



**ARMSTRONG
FENTON**
ASSOCIATES

PROJECT:

**Proposed Large-scale Residential Development (LRD) in the
townland of Boherboy, Saggart, Dublin 24.**

APPLICANTS: **Kelland Homes Ltd & Evara Developments Ltd.**

REPORT: **Planning Statement**

DATE: **December 2025.**

**Planning &
Development
Consultants**



<u>Table of Contents</u>		<u>Page</u>
Executive Summary		3
1.0 Introduction		9
2.0 Pre-planning Consultation		13
3.0 Planning History		24
4.0 Planning Context		29
5.0 Social & Affordable Housing – Part V Proposal		45
6.0 Site Location and Description		46
7.0 Proposed Development		49
8.0 Water Services Infrastructure		130
9.0 Flood Risk		135
10.0 Other Services Infrastructure		142
11.0 Phasing		142
12.0 Casement Aerodrome, Baldonnell		144
13.0 Statement of Effects of Environment and European Sites		146
14.0 Conclusion		148
Appendix 1 – Details re Department of Education correspondence		151
Appendix 2 – Letters of Consent		153



EXECUTIVE SUMMARY

Introduction

- This Planning Statement has been prepared on behalf of Kelland Homes Ltd and Evara Developments Ltd (the Applicants) to accompany drawings and details put forward as part of an application for permission for a Large-scale Residential Development (hereafter “LRD”) for a proposed residential development on lands at Boherboy, Saggart, Co. Dublin.
- The purpose of this Planning Statement is to provide background information on the site and a description of the proposed development, compliance with various development management standards, policies and objectives, and addresses many of the issues/items raised in the relevant LRD Opinion (Ref. LRDOP003/25).
- This Planning Statement should be read in conjunction with the accompanying Statement of Consistency as well as the submitted Architectural and Urban Design Statement, Landscape Design Rationale and all of the submitted drawings, technical reports and documents listed within the separate, enclosed Cover Letter by Armstrong Fenton Associates.
- We refer the reader to the body of the report for detail; however, we set out the key relevant considerations below.

Site Opportunities and Constraints

- The subject site has very particular characteristics and a number of physical constraints that have influenced the design solution. The overall site area is c.18.7Ha, however, taking into account the site’s topography, the need to retain hedgerows and provide appropriate buffers, creation of riparian buffers, maintaining open watercourses, providing for natural surface water treatment solutions and catering for road/footpath improvements, as well as taking into the requirement to reserve a school site within the application site and take into account existing wayleave conditions, the net developable area of the site is reduced by c.6.45ha to 12.2Ha, i.e. c.35% of the total site area is undevelopable, thus leaving c.65% of the gross site as capable of accommodating housing, on this site that is zoned for new residential development. The key constraints on the subject site are:
 - It is a steeply sloping site with considerable topographical challenges for laying out an accessible residential scheme – there is a c.37m difference in site levels from north to south boundaries, and an undevelopable area in the south-west corner due to site levels.
 - There are 2 existing water supply pipe wayleaves running through the site, as identified in yellow on the submitted plans.
 - In accordance with the Development Plan, a minimum 10m riparian buffer is required from the top of the bank of the Corbally Stream that runs along the eastern boundary of the site, upon which no development and/or public open space provision / calculation is permitted.
 - The existing western hedge and tree line also requires retention and protection, with a 10m buffer to same provided for along the entire length of the site.
 - The existing central hedge line requires retention and protection.
 - A flood risk zone to the north of the site.



- C.1 hectare of the site requires to be reserved for the future provision of a primary school.
- The incorporation of nature-based SuDS solutions, married with the proposed landscape design has informed the proposed housing layout plan.
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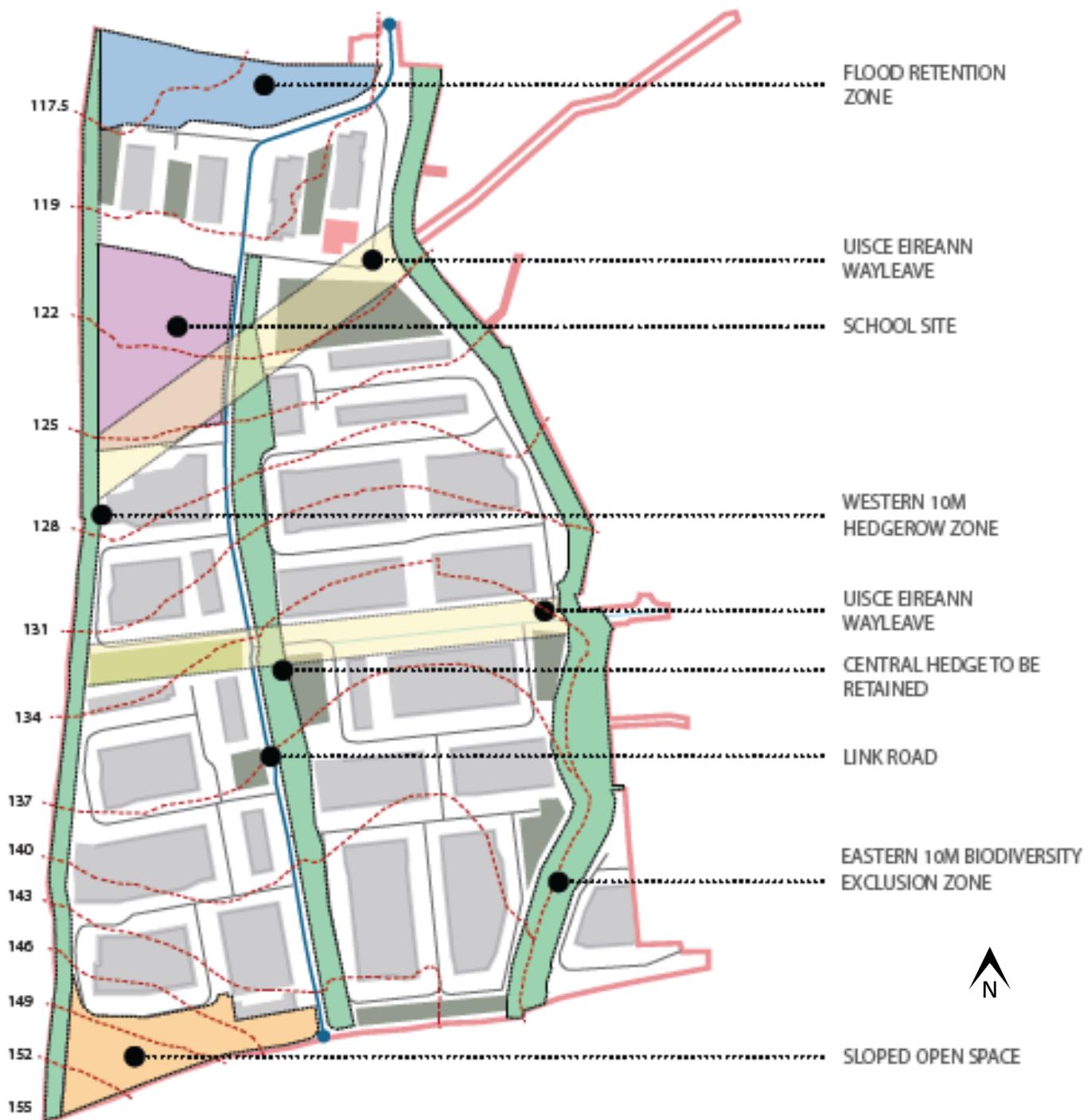


Fig. 1 – Site Constraints



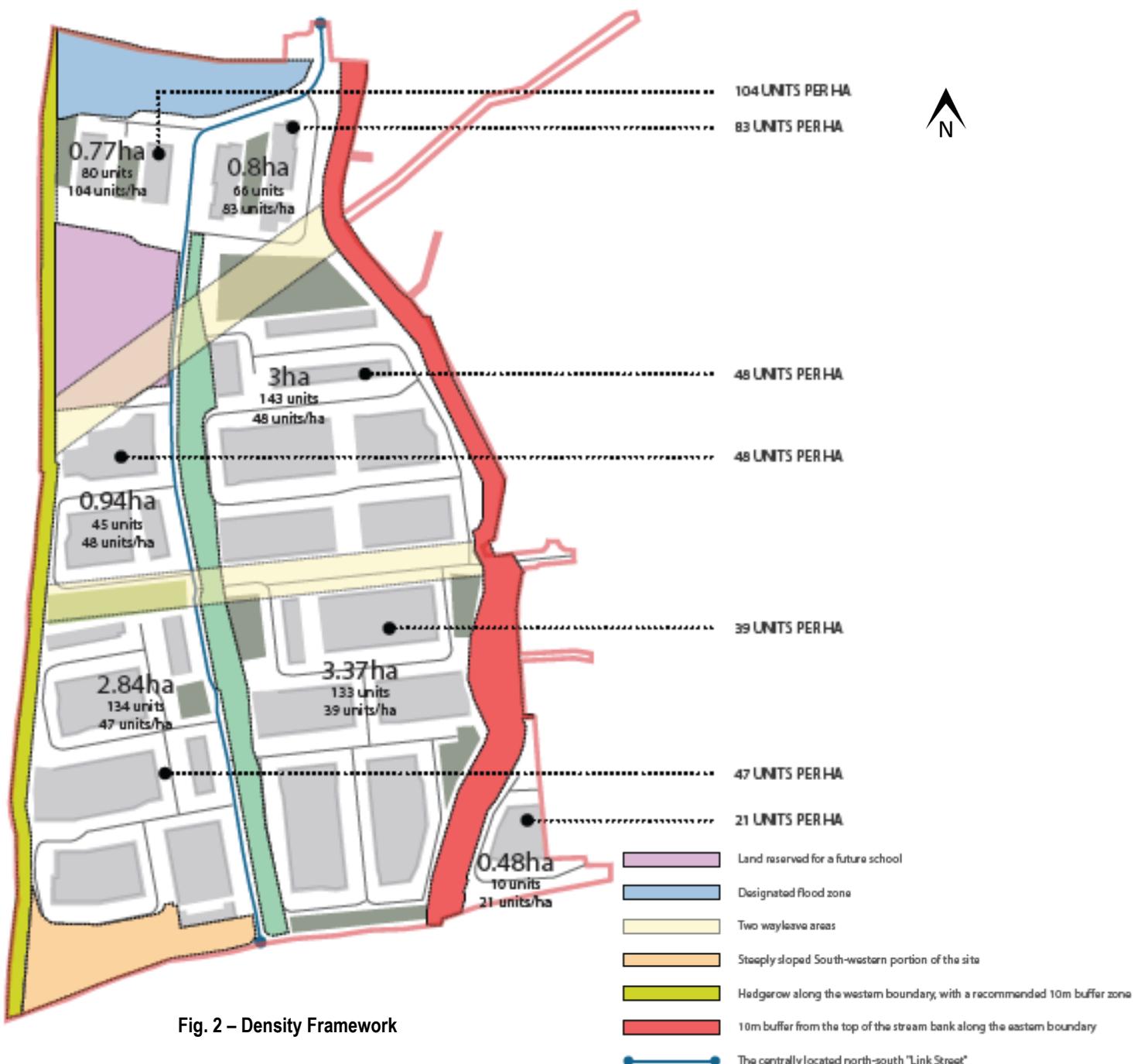
Layout Principles and Considerations

- The subject site has a number of physical constraints that were not only considered as part of previous design proposals but remain fixed and therefore, to a certain extent continue to influence a final design solution.
- It is a steeply sloping site, with site levels ranging from 155mOD in the south-west corner to 117.5mOD in the north-west corner, a difference of c.37 metres across its length. The topography therefore creates considerable topographical challenges for laying out an accessible and visually pleasing residential scheme.
- A number of significant services wayleaves also traverse the site. The site's natural features including hedgerows, streams and biodiversity, are all primary considerations. The site has been subject to a comprehensive programme of ecological surveys, carried out by Scott Cawley, project ecologists and the details of the type and dates of the surveys are included, as set out in the enclosed Environmental Impact Assessment (EIAR) to which we refer the reader for full details (i.e. Chapter 5 – Biodiversity).
- The site layout and urban design approach is based on:
 - Retention of hedgerows and trees as much as possible.
 - Respecting the riparian strip along the watercourse to the east of the site, and creation of protective buffer along the western boundary hedgerow and watercourse. No development will occur inside / on these buffers.
 - Ensuring legibility of pedestrian and cyclist routes and connectivity to public transport, services and facilities. It is important to note that under previous planning applications for this site that, any proposed development was reliant on the Boherboy Road for access as there were no means to provide an access via Corbally or Carrigmore. The subject application will now be able to provide these access points, as well as the proposed access from the Boherboy Road. This is fundamentally different to what was proposed under previous applications i.e. SHD Ref.s ABP-304828-19 and ABP-313145-22 where third-party consents were required. The proposed access from Boherboy Road, with connections into Corbally to the east and Carrigmore to the north have been agreed in principle with the Planning Authority via pre-planning consultation for this proposed LRD.
 - Working with the topography of the site, which dictates that taller built elements should be focused to the northern part of the site.
 - Ensuring a network of connected and useable public open spaces, play areas and communal open spaces.
 - Ensuring that SUDs principles and solutions have both informed the proposed site layout plan and married with the landscaping proposals for the site. We refer to the drainage and engineering proposals by Roger Mullarkey & Associates, Consulting Engineers, the proposed landscaping details by Gannon & Associates, Landscape Architects and the Site Specific Flood Risk Assessment (SSFRA) prepared by Kilgallen and Partners Consulting Engineers.

Density

- The net density is calculated in accordance with the guidance set out in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024, (hereafter “Compact Settlements Guidelines”). The delivery of 611 units, on a net site area of c.12.2 hectares, provides a net density of c.50 units per hectare across the entire site.

- In accordance with the aforementioned guidelines, the proposed development is located within the Metropolitan Area of Dublin City, albeit it on the edge of the urban built up area and, as per Table 3.1 of same, the site is considered to be categorised as a “City – Suburban/Urban Extension” site, given its greenfield nature at the edge of the existing built-up area of South Dublin. In accordance with Table 3.1, densities in the range of 40 dph to 80 dph shall generally be applied at suburban and urban extension locations in Dublin. We note that under the LRD Opinion received by the Planning Authority for this site (Ref. LRDOP00325) the Planning Authority “agrees that the appropriate density range for this site is between 40 to 80 uph”.
- The proposed density is also put forward with consideration to the guidance of the NPF, the Building Height Guidelines, the Apartment Guidelines, and the Housing for All programme, all as affirmed in the enclosed Statement of Consistency.





- Based upon the requirements of the Compact Settlements Guidelines and the planning history attached to the subject site, the subject site has a net developable area of c.12.2 Ha, upon which it is proposed to develop 611 no. dwellings, thus equating to a net density of c.50 units per hectare across the entire site. In accordance with the Compact Settlement Guidelines which provides guidance on how to calculate the net residential density, and as illustrated in Fig. 2 above, the following areas within the site have been discounted to calculate the resultant net density:
 - Land reserved for a future school (c.1.03 Ha),
 - Designated flood zone (c.0.69Ha),
 - Two no. drainage wayleaves traversing the site (c.1.33Ha),
 - South-western portion above the 120m contour line (c.0.49 Ha)
 - Hedgerow along the western boundary and its 10m buffer zone (c. 0.66Ha),
 - 10m buffer from the top of the stream bank along the eastern boundary (c. 1.24Ha)
 - Area occupied by central ditch (c.0.8Ha)
 - The centrally located north-south "Link Street" (c. 0.4Ha).

Based upon the discounting of these “undevlopable” areas on the overall site, a net resultant density of c.50 dwellings per hectare is achieved across the entire site. This aligns with the Sustainable Development and Compact Settlement Guidelines, which recommend a range of 40–80 dwellings per hectare on the subject site, as concurred by the Planning Authority in the subject LRD Opinion.

Green & Blue Infrastructure Integration with Landscaping

- The proposed development seeks to integrate overland / nature-based surface water treatment solutions with landscaping. This approach has informed the architectural site layout plan. The proposed development integrates the natural heritage features on the site i.e. streams and newly created wet areas creating natural “bubbles” with swales and attenuation zones that manage rainwater while preserving the site’s natural character. Areas like rain gardens and tree pits contribute to the ecological balance, and natural play zones offer interactive spaces for children.
- The landscape proposal incorporates natural SUDS strategies to manage stormwater across the site, using techniques like permeable surfaces and green spaces to integrate water management seamlessly into the environment. This approach not only addresses ecological concerns but also encourages community interaction by ensuring that these systems are part of the public realm. The surface water drainage infrastructure for the development will collect and treat the rainfall on the site and convey the runoff via roadside swales, tree pits, bio-retention areas, rain garden planters, open course conveyance swales, pipes, manholes, catchpit manholes and direct the flows via 9 no. open detention basins and 1 no. below ground attenuation system towards vortex flow restricting devices (Hydrobrake or similar) and petrol interceptors before outfalling to the existing on site open watercourses.
- Streets are designed as flexible, accessible spaces that promote community use, allowing residents to engage with their surroundings in a meaningful way. The design fosters both environmental sustainability and social interaction by blending functional water management with vibrant public spaces.
- The design introduces a “Bubbles SUDS” strategy, where circular forms inspire the spatial arrangement and visual identity of the development. This bubble motif is reflected in the layout of communal spaces, rain gardens, and bioretention areas, creating soft, organic shapes that mimic the natural dynamics of water. This circular design integrates SUDS solutions seamlessly into the landscape, fostering a playful yet functional community environment.

- The “Playful Streets” strategy introduces visual “bubbles” through coloured paving and geometric shapes along the streets, fostering dynamic, inviting spaces for social interaction and play. These combined approaches promote both sustainability and community, blending functionality with natural aesthetics.





1.0 Introduction

1.1 Introduction and Purpose of this Planning Statement

This Planning Statement has been prepared by Armstrong Fenton Associates, Planning & Development Consultants of 13 The Seapoint Building, 44/45 Clontarf Road, Clontarf, Dublin 3, D03 A0H3, on behalf of Kelland Homes Ltd and Evara Developments Ltd (the Applicants) to accompany this application for permission for a Large-scale Residential Development planning application, submitted to the Planning Authority, South Dublin County Council, in respect of a site measuring c.18.7 hectares, located in the townland of Boherboy, Saggart, Co. Dublin.

The applicants are seeking planning permission to develop the subject site as a LRD consisting of 611 no. residential units, comprised of 306 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached & terraced houses, 133 no. 1, 2 & 3 bed duplex units in 12 no. 2-3 storey blocks, and 172 no. 1, 2 & 3 bed apartments in 5 no. buildings ranging in height from 4-5 & 5 storeys. The proposed development also includes a 2-storey crèche (c.630m²).

The proposed development falls under the definition of Large-scale Residential Development (LRD) as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act, 2021, as it consists of “*the development 100 or more houses*” the floor space of which “*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 purpose of this Planning Statement is to provide background information on the site and a description of the proposed development. This Planning Statement should be read in conjunction with the accompanying Statement of Consistency as well as the submitted Architectural and Urban Design Statement, Landscape Design Rationale and all of the submitted drawings, technical reports and documents listed within the enclosed Cover Letter by Armstrong Fenton Associates.

The application is also supported by a comprehensive range of additional, separate planning documents to which we refer the reader including for, *inter alia*:

- Statement of Response to South Dublin County Council’s LRD Opinion ((Ref. LRDOP00325),
- Statement of Consistency with relevant national, regional and local planning policy,
- Social & Community Infrastructure Assessment,
- Housing Quality Assessment,
- Building Life Cycle Report,
- Environmental Impact Assessment Report (EIAR).

It should be noted that a dedicated website has been set up for this planning application which can be viewed at www.boherboylrd.ie.

1.2. The proposed LRD can be described as follows, as per the public notices:

Kelland Homes Ltd. and Evara Developments Ltd. wish to apply for permission for a Large-scale Residential Development (LRD) on a site located at Boherboy, Saggart, County Dublin. To the immediate north of the site is the Carrigmore residential estate, to the west are agricultural lands and a single dwelling, to the east is the Corbally residential estate and Carrigmore Park, while to the south is the Boherboy Road.

The proposed development consists of 611 no. dwellings, comprised of 306 no. 2, 3, 4 & 4-5 bed, 2 & 3 storey, detached, semi-detached & terraced houses, 133 no. 1, 2 & 3 bed duplex units in 12 no. 2-3 storey blocks, and 172 no. 1, 2 & 3 bed apartments in 5 no. buildings ranging in height from 4-5 & 5 storeys. The proposed development also includes a 2-storey crèche (c.630m²).



Access to the development will be via one no. new vehicular access point from the Boherboy Road, along with new vehicular connections to adjoining developments at Corbally Heath to the east and Carrigmore Green to the north. Ten no. houses in the south-east part of the site will be accessed from Corbally Glade to the east. The proposed development includes for pedestrian and cyclist connections throughout the proposed development and accesses into adjoining lands at Carrigmore Park, Corbally Heath and Corbally Glade to the east and Carrigmore Green to the north.

Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c. 2.3Ha of public open space, and c. 4,750sq.m of communal open space associated with proposed development.

The proposed development provides for (i) all associated site development works above and below ground, including surface water attenuation & an underground foul sewerage pumping station at the northern end of the site, (ii) public open spaces (c. 2.3Ha), (iii) communal open spaces (c. 4,750sq.m), (iv) hard & soft landscaping and boundary treatments, (v) surface car parking (861 no. car parking spaces), (vi) bicycle parking (711 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) diversion of all existing overhead ESB lines underground, (ix) public lighting, and (x), plant / PV panels (M&E), utility services & 8 no. ESB sub-stations, all on an overall application site area of c.18.7Hha. In accordance with the South Dublin County Development Plan (2022-2028), an area of c.1.03Ha within the site is reserved as a future school site.

1.3. The Applicants

This LRD application for permission consists of 611 no. dwellings and a creche, being proposed by two separate landowners, relating to two adjoining sites to be developed by (a) Evara Developments Ltd. on the western side and (b) Kelland Homes Ltd. on the eastern side. Please refer to Fig. 4 over which illustrates that the western side of the application site is owned by Evara Developments Ltd., while the eastern side is owned by Kelland Homes Ltd. The south-eastern part of the application site is jointly owned by the two applicants and abuts Corbally to the east, with access to this parcel (c.0.2Ha) to be via Corbally Glade.

The proposed application represents the development of the entire “Boherboy Neighbourhood” as was identified within the previous Fortunestown Local Area Plan (2012), however, it is noted that this LAP expired in 2022. Given the majority of the lands identified for new residential development in the LAP have been developed to date, it is unlikely a new LAP will be prepared. It should be noted that the two landowners of the “Boherboy Neighbourhood” lands have come together as joint applicants for the proposed development and as a result, a coordinated and comprehensive development proposal is now put forward for planning permission, as it is considered this joint approach is the most appropriate approach for the co-ordinated development of the site and represents the proper planning and sustainable development of the Boherboy Neighbourhood.

In its totality, the proposal put forward provides for a sustainable, integrated development. It should also be noted that the prospective applicants are long established house builders, having delivered thousands of homes in South Dublin County and beyond, for circa many years. Upon a grant of permission, it is their intention to carry out the proposed development and deliver much needed housing. Given the separate ownership of the two plots of land, it is likely that the development will be carried out by the applicants on their own landholdings in an independent manner and therefore we request that cognisance be paid to this fact when considering the overall development proposal and the accompanying drawings and details. Notwithstanding the separate ownerships and likely separate delivery teams for the development post grant of planning permission, ongoing liaison and co-ordination between the two landowners is intended in order to ensure a symbiotic relationship during the delivery stage, in a timely and phases manner.



Set out further in this report (section 4) is the planning history associated with the subject site, however, the applicants have taken on board the previous decisions to refuse permission on this site and it is considered that the overall proposal, particularly the proposed site layout plan, urban design and housing typologies have been revised in a manner that addresses previous concerns, whilst also taking into consideration the context of the site itself. In addition, in 2024, the applicants engaged with the Planning Authority in the two stages of the LRD pre-planning process and received an LRD Opinion from South Dublin County Council on 11th September 2024 under Ref. LRDOP00224. Based upon the feedback received in same, the applicants were unable to complete the final LRD planning application required to be submitted within six months and set about restarting the necessary LRD pre-planning stages have taken on board all of the feedback received to date from the Planning Authority.

1.4 Consent to Submit subject Planning Application

In submitting this application for permission, letters of consent from the following have been provided to the Applicants, in allowing lands outside of their ownership / control to be included within the subject red line of application:

1. Mary Kelly is the registered owner of the lands on the eastern side of the proposed development, being put forward for permission by Kelland Homes Ltd.
2. Violet Express Limited is the owner of the lands in the south-eastern part of the subject application site (where 10 no. houses are proposed).
3. Aderrig 4 Residential Limited is the registered owner of the lands on the eastern side of the proposed development, being put forward for permission by Evara Developments Limited. [NOTE: Evara Developments Limited is under the same “umbrella” as Aderrig 4 Residential Limited].
4. South Dublin County Council to the Applicants consenting to the inclusion of their lands as part of the subject application.

Copies of the above letters of consent are enclosed and are also in Appendix 2 of this Planning Statement.



Fig. 4 – Site Location and Land Ownership



2.0 Pre-planning Consultation

As outlined above, the applicant engaged with the Planning Authority as part of the LRD pre-planning process, initiating it in 2023 and receiving an LRD opinion in September 2024 under Ref. LRDOP00224.

As the six-month deadline under which to submit a LRD planning application on foot of receipt of the LRD opinion expired without submitting the final LRD planning application, the applicants initiated a second, separate LRD pre-planning process, and following on from this, the subject LRD application is now being submitted for permission.

2.1 LRD “Stage 1” Section 247 Pre-Application Consultation

The context and design approach to the application site and for the proposed development, have been subject to pre-planning consultation with the South Dublin County Council (hereafter ‘SDCC’) Planning Department under Section 247 of the Planning and Development Act, 2000 (as amended). The S.247 pre-planning meeting was held with SDCC via Microsoft Teams on 28th February 2025. The pre-planning Ref. No. for the meeting was LRDPP001/25.

The main representatives of the Planning Authority at the meeting were Gormla O’Corrain, Senior Planner, and Aisling Kelly, Senior Executive Planner. Also, in attendance at the meeting on behalf of SDCC were representatives from the various departments of SDCC, including Parks/Public Realm, Roads / Transportation and Water Services.

In attendance on the side of the design team, were Tracy Armstrong of Armstrong Fenton Associates, Scott Morton of Davey + Smith Architects, Ben McDonald of MCORM Architects Ronan Kearns of Pinnacle Consulting Engineers, Roger Mularkey of Roger Mularkey & Associates and Jonathan Gannon of Gannon + Associates Landscape Architecture.

The overarching principles of the proposed LRD were discussed at this meeting with the main issues raised including for, *inter alia*: the constraints and topography of the site, proposed vehicular access arrangements, the SUDS strategy, focusing on above-ground attenuation features and integrating them into the landscape design, protection of natural heritage features on site, the proposed density, the design and useability of open spaces, the standard and quality of residential development proposed, and proposed building heights.

It should be noted that following the above meeting, the applicant’s design team members have further liaised with the Planning Department and other departments of SDCC, as appropriate, to address areas of concern which were raised at the meeting prior to the submission of the subject request for an LRD “Stage 2” pre-application consultation.

2.2 “Stage 2” LRD Pre-Planning Meeting

The formal “LRD” meeting with the Planning Authority was held on 20th May 2025 online, via Microsoft Teams, under Section 32C of the Planning and Development (Large Scale Residential Developments) Act 2021, under Ref. LRDOP003/25.

The main representatives of the Planning Authority at the meeting were Gormla O’Corrain, Senior Planner, and Aisling Kelly, Senior Executive Planner. Also, in attendance at the meeting on behalf of SDCC were representatives from the various departments of SDCC, including Parks/Public Realm, Roads / Transportation and Water Services.

In attendance on the side of the design team, were Tracy Armstrong of Armstrong Fenton Associates, Scott Morton of Davey + Smith Architects, Ben McDonald of MCORM Architects Ronan Kearns of Pinnacle Consulting Engineers, Roger Mularkey of Roger Mularkey & Associates and Jonathan Gannon of Gannon + Associates Landscape Architecture.



The main topics discussed at the “LRD” meeting included, *inter alia*:

1. Development proposal,
2. Ecological and riparian setbacks incorporated into the development proposal,
3. The landscape strategy has been shaped by hydrogeological findings, enhancing sustainability and functionality,
4. The incorporation of SuDS into the design, alongside multifunctional open space,
5. The need to include in the final application details on the RES-N zoning objectives, in view of a decision by An Bord Pleanála relating to the Oldcourt LRD application (LRD24A/0007) for context,
6. The proposed scale and density were considered appropriate, as was the unit mix and dual aspect ratios,
7. The overall layout was considered acceptable with the revised continuity between the two sites considered a positive development, enhancing integration,
8. The reduction in large, rendered elevations was noted and welcomed. Any remaining prominent elevations should incorporate brickwork instead of render to enhance durability and ensure long-term visual quality,
9. Watercourses to be clearly overlaid on relevant drawings,
10. Details on the proposed diversion of overhead pylons to be included in the final application details, along with a detailed phasing plan, outlining the sequence of development and infrastructure delivery,
11. The Public Realm section acknowledged the updated proposal reflects significant improvements in layout, accessibility, and integration with the surrounding landscape,
12. All ecological survey outputs and ecological reports are expected to be submitted as part of the final application documentation. Concerns were raised regarding the proposed translocation of marsh habitat with the final application details to be supported by clear ecological justification and design evidence demonstrating long-term habitat sustainability. The Heritage Officer noted that the revised ecological and landscape designs were welcomed and showed a more integrated approach.

2.3. South Dublin County Council LRD Opinion, Ref. LRDOP003/25

Under Section 32(D) of the aforementioned Act, the Planning Authority’s LRD Opinion was received on 17th June 2025 under Case Reference LRDOP003/25. The LRD Opinion states: *“Taking into account the discussion held at the s32C LRD Meeting, and the particulars received for the purpose of that meeting, it is the conclusion of the Planning Authority that the submitted particulars alone and in their present form **do constitute a reasonable basis** for making an LRD planning application, subject to further consideration and amendment based on the recommendations and assessment contained in this report.*

In the event that the applicant proceeds to submit a planning application, the LRD application should include:

- A statement of response to the issues in the LRD Opinion
- A statement that in the applicant’s opinion, the proposal is consistent with the relevant objectives of the development plan”.

The LRD Opinion sets out the following issues to be addressed as part of a LRD planning application. Enclosed with this application is a separate document prepared by Armstrong Fenton Associates entitled ‘Statement of Response to South Dublin County Council’s LRD Opinion’ (hereafter “LRD Response Document”). This document fully addresses all of the matters raised in the LRD Opinion, so for full details please refer to same. However, for convenience only Table 1 overleaf provides a summary of same:



Item No.	Item Requested	Method of Response
1	<p>Procedural - A number of the larger architectural drawings (such as full site plans and contiguous elevations) are very slow to load and difficult to navigate due to their large file sizes. To support efficient review, the applicant is requested to provide a second, low-resolution version of all large-format plans as part of the final application. In addition, the applicant is strongly encouraged to submit one hard copy of all documents to the Planning Authority to further facilitate assessment.</p>	<p>We have submitted, via the planning portal, all drawings and documentation, with each drawing / document not exceeding 20mb. We have also submitted a number of lower resolution versions of various drawings / documents. One hard copy of all of the enclosures included in this LRD planning application is submitted separately to South Dublin County Council. In addition, all documents can be viewed on the website set up by the Applicant: www.boherboylrd.ie.</p>
2	<p>Urban Design and General Layout – For the final application, the following additional documentation and clarifications are required to support a comprehensive assessment of the proposed development:</p> <ul style="list-style-type: none">▪ Additional standalone contiguous elevations must be provided across key parts of the site. This is particularly important for visually prominent areas such as along Boherboy Road, the entire length of the Spine Road (both sides), and the northern boundary adjacent to the open space.▪ The Accessibility Audit within the Design Statement should be expanded to include the full Boherboy Road interface. The relevant elevation should also be rechecked for accuracy to ensure alignment with the submitted floor plans and building elevations.▪ A proposed site layout plan shall be included, clearly labelling all proposed contours and structural features such as retaining walls, gabion walls, and other site infrastructure. Elevations for each of these structural elements should also be submitted to allow for proper visual and technical assessment.▪ The applicant must provide longitudinal cross-sections extending across the	<p>As outlined in the submitted LRD Response Document, MCORM & Davey+Smith Architects, as well as Gannon & Associates have prepared a series of contiguous elevations / sections which are all enclosed with this application for permission.</p> <p>The enclosed site layout plan by MCORM Architects (drawing no. HBY-MRM-AR-ZZ-DR-P4-XX-XX-0012 Overall Site Layout Plan) at a scale of 1:1000, illustrates all proposed contours and structural features. In addition, two no. part site plans at a scale of 1:500 are also submitted, refer to the enclosed MCORM drawing no.s (drawing no.s 0013 & 0014 Site Layout Plan Part 1 of 2 and Part 2 of 2).</p> <p>Details of the proposed density and the areas of the site that have been discounted for density purposes / to calculate the net developed area are outlined in sections 2.3 and 3.1 of the enclosed Architectural and Urban Design Statement and section 7.6 of the submitted Planning Statement – please refer to same. We confirm that the gross site area is c.18.7Ha with c.6.45Ha of the site discounted as undevelopable areas within the site, thus the net development area is c.12.2Ha. The proposed development of 611 no. dwellings produces a net density of 50 units per hectare across the entire site which is in accordance with the appropriate density range of 40 – 80 units per hectare for a site like this.</p>



	<p><i>entire site, with particular focus on areas where significant cut and fill is proposed. These sections are essential to allow the Planning Authority to fully assess the topographical and visual impacts of the development.</i></p> <ul style="list-style-type: none"><i>The Planning Authority supports a residential density range of 40 to 80 units per hectare (uph) for this site. The final application must include a clearly defined and consistently applied net site area, which should be verified and cross-referenced across all submitted documentation.</i>	
3	<p>Housing and Residential Amenity –</p> <p><i>The applicant shall submit a detailed Housing Quality Assessment (HQA) demonstrating full compliance with the County Development Plan and relevant Guidelines in relating to the design and amenity of each of the units on site. In particular those standards in relation to dual aspect, minimum storage sizes, minimum private open space etc. No single aspect north facing units should be provided - the use of such is unacceptable to the Planning Authority. The orientation of any single aspect apartment should be detailed. In addition, the applicant shall submit a complete Daylight & Sunlight Analysis Report confirming that all habitable rooms meet the necessary requirements in terms of Daylight & Sunlight and that the proposal will not cause any significant material impacts on existing development within the area.</i></p>	<p>Please refer to the enclosed Housing Quality Assessment (HQA) which provides details of the area of the units, room widths, storage, aspect etc. There are no north facing, single aspect units in the proposed development.</p> <p>Please also refer to the submitted Daylight and Sunlight Assessment prepared by Digital Dimensions which confirms that all habitable rooms meet the minimum standard for daylight provision as per BS EN 17037:2018+A1:2021 as referred to in the BRE guidelines BR209:2022 (third edition).</p> <p>The enclosed assessment also states that the assessment of daylight is in accordance with IS EN 17037:2018, shown for supplementary information, the vast majority of habitable rooms achieve daylight provision as set out in IS EN 17037:2018. The assessment also states that all habitable rooms within the proposed development achieve the minimum target daylight levels set out in BS EN 17037:2018+A1:2021, as referred to in the BRE guidelines BR209:2022 (third edition) and no compensatory measures are required. We refer the reader to the enclosed Daylight/Sunlight Assessment for full details.</p>



4	<p>Public Housing / Part V –</p> <p><i>The applicant to confirm the dates they purchased the sites and shall continue to liaise with the SDCC Housing Team with regards to the final Part V offer.</i></p>	<p>The Applicants are proposing the provision of 20% of the total number of dwellings i.e. 123 no. units proposed as Social and Affordable housing.</p> <p>Please refer to the enclosed MCORM drawing no. BHBY-MRM-AR-ZZ-DR-P4-XX-XX-0015 "Site Plan – Part V" which identifies the location of the units that are proposed to satisfy the Part V obligation associated with the proposed development. The proposed 123 no. units consist of the following breakdown:</p> <p>Kelland Homes Ltd proposes 71 no. units, comprised of 5 no. houses, 40 no. duplex units and 26 no. apartments. Out of this, 42 no. units are proposed as Social Housing Units and 29 no. are proposed as Affordable Housing Units.</p> <p>Evara Developments Ltd proposes 52 no. units, comprised of 4 no. houses and 48 no. duplex units. Out of this, 16 no. units are proposed as Social Housing Units and 36 no. are proposed as Affordable Housing Units.</p> <p>Please refer to the submitted details and costs of the proposed 123 no. Part V units that has been prepared by the Applicants. The enclosed Part V proposal was submitted to the Housing Department of South Dublin County Council and a letter confirming the Applicants' engagement with the Housing Department of SDCC was received on 18th November 2025 confirming same – please also refer to same enclosed.</p>
5	<p>Childcare Provision –</p> <p><i>Clarity shall be provided on the total number of places being provided and all documentation should reflect this figure.</i></p>	<p>The proposed crèche, of c.630sq.m. will cater for 148 no. childcare places. Please refer to section 7.14 of this Statement for more details and the submitted Davey + Smith drawing no. D2314-CR-01 "Creche" for details.</p>



6	<p>School Site –</p> <p><i>As per discussion with the Department of Education and Skills, the site, as detailed, is the preferred location for a new school.</i></p>	<p>A site for the future use of a potential school remains reserved as part of the overall development. The Applicants have received a site of c. 1.03Ha to accommodate a school as agreed in principle with the Department of Education and Skills – details are set out in Appendix 1 of the submitted Planning Statement.</p> <p>On the submitted site plan, the following should be noted:</p> <p>The footprint of the school building is based upon a permitted primary school. There is a wayleave traversing the southern part of the “school site”, however, no buildings are proposed on the wayleave.</p> <p>There are no public paths/routes through the site, and it is a self-contained site for the potential, future needs/use of the school.</p> <p>The site layout plan for the school accommodates the 10m biodiversity buffer from the western boundary of the site.</p> <p>Play facilities associated with the needs of the school are also accommodated within the site, as is car and bicycle parking – the numbers of same are indicative.</p>
7	<p>Community Infrastructure –</p> <p><i>The applicant is strongly encouraged to engage with the SDCC Planning Delivery Team regarding the provision of community floorspace prior to submitting the final planning application, with the aim of reaching agreement on the quantum to be levied in lieu of on-site delivery.</i></p>	<p>The Applicants have engaged with SDCC regarding the payment of a development contribution in lieu of providing community uses / floorspace as part of the proposed development. Please refer to section 7.15 of this Planning Statement for more details. The Applicants are fully satisfied to pay a financial contribution in lieu of the provision of community floorspace within the proposed development, to be put towards the cost of providing a community centre in the area, in accordance with the objectives of the South Dublin County Development Plan, 2022-2028.</p>

	<p>Phasing –</p> <p>8 <i>The final application must set out a clear phasing strategy that ensures open spaces are delivered in tandem with each stage of residential development, promoting a balanced and cohesive progression of the site throughout the build-out. The phasing plan shall also be updated to show the timing of the embankment works and the delivery of the northern open space area. The timing for these areas shall be informed by the SSFRA.</i></p>	<p>Please refer to section 11 in the enclosed Planning Statement and drawing no. BHBY-MRM-AR-ZZ-DR-P4-XX-XX-0016 “Site Plan – Phasing” which set out that the proposed development will be carried out over three phases and that each phase will include the necessary and associated infrastructure and open spaces. Notably, Phase One will include <i>inter alia</i> the delivery of the connections to Carrigmore Park to the northwest, all along the eastern boundary of the site, the delivery of the vehicular connection to Carrigmore to the north, Corbally to the east and the access to serve the proposed 10 houses in the south-eastern corner of the site, and the embankment works proposed on the north-eastern corner of the site, are proposed to be constructed prior to occupation of the adjacent buildings/roads and can be constructed concurrently with any adjacent development, which has been confirmed by Kilgallen & Partners who prepared the submitted Site-Specific Flood Risk Assessment (SSFRA).</p>
	<p>Infrastructure and Environmental Services –</p> <p>9 <i>The final application must adequately address all concerns raised by the SDCC Water Services Section, as outlined in Appendix 05 of this report. In addition, the applicant must respond in full to the requirements set out in the report submitted by Uisce Éireann, detailed in Appendix 06, including the provision of a Confirmation of Feasibility that meets the satisfaction of Uisce Éireann. Addressing these matters in a comprehensive and coordinated manner will be essential to facilitate a full and proper assessment of the proposed development.</i></p>	<p>Refer to section 2.8 of the submitted LRD Response Document for full details of how the proposed development has addressed all concerns raised by the SDCC Water Services Section, as outlined in Appendix 05 of the subject LRD Opinion. In addition, a “Confirmation of Feasibility” (CDS24005491) letter has been obtained from Uisce Éireann (UÉ) and is included in Appendix 11.11 of the enclosed Drainage & Water Infrastructure Engineering Report prepared by Roger Mullankey & Associates, Consulting Engineers. Also included in Appendix 11.1 is a 2nd “Confirmation of Feasibility” letter (Ref. DIV25342) from the Diversions section of UÉ confirming that the build over/near and crossings of the existing water infrastructure “can be facilitated”. A submission of drawings was made, and discussions were held with UÉ based on the current design and subject to a successful planning outcome, at connection application stage any further requirements of UÉ will be ascertained and agreed in advance of construction.</p>

10	<p>Natural Heritage –</p> <p><i>The applicant shall address the concerns raised by the SDCC Conservation Officer in the Natural Heritage section of this report. Particular attention should be paid to the hydrogeological assessment, to fully ascertain the subsurface factors governing water volume, water emergence patterns, and water flow/seepage off this sloping site. The final submission should include all relevant and up-to-date environmental and ecological surveys required to facilitate a thorough assessment of the potential impacts on the site's biodiversity and ecological value.</i></p>	<p>Refer to section 2.10 of the submitted LRD Response Document for full details of how the proposed development has addressed all concerns raised by the SDCC Conservation Officer.</p> <p>An EIAR is submitted which provides an assessment of the impacts of the proposed development on soils, geology as well as the landscape – please refer to Chapters 6 & 11 of same for more details.</p> <p>In addition, DNV has prepared the submitted Hydrological and Hydrogeological Risk Assessment Report which is enclosed as Appendix 6.1 in Volume 3 of the submitted, and we refer the reader to same for full details.</p> <p>We also refer the reader to the submitted Marsh Translocation Report prepared by Gannon & Associates, Landscape Architects.</p> <p>The proposed development provides for c.3Ha of the site that will be free from development due to environmental sensitivities, including the biodiversity / riparian buffers created along the eastern and western boundaries of the site. The required 10m minimum setbacks from the top of the banks of the stream along these boundaries is adhered to. We confirm that <u>no development</u> will occur within these buffers. In addition, these buffers are not proposed as open space nor are the areas of same used in the calculation of open space in the proposed development. The central hedgerow is also retained. Please refer to the submitted drawing no. 24212_Boherboy_PA_C_RBZ "Riparian Buffer Zone" prepared by Gannon & Associates Landscape Architects which clearly illustrates the aforementioned biodiversity / riparian buffers.</p>
11	<p>Open Space and Green Infrastructure –</p> <p><i>The applicant is required to address the issues raised by SDCC's Public Realm Section, as summarised in the Open Space and Green Infrastructure section of this report. Particular attention must be given to the northern portion of the site, where existing access is significantly constrained by embankments and steep gradients, including level differences of up to 3m, which hinder inclusive and universal access. Concerns have also been raised regarding the location of play areas within low-lying sections, specifically relating to their usability and functionality during and after rainfall events. In addition, the final proposal should demonstrate the</i></p>	<p>We refer the reader to the submitted Statement of Consistency (Section 7.2) which provides details of the proposed development's compliance with relevant policies, objectives, and guidance on open space and accessibility, as set out in Chapters 8 and 12 of the existing South Dublin County Development Plan, 2022-2028.</p> <p>We refer the reader to the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects which provides details of the proposed play areas, the design of and type of play / equipment being provided in same. In the northern most open space, details and sections of how this space are provided (section 4.3). Section 5.2 of the enclosed Landscape Design Rationale provides details of how this northern most open space will be accessible. The proposed landscaping design has been fully coordinated with the proposed SuDS strategy for the site – refer to section 5.4.</p>



	<p><i>integration of active play elements that cater to a wider age range, promoting inclusive, long-term use of these recreational spaces. The Public Realm Section remains available for further engagement and is open to offline discussions to assist in resolving these matters and support the refinement of the proposal prior to the submission of the final application.</i></p>	<p>In terms of play the proposed development accommodates 4 no. fitness areas, 16 no. equipped and natural play areas and 10 no. spaces where one can relax and have picnics. Drawing no. 24212_Boherboy_PA_B_PP "Play Provision" by Gannon & Associates provides details of all of the proposed play equipment, what age groups they cater for and where they are to be provided on the site.</p> <p>Roger Mularkey & Associates confirm that no gullies are proposed in front of tree pits.</p> <p>Please refer to all of the above mentioned enclosed documents for full details, as well as the following drawings which provide sections through the site/spaces:</p> <ul style="list-style-type: none">▪ Drawing No. 24212_Boherboy_PA_B_D01 "Detail Area 1"▪ Drawing No. 24212_Boherboy_PA_B_D02 "Detail Area 2"▪ Drawing No. 24212_Boherboy_PA_C_CH "Central Hedgerow & Ditch"▪ Drawing No. 24212_Boherboy_PA_C_EWH "East & West Hedgerow & Ditch"▪ Drawing No. 24212_Boherboy_PA_A_FP "Flooding Plan POS"▪ Drawing No. 24212_Boherboy_PA_A_RW "Retaining Wall Locations".
12	<p>Sustainable Movement (Roads) –</p> <p><i>Further consideration shall be given to the report provided by the SDCC Roads Department. Particular attention should be given to the Accessibility Audit requested.</i></p>	<p>O'Herlihy Access Consultancy (OHAC) has prepared the submitted Site Universal Access Statement which confirms that they have been liaising with the design team during the planning stages of this project and are satisfied that the proposed site works will meet the requirements of Part M of the Second Schedule of the Building Regulations and consider a Universal Design Approach looking towards best practice as far as practicable.</p> <p>We refer the reader to section 7.16 of the submitted Planning Statement and the Traffic and Transport Assessment (section 3.4) for details of the proposed car parking. In summary, 861 no. car parking spaces provided for in a mix of on-street and on-curtilage parking. Parking provision for the houses does not exceed the requirements set out Table 12.26: Maximum Parking Rates (Residential Development) of South Dublin County Development Plan 2022-2028.</p> <p>Please refer to the submitted MCORM drawing no. BHBY-MRM-AR-ZZ-DR-P4-XX-XX-0018 "Taking In Charge" for details of the areas of the proposed development that are proposed to be taken in charge upon completion and those areas that will be in the charge of a management company.</p>

		<p>Pinnacle Consulting Engineers have prepared the submitted Construction Management Traffic Plan – please refer to same.</p> <p>Please also refer to the submitted public lighting plans and details prepared by Fallon Design.</p>
13	<p><i>Environmental Considerations –</i></p> <p><i>An EIAR, AA screening assessment, and NIS, if required, shall be submitted with the final application, along with all relevant and up-to-date environmental and ecological surveys required.</i></p>	<p>This LRD Planning Application includes an Environmental Impact Assessment (EIAR) and an Appropriate Assessment Screening Report which confirms that a Natura Impact Statement (NIS) is not required. Within the submitted EIAR, Chapter 5 of same “Biodiversity” provides details of all of the ecological surveys undertaken on the subject site prior to the lodgement of this application for permission – please refer to all of the aforementioned enclosures.</p>

Table 1 – Summary of matters addressed, as required by LRD Opinion Ref. LRDOP003/25

In addition to responding to 13 no. items outlined above, as requested by the Planning Authority, the LRD Opinion notes that prior to commencement the following ought to be addressed:

- **Public Lighting Design**
- **Taking In Charge**
- **Construction Traffic Management Plan**
- **Community Space – Contribution in-lieu**

We confirm that the following required documents are also enclosed as part of this LRD planning application:

- **Public Lighting Design** – refer to the submitted plans and details prepared by Fallon Design.
- **Taking In Charge** - refer to the submitted MCORM drawing no. BHBY-MRM-AR-ZZ-DR-P4-XX-XX-0018 “Taking In Charge” for details of the areas of the proposed development that are proposed to be taken in charge upon completion and those areas that will be in the charge of a management company.
- **Construction Traffic Management Plan** - Pinnacle Consulting Engineers have prepared the submitted Construction Management Traffic Plan – please refer to same.
- **Community Space – Contribution in-lieu** – refer to the preceding section 2.14 (Item 7. Community Infrastructure) and to section 7.15 “Community Facilities” in the enclosed Planning Statement for full details of the Applicants’ intention to pay a development contribution in lieu of the provision of community infrastructure on site.

