

Part 8 Planning Report

Residential Development

On lands known as the ‘Spine Site’ at Darndale, Dublin 17. The site is generally bound by Primrose Grove & Snowdrop Walk to the North, Buttercup Avenue to the East, Buttercup Avenue, Marigold Avenue & Marigold Park to the South and Our Lady Immaculate Church to the West.

On behalf of

Dublin City Council

In Partnership with Respond Housing Association

July 2026



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1 Introduction

We, Brock McClure Planning and Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of Dublin City Council in partnership with Respond Housing Association, to accompany a Part 8 Proposal for the provision of 84 no. residential units (34 no. houses and 50 no. apartments) on lands known as the ‘spine site’ at Darndale, Dublin 17. The site is generally bound by Primrose Grove & Snowdrop Walk to the North, Buttercup Avenue to the East, Buttercup Avenue, Marigold Avenue & Marigold Park to the South and Our Lady Immaculate Church to the West.

This report is intended to specify the design rationale behind the subject proposal; identify compliance with relevant National, Regional and Local Planning Policy Documents; and provide a detailed description of the proposal.

1.1 Applicant and Design Team

The Part 8 Proposal has evolved following input from the project design team. The design team and projects inputs are now listed below:

- **Brock McClure Planning and Development Consultants (BMC)** – Full suite of Part 8 Proposal materials, Planning Report, Building Lifecycle Report and Operational Management Strategy, Community & Social Infrastructure Audit
- **PKA Architects (PKA)**– Full suite of Architectural Drawings & Register, Design Statement, Housing Quality Assessment
- **Hayes Higgins Partnership (HHP)** – Full suite of Engineering Drawings, Engineering Services Report, Construction Waste Management Plan, Mobility Management Plan, Road Safety Audit, Traffic & Transport Assessment
- **IE Consulting** – Flood Risk Assessment
- **JBA Consulting (JBA)** – Landscape Drawing Pack, Landscape Design Report, Appropriate Assessment Screening Report, Ecological Impact Assessment Report
- **AWN Consulting** - Construction Environmental Management Plan, Operational Waste Management Plan
- **Digital Dimensions** - Photomontage Booklet CGIs & Verified Views, Daylight/Sunlight & Shadow Assessment
- **Seample McKillop (SMK)** – Climate Action & Energy Statement, Site Lighting Design and Report

The various inputs from the design team are referenced where relevant within this report.

1.2 Legislative Context

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 the undertaking of development by, on behalf of, or in partnership with, the Local Authority. Under Sections 178 and 179 of the Planning and Development Act 2000 (as amended), the Local Authority is entitled to carry out its own development, provided that it shall not materially contravene the Development Plan.

We wish to highlight from the outset, that the subject Part 8 proposal now brought forward has been subject to Dublin City Council’s Pre Part 8 Procedure Process, which involved the undertaking of a 6





Stage Consultation process with the Dublin City Housing, Planning, Environment & Transportation – Drainage Services, Roads & Traffic and Parks Landscapes Services Departments, and it is considered that the Part 8 proposal brought forward now represents the most sustainable form of development on the subject site, and represents a positive move towards the delivery of much needed housing within the jurisdiction of Dublin City Council.

1.3 Respond Housing Association

This Part 8 proposal is being brought forward by Dublin City Council, in partnership with Respond Housing Association. Respond Housing Association are a construction-led Approved Housing Body and service provider, has been working all around Ireland for over 40 years.

17,008 tenants live in 7,761 properties across Ireland that are owned or managed by Respond Housing Association. Respond also provide a range of services for families and individuals within their communities. This includes emergency accommodation with 24/7 support for families who are homeless in six Family Homeless Services, three Day Care Services for Older People, 15 Early Childhood Care and Education, Family Support and Refugee Resettlement services. Respond Housing Association's aim is to provide person centred services to support people to achieve their goals and reach their full potential.



2 Subject Site

The development area consists of a Spine Site of c. 1.49 ha at Darndale, Dublin 17. The site is generally bound by Primrose Grove & Snowdrop Walk to the North, Buttercup Avenue to the East, Buttercup Avenue, Marigold Avenue & Marigold Park to the South and the Church of Mary Immaculate to the West. The site is currently greenfield and features no existing development. The extent of the subject site is shown on Figure 1, which depicts an aerial image of the site, outlined in red:

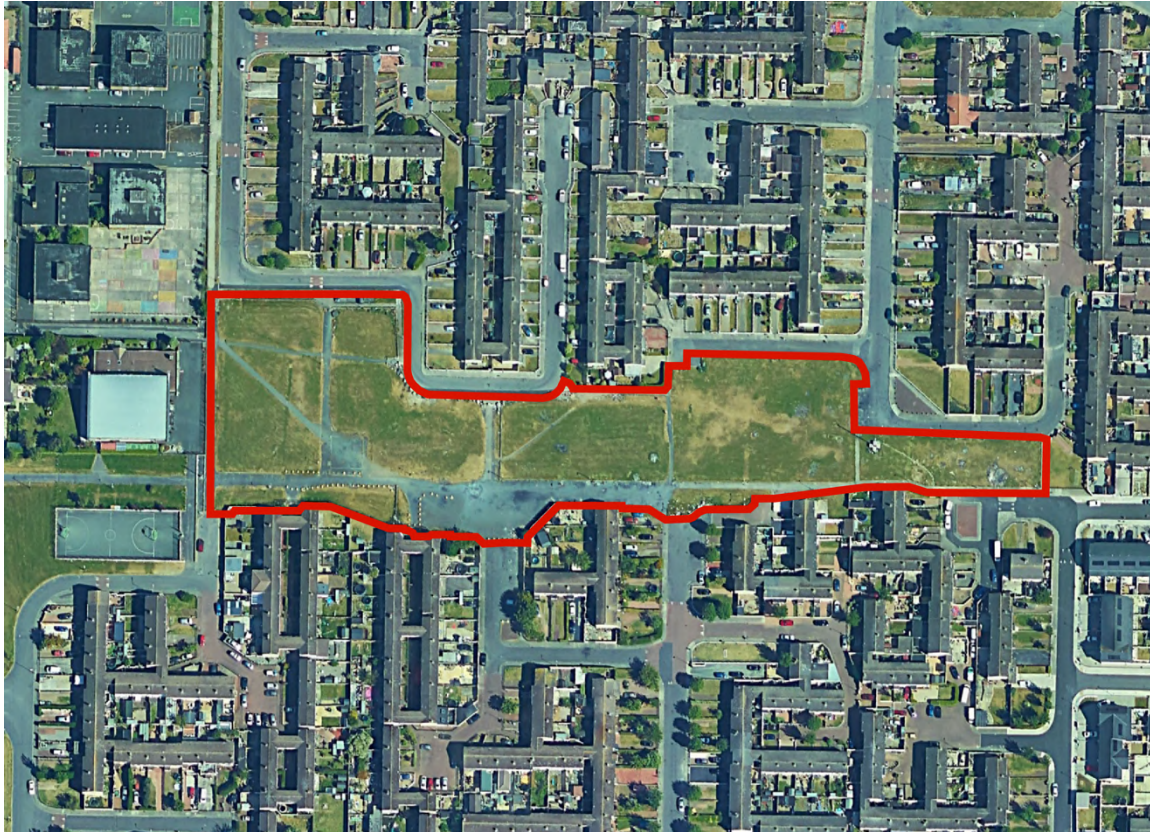


Figure 1 – Site Aerial (Subject Site Outlined in Red)

The site is bound by 2 storey residential development to the north, east and south. To the west the site is bound by Darndale Junior School and the Lady Immaculate Church. Access to the development site for vehicles is from Primrose Grove and Snowdrop Walk to the north, and Buttercup Avenue to the south.

The site northern boundary runs for approximately 350 metres and is bound by an existing two way vehicular carriageway which extends the majority of this site boundary. The road way is broken along the northern site boundary by existing 2 storey dwellings at Primrose Grove, which creates 2 no. cul de sacs along the northern boundary, allowing pedestrian access only along the extent of the boundary. 2 storey residential dwellings front onto the site across the vehicular carriageway along Primrose Grove and Snowdrop walk for the extent of the boundary.

The site southern boundary extends approximately 310 metres and is bound by an existing pedestrian pathway, areas of hardstanding and boundary walls and gables associated with 2 storey residential dwellings at Buttercup Avenue, Buttercup Terrace, Marigold Park and Marigold Crescent along the extent of this boundary.



The site western boundary extends approximately 80 metres and is bound by an existing pedestrian pathway and the boundary wall and fencing associated with the Our Lady Immaculate Church, which bounds the site to the west.

The site eastern boundary extends for approximately 15 metres and is bound by an existing pedestrian pathway and a grass verge to the front of the gardens of 2 storey dwellings at Snowdrop Walk, which front the development along the eastern boundary.

The site benefits from its well-connected location, close to public transport links. The closest bus stop to the subject site is Belcamp Lane (stop ID 6115) located 250 metres to the east of the site along Malahide Road and Priorswood Road (Stop ID 1258) located 250 metres to the south of the site along Priorswood Road. These stops are served by a number of high frequency bus routes providing connections from the subject site as follows:

- Bus Route 15 – Ballycullen Road to Clongriffin
- Bus Route 27 – Jobstown to Clarehall
- Bus Route 27X – Clarehall to UCD Belfield
- Bus Route 42 – Talbot Street to Sands Hotel Portmarnock
- Bus Route 43 – Talbot Street – Swords Business Park

Clongriffin Train Station is located approximately 2.5 km to the east of the subject site and offers Dart connection towards Greystones and Malahide and InterCity Train Connections to Drogheda and Dundalk.

The R139 road is located c. 500 metres to the north of the site, which provides a direct connection for vehicles to the M50 and M1, 2.5 km to the west of the site providing direct connections towards Dublin Port, Shankill, and Dundalk, as well as connections to other significant National Roads.

The below figure 2 provides an overview of public transport links including bus and rail routes, and major roadways within 2.5km of the subject site:



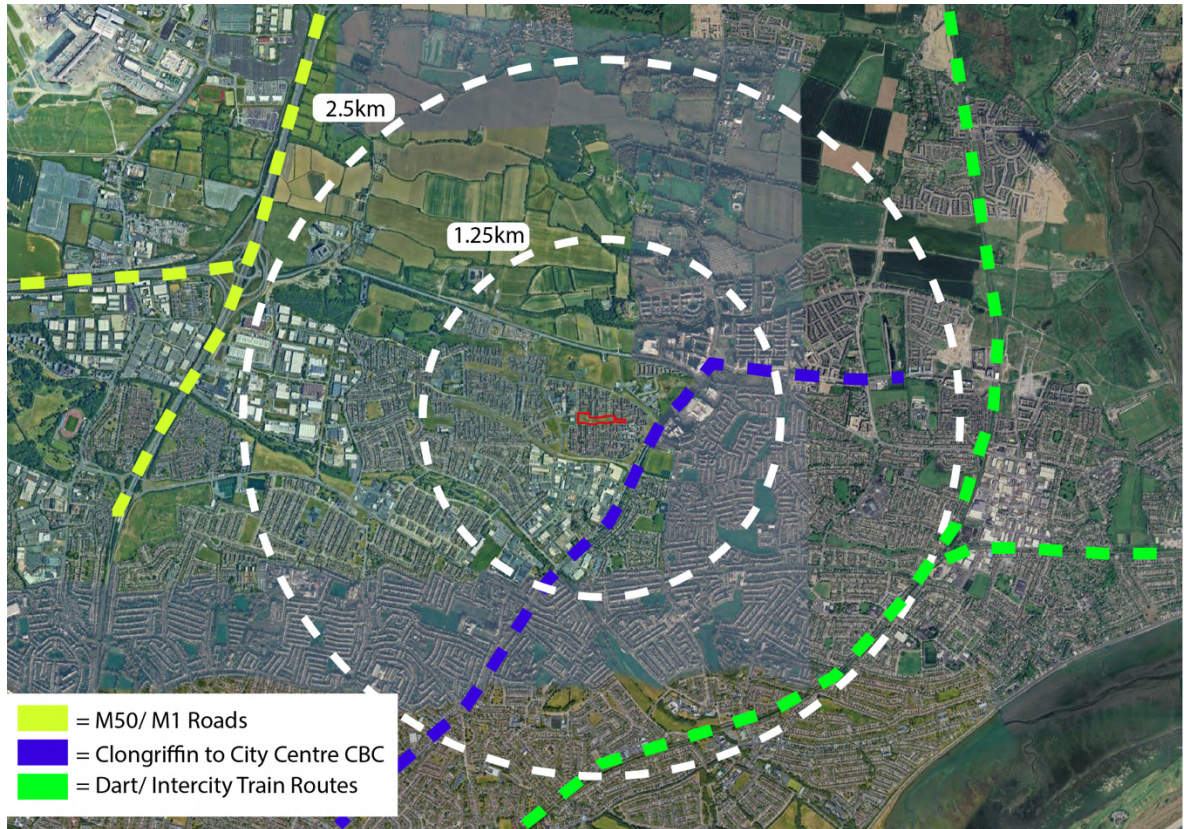


Figure 2 – Surrounding Amenities within 2.5km of subject site

The Malahide Road to the east of the site forms part of the Clongriffin – City Centre Core Bus Corridor Route. The below Figure 3 provides an overview of the site location in the context of this permitted Bus Connects route, which will further increase the frequency of buses, and decrease travel times, from the subject site towards Dublin City Centre:

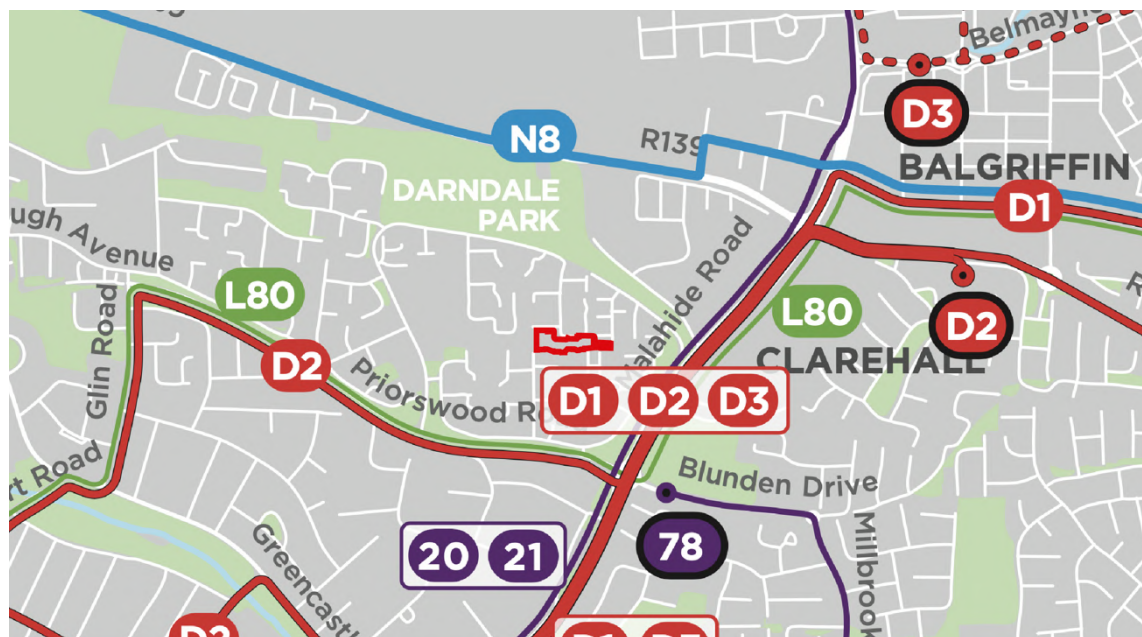


Figure 3 – Bus Connects Routes

It is evident from the above map that a number of new routes will be implemented surrounding the subject site, most significantly, the D-Spine routes 1, 2 and 3, which are envisaged to provide frequent bus connections from the Darndale, Balgriffin and Clarehall areas towards Dublin City Centre.

