DOWNEY
29 Merrion Square, D02RW64

Planning Report and Statement of Consistency with Planning Policy for Proposed Large Scale Development

Lands at:
Elmfield,
Ninth Lock Road,
Clondalkin,
Dublin 22.

Applicant: Thornmeadow Developments Limited.

May 2026

TABLE OF CONTENTS

INTRODUCTION **4**

PART A – PLANNING REPORT **6**

1.0 SITE LOCATION AND DESCRIPTION **7**

2.0 PLANNING HISTORY **9**

2.1 Site Specific Planning History 9
2.2 Surrounding Planning History 9

3.0 PRE-PLANNING CONSULTATIONS **10**

3.1 Section 247 Pre-Application Consultation October 2025, LRDPP012/25 10
3.2 Section 32B Pre-Planning Consultation January 2026, LRDOP008/25 11

4.0 DEVELOPMENT DESCRIPTION **13**

5.0 PLANNING POLICY AND CONTEXT **19**

6.0 CONCLUSION **20**

PART B – STATEMENT OF CONSISTENCY **21**

7.0 NATIONAL PLANNING POLICY **22**

7.1 Project Ireland 2040: National Planning Framework First Revision (2025) 22
7.2 Project Ireland 2040: National Development Plan 2021-2030 23
7.3 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) 24
7.4 Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025) 28
7.5 Urban Development and Building Heights, Guidelines for Planning Authorities (2018) 33
7.6 Childcare Facilities: Guidelines for Planning Authorities (2001) 42
7.7 Design Manual for Urban Roads and Streets (DMURS) 43
7.8 Cycle Design Manual (2023) 43
7.9 EIA Directive 43
7.10 Bird and Habitats Directive - AA Screening & Natura Impact Statement 44
7.11 The Planning System and Flood Risk Guidelines (2009) 44
7.12 Transport Strategy for the Greater Dublin Area 2022-2042 45
7.13 EIA Directive 46
7.14 Climate Action Plan 2024 47

8.0 REGIONAL PLANNING POLICY **48**

8.1 Regional Spatial & Economic Strategy for the Eastern & Midland Region 48
8.2 Regional Spatial & Economic Strategy for the Eastern & Midland Region 50

9.0 LOCAL PLANNING POLICY **51**

9.1 South Dublin County Development Plan 2022 – 2028 51
9.1.1 Zoning 52
9.1.2 Core Strategy 52
9.1.3 Natural, Cultural and Built Heritage 54
9.1.4 Green Infrastructure 55
9.1.5 Quality Design and Healthy Placemaking 58
9.1.6 Housing 62
9.1.7 Sustainable Movement 65
9.1.8 Community Infrastructure and Open Space 66

9.3.9 Energy 68
9.2 Clondalkin Local Planning Framework 78
3.2.2 Climate Action and Infrastructure 79
3.2.3 Green Infrastructure 80
9.2.4 Sustainable Movement 82
9.2.5 Community, Homes and Employment 83
9.2.6 Conservation and Built Heritage 85
10.0 APPROPRIATE ASSESSMENT and EIA SCREENING 85
11.0 CONCLUSION 86

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Approved by	Donal Duffy MIPI Director	25/08/2026	FINAL_V_04

DOWNEY

INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02RW64, have prepared this Planning Report and Statement of Consistency on behalf of our client and applicant, Thornmeadow Developments Limited, for a proposed Large Scale Residential Development on lands at Elmfield, Ninth Lock Road, Clondalkin, Dublin 22.

Planning permission is being sought from South Dublin County Council in relation to the following proposed development:

Planning permission is being sought from South Dublin County Council in relation to the following proposed development:

"We, Thornmeadow Developments Limited, intend to apply for permission for a Large-Scale Residential Development on lands at the Securispeed Logistics site, Elmfield Industrial Estate, Ninth Lock Road, Clondalkin, Dublin 22.

The proposed development will consist of the demolition of the existing warehouses and structures on the site and the construction of a mixed-use residential led development comprising a total of 408 no. residential units (403 apartments consisting of 24 no. studio units, 230 no. 1 bed units and 149 no. 2 bed units, and 5 no. 3 bed 2 storey houses) and 1 no. childcare facility. The proposed development will comprise the following:

(a) Block 1 is a 9-storey mixed-use building comprising 64 apartments (32 no. 1 bedroom units, 32 no. 2 bedroom units), with associated private balconies; bin store; plant and switch room; esb substation; green roofs; pv panels at roof level and a childcare facility at ground level.

(b) Block 2 is a 5-storey apartment building comprising 114 apartments (24 no. studio units, 54 no. 1 bedroom units, 36 no. 2 bedroom units) with associated private balconies/terraces; bin stores; bicycle parking; plant rooms; a communal roof terrace at fourth floor level; green roofs and pv panels at roof level.

(c) Block 3 is a 5-storey apartment building comprising 112 apartments (68 no. 1 bedroom units, 44 no. 2 bedroom units) with associated private balconies/terraces; bicycle parking; bulky items stores; bin stores; plant and switch rooms; 2 no. esb substations; green roofs and pv panels at roof level.

(d) Block 4 is a 5-storey apartment building comprising 113 apartments (76 no. 1 bedroom units, 37 no. 2 bedroom units) with associated private balconies/terraces; bin stores; bicycle stores; bulky item stores; 2 no. esb substations; plant and switch rooms; green roofs and pv panels at roof level; and undercroft car parking (62 no. car parking spaces and 2 no. motorcycle parking spaces).

(e) 5 no. own-door houses (comprising 2 no. 2 storey, 3-bedroom detached units; and 3 no. 2 storey, 3-bedroom terraced units) with associated private balconies/terraces.

(f) The proposed development will also comprise 202 no. car parking spaces (140 spaces at surface level and 62 no. at undercroft level and including EV and Accessible spaces), 752 no. bicycle parking spaces (comprising short-term surface spaces, long-term spaces in bike stores

and cargo bike spaces), 2 no. motorcycle parking spaces, refuse and storage areas, plant, landscaping, open space, boundary treatment, public lighting, drainage, and all infrastructural and engineering works necessary to facilitate the proposed development, including connections to existing services at the Ninth Lock Road and New Nangor Road. Vehicular access will be via the existing industrial estate road off Ninth Lock Road. "

The proposed development has been developed in accordance with prevailing policy contained within the South Dublin County Development Plan 2022-2028, and will contribute to the realisation of the housing and population targets for the Clondalkin area. The submitted documents demonstrate that the proposed development will result in the creation of a sustainable residential community and provide for a greater range of accommodation within the local area.

The design team involved with preparing the proposed development is as follows:

- DOWNEY Charted Town Planners;
- O'Mahony Pike – Architects;
- GK Consulting Engineers - Engineers;
- Austen Landscape Architects – Landscape Architects;
- Lawlor Consulting – Mechanical and Electrical Engineers;
- Digital Dimensions – Daylight & Sunlight Analysis and 3D Dimensions;
- Independent Site Management Limited – Telecommunications;
- CM Arbour Ltd. - Arborist;
- PMCE Consulting Engineers – Traffic Consultants;
- McCloy Consulting Ltd – Flood Risk Consultants;
- Altemar Marine & Environmental Consulting. – Ecological Consultants;
- AWN Consulting Ltd – CEMP, OWMP and RWPM Consultant;
- Macro Works Ltd – Aviation Glint and Glare Consultants;
- RWDI ANEMOS LIMITED – Microclimate Consultants

PART A – PLANNING REPORT

1.0 SITE LOCATION AND DESCRIPTION



Figure 1: Site Location of proposed development (approximately outlined in red).

The site itself is irregular in shape and extends to approximately 2.66 hectares (gross) and a net developable site area of 2.2 hectares. It is bound to the north by a Lidl supermarket and mostly undeveloped open space lands of the Church of Jesus Christ Latter-day Saints, to the west by a mixed-use development and further Ninth Lock Road, to the south by the Ardale Property Group industrial lands, and to the east by the back gardens of the Riversdale Road residential estate.

There is currently a mix of uses on the site including the Securispeed courier service warehouse, the VSDirect marketing company, and the JM Work Wear retail building, all surrounded by car parking spaces as well as some grasslands.

There is also a mix of land uses in the vicinity of the subject site including residential, retail, commercial, educational, and health. This is reflective of the fact that the site is adjacent to the centre of Clondalkin. The wider surrounding lands contain mainly residential developments north of the village of Clondalkin, north along the Grand Canal and New Nangor Road, and on Monastery Road near the M50.



Figure 2: Map illustrating bus stops in immediate proximity to the site.

The area of Clondalkin benefits from its proximity to a wide range of transport networks, which includes connections to the M50, N7 and N4 roads, with the N7 being located to the south of the subject site. Several public bus service routes run through Clondalkin including the 76A, 51D and L54, with these routes connecting Clondalkin to more South Dublin areas such as Tallaght, areas outside Dublin such as Harristown, Co. Kildare, and Dublin City Centre. The Clondalkin/Fonthill Train Station is located approximately 1 km north of the subject site, which provides connects Clondalkin nationally to the wider areas of Ireland.

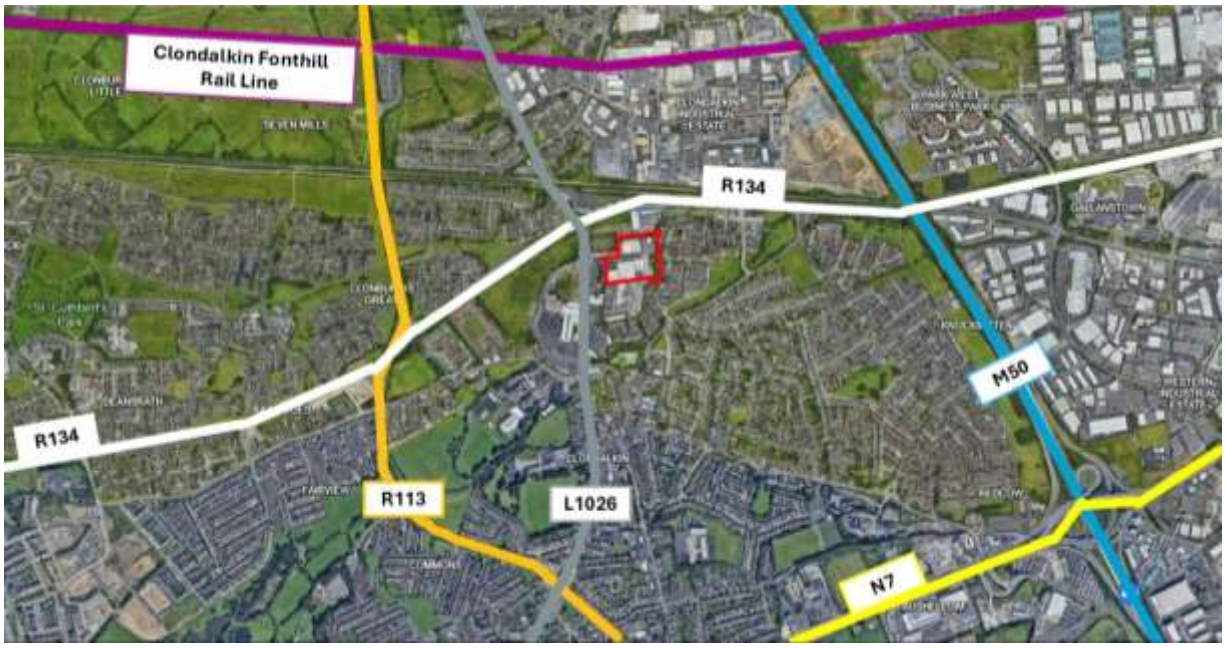


Figure 3: Wider context of the area, with transport networks highlighted (subject site outlined in red).

2.0 PLANNING HISTORY

DOWNEY have carried out an examination of the planning history of the subject site, which determined that there have been a number of planning applications made on the overall landholding for which this proposed development relates. These previous applications are set out as follows:

2.1 Site Specific Planning History

- **Reg. Ref. SD21A/0122** – By Order dated 13th June 2021, the Planning Authority granted permission to Securispeed Holdings Limited for a development consisting of the *"Erection of a marquee type structure with a floor area of 618sq.m as an extension to the side and rear of existing warehouse buildings."*

- **Reg. Ref. SD06A/0429** – By Order dated 6th September 2006, the Planning Authority granted retention permission to SHS Sales & Marketing Ltd. of a 2.65 metre high palisade fence for an approximate length of 38 metres located in the south east corner of the lands, and to the rear of house nos. 20-24 inclusive and part of house no. 19 Riversdale Road for changes to previously approved permission Reg. Ref. SD13A/0100 consisting of a 300mm increase in width of the Aldi retail unit resulting in an increase in floor area of 18sq.m; alterations to elevations consisting of a 1.494m height reduction to parapets to west and south elevations and removal of 1 window to the south elevation.

2.2 Surrounding Planning History

- **Reg. Ref. SD03A/0509** – By Order dated 29th October 2003, the Planning Authority granted permission to Triford Homes Ltd. for change of use of the existing ground floor Unit number 1, from Creche to Retail use at the previously approved development register refs: S99A/0700, S00A/0023, S00A/0708, SD02A/0171, SD02A/0290.

- **Reg. Ref. SD04A/0283** – By Order dated 13th August 2004, the Planning Authority granted planning permission to Andrew Griffith & Gavin Gallagher for alterations to previously approved development (Reg. Ref. SD02A/0290) to consist of the subdivision of retail unit no. 4 to form 3 no. separate retail units, provision of 3 no. shopfronts, lighting and associated signage at Elmfield Court. This application is concurrent with an application for change of use of 158.6 sq.m. of unit 4 from retail use to restaurant with hot food takeaway facility use.

- **Reg. Ref. SD08B/0389; ABP Ref. PL06S.230563**– By Order dated 24th July 2008, An Bord Pleanála overturned the decision of the Planning Authority and granted retention planning permission to Ms. Jean Feeney for a front entrance door and window.

- **Reg. Ref. SD08B/0049** – By Order dated 29th May 2008, the Planning Authority granted permission to John & Lorraine Moody for retention of extension to existing dwelling & retention of domestic shed to rear.

- **Reg. Ref. SD13A/0242** – By Order dated 06th February 2014, the Planning Authority granted permission to Ernst & Young (Receiver) for demolition of two industrial units with a combined

footprint of 2,760sq.m.; the removal of all hard surfaced parking areas, yards and all associated surface water and foul drainage. Permission also sought for the replacement of soft landscaping to replace demolished buildings and their associated hard surfaced areas.

3.0 PRE-PLANNING CONSULTATIONS

The proposed development, subject of this LRD planning application, has been informed by a Section 247 Meeting (LRDPP012/25) and Section 32B Meeting (LRDOP008/25) with South Dublin County Council. The changes and alterations to the proposed development following each of these meetings are described below.

3.1 Section 247 Pre-Application Consultation October 2025, LRDPP012/25

The Section 247 Pre-Planning Meeting was held via Microsoft Teams on 21st October 2025. The pre-planning Ref. No. for the meeting was LRDPP012/25. The following design was presented to the Council in October:



Figure 4: Proposed Site Plan with Ground Floor first LRD Section 247 Pre-Application Consultation October 2025.

This consultation meeting aided in informing the design of the proposed development now being intended to be lodged as a planning application to South Dublin County Council. The main items of concern were as the following:

- Concerns raised over lack of detail regarding the proposed links and permeability of the site.

- Clarity on alignment of roads between surrounding sites and potential conflict with North-South permeability.
- Requested footpaths to be indicated.
- Concerns were raised over the useability of green space and the proposed blocks directly fronting green spaces.
- Concern regarding dominance of surface-level car parking.
- Require appropriate setback from pylon.
- Parking to the north is disjointed and usability of the open space to the north should be assessed.
- Natural play area too close to the pylon.
- Retain existing tree line, hedgerow.
- Reconfigure dwellings along eastern boundary of the site to preserve as much green space as possible.
- Concern with perpendicular parking on road.
- Consider entrance to creche.

The consultation resulted in the design team giving further due consideration to the design of the proposed development, its permeability, useability of green space, car parking dominance and creche design. This ultimately helped to inform the design of the proposed development, and revisions of the proposal submitted under the official 32B LRD Pre-Planning meeting.

3.2 Section 32B Pre-Planning Consultation January 2026, LRDOP008/25

The Stage 2 LRD Pre-Planning Meeting was held via Microsoft Teams on 28th January 2026 (SDCC Ref. LRDOP008/25). The following design was presented to the Council in October:



Figure 5: Proposed Site Plan with Ground Floor first LRD Section 32B Pre-Application Consultation January 2026.

The main items of concern were as the following:

- In terms of urban design and pedestrian safety and comfort, and the allowance of space for users and uses other than car parking, the quantity and arrangement of car parking in the scheme is excessive, and this is considered to constitute a constraint on residential density.

In response to the Council's concern, O'Mahony Pike Architects have prepared an updated Site Layout Plan and associated Architectural drawings which reduce the extent of surface car parking within the centre of the proposed development, while maintaining the overall number of parking spaces through their redistribution across the site. This has been made possible through the site now providing undercroft parking.

- The site's red line boundary should be extended to take in the access road to the west, to better configure the junction at the site access, and to provide for improvements to the public realm west of the site.

Oakfield Road is now included within the red line boundary of the subject site. The inclusion of Oakfield Road within the development will ensure significant improvement to the road with the continued cycle lane and overall pedestrian route from Ninth Lock Road through to Riversdale Estate. This will improve the permeability of the site while also helping to achieve SM4 Objective 1 of the Clondalkin Local Planning Framework.

- A more generous provision should be provided for the main east-west pedestrian and cyclist route through the site, facilitating a link to the east with a safe, comfortable and open character.

As previously mentioned, the final development now includes the Oakfield Road within the proposal which provides a continuous route from the subject site to Ninth Lock Road. The pedestrian and cycle paths are also provided independently through the site which ensures sufficient space for both pedestrians and cyclists accessing the site.

This provision of high-quality cycle infrastructure supports the broader objective of promoting compact, walkable communities that minimise environmental impacts and encourage the use of alternative transport modes, aligning with SPPR 3 of the Sustainable Residential Development and Compact Settlements Guidelines. The Planning Authority are invited to refer to the report by GK Consulting for further detail.

- Inactive facades and material treatment of facades should be reconsidered as per the recommendations in the Council's Opinion Report.

The final proposed development incorporates a varied palette of building materials together with a series of setbacks throughout the site, creating visual diversity within the scheme and ensuring that the development is consistent with, and complementary to, the established architecture and character of Clondalkin Village.

- Detailed compliance needed with the relevant policies and objectives of the Clondalkin Local Planning Framework as well as include details of how the scheme will integrate and reflect the historic Clondalkin Village.

The Council is invited to refer to Part B, Section 3 of this Planning Report and Statement of Consistency which specifically details the policies and objectives relevant to the subject site and how the proposed development ensures to comply with them.

