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Statement of Consistency with Planning Policy



**Proposed Strategic Housing Development
Lands at Clongriffin, Dublin 13**

Clongriffin SHD 1

Gerard Gannon Properties



1 Westland Square
Pearse Street
Dublin 2
Telephone: 01 2530220

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1.0 Introduction

Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, have prepared this Statement of Consistency with Planning Policy, on behalf of the applicant, Gerard Gannon Properties. This statement accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on lands at Clongriffin, Dublin 13.

The lands subject to this SHD application form part of a wider masterplan development proposal for Clongriffin which provides for a total of 1,950 residential units and c.22,727.5 sq.m. of commercial development across 15 no. blocks. The masterplan lands are divided into three separate planning applications, in accordance with the legislative provisions of the SHD process, such that two of which are SHD applications (Clongriffin SHD 1 and Clongriffin SHD 2) whilst the third application is being lodged to Dublin City Council under Section 34 of the Planning and Development Act, 2000 (as amended). The entire masterplan lands are being assessed within one Environmental Impact Assessment Report and within one Appropriate Assessment Screening Report. This statement of consistency relates to Clongriffin SHD 1.

The proposed development subject to this SHD application (i.e. Clongriffin SHD 1), will be provided in 9 no. blocks (i.e. Blocks 6, 8, 11, 17, 25, 26, 27, 28 & 29) at Clongriffin, Dublin 13. The proposed development will consist of the construction of a mixed-use development consisting of 1,030 no. apartments (421 no. one beds, 541 no. two beds, and 68 no. three bed units) of which 352 no. units are residential and 678 no. units are 'Build to Rent' residential units with c.2,421.3 sq.m. of ancillary residential communal facilities/space and a total of c.2,285.5 sq.m of commercial development which includes 2 no. childcare facilities, 10 no. retail units and 1 no. gym. The proposed 9 no. blocks will range in height from 3-17 storeys over basement and comprise an infill development that formed part of the overall masterplan granted for Clongriffin under Reg. Ref. 0132/02. The development will be provided on a site which extends to c.6.332 ha.

The proposed scheme has been informed by pre-planning consultations with Dublin City Council over a number of months as well as the pre-planning consultation with An Bord Pleanála. The proposed development on these lands is unique in that 80% of the infrastructure, including roads, a rail station, water and drainage, as well as social and community facilities are already in place. The proposed development is an infrastructure led development already served by a Quality Bus Corridor (QBC) and DART rail services at Clongriffin station. The proposal also completes the green route along Market Street which provides a link between Clongriffin Dart Station and Fr. Collins Park.

This Statement of Consistency with Planning Policy has been prepared in accordance with Section 8 (1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016 and in accordance with the requirements of the Planning and Development Regulations 2001-2017 (as amended by Planning and Development (Strategic Housing Development) Regulations 2017) and the 'Strategic Housing Development: Section 4 Applications to An Bord Pleanála – Guidance for Applicants' issued by An Bord Pleanála.

This Statement demonstrates that the proposed development is consistent with the relevant national, regional and local planning policy and guidelines issued under Section 28 of the Planning and Development Act, 2000 (as amended). This Statement should be read in conjunction with the accompanying detailed documentation prepared by the design team.

For further details of compliance with the quantitative standards for residential units as set out in the “*Sustainable Urban Housing: Design Standards for New Apartments*” and the Dublin City Council Development Plan 2016-2022, please refer to the Housing Quality Assessments (Detailed Schedules of Accommodation) and Architectural Design Statements prepared by CCK Architects and Wilson Architecture, which are included as part of the architectural planning packs.

2.0 National Policy and Guidelines

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following sections. The key national policy and guidance documents of relevance include:

- Project Ireland 2040: National Planning Framework
- Project Ireland 2040: National Development Plan 2018-2027
- Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)
- Sustainable Residential Development in Urban Areas and Best Practice Urban Design Manual Guidelines (2009)
- Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)
- Sustainable Urban Housing: Design Standards for New Apartments (March 2018)
- Retail Planning Guidelines for Planning Authorities 2012
- Retail Design Manual (2012)
- Childcare Facilities: Guidelines for Planning Authorities (2001)
- Design Manual for Urban Roads and Streets (DMURS)
- Urban Development and Building Heights: Guidelines for Planning Authorities (December 2018)
- Smarter Travel: A Sustainable Transport Future
- EIA Directive
- Birds and Habitats Directive – Appropriate Assessment
- The Planning System and Flood Risk Guidelines (2009)
- Climate Action Plan 2019

2.1 Project Ireland 2040: National Planning Framework

The National Planning Framework is “*the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040*”. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the National Planning Framework that “*a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages*”. It is also stated that there will be an ongoing shift in population and jobs to the east and to the counties around Dublin in particular. The NPF will support the future growth and success of Dublin as Ireland’s leading global city of scale, by better managing Dublin’s growth to ensure that more of it can be accommodated within and close to the city.

According to the National Planning Framework, Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice,

transport mobility and quality of life. Dublin's continued performance is critical to Ireland's competitiveness.

The NPF states that *"the long-term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future."*

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *"prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure"*.

In terms of Dublin City and the Metropolitan Area, the National Planning Framework 2040 states that: *"At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development."*

"The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village. This means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly 'greenfield' development and requires a change in outlook."

One of the key future growth enablers for Dublin specifically mentions Clongriffin for development: *"progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Adamstown, Cherrywood, Clonburris and Clongriffin"*. The proposed development, subject to this SHD application, forms part of the final development proposals intended to complete Clongriffin Town Centre. All such proposals are fully detailed in the accompanying masterplan for the lands.

The NPF has a number of national policy objectives which are relevant to this application, which include:

"National Policy Objective 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

"National Policy Objective 13: *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. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected."*

“National Policy Objective 33: 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 35: Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights”.

It is evident that there is a strong emphasis placed on increased building heights in appropriate locations within existing urban centres and along public transport corridors. As such, it is respectfully submitted that the proposed building heights ranging from 3 storeys to 17 storeys over basement is in line with Government guidance and evolving trends for sustainable developments in urban areas.

Downey Planning are of the considered opinion that the proposed development is in line with the objectives of the National Planning Framework as it states that *“to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.”* The National Planning Framework also states that *“this is underpinned by ongoing population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a higher proportion of households in the rented sector.”* The proposed mixed-use development is located in a strategic location in close proximity to Dublin’s City Centre. The National Planning Framework also states that *“while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (census data)”*. It is evident that Ireland is a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. It is stated within the Project Ireland 2040 plan that *“in many European countries it is normal to see 40-60% of households living in apartments.”*

Apartment developments have become an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts investment that will result in greater delivery of apartments in Ireland’s cities and towns and other appropriate locations. It is evident that apartment developments are required in urban areas to meet the current demand for housing, particularly in Dublin. It is therefore considered that the provision of 1,030 no. apartments with complementary, mixed land uses on the subject site will assist in achieving the objectives of the National Planning Framework.

In planning for urban employment growth, the NPF states that *“the pattern of urban growth targeted in the National Planning Framework is population and employment led, recognising that firms and enterprise development are drawn to urban locations by market forces such as agglomeration, migration, and specialisation that depend on factors such as scale, accessibility, innovation supported by higher education institutions and quality of life”*. The proposed mixed-use scheme, forming part of Clongriffin Town Centre, is consistent with the above statement, offering residents and businesses the opportunity to establish in a thriving new urban location within Dublin.

“National Policy Objective 10a: Regional and Local Authorities to identify and quantify locations for strategic employment development in the cities identified in Table 4.1”.

“National Policy Objective 10b: *Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally”.*

The plan states that *“projected employment growth in Ireland to 2040, although significant, is subject to our capacity to accommodate it. Sustainable enterprise thrives in supportive business environments that enhance competitiveness and productivity with good supporting infrastructure. There are also critical links between the quality of urban place-making and business investment/ job creation”*. Place-making is identified as a key differentiator in Enterprise 2025, Ireland’s National Enterprise Policy 2015-25. Furthermore, the NPF’s strategy is *“to focus a significant proportion of population growth in Ireland’s cities, while also seeking to improve urban infrastructure and amenities, livability/ quality of life and the quality of the built environment. This approach intends to ensure that we continue to provide an attractive range of enterprise development opportunities in the face of changing employment activity and sectors”*. The proposed development at Clongriffin is consistent with these aspirations offering mixed-use development in an established town centre setting.

The NPF *“targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village”*. The NPF further states that: *“this means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly ‘greenfield’ development and requires a change in outlook. In particular, it requires well-designed, high quality development that can encourage more people, and generate more jobs and activity within existing cities, towns and villages”*.

Clongriffin offers a unique opportunity to achieve high-quality, mixed-use development at a density and scale that is appropriate for this town centre location. The area is well served by public transport and benefits from an abundance of physical and social infrastructure as a significant amount of Clongriffin has been constructed to date.

The proposed development represents part of the final development proposals for Clongriffin, on the lands within the ownership of the applicant, in order to complete the town centre. This SHD application will provide 1,030 no. apartments of which 352 no. units are residential and 678 no. units are ‘Build to Rent’ residential units with c.2,421.3 sq.m. of ancillary residential communal facilities/space and a total of c.2,285.5 sq.m. of commercial development which includes 2 no. childcare facilities, 10 no. retail units and 1 no. gym. This proposed development will be delivered in tandem with the final development proposals for the wider area (3 separate applications) which collectively will provide 1,950 residential units and approximately 22,727.5 sq.m. of commercial development. In light of the above, it is submitted that the proposed development is consistent with the policies and objective of the NPF as a principal component of the NPF is to provide higher density development with increased building heights at appropriate urban locations which are well served by public transport.

2.2 National Development Plan

The National Development Plan sets out the investment priorities that will underpin the successful implementation of the National Planning Framework (NPF). This will guide national, regional and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

Resolving the systemic factors underlying the current housing crisis is at the heart of the NPF and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. In this regard, the NDP states that there is a *“need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.*

Furthermore, the NDP states that *“the continuation of existing patterns of development accentuates the serious risk of economic, social and environmental unsustainability through, for example, placing more distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse”.*

There are a number of strategic outcomes identified within the NDP which support the proposed development at Clongriffin. Such outcomes include:

National Strategic Outcome 1: Compact Growth – *This outcome aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns and villages. This will give scope for greater densities that are centrally located and in many cases publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating more attractive places for people to live and work in, facilitating economic growth and employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise”.*

National Strategic Outcome 4: Sustainable Mobility – *“The expansion of attractive and sustainable public transport alternatives to private based car transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision of safe alternative active travel options such as segregated cycling and walking facilities can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure”.*

The proposed development at Clongriffin is consistent with the NPD as it involves the consolidation of the masterplan area already partially developed at Clongriffin town centre. The proposed development will provide high density, sustainable residential development, coupled with the delivery of commercial units, all of which promotes compact urban growth and good quality of life. Clongriffin will be an attractive, vibrant urban centre for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities such as Fr. Collins Park, Mayne River Linear Park and the various sports clubs and centres within the area.

The proposed development in Clongriffin is also consistent with the sustainable mobility objectives outlined in the NDP. The completion of Clongriffin town centre will ensure walking and cycling are viable options for the community, with the area also very well served by existing public transport infrastructure (QBC and DART station), all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport. The provision of additional GoCar facilities on site will further support the use of sustainable transport.

National Strategic Outcome 7: Enhanced Amenity and Heritage – *The NPF recognises the value of cultural heritage as a key component of, and contributor to, the attractiveness and sustainability of our cities, towns, villages and rural areas in terms of developing cultural creative spaces, private inward investment, and attracting and retaining talent and enterprise. This includes all elements of living space including streets, public spaces, built heritage and natural amenity areas, cultural and sporting opportunities and sustainable transport networks, all of which play a central part in defining the character and attractiveness of places”.*

National Strategic Outcome 10: Access to Quality Childcare, Education and Health Services – *Access to quality primary education, health services and childcare, relative to the scale of a region, city, town, neighbourhood or community is a defining characteristic of attractive, successful and competitive places”.*

The proposed development, subject to this SHD application, will benefit from the living space already established within Clongriffin including the network of local streets, public spaces such as the town square and natural open spaces such as the linear park. Fr. Collins Park is also located within Clongriffin offering both active and passive recreation for the community such as a skate park, fitness trails, playgrounds, sports fields, and seating areas, all of which is spread across 26 hectares of green space. The proposed development will also be close to several schools, health services and childcare facilities, with additional facilities proposed as part of this application including 2 no. childcare facilities, 10 no. retail units and 1 no. gym in addition to the facilities proposed within the concurrent applications. This level of service and amenity provision ensures that Clongriffin is an attractive place to live and work. In light of the above, it is submitted that the proposed development is consistent with the National Development Plan.

2.3 Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

Rebuilding Ireland, an Action Plan for Housing and Homelessness, provides a multi-stranded, action-oriented approach to achieving many of the Government’s key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of 5 key pillars which are addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- Addressing the unacceptable level of households, particularly families, in emergency accommodation;
- Moderating rental and purchase price inflation, particularly in urban areas;
- Addressing a growing affordability gap for many households wishing to purchase their own homes;
- Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty;
- Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth; and,
- Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.

The provision of 1,030 no. apartments on this application site, with a further 920 no. apartments being proposed as part of the overall masterplan, will help the Government to achieve the objectives of the Housing Action Plan. 10% of the total units within the overall masterplan scheme (i.e. lands subject to two SHD applications and one application to DCC) are also proposed for social housing. Thus, it is submitted that the proposed development is consistent with the policy in this regard.

Furthermore, one of the five pillars which form the Action Plan refers to rental accommodation, it has a key objective of *“addressing the obstacles to greater private rented sector delivery, to improve the supply units at affordable rents,”* and emphasizes the importance of rental housing for enabling the housing market to adapt to the changing needs of the population. In order to *‘improve the rental sector’* which is the vision for this pillar, there are several key actions proposed as part of the Action Plan, these are as follows:

- *Develop a strategy for a viable and sustainable rental sector*
- *Introduce legislation on balanced arrangements for tenancy terminations*
- *Review the standards for rental accommodation*
- *Enhance the role of the Residential Tenancies Board*
- *Introduce an Affordable Rental Scheme*
- ***Encourage “build to rent”***
- *Support greater provision of student accommodation.*

Therefore, the ‘Build to Rent’ scheme is thoroughly encouraged. The document acknowledges that the country’s housing stock was not built with the needs of long-term renters in mind (at the time when the Action Plan was prepared), thus the proposed development would assist in the delivery of this scheme for the rental market and support the housing stock with the provision of 1,030 no. apartment units in this strategic location. It is important to note that the ‘Build to Rent’ model is supported by the *‘Sustainable Urban Housing: Design Standards for New Apartments’* guidelines and other statutory policy. For further details on the proposed development’s compliance with the Build to Rent guidance, please refer to the enclosed *‘Sustainable Neighbourhoods BTR Justification Report’* prepared by Downey Planning in conjunction with Liv Consult who specialise in Build to Rent developments in the UK.