An abundance of high quality landscaped public open spaces featuring playing fields, seating areas and defined walking routes are located within 2.5km of the subject site. The below figure 4 outlines the site location in relation to nearby areas of significant publicly accessible open space areas:



Figure 4 – Publicly Accessible Areas of Open Space within 2.5km of the subject site

These include but are not limited to Darndale Park, Belcamp Park, Fr. Collins Park, Stardust Memorial Park, Glin Park, Coolock Lane Park and Donahies Field. Additionally, there are multiple smaller areas of publicly accessible open space areas associated with existing residential developments located within approximately 2.5km of the subject lands.



3 Planning History

This section is intended to outline the planning history of the subject site and surrounding sites considered relevant in the context of the proposed development.

3.1 Subject Site

There is no recent relevant planning history associated with the subject site.

3.2 Surrounding Area

Previously lodged planning applications in the area immediately surrounding the site are primarily minor applications for alterations and extensions to residential units. The following applications in the surrounding area show larger commercial scale developments proximate to the development site:

- **DCC Reg Ref. 1099/97** – Permission **GRANTED** in July 1997 for renovation, alterations and new roof structure at the Parish Centre Building adjoining Sports Hall, Darndale Parish Site, Darndale,, Dublin 17.
- **DCC Reg Ref. 0299/99** – Permission **GRANTED** in March 1999 for 2 no. prefabricated classroom buildings and horticultural polytunnel for seed propagation at Darndale Primary School, Tulip Court, Darndale, Dublin 17.
- **DCC Reg Ref. 0424/00** – Permission **GRANTED** in May 2000 for a three storey science technology and office building and ancillary site work at the junction of Northern Cross Route, Extension and Malahide Road, Balgriffin,, Dublin 17.
- **DCC Reg Ref. 3551/04** – Permission **GRANTED** in August 2004 for a New pedestrian access gate to existing fence with keypad control and access path onto the North Cross Route Extension (N32) at Newtown Court, Belcamp Lane, Dublin 17, fronting onto Northern Cross Route Extension (N32).
- **DCC Reg Ref. 5125/07** – Permission **GRANTED** in October 2007 for a first floor office extension at Darndale/Belcamp Village Centre, Belcamp Road, Dublin 17.

It is considered that the Planning History for the surrounding area shows that Darndale and the immediate surrounding area is an established residential settlement with a village centre. No recent developments relating to the provision of commercial or large residential development have been brought forward in the area. It is considered that the subject development respects the existing site context and presents a unique opportunity to revitalise the established residential area.

The proposed development contributes towards the delivery of medium density development in an appropriate location adjacent to Darndale/ Belcamp Village Centre and a Core Bus Corridor along the Malahide Road. The proposal will ensure that the subject site is redeveloped to provide an appropriate type of development at an appropriate density, consistent with the requirements as outlined in the Compact Settlement Guidelines.



4 Departmental Pre Part 8 Comments

This section has been prepared to demonstrate how comments received from the Dublin City Council Senior Planner within their Pre Part 8 Submission Report prepared in respect of a residential development of 84 no. units on lands known as the ‘Spine Site’ at Darndale, Dublin 17, have been addressed within this final Part 8 Application Pack. The Pre Part 8 Submission Report prepared by the Dublin City Council Planning Department in respect of the subject proposal identified 9 no. key items to be addressed within any forthcoming full Part 8 Application. We now wish to detail each of these items below, and provide a response to each:

4.1 Item 1 – Accompanying Drawings/ Plans/ Reports

“The proposed development has low density, plot ratio and site coverage for its location as set out in the Dublin City Development Plan 2022-2028 Appendix 3 and the Development Plan generally promotes and supports increasing residential density across the city. It is considered that the apartment block may benefit from the addition of one or more additional storeys which would help to create a building of local prominence as well as increase the density and provide additional much needed housing.

Given the communal open space is comfortably in excess of its area per unit requirement there is potential to add further dwelling units to the block while still providing a good standard of communal open space for all residents. Furthermore it is considered that the apartment block, as designed and with potentially additional floors, would not impact unduly on existing residential amenities. The proposing department is requested to consider the potential to achieve this increase.”

Proposing Department Response:

In response to this item, it is noted that the proposing department has now agreed with the Senior Planner that the height of the proposed apartment element of the development is appropriate at 3 no. storeys, and no additional height will be proposed at this location as part of the forthcoming formal Part 8 application.

It is submitted that the height of the proposed apartment element of development on the site, at 3 no. storey, has arisen following a series of public consultation sessions as follows:

- Community Consultation Meeting 9th July 2024
- Public Community Consultation Meeting 10th January 2026
- Darndale Closed Residents Consultation Meeting 27th March 2026
- Darndale Closed Residents Consultation Meeting 6th June 2026

The Part 8 proposal design has been informed by the subject site, surrounding area, community consultation feedback and ensuring compliance with all relevant National, Regional and Local Planning Policy documents.

The scheme originally presented to the community for comment in 2024 included a 4-5 storey apartment element of development on the site, where the 3 storey apartment block currently proposed is located. Concerns were raised by residents of the surrounding Darndale area that a proposal of this height was out of character with the existing low rise pattern of development in Darndale, and represented overdevelopment of this area of the site. The proposing department has a commitment to



providing a development that is resultant of collaborative feedback with the existing community in the area surrounding the site, who will interact with the development daily, and therefore it was considered appropriate to reduce the height of the apartment element on the site to the now proposed 3 no. storeys.

The development, with the 3 no. storey apartment element proposed, was presented at the public consultation sessions held in respect of the proposal in January and March 2026. It is noted that there were no comments received at these public consultation sessions from residents of the Darndale area in respect of the 3 storey element of development proposed, and therefore it is considered that the 3 storey height adequately responded to concerns raised at previous public consultation sessions regarding the proposal height. The proposed 2-3 storey development, providing 2 storey residential houses and a 3 storey apartment element, has been designed to respond to, and assimilate with, the surrounding existing residential developments at Primrose Grove & Snowdrop Walk to the North, Buttercup Avenue to the East, Buttercup Avenue, Marigold Avenue & Marigold Park to the South and the Church of Mary Immaculate to the West.

The arrangement of the proposed development across the site, providing 4 no. development blocks, ranging in height from 2- 3 storey, means that the perception of massing on the site is broken up, and will not appear monolithic when viewed from its surrounds. It is considered that the proposed height on the site protects the existing residential context surrounding the site, mitigating against any overbearing, overlooking or over massing impacts that may have arisen should taller buildings be proposed at this location.

It is considered that the proposed Part 8 scheme, consisting of 84 no. units total, inclusive of the apartment element of development at 3 no. storeys, meets the density requirements applicable to the site as included within the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024). The density of the development has been calculated in accordance with the requirements of Appendix B: Measuring Residential Density of the Sustainable Residential Development and Compact Settlement Guidelines.

In terms of categorisation, the subject site can be defined as a ‘**City – Urban Neighbourhoods**’ site which is defined in the guidelines as follows:

*‘The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) **lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8)** – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. **It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.***

The density is based on the provision of 84 no. units on a net site area of 1.4738 ha which provides a density of approx. 57 units per hectare (Net) and is considered appropriate given applicable density range of 50-250 units per hectare as included within the Guidelines, the development design which has been refined to appropriately assimilate with, and respond to, its immediately surrounding context, and the proximity of the site to planned public transport links.



Appendix 3 of the Dublin City Development Plan 2022-2028 outlines indicative plot ratio and site coverage figures for specific areas. For development in Outer Employment and Residential Areas the following indicative figures are noted:

- Plot Ratio – 1.0 – 2.5
- Site Coverage – 45 – 60%

The plot ratio of the proposal is c.0.64 with a site coverage of c. 26%. Whilst the proposed plot ratio is below the indicative ratio of 1.0 – 2.5 included in the Plan, it is considered that this has arisen from a requirement to provide a development on the site that appropriately assimilates with its surrounds and protects the existing amenity levels of surrounding properties. In this regard, it is explicitly noted that the figures included for plot ratio and site coverage within the Dublin City Development Plan are indicative only. As the proposed development is located within an existing residential setting, the design of the scheme required the creation of new vehicular and pedestrian links through the site, a byproduct of which is a lower plot ratio and site coverage figure. In this regard, it is therefore considered that the proposed plot ratio and site coverage level is wholly appropriate.

Appendix 3 of the Dublin City Development Plan 2022-2028 outlines the following general density range for developments within the ‘Outer Suburbs’ that will be supported:

- 60-120 Net Density Range (Units Per Hectare)

The proposed development provides a net density of 57 dph as per the density calculation requirements included within the Sustainable Residential & Compact Settlements Guidelines. It is considered that this density is generally in line with the density ranges applicable to the subject site included within the Dublin City Development Plan 2022-2028, having regard to the specific site context.

The current Part 8 scheme design has been discussed between the Dublin City Council Housing Delivery, Development & Regeneration Department and the Planning Department, and the rationale proposed for maintaining the 3 storey element of development on site, and providing a development of the subject density, plot ratio and site coverage has been accepted by the Dublin City Council Planning Department.

4.2 Item 2 – Accompanying Drawings/ Plans/ Reports

“Further information should be provided on the operation and management of the community hub, how the spaces would be used, including booking and whether this space is for the benefit of residents of the scheme or the wider community.”

Proposing Department Response:

In response to this item, the scheme, when constructed, will be owned and operated by Dublin City Council in Partnership with Respond Housing Association. It is submitted that the space at the ground floor level of the apartment element of the development, in the north west corner of the site, will be used as a Community Hub area. This will be a multipurpose indoor space that can provide for, and host, a range of activities and be booked for use by local clubs and societies for classes, information events and demos, as well as used by the residents of the proposed residential element of the development.



4.3 Item 3 – Accompanying Drawings/ Plans/ Reports

“The drawings and reports should confirm that floor-to-ceiling heights conform with national guidance set out in SPPR4.”

Proposing Department Response:

In response to this item, it is noted that Specific Planning Policy Requirement 4 as included within the Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025) is detailed as follows:

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

We now wish to confirm that all ground floor apartment floor to ceiling heights are provided at a minimum of 2.7m in accordance with SPPR 4. Please refer to Drawing no. 2330/ PA/009/F – Proposed Elevations 3 – Apartment Block, prepared by Paul Keogh Architects, which includes a sectional detail demonstrating compliance with the requirements of SPPR4.

4.4 Item 4 – Accompanying Drawings/ Plans/ Reports

“For both apartments and houses, while meeting storage requirements, some of the indicated storage areas are provided along with the hot press or within bathrooms. Storage should ideally be provided off hallways and in main daytime habitable rooms and is considered separate to the provision of wardrobes. This issue should be considered and drawings amended as appropriate. It should also be demonstrated that adequately sized wardrobes can be provided to each bedroom.”

Proposing Department Response:

In response to this item, it is submitted that Paul Keogh Architects have now revised the layouts of the houses and apartments proposed, to ensure that storage spaces are not provided along with the hot presses provided, or within bathrooms. All storage spaces provided have now been arranged to be provided off living spaces. Wardrobe space is indicated in all bedrooms shown for the proposed apartments and houses. Please refer to the following drawings prepared by Paul Keogh Architects for details:

- Drawing no. 2330/PA/003/G – Apartment Block – Ground Floor Plan
- Drawing no. 2330/PA/004/F – Apartment Block – First Floor Plan
- Drawing no. 2330/PA/005/F – Apartment Block – Second Floor Plan
- Drawing No. 2330/PA/ 010/F – Housing Block 1 – Ground Floor Plan
- Drawing No. 2330/PA/ 011/F – Housing Block 1 – First Floor Plan
- Drawing No. 2330/PA/014/F – Housing Block 2 – Ground Floor Plan
- Drawing No. 2330/PA/015/F – Housing Block 2 – First Floor Plan
- Drawing No. 2330/PA/018/F – Housing Block 3 - Ground Floor Plan
- Drawing No. 2330/PA/019/F – Housing Block 3 – First Floor Plan





- Drawing No. 2330/PA/022/B – Proposed Unit Plans – Apartment Unit Type A & D
- Drawing No. 2330/PA/023/B – Proposed Unit Plans – Apartment Unit Type B, C & E
- Drawing No. 2330/PA/024/B – Proposed Unit Plans – Apartment Unit Type F & G
- Drawing No. 2330/PA/025/a – Proposed Unit Plans – House Type A & B
- Drawing No. 2330/PA/026/A – Proposed Unit Plans – House Type C & D
- Drawing No. 2330/PA/027/A – Proposed Unit Plans – House Type E & F
- Drawing No. 2330/PA/028/A – Proposed Unit Plans – House Type G & H
- Drawing No. 2330/PA/29A – Proposed Unit Plans – House Type J & K

4.5 Item 5 – Accompanying Drawings/ Plans/ Reports

“There is some concern with regard to both the accessibility and passive surveillance of the bicycle stores to the apartment block which may only be accessed from the public street, are visually impermeable and are not overlooked by adjacent apartment dwellings. The design should be modified to allow internal access, greater visibility and better surveillance.”

Proposing Department Response:

In response to this item, Paul Keogh Architects have now revised the proposal design to ensure that the proposed bin stores and bicycle stores for the apartment element of the development can be accessed from both the street, and the shared communal courtyard area. Please refer to the following drawings prepared by Paul Keogh Architects for details:

- Drawing no. 2330/PA/003/G – Apartment Block – Ground Floor Plan
- Drawing no. 2330/PA/030/A – Community Facility Ground Floor Plan/ Apartment Service Core Ground Floor Plan

4.6 Item 6– Accompanying Drawings/ Plans/ Reports

“Drawings for boundary enclosure treatments to gardens as they relate to public streets and the access to the communal apartment courtyard do not appear to have been provided as yet. In the case of the two easternmost Type D and the Type F units these houses back onto Buttercup Avenue and any boundary at this location, in particular, should be robust, hard wearing and visually attractive.”

Proposing Department Response:

In response to this item, the request for drawings for boundary enclosure treatment drawings has been noted by Paul Keogh Architects. Details of boundary treatments proposed at the noted locations are shown on Drawing no. :2330 / PA / 021 / A – Proposed Elevations – Housing Block 03, on the Housing Block 03 Elevation CC and Housing Block 03 Elevation DD drawings. Please refer to these drawings for details.





4.7 Item 7 – Technical Department Responses

“It is recommended that the Design Team continues to meet with internal Technical Departments in order to address and agree any outstanding matters prior to the lodgement of the Part 8.”