- The applicant shall submit a GSF calculation detailing how they have achieved the appropriate minimum Green Space Factor (GSF) scoring.

The proposed development provides a GSF of 0.54, which is compliant with South Dublin Development Plan 2022-2028 and Variation 1 Clondalkin Local Planning Framework.

- Details of play spaces, along with further comments outlined in the attached

Natural play areas have been relocated further away from the pylon, ensuring no conflicting activity underneath pylons. Austen Landscape Architects have prepared a final Landscape Report and associated drawings which provide significant detail into the proposed play areas for the subject site.

The design team have taken cognisance of the comments made by various South Dublin County Council departments; in which the design of the scheme has been amended in greater detail. The revised development now provides for 409 residential units within four building blocks ranging in height from 2 to 9 storeys. The proposed development now provides for an under croft on the site to ensure there is an overall increase in car parking spaces on the site, as requested by the Council, however with the relocation of the parking spaces from the central route through the site. Permeability links have been provided throughout the site with East to West pedestrian link from Oakfield Road to Riversdale residential estate, aligning with the Clondalkin Planning Framework.

DOWNEY have prepared a Statement of Response to South Dublin County Council's LRD Opinion which was issued on 10th February 2026. The Council is invited to refer to the statement of response in conjunction with all drawings and documentation submitted as part of this planning application.

4.0 DEVELOPMENT DESCRIPTION

As noted previously within this report, the proposed development, which is subject to this Planning Application, provides for the following:

"We, Thornmeadow Developments Limited, intend to apply for permission for a Large-Scale Residential Development on lands at the Securispeed Logistics site, Elmfield Industrial Estate, Ninth Lock Road, Clondalkin, Dublin 22.

The proposed development will consist of the demolition of the existing warehouses and structures on the site and the construction of a mixed-use residential led development comprising a total of 408 no. residential units (403 apartments consisting of 24 no. studio units, 230 no. 1 bed units and 149 no. 2 bed units, and 5 no. 3 bed 2 storey houses) and 1 no. childcare facility. The proposed development will comprise the following:

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(d) Block 4 is a 5-storey apartment building comprising 113 apartments (76 no. 1 bedroom units, 37 no. 2 bedroom units) with associated private balconies/terraces; bin stores; bicycle stores; bulky item stores; 2 no. esb substations; plant and switch rooms; green roofs and pv panels at roof level; and undercroft car parking (62 no. car parking spaces and 2 no. motorcycle parking spaces).

(e) 5 no. own-door houses (comprising 2 no. 2 storey, 3-bedroom detached units; and 3 no. 2 storey, 3-bedroom terraced units) with associated private balconies/terraces.

(f) The proposed development will also comprise 202 no. car parking spaces (140 spaces at surface level and 62 no. at undercroft level and including EV and Accessible spaces), 752 no. bicycle parking spaces (comprising short-term surface spaces, long-term spaces in bike stores and cargo bike spaces), 2no. motorcycle parking spaces refuse and storage areas, plant, landscaping, open space, boundary treatment, public lighting, drainage, and all infrastructural and engineering works necessary to facilitate the proposed development, including connections to existing services at the Ninth Lock Road and New Nangor Road. Vehicular access will be via the existing industrial estate road off Ninth Lock Road."

Key Statistics of Proposed Development

The table below gives an overview of the key data of the proposed development.

Total Red Line Area:	2.66 Ha
Total Ownership Boundary Area	2.3 Ha
Units	408
Studio	24 (6%)
1-bed units	230 (56%)
2-bed units	149 (37%)
3-bed units	5 (1%)
Dual Aspect	180 units (44%)
Density	185dph (net)
Car Parking Spaces	202
Bicycle Parking Spaces	752
Motorbike Parking Spaces	2
Plot Ratio (Gross Site Area)	1.19
Plot Ratio (Net Site Area)	1.44

Site Coverage (Gross Site Area)	30.30%
Site Coverage (Net Site Area)	36.60%
Part V Units	82 units
Public Open Space	3468qm
Non-Residential Uses	1 no. childcare facility (350 sq.m.)

Table 1: Proposed Development Details.

The proposed development at Elmfield, Ninth Lock Road, Clondalkin, Dublin 22, represents a thoughtfully considered, high-quality residential scheme that responds positively to its surrounding urban context, while delivering much-needed new housing in a central and well-serviced location. As noted, the scheme comprises 408 no. residential apartments arranged across four carefully articulated apartment blocks and 5 no. own-door dwellings. The main access to the site will remain the same as the existing entrance; via Oakfield Road and further Ninth Lock Road.

The development comprises a well-balanced mix of unit types, including studios, one-bedroom units, two-bedroom units and three-bedroom units in a mix of apartments and houses. All units are designed with an emphasis on quality, functionality, liveability, and benefit from private amenity space in the form of terraces or balconies. These are orientated to maximise daylight and natural ventilation, with aspects distributed across all orientations, contributing to an inclusive and sustainable living environment.

There are a variety of heights between the blocks and dwellings proposed as part of this development, consisting of 2 to 9 storeys. The most significant height is being proposed within Block A1 (9 storeys). This building is located to the northwest of the site nearing to The Church of Jesus Christ of Latter-day Saints and Ninth Lock Road. This location within the site is proposed to accommodate the highest building to help provide a landmark building at the entrance to the site. The remaining apartment blocks range in height from 2-5 storeys, with the taller elements being centralised within the scheme to help consolidate the height within the centre of the development, helping to provide a gradual increase in height from the lower rise buildings surrounding the subject site.

Furthermore, the proposed development has been designed to ensure compliance with the South Dublin County Council and Variation No. 1 Clondalkin Local Planning Framework. In line with the policies and objectives of these plans the proposed development provides a cycle and pedestrian path through the site from east to west boundaries. The proposed development is also proposing to include the Oakfield Road within the red line boundary, which results in the development connecting directly to Ninth Lock Road. This has been included in the proposed development following the Council's feedback from the Opinion Report. The inclusion of Oakfield Road within the red line boundary of the site, results in the proposed development providing significant upgrades to this road with the integration of the proposed cycle link directly to Ninth Lock Road through to Riversdale residential estate, which helps to achieve a key goal of the Clondalkin Local Planning Framework.

All apartment units have been designed in accordance with the pertaining Development Plan standards and '*Design Standards for Apartments, Guidelines for Planning Authorities*' Guidelines complying with or exceeding the minimum standards by at least 10% as per the aforementioned Guidelines. The proposed apartments have been designed to maximise opportunities for dual aspect

units. We invite the Planning Authority to refer to the Schedule of Accommodation (SOA) prepared by O' Mahony Pike for further information in this regard.

In terms of public open space, the proposed development is providing a large public open space within the centre of the site. This design ensures a vibrant high-quality area of public open space to be enjoyed by all which will improve the overall pedestrian and cyclist permeability across this are of Clondalkin. For further detail the Council is invited to refer to the landscape pack prepared by Austen Landscape Architects.

All selected materials within the development are of high-quality, low maintenance and durable. The variety of materials ranging from red brick to render are consistent with the architectural style that is depicted within this area of Clondalkin overall. The materials chosen for the proposed development as well as the façades of the buildings have been redesigned to ensure that the Council's comments following the Section 32B Pre-Planning Meeting have been addressed. The distinct composition of the proposed scheme alongside the chosen materials have been chosen to align with the Clondalkin Local Planning Framework to ensure a positive contribution and integration with the surrounding area.

Additionally, the proposed development is also including a childcare facility, communal refuse storage areas, plant rooms, a new ESB substation, hard and soft landscaping, new boundary treatments, and associated drainage works. The design also incorporates biodiverse 'green' roofs, solar panels, and the SUDs all contributing to surface water management, biodiversity, and energy efficiency. Please refer to the Engineer and Landscape drawings and reports submitted as part of this application for further details.

The proposal represents a sustainable and efficient use of a centrally located site within walking distance of key public transport nodes, employment opportunities and a full range of local amenities. It is particularly well-suited to a wide demographic, be it young professionals, older people, downsizers, small families or city-based workers, providing appropriately scaled accommodation within a vibrant, well-connected urban neighbourhood.

Overall, this proposal exemplifies a high standard of design and planning, making a meaningful contribution to the regeneration of this part of Dublin 22. It supports city-wide housing objectives, promotes sustainable development principles, and provides a distinctive yet contextually respectful addition to the existing urban fabric. For further details, please refer to the accompanying plans, sections, and elevations prepared by O'Mahony Pike Architects.

Density

The proposed residential scheme, delivering 408 no. units at a net density of approximately 153 units per hectare, represents an appropriate and sustainable response to its urban context. Located within a highly accessible area of Dublin 22. The site benefits from excellent connectivity to public transport, employment hubs, educational institutions, and a broad range of local services. The density proposed aligns comfortably with the guidance set out in the *2024 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, which advocate residential densities in the range 50 dph to 250 dph (net) generally being applied in urban neighbourhood zones of Dublin and Cork. As such, the scheme contributes directly to the objectives of the *National Planning Framework*, including compact growth, efficient land use, and the creation of vibrant, walkable communities.

Notably, the unit mix, comprising studios, one-bedroom, two-bedroom and three-bedroom apartment units has been carefully chosen by the applicant to address the diverse demographic needs, including young professionals, smaller and younger family households, older persons, and downsizers. This balanced approach to tenure and typology also aligns with the *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)* and reinforces the role of this site in delivering compact, high-quality living accommodation in a location ideally suited for increased residential intensity.

Proposed 408 Residential Units

The proposed 408 residential apartment units are as follows:

- Studio – 24 units – 6% of total development (all studios exceed minimum floor area requirements)
- 1 bed 2person – 230 units – 56% of total development - (all 1 beds exceed minimum floor area requirements)
- 2 bed Units – 149 units – 37% of total development - (all 2 beds exceed minimum floor area requirements)
- 3 bed - 5 units – 1% of total development – (all 3 beds exceed minimum floor area requirements)

All proposed apartment units exceed both internal and external space standards as set out within the Planning Design Standards for Apartments Guidelines for Planning Authorities (2025). Please also refer to that of the provided architectural drawing pack and HQA both prepared by O'Mahony Pike Architects.

Landscape and Open Space

The proposed development places a strong emphasis on high-quality landscaping and the provision of well-designed public and communal amenity space, which will contribute positively to the overall residential environment. The communal open spaces have been designed to be located within the naturally enclosed blocks, helping to provide a level of privacy and shelter. Central to the scheme is a landscaped public open space, which is thoughtfully designed to serve as a secure, accessible, and welcoming space for the public and residents. The public open spaces are dispersed throughout the site helping to provide various landscaped natural areas around the site. There are also dedicated children's play areas located throughout the development, complemented by strategically located seating areas, encouraging informal social interaction and supporting community cohesion.

The inclusion of permeable paving ensures that appropriate sustainable drainage measures are incorporated, mitigating surface water runoff while contributing to the visual quality of the space. Overall, the landscaping strategy not only enhances the residential amenity of the development but also promotes health, wellbeing, and social engagement in a safe and attractive setting, consistent with best practice urban design and placemaking principles. SDCC is invited to review that of the provided landscaping plans prepared by Austen Landscape Architects, for further information in this regard.



Figure 7. Extract from the landscaping masterplan as proposed and prepared by Austen Landscape Architects.

Part V

It is considered that the proposed development is consistent with the Affordable Housing Act 2021, Housing Circular 28/2021, and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing. For further details, please refer to the enclosed Part V drawings prepared by O' Mahony Pike Architects. It is noted that the applicant has engaged the Housing Section of South Dublin County Council prior to final planning application lodgement, and a Letter of Validation has been obtained and submitted under separate cover with this application.

The Part V units are dispersed throughout the development within both Block 3 and Block 4. There is a total of 81 no. units in total (20%) being provided for the overall proposed development.

Demolition

The proposed development is applying for demolition of the existing 3 no. commercial buildings currently located on the subject site. Demolition plans and relevant waste management plans are provided as part of the final planning application. The demolition of these buildings is required and justified in order to facilitate a redevelopment of the subject site. It is also noted that this is plan-led, noting that the Clondalkin Local Planning Framework also identifies the site for redevelopment.

5.0 PLANNING POLICY AND CONTEXT

The proposed development is consistent with the relevant national, regional, and local planning policies as they pertain to these lands. In this regard, Part B of this report contains a Statement of Consistency with Planning Policy. To avoid undue repetition, the Council is invited to refer to Part B of this report to confirm how the proposal is consistent with the relevant national, regional, and local planning policy.

Notwithstanding this, it is important to confirm the fundamental planning policies as they relate to the site, particularly land use zoning. Under the South Dublin Development Plan 2022-2028, the subject site is zoned *'Town Centre.'* The key objectives for areas under the Town Centre zoning designation are '*to protect, improve and provide for the future development of Town Centres'*. In relation to the permittable uses within the 'Town Centre' zoning objective, the proposed development is considered permittable in principle.

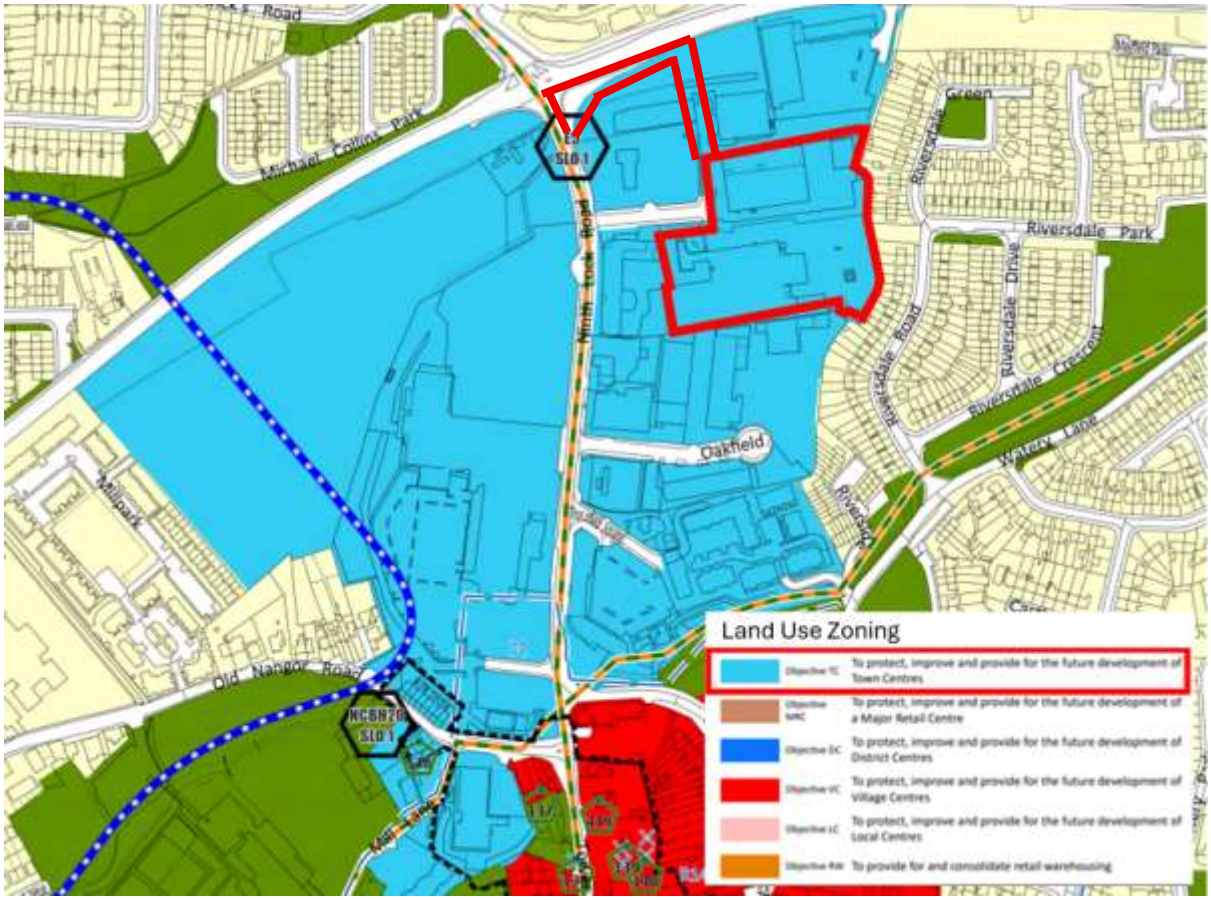


Figure 8: Land Use Zoning Map Extracted from the County Development Plan (application site outlined in red).

6.0 CONCLUSION

This planning report has been prepared in support of the proposed residential development on land at Elmfield, Ninth Lock Road, Clondalkin, Dublin 22. Planning permission is sought for the demolition of the existing commercial buildings on the site and the construction of a Large-Scale Residential Development comprising a total of 408 no. residential units, a creche and all associated ancillary site development and infrastructure works including foul and surface water drainage, internal roads, cycle paths and footpaths, boundary treatments and landscaping

The proposed scheme pertaining to this application will provide for an appropriate density of residential development within this appropriately zoned site, which is within walking distance of the LUAS and Dublin Bus core public transport routes. The development will maximise the efficiency of the urban land, retain the compact form of the urban area, and help to meet housing demand in accordance with Governmental Policy and Guidance.

The applicant has previously engaged in Stage 1 and Stage 2 Pre-Planning Consultation with South Dublin County Council and has received Stage 3 LRD Opinion. The applicant has sought to address all items raised during these consultation periods. A full Statement of Response to South Dublin County Council's LRD Opinion Report has been prepared by DOWNEY and is submitted under separate cover. DOWNEY, on behalf of the applicant, now wishes to submit this Stage 4 LRD Planning Application to South Dublin County Council. DOWNEY trust that the enclosed plans and particulars pertaining to this application are in order and look forward to a favourable decision from South Dublin County Council in due course.

PART B – STATEMENT OF CONSISTENCY

7.0 NATIONAL PLANNING POLICY

7.1 Project Ireland 2040: National Planning Framework First Revision (2025)

The NPF outlines a number of strategies and policy objectives. There is a major new policy emphasis on compact growth and urban consolidation. In terms of 'compact growth', the NPF targets a great proportion (40%) of future housing developments to be within and close to the existing footprint of built-up areas.

The NPF states that, "*the long-term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future*." The NPF acknowledges the unique and complex nature of Ireland's urban structure and accordingly suggests the need for a range of complementary strategies in the context of planning for future growth.

The following National Policy Objectives (NPOs) set out how the NPF seeks to sustainably develop much needed residential housing in appropriate locations.

