strong Economy, supported by Enterprise, Innovation and Skills

- High-Quality International Connectivity
- Enhanced Amenities and Heritage
- Transition to a Low Carbon and Climate Resilient Society
- Sustainable Management of Water, Waste and other Environmental Resources
- Access to Quality Childcare, Education and Health Services

The NPF provides for a number of National Policy Objectives (NPO) which must be adhered to in the advancement of development throughout the State. The NPF seeks to “*deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements*” (NPO 3a) and seeks to “*deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints*” (NPO 3b). It highlights the importance of development within existing urban areas by “*making better use of under-utilised land including ‘infill’ and ‘brownfield’ and publicly owned sites together with higher housing and job densities, better services by existing facilities and public transport*”.

The NPO’s promoting consolidation are further supported by NPO 11 which states that “*in meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth*”.

A recurring theme in the Plan is the requirement to ensure that the future growth of Dublin occurs within its Metropolitan limits. The infill/brownfield targets set out in NPOs 3a, 3b and 3c of the NPF recognises the necessity for significant and sustained increase in urban housing output and in particular apartment type development. The NPF states that this is necessary, in order to avoid a continuation of the outward expansion of cities and larger urban areas. The NPF states that “*in many European countries, it is normal to see 40%-60% of households living in apartments*”.

NPO 33 seeks to “*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*”. NPO 4 seeks to “*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*”. The proposed development provides for the creation of an attractive, high quality, sustainable new development within existing built-up urban area.

The proposed development complies with a number of the NPO’s within the NPF with particular regard to development within the existing built up footprint of a settlement, on an underutilised suburban site in close proximity to public transport. The proposed development is a strategically located underutilised site within the urban extent of Dublin city and suburbs, on land identified for significant growth where development is coordinated by a detailed Planning Scheme, in proximity to Kishoge Rail Station and employment opportunities and Grange Castle Business Park.

## 7.2 Climate Action Plan 2024

On 20 December 2023, the Government launched its Climate Action Plan 2024 (CAP24) its third annual update to Ireland’s Climate Action Plan 2019, the first CAP to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021 and following the introduction in 2022 of economy-wide carbon budgets and sectoral emissions ceilings. The plan provides for the

implementation of the carbon budgets and sectoral emissions ceilings and establishes a roadmap to halve national greenhouse gas emissions by 2030 and achieve net zero no later than 2050.

On the role of the public sector, CAP24 states the following:

*"The public sector will play a leadership role in driving far-reaching climate action across its buildings, transport, waste, and energy usage, as well as wider society. This will include reducing emissions by 51% by 2030 and increasing the improvement in energy efficiency in the public sector from the 33% target in 2020 to 50% by 2030, as well as increasing climate literacy in the public sector, implementing green public procurement and retrofitting public sector buildings."*

CAP24 acknowledges the role of waste prevention and the circular economy in driving down greenhouse gas emissions *"through maximising the efficiency of our material use"*. It identifies key actions related to circular economy and waste, including the implementation of the WAPCE and Whole of Government Circular Economy Strategy, and the prevention of plastic, food, construction and commercial waste. It states that *"Avoiding waste in the first instance is a climate action we can take every day"*.

Chapter 14 of the CAP specifically addresses the role of built environment in decarbonisation. It notes that the sector accounted for 11.1% of Ireland's greenhouse gases in 2022, down from 12.3% in 2021. The residential sector accounts for the majority of these – at 10.2% of total emissions. To play its part in achieving these targets, the residential sector will need to reduce its emissions by ~20% by 2025 relative to 2018 levels. CAP24 sets out key decarbonisation targets for the built environment sector as follows:

- All new dwellings designed and constructed to Nearly Zero Energy Building (NZEB) standard by 2025, and Zero Emission Building (ZEB) standard by 2030;
- Equivalent of 120,000 dwellings retrofitted to BER B2 or cost optimal equivalent by 2025, and 500,000 dwellings by 2030;
- Up to 0.8 TWh of district heating installed capacity by 2025, and up to 2.5 TWh by 2030;
- 170,000 new dwellings using heat pumps by 2025, and 280,000 by 2030
- 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030

This bundle of social housing is currently programmed to deliver homes to be occupied by 2026. Under the 25-year PPP Company maintenance agreement, this means that the homes will be returned to the State after 2050 which coincides with the target date for reaching carbon neutrality. The Climate Action, Sustainability & Part L Compliance Report, prepared by Semple McKillop Consulting Engineers as detailed in Section 6.1 of this report acknowledges that the development has the opportunity to deliver a low-cost solution for home owners through a number of energy efficient, low emission sustainable solutions. The houses and apartments will be energy efficient and meet current Building Regs and NZEB requirements, achieving a BER A2 for dwellings.

### 7.3 Ministerial Guidelines

A number of national planning guidelines may be considered of relevance to the development proposal, including:

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Design Manual for Quality Housing (2022)

- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024
- Urban Design Manual - A Best Practice Guide (2009)
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Streets (2013)
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights- Guidelines for Planning Authorities (2018)

However, in the case of a SDZ Planning Scheme, Section 170(2) of the Planning & Development Act 2000, as amended will continue to apply and supersede any contrary provisions (including Specific Planning Policy Requirements) contained in Guidelines until the Planning Scheme is amended to integrate changes arising from the Guidelines. This is to ensure that the consequences of the updated standards can be fully integrated into the planning schemes in due course without unintended consequences. Accordingly, the appropriate consideration in this instance in terms of compliance with relevant standards is the Clonburris SDZ Planning Scheme which is further considered in Section 10 of this report.

Irrespective a number of Guidelines have influenced the overall design approach as detailed hereunder:

#### **Design Manual for Quality Housing**

This Manual seeks to provide guidance on the design of Social Housing developments in respect of site layouts and the internal layouts of individual dwellings, principally to local authorities and Approved Housing Bodies (AHBs), and their consultants. The sample site layouts included in the Manual set out the urban design and placemaking priorities, consistent with compact growth, to assist in the delivery of high-quality and sustainable housing developments. The Manual seeks to promote a consistent approach nationally by local authorities and AHBs in respect of design priorities and space standards.

The principles of the Design Manual have been incorporated into the proposed development, including the urban structure, permeability, density and diversity in design.

