



Shanganagh Residential Development Planning Statement

Proposed Development at Shanganagh Castle

January 2020



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DEVELOPMENT PLANNING | ENVIRONMENTAL PLANNING | MASTERPLANNING

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1.0 INTRODUCTION

This statement has been prepared by HRA Planning Chartered Town Planning Consultants on behalf of Dún Laoghaire-Rathdown County Council and the Land Development Agency in support of a residential development on lands situate in the townlands of Shanganagh, Shankill and Cork Little, Co. Dublin.

This statement accompanies an application for approval to An Bord Pleanála made under Section 175 of the Planning & Development Act 2000 as amended for a residential development of 597 no. residential units comprising housing, apartment and Build to Rent (BTR) apartment units with ancillary commercial units. The purpose of the report is to provide clarity on the nature of the development project, and to demonstrate how the proposed development is consistent with the planning policy and landuse development objectives for the area.

The purpose of the report is to provide clarity on the nature of the development project, and to demonstrate how the proposed development is consistent with the planning policy and landuse development objectives for the area. This report should be read in conjunction with the Sustainable Neighbourhoods & BTR Justification Report also prepared by HRA Planning and which accompanies the submission to An Bord Pleanála.

2.0 SITE LOCATION and PLANNING CONTEXT

2.1 Location

The subject site is located adjacent to Shanganagh Park in southern Co. Dublin positioned between Shankill Village and the settlement of Bray. The site is situated on the eastern side of the old Dublin Road (R119) and the M11. The immediate surrounding area is characterised by a mixture of residential development and open space. The residential element comprises mainly of housing developments including Crinken Glenn, Castlefarm and Olcovar. The open space comprises notable amenities and facilities including Shanganagh Park, Shanganagh Cemetary and Woodbrook Golf Club.

The subject site is located in an area identified for residential development under the Woodbrook – Shanganagh LAP (2017 – 2023) – hereafter referred to the LAP. The site is bound to the west by the R119, the north by residential housing (Castle Farm), by Shanganagh Castle to the east and by Shanganagh Park to the south and further to the east

The residential site is situated between two major public transport arteries. The existing DART railway line is located east of the site with an existing station in Shankill village (circa 2.1km to the north) and a future station to be provided within the Woodbrook lands to the south (less than 1km from the site). To the west is the Old Dublin Road (R119) which is planned to accommodate Bus Connects Route 19 Bray – City Centre in the future. The M11 motorway lies further to the west.

The established settlement of Shankill largely consists of a more traditional village settlement pattern with a central main street, containing more localised shops and facilities and surrounded by relatively low density housing estates constructed through the seventies and eighties. A number of newer medium to high density residential developments, however, have been constructed in Shankill including for example – Olcovar, Aubrey and The Bridge.

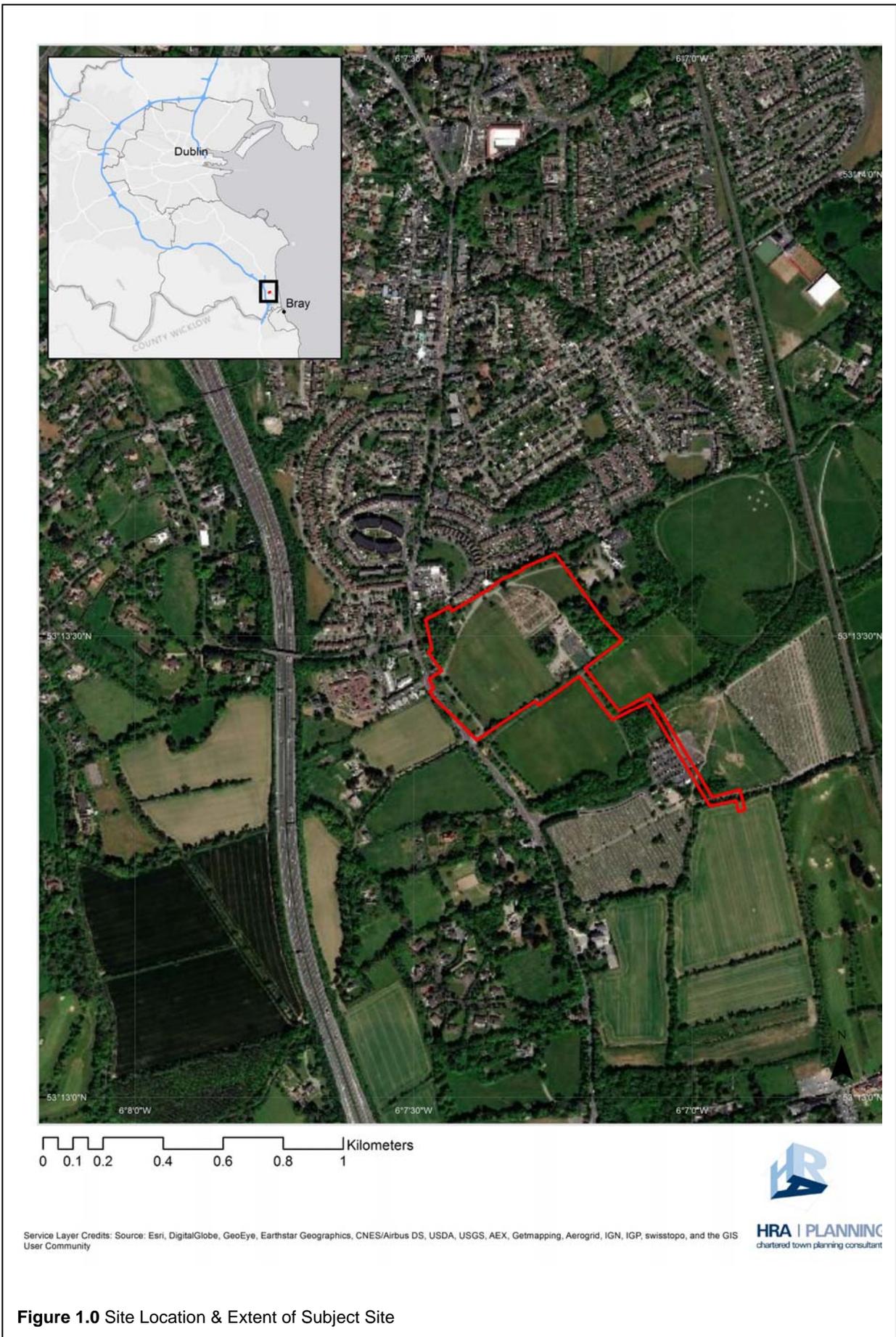


Figure 1.0 Site Location & Extent of Subject Site

The predominant residential unit in the area is that of a house. Of the 1,904 households in Shanganagh ED, 91 per cent comprise a house / bungalow with only 9 per cent comprising a flat / apartment¹. Most of these units were constructed between 1981 and 1990 with only 215 no. units constructed since 2001. Some 79 per cent of the units are owner occupier with 15 per cent rented from a private landlord and almost 4 per cent rented from the local authority or a voluntary housing authority. It can be concluded that the predominant unit and tenure type in the area is that of an owner-occupied house.

2.2 Existing & Planned Uses

The lands proposed for residential use is currently dominated by grassland and an existing playing pitch, garden allotments, greenhouses and storage sheds, an existing two-storey house, and localised areas of plantation woodland.

There is a cluster of 8 no. detached dwellings within Castle Farm which directly back on to the proposed development site. These houses are closest to the proposed development. Whilst there is a row of semi-detached units adjoining the site also within Castle Farm, these units are set back from the northern site boundary, substantially separated by an internal access road and green buffer with extensive hedgerow and boundary planting.

Much of the land immediately surrounding the subject site is zoned “*to preserve and provide for open space with ancillary active recreational amenities*” (Objective F). Shanganagh Park and its associated sports facilities, including Shanganagh Cemetery and proposed Crematorium (Part 8 Consent Approval) are located adjoining the subject site to the south. A masterplan has been prepared for the park, to facilitate its development into a regional park for the benefit of not only the local community but also the wider area. The masterplan provides for a significant number of playing pitches, playground, access routes and links and facilitates increased levels of tree planting.

In addition to Shanganagh Park, Woodbrook Golf Course lies in proximity to the site, with the closest point located some 710m east of the application site. The golf course is separated from the subject site by the existing rail line. Beyond the golf course, also separated by the rail line is the sea and Shankill beach situated some 915m from the site.

Immediately east of the subject site is Shanganagh Castle, a protected structure and is listed on the Record of Monuments and Places (RMP). Notwithstanding that ownership of the castle has not yet been transferred to Dún Laoghaire-Rathdown County Council (but it is anticipated to be in the near future as part of a land-swop necessary to facilitate the development of residential units at Woodbrook) a multi-disciplinary steering group has been assembled to manage the integration and refurbishment of the Shanganagh Castle and building. Currently the team is gathering site / building analysis information and is developing a strategy of reuse and integration for the Castle and its building that accords with the objectives of the Local Area Plan in the context of the wider community, the proposed Shanganagh residential development and the surrounding high amenity park lands.

South of the subject site, immediately beyond Shanganagh Park and cemetery, is the Woodbrook land which is also zoned for the provision of new residential communities. A planning application (PL06D.305844). was recently lodged with An Bord Pleanála under the legislative provisions of Strategic Housing Development (SHD) for 685 no. residential units, creche facility, distributor road and

¹Small Area Population Statistics, Census of Population 2016

temporary car parking to facilitate future development of a new DART station. No decision has been made on the proposed development to date.

2.3 Land Evolution & History

There is no relevant planning history on the subject lands.

Shanganagh Castle and its Demesne was sold to the State in c.1936 when it was extended and used as a College of Education. It was then used as an open juvenile prison from 1969 to 2002. The castle and surrounding lands of 11.3 hectares were sold by the Department of Justice after the closure of the prison. Dún Laoghaire-Rathdown County Council purchased 8.4 hectares and the 2.5 hectares housing the castle building and its gardens were sold to a private development company.

