

Planning Statement

Social Housing Bundle 4, Development at Church of the
Annunciation, Finglas

Dublin City Council

June 2024



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1. INTRODUCTION

1.1 Background

This planning report was prepared by MacCabe Durney Barnes on behalf Dublin City Council, to accompany a Part 8 proposal of 110 no. residential units for 'Older Persons' on a site of circa 0.77 hectares in area, located to the south of Cappagh Road (R103) and to the east the Cardiffsbridge Road (R103), Finglas.

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 178 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out its own development, provided it does not materially contravene the Development Plan.

1.2 Background to the Part 8 Application

The Social Housing Public Private Partnership (PPP) programme consists of the design, construction, financing and maintenance of approximately 1000 homes as part of Social Housing Bundle 4 project bundles of social housing developments on sites around Ireland to be delivered by PPP. The Department of Housing, Local Government and Heritage is the approving authority for the programme with the National Development Finance Agency (NDFA) as financial advisor, procuring authority and project manager.

The current bundle No. 4 includes eight sites, all in the Dublin City Council area. The PPP model of delivery has been selected as an appropriate means of securing the delivery of social housing. Each site includes a mixture of housing typology (for example apartment, duplex, house) and site development works.

The Church of Annunciation site includes apartment units only. The development will be tenanted from Dublin City Council's Housing Lists, in accordance with the scheme of allocations. The proposed development has been designed by the NDFA in consultation with Dublin City Council.

1.3 Structure of the Planning Report

This planning statement was prepared to accompany a part 8 application for the development of 110 residential units for 'older persons' and 434 sqm of community, arts and cultural facilities at a site, c. 0.77 ha located at the site of the former Church of Annunciation, Cardiffsbridge Road, Finglas, Dublin 11.

The report is structured as follows:

- It provides a description of the site and surrounding area, and of the proposed development.
- It outlines how the development complies with:
 - National policy
 - Regional policy; and
 - Local policy.
- It gives an overview of environmental matters, including ecology, environmental impact assessment and appropriate assessment.

2. SITE LOCATION AND CONTEXT

2.1 Site Location

Finglas is located around 5km north west of the City Centre and lies broadly north of the Tolka Valley Park. The area is broadly split into two parts, Finglas East and Finglas West, as it is bisected in a north-south manner by the R135. The site is located in Finglas West, south of Cappagh Road (R103) and to the east of Cariffsbridge Road (R103). The site is located immediately west of Coláiste Eoin and north of Coláiste Íde College of Further Education.

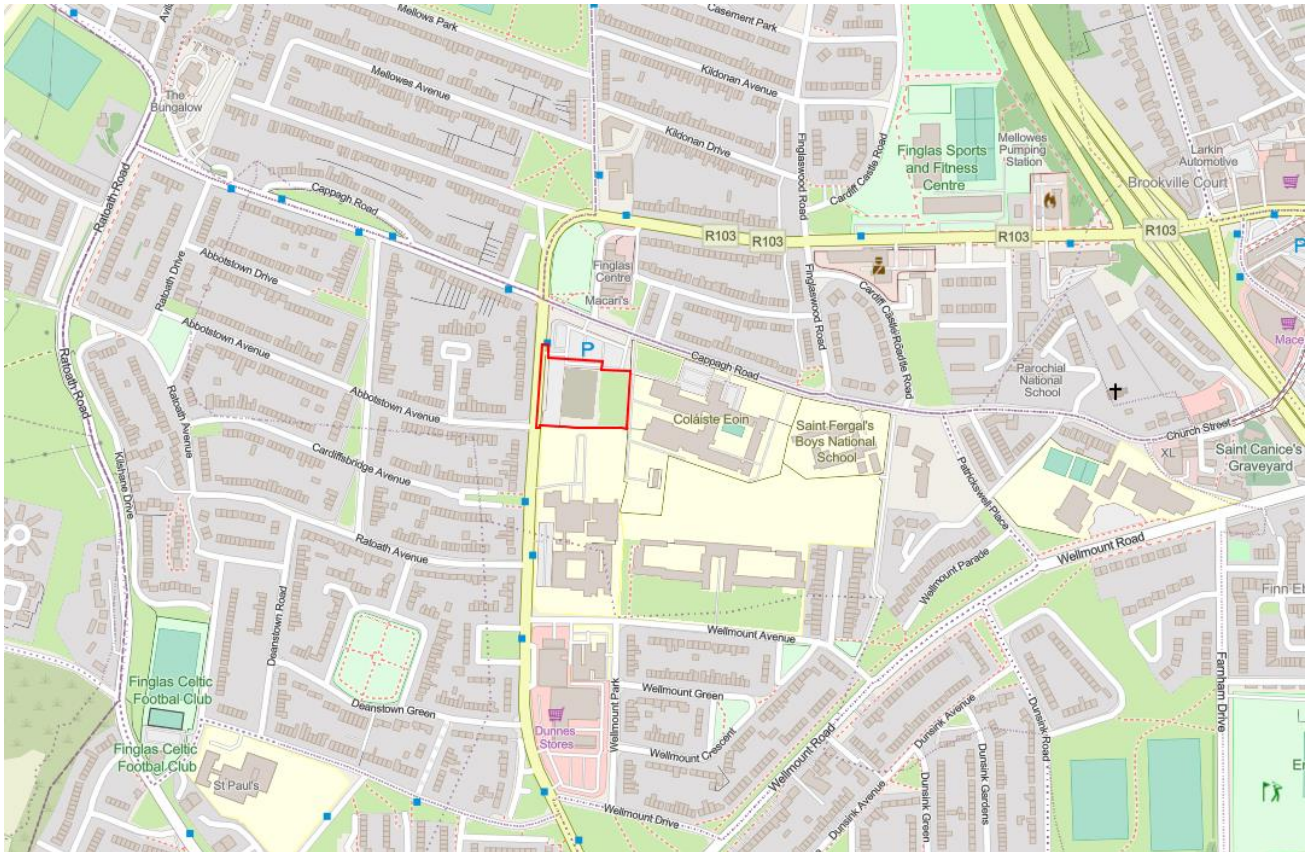


Figure 1: General Location of the site

2.2 Site Description

The site is bound by the permitted new Church of the Annunciation to the north with Cappagh Road further north and to the west by Cariffsbridge Road. It forms part of a formerly institutional enclave which includes four schools (Coláiste Eoin, St Fergal’s Boys National School, St Brigid’s Infant National School and Coláiste Íde, College of Further Education), public open space and sport facilities (indoors and outdoors). The Church of the Annunciation was formally located on the site and has been relocated north of the subject site. The subject site is 0.77 ha (net area 0.71) and its location is illustrated in the figure below. The new Church of the Annunciation will be located immediately north of the subject site. Under PA. Reg. Ref 3023/19, demolition of the existing Church of the Annunciation building (c.3166sqm) and the construction of a new church/ parish pastoral centre building on a smaller site north of the subject site was granted by Dublin City Council in March 2020. The site is currently fenced by hoarding, as the Church has now been demolished.

Directly across Cappagh Road to the north, an open space is bound by a parade of shops which includes a butcher, a takeaway, a pharmacy, a Spar and Tesco Express. Some additional commercial uses (hairdresser and clothes alterations) can be found on the upper floor of some of the units.

Immediately to the east is Coláiste Eoin which includes a series of buildings of up to 2 storeys. The site is separated from the part 8 site by school grounds and an access road, which is closed by a vehicular gate on the Cappagh Road. The closest school buildings are located around 20m away from the boundary separating the sites. South of Coláiste Eoin and generally south-east of the site is a large greenfield site bounded by Fergal's lane. The site is currently closed to public access. Immediately to the south of the Part 8 site is the Leisure-Point Sports Complex. The complex forms part of Colaiste Íde. It includes indoor (gym, basketball etc) and outdoor (7 a-side soccer pitches) sports facilities. The west of Cardiffsbridge Road consists of one and two-storey houses.



Figure 2: Part 8 Application

The site consists of brownfield land and is relatively flat. It was previously used as institutional lands and was home to the Church of Annunciation. It is currently hoarded. The site slopes slightly north to south. There are mature trees located along the western boundary of the site and on part of the southern boundary. The trees are typically 11-19m in height.

2.3 Transportation

The M50 is located within 1km of the subject site and can be accessed via the Finglas Bypass. The site is located c. 6km from the City Centre. The site is served by Cardiffsbridge Road, stop 1585 and Cappagh Road, stop 1576 with Dublin Bus and Goahead Ireland Bus routes serving these stops. Dublin Bus no. 40 and 40E routes travel

along Cardiffsbridge Rd towards the City centre with its terminus at Earslfort Terrace/ Leeson Street. The route also serves travel to Charlestown Shopping centre. Goahead Bus Service Bus no. 220 provides an hourly service between Blanchardstown and DCU Helix. In addition to the current routes servicing the subject site, a number of improved services are earmarked for delivery that are relevant to consider in the context of the proposed development.

2.3.1 Accessibility

A key priority of the Development Plan is to create sustainable neighbourhoods, with a range of households types and tenures located in close proximity to community facilities and services in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. The below map illustrates the walkability of the site to surrounding neighbourhood centres, services and amenities.

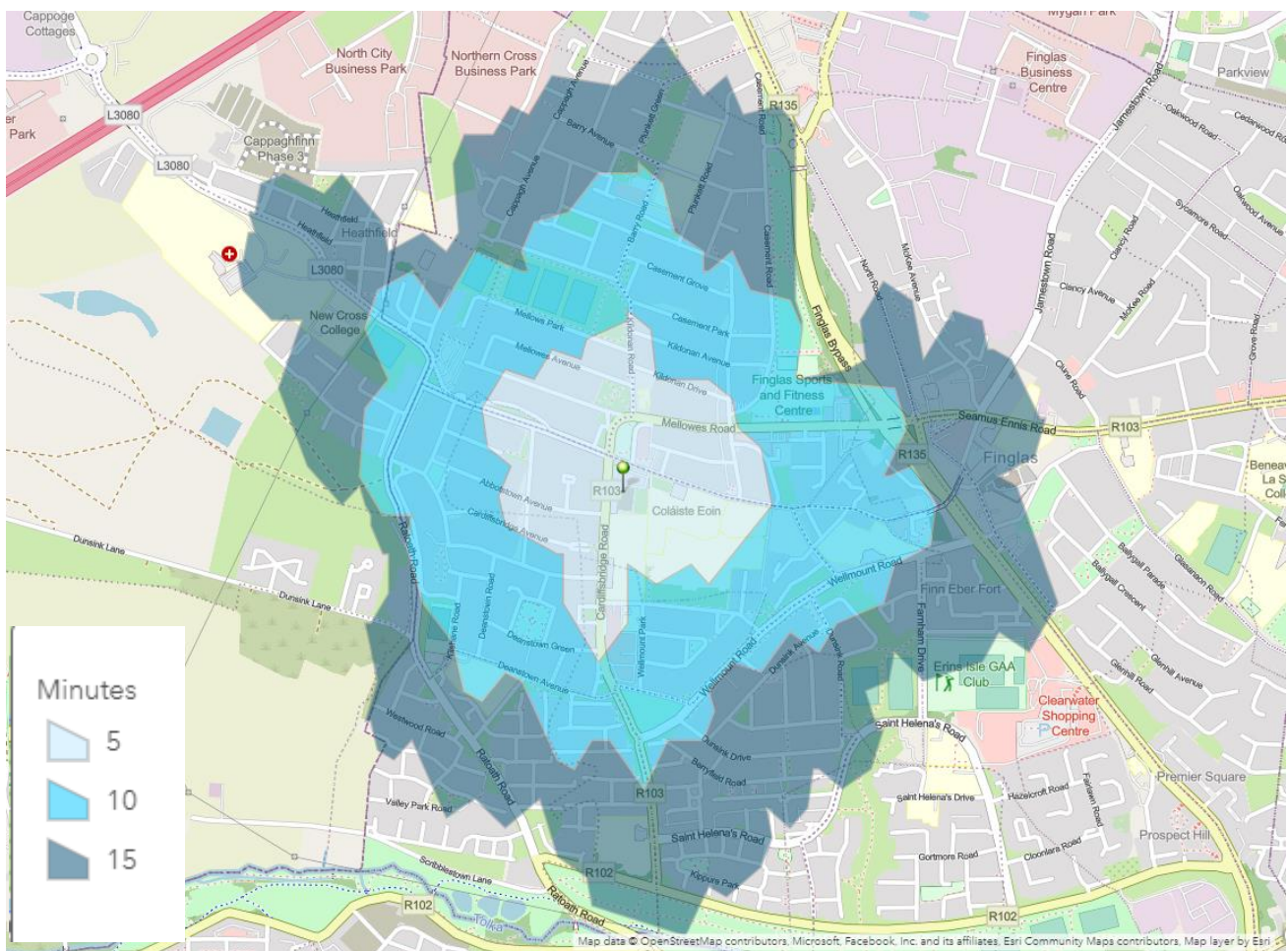


Figure 3: Walkability Patterns in 5,10 and 15 minute intervals (Source: ArcGIS)

2.3.2 BusConnects

The aim of Bus Connects is to enhance bus infrastructure by improving speed, efficiency and reliability along the 16 corridors, while providing enhanced walking and cycling facilities through the provision of dedicate cycle lanes that are separated from traffic as much as possible. The overall objective of the Bus Connects project is to support the development of a sustainable and integrated public transport system in the Dublin Region that enables the delivery of compact urban growth that is sustainable and supports a low carbon future.

The site is located adjacent to the F-Spine serving Finglas-City Centre-Kimmage. The F3 Charlestown-Finglas SW-City Centre-Greenhills is proposed to run along Cardiffsbridge Road. In addition to the F3 route, a local route L62 Blanchardstown- Tyrrelstown- Boombridge is proposed along Cardiffdbridge Road.



Figure 4: Finglas Area BusConnects Map (Source: NTA, 2022)

2.3.3 Luas Finglas

Luas Finglas is the next extension of the Luas Green Line. The proposed route is 3.9 km in length and will include four new stops of St Helena’s, Finglas Village, St. Margaret’s and Charlestown. The route will provide interchange opportunities with bus networks at all the new stops and with mainline rail services at Boombridge. The subject site would be located within c.500 meters of the preferred new stop in Finglas Village as illustrated below.

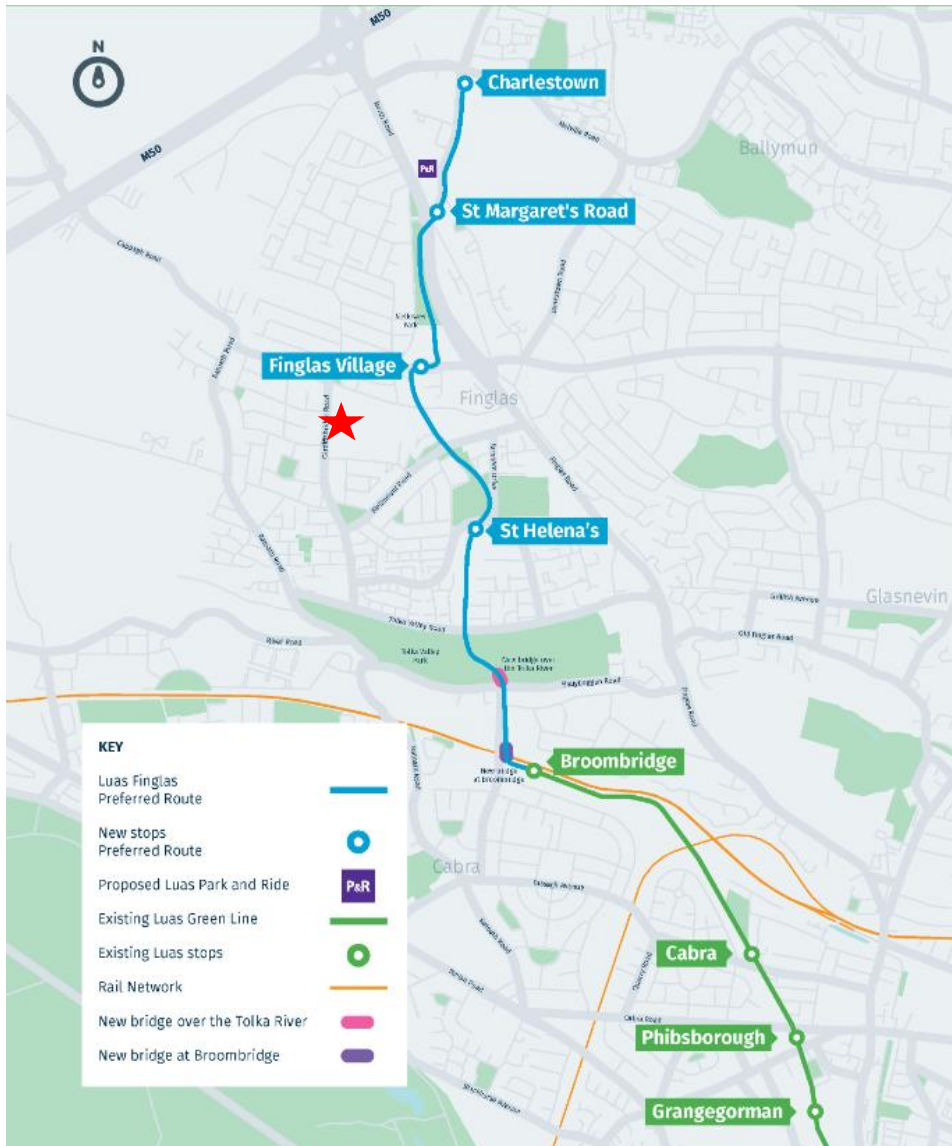


Figure 5: Preferred Luas Green Line Route (Source: TII and NTA, 2023)

2.3.4 Cycling

Improved cycling facilities are proposed as part of the proposed Bus Connects Core Bus Corridor project along Finglas Road, and as part of the Luas Finglas, where a dedicated parallel cycle and walking track is proposed. Along Cappagh Road and Mellowes Road to the north of the site, there is a cycle route proposed between Finglas to Killester and this route is phased for delivery between 2025-2027.