2.4. Engagement with the Department of Education

In accordance with the Development Plan (and previous Fortunestown LAP) the Applicants have reserved a site (c.1.03Ha) in the north-west part of the overall Boherboy lands for future use as a school site, should the Department of Education. Furthermore, the Applicants engaged with the Department and submitted a final indicative design proposals to demonstrate that on the reserved site, a potential 8-16 classroom primary school can be accommodated on same. An indicative site layout plan for the school site was submitted to the Department of Education by the Applicants on 27th February 2025, with a snapshot of same shown in Fig. 5 below:



Fig. 5 – Indicative site layout plan for school site illustrating the accommodation of a 16 classroom primary school on same

The footprint of the school building shown in Fig. 5 is based upon a permitted primary school. There is a wayleave traversing the southern part of the “school site”, however, no buildings are proposed on the wayleave. There are no public paths/routes through the site, and it is a self-contained site for the potential, future needs/use of the school. The site layout plan for the school accommodates the 10m biodiversity buffer from the western boundary of the site. Play facilities associated with the needs of the school are also accommodated within the site, as is car and bicycle parking – the numbers of same are indicative.



The Department of Education replied via email on 11th April 2025 stating: “*These changes as per the attached document work better and therefore the new proposed layout is agreeable to us*”. A copy of this email is set out in Appendix 1 of this Planning Statement as is a copy of the layout plan submitted to them, which includes the image in Fig. 5.

Taking into account this agreed principle, the enclosed site layout plan includes the agreed indicative site layout plan for a potential, future school site, should the Department of Education confirm their need of same.

3.0 Planning History

This site has been subject to three separate planning applications in the past, under the following planning reference numbers:

1. Ref.s SD15A/0388 & PL06S.247074,
2. Ref. ABP-304828-19,
3. Ref. ABP-313145-22.

The details of these are set out below, in chronological order from the oldest to most recent.

3.1 Ref.s SD15A/0388 & PL06S.247074

Under planning application Ref. SD15A/0388, a residential development of 218 no. dwellings and a crèche on the southern part only, of the overall subject site, was granted permission by South Dublin County Council. This was subject to a third party appeal which was refused by An Bord Pleanála (under Ref. PL06S.247074) for two reasons, which were:

Reason No. 1 of Refusal:

Having regard to the level of flooding identified on the application lands in the Fortunestown Local Area Plan (Appendix 6, Flood Risk Mapping) and in the absence of hydrological modelling and a detailed site-specific flood risk assessment that would clearly demonstrate that the proposed development would not itself be at risk of flooding, or that it would not give rise to an increased risk of flooding downstream, the Board is not satisfied that the site is suitable for development across much of its extent. It is considered that the proposed development would, therefore, be contrary to the provisions of the “Planning System and Flood Risk Management-Guidelines for Planning Authorities” (2009) and would be contrary to the proper planning and sustainable development of the area.

Commentary on Reason for Refusal No. 1:

A Site-Specific Flood Risk Assessment (SSFRA) of each of the developments proposed under Ref.s ABP-304828-19 and ABP-313145-22 was carried out by Kilgallen & Partners Consulting Engineers in accordance with the document ‘Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)’ (hereafter ‘FRG’). We note that under the most recent decision of An Bord Pleanála under Ref. ABP-313145-22, the Inspector stated: “*The report from the Environmental Services Department has no objection in respect of Flood Risk subject to conditions. I am generally satisfied that the with the details of the SFRA, and subject to condition the development will not result in a flood risk. I refer the Board to section commencing 11.10 as regards Flood Risk analysis. In summary, following the Site-Specific Flood Risk Assessment, it has been determined that the application was subject to and passed the Development Management Justification Test as required under the OPW’s The Planning System and Flood Risk Management 2009 (the Guidelines)*”. We acknowledge that whilst the most recent SHD planning application was refused, the reason for refusal was not based upon flood risk.



This LRD planning application also includes a SSFRA, which confirms that the site is located in the catchment of a tributary stream of the Camac River. It is this stream which flows along the eastern and northern boundary of the site. The stream enters the site at the southern boundary (i.e. from a culvert under the Boherboy Road), flows in a northerly direction along the eastern boundary, turns in a westerly direction upon meeting the northern boundary and discharges to a culvert at the north-western corner of the site.

The enclosed assessment carried out by Kilgallen and Partners has informed the design of the proposed development so as to avoid any potential of flooding. In addition, the layout of the open space to the northern end of the development has been designed to cater for potential extreme rainfall events and then revert to usable open space during normal weather conditions.

The SSFRA included appropriate factors to allow for the potential impact of climate change. The Flood Risk Management Guidelines (FRG) require the appropriateness of proposals to develop lands at risk of flooding to be assessed using the Development Management Justification Test. Accordingly, the proposed development has been subject to and found to satisfy the various criteria of this test.

The SSFRA concludes that the proposed development is not at risk of flooding and will not increase flood risk elsewhere. In accordance with the Flood Risk Management Guidelines, the proposed development is therefore appropriate from a flood risk perspective.

Reason No. 2 of Refusal:

Having regard to:

- *the South Dublin County Development Plan 2016-2022,*
- *the removal of hedgerows and the resultant lack of an integrated biodiversity network as identified as an Objective in the Fortunestown Local Area Plan,*
- *the objectives set out in the Design Manual for Urban Roads and Streets (DMURS),*
- *the detailed guidance for the site with regard to urban design as set out in the Local Area Plan;*
- *to the peripheral location of the main active public open space area, and*
- *to the unsatisfactory quantum of rear private amenity space resulting in substandard residential amenity for future occupants,*

the Board considered that the proposed development would be contrary to the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) 2009, the Design Manual for Urban Roads and Streets (DMURS) and the South Dublin County Development Plan 2016-2022 which promote the high quality design, and location of public and private open space in addition to detailed guidance on street design, road widths, the establishment of “home zones” and a clear hierarchy of spaces. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area

Commentary on Response to Reason No. 2:

It should be noted that the planning application made under Ref.s SD15A/0388 & PL06S.247074 represented “Phase 1” of the overall development of the subject site and did not cater for housing throughout the entire site as defined by the Applicants’ ownership. A significant departure from that previously proposed under Ref.s SD15A/0388 & PL06S.247074, was put forward for permission under Ref.s ABP-304828-19 and ABP-313145-22 in terms of layout,



density, mix of unit types, road hierarchy, and location and configuration of public open spaces. The subject LRD planning application follows the same approach as the previous SHD applications in terms of covering the full extent of the land ownership. It is considered that the proposal to develop the Boherboy lands in their entirety, including various amendments to the layout in terms of building height, density and unit / dwelling mix, etc. provides for a holistic approach to the development of the Boherboy lands and that this addresses the previous reason for refusal. In addition, the current proposal represents the proposed development of the entirety of the Boherboy Neighbourhood, notwithstanding the expiry of the previous relevant Fortunestown LAP, 2012 and the above-mentioned South Dublin County Development Plan, 2016-2022.

3.2 Ref. ABP-304828-19

Under Ref. ABP-304828-19, a Strategic Housing Development planning application consisting of 609 no. residential units, comprised of 267 no. houses, 158 no. duplex units and 187 no. apartments, crèche and all associated site development works, open spaces etc. was submitted for permission in July 2019. A decision to refuse permission was issued by An Bord Pleanála on 30th September 2019, based upon three reasons, which are as follows:

Reason No. 1 of Refusal:

The Urban Design Manual – a Best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in 2009, to accompany the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, includes key criteria such as context, connections, inclusivity, variety and distinctiveness. It is considered that the development as proposed results in a poor design concept that is substandard in its form and layout and lacks variety and distinctiveness. Also, the proposed development would not be in accordance with the Design Manual for Urban Roads and Streets issued by the Department of Transport, Tourism and Sport, and the Department of the Environment, Community and Local Government in 2013.

Commentary on Response to Reason No. 1:

The Sustainable Residential Development in Urban Areas (SRD) Guidelines and its accompanying document, Urban Design Manual has now been replaced by the Guidelines for Planning Authorities on Sustainable and Compact Settlement (2024), which contains a new set of design guidelines for residential development. Compliance with these new Guidelines is set out in detail in section 5 of the accompanying Statement of Consistency report, as well as the enclosed Architectural & Urban Design Statement. Some of the key principles of the design approach are as follows:

- The site layout provides a series of interconnected neighbourhoods.
- There is a mix of housing typology and size.
- There is a clear and legible road and movement strategy, in compliance with DMURS, which includes pedestrian and cyclist connections along desire lines to public transport and local services and facilities.
- Creation of strong, urban building frontage onto the main avenue with a retained and augmented green feature created by the existing (central) hedgerow to the east.
- In response to topography and context, varied building heights are proposed across the site.
- Creation of a variety of open spaces outside of / separate to the protected 10m min riparian buffer along the Corbally Stream thus respecting the required 10m biodiversity strip.
- A 10m buffer is also proposed along the western boundary of the site thus retaining the existing hedgerow and trees to the western boundary.



Reason No. 2 of Refusal:

Having regard to the proximity of the Luas stops at Saggart and Fortunestown the Board considered that the proposed development with a net density of 30 number units per hectare to the south of the site would not be developed at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage and, therefore, the density proposed would be contrary to the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, as they relate to cities and towns and in particular to sites serviced by existing and planned public transport. The proposed development would, therefore, be contrary to these Ministerial Guidelines and contrary to the proper planning and sustainable development of the area.

Commentary on Response to Reason No. 2:

The previously proposed SHD development (ABP-304828-19) of 609 no. dwellings, on an overall site area of 17.6Ha, produced a gross density of development of 34.6 units per hectare. However, in the northern part of the site, an area of 1.28Ha was reserved for a school site, and therefore, in accordance with the relevant guidelines at that time, 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, this was discounted from the gross development area. In addition, a green corridor along the eastern boundary of the site was also discounted as it was a significant landscape buffer strip that was proposed to adjoin and connect to the District / Carrigmore Park, thus ultimately acting as an open space serving the wider area and occupied an area of 1.3Ha. Therefore, by discounting this 1.3Ha of open space and the school site (1.28Ha), resulted in a net developable area of c.15Ha which produced a net density of development of c. 40.6 units per hectare across the entire site. However, notwithstanding the previously proposed overall net density of c.40.6 units per hectare, a decision to refuse was issued citing “a net density of 30 number units per hectare to the south of the site”.

The net density of 30 units per hectare reference in reason for refusal no. 2 as above is significantly improved upon in the current proposal. The net density of the proposed development is c.50 units per hectare across the entire site, which accords with the more up to date national guidance as set out in the Compact Settlements Guidelines, which requires a net density of between 40 and 80 units per hectare for a site such as this.

The net density is calculated in accordance with the guidance set out in the Compact Settlement Guidelines, whereby the following areas on the site have been discounted in order to calculate the net developable area of the site and the resultant density:

- Gross site area of c.18.7 hectares,
- Land reserved for a future school (c.1.03 Ha),
- Designated flood zone (c.0.69Ha),
- Two no. drainage wayleaves traversing the site (c.1.3Ha),
- South-western portion above the 120m contour line (c.0.5 Ha),
- Hedgerow along the western boundary and its 10m buffer zone (c. 0.65Ha),
- 10m buffer from the top of the stream bank along the eastern boundary (c. 1.24Ha)
- Area occupied by central ditch (c.0.8Ha)
- The centrally located north-south "Link Street" (c. 0.4Ha).

The above provides a total of c.6.6 hectares, and therefore a net site area for density purposes of c.12.2 hectares. Based upon the discounting of these “undevlopable” areas on the overall site, a net resultant density of 50 dwellings per hectare is achieved across the entire site. This aligns with the Compact Settlement Guidelines, which recommend a range of 40–80 dwellings per hectare on the subject site.

We note in their assessment of the most recent SHD (Ref. ABP-313145-22, dated 29th May 2025) that the An Bord Pleanála Inspector noted: “*the references to the density and policy objectives of the Fortunestown LAP, and the Sustainable Residential Development in Urban Areas Guidelines (2009), and the alleged material contravention of*



same, however, this LAP has expired, and the 2009 Guidelines have been replaced by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)".

The Inspector also went onto say: "In my view, the density as currently proposed on this site addresses the previous reason for refusal in respect to density, accords with the Compact Settlement Guidelines which require a range of 35 – 50 (net), is consistent with the density upon which the core strategy of the Development Plan is based, and provides for an efficient use of this residential zoned land".

The Inspector concluded that: "I am satisfied that the current proposal provides for an acceptable density of the overall site, in particular to the southern portion of the site, and provides an appropriate density of residential development at this site and accords with the Development Plan, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, and National Policy in this regard".

Reason No. 3 of Refusal:

It is considered that the Environmental Impact Assessment Report, together with the documentation submitted with the application, does not identify or describe adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment. The Board is not satisfied that the information contained in the Environmental Impact Assessment Report complies with the provisions of European Union Directive 2014/52/EU amending Directive 2011/92/EU, particularly with regard to biodiversity, water, traffic and landscape and visual impact, and accordingly it is considered that the Board cannot be satisfied that the proposed development would not have significant adverse effects on the environment.

Commentary on Response to Reason No. 3:

An Environmental Impact Assessment Report (EIAR) has been prepared and is submitted as an accompanying document to this LRD planning application, ensuring that there is an adequate description of the direct, indirect, secondary and cumulative effects of the proposed development on the environment, particularly with regard to biodiversity, water, traffic and landscape and visual impact, as well as anticipating all of the effects on the environment caused by development. The submitted EIAR has considered the likely significant effects of the development under the headings below, which generally follow the order of the factors set out in Article 3 of the EIA Directive 2014/52/EU.

3.3 Ref. ABP-313145-22

Under Ref. ABP-313145-22, a Strategic Housing Development (SHD) planning application consisting of 655 no. residential units, comprised of 257 no. 2, 3 & 4 bed, 2 & 3 storey detached, semi-detached & terraced houses, 152 no. 1, 2 & 3 bed duplex units in 17 no. 2-3, 3-4 & 4 storey blocks, and 246 no. 1, 2 & 3 bed apartments in 9 no. buildings ranging in height from 2, 2-5, 4-5 & 5 storeys, and a 2 storey crèche (693m²), and all associated site development works, open spaces etc. was submitted to An Bord Pleanála for permission in March 2022. A decision to refuse permission was issued by An Coimisiún Pleanála on 23rd July 2025 for the following reason:

Reason No. 1 of Refusal:

It is considered that the Environmental Impact Assessment Report, together with the documentation submitted with the application, does not identify or describe adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment. The Board is not satisfied that the information contained in the Environmental Impact Assessment Report complies with the provisions of European Union Directive 2014/52/EU amending Directive 2011/92/EU, particularly with regard to biodiversity, water, traffic and landscape and visual impact, and accordingly it is considered that the Board cannot be satisfied that the proposed development would not have significant adverse effects on the environment".



Commentary on Response to Reason No. 1:

It should be noted that this SHD planning application included a proposal to access the development via one no. vehicular access point from the Boherboy Road, along with proposed upgrade works to Boherboy Road to include the provision of a roadside footpath along the front of the site at the Boherboy Road, continuing eastwards to the junction with the N81 Blessington Road (for an overall distance of c.370m). The previous proposal to upgrade the Boherboy Road was a requirement of the Fortunestown LAP, 2012, which has now expired. In the interim and as part of the extensive pre-planning consultation undertaken with SDCC for the proposed LRD on the subject lands at Boherboy, it has been agreed in principle that this road upgrade is no longer necessary and that the current access arrangements put forward as part of this LRD planning application are satisfactory and appropriate. As such, under the current LRD proposal, it is not proposed to upgrade the Boherboy Road, and such a proposal does not form part of this application for permission.

Furthermore, an Environmental Impact Assessment Report (EIAR) has been prepared and is submitted as an accompanying document to this LRD planning application, ensuring that there is an adequate description of the direct, indirect, secondary and cumulative effects of the proposed development on the environment, as well as anticipating all of the effects on the environment caused by development. The submitted EIAR has considered the likely significant effects of the development under the headings below, which generally follow the order of the factors set out in Article 3 of the EIA Directive 2014/52/EU.

4.0 Planning Context

4.1 South Dublin County Development Plan 2022-2028

4.1.1 Land-Use Zoning

The subject site is currently zoned objective “Res-N”: *“To provide for new residential communities in accordance with approved area plans”* in the existing South Dublin County Development Plan, 2022-2028 (hereafter “CDP”). The current proposal for the development of 611 no. residential dwellings and a childcare facility on the subject site is therefore considered appropriate and in compliance with the land-use zoning objective attached to the site.

At the north-eastern part of the application site, the red line of application extends into Carrigmore Park which is currently zoned objective “OS”: *“To preserve and provide for open space and recreational amenities”* – this is included in the application for infrastructural purposes i.e. to accommodate an extension of proposed foul drainage from the northern end of the Boherboy site across Carrigmore Park to the east in order to connect into existing drainage infrastructure. It is put forward that given the proposed sewer pipe will be located underground, the provision of this use is compatible with the open space land use zoning objective and therefore no material contravention issues arise in relation to same. We also note that Public Services, defined in Appendix 6 of the Development Plan as including *“all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers...”* are open for consideration under this zoning objective. The proposed infrastructure is ancillary to residential development, which is only open for consideration in accordance with H3 Objective 4, community led housing for older persons and social / affordable housing, therefore it is considered that the proposed sewer on “OS” land will not affect the future utility of the “OS” lands and no, permanent, above ground impacts will occur directly as a result of this development. A letter of consent from South Dublin County Council to the inclusion of the land required to accommodate the proposed sewer is enclosed with this LRD application.

4.1.2 Core Strategy

Chapter 2 of the existing CDP contains the “Core Strategy and Settlement Strategy” for the county during the life of the CDP, the purpose of which is to demonstrate the quantum and location of development in the county aligns with national and regional planning policy. The Core Strategy and Settlement Strategy quantitatively demonstrates how much land is required to meet the residential and employment needs of an additional 45,000 people (approximate) up to the year 2028. The existing CDP states: “*To provide for this level of growth in line with National policy, a need for 23,730 new homes between the Census year 2016 to 2028 within the County has been identified*”.

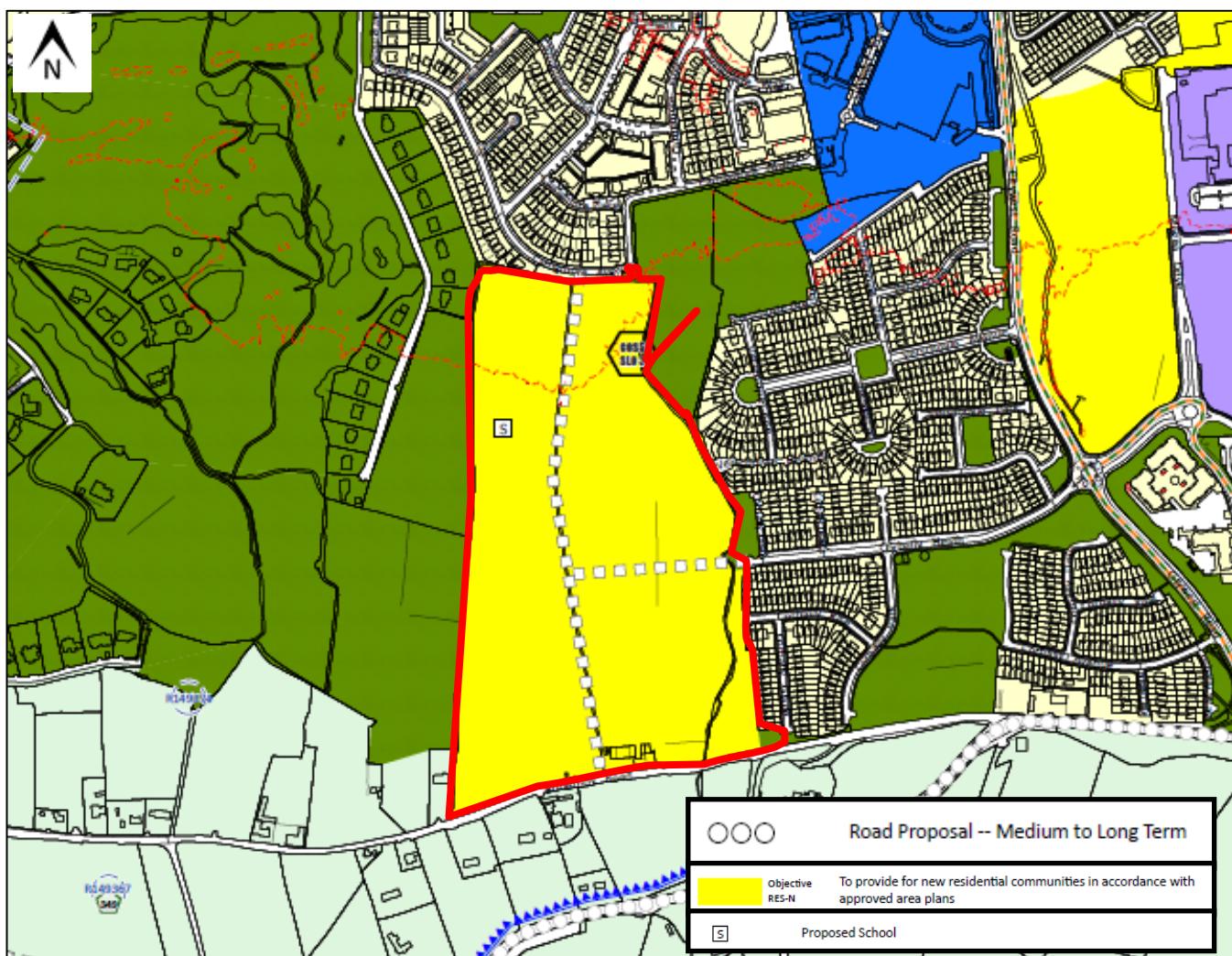


Fig. 6 - Copy of South Dublin County Development Plan Land Use Zoning Map 8 for Subject Site,
with site indicatively outlined in red.

Section 2.6 of the Core Strategy identifies land capacity (i.e. land that is available for development to meet the requirements of the projected population) and states a “Land Capacity” analysis was carried out by the Planning Department to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the previous 2016-2022 CDP. Figure 9 ‘Housing Capacity Sites’ of the existing CDP (page 51) identifies the subject site as being located on a ‘housing capacity site’. The Citywest area is also identified as being part of the ‘Dublin City and Suburbs’ settlement typology in Table 14 of the existing CDP. ‘Dublin City and Suburbs’ is defined as an: “*International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.*”

Figure 9 of the County Development Plan identifies 'Land Capacity Sites', which reflects the location of lands zoned for residential development to meet the population targets of the Core Strategy. As illustrated in Fig. 7 below, the application site is identified as a Land Capacity Site.

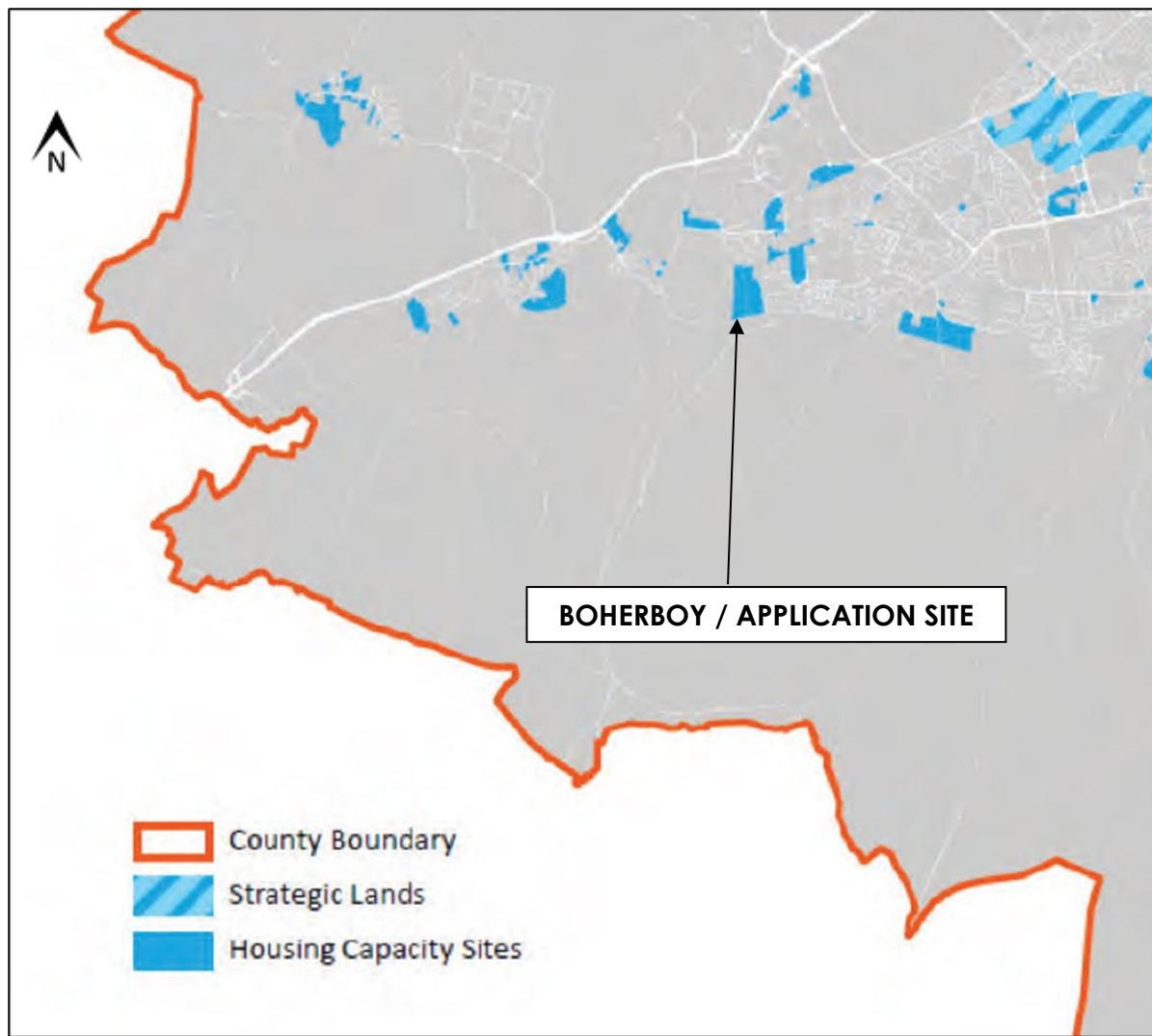


Fig. 7 - Copy of Figure 9 of the South Dublin County Development 2022 - 2028

Under "Key Urban Centres within Dublin City and Suburbs", the County Development Plan states the following:

"The relatively new district area, in Fortunestown/Citywest has been developing over the last number of years at a significant pace and is subject to a Local Area Plan. Its proximity to the Citywest Business Park has facilitated the delivery of housing and jobs beside each other which is supported by the Red Luas Line. The level 3 District Centre of Citywest shopping centre forms the centre of the new district area within and contiguous to the Dublin City and suburbs boundary. It has been one of the most active areas in terms of the delivery of housing for the County during the 2016 – 2022 Development Plan period. The delivery of commensurate levels of social and physical infrastructure to match recent and continued growth will be promoted in this area".

Figure 11 of the County Development Plan (see extract overleaf) focuses on the neighbourhoods in South Dublin within the 'Dublin City and Suburbs' settlement, and as can be seen on same, Citywest is included and the area to the south and west of Citywest is identified as a 'MASP Residential Growth Area'.

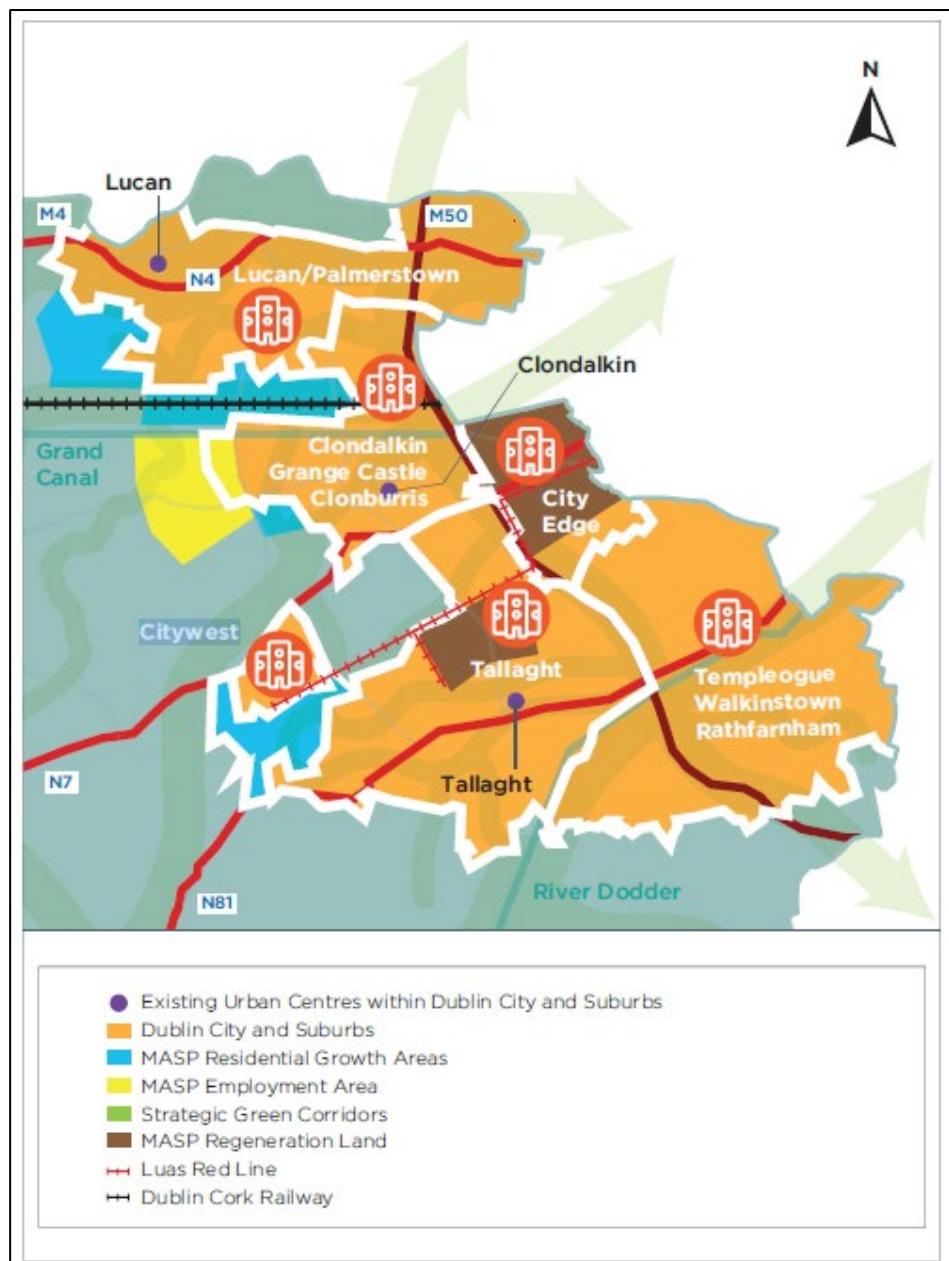


Fig. 8 - Copy of Figure 11 of the South Dublin County Development Plan 2022 – 2028

4.1.3 The CDP and the Fortunestown Local Area Plan, 2012.

The subject application site was previously subject to the Fortunestown Local Area Plan, May 2012 (Extended), however, this LAP has since lapsed and no alternative LAP has been prepared for the area, nor for the subject lands at Boherboy. The “Boherboy Neighbourhood” as previously identified in the Fortunestown LAP consisted entirely of the two fields that are now the subject of this application for permission. We note that the current land use zoning objective attached to the site under the CDP is “Res-N”: *“To provide for new residential communities in accordance with approved area plans”*, however, whilst the 2012 LAP has since lapsed, several of the former LAP requirements have been carried through as Specific Local Objectives (SLOs) within the current CDP, all of which are detailed in the accompanying Statement of Consistency (section 7.2), and as follows:



- **COS5 SLO2:** “To require the provision of public open space and to ensure that the location, layout and design of the public open space facilitates the delivery of a sports pitch to facilitate multiuse within the Boherboy lands in the south part of the Fortunestown LAP lands, alongside the residential development that is permitted on these lands”.
- **Road Proposal – 6 Year – Various Streets within the Fortunestown LAP**

It is acknowledged that the relevant land use zoning objective “RES-N” seeks: “*To provide for new residential communities in accordance with approved area plans*”, and that there is no current approved area plan in place applicable to the subject site. However, we refer to another approved LRD to the east in the townlands of Bohernabreena, Oldcourt and Killininny, under the same CDP, was subject to a similar issue. That LRD (under Ref.s LRD24A/0007 and ABP-321419-24, approved on 8th April 2025) was granted by An Bord Pleanála and at the time of granting permission, those lands were not subject to an approved area plan as the previous Ballycullen-Oldcourt Local Area Plan, 2014 had expired and similar to the subject site at Boherboy, no new / subsequent LAP had been prepared or was in place.

Subject to a third party appeal subsequent to the decision of SDCC to issue a notification of a decision to grant permission, the An Bord Pleanála Inspector recommended a decision to refuse permission for the aforementioned LRD (Ref. ABP-321419-24) for one reason only, as follows: “*The majority of the subject site is zoned ‘RES-N – New Residential’, the objective of which is to ‘provide for new residential communities in accordance with approved area plans’. Having regard to the recent expiry of the Ballycullen - Oldcourt Local Area Plan 2014, in the context of the western LAP lands, the proposed development cannot comply with this zoning objective applying to the site. Therefore, the proposed development would be contrary to the proper planning and sustainable development of the area*”. However, in deciding not to accept the Inspector’s recommendation and to issue an Order to Grant Permission for the LRD, the Board addressed the issue of the previous LAP / “approved area plan” having expired as follows:

“*The sole concern of the inspector related to the full wording of the RES-N zoning which relates to the majority of the subject site, which has the objective, to provide for new residential communities in accordance with approved area plans’. The Board considered the facts of the case, along with the detail of the overall statutory development plan. In this regard the Board noted that the development plan does not set out what approved area plans may mean in terms of precise procedural exercises, and whether for example, any such approved plan might relate to a specific application site and project, or to an overall identified zoned land area and what form approval of any such area plan should take (for example it may be a plan conceived by the applicant, perhaps with input from the planning authority and noted by the Council). Furthermore, and in any case the Board noted that the subject site and wider lands also zoned RES-N have previously been the subject of a formally adopted Local Area Plan (LAP), statutorily approved, which provides a fully usable base of detail for the rational layout and design of these subject lands. While this plan may have recently expired, it is evident from the detail within the application and appeal, that the proposed development has evolved in accordance with the principles set out therein. Indeed, it is noted that planning permissions have been granted both on the subject site and within the wider area for schemes which reflect the content of this LAP. It is also noted that the current county development plan incorporates a specific road objective across the subject site. This road objective reflects that set out in the LAP*”.

The Board went onto state: “*In this regard the Board determined that it is reasonable to deduce that the LAP is in the manner of an approved area plan within the overall meaning of development plan zoning objective RES-N and on the facts of this case which propose a development which reflects the layout and design principles from that area plan, that a grant of permission in this instance is warranted and would not be inconsistent with the spirit and intent of the overall wording of zoning objective RES-N. This reasonable conclusion is affirmed by reference to case precedent on separate lands also zoned RES-N and as determined by the planning authority. Planning permission LRD23A/0001 was granted by South Dublin County Council in 2023. The planning officer’s report in that case noted that a Local Area Plan that was approved for the area within which that application site was located had expired in 2022. The planning authority stated that ‘a new plan has not yet been formulated for the area however, the scheme*

has evolved in accordance with the Fortunestown LAP, and it is considered that this satisfies the requirements of the RES-N zoning objective'. This is considered a reasonable and appropriate approach consistent with the principles of proper planning and sustainable development and fully allowable by reference to the broad meaning of the full wording of RES-N. That LRD case as determined by the planning authority, offers an appropriate definition of approved area plan for the purposes of the RES-N zoning objective. The Board considered that the current case is comparable".

The Board also noted that the LRD, in the townlands of Bohernabreena, Oldcourt and Killininny, "the zoning of the site permits residential development; that the Core Strategy and Housing Capacity set out within the development plan includes reference to RES-N lands as part of the zoned land resource allocated for housing development. Furthermore, the Board noted that the Oldcourt-Ballycullen Local Area Plan, which was approved, while now expired, offers a key set of layout and design principles, from which the proposed development has evolved. It is also noted that any approved area plan in whatever meaning, including an adopted LAP will always be subservient to the policies and objectives of the statutory development plan".

The Board concluded: "In conclusion the Board concluded, differently to the recommendation of the inspector, that the proposed development, on its facts and by reference to the overall meaning of the zoning objective and associated provisions of the statutory development plan, can be deemed to comply with the zoning objective in this instance. The proposed development is located on lands the zoning of which facilitates its use for housing, and having regard to the nature, scale, form and extent of development, it is considered to be in accordance with the proper planning and sustainable development of the area".

The context of the subject site and LRD application is similar to that outlined above under permitted Ref.s LRD24A/0007 and ABP-321419-24, whereby the previous LAP has expired and there is no current LAP in place. The subject site at Boherboy is the last significant, zoned, undeveloped land parcel under the old Fortunestown LAP. Many of the design / development parameters set out in that LAP have been (a) included in the current development proposal now put forward for permission and (b) have been carried forward into the current CDP – i.e. reserved school site, roads objectives to the north connecting into Carrigmore and east connecting into Corbally etc. It is evident in assessing all relevant factors in this LRD application for permission e.g. design, layout, green infrastructure, biodiversity, accessibility etc. that the site layout plan and design principles have all derived from the previous Fortunestown LAP.

Furthermore, it is put forward that the current land use zoning objective "RES-N" permits residential development. The current CDP and its Core Strategy, as well as its identification of the subject lands at Boherboy as being a "Housing Capacity Site", includes reference to RES-N lands as part of the zoned land resource allocated for housing development.

