

Planning Statement

Part 8 Housing Development, Cromcastle Court and Old
Coal Yard, Kilmore Road, Dublin 5

March 2025



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Document status					
Job Number:					
Job Title:					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
0	Draft	SB	JB	JB	
1	Rev for Part 8	SB	SB	SB	

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1. INTRODUCTION

1.1 Background

MacCabe Durney Barnes has prepared this planning report on behalf of Dublin City Council to accompany a Part 8 proposal for the development of 152 residential units and a community facility on a site of 1.63ha at Cromcastle Court and the Old Coal Yard, in Kilmore, Dublin 5.

Part XI of the Planning and Development Act 2000 as amended and the procedures set out in Part 8 of the Planning and Development Regulations 2001 as amended, relate to development by, on behalf of, or in partnership with the Local Authority. Under Section 178 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out its own development, provided it does not materially contravene the Development Plan.

1.2 Overview of Development

The proposed development consists of two adjacent sites and will involve the demolition of three existing four-storey apartment blocks and one-storey welfare depot. It is proposed to construct 152 no. units across seven apartment blocks, a community area of 132sqm, an integrated replacement substation, single storey storage buildings. Communal open space will be provided in the form of courtyards, and a large tract of public open space is designated for the north of the site. Units within this development consist of 118 social housing units at the Cromcastle Court site and 34 units at the Old Coal Yard specifically designated for older individuals' 1-bed independent living units.

The new homes include a mix of 1- and 2-bedroom apartments and- 3 bedroom duplexes. A community facility, integrated replacement substation, and single storey storage buildings are also proposed. The blocks will range between 4 and 6 storeys in height.

Secure bicycle parking and car parking is provided across both sites. Works external to the site boundary are also proposed including the addition of new on-street car parking and road narrowing works to Kilbarron Road and Cromcastle Park.

Landscaping works are proposed to boundaries, ancillary works to landscape housing areas and all necessary associated ancillary works on the site and adjacent areas.

1.3 Structure of the Planning Report

This planning report was prepared to accompany a Part 8 application for residential units, [insert] at Cromcastle Court and the Old Coal Yard. The report is structured as follows:

- It provides a description of the site and surrounding area, and of the proposed development.
- It outlines how the development complies with:
 - National policy,
 - Regional policy
 - Local policy

Planning Statement

- It gives an overview of environmental matters, including ecology, environmental impact assessment and appropriate assessment.

2. SITE LOCATION AND CONTEXT

2.1 Site Location

The Part 8 site is located in Kilmore, Dublin 5. Kilmore is located approx. 5 km from the City Centre. It is broadly located north of Beaumont, east of M50 and south of Coolock. The Oscar Traynor Road links the Malahide Road to the east with the M50 to the west and is located around 260m north of the site. The Northside Shopping centre is located to the north of the Oscar Traynor Road, around 316m north of the site. The Northside Shopping Centre includes two supermarkets, other convenient and comparison retail units, health services and restaurants.



Figure 1: Site Location (Source: myplan)

The Coolock Primary Care Centre is located around 350m north-west of the site on Cromcastle Road.

The IDA Business and Technology Park, Clonshaugh is located around 770m north-west of the site. The Business Park is home to numerous companies and consists of offices and large floorplate buildings, such as warehouses, manufacturing companies, laboratories and data centres.

A sports complex with astro pitches, a playing field, indoor gym and the Oscar Traynor Coaching and Development Centre is located around 800m west. Scoil Fhursa is located just under 400m from the site.

Beaumont Hospital is located around 335 south west of the site. It employs around 3,000 people and caters for 820 beds across 100 departments.



Figure 2: General Location (source: Google Earth)

2.2 Site Description

The Part 8 site is 1.63 ha and forms part of a larger landholding and is located to its south. It is split into two plots. One plot, forming part of the Cromcastle Court estate, is bound by the Kilbarron Road to the south, Cromcastle Park to the west. The overall landholding, known as Cromcastle Court consists of eight no. social housing blocks with a total of 128 no. apartments, all of which are four storeys in height. A welfare depot building is located in the site's eastern portion. Only the southern part is included and includes the open space to the south-east corner of Cromcastle Court, the block facing Kilbarron Road and the block that is accessed from the Kilmore Road. The second plot is located directly across, to the east of the Kilmore Road and is known as the Old Coal Yard. The Old Coal Yard is bound by the Kilmore Road. Access to the Old Coal Yard is to the north. The Aoibhneas Women and Children's Refuge is located immediately to the north of the Old Coal Yard.

The Kilmore Road runs in a north-south direction splits the two sites.



Figure 3: Part 8 site (source: Google Earth)

Cromcastle Court

The lands forming part of the Cromcastle Court estate comprise amenity grassland, three blocks and the welfare depot building. The estate was built in the 1960s. The blocks included in the part 8 have been vacated. The overall landbank comprises of five sub-plots. The plots with access via Cromcastle Park are organised in a similar manner, with a block facing north and another facing Cromcastle Park. These are arranged around an area of surface car parking. A playground is located to the north of each of these. The blocks are rendered with cement and have a flat roof. Generally upper floors are accessed by a central stair core which is external to the main fabric of the building. All units have accessed to private open space in the form of a balcony, located to the rear. The site is relatively flat with a gentle slope toward the south.

There are a number of trees along the southern and eastern boundary and a couple of trees within the open space area. The existing blocks are in poor condition. There are also structural and fire safety issues.



Figure 4: View looking toward the north



Figure 5: Vacated blocks to be demolished

There is no landscaping, save for the trees, or landscape features of note on the site. The site is bound on all sides by a fence over a low brick wall. The surrounding public realm is poor, with an uneven and patchy footpath,

albeit it is relatively wide. Immediately to the west, is Cromcastle Park which comprises of four groups of two-storey terraced houses. Their façade is at least 26m away from the fence bounding Cromcastle Court.

The three blocks are to be demolished in addition to the single-storey welfare depot as can be seen in the figure below.



Figure 6: Single storey structure to be demolished

The size of the Cromcastle Court Part 8 site is around 1.28 ha.

Old Coal Yard

The Old Coal Yard is a vacant site. There are some standing walls and concrete foundations. The standing walls are of masonry construction. There is a small structure which is entirely obstructed by ivy.



Figure 7: Old Coal yard

Aoibhneas house is located immediately north. It is two-storey high. The rear gardens of Tranquility Grove are backing onto the site. Kilmore Court abuts the site to the south. The small estate consists of three pairs of two-storey detached houses. The gable of no.2 Kilmore Court is adjacent to the site. There is a small separation distance between the boundary wall and no. 5 Kilmore Court.

The size of the Old Coal Yard is 0.37 ha.

The Kilmore Road, which crosses the site, is a single carriageway. There is a pedestrian crossing at the junction of the Kilbarron Road and Kilmore Road. There is a raised table in front of nos. 19/21 Kilbarron Road to the south of the site and another on Cromcastle Park, close to the junction with the Kilbarron Road. Both the Kilbarron Road and Cromcastle Park are single carriageways.

2.3 Transportation

2.3.1 Existing

There are two bus stops immediately to the north of the site (no. 1252 and 1253). The former is served by bus lines 27B (Eden Quay to Harristown) and N6 (Finglas to Kilbarrack), the latter by N6.

There are other bus services available on the campus of Beaumont Hospital: 14 (Beaumont to Dundrum), 14c (Beaumont Street to D'Olier Street), 17 (Blanchardstown to Howth Junction – Donaghmede), 27b, 104 (Clontarf Road – Shanard Road). Several of these lines allow to transfer to Luas or the Dart. Bus lines 17A, 27 and 27B also serve the Northside Shopping Centre. The 27 and 27X routes are accessible via the Bunratty Road serving the route from Clare Hall to Johnstown and UCD Belfield.

2.3.2 Bus Connect

Bus Connects additionally notes route 8 along the Kilmore Road which serves Abbey Street, the A1 route along Kilbarron Lane leading from Firhouse and the L82 from Swords. These three routes end at Beaumont Hospital. Routes along the D spine are also accessible.



