



THORNTON O'CONNOR
TOWN PLANNING

Planning Report & Statement of Consistency

**Prepared in Respect of a Large-Scale
Residential Development at Milltown
Park, Sandford Road, Dublin 6**

**Submitted on Behalf of Sandford Living
Limited**

December 2025

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1.0 INTRODUCTION

Thornton O'Connor Town Planning¹ in association with a multidisciplinary team have been retained by Sandford Living Limited² to prepare an application for a Large-Scale Residential Development ('LRD') comprising the demolition of some of the existing structures on site (c. 4,847.5 sq m) and the construction of a Residential-led Mixed-Use Development at a c. 4.26 Ha site at Milltown Park, Sandford Road, Dublin 6. The total application area also includes external road works (Milltown Road and Sandford Road) and drainage works (Eglinton Road) providing an application site area of c. 4.74 Ha.

1.1 Application for Development

The proposed development principally comprises 562 No. residential units in addition to a creche, cultural/community space, and a café. The subject planning application falls within the definition of Large-Scale Residential Development as defined under the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021* which is—

"a) The development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;

b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;

c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or

d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c).

where the LRD floor space of—

(i) in the case of paragraph (a), the buildings comprising the houses,

(ii) in the case of paragraph (b), the student accommodation,

(iii) in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation, is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development." [Our Emphasis]

The subject planning application proposes 562 No. residential units in addition to a creche, a café/restaurant, and cultural/community space at the subject lands and thus is considered a Large-scale Residential Development. Furthermore, the non-residential element of the proposed scheme (c. 2,949 sq m) represents 5.9% of the total gross floor space above ground floor level and 4.9% of the total gross floor space including basement level of the development and thus is considered to be an LRD application.

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The purpose of this Report is to provide an overview of the proposed development, demonstrating why the proposal is appropriate at the subject site and ultimately to seek the support of the Planning Authority for the proposal.

1.2 Description of the Proposed Development

The subject lands were purchased by Sandford Living Limited with the intention of developing a high-quality residential development along with an extensive range of public open spaces that will be available to the wider community. In summary, the development proposes the demolition of a number of former Institutional vacant structures (Milltown Park House, Milltown Park House Rear Extension, the Finlay Wing, the Archive, the link building between Tabor House and Milltown Park House rear extension to the front of the Chapel), the refurbishment and reuse of Tabor House and the Chapel and the construction of 562 No. residential units. The development also comprises public and communal open spaces, in addition to a creche, a café/restaurant and community/cultural space.

The full description of the proposed development, as stated in the Statutory Notice, is as follows:

“Sandford Living Limited intend to apply for permission for a Large-Scale Residential Development at a c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development’s surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The development will principally consist of: the demolition of c. 4,847.5 sq m of existing structures on site including Milltown Park House (880 sq m), Milltown Park House Rear Extension (2,031 sq m), the Finlay Wing (622 sq m), the Archive (1,240 sq m) and the Link Building between Tabor House and Milltown Park House Rear Extension to the front of the Chapel (74.5 sq m); the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m) and the provision of a single storey glass entrance lobby to the front and side of the Chapel (52 sq m); and the provision of 562 No. residential units comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units).

Block A1 will range in height from 5 No. storeys to 8 No. storeys and will comprise 81 No. apartment units; Block A2 will range in height from 6 No. storeys to 8 No. storeys and will comprise 139 No. apartment units; Block B will range in height from 3 No. to 7 No. storeys and will comprise 74 No. apartment units; Block C will range in height from 4 No. storeys to 7 No. storeys and will comprise 151 No. apartment units; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 30 No. apartment units; Block E will be 2 No. storeys in height and will comprise 6 No. courtyard type houses; and Block F will range in height from 5 No. storeys to 7 No. storeys and will comprise 81 No. apartment units.

The development also includes the provision of: cultural/community space within Tabor House (4 No. storeys including lower ground floor level) and the Chapel (2 No. storeys including lower ground floor level and mezzanine level) (1,698 sq m) with associated outdoor space (248 sq m); a café/restaurant (179 sq m) and a creche (375 sq m) within Block F with associated outdoor creche play area; ancillary residents' amenities and facilities (324 sq m) within Blocks B & C; and a single storey bin store and substation adjacent to Block F (101 sq m).

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 319 No. car parking spaces (288 No. at basement level and 31 No. at surface level); set down area for deliveries; bicycle parking; 22 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; hard and soft landscaping including public open space and communal open space; green/blue roofs; PV panels; substations; lighting; plant; lift cores and overruns; and all other associated site works above and below ground.

The proposed development has a gross floor space of c.50,196 sq m above ground level over a partial basement (under part of Blocks A1 and A2 and under Blocks B and C) measuring c. 10,550 sq m, which includes parking spaces, bin storage, bike storage and plant."

1.3 History of the Application Site

1.3.1 Former Jesuit Community Lands Sold to the Applicant

Up until 2019, the existing buildings and lands at the application site were formally utilised by the Jesuit Community for institutional purposes. For more than 160 years, the role of the Milltown Park community has been the formation of Jesuits, and since the 1960s, instruction of a dozen other religious congregations in Theological and Pastoral Ministry. Since the 1960s these studies were expanded to include the education of lay people as part of a move towards greater lay involvement in Church Ministry. Both these areas have experienced a dramatic decline and falling vocations leading the Jesuit Society to close these facilities and seek other options for training of priests. The institutional operations on the site ceased permanently in 2015 and the property was vacated by the Jesuit order in 2019.

As a result of this decline experienced by the Jesuits and departure of the clerical students from the application site, the site was sold to the Applicant in 2019 and comprises a range of former institutional buildings and large unutilised green spaces which have become surplus to the Jesuit Community's requirements and are no longer required for the purposes of its function and mission.

These vacant buildings became impossible to maintain by the Jesuit Community which has left the site redundant and ultimately lead to its sale to the Applicant in 2019, in order to provide a sustainable use of the lands. The Jesuits have retained Milltown Park Community House and Cherryfield Lodge Nursing located on adjoining lands. Prior to disposing of the subject property, the Jesuit Community considered their future requirements thoroughly and have confirmed that the lands that they have retained are entirely adequate for their future needs.

In this regard, planning permission has recently been granted by Dublin City Council for a new modern archive building (DCC Reg. Ref. 3116/22) within the retained Jesuit lands; lands that were retained for this purpose. Planning permission has also been granted for 'separation works' between the Jesuit lands and the subject site (DCC Reg. Ref. 3866/20 (ACP Reg. Ref. PL29S.311552)). These 'separation works' were included as a condition of sale when the Jesuits' sold the surplus lands to the Applicant. The works included the demolition of a link building that connected the Milltown Jesuit Centre (within the Jesuits' land) to the Milltown Park Rear Extension within Sandford Living Limited's land and the construction of a 2.4-metre-high boundary wall. These works have since been carried out and essentially separate the lands that are retained by the Jesuits to the south from the lands within the ownership of Sandford Living Limited that are proposed to be developed as part of this LRD Application.

1.3.2 Previous Strategic Housing Development Currently Remitted Back to an Coimisiún Pleanála

A Strategic Housing Development (SHD) was previously permitted by An Bord Pleanála in December 2021 on the subject site for 667 No. dwellings³ (principally Build-to-Rent), a creche, communal internal amenity and facilities and public and communal open spaces, with heights ranging from part 2 No. to part 10 No. storeys (ACP Reg. Ref. ABP-311302-21). Permission was granted on 23rd December 2021.

This Grant of Permission was subsequently Judicially Reviewed and has now been remitted back to An Coimisiún Pleanála (ACP) at the time of writing this EIAR and awaits a decision. This applications new Reference No. is TA29S.322160.

We note that the Applicant has legal advice that section 37(5) of the 2000 Act does not apply where the matter pending before the Commission is a direct application, such as an SHD application, and is not considered the "subject of an appeal".

1.3.3 Change of Zoning Since SHD Application

The zoning of the site changed with the adoption of the new *Dublin City Development Plan 2022-2028* ('*Development Plan*'), changing from Objective Z15 '*Institutional and Community*' in the *Dublin City Development Plan 2016 – 2022* to Objective Z12 '*Institutional Land (Future Development Potential)*'.

This zoning change is in our opinion, a recognition of the fact that the lands are no longer institutional and have not been since prior to 2019 when the lands were sold to the Applicant.

1.3.4 Previous Large-Scale Residential Development Currently Subject to Judicial Review

Dublin City Council previously decided to Grant Permission for a Large-Scale Residential Development (referred to herein as 'LRD 1') in August 2023 on the subject site for 636 No. dwellings, a creche, cultural/community space and public and communal open spaces, with heights ranging from part 2 No. to part 10 No. storeys (DCC Reg. Ref. LRD6026/23-S3).

This scheme was amended to reflect the policies and objectives of the new *Dublin City Development Plan 2022-2028*, which was adopted in December 2022. One of the main changes in the new *Development Plan* relates to Objective CUO25 which requires LRDs and regeneration areas to dedicate 5% of the scheme's floor space to cultural/community use.

³ Reduced from 671 No. units via condition.

Subsequent to Third-Party Appeals against DCC's decision, permission was granted by An Coimisiún Pleanála on 19th December 2023 (ACP Reg. Ref. ABP-317921-23).

This Grant of Permission was subsequently Judicially Reviewed and a Decision from the High Court is awaited at the time of writing this Report. As will be detailed further in this Report, the main changes proposed in the new LRD scheme (referred to hereafter as 'LRD 2') relate to additional commercial floor space, a reduction in the number of units proposed and building heights, and the reduction of cultural/community floor space (albeit an increase in residential amenity space).

1.3.4.1 Summary of Key Changes in LRD 2 from LRD 1

- The total number of residential units has reduced from 636 No. to 562 No. (74 No. fewer units).
- Block A1 reduced from a maximum height of 10 No. storeys to 8 No. storeys.
- Block C changed from part 2 No. storeys to Part 8 No. storeys (including part double height at ground floor level) to part 4 No. storeys to part 7 No. storeys (including a mezzanine at ground floor level).
- Block E changed from 24 No. 3-storey duplexes and apartments to 6 No. 2-storey courtyard houses. The lower Block E has also been set-back further from the western boundary providing greater separation from the dwellings along Cherryfield Avenue Lower and Upper. This has also allowed the retention of a large portion of the treeline located towards the western boundary.
- The proposed LRD 2 will introduce a new commercial use which was not included in the previous LRD 1 scheme in the form of a café/restaurant (c. 179 sq m). The total non-residential floor space has increased from 2,569 sq m to 2,949 sq m.
- LRD 2 omits any works relating to the separation works and provision of a new boundary wall between the subject site and the Jesuit lands including the demolition of the red-brick link building. This work has been completed as it was subject to a separate Section 34 'Separation Works' application.

1.3.5 Proposed Large-Scale Residential Development

When acquiring the site, the Applicant duly considered the zoning objective pertaining to the lands (at the time) which were zoned Objective Z15 '*Institutional and Community*' in the *Dublin City Development Plan 2016 – 2022*, where 25% public open space was required, beyond the standard 10% typically required for a residential development on lands within the administrative area of Dublin City Council.

As noted above, the zoning of the site has now changed to Objective Z12 '*Institutional Land (Future Development Potential)*' under the new *Dublin City Development Plan 2022-2028* (which came into effect in December 2022). The provision of a Z12 zoning on the land, like the previous SHD and LRD 1, will continue to provide 25% public open space on the site and will open the site up to the public for the first time. As it stands, the subject site is closed to the public and has never had any existing community or public open space function on the lands as the site was

always in private religious use; a use that is no longer required as was clearly demonstrated in the previous SHD & LRD 1 application documents and as accepted by Dublin City Council and An Coimisiún Pleanála.

In addressing the particular characteristics of the site, namely a large volume of vacant institutional buildings, a key requirement early in the design process was to determine which buildings could be functionally retained and reused within the development. In addition, the requirement for 25% public open space has been considered in line with the former Z15 zoning objective pertaining to the lands (now Z12, which also requires 25% public open space). In this regard, it is important to note that the lands have always been walled and gated and in private use by the Jesuit Community and closed off from the public up until their sale and will now be opened up for the first time to the public. The public have never enjoyed any right of access to these privately owned lands as confirmed by the Jesuits in their letter enclosed as Appendix A to this Planning Report.

The development layout was framed around these key design considerations and thus the development now proposed has utilised the remainder of the site to provide a range of residential units, a generous quantum of commercial uses (creche and café) and some community/cultural space, as detailed extensively throughout this Report and accompanying documentation.

Having regard to the key design considerations above, Tabor House and the Chapel will be reused and refurbished within the development. Tabor House will provide 1,036 sq m of cultural/community space, while the Chapel will provide 662 sq m of cultural/community space, in addition to associated outdoor space (248 sq m).

The development will also significantly exceed the requirement to provide 25% public open space, as required by the Z12 zoning objective. Please see images below prepared by Cameo and Partners Design Studio which demonstrates the large quantum of public open space provided within the proposed development (35.3% of the developable site area).

Full details in relation to the proposed development and scheme layout have been set out in this Report, the *Masterplan + Design Statement* by O'Mahony Pike Architects (OMP) and the *Landscape Design and Access Statement* prepared by Cameo and Partners Design Studio (Cameo).



Figure 1.1: Extract of Ground Floor Illustrative Landscape Masterplan

(Source: Cameo and Partners Design Studio, 2025)

1.4 Key Changes to the LRD 1 Since the SHD Application

We have set out above the key changes from LRD 1 to LRD 2 now proposed and in the interest of clarity, we will set out the key changes relating to LRD 1 when compared to the SHD application (with the SHD currently remitted back to An Coimisiún Pleanála):

- The zoning of the site changed from Z15 to Z12 under the most recent *Development Plan*.
- Build-to-Rent units were removed from the development thus providing a 100% Build-to-Sell development of 636 No. units.
- Tabor House proposed residential units in the SHD and the Chapel proposed to provide resident amenity space for the Build-to-Rent elements of the SHD scheme. Tabor House and the Chapel was proposed to be used in the LRD 1 scheme as community/cultural

space in order to accord with the requirements of the new *Development Plan* (5% community/cultural space required), which was not required under the previous *Development Plan* when the SHD application was submitted. Part of Block A1 was also proposed to be community/cultural space in LRD 1.

- The number of units reduced from 671 No. units proposed in the SHD Application (and 667 No. ultimately granted) to 636 No. units proposed in the LRD 1 Application due to the following:
 - 4 No. units removed from Block E as a result of Condition 2(a)⁴.
 - Change of unit mix to accord with standards for Build-to-Sell i.e. maximum 50% studios and 1 beds.
 - As a result of the change to Tabor House, 24 No. residential units were omitted in order to provide the required cultural/community space. A new outdoor pavilion space (known as the 'Secret Garden') was also added to the rear of Tabor House and the Chapel to serve the cultural/community use.
- Balconies were added to all studios whereas previously some new studios were not provided with balconies due to the flexibility allowed for Build-to-Rent units of the SHD.

Overall, there were no material change proposed to the height, scale, massing of the proposal from the SHD to LRD 1. The building heights granted in LRD 1 were the same as those proposed and granted in the SHD.

Externally, the visible changes principally comprised some additional balconies, the removal of part of Block E and amendments to elements of the landscaping to reflect the new policies in the *Development Plan*, namely SuDS policies and the provision of an improved area for biodiversity to the north of Blocks B & C as requested by the Parks Department at the LRD 1 Opinion Stage.

1.5 Guidelines and Plans

This Report principally includes reference to the following National, Regional and Local Guidelines and Plans:

National

- *Project Ireland 2040 – The National Planning Framework First Revision (2025) ('NPF');*
- *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016);*
- *Housing for All—a New Housing Plan for Ireland (2021) ('Housing for All');*
- *Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness 2025-2030;*
- *Urban Development and Building Heights – Guidelines for Planning Authorities (2018) ('Building Height Guidelines');*

⁴ Condition 2(a) required the omission of the standalone duplex apartment block that comprises 4 No. units at the southern section of Block E and their replacement with open space or for a use to be determined by a future planning application. The area comprises landscaping in the LRD 2 Application.

- *Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025) ('Apartment Guidelines');*
- *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024) ('Compact Settlement Guidelines');*
- *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
- *The Planning System and Flood Risk Management (2009);*
- *Childcare Facilities: Guidelines for Planning Authorities; and*

Regional

- *Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031 ('RSES');* and

Local

- *Dublin City Development Plan 2022-2028 ('Development Plan').*

Please refer to Sections 6.0, 7.0 & 8.0 for an assessment of the scheme's consistency with the full range of relevant Guidelines and Plans.

2.0 RATIONALE FOR THE PROPOSED RESIDENTIAL DEVELOPMENT

We have set out in Section 1.3 that the key tenet at the outset of the development was retaining any existing buildings that could be functionally re-used, and providing (and exceeding) the 25% quantum of public open space required to comply with the site's Z12 zoning objective under the *Development Plan*.

The subject site was purchased by the Applicant in 2019 with the intention of developing a high-quality development on a key accessible site in proximity to frequent public transport, employment locations, services and facilities in Dublin. We consider that the proposed development is appropriate having regard to recent national policy, which requires the densification of sites in core urban locations such as the subject site. This section will set out a rationale for providing a range of residential units for this area of Dublin City, including apartments ranging from studios to three bed units and three bed houses.

2.1 Responding to Policy Set out in National & Local Planning Policy Relating to Compact Growth & Demographic Changes

Section 4.5 of the *NPF* promotes the compact growth of urban areas and acknowledges that Ireland's housing crisis have restricted people from living close to where they work or near to services and amenities:

"At a time when many people wish to live close to where they work and to the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained."

The *NPF* further calculates in Section 6.6 that:

"Between now and 2040, an average output of approximately 50,000 new homes will need to be provided in Ireland every year to meet people's needs for well-located and affordable housing, with increasing demand to cater for one- and two-person households."

In addition, Appendix 3 of the *Dublin City Development Plan 2022 – 2028* states that:

"A varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the proposal contributes to healthy place making, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods."

It is our professional opinion that, as will be demonstrated in this Report, the subject lands are eminently suitable to provide higher density residential accommodation in proximity to high frequency public transport, employment locations, services and facilities, which can meet the housing needs of a greater number of persons and will address the acute housing shortage and the significant demand that exists in Dublin. In addition, the provision of a café/restaurant, community/cultural space, and a crèche will significantly enhance the provision of social infrastructure in the wider area. The range of open spaces will also significantly enhance the local area. Therefore, the proposed development will contribute to healthy place making and will improve the liveability and identity of the area.

2.2 The Site is Eminently Suitable for the Proposed Residential Development Having Regard to the Accessible Location of the Subject Site

The accessibility of the subject site is detailed extensively in Section 3.4. However, the following provides a summary of the accessible of the subject site proximate to significant employment locations, public transport options, and services.

Significant Employment Locations

- The site is located within c. 350 metres/c. 6 minutes walking distance of Clonskeagh Hospital, c. 1.4 km/c. 17 minutes walking distance of The Royal Hospital Donnybrook and c. 1.5 km/c. 19 minutes walking distance of University College Dublin.
- A group of office parks located within Clonskeagh, within c. 1 km/ c. 13 minutes walking distance of the site. This includes: Belfield Office Park, Richview Office Park, Beech Hill Office Campus which contains employers such as Environmental Protection Agency (EPA), AIB, Circle K Head Office, Luma Vision, O’Leary Insurance Group, Mars Capital, Pinergy, Rugby Players Ireland, KSN Construction Consultants and Project Managers and National Shared Services Office (formally PeoplePoint);
- Ballsbridge is within c. 1.5 km/c. 20 minutes walking distance which contains the RDS, Meta Head Office, Zurich Insurance, Harvest Financial Services, Coimisiún Na Meán (Media Commission), Irish Research Council, Eirgrid, IBM, Workplace Relations Commission, and in addition to many embassies, hotels, bars and restaurants;
- The site is located in proximity to many neighbourhood and district centres such as Donnybrook which contains the RTE Studios (c. 1.4 km/c. 17 minutes walking distance) and the Dublin Bus Depot (c. 750 metres/c. 9 minutes walking distance) and Rathmines which contains the Swan Shopping Centre (c. 1.7 km/c. 22 minutes walking distance—just outside of the 1.5 km/15 minute range outlined above but it is worth noting its proximity) and the Central Statistics Office (c. 2 km/c. 25 minutes walking distance—just outside of the 1.5 km/15 minute range outlined above but it is worth noting its proximity); and
- The Canal which defines the City Centre, is located within c. 1.6 km/c. 25 minutes walking distance of the subject site (just outside of the 1.5km/15 minute range outlined above but it is worth noting the proximity of the Canal) which contains significant employers such as Zendesk EMEA Headquarters, Amazon Ireland, Sky Ireland, CBRE, Designbank MBD, LinkedIn, Azets, and Marsh McLennan.
- Please see Figure 2.1 below for the location of the abovementioned areas to the subject site.

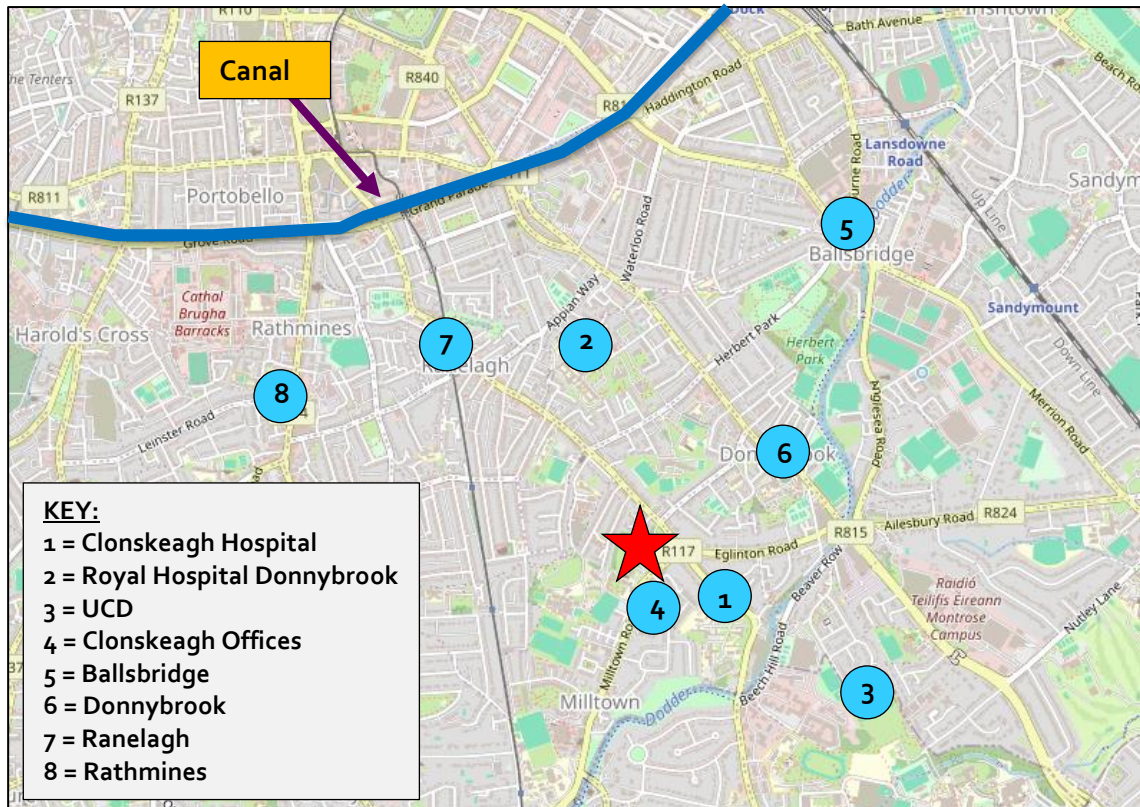


Figure 2.1: Map Demonstrating Location of Nearby Employment Location Areas Proximate to the Subject Lands (Indicate Location Indicated by a Red Star)

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2025)

Public Transport

- As illustrated in Figure 2.2, the subject site is located in proximity to the following Green Line Luas stops:
 - Beechwood: c. 720 metres as the crow flies (1 Km walk/ c. 13 minute walk)
 - Cowper: c. 740 metres as the crow flies (c. 1.3 Km walk/ c. 17 minute walk)
 - Milltown: c. 918 metres as the crow flies (c. 1.3 Km walk/ c. 17 minute walk)
 - Ranelagh: c. 1.1 Km as the crow flies (c. 1.1 Km walk/ c. 14 minute walk)
- The Green Line Luas allows easy access to a significant quantum of employment locations throughout the City Centre, North and South Dublin City, North and South of Dublin County in addition to the opportunity for users to change onto the Red Line Luas at O'Connell Street/Abbey Street which would provide access to employment locations to the east and west of the City Centre.

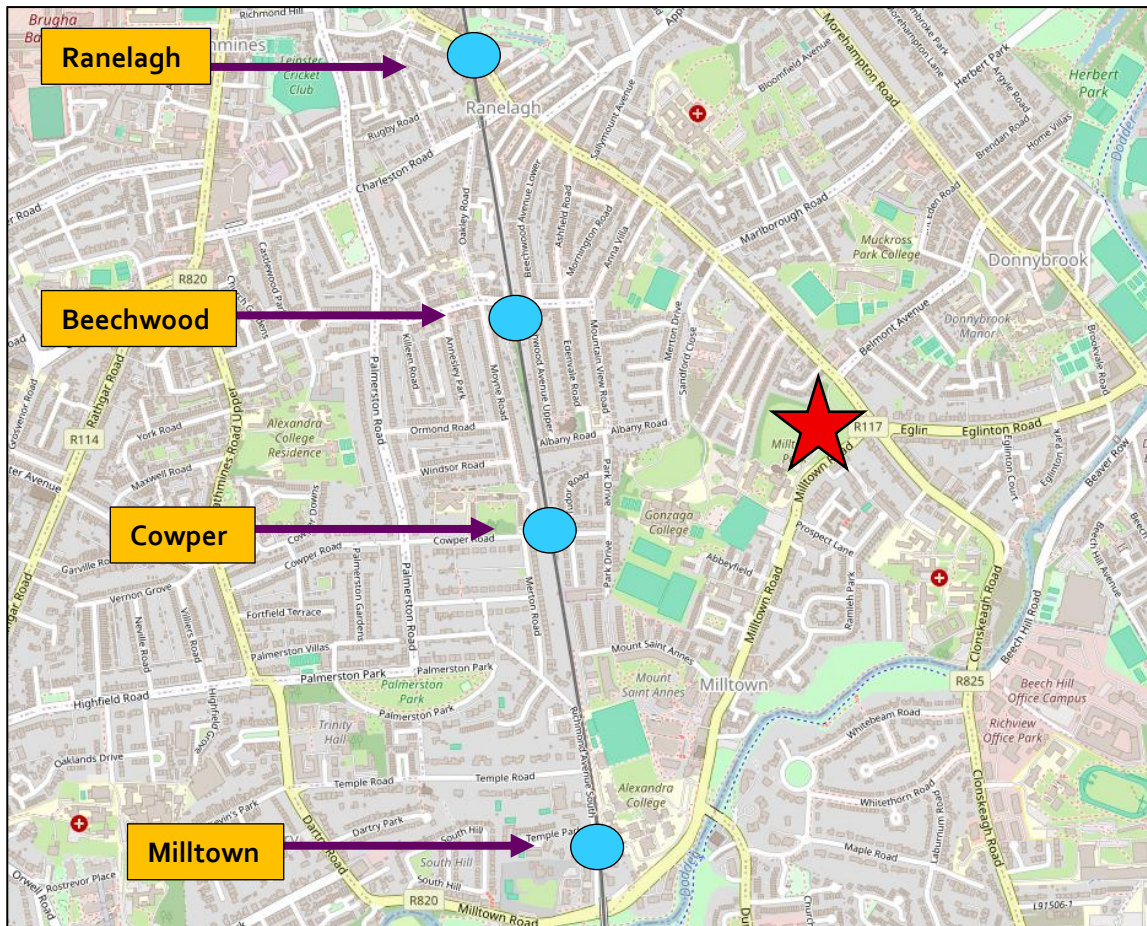


Figure 2.2: Location of the Nearest Luas Stops in Proximity to the Subject Site (Indicative Location Indicated by a Red Star)

(Source: www.openstreetmap.org, Annotated by Thornton O'Connor Town Planning, 2025)

- As illustrated in Figure 2.3, the nearest bus stop to the subject site is stop No. 855 located directly opposite the subject site along Sandford Road. This bus stop provides a c. 2–15-minute peak frequency bus service by facilitating the No. 11, 44 & 44D bus routes. The bus stop providing the alternating services is located only c. 50-metres north of the subject site along Sandford Road (stop No. 884).
- In addition to bus stop Nos. 855 & 884, there is a multitude of bus stops located within c. 1-km / c. 14-minute walk of the subject site such as:

- [Stop No. 775](#)
- [Stop No. 758](#)
- [Stop No. 773](#)
- [Stop No. 772](#)
- [Stop No. 760](#)
- [Stop No. 2899](#)
- [Stop No. 2815](#)
- [Stop No. 851](#)
- [Stop No. 903](#)

- The location of these proximate bus stops is illustrated in Figure 2.3 and details of their distance to the subject site, peak frequency, and the bus routes that serve the stop are provided in Section 3.4.3.

We note that more bus stops are located within 1-km / 14-minute walk of the subject site, however, these have not been identified above or in Figure 2.3 below as they operate the same bus routes serving bus stops located closer to the subject site.

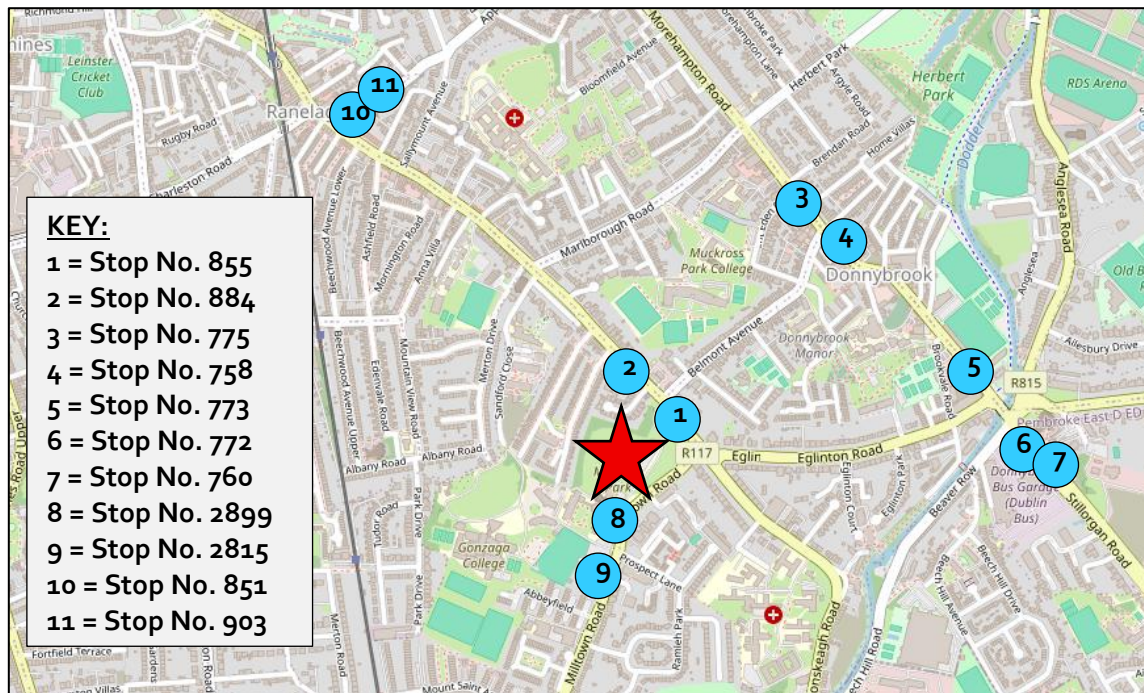


Figure 2.3: Location of Nearby Bus Stops in Proximity to the Subject Site (Indicative Location Indicated by a Red Star)

(Source: www.openstreetmap.org, Annotated by Thornton O'Connor Town Planning, 2025)

Therefore, as set out above, the subject site can be considered suitable for a Large-Scale Development having regard to its highly accessible location, in proximity to significant employment locations; services, facilities & amenities; and public transportation options.

2.3 Demographics of the Area

This section discusses the demographics of the surrounding area. According to the Summary Results of the Census 2022, which were issued on 30th May 2023, the population of Ireland has exceeded five million for the first time in 171 No. years⁵. This has resulted in an 8% increase since the 2016 Census. Therefore, this highlights the critical need to provide additional housing in our serviced areas, which is also well documented in planning policy and anecdotally and empirically in national media.

⁵<https://www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/keyfindings/>

The subject site is located in the Rathmines East B Electoral Division (ED) which recorded an average of 2.3 No. persons per private household in 2022. This was lower than the national state average of 2.7 No. persons and the Dublin average of 2.5 No. persons (see Table 2.1 below).

Average Household Size			
Area/ED	No. of Households	No. of Persons Accommodated	Average Household Size
Rathmines East B ED ⁶	2,413	5,571	2.3
Dublin City ⁷	225,685	560,493	2.5
Republic of Ireland ⁸	1,841,152	5,046,681	2.7

Table 2.1: Average Household Size of the Rathmines East B ED, Dublin City and the State

(Source: Census 2022/CSO)

Therefore, the ED is predominated by smaller households and it is important to provide choice for such household formations such as in the subject scheme with a predominance of studio, one- and two-bedroom units with some three-bedroom units also provided.

In addition, of the 2,413 No. households recorded in the Rathmines East B ED in the 2022 Census, some 1,096 No. were noted as a 'flat/apartment' (45.5%) thus demonstrating the area is already accustomed to providing such higher-density housing types and confirms the suitability of the subject site to deliver additional apartment units in this context.

Household Type in Rathmines East B ED ⁹		
	No. of Households	%
Houses / Bungalow	1,304	54%
Flats / Apartments	1,096	45.5%
Bed Sit	13	0.5%
Caravan / Mobile Home	0	0%
Total	2,413	100%

Table 5.3: Type of Households in the Rathmines East B ED

(Source: Census 2022/CSO)

Having regard to the above tables, it can be concluded that the correlation between household sizes and types is relatively proportionate given the high quantum of apartments, which typically cater for smaller household sizes, is reflective of the average household size for the ED (2.3 No. persons).

It is our opinion that there is a significant opportunity to provide a mix of studio, one, two and three bedroom units in this area of Dublin, which will better serve the demographic profile of the ED, allowing people to purchase their first home in the area or to trade down from large houses to smaller units in a high quality parkland and historic building setting.

⁶ <https://visual.cso.ie/?body=entity/ima/cop/2022&boundary=Co4167Vo4938&guid=2ae19629-1dd4-13a3-e055-00000000001&theme=4>

⁷ <https://visual.cso.ie/?body=entity/ima/cop/2022&boundary=Co3789Vo4537&guid=2ae19629-1433-13a3-e055-00000000001&theme=4>

⁸ <https://data.cso.ie/> - SAP2022T5T2ED

⁹ <https://visual.cso.ie/?body=entity/ima/cop/2022&boundary=Co4167Vo4938&guid=2ae19629-1dd4-13a3-e055-00000000001&theme=5>

The proposed development responds directly to this local demographic profile by providing additional, high-quality apartment accommodation that aligns with the established housing mix and meets the evident demand for smaller household units. The delivery of apartments at this location represents an appropriate and sustainable form of development, consistent with national and local planning policy objectives promoting compact growth, efficient land use, and the creation of mixed and balanced communities.



3.0 SITE LOCATION, DESCRIPTION AND CONTEXT

3.1 Site Location and Description

The total red line application site boundary is c. 4.74 Ha (c. 47,335 sq m) and is broken down as follows:

1. The developable site of c. 4.26 Ha (c. 42,547 sq m) at Milltown Park, Sandford Road;
2. Road works to Milltown Road and Sandford Road adjacent to the 2 No. entrances to the site (1 No. existing and 1 No. newly proposed): c. 0.16 Ha (c. 1,597 sq m); and
3. Drainage works from Milltown Road to Eglinton Road: c. 0.32 Ha (c. 3,191 sq m).

For the rest of this Report, the site area will be referenced as c. 0.93 Ha as this is the main development site and is the figure utilised when discussing plot ratio, site coverage, density, etc.

The subject application site is located at the corner of Sandford Road and Milltown Road, Dublin 6. The developable lands are bounded to the north by Norwood Park and Sandford Road, to the east by the Milltown Road, to the south by a carpark associated with the Milltown Park Institutional and Community premises (buildings retained by the Jesuits after the disposal of the 'developable lands') and to the west by 2 No. storey existing residential dwellings located on Cherryfield Avenue Upper and Cherryfield Avenue Lower.



Figure 3.1: Aerial View of Subject Site (Indicative Boundary Outlined in Red)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2025)

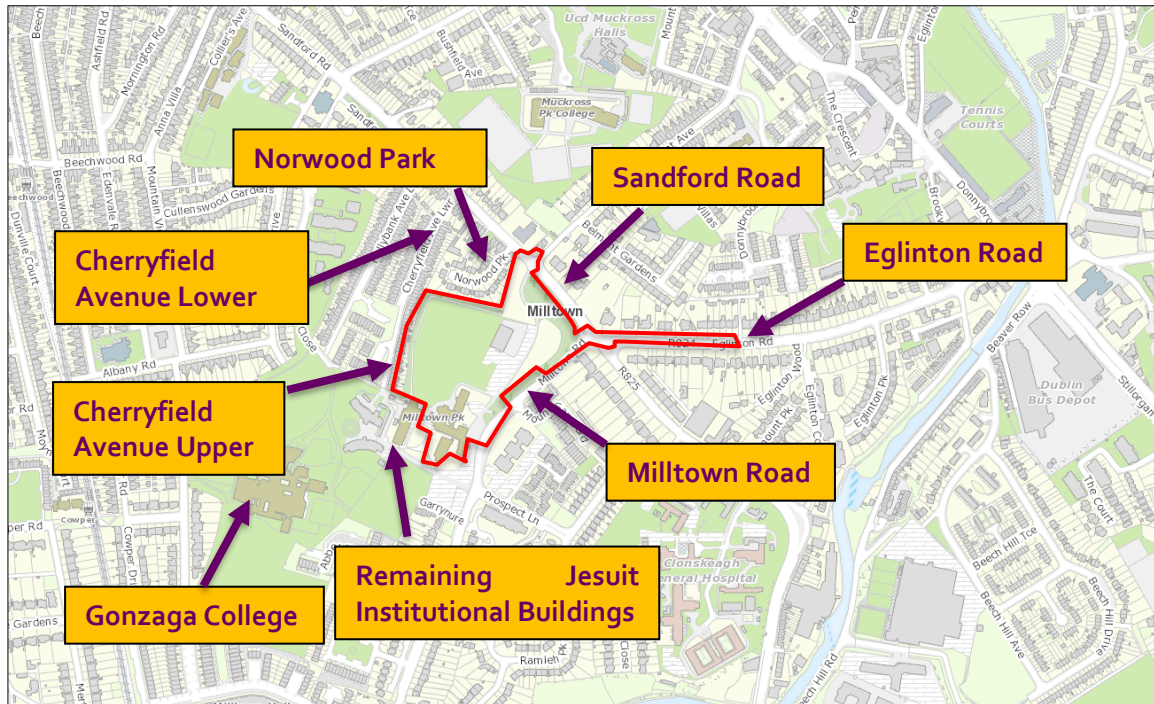


Figure 3.2: Location of Subject Site (Indicative Site Boundary Outlined in Red)

(Source: www.myplan.ie, annotated by Thornton O'Connor Town Planning, 2025)

3.2 Details of the Existing Buildings

The subject site is irregular in shape and has a generally flat topography. The current building range at the subject site comprises the original Milltown Park House building with 5 No. extensions attached to the original structure. The buildings are positioned in the southern corner of the subject site which formed part of the Jesuit Campus at Milltown Park and which is no longer in use at the site. The remainder of the subject site is largely undeveloped.

As a result of the decline experienced by the Jesuits and departure of the clerical students from the application site, the site was sold to the Applicant and comprises a range of former institutional buildings and large unutilised green spaces which have become surplus to the Jesuit Community's requirements and are no longer required for the purposes of its function and mission.

The site is currently accessed from Sandford Road to the north of the site, however we note that the public have never enjoyed any right of access to these privately owned lands. The existing entrance from Milltown Road into the remaining Jesuit lands is not in the control of the Applicant, necessitating the requirement for a new primary entrance to the site off Milltown Road.

As noted above, the existing building range is located in the southern portion of the subject site and ranges in height from 2 No. to 4 No. storeys. The breakdown of each building element is illustrated in Figure 3.3 below and the descriptions of each building have been extracted from Chapter 7 (Architectural Heritage) of the EIAR which has been prepared by Molloy and Associates Conservation Architects. Tabor House and the Chapel will be reused and refurbished as part of the proposed development.



Figure 3.3: Outline of Building Range Which Identifies Each Building Element Existing at the Subject Lands

(Source: Molloy and Associates Conservation Architects – Presented in Chapter 7 of the EIAR, 2025)

Building A - Milltown Park House



Figure 3.4: Front Elevation of Milltown Park House

(Source: Molloy and Associates Conservation Architects, 2025)

The earliest of the buildings is a late-18th century villa, constructed as a residence fronting Milltown Road, but accessed principally from Sandford Road. The original Milltown Park House has been modified beyond recognition in its extension to the south, east and north, with significant alterations internally, which has irreversibly eroded its significance.

The building is not included on the Record of Protected Structure, nor is it included in the National Inventory of Architectural Heritage ('NIAH'). The current architectural composition of Milltown Park House cannot be deemed to uphold design ethics representative of what would comprise an exemplar. The architectural significance of the house has been reduced significantly on account of its many interventions. Its original setting is removed and its new setting is regrettably one of architectural confusion.

Building B - Milltown Park House Extension



Figure 3.5: Images of the Milltown Park Extension

(Source: Molloy and Associates Conservation Architects, 2025)

The design of the rear extension block, as originally constructed, attempted ambitious harmony with the extended Milltown Park House in the creation of an H-block, culminated with the House to the east and a matching wing to the west. The lower central section, which contained the original domestic chapel, subsequently repurposed as a reading room, was extended vertically in 1932 to match the heights of the end blocks.

The taller, early 20th century central portion's southern elevation is modernistic in its treatment, having modulated fenestration expressed up to parapet level. Its simpler northern elevation was of later origin again.

The extension is much modified internally. It comprises a corridor with cellular rooms to the south and either side in its rear wing on all five levels. Its rear wing, culminating its western elevation, expands to form an H-shape corresponding with the form of Milltown Park House, and houses sanitary facilities and stores. The building's original setting to the north, south and west has been dramatically altered in subsequent expansion of accommodation. The interior is absent of decorative detail.

The extension is not included on the Record of Protected Structures, nor is it included in the NIAH. It is maintained that the building is intrinsically connected with its original function as an institution and does not lend itself easily to alteration to another use. As a non-protected structure, adaptive re-use would essentially remove the limited architectural character internally. As a consequence of the permanent removal of function, together with a view that on balance, it does not possess the range of characteristics meriting retention, its demolition is inevitable.

Building E - Finlay Wing



Figure 3.6: Images of the Finlay Wing

(Source: Molloy and Associates Conservation Architects, 2025)

The external character of the Finlay Wing, as existing, comprises its reconstruction following a fire in 1949, whereby a four storey over basement building was altered as a single volume building. Externally, the building is sparse and reflective of the budget-driven economy of mid-20th century. The building is not included on the Record of Protected Structures, nor is it included in the NIAH.

The interior is pleasing, but commonplace. The building is of quality, but not to the extent where it is considered an exemplar. Its reconstruction following a fire as a single storey over basement building is much altered from its original intended design. It is proposed to demolish the Finlay Wing.

Building F - The Archive



Figure 3.7: Images of the Archive

(Source: Molloy and Associates Conservation Architects, 2025)

The archive building has a modest exterior, comprising a simply rendered concrete block building with Art Deco characteristics. Its external composition is representative of wartime Ireland where

materials and labour were in sparse supply. The building's interior reflects its function as an archive. A quadrangle generated by a pressed copperclad structure encircling at three levels an apse ended lantern roof light, comprises book shelving aligned with the structure to create bays each having their own window.

The building does not benefit from any independent external access. Its singular point of entry is internally, via the Milltown Park House Extension (Building B), which involves a series of level changes.

The building is not included on the Record of Protected Structures, nor is it included in the NIAH. The building is introverted and does not connect with its landscape, with its external presence benign within its setting and it is proposed to be demolished.

Building Element C - Tabor House



Figure 3.8: Images of Tabor House

(Source: Molloy and Associates Conservation Architects, 2025)

Tabor House comprises a 4 No. storey building (including lower ground floor level), and possesses a strong exterior of rusticated granite, with sweeping entrance steps centrally positioned to the east. The west elevation is a continuance of the style of the east, with a central

bowed stair bay. The building has a slated pitched roof, timber sash windows and timber panelled doors.

The building is not included on the Record of Protected Structures, nor is it included in the NIAH. The building is a good example of institutional 19th century architecture. The building is typical of its era of construction but is set apart by the quality of its exterior. It is simply detailed internally, with its exterior found to comprise an exemplar of its period. The structure contributes to its parkland setting and enriches the architectural character of the public realm as visible from Milltown Road. Tabor House, whilst clearly institutional in origin, has the benefit of a singularly strong external form, which follows through to a rational internal form. As a consequence, its re-use is possible.

Tabor House will therefore be refurbished in the proposed development and repurposed to provide 1,036 sq m of cultural/community space.

Building Element D - The Chapel Building

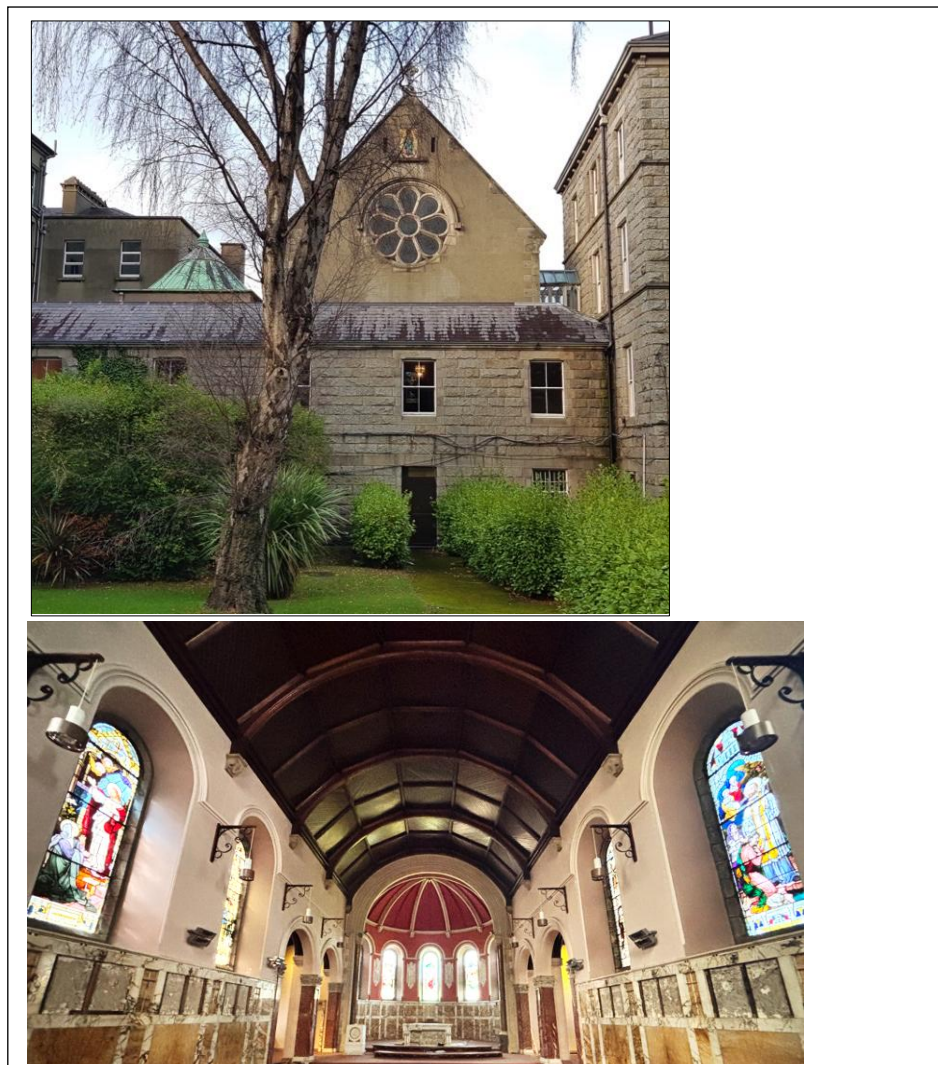


Figure 3.9: Image of the Chapel

(Source: Molloy and Associates Conservation Architects, 2025)

The chapel grouping, comprising a sacristy, vestry and gallery, is an exemplar of its era. Its external form is strong, and legible on the north-west elevation with copper clad bow ends and elegant fenestration. Much of the exterior of the building is largely concealed by taller structures to the east (link building between Tabor House and Milltown Park House); north (Tabor House) and south (Milltown Park House rear extension). Entry level is accessed up a short flight of steps from the corridor of the Milltown Park rear extension block, leading to the link building between Tabor House and Milltown Park House rear extension and it is proposed to construct two new entrances to facilitate access into the former Chapel to improve its connection with the proposed development.

The building is not included on the Record of Protected Structures, nor is it included in the NIAH. The structure contributes to its parkland setting. The building's interior is an exemplar of its era that endures to the present day.

The Chapel was constructed to fit neatly in a tight space between Tabor House and the rear extension to Milltown Park House. However, as a set piece it is found to have formed a viable architectural connection with Tabor House that will have the capacity to endure in the detachment of these forms from the wider grouping.

The Chapel can be purposefully re-used to provide 662 sqm of cultural/community space, whilst retaining its spatial and decorative character and will provide a very characterful space for the future user of the building.

3.3 Site Context

The subject site is located on the junction of the Milltown Road and Sandford Road. This junction also immediately connects to Eglinton Road (R824) and St James Terrace / Clonskeagh Road (R825). This places the subject site at the interface between the urban villages and neighbourhoods of Ranelagh, Milltown, Donnybrook and Clonskeagh. The River Dodder is located to the south-east which is part of the ongoing Dodder Greenway project to provide high-quality walking and cycling facilities along the river, between Dublin City Centre and Glenasmole.

The immediate area beyond the Milltown Park campus is predominantly residential and institutional in nature. The residential units include 2 No. storey houses located adjacent to the western site boundary along Cherryfield Avenue Lower and Cherryfield Avenue Upper and 2/3 No. storey houses in Norwood Park located adjacent to the north-western boundary. In addition, a 6 No. storey apartment development known as Millbrook Court and a 3 No. storey duplex complex known as Mount Sandford are located to the east of the subject site across Milltown Road.

Institutional uses are to the south-west of the subject site and comprise the Milltown Park Community House, Cherryfield Lodge Nursing Home and Gonzaga College. Muckross Park College, Sandford Park School, St. Mary's National School, Sandford Park National School, Gaeolscoil Lios Na nÓg, and Scoil Bhríde is also located to the north of the subject lands. A Circle K Petrol Station is located to the north of the subject lands along Sandford Road. Please see Figure 3.10 for the surrounding context of the subject site.

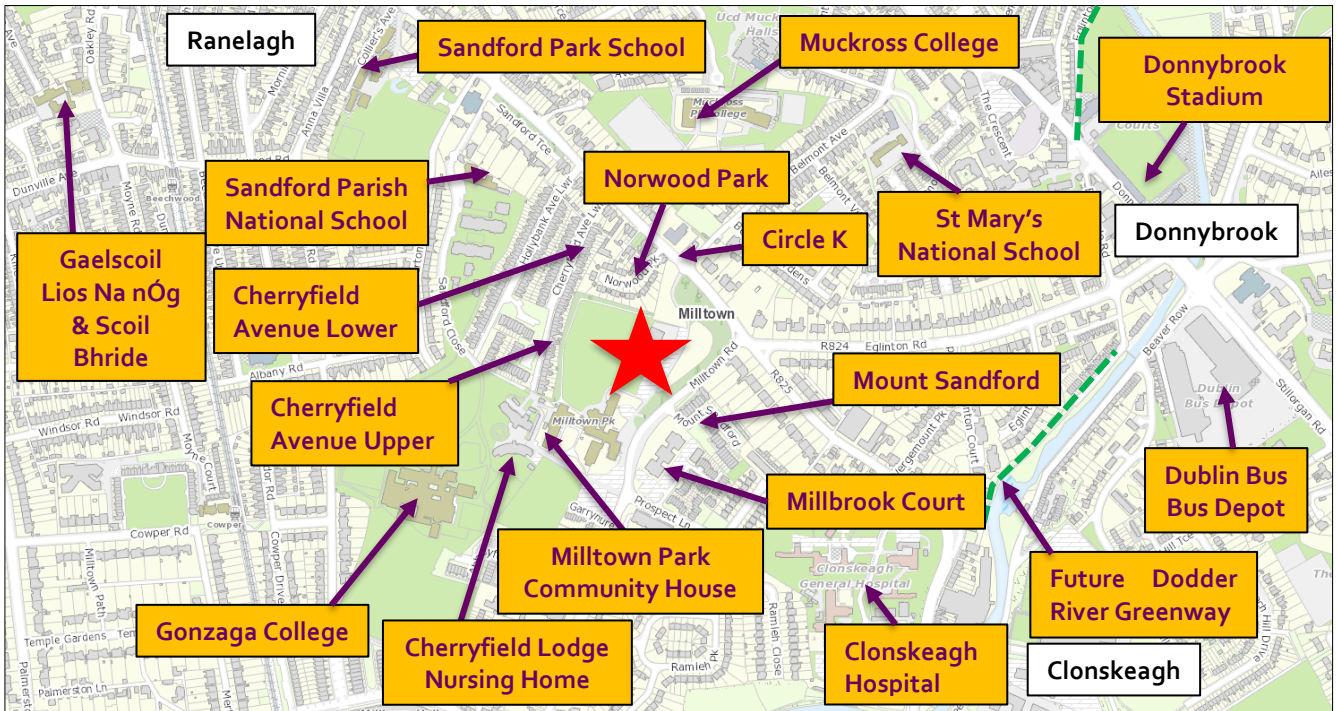


Figure 3.10: Context Surrounding the Subject Site (Highlighted Indicatively by the Red Star)

(Source: www.myplan.ie, annotated by Thornton O'Connor Town Planning, 2025)

3.3.1 Nearby Neighbourhood Centres

There are a number of neighbourhood centres near to the subject site with some forming strong urban villages. The following neighbourhood centres are within walking/cycling distance of the subject site:

- **Milltown-c.450 metres/c.6 minutes walking distance/c.1 minute cycling distance:**

Services/Facilities include: Eurospar, Wilde and Green Café, New Element Fitness Gym, Poise Hair Salon, Daisy Chain Montessori and Childcare, Milltown Dry-Cleaning and Laundry Service, Milltown Total Health Pharmacy, Phelans Pharmacy and the Parish of Columbanus, Saint Gall and Assumption of the Blessed Virgin Mary Church for example;

- **Donnybrook-c.500 metres-c.900 metres/c.6-10 minutes walking distance/c.2-3 minutes cycling distance:**

Services/Facilities include: Donnybrook Fair, Donnybrook Lawn Tennis Club, Tesco Express, McCabes Pharmacy, Boots Pharmacy, Spar Donnybrook, Energia Park (Donnybrook Stadium), Bective Rangers Football Club, Lyk Nu Cleaners, D4 Medical Centre, The Grafton Barber, Donnybrook Dental Practice, Donnybrook Foot Mechanics, Skin by Olga, Di Milo Hair Design, Mink Hand & Foot Spa, Donnybrook Bikes, O'Brien's Off Licence, Fast Fit (Car Repair and Maintenance), First Stop Garage, Donnybrook Parish-Church of the Sacred Heart, Insomnia Café, Happy Out Café, Green Beards Café, Nourish Donnybrook Health Food Store, Marco Pierre White Courtyard Bar and Grill, The Morehampton (pub), Romayo's Donnybrook Fish and Chips, Abrakebabra, Eddie Rockets, Arthur Mayne's Bar and Café Nero for example;

- **Clonskeagh – c.350 metres – 1.3 km /c.6-16 minutes walking distance/c.1-6 minutes cycling distance:**

Services/Facilities include: Cafe 105, Ashtons Gastro Pub, Clonskeagh Hospital, Platinum Pilates and Physiotherapy, David Lloyd Gym, Applegreen, Farmer Browns Pub, Kuma Bikes and Clonskeagh Vets for example;

- **Ranelagh-c.500 metres-1.4 km/c.6-18 minutes walking distance/c.1-5 minutes cycling distance:**

Services/Facilities include: Meagher’s Pharmacy Sandford Road, Meagher’s Pharmacy Ranelagh Village, Scoop Dessert Parlour Ranelagh, Selena’s Beauty Spa, The Village Butcher Shop, The Devlin Cinema, The Devlin Hotel, Tesco Express, Oslo Beauty Ranelagh, Joys Flowers Florist, Anastasia Boutique, Laundry Online Ranelagh, Expert Hardware, Bank of Ireland, Ranelagh Thai Centre Massage Therapist, i-Service Mobile Repairs, BoyleSports Bookmakers, GMALE Barbers, The Company of Books, Headcases Hair Studio, The Zip Yard Sewing Shop, Ranelagh Village Dental, Seagreen Boutique, Leech Pharmacy, Origin Hair Salon, Brown Sugar Hairdresser, Advanced Electrolysis Clinic, Rouge Beauty Salon, Lidl, Health Services Staffs Credit Union, Ranelagh Post Office, Spar, AIB Bank, Burke’s Pharmacy, Flyefit Ranelagh, SuperValu, Wildflower Hair Salon, Ranelagh Park Playground, Ranelagh Seventh-day Adventist Church, Archview Physiotherapy, White Crane Kung Fu and Tai Chi, Mountpleasant Square Park and Mountpleasant Lawn Tennis Club for example;

A large number of café/restaurants/bars are located within Ranelagh including the following:

R McSorleys Bar, Birchalls Bar, Americana Bar, Layla’s Rooftop Restaurant, Nightmarket Thai Restaurant, Bunsen Restaurant, Four Star Pizza, La Bodega Restaurant, Cinnamon Restaurant, Humphrey’s Pub, Smyths of Ranelagh Bar, Er Buchetto Café, Butcher Grill Steak House, Antica Venezia Restaurant, Tribeca Restaurant, Butlers Chocolate Café, Gigi Restaurant, Mario’s Italian Restaurant, Zaytoon Restaurant, The Taphouse Bar, Wowburger Restaurant, Kinara Kitchen Restaurant, Rita’s Restaurant, Mak Chinese Restaurant, Nick’s Coffee and Firebyrd Restaurant for example;

- **Beechwood-c.1 Kilometre/c. 13 minutes walking distance/c.4 minutes cycling distance:**

Services/Facilities include: Mima Coffee Company, Mortons Store, The Best of Italy Store, Excuse my French Restaurant, Keegans Laundrette and Dunville Pharmacy for example.

- **Rathmines-c.1.8-2.2 km/c.22-c.28 minutes walking distance/c.6-c.8 minutes cycling distance:**

Services/Facilities include: The Swan Shopping Centre [which includes Omniplex Cinema Rathmines, McDonald’s Restaurant, Dunnes Stores, Starbucks, Butlers Chocolate Café and Elephant & Castle Restaurant for example] in addition to The Stella Cinema, Eddie Rockets, Kodiak Bar, Lottie’s Restaurant, Rody Bolands Bar, Blackbird Pub, Tesco Metro, Tesco Express, Lidl, Aldi, Saba to Go, Zambrero Rathmines, Umi Falafel, Farmer Browns Restaurant, Camille Thai Restaurant, Uno Pizza, Dominos Pizza, Apache Pizza, Subway, The Orange Tree Bakery, The Laundry and Dry Cleaning Shop, The Cartridge Shop, Doctors Clinic Rathmines, Rafter’s Medical Centre, Rathmines Dental, Peter Marks Hairdressers, Heaven Beauty Salon, Daniel and

Andrew Hair Salon, Rathmines Library, EBS Bank, Rathmines Life Pharmacy, Boots Pharmacy and Rathmines Post Office for example.

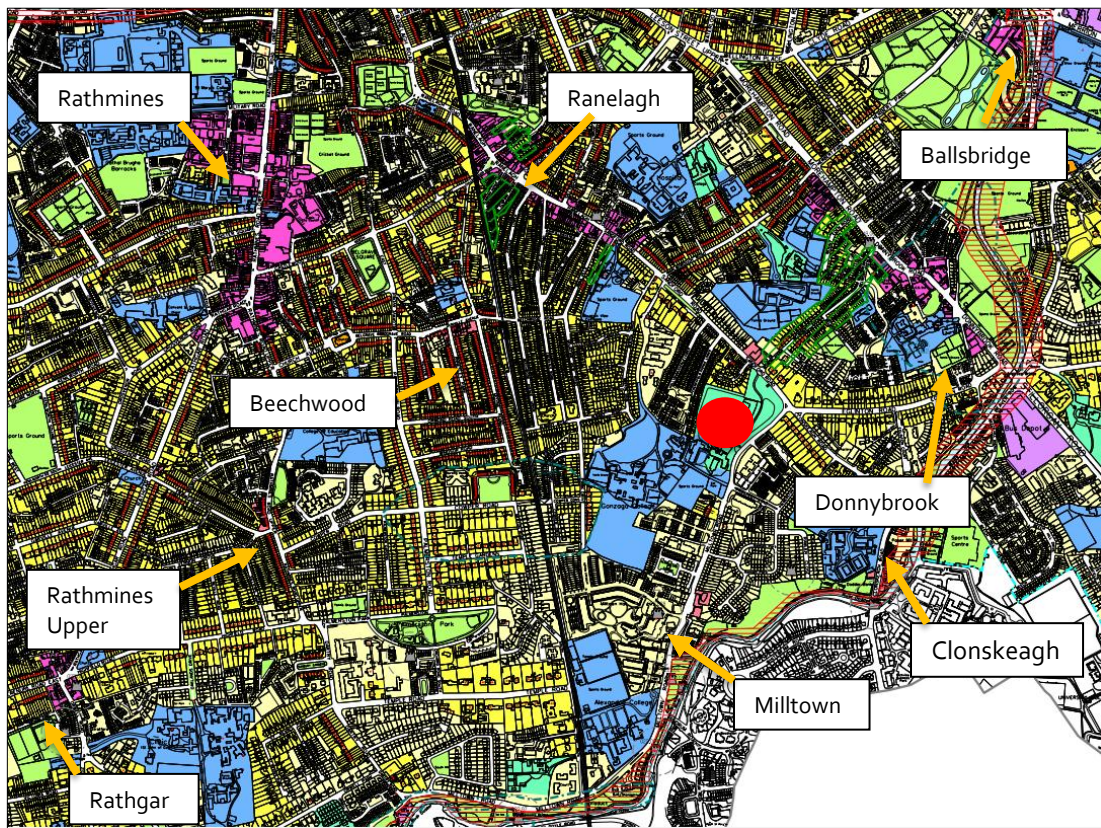


Figure 3.11: Neighbourhood and District Centres in the Surrounding Area (Subject Site annotated by Red Dot)

(Source: *Dublin City Council Development Plan 2022-2028, Map H, Annotated by Thornton O’Connor Town Planning, 2025*)

3.3.2 Social and Community Audit

As set out in Policy QHSN48 of the *Development Plan*, there is a requirement for a Community and Social Audit to be carried out for developments over 50 No. units:

“To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.”

We note that a fully detailed *Community and Social Infrastructure Audit (incl. Schools and Childcare)* has been prepared by Thornton O’Connor Town Planning which notes the following:

“The survey identified a large range of community facilities within the Study Area. A total of 6 No. categories of facilities that align with the Policies set out in the Development Plan were utilised for this Audit. Some 162 No. social infrastructure facilities were identified as part of this Audit within a radius of 1 km of the subject site.

Therefore, it is considered appropriate to provide a residential led mixed-use development at the subject site. The *Community and Social Infrastructure Audit (incl. Schools and Childcare)* remarks the following in relation to childcare:

"the analysis of existing capacity indicates a robust demand for additional childcare places. Given the childcare demand generated by the proposed development, its unit typology, alongside the shifting age and demand profile, it is considered that an additional childcare facility would be a favourable addition to the area."

Accordingly, the Applicant has incorporated a crèche into the scheme, which will benefit the future residents of the development, but will also cater for the immediate existing residents of the area and thus will greatly enhance the amenity of the area.

In addition, the final layout of the community/cultural spaces will ultimately be agreed through compliance with Dublin City Council, as identifying occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process; any identified end user at this juncture may no longer need the space once planning has been secured and construction completed.

3.4 Accessibility

3.4.1 Introduction

The subject site is located on a main arterial road (R 117) from the southern suburbs into the Dublin City Centre. The N11 National Road can also be easily accessed via Eglinton Road and further onto the Stillorgan Road (R 138).

The site is well served by public transport with a range of Luas stops and Dublin Bus stops within walking distance of the site. The site is also located in proximity to various locations such as the City Centre, Donnybrook, Ranelagh, Clonskeagh and Ballsbridge. This range of accessibility by public transport, cycling and by foot allows access to local level services, nearby employers and the City Centre. We note that proximate bus stops will be discussed in Section 3.4.3.

3.4.2 Luas Light Rail

The subject site is located in close proximity to the following Green Line Luas stops:

- Beechwood: c. 720 metres as the crow flies (1 Km walk/ c. 13 minute walk)
- Cowper: c. 740 metres as the crow flies (c. 1.3 Km walk/ c. 17 minute walk)
- Milltown: c. 918 metres as the crow flies (c. 1.3 Km walk/ c. 17 minute walk)
- Ranelagh: c. 1.1 Km as the crow flies (c. 1.1 Km walk/ c. 14 minute walk)

The Green Line Luas allows easy access to a significant quantum of employment locations throughout the City Centre, North and South Dublin City, North and South of Dublin County in addition to the opportunity for users to change onto the Red Line Luas at O'Connell Street/Abbey Street which would provide access to employment locations to the east and west of the City Centre.

The MetroLink service is proposed to operate from north of Swords to the Charlemont Luas stop. The proposed MetroLink service, as a segregated and mostly underground / sub-surface system,

will be a fully automatic service which will greatly improve frequencies across the wider network and provide new improved connection to the City Centre, the Airport and Dublin's rail network. The Railway Order for the MetroLink was approved by An Coimisiún Pleanála in September 2025.

3.4.3 Bus Services

When assessing how accessible a site is in terms of its proximity to a 'high-quality bus service', it is considered more appropriate to evaluate the combined frequency and range of destinations provided by all bus routes serving a single bus stop rather than assessing each individual bus route in isolation.

For example, when considered on its own, a single bus route might operate only every 40 minutes at a particular bus stop, which may not be considered as high frequency and/or may offer limited travel opportunities for passengers. However, where multiple bus routes serve the same bus stop and are considered collectively, a much higher frequency and access to a broader range of destinations is experienced by that single bus stop. Given this approach offers a more accurate indication of the quality of bus services available for future development at a given site, a single bus stop served by multiple routes can reasonably be regarded as providing a 'high-quality bus service'.

In this regard, the high-quality bus services in proximity to the subject site includes bus stop Nos. 855, 884, 775, 758, 773, 772 & 760. Of note, bus stop Nos. 855 & 884 are located directly outside the subject site along Sandford Road.

Bus stop Nos. 2899, 2815, 851 & 903 are also noted as being in proximity to the subject site. While these bus stops may not necessarily be considered as high frequency stops, stop Nos. 851 & 903 provides a bus route (No. S2) not offered by any other stop and stop Nos. 2899 & 2815 are conveniently located directly outside and adjacent to the subject site along Milltown Road. Therefore, we consider these bus stops to still contribute to the accessibility of the subject site.

We also note that more bus stops are located within 1-km / 14-minute walk of the subject site, however, we have not identified these as they facilitate the same bus routes of the abovementioned bus stops which are located closer to the subject site.

The location of these bus stops to the subject site is illustrated in Figure 3.12 and details of them are presented in Table 3.1.

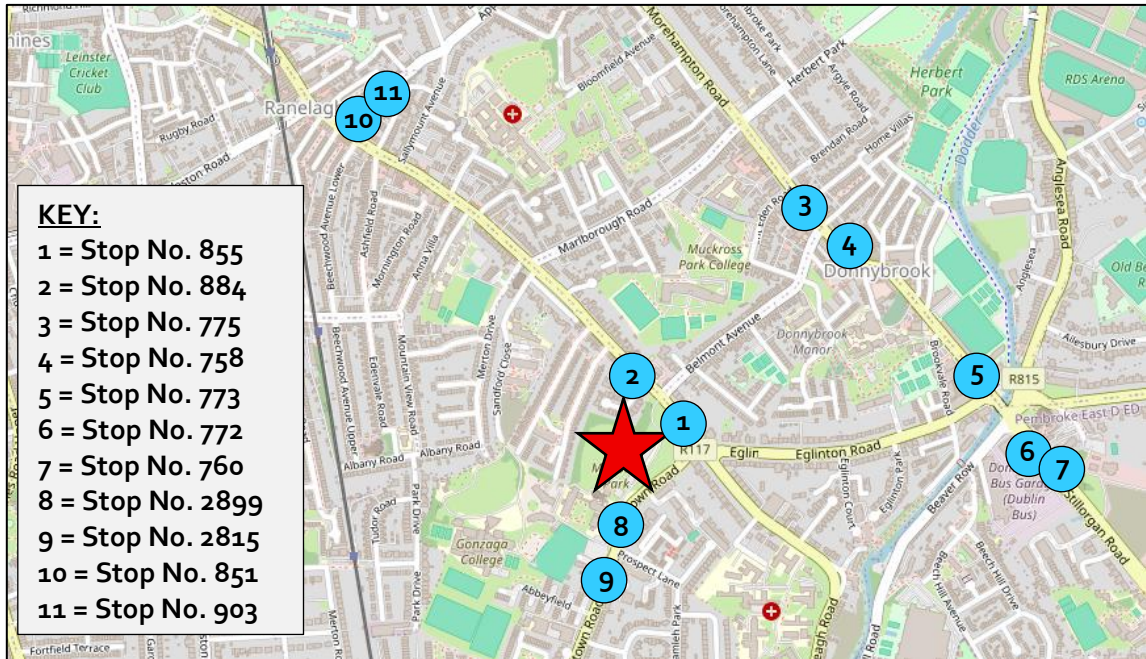


Figure 3.12: Location of Nearby Bus Stops in Proximity to the Subject Site (Indicative Location Indicated by a Red Star)

(Source: www.openstreetmap.org, Annotated by Thornton O'Connor Town Planning, 2025)

Map No.	Bus Stop No.	Distance from Subject Site	Bus Route Nos.	Destinations Offered by Bus Routes	Peak Hour Weekday Frequency Range ¹⁰	Peak Hour Saturday Frequency Range ¹¹
1	855	c. 20-metres less than a minute's walk	11, 44, 44D	Enniskerry, Kilternan, Sandyford Business District, & Dundrum	Every 10 – 20 minutes	Every 15 – 30 minutes
2	884	c. 20-metres less than a minute's walk	11, 44, 44D	O'Connell Street, Drumcondra Rail Station, DCU & Phoenix Park	Every 5 – 25 minutes	Every 30 minutes
3	775	c. 600-metres c. 8-minute walk	7B, 7D, 11B, 39A, 41X, 116, 118, E1, E2, X1, X2, X25, X27, X28, X30, X31, X32	Mountjoy Square, Phoenix Park, Ongar, Blanchardstown, O'Connell Street, Dawson Street, Leeson Street, DCU, Maynooth, Leixlip, Celbridge, & Lucan Village	Every 1 – 7 minutes	Every 1 – 10 minutes
4	758	c. 550-metres c. 8-minute walk	7B, 7D, 11B, 39A, 41X, 46n, 77X, 116, E1, E2, X1, X2, X25, X26, X27, X28, X30, X31, X32	UCD, Dundrum, Sandyford Business District, Stillorgan, Bray, Dún Laoghaire, Greystones & Shankill	Every 1 – 10 minutes	Every 1 – 11 minutes
5	773	c. 700-metres c. 10-minute walk	7B, 7D, 11B, 32X, 39A, 41X, 46n, 77X, 116, E1, E2, X1, X2, X25, X26, X27, X28, X30, X31, X32, 181 & 700 (Aircoach)	Malahide, Portmarnock, Connolly Station, Mountjoy Square, Phoenix Park, Ongar, Blanchardstown, O'Connell Street, Dawson Street, Leeson Street, DCU, Maynooth, Leixlip, Celbridge, Lucan Village & Dublin Airport	Every 1 – 7 minutes	Every 1 – 10 minutes
6	772	c. 800-metres c. 11-minute walk	7B, 7E, 7D, 39A, 41X, 116, 118, 133, E1, E2, X1, X2, X25, X27, X28, X30, X31, X32	Mountjoy Square, Ongar, O'Connell Street, Dawson Street, Leeson Street, DCU, Maynooth, Leixlip, Celbridge, & Lucan Village	Every 1 – 7 minutes	Every 1 – 10 minutes
7	760	c. 800-metres c. 11-minute walk	7B, 7D, 32X, 39A, 41X, 46n, 77X, 116, 133, E1, E2, X1, X2,	UCD, Dundrum, Sandyford Business District, Stillorgan, Bray, Newcastle,	Every 1 – 8 minutes	Every 1 – 12 minutes

¹⁰ We have taken the peak weekday frequency for all bus routes mentioned throughout this Report to be between 07:00–09:00 & 16:00–18:00, Monday to Friday.

¹¹ We have taken the peak Saturday frequency for all bus routes mentioned throughout this Report to be between 08:00–10:00 & 17:00–19:00.

			X25, X26, X27, X28, X30, X31, X32, 120a, 181	Wicklow Town, Glendalough, Dún Laoghaire & Greystones		
8	2899	c. 150-metres c. 2-minute walk	44 & 44D	O’Connell Street, Drumcondra Rail Station & DCU	Every hour	Every hour
9	2815	c. 300-metres c. 3-minute walk	44 & 44D	Enniskerry, Kilternan, & Dundrum	Every hour	Every hour
10	851	c. 1,000-metres c. 13-minute walk	11, S2	Phoenix Park, Heuston Station, St. Jame’s Hospital, Crumlin, Enniskerry, Kilternan, Sandyford Business District, & Dundrum	Every 5–15 minutes	Every 5–15 minutes
11	903	c. 1,000-metres c. 14-minute walk	11, S2	Leeson Street, Dawson Street, O’Connell Street, Ballsbridge, Poolbeg & Phoenix Park	Every 5 – 30 minutes	Every 10–15 minutes

Table 3.1: Details of Bus Stops Proximate to the Subject Site

(Source: Details Obtained Using Google Maps, www.dublinbus.ie, www.goaheadireland.ie, and www.transportforireland.ie, Table Generated by Thornton O’Connor Town Planning, 2025)

There are also several future bus routes that will be delivered in proximity to the subject site under the BusConnects programme. Although it is not yet known what stops will facilitate these bus routes, it is likely that they will operate at existing bus stops along the identified route, further increasing the frequency of bus stops.