In light of the above, it is submitted that the proposed development is consistent with the policy in this regard.

2.4 Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)

This document reviews and updates the Residential Density Guidelines (1999), and its aim is to assist both planning authorities and developers in meeting certain standards in the design of residential development. The main objective of the Sustainable Residential Development in Urban Areas Guidelines is to produce high-quality sustainable developments through providing:

- quality homes and neighbourhoods;
- places where people actually want to live, to work and to raise families; and,
- places that work - and will continue to work – not just for us, but for our children and for our children’s children.

The Guidelines state that sustainability is about the integration of schools, community facilities, employment, transport and amenities with the housing development process in a timely, cost-effective way.

The aim of the Guidelines is to set out the key planning principles which should be reflected in development plans and local area plans and which should guide the preparation and assessment of planning applications for residential developments in urban areas. These Guidelines support higher residential densities particularly for sites within town centre locations and along public transport corridors, as it states: *‘In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes’*. In this regard, the subject site forms part of Clongriffin Town Centre and is located adjacent to Clongriffin DART station and a QBC.

In terms of planning for sustainable neighbourhoods, there is focus on *“planning at the district or neighbourhood scale within larger towns and cities, whether on brownfield or green-field sites”*. The Guidelines state that *“national policy makes it clear that sustainability is not confined to the physical environment. Sustainability also includes the concept of stable, integrated communities, and planning for such communities must embrace both tangible issues – such as the timely provision of school places – and the intangible, such as people’s perception of what constitutes an attractive, secure environment in which to rear children. Planning objectives at the district / neighbourhood scale can thus be grouped under four main themes:*

- (a) Provision of community facilities;*
- (b) Efficient use of resources;*
- (c) Amenity / quality of life issues; and*
- (d) Conservation of the built and natural environment”*.

The document goes on to state that *“sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally”*. It then

outlines the importance of the provision of schools, community centres, healthcare facilities and district/neighbourhood centres use to the sustainability of communities. The lands at Clongriffin are unique in this context as many of these facilities are already in place, with c.22,727.5 sq.m. of additional commercial space proposed, which has the potential to significantly add to these provisions.

Existing community facilities in Clongriffin include the new Clongriffin Junction, a community centre officially opened in May 2018- this is a joint initiative between Gerard Gannon Properties and Dublin City Council. The facility is open to all members of the community. A second community facility called The Hub is located on Main Street. The Hub supports the local community and some of the weekly events held here include men's sheds, yoga classes, children singing and dancing classes and the Newman Dance Company. Gerard Gannon Properties have a positive relationship with the Trinity Sports and Leisure Club located just off The Hole in the Wall Road. The club aims to provide sporting and leisure amenities for the local catchment area, including Clongriffin. Gerard Gannon Properties are involved in making improvements to the club including the installation of new lighting, new signage and car park improvements. Praxis Care, located close to Clongriffin DART station, provides special needs care for the local community.

The new development, which includes c.22,727.5 sq.m. of commercial space, plans to provide more community facilities for the people of Clongriffin. Included in such proposals are a new community centre; gyms; childcare facilities; community spaces; and a cinema. The addition of these community facilities to the existing facilities will ensure the community of Clongriffin has access to an abundance of important amenities.

The Guidelines state that the *"definition of sustainable development includes maximising access to and encouraging use of public transport, cycling and walking. Spatial planning has a fundamental role in promoting more sustainable travel patterns and helping to reverse recent trends which have seen a decreasing share of people travelling to work by bus or bicycle or on foot"*. The proposed development at Clongriffin is consistent with this objective as it proposes a mixed use residential and commercial development in close proximity to high quality public transport and within walking/cycling distance of all amenities and facilities.

In relation to amenity/quality of life issues, *"public open space can have a positive impact on physical and mental well-being as it provides spaces to meet, interact, exercise and relax. It needs to be appropriately designed, properly located and well maintained to encourage its use. It is one of the key elements in defining the quality of the residential environment. Apart from the direct provision of active and passive recreation, it adds to the sense of identity of a neighbourhood, helps create a community spirit, and can improve the image of an area (especially a regeneration area). Well-designed open space is even more important in higher density residential developments"*. The proposed development at Clongriffin is unique in that quality open space has already been developed within walking/cycling distance of the proposed development. The proposed development will also create links between the open spaces to create a permeable, vibrant neighbourhood. Market Street has been identified as a key connector street between Belltree Park and Station Square (please refer to the Clongriffin Masterplan prepared by CCK Architects and the Landscape Masterplan prepared by Ronan MacDiarmada & Associates). Each apartment block also contains private and communal open space for residents.

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the *'Urban Design Manual – A Best Practice Guide'* and its 12 criteria, including Context; Connections; Inclusivity; Variety; Efficiency; Distinctiveness; Layout; Public Realm; Adaptability; Privacy/Amenity; Parking; and Detailed Design, of which Planning Authorities are recommended to assess planning applications. It is evident that the form, layout, architectural and landscaping design of the proposed development have been informed by the development's place and time. Well-designed homes in the right locations are fundamental to building strong, sustainable communities. Such communities will ensure Ireland's continued success in attracting and generating investment and improving the quality of life for residents.

Downey Planning are of the considered opinion that the proposed development represents a development that has been carefully and appropriately designed, giving full consideration to its neighbouring properties and will integrate successfully with its environs. The proposed development has had regard to the surrounding environment and carefully assesses the proposal in light of same. The development positively contributes to the character and identity of the surrounding neighbourhood. The proposed scheme is also considered to be of an appropriate density which will help to support efficient public transport. The aim of the proposal is to provide for the sustainable use of land in close proximity to a major public transport corridor within a town centre in the Dublin Area. It is submitted that the proposed development would be a positive addition to the surrounding built environment of Clongriffin and to the identity of the locality. Furthermore, it is considered that the proposed buildings will meet the aspirations of a range of people and the design and layout of such allows easy access by all. For further information on the proposed development's consistency with the Urban Design Manual, please refer to the Architectural Design Statements prepared by CCK Architects and Wilson Architecture.

2.5 Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)

The Department's policy statement *Delivering Homes, Sustaining Communities* provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is recognised as being central to creating a sustainable community.

Sustainable neighbourhoods are areas where an efficient use of land, high quality design and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.

The *Delivering Homes, Sustaining Communities* policy statement is accompanied by Best Practice Guidelines entitled *'Quality Housing for Sustainable Communities'*. The purpose of these Guidelines is to promote high standards in the design and construction and the provision of residential and services in new housing developments. Best use of land is encouraged and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of a new housing

scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

This planning application is accompanied by Housing Quality Assessments (HQAs) prepared by CCK Architects and Wilson Architecture, which demonstrate the proposed development is compliant with the relevant standards in the Quality Housing for Sustainable Communities document and the Dublin City Development Plan 2016-2022.

2.6 Sustainable Urban Housing: Design Standards for New Apartments (March 2018)

The recently adopted “*Sustainable Urban Housing: Design Standards for New Apartments*” build on the content of the 2015 apartment guidance, much of which remains valid, particularly with regard to design quality safeguards such as internal space standards for apartments, internal storage and amenity space. The Guidelines state that “*in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland’s five cities (Dublin, Cork, Limerick, Galway and Waterford), more than 30,000 of which are required in Dublin City and suburbs, which does not include additional pent-up demand arising from under-supply of new housing in recent years.*” It is also stated that it is “*critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.*”

The Guidelines also state that “*aspects of previous apartment guidance have been amended and new areas addressed in order to:*

- *enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- *make better provision for building refurbishment and small-scale urban infill schemes;*
- *address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and*
- *remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduces costs”.*

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

The Guidelines state that “*ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include:*

- *Young professionals and workers generally;*
- *Those families with no children;*
- *‘Downsizers’; and,*
- *Older people, in both independent and assisted living settings”.*

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard, it is considered that the proposed development falls within (1) *Central and/or Accessible Urban*

Locations as it meets the criteria for this location in that the site is within easy walking distance of a high frequency urban rail service and is serviced by a Quality Bus Corridor (QBC), i.e. the Clongriffin DART station is located immediately adjacent to the subject site and the Malahide Road QBC also services the site. This type of location is also suitable for large scale and higher density development. Thus, it is considered that the subject site is suitable for a higher density apartment development as proposed.

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

Specific Planning Policy Requirement 1: *Apartment 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. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).*

Specific Planning Policy Requirement 3- Minimum Apartment Floor Areas:

- *Studio apartment (1 person) 37 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*
- *2-bedroom apartment (4 persons) 73 sq.m*
- *3-bedroom apartment (5 persons) 90 sq.m*

In relation to Build-to-Rent (BTR) apartments, the Guidelines define these as “*purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord*”. A key point outlined in the Guidelines states that “*the provision of dedicated amenities and facilities specifically for residents is usually a characteristic element. The provision of such facilities contributes to the creation of a shared environment where individual renters become more integrated and develop a sense of belonging with their neighbours in the scheme. This provides the opportunity for renters to be part of a community and seek to remain a tenant in the longer term, rather than a more transient development characterised by shorter duration tenancies that are less compatible with a long term investment model. There are a range of potential facilities that may be provided in conjunction with BTR in other jurisdictions such as dedicated laundry facilities, communal leisure areas, gym, workspaces/hotdesks, concierge service, etc. Facilities may also include private dining rooms, kitchen areas, office spaces, TV/lounge rooms, etc. that can be booked on occasion by individual residents for their own use*”.

In this regard, the overall proposed development subject to the 3 no. applications at Clongriffin provides for 1,950 no. apartments (49 no. studios, 715 no. one beds, 1,073 no. two beds, and 113 no. three bed units) of which 820 no. units are residential and 1,130 no. units are ‘Build to Rent’ residential units. The Build to Rent units are proposed within 8 no. blocks (Blocks 4, 6, 13, 14 (b), 17, 25, 26 & 27) with 3,534.6 sq.m. of ancillary Build to Rent residential amenity facilities are also proposed for the 1,130 units with additional communal facilities also provided for the 820 residential units.

The overall 3 no. applications also provide for 22,727.5 sq.m. of commercial development including c.30 no. retail units, 10 floors of office suites, community room, men’s shed, 3 no. creche facilities, an 8-screen cinema, 1 no. commercial gyms, 7 no. cafés/restaurants, in addition to the 4,335.1 sq.m. of residential support amenities/facilities (e.g. residents meeting rooms, resident’s gym, resident’s

cinema room, etc.) proposed across all blocks. The development also includes car parking (1,328 no. spaces across all blocks), bicycle parking (3,525 spaces across all blocks and 56 no. spaces at Station Square), landscaping including playgrounds, public open space parks and all associated works. Downey Planning are of the professional opinion that the proposed development complies with the SPPRs/requirements of the recently adopted *Sustainable Urban Housing: Design Standards for New Apartments*. The proposed Build to Rent amenity provision is further detailed in the enclosed 'Sustainable Neighbourhoods Build to Rent Justification Report' prepared by Downey Planning.

The application also includes Housing Quality Assessments, a detailed daylight, sunlight and internal light analysis report, and Building Lifecycle Report in accordance with Chapter 6 of the Guidelines. The proposed development will help to meet the current demand for apartment type developments. For further information in this regard, please refer to the enclosed architectural drawings and detailed 'Housing Quality Assessment' schedules prepared by CCK Architects and Wilson Architecture, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

The Guidelines also note the following with regard to aspect of units under Specific Planning Policy Requirement 4 which states:

"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 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) 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 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects".

The development in this instance is located at a central/accessible location within Clongriffin town centre and adjoining public transport, including the Clongriffin train station and the existing QBC bus corridor. In this regard, the minimum requirement for dual aspect units is 33%. However, SHD 1 provides for approximately 58.45% of dual aspect units overall, with the minimum being 46% dual aspect achieved and as such exceeds the minimum requirement under SPPR 4 of the Guidelines.

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

"Children's play needs around the apartment building should be catered for:

- within the private open space associated with individual apartments;*

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

The playgrounds have been given safe access and are located in a central communal open space within sight of different apartment buildings. Therefore, it is submitted that the proposed development is consistent with the Guidelines in this regard. For further information in this regard, please refer to the enclosed landscape drawings prepared by Ronan McDiarmada Landscape Architects.

In relation to bicycle and car parking requirements, the Guidelines state that it must be ensured that *“new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors”*. The required quantity for cycle parking spaces to be provided include; a general minimum standard of 1 cycle storage space per bedroom shall be applied, at least 1 cycle storage space shall be provided for studio units, and visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. The proposed development subject to this SHD 1 has provided a total of 1,883 no. bicycle spaces, in high quality, safe and accessible locations throughout the scheme, in accordance with the pertaining Guidelines. This is considered to be in accordance with the requirements of the Guidelines and greatly exceeds the Development Plan Standards for Clongriffin and was considered an acceptable level of bicycle parking by the Transport Department of Dublin City Council.

As stated within the Guidelines, *“the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria”*. The proposed development is situated in a strategic highly accessible location within a town centre and in close proximity to a rail line/LUAS/high frequency bus network, and as such the car parking provision can be minimised, substantially reduced or eliminated in certain circumstances. In this regard, a detailed car parking strategy has been prepared by Waterman Moylan Consulting Engineers for the overall masterplan lands at Clongriffin which provides for an appropriate quantum of development to serve the proposed residential and commercial development as part of these concurrent applications. This car parking strategy also envisions the provision of additional GoCar services for the community at Clongriffin.

