

# Planning Statement

Social Housing Bundle 4, Development at Wellmount Road, Finglas

Dublin City Council

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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 77 no. residential units on a site of circa 1.34 hectares in area, located at the Cardiffsbridge Road, Wellmount Road and Wellmount Drive, Finglas, Dublin 11.

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 Wellmount Road site includes apartment units. 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 77 residential units and 135 sqm of community, arts and cultural space at a site c. 1.34 ha located at a site bound by Wellmount Drive, Wellmount Road and Cardiffsbridge Road, Finglas, Dublin 11.

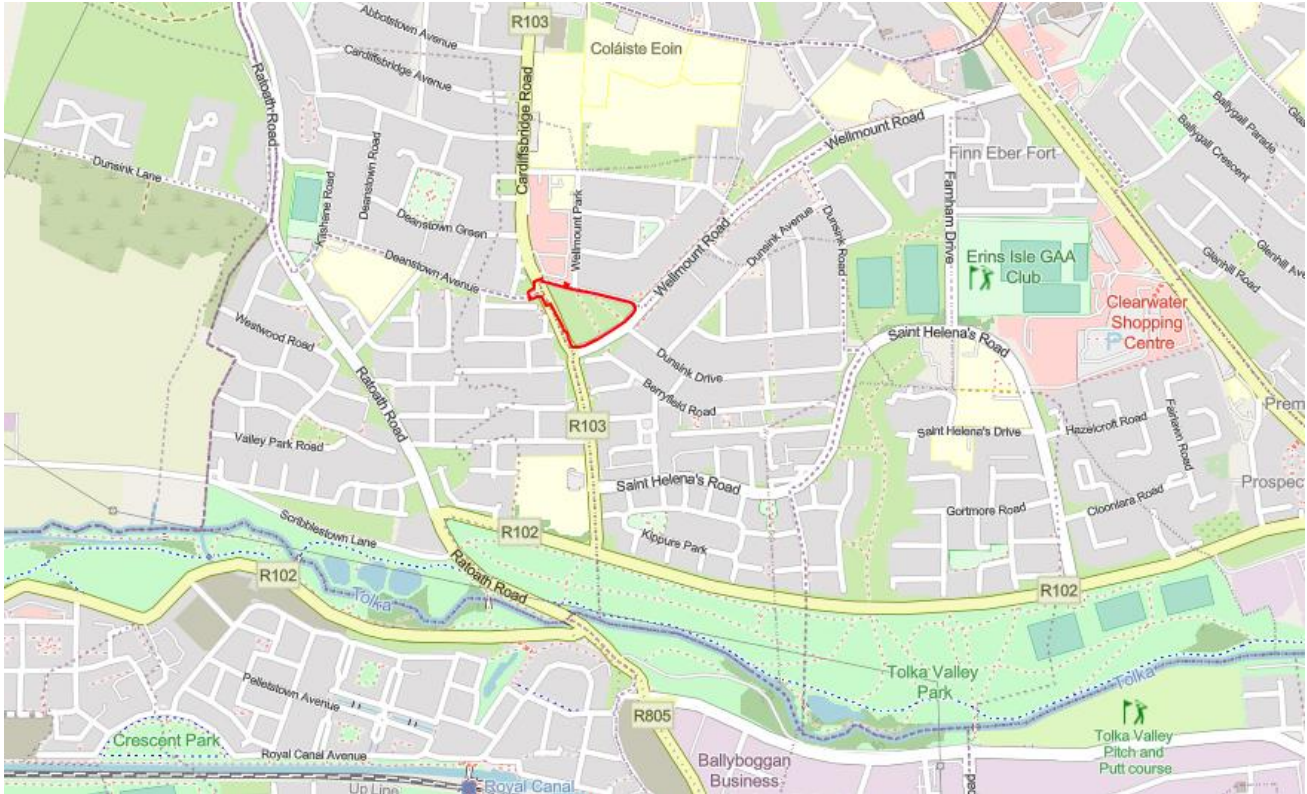
The report is structured as follows:

- 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 bisected in a north-south manner by the R135. The site is located in Finglas West, on an infill site bounded by Wellmount Road, Wellmount Drive and Cardiffsbridge Road. The site is located on a greenfield site which is bound by Wellmount Drive to the north, Wellmount Road to the east / south-east and the Cardiffsbridge Road to the west.



**Figure 1: General Location of the Site**

### 2.2 Site Description

The site is a triangular-shaped greenfield site which is bound on its three sides by the Cardiffsbridge Road, Wellmount Drive and Wellmount Road. The site is c. 1.34 ha and its location is illustrated in the figure below. It consists of a grass field, which slopes from north-west to south east from the intersection of Wellmount Drive and Wellmount Road. There is a small number of trees on the site with some strips of wildflower meadow planted. These are generally located around the edges and are either of low quality or deemed unsuitable for retention. The relative lack of vegetation makes the site quite open and exposed to wind.

Another area of open space is located directly across the site at the corner of Cardiffbridge Road and Deanstown Avenue. The surrounding area is characterised by low-rise, low density single-family dwellings. There is limited to no relationship between the surrounding estates and the greenfield site. The row of houses (no. 25 to 28A) Virginia Park are well removed from the road and are accessed from Virginia Park. No.29 and 6 Virginia Drive do not front Cardiffsbridge Road. No. 2 to 16 Berryfield Road are also somewhat removed from the Wellmount Road. There is an element of natural surveillance provided on Wellmount Road by no. 81 to 87 Wellmount Road.

Wellmount Drive avails of the most natural surveillance with no. 2 to 20 Wellmount Drive directly fronting the site without an excessive setback from the road.

There are a number of streetlights around the site, and several utilities boxes located on the Cardiffsbridge Road side. Several manholes can be found, two along the Cardiffsbridge Road side, one of the Wellmount Road side, one of Wellmount Drive.



**Figure 2: Part 8 application site**

Immediately north of the site is a shopping centre which includes a Dunnes supermarket and a parade of shops. The shopping centre complex is one-storey high. This urban block also includes another few retail units, some of which are vacant and the Wellmount Health Centre.

The site located less than 500 metres (c. 475m) south of another concurrent part 8 site at the former Church of Annunciation on Cardiffsbridge Road. The Tolka Valley Park lies around 565m south of the site. The Church of Annunciation site forms part of a landbank which includes a number of schools: St Brigid's Infant National School, Coláiste Eoin, Coláiste Íde of Further Education and the St Fergals' Boys National School. There is also a leisure centre. The large greenfield adjacent to these is earmarked for the provision of a primary care centre and sports facilities.

## 2.3 Transportation

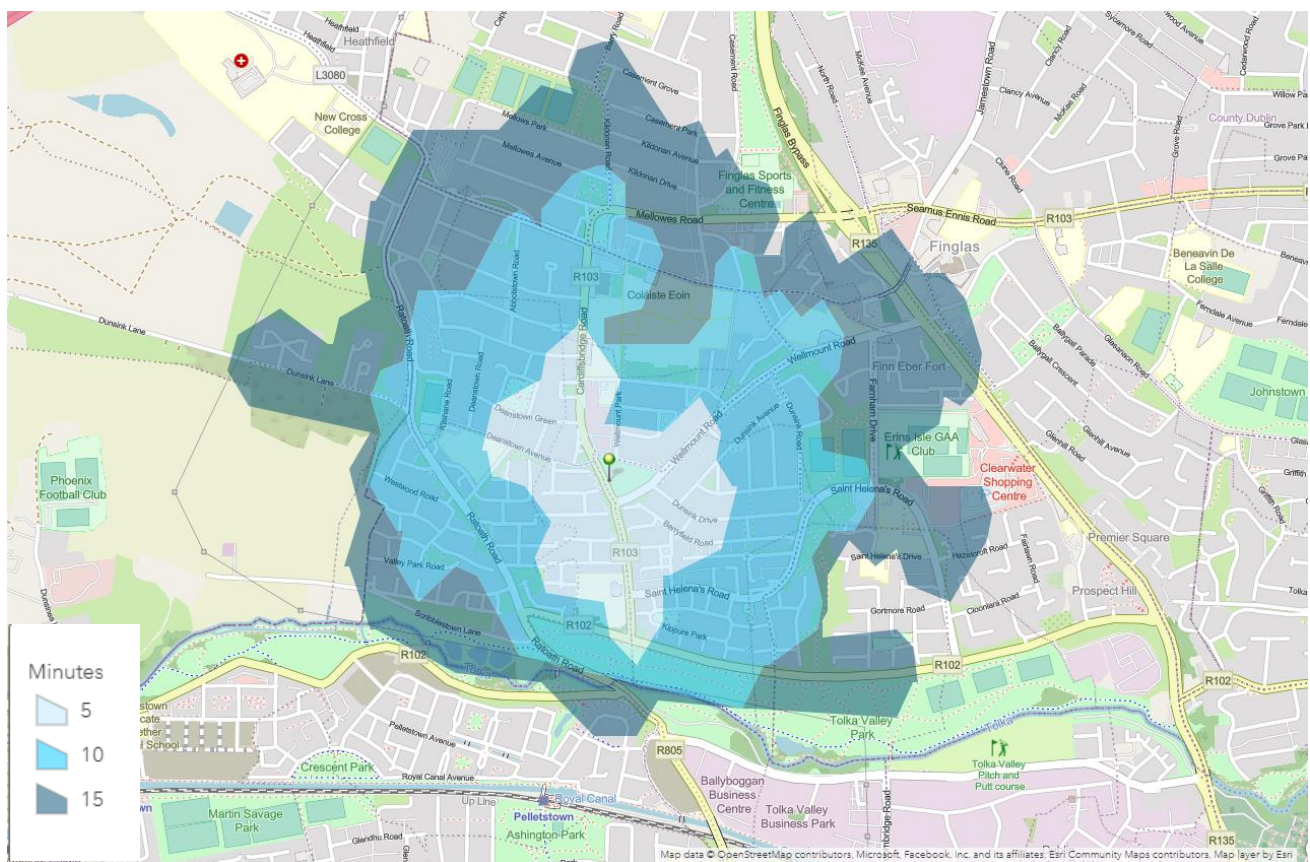
Cardiffsbridge Road (R103) is a significant thoroughfare which links the Tolka Valley Road to the south of Finglas to the Cappagh Road, to the north, which bisects Finglas in an east-west manner. The width of the road along



the site is around 7m. There is a footpath on both sides of the road which is segregated from the carriageway by a planted strip. The site is located c. 6km from the City Centre. The site is served by Cardiffsbridge Road, stop 1587 and Cardiffsbridge Road, stop 1573 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 Earlsfort 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. Another bus stop is located close by on Deanstown Avenue which is served by lines 40E (Broombridge Luas to Tyrrelstown), 220 and 220A (DCU Helix to Parslickstown Avenue). 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. Wellmount Drive is a 30 kph zone and is closed off with bollards at the point where the street meets with Wellmount Park and Dunes.

### 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, which will be expanded upon in this report.



**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. An Bord Pleanála granted planning permission for this route on 12<sup>th</sup> March 2024. 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 Blancharstown-Tyrrelstown- Boombridge is proposed along Cardiffbridge 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.700 meters of the preferred new stop at St Helena’s 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. In addition to BusConnects, Dublin City Council’s Active Travel Network Programme is set to expand the existing network from 10km to 310km across the city. The proposed programme illustrated below demonstrates that the development site will be located in close proximity to high quality active travel infrastructure, which will allow for greater ease of accessibility to social and community infrastructure identified in this report.

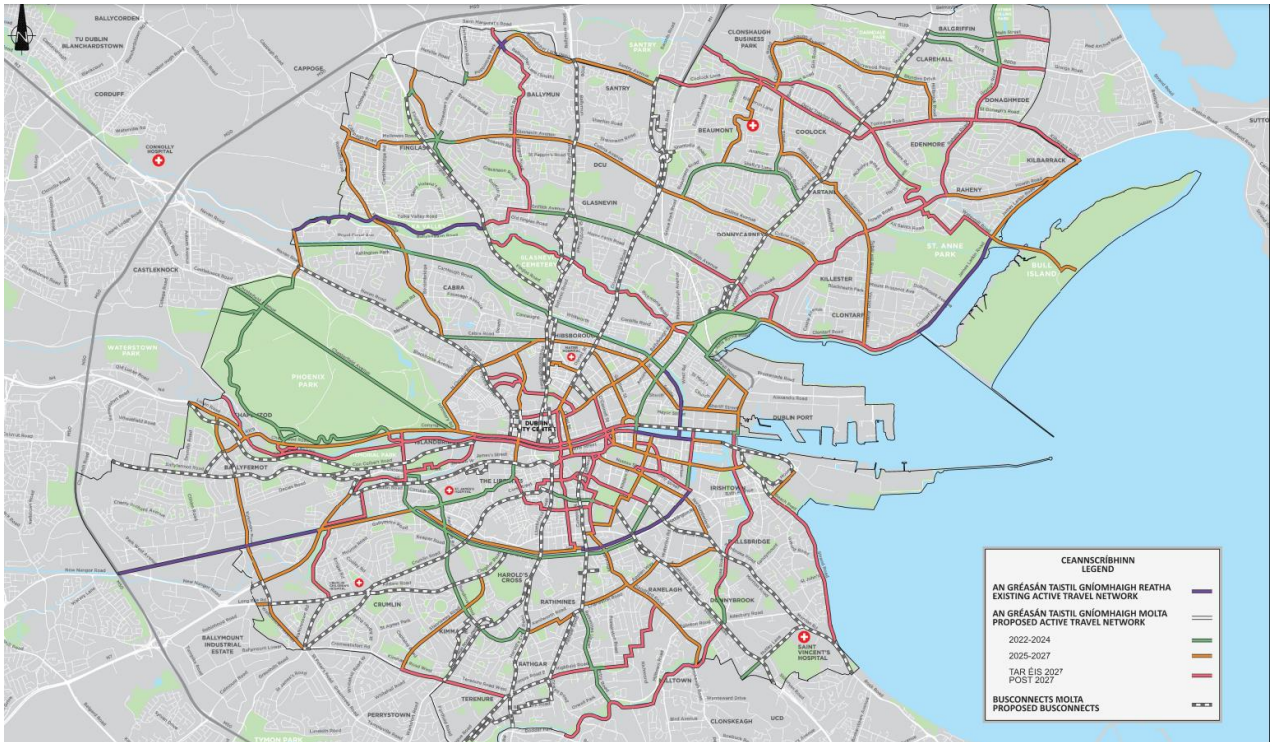


Figure 6: Proposed Active Travel Network Post 2027 (Source: DCC)

### 3. RELEVANT PLANNING HISTORY

#### 3.1 Subject Site

There is no planning history directly on the site.