As illustrated in Figure 3.13, the No. 86, 87 & 88 'Radial' bus routes will operate along Sandford Road. The No. 86 will provide a half-hourly weekday service and half-hourly and hourly weekend service between Ticknock, Goatstown and Mountjoy Square. The No. 87 will provide an hourly weekday and Saturday service between Belarmine, Dundrum, Mountjoy Square. The No. 88 will provide an hourly weekday and weekend service between Enniskerry, Belarmine, Dundrum and Mountjoy Square.

As noted in Table 3.1 above, the E1, E2 & S2 bus routes are already operational in proximity to the subject site.

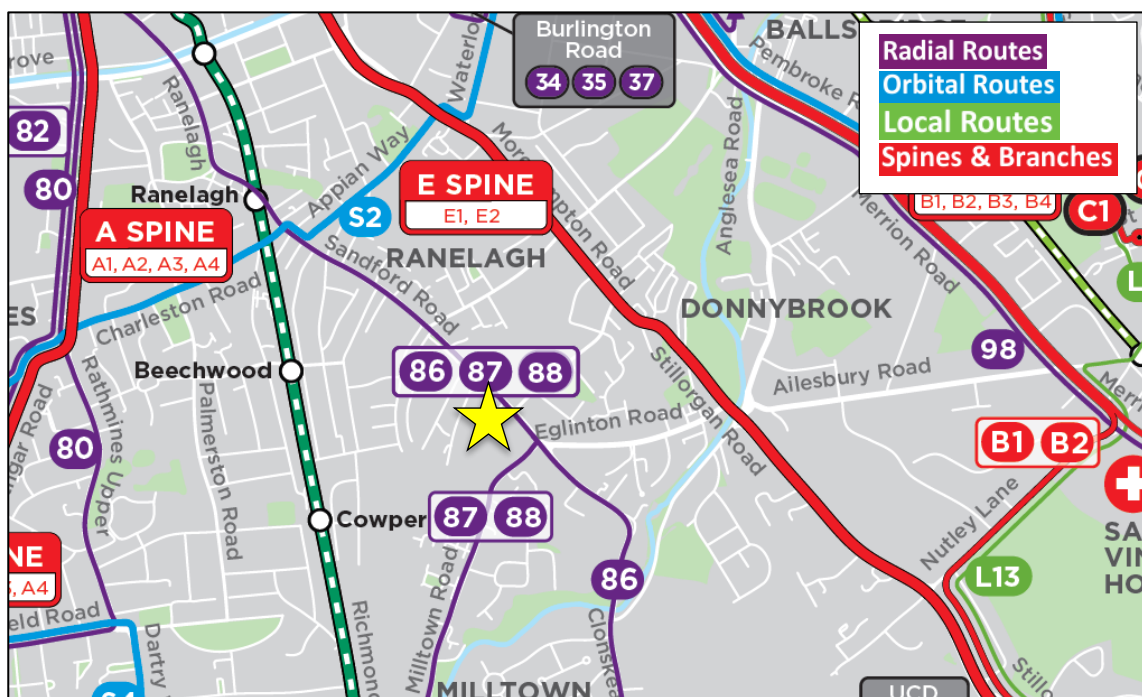


Figure 3.13: BusConnects Future Bus Routes in Proximity to the Subject Site (Indicative Location Indicated by a Yellow Star)

(Source: www.busconnects.ie, Annotated by Thornton O'Connor Town Planning, 2025)

In addition to the future bus routes along Sandford Road, the nearby Donnybrook Road and Stillorgan Road to the east of the site are part of the Bray to City Centre Core Bus Corridor which is one of twelve Core Bus Corridor's to be delivered under the BusConnects programme. These Core Bus Corridor's will improve and enhance the bus, cycle and walking infrastructure within and surrounding Dublin City Centre and according to the BusConnects website¹², all twelve Core Bus Corridors are anticipated to be complete by 2030.

¹² <https://busconnects.ie/nta-awards-contract-to-gmc-for-the-delivery-of-the-first-busconnects-core-bus-corridor-scheme/>

The Bray to City Centre Core Bus Corridor scheme was approved by An Coimisiún Pleanála in January 2025 under the Case Ref. HA27.317742. The subject site will inevitably benefit from the numerous bus, cycle and walking infrastructure improvements to be delivered by the Bray to City Centre Core Bus Corridor, particularly the improved cycle lanes.

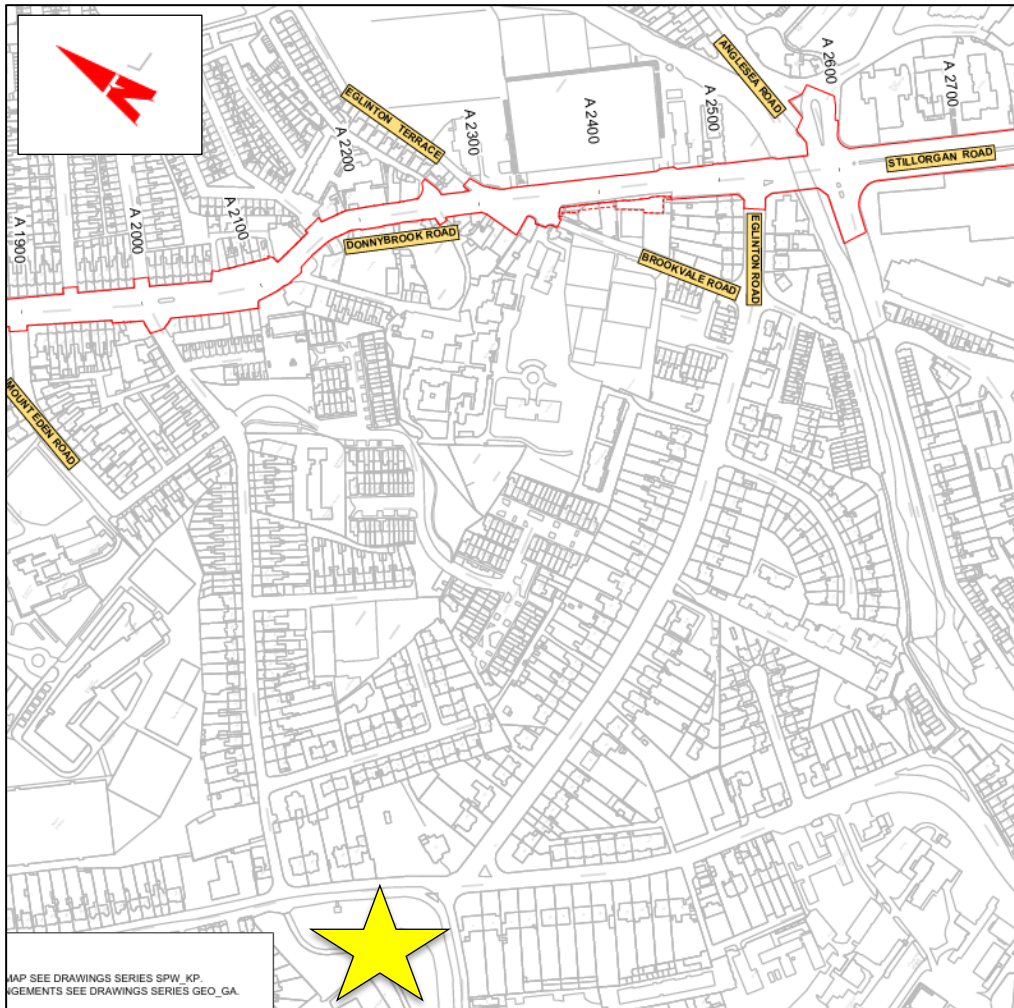


Figure 3.14: Location of the Subject Site (Indicated by a Yellow Star) in Relation to the Bray to City Centre Core Bus Corridor Scheme (Outlined in Red)

(Source: Drawing No. 'BCIDB-JAC- SPW_ZZ-0013_XX_00 -DR-CR-0002' by Jacobs, Submitted with the Application for the Bray to City Centre Core Bus Corridor, Annotated by Thornton O'Connor Town Planning, 2025)

3.4.4 Bicycle Infrastructure

There is a long-term strategy for the cycle network of Dublin City which is based on existing infrastructure and new planned connections such as greenways and segregated paths. Under the *National Transport Authority's (NTA) Greater Dublin Area Cycle Network (2022)*, adopted as part of the *Greater Dublin Area Transport Strategy 2022-2042*, there is a plan for a network of cycling infrastructure across the City.

The subject site is located within the "Dublin South CENTRAL" as outlined within the GDA Cycle Network Plan whereby this area "extends outward from the city centre through Ranelagh and fans out to include the areas of Clonskeagh, Milltown, Goatstown, Dundrum, Ballinteer, Sandyford and

Stepaside". The Network Plan includes the following key cycle routes in proximity to the subject site:

- Primary Route:** This will directly serve the subject site which will run along Sandford Road. Travelling Northwest bound, the primary route will connect the subject site to Dublin City Centre via Ranelagh. Whereas travelling south bound it will connect the site to Clonskeagh. This scheme will include segregated cycle facilities along the Sandford Road as well as enhanced pedestrian crossing facilities at junctions along the route such as the Eglington Road/Sandford Road/Clonskeagh Road/Milltown Road junction as well as an upgrade to the existing site access junction on Sandford Road incorporating Belmont Avenue. It is anticipated that this scheme will begin construction in 2026.
- Orbital Route:** From Rathgar and Dartry to Milltown, Clonskeagh and Ballsbridge, mostly along the proposed Dodder Valley Greenway. This route links to UCD at Clonskeagh. There is a connection from Tallaght via Route 9A at Oldbridge Road in Templeogue. The greenway is currently under construction in a number of phases by South Dublin and Dublin City Council. The section of the greenway located to the south-east of the proposed development is anticipated to begin construction in 2026.
- Secondary Route:** This will directly serve the subject site. It will run from Sandford Road along Milltown Road and Lower Churchtown Road and will connect the subject site to Churchtown and Dundrum.

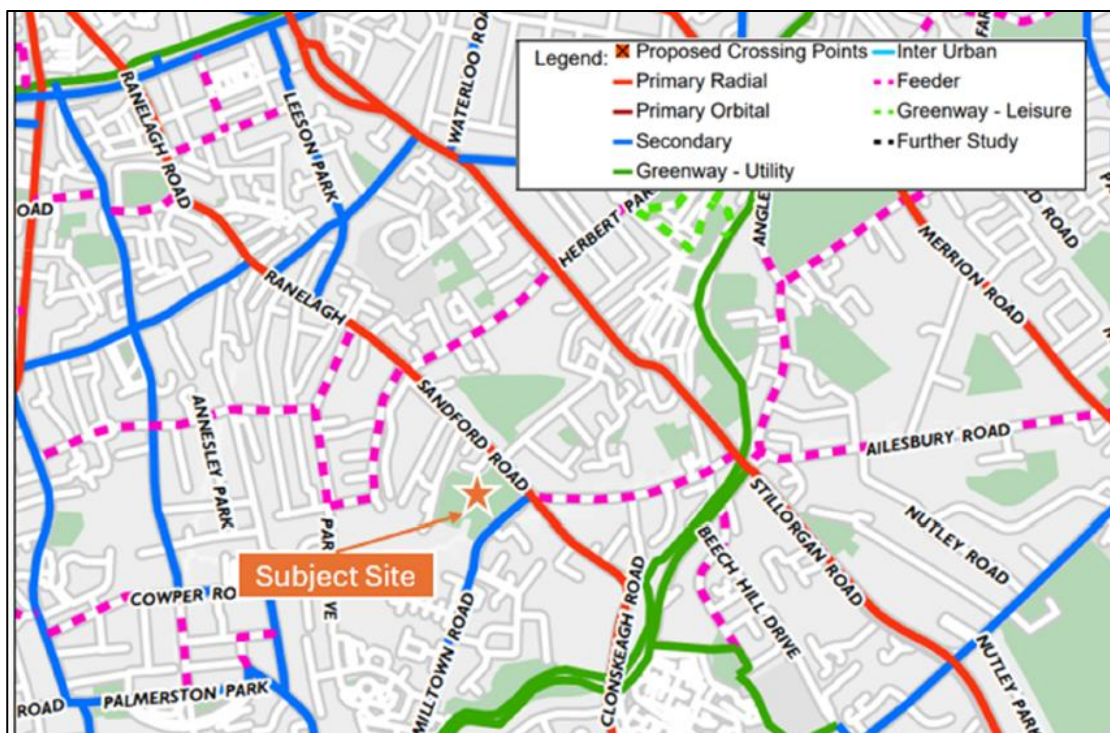


Figure 3.15: Proposed Cycle Network Surrounding the Subject Site

(Source: *National Transport Authority's (NTA) Greater Dublin Area Cycle Network (2022), annotated by DBFL Consulting Engineers, 2025*)

Recent upgrade works were carried out in Ranelagh to segregate the existing cycle path from any vehicular traffic and parking through the placement of bollards. Although some of this path

further north of Ranelagh is with traffic and shares its route with local bus services, it is a near continuous path to the Canal Ring/ City Centre.

Dodder Greenway

The Dodder Greenway is an ongoing active travel scheme being delivered by Dublin City Council, Dún Laoghaire–Rathdown County Council and South Dublin County Council and is funded by the National Transport Authority. Once complete, it will link the City Centre to the Bohernabreena reservoir in South Dublin by providing a blend of off-road and on-road pathways. Numerous phases of the scheme have already been delivered and are now operational.

The closest point of the Greenway to the subject site will be located only c. 650-metres / 9-minute walk / 2-minute cycle south of the subject site along Milltown Road and will be delivered as part of the Milltown Road to Dundrum Road section of the Greenway. This 1-km long section will be delivered as an on-road pathway and will provide a continuous cycle and pedestrian route along the Dodder, between the junction of Milltown Road and Dundrum Road and the junction of Milltown Road and the Dodder Walk. According to Dublin City Council's website¹³, the Milltown Road to Dundrum Road section is currently in the detailed design and procurement phase with the construction phase anticipated to begin in Q2 2026.

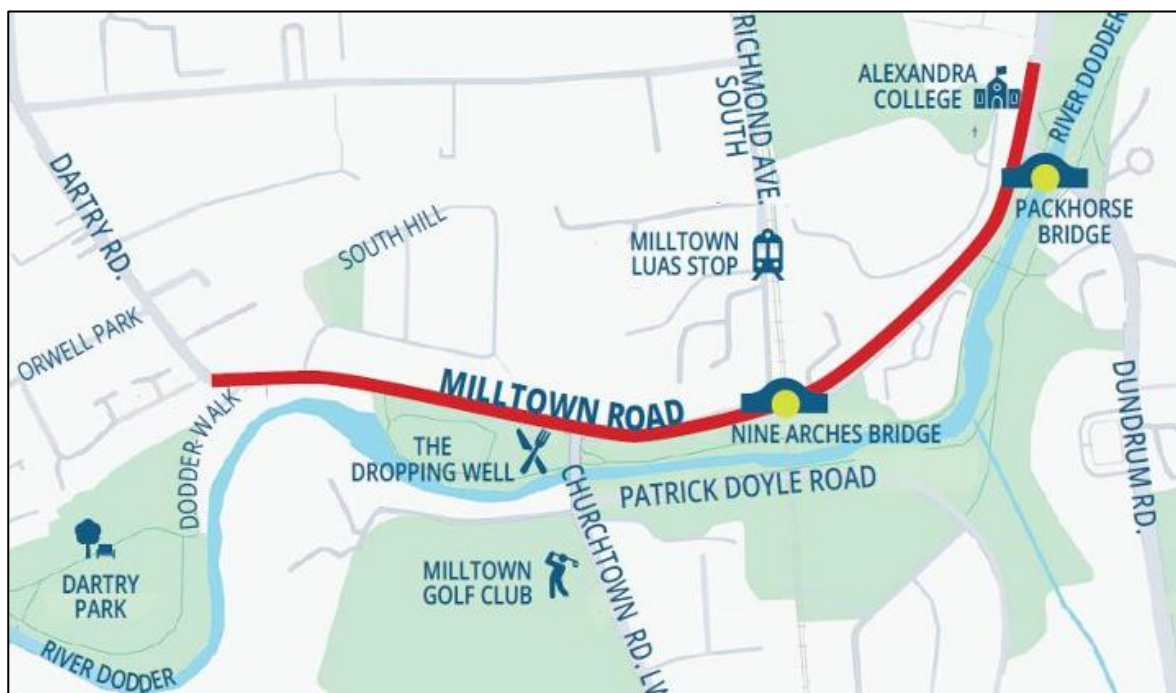


Figure 3.16: Milltown Road to Dundrum Road Section of the Dodder Greenway

(Source: *Dublin City Active Travel Network Report on Non – Statutory Consultation Milltown Road- Dodder Walk to Dundrum Road (Dodder Greenway Route)* by Dublin City Council, 2025)

¹³ <https://www.dublincity.ie/travel-and-transport/active-travel/active-travel-schemes/south-east-area/dodder-greenway/dodder-greenway-milltown-road-dundrum-road>



Figure 3.17: Course of the River Dodder Shared by DCC and DLRCC in Proximity to the Subject Site

(Source: Irish Times, May 2019, Annotated by Thornton O'Connor Town Planning, 2025)

3.4.5 A Large Variety of Business Districts and Employment Locations Can be Easily Accessed by Public Transport and Many Are Also Within Easy Cycling and Walking Distance of the Subject Site

This section will set out the wide range of business districts and employment locations which can be easily accessed from the subject site either by public transport, cycling or walking.

The Grand Canal area, including Harcourt Street, contains a significant volume of employers such as Zendesk EMEA Headquarters, Amazon Ireland, Sky Ireland, CBRE, Designbank MBD, LinkedIn, Azets, and Marsh McLennan, which are easily accessible by the Green Line Luas and bus route Nos. 11, 39A, 44 E1, E2 or S2 which serve many of the nearby bus stops mentioned in Table 3.1 above. We note that the Canal Ring is located within a reasonable walking distance from the subject lands (c. 7 No. minute cycling distance and c. 25 No. minute walking distance).

The Docklands contains significant employers such as Google, PWC, Three Ireland, Indeed Capital, the 3Arena, the Bord Gáis Energy Theatre and the Central Bank of Ireland. Although there are no direct public transport routes available between the subject site and the Docklands, the Green Line Luas and numerous bus routes serving nearby bus stops provides access to the City Centre where additional forms of public transportation options are available to continue on towards the Docklands. The Docklands are also located c. 14-21 No. minutes cycle distance from the subject site.

The nearby Belfield Office Park, Richview Office Park, and Beech Hill Office Campus in Clonskeagh comprises employers such as Environmental Protection Agency (EPA), AIB, Circle K Head Office, Luma Vision, O'Leary Insurance Group, Mars Capital, Pinergy, Rugby Players Ireland, KSN Construction Consultants and Project Managers and National Shared Services

Office (formally PeoplePoint). The Clonskeagh office parks can be accessed by the No. 11 bus or by bicycle or walking (c. 4 No. minutes cycling distance and 13 No. minutes walking distance).

Ballsbridge, which contains the RDS, Meta Head Office, Zurich Insurance, Harvest Financial Services, Coimisiún Na Meán (Media Commission), Irish Research Council, Eirgrid, IBM, Workplace Relations Commission, and in addition to many embassies, hotels, bars and restaurants, is located c. 8 No. minutes cycle distance and c. 20 – 24 No. minutes walking distance from the subject site.

The No. 11, 44 & 116 bus routes and Green Line Luas provide easy access to the Sandyford Business District (c. 23 – 29 minute cycle distance) which contains several large-scale employers such as Microsoft, Mastercard, Vodafone Ireland, SSE Airtricity, and the Beacon Private Hospital.

The neighbourhood and district centres in proximity to the site such as Ranelagh, Donnybrook and Rathmines also contain employers such as local convenience and comparison shops, restaurants and bars and in particular the Swan Shopping Centre (c. 6 No. minutes cycling distance and c. 22 No. minutes walking distance) and Central Statistics Office (c. 8 No. minutes cycling distance and c. 25 minutes walking distance) in Rathmines and the RTE studios in Donnybrook (accessed via the No. 7d, 39a, 116 E1 & E2 bus routes or c. 6 No. minutes cycling distance or 17 No. minutes walking distance).

There are 4 No. hospitals in close proximity to the subject site which are listed below:

Hospitals		
No.	Name	Distance
1	Clonskeagh Hospital	→ c. 450 metres → c. 3 No. minutes cycling distance → c. 6 No. minutes walking distance
2	The Royal Hospital Donnybrook	→ c. 1.4 km → c. 5 No. minutes cycling distance → c. 17 No. minutes walking distance
3	St Vincent’s Hospital	→ c. 2.3 km → c. 7 No. minutes cycling distance → c. 26 No. minutes walking distance
4	St Luke’s Hospital	→ c. 2.9 km → c. 10 No. minutes cycling distance → c. 37 No. minutes walking distance

Table 3.2: List of Hospital’s Located in Proximity to the Subject Site

(Source: Thornton O’Connor Town Planning, 2025)

In addition, the nearby University College Dublin is one of the largest Universities in the state, with c. 39,522 students attending and c. 4,259 No. teaching and support staff within the overall college¹⁴. The UCD Belfield campus spans an area of 133 No. hectares and a number of bus routes pass on either side of the campus. The No. 11 bus route can be utilised from the subject site to easily access the UCD campus. UCD is also located c. 7 No. minutes cycling distance and c. 21 minutes walking distance from the subject site.

¹⁴ <https://www.ucd.ie/about-ucd/about/ucdbynumbers/>

We also note that the Aircoach runs close to the site at bus stops Nos. 773 and 759, located c. 700-750 No. metres/c. 9 No. minute walk from the site. The Aircoach is an excellent service in close proximity to the subject site to allow residents to easily access Dublin Airport. In addition, the City Centre, Stillorgan Village and Sandyford Luas can be accessed by this Aircoach service.

In summary, the subject site is exceptionally well located between a number of important neighbourhood centres at a key cross roads in the inner southern suburbs of Dublin City. The Green Line Luas and numerous bus routes facilitated by nearby stops also affords the opportunity for residents to access employment locations throughout Dublin. The surrounding bus coverage features a number of high-frequency routes into the City Centre and to the Docklands, Ballsbridge and the Sandyford Business District for example. Additional connectivity through the surrounding area is provided by local link roads, numerous trails and walks along the River Dodder, and the future Dodder Greenway.

3.5 Summary

There are a wide range of services, facilities and amenities in close proximity to the subject site, particularly due to the position of the site at the junction of Sandford Road and Milltown Road which acts as a key arterial route between the southern suburbs and Dublin City Centre and as a result is positioned at the centre of many Neighbourhood and District Centres such as Milltown, Donnybrook, Ranelagh, Clonskeagh and Rathmines. The wide range of services, facilities and amenities easily accessible from the subject site include shops, sports and leisure clubs, bars, restaurants, cafes, schools, hairdressers, hospitals, medical centres, doctors, dentists, and parks for example. Therefore, it is clear that the site is well serviced and is suitably located to provide the proposed development.

Having regard to the sustainable location of the site by virtue of its accessibility by walking, cycling and proximity to excellent public transport links which provides easy access to significant employment locations and business districts, it is considered that the subject site is eminently suitable for the proposed development.

4.0 PLANNING HISTORY

4.1.1 Sandford Road SHD (ACP Ref. ABP-311302-21, new Ref. TA29S.322160)

A Strategic Housing Development was previously permitted by An Coimisiún Pleanála on the subject site for 667³⁵ No. dwellings ranging in height from part 2 No. to 10 No. storeys (ACP Reg. Ref. ABP-311302-21). The previous scheme also included the provision of a creche in addition to communal internal amenity and facilities provided throughout the residential blocks, Tabor House and the converted Chapel building. The decision of An Coimisiún Pleanála to Grant Permission was set aside and has now been remitted back to An Coimisiún Pleanála for consideration under Ref. No. TA29S.322160. We note that the website for this remitted application is live and all associated documents are available on www.sandfordplanning.ie.

4.1.1.1 Key Comments Made by An Coimisiún Pleanála in the Inspector's Report

Please see below key comments made by An Coimisiún Pleanála in the Inspector's Report. This positive commentary demonstrates the appropriateness of the development at the subject lands.

Principle of Development

"I am of the opinion that the subject development provides for the delivery of 671 units underpinning the development of a compact city, with good public transport options and with amenities and quality of life facilities associated with this urban area. The subject proposal is such a case where an institutional use for lands cannot be found by the previous owners and where the development of higher density residential development is entirely appropriate."

Daylight Impacts

"In this instance I can see that those quantifiable results in terms of VSC (daylight) are acceptable and this is because the overall site layout has been designed to step down or provide significant separation distances between proposed and existing property. This has been achieved and acceptable levels of daylight to existing properties is the result."

The form, massing and height of the taller elements have been designed to provide adequate levels of daylight and sunlight for future occupants and the design has been sensitively arranged to provide adequate levels of sunlight/daylight to existing neighbouring properties."

Building Height

"The height and massing of the development proposed has been specifically designed to sit in a parkland setting in order to absorb the scale of the buildings. A ten storey landmark building has been proposed at a key urban junction and this is appropriate, given the separation distances involved to adjacent buildings listed on the RPS, I am satisfied that a genuine attempt has been made to respect the surroundings."

"...the height strategy proposed at the margins of the site has been designed to protect and arguably improve wider residential amenity through the provision of new and publicly accessible urban spaces. The site is flat and more or less level with no challenging topography to deal with, but buildings have been graduated in height to meet residential development to the north and west. The

³⁵ Reduced from 671 No. units via condition.

proposed development will 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 nearby development."

"This site is just such a case where, subject to performance criteria, taller buildings should be considered. I consider the proposed development in terms of height is in accordance with national policy as set out in the National Planning Framework, specifically NPO 13 and NPO 35. The proposed development is furthermore in compliance with the Urban Development and Building Height Guidelines in particular SPPR 3, which references section 3.2 Development Management Criteria."

Historical Context of the Site

"In terms of the historical context of the site and the studies prepared to illustrate what buildings offer viable re-purposing, I am satisfied that the best and most feasible buildings are retained and re-used, Tabor House and Chapel. Having visited the site and inspected the various buildings I come to the same conclusion as the applicant, and that is, for the most part the existing buildings have been adapted over time and ABP-311302-21 Inspector's Report Page 97 of 161 serve a singular purpose difficult to reconfigure. As an example, the Archive Building is an interesting and very specialised building but difficult to successfully repurpose. I am satisfied that the historical importance of the site has been well recorded and integrated into the finished design proposal."

Benefits to the Townscape

"The proposed scheme is a development process that will completely change how these lands have operated and were visually presented in the past. Many trees will be removed, and new buildings erected, however, I am confident that the scale and design of the development will be an overall benefit to the townscape of the area."

Overall Assessment

"In my overall assessment of the proposed scheme, I find that it succeeds in providing a step up of 3 and 6 -storey development which integrates well into the existing and historical neighbourhood and where taller buildings are proposed, full use is made of the existing parkland setting."

The applicant has proposed a design and layout that responds well to the particulars of the site and to what recent national planning guidelines seek in terms of residential development. I find that here will be no adverse impacts in terms of overlooking and loss of privacy and this is due to the separation distances involved and the urban context of the site. Neither does overbearing impact become a concern because along the site's northern and eastern boundary development has been designed to respect in terms of design or separation distances, that of existing property. Contextual elevations submitted with the application illustrate these points."

"In overall terms, I am satisfied that the layout, scale and massing of the proposed development will be successfully integrated into the receiving environment. The proposed development will be a beneficial urban marker for the area and contribute significantly to the next phase of urban expansion at this place."

Given the information presented to me by the applicant, the planning authority, statutory consultees and taking into account the many observations made by local residents, I am satisfied that the combination of retained buildings, the effective use of a parkland landscape and the scale

and massing of apartment buildings have all been successfully married to provide an attractive, accessible and efficient new urban quarter.”

4.1.1.2 Key Conditions Attached by An Coimisiún Pleanála

In the SHD application, permission was originally granted subject to 34 No. relatively standard conditions with only Condition No. 2 slightly amending the scheme as lodged.

Condition No. 2 stated the following:

2. Prior to the commencement of development, the following details shall be submitted to, and agreed in writing with the planning authority:

- (a) The omission of the standalone duplex apartment block that comprises four units at the southern section of Block E (units BE.0001, BE.0002, BE.0201 and BE.0101) and their replacement with open space or for a use to be determined by a future planning application.
- (b) The omission of the Bin and Bike Store buildings located to the north and south of Block E (two structures in total) and the relocation of these facilities to the basement level of Block B and C. The space vacated by the Bin and Bike Store buildings shall be replaced with open space.
- (c) Units BE.G206 and BE.0113 shall be reconfigured to address and face across the new area of open space to the north of Block E as a consequence of (b) above. This will require internal modifications and a revised fenestration to the northern elevation.

Reason: In the interests of the residential amenity of existing and future occupants of the scheme.

4.1.1.2 Sandford Road LRD 1 (DCC Reg. Ref. LRD6026/23-S3 / ACP Ref. ABP-317921-23)

The items specified in Condition No. 2 of the SHD were all designed into a new planning application under a Large-Scale Residential Development (referred to herein as 'LRD 1'), with the following implications:

1. Block E reduced from 28 No. units to 24 No. units. An attractive landscaped area replaced the previously located 4 No. units. Whilst 671 No. units were applied for the SHD, this Condition resulted in some 667 No. units being granted. The LRD 1 scheme proposed 636 No. units, with the reduction in the number of units principally arising from the change of Tabor House from 24 No. apartments to cultural/community space and modifications required to change units from Build-to-Rent to Build-to-Sell.
2. As per Condition 2(b) the bin and bike stores proposed beside Block E in the SHD application were relocated to the basement of Blocks B and C in the LRD 1 scheme.

3. As per Condition 2(c), Units BE.G206 and BE.0113 were reconfigured to address and face the new area of open space to the north of Block E in the LRD 1 scheme.

Block E has now changed again in the proposed LRD 2, replacing the 24 No. duplex blocks with 6 No. courtyard houses, which are set further back from the western boundary than the permitted duplexes and are lower in height at 2 No. storeys.

In addition to the change's resultant from Condition No. 2 of the SHD, the scheme was further amended to reflect the policies of the new Development Plan (*Dublin City Development Plan 2022-2028*). In this regard, LRD 1 proposed to provide 636 No. dwelling units, a creche, new cultural/community spaces, and public and communal open spaces, with heights ranging from part 2 No. to part 10 No. storeys.

Dublin City Council previously decided to Grant Permission for LRD 1 in August 2023 (DCC Reg. Ref. LRD6026/23-S3) and subsequent to Third-Party Appeals against DCC's decision, permission was granted by An Coimisiún Pleanála on 19th December 2023 (ACP Reg. Ref. ABP-317921-23).

This Grant of Permission was subsequently Judicially Reviewed and a Decision from the High Court is awaited at the time of lodging this new application. As will be detailed further in this Report, the main changes proposed in the new LRD scheme (LRD 2) relate to additional commercial floor space and a reduction in the number of units proposed and building heights.

4.1.2.1 Key Comments Made by Dublin City Council in the Planner's Report and An Coimisiún Pleanála in the Inspector's Report

Please see below key comments made by Dublin City Council in the Planner's Report and An Coimisiún Pleanála in the Inspector's Report. This positive commentary demonstrates the appropriateness of the development at the subject lands.

Dublin City Council:

Principle of Development

"The proposed development to provide for a 'build to sell' large residential scheme is considered to be acceptable and in line with the revised zoning of the site which is Z12 with the objective of 'to ensure existing environmental amenities are protected in the predominantly residential future use of these lands'.

The site will provide for a large number of residential units i.e. 636 units in a highly sought after existing residential area which is located in an area within close proximity to employment, public transport and a range of services and facilities."

Building Height

"The proposal varies little from the previous scheme in relation to the massing and height of the development. The previous opinion of the Planning Authority in relation to its height was generally acceptable, with Block A1 at 10 storeys the most significant element of the scheme. It is proposed to retain the original light 'buff' brick material as the primary finish to this taller element which enhances the building as an extruded corner emerging from the cranked, horizontal form below of the same material finish. It is proposed to use a red brick finish on the adjoining 5 storey 'return

element'. It is acknowledged that this corner of the site is the most suitable for a taller structure but without seriously impacting on the visual amenity of Sandford Road and Milltown Road.

In the previous application the Planning Authority considered that although the proposed residential blocks would be of greater height and mass than those in the immediate context, it was considered that the height of the proposal could be successfully integrated into the area without causing undue harm to the visual amenities of the wider area."

"It is noted that the size and location of the site, being adjacent to good public transport, employment and a wide range of amenities and services, provides an opportunity for a high density scheme of some scale at this location. In general, the approach to the distribution of that scale and massing, stepping the height down on boundaries and setting back the blocks adjacent to neighbouring dwellings, is considered appropriate. The western boundary has the least separation distances but the applicant has stepped down the development at this boundary to provide 3 storey duplex units."

Building Materials & Design

"The quality of the architecture and palette of materials indicated including the hard landscaping finishes are of a good standard."

"There is variety in the scale and a consistency in the rhythm and proportions of the buildings, with a contemporary design that would make a positive contribution towards place-making in the area."

Impact to Neighbouring Properties

"Regarding the potential impact on the properties along Cherryfield Avenue Lower in terms of overshadowing and overbearing, given their 3 stories this is not considered to be unacceptable."

Density

"The proposed development has a stated plot ratio of 1.28 which is within the plot ratio limitations prescribed by the Development Plan. The proposed site coverage of 22.7% is also acceptable in terms of the development plan standards."

Regarding density, Dublin City Council actively encourages higher densities on appropriate sites across its administrative with accompanying highest quality of urban design on accessible, connected sites."

"The density is considered to be suitable given its location and it is noted that the site is within walking distance to Luas and a number of bus routes."

Childcare Facility

"The development provides for a crèche in Block F on the ground floor which will measure 380sq, m and will have a specified outdoor play area. The previous scheme had capacity for 80 spaces, the capacity here is 76 spaces. The Childcare Demand Assessment outlined a demand generated as a result of this development would be between 10-20 spaces. It is noted that as new residential developments are built this will influence demand. The applicant has complied with their requirement in relation to provision of childcare facilities."

Retained Structures

"It is considered that the selective demolition of Milltown back house and its later rear extension, the Finlay wing and the Archive building is justifiable and that their removal will facilitate the successful adaptation and improved integration of the retained structures Tabor House (C) and the Chapel (D) into the proposed redevelopment on the subject site. The two structures proposed for retention will collectively serve to uphold the character of the site and retain a tangible link to its historic use."

Public Open Space

"The development will provide the required public open space to the east of the site fronting onto Sandford Road and Milltown Road which exceeds 25% of the site, in addition to a woodland area to the north of the site. It is considered the development has been designed and landscaped to cater for the residents within the development but also for the community."

Conclusion

"The proposal has been assessed against the policies and objectives of the Dublin City Council Development Plan 2022 -2028 and accords with all relevant National and Regional policies. Therefore the proposal is considered to be acceptable and in line with the Z12 zoning objective of the site and proper planning and sustainable development of the area."

An Coimisiún Pleanála:

Principle of Development

"I am satisfied that the proposed development is consistent with the Z12 zoning objective of the City Development Plan and meets the criteria set out under this zoning in relation to public open space provision and masterplan. The principle of the proposed would be acceptable at this location."

Density

"I would be of the view that the site is suitable site for increased densities based on both national local planning policy and have no reason to consider that the density proposed is excessive unless other factors such as overall quality of development, visual impact, scale and physical impact on adjoining properties demonstrate to contrary (including the criteria under Table 3, Appendix 2).....The proposed development in this location would not contradict density standards contained in the Development Plan 2022-2028 which advocates an approach of consolidation and densification in the city and the proposed density complies with Government policy to increase densities on underutilised lands within core urban areas in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change."

Building Height

"Overall, I am satisfied that the proposed development would make a positive contribution to the area and would respond well to the natural and built environment in visual terms. At the scale of the neighbourhood there would be capacity to absorb buildings at the height proposed. I am also satisfied that the scale of the site and the layout of development, would readily allow for development at the heights proposed. The zoning and characteristics of the site have dictated that no development is provided along the road frontage of the site with proposal to provide for

significant levels of public open space and retain existing trees. This approach means the development is setback significantly from the roadside boundaries and the height of structures is suitably modulated. The building heights proposed would be in accordance with national policy and guidance to support compact consolidated growth within the footprint of existing urban areas, and would satisfy the criteria set down under Section 3.2 of the Urban Development and Building Heights guidelines and the criteria set out under Dublin City Development Plan (Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale are under Table 3 of Appendix 2)."

Visual Impact

"I am satisfied that the overall visual impact of the development although entailing significant change in scale from existing development on site and the surrounding area can adequately be absorbed at this location and would be acceptable in the context of the visual amenities of the area."

Residential Amenity

"The proposed development provides a design and layout that provides units of an appropriate size, layout, orientation, sufficient levels of daylight and sunlight to the proposed residential units, and associated public and communal open space areas of sufficient scale, layout and quality. The proposed development will result in an acceptable level of residential amenity for future occupants of this development."

Impact to Neighbouring Properties

"I am satisfied that the design and layout of Block E and D have adequate regard to the amenities of adjoining properties to the west along Cherryfield Avenue Upper and Lower and will not result in any significant overlooking or overbearing impacts."

"I am satisfied that there is an adequate degree of separation between Blocks C and A1 from adjoining residential development to the north and west to the degree that the proposal would not result in any significant overlooking and overbearing impacts to the residential properties to the west and north. As currently stands the area on site to the rear of Norwood Park is a wooded area with mature trees with the intention to retain these areas as such, provide additional planting and management of such. This fact taken in conjunction with the level of separation will ensure no adverse impact on the residential amenities of the existing properties."

"There are residential properties in the vicinity that do not immediately adjoin the boundaries of the site and such include existing three storey dwellings to north on the opposite side of Milltown Road (no. 132-138), a three-storey apartment block to the east (Mount Sandford), a six storey apartment block to the east (Rowan/Cedar Hall in Millbrook Court) and a six storey apartment block to the south east (Grove House), all on the opposite side of Sandford Road. In the case of all of these existing properties, the layout of development on site is such that all blocks are setback from the roadside boundaries due to the proposal to retain such areas as public open space and to retain existing trees in these areas with augmented landscaping. The level of separation between the proposed blocks and these existing properties is sufficient (50m upwards) to prevent any adverse impact on the residential amenities of these properties through overlooking. The existing properties are buffered by the existing public roads defining the northern and eastern boundaries existing boundary treatment and planting on site and on adjoining sites to the north, east and south east."

Daylight & Sunlight

"I am of the view that the level of detail submitted by the applicant is sufficient and a reasonable technical basis to assess impact of the development on daylight levels to adjoining properties. I am satisfied that the proposed development does not have disproportionate impact on daylight levels to any single adjoining property and all windows serving such with overall levels of compliance with BRE target high."

"I am of the view that the level of detail submitted by the applicant is sufficient and a reasonable technical basis to assess impact of the development on sunlight levels to adjoining properties. I am satisfied that the proposed development does not have disproportionate impact on sunlight levels to any single adjoining property and all windows serving such with overall levels of compliance with BRE target high."

"I am of the view that level of impact on SOG in the majority of cases is not significant. In the case properties that are below target values existing constraints play a part including extension and projections to the rear of the properties along Cherryfield Avenue. As noted above the proposed pattern of development, which includes three-storey flat roof duplex block backing onto the existing properties is not out of character in terms of pattern of development and separation distances at this urban location."

"I am satisfied that the level of overshadowing impact from the proposed development will not be disproportionate in relation to adjoining development during March and June with impact in December negligible. The proposed development has adequate regard to overshadowing impact with development along the western side confined to three storeys and adequate levels of separation provided between the proposed structures and existing development to north, west and east."

"I am satisfied that the overall design and scale would have adequate regard to the amenities of adjoining properties and would be acceptable in the context of daylight and sunlight/overshadowing, impact in terms of overlooking and its general physical relationship to existing residential development in the area. The proposal provides an appropriate balance between providing a development that is an efficient use of zoned, serviced accessible lands and protecting adjoining residential amenity."

Traffic Impact

"The traffic assessment concludes that the overall impact of the proposed development on the local network will be satisfactory. I am satisfied that the TTA takes a reasonable approach to assessing the traffic impact of the proposed development on the local network. This assessment is worst case scenario approach taking into account the cumulative impact of other permitted developments in the area, application of a traffic growth factor in the modelling approach to assessing future impact of the proposal. The appeal site is also located in a location accessible to public transport infrastructure and in walking distance of a wide array of employment, social/community services, retail development and local services concentrated in Rathmines, Ranelagh and Donnybrook as well as accessibility to public transport that provides access to the city centre and outskirts (Bus and Luas)."

Car & Bicycle Parking

"I am satisfied that the site is highly accessible for other modes of transport including public transport, cycling and pedestrians and to local services including employment uses. The applicant has submitted a Mobility Management Plan outlining how the development is accessible for alternative modes of transport other than private car. In my view the development and its location meet the criteria set down under the Development Plan for a reduced rate of parking. The site is well serviced by high frequency public transport, the site/development is well connected to existing pedestrian routes, the site is in walking distances of local services/urban centres and employment uses and there is provision of shared mobility options (10 no. car share spaces). I would consider that the level of parking proposed is of an acceptable level to cater for the demand likely to be generated."

"The appeal submission raise concerns regarding overspill of parking into adjoining residential areas. Having inspected the intervening area it is notable that there is no on-street parking options along Milltown and Sandford Road and that residential areas within the surrounding area are subject to pay and display/permit parking (Norwood Park and Cherryfield Avenue Lower) or are managed developments, which are parking control measures that would prevent the overspill of parking from the proposed development into the surrounding area. In this regard I do not consider that overspill of parking is likely and that the future residents of the development will be aware of the parking provision arrangements associated with the development when buying into or choosing to live in the scheme."

"Sufficient car and bicycle parking is provided with the level of car parking satisfactory in the context of the location of the site at an accessible location in terms of public transport and local employment and services with regard had to need to shift the emphasis to use of alternative modes of transportation and reduce dependency on vehicular traffic in accordance with national, regional and local planning policy."

Connectivity & Site Layout

"In terms of cycling infrastructure there are no cycle paths along Milltown Road however the development does have direct access to existing dedicated cycle paths along Sandford Road and there is a good level of connectivity through the site for pedestrians and cyclists without any conflict with traffic movements with no through access between the vehicular access points serving the development."

"The proposed development would provide an improved level of connectivity with satisfactory connectivity to existing pedestrian footpaths and cycle paths in the area."

Childcare Facility

"I am satisfied that the applicant has demonstrated that the childcare facility proposed with a capacity for 76 children is sufficient to cater for future demand as well as demand from outside proposed development. I am satisfied that this is based on the profile of units proposed on site with exclusion of the studio, one bed apartments and a portion of the two bed units justified and based on the demographic profile of the area."

"I am satisfied that the proposed development is provided with a childcare facility of adequate size based on the type and nature of residential development proposed and the likely demand generated by the proposed development. The provision of such is consistent with Development Plan policy and

the recommendation of national guidelines. The provision of the childcare facility will also provide for demand generated in the intervening area and provides a facility in close proximity to established residential development."

"The appeal submissions and observations raise concerns regarding the level of outdoor space associated with the childcare facility. The childcare facility is provided with 390sqm of external space provided exclusively for this use and separate to the other open space areas. The Childcare Guidelines provide no specific development standard for outdoor space for a childcare facility and I have no reason to conclude that this level of space is insufficient."

Accessible Location

"I would reiterate that the site is zoned lands in an urban area with access to a considerable level of existing services and facilities including educational facilities within the area as well as access to public transport making the development accessible to services outside of the surrounding area."

Ecology

"I am satisfied that sufficient information has been submitted regarding the ecology and biodiversity on site and I am satisfied that the site is of moderate value in terms of being a habitat for flora and fauna. I am satisfied that proposal provides a sufficient balance in developing the site for residential development in accordance with zoning policy and retaining a sufficient degree of existing ecological features, which will be enhanced by additional planting, eradication of invasive species currently on site and management measures to encourage biodiversity."

Demolition of Existing Structures

"Having inspected the site it is notable that the existing structures on site are not included on the record of protected structures or on the National Inventory of Architectural Heritage. I would also be of the view that the structures for demolition do not contribute significantly to the architectural character of the area given their haphazard arrangement and the fact that there have been several later additions over time. The proposal which includes the retention of the Chapel and Tabor House would improve the setting of these structures, which are the best quality in terms of architectural character and features. I accept the view that the existing structures for demolition would not lend themselves easily to being repurposed for residential development."

"I would consider that the proposed development strikes an appropriate balance between the retention of existing structures on site and providing for the comprehensive and efficient development of the site in accordance with Development Plan, National and Regional policy objectives. In this regard the level of demolition proposed on site is justified."

4.2 Other Planning Applications at the Subject Site

There is a recent planning application pertaining to a portion of the subject site, which was granted by Dublin City Council on 7th September 2021. Subsequent to a Third Party Appeal, An Comisiún Pleanála decided to Grant Permission on 10th February 2023 as detailed in Section 4.2.1 below. In addition, there have been 4 No. previous planning applications pertaining to the subject lands.

4.2.1 DCC Reg. Ref. 3866/20 (ACP Reg. Ref. ABP-311552-21) – Separation Works Application

The 'separation works' application was lodged as a condition of sale when the Jesuits' sold the surplus lands to the Applicant. The 'separation works application' included a request for permission to demolish the link between Milltown Park House Rear Extension (within the site subject to this LRD application) and the red brick building within the adjacent Jesuits' lands. The works also included the construction of a 2.4-metre-high boundary wall in order to separate the lands.

After permission was granted in February 2023, the separation works were carried out and essentially separate the lands that are being retained by the Jesuits to the south from the lands within the ownership of the Sandford Living Limited that are being developed as part of this LRD application. Details of the application are provided in the table below.

DCC Reg. Ref.:	3866/20 (ACP Reg. Ref. PL29S.311552)
Location:	Milltown Park, Sandford Road, Dublin 6
Application Date:	4 th December 2020
Brief Development Description:	The development will principally consist of the demolition of 83.7 sq m of the 'red brick link building' (single storey over basement) which forms part of the Jesuit Community Buildings and the construction of a new 2.4 metre high boundary wall across the site from east to west. The proposed works to the red brick link building include the following: - the demolition of a 3 no. bay section of facade and a section of roof; - the removal of a section of the internal floor area and provision of new internal stairs; - the removal of the existing 'means of escape' external stairs from the roof; - the construction of a new gable wall and parapet over roof to match existing, - a new external 'means of escape' stairs from roof level and a new security fence to the 'means of escape' stairs. The development will also consist of hard and soft landscaping and all other associated site works (internally and externally) above and below ground.
DCC Decision Date:	7 th September 2021
DCC Decision:	Grant Permission
ACP Ref.:	ABP-311552-21
ACP Decision Date:	10 th February 2023
ACP Decision:	Grant Permission Subject to 2 No. Conditions

4.2.2 DCC Reg. Ref. 3044/13 / ACP Ref. PL29S.242764 – 'Temporary School Accommodation'

DCC Reg. Ref.:	3044/13
Location:	Milltown Park, Sandford Road, Ranelagh, Dublin 6
Application Date:	2 nd August 2013
Brief Development Description:	The erection of single storey temporary school accommodation (1,128 sq m) on the Society of Jesus Lands, Milltown Park, Sandford Road Dublin 6. The development will comprise 9 No. temporary classrooms, principals offices, school office staff room, resource rooms, ancillary accommodation, amendments to existing car parking layout to provide drop off /pick up area and external play area enclosed by 2.1m high palisade fencing and provision of 34 No. replacement car parking spaces, and all associated site development works. Access / egress

	to/from the temporary school will be via the Sandford Road entrance to Milltown Park Only.
DCC Decision Date:	18 th November 2013
DCC Decision:	Grant Permission Subject to 10 No. Conditions
ACP Ref.:	PL29S.242764
ACP Decision Date:	26 th March 2014
ACP Decision:	Grant Permission subject to 6 No. Conditions

Under DCC Reg. Ref. 3044/13, planning permission was sought for the erection of a single storey temporary structure to accommodate a school on the subject site. The proposed development comprised of 9 No. classrooms, ancillary offices and staff facilities. The proposed development also included amendments to the existing car parking layout to provide drop off/pick up area and an external play area enclosed by a 2.1 m high palisade fence, the provision of 34 No. replacement car parking spaces and all associated site development works.

On 18th November 2013, Dublin City Council decided to Grant Permission for the proposed scheme, subject to 10 No. conditions, including that the permission be for a limited period of 2 No. years from the date of the grant.

The decision of Dublin City Council was the subject of a Third-Party Appeal to An Comisiún Pleanála (ACP Ref. PL29S.242764).

The Commission ultimately decided to Grant Permission for the proposed scheme, subject to 6 No. conditions. The permission was valid for a period of two years from the date of the decision and expired on 26th March 2016.

4.2.2.1 Applications to Extend the Duration of the 'Temporary School Accommodation' Permission

DCC Reg. Ref. 2673/16 / ACP Ref. PL29S.246869 – 'Extension of Duration'

Under DCC Reg. Ref. 2673/16 / ACP Ref. PL29S.246869 permission was sought for the extension of the duration of the development permitted under DCC Reg. Ref. 3044/13 / ACP Ref. PL29S.242764. The proposed development would result in the reduction of the number of classrooms from 9 No. to 5 No. reducing the overall footprint from 1,128 sq m to 745 sq m. All other ancillary development including the external play are and drop off/pick-up area remained unaltered.

On 8th June 2016, Dublin City Council decided to Grant Permission for the proposed development, subject to 5 No. conditions.

The decision of the Planning Authority was the subject of a Third-Party Appeal to An Comisiún Pleanála (ACP Ref. PL29S.246869).

The Commission ultimately decided to Grant Permission to the proposed development subject to 5 No. conditions. One of the conditions attached to the permission stated that the permission shall apply until 1st September 2018.

DCC Reg. Ref. 3913/18 – 'Further Extension of Duration'

On 10th September 2018, under DCC Reg. Ref. 3913/18 permission was sought for the extension of duration of the previously permitted development (DCC Reg. Ref. 2673/16 / ACP Ref.

PL29S.246869) until 31st August 2019. The number of classrooms and overall footprint of the building remained unchanged.

On 2nd November 2018, Dublin City Council decided to Grant Permission for the proposed development, subject to 3 No. conditions. One of the conditions attached to the permission required that the use of the site and associated structures shall cease on 31st August 2019 and that the structures shall be removed and land returned to its former state prior to this date.

This temporary primary school at the north-western corner of the subject site was removed from the subject site when the permission expired in August 2019 and the upgrade works of St. Mary's National School on Belmont Avenue were completed.

4.3 Application Pertaining to Boundary Wall to the South (Redline Overlaps with the Subject Redline Boundary)

DCC Reg. Ref.	4333/15
Location:	Milltown Park, Ranelagh, Dublin 6
Application Date:	23 rd December 2015
Brief Development Description:	The development will consist of the demolition of the existing boundary wall and sliding gate at the side entrance to Milltown Park on Milltown Road Dublin 6 and its replacement with a new boundary wall consisting of a low level plinth wall with railings over and new set back entrance with both pedestrian and traffic gates together with new signage, associated landscaping and parking reconfiguration.
DCC Decision Date:	25 th February 2016
DCC Decision:	Grant Permission Subject to 4 No. Conditions

This permission established a separate access for the remaining Jesuit lands, which the Jesuits will continue to use to access their lands (see Figures 4.1 & 4.2 below).

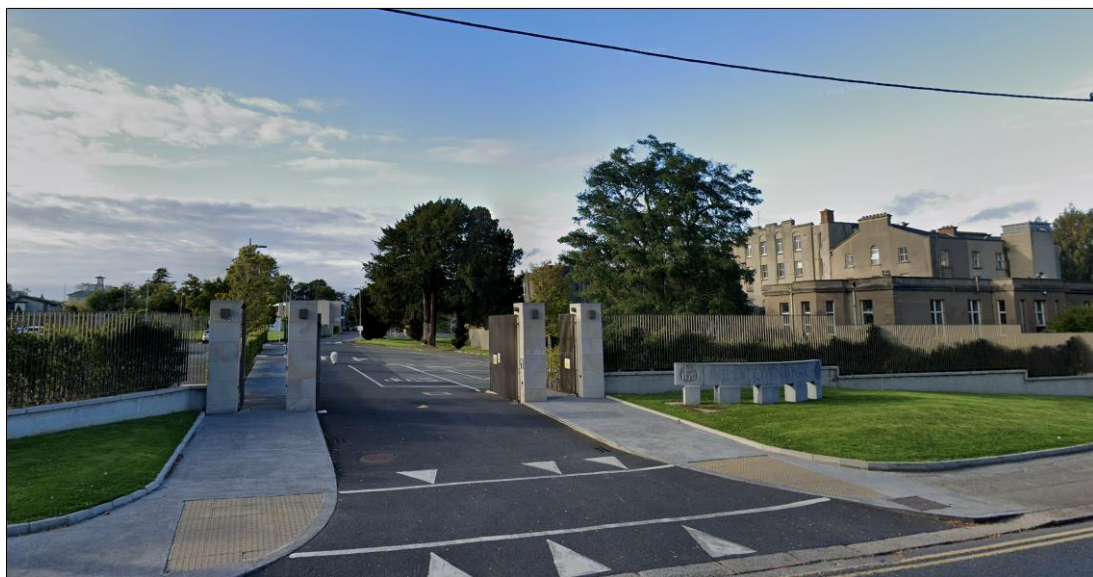


Figure 4.1: Image of the Milltown Road Entrance to the Jesuit Lands

(Source: Google Maps, 2025)

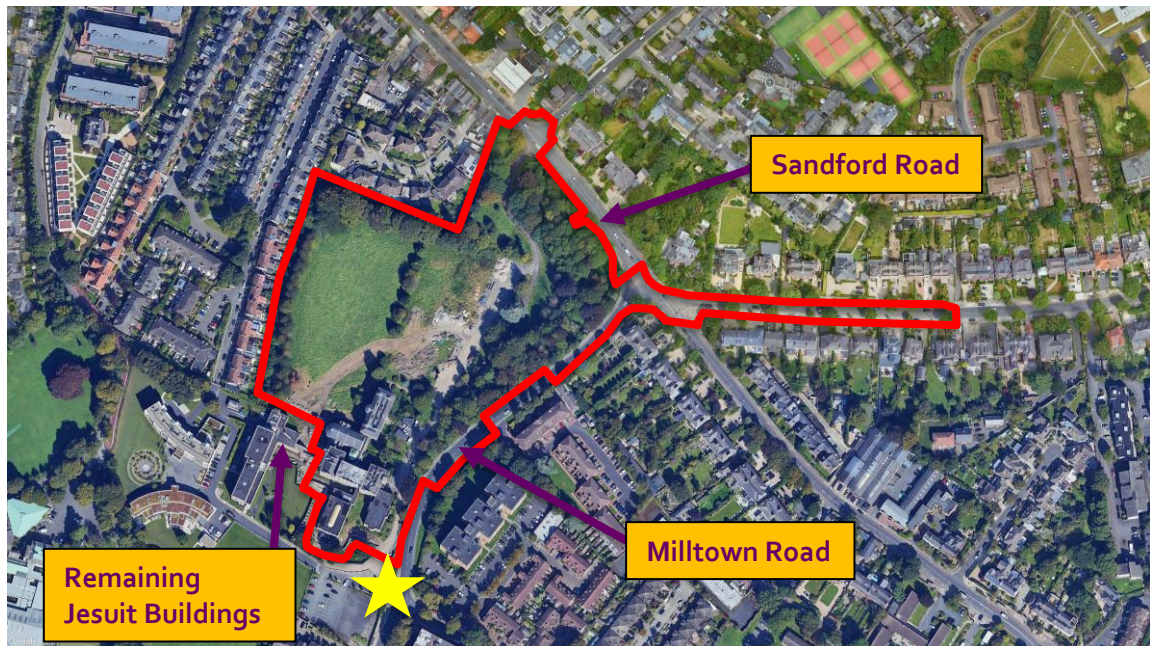


Figure 4.2: Indicative Location of the Jesuit’s Milltown Road Entrance Indicated by a Yellow Star

(Source: Google Maps, annotated by Thornton O’Connor Town Planning, 2025)

4.4 Other Planning Applications on the Retained Jesuit Lands

DCC Reg. Ref.	3116/22
Application Date:	21 st April 2022
Brief Development Description:	Planning permission for the development will consist of the construction of a two-storey archive storage and office building with c.765 sq m of combined floorspace provided including the following: (i) a reception area, an oratory, an archive storage room, research reading room, offices, storage rooms, staff canteen, toilets, shower, passenger lift, audio room and ancillary space; (ii) rooflights, photovoltaic panels and lift over-run at roof level; (iii) 9 No. parallel car parking bays along the existing roadway with the existing fence relocated to the site boundary and 15 No. new cycle parking spaces; (iv) residual car parking, hard and soft landscaping, heat pump and all associated site development works.
DCC Decision Date:	18 th May 2022 [Final Grant 20 th June 2022]
DCC Decision:	Grant Permission Subject to 10 No. conditions

DCC Reg. Ref.	2824/13
Application Date:	26 th June 2013
Brief Development Description:	Development of the Cherryfield Avenue entrance. The development will consist of demolition and widening of the existing gated vehicular entrance including aligning the entrance with the existing road of Cherryfield Avenue and the construction of a new pedestrian access

	gate. To include the construction of new gate piers, new gates and all associated works.
DCC Decision Date:	10 th March 2014 [Final Grant 22 nd April 2014]
DCC Decision:	Grant Permission Subject to 5 No. Conditions

DCC Reg. Ref.	3052/11
Application Date:	27 th July 2011
Brief Development Description:	The development will consist of a 92 sq m single storey extension to the south facing facade of the Cherryfield Nursing Home, with a green flat roof, 2 No. roof lights, demolition of pergola and all associated site works and landscaping.
DCC Decision Date:	20 th September 2011 [Final Grant 4 th November 2011]
DCC Decision:	Grant Permission Subject to 7 No. Conditions

DCC Reg. Ref.	4775/07
Application Date:	10 th August 2007
Brief Development Description:	Amendments to existing planning permission (Ref: 5393/06 and An Bord Pleanála Ref: PL29S.221293), to include revisions to the north facade of the new residential accommodation building, an increase in overall area from 3,930 sq m to 4,076 sq m, the addition of rooflights and two new first floor en-suite bedrooms to the proposed new nursing home. The overall height of the new nursing home is to be increased from 6.3m to 7.35m and the height of the new residential accommodation building is to be increased from 12.3m to 12.75m.
DCC Decision Date:	2 nd October 2007 [Final Grant 15 th November 2007]
DCC Decision:	Grant Permission Subject to 5 No. Conditions

DCC Reg. Ref.	5393/06 [ACP Reg. Ref. PL29S.221293]
Application Date:	4 th October 2006
Brief Development Description:	Demolition of the existing 980 sq m single storey Cherryfield Nursing Home and the development of a new 1,448.82 sq m two storey Nursing Home and a 2,481.74 sq m four storey accommodation building for the Jesuit Community, part demolition to widen and reinstatement of the gated entrance on Milltown Road.
DCC Decision Date:	28 th November 2006 [Final Grant/An Coimisiún Pleanála Decision Date 23 rd May 2007]
DCC Decision:	Grant Permission Subject to 8 No. Conditions

4.5 Recent Application for Increased Height on a Corner Site in the Vicinity

DCC Reg. Ref.	3047/18 [ACP Reg. Ref. PL29S.303708]
Location:	Site located at Nos. 1, 3, 5, 7, 9 and 11, Eglinton Road, Donnybrook, Dublin 4
Application Date:	18 th May 2018
Brief Development Description:	Planning permission for a residential development of 94 No. apartments (and a ground floor cafe of c. 67 sq m) all on a c. 0.38 hectare site. The proposed development will consist of: 1) Demolition of existing 6 No. two storey dwellings and ancillary structures; 2) Construction of a residential development of 94 No. apartment

	comprising 15 No. 1 bedroom apartments, 62 No. 2 bedroom apartments and 17 No. 3 bedroom apartments (all apartments to have balconies or roof terraces), with an overall height of 7 storeys (over basement/part second basement level) at junction of Eglinton Road and Donnybrook Road, reducing in height to 5 and 4 storeys along Eglinton Road and (5-7 storeys) along Donnybrook Road, and 3 storeys along Brookvale Road. 3) Provision of ancillary areas (residents meeting room/lounge with terrace, management area) at ground floor level; 4) Ground floor cafe of c. 67 sq m at ground floor level onto Donnybrook Road with terrace and signage zone of c. 2 sq m); 5) Vehicular access will be provided from Brookvale Road into basement levels which will provide 100 No. car parking spaces (including car stacker system), 5 No. motorcycle spaces and 94 No. cycle spaces and all ancillary areas (to include plant, storage and attenuation); 6) The development includes all associated site development works, hard and soft landscaping (to include 20 No. cycle spaces at ground floor level) and all other ancillary works to include provision of an internal communal landscaped open space area at ground floor and deck area at fourth floor level on western boundary; 7) Provision of hoarding around site boundary (with scheme advertisement zone c. 302.25 sq m along Eglinton Road and Donnybrook Road) during construction phase
DCC Decision Date:	22 nd January 2019
DCC Decision:	Grant Permission subject to 18 No. conditions ^{22nd}
Note:	Decision of DCC was the subject of 3 rd party appeals to An Coimisiún Pleanála
ACP Decision:	Grant Permission on 11 th June 2019 subject to 18 No. conditions

The lands on Eglinton Road and the subject lands at Sandford Road are both corner sites fronting prominent junctions, at each end of Eglinton Road. Please see Figure 4.3 below for the location of the Eglinton Road site in proximity to the subject site.

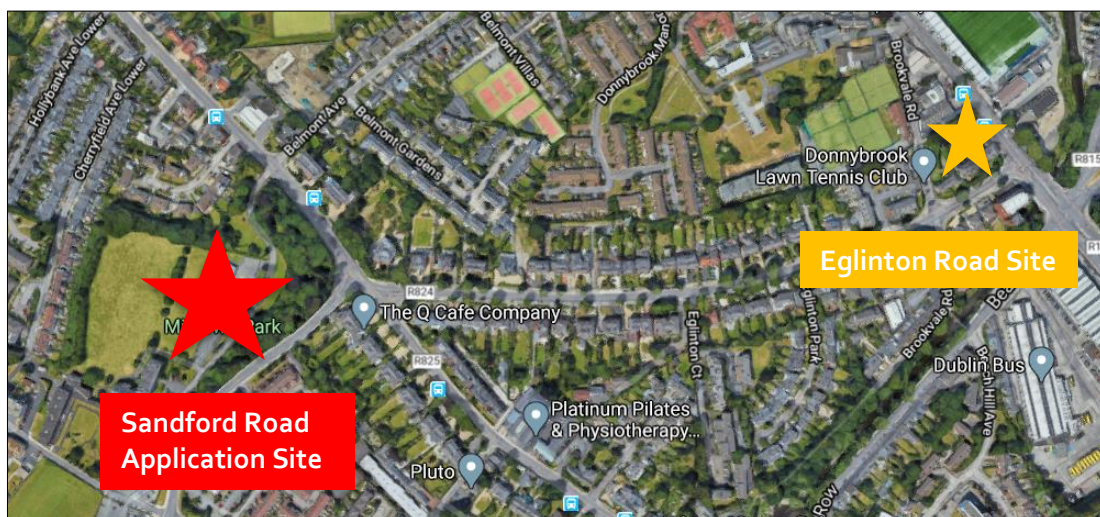


Figure 4.3: Location of DCC Reg. Ref. 3047/18 [ACP Reg. Ref. PL29S.303708] (Orange Star) in Proximity to the Subject Lands at Sandford Road (Red Star)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2025)

The An Coimisiún Pleanála Inspector noted the following in relation to the granted 4 No. to 7 No. storey residential development:

"The location of the site at a junction and along Donnybrook Road, which is defined by a wide and busy public road means overall visual impact of the proposal would not be a negative one...I would reiterate that the location of the site at the junction of Donnybrook Road and Eglinton Road lends itself to a structure of increased bulk and scale such as this and that wider views of the proposal are satisfactory."

The Inspector further noted that the site:

".....is located on a larger triangular shaped block of development defined by the three public roads...Its location with significant frontage along Donnybrook Road, detached from the village and at a junction would allow for a building of significant scale".

The Inspector's assessment of the scheme therefore concluded that the increase in height was acceptable on the corner site bound by public roads on 3 No. sides and fronting a junction. We note that the Eglinton Road site is 0.38 Ha in size whereas the developable size of the subject Sandford Road site is c. 4.26 Ha., which is significantly larger. The subject site at Sandford Road is bound by public roads on 2 No. sides and also fronts a significant road junction. Therefore, as increased height has been accepted on a smaller corner site in the vicinity of the subject site, which was granted prior to the introduction of the *Building Height Guidelines*, it is considered acceptable to provide increased heights (principally ranging from part 2 to part 8 No. storeys) at the subject site.

Subsequent to this grant of permission at the Eglinton Road site, a Strategic Housing Development Planning Application was lodged on 2nd June 2020 for 148 No. apartments ranging in height from 4 to 12 No. storeys replacing the earlier scheme as detailed below:

ACP Reg. Ref.	PL29S.307267
Location:	Site located at Nos. 1, 3, 5, 7, 9 and 11, Eglinton Road, Donnybrook, Dublin 4
Application Date:	2 nd June 2020
Brief Development Description:	<p>The proposed development will consist of:</p> <ol style="list-style-type: none"> 1) Demolition of existing 6 No. two storey dwellings and ancillary structures at No. 1, 3, 5, 7, 9 and 11 Eglinton Road; 2) Construction of a residential development of 148 No. apartment units comprising 71 No. 1 bedroom units, 58 No. 2 bedroom units, 9 No. 2 bedroom duplex units, and 10 No. 3 bedroom units; 3) The height of the proposed development ranges from 3 to 4 storeys along Brookvale Road, 5 to 12 storeys along Donnybrook Road, 4 to 12 storeys along Eglinton Road, including a double height feature at 12th storey level at the junction of Eglinton Road and Donnybrook Road, with a maximum overall height of 43.1 metres over existing ground level; 4) Provision of private open space to serve all residential units in the form of balconies or terraces; 5) Provision of ancillary residential communal areas including external central landscaped courtyard, internal resident amenities spaces at ground floor level including residents lounge, co-working space, gym,

	<p>management area and bicycle store with 28 No. spaces and at seventh floor level including cinema room, reading room, and 2 No. rooftop terraces located on the north and south elevations;</p> <p>6)Provision of basement including 75 No. car parking spaces, 4 No. motorcycle spaces and 172 No. cycle spaces and all ancillary areas such as plant, storage and attenuation;</p> <p>7)Vehicular access will be provided from Brookvale Road;</p> <p>8)The development includes all associated site development works, hard and soft landscaping (to include 4 no. cycle spaces at street level) SUDS drainage, PV panels on roof of 12th storey, provision of hoarding around site boundary (with scheme advertisement zone c. 302.25 sq m along Eglinton Road and Donnybrook Road) during construction phase, ESB substation and all other ancillary works necessary to facilitate the development;</p>
ACP Decision:	Grant Permission subject to 28 No. conditions
ACP Decision Date:	31 st August 2020

The An Coimisiún Pleanála Inspector noted the following in relation to the SHD application in relation to the progression of National Policy:

*"I also note that the evolution of national **policy which supports the increased scale of residential buildings in appropriate locations and that this will invariably mean that residential buildings become more prominent structures in the townscape.** The tallest part of the proposed development is located on the south east corner of the site, opposite a commercial building to the south and the stadium to the east, focusing height away from the more sensitive residential properties to the west and south west. **I consider that the site is therefore appropriate for a building of increased height and scale, forming a landmark at this intersection for Donnybrook on the edge of the city centre.**" [Our Emphasis]*

Furthermore, the ACP Inspector noted the following in relation to building heights:

*"I recognise that the construction of the proposed development on the site represents a significant change in scale for the area at this end of Eglinton Road. However, **I am also mindful of the approach taken in the Building Height Guidelines which identifies that increased building height has a critical role to play in addressing the delivery of more compact growth in urban areas. While the existing scale surrounding the site is largely 2-3 storey, this is reminiscent of traditional, limited, low-rise building heights (as described in the guidelines) which is limiting the growth and development need of the city.** I recognise the surrounding sensitivities for this site, including more historical settings in the nearby conservation areas and for Protected Structures, however the immediate vicinity of the site at this end of Eglinton Road, does not exhibit these same sensitivities and the quality of design ensures that the proposed development will be a positive addition to the streetscape and in views from more sensitive areas around the site."* [Our Emphasis]

In relation to density of 385 No. units per hectare, the ACP Inspector stated:

*"The proposed density is 385 units per hectare. This is increased from the approved development on the site which has a density of 244 units per hectare. **Policy at national, regional and local level encourages higher densities in appropriate locations.** Project Ireland 2040: National Planning Framework (NPF) promotes the principle of 'compact growth'. Of relevance, objectives 27, 33 and 35 of the NPF which prioritise the provision of*

new homes at locations that can support sustainable development encouraging increased densities in settlements where appropriate.

*The site is a short walk (less than 15 minutes) to surrounding employment centres (RTE Campus / Beech Hill Office Campus / Ballsbridge). The site is also approximately 1,380m from Sandymount DART, equivalent to a 17 minute walk from the site and in my view, a reasonable walking distance. The proposed development is also located along a public transport corridor with an existing Quality Bus Corridor (QBC) running along Donnybrook Road. The nearest bus stop is located along the road frontage on the site on Donnybrook Road. As such, **I consider that the site can be described as a central / accessible location as defined under the Apartment Guidelines and sustainably support the increased density level proposed.**" [Our Emphasis]*

Therefore, having regard to the recent grant of permission at the Eglinton Road site, we consider that the proposed development ranging in height from 2 No. 8 No. storeys at a large site at the corner of Sandford Road and Milltown Road providing a density of 140 No. units per hectare in proximity to public transport, employment locations, services and facilities, is an appropriate development on these sustainable and well serviced lands.

Furthermore, the An Coimisiún Inspector noted the following in relation to building height in the granted SHD permission:

"I am satisfied that the location and design of the taller elements of the scheme, with some parts of up to ten storeys along Milltown Road and at the northern tip of the site are acceptable and accord with the requirements and imperative outlined by SPPR 3 of the Height Guidelines and crucially the wider strategic and national policy parameters set out in the National Planning Framework and section 28 guidelines. The height guidelines observe that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development. Furthermore, taller buildings will bring much needed additional housing and economic development to well-located urban areas, they can also assist in reinforcing and contributing to a sense of place within a city or town centre, such as indicating the main centres of activity, important street junctions, public spaces and transport interchanges. In this manner, increased building height is a key factor in assisting modern placemaking and improving the overall quality of our urban environments..."

***I consider the proposed development in terms of height is in accordance with national policy as set out in the National Planning Framework, specifically NPO 13 and NPO 35. The proposed development is furthermore in compliance with the Urban Development and Building Height Guidelines in particular SPPR 3, which references section 3.2 Development Management Criteria. I have assessed the proposed development against the section 3.2 criteria of the guidelines in preceding sections above."** [Our Emphasis]*

Therefore, it is considered appropriate to provide similar building heights as the SHD application, which was permitted by An Coimisiún Pleanála.

4.6 Other Planning Applications in the Vicinity Granted or Seeking Permission

In addition to the Eglinton Road site discussed in Section 4.5 above, we note the following relevant applications which have either been granted permission or are currently seeking planning permission in the vicinity which demonstrates the suitability of the area to provide increased height and density.