#### **Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024**

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009. The Guidelines build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. The Guidelines expand on higher-level policies of the National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

To achieve compact growth, the Guidelines support medium-density housing models, alongside traditional housing and apartment developments, recognising the significant population growth forecast and changing demographics. The guidelines also recommend specific standards for housing, such as minimum separation distance, private and public open space provisions, and car parking. The location

of the proposed development, in proximity to Kishoge Rail Station and a significant employment centre, Grange Castle Business Park, associated with a reduction in car parking on site as detailed in Table 3.0 of this report to encourage modal shift, supports and implements the general aims of the Guidelines.

Clonburris is identified as a City – Urban Neighbourhood in Table 3.1 of the Guidelines on lands around existing or planned high-capacity public transport nodes or interchanges Table 3.1 of the Guidelines provides the density ranges for such sites and states it is a policy and objective of the Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork. The proposed development with a net density of 50.9 dwellings per hectare falls within the range of density provisions promoted in the Guidelines.

#### **Urban Design Manual - A Best Practice Guide (2009)**

The core principles of design, including place-making, environmental responsibility, social equity and economic viability, that are required when creating places of high quality and distinct identity are detailed. There are 12 'Best Practice Design Manual' criteria which should be incorporated in new residential development. The 12 criteria are assessed in the Architectural Design Statement prepared by MCORM Architects, demonstrating how they have influenced the overall design approach on the site, including:

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

#### **Design Manual for Urban Roads and Streets**

Section 1.2 of DMURS requires that street layouts be interconnected to encourage walking and cycling and offer easy access to public transport. Notwithstanding the limited area of the site, every effort has been made to facilitate pedestrian and cycling connectivity with a Link Street provided between Blackthorn Drive and Cedar Road. Compliance with the requirements of DMURS can be found in the report prepared by the project Engineers Malone O'Regan.

#### **Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities**

These Guidelines are applicable to the 89 no. proposed apartment units only.

The Guidelines provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland. A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations in cities and towns that may be suitable for apartment development. The subject site is located within an area defined in the Guidelines as an 'Intermediate

Urban Location' being a site within reasonable walking distance of an employment location and within 1,000 – 1,500m of high capacity urban public transport. These sites are generally deemed suitable for small to large-scale (will vary subject to location) and higher density development (will also vary) development which may wholly comprise apartments.

Table 5.0 Specific Planning Policy Requirements Apartment Guidelines 2022

SPPR Number	Summary	Development Compliance
SPPR 1	Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms	Proposed mix is as follows: 26 no. 1-bed units; 42 no. 2 bed and 21 no. 3 bed units. The 1 bed units therefore comprise 29% of the overall development in compliance with SPPR1
SPPR 3	Minimum Apartment Floor Areas apply including: 1-bedroom apartment – 45 sqm 2-bedroom apartment - 73 sqm 3-bedroom apartment - 90 sqm  The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard, by a minimum of 10%	The proposed apartments have been designed to exceed minimum floor areas including 1-bedroom apartment – 50.4 – 71.5sqm 2-bedroom apartment – 77.7 – 85.9sqm 3-bedroom apartment – 110.6 – 133.5sqm  As per the minimum floor areas in the Guidelines the development must have a minimum floor area of 6,126sqm. Allocating the 10% additional floor area requirement and the proposed floor area of the development would be 6,738.6sqm. With a floor area of 7,184.18sqm the minimum floor area of the apartment units has been exceeded by 17.2%.  Please refer to the schedule of accommodation prepared by MCROM Architects.
SPPR 4	Dual Aspect - In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.'	Some 91% of units (81 no.) are dual aspect units, including all two and three bedroom units.
SPPR 5	Floor to ceiling heights - 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	Floor to ceiling height of ground floor apartment units is 3.4m.
SPPR 6	Apartments per core - A maximum of 12 apartments per floor per core may be provided in apartment schemes.	Block A has 4 no. units per core

There are a number of non-specific policies in the Guidelines with which the proposed development has had regard to. Appendix 1 of the Guidelines contain minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. Storage for bulky items outside individual units has been provided at undercroft level. The schedule of accommodation prepared by MCORM Architects details compliance with these standards.

In relation to the provision of communal amenity space for the development, a total of 397sqm has been provided along the western boundary of the development to serve the apartment units, inclusive of a dedicated play area for younger people (392sqm required). A dedicated toddler and younger child play area is provided for within the communal open space area.

#### Urban Development and Building Heights- Guidelines for Planning Authorities

Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is significant scope to build up and consolidate the development of existing urban areas. There is therefore a presumption in favour of buildings of increased height in town/city cores and in other urban locations with good public transport accessibility.

SPPR1 of the Guidelines specifies that,

*"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 Clonburris SDZ Planning Scheme details specific standards with respect to built form and design including building height. The Planning Scheme seeks to ensure that development across the SDZ lands is carried out in a design led manner that prioritises place making and accords with the core principles of urban design and the creation of integrated streets. Accordingly, the appropriate consideration in this instance in terms of compliance with relevant standards is the Clonburris SDZ Planning Scheme which is further considered in Section 10 of this report.

## 8.0 REGIONAL POLICY

### 8.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019-2031)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) sets out a twelve year strategic development framework for development and transcribes the NPF objectives to the regional level. The RSES is a strategic document, which identifies high-level requirements and policies for the Eastern and Midland Region, setting out the high-level statutory framework to empower each local authority to develop County Development Plans (CDPs) and Local Area Plans (LAPs) that are coordinated with regional and national objectives.

The Regional Settlement Hierarchy provides for three distinct areas across the Eastern and Midland Region comprising of the Dublin Metropolitan Area, the Core Region and the Gateway Region. The subject site located within the Dublin Metropolitan Area and the strategy intends to support the continued growth of Dublin as our national economic engine and deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP). The RSES supports the consolidation and re-intensification of infill, brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs and in the key metropolitan towns, and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

With respect to housing delivery, the RSES promotes the sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, there is a target to achieve 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. The RSES supports a steady supply of sites to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport. RPO 5.5 supports the right housing and tenure mix within the Dublin Metropolitan Area and promotes a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES.