Proposing Department Response:

In response to this item, we wish to confirm that the design team has continued to meet with all relevant Dublin City Council Technical Departments, to address and agree final arrangements in respect of any outstanding matters prior to making this full Part 8 Application. The Proposing Department has endeavoured to comprehensively all comments received from the Planning Department, City Architect, Drainage Planning Policy & Development Control Department, Transportation Planning Division, Public Lighting & Electrical Services Division, Technical Support Division, Power Operated Units Division, Parks, Biodiversity & Landscape Services Division and the City Archaeologist, within this final Part 8 Application Pack, throughout all application material now submitted.

4.8 Item 8 – Technical Department Responses

“The proposing department is requested to ensure that all Technical Departments have responded with relevant comments which are to be addressed or where no issues are identified, a report to this effect must be sent to the Proposing Department by the relevant Technical Department.”

Proposing Department Response:

In response to this item, we wish to re-iterate the response provided in respect of Item 7 above, and confirm that the design team has continued to meet with all relevant Dublin City Council Technical Departments, to address and agree final arrangements in respect of any outstanding matters prior to making this full Part 8 Application. The Proposing Department has endeavoured to comprehensively all comments received from the Planning Department, City Architect, Drainage Planning Policy & Development Control Department, Transportation Planning Division, Public Lighting & Electrical Services Division, Technical Support Division, Power Operated Units Division, Parks, Biodiversity & Landscape Services Division and the City Archaeologist, within this final Part 8 Application Pack, throughout all application material now submitted.

4.9 Item 9 – Other Matters

“A final copy of the draft site and newspaper notices should be issued to the Planning department for review, prior to submission of the Part-8 application.”

Proposing Department Response:

In response to this item, we wish to confirm that in accordance with Step 7 of the Dublin City Council Pre Part 8 Procedure document, prior to the lodgement of the Part 8 Application, the Proposing Department issued a draft copy of the site and newspaper notice to the Planning Department for review. Notices are provided in both Irish and English.



5 Proposed Development

The proposed development will provide 84 no. new residential units (50 no. apartment units and 34 no. residential houses) across 5 no. development blocks on the subject site. The breakdown of units to be provided is detailed below for the benefit of Dublin City Council:

- 45 no. 1 bed apartment units
- 5 no. 2 bed apartment units
- 12 no. 2 bed houses
- 21 no. 3 bed houses
- 1 no. 4 bed house

The proposed site layout is shown on figure 5 below for the benefit of the Planning Authority:



Figure 5 – Site Layout Plan

The scheme has been specifically designed to respond to the surrounding existing urban context, providing a residential development mix that is appropriate for the area, and building designs ranging in height from 2 – 3 storeys that respect the existing surrounding primarily 2 storey residential context.

The proposal provides numerous sizes and layouts of units to be provided, as detailed on the Housing Quality Assessment and Schedule of Accommodation documents prepared by PKA Architects. All units provided comply with the standards for design as included within the Design Standards for Apartments, Guidelines for Planning Authorities (July 2025), the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) and the specific guidelines for ‘standard internal layouts’ for houses within the Department of Housing, Local Government and Heritage Design Manual for Quality Housing (Section 5.9).

The development provides a total gross internal floor area of 9513 sq.m, the total site area is approximately 14875 sq.m.

The plot ratio of the proposal is 0.64 with a site coverage of 26.4%. The plot ratio and site coverage levels provided are generally in line with the indicative levels of 1.0 – 2.5 and 45-60% as included in Appendix 3 of the Dublin City Development Plan 2022-2028. Whilst the proposed plot ratio is below the indicative ratio of 1.0 – 2.5 included in the Plan, it is considered that this has arisen from a requirement to provide a development on the site that appropriately assimilates with its surrounds and protects the existing amenity levels of surrounding properties. In this regard, it is therefore considered that the proposed plot ratio and site coverage level is wholly appropriate.



Communal open space is provided for the apartment units proposed within a landscaped shared courtyard for the apartments. No communal open spaces are proposed above ground floor level. c. 337 sq.m of communal open space is provided across the development site, which exceeds the minimum requirement for communal open space for the apartment element of the development by 77 sq.m. A minimum of 45 x 5 sq.m for the 1 bed apartments and 5 x 7 sq.m for the 2 bed apartments is required, totalling 260 sq.m.

95 no. cycle parking spaces are provided for the apartment element of the development. This exceeds the minimum required quantum of 1 no. space per bedroom and 1 no. visitor space per 2 no. apartment units for the 45 no. 1 bed apartment units and 5 no. 2 bed apartment units proposed. 34 no. of the units provided are houses with rear ground floor level open space. Bicycle storage for these units will be provided within the ground floor level private open space. This is in line with SPPR 4 of the Compact Settlement Guidelines, which outlines that *'in the case of residential units that **do not have ground level open space** or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied'*. 7 no. visitor cycle parking spaces for the houses provided are included within the public realm areas proposed.

The proposal is described as follows within the statutory notices:

- Construction of a 2-3 storey residential development comprising 84 no. new units arranged across 4 no. blocks on the site (1 apartment block and 3 no. terraced housing blocks). The proposed units include 45 no. 1 bed apartment units and 5 no. 2 bed apartment units in a 3 storey block and 34no. 2 storey houses (14no. 2 bed, 19, no. 3 bed, 1no. 4 bed). A community facility (c. 86 sq.m) is provided at ground floor level of apartment Block A.
- All apartment units and houses are provided with private open space in the form of balconies/ terraces and gardens.
- The development includes the provision of public realm upgrade works to footpaths and roads, including the provision of new through roads connecting Marigold Crescent, Marigold Park and Buttercup terrace to the south of the site to Primrose Grove, and Snowdrop Walk to the north of the site.
- The proposal includes the provision of 79 no. onstreet car parking spaces and 102 no. cycle parking spaces throughout.
- c.337 sq.m of communal amenity open space is provided in the form of a landscaped courtyard area within the proposed apartment block.
- The proposed development will include the provision of all associated public lighting, provision of plant and PV panels and blue/ green roofs for the apartment blocks, hard and soft landscaping and boundary treatments, attenuation proposals, all associated infrastructural and site development works above and below ground and associated connections to services (foul and surface water drainage and water supply) on a site of c. 1.49ha.





5.1 Detailed Description

The residential development provides 84 no. new units (34 no houses and 50 no apartments) and a community hub space arranged in 5 no development blocks on the site as follows:

Block	Ground Floor	First Floor	Second Floor
(Apartments)	Community Facility Bicycle Store Bin Store Plant Space 7 no. 1 bed apartment units 1 no. 2 bed apartment unit	7 no. 1 bed apartment units 1 no. 2 bed apartment unit	7 no. 1 bed apartment units 1 no. 2 bed apartment unit
(Apartments)	Community Facility Bicycle Store Bin Store Plant Space 10 no. 1 bed apartment units	7 no. 1 bed apartment units 1 no. 2 bed apartment unit	7 no. 1 bed apartment units 1 no. 2 bed apartment unit
1 (Houses)	6 no. 3 bed Houses		
2 (Houses)	7 no. 3 bed houses		
3 (Houses)	12 no. 2 bed houses 8 no. 3 bed houses 1 no. 4 bed house		

Height

The project design team have carefully considered the height of the proposed development and its relationship with surrounding existing developments. The proposed development is presented in 5 no. blocks on the subject site, which range in height from 2-3 storeys. The proposal is c. 10.95 metres in height at its tallest point, at the parapet of Apartment Blocks 1 and 2.

The 2-3 storey height of the development has been informed by the surrounding development context. The proposed height allows for a medium density housing and apartment development to be provided on the subject site, whilst also protecting the residential amenity of the existing 2 storey houses surrounding the site along Primrose Grove, Snowdrop Walk, Marigold Park, Buttercup Drive and Buttercup Avenue, which surround the site to the north, south and east. It is considered that a taller development at this location would present overlooking, overbearing and overshadowing impacts to surrounding existing development. A selection of the proposed elevations, prepared by PKA Architects, are included below for the benefit of the Planning Authority:



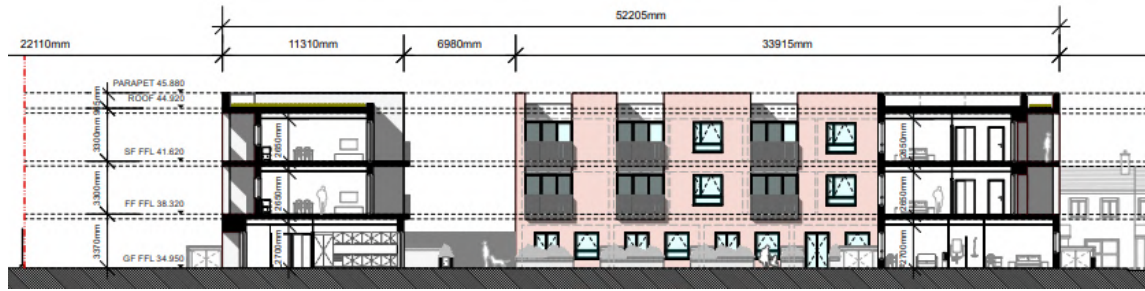


Figure 6 – Apartment Elevations AA

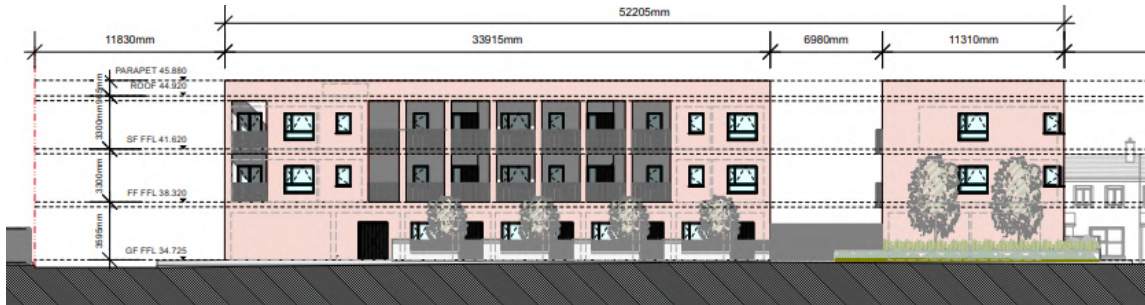


Figure 7 – Apartment Elevations BB



Figure 8 – Housing Block 1 Elevation DD



Figure 9 – Housing Block 2 – Elevation CC



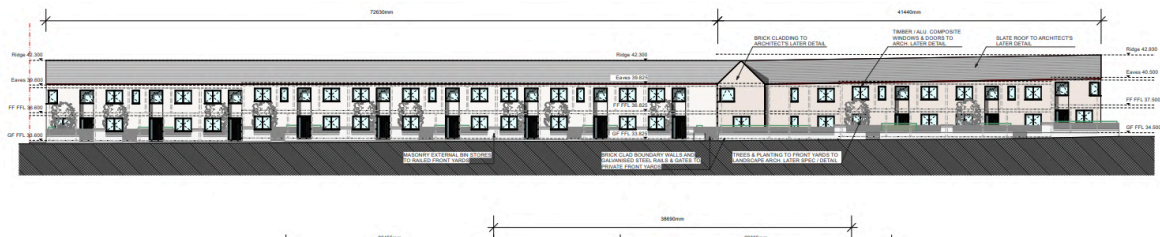


Figure 10 – Housing Block 3 – Elevation BB

The proposed development site is currently a greenfield area, located within the centre of Darndale. This is an unmanaged area of informal public open space, which forms a spine through the centre of the surrounding housing estate. It is submitted that the proposal design, which ranges in height from 2-3 storey on the site, does not present a development form that is out of character with the immediate surrounding area.

The now proposed development height allows for a 57 units per hectare development to be provided on the site whilst also protecting the residential amenity of surrounding existing developments from any overlooking, overbearing or over massing impacts that may have arisen should taller buildings be proposed at this location. It is considered that any building heights above 3 storeys of the subject site have the potential to give rise to negative impact on the amenity experienced by surrounding existing residential developments.

It is submitted the height is appropriate for the site, having regard to the site location, mitigation measures incorporated in the design of the proposed building to prevent overlooking, including the location of proposed balconies and windows above ground floor level facing away from any surrounding residential development close to site boundaries, and the separation distances achieved to neighbouring properties.

The site is located within an established residential area, on appropriately zoned lands and is considered an ideal location in which to provide much needed social housing units.

A Daylight/ Sunlight and Shadow Analysis has been carried out by Digital Dimensions in respect of the proposed 2-3 storey development to assess internal scheme performance and impact to surrounding neighbours. Verified View Photomontages prepared by Digital Dimensions are also submitted to the Planning Authority, offering a realistic depiction of how the development will successfully assimilate into its surroundings once constructed.

We refer the Planning Authority to the Shadow Analysis prepared by Digital Dimensions and Verified View Photomontages, also prepared by Digital Dimensions submitted as part of this Part 8 proposal pack, which assess the impact of the proposed development in terms of overshadowing on surrounding neighbouring properties.

Communal Amenity Space

The proposed scheme offers 45 no. 1 bed apartment units and 5 no. 2 bed apartment units meaning that 260 sq.m of communal outdoor amenity space must be provided as a minimum requirement. The proposal far exceeds this minimum requirement, providing c. 337 sq.m of communal outdoor amenity space across the development site, arranged as a landscaped courtyard area between the apartment blocks provided. The proposed communal amenity space has been designed by JBA Consulting and provides planted areas, pathways, seating areas and hard and soft landscaping throughout the site. The

Landscape Masterplan, prepared by JBA Consulting is shown on the below figure for the benefit of the Planning Authority:



Figure 11– Landscape Masterplan

We refer the Planning Authority to the Landscape Architects drawing pack, prepared by JBA Consulting for details.

Community Hub

In addition to the provision of outdoor communal amenity space provided, the development also proposes the inclusion of a community hub space at ground floor level of Apartment Block A, which can be used by the residents of the proposed development, or can potentially be booked by local community groups to host events etc.

Public Open Space

The site is located within 2.5km of an abundance of high quality landscaped public open spaces featuring playing fields, seating areas and defined walking routes, including some of the most significant public open space areas in Dublin. These include, but are not limited to, Darndale Park, Belcamp Park, Fr. Collins Park, Stardust Memorial Park, Glin Park, Coolock Lane Park and Donahies Field. Additionally, there are multiple smaller areas of publicly accessible open space areas associated with existing residential developments located within approximately 2.5km of the subject lands, as shown on figure 4 included within this report.

The site is currently greenfield and used as an incidental area of public open space. The proposed development replaces this area of public open space with a new residential development featuring private balconies, terraces and communal open spaces for the units provided. It is submitted that the removal of this area of open space is wholly appropriate in this case, given that the area has been subject to longstanding management and anti-social behaviour incidents. A specific objective relating to the development of the subject open space area is included within the Dublin City Development Plan 2022-2028 in Chapter 5 Quality Housing and Sustainable Neighbourhoods Objective QHSNO3 which states that it is an objective of Dublin City Council:

‘To undertake a study of peripheral open space areas in Darndale to examine their potential for intensification for infill housing and positive social community facilities or spaces and to create opportunities for enhanced streetscapes’.

The removal of public open space at this location has been subject to community engagement, engagement with Dublin City Council and An Garda Síochána, who are supportive of this proposal. It is considered that Darndale Park to the north of the development site provides quality public open space

which is maintained and managed. Any residents of the proposed development or the surrounding existing developments, have immediate access to Darndale Park to the north of the Darndale estate.

