

Large- Scale
Residential
Development

LRD-Stage 3
Planning
Application

Planning Report &
Statement of
Consistency

St. Mochta's LRD

Proposed Large-Scale
Residential Development

At lands in the Townland of
Porterstown, Clonsilla,
Dublin 15.

For Castlethorn
Developments Luttrellstown
Limited

June 2025

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1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners and Development Consultants have been instructed by our client, Castlethorn Developments Luttrellstown Limited (*"the Prospective LRD Applicant"*), Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6. , to prepare this Planning Application Report and Statement of Consistency to accompany a planning application for Large-Scale Residential Development (LRD).

The application net site area measures c 4.39ha, with the site generally bounded by Diswellstown Road/ Dr. Troy Bridge to the east, the Royal Canal and the Dublin-Maynooth Railway Line to the north, development consented under An Bord Pleanála Reg. Ref. ABP-312318-21 as amended by Reg. Ref. LRD0034-S3 to the south and residential zoned lands within the Eastern Development Area (DA1) of the Kellystown Local Area Plan to the west.

The proposed development seeks permission for the construction of 302no. residential units, comprising houses, duplexes and apartments, providing 1-bed, 2-bed, 3-bed and 4-bed dwellings, at lands predominately in use as a football club (St Mochta's FC grounds) at present in the townland of Porterstown, Clonsilla, Dublin 15.

The relocation of St Mochta's Football Club to the lands to the south of the Kellystown Link Road, currently subject of planning application FW25A/0033E (decision due 23.06.2025), facilitates the redevelopment of their existing grounds and adjoining grounds for residential use, as per the requirements of the Kellystown Local Area Plan.

For a more comprehensive description of the proposed development, please refer to Section 6 of this report, and to the plans and particulars that accompany this LRD Planning Application.

This Planning Application Report sets out how, in our opinion, the proposed scheme complies with the proper planning and development of the area in the context of the relevant strategic and local planning policy, as primarily expressed in: -

- National Planning Framework, Ireland 2040.
- Eastern & Midlands Regional Spatial & Economic Strategy and Dublin Metropolitan Area Spatial Plan, 2019-2031.
- Fingal County Development Plan 2023 – 2029.
- Kellystown Local Area Plan 2021.
- Sustainable and Compact Settlements Guidelines for Planning Authorities (2024).
- Sustainable Urban Housing: Design Standards for New Apartments (2023).
- Urban Development and Building Height Guidelines for Planning Authorities (2020).
- Quality Housing for Sustainable Communities (2007).
- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Dublin area.

This Report should be read in conjunction with the plans and particulars accompanying this formal submission. This overall submission has been prepared by a design team comprising: -

- Stephen Little & Associates, Chartered Planners and Development Consultants.
- O'Mahony Pike Architecture
- Doyle & O'Troithigh Landscape Architects
- Waterman Moylan Consulting Engineers
- Enviroguide Consulting
- The Tree File Consulting Arborists
- Sabre Electrical

- Modelworks

In accordance with the statutory Planning Regulations, we confirm that an electronic fund transfer to the sum of €49,260 has been made to Fingal County Council as the appropriate fee in this instance (proof of payment enclosed). The Application Form 19 associated with this stage of the LRD Application Process has been completed and is also enclosed herewith. A complete list of enclosures with this application can be found at Section 14 of this Report.

We can confirm that a Section 247 Pre-Planning Consultation meeting (LRD Stage 1) and Local Authority's Opinion Pre-Planning Consultation Section 32(B) meeting (LRD Stage 2) have both taken place with the Planning Authority (Fingal County Council), on 20 June 2024 and 13 March 2025 respectively.

We refer the Planning Authority to the enclosed Response to LRD Opinion Report, prepared by Stephen Little & Associates which provides a detailed response to the Items raised within the Fingal County Council Opinion issued on 09 April 2025.

1.1 Compliance With Planning Legislation

The Planning and Development (Amendment) (Large-Scale Residential Development) Act', amending Section 2 of the Planning & Development (Housing) and Residential Tenancies Act 2016, defines 'large-scale residential development', inter alia, as.

"Large-scale residential development' means a development that includes –

(a) The development of 100 or more houses,

(b) The development of student accommodation that included 200 or more bed spaces,

(c) Both the development of 100 or more houses and of student accommodation, or

(d) Both the development of student accommodation that included 200 or more bed spaces and of houses,

Where the LRD floor space of -

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

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

(iii) In the case of paragraph (c) and (d), the buildings comprising the houses and the student accommodation,

Is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development;"

The proposed development includes 302no. dwellings. It is in excess of the relevant 100 unit threshold for LRD Planning Applications. In addition, the proposal is solely for residential use and therefore complies with the 70 percent residential use threshold for LRD Planning Applications.

LRD Consultation

We can confirm that a:

- Section 247 Pre-Planning Consultation meeting (LRD Stage 1) took place on 20 June 2024.
- Section 32(B) LRD Consultation Meeting (LRD Stage 2) took place on 13 March 2025, and Local Authority's Opinion on Pre-Planning Consultation was subsequently issued.

These consultations took place online via MS Teams.

Planning Application Drawings

The enclosed planning application drawings have been screened by this office for consistency with the Planning & Development Regulations 2001, as amended.

Statutory Notice

In accordance with Article 18(1)(d)(iv) of the Regulations, the statutory planning notice (site notice and newspaper notice) includes confirmation that the planning application is LRD. It also includes a website address where the application can be viewed by the public at www.stmochtaslrd.ie

2 THE APPLICANT

The Applicant in this case is Castlethorn Developments Luttrellstown Limited. The required details of which are as follows: -

Name: Castlethorn Developments Luttrellstown Limited.

Address: Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6

Telephone: 01 2164060

Email: jleonard@castlethorn.ie

We can confirm that the Applicant owns the lands that are subject to this application.

3 OWNERSHIP

A letter of consent from Fingal County Council (FCC) is enclosed herewith, relating to the portion of land within their ownership

We can confirm that the balance of the lands are within the ownership of the applicant. In relation to land under Diswellstown Road Overpass, we note that Castlethorn built the overpass on their lands and have retained ownership of the land underneath the bridge and Castlethorn confirms that they have sufficient legal interest and control to facilitate development of the playground, recreational facilities and pedestrian links to Riverwood Square, as proposed as part of the subject LRD planning application.

4 THE AGENT

This LRD Planning Application to Fingal County Council has been co-ordinated by Stephen Little & Associates, Chartered Town Planners and Development Consultants under a Design Team led by O'Mahony Pike Architects

For the purposes of this Planning Application, details of the agent are set out below for the convenience of the Planning Authority:

Name: Stephen Little & Associates, Chartered Town Planners & Development Consultants.

Address: 26/27 Upper Pembroke Street, Dublin 2 D02 X361.

Telephone: 01-676 65 07.

Email: info@sla-pdc.com.

5 SITE DESCRIPTION & CONTEXT

5.1 Site Description

The LRD application site is located at lands zoned 'RA – Residential Area', to "Provide for new residential communities, subject to the provision of the necessary social and physical infrastructure" and subject of the Kellystown Local Area Plan 2021 (the "LAP"), under the Fingal County Development Plan 2023-2029. It is further subject to the development objectives for lands within the Eastern Development Area (DA1) of the Kellystown LAP, for early phase development.

The application site measures c.4.39ha. It is level and has an established use as sports grounds. It is currently occupied by football pitches and club house facilities, in use by St. Mochta's Football Club. The

site has an existing vehicular site entrance from and frontage to the Old Porterstown Road along its western boundary. St Brigid's Traveller Accommodation site shares frontage with the Porterstown Road, to the south west corner of the site.

The site is otherwise generally bounded by Diswellstown Road/ Dr. Troy Bridge to the east, the Royal Canal and the Dublin-Maynooth Railway Line to the north, Abbey Cottage to the north west, and a consented SHD/LRD scheme (ABP-312318-21 as amended by LRD0034-S3) to the west and south.

A planning application (FW25A/0033E) by the same applicant for proposed development relating to the relocation of St. Mochta's Football Club facilities, to commensurate grounds south of the Kellystown Link Road, is due to be decided by Fingal County Council by 23 June 2025. The relocation of the St Mochta's FC grounds to the lands, zoned Open Space and neighbouring the existing school campus, is in accordance with Key Objective DA 1.1 for the Eastern Development Area of the Kellystown Local Area Plan.



Figure 1: Extract from Fingal County Development Plan 2023-2029 Land Use Zoning Map, showing LRD Application Site (red outline) and site of FW25/0033E for relocation of St Mochta's FC. (SLA Overlay)



Figure 2: Application Site (Source: Google Earth with red line overlay by SLA). See enclosed Site Location Plan, prepared by O'Mahony Pike Architects, for the definitive red line application site boundary.

5.2 Planning History

5.2.1 Application Site

5.2.1.1 FW12A/0048

Permission sought by St Mochta's Football Club for the construction of:

- 1) an all weather soccer pitch (90m x 30m) adjacent to existing cabin changing facilities with 2.4m high perimeter fencing and additional 3.6m high ball stop netting above (6m overall height). Pitch flood lighting in the form of 6 no. 12m high columns with a total of 12 no. light fittings.
- 2) Pitch flood lighting to existing 100m x 60m senior grass pitch in the form of 6 no. 15m high columns with a total of 24 no. light fittings along with 6 no. light fittings facing the adjacent existing grass pitch.
- 3) and all associated site works.

A Final Grant was issued by Fingal County Council on 21 February 2013, subject to 7no. conditions.

This development exists on site.

5.2.2 Adjacent Lands

5.2.2.1 Concurrent Residential Application (a.k.a. Luttrellstown Gate Phase 2)

Castlethorn Developments Luttrellstown Limited applied for Permission at a site (c. 3.68ha) in the townlands of Porterstown and Kellystown, Dublin 15.

The site is located within the Kellystown Local Area Plan development boundary. The site is generally bounded to the north by the Dublin-Maynooth rail line, to the south and east by permitted Strategic Housing Development (ABP-312318-21 as amended by LRD0034/S3) known as Luttrellstown Gate (Phase 1), with the shared boundary defined by hedgerow, and to the west by agricultural lands.

The site boundary extends to the southwest to accommodate foul drainage to a permitted foul pumping station and surface water drainage to a permitted attenuation pond (both on Phase 1 lands permitted under ABP-312318-21 as amended by LRD0034/S3).

The proposed development comprises **99 no. dwellings**, in a mix of houses and duplex units / own-door apartments, ranging from 2-3 storeys in height, including 87 no. houses (66 no. 3-bed and 21 no. 4-bed), and 12 no. duplex/apartment units with balconies (4 no. 1-bed and 8 no. 2-bed).

Associated and ancillary site development, landscaping and boundary treatment works, include: 132 no. surface car parking spaces; 158 no. bicycle parking spaces for mid-terrace and duplex units; Bin stores; Private, communal and public open space; Public lighting; Minor amendments to the permitted surface water attenuation pond. Vehicular access is provided off the existing Kellystown Link Road via the internal roads of Luttrellstown Gate (Phase 1).

That application will be accompanied by the same EIAR that accompanies this LRD planning application.

5.2.2.2 FCC Reg. Ref: FW25A/0033E – Relocation of St. Mochta's FC

Castlethorn Developments Luttrellstown Limited applied for permission, on 31 January 2025, for development comprising the relocation of St Mochta's FC from its current grounds at the old Porterstown Road to a greenfield site zoned for 'Open Space' within the Kellystown LAP development boundary, to the south of the permitted 'Kellystown Link Road'.

The proposed development includes:

- 6no. playing pitches, comprising
 - 1no. 11-a-side grass turf, floodlit playing pitch,
 - 1no. 11-a-side synthetic turf, floodlit playing pitch,
 - 1no. 9-a-side synthetic turf, floodlit playing pitch,
 - 1no. 7-a-side grass turf, floodlit playing pitch and
 - 2no. 5-a-side synthetic turf pitches;

- goal nets; perimeter pitch fencing; ball stop netting;
- 1no. 1-2 storey clubhouse (c.533 sq m);
- car, cycle and motorcycle parking spaces; 1no. coach set-down space;
- 1no. maintenance shed;
- Access via the existing Cemetery Road, with 2no. combined vehicular, cyclist and pedestrian access points proposed.
- All associated ancillary site development works, including regrading of the pitch areas, construction of a new 4.5m wide footpath and cycle path on the eastern side of Cemetery Road from the junction of Kellystown Link Road to the main pedestrian & cycle access point into St. Mochta's Football Club, landscaping, boundary treatments and signage.

Fingal County Council issued a Request for Further Information on 24 March 2025. The Applicant's response to this request was made on 26 May 2025. A decision is due 23 June 2025.

5.2.2.3 ABP-312318-21 - Kellystown SHD (a.k.a. Luttrellstown Gate Phase 1)

The consented SHD scheme ABP-312318-21 was granted (with 27no. conditions) on 2 March 2023, under section 9(4) of the Planning and Development (Housing) and Residential Tenancies Act 2016 for a Strategic Housing Development.

The consented scheme includes **346no. dwellings** (123no. houses and 3no. apartment buildings accommodating 223no. apartment units)¹, 1no. childcare facility (c. 528 sq m) and 1no. retail unit (c. 236 sq m), in buildings ranging from 2 to 8-storeys, and associated site works.

The overall gross site area of the entire consented scheme amounts to c. 9.73 ha.

The breakdown of accommodation is as follows: -

- 123no. own door detached, semi-detached, terraced and end of terrace houses, (including 99no. 3- bed, 2 -storey houses, 24no. 4-bed, 2 to 3-storey houses and private rear gardens are provided for all houses.)
- 3no. apartment buildings, accommodating 223no. apartment units, internal residential amenities and non-residential units, including:
 - **Block A:** 4 to 8-storey building, accommodating 165no. apartments (67no. 1-beds and 98no. 2- beds)², internal residential amenity area (c. 406 sq m) and a ground floor retail unit (c. 236 sq m) – *See amending LRD0034-S3 below*
 - **Block B:** 4 to 5-storey building, accommodating 34no. apartments (9no. 1-beds, 21no. 2-beds and 4no. 3-beds) and a ground floor childcare facility (c.528.2 sq m) .
 - **Block C:** 4 to 6-storey building, accommodating 24no. apartments (5no. 1-beds and 19no. 2-beds). Private patios / terraces or balconies are provided for all apartment units, on all elevations of the proposed apartment buildings.

And, all associated and ancillary site development and infrastructural works, hard and soft landscaping and boundary treatment works, including:

- Road infrastructure works, including: -
 - Upgrading of existing section of 'Kellystown Link Road' (c.280m), between the Diswellstown Road junction to a point west of the existing main vehicular entrance to Scoil Choilm Community National School, to provide new and enhanced pedestrian and cycle facilities, new left turn lane, provision of Toucan crossing, upgrade of existing junctions with Porterstown Road and Diswellstown Road / Overbridge.

¹ Note that this takes account of Condition 2(a) requiring omission of 3no. 1-bed units and the absorption of their floor area into the adjoining 2-bed units in Block A. It does not take account of amending LRD0034-S3 (below).

² This does not take account of amending LRD0034-S3 .

- A new c. 160m western extension of the 'Kellystown Link Road', including new pedestrian, cycle and crossing facilities and 1no. new vehicular access to the scheme. ○ 3no. new vehicular site entrances on the Porterstown Road.
- New internal residential road network including pedestrian and cycle links and green routes, including segregated pedestrian and cycle link aligned along the western edge of the existing Porterstown Road.
- Pedestrian and cycle access to the proposed public park to the south west.
- Pedestrian, cyclist and vehicular connections to facilitate future access to future development lands to the west.
- Repositioning of existing vehicular site entrance to 'Abbey Cottage' on its eastern boundary to Porterstown Road.
- New dedicated public park with active and passive recreation facilities (c. 2.1 ha), smaller public pocket parks, green infrastructure links and communal private open space.
- Waste water infrastructure, including pumping station, pipe network and associated service road to connect to a public watermain under the proposed 'Kellystown Link Road'.
- Surface Water network with associated SuDS devices and attenuation pond with forebay.
- Upgrade works to existing drainage infrastructure in the Riverwood Distributor Road.
- 385no. car parking spaces, including: 170no. spaces on-curtilage and on-street for the houses; 140no. spaces for the apartments; and 14no. spaces for the proposed commercial unit and creche, 58no. visitor spaces and 3no. ESB service spaces.
- 22no. motorcycle parking spaces for the apartment units.
- 630no. bicycle parking spaces, including 402no. covered spaces in dedicated secure facilities and 228no. uncovered spaces.
- Bin and bicycle storage for all houses and apartment blocks.
- ESB sub-station units.
- Demolition of the existing vacant house and agricultural buildings.

5.2.2.4 LRD0034-S3 - Kellystown SHD Block A Amendments

Castlethorn Construction Unlimited Company applied for permission for proposed amendments to the consented SHD scheme ABP-312318-21, comprising changes to Apartment Block A and its immediate curtilage only.

This includes:

- The reconfiguration of **Block A** to accommodate **193no. dwellings** in total (an increase of 28no. dwellings),
 - in buildings ranging between 2 and 8 storeys in height;
 - with 82no. 1-beds and 108no. 2-bed apartment units, and 3no. 2-bed duplex units; and
 - associated reconfiguration of internal floor plans to accommodate an increase from 31no. to 34no. apartment units per floor.
- Reduced floor area of the internal residential amenity area (from c.405.7 sq m to c.120.9 sqm).
- Reduced floor area of the retail unit (from c.236 sq m to c.200.6 sq m).
- And all associated and ancillary site development, infrastructural, hard and soft landscaping and boundary treatment works.

A Final Grant of Permission was issued by Fingal County Council on 21 August 2024, subject to 17no. conditions.

5.2.2.5 Planning History – Cumulative Development

Luttrellstown Gate Phase 1 (Kellystown SHD ABP-312318-21, as amended by LRD0034-S3) comprises a total of 374no. dwellings. Combined with the subject application (302no. dwellings) and impending Luttrellstown Gate Phase 2 application (99no. dwellings), a total yield of 775no. dwellings will be delivered within the Eastern Development Area of the Kellystown Local Area Plan, by the same developer.

Having regard to the cumulative development of permitted and proposed dwellings, an Environmental Impact Assessment Report (EIAR) accompanies this LRD planning application. The same EIAR accompanies the Luttrellstown Gate Phase 2 application.

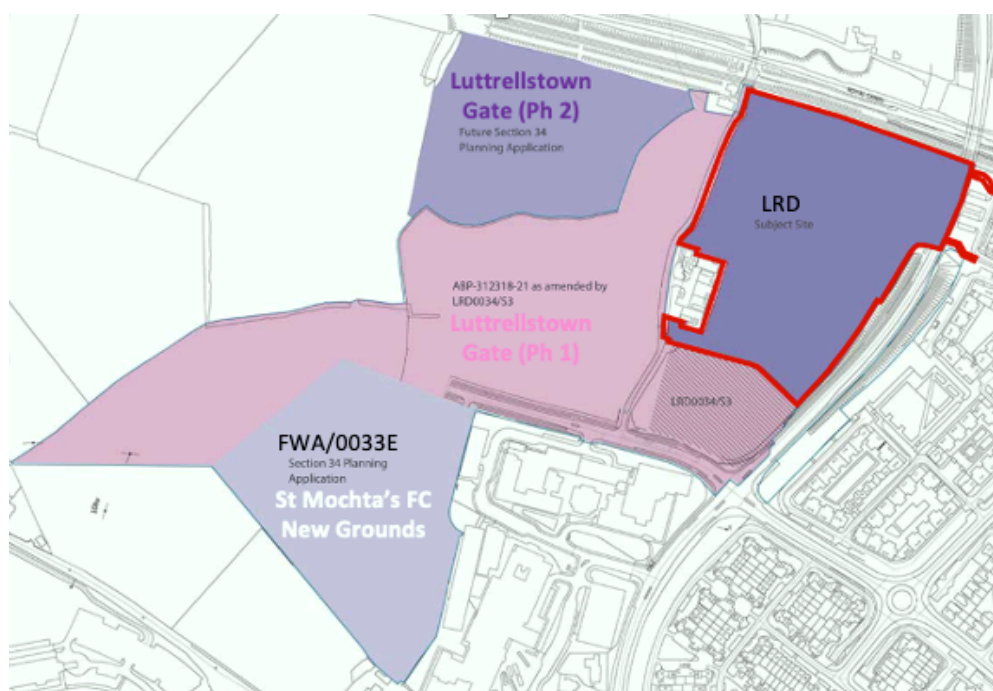


Figure 3: Diagram showing permitted and proposed adjoining developments (Source: Design Statement, prepared by O'Mahony Pike Architects, with SLA text overlay.