In order to achieve the NPF targets in respect of compact growth, the Metropolitan Area Strategic Plan (MASP) contained within the RSES, identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. These include a number of identified sites including Clonburris SDZ. Clonburris is identified on the south west strategic corridor within the MASP and the consolidation of development along this corridor is an objective of the RSES. The south west corridor is identified as having an additional population capacity in the short term of 45,000 with a further 21,000 in the medium term. In this regard, Table 5.1 of the MASP states that the following will be supported on this strategic corridor: *“continued development of Adamstown SDZ and the phased development of Clonburris located strategically between the west Dublin suburbs of Lucan and Clondalkin”*.

The proposal seeks to provide for residential development on an underutilised site within the Clonburris SDZ which seeks to provide appropriate densities, heights in response to both national policy, existing site characteristics and the surrounding context.

Whilst the vision and objectives in the RSES are strategic in context and nature, the wider objectives of the RSES have been complied with by reason of compliance with the national guidelines as detailed above. Further, relevant objectives in the RSES have been translated into local policy via the South Dublin Development Plan 2022 – 2028 as referenced in Policy Objectives RSES1 which seeks to ensure consistency with and support the achievement of the Regional Spatial Objectives (RSOs) and Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy.

## 8.2 Transport Strategy for the Greater Dublin Area 2022-2042

This strategy has been prepared by the National Transport Authority and was adopted in January 2023. The overall aim for the Strategy is to provide sustainable, accessible and effective transport for the Greater Dublin Area (GDA) in response to the region's climate change requirements, need to serve urban and rural communities and support economic growth.

The overall aim of the strategy is: *“to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy”*. The Strategy includes five overarching strategic objectives to achieve the vision which are as follows:

- An Enhanced Natural and Built Environment
- Connected Communities and Better Quality of Life
- A Strong Sustainable Economy
- An Inclusive Transport System

The Strategy sets out key challenges which have informed the Strategy which include climate change, the Covid-19 pandemic, rebalancing road spaces to favour sustainable modes of transport, ensuring access for all and serving more rural communities. Measure RAIL 6 confirms that the NTA, in conjunction with Irish Rail, will develop new rail stations. Kishoge station will also open in the short term as development of the Clonburris SDZ is realised.

## **9.0 LOCAL POLICY – SOUTH DUBLIN DEVELOPMENT PLAN 2022 – 2028**

The South Dublin County Development Plan 2022 – 2028 is the statutory plan for the area and guides new development throughout the South Dublin County.

### **9.1 Core Strategy**

Section 2.7.1 of the Core Strategy sets out 'Key Urban Centres within the Dublin City and Suburbs' which includes the County's Strategic Development Zones (SDZ). In respect of Clonburris, the Core Strategy states that the approved SDZ Planning Scheme (2019) represents a major expansion of the footprint of Clondalkin along the Dublin – Cork rail corridor. It further states that the Council will continue to actively promote the delivery of sufficient public transport and road capacity, in tandem with future development of the SDZ. Significant funding has been achieved through the Urban Regeneration Development Fund (URDF) to provide infrastructure to facilitate early development during the lifetime of the Development Plan.

Table 9.0 Core Strategy confirms that Clondalkin, Clonburris and Grange Castle, collectively have the potential to deliver 5,099 units. Policy CS7 seeks "*to promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary*".

Policy CS7 Objective 4 seeks "*to promote and facilitate development at the Strategic Development Zones of Adamstown and Clonburris, in accordance with their planning scheme and associated phasing requirements, whilst adapting to and facilitating emerging transport service level pattern needs*".

The proposed development will deliver an appropriately scaled level of residential development and will contribute towards the housing target for the overall County over the Development Plan period, while also facilitating delivery of the Clonburris SDZ. The proposed development seeks to support the transition to a low carbon and climate resilient agenda facilitating compact growth and increased integration between land-use and transportation. As such the proposed development can be considered to be entirely in accordance with the Core Strategy and Policy Objective CS7 in the development plan which seeks to support the delivery of the Core Strategy in accordance with the Planning Scheme for Clonburris.

### **9.2 Zoning**

The subject site is zoned objective SDZ '*to provide for strategic development in accordance with approved planning schemes*.' Accordingly, the Clonburris SDZ Planning Scheme contains the relevant development management standards pertaining to the site.

Policy QDP15 seeks to continue to implement the approved Planning Schemes for Adamstown and Clonburris SDZs, whilst QDP15 Objective 1 seeks to support the delivery of the identified infrastructure to facilitate sustainable development in South Dublin's Strategic Development Zones.

## 10.0 COMPLIANCE WITH THE CLONBURRIS SDZ PLANNING SCHEME

An Bord Pleanála approved the Planning Scheme subject to modifications by Order dated the 8th of May 2019.<sup>1</sup>

The Planning Scheme provides for the establishment of three Character Areas - Clonburris, Kishoge and Adamstown Extension. Clonburris and Kishoge will each focus around an urban centre established at the two points of highest accessibility within the SDZ lands, namely Clondalkin-Fonthill and Kishoge railway stations. Adamstown Extension will extend the community of Adamstown to the south-east and will be separated from Kishoge by parklands.

The development of the entire planning scheme is expected to deliver a target of 8,437 new residential units, a minimum of 7,300 sq.m gross community floor space, approximately 21,520 sq.m gross retail floorspace and between 30,000 and 40,000 sq.m employment floorspace. It is envisaged that the SDZ would support a population of c.21,000 people with approximately 2,400 jobs and 6,000 school places. It is also envisaged that the scheme will provide four no. primary schools and four no. post-primary schools.

Strategic Development Zone (SDZ) Planning Schemes effectively translate development plan policies and objectives to a district or neighbourhood level and provide for a more in-depth consideration of planning issues that are specific to a particular area. A Planning Scheme is deemed to form part of the development plan in force in the area and as confirmed in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024, *“any contrary provision of the development plan shall be superseded by the Planning Scheme”*.

### 10.1 Development Areas

Most of the site is located within a ‘residential area’ (KNE-S4) within the Character Development Area 10 with the south west corner of the site located within a defined mixed use area, KUC-S2 (Kishoge Urban Centre), within Character Development Area 6, as defined in Figure 4.0. Some 1.66 hectares of the site comprises land situated within KNE-S4, whilst 0.64 hectares comprises KUC-S2.