We trust that the Planning Authority will have consideration for this when assessing the subject development.

Private Open Space

All apartment units are provided with areas of private open space in the form of balconies that meet or exceed the standards set out in the Design Standards for Apartments – Guidelines for Planning Authorities (July 2025). All houses provided are with private gardens that meet or exceed the requirements outlined in the Sustainable Residential Development and Compact Settlements Guidelines: Guidelines for Planning Authorities.

Car Parking

79 no. car parking spaces are proposed for the subject development of 84 no. units total, including 6 no. accessible car parking spaces. The site is located within an area noted as ‘Parking Zone 3’ as included on Map Set J of the Dublin City Development Plan 2022-2028.

Access

The subject site is currently greenfield and can be accessed from any point along the northern, eastern, western and southern boundaries by pedestrians. There is currently no access for vehicles onto or through the subject site. As part of the subject development, it is proposed to provide public realm upgrades to provide new through roads and pedestrian footpaths across the subject site, connecting Marigold Crescent, Marigold Park and Buttercup terrace to the south of the site to Primrose Grove, and Snowdrop Walk to the north of the site. The proposed roads layout through the site has been designed by Hayes Higgins Partnership in consultation with the Dublin City Council Transportation Planning Division. The proposed roads and public footpaths layouts on the subject site is shown below for the benefit of Dublin City Council:

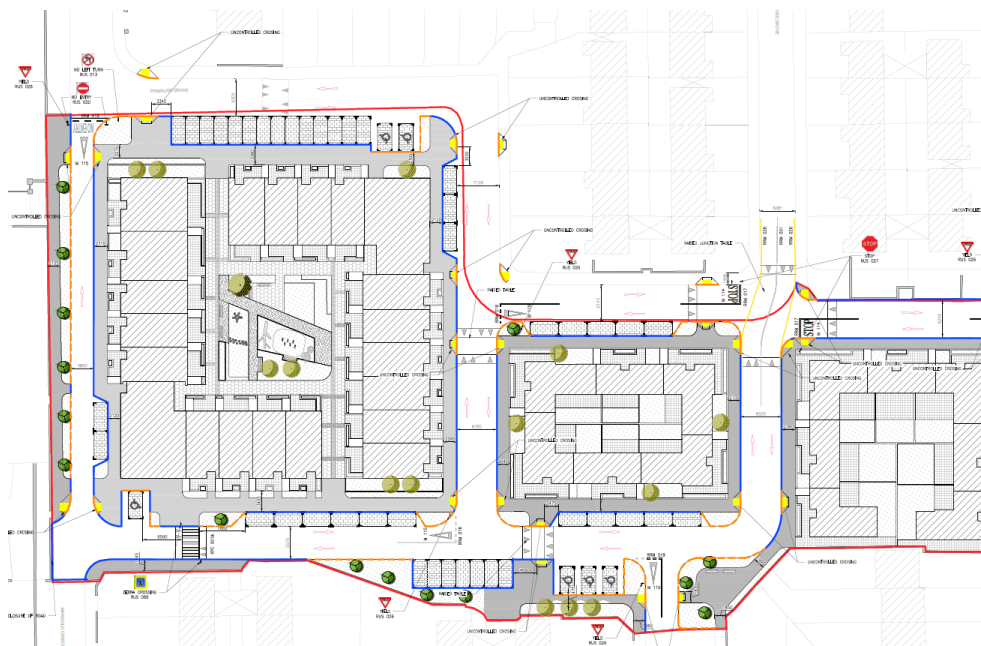


Figure 12 – Proposed Roads Layout Sheet 1

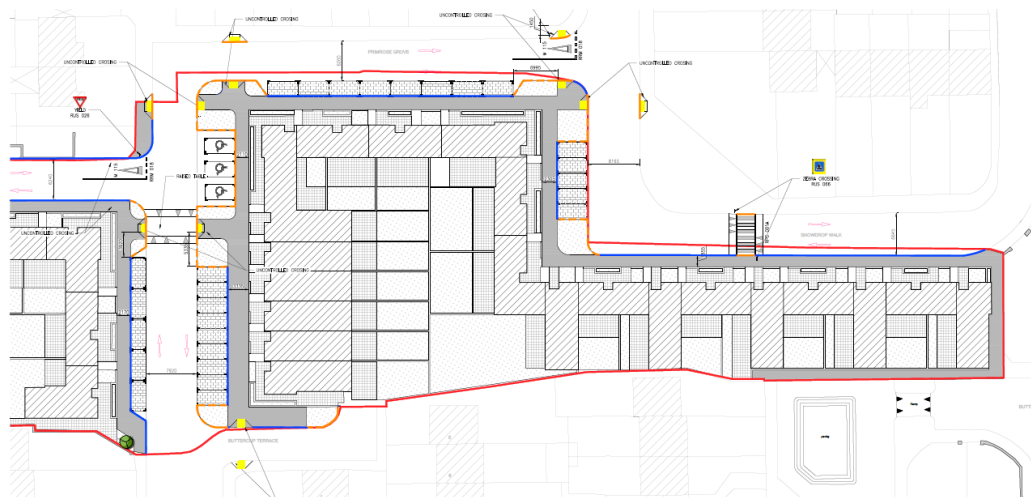


Figure 13 – Proposed Roads Layout Sheet 2

We refer the Planning Authority to the Roads Layout Drawing prepared by Hayes Higgins Partnership for details.

Street Interface

All apartments and houses provided as part of the subject development feature own door access at ground floor level. This will create an active streetscape throughout the development site. A community hub space is provided at the ground floor level of the apartment blocks, addressing Primrose Grove, which will also contribute towards the activation of the streetscape as patrons of this facility access and egress the building.

The proposed development provides passive surveillance from balconies/ terraces and windows along the facades of the proposed development facing north, south east and west, as well as overlooking the communal amenity open spaces proposed for residents of the apartment units. This design is intentional and promotes the feeling of safety, security and privacy for residents of the proposed development across the development site and within the communal spaces proposed.

Engineering Services

An Engineering Services Report for the proposed development has been prepared by Hayes Higgins Partnership to detail the proposed design for surface water drainage, water supply and other associated civil engineering works for the scheme.

Surface water attenuation for the development is provided by permeable paving, grassed areas and landscaped SuDS features such as rain gardens and SuDS tree pits with perforated pipes installed beneath where required to store and slowly release flows. The apartment block internal courtyard will incorporate green roofs, permeable paving and rain gardens to provide on-site attenuation, while other catchments—including footpaths, roofs and hardstanding areas—similarly use ground-level SuDS features before connecting to the existing drainage network. Along the western boundary, cut-kerb inlets allow grassed strips to function as rain gardens. The surface water drainage system provided for the development will be separate from the foul drainage system proposed and will drain to the existing drainage network.



The proposed wastewater drainage system for the development will connect and discharge to the existing public sewer via an existing manhole located to the southeast of the site. The development will be served by a dedicated wastewater drainage system operating on a gravity-fed basis.

Potable water will be supplied to the site via a new 100mm HDPE watermain. A Confirmation of Feasibility Letter has been issued by Uisce Éireann for the proposed development, confirming that the proposal is feasible without requiring infrastructural upgrades.

We refer the Planning Authority to the Engineering Services Report prepared by Hayes Higgins Partnership as part of this Part 8 Proposal for details.

Flood Risk Assessment

A Site Specific Flood Risk Assessment for the proposed development has been completed by IE Consulting. This assessment confirms that the proposed development site is within Flood Zone C and is therefore not considered to be subject to requiring a Justification Test. Some limited areas of the site fall within the extreme 1% AEP (1 in 100 year) pluvial flood zone, with potential pluvial flood depths in the range of 0.1m-0.2m. These potential pluvial flood depths are not considered to be significant and are not considered to present a significant pluvial flood zone to the development as proposed. The potential flood risk to, and arising from, the proposed development is therefore considered to be low.

We refer the Planning Authority to the Site Specific Flood Risk Assessment Report prepared by IE Consulting submitted as part of this Part 8 proposal for details.

Mobility Management Plan

A Mobility Management Plan for the subject development has been prepared by RoadPlan Consulting. The primary objective of this plan is to broaden access to sustainable transport options, thereby reducing reliance on the private car as the default means of travel. The MMP acknowledges that motor vehicle use will remain necessary for certain journeys and may, in some circumstances, be the most practical option. Nevertheless, where viable alternatives are available, these should be actively encouraged as the preferred and most responsible choice. The plan addresses all trips made by residents, encompassing travel between home and a range of destinations including work, education, leisure, and other activities. The MMP is intended to function as a live document, subject to ongoing review and adaptation. A suite of measures and initiatives will be identified, tested, and evaluated on a continuous basis. As the plan evolves, those measures that prove effective will be maintained, while those that fail to gain traction will be removed. The long-term success of the plan depends on sustained engagement from residents, regular performance monitoring, and a responsive approach to management. Ongoing feedback will be essential in ensuring the plan remains relevant, effective, and widely supported.

Road Safety Audit

A Road Safety Audit for the subject development has been prepared by RoadPlan Consulting. This Audit provided an independent review of the proposed road design and recommended changes to ensure that the proposal represented the safest pedestrian and vehicular carriageway arrangements. All recommendations of the Road Safety Audit have been accepted by Hayes Higgins Partnership. Please refer to the completed Road Safety Audit Report for details.





Traffic & Transport Assessment

A Traffic and Transport Assessment for the subject development has been prepared by RoadPlan Consulting. This document examines the potential for traffic implications arising from the proposed development and determines how successfully the proposal can integrate with existing traffic in the area.

Traffic counts were undertaken by RoadPlan on the 12th of December 2025 at the existing Priorswood Rd / The Link Road signalised junction, the existing Priorswood Rd / Buttercup Park priority junction and the existing Priorswood Rd / R107 / Blunden Dr roundabout junction to determine the existing background traffic flow on the existing road network surrounding the proposed development. A capacity assessment was also undertaken at these locations to determine the impact that the proposed residential development will have on the existing road network.

It was concluded that at present, the existing Priorswood Rd / R107 / Blunden Dr Roundabout Junction is operating within capacity with small queues and delays during the AM and PM peak period and at present the existing Priorswood Rd / Buttercup Park Priority Junction is operating within capacity with minimal queues and delays during the AM and PM peak period. With the proposed development in place, in 2028, 2033 and 2043 it is considered that the Priorswood Rd / R107 / Blunden Dr Roundabout Junction will operate within capacity with small queues and delays at the AM and PM peak periods. With the proposed development in place, the Priorswood Rd / Buttercup Park Priority Junction will also operate at capacity with small queues and delays during the AM and PM periods.

We refer the Planning Authority to the completed Traffic & Transport Assessment for details.

Appropriate Assessment Screening

An Appropriate Assessment Screening Report has been prepared for the subject Part 8 proposal by JBA Consulting to determine whether the proposed development is directly connected with or necessary for the management of any European designated site for nature conservation, and if it is likely that the proposed development could give rise to significant effects to European designated sites, either individually or in combination with other plans or projects.

The Appropriate Assessment Screening Report conducted by JBA Consulting concluded that the possibility of any significant effects on Natura 2000 sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt to the best scientific knowledge available. Therefore a Stage 2 Natura Impact Assessment Report and appropriate mitigation is not considered necessary should this project proceed.

We refer the Planning Authority to the completed Appropriate Assessment Screening Report for details.

Ecological Impact Assessment Report

An Ecological Impact Assessment Report has been prepared for the subject Part 8 proposal by JBA Consulting to identify potentially ecologically important features within the zone of influence of the proposed development, determine the ecological value of any identified ecological features and assess the significance of the proposed development on any ecological features of value.

The Ecological Impact Assessment Report concludes that any habitats and faunal groups that the proposed development has the potential to impact on are considered to be of low local ecological





importance. It is considered that once the proposed development is carried out in accordance with the mitigation measures detailed in the Ecological Impact Assessment Report that there will be no significant impacts either alone or in combination with other plans or projects as a result of the proposed development to ecology and local species in the area, or to any designated conservation sites.

The proposed development is anticipated to have a long-term negative residual impact that is not significant for the habitats and faunal groups present within the site and its locality.

We refer the Planning Authority to the completed Ecological Impact Assessment Report for details.

Construction Environmental Management Plan

A Construction Environmental Management Plan for the subject Part 8 proposal has been prepared by AWN Consulting to detail construction techniques and methodologies that will be implemented during the construction of the proposed development to ensure the creation and maintenance of a safe construction site throughout the construction period.

The CEMP will be implemented and adhered to by the Main Contractor and will be overseen and updated as required if site conditions change by the Project Manager, Environmental Manager, Environmental Clerk of Works and Ecological Clerk of Works where relevant. All personnel working on the site will be trained in the implementation of the procedures. This document is considered 'live' and will be updated by the project main contractor once appointed to include any subsequent planning conditions or variations relating to how the development site will be managed by the main contractor during construction.

We refer the Planning Authority to the completed Construction Environmental Management Plan for details.

Operational Waste Management Plan

An Operational Waste Management Plan for the subject Part 8 proposal has been prepared by AWN Consulting to ensure that the waste management during the operational phase of the development is undertaken in accordance with the requirements of all currently applicable legal and industry standards, and to provide a robust strategy for the storage, handling, collection and transport of waste generated at the site.

The Operational Management Plan concludes that, subject to the implementation of the measures recommended within the document, a high level of recycling, reuse and recovery will be undertaken at the development once operational. Adherence to the OWMP will ensure that the waste management for the development is carried out in accordance with the requirement of DCC Waste Bye Laws. It is considered that the proposed development presents sufficient storage for the volume of waste that will be generated once the development is operational.

We refer the Planning Authority to the completed Operational Waste Management Plan for details.

Climate Action & Energy Statement

A Climate Action, Sustainability & Part L Compliance Report has been prepared for the subject Part 8 Proposal by Semple McKillop Consulting Engineers. This report proposes options of methodologies in Energy Efficiency, Conservation and Renewable Technologies that could be provided as part of the proposed development to achieve compliance with the Building Regulations Part L (NZEB) and any





relevant local Strategic Environmental Plans. The following measures are proposed by Semple McKillop for heating, lighting, and potential energy renewal:

- U-Values as stated in section 2.1 and Air tightness as detailed within the Climate Action, Sustainability & Part L Compliance Report.
- Housing Units to have individual air sourced heat pump for heating and hot water.
- Apartment units to have individual exhaust air sourced heat pump for heating and hot water.
- Demand control ventilation.
- LED lighting throughout.
- All public spaces to have ducting for future EV charging point in accordance with Part L.
- Potential Solar PV panels for on-site generation for some units.

We refer the Planning Authority to the completed Climate Action, Sustainability & Part L Compliance Report for details.

Site Lighting

A Site Lighting Report has been prepared for the subject Part 8 proposal by Lighting Reality. The proposal includes for existing lighting within the vicinity of the site to be retired and for new public lighting to be provided across the development site. The scheme has been designed to provide lighting at an 11.25 lux average and 1.5 lux minimum and 7.50 lux average and 1.0 lux minimum across all Roads and Footpaths. All car parking will be provided with lighting at a 5 lux average with 25% uniformity. A maintenance factor of 0.81 is proposed. We refer the Planning Authority to the completed Site Lighting Layout Drawing and Site Lighting Report for details.