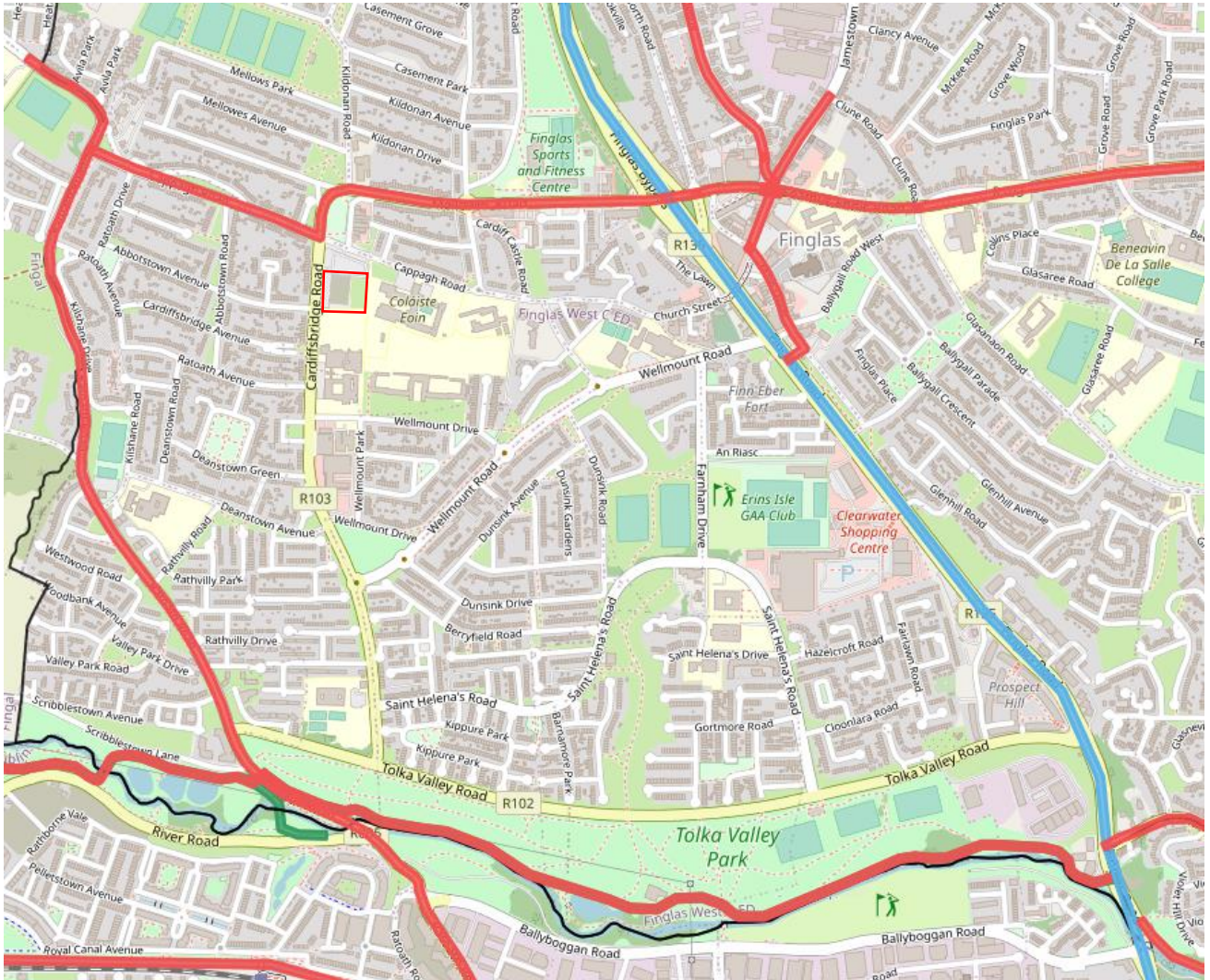


Figure 6: Proposed Cycle Network (Source: DCC)

3. RELEVANT PLANNING HISTORY

3.1 Subject Site

PA.Reg.Ref.3023/19: Planning permission was granted for the demolition of the existing Church of Annunciation building (c. 3,166 sqm) and construction of a new church / pastoral centre on a smaller site of 0.44 ha. Vehicular access is via the Cappagh Road, with pedestrian accesses via both the Cappagh Road and the Cardiffsbridge Road. Decision date: 20/03/2020.

The permitted site plan layout is illustrated below:

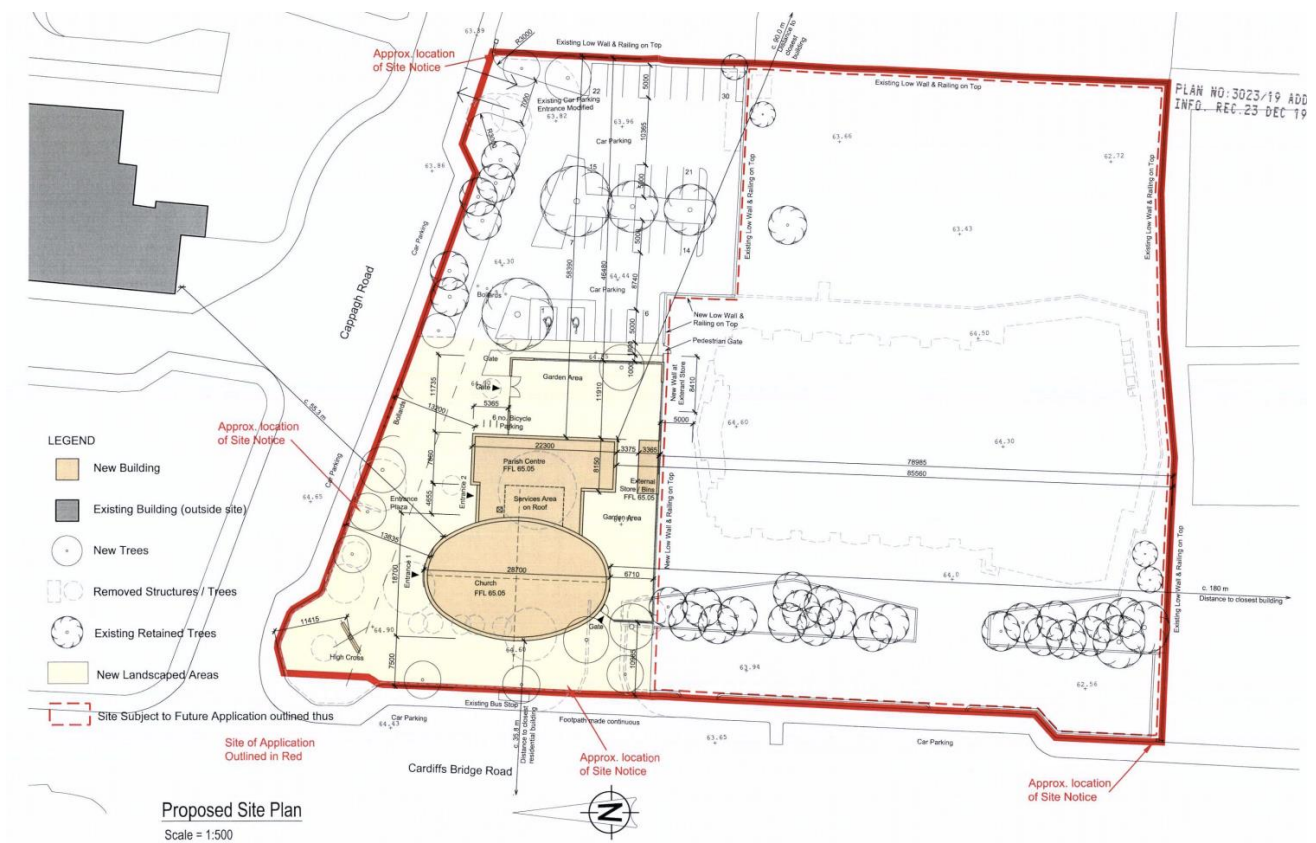


Figure 7: Permitted Site Plan (Source: Walsh Associates as displayed on the DCC planning register)

To the north of the site, a significant 3m high palisade fence boundary is proposed as part of the adjacent planning approval, with a potential pedestrian access to the subject development lands. The permitted south elevation, which interfaces with the subject site is shown below.

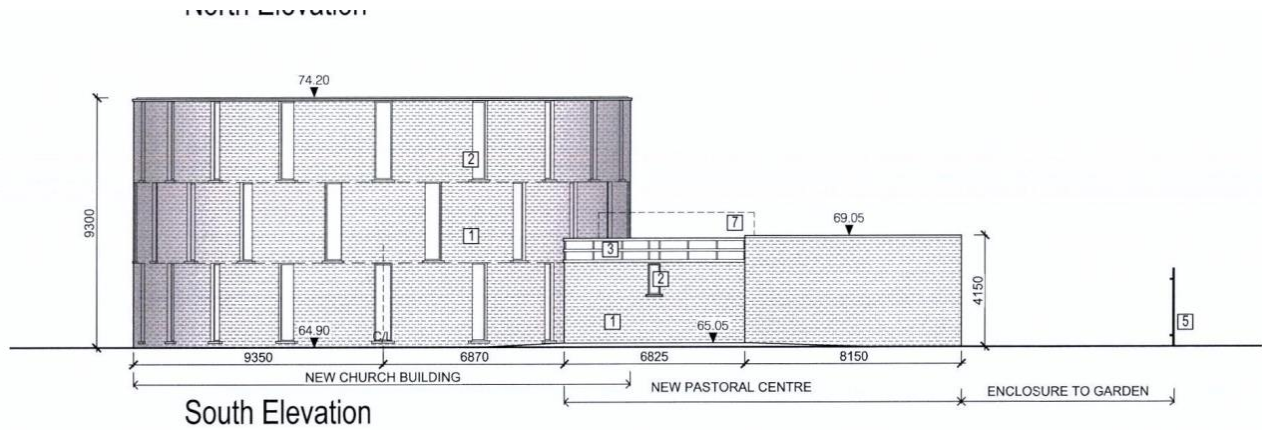


Figure 8: Permitted South Elevation 23 (Source: Walsh Associates as displayed on the DCC planning register)

PA.Reg.Ref. 5350/08: Planning permission was granted for the construction of a parish pastoral community centre to be located to the east of the existing church. The development consists of a three-storey building and includes offices, meeting rooms, stores, toilets, multi-function hall, tearoom, gym, changing facilities and 2 no. priest accommodation units.

3.2 Surrounding Area

PA.Reg.Ref.4795/23: Planning permission was sought for a 2-storey extension to the rear of the existing school building including 3 no. classrooms, 2. No. SET rooms with ancillary accommodation, removal of 2 no. existing pre-fab buildings and all associated site works at the St Fergal’s Boys National School on the Cappagh Road. The application was lodged on the 17th November 2023 and granted permission on 28th February 2024.

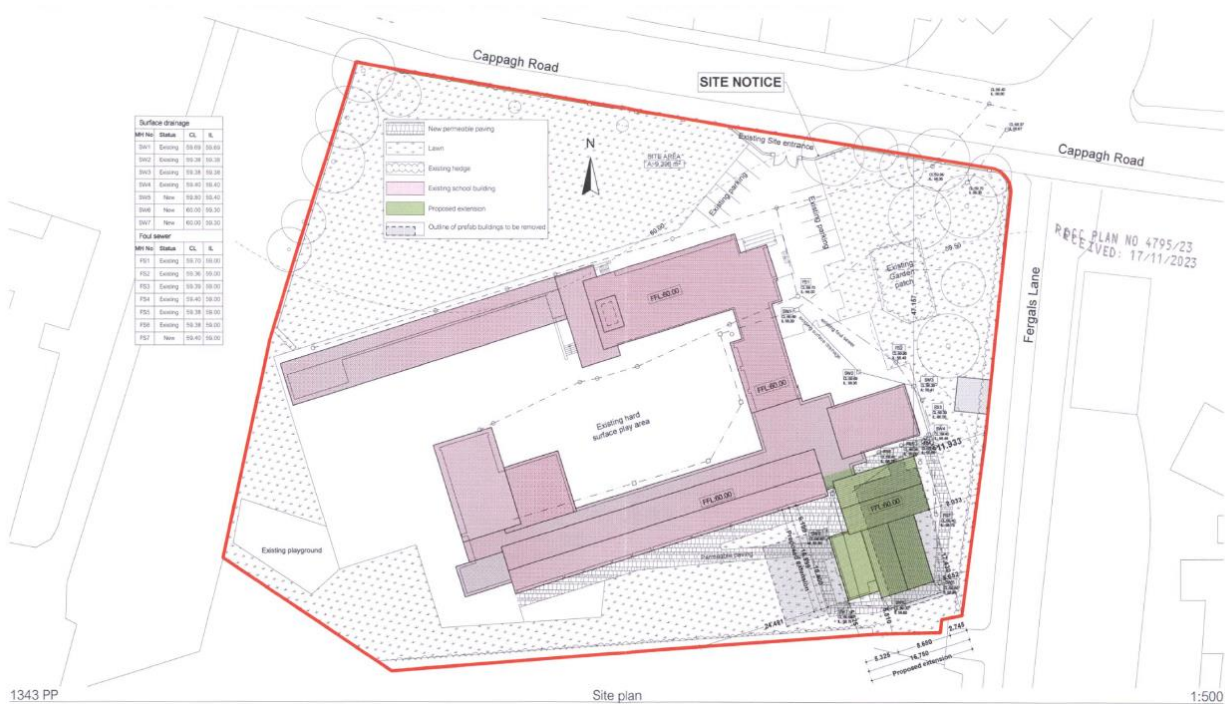


Figure 9: Extract of Site Plan submitted as part of PA.Reg.Ref.4795/23 (Source: McGahon Architects as displayed on the DCC planning register)

ABP.Ref.314610: BusConnect Ballymun/Finglas to City Centre Core Bus Corridor Scheme. The application was made to An Bord Pleanála on the 9th September 2022. An Bord Pleanála granted permission for the application on 12th March 2024.

PA.Reg.Ref. 3608/24: Planning permission is being sought by the HSE for the demolition of 3 no. existing dwellings on site and the construction of a new two-storey mental health unit with ancillary accommodation at no. 9 church street, Finglas, Dublin 11. The application was submitted on 29th April 2024. A decision is due 4th June 2024.

Most the planning history in the area is otherwise dated and would have little to no bearing onto this Part 8 proposal. Notwithstanding this, it is important to note proposed plans by Dublin City Council (DCC), the Health Service Executive (HSE), the City of Dublin Education and Training Board (CDETb) and the Archdiocese of Dublin currently known as 'Fergal's Field Development Project'¹. It is intended that the site would be used for a new primary care centre and new sporting facilities for the CDETb and local schools.

It is envisaged that the primary care centre would include local GP Practices, a primary care team services (nursing, speech and language therapy, physiotherapy, occupational therapy, psychology and dietician services), dental and orthodontic services, community mental health services, child and adolescence mental health services, ophthalmology, disability services and a social inclusion hub.

It would also include space for TUSLA so that it can undertake its social work from the new premises with some additional space for early years and Education Support Services, Adoption, Workforce Learning and Development.

In relation to the sports facilities, it is intended to provide for three floodlit astro-turf pitches, a junior GAA 3G all-weather pitch with a surrounding walking track, replacement car parking spaces and a new covered bike parking. The area will be landscaped with paths and planting. There will be a grass area provided to the schools which may be used for various purposes. Works would be proposed to the façade of the existing Leisure Point building to improve its aspect, with associated refurbishment of the car park.

The feasibility study which sets out the above elements considers that, subject to a detailed masterplanning exercise and relevant planning consent, the overall landbank could be developed as per the figure below.