Specific Planning Policy Requirement	Compliance
SPPR1 <i>(Housing Mix)</i>	In compliance
SPPR2 <i>(Building Refurbishment and Urban Infill Development on sites up to 0.25ha)</i>	Not Applicable; SPPR1 applies to the entire development
SPPR3 <i>(Minimum Apartment Floor Areas)</i>	In compliance with the standards

SPPR4 (Dual Aspect Ratios)	In compliance with the requirements
SPPR5 (Floor to Ceiling Height)	In compliance with the requirements
SPPR6 (Lift and Stair Cores)	In compliance with the required quantum
SPPR7 (Specific BTR Developments)	In compliance; tenures have been described where relevant; <i>Resident Support Facilities</i> and <i>Residents Services and Amenities</i> are provided within the proposed scheme
SPPR8 (Qualified as BTR Developments)	In Compliance
SPPR9 (Shared Accommodation Developments)	Not Applicable

Table 1 – Compliance with Specific Planning Policy Requirements

2.7 Retail Planning Guidelines 2012

The Retail Planning Guidelines, which were first issued in 2000 and subsequently revised in 2005 and 2012, provide the strategic policy framework for the spatial distribution of new retail development. In addition, the Guidelines provide a comprehensive framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and retailers and developers in formulating development proposals. The guidelines specifically state that retailing should generally be directed into existing settlements, while having regard to the sequential approach in relation to the appropriate location for new retail development that is not capable of or suitable for town centre locations.

The Guidelines confirm that the key challenge to be faced is how to accommodate the additional development that is projected to be required, in a way which is efficient, equitable and sustainable. It is vital to establish the optimum location for new retail development which is accessible to all sections of society and is of a scale which allows the continued prosperity of traditional town centres and existing retail centres and facilitates a competitive and healthy environment for the retail industry. This can only be achieved if strategic retail policies and proposals are incorporated into the development system. The guidelines also state that retail development can thus be guided by development plans.

The guidelines identify five key objectives, of equal weight, which are as follows:

- to ensure that in future all Development Plans incorporate clear policies and proposals for retail development,
- to facilitate a competitive and healthy environment for the retail industry of the future,
- to promote forms of development which are easily accessible, particularly by public transport and in a location which encourages multi-purpose shopping, business and leisure trips,
- to support the continuing role of town and district centres, with
- a presumption against large retail centres located adjacent or close to existing, new or planned national roads/motorways.

The Guidelines clearly acknowledge that it is critical for the proper planning and sustainable development of an area that new retail development is located at the optimum location having regard to the type of retail offering and the context of the existing environs.

In this regard, the proposed development is located on lands zoned for mixed-uses as part of the delivery of Clongriffin town centre. Clongriffin has already established retail development on site which are either operational or unoccupied at present. The overall proposed development provides for additional retail floor space to the town in the form of smaller, individual units dispersed mostly to the southern end of the development on the main streets and nearest to the town centre. Such development has been subject to a Masterplan, with retail provision having previously been granted on the lands. Thus, it is submitted that the proposed development is consistent with the Retail Planning Guidelines 2012.

2.8 Retail Design Manual – A companion document to the Retail Planning Guidelines for Planning Authorities (2012)

In summary, the Retail Design Manual is “intended to provide a planning framework for future development of the retail sector in a way which meets the needs of modern shopping formats while contributing to protecting, supporting and promoting the attractiveness and competitiveness of city and town centres as places to live, work, shop and visit”. It states, “*one of the key messages of the Guidelines is that a high quality of design in retail development can make an important contribution to delivering quality in the built environment*”.

The key principles of urban design as outlined in the manual are:

1. Design quality	6. Density and mixed use
2. Site and location	7. Public realm
3. Context and character	8. Built form
4. Vitality and viability	9. Environmental Responsibility
5. Access and connectivity	10. Sustainable construction

Downey Planning are of the considered opinion that the proposed development at Clongriffin meets the key principles of the *Retail Design Manual* as listed above. A Retail Design Guideline for Clongriffin has been prepared by CCK Architects which is enclosed with this application. The proposed retail units (10 no. units within Clongriffin SHD 1) will comply with these guidelines. The proposed development is a well-designed, high density mixed use residential and commercial town centre development with excellent public transport links, the potential for significant levels of walking/cycling and with a focus on strong urban form and environmental sustainability. Thus, it is submitted that the proposed development is consistent with the Retail Design Manual.

2.9 Childcare Facilities: Guidelines for Planning Authorities (2001)

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

For housing, the Guidelines provide a benchmark provision of one childcare facility per 75 dwellings (i.e. 20 child spaces per 75 dwellings) is recommended. In accordance with the Guidelines, creches have been provided within Clongriffin to date, with two currently operating in the town. It is important to note that there are 13 no. childcare facilities within 2km of the Masterplan lands. In order to calculate the childcare provision required for the proposed development, 764 no. units have been discounted due to being either studios or 1 bed apartments. Thus, the proposed development intends to provide an additional three childcare facilities as part of Blocks 4, 6, and 27 which will provide for a further c.180 children. It is noted that there is also one existing facility currently lying vacant located on Marrsfield Avenue which can accommodate a further c.50 children. In light of the above, it is submitted that the current provision of childcare facilities in the area, coupled with the three additional facilities proposed, is consistent with the Childcare Facilities Guidelines.

2.10 Design Manual for Urban Roads and Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) 2013 sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The Transport drawings and documentation prepared by Waterman Moylan Engineers provide further details in respect of the compliance of the proposed development with the provision of DMURS. Waterman Moylan Consulting Engineers have also prepared a Statement of Compliance regarding transportation within the Engineering Assessment Report which is enclosed as part of this SHD application.

2.11 Urban Development and Building Heights Guidelines for Planning Authorities (Dec 2018)

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

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

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

Section 1.10 of the Guidelines state *“the rationale...for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas”*. It continues, *“in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality”*.

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

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

The proposed development at Clongriffin is consistent with these objectives and with the physical and social infrastructure already in place can easily accommodate taller buildings.

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

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

The proposed development at Clongriffin is situated at a strategic location within the town centre immediately adjoining the train station, and is capable of supporting taller buildings and increased density. The site is excellently served by public transport, bus and rail with a proposed Bus Connects route designed to serve the area. Furthermore, a landmark building has been identified within the local plan for the area at Block 17 with the overall SDRA capable of accommodating medium tall buildings under the Development Plan and as such are suitable for increased density and height.

Specific Planning Policy Requirement 2 – *“In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities”*.

The proposed development seeks to provide for a mixed tenure type development with Build to Rent, private Build to Sell/Let and social housing. Furthermore, there will be a mix of uses within the development itself comprising childcare facilities as well as residential amenity facilities, such as gyms and meeting rooms. This will all add to the variety and mix of the development as well as creating active frontage and animation to the centre of Clongriffin. This is essentially the completion of Clongriffin Town centre, the final phase of a larger redevelopment of the applicant's landholding around Clongriffin, which will see a range of commercial, leisure and retail development taking place in conjunction with residential developments. An indicative phasing of development has been prepared and enclosed with the application which provides for the construction of the Main Street and Marrsfield Crescent within the first phase thus completing the town centre. The proposed development is a cornerstone of the development as it will create the critical mass of people required to support the existing and planned town centre of Clongriffin.

Specific Planning Policy Requirement 3: - *"It is a specific planning policy requirement that where;*

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

It is submitted that this SHD application contains sufficient reports, documentation, plans and justification to support the proposed development and outlines how the development is in accordance with the relevant planning policies and guidelines pertaining to the area. Such documents include architectural plans and elevations, architectural urban design statements, masterplan, DMURS statements, Traffic Assessment, AA Screening, planning reports, engineering reports and daylight and shadow analysis.

Specific Planning Policy Requirement 4 – *"It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

1. *The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;*
2. *A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
3. *Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more".*

The proposed development provides for a high-density development of 1,030 no. units (density of 163 units per hectare including the public open space areas) across 9 no. apartment blocks that will range

in height from 3-17 storeys over basement. The overall density of development subject to the concurrent applications (i.e. 1,950 units on the masterplan site area of 11.4 ha) provides for a density of 171 units per hectare. The overall density across the entire Clongriffin Area including the constructed, permitted and proposed units provides for 83 units per hectare (4,518 units on an overall site area of 53.56 hectares when the 3 no. sites outside the ownership of the applicant are included) or 79 units per hectare (4,220 units on an overall site area of 53.56 hectares when the 3 no. sites outside the ownership of the applicant are excluded).

It is respectfully submitted that the density proposed is in accordance with the national guidelines referred to in SPPR 4. Furthermore, the development will provide for a range of building types and heights that have been designed by separate architectural practices, working in conjunction with each other, to ensure that there is an appropriate variety of design and unit typology being achieved.

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments and that greater heights and taller buildings are achievable. The proposed development at Clongriffin is very well served by public transport and therefore can be expected to achieve high density residential development. Allowing for some tall buildings will help to achieve this aim.

Specific Planning Policy Requirement	Compliance
SPPR1 <i>(building height and density)</i>	In compliance
SPPR2 <i>(building height and mix of uses)</i>	In compliance
SPPR3 <i>(Assessment of planning applications)</i>	In compliance in light of content of application submission
SPPR4 <i>(development of greenfield/edge of city/town centre sites)</i>	In compliance

Table 2 – Compliance with Specific Planning Policy Requirements

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments and that greater heights and taller buildings are achievable. Clongriffin comprises existing heights of 2- 6 storeys with planning permission granted for taller buildings in proximity to the Train Station including a similar height at Block 17 under Ref. 3634/16 (ABP Ref. PL29N. 248713). Clongriffin is a large mixed-use development well served by public transport (DART and QBC) and therefore can be expected to achieve high density residential development. Allowing for some tall buildings will help to achieve this aim.

2.12 Smarter Travel: A Sustainable Transport Future

In summary, Smarter Travel: A Sustainable Transport Future states that *“to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility.”*

The 5 key goals of this transport policy are as follows:

- Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.
- Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.
- Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.
- Reduce overall travel demand and commuting distances travelled by the private car.
- Improve security of energy supply by reducing dependency on imported fossil fuels.

It is considered that the proposed development complies with *Smarter Travel: A Sustainable Transport Future*. The subject site is strategically located within 100 metres walking distance of the Clongriffin DART station and is serviced by the Malahide Road QBC. The proposed development provides housing and town centre uses within Clongriffin town centre and immediately adjacent to a DART line/QBC which will promote a modal shift to sustainable transportation. The proposed development also provides considerable secure, covered bicycle parking for future residents and visitors to again encourage use of sustainable modes of transportation.

The proposed development also provides considerable secure, covered bicycle parking for future residents and visitors to again encourage use of sustainable modes of transportation. This can also be noted within the scheme with an enhanced permeability and connectivity to adjoining sites, which also includes Market Street facilitated by the design team and within the subject lands. It is evident that the proposed scheme's main aim is to facilitate and support the use of sustainable transport, particularly by facilitating connectivity to the existing train station, station square and Father Collins Park.

Furthermore, the proposed development has also included GoCar services as part of the overall scheme. GoCar is a sustainable car sharing service, and by allowing multiple people to use the same vehicle at different times it reduces car ownership and car dependency, congestion, noise and air pollution, and frees up land traditionally used for parking spaces, thus promoting more sustainable modes of transport.

Therefore, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation.

2.13 EIA Directive

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

The proposed development provides for a total of 1,950 residential units and c.22,727.5 sq.m. commercial development. Noting the mandatory requirements for an EIA, the proposed development exceeds the thresholds and as such requires an Environmental Impact Assessment to be undertaken. In this regard, an EIAR has been prepared and is enclosed with this planning application. Please refer to the enclosed EIAR which assesses the overall masterplan development and is enclosed with this SHD application for the consideration of the Board.

2.14 Bird and Habitats Directive – Appropriate Assessment

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). OPENFIELD Ecological Services has prepared a report for Screening for Appropriate Assessment for the proposed development. This screening report has evaluated the proposed development at Clongriffin to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use.

The screening report concludes that this proposed development is not located within or directly adjacent to any SAC or SPA but pathways do exist to a number of these areas. An assessment of the aspects of this project has shown that significant negative effects are not likely to occur to these areas either alone or in combination with other plans and projects. The Appropriate Assessment procedure is therefore concluded at this Screening Stage and a detailed (Stage 2) Appropriate Assessment is not required. For further information in this regard, please refer to the Appropriate Assessment Screening Report prepared by OPENFIELD Ecological Services.

2.15 The Planning System and Flood Risk Guidelines (2009)

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

In accordance with these Guidelines, Waterman Moylan Consulting Engineers have carried out a flood risk assessment of the subject site. The site has been assessed in accordance with the Flood Risk Management Guidelines, with appropriate mitigation measures proposed such as SuDs design, overland flood routing, appropriate floor levels, and regular inspections. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy. For further information in this regard, please refer to the Flood Risk Assessment report prepared by Waterman Moylan Consulting Engineers which accompanies this application.

2.16 National Adaptation Framework: Planning for a Climate Resilient Ireland

In accordance with the Climate Action and Low Carbon Development Act 2015, this National Adaptation Framework (NAF) specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This NAF and its successors will set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are mainstreamed into all local, regional and national policy making.

The 'Built Environment and Spatial Planning' section within this Framework recognises that *"climate change considerations need to be taken into account as a matter of course in planning-related decision making processes and that the deepening of adaptation considerations in the planning and building standards processes is considered the most appropriate way of increasing the resilience of the built environment"*. Furthermore, *"effective planning reduces vulnerability to the negative effects of climate change by integrating climate considerations into decision making in order to avoid inappropriate forms of development in vulnerable areas and promoting compact development in less vulnerable areas"*. It is important to mention that this Framework envisions 'flood resilience' and 'access to wildlife and green space' as no-regret benefits of effective adaptation which would continue to be worthwhile regardless of future climate scenarios.

As such, the proposed development has taken into consideration the context of the site and it can be noted that a Flood Risk Assessment has been prepared by Waterman Moylan Consulting Engineers, with appropriate mitigation measures proposed such as SuDs design, overland flood routing, appropriate floor levels, and regular inspections. Thus, proposing a mixed-use development with access to high-quality green space, the provision of accessible roof terraces and introduction of best practice energy efficiency measures as required to meet the Energy Strategy and Building Regulations, and promoting a compact urban form for 'less vulnerable areas' is consistent with this national framework.