Sunlight/ Daylight/ Shadow

A Daylight and Sunlight Assessment has been prepared as part of the subject Part 8 proposal by Digital Dimensions to test Daylight to Neighbouring Buildings, Sunlight to Neighbouring Buildings and Sunlight to Amenity Spaces associated with Neighbouring Properties with the proposed development in place. In addition to this a Daylight and Sunlight assessment has been undertaken to assess the performance of the proposed units provided as part of the subject Part 8 proposal. A Shadow Study has also been undertaken for the proposed development.

All windows tested for daylight in the existing surrounding dwellings produced negligible results with the proposed development in place and meet the standards of BR209:2022.

All windows tested for sunlight exceed the target values set out for annual probable sunlight hours. There is a marginal impact on the winter sunlight in one window tested, at 4.6%, it is marginally below the target of 5%. Any potential loss of sunlight will be minor to negligible, the proposed development meets the recommendations of the BRE guidelines BR209:2022.

The shadow study conducted for neighbouring dwellings amenity spaces identified no potential for additional shadow to be cast from the proposed development compared to the existing situation.

100% of all proposed Living, Dining, Kitchen and Bedroom spaces tested achieve the target values set out in BS EN 17037:2018+A1:2021 section NA1. These are the minimum required values.

The proposed residential units are considered well designed for receipt of sunlight. All proposed houses achieve the minimum target sunlight hours for habitable rooms. 90% of apartment units tested meet



the minimum target sunlight hours for habitable rooms. This is in line with the BRE guidelines example for apartment layouts, where 4 out of 5 units achieve target sunlight hours.

The proposed communal amenity space for the apartment units achieves over 2 hours sunlight on the 21st of March over in excess of 50% of the area proposed and therefore meets the requirement for sunlight included within the BRE guidelines BR209:2022.

We refer the Planning Authority to the completed Daylight and Sunlight Assessment for details.

Verified View Photomontages

Visual Impact Photomontages and a CGI image have been prepared in respect of the development by Digital Dimensions. The photomontages submitted accurately show that the proposed building will appropriately assimilate into its surroundings and not cause any overbearing or over massing impact to surrounding existing buildings, particularly the residential dwellings surrounding the site to the north, east and south at Primrose Grove, Snowdrop Walk, Marigold Walk, Marigold Crescent and Buttercup Avenue.

For the benefit of the Planning Authority a selection of these views is shown below:



Figure 14 – Verified View 02 – From Marigold Park facing North West



Figure 15 – Verified View 03 – From Primrose Grove facing West



Figure 16 – Verified View 05 – From Snowdrop Walk facing South West

It is submitted that the proposed development addresses this back land infill site and successfully assimilates into its surroundings. We refer the Planning Authority to the Visual Impact Photomontage document prepared by Digital Dimensions for a full suite of photomontage images.

Construction Management Plan

A Construction Management Plan has been prepared by Hayes Higgins Partnership in respect of the subject application and is submitted now submitted to the Planning Authority to outline the objectives of managed procedures required to ensure that construction related activities on the site are executed in a safe and controlled manner to prevent any adverse impacts on the surrounding existing environment.

The submitted plan considers all aspects of the project including construction programme and phasing, enabling works, infrastructure works, a description of works, site logistics, indicative construction methods and safety, health and environmental provision.

All appropriate mitigation and preventative measures that will be taken to mitigate any impact on the surrounding environment are outlined in the CMP submitted.

Construction Waste Management Plan

A Construction Demolition Waste Management Plan has been prepared by Hayes Higgins Partnership in respect of the subject application and is submitted now submitted to the Planning Authority. The Plan outlines the responsibilities of relevant persons on the site regarding waste management, with a nominated Construction Waste Manager to be appointed by the Project manager to oversee all aspects of waste management throughout the project, including waste characterisation, implementation of the Construction Waste Management Plan and effective communication of the plan objectives with all site operatives.

It is noted that the developer will be responsible for all waste arising from the project from the time the waste is generated until the time of its treatment/ disposal. The applicant is committed to ensuring that all contractors managing waste on their behalf are legally and technically compliant and that the waste is handled, treated and disposed of in accordance with all relevant regulatory requirements.

Refuse Storage

The Design Standards for Apartments – Guidelines for Planning Authorities (July 2025) set out several design parameters in relation to bin storage in Section 4.2. Provision shall be made for the storage and collection of waste materials in apartment schemes. Waste storage facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and ensure adequate containers can be provided for residual, recyclable and food waste, to comply with waste management legislation, at designated waste storage points. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage and in-sink macerators are discouraged as they place a burden on drainage systems.

It is submitted that an adequate bin storage area is provided in 2 no. secure enclosed areas at ground floor level within the proposed apartment blocks, which will be easily accessible for residents of both blocks and refuse collectors. All houses proposed will be provided with a secure bin store area within their front garden areas.

Acoustic Assessment

An Inward Noise Assessment and External Amenity Space Noise Assessment have been undertaken in respect of the proposed development by Wave Dynamics, as the proposal site is within the Dublin Airport Noise Zone boundary, as detailed on Map Set B within the Dublin City Development Plan 2022-2028. The Acoustic Assessments undertaken in respect of the proposal conclude that



Based on a ProPG Stage 1 and Stage 2 assessment, the site is categorised as low risk. Predicted internal noise levels and external amenity noise levels meet BS 8233 and ProPG targets, provided the specified building envelope and ventilation strategy are implemented. Consideration has been given to the future growth of roads.

Based on the measured noise levels at the site it is predicted that the internal and external noise levels will achieve the targeted noise levels in line with BS 8233 and ProPG guidance.

General and site-specific mitigation measures have been provided in this report to bring the construction noise levels down within the limits of BS 5228. Following the noise mitigation recommendations in this report, the construction phase is expected to meet the requirements of BS 5228. Please refer to the Acoustic Design Statement prepared by Wave Dynamics for details.

Archaeological Impact Assessment

An Archaeological Impact Assessment for the proposed development site has been completed by Archaeology and Built Heritage to assess the potential impact to any archaeological resources present on the subject site. This assessment concludes that no issues have been identified for an archaeological perspective that would preclude development being undertaken on the subject site. Please refer to the Archaeological Impact Assessment Report prepared by Archaeology and Built Heritage for details.



6 Strategic Planning Policy Context

This section has been prepared to demonstrate the proposed development compliance with, and contribution towards the achievement of, high level national and regional strategic planning policies and objectives. It is considered that the following documents are relevant to the subject development:

- Delivering Homes, Building Communities 2025-2030
- National Planning Framework: Project Ireland 2040
- Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019 – 2031
- Transport Strategy for the Greater Dublin Area 2022 – 2042
- Greater Dublin Area Cycle Network Plan
- Design Manual for Urban Roads and Streets
- Climate Action Plan 2025

6.1 Delivering Homes, Building Communities 2025-2030



The Government has introduced a new housing plan called “Delivering Homes, Building Communities”, which aims to speed up the delivery of new homes and tackle homelessness. The plan targets the construction of 300,000 homes, including 90,000 social homes. Building on the progress of Housing for All, which has already delivered 137,000 homes since 2021, and informed by the Housing Commission’s work, this plan will see the State take a bigger role while also encouraging the private sector to play a key part in delivery. To accelerate progress, the plan includes regulatory reforms, tax incentives, and the largest ever investment in infrastructure in the history of the State - €275 billion over ten years through the National Development Plan.

This document includes a number of core principles for housing policy for 2025-2030 and includes that in implementing Delivering Homes Building Communities, Government:

- Affirms that housing is the number one priority for all arms of Government, including local government.
- Recognises the need to ensure access for everybody to good quality, affordable and secure housing within vibrant communities, suitable to individual needs as they move through their life.
- Affirms that homelessness is unacceptable and accepts that the solution lies in supplying more homes and supports to tackle its root causes.
- Recognises that promoting homeownership is a key objective and pledges to provide targeted homeownership supports.
- Commits to building unprecedented levels of social homes and prioritising those who need the most help.
- Believes that homes should not be allowed to lie empty and derelict while housing need is so critical.

- Commits to the highest ever investment of the State’s resources towards both building more homes and building more infrastructure to support the development of those homes.
- Will work with Local Authorities, the Land Development Agency, Approved Housing Bodies and the private sector to drive delivery.
- Understands that a stable domestic policy environment is crucial to attract the inward investment needed to achieve our supply goals.
- Expects that all people and organisations, whether public or private, will play their part in tackling the housing crisis.

Delivering Homes, Building Communities is informed by the Governments Housing Policy Core principles and encompasses 2 pillars, detailed as follows:

- **Pillar 1 – Activating Supply:** Pillar 1 focuses on activating the supply of 300,000 homes. It reflects an all-of-Government approach to achieve this ambitious goal. Government has developed a suite of actions to activate land, provide housing-related infrastructure, secure investment, address viability, increase skills in the residential construction sector and work towards ending dereliction and vacancy.
- **Pillar 2 – Supporting People:** Pillar 2 details how Government will support people. It sets out a series of key actions that work towards ending homelessness, support affordability and address the housing needs of people as they progress through life. In partnership with local authorities, the Land Development Agency and Approved Housing Bodies, the Plan will address the needs of the most vulnerable in our communities, make buying and renting homes more affordable and support the development of villages, towns and cities across the country.

The Plan includes the following text relating to Driving Delivery with Key Partners:

‘Reaching our housing projections will only be achieved through the individual and collective effort of the key delivery partners. In this respect, local authorities, together with Approved Housing Bodies (AHBs), the Land Development Agency (LDA) and the construction sector, will be critical to delivering and enabling the delivery of the quantum of homes needed over the lifetime of the plan.’

It also includes the following text relating to the role of Approved Housing Bodies in achieving the objectives of the Plan:

‘Government commitment to strengthening AHB capacity, delivery and specialism to increase delivery is a critical success factor. To this end, the sector will be supported to organise so it can deliver at scale.

This includes, among other things, supporting a restructuring and consolidation of the sector, addressing legacy impediments, debt and cost/ income constraints that might impede delivery, and providing greater clarity through Housing Delivery Action Plans of the required social and affordable delivery by AHBs to meet identified requirement.

These measures will underpin confidence within the sector to invest in the organisational changes, and capacity and capability development required to secure a resilient and sustainable sector capable of delivering and operating at scale’.

It is considered that the proposal for 84 no. new social homes to be delivered by Dublin City Council in partnership with Respond Housing Association and contributes towards the delivery of housing and supporting people as outlined in Pillar 1 and Pillar 2 of the Delivering Homes, Building



Communities document and realises the objectives of the Plan for housing to be delivered by Local Authorities and Approved Housing Bodies.

6.2 National Planning Framework – Project Ireland 2040

Project Ireland 2040

National Planning Framework First Revision

April 2025

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The NPF was originally published in 2018, and replaced the National Spatial Strategy as the overall spatial planning and development strategy for Ireland. Planning legislation provides for the Government to revise or replace the NPF every six years. Following a decision of Government in June 2023, the preparation of a revised National Planning Framework commenced, with a draft revision being displayed in July 2024. Based on feedback from the consultation, an updated version of the draft revised NPF was then published in November 2024.

Following such, on the 8th of April 2025, the Government approved the Revised National Planning Framework which, subject to the approval of both Houses of the Oireachtas, signals the conclusion of the NPF revision process, which has been underway since June 2023 and is detailed below.

The NPF has been updated to address evolving challenges and needs, including population growth, housing demands, infrastructure requirements, and climate change for example.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building stronger regions – accessible centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated compact, smart and sustainable growth.

The key high - level objectives of the Plan are:

- To continue a path of economic prosperity, environmental sustainability, and climate action across all regions to compete international and be drivers of national and regional growth.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodate and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

Overall, the Framework caters for:

- The extra one million people that will be living in Ireland by 2040.



- The need for approximately 50,000 additional households per annum to 2040.
- The demand for additional school places, special education provision, and third-level education places.

The NPF sets out that the Eastern and Midlands region will, by 2040, be a Region of around 3 million people, at least half a million more than today. It is identified that the region's most significant place-making challenge will be to plan and deliver future development in a way that enhances and reinforces its urban and rural structure and moves more towards self-sustaining, rather than commuter driven activity, therefore allowing its various city, metropolitan, town, village and rural components to play to their strengths, while above all, moving away from a sprawl-led development model.

The sites zoning allows for mixed use residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable form of development.

It is submitted that the current proposal for 84 no. new residential units and a community hub that will deliver on the above objectives of the NPF. We note specifically that the addition of 1, 2, 3 and 4 bed units provided as part of the subject scheme, as houses and apartments, that will cater for a wide demographic of future residents at Darndale.

The following policies are considered key in the context of this site:

National Policy Objective 3 –

Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.

National Policy Objective 7 –

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

National Policy Objective 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.

National Policy Objective 14 –

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.

National Policy Objective 20 –

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 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.

National Policy Objective 37 –

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages

National Policy Objective 42 –

To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.

National Policy Objective 43 –

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

National Policy Objective 44 –

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

National Policy Objective 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.

We submit that the proposal for residential development at this highly accessible location is consistent with the objectives of the National Planning Framework for 2040.

6.3 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019 – 2031



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.

- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The subject site is located within the Eastern and Midland Region and therefore is subject to the Regional Spatial and Economic Strategy (RSES) for this region. Following consideration of the Director's Report on the Proposed Material Amendments, the Eastern and Midland Regional Assembly decided to make the final RSES on the 28th of June 2019. The RSES provides a long-term strategic planning and economic framework for the development of the region and replaces the Regional Planning Guidelines.

The following Housing and Regeneration and Consolidation and Re-Intensification policies and objectives as included within the RSES are considered relevant to the subject development:

- **RPO 3.2** – *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.*
- **RPO 3.3** - *Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for new Apartments Guidelines' and the 'Urban Development and Building Heights Guidelines for Planning Authorities'.*
- **RPO 4.3** - *Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.*
- **RPO 5.4** - *Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities.'*
- **RPO 5.5** - *Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns."*

We submit that the site is ideally located in Dublin City Centre close to retail and services, open spaces, and public transport, and delivers on the objectives outlined in the RSES relating to the consolidation of Dublin City and its suburbs, offering a high-quality medium density housing and apartment development on an appropriately zoned greenfield infill site at Darndale.

The proposal also delivers on the objectives outlined in the RSES surrounding the provision of flexible housing typologies, with the development delivering a variety of housing types and sizes, which can cater for a wide demographic. The deliverance of a mix of housing types and sizes is much needed to cater for a growing population within the jurisdiction of Dublin City Council, increasing the flexibility of the overall social housing unit typology within the county.

We submit that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

6.4 Transport Strategy for the Greater Dublin Area 2022 – 2042



The Transport Strategy for the Greater Dublin Area 2022-2042 replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016- 2035, which was approved by the then Minister for Transport, Tourism and Sport in 2016. This document sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare, over the period of the strategy and has been approved by the Minister for Transport in accordance with the relevant legislation.

The Strategy sets out measures to achieve the vision and objectives for the GDA. These include creating a better environment and meeting our environmental obligations by reducing car dependency and increasing more sustainable transport options (walking, cycling, increasing walking & public transport use etc.), enhancing the health and quality of life of our society by improved connectivity and delivering safe and integrated transport options, supporting sustainable economic activity and growth, and delivering a high quality, equitable and accessible transport system for all.