#### 3.2 Surrounding Area

Given the suburban nature of the surrounding area, there is a wide range planning permissions for extensions and other works and development undertaken at single-family dwellings. These are not considered to be of relevance to the proposed development. In addition, where it may have been considered relevant, it is older than 5 years, meaning it has more than likely expired or been implemented. On this basis, only a few developments have been noted as follows:

PA.Reg.Ref.3877/17: Part 8 development – The construction of 70 apartments units in 2 separate apartment blocks, with 1,620 sqm of public open space, 850 sqm of communal open space. The housing mix includes 19 no. 1-bed, 40 no. 2-bed and 11 no. 3-bed units. The part 8 was approved on the 4<sup>th</sup> December 2017 and has now been constructed.



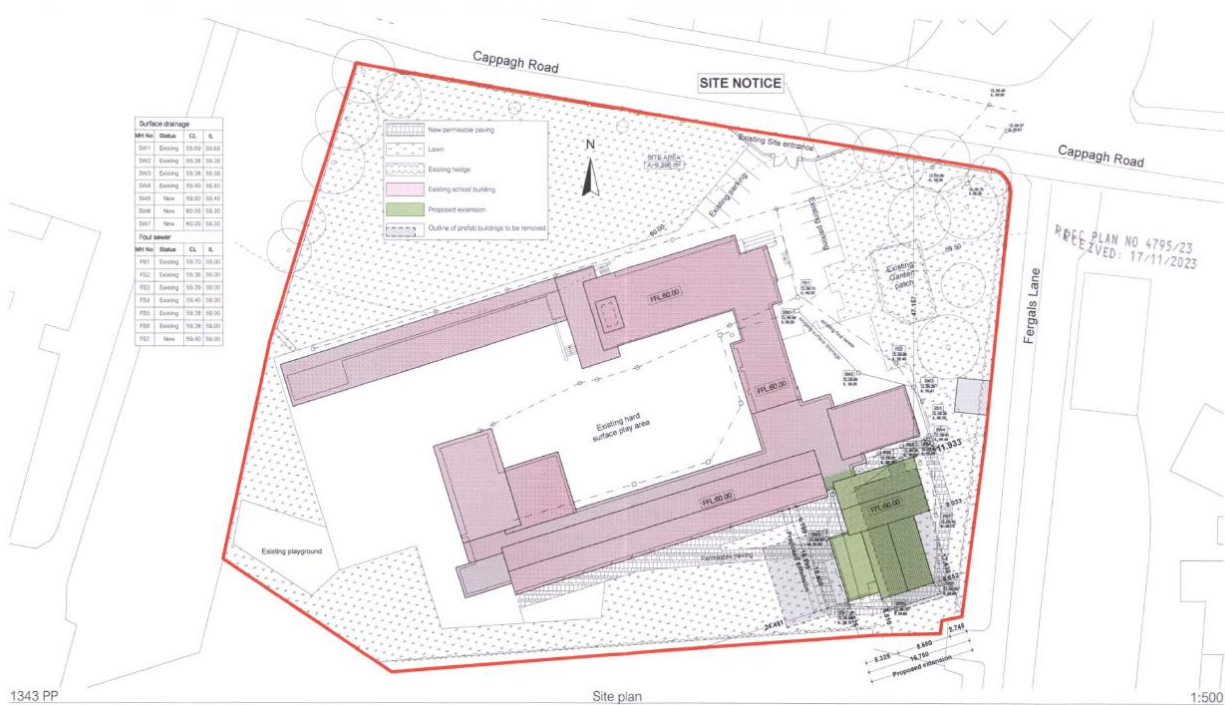
Figure 7: Site Layout (source: Coady Architects as displayed on the Planning Register)

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

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.

PA. Reg. Ref. 4843/23: An application was submitted on 24th November 2023 for the change of use to serve as part time early years service facility for max. 20 children with opening hours of 9am-1pm and as an after school service for max. 20 children with opening hours of 1.30-5pm Monday to Friday at Finglas Celtic Football Club Grounds, Kilshane Road, Finglas, Dublin 11. Further information was requested on 26<sup>th</sup> January 2024 in relation to the ownership of the lands and discrepancies in the drawings submitted. The proposed childcare facility would be located within 500m of the subject application site.

PA.Reg.Ref.4795/23: Planning permission is being 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 17<sup>th</sup> November 2023 and granted permission on 28<sup>th</sup> February 2024.



**Figure 8: Extract of Site Plan submitted as part of PA.Reg.Ref.4795/23 (Source: McGahon Architects as displayed on the DCC planning register)**

In addition, 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'<sup>1</sup>. 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.

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<sup>1</sup> 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.cityofdublinetb.ie%2Fmedia%2FFergals-Field-Development-Project.pdf&usg=AOvVaw3mdBOxkXz5bhmG5n14VqfC&opi=89978449](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKewjmyPnJi_iCAxXHUEEAHRraDfyQFnoECBEQAQ&url=https%3A%2F%2Fwww.cityofdublinetb.ie%2Fmedia%2FFergals-Field-Development-Project.pdf&usg=AOvVaw3mdBOxkXz5bhmG5n14VqfC&opi=89978449)

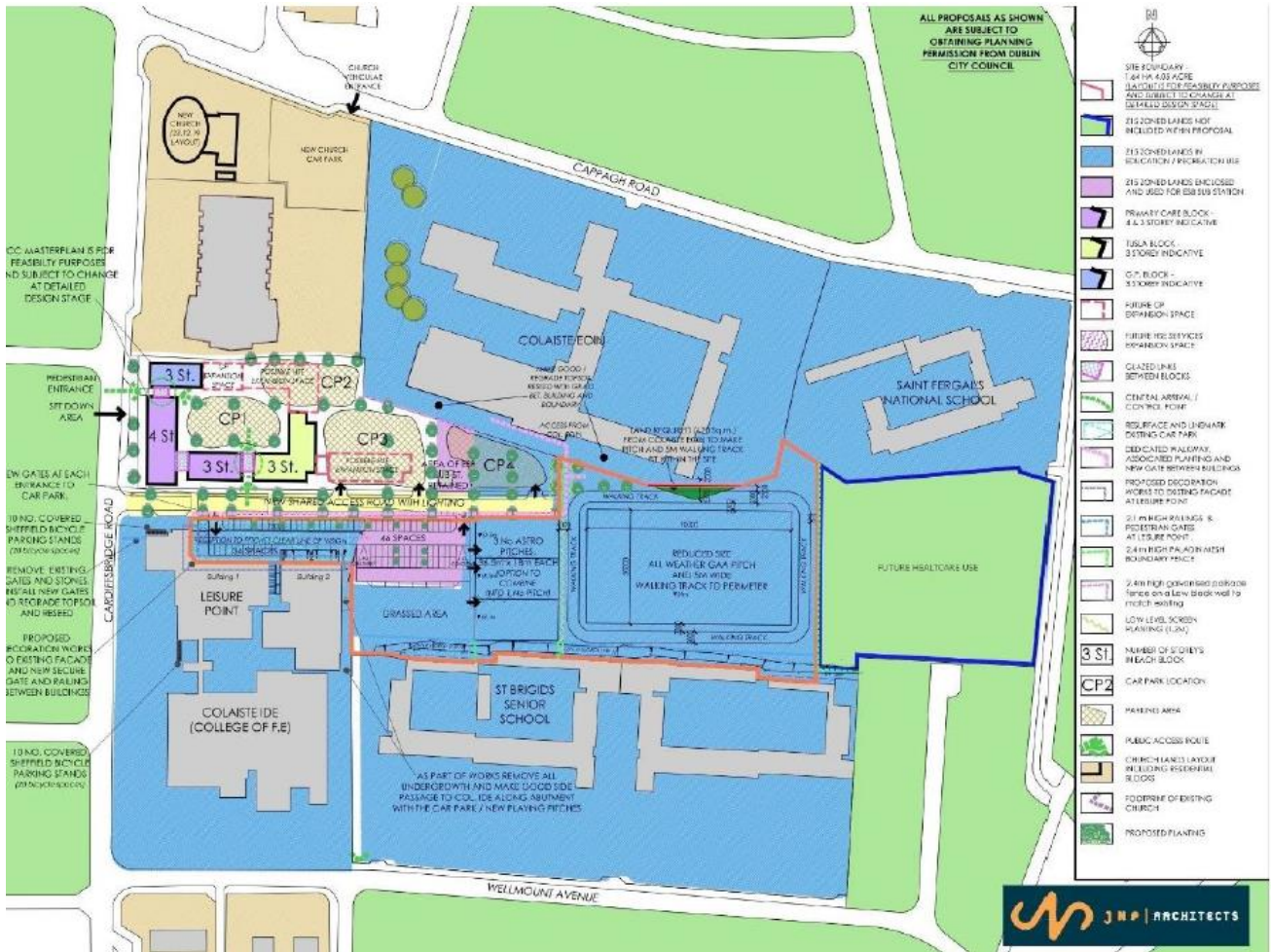


Figure 9: Layout Plan of Final Feasibility of Primary Care Centre and Recreation Facilities (Source: DCC, HSE, CDET, Archdiocese of Dublin)



## 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 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.

The site has been identified as being 'ready and zoned for development', within the Finglas Strategy. The CDP zoned the site Z1 'Sustainable Residential Neighbourhoods', with an element of Z9 'Amenity / Open Space Lands / Green Network (Open Space)'. The site has also been earmarked for development under the guiding principles map of the SDRA 3. 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 Types

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 of the Strategic Development and Regeneration Area (SDRA) for Finglas noted that in the area, 84.6% is made up of houses. The proposed development which includes apartments will contribute to a more varied housing stock. The Finglas Strategy particularly notes that there is a clear need to provide significant number of one-bed and two-bed residential units, given the stock is largely dominated by three-bed units. It further notes that infill housing sites, such as the subject site should be used to address existing deficiencies and imbalances in the housing stock. This is reflected in recommendation H01 which seeks to prioritise the provision of 1 and 2-bed units. The proposed

development includes 38 1-bed (49%) and 25 two-bed units (32%). It will therefore contribute to addressing imbalances in the housing stock.

Just under half of the units proposed at the Wellmount Road site are 1-bed units. The housing stock owned by DCC in the area is currently not reflective of the population composition. The Council principally owns 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 made of 64% of owner-occupiers (with and without mortgage). 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-handedly redress the balance, it will merely increase the share of public housing from 16.8% to 17.4%. If other concurrent part 8 applications in the area are considered, specifically a proposed social housing scheme also being pursued under the Social Housing Bundle 4 at the former Church of Annunciation site, then this percentage rises to 18.2%. 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 part of Dublin City.

### 4.3 Consultation

A public consultation event was held on 28<sup>th</sup> November 2023 in respect of the proposed development. Attendees at the event included DCC Housing Development representatives and Local Area officers. In summary, the following feedback and queries were noted at the public consultation event which will be addressed in this report. Residents noted the following at the public consultation:

- Minimal landscaping and public amenities are preferable in the allocated public open space.
- Minimal areas for seating and opportunities for congregation in the public open space
- Residents noted the green was used for various activities throughout the year and feared they would lose this amenity.
- Residents expressed concern over the height of the development.
- Residents highlighted anti-social behaviour in the area and were concerned this development would further exacerbate anti-social behaviour issues.
- Residents feared they would lose the views they currently avail of to the south if the development proceeded.

In addition to the items raised at the public consultation event, the resident's association also directly contacted Dublin City Council via email and recorded the following items:

- This valuable amenity is zoned Z1 and Z9 and has been developed by parks department and local residents with the planting of trees, wildflower meadows and spring bulb flower beds. 5 Rowan trees were only planted recently.
- There is a biodiversity crisis that is increasing at an alarming rate. The proposal to build on a green space that is visited by a protected species, Brent geese every year, goes against Dublin City Council's objective which is to "Preserve, provide and improve recreational amenities and open space and green networks." It

was noted, an individual has been in contact with bird and wildlife conservation authorities, and they are observing proposals for this area.

- Building on this vital green space would have a detrimental effect on the community and set back social inclusion, biodiversity and valuable ecosystems to mention a few. It is also used by children, dog walkers, elderly for exercise and is a very important space for the community's well-being.
- Disadvantaged areas gain greater benefits from green space than more privileged areas.
- Residents raised concerns regarding the biodiversity of the green space and that they were losing an amenity used by local children and residents.
- Services in the area were already stretched i.e. playgrounds, green space, schools and additional housing on this space would contribute to this.
- Some were strongly opposed to the development at this location.

This report will endeavour to address the items raised by members of the public in relation to the proposed development.

## 5. CONSIDERATION OF DESIGN

Detailed 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 site has particularly taken its cues from its relative open nature and the fact that some parts of the surrounding road network is, for the most part, not overlooked. Due to its elevated nature and to the fact that some of the part 8 site include Z9 zoning, the design sought to avoid impacting on the residential amenities of the surrounding estates, particularly those located at the Virginia estate to the west, which are located lower.

Early analysis of the project brief and the proposed site indicate that the site is larger than required for delivery of the intended brief. This is based on the following analysis:

The provision of 77 dwellings on the total site area of 1.34 ha (inc lands zoned POS) would deliver a site density of 57 uph. Whilst this might be compliant with the key urban village density target (60-150uph), it does not comply with the minimum SDRA density requirement (100-250uph). As agreed with DCC, the proposed development will deliver the landscape proposals for the zoned Z9 lands as part of this subject application. An indicative masterplan has been submitted as part of this development, which illustrates the development potential of the eastern portion of the lands. An exercise has been conducted by SHA to estimate an approximate development capacity on these lands, c. 41 no. additional units in the south-eastern block of lands have been estimated to be accommodated on these lands. This would yield, a total number of 118 units on an overall site area of 1.12 and equate to a density of 105 uph. For the purpose of the net site area subject of this application, a site area of 0.56 is applicable with 77 units proposed, this equates to a density of 138 uph. This is in accordance with the prescribed density of the SDRA 3.

In addition to the above, early analysis indicates that a development of compliant but not excessive density would likely result in a 4-6 storey building. Whilst this is of greater scale than the immediate context, it is within the parameters identified within Chapter 13 of the DCCDP, i.e. that building heights in the range of 3-6 storeys will be encouraged in SDRA 3.