A depot was constructed to the south of the planted woodland, and the adjoining fields to the south and east were developed as Shanganagh Park, containing football pitches and paved paths for walking.

As part of a long planned tripartite exchange of land within Shanganagh - Woodbrook, Aeval (the applicant advancing the Woodbrook scheme) will transfer an equivalent '4.4 hectares' area to Dún Laoghaire-Rathdown County Council comprising of 2.5 hectares at Shanganagh Castle and 2 no. lots of zoned residential lands at Woodbrook with a combined area of 1.89 hectares. It is understood that the tripartite agreement follows on from an original draft Heads of Agreement between the parties dating back to 2006 when Aeval originally acquired the Woodbrook lands. It is understood that upon receipt of a successful determination of the Woodbrook SHD planning application that the tripartite agreement will automatically trigger land exchanges between the parties, and the applicant will then effectively own and control Shanganagh Castle.

All the land within the application site is in the ownership of the applicant, with the exception of a small area of land at the southernmost extremity of the proposed greenway. This area of land, comprising 135sqm extends into the Woodbrook development in order to facilitate a connection to their proposed wastewater network. A letter of consent has been secured from Aeval Limited to facilitate such connection, once constructed.

3.0 NATURE & EXTENT OF DEVELOPMENT PROPOSAL

3.1 Description of the Proposed Development

The application for approval to An Bord Pleanála under Section 175 of the Planning & Development Act 2000 – 2018 (the Act) is accompanied by detailed drawings and a detailed Architectural Design Statement, prepared by ABK Architects, which provides a rationale for the design of the proposed scheme and the dwelling types proposed.

The proposed development has been comprehensively described in the public notices accompanying the submission to An Bord Pleanála. A Site Layout Plan is detailed in Figure 2.3. A summary of the description and nature of development is provided hereunder:

- Construction of 597 no. residential units (ranging from 1 – 6 stories in height with one block comprising a seventh storey setback) in a combination of housing, apartment and Build to Rent apartment units.

- Provision of 1 no. detached unit; 14 no. semi-detached units, 36 no. terraced houses; and 40 no. apartments and 506 no. Build to Rent apartments in 8 no. blocks of development.
- Provision of resident services & amenities including (a) Gym; (b) residents lounge/cinema room; (c) Function Room; (d) Gallery/Community Room; (e) 2 no. Lounge areas; (f) Business pods; and (f) Co-Working Office units.
- Provision of resident support facilities including (a) Concierge Facilities; (b) Parcel /Store Room; (c) Central Energy Centre; (d) waste management areas; and (e) bike storage rooms.
- Construction of a (i) creche facility with capacity to accommodate 107 no. children; (ii) local shop of 103sqm (NFA) and (iii) local café of 125sqm.
- Provision of water services, foul and surface water drainage and associated connections across Shanganagh Park to the proposed Woodbrook residential scheme with attenuation proposals including permeable paving, green roofs & swales.
- Extensive landscaping and public realm works including (a) regeneration of the existing pond within the Demesne; (b) provision of playground and kick about areas; and (c) new pedestrian and cycle connections through the adjoining parkland to the south to facilitate a future connection to the proposed Woodbrook DART station.
- Works to the existing Shanganagh Castle entrance to the Dublin Road, including relocation of the existing entrance to the north; upgrade works to facilitate a signalised junction and provision of a separate pedestrian access. The existing Shanganagh Castle Entrance shall remain operational on a temporary basis to facilitate construction traffic
- Demolition of an existing house, and glasshouses and maintenance buildings located within the Parks Maintenance Depot.
- All associated and ancillary site development and infrastructural works, hard and soft landscaping and boundary treatment works.



Figure 2.3 Site Layout Plan – Source: ABK Architects

3.2 Phasing

It is anticipated that construction will commence on site in Q1 2021 subject to the discharge of any pre-commencement requirements.

It is intended to deliver the development in the shortest timeframe possible. Based on contracting market feedback to date, an overall construction duration of circa 3 years would be reasonably achievable. The phasing plan detailed on Drawing No. 788/PA1125 provides for four phases of development over a period of 3.5 years and the estimated timeframes for each phase is detailed in Table 2.1.

Phase	Extent of Development	Approx. Timeframe
Phase 01	51 no. affordable houses for sale and creche	14 months
Phase 02	230 no. units including 195 no. cost rental and 35 no. social Blocks A, B, C & D	18 months
Phase 03	144 no. units including 104 no. social and 40. No. affordable for sale Blocks E & F	18 months
Phase 04	172 no. units including 111 no. cost rental and 61 no. social Blocks G & H	18 months

Table 2.1 Proposed Phasing of Development

The timeframes provided are indicative only and there is likely to be overlap between phases. Generally, the foundation and structural works of each phase is likely to proceed at the same time as the fit out and commissioning of the previous phase.

The phasing plan as proposed is relevant to the current market and economic climate. Should the current market significantly shift, then a revised phasing approach may be necessary.

3.3 Net Developable Area

Notwithstanding that the subject site as outlined in red comprises 9.69 hectares, the net developable area has been calculated at 7.03 hectares. The net developable area excludes that part of the site that cannot be developed, including significant tree stands and the woodland area measuring 1.54 hectares (identified in dark green in Figure 2.4), the existing Dublin Road and the proposed greenway connecting the site to Woodbrook

The net developable area includes 1.7 hectares of public open space required to service the development. When this area is considered in conjunction with the woodland and significant tree stands (1.54 hectares identified in dark green), the total open space provision within the development site increases to 3.31 hectares. This represents 34 per cent of the overall site identified in red or 39 per cent of the site excluding the Dublin Road and the proposed greenway. The retention of natural areas / open space is significant in the context of the overall development proposal

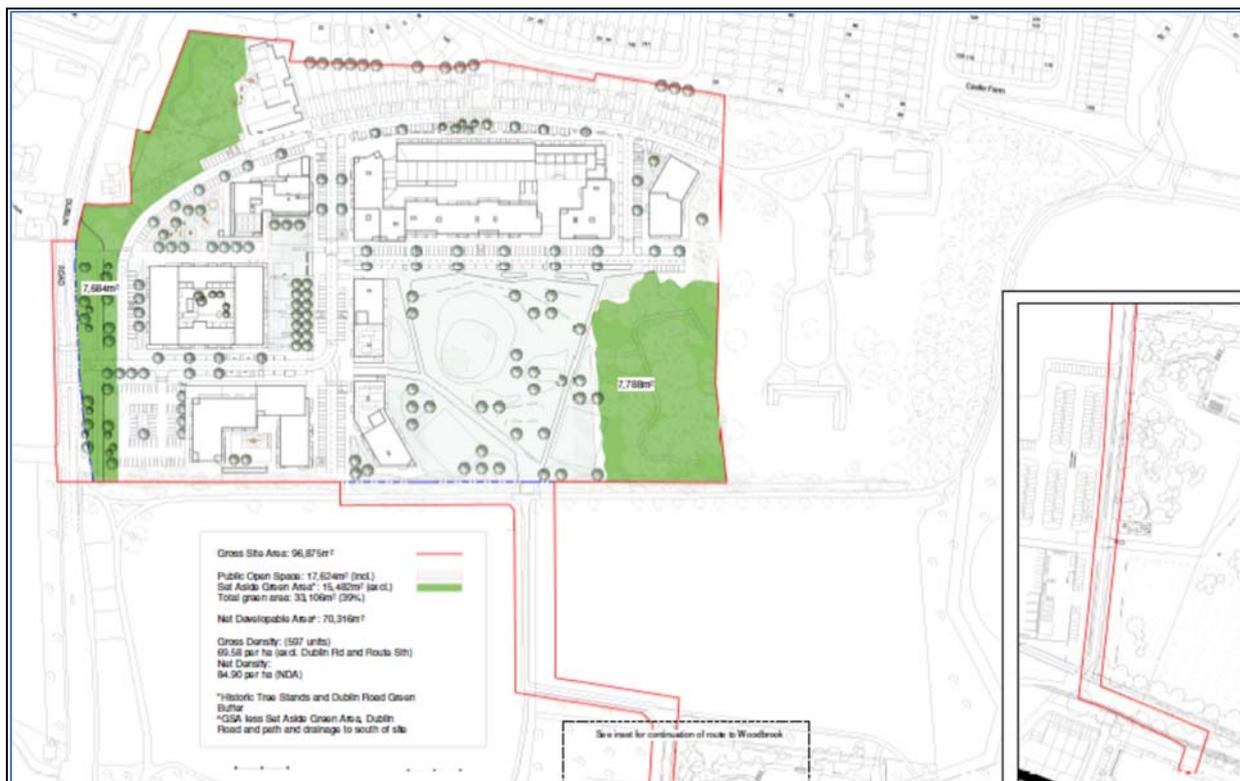


Figure 2.4 Net Developable Area

3.4 Development Statistics

The proposed development provides for 597 no. units and will provide for a mixed-tenure development, facilitating units for sale, social housing and rent as detailed in Table 2.2 across a range of unit sizes, detailed in Table 2.3. The social housing and rental units comprise Build to Rent apartment formats in accordance with Specific Planning Policy 7 and 8 as set out in the “Sustainable Urban House: Design Standards for New Apartments 2018” (Apartment Guidelines). The range and mix of units will ensure that the proposed development caters and provides for different household typologies in a sustainable and community-based manner.

Unit Format	Unit Type	Unit Location	No. of Units
Affordable Sale	Houses	Northern Boundary of Site	51
Affordable Sale	Apartment	Block F	40
BTR Social Units	Apartment	Blocks D, E & H	200
BTR Cost Rental Units	Apartment	Block A, B, C, G	306

Table 2.2 Mixed Tenure Development Proposal

Unit Size	Detached	Semi Detached	Terraced	Apartments	% Mix of Overall Development
Studio				29	4.8%
1 bed				165	27.6%
2 bed	1	14	15	281	52%
3 bed			21	69	15%
4 bed				2	0.3%
Total	1	14	36	546	100%

Table 2.3 Unit Size and Number Across Entire Development

The number of units proposed within the overall development seeks to accommodate higher density development on site in accordance with national, regional and local policy. The proposed development results in a net residential density of 85 no. units per hectare based on a net site area of 7.03 hectares.