6 PRIOR CONSULTATION IN RESPECT OF PROSPECTIVE LARGE-SCALE RESIDENTIAL DEVELOPMENT

6.1 Section 247 Consultation with Fingal County Council

We can confirm that a formal Section 247 Pre-Planning Meeting was held with the FCC on 20 June 2024 as required under Section 32B(1) of the Act and were attended by representatives from FCC, the Prospective Applicant and Design Team. The meeting was attended by the following officials of the Planning Authority:

- Sean Walsh, Senior Executive Planner
- Kathy Tuck, Executive Planner
- Darragh Ball, Student Planner
- Darragh Sheedy, Executive Engineer

- Niamh O'Connor, Executive Engineer Transport
- Gemma Carr, Senior Executive Parks & Landscape Officer
- Helena Bergin, Senior Architectural Conservation Officer
- Rian Glynn, Housing Department
- Aoife Dunne, Staff Officer Part V
- Mary O'Reilly, Admin

The following is a summary of the main points raised during the pre-planning meeting: -

- **Roads Dept.**
 - Confirmed the general pedestrian and cyclist permeability into, through and around the development is generally good. Connections from the internal roads to the infrastructure should be provided.
 - Car parking – Sustainable Residential Developments and Compact Settlements; Guidelines for Planning Authorities published in January 2024. The site deemed to be accessible location.
 - Consideration should be given to roll out of EV charging.
 - For the apartments motorbike parking needs to be addressed 1 per 10 parking spaces
 - Consider mobility hub, with car club sharing.
 - Road hierarchy acceptable and generally in line with the LAP – consider more traffic calming to be designed into the road layout – in particular the north south access road
- **Drainage Dept.**
 - Requested to complete Site-Specific Flood Risk Assessment for the application.
- **Parks Dept.**
 - Directed to consider Table 4.2 of the Development Plan in relation to Public Open Space requirements.
 - Query on play provision within the scheme.
 - Details required in relation to the provision of Public Open Space.
- **Conservation Department**
 - Require further design detail on taller buildings proposed, in particular those located at the north of the lands where they could be visible from within the protected structure of the Royal Canal.
- **Planning Dept.**
 - Density of c. 70 units per hectare is acceptable in terms of the Local Area Plan.
 - Welcomed the provision of 'upside down' units.
 - Encouraged to consider the materiality.
 - Consider Dart+ in plan and consider further separation to rail line.
 - Phasing arrangements to be provided.
 - Consider AA & EIA requirements.

6.2 Section 32(C) & 32(D) – Stage 2 Formal LRD Meeting & Stage 2 Opinion

We refer the Planning Authority to the accompanying Large Scale Residential Development Opinion Response document, prepared by Stephen Little & Associates for details of the applicant's response to the opinion issued by FCC on 09 April 2025.

A formal LRD Pre-Planning Meeting was held with Fingal County Council on 13 March 2025, in accordance with Section 32(C) of the Planning and Development Act 2000, as amended.

The consultation was attended by the following officers of the Planning Authority:

- Brian McParland, Exec Planning
- Cathy Ann Murphy, Exec Planner
- Shauna Hughes, Housing
- Philip Grobler, Water Services
- Niamh O'Connor, Transport
- Anne Marie Meagher, Parks
- Helena Bergin, Conservation

Following this meeting, an LRD Stage 2 Opinion was received on 09 April 2025 (enclosed with this application), outlining the issues arising from the meeting,

The list below identifies, in summary, the main topics discussed by Fingal County Council in the LRD Opinion. For full details and response to the LRD Opinion please refer to the enclosed report entitled '**Response to LRD Opinion Report**', prepared by Stephen Little & Associates.

- Housing Part V
- Transport
- Parks and Landscaping
- Water & Drainage
- Conservation
- Planning
- EIA & AA

The proposal subject of this LRD Planning Application to Fingal County Council has had full regard to the issues raised by the Planning Authority at pre-planning consultation stages, both Stage 1 and Stage 2.

We do however acknowledge the 'wholly without prejudice' nature of these Pre-Planning Consultations.

7 PARTICULARS OF THE PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT

Following s.247 consultation and the Section 32C LRD meeting with the planning authority, planning permission is now sought for the proposed LRD development described in brief as follows: –

The site is located within the Kellystown Local Area Plan development boundary and is predominately in use as football pitches for St. Mochta's Football Club. A new purpose-planned sportsground for St. Mochta's FC forms the subject of a concurrent planning application with Fingal County Council (Reg. Ref. FW25A/0033E) as required under the Kellystown Local Area Plan 2021. The site is generally bounded to the north by the Royal Canal and Dublin-Maynooth rail line, Diswellstown Road/ Dr. Troy Bridge to the east, by permitted Strategic Housing Development (ABP-312318-21 as amended by LRD0034/S3) known as Luttrellstown Gate (Phase 1) to the south and west.

The proposed development consists of 302no. residential units in a mix of houses, duplexes and apartments ranging from 2 – 7 storeys in height comprising: -

- 97no. Houses (62no. 3-bed and 35no. 4-bed) ranging in heights of 2-3 storeys
- 205no. Apartment / Duplex Units (98no. 1-bed, 88no. 2-bed and 19no. 3-bed) across 4no. blocks comprising:
 - Block D ranging in height from 5-7 storeys accommodating 57no. apartment units;
 - Block E ranging in height from 5-7 storeys accommodating 77no. apartment units;
 - Block F ranging in height from 4-5 storeys accommodating 29no. apartment units and 10no. duplex units;
 - Duplex Blocks G1, G2, G3 & G4 3 storeys in height accommodating 32no. duplex and simplex units;
- The provision of 241no. car parking spaces and 993no. bicycle parking spaces;
- Private, communal and public open space provision including a new children's playground and active recreational facilities as well as all associated landscaping and boundary treatments;
- Vehicular access is provided off the existing Kellystown Link Road via the internal roads of Luttrellstown Gate (Phase 1).

Key Statistics	Proposed
Total Number of Units	302no. units
Red Line Area	4.39Ha
Net Site Area	3.96ha
Net Density	76no. units per ha
Unit Mix	<ul style="list-style-type: none"> • 35no. 4 bed houses • 62no. 3bed houses • 19no. 3bed duplex units • 7no. 2 bed duplex units • 81no. 2bed apartments • 98no. 1bed apartments
Car Parking	241no. spaces
Cycle Parking	993no. spaces

Table 1: Key Site Statistics.

Further details can also be found in the Schedule of Accommodation and Housing Quality Assessment, together with the Unit Type drawings, prepared by O'Mahony Pike Architects enclosed with this submission.

The relocation of St Mochta's FC will unlock the LRD application site for development. A planning application (FW25A/0033E) by the same applicant for proposed development relating to the relocation of St. Mochta's Football Club facilities, to commensurate grounds south of the Kellystown Link Road, is due to be decided by Fingal County Council by 23 June 2025. The relocation of the St Mochta's FC grounds to the lands, zoned Open Space and neighbouring the existing school campus, is in accordance with Key Objective DA 1.1 for the Eastern Development Area of the Kellystown Local Area Plan.



Figure 4: Extract from Proposed Site Layout Plan Drawing prepared by O'Mahony Pike Architecture

7.1 Design and Layout

We refer the Planning Authority in the first instance to the Design Statement, prepared by O'Mahony Pike Architects, which sets out the design rationale for the proposed development having regard to the specific site conditions and planning context.

The proposal has been informed by the design parameters of the Kellystown Local Area Plan, and displays the following key design characteristics:

- The provision of a generous open space along the eastern site boundary of the residential area, varying in width from c. 16m to c. 44m, creating a buffer area between the residential units and the Diswellstown Overpass, which can be planted to provide screening and amenity.
- A simple, robust urban block pattern, which creates homezones, generally providing a view towards the public open space.
- The proposed road network connects with the permitted looped access road in the Kellystown consented development to the west, and as indicated by the LAP site layout diagram.
- The eastern and northern green areas facilitate a continuation of the 4m cycle and pedestrian route that was permitted under ABP-312318-21, in accordance with the LAP. This facilitates pedestrian and cycle connectivity to Riverwood Square, to the east of the site, under the Dr Troy bridge.
- The provision of green areas along the western site boundary, which when combined with the permitted green spaces on the western side of the Porterstown Road (ABP-312318-21, as amended by LRD0034-S3) will create a very generous green corridor, 25-30m in width, along the route of the old Porterstown Road. The old Porterstown Road is due to become a primarily pedestrian/cycle route when DART+West is implemented, removing the level crossing at Porterstown and vehicle movement along this route.

The proposed development seeks to build on the success of Luttrellstown Gate Phase 1 (permitted under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRDO034-S3) and cohesively integrate the next phase of sequential development in Kellystown Eastern Development Area.

Within the residential development, a series of urban blocks are arranged so as to create visual permeability & connectivity between the local access loop and the eastern public open space. The proposal comprises a mixture of apartments, duplexes and houses, with the apartments positioned so as to create strong urban edges to the public open spaces. The duplexes are arranged so as to create an urban block to enclose the western boundary with the St. Brigids Traveller Accommodation.

7.2 Residential Density

The site can be best described as a 'City – Suburban / Urban Extension' site, located within 1km – 1.5km of high capacity commuter rail stations at Coolmine and Clonsilla, which are also planned to be electrified as part of DART+ West project.



Figure 5: Site Proximity to Clonsilla and Coolmine Commuter Rail Stations. Extract from Design Statement prepared by O'Mahony Pike Architecture

As confirmed above, the proposed development of 302no. dwellings comprising house, duplex and apartment units provides a net residential density of 76no. dwellings per hectare.

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) sets national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. The 2024 Guidelines replace the Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities (2009).

Under the 2024 Guidelines, the application site can be reasonably categorised as a 'City – Suburban / Urban Extension'. Within these areas, the guidelines note,

*"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the **range 40 dph to 80 dph (net)** shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that **densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations** (as defined in Table 3.8)."*

The Guidelines' recommended density range, being an objective but not a Specific Planning Policy Requirement (SPPR), provides a degree of flexibility. The proposed development delivers a residential density of 76no. dph, which is consistent with the range recommended in the Guidelines. We refer the

Planning Authority to Appendix A of this report for further detailed discussion in respect of how the proposed development is consistent with the Compact Settlements Guidelines (2024).

For further context, we refer to the enclosed Architectural Design Statement, prepared by O'Mahony Pike Architects, which demonstrates compliance of the application site and adjoining / adjacent lands with the density ranges identified in the Kellystown Area Plan (see Design Statement, 'Density', p.34). We would highlight that the Kellystown LAP identifies density ranges for Development Areas as opposed to per application / plot.

When the proposed development is considered in combination with concurrent application at Luttrellstown Gate Phase 2 (99no. dwellings) and permitted development at Luttrellstown Gate Phase 1 (SHD ABP-312318-21, as amended by LRD0034-S3) a net residential density of 64no. dwellings per hectare is achieved. This falls comfortably within the range of 50-75 dwellings per hectare required for the Eastern Development Area, consistent with the density objectives of the Kellystown LAP.

We note the importance of providing a viable and sustainable overall residential mix and density within the Eastern Development Area and consider that this has been provided through the permitted and proposed development identified above.



Figure 6: Density in Context - Extract from Design Statement prepared by O'Mahony Pike Architecture

7.3 Building Height

The scheme proposes a variety of building heights in response to site conditions and considered in the context of the scale of the settlement, neighbourhoods and the buildings.

The buildings along the eastern edge of the application site vary in height from 3 - 7 storeys. The 7-storey elements are located in the northeast corner of the site, corresponding with where a "Gateway building is indicated in the Kellystown LAP, and in the southeast corner adjoining permitted Luttrellstown Gate Phase 1 Block A.

The building heights along the eastern side of the scheme provide a strong urban edge to the Eastern Development Area of the Kellystown LAP, having regard to the site boundary condition created by the Dr Troy Bridge - Diswellstown Road Overpass.

The buildings along the northern site boundary vary in scale from 3 - 7 storeys, providing a strong urban edge and passive surveillance to the railway and the Royal Canal. The proposed 3-storey duplex buildings create an appropriate urban block with buffering communal open space to the traveller accommodation site.

We refer the Planning Authority to Appendix A of this report which further discusses and confirms compliance with the 'Building Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).

The Fingal County Development Plan 2022-2028 does not prescribe building height thresholds or ranges for specific areas, but rather communicates the importance of ensuring that proposed development demonstrates and justifies the suitability and positive impact of the building height in the context of the receiving environment



Figure 7. Extract from Site Section AA prepared by O'Mahony Pike Architects.

7.3.1.1 Residential Unit Mix

The proposed development provides a unit mix of:

- 35no. 4 bed houses
- 62no. 3bed houses
- 19no. 3bed duplex units
- 7no. 2 bed duplex units
- 81no. 2bed apartments
- 98no. 1bed apartments

There is no specific unit mix requirement identified in the Development Plan.

The proposed development (302no. dwellings) together with concurrent application at Luttrellstown Gate Phase 2 (99no. dwellings) and permitted Luttrellstown Gate Phase 1 development (374no. dwellings under SHD ABP-312318-21, as amended by LRD0034-S3), provide a total of 775no. dwellings, in a mix of house, duplex and apartment unit types.

Together, the three developments offer a well-balanced mix of unit sizes, with a total of 198no. 1-bedroom units, 247no. 2-bedroom units, 270no. 3-bedroom units and 60-no. 4-bedroom units to be provided within the Eastern Development Area.

Further details of the proposed unit mix and housetype, apartment and duplex design can be found in the Architects Design Statement, Schedule of Accommodation, Housing Quality Assessment, and Unit Type drawings, all prepared by O'Mahony Pike Architects, as part of this application.

7.4 Landscape Proposals

We refer the Planning Authority to the Landscape Design Report and associated drawings prepared by Doyle O'Troithigh Landscape Architects. The key landscape design areas identified within the landscape report include:

- **“Public Open Space** - The linear park to the Eastern boundary of the site development lands has been designed as the primary area of public open space. The park design has been informed by surface SUDS measures, connections with adjoining developments and the continuation of the pedestrian and cycle way from the Block A development. The designed park is a series of pockets of four open space lawn areas which provide potential for passive and active recreation for the

residents. These pockets are framed by small areas of woodland planting into which social seating spaces have been developed. These social spaces provide direct supervision to each lawn pocket with the surrounding pathway network and residential units providing passive supervision to each lawn pocket.

- **Dr Troy Bridge Underpass** - The use of the dead space beneath the Dr Troy bridge overpass is important to the development of the site lands and to the enhancement of a space which if not developed as part of this scheme could remain unemployed and vacant.

The use of this vacant ground as an amenity area will provide an area of active recreation which is protected from the elements yet open to passive supervision. The proposal is for the development of the underpass ground plane into three distinct areas; street basketball court, formal play area for children aged 4-12 and a climbing wall for younger teens.

- **Communal Open Space** - The communal open spaces provided as part of the Apartment Blocks have been designed as garden spaces with the focus on passive recreation and the development of a areas of landscape which reflect private gardens. These pockets of landscape act both as social connection points and recreational spaces for the residents. Within the larger communal open space areas small scale play areas with non-moving items of play will be installed.
- **Streetscape** - All streets across the development have been designed to include islands of planting and tree planting set regularly across the street carparking. With larger pools of pollinator planting to create area of biodiversity across the site to encourage and develop a green infrastructure network, connecting the site internally and to the wider environment.
- **Planting** - The plant material for the proposed development will be chosen based on their long-term suitability and aesthetic appeal. We have categorised the site planting into the following key areas and types: • Feature Trees within public open space, • Smaller trees more suited to limited space/constrained planting zones (including over podiums), • Street trees (columnar/ fastigate in form), • Hedging, • Ornamental shrub planting, • Ornamental herbaceous planting, • Bulb planting.”

7.5 Water Services

We refer the Planning Authority to the enclosed Engineering Drawings and Engineering Assessment Report and Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineer, which provides the relevant details regarding water and drainage infrastructure included within the proposed development.

7.6 Transportation

We refer the Planning Authority to the enclosed Engineering Assessment Report, Traffic and Transport Assessment and Travel Plan prepared by Waterman Moylan Consulting Engineers.

These documents address how the proposed scheme considers traffic and transportation issues, including, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and capacity.

7.6.1 Access / Layout

We refer the Planning Authority to the enclosed Drawing No. P100 'Roads Layout', prepared by Waterman Moylan Consulting Engineers.

The enclosed Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers confirms that vehicular access is provided off the existing Kellystown Link Road via the internal roads of the permitted Kellystown development (Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3).

In terms of the internal road network, the Traffic and Transport Assessment confirms,

“The internal roads have been designed to comply with DMURS as required by the County Development Plan. The internal roads generally vary between 4.8m and 5.5m in width. All footpaths are 2.0m wide and connect the internal spaces.

The proposed development includes “home-zones” (also called shared surfaces), which have been designed primarily to meet the needs of pedestrians, cyclists, children, and residents. The aim is to reduce the speed and dominance of cars.”

Calming measures throughout the site are proposed, inclusive of reduced width carriageways within homezones and segregated roads.

In terms of pedestrian and cyclist infrastructure, the proposal has been designed with a well-interconnected footpath network providing permeability through the site, to the adjacent Kellystown Development. 2m wide footpaths throughout the site are proposed with a cycle path bordering the site to the north and east.

7.6.2 Bicycle Parking

A total of 993no. cycle parking spaces are proposed as part of the development, with 889no. long stay and 104no. short stay cycle spaces proposed. In terms of cycle storage, we note the following:

- **Houses** - Where a house has side or rear access to its private rear garden from the street, it is presumed that the residents of that house will store their bicycles in the private rear gardens. Where a house is terraced, and access to its private rear garden involves going through the internal ground floor of the house, secure bicycle parking is provided to the front of the dwelling, or within the streetscape in the vicinity of the dwelling.

Each terraced 3 bedroom house is provided with 5 no. secure long-stay bicycle spaces, and each 4 bedroom house is provided with 6 no. secure long-stay bicycle spaces. Generally, each terraced house is provided with 1 no. horizontal bicycle locker, which stores 2 bicycles, adjacent to its front door, and the balance of the long-stay bicycle parking is provided in on-street, gated bicycle stores.

- **Apartments** - In Blocks D, E & F, most long-stay bicycle parking is provided within dedicated bicycle stores located on the ground floor of those buildings. A combination of semi-vertical spaces and sheffield stand spaces is provided for each building. A bicycle repair station is provided within the internal bicycle stores in both Blocks E & D. Some longstay bicycle parking is also provided by external secure lockers, which are generally located in the narrow or shady parts of the communal open spaces. Please note that the area of the lockers is excluded from the communal open space quantum. 5% of all long-stay bicycle spaces are cargo-bicycle spaces, in line with the National Cycle Manual recommendations.

For the Block G1, G2, G3 & G4 duplexes, long-stay bicycle parking is provided in single storey bicycle store buildings that are located within their communal area.

We refer the Planning Authority to the Architect’s Design Statement and Schedule of Accommodation, prepared by OMP Architects as well as the Traffic and Transport Plan prepared by Waterman Moylan Consulting Engineers for further details on bicycle parking.

The proposed cycle parking provision is compliant with local and national policy as demonstrated within this report.

7.6.3 Car Parking

A total number of 241 no. car parking spaces are proposed.