¹ Fergal's Field Development Project – Information Booklet May 2022:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewjmyPnJi_iCAxXHUEEAHRraDfYQFnoECBEQAQ&url=https%3A%2F%2Fwww.cityofdublincity.ie%2Fmedia%2FFergals-Field-Development-Project.pdf&usq=AOvVaw3mdBOxkXz5bhmG5n14VqfC&opi=89978449

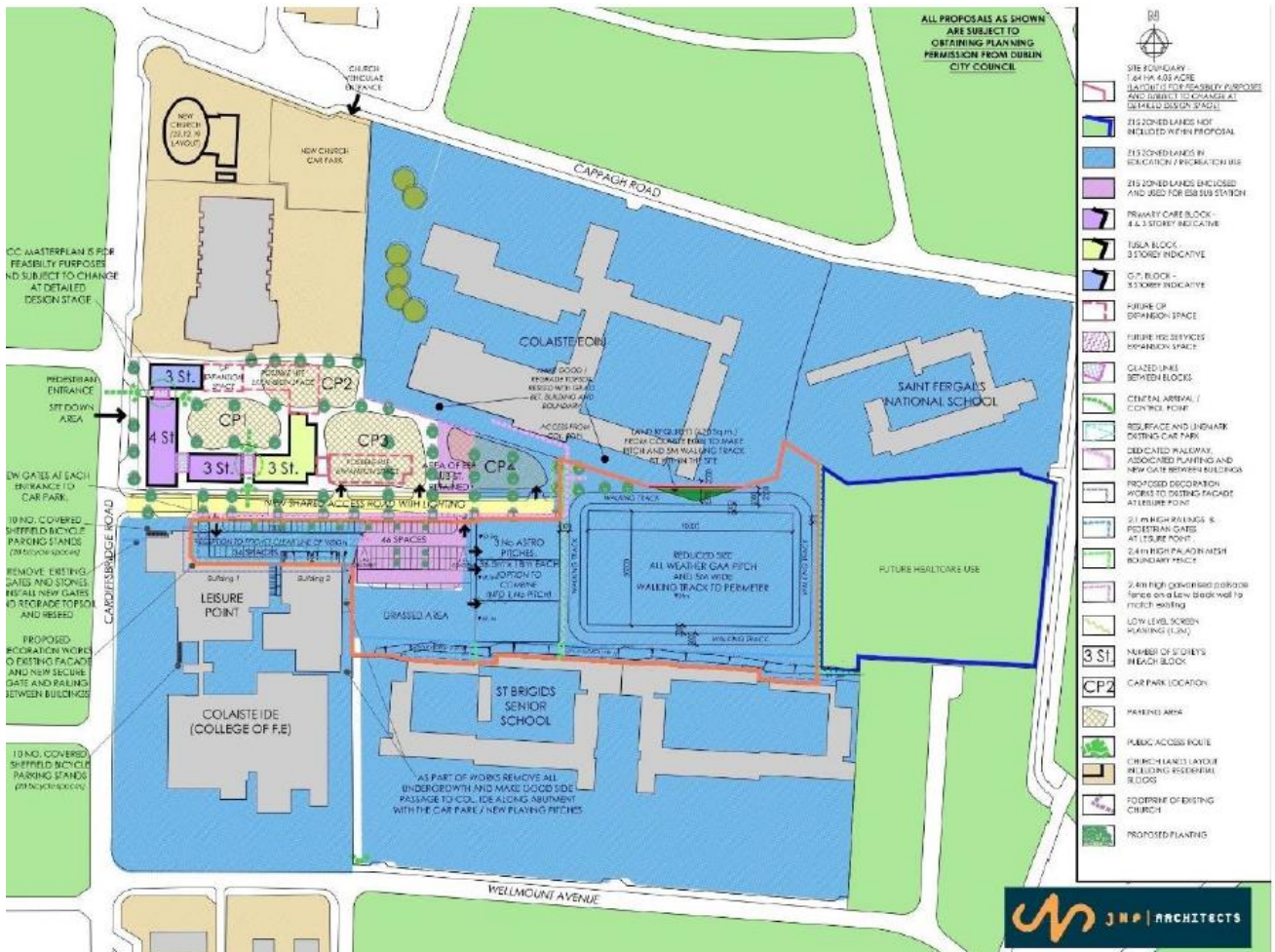


Figure 10: Layout Plan of Final Feasibility of Primary Care Centre and Recreation Facilities (Source: DCC, HSE, CDET, Archdiocese of Dublin)

The aerial image below shows the landbank. Some elements have already been progressed, with land swaps between the Diocese and the HSE and the demolition of the church already undertaken.



Figure 11: Lands subject of the feasibility

4. SITE SELECTION AND CONSIDERATION OF ALTERNATIVES

4.1 Site Selection

The subject land is in the ownership of Dublin City Council and therefore can be efficiently utilised to meet some of the demand for social housing arising in Dublin City and particularly Finglas. Finglas is a well-established residential area with a number of unused and underutilised land banks. Site selection was restricted to consideration of that land in the ownership of the Dublin City Council and which could be adequately serviced and integrated to provide much needed social housing.

The site is located within the boundary of the Strategic Development and Regeneration Area 3 Finglas Village Environs and Jamestown. The SDRA lands are critical to the core strategy of the City Development Plan. All SDRAs have been examined to determine capacity for future housing growth, taking into account sustainable densities. It is considered that these areas are capable of delivering significant quantities of homes and employment for the city. Under Table 2-8 Core Strategy and Settlement Hierarchy, the proposed zoned area is 52 ha with a proposed residential yield of 2,800 units with an estimated population of 5600 persons. In this regard, site selection has taken a plan led approach to development while also having regard to the residential zoning provisions in the Dublin City Development Plan 2022 – 2028 (CDP) as informed by the Finglas Strategy. The Finglas Strategy is a non-statutory high-level study prepared by DCC Planning and Property Development Department to address opportunities for urban regeneration and placemaking in Finglas. The Strategy is a framework for integrated, plan-led solutions, but does not give planning consent for specific projects. The Strategy has been informed by a Baseline Report, which identified the key assets of the area, and was subject to consultation with the elected members. The Strategy was formulated with input of internal DCC Departments. In December 2020, the recommendations of the Strategy were presented to the elected members.

Site selection has taken a plan led approach to development having regard to the residential zoning provisions in the Dublin City Development Plan 2022 – 2028 (CDP), in particular the Finglas Village Environs and Jamestown Lands Strategic Development and Regeneration Area (SDRA) 3 as informed by the Finglas Strategy, which identified the site with potential to provide for older persons housing, the CDP zoned the site Z1 'Sustainable Residential Neighbourhoods' with part of the application site extending towards the Z15 'Community and Social Infrastructure'. The subject site is essentially a brownfield site within an established residential area. Having regard to the above, there are no impediments to proceeding with the site.

The site is located within an established residential neighbourhood, in close proximity to shops and community facilities and several bus stops. It is ideally located to meet the principles of the 15-minute City as envisaged in the Dublin City Development Plan 2022-2028.

4.2 Consideration of Housing Tenure and Type

The provision of social housing units on this site, will facilitate diversity in tenure and facilitate housing mix in the outer western suburb of the city and in an area, that is dominated by private housing.

The Finglas Strategy which fed into the definition of the principles and policies of the Strategic Development and Regeneration Area (SRDA) for Finglas noted that the area had an older population than the rest of Dublin City with 14% of the population over the age of 65.51% of households are made up of 1 and 2 persons

households. Compounded with ageing population nationally, the Council notes the increasing need to provide for the housing needs of older persons.

Considering the Dublin City Housing Waiting List for area E, the Council includes 14 persons in band 1 housing 'homeless priority older person' (the highest priority), 62 in band 2 and a further 138 in band 3.

The housing stock owned by DCC in the area is currently not reflective of the population composition. The Council principally owned 3-bed units (55.7%) and 2-bed units (23.3%). Comparatively, only 11.7% of the stock consists of single-bed units. In this regard, the development would make positive contribution to the diversification of the housing stock.

In relation to tenure, the housing stock as a whole, is composed of 64% of owner-occupiers (with and without mortgages). Only 17% of the stock is rented from the local authority and a further 1% from a voluntary body. While the proposed development will not single handily redress the balance, it will merely increase the share of public housing from 16.8% to 17.6% in the area. If other concurrent part 8 applications under Social Housing Bundle 4 in the area, specifically at the Wellmount Road, are to be considered, then this percentage rises to 18.2%. Given this means, that the overall share of Local Authority rented housing is still relatively low compared to other private tenures, this should be viewed as acceptable.

The proposed development must be considered appropriate to the area providing for balanced and integrated housing tenure in this area of Dublin City.

4.3 Consultation

A public consultation event was held on 28th November 2023 in respect of the proposed development at the former Church of Annunciation site in Finglas. The consultation event included members of the public, representatives of Dublin City Council and members of the Design Team for the development of the site. It should be noted that the overall proposal was positively received by local residents in attendance at the event. In summary, the following feedback and queries were noted which will be addressed in this report.

- Residents were concerned with the overlooking and overshadowing of the houses to the west of the site.
- Queries were raised regarding the delivery of the new church on the adjoining lands to the subject site and what were the plans for same.
- The issue of car parking was raised.
- The residents queried whether this site was dedicated solely for senior citizens.

In response to the issues raised by members of the public in respect of the proposed development, it is noted that a Sunlight and Daylight assessment has been prepared by Digital Dimensions and accompanies this application, which includes analysis of any potential overshadowing that would arise following the construction of the proposed development. The daylight and sunlight modelling indicates that any impact on adjoining properties is within permissible levels.

In regard to the proposal for the new Church on the adjoining lands. Planning permission was granted under PA.Reg.Ref.3023/19 for the demolition of the existing Church of Annunciation building (c. 3,166 sqm) and construction of a new church / pastoral centre on a smaller site of 0.44 ha. Vehicular access is via the Cappagh Road, with pedestrian accesses via both the Cappagh Road and the Cardiffsbridge Road. Decision date: 20/03/2020. Works under this application have commenced and demolition works completed.

Having regard to the nature of development, which will accommodate senior citizens it is considered that the development will give rise to limited car parking requirements. Owing to the sites proximity to existing and planned high frequency public transport and the infill nature of the site, the parking ratio is proposed as 0.14 per unit. This equated to a total no. 15 spaces at the site which includes 2 no. Part M parking spaces and 1 no. motorcycle space. It is considered that the number of spaces proposed will meet the demand generated from the proposed development.

The proposed scheme has been designed to accommodate senior citizens. This decision is based on supporting evidence derived from DCC housing waiting lists which indicate a strong demand for this typology at this location as demonstrated in section 4.2 of this report.

5. 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. The aim has been to retain as many natural features on site as possible, with particular regard to the trees along the western and southern site boundaries. Incorporation of these features has influenced the overall design approach, particularly informing the location of the public open space. The proposed design is as envisaged under the SDRA Guiding Principles diagram, which sought to achieve active frontage along Cardiffsbridge Road.

The client requirement and project brief was to accommodate approx. 100 no. units on the site. Following consideration of the design approach and having regard to relevant standards and development policies in the Dublin City Development Plan, an additional 10 no. units were accommodated on the site. The Architectural Design Statement provides an overview of 3 alternatives considered for the site. The units proposed to accommodate 'Older Persons' housing need in the area is generally as per the original client requirements. The proposed density makes the most efficient use of zoned, urban land whilst also seeking to integrate with and consolidate existing and planned development in the area.

6. PROPOSED DEVELOPMENT

6.1 Project Description as per public notices

The proposed development is described as follows in the public notices.

Notice is hereby given of the construction of 110 residential units for ‘Older Persons’ at a site c.0.77 ha at the site of the former Church of Annunciation on Cardiffsbridge Road, Finglas, Dublin 11, which will consist of the following:

- One apartment block ranging from 4 to 5-storeys, containing:
 - 110 residential units for ‘Older Persons’ comprising 106 no. 1-bed and 4 no. 2-bed; and
 - 434 sq.m. of community, arts and cultural facilities.
- 15 no. car parking spaces and 87 no. cycle spaces.
- 935 sq.m. of public open space and 609 sq.m. of communal open space.
- One vehicular and pedestrian access and one dedicated pedestrian access off Cardiffsbridge Road.
- Boundary treatments, public lighting, site drainage works, internal road surfacing and footpath, ESB meter rooms, plant rooms, stores, bin and bicycle storage, landscaping; and
- All ancillary site services and development works above and below ground.



Figure 12: Proposed site layout (source: Seàn Harrington Architects)

In summary, the proposed development has been designed to provide high quality homes for senior citizens. The design of the scheme steps down from five to four storey. It will provide a net density of 154 uph on a

brownfield site fronting Cardiffsbridge Road using a net area of 0.71 ha. The perimeter block is arranged around a courtyard communal open space.

6.2 Detailed Description

A detailed description of the proposed development is outlined in this section.

Table 1: Proposal Details

Development Parameters	Summary
Parameter Site Proposal	Gross site area: 0.77 ha Net site area: 0.71 ha
No. of Residential Units (Apartments)	110 units
Non-residential uses:	434 sq.m. of community, arts and cultural facilities.
Density	Net density: 154 uph
Plot Ratio	1.30
Site Coverage	27.7%
Dual Aspect	67%
Car Parking Overall	15 spaces
Bicycle Parking	87 spaces
Height	4-5 storeys
Public Open Space	935 sq.m
Communal Open Space	609 sq.m

The breakdown of the overall residential unit types is as follows:

Table 2: Overall Breakdown of Units

Unit Type	1 bed Apartment	2 bed Apartment	Total
No. of units	106	4	110
% of Apartments	96%	4%	100%

6.3 Design Rationale

The Seàn Harrington Architects Architectural Design Statement provides details of the design rationale. In summary, the proposal is for a residential scheme for Older Persons based on housing need, with community,

arts and cultural facilities also proposed as per CUO25 of the Development Plan. The community space is located at ground floor level, overlooking the proposed public open space, and addressing Cardiffsbridge Road with residential apartments above ground floor level. The proposed public open space and community spaces will also serve the wider community, so it is therefore ideally located and readily accessible to the wider public. A single communal open space is provided within the internal courtyard, clearly defined by the 4 sides of the perimeter building.

At ground floor, own door apartments are along the north, south and east sides of the buildings. All apartments feature a private curtilage to the street facing side, and a private terrace for amenity on the courtyard.

The site layout reflects the aspirations of the Finglas Strategy and the SDRA guiding principles for the site. The guiding principles indicate that the potential for future permeability to the east and south of the proposed site, serving Fergal's Field southeast of the site.

The SDRA requires for a density in excess of 100 uph which will result in a significantly more dense development than that of adjacent housing (c.30 uph). This results in increased scale and density at the site, which presents an opportunity for variety in building height as an important component in achieving a sense of place, creating an attractive built environment and protecting residential amenity. While the proposed development is of an increased scale and density to adjacent low rise, 2 storey housing, the proposed scheme is set back from Cardiffsbridge Road, behind the line of existing mature trees., which results in c.50m buffer between the proposed apartment building and existing houses along Cardiffsbridge Road.

7. PLANNING POLICY

7.1 National Policy

7.1.1 National Planning Framework

The National Planning Framework (NPF) guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development. The National Strategic Outcomes are expressed as follows:

1. Compact Growth
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenities and Heritage
8. Transition to a Low Carbon and Climate Resilient Society
9. Sustainable Management of Water, Waste and other Environmental Resources
10. Access to Quality Childcare, Education and Health Services

The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work.

National Policy Objective (NPO) 3a of the NPF states that it is a national policy objective to "*deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements*". The application site is located in built-up envelope of Dublin City.

National Policy Objective 3b 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.*" The proposed development accords with objective (3a and 3b) in the provision of new social homes within an urban context.

National Policy Objective 4 states "*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 accords with this objective and provides a defined strong urban frontage on Cardiffsbridge Road. The proposed layout caters for communal and public open space. It includes 434 sqm of community space which will serve both prospective and existing residents to allow for the creation a cohesive community in the development.

National Policy Objective 33 seeks to "*Prioritise provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*".

Given the range of community facilities and plans for the adjacent landbank, combined with good public transport facilities and convenience retail in close proximity, the provision of 110 homes at the location is adequate.

National Policy Objective 34 aims to *“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time”*.

The proposed development accords with this policy and the scheme provides homes for senior citizens. All units have been designed to be adaptable to suit the changing needs of residents. It is important to note that 33% of the units are universally designed.

National Policy Objective 35 aims to *“Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or self-based regeneration and increased building heights.”*

The proposed development accords with this policy in the adaptation of a brownfield site for residential use at an increased density.

In summary, the proposed development is on zoned lands close to shops, community, high quality public transport and shops in Dublin City and meets the NPF objectives.