> ***NPO 4:*** *A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.*
>
> ***NPO 12****: "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."*
>
> ***NPO 14****: "Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."*
>
> ***NPO 20:*** *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*
>
> ***NPO 26:*** *"Continue to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services."*
>
> ***NPO 37:*** *"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages."*
>
> ***NPO 42: "****To target the delivery of 50,00 additional households per annum to 2040."*

NPO 43: *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*

NPO 44: *Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.*

NPO 45: *"Increase residential density in settlements through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights and more compact forms of development."*

The proposed development consists of 408 no. residential dwellings on appropriately zoned suburban site in Clondalkin. The proposed development offers an appropriate housing type and size, that supports the densification of the site and will help to meet some of the demand for housing in Clondalkin.

The proposed development aligns with the National Planning Framework (NPF) and its overarching aims, in particular, its strategy for compact growth and increased housing supply within existing built-up areas. It contributes to the achievement of National Policy Objective 45 and other relevant NPF goals, representing proper planning and sustainable development of the site and surrounding area. This policy alignment is further reinforced at regional and local levels, with more detailed objectives addressed in the following sections.

DOWNEY are of the considered opinion that the proposed development is in line with the objectives of the National Planning Framework providing compact, yet effective development required to address the housing crisis and provide for needed housing requirements.

7.2 Project Ireland 2040: National Development Plan 2021-2030

Project Ireland 2040 National Planning Framework (NPF), which sets the overarching spatial strategy for the next twenty years, includes the National Development Plan, which sets out the ten-year investment strategy. The recent Review of the NDP was led by the National Investment Office in the Department of Public Expenditure and Reform and was structured in two phases with associated outputs. The review was founded upon a strongly evidence-based approach, building upon the extensive data and analyses that have been produced by the NIO and by the work of IGEES and other policy units across other Government Departments and agencies, including other newly commissioned and targeted research. The NDP sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in Housing for All and will enable a step-change in investment to ameliorate the effects of climate change.

Outlined in the NDP, the key achievements of NPF over 2018-2021 and in relation to housing include delivery of over 63,000 homes and 26,256 new social housing homes. To underpin NPF population targets, a detailed assessment of structural housing demand identifies demand for almost 400,000 new homes in Ireland between 2020 and 2031, or 33,000 new homes per annum. At city and county level, this is broken down to form a Housing Supply Target (HST) for each local authority area, to guide planning for future development.

The NPF housing supply target has been refined to reflect recent (2020) ESRI research based on NPF population growth, taking into account both existing demand and a legacy of undersupply to date. There is now a need to accommodate around 600,000 new households by 2040, with the Department of Housing planning to deliver an average of 33,000 homes per annum to 2030 including an average of 10,000 new social homes each year and an average of 6,000 affordable homes each year.

Set out in the NDP, public capital investment must, as a top priority, support the delivery and location of the homes that society will need over the next decade and beyond, while also ensuring that in the future the pattern of housing development underpins the development of more compact higher-density cities, towns and other areas. It is also a priority to enable infill development, with up to 50% of future housing in our cities and major urban centres and 30% elsewhere to be provided within existing built-up areas serviced by existing facilities and along high-capacity public transport corridors.

The proposed development will provide high density, sustainable residential development in close proximity to a high frequency bus network, LUAS line, and cycling infrastructure, all of which promotes compact urban growth and a good quality of life.

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

Published in January 2024, the aim of these guidelines is to set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements.

In summary, key elements of the Guidelines include:

- Change to density standards, based on geography and accessibility.
- Reduced garden sizes.
- Reduced separation distance from 22 metres to 16 metres.
- Reduced car parking standards.
- Increased bicycle parking standards.

Section 3.0 – Settlement, Place and Density of the guidelines sets out the guidance for growth priorities for each tier of the settlement hierarchy and their residential density. Clondalkin is identified as' City – Centre' within the Cities and Metropolitan (MASP) Areas Settlement, which are defined within the guidelines as follows:

> *"The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods, are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork."*

In relation to Section 3.4 of the guidelines, a Community and Social Infrastructure Audit has been carried out in relation to the proposed development; its density has been refined in regard to its proximity and accessibility to services and public transport. As such, the proposed 185 dph is

considered to be of an appropriate density in compliance with the settlement hierarchy's density of 100-300 dph.

As stated within the guidelines *"there is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth".*

The following Special Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

SPPR 1 - Separation Distances:

> *It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include objective(s) in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level.*
>
> *When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 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.*
>
> *There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.*

The proposed development provides for significant separation distances throughout the development with each of the apartment blocks exceeding 20 metres of separation. In terms of the 5 no. 3-bedroom dwellings on site, the orientation of these units ensures that there are no opposing windows which serve habitable rooms within the development. Therefore, the proposed development ensures compliance with SPPR1 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

SPPR 2 - Minimum Private Open Space Standards for Houses:

> *Apartments and duplex 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 2022 (and any subsequent updates). For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g., sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.*

DOWNEY submit that the proposed development is compliant with SPPR 2 as each dwelling on the site is provided with above the minimum requirement of private open space. For more information, South Dublin County Council are invited to refer to the SOA prepared by O' Mahoney Pike Architects, which is submitted in conjunction with this final LRD planning application.

SPPR 3 - Car Parking:

> *It is a specific planning policy requirement of these Guidelines that:*
>
> *(i) 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, should be 1 no. space per dwelling.*
>
> *(ii) In accessible urban locations, defined in Chapter 3 Table 3.7, car parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, should be 1.5 no. spaces per dwelling.*
>
> *(iii) In intermediate and peripheral locations, defined in Chapter 3 Table 3.7, the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, should be 2 no. spaces per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision.*

The proposed development is located on a town centre zoned site that is in the centre of Clondalkin and is well served by existing and planned public transport. The site is located within 350 metres from a Dublin Bus stop which is facilitated currently by a number of frequent buses. This bus stop is also part of the future Bus Connects Corridor upgrade which will provide direct access to the City Centre via the core bus route D. This has not yet been implemented, however it is planned to be. Another bus stop is located under 250 metres from the site. The site is also 1.5km from Clondalkin Fonthill train station which is serviced by a commuter train which facilitates direct access to the City Centre in approximately 30 minutes.

This results in the site being within a high-capacity public transport node or interchange of Dublin city, resulting in the car parking provision being substantially reduced or wholly eliminated. The proposed development falls within a *"city centre and urban neighbourhood"* location, according to the Compact Guidelines classification. In line with this classification and following consultation with the Council, car-parking provision will be minimised, and a maximum of 1 no. car parking space per dwelling is applicable at this site. Accordingly, the proposed development provides a reduced rate of car parking for the site, due to its proximity to public transport links, with an overall total of 202 no. car parking spaces being provided for the development (0.5 Spaces per unit). Further details of this can be found within the Traffic Assessment and MMP by PMCE Consulting Engineers.

SPPR 4 - Cycle Parking and Storage:

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:

(i) ***Quantity*** *- in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking shall also be provided. 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. It will be important also to make provision for cargo and electric bikes and for individual lockers.*

(ii) ***Design*** *– cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel personally safe; and in this regard secure cage or compound facilities, with electronic access for cyclists and CCTV, afford an increased level of security for residents. Effective security for cycle storage is also maximised by the provision of individual cycle lockers and it is best practice that planning authorities ensure that either secure cycle cage/compound or preferably locker facilities are provided.*

In accordance with SPPR 4 of the Guidelines, a total of 752 cycle parking spaces is being provided. Full details of the location of bicycle storage for each apartment block is provided within the plans prepared by O' Mahony Pike Architects and submitted under separate cover.

Furthermore, as outlined in **Policy & Objectives 5.1** of the Compact Settlement Guidelines:

> *It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). 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. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.*
>
> *In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.*

> *In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.*

The proposed development includes a total of 3,468 sq.m of public open space, throughout the site. This represents 16% of the gross developable site area, exceeding the requirements set out in both the Development Plan and the Compact Settlements Guidelines. DOWNEY note that, the measured quantum of public open space does not include the area beneath the overhead power lines.

A further, 3100 sqm of communal open space is provided at ground level and at podium level for the enjoyment of the future residents. This not only surpasses the relevant policies and requirements but also creates an active network of public and semi-private green spaces, which will significantly contribute to the promotion of green infrastructure, reinforcing the broader environmental and community objectives for Clondalkin.

DOWNEY are of the considered opinion that the proposed development has been designed to be in line with these subject guidelines. As can be observed in particulars submitted with this application, the new guidelines have had a significant impact on density, separation distances, bicycle parking provision and various other elements of this subject proposed application.

7.4 Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)

The Guidelines constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended) and all planning authorities are to have regard to these Guidelines as they take precedence over any conflicting policies. The Guidelines state that it is "*critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures*."

The Guidelines state that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish and European averages in numbers of households living in apartments and the importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

The Guidelines also have specific planning policy requirements (SPPRs), which include:

Housing Mix – SPPR 1:

> *(a) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment*

developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(b) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.

The proposed development fully complies with SPPR 1 of the Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025). The unit mix for the development is displayed in the following table:

Blocks 1 - 4					
	Studio	**1 Bed**	**2 Bed (3 Person)**	**3 Bed**	**Total**
Total	30	229	145	5	409
Percentage Mix %	7%	56%	35%	1%	100%

Table 2: Mix of Units of Proposed Development.

The mix of units outlined above contributes valuable diversity to the proposed unit mix. These units help accommodate a wider range of households, including small families, couples, downsizers, professionals and those seeking more generous living arrangements. The resulting mix demonstrates a balanced and inclusive approach to apartment provision. The proposed unit mix also supports the principles and goals of the National Planning Framework, supporting compact growth, sustainable urban living and the creation of inclusive and vibrant communities.

Apartment Floor Areas - SPPR 2:

The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- *Studio apartment (1 person) 32 sq. m*
- *1-bedroom apartment (2 persons) 45 sq. m*
- *2-bedroom apartment (3-persons) 63 sq. m.*
- *2-bedroom apartment (4 persons) 73 sq. m*
- *3-bedroom apartment (4-persons) 76 sq. m.*
- *3-bedroom apartment (5 persons) 90 sq. m*

In the interests of delivering sustainable and good quality urban development, these Guidelines should be applied in a way that ensures a good mix of apartment sizes. Accordingly, at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes.

The proposed development complies with the new standards outlined above as all of the apartments meet the minimum requirements and all the apartments meet these guidelines with majority of the apartments comfortably exceeding the guidelines. Full details of which can be found in the HQA, prepared by O' Mahony Pike Architects attached under separate cover.

Dual Aspect – SPPR 3:

> *"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:*
>
> *(i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.*
>
> *(ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."*

The subject development provides for approximately 44% of the units to be dual aspect, which is almost double the minimum requirement set out under SPPR 3 of the Guidelines.

Floor to Ceiling Height (SPPR 4)

> *"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality."*

All proposed ground floor units comply with SPPR 4 as they meet or exceed 2.7m ceiling height, while all upper floors meet with or exceed 2.4m ceiling heights.

The following requirements are set within the statutory plans regarding internal storage requirements:

<u>Internal Storage</u>

Studio	3 sq. m.
1-bedroom apartment (2 persons)	3 sq. m.
2-bedroom apartment (3 persons)	5 sq. m.
2-bedroom apartment (4 persons)	6 sq. m.
3-bedroom apartment (4 persons)	6 sq. m.

(Modified by DOWNEY)

Apartment schemes should provide storage for bulky items outside individual units. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, the storage requirement may be relaxed in part, on a case-by-case basis, subject to overall design quality.

The proposed development complies with these new guidelines by meeting and/or exceeding the minimum internal storage requirements for the overall scheme. The proposed development now provides 126 sqm of bulky item storage, as well as the required amounts of bin storage and internal bicycle storage. The need for adequate amounts of storage was highlighted by the Planning Authority during pre-planning stages of the proposed development and has been delivered as part of the final planning application.

Private Amenity Space

Studio	4 sq. m.
1-bedroom apartment (2 persons)	5 sq. m.
2-bedroom apartment (3 persons)	6 sq. m.
2-bedroom apartment (4 persons)	7 sq. m.
3-bedroom apartment (4 persons)	7 sq. m.

(Modified by DOWNEY)

The proposed development complies with these new guidelines by meeting and/or exceeding the private amenity space requirements of all the apartments. Further information relating to the breakdown of private open space is provided within the SOA, prepared by O' Mahoney Pike Architects.

Communal Amenity Space

The overall development is provided with a total of 3,100 sq.m. of Communal Open Space. This greatly exceeds the requirement to provide 1,979 s.qm. when measured against the mix of units. On a Block-by-Block basis, the provision is measured against the required level per block as follows and confirms that the scheme provides the correct quantum of communal open space for each block as well as cumulatively.

Block 1				
Required	Studios	1 beds	2 beds	Total
Required per unit	4 sqm	5 sqm	6 sqm	
No. of units	0	32	32	64
Total Required	0	160 sqm	192 sqm	352 sqm
Total Provided				360 sqm

Block 2A				
Required	Studios	1 beds	2 beds	Total
Required per unit	4 sqm	5 sqm	6 sqm	
No. of units	12	30	19	61
Total Required	48 sqm	150 sqm	114 sqm	312 sqm
Total Provided				1,095 sqm

Block 2B				
Required	Studios	1 bed	2 beds	Total
Required per unit	4 sqm	5 sqm	6 sqm	
No. of units	12	24	17	53

Total Required	48 sqm	120 sqm	102 sqm	270 sqm
Total Provided				1,095 sqm

Block 03A				
Required	Studios	1 beds	2 beds	Total
Required per unit	4 sqm	5 sqm	6 sqm	
No. of units	0	40	25	65
Total Required	0	200 sqm	150 sqm	350 sqm
Total Provided				1,095 sqm

Block 03B				
Required	Studios	1 beds	2 beds	Total
Required per unit	0 sqm	5 sqm	6 sqm	
No. of units	0	34	19	53
Total Required		170 sqm	114 sqm	284 sqm
Total Provided				740 sqm

Block 04A				
Required	Studios	1 beds	2 beds	Total
Required per unit	4 sqm	5 sqm	6 sqm	
No. of units	0	34	19	53
Total Required	0	170 sqm	114 sqm	284 sqm
Total Provided				765 sqm

Block 04B				
Required	Studios	1 beds	2 beds	Total
Required per unit	4 sqm	5 sqm	6 sqm	
No. of units	0	42	18	60
Total Required	0	210 sqm	108 sqm	318 sqm
Total Provided				765 sqm

Table 3: Block By Block breakdown of Proposed Communal Open Space.

In terms of Children's Play areas, the proposed development has considered the recreational needs of children and incorporates children's play areas as part of the communal amenity spaces within the scheme. As stated within the Guidelines:

> *"Children's play needs around the apartment building should be catered for:*
> - *within the private open space associated with individual apartments;*
> - *within small play spaces (about 85-100 sq. m) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*

- *within play areas (200-400 sq. m) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms."*

The proposed landscape plan submitted with the development, prepared by Austen Landscape Architects, provides for a mix of small play spaces for children. These spaces are provided with safe access and are located at ground level. Therefore, it is submitted that the proposed development is consistent with the Guidelines in this regard. For further information in this regard, please refer to the landscape drawings and report that has been prepared by Austen Landscape Architects and submitted under separate cover of the application.

In relation to bicycle and car parking requirements, the Guidelines outline the importance of bicycle parking within apartment schemes, while also stating that car parking provision should be substantially reduced where feasible. The Guidelines refers to the Sustainable Residential Development Compact Settlement Guidelines for the quantum of parking required in new schemes. In this regard, it is proposed to provide for a total of 752 no. bicycle spaces, in high quality, safe and accessible locations throughout the scheme, and 202no. car parking spaces in accordance with the pertaining Guidelines.

7.5 Urban Development and Building Heights, Guidelines for Planning Authorities (2018)

The '*Urban Development and Building Heights, Guidelines for Planning Authorities'* are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibly and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that *"a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels".*

The document states that it is critically important that development plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only desirable but a fundamental policy requirement. Locations with the potential for comprehensive urban development or redevelopment should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

Section 1.10 of the Guidelines state "*the rationale (…) for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas*". It continues, "*in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys*

at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality".

Section 1.11 states "*these guidelines therefore set out national planning policy that:*

- *Expand on the requirements of the National Planning Framework; and*
- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations".*

The Guidelines go on to state that "*in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.*"

The following Specific Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

> **Specific Planning Policy Requirement 1** – *"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height"*.

The proposed development is situated at a strategic location within the centre of Clondalkin which is capable of supporting taller buildings and increased density, as outlined within SDCC Development Plan 2022-2028 and Clondalkin Local Planning Framework. The site is excellently served by public transport, including rail and bus, with a proposed Bus Connects route designed to serve the site. The development provides a residential scheme ranging in height from 2-9 storeys, which is considered to be acceptable at this site location.

> **Specific Planning Policy Requirement 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. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social, and community infrastructure, including leisure facilities"*.

The proposed development seeks to provide for 409 no. residential apartment units. Additionally, the site is well-served by a range of existing educational, healthcare, and community facilities within

its vicinity. Residents will also benefit from exceptional recreational and leisure amenities. In this regard, a Community and Social Infrastructure Audit has been prepared by DOWNEY and is enclosed with this LRD application. This audit provides a detailed overview and assessment of the existing social infrastructure and facilities in the area, ensuring that the proposed development aligns with relevant planning policies and adequately meets the needs of the community. We respectfully invite the Council to refer to the aforesaid report for further details.

> **Specific Planning Policy Requirement 3 –** "*It is a specific planning policy requirement that, where;*
>
> *(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
>
> *2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*
>
> *Then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise."*

The proposed development seeks to provide for a residential development. It is respectfully submitted that the following section outlines how the proposal is consistent with the relevant national, regional, and local planning policy as it pertains to the site and its environs. Such documents include architectural plans and elevations, architectural urban design statements, a non-statutory masterplan, DMURS statements, Traffic and Transport Assessment, AA Screening, bat surveys, planning reports, engineering reports and daylight and shadow analysis, and as such the development accords with SPPR 3.

Section 3.2 of the Guidelines sets out development management principles and criteria that proposals for higher buildings are to be assessed against. The Development Management Principles are in accordance with and consistent with securing the objectives of the NPF and South Dublin County Development Plan. The Development Management Criteria are as follows:

It is clear from the decision of the Court of Appeal that, in cases where SPPR3(A) applies, this requires a planning authority to undertake the assessment of a development proposal against the development management criteria contained in Chapter 3 of the Guidelines – namely the criteria specified in detail in section 3.2 of the Building Height Guidelines.

As set out below, it is respectfully submitted that the application meets that threshold.