Figure 8: Extract from the Revised Network 2024: Big Picture Map (Source: BusConnect)

2.3.3 Cycling Infrastructure

Under the Active Travel Programme, Dublin City Council will deliver the Kilbarrack Road to Oscar Traynor Road Scheme. The route will be 5 km long and will go along Kilbarrack Road, Tonglegee Road and Oscar Traynor Road between the Howth Road/Dublin Road junction and Oscar Traynor Road / Barryscourt Road junction. The infrastructure planned along Oscar Traynor Road comprises of a new segregated cycle track on both sides of the road, separating cyclists from traffic by way of flexible kerbs and bollards. The new protected cycle tracks will be 1.5m wide. The scheme will finish at the Northside Shopping Centre.



Figure 9: Planned alignment of the Kilbarrack Road to Oscar Traynor Road Active Travel Route

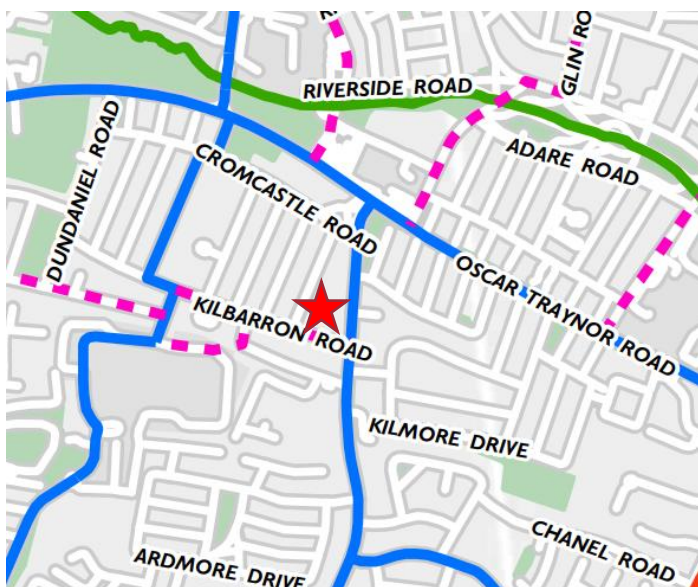


Figure 10: Greater Dublin Area Active Travel Network Plan

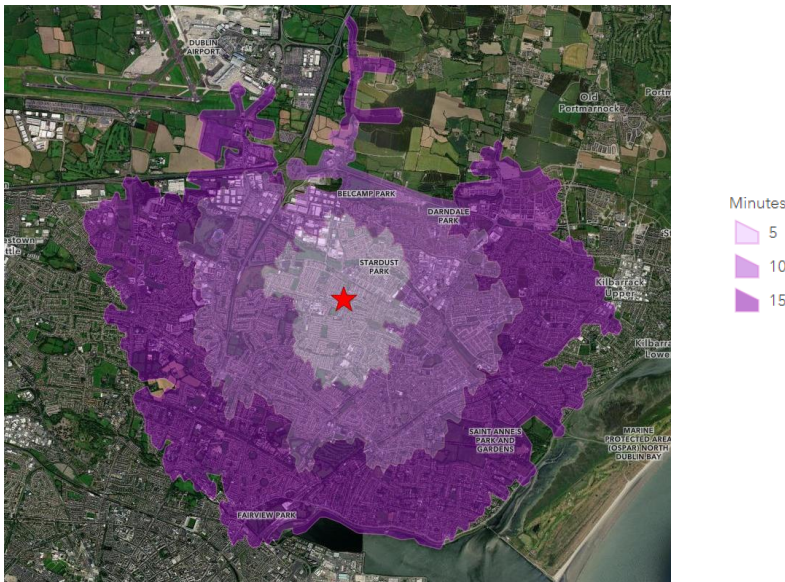


Figure 11: 5, 10 and 15-Minute Cycle Catchments

Phase 3 of the Coolock to Clontarf Active Travel Project extending from Clonshaugh Road to the Artane Roundabout is expected to begin construction in late 2025. This is proposed to run along the Kimore Road adjacent to the site. Public Consultation for Phase 1 was completed in 2023. Proposed improvements under the scheme are inclusive of improved walking and new cycling facilities, school zones and junction improvements.

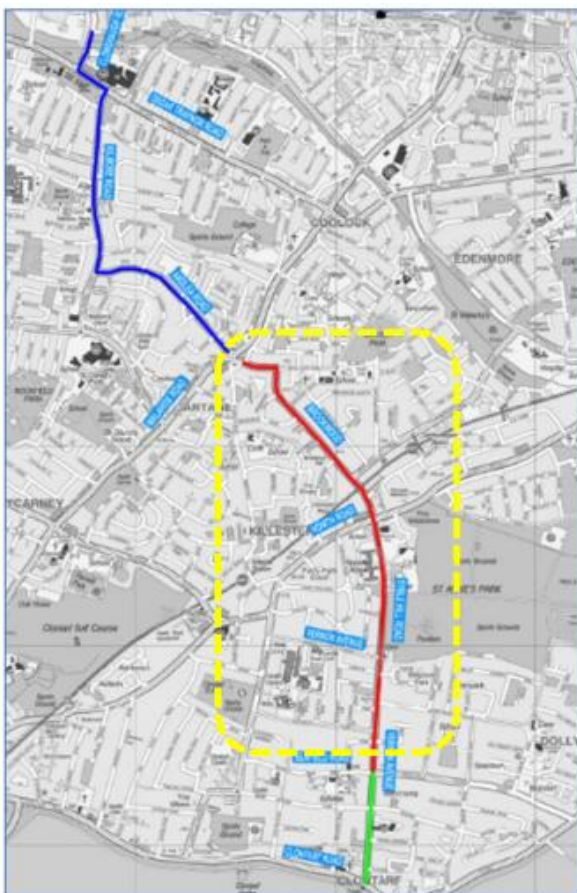


Figure 12: Coolock to Clontarf Route (phase 3 in blue) (Source: DCC)

Accessibility

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

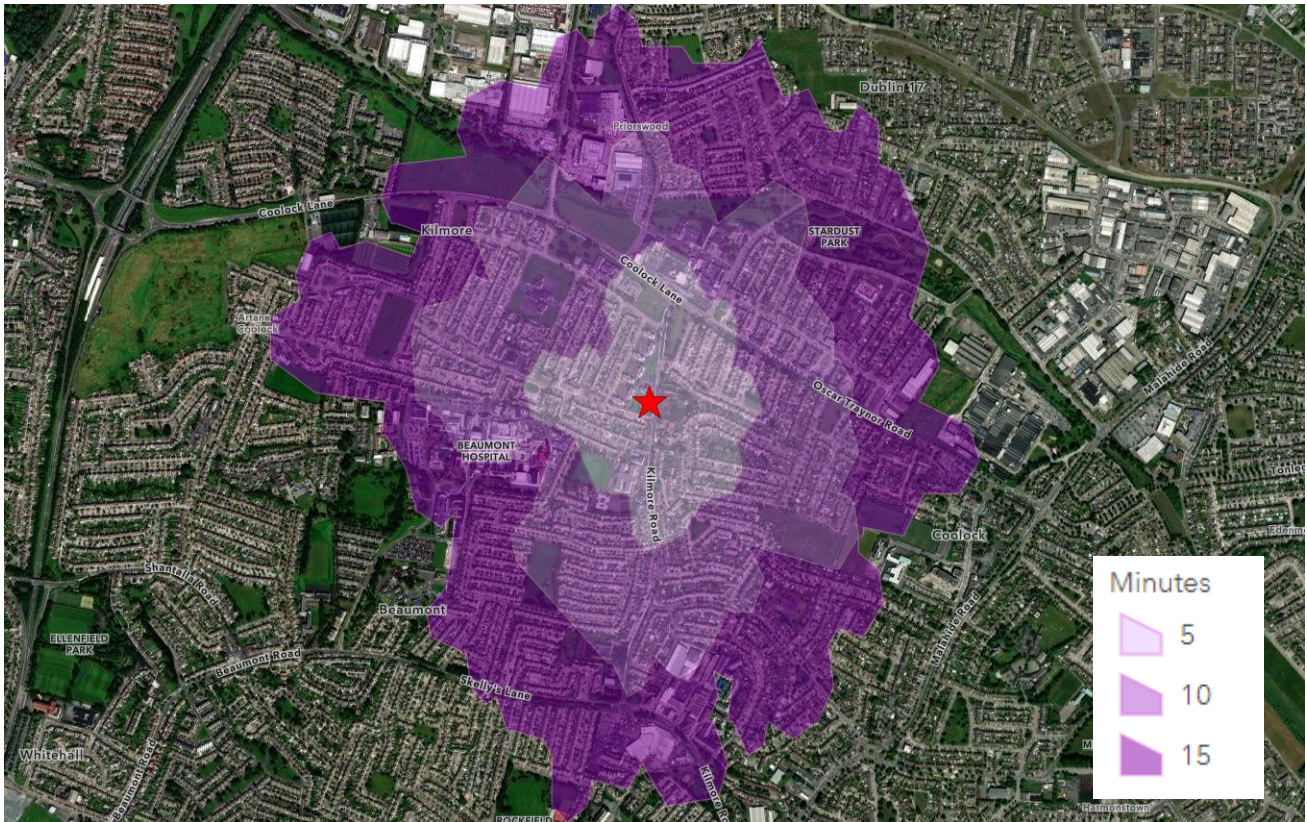


Figure 13: Walkability Patterns in 5,10 and 15-Minute Intervals (source: ArcGIS)