Development Statistics	Gross	Net
No. of Residential Units	597 units	
Gross Site Area	9.69 hectares	7.03 hectares
Density Gross	62 units per hectare	85 units per hectare
Gross Floor Area	61,691sqm	56,641sqm
Building Height	2 – 6 storey with 7 storey set back	
Public Open Space Gross	3.31 hectares	1.76 hectares

Table 2.4 Development Statistics

4.0 DEVELOPMENT PROPOSAL CONSIDERATION

4.1 Residential Units

The massing and distribution of units across the site has responded to Objective SC5 in the Woodbrook – Shanganagh Local Area Plan 2017 – 2023 (LAP).

Residential blocks have been distributed across the site with higher density to the front (west) providing a strong frontage to the Dublin Road and positioned around a proposed urban square within the development. Medium density is proposed on the southern side of the castle access road overlooking the pond and existing woodland, positioned immediately west (to the front) of Shanganagh Castle. Lower density development, comprising two storey terraces dominates the northern site boundary, adjoining the existing residential development of Castlefarm, thereby ensuring the protection of their residential amenity. This two storey terraced element also flanks the southern side of the access road increasing to three storey as one travels east towards the castle.

A new public space is proposed at the heart of the community that creates a unifying urban focus for the development. The Square, which is framed by Blocks A, E, F G & H runs North-South and is traversed by the entrance road at its southern end and by the cycle-pedestrian route that follows the visual axis to Shanganagh Castle at its northern end. It is animated by a range of communal services and facilities further detailed in Table 2.4.

Own Door Residential Units

A total of 51 no. own door residential units are provided, fronting onto the castle access road, predominantly of two storey design but increasing to three storey on the southern side of the castle access road, to the east. Four different house types are proposed with units ranging in size from two bed to three bed, comprising 1 no. detached unit; 14 no. semi-detached units and 36 no. terraced houses.

Apartment Units

There are 8 no. blocks of development proposed. The height, type, number and unit mix of each block is detailed in Table 2.4 below.

In addition to apartment units, 4 no. blocks accommodate a range of services and facilities to support the 506 no. BTR units proposed. Rather than divide these services and facilities across each block of development, the services and facilities have been strategically located on the ground floor of those buildings defining the proposed urban square, thereby ensuring active ground floor uses. The intention is that the facilities will serve the entire development as opposed to individual blocks. The amenities and facilities are accessed independently from the blocks, thereby ensuring that they are tenure blind, enabling a shared environment centered around the proposed urban square.

Block	Height	Total Units	Unit Mix	Unit Type	Services & Facilities
A	6 storeys	61	6 no. studio	BTR Cost Rental	Residents Lounge / Cinema Gym
			25 no. 1 bed		
			19 no. 2 bed		
			11 no. 3 bed		
B	6 / 5 / 4 storeys	101	12 no. studio	BTR Cost Rental	Lounge
			13 no. 1 bed		
			65 no. 2 bed		
			11 no. 3 bed		
C	5 storeys	33	1 no. studio	BTR Cost Rental	
			25 no. 2 bed		
			7 no. 3 bed		
D	5 / 3 storeys	35	18 no. 1 bed	BTR Social Rental	
			8 no. 2 bed		
			7 no. 3 bed		
			2 no. 4 bed		
E	6 / 4 storeys	104	47 no. 1 bed	BTR Social Rental	Concierge / Storage Room Gallery / Community Room Lounge Local Shop
			42 no. 2 bed		
			15 no. 3 bed		
F	6 storeys	40	10 no. 1 bed	Affordable Sale (Non BTR)	Function Room Business Pods Cafe
			30 no. 2 bed		
G	6 / 5 storeys with 7 storey set back	111	10 no. studio	BTR Cost Rental	Co Working Office Unit
			26 no. 1 bed		
			62 no. 2 bed		
			13 no. 3 bed		
H	6 storeys	61	26 no. 1 bed	BTR Social Rental	
			30 no. 2 bed		
			5 no. 3 bed		

Table 2.4 Block Analysis of Development Proposal

4.2 Ancillary Commercial Units

A local retail unit of 141sqm gross retail floor area and 103sqm net floor area is proposed on the ground floor of Block E, directly fronting onto the proposed urban square. The retail unit is intended to serve local top – up convenience shopping only. The retail unit is proposed, mindful of the fact that a local neighbourhood centre is proposed within the overall masterplan developed for the Woodbrook site. A green link (pedestrian and cycle) is proposed as part of this development, linking Woodbrook with the subject site.

A small café of 125sqm is proposed at ground floor level in Block F, also fronting and overlooking the proposed urban square. The café is not intended as a destination, but rather is intended to function as a gathering space for the residents within the development proposal, thereby facilitating social and community interaction.

4.3 Creche

The single storey creche facility is located on the northern site boundary adjacent to an established woodland setting, with a floor area of 778sqm. The creche has capacity to accommodate 107 no. children and has capacity to serve the development proposal. In accordance with the Childcare Facilities - Guidelines for Planning Authorities, provision has been made for 20 no. childcare spaces per 75 no. residential units, excluding 1 bed and studio units.

A dedicated play area of 2,725sqm is provided to exclusively serve the creche. This dedicated play area is complimented with walking paths through the adjoining woodland and a public playground to be provided on open space immediately west of Block A and north of Block E.

4.4 Public Realm & Open Space Provision

The development proposes the creation of a series of urban and landscaped public spaces. These include:

1. A buffer is proposed between the Dublin Road and the proposed development in accordance with Objective SC31 of the LAP. It is conceived as the re-establishment of the woodland setting that once framed the approach to Shanganagh Castle and formed the setting for the original Gate Lodge. Where possible, existing trees are retained with additional specimens added to create a woodland area along the boundary.
2. A new low boundary wall with railings set back from the road will provide an enhanced landscaped space for pedestrians. Screened from the busy traffic of the Dublin Road by a band of trees, the new footpath connects with existing footpaths at the entrance to Shanganagh Park to create a generous wooded walk for passers-by. This landscape motif of planted buffer and path is in keeping with Shanganagh Landscape Character Area Strategy as identified in Appendix 7 of the Dún Laoghaire-Rathdown County Development Plan, 2016-2022 (CDP) which seeks to maintain the sylvan character of the Old Dublin Road.
3. Retention and enhancement of the remains of original picturesque parkland setting with its ornamental pond that once established the foreground to Shanganagh Castle be retained and enhanced to serve as an informal amenity space for residents and an extension of the adjacent Shanganagh Park.
4. Provision of a new urban square. The Square is a new public space at the heart of the community that creates a unifying urban focus for the development. Designed as an urban square, the space is comparable in scale to such spaces as Jervis Square in Dublin.

The primary public spaces are interspersed with secondary 'nodes' that provide activities and animation to the Public Realm. These include:

- A paved gathering space to the front of the crèche;
- A widened pavement incorporating seating along the pedestrian route to Castle Farm
- A Playground to the west of Block D
- A terrace to the front of the Café at the corner of Block F

4.5 Access & Parking

An assessment of traffic effects is set out in Chapter 15.0 of the accompanying EIAR and an Outline Travel Plan has been prepared by Punch Consulting. The Outline Travel Plan reduces car parking in the context of the location of the site in proximity to services and facilities and in particular the planned public transport infrastructure intended for the area

Vehicular access to the site involves the relocation of the existing access to Shanganagh Castle to the north and the provision of a new signalised junction on the Dublin Road which provides for right-hand turning into the development for vehicles travelling northwards along the Dublin Road as well as cycle and pedestrian crossing points

4.6 Landscape Strategy

The Landscape Architecture Design Report prepared by Aecom and accompanying the application provides a comprehensive presentation of the proposed external works for the subject site. The design approach illustrates the design development and intent in conjunction with the vision, policies and objectives as identified within both the Dún Laoghaire-Rathdown County Development Plan 2016-2022 and the Woodbrook-Shanganagh Local Area Plan (LAP) 2017-2023. Furthermore, the design approach sets out the design principles that form the proposed intervention which include:

- Historic landscape retention
- Multi-modal connectivity
- Amenity through variety
- Resilience in design
- Landscape character

4.7 Drainage Strategy

The drainage strategy is focused on meeting the requirements of Irish Water and Dún Laoghaire-Rathdown County Council (DLRCC) in terms of design, arrangement and clearances to other infrastructure.

Foul Water

The existing houses adjacent to the northern boundary of the site will be drained via private gravity foul drains which connect to the public foul system in the adjacent Castlefarm development. It is proposed to service the development via a 225mm diameter gravity system through the adjacent Shanganagh Park connecting to the proposed system for the Woodbrook SHD development. From there foul water will then be pumped to the existing Irish Water system at St. Anne's Park Housing Development to the north of Shanganagh Park via a proposed rising main.

The rising main is to be constructed by Aeval Unlimited Company as part of the Woodbrook residential development, in agreement with the applicant. A letter of consent is attached to the application for approval. Upon completion of the final rising main by Irish Water, wastewater flows will then be transferred to the new rising main and pumped to Shanganagh Waste Water Treatment Plant (WWTP) for treatment.

Surface Water

Run off from the existing site is collected by land drain and routed through the existing pond at the south-centre of the site. From there out flow is carried by another land drain and connects a ditch at the south eastern corner of the site in the adjacent Shanganagh Park. The drain runs south through the park and then continues through adjacent lands ultimately connecting to the Crinken Stream.

It is proposed to collect run off from the development site via gravity drains and discharge to the ditch in Shanganagh Park. Flow from the development will be attenuated to ensure that greenfield runoff is maintained.