Development Management Criteria in Section 3.2 of the Guidelines:	
At the scale of the relevant city/town	
Criteria of Guidelines	**Evaluation and consistency of proposed development**

The site is well served by public transport with high capacity, frequent service, and good links to other modes of public transport.	The subject site is excellently well served by public transport, particularly Dublin Bus and the proposed Bus Connects which will further improve the public transportation offerings. The site is also within walking distance of Clondalkin/Fonthill Train Station offering further transport connections to and from the city centre and beyond. For further details on this, South Dublin County Council are invited to refer to the Traffic and Transport Assessment prepared by PMCE Engineering Consultants.
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 of key views. Such development proposals shall undertake a landscape and visual assessment by a suitably qualified landscape architect.	The proposed development includes building heights ranging in height from 2-9 storeys. The design strategy locates lower heights (2-storeys) around the eastern side of the site (and in between Block 2A and 2B), in closest proximity to existing residential properties beyond the site at Riversdale Green Estate, in order to minimise potential impacts on the residential amenities of these properties in relation to overlooking, daylight and sunlight impact, overshadowing and overbearing. The proposed increase in height at Block 1 will help to create a strong urban edge facing Ninth Lock Road as well as adding to the placemaking design for the scheme. There are no protected structures within or adjoining the site and it is not within an Architectural Conservation Area. However, the Clondalkin Round Tower lies to the south of the site and is further separated from the site by the Mill Centre. Noting this feature, care has been taken to ensure that the building heights do not impact on its setting.
On larger 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.	The proposed development is designed to include new open spaces and pedestrian/cyclist routes which serve to create permeability towards the east-west direction at the centre of the site. The proposal will reactivate this centrally located site in Clondalkin. The scheme will deliver a density of 185 units per hectare through the provision of a range of architectural styles and contrasting scales within the

	development, with the buildings ranging in heights of 2-9 storeys across the site. As noted above, the proposed development responds to the scale of adjoining development through the varied use of building heights (lower along the eastern edges) and the creation of generous separation distances between the taller elements of the scheme and neighbouring properties.
At the scale of the district/neighbourhood/street:	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal will inherently improve the existing streetscape through the provision of public open space and significant public realm improvements as well as introducing active street frontages. The scheme will also help to provide a Permeability link through the site which is specifically identified as an objective within the Clondalkin Local Planning Framework as follows: *"Ninth Lock Road - Riversdale Potential link through the north of Oakfield industrial estate from Ninth Lock to Riversdale. This linkage would create a safer active travel option towards the Ninth Lock road."* The proposed development will provide dedicated pedestrian and cycle infrastructure which is directly identified in this Framework. The proposed development will also provide a childcare facility at ground floor level of Block 1, at the entrance of the site. It is submitted that with the location of the creche and the provision of a pedestrian and cycle link through the site will ensure active streetscapes.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials/building fabric well considered.	The subject development comprises a mix of dwelling types and scales, ranging from own-door 2 storey houses to apartment blocks ranging from 2-9 storeys in height. The development provides for a simple palette of high-quality materials in order to provide appropriate visual variety to the elevations and the massing of the buildings. The proposed materiality of the buildings is complimentary of the existing architectural style of Clondalkin.

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).	The proposed development will provide new publicly accessible open spaces that enhance the overall quality of the public realm. The introduction of these spaces, along with a dedicated pedestrian and cycle route through the site, will significantly contribute to the site's integration with its surroundings and promote greater connectivity. Regarding flood risk, a Flood Risk Assessment has been prepared by McCloy Consulting and is submitted under separate cover. The proposed development has resulted in creating no off-site flood risk.
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.	The proposed development will introduce a new residential development and associated childcare facility to the site. This will help to enhance and integrate the site into public/community use. The site is currently occupied by industrial warehousing units which are not publicly accessible nor inviting. The proposed development will help to integrate this centrally located site in the town of Clondalkin.
The proposal positively contributes to the mix of uses and/or building/ dwelling typologies available in the neighbourhood.	The proposed development will deliver a mix of uses including residential and childcare. These uses will contribute to the existing services available within the area. The proposal will deliver a range of residential unit types that will serve a wide range of household types. The unit mix will include Studio, 1-, and 2-, apartments as well as own-door houses which will bring further customers into the area. The Council is invited to refer to the Community and Social Infrastructure Audit for further information in relation to the services available in the area.
At the scale of the site/building	
The form, massing and height of the proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	The design of the development ensures that there will not be adverse overshadowing or loss of daylight and sunlight to adjoining properties. Building heights, particularly those adjacent to existing housing to the east and west of the site, have been designed to reduce in height to help minimise overshadowing impacts.

	The enclosed Daylight & Sunlight Report, prepared by Digital Dimensions, concluded that the proposed development would have minimum to insignificant effects in terms of overshadowing within and surrounding the site.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd Edition) or BS 8206-2:2008 – 'Layout for Buildings – Part 2 Code of Practice for Daylighting'.	As set out in detail in the enclosed Daylight & Sunlight Report, prepared by Digital Dimensions, the proposed development is assessed having regard to the BRE 'Site Layout Planning for Daylight and Sunlight' Requirements, which confirms that daylight and sunlight assessment undertaken, accords in full, with the methodology set out in the above referenced guidance. The proposed development provides high levels of daylight and sunlight throughout all the proposed apartments and does not adversely impact upon the surrounding developments. Further information on Daylight and Sunlight is addressed in the Daylight and Sunlight Report prepared by Digital Dimensions.
Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	As noted above, the daylight, sunlight and overshadowing assessments demonstrate an excellent level of compliance with the target values set out in the BRE Guidelines. While the public open space provision is slightly adversely affected by overshadowing from Blocks 3 and 4. The remaining plots of public open space ensure that there is an adequate amount of public open space provided with enough daylight and sunlight.
Specific Assessment	

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 microclimatic effects where taller buildings are clustered.	RWDI Wind Consulting Engineers prepared a Pedestrian Level Wind Desk-Based Assessment to provide a micro-climate analysis of the proposed development. This confirms that the development will primarily not be negatively affected by micro-climatic factors. While some effect may be experienced at corner elements, these are mitigated by specific landscape proposals, as outlined in the Landscape Design Report, prepared by Austen Landscape Architects.
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.	The site is not located within an environmentally, ecologically or architecturally sensitive location which is detailed within the Appropriate Screening for the site. Bird surveys and bat surveys were carried out by Altemar Environmental Consultants as part of the application process at optimal times of the year. The survey did not identify any adverse impacts on bird's species within the area, nor did it identify any birds of international conservation importance. 2 bats were identified on the southern boundary of the site (one Leisler's Bat and one Common Pipistrelle). No bats were detected emerging from any of the onsite structures in 2025 or 2026. No negative impacts on roosting bats are expected to result from the proposed development. Careful consideration has been made in regards to the design of the proposed development and its mitigation measures for bats, the applicant is open to any conditions made by the council in relation to further mitigation measures to maintain the existing bat conditions on-site.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	There are no radio frequency or microwave links that will be impacted by the height and scale of the development. Independent Site Management Limited, prepared a Telecommunications Impact Assessment in support of the proposed development, which provides further information on telecommunication channels.
An assessment that the proposal maintains safe air navigation.	The proposed height of the development will not affect air navigation or result in any undue glare.

	An Aeronautical Assessment has been prepared, and the Planning Authority are invited to refer to it for further details.
An Urban Design Statement including as appropriate, impact on the historic building environment.	An Urban Design Statement has been prepared by O' Mahony Pike Architects, which is submitted under separate cover as part of the application. This sets out the existing context of the site along with the rationale for design approach and assessment of receiving environment.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	The proposed development is sub-threshold for a mandatory EIA and is not directly connected to any environmentally sensitive sites. An Appropriate Assessment Screening and Ecological Impact Assessment has been prepared by Altemar and are submitted under separate cover.

Table 4: Mix of Units of Proposed Development.

It is evident from the foregoing that the proposal is in accordance with these Guidelines.

> **Specific Planning Policy Requirement 4** – *"It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*
>
> 1. *The 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;*
> 2. *A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
> 3. *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"*.

The proposed development provides for a development of 408 no. units (density of 185 units per hectare) across 4 no. apartment blocks and 5 no. 3-Bedroom dwellings that will range in height from 2-9 storeys. It is respectfully submitted that the density proposed is in accordance with the national guidelines referred to in SPPR 4.

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines with building heights for urban developments and that greater heights and taller buildings are achievable. The proposed development at Clondalkin is very well served by existing public transport networks, along with proposed future 'BusConnects' improvements and therefore can be expected to achieve high density residential development.

7.6 Childcare Facilities: Guidelines for Planning Authorities (2001)

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

The following definition of Childcare is included in the Guidelines:

> *"In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education, and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines."*

The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The recommendations provided within the Guidelines must be considered in the context of the '*Sustainable Urban Housing: Design Standards for New Apartments'* (2018), which state that:

> *"Notwithstanding the Department's Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile for the area."*

According to the apartment guidelines, "*one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms*".

Excluding the 1-bedroom apartment units from the overall provision for 408 no. residential units, this leaves a total of 154 no. units (149 no. 2-bed units & 5 no. 3-bed units) that can be deemed to accommodate families and therefore may generate demand for childcare places. However, there are a lot of 2-bed/3-person units, it is likely that not all of the 2 bed units will comprise family units and as such a reduced demand is likely. The Apartment Guidelines also advise that a reduce quantum of 2-bedroom units may be assessed when considering childcare demand. In this regard, a reduction of 50% is being applied. Therefore, a total of 80 units are considered as being able to generate demand for childcare. Based off of the calculations outlined in the Community and Social Infrastructure Audit prepared by DOWNEY, there is demand for a creche to accommodate 13 children within the proposed development.

DOWNEY submit that on the basis of 408 units with the current unit mix proposed, and in light of current guidelines relating to the provision of childcare facilities, the provision of a creche facility of

c.350sqm, would significantly exceed the minimum requirement for this scale of development and would provide for the anticipated demand of 13 no. childcare spaces, as outlined above.

7.7 Design Manual for Urban Roads and Streets (DMURS)

The '*Design Manual for Urban Roads and Streets*' (DMURS) 2013 and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The report prepared by GK Consulting Engineers provide further details in respect of the compliance of the proposed development with the provision of DMURS.

7.8 Cycle Design Manual (2023)

The *'Cycle Design Manual'* 2023 embraces the Principles of Sustainable Safety as this will offer a safe traffic environment for all road users, including cyclists. It offers guidance on integrating cycling infrastructure in the design of urban areas.

- The Manual gives guidance on the design requirements for cycle lanes, cycle parking infrastructure as well as safety and comfort.

It is submitted that connections in the proposed development have been addressed by provision of high standard and prioritised cycle infrastructure within the immediate local area, and it is also important to note that priority to pedestrian and cycle movements have been integral to the overall design and master planning of the subject lands. The subject site is also immediately adjacent to the Grand Canal greenway providing a direct pedestrian and cycle link between Grange Castle, Adamstown and Dublin City Centre, which supports and promotes a modal shift to sustainable transportation. Please refer to the enclosed reports, drawings and documentation prepared by GK Consultant Engineers for further information.

As part of the proposed scheme, there is a direct connection between Ninth Lock Road and Riverside Residential Estate which is directly highlighted as SM4 Objective 1 of the Clondalkin Framework Plan for the subject site. The proposed development will provide this objective as well as further extending out of the site to provide future improved connectivity and permeability through to Ninth Lock Road from the site via Oakfield Road.

7.9 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4(2) outlines Annex 2 projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member

States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

Development projects requiring an Environmental Impact Assessment Report (EIAR) are set out in Schedule Five of the Planning and Development Regulations, 2001 (as amended). Part 1 of this schedule lists those projects that require a mandatory EIA irrespective of size in any EU Member State whereas Part II identifies the threshold limits for projects that require a mandatory EIA in Ireland. Article 10(b)(i) of Part II 'Infrastructure Projects' indicates that an EIA is required for the construction of more than 500 dwellings. Another threshold is the size of the development site and in this regard, Article 10(b)(iv) requires that an EIAR be prepared for urban developments which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

In this instance, the application site is 2.66 hectares in size, in a built-up area and the proposal seeks the construction of only 408 no. dwellings. Therefore, the project does not exceed these requirements and therefore does not require an EIAR. DOWNEY have prepared an EIA Screening Report as part of the final application.

7.10 Bird and Habitats Directive - AA Screening & Natura Impact Statement

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). Altemar Environmental Consultants Ltd. have prepared the necessary Screening for Appropriate Assessment for the proposed development. This screening report has evaluated the proposed development at Clondalkin to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use. The AA Screening, prepared by Altemar, notes that there is no requirement to undertake an NIS.

7.11 The Planning System and Flood Risk Guidelines (2009)

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered, and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a Site-Specific Flood Risk Assessment.

In accordance with these Guidelines, a flood risk assessment has been prepared by McCloy Consulting Ltd. and submitted under separate cover of this application. This assessment confirms the proposed development site does not fall within a current scenario Flood Zone 'A'. However the site is located within Flood Zone 'B'.

The design team have designed the site to be consistent with the above flooding regulations, along with the proposed development not resulting in any flooding outside of the site. This has been achieved through the development being constructed at a higher ground level to or Flood Zone 'B', or a mid-range or high-end future climate change scenario Flood Zone 'A'. A limited area in the northeastern corner of the proposed development site falls within a mid-range and high-end future climate change scenario Flood Zone 'B'. The vast majority of the site falls within Flood Zone 'C'. The Assessment also indicates that the site is not at risk of pluvial or groundwater flooding.

The potential volume of displaced or offset high-end future climate change 0.1% AEP + CC (1 in 1000 year + climate change) flood waters, calculated as approximately 240m^3, shall be compensated for via the provision of an appropriately designed and constructed flood storage compensatory storage area.

It is recommended that the building structures associated with the development as proposed are constructed to a minimum finished ground floor level of 0.3m above the peak high-end future climate change scenario 0.1% AEP + CC (1 in 1000 year + climate change) flood level, i.e. 55.14m OD + 0.3m = **55.44m OD (Malin).**

The development as proposed is considered to comply with the requirements of the Justification Test as per The Planning System & Flood Risk Management Guidelines. The development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere.

Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy. For further information in this regard, please refer to the enclosed Flood Risk Assessment prepared by McCloy Consulting.

In accordance with these Guidelines, McCloy Consulting have carried out a Site-Specific Flood Risk Assessment. The site has been assessed in accordance with the Flood Risk Management Guidelines, with appropriate mitigation measures proposed such as SuDs design, attenuation ponds, overland flood routing, appropriate floor levels, and regular inspections.

7.12 Transport Strategy for the Greater Dublin Area 2022-2042

Prepared by National Transport Authority and in accordance with Section 12 of the Dublin Transport Authority Act, 2008, Transport Strategy for the Greater Dublin Area 2022-2042 (Transport Strategy) replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016-2035, which was approved by the then Minister for Transport, Tourism and Sport in 2016.

The Transport Strategy sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow, and Kildare, over the period of the strategy and has been approved by the Minister for Transport in accordance with the relevant legislation.

The overall aim of the Transport Strategy is:

> "*To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy*."

Four objectives have been developed to support the delivery of the overall aim of the Transport Strategy, as follows:

> *"**5.3.1** An Enhanced Natural and Built Environment: To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, increasing walking, cycling and public transport use, and reducing car dependency.*
>
> ***5.3.2** Connected Communities and Better Quality of Life: To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.*
>
> ***5.3.3** A Strong Sustainable Economy: To support sustainable economic activity and growth by improving the opportunity for people to travel for work or business where and when they need to, and facilitating the efficient movement of goods.*
>
> ***5.3.4** An Inclusive Transport System: To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society."*

The proposed development at Clondalkin which seeks to develop a strategic site within close distance of a rail line/LUAS/bus network—and a new Bus Connects route and lands for a potential rail line incorporated within the development lands, is considered an appropriate form of development in the context of supporting the vision and objectives of the Transport Strategy for the Greater Dublin Area 2022-2042.

7.13 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4(2) outlines Annex 2 projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

Development projects requiring an Environmental Impact Assessment Report (EIAR) are set out in Schedule Five of the Planning and Development Regulations, 2001 (as amended). Part 1 of this schedule lists those projects that require a mandatory EIA irrespective of size in any EU Member State whereas Part II identifies the threshold limits for projects that require a mandatory EIA in Ireland. Article 10(b)(i) of Part II 'Infrastructure Projects' indicates that an EIA is required for the construction

of more than 500 dwellings. Another threshold is the size of the development site and in this regard, Article 10(b)(iv) requires that an EIAR be prepared for urban developments which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

In this instance, the application site extends to c.2.25 hectares, within what can be considered a built-up area. The proposal seeks the construction of 408 no. dwellings and 1 no. childcare facility. Therefore, the project does not meet or exceed the stated threshold for projects exceeding 500 no. dwellings, and an EIA is therefore not required on this basis.

7.14 Climate Action Plan 2024

Climate Action Plan 2024 is the third annual update to Ireland's Climate Action Plan 2019 and the second to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. The Climate Action Plan 2024 builds on the introduction of carbon budgets and sectoral emissions ceilings in Climate Action Plan 2023 and sets a course for Ireland's targets to halve emissions by 2030 and reach net-zero no later than 2050.

This updated plan recognizes the increasing urgency of climate action and aligns with Ireland's enhanced commitments under the European Green Deal and international climate agreements. The Plan comprehensively identifies the challenges and opportunities across key sectors, including Electricity, Transport, Built Environment, Industry, and Agriculture. It sets out a pathway to achieve legally binding carbon budgets and sectoral emissions ceilings, targeting a 51% reduction in greenhouse gas emissions by 2030 and net zero by 2050. Key governance measures are strengthened, including a reinforced role for the Climate Change Advisory Council, transparent reporting mechanisms to the Oireachtas, and a focus on carbon-proofing policies at all levels.

The Plan emphasizes the role of the built environment, which remains a significant source of emissions, accounting for 12.3% of Ireland's greenhouse gases in 2022. To address this, the Plan prioritises improving energy efficiency through:

- Accelerated retrofitting to achieve deep retrofits for 75,000 homes annually.
- Expansion of district heating networks.
- Transition from fossil fuel heating systems to renewable alternatives, such as heat pumps.
- Implementation of near Zero Energy Building (nZEB) standards for all new developments.

The Plan aims to ensure climate resilience through outlining measures to improve building fabric, optimize solar gains, and enhance ventilation while reducing thermal bridging. The adoption of renewable energy systems, high performance materials and sustainable construction strategies ensures both carbon minimisation and improved living standards. These measures make buildings more comfortable; more cost effective to heat and healthier.

The Climate Action Plan 2024 also focuses on enhancing electric vehicle infrastructure, with expanded on street charging options and dedicated facilities in new developments to support the transition to low emission transport.

Through these measures, the Plan underscores the leadership role of the Government, public bodies, and communities in delivering transformative action. It reaffirms Ireland's commitment to a sustainable and equitable transition to a low carbon future, ensuring resilience and prosperity for all.

The scheme has been designed to allow all the dwellings achieve nZEB status, meaning they will need a low amount of energy, which will be fuelled mainly by renewable energy sources. Measures adopted include optimised location for solar gains and optimal window sizes for daylighting, a high amount of insulation to floors, walls and roofs and careful detailing to limit thermal bridging. The use of high-performance windows and doors, careful airtight detailing, and a designed ventilation system will limit heat loss and ensure thermal comfort. As such, the proposed development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions in line with the requirements of the Action Plan. The Planning Authority are invited to refer to the Climate and Sustainability and the Energy & Climate Action Reports prepared by Lawlor Consulting, which are submitted under separate cover.