2.17 Climate Action Plan 2019

Climate disruption is already having diverse and wide-ranging impacts on Ireland's environment, society, economic and natural resources. The Climate Action Plan 2019 sets out an ambitious course of action over the coming years to address this issue. The Plan clearly identifies the nature and scale of the challenge. It outlines the current state of play across key sectors including Electricity, Transport, Built Environment, Industry and Agriculture and charts a course towards ambitious decarbonisation targets. The Plan sets out governance arrangements including carbon-proofing policies, establishment of carbon budgets, a strengthened Climate Change Advisory Council and greater accountability to the Oireachtas.

The Plan clearly recognises that Ireland must significantly step up its commitments to tackle climate disruption. The leadership role both the Government and public bodies can play in taking early action on climate is fundamental to achieving our decarbonisation goals. The Plan notes that the built environment accounted for 12.7% of Ireland's greenhouse gases in 2017. It is important that we improve the energy efficiency of our buildings, including our homes, workplaces and schools, by

meeting higher energy performance standards and by increasing retrofit activity. This will not only reduce Ireland's dependence on fossil fuels, but will also improve our living standards by making our buildings more comfortable, healthier, safer, and less costly to heat.

Our buildings are 70% reliant on fossil fuels, including oil fired boilers; over 80% of our homes and other buildings assessed for their BER have a rating of C or worse; and the current annual retrofit activity for existing stock is far too limited (approximately 23,000, mainly shallow, retrofits). A hierarchy of the most cost effective investments underpin this, including:

- Improving the fabric of buildings
- District heating in commercial buildings
- Switching from oil burners to heat pumps
- Setting new building standards.

The Plan notes that district heating networks also have several characteristics that are attractive for climate mitigation policy, particularly those that use a renewable heat source, or heat that is currently wasted, such as from power stations or data centres. Heat networks can be very versatile as they are not bound to one source. They can be supplied by waste heat, gas boilers, biomass boilers or heat pumps.

As such, the proposed development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions in line with the requirements of the Action Plan.

3.0 Regional Policy and Guidelines

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly)
- Transport Strategy for the Greater Dublin Area 2016-2035

3.1 Regional Spatial and Economic Strategy

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

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

key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal is the following;

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

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

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

The RSES identifies Clongriffin as being within Dublin City and its suburbs, and forming part of the North Fringe which offers large scale urban expansion creating new communities along the North-South (DART) Strategic Development Corridor (Northern/south-eastern commuter lines and DART expansion programme). The DART Expansion Programme proposes electrification of the Northern commuter line, which is estimated to be delivered by 2027 and will support increased capacity at key nodes, including ongoing large-scale urban expansion of the North Fringe of the city served by Clongriffin Station.

The proposed development at Clongriffin is located on brownfield urban lands and provides for a high-density residential development in close proximity of a train station and a high frequency bus network. As part of the proposed scheme, a walking and cycling priority green link to Clongriffin Train Station along Market Street is being proposed. It is submitted that the provision of a high quality and high-density residential development consisting of 1,030 no. apartment units as proposed within this SHD application at Clongriffin will assist in achieving the aforementioned objectives and it also complies with the pertaining policies and standards. For further details on how the proposed development is in accordance with these policies, please refer to the Housing Quality Assessments and Architectural Design Statements prepared by CCK Architects and Wilson Architecture which are included as part of the architectural planning packs.

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies. RPO 4.1 states:

“In preparing Core Strategies for development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National

Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.”

RPO 4.2 states:

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

It is submitted that the proposed development on existing zoned, serviced lands will adhere with the policies and objectives of the Regional Spatial and Economic Strategy for the Eastern & Midland Regional Assembly area and will contribute in providing additional housing units and employment opportunities within the existing envelop of Dublin City and Suburbs.

3.2 Transport Strategy for the Greater Dublin Area 2016-2035

This transport strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). The purpose of the Strategy is: *“To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.”*

The core of the strategy seeks the better integration of land use planning and transport planning. This can be achieved through the consolidation of development into higher order centres. In terms of the provision of housing, the strategy seeks to directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.

The proposed development at Clongriffin which seeks to redevelop infill sites within walking distance of a DART station/QBC, is considered an appropriate form of development in the context of supporting the vision and objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.

4.0 Local Planning Policy

This section of the report provides an account of the relevant local planning policy framework pertaining to the application site and proposed development, all of which is contained within the Dublin City Council Development Plan 2016-2022 and the Clongriffin-Belmayne Local Area Plan 2012-2018.

4.1 Dublin City Council Development Plan 2016-2022

4.1.1 Overarching Considerations

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

“Within the next 25 to 30 years, Dublin will have an established international reputation as one of Europe’s most sustainable, dynamic and resourceful city regions. Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, a vibrant culture and a diverse, smart, green, innovation-based economy. It will be a socially inclusive city of urban neighbourhoods, all connected by an exemplary public transport, cycling and walking system and interwoven with a quality bio-diverse green space network. In short, the vision is for a capital city where people will seek to live, work, experience, invest and socialise, as a matter of choice”.

“Our 30 year vision is for a zero carbon city with all energy coming from renewable energy sources. All buildings will have been built or retrofitted to near zero energy building standards, which will provide comfortable, warm, living and working environments. We will halve the use of ‘conventionally-fuelled’ cars in urban transport by 2030 and phase them out by 2050; achieve essential CO2-free city logistics in Dublin by 2030. Within 30 years we will move close to zero fatalities in road transport. In line with this goal, we will aim to halve road casualties by 2022. This council will work with its neighbouring local authorities and the National Transport Authority to achieve a doubling of all active travel and public transport trips and to halve private vehicular trips to Dublin by 2030”.

4.1.2 Core Strategy & Housing Strategy

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

The North Fringe lands (Clongriffin/Belmayne) have been identified as a Strategic Development and Regeneration Area (SDRA). *‘The north fringe action area plan was first produced for the North Fringe lands in 2000, setting out the objective to extend the metropolitan core and create a new dynamic mixed-use urban quarter’.* Further to this, Clongriffin/Belmayne is designated a Key District Centre (KDC) positioning it in the top tier of urban centres outside the city centre.

The vision of the Dublin City Development Plan is to grow Dublin in a sustainable fashion as it enters a period of sustained economic and population growth. *‘Dublin city in its entirety lies within the metropolitan area and the RPGs give direction to Dublin city as the ‘gateway core’ for high-intensity clusters, brownfield development, urban renewal and regeneration’.* Significant housing demand exists in the Dublin city area and several Strategic Development and Regeneration Areas (SDRAs) have been identified to try and meet this demand; the area of Clongriffin/Belmayne is one of these locations.

Further to this, the plan states ‘a further key aspect is that future expansion, whether housing or mixed-uses, occur in tandem with high-quality rail-based public transport and on a phased basis. The development plan incorporates these principles in a settlement hierarchy which prioritises the inner city, key district centres and strategic development and regeneration areas (SDRAs)’.

The site in question is part of a SDRA, is designated as a Key District Centre (KDC) and is located adjacent to Clongriffin DART station and the Malahide Road QBC ensuring development of these lands is consistent with development plan policy. The Development Plan estimates that 7,100 residential units can be produced within the SDRA1. The overall proposed development provides for a total of 1,950 of these units (of which 1,030 units are subject to this SHD 1 application), in accordance with the objectives of the Development Plan. This is in addition to the housing units already delivered or under construction within Clongriffin.

Table E – Capacity of Sub-areas of the City for Residential Development.

	Estimated Capacity – Number of Residential Units
Inner City Area (excluding SDRA 7, SDRA 18, and SDRAs 10–16 inclusive)	8,900
SDRA 1 North Fringe (including Clongriffin/Belmayne)	7,100
SDRA 2 Ballymun	3,000
SDRA 3 Ashtown/Pelletstown	1,000
SDRA 4 Park West/Cherry Orchard	2,000
SDRA 5 Naas Road lands	2,100
SDRA 6 Docklands (including SDZ area and Poolbeg West)	4,600
SDRA 7 Heuston Station and Environs	1,200
SDRA 8 Grangegorman and Environs	800
SDRA 9 St Michael’s Estate	500
SDRA 10 Dominick Street	200
SDRA 11 O’Devaney Gardens	1,000
SDRA 12 St Teresa’s Gardens	800–1,000
SDRA 13 Dolphin House	600
SDRA 14 Croke Villas and Environs	100
SDRA 15 St James’s Medical Campus and Environs	500
SDRA 16 Liberties (including Newmarket and Digital Hub)	2,500
SDRA 17 Oscar Traynor Road	650–700
SDRA 18 National Concert Hall	350–400
Rest of City	14,400
Total	52,300–52,600

Table 3 – Dublin City Council Capacity of Sub-areas of the City for Residential Development

In relation to the housing strategy for the city, there are several policies and objectives for the delivery of housing, however there are three core principles that inform and guide the overall core strategy which are as follows:

1. To ensure the provision of good quality housing across owner-occupied and rental housing tenures in sustainable communities,
2. To ensure the planning and building of housing and residential space in the city contributes to sustainable and balanced development, and
3. To ensure adequate provision of social rental housing for households unable to afford housing from their own resources.

It is submitted that the proposed development at Clongriffin is consistent with the housing strategy as it will assist in the delivery of housing, of a sustainable density, within the city, whilst providing a variety of unit types and mixed tenures for all, in a high-quality, vibrant community setting.

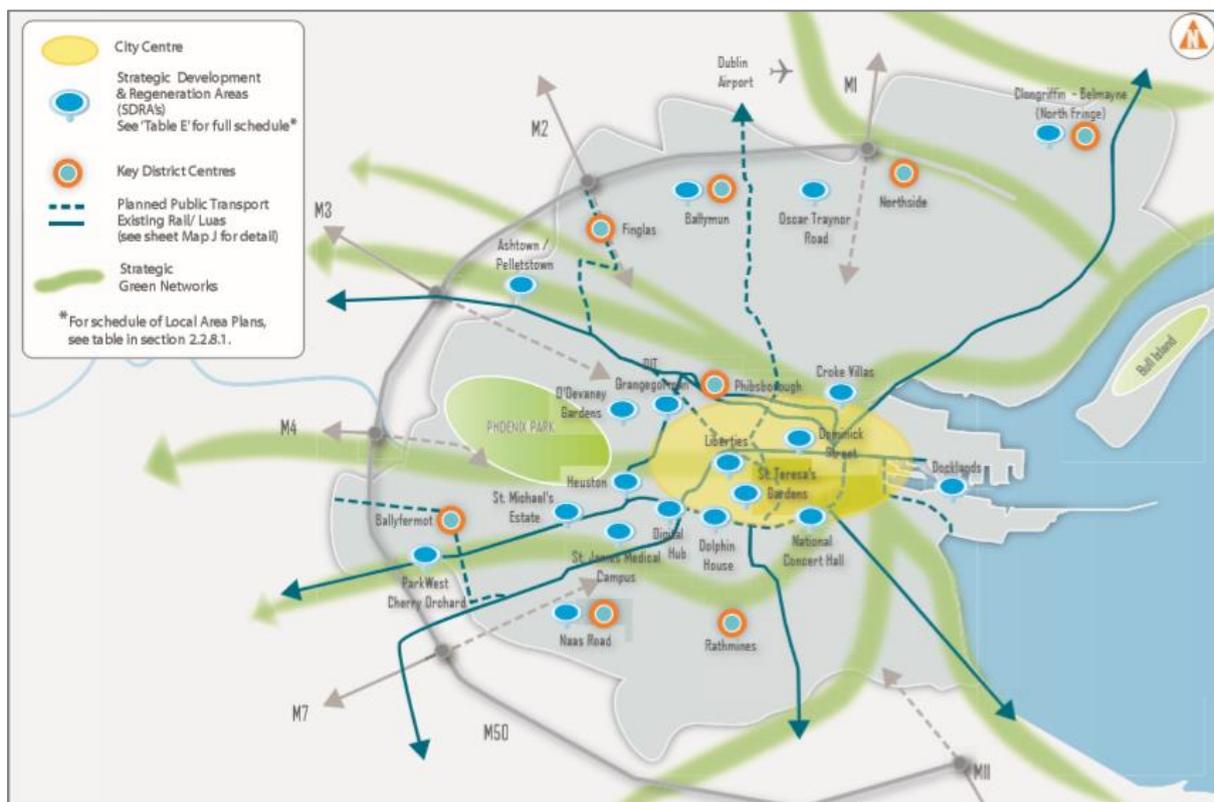


Fig. 1 – Dublin City Council Core Strategy Map

4.1.3 Quality Housing

In conjunction with the housing strategy, the quality housing chapter identifies the minimum standards required by Dublin City Council in relation to housing supply in the city area. At a general level, the development plan states *'the Department of Housing, Planning, Community and Local Government Planning Policy Statement 2015 encourages planning authorities to engage in active land management by leading and managing the development process and ensuring that land zoned for development actually comes into use in accordance with development plan policy and in tandem with supporting infrastructure'*.

It continues, *'building at higher densities makes more efficient use of land and energy resources, creating a consolidated urban form which fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure'*.

The proposed development at Clongriffin is consistent with these broad level policy objectives. The policy objectives include:

QH5: *To promote residential development addressing any shortfall in housing provision through active land management and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites.*

QH6: *To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.*

QH7: *To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.*

QH8: *To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.*

The Development Plan recognises the importance of building sustainable communities and on this basis, it is submitted that the proposed development at Clongriffin is consistent with these policies.

In relation to apartment living, the Development Plan states *'it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. Successful apartment living requires that the scheme must be designed as an integral part of the neighbourhood'*.