No.	DCC Reg. Ref.	Address	Application Date	Summary of Development	Decision/Decision Due
1	3513/20 (ACP Ref. PL29S.309720)	Nos. 25-27 Donnybrook Road and Nos. 1-3 The Crescent, Donnybrook	7 th October 2020	49 No. BTR units and Retail unit (8 No. storeys applied for and 7 No. storeys granted by DCC).	Granted by DCC on 24 th February 2021 [Final Grant Date 26 th May 2021]
2	3301/20 (ACP Ref. PL29S.309378)	Nos. 22-24 Donnybrook Road (Former Kiely's Public House), Donnybrook	2 nd September 2020	100 No. Shared Living Units and Café/Restaurant (part 3 to part 7 No. storeys). 4 No. units omitted via DCC condition.	Granted by DCC on 13 th January 2021 [Granted by An Coimisiún Pleanála on 3 rd December 2021]
3	2189/20 (ACP Ref. PL29S.307375)	Sandford Lodge, Sandford Close	3 rd February 2020	36 No. units over 3 No. storeys.	Granted by DCC on 27 th March 2020 [Granted by An Coimisiún Pleanála on 11 th March 2021]
4	2115/19	Alexandra College	24 th January 2019	203 No. student accommodation bedspaces (part 3 to part 4 No. storeys)	Granted by DCC on 20 th March 2019 [Final Grant Date 25 th April 2019]
5	4578/22 (ACP Ref. PL29S.315883)	'Dunelm', Rydalmount, Milltown Road, Dublin 6	22 nd December 2022	63 No. BTR units [part 4 to part 6 No. storeys over lower ground floor and basement level (maximum of 8 No. levels to Milltown Road)].	Granted by DCC on 27 th January 2023 [Granted by An Coimisiún Pleanála on 18 th January 2024 ¹⁶]
6	4115/21 (ACP Ref. ABP-313048-22)	11C and 9/14 Milltown Road, Milltown, Dublin 6	17 th December 2021	97 No. BTR apartments in 3 No. blocks ranging between part 3 No. to part 6 No. storeys in height [74 No. units permitted]	Refused by Dublin City Council on 18 th February 2022. Granted by An Coimisiún Pleanála on 26 th July 2023.
	WEB2775/24		27 th May 2025	Amendments to permitted 3 No. blocks comprising 74 No. BTR	Granted by DCC on 23 th June 2025 [Final Grant Date 28 th July 2025]

¹⁶ Decision quashed by Order of the High Court on 11th February 2025 and remitted to An Coimisiún Pleanála under new case number ACP Ref. PL29S.322089; decision pending at the time of writing of this Report.

				apartments under Reg. Ref. 4115/21	
7	WEBLRD6063/25-S3 (ACP Ref. LH29S.323142)	Former Paper Mills site and adjoining properties Clonskeagh Road, Dublin 6	9 th May 2025	Student accommodation and residential development including site clearance and demolition of extensions, 439 No. PBSA bedspaces 16 No. residential apartments and the extension and renovation of the 14 No. residential dwellings.	Granted by DCC on 3 rd July 2025 [Granted by An Coimisiún Pleanála on 12 th November 2025]

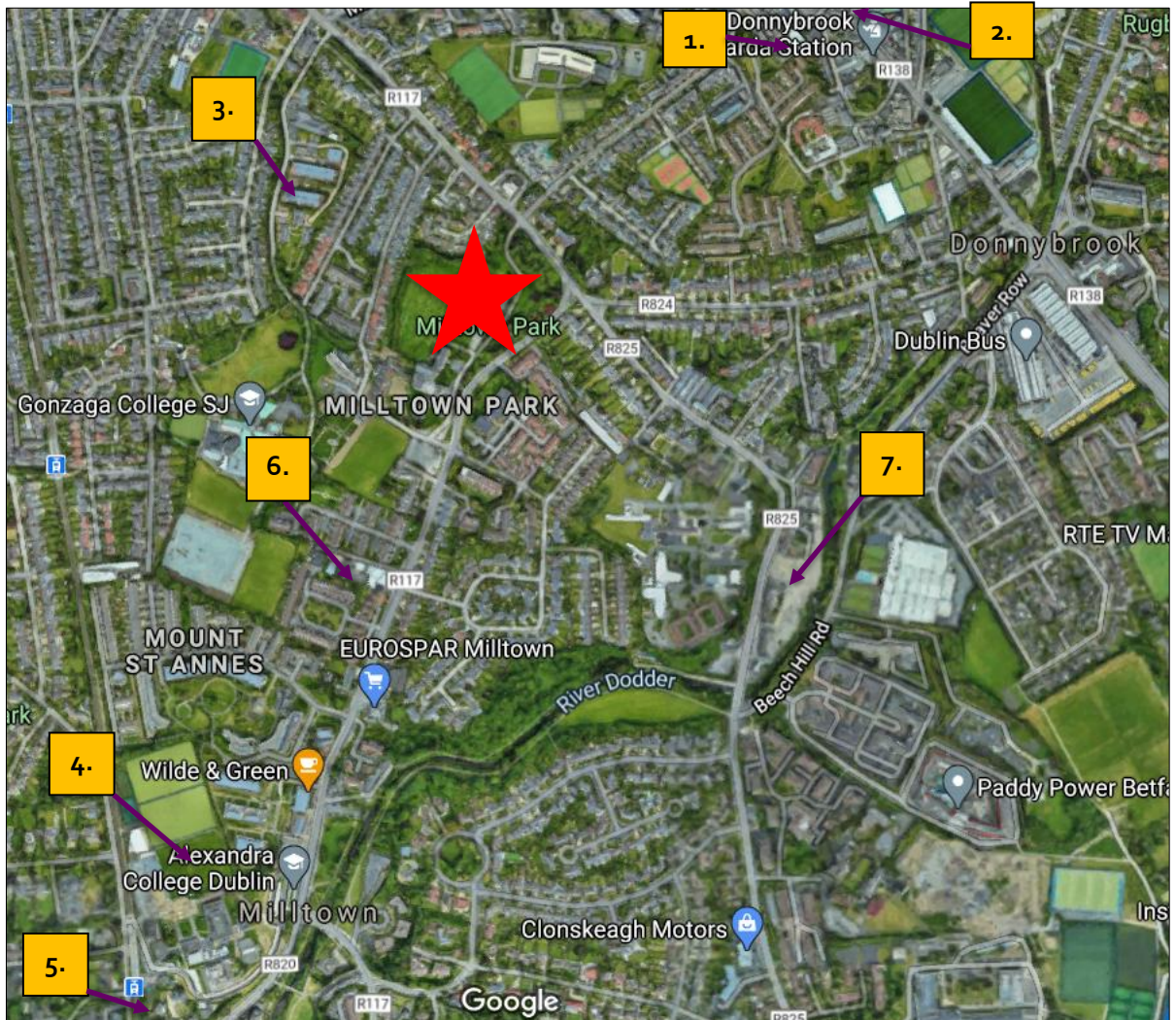


Figure 4.4: Location of Proximate Planning Applications Either Granted Permission or Currently Seeking Planning Permission in the Vicinity for Increased Height and/or Density [Subject Application Site Indicatively Annotated by the Red Star]

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2025)

4.7 Analysis of Planning History

The Planning History has demonstrated that Dublin City Council and An Comisiún Pleanála have both been accepting of the principle of a Large-Scale Residential Development at the subject lands given the granting of both the SHD and LRD 1 applications. Permission was received in 2016 by the Jesuits to provide a separate entrance into what is now their remaining lands ensuring it remains functionally separate from the development lands subject to the current application.

In addition, permission has been recently granted in the vicinity for developments providing increased height and density which confirms that the area is transitioning, and that the subject lands are suitable to accommodate the proposed development. These precedent cases, in addition to the Grant of Permissions issued by An Comisiún Pleanála for the SHD and LRD 1 at the subject site, demonstrates the suitability for the proposed development to proceed with providing buildings ranging in height between 2 No. storeys and 8 No. storeys and a development density of 140 No. units per hectare. It is also noted that the proposed development is of a lesser scale and provides fewer residential units to that previously permitted in the two major applications at the site.

5.0 PROPOSED DEVELOPMENT IN DETAIL

5.1 Detailed Description of the Site Area

The total red line application site boundary is c. 4.74 Ha (c. 47,335 sq m) and is broken down as follows:

- The developable site of c. 4.26 Ha (c. 42,547 sq m) at Milltown Park, Sandford Road
- Road works to Sandford Road and Milltown Road adjacent to the 2 No. entrances to the site (1 No. existing and 1 No. newly proposed): c. 0.16 Ha (c. 1,597 sq m); and
- Drainage works from Milltown Road to Eglinton Road: c. 0.32 Ha (c. 3,191 sq m).

A letter of consent facilitating the proposed works to Milltown Road, Sandford Road and Eglinton Road has been received from Dublin City Council for the LRD Application.

5.2 Key Site Statistics

Total Site Area (Gross):	c. 4.74 Ha (c. 47,335 sq m)
Net Site Area:	c. 4.26 Ha (c. 42,547 sq m)
Existing Gross Floor Area:	c. 7,190.5 sq m
Demolition Gross Floor Area:	c. 4,847.5 sq m including: <ul style="list-style-type: none"> • Milltown Park House (880 sq m); • Milltown Park House Rear Extension (2,031 sq m); • the Finlay Wing (622 sq m); • the Archive (1,240 sq m); and • the link building between Tabor House and Milltown Park House rear extension to the front of the chapel (74.5 sq m).
Retained Gross Floor Area:	c. 2,343 sq m: <ul style="list-style-type: none"> • Tabor House (1,575 sq m); and • The Chapel (768 sq m)
Gross Floor Area (Above Ground):	50,196 sq m
Basement Gross Floor Area	10,550 sq m
Site Coverage:	20.65%
Plot Ratio:	1.18
No. of Units Proposed:	562 No. units (70 No. studios, 176 No. 1-bed units, 267 No. 2-bed units and 49 No. 3-bed units)
No. of Units per Hectare ('uph'):	140 uph
Creche:	375 sq m
Café/Restaurant:	179 sq m
Community/Cultural (Net Floor Space):	1,946 sq m (1,698 sq m internally and 248 sq m externally)
Building Height:	Up to 8 No. storeys plus lift overruns
Car Parking Spaces:	319 No. car parking spaces - 288 No. at basement and 31 No. at surface level

Bicycle Parking Spaces	1,343 No. spaces
Motorcycle Spaces	22 No.
Public Open Space	<p>35.3% (15,023 sq m) of developable site area.</p> <ul style="list-style-type: none"> • Public Park & Plaza connected through the undercroft of Block A1: 10,879 sq m (25.57%) • Northern Woodland Glade: c. 3,000 sq m (7.05%) • Green Boulevard between Blocks A and B: c. 575 sq m (1.4%) • Forecourt / In front of Café/Restaurant: 569 sq m (1.3%)
Communal Open Space	<p>10.4% (4,423 sq m) of developable site area:</p> <ul style="list-style-type: none"> • Belvedere Garden (North of Block C): 120 sq m • Walled Garden (Proximate to the Chapel/Block D/Block F): 2,631 sq m • Courtyard between Block B and C: 1,563 sq m • Upper Floor Terrace on Block A1: 109 sq m
Internal Communal Facilities	<p>c. 324 sq m provided as follows:</p> <ul style="list-style-type: none"> • Management Suite in Block B (c. 76 sq m) • Gym in Block C (c. 124 sq m) • Co-Working Space in Block C (mezzanine level) (c. 124 sq m)

5.3 Reuse and Demolition of Existing Buildings

This section will detail the existing buildings to be reused/refurbished and demolished at the subject site. The outline of each building element is presented in Figure 5.1 overleaf and detailed descriptions of each building are summarised in Section 3.2 of this Report.



Figure 5.1: Identification of Existing Buildings

(Source: Molloy and Associates Conservation Architects, 2025)

Building C (Tabor House) and D (The Chapel) will be refurbished and repurposed within the proposed development with the remaining buildings to be demolished.

A 2.4-metre-high boundary wall has been provided across the site from east to west between the lands that are being retained by the Jesuit Community (area to the south of the proposed wall), and the surplus lands that have been sold to the Applicant, having been built in 2024.

Early in the design process, studies were carried out in order to ascertain what buildings could be functionally retained and refurbished on the site. It was ultimately considered that Tabor House and The Chapel would be retained and reused in the proposed development and the remaining buildings would be demolished.

The building elements to be demolished were considered for various uses however having regard to the existing limited floor-to-ceiling heights and poor infiltration of daylight to the building grouping for example, in addition to quantum of alterations that would be required which would essentially dramatically alter the appearance of some of the existing fabric, it was concluded that their adaption is was not viable or in the best interests of the overall Masterplan for the site. Please refer to the *Existing Buildings Feasibility* attached as an Appendix to the OMP Masterplan + Architectural Design Statement. Chapter 4 of the EIAR enclosed separately discusses alternative options for the proposed development.

Please see the below summary table which sets out the buildings to be reused and buildings to be demolished:

Building A	Milltown Park House	880 sq m	Demolish
Building B	Milltown Park House Rear Extension	2,031 sq m	Demolish
Building C	Tabor House	1,575 sq m	Refurbish and Reuse
Building D	The Chapel	768 sq m	Refurbish and Reuse

Building E	The Finlay Wing	622 sq m	Demolish
Building F	The Archive	1,240 sq m	Demolish
Link Building between Tabor House and Milltown Park House Rear Extension Located to the Front of the Chapel		74.5 sq m	Demolish



Figure 5.2: Images of Tabor House (Top) and the Chapel (Bottom) to be reused within the development

(Source: Molloy and Associates Conservation Architects, Thornton O'Connor Town Planning, 2025)



Figure 5.3: Images of Buildings to be Demolished as part of the Proposed Development

(Source: Molloy and Associates Conservation Architects, 2025)

The development will include the refurbishment and reuse of Tabor House and the Chapel, and the provision of a single storey glass entrance lobby to the front and side of the Chapel. Tabor House and the Chapel will be repurposed to provide cultural/community space within the scheme. The reuse and refurbishment of Tabor House and the Chapel will allow a new setting to be created in the landscape and the buildings will act as a focal point for the development especially entering the principal entrance from Milltown Road or walking through the pedestrian street from the northern end with glimpses of Tabor House shown through the setback of Block B.

Chapter 7 of the EIAR prepared by Molloy & Associates Conservation Architects states the following:

"The proposal to restore and adapt selective buildings, which are deemed to be both of heritage significance and suitable for purposeful adaptation, has been conceived to minimise the extent of loss across the site as a whole. The works proposed to the buildings selected for reuse, have been designed with the objective of preserving the character of the site and detailed to minimise unnecessary loss. ...the potential for positive impact is inherent in the rejuvenation of the site through the adaptation of existing building fabric of heritage interest, within their setting to an extent, and the provision of new buildings to secure a sustainable long-term use for the site...The retention of two buildings for purposeful re-use within the vast building range presents an inherently positive impact for the legibility of the original function of the site.."

Please see Figures 5.4 and 5.5 which demonstrates the views of Tabor House from the pedestrian boulevard (with the ground floor of Block B designed as a colonnade to ensure glimpses of Tabor House are provided) and the formal forecourt entrance accessed off Milltown Road.



Figure 5.4: CGI Towards Tabor House from the Pedestrian Boulevard

(Source: 3D Design Bureau, 2025)



Figure 5.5: CGI Towards Tabor House, The Chapel and Block F From the Forecourt Formal Entrance Accessed Off Milltown Road

(Source: 3D Design Bureau, 2025)

5.4 Breakdown of Uses & Buildings

The proposed development will provide 562 No. residential units, comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units), cultural/community space, a café/restaurant (179 sq m) and a creche (375 sq m).

As well as the cultural/community within the retained Tabor House and the Chapel, the proposed development will be provided within the following buildings:

- **Block A1** will comprise 81 No. apartment units;
- **Block A2** will comprise 139 No. apartment units;
- **Block B** will comprise 74 No. apartment units and the management suite;
- **Block C** will comprise 151 No. apartment units and a co-working space and gym for the residents of the development;
- **Block D** will comprise 30 No. apartment units;
- **Block E** will comprise 6 No. courtyard type houses; and
- **Block F** will comprise 81 No. apartment units, the creche and café/restaurant.



Figure 5.6: CGI of the Proposed Scheme

(Source: 3D Design Bureau, 2025)

5.5 Building Height & Separation Distances

The proposed height of the development will range between 2 No. and 8 No. storeys, with 2 No. ancillary single storey structures also proposed which will facilitate bike and refuse stores. The breakdown of each building's height is summarised as follows:

- **Tabor House** has an existing height of 4 No. storeys (including lower ground floor level);
- **The Chapel** has an existing height of 2 No. storeys (including lower ground floor level and mezzanine level);
- **Block A1** will range in height from 5 No. storeys to 8 No. storeys;
- **Block A2** will range in height from 6 No. storeys to 8 No. storeys;
- **Block B** will range in height from 3 No. to 7 No. storeys;
- **Block C** will range in height from 4 No. storeys to 7 No. storeys;
- **Block D** will range in height from 3 No. storeys to 5 No. storeys;
- **Block E** will be 2 No. storeys in height; and
- **Block F** will range in height from 5 No. storeys to 7 No. storeys.

The proposed layout has positioned the highest forms at the least sensitive locations throughout the site (fronting Milltown Road and Sandford Road, fronting the large public open space area to the east of the site, and towards the centre and southern portions of the subject lands), at a distance from sensitive residential receptors and behind the substantial tree belt along the northern and eastern boundaries.

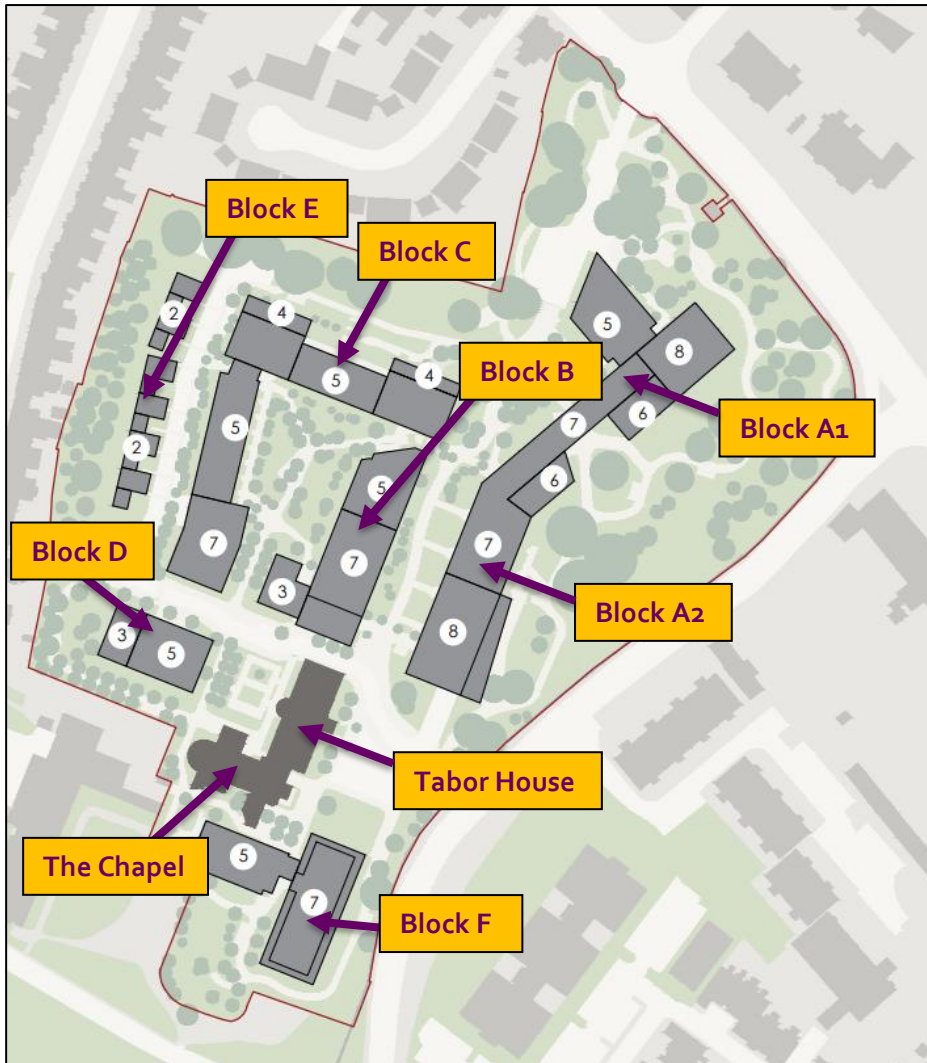


Figure 5.7: Proposed Layout of the Subject Development with the Heights Noted

(Source: OMP Architects, Annotated by Thornton O'Connor Town Planning, 2025)

It is considered that the proposed development strikes a balance between respecting the surrounding context of the site while also ensuring that this prominent strategic site is appropriately densified. Each block has a subtle shift in direction as a response to its particular urban condition.

The *Masterplan & Architectural Design Statement* prepared by O' Mahony Pike Architects notes the following in relation to building heights at the subject site:

"Height Baseline - Design strategy is to establish baseline height of 5 storeys within the centre of the scheme which, depending on the contextual edge condition and degree of separation, steps up or down 2 storeys.

Anchor buildings - These elements of 7-8 storeys provide accent and variation at either end of the axial route between the forecourt and the plaza which enhances legibility, wayfinding and connectivity.

Urban Marker - *The proposed 8 storey 'urban marker' acts as a reference point within the local area to enhance legibility and placemaking by announcing the development sitting within an expansive site which is otherwise concealed from the wider community behind an existing 3M high perimeter wall and existing mature tree belt.*

Placemaking - *The location of this urban marker responds to the wider context and urban morphology by marking the key junction and transition between the merging neighbourhoods of Milltown, Ranelagh, Clonskeagh and Donnybrook. The design intent, massing and orientation of this building specifically responds to the view South from this junction on Eglinton road creating an elegant 'punctuation mark' as the building extrusion emerges at a suitable height above the horizontal 'green veil' around the perimeter of the site along the North and East edges. As such, at the neighbourhood scale it acts as a 'reference point' in the landscape.*

Emerging Context - *A taller building in this location it will add interest to the skyline and provide a visual reference point. While the site is on the periphery of the City Centre, it is in an area of emerging urban character with substantial developments to the South and East.*

Green Belt - *This urban marker addresses the flow of the park as it winds it way around the North/ East corner while also signifying the wide 3 storey pedestrian archway connection between the park and the central plaza space. With the exception of the urban marker the rest of the development will be below the height of the existing mature tree belts which are retained and provide a 'green veil' to the perimeter of the site along the North and East edges."*

It is our opinion that the careful modulation of height throughout the site responds to the situational context of each individual block provided in the subject development. The proposed heights are appropriate having regard to the expressed requirement in National level policy to achieve compact growth and have also respected the surrounding context by providing large separation distances. A key priority throughout the design process was to provide appropriate transitions from the 2 No. and 3 No. storey residential dwellings along Cherryfield Avenue Upper and Lower to the west and along Norwood Park to the north. In this regard, 2 No. storey courtyard-type houses have been provided along the western extent of the site, with a minimum separation distance of c. 30-metres provided from the adjacent dwellings on Cherryfield Avenue Upper and Lower.

In addition, large setbacks of between c. 32.5 metres to c. 50 metres have been provided between the Norwood Park dwellings and the part 4 No. to part 5 No. storey elements of Block C, with larger separation distances provided from the 7 No. storey pop-up element of Block C, as demonstrated in Figure 5.8. Figure 5.9 also demonstrates the inset provided along the north of Block C as it transitions from 4 No. storeys to 5 No. storeys.

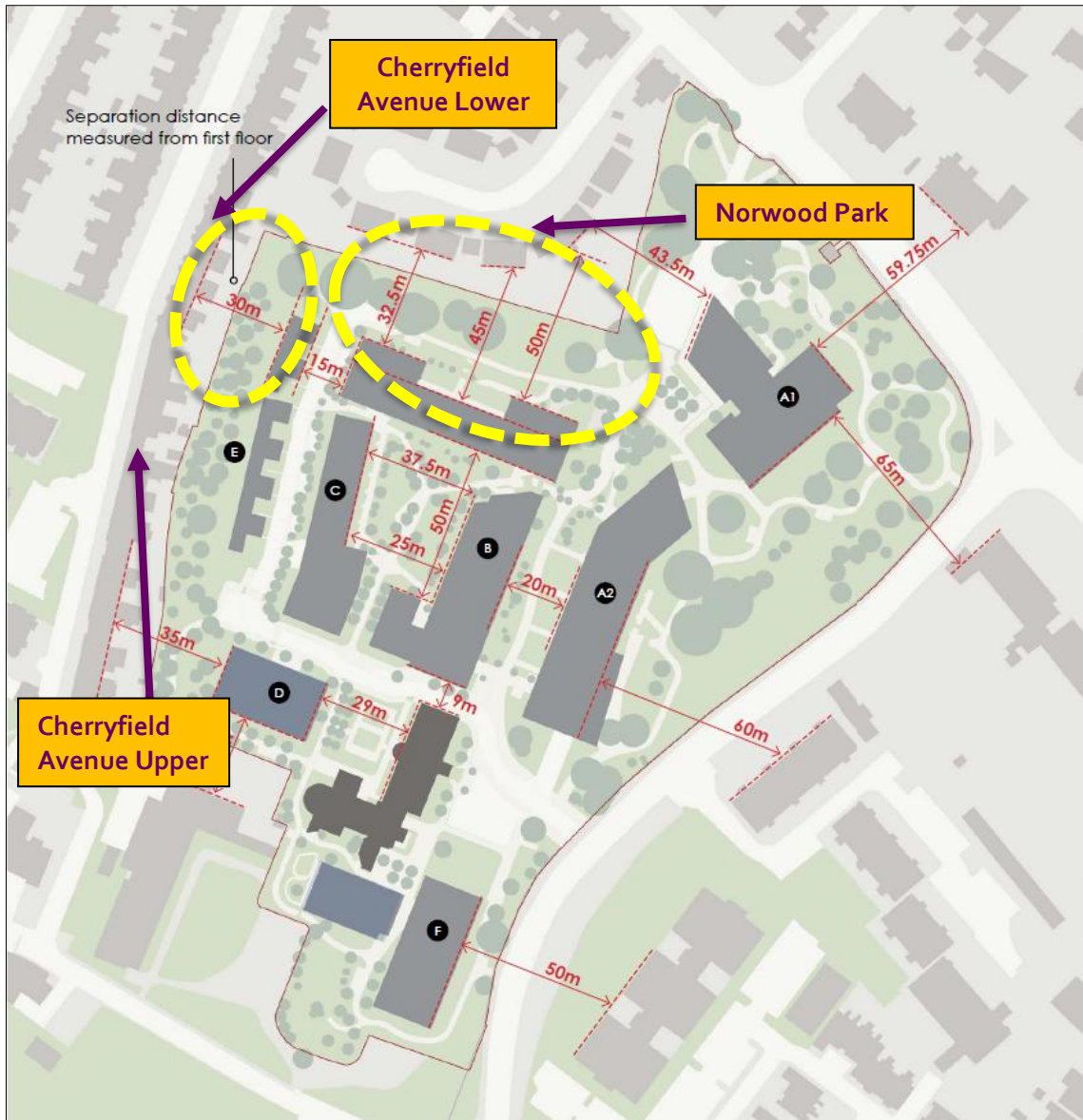


Figure 5.8: Separation Distances Proposed with Large Setbacks from Block C and 2 No. Storey Courtyard Houses in Block E Highlighted

(Source: OMP Architects, Annotated by Thornton O'Connor Town Planning, 2025)

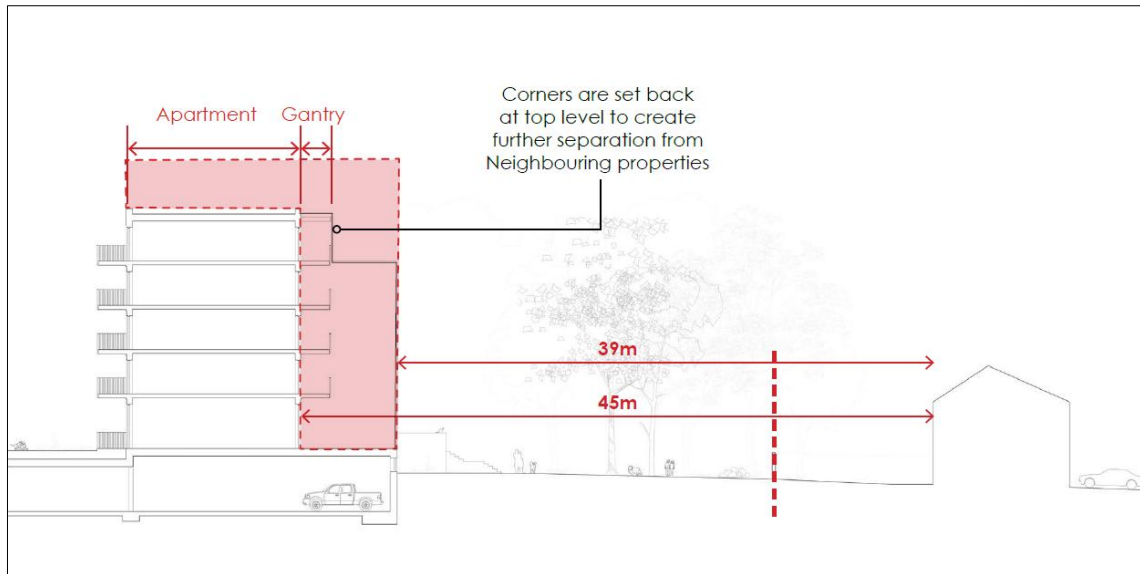


Figure 5.9: Inset Provided to the North of Block C

(Source: OMP Architects, 2025)

Furthermore, Block D proposes heights of 3 to 5 No. storeys with the 3 No. storey element positioned adjacent to the neighbouring dwellings on Cherryfield Avenue Upper to provide an appropriate transition.

Block F to the south of the site ranges in height from 5 No. to 7 No. storeys and has been set back from the remaining Jesuit lands. This boundary between Block F and remaining Jesuits lands has recently been provided with a new 2.4-metre-high boundary wall as part of a previous application which sought to separate the Applicant's lands from the remaining Jesuit lands.

The scheme then transitions in height along the eastern boundary with Block A₁ ranging in height from 5 No. to 8 No. storeys and Block A₂ ranging in height from 6 to 8 No. storeys. The 8 No. storey elements will act as focal points to improve legibility and wayfinding for the wider area and internally within the site.

The *Landscape and Visual Impact Assessment* prepared by Modelworks (Chapter 9 of the separately enclosed EIAR) notes the following in relation to Block A₁:

"The intention is to take advantage of the building's separation distance from neighbouring properties/sensitivities (due to the set-back behind the woodland belt) and the screening provided by the trees/woodland, to achieve density and also mark the junction of Sandford Road and Milltown Road with the eight storey accent volume."

The presence of the tree belt will reduce the visual impact of the building while also ensuring that it improves the place-making and legibility for the area.

The following is also set out in the *Landscape and Visual Impact Assessment* in relation to the proposed built form at this prominent junction:

"The junction of Sandford Road, Milltown Road, Clonskeagh Road and Eglington Road funnels traffic from three urban cores, i.e. Clonskeagh/UCD, Milltown and Donnybrook, towards the city centre via Ranelagh. The site occupies the most prominent of the four

quadrants around the junction. Due to a number of factors, including the non-orthogonal configuration of the junction, the absence of buildings at the corner of the site, and the wall and trees along the site boundary, the junction does not manifest as a distinct 'place' in the townscape. Despite the large houses and trees around the junction it does not figure clearly in people's mental map of the area and does not contribute positively to legibility.

The junction as a place, and the streets to which the site has frontage, warrant greater emphasis in the townscape – to give better definition to the junction locally, and to improve the legibility of the urban structure. This can be achieved only by built form on the site (the other quadrants around the junction all being already developed). However, the site's main landscape asset, the belt of trees inside the boundary, is a constraint to development that would seek to address the roads and junction. Any building in the corner must be set back behind the trees. It is only through substantial height that a building on the site will achieve the dual objective of place-making and legibility."

In addition, internal separation distances are proposed as follows between the blocks:

- 25 – 50 metres between Blocks B and C in the internal courtyard;
- 20 metres between Blocks A2 and B;
- 15 metres between Blocks C and E; and
- 29 metres between Tabor House and Block D.

It is our professional planning opinion that the proposed heights of part 2 to part 8 No. storeys across the site cannot be considered challenging on this core urban site. It is clear that the Design Team has comprehensively considered the height of the blocks within the proposed development as the modulation of height throughout the site responds to the situational context of each block within the site. The 8 No. storey elements are key features of the proposed scheme in terms of its role in wayfinding for the local area and internally in the site. It will act as a focal point for the scheme having regard to its position at a prominent junction at the edge of 4 No. key suburbs. Furthermore, taller heights were considered acceptable in previous applications at the subject site.

Please see the *OMP Masterplan + Architectural Design Statement* for further details on the Height and Layout Strategy for the proposed development. The *OMP Masterplan + Architectural Design Statement* states the following in relation to the massing strategy and also details various massing studies which have resulted in the current layout proposal, including a focus on providing a public park and enhancing permeability:

"From the outset we investigated the relationship between the existing woodland park to the East and our proposal, looking to enhance connectivity between the park and the internal public square while improving permeability through the site. We also opened the site to provide a public short-cut along the natural desire line from the new Milltown entrance to Ranelagh Village via this parkland edge and exiting through the existing entrance at Sandford Road.

The expansive 3 storey archway through the linear building which connects the internal public square to the parkland denotes the significance of the mature blue cyprus tree at the intersection with the tree belt. Block A was designed in direct response to this signature tree whereby the cranked geometry of the building and location of the archway combined to celebrate this interface and provide for a strong connection between the architecture and landscape design.

We explored the building in section, studying the views into the tree belt from the apartments at various heights, we also created setbacks in the building form at high level to create wider private terraces, availing of the mature tree belt and this rich amenity space.”

Figure 5.10 below demonstrates the massing strategy for Block A.

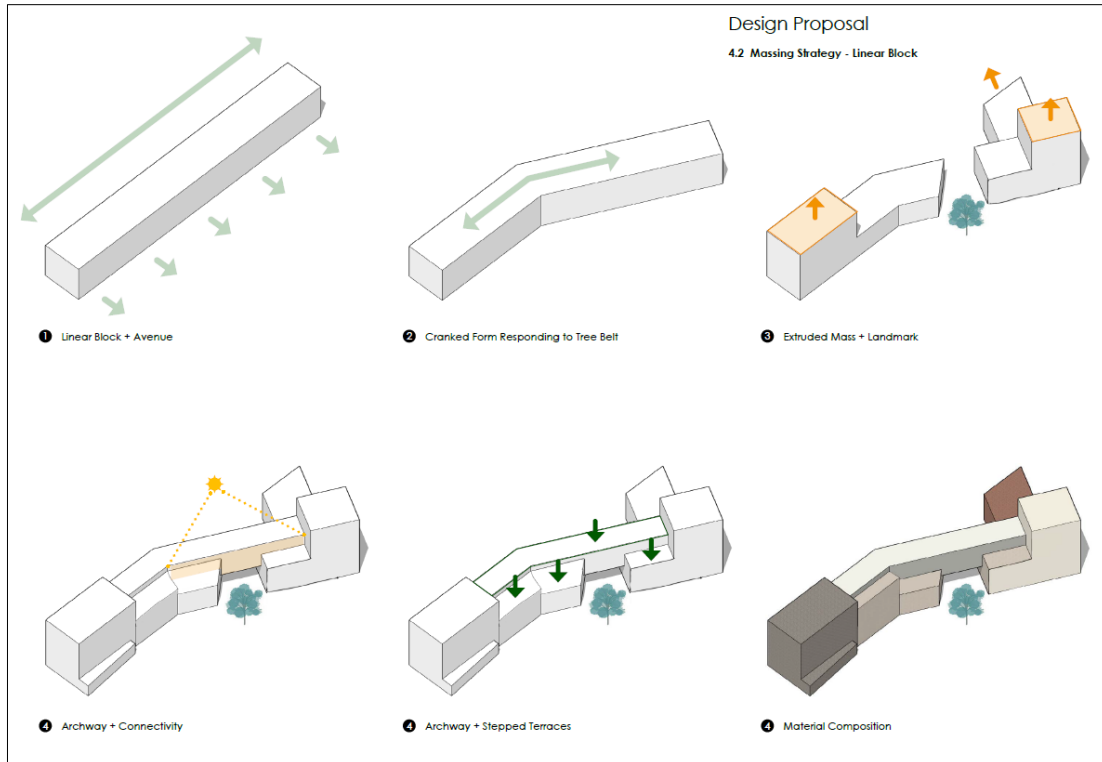


Figure 5.10: Block A Massing Strategy

(Source: O’ Mahony Pike Architects, 2025)

The massing strategy for the area surrounding the existing buildings, which are proposed to be reused and refurbished (Tabor House and Chapel), is provided in Figure 5.11.



Figure 5.11: Existing Buildings Massing Strategy

(Source: O' Mahony Pike Architects, 2025)

To conclude this section, it is clear that the Design Team has comprehensively considered the massing and modulation of the blocks within the proposed development. It is our professional planning opinion that the proposed heights of part 2 to part 8 No. storeys across the site cannot be considered challenging on this large site. The modulation of height throughout the site responds to the situational context of the site. The 8 No. storey elements are key features of the proposed scheme in terms of its role in wayfinding for the local area and internally in the site and will act as a focal point for the scheme having regard to its position at a prominent junction.

The publication of the *National Planning Framework First Revision (2025)* ("NPF") and the *Urban Development and Building Height Guidelines for Planning Authorities, December 2018*, ("*Building Height Guidelines*") both encourage the provision of increased height and increased density in appropriate locations in order to create a more consolidated urban form and counteract urban sprawl as detailed extensively in Section 7.0 below. In addition, we reiterate that taller heights than those proposed were granted in the previous SHD and LRD 1 applications.

5.6 Density

The subject application proposes 562 No. units on a developable site of c. 4.26 hectares. Having regard to the formula provided in Appendix B of the *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)*, which is detailed in Section 6.8 below, the proposed net residential density is calculated as follows.

Stage	Metric	Calculation	Figure
A	Net Site Area (sq m)		42,547
B	Total GFA (sq m)	C+D	50,196
C	Residential GFA (sq m)		47,247
D	Non-Residential GFA (sq m)		2,949
E	Residential GFA as Proportion of Total GFA (%)	C/B	94.1%
F	Pro Rata Site Area (sq m)	AxE	40,047.38
G	Number of Dwellings		562
H	Net Residential Density (dph)	G/F/10000	140.3

Table 5.1: Net Residential Density of the Proposed Development

(Source: **Table Generated by Thornton O’Connor Town Planning (2025), based on the Formula Provided in Appendix B of the *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, 2024***)

The proposed density of 140 No. units per hectare on this core urban site is not challenging on the subject site, especially as the site can accommodate the proposed density due of the extensive quantum of public and communal open space provided. The An Coimisiún Pleanála Inspector noted the following in their assessment of a higher density under the SHD at the site, which proposed a density of 157.5 units per hectare:

"This is the right location for new housing in Dublin City at an appropriate height, the right quantum and at an efficient residential density."

Furthermore, under the LRD 1 application, the Planning Officer remarked the following in relation to the proposed residential density of 149.8 units per hectare:

"The density is considered to be suitable given its location and it is noted that the site is within walking distance to Luas and a number of bus routes."

It is clear that National policy supports higher density development on core urban and well serviced sites in order to ensure that prime underutilised lands are appropriately densified.

5.7 Design Rationale

The *Masterplan + Architectural Design Statement* prepared by OMP Architects and the *Landscape Design and Access Statement* by Cameo and Partners Design Studio are enclosed as separate documents, which set out the high-quality design of the scheme which has comprehensively considered the surrounding context while appropriately densifying this underutilised accessible site.

5.7.1 Materials

As set out in the *Masterplan + Architectural Design Statement* prepared by OMP Architects, the primary material context of the development is brick (buff/brown, red/brown and grey). The following description of materials is provided:

"Both the historical and contemporary context heavily rely on brick as the predominant building material, with a wide variety of colours and types reflecting the piecemeal

development of the area over a prolonged period of time. Although alternative materials have been explored, brick feels a natural choice for the base material for our proposal.

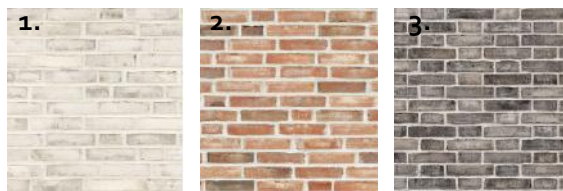
It is our intention that through considered sampling and selection, brickwork for the body of the buildings will bring a domestic, softened and textural quality to the building, whilst also echoing character traits of its context in the area.

However the three main contextual conditions surrounding Sandford Road are broadly coherent in three broad hues:

Buff/Brown Brick, reflecting the predominant brick type along Ranelagh Road, as well as working with the painted render St James Terrace. This colour choice also responds to the sites Tabor House & Chapel buildings.

Red/Brown, reflecting the predominant use of red along Eglinton Road, Sandford Road & Belmont Avenue.

Grey Brick, referencing the harder facing base and edge stone which is apparent on the historical housing façade typologies to create a hard wearing street interface plinth.



The completed building expression provides a simple building form that reinterprets the surrounding building fabric to relate positively to neighbouring structures and create a harmonious whole.

The architecture of each building varies enough to ensure a diverse and interesting urban fabric, albeit within a considered palette of complimentary materials and colours.

Subtle variations in the architectural expression and material palette of the different blocks to ensure a diverse and interesting urban fabric, albeit within a considered palette of complementary materials and colours that provide a degree of variation and interest as the building forms progress and relate to the different surrounding conditions."

It is clear from the detailed *Masterplan + Architectural Design Statement* submitted with this planning application that high-quality materials that respond to their context have been proposed for the subject scheme.

5.7.2 Community / Cultural Space and Resident Amenity

The development will provide high-quality cultural/community space within the refurbished and converted Tabor House and Chapel (net area = c. 1,698 sq m). In addition, an external pavilion ('Secret Garden') to the rear of Tabor House and the Chapel will also be provided which measures c. 248 sq m, totalling c. 1,946 sq m of cultural/community space (5.1%). The pavilion/secret garden to the rear of Tabor House will represent a natural extension to the proposed cultural/community space which can host a variety of events for the community.

Key Point: While the entirety of Tabor House and the Chapel will be re-used and refurbished to provide cultural/community space, we note that the net floor area of the buildings is identified as dedicated cultural/community space. This is due to the use of some of the rooms/spaces within the retained buildings as ancillary to the overall cultural/community use, rather than actual useable space.

To avoid any confusion, the following provides a summary of the existing and proposed gross floor area and proposed net floor area of Tabor House and the Chapel:

- 1) Existing Gross Floor Area: **2,343 sq m**
- 2) Proposed Gross Floor Area: **2,395 sq m (includes proposed new entrance lobby to Chapel)**
- 3) Proposed Net Floor Area: **1,698 sq m**

The *Masterplan + Architectural Design Statement* prepared by OMP notes the following in relation to the cultural/community spaces:

"The retention of the Chapel and Tabor house buildings were central to our masterplan from an early stage, creating a focal point for this new neighbourhood.

There are many potential uses for the retained buildings, for example, the Chapel could house the main Cultural hub for the new development with an impressive 'great hall' on the first floor which could be used for a number of activities from performances, screenings to local community gatherings or simply somewhere to lounge and relax.

While the lower level could provide a number of different sized rehearsal spaces with the flanking rooms converted to changing rooms, showers and a small kitchen facility which could support any events or gatherings above in the 'great hall'.

Tabor House also lends itself to many potential uses, it could for example contain studio spaces design to house a variety of dancers, musicians and artists. The cultural accommodation that could be housed in Tabor House would be split across the four levels; with the ground floor dedicated to dance and performance rehearsal spaces, the first floor recording / practice rooms for musicians and the top floors will be house a collection of artist studios, creating a hierarchy of program across the levels. This lower level also has the potential to connect to the secret garden to the rear of Tabor house which will be planted as an edible garden with natural produce ranging from fruit bearing shrubs, herb gardens and a variety of fruit trees, such as apple, pear and plum."

The above strategy for the cultural/community spaces is the Design Team's initial consideration, but the specific use and layout of these cultural/community spaces will be agreed with Dublin City Council via compliance post-planning. This is considered a reasonable approach as it will be c. 2-3 No. years by the time planning permission is secured and the scheme is constructed. An appropriate end-user(s) will be found for the spaces at that juncture.

Furthermore, internal residential communal amenity space is provided at ground floor of Block B and ground and mezzanine level of Block C (324 sq m), comprising a co-working space, a gym and a management suite.

The management suite (76 sq m), located in Block B, will serve the residents needs from parcel delivery to repairs and welcome residents from the Milltown Road entrance. Opening onto the green avenue from Block C just off the northern plaza, a gym (124 sq m) is provided on the ground floor and a co-working space (124 sq m) is provided on the mezzanine level. Centrally located, these amenity spaces will help to animate the ground floor.

The development also includes an upper level communal terrace (109 sq m) on the sixth floor of Block A1, positioned to take advantage of long, open views across the development.

It is clear that a wide range of high-quality cultural/community spaces, amenities and facilities are proposed within the subject scheme.

5-7.3 Creche

The proposed development will provide a crèche (375 sq m) within the ground floor of Block F and will cater for c. 75 No. children. This crèche will contain 5 No. classrooms and includes a dedicated open space area (244 sq m) for staff and children to utilise.

The *Community and Social Infrastructure Audit (incl. Schools and Childcare)* prepared by Thornton O'Connor Town Planning remarks that *"the analysis of existing capacity indicates a robust demand for additional childcare places. Given the childcare demand generated by the proposed development, its unit typology, alongside the shifting age and demand profile, it is considered that an additional childcare facility would be a favourable addition to the area"*. Accordingly, the Applicant has incorporated a crèche into the scheme, which will benefit the future residents of the development, but will also cater for the immediate existing residents of the area and thus will greatly enhance the amenity of the area.

3-7.4 Café/Restaurant

It is proposed to provide a café/restaurant (179 sq m) within the ground floor of Block F, introducing an additional commercial element to the development. The café/restaurant addresses the forecourt adjacent to the Milltown Road entrance and will serve to further invite the public into the site and activate the public realm at ground floor level. Public open space will be provided in the forecourt fronting the proposed café/restaurant.

5-7.5 Landscape Strategy

We reiterate that the application lands have always been in private use and have thus been closed off from the general public. Therefore, the landscape strategy for the site will completely open up the site as a public amenity for the first time. A *Landscape Design and Access Statement* has been prepared by Cameo and Partners Design Studio and is enclosed separately with this planning application. This document sets out in detail the open spaces provided throughout the site and notes that:

"The design philosophy for the proposed new residential-led mixed-use scheme in Sandford aims to create a high-quality residential community with a splendid and unique, contemporary landscape design within a parkland setting which is cognisant of the historical context of the site and its notary buildings."

The Report notes that an overarching aim of the proposed development is to create a new residential development integrated within the existing landscape setting of the site through a series of connected landscape character areas.



Figure 5.12: Extract of Ground Floor Illustrative Landscape Masterplan

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.13: Aerial View of the Proposed Development Demonstrating the Green Emphasis of the Scheme

(Source: 3D Design Bureau, 2025)

Public Open Space

The *Landscape Design and Access Statement* outlines the various character areas proposed within the development with a particular focus on the 25% public open space requirement of the Z12 zoning pertaining to the lands.

The public open space is provided as follows:

- **Public Park and Plaza Area Connected Through the Triple Height Undercroft of Block A1:**
 - c. 10,879 sq m (c. 25.57% of the c. 42,547 sq m developable site area)
- **Additional Public Open Space:**
 - **Woodland Glade**
 - **Boulevard**
 - **Garden Café Area**
 - c. 4,144 sq m (c. 9.74% of the c. 42,547 sq m developable site area)

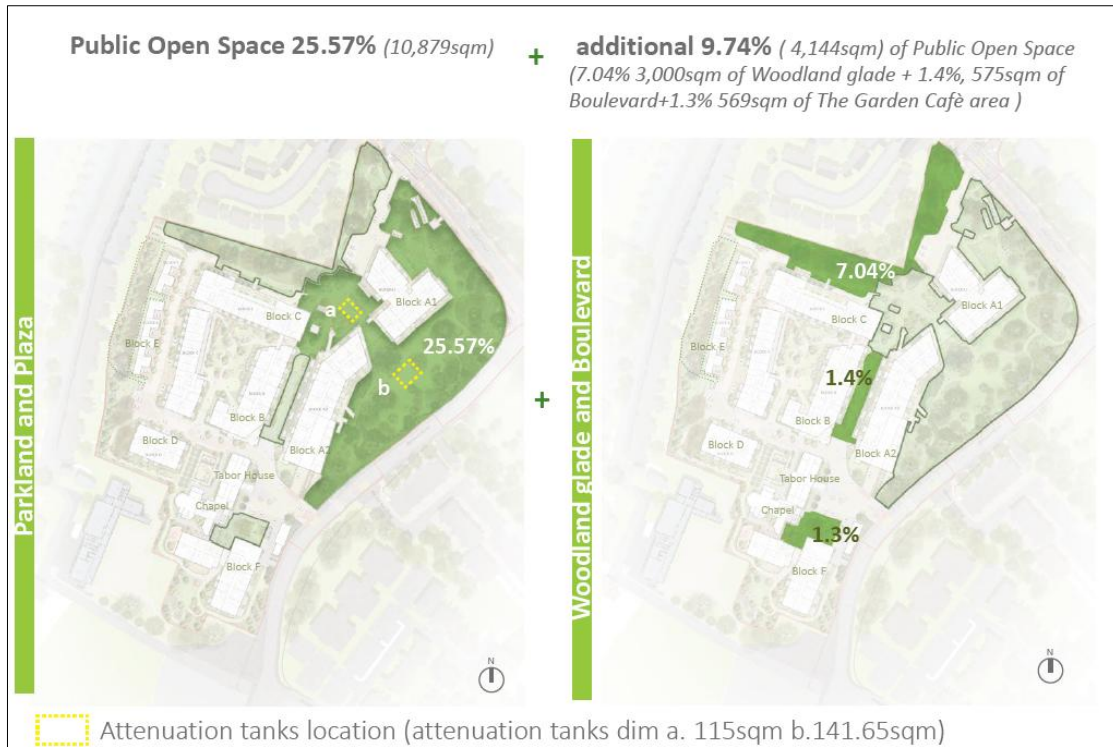


Figure 5.14: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.15: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2025)

Therefore, a total of 15,023 sq m (c. 35.3% of the developable site area) has been designated as public open space which significantly exceeds the requirement under the Z12 zoning objective to provide 25% public open space.

The majority of this space (25.57%) will be provided in the eastern parkland and the plaza area, which are linked through the triple height undercroft of Block A1.

We note that the large public park along the eastern boundary of the site is currently significantly overgrown and this space will be transformed by the subject development and will become a significant public amenity for the area. The opening up of the area, while maintaining a woodland feel, will allow access to the general public for the first time. The imposing boundary wall will be modified, principally along Sandford Road, to provide views into the site which will invite the public into the open spaces provided and will improve permeability in the area.

The proposed development will remove all Category U¹⁷ trees. The proposed development will necessitate the removal of 58 No. Category C¹⁸ trees. Additionally, 54 No. Category C trees are recommended for removal to allow for an improved woodland structure. The provision of a high quality useable public park available to the wider community at the site will be a significant planning gain for the area (as the public have never enjoyed any right of access to these privately owned lands).

The public park links through the triple height undercroft of Block A₁ to the plaza area. There will be no vehicular access allowed to the plaza area, through the provision of bollards, thus ensuring the provision of a high-quality public space.

In addition to the public park and the plaza area connected through the undercroft of Block A₁, a parkland walk (known as the Woodland Glade) will also be provided to the north of Block C, which is positioned adjacent to the plaza and the communal amenity space in Block C. This northern space represents c. 7.04% of the site area (or c. 3,000 sq m) and will provide further amenity on site in excess of the 25% requirement. The Woodland Glade will be presented as a wildflower meadow and will work together with the park and plaza as an entire connected public open space. In addition to utilising the eastern public park to travel through the site, the public can also utilise the pedestrian connection from Milltown Road and Sandford Road through the pedestrian boulevard (575 sq m or 1.4% of site area) between Blocks A and B. Additional public open space (569 sq m or 1.3% of site area) will be provided, fronting the café/restaurant within Block F.



Figure 5.16: CGI of the Proposed Transformed Public Park

(Source: 3D Design Bureau, 2025)

¹⁷ Trees in such condition that any existing value would be lost within 10 years and which should, in the current context, be removed for reasons of sound arboricultural management. Trees that are dead, dying or showing immediate and irreversible decline. (CMK, 2025)

¹⁸ Trees of low quality and value (a minimum of 10 years). (CMK, 2025)



Figure 5.17: Illustrations of the Proposed Transformed Public Park

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.18: Illustrations of the Triple Height Archway Linking the Public Park and the Plaza Area (see Top Left Image Showing Bollards to Prevent Access to Plaza)

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.19: Illustrations of the Plaza Area

(Source: Cameo and Partners Design Studio, 2025)

Natural play facilities for the scheme will be mainly focused within the public open space, specifically aimed at children to reconnect with nature and there will also be opportunity for adult engagement through natural gym equipment. There will also be seating provided throughout the site.



Figure 5.20: Examples of Public Open Space Features

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.21: Illustrations of the Woodland Glade to the North of Block C

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.22: Illustrations of the Pedestrian Street Linking the Milltown Road Entrance to the Public Plaza and Beyond to Sandford Road

(Source: Cameo and Partners Design Studio, 2025)

Therefore, it is clear that the proposed layout has comprehensively considered the public open spaces within the scheme. These spaces will be high-quality and will provide a place to meet, sit, exercise or to walk or cycle through, which is currently not an amenity available at the lands, as the site has always been in private use.

Communal Open Spaces

The total communal open space proposed at ground floor level is 4,314 sq m (10.1% of the developable site area) and is provided as follows:

1. Belvedere Garden (North of Block C): 120 sq m
2. Walled Garden (Proximate to the Chapel/Block D/Block F: 2,631 sq m
3. Courtyard between Block B and C: 1,563 sq m

Please see extract below from Dwg No. Co111 L900 prepared by Cameo and Partners Design Studio, which demonstrates the communal open space at surface level (combined with the public open space provision, private open space (creche playground) and upper level amenity terrace).

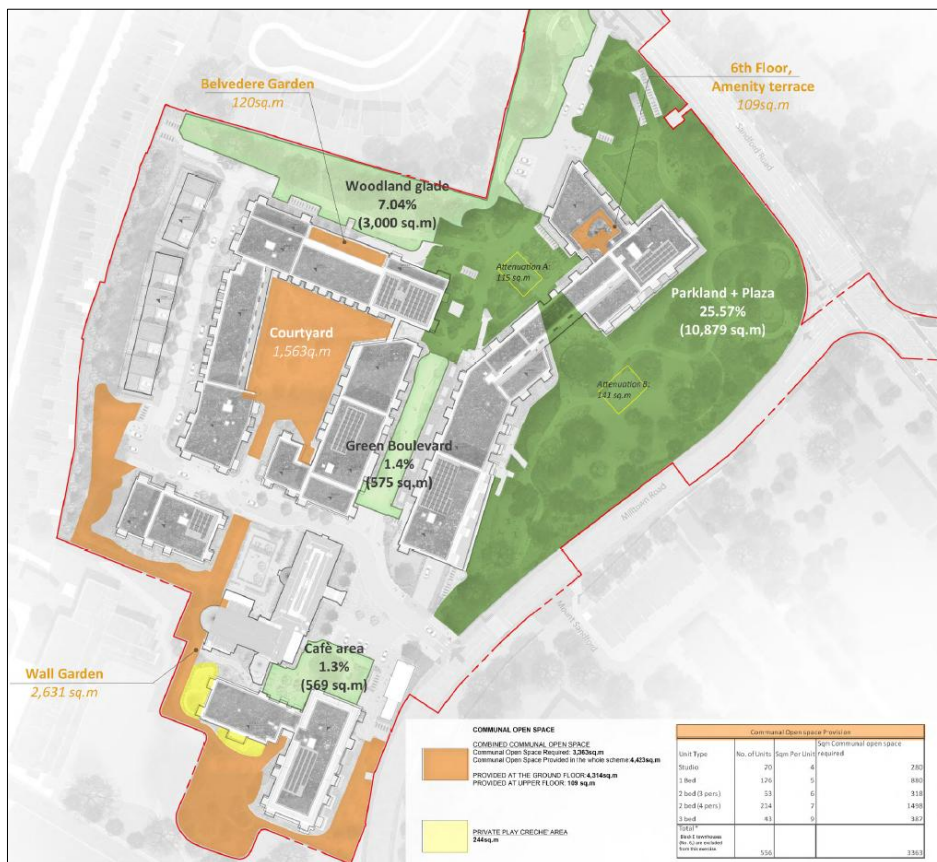


Figure 5.23: Open Space Provision at the Application Site

(Source: Cameo and Partners, 2025)

Examples of the landscaped communal areas are provided overleaf.



Figure 5.24: Illustrations of the Belvedere Garden to the North of Block C

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.25: CGI of the Courtyard Between Blocks B and C

(Source: 3D Design Bureau, 2025)

In addition, there will be a communal amenity terrace (109 sq m) on the 6th floor of Block A₁, which will further add to the communal space provision within the proposed development.

It is clear that the open space proposed has been central to the design of the development and will contribute to the assimilation of the development within its surrounding context, particularly having regard to the total provision of public and communal open space proposed.



Figure 5.26: Illustrative Images of the Communal Amenity Terraces Proposed

(Source: Cameo and Partners Design Studio, 2025)

Proposed Boundary Treatment and Access Arrangements

The subject development proposes a new vehicular and pedestrian access point from Milltown Road, which will be the principal entrance to the subject development and which will facilitate access to the basement car park, the forecourt adjacent to Tabor House and the courtyard houses along the western boundary (Block E).

Some 2 No. new pedestrian gates will be provided at the Sandford Road entrance, whilst 2 No. pedestrian access points will be provided at the Milltown Road entrance. In addition, a new pedestrian gate will be provided at the junction of Milltown Road and Sandford Road which demonstrates that ample permeable opportunities are provided in the proposed development.

The existing stone wall will be predominantly retained along Milltown Road. At the corner of Milltown Road and Sandford Road, in addition to the primary frontage to Sandford Road, it is proposed to provide an upstand wall and railing in lieu of the existing cement render wall, which will allow views into the site and will thus visually open the site up to the public, enhancing legibility in the area. Along the remaining boundary of Sandford Road, it is proposed to replace the existing cement rendered wall with a granite wall. The existing vehicular and pedestrian entrance will be retained along Sandford Road, however, the existing pedestrian gates will remain closed and 2 No. new pedestrian entrances will be provided in their place. Along the western boundary, it is proposed to provide a 1.8m high timber fence with concrete post and evergreen hedge planting at its base, confined within the land in the ownership of the Applicant. The existing neighbouring boundary will not be impacted in any way. Cameo and Partners Design Studio have developed a strategy for the boundary treatment as shown below in Figure 5.27.

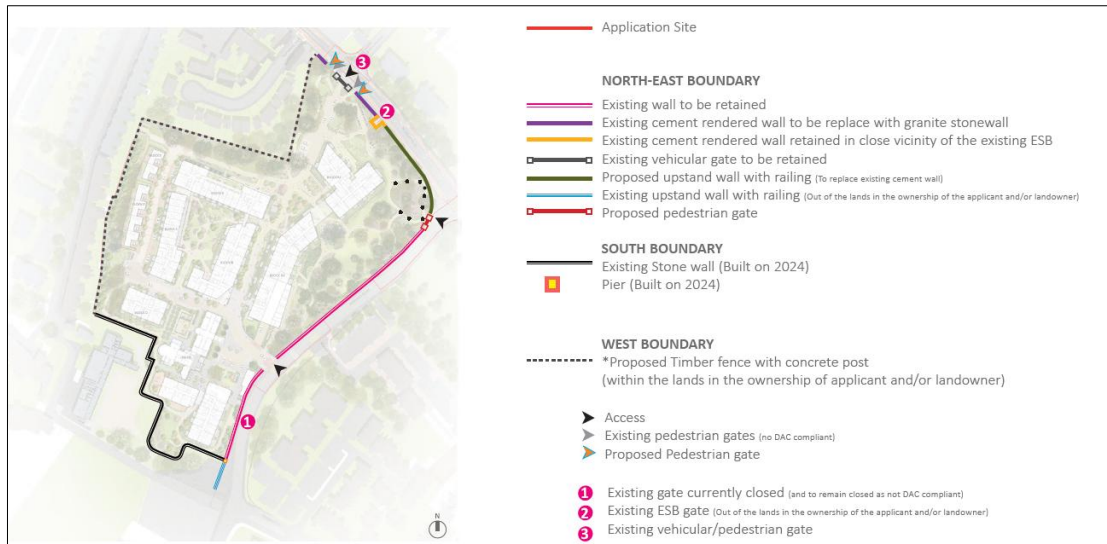


Figure 5.27: Boundary Treatment Strategy

(Source: Cameo and Partners Design Studio, 2025)



Figure 5.28: Extract of the Elevation of the Proposed Boundary Treatment Along Sanford Road

(Source: Cameo and Partners Design Studio, 2025)

We note that the incorporation of permeable visual connections through the site and enhanced boundary treatments were a key consideration during the design process leading to greater public use of the space and represents a key planning gain for the wider community.

5.8 Trees

The *Arboricultural Assessment & Impact Report* prepared by the CMK Horticulture & Arboriculture Ltd and enclosed as a separate document with this planning application assesses the condition of the tree vegetation within the site and any impacts that may occur as a result of the proposed development. The Report is accompanied by a Tree Survey and Constraints Plan, Tree Protection Plans and Impact Assessment Plans.

Some 252 No. trees are proposed to be removed with the remaining 135 No. to be retained. Details of the proposed removal and retention of trees is provided in the image below.

Category	NUMBER AND % OF CATEGORY TO BE REMOVED	NUMBER AND % OF CATEGORY TO BE RETAINED
A	4 / 18%	18 / 82%
B	85 / 43%	111 / 57%
C	112 (54 removed for improved woodland structure) / 95%	6 / 5%
U	51 / 100%	0 / 100%

Table 7 - Impact and Retention of Categories

Figure 5.29: Table Indicating the Impact and Retention of Trees as a Result of the Proposed Development

(Source: CMK Horticulture & Arboriculture Ltd, 2025)

The Report notes the following in relation to tree removal:

"The proposed development will necessitate the removal of 147 trees directly. A further 54 category C trees are recommended for removal to allow for greater provision of open space areas. These are trees with poor physiologies that are competing with trees of higher quality and are not suitable for retention within areas that are going to be used frequently by pedestrians. Their removal would be recommended in the interest of improving the conditions of the higher quality trees independent of the development, though they can not be placed in category U as they are not technically dying. The highest impacted categories are Category C and Category U (table 7). There is a lesser but moderate impact on category B trees. 43% of the site's category B trees will require removal for the development. The smallest impacted category is category A with only 4 specimens to be removed (18%)."

Providing rationale for the removal of 54 No. Category C trees, the Report remarks:

"Currently the eastern area is dominated by self-seeded specimens (categories C & U) many of which are drawn up for light and poorly formed as a result. The very high density of trees, which is the result of limited management interventions, restricts light from penetrating the canopy thereby reducing the diversity potential of the ground flora and also the area's overall habitat and recreational potential. The management objective here is to remove the low value trees (categories C & U) whilst retaining better-quality specimens (categories A & B) with the aim to open up this area to increase light penetration to improve the overall ecological and recreational potential of the area."

Proposed new tree planting is contained within the accompanying landscape drawings by Cameo & Partners Design Studio (some 230 No. new trees are proposed to be planted), enclosed separately as part of this planning application. The *Landscape Design and Access Statement* prepared by Cameo and Partners notes that:

"The trees that will be removed will be replaced by a significant number of large and medium size trees that will have a greater long term benefit to local ecology and biodiversity. Our design will include native species trees and shrubs. Ground cover and understory layer will be set out to maximise local habitats for roosting birds and mammals. Proposed planting

will be set-out to encourage and support the local bee and insect families. This too will include planting which supports berry, nuts etc for other mammals."

As a concluding note on the impact of trees as a result of the proposed development, the Report provides the following:

"The impact on the site's trees from a numbers perspective is relatively high. However, the quality and conditions of the majority of the trees to be removed is generally low (categories C & U). A total of 82% of the very high value (category A) trees are to be retained with 57% of the moderate value (category B) trees retained and integrated into the proposed development. Mitigation planting is proposed to offset the loss of trees."

Therefore, we submit that a key tenet of the proposed scheme has been to provide maximum protection to any trees worthy of retention within the subject lands while also benefiting the recreational potential of the site.

Some 10 No. bat boxes will also be installed on trees within the site and 10 No. bird boxes will be installed.

In their assessment of the SHD Application, the An Bord Pleanála Inspector noted the following in relation to trees:

"I find the landscape design to be thorough and well thought out, with a combination of active and passive spaces. I note how the overall landscape design has exploited mature trees to their fullest by the creation of a wide buffer to the north of the site and a generous and well dimensioned space to the east along Milltown Road. Whilst the loss of 283 trees out of a total of 404 existing trees classified as moderate to good, may seem excessive. I am satisfied that the best and most well positioned trees will be retained (121 in total, mostly category A) and when combined with 238 large/multi stemmed tree, these will contribute significantly to how the proposed development will be successfully integrated." [Our Emphasis]

5.9 Roadworks

The proposed development includes road works on Sandford Road and Milltown Road; adjacent to the existing access off Sandford Road and the newly proposed access off Milltown Road.

Milltown Road

The principal access point for vehicles is off Milltown Road, facilitating access to the basement carpark, the forecourt area adjacent to Tabor House and the Chapel, the creche and café/restaurant in Block F, and the courtyard houses along the western boundary. This new access will also facilitate pedestrians and cyclists. A Toucan Crossing is proposed in the vicinity of the Milltown Road access to improve facilities for vulnerable road users.

As detailed in Chapter 10 of the separately enclosed EIAR prepared by DBFL Consulting Engineers, the following principal works consist of:

"Provision of a new vehicle access off Milltown Road (principal vehicle access to the proposed development facilitating access to the basement carpark, the forecourt area

adjacent to Tabor House and the courtyard houses along the western boundary). This new site access shall be a priority junction and serves pedestrians and cyclists.”

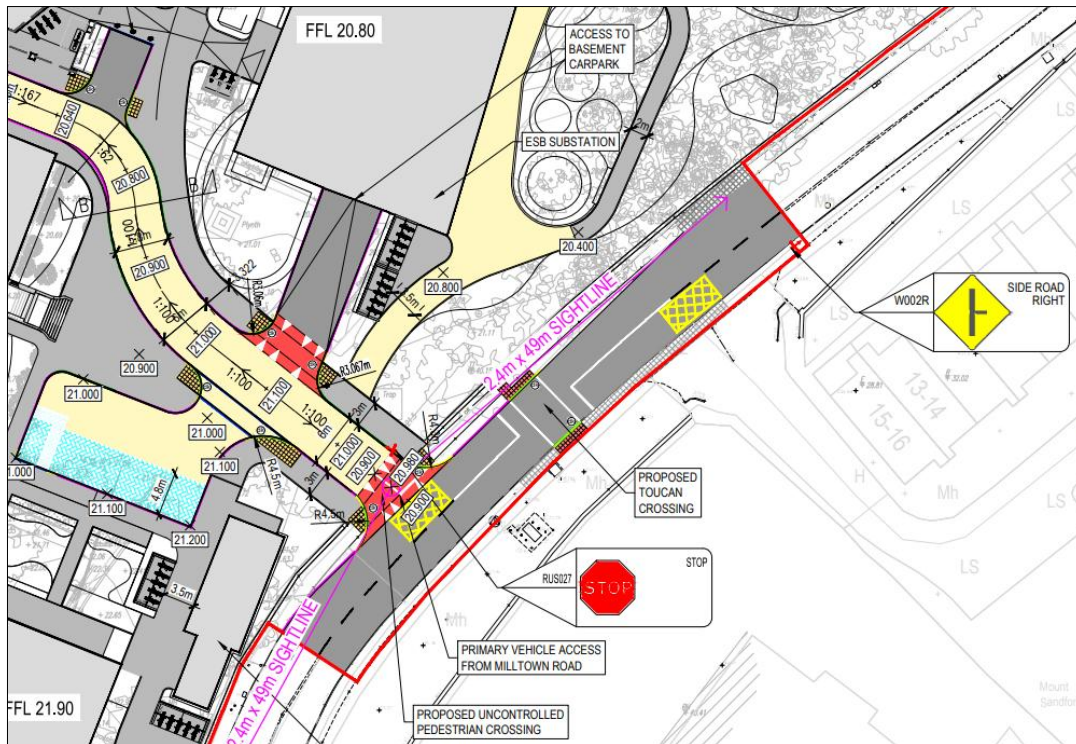


Figure 5.30: Milltown Road Works

(Source: DBFL Infrastructure Design Report, 2025)

Sandford Road

A secondary access point for vehicles is located at the existing entrance from Sandford Road, which facilitates access to the area adjacent to Block A for deliveries, emergency vehicle access, taxi set-down areas and disabled parking bays.

As detailed in Chapter 10 of the separately enclosed EIAR prepared by DBFL Consulting Engineers and enclosed separately, the following principal works are proposed:

“The existing entrance on Sandford Road will be retained and upgraded. It facilitates pedestrian and cycle access as well as limited vehicle access (deliveries, taxis and emergency vehicles) to the area adjacent to Block A1. The on-site cycle facilities tie-in to the existing active travel infrastructure along Sandford Road and Belmont Avenue (no access from Sandford Road to Belmont Avenue except for cyclists), which forms part of the Sandford Clonskeagh to Charlemont Pedestrian and Cyclist Improvement Scheme. As part of the same active travel scheme, it is proposed to upgrade the pedestrian facilities adjacent to the Sandford Road entrance from a pedestrian-only crossing to a Toucan crossing.”

5.10 Drainage Works

The following works are detailed by DBFL Consulting Engineers in Chapter 11 of the separately enclosed EIAR:

"Provision of on-site surface water drainage infrastructure which will discharge from the site along its south-eastern boundary via Milltown Road and the junction of Milltown Road / Sandford Road prior to discharging to the existing public surface water drainage network in Eglinton Road (proposed 300mm diameter pipe extending approximately 300m from the proposed development site boundary to the outfall location which includes replacement of approx. 160m of the existing 225mm diameter drainage network along Eglinton Road.)."

"...The proposed surface water drainage network ... divides the site into four drainage catchments and discharges to an existing 300mm diameter public surface water drain on Eglinton Road (east of the site) at a controlled greenfield runoff rate of 6.0 l/sec."

Please refer to Chapter 11 of the separately enclosed EIAR and the *Infrastructure Design Report* prepared by DBFL Consulting Engineers for further details of the drainage works.

5.11 Summary of Proposed Development

As set out throughout this section, the proposed development will provide a high-quality scheme principally providing 562 No. residential units, a large quantum of public and communal open spaces, communal amenity spaces, community/cultural spaces, a creche and a café/restaurant.

The scheme layout has been carefully considered particularly having regard to the reuse of Tabor House and the Chapel within the development and the requirement to provide 25% public open space. In addition, the building heights have been carefully modulated throughout the site providing appropriate setbacks from neighbouring properties. It is our opinion that the proposed density of 140 No. units per Hectare on this serviced land is not challenging especially as the site can accommodate the proposed density because of the extensive quantum of public and communal open space provided throughout the site.

We note that the total public open space represents 35.3% of the developable site area and the total communal open space represents 10.4% of the site area. The total public and communal open space provided represents c. 45.7% of the developable site area. The public open space provision is fully accessible to the future residents and the wider community, representing a significant planning gain for the area.

6.0 STATEMENT OF CONSISTENCY – NATIONAL PLANNING POLICY

This section will demonstrate that the proposed development has been designed with due consideration of National Policy and is consistent with the relative objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against:

1. *Project Ireland 2040 – The National Planning Framework First Revision (2025);*
2. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
3. *Housing for All—a New Housing Plan for Ireland (2021);*
4. *Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (2018);*
6. *Planning Design Standards for Apartments – Guidelines for Planning Authorities, 2025 ('Apartment Guidelines');*
7. *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024); and*
8. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007).*
9. *Design Manual for Urban Roads and Streets (2019)*
10. *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*
11. *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016*

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

Project Ireland 2040: National Planning Framework is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country. It was first published in February 2018 and has recently been revised under the *National Planning Framework First Revision (2025) ('NPF')*, which was approved by the Houses of the Oireachtas on 30th April 2025 and, accordingly, has now come into effect.

The revised *NPF* continues to set out long term strategic national goals and a place-based approach for future development, gearing towards compact growth and the sustainable development of Ireland to accommodate an increased population of one million people by the year 2040. A key priority of updating the *NPF* was to respond to updated population projections to 2040, requiring accelerated housing delivery and balanced regional growth.

A central pillar of the *NPF* is the principle of 'Compact Growth'. Section 2.2 of the *NPF* sets out an overview of the *NPF* Strategy which includes reference to 'Compact Growth' as follows:

- *"Targeting a greater proportion (40%) of future housing development to be **within the existing 'footprint' of built-up areas.**" [Our Emphasis]*
- *"**Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.**" [Our Emphasis]*

The *NPF* expressly seeks the densification of sites close to public transport, services and facilities (such as the subject site). National Policy Objective 45 states that it is an objective to:

"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, increased building height and more compact forms of development."

Section 6.6 of the *NPF* further calculates that:

*"To meet projected population and economic growth as well as increased household formation, annual **housing output will need to increase to approximately 50,000 homes per annum in the years to 2040** and will be subject to monitoring and review." [Our Emphasis]*

To assist in the delivery of 50,000 additional homes annually, Section 6.6 of the *NPF* further states that Ireland's future homes will need to:

- *"**be located in places that can support sustainable development** - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change;*
- ***be delivered in our cities and larger towns (where large scale housing demand exists), where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run, and***
- *still be located in our smaller towns, villages and rural areas, including the countryside, but at an appropriate scale that does not detract from the capacity of our larger towns and cities to deliver homes more sustainably." [Our Emphasis]*

The *NPF* augments the above, remarking:

"Well designed and located high and medium density housing will assist:

- *Fast-growing urban areas to achieve much needed scale;*
- *Medium-sized urban areas to find a route to quality in a new competitive framework;*
- *All urban areas to increase vibrancy and vitality;*
- *Increased efficiency and sustainability in the use of energy and public infrastructure".*

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the policy objectives as set out throughout this section, as it provides a mix of dwelling unit types (houses and apartments) ranging in size from studios to 3-bed units. By providing a range of unit sizes and unit types, the scheme will cater for all household sizes and types, creating a sustainable community from first-time buyers to family houses to people looking to down-size in the area.

The *NPF* recognises that building inwards and upwards is important to effectively address the housing crisis. Therefore, we consider that there is a significant importance placed in the *NPF* to develop high quality accommodation by increasing the density of developments in the Greater Dublin Area.

In our professional planning opinion, the *NPF* supports the provision of the proposed residential-led mixed use development through elements of increased density and height at the subject site having regard to the brownfield and highly under-utilised nature of the site, scale of the site, the design of the development which protects existing residential amenity, its proximity to public transport, its provision of public open space, and the express requirement of national policy to increase densities and the surrounding planning history.

6.1.1 National Strategic Outcomes and Objectives

Section 10.3 of the *NPF* identifies a list of 10 No. National Strategic Outcomes which sets out the vision of the *NPF* (to create a shared set of goals for every community across the country) as follows:

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

The table below sets out a summary of how the proposed development will contribute towards achieving the 10 No. National Strategic Outcomes identified in the *NPF*:

Consistency with National Strategic Outcomes			
No.	Objective	How is it Addressed by this development?	Meet criteria?
1:	Compact Growth;	Sustainable and efficient redevelopment of a key underutilised, brownfield site in an existing residential area close to high-quality public transport.	Yes

2:	Enhanced Regional Accessibility;	Proximity to Luas stops, bus stops, urban cycling routes and national road network (N11 Stillorgan Road via Eglinton Road and Donnybrook).	Yes
3:	Strengthened Rural Economies and Communities;	N/A – Site is located within the urban area.	N/A
4:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
5:	Sustainable Mobility;	<p>319 No. Car Spaces have been proposed which include car share spaces collection/drop off spaces and short-term/visitor spaces.</p> <p>The scheme also provides 1,343 No. bicycle parking spaces. The facilitation of a pedestrian connection along the east of the site through the new public park linking Sandford Road and Milltown Road will provide increased permeability through the site.</p> <p>The Beechwood LUAS is located c. 1 km / c. 13 minutes walking distance from the subject site, which will encourage sustainable travel patterns.</p>	Yes
6:	A Strong Economy supported by Enterprise, Innovation, and Skills;	The proposed development will provide job opportunities and will strengthen the local economy through the provision of a creche, cultural/community floor space and a café/restaurant. The subject site is also in close proximity (by public transport/bicycle and foot) to many employment locations including the City Centre whereby the proposed development will provide sought-after residential accommodation for employees of such locations.	Yes
7:	Enhanced Amenity and Heritage;	The scheme provides high quality communal amenity space for future residents and extensive public open space for both future residents and the wider community. In particular, the large public park within the northern and eastern portion of the site will provide a safe convenient, and a visually enhanced link from Sandford Road to Milltown Road which will significantly enhance the available amenity space for the wider area. The site has been historically closed from the public and thus the public open space and numerous access points throughout the site will improve the amenity provision for the wider area.	Yes

		<p>It is proposed to provide a low wall and railing in lieu of the existing cement render wall along the majority of the northern boundary, which will allow views into and out of the site along Sandford Road and will thus visually open the site up to the public, enhancing legibility in the area.</p> <p>In addition, Tabor House and the Chapel have been deemed suitable for retention and will be reused and refurbished to provide cultural/community use, therefore enhancing the heritage of the site. The entrance from Milltown Road will provide direct views of Tabor House and the Chapel ensuring that they will be a focus to the development. The set back portion of Block B will enhance Tabor House as a focal point of the development when viewed from the pedestrian boulevard. The proposed public open space within the forecourt area between Block F, Tabor House, the Chapel and the Milltown Road access will attract footfall to this portion of the site which will subsequently increase the appreciation of the retained historic structures.</p>	
8:	Transition to a Carbon Neutral and Climate Resilient Society;	<p>Sustainable modes of transport are encouraged through the provision of multiple pedestrian and cycle links to the surrounding area and through the provision of bicycle parking. SuDS features are provided in the development such as blue and green roofs, tree pits, bioretention areas, permeable paving and landscaped areas for example. The scheme will achieve a high energy rating and compliance with building standards. The proposed creche and café/restaurant will also provide services to residents in close proximity to their dwellings, reducing the need for regular private car usage.</p>	Yes
9:	Sustainable Management of Environmental Resources; and	<p>Sustainable modes of transport are encouraged through significant provision of bicycle parking spaces, and new links through the site from Sandford Road and Milltown Road, along with the incorporation of SuDS measures.</p>	Yes
10:	Access to Quality Childcare, Education, and Health Services;	<p>There are a number of childcare, primary and secondary schools, third level and training facilities, hospitals, GP's, Medical Centres, pharmacies, and dental clinics located within walking/cycling distance of the subject lands. See the <i>Social Infrastructure Audit (inc. Schools and Childcare)</i> for details.</p>	Yes

		Furthermore, the subject proposal includes a creche which has been designed and sized to cater in excess of the projected childcare demand of the development.	
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A number of key National Policy Objectives (NPOs) are outlined in the *NPF* in order to successfully achieve the 10 No. Strategic Outcomes outlined above.