8.0 REGIONAL PLANNING POLICY

8.1 Regional Spatial & Economic Strategy for the Eastern & Midland Region

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment and infrastructure capacity.

In conjunction with the NPF, the RSES predicts Dublin City and Suburbs to experience continued population growth over the period 2019-2031 with a predicted increase of 220,000. The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal is the following:

> **Regional Policy Objective (RPO) 4.3** – *"Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects."*

The proposed development at Ninth Lock Road, Clondalkin is located within a currently underutilised brownfield site, and provides for a high-density residential development in close proximity of a train station/LUAS and a high frequency bus network. As part of the proposed scheme, a Bus Connects route on New Nangor Road has been incorporated to the subject lands and aims to facilitate the delivery of

this important public transport project. It is considered that the proposed development is consistent with the aforementioned objective.

In relation to Settlement Strategies, Regional Policy Objective (RPO) 4.2 of the RSES set out the rationale and basis for infrastructure investment.

> **Regional Policy Objective 4.8**- *"Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded."*

It is submitted that the proposed development on existing zoned, serviced lands adheres with the policies and objectives of the RSES for the Eastern & Midland Regional Assembly area and will contribute by providing a high quality infrastructure which will further service the existing Clondalkin area and which aims to gain a more connected town centre with the incorporation of a Bus Connects route within the subject lands and promoting pedestrian/cycle networks as part of the proposed development. The provision of additional housing units and pertaining infrastructure on different phases is consistent with the objective set out above.

> **Regional Policy Objective (RPO) 5.4 –** *"Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines, and 'Urban Development and Building Heights Guidelines for Planning Authorities'."*

It is submitted that the provision of a high quality and high-density residential development consisting of 409 no. apartment units at Clondalkin will help in achieving this objective and it also complies with the policies and standards for the area. For further details on how the proposed development is in accordance with this policy, please refer to the Architectural Design Statement prepared by O' Mahony Pike Architects, which are included as part of the architectural planning packs.

> **Regional Policy Objective (RPO) 5.5 –** *"Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns."*

The RSES identifies Clondalkin as being within Dublin City and its suburbs and forming part of the Western Suburbs which offers large scale urban expansion creating new communities along the Southwestern Corridor (Kildare line/DART and LUAS redline). The proposed infrastructure for the

corridor includes a DART expansion to Cellbridge-Hazelhatch, LIHAF roads and railway bridge, and a new rail station.

Other relevant policies include, but are not limited to:

> ***Town Centre Renewal - RPO 6.12:*** *Local authorities shall include objectives in development plans and local area plans supporting emphasis on placemaking for town centres, for example through inclusion of a Placemaking Strategy for towns and implementation of Town Centre Renewal Plans.*
>
> ***Diverse and Inclusive Region RPO 9.1:*** *Local authorities shall ensure the integration of age friendly and family friendly strategies in development plans and other relevant local policy and decision making, including provision for flexible housing typologies, buildings and public spaces that are designed so that everyone, including older people, disabled people and people with young children can move around with ease, avoiding separation or segregation.*
>
> ***RPO 9.2:*** *Support local authority and sectoral initiatives to increase active participation and social integration of minority groups, including non-Irish nationals and Travellers.*
>
> ***Healthy Placemaking - RPO 9.10:*** *In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.*
>
> ***RPO 9.11:*** *Local authorities shall support the preparation of Design Guidelines to provide for improvements in the appearance of streetscapes and for revitalising spaces for example with cost effective, temporary uses that build on the longer-term vision for space.*

The proposed development places a significant focus on the public realm and on the placemaking role of the development to ensure it integrates appropriately with the surrounding areas. The development will provide a significant public benefit to the area through the creation of a pedestrian and cycle link through the site. This will increase the level of permeability throughout the area of Clondalkin as well as ensure that South Dublin County Council's objectives for the site are fulfilled, specifically referring to **SM5 Objective 4:** *"To ensure that new development and key lands maximise the potential for active travel connectivity between areas outside the village centre, including the Ninth Lock Framework site, to the village centre, local services and schools and to public transport."* And Figure 5.9 of the Clondalkin Local Planning Framework. Therefore, directly improving the connectivity and revitalising the subject site with compliance to the local policies and objectives of the area.

8.2 Regional Spatial & Economic Strategy for the Eastern & Midland Region

Prepared by National Transport Authority and in accordance with Section 12 of the Dublin Transport Authority Act, 2008, Transport Strategy for the Greater Dublin Area 2022-2042 (Transport Strategy)

replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016-2035, which was approved by the then Minister for Transport, Tourism and Sport in 2016.

The Transport Strategy sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow, and Kildare, over the period of the strategy and has been approved by the Minister for Transport in accordance with the relevant legislation.

The overall aim of the Transport Strategy is:

> "*To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy*."

Four objectives have been developed to support the delivery of the overall aim of the Transport Strategy, as follows:

> ***5.3.1*** *An Enhanced Natural and Built Environment: To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, increasing walking, cycling and public transport use, and reducing car dependency.*
>
> ***5.3.2*** *Connected Communities and Better Quality of Life: To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.*
>
> ***5.3.3*** *A Strong Sustainable Economy: To support sustainable economic activity and growth by improving the opportunity for people to travel for work or business where and when they need to, and facilitating the efficient movement of goods.*
>
> ***5.3.4*** *An Inclusive Transport System: To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society."*

The proposed development at Clondalkin which seeks to develop a strategic site within close distance of a rail line/LUAS/bus network—and a new Bus Connects route and lands for a potential rail line incorporated within the development lands, is considered an appropriate form of development in the context of supporting the vision and objectives of the Transport Strategy for the Greater Dublin Area 2022-2042.

9.0 LOCAL PLANNING POLICY

9.1 South Dublin County Development Plan 2022 – 2028

The subject site is located within the functional area of South Dublin County Council. The development of the site is therefore informed by the policies and objectives of the South Dublin County Council Development Plan 2022-2028. The policies and objectives of the Development Plan are underpinned by the following vision:

> *"In 2028 South Dublin will be a place that our communities are proud of, that our businesses can thrive in and that will help us to live greener and healthier lives."*

9.1.1 Zoning:

Under the South Dublin Development Plan 2022-2028, the subject site is zoned *'Town Centre.'* The key objectives for areas under the Town Center zoning designation are '*to protect, improve and provide for the future development of Town Centres'*.

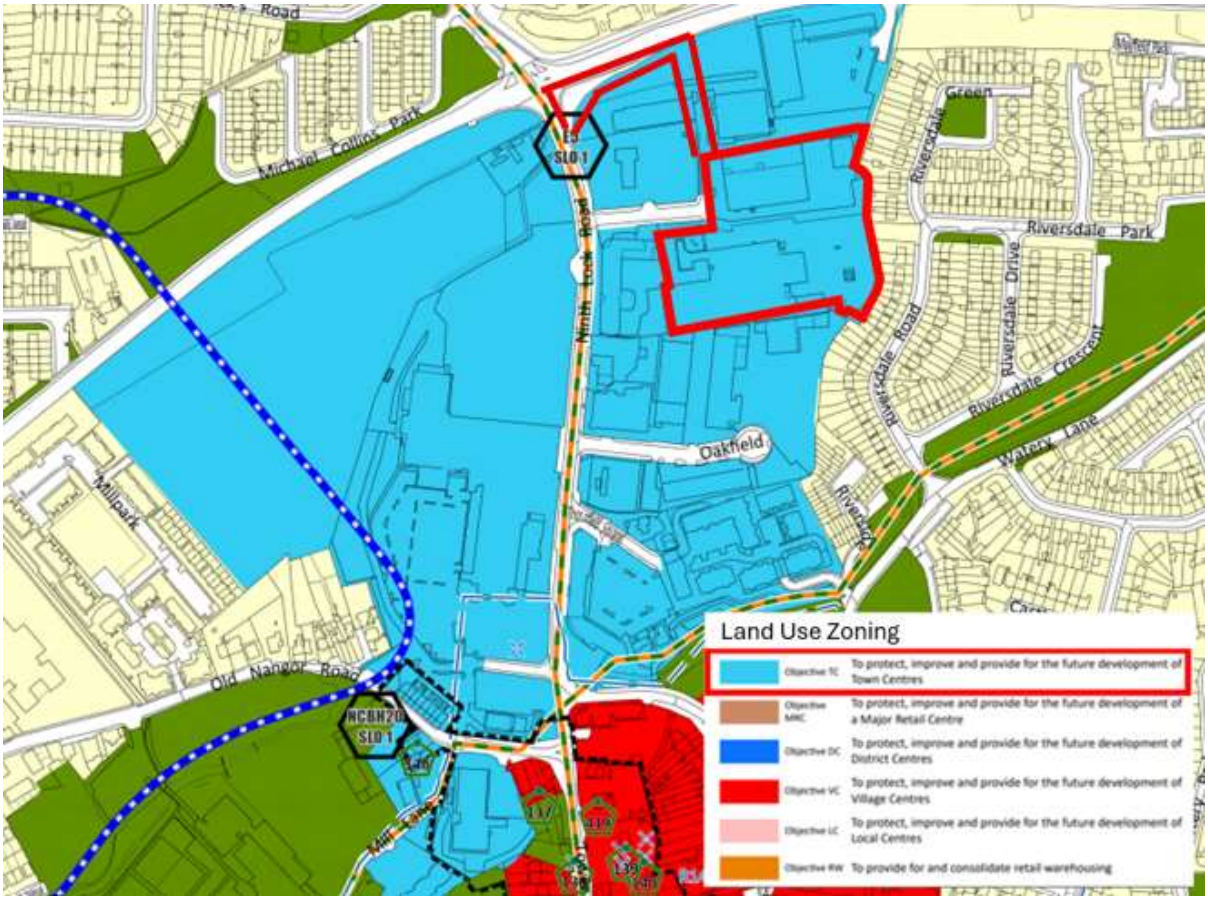


Figure 9: Land Use Zoning Map 5 Extracted from the County Development Plan (application site outlined in red).

In relation to the permittable uses within the 'Town Centre' zoning objective, the proposed uses and development is permittable in principle.

9.1.2 Core Strategy:

The purpose of the Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

The vision for the core strategy is to:

> *"Maximise the potential of the County to deliver a compact settlement form in line with National and Regional population targets, with a strong focus on regeneration and the redevelopment of brownfield over greenfield lands."*

The Core Strategy and Settlement Strategy quantitatively demonstrates how much land is required to meet the residential and employment needs of an additional 45,000 people (approximate) up to the

year 2028. The existing Development Plan states: *"To provide for this level of growth in line with National policy, a need for 23,730 new homes between the Census year 2016 to 2028 within the County has been identified".*

The Settlement Hierarchy identifies Clondalkin as part of the *'Dublin City and Suburbs'*, these areas are strong active urban places within the Metropolitan Area with strong transport links. As such, *"The continued development of the various urban centres in Dublin City and Suburbs will provide for new mixed-use development as the engine to drive growth in the urban environment. A key component of this Development Plan is to support the consolidation of these key urban areas with more local day to day services focused within local centres as the plan strives towards a 10-minute settlement concept in line with the provisions of the RSES."*

It is submitted that the proposed development will provide for 408 no. residential units which will assist and further support South Dublin in achieving the aforementioned population and housing targets.

Clondalkin is a secondary administrative centre for South Dublin County Council and identified as a '*Level 3 Retail Centre'* within the Retail Strategy in the Regional Spatial and Economic Strategy. The Clondalkin town centre includes shopping facilities, civic and administrative services and associated commercial, cultural and community facilities. The area around the centre is characterised by low density suburban neighbourhoods based around a network of local retail centres.

Policy CS6: The Settlement Strategy of the Development Plan states that it is the policy of the Council to *"Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy".* The policy objectives include:

> *"**CS6 Objective 2:** To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).*
>
> ***CS6 Objective 3:** To promote compact growth and to support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes to be located within or contiguous to the CSO defined settlement boundaries (consistent with NPO 3b and RPO 3.2).*
>
> ***CS6 Objective 4:** To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and / or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.*
>
> ***CS6 Objective 5:** To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally accessible street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and to existing developments which need them."*

The site in question is located adjacent to Clondalkin/Fonthill train station, in close proximity of the LUAS red line and is serviced by a high-frequency bus network with a proposed Bus Connects route, thus the proposed development is situated at an appropriate location to provide for a high-density residential development and ensures that development of these lands is consistent with development plan policy. The provision of 408 new housing units will assist in meeting the requirements of the Core Strategy. It is submitted that the proposed development at Ninth Lock Road, Clondalkin is consistent with the housing strategy as it will assist in the delivery of housing, of a sustainable density, within the city, whilst providing a variety of unit types and mixed tenures for all, in a high quality, vibrant community setting.

9.1.3 Natural, Cultural and Built Heritage

Chapter 3 of the Development Plan focuses on Natural, Cultural and Built Heritage within the County and sets out the following vision:

> "*Protect and enhance the key natural, cultural and built heritage assets which have shaped South Dublin County and continue to create a sense of place and local distinctiveness, including our diverse landscapes, our varied flora and fauna, our historic buildings and streetscapes, and our rich archaeological history, for current and future generations to appreciate and enjoy."*

The Plan states that there is a challenge in conserving Natural, Cultural and Built Heritage, in a sustainable manner so that we can protect our heritage *"assets while promoting a quality of life and a sense of identity and pride in a vibrant, thriving County."* The overarching Policy of the County is to "*Protect, conserve and enhance the County's natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations."* In this regard, the Plan sets out the following relevant policies and objectives:

> ***NCBH1 Objective 1:*** *To protect, conserve and enhance natural, cultural and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and development.*
>
> ***NCBH1 Objective 2:*** *To support the objectives and actions of the County Heritage Plan and the County Biodiversity Action Plan in the promotion and protection of natural, built and cultural heritage, and to take full cognisance of the County's Landscape Character Assessment and the County Geological Audit in the sustainable management of development.*
>
> ***Policy NCBH2: Biodiversity*** *- Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.*
>
> ***Policy NCBH3: Natura 2000 Sites -*** *Conserve and protect Natura 2000 sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.*
>
> ***NCBH3 Objective 1:*** *To prevent development and activities that would adversely affect the integrity of any Natura 2000 site located within or adjacent to the County and promote the favourable conservation status of the habitats and species integral to these sites.*

> ***Policy NCBH4: Proposed Natural Heritage Areas*** *- Protect the ecological, visual, recreational, environmental and amenity value of the County's proposed Natural Heritage Areas and associated habitats and species.*
>
> ***Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas*** *- Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.*
>
> ***NCBH5 Objective 2:*** *To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.*

All of the policies and objectives outlined above have been thoroughly considered and addressed within this application. The applicant has engaged qualified professional consultants to assess any potential environmental impacts associated with the proposed development, both on the site itself and within the surrounding area. The Council is therefore invited to review the comprehensive suite of environmental reports and assessments submitted in support of this application, including, Bat Survey, Ecological Impact Assessment and AA Screening Report, Wind Impact Assessment, Aeronautical Assessment, Arborist Report, Traffic and Transport Assessment, Climate & Sustainability Report and Landscape Plans.

The AA Screening concluded that in relation to Natura 2000 sites there would be no significant effect predicted from the proposed development. Having taken into consideration foul and surface water drainage from the proposed development, the scale of the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, it is concluded that the proposed development would not give rise to any significant effects to designated sites.

The EcIA Report completed on the site outlines that there are direct negative impacts upon the existing built ground and vegetation within the site are not regarded as being significant due to the absence of species of conservation importance and, as a result do not, require mitigation. However, mitigation measures should be put in place to ensure that bats, birds, and mammals are not impacted during construction. The Council is invited to refer to Table 4 within the EcIA, prepared by Altemar for further detail on the mitigation measures proposed.

9.1.4 Green Infrastructure

Chapter 4 of the Development Plan focuses on Green Infrastructure within the County and sets out the following vision:

> "*Promote the development on an integrated GI network for South Dublin County working with and enhancing existing biodiversity and natural heritage, improving our resilience to climate change and enabling the role of GI in delivering sustainable communities to provide environmental, economic, and social benefits."*

The Plan states that the provision of good Green Infrastructure from a placemaking perspective is an "*asset that can raise the profile of the County… and encourage people to live and work in the County.*" The overarching Policy of the County is to "*Protect, enhance, and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing, and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.*" In this regard, the Plan sets out the following relevant objectives:

> ***GI1 Objective 3:*** *To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural, and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites.*
>
> ***GI1 Objective 4:*** *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks.*
>
> ***GI2 Objective 1:*** *To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.*
>
> ***GI2 Objective 2:*** *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.*

As part of this application, Austen Landscape Architects have prepared various landscaping drawings which outlines how the proposed development is compliant with the Green Infrastructure policies. Given the existing hardstanding of warehousing on the site, the proposed development will have a significant Green Infrastructure net gain. The proposed development includes multiple green infrastructure elements in the proposal, including various tree planting, landscape boundary treatment, and green / blue roof proposal, which will all aid in the preservation and strengthening of biodiversity within the site. South Dublin County Council are invited to refer to the Landscape Masterplan prepared by Austen Landscape Architects for further details on how the existing trees and biodiversity of the site will be retained and protected.

As per Sustainable Water Management and Sustainable Drainage System policies of the Development Plan:

Policy GI3: Sustainable Water Management - *Protect and enhance the natural, historical, amenity and biodiversity value of the County's watercourses. Require the long-term management and protection of these watercourses as significant elements of the County's and Region's Green Infrastructure Network and liaise with relevant Prescribed Bodies where appropriate. Accommodate flood waters as far as possible during extreme flooding events and enhance biodiversity and amenity through the designation of riparian corridors and the application of appropriate restrictions to development within these corridors.*

Policy GI4: Sustainable Drainage Systems - *Require the provision of Sustainable Drainage Systems (SuDS in the County and maximise the amenity and biodiversity value of these systems.*

As part of the development, it is proposed to provide a new connection to the water main pipe which runs along Ninth Lock Road. In terms of proposed foul water layout the development proposes to connect to the public foul sewer which passes across the top left of the site. For further information, the Council is invited to refer to the submitted Engineering Report and drawings as part of this planning application.

Furthermore, the development proposes to incorporate SuDS measures into the subject development such as, green / blue roofs where feasible (on flat roof areas), blue roof system to the basement podium at ground floor level, infiltration trenches within the public realm areas to the south and east of the building, tree pits and raingarden areas to the public realm areas, and permeable surface paving and subsurface attenuation layer. Full details on the proposed SuDS measures within the site can be found within the enclosed engineering and landscaping packs submitted under separate cover of the application.