In addition to the above, we note that the Planning Authority's LRD Opinion received for the subject development proposal (Ref. LRDOP003/25) has had regard to this issue and acknowledges that it is "directly transferrable to this current LRD application", for the following reasons:

- **"Lack of Conflict with the County Development Plan:** The Board noted that the South Dublin County Development Plan 2022-2028 doesn't actually provide any direction on what is or is not meant by the term "Approved Area Plan" from a procedural perspective meaning that there was no conflict with same.
- **Continuation of the Previously Approved LAP Objectives:** Whilst the LAP for the application site had expired, the proposal continued many of the objectives (including those relating to design and layout) of the expired LAP, meaning that it was in accordance with a previously approved Local Area Plan for the area and therefore a grant was warranted "and would not be inconsistent with the spirit and intent of the overall wording of zoning objective RES-N".



- **Delivery of Roads Objectives within the Adopted County Development Plan:** *The proposal delivered a new Road that was identified as an objective within the approved South Dublin County Development Plan 2022-2028.*
- **Planning Precedence:** *It noted that the Council had previously supported an LRD application on RES-N zoned lands in 2023 in which the former LAP for the application site (i.e. the Fortunestown LAP) had expired (SDCC Ref: LRD23A/0001). It noted that in reaching its decision for LRD23A/0001, the Planning Authority had concluded that whilst the LAP had expired, the proposal was deemed to be in line with several of the objectives of the LAP and was therefore deemed to satisfy the RES-N zoning objective. The Board went on to conclude that such an approach to development on RES-N land was “a reasonable and appropriate approach consistent with the principles of proper planning and sustainable development and fully allowable by reference to the board meaning of the full wording of RES-N” and offered the Board with an appropriate definition as to what was meant by an approved area plan for the purposes of the RES-N zoning objective”.*

NOTE: the permitted development under Ref. LRD23A/0001 is on land that was also previously subject to the 2012 Fortunestown LAP, with the Planning Authority granting permission for 384 no. dwellings and a creche in March 2023, subsequent to the expiry of the LAP in May 2022.

In addition to the above, the Planning Authority's LRD Opinion received for the subject development proposal (Ref. LRDOP003/25) states: *“The Planning Authority can now confirm that the purpose of including the term “approved area plan” within the RES-N zoning objective in the CDP was to avoid piecemeal development. It sought to avoid proposals which did not include the full ‘RES-N zoning parcel’ coming forward in isolation of any understanding of how it would later fit with the remainder of the ‘RES-N zoning parcel’ in terms of layout, access, permeability etc. The reference was designed to encourage such applicants in coming forward with additional masterplan/framework context. It was accepted that for those sites that brought forward a complete RES-N zoning parcel, that such an exercise was not necessary”.*

The Planning Authority goes onto state that in relation to the current LRD proposal on the Boherboy site it *“is satisfied, that notwithstanding the fact that the Fortunestown LAP has now expired, that the current proposal, subject to it meeting each of the other relevant objectives of the CDP, meets the intent of an “approved area plan” for the following reasons:*

- **Extent of the RES-N Land Parcel:** *The proposal relates to the full RES-N ‘Zoning Parcel. Following earlier feedback from the Planning Authority on the need to bring this ‘zoning parcel’ forward in a joint and holistic manner, both applicants came together to prepare a combined proposal covering the full zoning parcel, other than for the reserved school site, which remains available for the Department of Education to bring forward as and when the need arises. Notwithstanding the fact that the school is not yet coming forward, the applicant has shown their own proposal in the context of the school site and has actively engaged with the Department of Education and Skills (DES) to ensure it has no objection to the proposal.*
- **Relationship with the Surrounding Area:** *The applicant has been working with the Planning Authority over the design of the proposed scheme for several years, taking on board design advice in relation to how the site should be accessed from a vehicular and pedestrian perspective, the locations of height across the site, the retention of key features etc.*
- **Planning Precedence:** *As noted above, An Bord Pleanála concluded as part of its assessment of SDCC Ref LRD24A/0007 / ABP Ref ABP-321419-24 that such an approach to development on the RES-N sites was a “reasonable and appropriate approach consistent with the principles of proper planning and sustainable development and fully allowable by reference to the board meaning of the full wording of RES-N”.*

The Planning Authority's LRD Opinion received for the subject development proposal (Ref. LRDOP003/25) concludes: *"In summary, whilst additional refinement/clarity is still needed on some items (discussed in further detail below), the Planning Authority is satisfied that, the proposed land uses can be facilitated on the site, subject to them being in accordance with the relevant policies and objectives contained within the CDP and that sufficient detail has been provided by the applicant as part of the submitted documentation to satisfy the "approved area plan" requirements per the meaning of the RES-N Zoning objective".*

As previously detailed, the subject site is located within the lands previously subject to the Fortunestown LAP, 2012, now expired. We note from their assessment that of the LRD to the east in the townlands of Bohernabreena, Oldcourt and Killininny this year, whereby the relevant LAP for that area had also expired, that An Bord Pleanála stated *"any approved area plan in whatever meaning, including an adopted LAP will always be subservient to the policies and objectives of the statutory development plan"*.

The current County Development Plan, 2022-2028, includes a number of references to the Fortunestown / Citywest area within which the subject site is located, as well as various objectives, such as *inter alia*:

- **QDP14 SLO1** - *To ensure the sustainable long-term growth of Citywest that promotes and facilitates the development of the Citywest/Fortunestown area in accordance with the Fortunestown Local Area Plan ensuring that phasing is not contravened and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.*
- **SM4 Objective 7** - *To implement the Six Year Roads Programme set out under Table 7.5 and to work towards the implementation of the Medium to Long Term Roads Objectives under Table 7.6 where feasible and subject to funding. (We note that the relevant CDP land use zoning map identifies a north south and east west link, both six-year road objectives. Table 7.5 of the County Development Plan refers to "Formation of a strategic street network providing access to the Fortunestown LAP lands". The proposed development delivers these roads objectives on the subject site).*
- **COS5 SLO2** - *To require the provision of public open space and to ensure that the location, layout and design of the public open space facilitates the delivery of a sports pitch to facilitate multiuse within the Boherboy lands in the south part of the Fortunestown LAP lands, alongside the residential development that is permitted on these lands. (With regard to the above, SDCC approved a Part 8 scheme to satisfy this SLO on the 11th December 2023. The Part 8 approves extensive upgrades to the facilities at Carrigmore Park to fully satisfy the SLO).*

The above objectives are in addition to the reservation of a school site on the Boherboy lands for future use by the Department of Education (upon confirmation of their need for same) which was originally an objective of the 2012 LAP but is now an objective of the CDP.

Whilst expired, the Fortunestown LAP also contained the following objectives that have been incorporated into the design of the LRD now put forward for permission, thus demonstrating that the proposed development is in line with several of the objectives of the LAP and therefore satisfies the current RES-N zoning objective attached to the site:

- i. *Create open ended routes through existing and new development in a manner that ensures greater permeability and convenient pedestrian access to community facilities, schools, open spaces, shopping facilities, local employment and public transport stops (**Objective AM15**).*
- ii. *Create an integrated network of biodiversity strips through the Plan Lands by way of linking, preserving and incorporating existing hedgerows (especially those at Boherboy and Cheeverstown), wildlife corridors, green corridors and existing streams with a necklace of parks in a manner that forms a link between the Plan Lands and the Dublin Mountains. All developments relating to planting and water features should be cognisant of the potential for creating bird hazard to aviation. (**Objective GI1**)*



- iii. *Ensure that each of the neighbourhoods throughout the Plan Lands will be provided with green spaces that each have a clear role or function and fits within the plan's hierarchy and network of linked spaces as outlined in Table 5.1. (Objective GI2)*
- iv. *Ensure that all development proposals maximise the opportunities for enhancement of existing ecology and biodiversity and are accompanied by a full ecological assessment, carried out by a suitably qualified professional, that includes measures to enhance ecology and biodiversity and avoid or minimise loss to local ecology and biodiversity. (Objective GI3)*
- v. *A 10 metre (min) biodiversity strip (measured from the top of the bank) shall be maintained on both sides of the sections of watercourse that are designated for preservation under the Local Area Plan, for flood management, landscape and biodiversity reasons. These biodiversity strips shall protect, improve and enhance the natural character of the streams and accommodate pedestrian and cycle corridors where possible. Culverting of sections of watercourses that are designated for preservation will not be permitted. Limited sections of streams may be sensitively diverted where appropriate with the highest standards of engineering design and environmental mitigation to avoid significant negative environmental impact, taking full account of flood risk assessments etc. (Objective GI4)*
- vi. *The use of SUDS is a requirement for all new developments in order to reduce surface water run-off and to minimise the risk of flooding of the Plan Lands and surrounding lands. Existing springs will be protected and maintained and incorporated into SUDS. (Objective GI5)*
- vii. *All planning applications for residential and/or commercial floorspace on sites in areas at risk of flooding shall be accompanied by a Flood Risk Assessment that is carried out at the site-specific level in accordance with 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' (2009). The scope of flood risk assessment shall depend on the type and scale of development and the sensitivity of the area. (Objective GI7)*
- viii. *Development of the Boherboy, Fortunestown Centre and Saggart- Cooldown Commons neighbourhoods shall each include for the provision of a primary school site (three in total) that measures at least one hectare. (Objective LUD3)*
- ix. *Require planning applications for any building(s), street(s) or space(s) to be accompanied by a masterplan layout drawing that details how the proposed building(s), streets(s) or space(s) fits within the framework for the neighbourhood to which they relate in terms of accessibility and movement; integration of development; density and land use; green infrastructure and built form. These framework elements can be varied in terms of precise location and design provided that they conform to the principles and guidance set out in this Local Area Plan. Existing utilities should be accommodated between blocks and under streets. (Objective F1)*
- x. *Ensure that each neighbourhood is developed with open ended and integrated pedestrian and cycle routes that link with the Fortunestown Centre and adjacent neighbourhoods. (Objective F2)*
- xi. *The first phase of development in the Boherboy Neighbourhood shall include for through routes to the Carrigmore and Saggart Abbey estates in a manner that provides indirect access from the Boherboy Neighbourhood onto Fortunestown Lane, to the Fortunestown and Saggart Luas stops and onto Citywest Avenue. (Objective BN1)*
- xii. *A pedestrian and cyclist link shall be provided between the first phase of development in the Boherboy Neighbourhood and the district park to the rear (south-west) of the Citywest Shopping Centre. (Objective BN2)*



- xiii. *Development of the Boherboy Neighbourhood shall include for cyclist and pedestrian circuit routes that link the District Park with the Boherboy Road via a choice of routes. (Objective BN3).*
- xiv. *Densities at the upper end of the scale shall only be located in the northern areas of the Boherboy Neighbourhood subject to the achievement of vehicular access through the Carrigmore Estate and pedestrian access through the District Park and District Centre. The lower densities shall be implemented in the southern areas of the neighbourhood. (Objective BN4).*
- xv. *Development of the Boherboy Neighbourhood shall accord with the Local Area Plan's Phasing Strategy and shall include for the provision of a primary school site of not less than one hectare. (Objective BN5).*
- xvi. *A 10 metre (min) biodiversity strip (measured from the top of the bank) shall be reserved along both sides of the designated sections of the Corbally Stream for flood management, landscape and biodiversity reasons. This biodiversity strip shall cater for a pedestrian/cycle path from the Boherboy Road to the public open space to the north-east (District Park) as part of Phase 1 of development of the Boherboy lands. (Objective BN5a).*
- xvii. *Development across the Boherboy Neighbourhood shall protect and incorporate its existing rolling topography and its existing hedgerows and streams especially the watercourse and hedgerow that demarcates the old townland boundary between Boherboy and Gibbons. (Objective BN6).*
- xviii. *Development proposals on the south-west corner of the Boherboy lands shall either avoid the lands above the 150 metre contour through the provision of an appropriately landscaped buffer (see Section 7.2.15) or demonstrate design integration with the landscape through measures that may include a combination of low density housing (i.e. bungalows or similar) and properly landscaped public open space that would be of benefit to the development of the site and lands as a whole. (Objective BN7a).*

Taking into account all of the foregoing, it is respectfully put forward that whilst the Fortunestown LAP, 2012 has expired and has not been replaced an updated LAP, the subject site at Boherboy is currently zoned objective "RES-N" which permits residential development. The current CDP and its Core Strategy, as well as its identification of the subject lands at Boherboy as being a "Housing Capacity Site", includes reference to RES-N lands as part of the zoned land resource allocated for housing development.

The design and layout of the proposed LRD has evolved in accordance with the various design parameters and objectives that were previously set out in the LAP and that the majority of lands that were subject to the Fortunestown LAP have been granted permission and developed which reflect the content of this LAP, with the subject site being the final "neighborhood" within that LAP to be developed / secure planning permission. It is also noted that the current County Development Plan incorporates specific roads objective across the subject site, and that these roads objective reflect that set out in the LAP.

The proposed LRD reflects the layout and design principles from the now expired LAP and in line with An Bord Pleanála's determination (under Ref. ABP-32141924 at Bohernabreena, Oldcourt and Killininny), it is put forward that granting the permission currently being sought on the Boherboy site *"is warranted and would not be inconsistent with the spirit and intent of the overall wording of zoning objective RES-N"*. This assertion is in keeping with the aforementioned LRD permission granted in April 2025 and the Planning Authority's decision to grant permission on another site previously subject to the Fortunestown LAP (Ref. LRD23A/0001) in April 2023, with both grants of permission issued after the expiry of the relevant LAPs and under the current CDP, 2022-2028.



In their LRD Opinion for the subject proposal, the Planning Authority has acknowledged that it “*is satisfied, that notwithstanding the fact that the Fortunestown LAP has now expired, that the current proposal, subject to it meeting each of the other relevant objectives of the CDP, meets the intent of an “approved area plan”*” for a variety of reasons as outlined above.

4.1.4 CDP Policies and Objectives

Policies and objectives supporting the existing CDP’s strategic vision are contained in the various chapters of the existing CDP. The chapters of the CDP considered most relevant to the proposed development are **Chapter 5** ‘Quality Design and Healthy Placemaking’ which promotes “*sustainable urban design and healthy placemaking that delivers attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest*”; **Chapter 6** ‘Housing’ which seeks to ensure the “*delivery of high quality and well-designed homes in sustainable communities to meet a diversity of housing needs within the County*”; and **Chapter 12** ‘Implementation and Monitoring’ which sets out the “*development standards and criteria that arise out of the policies and objectives of the County Development Plan, to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development*.”

The proposed development has been considered against the relevant policies and objectives of not just the aforementioned chapters but all of the chapters forming part of the CDP in order to ensure a coherent development which supports the strategic vision of the county. Full details of the proposed development’s compliance with same can be found in the accompanying “Statement of Consistency” prepared by Armstrong Fenton Associates which is submitted as a separate, standalone, document and, for the avoidance of repetition, we respectfully refer the reader to this document.

4.1.5.1 The Delivery of Sustainable Neighbourhoods - The Plan Approach’

It is noted that the existing CDP (Section 5.2.1) promotes the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialize and invest in throughout the County.

In accordance with **QDP2 Objective 1** of the existing CDP, which seeks: “*To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how ‘The Plan Approach’ has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design*”, this section of the Planning Statement provides details as to how ‘the Plan Approach’ eight key design principles have been incorporated into the design of the proposed development.



Fig. 9. Extract from Figure 1 of the CDP “Eight Design Principles”.

1. Context - Consider existing natural, cultural and built heritage features and green infrastructure elements as well as social, economic and environmental factors that impact on an area.

The subject site is a greenfield site, zoned for residential development, located adjacent to existing residential developments and open space, with the Dublin mountains to the south. As already detailed in this Planning Statement, the site is located within the Citywest / Fortunestown area of the County which is recognised in the CDP as a new district that is identified for residential growth and is a “MASP Residential Growth Area”. The subject site is the last significant land bank that was formally identified as the “Boherboy Neighbourhood” in the now expired Fortunestown LAP, with all of the other neighbourhoods in that LAP now committed in terms of housing delivery and extant permissions. The proposed development seeks to continue the delivery of new housing in the area and significantly contribute to the completion of housing development the Citywest / Fortunestown area.

The proposed development has been designed to be complementary to and cognisant of its receiving environs, providing a scheme which:

- (i) is visually and physically connected with existing residential estates to the north and east,
- (ii) has a variety of neighbourhood zones / character areas and housing typologies which respect the existing character of the area and provides for an appropriate level of variety and visual interest,
- (iv) has an ample provision of public open space including connections to the adjoining Carrigmore Park,
- (v) takes into account the sloping nature of the site and appropriately responds to same in terms of housing typology, building height and stepped arrangement of buildings as necessary,
- (vi) provides for appropriate building heights (in the majority two & three storeys) with taller buildings located in appropriate areas so as to lessen any visual impact,
- (vii) retains existing trees and hedgerows as much as feasibly possible and provides for supplementary planting to support loss,



- (viii) prioritises pedestrian and cyclist permeability and green infrastructure throughout, and
- (ix) provides for an efficient and viable level of density.

2. Healthy Placemaking – *Promote good urban design, which seeks to create public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate social interaction.*

The proposed development provides for a quantum of public and communal open space which meets the requirements of the existing CDP and the Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023).

The creation of active street frontages is achieved by designing a highly permeable layout which promotes passive surveillance and prioritises use by pedestrians and cyclists. The use of different treatments and typologies proposed within each character area creates distinctive areas within the scheme adding vibrancy and strong visual interest to the proposed scheme creating a sense of place for this new neighbourhood.

An ordered series of urban residential cells is proposed across the scheme connected by a hierarchy of streets and related open spaces. The new street network is legible and easy to navigate. It promotes permeability throughout the scheme itself and also provides easy connections to the neighbouring housing development areas, Carrigmore Park, the District Centre / Citywest Shopping Centre and Luas.

A series of secondary routes lead to quieter groupings of houses and homezones providing more pedestrian friendly streets. All housing cells are carefully considered and respond to their context and topography. The house facades overlook, supervise and define the edges of streets and public landscaped blocks.

The proposed development caters for an ample provision of public open space, while the proposed layout and the siting of buildings within the scheme has been carefully considered to ensure all public spaces are directly visible from dwellings thus providing passive supervision and an enhanced sense of safety. The proposed layout has also sought to retain existing trees and hedgerows as much as feasibly possible and provide for supplementary planting to support loss.

Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as the large Carrigmore Park to the north-east with new pedestrian / cyclist connections into same proposed as part of this application for permission. Pedestrian and cyclist accessibility has been prioritised throughout to afford users ease of access to all open spaces within the development and to neighbouring developments / lands.

The proposed layout allows for full integration of the proposed development with adjoining residential estates, with pedestrian and cyclist permeability / connections to these adjoining estates provided for thus creating a safe and accessible scheme for both future residents and visitors. The proposed road network has been subject to an independent road safety audit as part of this application for permission and is designed in compliance with DMURS principles to ensure safe movement for all users within the development.



3. Connected Neighbourhoods - *Promote public transport and other transport facilities that mitigate dependence on cars, promote safe walking and cycling, while assisting with internal movements within neighbourhoods.*

Regarding public transport, there are numerous bus operators providing a bus service locally and within walking distance to the site. Measured from the centre of the site, the nearest stop, located on the N82 Citywest Road, is located approximately 670m away, with the following bus services being available: route no.s 65, 65b, 69, 77a, W62 and S8. Measured from the centre of the site, the Luas Red Line (Saggart/Tallaght to Conolly/The Point) calls at the Fortunestown Luas Stop which is located approximately 950m north of the subject site. The Luas has a major terminus at the Square, Tallaght which is also a major terminus for Dublin Bus. The Square is served by Dublin Bus with several local routes.

Regarding pedestrian and cyclist infrastructure, segregated pedestrian and cyclist infrastructure is proposed throughout the development, with ancillary off-road routes and connections also provided throughout, ensuring pedestrians and cyclists are prioritised within the development.

The proposed development also caters for an appropriate level of secure and covered communal bicycle storage areas for the proposed apartment and duplex units, with houses accommodating bicycle parking within their curtilage. It is fully considered the proposed development promotes a transition to more sustainable transport modes as a priority.

4. Thriving Economy - *Ease of access to and availability of good jobs and a good quality of life for the community at large.*

The subject site is located within the lands identified as the new district of Citywest / Fortunestown with the Citywest Shopping Centre being c.1km walking distance north-east of the subject site. The site is proximately situated close to major employment centres to the north-east and east including Citywest Business Campus, Magna Park. Dublin city centre is located approximately 12km to the north-east of the site and easily accessible via Citywest Road (N82) connecting with the M7 (Naas Road) to the north, and Tallaght Town Centre (County Town) is located c.3.5-4km to the north-east of the site. Given the locational context of the site, including proximity to key roads infrastructure in the vicinity and access to public transport services (existing bus and Luas services), the proposed car parking provision, the ample provision of proposed bicycle parking as well as the provision of dedicated pedestrian and cyclist routes and infrastructure throughout the development, it is considered evident that future residents will have ease of access to, and availability of, good jobs, services and facilities and thus a good quality of life.

5. Inclusive and Accessible - *High quality services, community infrastructure and open spaces accessible to all.*

Were the subject site to be left undeveloped, it will remain an underutilised, zoned, and serviceable site that is inaccessible to the public. The proposed development provides for an efficient use of this zoned site, catering for residential development that will contribute to the receiving environs and supports the continued sustainability of nearby employment centres.

The proposed development caters for an ample provision of public open space, while the proposed layout and the siting of buildings within the scheme have been carefully considered to ensure all public spaces are directly visible from dwellings thus providing passive supervision and an enhanced sense of safety. The proposed layout has also sought to retain existing trees and hedgerows as much as feasibly possible and provides for supplementary planting to support loss. Overall, c.18% of the net development site area is provided as public open space, designed to a high quality and catering for varying forms of recreation.



Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest throughout the development. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as other existing public open space areas adjoining the site.

The proposed site layout plan allows for full integration of the proposed development with adjoining residential estates, with pedestrian and cyclist permeability / connections to these adjoining estates creating a safe and accessible scheme for both future residents and visitors.

Set out further on in this Planning Statement (section 7.15) are details of the applicant's proposals in relation to the provision of community facilities, which has been agreed in principle with the Planning Authority, prior to the submission of this LRD planning application – please refer to same.

6. Public Realm - *A real sense of place, positive purpose and local distinctiveness, where buildings are not only attractive but also safe and useful with lots of green and open spaces for people to spend time, relax and play.*

The proposed layout and design ensure a strong urban streetscape is catered for along the length of the main link street traversing the development, with proposed dwelling typologies also considering the sloping nature of the site to ensure visual amenity and a sense of place is promoted.

The design of the proposed buildings and housing typologies are complimentary to the existing adjoining developments at Carrigmore and Corbally as well as the semi-rural nature of the site and character of the wider receiving environs. The submitted Architectural Design Statement prepared MCORM & Davey+Smith Architects illustrates how the proposed buildings will present to street frontages and adjoining developments, seamlessly fitting into the sloping topography of the site and creating passive surveillance throughout the development.

Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest throughout the development. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as other permitted and existing public open space areas adjoining the site.

Animated and active frontages are promoted throughout the development via own door access units and the location / siting of proposed communal and public open space areas. The proposed layout caters for direct vehicular and pedestrian / cyclist permeability from Boherboy Road through the entire site, connecting to Corbally to the east and Carrigmore to north in line with the CDPs roads objectives, with off-road permeable pedestrian and cyclist routes also catered for to ensure pedestrians and cyclists are a priority.

The proposal to develop the subject site for residential use, in compliance with the land-use zoning objective attached to the site, will cater for increased occupancy and breathe new life into the area, with the proposed development designed to cater for five character areas of differing character and styles, thus creating well-defined areas within the overall development which will ensure the feeling of a sense of place for future residents.



7. Built Form and Mix – *Promotes a mix of uses with appropriate increases in density and building heights in the right locations maximising the existing transport network and existing infrastructure.*

The layout of the proposed dwellings / buildings has been considered in terms of the contextual location of the site and the immediate surrounding context. The proposed development is designed to cater for varying character areas within the overall site of differing characters and styles, thus creating distinct areas within the overall development which will ensure the feeling of a sense of place for future residents.

The proposed development provides for suitable building heights (in the majority two / three storey), with taller buildings located in the northern yet lower part of the site, which is deemed appropriate, all of which creates a level of visual interest and act as nodal points / minor recognisable landmarks within the development. The proposed building heights and typologies also take into consideration the topography of the site, in particular the sloping nature of the site, views of the Dublin mountains to the south, and the residential amenity of existing residential developments which abut the site. This has been carefully considered as part of the submitted Landscape and Visual Impact Assessment carried out by DNV which is enclosed as Chapter 11 of the submitted EIAR and accompanying photomontages.

The architectural composition of the development takes cognisance of the locational context of this site to develop housing which is both compatible with this outer suburban area and complies with the objectives of the CDP, whilst continuing with the design parameters previously set out in the now expired Fortunestown LAP. The proposed houses, apartments and duplex blocks are contemporary in style and layout; however, they complement the style and character of the wider Citywest / Fortunestown area. There is variation in material finishes and building form, but with variations in each of these parameters to ensure this development will have distinctive character areas within the proposed development.

8. Design and Materials - *High quality design, materials and finishes and good quality landscaping with robust maintenance protocols for all large residential, commercial and employment developments.*

MCORM and Davey+Smith Architects, along with Gannon & Associates Landscape Architects have prepared the submitted architectural and landscaping proposals which, based upon the principles of good urban design, are put forward for permission. The proposed houses / apartments and duplex blocks are traditional in their scale but contemporary in style and layout, which is respectful of the style and character of the wider Citywest / Fortunestown area. There is variation in material finishes and building form, but with variations in each of these parameters to ensure this development will have distinctive character areas within the proposed development.

The landscape proposals have been designed to complement the semi-rural setting of the site and neighbouring lands in terms of biodiversity and SUDs features and will create an amenable development that will successfully assimilate into its setting as it matures over time. Please refer to the submitted architectural design statement and landscaping design rationale documents prepared by MCORM and Davey+Smith Architects and Gannon & Associates Landscape Architects for further / full details.



5.0 Social & Affordable Housing - Part V Proposal

5.1 The residential element of the proposed LRD provides for 611 no. dwellings. To this end, on behalf of the Applicant's, we wish to state for clarity, that they both intend to fully comply with the requirements of SDCC's Housing Department in compliance with Part V, Section 96 (3)(b)(i) of the Planning and Development Act 2000 (as amended by the Affordable Housing Act 2021) within the development, should a condition in relation to Part V be attached to a forthcoming grant of permission.

5.2 Based on the date of purchase of the subject site and the requirements of Affordable Housing Act 2021, the Applicants acknowledge there is a requirement to put forward 20% of the total number of dwellings proposed as Social and Affordable housing, dependent on the date of purchase of the various land parcels that comprise the entire application site. Based on the date of purchase of the subject site and the requirements of Affordable Housing Act 2021, the Applicants acknowledge there is a requirement to put forward 20% of the total number of dwellings proposed as Social and Affordable Housing, dependent on the date of purchase of the various land parcels that comprise the entire application site. Evara Developments Ltd purchased the land in 2025, while Kelland Homes Ltd owns the land since 2006. Please note that where the 10 no. houses are proposed in the south-east corner, this piece of the application site was purchased in 2023.

5.3 We enclose MCORM drawing no. BHBY-MRM-AR-ZZ-DR-P4-XX-XX-0015 "Site Plan – Part V" which identifies the location of the units that are proposed to satisfy the Part V obligation associated with the proposed development. The Applicant's proposes to provide a total of 123 no. units as Social and Affordable Housing. This consists of the following breakdown:

- A.** Kelland Homes Ltd proposes 71 no. units, comprised of 5 no. houses, 40 no. duplex units and 26 no. apartments. Out of this, 42 no. units are proposed as Social Housing Units and 29 no. are proposed as Affordable Housing Units.
- B.** Evara Developments Ltd proposes 52 no. units, comprised of 4 no. houses and 48 no. duplex units. Out of this, 16 no. units are proposed as Social Housing Units and 36 no. are proposed as Affordable Housing Units.

5.4 Please refer to the submitted details and costs of the proposed 123 no. Part V units that has been prepared by the Applicants. The enclosed Part V proposal was submitted to the Housing Department of South Dublin County Council and a letter confirming the Applicants' engagement with the Housing Department of SDCC was received on 18th November 2025 confirming same – please also refer to same enclosed.

5.5 The submitted information is intended to provide a reasonable estimate of the costs and values of the proposed Part V units based on construction costs and values prevailing at the time of this application. The information set out is for the purposes of facilitating the planning application and will be subject to finalisation and formal agreement with the Local Authority. The ultimate agreement with regard to compliance with Section 96 of the Act is dependent upon receipt of a final grant of permission and on the site value at the time the permission is granted. The Applicants. intend to fully comply with the requirements of Part V of the Planning and Development Act 2000 (as amended) and the Housing Strategy of South Dublin County Council with respect to the provision of Social and Affordable Housing.



6.0. Site Location and Description

6.1. General Location

The site is located circa 4km south-west of Tallaght town centre, circa 1.3km east of Saggart, 700m south-west of Citywest Shopping Centre and circa 1.6km south of the N7. The site is a greenfield, outer suburban site, yet well connected to existing services, facilities and public transport services at Citywest to the north-east.

To the immediate north of the site is the Carrigmore residential estate, to the west are agricultural lands and a single dwelling, to the east is the Corbally / Verschoyle residential estate while to the south, the site has road frontage along the Boherboy Road.

The Kelland Homes lands have been zoned for residential land use since the adoption of 1998 South Dublin County Development Plan, with the adjoining Evara Developments Ltd lands, zoned for residential land use since the adoption of the 2004 South Dublin County Development Plan.

The south-east corner of the site abutting Corbally Glade has been purchased by the Applicants since the lodgement of the previous SHD application and has been an undeveloped parcel of land, almost left over since the development of the Corbally estate in the 1990s, and has also been zoned for residential land use for many years.

A public park adjoins the site to the north-east, which was previously described as a “District Park” in the Fortunestown LAP and is known as Carrigmore Park, while Citywest Shopping Centre is located beyond the park further to the northeast.

6.2. Site Characteristics

The site is a greenfield site, having only ever been used for agricultural purposes. The site is steeply sloping, from south to north, with site levels ranging from 155mOD in the south-west corner to 117.5mOD in the north-west corner, which is a level difference of c. 37 metres across the entire site.

The two fields which form the subject site are divided by a typical agricultural type hedgerow and ditch running in an north-south axis, with similar type hedges extending around the perimeter of both fields. The hedgerows have been planted on hedgerow banks. The subject site includes the aforementioned two fields, as well as an additional parcel of land in the south-east corner that abuts Corbally and is separated from the two main fields by the Corbally Stream.

The Corbally Stream runs along the entire length of the eastern boundary of the site, turning west at the north-eastern corner of the site and flows along the northern boundary westwards where two streams within the site, the Cooldown and the Coldwater, flow into the Corbally. The Corbally then merges into the Camac River c. 2.5km away. A 10m riparian metre buffer setback from the top of the stream bank along the Corbally stream is provided for along the entire length as part of the proposed development, which will be maintained during the construction and operational phase of the proposed development, with the exception of the four no. stream crossings. Likewise on the western boundary, a 10m buffer is also proposed along the entire length of the site. The riparian buffer of the Cooldown stream (i.e. the central watercourse in the site) will be reduced in width limited to areas outside of the flood zones.

There are various utilities traversing the site which includes water network pipes, and underground and over-ground electricity transmission lines.



6.3. Transport / Access

The site is situated on the Boherboy Road, a local road (L2008), circa 1.3km east of Saggart Village. The eastern site boundary is located 300 metres from the junction of the N81 Blessington Road and the L2008 Boherboy Road. There is a continuous white line in the centre of the road. A 60km/h speed restriction applies in this area. There are no footpaths or public lighting utilities along the Boherboy Road.

There are numerous bus operators providing a bus services locally and within walking distance to the site, notably the following bus services:

- No. 65B - Poolbeg Street – Citywest,
- No. 69 – Hawkins Street - Rathcoole
- No. 77A - Ringsend - Citywest,
- No. W62 – The Square – Newcastle and
- No. S8 - Kingswood Avenue to Dun Laoghaire Station.

The proposed development provides pedestrian and cyclist linkages to Corbally and Carrigmore Park to the east, with vehicular connections from the site into Corbally to the east and Carrigmore to the north, as per the roads objectives contained in the current South Dublin County Development Plan, 2022-2028. The Applicants have the control/consent to deliver these proposed accesses. A new, single, vehicular entrance off the Boherboy Road at the southern boundary is proposed, with footpaths / cycle paths etc. to be provided inside same so as to preserve/maintain the southern boundary as much as is possible. In total, there are 5 no. pedestrian/cyclist and vehicular access connections between the proposed development and Carrigmore, Carrigmore Park to the north and northeast and Corbally to the east, comprised of:

- 3 no. vehicular connections, (i) from Boherboy Road to the south, (ii) into Corbally Heath to the east & (iii) into Carrigmore Green to the north
- 2 no. pedestrian / cyclist connections into Carrigmore Park to the east / north-east via proposed bridge crossings.

The proposed 10 no. houses in the south-eastern part of the site will be accessed from Corbally Glade to the east. This will not provide vehicular access to the entire development as this portion of the site is separated by the Corbally Stream, however, pedestrian and cyclist access will be provided via a bridge crossing the Corbally stream.

Measured from the centre of the site, the Luas Red Line (Saggart/Tallaght to Conolly/The Point) calls at the Fortunestown Luas Stop which is located circa 950m north of the subject site. Full details of the permeability and connectivity to/from the site for pedestrian and cyclists is details in section 2.4 of the enclosed Traffic and Transport Assessment prepared by Pinnacle Consulting Engineers – please refer to same.



Fig. 10 – Pedestrian and Cyclist Permeability to Public Transport Services



7.0. Proposed Development

7.1. Introduction

Having thoroughly considered:

- (i) the planning history of the site,
- (ii) the pattern of existing residential development in the immediate vicinity,
- (iii) the site's locational context in relation to its location at the edge of the built up area and the Dublin mountains,
- (iv) the site's sloping topography,
- (v) the feedback received at both section 247 LRD "Stage 1" pre-planning consultation and Stage 2 "LRD" meeting as well as the information provided to us by the Planning Authority in their LRD Opinion Ref. LRDOP003/25,
- (vi) the policies and objectives of the existing South Dublin CDP, as well as current national and regional policy, guidance, and standards, including for section 28 Ministerial guidelines,

our clients, Kelland Homes Ltd and Evara Developments Ltd now submit this LRD planning application to develop the subject site at Boherboy.

7.2. Proposal

As outlined above, the submission of this LRD planning application follows on from (a) a S.247 pre-planning meetings with SDCC on 28th February 2025 (under Ref. LRDPP001/25), (b) the Stage 2 LRD pre-planning meeting with the Planning Authority, held on 20th May 2025 (under Ref. LRDOP003/25), and (c) receipt of the LRD Opinion on 17th June 2025, again under Ref. LRDOP003/25. This application for a Large-Scale Residential Development (LRD) is detailed in full below, as per the public notices:

Kelland Homes Ltd. and Evara Developments Ltd. wish to apply for permission for a Large-scale Residential Development (LRD) on a site located at Boherboy, Saggart, County Dublin. To the immediate north of the site is the Carrigmore residential estate, to the west are agricultural lands and a single dwelling, to the east is the Corbally residential estate and Carrigmore Park, while to the south is the Boherboy Road.

The proposed development consists of 611 no. dwellings, comprised of 306 no. 2, 3, 4 & 4-5 bed, 2 & 3 storey, detached, semi-detached & terraced houses, 133 no. 1, 2 & 3 bed duplex units in 12 no. 2-3 storey blocks, and 172 no. 1, 2 & 3 bed apartments in 5 no. buildings ranging in height from 4-5 & 5 storeys. The proposed development also includes a 2-storey crèche (c.630m²).

Access to the development will be via one no. new vehicular access point from the Boherboy Road, along with new vehicular connections to adjoining developments at Corbally Heath to the east and Carrigmore Green to the north. Ten no. houses in the south-east part of the site will be accessed from Corbally Glade to the east. The proposed development includes for pedestrian and cyclist connections throughout the proposed development and accesses into adjoining lands at Carrigmore Park, Corbally Heath and Corbally Glade to the east and Carrigmore Green to the north.

Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c. 2.3Ha of public open space, and c. 4,750sq.m of communal open space associated with proposed development.

The proposed development provides for (i) all associated site development works above and below ground, including surface water attenuation & an underground foul sewerage pumping station at the northern end of the site, (ii) public open spaces (c. 2.3Ha), (iii) communal open spaces (c. 4,750sq.m), (iv) hard & soft



landscaping and boundary treatments, (v) surface car parking (861 no. car parking spaces), (vi) bicycle parking (711 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) diversion of all existing overhead ESB lines underground, (ix) public lighting, and (x), plant / PV panels (M&E), utility services & 8 no. ESB sub-stations, all on an overall application site area of c.18.7Hha. In accordance with the South Dublin County Development Plan (2022-2028), an area of c.1.03Ha within the site is reserved as a future school site.

The development proposal is for a residential development consisting of 611 no. dwellings comprised of a mix of houses, duplex units and apartments, and a crèche, to be built on an overall application site area of c.18.7 Ha at Boherboy, Saggart, County Dublin by Kelland Homes Ltd and Evara Developments Ltd. The proposed residential development can be summarised as per Table 2 below, with further development statistics provided in Table 3 overleaf:

Unit Type	1 bed	2 bed / 3 person	2 bed / 4 person	3 bed	4 bed	4 / 5 bed	Total No.
Houses	0	0	30	243	26	7	306
Duplexes	11	0	46	76	0	0	133
Apartments	46	1	123	2	0	0	172
Total No.	57	1	199	321	26	7	611
% mix	9%	1%	32%	53%	4%	1%	100%

Table 2 – Summary of Proposed Residential Accommodation



Proposed Development:		
Dwelling Type	No. of Units	% Mix of Total
Apartments	172	28%
Duplexes	133	22%
Houses	306	50%
Total No. Units	611	100%
Unit Mix (Apartments)	No. of Units	% Mix of Type
1 Bed (2 persons)	46	27%
2 Bed (3 person)	1	1.00%
2 Bed (4 Person)	123	72%
3 Bed (5 person)	2	1.00%
Total No. Apartments	172	100%
Unit Mix (Duplexes)	No. of Units	% Mix of Type
1 bed (2 person)	11	8%
2 Bed (4 Person)	46	35%
3 Bed (5 person)	76	57%
Total Duplexes	133	100%
Unit Mix (Houses)	No. of Units	% Mix of Type
2 bed	30	9.8%
3 Bed	243	79.4%
4 bed	26	8.50%
4 bed / 5 bed	7	2.29%
Total Houses	306	100%
Unit Mix (Total)	No. of Units	% Mix of Total
1 bed	57	9
2 bed	200	33
3 bed	321	53
4 bed	26	4
4 bed / 5 bed	7	1
Total Units	611	100%
Development Statistics:		
Site Area (Gross)	18.7Ha	-
Site Area (Net)	12.2Ha	-
Net Density	50	-
Building Height	2, 3, 4-5 & 5 storeys	-
Gross Residential Floor Area (sq.m)	61,050.23sq.m.	-
Gross Creche Floor Area (sq.m)	630.1	-
Total Proposed Floor Area (sq.m)	61,680.33	-
Plot Ratio	Gross = 0.33	Net = 0.50
Site Coverage	Gross = 27%	Net = 54%
Aspect - Single (Apartments / Duplexes)	117 No.	38%
Aspect - Dual (Apartments / Duplexes)	173 No.	57%
Aspect – Triple (Apartments / Duplexes)	13	4%

Amenity Space		
Public Open Space	23,654sq.m (c.2.37Ha)	
P POS as % of Net Developable Area of the Site	19%	
Communal Open Space	4,750sq.m	
Community Infrastructure		
Creche (sq.m)	630.1sq.m	
Parking		No. of Spaces
Car Parking (Residential)	854	1.39
Car Parking (Non-Residential i.e. creche)	7	-
Total Car Parking	861	1.6
Bicycle Parking (Resi Long Stay – Apartments & Duplex)	544	1.78
Bicycle Parking (Non-Resi Long Stay i.e. creche)	5	-
Bicycle Parking (Resi Short Stay)	40	0.07
Bicycle Parking (Non-Resi Short Stay i.e. creche)	15	-
Bicycle Parking – Visitor / General Short Stay	107	-
Total Bicycle Parking	711	1.1

Table 3: Development Statistics

The proposed development consists of two adjoining sites to be developed by (a) Evara Developments Ltd. on the western side and (b) Kelland Homes Ltd. on the eastern side, as illustrated in Fig. 11 overleaf. This proposed LRD represents the development of the entire Boherboy Neighbourhood as identified within the now expired Fortunestown Local Area Plan (2012). While the proposed development takes the form of a single application for permission, it should be noted that the two landowners of the “Boherboy Neighbourhood” lands have come together as joint applicants for the proposed development and as a result, a coordinated and comprehensive development proposal is put forward for permission. It is considered this joint approach is the most appropriate approach for the co-ordinated development of the site and represents the proper planning and sustainable development of the Boherboy Neighbourhood.

It should also be noted that the Applicants are long established house builders, having delivered thousands of homes in South Dublin county and beyond, over many years, whilst also being active house builders currently delivering new homes in the count’s two Strategic Development Zones (SDZs) at Adamstown and Clonburris. Upon a grant of permission, it is their intention to carry out the proposed development and deliver much needed housing.



Fig. 11 – Site Location and Land Ownership

7.3 Layout Principles and Considerations

The subject site has very particular characteristics and a number of physical constraints that have influenced the design solution. The site has a number of physical constraints that were not only considered as part of previous design proposals but remain fixed and therefore, to a certain extent continue to influence a final design solution.

The overall site area is c.18.7Ha, however, taking into account the site's topography, the need to retain hedgerows and provide appropriate buffers, creation of riparian buffers, maintaining open watercourses, providing for natural surface water treatment solutions and catering for road/footpath improvements, as well as taking into account and wayleave provisions, the net developable area of the site is reduced by c.6.6Ha to c.12.2Ha, i.e. 35% of the total site area is undevelopable, thus leaving 65% of the gross site as capable of accommodating housing, on this site that is zoned for new residential development.