We have carried out an assessment of the NPOs identified in the *NPF* and have identified the relevant objectives that are applicable to the proposed development. The relevant NPOs that are applicable to the proposed development are discussed under the following headings:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Suitable Location for Increased Housing Stock at an Appropriate Scale, Massing & Design;
- Sustainable Modes of Transport; and
- Waste and Environmental.

The development proposed herein is wholly supported by, and supportive of, the foregoing NPOs. As a high-density, residential-led mixed-use development, it seeks to sustainably and efficiently redevelop underutilised, brownfield land within the existing settlement, integrating with the established surrounding area within close proximity to public transport options and employment locations.

6.1.1.1 Population Growth and Employment

The *NPF* sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the 5 No. main cities. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **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 7** – *“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.”*
- **NPO 8** – *“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.”*
- **NPO 13** – *“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”*

- **NPO 16** – “To ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.” [see Table 4.1 from the NPF in Figure 6.1]

City	Population 2022	2018 NPF	Population Growth to 2040 ²⁰		Minimum Target Population 2040
		% Range 2016-2040	% Range 2022-2040	People	
Dublin - City and Suburbs	1,263,000	20-25%	20-25%	296,000	1,560,000

Figure 6.1: Targeted Population Growth for Dublin City and Suburbs

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

- **NPO 42** – “To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.”
- **NPO 41** – “Prioritise the alignment of targeted and planned population and employment growth with investment in:
 - A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;
 - The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities;
 - The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and
 - Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.”

The proposed development is located on underutilised and brownfield land located c. 1.5 km from Dublin City Centre (closest point to the Canal belt and measured ‘as the crow flies’). The site is strategically located in close proximity to public transport which provides access to a number of employment locations, services and facilities. The site is also located within walking and cycling distance to many neighbourhood centres in proximity to the site such as Milltown, Ranelagh, Donnybrook, Clonskeagh and Beechwood. As such, the proposed development is consistent with the above NPOs which aim to provide for 50% of future population and employment growth within the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints.

The high-quality and large quantum of both public and communal amenity spaces proposed will contribute to creating an attractive, liveable and well-designed urban

place. The proposed public open spaces and commercial uses will provide opportunities for interaction and socialisation, ensuring an integrated community within the scheme.

The proposed scheme involves the redevelopment of an underutilised site and therefore is fully in accordance with the preferred approach of the *NPF*. The development will encourage social interaction particularly by providing attractive public and communal spaces and community/cultural spaces within the development, creating a strong sense of community. The provision of permeable links through the site linking Sandford Road and Milltown Park is also a significant planning gain for the wider area, in addition to the provision of a creche and a café/restaurant. The proposed development is consistent with the NPOs set out within this Section.

6.1.1.2 Current Trends in Tenure and Household Formation in Ireland

The *NPF* acknowledges at Section 4.5 that Ireland’s housing crisis has resulted in:

“At a time when many people wish to live close to where they work and to the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained. More homes and more affordable homes must be provided in our urban areas as part of the creation of mixed-tenure communities.”

The following NPOs respond to the changing nature of household formation and trends in tenure in current planning discourse.

- **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, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.”*
- **NPO 38** – *“Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.”*
- **NPO 44** – *“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.”*

The development will rejuvenate this site, opening up the site for the public to utilise for the first time while also providing much needed housing for the area, which will encourage more people to live in the existing urban footprint, while also contributing towards generating more jobs and activity within the existing urban area and will contribute towards the target of delivering 50,000 No. additional households annually until 2040.

The proposed development is a direct response to current trends in household formation in Ireland by providing an alternative type of accommodation not readily seen in the surrounding

area, which is proliferated by larger houses. As such, the scheme provides for a significant proportion of one- and two-bedroom units in addition to a smaller number of studios and three-bedroom units. Of the 556 No. apartment units proposed, 278 No. are oversized units (50% of the total) and 139 No. of these oversized units are universally designed (25% of the total).

The development offers high quality accommodation which in many cases exceeds minimum required standards at a time when the *NPF* acknowledges the constrained urban housing market. The scheme represents sustainable development as the site is situated in an existing residential area, in close proximity to a range of employment locations and services, amenities and facilities accessible by foot, bike or public transport (Luas or bus services) and will contribute towards alleviating the current housing crisis. The provision of a café/restaurant and the creche will also benefit the residents and the surrounding area by providing services within walking distance of their homes and offering job opportunities to the local workforce.

The subject site has never been opened up to the public and thus the proposed development will positively benefit the local area through the provision of multiple pedestrian links through the site and the provision of public open spaces which have been designed to encourage socialisation and integration amongst the local community. The proposed public open spaces have been universally designed to ensure users of all abilities can enjoy the different spaces that the site has to offer.

6.1.1.3 Suitable Location for Increased Housing Stock of an Appropriate Scale, Massing and Design

The *NPF* sets out a number of planning policy objectives that specifically relate to the delivery of housing in appropriate and accessible locations that can support an increased population. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **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 22** – *“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.”*
- **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 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, increased building height and more compact forms of development.”*

It is our professional planning opinion that the subject scheme has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised and brownfield site, contributing positively to the local area. The proposed development has been subject to a high-quality standard of design, siting and layout,

innovatively created by OMP Architects, with the highest elements of the scheme located at the least sensitive locations within the site and the lower elements positioned adjacent to neighbouring residential properties, in accordance with NPO 43. The proposed development seeks to appropriately densify this key underutilised site while facilitating the retention and re-use of Tabor House and the Chapel to provide cultural/community space.

In line with NPO 22, the *Dublin City Development Plan 2022-2028, Planning Design Standards for Apartments – Guidelines for Planning Authorities (2025)*, and *Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024)* set out the specific standards for residential and mixed-use developments, as discussed further in this Report.

6.1.1.4 Sustainable Modes of Transport

The *NPF* sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be the most applicable to the proposed mixed-use development at the subject site.

- **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.”

The scheme will front Milltown Road and Sandford Road, a key crossroads in Dublin and is centrally located near neighbourhood centres such as Milltown, Donnybrook, Clonskeagh, Rathmines and Beechwood. The proposed development provides for 319 No. car parking spaces within the development. The proposal actively encourages the use of sustainable modes of transport such as public transport through the discouragement of car ownership. The development also includes large public open spaces which will encourage occupants to engage in regular physical activity.

The subject site is located in an area well served by public transport which provides access to a wide range of business districts and employment locations such as the City Centre, Canal Ring, the Docklands, Harcourt Street, Ballsbridge, Sandyford Business District and Belfield Office Park/Beech Hill Office Campus. Many of these business districts and employment locations are within walking and cycling distance of the site.

Furthermore, University College Dublin and 4 No. hospitals are located within walking and cycling distance of the site (Clonskeagh Hospital, The Royal Hospital Donnybrook, Saint Vincent’s Hospital and Saint Luke’s Hospital). In addition, a range of services and facilities can be easily accessed from the subject site by bike or on foot in addition to the proposed café/restaurant, creche and community/cultural space to be provided within the subject development. The proposed development includes 1,343 No. bicycle parking spaces to support and encourage cycling as a transport mode.

6.1.1.5 Waste & Environmental

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Waste and Environmental Issues. The following objectives are considered relevant to the proposed residential development:

- **NPO 1** – *“Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA, SFRA and AA as appropriate.”*
- **NPO 66** - *“The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.”*
- **NPO 67** – *“Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.”*
- **NPO 69** – *“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.”*
- **NPO 76** – *“Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.”*
- **NPO 78** – *“Promote sustainable development by ensuring flooding and flood risk management informs place-making by:*
 - *Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management;*
 - *Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.”*
- **NPO 79** – *“Support the management of stormwater, rainwater and surface water flood and pollution risk through the use of nature-based solutions and sustainable drainage systems, including the retrofitting of existing environments to support nature based solutions.”*
- **NPO 82** – *“Support the retrofitting of existing environments to cater for surface water run-off through the use of nature based solutions.”*
- **NPO 89** – *“Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.”*

- **NPO 90** – “Enhance, integrate and protect the special physical, environmental, economic and cultural value of built heritage assets, including streetscapes, vernacular dwellings and other historic buildings and monuments, through appropriate and sensitive investment and conservation.”
- **NPO 93** – “Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green and blue infrastructure planning and innovative design solutions.”
- **NPO 94** – “Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through Strategic Noise Maps, Noise Action Plans and national planning guidance.”

The application lands containing the original Milltown Park House with subsequent extensions are completely underutilised in a prime sustainable location. Up until 2019, the existing buildings and lands at the application site were formally utilised by the Jesuit Community for institutional purposes. The institutional operations on the site ceased permanently in 2015 and the property was vacated by the Jesuit order in 2019.

The proposed scheme has had regard to relevant environmental legislation as set out in the enclosed reports in accordance with NPO 66. In accordance with NPO 1, this application has been accompanied by an Environmental Impact Assessment Report, an Appropriate Assessment Screening Report and a Site-Specific Flood Risk Assessment. The development will support the efficient use of core urban land and will contribute towards reducing the rate of urban sprawl in accordance with NPO 67.

The redevelopment of the subject site will provide a population in close proximity to public transport and encourage walking and cycling, in accordance NPO 93, which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. The development also provides permeable links through the site in proximity to frequent public transport (i.e. through the public park and through the pedestrian boulevard between Blocks A and B). In addition, new pedestrian entrances have been provided and potential links to the remaining Z15 institutional lands to the south-west can be facilitated if required in future. The proposed development will positively contribute to the surrounding area as it will enhance permeability and wider connectivity for the wider area and will contribute to the green infrastructure network (NPO 82).

In total the scheme provides 319 No. car parking spaces within the development comprising 288 No. at basement level and 31 No. at surface level. Some 1,343 No. bicycle parking spaces will also be provided as part of the proposed development. We note that the site is located directly adjacent to a cycle path which runs along Sandford Road and connects the Sandyford Business District into the City Centre via Clonskeagh and Ranelagh.

The incorporation of permeable pedestrian and cycle connections through the site ensures that easy access to a primary cycle route along Sandford Road is provided from the site for future residents of the site and the wider community. The proposed scheme will therefore

promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with NPO 6g.

The proposed development is supported by the following reports/drawings which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues:

- *Landscape Design and Access Statement* prepared by Cameo and Partners Landscape Architects;
- *Traffic and Transport Assessment* prepared by DBFL Consulting Engineers;
- *Infrastructure Design Report* prepared by DBFL Consulting Engineers;
- *Site Specific Flood Risk Assessment* prepared by DBFL Consulting Engineers;
- *Arboricultural Assessment & Impact Report* prepared by CMK Horticulture and Arboriculture;
- *Appropriate Assessment Screening Report* prepared by DNV;
- *Energy & Sustainability Report* prepared by O'Connor Sutton Cronin Consulting Engineers.

The following chapters form part of the EIAR submitted separately and relate to waste and environmental issues:

- Water & Hydrology (Chapter 11) prepared by DBFL Consulting Engineers;
- Material Assets - Waste Management (Chapter 16) prepared by AWN Consulting;
- Air Quality and Climate (Chapter 12) prepared by AWN Consulting;
- Noise and Vibration (Chapter 13) prepared by AWN Consulting; and
- Biodiversity (Chapter 8) prepared by DNV.

It is considered that the proposed development is consistent with the environmental objectives as set out in the *NPF*.

6.2 **Action Plan for Housing and Homelessness, Rebuilding Ireland**

The Action Plan for Housing and Homelessness – Rebuilding Ireland recognises that a significant increase in new homes is needed and is referenced in the long title to the *Planning and Development (Residential Tenancies) Act 2016, as amended*. The Action Plan outlines a five-pillar approach:

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 2 and Pillar 3

- Pillar 2: Increase the level and speed of delivery of social housing and other state-supported housing.
- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.

The publication outlines that the affordability of property in the current economic climate is the basis for the decline in home ownership. As a result, there is a growing number of households paying a greater proportion of their incomes on accommodation which has subsequent impacts on their quality of life and their ability to save.

The publication stipulates in relation to the delivery of housing that:

“the housing challenge is not simply about providing more homes – it is also about moving away from cycles of volatility in supply and affordability. Ireland needs to move towards a more stable, cost effective, affordable housing provision model that also delivers the right level of housing, in the right places and at the right time.”

As discussed throughout this Report, the proposed development will comprise 562 No. units (70 No. studios, 176 No. one bed units, 267 No. two bed units and 49 No. three bed units). The development will directly address the evident housing need by significantly increasing housing accommodation in this highly attractive and sought-after location and responds proportionately to the pillars as set out above, with particular emphasis on Pillars 2 and 3. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The proposed development will provide additional housing options including some 56 No. social housing units, which represents 10% of the proposed units in accordance with Part V of the *Planning and Development Act 2000 (as amended)*.

It has been demonstrated that the proposal subject of this Statement is consistent with the policy guidance of the *Action Plan for Housing and Homelessness, Rebuilding Ireland*.

6.3 ***Housing for All– a New Housing Plan for Ireland, September 2021***

Housing for All - a New Housing Plan for Ireland (“*Housing for All*”) is a multi-annual, multi-billion euro plan which will improve Ireland’s housing system and deliver more homes of all types for people with different housing needs.

The overall objective of *Housing for All* is that:

“Every citizen in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life.”

Section 3 of *Housing for All* states:

“An average of 33,000 homes must be provided every year between now and 2030.”

The policy has 4 No. pathways to achieving *Housing for All*:

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

The subject scheme providing 562 No. residential units in an ideal location at the corner of Milltown Road and Sandford Road, proximate to public transport, employment locations, services and facilities and will contribute towards achieving the objectives of *Housing for All*, by providing housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 56 No. Part V units (10%). Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All*.

6.5 ***Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness***

In reference to *Housing for All* above, we note that since its publication, the Government has published *Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness* ('*Action Plan on Housing*'). Reference is made within this Plan to the progress made under *Housing for All*, stating that "*delivery for 2022, 2023 and 2024 exceeded the targets set in the Housing for All plan by more than 5,200 homes for that period.*"

The *Action Plan on Housing* encompasses 2 No. pillars:

- Pillar 1: Activating Supply; and
- Pillar 2: Supporting People.

Pillar 1 focuses on activating the supply of 300,000 homes, entailing the provision of 50,000 homes annually to 2030. Pillar 2 details how the Government will support people, including the key actions to be taken towards ending homelessness, supporting affordability and addressing the housing needs of people as they progress through life.

Also included under this plan is the commitment to provide 12,000 new social homes every year to 2030.

The provision of 562 No. residential units under the subject scheme will contribute towards achieving the objectives of *Action Plan on Housing* by providing a an adequately densified development on zoned, serviced land within the proximity of a range of services, amenities and public transport. Furthermore, the provision of 56 No. Part V units (accounting for 10% of the total units) will contribute towards the commitment made by Government to provide 12,000 new social homes every year to 2030. Therefore, the proposed development will contribute towards achieving the 2 No. pillars set out in the *Action Plan on Housing*.

6.6 ***Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)***

The *Urban Development and Building Heights Guidelines for Planning Authorities* ("*Building Height Guidelines*") were adopted in December 2018.

The *Building Height Guidelines* state that a key objective of the *NPF* is to significantly increase the building heights and overall density of developments. The Minister's foreword to the *Building Height Guidelines* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas which is an unsustainable model. There

is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards.

The *Building Height Guidelines* state that the:

*“Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, **by building up and consolidating the development of our existing urban areas.**” [Our Emphasis]*

The *Building Height Guidelines* further note 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.” [Our Emphasis]

The *Building Height Guidelines* also emphasise that increasing prevailing building heights have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and it notes that the planning process must actively address how this objective will be secured.

The *Building Height Guidelines* also advise that taller buildings can assist in contributing to a sense of place and can indicate important street junctions:

*“Furthermore, while **taller buildings** will bring much needed additional housing and economic development to well-located urban areas, they can also assist in reinforcing and contributing to a sense of place within a city or town centre, such as indicating the main centres of activity, **important street junctions**, public spaces and transport interchanges. In this manner, **increased building height is a key factor in assisting modern placemaking** and improving the overall quality of our urban environments.” [Our Emphasis]*

The layout of the proposed development has been subject to numerous design iterations to ensure that the scheme as proposed presents the optimal planning solution for the lands and its surrounding context. The proposed layout has positioned the highest forms at the least sensitive locations throughout the site (fronting Milltown Road and Sandford Road, fronting the large public open space to the east of the site, and towards the centre and southern portions of the subject lands), at a distance from sensitive residential receptors. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a significantly scaled, strategically positioned and underutilised plot is maximised, in proximity to good public transport accessibility and at an appropriate location for increased height, in line with the *Building Height Guidelines*.

The 8 No. storey elements of Block A1 & A2 will act as a focal point and will improve legibility and wayfinding for the wider area and internally within the site.

The *Landscape and Visual Impact Assessment* prepared by Modelworks (EIAR Chapter 9) notes the following in relation to Block A1:

"The intention is to take advantage of the building's separation distance from neighbouring properties/sensitivities (due to the set-back behind the woodland belt) and the screening provided by the trees/woodland, to achieve density and also mark the junction of Sandford Road and Milltown Road with the eight storey accent volume."

The presence of the tree belt will reduce the visual impact of the building while also ensuring that it improves the place-making and legibility for the area.

A *Daylight and Sunlight Assessment Report*, prepared by 3D Design Bureau, has been submitted alongside this application. Its findings are dealt with further below within this Section. It concludes that *"the proposed development represents a high-quality design that meets the intent of the relevant guidelines. It successfully mitigates impact on the surrounding context while delivering bright, high-quality homes and amenity spaces for future occupants."*

It is our professional planning opinion that the site has the capacity and capability to accommodate increased height that is actively sought in National policy guidance, given the scale of this c. 4.26 Ha site, which allows additional height to be proposed at strategic locations within the site, having regard to the strategic location of the subject site in proximity to public transport, employment locations, services and facilities. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme.

Chapter 3 of the *Building Height Guidelines* expressly seeks increased building heights in urban locations:

*"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."*
[Our Emphasis]

Under the heading 'Development Management Principles', the *Building Height Guidelines* state (at paragraph 3.1) that it is Government policy that building heights must generally be increased, and that Planning Authorities must apply certain broad principles when considering development proposals for buildings taller than prevailing building heights in pursuit of the *Building Height Guidelines*. There is no doubt, therefore, that the Specific Planning Policy Requirements in the *Building Height Guidelines* are relevant to the assessment of this proposed development.

Section 3.1 of the *Building Height Guidelines* states that *"Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines"*:

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to

brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

The proposed scheme involves the redevelopment of an existing underutilised, brownfield, infill site in a prominent sustainable location. The subject development will contribute towards delivering compact growth in our urban areas. The scheme is therefore fully in accordance with the preferred approach of the *NPF*, which seeks compact growth.

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these Guidelines?

In our professional opinion, the *Development Plan* should be read in conjunction with the *Building Height Guidelines* and in this regard, we note that the *Development Plan* allows flexibility in relation to building heights in line with the *Building Height Guidelines*.

It is considered that the heights proposed principally ranging from 2 No. storeys to part 8 No. storeys on this expansive site are appropriate at the subject lands in order to accord with Government policy to increase building heights in sustainable locations.

The subject scheme has been sensitively designed to have minimal impact on the residential amenity of surrounding existing dwellings. Examples of such design measures include the positioning of the highest forms at the least sensitive locations throughout the site (fronting Milltown Road and Sandford Road, fronting the large area of public open space to the east of the site, and towards the centre and southern portions of the subject lands), at a distance from sensitive residential receptors. Furthermore, we note that a key priority throughout the detailed design stage of the development was to provide sufficient setbacks and appropriate transitions from the residential properties along Cherryfield Avenue Upper and Lower along the western boundary and from the residential properties along Norwood Park to the north.

In this regard, 2 No. storey courtyard-type houses have been provided along the western extent of the site, with a minimum separation distance of c. 30-metres provided from the adjacent dwellings on Cherryfield Avenue Upper and Lower.

In addition, large setbacks of between c. 32.5 metres to c. 50 metres have been provided between the Norwood Park dwellings and the part 4 No. to part 5 No. storey elements of Block C, with larger separation distances provided from the 7 No. storey pop-up element of Block C.

The variation in proposed heights across the site provides visual interest and is appropriate in this location in order to accord with Government policy to increase building heights in sustainable locations. In particular, the 8 No. storey elements of Block A1 and A2 will act as a focal point at the prominent junction of Sandford Road and Milltown Road at a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

The *Development Plan* allows a locational based assessment of height to be carried out in relation to building height, which is more flexible than the prescriptive heights of the previous *Development Plan*.

We note in particular, National Policy Objective 45 of the *NPF*, which seeks an increase in 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, increased building heights and more compact forms of development.

It is our opinion that the subject site has the potential for increased heights to sustainably densify this strategic site having regard to the high quality architectural composition of the scheme, the large public open spaces provided and the site's location at a prominent junction which will all contribute towards absorbing the proposed building heights.

We note that Chapter 9 (Landscape and Visual Impact Assessment) of the separately enclosed EIAR remarks that the significance of the townscape effects of the proposed development will be 'moderate', and that it would "*achieve significant townscape benefits, including the provision of high quality new public open space for the future residents and the wider community, and place identification and improved legibility.*"

Specific Planning Policy Requirement 3

SPPR₃ of the *Building Height Guidelines* sets out that:

"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 [below]; 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.** [Our Emphasis]*

We now wish to consider how the proposed development complies with the specified criteria under Section 3.2 of the *Building Height Guidelines*, which are referred to in SPPR₃ as follows:

At the scale of the relevant city/town

The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.

The site is well served by public transport such as the Green Line Luas (Beechwood Luas 1 km / c. 13 minutes walking distance) and bus routes such as No. 11, 14, 39a, 44, 44D, S2, E1, E2 and the 700 (Aircoach service). The Green Line Luas links with the Red Line Luas in the City Centre i.e. interchange at O'Connell Street / Abbey Street etc., which ultimately leads to various Train Stations e.g. Heuston Station and Connolly Station. There is also multiple bus stops with various different routes located in proximity to each Green Line Luas stop which

provides passengers with a plethora of destination options within Dublin City Centre and beyond. The subject site also benefits from its proximity to the future Bray to City Centre Core Bus Corridor along Donnybrook Road and Stillorgan Road. Sandymount Station and Sydney Parade Station are the closest DART stations to the subject site, located a c. 30-32 minute walk or a c.9-10 minute cycle.

The Green Line Luas frequency is every c. 3-5 No. minutes during peak hours and every c. 12 – 15 No. minutes frequency during off-peak hours and the bus services located in proximity to the subject site generally range in frequency from every c. 7-30 No. minutes frequency to hourly frequencies.

The proximity of the site to high frequency public transport provides opportunities for residents of the scheme to travel to employment locations and business districts such as the Canal, the Docklands, Harcourt Street, Ballsbridge, Sandyford Business District, Belfield Office Park and neighbourhood centres such as Ranelagh, Donnybrook and Rathmines. The majority of these areas are also located within cycling and walking distance of the site.

Furthermore, the following 4 No. hospitals are within close proximity to the subject site:

Hospitals		
No.	Name	Distance
1	Clonskeagh Hospital	→ c. 450 metres → c. 3 No. minutes cycling distance → c. 6 No. minutes walking distance
2	The Royal Hospital Donnybrook	→ c. 1.4 km → c. 5 No. minutes cycling distance → c. 17 No. minutes walking distance
3	St Vincent’s Hospital	→ c. 2.3 km → c. 7 No. minutes cycling distance → c. 26 No. minutes walking distance
4	St Luke’s Hospital	→ c. 2.9 km → c. 10 No. minutes cycling distance → c. 37 No. minutes walking distance

In addition, University College Dublin is located within c. 7 No. minutes cycling distance and c. 21 minutes walking distance from the subject site.

Therefore, it is clear that there are significant employment opportunities and services and facilities that are easily accessible from the subject site. The site is well located proximate to frequent public transport, some of which link to other forms of public transport e.g. Green Line Luas links with the Red Line Luas, which ultimately leads to various Train Stations.

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 practitioner such as a chartered landscape architect.

It has been detailed in the *Masterplan + Architectural Design Statement, Landscape Design and Access Statement* and Thornton O’Connor Town Planning documents how the development will be assimilated into the surrounding context. In this regard we note that the subject site

has strong frontage onto Milltown Road and Sandford Road at a prominent intersection between Milltown, Clonskeagh, Donnybrook and Ranelagh.

The site is located in proximity to an Architectural Conservation Area (Belmont Avenue ACA) which is to the north of the subject site. There are Protected Structures also located to the north on the opposite side of Sandford Road and to the east along Clonskeagh Road with additional Protected Structures located to the north-west along Sandford Road and to the south along Milltown Road (greater distance). The proximity of the site to the ACA and Protected Structures has been duly considered as part of the design process of the subject scheme and the proposed development is integrated with the character and cultural heritage of the surrounding area by:

- The provision of public open space within the northern and eastern portion of the site naturally ensures that the building forms are set back from the ACA and Protected Structures on Sandford Road and Clonskeagh Road;
- The natural set back provided between the site and the ACA/Protected Structures due to the position of Sandford Road which runs between the northern boundary of the site and the southern boundary of the ACA/Sandford Road Protected Structures and also due to the position of Milltown Road which runs along the eastern boundary of the site and the Protected Structures along Clonskeagh Road; and
- The position of built forms within the site which are set back from the boundary with Sandford Road.

In addition, the proposed development incorporates the refurbishment and reuse of Tabor House and the Chapel which will integrate with the new buildings proposed as part of the development. The proposal will repurpose the buildings to accommodate cultural/community spaces therefore promoting and enhancing the character of the buildings. The reuse and refurbishment of Tabor House and the Chapel will ensure the creation of characterful setting, with the buildings acting as a focal point for the development, especially entering the site from Milltown Road or walking through the pedestrian street from the northern end of the site, with glimpses of Tabor House shown through the setbacks of Block B. The café/restaurant will be located within the ground floor of Block F in proximity to Tabor House and the Chapel, which will increase footfall activity within this portion of the site and thus increase the appreciation of the retained and repurposed structures. The north of the site is slightly lower than the south of the site near Tabor House and the Chapel and the new blocks (in particular Block A1/A2) and the pedestrian boulevard have been cognisant of this change in levels and are laid out appropriately.

We note the following from Chapter 7 of the EIAR (Architectural Heritage) prepared by Molloy and Associates Conservation Architects:

"On balance, the potential for positive impact is inherent in the rejuvenation of the site through the adaptation of existing building fabric of heritage interest, within their setting to an extent, and the provision of new buildings to secure a sustainable long-term use for the site.

...The proposal to restore and adapt selective buildings, which are deemed to be both of heritage significance and suitable for purposeful adaptation, has been conceived to minimise the extent of loss across the site as a whole.

The works proposed to the buildings selected for reuse, have been designed with the objective of preserving the character of the site and detailed to minimise unnecessary loss.

...The retention of two buildings for purposeful re-use within the vast building range presents an inherently positive impact for the legibility of the original function of the site."

We note that the proposed scheme has reduced in scale in some places since the LRD 1 Application (e.g. the reduction in height of Block A1 from 10 No. storeys to 8 No. storeys) and thus we are of the opinion that any potential impact to the existing and retained structures and the receiving environment would be lessened.

Block D proposes heights of only part 3 No. to part 5 No. storeys with the 3 No. storey element positioned on the western portion of the building to provide an appropriate transition to the neighbouring dwellings on Cherryfield Avenue Upper further west. The western elevation of Block D is c. 35-metres from the rear elevations of the neighbouring dwellings to the west. The separation distance, building height and enhanced tree planting will ensure the privacy and amenity of residents in Cherryfield Avenue Upper is protected.

Block F to the south of the site ranges in height from 5 No. to 7 No. storeys and has been set back from the remaining Jesuit lands. A creche and café/restaurant have been strategically located on the ground floor of Block F to increase the level of footfall to the site.

The scheme then transitions in height along the eastern boundary with Block A1 ranging in height from part 5 No. to part 8 No. storeys and Block A2 ranging in height from part 6 to part 8 No. storeys. The 8 No. storey elements of Block A will act as a 'visual marker' for the scheme at the prominent junction of Sandford Road and Milltown Road at a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh. The Block A focal point will improve legibility and wayfinding for the wider area and internally within the site.

The subject site has significant frontage onto Sandford Road and Milltown Road which facilitates the unique opportunity to provide permeable connections through the site. These include connections through the public park and the pedestrian boulevard. In tandem with the provision of pedestrian gates, the opening up of portions of the boundary wall, and the addition of commercial uses to the local area, this represents a significant planning gain for the area as the site is closed from the public (the lands have always been in private use by the Jesuit community). The provision of these connections will encourage permeability through the site benefiting the wider public, whilst also assisting with the integration of the proposed scheme into the surrounding area and enhancing the public realm.

From the outset, the Design Team has sought to create a scheme that complies with daylight and sunlight requirements with respect to neighbouring properties, the public open spaces and the residential units themselves (tallest elements positioned away from surrounding dwellings).

The *Daylight and Sunlight Assessment Report*, prepared by 3D Design Bureau and enclosed under separate cover, states that *"the proposed development delivers a high standard of residential amenity in the vast majority of proposed units, balancing density with access to natural light and high-quality green spaces"*, and that *"[i]t successfully mitigates impact on the surrounding context."* Furthermore, it states that *"[t]he vast majority of assessed residential*

windows (300 of 318) will experience a 'negligible' impact on daylight access", with "c. 98% of relevant windows meeting the BRE criteria for annual sunlight".

We note the following from Chapter 9 of the EIAR (Landscape and Visual Impact Assessment) prepared by Model Works, which considered key views through and surrounding the subject site:

"The junction of Sandford Road, Milltown Road, Clonskeagh Road and Eglinton Road funnels traffic from three urban cores, i.e. Clonskeagh/UCD, Milltown and Donnybrook, towards the city centre via Ranelagh. The site occupies the most prominent of the four quadrants around the junction. Due to a number of factors, including the non-orthogonal configuration of the junction, the absence of buildings at the corner of the site, and the wall and trees along the site boundary, the junction does not manifest as a distinct 'place' in the townscape. Despite the large houses and trees around the junction it does not figure clearly in people's mental map of the area and does not contribute positively to legibility.

The junction as a place, and the streets to which the site has frontage, warrant greater emphasis in the townscape – to give better definition to the junction locally, and to improve the legibility of the urban structure. This can be achieved only by built form on the site (the other quadrants around the junction all being already developed). However, the site's main landscape asset, the belt of trees inside the boundary, is a constraint to development that would seek to address the roads and junction. Any building in the corner must be set back behind the trees. It is only through substantial height that a building on the site will achieve the dual objective of place-making and legibility."

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"The junction of Sandford Road, Milltown Road, Clonskeagh Road and Eglinton Road funnels traffic from three urban cores, i.e. Clonskeagh/UCD, Milltown and Donnybrook, towards the city centre via Ranelagh. The site occupies the most prominent of the four quadrants around the junction. Due to a number of factors, including the non-orthogonal configuration of the junction, the absence of buildings at the corner of the site, and the wall and trees along the site boundary, the junction does not manifest as a distinct 'place' in the townscape. Despite the large houses and trees around the junction it does not figure clearly in people's mental map of the area and does not contribute positively to legibility.

The junction as a place, and the streets to which the site has frontage, warrant greater emphasis in the townscape – to give better definition to the junction locally, and to improve the legibility of the urban structure. This can be achieved only by built form on the site (the other quadrants around the junction all being already developed). However, the site's main landscape asset, the belt of trees inside the boundary, is a constraint to development that would seek to address the roads and junction. Any building in the corner must be set back behind the trees. It is only through substantial height that a building on the site will achieve the dual objective of place-making and legibility."

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

1) Place-Making

The proposed development will contribute positively towards place-making due to the large spaces and streets provided throughout the scheme as set out in detail below. These large spaces will ensure that a sense of place and wayfinding is achieved in the scheme as residents and the wider public travel through the various routes provided.

The development proposes heights of principally part 2 to part 8 No. storeys across the site. There will be many 'destination' points in the scheme such as the forecourt to the retained Tabor House and the 8 No. storey pop-up elements flanking Sandford Road, Milltown Road and the new public park and plaza, which will add architectural interest to the scheme by creating a strong architectural presence to announce the development for residents and the public on entering the site. It is our opinion that this vertical building form will assist in the wayfinding strategy of the scheme. O' Mahony Pike Architects note the following in their *Masterplan + Architectural Design Statement*:

"Height Baseline - Design strategy is to establish baseline height of 5 storeys within the centre of the scheme which, depending on the contextual edge condition and degree of separation, steps up or down 2 storeys.

Anchor buildings - These elements of 7-8 storeys provide accent and variation at either end of the axial route between the forecourt and the plaza which enhances legibility, wayfinding and connectivity.

Urban Marker - The proposed 8 storey 'urban marker' acts as a reference point within the local area to enhance legibility and placemaking by announcing the development sitting within an expansive site which is otherwise concealed from the wider community behind an existing 3M high perimeter wall and existing mature tree belt.

Placemaking - The location of this urban marker responds to the wider context and urban morphology by marking the key junction and transition between the merging neighbourhoods of Milltown, Ranelagh, Clonskeagh and Donnybrook. The design intent, massing and orientation of this building specifically responds to the view South from this junction on Eglinton road creating an elegant 'punctuation mark' as the building extrusion emerges at a suitable height above the horizontal 'green veil' around the perimeter of the site along the North and East edges. As such, at the neighbourhood scale it acts as a 'reference point' in the landscape.

Emerging Context - A taller building in this location it will add interest to the skyline and provide a visual reference point. While the site is on the periphery of the City Centre, it is in an area of emerging urban character with substantial developments to the South and East.

Green Belt - This urban marker addresses the flow of the park as it winds it way around the North/ East corner while also signifying the wide 3 storey pedestrian archway connection between the park and the central plaza space. With the exception of the urban marker the rest of the development will be below the height of the existing mature tree belts which are retained and provide a 'green veil' to the perimeter of the site along the North and East edges."

It is our professional planning opinion that the proposed heights of principally part 2 to part 8 No. storeys across the site cannot be considered challenging on this large core urban site. It is clear that the Design Team has comprehensively considered the height of the blocks within the proposed development as the modulation of height throughout the site responds to the situational context of each block within the site. The 8 No. storey pop-up 'visual marker' is a key element of the proposed scheme in terms of its role in wayfinding for the local area and internally in the site and will act as a focal point for the scheme having regard to its position along Milltown Road and at the junction of Sandford Road and Milltown Road.

2) New Streets and Urban Spaces

The proposed design and strategic layout provides visual relief through the blocks and concentrates on providing high quality open spaces and permeable connections throughout the scheme, therefore creating play opportunities, functional public space and attractive routes to navigate for the future residents and wider public to utilise. The proposed pedestrian boulevard will link the north of the site to Tabor House and the set back of the ground and first floor levels of Block B will provide visual connections through to Tabor House which will contribute towards the legibility of the development.

The new streets, spaces and connections which will create visual interest for the surrounding streetscape and provide permeable connections for the residents and wider public will principally consist of:

Streets and New Visual Connections:

1. A new public park along the east of the site from Sandford Road to Milltown Road;
2. A pedestrian avenue from Sandford Road through the plaza area, connecting through the pedestrian boulevard to the forecourt at the front of Tabor House and the Chapel (with access to Milltown Road also possible at this location). The ground and first floor levels of Block B have been set back (designed as a colonnade) to allow a visual connection through to Tabor House;
3. The provision of lower heights (3 No. storeys) within the central Block B will allow additional visual connections through the site into the courtyard;
4. New pedestrian gates will be provided at the vehicular access point from Sandford Road and pedestrian access will be provided at the vehicular entrance along Milltown Road as well as a new pedestrian access point provided near the junction of Milltown Road and Sandford Road into the public park. These access points demonstrates that ample permeable opportunities for pedestrians and cyclists are provided in the proposed development;
5. A portion of the boundary treatment of the existing wall will be modified along Milltown Road and Sandford Road. In this regard, a proposed upstand wall with railing will be provided in lieu of the existing cement render wall which will allow views into the site and will thus visually open the site up to the public and will enhance legibility in the area; and

6. There will be limited vehicular activity within the subject scheme. At the principal Milltown Road entrance, cars will predominately enter the basement on arrival to the site. Some 94% of cars will filter directly into the basement from Milltown Road (within c. 20 metres of the site entrance) and this will ensure that the shared surface to the west of the site adjacent to the Block E courtyard houses which proposes 6 No. units will not be car dominated and will be a safe environment for all users. The existing Sandford Road entrance will be the secondary vehicular access to the site (principally for deliveries, emergencies and taxis for example with a small element of mobility impaired parking for residents) and thus will have very minimal traffic movements. The limited number of cars arriving through the Sandford Road access will be prevented from entering the plaza area due to the newly proposed bollards.

New Urban Spaces:

We note that a large area of the eastern extent of the subject site is currently significantly overgrown and this space will be transformed by the subject development and will become a significant public amenity for the area.

The Public Open Spaces will be provided as follows (total 15,023 sq m/35.3% of site area):

- **Public Park and Plaza Area Connected Through the Triple Height Undercroft of Block A1:**

c. 10,879 sq m (c. 25.57% of the c. 42,547 sq m developable site area)

- **Additional Public Open Space:**
 - **Woodland Glade**
 - **Boulevard**
 - **Garden Café Area**

c. 4,144 sq m (c. 9.74% of the c. 42,547 sq m developable site area)

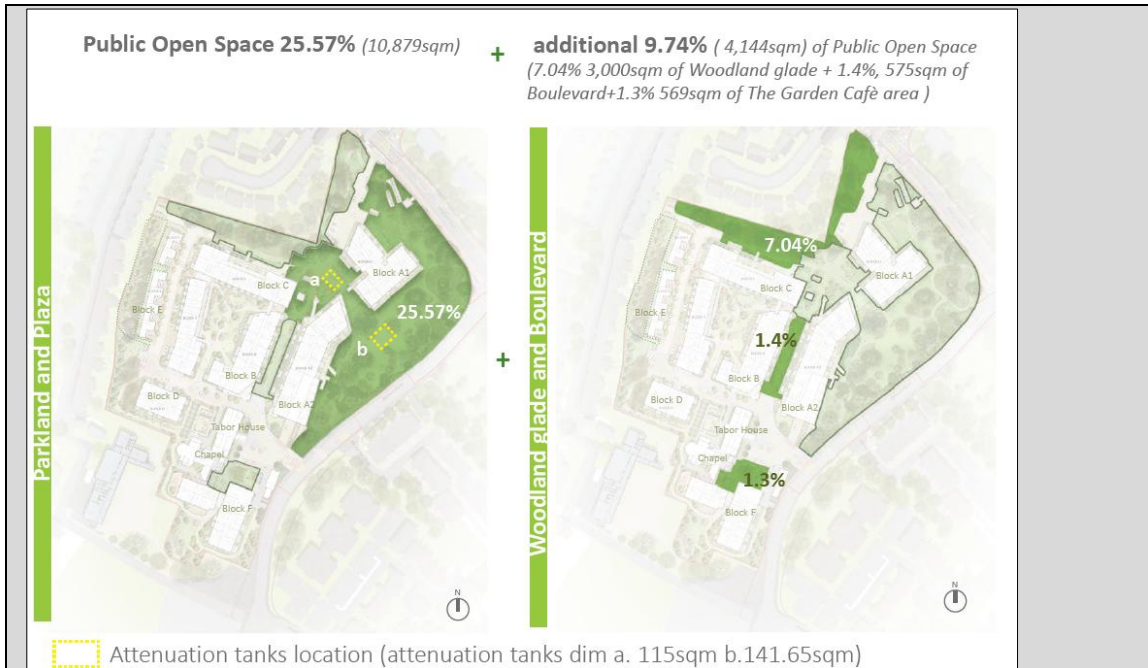


Figure 6.2: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2025)

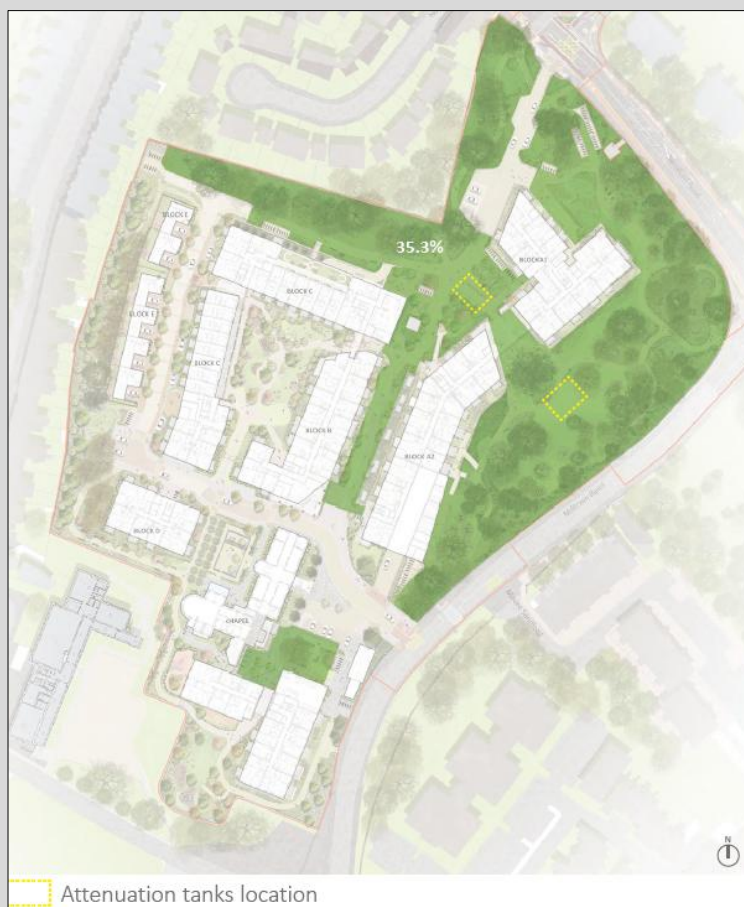


Figure 6.3: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2025)

The opening up of the area while maintaining the woodland feel will allow access to the general public for the first time and the imposing boundary wall will be modified in a section to provide views into the site, inviting the public into the open spaces provided and improving permeability in the area.

Natural play facilities for the scheme will be mainly focused within these areas, specifically aimed at children to reconnect with nature and there will also be opportunity for adult engagement through natural gym equipment. There will also be seating provided throughout the site.

The total communal open space proposed at ground floor level is 4,314 sq m (10.1% of the developable site area) and is provided as follows:

1. Belvedere Garden (North of Block C): 120 sq m
2. Walled Garden (Proximate to the Chapel/Block D/Block F): 2,631 sq m
3. Courtyard between Block B and C: 1,563 sq m

In addition, there will be a communal amenity terrace (109 sq m) on Block A₁, which will further add to the communal space provision within the proposed development.

The subject lands are currently enclosed from the public and have historically always been in private use. The opening of the site to the public and provision of glimpses in through the new boundary treatment will generate visual interest in the streetscape and the provision of new streets, open spaces and connections is therefore considered a significant planning gain for the area.

3) Massing and Height

The proposed scheme is presented in various forms and heights across the site, transitioning from the lower heights along more sensitive boundaries to the highest forms which are positioned at the least sensitive locations such as fronting Milltown Road and Sandford Road, fronting the public park, and towards the centre and southern portions of the subject lands. We note that 2 No. storeys are provided adjacent to the residential dwellings (Cherrywood Avenue Upper and Lower) along the west of the site and the part 4 No. to part 7 No. storey height of Block C is setback c. 32.5 to 50 No. metres from the Norwood Park dwellings to the north.

Elsewhere, the height transitions to principally between 5 and 8 No. storeys at the least sensitive locations which will avoid any abrupt transitions in scale and height from neighbouring residential dwellings. Therefore, the positioning of the higher building forms has been subject to detailed consideration to ensure that the scheme can be assimilated into the receiving environment. The criterion relating to “*variety in scale and form to respond to the scale of adjoining developments*” is considered to be met and has been addressed previously in this Report.

At the scale of 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 high-quality design and strategic layout of the proposed development provides an appropriate transition to surrounding residential dwellings having regard to clear guidance provided in national planning policy which seeks the densification of core urban sites in close proximity to public transport such as the subject site. The large separation distances proposed and modulation of heights throughout the site will ensure that the development will not be overbearing.

Having regard to the results of the *Daylight and Sunlight Assessment Report*, which states, in relation to surrounding properties, that "[t]he vast majority of assessed residential windows (300 of 318) will experience a 'negligible' impact on daylight access", with "c. 98% of relevant windows meeting the BRE criteria for annual sunlight". We further note that in relation to the occurrence of non-compliance for daylight, the report states "[w]here non-compliance occurs (specifically at Rowan Hall / Cedar Hall), it has been technically demonstrated that this is primarily driven by the architectural features of the existing buildings (overhanging balconies) rather than the massing of the proposed development. The further 40 no. non-residential windows/rooms that have been assessed are all compliant with the BRE recommendations, including the granted building for which the 'No Sky Line' study was also fully compliant." Having regard to this assessment and the *Landscape and Visual Impact Assessment* (Chapter 9 of the EIAR), it is contended that the proposal responds well to its overall built environment.

The proximity of the site to the ACA and Protected Structures has also been duly considered as part of the design process of the subject scheme. This has already been discussed above in the context of the setting back of the development to protect the setting of Protected Structures and the ACA.

The high-quality materials utilised in the scheme, the provision of a new public park, new pedestrian connections and the newly proposed upstanding wall with railings along sections of the boundary wall will ensure that the development will make a positive contribution to the streetscape. The development will respond to its natural environment by contributing to the green infrastructure of the city and by providing large areas of public and communal open spaces which will include ecological enhancements such as bat boxes and bird boxes etc. The new public park, pedestrian connections and provision of glimpses through the revised boundary treatment will encourage connectivity and permeability for the wider public, which will create a vibrant sense of place and will make a positive contribution to the urban neighbourhood and streetscape.

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 scheme has been designed to ensure interesting and relieved facades which reduce the perceived mass and scale of the blocks. As discussed, the height varies across the site and the orientation of the blocks also alternates throughout the scheme layout which demonstrates that the blocks have been broken down to ensure that the scheme will not represent a monolithic form. Each block has a subtle shift in direction as a response to its particular urban condition. The material palette has comprehensively considered the surrounding neighbourhood. In this regard, the *Masterplan + Architectural Design Statement* states:

"Both the historical and contemporary context heavily rely on brick as the predominant building material, with a wide variety of colours and types reflecting the piecemeal development of the area over a prolonged period of time. Although alternative materials have been explored, brick feels a natural choice for the base material for our proposal.

It is our intention that through considered sampling and selection, brickwork for the body of the buildings will bring a domestic, softened and textural quality to the building, whilst also echoing character traits of its context in the area.

However the three main contextual conditions surrounding Sandford Road are broadly coherent in three broad hues:

Buff/Brown Brick, reflecting the predominant brick type along Ranelagh Road, as well as working with the painted render St James Terrace. This colour choice also responds to the sites Tabor House & Chapel buildings.

Red/Brown, reflecting the predominant use of red along Eglinton Road, Sandford Road & Belmont Avenue.

Grey Brick, referencing the harder facing base and edge stone which is apparent on the historical housing façade typologies to create a hard wearing street interface plinth.



The completed building expression provides a simple building form that reinterprets the surrounding building fabric to relate positively to neighbouring structures and create a harmonious whole.

The architecture of each building varies enough to ensure a diverse and interesting urban fabric, albeit within a considered palette of complimentary materials and colours.

Subtle variations in the architectural expression and material palette of the different blocks to ensure a diverse and interesting urban fabric, albeit within a considered palette of complementary materials and colours that provide a degree of variation and interest as the building forms progress and relate to the different surrounding conditions."

An interesting feature of the scheme is the views provided through the site from outside through the new entrance points. In addition, views through the triple-height undercroft within Block A will allow for an interesting journey for pedestrians, and views from the north of the site towards Tabor House will be visible through the colonnade at the setback ground and first floor levels of Block B, which demonstrates that the proposal has been well considered, as the massing of the blocks has been broken down to provide large areas of open space, visual links and pedestrian pathways through the scheme.

The *Masterplan + Architectural Design Statement* prepared by O' Mahony Pike Architects sets out the rationale for the design approach and how conscious efforts have been made to

provide architecturally interesting forms and spaces and notes that the proposed Block A linear element is comparable to the constructed Mount Saint Anne’s development in Milltown and serves to provide good edge containment to the open space. It is clear that a significant effort has been made to provide well considered and interesting building forms which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area.

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 provision of permeable links throughout the site (public park and pedestrian boulevard) and the opening up of the site as viewed from Milltown Road and Sandford Road represent key planning gains for the wider neighbourhood.

The development has been subject to a sensitive detailed design process creating significant quantum’s of public open space within the Public Park and Plaza area connected through the triple-height undercroft of Block A1 (c. 10,879 sq m), the Northern Woodland Glade (c. 3,000 sq m), the pedestrian boulevard between Blocks A and B providing a pedestrian and cycle connection between Milltown Road and Sandford Road (c. 575 sq m) and the Garden Café area (c. 569 sq m).

In addition, the scheme also provides 4,423 sq m of communal open space provided in the Belvedere Garden (North of Block C), Walled Garden (Proximate to the Chapel, Block D and Block F), and the Courtyard between Block B and C; in addition to an Upper Level Terrace in Block A1.

The large open spaces will allow the heights to be appropriately assimilated into the surrounding context. The proposed density of 140 uph at the core urban site is not considered excessive and reflects the extensive quantum of public and communal open space provided throughout the site. The proposed development of this Planning Application has a site coverage of 20.65% which is lower than the indicative standard provided in the *Development Plan* (45-60% for Z12 zoned lands). This further demonstrates the concerted efforts made by the Design Team to ensure that the development maximises opportunities to provide substantial tracts of open space (and separately generous separation distances).

The *Specific Site Flood Risk Assessment* prepared by DBFL Consulting Engineers identifies the site to be located within Flood Zone C and concludes that the proposed development is appropriate for the site’s flood zone category.

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 high-quality design of the scheme will ensure the development will be a legible and attractive addition to this area of Dublin. The provision of permeable links through the site (provision of a new public park, pedestrian boulevard, new pedestrian entrances and the facilitation of future potential links to the remaining Z15 institutional lands to the south-west)

will positively contribute to the surrounding area as it will enhance permeability and wider connectivity for the wider area.

The public park setting along the east of the site will provide a high-quality attractive route for residents and the wider public to utilise for leisure, play or exercise and this area will be provided with natural play opportunities and high-quality landscaping. The layout of the scheme ensures that the development improves legibility in the area and will integrate into the surrounding context having regard to the open spaces, permeable links, visual connections through the site and the height transitions and the breakdown in massing provided.

The reuse of the Chapel and Tabor House will also provide a very characterful setting which will benefit from enhanced views via the newly proposed entrance from Milltown Road.

The proposal positively contributes to the mix of uses and/or building/ dwelling typologies available in the neighbourhood.

The NPF states that:

"In Dublin city, almost 60% of people live in one, two and three person households. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms."

Therefore, it is clear that the mix of primarily 1 and 2 No. bed units with a smaller quantum of studios and 3 No. bed units proposed are urgently required in order to provide an appropriate mix of dwelling typologies in the area. The *Development Plan* does not specify a required housing mix for the subject site (dwelling mix requirements are only set out for the North Inner City and the Liberties limiting the number of studios and one bedroom units to 25-30% and requiring a minimum of 15% of units to be three bedroom units).

In addition, the creation of public open spaces, commercial uses and cultural/community spaces will enhance the amenity of the overall site for the community and thus a high-quality environment for future residents and the wider community will be provided.

At the scale of the site/building

The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

The Design Team have comprehensively considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the surrounding context. This has been achieved by providing a range of heights throughout the site and by breaking down the massing provided in addition to the significant quantum of open space and permeable links proposed throughout the site.

It is noted that the *Daylight and Sunlight Assessment Report* concludes that the proposed development "*successfully mitigates impact on the surrounding context*", with the following

compliance rates noted in the *Daylight and Sunlight Assessment Report* when considering the impacts of the development to neighbouring properties:

- Effect on Vertical Sky Component (VSC)¹⁹: 300 of 318 of assessed residential windows will experience a 'negligible' impact on daylight access.
- Effect on Annual Probable Sunlight Hours (APSH): for 217 No. of 222 No. of assessed windows/rooms, the effect on the APSH will be 'negligible' (c. 98% compliant).
- Effect on Winter Probable Sunlight Hours (WPSH): for 199 No. of 222 No. of assessed windows/rooms, the effect on the WPSH will be 'negligible' (c. 97% compliant).
- Effect on Sun On Ground²⁰ (SOG) in Existing Gardens: for 37 No. of 39 No. assessed gardens, the effect on the SOG would be 'negligible' (2 No. gardens categorised as 'non-applicable').

Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. 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.

[NB: The *Daylight and Sunlight Assessment Report* notes:

"at the time of publication of the Urban Development and Building Height Guidelines (2018), BR 209 was in its second edition, first published in 2011. Since then, a third edition of BR 209 has been published (June 2022) and the 2nd edition has been withdrawn. BR 209 no longer references BS 8206-2:2008, which has also been withdrawn. The standard now referenced in BR 209 edition 3 is BS EN 17037."

*As noted above, the results of the *Daylight and Sunlight Assessment Report* present a high level of compliance with BRE standards in terms of Daylight (VSC), Sunlight (APSH/WPSH) and Sun on Ground (SOG). The report notes that "[t]he scheme performs exceptionally well regarding sunlight impact" and, in relation to Sun on Ground, that "[a]ll assessed areas either fully comply with BRE Guidelines or retain their current baseline condition where existing obstructions preclude any further impact."*

¹⁹ Ratio of that part of illuminance, at a point on a given vertical plane, that is received directly from an overcast sky model, to illuminance on a horizontal plane due to an unobstructed hemisphere of this sky. Usually the 'given vertical plane' is the outside of a window wall. The VSC does not include reflected light, either from the ground or from other buildings.

²⁰ Assessment of what portion of a garden or amenity space is capable of receiving 2 hours or more of direct sunlight on March 21st.

A summary of the results on neighbouring properties of the *Daylight and Sunlight Assessment Report* is provided below:

Daylight (VSC):

"The vast majority of assessed residential windows (300 of 318) will experience a 'negligible' impact on daylight access. Where non-compliance occurs (specifically at Rowan Hall / Cedar Hall), it has been technically demonstrated that this is primarily driven by the architectural features of the existing buildings (overhanging balconies) rather than the massing of the proposed development. The further 40 no. non-residential windows/rooms that have been assessed are all compliant with the BRE recommendations, including the granted building for which the 'No Sky Line' study was also fully compliant."

Sunlight (APSH/WPSH):

"The scheme performs exceptionally well regarding sunlight impact, with c. 98% of relevant windows meeting the BRE criteria for annual sunlight. The few instances of non-compliance along Cherryfield Avenue Upper are attributable to localised factors, such as existing rear extensions and orientation, rather than the proposed development itself."

Sun on Ground (SOG):

"All assessed areas either fully comply with BRE Guidelines or retain their current baseline condition where existing obstructions preclude any further impact. Therefore, the development will not result in any adverse impact on the amenity of neighbouring rear gardens."

A 'Scheme Performance' on all habitable rooms within the proposed development was carried out within the *Daylight and Sunlight Assessment Report*. In relation to the results of this, the report states that *"the proposed development delivers a high standard of residential amenity in the vast majority of proposed units, balancing density with access to natural light and high-quality green spaces."*

A summary of the results is provided below:

Internal Daylight (SDA):

"The scheme achieves a favourable compliance rate in the 'Spatial Daylight Autonomy' assessment. While the report identifies some units with reduced daylight access, these are typically associated with geometric constraints such as internal corners or the provision of generous private balconies in constrained areas of the site. It is 3DDB's opinion that these deviations are acceptable when viewed in the context of the wider benefits of the scheme. These benefits include the provision of high-quality external amenity and privacy, alongside the retention of mature trees which preserve the unique character of Milltown Park."

Sunlight Exposure (SE):

"A compliance rate of c. 80% has been achieved for sunlight exposure in habitable rooms (excluding deciduous trees). This aligns with the guidance provided in the BRE Guidelines"

regarding optimising proposed layouts. While the assessment identifies some non-compliance, this is typical for large-scale developments due to the inevitability of single-aspect units and localised constraints. When trees are included as opaque objects, the compliance rate adjusts to c. 76%. This is considered an acceptable compromise, as the units affected by the trees benefit from a pleasant, leafy outlook onto the mature woodland."

Outdoor Amenity:

"The external amenity strategy is highly effective. While some individual spaces are naturally shaded due to building orientations and some spaces will have the pleasant dappled shade of a woodland setting, there are also spaces that will enjoy prolonged sunlight access. The aggregate 'Sun on Ground' performance is excellent. Future residents will have access to a variety of outdoor spaces, ranging from the enclosed 'Belvedere Garden' to the bright, open 'Parkland & Plaza'. This diversity ensures year-round usability."

The Daylight and Sunlight Assessment Report concludes that:

"it is the expert opinion of 3D Design Bureau that the proposed development represents a high-quality design that meets the intent of the relevant guidelines. It successfully mitigates impact on the surrounding context while delivering bright, high-quality homes and amenity spaces for future occupants."

Specific Assessments

To support proposals at some or all of these scales, specific assessments may be required, and these may include:

Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

A 'Microclimate-Wind' EIAR Chapter (Chapter 17) has been prepared by OCSC, which states that:

"The modelling has included the proposed design, the proposed landscaping strategy and the existing landscape which will remain, in conjunction with the existing buildings surrounding the development. The combination of all interactions has resulted in a comfortable environment for pedestrians within the proposed development."

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 Appropriate Assessment Screening Report prepared by DNV concludes that:

"On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the likelihood of any significant effects on any European sites, whether arising from the project itself or in combination with other

plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the AA process; and the preparation of a NIS is not required."

An Ecological Impact Assessment carried out as part of the Chapter 8 of the EIAR (Biodiversity) details the relevant surveys that have taken place. The Report notes that no established flight lines have been recorded over the site and that likely significant effects are not deemed likely to occur. The Report also considered lighting and building materials as part of the assessment. Therefore, it is considered that the protection of bats and birds have been comprehensively considered in the proposed development for the construction and operational stage.

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

A *Telecommunications Impact Assessment Report* has been prepared by ISM (Independent Site Management) as part of this application. This report notes that the assessment did not identify any microwave links or radio frequency links that will be blocked by the proposed development "*which would require the Applicant to make specific allowances for their retention ("Mitigation Measures")*". The report further notes that:

"...the Applicant should reserve the right to revisit the requirement to make allowances for Radio Frequency coverage at a future date if the mobile telecommunication companies do not make provision for the increase in population density in the area. The Planning Authority should note that population density is a significant factor in the integrity of an urban Radio Frequency cell."

An assessment that the proposal maintains safe air navigation.

It is considered that the development will not have an impact on air safety having regard to the distance from the subject site to Tallaght Hospital helipad, Baldonnel Aerodrome, Weston Airport and Dublin Airport for example. In addition, an *Aviation Glint and Glare Assessment* has been prepared by Macro Works which concludes: "*From the analysis and discussions contained herein, it is considered that the proposed PV arrays at the proposed Large Residential Development at Milltown Park, Sandford Road, Dublin 6 results in a 'Pass' at the Rathmines aviation receptor."*

An urban design statement including, as appropriate, impact on the historic built environment.

As set out in the Architectural Heritage EIAR Chapter (Chapter 7) prepared by Molloy and Associates Conservation Architects, the site comprises a building range which consists of the original Milltown Park House and later extensions, which are interconnected to varying degrees to form a single entity.

We note that the Chapel and Tabor House are proposed to be reused within the proposed development while the Archive, Finlay Wing, Milltown Park House and Milltown Park House Rear Extension, and the link building between Tabor House and Milltown Park House within the subject lands are proposed to be demolished.

A *Masterplan + Architectural Design Statement* has also been prepared by O' Mahony Pike Architects and is enclosed as a separate document. As set out in the 'Existing Buildings

Feasibility Study' (Appendix to the OMP *Masterplan & Architectural Design Statement*), by retaining Tabor House and the Chapel there is an opportunity to showcase these buildings, which are detachable from the grouping and will become a focal point within the development.

Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.

A comprehensive EIAR has been submitted as part of this application for the subject LRD. An Appropriate Assessment Screening Report and a Biodiversity chapter (Chapter 8) as part of the EIAR have been prepared by DNV in conjunction with this planning application.

Conclusion on compliance with criteria under Section 3.2 of the *Building Height Guidelines*:

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines*. The application proposes a development ranging in height from part 2 No. to part 8 No. storeys and includes the refurbished Chapel and Tabor House.

The development can be appropriately assimilated within the surrounding context having regard to the location of the subject site within an existing built-up area at the prominent intersection of Milltown, Clonskeagh, Donnybrook and Ranelagh and which is well served by public transport and in proximity to employment locations, services and facilities. The 8 No. storey elements will announce the development for residents and the wider public. This element is considered an appropriate contextual response to the receiving environment which will add architectural interest to the scheme by providing a focal point within the scheme to assist with wayfinding in the area.

It is our professional planning opinion that the subject site is capable of achieving additional height and density having regard to the *NPF* and the *Building Height Guidelines* which encourages increased height and density on appropriate sites. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the amenity of adjacent properties and the surrounding area having regard to the position of the highest forms at the least sensitive locations at the subject site. We note that buildings of greater heights were previously accepted by both Dublin City Council and An Coimisiún Pleanála in the assessments of the previous SHD & LRD on site. In relation to the LRD 1 application, the *Daylight and Sunlight Assessment Report* notes that "[a]lthough the results of the VSC impact assessment in the previous application were considered to be favourable, the current proposal shows an improvement in this regard" and that previous adverse effects "have now been mitigated through a reduction of massing".

6.7 *Planning Design Standards for Apartments – Guidelines for Planning Authorities, 2025*

The Department of Housing, Planning and Local Government published the *Planning Design Standards for Apartments- Guidelines for Planning Authorities* in July 2025 ('*Apartment Guidelines*') which were an update to the 2023 version. The *Apartment Guidelines* recognise the need for alternative types of accommodation to facilitate the societal and economic changes which would be better suited to reflect current and evolving household formation and housing demand.

The proposed development comprises 562 No. residential units, consisting of 1-bed, 2-bed and 3-bed apartments, and 3-bed courtyard type houses, which will provide a range of unit sizes for people seeking residential accommodation in Dublin. In addition, it is highlighted that the development provides 56 No. social housing units as required under Part V.

The *Apartment Guidelines* sets out Specific Planning Policy Requirements ('SPPR') and general requirements for apartment developments. Each SPPR and general requirement are set out below with a response provided for each in respect of compliance of the proposed development:

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."*

While there are no restrictions for the mix of unit sizes or types at the subject site, as set out in SPPR 1 above, the proposed development has had due regard to the existing mix of housing tenure in the local area and seeks to contribute to the mix of housing by providing 556 No. apartments and 6 No. courtyard type houses. Of the 562 No. units proposed, there will be 70 No. studio units (12.5%), 176 No. 1-bed units (31.3%), 267 No. 2-bed units (47.5%) and 49 No. 3-bed units (8.7%).

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) 32sq.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

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.” [Our Emphasis]

All units meet, and in some cases, exceed the minimum apartment floor areas set out in SPPR 2, as demonstrated in the *Housing Quality Assessment* prepared by OMP Architects, included as Appendix C of the *Masterplan + Architectural Design Statement*.

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” [Our Emphasis]*

In the subject scheme, 51% of the apartments and 100% of the courtyard houses will be dual aspect, significantly exceeding the minimum requirement set out in SPPR3 above. This demonstrates the high-quality design of the subject scheme.

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.”

The ground level apartments floor to ceiling heights meet the requirements of SPPR 4 of the *Apartment Guidelines*.

SPPR 5:

“There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.”

N/A.

SPPR 6:

“The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.”

Despite the provisions of SPPR 6, the subject scheme provides for 1,946 sq m of cultural & community floorspace, situated in the refurbished Chapel, Tabor House and the 'Secret Garden' outdoor space. This reflects the high-quality design of the scheme and, in addition to the provision of public open space, accounting for 35.3% of the site area, will be a notably positive addition to the local community.

SPPR 7:

"There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process."

N/A – SPPR 7 applies to Shared Accommodation/Co-Living Development.

SPPR 8:

(A) *"(i) There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes.*

(ii) The minimum required area for a single study bedroom without en-suite facilities is 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities is 11.5 sq.m; and statutory plans may not set out minimum required areas that exceed the minimum required areas set out within this SPPR. areas set out within this SPPR.

(iii) The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons are 3.6 sq.m and 3.3 sq.m per person, respectively; and statutory plans may not set out minimum required areas that exceed the minimum required.

(B) *Where any other requirement or restriction is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single student accommodation scheme."*

N/A – SPPR 8 applies to Purpose Built Student Accommodation.

Recommended Minimum Widths for the Main Living/Dining Rooms

The *Apartment Guidelines* outline a requirement for the minimum widths of the main living/dining rooms as follows:

Unit Type	Min. Living/Kitchen Room Width
Studio	4 m
One Bedroom	3.3 m
Two Bedroom (3 No. person)	3.6 m
Two Bedroom (4 No. person)	3.6 m
Three Bedroom (4 No. person)	3.8 m
Three Bedroom (5 No. person)	3.8 m

The proposed units have been designed in accordance with the standards for the minimum widths of the living/dining rooms, as detailed in the submitted floor plans and the *Housing Quality Assessment* enclosed and prepared by OMP Architects.

Minimum Bedroom Floor Areas/Widths

The *Apartment Guidelines* outline a requirement for minimum bedroom floor areas and widths as follows:

Unit Type	Minimum Floor Area	Minimum Width
Studio	25 sq m	4 m
Single Bedroom	7.1 sq m	2.1 m
Double/ Twin Bedroom	11.4 sq m	2.8 m

Each of the units have been designed in accordance with the standards for the minimum bedroom floor areas and widths outlined in the *Apartment Guidelines*. Please refer to the *Housing Quality Assessment* and architectural drawings enclosed separately.

Minimum Storage Space Requirements

The *Apartment Guidelines* outline a requirement for minimum storage space as follows:

Unit Type	Minimum Floor Area
Studio	3 sq m
One Bedroom	3 sq m
Two Bedroom (3 No. person)	5 sq m
Two Bedroom (4 No. person)	6 sq m
Three Bedroom (4 No. person)	6 sq m
Three Bedroom (5 No. person)	9 sq m

All units will meet, and exceed in some cases, the internal storage standards. Please refer to the *Housing Quality Assessment* prepared by OMP Architects.

Private Open Space

The *Apartment Guidelines* outline a requirement for private open space as follows:

Unit Type	Private Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. person)	6 sq m
Two Bedroom (4 No. person)	7 sq m
Three Bedroom (4 No. person)	7 sq m
Three Bedroom (5 No. person)	9 sq m

Private open space has been provided for each of the proposed units in line with the requirements outlined in the *Apartment Guidelines*. In many cases the private open space provision for the proposed units exceeds the minimum standards outlined in *Apartment Guidelines*.

Communal Open Space

The *Apartment Guidelines* outline the following standards for communal open space:

Unit Type	COS Requirement Per Unit
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. Person)	6 sq m
Two Bedroom (4 No. Person)	7 sq m
Three Bedroom (4 No. Person)	7 sq m
Three Bedroom (5 No. Person)	9 sq m

Based on the composition of the proposed 70 No. studios, 176 No. one-bed units, 54 No. two-bed units (3-person), 213 No. 2-bed units (4-person) and 43 No. three-bed units, the subject scheme has a requirement of 3,362 sq m of communal amenity space to meet the minimum standards outlined in the *Apartment Guidelines*.

The subject scheme includes 4,423 sq m of communal amenity space designed by Cameo and Partners Design Studio, which significantly exceeds the minimum requirement.

Car & Cycle Parking

The *Apartment Guidelines* states that “car parking ratios should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport” and refers to SPPR 3 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)* for the maximum car parking rates. Similarly, the *Apartment Guidelines* refer to SPPR 4 of the same document for minimum cycle parking requirements.

In this regard, please refer to the following Section for compliance with the maximum car parking standards and minimum cycle parking requirements.

As outlined above, it is clear that the proposed development complies fully with the SPPRs, and further requirements set out in the *Apartment Guidelines*.

6.8 Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities, 2024

Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (“*Compact Settlement Guidelines*”) were adopted in January 2024, replacing the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*. Their purpose is to promote and accommodate more sustainable development (residential in particular), setting density standards and a suite of design requirements, such as those relating to parking and public open space.

As with the *Apartment Guidelines*, the *Compact Settlement Guidelines* define a series of Specific Planning Policy Requirements (SPPRs), as well as a suite of 'Policies and Objectives'; the rest of this section lists these and provide responses to demonstrate the proposed development's compliance with same.

SPPR 1 (Separation Distances):

"It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective 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.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."

** "Any reference to a statutory development plan(s) in these Guidelines refers to all development plans made under the Planning and Development Act 2000 (as amended) or under any replacement Planning and Development Act, including local area plans and strategic development zones planning schemes.*

*** "Refer to definition in Appendix A: Glossary of Terms." The Appendix defines this as "Primary living spaces such as living rooms, dining rooms, studies and bedrooms." [Our Emphasis]*

As a general rule, SPPR 1 ultimately requires a separation distance of at least 16 metres between opposing windows of habitable rooms at the rear and side of dwellings at above ground floor level. No minimum separation distance applies at ground floor levels or to the front of dwellings.

The approach to the design of the proposed development has been to protect and respect residential amenity, whilst aligning with the standard set by the Guidelines. In most cases throughout the development, the minimum separation of 16 metres has been exceeded, as demonstrated in Figure 6.4.

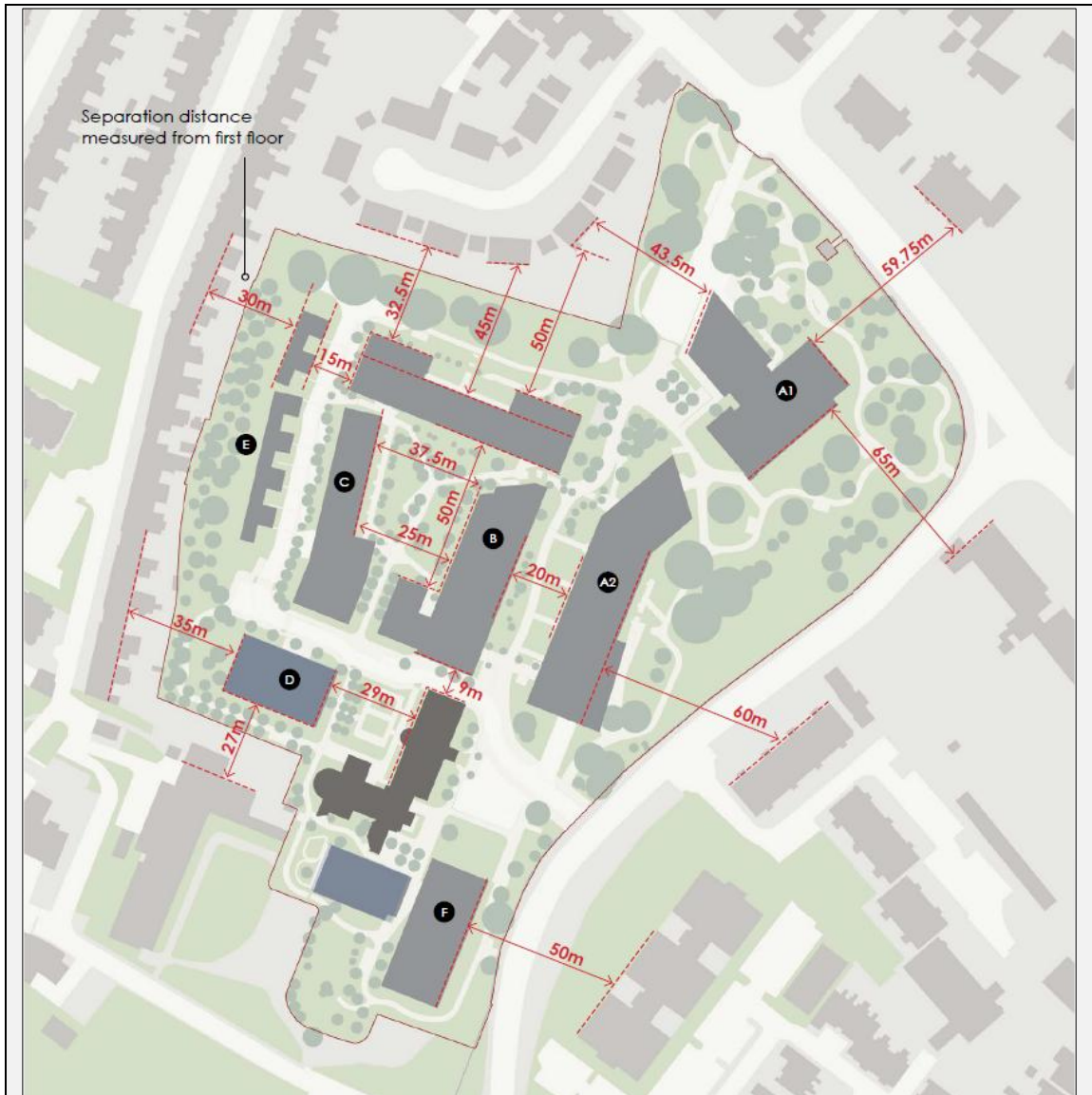


Figure 6.4: Separation Distances Between Residential Blocks and Neighbouring Properties

(Source: Masterplan & Architectural Design Statement by OMP, 2025)

We note that there are only two instances where the 16-metre separation distance is not achievable. In the first instance, there is a separation distance of 9 metres between the northern elevation of Tabor House and the southern elevation of Block B. However, SPPR1 refers to the 16-metre minimum separation distance between residential uses and Tabor House is not a residential use (cultural/community space). The second instance is between the eastern (front) elevation of the courtyard houses and Block C where the separation distance is 15.017 metres which is only 0.983 metres below the 16-metre distance requirement. However, we note that SPPR1 does not require the 16-metre separation distance between opposing windows at the front of residential units. The exception to the 16-metre separation distance applies in this instance as the distance between the courtyard houses and Block C is taken from the **front** of the courtyard houses and not from the rear or side.