Given the site is 1.34 ha and the proposed development is concentrated to the west, there is further potential to develop the rest of the lands in the future. However, it is not envisaged at present and, in any event, would be subject to formal planning consent. An indicative masterplan has been designed in respect of the proposal to demonstrate that the proposal subject of this application will not impede the potential future development of the residentially zoned lands.

The proposed design is as envisaged under the Dublin City Development Plan 2022-2028, which sought to achieve a key building frontage on the Cardiffsbridge Road. In addition, the Finglas Strategy 2021 had noted the exposed and rear gables of a number of houses around the site. The proposed will allow for the provision of natural surveillance over the area.

The client requirement and project brief was to accommodate 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, a reduction of c.23 units was agreed owing to only part of the site currently being pursued for residential development. The units proposed to accommodate 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.

The construction of 77 apartment dwelling units at a site c.1.34 ha bound by Cardiffsbridge Road, Wellmount Road and Wellmount Drive, Finglas, Dublin 11, which will consist of the following:

- One apartment block with primary frontage onto Cardiffsbridge Road, ranging in height from 4 to 6-storeys, comprising 77 residential units (38 no. 1 bed units, 25 no. 2 bed units and 14 no. 3 bed units);
- 28 no. car parking spaces, 2 no. motorcycle spaces and 1 no. loading bays;
- 175 no. bicycle parking spaces;
- 135 sqm of internal community, arts and cultural floor space;
- 0.56 ha of public open space and 0.11 ha communal open space;
- Two vehicular accesses are proposed, one from Cardiffsbridge Road and one from Wellmount Road;
- Boundary treatments, public lighting, site drainage works, internal roads and footpaths, ESB substation, stores, bin and bicycle storage, plant rooms, landscaping; and
- All ancillary site services and development works above and below ground.



**Figure 10: Proposed Development (Source: Sean Harrington Architects)**

In summary, the proposed development has been designed to provide high quality homes for a range of households. The design of the scheme steps down up from four to six storeys. It will provide a net density of

138 uph on a greenfield site bound by Cardiffsbridge Road, Wellmount Road and Wellmount Drive. The net density for the site has been calculated using a net area of 0.56 ha, excluding the external road network, area zoned open space and the area proposed as public open space under this proposal.

The design has been conceived for the whole site but only the western part is proposed for delivery at this point in time. No timeline is attached to the delivery of the rest of the site. The master planning exercise allows for a more holistic approach to the vision for the site and ensures that the development does not impinge on the development potential of the landbank as a whole.

## 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: 1.34 ha Net site area: 0.56 ha
No. of Residential Units (Apartments)	77 units
Non-residential uses:	135 sqm of community, arts and cultural space
Density	Net density: 138 uph
Plot Ratio	1.554
Site Coverage	30.4%
Dual Aspect	51%
Car Parking Overall	28 spaces
Bicycle Parking	175 spaces
Height	4 to 6 storeys
Public Open Space	0.56 ha
Communal Open Space	0.11 ha

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	3 bed Apartment	Total
No. of units	38	25	14	77
% of Apartments	49.3%	32.5%	18.2%	100%

### 6.3 Design Rationale

In summary, the design rationale for the proposed development entails:

- Proposed building development limited to western side of lands zoned for residential development.
- Building to step in height from 4 storeys to north to 6 storey to south
- North-south permeability through public open space
- Formal urban structure to Cardiffsbridge Road with more informal composition towards public open space and communal open space
- Public open space is provided to the east of the site, to both the lands zoned public open space and to the lands to the south and east
- Communal open space is located between the proposed building and the public open space.

The proposed development will cater for an active street frontage. The proposed development will directly front Cardiffsbridge Road which avails of little natural surveillance, in spite of having one bus stop in the vicinity. The surrounding estates, with the notable exception of Wellmount Drive have no relationship with the road network and are mainly inward facing. This makes the site exposed and lack in a sense of safety. Access to the building itself is mixed with communal accesses provided for the upper floors and own door access for the ground floor units.

The proposed community spaces are located at the northwestern corner of the site. This will allow for activation of the street. The site is adjacent to a neighbourhood centre, yet this centre has no relationship with Cardiffsbridge Road as it is well removed from the road. This provides a misleading sense of width to the road, which can trigger a sense of insecurity to pedestrians as well as entice car speeding. The community space façade will be oriented north which will be important in visually narrowing Cardiffsbridge Road and create activity.

The bulk, scale and massing of the building is such that it will respect the surrounding proposed uses. It is well removed from the existing residential properties to the west and height is stepped along Cardiffsbridge road to account for the site topography

Given the site slopes from north-west to south-east, the development incorporates stepped down heights to avoid being overbearing and monolithic form.

As noted above, the north-western corner was designed to allow for street activation particularly when travelling south. Generally, the road realm from the south of Leisure Point to Tolka Valley Road does not have any natural surveillance with all estates either backing or siding onto the road. Additionally, the area continuously slopes down toward the Tolka Valley meaning, generally the public realm entices speeding. It was therefore crucial to provide continuous direct frontage to Cardiffsbridge Road and to active the street on the site.

## 6.4 Masterplan

Whilst a site masterplan will not be required for reasons of increased density, scale or height on the subject lands, the requirement for phased project delivery introduces a masterplan requirement.

However, given the residential component of the application is confined to the western portion of the site for the purpose of this application, a masterplanning exercise was undertaken by the design team to illustrate that the proposed development would not impede on the future development of the remaining residentially zoned lands. This exercise demonstrated that it is possible to deliver an additional phase of development on the lands, if and when Dublin City Council were minded, that would be subject to future planning consent.

The subject application includes the proposed building adjoining Cardiffsbridge Road, with the communal open space and car parking provisions immediately behind. The proposed public open space provision would also be delivered under this subject application, to ensure project compliance with POS requirements. The buildings fronting Wellmount Road would potentially be delivered in a later phase, along with associated communal open space and carparking. However, such lands will be laid out as a continuation of the public open space in the short term, so that the development reads as being reasonably complete on delivery of the proposed development.



**Figure 11: Indicative Masterplan Prepared for the Site (Source: SHA)**

A masterplan assessment criteria is included in Appendix 3 to the DCCDP, and whilst this is intended for justification of development of increased height, scale or density, we propose to follow the Appendix 3 masterplan criteria, under the headings below:



**Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale**

Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
<p>To promote development with a sense of place and character</p>	<p>The masterplan proposal presents a strong urban form from Cardiffbridge Road and Wellmount Road. Whilst the proposal is taller than adjacent surrounding low-rise housing, the proposed height and scale are not excessive. A circa 3-5m setback from the site boundary provides for the necessary entrance thresholds and privacy buffers, without losing a sense of enclosure to the adjacent streetscape.</p> <p>The scale and arrangement of the masterplan proposal, as a contrast to the predominantly low-rise housing adjacent, creates a distinctive design, with a sense of place. The proposal also assists to provide some enclosure to the proposed new public open space to the centre of the site, whilst maintaining a north-south thorough the site and the POS.</p> <p>Proposed buildings step in height from north to south, with the tallest elements at the south western site corner. The building facade line is also proposed to step, to accommodate private and/or communal open space. Both design features ensure that the building does not appear overly long or monolithic.</p>
<p>To provide appropriate legibility</p>	<p>The proposal for the tallest building element at the south western corner of the site, coincides with the junction of Wellmount Road and Cardiffbridge Road. This junction of two local distributor roads is therefore marked by a distinctive urban form, that is legible from distance on the approach from Tolka Valley Park to the south.</p> <p>In addition to providing a north-south pedestrian link through the site, and access to the new public open space from the south, the permeability provides to service the site, providing access to carparking and communal open space behind the building line.</p>
<p>To provide appropriate continuity and enclosure of streets and spaces</p>	<p>Existing housing adjacent to the subject site, both along Wellmount Road and Cardiffbridge Road is arranged sporadically, with significant setbacks and often with blank gable frontages fronting adjacent roads. This lack of formal arrangement, significant set-back and poor definition of street edge leads to no real definition of the street edge.</p> <p>The masterplan proposal serves to provide a much more clearly defined building line, of increased height ranging from 4-6 stories. In addition, it is proposed that the proposed buildings will feature active frontage to adjacent streets, with own doors ground floor units, entrances to common stair cores, and windows from apartments on all floors overlooking and animating the streetscape.</p>
<p>To provide well connected, high quality and active</p>	<p>Whilst carparking is provided for residents, the masterplan proposal will prioritise the needs of cyclists and pedestrians. To this end, well overlooked and secure cycle storage facilities are proposed, largely integrated within the proposed building footprint. Car</p>

Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
<p>public and communal spaces</p>	<p>parking is provided behind the building line at the north and south extremities of the site, which allows for a generous communal open space within the heart of the site.</p> <p>The low rise nature of the existing context, and it's setback from the subject site means that there is little or no existing overshadowing. Furthermore, the arrangement of proposed blocks, predominantly on a north-south axis, ensures adequate potential for sunlight access to the communal and public open spaces within the subject masterplan proposal.</p> <p>Whilst there is a reasonable fall across the site of circa 3.5m (north to south), this is over a circa 100m distance, ensuring that level or gently sloped access within the site is viable.</p>
<p>To provide high quality, attractive and useable private spaces</p>	<p>At ground floor level, it is not proposed to provide any private open space directly towards the adjacent road frontage, and instead dual aspect ground floor units will feature private open space behind the building line.</p> <p>All apartments will receive generous window openings to all rooms, for passive surveillance of surrounding public space, and to ensure adequate daylight and sunlight provision to residential units.</p>
<p>To promote mix of use and diversity of activities</p>	<p>In compliance with the requirements of the SDRA, community, arts and cultural facilities from part of the brief, with the provision of 2.5% of space allocated at this subject application, while the remaining 2.5% space has been allocated to a nearby concurrent Part 8 application at the former Church of Annunciation site. A mix of dwelling typologies are proposed, with one, two and three bedroom units provided. Furthermore, a minimum provision of 25% of units will be to Universal Design standards, which will allow for such apartments to be more easily adapted as the needs of resident's changes at different stages of their life.</p> <p>This range of dwelling typologies, in addition to the provision of community amenities will contribute positively to the formation of a sustainable urban neighbourhood.</p>
<p>To ensure high quality and environmentally sustainable buildings</p>	<p>The relative openness of the subject site and the lack of any overshadowing from adjacent dwellings ensures optimal access to sunlight and daylight. The site has been assessed to be outside the range of particular noise sources such as airports and primary roads and motorways.</p> <p>The proposed masterplan design allows for the inclusion of dual aspect units, in particular at ground level, at building corners, and at steps in the proposed building. As part of proposed sustainable design features, nature based SUDs solutions are proposed, to include green and blue roofs, and SUDs measures within the communal courtyard.</p>

Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
To secure sustainable density, intensity at locations of high accessibility	The masterplan proposal is served by a bus route on the adjacent Cardiffsbridge Road, with a bus-stop along the site frontage. There are other public transport links within the immediate vicinity of the site, including complementary local bus routes at Cappagh Road to the north, and interurban bus-routes on the Finglas bypass to the east.
To protect historic environments from insensitive development	<p>The existing context of Finglas West is predominantly low-rise, 2-storey housing, as developed by Dublin Corporation through the 1950's and onwards.</p> <p>The Finglas West community was developed from the 1950s onwards. Built on former agricultural lands, Finglas West formed part of the suburban expansion of Dublin City. The predominant building typology is 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 of Finglas West, there are very few protected structures of architectural significance within the wider Finglas area.</p>
To ensure appropriate management and maintenance	Leading from a masterplan proposal for the subject site, and development proposal will feature a suitable strategy for operational waste management, and lifecycle management.

## 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 135 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 in the area, which includes a health centre and convenience retail combined with good public transport facilities and multiple schools in close proximity, the provision of 77 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 for homes that includes 22 no. universally designed units.

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 is located in the Strategic Development and Regeneration Area (SDRA) 3 Finglas which has been earmarked for significant regeneration in the Dublin City Development Plan (CDP) 2022-2028. It is therefore considered that the development would support NPO 35 insofar as it has been considered as part the area-based regeneration of Finglas.

In summary, the proposed development is on zoned lands close to schools, 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 <sub>2</sub> eq)	2030 KPI	2030 abatement (vs 2018 MtCO <sub>2</sub> 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 77 units, 38 of which are one-bed units falls below the 75-unit threshold set out by the Childcare Facilities Guidelines for Planning Authorities (2001). Having regard to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2023, 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, 39 units may generally require childcare in the proposed development.

A Social Infrastructure Audit was prepared by MacCabe Durney Barnes and accompanies the part 8 application. The Dublin Childcare Committee was consulted which identified childcare providers within a 1 km radius. This audit considers that the development could generate an indicative childcare need for 13 children. The assessment also note that by using the 2022 Census data almost 150,000 children of pre-school age (0-4 years old) were in childcare in Dublin City. Of this, 60% of these were in a creche or similar facility in 2022 (CSO, 2022). Applying this percentage to the number of children of pre-school generated from the proposed development, this would yield a demand for 8 spaces. The assessment therefore uses this share as a demand benchmark. The SIA was mindful to consider that the percentage was likely conservative and may not be entirely too reflective of the situation of social tenants. These variants would translate as follows:

- 13 children may require childcare facility.
- If 60% of them require a space, this would translate to 8 children;

In any event, none of the aforementioned figures would give rise to the need to provide a dedicated childcare facility. Under the NDFA Social Housing Bundle 5, the design process is underway for a residential development at Barry Road, Finglas, which would include a creche with capacity of 56 no. spaces. In addition, another proposed creche facility has been identified under PA. Reg. Ref. 4843/23. The proposed application consists of a change of use to serve as part time early years service facility for max. 20 children with opening hours of 9am-1pm and as an after school service for max. 20 children with opening hours of 1.30-5pm Monday to Friday at Finglas Celtic Football Club Grounds, Kilshane Road, Finglas, Dublin 11. The proposed childcare facility would be located within 500m of the subject application site. It is submitted that the marginal increase in demand for childcare spaces in the Finglas area can be absorbed within existing and planned facilities.

### 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 greenfield site. The site is currently underused as an informal open space., as it was not planned to act as an open space, it did not avail of significant landscaping. The area specifically earmarked for public open space will avail of high-quality landscaping.