Figure 2.4.2 of the Planning Scheme identifies ‘Fine Urban Grain’ locations, identifying fixed building lines, which largely front to main streets and also flexible inner lines between blocks. In locations located in areas identified for urban grain, there is a restriction of maximum building frontages of 10 metres in these locations. The proposed development complies with this requirement.

The SDZ document sets out several guiding principles to further detail the urban structure for the SDZ lands to ensure an integrated and holistic approach. The following, as outlined in the SDZ Planning Scheme, have been considered by the Design Team for the proposed development:

- Block forms shall be perimeter blocks and encourage permeability;
- Building frontage to all sides;
- Continuity of building frontage;
- Adequate separation distances;
- Appropriate building setbacks in line with ground floor uses;
- Adequate arrangements for car parking;
- Consideration and provision of ‘fine urban grain’ within block/cell structure.

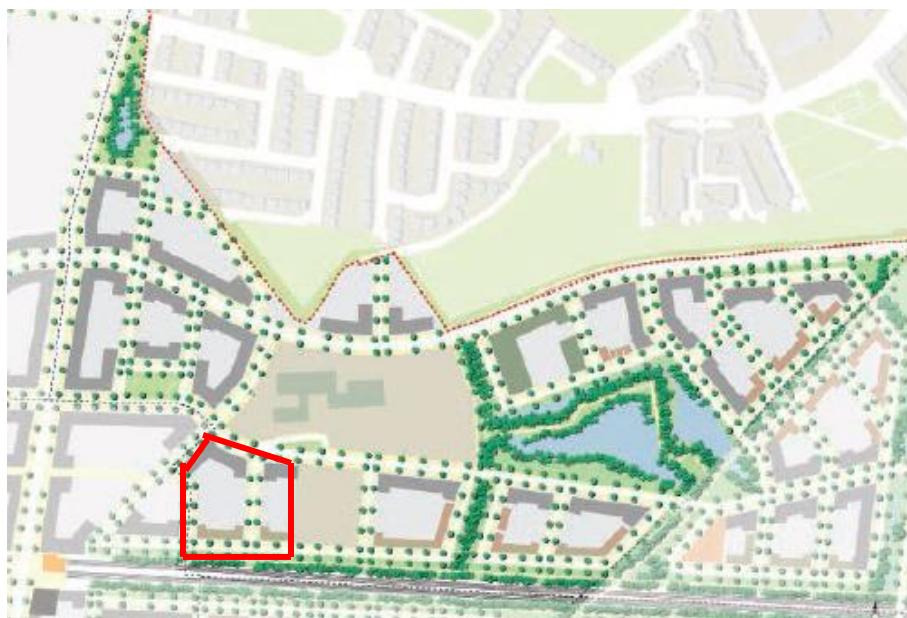


**Figure 5.0** Location of Site within Clonburris SDZ outlined in red

The principle of all designated streets under the Planning Scheme is fixed and the alignment of each street including its centre line (see Figure 2.8.5 in Section 2.8 – Building Centre Line & Urban Grain) are either fixed or flexible depending on typology. The arterial streets and link streets are fixed whereas the local streets are flexible.

It is noted the Planning Scheme outlines that some slight plot adjustment for each Sub Sector may be acceptable provided that this would not affect prescribed dwelling numbers/densities or non-residential floorspace for any Sub Sector; would not significantly affect the gross or net development area of any Sub Sector. Full details relating to how the proposed development complies with the Clonburris SDZ Planning Scheme are provided in this Planning Report and in the Architectural Design Statement, as prepared by MCORM Architects and is submitted with this application under separate cover.

An analysis of each of the Sub-Sectors is undertaken in the context of the required parameters set out in the Planning Scheme and demonstrates compliance with the quantitative parameters for each sub-sector. Of note, there have been no other planning consents permitted in either of the two sub-sectors promoted below, such that no cumulative development considerations arise.

*Character Development Area 10: KNE-S4***Figure 6.0** Development Area 10 with part of Site outlined in Red

Parameter	Requirement	Proposed
Net Development Area	4.72 hectares	1.67 hectares
No. of Units (Target)	260	75
Net Density	45 – 55uph	45uph
Building Height	2 – 6 storey	2 – 4 storey
Public Open Space	3,300sqm	1,615sqm

**Table 6.0** Sub-Sector KNE-S4 Development Parameters*Character Development Area 6: KUC-S2***Figure 6.0** Development Area 6 with part of Site outlined in Red

Parameter	Requirement	Proposed
Net Development Area	2.79 hectares	0.64 hectares
No. of Units (Target)	349	43
Net Density	60 – 125uph	66.5uph
Non retail commercial	2,400sqm	-
Retail Development	300sqm	-
Building Height	2 – 8 storey	3 – 6 storey
Public Open Space	-	874sqm

**Table 7.0** Sub-Sector KUC-S2 Development Parameters

### 10.3 Landscaping, Public Open Space, Green Spaces

The key principles in relation to open space, detailed in the Planning Scheme, are to:

- Provide a hierarchy of high quality and multi-functional open spaces including, strategic spaces, local parks, urban spaces and strategic routes;
- Allow the movement network to connect to and through open spaces by providing safe, well-overlooked and accessible routes;
- Provide appropriate space for health and well-being, required to meet the recreational needs of the new population of Clonburris through the provision of adequate walking and cycling facilities and a diversity of green spaces for active and passive recreation; and,
- Provide recreation facilities and open spaces that are capable of accommodating a range of community sport and recreation needs and use by the community at varying times including after school hours.

The SDZ Planning Scheme provides a hierarchy of high quality and multi-functional open spaces including strategic spaces, local parks, urban spaces and strategic routes. The main active outdoor recreation facilities of the overall development at Clonburris will largely be accommodated in the three main parks on the SDZ lands: the extension to Griffeen Valley Park, Grand Canal Park and Na Cluainte Park. Save for the identification of a railway ecological corridor adjoining the rail line, there is no specific requirement in the SDZ for open space provision. Figure 2.10.1 of the Planning Scheme illustrates the requirement for delivery of a 'local green corridor' within the subject site.

The proposed development accommodates a central area of public open space comprising a civic square, providing a diverse range of gathering opportunities and active recreational features. This area is located centrally within the development overlooked by apartments and houses. The second area of passive open space comprises the railway ecological corridor or 'local green corridor' and incorporates a detention basin. Cumulatively, these areas comprise 0.31 hectares or 13.7 per cent of the overall site area.