The following forthcoming schemes listed within the Transport Strategy document are considered to benefit the development site, and will further support development on these lands:

- BusConnects Dublin Core Bus Corridors – A number of BusConnects Core Corridors have been granted planning permission and implementation is ongoing.
- BusConnects Dublin new services network – implementation has commenced and is ongoing.

The following expansions to public transport fleets are listed in the Strategy document, which will give rise to improved services through increased frequency and efficiency:

- 219 Double-deck hybrid buses were delivered in 2021 and 2022 and are now deployed on the Dublin region services.
- 34 single deck electric buses and 100 double deck electric buses for deployment on the Dublin region services have commenced delivery in 2023 and are awaiting deployment.

The development site is located approximately 250 metres to the west of the Malahide Road, which is included within the route of the permitted BusConnects Clongriffin – City Centre Core Bus Corridor. It is considered that the subject site will from further increased bus frequencies and decreased journey times when this project is implemented.

We submit that the proposal for residential development at this location is supported by the objectives of the Transport Strategy for the Greater Dublin Area 2022 – 2042.

6.5 Greater Dublin Area Cycle Network Plan (2022)

Greater Dublin Area Cycle Network Plan

Urban Network, Inter-Urban Network and Green Route Network

The Greater Dublin Area Cycle Network Plan was adopted in January 2023 as part of the Greater Dublin Area Transport Strategy 2022 – 2042 and identifies and determines in a consistent, clear and logical manner, the following cycle networks within the GDA:

- The Urban Cycle Network at the Primary, Secondary and Feeder level;
- The Inter-Urban Cycle Network, linking the relevant sections of the Urban Network and including the elements of the National Cycle Network within the GDA. The Inter-Urban Network also includes linkages to key transport locations outside of urban areas such as airports and ports; and
- The Green Route Network that are cycle routes developed predominately for tourist, recreational and leisure purposes.

The Cycle Network Plan is consistent across county boundaries in the GDA, such that there is continuity of route networks across these administrative boundaries. The subject site is included on the GDA Cycle Network Plan for the Dublin North Central Area as follows:

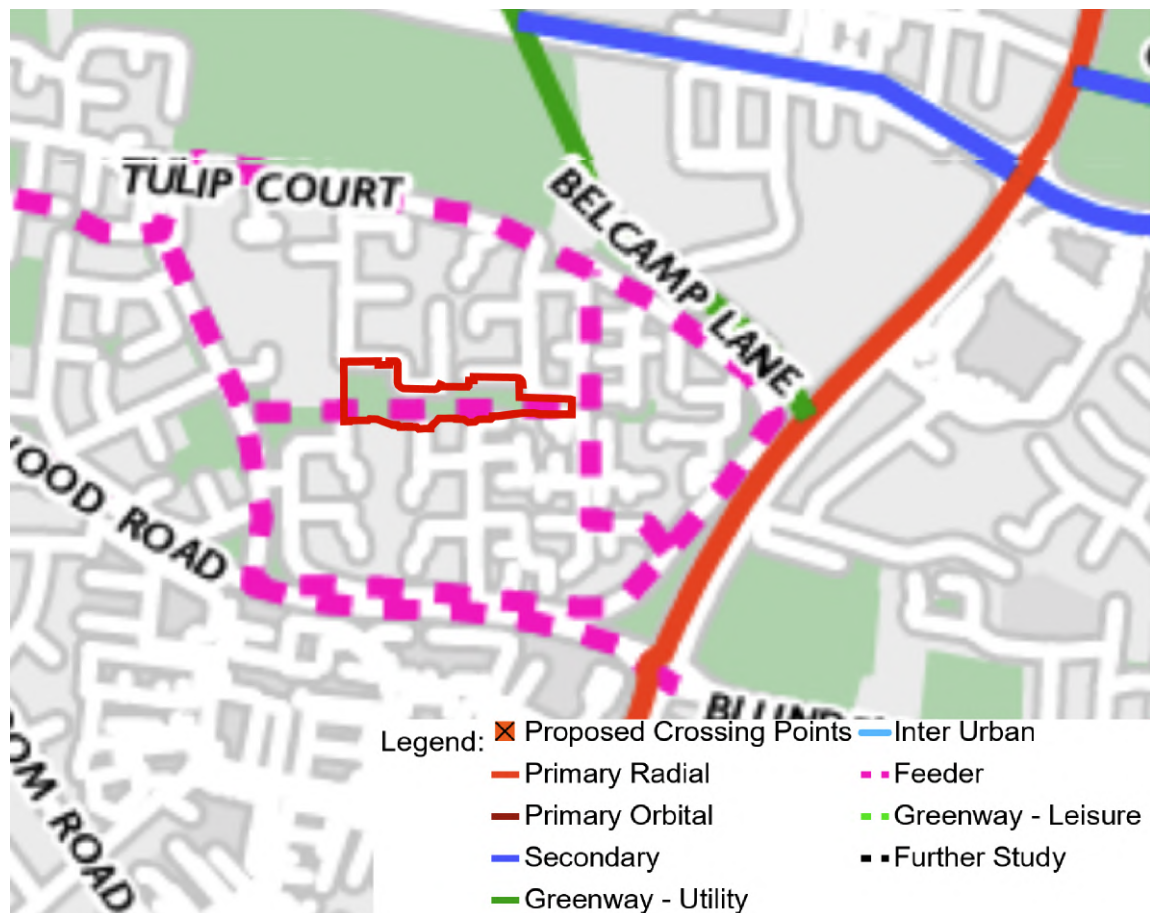


Figure 17: GDA Cycle Network Plan for the Dublin North Central Area

The Cycle Network Plan provides for feeder routes through Darndale, including along the southern boundary of the development site, providing a connection to an envisaged Greenway along Belcamp Lane, which further connects to a Secondary Cycle Route along the R139 to the north.

It is considered that these envisaged upgrades to the cycle network will further increase the connectivity of the site once implemented.

6.6 Design Manual for Urban Roads and Streets



The Design Manual for Urban Roads and Streets (DMURS), 2019, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. DMURS places a focus on pedestrians, cyclists and public transport users and sets out guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. Consideration of DMURS and its contents has been a key objective for this project. The four key design principles have been incorporated as follows:

- Connected networks: To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and more sustainable forms of transport.
- Multi-functions streets: The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.
- Pedestrian focus: The quality of the street is measured by the quality of the pedestrian environment.
- Multidisciplinary approach: Greater communication and co-operation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.

The subject development provides for upgrades to the public realm across the subject site, including for the provision of new through roads and pedestrian footpaths across the subject site, connecting Marigold Crescent, Marigold Park and Buttercup terrace to the south of the site to Primrose Grove, and Snowdrop Walk to the north of the site. The proposed roads layout through the site has been designed by Hayes Higgins Partnership in consultation with the Dublin City Council Transportation Planning Division. The proposed road design has been subject to an external Road Safety Audit by Traffico, and all recommendations brought forward in this report have been incorporated into the final proposal by the road designer. It is submitted that the proposal promotes the principles of DMURS.

6.7 Climate Action Plan 2025

Climate Action Plan 2025

Climate Action Plan 2025 (CAP25) is the third statutory annual update to Ireland's Climate Action Plan under the Climate Action and Low Carbon Development (Amendment) Act 2021.

The Plan lays out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

Climate Action Plan 2025 builds upon last year's Plan by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings and it should be read in conjunction with Climate Action Plan 2024. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

The Climate Action Plan outlines the strategies necessary to progress towards a 51% reduction in greenhouse gas (GHG) emissions by 2030 and reaching climate neutrality by no later than 2050. The Climate Action and Low Carbon Development (Amendment) Act 2021 requires the Minister for the Environment, Climate and Communications to prepare annual updates to the Climate Action Plan.

The Climate Action Plan notes that the planning system plays an integral role in meeting the National Climate Objective and having a vertically integrated policy framework that supports the actions in the Climate Action Plan is critical.

The Plan outlines that local authorities have an integral and critical role in decarbonising transport, through the spatial and land-use planning system, promoting public transport-oriented development, ensuring permeability for active modes, implementing and requiring sustainable parking policies, delivering public realm improvements, developing appropriate demand management measures, and provision of EV charging and alternative fuels infrastructure.

The design team has had full regard to the provisions and objectives set out in the Climate Action Plan 2025. The proposed development has been designed in alignment with the Plan's overarching goals of decarbonisation and climate resilience. Sustainable design principles have been incorporated throughout, including the use of low-impact and energy-efficient materials and integration of green infrastructure. The development includes reduced provision of car parking spaces and inclusion of cycle parking provision above minimum required levels.

7 Section 28 Ministerial Guidelines

Section 28 of the Planning & Development Act provides that Planning Authorities and An Coimisiún Pleanála shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended), in the performance of their functions. The proposed development has been assessed against the requirements of the following documents:

- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities.
- NPF Implementation: Housing Growth Requirements 2025
- Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025
- Urban Development and Building Height Guidelines (2018)
- The Planning System and Flood Risk Management (2009)
- Guidance on Appropriate Assessment for Planning Authorities (2009)
- Guidelines for Planning Authorities on Childcare Facilities (2001)

7.1 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities



The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)* set out policy and guidance in relation to the planning and development of urban and rural settlements with a focus on residential development and the creation of compact sustainable settlements.

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and provide updated guidance to take account of current policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

Given the NPF priorities for compact growth and reflecting the variety of settlements and settlement contexts where residential development takes place. The Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines to ensure that densities are efficient while, at the same time, tailored to the settlement context.

Section 3.3 identifies settlements, area types and density ranges for cities and metropolitan (MASP) areas. It's noted that the strategy for all cities is to support consolidation and intensification within and close to the existing built-up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport.

Policy and Objectives 3.1 (Building Density Guidelines)

“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.”

Policy Objective 3.1. of the Guidelines adopts a 2-step approach to density, that being Step 1 - the application of an appropriate range followed by Step 2 - a requirement to refine the density in terms of the site’s accessibility and considerations in relation to local character amenity and the natural environment.

Step 1

Section 3.3.1 of the Guidelines reviews what are termed ‘settlements, area types and density ranges’ for various site locations. In terms of categorisation, Table 3.1 of the Guidelines outlines density ranges for Dublin and Cork City and Suburbs. The ranges are broken down into ‘City – Centre’, City – Urban Neighbourhoods’ and City – Suburban/ Urban Extension.

In terms of categorisation, the subject site can be defined as a ‘**City – Urban Neighbourhoods**’ site which is defined in the guidelines as follows:

*The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) **lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8)** – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. **It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.***

Step 2

Section 3.4 of the Guidelines relates to refining density which must consider **site accessibility** and considerations in relation to **local character, amenity and the natural environment**.

Consideration of Proximity and Accessibility to Services

Table 3.8 defines lands around existing or planned high capacity public transport nodes or interchanges as follows:

- *Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations **within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop.***
- *Highest densities should be applied at the node or interchange and decrease with distance.*
- *‘Planned public transport’ in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has publish*



The development site is located approximately 250 metres to the west of the Malahide Road, which is included within the route of the permitted BusConnects Clongriffin – City Centre Core Bus Corridor and therefore is considered to be located at a high capacity public transport nodes or interchange for the purposes of density calculation.

Densities of 50- 250 dph should generally be applied at the subject site. The guidelines note that highest densities should be applied at high capacity public transport nodes or interchanges, and decrease with distance. It is noted that the density on the subject site has been driven by the surrounding existing residential context and the requirement to provide a development which appropriately assimilates and responds to its surrounds, protecting levels of existing amenity.

Considerations of Local Character and Amenity

The Sustainable Residential Development and Compact Settlement Guidelines note that new developments should respond to the receiving environment in a positive way and should not result in a significant negative impact on the character, including historic character, amenity or the natural environment.

It is noted that the density on the subject site has been driven by the surrounding existing residential context and the requirement to provide a development which appropriately assimilates and responds to its surrounds, protecting levels of existing amenity.

Further, we note that Appendix B of the Sustainable Residential Development and Compact Settlements Guidelines state that when calculating residential densities within mixed use schemes, planning authorities shall exclude the % of non-residential uses in proportion to the net site area, i.e.:

- Calculate Net Site Area
- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwellings by reduced site area.

This calculation has been completed for the subject development as follows:

SRSCG Appendix B Density Calculations	Proposed
Calculate net site area	1.4885 ha
Calculate overall GFA	9513 sqm
Non-residential GFA	86 sq.m (Community Hub)
Residential GFA	9427 sq.m
Residential as a portion of Development	$9427 / 9513 \text{ sqm} = 99\%$
Site Area for Density Purposes	$1.4887 \text{ ha} * 99\% = 1.4736 \text{ ha}$
No. Units	84
Gross Density	approx. 56 dph
Net Density	approx. 57 dph

Table 1 – Density Calculation as per Appendix B SRSCG



The density is based on the provision of 84 no. units on a net site area of 1.4736 ha which provides a density of approx. 57 units per hectare (Net) and is considered appropriate given applicable density range of 50-250 units per hectare as included within the Guidelines, the development design which has been refined to appropriately assimilate with, and respond to, its immediately surrounding context, and the proximity of the site to planned public transport links.

The Guidelines also include several Specific Planning Policy Requirements (SPPRs) that should be considered in the context of the future development of the site. SPPRs 1, 3, 4, and 5 are considered relevant for the current site. SPPR 2 relates to minimum private open spaces for houses (the subject development consists of apartments only). The relevant SPPRs, and a demonstration of the proposal compliance with all key requirements, is now set out below:

SPPR 1 (Separation Distances) –

“It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces...”

The proposed development provides separation distances that exceed the minimum requirement of 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. We refer the Planning Authority to the Architectural Drawing Pack prepared by PKA Architects for details.

SPPR 3 (Car Parking) –

“It is a specific planning policy requirement of these Guidelines that:

(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling...

Applicants will be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.”

The proposed development is located within the ‘City – Urban Neighbourhood’ as defined within the Sustainable and Compact Settlements Guidelines. Guidance for Car Parking provision within City - Urban Neighbourhoods lists that parking should be minimised, substantially reduced, or wholly eliminated. At these locations, a maximum of 1 no. car parking space per dwelling can be provided. It is submitted that 79 no. car parking spaces are provided for the 84 no. houses/ apartments proposed, which is below the maximum rate of 1 per dwelling.

It is considered that this level of car parking is justified at this location given the typology of units proposed, which include a number of family sized dwellings (5 no. 2 bed apartments, 12 no. 2 bed houses, 21 no. 3 bed houses and 1 no. 4 bed house).

SPPR 4 (Cycle Parking and Storage) –

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

- (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.***
- (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”***

It is submitted that the proposed development provides cycle parking meeting the standards as outlined in the Dublin City Development Plan 2022-2028. The development provides 95 no. cycle parking spaces for the proposed apartment element of the development and 7 no. visitor cycle parking spaces for the houses proposed. It is considered that all houses provided can store bicycles within the ground level private rear gardens provided.

The proposed development is entirely consistent with the overall principles and provisions of the Sustainable Residential Developments and Compact Settlement Guidelines (2024).

7.2 NPF Implementation: Housing Growth Requirements

NPF Implementation: Housing Growth Requirements

Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended)

The Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, published in December 2020 have now been replaced by the Section 28 Guidelines on National Planning Framework Implementation – Housing Growth Requirements.