The key constraints / development parameters on the subject site are/include (and as illustrated in Fig. 12 overleaf):

- It is a steeply sloping site, with site levels ranging from 155mOD in the south-west corner to 117.5mOD in the north-west corner, a difference of c. 37 metres across its length. The topography therefore creates considerable topographical challenges for laying out an accessible and visually pleasing residential scheme. A number of significant services wayleaves also traverse the site. The site's natural features include hedgerows, streams and biodiversity, are all primary considerations.
- There are 2 existing water supply pipe wayleaves running through the site, as identified in yellow on the submitted plans.
- The site has been subject to a comprehensive programme of ecological surveys, carried out by Scott Cawley, project ecologists and the details of all of the surveys are included in the Biodiversity chapter (Chapter 5) of the enclosed EIAR – please refer to same. Scott Cawley has examined the watercourses/ditches on site and a 10m riparian metre buffer setback from the top of the stream bank along the Corbally stream (along the eastern boundary of the site) will be maintained during the construction and operational phase of the proposed development, with the exception of the four no. stream crossings, as discussed in the preplanning meeting with SDCC. A riparian buffer of 10m will also be maintained for the Coldwater stream along the western boundary of the site. The riparian buffer of the Cooldown stream (i.e. the central watercourse in the site) will be reduced in width limited to areas outside of the flood zones.
- A flood risk zone to the north of the site.
- Circa.1.03 hectare of the site is required to be reserved for the future provision of a primary school, as agreed in principle with the Department of Education.
- The incorporation of nature-based SuDS solutions, married with the proposed landscape design has informed the proposed housing layout plan.
- Ensuring legibility of pedestrian and cyclist routes and connectivity to public transport, services and facilities. Over the last number of years, various accessibility / connectivity options for the subject site have been proposed / discussed. To date, based upon the current Development Plan roads objectives and the Applicants' control to deliver the proposed roads connections to Corbally to the east and Carrigmore to the north, the subject proposal will now be able to provide these access points, as well as the proposed new vehicular access point into the scheme from the Boherboy Road. This is fundamentally different to what was proposed under Ref. ABP-304828-19 where third-party consents were required.
- The proposed access arrangements align with the CDP's Roads objectives for this site. It should also be noted in the previous SHD application (Ref. ABP-313145-22) whereby the same access arrangements were proposed, the An Bord Pleanála Inspector stated: *"I am satisfied that the proposed vehicular access points i.e., Boherboy Road, Carrigmore and Corbally Heath, would alleviate any impact on the Boherboy Road in particular to accommodate the scale of the proposed development and that the planning application has provided appropriate access to the subject site to cater for the proposed development"*. She also stated: *"The development of these lands is imperative on the vehicular and pedestrian accesses via the adjoining lands (i.e., Carrigmore and Corbally Estates), as the Boherboy Road does not have capacity to cater for a development of this scale and intensity. While I acknowledge that there will be a greater volume of traffic as a result of the development, I am satisfied that the proposed access arrangements are acceptable with respect to traffic and pedestrian safety"*.
- Ensuring a network of connected and useable public open spaces, play areas and communal open spaces.

- Ensuring that SUDs principles and solutions have both informed the proposed site layout plan and married with the landscaping proposals for the site. We refer the reader to the drainage and engineering proposals by Roger Mullarkey & Associates, Consulting Engineers, the proposed landscaping details by Gannon & Associates, Landscape Architects and the Site-Specific Flood Risk Assessment (SSFRA) prepared by Kilgallen and Partners Consulting Engineers.

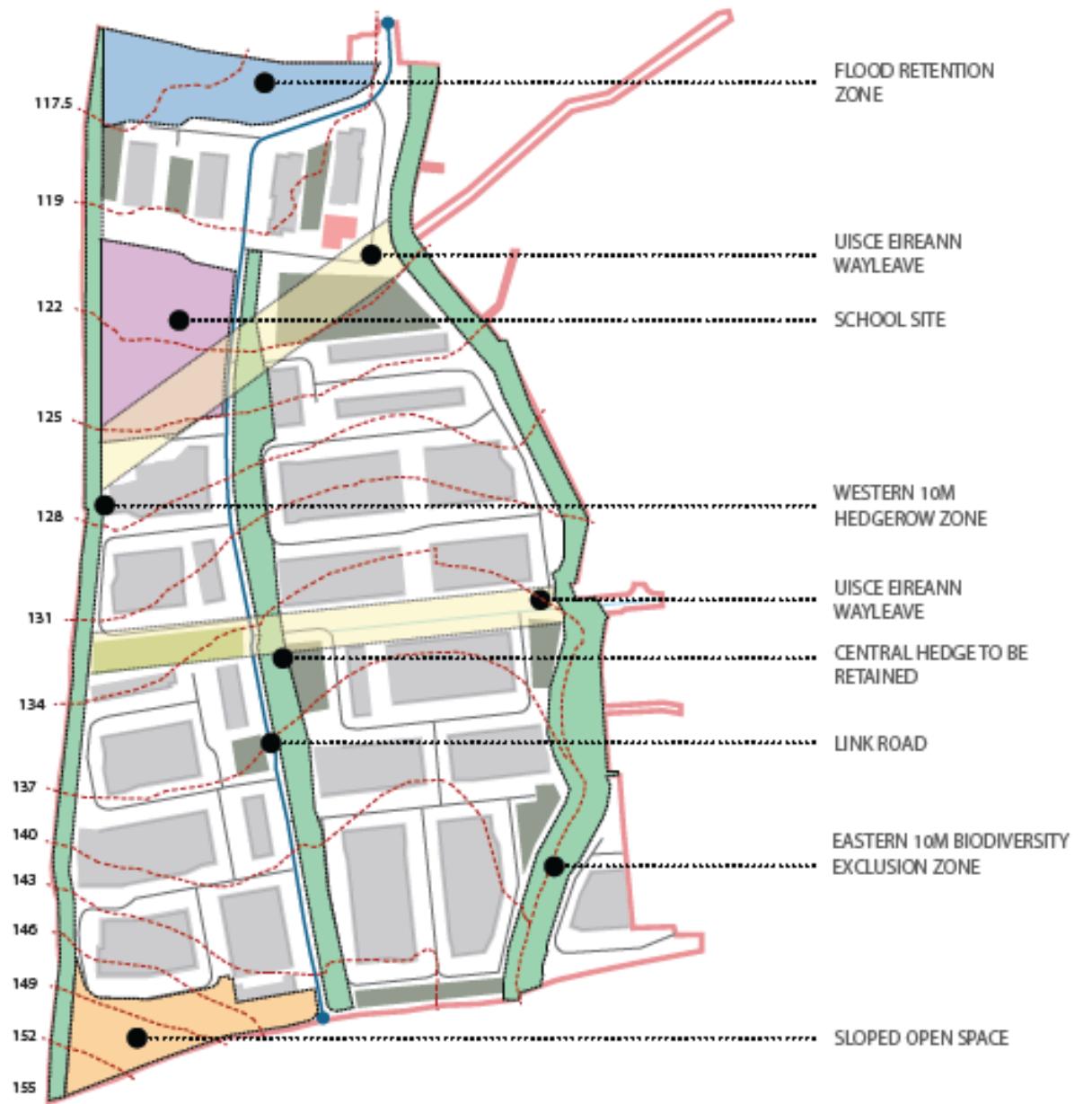


Fig. 12 – Site Constraints / Development Parameters

7.4 Green & Blue Infrastructure Integration with Landscaping & Biodiversity

- The proposed development seeks to integrate overland / nature-based surface water treatment solutions with landscaping. This approach has informed the architectural site layout plan, with previously proposed underground attenuation tanks omitted. The project integrates the natural heritage features on the site with streams and newly created wet areas. Areas like rain gardens and tree pits contribute to the ecological balance, and natural play zones offer interactive spaces for children.

- The landscape proposal incorporates natural SUDS strategies to manage stormwater across the site, using techniques like permeable surfaces and green spaces to integrate water management seamlessly into the environment. This approach not only addresses ecological concerns but also encourages community interaction by ensuring that these systems are part of the public realm.
- This project adopts an integrated approach to Sustainable Urban Drainage Systems (SUDS), incorporating measures such as permeable paving, bioretention raingardens, tree pits, green roofs, and attenuation areas. These strategies aim to manage surface water effectively while contributing to the quality of the urban environment. The attenuation areas have been designed as multifunctional spaces, making them usable and accessible for a range of purposes, including informal recreation. Natural features have been incorporated to allow for interaction and potential play opportunities, particularly during dry periods. Overall, the approach supports both functional drainage and broader environmental and social objectives within the public realm.
- Streets are designed as flexible, accessible spaces that promote community use, allowing residents to engage with their surroundings in a meaningful way. The design fosters both environmental sustainability and social interaction by blending functional water management with vibrant public spaces.
- The design introduces a “Bubbles SUDS” strategy, where circular forms inspire the spatial arrangement and visual identity of the development. This bubble motif is reflected in the layout of communal spaces, rain gardens, and bioretention areas, creating soft, organic shapes that mimic the natural dynamics of water. This circular design integrates SUDS solutions seamlessly into the landscape, fostering a playful yet functional community environment.

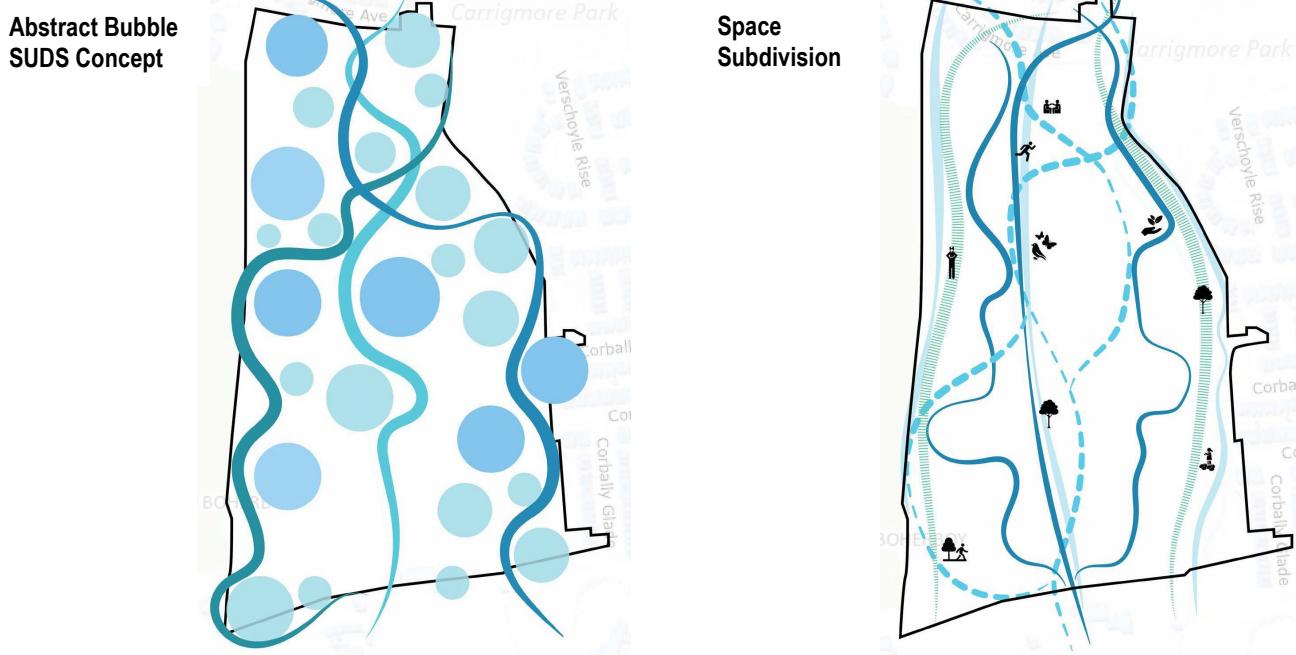






Fig. 14 - Proposed SUDS Strategy

- The “Playful Streets” strategy introduces visual “bubbles” through coloured paving and geometric shapes along the streets, fostering dynamic, inviting spaces for social interaction and play. These combined approaches promote both sustainability and community, blending functionality with natural aesthetics.
- The landscape character areas are divided into three main categories based on their function: Active Open

Space for recreation and community use, Ecological Riparian Corridors that protect and enhance the site's watercourses and biodiversity, and Streetscape, which includes shared and playful streets that support safer, more inclusive movement. This division helps to clearly define the role of each space within the overall layout – as per Fig. 15:



Fig. 15 – Landscape Character Areas



marsh habitat occurs in the northeastern part of the eastern field of the site. This habitat is indicated by the presence of standing water, and various species. This habitat grades into the wet grassland habitat at its margins. A drain had been dug on site and was recorded during the habitat surveys in July 2025 in the eastern area of this habitat as part of the maintenance for agricultural land on the site.

- A review of ortho-aerial photographs shows that it is not a long-established habitat, and there is no evidence that this habitat was present in the apparently well-maintained agricultural fields in 2015. It is believed that its presence arose owing to damage to land drains in the low-lying ground, and it is relatively small in extent. Nonetheless, this habitat is valued as being of local importance higher value, due to its limited extent in the broader landscape and its potential to develop into a more species rich habitat and supporting habitat to other species. The vegetation within this area of habitat grades into wet grassland, dominated by rushes, which is not uncommon of poorly managed agricultural sites.
- Scott Cawley asserts that in relation to the area of marsh habitat within the site, on site, “*it is not practical to retain the marsh habitat in its current location owing to changes in the ground levels to address site accessibility requirements. Therefore, it is instead proposed to translocate the habitat (comprising approximately 0.05 ha) to another location within the proposed development site. The proposed translocation approach is based on a review of case studies and is considered to be a pragmatic and feasible solution in light of design constraints, and has been developed through a multidisciplinary iterative design approach with input from the design team’s engineers, hydrogeologist, landscape design team and ecologists. The area identified for habitat translocation and creation is to provide a greater area (0.13 ha) to that being permanently lost to the proposed development. A replacement ratio greater than one-to-one is used in this instance because of the uncertainty inherent in habitat compensation and translocation. This is detailed in the accompanying Marsh Translocation Report (Gannon & Associates, 2025)*””. Prior to works commencing, a detailed Ecology Site Management Plan specific to the contract programme will be prepared by a suitably qualified ecologist with reference to the construction programme.
- The ecological importance of the identified marsh habitat is acknowledged as the submitted landscaping proposal includes the controlled and planned relocation of these habitats to a designated area within the site, ensuring that the essential ecological and hydrological characteristics are preserved. In addition, this LRD planning application is accompanied by a standalone “Marsh Translocation Report” which outlines the step-by-step process for translocation, including site selection criteria, soil and vegetation handling protocols, water management strategies, and post-relocation monitoring plans. The report also details anticipated challenges and mitigation responses to reduce potential risks to biodiversity. Through this collaborative, science-led approach, the proposed LRD aims to deliver an environmentally responsible outcome that balances progress with preservation.
- The area where the marsh is located is proposed to be raised by c.1.5 meters as a fundamental part of the proposed development. This is a necessity to provide for Part M access needs and overall servicing of the wider lands. For that reason, the marsh cannot remain in situ.
- The proposal includes the controlled and planned relocation of these habitats to a designated area within the site, ensuring that the ecological and hydrological characteristics are preserved. The new location was selected based on topographical and hydrological analyses, replicating the water retention conditions observed during the GI Investigation. This involves the creation of micro-habitats such as depressions and wet areas, supporting the natural development of wet grass species and maintaining the high water table. The relocated marsh area will be integrated as key elements of the landscape plan, promoting a design that enhances the habitat as both a visual and ecological asset. These areas will also function as green infrastructure, contributing to the sustainability of the development.
- The translocation of the marsh habitat, combined with a strategic expansion to nearly double its original area.

The receptor site will be 1,260m² and the donor site is 702m². This offers significant ecological net benefits. By increasing the spatial extent of the marsh, the project enhances the site's capacity to support a broader range of hydrophilic plant species, invertebrates, and wetland-dependent birds and amphibians.

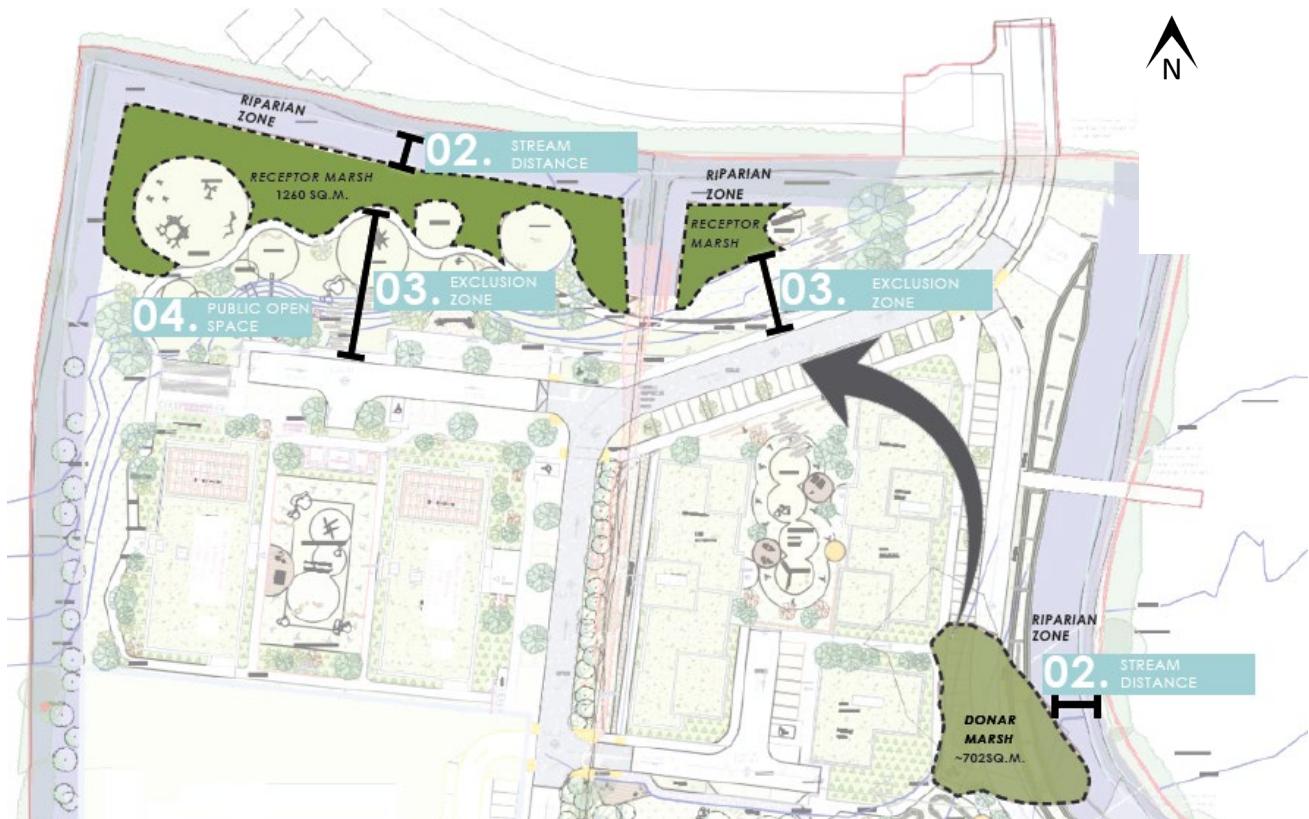


Fig. 17 – Proposed Marsh Translocation from existing eastern location northwards to proposed areas of open space

- The new location will be selected based on topographical and hydrological analyses, replicating the seepage and water retention conditions observed during the site visit. This will involve the creation of micro-habitats such as depressions and wet areas, supporting the natural development of wet grass species and maintaining the high water table. The relocated wet grass areas will be integrated as key elements of the landscape plan, promoting a design that enhances the habitat as both a visual and ecological asset. These areas will also function as green infrastructure, contributing to the sustainability of the development.
- Translocation to the receptor site will take place in early spring, at the end of dormancy, just before full growth. This is to give disturbed rooting system roots a chance to knit back into donor soil. Thereafter regrowth of the marsh species will occur from translocated turves. Translocation involves the removal of turves, soil and/or plant species from the impacted donor site to the new receptor site. Turves of habitat will be carefully removed from the chosen donor site using a suitable excavator (i.e. with adequate capacity to carefully remove the intact turve). The excavated turves will be temporarily stored in standing water. Some of the underlying soils will then be excavated and used to line the receptor site hollow. Due to the wetness of soils associated with the habitat, it is required that, they are translocated immediately from the donor site to the receptor site. We refer the reader to the enclosed "Marsh Translocation Report" for full details.

- In accordance with the Development Plan GI3 Objective 3: “To promote and protect riparian vegetation along all watercourses that a minimum 10m vegetated riparian buffer is maintained along all watercourses within any developed area. The appropriate buffers are provided for along the eastern, western and central field boundaries. A minimum 10m buffer / no development is provided for along the eastern and western boundaries.
- Section 5.1 of the enclosed Landscape Rationale prepared by Gannon & Associates Landscape Architects provides details on these ecological corridors and how they are maintained and landscaped – please refer



Fig. 18 – Riparian Buffer Zone Diagram



- As outlined above, SuDS proposals have been married into the landscaping proposals, both of which have had regard to the SSFRA carried out for the proposed development. The SuDS elements proposed are summarised as follows, however, we refer the reader to the submitted "Drainage and Water Infrastructure Engineering Report" prepared by Roger Mullankey and Associates, Consulting Engineers, and section 7 of same for full details of the surface water drainage proposals for the development. The appropriate SuDS features included in the proposed development include the following:
 - Green Roofs for the flat roof areas of the apartment blocks and the roof of the creche
 - Rain Garden planters to the rear down pipes of the houses
 - Permeable paving to all private parking areas for drainage of roads and front roofs of the houses
 - Filter Swales adjacent to roadways where feasible
 - Tree pits where practically feasible
 - Use of the existing centrally located Cooldown watercourse and hedgerow as a conveyance swale
 - Bio-Retention areas draining roads/paths and roofs
 - Silt-trap/catchpit manholes
 - Hydrobrakes limiting flow to the total Qbar greenfield rate
 - 9 no. open detention basins and 1 no. below ground retention storage system
- Roger Mullankey and Associates, Consulting Engineers note in their submitted report that in accordance with the OPW's The Planning System and Flood Risk Management- Guidelines for Local Authorities 2009 that Kilgallen & Partners Consulting Engineers have assessed and prepared a Site-Specific Flood Risk Assessment (SSFRA) which forms part of the planning application. The SSFRA concludes that an initial assessment of existing flood risk indicators indicate the site is not at risk from either Pluvial or Groundwater flooding, but could be at risk from Fluvial Flooding, and accordingly, a detailed assessment of fluvial flood risk was carried out. This detailed assessment confirmed that the site is affected by flood risk zones A & B at its northern boundary. The proposed development includes a basin at the northwest corner of the Site which is designed to provide direct compensatory storage. The inclusion of this basin means that while the proposed development will impact on existing flood risk zones at some locations and thus displace floodplain storage, it reduces the ground level at other locations, thereby providing compensatory storage. Cumulatively, more floodplain storage will be available upon completion of the proposed development than is currently available, leading to a slight reduction on flood risk elsewhere, in the areas immediately surrounding the Site. The submitted SSFRA concludes that:
 - i. the proposed development was subject to and passed the Development Management Justification Test,
 - ii. the proposed development is not at risk of flooding and will not increase flood risk elsewhere,
 - iii. the proposed development is therefore appropriate from a flood risk perspective.

7.5 Access Strategy

The subject site will be served by three no. newly created vehicular access points:

1. Boherboy Road (Access No. 1) at the southern boundary of the site,
2. via Corbally Estate at Corbally Heath to the east (Access No. 2) and
3. via Carrigmore Estate at Carrigmore Green Access No. 3) to the north.

The access arrangement from the Boherboy Road along the southern boundary of the site will maintain the existing boundary / hedgerow, save for the creation of the main vehicular access point in the centre. Footpaths will be internal to the site and not require the hedgerow to be removed. The previous Boherboy Road upgrade is no longer required, as agreed with the Planning Authority, via both of the LRD pre-planning stages outlined in the preceding section 2 of this Planning Statement, thus allowing for the retention and protection of trees along Boherboy Road and protection of the more rural character of Boherboy Road.



The proposed development provides for vehicular connections from the site into Corbally to the east and Carrigmore to the north, as per the six-year roads objectives contained in the current South Dublin County Development Plan, 2022-2028 (refer to Fig. 20 overleaf). The Applicants have the control/consent to deliver these proposed accesses, this principle of which was deemed acceptable by An Bord Pleanála in their recent assessment of the previous SHD for this site (Ref. ABP-313145-22), as outlined in section 6.2 above.

It is important to note that at the time the previous (first) SHD application for the subject site was submitted (Ref. ABP-304828-19), the proposed development was reliant on Boherboy Road for access as there were no means to provide an access via Corbally or Carrigmore – i.e. the consent for same was not available. However, the necessary consents are now in place as South Dublin County Council has taken in charge the lands at Carrigmore and Corbally to facilitate the proposed accesses. The subject LRD application will now be able to provide these access points, as well as the access via Boherboy Road. This is fundamentally different to what was proposed under Ref. ABP-304828-19 where third-party consents were required, however, similar to the most recent SHD (Ref. ABP-313145-22), the necessary consents are in place.

A fourth access will be provided via Corbally Glade (Access No. 4). This will not provide vehicular access to the entire development as this portion of the site is separated by the Corbally Stream and the necessary 10m setbacks from same on either side are adhered to as part of the design proposal. The south-eastern part of the application site, proposed to accommodate 10 no. dwellings will be accessed by the adjoining Corbally Glade access road to the east. However, this part of the proposed development will have pedestrian and cyclist access to the entire development via a bridge crossing the stream.

Two no. separate pedestrian / cyclist accesses are proposed into the adjoining Carrigmore Park to the east/north-east via proposed bridge crossings over the Corbally Stream.

Given the topography of the site and the sloping nature of same, and as requested in the subject LRD Opinion (Ref. LRDOP003/25), O’Herlihy Access Consultancy (OHAC) has prepared the submitted Site Universal Access Statement which confirms that they have been liaising with the design team during the planning stages of this project and are satisfied that the proposed site works will meet the requirements of Part M of the Second Schedule of the Building Regulations and consider a Universal Design Approach looking towards best practice as far as practicable. The enclosed Access Statement also confirms that *inter alia*:

- The various landscaped areas provided throughout the site are designed to meet the guidance in Section 1.1 of TGD M 2022 as far as practicable or exceed it where possible;
- All level access routes throughout the site are design to be no less than 1.5m wide with most areas achieving at least 2m in width;
- Due to the nature of the site, there is a large variation in height from one side of the site to the other. At least 1 No. designated route will be provided through the site that aligns with the requirements of Part M / TGD M 2022 in relation to level, sloped and ramped access to ensure that all users will be able to traverse and access as much of the development as possible;
- As far as practicable level routes have been provided across the site, however, there are a number of sloped areas which have been designed to be as shallow as possible. Gently sloped routes are provided to achieve a gradient of less than 1:20, while still achieving a large width;
- Where gently sloped routes cannot be achieved due to site specific conditions ramps have been provided with a max gradient of 1:12 over a short 2m distance. Where ramps are provided, they will be as shallow as possible and consideration for handrails will be incorporated into the design where it is practicable to do so.

We refer the reader to the enclosed Site Universal Access Statement for full details.



Fig. 19 – Proposed Vehicular Accesses



Fig. 20 – Extract from County Development Plan (Map 8) identifying 6-year roads objectives for accesses to the north into Carrigmore and east into Corbally, from the subject site.

The layout has been integrated with the established varied development patterns of the area and informed by the objectives set out in the County Development Plan, with reference also being made to the now expired Fortunestown LAP for structuring guidance. Factors such as connections, built form, density and green infrastructure have been key influences.

The development is structured along a north-south primary “Link Street” (a Development Plan 6-year roads objective) that connects the site with Carrigmore to the north. This link street which is main vehicular thoroughfare through the site also provides access to a permeable layout of traffic-calmed link streets and homezones, generating an overall permeable built environment that optimises sustainable movement, favouring pedestrian and cycling modes. Local streets (secondary level) connect to the adjoining estate at Corbally to the east. This access route is positioned west of the central hedgerow in order to protect and maintain same.

The creation of active street frontages is achieved by designing a highly permeable layout which promotes passive surveillance and prioritises use by pedestrians and cyclists. The use of different treatments and typologies proposed within each character area creates distinctive areas within the scheme, adding vibrancy and strong visual interest to the overall development thus creating a sense of place for this new neighbourhood.

An ordered series of urban residential cells is proposed across the scheme, connected by a hierarchy of streets and related open spaces. The new street network is legible and easy to navigate. It promotes permeability throughout the scheme itself and also provides easy connections to the neighbouring housing developments, Citywest Shopping Centre, Carrigmore Park and Luas.

A series of secondary routes lead to quieter groupings of houses and homezones providing more pedestrian friendly streets. The character of these streets varies, and traffic speeds are limited by design. All housing cells are carefully considered and respond to their context and topography. The house facades overlook, supervise and define the edges of streets and public landscaped blocks. Rear gardens back onto rear gardens of adjoining properties providing legible blocks.



Fig. 21 – Site's strategic connections and main internal routes.

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Fig. 22 – Proposed Street Hierarchy

All streets, including carriageways, footpaths and the proposed cycle track along the north-south Link Street, have been designed in accordance with DMURS, aiming to calm traffic within the development and enabling safe and comfortable movement of vulnerable users. In addition to the primary access road, secondary link streets and homezones configure the street layout of the development.

Local Streets

The primary local access avenue feeds the secondary residential streets connecting the Boherboy Road to the apartment/duplex blocks and dwellings. These streets typically have access to terraced or semi-detached houses. These streets provide for off street parking on curtilage and have 5m wide carriageway and segregated with a raised kerb a 2m wide footpath either side. Tree planting is proposed at the edge within the front garden boundary. Driveways are typically 5m long and have approx. 1.2m landscape buffer between the façade of the dwelling.



Fig. 23 – Sample of a proposed local street within the scheme

Homezones

These are smaller streets with a shared surface treatment, designed to favour the pedestrian and cyclist. Provision of these homezones maximises pedestrian and cycle permeability throughout the development. A narrow 4.8m wide carriageway with flush 1.2m wide pedestrian refuge zone to one side is intended to slow motorists and create quiet community streets. Tree planting is proposed to be located in the front gardens and refuge zone to locally narrow the road to help reduce speed on these roads.

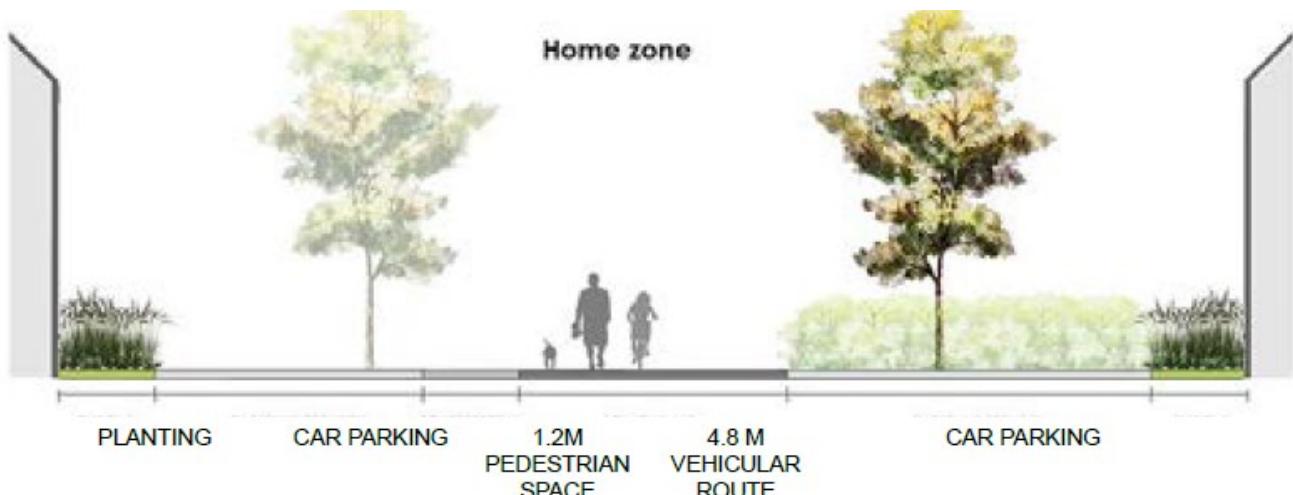


Fig. 24 – Sample of a proposed Homezone within the scheme



7.5 Character and Design

The integration of traditional and contemporary architectural elements aims to create a cohesive streetscape that respects and follows the existing development pattern of the adjoining estates to the east and north, while enhancing land-use efficiency and relationships with inner public open spaces and the wider Saggart / Citywest / Fortunestown community. Regard has also been had to the semi-rural nature of the subject site, despite its locational context as being an outer suburban site in Dublin, that has been zoned for new residential development since 1998. In addition, the overall site layout plan has evolved from the principles for the previously approved and statutorily adopted Fortunestown LAP which has since expired, including the roads objectives to provide connections to Corbally to the east and Carrigmore to the north, which have been incorporated into the County Development Plan as six-year roads objectives.

The creation of active street frontages is achieved by designing a highly permeable layout which promotes passive surveillance and prioritises use by pedestrians and cyclists. The use of different treatments and typologies proposed within each character area creates distinctive areas within the scheme adding vibrancy and strong visual interest to the proposed scheme creating a sense of place for this new neighbourhood.

An ordered series of urban residential cells is proposed across the scheme connected by a hierarchy of streets and related open spaces. The new street network is legible and easy to navigate. It promotes permeability throughout the scheme itself and also provides easy connections to the neighbouring housing development areas, Carrigmore Park, Citywest Shopping Centre and Luas.

A series of secondary routes lead to quieter groupings of houses and homezones providing more pedestrian friendly streets. The character of these streets varies, and traffic speeds are limited by design. All housing cells are carefully considered and respond to their context and topography. The house facades overlook, supervise and define the edges of streets and public landscaped blocks. Rear gardens back onto rear gardens of adjoining properties providing legible blocks.

The integration of traditional and contemporary architectural elements aims to create a cohesive streetscape that respects and follows the existing development pattern of the adjoining estates to the east and north while enhancing land-use efficiency and relationship with inner public open spaces and the wider Saggart / Citywest / Fortunestown community.

The traditional 2 and 3 storey houses provide a sense of continuity with the surrounding context, respecting the semi-rural nature of the site, while prominent blocks to the northern and southern edges present an urban edge when approaching from Boherboy Road to the south or from the north. Particularly, the northern precinct of the site features the highest density and scale owing to its closer proximity to the LUAS red line passenger stop, and design principles set out in the previous Fortunestown LAP.

Judicious consideration has been given to design the interface between buildings and the public realm to promote accessibility and usability while maximising passive surveillance and fronting of the same, as illustrated in Fig. 25 overleaf. Footpaths, seating areas, and landscaping aim to enhance the pedestrian experience and encourage interaction among residents and visitors. Furthermore, this LRD planning application is accompanied by an Accessibility Statement, which demonstrates that the proposed development is fully usable and accessible to all users.

The site is broken down into a number of distinctive character areas, as illustrated on Fig. 26, also overleaf. Each character area within the development has been carefully designed to possess a distinct identity, ensuring that it is visually different from neighbouring areas. This differentiation is achieved through several key design elements, including building typology, materials and finishes, the proportions and design of individual units, and the planning of open spaces. These factors work together to create a unique sense of place for each area, adding depth and variety to the overall site.



The proposed development is split by a north-south link avenue, dividing the site into two architectural zones, each of which will be designed by a separate architectural practice, further enhancing the distinctiveness of each zone. There are five character areas distributed across the site, with each one featuring its own design style, diverse unit types, and a combination of materials and finishes. This variety helps to establish a clear "sense of place" as residents and visitors move through the development. As people walk through the residential streets, they will experience changes in the architectural environment, from one area to the next, providing a dynamic and engaging experience.

The building heights throughout the site are carefully varied to create a harmonious relationship with the surrounding landscape and the overall site layout. Along the main north-south link road, the building heights begin with 3 storey typologies. These mid-rise buildings create a strong, defined urban edge along the street, helping to establish a sense of enclosure and giving the area a prominent architectural presence.

As one moves away from the link road, the building heights gradually decrease, transitioning to two-story semi-detached and terraced houses on the east and west sides of the site. These lower-density housing clusters are in keeping with the surrounding building typologies, ensuring a smooth transition from the higher-density core of the development to the more suburban and rural areas, particularly as the site gradually merges with agricultural and amenity lands to the west and south.

In the northern part of the site, 4-5 and 5 storey apartment blocks are introduced, providing a higher density of living spaces. These taller buildings are strategically placed in the lowest part of the site, where their scale is better suited to the topography, and as identified in the previous LAP. These apartment blocks act as a clear urban edge to the remainder of the Fortunestown LAP lands to the north, while their consistent architectural style and materials help maintain cohesion with the rest of the development. The design of these apartment blocks also incorporates features that enhance surveillance, allowing residents to overlook the western and eastern site boundaries, the potential future school site, and the northern public open space, fostering a sense of safety and community interaction.

A designated future school site, along with existing wayleaves, divides the northern and central sections of the site. This division creates a natural break in the development, while the central area of the site transitions from the taller 4-5 and 5 apartment blocks to the lower scale of 2 and 3 storey duplex blocks and houses. The design of the central portion ensures that the public open spaces and the central north-south link road are engaged with housing and duplex blocks. This design increases passive surveillance and activity in these spaces, creating a more vibrant and interactive environment while maintaining a strong building edge through the central section of the site.

The southern portion of the site features a blend of terraced houses, semi-detached houses, and duplex typologies, with building heights ranging from 2 to 3 storeys. The density and scale of the buildings increase as they move closer to the north-south link road, particularly in the northern precinct, which is closest to high-capacity transport services such as the LUAS Red Line. This increase in density near the transport corridor makes the southern section well-suited for higher-density development, offering residents easy access to public transport services while maintaining a well-structured and cohesive urban environment.

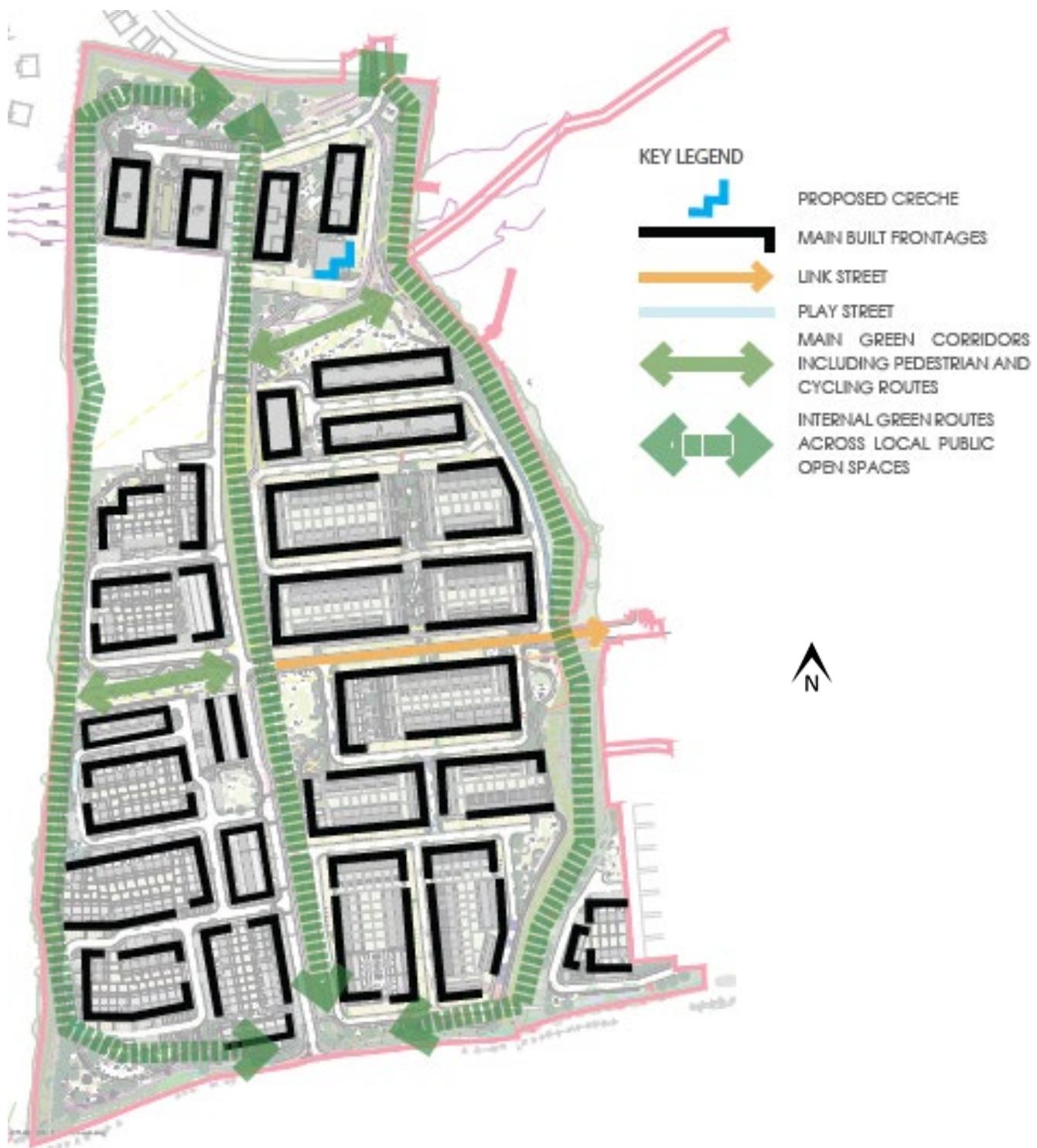


Fig. 25 – Diagram presenting the proposed street hierarchy of the scheme

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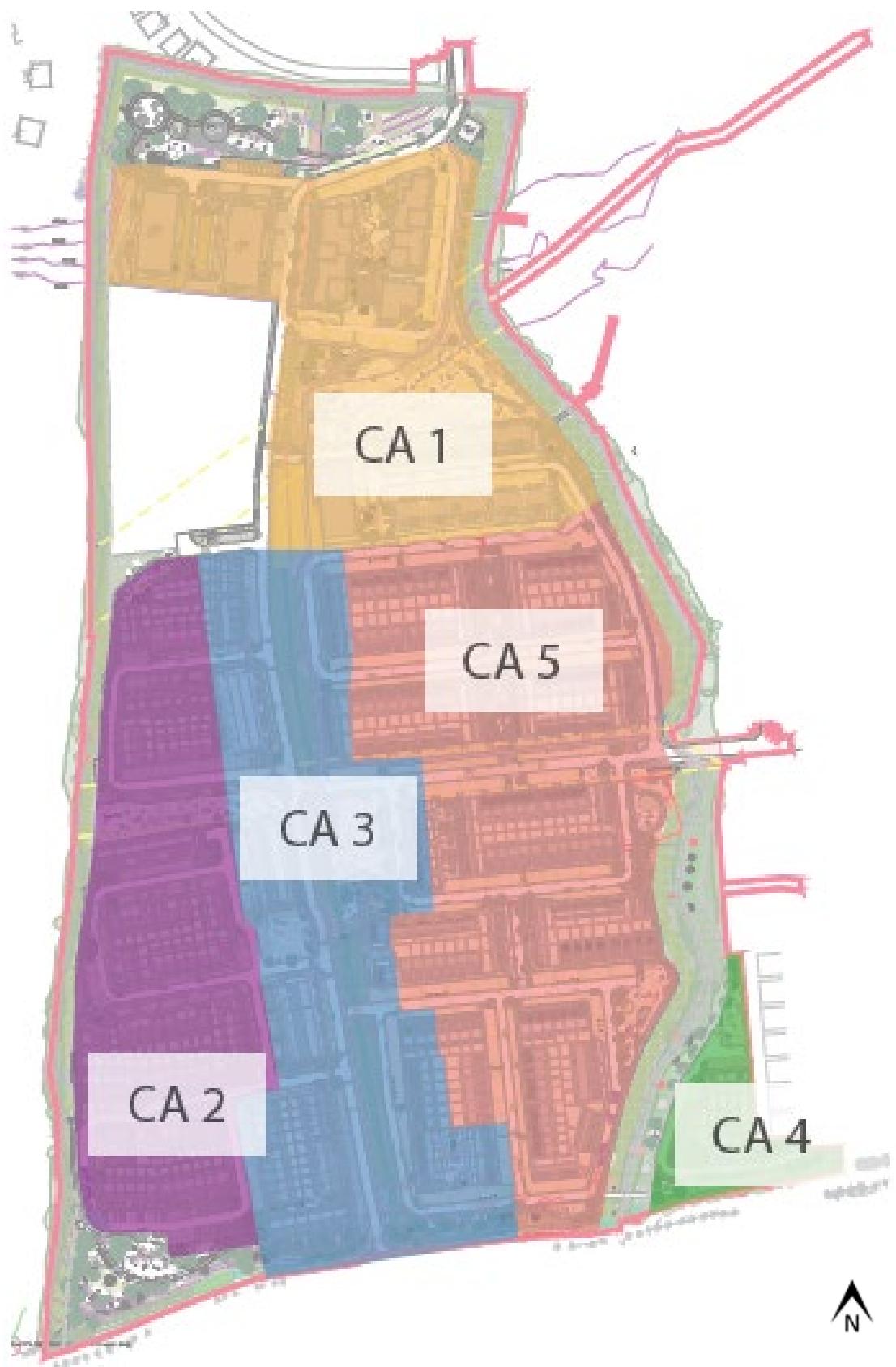


Fig. 26 – Site layout of proposed development indicating the location and extent of the proposed 5 no. character areas



Each of the five character areas have been designed to have their own identity and will be visually different to neighbouring character areas in a number of aspects. Building typology, materials and finishes, individual unit design and proportion and open space design are all used to develop an individual sense of place for each separate character area.