3. PROPOSED DEVELOPMENT

3.1 Project Description

The public notices describe the development as follows:

Planning and Development Act 2000 (as amended)

Planning and Development Regulations 2001 (as amended) - Part 8

Applicant: Dublin City Council – Housing Department.

Location: Cromcastle Court and Old Coal Yard, Kilmore, Dublin 5.

Proposal: Pursuant to the requirements of the above, notice is hereby given of the redevelopment of the existing Cromcastle Court and Old Coal Yard sites bounded by Cromcastle Park, Kilmore Road and Kilbarron Road, Dublin 5. The site is split by Kilmore Road. The existing 1.68 ha site currently comprises of 3 no. four storey apartment blocks providing 48 homes and a welfare depot on Cromcastle Court. The proposed works are in the vicinity of a Protected Structure, Woodville House RPS 4259.

The proposed development, which will be managed by Dublin City Council, comprises of:

- Demolition of existing buildings on Cromcastle Court site.
- Provision of 152 homes (90 no. 1 bed apartments, 47 no. 2 bed apartments, 15 no. 3 bed duplex apartments).
- Provision of a community facility.
- Construction of 6 no. apartment blocks on Cromcastle Court Site.
- Construction of 1 no. apartment block on the Old Coal Yard Site.
- Building heights ranging from four to six storeys.
- Construction of new ESB Substation.
- Provision of public and private open spaces.
- Provision of all associated site development works, hard and soft landscaping, boundary treatments, car and bicycle parking, ancillary structures and associated site infrastructure works, revision to access, footpaths, and all other necessary enabling works, site clearance works, roads and services.

The proposal has undergone Appropriate Assessment Screening in accordance with Article 6(3) of the Habitats Directive (92/43/EEC) and screening for Environmental Impact Assessment under the EIA Directive 2011/92/EU, as amended by Directive 2014/52/EU.

In accordance with Article 81 of the Planning & Development Regulations 2001, as amended, the Planning Authority has made a determination and concluded that:

- (a) The proposed development, either individually or in combination with other plans and projects, is not likely to have a significant effect on any European site(s) and therefore a Stage 2 Appropriate Assessment is not required.

- (b) There is no real likelihood of significant effects on the environment arising from the proposed development and that the proposed development is not of a class set out under Schedule 5 of the Planning and Development Regulations 2001, as amended, and therefore does not require an Environmental Impact Assessment Report (EIAR).

4. DESIGN RATIONALE

Dublin City Council considers the development of the site as a whole and elaborated a masterplan as can be viewed in the Architect Design Statement. This masterplan seeks to create a new central garden space at the heart of the site and create a strong edge to the surrounding streets while increasing permeability and connectivity with the existing green spaces and community centres.

The overall massing increases from Cromcastle Park toward the Kilmore Road, to provide a well-defined edge along the road and to protect the residential amenity of the residences located on Cromcastle Park.

The overall masterplan is founded on the following design principles:

- Active frontages
- Permeability
- Open space
- Connecting public spaces
- Community spaces
- Entrances
- Views
- Orientation
- Massing

The massing of the first phase of development varies from 4 to 6 storeys. The design aim is to create strong frontages and active streets to provide for a more human scale, particularly along the Kilmore Road, which is poorly overlooked at present. The proposed layout will provide for well-defined spaces and high quality public realm, significantly improving the outlook of the area. The block will provide a defined edge to the site, while also providing enclosure for the landscaped courtyard proposed for residents' use. The proposed community space will be located between block D and F, at a location that is accessible to all residents of the scheme. This location will also be the most accessible to the rest of the Cromcastle estate landbank when it will be developed.

Reference is made to the Architect Design Statement which explains the design rationale in more details.

5. RELEVANT PLANNING HISTORY

5.1 Site History

There is no planning history on the Part 8 site.

5.2 Surrounding Area

The following planning history in the surrounding area is of relevance to the subject proposal:

- **P.A Reg. Ref. 7003/23:** The Land Development Agency and Dublin City Council have notified of their intention to commence development under article 81A (1) of the Planning and Development Regulations as amended, at a site 0.75 ha bound by Oscar Traynor Road, Kilmore Road, Cromcastle Road and the HSE Primary Care Centre. The development comprises of the construction of 146 apartments in three blocks ranging from 1 to 8-storey in height. As of Q4 of 2024, development had commenced.
- **P.A Reg. Ref.LRD6019/22-S3 / ABP.Ref.316108-23:** Planning permission was granted for the development of 853 residential units at a site c.17.1 ha on land at Oscar Traynor Road. The development includes 343 social housing units, 340 cost rental units and 170 affordable housing units. It includes 3.64 ha of public open space, comprising of Lawrence Lands Parks which would include allotments, orchards, nature trail, skate and scooter park and of five smaller pocket parks. A neighbourhood hub of 1,680 sqm is provided and would accommodate a café, a shop, and 1,411 sqm of community/arts space. A creche with a capacity of 154 children is also planned.

6. PLANNING POLICY

6.1 National Policy

National Planning Framework – First Revision 2025

The National Planning Framework (NPF) – First Revision 2025 guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development. The National Strategic Outcomes are expressed as follows

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

The Revised NPF now plans for a population of 6.1 million by 2040. The increase in population target over the 2018 projection effectively requires nearly a doubling of households. On foot of the NPF, the Government has announce a new target of 303,000 units between 2025 and 2030 (50,000 per annum), scaling up to 60,000 units in 2030.

The revised NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Several national policy objectives (NPO) may be considered applicable to this development:

- NPO 8: Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.
- NPO 12 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- NPO 22 In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

For this NPO, the NPF specifically refers to the Sustainable Residential Development and Compact Settlement Guidelines. These guidelines are specifically addressed in further sections of this report.

The proposed development has been designed to prioritise walking and cycling. Public and communal open space has been designed to cater all users.

- NPO 42 To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.
- NPO 43 Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

The development of 152 units in Cromcastle will make a positive contribution to this objective. It is close to public transport and a number of public facilities.

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

The proposed development should be viewed as positively supporting this objective. It will allow for the increased density at a site in need of regeneration. The development is more compact and makes better use of land than the existing blocks at Cromcastle. The proposed development has a density of 233 uph with heights ranging from 4 to 6 storeys. The existing layout of the site is poor and does not make efficient use of lands in proximity to large employers, public transport and community infrastructure.

In summary, the proposed development is a suburban location with a wide range of amenities and retail options within easy reach. The proposed redevelopment of the Cromcastle Court Estate and Old Coal Yard is aligned with the policies and objectives of the NPF.

6.1.1 Climate Action Plans 2024 and 2025

The Climate Action Plan 2025 is the roadmap to deliver on Ireland’s climate ambition. It takes account of the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed in 2022. The plan reiterates the targets set out under the Climate Action and Low Carbon Development (Amendment) Act 2021 which seeks a reduction of 51% on GHG emissions by 2030 compared to 2018 levels and to achieve climate neutrality by 2050. The Plan should be read in conjunction with the Climate Action Plan 2024.

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

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

All units provided will be to the appropriate standards. Please refer to Climate Action Energy Statement accompanying this application.