With regard to the relationship of Climate Resilience, Green Infrastructure, human health and wellbeing, it is a policy of the council to '*Improve the accessibility and recreational amenity of the County's GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.'* As such, the Plan sets out the following policies and objectives:

Policy GI5: Climate Resilience - *Strengthen the County's GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate.*

Policy GI6: Human Health and Wellbeing - *Improve the accessibility and recreational amenity of the County's GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.*

GI6 Objective 3: *To provide accessible, attractive, and safe routes linking settlements to the GI network of the County.*

GI6 Objective 5: *To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.*

GI6 Objective 6: *To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.*

> ***Policy GI7: Landscape, Natural, Cultural and Built*** *- Heritage Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the objectives and actions of the County Heritage Plan.*

Within the adopted County Development Plan, South Dublin County Council have introduced a **Green Space Factor (GSF)** which must be implemented in all new developments. As stated within the Plan "*The GSF is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area."* The implementation of the GSF seeks to ensure new development meets minimum standards and secure a '*positive contribution to biodiversity, amenity, air quality, stormwater management, temperature regulation, and other ecosystem services.'*

Austen Landscape Architects have completed the Green Space Factor Worksheet, outlining all Green Infrastructure proposed within the site. The subject development will have a significant Green Infrastructure and biodiversity net gain, given the current hardstanding with warehousing covering majority of the site. The proposed development includes multiple green infrastructure elements in the proposal, including various tree planting, landscape boundary treatment, and blue and green roof proposals. The Green Space Factor achieved for this development is 0.54, which exceeds the required score of 0.5. South Dublin County Council are invited to refer to the relevant engineering and landscaping drawings and reports submitted under separate cover for further details.

9.1.5 Quality Design and Healthy Placemaking

The vision of Chapter 5 of the Development Plan is to "*Create a leading example in sustainable urban design and healthy placemaking that delivers attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in."* The Development Plan further states that South Dublin County seeks to "*Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities."* In this regard, the Plan sets out the following relevant policies and objectives:

> ***Policy QDP1: Successful and Sustainable Neighbourhoods -*** *Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities.*
>
> ***QDP1 Objective 1:*** *To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009).*
>
> ***QDP1 Objective 2:*** *To ensure that residential, mixed use and employment development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated).*
>
> ***QDP1 Objective 3:*** *To protect the quality, ambiance, vibrancy and vitality of urban centres by promoting an appropriate mix of complementary and compatible day and night-time uses, including commercial, recreational, civic, cultural, leisure and residential uses.*

QDP1 Objective 4: *To reinforce the network of urban centres as the appropriate locations for new mixed-use development, ensuring that the existing context including identified built and natural assets, urban design, integration and potential for connectivity fully informs development.*

QDP1 Objective 5: *To promote the re-development of underutilised Local Centres within the County as new mixed use neighbourhood hubs continuing to provide for local retail and services in a manner which respects and consolidates the existing urban character of these areas ensuring adherence to the eight key design principles in 'The Plan Approach' including quality of design, integration, accessibility, and connections to the surrounding areas.*

QDP1 Objective 6: *To build residential neighbourhoods in a manner that aims to provide for adequate numbers of affordable homes in line with provisions set out in Goal 11 of the UN Sustainable Development Goals, the National Planning Framework and the Regional Spatial and Economic Strategy towards the delivery of long-term sustainable communities.*

The proposed development has been designed fully in accordance with the *'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas'* and provides an array of facilities to support the new community and provide for the existing community. The application proposes to redevelop an underutilised site which is zoned residential and town centre with a new mixed-use neighbourhood which will provide for a new development in which will provide safe and secure homes and communities. It is submitted that the proposed development will comply with the 'Urban Design Manual; A Best Practice Guide' (2009), and the 'Design Manual for Urban Roads and Streets' (2013).

In terms of providing a development through 'The Plan Approach', South Dublin County Council has provided guidance in terms of *"eight principles so that every opportunity is harnessed to drive and support the vision for South Dublin County to create attractive, connected and functional places to live, work, visit, socialise and invest in."* In this regard, the Plan sets out the following relevant policies and objectives:

Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods - *Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.*

QDP2 Objective 1: *To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.*

The Council is invited to refer to the Architectural Reports prepared by O' Mahony Pike Architects which assesses the proposed development against these eight principles set out in 'The Plan Approach'.

With regards to Neighbourhood context, the Plan seeks to *"Support and facilitate proposals which contribute in a positive manner to the character and setting of an area."* It is aimed to achieve this by setting out the following Objectives:

> ***QDP3 Objective 1:*** *To ensure new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 12: Implementation and Monitoring in relation to design statements.*
>
> ***QDP3 Objective 3:*** *To promote and adhere to design standards and densities in village centres that are informed by the surrounding village and historic context and enhance the specific characteristics of each town or village in terms of design, scale, form and external finishes.*
>
> ***QDP3 Objective 6:*** *To ensure that higher buildings in established areas respect the surrounding context and take account of heights and their impact on light and the negative impact that they may have on existing communities to ensure consistency with regard to Healthy Placemaking.*

The proposed development seeks to respond in a positive manner to the existing character and setting of the immediate area.

It is submitted that the proposed development, including its layout and connections to adjoining lands, afford future residents' proximate access to services and facilities in the area and promote sustainable modes of transport, primarily pedestrian and cyclist connections through the site to adjoining lands. Thus, the proposed development assists South Dublin County Council in achieving its '10 minute settlements', which promotes a '*more compact development form, sustainable movement, and ease of access to services, community facilities, jobs, and amenities'*.

With regards to public realm, the Plan looks to "*promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County."* It is respectfully submitted that the proposed development will contribute positively to the creation of new, and the enhancement of the existing public realm which currently comprises primarily hardstanding at the subject site. It is proposed that the public realm within the development will enable the community to enjoy a healthy living environment within the site, while also enhancing the adjoining, existing public realm within the area. South Dublin County Council are invited to refer to the landscaping and architectural drawings submitted under separate cover, for further details on the proposed public realm as part of the application.

In regard to Healthy Placemaking and Connected Neighbourhoods, the following policies and objectives apply:

> ***Policy QDP4: Healthy Placemaking*** *- Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.*
>
> ***Policy QDP5: Connected Neighbourhoods -*** *Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a*

more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.

The proposed development places significant focus on the public realm and on the placemaking role of the development to ensure it integrates appropriately with the surrounding areas. The development will provide a significant public benefit to the area through the creation of a pedestrian and cycle link through the site. This will increase the level of permeability throughout the area of Clondalkin as well as ensure that South Dublin County Council's objectives for the site are fulfilled.

The subject site is also located in a central location which has various community and social services facilitating the development. The Council is invited to refer to the Community and Social Infrastructure Audit which provides extensive data in this regard. The development is also providing a 350sq. m. creche to ensure there is a sufficient space for the predicted amount of children in the scheme and surrounding area.

Policy QDP7: High Quality Design – *Development General Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.*

QDP7 Objective 7: *To ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces, taking into consideration the proportions and activities of buildings on both sides of a street or surrounding a public space, providing for good standards of daylight and sunlight, and micro climatic conditions and having regard to the guidance and principles set out in the South Dublin County's Building Height and Density Guide and the Design Manual for Urban Streets and Roads (DMURS) (2019).*

The Architectural Drawings and Design Statement prepared by O' Mahony Pike Architects, gives a complete, comprehensive, overview of how the proposed development is compliant with all necessary national, regional, and local guidelines in terms of development, building height, design, density, and mix of dwellings. South Dublin County Council are invited to refer to the architectural pack, submitted under separate cover for further details in relation to the objectives listed above.

Policy QDP8: High Quality Design – *Building Height and Density Guide (BHDG) Adhere to the requirements set out in the Urban Development and Building Height Guidelines (2018) issued by the DHLGH through the implementation of the Assessment Toolkit set out in the South Dublin County's Building Heights and Density Guide 2021.*

Policy QDP9: High Quality Design - *Building Height and Density Apply a context driven approach to building heights in South Dublin, as supported by South Dublin's Building Heights and Density Guide.*

The Council is invited to refer to Section 7.7 of this Planning Report and Statement of Consistency which has comprehensively assessed the proposed height of the development in relation to the surrounding area. Further detail is also provided within the architectural report and drawings submitted under separate cover as part of the final planning application.

In relation to the materiality of the proposed development, the following policy is of relevance:

> ***Policy QDP11:*** *Materials, Colours and Textures Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency.*

Following the 32B Pre-Planning Meeting, the design team have taken the Council's comments into consideration and are now providing an alternative materiality of the proposed buildings to ensure their alignment to the existing architecture and materiality of the surrounding Clondalkin context. Further detail can be seen in O' Mahony Pike's reports and drawings.

9.1.6 Housing

Chapter 6 of the Development Plan focuses on Housing in the County and sets out the following vision:

> *"Ensure the delivery of high quality and well-designed homes in sustainable communities to meet a diversity of housing needs within the County."*

The key focus of this chapter is setting out suitable policies and objectives to assist the County in achieving its housing need and reaching the Housing Need and Demand Assessment results. Such examples of relevant objectives are as follows:

> ***Policy H1: Housing Strategy and Interim Housing Need and Demand Assessment -*** *Implement South Dublin County Council Housing Strategy and Interim Housing Needs and Demand Assessment 2022-2028 (and any superseding Housing Strategy agreed by the Council) and to carry out a review of the Housing Strategy as part of the mandatory Two-Year Development Plan review*
>
> ***H1 Objective 2:*** *To require that 20% of lands zoned for residential use, or a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable Housing Act 2021 and the Planning and Development Act 2000 (as amended).*
>
> ***H1 Objective 7:*** *To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County's town boundaries suited to their strategic regional role, subject to good design and development management standards being met.*
>
> ***H1 Objective 13:*** *To support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020) and the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.*
>
> ***Policy H2: Supply of Housing*** *- Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.*

> ***H2 Objective 6:*** *To ensure an adequate and appropriate provision of social housing across the County, particularly in relation to 1 bed and 4 bed units, through the building up of public landbanks, facilitation of the transfer of lands and other appropriate mechanisms with third parties (only where necessary) to ensure an appropriate number of and distribution of new social housing, and to avoid additional concentration of social housing above that already in existence.*

It is proposed, as part of this application, to provide 20% of the units (mostly 1 bed and 2 bed units) as social and affordable housing subject to a Part V agreement with South Dublin County Council. The proposed development inherently complies with the overarching themes of the NPF by proposing a compact, well designed sustainable form of residential development on an underutilised site located in close proximity to a range of social and commercial facilities and public transport services. The development therefore accords with the NPF's aims to consolidate Dublin through the development of underutilised sites. The scale and location of the subject site, therefore, provides an opportunity for a sustainable, higher density, residential development. As well as the delivery of much-needed housing. It is also noted that the proposed housing development is designed in an age and abilities friendly manner and the site is proximate to existing services and amenities including pedestrian footpaths, local shops, parks, and public transport. South Dublin County Council are invited to refer to the Architectural Drawings for further details in this regard.

With regards to design and layout Policy H7: Residential Design and Layout of the County Development Plan seeks to *"Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development."* It is aimed to achieve high quality developments through incorporating *"energy efficiency measures and promote innovation in renewable energy opportunities"* and supporting the "*principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling."* The Council are invited to refer to the Architectural Design Statement, prepared by O' Mahony Pike Architects, which demonstrates how the proposed layout and design, conforms with the best practice, as required under the Development Plan, as well as the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020).

With regards to Public Open Space, the Development Plan seeks to "*Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area."* In this context, the Plan sets out the following Objectives:

> ***H8 Objective 1:*** *To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Open Space and Chapter 12: Implementation and Monitoring.*
>
> ***H8 Objective 3:*** *To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments or where appropriate provide for the upgrade of other parks in the immediate area (applying the 10-minute concept) through a*

financial contribution in lieu, where a proposed development is not capable of providing the full open space standards on site.

The proposed development includes a significant public open space provision and aligns with the minimum public open space standard for residential development. It is also noted that the site benefits from generous public open space and high-quality public realm provided within easy walking distance of the site as illustrated within the Community and Social Infrastructure Audit carried out by DOWNEY. It is therefore respectfully considered that sufficient public open space is provided. In relation to private and communal open space, the Plan looks to "*ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments."* The Plan sets out the following objective:

H9 Objective 2: *To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.*

Within the proposed development, all apartments will have access to their own high quality private balconies or terraces and further communal open spaces provided within the development, all in accordance with the national requirements. South Dublin County Council are invited to refer to the Architectural drawings, prepared by O' Mahony Pike Architects, for further details on how the private and public open spaces provided are compliant with the relevant requirements.

As previously mentioned in Section 1.6 above, the proposed development follows the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025), in relation to the internal layouts of the apartments and are therefore, compliant with ***Policy H10: Internal Residential Accommodation*** *- Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.*

Other relevant policies include:

Policy H11: Privacy and Security *- Promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.*

Policy H12: Steep or Varying Topography Sites *- Ensure that development on lands with a steep and / or varying topography is designed and sited to minimise impacts on the natural slope of the site.*

The proposed development has been designed to comply with the relevant National "Technical Guidance Document M - Access and Use". For further information, the Council is invited to refer to the attached Engineering and Landscaping Packs which display appropriate levels across the site. In relation to privacy the development also provides adequate separation distances and orientation of the buildings to ensure there is no adverse overlooking or overshadowing on surrounding existing developments as well as the proposed development itself.

Within Section 6.8 of the Plan, it is stated that the Development Plan looks to "*Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing*

viability of social and physical infrastructure and services and meet the future housing needs of the County." The following objectives have been set out within the Plan:

> ***H13 Objective 1:*** *To promote and support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.*
>
> ***H13 Objective 2****: To maintain and consolidate the County's existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 12: Implementation and Monitoring.*
>
> ***H13 Objective 4:*** *To promote and encourage 'Living-Over-The-Shop' residential uses on the upper floors of appropriate buildings located in Town, District, Local and Village Centres within the County save for public houses and nightclubs and other inappropriate places where similar business is conducted.*

The application will seek to develop a site with a mixed use, primarily residential development, measuring c. 2.2 hectares (net) in an established area which will benefit from the existing infrastructure and services in the area. The proposed development provides for an appropriate residential density and has been designed to provide a good level of residential amenity for future residents of the scheme, while also preserving the existing residential amenity of adjoining residents. It is respectfully submitted therefore that the proposed development complies with all relevant policies and objectives of the County Development Plan in relation to housing.

9.1.7 Sustainable Movement

As emphasised in the Development Plan, one of the major challenges facing South Dublin County Council is the need to promote and provide for sustainable transport options, whilst maintaining the effectiveness of the County's Road network. This is also a challenge present within Clondalkin town centre; however, the subject lands are well served by public transport—namely the Clondalkin/Fonthill train station, LUAS, and a high frequency bus network (the proposed Bus Connects route is also due in the near future). Please refer to the Traffic Impact Assessment and Mobility Management Plan prepared by GK Consulting Engineers which are included as part of this LRD application for further details on the inclusion of this significant public transport proposal to the overall scheme pertaining to the subject lands.

In relation to transport and mobility, the Development Plan states that in order to support sustainable future development the Council will seek to positively and constructively promote, encourage and facilitate a shift towards sustainable means of transport. Some of the policies and objectives in this regard include:

> ***Policy SM1:*** *Overarching – Transport and Movement Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.*
>
> ***SM1 Objective 4:*** *To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active*

modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES / MASP.

***Policy SM2: Walking and Cycling** - Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets.*

***Policy SM3: Public Transport –** General Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.*

***Policy SM5: Street and Road Design** - Ensure that streets and roads within the County are designed to balance the needs of all road users and promote placemaking, sustainable movement and road safety providing a street environment that prioritises active travel and public transport.*

***Policy SM6: Traffic and Transport Management**: Effectively manage and minimise the impacts of traffic within the County having regard to the need to provide shared road space for different users.*

***Policy SM7: Car Parking and EV Charging** - Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities.*

The proposed development has prioritised pedestrian and cycle movements as an integral part of the overall design and master planning of the subject lands and forms part of a street network which allows for further linking between the village core and surrounding areas. The development will provide for a cycle and pedestrian route through the site which will also link directly to Ninth Lock Road via Oakfield Road. This will ensure the harmonious integration of the proposed development into the surrounding community as well as providing a direct link from Riversdale Estate to the proposed "Ninth Lock Road" cycle route which is outlined in Table 7.1 of the South Dublin Development Plan.

It is submitted that the proposed development at Clondalkin is consistent with the transport and mobility policies and objectives. The proposed development will ensure walking and cycling are viable options for the community, with the area also very well served by existing public transport infrastructure, all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport.

9.1.8 Community Infrastructure and Open Space

The development plan sets out the following vision for community infrastructure and open space:

> "*The creation of healthy, inclusive, and sustainable communities where all generations have local access to social, community, and recreational facilities, and parks and green spaces, to suit their needs.*"

It is stated that the creation of sustainable, healthy, and socially inclusive neighbourhoods '*is one of the cross-cutting themes of the County Development Plan.'* The Plan notes that provision of appropriate social infrastructure across the County will be a priority to ensure good, sustainable neighbourhoods are provided for both existing and future residents.

With regards to Open Space, the Plan sets out the following policy and objectives:

> ***Policy COS5 Parks and Public Open Space – Overarching:*** *Provide a well-connected, inclusive and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit the County.*
>
> ***COS5 Objective 1:*** *To support a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard of 2.4ha. per 1,000 populations.*
>
> ***COS5 Objective 19:*** *To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of different age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and participate in play, and to ensure play spaces and play facilities comply with universal design principles.*
>
> ***Table 8.2 Public Open Space Standards (SDCC Development Plan 2022-2028):***

New Residential Development on lands in Other Zones including mixed-use	Minimum 10% of site area.

The proposed development includes a high quality, public open space, provided at the heart of the scheme. This civic space will adjoin the proposed pedestrian and cycle link along its east-westerly edges and is also envisaged as a landscape park. Secondary open space is provided throughout this proposal also. In total, 0.35 hectares of public open space (16% of the net site area) is being provided, which exceeds the minimum requirement of Objective COS5 Objective 1. The Planning Authority are invited to refer to the Statement of Response by DOWNEY for further details.

Regarding private communal and private amenity spaces for residents, each residential block provides a communal open space within the centre of the blocks. A total of 3100 sq.m. of communal open space is being provided. This exceeds the area of 1979sq.m. that would be required under the Development Plan by 56.8%.

Full details on the proposed play spaces can be found in the landscaping masterplan prepared by Austen Landscape Architects and submitted under separate cover.