The houses are generally provided with 1 no. allocated, on street car parking space. A small number of the larger houses (6 no.) are provided with 2no. on curtilage car parking spaces. This provides a ratio of 1.1 car spaces per house. The apartments and duplexes are provided with on-street car parking, at a ratio of 0.5 car spaces per unit. All parking for apartments and duplexes is provided at surface, with no podium or basement parking so as to ensure financial viability.

A “mobility hub” has been provided, as requested by Fingal County Council. The mobility hub comprises 2 no. Go-Car spaces, visitor & EV car spaces, 6 no. short stay bicycle spaces and a bicycle repair station.

We refer the Planning Authority to the Architect’s Design Statement and Schedule of Accommodation, prepared by OMP Architects as well as the Traffic and Transport Plan prepared by Waterman Moylan Consulting Engineers for further details on car parking.

The proposed car parking provision is compliant with local and national policy as demonstrated within this report.

7.7 Part V

In compliance with the requirement of Part V, 20% of all the residential units will be social & affordable units. A Part V proposal including estimate of costs is included as part of this subject LRD planning application.

A Part V Validation letter accompanies the application.

Final Part V agreement will be reached by way of condition attached to the parent permission.

7.8 Sunlight/Daylight Analysis

We refer the Planning Authority to the Daylight and Sunlight, prepared by Modelworks which provides the full technical analysis. In summary,

“Daylight The scheme performed very well for daylight provision with 95% of the rooms achieving BRE compliance when assessed without trees and 92% when assessed with trees. The weakest performing block, block F, still achieved a compliance of 87% when assessed without trees and 82% when assessed with trees.

Sunlight As with the results discussed above for daylight provision, the scheme also performs well for sunlight exposure, with 84% of the units achieving BRE compliance when assessed without trees and 83% when assessed with trees.

Amenity Areas There are three communal open spaces (COS) adjacent to the assessed units, with a total area of circa 1,887sqm and 71% of the combined total area achieves compliance for sunlight on the ground. When assessed individually, two of the spaces are compliant and one, between blocks E and F, fails to reach the BRE threshold. In addition to the communal open spaces there are three environmental spaces and a large public open space, with a combined area of circa 11,855sqm and 97% of the area achieves compliance. In summary the scheme achieves a high compliance level with the BRE guidelines and future residents will also benefit from the large well-lit open spaces included in the proposal.”

7.9 Construction Management Plan

A preliminary Construction Management Plan (CMP) has been prepared by Waterman Moylan Consulting Engineers. This details how the construction phase will be managed with minimal impacts on the environment or the surrounding community.

We confirm that a fully comprehensive Construction Management Plan to implement the requirements of the preliminary Construction Management Plan will be submitted to the Planning Authority for its approval in advance of any works commencing on site, should the Planning Authority grant permission for the proposed development.

7.10 Waste Management Plans

A Resource Waste Management Plan, prepared by Enviroguide Consulting Ltd, is enclosed with this application. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection and

transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

An Operational Waste Management Plan has also been prepared by Enviroguide Consulting Ltd and is enclosed with the submission. This provides details of how waste produced during the operation of the proposed development will be disposed of and treated in accordance with the relevant guidance for same.

Both documents are included as appendices to the EIAR Chapter on Waste, also prepared by Enviroguide Consulting Ltd.

7.11 Energy Statement

An Energy Analysis Report, prepared by Waterman Moylan Consulting Engineers, is enclosed with this application. This analysis determined an energy and servicing strategy to enable compliance with the relevant standards.

7.12 Public Lighting

We refer the Planning Authority to the Public Lighting Layout Plan, prepared by Sabre Lighting Consultants. This should be read in conjunction with the Outdoor Lighting Report, also prepared by Sabre Lighting Consultants. The public lighting proposals have been designed with due regard to public safety and the creation of welcoming streets and spaces. The public lighting strikes the balance of ensuring public safety at key pedestrian access points, while minimising the impact of artificial lighting on ecology in the area.

7.13 Noise Assessment

We refer the Planning Authority to Chapter 12 – Air (Noise & Vibration) of the enclosed EIAR, prepared by Wave Dynamics Limited.

The applicant confirms that the noise mitigation measures set out in the assessment for the proposed development will be adhered to.

7.14 Archaeological Assessment

We refer the Planning Authority to Chapter 17- Cultural Heritage - (Archaeology and Architectural Heritage) of the enclosed EIAR, prepared by Courtney Deery Heritage Consultancy Ltd.

The applicant confirms that the archaeological mitigation measures set out in the assessment for the proposed development will be adhered to.

8 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

Please refer to **Appendix A** for detailed response to National and Regional Planning Policy, as well as Section 28 Ministerial Guidelines.

We would highlight that the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) replaces Sustainable Residential Development in Urban Areas Guidelines (2009).

The proposed development meets the Specific Planning Policy Requirements (SPPRs) of the Ministerial Guidelines and is otherwise also consistent with the Fingal Development Plan 2023-2029 and the Kellystown Local Area Plan.

9 LOCAL STATUTORY PLANNING CONTEXT – STATEMENT OF CONSISTENCY

Section 8.1 below identifies the relevant planning policy context for the proposed development at Kellystown, as provided by the **Fingal County Development Plan 2023 – 2029**.

We refer the Planning Authority to **Section 9** of this Report for further assessment of the consistency of the proposed development with the planning objectives of the **Kellystown Local Area Plan 2021**.

9.1 Fingal County Development Plan 2023-2029

The Fingal County Development Plan 2023-2029 (the “Development Plan”) came into effect on 5 April 2023 and is the statutory land-use plan governing the subject lands at this time.

This Statement of Consistency is intended to provide the Planning Authority with adequate comfort that the provisions of the Statutory Development Plan have been duly taken into account in the proposed scheme.

In completing this exercise, we have compiled a relevant List of Objectives and quoted the text in italics where appropriate, for ease of reference. We then provide an explanation of how the proposed development is consistent with each of the relevant Objectives, in turn.

9.1.1 Land Use Zoning

The application site is subject to the Zoning Objective “RA – Residential Area”, as part of the wider new residential neighbourhood development planned for Kellystown.

Zoning objective ‘RA – Residential Area’ seeks to:

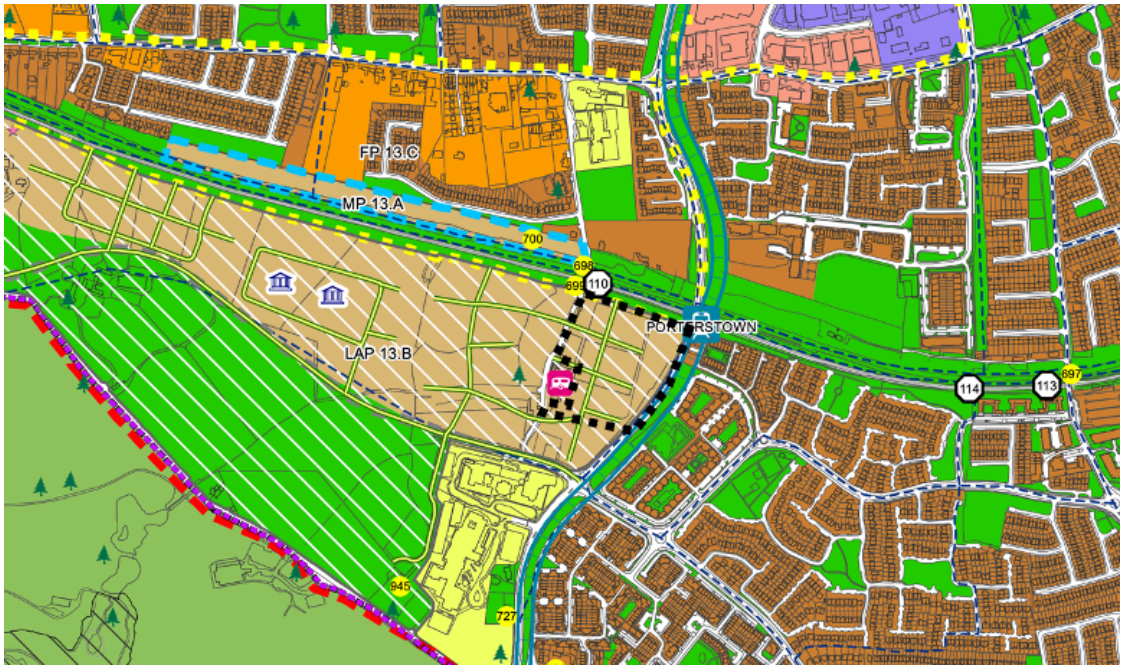
“Provide for new residential community subject to the provision of the necessary social and physical infrastructure.”

The vision of this zoning objective is to:

“Ensure the provision of high quality environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.”

The Development Plan confirms that residential uses are ‘permissible’ under the RA zoning objective.

We note that the application red line spurs slightly to the east, as requested at pre-planning stage by the Planning Authority, in order to provide pedestrian and cycle linkage to existing residential development at Riverwood Square, east of the Dr Troy Bridge/Diswellstown Road overpass.



Zoning Objectives

	CI - Community Infrastructure	Provide for and protect civic, religious, community, education, health care and social infrastructure
	OS - Open Space	Preserve and provide for open space and recreational amenities
	RA - Residential Area	Provide for new residential communities subject to the provision of the necessary social and physical infrastructure

Specific Objectives

LAP 13.A	Subject to Local Area Plan
	Indicative LAP Walking / Cycle Routes
89	Local Objective Points
941	Protected Structures
★	Sites and Monuments Record
	Light Rail Stop
	Proposed School
	Traveller Accommodation
	Protect & Preserve Trees, Woodlands and Hedgerows
	Light Rail Corridor

Figure 8: Extract from Blanchardstown South- Sheet 13, Fingal County Development Plan, 2023 – 2029, with application site outlined in black dashed line (SLA overlay). See Site Location Map prepared by O’Mahony Pike Architects for exact site boundary.

9.1.2 Map Objectives

9.1.2.1 Subject to Local Area Plan (LAP)

The land is subject of the Kellystown LAP (see Section 9, below, for further discussion).

9.1.2.2 Indicative LAP Walking / Cycle Routes

Indicative walking / cycle routes are shown, reflecting the site layout provisions of the Kellystown LAP (see Section 9, below, for further discussion).

9.1.2.3 Traveller Accommodation

The site adjoins St Brigid's Traveller Accommodation. We refer to the enclosed Architectural Design Statement which outlines how this has been considered in the design process.

9.1.2.4 Built Heritage

There are no Protected Structures or Monuments within the site. However, there are several protected structures in the vicinity, to the north west of the site, namely:

- **RPS 0699 Keepers Cottage:** A cottage associated with the development and maintenance of the railway. The cottage does not directly adjoin the subject site.
- **RPS 0698 Kennan Bridge:** A narrow stone bridge that crosses the Royal Canal. The bridge does not directly adjoin the subject site.
- **RPS 0700 Former School House:** The structure is visible over the trees that line the railway and Royal Canal. The subject site does not directly adjoin the protected structure.

We refer the Planning Authority to enclosed Architectural Design Statement prepared by O'Mahony Pike Architecture and Landscape and Visual Impact Assessment prepared by Doyle + O'Troithigh Landscape Architects which consider the reasonable protection of these structures in the context of the visual and heritage impact of the the proposed development.

The potential visual impact of the proposed development on the protected structures is further assessed in EIAR Chapter Landscape and Visual Impact Assessment, by Doyle + O'Troithigh Landscape Architects where it is ultimately concluded that the proposal will not impact on the protected structures in the vicinity of the site.

9.1.2.5 Natural Heritage

There are no tree preservation designations within the site.

9.1.2.6 Schools

Sites identified for future school development are identified further west of the site, within the 'Central Development Area' of the Kellystown LAP.

9.1.2.7 Local Objective 110

Appendix 8 of the Development Plan contains a list of the Map Based Local Objectives.

Local Objective 110, adjoining the application site at the area of the existing Porterstown Road level crossing to the north west, seeks to:

"Ensure pedestrian and cyclist connectivity is provided across the canal and rail line at this location"

We discuss how the proposed development facilitates the DART+ West pedestrian and cycle bridge connection, which lands within the north western corner of the application site, in relation to compliance with **DA 1.9** of the Kellystown LAP, in Section 9 of this report (below).

We refer also to pp.10-11 of the O'Mahony Pike Architects Design Statement that accompanies this application, for further description.

9.1.2.8 Porterstown Light Rail Stop

A route for a light rail corridor and a Porterstown Light Rail Stop are identified, aligned with the Dr Troy Bridge / Diswellstown Overpass.

Metro West has been excluded from the National Transport Authority's Greater Dublin Area Transport Strategy since 2016. The NTA's *Greater Dublin Area Transport Strategy 2022-2042* identifies the potential public transport projects up to 2042. While it provides for DART+West expansion, no other rail or light rail proposals serving the Blanchardstown area are planned before 2042. We would highlight that the Strategy does not contain any proposal for a future station (neither light rail nor heavy rail) at Porterstown or a light rail line along Diswellstown Road.

We discuss in Section 9 of this report (below) how the proposed development facilitates DART+ West in the vicinity of the Porterstown Road, in relation to **DA 1.9** of the Kellystown LAP. However, would note also that the DART+ West proposals do not include provision for a new Porterstown rail station.

Notwithstanding the above, we refer to Section 9 for further discussion on how the proposed development is consistent with Objective **DA 1.8** of the Kellystown LAP, which seeks to reserve the area of the potential future transport node at Porterstown.

9.1.3 Transport and Mobility

We refer to the enclosed Engineering Assessment Report and Traffic and Transportation Assessment, prepared by Waterman Moylan Consulting Engineers, which describes the roads proposals and internal road, pedestrian and cycle network.

This document also sets out how the proposed development complies with the Kellystown LAP transportation and movement strategy objectives.

It includes a statement of consistency with DMURS.

9.1.3.1 Site Categorisation

Since the adoption of the Development Plan, the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (2024) was published. In accordance with the provisions of Section 34 of the Act, the planning authority is required to have regard to the policies and objectives of these Ministerial Guidelines and to apply the Specific Planning Policy Requirements (SPPRs) contained therein.

Within the Metropolitan 'Dublin & Suburbs' area, the Guidelines define 'Suburban/Urban Extension Suburban' areas as "*lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development*". Kellystown is arguably an urban extension area on the western edge of the existing built up Dublin suburban footprint.

In order to more consistently apply various development standards (density, car parking, etc) the Guidelines provides further (non-exhaustive) definitions of site accessibility (see Table 3.8 extract below). The application site arguably meets the following characteristics of an 'Accessible Location'

Table 3.8: Accessibility

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

The nearest rail station to the site is at Coolmine, within c.1km walking distance via Royal Canal Way.



Figure 9: Site Accessibility - Extract from Design Statement prepared by O'Mahony Pike Architecture

The nearest Dublin Bus stop to the site is c. 450m (5 minute walk), which is served by routes 37 & 70n. The no.37 service has a frequency of 5-10 minutes.

9.1.3.2 Car Parking

Section 14.17.7 of the Development Plan identifies the car parking standards for different land uses.

However, **SPPR 3** of the Compact Settlement Guidelines, relating to car parking, requires that the categorisation of the site (City Centre, Urban Neighbourhood, **Accessible**, Intermediate and Peripheral) should form the basis for the approach and provision of car parking for the proposed development.

As identified above, the application site may be identified as an 'Accessible' site. In accordance with SPPR 3, car parking at such locations should be substantially reduced. The maximum rate of car parking provision for residential development shall be 1.5no. spaces per dwelling. The proposed development proposes at total of 241no. spaces, equating to 0.8 spaces per dwellings, well below the maximum quantum.

Acknowledging that the SPPRs contained within the Guidelines will supersede any conflicting provision of the current Development Plan, it is submitted that the proposed development is appropriately consistent with SPPR3.

We refer the Planning Authority to Appendix A for further detail on compliance with the Compact Settlement Guidelines in respect to car parking provision.

Accessible Car Parking

Within the Development Plan, no specific provision for disabled car parking spaces is identified. Notwithstanding this, the development proposes 10no. accessible car parking spaces that are distributed throughout the development.

Motorcycle Parking

Section 14.17.9 of the Development Plan requires that:

*“Parking spaces should be provided on the basis of **one motorcycle parking bay per 10 car parking spaces provided for non-residential developments and apartment developments**. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements. Where parking is provided within streets and spaces drop-kerbs should be provided to facilitate access to motorcycle parking bays.”*

It is proposed to provide 24no. motorcycle parking spaces, in accordance with the above requirement.

Electric Vehicle Parking

Section 14.17.10 of the Development Plan encourages the use of Electric Vehicles, stating that new residential development shall provide the following minimum standards for EV charging points and infrastructure ancillary to the proposed car parking:

*“All multi-unit residential developments shall incorporate **EV charging points at 20% of the proposed parking spaces and appropriate infrastructure (e.g. ducting)** to allow for future fit out of a charging point at all parking spaces.*

Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System. EV parking spaces for accessible spaces should also be included in the development where these exist.”

As confirmed within the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers, 48no. electric vehicle parking spaces are distributed throughout the development, representing 20% of the total number of proposed car parking spaces. Appropriate ducting and infrastructure to allow for future fit out of a charging point at all parking spaces will be provided.

9.1.3.3 Bicycle Parking

Section 14.17.2 of the Development Plan requires the provision of high quality, safe, secure and convenient bicycle parking, as is essential to support sustainable transport including cycling, walking and public transport.

Table 14.17, which identifies the bicycle parking standards, is reflective of new policy and environmental context of the Development Plan, including consolidation of development, increased high quality cycling infrastructure and carbon reduction targets.

Table 14.17: Bicycle Parking Standards

Land Use Category	Minimum Bicycle Parking Standards	
	Long-Stay	Short-Stay
Residential (1–2 Bedroom)	1, plus 1 per bedroom	0.5 per unit (for apartment blocks only)
Residential (3+ Bedroom)	2, plus 1 per bedroom.	0.5 per unit (for apartment blocks only)

Figure 10: Bicycle Parking Standards, Source: Fingal County Development Plan 2023-2029

As confirmed in the Traffic and Transport Assessment, prepared by Waterman Moylan, the minimum requirement for residential cycle parking using Development Plan standards is 873no. long stay cycle spaces and 103no. short stay cycle spaces.

As illustrated within the Waterman Moylan Report, it is proposed to provide a total of 993no. cycle spaces (889no. long stay, 104no. short stay) in excess of Development Plan requirements.

Land Use	No. Units	Cycle Parking Spaces Ratio		Cycle Parking Spaces Proposed	
		Resident	Visitor	Resident	Visitor
3-bed Houses -Mid-Terrace-	38	5	0	190	
4-bed Houses -Mid-Terrace-	22	6	0	136	
1-bed Apartments / Duplex	98	2.04	1 / 2 units	200	49
2-bed Apartments / Duplex	88	3.01	1 / 2 units	265	44
3-bed Apartments / Duplex	19	5	1 / 2 units	95	9
Total resident and visitor cycle parking spaces				889	104
Total cycle parking spaces				993	

Figure 11: Proposed Cycle Parking Provision extracted from the Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers

The proposed bicycle parking provision meets the requirements of the Development Plan standards, Compact Settlement Guidelines (SPPR 4) Apartment Design Guidelines (2023), and Cycle Design Manual (2023) as demonstrated in Appendix A of this report.

9.1.4 Residential Development Management

9.1.4.1 Residential Unit Mix

The proposed development provides a dwelling mix of:

- 35no. 4 bed houses
- 62no. 3bed houses
- 19no. 3bed duplex units
- 7no. 2 bed duplex units
- 81no. 2bed apartments
- 98no. 1bed apartments

There is no specific unit mix requirement identified in the Development Plan.

We can confirm that the proposed unit mix is consistent with SPPR1 of the Apartment Design Standards, which requires that no more that 50% 1-bed units should be provided.

We refer to the Schedule of Accommodation, prepared by OMP Architects, that accompanies this submission for further details of unit mix for the proposed scheme.