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

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

- The provision of high residential density and in accordance with the NPF providing for compact growth.
- The proposed development provides a high-density residential development in close proximity to existing community facilities and amenities and close to public transport.
- The application site is within walking and cycling distance to BusConnects routes.
- Bicycle parking storage has been provided.

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

6.2 Ministerial Guidelines

A number of national planning guidelines may be considered.

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities (2007)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Urban Design Manual – A Best Practice Guide (2009)
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Street (2019)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018)
- Design Manual for Quality Housing (2022)

6.2.1 Guidelines for Planning Authorities on Childcare Facilities (2001)

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

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

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings.

A Social Infrastructure Audit (SIA) was prepared by MacCabe Durney Barnes and accompanies this part 8 application. The Dublin Childcare Committee was consulted which identified childcare providers within a 1 km radius.

The assessment excludes all one-bed units proposed, leaving 62 that may potentially give rise to a childcare need. This falls below the 75-units threshold. No creche is proposed as part of the proposed development.

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

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

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

A Design Statement accompanies the Part 8 documentation. The environmental and visual quality of the area as a whole will be enhanced significantly by the development of the site. The redevelopment of the site with residential use will achieve an efficient reuse of finite land located within the built fabric of Dublin City.

The proposed development has been designed to be cognisant of prevailing height and surrounding residential amenities. The lowest buildings are those located to the west and south at the interfaces with the existing residential units on Cromcastle Park and Kilbarron Road. The redevelopment of the site will be hugely beneficial in improving safety and security in the immediate area. The site is currently very open with poor natural surveillance. It has been vacated for some time and has been the subject of anti-social behaviour with graffiti and rubbish strewn close to the blocks. The Old Court Yard provides an unattractive frontage on the Kilmore Road. The development of the site will be hugely beneficial to the area, with the residential blocks overlooking all parts of the public open space and allowing for better surveillance of the public realm outside the site.

All units have been designed to meet the highest level of energy efficiency. The development will use energy efficient technologies to reduce its reliance on fuel and electricity demand.

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

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

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

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

The proposed development is located in Kilmore, Dublin 5, which would classify as an urban neighbourhood of Dublin. A range of 50 uph to 250 uph would therefore apply. The proposed density is 233 uph so the development is aligned with the guidelines.

Policy and Objective 3.1

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

The proposed density is 92 uph, which is within the ranged considered appropriate by the Guidelines for an urban neighbourhood.

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

The proposed density is 93 uph across the part 8 site (94 uph at Cromcastle Court and 91 at the Old Court Yard). The density is also aligned with the recommended density in the Dublin City Development Plan 2022-2028.

Policy and Objective 4.1

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

The principles approaches and standards of DMURS have been an integral part of the design process. This is detailed in the Infrastructure Report prepared by AECOM.

Section 4.4 outlines general aims of sustainable residential development, including the need to prioritise walking, cycling and public transport over the use of cars, and to provide residents with quality of life in terms of amenity, safety and convenience.

Policy and Objective 4.2

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

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

A Design Statement responding to the 4 criteria above has been prepared and accompanies the documentation. It provides a response to the criteria.

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

SPPR No.	Summary	Development Compliance
SPPR 1	Separation Distances When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.	The proposed development does not give rise to any separation distance between opposing windows of less than 16m.
SPPR 3	Minimum Private Open Space Standards for Houses Proposals for new houses meet the following minimum private open space standards: 1 bed house 20 sq.m; 2 bed house 30 sq.m; 3 bed house 40 sq.m; 4 bed + house 50 sq.m	Apartment units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

SPPR No.	Summary	Development Compliance
SPPR 3	<p>Car Parking</p> <p>In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling</p>	<p>A total of 57 no. car parking spaces have been proposed. Seven of which will be for car sharing. Owing to the site's location and proximity to existing and proposed high-quality transport, the proposed car parking provision is considered appropriate.</p>
SPPR 4	<p>Cycle Parking and Storage</p> <p>Safe and secure cycle storage facilities to meet the needs of residents and visitors. A general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided.</p>	<p>A total of 244 long stay bicycle parking spaces, and 76 short stay bicycle parking spaces are proposed.</p>

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

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

The proposed development includes 10.2% of public open space, which is aligned with the requirements of the Guidelines and of the CDP, and which should be viewed as appropriate in the context of the site.

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

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

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

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

The design has been designed in accordance with DMURS. It is not proposed to have through traffic within the site, with only resident traffic planned. The design aims to make the public realm in the area more enticing and secure, while promoting walking and cycling.

6.2.5 Planning Design Standards for Apartments Guidelines – Guidelines for Planning Authorities 2025

The Guidelines were published in July 2025 and supersede the 2023 Sustainable Urban Housing: Design Standards for New Apartments 2023. The Guidelines refer to the aforementioned Compact Settlement Guidelines with a view to identifying locations that would be suitable for apartment developments.

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

SPPR No.	Summary	Development Compliance
SPPR 1 – Housing Mix	<p>(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.</p> <p>(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.</p>	<p>The proposed development includes 34 age friendly homes which will be located on the Old Coal Yard site.</p> <p>A total of 118 'regular' units will be provided otherwise. These include 56 no. 1-bed (47.5%); 47 no. 2-bed (39.8%) and 15 no. 3-bed (12.7%).</p> <p>The Guidelines specifically exempt sheltered units from the mix requirement under section 2.21. The development complies.</p>
SPPR 2 – Minimum Floor Areas	<p>Minimum Apartment Floor Areas</p> <ul style="list-style-type: none"> • Studio apartment (1 pers) - 32 sq.m • 1-bedroom apartment (2 pers) - 45 sq.m • 2-bedroom apartment (3 pers) - 63 sq.m • 2-bedroom (4 pers) - 73 sqm • 3-bedroom (4 pers) - 76 sqm 	<p>Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) and which demonstrates compliance.</p> <p>All units meet the floor area requirement.</p> <p>HQA sets out in table format the floor area of each apartment and the compliance with the Guidelines.</p>

SPPR No.	Summary	Development Compliance
	<ul style="list-style-type: none"> 3-bedroom apartment (5 pers) – 90 sqm 	
SPPR 3 – Dual Aspect	<p>In relation to minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply</p> <p>(i) A minimum of 25% of dual aspect units shall be required to be dual aspect. Statutory plans shall not specific minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.</p>	All units are dual aspect.
SPPR 4 – Floor to Ceiling Height	<p>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</p>	The proposed floor to ceiling height of ground floor units is 2.7m in accordance with this specific policy.
SPPR 5 – Units per floor per core	<p>There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number per floor per core.</p>	Noted.
SPPR 6 – Communal, Community and Cultural Facilities	<p>The provision of new communal, community and cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.</p>	Please refer to the relevant section of this report discussing CUO25.

Non-specific policy in the Guidelines (2025)

Section 3.3 of the guidelines provides that '*at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes in more suburban locations, social housing developments, social and affordable housing delivered by Part V and schemes to provide housing for older persons and/or persons with disabilities*'.

The guidelines further states: '*Where between 10 to 49 residential units are proposed, the above shall generally apply but in order to allow for flexibility, it may be assessed on a on a case-by-case basis and if considered appropriate, reduced in part or a whole, subject to consideration, by the Planning Authority or An Coimisiún Pleanála of the overall design quality.*'

Please refer to the Housing Quality Assessment by Metropolitan Workshop.

Play areas

The Guidelines indicate the following should be provided:

- Small play spaces (about 85 –100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms.
- Play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.

The proposed development includes 118 mainstream units, including 62 which are two-bed or more. It therefore gives rise to the need to provide 85-100 sqm for a small play area. Two play areas are provided as part of the site development. One is to be located immediately adjacent to the east of Bloc D and a bigger one to located in the central courtyard of Blocks A,B, E and F.

Open Space Provision

The Appendix sets out the minimum recommended floors areas for communal amenity space, where provided as follows:

Table 1: Communal Amenity Space Provision

Open Space	Area Requirement	No. of units in the Development	Total requirement
One Bedroom	5 sqm	90	450
Two bedroom (3 persons)	6 sqm	15	90
Two bedroom (4 persons)	7 sqm	32	224
Three bedroom (4 persons)	7 sqm	-	-
Three bedroom (5 persons)	9 sqm	15	135
Total		152	899

The proposed development includes 3,376.1 sqm of communal amenity space, which largely exceeds the requirement.