The proposed development has been designed to face the Cardiffsbridge Road and regain some control over the road realm. The site and this particular area of Finglas is poorly overlooked with many rear or side gables and limited to no overlooking onto Cardiffsbridge Road and Wellmount Road. The building will directly front the street, enticing lower speed. The site and area are currently very open and exposed. The development will allow for activity on the site, with increased pedestrian movements. It will also give a more focussed aspect to the area, creating a sense of place and giving a heightened sense of security and safety to existing and prospective residents. This particularly important, as currently no units are of such height or in such location that it can adequately cater for natural surveillance over the area.

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 possible value of 3 m<sup>3</sup>/m<sup>2</sup>/hr1. The development will use energy efficient technologies to reduce its reliance on fuel and electricity demand. 38 of the 77 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. It is already reiterated that 22 of the units have been designed to universal design standards.

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.

### 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.*

In accordance with table 1 of Appendix B, for the purpose of calculating the net density on site, this excludes the proposed public open space provision and external road network. The proposed public open space provision includes lands zoned Z9, it is therefore expected to serve a wider catchment than just the site and are deemed to be open spaces serving the wider area. The remainder Z1 zoned land proposed as public open space, is also deemed to fall under this definition. This results in a net area of 0.56 ha and generates a net residential density of 138 uph (77 units/0.56 ha = 138 uph). The proposed density accords with the recommended density range between 40-250 uph in City-Urban Neighbourhood locations.

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 net density is 138 uph. The density also aligns with Table 1 to Appendix 1 of the Development Plan which sets out a density range of 100-250 uph for SDRA's. The proposed density therefore accords with the Dublin City Development Plan 2022-2028 and the Sustainable Residential Development and Compact Growth 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. A Quality Audit Report has been produced by ORS, which includes a Road Safety Audit, Cycle Audit, and an Accessibility Audit. The Quality Audit assessed the proposed layouts supplied by the Design Team and made a number of recommendations in line with guidance such as DMURS.

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 prepared by Sean Harrington Architects responding to the 4 criteria above has been prepared and accompanies the documentation. The response to the criteria is summarised below.

**Table 4: Summary of Design Statement Response to the Specific Criteria**

No.	Topic	Response
<b>1</b>	<b>Sustainable and Efficient Movement</b>	
<b>(i)</b>	permeable and legible network of streets and spaces within the site	<p>The development proposed a high quality urban development on a greenfield site. As indicated in the SDRA guiding principles for the development of the site, a north south pedestrian link has been proposed which will enable permeability through the site. The application site is bounded by Wellmount Drive to the north, Wellmount Road to the east / south-east and the Cardiffsbridge Road to the west. The proposal includes active street uses along Cardiffsbridge Road.</p> <p>The site avails of good public transport connectivity, with Dublin Bus stops on Cardiffsbridge Road immediately adjacent.</p>
<b>(ii)</b>	connections with and between established communities, services and other uses	<p>The proposed development is located within an established neighbourhood of Finglas, it is noted that the site is regularly utilised by residents in proximity to the site for a range of activities. The proposal has sought to deliver a high quality residential development on the western portion of the site while also enhancing the public open space provision at the site to serve a range of uses and activities for members of the public and residents of the respective scheme.</p> <p>The site is located c.200 m from the neighbourhood retail centre of Wellmount Avenue/ Cardiffsbridge Road and c.600m from the Cardiffsbridge Road neighbourhood centre. A range of services and amenities are accessible to residents at these locations. In addition, the site is located 1km from the Finglas Village centre which includes core services such as retail, banking and entertainment uses. The SIA accompanying this application also highlights the number of community facilities proximate to the site that cater for a wide array of services and activities.</p>
<b>(iii)</b>	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> <p>Vehicular access to the site is therefore for carparking and service vehicles only, and this is restricted to the north west corner and southern boundaries of the site.</p> <p>The majority of the site therefore is restricted to pedestrians. Primary access to all apartments is directly off the footpath along Cardiffsbridge Road, either directly to the stairwell of each of the 4 no. blocks, or to the front curtilage of those apartments that feature own door access. Otherwise, footways lead from the public pavement on Cardiffsbridge Road and Wellmount Road, past the carparking areas and into the communal open space to the east of the proposed building.</p>

No.	Topic	Response
<b>(iv)</b>	quantum of parking been minimised	<p>As per the Development Plan, the site is located within parking zone 2 due to its location along key transport routes. Based on the objective to deliver general needs housing at this site the maximum car parking standards are 1 per dwelling. However, for the proposed development, with an analysis of particular need and on account of close proximity to public transport, a car parking ratio of 0.36 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 2 no. modest surface level carparking areas to the north west corner and southern boundaries of the site. Each parking area benefits from a high degree of passive surveillance, both from the adjacent road and from the proposed building. Although the carpark areas are modest in size, they are screened by perimeter walls and railings, trees and soft landscaping, all of which serve to minimise their visual impact. Pedestrian and cycle access to all residences is provided by direct footpath access to the communal open space, independent of the car parking areas.</p> <p>Bicycle stores are in the form of secure indoor rooms within the ground floor of the main building envelope with good lighting and secure access, directly from the communal open space. Visitor bicycle parking in the public realm is well overlooked from apartments above.</p>
<b>2</b>	<b>Mix of Land Uses (Vibrant Centres and Communities)</b>	
<b>(i)</b>	mix and intensity of land uses appropriate to the site	<p>The primary brief for this site is derived from the Development Plan, specifically the SDRA 3 guiding principles outlined for Finglas. This expressly identifies that the site is to be used for housing. Furthermore, the Development Plan zoning maps further define the area of the site to be used for Sustainable Residential Neighbourhoods (Z1) and that to be used for Z9 Open Space/ Amenity/ Green Infrastructure (Z9). 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>
<b>(ii)</b>	diverse and varied range of housing types	<p>The proposed development is to provide general needs housing. The resultant mix of housing types is based on a Housing Needs Demand Assessment of the wider Finglas area. The resultant mix of 1, 2 and 3 bed apartments provide for those needs.</p> <p>Furthermore, in compliance with DCCDP, in excess of 25% of the apartments have been designed in accordance with Universal Design Principles.</p> <p>The Community, Arts and Cultural space included in the scheme are intended to reflect current most viable uses, but these uses will be able to evolve and change over time.</p> <p>Please refer to Section 11 (Accessibility) for further details.</p>
<b>(iii)</b>	support the regeneration and revitalisation of an existing centre or neighbourhood	<p>The subject development is regenerative for the wider community, in that it revitalises a current underutilised site, and serves to provide housing. The housing as developed will then provide homes for families and individuals who have a housing need, and have expressed an interest to live in the community.</p> <p>In addition to the proposed housing, a Community, Arts and Cultural facility is also proposed as part of the development. Whilst the final use of this space is currently</p>

No.	Topic	Response
		unknown, it is intended that its purpose will reflect the needs of the wider community. Furthermore, a new high quality public open space is provided as part of the development, for the benefit of the wider community.
<b>(iv)</b>	enhancement of the public realm	<p>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 northern site boundary, fronting Wellmount Drive, placing it in close proximity to the adjacent retail development on Cardiffsbridge Road. Furthermore, a new pedestrian link provides to connect the retail development with Wellmount Road to the south, via the proposed new POS.</p> <p>In addition, the proposed development will bring some improvement to the streetscape along the 3 surrounding roads in the form of new railings, tree planting, and improvements to pavements. The development also allows for the provision of greater permeability of the site, with improved linkages between Wellmount Road and Wellmount Drive.</p>
<b>3</b>	<b>Green and Blue Infrastructure (Open Space, Landscape and Heritage)</b>	
<b>(i)</b>	positively responded to natural features & landscape character	<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 current site is an underutilised, open and windswept green space. The site features sparse planting, limited to a number of small sapling trees of varying quality. Some of these will be removed to provide for the development, and others will be retained. The main landscape feature is the site elevated, south facing slope, with distant views over the city and to the Dublin and Wicklow Mountain beyond. The proposed development strives to ensure that such views will not be lost.</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>
<b>(ii)</b>	A complementary and interconnected range of open spaces, corridors and planted/landscaped areas	<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&amp;3 bed 2-storey family dwellings.</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 presents a confident new urban edge to Cardiffsbridge Road, whilst forming a backdrop to the developed public open space.</p>

No.	Topic	Response
(iii)	public open spaces universally accessible and designed to cater for a range of active and passive recreational uses	<p>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).</p> <p>Based on the above requirement, the minimum provision of UD apartments would be 25%. The proposed development has 29% 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 1B2P apartments will be in excess of minimum size standards, and 61% of apartments in total.</p> <p>The delivery of 61% 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 58%) 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.</p>
(iv)	integrated nature-based solutions for the management of urban drainage	<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 tree pits, green roofs, blue roofs, rain gardens, filter drains, detention basin and permeable paving.</p>
<b>4 Responsive Built Form</b>		
(i)	coherent and legible urban structure in terms of block layouts and building heights	<p>The SDRA requirements for a density in excess of 100uph will result in a significantly more dense development than that of adjacent housing (at c. 25-30uph). 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 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 effectively on an infill site, straddling a community of 2-storey dwellings to the west, and south, and community and retail facilities to the north. The height parameters of the neighbouring context must be understood, but cannot determine a suitable height strategy for the proposed development site.</p> <p>The proposed building avails of the sloping nature of the site to rise in height gradually from 4-stories at the north to a climax of 6 stories at the south. Whilst this is of greater scale than the immediate context, it is within the parameters identified within Chapter 13 of the DCCDP, i.e. that building heights in the range of 3-6 stories will be encouraged. As the existing dwellings on the opposite side of Cardiffsbridge Road do not form any notable urban street edge, the increased height and formal</p>

No.	Topic	Response
		<p>alignment of the proposed building on the subject site provides clarity and definition to the existing streetscape.</p> <p>The building composition to Cardiffsbridge Road is ordered, with repetition in facade treatments and level changes between adjacent blocks. Regular steps in the building height are complemented by steps in the building facade line, to provide visual interest and variety. Changes of material and parapet height are used to bring clarity to the facades of each block, all of which serves to ensure that the relatively long building does not appear monolithic. Furthermore, as the projecting facade elements facing Cardiffsbridge Road are otherwise recessed at ground floor level, and supported on columns, this helps to define the building entrance, and offers canopy cover.</p>
<b>(ii)</b>	buildings address streets and spaces	<p>The proposed new building frontage to Cardiffsbridge Road follows best practice urban design principles. At ground floor level, the public side of the building is presented to the street, with entrance doors to each stair core, and own door approaches with private front curtilages to ground floor apartments. Any ground floor windows are set back from the street with generous privacy strips or curtilages. The proposed development will bring further improvement to the streetscape along Cardiffsbridge Road, in the form of new railings, tree planting, and improvements to pavements.</p> <p>The opposite east facing side of the building overlooks the communal open space, and the public open space further beyond. All publicly accessible spaces, including perimeter streets, and the public open space are overlooked by multiple apartment windows, patio doors and balconies, creating strong opportunities for passive surveillance. The public open space is also well overlooked by existing housing along Wellmount Road and Wellmount Drive.</p> <p>The proposed 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>
<b>(iii)</b>	layout, scale and design features of new development respond to prevailing development patterns (where relevant)	<p>It is noted that proposed development is of an increased scale and density relative to adjacent low-rise, 2-storey housing, which could give rise to the potential for overbearance. However, the set-back of the western and southern edges of the proposed development to relative to adjacent dwellings, means that there is c. 40-50m between opposing elevations across Cardiffsbridge Road and Wellmount Road. This is significantly in excess of 22m, which is a minimum back-to-back privacy dimension as traditionally provided for in low-rise developments.</p> <p>Furthermore, the set-back of the western and southern edges of the proposed development from adjacent structures has been analysed for impact of daylight and sunlight amenity, with the conclusion that the subject development will not cause a negative effect for adjacent residences. This analysis, in addition to the generous offset dimensions has assisted in arriving at an appropriate height for the proposed development ranging from 4 to 6 storeys.</p> <p>This report is included elsewhere as part of this planning application.</p>

No.	Topic	Response
(iv)	coherent architectural and urban design strategy	<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&amp;3 bed 2-storey family dwellings.</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 presents a confident new urban edge to Cardiffsbridge Road, whilst forming a backdrop to the developed public open space.</p>

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.

**Table 5: Sustainable and Compact Settlement Guidelines SPPRs**

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	<p><b>Separation Distances</b></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 development consists of 1 single block and does not give rise to any separation distance between adjoining properties opposing windows of less than 16m. Given the separation distance is c.35m to the nearest property, the proposed development is considered to be in compliance</p>
<b>SPPR 3</b>	<p><b>Minimum Private Open Space Standards for Houses</b></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>
<b>SPPR 3</b>	<p><b>Car Parking</b></p>	<p>Car parking in the scheme has been minimised to 28 spaces overall (including 2 no. Part M</p>

SPPR No.	Summary	Development Compliance
	<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>spaces). This entails a ratio of 0.36 spaces per dwelling unit. The development accords with the need for car parking provision to be minimised noting the accessibility of the site.</p> <p>The site is located adjacent to the Bus Connects F-Spine serving Finglas-City Centre-Kimmage which was granted planning permission for this route on 12th March 2024. The site will also be located c. 700m from the preferred new Luas stop route at St Helena’s. The site is currently well served by a number of bus routes including Dublin Bus no. 40 and 40E routes and Goahead Bus Service Bus no. 220.</p>
<b>SPPR 4</b>	<p><b>Cycle Parking and Storage</b></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 applied. Visitor cycle parking should also be provided.</p>	<p>A total of 175 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. The proposed development is also in accordance with SPPR 4 which requires a general minimum standard of 1 cycle storage space per bedroom and visitor cycle parking is also provided.</p>

**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.*

As per Section 15.8.6 Public Open Space (POS), the public open space requirement for residential developments shall be 10% of the overall site area as public open space. The masterplan proposals as presented at Section 4.0 have been presented to DCC Planning Department, to rationalise an overall approach to delivery of POS for the subject site. The overall approach as proposed, and subsequently agreed with DCC Planning is to deliver the Z9 lands and the Phase 2 lands as public open space as part of this Part 8 Planning application.