The individual character areas are further described in the Architectural Design Statement - please refer to same.

7.6 Density of Proposed Development

The proposed site layout plan effectively represents the masterplan for the entire Boherboy Neighbourhood and has been based upon (i) the guidance set out in the South Dublin County Development Plan, (ii) the planning history associated with the subject site and (iii) relevant S.28 Ministerial Guidelines.

The site is subject to several well-known physical constraints, including its sloping topography, the presence of Irish Water / Uisce Éireann wayleaves, hedgerows, and streams, with the current proposal also having to balance the need to cater for an aesthetically pleasing housing development that provides for an appropriate level of density and ensures its visual impact on the receiving environs is minimised.

The “southern half” of the proposed layout, being the highest part / elevation of the site provides for a mix of terraced, semi-detached, and detached houses, pepper-potted with low-rise duplex buildings at key locations to provide good urban street frontage, with higher rise / higher density apartments proposed at the northern end of the site, at the lowest point of the site, all of which caters for an appropriate level of variety and distinctiveness.

In accordance with the Sustainable Residential Development and Compact Settlement Guidelines, 2024, the proposed development is located within the Metropolitan Area of Dublin City, albeit it on the edge of the urban built up area and, as per Table 3.1 of same, the site is considered to be categorised as a “City – Suburban/Urban Extension” site, given its greenfield nature at the edge of the existing built-up area of South Dublin. In accordance with Table 3.1, densities in the range of 40 dph to 80 dph shall be shall generally be applied at suburban and urban extension locations in Dublin. We note that under the LRD Opinion received by the Planning Authority for this site/proposed LRD (Ref. LRDOP00325) the Planning Authority “agrees that the appropriate density range for this site is between 40 to 80 uph”.

The proposed development of 611 no. dwellings provides a net density of c.50 units per hectare across the entire site, and represents an efficient density for this zoned, serviced, site, having regard to the guidance set out in the Sustainable Residential Development and Compact Settlements Guidelines, 2024.

The proposed site layout plan takes into consideration:

- the existing wayleaves traversing the lands,
- the identified school site on the western side of the lands,
- topography,
- ecological / natural heritage features, and
- access arrangements.

In calculating the net density of the proposed development, guidance set out in Appendix B of the Sustainable Residential Development and Compact Settlement Guidelines, 2024 has been followed whereby the following factors are allowed to be discounted:

- Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.
- Lands used for commercial development (inc. retail, leisure and entertainment).
- Lands for primary schools, churches and other community services and facilities.

- *Larger, Regional or District Parks, Wayleaves or rights of way.*
- *Other areas of land that cannot be developed due to environmental sensitivities, topographical constraints (i.e. steepness) and/or are subject to flooding.*

The proposed density is also put forward with consideration to the guidance of the NPF, the Building Height Guidelines, the Apartment Guidelines, and the recently publicised “Delivering Homes, Building Communities” which is the Government’s new housing plan called which aims to speed up the delivery of new homes and tackle homelessness, and focuses on activating the supply of 300,000 homes between 2025 and 2030, all as affirmed in the enclosed Statement of Consistency.

Based upon the requirements of the Compact Settlements Guidelines and the planning history attached to the subject site, the subject site has a net developable area of c.12.2Ha, upon which it is proposed to develop 611 no. dwellings, thus equating to a net density of c.50 units per hectare across the entire site. In accordance with the Compact Settlement Guidelines, the area used for net residential density calculations, as highlighted in Fig. 27 overleaf, the following areas within the site have been discounted to calculate the resultant net density:

- Land reserved for a future school - c.1.03 Ha (10,311sq.m),
- Designated flood zone - c.0.69Ha (6,892sq.m),
- Two no. drainage wayleaves traversing the site - c.1.33Ha (13,312sq.m),
- South-western portion above the 120m contour line / steeply sloped part of the site - c.0.49 Ha (4,972sq.m)
- Hedgerow along the western boundary and its 10m buffer zone - c. 0.66Ha (6,581sq.m),
- 10m buffer from the top of the stream bank along the eastern boundary - c. 1.24Ha (12,440sq.m)
- Area occupied by central ditch - c.0.8Ha (8,044sq.m)
- The centrally located north-south "Link Street" c. 0.4Ha (4,024sq.m).
- Total = c.6.45Ha (64,455sq.m)
- Resultant net developable area = c.12.2Ha (122,247sq.m)

The above provides a total of c.6.45 hectares that is undevelopable and can therefore be discounted to calculate the net developable area / net density of development. The net developable area of the subject site is therefore c.12.2 hectares upon which it is proposed to develop 611 no. dwellings, thus producing a net density of 50 units per hectare across the entire site. This aligns with the Sustainable Development and Compact Settlement Guidelines, which recommend a range of 40–80 dwellings per hectare on the subject site.

We note that the “northern half” of the subject site is located within a 1km walking distance of the nearest Luas passenger stop “Fortunestown” to the north. In light of this and in accordance with Table 3.8 of the Sustainable Residential Development and Compact Settlement Guidelines, 2024, which describes sites that are located close to “High Capacity Public Transport Node or Interchange” and that “*highest densities should be applied at the node or interchange and decrease with distance*”, the highest density of development is positioned in the northern part of the site. This also coincides with the topography of the site being at its lowest point in this location.

The site is also located in an “Intermediate Location”, i.e. the “southern half” as it is currently c.670m walking distance from the nearest bus stop on the N82 Citywest Road to the east.

Taking into account the site’s status as a “City – Suburban/Urban Extension” and both a “High Capacity Public Transport Node or Interchange” an “Intermediate Location”, as per Tables 3.1 and 3.8 respectively of the Sustainable Residential Development and Compact Settlements Guidelines, 2024, the appropriate density to be applied to the development of the subject lands is in the range of 40 to 80 units per hectare net.

Fig. 27 overleaf demonstrates how the density has been appropriately distributed throughout the entire site.

A

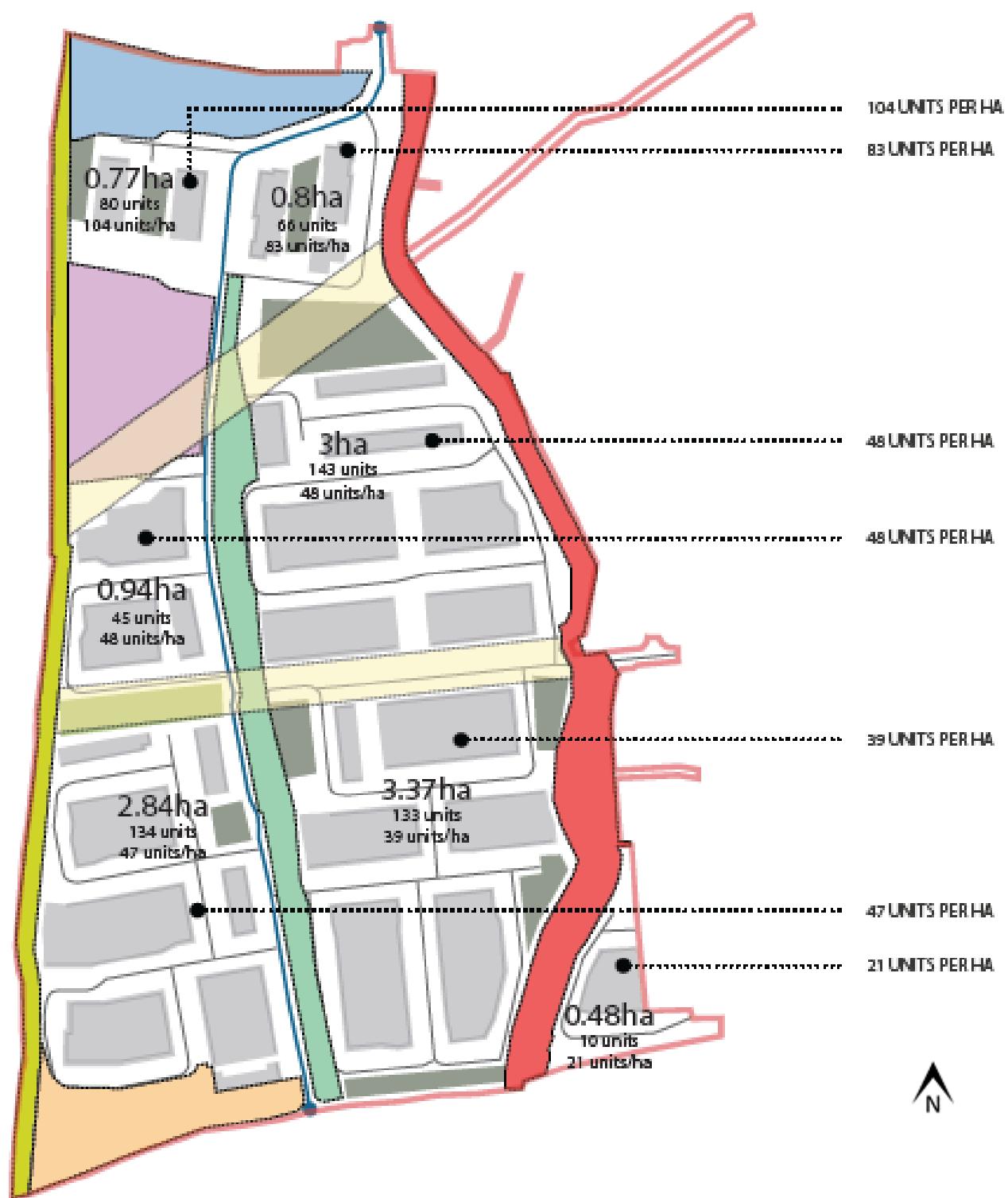


Fig. 27 – Distribution of Net Residential Density Throughout the Site



7.7 Housing Typology & Mix

7.7.1 Quantum of Units

The residential element of the proposed development consists of 611 no. dwellings; comprised of:

- 306 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached & terraced houses,
- 133 no. 1, 2 & 3 bed duplex units in 12 no. 2-3 storey blocks, and
- 172 no. 1, 2 & 3 bed apartments in 5 no. buildings ranging in height from 4-5 & 5 storeys.

Unit Type	Total Unit No.	% Mix
Houses	306	50%
Duplex	133	22%
Apartments	172	28%
Total	611	100%

Table 4 – Summary of Proposed Dwelling Types

7.7.2 Dwelling Mix

A simplified summary of the proposed dwelling mix is set out in Table 5 below:

Unit Type	1 bed	2 bed / 3 person	2 bed / 4 person	3 bed	4 bed	4 / 5 bed	Total No.	% Mix
Houses	0	0	30	243	26	7	306	50%
Duplexes	11	0	46	76	0	0	133	22%
Apartments	46	1	123	2	0	0	172	28%
Total No.	57	1	199	321	26	7	611	100%
% Mix	9%	1%	32%	53%	4%	1%	100%	-

Table 5 - Summary of Proposed Schedule of Residential Accommodation

The proposed development provides an even dwelling split of c.50% houses and 50% apartment and duplex units.

Fig. 28 below illustrates the distribution of the housing typologies throughout the site.



Fig. 28 – Housing Mix

The proposed residential mix is put forward for permission having regard to the following factors:

- the need to address the sloping topography of the site,
- the site's relationship to adjoining lands, which are comprised of existing residential development and situated at the foothills of the Dublin mountains,
- the various requirements to provide for an appropriate level of dwelling typologies which cater for a variety of consumer needs / lifestyle choices.

The proposed housing mix also reflects the need to provide an efficient density of at least 40 units per hectare, as required by the Sustainable Residential Development and Compact Settlements Guidelines, 2024, with the proposed LRD achieving a net density of 50 units per hectare across the entire site.

It is considered that ample provision has been made for housing typologies which can cater for residents who are at different stages of their lifecycle i.e. those who may be looking to downsize or young workers and couples as first-time buyers. Furthermore, consideration has also been paid to the requirement of **H1 Objective 12** of the existing South Dublin CDP which states: "*Proposals for residential development shall provide a minimum of 30% 3-bedroom units.....*".

As detailed in Tables 4 and 5 above, the proposed development complies with the above objective by providing 321 no. 3 bedroom units which equates to c.53% of the overall development proposal.

Section 12.6.1 'Mix of Dwelling Types' of the existing CDP also states: "*The overall mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. SPPR 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) states that residential development 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".*

As detailed in Tables 5 and 6 above, the proposed development includes 57 no. 1 bedroom units which equates to 9% of the overall unit provision thus complying with this requirement.

Policy QDP10 Objective 1 of the existing CDP also seeks to: "*Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.*"

Regarding the above, it is considered evident from the tables set out in this section of the Planning Statement that the proposed development provides for a wide variety of housing typologies, and a wide variety of unit sizes, with all proposed units being afforded an ample gross floor area which exceeds the minimum requirements, allowing for ease of internal adaption for future residents and, in the case of houses, the option to extend the dwelling, (particularly in the attic space) if required. This is affirmed by the submitted plans and is reaffirmed by the enclosed Housing Quality Assessment (hereafter "HQA") that is submitted as a separate document and we refer the reader to same.

The development will also provide for the required number of Social and Affordable housing units as detailed in the section 5 of this Planning Statement, (123 no. units total) thus ensuring a wide of variety tenures within the development. Please also refer to the enclosed Part V proposal detailing unit types and associated costs put forward for consideration.

In summary, the proposed residential mix is considered to support South Dublin County Council's Housing Strategy for new development which, in general, seeks to provide for an appropriate mix of dwelling types and sizes, that are capable of adaption as resident needs change over the course of their lifecycle, and tenures to facilitate the creation of balanced communities. As detailed in the submitted "Architectural Design Statement" prepared by the project architects, the proposed development has been designed to cater for five distinct character areas to ensure an appropriate level of variety and a sense of place is catered for throughout - please refer to same for further details. Furthermore, the submitted



HQA demonstrates that all of the proposed dwellings meet or exceed the minimum standards for housing and apartments as required by the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023) and the Quality Housing for Sustainable Communities – Best Practice Guidelines, 2007.

Proposed Development:		
Dwelling Type	No. of Units	% Mix
Apartments	172	28%
Duplexes	133	22%
Houses	306	50%
Total No. Units	611	100%
Unit Mix (Apartments)	No. of Units	% Mix
1 Bed (2 persons)	46	27%
2 Bed (3 person)	1	1.00%
2 Bed (4 Person)	123	72%
3 Bed (5 person)	2	1.00%
Total No. Apartments	172	100%
Unit Mix (Duplexes)	No. of Units	% Mix
1 bed (2 person)	11	8%
2 Bed (4 Person)	46	35%
3 Bed (5 person)	76	57%
Total Duplexes	133	100%
Unit Mix (Houses)	No. of Units	% Mix
2 bed	30	9.8%
3 Bed	243	79.4%
4 bed	26	8.5%
4 bed / 5 bed	7	2.29%
Total Houses	306	100%
Unit Mix (Total)	No. of Units	% Mix
1 bed	57	10
2 bed	194	32
3 bed	327	53
4 bed	26	4
4 bed / 5 bed	7	1
Total Units	611	100%

Table 6 – Proposed Dwelling Mix



HOUSES:

House Type	Description	No. of Units	Storeys	Floor Area (m ²)	Total Floor Area (m ²)
EVARA					
A	2 bed mid terrace	6	2	88	528
A1	3 bed terrace	11	2	88	968
Ba	3 bed mid terrace	31	2	107	3,317
Bb/Bc	3 bed end terrace	32	2	107	3424
Ca/Cb	3 bed terrace	15	2	97	1,455
Cc	3 bed terrace	3	2	98.4	295.2
D	4 bed semi-detached	1	2	134.3	134.3
E	3 bed semi-detached	1	2	111.8	111.8
F	4 bed end terrace	2	3	149.5	299
Ga / Gb / Gd	4 bed mid terrace / semi-detached	20	3	148.7	2,974
Gd	4 bed semi-detached	3	3	155.70	467.1
H	3 bed mid terrace	2	3	146.1	292.2
W1	3 bed terrace	2	2	102.8	205.6
Total Evara		129			14,471.2
KELLAND					
A1	4 - 5 bed mid terrace	3	3	148	444
A1-C	4 - 5 bed semi-detached	4	3	148	592
B1	3 bed mid terrace	41	2	118	4,838
B1-C	3 bed semi-detached corner	6	2	118	708
B1-E	3 bed semi-detached corner	22	2	118	2,596
C1	3 bed terrace	7	2 / split level	120.1	840.7
C1-E	3 bed end terrace	6	2 / split level	120.1	720.6
D1	3 bed terrace	19	2 / split level	120	2280
D1-C	3 bed corner	1	2 / split level	120	120.00
D1-E	3 bed end terrace	9	2 / split level	120	1,080
E1	3 bed mid terrace wide	5	2	116.8	584
E1-C	3 bed semi-detached corner wide	20	2	116.8	2,336
E1-D	3 bed detached	1	2	116.8	116.80
E1-E	3 bed semi-detached wide	9	2	116.8	1,051.2
F1	2 bed mid terrace wide	15	2	89.8	1347
F1-E	2 bed semi-detached wide	3	2	89.8	269.4
G1	2 bed mid terrace wide	6	2	92	552
Total Kelland		177			20,475.7
Total		306			34,946.9 m²

House Type	No. of Units
2 bed	30
3 bed	243
4 bed	26
4 / 5 bed	7
Total No.	306

Table 7 – Proposed Houses



DUPLEXES:

EVARA – WESTERN SIDE:

Unit No.	Type	Description	Floor Area (m ²)	Floor
Duplex Block A				
1	2A	2 bed / 4 person	81	Ground
2	1A	1 bed / 2 person	50	Ground
3	1A	1 bed / 2 person	50	Ground
4	1A	1 bed / 2 person	50	Ground
5	1A	1 bed / 2 person	50	Ground
6	2A	2 bed / 4 person	81	Ground
7	3A	3 bed / 5 person	124	1st & 2nd
8	3B	3 bed / 5 person	116	1st & 2nd
9	3B	3 bed / 5 person	116	1st & 2nd
10	3B	3 bed / 5 person	116	1st & 2nd
11	3B	3 bed / 5 person	116	1st & 2nd
12	3A	3 bed / 5 person	124	1st & 2nd
Total 12 No.			1,074 m²	

Unit No.	Type	Description	Floor Area (m ²)	Floor
Duplex Block B.1				
1	B1	2 bed / 4 person	83.7	Ground
2	B2	2 bed / 4 person	86.1	Ground
3	B2	2 bed / 4 person	86.1	Ground
4	B2	2 bed / 4 person	86.1	Ground
5	B2	2 bed / 4 person	86.1	Ground
6	B3	2 bed / 4 person	86.1	Ground
7	B4	3 bed / 5 person	122.2	1st & 2nd
8	B5	3 bed / 5 person	122.2	1st & 2nd
9	B5	3 bed / 5 person	122.2	1st & 2nd
10	B5	3 bed / 5 person	122.2	1st & 2nd
11	B5	3 bed / 5 person	122.2	1st & 2nd
12	B6	3 bed / 5 person	122.2	1st & 2nd
Total 12 No.			1,247.4 m²	



Unit No.	Type	Description	Floor Area (m ²)	Floor
Duplex Block B.2				
1	B1	2 bed / 4 person	83.7	Ground
2	B2	2 bed / 4 person	86.1	Ground
3	B2	2 bed / 4 person	86.1	Ground
4	B2	2 bed / 4 person	86.1	Ground
5	B2	2 bed / 4 person	86.1	Ground
6	B3	2 bed / 4 person	86.1	Ground
7	B4	3 bed / 5 person	122.2	1st & 2nd
8	B5	3 bed / 5 person	122.2	1st & 2nd
9	B5	3 bed / 5 person	122.2	1st & 2nd
10	B5	3 bed / 5 person	122.2	1st & 2nd
11	B5	3 bed / 5 person	122.2	1st & 2nd
12	B6	3 bed / 5 person	122.2	1st & 2nd
Total 12 No.			1,247.4 m²	

Unit No.	Type	Description	Floor Area (m ²)	Floor
Duplex Block B.3				
1	B1	2 bed / 4 person	83.7	Ground
2	B2	2 bed / 4 person	86.1	Ground
3	B2	2 bed / 4 person	86.1	Ground
4	B2	2 bed / 4 person	86.1	Ground
5	B2	2 bed / 4 person	86.1	Ground
6	B3	2 bed / 4 person	86.1	Ground
7	B4	3 bed / 5 person	122.2	1st & 2nd
8	B5	3 bed / 5 person	122.2	1st & 2nd
9	B5	3 bed / 5 person	122.2	1st & 2nd
10	B5	3 bed / 5 person	122.2	1st & 2nd
11	B5	3 bed / 5 person	122.2	1st & 2nd
12	B6	3 bed / 5 person	122.2	1st & 2nd
Total 12 No.			1,247.4 m²	



Unit No.	Type	Description	Floor Area (m ²)	Floor
Duplex Block D				
1	D1	1 bed / 2 person	53.9	Ground
2	D2	1 bed / 2 person	53.8	Ground
3	D2	1 bed / 2 person	53.8	Ground
4	D2	1 bed / 2 person	53.8	Ground
5	D2	1 bed / 2 person	53.8	Ground
6	D3	1 bed / 2 person	53.9	Ground
7	D4	3 bed / 5 person	119	1st & 2nd
8	D5	3 bed / 5 person	118.7	1st & 2nd
9	D5	3 bed / 5 person	118.7	1st & 2nd
10	D5	3 bed / 5 person	118.7	1st & 2nd
11	D5	3 bed / 5 person	118.7	1st & 2nd
12	D4	3 bed / 5 person	119	1st & 2nd
Total 12 No.			1,035.8 m²	

KELLAND – EASTERN SIDE:

Unit No. / Type	Description	Floor Area (m ²)	Floor
Duplex Block D1			
D01	2 bed / 4 person	76.1	Ground
D02	2 bed / 4 person	76.1	Ground
D03	2 bed / 4 person	76.1	Ground
D04	1 bed / 2 person	50.6	Ground
D05	2 bed / 4 person	97.2	Ground & 1st
D06	2 bed / 4 person	78.5	Ground
D07	2 bed / 4 person	76.1	Ground
D08	2 bed / 4 person	76.1	Ground
D09	2 bed / 4 person	76.1	Ground
D10	3 bed / 5 person	121.6	1st & 2nd
D11	3 bed / 5 person	121.6	1st & 2nd
D12	3 bed / 5 person	121.6	1st & 2nd
D13	3 bed / 5 person	121.6	1st & 2nd
D14	3 bed / 5 person	121.6	1st & 2nd
D15	3 bed / 5 person	121.6	1st & 2nd
D16	3 bed / 5 person	121.6	1st & 2nd
D17	3 bed / 5 person	121.6	1st & 2nd
Total 17 No.		1,810.9m²	



Unit No. / Type	Description	Floor Area (m ²)	Floor
Duplex Block E1			
E01	2 bed / 4 person	80.1	Ground
E02	2 bed / 4 person	80.2	Ground
E03	3 bed / 5 person	124.3	1st & 2nd
E04	3 bed / 5 person	124.3	1st & 2nd
Total 4 No.		408.9 m²	

Unit No. / Type	Description	Floor Area (m ²)	Floor
Duplex Block F1			
F01	2 bed / 4 person	78.5	Ground
F02	2 bed / 4 person	75.5	Ground
F03	2 bed / 4 person	75.5	Ground
F04	2 bed / 4 person	75.5	Ground
F05	2 bed / 4 person	75.5	Ground
F06	2 bed / 4 person	78.5	Ground
F07	3 bed / 5 person	121.6	1st & 2nd
F08	3 bed / 5 person	121.6	1st & 2nd
F09	3 bed / 5 person	121.6	1st & 2nd
F10	3 bed / 5 person	121.6	1st & 2nd
F11	3 bed / 5 person	121.6	1st & 2nd
F12	3 bed / 5 person	121.6	1st & 2nd
Total 12 No.		1,188.6 m²	



Unit No. / Type	Description	Floor Area (m ²)	Floor
Duplex Block G1	(end blocks x 2)		
G01 - A1	3 bed / 5 person	112.12	Lower Ground & Ground
G02 - A2	3 bed / 5 person	112.12	Lower Ground & Ground
G03 - A1	3 bed / 5 person	112.12	Lower Ground & Ground
G04 - A2	3 bed / 5 person	112.12	Lower Ground & Ground
G05 - B1	3 bed / 5 person	121.28	1st & 2nd
G06 - B2	3 bed / 5 person	121.28	1st & 2nd
G07 -B1	3 bed / 5 person	121.28	1st & 2nd
G08 - B2	3 bed / 5 person	121.28	1st & 2nd
G01 - A1	3 bed / 5 person	112.12	Lower Ground & Ground
G02 - A2	3 bed / 5 person	112.12	Lower Ground & Ground
G03 - A1	3 bed / 5 person	112.12	Lower Ground & Ground
G04 - A2	3 bed / 5 person	112.12	Lower Ground & Ground
G05 - B1	3 bed / 5 person	121.28	1st & 2nd
G06 - B2	3 bed / 5 person	121.28	1st & 2nd
G07 -B1	3 bed / 5 person	121.28	1st & 2nd
G08 - B2	3 bed / 5 person	121.28	1st & 2nd
Total 16 No.	1,867.2m²		

Unit No. / Type	Description	Floor Area (m ²)	Floor
Duplex Block G2	(mid block)		
A1	3 bed / 5 person	112.12	Lower Ground & Ground
A2	3 bed / 5 person	112.12	Lower Ground & Ground
B1	3 bed / 5 person	121.28	1st & 2nd
B2	3 bed / 5 person	121.28	1st & 2nd
Total 4 No.	466.8m²		
Total G1 + G2 = 20 no.	2,334m²		

Unit No. / Type	Description	Floor Area (m ²)	Floor
Duplex Block H1			
H01 / A1	2 bed / 4 person	76.42	Ground
H02 / A2	2 bed / 4 person	76.39	Ground
H03 / A1	2 bed / 4 person	76.42	Ground
H04 / A2	2 bed / 4 person	76.39	Ground
H05 / A1	2 bed / 4 person	76.42	Ground
H06 / A2	2 bed / 4 person	76.39	Ground
H07 / A1	2 bed / 4 person	76.42	Ground
H08 / A2	2 bed / 4 person	76.39	Ground
H09 / A1	2 bed / 4 person	76.42	Ground
H10 / A2	2 bed / 4 person	76.39	Ground
H11 / B1	3 bed / 5 person	121.07	1st & 2nd
H12 / B2	3 bed / 5 person	121.07	1st & 2nd
H13 / B1	3 bed / 5 person	121.07	1st & 2nd
H14 / B2	3 bed / 5 person	121.07	1st & 2nd
H15 / B1	3 bed / 5 person	121.07	1st & 2nd
H16 / B2	3 bed / 5 person	121.07	1st & 2nd
H17 / B1	3 bed / 5 person	121.07	1st & 2nd
H18 / B2	3 bed / 5 person	121.07	1st & 2nd
H19 / B1	3 bed / 5 person	121.07	1st & 2nd
H20 / B2	3 bed / 5 person	121.07	1st & 2nd
Total 20 No.		1,974.75m²	

Unit Mix	Block A	Block B.1	Block B.2	Block B.3	Block D	Block D1	Block E1	Block F1	Block G1	Block G2	Block H1	Total No.
1 Bed / 2 Person	4	0	0	0	6	1	0	0	0	0	0	11
2 Bed / 4 Person	2	6	6	6	0	8	2	6	0	0	10	46
3 Bed / 5 Person	6	6	6	6	6	8	2	6	16	4	10	76
Total No. Units	12	12	12	12	12	17	4	12	16	4	20	133

Table 8 – Proposed Duplexes



APARTMENTS:

EVARA – WESTERN SIDE:

Unit No.	Ref.	Description	Floor Area (m ²)	Floor
Block A				
1	1A	1 bed / 2 person	49	Ground
2	2C	2 bed / 4 person	81	Ground
3	2C	2 bed / 4 person	81	Ground
4	1A	1 bed / 2 person	49	Ground
5	1A	1 bed / 2 person	49	Ground
6	2C	2 bed / 4 person	81	Ground
7	1B	1 bed / 2 person	56	Ground
8	1A	1 bed / 2 person	49	Ground
9	1A	1 bed / 2 person	49	1st
10	2A	2 bed / 4 person	81	1st
11	2A	2 bed / 4 person	81	1st
12	1A	1 bed / 2 person	49	1st
13	2B	2 bed / 4 person	79	1st
14	2A	2 bed / 4 person	81	1st
15	2A	2 bed / 4 person	81	1st
16	1A	1 bed / 2 person	49	1st
19	1A	1 bed / 2 person	49	2nd
20	2A	2 bed / 4 person	81	2nd
21	2B	2 bed / 4 person	79	2nd
22	1A	1 bed / 2 person	49	2nd
23	2B	2 bed / 4 person	79	2nd
24	2A	2 bed / 4 person	81	2nd
25	2A	2 bed / 4 person	81	2nd
26	1A	1 bed / 2 person	49	2nd
29	1A	1 bed / 2 person	49	3rd
30	2A	2 bed / 4 person	81	3rd
31	2A	2 bed / 4 person	81	3rd
32	1A	1 bed / 2 person	49	3rd
33	2B	2 bed / 4 person	80	3rd
34	2A	2 bed / 4 person	81	3rd
35	2A	2 bed / 4 person	81	3rd
36	1A	1 bed / 2 person	49	3rd
39	1A	1 bed / 2 person	49	4th
40	2A	2 bed / 4 person	81	4th
41	2A	2 bed / 4 person	81	4th
42	1A	1 bed / 2 person	49	4th
43	2B	2 bed / 4 person	79	4th
44	2A	2 bed / 4 person	81	4th
45	2A	2 bed / 4 person	81	4th
46	1A	1 bed / 2 person	49	4th
Total 40 No.			2,699 m²	



Unit No.	Ref.	Description	Floor Area (m ²)	Floor
Block B				
1	1A	1 bed / 2 person	49	Ground
2	2C	2 bed / 4 person	81	Ground
3	2C	2 bed / 4 person	81	Ground
4	1A	1 bed / 2 person	49	Ground
5	1A	1 bed / 2 person	49	Ground
6	2C	2 bed / 4 person	81	Ground
7	1B	1 bed / 2 person	56	Ground
8	1A	1 bed / 2 person	49	Ground
9	1A	1 bed / 2 person	49	1st
10	2A	2 bed / 4 person	81	1st
11	2A	2 bed / 4 person	81	1st
12	1A	1 bed / 2 person	49	1st
13	2B	2 bed / 4 person	79	1st
14	2A	2 bed / 4 person	81	1st
15	2A	2 bed / 4 person	81	1st
16	1A	1 bed / 2 person	49	1st
19	1A	1 bed / 2 person	49	2nd
20	2A	2 bed / 4 person	81	2nd
21	2A	2 bed / 4 person	81	2nd
22	1A	1 bed / 2 person	49	2nd
23	2B	2 bed / 4 person	79	2nd
24	2A	2 bed / 4 person	81	2nd
25	2A	2 bed / 4 person	81	2nd
26	1A	1 bed / 2 person	49	2nd
29	1A	1 bed / 2 person	49	3rd
30	2A	2 bed / 4 person	81	3rd
31	2A	2 bed / 4 person	81	3rd
32	1A	1 bed / 2 person	49	3rd
33	2B	2 bed / 4 person	80	3rd
34	2A	2 bed / 4 person	81	3rd
35	2A	2 bed / 4 person	81	3rd
36	1A	1 bed / 2 person	49	3rd
39	1A	1 bed / 2 person	49	4th
40	2A	2 bed / 4 person	81	4th
41	2A	2 bed / 4 person	81	4th
42	1A	1 bed / 2 person	49	4th
43	2B	2 bed / 4 person	79	4th
44	2A	2 bed / 4 person	81	4th
45	2A	2 bed / 4 person	81	4th
46	1A	1 bed / 2 person	49	4th
Total 40 No.			2,696 m²	



KELLAND – EASTERN SIDE:

Unit No. / Ref.	Description	Floor Area (m ²)	Floor
Block A1			
A1	2 bed / 4 person	82.87	Ground
A1	2 bed / 4 person	82.87	Ground
A1	2 bed / 4 person	82.87	1st
A1	2 bed / 4 person	82.87	1st
D	2 bed / 3 person	77.6	1st
A1	2 bed / 4 person	82.87	1st
A2	2 bed / 4 person	82.69	1st
C	1 bed / 2 person	49.25	1st
A1	2 bed / 4 person	82.87	2nd
A1	2 bed / 4 person	82.87	2nd
C	1 bed / 2 person	49.25	2nd
A2	2 bed / 4 person	82.69	2nd
A1	2 bed / 4 person	82.87	2nd
B	2 bed / 4 person	81.75	2nd
A1	2 bed / 4 person	82.87	3rd
A1	2 bed / 4 person	82.87	3rd
C	1 bed / 2 person	49.25	3rd
A2	2 bed / 4 person	82.69	3rd
A1	2 bed / 4 person	82.87	3rd
B	2 bed / 4 person	81.75	3rd
A1	2 bed / 4 person	82.87	4th
A1	2 bed / 4 person	82.87	4th
C	1 bed / 2 person	49.25	4th
A2	2 bed / 4 person	82.69	4th
A1	2 bed / 4 person	82.87	4th
B	2 bed / 4 person	81.75	4th
Total 26 No.		2,010.79 m²	



Unit No. / Ref.	Description	Floor Area (m ²)	Floor
Block B1			
1	2 bed / 4 person	82.39	Ground
2	2 bed / 4 person	82.6	Ground
3	2 bed / 4 person	80.57	Ground
4	2 bed / 4 person	84.29	Ground
5	2 bed / 4 person	82.4	Ground
6	2 bed / 4 person	79.85	Ground
7	2 bed / 4 person	82.39	1st
8	2 bed / 4 person	82.6	1st
9	2 bed / 4 person	80.57	1st
10	2 bed / 4 person	84.92	1st
11	2 bed / 4 person	82.4	1st
12	2 bed / 4 person	79.85	1st
13	2 bed / 4 person	82.61	1st
14	2 bed / 4 person	83.02	1st
15	2 bed / 4 person	82.39	2nd
16	2 bed / 4 person	82.6	2nd
17	2 bed / 4 person	80.57	2nd
18	2 bed / 4 person	84.92	2nd
19	2 bed / 4 person	82.4	2nd
20	2 bed / 4 person	79.85	2nd
21	2 bed / 4 person	82.61	2nd
22	2 bed / 4 person	85.02	2nd
23	2 bed / 4 person	82.39	3rd
24	2 bed / 4 person	82.6	3rd
25	2 bed / 4 person	80.57	3rd
26	2 bed / 4 person	84.92	3rd
27	2 bed / 4 person	82.4	3rd
28	2 bed / 4 person	79.85	3rd
29	2 bed / 4 person	82.61	3rd
30	2 bed / 4 person	85.02	3rd
31	3 bed / 5 person	103.33	4th
32	2 bed / 4 person	82.6	4th
33	2 bed / 4 person	82.6	4th
Total 33 No.		2,742.34 m²	



Unit No. / Ref.	Description	Floor Area (m ²)	Floor
Block C1			
1	2 bed / 4 person	85.02	Ground
2	2 bed / 4 person	82.61	Ground
3	1 bed / 2 person	53.08	Ground
4	2 bed / 4 person	84.92	Ground
5	2 bed / 4 person	82.45	Ground
6	1 bed / 2 person	53.08	Ground
7	2 bed / 4 person	82.39	1st
8	2 bed / 4 person	82.6	1st
9	1 bed / 2 person	53.08	1st
10	2 bed / 4 person	84.92	1st
11	2 bed / 4 person	82.4	1st
12	1 bed / 2 person	53.08	1st
13	2 bed / 4 person	82.61	1st
14	2 bed / 4 person	85.02	1st
15	2 bed / 4 person	82.39	2nd
16	2 bed / 4 person	82.6	2nd
17	1 bed / 2 person	53.08	2nd
18	2 bed / 4 person	84.92	2nd
19	2 bed / 4 person	82.4	2nd
20	1 bed / 2 person	53.08	2nd
21	2 bed / 4 person	82.61	2nd
22	2 bed / 4 person	85.02	2nd
23	2 bed / 4 person	82.39	3rd
24	2 bed / 4 person	82.6	3rd
25	1 bed / 2 person	53.08	3rd
26	2 bed / 4 person	84.92	3rd
27	2 bed / 4 person	82.4	3rd
28	1 bed / 2 person	53.08	3rd
29	2 bed / 4 person	82.61	3rd
30	2 bed / 4 person	85.02	3rd
31	3 bed / 5 person	121.21	4th
32	2 bed / 4 person	82.6	4th
33	2 bed / 4 person	82.61	4th
Total 33 No.		2,545.83m²	

Unit Mix	Block A1	Block B1	Block C1	Block A	Block B	Overall Total No.
1 Bed / 2 Person	4	0	8	17	17	46
2 bed / 3 person	1	0	0	0	0	1
2 Bed / 4 Person	21	32	24	23	23	123
3 Bed / 5 Person	0	1	1	0	0	2
Total	26	33	33	40	40	172

Table 9 – Proposed Apartments



Unit Type	1 bed	2 bed / 3 person	2 bed / 4 person	3 bed	4 bed	4 / 5 bed	Total No.	% Mix
Houses	0	0	30	243	26	7	306	50%
Duplexes	11	0	46	76	0	0	133	22%
Apartments	46	1	123	2	0	0	172	28%
Total No.	57	1	199	321	26	7	611	100%
% Mix	9%	1%	32%	54%	4%	1%	100%	

Table 10 – Overall Dwelling Mix

Unit Type	Total Unit No.	Total Residential Floor Area (m ²)
Houses	306	34,946.9m ²
Duplex	133	13,569.15m ²
Apartments	172	12,690.96m ²
Total	611	61,207.01m²

Table 11 – Overall Residential Floor Area

7.8 Proposed Gross Floor Area

The proposed residential accommodation comprises a total of 61,207.01m² gross floor area. The proposed non-residential element comprises a crèche of c.630.1m². The total gross floor area proposed is 61,837.11m².

- Residential floor space – 61,207.01m²,
- Crèche - 630.1m²,
- Total floor area – 61,837.1m².

A full schedule of the proposed residential accommodation is set out in the enclosed Housing Quality Assessment (HQA) – please refer to same.

7.9 Plot Ratio

The proposed development has total floor area of 61,837.1m² (including the crèche) and based upon the gross site area of 186,702m², produces a plot ratio of 0.33. If the net developable area is considered only (122,247m²), the resultant plot ratio is 0.50.

7.10 Site Coverage

The proposed site coverage for the total site area is c. c.27%, and for the net developable area is c.54%.

The site coverage is illustrative of the constraints of the site, all previously described in detail, which reduce the developable area of the site. After factoring in retention of hedgerows, riparian strips, wayleaves, topographical issues, public and communal open space requirements, and other such issues, the available site for building footprint is much reduced.

Given the site characteristics, the site coverage is considered to be entirely consistent with the character of the surrounding area and reflects the balance that the planning policy context sets in terms of seeking to maximise the use of available and zoned land whilst protecting natural features and respecting the character of the surrounding area.



7.11 Apartment Standards

The proposed development caters for 611 no. residential dwellings, including 172 no. apartments and 133 no. duplex units. The proposed apartments and duplex units have been designed in accordance with the Specific Planning Policy Requirements (SPPRs) of the “Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023)” (hereafter “the Apartment Guidelines”).

NOTE: We note the issuing of updated guidelines by the Minister i.e. the Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025 which supersede the 2023 Apartment Guidelines. However, we understand that the most recent guidelines are now subject to a judicial review process and that the High Court is to hear a legal challenge in December on same. Taking this into consideration, the proposed apartments / duplex units have been designed in accordance with the preceding 2023 Apartment Guidelines which require larger units and more onerous standards than the 2025 guidelines.

The 2023 Apartment Guidelines detail standards relating to the development of new apartment schemes, which are replicated in the existing South Dublin CDP. The Apartment Guidelines contain 7 no. SPPRs which Planning Authorities and An Coimisiún Pleanála are required to apply in carrying out their functions. These SPPRs, and the proposed development’s compliance with same, are addressed below.

Please note however, that within the submitted Statement of Consistency (i.e. sections 5.3 and 5.4) details of the proposed development’s compliance with both the Sustainable Urban Housing: Design Standards for New Apartments (2023) and the Planning Design Standards for Apartments (2025), respectively are set out.

SPPR 1 of the 2023 Apartment Guidelines states:

“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).”

The proposed development consists of 611 no. residential dwellings, comprised of

- 306 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached & terraced houses,
- 133 no. 1, 2 & 3 bed duplex units in 12 no. 2-3 storey blocks, and
- 172 no. 1, 2 & 3 bed apartments in 5 no. buildings ranging in height from 4-5 & 5 storeys.

The proposed 305 no. apartment / duplex units are further broken down into:

- 57 no. one-bed units,
- 170 no. two-bed units and
- 78 no. three-bed units.

The number of proposed one-bed apartment / duplex units represents c.19% of the total apartment / duplex mix, and c.9% of the overall proposed quantum of housing within the development. There are no studio units proposed. The proposed development is therefore compliant with SPPR 1 of the Apartment Guidelines



SPPR 2 of the 2023 Apartment Guidelines states:

“For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development.*

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.”

The proposed development does not cater for a building refurbishment scheme or urban infill scheme and therefore SPPR 2 of the Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 2 of the Apartment Guidelines. Notwithstanding same, as detailed above, the proposed development is compliant with SPPR 1 of the Apartment Guidelines and is therefore considered compliant with SPPR 2 of the Apartment Guidelines.

SPPR 3 of the 2023 Apartment Guidelines states the minimum floor areas for apartments, being:

- 37 sq.m for studios,
- 45 sq.m for 1 bed apartments,
- 63 sq.m for 2 bed / 3 person apartments,
- 73 sq.m for 2 bed / 4 person apartments,
- 90 sq.m for 3 bed apartments.

As detailed on the submitted floor plan drawings prepared by MCORM & Davey+Smith Architects, all the proposed apartment / duplex units meet with and/or exceed the minimum apartment floor areas stated in SPPR 3 of the Apartment Guidelines. The proposed development is therefore compliant with SPPR 3 of the Apartment Guidelines.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the Apartment Guidelines – please refer to same.