QH18: *To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.*

QH19: *To promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive, sustainable, mixed-income, mixed-use neighbourhoods supported by appropriate social and other infrastructure.*

QH20: *To ensure apartment developments on City Council sites are models of international best practice and deliver the highest quality energy efficient apartments with all the necessary infrastructure where a need is identified, to include community hubs, sports and recreational green open spaces and public parks and suitable shops contributing to the creation of attractive, sustainable, mixed-use and mixed-income neighbourhoods.*

4.1.4 Sustainable Neighbourhoods and Communities

In terms of sustainable communities and urban design in residential developments, the Development Plan states that:

A Good Urban Neighbourhood: *'The urban neighbourhood in Dublin should be big enough to support a range of services and small enough to foster a sense of belonging and community; it should be sufficiently dense to enable all of its essential facilities to be within easy walking distance of the urban centre'.*

Objectives include:

SN1: *To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this plan.*

SN2: *To promote neighbourhood developments which build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places.*

Neighbourhoods and Supporting Infrastructure: *'The importance of supporting infrastructure to underpin successful neighbourhoods and sustainable communities is now a long established and central tenet of government policy'. 'A range of community facilities and infrastructure will be essential to support the emergence of sustainable neighbourhoods and communities throughout the city, especially in newly emerging or developing areas'.* Development Plan policy objectives include:

SN5: *To ensure that applications for significant large new developments (over 50 units) are accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.*

SN6: *To support and encourage the future growth of a wide range of public, social and community services essential to local community life, and to promote and seek to provide multi-use, fit-for-purpose community facilities which are suitable for all ages and all abilities, are operated according to an effective and efficient management strategy, and which are accessible in terms of physical design, location, cost of use, and opening hours.*

It is submitted that the proposed development at Clongriffin is consistent with these policies and this is further detailed in the Sustainable Neighbourhoods Build to Rent Justification Report prepared by Downey Planning and Liv Consult which is enclosed with this application. A community and social infrastructure audit has also been prepared by Downey Planning and is submitted with this application. This audit provides detailed information and assessment on the existing infrastructure currently serving Clongriffin.

4.1.5 Movement and Transport

In relation to movement and transport, the Development Plan states that in order to maximise the use of public transport infrastructure and minimise car dependence, higher densities and interactive mixed uses will be encouraged within walking distance of public transport corridors and nodes (rail stations and interchanges) and at other key locations such as key district centres. Some of the policies and objectives in this regard include:

MT01: To encourage intensification and mixed-use development along existing and planned public transport corridors and at transport nodes where sufficient public transport capacity and accessibility exists to meet the sustainable transport requirements of the development, having regard to conservation policies set out elsewhere in this plan and the need to make best use of urban land. Dublin City Council will seek to prepare SDZs, LAPs or other plans for areas surrounding key transport nodes, where appropriate, in order to guide future sustainable development.

MT2: Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.

MT7: To improve the city's environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with green infrastructure objectives and on foot of (inter alia) the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.

MT12: To improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all.

MT13: To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.

MT17: To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.

MT18: To encourage new ways of addressing the parking needs of residents (such as car clubs) to reduce the requirement for car parking.

MT19: To safeguard the residential parking component in mixed-use developments.

MT20: To increase capacity of public transport, cycling and walking, where required, in order to achieve sustainable transportation policy objectives. Any works undertaken will include as an objective,

The Key District Centres relate to settlement centres where there is capacity for greater retail provision; where there is a significant quantum and intensity of population or the potential for new population emerging in developing areas; centres in proximity to quality public transport; and areas in need of comprehensive regeneration. In this regard, the Development Plan envisages Clongriffin/Belmayne to be *'a settlement of 4,000 residential units, with a population of around 8,000 serviced by a retail quantum of 40,000 sqm. This area already has a rail link and bus service. Extensive residential development is also planned on the lands adjoining, which are situated in Fingal County Council.'*

In relation to retail, the Development Plan specifically states that *'a robust retail strategy can be devised on the basis of a number of key principles to guide sustainable retail provision. These key principles consist of the following: the location and scale of retail provision to reflect the settlement hierarchy; the requirement for additional retail floorspace; application of the sequential approach to support existing centres; that new retail is of the right scale and that impact on neighbouring centres is minimal; the provision of locally accessible shopping to serve the needs of communities; the provision of higher order shopping within key centres that are easily accessible by high-quality public transport; and the need for consumer choice and affordability'*.

It goes on to state that *"retail provision has an important role to play in the creation of vibrant centres and sustainable neighbourhoods in both traditional urban villages and in the more recent developing areas such as the North Fringe, Pelletstown and Ballymun. This will become more important as the economic recovery strengthens and the city's population increases, requiring quality services at a local level in line with the core strategy. Dublin City Council will encourage appropriate retail provision throughout the city in accordance with the settlement and retail hierarchy as set out in the core strategy and retail strategy"*.

Policies and objectives include:

RD18: To ensure the adequate and appropriate retail provision in the emerging or key developing areas such as Cherry Orchard/ Parkwest, North Fringe, Pelletstown and the Docklands.

RD19: To promote the retail provision in the key district centres, district centres and neighbourhood centres, including the revitalisation of existing established centres (see Appendix 3 Retail Strategy).

Downey Planning are of the professional opinion that the c.22,727.5 sq.m. of retail/commercial floor space included as part of the overall proposed development subject to the concurrent applications, in conjunction with the c.13,950.m. already constructed in Clongriffin and the 8,786 sq.m. either under construction or to be implemented, provides for an overall total commercial development of 45,463.5 sq.m. which will be necessary to meet the needs of the population within the North Fringe and will assist in meeting the objectives set out within the Development Plan in relation to KDCs such as Clongriffin town centre. The overall permitted, constructed and under construction development at Clongriffin is set out in the Residential Development Schedule for Clongriffin Spreadsheet enclosed within this application.

Furthermore, Downey Planning have carried out a community and social infrastructure audit of Clongriffin and its environs including a review of Census population statistics. This audit assessed the proposed development and its uses in terms of the existing infrastructure within the area. In light of

this audit, it is submitted that the proposed development will build on existing attributes within the growing new community of Clongriffin, will integrate with and complete Clongriffin town centre, and will boost the area through the injection of a considerable residential population by developing 1,950 no. high-quality designed residential units with complementary, mixed lands uses. This ultimately will reinforce and establish Clongriffin town centre as a sustainable anchor for the surrounding suburbs.

For further information in this regard, please refer to the Community & Social Infrastructure Audit prepared by Downey Planning and the Clongriffin Masterplan prepared by CCK Architects.

4.1.7 Land Use Zoning

Under the current Dublin City Development Plan, the subject site is zoned as a Strategic Development and Regeneration Area' (SDRA) which seeks: "To seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and "Z6" would be the predominant uses". The lands at Clongriffin are also partially zoned as a 'Key District Centre' (KDC), Z4 pertains to this designation.

The proposed residential use and complementary land uses are permitted in principle. The proposed development will build on the existing attributes within Clongriffin, and will complete Clongriffin town centre through the introduction of 1,950 no. high-quality designed residential units across the masterplan development (1,030 units form part of this Clongriffin SHD 1 application) and mixed-uses such as crèche, cafés/restaurants, retail/commercial units, community centre, offices, etc. It is therefore considered that the proposed development is consistent with the objectives of the SDRA and Key District Centre zoning designations.

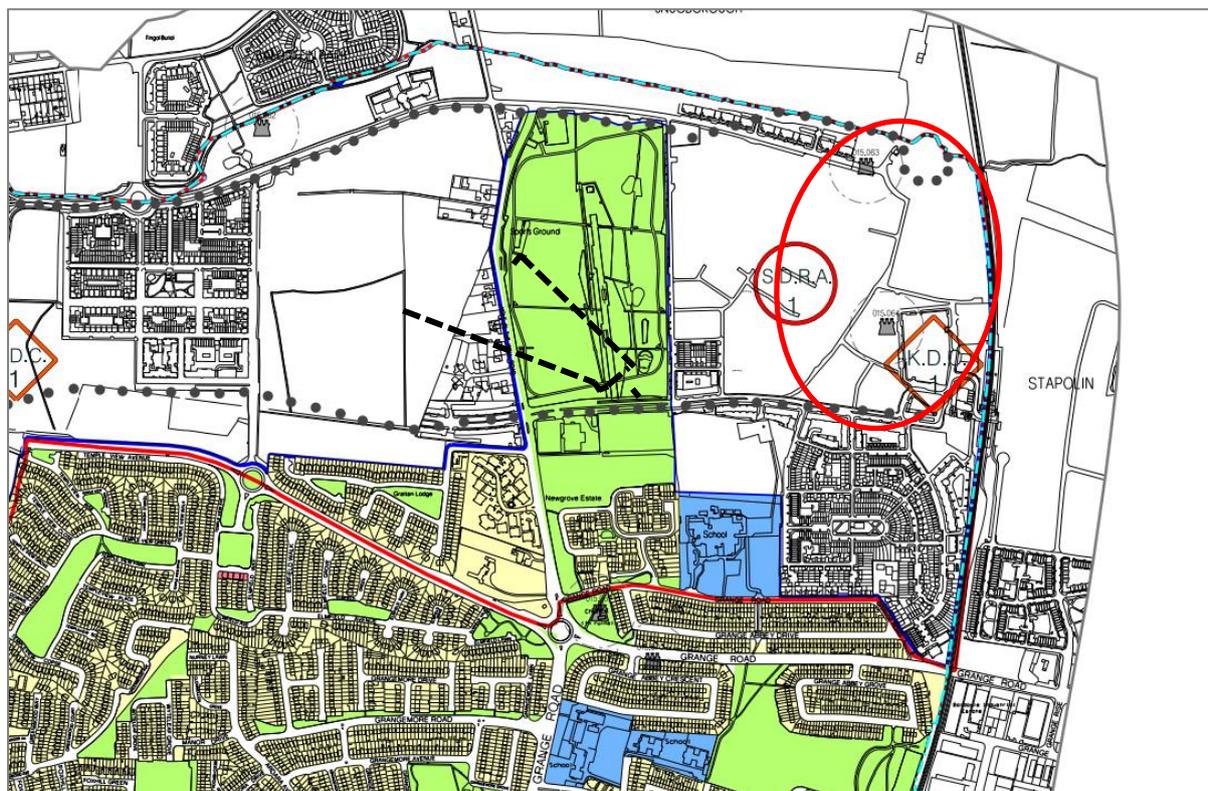


Fig. 3 – SDRA and KDC zoning (Masterplan lands in red)

The following relevant use classes are related to this zoning objective:

Zoning Objective Z4	Zoning Objective Z14
<p>Permissible Uses</p> <p>Amusement/leisure complex, bed and breakfast, betting office, buildings for the health, safety and welfare of the public; car park, car trading, childcare facility, civic offices, community facility, cultural/recreational building and uses, delicatessen¹, education, embassy office, enterprise centre, garden centre, guest house, halting site, home-based economic activity, hostel, hotel, industry (light), live work units, media-associated uses, medical and related consultants, motor sales showroom, office (max. 600 sq m.), off-licence, open space, park and ride facility, part off-licence, petrol station, place of public worship, public house, residential, restaurant, science and technology-based industry, shop (district), shop (neighbourhood), take-away, training centre.</p>	<p>Permissible Uses</p> <p>Betting office, buildings for the health, safety and welfare of the public; childcare facility, community facility, conference centre, cultural/recreational building and uses, education, embassy office, embassy residential, enterprise centre, green/clean industries, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, offices, open space, park and ride facility, part off-licence, place of public worship, public service installation, residential, restaurant, science and technology-based industry, shop (neighbourhood), training centre.</p>
<p>Open for Consideration Uses</p> <p>Advertisement and advertising structures, civic and amenity/recycling centre, conference centre, embassy residential, factory shop, financial institution, funeral home, garage (motor repair/service), household fuel depot, internet café, nightclub, office (max. 1200 sq m) outdoor poster advertising, shop (major comparison), warehousing (retail/non-food)/retail park.</p>	<p>Open for Consideration Uses</p> <p>Advertisement and advertising structures, bed and breakfast, car park, car trading, civic and amenity/recycling centre, factory shop, financial institution, funeral home, garage (motor repair/service), garden centre, golf course and clubhouse, hostel, internet café, nightclub, off-licence, outdoor poster advertising, petrol station, pigeon lofts, public house, take-away, veterinary surgery, warehousing (retail/non-food)/retail park, warehousing.</p>

Fig. 4– Permissible Uses under Zoning Designations Z4 and Z14

4.1.8 Strategic Development and Regeneration Areas (SDRA)

The proposed development is located in an area designated SDRA1 North Fringe (Clongriffin-Belmayne). The Development Plan states that *“the north fringe action area plan was first produced for the North Fringe lands in 2000, setting out the objective to extend the metropolitan core and create a new dynamic mixed-use urban quarter. With a strong urban design framework in place, much has already been achieved including the development of over 3,400 new homes and 41,000 sq. m of commercial floor space. In addition, key water and drainage infrastructure, a new railway station and public square, sections of the new main boulevard and the much-acclaimed Father Collins Park are all in place”*.

While the original plan was intended to be a long-term plan for the area, the slowdown in the construction sector from 2008 meant that many key sites remained undeveloped. This application for development, as part of the delivery of the wider Masterplan, will assist in completing Clongriffin town centre.

A statutory local area plan was subsequently produced for the area and adopted by the City Council in December 2012. It sets out a detailed framework and phasing mechanism for the development of the remaining key sites, with the aim of providing approximately 8,000 new homes upon completion. The local area plan is based on the following key objectives/guiding principles:

“1. To create a highly sustainable, mixed use urban district, based around high quality public transport nodes, with a strong sense of place.

2. *To achieve a sufficient density of development to sustain efficient public transport networks and a viable mix of uses and community facilities.*
3. *To establish a coherent urban structure, based on urban design principles, as a focus for a new community and its integration with the established community”.*

It is submitted that the proposed development complies with the aforementioned objectives as set out in the Local Area Plan. The LAP is further assessed in Section 4.2 below.

4.1.9 Development Standards

Chapter 16 of the Dublin City Development Plan sets out development standards and criteria that from the policies and objectives of the City Development Plan to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

Large-Scale Development

In terms of large-scale development, Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale development:

- To create new compositions and points of interest;
- To provide high-quality new streets, squares and open spaces, where appropriate, linked to the surrounding street pattern, to maximise accessibility;
- To provide an appropriate mix of uses comprising retail, residential, entertainment, recreational, cultural, community- and/or employment generating uses; particular emphasis should be given to new and complementary uses and facilities that expand and improve the existing range of uses and facilities in the area;
- To carefully integrate appropriate planting and trees;
- To take into account existing and likely future patterns of traffic and pedestrian movement, including pedestrian desire lines;
- To retain existing and create new features to make an easily understandable urban environment, including active building frontages with clearly defined edges and safe public routes;
- To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks;
- Ensure waste storage facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.

The design team has given due consideration to the aforementioned items which has resulted in the incorporation as part of the scheme. This is fully detailed within the Architectural Design Statements, the Clongriffin Masterplan for the lands, and the Landscape Masterplan prepared for the development. It is therefore submitted that the proposed development is consistent with the Development Plan in this regard.