In this regard, the Z9 zoned area will amount to 0.263 ha or 23.5% public open space. In addition, the inclusion of the residentially zoned lands referred to as phase 2 lands is calculated into the overall public open space figures, which would result in an area of 0.546 ha or 50.4% public open space. The proposed public open space



provision is in excess of the minimum public open space required at the site. A summary of the public open space provision at the site is outlined below:

**Table 6: Summary of POS Provision**

POS Provision	Ha	%
<b>Net development site area including POS</b>	1.120	100%
<b>Z9 Zoned POS area</b>	0.263	23.5%
<b>Z9 POS area &amp; Phase 2 Area</b>	0.564	50.4%

### 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.

Compliance with the requirements of DMURS can be found in the report Traffic and Mobility Management Plan prepared by Malone O'Regan. The internal road network within the development will have a carriageway width of 6m and a minimum 1.8m 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 refuse truck and fire engine to access from the existing main road only. A visibility splay has been designed in accordance with DMURS.

### 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.

**Table 7: Apartment Guidelines SPPRs**

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	Mix of units to include: - Up to 50% one-bed or studio type units; - No more than 20-25% of the total proposed development as studios; - No minimum requirements for 3-bed.	The proposed development includes 77 units, of which 38 are 1-bed (49.4%), 25 are 2-bed (32.4%) and 14 are 3-bed (18.2%). The development complies with SPPR1 of the Apartment Guidelines. Furthermore, the proposed mix is justified with regard to housing need and section 15.9 of the Development Plan standards.
<b>SPPR 3</b>	Minimum Apartment Floor Areas <ul style="list-style-type: none"> <li>Studio apartment (1 person) - 37 sq.m</li> </ul>	Please refer to the drawings submitted and Housing Quality Assessment (HQA) and which demonstrates compliance.

SPPR No.	Summary	Development Compliance
	<ul style="list-style-type: none"> <li>• 1-bedroom apartment (2 persons) - 45 sq.m</li> <li>• 2-bedroom apartment (3 persons) - 63 sq.m (subject to a max of 10% of overall units)</li> <li>• 2-bedroom apartments (4 persons) – 73 sqm</li> <li>• 3 bedroom apartments – 90 sqm</li> </ul>	<p>All units meet the floor area requirement. 61% (47 units) exceed this requirement by 10%.</p>
<b>SPPR 4</b>	<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>	<p>Having regard to the site’s location, (ii) is applicable to the site. 39 of the apartment units are dual aspects (51%). The proposed development therefore accords with SPPR4.</p>
<b>SPPR 5</b>	<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>	<p>The proposed floor to ceiling height are consistent with SPPR5 of the Apartment Guidelines. The ground floor units have a minimum 2.85 m floor to ceiling height, and the upper floors have a floor to ceiling height of 2.6m.</p>
<b>SPPR 6</b>	<p>Apartments per core</p> <p>A maximum of 12 apartments per floor per core may be provided in apartment schemes.</p>	<p>The proposed development complies with SPPR6. There are four cores in the block. Typically, 4 apartments per floor per core, with 5 no. to the southern most block.</p>

***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 (2020) (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.

### Private Open Space

All units have been provided either with private balconies or ground floor terraces. All private amenity spaces meet or exceed the required minimum floor area requirements set out in Appendix 1 of the apartment guidelines.

### Communal Open Space

Appendix 1 of the Design Standards for New Apartments sets out minimum requirements for communal open space.

**Table 8: Minimum Requirements for communal amenity space**

Unit types	Sqm required	No. of Units	Total required (Sqm)
<b>1-bed</b>	5	38	190
<b>2-bed (3 persons)</b>	6	0	0
<b>2-bed (4 persons)</b>	7	25	175
<b>3-bed</b>	9	14	126
<b>Total</b>		77	491

Based on the number of units proposed, a total of 491 sqm is required. The proposal includes c. 1100 sqm of communal open space. The proposed development therefore exceeds the standard requirement. The proposed communal open space is provided for the apartments to the east of the building.

### 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 with section 3.8 of the Apartment Guidelines as the majority of all apartments exceed the minimum floor area standard for any combination of the unit types by a minimum of 10%. In this case 47 units, which equates to 61% exceed this requirement.

### Play areas

The Apartment Guidelines 2023 indicate minimum requirements for play areas of schemes of a certain sizes. The proposed development includes 38 no. 1- bed units but also includes 25 no. 2-bed units and 14 no. 3-bed units or a total of 39 units 2 or more bed. As a result, the guidelines requirements applying to schemes greater than 25 units of providing 85 to 100 sqm for toddlers and children aged up to six should be complied with.

The communal open space is adjacent to the proposed building, and is divided into terraced areas. The amenity spaces provided are family oriented and will provide a safe and accessible play area and natural play area for a younger age group. Those play areas will be accessible and enclosed with planting to give off a sense of security. The formal play area will also be fenced for safety. Mounded play features in the natural play area will be enhanced with play equipment (slides, stepping stones, logs, climbing wall, etc.). Trees will be provided to increase the playfulness of the mounds. Seating opportunities will be provided in the different areas of the communal open space. Benches and board game tables are proposed as well for all age groups.

As the scheme does not include 100 or more units with two or more bedrooms, a larger play area is not required.

### 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 130 long-stay spaces to serve the development.

134 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 also in excess of the CDP standards of 1 space per unit.

In relation to short stay cycle parking, the guidelines would give rise to a requirement of 38.5 spaces. The proposed development includes 41 spaces and therefore meets the requirement. Short stay parking is provided in the public realm and is well overlooked by the apartment units.

It is important to note here that the cycle parking provision in the Apartment Guidelines 2023 are not SPPRs where they are mandatory. 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 and the location is adjacent to high quality bus transport. Bicycle parking provision has also been allocated to the community, cultural and arts space and accords with the provisions of the development plan.

### 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 1587 which is served by Dublin Bus's lines 40 (Earlsfort Terrace) and 40E (Broombridge Luas) and Goahead Bus' lines 220 (DCU Helix) and 220A (Lady's Well Road), with other services provided across the road at Deanstown Avenue. In addition, the part 8 site would be located within 800 m of the Finglas Village Stop to be located on the preferred Luas Finglas extension route.

28 no. car parking spaces are provided within the site, which equates to a car parking ratio of 0.36. Carparking is provided to the north and south of the site, in two separate surface level areas accessed from Cardiffsbridge Road and Wellmount Road respectively.

### 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. In summary, the report concludes:
  - There will be minimal reduction to the available daylight and sunlight levels to the adjacent dwellings. There will be no reduction in sunlight to private or communal amenity spaces. The results find that any impact on the adjacent residential structures would be imperceptible. All areas assessed continue to meet or exceed the recommendations of the BRE guidelines (2022)
  - 100% of the Living, Dining, Kitchen and Bedroom spaces within the proposed development achieve the target values set out in BS EN 17037:2018+A1:2021 section NA1. These are the minimum values, per specified use, to be achieved in habitable rooms and meets the recommendations of the BRE guidelines.
  - This scheme is well designed for sunlight, with 94.8% of units meeting the minimum recommended 1.5 direct sunlight hours. This is in line with the BRE guideline example for an apartment layout where 4 in 5 achieves the target sunlight hours. The communal and public amenity spaces both achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21<sup>st</sup> March and meets the recommendations of the BRE guidelines.
  - EN 17037:2018 sets out values for target illuminance, minimum target illuminance and fractions of reference plane to be achieved. The target and minimum target levels set out in EN17037:2018 are for any type of building; they do not take into account room use or make allowance for rooms that have a lesser requirement for daylight. The results of this assessment indicate a high level of daylight provision, with 100% of rooms achieving Minimum Illuminance and 100% achieving Target Illuminance.
  - In conclusion, no compensatory measures are required indicating that the proposed development meets the required daylight/ sunlight standards and in considering the impact of the proposed development on surrounding properties.
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.

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 6 storey within the permissible envelopes of the Dublin City Development Plan, specifically SDRA 3 which encourages building heights in the range of 3-6 storeys.

Due to the change in levels across the site from north to south the heights have been adjusted accordingly with 4 storeys proposed to the north of the site stepping up to 6 storeys to the south. The overall maximum height when taken from ground floor level is 21.8m. This reduces to 15.5m at the north western corner of the site. Both heights are inclusive of roof plant and parapet features.

Section 6.4 of this report has assessed the proposal against the assessment criteria listed in Appendix 3 to the Dublin City Development Plan, which is intended for justification of development of an increased height, density or scale.

The key relevant Specific Planning Policy Requirements (SPPRs) are summarised as follows:

**Table 9: Building Height Guidelines SPPRs**

SPPR	Summary	Application of Consistency
SPPR 1	Planning Authorities are responsible for identifying appropriate locations for building heights in their statutory plans and that no blanket 'numerical' height shall be applied.	This is the responsibility of Dublin City Council. The proposed development provides for a range of height from 4 to 6 storey within the permissible envelopes of the Dublin City Development Plan, specifically SDRA 3 which encourages building heights in the range of 3-6 storeys
SPPR 2	In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy.	This is the responsibility of the Planning Authority. The site is zoned Sustainable Residential Neighbourhoods and Open Space under the Development Plan and capable of catering for the proposed public open space and community, arts and cultural spaces.  Thus, the proposed development provides for the appropriate urban development of the area, to deliver compact growth on an existing greenfield site.
SPPR 3	Development Management Criteria are set out. Where an applicant sets out how a development proposal complies with the criteria and the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and these guidelines the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.	The proposed development ranges in heights between 4-6 storeys in height. Having regard to the prevailing urban context of the site, the proposed height is considered to be an appropriate scale to achieve the required density on the site and deliver compact growth on this greenfield infill site.  Table 12 below outlines how the proposed development complies with the development management criteria listed in section 3 of the guidance.

SPPR	Summary	Application of Consistency
SPPR 4	<p>In planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:</p> <p>minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; a greater mix of building heights and typologies in planning for the future development of suburban locations; and avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.</p>	<p>The proposed scheme gives rise to a net density of 138 uph which accords with the density ranges of the Development Plan and the Sustainable Residential Development and Compact Growth Guidelines for Planning Authorities. The proposal includes varying heights of 4 to 6 storeys which contrast with the existing built form surrounding the site.</p>

Development management criteria are set out under section 3 of the Guidelines. These are addressed in the table hereafter.

**Table 10: Development Management Criteria**

Scale	Criteria	Response
City/ Town	The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is located adjacent to the Bus Connects F-Spine serving Finglas-City Centre-Kimmage which was granted planning permission for this route on 12th March 2024. The site will also be located c. 700m from the preferred new Luas stop at St Helena's. The site is currently well served by a number of bus routes including Dublin Bus no. 40 and 40E routes and Goahead Bus Service Bus no. 220.
	Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection	The proposed development is not located in an architecturally sensitive area. It proposes a height of up to 6 storeys. The site is a greenfield infill site surrounded by low density housing within an established urban neighbourhood of Finglas. The redevelopment of the site for residential use and public open space will enable the efficient use of residentially zoned land capable of delivering compact growth. The proposed development is of

Scale	Criteria	Response
	<p>of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</p>	<p>modest scale, well within permissible heights envisaged by the Dublin City Development Plan, specifically SDRA 3 and would not warrant a landscape and visual assessment. However, a series of 3D massing images of the proposed development Please refer to SHB4-WRF-RP-DD-AR-P3-6300-Photomontages &amp; CGI Views.</p>
	<p>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>The gross site is 1.34 ha and of relatively small scale. The proposed development consists of public open spaces and a variety of height and massing forms have been utilised to achieve a scale of development that meets the required density on the site. The surrounding scale of development adjoining the site varies with 2 storey residential units located to the east, west and south of the site. Immediately north of the site is a shopping centre which includes a Dunnes supermarket and a parade of shops. The shopping centre complex is one-storey high. The proposed development responds to the prevailing context while also achieving the required density of an infill site located in a SDRA and in proximity to existing, permitted and proposed high-quality public transport.</p>
<p>District/ neighbourhood/ street</p>	<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</p>	<p>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 presents a new urban edge to Cardiffsbridge Road, whilst forming a backdrop to the developed public open space.</p> <p>The proposed development has endeavoured to retain the existing residential amenity of the area while also enabling the delivery of an infill development. is strongly considered that the proposed development responds to the natural and built environment with a high-quality scheme that will positively contribute to the urban neighbourhood.</p>
	<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>The proposed development will front Cardiffsbridge Road with access routes to the north and south of the site. The proposed apartment block will create a new urban edge and provide passive surveillance to the proposed public open space and Cardiffsbridge Road. The proposed block is not monolithic and includes rhythm and symmetry in the façade treatment.</p>



Scale	Criteria	Response
		<p>The use of various tones (the primary finish is proposed is a soft red-buff multi brick with off-white mortar colour and with a white brick proposed to secondary areas) of clay brick is considered to be an appropriate choice having regard to the site context and the elevations indicate that the use of the various tones will break up the overall bulk of the façade. Articulation is proposed to be expressed through the use of different bricks used on projecting and recessed building planes to break up the building massing and differing brick bonding patterns around windows and at plinth level. Please refer to the Architect’s Design Statement.</p>
	<p>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).</p>	<p>The high-quality proposal will provide an improved streetscape and provides a significant public open space provision at the site. The proposal will also create a human scale between the landscaped and built areas of the site, allowing for passive surveillance.</p> <p>A Desktop Flood Risk Assessment has been undertaken for the proposed development.</p>
	<p>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</p>	<p>The layout provides for the key building frontage envisaged under the SDRA. This is especially important for this particular section of the Cardiffsbridge Road which avails of little to no natural surveillance or overlooking. The north western corner of the site at ground floor has been designated for community/arts/cultural use which will provide street activation and passive surveillance in the vicinity of the junction. It will also provide a focal point and wayfinding/identifying feature on approach from north to south.</p> <p>The high-quality proposal will provide an improved streetscape and improve the public open space and community space offering in the area. The proposal will also create a human scale and improve the legibility between the site and the surrounding area.</p>
	<p>The proposal positively contributes to the mix of uses and/ or building/</p>	<p>The proposed development includes 77 units, of which 38 are 1-bed (49.4%), 25 are 2-bed (32.4%) and</p>

Scale	Criteria	Response
	dwelling typologies available in the neighbourhood.	14 are 3-bed (18.2%). The housing stock owned by DCC in the area is currently not reflective of the population composition. The Council principally owns 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 made of 64% of owner-occupiers (with and without mortgage). Only 17% of the stock is rented from the local authority and a further 1% from a voluntary body. The proposed development will help alleviate demand in the area.
Site/building	The form, massing and height of proposed development should be carefully modulated so as to maximise access to natural daylight ventilation and views and minimise overshadowing and loss of light.	<p>A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.</p> <p>The Design Statement sets out in detail the design rationale of the scheme. The majority of apartment are dual aspect. No direct north facing single aspect apartments are proposed, it is noted that some of the apartments face north east but overlook the proposed public and communal areas of open space in accordance with Section 15.9.3 of the Development Plan. All apartments have been designed to include generous storage provision.</p>
	Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’	A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.
	Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local	We refer to the enclosed Sunlight & Daylight report. The proposal meets all the requirements. No compensatory measures are required.