Further to approval of the Revised NPF in April 2025, which sets out a need to plan for the delivery of approximately 50,000 additional housing units per annum to 2040, it is now necessary to replace the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities



published in 2020, and to provide updated ‘housing growth requirements’ to local authorities in order to facilitate the review and variation of city and county development plans.

The Guidelines set out the housing demand scenario to 2040 for each local authority, based on ESRI modelling of population growth and structural housing demand and assumptions relating to unmet demand. Local Authorities can now begin the process of assessing their existing development plans in order to reflect the revised figures in their development plans.

The following Policies & Objectives included within this document are considered to be of direct relevance to the subject proposal:

- **Policy & Objective 1** – It is a policy and objective of these Guidelines that the housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.
- **Policy & Objective 2** – It is a policy and objective of these Guidelines that ‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

Appendix 1 of these guidelines includes the following Housing Supply Targets and Growth Requirements for Dublin City Council:

Local Authority	Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual New Housing Growth Requirement to 2034	New Annual New Housing Growth Requirement 2035 to 2040
Dublin City Council	4,861	8,196	8,196	6,075

The proposed development contributes towards the achievement of the increased housing supply target requirements to 2040 for Dublin City Council as included within the National Planning Framework Implementation – Housing Growth Requirements, providing 84 no. new residential units on appropriately zoned lands.





7.3 Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025

Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025

The Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025 (the “Apartment Guidelines”) were published on the 8th of July 2025, replacing the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023.

It is expressly noted to the Planning Authority that the apartment units provided meet all standards included within the Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025 and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023.

The Apartment Guidelines are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

The proposal provides 84 no. residential units total, including 50 no. apartment units (45 no. 1 bed and 5 no. 3 bed). This section has been prepared to demonstrate the compliance of the 50 no. apartment units provided as part of the development with the Guidelines as follows:

Specific Planning Policy Requirement 1

- (A) *With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.***
- (B) *Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.***

Applicant Response to SPPR1

The proposed apartment element of the development will be provided as 5 no. 1 bed apartment units and 45 no. 2 bed apartment units. It is submitted that the unit mix proposed has been presented to, and agreed with, the Dublin City Housing Department, who have identified a specific need for this type of housing within the jurisdiction of Dublin City Council.

Specific Planning Policy Requirement 2

Minimum Apartment Floor Areas (Studio apartment (1 person) 32 sq.m; 1-bedroom apartment (2 persons) 45 sq.m; 2-bedroom apartment (3 persons) 63 sq.m; 2-bedroom apartment (4 persons) 73 sq.m; 3-bedroom apartment (4 persons) 63 sq.m) and 3-bedroom apartment (5 persons) 90 sq.m).

Applicant Response to SPPR2



The proposed development will provide 50 no. apartment units within the apartment element of the scheme. All units will meet or exceed the minimum required unit sizes as follows:

- 45 no. 1 bed apartments – Ranging in size from 53 sq.m to 66 sq.m.
- 5 no. 2 bed apartments - Ranging in size from 73 sq.m to 90 sq.m.

It is submitted that all apartment units have been provided to meet and exceed the minimum apartment sizes required within the Guidelines.

Specific Planning Policy Requirement 3

“In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

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

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

Applicant Response to SPPR3

The subject proposal provides 50 no. of the proposed 50 no. apartment units as dual aspect, or 100%. This percentage of units provided with dual aspect meets and exceeds the minimum requirement for 25% dual aspect units within new developments. It is considered that this level of dual aspect provides a high level of amenity for the apartment units proposed, as they will receive natural light from 2 no. sides.

Given this, the proposed development complies with the dual aspect ratio required of the Apartment Guidelines.

Specific Planning Policy Requirements 4

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

Applicant Response to SPPR4

We confirm that the ground floor of the proposed scheme provides floor to ceiling heights in excess of 2.7m.

Specific Planning Policy Requirements 5

“There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.”

Applicant Response to SPPR5

The removal of a limit to the number of apartments allowed per floor within the Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025) is noted by the applicant and design team.

Specific Planning Policy Requirements 6

“The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.”

Applicant Response

It is considered that the requirement for these facilities does not apply to the subject site under the terms of the Dublin City Development Plan 2022-2028. However, the proposed development provides a community hub space at ground floor level within the apartment block provided, which can be used as an amenity space by residents of the proposed development, or booked by local clubs and groups for events and classes.

In addition to the Specific Planning Policy Requirements noted above the ‘Apartment Guidelines’ This sets out additional requirement for the following items:

Internal Storage

Unit Type	Min. Storage Requirements	Proposed Min.
1-bed	3 sqm	3 sq.m
2-bed	6 sqm	6.1 sq.m

Table 2 – Storage Requirement and Provision

We submit that compliance with the minimum required areas for internal storage space is achieved in all units. We refer the Planning Authority to the Architects Pack prepared by PKA Architects now submitted as part of this Part 8 proposal pack for details.

Private Amenity Space

The proposed development complies with the requirements set down in respect of private amenity open space in the guidelines. All of the units are provided with private open space comfortably in accordance with the minimum requirements. We refer the Planning Authority to the Architects Pack prepared by PKA Architects now submitted as part of this Part 8 Proposal Pack for details.

Unit Type	Min. Private Open Space Req.	Proposed Min.
1-bed	5 sqm	6.2 q.m
2- bed	7 sqm	7.8 sq.m

Table 3 – Private Amenity Space Requirement and Provision

We submit that compliance with the minimum required areas for private amenity space is achieved in all units. We submit this is consistent with the design standards and is acceptable in this instance given the overall design quality put forward. All balconies will meet or exceed the minimum depth requirement of 1.5 m.

Communal Amenity Space

Unit Type	Minimum Area per unit	Requirement
1-bed	5 sqm	45 x 5 sq.m = 225 sqm
2 bed	7 sqm	5 x 7 sqm = 35 sqm
Total		260 sq.m

Table 4 – Communal Amenity Space Requirement and Provision

The current proposal exceeds the minimum requirement of 260 sqm and provides for a total of 337 sqm of outdoor communal amenity space. In addition to this a community hub space is provided at ground floor level of Block A, providing 86 sq.m on indoor communal amenity space.

Car Parking

The guidance offered by *Planning Design Standards for Apartments 2025* is to minimise, substantially reduce or wholly eliminate car parking for central and or accessible urban locations.

It is submitted that 79 no. car parking spaces are provided for the 84 no. houses/ apartments proposed. This level is below the maximum permissible car parking rate for the subject site as included within the Dublin City Development Plan 2022-2028 and the Sustainable and Compact Settlements Guidelines for Planning Authorities. It is considered that this level of car parking is justified at this location given the typology of units proposed, which include a number of family sized dwellings (5 no. 2 bed apartments, 12 no. 2 bed houses, 21 no. 3 bed houses and 1 no. 4 bed house).

The proposed development is entirely consistent with the overall principles and provisions of the Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025).

As an aside, we note the Judicial Review proceedings currently in front of the Courts in respect of these Guidelines. We are aware of the issues arising but note that the 2025 Guidelines remain in place until such a time as a ruling is made. We note that, in the event the 2023 Apartment Guidelines become relevant to the determination of the application, the current scheme complies fully with the parameters, guidance and SPPR's contained within same.

7.4 Urban Development and Building Height Guidelines (2018)

Urban Development and Building Heights

Guidelines for Planning Authorities

December 2018



The '**Urban Development and Building Heights, Guidelines for Planning Authorities (2018)**' are intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. The competent authorities are now obliged to consider the content of these guidelines in consideration of the matter of building height.

Section 1.14 of the document sets out the following:

"Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans/schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements."

The following SPPRs are considered particularly relevant to the current site context.

SPPR1

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

SPPR 3 (A)

“It is a specific planning policy requirement that where;

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

We note that Section 3.1 of the Guidelines states that:

*“In relation to the assessment of individual planning applications and appeals, **it is Government policy that building heights must be generally increased in appropriate urban locations.** There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:*

- Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*
- Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?”*

It is noted that the proposed development does not represent a significantly tall building on the site, or represent any development form or type that is not prevalent in the immediately surrounding residential area, which is predominately 2 storey in height.

The proposed 2-3 storey development, providing 2 storey residential houses and 3 storey apartment blocks, has been designed to respond to and assimilate with the surrounding existing residential developments at Primrose Grove & Snowdrop Walk to the North, Buttercup Avenue to the East, Buttercup Avenue, Marigold Avenue & Marigold Park to the South and the Church of Mary Immaculate to the West.

The arrangement of the proposed development across the site, providing 4 no. development blocks, ranging in height from 2- 3 storey, means that the perception of massing on the site is broken up, and will not appear monolithic when viewed from its surrounds.

The subject site is ideally located to maximise residential supply within Dublin City, close to facilities, services, amenities, and transport links. The proposal meets and exceeds all standards included within National, Regional and Local Planning Policy documents, including the Design Standards for Apartments, Guidelines for Planning Authorities (2025) and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

It is therefore considered that this development height of 2-3 storeys is wholly appropriate for the development site and presents a building height in line with the existing development height on the subject site, and respects the surrounding context. The now proposed building height allows for the provision of a new residential development to be provided on a site close to services, amenities and transport links, whilst also protecting the existing residential context surrounding the site, mitigating against any overbearing, overlooking or over massing impacts that may have arisen should taller buildings be proposed at this location.

We submit that the proposal is consistent with the Urban Development and Building Height Guidelines for Planning Authorities (2018).

7.5 The Planning System and Flood Risk Management (2009)



The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended).

The purpose of the Guidelines is that Planning Authorities must implement the Guidelines in ensuring that where relevant, flood risk is a key consideration in the assessment of planning applications.

We refer to the enclosed Flood Risk Assessment Report, prepared by IE Consulting for full details on the assessment carried out in line with the above guidelines. The key conclusions of this document are as follows:

In consideration of findings and recommendation of this Site Specific Flood Risk Assessment, the potential flood risk to and from the development as proposed is considered to be low.

The development as proposed is not expected to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.

The flood risk to and from the development as proposed is considered to be low. The development as proposed is not predicted to result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk



perspective. We refer the Planning Authority to the Site-Specific Flood Risk Assessment prepared in respect of the subject Part 8 proposal for details.

We submit that the proposal is consistent with the Planning System and Flood Risk Management (2009).

7.6 Guidance on Appropriate Assessment for Planning Authorities (2009)

Under Article 6(3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e., SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 - 2010).

An Appropriate Assessment Screening Report has been prepared by JBA Consulting and is lodged to the Planning Authority as part of this application pack.

The proposed development has been assessed considering the following:

- Whether the proposed plan or project is directly connected with or necessary for the management of the European designated site for nature conservation (Natura 2000 site)
- if it is likely to have a significant effect on the European designated site, either individually or in combination with other plans or projects.

The Appropriate Assessment Screening Report concluded that on the basis of the screening exercise carried out, it can be concluded that the possibility of any significant impacts on any Natura 2000 sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available. Therefore, a Stage 2 Natura Impact Statement and appropriate mitigation is not required should this project proceed. If any changes occur in the design of these works, a new Screening for Appropriate Assessment is required.

We refer the Planning Authority to the Appropriate Assessment Screening Report prepared by JBA Consulting as part of this Part 8 Proposal Pack for details.

7.7 Guidelines for Planning Authorities on Childcare Facilities (2001)

Childcare Facilities

Guidelines for Planning Authorities

The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines state: “Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare.





The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities.”

And includes that:

‘Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments. For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate. (See also paragraph 3.3.1 and Appendix 2 below). The threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. Authorities could consider requiring the provision of larger units catering for up to 30/40 children in areas of major residential development on the basis that such a large facility might be able to offer a variety of services – sessional/drop in/after-school, etc.’

A Social Infrastructure Audit has been carried out by Brock McClure Planning & Development Consultants and is now submitted as a separate document as part of this Part 8 Proposal Pack. As part of this document, the requirement for childcare arising from the subject proposal and the capacity of existing surrounding creche facilities was assessed. For the convenience of the Planning Authority, the conclusions made within this Audit in respect of the availability of spaces in surrounding childcare facilities is now detailed below:

It is noted that the 2, 3 and 4 bed units should only be considered as contributing to a requirement for childcare in accordance with the provisions of the Apartment Guidelines of 2025, it is not considered that 1 bed apartment units will give rise to any requirement for childcare to be provided. Therefore 39 no. units have the potential to require childcare. This is the upper most demand in terms of requirements for childcare and it could be argued that this will be significantly less at operational stage given that not all 2, 3 and 4 bed units will require childcare. Notwithstanding this, we note the following calculations based on these uppermost requirements.

- 39 units & 1 facility required for every 75 units = $39/75 = 0.52$
- 20 childcare spaces required for every 75 units = $20 \times 0.52 = 10.4$

10 no. spaces represents the envisaged maximum childcare requirement arising from the development as per the basic calculation method provided in the Childcare Guidelines 2001. It is submitted that by using Census 2022 date, it has been proven that the total demand for childcare arising from the proposal is likely to be c. 8 spaces. To determine the available number of childcare facility places in the area, a desktop-based assessment was carried out to determine the location of services within c. 2 km of the site, equivalent to a c. 20 minute walk. We endeavoured to get an indication for the capacity and current enrolment figures for the following facilities, which are located within a c. 2 km radius. A list of the childcare facilities in the subject catchment area, within 2km of the subject site, is detailed in the table below as of April 2026. The maximum capacity figures for each facility are also noted:

	Childcare Facility	Service Type	Maximum Capacity
1.	Darndale Belcamp Integrated Service Ltd.	Full Day, Part-Time, Sessional	157
2.	Dolphin’s Early Education and Childcare Centre Clarevillage	Full Day	103
3.	Moatview Nursery & Early Education Centre	Part Time, Sessional	32 (Max 29pt)





4.	Hazelbrook Daycare Ltd. T/A Children's Choice	Full Day	22
5.	Little Blossoms Creche	Full Day	43
6.	Edenmore Early Education Centre	Full Day	55
7.	Giraffe Childcare Northern Cross	Full Day, Part-Time, Sessional	98
8.	First Steps Academy	Full Day/Part Time/ Sessional	132
9.	Bumblebee Montessori and Childcare	Sessional	52
10.	First Steps Academy Crèche & Montessori Ltd.	Sessional	40
11.	Tigers Childcare Balgriffin	Full Day, Part-Time, Sessional	107
12.	Bunratty Community Childcare Centre	Full Day, Part-Time	42
13.	T/A Bonnybrook Early Education Centre	Full Day	58 Full day care/ 62 Sessional
14.	Little Rainbows (Parkside Belmayne)	Full Day, Part-Time, Sessional	132 (120 Full Day Care)
15.	Little Rainbows (Main Street)	Full Day	85 Sessional, 75 Full Day Care
16.	Bunny Hops, Creche and Montessori LTD.	Full Day, Part-Time, Sessional	31
	Total	-	1,179

Table 5 – Capacity and Current Availability for Existing Child Care Facilities (March 2026)

The table above illustrates that there is a total of 16 no. childcare facilities within 2km of the site. The max capacity for the creches is 1,179 no. spaces. Capacity levels for each creche changes yearly due as childcare facilities cater for children from 0-4 years approximately, and due to their natural progression into primary school, spaces become available and are then refilled on an ongoing basis, so there is constant movement in capacity levels within the facilities.