9.1.4.2 Privacy/Separation Distances

Objective **DMS023**

“A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over three-storeys in height, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.”

However, **SPPR 1** of the Compact Settlements Guidelines (2024), states:

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

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.”

The proposed development maintains a minimum separation distance of 16m between opposing windows of habitable rooms above ground floor, to the rear and side as appropriate, throughout the scheme. This is consistent with SPPR1 of the Compact Settlement Guidelines, which supersedes conflicting Objective DMS023 of the Development Plan.

We refer the Planning Authority to the accompanying Site Layout Plans, Prepared by O’Mahony Pike Architects for further detail.

9.1.4.3 Private Open Space

In terms of the proposed **apartments**, Section 14.7.6 of the Development Plan requires that apartments shall have private amenity space in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. The Development Plan acknowledges the minimum areas for private amenity as set out in Appendix 1 of the Apartment Design Guidelines (2023), detailed below:

Studio	4 sq m
One bedroom	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

Figure 11: Private Open Space, Source: Sustainable Urban Housing: Design Standards for New Apartments (2023)

We refer the Planning Authority to the enclosed floor plans and accompanying Housing Quality Assessment, prepared by O’Mahony Pike Architects. These confirm that the private open space for the proposed dwellings meets and/or exceeds the Development Plan Standards, which in turn are in line with the Apartment Guidelines (2023).

Section 14.8.3 of the Development Plan sets out the minimum private open space quantum for **houses**. However, SPPR2 of the Compact Settlements Guidelines (2024), requires the following revised minimum private open space standards, in the interests of achieving sustainable development in urban areas:

- 1 bed house 20 sq.m
- 2 bed house 30 sq.m
- 3 bed house 40 sq.m
- 4 bed + house 50 sq.m

As SPPR2 supersedes any conflicting provisions in current Development Plan, we can confirm that the proposed development is consistent with the SPPR2 requirements for private open space for the proposed houses. This is further illustrated in the enclosed floor plans and accompanying Housing Quality Assessment, prepared by O'Mahony Pike Architects.

9.1.4.4 Communal Amenity Space

Section 14.7.7 of the Development Plan confirms that Communal Open Space, must be in accordance with the quantum required by Appendix 1 of the Apartment Design Guidelines, and that it must be of high-quality design, accessible, overlooked and conveniently located for use of residents. Particular attention should be paid to ensuring such areas benefit from adequate daylight and sunlight throughout the year.

The minimum communal amenity space quantum set out in Appendix 1 of the Apartment Guidelines (2023) is detailed below:

Studio	4 sq m
One bedrooms	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

Figure 12: Communal Amenity Space, Source: Sustainable Urban Housing: Design Standards for New Apartments (2023)

Having regard to the standards above, a minimum requirement of 1,257 sq m of Communal Open Space applies to the proposed development. As confirmed by the Schedule of Accommodation, prepared by O'Mahony Pike Architects, **c.1,889 sqm** of communal amenity space is proposed, well in excess of the minimum standards.

9.1.4.5 Public Open Space

In terms of public open space requirements, we note that Objective CIO5038 states,

"Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms."

The proposed development of 302no. dwellings comprises:

- 35no. 4 bed houses (35 x 3.5 persons = 122.5)
- 62no. 3bed houses (62 x 3.5 persons = 217)
- 19no. 3bed duplex units (19 x 3.5 persons = 66.5)
- 7no. 2 bed duplex units (7 x 1.5 persons = 10.5)
- 81no. 2bed apartments (81 x 1.5 persons = 121.5)
- 98no. 1bed apartments (98 x 1.5 persons = 147)

The expected occupancy above results in a population equivalent of **685 people**. This would give a pro-rata public open space area requirement of min. **17,125sqm sqm**.

The quantum of Public Open Space proposed amounts to:

- **Class 2 POS = 0.8,231ha (8,231 m²)**
- **Class 1 POS = 0.4075ha (4,075m²)**

In terms of Class 1 public open space, the public park permitted as part of the Kellystown SHD scheme (ABP-312318-21, as amended by LRD0034-S3) amounts to c. 27,869sqm. This is in excess of the requirements for the consented SHD dwellings, by c. 7,494sqm. As c. 3,419sqm of this has been allocated to the concurrent Luttrellstown Gate Phase 2 scheme (99no. dwellings), the remaining c. 4,075sqm is allocated to the subject scheme in terms of Class 1 open space provision.

8,231sqm of Class 2 Open Space is provided within the gross site area, resulting in a public open space shortfall of c.4,819sqm.

A total of c. 6,455sqm (16.3%) of class 2 public open space is provided within the net site area.

We would therefore highlight, that in addition to the Class 1 and Class 2 public open space areas identified above, there is also a significant quantity of 'Environmental Open Space' proposed within the scheme, which will be of benefit to the new residential neighbourhood. We consider that these spaces further enhance the visual and natural amenity in this area.

The Kellystown LAP is clear in that Class 1 POS is provided to the south of the Kellytown Link Road. The Applicant has facilitated delivery of the schools, burial grounds, new sportsground for St. Mochtas and c. 2.8 Ha of Class 1 public parkland (under Luttrellstown Gate Phase 1) on the full extent of lands under their ownership to the south of the Kellystown Link Road. There is a considerable swathe of additional Public Open Space to be delivered further west including an 8 Ha public park, urban farm, off-leash dog park and additional green and blue corridors. The Applicant is in continuing and active negotiations with the adjoining third party landowner with a view to acquiring both the Central Development Area lands to the north of the Kellystown Link Road and a substantial swathe of Open Space zoned lands to the south of the Kellystown Link Road and we would respectfully submit that additional public open space lands will be forthcoming as will the ultimate realisation of the full development vision for the Kellystown LAP lands.

9.1.4.6 Community and Social Infrastructure

Objective DMS078 states that,

“Planning applications for large scale residential and mixed-use developments, of 50 or more residential units, shall include a Community and Social Infrastructure Audit. This audit shall assess the provision of community and social infrastructure within the vicinity of the site and shall identify existing shortcomings in terms of these facilities and assess whether there is a need to provide additional facilities to cater for the proposed development.”

We refer to the enclosed Community and Social Infrastructure Audit prepared by Stephen Little & Associates in compliance with this objective.

10 KELLYSTOWN LOCAL AREA PLAN 2021

The application site lies within the Eastern Development Area (DA1) of the Kellystown Local Area Plan.

10.1.1 Eastern Development Area (DA1) – Development Objectives

The proposed development is consistent with the development characteristics and quantum of residential development envisaged for the Eastern Development Area (DA1) by the Kellystown LAP, as identified in the Table below: –

	DA1	Proposed & Permitted Developments
Density range (net)	50-75	64 units per hectare
Approximate unit range	571-857	775no. dwellings
Community Infrastructure	Green Routes	Green Routes and Class 2 active open space facilities provided. Public Park (2.1ha) permitted to south.

	Note also separate application for relocation of St Mochtas to Open Space lands is currently at FI Stage.
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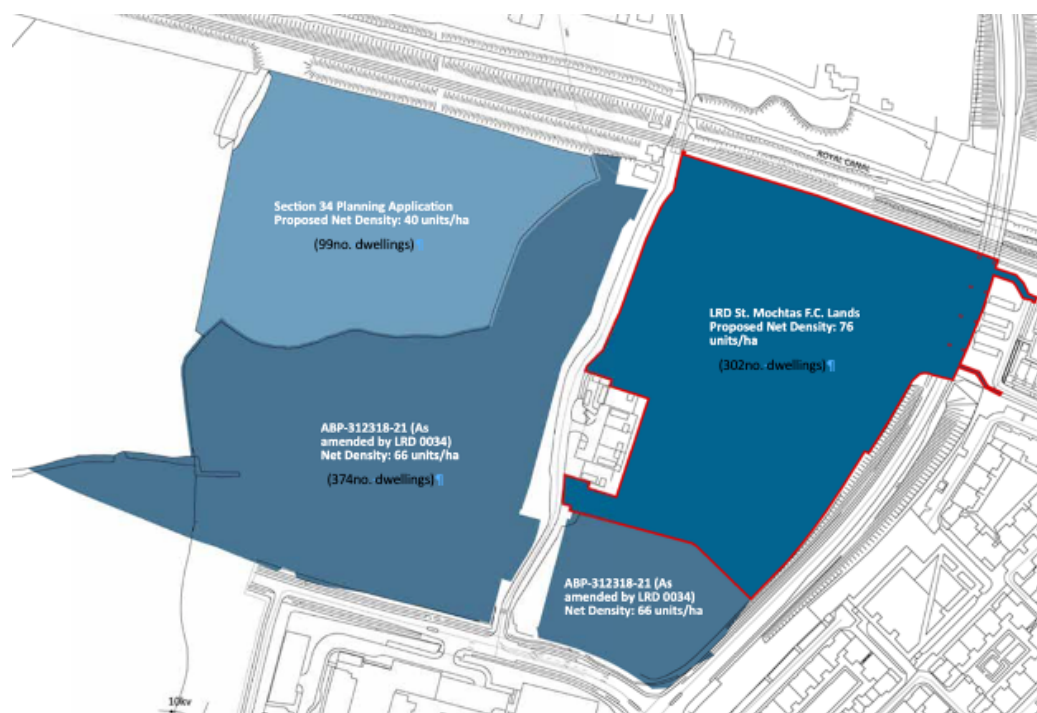


Figure 13: Extract from Architectural Design Statement prepared by O’Mahony Pike Architecture identifying permitted and proposed applications within the applicants landholding.

The proposed development has been designed having regard to the Indicative Layout Plan for the Eastern Development Area (Figure 6.3 of the Kellystown LAP).

The proposed development seeks to provide 302no. dwellings, in a mix of houses, duplexes and apartments ranging from 1 – 7 storeys in height, within a site area of c. 4.38 ha (gross) / c.3.96 (net). This yields a net residential density of 76no. dwellings per hectare. It is sequentially appropriate for the higher density to be located closest to the transport node (Coolmine Rail Station to the east) and decrease with distance.

Building height along the northern and eastern edges of the application site vary in height from 3 - 7 storeys. A 7-storey building is located in the northeast corner of the site, corresponding with the ‘Gateway’ building location in the Kellystown LAP site plan.

Another 7-storey element is located in the southeast corner, adjacent to Block A - a permitted 6-8 storey building - in the Luttrellstown Gate Phase 1 scheme (LRD0034-S3).

The proposed building height strategy seeks to provide a strong urban edge to boundary created by the Dr Troy Bridge - Diswellstown Road Overpass. It also provides a strong urban edge and passive surveillance to the railway and the Royal Canal corridor. Elsewhere it ensures an urban edge to the public realm and overlooking of public open space. The proposed 3-storey duplex buildings creates a comfortable urban block with buffering communal open space to the traveller accommodation site, which receives southern and western light..

We refer the Planning Authority to Appendix A of this report which further discusses and confirms compliance of the proposed building heights with the ‘Building Urban Development and Building Heights – Guidelines for Planning Authorities’ (2018).

10.1.2 Key Objectives DA1

The below sets out how the proposed development addresses the relevant Key Objectives for DA1, pertaining to this site:

Objective DA 1.1

*“Provide for the **relocation of St. Mochta’s Football Club** to an appropriate site in the Open Space Area in the southern portion of the LAP land bank in close proximity to the existing schools campus. The relocated facilities shall be constructed and finished on site by the developer to a suitable standard to be agreed with Fingal County Council prior to the re-development of the existing St. Mochta’s Football Club site”*

The proposed development of this application site triggers the relocation of the existing St Mochta’s FC grounds.

In accordance with **Key Objective DA 1.1**, it may be noted that Castlethorn Developments Luttrellstown Limited made a planning application (FW25A/0033E) on 31 January 2025, which seeks permission for the relocation of St Mochta’s FC grounds to the ‘Open Space’ zoned lands south of Kellystown Link Road. On foot of a recent Further Information stage, a decision on this application is due 23 June 2025.



Figure 14: Extract from Fingal County Development Plan land use zoning map, showing relocation of St Mochta’s FC under live planning application FW25A/0033E (SLA overlay of LRD site and FW25A/0033E site)

Objective DA 1.2

“Provide for the upgrade of the existing Traveller accommodation site and its services;

Whilst not included within the red line, the subject site is bounded to the west by St Brigids Lawn Traveller Accomodation.

The duplexes are arranged so as to create an urban block to enclose the western boundary with St. Brigids Traveller Accomodation, and provide buffering communal open space.

The proposed site layout would facilitate any future redevelopment of the Traveller Accomodation site, should that need arise in the future.

Objective DA 1.3 seeks to promote and encourage increased levels of pedestrian and cycle connectivity between the subject lands and the surrounding areas through the provision of a new pedestrian and cyclist links.

The proposed road network connects with the permitted looped access road in the Kellystown development to the west, as per the requirements of the LAP to have only a single new vehicular road

access from the Kellystown Link Road. See O'Mahony Pike Architects Design Statement (p.38) for further illustration.

The greenway along the northern boundary facilitates the connection of the permitted DART+ West pedestrian and cycle bridge within the application site, and will connect with other walking and cycling routes through the site and onwards to adjoining development lands. See O'Mahony Pike Architects Design Statement (pp.10-11) for further illustration of connection of permitted DART+ bridge into the northern edge of the site.

The northern and eastern green areas will facilitate a continuation of the 4m cycle and pedestrian route that was permitted under ABP-312318-21, which accords with the site design parameters of the LAP. . See O'Mahony Pike Architects Design Statement (p.39) for further illustration.

In addition, a proposed green corridor along the western site boundary, when combined with the permitted green spaces on the eastern side of the Porterstown Road (Luttrellstown Gate Phase 1), has the potential to create a generous green corridor of 25-30m in width. This will be further enhanced with the future closure of the Porterstown Road to vehicular traffic, when permitted DART+West is implemented and it becomes a primarily pedestrian/cycle route.

Connections and tie ins with the permitted SHD scheme are demonstrated within the enclosed Architectural Design Statement (pp.36-39) prepared by O'Mahony Pike Architects.

Objective DA 1.4 seeks to Provide for a mixed typology of high quality residential units including apartments, duplexes and townhouses;

The proposed development seeks permission for the construction of 302no. residential units, in a varied mix of apartment, duplex and apartment units, providing 1-bed, 2-bed, 3-bed and 4-bed dwellings for a range of household types. The proposed unit mix comprises:

- 35no. 4 bed houses
- 62no. 3bed houses
- 19no. 3bed duplex units
- 7no. 2 bed duplex units
- 81no. 2bed apartments
- 98no. 1bed apartments

The proposed development, together with the concurrent planning application for the Luttrellstown Gate Phase 2 residential development (99no. dwellings) and the permitted Luttrellstown Gate Phase 1 development (SHD ABP-312318-21, as amended by LRD0034-S3) to the south and west, will deliver a total of 775no. dwellings, in a mix of house, duplex and apartment unit types.

A split of approximately 40:60 is provided, with a greater proportion of apartment / duplex type units proposed. Together, these developments offer a well-balanced mix of unit sizes, with a total of 198no. 1- bedroom units, 247no. 2-bedroom units, 270no. 3-bedroom units and 60-no. 4-bedroom units to be provided within the Eastern Development Area

Objective DA 1.5

“Existing trees, hedgerows, field boundaries shall be protected and retained as far as is practicable in any development proposal. Existing hedgerows shall incorporate blue/green corridors and swale corridors for the protection of biodiversity and for SuDS”

We refer the Planning Authority to the enclosed Landscape Plans prepared by Doyle O'Troithigh Landscape Architecture.

Existing trees, hedgerows, field boundaries have been protected and retained allowing naturally for breaks to accommodate the required vehicular, pedestrian/cycle and service outfalls with the adjoining Phase 1 development, as envisaged under the LAP masterplan for the area.

Objective DA 1.6

“One vehicular access to the site will be from the new Kellystown Link Road, with all internal road networks to be home zones or local access roads only. An emergency access will also be required”

Vehicular access to the proposed development is provided via the single site entrance from the Kellystown Link Road and the extended road network permitted as part of the Kellystown SHD scheme, under ABP-312318-21, as amended by Reg. Ref. LRD0034-S3.

The proposed internal road, bicycle and footpath network at the application site is consistent with the Kellystown LAP site plan. It delivers connectivity with the permitted development lands to the south and provides local access/homezones in accordance with DMURS and the Kellystown LAP.

Objective DA 1.7

*“The access road through the Development Area shall provide for **street trees** in appropriately designed tree pits and grass margins”*

We refer the Planning Authority to the enclosed Landscape Plans prepared by Doyle O'Troithigh Landscape Architecture. This confirms,

“Specific trees have been selected for the formal streetscapes within the scheme. These are all fastigate or upright in form with a narrow canopy to avoid interference with landscape elements such as lighting, vehicular infrastructure, and the built environment. The species selected are considered ‘tried and tested’ in terms of streetscape design; however, they have also been selected for their seasonal interest.”

Objective DA 1.8

Provide for temporary land uses to the north-east portion of land in order to preserve the land for a future transport node at this location;

Metro West has been excluded from the National Transport Authority's Greater Dublin Area Transport Strategy since 2016.

The Greater Dublin Area Transport Strategy 2022 – 2042 by the National Transport Authority provides an outline of potential public transport projects up to 2042. It provides for DART+West expansion, but no other rail or light rail proposal serving the Blanchardstown area before 2042. The Strategy does not contain proposals for a future station (neither light rail nor heavy rail) at Porterstown or a light rail line along Diswellstown Road.

However, the Local Area Plan further identifies that *“There is a possibility that a portion of the land at the extreme north-eastern part of the site (next to Diswellstown Road) may be the location of a future train station and/or future Metro West transport node. As such, the land use in this area must be of a temporary nature, of a material which do not require strong foundations and which can be removed without causing any impact on the surrounding developed land.”*

While there appears to be no support at strategic level for the development of a train station or node at Porterstown, or any plans to extend a rail service over and above DART+ West to the Dublin 15 lands before 2042, the proposed development is consistent with the provision of the Kellystown LAP object DA 1.8.

In this respect, within the application site the north eastern corner comprises public open space lands. This does not require foundations and is reversible should the need arise to facilitate a transport node in the future. The proposed open space use is consistent with the 'RA' land use zoning of the County

Development Plan and with the Kellystown LAP indicative layout plan (Fig 6.3) for the Eastern Development Area.

We refer to the enclosed architectural and landscape plans which show the proposed public open space situated in this location. In the event that the potential for a new rail/light rail station at Porterstown became a real prospect, the proposed layout and finish of the space can be amended to form a more formal threshold space adjacent to the rail station. Please refer to the Landscape Design Report prepared by Doyle O'Troithigh Landscape Architecture for further detail in this regard.

Objective DA 1.9

The Eastern Development Area shall incorporate all new Irish Rail infrastructure resulting from any amendments to the level crossing.

The proposed green route along the northern site boundary facilitates the connection of the permitted DART+ West pedestrian and cycle bridge within the application site. This will connect with other walking and cycling routes through the site and onwards to adjoining development lands.

See O'Mahony Pike Architects Design Statement (pp.10-11) for further illustration of connection of permitted DART+ bridge into the northern edge of the site.

Objective DA 1.10

Provide for a gateway building of high-quality design, architectural expression and appropriate height to the northeast block of the development area;

The Kellystown Local Area Plan identifies a 'Gateway Building' in the northeastern corner of the site.

Block D is an apartment building of up to 7-storeys, located in the northeastern corner of the application site designated for a gateway building. The 7-storey building bookends the urban block and addresses this prominent corner, which is very visible from the Diswellstown Road Overpass.

Block D steps in height, from 5 storeys on its western side, to 7 storeys on its northeastern corner. This increase in height is appropriate, as the building addresses a significant public open space. The larger 6-7 storey part of Block D has a brick finish, and the smaller, 5 storey part has a render finish. It is proposed to use a warm, brown brick on Block D, similar to the one that has been used on the 3 storey houses that demarcate the entrance to Kellystown Phase 1.

We refer to the enclosed plans and particular prepared by O'Mahony Pike Architects for further detail.