Scale	Criteria	Response
	<p>factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</p>	
<p>Specific Assessment</p>	<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</p> <p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision</p> <p>An assessment that the proposal allows for the retention of important</p>	<p>Micro-climate effects relate to tall buildings where wind can be accelerated either through narrow channels between these structures or, from being accelerated downward towards the ground through downdraft effect.</p> <p>A Wind Micro-Climate Modelling Study has been undertaken by B-Fluid and accompanies this application. The study concludes:</p> <p><i>"As a result of the proposed development construction, the wind on the surrounding urban context remains suitable for the intended use when compared with the baseline situation. The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for "Frail persons or cyclists" and for members of the "General Public" in the surrounding of the development. Therefore, the CFD study carried out has shown that under the assumed wind conditions typically occurring within Dublin for the past 15 years: the development is designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian), and the development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads."</i></p> <p>An AA Screening has been prepared by NM Ecology and is enclosed with this submission. The AA Screening concludes that there is no risk to Natura 2000 interest identified. An Ecological Impact Assessment and Winter Bird Survey have also been prepared and accompany this application.</p> <p>The development is not of such scale that this assessment is required.</p>

Scale	Criteria	Response
	telecommunication channels, such as microwave links.	
	An assessment that the proposal maintains safe air navigation	The development is not of such scale that this assessment is required.
	An urban design statement including, as appropriate, impact on the historic built environment	A Design Statement has been prepared by Sean Harrington Architects and is enclosed with this application. There is no impact on the historic built environment.
	Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate	An AA Screening has been prepared by NM Ecology and accompanies this application. An EIA Screening has been prepared and is enclosed with this application. These are summarised in this report. SEA does not apply.

### 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 support the consolidation of the urban fabric. It also includes some community infrastructure with the provision of a community room at ground floor of the apartment block. The proposed development is adjacent to a bus stop and has access to a wide range of facilities. As demonstrated in section 4 of this report, it will also contribute to a greater diversity in housing tenure and type.

## 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 and Regeneration Development Area (SDRA) 3 with a planned residential yield of 2,800 units to equate 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 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 Z9 'Amenity / Open Space Lands / Green Network (Open Space)'.

Z1 has a zoning objective of *'to protect provide for and improve residential amenities'* where residential development is a *'permissible use'*.

Z9 has a zoning objective of *'to preserve, provide and improve recreational amenity and open space and green networks''*

As can be seen from the zoning map above, the Z9 zoning is confined to the Wellmount Drive frontage. The proposed development of apartments and supporting infrastructure is consistent with the zoning objective Z1 (Sustainable Residential Neighbourhoods) and is therefore considered acceptable in principle under that zoning objective. The proposed residential development is confined to the Z1 zoning at the lands. These landscaping proposals combined with the orientation of the proposed structures would enhance the area designated Z9.

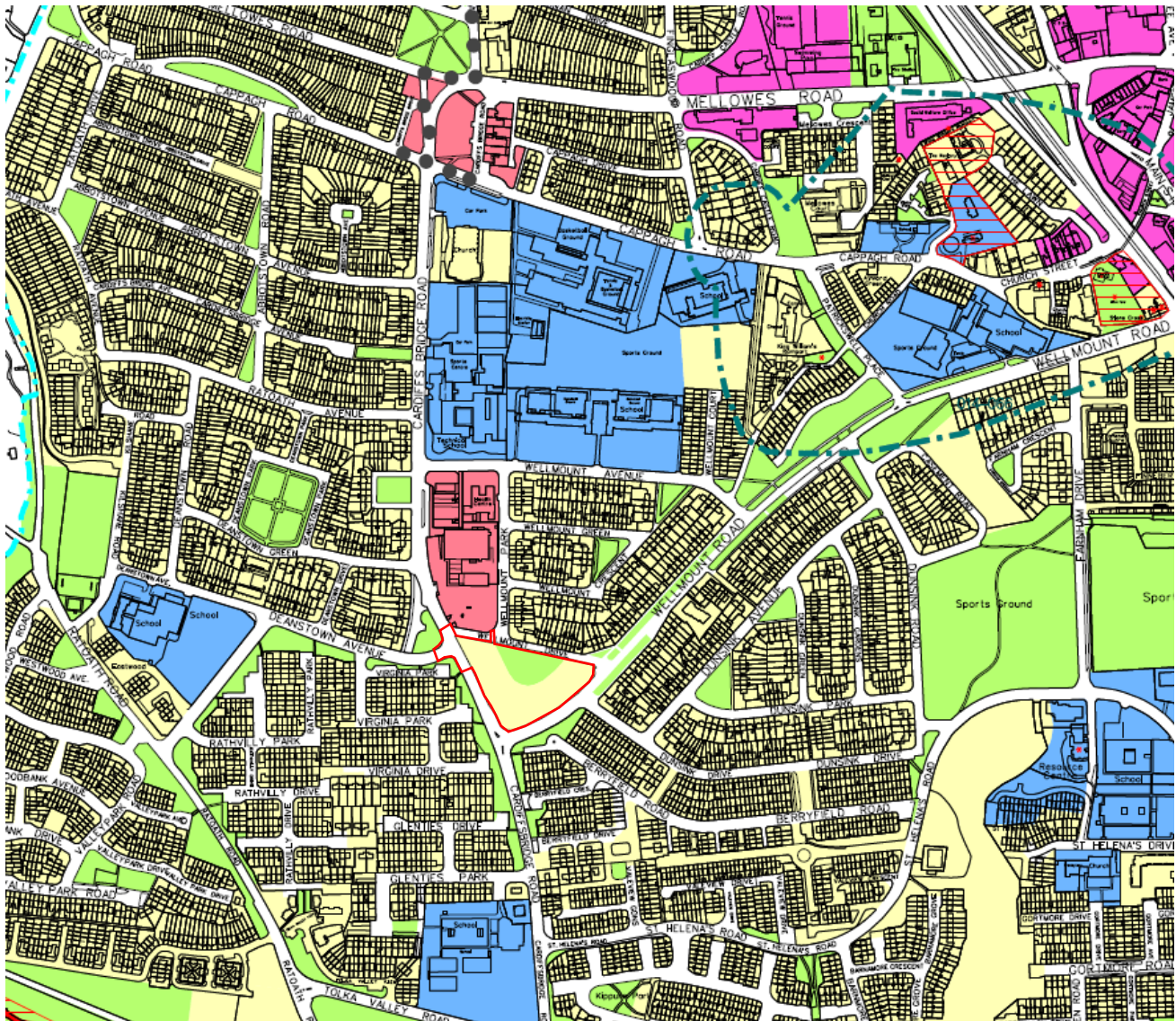


Figure 12: Extract from the land use zoning map of the DCC CDP 2022-2028 (source: DCC)

The applicable zoning at the site is noted, particularly the placement of the Z1 lands. As part of the subject application, it is intended to deliver the eastern portion of lands zoned Z1 as public open space. The subject application is one element of the redevelopment of the site, with potential further development along Wellmount Road. However, such development would be subject to a separate planning consent process if it were to proceed in the future.

**Strategic Development and Regeneration Area**

The site is located within the boundary of 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	

Objective SDRAO1	Development Response
<p>management standards set out in Chapter 15; and in line with the following overarching principles:</p>	
<p><b>Architectural Design and Urban Design:</b> 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 long term, viable and sustainable communities aligned with the principles of the 15- minute city.</p>	<p>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.</p>
<p><b>Phasing:</b> 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><b>Access and Permeability:</b> 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 scheme on a greenfield site. The proposal provides a north-south pedestrian link through the site, and access to the new public open space from the south, the permeability provides to service the site, providing access to carparking and communal open space behind the building line.</p> <p>The site will also be located c. 700m from the preferred new Luas stop at St Helena’s. the site is currently well served by a number of bus routes including Dublin Bus no. 40 and 40E routes and Goahead Bus Service Bus no. 220. The Part 8 scheme has been designed in accordance with the principles of DMURS.</p>
<p><b>Height:</b> 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 well removed from the lower density housing units located to its west and is not of such height that it would injure residential amenity. The proposed height is in accordance with the SDRA 3.</p>
<p><b>Urban Greening and Biodiversity:</b> 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</p>	<p>The public open space provision is well in excess of the 10% requirement envisaged by the CDP, as it includes the Z9 lands fronting Wellmount Drive as well as the eastern portion of lands zoned as residential. Overall, the public open space provision amounts to 0.564 ha or 50.4% of the gross site.</p>

Objective SDRAO1	Development Response
<p>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 landscape design aims to strengthen the value of the site as a place for delivering green/blue infrastructure whilst protecting and enhancing the natural assets of the site.</p> <p>A Biodiversity Enhancement Plan has been prepared and is included in the Landscape Design Report prepared by Mitchell Associates with input from NM Ecology for the proposed development and details how it will support local biodiversity into the future.</p>
<p><b>Surface Water Management:</b> 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 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 nature-based drainage measures such as tree pits, green roofs, blue roofs, rain gardens, filter drains, detention basins and permeable paving.</p>
<p><b>Flood Risk:</b> 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><b>River Restoration:</b> 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><b>Sustainable Energy:</b> 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</p>	<p>Please refer to the accompanying Climate Action Energy Statement &amp; Part L Report.</p>



Objective SDRAO1	Development Response
<p>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) where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated.</p>	
<p><b>Climate Change:</b> 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 &amp; Part L Report.</p>
<p><b>Cultural Infrastructure:</b> 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 includes 135 sqm of community, arts and cultural space. As the development is located in a SDRA, then the requirement would apply. This means that 269 sqm of community floorspace would be required. Please see below this table for further elaboration.</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 135 sqm of community, cultural and arts space which is in below the 5% space required at the subject site. The net internal area of the proposed development is 5372 sqm, which results in an area of 269 sqm (5%) provision required at the site to comply with CUO25. The remaining 2.5% has been reallocated to a nearby concurrent Part 8 development at the former Church of the Annunciation site at Cardiffsbridge Road in order to deliver a larger space that is capable of adapting to a multitude of uses and activities. 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. The relocation of a portion of the community, arts and cultural space will deliver a greater quantum of space at the former Church of the Annunciation site and is considered to derive better outcome for the usage of the space, in particular, for arts and cultural facilities in the area which was identified as a deficit in the SIA and Finglas Strategy 2021.

This development should not be viewed in isolation from the other NDFA Social Housing Bundle (SHB) 4 sites. The former Church of the Annunciation site forms part of the NDFA SHB 4 programme and is subject to a separate concurrent Part 8 application. The former Church of Annunciation site includes 434 sqm of community, cultural and arts floorspace in a rectangular space that can be easily divided as necessary. Community space at the location will be in excess of the 5% required. It is also important to note that the Finglas Strategy which informs the SDRA 3 in the CDP has not identified any of the two sites as being key in meeting arising community and cultural floorspace requirements. It particularly identified the Jamestown Industrial Land and the Finglas West Neighbourhood Centre as potential location. The Church of Annunciation's community space is located adjacent to the proposed public open space which could allow for the organisation of indoor / outdoor events such as community festivals or theatre productions.

The proposed community, arts and cultural space at the subject site will be managed by PPP co. and 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 specific guiding principles are set out for both the development and regeneration of Finglas Environs. 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 setbacks, 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.
- 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 Guiding Principles Map identifies a number of key development opportunity sites which would play a key role in the creation of a viable commercial centre for Finglas and in fostering the economic revitalisation of the village. Central to this overall strategy is the recognition that mixed use development in the village will be sought, including new residential development in order to maintain and grow the critical mass necessary to support the continued economic viability of the village, while supporting proposed investment in public transportation.
- Encouraging increased pedestrian activity in public spaces, streets and parks is considered a priority and a key element to a placemaking strategy. In order to achieve this, a diversification of land use is required.
- Proposed building heights shall respond to the prevailing scale and grain of the building stock, relate to the width of streets and respond to unique site characteristics such as topography and aspect. Height shall also relate to function and as such, should be considered as part of the wider environs. Amplified height may be appropriate in certain locations as identified in the Guiding Principles Map.
- In general, building heights in the range of 3-6 storeys, will be encouraged in order to provide a coherent street structure with an appropriate sense of enclosure, while responding to the existing character of the village.

The SDRA guiding principles is illustrated in map format below.