With regards to Community and Social Infrastructure, the following objectives and policies are of relevance:

> ***Policy COS1: Social Inclusion and Community Development*** *- Promote social inclusion and community development and encourage active participation and social integration of minority and marginalised groups, consistent with RPO 9.1 and RPO 9.2 of the RSES.*
>
> ***Policy COS2: Social / Community Infrastructure*** *- Support the planned provision of a range of universally accessible and well-connected social, community, cultural and recreational facilities, close to the communities they serve, consistent with RPO 9.14 of the RSES. (See also Chapter 5: Quality Design and Healthy Placemaking).*
>
> ***COS2 Objective 1:*** *To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for a period of review to adapt to the needs of an increasingly multi-cultural and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes.*
>
> ***COS7 Objective 2:*** *To require a provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the 'Childcare facilities Guidelines for Planning authorities (2001)', or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variations to this standard being justified having regard to factors such as type of residential units, emerging demographic, and availability of existing childcare services in the vicinity.*

A creche is proposed as part of this development which will serve for the predicted number of children who will reside in this development. South Dublin County Council is invited to refer to the Childcare Demand Assessment contained within the Social Infrastructure Audit conducted by DOWNEY and submitted as part of this subject LRD planning application. The submitted Community and Social Infrastructure Audit also provide details in regard to the existing services in the area.

9.3.9 Energy

Chapter 10 of the development plan sets out the following vision for energy:

> *"Deliver a green society and circular economy adaptable to new technologies, a home and place of employment for people and industries striving towards reducing their carbon footprint."*

Some relevant planning policy and objectives include:

> ***Policy E1: Responding to European, National and Regional Policy and Legislation -*** *Respond to the European, National and Regional Climate Action Programme and UN Sustainable Goal 13 through the integration of climate action policies and objectives which promote renewable energy and energy conservation and an increase in energy efficiency; à Promote an increase in energy efficiency and the growth of locally based energy alternatives in an environmentally acceptable and sustainable manner.*

Policy E2: South Dublin Energy Profile - *Further develop and implement climate action and energy related initiatives in the County in conjunction with EMRA, the Dublin Energy Agency (Codema), Climate Action Regional Office (CARO) and all relevant stakeholders, promoting energy efficiency and renewable energy measures across the County.*

Policy E4: Electric Vehicles - *Promote the delivery of EV charging facilities in accordance with relevant regulations and national and regional policy and guidance. (see also Chapter 7: Sustainable Movement and Chapter 12: Implementation and Monitoring).*

E4 Objective 1: *To support the implementation of the EV charging strategy for the Dublin Region.*

Policy E5: Low Carbon District Heating Networks -

1. *Support the delivery of low carbon district heating networks at appropriate locations across the County and subject to proven feasibility. Support also complementary technologies such as combined cooling, heat and power (CCHP), large scale heat pumps, and renewable energy opportunities, including geothermal energy, energy from waste, biomass and bio-gas;*

2. *Support the investigation of both deep and shallow geothermal energy sources throughout the County. Deep geothermal projects are particularly suited to areas demonstrating high heat densities;*

3. *Support the delivery of District Heating Proposals subject to proven feasibility within areas demonstrating heat demand density in excess of 150TJ / km2 (including for the identified areas of Low Carbon District Heating Potential in Tallaght, Clonburris / Grange Castle and Clondalkin). Future developments within these areas should connect into existing or confirmed District Heating Systems. Where a District Heating scheme has not been confirmed new development should be designed so that it can connect into such a scheme when one is delivered;*

4. *Support for low carbon district heating networks is subject to the appropriate environmental assessments being undertaken to ensure no significant impact on the wider environment including human health.*

Policy E7: Solar Energy - *Promote the development of solar energy infrastructure in the County, including the building of integrated and commercial-scale solar projects subject to a viability assessment and environmental safeguards including the protection of natural or built heritage features, biodiversity and views and prospects.*

Policy E12: Decarbonising Zones - *Support the identification and development of decarbonisation zones in South Dublin over the lifetime of the Development Plan.*

In relation to the Energy, sustainability and addressing the decarbonization zone that the development is located in, the applicant has engaged the services of Lawler's Consulting Engineers which have worked on the proposed development to provide a detailed response and significant input into the design and completion of the residential development. This has been included in the application in order to comply with the South Dublin Climate Action Plan 2024-2029 and National Climate Action

Policies, the development has been designed to provide for high quality A-rated homes, flood resilience, high performance building fabric, and low-carbon homes supported within the Building Lifecycle Report. The Council is invited to refer to the Climate & Sustainability Report and Energy & Climate Action Report, by Lawlor Consulting, which is submitted as part of the final planning application and sets out how the proposed development is fully consistent with these objectives and policies.

9.1.10 Development Management Standards

Chapter 12 (Implementation and Monitoring) of the South Dublin County Development Plan 2022-2028 sets out the development standards and criteria that arise out of the policies and objectives of the County Development Plan, to ensure that development occurs in an orderly and efficient manner and that is in accordance with proper planning and sustainable development.

Connectivity and Movement

As emphasised in the Development Plan, one of the major challenges facing South Dublin County Council is the need to promote and provide for sustainable transport options, whilst maintaining the effectiveness of the County's Road network. This is also a challenge present within Clondalkin town centre; however, the subject lands are well served by public transport—namely the Clondalkin/Fonthill train station, LUAS, and a high-frequency bus network (the proposed Bus Connects route is also due in the near future).

In relation to transport and mobility, the Development Plan states that in order to support sustainable future development the Council will seek to positively and constructively promote, encourage and facilitate a shift towards sustainable means of transport. This is supported within the design of the proposed development through the high provision of bicycle storage and through the reduced provision of car parking spaces.

Density and Building Height

The design proposal has taken cognisance of the new *'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities'*, which encourage residential densities in the range 50 dph to 250 dph (net) generally being applied in urban neighbourhood zones of Dublin and Cork. It is submitted to the Local Authority that the subject site is located within an urban neighbourhood zone by virtue of its town centre setting, and proximity to existing high-capacity public transport nodes.

The proposed residential scheme, which will provide for a total of 408 no. residential units, complies with the aforementioned requirements of the guidelines proposing a density of 185 dph (net).

Due regard has also been given to the proposed height of 2-9 storeys within the development which is deemed acceptable given the zoning of the site and the surrounding context of the site.

Dual Aspect

The Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025), state the following in terms of dual aspect:

(i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.

(ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

The proposed development provides for 44% of the units to be dual aspect which comfortably exceeding the minimum requirements within the new guidelines.

Room Sizes and Mix of Units

The minimum apartment sizes and mix of unit types permitted within the Development Plan are in accordance with SPPR 1 of the 'Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025)', which state the following:

(i) "With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(ii) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above."

The proposed development fully complies with SPPR 1 of the Planning Design Standards for Apartments Guidelines for Planning Authorities, (2025).

Car Parking

The proposed development is located within a Zone 1 area and therefore the following car parking standards apply, as per Table 12.25 and 12.26 of the Development Plan:

- 1 no. parking space per 1-bedrom apartment; 1.25 no parking space per 2-bedroom apartment; 1.5 no. car parking space per 3-bedroom apartment.
- 1 no. parking space per creche classroom.

The proposal provision of 202 no. parking spaces for the 408 no. proposed residential units is considered appropriate. DOWNEY submit that it is important to note that the location of the proposed development within close proximity to numerous existing public transport options, such as the Clondalkin Fonthill DART station and multiple Dublin Buses servicing the location, allows for car parking provision standards to be minimised, substantially reduced or eliminated. Therefore, it is considered that the proposed development is consistent with the aforementioned standards set out within the South Dublin Development Plan as well as the vision of the Local Authority to reduce car dependency.

Bicycle Parking

The importance of adequate provision of bicycle parking for new development is emphasised throughout the South Dublin County Development Plan 2022-2028 with Table 12.23 outlining minimum bicycle parking standards for developments. The following figure is an extract taken from Table 12.23 of the Development Plan.

The proposed development will provide for 752 no. bicycle parking spaces. This level of provision ensures ample secure and convenient cycling infrastructure to support active travel, consistent with Development Plan objectives to promote cycling as a viable and safe transport mode.

Public Open Space

The following figure displays an extract from Table 12.22 of the Development Plan, which sets out the requirements for public open space in the County.

Table 12.22: Minimum Public Open Space Standards

Land Use	Public Open Space Standards (Minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area

Table 5: Minimum Public Open Space Standards.

There is 3468 sqm of public open space being provided within the proposed development.

In terms of private open space, it will be provided in the form of balconies. Communal open space will consist of approximately 3100 sqm for the proposed development.

Childcare

The following objective within the South Dublin Development Plan states:

"***COS7 Objective 2:*** *To require a provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the 'Childcare facilities Guidelines for Planning authorities (2001)', or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variations to this standard being justified having regard to factors such as type of residential units, emerging demographic, and availability of existing childcare services in the vicinity."*

The proposed development will provide 1 no. purpose-built childcare facility, extending to c. 350 sq. m., within the scheme. South Dublin County Council are also invited to refer to the Community and Social Infrastructure Audit prepared by DOWNEY.

Surface and Wastewater Treatment

In terms of Drainage, Foul Water, Surface Water and overall SUDS issues, the Planning Authority are invited to refer to the Engineering Report prepared by GK Consulting Engineers.

Development Management Standards

Objective	Compliance
12.3 Natural, Cultural, and Built Heritage	
12.3.1 Appropriate Assessment	An Appropriate Assessment Screening report has been carried out by Altemar Ecological Consultants and is submitted under separate cover as part of the final application.
12.3.2 Ecological Protection	Ecological surveys, including habitat surveys and an Invasive Species Survey as well as a Bat Survey have been carried out by Altemar and are submitted with this LRD application. No protected species or fauna are found on the site.
12.3.3 Environmental Impact Assessment	The proposed development is beneath the required threshold of providing an Environmental Impact Assessment.
12.4 Green Infrastructure	
12.4.2 Green Infrastructure and Development Management	Austen Landscape Architects have prepared Landscape a Landscape Masterplan, Landscape design rationale and Green Infrastructure Plan. South Dublin County Council are invited to refer to the Landscape drawings submitted under separate cover for further details on the proposed landscaping and green infrastructure within the site.
12.5 Quality Design and Healthy Placemaking	
12.5.1 Universal Design	O' Mahony Pike Architects have prepared a detailed Architectural Design Statement. The Design statement outlines how the proposed development is in compliance with the 12 Urban Design Criteria, including Context; Connections; Inclusivity; Variety; Efficiency; Distinctiveness; Layout; Public Realm; Adaptability; Privacy/Amenity; Parking and Detailed Design, of which Planning Authorities are recommended to assess planning applications. Further details of how the proposed development is in accordance with the Design Manual can be found in the Architectural Design Statement that has been prepared by O' Mahony Pike Architects, and which is submitted under separate cover as part of this planning application.

12.5.2 Design Considerations and Statement	In line with the requirements of the Development Plan, O' Mahony Pike Architects have prepared an Architectural Design Statement, which details how the 'plan approach' has been taken into consideration and incorporated into the design of the proposed development.
15.2.3 Density and Building Height.	The proposed developments overall net density approximately 185 units per hectare, which is in accordance with National Policy and Section 28 Guidelines and is deemed appropriate given the need to encourage medium to high density residential development on zoned and serviced lands, in close proximity to good quality public transport which also have the benefit of being adjacent to high quality pedestrian and cyclist infrastructure and connections between active and passive recreational areas. The proposed overall net density of this development is appropriate considering the subject site is considered to be located within a City-Urban Neighbourhood Zone as per the new Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities It is stated within the Guidelines that it is a policy and objective that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin. Due regard has also been given to the proposed height of 2-9 storeys within the development which is deemed acceptable given the zoning of the site and the unique surrounding context. The proposals heights are guided in significant part by the South Dublin County's Building Height and Density Guide in order to promote high quality design and compliance with best practise guidance.
12.5.4 Public Realm: (At the Site Level)	The Council are invited to refer to the landscape drawings and reports prepared by Austen Landscape Architects as part of this planning application for further detail.
12.5.5 Healthy Placemaking and Public Realm (At the Neighbourhood Level)	The Plan sets out the following key principles for Healthy Placemaking and Public Realm: • Identity and Sense of Place • Moving Around • Safe, Inviting, and Inclusive • Gateway Features and Signage. It is proposed that the public realm within the development will enable the community to enjoy a healthy living environment within

	the site, while also enhancing the adjoining, existing public realm within the area. South Dublin County Council are invited to refer to the landscaping and architectural drawings submitted under separate cover, for further details on the proposed public realm as part of the application.
12.6 Housing	
12.6.1 Mix of Dwelling Types & 12.6.3 Unit Tenure	The proposed development provides for a total of 408 no. dwellings and offers a variety of unit mix in terms of size and type, within studios, 1, 2, and 3-bedroom units. The proposed unit mix is as follows: • 24 (6%) no. studios • 230 (56% no. 1 bedroom units • 149 (37%) no. 2 bedroom units • 5 (1%) no. 3 bedroom units. Whilst there are different apartment unit types provided in terms of bedroom provision, it is also important to note that within these categories of units, there is a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. There are also own door houses and own-door apartments being proposed. This ensures that the proposed development provides for the various needs of future residents and that it is a sustainable form of residential development which can cater for all age demographics, is adaptable and flexible for their future needs, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc.
12.6.7 Residential Standards	<u>Apartments</u> All apartments will accord with or exceed the communal open space and floor area standards set out in Table 12.21 of the Plan (Figure 17 below). The design of schemes fully accords with the minimum standards outlined in the Apartment Guidelines in relation to design, internal facilities, aspect, lift/stair cores, communal facilities, refuge storage, bicycle parking and children's play and amenity spaces. Further details in this regard are provided within the Architectural Design Statement prepared by O' Mahony Pike Architects, and the other sections of this Planning Report and Statement of Consistency.

<table>
<tr><td>12.6.8 Residential Consolidation</td><td>The proposed development has had full regard to the Sustainable and Compact Settlement Guidelines. A full site analysis has been undertaken by O' Mahony Pike Architects which takes account of the local context, the surrounding built form, density, features, materials, and finishes.

Further details in this regard are provided within the Architectural Design Statement prepared by O' Mahony Pike Architects.</td></tr>
<tr><td>12.6.10 Public Open Space</td><td>Table 12.22 of the Plan (below) sets out the requirements for public open space in the County.

Table 12.22: Minimum Public Open Space Standards
<table><tr><th>Land Use</th><th>Public Open Space Standards (Minimum)</th></tr><tr><td>Overall Standard</td><td>2.4 Ha per 1,000 Population</td></tr><tr><td>New Residential Development on Lands Zone RES-N</td><td>Minimum 15% of site area</td></tr><tr><td>New Residential Development on Lands in Other Zones including mixed use</td><td>Minimum 10% of site area</td></tr><tr><td>Institutional Lands / 'Windfall' Sites</td><td>Minimum 20% of site area</td></tr></table>
As previously discussed, the proposed development includes a new public open space at the centre of the site is being proposed, which exceeds 10% of the site area. This space will also help to create permeability in a west-east direction through the site.</td></tr>
<tr><td colspan="2">12.7 Sustainable Movement</td></tr>
<tr><td>12.7.1 Bicycle Parking / Storage</td><td>The proposed application allows for a total of 752 bicycle parking spaces within the scheme which complies with the standards set out in the South Dublin Development Plan 2022-2028. All spaces are secure, covered and easily accessible to encourage residents and visitors to cycle to and from the development.

A TTA has been prepared by PMCE with further details on the bicycle parking provision.</td></tr>
<tr><td>12.7.2 Traffic and Transport Assessments and

12.7.3 Travel Plans</td><td>PMCE have prepared a Traffic Impact Assessment, which is submitted under separate cover.</td></tr>
<tr><td>12.7.4 Car Parking Standards</td><td>The proposed development is located within a Zone 1 area and therefore the following car parking standards apply, as per Table 12.25 and 12.26 of the Plan:

• 1 no. parking space per 1-bedrom apartment; 1.25 no parking space per 2-bedroom apartment; 1.5 no. car parking space per 3-bedroom apartment.
• 1 no. parking space per creche classroom.</td></tr>
</table>

	• 1 no. parking space per 15 sq. m. of café floor area. • 1 no. parking space per 50 sq. m. retail floor area. • 2 no. parking space per community facility A TTA has been prepared by PMCE with further details on the parking provision.
12.7.5 Car Parking / Charging for Electric Vehicles (EVs)	The proposed development allows for a total of 18 no. EV parking spaces, which complies with the minimum 20% of total parking spaces and standards set out within the Development Plan.
12.7.6 Car Parking Design and Layout	The proposed development benefits from the provision of both on-street parking (140 no. Spaces) and a podium car park (62 no. spaces). South Dublin County Council are also invited to refer to the Traffic Pack Prepared by PMCE for further details on car parking provision.
12.8 Community Infrastructure and Open Space	
12.8.4 Early Childhood Care and Educational Facilities	Any proposed childcare facilities should be provided in accordance with the Childcare Facilities: Guidelines for Planning Authorities (DEHLG). The proposed development will provide 1 no. purpose-built childcare within the scheme. South Dublin County Council are also invited to refer to the Community and Social Infrastructure Audit prepared by DOWNEY.
12.9 Economic Development and Employment	
12.9.5 Retail Development	Retail development is not proposed. However, the site is located in the centre of Clondalkin where there is a range of retail and commercial facilities, including the Mill Shopping Centre.
12.11 Infrastructure and Environmental Services	
12.10.1 Energy Performance in New Buildings	As the development proposal is a large-residential scheme an Energy Efficiency and Climate Change Adaptation Design Statement has been prepared by Lawler Sustainability and submitted as part of the M &E engineering pack alongside this application for the consideration of South Dublin County Council.
12.11.1 Water Management	As the proposed development is partially located within flood Zone B, the documents outlined below have been submitted as part of this application. <u>Flood Risk Assessment</u> Please refer to the Report by McCloy Consulting Engineers

	Surface Water Please refer to the Report by GK Consulting Engineers Sustainable Urban Drainage System (SuDS) Please refer to the Report by GK Consulting Engineers
12.11.3 Waste Management	With regards to waste management, please refer to the following documents prepared by AWNconsulting and submitted on behalf of this application: • Resource & Waste Management Plan • Operational Waste Management Plan • Construction Environmental Management Plan

Table 6: Development Management Standards.

9.2 Clondalkin Local Planning Framework

The lands are also subject to South Dublin Development Plan 2022-2028 Variation No. 1 which has been adopted and came into effect on 9th March 2026. The main vision of the Clondalkin Local Planning Framework is:

> *"That Clondalkin grows as a vibrant, sustainable community rooted in its unique history and heritage, where people of all ages and backgrounds can enjoy a rich mix of culture, social connections, and economic opportunities. With new green areas and easy-to-use transport options, everyday life will be improved, making it safer and more enjoyable for everyone as a place where people will love to live, work, visit, and invest in the future."*

This Planning Framework has been undertaken in the context of QDP14 Objective 3 and EDE4 Objective 14 of the County Development Plan 2022-2028 which state as follows:

"Prepare a LAP for Clondalkin, the extent of the boundary to be defined, which will be guided by the Local Area Plans Guidelines for Planning Authorities, 2013 (Department of the Environment, Community and Local Government) or any superseding guidelines and which will incorporate:

- *A vision for the development of Clondalkin.*
- *Wider urban design principles.*
- *Framework plans for larger infill sites.*
- *A Conservation Plan.*
- *A local Green Infrastructure strategy derived from the County GI Strategy;*
- *Local Transport Plan.*

A key component of the South Dublin County Development Plan 2022- 2028 and of the National Planning Framework (NPF) is to support the consolidation of built-up areas. The alignment of everyday services focused within urban centres will facilitate the 10-minute settlement concept in line with national policy by ensuring that homes and services are proximate to each other.