In addition to this open space provision informal landscaping and open space is incorporated along the local link streets, providing a fine network of local routes connecting local and strategic open spaces. The proposed development delivers the key structuring principles of the open space strategy through the inclusion of the Kildare railway line green corridor A shared cycle and pedestrian path is provided along the rail line to the southern boundary of the site and large footpaths are provided throughout the development to achieve high performance pedestrian connectivity using ecological corridors. A comprehensive landscaping scheme has been prepared by Mitchell & Associates with extensive groundcover and shrub planting provided.

The development incorporates tree lined streets and small scale SUDS features. The Planning Scheme recognises SUDs as a green infrastructure approach to drainage and storm water management and requires the production of a detailed Surface Water Management Plan which must adhere to the principles and plan for surface water management within the entire SDZ area. The proposed SUDs strategy includes tree pits, bioretention areas/rain gardens, permeable paving, green roofs, detention basin and swales.

## 10.2 Dwelling Mix

According to Section 2.1.6 of the Planning Scheme, the range of dwellings permitted in Clonburris include houses, townhouses, duplex units, maisonettes and apartments (including Build to Rent and Shared Accommodation) and that *“in order to facilitate market flexibility over the lifetime of the Planning Scheme, a detailed breakdown of unit types is not specified.”*

The proposed development provides a wide range of apartment, duplex and housing units so as to contribute towards dwelling mix and to provide quality, affordable accommodation and choice to future residents. Full details relating to the design and size of each individual unit is provided in the Housing Quality Assessment (HQA) and Architectural Design Statement prepared by MCORM Architects and submitted with this application.

The Planning Scheme states that all apartments shall accord with or exceed the open space and floor area standards set out in Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2015) and any superseding guidelines including the minimum floor areas set out in Table 2.1.10 of the Planning Scheme. An apartment refers to a dwelling unit that is not a house and may comprise an apartment, maisonette or duplex unit.

Table 5.0 of this report already demonstrates compliance with the Design Standards for New Apartments 2022, including minimum floor areas. It should be noted that the quantitative parameters influencing apartment size, including unit storage, private and communal open space specified in Table 2.1.10 of the Planning Scheme are the same as those promoted in the Guidelines. It is thus submitted that Table 5.0 of this report and the HQA prepared by MCORM Architects demonstrates full compliance with minimum apartment standards.

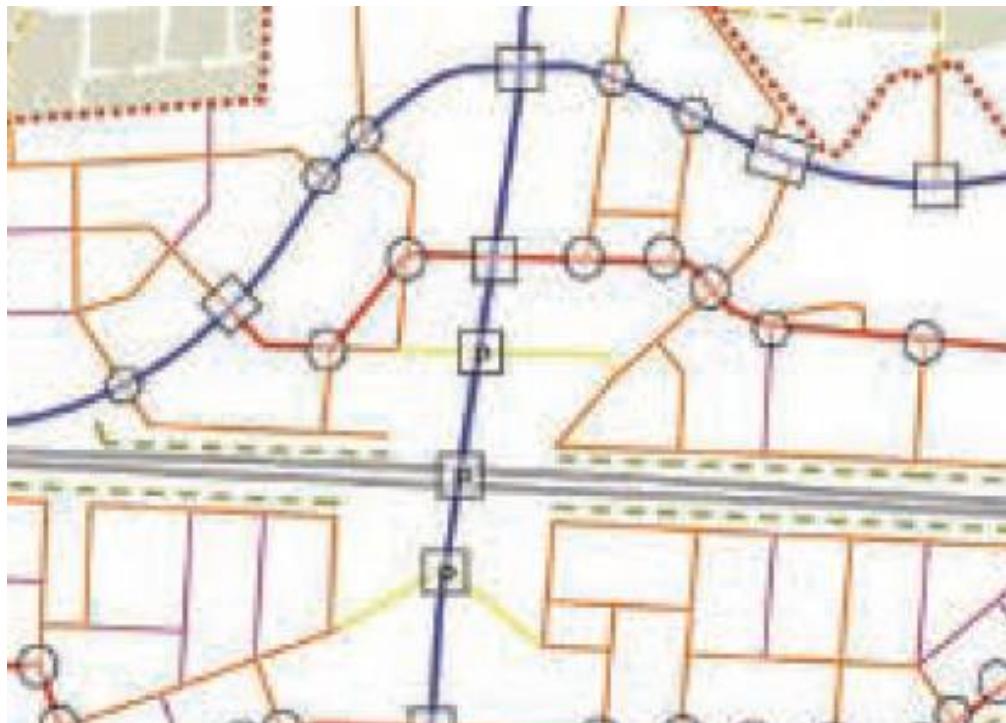
## 10.3 Movement and Transport

The key principles of the Planning Scheme in relation to movement and transport are to:

- Link the Development Areas of Clonburris with each other and with surrounding communities through a permeable and clear hierarchy of integrated streets and dedicated pedestrian and cycle routes;
- Integrate appropriate pieces of infrastructure that overcome challenges to movement;
- Develop a transport framework that maximises route choice and access to residential, education, retail, service, community and leisure uses by means of walking, cycling and public transport while balancing the needs of the car;
- Upgrade existing sections of strategic roads within the SDZ lands to integrated urban streets.
- Seek the delivery of public transport infrastructure and services that will serve the trips demands of the SDZ Planning Scheme.

The Planning Scheme is formulated to ensure that development within the SDZ lands will be afforded direct or indirect access to dedicated pedestrian and cycle routes (strategic and local), Link Streets and

Arterial Streets, as detailed in Figure 7.0. The proposed internal road layout responds to the requirements of the Clonburris Planning Scheme set out in Section 2.2.7 and generally comprises 'local streets' with an 'intimate local street' (home zone located to the east of the site, serving the two storey houses). Generally, the proposed local streets are 5.5m – 6.0m wide with a 2.5m wide footpath on either side of the road.



**Figure 7.0** Road Hierarchy with Site outlined in Red

Vehicular access is provided to the development off Lynch's Lane, a proposed Local Street within the Planning Framework. There is no direct vehicular access from the development proposed to the Link Street to the north, although pedestrian and cycle access will be facilitated.