Cycle Provision

Design Standards for New Apartments – Guidelines for Planning Authorities provide the following: Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at

the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. Given the proposed housing mix (particularly high UD and UD+ units), the provision of 244 long stay bicycle parking, and 76 short stay bicycle parking spaces is proposed to serve the development. These are sheltered and located in dedicated secure stores It therefore complies with the requirement.

Deviation from the standard is at the discretion of the Planning Authority.

6.2.6 Appendix Standards

The appendix 1 sets out minimum standards for apartment to be complied with in relation to storage and private open space. The following qualitative standards are set out in the accompanying Housing Quality Assessment:

- Required Minimum Floor Areas and Standard
- Minimum aggregate floor areas for living/dining/kitchen rooms, and minimum widths for the main living/dining rooms
- Minimum bedroom floor areas/widths
- Minimum aggregate bedroom floor areas
- Minimum storage space requirements
- Minimum floor areas for private amenity space
- Minimum floor areas for communal amenity space (discussed in the following section)

The HQA shows that the apartment units comply.

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

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

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

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

The Dublin City Development Plan 2022-2028 applies to the subject site. Given the proposed heights ranging from 4 to 6-storey, which are considered appropriate having considered the surrounding area and within the permissible envelopes of the Dublin City Development Plan. Further assessment is not considered necessary.

6.3 Regional Policy

Regional and Spatial Economic Strategy for the Eastern and Midlands Region

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

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

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

The development complies with the principles of the RSES. It will support the consolidation of the urban fabric and is located on an infill site. It also a number of community facilities and is within minutes walk of shops and public transport.

6.4 Local Policy

Dublin City Development Plan 2022-2028

Strategic Objectives

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

The Core Strategy and Settlement Hierarchy of the Dublin City Development Plan outlined in Table 2-8 of the Development Plan presents the spatial structure and proposed residential yield in the various areas of the City. The development is located in the urban consolidation area 'City Centre within the M50' where is the proposed residential yield is 12,900 units for a planned population of 23,220.

Under CSO7 *'Promote Delivery of Residential Development and Compact Growth'*, the Council seeks *'To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas.'* The proposed development is fully aligned with CSO7 as the site is an underutilised infill site with a city centre zoning. The site will allow consolidating the urban fabric

in the area. Under CSO 10, it supports the development of brownfield, vacant and regeneration sites, such as the subject site.

Zoning

The Dublin City Development Plan (CDP) 2022-2028 zones the lands Z1 'Sustainable Residential Neighbourhoods' which objective is 'to protect, provide and improve residential amenities'. The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city.

Permissible uses include inter alia community facilities, as well as residential, cultural and recreational buildings and uses.

The proposed development includes residential and community uses and therefore complies with the zoning objective.

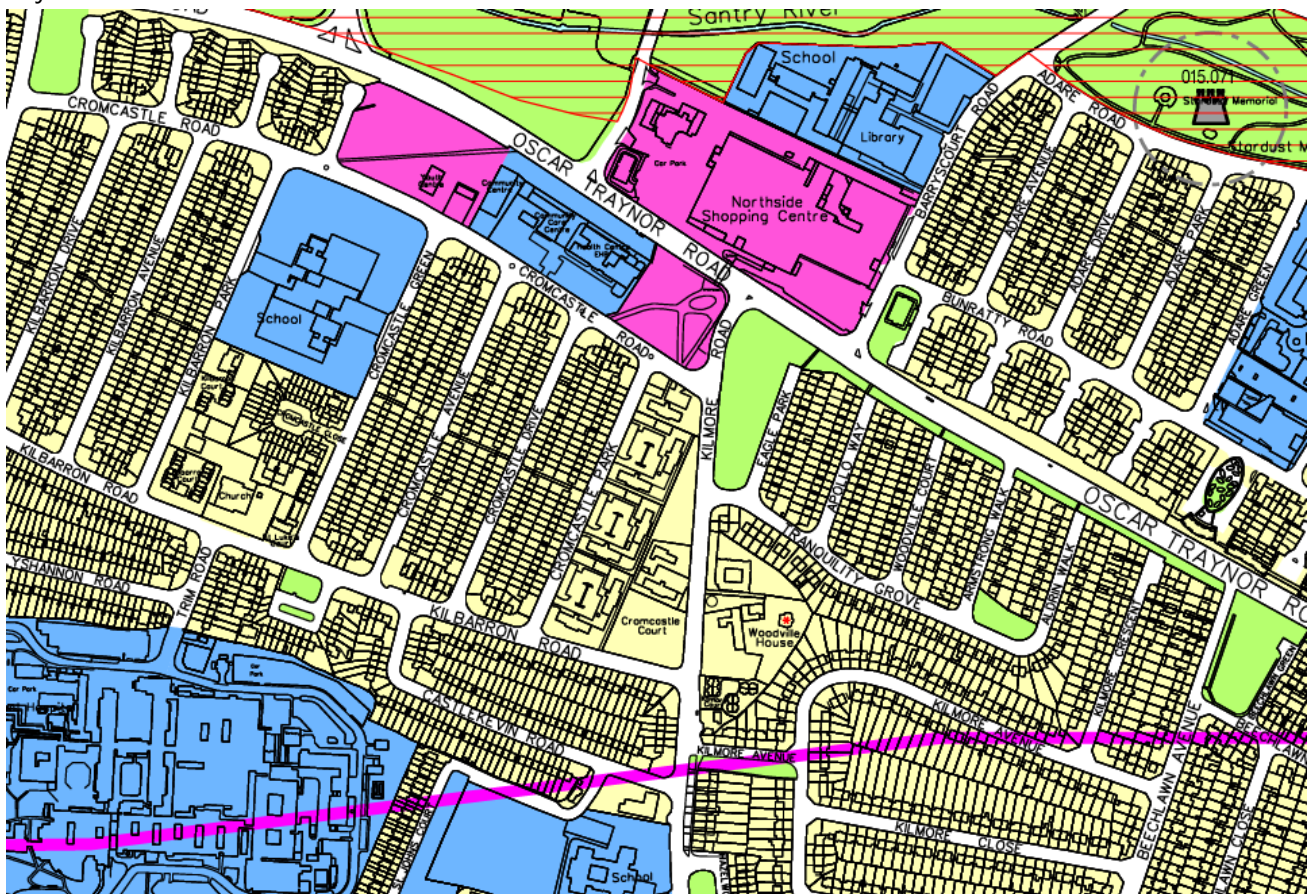


Figure 14: Extract from the zoning map (Source: Dublin City CDP 2022-2028)

Under QHSN3, the Council seeks to implement its Housing Strategy and Housing Need and Demand Assessment (HNDA) and to encourage the provision of a variety of housing typologies and tenures. The proposed development includes development includes 152 apartment units in 7 no. apartment blocks (Block A1, Block B1, Block C1, Block D1, Block E1, Block F1 and Block G1) comprising 90 no. one-bed (59.2%), of which 34 are for older persons, 15 no. two-bed / 3 persons, 32 no. two-bed / 4 persons (or 37 no. two-bed (31%)) and 15 no. three-bed units (9.8%).

While all units are apartment type units, 15 no. duplex units. The development includes 34 age friendly homes.

The proposed development is located on a site in need of regeneration and will be transformative for the area. It will also allow for urban consolidation on an infill / brownfield site in accordance with QHSN6.

The site is located in a suburban area of Dublin and will allow for considerably higher density than the current one at the site. This is aligned with QHSN04 Densification which supports the ongoing densification of the suburbs. The part 8 application also supports the achievement of QHSN9 on active land management. The proposal aligns with QHSN10 ('Urban Density') as the part 8 site is an infill site and is underutilised. The development also provides the opportunities to cater for homes to support the creation of communities and to sustain constant all year-round activity in the area. The proposed development will be of high standards of urban design and architecture.

Under this chapter and specifically QHSN11, the Council promotes the realisation of the 15-minute city which *'provides liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible'*. Meanwhile, QHSN12 promotes neighbourhood development. The site is located close to a wide range of amenities, a shopping centre, a hospital and bus services. The design incorporates energy efficiency measures and renewable energy.