7.1.2 Climate Action Plan 2024

The Climate Action Plan 2024 is the roadmap to deliver on Ireland’s climate ambition. It takes account of the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed in 2022. The plan reiterates the targets set out under the Climate Action and Low Carbon Development (Amendment) Act 2021 which seeks a reduction of 51% on GHG emissions by 2030 compared to 2018 levels and to achieve climate neutrality by 2050.

In relation to the decarbonisation of housing, the plan identifies Key Performance Indicators (KPI) and abatements, the former serving as a key metric. The following themes and associated KPIs are relevant:

Theme	2025 KPI	2025 abatement (vs 2018 MtCO ₂ eq)	2030 KPI	2030 abatement (vs 2018 MtCO ₂ eq)	2031-2035
Standards and Regulations	All new dwellings designed and constructed to NZEB standard. 170,000 new dwellings using a heat pump.	0.3	All new dwellings designed and constructed to NZEB standard. 280,000 new dwellings using a heat pump.	0.4	Minimum Energy Performance Standards for all dwellings

All units provided will be to the appropriate standards. Please refer to Climate Action Energy Statement, Sustainability & Part L Report accompanying this application.

In addition, the plan considers the recommendations of the Climate Change Advisory Council which particularly note the need to shift away from car dependency through the consideration of land use and housing policy. It also considers the need to colocation or proximity with transport.

The proposed development will help to achieve the targets set by the Climate Action Plan 2024 in the following ways:

- The provision of medium residential density and in accordance with the NPF providing for compact growth.
- The proposed development provides a medium density residential development in close proximity to existing community facilities and amenities.
- The application site is within walking and cycling distance to bus and proposed Finglas Luas station and BusConnects route. The provision of additional residential and community uses in this location will support the existing public transport serving the area and will make the provision of further public transport options (such as increased frequency of services) viable.
- Bicycle parking storage has been provided.

The proposed development therefore accords with the Climate Action Plan 2024.

7.2 Ministerial Guidelines

A number of national planning guidelines may be considered.

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities (2007)
- 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 Street (2019)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018)
- Design Manual for Quality Housing (2022)

7.2.1 Guidelines for Planning Authorities on Childcare Facilities (2001)

It is noted that these are a planning guidance document only, and standards set down in relevant childcare legislation take precedence.

Section 2.4 of the Guidelines addresses appropriate locations for childcare facilities and considers that one childcare facility for every 75 units is generally appropriate. The Guidelines require the provision of childcare facilities at a ratio of 20 childcare spaces for every 75 proposed dwellings.

The provision of 110 dwelling units, 106 of which are one-bed units. Having regard to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, one bedroom apartment units should not generally be considered to contribute to a requirement for childcare provision (and subject to location this may also apply in part or in whole to two bedroom). Excluding one-bedroom units, 4 units may generally require childcare in the proposed development. However, it is noted that the entirety of the development is to be proposed to be tenanted to senior citizens.

The Dublin Childcare Committee was consulted which identified childcare providers within a 1 km radius. Given the proposed development accommodating senior citizens it is considered that the provision of a creche on the Part 8 site would not be required.

7.2.2 Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities (2007)

Chapter 4 indicates that in the planning and design of the scheme, the architect should:

- Seek to create a high-quality living environment for residents and enhance the social, environmental and visual quality of the area as a whole;
- Seek to ensure a high level of safety and security for the residents through causal surveillance and overlooking;
- Maximise amenity and energy efficiency by climate sensitive design;
- Eliminate barriers to accessibility for all users - particularly older people and those with mobility impairment or other disability;
- Seek to ensure that the scheme can be constructed, managed and maintained at reasonable cost and in a way that is economically, socially and environmentally sustainable;
- Design public open space so as to maximize its potential benefit to the resident through clear definition of public, communal private open space;
- Permeability as the means to achieve a high quality living environment.

A Design Statement accompanies the Part 8 documentation. The environmental and visual quality of the area as a whole will be enhanced significantly by the development of a vacant site. The site is currently underused, but does incorporate a stand of trees onto Cardiffsbridge Road. The area specifically earmarked for public open space will enhance the biodiversity value of the site and provide a high-quality landscape.

The proposed development has been designed to be cognisant of adjoining heights and architectural styles. All streets and areas of open space proposed as part of the proposed development will be overlooked, thereby supporting passive surveillance.

All units have been designed to meet the highest level of energy efficiency. The units will be constructed to the highest degree of air tightness to a maximum possible value of 3 m³/m²/hr. The development will use energy efficient technologies to reduce its reliance on fuel and electricity demand. 36 of the 110 apartments are single aspect. The proposed development underwent a daylight and sunlight assessment to ensure that appropriate levels of daylight and sunlight are provided to the units. Owing to the nature of the prospective residents, the development has been designed to be highly accessible, to allow for the mobility needs of older persons and other persons with mobility impairments.

The proposed development will be delivered as part of a PPP. As outlined in the Building Lifecycle Report accompanying this Part 8, the appointed PPP company will deliver, maintain and manage the development. At planning stage *'consideration has been given to the external materials to buildings, boundaries, and the public realm, and also outline energy carbon reduction strategies. The materials and services proposed will be durable, and will provide a long life and low maintenance requirements for the residents.'*

All areas of open space, whether communal or public, have been designed to ensure their maximum use by residents. The internal courtyard is clearly defined and separated from the private open space of units located at ground floor in the main apartment blocks.

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

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities which in turn replaced the Residential Density Guidelines issued in 1999. There is a focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

Table 3.1 – sets out Areas and Density Ranges Dublin and Cork City and Suburbs. It is a policy and objective of the Guidelines that residential densities in the range;

- 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork.
- 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.
- 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations.

The subject site is located within a SDRA, which aligns with the criteria of strategic and sustainable development locations defined under the category of City – Urban Neighbourhoods, where density shall generally range between 50-250 dph.

Policy and Objective 3.1

It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

With a Net Residential Density of 154 dph in an urban neighbourhood, the proposed development is in accordance with the Guidelines.

Policy and Objective 4.1

It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.

The principles, approaches and standards of DMURS have been an integral part of the design process. Section 4.4 outlines general aims of sustainable residential development, including the need to prioritise walking, cycling and public transport over the use of cars, and to provide residents with quality of life in terms of amenity, safety and convenience.

Policy and Objective 4.2

It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.

Chapter 4.4 identifies the core principles of Quality Urban design and Placemaking, including Sustainable and Efficient Movement, Mix and Distribution of Uses, Green and Blue Infrastructure and Responsive Built Form that are required when creating places of high quality and distinct identity. Appendix D sets out a ‘Design Checklist’ which should be incorporated in new residential development as follows.

A Design Statement responding to the 4 criteria above has been prepared and accompanies the documentation. The response to the criteria is summarised below.

Table 3: Summary of Design Statement Response to the Specific Criteria

No.	Topic	Response
1	Sustainable and Efficient Movement	
(i)	permeable and legible network of streets and spaces within the site	<p>The development proposes a high-quality urban infill scheme on a key brownfield site. Whilst there is permeability proposed through what is currently a landlocked site, the SDRA notes that there may be a requirement for access and permeability to the east and south of the proposed site, to serve the future development of Fergal's Field. The current proposal allows for this possible eventuality.</p> <p>The site avails of good public transport connectivity, with Dublin Bus stops on Cardiffsbridge Road immediately adjacent.</p>
(ii)	connections with and between established communities, services and other uses	<p>The site fronts Cardiffsbridge Road, a primary thoroughfare serving Finglas West. To the north along Cardiffsbridge Road is a neighbourhood centre, with local shops and facilities (c. 0.2km away). A larger supermarket and local amenities are located c. 0.6km further south along the same road. The urban village centre of Finglas (East) is approximately 1km to the east.</p> <p>Although the site is landlocked on three sides, a pedestrian link is proposed between the subject development and the proposed new church to the north (PA. Reg. Ref 3023/19: Demolition of the existing Church of the Annunciation building and construction of a new church/parish pastoral centre building on a smaller site).</p>
(iii)	streets designed in accordance with DMURS	<p>In line with National Policy, the development objectives for the proposed site is to provide for higher-density infill development, in an urban location with good transport links. This helps to fulfil one of the primary objectives of DMURs, which is to encourage more sustainable travel, with pedestrians at the top of the user hierarchy, then cyclists, public transport and finally, private vehicles.</p>

No.	Topic	Response
		<p>As the site is an infill development, there are no vehicular through routes. Vehicular access to the site is therefore for carparking and service vehicles only, and this is restricted to the north west corner of the site.</p> <p>The majority of the site therefore is restricted to pedestrians. Footways lead from the public pavement on Cardiffsbridge Road, through and around the proposed public open space to the entrance to the primary stair cores, serving upper floor apartments. A perimeter footway wraps the north, east and southern edges of the building, to provide access to ground floor apartments. Footways are minimum 1.8m wide, with good public lighting, with flush surface finishes, and at maximum falls of 1 in 20, to provide access for all.</p>
(iv)	quantum of parking been minimised	<p>The site is located within parking zone 2 (DCC DP) due to its location along key transport routes. Based on the objective to deliver older persons housing at this site the maximum car parking standards are 1 per 2 dwellings (0.5 spaces/ dwelling). However, for the proposed development, with an analysis of particular need and on account of close proximity to public transport, a car parking ration of 0.14 is proposed. Further clarification here is presented in the Traffic Mobility Management Plan that accompanies this planning application.</p> <p>Parking in this scheme is provided in a modest surface level carpark to the north west corner of the site. The parking area benefits from a high degree of passive surveillance, both from the adjacent road and from the proposed building. Although the carpark area is modest, it features a combination of existing mature trees and proposed soft landscaping, all of which serve to minimise its visual impact. Pedestrian and cycle access to all residences is possible through the public open space, independent of the car park area.</p>
2	Mix of Land Uses (Vibrant Centres and Communities)	
(i)	mix and intensity of land uses appropriate to the site	<p>The primary brief for this site is derived from the DCCDP, and the SDRA mapping for Finglas West. This expressly identifies that the site is to be used for Older Persons, due to the known requirement for such accommodation within the locality. The DCCDP also indicates that the density of a SDRA should range from 100-250 uph.</p> <p>The subject proposal is therefore deemed appropriate, as it meets the requirements of the SDRA.</p>
(ii)	diverse and varied range of housing types	<p>The proposed development is housing for Older Persons. Generally, such housing is for tenants that do not need a high level of support, and who can live independent lives. The proposed delivery of such is based on Housing Needs Demand Assessment of the wider Finglas area. The long term intent is that the occupation of the proposed development with Older Persons will free up currently underutilised family 2&3 bed homes within the wider locality.</p> <p>However, as the building is a development of majority one-bed apartments, all residences are single level, with full level access (by means of lifts to upper floors). This ensures that an existing user who develops mobility issues will not be restricted from accessing areas of their own home.</p>

No.	Topic	Response
		<p>Furthermore, in compliance with DCCDP, in excess of 25% of the apartments have been designed in accordance with Universal Design Principles. The proposed development includes the provision of 33% of universal design units.</p>
(iii)	<p>support the regeneration and revitalisation of an existing centre or neighbourhood</p>	<p>The subject development is regenerative for the wider community, in that it utilises a current brownfield site, and serves to provide housing led, in-demand facilities.</p> <p>The development of the subject site effectively stimulates the development of the wider community, in that every new apartment occupied has the potential to free up a currently underutilised family 2&3 bed homes within the wider locality. These homes will then be made available to families with housing need.</p> <p>The subject development is also one project in a proposed ribbon of development along Cardiffsbridge Road, which will include a new church and a proposed primary care centre, all of which will serve to revitalise the community.</p>
(iv)	<p>enhancement of the public realm</p>	<p>The proposed development will revitalise a current brownfield site, and provide public access to the site again, which at present is inaccessible. The main public realm contribution will be the provision of the new public open space for the benefit of the wider community. This is located at the western site boundary, along Cardiffsbridge Road, a location that allows the POS to be accessible to both the proposed new resident, and the wider existing community. The public open space benefits from existing mature trees, in addition to the proposed new interventions.</p> <p>In addition, the proposed development will bring some improvement to the streetscape along Cardiffsbridge Road, in the form of new railings, tree planting, and improvements to pavements and carparking. The development also allows for the provision of greater permeability of the site in the longer term, as and if required for the development of Fergal's Field to the south east.</p>
3	Green and Blue Infrastructure (Open Space, Landscape and Heritage)	
(i)	<p>positively responded to natural features & landscape character</p>	<p>The Finglas West community was developed from the 1950s onwards, in part to provide new housing for inner city residents. Built on former agricultural lands, Finglas West formed part of the suburban expansion of Dublin City. The predominant building typology in Finglas West are mid-twentieth century 2-storey dwellings. These are typical of those built throughout Dublin at that time, and are not particularly distinctive. As a result of this pattern of development, there are very few protected structures of architectural significance within the wider Finglas area.</p> <p>The proposed development site forms a ribbon of proposed new development along Cardiffsbridge Road, which serves to bring alternative uses and a new building scale. The main site feature is an existing belt of mature trees, running parallel with, and set some 20m back from the edge of Cardiffsbridge Road. In order to facilitate the proposed development, and to achieve acceptable level of daylight and sunlight provision, a number of the existing trees are to be removed or pruned back. An analysis of trees to be removed has been conducted between the architect, daylight</p>

No.	Topic	Response
		<p>consultant and arborist, to achieve an optimal balance of acceptable daylight levels and biodiversity retention. Poor tree specimens have been selected for removal first, and better quality examples only where absolutely necessary.</p> <p>Otherwise, a strategy for biodiversity improvement is proposed, proposals for which have been developed by the wider design team, with particular input from our consultant arborist, ecologist and landscape architect. The subject development proposes a net biodiversity gain.</p>
(ii)	<p>a complementary and interconnected range of open spaces, corridors and planted/landscaped areas</p>	<p>A minimum provision of 10% public open space (POS) is required, as per the zoning objectives for the site. The starting point of the design process has been to identify the most suitable (POS) location, which we propose is at the western site boundary, along Cardiffsbridge Road. This allows the POS to be accessible to both the proposed new resident, and the wider existing community. Its arrangement also allows good passive surveillance from both the existing and proposed dwellings and apartments, and pass traffic on Cardiffsbridge Road that overlook the space. The POS also benefits from existing mature trees, in addition to the proposed new interventions.</p> <p>A single communal open space is provided within the internal courtyard, clearly defined by the 4 sides of the perimeter building. Deck access to upper level apartments overlook the courtyard from upper levels. This helps to ensure that the communal courtyard is an engaging space, that all residents pass through or overlook in the course of a day. The proposed arrangement also ensures that the communal space is clearly defined and secure, with access only possible for residents or invited guests. Communal amenities, such as bin and cycle storage are accessible from the courtyard. A mix of uses are proposed within the communal open space, and further details can be found within the landscape proposals as included separately within this planning application.</p>
(iii)	<p>public open spaces universally accessible and designed to cater for a range of active and passive recreational uses</p>	<p>The proposed development will revitalise a current brownfield site, and provide public access to the site again, which at present is inaccessible. The main public realm contribution will be the provision of the new public open space for the benefit of the wider community.</p> <p>In addition, the proposed development will bring some improvement to the streetscape along Cardiffsbridge Road, in the form of new railings, tree planting, and improvements to pavements and carparking. The development also allows for the provision of greater permeability of the site in the longer term, as and if required for the development of Fergal's Field to the south east.</p>
(iv)	<p>integrated nature-based solutions for the management of urban drainage</p>	<p>A coordinated approach within the landscape design has been taken for water management, with the provision of permeable surfaces and build-ups throughout the scheme. The proposed SuDS measures at the site include green roofs, blue roofs and permeable paving.</p>
4	Responsive Built Form	
(i)	<p>coherent and legible urban structure in terms of block layouts and building heights</p>	<p>The SDR requirements for a density in excess of 100 uph will result in a significantly more dense development than that of adjacent housing (at c. 30uph). This will in turn result in a proposed building of increased scale and density. This should be seen as an opportunity, as variety in building height</p>