Therefore, the proposed development complies with SPPR 1 of the *Compact Settlement Guidelines* and the scheme will enjoy a high level of amenity.

SPPR 2 (Minimum Private Open Space Standards for Houses):

"It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq.m*
- 2 bed house 30 sq.m*
- 3 bed house 40 sq.m*
- 4 bed + house 50 sq.m*

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

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 2023 (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.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."

*The private open space provided for each of the courtyard houses exceeds the minimum standards, with 65.2 sq m provided for each house. The private amenity space for the proposed apartments are in accordance with the minimum requirements set out in the *Apartment Guidelines*, as demonstrated in the Housing Quality Assessment prepared by OMP Architects.*

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, shall be 1 no. space per dwelling.*
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) 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, shall be 1.5 no. spaces per dwelling.

- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall 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 maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.”

Based on the definitions provided in Tables 3.1, 3.2 and 3.8 of the Guidelines, in our opinion, the site falls within the “city centres and urban neighbourhoods of the five cities” categorisation.

Therefore, the Guidelines set a maximum car parking rate of 1 No. space per dwelling. Based on the provision of 562 No. residential units, a maximum of 562 No. residential car parking spaces could be provided at the site. The scheme provides a residential car parking ratio of 0.496 No. spaces per unit (excluding car share and accessible parking spaces as per SPPR 3 above) which is below the maximum standards and is considered acceptable in our opinion due to the proximate public transport options, employment locations, services and facilities, all of which are within walking/cycling distance of the subject site. The proposed café/restaurant and creche on site will also provide future residents with some day-to-day services which reduces the need for private car usage.

Therefore, the proposed development complies with SPPR 3 of the *Compact Settlement Guidelines*.

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 should 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 to make provision for a mix of bicycle parking types including larger/heavier 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 safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.* [Our Emphasis]

SPPR 4 requires the provision of at least 1 No. cycle parking space per bedroom, plus visitor parking (quantum not specified). Based on the provision of 70 No. studios, 176 No. 1-bed units, 267 No. 2-bed units and 49 No. 3-bed units, the residential cycle parking requirement equates to 927 No. spaces. The proposed development will provide 1,343 No. cycle parking spaces. Of these, 1,305 No. spaces will cater for residents and their visitors of the scheme, and the 38 No. remaining spaces will be dedicated to the staff and visitors of the creche, cultural/community and café/restaurant.

Policy and Objective 3.1 (Densities)

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

Establishing the density range for sites is based on its settlement size and area type set out in Tables 3.1 – 3.7 of the *Compact Settlement Guidelines*. As the subject site is located in 'Dublin City & Suburbs', the *Compact Settlement Guidelines* set out 3 No. areas and density ranges for the area as illustrated in Figure 6.5.

<p>City - Centre</p> <p>The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods⁶, 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.</p>
<p>City - Urban Neighbourhoods</p> <p>The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations⁷, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.</p>
<p>City - Suburban/Urban Extension</p> <p>Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development⁸. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).</p>

Figure 6.5: Areas and Density Ranges for Dublin & Cork City and Suburbs

(Source: *Sustainable and Compact Settlement–Guidelines for Planning Authorities (2024)*)

We are of the opinion that the subject site falls within the 'City – Urban Neighbourhoods' location having regard to the first option of the area type which is described as a “**compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses**” as well as the overall description of sites within this area type as “**highly accessible urban locations with good access to employment, education and institutional uses and public transport**”. As discussed throughout this Report, the subject site benefits from its strategic location in proximity to public transport, employment and education locations, services and facilities within an established residential neighbourhood. The proposed development will also offer a creche, cultural/community floor space and a café/restaurant for future residents and the local community to use.

Consequently, a 'general' density within the range of 50–250 dwellings per hectare (dph) should be achieved.

Appendix B of the *Compact Settlement Guidelines* sets out how net residential density should be measured:

- Calculate Net Site Area
- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwelling by reduced site area.

This calculation has been applied to the subject development as follows:

Stage	Metric	Calculation	Figure
A	Net Site Area (sq m)		42,547
B	Total GFA (sq m)	C+D	50,196
C	Residential GFA (sq m)		47,247
D	Non-Residential GFA (sq m)		2,949
E	Residential GFA as Proportion of Total GFA (%)	C/B	94.1%
F	Pro Rata Site Area (sq m)	AxE	40,047.38
G	Number of Dwellings		562
H	Net Residential Density (dph)	G/F/10000	140.3

Therefore, the subject development adheres to the density requirements pertaining to the subject site by providing 140 dph on a site designated for 50 – 250 dph.

Policy and Objective 4.1 (DMURS)

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

The proposed development has incorporated the principles, approaches and standards of the *Design Manual for Urban Roads and Streets (DMURS)* in its design. This is evident in the

drawings and *DMURS Design Statement* prepared by DBFL Consulting Engineers, which concludes:

"It is DBFL's opinion that the proposed residential-led mixed-use development is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and streets (DMURS). This report outlined the specific design features that have been incorporated within the proposed development that had the objective of delivering a design that is in full compliance with DMURS."

Policy and Objective 4.2 (Quality Urban Design and Placemaking)

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

The "key indicators of quality urban design and placemaking" set out in Section 4.4 of the *Compact Settlement Guidelines* fall under the headings of:

- **"Sustainable and Efficient Movement"**

"Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars."

- **"Mix and Distribution of Uses"**

"Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice."

- **"Green and Blue Infrastructure"**

"Placing and [sic] emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities."

- **"Responsive Built Form"**

"Placing an emphasis on the creation of a coherent urban structure and design approach that responds to local character and is attractive."

"Sustainable and Efficient Movement"

The layout of the development proposes an array of connections including vehicular, pedestrian and cyclist links. Therefore, the site will be well connected and accessible by sustainable modes. Ample cycle parking is proposed to promote and accommodate safe and sustainable active modes of transport. The site prioritises pedestrians to allow for safe and easy access, egress and internal movement. To provide a safe and pedestrian area that is not dominated by cars, the proposed car parking is provided predominantly at basement level which is accessed from Milltown Road and 94% of traffic from Milltown Road will filter directly into the basement without needing to traverse through the site.

"Mix and Distribution of Uses"

The proposed mix of houses, apartments and duplexes will comprise either studios, 1-bed units, 2-bed units and/or 3-bed units to ensure there is a diverse range of unit types and sizes available to facilitate greater housing choice in the area. As well as the 562 No. residential units, there will be a creche, a café/restuarant and cultural/community space which ensures there is a mix of uses at the subject site.

"Green and Blue Infrastructure"

The subject lands are currently enclosed from the public and have historically always been in private use. The proposed development seeks to open up the site for members of the public to enjoy by providing significant areas of public open spaces as well as communal open spaces for future residents of the development to use. Planting and landscaping are an integral aspect of the proposed development. A carefully considered layout will achieve an attractive and ecologically beneficial proposal, supportive of local biodiversity and trees have been retained where possible.

"Responsive Built Form"

The built-form of the development positively and respectfully responds to the site shape and context of the site. The proposed scheme transitions from the lower heights along more sensitive boundaries to the highest forms which are positioned at the least sensitive locations such as fronting Milltown Road and Sandford Road, fronting the public park, and towards the centre and southern portions of the subject lands. The scheme will promote a sense of place and character especially due to the animation of activity provided along the streetscape from the proposed public open spaces and commercial uses at ground floor. The scheme provides a coherent pedestrian network with permeable link through the site which will enhance legibility for the area.

Policy and Objective 5.1 (Public Open Space)

"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.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the

planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site."

This Policy and Objective requires statutory plans to set minimum public open space standards generally in the range of 10–15% of the net site area. As the *Development Plan* already prescribes a minimum public open space requirement of 25%, this is deemed to be the quantitative standard that the proposed development should meet. The proposed development provides 15,023 sq m of public open space, equating to 35.3% of the site area. This is above the minimum 25% requirement set by the *Development Plan*.

6.9 **Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)**

The *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)* outline a number of key principles which are of relevance to the subject scheme:

"The purpose of these Guidelines is to assist in achieving the objectives of Delivering Homes; Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by:

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

The subject scheme provides a high-quality designed scheme in accordance with required standards. The scheme makes optimal use of the lands and has taken the opportunity to explore the potential for an increase in heights in appropriate locations throughout the site.

The scheme will be provided with high quality materials that are reflective of the surrounding context, as described throughout the *Masterplan + Architectural Design Statement*. The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The scheme will provide attractive and high-quality residential units, communal amenity space, open

spaces, community/cultural floorspace, and commercial floor space (creche and café/restaurant), which ensures that first-rate living conditions will be developed. In addition, the design of the subject scheme has evolved through a creative process, in conjunction with the results of the *Daylight and Sunlight Assessment* to ensure an attractive living environment for future residents. The safety and security guidance outlined in the 2007 Guidelines have also been taken into consideration in the design of the scheme.

6.10 *Design Manual for Urban Roads and Streets (2019)*

The *Design Manual for Urban Roads and Streets* (DMURS) sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

6.10.1 Policy Background

The *Design Manual for Urban Roads and Streets* references the *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document which was published by the Department of Transport. The key goals as set out within the *Smarter Travel* document include:

- (i) To reduce overall travel demand;
- (ii) To maximise the efficiency of the transport network;
- (iii) To reduce reliance on fossil fuels;
- (iv) To reduce transport emissions; and
- (v) To improve accessibility to public transport.

Given the accessible location of the application site in proximity to a high frequency public transport and employment locations, it is projected that residents of the scheme would largely rely on walking, cycling or utilising existing public transport routes to reach their place of work. Due to high-quality public transport, car parking is limited to 319 No. spaces within the proposed development (including 10 No. car share spaces). The scheme is considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009 – 2020*.

6.10.2 Site Layout and Legibility

As noted previously, the proposed development promotes permeability and legibility through the site by providing a public park and a pedestrian boulevard for example in addition to pedestrian access points from Sandford Road and Milltown Road. Car parking is provided predominantly at basement level which is accessed from Milltown Road and 94% of traffic from Milltown Road will filter directly into the basement without needing to traverse through the site.

The existing vehicular access off Sandford Road will be a secondary vehicular access to the site, principally for deliveries, emergencies and taxis for example with a small element of mobility impaired parking for residents, and thus will have very minimal traffic movements.

We note that the development has been designed in accordance with DMURS. The proposed high-quality designed layout of the scheme by OMP Architects will ensure that the scheme will be legible in the streetscape while also sitting comfortably within its immediate context. In particular, the 8 No. storey element of Blocks A1 & A2 will act as a focal point for the scheme which will enhance legibility and wayfinding for the wider community and internally in the site.

6.10.3 Sustainable Transport

The site is well served by public transport with particular emphasis on the Luas and high frequency bus routes serving the subject site. The public transport availability in proximity to the site provides access to a wide range of business districts and employment locations such as the Canal Ring, the Docklands, Harcourt Street, Ballsbridge, Sandyford Business District and Belfield Office Park. We note that many of these business districts and employment locations are within walking and cycling distance of the site. Furthermore, University College Dublin and 4 No. hospitals are located within walking and cycling distance of the site (Clonskeagh Hospital, The Royal Hospital Donnybrook, Saint Vincent's Hospital and Saint Luke's Hospital). A *Mobility Management Plan* has been prepared by DBFL Consulting Engineers and is enclosed with this application.

The DMURS publication references that the Smart Travel document includes a "vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips." The proposed scheme provides 1,343 No. bicycle parking spaces in total ensuring that sustainable modes of transport are encouraged.

In respect of achieving DMURS objectives, the *DMURS Design Statement* prepared by DBFL Consulting states that:

"It is DBFL's opinion that the proposed residential-led mixed-use scheme is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2019. The scheme proposals are the outcome of an integrated design approach that seeks to implement a sustainable community connected by well-designed streets which deliver safe, convenient and attractive networks in addition to promoting a real and viable alternative to car-based journeys... This report outlined the specific design features that have been incorporated within the proposed development that had the objective of delivering a design that is in full compliance with DMURS."

The *DMURS Design Statement* sets out specific attributes of the scheme design which contribute to achieving this DMURS objective.

6.11 *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*

The *Planning System and Flood Risk Management Guidelines (2009)* published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;

- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

A Site Specific Flood Risk Assessment has been prepared by DBFL Consulting Engineers and is submitted herewith. Please refer to the Assessment for full details, however, we note the following conclusion:

"Following the Flood Risk Assessment, it has been determined that the site is located in Flood Zone C as defined by the Guidelines.

It is concluded that:

- *The proposed residential-led mixed-use development and its associated development works are appropriate for the site's flood zone category.*
- *The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.*

In conclusion the proposed development is considered to have the required level of flood protection up to and including the 100-year return event.

Overland flow paths have been identified for pluvial flooding exceeding the capacity of the proposed surface water drainage network."

Therefore, the proposed development is acceptable having regard to the objectives of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

6.12 Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016

The *Guidelines for Planning Authorities on Childcare Facilities (2001)* ("*Childcare Guidelines, 2001*") sets outs that:

"Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities...In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate."

The *Childcare Guidelines, 2001* further state:

"The Planning and Development Act, 2000, makes it a mandatory requirement on planning authorities to include in their Development Plan objectives on the provision of services for the community, including creches and other childcare facilities."

The objectives of the *Childcare Guidelines, 2001* are to:

- Update and develop baseline data on the quality of existing and prospective childcare needs in association with the County Childcare Committees;
- Promote childcare facilities in the following locations as a key element in the provision of sustainable communities:
 - Residential areas;
 - Places of employment;
 - Educational establishments;
 - City and town centres, neighbourhood and district centres;
 - Convenient to public transport nodes.
- Establish a system of monitoring the achievements of the above objectives.

Furthermore, the *Childcare Guidelines, 2001* identify appropriate locations for the provision of childcare facilities. This includes the following:

- New communities/Larger new housing developments - *'Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.'*
- The vicinity of concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working – *facilitating safe and efficient journeys to/from the workplace of parents/guardians.*
- In the vicinity of schools – facilitating parents dropping off school-going children and children attending childcare facilities on route to their place of employment.
- Neighbourhood, District and Town Centres – combating competitive pressure from larger commercial areas.
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes and dedicated cycle ways.

The *Childcare Guidelines, 2001* stipulate that Planning Authorities should require one childcare facility (providing for a minimum 20 No. childcare places) per approximately 75 No. dwellings. However as noted above, a childcare facility does not need to be provided if there are significant reasons relating to the development consisting of single bed apartments or where adequate childcare facilities exist in adjoining developments.

It is also noted that the *Apartment Guidelines* state the following:

"One-bedroom or studio type units should not generally be considered to contribute to a requirement for any on-site childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms."

We note that the enclosed *Community and Social Infrastructure Audit (incl. Schools and Childcare)* prepared by Thornton O'Connor Town Planning concludes that *"the analysis of existing capacity indicates a robust demand for additional childcare places. Given the childcare demand generated by the proposed development, its unit typology, alongside the shifting age and demand profile, it is considered that an additional childcare facility would be a favourable addition to the area"*. Accordingly, the Applicant has incorporated a crèche into the scheme, which will benefit the future residents of the development, but will also cater for the immediate existing residents of the area and thus will greatly enhance the amenity of the area.

The proposed development will provide a creche (375 sq m) within the ground floor of Block F and will cater for c. 75 No. children. This crèche will contain 5 No. classrooms and includes a dedicated open space area for staff and children to utilise. The *Child Care Act 1991 (Early Years Services) Regulations 2016* sets out the following floor area requirements, which the subject proposed creche complies with:

(1)	(2) AGE RANGE	(3) CLEAR FLOOR SPACE
1.	0-1 year	3.5 square metres
2.	1 — 2 years	2.8 square metres
3.	2 — 3 years	2.35 square metres
4.	3 — 6 years	2.3 square metres

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant National Policy Documents.

7.0 STATEMENT OF CONSISTENCY – REGIONAL PLANNING POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within the *Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031*.

7.1 Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031

The *Regional Spatial and Economic Strategy* (“RSES”) for the East and Midlands Regional Assembly comprises a number of core Regional Policy Objectives which coincide with the NPF. The purpose of the guidelines is to direct all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

Under RPO 4.3 ‘Consolidation and Re-intensification’ the following objective is set:

‘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 coordinated with the delivery of key water infrastructure and public transport projects’.

The subject scheme will provide 562 No. residential units with a resultant density of 140 uph in the overall scheme, along with a café/restaurant and a creche. Therefore, the proposed development will result in the intensification of an underutilised, infill, brownfield site in a core urban location, in accordance with RPO 4.3.

The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the RSES states the following:

- 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’.

As stated previously in this Statement, the proposed development fully responds to the National Planning Policy, in particular Section 6.6 – *Urban Development and Building Heights Guidelines for Planning Authorities* and Section 6.7 – *Planning Design Standards for Apartments – Guidelines for Planning Authorities, 2025*.

The MASP for Dublin contained within the RSES notes the following 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 sustainably located subject site is positioned on a key route in and out of Dublin City Centre and is centrally located in proximity to high frequency public transport and employment

locations (most within walking and cycling distance). The scheme subject to this application is located on a large and underutilised brownfield plot fronting Milltown Road and Sandford Road and incorporates a significant quantum of public open space (35.3% of the developable site area).

It is our professional opinion that the proposed development provides an appropriate design response that will consolidate the surrounding residential land uses as per RPO 5.5. The site can absorb a higher density residential development with cultural/community floorspace, a crèche, a café/restaurant and public and communal open spaces at this location. The proposed development represents consolidated growth on a brownfield site. Supporting environmental reports and an EIAR have been enclosed alongside this Report to demonstrate the suitability of the site to accommodate the proposed development.

The RSES sets out the following in relation to 'Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking':

*'Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be achieved. This involves managing and facilitating the growth of Dublin and to increase the scale of our Regional Growth Centres to be able to provide the range of functions to their hinterlands. **This needs to be facilitated by appropriate, effective and sustainable infrastructure development in these centres, and at the same time avoid sprawl. This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure** - including broadband - in order to make the Region more connected and competitive. This will help to deliver high quality jobs that are well-paid and sustainable.'* [Our Emphasis]

The proposed development is located on appropriately positioned lands in close proximity to a range of public transport and business districts/major centres of employment including the Canal Ring, the Docklands, Harcourt Street, Ballsbridge, Sandyford Business District and Belfield Office Park. We note that many of these business districts and employment locations are within walking and cycling distance of the site. Furthermore, University College Dublin and 4 No. hospitals are located within walking and cycling distance of the site.

The proposed scheme addresses the economic strategy by providing an appropriate, effective and sustainable development by virtue of the high-quality design and higher density residential development in a central and/or accessible location preventing urban sprawl. Appropriately located residential accommodation within Dublin is important to the continued growth and maintenance of Ireland's competitiveness in the residential market. In addition, the inclusion of community/cultural spaces, a café/restaurant and a creche will create jobs for the area.

Under Section 8.1, the RSES states the following with regard to integrating land use and transport planning:

'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'

The subject development contributes to consolidated growth and the reduction in carbon emissions through lower parking standards and the provision of 1,343 No. bicycle parking spaces.

Through the provision of green and blue roofs, landscaping, tree protection and planting, the development also helps maintain a high standard of natural and green infrastructure within an intensified and denser residential setting. The substantial quantum of public and communal open spaces provided within the development will also significantly enhance the green infrastructure of the area and will also contribute to sustainable settlement patterns by providing permeable routes through these spaces and the overall site.

By virtue of its close proximity to key public transport, employment locations, services and facilities, the subject development can be seen as encouraging sustainable development patterns, seeking to increase density, reduce car dependency, and provide permeability throughout the scheme. Therefore, the subject development contributes to consolidated growth, towards the reduction in carbon emissions and represents a sustainable settlement pattern and is thus in accordance with Section 8.1.

Under Section 8.2, the RSES discusses responses to urban sprawl and justification for the move towards compact growth:

*'The Strategy aims to provide a spatial framework to **promote smart compact growth** as an alternative to continued peri-urban sprawl around our cities and towns, with a resultant negative impact on the environment and people's health and wellbeing due to increased commuting and loss of family and leisure time.'* [Our Emphasis]

The subject development seeks to provide a welcoming and attractive alternative to a car dominated development, which is well located in proximity to high-quality public transport, employment locations, services and facilities. Car parking is predominately provided at basement level (288 No. representing c. 90% of the total provision) allowing for maximum use of the available surface level amenity spaces.

Additionally, the development comprises c. 19,337 sq m of public and communal open space at ground level, representing 45.5% of the wider site area, in addition to 109 sq m provided in an upper-level external communal terrace, with a creche and community/cultural space, which will aid in the facilitation and promotion of healthy lifestyles and social cohesion.

The development promotes compact growth in accordance with Section 8.2. Similarly, the location of this higher density development close to public transport and proximate to major employers (and services and facilities) allows for reduced commuting times and greater work-life balance for future residents.

The RSES Objective RPO 9.4 states that in relation to new apartment developments:

*'Design standards for new apartment developments **should encourage a wider demographic profile which actively includes families and an ageing population.**'* [Our Emphasis]

It is our opinion that there is a significant opportunity to densify this area of Dublin with a mix of studio, one, two and three bedroom units, which will better serve the demographic profile of the City, allowing people to purchase their first home or to trade down from large houses to

smaller units in a high quality parkland and historic building setting. Also, 139 No. units out of the total 556 No. apartment units proposed (25% of the apartment units) have been designed to Universal Design standards which provides suitable living standards for older people or people who are less abled.

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant Regional Policy Documents.

8.0 STATEMENT OF CONSISTENCY – LOCAL PLANNING POLICY

8.1 Zoning

The subject site is zoned Z12 'Institutional Land (Future Development Potential)' in the *Dublin City Development Plan 2022-2028*. The stated aim of this land use zoning is:

"To ensure existing environmental amenities are protected in the predominantly residential future use of these lands".

Please see the zoning map of the *Dublin City Development Plan 2022-2028* below which demonstrates the Z12 zoning of the site.

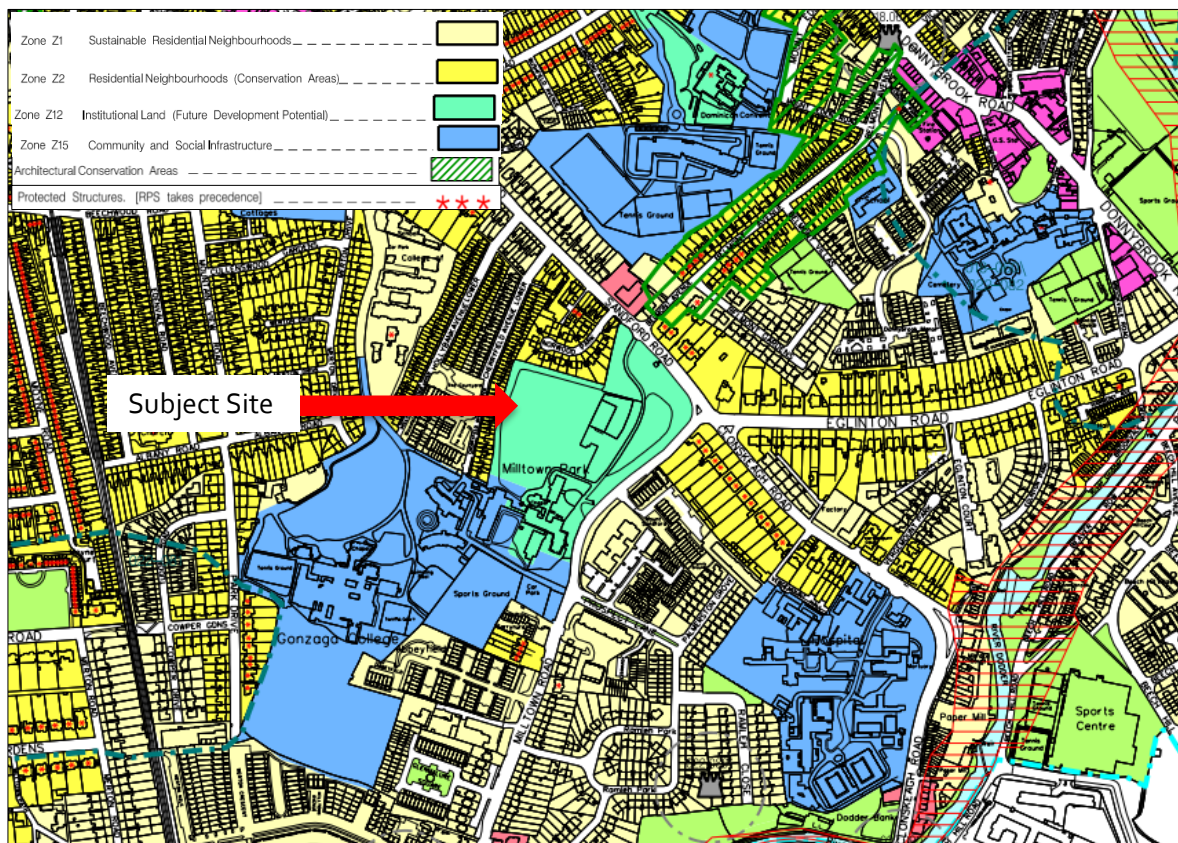


Figure 8.1: Zoning Map Demonstrating the Z12 Zoning Pertaining to the Subject Site (Green Coloured Corner Site)

(Source: *Dublin City Council Development Plan 2022-2028*, annotated by Thornton O'Connor Town Planning, 2025)

As demonstrated in Table 8.1 below, 'residential', 'café' / 'restaurant', 'childcare facility', 'community facility', and 'cultural/recreational building and uses', are all 'Permissible Uses' on Z12 zoned land as set out in Section 14.7.12 of the *Development Plan*. Therefore, the proposed 562 No. residential units, café/restaurant, creche, and cultural/community floor space are appropriate uses on the subject Z12 zoned lands, in accordance with the *Development Plan*.

Assisted living/retirement home, bed and breakfast, buildings for the health, safety and welfare of the public, café/ tearoom, childcare facility, community facility, conference centre, cultural/recreational building and uses, delicatessen, education, embassy

residential, enterprise centre, garden centre/ plant nursery, golf course and clubhouse, guesthouse, halting site, home-based economic activity, hostel (tourist), hotel, live-work units, media associated uses, medical and related consultants, open space, place of public worship, primary health care centre, public service installation, residential, residential institution, restaurant, shop (local), sports facility and recreational uses, training centre.

Table 8.1: Permissible Uses on Z12 Zoned Lands

(Source: *Dublin City Council Development Plan 2022-2028*)

We note that the site was previously zoned Z15 'Institutional and Community' in the previous *Dublin City Development Plan 2016-2022*. The Z15 zoning still pertains to the wider landholding including the retained Jesuit lands and Gonzaga College as they continue to provide Institutional uses on these sites.

Please see the image below in Figure 8.2 prepared from O' Mahony Pike Architects, which highlights the land uses across the entirety of the newly zoned Z12 lands and wider Z15 lands.

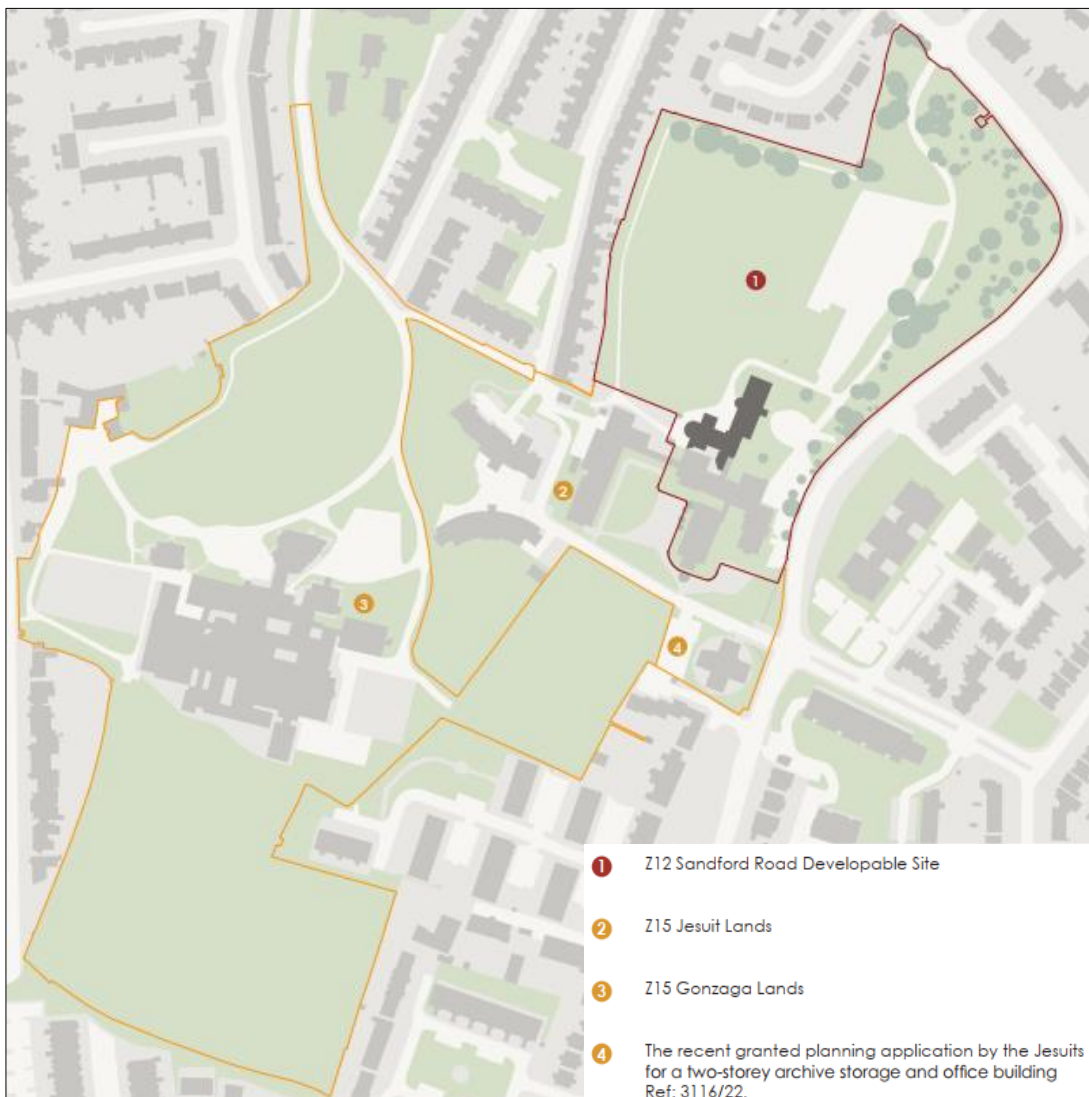


Figure 8.2: Image Demonstrating the Land Uses at the Subject Location

(Source: *O' Mahony Pike Architects, 2025*)

In summary, the lands can be broken down as follows:

1. Developable Site

Building range within the subject red line boundary which were formally utilised by the Jesuit Community at Milltown Park for institutional purposes from the 1850s. It has been confirmed by the Jesuit Community that the lands are surplus to their requirements due to a decline in vocations and are no longer required for the purposes of its function and mission. As a result, the buildings are currently vacant and have become impossible to maintain. It is noted that these lands were always in private use and the buildings and the lands subject to development were never publicly accessible lands.

2. Milltown Park Campus (Retained Jesuit Lands)

The Jesuits have retained these institutional lands to the south/south-west of the proposed development, which addresses their future operational needs due to this decline in vocations, and they will also retain the separate access already established from Milltown Road. The Jesuits have invested substantially in these lands in recent years to cater for their future operational needs in terms of residential accommodation and training. These lands currently comprise the Cherryfield Lodge Nursing Home and Milltown Park Community House. In addition, planning permission was granted by Dublin City Council for a new modern archive building (DCC Reg. Ref. 3116/22) within the retained Jesuit lands, lands that were retained for this purpose (see No. 4 on the map above). We also note that under Reg. Ref. 3866/20 (ACP Reg. Ref. ABP-311552-21) the link between Milltown Park House Rear Extension (within the site subject to this LRD application) and the red brick building within the adjacent Jesuits' lands was demolished and a 2.4 metre high boundary wall is provided to separate the subject site from the retained Jesuit lands. The proposed development can facilitate future potential links to the remaining Z15 institutional lands through the wall should this be required in the future, if the retained Jesuit lands become further surplus to requirements and are redeveloped.

3. Gonzaga College

The third parcel of land is occupied by the Gonzaga College Secondary School. Gonzaga School has always been a separate use and the lands were purchased at a later date to the main Jesuit campus in the 1950s. The subject development building range and lands and the school are separated functionally and physically from the other. The tenuous relationship between the subject group and the school in particular will therefore be unaffected by the severance of links between the two.

With regard to Z12 zoned lands, the *Development Plan* states that “these are lands, the majority of which are or which have been in institutional use, which may be developed for other uses in the future”.

The subject lands have not been in institutional use since 2015 when the institutional operations on the site ceased permanently, and the property was vacated by the Jesuits in 2019. In the previous SHD Application at the subject site, a letter was received from the Jesuit Community which confirmed that “the former Jesuit Community property...is no longer required by the Society for the purposes of its functions and mission”. An updated letter has been received from the Jesuit Community, dated 1st June 2023, and reiterates this fact. Please refer to Appendix A of this Report. The letter notes that the Jesuit Community has “experienced a

dramatic decline” and confirms that the application lands became surplus to their requirements and had become impossible to maintain, which lead to their sale in 2019. The Jesuit Community has retained the residential and administration accommodation to the south of the application lands with a separate access already established from Milltown Road. The letter confirms that the Jesuit Community considered their “future requirements thoroughly and have confirmed that the lands retained are adequate for their future needs. Planning permission was recently granted by Dublin City Council for a new modern archive building (DCC Reg. Ref. 3116/22) within the retained Jesuit lands, lands that were retained for this purpose”.

The application site has always been in private use and was not open or accessible to the public as confirmed in the letter, and the Society never provided any community facilities on site. The public have never enjoyed any right of access to these privately owned lands.

We note that the *Development Plan* sets out the following requirements in relation to the extent and layout of public open space on Z12 zoned lands as well as general development principles:

“Where lands zoned Z12 are to be developed, a minimum of 25% of the site will be required to be retained as accessible public open space to safeguard the essential open character and landscape features of the site. Where such lands are redeveloped, the predominant land-use will be residential.

In considering any proposal for development on lands subject to zoning objective Z12, other than development directly related to the existing community and institutional uses, Dublin City Council will require the preparation and submission of a masterplan setting out a clear vision for the future development of the entire landholding.

In particular, the masterplan will need to identify the strategy for the provision of the 25% public open space requirement associated with any residential development, to ensure a co-ordinated approach to the creation of new high-quality public open space linked to the green network and/or other lands, where possible. In addition, development shall have regard to the standards in Chapter 15.

On Z12 lands, the minimum 25% public open space shall not be split up into sections/fragmented and shall comprise soft landscape suitable for relaxation and children’s play, unless the incorporation of existing significant landscape features and the particular recreational or nature conservation requirements of the site and area dictate that the 25% minimum public open space shall be apportioned otherwise.

Where there is an existing sports pitch or sports facility on the Z12 lands subject to redevelopment, commensurate recreational/social infrastructure will be required to be provided and retained for community use where appropriate as part of any new development (see also Chapter 10: Green Infrastructure and Recreation, Policy GI49).”

A Masterplan has been prepared for the site and has incorporated all the requirements of the Z12 zoning objective including public open space. In line with the specific text of the Z12 zoning objective, the 'predominant' use of the site is proposed to be residential. Cultural/community space, a café/restaurant and a creche will also be provided to cater for the local community.

The development will have a significant positive impact due to the sustainable utilisation of these lands that are currently completely closed off from the public, which are proximate to public transport, employment locations, services and facilities. The site has always been in

private use, and this will be replaced by a high-quality, aesthetically pleasing development providing 562 No. residential units, a large quantum of public open space and many permeable links through the site, which will be a significant planning gain for the area, and thus will be consistent with the proper planning and sustainable development of the area. This section demonstrates that the proposal is fully in accordance with the policies and objectives of the Z12 zoning pertaining to the site.

The proposed development requires 25% of the site area to be designated as public open space in accordance with the Z12 zoning objective. The developable site area is 42,547 sq m which therefore requires the provision of 10,637 sq m public open space:

The public open space is provided as follows:

- **Public Park and Plaza Area Connected Through the Triple Height Undercroft of Block A1:**

c. 10,879 sq m (c. 25.57% of the c. 42,547 sq m developable site area)

- **Additional Public Open Space:**
 - **Woodland Glade (3,000 sq m)**
 - **Boulevard (575 sq m)**
 - **Garden Café Area (569 sq m)**

c. 4,144 sq m (c. 9.74% of the c. 42,547 sq m developable site area)

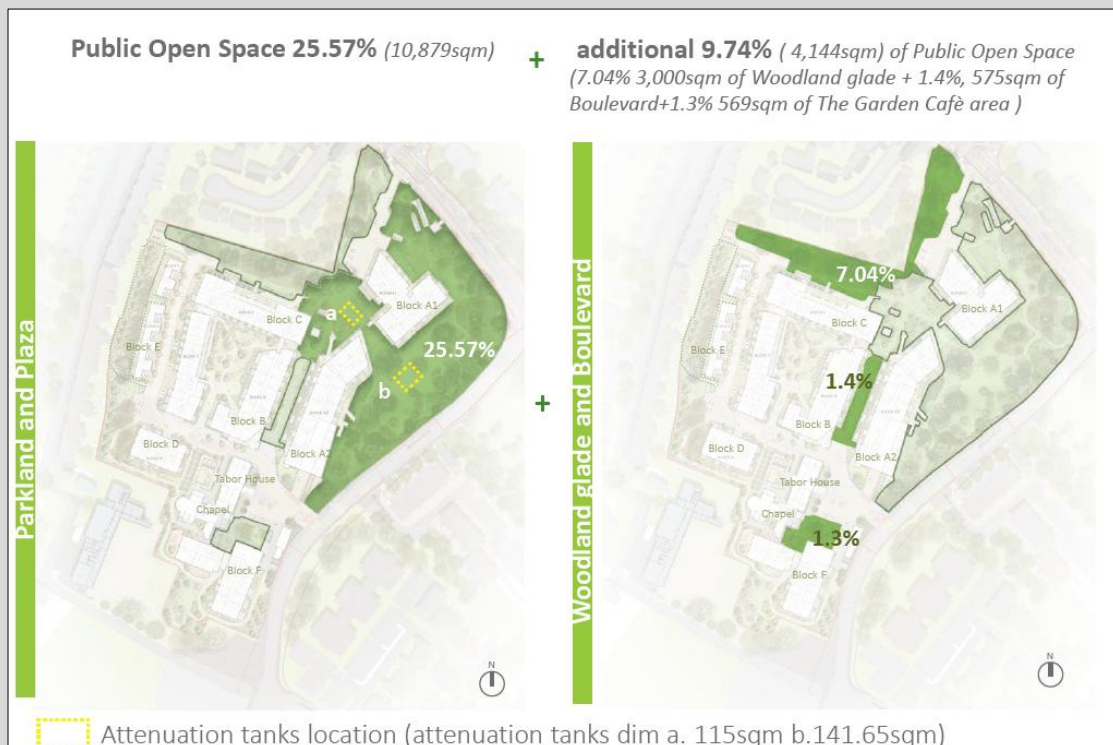


Figure 8.3: Public Open Space Provision at the Application Site

(Source: Cameo and Partners Design Studio, 2025)

Therefore, a total of 15,023 sq m (c. 35.3% of the developable site area) has been designated as public open space which significantly exceeds the requirement to provide 25% public open space.

The majority of this space (25.57%) will be provided in the public park and the plaza area which are linked through the triple height undercroft of Block A1. This triple height linked archway through Block A1 will create a strong connection between the public park and the public plaza and thus it is clear that the required 25% public open space has not been split up. The plaza area will not allow vehicular access to ensure a safe and attractive space is provided for pedestrians.

We note that the large parkland within the eastern and northern portion of the site is currently significantly overgrown and inaccessible and this space will be transformed by the subject development and will become a significant public amenity for the area. The eastern and northern portion of the site will now comprise a new public park which will open up the lands to the community for the first time as the lands have always been in private use.



Figure 8.4: Image of Current Dark and Overgrown Area Which will be Made Useable as Part of the Proposed Development

(Source: CMK Horticulture & Arboriculture Ltd, 2025)

Natural play facilities for the scheme have been provided at various locations throughout the public open space, specifically aimed at children to reconnect with nature and there will also be opportunity for adult engagement through natural gym equipment. There will also be seating provided throughout the site.

We consider that the provision of a high-quality useable public park at the site with a connection to the public plaza area will be a significant planning gain for the area, allowing access to previously inaccessible private lands. The plaza area will provide a meeting point for the public to sit and talk. The open space provided in the site will be high-quality and functional and will provide a wide variety of activities for the residents and public to utilise. The public open space

will be provided within soft and hard landscaping consisting of high-quality and functional public open space, which includes publicly accessible walkways, grassland, benches, jogging route, fitness areas and play-on-the-way for example. Therefore, it is clear that the public open space comprises soft landscaping that is suitable for relaxation and children’s play.



Figure 8.5: CGI of Part of the Public Open Space Showing People Jogging, Walking and Kids Playing

(Source: 3D Design Bureau, 2025)



Figure 8.6: Illustration of Part of the Public Open Space Showing Seating Areas, Cyclists and Kids Playing

(Source: Cameo and Partners, 2025)

In addition to public park and plaza area connected through the triple height undercroft of Block A1, public open space will also be provided to the north of Block C (known as the Woodland Glade) which is positioned adjacent to the plaza. This Woodland Glade represents c. 7.04% of the site area (or c. 3,000 sq m) and will provide further amenity on site in excess of the 25% requirement. The Woodland Glade will work together with the park and plaza as an entire connected public open space and mostly contains a native wildflower meadow which will provide important habitat for insects. The educational element of this Woodland Glade will be a positive addition to the public open space provision in the development.

In addition to utilising the eastern public park/plaza, the public can also utilise the pedestrian connection from Milltown Road and Sandford Road through the pedestrian boulevard between Blocks A and B. Landscape planting and seating has been incorporated into the Boulevard to provide useable and enjoyable public open space (575 sq m).

A new area of public open space has been introduced to the scheme which wasn't provided as part of the previous LRD 1 or SHD application. This includes 'The Garden Café' Area located in the forecourt between Block F, Tabor House, the Chapel and the Milltown Road access. This forecourt area will provide social space for members of the public and will provide a hub of activity as people enter the site. The café/restaurant at the ground floor of Block F and the cultural/community space in Tabor House and the Chapel will provide passive surveillance onto this space.

The entrance from Sandford Road will be a secondary vehicular entrance, principally for taxis, set down and deliveries with a small element of mobility impaired parking and there will be no vehicular access allowed to the plaza area, which will ensure this area is a high-quality public space.

The scheme layout will improve legibility in the area, and the proposed development will integrate into the surrounding context having regard to the open spaces in addition to the permeable links, the height transitions, the setbacks provided from boundaries and the breakdown in massing provided. The rejuvenation of the Chapel and Tabor House within the development will also contribute towards the assimilation of the scheme into the surrounding environment and the improved character of these structures will benefit from enhanced views via the newly proposed entrance from Milltown Road.

The proposed development balances the need to densify this sustainable urban site in order to consolidate the city while also appropriately setting back the development from surrounding areas. The development will enhance the local area by providing permeable links and a large quantum of high-quality public open space for the locality, which provides for the recreational and amenity needs of the population.

The proposed development will significantly contribute to housing supply by converting previously inaccessible, private lands to publicly available housing units with large open spaces and will also contribute to the city's strategic green infrastructure networks by providing public routes through the site within the landscaping layout. The development will thus facilitate connections for the public through the site towards the Dodder Greenway route and other green infrastructure areas, which will positively contribute to, and create linkages with, the surrounding strategic green network. It is clear that the proposed development will significantly contribute to the green infrastructure of Dublin City. In addition, we note that there are multiple pedestrian points provided to access the public open space from outside the site. The

Masterplan also facilitates a future link from the application site to the remaining Z15 Jesuit lands should this link be required at a future date.

The scheme is in accordance with Section 14.6 of the *Development Plan*, which notes that abrupt transitions in scale and use should be avoided in areas proximate to other zoning objectives. The development has set back much of the development from the surrounding areas having regard to the extensive public open space provided and, in addition, the western boundary is made up of modest 2 No. storey houses for example, which highlights that the proposed development has appropriately considered the transition between the development and surrounding spaces. Chapter 15 of the *Development Plan* has also been duly considered to ensure the proposal will integrate with surrounding lands i.e. such as in relation to height, plot ratio, site coverage, green infrastructure and urban greening. We note there is no existing sports pitch or sports facility currently existing on the subject lands.

The rejuvenation and integration of the Chapel and Tabor House within the development will also contribute towards the assimilation of the scheme into the surrounding environment and the improved character of these structures will benefit from enhanced views via the newly proposed entrance from Milltown Road. A significant effort has been made by the Design Team to provide well-considered and interesting building forms which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area and thus will appropriately integrate with the surrounding area.

To conclude this section, the proposed development which comprises 562 No. residential units with a creche, community/cultural spaces, a café/restaurant and public and communal spaces is consistent with the zoning objective pertaining to the lands.

8.2 Architectural Conservation Area and Protected Structures

The site is located in proximity to an Architectural Conservation Area (ACA). Policy BHA7 of the *Development Plan* notes the following in relation to ACAs:

"(a) To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area, and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.

(b) Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA.

(c) Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.

(d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.

(e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.

(f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within ACAs.

All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access, or requires removal to protect other specimens from disease."

In addition, Policy BHA2 states that it is a Policy of Dublin City Council to "Protect Structures included on the RPS from any works that would negatively impact their special character and appearance."

The subject site is not located within an Architectural Conservation Area (ACA), however the Belmont Avenue/Mount Eden Road Architectural Conservation Area is located to the north of the site.

The sensitive status of the ACA has been duly considered as part of the design process of the subject scheme having regard to the following:

- The natural set back provided between the site and the ACA due to the position of Sandford Road which runs between the northern boundary of the site and the southern boundary of the ACA;
- The position of built forms within the site which are set back from the northern boundary with Sandford Road; and
- The provision of public open space along this northern boundary naturally ensures that the building forms are set back from the ACA.

In addition, the proposed development has comprehensively considered the nearby Protected Structures in the vicinity along Sandford Road and Clonskeagh Road in the scheme layout. The large parkland provided with significant tree cover along the northern and eastern boundaries results in the building forms being set back from the boundaries, which will ensure that the development is appropriately screened as viewed from the Protected Structures opposite on Sandford Road and Clonskeagh Road.

We note there are existing dwellings located in Norwood Park between Protected Structures to the north-west of the site and the subject development. Nonetheless, there is a large area of public open space provided along this northern boundary which will provide a natural setback between the subject development and the Protected Structures. Therefore, it is considered that the character of the Protected Structures will not be materially impacted by the proposed development.

The EIAR Architectural Heritage Chapter (Chapter 7) prepared by Molloy and Associates for notes the following in this regard:

"Accordingly, considerable effort has been made to retain the sylvan character of the boundary separating the development site from protected structures on Sandford Road and Clonskeagh Road, which, whilst outside the ACA, frame the character of Belmont Avenue.

Notwithstanding measures taken to mitigate impacts, the proposed scheme will alter the current character of lands and consequentially, views from the surrounding areas. However, interpretation of the LVIA deems that those changes are modest and do not adversely change the character of protected areas and fabric and their settings.

The view of the Sandford Road entrance and the mature tree canopy that extend above it is prominent at the south end of Belmont Avenue. The vegetative buffer along the northern and eastern site boundary obscures present vistas of the extant building complex. The outward character of Milltown Park is defined by this enclosing boundary wall and mature tree planting which will remain unchanged by the proposed development.

Although the parkland was not purposefully designed as an integral part of the early suburban streetscape, the mature planting now contributes to its leafy character and effectively screens outward views from within the ACA. Whilst larger in scale than surrounding residences, which are predominantly 2-3 storeys in height, the considered positioning of the new residential development at a respectful distance from the perimeter of the site, inside the established tree boundary, effectively screens the new structures and inherently reduces the potential for visual impact.

The landscaping design concentrates on protecting and supplementing the existing vegetative buffers between the protected structures to the north-east and the subject lands. Open spaces have been designed to protect and meaningfully incorporate specimen trees at perimeters.

The proposed development is designed within a parkland setting, exploiting previously private lands that were inaccessible to the public since the site's evolution in the 18th century.

The Belmont Avenue/Mount Eden Road ACA does not have access to a public park.

Its architectural character, being defined by dense terraces could benefit from open space such as that provided by the subject development, providing 30% open space. Increased footfall through the site from established residential communities from the west and vice versa, will, albeit indirectly, enhance the connectivity of the ACA to linear parks to the west, generating a positive amenity for the quality of the historic urban environment.

Visual connections through the depth of the parkland amenity, previously denied by the hostility of the boundary wall to the east of the site, will be established with the ACA."

8.3 Built-form: Site Coverage, Plot Ratio, Height & Density

Development management standards and thresholds relating to site coverage, plot ratio, height and density work in conjunction with each other to define the bulk and scale of a development. This is then articulated and defined to distribute the massing as an appropriate and attractive built-form.

8.3.1 Site Coverage and Plot Ratio

The site coverages and plot ratios set by Appendix 3 of the *Development Plan* and are noted as being “indicative”, thereby indicating flexibility with respect to their applicability.

The *Development Plan* defines site coverage as:

“Site coverage is a control for the purpose of preventing the adverse effects of over development, thereby, safeguarding sunlight and daylight within or adjoining a proposed layout of buildings. It is a tool that is particularly relevant in urban locations where open space and car parking standards may be relaxed.”

The *Development Plan* defines plot ratio as:

“Plot ratio can help control the bulk and mass of buildings. It expresses the amount of floorspace in relation (proportionally) to the site area. Plot ratios can determine the maximum building floorspace area or volume on a given site, but on their own cannot determine built form. The same area or volume can be distributed on a site in different ways to generate different environments. Plot ratio should, therefore, be considered in conjunction with other development control measures including site coverage, building heights, public and private open space, parking provision etc.”

The site coverage and plot ratio for the proposed development are provided below alongside the indicative standards outlined in the *Development Plan*.

Parameter	Site Coverage	Plot Ratio
<i>Development Plan</i> ('Outer Employment and Residential Area')	45-60%	1.0-2.5
Proposed Development	20.65%	1.18

Table 8.2: Indicative Plot Ratio and Site Coverage for the Subject Site Set by the *Development Plan* and Proposed as Part of this Application

(Source: *Dublin City Development Plan 2022-2028, Thornton O'Connor Town Planning, 2025*)

The proposed development is within the plot ratio limitations prescribed by the *Development Plan* demonstrating the appropriateness of the overall development and the extent of the open space provided on the site.

The site coverage is lower than the indicative range prescribed by the *Development Plan*, demonstrating the concerted efforts made by the Design Team to ensure that the proposal does not result in overdevelopment of the site. In this regard, the carefully arranged buildings and their taller, yet modulated, heights maximise opportunities to provide substantial areas of open space (35.3% public open space) and generous separation distances from neighbouring

properties while still delivering a range of uses for the benefit of the local community (creche, café/restaurant and cultural/community space) and a large quantum of residential units for the local area. Accordingly, the lower site coverage represents a design-led response that achieves density through height and spacing rather than site dominance, thus delivering a more balanced, sustainable, and amenity-led form of development.

8.3.2 Building Height

Appendix 3 of the *Development Plan* considers that it is national and regional planning policy to appropriately increase density and building heights on underutilised lands located within core urban areas in order to promote compact growth, consolidation, prevent further sprawl and address climate change.

The *Development Plan* seeks to accommodate a more flexible approach to the attainment of height and allow a more locational based assessment to be carried out, having been directed by SPPR¹ of the *Building Height Guidelines* which states:

"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." [Our Emphasis]

In this regard, Appendix 3 of the *Development Plan* promotes innovative, mixed-use developments comprising buildings generally of 5 No. to 8 No. storeys in height in the following locations across Dublin:

- City Centre and within the Canal Ring (inner suburbs)
- Strategic Development Zones (SDZ's)
- Local Area Plans (LAPs)
- Strategic Development Regeneration Areas
- Key Urban Villages
- Former Z6 Industrial Lands
- Public Transport Corridors

The subject site is not located within a Strategic Development Regeneration Area, is not subject to a Strategic Development Zoning designation or Local Area Plan, does not form part of a Key Urban Village, and was not zoned Z6 in previous Development Plans.

Although the subject site is not located within the Canal Ring, we note that the "City Centre and within the Canal Ring (inner suburbs)" location includes reference to 'inner suburbs' which is defined in Section 4.5.2 of the *Development Plan* as follows:

"The inner suburbs comprise the established suburban communities, largely, located outside of the canal belt e.g. such as Phibsborough and the outer city refers to the newly developing areas on the fringe of the city administrative area including Clongriffin-Belmayne, Ashtown/Pelletstown, Park West and Cherry Orchard." [Our Emphasis]

The next definition of 'inner suburbs' is provided after the definition of an 'inner city' location in the Glossary of the *Development Plan*, which states the following:

"Inner city (see also city centre): The inner city is bounded on the northside by the North Circular Road, Phibsborough Road, the Royal Canal, North Strand Road and East Wall Road, and on the southside by the South Circular Road, Suir Road, the Grand Canal from Dolphin Road to Grand Canal Street Upper, Bath Avenue, Londonbridge Road, Church Avenue and Beach Road.

*Inner suburbs (see also outer city): **Those areas beyond the inner city (see definition above) which comprise the 19th century built-up areas, including Drumcondra, north Phibsborough, Rathmines and Ballsbridge.**" [Our Emphasis]*

The Glossary also provides the following definition of 'outer city':

"Outer City (see also Inner suburbs): Those areas generally between the 19th century urban areas/villages and the city boundary."

Milltown Park's existing entrance is located on Sandford Road, which is in Ranelagh. Ranelagh, as well as the nearby Donnybrook, are clearly established suburban communities located just outside the canal belt and cannot be described as 'outer city' locations, as per the above definition, as neither are classed as a "newly developing area". Ranelagh and Donnybrook clearly comprise the 19th century built-up area. At a more sit-specific level, Milltown Park House was provided on site in 1756; Tabor House dates from 1875; and The Chapel dates from 1895.

Ultimately, the subject site is an infill, corner site within an already established neighbourhood and is not of a similar character to the outer city locations such as those listed in the *Development Plan*: Clongriffin-Belmayne, Ashtown/Pellestown, ParkWest and Cherry Orchard. These 'outer city' locations are less-established areas than the inner suburbs as they are located²¹ further from the City Centre²² and Canal belt²³ and closer to the M50, as demonstrated in Table 8.3 below.

Location	Distance from City Centre	Canal Belt
Clongriffin-Belmayne	8.9 km	7.5 km
Ashtown / Pellestown	5.8 km	4.2 km
Park West	7.9 km	4.7 km
Cherry Orchard	7.7 km	4.5 km
Subject Site	3.2 km	1.5 km

Table 8.3: Approximate Distances from the Subject Site and 'Outer City' Locations to O'Connell Bridge and the Canal Belt

(Source: Distances Gathered from Google Maps, Table Generated by Thornton O'Connor Town Planning, 2025)

²¹ We have taken the centre of Phibsborough, Clongriffin-Belmayne, Ashtown/Pellestown, Park West and Cherry Orchard based on the location of services, facilities and/or public transport. All measured distances are taken 'as the crow flies'.

²² We have used O'Connell Bridge as the central location of Dublin City Centre due to its highly accessible location in the heart of Dublin City Centre.

²³ Measured from the Canal belt's closest point to the chosen location, i.e. the closest part of the Canal belt to Clongriffin-Belmayne is near Newcomen Bridge whereas the closest part of the Canal belt to the subject site is near the junction of Grand Parade and Leeson Street Upper.

Having regard to the above, it is our professional planning opinion that 'inner suburbs' accurately represents the locational characteristics of the subject site rather than 'outer suburbs' or 'inner city'. However, while the subject site may be considered to fall within the "City Centre and within the Canal Ring (inner suburbs)" location, to avoid ambiguity, it is noted that the subject site also falls within the "Public Transport Corridor" location.

Appendix 3 notes that "higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station", including a BusConnects stop and Luas stop. There are two bus stops located directly outside the subject site along Sandford Road which will serve the future BusConnects route Nos. 86, 87 & 88. The subject site is also located only c. 1-km walk from the Beechwood Luas stop and slightly over 500-metres from the future Bray to City Centre Core Bus Corridor along Donnybrook Road and Stillorgan Road, which already facilitates the E1 & E2 BusConnects routes.

Furthermore, when considering locations for greater height and density, the *Development Plan* states that all schemes must have regard to the local prevailing context /height, which is defined in Appendix 3 as follows:

"This is the most commonly occurring height in any given area. It relates the scale, character and existing pattern of development in an area. Within such areas, there may be amplified height. This is where existing buildings within the streetscape deviate from the prevailing height context, albeit not to a significant extent, such as local pop up features. Such amplified height can provide visual interest, allow for architectural innovation and contribute to a schemes legibility."

Due to the scale of the site at 4.26 Ha, Milltown Park has a completely varied prevailing context, which dictated the height (and density) of the proposed development throughout the site. For example, there is a 6 No. storey apartment block referred to as 'Millbrook Court' opposite the subject site along Milltown Road and thus the greatest height of the development (8 No. storeys) is proposed within the eastern extent of the site. Similarly, there are 2 No. and 3 No. storey houses to the west of the site and thus the height of the buildings proposed gradually steps down to the proposed 2 No. storey houses within the western portion of the site. Additionally, given the significant separation distances from the proposed buildings to nearby properties, greater heights can be achieved in this location without causing a material impact on those properties as demonstrated in the application documents.

We also note that the SHD and LRD 1 applications both proposed taller building heights with Block A1 previously designed up to 10 No. storeys, whereas it is now proposed as 8 No. storeys in this LRD 2 scheme. The Planning Inspector concluded in their assessment of the SHD application that the "height and massing of the development proposed has been specifically designed to sit in a parkland setting in order to absorb the scale of the buildings" and that the development "will 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 nearby development". The DCC Planner in their assessment of the LRD 1 application concluded that the "the height of the proposal could be successfully integrated into the area without causing undue harm to the visual amenities of the wider area", while the Planning Inspector concluded the following:

"At the scale of the neighbourhood there would be capacity to absorb buildings at the height proposed. I am also satisfied that the scale of the site and the layout of development, would readily allow for development at the heights proposed. The zoning

*and characteristics of the site have dictated that no development is provided along the road frontage of the site with proposal to provide for significant levels of public open space and retain existing trees. This approach means the development is setback significantly from the roadside boundaries and **the height of structures is suitably modulated**. The building heights proposed would be in accordance with national policy and guidance to support compact consolidated growth within the footprint of existing urban areas.” [Our Emphasis]*

The height of the proposed development has been thoroughly considered having regard to the location of the site in proximity to a “Public Transport Corridor”, the surrounding urban context and the need to sustainably and appropriately re-develop this highly underutilised site. The proposed development will include a range of building heights between part 2 No. to part 8 No. storeys with numerous setbacks provided at different floor levels to ensure there is a varied and interesting design. The proposed height strategy will assist in achieving the optimum density for the proposed mixed-use scheme whilst being cognisant of the surrounding context.

8.3.3 Density

Dublin City is the most densely populated settlement in the state, however it does not reach the levels of density seen in many major cities around the world. Towards the city core there are several examples of high-density areas, yet the majority of the metropolitan area of Dublin consists of lower densities which are more typical of suburban typologies.

Aligning with the policies and objectives of the *NPF* and other relevant national planning policy, the *Development Plan* recognises that there is a need to increase densities and promote compact growth on suitably located, underutilised, brownfield lands within the urban area in order to prevent further sprawl and address the challenges of climate change. Specifically, Section 4.5.3 of the *Development Plan* states that:

“The goal is to provide for a compact city with attractive mixed-use neighbourhoods, a variety of housing types and tenure, adequate social and community infrastructure and adaptable housing, where people of all ages will choose to live as a matter of choice.”

The *Development Plan* further provides the following policies relating to sustainable densities and compact growth:

Policy QHSN10 (Urban Density):

“To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.”

Policy SC11 (Compact Growth):

*“In alignment with the Metropolitan Area Strategic Plan, to **promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:***

- *enhance the urban form and spatial structure of the city;*

- *be appropriate to their context and respect the established character of the area;*
- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*
- *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.” [Our Emphasis]*

Evidently, there is supporting policy within the *Development Plan* which promotes greater densities in sustainable locations, particularly on underutilised, brownfield lands. The subject site is eminently suitable to provide a higher density development given its location in proximity to public transport services, employment centres and facilities, services and amenities. The redevelopment and densification of the subject underutilised, brownfield lands will provide much needed housing in an accessible location and achieve sustainable compact growth by providing a mix of uses, a variety of housing types and tenure, and people friendly and accessible spaces for people of all ages and abilities.

In addition to the general policies and objectives relating to density and compact growth, the *Development Plan* prescribes a series of residential density ranges for developments across the city area. Table 1 of Appendix 3 of the *Development Plan* sets out the following density ranges for Dublin City:

Location	Net Density Range (dwellings per hectare)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

Table 8.4: Density Ranges for Different Locations within Dublin City

(Source: *Dublin City Development Plan 2022-2028*)

Having regard to the above, it is considered that none of the categories listed in Table 1 of Appendix 3 accurately represent the locational characteristics of the subject site. It has already been discussed in Section 8.3.2 above that the subject site does not fall within the definition of an ‘outer suburb’ as it is not located in a newly developing area; rather it falls within the definition of an ‘inner suburb’ given it is located beyond the inner city, within the 19th century built-up area and forms part of an established suburban community. Therefore, none of the density ranges in Table 1 can be strictly applied to the proposed development, in our opinion, as there is no density ranges set for the ‘inner suburbs’.

Although the subject site does not strictly fall within any of the categories listed in Table 1 of Appendix 3 of the *Development Plan*, in our opinion, the proposed density is considered to be consistent with the guidance set out in national planning policy for accessible locations within established neighbourhoods, such as the subject site. We firmly contend that the density is appropriate for the subject site and is not precluded by the categories and their density range listed in Table 1 of Appendix 3 of the *Development Plan*; rather, it is ultimately supported by broader local, regional and national planning policy. It will deliver a density uplift which is much

needed to ensure compact growth and the efficient use of the brownfield and underutilised land within the built-up area.

Section 15.5.5 of the *Development Plan* states that the Council “will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the **Section 28 guidelines which seeks to consolidate development within existing urban areas.**” [Our Emphasis]. As demonstrated in Section 6.8 above, the proposed density of 140 dph accords with the *Compact Settlement Guidelines*’ (Section 28 Guidelines) density range applicable to the subject site which is 50 - 250 dph. The *Development Plan* has not been updated to reflect the greater emphasis placed by the *Compact Settlement Guidelines* on residential density, housing standards and placemaking to support the sustainable and compact growth of settlement. The *Compact Settlement Guidelines* clearly reflects the content of the NPF in that it recognises the benefit of securing greater densities in existing urban areas to achieve scale, critical mass, vibrancy and a positive shift in infrastructural use.

We also note that a higher density was accepted by An Comisiún Pleanála in the SHD Application²⁴ where some 667 No. units were granted on the subject site. The An Coimisiún Pleanála Inspector, in their assessment of the 157.5 uph density, noted the subject site “is the right location for new housing in Dublin City at an appropriate height, the right quantum and at an efficient residential density” and that “the development of higher density residential development is entirely appropriate”.

This was also the case in the LRD 1 application as a higher density was accepted by both Dublin City Council and An Comisiún Pleanála where some 636 No. units were granted²⁵ at a proposed residential density of 149.8 units per hectare. The DCC Planning Officer considered the density of the LRD 1 application “to be suitable given its location and it is noted that the site is within walking distance to Luas and a number of bus routes.” The DCC Planner concluded that the “density is considered to be suitable given its location and it is noted that the site is within walking distance to Luas and a number of bus routes”, while the Planning Inspector concluded the following:

*“I would be of the view that **the site is suitable site for increased densities** based on both national local planning policy and have no reason to consider that the density proposed is excessive unless other factors such as overall quality of development, visual impact, scale and physical impact on adjoining properties demonstrate to contrary (including the criteria under Table 3, Appendix 2) [sic].....The proposed development in this location **would not contradict density standards contained in the Development Plan 2022-2028** which advocates an approach of consolidation and densification in the city and the proposed density **complies with Government policy to increase densities on underutilised lands within core urban areas** in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change.” [Our Emphasis]*

It should also be noted that the provision of a higher proportion of studios, 1-bed units and 2-bed units within the subject scheme also disproportionately inflates the density figure and should be considered in this context.

²⁴ Currently remitted back to the An Coimisiún Pleanála

²⁵ Currently subject to a Judicial Review.

8.3.4 Compliance with Table 3 of Appendix 3 of the *Development Plan*

The *Development Plan* requires all proposals with significant increased height, scale and density over the existing prevailing context to demonstrate full compliance with the performance criteria set out in Table 3 of Appendix 3. It is considered useful to respond to these criteria for the purpose of assessing the appropriateness of the building height and density proposed at the site, even though the density guidance set out in the *Compact Settlement Guidelines* (Section 28 Guidelines) is adhered to and the scheme does not exceed the 'general' 5 No. to 8 No. storey building height range promoted by the *Development Plan* in certain locations in Dublin City (e.g. public transport corridors).

Informed by the above, the table below has been prepared and sets out the objectives and criteria of Table 3 from Appendix 3, as well as responses illustrating how the proposed development complies with them. These various 'performance criteria' of Table 3 are set out under 10 No. 'objectives' in the *Development Plan*:

1. To promote development with a sense of place and character;
2. To provide appropriate legibility;
3. To provide appropriate continuity and enclosure of streets and spaces;
4. To provide well connected, high quality and active public and communal spaces;
5. To provide high quality, attractive and useable private spaces;
6. To promote mix of use and diversity of activities;
7. To ensure high quality and environmentally sustainable buildings;
8. To secure sustainable density, intensity at locations of high accessibility;
9. To protect historic environments from insensitive development; and
10. To ensure appropriate management and maintenance.