Landscaping/Open Space

Landscape design and maintenance plans will be regarded as an integral part of all development applications. Hard landscaping, materials and finishes, soft landscaping, boundary treatments, street furniture, trees, public realm, green networks, etc. all play an integral role in the creation of a strong sense of place within an urban environment. Clongriffin will be an attractive, vibrant urban centre for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities such as Fr. Collins Park, Mayne River Linear Park, Market Street green route and the various pocket parks within the overall scheme.

Clongriffin is well served by public open space with Father Collins Park providing a public park comprising 26 hectares. Notwithstanding this, the overall Clongriffin Masterplan lands provides for 53,962 sq.m. of public open space (which exceeds the 10% requirement for the overall 53.56 hectares of land).

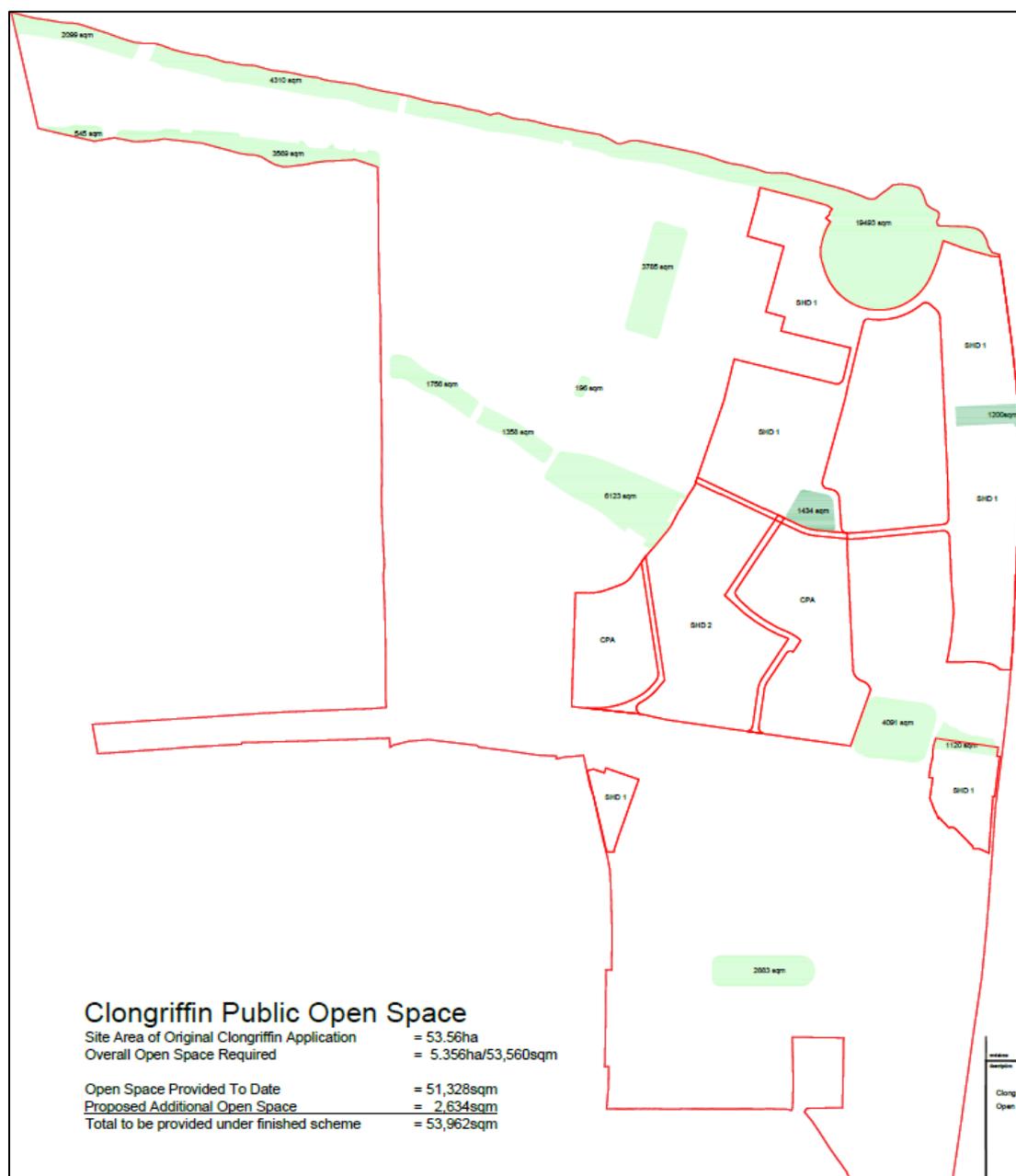


Fig. 5 – Public Open Space at Clongriffin (Existing, Under Construction and Proposed)

Apartment schemes must provide for communal open space. *Communal open space is a critical environmental resource as a 'breathing space' and for meeting the amenity needs of residents. It may be in the form of accessible sheltered roof gardens, communal landscaped areas at ground level or at podium level where commercial or retail uses occupy the ground floor. Whilst private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and/or 'privacy strip' between the two."*

In addition to the public open space within Clongriffin, communal open space has been provided throughout the scheme for the enjoyment of residents. Such spaces include several roof gardens and designated communal landscaped garden areas for each building. The proposed amenity spaces also benefit from passive surveillance from the proposed residential units.

In terms of private open space, the Development Plan states that: *"private open space shall be provided in the form of gardens or patios/ terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security. Where balconies or terraces are provided, they should be functional, screened with opaque material, have a sunny aspect, and allow all occupants to sit outside, including wheelchair users. They should also minimise overshadowing and overlooking. The primary balcony should be located adjacent to the main living areas to extend the apartments' living space. The minimum depth of private amenity open space (balcony or patio) shall be 1.5 m and the minimum size shall be as follows: Studio unit: 4 sq. m.; 1-bedroom unit: 5 sq.m; 2-bedroom unit: 7 sq.m.; 3-bedroom unit: 9 sq.m".*

In general, each apartment unit has been provided with adequately sized balconies or patios/terraces which have been designed in accordance with quantitative and qualitative standards. Those units at ground floor level have been provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction between spaces. Please refer to the enclosed schedule of accommodations prepared by CCK Architects and Wilson Architects which sets out the private and communal open space provided within each block.

The proposed development will be fitted with CCTV systems for the security and safety of residents whilst also ensuring residential amenity is protected. Appropriate separation distances have been provided between apartment buildings to ensure privacy without compromising internal residential amenity of the apartments.

Overall, it is submitted that the Landscape Masterplan prepared for Clongriffin, in conjunction with the detailed plans for individual buildings in terms of communal and private open space, is consistent with all of the standards and aspirations of the Development Plan regarding landscaping and open space. For further information in this regard, please refer to the enclosed landscaping masterplan and associated detailed proposals prepared by Ronan MacDiarmada & Associates.

Density and Building Heights

In terms of density, the Development Plan states that *"Sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and*

seek to protect existing and future residential amenity. Public transport capacity will also be used to determine the appropriate density allowable”.

“All proposals for higher densities must demonstrate how the proposal contributes to place-making and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods”.

“Planning applications will be assessed against the building heights and development principles established in a relevant LAP/SDZ/SDRA. Proposals for high buildings should be in accordance with the provisions of the relevant LAP/SDZ/SDRA in addition to the assessment criteria for high buildings and development plan standards”.

In this regard, the proposed development promotes higher density development that is immediately adjacent to a DART station/QBC. The proposed development subject to this application SHD 1 provides for a high-density development of 1,030 no. units which provides for a density of 163 units per hectare. The overall density of development subject to the concurrent applications (i.e. 1,950 units on the masterplan site area of c.11.4 ha) provides for a density of 171 units per hectare. The overall density across the entire Clongriffin Area including the constructed, permitted and proposed units provides for 84 units per hectare (4,518 units on an overall site area of 53.56 hectares when the 3 no. sites outside the ownership of the applicant are included) or 79 units per hectare (4,220 units on an overall site area of 53.56 hectares when the 3 no. sites outside the ownership of the applicant are excluded). The proposed density is in excess of the recommended minimum of 50 units per hectare as advised under Section 28 Ministerial Guidelines. The subject site is located on a high-quality transport route and is located in an existing centre within an urban context and therefore has the capacity to achieve higher densities. The proposed density is therefore considered appropriate due to the site’s location adjoining high-quality transport corridors.

The proposed development is also consistent with the aforementioned policies and objectives pertaining to building height. The proposed development ranges in height from 3 storeys to 17 storeys over basement and is respectful of the surrounding established context. It is also considered that the subject site represents a strategic location to develop high quality residential units well serviced by efficient and frequent public transport. For further information in relation to the justification of the proposed building height (in particular Blocks 17 and 26), please refer to the Material Contravention Statement prepared by Downey Planning.

Making Sustainable Neighbourhoods/Mixed-Use Development

In relation to creating sustainable neighbourhoods, the Development Plan states the following: *“new neighbourhood developments should harmonise with the local character and further develop the unique character of these places, and should also make a contribution to social infrastructure to enable the creation of sustainable neighbourhoods”.*

“Proposals should have regard to the DEHLG’s Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual 2009, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DECLG’s Design Manual for Urban Streets and Roads (DMURS), 2013 in the making of sustainable neighbourhoods, as well as the principles and key

characteristics of a good neighbourhood, as set out in the chapter on Sustainable Communities and Neighbourhoods”.

Mixed-Use Development: “To create a vibrant city, it is important that development accommodates a mix of uses. In considering proposals for mixed-use developments, the protection of amenity and the reduction in potential conflict between the various uses will be of paramount importance. Factors such as levels of noise and air pollution and security will be considered. Where these factors would affect amenities, all proposals must include measures to reduce noise levels between the different uses to ambient noise levels and enhance security”.

It is submitted that the proposed development will build on existing attributes within the growing community of Clongriffin, will integrate with and complete Clongriffin town centre, and will boost the area through the introduction of a considerable residential population by developing 1,950 no. high-quality designed residential units with complementary, mixed lands uses. This ultimately will reinforce and establish Clongriffin town centre as a sustainable anchor for the surrounding suburbs.

The proposed development promotes higher density development that is immediately adjacent to a DART station/QBC. The subject site is located on a high-quality transport route and is located in an existing centre within an urban context (close to M50/M1) and therefore has the capacity to achieve higher densities. The proposed density of c.171 units per hectare across the 15 no. blocks is therefore considered appropriate due to the site’s location adjoining a high-quality transport corridor. The proposed development ranges in height from 3 storeys to 17 storeys and has been designed to respect the surrounding established context. For further information in relation to the justification of the proposed building height (in particular Blocks 17 and 26), please refer to the Material Contravention Statement prepared by Downey Planning.

The delivery of 1,030 no. units in this application as part of the wider delivery of 1,950 no. units will support residential consolidation and sustainable intensification at Clongriffin, to support ongoing viability of social and physical infrastructure and services within the area and meet the future housing needs of Dublin. It is therefore considered that the proposed development is consistent with the policies and objectives of the Development Plan in this regard.

4.2 Clongriffin-Belmayne Local Area Plan 2012-2018

The Clongriffin-Belmayne Local Area Plan 2012-2018 (LAP) extended until 2022 “*provides a framework for proper planning and sustainable development of Clongriffin-Belmayne (the North Fringe) area in accordance with the policies and objectives of the Dublin City Development Plan*”. The lands around the North Fringe area were first proposed for development in 1999/2000 with the publication of an action plan to guide the development. “*The two main objectives of the plan have been to provide a coherent urban structure with distinct identity and to integrate new and existing communities successfully*”.

The LAP discusses how the proposed development of the North Fringe has progressed since the publication of the area action plan in 1999/2000. The LAP recognises that the North-Fringe is a growing area and that considerable progress has been made on the provision of infrastructure in the area. This includes:

- The completion of c.3,400 homes to date;

- The provision of c.41,000 sq.m. of commercial space;
- The construction of the Clongriffin DART station and the No. 15 Bus service, which uses the Malahide QBC and terminates in Clongriffin;
- Sewer and watermain services;
- Main street and distributor road networks;
- The construction of two primary schools;
- The completion of Fr. Collins Park; and,
- The completion of the park and ride facility and town centre plaza.

The LAP is designed to provide a strategy on how best to develop the area “*in line with best practice in sustainable urban planning to meet the needs of all existing and future residents*”. Regarding the zoning on the site, “*the LAP is focused on the area zoned Z14 under the Dublin City Development Plan which is “to seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and “Z6” (enterprise and employment) would be the predominant uses*”. Downey Planning are of the considered opinion that the proposed development will meet the zoning requirements of the LAP and that it will meet the standards as set out in the LAP.

The LAP Strategy Section B outlines specific objectives regarding key elements of the SDRA1 site; the following sections will identify these key policy objectives and will demonstrate how the proposed development is consistent with these objectives.

4.2.1 Movement and Transport

The Movement and Transport section begins with the statement:

“to promote eases of movement within and access to the area by incorporating a high quality, integrated transport network through improvements to the existing road, rail and public transport network, together with improved cycling and pedestrian facilities within the local area”.

Some of the key objectives from the Movement and Transport section include:

Objective - MT02

“To provide new patterns of pedestrian and cycle movement in both the east-west and north-south directions throughout the area that is coherent, direct, safe and convenient”.

Objective - MT04

“To facilitate enhanced patronage and efficient utilisation of public transport and promote walking and cycling, through a range of means including a reduced provision of car parking for commercial development”.

Objective - MT05

“To liaise with Irish Rail and promote greater frequency and enhanced services at Clongriffin Rail Station for commuters as the area continues to grow”.

Objective - MT07

“To develop a pedestrian route along the River Mayne and access to potential to connect with amenity lands in Baldoyle Estuary and further amenities along coastal routes”.

Objective - MT08

“To seek well integrated design solutions for adequate car parking within the design and layout of schemes with particular attention to visitor parking and car storage”.

Objective - MT10

“That the design of all streets fully comply with the design standards and requirements of the Roads and Traffic Department of Dublin City Council to facilitate the orderly taking in charge process for all public roads. Requirements of Dublin City Council for street design including public lighting, traffic and pedestrian control signalling, street signage and traffic calming shall be ascertained at the design stages and completed if requested before taking in charge”.

Objective - MT12

“To liaise with Dublin Bus and the NTA on the operation of bus services and alignment of bus routes through the area having regard to the location of new housing, community facilities and other services and new street completions (offering the potential for new route options) as they occur in the LAP area”.