No.	Topic	Response
		<p>is an important component in helping to achieve a sense of place, create an attractive built environment and protect existing residential amenity. When sufficient variety in building height and form is not achieved, in certain cases streets can become placeless and difficult to orientate.</p> <p>Any design proposal for the subject site must be informed by, but not be dictated by the adjacent building context. In this case, the proposed development is on an infill site, straddling a community of 2-storey dwellings to the west, and schools and community buildings to the south and east. The height parameters of the neighbouring context must be understood, but cannot determine a suitable height strategy for the proposed development site.</p> <p>As noted elsewhere, architectural analysis of the former church on this site is a useful reference point in determining appropriate height. The proposed development carries a similar alignment to Cardiffsbridge Road, with the retention of existing mature trees serving as a buffer to adjacent housing. The new building is proposed at a similar height to the former church, which is justified due to the similar principles of setbacks and buffers to adjacent buildings. This translates to a 5-storey apartment building, with a step down in height to the south to ensure sufficient sunlight access to the communal courtyard.</p> <p>Modest changes in building plane, parapet height, and finish materials all assist in bringing clarity to the building massing. Changes of material and parapet height are used to pick out the primary north western corner of the building, where the main core entrance and community room entrance are both located. Long facades have been broken up with changes of material and detailing at stairwells, or where there is otherwise a change in building height.</p>
(ii)	buildings address streets and spaces	<p>The development proposal activates a current brownfield street site along an existing street, providing access to a new enclosed public open space. Defined on one side by the existing street, and on the other by the proposed development, a new vibrant node of activity will be created. The proposed development will bring some improvement to the streetscape along Cardiffsbridge Road, in the form of new railings, tree planting, and improvements to pavements and carparking.</p> <p>All publicly accessible spaces, including perimeter streets, and the public open space to the building frontage are overlooked by multiple apartment windows, patio doors and balconies, creating strong opportunities for passive surveillance. The relatively long and narrow proportions of the public space ensure that it is well overlooked, from the road to the west, and from the proposed building to the east, in particular from upper floor apartments. This proposed location also ensures that the public open space is not overshadowed by buildings, with direct access to sunlight to ensure it is bright and attractive during the day, maximising the potential for it to be well used.</p>
(iii)	layout, scale and design features of new	<p>The subject development site forms a ribbon of proposed new development along Cardiffsbridge Road. To the north, the design proposals</p>

No.	Topic	Response
	<p>development respond to prevailing development patterns (where relevant)</p>	<p>for the new church are known (PA. Reg. Ref 3023/19), and the subject proposals can therefore respond to this future context. To the south, whilst the proposals are as yet undeveloped, the SDRA and Finglas Strategy offers sufficient guidance as to the scale and extent of possible development, to which the development of the subject site can respond. The subject development therefore responds to future development within the framework of SDRA policy.</p> <p>As noted elsewhere, architectural analysis of the former church on this site is a useful reference point in determining appropriate height. The proposed development carries a similar alignment to Cardiffsbridge Road, with the retention of existing mature trees serving as a buffer to adjacent housing. The new building is proposed at a similar height to the former church, which is justified due to the similar principles of setbacks and buffers to adjacent buildings. This translates to a 5-storey apartment building, with a step down in height to the south to ensure sufficient sunlight access to the communal courtyard.</p> <p>A full analysis of daylight and sunlight impact has also been undertaken to determine the impact of the subject development on the surrounding buildings. There are no negative impacts, and full details are included elsewhere as part of this planning application.</p>
(iv)	<p>coherent architectural and urban design strategy</p>	<p>A coherent architectural design strategy has been delivered, which will bring benefits to the social sustainability of the Finglas West area. The completion of the subject development will deliver greater variety in residential typologies to the Finglas West area, which is currently dominated by 2&3 bed 2-storey family dwellings. This will allow residents to live in appropriate accommodation within their locality for longer, whilst freeing up underutilised 2&3 bed housing for families.</p> <p>Architecturally, the development aims to be both distinctive and subservient. Within the wider context, the subject development will be distinctive in that, in addition to other adjacent development proposed under the SDRA, it will deliver an increased urban scale as a contrast to the uniform, low rise surroundings. This will help to achieve a sense of place, and aid orientation. At the scale of the subject site, the proposed building is set back from the street edge. Appropriately, the public open space takes priority, and allows the subject building to sit back from the street edge, providing a more tranquil environment for senior residents.</p>

Section 5 of the Apartment Guidelines 2023 sets out locations suitable for increased densities with 5.7 focussing on development on brownfield sites. It recognises that where sites are located close to existing or future transport corridors, the opportunity for their re-development to higher densities should be promoted.

The proposed density is 154 uph. The density is aligned with the recommended density in the Dublin City Development Plan 2022-2028.

Section 28 of the Planning and Development Act 2000 (as amended) provides that planning authorities and An Bord Pleanála shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines. 4 no. SPPRs are included which are addressed in the following table.

SPPR No.	Summary	Development Compliance
SPPR 1	<p>Separation Distances</p> <p>When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p>	<p>The proposed separation distances between opposing windows of apartment blocks on all levels are far in excess of 16 meters with between c. 38m and over 33m. Distances between opposing windows from the apartments and the closest two storey houses on Cardiffsbridge Road are over 48 m.</p> <p>The proposed development therefore complies with this requirement.</p>
SPPR 3	<p>Minimum Private Open Space Standards for Houses</p> <p>Proposals for new houses meet the following minimum private open space standards: 1 bed house 20 sq.m; 2 bed house 30 sq.m; 3 bed house 40 sq.m; 4 bed + house 50 sq.m</p>	<p>Apartment units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).</p>
SPPR 3	<p>Car Parking</p> <p>In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling</p>	<p>Car parking in the scheme has been minimised to 15 spaces overall (including 2 part M spaces). This entails a ratio of 0.14 spaces per dwelling unit.</p>
SPPR 4	<p>Cycle Parking and Storage</p> <p>Safe and secure cycle storage facilities to meet the needs of residents and visitors. A general minimum standard of 1 cycle storage space per bedroom should be</p>	<p>A total of 87 cycle parking spaces are provided. This is accordance with the Dublin City Development Plan standards and is appropriate to meet the needs of residents and visitors for the profile of this future resident community.</p>

SPPR No.	Summary	Development Compliance
	applied. Visitor cycle parking should also be provided.	

Policy and Objective 5.1 - Public Open Space

The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.

Different minimum requirements (within the 10-15% range) may be set for different areas..... in some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity.

The proposed development provides for 13% Public Open Space provision of 935 sqm as well 609 sq.m. Community Open Space and is therefore in accordance with the Guidelines’ Policy Objective.

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

Section 1.2 sets out the national policy background that states street layouts should be interconnected to encourage walking and cycling and offer easy access to public transport.

Section 3.2 identifies types of streets. Arterial streets are major routes, link streets provide links to arterial streets or between neighbourhoods, while local streets provide access within communities and to arterial and link streets.

Section 4.4.3 states that radii on turns from a link street to a local street may be reduced to 4.5m. A maximum radius of 1-3m should be used on local streets. Section 4.4.1 states that the standard carriageway width on local streets should be 5-5.5m, or 4.8m where a shared surface is proposed.

A Stage 1 Quality Audit has been prepared in respect of the proposed development which incorporates a DMURS Street Design Audit and Audits of Accessibility, Cycling, Walking and Road Safety. The Audit has made key suggestions in relation to DMURS compliance and these suggestions have been incorporated into the design proposal for the Part 8 site.

The internal road network within the development will have a carriageway width of 6m and a minimum 2m footpath width in accordance with the guidance set out in DMURS. Corner radii will not be greater than 6m and will allow for the swept path of a 9.62m refuse truck and 12m fire engine. A visibility splay of 49m is required based on a speed limit of 50km/h in accordance with DMURS. Visibility splays in excess of this are achieved from the proposed development access to the surrounding road network once site clearance has been completed.

The proposed development has been designed in accordance with DMURS, please refer to the accompanying Transport and Mobility Management Plan and road drawing prepared by Malone O’Regan.

7.2.5 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)

The key relevant Specific Planning Policy Requirements (SPPR) are summarised in the table below.

SPPR No.	Summary	Development Compliance
SPPR 1	Mix: The guidelines contain a policy setting of a mix of unit sizes. It notes in s.2.21 that this does not apply to 'certain housing schemes, such as sheltered housing'.	The proposed development includes 110 units, of which 106 are 1-bed (96.%) and 4 no. 2 bed (4%). This development is for older persons and therefore qualifies as sheltered housing. On this basis, the development complies.
SPPR 3	<p>Minimum Apartment Floor Areas</p> <ul style="list-style-type: none"> • Studio apartment (1 person) - 37 sq.m • 1-bedroom apartment (2 persons) - 45 sq.m • 2-bedroom apartment (3 persons) 63 sq.m (subject to a max of 10% of overall units) 	<p>Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) and which demonstrates compliance.</p> <p>The proposed development is for 106 no. 1 bed - 2 person and 4 no. 2 bed - 3 person or a total of 110 units.</p> <p>All units meet the floor area requirement.</p> <p>As all 1B2P apartments exceed minimum area plus 10% (49.5m²), the minimum provision of 50% '+10%' apartments is easily achieved. A target minimum of 25% UD apartments has also been exceeded.</p> <p>HQA sets out in table format the floor area of each apartment and the compliance with the Guideline</p>
SPPR 4	<p>Dual Aspect</p> <p>(i) Does not apply to the subject site.</p> <p>(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.</p> <p>(iii) Does not apply to the subject site.</p>	74 of the apartment units are dual aspects. This equates to 67% of the proposed units.
SPPR 5	<p>Floor to ceiling heights</p> <p>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.</p>	The proposed floor to ceiling height of ground floor units is 2.7m in accordance with this specific policy.
SPPR 6	Apartments per core	The proposed development complies with SPPR6. There are three cores in the block. The

SPPR No.	Summary	Development Compliance
	A maximum of 12 apartments per floor per core may be provided in apartment schemes.	cores are broadly located at corner locations. One core could serve up to 11 units, although this is unlikely.

Non-specific policy in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023)

A number of non-specific standards are provided in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023) (Apartment Guidelines 2023) which are outlined below and compliance thereto. This section should be read in conjunction with the Architect’s Housing Quality Assessment (HQA).

Minimum Quantitative Standards

Appendix 1 of the Design Standards for New Apartments - Guidelines for Planning Authorities (2023) sets out minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. Please refer to the HQA and the floor plans of each of floor which demonstrate the bedroom and other rooms sizes.

In relation to communal amenity space, the minimum requirement to be met is set out below:

Table 4: Minimum Requirements for communal amenity space

Unit types	Sqm required	No. of Units	Total required (Sqm)
1-bed	5	106	530
2-bed (3 persons)	6	4	24
Total		110	554

The proposal includes c. 609 sqm of communal open space. The proposed development therefore meets the standard requirement.

Size in excess of ten percent floor area

Section 3.8 (a) of the Design Standards for New Apartments – Guidelines for Planning Authorities provide that *‘the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom units types by a minimum of 10%.....’*.

The HQA demonstrates compliance.

Play areas

The Apartment Guidelines 2023 indicate minimum requirements for play areas of schemes of a certain size. The proposed development (apartment types only) includes 4 no. 2- bed units which would fall below the guidelines requirements applying to schemes greater than 25 units of providing 85 to 100 sqm for toddlers and children aged up to six. It is noted here that the apartment block is planned to be used as sheltered housing for the elderly, so itself, does not yield any play area requirement. As the scheme does not include 100 or more units with two or more bedrooms, a larger play area is not required.

External exercise equipment, an outdoor grill and seating are provided for the residents of the apartment block in the courtyard.

Cycle Provision

Design Standards for New Apartments – Guidelines for Planning Authorities provide the following: Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. Given the proposed housing mix, the guidelines would therefore require the provision of 114 long-stay spaces to serve the development.

Having regard to the nature of the development which will accommodate senior citizens, the cycling provision at the site has been designed in accordance with, table 1, appendix 5, volume 2 the Dublin City Council Development Plan 2022-202850. In this regard, 50 no. long-stay cycle parking spaces are provided. These are sheltered and located in four secure stores inside the building. The storage areas are accessible from the internal courtyard which is closed to non-residents by a gate. This is in excess of the CDP standards which requires 46 no. spaces. It is expected that some residents would not cycle (see the Traffic Mobility Management Plan) and others may use mobility scooters. A dedicated e-bikes and mobility scooter storage area is also provided. This can accommodate 5 no. scooters at one time.

It is important to note here that the cycle parking provision in the Apartment Guidelines 2023 are not SPPRs where they are mandatory. Also, SPPR4 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) has not been incorporated in the Dublin City development Plan. Deviation from the standard is at the discretion of the Planning Authority. In this case, the proposed cycle parking is in accordance with the CDP standards for senior citizen housing and the location is adjacent to high quality bus transport.

In relation to short stay cycle parking, the Development Plan would give rise to a requirement of 27 spaces. The proposed development includes 34 spaces and therefore meets the requirement.

Car Parking

The Design Standards for New Apartments - Guidelines for Planning Authorities state that *'the default policy is for car parking provision to be minimised substantially reduced or wholly eliminated in certain circumstances'*. This policy is applicable in 'highly accessible area such as in or adjoining city cores or at the confluence of public transport systems such rail and bus stations located in close proximity'. The site, being located in a central and/or accessible urban location, avails of lower parking standards.

The site proposed for development under this Part 8 application would qualify as one such central/and or accessible urban location. The site is adjacent to bus stop no 1585 which is served by Dublin Bus lines 40 (Earlsfort Terrace) and 40E (Broombridge Luas) and Goahead Bus' lines 220 (DCU Helix) and 220A (Lady's Well Road). Another stop is located some 160m north on the Cappagh Road. It is served by Dublin Bus 40D (Tyrrelstown) and N4 (Blanchardstown Shopping Centre). The latter stop forms part of the N-Spine of the BusConnect network. In addition, the part 8 site would be located within 500m of the Finglas Village Stop to be located on the Luas Finglas extension. Having regard to the location and nature of development, 15 no. car parking spaces are provided within the site which equates to a car parking ratio of 0.14.

Content of Planning Applications

The Design Standards for New Apartments - Guidelines for Planning Authorities require that certain documents be prepared.

1. A Housing Quality Assessment (HQA) accompanies this part 8 application. It includes compliance with the 10% additional space compliance and details of proposed private amenity, storage space and aspect.
2. A daylight and sunlight analysis report by Digital Dimensions is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of BR209:2022 Site Layout Planning for Daylight and Sunlight (Third edition), also referred to as the BRE guidelines, BS EN 17037:2018+A1:2021 Daylight in Buildings, also referred to as the UK Annex. and IS EN 17037:2018 Daylight in Buildings. Please refer to the accompanying report for the study results.
In summary, 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 without trees and with trees in winter condition and are deemed to meet the recommendations of the BRE guidelines. These are the minimum values, per specified use, to be achieved in habitable rooms and meets the recommendations of the BRE guidelines. In terms of sunlight within the proposed development, 110 units, 82.7% (91 units) have a living spaces which achieves the minimum recommended 1.5 direct sunlight hours. When the '9no. Retained Trees' are included in the assessment model, 78.2% (86 units) meet the minimum recommended 1.5 direct sunlight hours. These results are in line with the BRE guidelines example for an apartment layout where 4 in 5 achieves the target sunlight hours. 3 Both the public and communal amenity spaces achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st March, and meet the recommendations of the BRE guidelines.
3. A building lifecycle report accompanies this application. The report addressed management and energy efficiency.

7.2.6 Urban Development and Building Heights – Guidelines for Planning Authorities (2018)

The *Urban Development and Building Height Guidelines for Planning Authorities* 2018 (Building Height Guidelines 2018) were published to support the achievement of some of the policies and objectives of the NPF 2040, to secure compact and sustainable urban growth, particularly on brownfield and infill sites and that optimal capacity of sites should be sought. This may involve increased height where it can be demonstrated that it complies with certain parameters. The Dublin City Development Plan 2022-2028 reflects the content of these guidelines.

Section 1.10 requires Development Plans and Local Area Plans to support a least 6 storeys at street level in town centre areas along with scope for greater height, subject to meeting performance based criteria. Standard Building height is considered 6-8 storeys.

Section 2.11 recognises that policy direction relating to height is a matter for the development plan which identifies suitable areas for increased height.

The Dublin City Development Plan 2022-2028 applies to the subject site. The proposed development provides for a range of height from 4 to 5 storey within the permissible envelopes of the Dublin City Development Plan.

Much of the policies contained in these Guidelines do not apply to the development owing to its relatively modest height (up to five storeys).

7.3 Regional Policy

7.3.1 Regional and Spatial Economic Strategy (RSES) for the Eastern and Midlands Region 2019-2031

The Regional Economic and Spatial Strategy (RSES) considers that Dublin City and suburbs will be home to 1.4 million people and supports the consolidation and re-intensification of infill, brownfield sites, to provide high density and people intensive uses within the existing built up areas, and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects. Finglas is located in the Strategic Development Areas referred to as the City Centre within the M50.

The Growth Strategy for the EMRA seeks to deliver sustainable growth of the Dublin Metropolitan Area through the Dublin Metropolitan Area Strategic Plan. It promotes compact growth to realise a target of at least 50% of all new homes to be built, to be within the existing built-up area of Dublin City and suburbs. In Dublin City and suburbs the focus lies on the redevelopment of infill and brownfield sites (RPO 3.3 and RPO 4.3) and considers that development should align with the prevailing national guidelines.

Chapter 9 of the RSES particularly focuses on quality of life in the form of consideration of age, diversity, housing and community. The RSES are supportive of greater diversity in housing tenure and type (RPO 9.3). It recognises the importance of social and community infrastructure (RPO 9.14) and for it to be tailored to the needs of those it serves.