Objective	Criteria	Compliance
1 – To promote development with a sense of place and character	Respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints.	<p>The approach to the proposed design and its delivery of height has been conscious of the proximity of the subject site to surrounding properties, whilst acknowledging the large extent of the subject site which can, in part, dictate its own height. Consideration has also been given to height as an integral aspect of a structure's overall design, in terms of modulation, massing and aesthetic. These matters are then balanced against national, regional and local policy's emphasis on compact growth and more efficiently and sustainably using land within existing settlement.</p> <p>The subject site is prime for redevelopment and the delivery of a high-quality scheme which will assimilate into the area. The scheme will promote a sense of place and character especially due to the animation of activity provided along the streetscape at an important street junction, opening up the site for the public to utilise.</p>

		<p>The scheme respects and responds to the surrounding existing and proposed developments by facilitating generous separation distances to nearby residential properties and providing gradual transitions in height throughout the site. For example, Block E (2 No. storey houses) has been strategically positioned to the west of Block C (5 No. storeys with a 4 No. storey element to the north and pop up of 7 No. storeys to the south) to provide an appropriate transition in height to the neighbouring 2/3 No. storey dwellings in Cherryfield Avenue Upper and Lower. The proposed modulation in height contributes to a broken and dynamic skyline with the various range in heights across the site and reduces the perceived bulk of the buildings. This subsequently avoids blanket building heights which can result in a monotonous urban realm.</p> <p>We note that lower building heights and greater separation distances to neighbouring residential dwellings are proposed as part of the subject LRD 2 proposal compared to the previous SHD and LRD 1 applications. For example, Block E previously comprised 3 No. storey duplexes in the SHD and LRD 1 applications, with the closest separation distance to the residential dwellings in Cherryfield Avenue Upper and Lower being c. 20-metres in the SHD and c. 22-metres in the LRD 1 application. Block E now comprises 2 No. storey houses that are located at a generous separation distance of c. 30-metres from the neighbouring dwellings.</p> <p>The proposed development seeks to retain the most valued elements of built and natural heritage to the advantage of the development and surrounding area by retaining a large extent of the existing tree planting within the western, north-western, northern and eastern boundaries, retaining the long stone wall along the eastern boundary, and offering new views of Tabor House from the public realm along Milltown Road. The site strategy has also duly considered the proximate Architectural Conservation Area (Belmont Avenue ACA) and Protected Structures and it is considered that</p>
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		<p>the development will have minimal impact on their setting.</p> <p>The design approach has clearly sought to respect the existing, established and proposed surrounding urban structure, character and local context, scale, built and natural heritage, and residential amenity, whilst according with relevant national, regional and local planning policy. It is acknowledged that the proposed development will result in some degree of change to the character of the local area. However, having regard to national, regional and local planning policy which promotes compact growth and the appropriate re-use and densification of highly underutilised, accessible sites (such as the subject site), in our opinion, any development on the subject site would have similar effects to the local character.</p>
	<p>Have a positive impact on the local community and environment and contribute to 'healthy placemaking'.</p>	<p>Despite its extensive size, the subject site lacks any activation and passive surveillance along Milltown Road and Sandford Road. This is due to the long stretch of walls along the eastern and northern boundaries, with only one entrance point to the site provided along Sandford Road, as well as the site always having been in private ownership and not open to the public.</p> <p>The proposed development seeks to open up the site and provide permeable links along by providing an additional vehicular entrance to the site along Milltown Road and additional pedestrian entrance at the corner of the site and the junction of Milltown Road and Sandford Road. The proposed boundary treatment will also contribute positively to activating the streetscape by replacing the existing concrete render wall along the Sandford Road boundary with a low wall and railing to allow views in and out of the site.</p> <p>Overall, the proposed development will result in the redevelopment and regeneration of a large brownfield, corner site, thereby enhancing the public realm and the healthy placemaking through the creation of a more attractive and desirable environment. Open spaces and permeable links are proposed and</p>

		<p>will provide areas within which the public and community can play, socialise and exercise. Additionally, the provision of open spaces, a crèche, café/restaurant, community/cultural spaces aid in the facilitation and promotion of healthy lifestyles and social interaction between residents and the public, which will ultimately result in the creation of a strong sense of community.</p> <p>The only commercial use included in the SHD application was a creche while LRD 1 included a creche and cultural/community space. LRD 2 will provide an additional commercial use for the new residents and the wider community to enjoy, namely a café/restaurant is proposed at the ground floor of Block F. The café/restaurant has been strategically located to provide active frontage to the forecourt area between Block F, Tabor House and the new access road to the site.</p>
	<p>Create a distinctive design and add to and enhance the quality design of the area.</p>	<p>The proposed design is thoroughly detailed in the documentation prepared by OMP Architects. The development will significantly improve the aesthetic of the subject site, which has been separated from the public by the currently oppressive boundary wall. The permeable links and public open spaces provided throughout the site will enhance the public realm and will enhance the quality design of the area.</p> <p>The carefully designed, shaped and modulated development creates an attractive proposition at this corner location, which will enhance the streetscape, improving the relationship of the site with the surrounding area and will allow the residents and wider community to integrate.</p> <p>As noted in Chapter 9.0 of the EIAR (Landscape and Visual Impact Assessment):</p> <p><i>“By responding to specific elements, features and characteristics of the site and the context, the proposed design – in layout, arrangement of built form (height, massing, stepping) and open space, materials, landscaping and boundary treatments – is bespoke, distinctive, and appropriate to the site and context.”</i> [Author’s Emphasis]</p>

	<p>Be appropriately located in highly accessible places of greater activity and land use intensity.</p>	<p>The site is within a c. 13 No. minute walking distance to the Green Line Luas (Beechwood).</p> <p>In addition, there are a number of proximate bus stops that provide a plethora of bus routes. As discussed in Section 3.4.3 above, we have considered the combined frequency and range of destinations provided by all bus routes serving a single bus stop within 1-km of the subject site, when assessing how accessible a site is in terms of its proximity to a 'high-quality bus service'. In this regard, the high-quality bus services in proximity to the subject site includes bus stop Nos. 855, 884, 775, 758, 773, 772 & 760. Of note, bus stop Nos. 855 & 884 are located directly outside the subject site along Sandford Road. These bus stops offer peak hour weekday frequencies ranging between every 1-minute up to every 25-minutes.</p> <p>The Green Line Luas links with the Red Line Luas in the City Centre i.e. interchange at O'Connell Street / Abbey Street etc., which ultimately leads to various Train Stations e.g. Heuston Station and Connolly Station. The Green Line Luas frequency is every 3-5 No. minutes during peak hours and every 12 – 15 No. minutes frequency during off-peak hours. The proximity of the site to high frequency public transport provides opportunities for residents of the scheme to travel to significant employment locations and business districts such as the Canal, the Docklands, Harcourt Street, Ballsbridge, Sandyford Business District, Belfield Office Park and neighbourhood centres such as Ranelagh, Donnybrook and Rathmines. The majority of these areas are also located within cycling and walking distance of the site.</p> <p>Therefore, the site is easily linked with the rest of the City. The development will, in its own right, increase the activity and land-use intensity at this location by way of its mix of uses. See Section 3.0 above for full details of the site's locational attributes and connectivity.</p>
	<p>Have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a</p>	<p>Variation in height, scale and form have been detailed in response to the first criterion above. The approach has sought to respect the surrounding properties, by modulating heights</p>

	<p>site/adjacent development in an established area.</p>	<p>throughout the site and providing large separation distances from surrounding properties. The proposed scheme is presented in various forms and heights across the site, transitioning from the lower heights along more sensitive boundaries to the highest forms which are positioned at the least sensitive locations such as fronting Milltown Road and Sandford Road, fronting the public park, and towards the centre and southern portions of the subject lands.</p> <p>We note that 2 No. storeys are provided adjacent to the residential dwellings (Cherrywood Avenue Upper and Lower) along the west of the site which provides a transition in height between the neighbouring residential dwellings and the proposed part 4 No. to part 7 No. storey Block C further within the site. Block C also gradually increases in height from 4 No. storeys to 5 No. storeys and again to 7 No. storey as it steps further back from the northern boundary with Norward Park. In this regard, the 4 No. storey element is located c. 32.5-metres from the closest neighbouring dwelling before stepping up to 5 No. storeys located c. 38-metres from the same dwelling, and again to 7 No. storeys which is generously set back from the neighbouring dwelling by c. 90-metres.</p> <p>It is noted that the closest separation distance between Block C and the Norward Park dwellings (c. 32.5 metres) is c. 1.71 times the height of the part 4 No. to part 5 No. section of Block C (c. 18.975-metres in height) which is considered to be a generous separation distance to building height ratio.</p> <p>Similarly, the closest separation distance between Block A1 and the Norward Park dwellings (46.5-metres) is c. 2.9 times the height of the 5 No. storey section of Block A1 (c. 16-metres in height) which is considered to be a generous separation distance to building height ratio. As the height increases up to 8 No. storeys in Block A1, so does the separation distance to the Norwood Park dwelling at c. 66-metres.</p> <p>Elsewhere, the height transitions to principally between 5 and 8 No. storeys at the least</p>
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		<p>sensitive locations which will avoid any abrupt transitions in scale and height from neighbouring residential dwellings, therefore the positioning of the higher building forms has been subject to detailed consideration to ensure that the scheme can be assimilated into the receiving environment.</p>
	<p>Not be monolithic and should have a well considered design response that avoids long slab blocks.</p>	<p>The scheme has been designed to ensure interesting and relieved facades have been provided to reduce the perceived mass and scale of the blocks. As discussed, the height varies across the site and the orientation of the blocks also alternates throughout the scheme layout which demonstrates that the blocks have been broken down to ensure that the scheme will not represent a monolithic form. Each block has a subtle shift in direction as a response to its particular urban condition and the variations in façade treatment and materials contributes to the avoidance of a monolithic appearance. Furthermore, the high-quality open spaces and permeable links provide visual relief throughout the scheme.</p> <p>An interesting feature of the scheme is the views provided through the site from outside through the new entrance points. In addition, views through the triple-height undercroft within Block A will allow for an interesting journey for the pedestrian, and views from the north of the site towards Tabor House will be visible through the colonnade at the setback ground and first floor levels of Block B, which demonstrates that the proposal has been well considered as the massing of the blocks has been broken down to provide large areas of open space, visual links and pedestrian pathways through the scheme.</p> <p>The <i>Masterplan & Architectural Design Statement</i> prepared by O' Mahony Pike Architects sets out the rationale for the design approach and how conscious efforts have been made to provide architecturally interesting forms and spaces and notes that the proposed Block A linear element is comparable to the constructed Mount Saint Anne's development in Milltown and serves to provide good edge containment to the open space. It is clear that a significant effort has been made to provide well</p>

		<p>considered and interesting building forms which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area.</p>
	<p>Ensure that set back floors are appropriately scaled and designed.</p>	<p>The setting back of upper levels is proposed as a means to gradually increase heights, whilst respecting the existing and proposed surrounding properties and ensuring that residents will have daylight/sunlight access.</p> <p>As set out throughout this Report, excluding the single storey refuse & bike stores north of Block E and east of Block F, the development ranges from 2 No. to 8 No. storeys, with the higher forms positioned at the least sensitive locations throughout the site.</p>
<p>2 – To provide appropriate legibility</p>	<p>Make a positive contribution to legibility in an area in a cohesive manner.</p>	<p>The design, scale and rhythm of the built-form make the scheme a highly legible proposition. The treatment of the eastern boundary of the site gives better definition to the important junction of Sandford and Milltown Road, a key arterial crossroads between Milltown, Clonskeagh, Donnybrook and Ranelagh.</p> <p>The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area especially due to the provision of public open spaces including a new park and pedestrian links through the site, which will ensure the legibility, permeability and quality of the public realm in the vicinity of the subject site is enhanced.</p>
	<p>Reflect and reinforce the role and function of streets and places and enhance permeability.</p>	<p>The proposed development will redefine the building line and streetscape at this prominent street junction and will activate the ground floor of Block F and all of Tabor House and the Chapel by providing cultural/community space and commercial uses. In particular, the café/restaurant in Block F has been strategically positioned to face onto the forecourt area in front of Block F and Tabour House to increase levels of passive surveillance.</p> <p>The improvements to permeability and safety for pedestrians is also a significant planning gain. Each space and street is designed to have a particular function and identity, whether for public or communal use, and for circulation or</p>

		recreation. The proposed landscaping and layout of public open spaces will enhance permeability for the site so that residents and members of the public will be able to navigate their way around the site easily.
3 – To provide appropriate continuity and enclosure of streets and spaces	Enhance the urban design context for public spaces and key thoroughfares.	<p>The provision of permeable links throughout the site (public park and pedestrian boulevard) and the opening up of the site as viewed from Milltown Road and Sandford Road represent key planning gains for the wider neighbourhood, which will enhance the urban design of the surrounding public realm.</p> <p>The provision of a large quantum of public open space will be a significant benefit to the local community, including a new public park. The proposed development provides key thoroughfares through the site with numerous pedestrian links provided, making it a more inviting and hospitable environment.</p>
	Provide appropriate level of enclosure to streets and spaces.	<p>The approach to the design has sought to create a new built and active street edge along the streetscape and to appropriately redefine this street edge away from the existing boundary wall. While majority of the existing stone boundary wall along the eastern boundary of the site will be retained due to its architectural significance, the concrete rendered wall along the northern boundary will be replaced with a low wall with railing so views can be provided into and out of the site for increased levels of passive surveillance. These boundary treatments provide appropriate enclosure to streets and spaces.</p> <p>We note that the internal streets are minimal within the site which allows for safe pedestrian and cyclist legibility through the site. Setbacks in height are provided at each proposed block to ensure they do not overbear any open space and internal streets while still providing an appropriate level of enclosure and overlooking onto these spaces for the safety of future residents and the public.</p>
	Not produce canyons of excessive scale and overbearing of streets and spaces.	The tallest element of the proposed development is 8 No. storeys, however the modulation and variation in heights is such that it ranges from 2 No. storeys to 8 No. storeys,

		<p>with single storey reduce & bike stores also provided.</p> <p>The predominant linear arrangement of the blocks assists with breaking down the massing of the development which ensures that the development will not be excessive or overbearing. The large open spaces provided will also contribute towards the breaking down of the perceived massing. In this regard, 35.3% of the developable site will be public open space and 10.4% developable site will be communal open space. Therefore, 45.7 % of the developable site will comprise open spaces which is a significant quantum of space that will be benefit the public / community / future residents and demonstrates that the development will not be excessive.</p> <p>The avoidance of monolithic built-form that fails to connect to the context and is not of human scale has been a priority of the Design Team.</p>
	<p>Generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3.</p>	<p>During the design development of the scheme, careful consideration was given to achieving a human scale throughout the site. Building heights have been intentionally varied to respond to local context, with increases in height positioned either adjacent to existing taller elements or used strategically to provide visual accents at key nodes along the central axial route. This variation supports legibility, wayfinding, and connectivity, reinforcing a clear and intuitive movement structure through the development.</p> <p>A number of specific design features demonstrate how the scheme engages with the pedestrian experience at a human scale. For example, Block A incorporates a three-storey archway, creating a generous and welcoming pedestrian connection between the main plaza and the public open space at the east of the site. Similarly, Block B includes a corner setback along the axial route, framing views toward the 'secret garden' behind Tabor House and improving the pedestrian experience.</p> <p>The taller built elements—namely, the eight-storey components of Blocks A1 and A2—are</p>

		<p>deliberately positioned to face substantial areas of public open space to the east and are visually softened by a surrounding tree belt. These locations ensure that the street width to building height ratios remain comfortably within the policy's required range, as the adjacent open spaces provide generous spatial buffers and prevent any sense of enclosure or over-dominance.</p> <p>The resulting arrangement enables the perceived height of the buildings to assimilate effectively with the surrounding context. The scheme establishes generous internal separation distances and adopts a graduated height strategy, rising from the existing two-storey houses to the west toward the proposed taller elements set against a mature green edge to the north and east. This approach ensures that the development reads as balanced, proportionate, and comfortably scaled for users of the public realm.</p> <p>Collectively, these measures create a scheme that is firmly within a human scale, creating proportional relationships between buildings and the spaces they define.</p>
	<p>Provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.</p>	<p>The subject site currently lacks any passive surveillance along Milltown Road and Sandford Road due to the long stretch of walls enclosing the site. As such, the proposed development seeks to increase levels of passive surveillance along these roads by replacing the rendered wall along the northern boundary with a low wall and railing to ensure views into and out of the site is provided as well as introduce new access points along the site's boundaries to increase permeability and activity in and around the site. These measures will inevitably result in more 'eyes on the street' and a safer environment for future residents and the local community.</p> <p>All open spaces and streets are overlooked by residential units, the café/restaurant, creche or the community/cultural space. All entrances will be sufficiently overlooked and new streets, spaces and connections will create visual interest for the surrounding streetscape and provide permeable connections for the</p>

		<p>residents and wider public. The community/cultural spaces, the café/restaurant and creche will also generate additional animation along the street level and the park will be an attractive meeting point for the local community and residents and thus the development will promote activity throughout.</p> <p>All ground floor entrances to the proposed blocks and own-door entrances to individual units have been strategically located along the internal street network or public open spaces to ensure the safety of residents.</p>
<p>4 – To provide well connected, high quality and active public and communal spaces</p>	<p>Integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport.</p>	<p>New public open space areas, an important aspect of creating an attractive urban realm and streetscape, are proposed. In particular, the large public park will be an attractive addition to the area in addition to permeable connections provided through the site for pedestrians and cyclists. The opening up of the site to members of the public for the first time will be a significant benefit to members of the local community and future residents as it has always been in private ownership. Carefully designed planting and surfaces have been proposed by Cameo and Partners Design Studio that will benefit existing and future residents.</p> <p>The scheme prioritises pedestrians and cyclists by providing majority of the site’s car parking at basement level, creating a pedestrian and cyclist friendly environment at street level. The proposed development also provides 1,343 No. cycle parking spaces which will encourage future residents, staff, and visitors to cycle to/from the site rather than using the private car.</p> <p>The sites proximity to public transport and employment locations is evidence of efforts to integrate higher density development with higher quality sustainable modes of transport.</p>
	<p>Be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards.</p>	<p>A balance was sought by the Design Team between securing open and accessible, but also attractive and safe public open spaces. The large public park will be overlooked by Blocks A1 and A2 which ensures that the space is appropriately enclosed.</p>

		<p>The layout of the public open space also allows views into and out of the site as the cement rendered wall along Sandford Road will be replaced with a low wall and railing which will visually open the site up to the public and will enhance legibility in the area.</p> <p>The residential communal courtyard between Blocks B & C will be enclosed by built form, and the space will be gated for resident access only, allowing a balance between enclosure and exposure. The residential communal open space proximate to the Chapel/Block D/Block F (Walled Garden) will also be gated for residents use only.</p> <p>The development provides a good balance between providing easily accessible public open spaces in addition to some gated communal spaces for resident use.</p>
	<p>Ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities.</p>	<p>As set out in the <i>Daylight and Sunlight Assessment Report</i>, the external amenity strategy is highly effective. While some individual spaces are naturally shaded due to building orientations and some spaces will have the pleasant, dappled shade of a woodland setting, there are also spaces that will enjoy prolonged sunlight access. The aggregate 'Sun on Ground' performance is excellent. Future residents will have access to a variety of outdoor spaces, ranging from the enclosed 'Belvedere Garden' to the bright, open 'Parkland & Plaza'. This diversity ensures year-round usability.</p>
	<p>Ensure the use of the perimeter block is not compromised and that it [is] ²⁶ utilised as an important typology that can include courtyards for residential development.</p>	<p>The western portion of the site comprises 2 No. storey courtyard houses located to the east of the dwellings in Cherryfield Avenue Upper and Lower. We note that LRD 1 proposed 3 No. storey duplex units within this area which were closer to the neighbouring dwellings than the proposed LRD2 smaller 2 No. storey courtyard houses.</p> <p>Block B & C is provided in the centre of the site which encloses a communal courtyard. This space will be an attractive and safe location for residents to relax and socialise. Therefore, the</p>

²⁶The word [is] is missing from the *Development Plan*.

		<p>use of the perimeter block is not compromised in the proposed development, rather it allows the provision of high-quality communal open space to be provided in the centre of the development.</p>
	<p>Ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated.</p>	<p>A Pedestrian Wind Comfort Study was carried out by OCSC as part of Chapter 17 of the EIA (Microclimate – Wind) whereby it was concluded:</p> <p><i>"The proposed development has been designed to have acceptable pedestrian wind comfort conditions during the operational phase."</i></p> <p><i>"The pedestrian comfort at ground/street level is excellent throughout the development with the layout of the buildings and the existing and proposed trees having a significant positive effect in terms of mitigating excessive wind speeds."</i></p>
	<p>Provide for people friendly streets and spaces.</p>	<p>There will be limited vehicular activity within the subject scheme, which provides a public realm that prioritises ease of movement for pedestrians and cyclists.</p> <p>The internal street network and public spaces will be appropriately lit, where needed, and will avoid narrow and hidden corners to improve visibility and passive surveillance.</p> <p>The public and communal open spaces will be landscaped at a human scale. The improved public realm will be an attractive addition to the area. The communal open spaces for the residents will be an attractive environment to enjoy.</p> <p>The proposed café/restaurant proposed on the ground floor of Block F will increase footfall into the site and will be provided with outdoor seating for people to relax, socialise and enjoy the offerings of the café/restaurant. There is numerous seating areas also spread across the subject site which provides places for people to meet one another.</p>

5 – To provide high quality, attractive and useable private spaces	Not compromise the provision of high quality private outdoor space.	<p>Private amenity space is proposed for residents of the apartment as terraces or balconies and for residents of the houses as rear gardens and first floor terraces, as detailed in the documentation prepared by OMP Architects and Cameo and Partners Design Studio. These spaces meet and exceed the minimum requirements in terms of area.</p> <p>Ground floor terraces that interface with the public/communal amenity areas have adequate buffers to protect privacy and enhance residential amenity.</p>
	Ensure that private space is usable, safe, accessible and inviting.	As discussed above, private outdoor spaces are appropriately sized, located, designed and are provided with level access to each apartment unit or house.
	Ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards.	This aspect of the design has been considered and full details of the assessment are included in 3D Design Bureau's <i>Daylight and Sunlight Assessment</i> , which demonstrates significant compliance with the 3 rd Edition of BRE 209.
	Assess the microclimatic effects to mitigate and avoid negative impacts.	<p>A Pedestrian Wind Comfort Study was carried out by OCSC as part of Chapter 17 of the EIAR (Microclimate – Wind) whereby it was concluded:</p> <p><i>"The proposed development has been designed to have acceptable pedestrian wind comfort conditions during the operational phase."</i></p> <p><i>"The pedestrian comfort at ground/street level is excellent throughout the development with the layout of the buildings and the existing and proposed trees having a significant positive effect in terms of mitigating excessive wind speeds."</i></p>
	Retain reasonable levels of overlooking and privacy in residential and mixed use development.	<p>Inappropriate levels of overlooking have been avoided as part of the proposed development, with a balance struck between protecting privacy and residential amenity and ensuring adequate passive surveillance is secured.</p> <p>Ample separation distances and setbacks from surrounding properties have been proposed</p>

		<p>with further set-backs provided along the western boundary in particular, thereby ensuring that that the existing residences are not overlooked. In this regard, please refer to Section 5.5 above for details of the separation distances between residential units.</p>
<p>6 – To promote mix of use and diversity of activities</p>	<p>Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure.</p>	<p>In accordance with this criterion, whilst residential is the primary use, a creche, community/cultural space and a café/restaurant have been included to promote the mix of uses and diversity of activities across the site. Public open space is also proposed which will undoubtedly be a positive addition to the local area. Therefore, the proposed development will promote the delivery of a residential led mixed-use development which will generate job opportunities for the local area and will increase activity on the site and into the surrounding area.</p> <p>Furthermore, we highlight that the SHD proposal only included a creche and the LRD 1 proposal included a creche and cultural/community space.</p>
	<p>Contribute positively to the formation of a 'sustainable urban neighbourhood'.</p>	<p>Several factors illustrate the proposed development's contribution to the formation of a 'sustainable urban neighbourhood':</p> <ol style="list-style-type: none"> 1. A broadening of the housing stock will enhance the demographic and socio-economic composition of the local area; 2. The mix of uses will meet the needs of future residents, as well as existing residents, and will also provide opportunities for employment. This includes the newly introduced café/restaurant unit which was not included in LRD 1; 3. Additional local population will support the attainment of critical mass required to sustain local services and businesses; 4. Greater provision of local services and amenities reduces the dependency to travel further (and potentially use a car) to avail of same, aligning with the principles of the 15-minute city; 5. Low car parking provision, ample cycle parking and proposed car share services are considered means through which to

		<p>reduce car ownership and use rates to environmentally and socially sustainable levels;</p> <p>6. The provision of public open space and an enhancement of the road network, built-form and public realm in this area are much-needed given the blighted appearance of the existing site and its failure to provide notable aesthetic, social, ecological and economic benefits; and</p> <p>7. Redevelopment of a brownfield site minimizes urban sprawl into greenfield lands.</p>
	<p>Include a mix of building and dwelling typologies in the neighbourhood.</p>	<p>It is considered that the proposed development will have a positive impact on the character of the area, by transitioning the site from its underutilised nature to a higher density, contemporary scheme, in line with national policy discourse. The proposed development will enhance the existing housing stock in the neighbourhood by providing a mix of dwelling types (6 No. houses and 556 No. apartments) and sizes (70 No. studios, 176 No. 1-beds units, 267 No. 2-bed units, and 49 No. 3-bed units). The creche, café/restaurant and cultural/community space also contribute to the mix of uses proposed within the new and retained buildings.</p>
	<p>Provide for residential development, with a range of housing typologies suited to different stages of the life cycle.</p>	<p>As noted above, the proposed development will provide a mix of dwelling types and sizes to cater for a broad range of ages and abilities. Furthermore, they will add to the stock of housing in the area and broaden its mix given it is predominantly comprised of houses, with a smaller number of apartments in the vicinity.</p> <p>The units are designed to be adaptable and flexible in order to suit different stages of the life cycle. In this regard, 25% of all apartment units are universally designed and 50% of all apartments are oversized.</p>
<p>7 – To ensure high quality and environmentally sustainable buildings</p>	<p>Be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to</p>	<p>The modulation of height, which varies from 2 No. to 8 No. storeys, ensures that the proposed development is not monolithic in its built-form, with its scale and massing distributed appropriately.</p>

	<p>minimise overshadowing and loss of light.</p>	<p>Per the results of 3D Design Bureau's <i>Daylight and Sunlight Assessment Report</i>, the scheme performs well and we note that the design of the subject scheme has evolved through a creative process, in conjunction with the results of the <i>Daylight and Sunlight Assessment Report</i>, to ensure an attractive living environment for future residents which has a limited impact on the amenity of surrounding properties.</p> <p>Shifted height and massing allow for natural ventilation to be achieved, with no long, unbroken sections of building proposed. The height of the subject scheme modulates throughout the site depending on the block location.</p> <p>Privacy is secured by way of separation distances, planted screening/buffers, and offset windows and balconies.</p>
	<p>Not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain.</p>	<p>3D Design Bureau's <i>Daylight and Sunlight Assessment Report</i> for indicates that there will be limited impacts on surrounding properties, however the scheme has undergone numerous design iterations in order to minimise impacts on surrounding properties. Large setbacks have been provided from surrounding properties and this has been increased in LRD 2, particularly along the western boundary.</p>
	<p>Ensure a degree of physical building adaptability as well as internal flexibility in design and layout.</p>	<p>The design of the proposed development considers adaptability and the prospect of different uses in the future. The scheme provides 278 No. oversized units which represents 50% of the overall apartment and duplex unit provision. Of these, some 139 No. units are universally designed.</p> <p>The community/cultural spaces are flexible internally and layouts/uses will be agreed with Dublin City Council post-planning.</p>
	<p>Ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive.</p>	<p>OMP Architects have sought to minimise rooftop plant and infrastructure, as is demonstrated in their submitted architectural materials, as well as the CGIs and Verified View Photomontages prepared by 3D Design Bureau and assessed in Chapter 09 of the EIAR (Landscape and Visual Assessment). Rooftop</p>

		plant has been set back from the parapet's edge to ensure the least visibility.
	Maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage.	A total of 281 No. of the 556 No. proposed apartments are dual aspect in their design, equivalent to 50.5%. All of the houses are design as dual aspect, resulting in 287 No. of the total 562 No. residential units, equivalent to 51%, that are designed as dual aspect.
	Be constructed of the highest quality materials and robust construction methodologies.	This design principle has been applied in the proposed development. Rather than render, brick is the predominant material used, which is more robust and requires less maintenance and upkeep. The existing materials and approach to the proposed materials, which include different colours and textures, make the scheme visually accessible and intriguing.
	Incorporate appropriate sustainable technologies, be energy efficient and climate resilient.	<p>The <i>Energy & Sustainability Report</i> prepared by OCSC, which is submitted herewith, in concludes the following:</p> <p><i>"This report confirms that if the energy and sustainability strategy is successfully implemented, the proposed Sandford Road will satisfy all Part L, BER requirements, relevant climate actions policies of Dublin City Council and CAP 25 strategy. The development will incorporate energy efficiency and carbon reduction measures, including high-performance insulation, passive design techniques, and natural ventilation, as well as the integration of renewable energy technologies such as solar PV and air source heat pumps.</i></p> <p><i>Sustainable transport is promoted through the provision of substantial bicycle parking facilities and dedicated electric vehicle charging infrastructure. Adaptation to climate change is addressed through the inclusion of a high thermal performance façade to reduce unnecessary heat loss, the specification of high efficiency equipment, to reduce operating costs, as well as inclusion of other considerations such as an attenuation pond for sustainable surface water management. In addition, the development will feature landscaped green spaces and construction methods will prioritise the use</i></p>

		<p><i>of low-embodied carbon materials and the minimisation of construction waste where possible, consistent with national circular economy objectives.”</i></p> <p>Full details of the intended sustainable technologies, energy efficiencies and climate resilience are detailed in the accompanying <i>Energy & Sustainability Report</i>.</p>
	<p>Have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sun lighting proposals. Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or securing wider objectives such as comprehensive urban regeneration or an effective urban design and streetscape solution.</p>	<p>As noted previously, the scheme has evolved in tandem with the <i>Daylight and Sunlight Assessment Report</i>.</p> <p>We note that the <i>Daylight and Sunlight Assessment Report</i> by 3D Design Bureau sets out the compensatory design measures for the scheme in relation to the units that could be considered to be underperforming. These measures include large apartment sizes, dual aspect provision and large private terraces.</p>
	<p>Incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place.</p>	<p>For full details of the proposed water services strategy, please refer to the materials prepared by DBFL Consulting Engineers submitted herewith.</p> <p>Included in Section 3 of the <i>Infrastructure Design Report</i> submitted as part of this application, is details on the site’s compliance with surface water policy. The surface water strategy includes SuDS features such as green roofs, permeable paving, tree pits, bioretention areas and landscaped areas for example.</p>
	<p>Include a flood risk assessment.</p>	<p>A <i>Site-Specific Flood Risk Assessment</i> has been prepared by DBFL Consulting Engineers and is included under separate cover.</p>
8 – To secure sustainable density, intensity	<p>Be at locations of higher accessibility well served by public transport with high capacity frequent service</p>	<p>Please refer to Section 3.0 above and to the accompanying <i>Traffic and Transport Assessment</i> and the <i>Public Transport Capacity Assessment</i> prepared by DBFL Consulting</p>

<p>at locations of high accessibility</p>	<p>with good links to other modes of public transport.</p>	<p>Engineers for full details of the sites' accessibility and wider connectivity, which are summarised below.</p> <p>The site is well served by public transport such as the Green Line Luas (Beechwood Luas 1 km / c. 13 minutes walking distance) and bus stops which facilitates bus routes such as No. 11, 14, 39a, 44, 44D, S2, E1, E2 and the 700 (Aircoach service). The Green Line Luas links with the Red Line Luas in the City Centre i.e. interchange at O'Connell Street / Abbey Street etc., which ultimately leads to various Train Stations e.g. Heuston Station and Connolly Station. The Green Line Luas frequency is every 3-5 No. minutes during peak hours and every 12 – 15 No. minutes frequency during off-peak hours. The proximity of the site to high frequency public transport provides opportunities for residents of the scheme to travel to significant employment locations and business districts such as the Canal, the Docklands, Harcourt Street, Ballsbridge, Sandyford Business District, Belfield Office Park and neighbourhood centres such as Ranelagh, Donnybrook and Rathmines. The majority of these areas are also located within cycling and walking distance of the site.</p> <p>Furthermore, the following 4 No. hospitals are within close proximity to the subject site:</p> <table border="1" data-bbox="858 1339 1407 2033"> <thead> <tr> <th data-bbox="858 1339 1066 1373">Name</th> <th data-bbox="1066 1339 1407 1373">Distance</th> </tr> </thead> <tbody> <tr> <td data-bbox="858 1373 1066 1563">Clonskeagh Hospital</td> <td data-bbox="1066 1373 1407 1563"> → c. 450 metres → c. 3 No. minutes cycling distance → c. 6 No. minutes walking distance </td> </tr> <tr> <td data-bbox="858 1563 1066 1742">The Royal Hospital Donnybrook</td> <td data-bbox="1066 1563 1407 1742"> → c. 1.4 km → c. 5 No. minutes cycling distance → c. 17 No. minutes walking distance </td> </tr> <tr> <td data-bbox="858 1742 1066 1933">St Vincent's Hospital</td> <td data-bbox="1066 1742 1407 1933"> → c. 2.3 km → c. 7 No. minutes cycling distance → c. 26 No. minutes walking distance </td> </tr> <tr> <td data-bbox="858 1933 1066 2033">St Luke's Hospital</td> <td data-bbox="1066 1933 1407 2033"> → c. 2.9 km → c. 10 No. minutes cycling distance </td> </tr> </tbody> </table>	Name	Distance	Clonskeagh Hospital	→ c. 450 metres → c. 3 No. minutes cycling distance → c. 6 No. minutes walking distance	The Royal Hospital Donnybrook	→ c. 1.4 km → c. 5 No. minutes cycling distance → c. 17 No. minutes walking distance	St Vincent's Hospital	→ c. 2.3 km → c. 7 No. minutes cycling distance → c. 26 No. minutes walking distance	St Luke's Hospital	→ c. 2.9 km → c. 10 No. minutes cycling distance
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	<p>Look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.</p>	<p>A site coverage of 20.65% is proposed which demonstrates the concerted efforts made by the Design Team to ensure that the development maximises opportunities to provide substantial tracts of open space and generous separation distances from proximate developments. This has been largely achieved through the facilitating majority of the development's car parking at basement level</p>		

		<p>rather than surface level which would otherwise reduce the quantum and quality of open spaces and distances to neighbouring dwellings. By facilitating majority of the car parking at basement level, with access to the basement provided near the entrance to the Milltown Road entrance, a safe pedestrian and cyclist environment is also provided as the site is not dominated by cars. Any internal street which requires vehicular access for refuse or servicing has been designed with the safety of pedestrians and cyclists in mind.</p> <p>The scheme does not result in excessive height in order to achieve appropriate floor area (i.e. plot ratio). As demonstrated above, the plot ratio of the proposed development is 1.18 which is in accordance with Table 1 of the <i>Development Plan</i>.</p>
<p>9 – To protect historic environments from insensitive development</p>	<p>Not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments.</p>	<p>The site is located in proximity to Belmont Avenue Architectural Conservation Area (ACA), located to the north of the subject site. There are Protected Structures also located to the north on the opposite side of Sandford Road and to the east along Clonskeagh Road with additional Protected Structures located to the north-west along Sandford Road and to the south along Milltown Road (greater distance). The proximity of the site to the ACA and Protected Structures has been duly considered as part of the design process of the subject scheme and the proposed development is integrated with the character and cultural heritage of the surrounding area as set out as follows:</p> <ul style="list-style-type: none"> • The provision of public open space along the northern and eastern boundaries naturally ensures that the building forms are set back from the ACA and Protected Structures on Sandford Road and Clonskeagh Road; • The natural set back provided between the site and the ACA and Protected Structures due to the position of Sandford Road which runs between the northern boundary of the site and the southern boundary of the ACA/Sandford Road Protected

		<p>Structures and also due to the position of Milltown Road which runs along the eastern boundary of the site and the Protected Structures along Clonskeagh Road; and</p> <ul style="list-style-type: none"> • The position of built forms within the site which are set back from the boundary with Sandford Road. <p>Chapter 09 of the EIAR (Landscape & Visual Impact Assessment) considers the impact of the development on the nearby ACA and Protected Structures and notes that the proposed development “<i>would not dominate or otherwise negatively affect them</i>” and having regard to the high-quality design and material quality of the proposed development, then “<i>it would have no adverse effect on the setting of the protected structures or the ACA</i>”.</p> <p>The retention of Tabor House and the Chapel will benefit from their refurbishment to provide cultural/community space and their incorporation into a high-quality new urban neighbourhood/environment. The forecourt area in front of Block F, Tabor House and the Chapel will provide a respectful setting for the two historic buildings and will preserve the view of them from Milltown Road.</p> <p>There are no National Monuments located in proximity of the subject site.</p>
	<p>Be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed.</p>	<p>Chapter 8 of the EIAR (Biodiversity) has been prepared by DNV and we note the following conclusion:</p> <p><i>“Provided that the mitigation measures outlined in this report are implemented in full, including dust control, lighting management, noise reduction, and habitat protection, it is considered that the proposed development will not result in any significant adverse effects on valued habitats, designated sites, or individual or group species, including those associated with Dublin Bay and European sites within the zone of influence.</i>”</p>

		<p><i>In addition to mitigation, a suite of biodiversity enhancement measures has been proposed in tandem with the landscape plan. These include:</i></p> <ul style="list-style-type: none"> • <i>Extensive planting and sowing of native species, including trees, hedgerows, and wildflower meadows, to improve habitat diversity and ecological connectivity.</i> • <i>Installation of wildlife-supporting features such as Swift bricks, bird boxes, bat boxes, and invertebrate habitat, which will provide nesting and foraging opportunities for a range of urban-adapted and protected species.</i> • <i>Integration of green infrastructure elements such as biodiverse green and blue roofs, and pollinator-friendly planting to support ecosystem services.</i> <p><i>These enhancements are designed not only to offset any residual impacts but to deliver a net gain in biodiversity across the site. The landscaping plan proposes a substantial increase in the coverage of trees, hedgerows, grassland, and wildflower meadows at what is currently a predominantly unmanaged Site, with invasive alien flora species impacting on the quality of the scrub and woodland habitats it supports."</i></p> <p>In conclusion, the proposed development is therefore considered to result in an overall slight positive effect on the biodiversity of the Site via the landscaping plan, which proposes the retention and incorporation of the majority of existing woodland and trees at the site and a net increase in overall tree, scrub and wildflower meadow planting throughout, contributing to the ecological resilience of the site and wider surrounding area.</p> <p>Chapter 09 of the EIAR (Landscape and Visual Impact Assessment) notes the following as being the sensitive receptors in the receiving</p>
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		<p>environment of the subject site in terms of areas and elements / features of the townscape:</p> <ul style="list-style-type: none"> • Belmont Avenue ACA • Sandford Road, Clonskeagh Road, Eglinton Road and Cherryfield Avenue Residential Conservation Areas; • Norwood Park (zoned Residential Conservation Area); • The Protected Structures located in proximity to the subject site, including Nos. 132, 134, 136, and 138 Sandford Road, as well as the western end of St. James' Terrace on Clonskeagh Road; • The historic buildings on the site; and • The mature trees/woodland on the site. <p>In this regard, the LVIA measures the magnitude of change against the townscape sensitivity to be 'moderate'. However, the LVIA notes:</p> <p><i>"The Building Height Guidelines, National Planning Framework and DCDP 2022-2028 recognise that such change needn't necessarily be (or be considered to be) negative. Developments of scale, that cause change in the landscape character and the composition of views, can be designed with consideration of their context, so that their effects, while significant, are not unduly harmful to the receiving environment."</i> [Author's Emphasis]</p>
	<p>Assess potential impacts on keys views and vistas related to the historic environment.</p>	<p>No key views or vistas are identified at or within the environs of the subject site. Notwithstanding this, a detailed <i>Landscape and Visual Impact Assessment</i> has been prepared which assesses visual impacts more generally. Please see Chapter 09 of the EIAR for full details. In terms of the historic environment, the LVIA considers the impact of the development on the nearby ACA and Protected Structures and notes that the proposed development "<i>would not dominate or otherwise negatively affect them</i>" and having regard to the high-quality design and material quality of the proposed development, then "<i>it would have no adverse effect on the setting of the protected structures or the ACA</i>". We also note that the LRD 2 scheme has reduced in height and scale since the SHD and LRD 1.</p>

<p>10 – To ensure appropriate management and maintenance</p>	<p>Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.</p>	<p>The following reports have been prepared as part of this LRD application to guide the future maintenance and management of the proposed development:</p> <ul style="list-style-type: none"> • <i>Operational Waste Management Plan (appendix to the EIAR)</i> • <i>Property Management Strategy Report</i> • <i>Bicycle Parking Management Plan</i> • <i>Mobility Management Plan</i> • <i>Building Lifecycle Report</i> • <i>Landscape Design and Access Statement.</i>
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Therefore, having regard to the above points in response to Table 3 of Appendix 3 of the Development Plan, it is firmly contended that the proposed height and density can be absorbed at the subject site.

In summary, the height proposed in the subject scheme has taken the opportunity to explore the potential for increased height, scale and density. The height of the subject scheme is modulated throughout the site, principally ranging from 2 storeys to 8 No. storeys. It is our professional planning opinion that this large site has the capacity to absorb increased height and density as the site has significant frontage onto Milltown Road and Sandford Road and the site is positioned on a main arterial route into the city centre. The highest elements of the scheme are located at the least sensitive locations away from neighbouring residential properties and the lower elements positioned adjacent to these properties. It is considered that appropriate heights have been provided responding to the *Building Height Guidelines* as illustrated on the accompanying Architectural Drawings prepared by OMP Architects. An Bord Pleanála (now An Coimisiún Pleanála) and Dublin City Council were supportive of the height provision in LRD 1 with reductions in height and density now proposed in LRD 2.

8.3.2 Concluding Remarks

The proposed heights, which are detailed throughout this Report and in the materials prepared by OMP Architects, range from part 2 No. to part 8 No. storeys. As a result of careful modulation of the built-form and appropriate separation distances, in our opinion it is considered that these heights are respectfully and sympathetically achieved, cognisant of the surrounding properties. Yet, increased heights play an important role at the subject site by creating an aesthetically attractive and unique overall design in lieu of an existing underutilised site that does not represent sustainable development of prime brownfield lands.

8.4 Minimum Residential Development Standards

The subject development has been designed to accord with residential development standards as prescribed in the *Development Plan* and the *Apartment Guidelines*.

O' Mahony Pike Architects have prepared a Housing Quality Assessment Table (HQAT) which is enclosed as Appendix C of the *Masterplan + Architectural Design Statement*. This table provides a detailed breakdown of the quantitative standards affecting the development and includes an

assessment of the size of the units, floor areas of living and bedroom spaces, storage areas and open space for example.

8.5 Open Space

Open space in a general sense for development projects is categorised as public open space, communal amenity space and private open space. Public open space is publicly accessible land that future residents can use, as well as the existing local community or passers-by. Communal amenity space is semi-private in its intention and proposed for the use of future residents of a proposed development, thereby allowing for relaxation, socialising and integration. Private open space is provided on a dwelling-by-dwelling basis, with individual spaces designed solely for the private use by the residents of each unit.

The following sub-section in relation to open space and landscaping should be read in conjunction with the materials prepared by Cameo and Partners Design Studio.

8.5.1 Public Open Space

In relation to the provision of public open space, some 25% of the site area is required due to the Z12 zoning objective (as opposed to the 10% normally required for residential developments), thus 10,637 sq m of open space is required. With respect to public open space provision, the Design Team also recognises Policy GI28 ('New Residential Development') of the *Development Plan*:

"To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes."

The proposed development includes 15,023 sq m of public open space (35.3% of the development site area) which significantly exceeds the standards prescribed by the Z12 zoning. We further note that the majority of this space (25.57%) will be provided in the public park and the plaza area which are linked through the undercroft of Block A1. This linked triple height archway through Block A1 will create a strong connection between the public park and the public plaza. We reiterate that the plaza area will not allow vehicular access to ensure a safe and attractive space is provided for pedestrians. Play facilities for children will be provided throughout the public spaces. Please see further details in Section 5.0 above regarding the extent and layout of the public open space.

8.5.2 Communal Open Space

The communal open space standards of the *Development Plan* align with those set by the *Apartment Guidelines* and are set out below:

Minimum Floor Areas for Communal Open Space	
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. persons)	6 sq m
Two Bedroom (4 No. persons)	7 sq m
Three Bedroom	9 sq m

Based on the composition of the proposed 70 No. studios, 176 No. one-bed units, 54 No. 2-bed units (3-person), 213 No. two-bed units (4-person) and 43 No. three-bed units, the subject scheme has a requirement of 3,362 sq m of communal amenity space to meet the minimum standards outlined in the *Apartment Guidelines*.

The subject scheme includes 4,423 sq m of communal amenity space designed by Cameo and Partners Design Studio, which significantly exceeds the minimum requirement.

The development proposes to provide 4,314 sq m of communal open space at surface level, which represents 10.1% of the site area, in addition to 109 sq m of communal space at sixth floor of Block A1 ensuring that high quality communal open space is provided for future tenants. Thus, the proposed communal open space significantly exceeds the minimum communal amenity space standards.

It is noted that the *Development Plan* states that "...roof terraces will not be permitted as the primary form of communal amenity spaces". The Design Team wish to assert that the proposed communal terrace at the upper level is surplus to the surface level communal open space (which already exceeds the minimum standards). It is contended that the communal amenity spaces exceed the quantitative requirement and qualitative expectations for such areas.

8.6 Private Open Space (Apartments)

The private open spaces are being designed as balconies or terraces, with minimum depths of 1.5 metres and with areas that align with the minimum requirement of the *Development Plan*, which are informed by the *Apartment Guidelines*:

Unit Type	Private Open Space
Studio	4 sq m
1-bed	5 sq m
2-bed (3-person)	6 sq m
2-bed (4-person)	7 sq m
3-bed	9 sq m

All units have been provided with private open space in accordance with these minimum standards. Please see the Housing Quality Assessment Table prepared by OMP Architects.

8.7 Community / Cultural Space

The *Development Plan* notes the following Objective in relation to provision of communal / cultural spaces:

CUO25 SDRAs and Large Scale Developments:

"All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where*

it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.

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

In response, the development will provide high-quality community/cultural spaces within the refurbished and converted Tabor House and Chapel. An external pavilion (Secret Garden) is also provided to the rear of Tabor House.

The specific use and layout of these community/cultural spaces will be agreed with Dublin City Council via compliance post-planning. This is considered a reasonable approach as by the time planning permission is secured and the scheme is constructed, it will be c. 2-3 No. years and an appropriate end-user(s) will be found for the spaces at that juncture.

We understand that the requirement for community/cultural space is 5% of the net floor area (c. 38,431.5 sq m) of the scheme, resulting in a need for 1,922 sq m of space. This space within the Chapel will be c. 662 sq m and within Tabor House will be c. 1,036 sq m providing a total of c. 1,698 sq m internal community/cultural space. In addition, an external pavilion/secret garden to the rear of Tabor House and the Chapel will also be provided which measures c. 248 sq m, giving a total of c. 1,946 sq m, equivalent to c.5.1% of the development's net floor area.

Therefore, the provision of community/cultural space, which has been provided predominately internally, is in accordance with Policy CUO25 of the *Development Plan*.

The pavilion/secret garden to the rear of Tabor House will represent a natural extension to the proposed community/cultural space which can host a variety of events for the community or for the cultural occupiers.

8.8 Dual Aspect

Section 15.9.3 of the *Development Plan* stipulates that:

"Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate.

In prime city centre locations, adjoining or adjacent to high quality, high frequency public transport, 33% dual aspect may be accepted in locations where there are specific site constraints such as tight urban infill sites up to 0.25ha or where there is a need to maintain a strong street frontage. In the outer city (beyond the canal ring) and within the SDRA's, schemes with a minimum of 33% dual aspects units will only be considered in exceptional circumstances."

Although it has been determined that the subject site is a central and/or accessible urban location (with a target of 33% dual aspect), the proposed development has included 51% dual aspect units which exceeds the minimum requirements. This nature of the dual aspect units is detailed further in the *OMP Masterplan + Architectural Design Statement*. In this regard, a high-quality design is proposed that ensures the protection of surrounding residential amenity

through appropriate set-backs with excellent frontage provided onto Milltown Road and Sandford Road.

8.9 Car Parking

The provision of car parking is increasingly being balanced between supporting the mobility needs and preferences of the City's residents and workers, and sustainability, with the Council clearly supporting reduced rates, in accordance with national policy, such as *Compact Settlement Guidelines*.

The *Development Plan* emphasises the need for continued and greater modal shift away from private car use to more sustainable active and public transport modes. This is also being actioned by low car parking standards, with Policy SMT27 (Car Parking in Residential and Mixed Use Developments) as once such example of Council action in support of same:

- "(i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.*
- (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.*
- (iii) To safeguard the residential parking component in mixed-use developments."*

Appendix 5 of the *Development Plan* sets a series of maxima standards for uses in Parking Zone 2, which have been extracted below:

Use	1 No. Space Per	Proposed	Max. Spaces
Residential	Dwelling	562 No. Dwellings	562
Creche	1 space per 100 sq m	380 sq m	4
Community	1 per 275 sq m	1,946 sq m	8
Café/Restaurant	1 per 150 sq m seating area	179 sq m	2

Whilst these standards are clearly stated as being "maximum" in the *Development Plan*, it also states that "a relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location", subject to meeting several criteria. These criteria (Appendix 5 of the *Development Plan*) have been summarised and responded to below:

Criteria	Compliance
Locational suitability and advantages of the site.	<ul style="list-style-type: none"> The site is within 1km/ a c. 13 minute walk of the Beechwood Luas Stop. Proximate to quality bus routes and cycle infrastructure. Brownfield, prime redevelopment site.
Proximity to High Frequency Public Transport services (10 minutes' walk).	<ul style="list-style-type: none"> The site is within a c. 10 minute walk of various bus routes and a c. 13 minute/1km walk to Beechwood Luas stop.
Walking and cycling accessibility/permeability	<ul style="list-style-type: none"> Ample bicycle parking is proposed as part of the development.

<p>and any improvement to same.</p>	<ul style="list-style-type: none"> • The improvement to the permeability and legibility for the area, especially at the junction of Sandford Road and Milltown Road, is a significant advantage for the local community. Extensive open spaces and legible routes through the site will be provided which will improve walking and cycling accessibility/permeability for the area.
<p>The range of services and sources of employment available within walking distance of the development.</p>	<ul style="list-style-type: none"> • The site is within walking distance to many employers in Ballsbridge, Ranelagh and Donnybrook etc. and is also within walking distance to various hospitals such as Clonskeagh Hospital and the Royal Hospital Donnybrook. University College Dublin is also located within walking distance of the lands. • The site is also well served by the Green Line Luas, which provides easy access to a significant quantum of employment locations throughout Dublin. • The site will also provide community/cultural spaces, a café/restaurant and a creche, which will benefit the local community.
<p>Availability of shared mobility.</p>	<ul style="list-style-type: none"> • Some 10 No. car share spaces are proposed as part of the development.
<p>Impact on the amenities of surrounding properties or areas including overspill parking.</p>	<ul style="list-style-type: none"> • The proposed quantity of residential car parking is deemed to be sufficient to meet the needs of future residents and their visitors, and the creche and community/cultural spaces. • Ample cycle parking will support this as an alternative mode. • Car sharing will enhance the efficiency of the car parking provision, improving the 'effective car parking ratio'.
<p>Impact on traffic safety including obstruction of other road users.</p>	<ul style="list-style-type: none"> • Car parking is proposed in safe and accessible locations and this is emphasised in the submitted Road Safety Audit as no problem areas were raised in this regard. A <i>Traffic & Transportation Assessment</i> has also been prepared by DBFL Consulting Engineers.
<p>Robustness of Mobility Management Plan to support the development.</p>	<ul style="list-style-type: none"> • A robust <i>Mobility Management Plan</i> has been prepared by DBFL Consulting Engineers

Informed by the foregoing policy basis in support of low levels of car parking provision, the development includes some 319 No. car parking spaces. By providing a reduced level of car parking provision, the subject scheme seeks to encourage future residents to either walk or cycle and all or the amenities contained therein or avail of the public transport in close proximity to the subject site. Therefore, the reduced provision of car parking for the subject scheme will contribute to consolidated growth and the reduction in carbon emissions by discouraging car ownership.

8.10 Compliance with Relevant Policies, Objectives and Standards of the *Development Plan*

Policy / Objective / Section	Policy / Objective / Requirement	Application Response
Chapter 3 – Climate Action		
CA6	<p>Retrofitting and Reuse of Existing Buildings</p> <p>To promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction, where possible. See Section 15.7.1 Re-use of Existing Buildings in Chapter 15 Development Standards.</p>	<p>Tabor House and the Chapel will be refurbished and reused within the development to provide community/cultural space. As set out in the Existing Buildings Feasibility by OMP and Examination of Alternatives Chapter of the EIAR (Chapter 4), the reuse of the other existing buildings was also considered. However, it was concluded that this would not be possible due to the significant modifications required, the confused circulation of the buildings and the low floor-to-ceiling heights etc.</p> <p>The reuse and refurbishment of Tabor House and the Chapel will allow a new setting to be created in the landscape and the buildings will act as a focal point for the development especially entering the principal entrance from Milltown Road or walking through the pedestrian street from the northern end with glimpses of Tabor House shown through the setback of Block B.</p>
CA7	<p>Energy Efficiency in Existing Buildings</p> <p>To support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro-fitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Dublin Council housing stock to a B2 Building Energy Rating (BER) in line with the government’s Housing for All Plan retrofit targets for 2030.</p>	<p>Tabor House and the Chapel will be reused as part of the development to provide community/cultural uses. The heating and ventilation for these buildings will be improved as necessary to meet the relevant building regulation standards.</p>
CA8	<p>Climate Mitigation Actions in the Built Environment</p> <p>To require low carbon development in the city which will seek to reduce carbon dioxide emissions and which will</p>	<p>An <i>Energy & Sustainability Report</i> prepared by OCSC is enclosed separately which comprehensively considered these items. In relation to part (a), the scheme will be appropriately ventilated and as</p>

	<p>meet the highest feasible environmental standards during construction and occupation, see Section 15.7.1 when dealing with development proposals. New development should generally demonstrate/ provide for:</p> <ul style="list-style-type: none"> a. building layout and design which maximises daylight, natural ventilation, active transport and public transport use; b. sustainable building/services/site design to maximise energy efficiency; c. sensitive energy efficiency improvements to existing buildings; d. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments; e. on-site renewable energy infrastructure and renewable energy; f. minimising the generation of site and construction waste and maximising reuse or recycling; g. the use of construction materials that have low to zero embodied energy and CO₂ emissions; and h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible. 	<p>demonstrated in the <i>Daylight and Sunlight Assessment Report</i>, the proposed development will receive quality daylight. The site is located proximate to active and public transport modes.</p>
CA9	<p>Climate Adaptation Actions in the Built Environment Development proposals must demonstrate sustainable, climate adaptation, circular design principles for new buildings / services / site. The council will promote and support development which is resilient to climate change. This would include:</p> <ul style="list-style-type: none"> a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect; 	<p>The scheme includes green roofs, SuDS measures and opportunities for biodiversity and green infrastructure enhancement and thus has demonstrated that the scheme will be a sustainable climate friendly development.</p> <p>DBFL Consulting Engineers have prepared a <i>Site Specific Flood Risk Assessment</i> which concludes that the proposed residential development is appropriate for the site's flood zone category, the</p>

	<p>b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;</p> <p>c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);</p> <p>d. reducing flood risk, damage to property from extreme events– residential, public and commercial;</p> <p>e. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;</p> <p>f. promoting, developing and protecting biodiversity, novel urban ecosystems and green infrastructure.</p>	<p>proposed development is considered to have the required level of flood protection up to and including the 100 year return event and that overland flow paths have been identified for pluvial flooding exceeding the capacity of the proposed surface water drainage network.</p>
CA10	<p>Climate Action Energy Statements</p> <p>All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.</p>	<p>An <i>Energy & Sustainability Report</i> prepared by OCSC is enclosed separately. Heating and low carbon solutions are detailed as part of the proposed strategy for development.</p>
CA15	<p>Waste Heat, District Heating and Decentralised Energy</p> <p>To actively encourage the development of low carbon and highly efficient district heating and decentralised energy systems across the city utilising low carbon heat sources such as renewable energy and waste heat recovery and to promote the connection of new developments to district heating networks where such systems exist/can be developed in a given area.</p>	<p>An <i>Energy & Sustainability Report</i> prepared by OCSC is enclosed separately. Due to local constraints, district heating was not considered a viable option.</p>

<p>CA17</p>	<p>Supporting the Potential of District Heating in Dublin City To support, encourage and facilitate the potential of district heating in Dublin City, all Climate Action Energy Statements submitted to the Council (see Policy CA10) shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources. In addition:</p> <ul style="list-style-type: none"> • Climate Action Energy Statements for significant new residential and commercial developments in Strategic Development and Regeneration Areas (SDRAs), will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to an available or developing district heating network in the area. • Climate Action Energy Statements for significant new residential and commercial developments in the Docklands SDRA will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to the Dublin District Heating System. 	<p>As advised by OCSC, due to the location of the development, further evaluation of the Dublin District Heating System was not considered as connection would not be feasible.</p>
<p>CA24</p>	<p>Waste Management Plans for Construction and Demolition Projects To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.</p>	<p>This project has been designed in line with best practice principles.</p>

CA25	<p>Electric Vehicles</p> <p>To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation.</p>	<p>Some 50% of the car parking spaces are provided with EV charging facilities and all other spaces are future proofed to provide EV charging should demand arise.</p>
CA29	<p>Climate Action and Green Infrastructure</p> <p>To protect, connect and expand the city's Green Infrastructure while optimising the climate change adaptation and mitigation services it provides.</p>	<p>The scheme will contribute to the green infrastructure of the city by providing open spaces, green roofs and landscaping.</p>
<p>Chapter 4 – Shape and Structure of the City</p>		
SC2	<p>City's Character</p> <p>To develop the city's character by:</p> <ul style="list-style-type: none"> • cherishing and enhancing Dublin's renowned streets, civic spaces and squares; • developing a sustainable network of safe, clean, attractive streets, pedestrian routes and large pedestrian zones lanes and cycleways in order to make the city more coherent and navigable and creating further new streets as part of the public realm when the opportunities arise; • protecting the grain, scale and vitality of city streets and encouraging the development of appropriate and sustainable building heights to ensure efficient use of resources, services and public transport infrastructure and that protects the heritage and natural assets of the city; 	<p>The City's character is cherished, developed, and protected with this proposal. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p> <p>The scheme's design principles are based on creation of interconnected spaces to link in with the existing communities of Milltown Road and Sandford Road, providing a new pedestrian and cycle link along the green boulevard from Sandford Road to the north and joining to Milltown Road to the east of the site. In addition to this the mature woodland to the east of the site is being optimised within the design as a new neighbourhood parkland, again bringing new connectivity off the busy Milltown Road, which currently has a narrow pathway against a hard stone wall on the road edge.</p>

	<ul style="list-style-type: none"> • revitalising the north and south Georgian squares and their environs and realising their residential potential; • upgrading Dame Street/College Green as part of the grand civic spine; • promoting the development of Moore Street and the Parnell Quarter as major new cultural and historical attractions for the city. 	
SC3	<p>Mixed Use Development</p> <p>To promote a mixed-use land use policy in the city centre, including the provision of high quality, sustainable residential development, and facilitating the conversion of both old office buildings and over shop spaces to residential.</p>	<p>The subject proposal will deliver a high-quality mixed-use development comprising 562 No. residential units, a café/restaurant, cultural/community space, and a crèche. In addition to the new buildings proposed on site, Tabor House and the Chapel will be retained and refurbished to provide cultural/community space.</p>
SC4	<p>Recreational and Cultural Events</p> <p>To promote and support a variety of recreational and cultural events in the city's civic spaces; as well as the development of new and the retention and enhancement of existing civic and cultural spaces.</p>	<p>Please see the <i>Masterplan & Architectural Design Statement</i> for details. The scheme provides a minimum of 5% cultural/community space. The final layout of the cultural/community spaces will ultimately be agreed through compliance with Dublin City Council, as identifying occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process.</p> <p>In addition, tenant amenity space and facilities such as a gym, co-working and management suite is provided.</p>
SC5	<p>Urban Design and Architectural Principles</p> <p>To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.</p>	<p>Please see the masterplanning / height strategy within the Masterplan & Architectural Design Statement for details.</p>

SC8	<p>Development of the Inner Suburbs</p> <p>To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport services and enhanced walking and cycling infrastructure.</p>	<p>The sites land-Use Zoning Objective is Z12: To ensure existing environmental amenities are protected in the predominantly residential future use of these lands. In this regard, the scheme maximises the opportunity to densify this infill, brownfield, underutilised land in proximity to public transport and walking and cycling infrastructure, while also maintaining 25% open space and retaining the mature woodland edge to the north and east of the site.</p>
SC10	<p>Urban Density</p> <p>To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.</p>	<p>The proposed development represents an appropriate density for the area. Please see the <i>Masterplan & Architectural Design Statement</i> for details. As noted throughout this Report, the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)</i> (2009) has been superseded by the <i>Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities</i> (2024). Section 6.8 of this Report demonstrates that the proposed development accords with the policies, objectives and SPPRs of the Guidelines.</p>
SC11	<p>Compact Growth</p> <p>In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:</p> <ul style="list-style-type: none"> • enhance the urban form and spatial structure of the city; • be appropriate to their context and respect the established character of the area; • include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents; 	<p>The proposed development is compact and of sustainable density on an underutilised site. The site is close to public transport links of Luas and bus, social and community infrastructure and the development provides services for the surrounding community. Please see the masterplanning / height strategy within the <i>Masterplan & Architectural Design Statement</i> for details.</p>

	<ul style="list-style-type: none"> • be supported by a full range of social and community infrastructure such as schools, shops and recreational areas; • and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. 	
SC12	<p>Housing Mix To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.</p>	The proposed development comprises a mix of studio, one bed, two bed (3-person), two bed (4-person) and three bed units. There is a provision of 10% Part V units. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
SC13	<p>Green Infrastructure To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.</p>	There is high quality soft landscaping and green roofs proposed for the development. A new public woodland park is created along the eastern edge and new green boulevard pedestrian link between Milltown Road and Sandford Road is introduced to enhance permeability for the area. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
SC14	<p>Building Height Strategy To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4.</p>	There is a building height strategy for the buildings and massing to integrate with the existing and proposed context and urban form. Please see the <i>Masterplan & Architectural Design Statement</i> for details. Section 4 of this Report also provides a full response to the relevant SPPRs of the <i>Urban Development and Building Height Guidelines for Planning Authorities (2018)</i> .
SC15	<p>Building Height Uses To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.</p>	There is a mix of uses including residential, a creche, café/restaurant and cultural/ community space proposed for the site. Please see the <i>Masterplan & Architectural Design Statement</i> for details.

<p>SC16</p>	<p>Building Height Locations To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.</p>	<p>The proposed height of the building is stepped and is a maximum of eight storeys (in 2 No. locations – Block A1 & A2). The height is strategically formed to assimilate within the surrounding context and maximise the appropriate density. For example, Block A1 anchors the Plaza at the end of the green boulevard while Block A2 acts as a focal point along Milltown Road. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>
<p>SC17</p>	<p>Building Height To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:</p> <ul style="list-style-type: none"> • follow a design led approach; • include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3); • make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context; • deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; • Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and • have regard to the performance-based criteria set out in Appendix 3. <p>All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the</p>	<p>The proposed heights are modulated throughout the site varying from 2 No. to 8 No. storeys (with ancillary single storey structures). The highest elements of the scheme are located at the least sensitive locations away from neighbouring residential properties and the lower elements positioned adjacent to these properties. A masterplan and urban design rationale has been included for the site and also to show how proposed massing was derived and works with the existing surrounding context. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>

	historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.	
SC19	<p>High Quality Architecture</p> <p>To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.</p>	The proposed development positively contributes to the city's built environment with high quality architecture. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
SC20	<p>Urban Design</p> <p>Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019).</p>	Although the Urban Design Manual – A Best Practice Guide has been superseded by the <i>Compact Settlement Guidelines</i> , the proposed development has still sought to follow the principles set out in the Urban Design Manual as demonstrated in the <i>Masterplan & Architectural Design Statement</i> which responds to all the criteria. This Report demonstrates that the proposed development accords with the policies, objectives and SPPRs of the <i>Compact Settlement Guidelines</i> . In addition, DBFL Consulting Engineers have prepared a <i>DMURS Design Statement</i> which is enclosed separately.
SC21	<p>Architectural Design</p> <p>To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.</p>	The architectural design is contemporary and is resilient to the impacts of climate change. The <i>Energy & Sustainability Report</i> prepared by OCSC is enclosed separately which notes that a " <i>holistic sustainable approach been adopted by the design team for the proposed Sandford Road development</i> ". Please also see the <i>Masterplan & Architectural Design Statement</i> for details.
SC22	<p>Historical Architectural Character</p> <p>To promote understanding of the city's historical architectural character to facilitate new development</p>	The proposed development respects the historic character of Tabor House and the Chapel, which will be retained and will form the focal point of the scheme. Please see the <i>Masterplan & Architectural Design Statement</i> for details.

	which is in harmony with the city's historical spaces and structures.	
SC23	Design Statements That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.	This application includes a <i>Masterplan & Architectural Design Statement</i> prepared by OMP Architects, which is enclosed separately.
Chapter 5 – Quality Housing and Sustainable Neighbourhoods		
QHSN2	National Guidelines To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2019, the Design Manual for Quality Housing (2022), the Design Manual for Urban Roads and Streets (DMURS) (2019), the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.	The proposed development has regard to the DEHLG Guidelines. See <i>Masterplan & Architectural Design Statement</i> for details. This Report also provides responses to the relevant Policy Documents. In relation to affordable housing, the Applicant intends to meet their Part V obligations by providing 56 No. Part V units on site and in relation to housing options for older person, some 139 No. larger, universally designed dwellings have been included in the proposal.
QHSN5	Community Led Regeneration To ensure that regeneration of estates and communities will be planned with the needs of existing and future residents at the core.	The subject scheme will provide much needed residential units and the creche, café/restaurant, community/cultural space will provide additional services for the surrounding community.

QHSN10	<p>Urban Density</p> <p>To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.</p>	<p>The proposed development is of appropriate density for the area having regard to the underutilised nature of the site in a prime serviced location. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>
QHSN11	<p>15-Minute City</p> <p>To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.</p>	<p>The proposed development embraces the principles of the 15-minute city with a mix of uses, reduced quantum of parking, healthy placemaking and density. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>
QHSN12	<p>Neighbourhood Development</p> <p>To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:</p> <ul style="list-style-type: none"> • build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places; • integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city; 	<p>The proposed development encourages neighbourhood development and enhances the quality of the built environment with a mix of uses. The scheme encourages sustainable and low carbon transport modes and will promote a low traffic neighbourhood. The development compliments materials utilised in the community and will promote sustainable energy efficient materials. The scheme is universally designed and will incorporate a range activities and services for all ages. The scheme has been designed in accordance with the <i>RSES, Compact Settlement Guidelines</i> and <i>DMURS</i>. The development provides public realm improvements, and all public spaces will be passively surveyed, ensuring they are safe and secure for all users. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>

	<ul style="list-style-type: none"> • encourage sustainable and low carbon transport modes through the promotion of alternative modes and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance; • promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model. • promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance; • promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects; • cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion; • provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life; • have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the Regional Spatial and Economic Strategy and national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'; • are designed to promote safety and security and avoid anti-social behaviour. 	
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QHSN14	<p>High Quality Living Environment To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.</p>	<p>The proposed development provides a high-quality living environment by providing new open spaces, a creche, resident amenity space, a café/restaurant and community/cultural spaces, in addition to residential units.</p>
QHSN16	<p>Accessible Built Environment To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.</p>	<p>The proposed development and outdoor spaces are all universally accessible and are in accordance with the 7 No. principles of Universal Design. Please see the <i>Masterplan & Architectural Design Statement</i> for details and the Universal Access Statement prepared by O’Herlihy Access Consulting.</p>
QHSN17	<p>Sustainable Neighbourhoods To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.</p>	<p>The scheme provides a mix of units, a creche, residents’ amenity space, a café/restaurant and community/cultural space, in addition to landscaped open spaces including children’s play. Older people and persons with physical impairments will be able to accessible the open space areas due to their careful design in terms of levels, siting and uses. The dwelling sizes will facilitate young families or older people looking to downsize for example and this will serve the needs of a range of people. Some 139 No. larger, universally designed units are provided to cater for the needs of an ageing population.</p> <p>Therefore, the needs of people in various stages of their lives have been considered in the proposed mixed-use scheme.</p>
QHSN18	<p>Needs of an Ageing Population To support the needs of an ageing population in the community with reference to housing, mobility and the</p>	<p>The proposed dwellings in the development and outdoor spaces are universally accessible. Some 139 No. larger, universally designed units are provided to cater for the needs of an ageing population and having</p>

	<p>public realm having regard to Age Friendly Ireland's 'Age Friendly Principles and Guidelines for the Planning Authority 2020', the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2019.</p>	<p>been designed having regard to the relevant guidelines. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>
QHSN19	<p>Youth Friendly City To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People's Plans prepared by the Dublin City North and Dublin City South Children and Young People's Services Committees and any future DCC Youth Friendly City Strategy including any future youth homeless strategy.</p>	<p>A creche will cater for the daytime care needs of both the development's future residents and those of the established community due to its ample size.</p> <p>Play areas for children have been incorporated into the scheme to encourage physical activity and integration, and the community/cultural space provided can also serve the needs of the young population (depending on final use to be agreed with Dublin City Council post-planning).</p>
QHSN21	<p>Gated Residential Development It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.</p>	<p>The public park and plaza, green boulevard, woodland glade and forecourt are accessible to the public. As with any residential development, the proposed communal amenity spaces will be restricted to residents use only. The development provides a good balance between providing easily accessible public open spaces in addition to some gated communal spaces for resident use.</p>
QHSN22	<p>Adaptable and Flexible Housing To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of</p>	<p>The housing units are adaptable and flexible. In this regard, we note that 139 No. larger, universally designed units are provided. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>

	Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015.	
QHSN25	Housing for People with Disabilities To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which facilitates equality of outcome, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/supported living units, lifetime housing, and adaptation of existing properties.	The proposed housing units in the development and outdoor spaces are universally accessible. Some 139 No. larger, universally designed units are provided. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
QHSN011	Universal Design To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019.	The proposed housing units in the development and outdoor spaces are universally accessible. The scheme provides 278 No. oversized apartment units which represents 50% of the apartment unit provision. Of these 50% oversized units, some 139 No. units are designed to be universal design (25% of the total units provided). Please see the <i>Masterplan & Architectural Design Statement</i> for details.
QHSN34	Social, Affordable Purchase and Cost Rental Housing To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH	The development will provide 56 No. social housing units (10% of the total units), which is in accordance with Part V of the <i>Planning and Development Act 2000</i> (as amended).

	'Social Housing Strategy 2020' and support the realisation of public housing.	
QHSN36	<p>High Quality Apartment Development</p> <p>To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.</p>	The apartments are designed to a high quality with plenty of natural light. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
QHSN37	<p>Houses and Apartments</p> <p>To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.</p>	The proposed housing and apartments are a mix of studio, 1 No. bed, 2 No. bed (three person), 2 No. bed (four person) and 3 No. bed units. There is a provision of 10% Part V units. The unit's range in shapes and sizes. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
QHSN38	<p>Housing and Apartment Mix</p> <p>To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities.</p> <p>Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.</p>	The proposed housing and apartments are a mix of studio, 1 No. bed (two person), 2 No. bed (three person), 2 No. bed (four person) and 3 No. bed units. There is a mix of 10% Part V units. The unit's range in shapes and sizes. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
QHSN39	<p>Management</p> <p>To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit</p>	A <i>Property Management Strategy Report</i> has been prepared by Aramark and is enclosed separately.

	Developments Act 2011 and the Property Services (Regulation) Act 2011.	
QHSN47	High Quality Neighbourhood and Community Facilities To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.	Community/cultural space is proposed as part of the development. The final user and layout of the community/cultural spaces will ultimately be agreed through compliance with Dublin City Council, as identifying occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process.
QHSN48	Community and Social Audit To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.	<i>A Community and Social Infrastructure Audit (incl. Schools and Childcare)</i> has been prepared by Thornton O'Connor Town Planning which assesses the provision of community facilities and infrastructure in the vicinity. The site is well served by community facilities and infrastructure and the provision of designated community/cultural space in line with the <i>Development Plan</i> , will further enhance the available of social infrastructure in the area.
QHSN49	Phasing To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.	A phasing plan is included with the planning application. Please see Chapter 3.0 of the EIAR collated by Thornton O'Connor Town Planning and the <i>Preliminary Construction Management Plan</i> and Surface Water Catchment and Phasing Layout (Drawing No. 190226-05-Zoo-DTM-DR-DBFL-CE-1304) prepared by DBFL Consulting Engineers which indicates the surface water catchments and aligning phasing arrangements.
QHSN50	Inclusive Social and Community Infrastructure To support the development of social and community infrastructure that is inclusive and accessible in its design	The scheme provides a range of uses which are universally accessible.

	and provides for needs of persons with disabilities, older people, migrant communities and children and adults with additional needs including the sensory needs of the neurodiverse.	
QHSNO15	Community Safety Strategy That all housing developments over 100 units shall include a community safety strategy for implementation.	A Community Safety Strategy has been prepared and is enclosed as part of the <i>Masterplan & Architectural Design Statement</i> .
QHSN55	Childcare Facilities To facilitate the provision of appropriately designed and sized fit-for-purpose affordable childcare facilities as an integral part of proposals for new residential and mixed-use developments, subject to an analysis of demographic and geographic need undertaken by the applicant in consultation with the Dublin City Council Childcare Committee, in order to ensure that their provision and location is in keeping with areas of population and employment growth.	A creche is proposed at the ground floor of Block F within the development. The proposed creche has been designed and sized to provide 75 No. childcare spaces to cater for the proposed development and local community. Please see the <i>Masterplan & Architectural Design Statement</i> for details.
QHSN58	Culture in Regeneration To recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development and civic engagement.	Tabor House and the Chapel as well as an external Secret Garden have been designated as cultural/community space. The final use will be agreed with Dublin City Council post-planning. The provision of this space will contribute towards achieving this policy.
QHSN60	Community Facilities To support the development, improvement and provision of a wide range of socially inclusive, multi-functional and diverse community facilities throughout the city where required and to engage with community and corporate stakeholders in the provision of same.	Tabor House and the Chapel as well as an external Secret Garden have been designated as cultural/community space. The final use will be agreed with Dublin City Council post-planning. The provision of this space will contribute towards achieving this policy.

Chapter 6 – City Economy and Enterprise		
CEE1	<p>Dublin’s Role as the National Economic Engine</p> <p>(i) To promote and enhance the role of Dublin as the national economic engine and driver of economic recovery and growth, with the city centre as its core economic generator.</p> <p>(ii) To promote and facilitate Dublin as a creative and innovative city that is globally competitive, internationally linked, attractive and open.</p> <p>(iii) To promote an internationalisation strategy building mutually-beneficial economic and other links with key cities globally to encourage investment and tourism in Dublin.</p>	<p>The proposed development will support the economy by way of its construction activity, but also due to the mix of uses proposed. These will have an economic and employment benefit once operational.</p> <p>In addition, augmenting the stock of housing in the city will meet ongoing shortages which are recognised as being detrimental to the city and State’s economic performance.</p>
CEE12	<p>Transition to a Low Carbon, Climate Resilient City Economy</p> <p>To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.</p>	<p>The development will play a role in supporting this transition due to:</p> <ul style="list-style-type: none"> • Its proximity to public transport options; • Its proximity to the services and amenities; • The proposed mix of uses; • The scheme’s A2/A3 BER target; • Rooftop solar panels; etc.
CEE13	<p>Towards a Green and Circular Economy</p> <p>To support the growth of the ‘green economy’ including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation.</p>	<p>Solar panels are proposed as part of the development, which will generate renewable energy for use.</p> <p>Some 50% of the car parking spaces are EV equipped. Car share spaces (10 No.) are also proposed and will support the circular economy.</p> <p>The <i>Resource Waste Management Plan</i> (Appendix 14.1 of the EIAR) will minimise waste and maximise reuse of materials during the demolition and construction stages.</p>

Chapter 7 – The City Centre, Urban Villages and Retail		
CCUV30	<p>Cafés/Restaurants To promote and facilitate the provision of cafés / restaurants in the city and support their role in making the city more attractive for residents, workers, and visitors and in creating employment.</p>	<p>The proposed development seeks to provide a café/restaurant which measures 179 sq m and is located at the ground floor of Block F. The proposed café/restaurant will provide active street frontage and has been strategically located near the entrance of the site to attract a high level of footfall. The proposed café/restaurant will generate employment opportunities for future residents and the local community.</p>
CCUV37	<p>Plan Active and Healthy Streets To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is to encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.</p>	<p>The proposed development promotes an active street fronts and safe public spaces which will encourage walking and cycling.</p>
CCUV38	<p>High Quality Streets and Spaces To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.</p>	<p>The proposed streets and public space will be plentiful and high-quality and will contribute towards providing a vibrant, attractive, accessible and safe development. The spaces will enhance connectivity and will enliven the subject site at a key junction. All spaces will be universally accessible.</p>
CCUV39	<p>Permeable, Legible and Connected Public Realm To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.</p>	<p>The proposed development creates a permeable and legible public realm that contributes to the key objectives of the <i>Development Plan</i>.</p>

CCUV40	<p>Public Safety To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.</p>	<p>The proposed development creates a safe public realm with passive surveillance.</p>
CCUV44	<p>New Development That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility.</p>	<p>The proposed development will deliver a high-quality and well designed public realm including open space for use by the community. The public realm and green infrastructure will create linkages and connection and will enhance accessibility. Materials used within the scheme will be durable and high-quality.</p>
Chapter 8 – Sustainable Movement and Transport		
SMT1	<p>Modal Shift and Compact Growth To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.</p>	<p>The proposed development complies with the overriding principles particularly in regard to the promotion of active mobility (new infrastructure provision and secure on-site parking opportunities), appropriate density in terms of the site's excellent accessibility levels, in parallel with discouraging private car use by restricting car parking provision as an integral demand management initiative.</p> <p>The car parking provision at a ratio of 0.546 spaces per unit (0.496 spaces per unit excluding car share and mobility impaired spaces) has sought to provide a minimised number of spaces rather than the maximum DCC standard due to the accessible urban nature of the site, with the nearby alternative active and sustainable travel choices highlighted. The <i>Mobility Management Plan</i> outlines the strategies with which modes other than private car use will be promoted within the site. Further ample consideration in the design process has been given to pedestrians and cyclists to provide a permeable site for these active modes in addition to a generous provision of cycle parking.</p>

SMT2	<p>Decarbonising Transport</p> <p>To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.</p>	<p>The proposed development complies with the overriding principles through the provision of 50% of the car parking to be provided with EV charge points on-site.</p>
SMT01	<p>Transition to More Sustainable Travel Modes</p> <p>To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).</p>	<p>Please refer to Table 5.1 in the <i>Mobility Management Plan</i> for details on the predicted modal split targets of the proposed development.</p>
SMT3	<p>Integrated Transport Network</p> <p>To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region.</p>	<p>The internal pedestrian and cyclist network within the site will serve to connect residents, employees and visitors to the routes outside the site boundary – integrating with the existing and proposed transport networks in the area.</p>
SMT4	<p>Integration of Public Transport Services and Development</p> <p>To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.</p>	<p>The proposed development complies in regard to the intensification and mixed-use nature of the scheme proposals in an area and currently benefits from good bus and LUAS accessibility levels with emerging proposals to further enhance the attractiveness of public transport, a <i>Public Transport Capacity Assessment</i> has been compiled and accompanies the planning documentation.</p>
SMT6	<p>Mobility Management and Travel Planning</p> <p>To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting</p>	<p>A <i>Mobility Management Plan</i> has been compiled and accompanies the planning documentation.</p>

	and providing for active travel and public transport use while managing vehicular traffic and servicing activity.	
SMT7	<p>Travel Plans for New and Existing Developments</p> <p>To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.</p>	<p>A <i>Mobility Management Plan</i> has been compiled and accompanies the planning documentation.</p>
SMT8	<p>Public Realm Enhancements</p> <p>To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council’s Public Realm Strategy (‘Your City – Your Space’), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.</p>	<p>The proposed infrastructure enhancements along the site frontage of the subject corner site represents a significant improvement to the public street corridor with landscaping proposals and enhanced boundary treatments complementing the improved pedestrian and cycle routes along Sandford Road and Milltown Road.</p>
SMT9	<p>Public Realm in New Developments</p> <p>To encourage and facilitate the co-ordinated delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.</p>	<p>The proposals include the implementation of a large quantum of public open space which will deliver high quality public realm, and will be easily accessible to pedestrians and cyclists. Further details of the new open spaces are detailed in the landscape architect’s documentation.</p>
SMT11	<p>Pedestrian Network</p> <p>To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.</p>	<p>The infrastructure enhancements along the site frontage represent a significant improvement to the public street corridor with landscaping proposals and enhanced boundary treatments complementing the improved pedestrian and cycle routes along Sandford Road and Milltown Road.</p>

SMT02	<p>Improving the Pedestrian Network To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.</p>	<p>The infrastructure enhancements along the site frontage represent a significant improvement to the public street corridor with the improved pedestrian and cycle routes along Sandford Road and Milltown Road. The design of these infrastructure improvements has noted this policy and incorporated the recommended measures in the appropriate areas. The incorporation of a controlled pedestrian crossing on Milltown Road will further enhance the pedestrian accessibility and permeability along the site area – serving a key desire line for pedestrians.</p>
SMT12	<p>Pedestrians and Public Realm To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.</p>	<p>The infrastructure enhancements along the site frontage that are to be implemented by the applicant represent a significant improvement to the public street corridor with new and improved pedestrian and cycle routes offering a safe and comfortable street environment.</p>
SMT13	<p>Urban Villages and the 15-Minute City To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.</p>	<p>Not directly applicable to the proposed development however the scheme includes permeable connections through the site which will benefit active travel.</p>
SMT14	<p>City Centre Road Space To manage city centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes and the private car, in particular, where there are intersections between DART, Luas and Metrolink and with the existing and proposed bus network.</p>	<p>Not directly applicable to the proposed development however the infrastructure enhancements along the site frontage represent a significant improvement to the public street corridor with landscaping proposals complementing the improved pedestrian and cycle routes along Sandford Road and Milltown Road.</p>
SMT16	<p>Walking, Cycling and Active Travel To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active</p>	<p>As highlighted above, the site layout design has sought to facilitate active travel connections throughout the site through the use of DMURS principles and national best practice to create a permeable environment for active travel users.</p>

	travel for people of all ages and abilities, in line with the city's mode share targets.	
SMT ₁₇	<p>Active Travel Initiatives</p> <p>To promote and help develop community-based coordinated initiatives at local level that encourage active travel and modal switch to sustainable transport modes, and to target underrepresented cohorts/groups in such initiatives.</p>	Initiative and targets set within the <i>Mobility Management Plan</i> aim to promote a modal shift for the site residents and employees.
SMT ₁₈	<p>The Pedestrian Environment</p> <p>To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.</p>	As mentioned, the pedestrian accessibility throughout the subject site will facilitate a number of direct connections for pedestrians wherever their origin within the site may be, and public realm improvements will benefit the public travelling externally to the site.
SMT _{O8}	<p>Cycling Infrastructure and Routes</p> <p>To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objective GI02.</p>	Whilst not directly applicable to the site, site accesses have been designed with consideration to cyclists to integrate with the existing and proposed cyclist routes along the scheme boundaries.
SMT _{O10}	<p>Walking and Cycling Audits</p> <p>Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of</p>	A Quality Audit has been undertaken and accompanies the proposed development. In accordance with DMURS, this Quality Audit includes a Walking and Cycling Audit of the environs of the development.

	the walking and cycling facilities in the environs of a development is undertaken.	
SMT012	<p>Cycle Parking Spaces</p> <p>To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.</p>	A number of short-term visitor cycle parking spaces, including cargo bicycle spaces, will be available at surface level for visitors to any of the land uses within the subject site. The <i>Traffic and Transport Assessment</i> and <i>Bicycle Design Statement</i> further outlines the proportion, specification and location of these spaces.
SMT014	<p>Cycle Parking Facilities</p> <p>To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density cycle parking facilities, as well as parking for cargo and adapted bicycles at appropriate locations, taking into consideration the NTA's GDA Cycle Network Plan, and Dublin City Council's Public Realm Strategy.</p>	Not directly applicable to the proposed development however proposals include the provision of high quality short- and long-term bicycle parking in accordance with the appropriate development management standards. Cycle parking spaces are available at surface level within the public realm, within surface level bicycle shelters and within basement level bicycle shelters for long-term uses. The <i>Traffic and Transportation Assessment</i> outlines the various locations and provision of all the cycle parking and cyclist facilities at the subject site.
SMT20	<p>Walking and Cycling for School Trips</p> <p>(a) To prioritise and target a significant increase in the number of children walking and cycling to and from schools;</p> <p>(b) To promote walking and cycling for school trips to all educational facilities;</p> <p>(c) To promote and support initiatives such as "Safe Routes to School", the 'Green Schools' and 'Schools Streets' projects, and to prioritise school routes for permeability projects and provision and enhancements of pedestrian and cycle ways.</p>	Whilst not directly applicable to the subject site, the targets set out within the <i>Mobility Management Plan</i> to promote active travel are in accordance with this objective.