Clongriffin town is well served by public transport, namely the DART at Clongriffin Station and the Malahide QBC which services Station Square. The proposed Bus Connects route is also due in the near future as the project is on public display. It is a walkable town with many amenities in close proximity to the residential units. Priority to pedestrian and cycle movements have been integral to the overall design and masterplanning of the subject lands. The proposed development complies with DMURS, has an adequate quantum of car parking and bicycle parking proposed, and additional GoCar facilities on site will also be provided which will further support the use of sustainable transport. In light of the above, it is submitted that the proposed development is consistent with the movement and transport objectives of the Local Area Plan.

4.2.2 Urban Design

The Urban Design section begins with the statement:

“That the principles of urban design will drive future development in the North Fringe to achieve a high-quality urban environment creating a neighbourhood where people will want to live, work and visit, now and in the future”.

Some of the key objectives from the Urban Design section include:

Objective - UD01

“To achieve high quality and sustainable densities to consolidate the area, maximise access for residents and employees to public transport and successfully define important locations and routes including the MainStreet access and town centres (KDC designated zones)”.

Objective - UD02

“To promote the development of family orientated, high quality, adaptable, life long homes within the LAP area through creative design that still delivers a sustainable density to support the provision of services”.

Objective - UD03

“To promote public spaces that provide both passive and active recreation and a connection to those forms of activities in the surrounding area”.

Objective - UD04

“To ensure high quality streetscapes are achieved through distinctive high quality street furniture, lighting, paving and public artwork that creates a distinctive character associated with the North Fringe”.

Objective - UD05

“To design park spaces and all open spaces linkages to be part of the larger green network in particular from Father Collins Park to the surrounding area and along the River Mayne incorporating a dedicate network of cycle paths and pedestrian routes”.

Objective - UD06

“To achieve creative and unique character through public realm enhancements in all key development sites through development contribution levies and partnership with the divisions of Dublin City Council”.

Objective - UD07

“The height strategy for the LAP will seek positive integration of new building height with established character. Locations identified for special height character are the designated Key District Centres (in general 5 storeys minimum) and the Main Street Boulevard axis (in general four to five storeys). Heights of 2-6 storeys (including a set back at the top floor of a 5/6 storey building) may be facilitated subject to quality design criteria and set back requirements along the river corridor to complete the urban form of pavilion buildings to complete Marrsfield. One location for a landmark profiled building (10-14 storey office height equivalent) is designed adjacent to Clongriffin train station. In other locations, where 4 storeys residential height is proposed, some flexibility will be allowed on height equivalent (13m) to achieve design improvements to the façade”.

Further consideration will be given to height in section 4.2.7.

Objective – UD09

“To seek and assess the satisfactory arrangements for the future management of multiple unit developments as an integral part of a scheme planning proposal to ensure that residential amenities are protected in the management of completed developments in accordance with city policy of encouraging lifetime homes.”

Objective – UD10

“To minimise the adverse impacts of noise and promote good health and a good quality of life through the effective management of noise within the Clongriffin Belmayne Local Plan Area”.

Objective - UD11

“To preserve and maintain good air quality in the plan area in accordance with national and EU policy directives on air quality and where appropriate promote compliance with established targets”.

The masterplan produced to guide development at Clongriffin is consistent with the aforementioned urban design objectives and was produced by Gerard Gannon Properties and CCK Architects in collaboration with Dublin City Council. The masterplan aims to achieve the highest quality of residential and mixed-uses development which meets the needs of residents and visitors to Clongriffin. For further information in this regard, please refer to the Architectural Design Statements and Masterplan document which are enclosed as part of this application.

4.2.3 Economic Development Strategy

The Economic Development Strategy begins with the statement:

“This LAP seeks to emphasise the positive future prospects for this area and sets out a proposal for achievable gains in the short term that improve conditions to encourage long term investment, business opportunities and job growth in the local area”.

Some of the key policies and objectives from the Economic Development Strategy include-

Interim economic strategy policies and objectives:

Policy - ESP1

“For the interim economic strategy, it is a policy of this LAP to promote catalyst for economic activity that include short term uses”.

Objective - ESO1

“To improve the physical and visual environment of the LAP area, in particular where vacant sites exist, to provide positive first impressions that market the area for business investment”.

Long term economic strategy and policies and objectives:

Policy - ESP2

“For the long term economic strategy, it is a policy of the LAP to promote progress in delivering key drivers for sustainable economic growth including successful movement, high quality urban design, high quality visual impact, high quality natural environment, access to high quality life long housing and access to social community infrastructure”.

Objective - ESO8

“To co-ordinate with stakeholders to help achieve delivery of key transportation infrastructure improvement serving the LAP area”.

Objective - ESO10

“To complete the urban design and spatial vision for the developed area (originally set out in the Action Plan in 2000) including the long term completion of two gateway town centre locations, which will be attractive for enterprise and business opportunities”.

The proposed development at Clongriffin provides for a considerable quantum of commercial floor area in the region of c.22,727.5 sq.m. This commercial space, combined with existing commercial space already constructed and permitted commercial space provides for an overall total of 45,463.5 sq.m. of commercial development, which has the potential to offer substantial employment opportunities to the community of Clongriffin such that it will be possible to live and work in the town. The proposed development as part of these applications also provides for 1,950 residential units which will provide an injection of population to the area such as to sustain existing social and community infrastructure and to provide a consumer base for the commercial development. In light of the above, it is submitted that the proposed development is consistent with the objectives of the Local Area Plan in this regard.

4.2.4 Environment and Open Space Amenity Strategy

The Environment and Open Space Amenity Strategy section begins with the statement:

“The Environment and Open Space Amenity Strategy will focus on integrating a network of natural habitat locations, high quality parkland, sport and recreation areas, private and communal open spaces successfully with development areas. It will promote the development of a series of recreational routes that will connect established and new communities together”.

Some of the key policies and objectives of the Environment and Open Space Amenity Strategy include:

Policy - EOSP1

“To realise the potential of a high-quality environment as a key driver in economic development, community development, bio diversity enhancement, improved sustainable movement and enhanced quality of life for the local area”.

Policy – EOSP2

“To protect and maximise the assets of natural heritage both within and adjoining the local area, in particular coastal amenities, and promote the development of green corridors between amenity areas in both Dublin City Council and Fingal County Council areas.”

Policy – EOSP3

To protect the natural habitats and protected status of Baldoyle Estuary by ensuring protection of water quality and habitats along the riparian corridor of the River Mayne and ensure

appropriate set back of developments, surface water management and park design along its course.

Objective – EOSO1

“To achieve best practice and innovations in SuDS design as part of development schemes including the successful co-ordination of surface water management with ecology and amenity functions of open space and landscaped areas. An attenuation pond and wetland park is currently under construction at Marrsfield Avenue”.

Objective – EOSO3

“To co-ordinate with Fingal County Council and other stakeholders on the completion of a phased plan and delivery of a linear park along the course of the River Mayne and enhancement of the biodiversity value of the riparian corridor.”

Objective – EOSO4

“To promote connections between existing amenity areas in the LAP proposed amenity areas and greenways including potential connections to an extended S2S route”.

Clongriffin is unique in that much of the social and physical infrastructure is already in place, including the highly commended Fr. Collins Park. The park comprises 26 hectares of open space consisting of playing pitches, skateparks, water features, running/walking/cycling tracks and children’s playgrounds. The proposed development plans to create clear pedestrian and cycling links from Station Square, along Market Street and right through to Fr. Collins Park. Ultimately, Clongriffin will be an attractive, vibrant urban centre for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities such as Mayne River Linear Park and the various pocket parks within the overall scheme. For further information on these proposals, please refer to the Masterplan prepared by CCK Architects and the Landscape Masterplan and detailed proposals for each block prepared by Ronan MacDiarmada Landscape Architects. In light of the above, it is submitted that the proposed development is consistent with the objectives of the Local Area Plan in this regard.

4.2.5 Community and Social Infrastructure Policy

The Community and Social infrastructure section begin with the statement:

“Taking into account methods that have worked in the past and identifying the opportunities for enhancement of the community in the future Dublin City Council seek to create neighbourhood revitalisation, and promote principles of active citizenship and civic responsibility in the new and innovative ways. New developments should contribute to sustainable communities through the provision of sustainable social infrastructure that will ensure optimum use of community facilities”.

Some of the key objectives from the Community and Social Infrastructure section include:

Objective - CS01

“To promote well designed, accessible and sustainable urban neighbourhoods throughout the LAP area that are well served by local facilities and public transport”.

Objective - CS02

“To ensure access for all to community and social infrastructure for community integration”.

Objective – CS03

“To ensure that buildings intended for community related facilities are designed as adaptable flexible spaces that accommodate a range of uses”.

Objective – CS06

“To seek to create safe and useable open spaces with each residential development for play through overlooking and passive surveillance”.

Objective – CS07

“To make provision for the completion of key routes and access points for all to the permanent primary schools site within LAP lands”.

Objective – CS08

“To promote and encourage a socially inclusive community that cater for all age groups, that accord with the principles of universal design and that offer quality of opportunity and good services to all”.

Objective – CS010

“To encourage the provision of accessible sports, recreation and community facilities as part of a sustainable mix of uses for future development proposals within the LAP area”.

Objective - CS011

“To facilitate the development of two co-located primary schools in Belmayne, facilitate ease of access and connectivity to the school location and to reserve specially designated sites, of appropriate size and configuration to fulfil both the school’s space requirements and integrate successfully with adjoining development, for educational uses to service the future population of the LAP area”.

Much of the social infrastructure is already in place and Gerard Gannon Properties are actively involved in the community of Clongriffin. The proposed development will contribute positively to the existing community provisions at Clongriffin and will benefit existing and future residents. Community and social infrastructure are a strong focus of the masterplan. Consistency with the objectives of the Local Area Plan in this regard has been demonstrated throughout this Statement, and in the

supporting documentation including the Social and Community Infrastructure Audit Report, the Planning Report and the Masterplan for the lands.

4.2.6 Infrastructure and Services Strategy

The Infrastructure and Services Strategy section begins with the statement:

“To deliver the necessary infrastructure to ensure adequate capacity to accommodate the quantum of development envisaged by the local area plan, and to ensure that the delivery of this infrastructure enhances the quality of the areas environment and facilitates the sustainable economic growth and co-ordinates development of the North Fringe”.

Some of the key policies and objectives from the infrastructure and Services Strategy include:

Policy – ISP1

“It is the policy of the council that infrastructure delivery shall facilitate and enhance the redevelopment of the key North Fringe LAP area to achieve its potential as a key Developing Area of the City, as identified in the Dublin City Development Plan”.

Policy – ISP3

“To ensure that development is permitted in tandem with available water supply and only where network capacity is available. New development must include details on water conservation measures and demand management measures”.

Objective – ISO1

“To protect existing and future infrastructure through the protection of wayleaves and co-ordination of developments with the requirements of infrastructure service providers”.

Objective – ISO3

“To seek the achievement of good water quality in line with the Water Framework Directive requirements and the Eastern River Basin District Management Plan for all water courses in the LAP area including the River Mayne”.

Objective – ISO6

“To require all proposed developments to carry out a detailed Flood Risk Assessment in accordance with the Departmental Guidelines on Flood Risk Management.”

Objective – ISO7

“All new developments shall be required to comply with the standards set out in the Greater Dublin Strategic Drainage Study (GSDSDS).”

Clongriffin is unique in that approximately 80% of the required infrastructure (roads, drainage, service, and landscaping) is already in place. The overall proposed development totalling 1,950 units and c.22,727.5 sq.m. of commercial space will build on this existing infrastructure and utilise the key public transport services and open space available within the masterplan area. The proposed development

is an infrastructure led development with many of the key social and physical infrastructure elements already provided in the area. Waterman Moylan Consulting Engineers have prepared detailed drawings and documentation which demonstrate consistency with the aforementioned objectives. For further information in this regard, please refer to the enclosed engineering drawings and documentation submitted as part of this submission.

4.2.7 Sustainability Strategy

The sustainability Strategy section begins with the statement:

“Developing the LAP area in a sustainable way will help to provide opportunities for citizens to live and work close to the city centre, close to suburban communities they may have grown up in and close to the natural amenities of the coast and north County Dublin. The opportunity is presented by the LAP is to consolidate the city and prevent sprawl and encroachment into further green field areas”.

Some of the key policies and objectives of the Sustainability Strategy include:

Policy - SSP1

“To support sustainable design and sustainable formats of development in the LAP area which will help Dublin City Council achieve its targets in reducing energy consumption and reducing carbon dioxide emissions in accordance with the Dublin City Energy Action Plan”.

Objective - SSO1

“To seek best practice in sustainable design and incorporation of green technology for all future development proposal in the LAP area across the levels of the individual buildings, the overall scheme and overall neighbourhood”.

Objective – SS02

“To encourage the development of exemplary projects within the LAP area that demonstrate best practice in energy efficiency (both residential and commercial) and sustainable design”.

Objective - SS03

“To prioritise actions under the LAP through an effective phasing programme that help to complete the development of sustainable walkable neighbourhoods with particular emphasis on, promotion of public transport, promotion of sustainable movement, promotion of consolidating areas of development with sustainable densities and enhancement of the environment and open space”.

Objective – SS04

“To facilitate the provision of employment uses in close proximity to residential areas to increase the opportunity for working close to the home (and thereby reducing the extent of work-related commuter journeys)”.

The proposed development at Clongriffin is consistent with the proper planning and sustainable development of the area. The development comprises a high quality mixed residential and commercial

development well serviced by public transport, with frequent bus and rail services to and from Dublin City Centre. The commercial space will offer employment opportunities to residents and the community and opens space provisions will ensure a high-quality standard of living for residents and for visitors to the area. This ultimately will reinforce and establish Clongriffin town centre as a sustainable neighbourhood and one which will act as an anchor for the surrounding suburbs. Consistency with the objectives of the Local Area Plan in this regard has been demonstrated throughout this Statement, and in the supporting documentation including the Social and Community Infrastructure Audit Report, the Planning Report and the Masterplan for the lands.