Objective DA 1.12

"Provide appropriate drainage infrastructure in accordance with the requirements of the Fingal County Council Drainage Department and as set out in this LAP"

We refer the Planning Authority to the accompanying Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers, for further details in relation to this.

Drainage infrastructure is in accordance with the requirement of the Fingal County Council Drainage Department and the detail provided within the Kellystown Local Area Plan.

Objective DA 1.14

"Ensure the preservation of trees and hedgerows as set out in Section 8 of the LAP"

We refer the Planning Authority to the enclosed Landscape Plans prepared by Doyle O'Troithigh Landscape Architecture.

Existing trees, hedgerows, field boundaries have been protected and retained allowing naturally for breaks to accommodate the required vehicular, pedestrian/cycle and service outfalls with the adjoining Phase 1 development, as envisaged under the LAP masterplan for the area.

Objective DA 1.15

*“The **upgrading of the Kellystown Road/Diswellstown Road junction** shall be carried out in Phase 1 with the timeframe and specifications to be agreed in advance with the Planning Authority”*

This objective is met by the consented Luttrellstown Gate Phase 1 (SHD) scheme and does not change in the current application.

10.1.3 Climate Change and Environmental Sustainability

The proposed development incorporates sustainability measures in line with Objective 4.1 of the LAP, through:

- promoting active travel (walking and cycling) by providing for safe, attractive pedestrian and cycling routes;
- provision of electric vehicle charge points;
- promoting the retention of existing trees and hedgerows where possible and providing for new planting to augment or replace existing, ensuring that the planting has maximum biodiversity value;
- maximisation of natural daylight; and,
- careful consideration of building orientation, form, massing and fenestration to make the most of passive solar gain for heating and cooling.

An Energy Statement has been prepared in support of the proposed development, by Waterman Moylan Consulting Engineers, and is enclosed.

An Environmental Impact Assessment Report (EIAR) has also been prepared, assessing key topics including climate change, air quality and sunlight & daylight environmental effects arising from the proposed development.

10.1.4 Detailed Design Statement

The LAP includes:

*“**Objective 6.3** A detailed Design Statement for all developments shall accompany all planning applications within the LAP boundary, the components of which shall be informed by the requirements of this LAP.”*

We refer the Planning Authority to the enclosed Architectural Design Statement prepared by O’Mahony Pike Architecture, addressing the proposed development and its compliance with the Kellystown Local Area Plan, Development Plan and other relevant guidelines.

10.2 Movement and Transport Strategy

The proposed development will ultimately be connected to the permitted Kellystown Link Road ABP-312318-21, as amended by Reg. Ref. LRD0034-S3) and the existing Diswellstown Local Road, via its proposed internal road network. The proposed road network also connects it to the consented development lands to the east and south.

A 4.0m wide pedestrian and cycle pathway is proposed along the eastern and northern edge of the application site. This pathway is a continuation of the pathway permitted as part of the Kellystown SHD scheme to the east (ABP-312318-21, as amended by LRD0034-S3). It is anticipated that future planning application(s) for development of lands to the west of the application site will continue this pathway westwards, towards the central district of Kellystown.

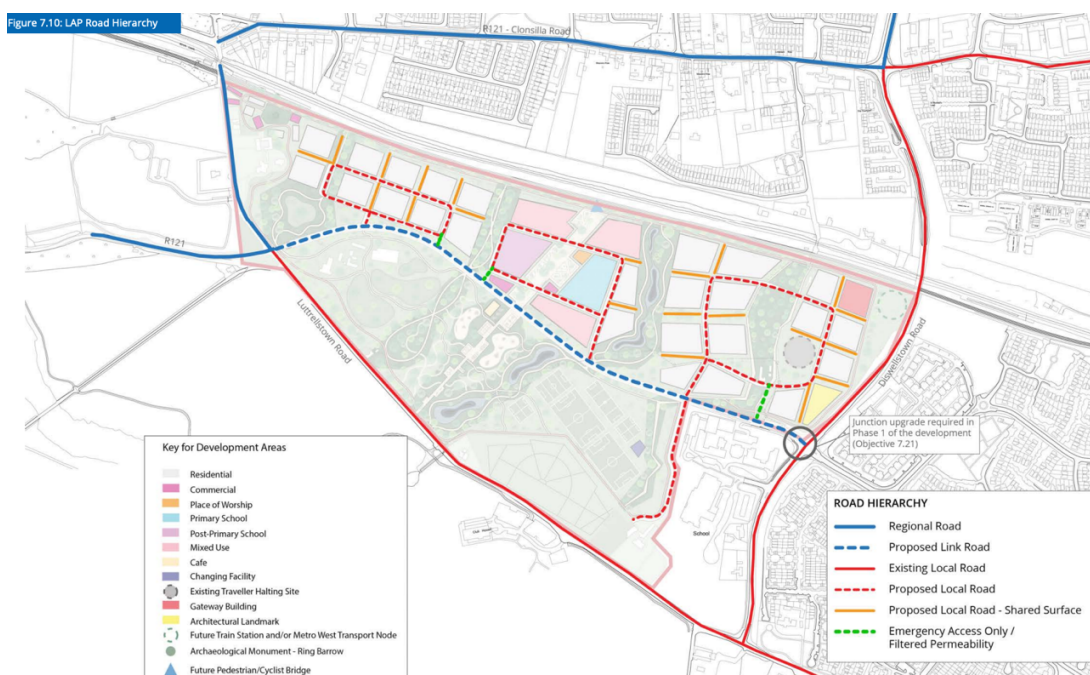


Figure 14: Extract from Figure 7.11: LAP Walking and Cycling Network extracted from the Kellystown Local Area Plan

The following movement and transport objectives of the LAP are applicable to the proposed development

“Objective 7.1 Ensure the streets and roads within the LAP are designed as per Design Manual for Urban Roads and Streets and the National Cycle Manual to function as urban streets and to accommodate multi-modal movements, create a sense of place and contribute to the public realm”

“Objective 7.4: Ensure delivery of the appropriate road infrastructure in line with the LAP road hierarchy of streets to develop the lands to their full potential. The design should be in accordance with the principles outlined in the Design Manual for Roads and Streets (DMURS) and the NTA’s National Cycle Manual.”

We refer to the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers, which demonstrates that proposed roads and streets have been designed as per Design Manual for Urban Roads and Streets and the National Cycle Manual.

“Objective 7.16: Promote the provision of reduced parking standards for residential and commercial land uses.”

Section 14.17.7 of the Development Plan identifies the car parking standards for different land uses. Since the adoption of the Development Plan, Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) was published, in which, in accordance with the provisions of Section 34 of the Act, the planning authority is required to have regard to the policies and objectives of the Guidelines and to apply the specific planning policy requirements (SPPRs).

SPPR 3 of the Compact Settlement Guidelines relates to car parking. SPPR 3 identifies that the categorisation of the site (City Centre, Urban Neighbourhood, Accessible, Intermediate and Peripheral) should form the basis for the approach and provision to car parking.

The nearest Dublin Bus stop is approximately c. 450m (5 minute walk), which is served by routes 37 & 70n. The no.37 service has a frequency of 5-10 minutes. Therefore, the site may be categorised as an ‘Accessible Location’. As per SPPR 3, car parking at such locations should be substantially reduced. The maximum rate of car parking provision for residential development shall be 1.5 no. spaces per dwelling.

The proposed development proposes at total of 241no. spaces, equating to 0.8 spaces per dwellings, well below the maximum quantum.

Acknowledging that the SPPRs contained within the Guidelines will supersede any conflicting provision of the current Development Plan, the proposed development is submitted to be compliant with SPPR3. We refer the Planning Authority to Appendix A for further detail on compliance with the Compact Settlement Guidelines in respect to car parking provision.

“Objective 7.20 Provide safe and secure bicycle parking for residents in line with Fingal Development Plan Standards.”

A total of 993no. cycle parking spaces are proposed as part of the development, with 889no. long stay and 104no. short stay cycle spaces proposed. In terms of cycle storage, we note the following:

- **Houses** - Where a house has side or rear access to its private rear garden from the street, it is presumed that the residents of that house will store their bicycles in the private rear gardens. Where a house is terraced, and access to its private rear garden involves going through the internal ground floor of the house, secure bicycle parking is provided to the front of the dwelling, or within the streetscape in the vicinity of the dwelling.

Each terraced 3 bedroom house is provided with 5 no. secure long-stay bicycle spaces, and each 4 bedroom house is provided with 6 no. secure long-stay bicycle spaces. Generally, each terraced house is provided with 1 no. horizontal bicycle locker, which stores 2 bicycles, adjacent to its front door, and the balance of the long-stay bicycle parking is provided in on-street, gated bicycle stores.

- **Apartments** - In Blocks D, E & F, most long-stay bicycle parking is provided within dedicated bicycle stores located on the ground floor of those buildings. A combination of semi-vertical spaces and sheffield stand spaces is provided for each building. A bicycle repair station is provided within the internal bicycle stores in both Blocks E & D. Some longstay bicycle parking is also provided by external secure lockers, which are generally located in the narrow or shady parts of the communal open spaces. Please note that the area of the lockers is excluded from the communal open space quantum. 5% of all long-stay bicycle spaces are cargo-bicycle spaces, in line with the National Cycle Manual recommendations.

For the Block G1, G2, G3 & G4 duplexes, long-stay bicycle parking is provided in single storey bicycle store buildings that are located within their communal area.

The proposed bicycle parking provision meets the requirements of the Development Plan standards, Apartment Design Guidelines (2023), and Cycle Design Manual (2023).

“Objective 7.22: Minimise need for surface parking through innovative design and implementation of a Mobility Management Plan for all residential developments.”

A Mobility Management Plan has been prepared by Waterman Moylan Consulting Engineers and is enclosed.

10.3 Green and Blue Infrastructure (Chapter 8)

The key goals under Green and Blue infrastructure within the LAP are as follows;

- *“Retain existing treelines and hedgerows of value (defined herein) and incorporate into future development proposals.”*
- *“Improve the liveability of Kellystown by creating green links between open spaces and other key assets, such as existing and future schools; and*
- *Take advantage of the opportunities created by the requirement to incorporate SuDS features to ensure that these areas enhance the landscape quality of the area.”*

***“Objective 8.1 Promote the conservation and enhancement of biodiversity having regard to the policies and objectives of the Fingal Development Plan, the Fingal Heritage Plan and the Fingal Biodiversity Plan while allowing for appropriate development, access arrangements and recreational activity.*”**

Biodiversity within the scheme has been conserved and enhanced in accordance with the policies and objectives of the Fingal Development Plan, the Fingal Heritage Plan and the Fingal Biodiversity Plan.

We refer the enclosed Landscape Pack prepared by Doyle & O'Troithigh Landscape Architecture and Biodiversity EIAR Chapter prepared by Enviroguide Consulting.

***“Objective 8.3 Protect existing trees and hedgerows within the LAP lands which are of amenity or biodiversity value as identified on Figure 8.5.”*”**

We refer the Planning Authority to the enclosed Landscape Plans prepared by Doyle O'Troithigh Landscape Architecture.

Existing trees, hedgerows, field boundaries have been protected and retained allowing naturally for breaks to accommodate the required vehicular, pedestrian/cycle and service outfalls with the adjoining Phase 1 development, as envisaged under the LAP masterplan for the area.

***“Objective 8.3 Protect existing trees and hedgerows within the LAP lands which are of amenity or biodiversity value as identified on Figure 8.5.”*”**

We refer the Planning Authority to the enclosed Landscape Plans prepared by Doyle O'Troithigh Landscape Architecture and Arborist material prepared by The Tree File Consulting Arborists for discussion of how existing trees and hedgerow networks are protected or reinforced within the application site.

We refer to the enclosed Preliminary Ecological Appraisal of the proposed development, prepared by Enviroguide Consulting.

We refer also to the Biodiversity Chapter of the EIAR, prepared by Enviroguide Consulting

10.4 Parks, Open Space and Recreation (Chapter 9)

As per the Development Plan, the Local Area Plan requires that for all developments with a residential component, the overall standard for public open space provision is a minimum 2.5 hectares per 1,000 population. As confirmed in Section 9.1.4.5 above, the required quantum of public open space is provided, designed to a high specification.

The following objectives are applicable to the subject development.

***“Objective 9.8 All Class 1 open space generated by development proposals within the RA Residential Area zoned lands shall be provided within the OS Open Space zoned lands to the south or as agreed.”*”**

We confirm all Class 1 open space is provided within the OS Open Space zoned lands to the south.

In terms of Class 1 public open space, the public park permitted as part of the Kellystown SHD scheme (ABP-312318-21, as amended by LRD0034-S3) amounts to c. 20,978sqm. This is in excess of the requirements for the consented SHD dwellings, by c. 7,494sqm. As c. 3,419sqm of this has been

allocated to the concurrent Luttrellstown Gate Phase 2 scheme (99no. dwellings), the remaining c. 4,075sqm is allocated to the subject scheme in terms of Class 1 open space provision.

8,231sqm of Class 2 Open Space is provided within the gross site area, resulting in a public open space shortfall of c.4,819sqm.

The Kellystown LAP is clear in that Class 1 POS is provided to the south of the Kellytown Link Road. The Applicant has facilitated delivery of the schools, burial grounds, new sportsground for St. Mochtas and c. 2.8 Ha of Class 1 public parkland (under Luttrellstown Gate Phase 1) on the full extent of lands under their ownership to the south of the Kellystown Link Road. There is a considerable swathe of additional Public Open Space to be delivered further west including an 8 Ha public park, urban farm, off-leash dog park and additional green and blue corridors. The Applicant is in continuing and active negotiations with the adjoining third party landowner with a view to acquiring both the Central Development Area lands to the north of the Kellystown Link Road and a substantial swathe of Open Space zoned lands to the south of the Kellystown Link Road and we would respectfully submit that additional public open space lands will be forthcoming as will the ultimate realisation of the full development vision for the Kellystown LAP lands.

10.5 Creating Communities (Chapter 10)

The Kellystown LAP recognises the importance of successful community, with a key aim to promote and enhance community infrastructure for the emergent residential community.

“Objective 10.5 Provide a mix of high quality pocket parks, small parks and playgrounds within the Eastern (DA1) and Western Development (DA3) Areas which shall be sized and designed to Development Plan standards

The open space strategy for the proposed scheme aligns with the principles of the Kellystown LAP, with a large public open space being provided along the eastern side of the residential site. This area comprises c.6,455sqm which equates to c. 14.7% of the gross site area excluding the wayleave of the residential site. We note that this area of public open space has increased in size and width since the S247 consultation.

Although other green open spaces are provided on the northern and western sides of the residential site, these spaces have been categorised as Environmental Open Space for the purposes of this planning application. We note that the collection of green spaces that are located to the east and west of the Porterstown Road will collectively form a considerable amenity if/when vehicular use of the Porterstown Road is restricted by Fingal County Council, at some point in the future.

We note that the proposed public open space includes the area under the Diswellstown Road Overpass, and it is proposed that the space underneath the bridge would form a covered play area. Pathways extend beyond the eastern boundary of the site, specifically to connect to existing footpaths within Riverwood Square. We note that the members of the design team and FCC met on site to review the design of the area under the bridge, and to agree the locations of the proposed cycle and pedestrian connections.

“Objective 10.7 Require the provision of appropriate childcare facilities in line with national guidelines.”

We refer the Planning Authority to the enclosed Community and Social Infrastructure Audit prepared by Stephen Little and Associates.

Having regard to the requirements of the Childcare Guidelines, it is submitted that the creche on the ground floor of Block B, permitted within the Kellystown SHD scheme, has been designed with sufficient capacity to cater for the childcare space requirements of the consented Luttrellstown Gate Phase 1 scheme, subject application and concurrent Luttrellstown Gate Phase 2 scheme (99no. dwellings).

10.6 Water and Infrastructure (Chapter 11)

It is acknowledged that environmental infrastructure and utilities are an essential component of the sustainable development of Kellystown as a strategic new residential neighbourhood.

For details on sustainable water and drainage proposals, we refer the Planning Authority to the enclosed Engineering Pack prepared by Waterman Moylan Consulting Engineers.

10.7 Phasing of Development (Chapter 12)

Identified within the *Table 12.1 – Development Phasing* of the Kellystown Local Area Plan, Phase 1 – Eastern Development Area (DA1) instructs that the following element shall be provided in the first phase of development:

- ***“Relocation of St. Mochta’s Football Club to a location within OS - Open Space zoned lands, with all specifications and a programme of works to be agreed with the Planning Authority. The relocation of the Football Club will be facilitated and undertaken by the developer and works including the fitting out and completion of the sports pitches, boundary treatments, lighting, car parking, drainage and all other necessary requirements to be agreed with the local authority”***

The relocation of St. Mochta’s Football Club to the Open Space Area in the southern part of the LAP land bank, near the existing schools campus, is currently subject of a live planning application (FW25A/0033E) lodged on 31 January 2025. Where approved (decision due 23 June 2025), this development will support the emergence of the new residential neighborhood to the north of the Kellystown Link Road, in accordance with the requirements of the Kellystown LAP for the early phase of the Eastern Development Area.

- ***“Network of pedestrian and cycle links to be provided in tandem with development and not subsequent to occupation of dwellings”***

Pedestrian and cycle links are proposed throughout the application site, to connect with the permitted Kellystown SHD lands to the east and south, and providing permeability to the wider LAP area. The requirement to provide these in tandem with development is noted.

- ***“Provision of a constructed wetland/pond(s) as part of SuDS management strategy to the west of the lands and adjoining DA2 as well as water quality infrastructure. Extents to be agreed with the planning authority at pre-planning stage”***

The proposed blue and green corridor at the western edge of the Eastern Development Area is on third party lands and is outside of the control of the Applicant.

the Applicant is in discussions with the retained landowner about the acquisition of these lands and land further west and intends to develop out this linear park and adjacent western lands in due course.

- ***“Provision of wastewater facilities including pumping station as required to be delivered in tandem with new development***

A new pumping station forms part of the Kellystown SHD consent, under ABP-312318-21, as amended by Reg. Ref. LRD0034-S3.

We refer to the enclosed Engineering Report prepared by Waterman Moylan Consulting Engineers for further detail.

- ***“Provision of all necessary infrastructure to connect the development area to water supply infrastructure and all necessary connections shall be delivered in tandem with new development.”***

The requirements of this phasing item are noted and we acknowledge that all necessary infrastructure to connect the development area to water supply infrastructure and all necessary connections shall be delivered in tandem with new development.

We refer to the enclosed Engineering Report prepared by Waterman Moylan Consulting Engineers for further detail.

11 APPROPRIATE ASSESSMENT SCREENING

An Appropriate Assessment Screening Report, prepared by Enviroguide Consulting accompanies this application. This report concludes that the possibility of significant effects on any of the listed European Sites may be excluded and therefore, there is no requirement to proceed to Stage 2 of the AA Screening process and prepare a NIS.

12 ENVIRONMENTAL IMPACT ASSESSMENT

We confirm that an Environmental Impact Assessment Report has been prepared for the proposed development and is enclosed with the application.

The EIAR considers also cumulative development, including a concurrent LRD application for 302no. dwellings on the existing St. Mochta's sportsground site, and the consented Kellystown SHD scheme, including 374no. dwellings (ABP-312318-21, as amended by LRD0034-S3). In combination, the proposed development and these other residential schemes would exceed the mandatory threshold for EIAR.