It is considered that the facilities available in the surrounding area will be sufficient cater for the 10 no. childcare spaces that will be potentially required arising from the construction of the subject development. It is therefore considered wholly appropriate to not provide a creche facility as part of the subject development.

Please refer to the Social Infrastructure Audit undertaken as part of this Part 8 proposal for full details regarding creches in the wider surrounding area, and planned creches in the vicinity of the site.



8 Local Planning Policy Context

The Dublin City Development Plan 2022- 2028 is the statutory development plan that currently governs the development of the subject site. This section has been prepared to demonstrate the key policies and objectives for the development site, and the proposed developments compliance with same.

8.1 Land Use Zoning

The site zoning is included on Zoning Map Set B as included within the Dublin City Development Plan 2022-2028 and shown below:

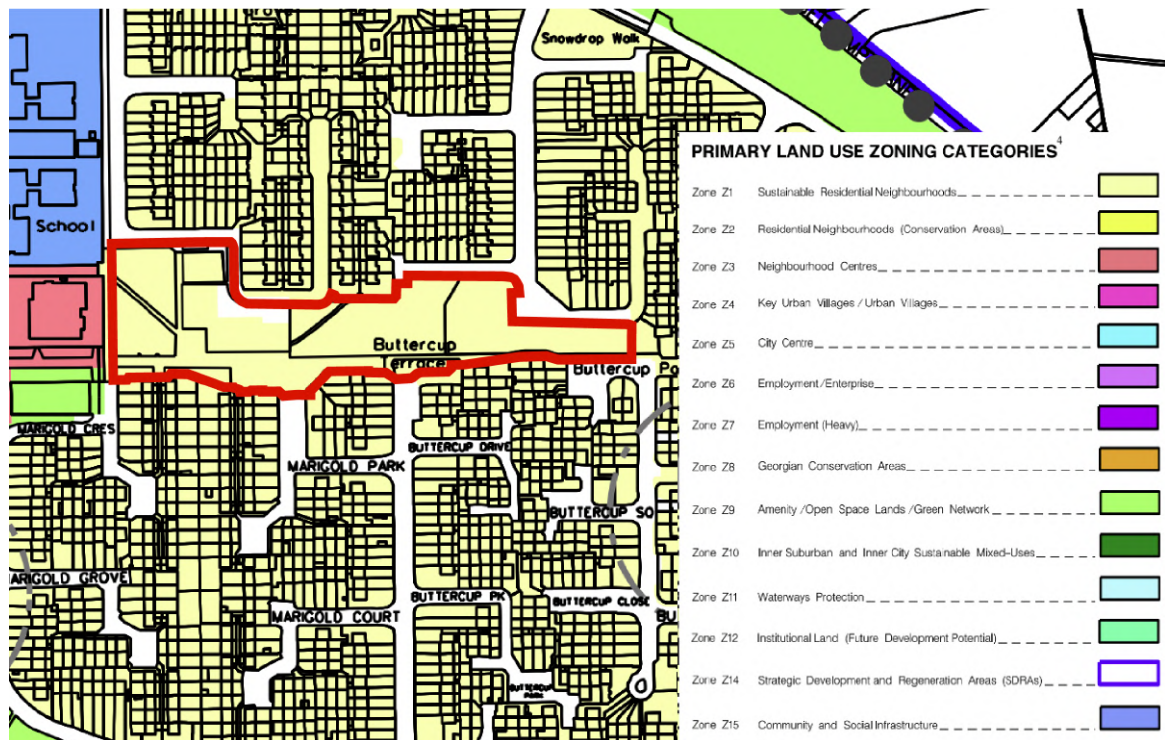


Figure 18 – Land Use Zoning Map – Dublin City Development Plan 2022 – 2028

The subject site is zoned Z1: Sustainable Residential Neighbourhoods within the Dublin City Development Plan 2022 – 2028, with an objective to protect, provide and improve residential amenities. The vision for development on Z1 zoned lands as included within the Dublin City Development Plan 2022-2028 is noted as follows:

‘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’.

It is then noted that:

‘In both new and established residential areas, there will be a range of uses that have the potential to foster the development of new residential communities. These are uses that benefit from a close relationship with the immediate community and have high standards of amenity, such as childcare facilities, schools, community facilities, personal services, local shops, open space, recreation and amenity uses’.

The following land uses are permissible in principle on Z1: Sustainable Residential Development zoned lands:

*‘Assisted living/retirement home, buildings for the health, safety and welfare of the public, childcare facility, **community facility**, cultural/recreational building and uses, delicatessen, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants, open space, place of public worship, public service installation, **residential**, shop (local), sports facility and recreational uses, training centre’.*

Residential development is a permissible land use under zoning objective Z1. It is considered that the proposed scheme presents a design solution that is appropriate for this location, and that the buildings will assimilate successfully into their surrounds.

8.2 Unit Mix

The proposal provides 84 no. units total, with 50 no. apartment units provided and 34 no. houses. The Dublin City Development Plan does not outline a required unit mix for developments providing houses. However it is submitted that the proposed development provides a variance of house types, providing 2, 3 and 4 bed units across the scheme.

Section 15.9.1 of the Dublin City Development Plan 2022-2028 outlines appropriate unit mixes for apartment developments. This states:

‘Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.’

The development plan then states that:

‘Standards may be relaxed for other social housing needs and/or where there is a verified need for a particular form of housing, for example for older people, subject to the adjudication of the Housing & Community Services Department’.

It is noted that Dublin City Council have published an interim Housing Needs Demand Assessment as an Appendix to the Dublin City Development Plan 2022-2028. The interim HNDA forecasts that throughout the plan period of 2022-2028 the Dublin City Administrative Area will require 27,219 new households. Of these, 10,247 no. social rented households are forecasted to be required during the lifetime of the plan.

The proposed development contributes towards the achievement of this target, with 50 no. apartments provided as part of this scheme, comprising 45 no. 1 bed apartments and 5 no. 2 bed apartments. The proposal has been brought forward in partnership with Dublin City Council, and the proposed unit mix has been supported by the Dublin City Housing Department, who have identified a need for this specific housing typology in this location.

8.3 Housing Policies

The following housing policies as included in Chapter 5: Quality Housing and Sustainable Neighbourhoods of the Dublin City Development Plan 2022-2028 are considered of direct relevance to the subject proposal:

QHSN 1: ‘To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines’.

QHSN 2: ‘To have regard to the DEHLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2020), ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets’ (DMURS) (2019)’.

QHSN 4: ‘To promote the transformation of the key regeneration areas into successful socially integrated neighbourhoods and promote area regeneration in parts of the city which require physical improvement and enhancement in terms of quality of life, housing and employment opportunities and to ensure a balanced community is provided in regeneration areas’.

QHSN 5: ‘To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation’

QHSN 8: ‘To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites’.

QHSN 9: ‘To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area’.

QHSN 22: ‘To support the concept of independent living and assisted living for older people, to support and promote the provision of specific purpose-built accommodation, including retirement villages, and to promote the opportunity for older people to avail of the option of ‘rightsizing’, that is the process of adjusting their housing to meet their current needs within their community’.

QHSN 35: ‘To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation’.

QHSN 17: ‘To support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland’s ‘Age Friendly Principles and Guidelines for the Planning Authority 2020’, the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2020’.

We confirm that the proposed development is in compliance with all relevant National, Regional, and Local policies relating to housing development.

8.4 House Developments

Section 15.11 of the Dublin City Development Plan 2022-2028 sets out the development standards for House Developments within the jurisdiction of Dublin City Council.

Section 15.11.1 states the following regarding floor areas for House Developments:

Houses shall comply with the principles and standards outlined in Section 5.3: 'Internal Layout and Space Provision' contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).

All houses provided comply with the standards outlined in 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007). Please refer to the Schedule of Accommodation prepared by Paul Keogh Architects now submitted as part of this Part 8 Proposal pack for details.

Section 15.11.2 states the following regarding Aspect, Daylight/ Sunlight and Ventilation for House Developments:

The orientation and layout of house units should maximise the use of natural daylight and sunlight as much as possible. Where feasible, the main habitable rooms (living / kitchen) should have south and/or west facades. Rear private garden should be sufficiently sized and orientated to ensure direct sunlight access is achieved for part of the day on March 21st. Living rooms shall not be lit solely by roof lights. Bedrooms solely lit by roof lights will be considered in certain circumstances on a case by case basis. All habitable rooms must be naturally ventilated and lit.

A Daylight/ Sunlight and Shadow Assessment for the proposed development has been carried out by Digital Dimensions as part of the subject proposal. Please refer to this document for details regarding the light achieved to internal habitable spaces and external amenity spaces, and an overview of the impact of the proposed development to neighbouring properties.

Section 15.11.3 states the following regarding Private Open Space areas for House Developments:

Private open space for houses is usually provided by way of private gardens to the rear of a house. A minimum standard of 10 sq. m. of private open space per bedspace will normally be applied. A single bedroom represents one bedspace and a double bedroom represents two bedspaces. Generally, up to 60-70 sq. m. of rear garden area is considered sufficient for houses in the city. In relation to proposals for house(s) within the inner city, a standard of 58 sq. m. of private open space per bedspace will normally be applied.

These standards may be relaxed on a case by case basis subject to a qualitative analysis of the development.

Where dwellings have little or no front gardens in urban settings, it is important that 'defensible space' is created behind the public footpath, for example, by means of a planting strip, and the design of ground floor windows will need to be carefully considered. Rear gardens and similar private areas should: be screened from public areas, provide safe and secure play areas for children, be overlooked from the window of a living area or kitchen, have robust boundaries, and not back on to roads or public open spaces.

It is considered that all houses provided have front and rear garden spaces that are appropriately screened from public areas.

All houses have been provided with rear gardens which meet or exceed the requirements as included in the Sustainable and Compact Settlements Guidelines for Planning Authorities, which supersede the requirements in the Dublin City Development Plan 2022-2028.

Section 15.11.4 states the following requirements for separation distances for House Developments:

At the rear of dwellings, there should be adequate separation between opposing first floor windows. Traditionally, a separation of about 22 m was sought between the rear first floor windows of 2-storey dwellings but this may be relaxed if it can be demonstrated that the development is designed in such a way as to preserve the amenities and privacy of adjacent occupiers. Careful positioning and detailed design of opposing windows can prevent overlooking with shorter back-to-back distances and windows serving halls and landings which do not require the same degree of privacy as habitable rooms.

All houses have separation distances which meet or exceed the requirements as included in the Sustainable and Compact Settlements Guidelines for Planning Authorities, which supersede the requirements in the Dublin City Development Plan 2022-2028.

8.5 Density

Appendix 3 of the Dublin City Development Plan 2022-2028 outlines the following general density range for developments within the ‘Outer Suburbs’ that will be supported:

- 60-120 Net Density Range (Units Per Hectare)

The proposed development provides a net density of 57 dph as per the density calculation requirements included within the Sustainable Residential & Compact Settlements Guidelines. It is considered that this density is in line with the density ranges applicable to the subject site included within the Dublin City Development Plan 2022-2028.

8.6 Plot Ratio & Site Coverage

Appendix 3 of the Dublin City Development Plan 2022-2028 outlines indicative plot ratio and site coverage figures for specific areas. For development in Outer Employment and Residential Areas the following indicative figures are noted:

- Plot Ratio – 1.0 – 2.5
- Site Coverage – 45 – 60%

The plot ratio of the proposal is 0.64 with a site coverage of 26.4%. Whilst the proposed plot ratio is below the indicative ratio of 1.0 – 2.5 included in the Plan, it is considered that this has arisen from a requirement to provide a development on the site that appropriately assimilates with its surrounds and protects the existing amenity levels of surrounding properties. In this regard, it is therefore considered that the proposed plot ratio and site coverage level is wholly appropriate.



8.7 Building Height

Appendix 3 of the Dublin City Development Plan 2022-2028 outlines the following in section 4.0 regarding the achievement of sustainable height and density:

‘The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, key urban villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development’.

It is submitted that the proposed development, at 2-3 storeys with a height of 10.95 metres at its tallest point, presents a height on the subject site that is wholly in line with the existing height of residential developments surrounding the site, at 2 storeys. Verified View Photomontages have been prepared by Digital Dimensions to demonstrate how the proposed building will assimilate successfully into its surrounds. A Daylight/ Sunlight and Shadow Assessment has also been prepared by Digital Dimensions, which demonstrates that the proposed development will have a negligible impact on surrounding existing properties.

8.8 Energy

A section of Policy QHSN11 includes that it is council policy to:

‘Promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance’

A Climate Action Energy Statement has been prepared in respect of the proposed development by Semple McKillop Consulting Engineers. Please refer to this document for details regarding the sustainability measures proposed as part of the subject development.

8.9 Car Parking

The subject site is designated as ‘Zone 3’ with regards to car parking and falls under the land use category of ‘Houses, Apartments, Duplex’, meaning that parking standards apply as follows:

- 1 space per dwelling

The proposed development provides 79 no. car parking spaces for the 84 no. units proposed, which is below the maximum car parking standard.

8.10 Cycle Parking

Section 3.1 of appendix 5 of the Dublin City Development Plan 2022-2028 outlines the following standards for parking provision for residential apartment units and residential dwellings:

- Apartments - 1 per bedroom and 1 visitor space per 2 bedrooms
- Houses – 1 per unit and 1 visitor space per 5 dwellings

The proposed development provides 84 no. units total with a mix as follows:

- 45 no. 1 bed apartments
- 5 no. 2 bed apartments
- 12 no. 2 bed houses
- 21 no. 3 bed houses





- 1 no. 4 bed house

The proposed development provides 95 no. cycle parking spaces for the apartment element of the development and 7 no. visitor spaces for the proposed houses. It is considered that all houses can store bicycles within the rear ground level private amenity spaces provided, in line with the guidance included in the Compact Settlements Guidelines.

This provision of bicycle parking complies with the above outlined standards as per the Dublin City Development Plan 2022-2028.



9 Conclusion

We invite the Planning Authority to consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- This document details how the proposed development accords with National, Regional and Local Planning Policies and Objectives, specifically the following: Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, NPF Implementation: Housing Growth Requirements 2025, Planning Design Standards for Apartments: Guidelines for Planning Authorities 2025, Urban Development and Building Height Guidelines (2018), The Planning System and Flood Risk Management (2009), Guidance on Appropriate Assessment for Planning Authorities (2009), Guidelines for Planning Authorities on Childcare Facilities (2001), Delivering Homes, Building Communities 2025-2030, National Planning Framework: Project Ireland 2040, Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019 – 2031, Transport Strategy for the Greater Dublin Area 2022 – 2042, Greater Dublin Area Cycle Network Plan, Design Manual for Urban Roads and Streets, Climate Action Plan 2025 and the Dublin City Development Plan 2022-2028.
- Considering the current housing needs within Dublin, and nationwide, we submit that this proposal is an opportunity to develop an underutilised site and provide for a much-needed type of housing in this area. The proposal on this infill site is an appropriate form of development at this location, surrounded by a range of local services.

We trust that Dublin City Council will consider the contents of this report, which proves that the proposed development complies with all relevant planning policy documents, and all other reports and drawings prepared as part of this application pack and will approve the subject Part 8 Proposal.