A variety of SuDS measures will also be adopted on the site. Relatively small volumes of rainwater collected on the respective SuDS devices will enter the gravity drains during typical low intensity storms. The SuDS processes decrease the impact of the development on the receiving environment by providing amenity and biodiversity in many cases. The specific measures adopted for the proposed development comprise, green roof across 60% of the roof; landscaping; pervious paving; rain gardens; use of existing pond; and swales.

Water Supply

The existing site is served by a 100mm diameter main which runs through the site connecting the castle building which is located to the east of the site. This pipe is connected to an existing 150mm diameter pipe which runs along Dublin Road to the west of the site. A pre-connection enquiry was made to Irish Water, and it has been confirmed that subject to agreement, the connection of the development to the Irish Water network can be facilitated. They require that the new site main be connected to a new 355mm diameter main which was laid on Dublin Road in 2019. Continuity of supply for the castle building will be maintained via a connection to the new site main.

4.8 Energy Strategy

The strategy for sustainable design uses robust, passive, cost effective measures to create a more efficient and healthier environment within the planned spaces. The development provides an opportunity to create environmentally sound and energy efficient homes by using an integrated approach to design, planning, construction and operation.

The design strategies employed include a whole life cycle approach to management and planning of the development, energy efficiency with specific focus on reducing the carbon footprint, improving the environmental quality of the building spaces, material selection and use, waste management, water management and conservation and enhancing the ecological value of the site. Key Energy Reduction and Sustainable Design Features include:

- BER minimum of A3, with the majority of units achieving a BER of A2.
- Reduction in Primary Energy compared to a Building Regulation Compliant Residential Building
- Reduction in CO2 Emissions compared to a Building Regulation Compliant Residential Building to Part L 2018 (public consultation)
- Air Tightness Test to achieve 0.6m³/m²/hr an 88% improvement on the Building Regulations advised upper limit figure.
- Thermal Bridging factor 0.04 W/m²K represents calculated thermal bridge details throughout.
- Use of LED Lights. LED lights in the residences and in the Landlords areas.

To achieve the renewables requirement stipulated in TGD Part L, Centralised Air to Water Heat Pumps will be provided. BER Target is NZEB Part L 2019 Compliance. One centralised plantroom is proposed for all of the apartments. The house units will be provided with individual air to water heat pumps.

The ventilation strategy is to use mechanical ventilation with heat recovery (MVHR), meeting all of the supply and extract requirements. Part F will be fully complied with for the entire scheme.

5 no. dedicated ESB sub-stations will be sited in the development to power the entire site. The supply to all buildings, landlord and tenant services will be at low voltage.

5.0 THE NEED FOR DEVELOPMENT

5.1 Population Growth

According to the CSO Census of Population 2016 (CSO) 29% of the Irish population now rent, with higher proportions within the main cities, including Dublin. There is an anticipated growth of 17% in Ireland's population by 2031 with 63% being within the 25-35 age bracket. This significant increase in population for this key age cohort would generate additional demand for new homes, particularly apartments. According to a recent Linesight report (*'The Build-to-Rent Sector in Ireland, Analysis and perspectives from key industry stakeholders'*, November 2018), the BTR model responds to increased demand for secure and longer-term rental properties among the 25-44 age cohorts.

The Shankill Shanganagh Electoral Division (ED) in which the subject site is located had a population of 5,488 no. persons in 2016. This represents a population percentage change of 2.8 per cent or an actual population increase of 154 no. persons from the 2011 Census figures, well below the national average of 3.8 per cent. Whilst the wider Dún Laoghaire-Rathdown area had above average population growth (5%) between 2011 and 2016 the three electoral divisions of Shankill had below average growth rates.

The low population growth, however, has to be considered in the context of a growth in the average household size in the electoral division of Shankill Shanganagh. This growth in household size is higher than the state average, at 2.92 persons in 2016. The low population growth and increase in household size is likely attributable to the lack of available housing in the area and in particular the low delivery of new build units having regard to historical infrastructural deficiencies.

Delivery of the proposed development and the proposed BTR units can address some of this pent-up demand. The BTR model provides benefits to the wider housing market as it can bring more housing units to market quicker and at a greater scale than that of the traditional build to sell model.

5.2 Employment Growth

The ESRI Quarterly Economic Commentary for Spring 2019 states that as the Irish economy is expected to grow over the next two years, further improvements in the labour market are expected. It further indicates that household consumption is expected to continue growing over the next two years. Within the settlement of Shankill (comprising 3 ED's), of the 11,453 people that are eligible for work almost 55 per cent are recorded as being in employment. Within the ED of Shanganagh, employment

levels are high (59%) when compared to the State (53%) and the administrative area of Dún Laoghaire-Rathdown (54%)

The subject lands are ideally located within close proximity to significant employment areas, all accessible by public transport. These employment areas and centres include:

- Bray Town Centre;
- Dublin City Centre (direct DART access from Shankill and future new DART from Woodbrook);
- Sandymount Industrial Estate (11km)
- Stillorgan Industrial Park
- Dundrum Town Centre.

The proximity of the subject lands to these large employment centres, coupled with its accessibility to Dublin City Centre and other employment centres around the M50 and N11 ensures that it is ideally located to attract workers who want to rent in professionally managed schemes that are conveniently located to their place of work.

5.3 Housing Stock & Structure

Of the 1,904 households in Shanganagh ED, 91% comprise a house / bungalow with only 9% comprising a flat / apartment². Most of these units were constructed between 1981 and 1990 with only 215 no. units constructed since 2001. Some 79% of the units are owner occupier with 15% rented from a private landlord and almost 4% rented from the local authority or a voluntary housing authority. It can be concluded that the predominant unit and tenure type in the area is that of an owner-occupied house.

The rate of growth in apartment living has increased at a higher level than that of any other housing type, accounting for 12% of all households nationally in the 2016 census of population. Within Dublin, the rate of growth in apartment living is higher than any other type of housing nationally and witnessed an increase of almost 89% from the 2002 census figures. This indicates that the Dublin apartment market is more buoyant than the remainder of the country with a significant shortfall of supply that fails to meet demand.

According to the Daft.ie Q3 2019 report there were 9,185 new dwelling completions in the first half of 2019. This represents an increase of almost 17% on the same period last year. The number of apartments increased significantly by 55.6%.

These statistics are also reflected at a local scale. The first half of 2019 has seen a continued growth in the number residential planning permissions granted in Dún Laoghaire-Rathdown. Again, this has been driven by apartments, which has seen a 334% increase in units obtaining planning permission compared to H1 2018. Altogether, 1,656 units of this type were granted in H1 2019.

The delivery of apartment units in Dublin is increasing in response to market demand and planning policy. Apartment typologies are becoming the norm and the delivery of 506 no. BTR units as part of the proposed development will further enhance supply on the area. According to Daft.ie, the last rental report, published in August, highlighted that approximately 25,000 new purpose-built rental homes are on the way in Dublin and Cork over the coming five years. These are badly needed in both cities but

² Census of Population 2016

only scratch the surface of true underlying need - which of course is not confined just to Dublin and Cork.

5.4 Rental Market

According to the Linesight Report there is a clear trend in Dublin towards renting in comparison to home ownership. The total numbers of households renting has grown considerably between 2002 and 2016. According to recent census data from the CSO, 29% of Ireland's population is now renting with higher rents within Dublin (36%) and the other main cities.

According to the RTB, the average monthly rent in Q2 2019 in Shankill in Dublin was €1,598. This compares to €1,659 for Dublin as a whole. In terms of the different property types, the average rent paid per month for apartments was €1,389 in Shankill, in comparison to €1,594 for Dublin overall.

Rents in Dublin have continued to rise at a sustained pace, although according to the most recent Daft.ie Rental Report Q3 2019, the average rent is beginning to level off. According to the RTB rental index, rents in Dublin grew 7.1% annually to Q2 2019. Overall, rents in Dublin were 32% higher than their pre-crisis peak.

Now more than ever there is a need for affordable housing and rental units. The proposed development at Shanganagh seeks to provide for more affordable units and increase the supply of rental apartment units in an otherwise dominant owner-occupied housing market.

6.0 PLANNING CONTEXT AND POLICY

There is significant policy at national, regional and local level which supports the development of a high-density residential scheme at this location. The proposed development has been carefully considered and designed in the context of such policy and guidelines.

The following outlines high level planning policy of relevance to the future development of the subject lands. The policy is reviewed from a general residential perspective without necessarily having regard to the proposed Build to Rent (BTR) Model. A separate report, "Sustainable Residential Development & BTR Justification" has been prepared by HRA Planning chartered town planning consultants in support of that particular element of the development proposal and accompanies the application for approval.

6.1 Strategic Planning Policy

National Planning Framework

The National Planning Framework (NPF) published in February 2018 sets out a strategic development strategy for the country up to 2040. Amongst its key messages is the need to provide the highest possible quality of life for people and communities via well designed and managed built and natural environments. It highlights that this will also require significant greenfield development, on sites that can be integrated with the existing built up area of the city and serviced by high capacity public transport. The NPF sets high level planning objectives for Dublin in order to meet the national objectives including the delivery of key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro Link, DART expansion and the LUAS green line link to Metro Link. The emphasis within the NPF with regard future development relates to managing the sustainable growth of compact cities, towns

and villages to achieve effective density and consolidation supported by effective public transport infrastructure.

The NPF provides for a number of National Policy Objectives (NPO) which must be adhered to in the advancement of development throughout the State. The NPF seeks to *“deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements”* (NPO 3a) and seeks to *“deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints”* (NPO 3b).

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

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

NPO 33 seeks to *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

The proposed development complies with a number of the NPO's within the NPF with particular regard to development within the existing built up footprint of a settlement. The proposed development is strategically located on residentially zoned greenfield lands. The site is serviceable and well connected to the road network. The site has been identified as a prime location for future residential development at a sustainably high density. A future train station is proposed on land south of the subject site on the existing line between Dublin and Bray and a BusConnects corridor is proposed along the Old Dublin Road (R119) to the west of the site. This will result in the site being within a 10 minute walk of high frequency public transport.