The proposed development seeks to provide a high-quality, mixed-use proposal which sustainably integrates with the existing character of the area, surrounding developments and achieves the objectives and strategies set out within this Clondalkin Local Planning Framework. The development provides high-quality development on a site which is appropriately zoned and within a well-connected area. The following section will provide a detailed response to the relevant policies and objectives of the Clondalkin Local Planning Framework.

3.2.2 Climate Action and Infrastructure

Chapter 3 of the Clondalkin Planning Framework sets out the main vision and strategic objectives for the Clondalkin. The Clondalkin LPF area has been selected as a Decarbonization Zone as the area is considered:

1. To be ready to support climate action,

2. To have a strong sense of community,

3. To be the right size in terms of population (at least 5,000 people for urban decarbonising zones).

Some relevant policies include:

> ***CA1: Climate Action - CA1 Objective 1:*** *Support the County Development Plan 2022 -2028 and the South Dublin County Climate Action Plan 2024 – 2029 in delivering the wider strategic climate objectives at local plan level.*
>
> ***CA2 Objective 2:*** *Seek to achieve the DZ carbon emissions targets as set out in the SDCC CAP 2024 – 2029 through collaboration with the community and relevant stakeholders, the utilisation of sustainable development principles and the promotion and adoption of best practice measures.*
>
> ***CA2: Clondalkin Decarbonisation Zone (DZ) - CA2 Objective 1:*** *Engage and support the emerging Decarbonisation Zone within Clondalkin and the surrounding area, facilitating co-ordination between SDCC Climate Action Plan and spatial planning to increase the impact and benefits that relevant plans and projects will have on the locality.*
>
> ***CA4: Renewable Energy – CA4 Objective 2:*** *Support renewable energy as part of new development and through retrofitting of existing buildings, including through an increase in solar panels, heat pumps, and micro wind energy where feasible.*

The Development Plan places a strong emphasis on the reduction of greenhouse gas emissions and the transition toward low-carbon patterns of development. In direct alignment with these objectives, all dwellings at Elmfield have been designed to achieve a Building Energy Rating (BER) of A2–A3, NZEB-compliant building design, all-electric heating systems, and potential for rooftop solar PV installation. This performance standard is supported by a high-quality, thermally efficient building envelope, enhanced levels of airtightness, and the integration of a fully electric heating system utilising air source heat pump (ASHP) technology.

Collectively, these measures are intended to minimise operational energy demand, reduce reliance on fossil fuels, and ensure long-term environmental sustainability, while also delivering improved

thermal comfort and lower energy costs for occupants. The Climate & Sustainability Report and Energy & Climate Action Report, prepared by Lawler's Consulting Engineers provides further detail in relation to the development's sustainability and methods of ensuring the development is achieving the decarbonization zone carbon emissions targets.

> ***CA6: Decarbonising Transport - CA6 Objective 1:*** *Support as appropriate, initiatives or interventions to help create a climate resilient, low carbon community in line with the roll out of the Clondalkin Decarbonisation Zone and implementation of the Local Transport Plan (LTP).*

The proposed development provides a reduced number of car parking spaces which is directly in line with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024). 202 no. car parking spaces are being proposed for the development. The development also provides a cycle and pedestrian pathway through the development along with 752 no. bicycle parking spaces to encourage sustainable transport solutions.

The Development Plan explicitly requires that all new developments incorporate Sustainable Urban Drainage Systems (SuDS) and demonstrate resilience to projected increases in rainfall intensity associated with climate change. In response, the proposed drainage strategy for the development integrates a comprehensive suite of SuDS measures designed to manage surface water in a sustainable and controlled manner. These measures will reduce surface water runoff rates, promote infiltration to ground where site conditions permit, and ensure that the development does not contribute to increased flood risk, either within the site boundary or in downstream catchments.

The coordinated integration of green and blue infrastructure forms a key component of this approach, delivering effective stormwater management while also supporting broader climate adaptation objectives set out in the Development Plan. The SuDS strategy provides both attenuation and storage capacity, enabling the system to absorb, store, and gradually release runoff during high-intensity rainfall events. This approach enhances the site's resilience to the more frequent and severe storm events predicted under future climate scenarios, while also contributing to improved water quality, biodiversity, and overall environmental performance. The Council is invited to refer to the Climate & Sustainability Report and Energy & Climate Action Report attached as part of the final planning application.

3.2.3 Green Infrastructure

Chapter 4 of the Clondalkin Planning Framework sets out the main vision and strategic objectives for Clondalkin. The Clondalkin LPF outlines the future vision for GI as follows:

> *"Promote the development of an integrated GI network for South Dublin County working with and enhancing existing biodiversity and natural heritage, improving our resilience to climate change and enabling the role of GI in delivering sustainable communities to provide environmental, economic and social benefits."*

Some relevant policies include:

> ***GI1: Green Infrastructure - GI1 Objective 1:*** *Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and*

further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.

GI2 Objective 2: *Ensure that all new development within the Clondalkin area strengthens the existing Green Infrastructure network where possible, to protect and enhance biodiversity, including by retaining natural features, as far as practicable, as part of site design.*

G16: Flood Risk Management – Objective 6: *To ensure that nature-based solutions are employed in new open spaces and any upgrades or revisions to existing open spaces to improve surface water quality and, where relevant, aid flood alleviation. To this end, have regard to SDCCs Sustainable Drainage Explanatory Design & Evaluation Guide 2022 and 'Implementation of Urban Nature Based Solutions – Guidance Document for Planners, Developers and Developer Agents' LAWPRO (November 2024.*

GI7: New Development – Objective 7: *To Improve the ecological value and connectivity of landscape features within new development through the implementation of the Green Space Factor, ensuring that all relevant developments meet the Green Space Factor score. In particular, ensure that all new development: a) Avoids sensitive sites and features through site location and/or site design. b) Retains natural features, to the greatest extent possible, as informed by ecological assessments. c) Provides for native tree and ecologically friendly planting on new development sites in line with public realm recommendations. d) Is designed in accordance with SDCC's Sustainable Drainage Explanatory, Design and Evaluation Guide 2022 or as amended and should incorporate Nature Based Solutions into the site design.*

GI7 Objective 2: *Demonstrate the proposed GI connectivity to be achieved within the site of all new developments, including to external areas, by retention / protection and enhancement of existing GI assets or where this is demonstrated and agreed not to be feasible, through the creation of new GI elements.*

GI8: Public Realm – Objective 1: *Facilitate SuDS and nature-based solutions within the public realm and streetscape, ensuring it integrated to the greatest extent possible alongside the required transport network*

The Development Plan establishes a clear Green Infrastructure Hierarchy within South Dublin. These are structured around 5 strategic themes which includes: Biodiversity, Sustainable Water Management, Climate Resilience, Recreation and Amenity (Human Health and Wellbeing), and Landscape, Natural, Cultural and Built Heritage. The vision, hierarchy, and strategic themes overall contribute towards the achievement of climate action targets. In direct alignment with the above-mentioned objectives, The proposed development seeks to provide landscaping and green infrastructure strategies which reinforce the existing vegetation corridors along the Grand Canal, supporting ecological connectivity. Further measures include the implementation of SUDs features, pedestrian and cycle linkages, encouraging greener connectivity across Clondalkin as well as contributing to water management, biodiversity, and climate resilience for the Camac River and Grand

Canal through its use of nature-based solutions. The Council are invited to review the landscaping report prepared by Austen Landscape Architects for further details.

9.2.4 Sustainable Movement

Chapter 5 of the Clondalkin Planning Framework sets out the main vision and strategic objectives for Clondalkin. The LPF introduces the Local Transport Plan (LTP) for Clondalkin and sets out its vision and key objectives in supporting sustainable movement.

Some relevant policies include:

SM1: Active Travel – Objective 1: *To deliver subject to detailed design including compliance with DMURS as appropriate, and further public consultation, as part of the local authority development process (Part 8) the active travel measures identified in Figures 5.7 and 5.8, which will enable better connected facilities throughout the Plan area and beyond, increase permeability and provide a safer walking and cycle network.*

SM1 – Objective 5*: Support and facilitate the Clondalkin Decarbonisation Zone (DZ) and its role in reducing carbon emissions, by supporting projects which provide active travel enhancements within the village and the surrounding area.*

SM1 – Objective 6*: To ensure that new development areas apply the principle of filtered permeability, providing for pedestrian and cyclist movement, discouraging through traffic by private car.*

SM2: Walking– Objective 2*: To support the development of future pedestrian crossing infrastructure and improvement projects outlined in Figure 5.7, subject to a reduction in speed limits and detailed review and design, including compliance with DMURS, to facilitate a mode shift and reduction in the usage of private motor vehicles and associated congestion.*

SM3: Cycling– Objective 2: *To ensure that new development areas apply the principle of filtered permeability, providing for pedestrian and cyclist movement, discouraging through traffic by private car.*

SM4: Permeability–Objective 2: *To ensure that proposed permeability links are designed in line with the NTA's best practice guidance and in such a way as to reduce the potential for anti-social behaviour, providing wide and inviting openings which are well lit.*

SM5: Priority, Secondary and Strategic Permeability Routes – Objective 4: *To ensure that new development and key lands maximise the potential for active travel connectivity between areas outside the village centre, including the Ninth Lock Framework site, to the village centre, local services and schools and to public transport.*

SM9: Road, Traffic and Junction Management – Objective 1: *To assess the need for junction improvements, upgrading where necessary, to improve road safety for all users, giving priority to those most vulnerable, while providing for traffic flow in and out of the village centre having due regard to the Spatial Planning and National Roads Guidelines for Planning Authorities 2012.*

SM10: Parking – Objective *1: To require developers of Large-Scale Residential Developments (of 100 units or more) or residential schemes located within 800 metres of high-capacity public transport*

routes to provide reserved space for car sharing schemes or mobility hub drop off points within the Plan area.

***SM10 – Objective 2**: To require that all car parking introduced aligns with the SPPR 3 – Car Parking of the Sustainable Residential Development and Compact Settlements Guidelines (2024) and the County Development Plan standards in Section 12.7.5 Car Parking / Charging for Electric Vehicles (EVs), or as may be superseded.*

***SM10 – Objective 3**: To promote on street communal EV charging in the form of EV Hubs in accordance with SDCC and ESB EV charging policies, guidance and specifications as part of Climate Action initiatives and the implementation of the Clondalkin Decarbonisation Zone (DZ)*

***SM11: Supporting Objectives – Objective 1:** Ensure that proposals for improved active travel and public transport have due regard to the heritage features within Clondalkin recognising the value that they bring to the enjoyment of the village and its surrounds. (see Chapter 7 Conservation and Built Heritage).*

The proposed development seeks to increase sustainable movement within Clondalkin in the form of pedestrian and cycle movements. This has played a significant role in the overall design and planning of the subject lands, encouraging a better connection to the surrounding area and village. The development includes the provision of a cycle and pedestrian route through the site, linking directly to Ninth Lock Road via Oakfield Road. Furthermore, the development has been designed in accordance with the relevant policies stated above, while proving for 202 no. car parking spaces including 18 no. EV parking spaces, in alignment.

It is submitted that the proposed development at Clondalkin is consistent with the transport and mobility policies and objectives. The proposed development will improve walking and cycling infrastructure within the area, as well as encourage existing and future residents to incorporate more sustainable movement throughout their daily lives.

9.2.5 Community, Homes and Employment

Chapter 6 of the Clondalkin Planning Framework sets out the main vision and strategic objectives for Clondalkin. The LPF highlights the strong importance of community infrastructure and open space provision within Clondalkin.

The relevant policies are as follows:

CHE1: Community Overarching – Objective 1: To support the expansion and enhancement of existing community facilities and / or the provision of new community facilities as the population grows to meet the needs of current and future residents, where required.

CHE3 Childcare Facilities – Objective 2: To require, in accordance with the provisions of the 'Childcare Facilities Guidelines for Planning Authorities' (2001) or any superseding guidelines, that a Childcare Facilities Audit is completed on all applications above 20 units assessing the type of residential units, emerging demographic profile and availability of existing childcare services in the vicinity and that provision is made for childcare facilities where there is an identified need.

CHE4 Children's Play Facilities – Objective 1: *To continue to deliver on play spaces within Clondalkin, ensuring that existing estates are considered for play provision in accordance with SDCC's Play Policy 2025-2030, and new residential and mixed-use developments include play spaces to the standard required as part of their design and delivery.*

CHE6: Public Open Space – Objective 1: *To apply the standards for public open space set out in Chapter 8 of the County Development Plan 2022-2028.*

CHE11: Core Strategy – Objective 1*: To monitor delivery of housing within the Clondalkin LPF to ensure that it aligns with the targets and related objectives set out in the core strategy of the County Development Plan.*

CHE12: Housing Typology – Objective 1*: To ensure that proposed development provides for an appropriate mix of housing typologies to support sustainable communities within the LPF area having due regard to the context of the site within a given area and the need to deliver appropriate densities in line with the Sustainable Residential and Compact Growth Guidelines 2024.*

CHE12 – Objective 2: *To support compact 'own door' typologies to deliver a more diverse and affordable form of housing which can support medium density development either on its own or in combination with higher residential development schemes, as appropriate to context.*

CHE12 – Objective 3*: To require proposed development to demonstrate how 'The Plan Approach' as set out in section 5.2.1 of the South Dublin County Development Plan 2022-2028 written statement has been taken into consideration including how the overarching principles for the achievement of successful and sustainable neighbourhoods has been integrated as part of the design proposal.*

CHE13: Density – Objective 1: *To ensure that housing density within the Plan lands meets with the provisions of the density ranges and criteria set out in the Sustainable Residential Development and Compact Settlement Guidelines 2024 (or as may be superseded).*

CHE14: Housing Options – Objective 1*: To support the provision of a mix of tenure types, housing sizes and typologies within Clondalkin LPF in the creation of sustainable and mixed income communities and, while supporting the delivery of social, cost rental and affordable housing by SDCC, LDA, AHBs or other relevant providers, discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social, social rental, cost rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) in line with the Housing Strategy and Interim HNDA of the South Dublin County Development Plan.*

The proposed development seeks to provide a childcare facility with the capacity to accommodate 31-35 children. Furthermore, the provision of play area has been included within the development which alignment with the above relevant policies. The proposed development offers a wide range of unit types, as well as 5 'own door' duplexes, to accommodate various lifestyles within Clondalkin. There is also provision for 82 units (20%) Part V, for a sustainable and mixed income community. The design and density of the propose development provides a sustainable, and high-quality residential scheme below the density requirements (185 dph) set out in the Compact Settlement Guidelines and to provide a higher standard of green space above the required amount set out in Chapter 8 of the LDP.

It is with this regard, that the proposed development directly aligns with the relevant policies outlined above.

For further information in this regards the Council are invited to review the Community and Social Infrastructure Audit prepared by DOWNEY.

9.2.6 Conservation and Built Heritage

Chapter 7 of the Clondalkin Planning Framework sets out the main vision and strategic objectives for Clondalkin's conservation and built heritage within the LPF boundary.

The relevant policies are as follows:

CBH1: Overarching – Objective 1: *To ensure that development complies with the objectives set out in the built heritage section of the South Dublin County Development Plan Written Statement (Chapter 3), as appropriate, complemented by the objectives set out in this plan and that regard is had to the Architectural Heritage Protection Guidelines for Planning Authorities, DAHG (2011).*

CBH4: New Development – Objective 1: *To support placemaking initiatives and village enhancement schemes in making the village and its surrounds more attractive to residents, businesses and visitors, improving the urban environment, the sense of identify and community wellbeing.*

CBH4 – Objective 5: *To encourage new developments to generate niches of public space or urban pocket parks, where favourable orientation allows, as buffers to transition between new and established urban environments, complementing the functioning and patterns of established historic urban areas.*

CBH4 – Objective 6: *To assess new development in terms of its response to the historic patterns of development to avoid homogenisation of the architectural environment.*

As previously mentioned within this application, the development aligns directly with the policies stated above. The applicant has engaged qualified professional consultants to assess any potential conservation and built heritage impacts associated with the proposed development, both on the site itself and within the surrounding area. The Council is therefore invited to review the comprehensive suite of environmental reports and assessments submitted in support of this application.

The AA Screening concluded that in relation to Natura 2000 sites there would be no significant effect predicted from the proposed development. The EclA Report completed on the site further concluded that the mitigation measures in place would not have any negative impacts upon the existing built ground, vegetation or any species of conservation on-site during any time of the development.

10.0 APPROPRIATE ASSESSMENT AND EIA SCREENING

A Screening for Appropriate Assessment has been prepared by Altemar and has confirmed that a Natura Impact Assessment is not required. A Bat Survey and Ecological Impact Assessment have also been prepared by Altemar and are submitted under separate cover.

The proposed development does not meet or exceed any of the thresholds for a mandatory EIA and this has been confirmed in the EIA Screening Report by DOWNEY, which is submitted under separate cover.

11.0 CONCLUSION

This Planning Report and Statement of Consistency has been prepared in support of the proposal to develop a Large-Scale Residential Development on lands at Elmfield, Ninth Lock Road, Clondalkin, Dublin 22.

The applicant is committed to delivering a high-quality development within Clondalkin, with a diverse range of residential unit types, attractive public open space as well as a creche.

The proposed development will provide all associated public open space and play area, 202 no. car parking spaces including accessible parking and Electric Vehicle parking, bin/waste store and a plant room at ground floor level; 1 no. detached ESB substation. The proposed development will also provide for all associated site development and infrastructural works including foul and surface water drainage, roads, footpaths, landscaping and boundary treatment.

The proposal will provide a high-quality development, with an appropriate mix of units and an acceptable density of development proposed catering to a range of people at varying stages of the lifecycle and responding to existing need in the area.

The proposed development is in accordance with the land use zoning and local planning policy pertaining to the subject site. The subject site is suitably located within an existing built-up area and is well served by existing public transport, notwithstanding public transport improvements such as BusConnects, as well as other commercial, recreational, and other local services and amenities for future residents.

It is therefore respectfully submitted by DOWNEY, on behalf of our client, Thornmeadow Developments Limited, that South Dublin County Council grant permission for this application.