13 CONCLUSION

It is our considered professional planning opinion that the development subject of this submission can be supported by the Planning Authority on the grounds that:

- The Kellystown lands are located within 'Dublin and Suburbs' and identified as having strategic residential development potential as part of the Dublin 15 / Blanchardstown area in the NPF. The lands are well connected, zoned and serviceable within the life of the current and next development plan.
- The proposed development is therefore in line with the aspirations of the Core Strategy for Fingal County and strategic policy objectives at National and Regional level to consolidate housing growth, to meet population projections, within the 'Dublin and Suburbs'.
- The development of the application site is sequentially appropriate, representing the logical next phase of development within the Kellystown Eastern Development Area, following the consented Kellystown SHD scheme (ABP-312318-21, as amended by LRD0034-S3), on zoned residential lands that are capable of being fully serviced, in accordance with the objectives for these lands set out in the Fingal County Development Plan and Kellystown LAP.
- The application site lies within 1000-1500m of high capacity commuter rail (both Coolmine and Clonsilla rail stations, to the east and west respectively). The proposed density at the application site and for the surrounding masterplan area is considered to be sustainable, and has due regard to its relative proximity to existing quality public transport.
- The proposed site access is consistent with the Kellystown LAP road hierarchy and requirements for site permeability and connectivity consistent with DMURS and the National Cycle Manual.
- The design and layout of the proposed development, including building height, has due regard to the site context and considerations both on site and at neighbouring lands. The proposed density, when considered both as a standalone application and the Eastern Development Area as a whole complies with the Compact Settlement Guidelines and the Kellystown Local Area Plan.
- The proposed design and layout seeks to maximise penetration of sunlight and daylight, and contribute positively to the design and appearance of the public realm. The proposed development will deliver a high quality residential and landscaped environment, that sets the standard for the development of future adjoining lands and 'Development Areas' within the Kellystown LAP area.

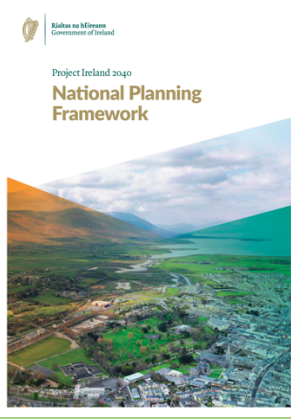
We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

14 ENCLOSURES

The following plans and particulars are enclosed with this application:

1. Cover Letter, prepared by Stephen Little & Associates.
2. Newspaper Notice.
3. Site Notice.
4. Applicant Consent to Agent Letter.
5. FCC Letter of Consent
6. Part V Proposals.
7. Proof of Payment Enclosed.
8. Planning Application Report (including Appendix A) prepared by Stephen Little & Associates.
9. Community and Social Infrastructure Audit prepared by Stephen Little & Associates.
10. Environmental Impact Assessment Report coordinated by Stephen Little & Associates.
11. EIA Portal Confirmation.
12. Architectural drawings prepared by O'Mahony Pike Architects (refer to enclosed schedule).
13. Architectural Design Statement prepared by O'Mahony Pike Architects.
14. Landscape Drawings, prepared by Doyle & O'Troithigh Landscape Architects.
15. Landscape Design Report prepared by Doyle & O'Troithigh Landscape Architects.
16. Engineering Drawings prepared by Waterman Moylan Consulting Engineers (refer to enclosed schedule).
17. Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers.
18. Flood Risk Assessment prepared by Waterman Moylan Consulting Engineers.
19. Travel Plan prepared by Waterman Moylan Consulting Engineers.
20. Energy Statement prepared by Waterman Moylan Consulting Engineers.
21. DMURS Statement of Consistency prepared by Waterman Moylan Consulting Engineers.
22. Appropriate Assessment Screening Report prepared by Enviroguide.
23. Construction Environmental Management Plan prepared by Enviroguide.
24. Daylight, Sunlight and Overshadowing Study prepared by Modelworks.
25. CGIs prepared by Modelworks.
26. Outdoor Lighting Report prepared by Sabre Electrical Services Ltd.
27. Public Lighting Layout Drawing prepared by Sabre Electrical Services Ltd.
28. Arboricultural Report prepared by The Tree File Consulting Arborists.
29. Tree Constraints Plan prepared by The Tree File Consulting Arborists.
30. Tree Impacts Plan prepared by The Tree File Consulting Arborists.
31. Tree Protection Plan prepared by The Tree File Consulting Arborists.

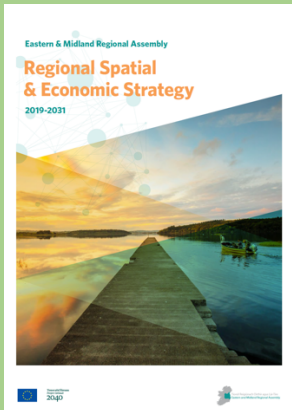
14 APPENDIX A – NATIONAL & REGIONAL STRATEGIC PLANNING POLICY AND SECTION 28 MINISTERIAL GUIDELINES - STATEMENT OF CONSISTENCY

<p>National Planning Framework – Ireland 2040 (First Revision)</p>		<p><i>The National Planning Framework (NPF) encourages consolidating growth within the M50 and canals to create a more compact urban form. The NPF marks a shift away from allowing urban sprawl, to a more urban public transport focussed development that will deliver a far denser compact urban form.</i></p> <p><i>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.</i></p>
<p>Chapter 2: A New Way Forward</p>		
<p>National Planning Objective 1 Ensure that all plans, projects and activities requiring consent arising from the National Planning framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</p>	<p>We confirm that an Environmental Impact Assessment Report has been prepared for this application and is enclosed.</p> <p>An Appropriate Assessment Screening Report, prepared by Enviroguide Consulting accompanies this application.</p> <p>Noting development permitted under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3, contains 374no. units, the subject application is for 302no. units and concurrent application for 99no. units, in combination, the mandatory threshold for EIAR has been exceeded.</p>	
<p>National Policy Objective 4 A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.</p>	<p>The proposed development is strategically located on lands close to the urban centre of Blanchardstown. The site is subject to a Local Area Plan prepared by the Local Authority that demonstrates the sites potential and suitability for development. This development provides increase population and employment within Dublin.</p>	
<p>National Policy Objective 7 Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.</p>	<p>The proposed development is wholly consistent with the aforementioned NPF objectives. The scheme provides for the sustainable development of a site to accommodate more compact, higher density development, that is accessible either by walking, cycling or use of public transport.</p>	
<p>National Policy Objective 8 Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.</p>	<p>Chapter 4: Making Stronger Urban Places</p>	
<p>National Policy Objective 12 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</p>	<p>The Kellystown Area has been masterplanned. The proposed development further expands the wider consented scheme, which will create an attractive urban neighbourhood that complies with sustainable urban design and development through the provision of high-quality streetscapes, urban spaces, active travel, landscape amenity etc.</p>	
<p>National Policy Objective 20 In meeting urban development requirements, there will be a presumption in favour of development that can</p>	<p>The site is proximate to the existing, well established major town centre of Blanchardstown.</p>	

<p>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.</p>	<p>The site is located proximate to rail transport, including Clonsilla and Coolmine rail stations, and subject of DART+ Railway Order application to ABP, including electrification of the rail service to these stations and enhanced pedestrian/cycle infrastructure at Porterstown Road.</p> <p>The proposed development (302no. dwellings) provides increase population and employment within Dublin.</p>
<p>National Policy Objective 22</p> <p>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.</p>	<p>The density and height of the proposed development at the application site is consistent with the relevant local and strategic policy objectives, and site proximity to existing quality public transport.</p> <p>A reduced standard of car parking is proposed in accordance with the Compact Settlement Guidelines.</p>
<p>Chapter 6: People, Homes and Communities</p>	
<p>National Policy Objective 37</p> <p>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.</p>	<p>The proposed development prioritises walking and cycling accessibility by integrating with the active travel network established by the permitted development (Planning Ref. ABP-312318-21) in proximity to the site. That scheme introduces key sections of the walking and cycling infrastructure for the Eastern Development Area, and the subject proposal will directly link into and extend this network. In doing so, the development supports connectivity, encourages sustainable transport, and aligns with the objectives of the Local Area Plan (LAP), including the promotion of physical activity facilities accessible to all age groups.</p>
<p>National Policy Objective 43</p> <p>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</p>	<p>The Kellystown Local Area Plan has been prepared which includes this site, confirming its potential for the development of a sustainable new residential neighbourhood, in accordance with the prescribed residential-led use mix and residential density.</p> <p>The proposed development of 302no. residential units is consistent with NPO 33 and associated regional and local planning policy to deliver a new residential community at Kellystown (Dublin 15).</p>
<p>National Policy Objective 44</p> <p>Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.</p>	<p>The proposed development provides the following dwelling mix:</p> <ul style="list-style-type: none"> • 35no. 4 bed houses • 62no. 3bed houses • 19no. 3bed duplex units • 7no. 2 bed duplex units • 81no. 2bed apartments • 98no. 1bed apartments <p>The LRD Planning Application seeks to comply with the principles of Universal Design. We refer to the enclosed Architectural Design Statement prepared by O’Mahony Pike Architects for further detail.</p> <p>The subject development, concurrent application at Luttrellstown Gate Phase 2 and permitted Luttrellstown Gate Phase 1 development (under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3) provide a total of 775no. dwellings, in a mix of house, duplex and apartment</p>

	<p>unit types. Together, the three developments offer a well-balanced mix of unit sizes, with a total of 198no. 1-bedroom units, 247no. 2-bedroom units, 270no. 3-bedroom units and 60-no. 4-bedroom units to be provided within the Eastern Development Area.</p>
<p>National Policy Objective 45 Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.</p>	<p>The proposed development delivers suitable density and building height that is consistent with NPO 45, the relevant Ministerial Guidelines, and local level planning policy objectives for these lands, providing a net residential density of approximately 40 units per hectare.</p> <p>The Kellystown LAP identifies density ranges for Development Areas as opposed to per application / plot. When the proposed development is considered in combination with concurrent application at Luttrellstown Gate Phase 2 (99no. dwellings) and permitted development at Luttrellstown Gate Phase 1 (under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3) a net density of 64no. units per hectare is achieved. This falls comfortably within the range of 50-75 dwellings per hectare required for the Eastern Development Area, and is thus consistent with the density objectives of the Kellystown LAP.</p> <p>We note the importance of providing a viable and sustainable overall mix within the Eastern Development Area and consider that this has been provided through the permitted and proposed applications.</p>
<p>Chapter 9: Realising Our Sustainable Future</p>	
<p>National Policy Objective 77 Enhance water quality and resource management by:</p> <ul style="list-style-type: none"> • Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities; • Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process; • Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, to create safe places. 	<p>The development is designed to minimise flood risk and integrates sustainable urban drainage systems in line with the Blue and Green Infrastructure Strategy of the Kellystown LAP 2021. A Site Specific Flood Risk Assessment has been prepared by Waterman Moylan Consulting Engineers and is enclosed.</p>
<p>National Policy Objective 83 Identify and strengthen the value of greenbelts and green and blue spaces at a regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.</p>	<p>The proposed development is a plan-led expansion of a new residential neighbourhood along the South West rail corridor (Dublin 15). It integrates a significant network of green infrastructure corridors through the site, in line with the Blue and Green Infrastructure Strategy of the Kellystown LAP 2021.</p>
<p>National Policy Objective 93 Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.</p>	<p>The development supports sustainable form of transport through high quality cycle facilities and public realm.</p> <p>A significant quantum of integrated green corridor links facilitate active travel and recreation.</p> <p>The site is in walking and convenient cycling distance to of Blanchardstown Town Centre. There are a number of public</p>

	bus services in proximity to the site as well as train stations within 1.5km.
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<p>Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019 – 2031</p>		<p><i>The Eastern and Midlands Regional Spatial and Economic Strategy (RSES) came into effect on 28 June 2019. The RSES includes the Dublin Metropolitan Area Strategic Plan (DMASP), which covers Dublin City and Metropolitan Area.</i></p> <p><i>This document sets out the regional level strategic planning policy for the eastern and midland region, and Dublin Metropolitan Area, in line with the national strategy and policy objectives for managing housing and employment development to support projected population growth set out in the NPF.</i></p>
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Chapter 4 – People & Place

<p>Regional Policy Objective 4.3</p> <p>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.</p>	<p>The proposed development representative of the plan-led development of a sustainable new neighbourhood at zoned land along the South West rail corridor / Dublin 15 strategic landbank. It provides for a sustainable density and use of finite development lands.</p> <p>The proposed net density proposed of c. 76 dw/ha is consistent with strategic planning policy and the Keyllstown LAP.</p>
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<p>Regional Policy Objective 4.8</p> <p>Support the regeneration of underused town centre and brownfield / infill lands along with the delivery of existing zoned and serviced lands to facilitate significant population growth and achieve sustainable compact growth targets of 30% of all new homes to be built within the existing built up urban area.</p>	<p>The proposed development , is representative of the compact, plan-led development of a sustainable new neighbourhood at zoned land, capable of being serviced, at the built up edge of Dublin & Suburbs, along the South West rail corridor / Dublin 15 strategic landbank.</p>
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Chapter 5 – Dublin Metropolitan Area Strategic Plan (MASP)

<p>Regional Policy Objective 5.3</p> <p>Future development in the Dublin Metropolitan area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.</p>	<p>The proposed development supports sustainable form of transport through high quality cycle facilities and public realm.</p> <p>A significant quantum of integrated green corridor links facilitate active travel and recreation.</p> <p>The site is in walking and convenient cycling distance to of Blanchardstown Town Centre offering numerous facilities and services. There are a number of public bus services in proximity to the site as well as train stations within 1.5km..</p>
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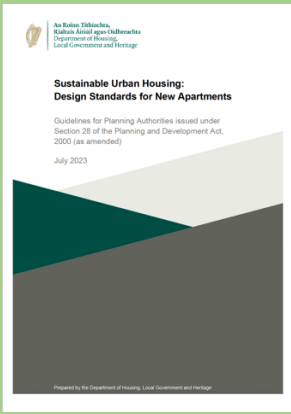
Chapter 7 – Environment and Climate

<p>Regional Policy Objective 7.15</p> <p>Local authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.</p>	<p>The proposed scheme is a plan-led expansion of a new residential neighbourhood along the South West rail corridor (Dublin 15). It integrates a significant network of green infrastructure corridors through the site, in line with the Blue and Green Infrastructure Strategy of the Kellystown LAP 2021.</p> <p>We refer also to the Biodiversity & Water EIAR Chapter, and AA Screening, prepared by Enviroguide Consulting, Tree Survey and Arboricultural Impact Assessment, prepared by</p>
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	The Tree File and Landscape proposals, prepared by Doyle O'Troithigh for details.
<p>Regional Policy Objective 7.41</p> <p>Support and promote structural materials in the construction industry that have low to zero embodied energy & CO₂ emissions.</p>	<p>We refer to the Climate Chapter of the enclosed Environmental Impact Assessment Report prepared by AWN Consulting.</p> <p>In addition, we refer to the enclosed Energy Statement prepared by Waterman Moylan Consulting Engineers.</p>
Chapter 8 – Connectivity	
<p>Regional Policy Objective 8.3</p> <p>That future development is planned and designed in a manner which maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned and to protect and maintain regional accessibility.</p>	<p>The proposed development supports sustainable form of transport through high quality cycle facilities and public realm.</p> <p>A significant quantum of integrated green corridor links facilitate active travel and recreation within proposed scheme and neighbouring permitted schemes.</p> <p>The site is in walkable distance to Blanchardstown Centre, offering numerous facilities and services.</p> <p>There are a number of public bus services in proximity to the site as well as train stations within 1.5km.</p>

<p>Climate Action Plan 2025</p>		<p><i>The Climate Action Plan 2025 sets out the roadmap to deliver on Ireland's climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022. This will enable Ireland to meet 2030 targets and be well placed to meet mid-century decarbonisation objectives. This will also deliver cleaner air, warmer homes, a more secure energy system and a better quality of life for Irish citizens.</i></p>
Built Environment		
Key Target		Applicant's Response
All new dwellings designed and constructed to Nearly Zero Energy Building standard by 2025, and Zero Emission Building standard by 2030.		The proposed development includes a range of sustainable design principles to ensure resilience to climate change. We refer the Planning Authority to Energy Statement, prepared by Waterman Moylan Consulting Engineers Climate Chapter of the enclosed Environmental Impact Assessment Report prepared by AWN Consulting.
Transport		
Theme	Key Target	Applicant's Response
Reduction in Total Vehicle Kilometres	20% reduction in total vehicle kms. relative to 2030 Business As Usual scenario.	<p>The proposed development:</p> <ul style="list-style-type: none"> Creates a permeable network of streets and spaces, with a clear hierarchy of street typologies that are designed in response to DMURS and the National Cycle Manual.
Reduction in Fuel Usage	50% reduction in fuel usage.	
	50% increase in daily active travel Journeys.	

Increase in Sustainable Transport Trips	130% increase in daily public transport journeys.	<ul style="list-style-type: none"> Delivers an internal road network that prioritises the creation of a safe environment for pedestrians and bicycles as well as a dedicated cycle and pedestrian pathway providing connectivity Facilitates looped vehicular access via a single looped access from the Kellystown, extending through the site and with potential to connect with the adjoining development lands. Supports sustainable movement through reduced car parking provision and high quality cycle parking and routes through the scheme and to the surrounding area.
	25% reduction in daily car journeys.	
Shift in Daily Journeys Modal Share	Shift in Daily Mode Share.	
	2018: 72% (Car), 8% (Public Transport), 20% (Active Travel). 2030: 53% (Car), 19% (Public Transport), 28% (Active Travel).	
Fleet Electrification	Private Car Fleet Battery EV share of total passenger car fleet (30%) EV share of new registrations (100%) 845,000 Private EVs	Electric Vehicle charging parking spaces are proposed in accordance with the current Fingal County Development Plan.