The proposed scheme features a variety of dwelling types designed to a high standard, and with easy access to a wide range of amenities of which future residents can avail including Shanganagh Public Park located directly to the south of the site. It is submitted to the Board that the proposed development is wholly compliant with the policies of the National Planning Framework.

Rebuilding Ireland – Action Plan for Housing and Homelessness

The Woodbrook – Shanganagh site was identified as a 'Major Urban Housing Delivery Site' by the Department of Housing Planning Community and Local Government (DHPCLG) under Pillar 3 - Building More Homes of the Government's "Rebuilding Ireland – an Action Plan for Housing and Homelessness".

It envisaged the delivery of 1,500 units in the medium term, with a potential total yield of 2,300 units. The intention at the time was that these sites would be advanced for fast track housing delivery, within the context that they can often need additional investment and co-ordination to get development underway.

Sustainable Urban Housing: Design Standards for New Apartments 2018

The *Sustainable Urban Housing: Design Standards for New Apartments 2018* seek to promote high density and high quality apartment developments on residentially zoned land in appropriate locations in line with the above referenced NPF. The Guidelines acknowledge that apartment developments are most appropriately located within urban areas and that the scale and extent of apartment development should increase in relation to proximity to core urban centres.

The subject site would appear to be most akin to a “Central and/or Accessible Urban Location” as per the Guidelines, located on residential zoned land within 400m from the Dublin Road (bus stops) and 800m (10 minute walking distance) across Shanganagh Park from the proposed new DART Station. The provision of the planned DART Station at Woodbrook will provide direct access to the Suburban Rail Network and wider heavy rail network as defined in the NTA’s Transport Strategy for the Greater Dublin Area. The Guidelines confirm that these locations are generally suitable for higher density developments, comprising wholly of apartments in more central locations. The proposed development provides for 597 no. units on a site of 9.69 hectares resulting in a gross density of 62 dwellings per hectare or a net density of 85 dwellings per hectare when the Dublin Road, Woodland areas and proposed greenway link are deducted from the overall site area. The proposed development therefore complies with the requirement for higher densities and the need for greater apartment living.

Section 2.23 of the Guidelines note that publication of The National Planning Framework (NPF) has signaled a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance-based standards to ensure well-designed high quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in Development Plans, should be replaced by performance criteria, appropriate to location.

Sustainable Residential Development in Urban Areas Guidelines 2009

The Sustainable Residential Development in Urban Areas Guidelines 2009 advocate the use of ‘Universal Design’, whereby a development is accessible and usable by as many people as possible, regardless of abilities or age. National policy makes it clear that sustainability is not confined to the physical environment. Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality.

In this regard, the Woodbrook – Shanganagh Local Area Plan 2017 – 2023 (LAP) considers the holistic development of the subject lands and the neighbouring Woodbrook lands to the south in the context of necessary and proposed infrastructure with a view to creating an attractive and walkable residential neighbourhood with high-quality residential, community, civic and recreational amenities. The proposed development has been advanced in the context of the LAP. In addition to the proposed residential units, provision shall be made for a childcare facility on site, a local retail unit and cafe. A Masterplan has been prepared to elevate Shanganagh Park to Regional Park status serving a wider hinterland with sports and community facilities, whilst a steering group has been assembled to advance community & recreation proposals for Shanganagh Castle in the future.

The Guidelines encourage the sustainable and efficient use of land and seek to ensure that sustainable travel patterns are encouraged. It recommends a number of qualitative standards regarding open space provision, design, accessibility, shared use and SUDs. All of these elements have been incorporated into the proposed design approach. Whilst some 39% (3.31 hectares) of the site has been allocated to open space, it is the quality of that open space which is considered to be most important. In this regard

the landscaping plan seeks to enhance the quality of open space whilst retaining the landscape demense and providing for local pocket parks and play facilities. Further Shanganagh Park will provide significant recreational and sporting facilities adjoining the site.

Section 5.8 of the Guidelines seeks to maximise the return on public transport investment, and states that it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors. It recommends that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station and in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors. The proposed development with a gross density of 62 dwellings per hectare and a net density of 85 dwellings per hectare is well above such minimum densities.

Urban Development and Building Heights – Guidelines for Planning Authorities 2018

The Urban Development and Building Heights – Guidelines for Planning Authorities 2018 recognises that our cities and towns must grow upwards and not outwards. Overall there is a presumption in favour of buildings of increased height in town/city cores and in other urban locations with good public transport accessibility.

Section 2.3 of the Guidelines states that *“increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability. Accordingly, the development plan must include the positive disposition towards appropriate assessment criteria that will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development”*.

Section 3.6 of the Guidelines states that development should include an effective mix of 2, 3 and 4-storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets. The proposed development comprises a mix of 2 - 6 stories with a seventh storey set back on one building fronting the Dublin Road. The development is within a parkland setting and within the curtilage of a protected structure, Shanganagh Castle.

The Guidelines state in Chapter 3.0 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. These broad principles are assessed in the context of the proposed development.

Broad Principle	Response
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 subject site comprises a zoned site for residential use in the Woodbrook – Shanganagh Local Area Plan, adjoining existing residential development within 400m of a bus stop, 900m of a proposed DART Station, 1.4km of the town centre and within 1.2km of 3 no. primary schools. The proposed development positively assists in securing NPF objectives relating to development on public

	transport nodes and facilitating compact growth within existing settlements.
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?	The LAP was adopted in 2017 in advance of these Guidelines. However, the development is proposed in line with the general requirements and priorities of the LAP. The massing strategy within the proposed development generally accords with the detailed provisions of the LAP, as provided for within Objective SC5.
Where the relevant development plan, local area plan or planning scheme 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 pre-existing policies and objectives of the LAP do not conflict with the objectives and policies of the NPF. Accordingly, this third issue does not necessarily apply.

Table 3.1 Compliance with Broad Principles in Building Height Guidelines

Section 3.2 of the Guidelines states that the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:

Criteria	Satisfaction with Criteria
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 currently well served by public bus connections with a bus stop fronting the site on Dublin Road. The site is also within 2.1km of an existing DART Station. A new DART station is proposed within (900m) of the site at Woodbrook and there are proposals for an enhanced bus network in the area with BusConnects Pedestrian and bicycle links between Woodbrook and Shanganagh are to be facilitated through the existing park.
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.	The proposed development has been assessed in the context of the surrounding landscape and its cultural heritage setting. A landscape and visual assessment has been undertaken and is contained within Chapter 14.0 of the EIAR, whilst the cultural setting and key landmarks have been assessed in Chapter 13.0 under the title Architecture and Cultural Heritage. The Architectural Design Statement prepared by ABK and accompanying the application for approval demonstrates how the development has been successfully integrated into the existing landscape demesne.
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.	The proposed development has sufficient variety in scale and form to respond to the scale of neighbouring 2 storey developments. In this regard the development decreases in scale towards the northern site boundary to two storey form, increasing in scale on approach to the parkland setting. The scale also increases fronting the public road contributing to its visual presence. Importantly, the form and scale of the

	development has been guided by existing policies and objectives within the LAP.
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 development has been designed in accordance with the design framework principles set out in the adopted LAP. It respects the setting of the castle (see Chapter 13.0 of the EIAR) and overlooks the parkland setting of Shanganagh Park. It opens up this part of the parkland to the public and provides the opportunity for the redevelopment and reuse of Shangnagh Castle in the future.
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 proposed development has been effectively broken into 8 distinct blocks with traditional two storey typologies fringing the northern site boundary. The materials and building fabric have been well considered and are detailed in the Architectural Design Statement.
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 <i>"The Planning System and Flood Risk Management – Guidelines for Planning Authorities"</i> (2009).	The site is not subject to flooding and is situated removed from marine frontage. The site does however adjoin Shanganagh Park, an area subject to significant redevelopment proposals to enhance recreation and sports provision. The scale of development increases to overlook and naturally police the adjoining parkland insofar as possible. As well as preserving part of the landscape demense through enhancement of the pond, the proposed development provides for a new Urban Square and enhanced connectivity through the parkland
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 development breaks from the monolithic two storey form of the adjoining Castlefarm development and sensitively introduces scale into a suburban area which traditionally was planned around low density development. The adjoining parkland provides an opportunity to increase scale whilst at the same time respecting neighbouring two storey form and Shangnagh Castle.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The predominant house type in the area comprises 2 storey own door residential units. There are limited apartment typologies and the proposal positively contributes to the mix of dwelling typologies in this regard.
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 blocks are modulated to maximise access to natural daylight. Apartment buildings have been carefully positioned to ensure no overshadowing and loss of light to the adjoining two storey residential units in Castlefarm
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's <i>'Site Layout Planning for Daylight and</i>	Appropriate regard has been had to relevant standards thereby ensuring that the proposed buildings do not adversely impact on third party properties or within the scheme of development itself. The Daylight & Sunlight Assessment which has influenced the design of the

<i>Sunlight</i> (2nd edition) or BS 8206-2: 2008 – ‘ <i>Lighting for Buildings – Part 2: Code of Practice for Daylighting</i> ’.	scheme is detailed within the Architectural Design Statement.
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.	This criterion is not applicable. The Architectural Design Statement prepared by ABK Architects justifies and rationalises the design approach.

Table 3.2 Compliance with Development Management Criteria – Building Height Guidelines

6.2 Regional Planning Policy

Regional Spatial and Economic Strategy for the Eastern & Midland Region

The Regional Spatial and Economic Strategy for the Eastern & Midland Region (RSES) sets out a twelve year strategic development framework for the Eastern and Midland Region. It establishes a broad framework for development and the way in which society, environment, economy and the use of land should evolve and works towards a broad vision of the Region’s future, identifying key priorities for investment.