The development complies with the principles of the RSES. It will direct development toward a brownfield site. It also includes some community infrastructure with the provision of a community room at ground floor of the apartment block. The proposed development is, for its greater part, composed of older persons housing, which will contribute to a greater diversity in housing tenure in Finglas.

7.4 Local Policy

7.4.1 Dublin City Development Plan 2022-2028

Strategic Objectives

The Dublin City Development Plan (CDP) 2022-2028 is articulated around a number of strategic principles to support a sustainable approach to the development of the city. Under the social/residential principles, the plan seeks to create a more compact city with a network of sustainable neighbourhoods, modelled on the principles of the 15 minute city. This is underpinned by the provision of a range of facilities, choice of tenure and house types to promote social inclusion and integration of all ethnic / minority communities. It also seeks to create a *'connected, legible and liveable city with a distinctive sense of place, based on active streets, quality public spaces and adequate community and civic infrastructure'* under the Urban Form Principle.

The Core Strategy and Settlement Hierarchy present the spatial structure and proposed residential yield in the various areas of the City. Finglas Village Environs and Jamestown is designated as Strategic Development and Regeneration Area (SDRA) 3 with a planned residential yield of 2,800 units which equates to 5,600 persons.

Under CSO7 'Promote Delivery of Residential Development and Compact Growth', the Council seeks 'To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas.' The proposed development is fully aligned with CSO7 as the lands are located in SDRA 3. Under CSO 10, it supports the development of brownfield, vacant and regeneration sites, such as the subject site.

Zoning

The Dublin City Development Plan (CDP) 2022-2028 zones the lands Z1 'Sustainable Residential Neighbourhoods' and Z15 'Community and Social Infrastructure'. Residential is permitted under Z1. Under Z15, community facility, cultural/recreational building and uses are permissible. Car parking ancillary to main use are open for consideration.

In this case, the car parking spaces to be located in the Z15 zoning are to serve the residential element. The CDP envisaged scenarios where an element of residential development may be allowed on Z15. The layout has been arranged to meet the requirements of urban design framework set out under SDRA 3 Finglas. There are therefore limited opportunities for car parking. It cannot be argued that the location of the car parking spaces to the northern fringe of the site would impede the development of the rest of the Z15 lands immediately north of the site as these are already subject of a planning permission for the construction of the new church. The site layout has also favoured pedestrian and cycle movements across the site and sought to remove car movements insofar as practical. Given the need to achieve both active frontage along Cardiffsbridge Road and pedestrian connectivity on two sides of the site, it was therefore deemed that the northern fringe, ie., the lands zoned Z15 was the most suitable for the location of the car parking spaces ancillary to the residential use. The development will not further impinge on the Z15 zoned lands, will not compromise in any way the development potential of the rest of the land bank, which is already subject of a feasibility study; and includes generous community floorspace within the Z1 zoning itself. The minor infringement on the zoned lands is therefore appropriate.

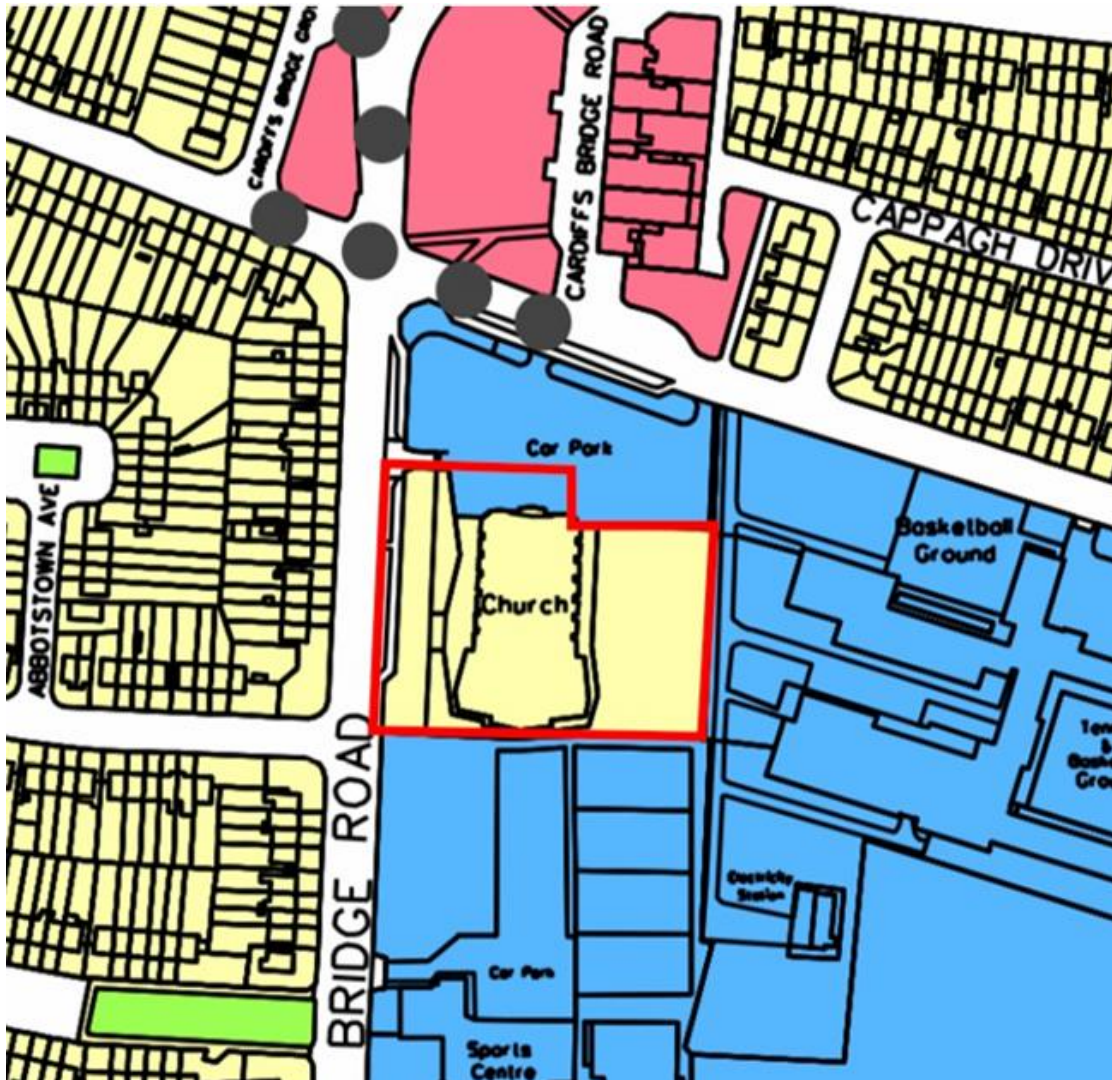


Figure 13: Extract from the land use zoning map of the DCC CDP 2022-2028 (source: DCC)

Strategic Development and Regeneration Area

The site is located in the Finglas Village Environs and Jamestown Lands Strategic Development and Regeneration Area (SDRA) 3. The CDP sets out site specific guiding principles for each SDRA, as well as sets out objectives common to all of them. Response to the objectives is provided in the table below.

Objective SDRA01	Development Response
To support the ongoing redevelopment and regeneration of the SDRA’s in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:	
Architectural Design and Urban Design: All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create	The proposal is of high architectural quality and adheres to architectural and urban design principles. It is aligned with the principles of the 15-minute city.

Objective SDRAO1	Development Response
<p>long term, viable and sustainable communities aligned with the principles of the 15- minute city.</p>	
<p>Phasing: Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.</p>	<p>The proposed development will be delivered in one phase, which includes all open space areas and the community facility.</p>
<p>Access and Permeability: Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.</p>	<p>The development proposes a high-quality urban infill scheme on a key brownfield site. Whilst there is permeability proposed through what is currently a landlocked site, the SDRA notes that there may be a requirement for access and permeability to the east and south of the proposed site, to serve the future development of Fergal's Field. The current proposal allows for this possible eventuality.</p> <p>The site avails of good public transport connectivity, with Dublin Bus stops on Cardiffsbridge Road immediately adjacent. The Part 8 scheme has been designed in accordance with the principles of DMURS.</p>
<p>Height: Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.</p>	<p>The development is set back from the lower density housing units located to its west and is not of such height that it would injure residential amenity.</p>
<p>Urban Greening and Biodiversity: Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.</p>	<p>The proposed public open space provision at the site is in excess of 10% requirement.</p> <p>The proposed landscape design aims to strengthen the value of the site as a place for delivering green/ blue infrastructure whilst protecting and enhancing the natural/built and cultural assets of the site.</p> <p>Biodiversity Enhancement measures have been proposed as part of the Landscape Design Report, with input from the project team, in particular, the Ecologist, NM Ecology. The Biodiversity section of the report details site specific biodiversity enhancement measures and how it will support local biodiversity into the future.</p>

Objective SDRAO1	Development Response
<p>Surface Water Management: All development proposals should provide for sustainable surface water management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature based solutions. See Appendix 11, 12 and 13 for further detail.</p>	<p>For full details of the proposed water services strategy, please refer to the materials prepared by Malone O'Regan and submitted under separate under cover. Included in the Engineering Report submitted as part of this application, is an Integrated Surface Water Management Plan/Strategy. The Surface Water Management Plan includes measures of green/blue roofs to enhance runoff quality, amenity and biodiversity as well as reduce runoff quantity.</p>
<p>Flood Risk: All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA.</p>	<p>The part 8 site is not located in a flood zone A or B. A desktop Flood Risk Assessment was undertaken by Malone O'Regan and is submitted as part of the application.</p>
<p>River Restoration: Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: SDRA 1 Clongriffin/Belmayne and Environs; SDRA 3 Finglas Village Environs and Jamestown Lands; SDRA 4 Park West/Cherry Orchard; SDRA 5 Naas Road; SDRA 6 Docklands; SDRA 7 Heuston and Environs; SDRA 9 Emmet Road; SDRA 10 North East Inner City and SDRA 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail.</p>	<p>N/a to the subject development.</p>
<p>Sustainable Energy: Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDRA 6 (Docklands) and SDRA 10 (NEIC) where applicants must demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDRA 7 (Heuston and Environs), SDRA 8 (Grangegorman/Broadstone), SDRA 11 (St. Teresa's Garden and Environs), SDRA 14 (St. James's Healthcare Campus and Environs), SDRA 15 (Liberties and Newmarket Square)</p>	<p>Please refer to the accompanying Climate Action Energy Statement & Part L Report.</p>

Objective SDRAO1	Development Response
<p>where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated.</p>	
<p>Climate Change: Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.</p>	<p>Please refer to the accompanying Climate Action Energy Statement & Part L Report.</p>
<p>Cultural Infrastructure: All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25 for further detail.</p>	<p>The proposed development provides over 5% community, arts, and cultural spaces. Please see the Architectural Design Statement and area schedules for details. The proposed development includes 434 sqm of community, cultural and arts space that will be flexible in nature to allow for the space to cater for a range of activities and uses for both residents of the scheme and the wider community of Finglas.</p>

The latter element is largely reprised under CUO25 'SDRA and Large Scale Developments' which elaborates on the requirement as follows:

'All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*

**Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.'*

The proposed development includes 434 sqm of community, cultural and arts space which is in excess of the required 5% space required at the subject site. The net internal area of the proposed development is 5776 sqm, which results in an area of 289 sqm (5%) provision required at the site to comply with CUO25. The remaining 130 sqm is provision (2.5%) for a nearby concurrent proposed Part 8 development at Wellmount Road. As outlined under CUO25 it is permissible to relocate a portion (no more than half of this figure) to a site immediately adjacent to the area. Therefore, it is considered appropriate to relocate a portion of community, arts and cultural space required at a proposed part 8 application at Wellmount Road to this subject application at Cappagh Road/ Cardiffsbridge Road in order to deliver a larger space that is capable of adapting to a multitude of uses and activities. The relocation of a portion of the community, arts and cultural space to deliver a greater quantum of space at this subject site is considered to derive better outcome for the usage of this site in particular for arts and cultural facilities in the area which was identified as a deficit in the SIA and Finglas Strategy.

The proposed community, arts and cultural space will be managed by PPP co. and will be open and available for both residents and the surrounding community to utilise. By opening the space to the wider community, this will create pedestrian movement in and out of the site. The proposed development includes internal community space that has been designed to be flexible in nature to allow the space to cater for a range of activities and needs as they arise. A booking system will be developed during the operation of the scheme to facilitate activities and meeting space requirements as the needs arise.

As stated earlier, the SDRA also sets the spatial principles for the development and regeneration of Finglas. These include alia:

- New developments in the village and environs to create enclosure and form active frontages with the streetscape.
- The SDRA Guiding Principles Map identifies a number of development opportunity sites and illustrates indicative key building frontages that respond to the existing street and block structure. The development of a fine urban grain is necessary in order to enhance permeability. The built form to limit the use of set-backs, in order to create a strong street edge and sense of enclosure.
- The bulk, scale and massing of buildings should respect and respond to the site specific context, including historic building stock and archaeological features.
- Key village gateways or arrival points are identified as a fundamental part of the overall urban design strategy and as a tool to re-define the village core. These gateways will reinforce the function and status of the village, enhance the townscape and improve the overall image of Finglas.
- The SDRA Guiding Principles Map identifies public realm projects and urban plazas that will enhance the legibility and townscape, and foster the creation of identity. Key spaces include: a proposed village 'Triangle' as the primary civic space and focal point for the village; a new civic plaza at St. Canice's Graveyard on Church Street; and a new plaza at Cardiffsbridge Road, as illustrated in the SDRA Guiding Principles Map (Figure 13.3). Enhanced pedestrian movement and accessibility underpin the urban design strategy illustrated in the SDRA Guiding Principles Map. Proposed enhancements to routes and proposed new connections should respond to desire lines and include landscaping and tree planting. Barriers to such movement, including existing pedestrian bridges over the Finglas Road are considered significant challenges to achieving a cohesive urban structure. As such, the feasibility of replacing such pedestrian bridges with at-grade crossings will be actively explored and aligned with BusConnects and Luas Finglas proposals'.

The SDRA is presented in map format below.

height should be in the range of 3 to 6 storeys, with monolithic heights avoided. The proposal includes stepped height from 4 to 5 storeys to espouse the changing level of the site and avoid impinging on the development potential of the landbank. Given the width of the surrounding road network, specifically the Cardiffsbridge Road and the Cappagh Road further afield, it is considered the range proposed on site is appropriate and will not impact on the residential amenities of the neighbouring residences fronting the Cardiffsbridge Road.

In relation to design, the streetscape will be unified and provide cohesion to a generally disparate frontage with a low boundary treatment (up to 1.3m in height) and a strong building frontage with interesting façade treatment as envisaged in the guiding principles.

Quality Housing and Sustainable Neighbourhoods

Under QHSN3, the Council seeks to implement its Housing Strategy and Housing Need and Demand Assessment (HNDA) and to encourage the provision of a variety of housing typologies and tenures. This part 8 development will add to the stock of older persons housing which is identified in the housing strategy as an 'increasingly significant issue'.

The part 8 application also supports the achievement of QHSN9 on active land management insofar that the development forms part of the coordinated approach applied to the overall urban block which includes the sport centre, the schools and Fergal's field. With a proposed density of 154 uph, it aligns with QHSN10 as the development is to be located on an underutilised site and will be of high standards of urban design and architecture.

Under this chapter and specifically QHSN11, the Council promotes the realisation of the 15-minute city which *'provides liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible'*. Meanwhile, QHSN12 promotes neighbourhood development.

The proposed development will provide high quality housing for older persons. It is to be located on a site which is served by and in close proximity of high-quality public transport. It is also located adjacent to a planned church and parish centre and beside the LeisurePoint sport centre. There are also plans for the development of a primary care centre on the adjacent Fergal's field. There is also the parade of shops to the north of the landbank across the Cappagh Road and a Dunnes Stores supermarket around 300m south. The Social Infrastructure Audit report prepared to accompany this part 8 application shows the wide range of facilities available within 15 minutes of the site. The site is ideally located to achieve a 15-minute city lifestyle for its residents.

Importantly, the development which consists of the delivery of housing for older persons will make positive contributions to QHSN18 'Needs of an Ageing Population' and QHSN23 'Independent Living' as it will provide housing and public realm that is adapted and adaptable to the needs of its prospective residents.

Dublin City Council Development Plan (2022-2028) advises that a minimum of 50% of apartments are to exceed minimum area standards by 10%, and that in addition, 50% of apartments that are in excess of minimum size requirements are to be designed to be UD compliant. The UD standards noted are the requirements of the 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design (National Disability Authority).

Based on the above requirement, the minimum provision of UD apartments would be 25%. The proposed development has 33% of apartments designed to UD standards. For the proposed development, the design seeks to allow for delivery by any or all Modern Methods on Construction (MMC), including modular volumetric construction. In order to allow for varied MMC approaches, it is proposed that 100% of apartments will be in excess of minimum size standards.