SPPR 4 of the 2023 Apartment Guidelines has regard to dual aspect units and states the following:

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

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



In relation to the above, the subject site is considered a “suburban or intermediate location”. SPPR 4 of the Apartment Guidelines states there shall generally be a minimum 50% dual aspect ratio at such locations. Table 12 below sets out the quantum and percentage of single, dual and triple aspect apartment / duplex units proposed within the development; however, we also refer the Planning Authority to the submitted HQA and block plans prepared by MCORM & Davey+Smith Architects for further details.

Table 12 below provides a summary of the aspect of the proposed apartments and duplex units:

Block	Total No. of Units	No. of Single Aspect Units	No. of Dual Aspect Units	No. of Triple Aspect Units
Apartment A	40	20	20	0
Apartment A1	26	8	16	0
Apartment B	40	20	20	0
Apartment B1	33	12	21	0
Apartment C1	33	17	15	1
Duplex Block A	12	8	4	0
Duplex Block B1	12	8	4	0
Duplex Block B2	12	8	4	0
Duplex Block B3	12	8	4	0
Duplex Block D	12	8	4	0
Duplex Block D1	17	0	17	0
Duplex Block E1	4	0	0	4
Urban Block F1	12	0	8	4
Urban Block G1	16	0	12	4
Urban Block G2	4	0	4	0
Urban Block H1	20	0	20	0
Total	305	117 (c.38%)	173 (c.57%)	13 (c.4%)

Table 12: Aspect of Proposed Apartments & Duplex Units.

As detailed in Table 12 above, and on both the submitted HQA and block drawings prepared by MCORM & Davey+Smith Architects which accompany this application, the proposed development is compliant with SPPR 4 of the Apartment Guidelines.

SPPR 5 of the 2023 Apartment Guidelines has regard to floor to ceiling heights and states the following:

“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 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.”

All the proposed ground level apartments achieve the minimum of 2.7m floor to ceiling height as required. Please refer to the submitted block plans prepared by MCORM & Davey+Smith Architects for full details.

The proposed development is therefore compliant with SPPR 5 of the Apartment Guidelines.



SPPR 6 of the 2023 Apartment Guidelines has regard to the maximum number of apartments per floor per core and states the following:

“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.”

All the proposed apartment / duplex blocks are designed to ensure the stated units per floor per core is not exceeded. The highest number of units accessed from a single core is 8 no. in Blocks A, B and B1. Please refer to the submitted block plans prepared by MCORM & Davey + Smith Architects for full details. The proposed development is therefore compliant with SPPR 6 of the Apartment Guidelines.

SPPR 7 of the 2023 Apartment Guidelines has regard to shared accommodation/co-living developments:

“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”.

The proposed development does not cater for any shared accommodation/co-living units and, therefore, SPPR 7 of the Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 7 of the Apartment Guidelines.

The Apartment Guidelines provide for highest quality living standards for new apartment schemes in Ireland. The proposed development's compliance with all applicable SPPRs of the Apartment Guidelines has been outlined above and it is therefore considered the proposed apartments and duplex units within the proposed LRD are representative of a high-quality standard.

In addition to the above SPPRs, the Apartment Guidelines also detail several other considerations for new developments containing apartments. Most of these additional considerations are discussed in later sections of this Statement (i.e., car and bicycle parking, communal open space, children's play facilities etc.) and we respectfully refer the Planning Authority to same for further details. In addition, section 5.3 of the submitted Statement of Consistency provides full details of the proposed development's compliance with the Apartment Guidelines. Notwithstanding same, the following considerations of the Apartment Guidelines are noted:

- **Section 2.4** of the Apartment Guidelines identifies of the types of location that may be suitable for apartment development, with the guidelines outlining three types of locations as follows:
 - Central and/or Accessible Urban Locations,
 - Intermediate Urban Locations,
 - Peripheral and/or Less Accessible Urban Locations,

The criteria for determining these locations and the scale of apartment development that is considered appropriate at each location is also provided.

In this context the subject site is considered a “Intermediate Urban Location” having regard to the proximity to public transport. The proposed development will provide for connectivity to the Fortunestown Luas Stop via Carrigmore, which will be a circa 8 minute walk from the northern portion of the proposed development and approximately 10 minutes from the southern portion.



In respect of this type of location, the Guidelines state that:

"Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net), including:

- *Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services. The range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors".*

It is accepted however that the subject site also displays some characteristic of peripheral locations. In this respect, the density of the proposed development has taken into account the fact that the site could be considered to straddle these two location types as set out in the Guidelines.

The net density is calculated in accordance with the guidance set out in the Compact Settlement Guidelines for Planning Authorities (2024), and based upon the requirements of these Guidelines, the subject site has a net developable area of c.12.2Ha, upon which it is proposed to develop 611 no. dwellings, thus equating to a net density of c.50 units per hectare across the entire site. In accordance with the Compact Settlement Guidelines, the following areas within the site have been discounted to calculate the resultant net density:

- Land reserved for a future school - c.1.03 Ha (10,311sq.m),
- Designated flood zone - c.0.69Ha (6,892sq.m),
- Two no. drainage wayleaves traversing the site - c.1.33Ha (13,312sq.m),
- South-western portion above the 120m contour line / steeply sloped part of the site - c.0.49 Ha (4,972sq.m)
- Hedgerow along the western boundary and its 10m buffer zone - c. 0.66Ha (6,581sq.m),
- 10m buffer from the top of the stream bank along the eastern boundary - c. 1.24Ha (12,440sq.m)
- Area occupied by central ditch - c.0.8Ha (8,044sq.m)
- The centrally located north-south "Link Street" c. 0.4Ha (4,024sq.m).
- Total = c.6.45Ha (64,455sq.m)
- Resultant net developable area = c.12.2Ha (122,247sq.m)

The above provides a total of c.6.45 hectares that is undevelopable and can therefore be discounted to calculate the net developable area / net density of development. The net developable area of the subject site is therefore c.12.2 hectares upon which it is proposed to develop 611 no. dwellings, thus producing a net density of 50 units per hectare across the entire site. This aligns with the Sustainable Development and Compact Settlement Guidelines, which recommend a range of 40–80 dwellings per hectare on the subject site.

- **Section 3.8** of the Apartment Guidelines requires the majority of all apartments in any scheme of 10 or more apartments exceed the stated minimum floor area standards by a minimum of 10%.

In compliance with the above requirement, the proposed apartments & duplex units should have a total minimum floor area of 19,896sq.m. An additional 10% of same would equate to 21,885.6sq.m. The 268 no. proposed apartment / duplex units, has a total floor area of 23,449.47sq.m thus exceeding the minimum floor area standard by more than 10%.



- **Section 3.30** of the Apartment Guidelines states all proposed units should provide for the general storage and utility in line with the minimum requirements detailed in Appendix 1 of the Apartment Guidelines. These standards are as follows:
 - Studio Unit – 3 sq.m
 - One bedroom unit – 3 sq.m
 - Two bedroom (three person unit) – 5 sq.m
 - Two bedroom (four person unit) – 6 sq.m
 - Three person unit – 9 sq.m

As detailed on the submitted floor plans prepared by MCORM & Davey+Smith Architects, all proposed apartment / duplex units comply with this requirement for storage.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the Apartment Guidelines.

- **Sections 3.35 – 3.36** of the Apartment Guidelines states all proposed units should be provided with private amenity space in the form of patios / terraces for ground floor units and balconies for upper floor units in line with the minimum requirements detailed in Appendix 1 of the Apartment Guidelines. These standards are as follows:
 - Studio Unit – 4 sq.m
 - One bedroom unit – 5 sq.m
 - Two bedroom (three person unit) – 6 sq.m
 - Two bedroom (four person unit) – 7 sq.m
 - Three person unit – 9 sq.m

As detailed on the submitted floor plans prepared by MCORM & Davey+Smith Architects all proposed apartment / duplex units comply with this requirement for private amenity space.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the Apartment Guidelines.

- **Section 6** of the Apartment Guidelines has regard to "Apartments and the Development Management Process". Within same, the following are noted:
 - Section 6.1 states all applications for apartment schemes must submit a schedule detailing the number and type of apartments and associated individual unit floor areas.
 - Section 6.12 of the Apartment Guidelines states planning applications for apartment development shall include a building lifecycle report, including for an assessment of long term running and maintenance costs and measures specifically considered to effectively manage and reduce costs for the benefit of residents.

As required, a Building Life Cycle Report has been prepared by Armstrong Fenton Associates and is submitted as part of this LRD planning application as a separate, standalone report – please refer to same.

The number and type of apartments, and their associated individual unit floor areas are all detailed in the submitted HQA – please refer to same.

- **Appendix 1** of the Apartment Guidelines details the minimum room widths / areas / aggregate areas for individual kitchen/living/dining and bedrooms for apartments.

As detailed on the submitted floor plans prepared by MCORM & Davey+Smith Architects, all proposed apartments and duplex units comply with the requirement, and as confirmed in the submitted HQA – please refer to same.

8.13 Building Heights

- 2 Storey
- 3 Storey
- 5 Storey
- Main gateways



Fig. 29 – Building Height

A varied height strategy has been employed across the entire site, with particular regard had to topography of the site and character of the receiving environs. The varied height in units begins at 2-3 storey typologies at the southern end of the site, at the entrance to the development from the Boherboy Road, which front onto the main north-south link street thus creating strong building edge along same. The southern most buildings are set back substantially from the southern boundary having regard to the semi-rural nature of the site from this point.

As one moves northwards through the site, the building height increase with prominent components of 4-storeys at northern, central and southern locations and a 5-storey apartment cell north of the site.

The three storey elements, both duplex buildings and houses are distributed homogeneously across the site and mainly located fronting on to proposed parks and along the central green spine.

Four storey buildings form part of duplex buildings that feature prominent elements onto the northern and southern gateways, in addition to the green spine western contiguous elevation, after the future school site when coming from the north.

The tallest buildings at 4-5 and 5 storeys take advantage of the highest proximity to public transport services and present a consistent image of the development when accessing from the north along the main link street and therefore enhance diversity of typologies and range of tenure at this location. These higher blocks are situated in the lowest part of the site which is suitable for this increased scale within the development serving as an urban edge to the lands to the north. The apartment blocks are also designed to offer overlooking and surveillance over the western and eastern site boundaries, the school site and the northern public open space.

The reservation for the future school site along with the existing wayleaves separates the northern and central portions of the site. The central portion of the site reduces down from the 4/5 storey feature element of the apartments to two/three storey duplex blocks, and a two storey creche and 3 storey terraced housing facing the linear park to the east, both offering a strong building edge to form the entrance to the central portion of the site.

Cognisance has been paid to the Section 28 Guidelines for Planning Authorities on Building Heights and Urban Development, 2018 (as amended) which carry forward the National Policy Objectives from the National Planning Framework in relation to securing more compact forms of urban development. Essentially, these Guidelines seek to reinforce wider national policy objectives to provide more compact forms of urban development and to consolidate and strengthen the existing built up area. The Guidelines set out a number of Strategic Planning Policy Requirements (SPPRs) and pursuant to Section 28(1C) of the Planning and Development Act 2000 (as amended) and Section 9(3) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) Planning Authorities and An Bord Pleanála must comply with SPPRs in the performance of its function, and the SPPRs stated in the document take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. The Guidelines also state that in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in town/city cores and in other urban locations with good public transport accessibility.

The proposed building heights are put forward for permission having regard to the 2018 Guidelines for Planning Authorities on Building Heights and Urban Development, including its specific planning policy requirements (SPPRs), as well as design and density guidance set out in the 2024 Guidelines for Planning Authorities on Sustainable and Compact Settlements.

We note that as part of the previous application on this site (which also proposed apartment building heights of 4 to 5 storeys), that the An Bord Pleanála Inspector noted the following in relation to those building heights: *"I note that the proposed apartment blocks at 5 storeys in height are in closest proximity to the existing public transport connections to the north of the site, and in this context, I consider that a higher density and thus greater height is appropriate at this location"*. In the same assessment (Ref. ABP-313145-22), the Inspector concluded on the subject of building height that: *"Having regard to the foregoing, the proposed development would provide two-storey houses, three-storey duplex apartment blocks, and four to five-storey apartment buildings with an acceptable density, in the context of the Compact Settlement Guidelines (2024) and the Core Strategy as noted above. I have no objection in principle to the heights proposed having regard to the site's location and context relative to its surroundings and I consider that the proposed development does not contravene the Development Plan in respect of building height, in particular the BHDG and the*



specific provisions of the Building Height Guidelines and the NPF in respect to compact growth”.

The current application, in line with the objectives of the previous LAP and the SPPRs in the current Guidelines, propose that the apartments buildings of 4 - 5 storeys tall will be located at the northern end of the site, at its lowest point and in closest proximity to public transport infrastructure. The apartment blocks are also designed to offer overlooking and surveillance over the western and eastern site boundaries, the reserved school site and the northern public open space.

It is acknowledged that the height of the proposed apartment blocks exceed the LAP, which has now expired, but as outlined above, based upon national guidance on building heights, it is put forward that the area located to the north of the site can justify a higher density, given its proximity to the LUAS network and lower topography, and this was previously accepted in principle by the An Bord Pleanála Inspector in the previous SHD application. Although taller than the typical established height of residential development on the neighbouring boundaries, the apartments will also form a strong built edge and good passive surveillance.

7.12 Aspect

A detailed housing quality assessment (HQA) is submitted as part of this LRD planning application that includes details of the aspect of the individual units. Table 12 on page 96 provides a summary of the aspect of apartments and duplex units in each block.

Out of the 305 no. proposed apartments and duplex unit, 57% are dual aspect, 38% are single aspect and 4% are triple aspect.

The 2023 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, under section “Dual Aspect Ratios” and specifically SPPR4 of same require *“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”*, and the proposed development complies with this.

All houses are dual aspect dwellings.

7.13 Daylight / Sunlight Analysis

The proposed development has been assessed in terms of sunlight / daylight and shadow analysis, with the submitted assessment being prepared by Digital Dimensions. Digital Dimensions have prepared the enclosed Daylight/Sunlight Assessment of the proposed apartment units which confirms that all habitable rooms meet the minimum standard for daylight provision as per BS EN 17037:2018+A1:2021 as referred to in the BRE guidelines BR209:2022 (third edition). The enclosed assessment also states that the assessment of daylight is in accordance with IS EN 17037:2018, shown for supplementary information, the vast majority of habitable rooms achieve daylight provision as set out in IS EN 17037:2018. The assessment also states that all habitable rooms within the proposed development achieve the minimum target daylight levels set out in BS EN 17037:2018+A1:2021, as referred to in the BRE guidelines BR209:2022 (third edition) and no compensatory measures are required. We refer the reader to the enclosed Daylight/Sunlight Assessment for full details.



7.14 Proposed Non-Residential Elements - Creche

The proposed development includes for one non-residential use; being a proposed childcare facility which measures c.630.1sq.m in a standalone 2 storey dedicated facility, located in north-eastern part of the site, south of Apartment Block C1.

Based on the proposed development of 611 no. residential dwellings and the requirements of the “Childcare Facilities Guidelines for Planning Authorities” (2001), which state provision should be made in new developments for 20 no. childcare places for every 75 no. dwellings, the proposed development would have a requirement to provide for a childcare facility catering for 163 no. childcare places. It is noted; however, that section 4.7 of the Apartment Guidelines states, in relation to childcare facilities: “*One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms*”. The proposed development includes 57 no. one bed units.

Discounting the 57 no. proposed one bed units, the proposed development caters for 554 no. dwellings for the purposes of assessing the childcare requirements and based on the provision of 20 no. childcare places for every 75 no. dwellings, the development therefore has a requirement to provide for a childcare facility catering for 148 no. childcare places.

The proposed childcare facility has been designed to be of a size capable of catering for 148 no. childcare places. The 2001 Guidelines apply a minimum floor space per child of 2.32sq.m, exclusive of kitchen, bathroom and hall, furniture or permanent fixtures. Applying that standard, a childcare facility to serve the proposed development and meeting the requirement for c. 148 childcare spaces would need to be a minimum of c. 343sq.m net floor area.

The location of the childcare facility within the layout has sought to ensure the facility is centrally located within the scheme and easily accessible to all residents. There are two areas of dedicated outdoor play space for the creche, totalling 314.2sq.m.

The proposed floor area of the crèche i.e. 630sq.m therefore exceeds the minimum requirement as set out in the 2001 Childcare Facilities – Guidelines for Planning Authorities by c.286sq.m, and includes sufficient additional floorspace to accommodate toilets, sleep room, reception, staff area, circulation and escape route spaces, furniture and permanent fixtures as required, and can adequately cater for the required 148no. childcare spaces.

In consideration of the overall gross floor area of the proposed creche, along with the availability of existing childcare facilities in the environs (as identified in Section 4.2 of the submitted Social Infrastructure Assessment), it is put forward that the proposed creche is of an appropriate size and scale to cater for the proposed development.

Given all the foregoing, it is respectfully submitted the proposed development caters for the appropriate provision of childcare place and is compliant with the 2001 “Childcare Facilities Guidelines for Planning Authorities”.

7.15 Community Facilities

Whilst expired, we note that objective LUD1 of the 2012 Fortunestown LAP included a requirement which sought that a minimum of 300sqm of community floorspace be provided for every new 1,000 new dwellings delivered, i.e. “*Provide community facilities, which shall include youth specific facilities, across the Plan Lands at a rate of 300 sq.m per 1,000 dwellings. (Objective LUD1)*”.

We also note that the current CDP contains a number of policies/objectives referring to the provision of community infrastructure, such as:



- **Policy COS3: Community Centres** - Ensure that communities across the county have access to multifunctional and intergenerational community centres that provide a focal point for community activities.
- **COS3 Objective 1:** To investigate, where new provision is required to meet the needs of the population, the feasibility of extending existing community centres on suitable sites, where siting, layout, design, access and other planning considerations allow.
- **COS3 Objective 2:** To ensure the provision of new community centres in new and existing development areas or where provision is the responsibility of the developer, the Council will ensure the developer provides, in proximity to the population they serve and in accordance with the standard of one centre per 8,000 population with a size of approximately 1,200-1,800 sq.m, or dependent on specific local demographic or other needs, smaller centres at a more local level, generally between 350-650 sq.m in size at the discretion of the Council, or as may be updated by any future community centre strategy carried out by the Council.
- **COS3 Objective 3:** To provide discretion to the Council to require residential or mixed used developments in new development areas to provide a pro rata contribution towards the provision of a community centre, in accordance with the standards set out in COS3 Objective 2 and in line with the Development Contribution Scheme.

In the LRD Opinion issued by the Planning Authority for this proposed LRD (Ref. LRDOP00325), item 7 of the information to be addressed / submitted with the final LRD application states: “**Community Infrastructure** - The applicant is strongly encouraged to engage with the SDCC Planning Delivery Team regarding the provision of community floorspace prior to submitting the final planning application, with the aim of reaching agreement on the quantum to be levied in lieu of on-site delivery”.

The Applicants and their representatives have held discussions with Eoin Burke, Director of Planning and Transport in South Dublin County Council (SDCC) in order to agree a financial contribution in lieu of the provision of community floorspace within the proposed development. The outcome of these discussions has resulted in a financial contribution figure being agreed in principle between the Applicants and SDCC, based on the estimated cost of constructing a new community facility in Citywest, which is the preference of SDCC. We understand that the planned Citywest Community Space will be 1,026.9sq.m in floor area, and SDCC has informed us that the rate of constructing same per square metre is €2,921.40 per sq.m.

Given the previous objective in the now expired Fortunestown LAP, i.e. “Provide community facilities, which shall include youth specific facilities, across the Plan Lands at a rate of 300 sq.m per 1,000 dwellings. (Objective LUD1)”, the proposed development of 611 no. dwellings equates to 61% of this requirement, which would also equate to a community facility of c.183sq.m required to serve the proposed development of 611 no. units. In applying the current rate of €2,921.40 per sq.m to the provision of a facility of 183sq.m, equates to €534,616.20.

In line with the aforementioned policy and objectives of the CDP, i.e. Policy COS 3, Objective COS3 Objective 1, Objective 2 and Objective 3, the Applicants are satisfied to pay the above cost of **€534,616.20** by way of a financial contribution(s) attached to a grant of permission for the proposed LRD, should the Planning Authority require same. We confirm that the Applicants have no objection to such a condition being attached to a decision to grant permission for the proposed LRD, should the Planning Authority be minded to do so, and it is respectfully suggested that such a condition may be worded as follows:

“In lieu of the provision of community floorspace as referenced in the 2022-2028 South Dublin County Development Plan in relation to same, the developer(s) shall pay to the Planning Authority a financial contribution of €534,616.20 towards the delivery of a new community centre in the area. The financial contribution is in lieu of the provision of community floorspace on-site. REASON: To provide for community floorspace in accordance with Policy COS 3, Objective COS3 Objective 1, Objective 2 and Objective 3 of the South Dublin County Development Plan 2022 – 2028”.

Notwithstanding the above, for the avoidance of doubt and in the interests of clarity, we wish to state the Applicants are fully satisfied to pay a financial contribution in lieu (of €534,616.20) of the provision of community floorspace within the proposed development, to be put towards the cost of providing a community centre in the area, in accordance with the objectives of the South Dublin County Development Plan, 2022-2028. The Applicants will adhere to any such condition relating to a financial contribution for community floorspace attached to a forthcoming grant of permission attached to this LRD and **that the payment of such a contribution of €534,616.20 represents the full and final payment of such a contribution in relation to the provision of a community facility for the subject site at Boherboy.**

7.16 Car Parking

In total, the proposed development caters for 861 no. car parking spaces provided for in a mix of on-street and on- curtilage parking.

Parking provision for the houses does not exceed the requirements set out Table 12.26: Maximum Parking Rates (Residential Development)' of South Dublin County Development Plan 2022-2028. Fig. 28, below, illustrates Figure 12.26 of the CDP. It is assumed the proposed development is located in 'Zone 1' (General rate applicable throughout the county).

It is noted the CDP clearly details the car parking standards stated are maximum parking rates and that "the number of spaces provided for any particular development should not exceed the maximum provision. The maximum provision should not be viewed as a target and a lower rate of parking may be acceptable." [our emphasis added].

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

Fig. 28 - Extract of Figure 12.26 of the Existing CDP

The proposed development is located more than 500m from the nearest bus stop or Luas station. Therefore, it is assumed that the site is in Zone 1. There are 306 no. houses proposed as follows:

Unit Type	1 bed	2 bed	3 bed	4 bed	4 / 5 bed	Total No.
Houses	0	30	243	26	7	306

Table 13 – Proposed Schedule of Houses

Based upon the standards set out in the CDP, Table 14 below demonstrates the maximum car parking provision allowable for the proposed development.

Proposed House Types	No. of Units Proposed	Maximum Car Parking Requirement
2 Bed House	30	36
3 Bed House	243	498
4 Bed House	26	52
4 / 5 Bed House	7	14
Total	306	599

Table 14 – Maximum Car Parking Requirement (Based on CDP Standards).

The Development Plan allows for a maximum provision of 599 no. car parking spaces for the proposed houses and in accordance with same 584 no. car parking spaces are provided for the proposed houses in a mix of on-street and on-curtilage parking and based on Table 12.26: Maximum Parking Rates (Residential Development) of South Dublin County Development Plan 2022-2028. The proposed development also provides for 305 no. duplex units and apartments as follows:

Unit Type	1 bed	2 bed	3 bed	Total No.
Duplexes	11	46	76	133
Apartments	46	124	2	172
Total No.	57	170	78	305

Table 15 – Proposed Schedule of Duplex & Apartment Units

In accordance with guidance set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2023 and SPPR3 of same which sets out the quantum of car parking spaces for apartments, the centre of the subject site, where the higher density elements of the development are located, is c. 10-12 minutes walking distance from the Fortunestown Luas Stop. It is a similar distance away from centres of employment such as Citywest Shopping Centre, Citywest Business Park and Magna Business Park. Therefore, the proposed development is considered to be a Central and/or Accessible Urban Location.

Based on the above accessibility to public transport, it is considered that the proposed development is an '*Intermediate Location*'. At intermediate and peripheral locations, defined in SPPR 3 of Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 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. The maximum car parking standards do include provision for visitor parking.

Proposed Unit Types	No. of Units Proposed	Maximum Car Parking Requirement	Car Parking Provided
One Bed Duplex	11	17	11
Two Bed Duplex	46	58	58
Three Bed Duplex	76	76	114
Total	133	151	155

Proposed Unit Types	No. of Units Proposed	Maximum Car Parking Requirement	Car Parking Provided
One Bed Apartment	46	69	19
Two Bed Apartment	124	186	93
Three Bed / Apartment	2	3	3
Total	172	258	115

Table 16 - Car Parking Requirement (Based on Apartment Guidelines Standards).

Therefore, 155 no. spaces will be provided for the duplex units and 115 no. spaces provided for the apartments, equating to a total of 270 parking spaces for the apartments and duplex elements of the proposed development. This equates to a rate of 1.1 space per unit.

The total residential car parking provision is 854 no. spaces, which equates to a ratio of 1.39 spaces per unit.

In addition to all of the above, 7 no. car parking spaces are allocated to the proposed crèche.

In total, 861 no. parking spaces will be provided for the overall development, which accords with local and national policy regarding reduced car parking and maximum standards for same.

The proposed development also caters for an ample provision of bicycle parking as well as the provision of pedestrian and cyclist routes and infrastructure throughout the development. As such, it is considered evident that future residents will have ease of access to, and availability of, good jobs, services, and facilities via sustainable transport modes.

This LRD application for permission is accompanied by a Residential Travel Plan, prepared by Pinnacle Consulting Engineers and is enclosed as a separate document, which sets out measures to encourage future residents to use more sustainable transport modes such as bus services – please refer to same.

For further details on the proposed car parking provisions for the development, we refer the Planning Authority to the submitted transportation drawings and Traffic and Transport Assessment (section 3.4) prepared by Pinnacle Consulting Engineers.

7.17 Bicycle Parking

A total of 711 no. bicycle parking spaces will be provided for the proposed development will be provided as follows:

Type	No. of Spaces
Bicycle Parking (Resi Long Stay)	544
Bicycle Parking (Non-Resi Long Stay) i.e. creche	5
Bicycle Parking (Resi Short Stay)	147
Bicycle Parking (Non-Resi Short Stay)	15
Total Bicycle Parking	711

Table 17 – Proposed Bicycle Parking

It is considered the proposed 306 no. houses will be capable of accommodating bicycle parking within the curtilage of the property.

In terms of the proposed apartments and duplex units, the standards of Table 12.23 of the existing CDP and the Apartment Guidelines, both of which require 1 no. long-term space per bedroom and 1 no. short-term space for every 2 no. apartments, are noted.

Based on the proposed unit mix, the proposed apartments / duplexes are afforded the following bicycle parking provisions:

Unit Type	No. of Units	Long-Term Parking	Short-Term Parking
1 bed	57	57	29
2 bed	170	340	85
3 bed	78	234	39
Total	305	631	153

Table 18 - Bicycle Parking for Proposed Apartment / Duplex Units

Based on the overall proposed development of 611 no. dwellings, the following is the overall bicycle parking provision:

Parking	No. of Spaces	Ratio / Unit
Bicycle Parking (Resi Long Stay)	544	1.78
Bicycle Parking (Non-Resi Long Stay i.e. creche)	5	-
Bicycle Parking (Resi Short Stay)	147	0.48
Bicycle Parking (Non-Resi Short Stay i.e. creche)	15	-
Total Bicycle Parking	711	2.33

Table 19 – Overall Proposed Bicycle Parking Units

7.18 Landscape Strategy and Open Space Provision

7.18.1 Public Open Space Provision

The proposed development provides for approximately 23,654sq.m (c.2.37 hectares) of open space. The subject site has a significant quantum of biodiversity / ecological / riparian buffers, which run along the entire length of the eastern and western boundaries of the site, whereby a minimum 10m buffer from the top of the banks of the streams on both sides of the site is provided for. These two buffers equate to c.2Ha in total. These buffers are free from development and are not proposed as or included in the calculation for public open space.

The proposed development provides for approximately 23,654sq.m (c.2.37 hectares) of open space which equates to c. 13% of the gross site area (c.18.7Ha) or c.19% of the net developable area (c.12.2Ha).

The proposed public open spaces are exclusive of the 10m riparian corridor along the Corbally Stream and the 10m biodiversity corridor proposed along the western boundary of the site. In total, c.3.15Ha of the entire site is reserved for the protection of ecological / biodiversity / riparian buffers and do not form part of the public open space calculation, nor is there any development proposed within these reserved areas / corridors.

As part of the overall development, there is only one underground attenuation tank proposed and this area is not included in the calculation of public open space.

We note that the CDP requirement for the provision of public open space, as per section 8.7.3 of same, states: “*The overall standard for public open space is 2.4 hectares per 1,000 population. This will be applied to all developments with a residential element*”. Furthermore, we note that Table 8.2 of the CDP sets out the public open space standards as follows:

Land Use	Public Open Space Standards (minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area

Fig. 30 – Extract from Table 8.2: Public Open Space Standards of CDP.

Taking the above into account, the 15% public open space requirement for the proposed development on the net developable area of the subject site equates to c.1.8Ha. Therefore, the proposal to provide c. 2.37 Ha of public open space exceeds the minimum requirement.

Notwithstanding the above, in relation to the CDP’s requirement for an overall standard of 2.4 hectares of public open space per 1,000 population, the proposed LRD requires the following public open space provision, based upon the proposed housing mix:

Unit Mix (Total)	No. of Units
1 bed	57
2 bed	200
3 bed	321
4 / 4-5 bed	33
Total Units	611

Table 20 – Overall proposed housing mix

COS5 Objective 6 of the existing CDP states: “*public open space calculations [are required to] be based on an 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.*”

As detailed above, the proposed development caters for 251 no. dwellings with two or fewer bedrooms and 360 no. dwellings with three or more bedrooms. The occupancy rate for the proposed development is therefore as follows:

- 257 no. dwellings x 1.5 persons = 385.5 persons
- 354 no. dwellings x 3.5 persons = 1,239 persons
- Total occupancy = 1,624.5 persons

Based on a provision of 2.4 hectares of public open space per 1,000 population, the proposed development therefore requires the following quantum of public open space:

- 1,624.5 persons / 1000 (population) x 2.4 (hectares of open space) = c.3.8 hectares of public open space.

Notwithstanding the above, the proposed development caters for c.2.37Ha of public open space which equates to c.19% of the net developable area (c.12.2Ha). When one considers all of the environmental exclusion zones on the site in terms of biodiversity buffers etc. that equate to c. 3.15Ha and are not included in the above calculation of public open space it is considered that there is sufficient public open space provision on the site, with the development still achieving a net density of 50 units per hectare across the entire site.

In addition, we note the provision of policy and objective 5.1 "Public Open Space" of the Compact Settlement Guidelines which state the following: *"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"* [our emphasis added].

The CDP requires a minimum 15% public open space provision with the proposed LRD providing c.2.37 hectares of public open space which equates to c.19% of the net developable area (c.12.2Ha). We also note that abutting the site to the north-east is Carrigmore Park of c.4Ha which was previously identified as the District Park for the Fortunestown Area in the now expired LAP. The proposed LRD facilitates new pedestrian / cyclist connections into same, and we also note the approved, extant Part 8 Scheme for improvements to this park. Taking all of the foregoing into account, it is considered that there is sufficient, meaningful public open space provision as part of the proposed development that complies with the minimum standards of the both the CDP and the Compact Settlement Guidelines, and that the permission being sought can be granted.

Please also refer to the enclosed submitted Gannon & Associates, Landscape Architects drawings and landscape design rationale for more details.

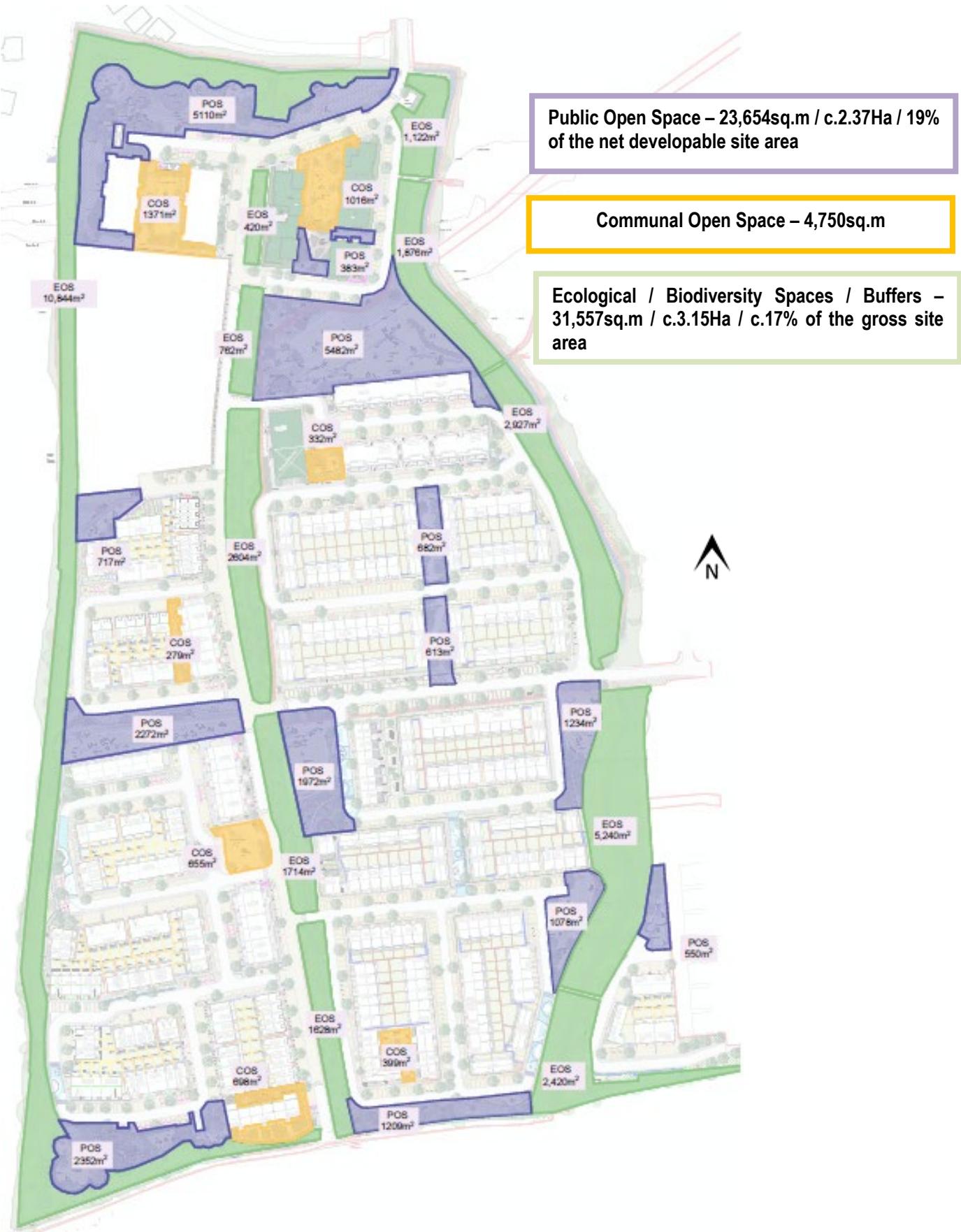


Fig. 31 – Open Space Provision

7.18.1.1 Design & Location of Public Open Space

The landscape character areas are divided into three main categories based on their function: (i) Active Open Space for recreation and community use, (ii) Ecological Riparian Corridors that protect and enhance the site's watercourses and biodiversity, and (iii) Streetscape, which includes shared and playful streets that support safer, more inclusive movement. This division helps to clearly define the role of each space within the overall layout – as per Fig. 31:

ACTIVE OPEN SPACE	
01	Central Ribbon
02	Attenuation & Play Zone
03	Gathering Grove
04	Linear Park
05	Natural Climb

ECOLOGICAL RIPARIAN CORRIDOR	
06	Coldwater Stream
07	Cooldown Stream
08	Corbally Stream

STREETSCAPE	
09	Playful streets



Fig. 32 – Landscape Character Areas

Public Open Space No. 1 – Central Ribbon

This space provides a variety of amenities including kick around areas with seating for viewers built into the landscape, performance spaces, play equipment, workout equipment, places to rest and also integrates in with the adjacent playful streets strategy. The “Central Ribbon” is a route that runs through the site and helps connect the different interactive nodes and spaces along it. At the heart of the scheme is the central Ribbon Park. This park is an important hub for the scheme and provides open space that focuses on function while incorporating the design language and theme of bubbles.



Fig. 33 – Central Public Open Space and Landscape Function

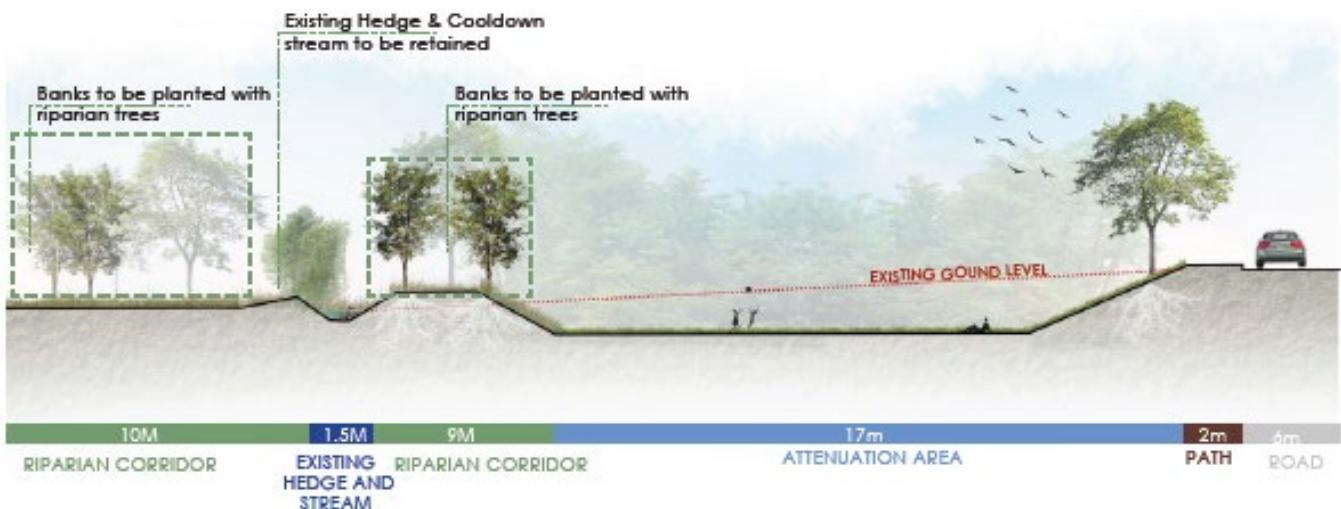


Fig. 34 – Section Through Central Public Open Space

Public Open Space No. 2 – North-East

This space incorporates attenuation features as play areas in a similar manner to the “Nature Climb” zone (public open space No.5). The strategy is to ensure the site is functional all year around through play features including a kickabout area and viewing decks that can be used even during flood events. The design uses cut/fill and the topography to form attenuation areas and landscaped berms.

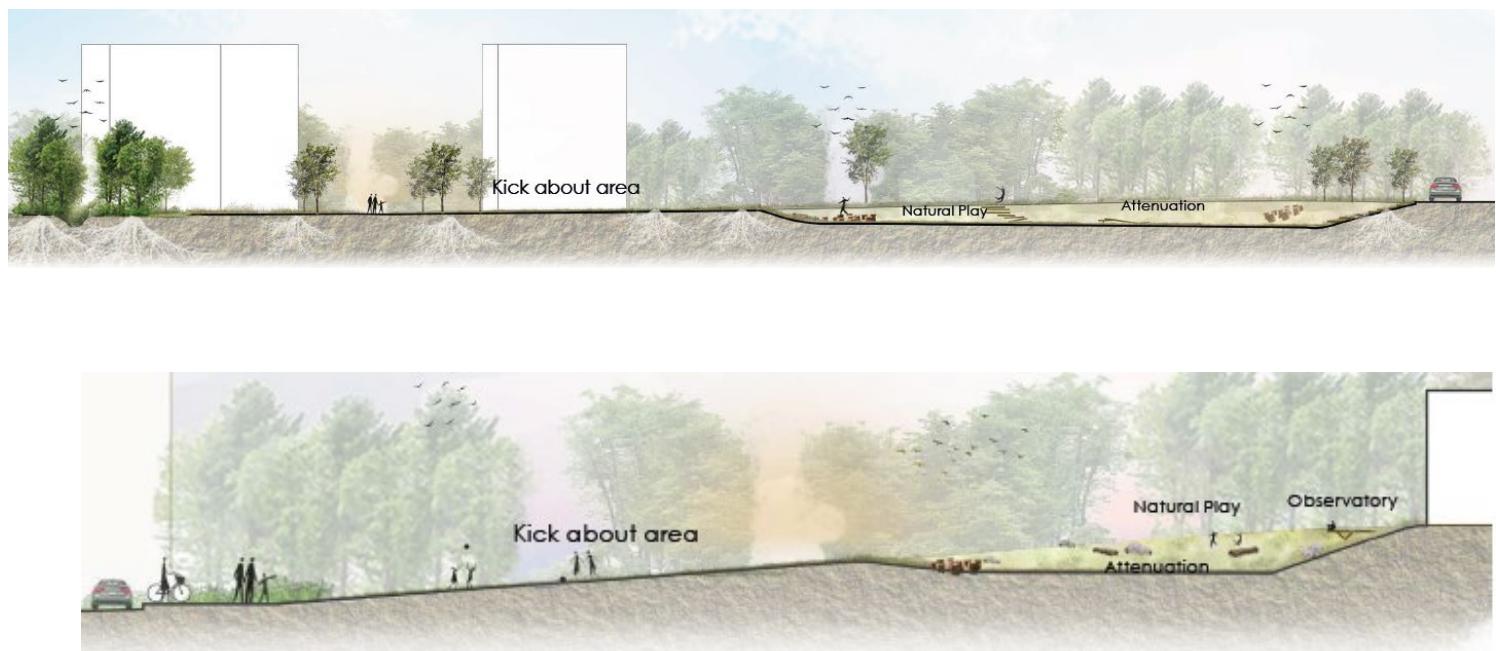


Fig. 35 – Sample section through proposed Public Open Space No. 2



Fig. 36 – Proposed Public Open Space No. 2

Public Open Space No. 3 – Gathering Grove / Southern part of site

This space occupies two areas in the southern part of the site, east and west of the main access into the site from the Boherboy Road. This landscaped zone continues on the blue ribbon footpath while creating spaces for people to meet along it. The gathering grove gives the users a space to meet and experience nature.