The Metropolitan Area Strategic Plan (MASP) for Dublin Metropolitan area sets out large scale strategic residential, employment and regeneration development opportunities and any infrastructure deficits or constraints that need to be addressed. It seeks amongst other things, to target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including expansion of the DART and its facilities. The MASP specifically identifies the North – South Corridor (DART Expansion) as growth facilitator and states that the DART Expansion Programme will increase capacity to support ongoing development of lands to the south to Woodbrook – Shanganagh. The MASP further supports rail infrastructure at Woodbrook (RPO 5.2). The MASP states that the North – South Corridor, inclusive of Shanganagh and Woodbrook has a population capacity of 31,000 in the short term.

A dynamic approach to land-use within the footprint of existing settlements is sought by the RSES in order to maximise the opportunity of urban regeneration and infill sites to contribute to sustainable compact growth and revitalisation of existing settlements of all scale. The RSES supports infill development and the regeneration of key sites with higher densities through the provision of a number of key objectives including:

- Objective RP05.4 which seeks, *“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 B=Housing: Design Standards for New Apartment Guidelines; and Urban Development and Building Heights Guidelines for Planning Authorities*
- Objective RPO5.5 which states that *“future residential development within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner.....”*.

The RSES confirms that Shanganagh – Woodbrook, within the Dublin Metropolitan Area has been strategically planned for development at a regional level, with its development planned having regard to integrated land use and transport uses and infrastructure.

Greater Dublin Area Transportation Strategy 2016-2035

Colloquially referred to as '2030 Vision' this strategy sets out an integrated and balanced sustainable transportation framework for the wider Dublin Region and embraces all sustainable travel modes (walking, cycling, bus, rail and Luas) and road transportation and seeks to address such issues as road safety, traffic management, accessibility, social inclusion and guidance on complementary land use policies.

It sets out a strategy for heavy rail infrastructure that is proposed to be delivered up to 2035. In this regard it seeks to implement the DART Expansion Programme an initiative that will create a full Metropolitan area DART network for Dublin with all of the lines linked and connected. This integrated rail network will provide the core high capacity transit system for the region and will deliver a very substantial increase in peak-hour capacity on all lines from Drogheda, Maynooth, Hazelhatch and Greystones.

In relation to heavy rail and light rail infrastructure projects, the design of these projects will future-proof their ability to serve the needs of the region for the long term.

6.3 Local Planning Policy

Dún Laoghaire-Rathdown County Development Plan 2016 - 2022

In the Dún Laoghaire-Rathdown County Development Plan 2016 - 2022 (CDP) Shanganagh - Woodbrook is identified as a future development area in the core strategy settlement structure. The CDP states that there is potential for an additional 2,300 residential units in Woodbrook – Shanganagh having regard to the extent of land that is zoned.

The CDP references land located in the greenbelt area between Bray and Shankill that are within a major multi-modal transport corridor which includes the M11 which can be easily accessed and which, in turn, provides access to the M50. The lands referenced include the subject lands at Shanganagh. The CDP references the Old Dublin Road QBC which fronts the development lands and the DART line, with proposed access from a planned new station at Woodbrook, in proximity to the subject lands.

The CDP proposes a neighbourhood framework based on the provision of a high-density urban form that maximises the use of existing and proposed transport infrastructure and aims to reduce the need to travel. It states that two distinct urban nodes are proposed - one at Woodbrook, which includes a new neighbourhood centre, and the second at Shanganagh Castle which will essentially be a reinforcement of the existing urban form immediately to the south of Shankill village. It confirms that the lands, when fully developed, will accommodate an additional 5,000 to 6,000 persons in approximately 2,000 to 2,300 units. These figures are based on net densities of 80 to 100 units per hectare at Woodbrook and 65–75 units per hectare at Shanganagh Castle. Objective 54 of the CDP seeks to implement and develop the lands at Woodbrook and Shanganagh in accordance with the Woodbrook/Shanganagh Local Area Plan.

Policy RES5 facilitates development on institutional lands stating that it is Council policy to retain the open character and/or recreational amenity of these lands wherever possible. Policy RES7 encourages the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided whilst Policy RES9 supports the concept of independent and/or assisted living for older people and people with disabilities/mental health issues.

In relation to Table 2.2.5 Shanganagh Road is included in the six year road objectives programme although the extent of works proposed to Shanganagh Road is not detailed.

Policy OSR8 states it is the Council's policy to develop a comprehensive network of County Greenways linking parks and public open spaces and to liaise with adjoining local authorities and other stakeholders to achieve and improve wider external linkages and corridors. A greenway route from Shanganagh Park to the coast has been identified and a phased programme of works is being initiated,

Policy EL3 requires that a Sustainable Drainage System (SuDS) is applied to any development and that site-specific solutions to surface water drainage systems are developed.

Policy CC6 of the CDP seeks to promote innovative building design that demonstrates a high level of energy conservation, energy efficiency and use of renewable energy sources in existing buildings, whilst Policy CC7 seeks to ensure that all new buildings will be required to meet the passive house standard or equivalent, where reasonably practicable.

Chapter 6.0 deals with built heritage and is particularly relevant given the presence of Shanganagh Castle, a protected structure and building listed on the National Inventory of Architectural Heritage (NIAH). In terms of archaeology the CDP seeks to preserve archaeological material in situ (Policy AH2). Policy AR1 seeks to protect structures included on the RPS from any works that would negatively impact their special character and appearance. Policy AR5 seeks to retain, where appropriate, and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of a streetscape

Chapter 8.0 defines a number of development management standards for residential development and institutional lands. Of note a minimum open space provision of 25% of the total site area will be required on Institutional Lands. This provision must be sufficient to maintain the open character of the site - with development proposals built around existing features and layout, particularly by reference to retention of trees, boundary walls and other features as considered necessary by the Council. The proposed development maintains a minimum 39% of the site as open space. The overall site has been influenced by standards detailed in Chapter 8.0 and every effort has been made to ensure that all standards, in so far as being relevant, are complied with.

Chapter 9.0 of the CDP lists a number of Specific Local Objectives (SLO) relating to the Woodbrook – Shanganagh Local Area Plan area as follows:

SLO	Specific Local Objective Text
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- | | |
|-----------|---|
| 54 | To implement and develop the Woodbrook and Shanganagh area in accordance with the Woodbrook/Shanganagh Local Area Plan. |
| 56 | To investigate the potential upgrading of the Wilford Interchange to provide connectivity to lands west of the M11 and Old Conna Village with any such improvements to be informed by the outcome of the TII's on-going Corridor Studies. |

- 61** To encourage the development of a crematorium at Shanganagh Cemetery.
- 66** To provide pedestrian/cycle access across the M11 corridor at Allies River Road.
- 76** To continue the development of Shanganagh Park in accordance with the Masterplan, and to develop a sports facility and improved recreational facilities in the park.
- 93** To promote the development of the S2S Promenade and Cycleway as a component part of the National East Coast Trail Cycle Route. It should be noted that these coastal routes will be subject to a feasibility study, including an assessment of the route options. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated SACs, SPAs, and pNHAs in Dublin Bay and the surrounding area.
- 105** To investigate, in consultation with the Department of Education and Science, the reservation of a single site for a Post-Primary School to serve the growth nodes of Woodbrook/Old Connaught areas. Note: The locations of SLO symbol 105 on Map 14 are notional only and not a geographic identification of specific sites.
- 127** To provide a DART Station at Woodbrook.

Many of these objectives are currently being implemented, including objectives 54, 61, 76, 105 and 127 and which have significantly influenced the approach to development on site.

The land use zoning objectives as set out within Map 10 and 14 of the CDP affords Zoning Objective A1 to the land, which seeks “*to provide for new residential communities in accordance with approved local area plans*”, whilst Shanganagh Park and Cemetery are zoned Objective – ‘F’: “*To preserve and provide for open space with ancillary active recreational facilities*”. A ‘H’ symbol has also been afforded to the subject site, which is indicative that the subject land has been identified as a County Council Housing Programme Site.

Woodbrook – Shanganagh Local Area Plan 2017 - 2023

The Woodbrook – Shanganagh Local Area Plan (LAP) identifies two discrete development parcels including lands at Shanganagh Castle and Woodbrook – incorporated within a wider environs. The LAP area is identified within the County Development Plan Core Strategy as a ‘Primary Growth Node’ and also as a ‘Major Urban Housing Delivery Site’ by the Department of Housing Planning and Local Government (DHPLG). It is an objective of the Council to unlock the potential and accelerate the delivery of housing on Woodbrook-Shanganagh, working in collaboration with all relevant stakeholders (Objective H1); to promote sustainable higher densities and quality innovative housing designs (Objective H2); and to promote high quality homes and quality residential choices for a range of household needs (Objective H3).

The LAP acknowledges that the area is predominately made up of green and open spaces given the co-location of Shanganagh Park and Woodbrook Golf Club surrounded by extensive tracts of greenbelt lands. A key aim of the LAP is to protect and enhance the existing open spaces for both biodiversity and recreational use. Shanganagh Park is presently identified as a ‘Gateway Park’ within the County’s Green Infrastructure Strategy, offering football pitches, walking routes, play facilities and a dog park. The LAP states that the forthcoming Masterplan for the park will further improve the facilities and amenity value of the park as well as enhancing its natural ecosystems and biodiversity (Objective OR2). A key element in maximising the future potential of the Park is to provide and improve pedestrian/cycling and green/biodiversity corridors through the Park and between each of the development parcels. In

this regard a Parks Masterplan has been approved by Council, which seeks to elevate the parks status to regional level with enhanced provision of community, recreation and sports facilities.

Other objectives in the LAP seek to develop a sports campus, expanding on the existing sports facility at the Castle and to deliver greater recreational opportunities for existing and new residential communities and for the wider area (Objective OR9). In this regard a multi-disciplinary steering group has been assembled to manage the integration and refurbishment of the Shanganagh Castle and building. Currently the team is gathering site / building analysis information and is developing a strategy of reuse and integration for the Castle and its building that accords with the objectives of the Local Area Plan in the context of the wider community, the proposed Shanganagh residential development and the surrounding high amenity park lands.