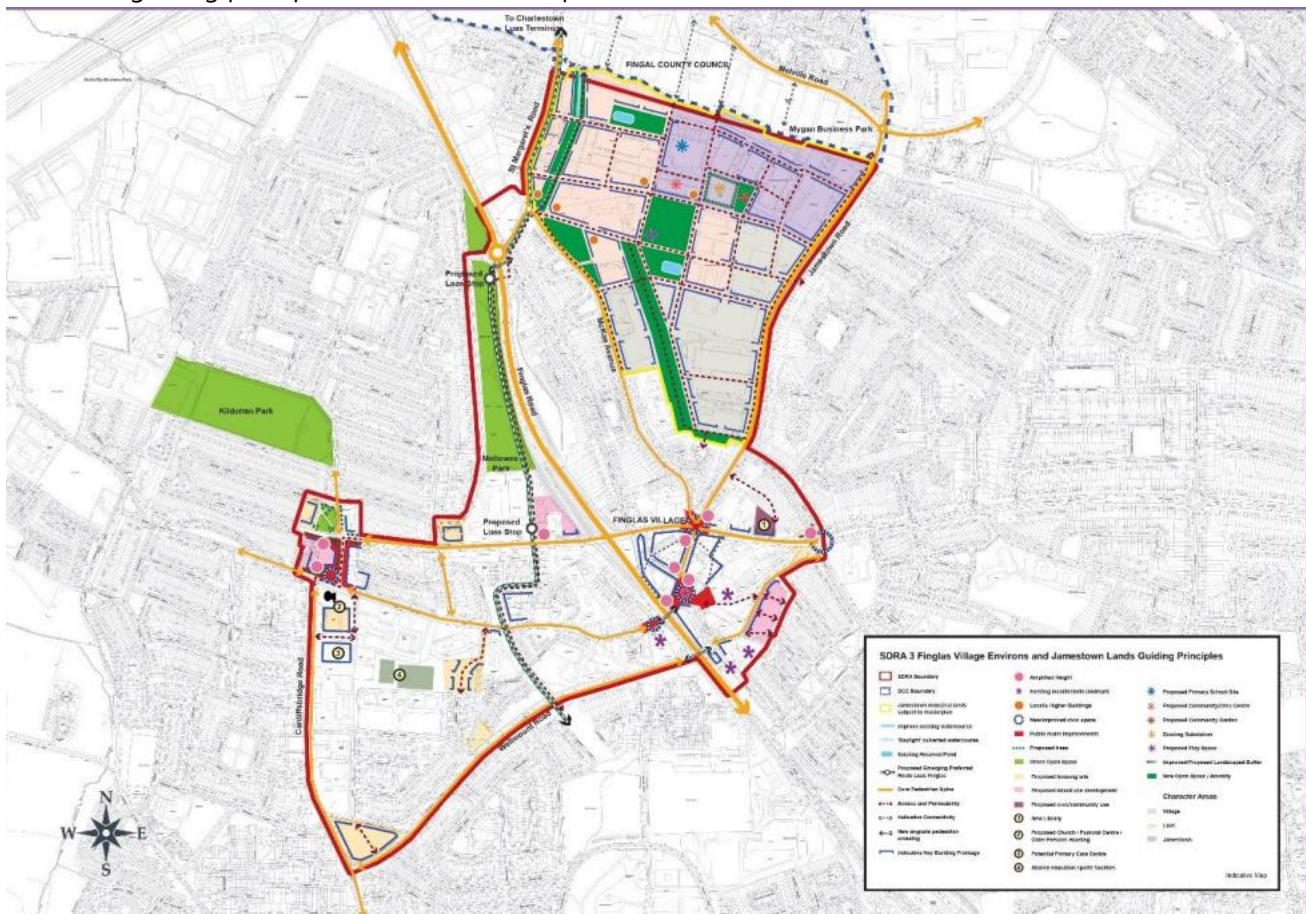


Figure 13: Guiding Principles for SDRA 3 (Source: DCC)

The SDRA 3 Finglas Village and Environs Guiding Principles Map at Figure 13.6 shows indicative building frontages on all sides of the triangular shaped land. It is noted however that this would conflict with the Z9 zoning on the northern fringe where building frontages, therefore, it is considered that this use of the land should be reserved for open space/recreation.

The proposed development aligns with the guiding principles of the SDRA, insofar as,

- The layout provide for the key building frontage envisaged under the SDRA. This is especially important for this particular section of the Cardiffsbridge Road which avails of little to no natural surveillance or overlooking.
- The north western corner of the site at ground floor has been designated for community/arts/cultural use which will provide street activation and passive surveillance in the vicinity of the junction. It will also provide a focal point and wayfinding/identifying feature on approach from north to south.
- The proposed development will cater for a key building façade on the Cardiffsbridge Road which is noted as having poor roadside open space layout. The framework also envisages that a new/enhanced pedestrian cycling amenity connection. The proposed layout follows that principle and maintain a development-free axis which will cross the public open space.
- The proposed layout translates the key building frontages and connectivity link.
- The bulk, scale and massing are respectful of surrounding existing and proposed uses and do not inhibit the development potential of the rest of the landbank. Providing an element of height at the location will allow for rebalancing of the dominance of the road network at the location.
- Improvements to the streetscape and public realm will be actively encouraged and explored and this will be achieved through the redevelopment and formalisation of the public open space.
- Enhanced tree planting is proposed as the proposed development will require the removal of 7 trees of low quality and value (C Category) and 2 trees of poor quality (U Category).

In addition, the SDRA includes consideration for heights. It notes that proposed heights should respond to prevailing scale and grain of the building stock, relate to the width of streets and respond to unique site characteristic such as topography and aspect. Unless specified by the guiding principle map shown above, height should be in the range of 3 to 6 storeys, with monolithic heights avoided. The proposal includes stepped height from 4 to 6 storeys to espouse the changing level of the site and avoid impinging on the development potential of the landbank. Given that the surrounding road network dominates the site and that there is little to no interaction between the surrounding estates and the road network as these either side or are turned against it, 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 or Wellmount Drive, which would be the closest.

### **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. Currently, 84.6% is made up of houses and the housing stock owned by DCC in the area is currently not reflective of the population composition. The Council principally owns 3-bed units (55.7%) and 2-bed units (23.3%). Comparatively, only 11.7% of the stock consists of single-bed units. The provision of apartments, including a significant proportion of one bed roomed apartments would therefore provide for a more varied housing stock. In addition, this part 8 development will help to diversify the housing stock in Finglas which is dominated by 3-bed single family terrace housing.

The part 8 application also supports the achievement of QHSN9 on active land management. The lands were identified as a priority 'ready-to-go' site under the Finglas Strategy. The site is located in a SDRA. With a

proposed density of 138 uph, based off a site of 0.56 ha which exclude the external road network, Z9 lands and the eastern portion of lands which will be delivered as public open space, the proposal aligns with QHSN10 ('Urban Density') as the part 8 site is an infill greenfield site and has been underutilised for some time. The proposed development 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 a range of household from the 1 person household to the 5 persons household. 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 neighbourhood centre and close to the community and social infrastructure hub located some 300 m at Fergal's Field, where the Church of Annunciation is located. 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 will positively support the achievement of QHSN17 on Sustainable Neighbourhoods insofar as it will provide a range of unit sizes (1 to 3-bed), will include 29% (22 no. units) of universal design units and 61% (47 no. units) are avail of additional 10% floor space as envisaged under the Apartment Guidelines. The proposed development is also in accordance with QHSNO11 'Universal Design'.

The proposed development includes a community space (135 sqm) at the corner of Cardiffsbridge Road and Wellmount Drive. The space has been designed to be used for different purposes at different times. The provision of such space is aligned with policies QHSN47 High Quality Neighbourhood and Community Facilities, QHSN50 Inclusive Social and Community Infrastructure and QHSN60 development, improvement and provision of community facilities. 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. Having regard to the locational characteristics of the site in proximity to public transport, employment, services and facilities, the subject scheme includes a reduced level of car parking provision, which encourages sustainable modes of transport. The proposed development includes for 28 no. car parking space or a ratio of 0.36 per unit. It makes generous allocations for cycle parking it is located near a range of buses. There are also plans for the development, within 800m of the site, of the Finglas Village Luas Stop along the preferred Luas Finglas route, which is 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 138 uph, which aligns with the policy to intensify development along transport corridors.

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, with accords with SMT6.

Importantly, the site makes allocations for connectivity as can be seen in the 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. A Quality Audit has been undertaken and accompanies the proposed development. In accordance with DMURS, this Quality Audit includes a Walking and Cycling Audit. The Quality Audit also incorporates a Stage 1 Road Safety Audit to ensure that all road safety implications are fully addressed at planning design stage. This ensures that a safe street environment is being implemented and delivered by the proposed development design. The infrastructure enhancements along the entire site frontage of the subject site represent a significant improvement to the public street corridor with landscaping proposals complementing the improved pedestrian route accords with SMT11.

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. Car parking is provided to the north and south of the site, in two separate surface level areas accessed from Cardiffbridge Road and Wellmount Road respectively. The proposed development includes a 28 no. spaces within the site. The site is located within parking zone 2 due to its location along key transport routes and the maximum car parking standards are 1 per dwelling. By providing a reduced level of car parking provision, the subject scheme seeks to encourage future residents to either walk or cycle to Finglas Village and the city centre and all of the amenities contained therein or avail of the high-quality public transport in close proximity to the subject site. Therefore, the reduced provision of car parking for the subject scheme will contribute to consolidated growth and the reduction in carbon emissions.

In terms of bicycle parking, 134 long stay spaces are provided and 41 short stay spaces are provided. This equates to an overall quantum of 175 no. spaces. Bicycle stores are in the form of secure indoor rooms within the ground floor of the building. Visitor bicycle parking in the public realm is well overlooked from apartments units. Pedestrian and cycle access is provided by direct footpath access to the communal open space, independent of the car parking areas.

### **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 with 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 public open space.

GIO1 ('Green Roof Guidance Document') should also be noted. The development response is provided under the development management section of this report. Refer to the Malone O'Regan SuDS detail drawing no. SHB4-WRF-DR-MOR-CS-P3-151 for typical roof details.

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 the provision of high quality landscaped communal space. The application site includes 0.263 ha of Z9 open space which equates to a net space of 23.5%. In addition to the zoned lands for open space, the proposal will deliver an additional quantum of public open space on the eastern portion of the site which in combination with the zoned open space lands will deliver 0.564 ha of public open space (50.4%) which is well in excess of the requirements stipulated under the Development Plan.

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 where possible and includes tree planting into landscape proposals.

The proposed development includes children’s play facilities as required under GI51 and GI52.

**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 11: 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	See Daylight and Sunlight Assessment
Community and Social Audit	50 or more residential units Any development comprising of community or social infrastructure	See Social Infrastructure Audit
Lifecycle Report	All apartment developments	See Building Lifecycle Report
Community Safety Strategy	100 residential units	See Architectural 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
Road Safety Audit	Any development with construction of new roads, materially affects vulnerable users and amends existing roads or	See Quality Audit

Reports	Threshold	Application Reference
	generating significant road movement	
Mobility Management Plan / Travel Plan	20 or more residential units Any development with zero/reduced car parking.	See Traffic Mobility Management Plan
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 curtilage of a protected structure, and / or effecting or within the curtilage of a protected monument.	n/a
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 Ecological Impact Assessment Report



Reports	Threshold	Application Reference
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	A microclimate assessment has been undertaken.

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.
- An Archaeological Impact Assessment prepared by John Purcell Archaeological Consulting accompanies this Part 8 application.
- 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 greenfield site, the proposed insertion of the development within the existing landscape context is considered appropriate. The proposal has sought to deliver a high quality residential development on the western portion of the site while also enhancing the public open space provision at the site to serve a range of uses and activities for members of the public and residents of the respective scheme. The proposed development will directly front Cardiffsbridge Road which avails of little natural surveillance, in spite of having one bus stop in the vicinity. The surrounding estates, with the notable exception of Wellmount Drive have no relationship with the road network and are mainly inward facing. This makes the site exposed and lack in a sense of safety. On account of the existing setting of the site, the proposed scheme will positively impact the landscape character and visual amenity on account of the existing

**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 includes natural landscaping with limited hard surface insofar as possible. Detention basins are to be located at the lowest point of the site to allow for natural drainage. There is no cut and fill on the site with the building form adapting to the changing levels.</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.</p> <p>(see also GI7 'Connecting Greening Elements in Site Design')</p>	<p>The development site includes a Z9 area which will be landscaped. It is proposed to keep the area as natural as possible to provide a link in the green infrastructure network. The main green corridor in the area is the Tolka Valley Park which is located less than 500m south. The roof of the apartment block will be fitted with green roof.</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>Throughout the design process, the City Council's Parks, Biodiversity and Landscape Services division has been consulted regarding the proposed development. Extensive Winter Bird Surveys have been undertaken by NM Ecology which has informed the design process of the proposed development. Further information on the ecological nature of the site is discussed under section 7.3 of this report or in the accompanying Ecological Impact Assessment Report.</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>Surface Water Management Plan for the Development is incorporated into the Engineering Report prepared by Malone O'Regan.</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. In addition, drawing no. 150 prepared by Malone O'Regan. The site is identified for the implementation of area-based SuDS enhancement features. The</p>

Standard	Development Response
	proposed development includes a detention basin as can be seen in drawing no. 150.

**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-WRF-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.	The proposed development includes the provision of tree planting and green and blue roofs. Refer to the Malone O'Regan SuDS detail drawing no. SHB4-WRF-DR-MOR-CS-P3-151 for typical roof details. Please refer to Mitchell + Associates Landscape Plan for the landscaping strategy at the site. The proposed development also includes a significant public open space provision at the site which will positively contribute to the urban greening strategy at the site.

**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. SHB4-WRF-DR-MAL-L-P3-0101 Landscape Masterplan
A tree survey must be submitted where there are trees within a proposed planning application site.	Please refer to drawing Tree Survey & Constraints Plan prepared by Charles McCorkell Arboricultural Consultancy.

**Public Open Space and Recreation**

Standard	Development Response
<p>The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.</p>	<p>The public open space includes informal play and biodiversity measures to provide different ecosystems for fauna. Three main paths are covering the whole space while also providing soft landscape features. Benches are implemented regularly along the path. Connectivity links to the north, east and south will be provided. To the west, a boundary wall will be integrated to deliver a defined separation between the public open space and communal open space.</p> <p>Large areas of grass will be also provided to accommodate differing uses, such as seating areas, large play areas or resting areas. A natural play area is proposed along the northern path and will be accessible by the adjacent community by a connection to the north. The natural play area will encompass a defined play area on mulch with wooden based furniture and a mounded play area on grass, enhanced with natural play elements such as wooden logs and stepping stones.</p> <p>Series of fitness equipment are dispatched along the northern path to propose another use to the public open space. This equipment will be located along the buffer strip separating the site from the adjacent buildings and road.</p>
<p>Open space should be overlooked and designed to ensure passive surveillance is achieved</p>	<p>The area is currently poorly overlooked. The proposed development sought to achieve natural surveillance both over the road network and the open space. The block will effectively be lower than the area of open space but owing to its height it can provide natural surveillance onto the Z9 lands to the north. To the rear of the block, east facing, balconies are provided to the units which overlook the proposed communal open space and wider public open space to the east as well as the car parking areas which further enhances the security of the site.</p> <p>Please refer to landscape drawing no. SHB4-WRF-DR-MAL-L-P3-0101 Landscape Masterplan</p>
<p>The space should be visible from and accessible to the maximum number of users.</p>	<p>Please refer to landscape drawing no. SHB4-WRF-DR-MAL-L-P3-0101 Landscape Masterplan</p>

Standard	Development Response
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.	Aside from the communal open space, there is no new area of public open space. Public open space is to be located on the existing green space which includes zoned Z9 lands.
Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	It should be noted that all trees on site have been surveyed and were deemed to be of low quality. The site is amenity grassland. The site is generally very exposed and therefore the proposed development provides the opportunity to provide some identity to the area. Please refer to the arborist drawings and reports accompanying this application for further information.
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, communal 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.	The proposed materials/finishes are clearly annotated on all elevational drawings. The indicated materials are considered to be attractive, well balanced and easily maintained. The use of various tones (the primary finish is proposed is a soft red-buff multi brick with off-white mortar colour and with a white brick proposed to secondary areas) of clay brick is considered to be an appropriate choice having regard to the site context and the elevations indicate that the use of the various tones will break up the overall bulk of the façade. Articulation is proposed to be expressed through the use of different bricks used on projecting and recessed building planes to break up the building massing and differing brick bonding patterns around windows and at plinth level. Please refer to the Architect’s Design Statement.