The Link Street to the north is to be delivered by Clonburris Infrastructure Limited, with construction on site due to commence in mid – late 2026 with an estimated completion date of Q3 2028. The proposed development has been designed taking account of the proposed road alignment thereby ensuring that both projects can seamlessly integrate once constructed.

The car parking standards for the key land uses in Clonburris are set out under the South Dublin County Development Plan 2022-2028. The Planning Scheme states that Zone 2 parking standards prescribed under the South Dublin County Council Development Plan 2022 – 2028 shall be applied to all areas that have been identified in the Planning Scheme with an accessibility level of 1, 2 or 3. The subject site is in Level 1 and this means Zone 2 standards apply. Table 3.0 Car Parking in this report demonstrates compliance with car parking standards, detailing a maximum requirement for 131 no. spaces but providing reduced parking of 106 no. spaces. Table 3.0 also details the provision of 20% of car parking spaces with EV charging points. Full details relating to the provision of car parking spaces are included in the Traffic and Mobility Management Plan submitted under separate cover.

Similarly, Table 4.0 Bicycle Parking in this report demonstrates how the provisions of the Planning Scheme and the South Dublin County Development Plan 2022 – 2028 have been complied with in

respect of bicycle parking. An allowance has been made to facilitate the parking of larger cargo bikes and provision has been made of 10% of the bicycle parking spaces to be provided with EV charging points.

#### 10.4 Urban Centre

Section 2.4 of the Planning Scheme relates to Urban Centres which are considered to be central to the development of the SDZ which seeks to develop vibrant mixed use centres around Clonburris and Kishoge railway stations as part of a hierarchy of urban centres to serve Clonburris.

Part of the subject site is located within Development Area 6 of the Kishoge Urban Centre. However, given that only a small area of the development extends into this sector (0.64 hectares), the proposed development does not provide for mixed uses but rather concentrates on the delivery of higher density housing in the form of apartments and duplex units.

Cognisance has also been had to a recently permitted development on the southern side of the rail line within Development Area 6, comprising Sub Sector KUC-S4 and part of KSE-S1. Planning permission has been granted for a significant mixed use development (SDZ23A/0043) in accordance with provisions set out in the Planning Scheme. The proposed mixed use development will provide for significant services and amenities within the defined Kishoge Urban Centre including 2,502sqm of retail floorspace (a large 2 storey retail unit and 2 no. independent retail units); 4,607sqm of employment floorspace and 2 no. independent employment units; 483sqm creche; and public open space including an urban plaza.

Residential units are permitted within the defined urban centre and within sub sector KUC-S2, as detailed in Table 7.0, 349 no. residential units are targeted for delivery. The proposed development seeks to deliver 43 no. of these units, or 12.3 per cent, in full accordance with the provisions of the Planning Scheme.

#### 10.5 Childcare

Section 2.7 of the Planning Scheme seeks to facilitate the balanced provision of community facilities and services for the residents of Clonburris to promote health and well being, social inclusion and quality of life. The Planning Scheme has had regard to the Childcare Guidelines and has planned the delivery of childcare facilities throughout the SDZ area. It requires a minimum of one purpose built facility in the Clonburris Urban Centre and one in Kishoge Urban Centre. As set out in Table 2.7.2 of the Planning Scheme, a childcare infrastructure minimum capacity of 100 childcare spaces (full day care) is required within the Kishoge Urban Centre. It is noted that the phasing requires the developer to demonstrate that there is available provision within the catchment.

Section 2.4 of the Guidelines details appropriate locations for childcare facilities and requires that one childcare facility is provided for every 75 units. Having regard to the provision of the Apartment Guidelines 2022 and the Childcare Guidelines 2001, the proposed development comprises 92 no. units which can accommodate families (ie 2 bed+). The Childcare Guidelines stipulate that planning authorities should require one childcare facility (providing a minimum of 20 no. childcare places) per 75 no. dwellings. On this basis, the proposed development of 92 no. units, excluding one bed units, would be required to provide a minimum facility of 24 no. spaces.

A facility of 24 no. spaces is too small to be viable and a larger facility would also not be viable having regard to recently permitted creche facilities in the vicinity of the site. It is noted that planning permission has already been granted for a development within Kishoge Urban Centre for a creche facility of 483sqm, with capacity for 87 no. children. This site is located in proximity to the proposed development, just south of the rail line.

In addition to the permitted development with the creche adjoining the subject site, there are further permitted developments within the wider SDZ area which also accommodates creche facilities including SDZ21A/0022 (Tile 1) which includes a 534sqm creche, the permitted SDZ22A/0018 (Tile 2) which includes a 609sqm creche and permitted SDZ22A/0010 which provides a 599sqm creche. There are also a number of existing operational creche facilities located in proximity to the site on the northern side of the Thomas Omer Way Road, including Happy Tots with capacity for 39 no. children and Learn and Laugh Childcare with capacity for 45 no. children.

Having regard to the coordinated and planned provision of childcare facilities in across the Clonburris SDZ as per the Planning Scheme, the proposed development is considered to align with the Childcare Guidelines and the requirements of the Planning Scheme with respect to childcare provision.

#### 10.6 Phasing

As set out in the Planning Scheme in Chapter 4.0, “*the phasing programme is based on the premise that the number of dwelling units that may be constructed and occupied in each phase of development and is dependent on a predetermined amount of works to provide infrastructure, services, facilities and amenities having been completed to serve each phase*”.

It is necessary to demonstrate compliance with the phasing requirements set out in the Planning Scheme. It should be noted that the joint landowners of the SDZ lands, which includes South Dublin County Council, are currently finalising a development agreement for Clonburris SDZ which will ensure the coordinated delivery of all necessary infrastructure in tandem with housing delivery. For context, an outline of the permitted and proposed planning applications within the Clonburris SDZ are detailed in Table 8.0.