Having regard to the location of the park adjoining the subject site, the LAP considers that it may be appropriate to relax new public open space quantum requirements. Notwithstanding this relaxation, each development parcel will be required to provide a minimum of 15sqm of public open space per person or in default 10% of the total site area to consist of high quality public/communal open space. In this regard the proposed development exceeds open space requirements as it provides 3.31 hectares of public open space.

The LAP acknowledges that the success of the area is dependent on the availability of a good range of accessible, high quality community facilities and amenities. It states that future residential communities within the LAP area will require commensurate social infrastructure that can remain viable. It recognises that Shanganagh Castle offers an excellent opportunity to create both indoor and outdoor community space which could include a heritage function. Objective S3 of the LAP seeks to restore / rehabilitate Shanganagh Castle, as appropriate and feasible, with the provision of an appropriate mix of publically accessible community focused uses. In the interim and until such time as Shanganagh Castle falls into the ownership of the applicant and a comprehensive plan is put in place, the proposed development provides for a playground, new public Square, woodland walks and kick about areas.

Further, in accordance with Objective BH3, the proposal seeks to ensure that the architectural and historic significance of Shanganagh Castle is protected, conserved and enhanced, through the sensitive design and siting of the residential units

The LAP acknowledges that the Site Framework Strategy seeks to re-instate key views to and from Shanganagh Castle. The woodland and the pond west of the Castle are the most significant remains of the original landscaping scheme as shown on the 1837 OS Map (See Map 12) and these have been conserved and enhanced as part of the development proposal.

A site framework strategy is contained within the LAP consisting of:

- A series of Guiding Principles,
- Key Site Objectives for urban design, density, land-use, public realm and open space, community facilities and infrastructure
- A plan layout of the site which sets out the location of key routes, open spaces and facilities, and an indicative block layout (Site Framework Map).

The site framework strategy has provided the guiding principles for the proposed development and the scheme has been designed in full accordance with those principles. Careful consideration has been

given to the emerging network of pedestrian and cycle linkages, to ensure that it positively contributes to and improves linkages and connectivity.

Density has been influenced on site having regard to Section 5.2.5 of the LAP and the NTA's Strategy relates to the DART Expansion Programme. Woodbrook is one such site identified as a location on the South-Eastern Line. Objective T3 of the LAP seeks the early delivery of the planned DART Station in order to establish sustainable commuting and travel patterns at the outset as an integral element of a newly emerging sustainable community. Further, the NTA's 2016-2035 Transport Strategy for the Greater Dublin Area makes provision for extension of the Luas Green Line from Cherrywood to Bray Environs as part of the longer-term strategy for Light Rail Network. It is acknowledged, however, that any extension of the Luas from Cherrywood will be contingent on, and subsequent to, the Luas Green Line being upgraded to Metro in order to provide the necessary passenger capacity, as set out in the NTA Strategy. The CDP (Table 2.2.4) and the LAP (Objective T4) also identifies an interchange between Suburban Rail (DART) and QBN (Quality Bus Network) at Woodbrook, as one of primary public transport interchanges to be developed in the County during the lifetime of the Plan

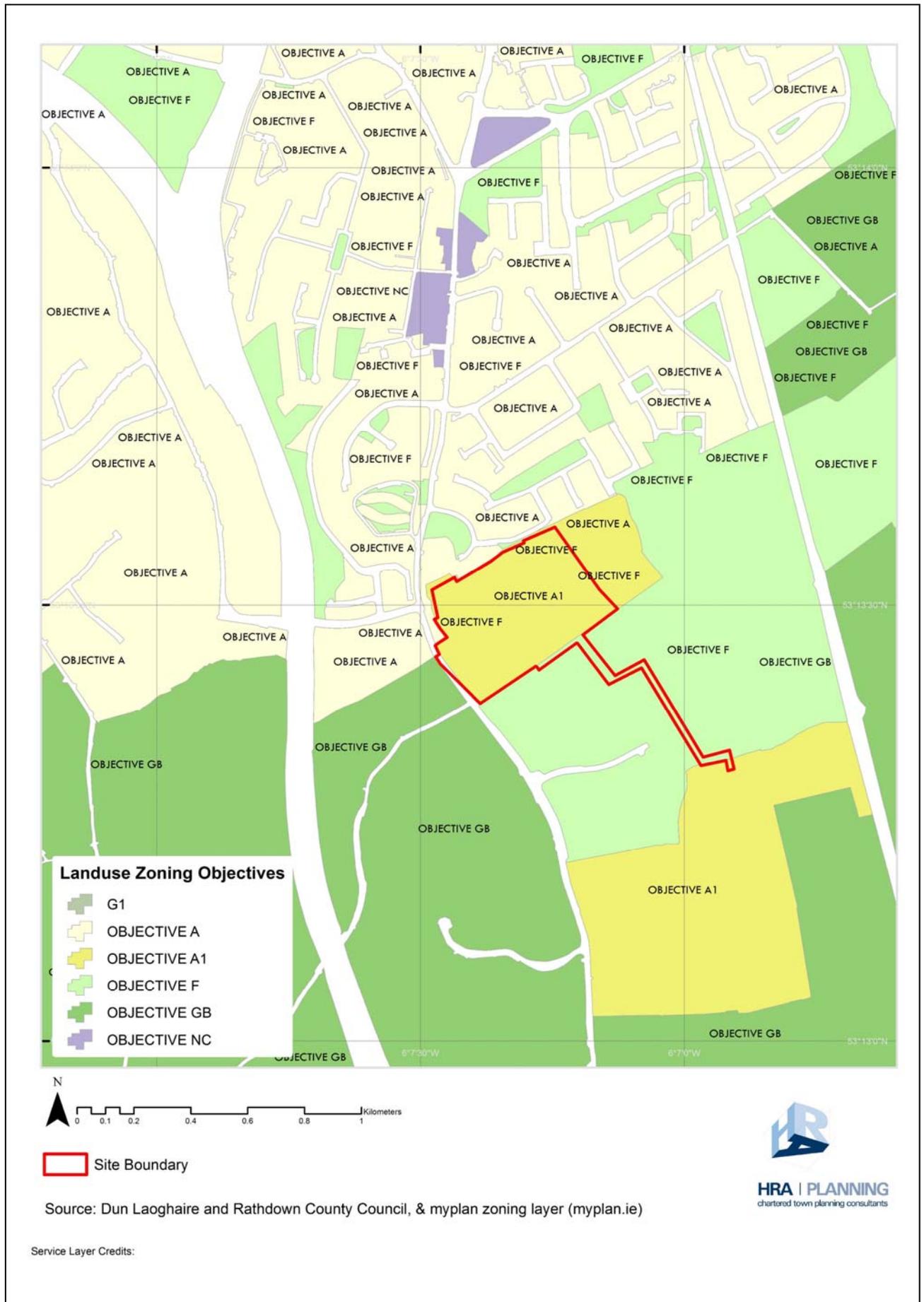


Figure 6.1 Extent of Zoning Afforded to the Land

7.0 ASSESSMENT OF DEVELOPMENT

7.1 Principle of Development

The proposal, as presented, adopts a plan-led approach to development whilst also having regard to national guidelines.

The land use zoning objectives as set out within Map 10 and 14 of the Dún Laoghaire-Rathdown County Council Development Plan 2016 – 2023 (CDP) affords Zoning Objective A1 to the land, which seeks *“to provide for new residential communities in accordance with approved local area plans”*, whilst Shanganagh Park and Cemetery are zoned Objective – ‘F’: *“To preserve and provide for open space with ancillary active recreational facilities”*. A ‘H’ symbol has also been afforded to the subject site, which is indicative that the subject land has been identified as a County Council Housing Programme Site.

The CDP identifies Woodbrook as a future development area in the core strategy settlement structure stating the potential for an additional 2,300 residential units in Woodbrook – Shanganagh having regard to the extent of land that is zoned. The Woodbrook – Shanganagh Local Area Plan 2017 – 2023 (LAP) further supports this approach and puts in place the necessary design and delivery parameters to guide development on the subject site. It is these design and delivery parameters that have heavily influenced the design approach to development on the site.

Residential development on the subject site has significant support at national, regional and local level. Identified as a ‘Major Urban Housing Delivery Site’ by the Department of Housing Planning Community and Local Government (DHPCLG), the site was earmarked for the provision of 1,500 units in the short term.

The planning policy assessment undertaken in Section 7.0 of this report demonstrates how the proposed development is concurrent with land use planning and strategic planning at national, regional and local level. The documents confirm that the proposed residential development will contribute to the economic and sustainable development of the region. The planning policy assessment therefore brings forth the conclusion that the location, nature and function of the proposed development is in accordance with relevant plans and policies and should as a result be deemed acceptable in principle at the proposed location.

7.2 Suitability of Location

The site, originally part of the historic Shanganagh Castle Demesne makes up part of a swathe of landscape including Shanganagh Park, Shanganagh Cemetery and Woodbrook Golf Course, that extends from the Old Dublin Road to the Shankill Beach. The site is in the immediate grounds of Shanganagh Castle, an 18th Century house built in 1769 and extensively remodelled by Architect Richard Morrison in Georgian Gothick idiom of the day. The Castle is a protected structure RPS no 1845 NIAH No 60260146.

It is the sensitivity of the site from a cultural heritage, landscape and biodiversity perspective that has influenced the overall design approach, with a focus on the retention and enhancement of the remains of the original picturesque parkland. The original historic components of the parkland landscape, namely the woodland stands, pond, historic trees and historic access approach form the framework of the development intervention. Furthermore, the principals of parkland landscape design within the new

scheme have been reinterpreted through the creation of vistas, a sequence of spaces being revealed as one traverse the scheme and an alignment of the species that exist on site.