The proposed development will provide high quality housing for a range of households in a highly accessible location, with a wide range of amenities within a short distance.

The proposed development has been designed and is in accordance with QHSN011 'Universal Design'.

The proposed development includes a community, cultural and arts space (132sqm) with associated external spill out space (124sqm) is proposed at ground floor of Block E1. Provision of such space is aligned with policies QHSN47 High Quality Neighbourhood and Community Facilities and QHSN50 Inclusive Social and Community Infrastructure. A Social Infrastructure Audit accompanies this part 8 submission in accordance with QHSN48 Community and Social Audit. The Social Infrastructure Audit report prepared to accompany this part 8 application shows the wide range of facilities available within 15 minutes of the site. The site is ideally located to achieve a 15-minute city lifestyle for its residents.

This part 8 application is the first phase of the redevelopment of the Cromcastle Court estate. The blocks proposed for demolition have been decanted.

Under chapter 8 of the CDP, Policy SMT1 'Modal Shift and Compact Growth' and objective SMT01 'Transition to More Sustainable Travel Modes', the Council promote a shift from the use of private car towards an increased use of more sustainable forms of transport and more active mobility. The proposed development includes for 72 no. car parking spaces. It makes generous allocations for cycle parking, including cargo bikes and it is located near a range of bus routes. The proposed development supports both the policy and the objective.

In accordance with policy SMT4 'Integration of Public Transport Services and Development', the proposed development has a density of 93 uph, provides for connectivity between uses, and includes facilities which can be used by the broader community.

High quality public realm proposals are catered for as part of the development in accordance with SMT9. The development will particularly help improve significantly the outlook on Kilmore Road, Kilbarron Road and Cromcastle Park with a new strong and active building frontage. In addition, all areas of public and communal open space are well overlooked by residential units and balconies.

Under SMT010 'Walking and Cycling Audits', the Transport Assessment prepared by ARUP accompanies this part 8 application.

SMT27 'Car Parking in Residential and Mixed-Use Developments' promotes sustainable car parking with a view to promote city living and reduced car parking standards. The proposed development includes a 52 no. spaces.

It is considered that the subject development site is located within an "Intermediate Location" as designated within the DHLGH Apartment standards, with a range of buses within a short walk, but none of which with a frequency of 10min. There are a number of buses with 12-15 min frequency, either along the Kilmore Road or in the Beaumont Hospital Campus. In intermediate locations, car parking should be reduced. The proposed development includes 57 spaces or a ratio of 0.37. Given the proximity to a wide range of amenities and employment areas, and the range of buses accessible within a short walk from the site, the provision was deemed adequate. The rationale for the car provision accompanies this part 8 application.

Green Infrastructure and Recreation

A number of policy objectives relate to green infrastructure. In particular, it requires under GI4 'Accessibility', that all green infrastructure elements should be universally accessible and that new developments should include green infrastructure and an ecosystem services approach (GI6 'New Development / New Growth Areas'). All areas of open space will be universally accessible, and the development will incorporate blue and green roofs, as well high-quality landscape features which together will support mitigation and adaptation to climate change.

GI01 ('Green Roof Guidance Document') should also be noted. The development response is provided under in the Civil Infrastructure Report by AECOM. GI28 'New Residential Development' requires that, in new developments, public open space is provided which is sufficient in amenity, quantity and distribution. The proposed development includes high quality public realm space, public open space and communal open space, therefore is considered to meet the requirement. The main public open space provision will be located immediately to the north of Block F. At a further stage, the public open space provision will be consolidated along a central spine as shown in the Architect Design Statement, which will be delivered when future phases of development are brought forward.

The CDP also includes policies on tree planting and retention. In particular, it requires appropriate and long-term tree planting in the planning of new developments (GI40) and the protection of existing trees (GI41). There is a tree of good quality, namely a Himalayan Cedar, along the Kilmore Road boundary, which is proposed to be retained.



Figure 15: Himalayan Cedar Proposed to be retained (Source; Google maps)

The site cover comprises of amenity grassland and apartment blocks. The site has generally a low ecological value due to the lack of features present on the site, save for the aforementioned tree of the CDP. As a result of the development, its ecological quality will improve owing to high quality planting and landscaping, and the site will make positive contribution the City's green infrastructure network.

The development includes children's play facilities in the communal open space as required under GI51 and GI52.

The Ecological Impact Assessment considers the development response in relation to Policy GI 16 of the CDP. It notes that subject to the implementation of the measures shown on the landscape plans, the landscaping proposals for the scheme will increase the diversity of habitats within the site. The proposed measures includes new trees and shrubs planting, the creation of meadow, the use of bio-retention areas and rain gardens and the use of bird boxes.

Culture

Under chapter 12 – Culture, the CDP requires that large-scale development above 10,000 sqm in total area should provide for a minimum of 5% community, arts and culture space (CU025). Under the objective, the CDP notes that *'the option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome'*.

The proposed development exceeds the 10,000m² GIA and therefore the requirements for community and cultural space under CU025 applies.

The NIA for residential area is 9,416 m² the required community space for this development is 5% is 470.80sqm.

The CDP provides the option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. This results in a minimum requirement of 235.5sqm community space.

The proposal includes a total of 256 sqm of community space which exceeds the minimum by 20.5sqm, 132 sqm of which will be internal, with 124 sqm located immediately adjacent outdoors. The provision of indoor / outdoor space will allow for a greater variety of events or activities to take place, such as community theatre and fairs as well as more traditional community use. The space has been designed as a flexible space and will be universally accessible. Its provision at the centre of the scheme, will make positive contributions to community building. At present, the community space would represent, 2.8 % of the overall NIA, of which 1.4% would be internal.

Future phases of development will further contribute to the requirement.

Development Management Standards

The development management standards are contained in the Chapter 16 of the Dublin City Development Plan 2022-2028.

Table 15-1 of the CDP shows the suite of documents required to accompany applications for development.

Reports	Threshold	Application Reference
Architectural Design Report	50 or more residential units	Architect Design Statement
Housing Quality Assessment	All residential development	HQA
Landscape Design Report	30 or more residential units	Landscape Report
Planning Report	30 or more residential units	This report
Daylight and Sunlight Assessment	All apartment developments	Daylight and Sunlight Assessment Report
Community and Social Audit	50 or more residential units Any development comprising of community or social infrastructure	Social Infrastructure Audit
Lifecycle Report	All apartment developments	Building Lifecycle Report

Reports	Threshold	Application Reference
Community Safety Strategy	100 residential units	See Architect Design Statement Appendix 3 Community Safety Strategy
Operational Management Statement	30 or more residential units	See Operational Waste Management Plan and Building Lifecycle Report
Traffic and Transport Assessment	50 or more residential units	Transport Assessment
Mobility Management Plan / Travel Plan	20 or more residential units Any development with zero/reduced car parking.	Transport Assessment
Site Specific Flood Risk Assessment	Any developments within a flood zone a and b	Stage 1 - Flood Risk Assessment
Site Investigation Report	All developments on site that comprise of contaminated lands and/or where basement is proposed.	n/a
Conservation report		n/a
Retail Impact Assessment		n/a
Ecological Impact Assessment	All developments that are located within or adjacent to any sensitive habitat, on sites that could contain protected species or in a quality landscape environment.	Ecological Impact Assessment.
Appropriate Assessment Screening and NIS	An Appropriate Assessment Screening is required for all developments. A stage 2 (Natura Impact Statement) is required where significant effects on the environment are likely either alone or in combination with any other project.	Appropriate Assessment Screening Report. NIS not required.
Environmental Impact Assessment	All developments within the threshold set out in Planning and Development Act 2000, as amended or any development that has a significant impact on the environment.	EIA Screening Report.
Landscape and Visual Impact Assessment, Microclimate Assessment, Telecommunications Report – see Appendix 3	Site specific circumstances	n/a

Green Infrastructure and Landscaping

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

Standard	Development Response
<p>Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.</p>	<p>The proposed development has sought to retain the Himalayan cedar and another tree located along the Kilmore Road boundary of the site. They will be incorporated and enhanced by additional planting.</p> <p>Having regard to the site currently consisting almost entirely of buildings and amenity grassland which are of low ecological value. Following the implementation of biodiversity enhancements through the landscaping proposals and SUDs measures at the scheme, a net gain in the biodiversity value at the site is expected, according to the EclA.</p>
<p>The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city's green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and 'stepping stones' to ensure biodiversity protection.</p> <p>(see also GI7 'Connecting Greening Elements in Site Design')</p>	<p>The site will provide for a total of 10.2% of open space.</p>
<p>Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.</p>	<p>The ecological quality of the site is limited and has limited ecological attributes. The main ecological attributes are the Himalayan Cedar located along the Kilmore Road, which is retained.</p>

Surface Water Management and SuDS

Standard	Development Response
<p>All new developments will be required to prepare a Surface Water Management Plan in accordance with</p>	<p>Please refer to the following engineering drawings</p>

Planning Statement

Standard	Development Response
the requirements of the Council's Surface Water Management Guidance.	<ul style="list-style-type: none"> - 0510 – Cromcastle Court Phase 1 – Proposed SUDS Layout - 0511 – Old Coal Yard Phase 1 - Proposed SUDS Layout
SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer	Please refer to the Engineering Report prepared by AECOM which provides a comprehensive overview of the SUDS measures proposed at the site.