Table 8.0 Permitted and Proposed Development in Clonburris SDZ

Reg Ref.	Development Area	No. of Units Proposed and Permitted	No. of Units Permitted	Planning Status
SDZ21A/0022 (Tile 1)	Clonburris South West	563	563	Under Construction
SDZ22A/0017 (Tile 3)	Clonburris South West	157	157	Granted
SDZ22A/0018 (Tile 2 & 3)	Clonburris Urban Centre and South West	594	594	Granted
SDZ23A/0018 (Tile 4 & 5)	Clonburris South West	565	565	Granted
SDZ22A/0010	Clonburris Urban Centre and South West	294	283	Granted
SDCC Part 8	Canal Extension	118	118	Approved

Sub Total Clonburris Catchment		2,291	1,715	
SD228/0003 SDCC Part 8	Kishoge South West	263	252	Approved
SDZ23A/0043 (Tile 6)	Kishoge Urban Centre	495	495	Granted
SDZ22A/0011	Kishoge North East	Primary School		Granted
Current Proposal	Kishoge North East	118	n/a	Current Proposal
Sub Total Kishoge Catchment		876	758	
SDZ23A/0004	Adamstown Extension	385	395	Granted
Sub Total Adamstown Catchment		385	395	Granted

The Planning Scheme sets out the key principles of the phasing programme including:

- Balanced delivery of infrastructure, urban centres and community services in tandem with population increase in order to ensure sustainable communities and place making is prioritised;
- A logical flexible schedule for development that ensures the coordinated; and
- Incremental development of the lands; and Identification of critical infrastructure with the delivery of such linked to the completion of individual phases.

The Planning Scheme does not specify a commencement location for the construction of residential units for any phase of residential development. The location for commencing development in the Planning Scheme and within Development Areas is flexible. However, apart from exceptional circumstances, when development commences in a Development Area, subsequent permissions and development in the subject Development Area shall be required to integrate with the previous development in a sequential way.

The Phasing Table (Table 4.3) for the Planning Scheme details a schedule and programme to plan and deliver strategic infrastructure and amenities on a phased basis, in tandem with the development of residential units in the Planning Scheme. The phasing programme is based on the premise that the number of dwelling units that may be constructed and occupied in each phase of development is dependent on a predetermined amount of works to provide infrastructure, services, facilities and amenities having been completed to serve each phase.

Table 9.0 Phasing Table and Applicants Response	
Minimum Delivery in Phase	Commentary
Phase 0: Prior to Commencement of Development	
Prior to the commencement of development, strategic district level measures and detailed design shall be prepared by the developer(s) and agreed with South Dublin County Council through a Surface Water Management Plan to implement the prepared Surface Water Strategy.	This has been approved by SDCC

Prior to the commencement of development, a strategic level Parks and Landscape Strategy (incorporating a Biodiversity Management Plan) shall be prepared by the developer(s) and agreed in writing with South Dublin County Council.	This has been approved by SDCC
Prior to the commencement of development, detailed Water and Wastewater plans for the Planning Scheme shall be prepared by the developers and agreed with Irish Water and South Dublin County Council	This has been approved by SDCC
Phase 1A: 0 – 1,000 units constructed and occupied	
Retail Core development in accordance with the Place Making Requirements	Planning permission has been granted for 2,502sqm of retail floorspace within sub sector KUC-S4 which is defined as Kishoge Centre Retail Core
Development shall accord with the Local Level Infrastructure Requirements in relation to agreeing timeline for the opening of Kishoge Train Station & completion of the realignment of Lock Road (R120).	Currently Irish Rail are undertaking renovation works in preparation of opening the station for public use. It is understood that the station is to open this year in 2024 upon completion of works. The Locke Road realignment is only applicable to development within the Adamstown Extension (AE) Development Area.
Provision of Water and Wastewater infrastructure on a pro rata basis in accordance with detailed plans agreed with Irish Water and SDCC.	Clonburris Infrastructure Limited are currently advancing integrated plans for water and wastewater infrastructure as part of delivery of the Link Street. In the interim and until such time as the works are constructed, the proposed development will be serviced by a temporary foul pumping station.
The planning of works for the provision of community floor space and the availability of childcare spaces.	Permitted (SDZ21A/0022) included a creche (534sqm) and community multi-purpose floorspace (74sqm). Permitted (SDZ22A/0018) includes a creche of 609sqm. Permitted (SDZ22A/0010) includes a creche of 599sqm Permitted (SDZ23A/0043) includes a creche of 483sqm and the site wide masterplan provides for the delivery of a community building which will be delivered by Clonburris Infrastructure Limited.
Phase 1B: 1,0001 – 2,000 units constructed and occupied	
Planning permission for appropriate elements of Clonburris Retail Core, including retail provision, employment, residential, community floorspace and urban hub.	It is understood that the owner of the lands, identified as the Clonburris Retail Core, anticipates a planning application for the Retail Core in Q3 2024 / Q1 2025 <sup>1</sup> . It is stated in that the Clonburris Retail Core is not required at this time.
Planning permission for Kishoge Retail Core, including retail provision, employment, community floorspace and residential.	Permitted (SDZ23A/0043) relates to Kishoge Retail Core and provides the required land uses to satisfy this requirement.
Planning and commencement of works at Griffeen Valley Park Extension or Na Cluainte (North and South) in accordance with the	The Strategic Parks and Landscape Strategy has been approved which provides the

<sup>1</sup> See Planning Report attached to file (SDZ23A0043) which confirms the applicant Cairn Homes, owner of the Retail Core lands, will deliver a planning application in the future as per stated timeframe.