SMT26	<p>Commuter, Shopping, Business and Leisure Parking To discourage commuter parking and to ensure adequate but not excessive parking provision for short-term shopping, business and leisure uses.</p>	<p>Parking has been provided below the maximum car parking standards with initiatives to encourage the use of active and sustainable modes at the site outlined within the <i>Mobility Management Plan</i>.</p>
SMT27	<p>Car Parking in Residential and Mixed Use Developments (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking. (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. (iii) To safeguard the residential parking component in mixed-use developments.</p>	<p>The proposals comply with this policy with a car parking ratio of 0.546 spaces per unit (0.496 spaces per unit excluding car share and mobility impaired spaces). The <i>Parking Strategy</i> details the measures which shall be in place to ensure the effective and proper use of the vehicle spaces on site. Some 10 No. car share vehicles will make up part of the car parking provision, 5 No. of these will be GoCar vehicles and the remainder will be a development car club. These spaces will reduce the need for residents to own a private car.</p>
SMT29	<p>Expansion of the EV Charging Network To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.</p>	<p>It is noted that 50% of all on-site car parking spaces will benefit from being fitted with EV charge points as per DCC development management standards.</p>
SMT33	<p>Design Manual for Urban Roads and Streets To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.</p>	<p>DBFL Consulting Engineers have confirmed that the design of the proposed development will comply fully with the guidance detailed in DMURS. A <i>DMURS Design Statement</i> has been prepared outlining the scheme's compliance.</p>

SMT34	<p>Street and Road Design</p> <p>To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.</p>	<p>The subject scheme including pedestrian and cyclist infrastructure, and the internal street network will accord with this policy. The development prioritises active travel and public transport.</p>
SMT036	<p>Environmental and Road Safety Impacts of Traffic in the City</p> <p>To tackle the adverse environmental and road safety impacts of traffic in the city through measures such as:</p> <ul style="list-style-type: none"> • The implementation of traffic calming measures and filtered permeability including the restriction of rat-runs in appropriate areas in accordance with best practice and following advice contained in the Design Manual for Urban Roads and Streets (DMURS). • To undertake a study, assessing and identifying areas adjacent to proposed sustainable transport projects for traffic calming and filter permeability. • The ongoing monitoring of traffic noise and emissions, and the assessment and evaluation of the air quality and traffic noise impacts of transport policy and traffic management measures being implemented by Dublin City Council. • To support programmes of action which tackle the issue of road safety in the city. • To promote traffic calming in existing residential neighbourhoods through innovative street design and layout such as homezones, filtered permeability, low traffic neighbourhoods , 	<p>Whilst not directly applicable to the proposed development it is noted that a Quality Audit, incorporating a Stage 1 Road Safety Audit, has been undertaken in relation to the proposed development to ensure that all road safety implications are fully addressed at planning design stage. This ensures that a safe street environment is being implemented / delivered by the proposed developments design.</p>

	quietways and unsignalised crossings where appropriate.	
Chapter 9 – Sustainable Environmental Infrastructure and Flood Risk		
Sl2	<p>Integrating Water Services with Development To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.</p>	<p>Uisce Eireann Confirmation of Feasibility and Statement of Design Acceptance received. Please refer to Appendix D of the <i>Infrastructure Design Report</i> by DBFL Consulting Engineers.</p>
Sl3	<p>Separation of Foul and Surface Water Drainage Systems To require all new development to provide separate foul and surface water drainage systems.</p>	<p>The proposed development has separate foul and surface water drainage systems.</p>
Sl4	<p>Drainage Infrastructure Design Standards To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).</p>	<p>The proposed development's sewers are designed to comply with the Greater Dublin Regional Code of Practice for Drainage Works and/ or Uisce Eireann's Code of Practice and Standard Details – refer to DBFL's <i>Infrastructure Design Report</i> and Site Services drawing (ref. no. 190226-05-Zoo-DTM-DR-DBFL-CE-1301).</p>
Sl6	<p>Water Conservation To require all developments to incorporate best practice water conservation and demand management measures in order to promote water conservation by all water users, and minimise the pressure for water drawdown, wastage of water supply and reduced availability of water resources.</p>	<p>The scheme will incorporate best practice water conservation and demand management measures.</p>
Sl13	<p>Minimising Flood Risk To minimise the flood risk in Dublin City from all other sources of flooding as far as is practicable, including fluvial,</p>	<p>DBFL Consulting Engineers have prepared a <i>Site Specific Flood Risk Assessment</i> which concludes that the proposed residential development is appropriate for the site's flood zone category, the proposed development is considered to have the required level of flood</p>

	coastal, reservoirs and dams, the piped water system, and potential climate change impacts.	protection up to and including the 100 year return event and that overland flow paths have been identified for pluvial flooding exceeding the capacity of the proposed surface water drainage network.
Sl14	<p>Strategic Flood Risk Assessment</p> <p>To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Justification Tests, and to have regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.</p>	The proposed development considers the Strategic Flood Risk Assessment prepared as part of the <i>Dublin City Development Plan 2022-2028</i> and has been referenced in the <i>Site-Specific Flood Risk Assessment</i> by DBFL Consulting Engineers.
Sl15	<p>Site-Specific Flood Risk Assessment</p> <p>All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> • The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 and any future amendments, and the Strategic Flood Risk Assessment (SFRA) as prepared by this development plan. • The application of the sequential approach, with avoidance of highly and less vulnerable development in areas at risk of flooding as a priority and/ or the provision of water compatible development only. Where the Justification Test for 	DBFL have prepared a Site-Specific Flood Risk Assessment for inclusion with this LRD application. Refer to report no. 190226-X-X-X-XXX-RP-DBFL-CE-0003.

	<p>Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change and those associated with existing flood defences. The SSFRA will include site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. Allowances for climate change shall be included in the SSFRA.</p> <ul style="list-style-type: none"> • On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at significant risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009) on the portion at significant risk of flooding. There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding which do not have existing development on them. 	
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<p>Sl18</p>	<p>Protection of Flood Alleviation Infrastructure To put in place adequate measures to protect the integrity of flood alleviation infrastructure in Dublin City and to ensure new developments or temporary removal of any flood alleviation asset does not increase flood risk, while ensuring that new flood alleviation infrastructure has due regard to nature conservation, natural assets, open space and amenity values, as well as potential climate change impacts.</p>	<p>The <i>Site-Specific Flood Risk Assessment</i> prepared by DBFL Consulting Engineers concludes the following:</p> <p><i>"The Site-Specific Flood Risk Assessment for proposed development at Sandford Road has been undertaken in accordance with the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and its Technical Appendices.</i></p> <p><i>Following the Flood Risk Assessment, it has been determined that the site is located in Flood Zone C as defined by the Guidelines.</i></p> <p><i>It is concluded that the;</i></p> <ul style="list-style-type: none"> <i>• Proposed residential development is appropriate for the site's flood zone category.</i> <i>• The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the 'Avoid' principal has been achieved.</i> <p><i>In conclusion the proposed development is considered to have the required level of flood protection up to and including the 100 year return event.</i></p> <p><i>Overland flow paths have been identified for pluvial flooding exceeding the capacity of the proposed surface water drainage network."</i></p>
<p>Sl20</p>	<p>Basement Flood Risk Management That there is a general presumption against the development of basements for residential use below the estimated flood levels for Flood Zones A or B (see Section 15.18.4 and Appendix 9 for further guidance).</p>	<p>The development includes a basement; however, we note that the site is located in Flood Zone C. A Basement Impact Assessment is enclosed with the planning application.</p>

<p>Sl21</p>	<p>Managing Surface Water Flood Risk To minimise flood risk arising from pluvial (surface water) flooding in the City by promoting the use of natural or nature-based flood risk management measures as a priority, by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits, and climate adaption.</p>	<p>SuDS drainage systems have been incorporated into the Development. Please refer to DBFL Consulting Engineers <i>Infrastructure Design Report</i> and relevant drawings. Proposed SUDS methodologies include green/blue roof, permeable paving, bio-retention areas, soakaway pits, tree pits, and attenuation ponds.</p>
<p>Sl22</p>	<p>Sustainable Drainage Systems To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design & Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.</p>	<p>SuDS drainage systems have been incorporated into the Development. Please refer to DBFL Consulting Engineers <i>Infrastructure Design Report</i> and relevant drawings. Proposed SUDS methodologies include green roof, blue roof, permeable paving, bio-retention areas, soakaway pits, tree pits, and attenuation basins.</p>
<p>Sl23</p>	<p>Green Blue Roofs To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed</p>	<p>Green and blue roofs are provided for the development. Please refer to DBFL Consulting Engineers <i>Infrastructure Design Report</i> (Section 3.2.5)</p>

	in accordance with the requirements of Dublin City Council's Green & Blue Roof Guide (2021) which is summarised in Appendix 11.	and relevant drawings. Green / Blue Roof provision exceeds DCC's minimum coverage of 70%.
Sl24	<p>Control of Paving of Private Driveways / Vehicular Entrances / Grassed Areas</p> <p>To require that all surface water run-off from new/ extended domestic driveways, repaired/ replacement driveways, and vehicular entrances (where such development is not exempted from the requirement to obtain planning permission), is managed through the use of SuDS, ensuring no increase in surface water discharges to the public drainage network (for further guidance, please refer to Appendices 5 and 12).</p>	The proposed SUDS strategy includes provision of permeable paving for in-curtilage parking spaces at courtyard houses. A 10% urban creep was applied to these areas.
Sl25	<p>Surface Water Management</p> <p>To require the preparation of a Surface Water Management Plan as part of all new developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance.</p>	Refer to DBFL's <i>Infrastructure Design Report</i> (Section 3, Surface Water Drainage) which details surface water management proposals.
Sl26	<p>Taking in Charge of Private Drainage Infrastructure</p> <p>To require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be to designed to taking in charge standards).</p>	Private drainage (within the site) and public drainage (surface water outfall) are designed / detailed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works. Refer to DBFL Engineering Drawings and Reports.

<p>Sl27</p>	<p>Sustainable Waste Management To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. To support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).</p>	<p>The various waste reports prepared by AWN Consulting (included as part of the EIAR) have been prepared with due consideration of best practice standards.</p>
<p>Sl28</p>	<p>Sustainable Waste Management To prevent and minimise waste generation and disposal, and to prioritise prevention, recycling, preparation for reuse and recovery in order to develop Dublin as a circular city and safeguard against environmental pollution.</p>	<p>The various waste reports prepared by AWN Consulting have been prepared with due consideration of best practice standards. For example, the Operational Waste Management Plan (Appendix 14.2 of the EIAR) notes:</p> <p><i>"This OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources)."</i></p>
<p>Sl29</p>	<p>Segregated Storage and Collection of Waste Streams To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance, see Appendix 7).</p>	<p>The site layout provides designated bin storage areas located at basement and ground level. The bins from the development will be brought to a collection point in the forecourt, or directly from the ground level Waste Storage Areas by the waste contractor or facilities management, immediately prior to collection. The basement level carpark is insufficient in height for a waste truck to access, all waste will be collected at grade. Temporary storage at the bottom of the basement ramp has been provided to move bins prior to collection. Residents will be required to take their segregated waste materials to their designated Waste Storage Areas and deposit their segregated</p>

		waste into the appropriate bins. The commercial tenants will be required to take their segregated waste materials to their designated commercial WSAs and deposit their segregated waste into the appropriate waste receptacles. Collections of these items will be arranged as required by the tenant or facilities management depending on the agreement.
Sl30	<p>Waste Management in Apartment Schemes</p> <p>To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or and any future updated versions of these guidelines produced during the lifetime of this plan).</p>	The various waste reports prepared by AWN Consulting have been prepared with due consideration of best practice standards and all relevant guidance documents, including the <i>Planning Design Standards for Apartments Guidelines for Planning Authorities 2025</i> .
SIO16	<p>Eastern-Midlands Region Waste Management Plan</p> <p>To support the implementation of the Eastern Midlands Regional Waste Management Plan 2015–2021 and any subsequent plans in order to facilitate the transition from a waste management economy towards a circular economy.</p>	The <i>Operational Waste Management Plan</i> prepared by AWN Consulting (Appendix 14.2 of the EIAR) has been prepared in accordance with current legal and industry standards including <i>The National Waste Management Plan for a Circular Economy 2024 - 2030 (2024)</i> , which replace the Eastern Midlands Regional Waste Management Plan 2015–2021.
Sl37	<p>Noise Sensitive Development</p> <p>To give careful consideration to the location, design and construction of noise-sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources, where practical, and to minimise the potential for noise disturbance.</p>	A Noise and Vibration Chapter has been prepared by AWN Consulting as part of the EIAR (Chapter 13). This chapter demonstrates that the scheme has been comprehensively considered from a noise perspective having regard to the mitigation measures that are proposed for certain façades in the scheme such as acoustic glazing and ventilation in addition to sound insulation in areas comprising entertainment noise.

Sl38	<p>Noise Sensitive Development</p> <p>To ensure that new residential development close to approved commercial uses is suitably sound insulated (for further guidance, see Sections 15.14 and 15.18.9).</p>	<p>Sound insulation will be provided within the development where required.</p>
Sl41	<p>Lighting Standards</p> <p>To provide and maintain high quality and appropriate street/ outdoor lighting on public roads, footways, cycleways, public realm throughout the City in accordance with the Council's Vision Statement for Public Lighting in Dublin City and related public lighting projects. In general, the lighting of roads and public amenity areas shall be provided in accordance with the requirements of the latest Public Lighting Standards IS EN13201 and further updates.</p>	<p>The scheme has been designed in accordance with the relevant guidance.</p>
Sl42	<p>Light Pollution</p> <p>To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.</p>	<p>The scheme has been designed with ecological considerations integral to the process. Lighting has been designed and selected to ensure light spillage has been minimised.</p> <p>The site has different levels of zoning, including having a dark zone for bats. The <i>Lighting Report</i> prepared by Pritchard Themis illustrates zoning and outlines the specification requirements of lighting equipment to minimise light spill.</p>
Sl43	<p>Energy Efficient Lighting</p> <p>To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.</p>	<p>All public and external areas will be appropriately and safely lit and the lighting specification has been selected for an energy efficient development. Final lighting specification and control should be selected to maintain an energy efficient approach.</p>

SI46	<p>Open Access / Operator Neutral Host Connectivity</p> <p>To require all new developments to provide open access connectivity arrangements directly to the individual premises to enable service provider competition and consumer choice.</p>	<p>The development will provide for open access connectivity arrangements directly to individual premises which will enable service provider competition and consumer choice in line with Policy SI46.</p>
SI48	<p>Sharing and Co-Location of Digital Connectivity Infrastructure</p> <p>To support the appropriate use of existing assets such as lighting, traffic poles and street furniture for the deployment of telecoms equipment and to encourage the sharing and co-location of digital connectivity infrastructure (including small cells, access points, communications masts and antennae) in order to avoid spatially uncoordinated and duplicitous provision that makes inefficient use of city space and negatively impacts on visual amenity and built heritage.</p>	<p>The Applicant notes this and will take it into account should it need to seek planning permission in the future for telecommunication antennae and support structures.</p>
SI50	<p>Undergrounding of Energy Utility Infrastructure</p> <p>To require that the location of local energy services such as electricity, telephone and television cables be underground wherever possible, and to promote the undergrounding of existing overhead cable and associated equipment, where appropriate, in the interests of visual amenity and facilitating compact urban development.</p>	<p>All services will be underground.</p>
<p>Chapter 10 – Green Infrastructure and Recreation</p>		
GI1	<p>Green Infrastructure Assets</p> <p>To identify and protect the integrity of the city’s GI assets, as appropriate, and to enhance and expand the connectivity, multi-functionality, and accessibility of the city’s green infrastructure network, while addressing gaps in the network.</p>	<p>The site will form part of, and support, the Green Infrastructure Network throughout this part of the city. In addition, the development will facilitate connections for the public through the site towards the Dodder Greenway route which will positively contribute to, and create linkages with, the surrounding strategic green network. The site will contribute to the green infrastructure network in this part of the city and</p>

		will provide public access to open space on a site that is currently closed from public enjoyment. The proposed development will support the green infrastructure of the city, by retaining much of the existing woodland habitat at the site and providing a development which includes open spaces and green roofs.
GI2	<p>Connectivity</p> <p>To develop an interconnected green infrastructure network of strategic natural and semi-natural areas with other environmental features including green spaces, rivers, canals, the coastal and marine area and other physical features including streets and civic spaces that supports ecological, wildlife, and social connectivity.</p>	The proposed development will contribute to providing an interconnected green infrastructure network in the city by retaining much of the existing woodland habitat at the site and providing a development which includes open spaces and green roofs.
GI3	<p>Multi-functionality (GI)</p> <p>To ensure delivery of multifunctional green and civic spaces that meet community needs, support biodiversity, promote active and passive recreation, flood and surface water management and local habitat improvements. The multi-functionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.</p>	The proposed landscape setting aims to provide substantial benefit to the urban drainage due to the large permeable areas that will be provided on site. The biodiversity of the area would increase due to a large number of retained existing trees and new trees generation provided. The woodland will be retained and enhanced by planting of native shrubs in the groundcover. Furthermore, the variety of outdoor recreation areas will offer a great opportunity to the future residents and the public to use the zone immersed in a lush green area. The open spaces and pedestrian/cyclist links will contribute towards the green infrastructure network of the city and will include sustainable urban drainage systems and will promote sustainable modes of transport. The proposed development will provide areas managed for biodiversity e.g., pollinators, birds and bats.
GI4	<p>Accessibility</p> <p>To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Parks Strategy, access to facilities and to public parks and open</p>	The public space concept is based on a principle that promotes social engagement, sustainability, site connectivity & permeability and a healthy lifestyle for the future residents and the public and various pedestrian and cycle links are provided through the site. The scheme

	<p>spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed.</p>	<p>will consolidate the neighbourhood and increase legibility for the wider community and spaces are universally accessible.</p> <p>Please also refer to the accompanying <i>Universal Access Statement</i> prepared by O’Herlihy Access Consultancy, which notes that “<i>various accessible landscaped areas are provided throughout the site will be designed to meet the guidance in Section 1.1 of TGD M 2022</i>”.</p>
<p>G15</p>	<p>Greening of Public Realm / Streets To integrate urban greening features including nature based solutions into the existing public realm where feasible and into the design of public realm projects for civic spaces and streets. The installation of living green walls will be encouraged to the fullest possible extent throughout the city of Dublin and tree pits with mixed planting will be preferred for the greening of streets in recognition of the co-benefits they offer for SuDs, biodiversity, amenity value and traffic calming.</p>	<p>See the response for policy G11. Careful list of planting and trees have been selected in collaboration with the ecologist in order to provide the most suitable softscape layout and enhance the biodiversity of the area.</p> <p>SuD s and nature-based solutions have been incorporated into the project design via the provision of roof gardens and planted areas at ground and podium level, as well as the provision of green and blue roofs which will positively contribute to the landscape value providing opportunities for biodiversity. Permeable paving, tree pits, bio-retention areas and swales are also proposed to manage and treat surface water across the site. Please also refer to the <i>Site Specific Flood Risk Assessment</i> prepared by DBFL Consulting Engineers which concludes that the proposed development is appropriate for the site’s flood zone category and the sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to.</p>
<p>G16</p>	<p>New Development / New Growth Areas To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contributes to the city’s green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development.</p>	<p>A key feature of the scheme design is the retention and enhancement of the existing natural asset of the site; the scheme incorporates areas of publicly accessible natural and semi-natural open space that will form part of the Green Infrastructure of this part of the city, in particular through the retention of the existing trees and proposed areas of native planting and wildflowers. These areas of vegetation will contribute to the overall ecosystem services provision in this built-up urban area; including through storm water control and management and pollinator resource provision.</p>

<p>GI7</p>	<p>Connecting Greening Elements in Site Design To avoid the fragmentation of green spaces in site design and to link green spaces /greening elements to existing adjacent green infrastructure / the public realm where feasible and to provide for ecological functions.</p>	<p>The proposed development will retain habitat and green infrastructure connectivity at the site through the various areas of green space within and around same, along with the woodland belts along its eastern and northern boundaries. The scheme is keen to create a strong linkage within the site boundary; however, the new green asset and landscape setting will contribute to creating a new destination in the neighbourhood area that will be adding value to the existing green infrastructure. A key feature of the scheme design is the retention and enhancement of the existing natural asset of the site, and opening the site up for the public to utilise.</p>
<p>GIO1</p>	<p>Green Roof Guidance Document (2021) The use of green / blue roofs in developments will be in accordance with the requirements of the Dublin City Council Green and Blue Roof Guide Document (2021), see Appendix 11.</p>	<p>Green / Blue Roofs are provided for the development. Green / Blue Roof provision exceeds DCC's minimum coverage of 70%. The scheme will offer in a variety of location intensive /extensive green roof and blue roofs that will support the vision of a greener and liveable city. The requirements indicated on Green &Blue Roof Guide (2021) and Appendix 11 Technical Summary of Dublin City Council Green and Blue Roof Guide (2021) ; Appendix 12 Technical Summary of Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021) the key principles of design have been carefully included. Please refer to DBFL Consulting Engineers <i>Infrastructure Design Report</i> and relevant drawings and <i>Cameo's Landscape Design and Access Statement</i> for further information. It is envisioned that the scheme includes roof areas in excess of 100sq.metre and Green/ Blue Roofs are required as stated on Green &Blue Roof Guide (2021) and Policy SI23.</p>
<p>GI9</p>	<p>European Union Natura 2000 Sites To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation</p>	<p>An <i>Appropriate Assessment Screening Report</i> has been prepared for the proposed development, confirming that no potential sources of significant adverse effects on EU sites, as a result of the development, have been identified.</p>

	(SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites).	
Gl10	<p>Flora and Fauna Protected under National and European Legislation Located Outside Designated Areas</p> <p>To adequately protect flora and fauna (under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022, wherever they occur within Dublin City, or have been identified as supporting the favourable conservation condition of any European sites.</p>	<p>DNV has prepared the EIAR Biodiversity Chapter (Chapter 8) for the proposed development. This assessment considers potential impacts on species including birds, bats, flora, and other fauna, informed by specialist surveys where required. Mitigation and enhancement measures are detailed within the chapter to address potential impacts and improve site biodiversity. When implemented in full, these measures will ensure no likely significant effects on protected flora or fauna.</p> <p>Additionally, a <i>Biodiversity Enhancement Plan</i> and a <i>Biodiversity Management Plan</i> has been prepared by DNV, outlining how the development will integrate and support biodiversity into the future.</p>
Gl11	<p>Proposed Natural Heritage Areas</p> <p>To protect and enhance the ecological functions and connectivity of habitats and species of proposed Natural Heritage Areas (pNHAs) to be designated by the National Parks and Wildlife Service (NPWS).</p>	<p>DNV has prepared the EIAR Biodiversity Chapter (Chapter 8) for the proposed development. This assessment considers potential impacts on designated sites (including proposed natural heritage areas). Where potential sources of adverse effects were identified, the chapter specifies the mitigation measures required to address them. When these measures are fully implemented, no likely significant effects on designated sites are anticipated as a result of the proposed development.</p>
Gl12	<p>National and International Sites for Nature Conservation</p> <p>To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.</p>	<p>As noted above, DNV has prepared the EIAR Biodiversity Chapter for the proposed development. This assessment considers potential impacts on designated sites, such as the Dublin Bay Biosphere. Where potential sources of adverse effects were identified, the chapter outlines the mitigation measures required to address them. When these measures are fully implemented, no likely significant effects on designated sites are anticipated as a result of the proposed development.</p>

<p>Gl13</p>	<p>Areas of Ecological Importance for Protected Species To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in accordance with development standards set out in this plan.</p>	<p>As noted above, an EIAR Biodiversity Chapter has been prepared for the proposed development application. This assessment included consideration of potential impacts to designated sites. Where any potential sources of adverse effects to same as a result of the proposed development were identified, the Chapter details the mitigation measures that will be required to address them. Once these mitigation measures are followed in full, there will be no likely significant effects on any designated sites as a result of the proposed development.</p>
<p>Gl14</p>	<p>Ecological / Wildlife Corridors To maintain and strengthen the integrity of the city's ecological corridors and stepping stones which enable species to move through the city, by increasing their connectivity [to be shown in the proposed Green Infrastructure Strategy] under Article 10 of the EU Habitats Directive. Development proposals should not compromise their ecological functions and should realise opportunities to contribute to enhancing the nature conservation value of them by landscaping that provides complementary habitats. An Ecological Impact Assessment will be required for any proposed development likely to have a significant impact on habitats and species of interest on or adjacent an ecological corridor.</p>	<p>DNV has prepared the EIAR Biodiversity Chapter for the proposed development, which includes an ecological impact assessment. This assessment considers potential impacts on designated sites, flora, fauna, areas of importance to wildlife, and nearby ecological corridors. The proposed development will retain most of the existing woodland and increase tree cover and shrub planting, ensuring the site continues to contribute to the area's green infrastructure.</p>
<p>Gl15</p>	<p>Inland and Sea Fisheries To protect inland and sea fisheries and take full account of Inland Fisheries Ireland Guidelines 'Planning for Watercourses in the Urban Environment' 2020, when undertaking, approving or authorising development or works which may impact on rivers, streams, watercourses, estuaries, shorelines and their associated habitats. To protect sea angling sites designated by Inland Fisheries</p>	<p>The proposed development is not located along any waterbodies. The EIAR Biodiversity Chapter includes an assessment of the potential for impacts to aquatic species as a result of the proposed development.</p>

	Ireland at the North and South Bull Walls and at Dollymount and Sandymount Strands.	
Gl16	<p>Habitat Creation and New Development</p> <p>That new developments (as appropriate) will be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.</p>	<p>Swift nesting blocks, insect hotels, wood logs, and bat boxes have been incorporated into the the proposed development, which will support local biodiversity. A <i>Biodiversity Enhancement Plan</i> has been prepared for the proposed development and details how it will support local biodiversity into the future.</p> <p>Please refer to the suite of landscape drawings prepared by Cameo. These landscape drawings illustrate the green infrastructure strategy for the development and the key publicly available pedestrian and cyclist linkages throughout the site, which will support the green infrastructure strategy of the city. New generation of trees, retained trees and selected planting aim to enhance the biodiversity of the site; planting of wildflower meadow and green roofs will provide habitat for pollinators, planting of native shrubs in woodland will enhance its function as a wildlife corridor providing habitat and cover for mammals and birds.</p>
Gl17	<p>Habitat Restoration</p> <p>To increase the percentage of restored and naturalised areas on public land in the city. That new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-term maintenance to limit degradation.</p>	<p>A <i>Biodiversity Enhancement Plan</i> and a <i>Biodiversity Management Plan</i> have been prepared for the proposed development and details how it will support local biodiversity into the future. The proposed development's landscaping provides for increased tree, shrub and other planting to replace any vegetation lost at the site.</p>
Gl18	<p>Minimise Impact – Light and Noise</p> <p>To minimise the environmental impact of external lighting and noise at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection of sensitive species</p>	<p>Bat friendly lighting has been incorporated into the design as detailed in the EIAR Biodiversity Chapter.</p>

	such as bats (see also Section 9.5.9 Public & External Lighting).	
GIO7	National Biodiversity Action Plan 2017-2021 To support the management targets for nature conservation sites set out in the National Biodiversity Action Plan 2017 (and as updated) and the objectives for local authorities to address threats to biodiversity.	The proposed development will continue to provide and support biodiversity at the site and will not impact on any designated sites.
GIO8	Dublin City Biodiversity Action Plan 2021 - 2025 To support the implementation of the 'Dublin City Biodiversity Action Plan 2021–2025' (or as updated), which sets out key themes and objectives for biodiversity conservation and restoration and measurable targets and actions, in partnership with all relevant stakeholders.	The proposed development will continue to provide and support biodiversity at the site through the inclusion of semi-natural habitats and resources for local flora and fauna.
GIO9	Invasive Alien Species To support measures to prevent the introduction of and to control the spread of invasive alien species in Dublin City in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 and EU Regulations 1143/2014 and to implement the targets and actions set out in the Dublin City Invasive Alien Species Action Plan 2016 – 2020 (or as updated).	The submitted application includes an <i>Invasive Alien Species Management Plan</i> which details the measures to be adhered to in order to manage the invasive alien species present at the site.
GIO10	All Ireland Pollinator Plan 2021 - 2025 To have regard to the all-Ireland Pollinator Plan 2021 – 2025 in the management of the Council's open spaces, parks and roadside verges and to encourage the pollination of vacant, derelict and temporary sites through measures to protect and increase the populations of native wild bees and other pollinators.	The All-Ireland Pollinator Plan 2021 – 2025 has been considered in the landscaping proposed for the site and in the <i>Biodiversity Enhancement Plan</i> .

GIO13	<p>Dublin City Habitat Map and Database</p> <p>To protect and improve connectivity of habitats and to prevent habitat loss and fragmentation through urban land use change, development and management through the use of the Dublin City Habitat Map and Database (2020, and updates) to inform planning decisions.</p>	<p>The proposed development entails the retention of the majority of woodland at the site and will ensure that habitat connectivity continues to be maintained therein. Habitats to be lost at the site as a result of the proposed development are predominantly rank grassland (Fossitt code: GS2), with the higher value habitats present to be largely retained and bolstered by landscape planting, and maintaining green corridors for connectivity e.g., woodland and woodland understory planting.</p>
GI19	<p>Protect and Enhance Landscapes</p> <p>To continue to protect and enhance the city's landscape and seascape, the amenities of places and features of natural beauty and interest, through sustainable planning and design for both the existing community and for future generations in accordance with the National Landscape Strategy 2015 – 2025 and any updated strategy.</p>	<p>The proposed development will ensure the site will provide an impressive semi-natural landscape for residents and locals, through public access and the retention of the distinctive woodland belts and the provision of biodiversity enhancement therein.</p>
GI20	<p>Views and Prospects</p> <p>To protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage.</p>	<p>A Landscape and Visual Impact Assessment has been prepared by Modelworks and forms Chapter 9 of the EIAR. It is confirmed in that chapter that <i>there "are no views or prospects identified for protection in the site's receiving environment"</i>.</p>
GI21	<p>Promote City Landscape</p> <p>To promote the city landscapes, including rivers, canals, Dublin Mountains and Dublin Bay, as a major resource for the city and forming core areas of the green infrastructure network.</p>	<p>The proposed development will enhance the landscape and amenity area available in this area of Dublin City and will contribute to green infrastructure.</p>
GI24	<p>Multi-Functionality (GI)</p> <p>To incorporate new open space into the green infrastructure network for the city, and providing a multi-functional role including: outdoor recreation, biodiversity, urban drainage, flood management, connection and carbon absorption without compromising public access to</p>	<p>The subject development will significantly contribute to the strategic green network in Dublin City. The open space will include natural play facilities specifically aimed at connecting children with nature as main focus within the area. There will also be an opportunity for adult engagement through natural gym equipment. The proposals will clear out all undesirable, invasive or low-value planting to maximise sunlight</p>

	and the amenity function of open space (see Section 15.6: Green Infrastructure and Landscaping).	penetration from the south into the proposed open lawn areas, encouraging activity in the open ground, where more 'active play' and relaxation can take place while maintaining and preserving the good tree species that are present. The overall landscape design focuses on creating a sustainable open environment that is durable in design and resilient to climate change and to the demands of its new residents and future users.
Gl25	<p>Open Space Provision (sq. m.) per 1,000 Persons Benchmark</p> <p>To ensure equality of access for all citizens to the public parks and open spaces in Dublin City and to promote more open space with increased accessibility and passive surveillance where feasible. In this regard, a city wide range of 2.5ha to 3.6ha of parks per 1,000 population benchmark for green/recreational space as set out in the 2019 Parks Strategy (or as updated) shall be a policy goal and quality standard.</p>	Please see enclosed a <i>Universal Access Statement</i> prepared by O'Herlihy Access Consultancy, which notes that " <i>various accessible landscaped areas are provided throughout the site will be designed to meet the guidance in Section 1.1 of TGD M 2022</i> ".
Gl28	<p>New Residential Development</p> <p>To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.</p>	The scheme includes a large quantum of accessible public open space including children's play space. The public open space includes a local park which will include dedicated play areas, gathering sitting areas, street furniture, sheltered cycle stands, fitness trails and will create a new civic plaza. Majority of the areas identified as public open space will be represented by green areas such as open lawns, wildflower meadows and shrub buffering.
Gl40	<p>Tree Planting - General</p> <p>To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native</p>	Tree protection and enhancement has been a key tenet of the proposed design. The trees that will be removed will be replaced by a significant number of large and medium size trees that will have a greater long-term benefit to local ecology and biodiversity. In particular 20 No. different species of trees will be planted in order to increase the biodiversity asset of the area. A significant number of large and medium

	<p>species as appropriate to the location of the development in the interests of natural heritage, amenity, environmental quality and climate resilience.</p>	<p>size new generation trees will be provided on the site and these will have a greater long-term benefit to local ecology and biodiversity. Pollinator friendly planting will be provided, including wildflower meadow, native trees and shrubs. The woodland will be enhanced by planting of native shrubs in the groundcover. Following the BS 8545:2014 all newly planted trees will be able to grow with vigour appropriate to the species and situation, in good health, to achieve the desired planting objectives.</p>
Gl41	<p>Protect Existing Trees as Part of New Development To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.</p>	<p>Details of tree protection measures, including how to protect root systems, stems, and canopy, with allowance for future movement and growth, are provided by CMK Hort & Arb Ltd within the <i>Arboricultural Assessment, Arboricultural Impact & Tree Protection Strategy Report</i> and are shown on Tree Protection drawings. Existing trees on site informed and influenced the design team since the early days of the design process. The currently limited management of the trees on site to date has resulted in strong competition between trees. Tree protection and enhancement has been a key tenet of the proposed design. The trees that will be removed will be replaced by a significant number of large and medium size trees that will have a greater long-term benefit to local ecology and biodiversity. In addition to this, the build-up of the paved area in the proximity of the retained trees will grant a specific build-up to ensure and guarantee the protection of the tree roots.</p>
Gl42	<p>Tree Management To adopt a pro-active and systematic good practice approach to tree management with the aim of promoting good tree health, condition, diversity, public amenity and a balanced age-profile and as per Dublin City Tree Strategy 2016.</p>	<p>Tree management proposals for retained trees during construction are outlined within the <i>Arboricultural Assessment, Arboricultural Impact & Tree Protection Strategy</i> report. Tree protection and enhancement has been a key tenet of the proposed design.</p>
Gl43	<p>Hedgerows To protect and enhance the City's hedgerow network, in particular, hedgerows that form townland, parish and</p>	<p>The development will enhance existing amenity uses (currently non-existent at the site). The development includes planting of native shrubs as groundcover in the 'woodland 'which will provide habitat for</p>

	barony boundaries. It is Council policy to increase hedgerow coverage and promote the planting of hedgerows in new developments using native species.	mammals and breeding birds and strengthen the boundary woodlands function as a green infrastructure corridor. Measures are implemented to ensure that biodiversity is not compromised, including lighting designed to accommodate bats commuting and foraging in the area (refer to Biodiversity Chapter of EIAR).
Gl44	Resilient Urban Forest To deliver and manage a resilient urban forest for the City to help increase resilience to the effects of climate change to consist of native and exotic trees and to target and prioritise locations in the city with a low canopy cover for an increased level of tree cover.	Diversity of new tree population within site is reflected in landscape architecture proposals.
GIO41	Dublin City Tree Strategy 2016 To support the implementation of the Dublin City Tree Strategy 2016 and any future revision thereof, which sets a vision for the long-term planting, protection and maintenance of trees, hedgerows and woodlands within Dublin City.	This is supported by the retention of existing trees and new tree plantings as outlined by landscape architects.
GIO42	Trees as Wildlife Corridor or 'Stepping Stones' To protect trees, hedgerows or groups of trees which function as wildlife corridors or 'stepping stones' in accordance with Article 10 of the EU Habitats Directive.	This is supported by the retention of existing trees where possible, which provide links to neighbouring tree populations within public and private lands.
Gl45	National Physical Activity Plan 2016 To improve the health and well-being of communities by increasing access to participation in sports, recreation and healthy activity in line with the National Physical Activity Plan 2016, the Healthy Ireland Framework 2019 – 2025 and the Sport Ireland Participation Plan 2021 – 2024.	The proposed development includes a variety of open spaces which will contribute towards improving the health and well-being of the community.

G151	<p>Children’s Playing Facilities - General</p> <p>To seek the provision of children’s playing facilities that encompasses local and public places and spaces for play that are accessible and inclusive for children and young people of all ages, abilities and socio-economic backgrounds.</p>	<p>The overall design aspiration for the scheme is to make the public space child friendly through the provision of well-located, well-designed spaces that are accessible. Pedestrian priority is a key driver in the design and there are informal opportunities for ‘playable’ and ‘social’ space throughout the landscape and creative play is encouraged through the incorporation of a number of different elements within these spaces. Incidental play opportunities in the public open space will be provided in a number of locations (courtyard and parkland). Play opportunities are targeted for specific age groups (should be considered fluid as to which age they encompass). Please refer to the <i>Landscape Design and Access Statement</i> for details.</p>
G152	<p>Children’s Playing facilities in New Residential and Mixed Developments</p> <p>To seek the provision of children’s playing facilities in new residential developments and mixed developments with a residential element. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.</p>	<p>See response to Policy G152 above.</p>
Chapter 11 – Built Heritage and Archaeology		
BHA2	<p>Development of Protected Structures</p> <p>That development will conserve and enhance protected structures and their curtilage and will:</p> <p>(a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.</p> <p>(b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.</p>	<p>The proposed development has comprehensively considered the neighbouring Protected Structures in the vicinity along Sandford Road and Clonskeagh Road in the scheme layout. The large parkland provided with significant tree cover along the northern and eastern boundaries results in the building forms being set back from the boundaries, which will ensure that the development is appropriately screened as viewed from the Protected Structures opposite on Sandford Road and Clonskeagh Road.</p> <p>We note there are existing dwellings located in Norwood Park between Protected Structures to the north-west of the site and the subject</p>

	<p>(c) Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation.</p> <p>(d) Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.</p> <p>(c) Ensure that the form and structural integrity of the protected structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the protected structure.</p> <p>(d) Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.</p> <p>(e) Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the protected structure.</p> <p>(f) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.</p> <p>(g) Ensure historic landscapes, gardens and trees (in good condition) associated with protected structures are protected from inappropriate development.</p> <p>(h) Have regard to ecological considerations for example, protection of species such as bats.</p>	<p>development. Nonetheless, there is a large area of public open space provided along this northern boundary which will provide a natural setback between the subject development and the Protected Structures. Therefore, it is considered that the character of the Protected Structures will not be materially impacted by the proposed development.</p>
BHA6	<p>Buildings on Historic Maps</p> <p>That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance</p>	<p>Milltown Park House (Building A), constructed between 1756 and 1782, occupied the site prior to 1847, with all other structures constructed between 1860 and 1955. Please refer to Appendix 7.3 of the enclosed</p>

	<p>Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report this it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).</p>	<p>EIAR 'Chronological Drawings of Existing Building Range' for further detail.</p> <p>It is noted that the primary 18th century structure of Milltown Park House survives, albeit with extensive internal modifications. The 18th century form is most visible at basement level, extending under Building B (rear extension).</p> <p>However, notwithstanding an inventory and appraisal attached to the SHD, the structure has not been recommended for inclusion on the Record of Protected Structures. It is not included in any event in the NIAH owing to the remit of that study.</p> <p>The site is not within an ACA. An archaeological study by Archer Archaeology (Chapter 6 of the EIAR) does not assign specific significance to the site.</p> <p>On this basis, together with the extent of alterations to the structure, its demolition is deemed necessary by the applicant to deliver the development.</p>
BHA7	<p>Architectural Conservation Areas (a) To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area, and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.</p>	<p>The subject site is not located within an Architectural Conservation Area (ACA), however the Belmont Avenue/Mount Eden Road Architectural Conservation Area is located opposing Sandford Road to the north of the site.</p> <p>The sensitive status of the ACA has been duly considered as part of the design process of the subject scheme having regard to the following:</p> <ul style="list-style-type: none"> • The natural set back provided between the site and the ACA due to the position of Sandford Road which runs between the northern boundary of the site and the southern boundary of the ACA;

	<p>(b) Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA.</p> <p>(c) Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.</p> <p>(d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.</p> <p>(e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.</p> <p>(f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within ACAs.</p> <p>All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access, or requires removal to protect other specimens from disease.</p>	<ul style="list-style-type: none"> • The position of built forms within the site which are set back from the northern boundary with Sandford Road; and • The provision of public open space along this northern boundary naturally ensures that the building forms are set back from the ACA and sylvan character as enjoyed from the west side of the ACA is maintained. <p>The large parkland provided with significant tree cover along the northern and eastern boundaries results in the building forms being set back from the boundaries, which will ensure that the development is appropriately screened.</p>
BHA9	<p>Conservation Areas</p> <p>To protect the special interest and character of all Dublin's Conservation Areas – identified under Z8 and Z2 zoning objectives and denoted by red line conservation hatching on the zoning maps. Development within or affecting a</p>	<p>Neighbouring dwellings in Norwood Park and Cherryfield Avenue Upper and Lower are zoned Z2 – Residential Conservation Areas and the development have been designed to ensure that no negative material impacts will occur on these areas.</p>

	<p>Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.</p> <p>Enhancement opportunities may include:</p> <ol style="list-style-type: none"> 1. Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting. 2. Re-instatement of missing architectural detail or important features. 3. Improvement of open spaces and the wider public realm and reinstatement of historic routes and characteristic plot patterns. 4. Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area. 5. The repair and retention of shop and pub fronts of architectural interest. 6. Retention of buildings and features that contribute to the overall character and integrity of the Conservation Area. 7. The return of buildings to residential use. <p>Changes of use will be acceptable where in compliance with the zoning objectives and where they make a positive contribution to the character, function and appearance of the Conservation Area and its setting. The Council will consider the contribution of existing uses to the special interest of an area when assessing change of use applications, and will promote compatible uses which ensure future long-term viability.</p>	<p>Abrupt transitions in scale and use have been avoided in areas adjacent to these properties. The development is set back from the surrounding areas having regard to the extensive public open space provided.</p> <p>In addition, the western boundary is made up of modest 2 No. storey houses and the 3 No. storey element of Block D, which highlight that the proposed development has appropriately considered the transition between the development and surrounding properties of Cherryfield Avenue Upper and Lower. Large setbacks of between c. 32.5 metres and c. 50 metres have been provided between the Norwood Park dwellings and Block C which ranges in height between 4 No. and 7 No. storeys, with the height of the building being 4 No. and 5 No. storeys at the closest points to the neighbouring dwellings.</p>
BHA11	<p>Rehabilitation and Reuse of Existing Older Buildings</p> <p>(a) To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older</p>	<p>The proposed development includes the reuse of Tabor House and the Chapel to provide community/cultural space. The reuse and refurbishment of Tabor House and the Chapel will allow a new setting</p>

	<p>buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment.</p> <p>(b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.</p> <p>(c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.</p>	<p>to be created in the landscape and the buildings will act as a focal point for the development especially entering the principal entrance from Milltown Road or walking through the pedestrian street from the northern end with glimpses of Tabor House shown through the setback of Block B.</p> <p>The building elements to be demolished were considered for various uses however having regard to the existing limited floor-to-ceiling heights and poor infiltration of daylight to the building grouping as determined in studies by OMP for example, in addition to quantum of alterations that would be required which would essentially dramatically alter the appearance of some of the existing fabric, it was concluded by the applicant that their adaption was not viable or in the best interests of the overall Masterplan for the site.</p> <p>Please find the Existing Feasibility Study attached as an Appendix to the OMP <i>Masterplan and Architectural Design Statement</i>. A Report entitled <i>Justification for Demolition Report</i> prepared by OCSC is also enclosed separately with this application.</p>
BHA15	<p>Twentieth Century Buildings and Structures</p> <p>(a) To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.</p> <p>(b) To encourage the retention and reinstatement of internal and external features, that contribute to the character of exemplar twentieth century buildings, such as roofscapes, boundary treatments, fenestration pattern, materials, and other features, fixtures and fittings (including furniture and art work), considered worthy of retention.</p>	<p>Numerous 20th century buildings occupy the subject development site. The building of most note is the Archive, Building F. The building has not been added to the Record of Protected Structures, notwithstanding multiple planning applications containing building assessments stating its significance.</p> <p>Chapter 7 of the EIAR (Architectural Heritage) by Molloy and Associates notes the following in relation to Building F:</p> <p><i>"Whilst of interest, its function is wholly connected with its form. A study carried out by OMP examines potential re-use and concludes that its re-use for any purpose other than an archive would effectively remove its key features, such as stairs, galleries,</i></p>

		<p><i>linings and fittings. With the loss of these elements, and expression of the original external form only, the building's significance would be irreversibly compromised."</i></p> <p>On this account, its demolition is deemed necessary to deliver the development.</p>
BHA21	<p>Retrofitting Sustainability Measures</p> <p>To have regard to the Department of Environment, Heritage and Local Government's publication on Energy Efficiency in Traditional Buildings (2010) and the Irish Standard IS EN 16883:2017 Conservation of Cultural Heritage- Guidelines for Improving the Energy Performance of Historic Buildings (2017) and any future updates or advisory documents in assessing proposed works on heritage buildings.</p>	<p>It is proposed to adhere with statutory guidance, insofar as possible, in the retrofitting of the retained Chapel and Tabor House, bearing in mind that although not protected structures, protecting their interest as heritage buildings is dependent on their long term, comfortable use, a central objective of statutory guidelines.</p>
BHA22	<p>Upgrading Environmental Performance</p> <p>To ensure a sustainable future for historic and other buildings subject to heritage protection, the City Council will encourage, and support works to upgrade the environmental performance of the existing building stock that incorporates good standards of design and appearance. Where these works involve historic buildings subject to protection (this includes buildings referenced on the Record of Protected Structures and non-protected structures in an Architectural Conservation Area), the works shall not adversely affect the special interest of the structure and thus a sensitive approach will be required, taking into account:</p> <ul style="list-style-type: none"> • The significance of the structure, and • The extent of intervention, including impact on historic fabric, the technical requirements of a 	<p>It is proposed, where possible without adversely impacting the retained Chapel and Tabor House structures, to introduce measures to improve energy performance.</p>

	<p>traditionally constructed building, visibility, siting and design.</p> <p>The installation of renewable energy measures and equipment will be acceptable where sited and designed to minimise the visual impact and does not result in any significant loss of historic fabric or otherwise affect the significance of the structure.</p>	
BHA24	<p>Reuse and Refurbishment of Historic Buildings</p> <p>Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership.</p>	<p>Tabor House and the Chapel will be positively refurbished as part of the development in a careful manner. These buildings will comprise community/cultural space.</p>
BHA26	<p>Archaeological Heritage</p> <p>1. To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.</p> <p>2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation</p>	<p>There are no recorded monuments or places situated within the site boundary. No potential archaeological features were recorded in historical maps or aerial photographs. There are some monuments in proximity to the site. All ground disturbance works / construction groundworks across the development site will be monitored by a suitably qualified archaeologist.</p>

	<p>design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994.</p> <p>3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.</p> <p>4. Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.</p> <p>5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.</p> <p>6. Preserve the character, setting, and amenity of upstanding and below ground town wall defences.</p>	
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	<p>7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment.</p> <p>8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.</p>	
BHAO19	<p>Built Heritage and Archaeology To provide for the protection, preservation and promotion of built heritage, including architectural heritage, archaeological heritage and underwater heritage, and support the in situ presentation and interpretation of archaeological finds within new developments.</p>	<p>As set out in the <i>Archaeology and Cultural Heritage</i> Chapter of the EIAR (Chapter 6):</p> <p><i>"Should archaeological material be identified in the course of monitoring, the appropriate treatment (i.e. preservation by record/licensed archaeological excavation or preservation in situ/avoidance) of these putative remains will be determined in consultation with the statutory bodies (DHLGH & NMI)."</i></p>
Chapter 12 – Culture		
CU1	<p>Shared Vision for Culture To lead and support the development of a shared vision for culture in the city in collaboration with cultural institutions and other cultural bodies in recognition of their key role and contribution to the cultural life of the city.</p>	<p>The provision of culture/community space in the scheme will contribute towards achieving this policy.</p>
CU2	<p>Cultural Infrastructure To ensure the continued development of Dublin as a culturally vibrant, creative and diverse city with a broad range of cultural activities provided throughout the city, underpinned by quality cultural infrastructure.</p>	<p>The provision of culture/community space in the scheme will contribute towards achieving this policy.</p>

CU4	<p>Cultural Resources</p> <p>To support the development of new and expanded cultural resources and facilities within the city that enrich the lives of citizens and visitors, provide new opportunities for engagement and celebrate aspects of our history and culture.</p>	<p>The provision of culture/community space in the scheme will contribute towards achieving this policy.</p>
CU7	<p>Cultural Clusters and Hubs</p> <p>To support existing, and encourage the growth of, emerging cultural clusters and hubs within the city, which bring together cultural activities interlinked with supporting uses (such as restaurants, retail, galleries and venues) to create vibrant, defined cultural quarters and communities within the city that give a variety of cultural experiences to all.</p>	<p>The provision of culture/community space in the scheme will contribute towards achieving this policy.</p>
CU17	<p>Design of Cultural and Arts Facilities</p> <p>To promote a co-design approach to cultural and arts facilities and that applicants and developers consider the Toolkit guide for artform specific workplace to inform the design of such spaces.</p>	<p>Turley have utilised the DCC Guidance Note 1 & 2 and Toolkit Resources 1, 2 and 3 in the preparation of the <i>Cultural Infrastructure (Impact) Assessment</i>. Please refer to the Report for further details</p>
CUO30	<p>Co-Design and Audits</p> <p>Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (CUO44 refers), be required to undertake a cultural audit for the local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural</p>	<p>A <i>Cultural Infrastructure (Impact) Assessment</i> is enclosed which has been prepared by Turley.</p>

	mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps.	
CUO31	<p>Artist Workspaces</p> <p>To further develop and provide for artist work spaces and spaces for creative production within the city and avail of opportunities for utilising underused buildings within communities for artistic and cultural purposes.</p>	The final layout of the community/cultural space will be developed in conjunction with Dublin City Council through compliance. To identify occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process.
CUO33	<p>Music Rehearsal Spaces</p> <p>To seek opportunities to include facilities for music rehearsal spaces within communities to enable and encourage more people to engage with music, with a particular focus on young people.</p>	The final layout of the community/cultural space will be developed in conjunction with Dublin City Council through compliance. To identify occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process.
CUO37	<p>Audio and Visual Community Spaces</p> <p>To work with local stakeholders to seek the delivery of audio and visual community spaces such as community radio studios and recording spaces across the city suburbs and where the opportunity arises. To seek to integrate provision for cinema events space within urban villages by ensuring that the design of future community facilities can accommodate cinema events.</p>	The final layout of the community/cultural space will be developed in conjunction with Dublin City Council through compliance. To identify occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process.
CUO54	<p>Naming of New developments</p> <p>To ensure that all new developments are named in the Irish language only, to redress the historic under-representation of Irish language names in the City; whilst also reflecting the rich diversity of history and origins of place names and townland names within Dublin and also names that are reflective the social history of each place. All place names installed for new streets or estates must be bi-lingual.</p>	Will be agreed at compliance stage with Dublin City Council.

CU29	<p>Public Realm for Cultural Events To encourage greater use of the public realm for cultural events to make the inner city and urban villages more attractive to those with young families for both day and night time events, and to seek provision of new public spaces for outdoor performance that are designed and fitted to host a range of events.</p>	<p>Tabor House and the Chapel will provide culture/community space in the scheme. In addition to this, there is also a proposed 'Secret Garden' outdoor space which will form part of the cultural/ community allocation in the landscaping behind Tabor House. This will encourage use of the public realm for cultural events.</p>
CUO58	<p>Public Art All large scale regeneration schemes, whether lodged for planning as a single or multiple applications; where the total scale of regeneration exceeds 25,000 sq. m. shall be required to include an element of public art.</p>	<p>The scheme includes provision for public art in the public plaza area and adjacent to the 'Secret Garden'. Please refer to the <i>Landscape Design Report</i> by Cameo and Partners Design Studio.</p>
Chapter 15 – Development Standards		
15.3.1	<p>To facilitate the proper assessment of a development proposal in circumstances where it is considered that a proposed development would be likely to have a significant effect on the environment, due to the nature, scale or location of the proposal, Dublin City Council will require the submission of an Environmental Impact Statement in accordance with the provisions of the Planning and Development Regulations 2001, as amended.</p>	<p>An <i>Environmental Impact Assessment Report (EIAR)</i> has been prepared and is submitted with this planning application.</p>
15.3.2	<p>All applications will be screened for AA by the competent authority (Dublin City Council) as part of the planning process. Applicants are however, required to carry out a screening statement and subsequent Stage 2 assessment (if necessary) for inclusion with the planning application.</p>	<p>DNV have prepared an <i>Appropriate Assessment Screening Report</i> to accompany this planning application. A Stage 2 assessment was not deemed necessary.</p>
15.3.3	<p>An Ecological Impact Assessment should be carried out for all developments within or adjacent to any sensitive habitat, ecological corridor, specific landscape character</p>	<p>A Biodiversity Chapter forms part of the <i>EIAR</i> (Chapter 8), which has been prepared by DNV.</p>

	<p>area or which has the potential to contain protected habitats or species.</p>	
<p>15.4.1</p>	<p>Healthy Placemaking</p> <p>Key principles to consider are:</p> <ul style="list-style-type: none"> • The contribution to the public realm for the benefit and / or enjoyment of the locality. • The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets. • The use of high quality materials and finishes including hard and soft landscaping. • The orientation of open space and the accessibility to daylight and sunlight. • Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets. • The accessibility of the development and the traffic calming measures in place in accordance with DMURS. • The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc. • Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged. 	<p>Healthy placemaking principles have been embedded into the design of the proposed development. The proposed development will result in the redevelopment of a highly underutilised site, thereby enhancing the public realm and healthy placemaking through the creation of a more attractive and desirable environment. See <i>Masterplan & Architectural Design Statement</i> for details.</p>

<p>15.4.2</p>	<p>Architectural Design Quality</p> <p>Key principles to consider are:</p> <ul style="list-style-type: none"> • The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site. • The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered. • The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting. • The suitability of the proposed design to its intended land use and the wider land-use character of the area, along with its relationship with and contribution to the public realm. • The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special interest and important views and that the design incorporates high quality detail, materials and craftsmanship. 	<p>The proposed development is of a high architectural design quality and has a character that relates to the existing context. See <i>Masterplan & Architectural Design Statement</i> for details.</p>
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	<ul style="list-style-type: none"> • The need to protect and enhance natural features of the site, including trees and any landscape setting. • The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling. • The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces. <p>Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity.</p>	
15.4.3	<p>Sustainability and Climate Action</p> <p>To minimise the waste embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new build.</p> <p>Key sustainable design principles to consider are (See also Section 15.6 on Green Infrastructure):</p> <ul style="list-style-type: none"> • Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies. • Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain. 	<p>The proposed development embeds sustainability design principles. See <i>Masterplan & Architectural Design Statement</i> and the <i>Energy & Sustainability Report</i> for details.</p>

	<ul style="list-style-type: none"> • Materials should be selected which are sustainably sourced and existing materials re-used and recycled wherever possible. The use of green building materials and low embodied energy products such as low carbon cement and recycled materials is encouraged. • Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10. • Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council’s Surface Water Management Guidance – see policy SI25. • New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council’s Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23. <p>For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA11, CA15, CA16, CA17, CA18 and Section 15.7.2 below.</p>	
15.4.4	Development proposals, including all new large scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and	The proposed development and the external road works have been designed in accordance with DMURS. The works have been subject to a Quality Audit and the appropriate number of mobility impaired car

	<p>convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities...public buildings should ensure appropriate disability access, including disability car parking where feasible.</p>	<p>parking have been provided. A <i>Universal Access Statement</i> by O'Herlihy Access Consulting has also been prepared and submitted.</p>
	<p>Dublin City Council will have regard to the Universal Design Guidelines for Homes in Ireland issued by the National Disability Authority and Housing Options for our Ageing Population, issued by the Department of Housing, Local Government and Heritage and the Department of Health, the National Disability Authority's Building For Everyone: A Universal Design Approach 2012 and will seek to encourage the implementation of best practice standards with regard to access in relation to both indoor and outdoor environments. Part M of the Building Regulations sets out standards to ensure that buildings are accessible and usable by everyone, including the aged, people with disabilities and people with children. The Technical Guidance Document in relation to Part M provides guidance on the access requirements for public buildings and for residential dwellings.</p>	<p>The proposed development is designed to comply with TGD Part M and a minimum of 50% of the larger than minimum sized units are designed having regard to the relevant Universal Design Guidelines. See the <i>Masterplan & Architectural Design Statement</i> for details.</p>
<p>15.4.5</p>	<p>Safe and Secure Design</p> <p>All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).</p>	<p>The proposed development is designed with safety and security guidance and best practice. Please see the Community Safety Strategy in the <i>Masterplan & Architectural Design Statement</i> for details.</p>

	<p>New developments and refurbishments should be designed to promote safety and security and avoid anti-social behaviour by:</p> <ul style="list-style-type: none"> • Maximising passive surveillance of streets, open spaces, play areas and surface parking. • Avoiding the creation of blank facades, dark or secluded areas or enclosed public areas. • Eliminating leftover pockets of land with no clear purpose. • Providing adequate lighting. • Providing a clear distinction between private and communal or public open space, including robust boundary treatment. • Enabling residents to watch over the entrance to their home; recessed entrances should be avoided and front doors should also be overlooked from other houses or from well-trafficked public areas. • Locating back gardens next to other back gardens or secure private areas rather than on to roadways or other public areas. • Ensuring that the layout and design of roads within residential areas encourages appropriate traffic volumes and speeds. • Providing clear and direct routes through the area for pedestrians and cyclists with safe edge treatment, maintaining clear sight lines at eye level and clear visibility of the route ahead. • Using materials in public areas which are sufficiently robust to discourage vandalism. • Avoiding the planting of fast-growing shrubs and trees where they would obscure lighting or pedestrian routes; shrubs should be set back from the edge of paths. 	
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	<ul style="list-style-type: none"> Consulting with An Garda Síochána crime prevention design advisor where appropriate; Dublin City Council will also have regard to the Guidelines on Joint Policing Committees as established under the Garda Síochána Act 2005 as amended (2014), in order to ensure safe and secure communities. <p>On housing developments over 100 units, the Council will require the submission of a Community Safety Strategy (see objective QHSNO15) which would set out the design features incorporated to address the above measures to ensure a high level of safety and security is maintained including, overlooking, passive surveillance, street lighting and clear accessible routes.</p>	
15.5	<p>In considering the appropriateness of a development at a city scale, applicants should demonstrate that the scheme proposed has adopted an appropriate approach to urban intensification broadly consistent with its location.</p> <p>The key design parameters shall be addressed as part of an Architectural Design Statement to accompany development proposals. Applicants are encouraged to utilise early iterations of the design statement in pre planning consultations with the Planning authority.</p>	<p>The proposed design has considered its appropriateness at a city scale. Previous versions of the early stages of design are included in the <i>Masterplan & Architectural Design Statement</i> and in the Examination of Alternatives Chapter of the <i>EIAR</i>.</p>
15.5.1	<p>Brownfield, Regeneration Sites and Large Scale Development</p> <p>Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale, regeneration and brownfield development:</p>	<p>The proposed development is a large-scale development and has been designed to incorporate the measures set out in Section 15.5.1 as set out throughout the application documentation especially the <i>Masterplan & Architectural Design Statement</i>.</p>

	<ul style="list-style-type: none"> • To encourage innovative, high quality urban design and architectural detail in all new development proposals. • To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area. • To respect and enhance existing natural features of interest. • To contribute to the streetscape creating active and vibrant public realm. • To create animation and create activity at street level and vertically throughout the building. • To provide for appropriate materials and finishes in the context of the surrounding buildings. • To ensure land contamination is appropriately dealt with and mitigated against. • To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network. • To create new compositions and points of interest. • To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area. • To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site. • To prioritise pedestrian and cycle movements in connection with public transport infrastructure. • To retain existing and create new features to make an easily navigational urban environment, 	
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	<p>including active building frontages with clearly defined edges and safe public routes.</p> <ul style="list-style-type: none"> • To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks. • Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood. 	
15.5.7	<p>Materials and Finishes</p> <p>Materials and finishes should be selected to ensure longevity throughout the lifetime of the development. All developments will be required to include details on the maintenance and management of the materials proposed as part of the planning application. As such, Dublin City Council will require developments:</p> <ul style="list-style-type: none"> • To ensure materials and finishes complement the existing pallet of materials in the surrounding area. • Promote durability to ensure a good visual appearance over time. • The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity. • To support the use of structural materials that have low to zero embodied energy and CO₂ emissions as well as the use of sustainably sourced building 	<p>The materials and finishes are selected to ensure longevity for the lifetime of the development. See <i>Masterplan & Architectural Design Statement</i> for details.</p>

	materials and the reuse of demolition and excavated materials.	
15.5.8	<p>Architectural Design Statements</p> <p>Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary. Statements may also be required for large scale commercial development. An Architectural Design Statement is an informative, illustrative document that clearly describes the development proposal, the context in which the development is set and the design rationale for the scheme. Design statements should analyse the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development including the building massing, material and finishes and building articulation, (see also Policy SC23).</p>	A <i>Masterplan & Architectural Design Statement</i> is included in the application.
15.5.9	<p>Models and Photomontages</p> <p>In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted. The inclusion of excessive sunshine, blue sky and any other detailing or colouring which may distort the reliability of the photomontages should be avoided.</p>	The scheme has been modelled by OMP and CGIs and photomontages have been prepared by 3D Design Bureau.