4.2.8 Density

In relation to density, the LAP states:

“The LAP proposes a design-led approach to density, to achieve the optimum use of land resources and investment in infrastructure. Density is expressed in units per hectare (uph) and density standards are indicative. Clongriffin-Belmayne (North Fringe) LAP is located within a public transport corridor and based on the guidelines published by Department of Environment, Heritage and local Government on Sustainable Residential Development in Urban Areas a general minimum standards of 50 units per hectare should be achieved subject to appropriate design and amenity standards in the LAP area”.

“In areas outside the immediate 500 metre catchment of existing and future proposed public transport but still within a 1km catchment of a rail station, sustainable higher densities for high quality lifetime housing with associated community uses will be sought (general densities of 50 units per ha)”.

“In areas outside the 1km catchment of the rail station, high quality family housing areas with associated community uses will be required at sustainable densities that achieve general target densities of 40-50 units per ha with some flexibility for schemes achieving 35-50 units per ha if the site location context in the LAP is considered appropriate, urban design criteria for the successful frontage onto streets and public open space is achieved, high standards of quality design are achieved and a quality mix of housing typology to include own door family housing is included”.

Overall, it is clear that it is National Policy to promote and encourage increased densities in excess of 50 units per hectare on zoned lands adjacent to public transport corridors. In order to achieve this density in a sustainable manner, the requirement for increased building heights must be explored in appropriate locations to prevent urban sprawl and thus promote a compact urban form. In the case of this development, the proposed overall density of development subject to the concurrent applications (i.e. 1,950 units on the masterplan site area of 11.4 ha) provides for a density of 171 units per hectare. The overall density across the entire Clongriffin Area including the constructed, permitted and proposed units provides for 84 units per hectare (4,518 units on an overall site area of 53.56 hectares when the 3 no. sites outside the ownership of the applicant are included) or 79 units per hectare (4,220 units on an overall site area of 53.56 hectares when the 3 no. sites outside the ownership of the applicant are excluded).

This can only be achieved through the provision of increased building heights, including 2 no. taller, landmark buildings also being proposed (i.e. Blocks 17 and 26). It must be noted that the wider

Clongriffin area achieves a density of c.84 units per hectare or 79 units per hectare (as set out above), having cognisance of the objectives within the Local Area Plan and ensuring a quality mix of housing typology, quality open space and overall legibility. It is therefore considered that the proposed development is consistent with the vision, strategy and objectives outlined within the Local Area Plan.

4.2.9 Height

In relation to taller buildings, the LAP states:

“The LAP will seek to protect the urban structure and landscape character of the North Fringe while encouraging well located new developments and higher densities, including where suitable, appropriately sited and designed taller buildings. The two designated KDC locations, as gateway locations with town centre functions are the most appropriate locations for higher profile buildings”.

“In recognition of this character, the LAP identifies three areas for potential future height, which are the Key District Centre's at Clongriffin rail station and the R139/Malahide Road Junction and the axis of the Main Street Boulevard connecting the two. These locations have been identified based on the understanding of the existing urban structure of North Fringe and the vision to create a compact and sustainable urban neighbourhood”.

“The LAP will seek provision of a landmark structure of 10-14 storeys (office height) corresponding with the location adjacent to the rail station previously approved for a landmark building”.

“Proposals for buildings with height will be assessed against the policy of the Dublin City Development Plan. A tall building is defined as any building that is significantly taller than the prevailing height. A significant increase in building height may be accepted where it can be demonstrated that there is a strong urban design rationale for doing so, and where specific social, economic or architectural gains will be delivered by increasing height above the established height. All proposals for tall buildings must have regard to the criteria set out in section 17.6.3 of Dublin City Development Plan 2011-2017”.

The proposed development is generally consistent with the policies and objectives pertaining to building height within the Local Area Plan and City Development Plan. However, Blocks 17 and 26 provide for taller, landmark buildings at strategic locations within Clongriffin, such as along the rail line, which warrant increased heights. It is submitted that the proposed design of Blocks 17 and 26 adheres to the assessment criteria for mid- taller buildings. The proposals will create taller, landmark buildings at key node locations within Clongriffin, which are of excellent architectural design, and will ultimately add to the overall character and sense of place within this urban centre. Justification for such heights is fully detailed within the accompanying Planning Report and Material Contravention Statement, both of which have been prepared by Downey Planning.

4.2.10 Phasing and Implementation

The Clongriffin-Belmayne Local Area Plan also outlines a phasing and implementation strategy for the Clongriffin Strategic Development and Regeneration Area (SDRA). In this regard, it is noted that a considerable percentage of Clongriffin has already been constructed to date and/or is currently under construction. The proposed development subject to the current applications represents some of the

last remaining infill, development sites within Clongriffin town centre. The indicative phasing plan intended for the delivery of this proposed development, whilst giving due consideration to the strategy contained within the Local Area Plan, is being proposed in light of current on-site construction activity and status of infrastructure whilst also ensuring the streamlined and timely delivery of the scheme including social housing development, community facilities and open space provision. For further information in this regard, please refer to the indicative phasing plan which has been prepared by CCK Architects, in consultation with the overall design team and indeed Gerard Gannon Properties. The proposed indicative c phasing plan is enclosed for the consideration of An Bord Pleanála.

4.2.11 Retail

In relation to retail, the LAP cites a number of objectives from the *Retail Strategy for the Greater Dublin Area 2008-2016*; this is done “to set out a coordinated, sustainable approach to the assessment and provision of retail within the GDA so that

- *Adequate and suitable provision is made to meet the needs of the growing and changing population.*
- *Retail in suitable locations is provided, integrated within existing growth areas and public transport investment and*
- *Significant overprovision, which would place more marginal locations under severe pressure and undermine sustainability driven policies aimed at revitalising town centres is avoided”.*

“The strategy states that it is important where large areas of new housing are planned that new retail centres are provided in tandem with the housing at a scale appropriate to meet the regular convenience and lower order shopping needs of these new communities”.

The proposed development at Clongriffin provides for a considerable quantum of commercial floor area in the region of c.22,727.5 sq.m., all of which will provide a variety of uses. The total overall commercial development constructed, permitted and proposed for Clongriffin will comprise 45,463.5 sq.m. of mixed-use commercial/retail/office/town centre development and has the potential to offer substantial employment opportunities to the community of Clongriffin such that it will be possible to live and work in the town. It is therefore submitted that the proposed development will build on existing attributes within the growing community of Clongriffin, will integrate with and complete Clongriffin town centre, and will boost the area through the introduction of a considerable residential population by developing 1,950 no. high-quality designed residential units with these complementary, mixed lands uses. This ultimately will reinforce and establish Clongriffin town centre as a sustainable anchor for the surrounding suburbs.

Overall, the proposed development has been designed having due consideration to the objectives set out in the LAP and is therefore considered consistent with the proper planning and sustainable development of the area.

4.3 Economic and Retail Study 2018 – Belmayne and Clongriffin

In April - July 2018, AECOM Ltd. completed an economic and retail study on the Belmayne-Clongriffin area on behalf of Dublin City Council. The report states:

“This Economic and Retail Study for the Clongriffin-Belmayne area of north Dublin has been prepared by AECOM Ltd, in conjunction with Braniff Associates. It was commissioned by Dublin City Council in order to obtain an independent, evidence-based understanding of the economic and retail potential of the area”.

The intention of the report was to act as an advisory on retail provision in the area for Dublin City Council. A number of statements are made in the conclusion, including:

“Despite the high level of vacant units in evidence, as well as extant permission for more, there is scope to develop further economic and retail space in the LAP area. This is due principally to the significant population growth envisaged for this location”.

“While it is recognised that economic conditions and market interest will ultimately determine how much economic and retail floorspace will be built in this area in the coming years this Study is intended to assist the Council in planning for such development. Finally, it must be emphasized that the floorspace findings in this Study are advisory in nature and are not intended to serve as prescriptive floorspace caps on future economic and retail development in the LAP area”.

It is important to note that the commercial floorspace applied for in the parent permission at Clongriffin (Reg. Ref. 0132/02) amounted to c.85,000 sq.m. which was amended by subsequent permissions to provide for c.100,000 sq.m. of commercial space. That overall figure through the current planning applications is now proposed to be reduced to c.45,463.5 sq.m. It is submitted that this reduced overall quantum is more reflective of recent studies undertaken in the area and is in more so in keeping with the overall vision for the North Fringe as a result. For further information in this regard, please refer to the Social and Community Infrastructure Audit Report and Planning Report, both of which have been prepared by Downey Planning.

5.0 Material Contravention

A Statement has been prepared which outlines the justification of the proposed development on lands at Clongriffin, Dublin 13, which materially contravenes the Dublin City Development Plan 2016-2022 and the Clongriffin-Belmayne Local Area Plan 2012-2018. It is respectfully submitted that the justification set out within the Material Contravention Statement clearly demonstrates that the proposed development at Clongriffin should be considered for increased building height at Blocks 17 and 26, due to the location of the proposed landmark, taller buildings being adjacent to quality public transport corridors, and the policies and objectives set out within the Section 28 Guidelines. Such justification includes:

- Conflicting objectives exist within the Clongriffin-Belmayne Local Area Plan and Dublin City Council Development Plan 2016-2022 insofar as the proposed development is concerned;
- The development represents the last remaining sites within Clongriffin town centre which are in close proximity to quality public transportation i.e. the Clongriffin DART station and Malahide to Dublin City QBC is within 100m walking distance;
- Improved public transportation is also planned for the Malahide to Dublin City Centre QBC under the Bus Connects proposal;
- National Policy promotes and encourages increased densities in excess of 50 units per hectare on zoned lands adjacent to public transport corridors;

- National Planning Framework and its objectives place a strong emphasis on increased building heights in appropriate locations within existing urban centres and along public transport corridors such as the development sites; and,
- The proposed development is consistent with the recent publication of the *“Urban Development and Building Heights, Guidelines for Planning Authorities”*.

The Statement has also highlighted the inconsistencies that exist between the Local Area Plan and the City Development Plan in relation to the school site designation. The lands located to the south of Main Street and immediately north of the Grange Community College are in the ownership of the Department of Education and are appropriately sited close to the existing school, the playing fields, the leisure centre and Fr. Collin’s Park, are located centrally to the wider community adjacent to excellent transport links, would create an educational hub at this central location south of Main Street, which is consistent with the objectives of the Local Area Plan in this regard and are zoned for education uses. Block 8 is not a suitable site given its location immediately bonding the rail line and at a remove from the cluster of community and sports facilities to the south west of Clongriffin. Furthermore, these lands are zoned for residential development or SDRA and KDC under the Development Plan. As such, the objectives for the school site in the Clongriffin-Belmayne LAP are inconsistent with the designations contained within the Dublin City Development Plan.

The optimal location for a school within Clongriffin is not the Block 8 site but rather the lands to the immediate south of Main Street which adjoin the existing Grange Community School. It is considered that the site immediately north of the existing school (i.e. Grange Community College) is the optimal location for a school within Clongriffin as it will result in the concentration of services within the same area and will reduce the impact of traffic and make viable use of synergistic uses, this is in accordance with the Local Area Plan objective of clustering social infrastructure. As such, it is submitted that the site designated for educational use within the City Development Plan is better placed to meet the objectives of the pertaining Local Area Plan.

Thus, Downey Planning are of the considered opinion that the Development Plan designation is more consistent with the proper planning and sustainable development of the area and noting regulations under the PDA 2000 (as amended), section 18 (4)(b). Thus, it is submitted that the Block 8 site is more suitable for residential development such as that proposed as part of this development proposal.

Furthermore, it is important to note that Downey Planning have prepared a School Demand Assessment Report which comprises a review of the local area and has identified the existing schools within the vicinity of the site and their available capacity. The report illustrates that the available capacity within the existing 23 no. primary schools comprises 120 no. spaces, whereas there are 455 no. available spaces within the existing 7 no. post-primary schools, this results in 575 no. available spaces in total. It is worth mentioning that an additional 960 no. spaces for the 2019 enrolment period will be provided upon completion of the 2 no. primary schools in the Belmayne area, therefore increasing the available capacity to 1,157 no. spaces. Therefore, it is considered that there is adequate capacity in the area to cater for the proposed development given that the demand generated by the proposed scheme would be 1,062 no. spaces which is well within the available capacity. Furthermore, the suggested optimal location for a new school would see an addition of at least 480 no. spaces, within the strategic location north of the Grange Community College. As such, the available capacity would be approximately 1,637 no. spaces, more than twice the necessary quantum that would be

required for the overall development. Downey Planning are of the considered opinion that there is more than sufficient capacity to cater for the proposed development and the surrounding area within the existing schools and if required, a new school to the north of Grange Community School.

At this juncture, it is important to highlight the Departments site acquisitions and site developments in the area in recent months. The Department are currently constructing schools within the local area and to our knowledge are pursuing expansion plans for existing schools. The applicant has not been contacted regarding the acquisition of a potential school site (i.e. Block 8) and noting the existing capacity in existing schools, the recent acquisition of new school sites to provide additional schools, the school sites currently under construction in the area and indeed the existing zoned lands to the north of Grange Community College which could provide an additional school, it is submitted that the current proposal seeking planning permission for residential development is justified in this instance.

In light of the foregoing, it is respectfully requested that An Bord Pleanála have regard to the justification set out within the Material Contravention Statement and permit the proposed contravention of the Dublin City Council Development Plan 2016-2022 and Clongriffin-Belmayne Local Area Plan 2012-2018 (extended until 2022), having consideration to section 37(2)(b) (i) and (iii) of the Planning and Development Act, 2000 (as amended), specifically the conflicting objectives in place insofar as the proposed development is concerned, the policies and objectives set out within the Section 28 Guidelines and noting the national importance of delivering housing and sustainable neighbourhoods given the current housing crisis.

6.0 Conclusion

This Statement demonstrates that the proposed development is in compliance with relevant national, regional and local planning policy. It is submitted that the proposed development will provide an appropriate form of development on the subject lands that are zoned both SDR and key district centre, zoning designations which permit in principle residential use and other complementary land uses such as that proposed. The proposed development will provide for an effective, efficient, sustainable use of what are some of the last remaining development sites within Clongriffin which is a highly accessible location very well served by public transport (DART and QBC).

The nature, form and extent of the proposed development has been informed and guided by pre-application consultation with the various internal departments of Dublin City Council and with An Bord Pleanála prior to the finalisation of this SHD proposal.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development at Clongriffin represents a high-quality Strategic Housing Development proposal which is now being submitted for the consideration of An Bord Pleanála.