Green/Blue Roof

Consideration	Development Response
All new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23	Details of the proposed green / blue roof build-up are provided in the 0510 and 0511 drawings and are discussed in the Infrastructure Report by AECOM.

Urban Greening

Consideration	Development Response
All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc.	Please refer to Landscape Report prepared by Metropolitan Workshop and AECOM.

Landscape Plans and Design Reports

Consideration	Development Response
Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	A Landscape Design Report prepared by Metropolitan Workshop and AECOM accompanies this application.
Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans	Please refer to Landscape Plans prepared by AECOM.
A tree survey must be submitted where there are trees within a proposed planning application site.	Please refer to the Tree Survey Plan and associated report by J M McConville and Associates.

Public Open Space and Recreation

Standard	Development Response
The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.	The proposed development will make substantial contribution to the surrounding built environment. Currently areas of open space in the site are concentrated to the south-east corner and to the edges of each sub plot, with the buildings well removed from the street frontage. The entire

Standard	Development Response
	<p>landbank is also fenced off on all sides, which makes the usability and accessibility of these open spaces sub-optimal. The layout allows for a clear definition between communal and public open space, with public open space accessible to the surrounding area. In addition, the redevelopment of the site will allow for a much more engaging frontage particularly along the Kilmore Road and the Kilbarron Road.</p> <p>The redevelopment of the Old Coal Yard will improve the amenity of the surrounding housing units, especially those located at Kilmore Court and Tranquility Grove, which are neighbours of the site. In addition, this site is fenced off by hoarding, which does not cater for a aesthetically pleasing outlook on the Kilmore Road.</p>
<p>Open space should be overlooked and designed to ensure passive surveillance is achieved</p>	<p>Please refer to the Landscape Design Report prepared by Metropolitan Workshop and AECOM accompanies this application.</p>
<p>The space should be visible from and accessible to the maximum number of users.</p>	<p>All areas of communal open space are visible to the residents of the scheme. The area of public open space will be visible to the residents of Block F, to those living on the most southern inhabited block of Cromcastle Court and to anyone travelling along the Kilmore Road. It will accessible to all.</p>
<p>Inaccessible or narrow unusable spaces will not be accepted.</p>	<p>No inaccessible or unusable spaces are proposed.</p>
<p>The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16</p>	<p>Please refer to the Daylight and Sunlight assessment by Chris Shackleton Consulting.</p>
<p>Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks.</p>	<p>The proposed communal open space will be located in the two courtyards. The landscaping strategy includes various biodiversity enhancement measures at the site which will improve the ecological value at the site.</p>
<p>Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.</p>	<p>Several existing trees will be retained and will be incorporated into the design. Replanting of trees will occur at a 3:1 ratio of current quantity. As part of the development, extensive landscaping including planting is proposed.</p>
<p>Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.</p>	<p>Several existing trees will be retained and will be incorporated into the design. Replanting of trees will occur at a 3:1 ratio of current quantity. As part of the development, extensive landscaping including planting is proposed.</p>
<p>Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated</p>	<p>A coordinated approach within the landscape design has been taken for water management, with the</p>

Planning Statement

Standard	Development Response
biodiversity areas or wetlands which can reduce / better manage surface water run-off.	provision of permeable surfaces and build-ups throughout the scheme
Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12).	Please refer to Landscape Plan prepared by AECOM.
Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	Refer to the Metropolitan Workshop Architect's Design Statement.
Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.	Please refer to Landscape Report and Plans prepared by AECOM.
Age friendly measures should be incorporated into the design.	Please refer to landscape layout plan and Landscape Report prepared by AECOM.
Permeability and accessibility for all users, particularly disabled persons should be provided	Please refer to the Architect's Design Statement.
Cycle and pedestrian friendly routes should be accommodated.	Pedestrian and cycle movements are prioritised over car movements throughout the site.

Play Infrastructure

Standard	Development Response
In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.	As stated earlier, the development includes for play areas. These are located in the communal open space proposed.

Apartment Standards

Standard	Development Response
<p>Unit Mix</p> <p>Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless</p>	<p>This part 8 proposal was formulated jointly with the DCC Housing Department. Older persons housing is excluding from the calculations in accordance with SPPR 1. The development complies.</p>

Standard	Development Response
<p>specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> <p>Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department.</p>	
<p>Unit Size / Layout Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments</p>	<p>Please refer to the Architect's HQA. All apartments achieve minimum floor areas.</p>
<p>Dual Aspect Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate</p>	<p>All Apartments are dual aspect.</p>
<p>Floor to Ceiling Height A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided</p>	<p>Please refer to the HQA. All apartments achieve minimum standards.</p>
<p>Lift, Stair Cores and Entrance Lobbies a maximum of 12 apartment per core may be provided</p>	<p>Please refer to the HQA. All apartments achieve minimum standards.</p>
<p>Internal Storage Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments</p>	<p>Please refer to the HQA. All apartments achieve minimum standards.</p>
<p>Private Amenity Space Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2023) for details.</p> <p>At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.</p>	<p>Please refer to HQA. All apartments achieve minimum standards in respect of private amenity space.</p> <p>All units are ground floor are own door and are sufficiently removed from the public footpath.</p>

Standard	Development Response
<p>Communal Amenity Space All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development. The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p>	<p>Please refer to the section of this report on the apartment guidelines.</p>
<p>Internal Communal Facilities Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.</p>	<p>The proposed development includes 132 sqm of community space which can be used by residents.</p>
<p>Security New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas.</p>	<p>Please refer to the Architect's Design Statement. A community safety strategy is submitted with this Part 8 application.</p>
<p>Access and Services Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.</p>	<p>All pedestrian and vehicular access points are clearly defined and overlooked.</p>
<p>Refuse Storage Refuse storage and collection facilities should be provided in all apartment schemes. All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan.</p>	<p>Refuse storage is provided, please refer to Metropolitan Workshop Ground Floor plan drawings. An Operational Waste Management Plan accompanies this part 8 application.</p>
<p>Lifecycle Reports All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p>	<p>A Building Lifecycle Report accompanies this application.</p>
<p>Operational Management and Maintenance All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with</p>	<p>A Building Lifecycle Report accompanies this application. An Operational Waste Management Plan also accompanies this application.</p>

Standard	Development Response
the maintenance strategy for the upkeep of the building.	
<p>Microclimate – daylight and sunlight, wind and noise</p> <p>All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind</p>	<p>Previous sections of this report discuss these reports where appropriate, specifically the apartment guidelines section in relation to sunlight and daylight and the building height guidelines in relation to microclimate.</p> <p>In terms of noise, a comprehensive assessment has been prepared by Wave Dynamics as part of the application. All apartment developments have been designed as to ensure noise transmission between units and from external or internal communal areas is minimised.</p>
<p>Daylight and Sunlight</p> <p>A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>	<p>A comprehensive daylight and sunlight assessment accompanies this part 8 application prepared by Chris Shackleton Consulting.</p>
<p>Separation Distance</p> <p>Traditionally a minimum distance of 22m is required between opposing first floor windows.</p>	<p>The proposed separation distance complies.</p>