A strategy of tree retention, replacement and planting has influenced the overall development proposal, informed by an Arborists Report accompanying the development proposal and detailed in Appendix 2.2 of the EIAR. The LAP, Map 3 indicates 'tree' symbols where trees/copses are to be protected and preserved as follows:

- Cope of trees north-east of the gate lodge (in and around tree tag no. 600);
- Trees in the planted woodland east of the pond (in and around tree tag no. 700);
- Tree(s) on the pond island (no tree tag no.); and
- Tree tag no. 616 (a mature Scots pine)

It is proposed to retain these trees and incorporate them within the development proposal save for the mature Scots pine (tree tag no.616) which must be removed due to its poor condition. Further, although the tree on the pond island has been deemed dead its removal is not proposed as it provides a positive habitat for habitat in the pond and surrounding area. The Arborist Report details all trees to be removed, retained and managed on site and provides information on the trees, age and condition. Whilst the removal of some trees are necessary to facilitate the development proposal, a comprehensive strategy of tree planting, replacement and management is proposed an integral part of the overall development proposal.

The development of distinct character areas across the scheme has been central to the overall design proposal and this is detailed further within the Architectural Design Strategy. These character areas function as part of a site-wide built and landscape architectural framework, ensuring suitable screening, visual and aesthetic interest, recreation and integration of the proposed development into its adjoining environs.

In accordance with the public open space requirements set out in the CDP, provision has been made for in excess of the 15sqm of public open space per future resident, based on 3.5 persons per 3 bed unit and over; and 1.5 persons per 2 bed unit and under. Whilst the CDP requires 1.61 hectares of public open to serve the development, the proposed development provides for 1.76 hectares within the net development area. However, in reality the proposed development provides for significant more open space when one takes account of the additional 1.54 hectares located within the red line boundary and which remains undisturbed. Given the sensitive nature of environmental elements within the site including mature woodlands, the pond and existing trees and hedgerows, the proposed development in reality provides for 3.3 hectares of open space. This equates to 34 per cent of the overall site identified in red or 39 per cent of the site excluding the Dublin Road and the proposed greenway. Such provision is in direct response to the demesne landscape setting.

Overall, the development proposal aims to integrate the proposed development within the setting of a historic landscape, in full acknowledgement that the proposed new use is resulting in a significant change on the existing landscape. While some components of the historic landscape remain, these features are protected, retained and incorporated into the design of the proposed development to form an integral part of the future character, identity and placemaking for the site. The overarching design intention seeks to create of a strong sense of place and identity for this new residential community, whilst also respecting the historic sensitivities and heritage of the site.

7.3 Density

The number of units proposed within the overall development seeks to accommodate higher density development on site in accordance with national, regional and local policy. The proposed development results in a net residential density of 85 no. units per hectare based on a net site area of 7.03 hectares.

The provision of the DART Station and Bus Connects (along the Old Dublin Road – R119) will provide substantially increased public transport connectivity to the site. The detail of the transportation policy context is set out in the Traffic and Transport Assessment and Travel Plan, both prepared by Punch Consulting Engineers. The following national planning policy context sets out the aspirations to generally increase densities on sites which benefit from higher levels of public transport.

The *National Planning Framework (NPF)* sets out a number of National Policy Objectives (NPO) that seek to ensure that the overriding intent of the NPF is delivered, including: -

- National Policy Objective 2a - *“A target of half 50% of future population and employment growth will be focused in the existing five Cities and their suburbs”.*
- National Policy Objective 3b - *“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”.*
- National Policy Objective 11 - *“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”.*

The *Regional Spatial Economic Strategy (RSES)* identifies Shanganagh as one of a number of strategic sites, located along the strategic North – South Corridor that will benefit from increased capacity on the DART Line planned by 2027. It states that, *“The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate. On the south eastern commuter line capacity is unlocked by a new station at Woodbrook - Shanganagh, with the consolidation and westward expansion of Bray to Fassaroe and Old Conna linked to improved public transport connections.”*

Section 5.8 of the *Sustainable Residential Development Guidelines (2009)* recommends that: - *“...in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations, bus stops, and decreasing with distance away from such nodes”.*

Having regard for the location of the subject site, it is considered that under the provision of the *Sustainable Urban Housing: Design Standards for New Apartments (2018)* it is most appropriately defined as an ‘Intermediate Urban Location’. The locational attributes of the site as set out in the Traffic and Transport Assessment, prepared by Punch Consulting Engineers which have a bearing on car parking quantum. Residential density greater than (>) 45 dwellings per hectare (net) are identified as being appropriate for ‘Intermediate Urban Locations’ where the site is:

- Within 1,000m (10 mins. walking) distance of a principal town or suburban centre or employment location [*N/A - Bray Village is located c.2.8km to the south*].
- Within 1,500m (15 mins walking) distance of high capacity urban public transport stops (commuter rail/light rail) [*Potential for improvements to rail/light rail station located – proposed DART Station*].

- Within 1,000m (10 mins. walking) distance of existing or planned high frequency urban bus service [*Potential for improvements to bus commuting service under Bus Connects*].
- Within 500m (5 mins. walking) distance of reasonably frequent urban bus service (min 15 minute peak hour frequency) [*Potential for improvements to bus commuting service under Bus Connects*].

The *Dún Laoghaire-Rathdown County Council Development Plan 2016 – 2023* sets out that where a site is located within c. 1 kilometre pedestrian catchment of a rail station, Luas line, BRT, Priority 1 Quality Bus Corridor and / or 500 metres of a Bus Priority Route, and/or 1 kilometre of a Town or District Centre, higher densities at a minimum of 50 units per Ha will be encouraged.

The *Woodbrook – Shanganagh Local Area Plan 2017 – 2023 (LAP)* sets out that average minimum net density of 60 no. units per hectare shall apply to the lands at Shanganagh.

Overall, the density proposed, having regard for the future provision of high frequency public transport options in proximity to the site, will ensure that sufficient critical mass is developed on serviceable and highly accessible land in accordance with the objectives of current national planning policy.

7.4 Traffic & Transport

Vehicular and pedestrian circulation within the development consists of:

- The 'Entrance Road' that runs east-west from the Dublin Road to The Square then turns northwards where it meets with the Crescent.
- 'The Crescent', a two-way, perimeter vehicular route that follows the boundary of the site connecting
- The Entrance Road to Shanganagh Castle.
- The Avenue provides a new pedestrian-and cycle-only entrance to the development from the Dublin Road that extends eastwards before crossing the central public space of the development. This 'Avenue' provides a direct vista to the castle.

The proposed development creates a transport hierarchy providing primacy to pedestrians and cyclists through the introduction of shared surfaces, pedestrian-only areas and traffic-calming in accordance with DMURS and current best practice. Vehicular movements are designed to be indirect so as to reduce speed and give primacy to cyclists, pedestrians and the communal activity.

The majority of parking is provided as on-street parallel and perpendicular parking distributed along access roads throughout the development. A car park providing some 58 no. spaces is located immediately off the entrance road to the development.

The proposed development accommodates 365 no. car parking spaces on site and 1,318 bicycle spaces. The car parking spaces provides for 324 no. spaces to serve the residential units; 10 no. visitor car parking spaces; 20 no. spaces for the creche; 8 no. spaces serving the café and 3 no. spaces serving the local retail unit. The bicycle spaces have been allocated with 1,033 no. spaces serving the residential units, 279 no. spaces provided to serve visitors; 4 no. spaces serving the café; 1 no. space serving the creche; and 1 no. space serving the local retail unit.

A reduction in car parking standards has been considered in the context of the LAP and the Apartment Guidelines.

Objective SC13 in the LAP states that

“A relaxation of private open space standards for terraced, semi-detached or detached housing and car parking provision will be considered in order to achieve higher sustainable densities, subject to design and layout”.

The Apartment Guidelines in Paragraph 4.19 states that,

“In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity”.

The location of the proposed development in proximity to Shankill DART Station and bus stops on the Dublin Road associated with the future provision of a new DART Station at Woodbrook and proposed Bus Connects, supports and justifies a significant reduction in car parking provision in this instance.

Providing higher numbers of cycle parking is proposed to mitigate the demand for and result in reduced car parking. The cycle parking provision will generally be in accordance with 2018 Apartment Guidelines and is more than the requirement set out in *DLRCC Standards for Cycling Facilities for New Developments January 2018*.

GoCar, a car sharing facility that allows vehicle rental from a minimum of one hour, have confirmed their commitment to the scheme. A total of 10 Go Car Spaces will be provided at various convenient locations around the site. The GoCar company advise that each GoCar will equate to 15 to 20 privately owned vehicles. Therefore, GoCar parking spaces, suitably located, are an effective mechanism for reducing car parking demand.

8.0 ENVIRONMENTAL IMPACT ASSESSMENT (EIAR)

The proposed development has been subject to environmental impact assessment pursuant to the provisions of Part X of the Planning and Development Act 2000 (as amended) transposed from; the EU Council (Environmental Impact Assessment) Directive 2011/92/EU as amended by 2014/52/EU on the assessment of the effects of certain public and private projects on the environment

Schedule 5 (Part 2) of the Planning & Development Regulations 2001 – 2019 sets mandatory thresholds for each project class and the subject development falls within a project class. The relevant class of development is 10(b)(i) as follows:

Category 10(b)(i) Construction of more than 500 dwelling units.

The proposed development comprises a new residential development, including 597 no. residential units and ancillary supporting facilities, on a site of c. 9.69 hectare. The project exceeds the 500 no. dwelling unit threshold, therefore triggering mandatory EIA.

An Environmental Impact Assessment Report (EIAR) is enclosed with this planning application.

9.0 AA SCREENING of NO POTENTIAL FOR SIGNIFICANT EFFECT

The proposed development has been subject AA Screening pursuant to the provisions of Part X and Part XAB of the Planning and Development Act 2000 (as amended) transposed from; the EU Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

A Screening Report for Natura Impact Assessment is enclosed with this planning application.

The Screening report concludes that there are no Likely Significant Effects on any European site as a result of the Proposed Development, and therefore that there is no requirement to proceed to the next step of Appropriate Assessment and , subject to other requirements, the Proposed Development can be authorised.

10.0 CONCLUSION

In light of the above information and supporting reports and assessments, the proposed development is considered; consistent with strategic national, regional and local policy objectives in terms of residential development; and, consistent with the proper planning and sustainable development of the area.