<h2 style="margin: 0;">Sustainable Urban Housing: Design Standards for New Apartments (2023)</h2>		<p><i>To meet housing demand in Ireland, it is necessary to significantly increase supply. This is a key pillar of the overarching Housing for All Plan. The National Planning Framework targets increased housing supply in Ireland's cities and urban areas in particular. For the reasons outlined earlier, increased housing supply must include a dramatic increase in the provision of apartment development.</i></p>
<h3>Housing Mix</h3>		
<p>Specific Planning Policy Requirement 1 – Unit Mix</p> <p>Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. 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).</p>	<p>The proposed development provides the following dwelling mix:</p> <ul style="list-style-type: none"> 35no. 4 bed houses 62no. 3bed houses 19no. 3bed duplex units 7no. 2 bed duplex units 81no. 2bed apartments 98no. 1bed apartments <p>As confirmed above, the proposed development is in accordance with SPPR1.</p> <p>The proposed scheme provides a sustainable mix of houses and apartments, catering for a wide variety of housing needs.</p> <p>The proposed apartment units are adaptable to meeting appropriate accessibility standards and are capable of internal floor plan modification to meet the changing household needs. The houses are designed to allow for future adaptability in response to the changing needs of residents over their lifetime.</p>	

	<p>Further details in this regard are provided in the accompanying Architectural Design Statement, Schedule of Accommodation and Housing Quality Assessment, prepared by O'Mahony Pike Architects.</p>
<p>Specific Planning Policy Requirement 2 – Unit Mix For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:</p> <ul style="list-style-type: none"> • For schemes of 50 or more units, SPPR 1 shall apply to the entire development; <p>All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.</p>	<p>N/A: SPPR 1 above applies to this development</p>
<p>Apartment Design Standards</p>	
<p>Specific Planning Policy Requirement 3 – Floor Areas Minimum Apartment Floor Areas:</p> <ul style="list-style-type: none"> • Studio apartment (1 person) 37 sq. m • 1-bedroom apartment (2 persons) 45 sq. m • 2-bedroom apartment (3 persons) 63 sq. m • 2-bedroom apartment (4 persons) 73 sq. m • 3-bedroom apartment (5 persons) 90 sq. m 	<p>The proposed units meet and comfortably exceed the minimum floor area requirements.</p> <p>We refer to the unit type drawings, floor plan drawings, Housing Quality Assessment, and Schedule of Accommodation, prepared by OMP Architects for further details.</p>
<p>Section 3.8 – Safeguarding Higher Standards It is a requirement that the majority of all apartments in any proposed scheme of 10 or more apartments exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).</p>	<p>All apartments in the proposed development meet or exceed the floor area requirements set out the Guidelines. The Housing Quality Assessment, prepared by O'Mahony Pike Architects, further confirms that the majority of the units are at least 10% greater than the minimum size required. (these units are outlined in green on the HQA).</p>
<p>Specific Planning Policy Requirement 4 – Dual Aspect In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p> <ol style="list-style-type: none"> 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 in. 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. 	<p>Of the 205no.proposed apartments, 126no. units (61.5%) are dual aspect.</p> <p>The Housing Quality Assessment, prepared by O'Mahony Pike Architects, confirms the proportion of dual aspect apartments.</p>
<p>Specific Planning Policy Requirement 5 – Floor to Ceiling Heights Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a</p>	<p>The proposed development complies with this requirement. We refer to the Elevations Drawings and Housing Quality Assessment, prepared by O'Mahony Pike Architects for confirmation.</p>

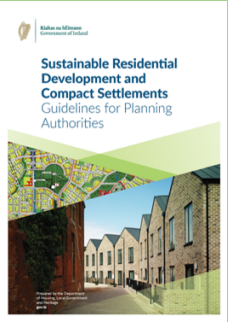
<p>future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</p>	
<p>Specific Planning Policy Requirement 6 – Lift Cores A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.</p>	<p>The apartments have been designed to ensure there is fewer than 12 units per core in all instances. We refer to the Floor Plans, prepared by O’Mahony Pike Architects for confirmation.</p>
<p>Section 3.30 – Internal Storage Minimum requirements for storage areas are set out in Appendix 1: -</p> <ul style="list-style-type: none"> • Studio apartment 3 sq. m • 1-bedroom apartment 3 sq. m • 2-bedroom apartment (3 persons) 5 sq. m • 2-bedroom apartment (4 persons) 6 sq. m • 3-bedroom apartment 9 sq. m <p>Other considerations: -</p> <ul style="list-style-type: none"> • No individual storage room within an apartment should exceed 3.5 sq. m. • Apartment schemes should provide storage for bulky items outside individual units (i.e. at ground or basement level). • Where secure, allocated ground or basement level storage is provided, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these guidelines. 	<p>The proposed development is consistent with these standards. We refer to the Floor Plans and Housing Quality Assessment, prepared by O’Mahony Pike Architects for confirmation.</p>
<p>Section 3.35 – Private Amenity Space It is a policy requirement that private amenity 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 level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Minimum required areas for private amenity space are set out in Appendix 1: -</p> <ul style="list-style-type: none"> • Studio apartment 3 sq. m • 1-bedroom apartment 3 sq. m • 2-bedroom apartment (3 persons) 5 sq. m • 2-bedroom apartment (4 persons) 6 sq. m • 3-bedroom apartment 9 sq. m <p>A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the minimum floor area requirement under these guidelines.</p>	<p>The proposed development is consistent with these private amenity space standards. We refer to the Housing Quality Assessment, prepared by O’Mahony Pike Architects for confirmation.</p>
<p>Section 3.40 – Security Considerations Where ground floor apartments are to be located adjoining the back of a public footpath or some other public area,</p>	<p>The proposed development is consistent with this. We refer to the Landscape Drawings, prepared by Doyle O’Triothigh for details.</p>

<p>consideration should be given to the provision of a 'privacy strip' of approximately 1.5m in depth.</p>	
<p>Communal Facilities</p>	
<p>Section 4.6 – Communal Facilities Communal rooms may be provided in apartment schemes, particularly in some larger developments. For example, communal laundry facilities and for drying clothes may be provided in well-ventilated areas. Other communal facilities may include community or meeting rooms or a management/maintenance office on-site. The provision of facilities within an apartment development could also extend to childcare or gym uses that may be open to non-residents.</p>	<p>The proposed developments spaces are all of high quality, and offer a wide diversity of aspect and function.</p>
<p>Section 4.8 – Refuse Provision shall be made for the storage and collection of waste materials in apartment schemes. Refuse facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and types and quantities of receptacles required.</p>	<p>The proposed development is consistent with the refuse storage requirements. We refer to the Floor Plans, prepared by O'Mahony Pike Architects and the Operational Waste Management Plan, prepared by Enviroguide for confirmation.</p>
<p>Section 4.10 – Communal Amenity Space Minimum required areas for public communal amenity space are set out in Appendix 1: -</p> <ul style="list-style-type: none"> • Studio apartment 3 sq. m • 1-bedroom apartment 3 sq. m • 2-bedroom apartment (3 persons) 5 sq. m • 2-bedroom apartment (4 persons) 6 sq. m • 3-bedroom apartment 9 sq. m 	<p>As confirmed by the Schedule of Accommodation, prepared by O'Mahony Pike Architects. The communal amenity space proposed is 1889sqm, which greatly exceeds the requirement of 1257sqm.</p>
<p>Section 4.13 – Children's Play Children's play needs around the apartment building should be catered for:</p> <ul style="list-style-type: none"> • Within the private open space associated with individual apartments (see chapter 3); • Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and • Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms. 	<p>Childrens play has been incorporated into the scheme.. We refer the Planning Authority to the enclosed Landscape Design Report, prepared by Doyle O'Troithigh Landscape Architecture.</p>
<p>Section 4.17 – Bicycle Parking & Storage The accessibility to, and secure storage of, bicycles is a key concern for apartment residents and apartment proposals must respond accordingly to the requirements below in their design and provision of cycle storage facilities. Requirements of these guidelines include:</p> <ul style="list-style-type: none"> • Location – cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road avoiding unnecessarily long access routes with poor passive security or, slopes that can become hazardous in winter weather. • Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio 	<p>A total of 977no. cycle parking spaces are proposed as part of the development, broken down as follows:</p> <ul style="list-style-type: none"> • Houses - Where a house has side or rear access to its private rear garden from the street, it is presumed that the residents of that house will store their bicycles in the private rear gardens. Where a house is terraced, and access to its private rear garden involves going through the internal ground floor of the house, secure bicycle parking is provided to the front of the dwelling, or within the streetscape in the vicinity of the dwelling. Each terraced 3 bedroom house is provided with 5 no. secure long-stay bicycle spaces, and each 4 bedroom house is provided with 6 no. secure long-stay bicycle spaces. Generally, each terraced house is provided with 1 no. horizontal

<p>units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.</p> <ul style="list-style-type: none"> • Design – cycle storage facilities shall be provide in a dedicated facility of permanent construction, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose built structure of permanent construction. Cycle parking areas shall also be designed so that cyclists feel personally safe - secure cage/compound facilities, with electronic access for cyclists and CCTV, afford an increased level of security for residents. Effective security for cycle storage is also maximised by the provision of individual cycle lockers and it is best practice that planning authorities ensure that either secure cycle cage/compound or preferably locker facilities are provided. • Management - an acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking, in particular, avoiding arrangements that lead to a significant number of lockers being left locked whilst empty for instance. Cycle parking shall be the subject of a funded maintenance regime that ensures that facilities are kept clean, free of graffiti, well-lit and the parking equipment will be properly maintained. It is essential, therefore, that as far as possible cycle parking is low maintenance, easy to use and easy and attractive to use by residents. 	<p>bicycle locker, which stores 2 bicycles, adjacent to its front door, and the balance of the long-stay bicycle parking is provided in on-street, gated bicycle stores.</p> <ul style="list-style-type: none"> • Apartments - In Blocks D, E & F, most long-stay bicycle parking is provided within dedicated bicycle stores located on the ground floor of those buildings. A combination of semi-vertical spaces and sheffield stand spaces is provided for each building. A bicycle repair station is provided within the internal bicycle stores in both Blocks F & D. Some longstay bicycle parking is also provided by external secure lockers, which are generally located in the narrow or shady parts of the communal open spaces. Please note that the area of the lockers is excluded from the communal open space quantum. 5% of all long-stay bicycle spaces are cargo-bicycle spaces, in line with the National Cycle Manual recommendations. <p>For the Block G1, G2, G3 & G4 duplexes, long-stay bicycle parking is provided in single storey bicycle store buildings that are located within their communal area.</p> <p>We refer the Planning Authority to the Architect’s Design Statement and Schedule of Accommodation, prepared by O’Mahony Pike Architects, for further details on bicycle parking.</p>
<p>Section 4.21 – 4.24 – Car Parking</p> <p>1) Central and/or Accessible Urban Locations</p> <ul style="list-style-type: none"> • In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity. • These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services. <p>2) Intermediate Urban Locations</p> <ul style="list-style-type: none"> • In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard. 	<p>The site is considered to be a Central and/or Accessible Urban Location due to the provision of frequency high capacity public transport subject to the provision of DART + West.</p> <p>The apartment guidelines noes that planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.</p> <p>The proposed development is within 1,100m of the Coolmine railway station, and as such the Zone 1 parking standards have been applied. The Zone 1 requirements of the Development Plan set out maximum parking allocations for residential developments</p> <p>Parking standards are considered to be a maximum rather than minimums.</p> <p>A total number of 241no. car parking spaces are proposed.</p> <p>We refer the Planning Authority to the Schedule of Accommodation and Architectural Design Statement, prepared by O’Mahony Pike Architects, and to the Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers, for further information on car parking rationale.</p>

<p>3) Peripheral and/or Less Accessible Urban Locations</p> <ul style="list-style-type: none"> As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required. For all types of location, where it is sought to eliminate or reduce car parking provision, it is necessary to ensure, where possible, the provision of an appropriate number of drop off, service, visitor parking spaces and parking for the mobility impaired. Provision is also to be made for alternative mobility solutions including facilities for car sharing club vehicles and cycle parking and secure storage. It is also a requirement to demonstrate specific measures that enable car parking provision to be reduced or avoided. 	
<p>Build-To-Rent and Shared Accommodation / Co-living Sectors</p>	
<p>Section 5.5 – Amenities</p> <ul style="list-style-type: none"> 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/hot desks, 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. 	<p>N/A</p>
<p>Specific Planning Policy Requirement 7 – Shared Accommodation / Co-living Development</p> <p>There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process.</p>	<p>N/A</p>
<p>Apartments and the Development Management Process</p>	
<p>Daylight / Sunlight</p> <ul style="list-style-type: none"> Planning authorities should ensure appropriate expert advice and input where necessary, and have regard to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings EN17037 or UK National Annex BS EN17037 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future guidance specific to the Irish context, when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision. 	<p>We refer the Planning Authority to the Daylight and Sunlight, prepared by Modelworks which provides the full technical analysis. In summary,</p> <p><i>“Daylight The scheme performed very well for daylight provision with 95% of the rooms achieving BRE compliance when assessed without trees and 92% when assessed with trees. The weakest performing block, block F, still achieved a compliance of 87% when assessed without trees and 82% when assessed with trees.</i></p> <p><i>Sunlight As with the results discussed above for daylight provision, the scheme also performs well for</i></p>

<ul style="list-style-type: none"> Where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment of specific. This may arise due to a design constraints associated with the site or location and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution. 	<p>sunlight exposure, with 84% of the units achieving BRE compliance when assessed without trees and 83% when assessed with trees.</p> <p><i>Amenity Areas</i> There are three communal open spaces (COS) adjacent to the assessed units, with a total area of circa 1,887sqm and 71% of the combined total area achieves compliance for sunlight on the ground. When assessed individually, two of the spaces are compliant and one, between blocks E and F, fails to reach the BRE threshold. In addition to the communal open spaces there are three environmental spaces and a large public open space, with a combined area of circa 11,855sqm and 97% of the area achieves compliance. In summary the scheme achieves a high compliance level with the BRE guidelines and future residents will also benefit from the large well-lit open spaces included in the proposal."</p>
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<h2 style="text-align: center;">Sustainable Residential Development and Compact Settlements Guidelines (2024)</h2>		<p><i>Sustainable Residential Development and Compact Settlements Guidelines (2024) set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.</i></p>
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Section 3 – Settlement, Place & Density

<p>Policy and Objective 3.1 – Density Ranges</p> <p>It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.</p> <p><small>Figure 3.3: Illustration of the process for establishing, optimising and refining appropriate density for a plan or development.</small></p> <pre> graph TD A[ESTABLISHING DENSITY RANGE] --> B[REFINING DENSITY] subgraph B [Refining Density] B1[STEP 1: ACCESSIBILITY] --> B2[STEP 2: LOCAL CHARACTER, AMENITY AND THE NATURAL ENVIRONMENT] end </pre>	<p>The site is located in the townlands of Kellystown, in the suburb of Clonsilla, Dublin 15. Kellystown is within the development boundary of Blanchardstown, a Metropolitan Town.</p> <p>The site is in walking and convenient cycling distance to of Blanchardstown Town Centre where currently comprises a large number of facilities of all types, including employment, leisure, retail and commercial within the preferred maximum walking distance of 4km. A good provision of interconnected footpaths is provided along the entire route from the subject site towards the Blanchardstown Centre.</p> <p>The site is served by both existing bus and rail provision, with bus services from Wilton Terrace to Blanchardstown Centre running frequently within 500m of the site. The Coolmine and Clonsilla train station are located within 1.5km from the site as the crow flies.</p> <p>The Bus Connects project currently being promoted by the National Transport Authority aims to deliver a much-enhanced bus service to the Greater Dublin Area (GDA). The routes proposed to serve the subject development area travel to and from Burlington Road as well as Dublin City Centre. Each of these stops are located within walking distance of the subject site.</p>
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	<p>Under these guidelines, the site can best be described as a 'City – Suburban / Urban Extension'. Within these areas, the guidelines note,</p> <p><i>“Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at ‘accessible’ suburban / urban extension locations (as defined in Table 3.8).”</i></p> <p>Table 3.8 notes that an ‘Accessible Location’ is defined as <i>“Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.”</i></p> <p>As the nearest bus stop is approximately c. 450m (5 minute walk) which is served by routes 37 & 70n. The former has a frequency of 5-10 minutes and therefore, the site is considered to be an ‘Accessible Location’, where densities of up to 150dph net are open for consideration.</p> <p>The proposed development seeks to provide 302no. residential units in a mix of houses, duplexes and apartments ranging from 1 – 7 storeys in height on a site area of c. 4.39a, resulting in a net density of 76no. units per Ha and therefore is in accordance with Sustainable Residential Development and Compact Settlements Guidelines (2024).</p> <p>The Kellystown LAP identifies density ranges for Development Areas as opposed to per application / plot. When the proposed development is considered in combination with concurrent application at Luttrellstown Gate Phase 2 (99no. dwellings) and permitted development at Luttrellstown Gate Phase 1 (under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3) a net density of 64no. units per hectare is achieved. This falls comfortably within the range of 50-75 dwellings per hectare required for the Eastern Development Area, and is thus consistent with the density objectives of the Kellystown LAP.</p> <p>We note the importance of providing a viable and sustainable overall mix within the Eastern Development Area and consider that this has been provided through the permitted and proposed applications.</p>
<p align="center">Section 5 – Development Standards for Housing</p>	
<p>Specific Planning Policy Requirement 1 – Separation Distances</p> <p>It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level.</p> <p>When considering a planning application for residential development, a separation distance of at least 16 metres</p>	<p>In the first instance, we refer the Planning Authority to the enclosed Site Layout Drawings prepared by O’Mahony Pike Architects.</p> <p>The project utilises the design guidance set out in the Sustainable & Compact Settlement Guidelines, such as rear separation distances of c. 16m, reduced car parking ratios, and narrower streets. It is considered that a high standards of amenity will be enjoyed by the residents of this development.</p>

<p>between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained.</p> <p>Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p> <p>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</p> <p>In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.</p>	
<p>Specific Planning Policy Requirement 2 – Minimum Private Open Space Standards for Houses</p> <p>It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:</p> <p>1 bed house 20 sq.m 2 bed house 30 sq.m 3 bed house 40 sq.m 4 bed + house 50 sq.m</p> <p>A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all.</p> <p>Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).</p>	<p>As confirmed in the Housing Quality Assessment and plans prepared by O’Mahony Pike Architects, all housing units comply with the minimum private open space standards within the guidelines.</p> <p>We can confirm that the proposed duplex units meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023.</p>
<p>Specific Planning Policy Requirement 3 – Car Parking</p> <p>It is a specific planning policy requirement of these Guidelines that:</p> <ul style="list-style-type: none"> In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling <p>Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum</p>	<p>In the first instance, we refer the Planning Authority to the enclosed Traffic and Transport which provides a justification for the proposed car parking rational.</p> <p>A total number of 241 no. Car parking spaces are proposed.</p> <p>We refer the Planning Authority to the Schedule of Accommodation and Architectural Design Statement, prepared by O’Mahony Pike Architects, and to the Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers, for further information on car parking rationale.</p> <p>As the nearest bus stop is approximately c. 450m (5 minute walk) which is served by routes 37 & 70n. The former has a frequency of 5-10 minutes and therefore, the site is</p>

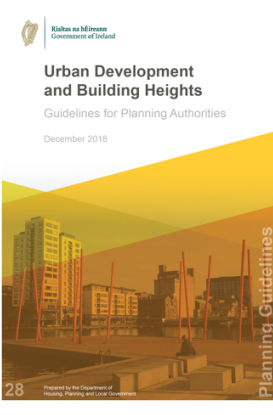
<p>provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.</p>	<p>considered to be an ‘Accessible Location’. As per SPPR 3, car parking at such locations should be substantially reduced. The maximum rate of car parking provision for residential development shall be 1.5 no. spaces per dwelling. The proposed development proposes at total of 241no. spaces, equating to 0.8 spaces per dwellings, well below the maximum quantum.</p> <p>The development supports sustainable forms of transport through high quality cycle facilities and public realm. The site is in walking distance to Blanchardstown Centre, offering numerous facilities and services. There are a number of public bus services in proximity to the site as well as train station within 1.1km.</p>
<p>Specific Planning Policy Requirement 4 – Cycle Parking and Storage</p> <p>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.</p> <p>The following requirements for cycle parking and storage are recommended:</p> <ul style="list-style-type: none"> Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers. Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided. 	<p>A total of 977no. cycle parking spaces are proposed as part of the development, broken down as follows:</p> <ul style="list-style-type: none"> Houses - Where a house has side or rear access to its private rear garden from the street, it is presumed that the residents of that house will store their bicycles in the private rear gardens. Where a house is terraced, and access to its private rear garden involves going through the internal ground floor of the house, secure bicycle parking is provided to the front of the dwelling, or within the streetscape in the vicinity of the dwelling. Each terraced 3 bedroom house is provided with 5 no. secure long-stay bicycle spaces, and each 4 bedroom house is provided with 6 no. secure long-stay bicycle spaces. Generally, each terraced house is provided with 1 no. horizontal bicycle locker, which stores 2 bicycles, adjacent to its front door, and the balance of the long-stay bicycle parking is provided in on-street, gated bicycle stores. Apartments - In Blocks D, E & F, most long-stay bicycle parking is provided within dedicated bicycle stores located on the ground floor of those buildings. A combination of semi-vertical spaces and sheffield stand spaces is provided for each building. A bicycle repair station is provided within the internal bicycle stores in both Blocks F & D. Some longstay bicycle parking is also provided by external secure lockers, which are generally located in the narrow or shady parts of the communal open spaces. Please note that the area of the lockers is excluded from the communal open space quantum. 5% of all long-stay bicycle spaces are cargo-bicycle spaces, in line with the National Cycle Manual recommendations. <p>For the Block G1, G2, G3 & G4 duplexes, long-stay bicycle parking is provided in single storey bicycle store buildings that are located within their communal area.</p> <p>We refer the Planning Authority to the Architect’s Design Statement and Schedule of Accommodation, prepared by O’Mahony Pike Architects, for further details on bicycle parking.</p>
<p>Policy and Objective 4.1 – DMURS</p> <p>It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an</p>	<p>The proposal creates a permeable network of streets and spaces, with a clear hierarchy of street typologies that are designed in response to DMURS and the National Cycle Manual.</p> <p>We refer to the enclosed Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers.</p>