prepared and agreed strategic Parks and Landscape Strategy.	framework for the Griffen Valley Park Extension and the Na Cluainte North and South parks.
Agree and make available a school site to the Department of Education (in accordance with requirement of the Department of Education and SDCC).	Planning permission has been granted for a primary school to the Department of Education (SDZ22A/0011), north east of the subject site.
Provision of a minimum 1,000sqm net convenience floorspace and 500sqm net comparison/ retail services floorspace (As part of the Place Making Requirements for delivery of Kishoge)	Permitted (SDZ23A0043) relates to Kishoge Retail Core sub sector KUC-S4 and includes 2,532sqm if retail floorspace.
Provision of a minimum of 500 sqm of community services floorspace (e.g. childcare or health centre) (At Kishoge or Clonburris – subject to location of residential units constructed).	Permitted (SDZ21A/0022) included a creche (534sqm) and community multi-purpose floorspace (74sqm). Permitted (SDZ22A/0018) includes a creche of 609sqm. Permitted (SDZ22A/0010) includes a creche of 599sqm Permitted (SDZ23A0043) includes a creche of 483sqm and the site wide masterplan provides for the delivery of a community building which will be delivered by Clonburris Infrastructure Limited.
Design and planning permission for District Park Hub at Clonburris Little.	The District Park hub is located in Kishoge South East (KSE-S1 and KSE-S2) which is currently subject to pre planning consultation with SDCC and is anticipated to progress to planning application stage in Q2 2024 <sup>2</sup>
Planning and commencement of Link Streets with associated undergrounded services in Development Areas where construction of residential units commences or commenced in Phase 1 (A or B).	The Clonburris Northern Links Street Project is currently at design stage and it is anticipated that planning permission will be sought for the infrastructure works this year.
Provide/demonstrate availability of childcare spaces in the catchment in accordance with Section 2.7.3.	See response to childcare provision in Section 10.5 of this report.
District and catchment level measures from an agreed Surface Water Management Plan to accommodate construction within the subject development areas of construction.	The agreed Surface Water Management Plan for the district and catchment area will be delivered as part of the Link Street works by Clonburris Infrastructure Limited. As per the Planning Scheme it is proposed to attenuate surface water on site, as detailed in Section 5.7 of this report.
Retail Core development in accordance with the Place Making Requirements	Permitted (SDZ23A0043) relates to Kishoge Retail Core and the proposed phasing of that development responds to the Place Making requirements, as detailed in the Planning Report accompanying the application.
Development shall accord with Local Infrastructure Requirements in relation to opening of Kishoge Railway Station.	Currently Irish Rail are undertaking renovation works in preparation of opening the station for public use. It is understood that the station is to open this year in 2024 upon completion of works. The proposed development accommodates a level of park n'ride spaces in proximity to the rail station, located at the south west corner of the subject site.

<sup>2</sup> See Planning Report attached to file (SDZ23A0043) which confirms that a planning application will be delivered in the future as per stated timeframe.

Provision of water and wastewater infrastructure in accordance with detailed plans agreed with Irish Water and SDCC on a pro rata basis.	The proposed solution to the delivery of water and wastewater infrastructure serving the site has been agreed with Uisce Eireann and a Letter of Confirmation is appended to the Engineering Report. The proposed development will connect into the service infrastructure being delivered by Clonburris Infrastructure Limited.
Phase 2: 2,001– 4,000 units constructed and occupied	
Provision of District Park Hub at Clonburris Little.	The District Park hub is located in Kishoge South East (KSE-S1 and KSE-S2) which is currently subject to pre planning consultation with SDCC and is anticipated to progress to planning application stage in Q2 2024 <sup>3</sup>
Completion of Link Streets and associated junctions with associated undergrounded in development areas where residential units are constructed (includes bridges where relevant).	The Clonburris Northern Links Street Project is currently at design stage and it is anticipated that planning permission will be sought for the infrastructure works this year.
Planning and commencement of works to Griffeen or Na Cluainte (alternate option to park commenced in Phase 1B) in accordance with the prepared and agreed strategic Parks and Landscape Strategy.	The Strategic Parks and Landscape Strategy has been approved which provides the framework for the Griffen Valley Park Extension and the Na Cluainte North and South parks.
Completion of works to Park commenced in Phase 1B at Griffeen or Na Cluainte	As above
Agree and make available sites to the Department of Education for Schools (in accordance with requirement of the Department of Education and SDCC).	Planning permission has been granted for a primary school to the Department of Education (SDZ22A/0011), north east of the subject site.
Provide/demonstrate availability of childcare spaces in the catchment in accordance with Section 2.7.3 including the delivery of a minimum of one purpose built facility in Kishoge or Clonburris Urban Centre	See response to childcare provision in Section 10.5 of this report. A total of four creche facilities have already been permitted within the SDZ lands, including the provision of a creche within Kishoge Urban Centre (SDZ23A0043).
Provision of strategic pedestrian/cycle links (including bridges) in development areas where residential units are constructed.	The development proposal incorporates part of the Kildare/Cork railway line green corridor which provides for a strategic pedestrian and cycle route through the SDZ lands.
District and catchment level measures from the Surface Water Management Plan to accommodate construction within the subject development areas.	The agreed Surface Water Management Plan for the district and catchment area will be delivered as part of the Link Street works by Clonburris Infrastructure Limited. As per the Planning Scheme it is proposed to attenuate surface water on site, as detailed in Section 5.7 of this report.
Retail Core development in accordance with the Place Making Requirements.	Permitted (SDZ23A0043) relates to Kishoge Retail Core and the proposed phasing of that development responds to the Place Making requirements, as detailed in the Planning Report accompanying the application.
Provision of Water and Wastewater infrastructure in accordance with detailed plans agreed with Irish Water and SDCC on a pro rata basis.	Clonburris Infrastructure Limited are currently advancing integrated plans for water and wastewater infrastructure as part of delivery of the Link Street. In the interim and until such time as the works are constructed, the proposed development will be serviced by a temporary foul pumping station.

<sup>3</sup> See Planning Report attached to file (SDZ23A0043) which confirms that a planning application will be delivered in the future as per stated timeframe.

## 11.0 CONCLUSION

The proposed development has had regard to the provisions of the South Dublin County Development Plan 2022 – 2028, which seeks to address many issues associated with housing in the county, including housing need, improving social mix and catering for those with particular needs. The proposed development seeks to address and meet some of the critical need for housing within the area, providing much needed accommodation for those on the Housing Waiting List.

The development complies with the SDZ zoning objectives for the land as set out in the Development Plan, *'to provide for strategic development in accordance with approved planning schemes.'* Accordingly, the Clonburris SDZ Planning Scheme contains the relevant development management standards pertaining to the site. The Planning Report demonstrates consistency of the proposed development with the Clonburris SDZ Planning Scheme 2019 and other overarching regional and national policy frameworks pertaining to the area and the proposed development.

The proposed development accommodates a suitable mix of housing, separation distance and car parking together with the quantitative requirements for private and communal open space, all in accordance with the provisions of the Clonburris SDZ Planning Scheme. The overall building form and layout responds to its site and context, whilst facilitating higher density and compact growth all in accordance with the provisions of the Planning Scheme. Paired with high quality architectural design, the development ensures an efficient use of the lands whilst creating a new and attractive place for people to live and visit.

The proposed development is therefore consistent with the provisions of the South Dublin County Development Plan 2022 – 2028; the Clonburris SDZ Planning Scheme and national guidelines, all in accordance with the proper planning and sustainable development of the area.