Standards as Derived from the Appendices

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

Standard	Development Response
<p>Density Ranges</p>	<p>The proposed development has a density of 93uph and therefore is within the range of the CDP.</p>
<p>Bicycle Parking Standards</p> <p>Table 1 of appendix 5 sets out parking standards:</p> <p>Residential apartment: 1 space per bedroom (long term) and 1 per 2 apartments (short term).</p> <p>Creche: Long Term – 1 per 5 staff and 1 per 10 children</p>	<p>244 long stay bicycle parking spaces, and 76 short stay bicycle parking spaces.</p>
<p>Car Parking Standards</p> <p>The site falls under Zone 3 1 no. space per dwelling 1 no. space per 2 dwelling for Elderly Persons housing</p>	<p>The proposed development includes 57 no. spaces. Three car sharing spaces are also provided.</p>
<p>Electric Vehicles</p>	<p>An element of EV parking will be provided onsite.</p>

Standard	Development Response
<p>All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.</p>	
<p>Motorcycle Parking New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided</p>	<p>Having regard to the parking strategy at the site, and the priority of pedestrian and cyclist movement as a result of the proposed development, no motorcycle parking has been proposed as part of the development.</p>
<p>Waste Storage Facilities</p> <ul style="list-style-type: none"> • Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of nonreusable receptacles such as bags, ideally of 1,100 litre capacity, must be used. • To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general (residual) waste, dry mixed recyclables and organic waste. A proposal on the three-bin system including bin quantity, type and frequency of collection must be submitted in writing to the Waste Regulation Unit in Dublin City Council for agreement. Sufficient space must be provided to accommodate the collection of dry mixed recyclables and organic waste. • Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes. 	<p>The proposed Waste Storage Area for Apartment Blocks are located on ground level.</p> <p>The proposed waste storage facilities accord with these requirement, please refer to the Operational Waste Management Plan prepared by ORS which accompanies this application</p>
<p>Green and Blue Roof Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application. The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.</p>	<p>Refer to the Civil Engineering report which demonstrates compliance.</p>

Standard	Development Response
<p>Minimum coverage for an extensive green roof is 70% Minimum coverage for an intensive green roof is 50%.</p>	
<p>SuDS Requirements SuDS requirement 1 – runoff destination SuDS requirement 2 – hydraulic control SuDS Requirement 3 – Water Quality SuDS Requirement 4 – Amenity SuDS Requirement 5 - Biodiversity</p>	<p>Refer to the Civil Engineering report which discusses the provision of SUDS on the site.</p>
<p>Surface Water Management Planning Development including or in excess of 2 no. residential units or 100 sq. m. of non-residential uses (including social and community uses) All developments with surface water implications which fall within these thresholds will be required to prepare a SWMP as part of their project design process.</p>	<p>Refer to the Civil Engineering report which demonstrates compliance.</p>

7. ENVIRONMENTAL ASSESSMENTS

7.1 Environmental Impact Assessment

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

"Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- *The scale, nature and location of the proposed impacts*
- *The potential impacts and proposed mitigation measures*
- *The results of the any other relevant assessments of the effects on the environment*

It is considered that the proposed development would not be likely to have significant effects on the environment and it is concluded that an environmental impact assessment report is not required."

7.2 Appropriate Assessment

An AA Screening Report has been prepared by Openfield Ecology and accompanies this application. The report concludes:

'No significant effects will arise from this project to any Natura 2000 site. In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

On the basis of the screening exercise carried out above, it can be concluded that significant impacts on any Natura 2000 site, whether arising from the project itself or in combination with other plans and projects, are not likely to arise. This conclusion is based upon the best scientific knowledge available'.

7.3 Ecological Impact Assessment

An Ecological Impact Assessment accompanies this Part 8 application prepared by NM Ecology. The report concludes:

'Subject to these measures, it can be concluded that the proposed development will not cause any significant negative impacts on designated sites, habitats, legally protected species, or any other features of ecological importance'.

7.4 Flood Risk Assessment

A desktop Flood Risk Assessment has been prepared by AECOM. The report concludes:

The site is considered to be sufficiently far enough away from the Santry River and from the predictive coastal flooding for the risk from these sources to be considered as low. This classifies the site as being flood Zone C, which is at the lowest risk of flooding.

Nevertheless, it is noted that the water level for the Fluvial node 09SANT00507 in Table 3.1 is 40.87m OD. Therefore, it would be prudent to set all FFL's within the site to minimum of 41.37m OD, to allow a 500mm freeboard above the 0.1% AEP (1 in 1000-year return period) storm event. Subsequently, AECOM note that the proposed FFLs for Phase 1 have been set as follows:

- Block A1 – 41.37m OD,
- Block B1 – 41.65m OD,
- Block B2 – 41.65m OD,
- Block C1 – 42.20m OD,
- Block D1 – 42.70m OD,
- Block E1 – 41.80m OD,
- Block G1 – 41.70m OD.

The pluvial predictive mapping indicated that there is a risk of localised pluvial flooding within the site, and hence, it is expected that this risk can be mitigated through an effective surface water and SuDS strategy, which should be supplemented with a drainage maintenance inspection checklist, with this checklist being regularly updated by the management agency.

The proposed development has been classified as being located within Flood Zone C. In accordance with The Planning System and Flood Risk management Guidelines 2009 (Guidelines), no Justification Test for the development is required.

7.5 Archaeological Impact Assessment

An Archaeological Testing and Monitoring Report has been prepared by Edmond O'Donovan and Associates. It notes:

'It is not likely that the construction work will uncover archaeological remains, but given the findings of this report and in the event that archaeology survives on site the following is recommended:

- *The developer shall engage an Archaeologist / Building Historian to examine the fabric of upstanding walls, sheds, outbuildings and the remains of Woodville House for traces of the earlier Straw Hall and to prepare a report on the evolution of the buildings if such can be achieved through field inspection, survey and photographic record in advance of any development of permitted demolitions within and around Woodville House and within and under the 'Old Coal Yard' site.*
- *The developer shall engage the services of a suitably qualified archaeologist to monitor the excavation of foundations and / or all site investigations and ground disturbance associated with the development (licensed under the National Monuments Acts 1930-2014 and subject to the passage and enactment of the Historic and Archaeological Heritage and Miscellaneous Provisions Bill 2023).*
- *Where archaeological material is found to be present during the course of the monitoring the archaeologist may have the works on site stopped pending a decision of the on the best approach to deal with the archaeology. The developer shall be prepared to be advised by the National Monuments Service within the Department of Housing, Local Government and Heritage with*

regard to the necessary mitigation action required. The developer shall facilitate the archaeologist in recording any such material prior to construction works being completed. It is envisaged that a record of any such walls and structures would be required prior to their removal.

The developer should be cognisant of the relevant portions of the National Monuments Acts (1930–2014; Appendix 1, note this is subject to the passage and enactment of the Historic and Archaeological Heritage and Miscellaneous Provisions Bill 2023), which outline their statutory responsibilities in respect of reporting archaeological items discovered during construction works to the National Museum of Ireland (Irish Antiquities Division), and the National Monuments Service of the Department of Housing, Local Government and Heritage. This legislation also outlines the developer’s obligation to facilitate and fund all archaeological works that are considered necessary by National Monuments or the National Museum in respect of development proposals.

All recommendations contained herein are subject to the approval of the planning process (Part VIII) in consultation with the National Monuments Service of the Department of Housing, Local Government and Heritage.’

8. CONCLUSIONS

In summary, the proposed development is for social housing on zoned lands under the control of Dublin City Council. The proposed development consists of apartments with landscaped areas and community space.

The proposed development will make a positive contribution to the densification and consolidation of the urban fabric in Dublin 5, particularly as it reuses the sites of the Cromcastle Court Flats and of the Old Coal Yard. It will generally improve the outlook of the area, with the reuse of a underused site. The housing mix will help alleviate demand for social housing in the area. It has been a long term objective of the Council to redevelop the site. Redevelopment will be hugely beneficial to the area, providing an uplifting of the outlook of the area.

The proposed development will contribute to a diversification of housing tenure in the Cromcastle and make a positive contribution to the area owing to the provision of high quality landscaping.

It has been demonstrated within this report, as well as within the accompanying drawings, documents that the proposal provides a suitable form of development for this site.



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