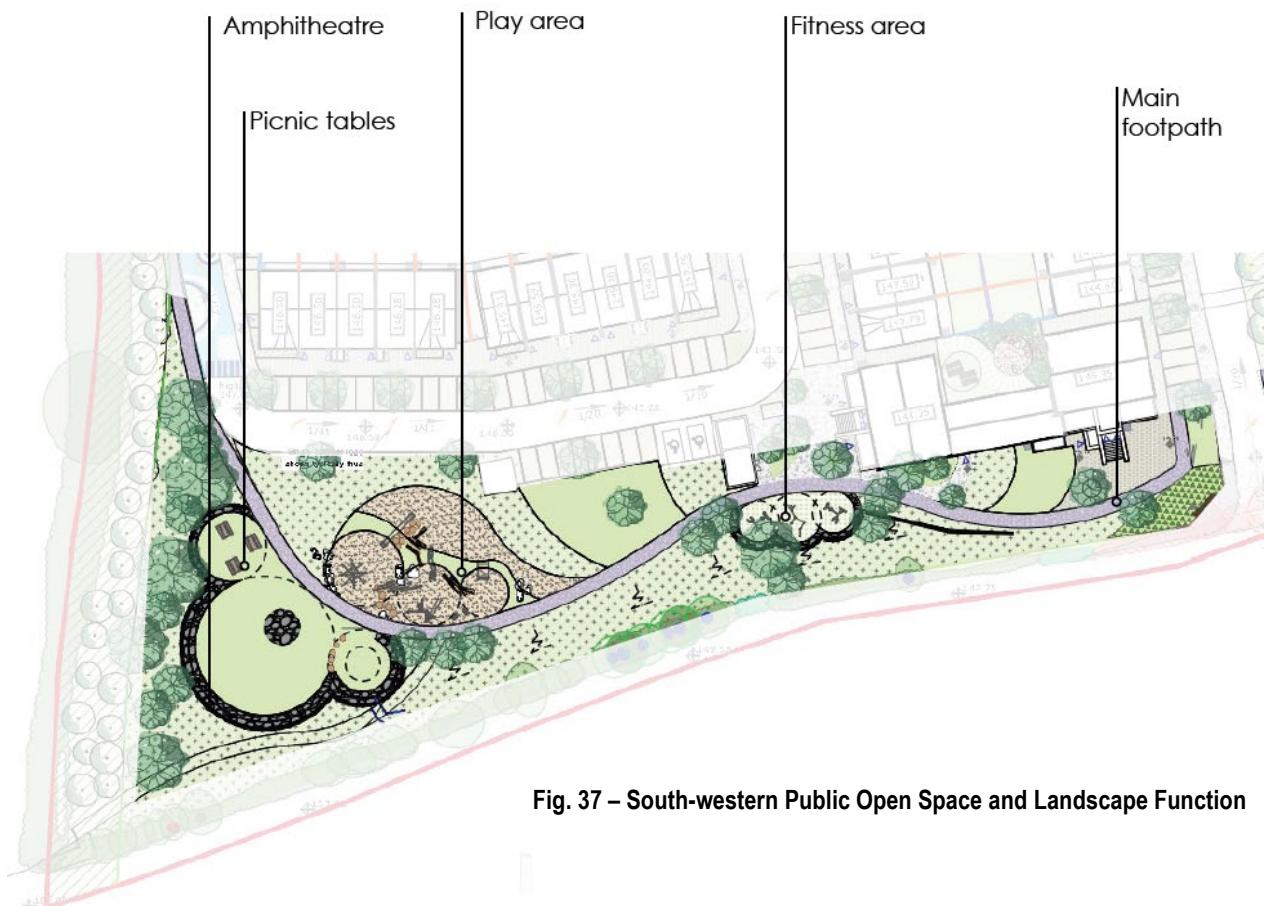


Fig. 37 – South-western Public Open Space and Landscape Function



Fig. 38 – South-eastern Public Open Space and Landscape Function

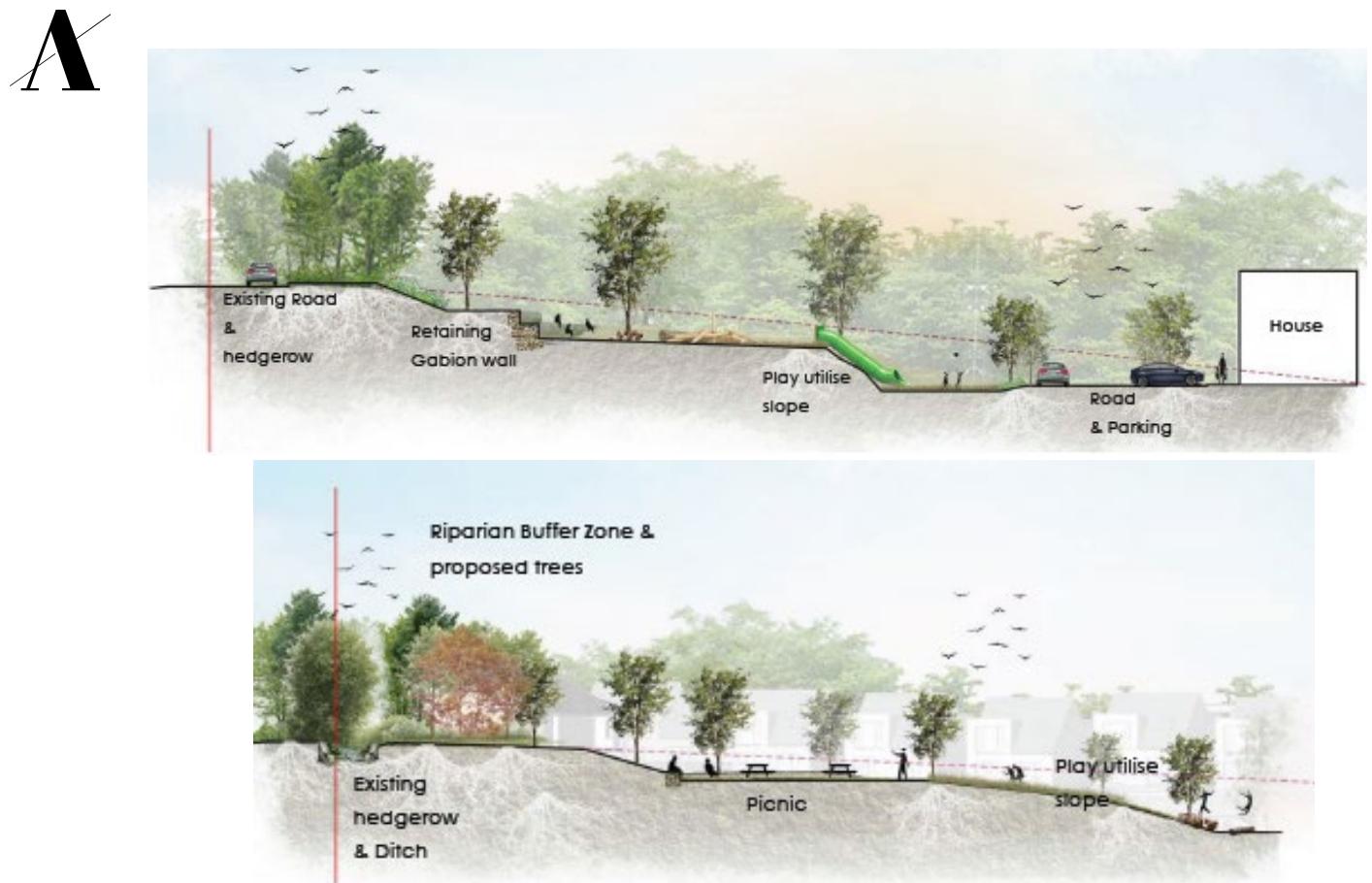


Fig. 39 – Sample sections through proposed Public Open Space No. 3

Public Open Space No. 4 – Active Linear Park / Southern part of site

These are two no. spaces outside of and adjacent to the riparian corridor along the eastern boundary of the site. The linear park provides a green corridor through the residential scheme while connecting different areas of the development. The design offers residents a clear route, access to nature, and access to activity nodes. The park features a route that runs north-south at the east of the site. The park utilises the beauty and ecology of the existing wooded area, by creating a seamless connection between the natural environment and spaces for public use.



Fig. 40 - Proposed Public Open Space No. 4

Public Open Space No. 5 – Natural Climb / North-western part of site

Located in the north-western part of the site, this zone featuring natural play equipment that utilises the site's topography. This offers a dynamic and engaging environment for children. It encourages physical activity, creativity and connection with nature. This area is also a "flood zone" and this has been accounted for in the proposed landscape design, having regard to the enclosed SSFRA. This space incorporates a sloped play area. We refer the reader to section 4.3 "Active Open Space" of the submitted Landscape Design Rationale report by Gannon & Associates Landscape Architects to see how this space works and to section 8 – 15 in the same document. Furthermore, we note from the pre-planning feedback received from the Planning Authority that they had concerns regarding the development of this north-western space as both public open space and a flood zone in terms of its impacts on the existing western boundary of the site. To that end, Gannon & Associates Landscape Architects have prepared three sections through this space illustrating the proposed landscape design and we refer the reader to the enclosed Landscape Design Rationale booklet for details on same.

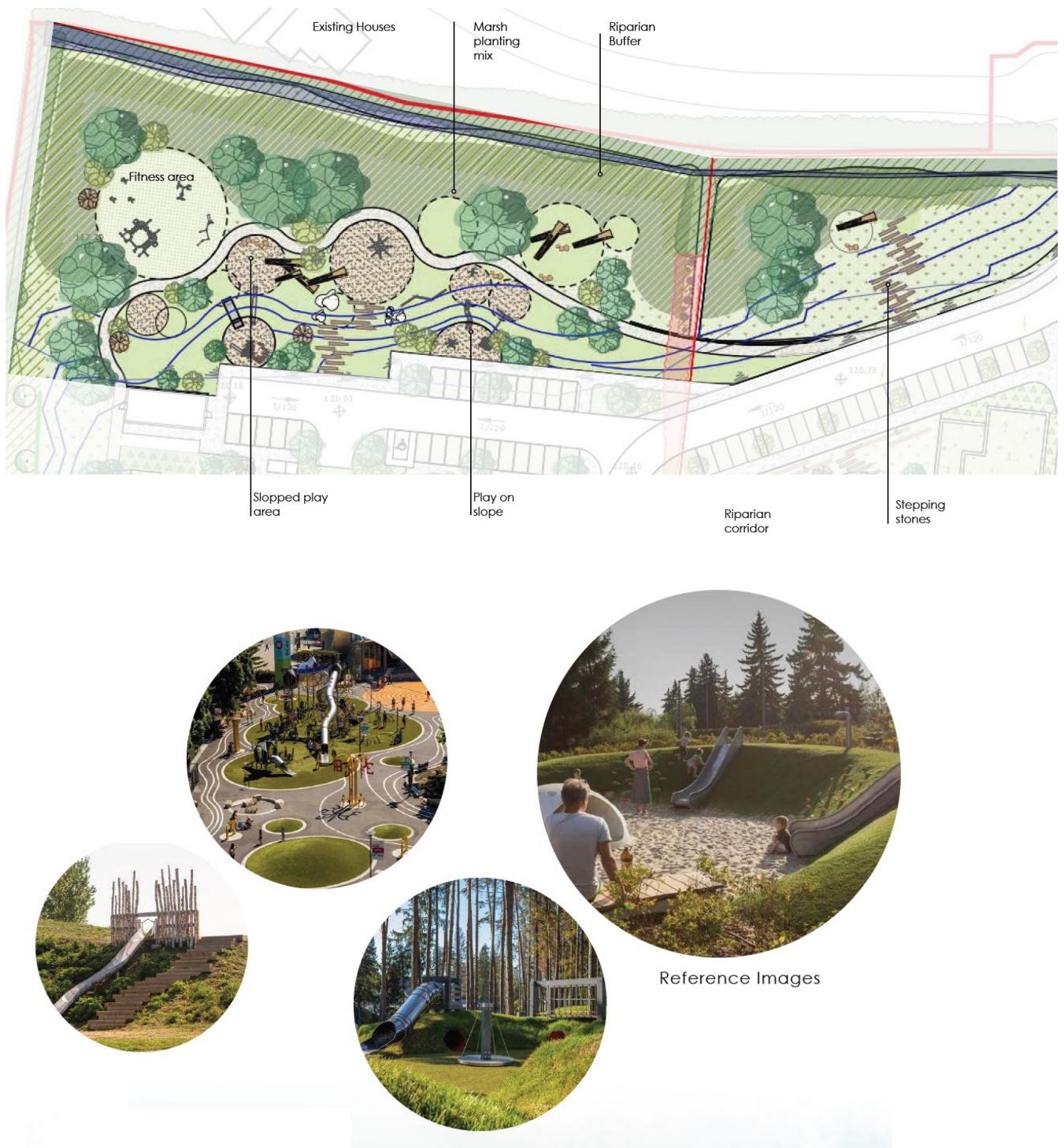


Fig. 41 – Proposed Public Open Space No. 5

This zone featuring natural play equipment that utilises the site's topography. This offers a dynamic and engaging environment for children. It encourages physical activity, creativity and connection with nature.

Public Open Space No. 6 – Playful Streets

The proposed landscape design incorporates 4 no. "Playful Streets" throughout the development as a way to enhance everyday movement with informal play and interaction. These streets combine functional elements such as pathways, tree pits, and safe crossings with opportunities for children to explore and engage with their surroundings. The layout encourages slower traffic, increases safety, and helps create a more welcoming and liveable neighbourhood environment.

The Playful Streets concept is inspired by the Dutch woonerf, which originated in the 1960s in response to safety concerns for pedestrians and children in residential areas. This led to a redesign of streets to be shared spaces for pedestrians, cyclists, and vehicles, reducing car dominance and promoting interaction. By the 1970s and 1980s, the woonerf model was formally integrated into Dutch traffic regulations, spreading across the Netherlands. However, in the 1990s, the focus shifted towards simpler, cost-effective designs with speed restrictions for residential streets. Despite this, the core idea of creating safe, interactive spaces for communities continues to influence urban design, including the concept of Playful Streets.

Playful Streets offer a simple, low-cost approach to transforming urban spaces into areas where children and residents can engage in outdoor activities. By limiting vehicle access during designated hours, streets become safer and more accessible for recreational use. This model encourages social interaction and physical activity, while fostering a sense of community.



Fig. 42 – Playful Street Concept



The playful streets incorporate the following:

- **Street Games:** Pavement markings for traditional games such as hopscotch and mazes, encouraging physical play and interaction among residents.
- **Urban Furniture:** Interactive seating arrangements, such as benches and tables, designed to enhance both comfort and social engagement.
- **Natural Elements:** Incorporating plants, trees, and sensory features into the environment to stimulate exploration and provide a more enjoyable atmosphere.
- **Traffic Reduction:** Restricting vehicle access during specific hours to reduce traffic and ensure the streets are safe for play.
- **Traditional Irish Street Games:** Reviving popular street games like skipping, tig, and kick the can, which have been part of Irish childhood play culture, to promote active play and community connection.

The overall landscape proposal seeks to create useable spaces for meaningful recreation whilst taking into account the specific factors of the subject site such as topography, ecological / riparian / biodiversity corridors/buffers, and flood risk. The overall landscape and surface water design strategy for the proposed development has gone through a significant redesign and the landscape proposal incorporates natural SUDS strategies to manage stormwater across the site, using techniques like permeable surfaces and green spaces to integrate water management seamlessly into the environment. This approach not only addresses ecological concerns but also encourages community interaction by ensuring that these systems are part of the public realm. Streets are designed as flexible, accessible spaces that promote community use, allowing residents to engage with their surroundings in a meaningful way. The design fosters both environmental sustainability and social interaction by blending functional water management with vibrant public spaces.

Judicious consideration has been paid to the ecological corridors on the subject site which have been carefully considered as part of the overall landscape design. The enclosed Landscape Design Rationale prepared by Gannon & Associates (section 5) outlines details of the sections through these spaces and the proposed corresponding landscaping – please refer to same.

Scott Cawley asserts firms in their Biodiversity (Chapter 5) of enclosed EIAR that a small area of marsh habitat occurs in the northeastern part of the site and that *“it is not practical to retain the marsh habitat in its current location owing to changes in the ground levels to address site accessibility requirements. Therefore, it is instead proposed to translocate the habitat (comprising approximately 0.05 ha) to another location within the proposed development site. The proposed translocation approach is based on a review of case studies and is considered to be a pragmatic and feasible solution in light of design constraints, and has been developed through a multidisciplinary iterative design approach with input from the design team’s engineers, hydrogeologist, landscape design team and ecologists. The area identified for habitat translocation and creation is to provide a greater area (0.13 ha) to that being permanently lost to the proposed development. A replacement ratio greater than one-to-one is used in this instance because of the uncertainty inherent in habitat compensation and translocation. This is detailed in the accompanying Marsh Translocation Report (Gannon & Associates, 2025)”*. Prior to works commencing, a detailed Ecology Site Management Plan specific to the contract programme will be prepared by a suitably qualified ecologist with reference to the construction programme.

The ecological importance of the identified marsh habitat is acknowledged as the submitted landscaping proposal includes the controlled and planned relocation of these habitats to a designated area within the site, ensuring that the essential ecological and hydrological characteristics are preserved. In addition, this LRD planning application is accompanied by a standalone “Marsh Translocation Report” which outlines the step-by-step process for translocation, including site selection criteria, soil and vegetation handling protocols, water management strategies, and post-



relocation monitoring plans. The report also details anticipated challenges and mitigation responses to reduce potential risks to biodiversity. Through this collaborative, science-led approach, the proposed LRD aims to deliver an environmentally responsible outcome that balances progress with preservation.

Scott Cawley affirms in their Biodiversity (Chapter 5) of enclosed EIAR that an area of marsh habitat within the site, identified by SDCC feedback as warranting further consideration given its relative scarcity in the wider environment, is based on survey results relatively species poor. A review of ortho-aerial photographs shows that it is not a long-established habitat, and there is no evidence that this habitat was present in the apparently well-maintained agricultural fields in 2015. It is believed that its presence arose owing to damage to land drains in the low-lying ground, and it is relatively small in extent. Nonetheless, this habitat is valued as being of local importance higher value, due to its limited extent in the broader landscape and its potential to develop into a more species rich habitat and supporting habitat to other species. The vegetation within this area of habitat grades into wet grassland, dominated by rushes, which is not uncommon of poorly managed agricultural sites.

The proposal includes the controlled and planned relocation of these habitats to a designated area within the site, ensuring that the ecological and hydrological characteristics are preserved. The new location was selected based on topographical and hydrological analyses, replicating the water retention conditions observed during the GI Investigation. This involves the creation of micro-habitats such as depressions and wet areas, supporting the natural development of wet grass species and maintaining the high water table. The relocated marsh area will be integrated as key elements of the landscape plan, promoting a design that enhances the habitat as both a visual and ecological asset. These areas will also function as green infrastructure, contributing to the sustainability of the development.

The translocation of the marsh habitat, combined with a strategic expansion to nearly double its original area. The receptor site will be 1,260m² and the donor site is 702m². This offers significant ecological net benefits. By increasing the spatial extent of the marsh, the project enhances the site's capacity to support a broader range of hydrophilic plant species, invertebrates, and wetland-dependent birds and amphibians.

A

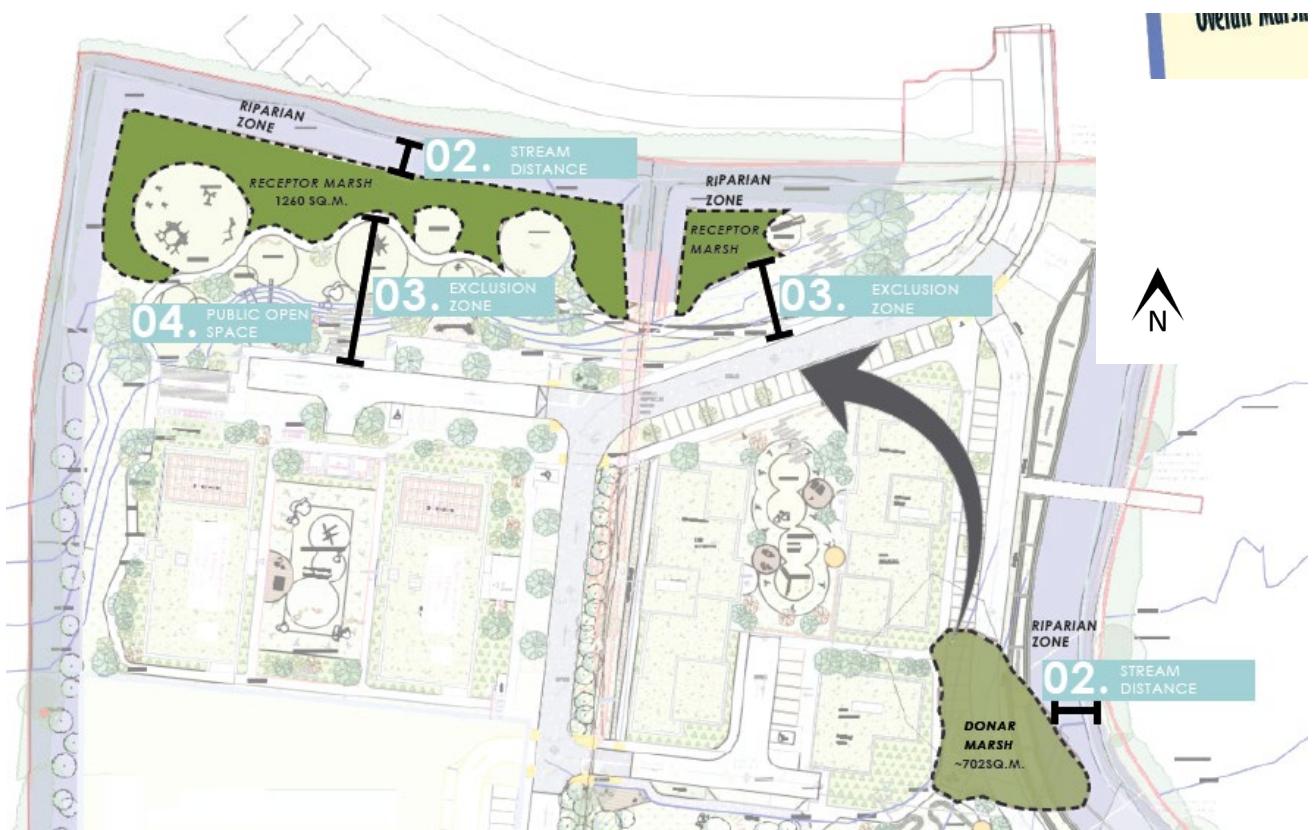


Fig. 43 – Proposed March Translocation from existing eastern location northwards to proposed areas of open space

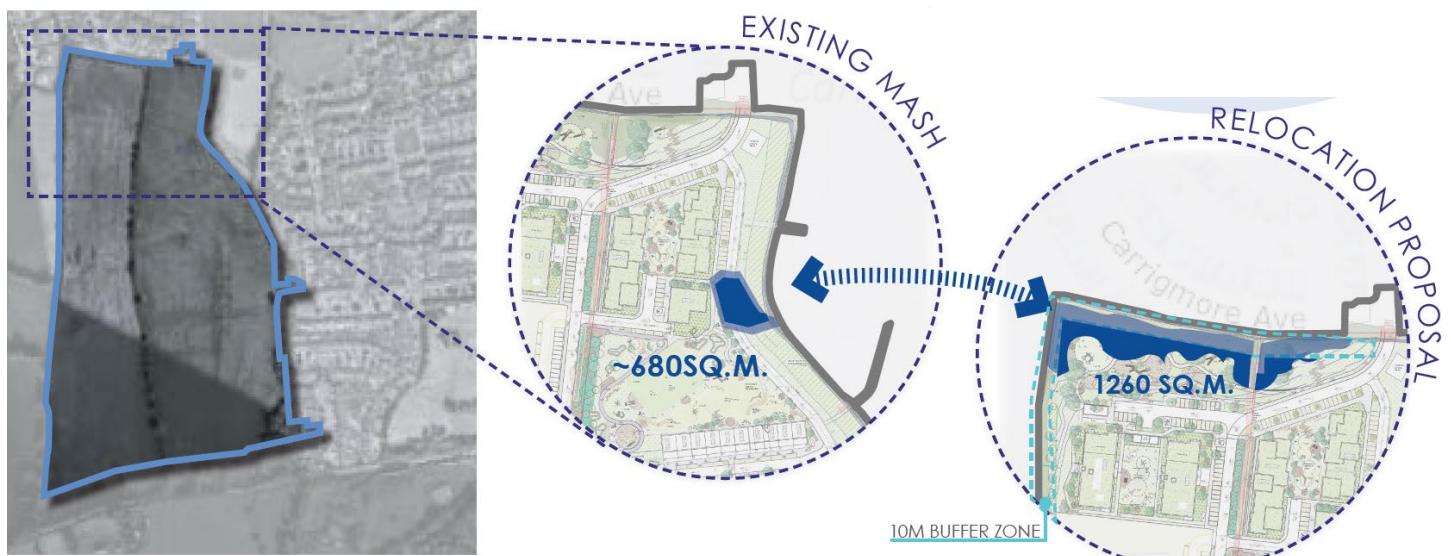


Fig. 44 – Proposed Landscape Detail re Marsh



In accordance with the Development Plan objective **GI3 Objective 3**: “*To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained / reinstated along all watercourses within any development site*”, the appropriate buffers are provided for along the eastern, western and central field boundaries. A minimum 10m buffer / no development zone is provided for along the eastern and western boundaries. Section 5.1 of the enclosed Landscape Design Rationale prepared by Gannon & Associates Landscape Architects provides details and sections of these ecological corridors and how they are to be maintained and landscaped – please refer to same. Fig. 45 overleaf illustrates the riparian / ecological buffers catered for on site.

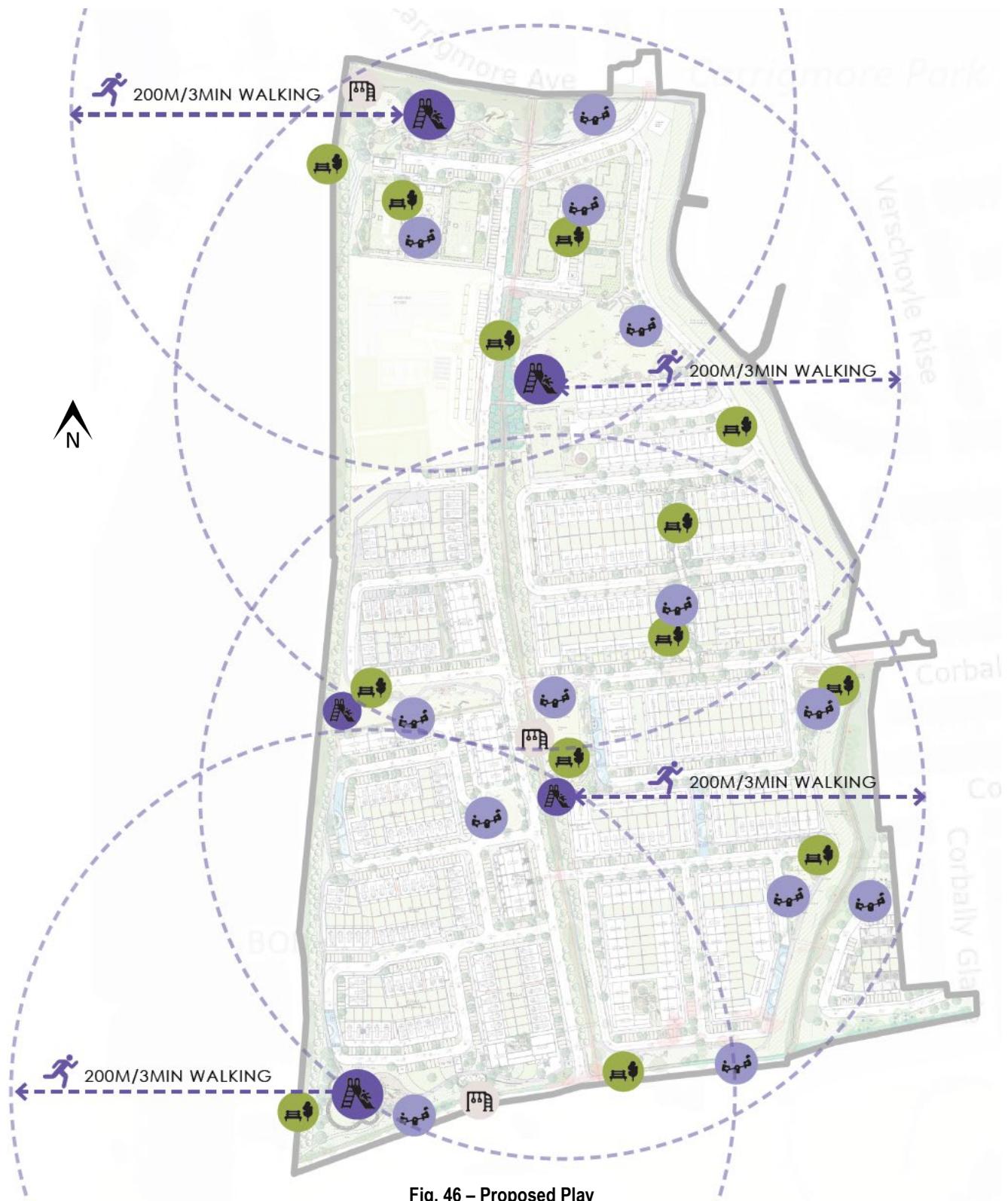
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Fig. 45 – Riparian / Ecological Buffer Zone Diagram

There is a variety of play provision catered for as part of the overall landscape design which includes:

- 16 no. equipped and natural play areas
- 10 no. picnic and relax areas
- 4 no. fitness play areas.





7.18.2 Communal Open Space Provision

In addition to the above detailed public open space provision, the proposed development also caters for the appropriate provision of communal open space. The communal open space provision is put forward in compliance with the minimum standards stated in Appendix 1 of the Apartment Guidelines. The Apartment Guidelines set out the following standards in relation to communal open space provision (per unit):

- One bedroom unit – 5 sq.m
- Two bedroom (three person unit) – 6 sq.m
- Two bedroom (four person unit) – 7 sq.m
- Three person unit – 9 sq.m

Based on the mix of apartments and duplex units proposed (with no studio units proposed), the development has the following requirement for communal open space:

Apartment / Duplex Type	No. of Units Proposed	Required Communal Open Space Per Unit (sq.m)	Total Communal Open Space Required (sq.m)
One Bed Unit	57	5	285
Two Bed (Three Person) Unit	1	6	6
Two Bed (Four Person) Unit	169	7	1,183
Three Bed Unit	78	9	702
Total	305	-	2,176m²

Table 21 - Communal Open Space Requirements.

As detailed in Table 22 above, the proposed development has a requirement for the provision of 2,176sq.m of communal open space. The proposed development puts forward a total provision of 4,750sq.m of communal open space and, therefore, complies with the above requirement.

The communal open space provision for the development is provided in 6 no. individual communal open space areas located adjacent to the proposed apartments and duplex blocks.

Fig. 47 overleaf provides an illustration of the differentiated open spaces on site and their location.



Fig. 47 – Proposed Open Space



7.18.3 Private Open Space Provision

Private open space associated with the residential units is provided in the form of rear gardens for proposed houses and ground floor terraces / upper floor balconies for proposed apartments and duplex units. The location and orientation of each private open space has been carefully considered to maximise use of space and receipt of sunlight and daylight throughout the day.

All private open space areas for the proposed apartments and duplex units have been designed to comply with the spatial requirements of Appendix 1 of the Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023), which are also replicated in Table 3.21 of the existing South Dublin CDP.

In relation to private open space areas for the proposed houses, we note the requirements of Table 3.20 of the existing South Dublin CDP which detail the spatial requirements for private open space associated with houses. In general, the proposed development complies with these stated standards and provides for generous gardens sizes; however, it should also be noted the proposed layout has also been designed with regard to the 2024 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.

SPPR 2 of the aforementioned guidelines sets out the minimum private open space standards for new houses as follows:

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

The proposed development caters for private open space (i.e. gardens) for the proposed houses which range in size from the smallest being c.39sq.m for a 2 bedroom house up to the largest being c.125sq., which complies with the minimum private open space standards stated in SPPR 2 of the Sustainable Residential Development and Compact Settlements Guidelines. As directed by the Compact Settlements Guidelines, the private open spaces associated with the proposed houses forms part of the curtilage of the house, is designed to a high standard, and is directly accessible from the principal living area of the house it serves.

Given the topography of the site, careful consideration has been paid to the design / landscape of the rear gardens of the houses and Gannon & Associates Landscape Architects have prepared a series of sections through the various housing cells to illustrate the functionality and useability of the rear garden spaces – please refer to the enclosed drawing no.s “Rear Gardens Sections Sheets 1 & 2” and the 5 no. “Rear Garden Cells 1-5” drawings for details.

We refer the reader to the submitted HQA which sets out the private open space afforded to each individual dwelling, and demonstrates the proposed LRD's compliance with the minimum private open space standards of the both the Sustainable Residential Development and Compact Settlements Guidelines, 2024, and, where applicable, the existing South Dublin CDP, and the Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities, 2023 – please refer to same for full details. Please also refer to the floor plans of the proposed apartments and duplex units for details of the private open space provision for each apartment / duplex units and urban duplex unit.



8.0 Water Services Infrastructure

Roger Mullarkey & Associates' Consulting Engineers have prepared the enclosed civil engineering proposals for the subject development – please refer to same. The following sets out a summary only of the proposed physical infrastructure – for full details – please refer to the drawings and details prepared by Roger Mullarkey & Associates' Consulting Engineers.

8.1 Foul Drainage

There is no foul water sewer located on the subject lands. Therefore, it is proposed to service the subject lands by providing a new gravity foul sewer across the SDCC park to the northeast of the site connecting into the existing Uisce Éireann foul infrastructure in Verschoyle Green. A Confirmation of Feasibility (CoF) was received (Ref. CDS24005491) from Uisce Éireann (hereafter “UÉ”) noting that the wastewater connection was “feasible subject to upgrades”. A copy of the UÉ confirmation letter can be viewed in Appendix 11.11 of the enclosed Drainage & Water Infrastructure Engineering Report - please refer to same. Due to the sloping topography of the subject lands, it is not feasible to drain the apartments on the northern c.20% of the site or potential future school site by gravity. Therefore, a foul water pumping station is proposed as part of this application to drain the above blocks from lower north-east corner of the site into the gravity sewer to be constructed connecting into Verschoyle Green to the east.

Extensive discussions were held with Uisce Éireann regarding build-over and crossings of the existing water infrastructure as part of previous planning applications on this site, whereby subsequently agreement was reached and confirmed by UÉ in the Statement of Design acceptance letter (Ref.CDS20004359) issued on 19/08/21. A copy of that UÉ design acceptance letter can be viewed in Appendix 11.11 of the enclosed Drainage & Water Infrastructure Report. More recently, a submission has been made to UÉ to update their review based on the current design, which is substantially similar to previous iterations, and subject to this issuing of a grant of permission for this proposed LRD, at connection application stage any further requirements of UÉ will be ascertained and agreed.

The foul water drainage system is to outfall by gravity into the existing UÉ infrastructure located to the east of the subject site at Verschoyle Green as was agreed with UÉ. It should also be noted that the in the south-east corner of the proposed development where 10 no. dwellings adjacent to Corbally Glade are proposed, these houses are proposed to be connected into the existing foul sewer in Corbally Rise. Please refer to the enclosed drawing no.s 1324D/408-411 and 421 for details of the proposed foul sewer infrastructure

The lower level, north end of the site (25% of the site) incorporates a pumping station to drain the apartments, houses and the possible future school site via a rising main into the outfalling gravity pipe. This has been agreed with Uisce Éireann. The proposed foul pumping station is to be in accordance with the Uisce Éireann Code of Practice for Wastewater Infrastructure – Part 5 – Pumping Stations, the details of which can be viewed on the enclosed drawing no.1324D/421. Please note that the foul pumping station is below ground and is proposed to have only 2 no. above ground kiosks visible as per the UÉ standard, an example of same is illustrated in section 9 of the enclosed Drainage & Water Infrastructure Report.

It should be noted that the proposed wastewater rising main will cross the existing water pipes and that the Applicants have engaged with Uisce Éireann regarding the required diversion agreements. It should also be noted that this was previously agreed with them on the previous SHD application under Ref. DIV25342 whereby 4 no. pipes were proposed to cross the watermains whereas the current proposal consists of 3 no. crossing points. A “Confirmation of Feasibility” letter (Ref DIV25342) letter has been obtained from the Diversions section of Uisce Éireann and is included in Appendix 11.11 of the enclosed Drainage & Water Infrastructure Engineering Report - please refer to same, which confirms that the build over/near and crossings of the existing water infrastructure “can be facilitated”. A submission of drawings was made and discussions were held with UÉ based on the current design and subject to a successful planning outcome, at connection application stage any further requirements of UÉ will be ascertained and agreed in advance of construction.



We note that UÉ has issued a Confirmation of Feasibility (CoF) (Ref. CDS24005491) noting that the wastewater connection was “feasible subject to upgrades”. We also note that the relevant letters of consent to making this application have been issued to the Applicants and are enclosed. As the necessary consents/approvals are included in this application, we also note the provisions of section 34(13) of the Planning and Development Act, 2000 (as amended) which states: “*A person shall not be entitled solely by reason of a permission under this section to carry out any development*”. The Applicants are fully aware of this provision in the Act, and we put it to the Planning Authority that this, along with all of the details included in this application for permission, as well as the size of the development proposal and the proposed phased delivery of same will not preclude the Planning Authority from issuing an order to grant permission for the proposed development.

8.2 Water Supply

A Pre-Connection Enquiry Form application (PCEA) was submitted to UÉ and a Confirmation of Feasibility (CoF) was received (Ref.CDS24005491) from UÉ noting that the water connection was “*feasible without infrastructure upgrade*”. A copy of the UÉ confirmation letter can be viewed in Appendix 11.11 of the enclosed Drainage & Water Infrastructure Engineering Report.

The proposed water supply for the development is to be made by connecting to an existing 400mm diameter main located in the Boherboy Road (L2008) to the south of the site. A single 225mm outside diameter connection has been approved by Uisce Éireann and will supply the proposed development via a 225mm outside diameter watermain with interconnecting 180mm and 110mm diameter looped branch watermains connected to it. Individual houses are to be supplied with a 25mm connection.

There are 3 no. existing watermains (4inch uPVC/400mmDI/600mmDI) in the Boherboy Road along the southern site frontage. This application proposes to make a new water connection to the 400mm DI watermain in the Boherboy Road. This has been agreed with Uisce Éireann.

There are 5No. existing trunk watermains crossing the applicant’s lands. A 1.2m Ø (1982 Concrete), a 27inch Ø (1938 Steel) and a 24inch (AC 1975) lie approximately parallel to each other in the northern third of the site and also a 1.2m Ø (1983 Concrete) and 24inch Ø (1952 Cast Iron) lie parallel approximately in the middle of the site. Please refer to drawing No.’s 1324D/310-312 for location of these existing trunk watermains. These trunk watermains are in the control of Uisce Éireann. The correct and surveyed location of each the existing watermains are as shown on the enclosed drawing no. 1324D/412-415. The set-back requirements from these mains is in accordance with the Uisce Éireann Code of Practice for Water Infrastructure document and extensive discussions were held with Uisce Éireann regarding build-over and crossings of the existing water infrastructure as part of previous planning applications on this site and subsequently agreement was reached and was confirmed by UÉ in the Statement of Design acceptance letter (Ref.CDS20004359) issued on 19/08/21. A copy of that UÉ design acceptance letter can be viewed in Appendix 11.11 of the enclosed Drainage & Water Infrastructure Engineering Report. More recently, a submission has been made to UÉ to update their review based on the current design, which is substantially similar to previous iterations, and subject to this issuing of a grant of permission for this proposed LRD, at connection application stage any further requirements of UÉ will be ascertained and agreed.

8.3 Surface Water

Compared to previous development proposals on the subject site, a significant redesign of the surface water proposals to serve this proposed LRD has been undertaken, based upon the feedback of SDCC in previous pre-planning consultations regarding the subject site. The proposed surface water drainage has taken into account the findings of the Site-Specific Flood Risk Assessment carried out and have been married with the proposed landscaping design and ecological requirements.



The surface water drainage infrastructure for the development will collect and treat the rainfall on the site and convey the runoff via roadside swales, tree pits, bio-retention areas, rain garden planters, open course conveyance swales, pipes, manholes, catchpit manholes and direct the flows via 9 no. open detention basins and 1 no. below ground attenuation system towards vortex flow restricting devices (Hydrobrake or similar) and petrol interceptors before outfalling to the existing on site open watercourses.

The vast majority of the application (c.99.5%) is located to the west of the Corbally Stream and the remaining c.0.5% (10 no. units) is located to the east of the stream, adjacent to Corbally Glade. Throughout the enclosed Drainage & Water Infrastructure Engineering Report the terms “*main site*” and “*Corbally site*” will be used to differentiate the separate sites where appropriate.

The main site has been sub-divided into 8 no. sub-catchments, while the Corbally site (catchment 9) is independent of the main catchment and drains to the Corbally Stream. As the main site contains an area (c.1Ha) set aside for a possible future school, it does not form part this planning application. However, a S/W outflow rate of 1.5l/s has been allocated to this part of the site. Please note that drawing no. 1324D/419 submitted with this application identifies each separate catchment and the associated area/flowrate/attenuation volume/etc. An allowance of an additional 20% for climate change has been applied as has an allowance for 10% urban creep to the rear gardens of the houses.

Only one underground attenuation tank is proposed with nine no. above ground, natural attenuation areas / detention basins proposed. The maximum top water levels in each of the 9 separate catchments is more than 500mm below the lowest floor level of any dwelling drained by that network. Full SuDS treatment train approach has been implemented. SuDS principles have been a key consideration in the scheme evolution.

Section 7 of the enclosed Drainage & Water Infrastructure Engineering Report provides details on the Sustainable Drainage Systems (SuDS) that are applied to the proposed development – please refer to same for details, but include the following:

The appropriate SuDS features included in this proposal include the following;

- Green Roofs for the flat roof areas of the apartment blocks and the roof of the creche
- Rain Garden planters to the rear down pipes of the houses
- Permeable paving to all private parking areas for drainage of roads and front roofs of the houses
- Filter Swales adjacent to roadways where feasible
- Tree pits where practically feasible
- Use of the existing centrally located Cooldown watercourse and hedgerow as a conveyance swale
- Bio-Retention areas draining roads/paths and roofs
- Silt-trap/catchpit manholes
- Hydrobrakes limiting flow to the total Qbar greenfield rate
- 9 no. open detention basins and 1 no. below ground retention storage system



Fig. 48 – Proposed SUDS Strategy



9.0 Flood Risk

9.1 A site-specific flood risk assessment (hereafter SSFRA) has been undertaken by Kilgallen & Partners, as referred to above, and is enclosed – please refer to the SSFRA for specific details of the flood risk assessment undertaken. The following is a synopsis of same only – for full details please refer to the submitted SSFRA.

9.2 The SSFRA was carried out in accordance with the document 'Planning System and Flood Risk Management – Guidelines for Planning Authorities 2009' (the Guidelines). In accordance with Section 28 Ministerial Guidelines, this document serves as the statutory method for assessing flood risk and justification testing for proposed developments in Ireland. The subject residential development passes the parameters set out in the Guidelines and is therefore deemed appropriate from a flood risk perspective. Furthermore, the enclosed SSFRA asserts that it has considered the effects of climate change which is guided by the climate change adaption plan published by OPW ('Flood Risk Management - Climate Change Sectoral Adaptation Plan' Sep 2019).

9.3 The enclosed SSFRA identified the various flood risk mechanisms that could affect the Site and searched for evidence of flood risk arising from each mechanism. This search was based on:

- interrogation of available datasets for evidence of flood risk arising;
- examination of relevant details of the proposed development;
- inspection of the site.

This process found evidence of flood risk at the Site from fluvial sources (i.e. from the overtopping of rivers and streams, in this case the Corbally Stream which flows along the eastern and northern perimeters of the Site). No evidence of flood risk at the Site was found for other flood risk mechanisms.