The delivery of 100% of apartments in excess of minimum area standards is a constructability consideration, and is not as a consequence of compliance with the DCCDP. Therefore, in order to comply with the DCCDP UD requirement, it is proposed that a proportion of all apartments (in this case, between 50% and 66%) will be designated as the '+10% area' apartments for the subject development, so as to ensure that at least 50% of apartments that are in excess of minimum size requirements are to be designed to be UD compliant. As all 1B2P apartments exceed minimum area plus 10% (49.5m²), the minimum provision of 50% '+10%' apartments is easily achieved. A target minimum of 25% UD apartments has also been exceeded.

The proposed development includes a large community space (434 sqm) to front Cardiffsbridge Road. The space has been designed in a regular shape to allow for it to be split or used as one space as needed. It is adaptable and will be available to residents and non-residents alike. The provision of such space is aligned with policies QHSN47 High Quality Neighbourhood and Community Facilities and QHSN50 Inclusive Social and Community Infrastructure. A social infrastructure audit accompanies this part 8 submission in accordance with QHSN48 Community and Social Audit.

Sustainable Movement and Transport

Under chapter 8 of the CDP, Policy SMT1 'Modal Shift and Compact Growth' and objective SMT01 'Transition to More Sustainable Travel Modes', the Council promote a shift from the use of private car towards an increased use of more sustainable forms of transport and more active mobility. The proposed development includes for 15 no. car parking space or a ratio of 0.14. It makes generous allocations for cycle parking, including mobility scooters and it is located near a range of buses. There are also plans for the development, within 500m of the site, of the Finglas Village Luas Stop, to be located on the planned Luas Finglas, which a key sustainable project under SMT22. The proposed development supports both the policy and the objective.

In accordance with policy SMT4 'Integration of Public Transport Services and Development', the proposed development has a density of 154 uph, provides for connectivity between uses, as well as different routes between Cardiffsbridge Road and the Cappagh Road.

Importantly, the site makes allocations for connectivity as can be seen in the site layout plan (drawing no. SHB4-CAF-DR-SHA-AR-P3-0008-Proposed Site Layout Plan), as set out in the Guiding Principles for SDRA 3 and policy SMT13 'Urban Villages and the 15-Minute City'.

Under SMT010 'Walking and Cycling Audits', the suite of documentation prepared for this part 8 application includes a walking and cycling audit contained in the accompanying Traffic Mobility Management Plan prepared by Malone O'Regan.

SMT27 'Car Parking in Residential and Mixed Use Developments' promotes sustainable car parking with a view to promote city living and reduced car parking standards. The proposed development includes a 15 no. spaces within the site, 1 no. motorcycle space and an additional 3 on-street parking spaces.

The accompanying Traffic Mobility Management Plan prepared by Malone O'Regan includes a section on Mobility Management measures, that range from both hard and soft measures to be implemented once the site is occupied.

Green Infrastructure and Recreation

A number of policy objectives relate to green infrastructure. In particular, it requires under GI4 'Accessibility', that all green infrastructure elements should be universally accessible and that new developments should include green infrastructure and an ecosystem services approach (GI6 'New Development / New Growth Areas'). All areas of open space will be universally accessible and will incorporate blue and green roofs, as well high quality landscape features which together will support mitigation and adaptation to climate change. Space for physical activity is also provided to the residents to the scheme, with the provision of exercise equipment in the courtyard.

GIO1 ('Green Roof Guidance Document') should also be noted. The development response is provided under the development management section of this report. GI28 'New Residential Development' requires that, in new developments, public open space is provided which is sufficient in amenity, quantity and distribution. The proposed development includes high quality public and communal open space and therefore meets the requirement.

The CDP also includes policies on tree planting and retention. In particular, it requires appropriate and long-term tree planting in the planning of new developments (GI40) and the protection of existing trees (GI41). The proposed development both retains existing trees and includes tree planting into landscape proposals.

It is important to note that the development does not include children's play facilities as required under GI51 and GI52, as it consists of sheltered housing (i.e for older persons).

Development Management Standards

The development management standards are contained in the Chapter 15 of the Dublin City Development Plan 2022-2028. Table 15-1 of the CDP shows the suite of documents required to accompany applications for development.

Table 5: Planning Application Documentation

Reports	Threshold	Application Reference
Architectural Design Report	50 or more residential units	See Architect Design Statement
Housing Quality Assessment	All residential development	See HQA
Landscape Design Report	30 or more residential units	See Landscape Design Report
Planning Report	30 or more residential units	This report
Daylight and Sunlight Assessment	All apartment developments	Daylight and Sunlight Assessment of a Proposed Development at Cardiffsbridge Road
Community and Social Audit	50 or more residential units	See Social Infrastructure Audit

Reports	Threshold	Application Reference
	Any development comprising of community or social infrastructure	
Lifecycle Report	All apartment developments	See Building Lifecycle Report
Community Safety Strategy	100 residential units	Included in Architect Design Statement
Operational Management Statement	30 or more residential units	See Building Lifecycle Report and Operational Waste Management Plan
Traffic and Transport Assessment	50 or more residential units	See Traffic Mobility Management Plan
Mobility Management Plan / Travel Plan	20 or more residential units Any development with zero/reduced car parking.	See Traffic Mobility Management Plan
Road Safety Audit	Any development with construction of new roads, materially affects vulnerable users and amends existing roads or generating significant road movement	See Quality Audit
Site Specific Flood Risk Assessment	Any developments within a flood zone a and b	See Desktop Flood Risk Assessment
Engineering Services Report (Civil and Structural)	30 or more residential units	See Engineering Report
Site Investigation Report	All developments on site that comprise of contaminated lands and/or where basement is proposed.	See Site Investigation Report and Waste Classification Report
Construction Management Plan	30 or more residential units	See Construction & Environmental Management Plan
Construction Demolition Waste Management Plan	30 or more residential units	See Resource Waste Management Plan
Operational Waste Management Plan	30 or more residential units	See Operational Waste Management Plan
Climate Action and Energy Statement (including District Heating)	30 or more residential units	See Climate Action and Energy Statement, Sustainability & Part L Compliance Report
Noise Assessment	Any noise generating use and or any development within designated noise zones as indicated on development plan zoning maps.	Not Applicable. The site is not within a designated noise zone as indicated on the development plan zoning maps.
Conservation report	Any development relating to a protected structure, within the	n/a

Reports	Threshold	Application Reference
	curtilage of a protected structure, and / or effecting or within the curtilage of a protected monument.	
Retail Impact Assessment	Retail development *** of 2,000 sq. m (net comparison floorspace) and 1,500 sq. m. (net convenience floorspace) outside of the city centre and KUV's.	n/a
Ecological Impact Assessment	All developments that are located within or adjacent to any sensitive habitat, on sites that could contain protected species or in a quality landscape environment.	See Preliminary Ecological Appraisal. Ecological Impact Assessment is not required.
Appropriate Assessment Screening and NIS	An Appropriate Assessment Screening is required for all developments. A stage 2 (Natura Impact Statement) is required where significant effects on the environment are likely either alone or in combination with any other project.	See Appropriate Assessment Screening Report. NIS not required.
Environmental Impact Assessment	All developments within the threshold set out in Planning and Development Act 2000, as amended or any development that has a significant impact on the environment.	See EIA Screening Report.
Landscape and Visual Impact Assessment, Microclimate Assessment, Telecommunications Report – see Appendix 3	Site specific circumstances	Not applicable

A Schedule of Documentation prepared by MacCabe Durney Barnes accompanies this Part 8 application. In addition to the above documentation, a number of additional documents accompany this application:


- A biodiversity enhancement plan has been incorporated within the Landscape Design Report.
- A Glint and Glare Assessment prepared by Macro Works Ltd is submitted under separate cover. The report concludes that there will not be any significant nuisance effects from the glint and glare of the proposed development, as a result of the proposed roof mounted solar PV panels.
- A series of photomontages have been developed in respect of the scheme and accompany this application. Having regard to the modest scale of development at an infill site, the proposed insertion of the development within the existing landscape context is considered appropriate. The retention of the existing

mature trees along the western side of the site provides a screening and transition between the existing dwellings adjacent to the site along Cardiffsbridge Road and the subject site.

Brownfield Sites

The table below summarises the considerations as they relate to brownfield sites.

Consideration	Development Response
To encourage innovative, high quality urban design and architectural detail in all new development proposals	Please refer to the Architect Design Statement prepared by SHA. The statement includes descriptive and illustrative information on the development proposal, context in which the development is set and the design rationale for the scheme. In addition, the design statement analyses the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development, including the building massing, materials and finishes and building articulation.
To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.	Table 15-2 Information Requirement for Design Statements is noted, it is submitted that the content of the Planning Report and Design Statement satisfy the information requirements for residential developments.
To respect and enhance existing natural features of interest.	The principal natural features are the trees located to the west of the site. The proposed layout seeks to retain as many trees as possible.
To contribute to the streetscape creating active and vibrant public realm.	The proposed development includes an area of public open space to the west, fronting Cardiffsbridge Road.
To create animation and create activity at street level and vertically throughout the building.	The open space is the principal space separating the street from the community space proposed in the western wing of the building. This will provide an attractive proposition at this location creating pedestrian movements in and out of the site.
To provide for appropriate materials and finishes in the context of the surrounding buildings.	The palette of existing building materials in the Finglas West area is painted or pebble-dashed render. In response to this, the predominant finish material to proposed facades is of clay brick in 2 no. off-white/ buff-multi colours. Please refer to section 6.3 Material and Finishes of the Architect Design Statement for further details.
To ensure land contamination is appropriately dealt with and mitigated against.	A Site investigation Report and Waste Classification Report accompany this application.
To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.	Please refer to section 6.5 Site Connectivity and Permeability of the Architect Design Statement. An extract of the illustration is shown below:

Consideration	Development Response
	 <p>(Source: Sean Harrington Architects)</p>
<p>To create new compositions and points of interest.</p>	<p>The proposed location of the community space on the western end of the site, i.e on the Cardiffsbridge road will provide for a new point of interest.</p>
<p>To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area</p>	<p>The proposed development includes 434 sqm of community, arts and culture space, in addition to 110 residential units.</p>
<p>To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.</p>	<p>Please refer to the landscape plans and arboricultural plans which show how existing trees are being retained.</p>
<p>To prioritise pedestrian and cycle movements in connection with public transport infrastructure.</p>	<p>There is a strong focus on pedestrian and cycle movement as part of the site layout. Car parking is clustered in one main area, to the north west of the site. This will avoid conflicts with other users and allow them priority and safety around the site.</p>
<p>To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes</p>	<p>The proposed development will create a strong frontage on the Cardiffsbridge Road. The aspect of the road is currently poor with no cohesion on its entire length. This development will create a focal point to the north part of the road, which will be complemented at later stages by works envisaged as part of the Fergal’s Field feasibility study, noted in previous sections of this report.</p>
<p>To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.</p>	<p>Please refer to section 9 recommendations of the accompanying Climate Action, Sustainability and Part L Compliance Report</p>
<p>Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.</p>	<p>Waste management has been duly considered. There is adequate waste storage to service the development and visibility splay for refuse trucks have been prepared.</p>

Green Infrastructure and Landscaping

The CDP requires that planning applications address climate action as part of the overall design and incorporate green infrastructure techniques. In addition to the retention of existing natural features, the development should include:

Standard	Development Response
<p>Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.</p>	<p>The proposal incorporates as many of the existing trees as possible into the layout and landscape proposals.</p>
<p>The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city’s green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and ‘stepping stones’ to ensure biodiversity protection. (see also GI7 ‘Connecting Greening Elements in Site Design’)</p>	<p>The proposed development will provide for an area of open space to the west of the block. This will allow to maintain a link in the green infrastructure network between the various areas of open space.</p>
<p>Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council’s Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.</p>	<p>A number of trees along the western boundary will be retained to ensure the landscape character within the local area is not significantly impacted. In combination with these retained trees, new tree planting has been proposed closer to the road and internally within the site. In time, the proposed new planting will mitigate the loss of trees and canopy cover across the site.</p>

Surface Water Management and SuDS

Standard	Development Response
<p>All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council’s Surface Water Management Guidance.</p>	<p>A Surface Water Management Plan for the Development is incorporated into Malone O’Regan Engineering Report.</p>
<p>SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer</p>	<p>Please refer to the Engineering Report prepared by Malone O’Regan which provides a comprehensive overview of the SuDS measures proposed at the site.</p>

Standard	Development Response
	In addition, drawing no. SHB5-CAF-DR-MOR-CS-P3-151 SuDS Drainage details and SHB4-CAF-DR-MOR-CS-P3-150 SuDS Layout.

Green/Blue Roof

Consideration	Development Response
All new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23	Green and blue roofs will be installed above the apartment flat roof buildings. These roofs will provide initial storage of rainwater, while also reducing the rate at which rainwater from heavier rainfall events discharges to the attenuation systems. They can also help to filter the run-off, removing pollutants and resulting in a higher quality of water discharging into the drainage system and receiving watercourse. Refer to the Malone O’Regan SuDS detail drawing no. SHB4-CAF-DR-MOR-CS-P3-151 for typical roof details.

Urban Greening

Consideration	Development Response
All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc.	Please refer to landscape drawing no. SHB5-CAF-DR-MAL-L-P1-0001- Landscape Plan.

Landscape Plans and Design Reports

Consideration	Development Response
Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	A Landscape Design Report prepared by Mitchell Associates accompanies this application.
Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans	Please refer to landscape drawing no. SHB5-CAF-DR-MAL-L-P1-0001- Landscape Plan.
A tree survey must be submitted where there are trees within a proposed planning application site.	Please refer to drawing no. 230427-P-50 Tree Survey Plan.

Public Open Space and Recreation

Standard	Development Response
The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.	The development proposal activates an existing street and effectively creates a new enclosed public open space, creating a new vibrant node of activity. Community uses and public realm combine to achieve this, with good passive surveillance from apartments above. The new public realm and street interface combine to create attractive spaces for enjoyment and social contact.
Open space should be overlooked and designed to ensure passive surveillance is achieved	Please refer to landscape drawing no. SHB5-CAF-DR-MAL-L-P1-0001- Landscape Plan.
The space should be visible from and accessible to the maximum number of users.	Please refer to drawing no. SHB5-CAF-DR-MAL-L-P1-0001- Landscape Plan.
Inaccessible or narrow unusable spaces will not be accepted.	No inaccessible or unusable spaces are proposed.
The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16	Please refer to the Daylight and Sunlight assessment.
Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks.	While there a greenfield site adjacent to the site, it is earmarked for development.
Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	Trees are retained insofar as possible. Please refer to the arborist drawings and reports for further details.
Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.	
Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated biodiversity areas or wetlands which can reduce / better manage surface water run-off.	A coordinated approach within the landscape design has been taken for water management, with the provision of permeable surfaces and build-ups throughout the scheme.
Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12).	Please refer to landscape drawings. A hierarchy of spaces is provided with public and communal open spaces and private open space.
Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	Please refer to the Architect’s Design Statement.
Street furniture should be sited such that it does not provide an obstacle for people with disabilities and	Please refer to landscape drawing no. SHB5-CAF-DR-MAL-L-P1-0001- Landscape Plan. Please refer to the

Standard	Development Response
should be designed so that it is fully accessible where feasible.	accompanying Landscape Report which includes details on the proposed street furniture. Seating has been placed adjacent to mobility equipment to ensure resting points are close and easily utilised for residents.
Age friendly measures should be incorporated into the design.	The development is for older persons so the development is by nature age friendly.
Permeability and accessibility for all users, particularly disabled persons should be provided	Please refer to the Architect’s Design Statement.
Cycle and pedestrian friendly routes should be accommodated.	Pedestrian and cycle movements are prioritised over car movements throughout the site.

Boundary Treatments

Standard	Development Response
Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.	Please refer to landscape drawing no. SHB5-CAF-DR-MAL-L-P1-0001- Landscape Plan.

Public Open Space

Standard	Development Response
The planning authority will seek the provision of public open space in all residential schemes and commercial developments in excess of 5,000 sqm. In accordance with Table 15-1, 10% is required in Z1 zoning.	The proposed development includes the provision of 935 sqm. This equates to 13%.

Play Infrastructure

Standard	Development Response
In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.	As stated earlier, the development is for sheltered housing and therefore it is not expected that there would be children residents. It is therefore not proposed to include play infrastructure. Instead, mobility exercise equipment is proposed.