<p>15.6</p>	<p>Green Infrastructure and Landscaping</p> <p>Planning applications will be required to address climate action as part of the overall design of the development and incorporate green infrastructure techniques. All new developments in the city are encouraged to incorporate an ecosystem services approach as a key instrument in achieving sustainable climate change action in accordance with Policy GI5 and GI6.</p> <p>The proposal should indicate how existing natural features of the site will inform sustainable urban form and should include the following:</p> <ul style="list-style-type: none"> • Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design. • The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city’s green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and ‘stepping stones’ to ensure biodiversity protection. • Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent 	<p>An <i>Energy & Sustainability Report</i> prepared by OCSC is enclosed separately which details how the scheme will exceed the requirements to meet Part L and NZEB compliance. The scheme introduces new open spaces and green roofs will benefit the green infrastructure in Dublin City. The scheme incorporates existing mature planting and thus integrates existing natural features. The open spaces will form part of the green infrastructure network in this part of Dublin. The <i>Dublin City Biodiversity Action Plan 2021 – 2025</i> has been considered as part of the scheme proposals.</p>
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	<p>plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.</p>	
15.6.2	<p>Surface Water Management and SuDs</p> <p>All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance (see Appendix 13.)</p> <p>All new developments will also be required to utilise SuDS measures in accordance with Policy SI22 of the development plan. The SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer. Appendix 12 sets out further detail regarding SuDS and should be consulted by all applicants.</p>	<p>Surface Water Management for the development is incorporated into the <i>Infrastructure Design Report</i> by DBFL Consulting Engineers.</p>
15.6.3	<p>Green / Blue Roofs</p> <p>Dublin City Council will require all new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23. Refer to Appendix 11 for further details.</p>	<p>Green / blue roofs provided for the development. Please refer to DBFL Consulting Engineers <i>Infrastructure Design Report</i> (Section 3.2.5) and relevant drawings. Green / Blue Roof provision exceeds DCC's minimum coverage of 70%.</p>
15.6.5	<p>Urban Greening</p> <p>All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green</p>	<p>The development includes tree planting, a large quantum of public and communal open spaces and green roofs in accordance with Section 15.6.5.</p>

	<p>walls etc. The provision of urban greening methods improves the overall quality of the environment and enhances the well-being in accordance with policy CA29 and G16.</p>	
<p>15.6.6</p>	<p>Sensitive Ecological Areas Sensitive ecological areas can include protected areas such as SPA's, SAC's and NHA's as well as areas with significant tree cover and vegetation capable of facilitating habitats, or any other landscaped area with quality natural environment or sensitive natural features. Regard to such areas must be made in any development proposal.</p> <p>Where a proposed development adjoins a sensitive ecological area such as a river or canal bank, the area adjacent to the waterway should be retained as a riparian corridor with linkages into the wider open space network. The maintenance of natural river banks shall be required, without physical or visual encroachment on watercourses. See also policy S10.</p> <p>The width of any linear park adjacent to a waterway should take into account the natural topography, existing layout and amenity potential with due allowance for riparian corridors and flood risk. In all cases, any existing blockages to permeability, such as boundaries or redundant buildings, should be resolved where possible. See Chapter 9, Section 9.5.2 and also policies S10, S11 and S12, and objectives SIO7 and SIO8 on River Restoration.</p> <p>Full public access to lands along waterways which are in private ownership as part of any development proposal should be provided unless exceptional circumstances prevail.</p>	<p>The site does not adjoin a river or canal bank. An <i>Appropriate Assessment Screening Report</i> has been prepared for the proposed development. This report has assessed and screened out any potential sources of significant adverse effects to EU sites as a result of the proposed development.</p> <p>In addition, an EIAR Biodiversity Chapter (Chapter 8) has been prepared for the application. This assessment includes consideration of potential impacts to species such as birds, bats, flora and other fauna and was informed by specialist surveys where applicable. Mitigation and enhancement measures have been recommended and detailed within said chapter; to address any potential impacts and enhance the biodiversity of the site compared to its current condition. Once these mitigation measures are followed in full, there will be no likely significant effects on any protected flora and fauna as a result of the proposed development.</p> <p>A <i>Biodiversity Enhancement Plan</i> has also been prepared detailing how the proposed development will incorporate and support biodiversity into the future.</p>

	<p>All of the main rivers in Dublin city have salmonid populations. Therefore, applicants should also demonstrate legal compliance to protect the watercourses and fisheries from soil, silt or other material during construction and in this regard should liaise with Inland Fisheries Ireland. As many protected species inhabit Dublin’s rivers, applicants should consult with the National Parks and Wildlife Service to inquire as to any consent procedures required for proposed works and to ensure that design layouts do not cause habitat loss. In the case of proposals adjacent to a canal, appropriate space should be retained for wildlife and it should also be ensured that wildlife have appropriate access to the water.</p> <p>Applicants should consult the Dublin City Council Biodiversity Action Plan 2021-2025 and the Dublin City Canals Plan (Waterways Ireland in conjunction with Dublin City Council, Fáilte Ireland and the Dublin Docklands Development Authority) to ascertain the implications of these plans for any such site. Regard should also be had to Planning for Watercourses in the Urban Environment Guidance (2020) produced by Inland Fisheries Ireland.</p>	
15.6.7	<p>Landscape Design Rationale</p> <p>Landscape design and maintenance plans will be regarded as an integral part of all development applications. The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications. Landscaping schemes must be in accordance with Dublin City Council standards for road and footpath layout, and there will be a preference for soft landscaping, where possible.</p>	<p>Proposed materials are indicated on the plans and in the <i>Landscape Design and Access Statement</i> and <i>Masterplan & Architectural Design Statement</i>. As part of the application, a specification has been provided outlining maintenance regimes. A <i>Landscape Management and Maintenance Plan</i> has also been prepared by Cameo and Partners as part of this planning application.</p>

	<p>Materials must be appropriate, durable and of a good quality. Careful consideration must be given to the design of hard-surfaced areas including streets, squares, open spaces, paved areas, footpaths and driveways. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design. Areas of schemes to be taken in charge by Dublin City should be designed with reference to the palette of materials used by the local authority to ensure later maintenance and replacement of materials in the upkeep of the area by the local authority. See also Appendix 5, Section 8.2 and 8.3.</p> <p>Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off consistent with sustainable development (see also Appendix 12 and 13).</p>	
15.6.8	<p>Landscape Plans and Design Reports</p> <p>Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report. A Landscape Design Report sets out the landscape strategy for the scheme through the use of drawings, illustrations and species specification documents. A landscape report should describe the public open space and communal open space provided within a scheme to demonstrate compliance with the relevant guidelines. Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans.</p>	<p>A <i>Landscape Design and Access Statement</i> is included as part of the planning application and details the proposed public and communal open spaces, boundary treatments, public realm improvements, materials, and the tree and planting strategy. The report also sets out the strategy for supporting biodiversity and habitats. A separate <i>Arboricultural Assessment</i> and a <i>Landscape Management and Maintenance Plan</i> have also provided.</p>

	<p>On sites with extensive vegetation and tree coverage, a separate tree report should also be incorporated into the landscape design report to support the retention of trees where possible. Landscape proposals should also take account of the biodiversity and environmental habitats present on the site and within the surrounding area and set out proposals to enhance and protect these features (see Sections 15.6.6, 15.6.9 and 15.6.10 for further details).</p> <p>Landscape design reports should address the following:</p> <ul style="list-style-type: none"> • The protection and incorporation of existing trees and landscape features worthy of retention. • The contribution of the proposed development to the landscape character and setting and open space amenity of the area. • The value of ecological corridors and habitats surrounding the proposed development and the potential impact on these areas. • The relationship between existing green corridors, public open spaces or area of high ecological values. • The detail and specifications for materials, finishes and maintenance details. • The integration of sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off – see Appendix 12 and 13. • The hierarchy of different types of planting throughout the development in order to give visual variety. Green roofs, walls and permeable surfaces 	
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	<p>will be encouraged and required in certain instances (see Chapter 10 and Appendix 11).</p> <ul style="list-style-type: none"> • The details of ecosystems services and biodiversity including pollinator friendly approach. • The maintenance and management strategy for the landscaped features. 	
15.6.9	<p>Trees and Hedgerows</p> <p>Dublin City Council will seek to protect existing trees and hedgerows when granting planning permission for developments and will seek to ensure maximum retention, preservation and management of important trees, groups of trees, and hedges as set out in Section 10.5.7 of the plan.</p> <p>Dublin City Council will encourage and promote tree planting in the planning and design of private and public developments. New tree planting should be planned, designed, sourced, planted and managed in accordance with 'BS 8545:2014 Trees: from nursery to independence in the landscape – Recommendations'. New planting proposals should take account of the context within which a tree is to be planted and plant appropriate tree species for the location.</p> <p>A tree survey must be submitted where there are trees within a proposed planning application site, or on land adjacent to an application site that could influence or be affected by the development. Information will be required on which trees are to be retained and on the means of protecting these trees during construction works. Where development is proposed, it is essential that existing trees are considered from the very earliest stages of design and</p>	<p>Tree protection and enhancement has been a key tenet of the proposed design. The trees that will be removed will be replaced by a significant number of large and medium size trees that will have a greater long-term benefit to local ecology and biodiversity. In particular 20 No. different species of trees will be planted in order to increase the biodiversity asset of the area. A significant number of large and medium size new generation trees will be provided at the site, and these will have a greater long-term benefit to local ecology and biodiversity. Pollinator friendly planting will be provided, including wildflower meadow, native trees and shrubs. The woodland will be enhanced by planting of native shrubs in the groundcover. Following the BS 8545:2014 all newly planted trees will be able to grow with vigour appropriate to the species and situation, in good health, to achieve the desired planting objectives.</p> <p>Tree Survey and Protection drawings have been prepared by CMK Arborists and are enclosed separately.</p>

	<p>prior to an application for planning permission being submitted. Root systems, stems and canopies, with allowance for future movement and growth, need to be taken into account in all projects.</p> <p>The following criteria shall be taken into account by Dublin City Council in assessing planning applications on sites where there are significant individual trees or groups/ lines of trees, in order to inform decisions either to protect and integrate trees into the scheme, or to permit their removal:</p> <ul style="list-style-type: none"> • Habitat/ecological value of the trees and their condition. • Uniqueness/rarity of species. • Contribution to any historical setting/ conservation area. • Significance of the trees in framing or defining views. • Visual and amenity contribution to streetscape. 	
15.6.10	<p>Tree Removal</p> <p>Where a proposal impacts on trees within the public realm, a revised design will need to be considered to avoid conflicts with street trees. Where a conflict is unavoidable and where a tree, located on-street, requires removal to facilitate a new development or widened vehicular entrance and cannot be conveniently relocated within the public domain, then when agreed by Parks Services and the Planning Department by way of condition to a grant of permission, a financial contribution will be required in lieu. The financial contribution is calculated by the Capital Asset Value for Amenity Trees (CAVAT) by an Arboriculturist. The</p>	<p><i>An Arboricultural Assessment</i> and drawings have been prepared by CMK Arborists. No trees are being removed in the public realm.</p>

	<p>payment is required to be lodged with Dublin City Council before the tree can be removed.</p>	
<p>15.6.12</p>	<p>Public Open Space and Recreation</p> <p>Public open space should be of high quality landscaped design to provide for an amenity value. Public open space should utilise a combination of hard and soft landscaping to cater for a wide range of needs such as children’s play, passive recreation and sporting facilities. Where adjacent to canals or rivers, proposals must take into account the functions of a riparian corridor and possible flood plain, see Section 10.5.5 Rivers and Canals and Section 9.5.2 on River Restoration.</p> <p>All applications which include areas of open space should refer to the Dublin City Council Parks Strategy 2017-2022 or any further iteration for guidance on the design and aspirations for city parks. Planning applications including any open space area (public or communal) should incorporate green infrastructure strategies including SuDs, flood management, biodiversity, outdoor recreation, connection and carbon absorption in accordance with Policy GI24 of the plan. See Section 10.5.4 and 15.8.6 for further details.</p> <p>In areas with a deficit of public open space in the city centre, SuDS proposals will be supported where it can be demonstrated that they have positive recreational and biodiversity functions. Any SuDS proposal that would negatively impinge on the conservation objectives of a historic park will not be supported.</p>	<p>The scheme proposes a large quantum of public and communal open spaces combining hard and soft landscaping, children’s play, passive recreation and fitness elements. The spaces have been designed in accordance with all relevant guidance. The scheme includes SuDs measures, biodiversity measures, outdoor recreation, connection and carbon absorption which ensures that a high-quality and sustainable development is provided.</p> <p>A response to each of the public open space requirements listed by Dublin City Council in Section 15.6.12 is provided as follows:</p> <ul style="list-style-type: none"> • The design and layout of each character area in the development is strongly connected to the other, collectively forming a network of interconnected amenity spaces. • All the proposed spaces will be overlooked. • In order to enhance visual permeability into the proposed public open space, to ensure natural surveillance and a safe environment for all, the proposals will remove a section of the existing rendered wall and replace it with a low wall and railings, to assist in reinforcing the perception of openness and a welcoming environment, whilst maintaining a physical boundary. All open spaces will be overlooked from the buildings. • All the spaces proposed are usable by all. • <i>Please refer to the Daylight and Sunlight Report for full details on the public and communal amenity space compliance.</i>

	<p>The planning authority will seek the provision of public open space in all residential schemes (see Section 15.8.6) and commercial developments in excess of 5,000 sq. m.</p> <p>Dublin City Council will seek the following in the delivery of public open space:</p> <ul style="list-style-type: none"> • The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout. • Open space should be overlooked and designed to ensure passive surveillance is achieved. • The space should be visible from and accessible to the maximum number of users. • Inaccessible or narrow unusable spaces will not be accepted. • The level of daylight and sunlight received within the space shall be in accordance with the BRE guidelines or any other supplementary guidance document – see Appendix 16. • Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks. • Protect and incorporate existing trees that are worthy of retention into the design of new open spaces. • Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity. • Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include 	<ul style="list-style-type: none"> • The Public Open Space has been proposed predominately along the areas where the existing trees are concentrated, which characterise the site. The scheme therefore maximises the natural features on site. • Existing trees on site informed and influenced the design team since the early days of the design process. In this regard, the northern and eastern woodland will be largely retained and incorporated into the public open space with no buildings proposed within this area. The existing tree belt along the western boundary will also be retained to provide an ecological buffer between the built-form and existing residential dwellings to the west. • The scheme incorporates existing mature planting and thus integrates existing natural features. • The proposed landscape setting aims to provide substantial benefit to the urban drainage due to the large permeable areas that will be provided on site such Green roof, rain gardens, permeable paving and on ground attenuation areas. For further information refer to DBFL Infrastructure Design Report. • The landscape scheme provides a planting concept with the following considerations: <ul style="list-style-type: none"> ○ Colour/size/texture/shape will enhance the attractive views of the site. ○ Strategically located trees to create focal points. ○ Different planting species for different character areas will emphasise the sense of space and the transition of the areas. ○ The site will also propose a tapestry of green roofs that will aim to increase the local biodiversity. ○ The large portion of planting area will help to reduce surface water run-off.
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	<p>associated biodiversity areas or wetlands which can reduce / better manage surface water run-off.</p> <ul style="list-style-type: none"> • Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12). • Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design. • Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible. • Age friendly measures should be incorporated into the design. • Permeability and accessibility for all users, particularly disabled persons should be provided. • Cycle and pedestrian friendly routes should be accommodated. 	<ul style="list-style-type: none"> ○ The planting species provided has been approved by the ecologist involved. Majority of the species will be low maintenance characteristics. It is envisioned that all planting of new vegetation will take place during construction in tandem with the construction of buildings; any trees or plants which, within a period of 5 years from the completion of the development, die, are removed, and that any which become seriously damaged or diseased are replaced in the next planting season. • The proposed materials will be appropriate and sympathetic to the local character of the area and be an integral part of the design. In addition to this also, the build-up of the paved area in the proximity of the retained trees will provide a specific build-up to ensure and guarantee the protection of the tree roots. Careful consideration has been given to the design, texture and colour of the materials of the streets, plaza, open spaces, paved areas, footpaths and driveways for example to ensure they will integrate with the design, which will assist in providing a high-quality living environment. • All the proposed street furniture within the development has been strategically located to create gathering and relaxing areas accessible for all. • A fitness trail will be proposed within the parkland in addition to many pathways throughout the site. The fitness equipment will be fully adequate for all ages.
15.6.13	<p>Boundary Treatments</p> <p>Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application. These shall include</p>	<p>Boundary treatments are explained and details are provided in the <i>Landscape Design and Access Statement</i> as part of the planning application.</p>

	<p>details in relation to proposed materials, finishes, and, in the case of planted boundaries, details in respect of species together with a planting schedule. In all instances, boundary treatments shall be of high quality, durable and attractive.</p>	
15.7	<p>Climate Action</p> <p>To mitigate against negative climatic impacts, all new developments will be required to demonstrate compliance with the climate action principles set out in Chapter 3 and as detailed below.</p>	<p>The scheme is in accordance with all relevant climate action principles as demonstrated throughout this Report.</p>
15.7.1	<p>Re-use of Existing Buildings</p> <p>Where development proposal comprises of existing buildings on the site, applicants are encouraged to reuse and repurpose the buildings for integration within the scheme, where possible in accordance with Policy CA6 and CA7. Where demolition is proposed, the applicant must submit a demolition justification report to set out the rationale for the demolition having regard to the 'embodied carbon' of existing structures and demonstrate that all options other than demolition, such as refurbishment, extension or retrofitting are not possible; as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures. Existing building materials should be incorporated and utilised in the new design proposals where feasible and a clear strategy for the reuse and disposal of the materials should be included where demolition is proposed.</p>	<p>A rationale for the demolition of the existing structures are included in the Appendix E of the <i>Masterplan & Architectural Design Statement</i>.</p> <p>An uncertain future for the building range was determined when their original function was permanently lost. In the absence of a corresponding compatible function, their wholesale re-use is architecturally and economically unviable.</p> <p>Consequently, the removal of certain buildings is proposed and a viable use will be generated in the refurbished Tabor House and Chapel as cultural / community spaces. The Chapel and Tabor House are to be retained as focal set pieces in the development, to enhance their reimagined continuance and securing their building fabric in the long-term.</p> <p><i>A Justification for Demolition Report</i> prepared by OCSC is enclosed separately, which considers the embodied carbon of the existing structures.</p>

<p>15.7.2</p>	<p>District Heating</p> <p>District heating systems will be supported in areas identified in Chapter 3: Climate Action. In these areas, all applications should be designed to cater for district heating systems. The details of the heating system proposed and compatibility with the district heating network should be specified in all planning applications. Applicants are requested to submit a Climate Action and Energy Statement with all planning applications in this zone – see below.</p> <p>Where district heating systems are not yet in operation, the applicant is required to demonstrate how the proposed heating system of the development can connect and facilitate future use of the district heating system once in place, see policy CA15, CA16, CA17 and CA18 for further information.</p>	<p>Due to local constraints, district heating was not considered a viable option.</p>
<p>15.7.3</p>	<p>Climate Action and Energy Statement</p> <p>In order to comply with the policies set out in Section 3.5.2 'The Built Environment' and Section 3.5.3 'Energy' of Chapter 3, proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.</p> <p>The purpose of this statement is to demonstrate how low carbon energy and heating solutions have been considered as part of the overall design and planning of the proposed development. Having regard to the above, the statement,</p>	<p>An <i>Energy & Sustainability Report</i> prepared by OCSC is enclosed with this planning application alongside Chapter 12 of the EIAR which considers any impacts of the proposed development to Air Quality & Climate.</p>

	<p>which shall be prepared by a certified engineer, shall address:</p> <ul style="list-style-type: none"> • the technical, environmental and economic feasibility of on-site renewable energy generation including solar PV and small scale wind power; • the technical, environmental and economic feasibility of at a minimum, the following high-efficiency alternative energy supply and heating systems: • decentralised energy supply systems based on energy from renewable and waste heat sources; • co-generation (combined heat and power); • district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources; • heat pumps; • include an assessment of embodied energy impacts. 	
15.8.1	<p>Quality/Making Sustainable Neighbourhoods</p> <p>Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including 'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads</p>	<p>The proposed development has regard to and follows the principles set out on the referenced guidelines. See <i>Masterplan & Architectural Design Statement</i> for details.</p> <p>Section 6.0 of this Report has responded to these policy documents, where relevant, and the <i>Traffic and Transportation Assessment</i> has considered the relevant NTA guidelines.</p>

	<p>and Streets (2019) and Design Manual for Quality Housing (2022).</p>	
<p>15.8.2</p>	<p>Community and Social Audit Applications for large residential developments or mixed use developments should include provision for community type uses. All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Each of the subsections below shall be assessed as part of the community and social audit.</p> <p>A community and social audit should address the following:</p> <ul style="list-style-type: none"> • Identify the existing community and social provision in the surrounding area covering a 750m radius. • Assess the overall need in terms of necessity, deficiency, and opportunities to share/ enhance existing facilities based on current and proposed population projections. • Justify the inclusion or exclusion of a community facility as part of the proposed development having regard to the findings of the audit. <p>Where it is determined that new facilities are required the following design criteria should be considered:</p> <ul style="list-style-type: none"> • The design of the facility should allow for multi-functional use. 	<p>A <i>Community and Social Infrastructure Audit (incl. Schools and Childcare)</i> has been prepared by Thornton O'Connor Town Planning which concludes:</p> <p><i>"The Study Area is particularly well served in terms of healthcare provision, faith infrastructure, and retailing amenities.</i></p> <p><i>Overall, healthcare, sports and recreation, community, education, and other facilities are all well-represented within the area and cater for the existing and proposed new residential community."</i></p> <p>Cultural/community space is proposed as part of the proposed development which will contribute positively to the current provision in the local area. The specific use and layout of these community/cultural spaces will be agreed with Dublin City Council via compliance post-planning. Please refer to the <i>Cultural Infrastructure Assessment</i> prepared by Turley for full details.</p>

	<ul style="list-style-type: none"> • Community facilities must be located so that they are conveniently accessible by both residents and others who may have reason to use the facility. • Community facilities should be well integrated with pedestrian and cycle routes and, where they serve a wider community, located on or close to a quality public transport route. • Re-development proposals on sites containing a pre-existing community use / and / or recreational use should ensure that this use in terms of floor / ground space is no less than that on-site prior to redevelopment, and if possible, should represent increased provision. • Community facilities must be accessible to all members of society including persons with disabilities and the elderly. 	
15.8.3	<p>Schools</p> <p>In accordance with the requirements for social and community audit, planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand. In the case of very large-scale developments (800+ units), the phased completion of the dwellings must be linked with the provision of new schools.</p>	<p>A schools assessment forms part of the <i>Community and Social Infrastructure Audit (incl. Schools and Childcare)</i> prepared by Thornton O'Connor Town Planning, which concludes that the schools in the surrounding area are considered sufficient to serve the development.</p>
15.8.4	<p>In order to meet this objective, one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be provided in all new mixed use and residential schemes.</p>	<p>The proposed development includes a c. 375 sq m creche which will cater for 75 No. children. We note that the <i>Community and Social Infrastructure Audit (incl. Schools and Childcare)</i> concludes:</p> <p><i>“While a current shortage in childcare spaces was identified in the childcare survey, it is expected that the granted pipeline of new</i></p>

	<p>As part of the community and social audit, an assessment of the childcare facilities in the surrounding 1km radius of the proposed should be included. The analysis should have regard to:</p> <ul style="list-style-type: none"> • The make-up of the proposed residential area, i.e. an estimate of the mix of community that the housing area seeks to accommodate (if an assumption is made that 50 % approximately of the housing area will require childcare, how does the proposal contribute to the existing demand in the area). • The number of childcare facilities within walking distance (i.e. 1km) of the proposal. • The capacity of each childcare facility and the available capacity by completion of the project. • The results of any childcare needs analysis carried out as part of the city childcare strategy or carried out as part of a local or area action plan or as part of the development plan in consultation with the city childcare committees, which will have identified areas already well served or alternatively, gap areas where there is under provision, will also contribute to refining the base figure. <p>Childcare facilities should also be located in existing residential areas, business/technology parks, industrial estates, areas of employment and within office blocks, with such provision being established having regard to the Dublin City Childcare Committee audit and needs analysis (for full details, see Childcare Facilities, Guidelines for Planning Authorities 2001).</p>	<p><i>childcare facilities, will address this shortfall into the future, alongside the childcare facility proposed as part of this scheme."</i></p> <p>The Applicant has incorporated a crèche into the scheme, which as well as benefiting the future residents of the development, it will also cater for the immediate existing residents of the area and thus will greatly enhance the amenity of the area.</p>
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<p>15.8.4.1</p>	<p>Design Criteria</p> <p>All childcare facilities are required to provide private outdoor play space or demonstrate safe and easy access to a safe outdoor play area. Such outdoor space should be appropriately located to be protected from air pollution – see objective QHSNO19.</p> <p>The internal design, layout and size of the childcare facility shall be in accordance with the standards set out in the Childcare Facilities, Guidelines for Planning Authorities 2001.</p> <p>Safe and secure access should also be provided in terms of pedestrian and cycle movements in association with public transport services in the area. Associated vehicular drop off will also be required in certain locations. This should be accompanied by a traffic and transport assessment which sets out the need to accommodate vehicular movements.</p>	<p>The proposed creche has an outdoor space of 244 sq m. The internal design is in accordance with the 2001 Guidelines. Some 3 No. car parking spaces are also designated for the creche. It is expected that the creche will predominately serve the future residents in the development and the surrounding local community and thus the majority of people will walk or cycle to the facility.</p>
<p>15.8.5</p>	<p>Public Realm</p> <p>All residential developments that include lands within the public realm must agree, subject to a letter of consent, with the planning authority that the proposed scheme is compliant with the public realm guidance as set out on the Dublin City Council website. https://www.dublincity.ie/residential/planning/strategic-planning/public-realm-strategy</p> <p>Details of road widths, public footpaths and accessibility can be found in Appendix 5 of the plan.</p>	<p>A letter of consent has been received from Dublin City Council for the LRD Application facilitating the proposed works to Milltown Road, Sandford Road and Eglinton Road.</p>

	<p>Where new public spaces that will contribute to the public realm of an area are proposed, applicants must demonstrate that such spaces provide accessibility to all, are easy to navigate and create safe and secure environments. Please see guidance on street furniture, public lighting and accessibility in this regard as set out in Section 15.17.</p>	
<p>15.8.6</p>	<p>Public Open space All residential development is required to provide for public open space. Regard should be had to the guidance set out in Section 15.6.12 above regarding landscaping requirements, and also Section 15.6 on Green Infrastructure.</p> <p>The public open space requirement for residential developments shall be 10% of the overall site area as public open space.</p> <p>In the case of residential developments on Z12 and Z15 zoned lands, additional open space is required in order to retain the existing open character of the lands. A total of 25% public open space will be required within these zones.</p>	<p>The proposed development has public open space of 35.3% (25.6% located in the public park and plaza). As detailed in the <i>Landscape Design and Access Statement</i> and this Report, the public open space provision will be a significant benefit for the local community.</p>
<p>15.8.10</p>	<p>Gated Communities</p> <p>Dublin City Council will resist gated communities within the city and there is a general presumption against same in order to promote permeability and accessibility in the urban area. Where a gated scheme is proposed, the applicant must demonstrate the operational management strategy for the development and clearly set out the functionality of the gate mechanism proposed. The</p>	<p>The development will not be gated, except for the vehicular access to the car park to management parking spaces and the communal open space which only residents will be able to access. The public and residents can easily access their home, the open spaces or the creche and community / cultural spaces provided.</p> <p>The new access gate situated on corner of Milltown Road and Sandford Road will be self-closing to ensure safety for children within the proposed play area and adjacent to the road. The gate will return to the</p>

	<p>ongoing management and maintenance of the development will need to be demonstrated to avoid any situations where the mechanism malfunctions.</p> <p>The applicant will also be required to demonstrate how the gate will function in respect of traffic movements and the potential wait time on the public road. Sufficient car parking will also need to be provided in order to prevent overspill car parking onto the public road.</p>	<p>closed position after use preserving the integrity of the perimeter and prevents slamming and trapped fingers. In addition a magnetic lock will be introduced to ensure only adult pressure will be applied in order to open the gate. While the development will generally be fully accessible by the local community 24/7, the north-eastern gate will be locked at night to ensure no anti-social behavior occurs.</p> <p>The residential communal spaces will be gated for resident access only, allowing a balance between enclosure and exposure.</p> <p>The development provides a good balance between providing easily accessible public open spaces in addition to some gated communal spaces for resident use.</p>
15.9.1	<p>Unit Mix</p> <p>Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> <p>As part of the preparatory research for this Plan, alongside the preparation of a HNDA for the city, two sub areas were identified for sub-city level HNDA analysis; (i) the Liberties and (ii) the North Inner City.</p> <p>The following requirement for unit mix are, therefore, required in these two sub-city areas; (i) the Liberties and (ii)</p>	<p>The subject site falls outside of the 'sub-city' areas of 'Liberties' and 'North Inner City', and thus SPPR 1 applies to the development. We note that the recent updates to the <i>Apartment Guidelines</i> in July 2025 amended SPPR 1 whereby there are no restrictions on the mix of units in apartment schemes if it is not a social housing scheme or scheme specifically for older people.</p> <p>Nevertheless, the proposed development still seeks to provide the following mix of units, having regard to SPPR 1 of the 2023 <i>Apartment Guidelines</i>:</p> <ul style="list-style-type: none"> • 70 No. studios (12%) • 176 No. 1-bed units (31%) • 267 No. 2-bed units (48%) • 49 No. 3-bed units (9%) <p>In relation to just the apartment units, the following mix is provided:</p> <ul style="list-style-type: none"> • 70 No. studios (12%)

	<p>the North Inner City. SPPR₁ is applicable to the remainder of the Dublin City Council administrative area: To require planning applications that include residential accommodation of 15 residential units for more in the North Inner City and Liberties Sub-City Areas (as per Figure 1.2 as part of Appendix 01, Annex 3) include the following mix of units:</p> <ul style="list-style-type: none"> • A minimum of 15% three or more bedroom units. • A maximum of 25%-30% one bedroom / studio units. <p>Please review the full Section 15.9.1 if site located in these areas.</p>	<ul style="list-style-type: none"> • 176 No. 1-bed units (32%) • 267 No. 2-bed units (48%) • 43 No. 3-bed units (8%) 															
15.9.2	<p>Unit Size / Layout</p> <p>Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments. The minimum standards for apartments, as set out in the guidelines are as follows:</p> <p>Table 15-5: Minimum Floor Area Requirements for Apartments</p> <table border="1" data-bbox="452 1018 1146 1233"> <thead> <tr> <th>Unit Type</th> <th>Bedspace</th> <th>Floor Area Requirement (min)</th> </tr> </thead> <tbody> <tr> <td>Studio</td> <td>1 bedspace</td> <td>37 sq. m.</td> </tr> <tr> <td>1 bed</td> <td>2 bedspaces</td> <td>45 sq. m.</td> </tr> <tr> <td>2 bed</td> <td>4 bedspaces</td> <td>73 sq. m.</td> </tr> <tr> <td>3 bed</td> <td>5 bedspaces</td> <td>90 sq. m.</td> </tr> </tbody> </table> <p>The introduction of a 2 bedroom, 3 person unit may be considered within a scheme to satisfy specialist housing for Part V social housing requirement or to facilitate</p>	Unit Type	Bedspace	Floor Area Requirement (min)	Studio	1 bedspace	37 sq. m.	1 bed	2 bedspaces	45 sq. m.	2 bed	4 bedspaces	73 sq. m.	3 bed	5 bedspaces	90 sq. m.	<p>The unit size layout and floor areas all comply with the standards.</p> <p>The proposed development comprises studio units and 1-bed units which do not exceed 50% of the total provision. In addition, 2-bed, 3-person units do not exceed 10% of the total mix.</p> <p>The scheme provides 278 No. oversized apartment units which represents 50% of the overall unit provision. Of these oversized units, some 139 No. units are designed to be universal design (25% of the total apartment units provided). Please see <i>Masterplan & Architectural Design Statement</i>, the detailed units plans, the Housing Quality Assessment and Schedule of Accommodation prepared by OMP Architects for details.</p>
Unit Type	Bedspace	Floor Area Requirement (min)															
Studio	1 bedspace	37 sq. m.															
1 bed	2 bedspaces	45 sq. m.															
2 bed	4 bedspaces	73 sq. m.															
3 bed	5 bedspaces	90 sq. m.															

	<p>appropriate accommodation for older people and care assistance.</p> <p>These units will be restricted to a maximum of 10% of the overall unit mix. The 2 bedroom, 3 person unit will only be considered as part of specialist housing provision as specified above and will not be considered as standard residential accommodation.</p> <p>The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%). In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people, people living with dementia and people with disabilities.</p> <p>For larger dwellings, the provision of one main living room separate from a combined kitchen/dining area should be considered.</p> <p>The needs of children must be considered in the design of the unit and this includes play areas, storage for play equipment, bathrooms big enough to bath a child, study areas, etc.</p>	
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<p>15.9.3</p>	<p>Dual Aspect</p> <p>Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations.</p> <p>Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate.</p> <p>In prime city centre locations, adjoining or adjacent to high quality, high frequency public transport, 33% dual aspect may be accepted in locations where there are specific site constraints such as tight urban infill sites up to 0.25ha or where there is a need to maintain a strong street frontage. In the outer city (beyond the canal ring) and within the SDRA's, schemes with a minimum of 33% dual aspects units will only be considered in exceptional circumstances.</p> <p>Where single aspect is proposed, the number of south facing units should be maximised. East and west facing units are also considered acceptable. The living spaces in these units should be situated with the most preferable orientation for maximum access to direct sunlight. North facing units will only be considered where they face an area of high amenity value such as a public park, water body or another significant view of interest. For clarity, north facing units are units which predominantly face north (i.e. over 50% of the façade). North east and north west units are defined as units that fall within a 45 degree angle of due</p>	<p>The proposed development has 51% dual aspect units (281 No. apartments in total). Please see the <i>Masterplan & Architectural Design Statement</i> and the Housing Quality Assessment prepared by OMP Architects for details.</p> <p>We note that the 2025 <i>Apartment Guidelines</i> amended the SPRR associated with minimum number of dual aspect units. In this regard, SPPR 3 now requires a minimum of 25% of units within apartment schemes to be dual aspect. The proposed scheme exceeds the updated requirements as well as SPPR 4 of the 2023 <i>Apartment Guidelines</i> minimum requirement of 33% for sites located in central and accessible locations and 50% for sites in suburban or intermediate locations.</p>
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	north. This unit configuration will be considered in limited circumstances on a case by case basis.	
15.9.4	<p>Floor to Ceiling Height</p> <p>SPPR 5 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) set out the requirements for minimum floor to ceiling heights.</p> <p>A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided. Where commercial units are proposed or where flexibility for adaptation to alternative uses is required at ground floor level, a floor to ceiling height of 3.5m to 4m shall be applied. This will be assessed on a case by case basis.</p>	The minimum floor to ceiling heights are complied with in the proposed development.
15.9.5	<p>Lift, Stair Cores and Entrance Lobbies</p> <p>Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.</p>	The proposed development complies with building regulations by providing 12 No. apartments per floor per core (or less).
15.9.6	<p>Internal Storage</p> <p>Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable</p>	Internal storage is provided in all units and meets the minimum requirements.

	<p>Urban Housing: Design Standards for New Apartments (2020) for details.</p> <p>Flexibility shall be provided in certain circumstances on a case by case basis.</p>	
15.9.7	<p>Private Amenity Space</p> <p>Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p> <p>At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.</p>	<p>All units have private outdoor amenity space in accordance with the standards.</p>
15.9.8	<p>Communal Amenity Space</p> <p>Communal amenity space must be clearly defined and distinguished within a scheme and clearly identified as part of any planning application. The communal amenity areas should be of high landscape quality and provide for adequate daylight and sunlight access throughout the year. The communal amenity area should be functional and usable to a range of activities including, children's play (see</p>	<p>Communal amenity space is provided for in the proposed development and it is passively overlooked by residents and the spaces will also be safe for children. The spaces will include suitable landscaping and planting to provide a high quality environment. These spaces will be gated/restricted for resident access only, allowing a balance between enclosure and exposure.</p> <p>The scheme provides well in excess of the communal open space requirement based on the unit mix (3,362 sq m required and 4,423 sq m provided). The open spaces will have generally good sunlight</p>

	<p>Section 15.8.8 for further details), passive recreation and leisurely activities such as games and exercise.</p> <p>Communal amenity space should be located in areas that are overlooked and passively supervised. Where ground floor balconies/terraces bound directly onto communal spaces the use of a separation strip of low level planting between the two areas will be encouraged. Regard must also be had to future maintenance of amenity spaces in order to ensure that this is commensurate with the scale of development and does not become a burden on residents. On refurbishment or infill sites of up to 0.25 ha, the communal amenity requirements may be relaxed on a case by case basis.</p> <p>Development proposals shall demonstrate that the communal open space:</p> <ul style="list-style-type: none"> • Complies with the minimum standards based on each individual unit. • Will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics. • Is secure for residents and benefits from passive surveillance. • Considers the needs of children in particular in terms of safety and supervision and is fully accessible to all. • Achieves good sunlight penetration – see Appendix 16. • Has appropriate arrangements for maintenance and management such as a conveniently accessed 	<p>penetration and all spaces meet the relevant guidelines. Water and drainage connections can be provided for the open spaces.</p>
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	garden maintenance and storage area with water and drainage connections.	
15.9.9	<p>Roof Terraces</p> <p>Roof terraces may be provided in certain circumstances subject to an assessment of accessibility, safety and micro-climatic impacts. Roof terraces will not be permitted as the primary form of communal amenity space but may contribute to a combination of courtyard and or linear green space. The provision of roof terraces does not circumvent the need to provide an adequate accessible ground floor residential amenity that achieves adequate sunlight and daylight levels throughout the day unless exceptional site specific conditions prevail.</p> <p>It must be demonstrated that roof terraces are suitable for the intended use in terms of wind comfort levels, daylight and sunlight, noise impacts and safe and secure accessibility for all users, particularly children. Roof terraces must also accommodate landscaping features such as tree planning, shrubs and outdoor seating in order to create a quality green environment. Any such planting should be of species which can thrive in low soil depth planters and when exposed to wind conditions. How such roof terraces are to be maintained and managed must also be demonstrated. See also Appendix 11 for guidance on green roofs.</p>	<p>There is a roof terrace proposed as communal amenity space (109 sq m) at sixth floor level of Block A1. Please see the <i>Masterplan & Architectural Design Statement</i> for details. It has been demonstrated that the spaces are suitable in terms of wind, daylight and sunlight and noise. All open space will be appropriately landscaped and managed by the Property Management.</p>
15.9.10	<p>Internal Communal Facilities</p> <p>Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for</p>	<p>The proposed development includes a co-working space and a gym in Block C and a management suite in Block B for use of residents. The community/ cultural spaces will be open to the public but may also be open to use by residents subject to final use as agreed with Dublin City</p>

	<p>use by residents. These facilities include laundry rooms, community or meeting rooms, management offices, co – working spaces etc. Other uses such as gyms or co-working spaces can also be provided and available to non-resident users also. The range of uses proposed should be discussed with the planning authority at pre application stage.</p>	<p>Council post-planning. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>
15.9.11	<p>Security</p> <p>New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security.</p> <p>The location of entrance doors and lobbies should be located in highly visible areas of the building and should be well lit and overlooked.</p> <p>Ground floor level apartments should be provided with a privacy strip of approximately 1.5m in order to maintain adequate security and privacy within the unit.</p>	<p>The development incorporates safe and secure design principles as all common/public areas are overlooked. The amenity and community /cultural activity at ground floor and the apartments will ensure that these areas have natural passive surveillance. Please see the <i>Masterplan & Architectural Design Statement</i> for details.</p>
15.9.12	<p>Access and Services</p> <p>Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly. Internally within a scheme, access to each individual unit should be clearly identified and well lit through natural light where feasible.</p>	<p>All accesses have been clearly identified in the application documents and will be suitable for all users.</p>

	<p>Service ducts should be easily accessible from common circulation area to facilitate maintenance.</p>	
15.9.13	<p>Refuse Storage</p> <p>Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the projected level of waste generation, types and quantities.</p> <p>All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan that clearly identifies the projected quantities of waste and the proposed waste collection strategy. Refer to Appendix 7 and Policy SI29 and SI30 for further details.</p>	<p>Refuse storage is provided at ground level and basement for all uses provided in the development. They are easily accessible near lift/stair cores. An Operational Waste Management Plan has been prepared by AWN Consulting and is enclosed as an Appendix to the EIAR.</p>
15.9.14	<p>Lifecycle Reports</p> <p>All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p> <p>The lifecycle report should include an assessment of the materials and finishes proposed, the ongoing management strategy, the protocol for maintenance and repair, the long term maintenance costs for residents and the specific measures that have been taken to effectively manage and reduce the costs for the benefit of residents.</p> <p>The reports should address each of the following headings:</p> <ul style="list-style-type: none"> o Assessment of Long Term Running and Maintenance Costs 	<p>A <i>Building Lifecycle Report</i> has been prepared by Aramark and is enclosed separately.</p>

	<ul style="list-style-type: none"> o Property / Owner Management Company and Common Areas o Service Charge Budget o Measures to Manage and Reduce Costs o Treatment, Materials and Finishes o Construction Methodology o Material Specification o Landscaping o Waste Management o Human Health and Well –being o Residential Management o Energy and Carbon Emissions o Transport and Accessibility <p>Compliance and acknowledgement of the provisions set out in the Multi-Unit Developments Act 2011 for the ownership and management of multi- unit developments should also be included.</p>	
15.9.15	<p>Operational Management and Maintenance</p> <p>Service ducts serving two or more apartments should as far as practicable be accessible from common circulation areas to facilitate easy maintenance. The running of services overhead, particularly above the ceiling of a different unit should be avoided. To prevent demands for the installation of numerous individual satellite dishes on visible parts of the façades or roof of apartment buildings, provision should be made for locating communal or individual dishes on less visible parts of the building, such as at roof level. Ideally larger schemes will provide space for maintenance facilities such as a management room, maintenance store(s) and in</p>	<p><i>A Property Management Strategy Report</i> has been prepared by Aramark and is enclosed separately.</p>

	<p>some circumstances accommodation for a caretaker should be included.</p> <p>All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p> <p>These plans will assist the planning authority in considering the long term contribution of the development and the strategy and objectives for the maintenance and operation of the development.</p>	
15.9.16	<p>Microclimate – Daylight and Sunlight, Wind and Noise</p> <p>All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.</p>	<p>The following reports/EIAR Chapters are included as part of this planning application:</p> <ul style="list-style-type: none"> • Microclimate-Wind (Chapter 17) by OCSC. • Noise and Vibration (Chapter 13) by AWN Consulting. • Daylight and Sunlight Assessment Report by 3D Design Bureau (plus Appendix 5.1 of the EIAR).
15.9.16.1	<p>Daylight and Sunlight</p> <p>A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>	<p><i>A Daylight and Sunlight Assessment Report</i> has been prepared by 3D Design Bureau and is enclosed separately, in addition to Appendix 5.1 which contains a Review of the BRE Sunlight and Daylight Assessment.</p>

	<p>A best practice guide for the assessment and methodology of Daylight and Sunlight Assessments is set out in Appendix 16.</p>	
15.9.16.2	<p>Wind</p> <p>A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme.</p> <p>The Lawson Comfort Criteria sets out an appropriate pedestrian comfort levels in a given space based on suitability for pedestrian activities. The purpose of the assessment is to clarify that the intended use of a space is suitable and to identify mitigation measures required (if any). All areas within a development should be at a satisfactory level to ensure maximum comfort levels for all users.</p>	<p>A Microclimate-Wind chapter (Chapter 17 of the EIAR) has been prepared by OCSC in addition to a <i>Pedestrian Wind Comfort Study</i> Report enclosed separately.</p>
15.9.16.3	<p>Noise</p> <p>All apartment developments should be designed as to ensure noise transmission between units and from external or internal communal areas is minimised. Guidance for noise reduction in building is set out in BS 8233:2014.</p> <p>The following principles are recommended for minimising disruption from noise in dwellings:</p>	<p>Chapter 13 of the EIAR (Noise and Vibration) prepared by Awn Consulting considers the points raised in Section 15.9.16.3.</p>

	<ul style="list-style-type: none"> • Utilise the site and building layout to maximise acoustic privacy by providing good building separation within the development and appropriate noise insulation measures to reduce noise transfer and vibration to neighbouring buildings and noise sources. • Arrange units within the development and the internal layout to minimise noise transmission by locating busy, noisy areas next to each other and quieter areas next to quiet areas. • Keep stairs, lifts, and service and circulation areas away from noise sensitive rooms like bedrooms. Particular attention should be paid to the siting and acoustic isolation of the lift motor room. <p>Proposals close to noisy places, such as busy streets / railway lines, may need a noise impact assessment and mitigation plan. (Noise maps and Noise Action Plan are available at www.dublincity.ie).</p> <p>Please also refer to Section 15.18.9 – Noise which provides details on areas of the city with greater potential to be affected by noise given proximity to critical infrastructure such as Dublin Airport.</p>	
15.9.17	<p>Separation Distances (Apartments)</p> <p>Traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable.</p>	<p>A key priority throughout the detailed design stage of the development was to provide sufficient setbacks and appropriate transitions from the residential properties along Cherryfield Avenue Upper and Lower along the western boundary and from the residential properties along Norwood Park to the north. The western boundary is made up of modest 2 No. storey houses and the 3 No. storey element of Block D (height ranges from 3 No. to 5 No. storeys), which highlight that the proposed development has appropriately considered the transition</p>

	<p>Separation distances between buildings will be assessed on a case by case basis.</p> <p>In all instances where the minimum separation distances are not met, each development will be assessed on a case by case basis having regard to the specific site constraints and the ability to comply with other standards set out within this chapter in terms of residential quality and amenity.</p>	<p>between the development and surrounding properties of Cherryfield Avenue Upper and Lower.</p> <p>Large setbacks of between c. 32.5 metres and c. 50 metres have been provided between the Norwood Park dwellings and Block C which ranges in height between 4 No. and 7 No. storeys, with the height of the building being 4 No. and 5 No. storeys at the closest points to the neighbouring dwellings.</p> <p>Block F to the south of the site ranges in height from 5 No. to 7 No. storeys and has been set back from the retained Jesuit lands.</p> <p>The scheme then transitions in height along the eastern boundary with Block A1 ranging in height from part 5 No. to part 8 No. storeys and Block A2 ranging in height from part 6 to part 8 No. storeys. Blocks A1 & A2 (8 No. storey element) will improve legibility and wayfinding for the wider area and internally within the site.</p> <p>It is clear that the Design Team has comprehensively considered the height of the blocks within the proposed development and their separation distances to surrounding properties as the modulation of height throughout the site responds to the situational context of each block within the site.</p>
15.9.18	<p>Overlooking and Overbearance</p> <p>'Overbearance' in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home. In established residential developments, any significant changes to established context must be considered. Relocation or reduction in</p>	<p>The form and massing of the design has been carefully considered to minimise overlooking and overbearance. The predominant linear arrangement of the blocks assists with breaking down the massing of the development which ensures that the development will not be excessive or overbearing. The large open spaces provided will also contribute towards the breaking down of the perceived massing. In this regard, 35.3% of the developable site will be public open space and 10% of the site will be surface level communal open space. Therefore, 45.7% of the developable site will comprise open which is a significant</p>

	<p>building bulk and height may be considered as measures to ameliorate overbearance.</p> <p>Overlooking may be overcome by a variety of design tools, such as:</p> <ul style="list-style-type: none"> • Building configurations (bulk and massing). • Elevational design / window placement. • Using oblique windows. • Using architectural features. • Landscape and boundary treatments. 	<p>quantum of space that will benefit the public / community and demonstrates that the development will not be excessive.</p>
<p>15.14.5</p>	<p>Co-Working Spaces Co-working spaces are e-working hubs that enable a range of users to work independently in a collective space. Co-working spaces should provide for independent pods for individual e-working as well as larger meeting rooms and communal areas including food and beverage facilities to cater for all users.</p> <p>Co-working spaces should ensure a high level of interaction at street level and avoid the use of screens / glazing manifestations where possible.</p> <p>Communal cycle storage and associated facilities should be provided in accordance with requirements for office developments, Appendix 5 for further details.</p> <p>Co-Working spaces should be located in city centre areas, key urban villages or in urban villages/neighbourhood centres in line with the 15 minutes city objective. The use of co-working spaces for community groups is also supported for local meeting, further education etc.</p>	<p>The proposed co-working space is intended to serve the future residents and represents an alternative to their working from home routine if applicable. The proposed gym will cater for residents of the development looking to work-out, conveniently located at their doorstep. It is not considered necessary to provide showering facilities as the scheme is intended to be utilised by the residents living in the development.</p>

<p>15.14.7.2</p>	<p>Restaurants/Cafes</p> <p>In considering applications for restaurants, the following will be taken into consideration:</p> <ul style="list-style-type: none"> • The effect of noise, general disturbance, hours of operation and fumes on the amenities of nearby residents. • Traffic considerations. • Waste storage facilities. • Hours of operation. • The number/frequency of restaurants and other retail services in the area. • The contribution to the vitality and viability of the area. <p>For proposals relating to outdoor dining, applicants will be required to demonstrate whether temporary or permanent outdoor dining facilities are provided. These areas should be fully contained within the site boundary. Temporary dining should ensure all fixtures and fittings are fully removable outside operating hours and should not impede access or create undue clutter or trip hazard in the streetscape.</p> <p>Permanent structures should be included in all plans and elevations submitted with the application. Details of ventilation and heating of the area will also be required.</p>	<p>A café/restaurant is proposed at the ground floor of Block F and faces out towards the forecourt area in front of Tabor House and adjacent to the entrance to the site along Milltown Road. A café/restaurant was considered to be an appropriate use to provide at the subject site given its social contribution that it would offer, its high level of foot fall to the site, and the introduction of jobs to the area.</p> <p>As part of the development, the following reports and assessment have been prepared:</p> <ul style="list-style-type: none"> • Operational Waste Management Plan (Appendix of EIAR); • Noise & Vibration Chapter of the EIAR; • Traffic and Transportation Assessment; • Transportation Chapter in the EIAR; • Mobility Management Plan; • Property Management Strategy; <p>These include details on the noise, ventilation, management, traffic, and waste of the proposed café/restaurant.</p> <p>Furthermore, Section 3.0 of this Report provides a list of all of the café/restaurants and other retail services in the local area.</p> <p>The final layout of the café/restaurant will be agreed with Dublin City Council once an end-user is identified post-planning, similar to the cultural/community space.</p>
<p>15.14.7.4</p>	<p>Noise, Odour, Ventilation for Restaurant / Café / Take-Away</p> <p>Café, restaurant and take away uses should be designed having regard to the appropriate noise and ventilation guidelines. All ventilation proposals should avoid direct</p>	<p>Please refer to the Noise & Vibration Chapter of the EIAR for details of any noise associated with the café/restaurant.</p> <p>OCSC have advised us that the general supply and extract ventilation for the café/restaurant will be facilitated by way of a louvred band on</p>

	<p>extracts at street level, where possible. Where extract odour and ventilation is required on main street frontages, careful design solutions should be provided to extract does not interfere with pedestrians and road users in terms of noise and odour. Similarly, noise associated with the use of a café / restaurant / take away should be minimised as to ensure no overspill to street level occurs. Café and restaurant proposals should include an engineering statement to address, noise, ventilation and odour as part of any planning applications.</p>	<p>the façade perimeter of these premises. This louvred band will allow for intake and exhaust ducts to connect into the back of the spandrel panel behind the louvre. The intake and exhaust ducts will be interconnected with ceiling mounted Heat Recovery Ventilation Units which contain filters, heat exchangers, fans, dampers, heating coils, etc. to temper the incoming air and supply fresh filtered air to the occupied spaces whilst extracting stale warmer air and exhausting through the HRU to atmosphere. This is a very common, energy efficient, and effective ventilation strategy for premises of this nature.</p> <p>If there is heavy cooking uses required in the kitchen then there is a dedicated extract riser provided to roof level to exhaust cooking odours to avoid nuisance smells.</p>
15.15.1.3	<p>Best Practice</p> <p>All archaeological reports submitted with a planning application and/or prepared in compliance with planning permission shall be produced in accordance with Excavation Reports Guidelines for Authors, (NMS, 2006).</p>	<p>As advised by Archer Heritage Planning, Chapter 6 of the EIA and all submitted reports (EIA Appendices) were produced in accordance with the Guidelines.</p>
15.15.1.7	<p>Archaeological Excavation</p> <p>When planning permission for development involving sub-surface excavation is granted, the applicant's attention will be drawn to the legal obligation to report the discovery of archaeological finds to the National Museum of Ireland.</p>	<p>It is recommended that development works will be monitored by a suitably qualified archaeologist, ensuring appropriate reporting of archaeological objects and sites/features to the statutory heritage bodies.</p>
15.15.1.8	<p>Archaeological Mitigation</p> <p>Where a site has tested positive for archaeology, in situ remains shall be evaluated for preservation in situ. In situ medieval structures shall be carefully evaluated with the aim of preservation and presentation in situ within the new</p>	<p>The site tested negative for archaeology.</p>

	<p>development. Where preservation in situ is not feasible, sites of archaeological and/or industrial heritage interest shall be subject to a full archaeological excavation and post excavation analysis according to best practice in advance of redevelopment. Where an excavation is the agreed mitigation strategy the licenced archaeological director shall submit bi-weekly briefing notes to the City Archaeologist for the full duration of the excavation. A preliminary excavation report in digital and hard copy shall be submitted to the planning authority for the attention of the City Archaeologist within four weeks of the completion of the excavation or of each phase of the excavation and a detailed final report submitted within twelve months of the completion of the excavation. The results of all archaeological excavations shall be evaluated for publication either as a monograph or scholarly article, within 1 year after archaeological site completion. Information about medieval sites will be disseminated to the public through the Friends of Medieval Dublin or similar free event within 1 year of site completion. The excavation archive shall be prepared in accordance with Dublin City Archaeological Archive (DCC, 2008) and submitted to the Dublin City Archaeological Archive within 1 year of excavation completion.</p>	
15.15.1.9	<p>Preservation In Situ</p> <p>Where a proposed development is at a known Monument / Site or within an Archaeological Zone, discussions about the retention of features within / below developments (preservation in situ) and mitigation options shall take place at the outset of project planning and shall be reviewed at each stage of the project. Before considering whether an</p>	<p>Should archaeological material be recorded during monitoring of development works, an appropriate programme of mitigation will be developed by the monitoring archaeologist in consultation with the City Archaeologist, the Department of Housing Local Government and Heritage (DHLGH) and the National Museum of Ireland National Museum of Ireland (NMI).</p>

	<p>archaeological site can be appropriately retained within a development (preserved in situ), the following shall be addressed: 1. The current state of preservation of the archaeological finds and deposits and how they contribute to the site’s significance. 2. The likely development and how these will affect the site’s significance. 3. For sites containing waterlogged archaeological remains, the availability and quality of water on the site and how sensitive this hydrological regime is to changes. Preservation assessments shall form a discrete part of desk-based assessments and site evaluation reports.</p> <p>Consideration shall be given to the impact of any development proposal on waterlogged deposits that could be potentially threatened through changes to the hydrological regime, water levels and quality. Test excavations shall be carried out to investigate and evaluate the deposits and the artefacts they contain in sufficient detail to establish their significance, their state of preservation and their susceptibility to adverse impact from proposed development. Preservation assessments (including characterisation of the environmental conditions of the deposits) to form a regular part of the evaluation methodology for sites where retention within the development is likely to be the final mitigation outcome. When the state of preservation of material is poor, and further burial following development is likely to cause additional damage to that material, excavation of the archaeological remains to recover their remaining significance and evidential value is the most appropriate strategy. Where sites contain waterlogged archaeological remains, water environment studies to determine water availability and water stresses may be required. If the</p>	
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	<p>condition of surviving material and deposits is good and development risks are not going to cause a change to below ground environments (including site hydrology), then harm to significance may be limited. In these instances, the retention of the site and its future management as part of the development may be achievable. For such sites, monitoring will not normally be necessary. Where there is concern about potential impacts of development on well preserved archaeological remains, it is good practice for monitoring to only be considered appropriate if a mitigation scheme is in place to manipulate water levels or provide access for future excavation if environmental conditions deteriorate.</p>	
<p>15.15.1.10</p>	<p>Piling and Archaeology</p> <p>Where piling is being considered as part of a foundation design on a site containing archaeological remains, a range of site-specific information will be needed to enable sound decision taking with regard to the particular technical issues raised by the use of piled foundations.</p> <ul style="list-style-type: none"> • The applicant shall provide sufficient information demonstrating an adequate understanding of the significance of the archaeological site and assessment of potential harm to that significance arising from the development. • The planning application shall include an appropriate desk-based assessment and where necessary the site will be evaluated by way of archaeological testing in advance of the grant of permission. 	<p>There are currently no known archaeological remains within the site.</p>

	<ul style="list-style-type: none"> • Sufficient geotechnical site investigation shall be undertaken in accordance with Eurocode 7, early in the design process to ensure that appropriate engineering information is available to allow for a flexible foundation design and reduce the impact on archaeological remains. • The developer shall consider foundation options and inform the piling contractors that archaeological remains are present on site before they tender. <p>Technical aspects associated with piled foundations will be appropriately assessed. These include but are not necessarily limited to:</p> <ol style="list-style-type: none"> 1. The potential for the particular pile type utilised to damage archaeological deposits. 2. The cumulative impact of successive piling on a site resulting in damage to so much of a site that future re-examination would not be worthwhile. 3. The potential for piling to change the site hydrology, draining waterlogged deposits. 	
15.15.1.11	<p>Recording of Historic Buildings</p> <p>Buildings on the first edition OS that are not protected structures shall be recorded as part of the archaeological assessment that accompanies the planning application. Appropriate specifications for the recording of historic buildings will be determined in consultation with the City Archaeologist. Records of historic buildings will inform decisions relating to the approval or implementation of a</p>	<p>A separate Architectural Heritage Assessment has been undertaken for the scheme by Molloy and Associates, which is set out Chapter 7 of the EIAR. This presents an appraisal of potential architectural heritage impacts arising from the proposed development and any mitigation measures etc.</p>

	<p>scheme of development as part of the planning process or to document buildings, or parts of buildings, which will be lost as a result of demolition or alteration.</p>	
15.15.2.1	<p>Architectural Conservation Areas</p> <p>Development in these zones must respect the existing character of the area and protect and enhance the setting and appearance of the streetscape and / or protected features. Details on the requirements for development within ACA's are set out in Policy BHA7 and BHA8 as set out in Chapter 11 as well as in the specific Framework for each ACA.</p> <p>Larger scale applications within or immediately adjacent to an ACA will need to provide an assessment, carried out by a suitably qualified conservation professional, of the impact of the development on the ACA the streetscape and the buildings in the immediate vicinity and demonstrate that there will be no material, adverse impact arising. Such an assessment should be accompanied by appropriate drawings, imagery and photomontages of the site and the surrounding context to assist the planning authority in assessing the impacts of the development.</p>	<p>Chapter 7 of the EIAR (Architectural Heritage) prepared by Molloy and Associates Conservation Architects fully considers the proximity of the Belmont ACA to the proposed development site. A Landscape and Visual Impact Assessment has also been prepared by Modelworks and is enclosed as Chapter 9 of the EIAR. 3D Design Bureau have prepared photomontages of the proposed development.</p>
15.15.2.4	<p>Retention and Re-use of Older Buildings of Significance which are not Protected</p> <p>Our built heritage is rich and varied. Much of our built heritage is not protected nor located within an ACA.</p>	<p>The proposed development includes the reuse of Tabor House and the Chapel to provide community/cultural space. The reuse and refurbishment of Tabor House and the Chapel will allow a new setting to be created in the landscape and the buildings will act as a focal point for the development especially entering the principal entrance from Milltown Road or walking through the pedestrian street from the northern end with glimpses of Tabor House shown through the setback of Block B.</p>

	<p>The re-use of buildings/structures of significance is a central element in the conservation of the built heritage of the city and important to the achievement of sustainability.</p> <p>In assessing applications to demolish buildings/structures of significance that are not protected, the planning authority will actively seek the retention and re-use of buildings and other structures of architectural, historical, archaeological, artistic, cultural, scientific, technical, social and/or local interest or those that make a positive contribution to the character and identity of streetscapes and the sustainable development of the city; also having regard to Policies BHA 05: Demolition of Regional Rated Buildings on NIAH and BHA 06: Buildings on Historic Maps. Where the planning authority accepts the principle of demolition, a detailed written and photographic inventory of the building may be required for record purposes.</p>	<p>The building elements to be demolished were considered for various uses however having regard to the existing limited floor-to-ceiling heights and poor infiltration of daylight to the building grouping for example, in addition to quantum of alterations that would be required which would essentially dramatically alter the appearance of some of the existing fabric, it was concluded that their adaption is not viable or in the best interests of the overall Masterplan for the site. Please find the Existing Feasibility Study attached as an Appendix to OMP Architect's <i>Masterplan and Architectural Design Statement. A Justification for Demolition Report</i> prepared by OCSC is also enclosed separately with this application. Chapter 7 of the EIAR (Architectural Heritage) prepared by Molloy and Associated Conservation Architects also details the works surrounding the existing structures.</p>
15.16	<p>Sustainable Movement and Transport</p> <p>Refer to standards in Appendix 5.</p>	<p>The proposed development has been designed in reference to the local sustainable movement and transport objectives. See submitted <i>Traffic and Transportation Assessment</i> for details.</p>
15.17.2	<p>Public Lighting</p> <p>Where significant lighting proposals are proposed, the applicant must demonstrate that the quality environment in the surrounding area is not impacted and set out details of light levels and mitigation measures as necessary.</p> <p>The provision of public lighting, including on public roads, shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates and should be designed to minimise the</p>	<p>The scheme has been designed with ecological considerations integral to the process.</p> <p>Details of the column height, siting and location of the lighting has been included in the Pritchard Themis documents.</p> <p>Images and dimensions of the specific lantern type and design have been included, final specification is by others as part of the detailed design process, this should include the energy efficiencies. Lux levels calculations have been carried out and provided as part of the <i>Lighting Report</i>. The <i>Preliminary Construction Management Plan</i> prepared by</p>

	<p>impact on protected species, such as light sensitive bat species in accordance with best practice, the National Parks and Wildlife Service (NPWS) Bat Mitigation Guidelines for Ireland (2006) and the Technical Guidance Note on Biodiversity for Development Management in Dublin City (DCC 2021).</p> <p>Applications for new roads and / or public spaces should ensure that the area is appropriately lit for accessibility and safety. Development proposals for public lighting shall include:</p> <ul style="list-style-type: none"> • Details of the column height, siting and location of the lighting. • Details of the specific lantern type and design. • Details of lighting specification including lighting class, lux levels and energy efficiencies. • Site lighting report to assess the impact of light overspill to the surrounding area. Site lighting should also be considered throughout construction period and the impact on the surrounding properties. Details of such should be included in the construction management plan. 	<p>DBFL Consulting Engineers includes management measures for lighting to reduce overspilling during construction such as switching off lighting during non-working hours where possible and utilising directional lighting.</p>
15.17.3	<p>Public Art</p> <p>Public art can make a positive contribution to the cultural identity and visual appearance of an area and can be utilised to identify historic events and features adding to the quality and engagement of the public realm. The provision of artwork on hoarding will also be supported in accordance with the requirements as set out below. New public artwork</p>	<p>The scheme includes provision for public art in the Public Plaza area and adjacent to the 'Secret Garden'. Please refer to the <i>Landscape Design and Access Statement</i> by Cameo and Partners Design Studio.</p>

	<p>should integrate with its immediate location and the context of the surrounding environment.</p> <p>Proposals for public artwork should:</p> <ul style="list-style-type: none"> • Consider scale, form and impact on the public realm, pedestrians and road users. • Illustrate a comprehensive understanding of site considerations, and the physical, • social, historical, topographical and architectural context. • Provide for the highest aesthetic quality in terms of materials and finishes with low • maintenance value. • Engage with the local community to enhance social relevance and significance. 	
15.18.1	<p>Construction Management</p> <p>All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan.</p> <p>Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of Construction and Demolition (C&D) waste; and Civil engineering projects which generate in excess of 500 cubic metres of waste materials used for development works on the site should also be accompanied by Construction Management Plans.</p>	<p>A <i>Preliminary Construction Management Plan</i> and a <i>Construction & Environmental Management Plan</i> forms part of the planning application package of documentation.</p>

	<p>The construction management plan shall set out the details of the on-site operations including traffic management (site access, deliveries and maintenance and staff parking), waste management, environmental impacts such as noise, air quality, vibrations and any other relevant detail associated with the development. Where appropriate, excavated material from development sites is to be reused on the subject site.</p> <p>The construction management plan should set out a clear timeline for the development, and details of the relevant on site contact for liaison with surrounding residents and businesses. For large construction projects (30 or more residential units of 1,000 sq. m. of commercial development), details of the site contact should be circulated to the local community, and where appropriate resident monitoring committees established for the duration of the project in order to promote best construction management and considered construction practices to protect the amenities of adjacent properties. The plan should consider the potential cumulative impacts of any adjacent development project under construction or planned for construction within the timeframe of the project, and set out appropriate mitigation measures to manage such cumulative impacts.</p> <p>In reviewing construction management plans, the planning authority will have regard to the following:</p> <ul style="list-style-type: none"> • Hours of operation. • Construction/phasing programme. • Community Liaison Strategy 	
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	<ul style="list-style-type: none"> • Traffic Management Plan including employee parking and movements. • Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures. • Cumulative impacts. • Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats. • The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan • Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater). • A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains. • Details of a water quality monitoring and sampling plan. • Measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed). 	
15.18.1.1	<p>Construction Traffic Management Plan</p> <p>Objectives and measures should be included for the management, design and construction of the proposed development to control the traffic impacts of construction insofar as it may affect the environment, local residents and the public in the vicinity of the construction works.</p>	<p><i>A Preliminary Construction Management Plan</i> forms part of the planning application package of documentation, which includes an Outline Construction Traffic Management Plan.</p>

	<p>Where demolition is taking place on site prior to the commencement of construction, a separate demolition construction traffic management plan is required.</p> <p>A Preliminary Construction Traffic Management Plan may be required during the Development Management process to ensure the feasibility of construction on constrained or restricted sites. Cumulative impacts with adjacent development sites should also be considered.</p>	
15.18.1.3	<p>Phasing</p> <p>Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial development in excess of 5,000 sq. m. and residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.</p> <p>A phasing proposal should be included within the construction management plan submitted with applications for agreement with the planning authority.</p>	<p>The development is proposed to be construction in 4 No. phases as summarised below:</p> <ul style="list-style-type: none"> • Phase 1 – Site Set Up, Enabling Works and Demolitions • Phase 2 – Basement Box • Phase 3 – Block D, Block F and works at Tabor House and The Chapel • Phase 4 - Block A1, Block A2, Block B, Block C and Block E (courtyard houses). <p>For more detail, please refer to the <i>Construction & Environmental Management Plan</i> enclosed separately.</p>
15.18.2	<p>Waste Management</p> <p>All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both and Construction and Operational Waste Management Plan.</p> <p>The construction waste management plan may form part of the overall construction management plan and shall</p>	<p>AWN Consulting have prepared an Operational Waste Management Plan (OWMP) and a Resource Waste Management Plan (RWMP) (covers Construction and Demolition Waste). These are included as Appendix 14.1 and 14.2 of the EIAR. Section 7.0 of the RWMP includes details on the reuse and recycling of materials. The OWMP details anticipated waste collection strategy throughout the document.</p>

	<p>detail the strategy in relation to on site waste storage, segregation and disposal. Development proposals shall recycle demolition material and re-use existing building materials where possible. In all developments of 30 or more housing units or commercial developments in excess of 1,000 sq. m, a materials source and management plan showing type of materials / proportion of re use/ recycled materials to be used shall be implemented by the developer.</p> <p>The operational waste management plan shall set out the strategy for waste collection, storage and recycling. All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area. See also Appendix 7 for further details.</p>	
15.18.4	<p>Basements</p> <p>It is the policy of Dublin City Council to generally discourage any significant underground or basement development or excavations below ground level of, or adjacent to, residential properties in Conservation Areas or to protected structures. Development of basements for residential use below the estimated flood levels for flood zone areas 'Zone A' or 'Zone B' will not be permitted (Policy SI20).</p> <p>It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level</p>	<p>The development includes a basement; however, we note that the site is located in Flood Zone C. A Basement Impact Assessment prepared by DBFL Consulting Engineers is enclosed separately.</p>

	<p>and would include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.</p> <p>Detailed guidance is set out in Appendix 9 regarding the content and scope to be considered in the preparation of a Basement Impact Assessment.</p>	
15.18.5	<p>Telecommunications and Digital Connectivity</p> <p>All new developments will be required to provide for open access connectivity arrangements directly to individual premises to enable service provider competition and consumer choice in line with Policy SI46 of the development plan.</p> <p>The provision and siting of telecommunications antennae shall take account of the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, (Department of Environment and Local Government, 1996), as revised by DECLG Circular Letter PL 07/12, and any successor guidance.</p> <p>Telecommunications antennae and supporting structures should preferably be located on industrial estates or on lands zoned for industrial/employment uses. Possible locations in commercial areas, such as rooftop locations on tall buildings, may also be acceptable, subject to visual amenity considerations. In terms of the design of free-standing masts, masts and antennae should be designed for the specific location.</p>	<p>The Development will provide for open access connectivity arrangements directly to individual premises which will enable service provider competition and consumer choice in line with Policy SI46 of the Development Plan.</p> <p>The immediate and local area in and around the proposed development is devoid of industrial estates and commercial areas and/or lands zoned for industrial/employment uses. Therefore, if such areas do not become available, the Local Authority may need to consider alternative options, so the area is adequately served with cellular coverage.</p> <p>The Applicant isn't seeking permission for telecommunication antennae and support structures. Notwithstanding, the population density created may require one in the future.</p> <p>The Applicant notes the last paragraph noted here and will take it into account should it seek planning permission in the future for telecommunication antennae and support structures if required.</p>

	<p>In assessing proposals for telecommunication antennae and support structures, factors such as the object in the wider townscape and the position of the object with respect to the skyline will be closely examined. These factors will be carefully considered when assessing proposals in a designated conservation area, open space amenity area, historic park, or in the vicinity of protected buildings, special views or prospects, monuments or sites of archaeological importance. The location of antennae or support structures within any of these areas or in proximity to protected structures, archaeological sites and other monuments should be avoided.</p> <p>Where existing support structures are not unduly obtrusive, the City Council will encourage co-location or sharing of digital connectivity infrastructure such as antennae on existing support structures, masts and tall buildings (see Policy SI48). Applicants must satisfy the City Council that they have made every reasonable effort to share with other operators.</p>	
15.18.6	<p>Plant Machinery</p> <p>Where required, the scale of plant at roof level should be minimised and have a suitable finish or screening so that it is discreet and unobtrusive. Plant, flues and lift overruns should not be included in the height of the building, as long as they are set back and properly screened and do not significantly add to the shadowing or otherwise of natural light beyond that of the main structure. Where plant rooms are highly visible, and occupy the majority of roof space, the impact of such will be assessed similar to an additional floor.</p>	<p>The provision of plant in the development is predominately at ground level. The lift overruns will not dominate the roofscape.</p>

<p>15.18.8</p>	<p>Solar Energy</p> <p>In line with NZEB requirements, Dublin City Council will require all new developments to provide for solar panelling / PV panels to contribute to the energy generation in a building where feasible.</p> <p>Large scale proposals for solar panels or any development in the vicinity of the airport will be required to submit a Glint and Glare Assessment. Domestic applications will be assessed on a case by case basis.</p>	<p>The proposed development includes PV Panels to convert solar radiation into electricity.</p> <p>A <i>Glint and Glare Assessment</i> prepared by Macroworks is enclosed separately with this planning application which conclude that no hazardous glint and glare effects will occur as a result of the proposed PV Panels.</p>
<p>15.18.9</p>	<p>Noise</p> <p>Development proposals for residential development within designated noise zones, such as Dublin Airport Aircraft Noise Zones or which may generate noise sensitive activities should be accompanied by a noise impact assessment to analyse the potential noise impact on the development proposal. The applicant is required to demonstrate good acoustic design has been followed to mitigate against any potential noise impacts. Airport Noise Zone C is partially located within the Dublin City Council administrative boundary.</p> <p>Construction noise assessment should form part of the construction management plan and set out clear mitigation measures in place throughout the entire construction phase.</p> <p>Operational noise should be assessed as part of the planning application to determine whether the proposed use of the development will impact on the ambient noise</p>	<p>A Noise and Vibration Chapter has been prepared by AWN Consulting as part of the EIAR (Chapter 13). This Chapter demonstrates that the scheme has been comprehensively considered from a noise perspective having regard to the mitigation measures that are proposed for certain façades in the scheme such as acoustic glazing and ventilation in addition to sound insulation in areas comprising entertainment noise for the operational stage.</p> <p>The <i>Preliminary Construction Management Plan</i> by DBFL Consulting Engineers also sets out measures in relation to noise and vibration during construction such as erection of a barrier (e.g. 2.4-metre-high construction hoarding and siting of noisy plant away from sensitive properties).</p>

	<p>levels of the surrounding environment. Appropriate sound proofing and noise mitigation measure should be provided where necessary.</p>	
15.18.10	<p>Air Quality</p> <p>All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan.</p> <p>As part of the operational management of a proposal, applicants are required to facilitate air extraction / ventilation units and other associated plant and services through the use of internal ducting. Details of such proposals shall be set out in planning applications as part of Mechanical and Electrical Engineering details.</p>	<p>An Air Quality and Climate chapter prepared by AWN Consulting is included as part of the EIAR (Chapter 12) and details the potential impacts that could occur on air quality during construction and operational stages. The <i>Preliminary Construction Management Plan</i> by DBFL Consulting Engineers also details the measures that will be implanted during construction in relation to air quality such as implementation of a dust management plan, sweeping hard surface roads to remove mud and aggregate materials and regularly watering roads that have potential to give rise to fugitive dust as needed during dry and/or windy conditions.</p>
15.18.11	<p>Ground Investigation</p> <p>Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application. This will determine the best practice design based on the soil composition. Where lands are considered unstable or infilled, a strategy for the support and or removal of underground lands shall be provided as part of a planning application.</p>	<p>The scheme includes the construction of a basement. As set out in Chapter 10 of the EIAR by DBFL Consulting Engineers (Land, Soils and Geology):</p> <p style="text-align: center;"><i>"Ground Investigations for the proposed development were carried out by Ground Investigations Ireland (GII) between January and June 2020."</i></p> <p>The <i>Ground Investigation Report</i> is included as Appendix 10.1 to the EIAR.</p>

<p>15.18.12</p>	<p>Ground Contamination</p> <p>Any contaminated land will require appropriate remediation prior to redevelopment, including, in some instances, removal of material from a site which may require a licence under the Waste Management Act, 1996, as amended, prior to the undertaking of such works (see Section 9.5.6). In all cases involving contaminated land, it is the policy of Dublin City Council to require the highest standards of remediation and where appropriate to consult with the Environmental Protection Agency and other relevant bodies to resolve the environmental pollution created by contaminated land.</p> <p>Where the previous history of a site suggests that contamination may have occurred, developers will be responsible for the following:</p> <ul style="list-style-type: none"> • Undertaking a detailed site investigation, soil testing and analysis to establish whether contamination has occurred. • Providing a detailed written report of investigation and assessment (including recommendations for treating the affected ground) to Dublin City Council. • The decontamination of sites prior to new development works taking place, and the prohibition of development until Dublin City Council is satisfied that the affected ground has been satisfactorily treated. • Decontamination activities should ensure that there is no off-site migration of contaminants via run-off, soils or groundwater. 	<p>As set out in Chapter 10 of the EIAR by DBFL Consulting Engineers (Land, Soils and Geology):</p> <p>"Ground Investigations Ireland's Environmental Assessment Report (refer to Appendix 10.2) notes that material sampled across the site is free of contamination and can be classified as non-hazardous."</p>
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15.18.14	<p>Flood Risk Management</p> <p>All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail (see Policy SI15 and SI16).</p> <p>Potential applicants should ensure consideration of residual risk without regard to any existing flood protection structures. Dublin City Council will assess planning applications with regard to the vulnerability classes of land-use and development types in accordance with the national guidelines. Potential applicants should refer to these and demonstrate adherence to them.</p> <p>In relation to rivers, potential applicants should give consideration to potential river channel impacts, adhere to the Inland Fisheries Ireland guidance and ensure access for wildlife to the river where possible.</p>	Not Applicable to the Proposed Development -The site is located in Food Zone C.
Appendix 5 – Transport and Mobility: Technical Requirements		
-	All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS.	A <i>DMURS Design Statement</i> prepared by DBFL Consulting Engineers accompanies the planning application. The report demonstrates how the development will be constructed in accordance with DMURS.
2.2	Traffic and Transport Assessments (TTA) and Road Safety Audits will be required for major developments, in accordance with the National Roads Authority (NRA) (now Transport Infrastructure Ireland (TII) Traffic and Transport Assessment Guidelines (2014) and any subsequent review, to assess the traffic impacts on the surrounding road	A <i>Traffic and Transportation Assessment</i> accompanies the planning application. It is also noted that a <i>Quality Audit</i> of the scheme proposals have been undertaken, the scope of which included a Stage 1 Road Safety Audit. This <i>Quality Audit</i> forms part of the planning application documentation.

	network and provide measures to mitigate any adverse impacts.	
	Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.	It is noted that a <i>Quality Audit</i> of the scheme proposals have been undertaken, the scope of which included a Stage 1 Road Safety Audit. This <i>Quality Audit</i> forms part of the planning application documentation.
2.3	Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/reduced provision of car parking to serve a development.	A <i>Mobility Management Plan</i> in addition to a <i>Parking Strategy</i> form part of the planning application documentation.
2.4	Having regard to this limited capacity, service areas shall be provided where possible within the curtilage of the site. These areas are to be used exclusively for service and delivery vehicles, details of which will be determined by the planning authority. The servicing requirements for any development should be established early in the preplanning process. Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site.	The proposed development identifies the Sandford Road site access to be used for deliveries to the site with dedicated loading bay/delivery area located adjacent to the reception. This area is to be used for service and delivery vehicles. There are also set-down spaces available through the Milltown Road access point proximate to Tabor House.

	<p>Where no off-street services or on-street storage can be provided, it shall be a requirement of all new developments to submit full details of all new deliveries, including their time, frequency and manner, to the planning authority.</p>	
<p>2.5</p>	<p>Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated. Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process.</p>	<p>Please see the submitted <i>Traffic and Transportation Assessment</i> which outlines the route which emergency vehicle can take through the site. A vehicle swept-path analysis has also been submitted demonstrating the safe manoeuvrability of all emergency vehicles servicing the site.</p> <p>A waste holding area has been identified immediately adjacent to the Milltown Road site access, negating the need for refuse vehicles to route through the subject site.</p>
<p>2.6</p>	<p>For larger developments (residential and non-residential), a Delivery and Service Management Plan shall contain, but is not limited to, the following information:</p> <ul style="list-style-type: none"> • Details how the proposed development will be accessed and served by deliveries, including refuse vehicles and emergency vehicles; • Confirm the number, type and frequency of service vehicles envisaged for the development and detail the locations from which servicing will occur and how it will be managed; • Swept-path analysis demonstrating the safe manoeuvrability of all vehicles servicing the site. <p>Where a development is located in close proximity to a Luas line, consideration to the impact of deliveries and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined (See also section 9.2 below).</p>	<p>Please see the <i>Traffic and Transportation Assessment</i> as well as the <i>Parking Strategy</i> Report which outline the relevant details with regard to this policy for the subject development.</p>

<p>2.5</p>	<p>Where car parking is provided for residential or non-residential developments, a Car Parking Management Plan shall be provided regarding the continual management and assignment of spaces to uses and residents over time. Generally car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements. A management scheme for any visitor car parking shall also put in place. Where car club spaces are provided within a development, a letter of confirmation from the relevant provider shall be included with an application and details submitted regarding the operation of the service within a development.</p>	<p>Please see enclosed the submitted <i>Traffic and Transportation Assessment Report</i> and the <i>Parking Strategy Report</i> which outlines in detail how the available car parking spaces will be managed throughout the development. A letter of intent has been received from GoCar.</p>
	<p>Where car parking is provided for a residential development, a rationale for the quantum of car parking proposed shall be provided. This should include an analysis of census data in relation to the car ownership levels by occupiers of a similar development (i.e. houses or apartments) in the relevant electoral area and existing mode split. Reference shall also be included to the quantum of parking in the immediate area as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed).</p>	<p>Please see enclosed the submitted <i>Traffic and Transportation Assessment Report</i> and <i>Parking Strategy Report</i> which detail the rationale for the proposed car parking provision using a number of sources.</p>
	<p>Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential</p>	<p>Please see enclosed the submitted <i>Traffic and Transportation Assessment Report</i> which details the proposed bicycle parking provision for both long (residents and staff) and short (visitors) term users and how these users may access these facilities from either of the site accesses.</p>

and commercial developments with zero or reduced car parking provision is not conducive to fully accessible bicycle parking and is discouraged by Dublin City Council.

Appendix 11 – Technical Summary of Green & Blue Roof Guide

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Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application. The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.

Table 1: Green Blue Roof Minimum Coverage

Type of green roof	Minimum coverage (% of total roof area being developed)
Extensive	70%
Intensive	50%

The percentage coverage is considered to make a reasonable allowance for the provision of overruns, roof lights, fire breaks, service penetrations and hard landscape.

Exemptions
 Where roofs include photovoltaic (PV) panels, the design should consider the appropriateness of the PV panels being positioned over the vegetated areas of the roof.
 Roof areas that are not considered for a green roof due to the presence of solar panels should still be considered for a blue roof.

Green / blue roofs provided for the development. Please refer to DBFL Consulting Engineers *Infrastructure Design Report* and relevant drawings. Green / blue roof provision exceeds DCC's minimum coverage of 70%.

6.13 Summary

The proposed development to provide a residential development comprising 562 No. residential units, a creche, community/cultural space, café/restaurant and public and communal open spaces fully accord with National, Regional and Local planning policies and objectives.

It is considered that the design response provides a contemporary architectural solution that maximises the development potential of the subject lands in the interests of sustainable development and having regard to the location of the lands in close proximity to high-frequency public transport employment locations, services and facilities. The design has sought to respond to the locational characteristics of the site proximate to low density houses yet provide a development that also responds to the site characteristics and opportunities presented by a very large corner underutilised plot that is positioned on a key arterial route in Dublin.

7.0 CONCLUSION

We submit that the subject site is ideally suited to the provision of a Residential-Led Mixed Use Development with a creche, café/restaurant and community/cultural space, due to its sustainable location in Dublin in proximity to employment locations, public transport, services and facilities.

The principal goal of the subject development, which seeks to provide 562 No. units on this key underutilised site in Dublin 6 is to open up the site to the wider community through the provision of an extensive range of public open spaces to bring historic buildings back into active use and to increase housing supply on a strategically located large plot of underutilised land.

The development has been designed to accord with Planning Policy and will provide a high-quality living environment that provides opportunities for social interaction and integration. As such, it is considered that the proposed development represents the proper planning and sustainable development of the area.

Yours sincerely

A handwritten signature in dark blue ink that reads 'Patricia Thornton'.

Patricia Thornton
Director
Thornton O'Connor Town Planning

Appendix A – Letter Received from the Jesuit Community

Jesuit Community Milltown Park

Steve Cassidy
 Managing Director
 Ardstone Homes
 48 Fitzwilliam Square
 Dublin 2
 D02 EF89

1st June 2023

Re: Former Jesuit Property at Sandford Road, Milltown Park, Dublin 6

Dear Mr. Cassidy,

I can confirm that the former Jesuit Community property at Sandford Road, which was purchased by Ardstone Homes ("Sandford Living Limited") in 2019, and which is the area numbered 1 on the map below, ("the subject property") is no longer required by the Society for the purposes of its functions and mission.

The subject property which formed part of the Jesuit Milltown Park campus includes the original period buildings and adjoining lands. The Society has retained its modern residential and administration accommodation to the south of the application lands with separate access from Milltown Road and which are numbered 2.



The Jesuits originally purchased the entire Milltown Park campus in the 1850s and subsequently adapted and extended the original period residence to provide a novitiate followed by Schools of Philosophy and Theology and later a community chapel, theatre and library. For more than 160 years

the role of the Milltown Park community has been the formation of Jesuits, and, since the 1960s, expanded to include other religious congregations in Theological, and Philosophical Ministry.

Since the 1960s these studies were expanded to include the education of lay people as part of a move towards greater lay involvement in Church Ministry. Both these areas have experienced a dramatic decline since then. In tandem with other Religious Orders across Ireland, the Jesuit Community has experienced a significant decline in vocations which is impacting on the scale of accommodation required. Prior to the disposal of the lands in 2019, the Community considered how best to maximise the use of its property, staff and resources for the future at Milltown Park.

With the departure of the clerical students, the older Milltown buildings and adjoining land became surplus to requirements and impossible to maintain by the Community. In the meantime, the Jesuits developed modern residential and administration accommodation to the rear including Milltown Park community house and Cherryfield Lodge nursing home, which are being retained by the Jesuit Community, thus leaving the subject property redundant, which led to its sale in 2019. Prior to disposing of the subject property, we considered our future requirements thoroughly and we can confirm that the lands that we have retained are entirely adequate for our future needs. In this regard, planning permission has recently been granted by Dublin City Council for a new archive building (DCC Reg. Ref. 3116/22) within the retained Jesuit lands, lands we retained for this purpose.

I can also confirm that throughout the Society's ownership of the Milltown Park Campus, the subject property and the retained property were not available for public use and that access to the site was strictly managed and controlled by restricted opening of the gates at Sandford Road and Milltown Road.

Yours sincerely,



Thomas Casey SJ
Rector, Jesuit Community Milltown Park,
Milltown Road, Dublin 6