Standard	Development Response
Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.	Seating opportunities will be provided in the different areas of the communal open space. Benches and board game tables are proposed as well for all age groups. Different flexible amenity lawn areas are proposed throughout the communal open space, and will be used as seating areas or relaxing areas for all age groups. Three main paths are covering the whole area while leaving the space to soft landscape features. Benches will regularly be implemented along the path.
Age friendly measures should be incorporated into the design.	All parts of the development will be accessible. There will be seating in the communal and public open space.
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.	Two vehicular accesses are proposed, with one from Cardiffsbridge Road and one from Wellmount Road. Please refer to landscape drawing no. drawing no. SHB4-WRF-DR-SHA-AR-P3-0005-Proposed Site Boundary Treatment prepared by Sean Harrington Architects.

**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 application site includes 0.263 ha of lands zoned Z9. This contributes to meeting the 10% requirement on the site. It is important to note that the SDRA 3 Finglas Village and Environs show that the site would be avail of indicative building frontage on its three sides which would conflict with the Z9 zoning on the northern fringe. The location of the public open space is therefore proposed at the location of the Z9 zoning, and extends into the eastern portion of lands zoned as Z1 residential. The proposed provision is well excess of the 10% requirement with 50.4% of the site area being provided.

**Play Infrastructure**

Standard	Development Response
<p>In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.</p>	<p>The amenity spaces provided are family oriented and will provide a safe and accessible play area and natural play area for a younger age groups. Those play areas will be accessible and enclosed with planting to give off a sense of security. The formal play area will also be fenced for safety. Mounded play features in the natural play area will be enhanced with play equipment (slides, stepping stones, logs, climbing wall, etc.). Having regard to the proposed number of units, a play area for older children and younger teenagers is not required.</p>

**Apartment Standards**

Standard	Development Response
<p><b>Unit Mix</b>                      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 &amp; Community Services Department.</p>	<p>This part 8 proposal was formulated jointly with the DCC Housing Department. The proposed mix includes 49% one-bed units, 32% 2-beds and 18% 3-beds. Just under half of the units proposed at the Wellmount Road site are 1-bed units. The housing stock owned by DCC in the area is currently not reflective of the population composition. The Council principally owns 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. The development therefore complies.</p>
<p><b>Unit Size / Layout</b>                      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><b>Dual Aspect</b>                      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>51% of the units are dual aspect. The development complies.</p>
<p><b>Floor to Ceiling Height</b>                      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>

Standard	Development Response
<p><b>Lift, Stair Cores and Entrance Lobbies</b> a maximum of 12 apartment per core may be provided</p>	<p>There are four cores proposed. The development complies.</p>
<p><b>Internal Storage</b> 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><b>Private Amenity Space</b> Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</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>All units have been provided either with private balconies or ground floor terraces. All private amenity spaces meet or exceed the minimum floor area requirements set out in Appendix 1 of the apartment guidelines.</p> <p>Given that there are a number of own-door entrance at ground level with access directly onto the street, it was important to ensure that these units be given privacy, but also that this would not create a defensive frontage onto the street. As a result, the boundary treatment consists of a non-continuous boundary, which will be in mix materials to avoid a linear treatment. Please refer to drawing SHB4-WRF-DR-SHA-AR-P3-0004 Proposed Site Plan and drawing no. SHB4-WRF-DR-SHA-AR-P3-0005-Proposed Site Boundary Treatments prepared by SHA.</p>
<p><b>Communal Amenity Space</b> 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>Communal open space is provided for the apartments to the east of the building with a total of 1100sqm proposed. Appendix 1 of the Design Standards for New Apartments - Guidelines for Planning Authorities (2023) sets out minimum quantitative standards for communal open space and based on the number of units proposed a total of 491sqm is required therefore the proposed development exceeds this requirement and provides for a generous amount of communal open space.</p>
<p><b>Internal Communal Facilities</b> 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 135 sqm community, cultural and arts space is provided as part of the development that will be open to residents to utilise.</p>
<p><b>Security</b> 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 Architecture Design Statement for details of the Community Safety Strategy. There are 4 core lobby areas located along the north eastern side of the building which overlook the parking and communal open space. In addition,</p>



Standard	Development Response
	<p>balconies to the ground floor units provide surveillance of these access lobbies for passive surveillance. These lobbies are also accessible from the front of the building which will further enhance passive surveillance and activation of these areas.</p>
<p><b>Access and Services</b>                      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 proposed block and have been designed to suit all users, regardless of their abilities.</p>
<p><b>Refuse Storage</b>                      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 the site layout drawing prepared by SHA, which illustrates two external spaces for refuse storage.</p> <p>An Operational Waste Management Plan accompanies this part 8 application.</p>
<p><b>Lifecycle Reports</b>                      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><b>Operational Management and Maintenance</b>                      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><b>Microclimate – daylight and sunlight, wind and noise</b>                      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.</p> <p>Section 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 not within a designated noise</p>

Standard	Development Response
	<p>zone as indicated on the development plan zoning maps. A noise impact assessment is therefore not required in this location.</p> <p>As the application site is exposed to wind and surrounded by 1-2 storey housing units. A microclimate study accompanies this Part 8 application. In summary, the Wind Microclimate Study concludes:</p> <p><i>“As a result of the proposed development construction, the wind on the surrounding urban context remains suitable for the intended use when compared with the baseline situation. The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for “Frail persons or cyclists” and for members of the “General Public” in the surrounding of the development. Therefore, the CFD study carried out has shown that under the assumed wind conditions typically occurring within Dublin for the past 15 years: the development is designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian), and the development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads.”</i></p> <p>A daylight and sunlight assessment accompanies this part 8 application.</p>
<p><b>Daylight and Sunlight</b> 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><b>Separation Distance</b> 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 closest dwellings are those located at Virginia Park. The separation distance is 36.8m.</p>

Standard	Development Response
	<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><b>Density Ranges</b> SDRA: 100-250 uph</p>	<p>The proposed development has a net density of 138 uph and therefore accords with the ranges of the CDP for a site within a SDRA.</p> <p>To calculate the density on the site, a net developable site area of 0.56 ha has been adopted. The net site area does not include the zoned open space lands or the additional lands being delivered as public open space at the development. This leaves a developable site of 0.56 ha which therefore yields a density of 138 uph.</p> <p>This approach is aligned with the Sustainable Residential Development in Urban Areas Guidelines which note that a net site excludes 'open spaces serving a wider area'. As part of the lands as zoned Z9, it is therefore expected that they serve a wider catchment than just that of the site. Residents have also noted that the current greenfield site is regularly used for a range of activities.</p>
<p><b>Plot ratio and coverage:</b> The site is located within a regeneration area, therefore the following requirements are applicable: Indicative plot ratio – 1.5-3.0 Indicative Site Coverage – 50-60%</p>	<p>The proposed development plot ratio is 1.55 and therefore accords with the indicative plot ratio of the Development Plan.</p> <p>The proposed Site Coverage is 30.4%. The Development plan notes that the applicable site coverage percentages are indicative rather than fixed. The proposed development will deliver a high-quality residential development with a significant quantum of public open space that will serve the perspective residents of the scheme and the wider area. It is therefore considered that the proposed site coverage percentage of 30.4% is acceptable.</p>
<p><b>Bicycle Parking Standards</b> Table 1 of appendix 5 sets out parking standards: Long stay: 1 space per bedroom in residential apartments</p>	<p>130 long-stay spaces are required for residential component of the development (38 to serve the 1-bed units, 50 to serve the 2-beds and 42 to serve the 3-beds). In terms of long stay spaces for community</p>

Standard	Development Response
<p>Short stay: 1 per two apartments</p> <p>Long stay: 1 space per 5 staff in community centre</p> <p>Short stay 1 per 100 sqm Gross Floor Area for community centre</p>	<p>uses, this gives rise to 1 space required. In total, 134 spaces are provided. The quantum complies with the required number of bicycle spaces at the site.</p> <p>38.5 short-stay spaces are required for the residential component. In terms of short stay spaces for community use, the proposed development gives rise to 1 space required. In total, the proposed development includes 41 short stay spaces are provided.</p> <p>The long stay parking will be secured in indoor bike rooms accessible by residents only. In addition to the long stay parking there will be on-street visitor parking provided along the front at core areas on Cardiffsbridge Road.</p>
<p><b>Car Parking Standards</b></p> <p>The site falls under Zone 2 – key transport corridor</p> <p>The requirement is for 1 per dwelling.</p>	<p>28 spaces are provided or a ratio of 0.36 per unit.</p> <p>The Development Plan notes that reduced car parking provision may be acceptable where the Council is satisfied that good public transport links are already available or planned and/or a Mobility Management Plan for the development demonstrates that a high percentage of modal shift in favour of the sustainable modes will be achieved through the development.</p>
<p><b>Electric Vehicles</b></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.</p>
<p><b>Motorcycle Parking</b></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>2 no. motorcycle spaces are proposed.</p>
<p><b>Waste Storage Facilities</b></p> <ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>2 no. dedicated waste storage areas are proposed to serve the development at ground level. Please refer to the site layout drawing prepared by SHA and the</p>

Standard	Development Response
<p>of nonreusable receptacles such as bags, ideally of 1,100 litre capacity, must be used.</p> <ul style="list-style-type: none"> <li>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.</li> <li>Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes.</li> </ul>	<p>Operational Waste Management Plan prepared by Traynor Environmental.</p>
<p><b>Green and Blue Roof</b></p> <p>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.</p> <p>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 the accompanying Engineering Report and drawing no. SHB4-WRF-DR-MOR-CS-P3-151 for typical roof details.</p>
<p><b>SuDS Requirements</b></p> <p>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>The proposed development has been designed in accordance with the standards and requirements of the Dublin City Development Plan. Please refer to the accompanying Engineering Report and drawing no. 150 prepared by Malone O’Regan.</p>
<p><b>Surface Water Management Planning</b></p> <p>Development including or in excess of 2 no. residential units or 100 sq. m. of non residential uses (including social and community uses)</p> <p>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 Engineering Report prepared by Malone O’Regan which includes details of the surface water management plan proposed as part of the project.</p>

## 8. ENVIRONMENTAL ASSESSMENTS

### 8.1 Environmental Impact Assessment

An Environmental Impact Assessment Screening prepared by MacCabe Durney Barnes accompanies this application. The report 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 has been prepared by NM Ecology and accompanies this Part 8 application. The assessment 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*
- *It will not have a significant impact on any species 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 Ecological Impact Assessment & Winter Bird Survey

An Ecological Impact Assessment (EclA) Report has been prepared by NM Ecology and accompanies this Part 8 application. A Winter Bird Survey Report has also been prepared and submitted as part of this application.

Existing grassland, flower borders / dry meadow and artificial surfaces will be cleared to accommodate the proposed development. According to the EclA, these habitats are currently of Negligible importance. The only Important Ecological Feature identified in this assessment is winter birds.

Winter Bird Surveys were conducted by a qualified Ecologist, Nick Marchant, NM Ecology. Bird surveys were carried out approximately every two weeks from late September 2023 to early April 2024, comprising a total of 14 surveys.

Geese were recorded on four occasions: 24 geese on 23 November 2023, 5 geese on 16 January 2024, 83 geese on 29 January 2024 and 3 geese on 29 February 2024. The flock of 83 geese fed on the Site for 1.5 hours, but on the other three occasions the geese were only present for a maximum of 30 minutes before being disturbed by pedestrians / dogs and leaving the Site. No geese were recorded during the other ten surveys. Based on these results, it was concluded that the Site is used on an occasional basis by brent geese, usually only in flocks of moderate importance. Potential impacts are considered in this report and in Section 5.1 of the accompanying Winter Bird Survey Report. Detailed results and conclusions are presented in the Winter Bird Survey Report that accompanies this application, but a summary is provided below.

*"The development of the Site would substantially change the extent and character of grassland at the Site, which would reduce it below the 0.7 ha threshold suggested by Benson (2009). It would also increase activity (and thus disturbance) by pedestrians and dog walkers. In combination, these factors would almost certainly make the Site unsuitable for brent geese in the future.*

*The large-scale study by Scott Cawley in 2017 identified 161 inland sites used by brent geese in Dublin, including 12 that supported populations of major importance (i.e. > 400 brent geese) for 4 – 5 consecutive years; these represent the most-important inland sites used by brent geese in Dublin. The Site was not one of the 161 sites identified in the Scott Cawley study, so its loss will not substantially reduce the known feeding network for this species in Dublin.*

*Geese displaced from the Site would have alternative feeding sites in the broader surroundings. Scott Cawley identified 7 potential grassland sites within 1.5 km of the Site (Table 2, Figure 1 of Winter Bird Survey), and recorded geese at 4 of them, including one site of Major importance (>400 brent geese recorded). These sites would be large enough to accommodate the small number of geese displaced from the Site.*

*Therefore, considering that brent geese were only recorded at the Site in relatively low numbers and on an occasional basis, that there is regular anthropogenic disturbance at the Site (by pedestrians, dogs, scramblers and sulkies), and that there are several sites nearby of higher foraging value, the development of the Site will have an imperceptible impact on brent geese associated with the SPAs in Dublin Bay. In the context of Appropriate Assessment screening, the proposed development will not be likely to have a significant effect on any European sites."*

## 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 accompanies this Part 8 application. The report 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 52.000m. 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).



The accompanying Archaeological Impact Assessment concludes and recommends:

*“A recent review of the archaeological evidence for a site at Cardiffsbridge Road, 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 a mix of 1 to 3-bed units, including universal designed units. It will make a positive contribution to the diversification of the housing stock in Finglas, Dublin 11. It will particularly allow for downsizing opportunities and 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 SDRA. It will create active frontage on the Cardiffsbridge Road and makes generous allocation for public open space and community, arts and cultural uses at the site.

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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