Apartment Standards

Standard	Development Response
<p>Unit Mix Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> <p>Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department.</p>	<p>This part 8 proposal was formulated jointly with the DCC Housing Department. The department has identified a need for older persons housing. The Council’s Housing Strategy has also identified housing for older persons as an increasingly significant issue.</p>
<p>Unit Size / Layout Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments</p>	<p>A HQA has been provided with this Part 8 application and provides a breakdown of each unit and demonstrates compliance. All units meet the floor area requirements.</p>
<p>Dual Aspect Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate</p>	<p>74 of the apartment units are dual aspects. This equates to 67% of the proposed units.</p>
<p>Floor to Ceiling Height A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided</p>	<p>The proposed apartments exceed these standards in all cases.</p>
<p>Lift, Stair Cores and Entrance Lobbies a maximum of 12 apartment per core may be provided</p>	<p>The proposed development complies. There are three cores in the block. The cores are broadly located at corner locations. One core could serve up to 11 units, although this is unlikely.</p>
<p>Internal Storage Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments</p>	<p>Internal storage has been provided in accordance with the Apartment Guidelines.</p>
<p>Private Amenity Space Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the</p>	<p>All units comply with their private open space requirements with the provision of balconies above ground floor and private curtilage space which will be railed and gated to define the public/ private interface.</p>

Standard	Development Response
<p>Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p> <p>At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.</p>	<p>Please refer to drawing no. SHB5-CAF-DR-MAL-L-P1-0001- Landscape Plan for privacy strip at ground floor. The proposed development includes a privacy strip at ground floor level.</p>
<p>Communal Amenity Space</p> <p>All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development. The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p>	<p>The proposed development includes a single communal open space within the internal courtyard. The proposed space is c.609 sqm which complies with the required space provision.</p>
<p>Internal Communal Facilities</p> <p>Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.</p>	<p>A large community, arts and cultural space is provided as part of the development</p>
<p>Security</p> <p>New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas.</p>	<p>Please refer to section 12 of the Architect's Design Statement, which details how the proposed development complies with the requirements of Section 15.4.5 Safe and Secure Design of the Development Plan.</p>
<p>Access and Services</p> <p>Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.</p>	<p>All pedestrian and vehicular access points are clearly defined and overlooked by the perimeter block and have been designed to suit all users, regardless of their abilities.</p>
<p>Refuse Storage</p> <p>Refuse storage and collection facilities should be provided in all apartment schemes.</p> <p>All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan.</p>	<p>Refuse storage is provided, please refer to drawing no. SHB4-CAF-DR-SHA-AR-P3-1000-Proposed Level +0 Plan.</p> <p>An Operational Waste Management Plan accompanies this part 8 application.</p>

Standard	Development Response
<p>Lifecycle Reports All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p>	<p>A Building Lifecycle Report accompanies this application.</p>
<p>Operational Management and Maintenance All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p>	<p>A building lifecycle report accompanies this application. It is intended that the development will be delivered through a Public Private Partnership (PPP) structure which will include maintenance and tenancy management services. Under this arrangement, the appointed PPP Company in partnership with an Approved Housing Body, will be responsible for the maintenance and management of the development and the life cycling of building elements on behalf of Dublin City Council and the residents over a 25-year period. Thereafter the maintenance and management of the development will be handed over to Dublin City Council.</p>
<p>Microclimate – daylight and sunlight, wind and noise All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind</p>	<p>The City Development Plan 2022-28 addresses Microclimate at Section 15.9.16 Microclimate – Daylight and Sunlight, Wind and Noise. 15.9.16.3 specifically refers to Noise. It states “Proposals close to noisy places, such as busy streets / railway lines, may need a noise impact assessment and mitigation plan.” The subject site is in a suburban location that is not located close to busy streets or railway lines. The site is set-back from Cardiffsbridge Road. The site is not within a designated noise zone as indicated on the development plan zoning maps. A noise impact assessment is therefore not required in this location.</p> <p>Wind Assessment is appropriate when a proposed development significantly taller than its surrounding environment, which is considered for buildings up to 25m and over (Wind Microclimate Guidelines for Developments in the City of London (August 2019), while in an Irish context, there is no specified threshold in an Irish context. The proposed development is 5 storeys in height with prevailing heights of 2 storeys. The Development Plan notes that a wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity</p>

Standard	Development Response
	<p>spaces, roof gardens and at the entrance points to the scheme. Having regard to the proposed height, prevailing building heights and the block layout proposed, it is not considered necessary to undertake a microclimate study as part of the development.</p> <p>A Sunlight and Daylight Assessment has been undertaken by Digital Dimensions.</p>
<p>Daylight and Sunlight A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>	<p>A daylight and sunlight assessment accompanies this part 8 application.</p>
<p>Separation Distance Traditionally a minimum distance of 22m is required between opposing first floor windows.</p>	<p>The recently issued Compact Settlement Guidelines for Planning Authorities SPPR1 reduces the separation distance to a 16 meter distance, or below in certain circumstances.</p> <p>The proposed separation distances between opposing windows of apartment blocks on all levels are far in excess of 16 meters with between c. 38m and over 33m. Distances between opposing windows from the apartments and the closest two storey houses on Cardiffsbridge Road are over 48 m.</p> <p>The proposed development therefore complies with this requirement.</p>

Standards as Derived from the Appendices

A number of standards are derived from the appendices of the CDP.

Standard	Development Response
<p>Density Ranges SDRA: 100-250 uph</p>	<p>The proposed development has a density of 154 uph and therefore is well within the ranges of the CDP for a site within a SDRA.</p>
<p>Plot ratio and coverage: While the site is located with a SDRA, having regard to the suburban context of the site, it is considered that the plot ratio and coverage listed under an outer employment and residential area are considered applicable: Indicative plot ratio – 1.0-2.5</p>	<p>The proposed plot ratio is 1.30. The proposed site coverage is 27.7%.</p> <p>The proposed plot ratio complies. It is noted that these figures are indicative rather than fixed, and therefore, it is considered that the proposed site coverage is acceptable.</p>

Standard	Development Response
Indicative Site Coverage – 45-60%	
<p>Bicycle Parking Standards</p> <p>Table 1 of appendix 5 sets out parking standards: Based on the objectives to deliver older persons housing at this site the following standards apply: 1 space per 5 residents (long term) and 1 per 10 residents (short term).</p>	<p>50 no. long stay spaces and 34 no. short stay spaces are proposed.</p> <p>Additional mobility scooter parking space is provided.</p>
<p>Car Parking Standards</p> <p>The site falls under Zone 2 – key transport corridor Based on the objectives to deliver older persons housing at this site the following standards apply: 1 per 2 dwellings</p>	<p>The proposed car parking provision at the site includes 15 no. spaces consisting of 13 no. standard spaces and 2 no. Part M spaces.</p>
<p>Electric Vehicles</p> <p>All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.</p>	<p>In accordance with the development plan, 50% of spaces will have EV chargers installed and ducting has been proposed for all carpark spaces for future EV charging connections. Please refer to drawing no. SHB5-CAF-DR-SMK-ME-6035-EV charging for details on the e-car charging requirements.</p>
<p>Motorcycle Parking</p> <p>New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided</p>	<p>Having regard to the nature of the proposed development, 1 no. space is proposed which equates to 5% provision.</p>
<p>Waste Storage Facilities</p> <ul style="list-style-type: none"> • Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of nonreusable receptacles such as bags, ideally of 1,100 litre capacity, must be used. • To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general (residual) waste, dry mixed recyclables and organic waste. A proposal on the three-bin system including bin quantity, type and frequency of collection must be submitted in writing to the Waste Regulation Unit in Dublin City Council for agreement. Sufficient space must be provided to accommodate the collection of dry mixed recyclables and organic waste. 	<p>Please refer to drawing no. SHB4-CAF-DR-SHA-AR-P3-1000 Proposed Level +0 Plan prepared by SHA which illustrates the location of dedicated waste storage facilities at ground floor. An Operational Waste Management Plan has been prepared by Traynor Environmental and accompanies this application.</p>

Standard	Development Response
<ul style="list-style-type: none"> Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes. 	
<p>Green and Blue Roof Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application. The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.</p> <p>Minimum coverage for an extensive green roof is 70% Minimum coverage for an intensive green roof is 50%.</p>	<p>Please refer to Engineering Report prepared by Malone O'Regan and the accompanying roof plan drawing no. SHB4-CAF-DR-SHA-AR-P3-1005 prepared by SHA.</p>
<p>SuDS Requirements SuDS requirement 1 – runoff destination SuDS requirement 2 – hydraulic control SuDS Requirement 3 – Water Quality SuDS Requirement 4 – Amenity SuDS Requirement 5 - Biodiversity</p>	<p>Please refer to the accompanying Engineering Report prepared by Malone O'Regan for details of the proposed SuDS measures. Drawing no. SHB4-CAF-DR-MOR-CS-P3-150 SuDS Layout.</p>
<p>Surface Water Management Planning Development including or in excess of 2 no. residential units or 100 sq. m. of non-residential uses (including social and community uses) All developments with surface water implications which fall within these thresholds will be required to prepare a SWMP as part of their project design process.</p>	<p>Please refer to the Engineering Report prepared by Malone O'Regan which details the surface water management proposed as part of the project.</p>

8. ENVIRONMENTAL ASSESSMENTS

8.1 Environmental Impact Assessment

An Environmental Impact Assessment (EIA) Screening report was prepared by MacCabe Durney Barnes to accompany this Part 8 application. It concludes:

'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*
- *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.'

8.2 Appropriate Assessment

An Appropriate Assessment Screening Report has been prepared by NM Ecology and accompanies this application. The AA Screening concludes:

"In Section 3 of the OPR guidance (OPR 2021), it is stated that the first stage of the AA process can have two possible conclusions:

1. No likelihood of significant effects

Appropriate assessment is not required and the planning application can proceed as normal. Documentation of the screening process including conclusions reached and the basis on which decisions were made must be kept on the planning file.

2. Significant effects cannot be excluded

Appropriate assessment is required before permission can be granted. A Natura Impact Statement (NIS) will be required in order for the project to proceed.

Having considered the particulars of the proposed development, we conclude that this application meets the first conclusion, because there is no likelihood of significant impacts on any European sites. This is based on three key conclusions:

- *The Site is not within or adjacent to any European sites, so there is no risk of direct effects*
- *There are no surface water (or other) pathways linking the Site to any European sites, so there is no risk of indirect effects*
- *Habitats within the Site are unsuitable for any of the birds associated with nearby SPAs.*

Appropriate Assessment Screening must consider the potential implications of a project both in isolation and in combination with other plans and projects in the surrounding area. An 'in-combination effect' can occur when a project will have a perceptible but non-significant residual effect on a European site (when considered in isolation), that subsequently becomes significant when the additive effects of other plans and projects are considered.

However, as the proposed development poses no risk of impacts on European sites in isolation, the risk of in-combination effects can also be ruled out.

Therefore, with regard to Article 42 (7) of the European Communities (Birds and Natural Habitats) Regulations 2011, it can be concluded that the proposed development will not be likely to have a significant effect on any European sites. On this basis, the assessment can conclude at Stage 1 of the Appropriate Assessment process, and it is not necessary to proceed to Stage 2.

In accordance with the OPR 2021 guidance, we note that no mitigation measures have been considered when reaching this conclusion”

8.3 Preliminary Ecological Appraisal

A preliminary Ecological Appraisal Report has been prepared by NM Ecology and accompanies this report. The only Important Ecological Features identified in this assessment are the treeline and nesting birds. Potential impacts on these features are considered in Section 4.1 of the above-mentioned report. All other ecological features discussed in Section 3 of the report are considered to be of Negligible ecological importance, so they are not listed as Important Ecological Features. In addition, suggested ecological enhancement measures are proposed in Section 4.2 of the accompanying Preliminary Ecological Appraisal.

In terms of the treeline and nesting birds, the report states:

“Some mature trees suitable for nesting birds will be felled to accommodate the proposed development. The canopies of these trees could potentially be used by nesting birds. Under Section 22 of the Wildlife Act 1976 (as amended), it is an offence to kill or injure a protected bird or to disturb their nests. If any of the trees will need to be felled or otherwise modified, it is recommended that it takes place between September and February (inclusive), i.e. outside the nesting season. If this is not possible, an ecologist will survey the affected areas in advance to assess whether any breeding birds or mammals are present. If any are encountered, vegetation clearance will be delayed until the breeding attempt has been completed, i.e. after chicks have fledged and a nest has been abandoned.”

The accompanying report also includes a number of Biodiversity Enhancement and Net Gain measures to compensate for the removal of existing habitats at the site. As the Site is of low baseline ecological importance, and no ecological impacts are currently envisaged, the Preliminary Ecological Appraisal concludes it is not necessary to carry out an Ecological Impact Assessment. The Preliminary Ecological Appraisal has been submitted in the Part 8 application to demonstrate that ecological features have been considered.

8.4 Flood Risk Assessment

The site is neither located in flood zone A or B in the Dublin City Strategic Flood Risk Assessment. A desktop Flood Risk Assessment has been prepared by Malone O'Regan and accompanies the application. The assessment concludes:

- *“A DFRA appropriate to the type and scale of development proposed, and in accordance with ‘The Planning System and Flood Risk Management Guidelines – DoEHLG-2009’ has been undertaken.*
- *The proposed development site has been scoped and assessed for flood risk in accordance with the above guidelines.*

- *The primary flood risk to the proposed development site can be attributed to a fluvial flood event in the River Tolka beyond the southern site boundary. The site is not at risk of pluvial or groundwater flooding.*
- *The Register Of Hydrometric Stations in Ireland indicates that the Finglas Weir Gauging Station is a water level and flow recorder station and is currently inactive. The gauge datum recorded at this point is 17.502m. The Botanic Gardens Gauging Station is a water level and flow recorder station and is currently active. The gauge datum recorded at this point is 11.439m.*
- *The minimum finish floor proposed is 63.350m. The finish floor level is significantly higher than both of the gauge datum recorded. This indicates that the site is not at risk to possible flooding.*
- *The Strategic Flood Risk Assessment, Dublin City Development Plan contains a Composite Flood Zone Map. The map indicates that the proposed development falls within a predictive Flood Zone C. There is no Zone A nor Zone B within the vicinity of the site. The nearest zone A or B is at the River Tolka 600m away.*
- *Overall, and in consideration of the findings and recommendations of this DFRA, it is considered that the development as proposed is not expected to result in an adverse impact to the hydrological regime of the area or to increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective."*

8.5 Archaeology

An Archaeological Impact Assessment has been prepared by John Purcell Archaeological Consultancy. Policy Objectives BHA26.4 of the Development Plan requires development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.

As part of the pre-part 8 process, an archaeological impact assessment has been prepared and submitted as part of the pre-part 8 process, which allows for technical departments such as City Archaeologists to provide feedback on the documentation and plans submitted and outline any issues prior to the formal initiation of the Part 8 procedure. In this regard, it is considered that the pre-part 8 process and the archaeological assessment submitted as part of the pre-part 8 process meet the requirements of BHA26.4 (Section 11.5.5).

In summary the Archaeological Impact Assessment report concludes:

"A recent review of the archaeological evidence for a site at the site of the Church of the Annunciation Finglas, indicates that no historic structures or archaeological remains have been identified within the immediate environs, suggesting a low potential for discovering historic remains. However, due to the scale of the proposed development and in compliance with Dublin City Council (DCC) requirements, archaeological testing is recommended. This testing will be conducted under a license issued by the National Monuments Service (NMS) and should adhere to the framework and Principles for the Protection of the Archaeological Heritage.

The testing process must be thorough, utilizing appropriate methods to ensure comprehensive examination of potential subsurface remains. If any archaeological remains are identified, further mitigation measures will be required, which could include either avoidance or preservation by record, depending on the significance of the finds and the development's impact.

A detailed method statement must be prepared, outlining the impact of the development on any potential remains and including a strategy for resolving any identified remains. This statement and strategy will be formulated in consultation with the NMS to ensure compliance with regulatory requirements and best

practices. While the current review suggests a low potential for historic remains, the recommended archaeological testing is crucial to safeguarding any potential archaeological heritage, ensuring any discovered remains are appropriately managed and preserved in accordance with established archaeological principles and regulations.

All recommendations are subject to agreement with the Office of the Dublin City Archaeologist and the NMS."

9. CONCLUSIONS

In summary, the proposed development is for social housing on zoned lands under the control of Dublin City Council. The proposed development consists of apartments with landscaped areas, play area, parking and ancillary works.

The proposed development which includes older persons housing, will make a positive contribution to the diversification of the housing stock in Finglas, Dublin 11. It will particularly allow for downsizing opportunities for older tenants who may require better appointed or smaller housing options. It will also allow to provide much needed housing for those on the Council housing waiting list.

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this site. This statement accompanying this Part 8 application demonstrates that the proposed development is consistent with the national, regional and local planning policy framework and that the proposal will provide for an effective and efficient use of this site which is highly accessible and well served by public transport.

The proposed development is aligned with the SDRA 3 – Finglas and the urban design framework set out under the Finglas Strategy. It also makes for generous allocation for community space which will keep the site opened to the public, creating active frontage on the Cardiffsbridge Road. Internally to the perimeter block, the courtyard fitted with fitness equipment will be an attractive proposal for prospective tenants. The proposed development will contribute to a diversification of housing tenure in Finglas and make a positive contribution to the area owing to the provision of high quality landscaped open space.



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