<p>integrated approach to quality urban design and placemaking.</p>	
<p>Policy and Objective 5.1 – Public Open Space</p> <p>It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.</p> <p>In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.</p> <p>In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.</p>	<p>In terms of public open space requirements, we note that Objective CIO5038 states,</p> <p><i>“Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.”</i></p> <p>The proposed development of 302no. dwellings comprises:</p> <ul style="list-style-type: none"> • 35no. 4 bed houses (35 x 3.5 persons = 122.5) • 62no. 3bed houses (62 x 3.5 persons = 217) • 19no. 3bed duplex units (19 x 3.5 persons = 66.5) • 7no. 2 bed duplex units (7 x 1.5 persons = 10.5) • 81no. 2bed apartments (81 x 1.5 persons = 121.5) • 98no. 1bed apartments (98 x 1.5 persons = 147) <p>The expected occupancy above results in a population equivalent of 685 people. This would give a pro-rata public open space area requirement of min. 17,125sqm sqm,</p> <p>The quantum of Public Open Space proposed amounts to:</p> <ul style="list-style-type: none"> • Class 2 POS = 0.8231 (8,231 m²) • Class 1 POS = 0.4075ha (4,075m²) <p>In terms of Class 1 public open space, the public park permitted as part of the Kellystown SHD scheme (ABP-312318-21, as amended by LRD0034-S3) amounts to c. 27,869sqm. This is in excess of the requirements for the consented SHD dwellings, by c. 7,494sqm. As c. 3,419sqm of this has been allocated to the concurrent Luttrellstown Gate Phase 2 scheme (99no. dwellings), the remaining c. 4,075sqm is allocated to the subject scheme in terms of Class 1 open space provision.</p> <p>8,231sqm of Class 2 Open Space is provided within the gross site area, resulting in a public open space shortfall of c.4,819sqm.</p> <p>A total of c. 6,455sqm (16.3%) of class 2 public open space is provided within the net site area.</p> <p>We would therefore highlight, that in addition to the Class 1 and Class 2 public open space areas identified above, there is also a significant quantity of ‘Environmental Open Space’ proposed within the scheme, which will be of benefit to the new residential neighbourhood. We consider that these spaces further enhance the visual and natural amenity in this area.</p> <p><i>The Kellystown LAP is clear in that Class 1 POS is provided to the south of the Kellytown Link Road. The Applicant has facilitated delivery of the schools, burial grounds, new sportsground for St. Mochtas and c. 2.8 Ha of Class 1 public parkland (under Luttrellstown Gate Phase 1) on the full extent of lands under their ownership to the south of the Kellystown Link Road. There is a considerable swathe of additional Public Open Space to be delivered further west including an 8 Ha public park, urban farm, off-leash dog park and additional green and blue corridors. The Applicant is in continuing and active negotiations with the adjoining third</i></p>

	<p>party landowner with a view to acquiring both the Central Development Area lands to the north of the Kellystown Link Road and a substantial swathe of Open Space zoned lands to the south of the Kellystown Link Road and we would respectfully submit that additional public open space lands will be forthcoming as will the ultimate realisation of the full development vision for the Kellystown LAP lands.</p>
<p>Section 5.3.6 – Operation and Management of the Development</p> <p>For developments that include multi-unit and compact housing blocks, communal facilities such as refuse storage areas should be provided in open spaces that will not be taken in charge.</p> <p>Planning applications should include an operational management plan that sets out details of the long-term management and maintenance of the scheme. The plan should address provisions made for the storage and collection of waste materials in residential schemes, particularly where there are reduced areas of private outdoor space. Communal refuse facilities shall be accessible to each housing unit and designed with regard to the projected level of waste generation and types and quantities of receptacles required.</p>	<p>A Resource Waste Management Plan and Operational Waste Management Plan prepared by Enviroguide Consulting are enclosed.</p>
<p>Section 5.3.7 – Daylight</p> <p>The provision of acceptable levels of daylight in new residential developments is an important planning consideration, in the interests of ensuring a high quality living environment for future residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties.</p> <p>In cases where a technical assessment of daylight performance is considered by the planning authority to be necessary regard should be had to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.</p>	<p>We refer the Planning Authority to the Daylight and Sunlight, prepared by Modelworks which provides the full technical analysis. In summary,</p> <p><i>“Daylight The scheme performed very well for daylight provision with 95% of the rooms achieving BRE compliance when assessed without trees and 92% when assessed with trees. The weakest performing block, block F, still achieved a compliance of 87% when assessed without trees and 82% when assessed with trees.</i></p> <p><i>Sunlight As with the results discussed above for daylight provision, the scheme also performs well for sunlight exposure, with 84% of the units achieving BRE compliance when assessed without trees and 83% when assessed with trees.</i></p> <p><i>Amenity Areas There are three communal open spaces (COS) adjacent to the assessed units, with a total area of circa 1,887sqm and 71% of the combined total area achieves compliance for sunlight on the ground. When assessed individually, two of the spaces are compliant and one, between blocks E and F, fails to reach the BRE threshold. In addition to the communal open spaces there are three environmental spaces and a large public open space, with a combined area of circa 11,855sqm and 97% of the area achieves compliance. In summary the scheme achieves a high compliance level with the BRE guidelines and future residents will also benefit from the large well-lit open spaces included in the proposal.”</i></p>
<p>Appendix D: Design Checklist - Key Indicators of Quality Urban Design and Placemaking</p>	
<p>1. Sustainable and Efficient Movement</p> <ul style="list-style-type: none"> Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)? 	<p>We refer the Planning Authority to the enclosed Engineering Assessment Report and Travel Plan prepared by Waterman Moylan Consulting Engineers.</p> <p>These documents address how the proposed developmet considers traffic and transportation issues, including, traffic</p>

<ul style="list-style-type: none"> • Have opportunities to improve connections with and between established communities been identified and responded to with particular regard to strategic connections between homes, shops, employment opportunities, public transport, local services and amenities? • Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users? • Has the quantum of parking been minimised (in accordance with SPPR4 where relevant) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles? 	<p>generation, pedestrian and cyclist linkages and safety, public transport availability and capacity.</p>
<p>2. Mix of Land Uses (Vibrant Centres and Communities)</p> <ul style="list-style-type: none"> • Is the mix and intensity of land uses appropriate to the site and its location and have land uses been distributed in a complementary manner that optimises access to public transport, amenities and local services via walking or cycling? • Have a diverse and varied range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by an innovative range of housing typologies that support greater housing affordability and choice? • Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable) and promote town centre living (where applicable)? • Is the regeneration and revitalisation of an existing centre or neighbourhood supported by the enhancement of the public realm so as to create a more liveable environment, attract investment and encourage a greater number of visitors (where applicable)? 	<p>The Kellystown LAP makes provision of a mixed use centre, commercial and community uses within the 'Central Development Area' of Kellystown. This would indicate that the Planning Authority is satisfied that sufficient local retail services will be provided for, and that in the interim nearby Clonsilla village and major town centre facilities at Blanchardstown to the north will adequately serve the emergent new residential community at Kellystown Eastern Development Area. We note that a retail unit has been permitted in adjacent Block A.</p> <p>We refer the Planning Authority, to the accompanying Pre-Planning Report, prepared by Stephen Little & Associates and the Architectural Design Statement, prepared by O'Mahony Pike Architects.</p> <p>The proposed development is consistent with the land use, and development standards, objectives and policies, identified in the Fingal County Development Plan 2023-2029 and Kellystown Local Area Plan 2021, and in other relevant Ministerial Guidelines.</p>
<p>3. Green and Blue Infrastructure (Open Space, Landscape and Heritage)</p> <ul style="list-style-type: none"> • Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the setting of protected structures, conservation areas and historic landscapes? • Have a complementary and interconnected range of open spaces, corridors and planted/landscaped areas been provided, that create and conserve ecological links and promotes active travel and healthier lifestyles? • Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)? 	<p>The permitted scheme includes a public park with active and passive recreation facilities (c. 2.1 Ha), smaller public pocket parks, green infrastructure links and communal private open space.</p> <p>The proposed development further enhances this through the provision of c. 8,231sq (18.8%) of Public Open Space is provided in the gross site area, with c. 6,455sqm (14.8%) provided in the net site area. The public open space strategy for the proposed scheme aligns with the principles of the Kellystown LAP, with a large public open space being provided along the eastern side of the residential site. We note that this area of public open space has increased in size and width since the S247 consultation</p> <p>Although other green open spaces are provided on the northern and western sides of the residential site, these spaces have been categorised as Environmental Areas for the purposes of this preplanning consultation</p>

<ul style="list-style-type: none"> Does the plan or development proposal include integrated nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation? 	<p>The Green Infrastructure Masterplan for the proposed development has been developed and agreed with Fingal County Council, in accordance with the relevant provisions of the Fingal County Development Plan and the Kellystown LAP. The Green Infrastructure Masterplan seeks to develop a network of green spaces, ecosystems and habitats which are connected via retained or developed landscapes.</p> <p>We refer the Planning Authority to the Landscape Design Report prepared by Doyle O'Troithigh Landscape Architects.</p>
<p>4. Responsive Built Form</p> <ul style="list-style-type: none"> Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure in terms of block layouts and building heights with particular regard to the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight? Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface? Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant), integrate well within its context and provide appropriate transitions with adjacent buildings and established communities so as to safeguard their amenities to a reasonable extent? Has a coherent architectural and urban design strategy been presented that will ensure the development is sustainable, distinctive, complements the urban structure and promotes a strong sense of identity? 	<p>We refer the Planning Authority to the accompanying Architectural Design Statement, prepared by O'Mahony Pike Architects for further detail on the proposed built form.</p>

<p>Urban Development & Building Heights Guidelines for Planning Authorities (2018)</p>		<p><i>Urban Development & Building Heights Guidelines for Planning Authorities (2018) outline wider and strategic policy considerations and a more performance criteria driven approach that planning authorities should apply alongside their statutory development plans in securing the strategic outcomes of the National Planning Framework.</i></p>
<p>SPPR 1</p> <p>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</p>	<p>The scheme proposes a variety of heights in response to site conditions and considered at the scale of the settlement, neighbourhoods and the buildings.</p> <p>The buildings along the eastern edge of the residential site vary in height from 3 - 7 storeys, with the 7 storey elements located in the northeast corner of the site, where a</p>	

<p>National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.</p>	<p>Gateway building is indicated in the Kellystown LAP, and in the southeast corner, adjoining permitted Block A.</p> <p>The buildings heights along the eastern side of the scheme provide a strong urban edge to the Eastern Development Area of the Kellystown LAP. The buildings that overlook the northern edge of the residential site vary in scale from 3 - 7 storeys, providing a strong urban edge overlooking the railway and the Royal Canal. The duplex buildings that create an urban block around the traveller accommodation are 3 storey.</p> <p>The proposed development seeks to provide 302no. residential units in a mix of houses, duplexes and apartments ranging from 1 – 7 storeys in height on a site area of c. 4.39ha , resulting in a net density of 76no. units per Ha.</p> <p>The Kellystown LAP identifies density ranges for Development Areas as opposed to per application / plot. When the proposed development is considered in combination with concurrent application at Luttrellstown Gate Phase 2 (99no. dwellings) and permitted development at Luttrellstown Gate Phase 1 (under Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3) a net density of 64no. units per hectare is achieved. This falls comfortably within the range of 50-75 dwellings per hectare required for the Eastern Development Area, and is thus consistent with the density objectives of the Kellystown LAP. We note the importance of providing a viable and sustainable overall mix within the Eastern Development Area and consider that this has been provided through the permitted and proposed applications.</p> <p>The proposed building heights and density are in accordance with the Kellystown Local Area Plan.</p>
<p>SPPR 2</p> <p>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.</p>	<p>The proposed development seeks permission for the construction of 302no. residential units comprising of apartment, duplex and apartment units providing 1-bed, 2-bed, 3-bed and 4-bed units at lands currently in use as a football club in the townland of Porterstown, Clonsilla, Dublin 15.</p> <p>The subject lands are zoned 'Residential' as identified within the Kellystown Local Area Plan.</p>
<p>SPPR 3</p> <p>It is a specific planning policy requirement that where;</p> <p>(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and</p> <p>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;</p> <p>then the planning authority may approve such development, even where specific objectives of the</p>	<p>We refer to the above addressing how the proposed development complies with the SPPRs of the Urban Development & Building Heights Guidelines for Planning Authorities (2018).</p> <p>The proposed development is located within a Local Plan Area as opposed to a Planning Scheme.</p>

<p>relevant development plan or local area plan may indicate otherwise.</p> <p>(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme</p> <p>(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.</p>	
<p>SPPR 4</p> <p>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:</p> <ol style="list-style-type: none"> 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. 	<p>The proposed development is situated in the townland of Porterstown, Clonsilla, Dublin 15 within the Kellystown Local Plan area.</p> <p>As demonstrated above, the proposed development is compliant with the minimum densities set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.</p> <p>The proposed development seeks to provide 302no. residential units in a mix of houses, duplexes and apartments ranging from 1 – 7 storeys in height on a site area of c. 4.39ha , resulting in a net density of 76no. units per Ha.</p> <p>The proposed building heights and density are in accordance with the Kellystown Local Area Plan.</p>
<p>Section 3.2 Development Management Criteria</p> <p>At the Scale of the Relevant City / Town</p> <ul style="list-style-type: none"> • The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. • Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.³ Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect. • On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape. 	<p>Applicant’s Response</p> <p>The site is best described as an outer suburban site, located within 1km – 1.5km of high capacity commuter rail stations at Clonsilla and Coolmine, which are also planned to be electrified as part of DART + West project.</p> <p>The development will ensure to have a positive impact on the streetscape, providing a sense of space and place through careful architectural design.</p> <p>The arrangement of the buildings and the building heights themselves have been arranged to respond to the surrounding context and scale of surrounding developments and makes a positive contribution to the urban neighbourhood and streetscape as a result. The variety of massing, height and elevational treatment helps provide a variety of built form and interest in this area and does so working with the existing topography.</p> <p>We refer the Planning Authority to the accompanying Architectural Design Statement and elevational drawings prepared by O’ Mahony Pike Architects for further architectural details.</p>

<p>At the Scale of District / Neighbourhood / Street</p> <ul style="list-style-type: none"> • The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape. • The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered. • The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009). • The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner. • The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood. 	<p>Applicant’s Response</p> <p>The proposal has been developed using best practice urban design principles including permeability, legibility, and connectivity. The proposal consists of clear and legible routes and spaces, which are accessible by all. Valuable routes are provided for cycle and pedestrian movements throughout the site connecting the open spaces within the scheme to the surrounding area.</p> <p>The buildings design, height and separation distances are centred around pedestrian streets, creating a sense of enclosure, with active ground floor uses and overlooking residential units.</p> <p>The open spaces proposed provides a high level of amenity for future residents which is passively overlooked by the apartments and complies with the standards set out in the Development Plan and other Guidelines.</p> <p>The development will include a mix of building and dwelling typologies, with various units for different stages of the life cycle.</p>
<p>At the Scale of the Site / Building</p> <ul style="list-style-type: none"> • The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. • Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’. • Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution. 	<p>Applicant’s Response</p> <p>The design and layout of the proposed development, including building height, has due regard to the site context and considerations both on site and at neighbouring lands.</p> <p>The scheme proposes a variety of heights in response to site conditions and considered at the scale of the settlement, neighbourhoods and the buildings.</p> <p>The buildings along the eastern edge of the residential site vary in height from 3 - 7 storeys, with the 7 storey elements located in the northeast corner of the site, where a Gateway building is indicated in the Kellystown LAP, and in the southeast corner, adjoining permitted Block A.</p> <p>The buildings heights along the eastern side of the scheme provide a strong urban edge to the Eastern Development Area of the Kellystown LAP. The buildings that overlook the northern edge of the residential site vary in scale from 3 - 7 storeys, providing a strong urban edge overlooking the railway and the Royal Canal. The duplex buildings that create an urban block around the traveller accommodation are 3 storey.</p>
<p>Specific Assessments</p> <p>To support proposals at some or all of these scales, specific assessments may be required and these may include:</p> <ul style="list-style-type: none"> • Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. • In development locations in proximity to sensitive bird and / or bat areas, proposed developments need 	<p>Applicant’s Response</p> <p>We confirm that an Environmental Impact Assessment Report has been prepared for the proposed development.</p> <p>The EIAR considers concurrent Luttrellstown Gate Phase 2 application of 99no. dwellings as well as the consented Kellystown SHD scheme, including 374no. dwellings (ABP-312318-21, as amended by LRD0034-S3). In combination, the proposed development and these other residential schemes would exceed the mandatory threshold for EIAR.</p>

<p>to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.</p> <ul style="list-style-type: none"> • An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links. • An assessment that the proposal maintains safe air navigation. • An urban design statement including, as appropriate, impact on the historic built environment. • Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate. 	<p>The EIAR is being co-ordinated by Stephen Little & Associates, Chartered Town Planners and Development Consultants with specialist input from the following: -</p> <ul style="list-style-type: none"> • EnviroConsulting, responsible for the following EIAR Chapters: - <ul style="list-style-type: none"> ○ Land, Soil & Geology. ○ Biodiversity. ○ Water. ○ Climate (Air Quality). ○ Material Assets (Waste). ○ Population & Human Health. ○ Air (Noise & Vibration). • AWN Consulting are responsible for: <ul style="list-style-type: none"> ○ Climate (Climate Change). • Doyle O Troithigh Landscape Architecture, responsible for the following EIAR Chapter: - <ul style="list-style-type: none"> ○ Landscape and Visual Impact Assessment. • Courtney Deery responsible for the following EIAR Chapter: - <ul style="list-style-type: none"> ○ Cultural Heritage (Architectural and Archaeological). • Modelworks, responsible for the following EIAR Chapter: - <ul style="list-style-type: none"> ○ Climate (Daylight / Sunlight). • Waterman Moylan Consulting Engineers, responsible for the following EIAR Chapters: - <ul style="list-style-type: none"> ○ Material Assets (Transportation). ○ Material Assets (Utilities). • Stephen Little & Associates Chartered Town Planners & Development Consultants, responsible for the following EIAR Chapters: - <ul style="list-style-type: none"> ○ Description of Proposed Development. ○ Examination of Alternatives. ○ Examination of Alternatives. ○ Summary of Mitigation and Residual Effects. ○ Summary of Cumulative Impacts and Interactions. <p>Specific Assessments</p> <ul style="list-style-type: none"> • Appropriate Assessment Screening Report, Enviroguide • Arboricultural Assessment & Tree Survey, The Tree File Consulting Arborists • Daylight / Sunlight Assessment, Modelworks • Public Lighting Assessment, Sabre • Sustainability / Climate Action & Energy Statement prepared by Waterman Moylan Consulting Engineers
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<p style="text-align: center;">National Sustainable Mobility Policy</p>		<p><i>The National Sustainable Mobility Policy sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.</i></p>
<p>Support People Focused Mobility by: -</p> <ul style="list-style-type: none"> Continuing to make existing and new walking, cycling and public transport networks more accessible for all users. Implementing a universal design approach in the design of walking, cycling and public transport infrastructure and in the retrofitting of older infrastructure. 	<p>The proposed development at the Kellystown lands will contribute to the implementation of these guiding principles.</p> <p>This ensures that a range of sustainable transport options will become available and accessible to the existing and prospective local residential community.</p>	
<p>Support Better Integrated Mobility by: -</p> <ul style="list-style-type: none"> Adopting a transport-orientated housing development approach. Identifying housing delivery areas within a 1 km distance of public transport stops with the best potential to grow. 	<p>The proposed development will be served by and support investment in the DART+ West programme to electrify the Dublin-Maynooth rail line, bringing DART services to Coolmine and Clonsilla rail stations, within 20 minute walking distance of the proposed development. It also compliments the plans to replace the level crossing at Porterstown with pedestrian and cycle overbridge facilities, connecting Clonsilla village to the school facilities in Porterstown, via the proposed Porterstown Road green way through the Kellystown lands.</p>	
<p>Principles and Goals</p> <ul style="list-style-type: none"> Better Integrated Mobility <p>9. Better integrate land use and transport planning at all levels.</p>	<p>We refer the Planning Authority to the enclosed Travel Plan prepared by Waterman Moylan Consulting Engineers for further detail.</p>	