9.4 For a site affected by fluvial flood risk, there are the following concerns:

- development of that site might give rise to flood risk elsewhere.
- development of that site might be at risk of flooding;

9.5 Regarding the first concern, the proposed development was found to have the potential to displace fluvial floodplain storage, thereby increasing flood-risk elsewhere. To prevent this, the proposed development includes compensatory storage, designed in accordance with the Guidelines, to offset the displaced floodplain storage. Modelling of flood flows in the stream during extreme events found the proposed development will not increase peak water levels during extreme flood events and will not increase flood risk elsewhere.

9.6 Regarding the second concern, the finished levels of the proposed development that are considered to be water-vulnerable, i.e. buildings, roads, parking areas, footways cycleways and other paved areas were found to lie outside flood risk zones in the post-development scenario and so the proposed development is not considered to be at risk of flooding. The freeboard between the potential top water level of the 1% AEP flood event and the lowest proposed site road or floor level far exceeds the minimum recommended dimensions as set out in the Guidelines. Furthermore, the freeboard above the highest potential top water level and the vehicle/pedestrian access points into Carrigmore/Carrigmore Park is significantly greater than those recommended in the Guidelines and therefore, the enclosed SSFRA asserts that there will be no impact on the ability to enter/leave the site during the extreme 1% AEP event (i.e. 1 in 100 year event).

9.7 The assessment carried out by Kilgallen and Partners informed the design of the proposed development so as to avoid any potential of flooding. In addition, the layout of the open space to the northern end of the development has been designed to cater for potential extreme rainfall events and then revert to usable open space during normal weather conditions. The SSFRA included appropriate factors to allow for the potential impact of climate change.

9.8 The Flood Risk Management Guidelines require the appropriateness of proposals to develop lands at risk of flooding to be assessed using the Development Management Justification Test. Accordingly, the proposed development was subject to and was found to satisfy the various criteria of this test.

9.9 The author confirms that a site walkover was undertaken to allow a direct inspection of drainage features, and states that *“Fluvial drainage features are consistent with those shown on OS mapping, suggesting there have been no significant changes to the drainage regime in recent times”*.

9.10 Under the detailed assessment of the enclosed SSFRA, it is confirmed that the site is located in the catchment of a tributary stream of the Camac River. It is this stream (Corbally Stream) which flows along the eastern and northern boundary of the site. The stream enters the site at the southern boundary (i.e. from a culvert under the Boherboy Road), flows in a northerly direction along the eastern boundary, turns in a westerly direction upon meeting the northern boundary and discharges to a culvert at the north-western corner of the site. The outfall culvert comprises 4 no. 450mm dia. pipes in parallel.

9.11 Initial assessment of flood risk indicators (section 4 of the submitted SSFRA) suggests the site may be at risk from fluvial flooding during extreme rainfall events, and that the principal flood risk area is at the north-west corner of the site. The indicators also suggest a risk of shallow overland flow at the north-east corner of the site. Accordingly, a detailed assessment of fluvial flood risk was carried out. This detailed assessment confirmed that the site is affected by flood risk Zones A and B at its northern boundary.

9.12 The submitted SSFRA, and Section 5 of same, provides a detailed assessment of the fluvial flood risk. This section of the SSFRA identifies the pre-development flood risk zones on the site (Refer to Fig.s 5.1 & 5.2 of the SSFRA). Section 5.2 of the SSFRA outlines details of the proposed compensatory storage which is required where a proposed development encroaches into a flood-risk zone and it displaces floodplain storage thereby having the potential to increases flood-risk. Where such displacement occurs the proposed development must provide storage (i.e. Compensatory Storage) to offset the displaced floodplain storage.

9.13 The proposed development includes a basin at the north-west corner of the site which is designed to provide direct compensatory storage. The inclusion of this basin means that while the proposed development will impact on existing flood risk zones at some locations and thus displace floodplain storage, it reduces the ground level at other locations, thereby providing compensatory storage. Figure 5.3 in the submitted SSFRA (page 21) shows a typical section through the compensatory storage area, while further sections are shown in Appendix F of the SSFRA.

9.14 The requirements for providing compensatory storage are set out in the Appendix to the Flood Risk Management Guidelines, and the submitted SSSFRA states that the basic criterion for compensatory flood plain storage is that, calculated at elevation intervals of 100mm, the compensatory storage provided must not be less than the volume of floodplain storage displaced by the proposed development. To determine if this criterion was met, the volumes of flood plain storage available under the pre- and post-development scenarios was calculated for each 100mm interval between the lowest elevation of the site, 117.20m, and the peak flood level for the 0.1% AEP flood event, 118.17m (the Assessment Range). Table 5.1 of the enclosed SSFRA presents the results of this assessment and shows that for all elevation intervals between the lowest point of the site and the 0.1% AEP flood level, the volume of compensatory storage provided is greater than the volume of floodplain storage displaced in every interval bar one. Cumulatively the proposed development will increase floodplain storage by 688 cu.m and thus will slightly reduce flood risk elsewhere. The SSFRA assert that *“the proposed development therefore meets the requirements of the Flood Risk Management Guidelines for Compensatory Storage”*.

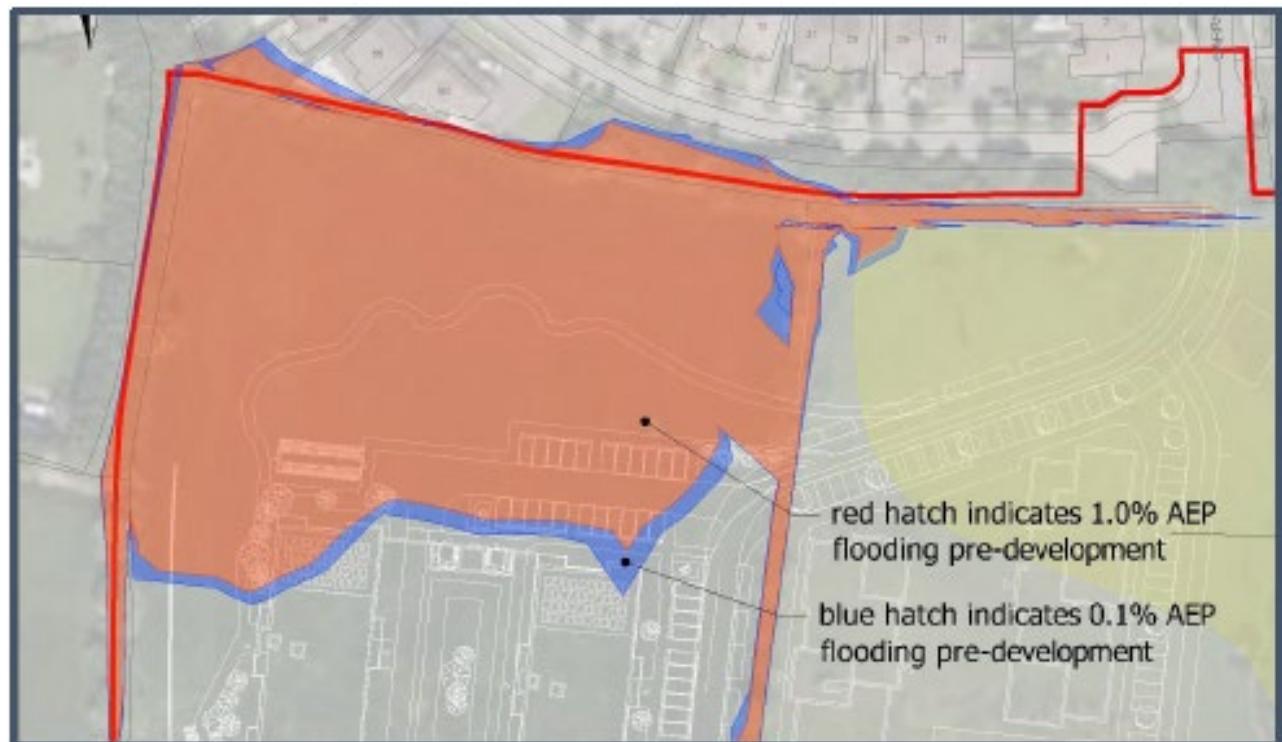


Fig. 49 – Figure 5.2 of submitted SSFRA – “Pre-development flood-risk zones established by hydraulic model at northwest boundary superimposed on proposed development”.

9.15 In terms of flood risk post development, the SSFRA states that post-development flood risk zones were established using the hydrological model described but using the finished levels of the proposed development rather than the existing ground levels. Figure 5.4 of the SSFRA (page 22) shows the extent of the post-development flood risk zone superimposed on the proposed development and also shows the outlines of pre-development flood risk zones.

9.16 Post-development peak water levels flood-risk zones are as follows:

- 1.0% AEP Flood Event 118.10m,
- 0.1% AEP Flood Event 118.16m .

The SSFRA asserts that the levels are significantly below the minimum proposed road and floor levels and that within the site the post-development flood risk zones occupy the compensatory storage basin and do not encroach on water-vulnerable areas of the proposed development. The proposed development increases available flood plain storage.

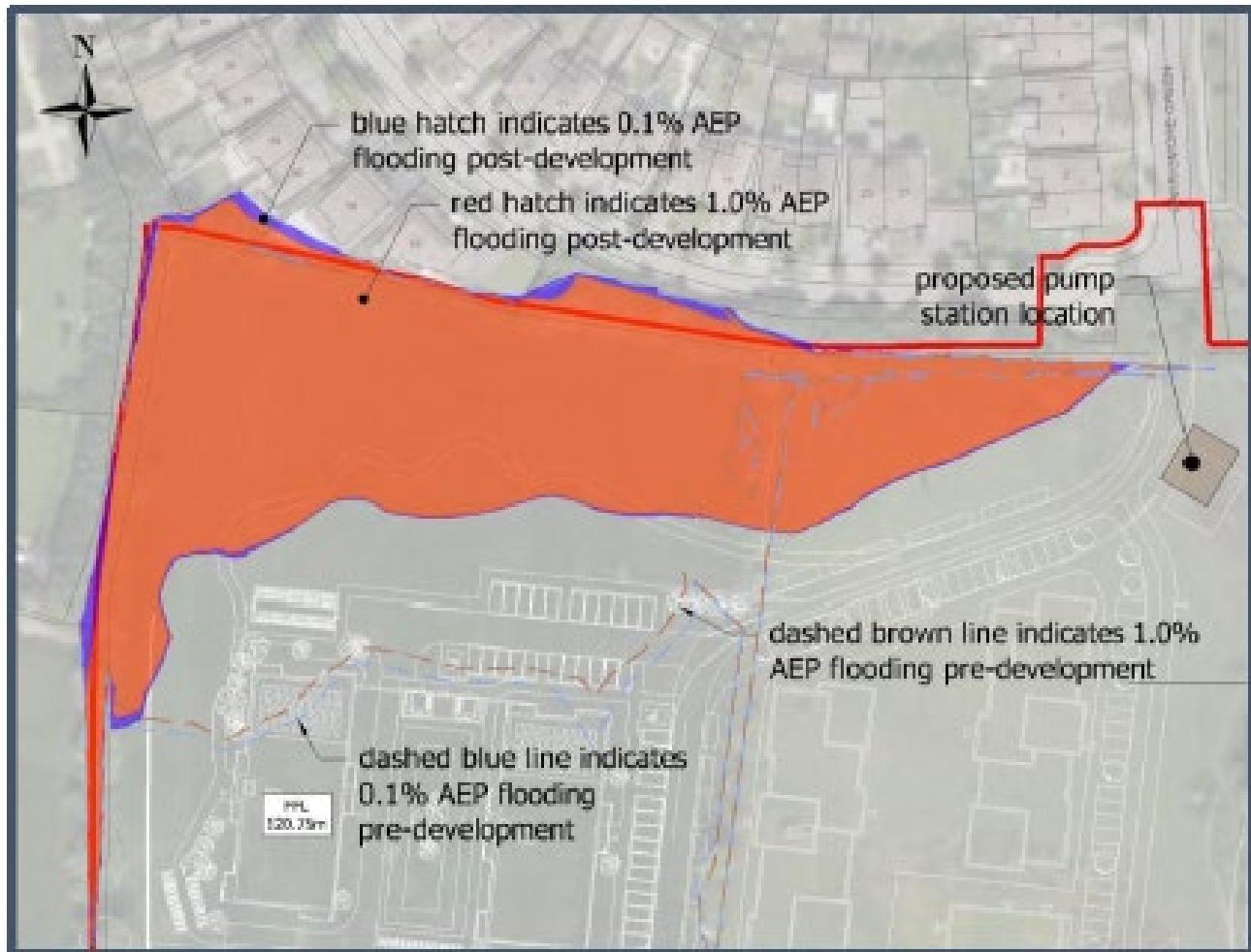


Fig. 50 - Figure 5.4 of submitted SSFRA – “Post-development flood-risk zones”.

9.17 Section 5.4 of the submitted SSFRA deals with the freeboard to stream channel and states that the stream was found to overtop its western bank at the northeast corner of the site, with the resulting overflow continuing downhill as sheet flow (i.e. shallow overland flow) and flowing back into the stream channel slightly further downstream. Further upstream, peak water levels were found to be close to the bank levels to the point where appropriate freeboard was not being provided. To provide this freeboard generally the finished level adjacent to the stream has been raised along the eastern boundary (as shown in Figure 5.5) to provide a minimum 750mm freeboard above the 1% AEP water level in the stream. This measure also eliminates the risk of overland flow at the north-east corner, ensuring that flow remains within the channel through this area. Sections showing the 1% AEP flow levels at the east boundary are provided in Figure 5-6 of the enclosed SSFRA (page 24). The proposed pump station location was within this overland flow area, with the proposed embankment that is no longer the case, and the proposed pump station location is protected by the embankment and is no longer within an overland flow area. The existing topography does not provide any storage for the sheet flow and so compensatory storage is not required.

9.18 In relation to the proposed stream crossings to provide access to Carrigmore to the north and Carrigmore Park (District Park) to the north-east, Section 5.5 of the submitted SSFRA has considered the flood risk associated with same, stating: “The proposed development includes five stream crossings at the locations shown on Figure 5.7. The crossings structures can be either bridge-type, comprising a simply supported slab across the stream, or a culvert. A preliminary design for each structure has been carried out in accordance with OPW requirements. The OPW requires design solution to convey the 1% AEP flood event with a minimum freeboard of 300mm between the top water level at the inlet and the soffit of the culvert. Table 5.2 shows the 1.0% AEP water level and minimum soffit level at each

crossing culvert. Soffit levels are at least 500mm above the 1% AEP level and so comfortably exceeds OPW requirements. Finished levels are thus more than 500mm above the 1% flood level and thus comply with the FRMG recommendations (Section 8). Figure 5.8 shows a typical section at a stream crossing. Two of the crossings are vehicular and crossing levels are constrained by the requirement to tie-in to existing road levels. OPW Section 50 consent have been obtained for these crossings; a copy of the consents is included in Appendix E.” of the submitted SSFRA.

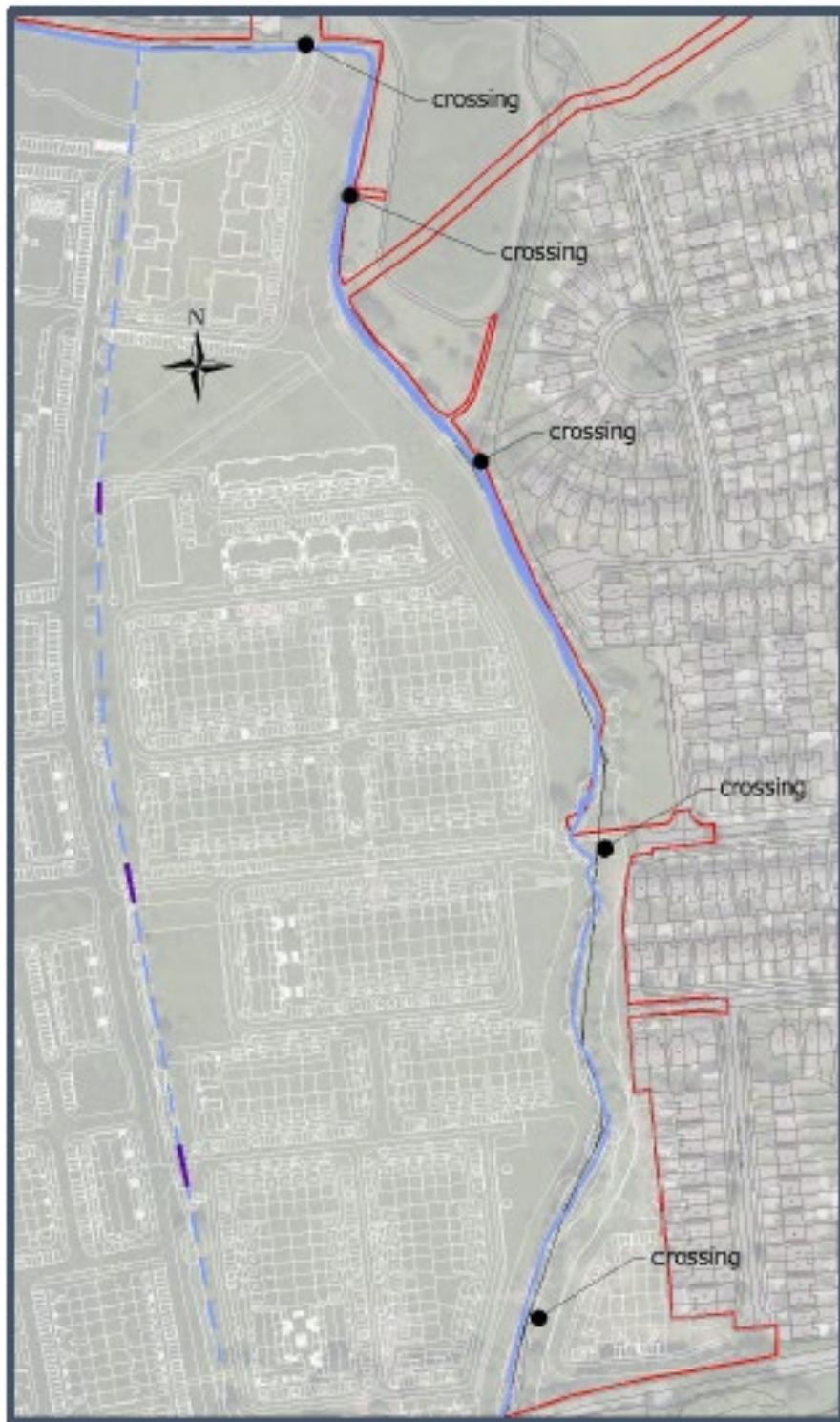


Fig. 51 - Figure 5.7 of submitted SSFRA – “Stream Crossings”.

9.19 Figure 5.8 in the SSFRA shows a typical section at a stream crossing. Two of the crossings are vehicular and crossing levels are constrained by the requirement to tie-in to existing road levels. OPW Section 50 consent have been obtained for these crossings; a copy of the consents is included in Appendix E of the submitted SSFRA – please refer to same.

9.20 Section 6 of the submitted SSFRA details flood risk from groundwater and confirms that no indicators of groundwater flood risk were observed during a site walkover and so further detailed assessment of flood risk from this mechanism is not required. Section 6 also states that “*There is an indication of flood risk from groundwater based on the shallow groundwater observed in the Hydrological and Hydrogeological Risk Assessment Report. However, the mitigation measures described in this report remove the potential flood risk from groundwater. The other indicators described above do not provide any indication of flood risk from groundwater and so further detailed assessment of flood risk from this mechanism is not required*”.

9.21 Section 7 of the submitted SSFRA details pluvial flood risk (i.e. rain water) and confirms that “*neither desktop indicators nor the site walkover revealed evidence of flood risk from pluvial sources and accordingly detailed assessment of this flooding mechanism is not required*”.

9.22 Section 8 of the submitted SSFRA deals with the finished floor levels of the proposed development and states that in order to ensure that elements of the development not compatible with water (i.e. roads and houses) are not at risk of flooding, “*it is recommended that proposed floor and road levels be raised above peak flood levels. The Flood Risk Management Guidelines recommend that floor levels be kept above the 1.0% AEP flood level with an appropriate allowance for freeboard. This SSFRA also recommends that road levels should be kept a minimum 250mm above the 100year flood level*

The maximum post-development 1% AEP water level in the basin at the north boundary is 118.10m. Accordingly, the minimum ground floor level for buildings adjacent to the Compensatory Storage Area should be 118.60m (i.e. 118.10m + 0.5m). Proposed buildings adjacent to the Compensatory Storage Area have a minimum floor level of 120.50m, 2.40m above the 1% AEP level.

Similarly, the minimum recommended road level immediately in the vicinity of the Compensatory Storage Area is 118.35m (i.e. 118.10m + 0.25m). The proposed road connecting to lands north has a minimum level of 120.00m, 1.90m above the 1% AEP level and 1.65m above the recommended minimum.

As described in Section 5.4, the finished level of the open space adjacent to the Corbally stream has been raised where required to provide a minimum 750mm freeboard above the 1% AEP water level in the stream.”.

9.23 In accordance with Section 5.15 of the FRG, the submitted SSFRA has carried out a Development Management Justification Test in respect of the proposed development, the details of which are set out in section 11 of the SSFRA, and Table 11.1 of same, presents the results of this test which conclude that the proposed development satisfies the criteria of the Justification test – please refer to same for further details.

9.24 The submitted SSFRA concludes (section 12) that the SSFRA was carried out in accordance with the document ‘Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)’. It also confirms that “*for an inland Site of this nature and for which there are no existing flood defence mechanisms that could affect flood risk at the Site, the potential flood risk mechanisms are Fluvial, Pluvial and Groundwater*”.

Initial assessment of existing flood risk indicators indicate the Site is not at risk from either Pluvial or Groundwater flooding.

Initial assessment of flood risk indicators suggest the Site could be at risk from Fluvial Flooding. Accordingly, a detailed assessment of fluvial flood risk was carried out. This detailed assessment confirmed that the Site is affected by flood risk zones A & B at its northern boundary.

The proposed development includes a basin at the northwest corner of the Site which is designed to provide direct compensatory storage. The inclusion of this basin means that while the proposed development will impact on existing flood risk zones at some locations (Section 5.1) and thus displace floodplain storage, it reduces the ground level at other locations, thereby providing compensatory storage. Cumulatively, more floodplain storage will be available upon completion of the proposed development than is currently available, leading to a slight reduction on flood risk elsewhere, in the areas immediately surrounding the Site.

The proposed development includes stream crossings at the locations shown on Figure 5.7. A preliminary design for each structure has been carried out in accordance with OPW requirements. Soffit levels are at least 500mm above the 1% AEP level at all crossings and so comfortably exceed OPW requirements. Two of the crossings are vehicular and crossing levels are constrained by the requirement to tie-in to existing road levels. OPW Section 50 consent have been obtained for these crossings; a copy of the consents is included in Appendix E.

The Flood Risk Management Guidelines recommend that floor levels be kept above the 1.0% AEP flood level with an appropriate allowance for freeboard, typically 0.5m. The maximum post-development 1% AEP water level in the basin at the north boundary is 118.10m. The minimum proposed floor level is 120.50m, 2.40m above the 1% AEP level and 1.90m above the recommended minimum. This SSFRA also recommends that road levels should be kept a minimum 250mm above the 100year flood level. The minimum proposed road level is 120.00m, 1.90m above the 1% AEP level and 1.65m above the recommended minimum.

As described in Section 5.4, the finished level of the open space adjacent to the Corbally stream has been raised where required to provide a minimum 750mm freeboard above the 1% AEP water level in the stream.

The proposed development was subject to and passed the Development Management Justification Test.

The proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is therefore appropriate from a flood risk perspective”.

9.25 It should also be noted that a similar SSFRA and compensatory measures were proposed in the SSFRA submitted with the previous SHD planning application on the subject site (Ref. ABP-313145-22), and we note that the Planning Authority indicated no objection in respect of surface water and flood risk, subject to conditions. In her assessment of that SHD, we note that the An Bord Pleanála Inspector stated that “*I am satisfied that the layout of the development is broadly cognisant of fluvial flood risk, however, elements of the proposed development at the northern boundary encroach on the flood risk zones, which creates the potential for the proposed development to displace floodplain storage and thereby increase flood risk elsewhere. In order to prevent this, the development includes compensatory storage within the site, which is in accordance with the Flood Risk Management Guidelines (FRMG). The SFRA considers that the compensatory storage exceeds the potential floodplain storage being displaced and so the proposed development will lead to a slight reduction in flood risk elsewhere*”. She concluded: “*The report from the Environmental Services Department has no objection in respect of Flood Risk subject to conditions. I am generally satisfied that the with the details of the SFRA, and subject to condition the development will not result in a flood risk*”.

9.26 Taking all of the foregoing into consideration, it is respectfully put forward that the submitted SSFRA undertaken for the current development proposal confirms that the proposed development is appropriate from a flood risk perspective. The submitted SSFRA is similar to that accepted in the most recent SHD planning application and it is therefore put forward that this also addresses the previous concerns in relation to flooding on the subject site.



10.0. Other Services Infrastructure

10.1 There are no impediments to connections to existing natural gas and broadband services infrastructure in the area. We refer the reader to the enclosed Utility Report prepared by ENX for details of the utility providers for the subject site.

10.2 It should be noted that there are existing overhead electricity ESB wires (38KV) traversing the site in three locations, in an east-west direction. As part of the proposed development, these overhead power lines will be retained and routed underground. We refer the reader to the enclosed Utility Report prepared by ENX and their enclosed drawing no. 3357-ENX-XXXX-XX-DR-E01-006004 "Site - Services Layouts – Electrical ESB Layout" which illustrates the existing and proposed routes of the power lines.

10.3 The enclosed Utility Report confirms that an application has been formally submitted to ESB to divert the overhead lines on the site. It is envisaged that new electricity ducting will tie into an existing MV circuits on neighbouring sites to service the new development. It is anticipated that three new plinth mounted ESB unit substations will be sufficient to service the proposed developments electricity demands. The ESB unit substations in turn will serve a network of mini-pillars and underground vaults strategically located around the development within footpaths where possible. Individual meters which will be housed in cabinets located on end gable walls of dwelling houses & duplexes where space permits, or on nib walls in terrace dwelling scenarios, will be fed from the mini-pillars. Apartments will have centralised metering housed within dedicated electrical cupboards located internally within the common area of each block, also served by the mini-pillar infrastructure. The enclosed Utility Report (section 2.1) provides details of the proposed cable diversion requirements.

11.0 Phasing

It is likely that the proposed development will be completed in three phases:

Phase 1: will commence at the southern end of the site delivering:

- (i) the vehicular access from Boherboy Road;
- (ii) areas of open space i.e. areas numbered POS 01, POS 02, POS 07, POS 08, POS 09, POS 10, POS 11 and POS 12, totalling c. 1.1Ha.
- (iii) pumping station and associated site development works, including north-south central avenue and associated flood relief works,
- (iv) the delivery of the connections to Carrigmore Park to the northwest, all along the eastern boundary of the site;
- (v) the delivery of the vehicular connection to Carrigmore to the north, Corbally to the east and the access to serve the proposed 10 houses in the south-eastern corner of the site; and
- (vi) approximately 277 no. dwellings.

Phase 2: will consist of the developing the middle sector of the development, (between the two watermain wayleaves). This will provide for:

- (i) 188 no. dwellings,
- (ii) associated open spaces i.e. areas numbered POS 04, POS 05, POS 06, totalling c. 6,975sq.m.

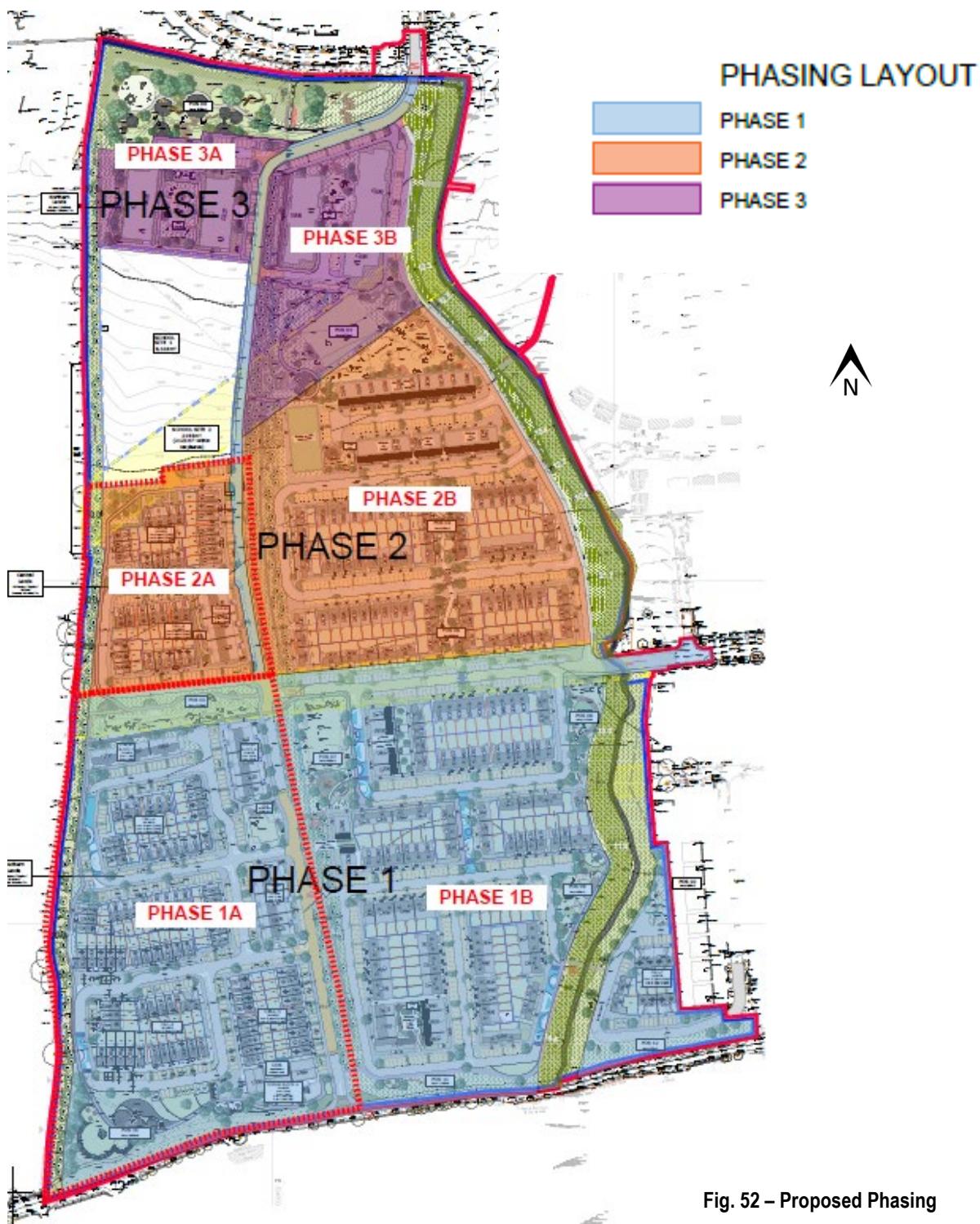
Phase 3: will be the final phase and will deliver:

- (i) the 146 no. apartments in Blocks A, B, B1 and C1;
- (ii) crèche and

(iii) adjoining open space i.e. POS 03 (3,801sq.m).

Please refer to the submitted site layout plan illustrating the proposed phasing "Site Plan Phasing" which illustrates the phasing of the overall development. Please note that as there are two no. applicants, the phasing illustrated on the aforementioned submitted phasing drawing in terms of "A" and "B" represents the ownerships / landholdings of Evara and Kelland respectively.

Note: the embankment works proposed on the north-eastern corner of the site, are proposed to be constructed prior to occupation of the adjacent buildings/roads and can be constructed concurrently with any adjacent development.



12.0 Casement Aerodrome, Baldonnell

For clarity in terms of designations and the site location, with regard to Map 12 of the South Dublin County Development Plan 2022 – 2028, the site is located outside:

- Approach surfaces
- Noise significant area
- Inner and outer public safety zone

But inside:

- An area identified as 'an area of significance for any development' in terms of 'general height guidance'.

The subject site is located c. 2.5km south-east of Casement/Baldonnell Aerodrome.

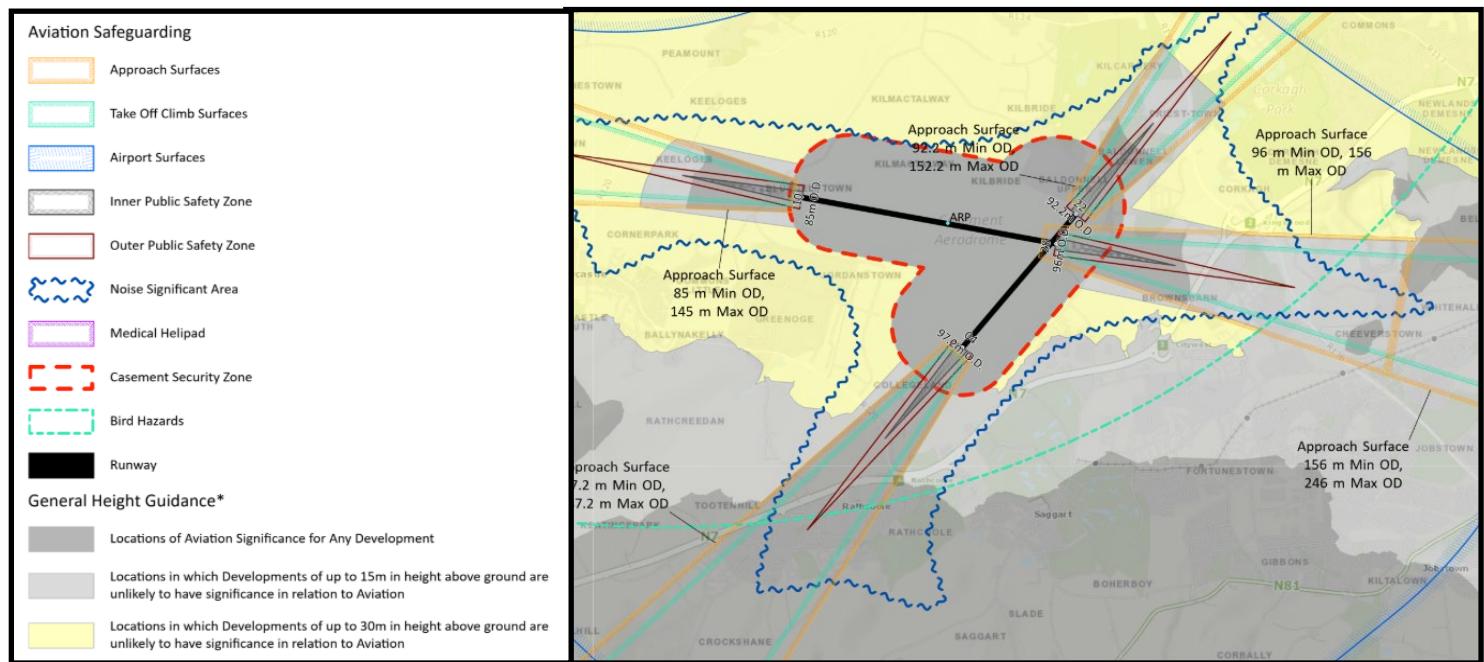


Fig. 53 – Extract from Map 12 of the South Dublin County Development Plan 2022 - 2028

Section 11.8.2 of the South Dublin County Development Plan 2022 – 2028 includes policies and objectives relating to Casement Aerodrome, including development in the vicinity of Casement Aerodrome.

Policy IE9 relates to 'Casement Aerodrome' and is to "Safeguard, having regard to the requirements of the Department of Defence, the current and future operational, safety and technical requirements of Casement Aerodrome and facilitate its ongoing development for military and ancillary uses".

E9 Objective 1 is "To ensure the safety of military and other air traffic, present and future, to and from Casement Aerodrome with full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities"

IE9 Objective 2 is "To maintain the airspace around Casement aerodrome free from obstacles to facilitate aircraft operations to be conducted safely, as identified in the Development Plan Index map and Map 12 and as outlined in Chapter 12: Implementation and Monitoring".



IE9 Objective 3 is “To implement the principles of shielding in assessing proposed development in the vicinity of Aerodromes, having regard to Section 3.23 of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces (2015) (See Chapter 12: Implementation and Monitoring)”.

IE9 Objective 4 is “To prohibit and restrict development in the environs of Casement aerodrome, where it may cause a safety hazard. (See also Policy IE13 Public Safety Zones and Chapter 12: Implementation and Monitoring)”.

Section 12.11.5 of the County Development Plan relates to ‘Aviation, Airports and Aerodromes’. It is stated that development beneath the elevation ordnance datum (OD) of the lowest applicable obstacle limitation surface – including graded heights of development below Approach and Take-off Surfaces – may be permitted, subject to demonstration that the development would not adversely affect, or be an obstacle to, aviation.

The onus is placed on the Planning Authority to consult with the Department of Defence (DoD) and the Irish Aviation Authority (IAA), as relevant, in this assessment. For development close to an aerodrome, or under an Approach or Take-off Surface, or on elevated ground under an Inner Horizontal Surface, the Planning Authority will require the applicant to submit a longitudinal section through the relevant ‘Obstacle Limitation Surface’.

It is noted that heights in the previous SHD application are similar to heights in the proposed LRD application, both reaching a maximum of 5 storeys.

The Department of Defence responded on 5th May 2021 to pre-application engagement on the previous SHD application making the following observations:

“Following consultation with Air Corps, the Department of Defence has the following observations at this juncture:

1. *Given the proximity to Casement Aerodrome, operation of cranes should be coordinated with Air Corps Air Traffic Services, no later than 28 days before use, contactable at airspaceandobstacles@defenceforces.ie or 01-4037681.*
2. *Given the proximity to Casement Aerodrome this area may be subject to a high level of noise from aircraft operating in the vicinity of the aerodrome.*
3. *Given the proximity of the development to Casement Aerodrome, should negative effects become apparent on air or ATC operations as a result of the photovoltaic cells, then the owner must take measures necessary to mitigate these effects to an acceptable level, without delay.*
4. *Due to the proximity to Casement Aerodrome, mitigations may be required in relation to the management of wildlife attracted to attenuation ponds or other water features. Should negative effects of bird activity on Irish Air Corps operations arise, the owner must put measures in place to mitigate these effects to an acceptable level.*

Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code”.

The County Development Plan, at Chapter 12, also includes the concept of ‘Public Safety Zones’. The prohibition on new development in the immediate vicinity of runway thresholds is transferred to new Inner Public Safety Zones for Casement and Weston. Pending more detailed review and recalculation based on updated traffic figures, these Inner Public Safety Zones will all be of triangular shape 1,000m long by 100m wide. As set out previously, the site is outside of the identified public safety zones.



Section 11.8.6 of the County Development Plan relates to 'Airport and Aerodrome – Noise'. The areas within which aircraft noise may be significant in the vicinity of the airports and aerodromes is indicated on the Development Plan Maps. The site is located outside of such designations.

Having regard to all of the above, it is considered that the proposed development would not have any negative impact on operations at Casement Aerodrome.

13.0 Statement of Effects on the Environment and European Sites

13.1 Environmental Impact Assessment

An Environmental Impact Assessment Report (EIAR) is required for the proposed development as this LRD proposal is comprised of 611 no. dwellings, with associated crèche and all associated site development works. Therefore, the proposal exceeds the threshold of 500 dwelling units included in Schedule 5 Part 2(10)(b)(i) of the Planning and Development Regulations 2001 (as amended) which sets out the relevant thresholds which require the carrying out of an EIAR. The subject development falls within the threshold of Category 10 (b)(i) as it comprises the "*construction of more than 500 dwelling units*", and as such we refer the reader to the submitted EIAR prepared by DNV, which is comprised of 3 no. volumes – Volume I being the Non-Technical Summary, Volume II, being the main EIAR and Volume III containing the Appendices.

The EIAR has been prepared in accordance with Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment as adopted on 16th April 2014 as an amendment of Directive 2011/92/EU.

As required, the public notices for the development have detailed that an EIAR has been prepared as part of the application and that the EIAR is available for inspection and/or purchase from offices of South Dublin County Council. The EIAR has also been uploaded to national EIAR portal – a confirmation notice of same is enclosed with this LRD planning application. Furthermore, the EIAR is available to view on the dedicated application website set up by the applicant at www.boherboylrd.ie.

The EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate. For full details please refer to the EIAR which accompanies the application.

13.2 Appropriate Assessment

An Appropriate Assessment (AA) Screening Report has been prepared by Scott Cawley Consulting Ecologists for the proposed LRD on the subject site and is enclosed as a separate standalone document to which we refer the reader for full details.

The enclosed AA Screening Report has assessed the impact of the proposed development on the following Qualifying Interest (QI) habitats and/or the QI/Special Conservation Interest (SCI) species of a European site(s):

- Glenasmole Valley SAC (001209),
- Wicklow Mountains SAC (002122),



- Wicklow Mountains SPA (004040),
- Rye Water Valley/Carton SAC (001398),
- Red Bog, Kildare SAC (000397),
- Poulaphouca Reservoir SPA (004063),
- South Dublin Bay SAC (000210),
- South Dublin Bay and River Tolka Estuary SPA (004024),
- North Bull Island SPA (004006),
- North Dublin Bay SAC (000206),
- North-west Irish Sea SPA (004236),
- Rockabill to Dalkey Islands SAC (003000),
- Baldoyle Bay SPA (004016),
- Malahide Estuary SPA (004025),
- Rogerstown Estuary SPA (004015).

The submitted AA Screening Report concludes that “*Following an examination, analysis and evaluation of the best available information, and applying the precautionary principle, it can be concluded that the possibility of any significant effects on any European sites, whether arising from the project alone or in combination with other plans and projects, can be excluded*” and that “*In reaching this conclusion, the nature of the project and its potential relationship with all European sites within the zone of influence, and their conservation objectives, have been fully considered. Therefore, it is the professional opinion of the authors of this report that the application for consent for the proposed development does not require an Appropriate Assessment or the preparation of a Natura Impact Statement (NIS)*” [our emphasis added].



14.0 Conclusion

14.1 Kelland Homes Ltd and Evara Developments Ltd. wish to apply to South Dublin County Council for permission for a Large-scale Residential Development (LRD) on a site located in the townland of Boherboy, Saggart, County Dublin.

14.2 The proposed development falls under the definition of Large-scale Residential Development (LRD) as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 as it consists of “*the development 100 or more houses*” the floor space of which “*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*”.

14.3 The residential element of the proposed development consists of 611 no. dwellings comprised of 306 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached & terraced houses, 131 no. 1, 2 & 3 bed duplex units in 12 no. 3 storey blocks, and 172 no. 1, 2 & 3 bed apartments in 5 no. buildings ranging in height from 4-5 & 5 storeys. The proposed development also includes a 2-storey crèche (c.630m²).

14.4 The proposed development is put forward in compliance with the Res-N land use zoning objective attached to the site, under the South Dublin County Development Plan, 2022-2028. All of the proposed dwellings are put forward in compliance with the floor areas standards for

- (i) new housing, as per the 2007 Quality Housing for Sustainable Communities Guidelines, and
- (ii) apartment developments as per the SPPRs of the 2023 Sustainable Urban Housing: Design Standards for New Apartments ensuring a high-quality development and standard of living for future residents.

14.5 Furthermore, the proposed development accords with new guidance set out in the “Sustainable Residential Development and Compact Settlements Guidelines” (DHLGH, 2024). The proposed development achieves a net density of c.50 units per hectare in accordance with the aforementioned guidelines.

14.6 Careful consideration has been given to the design of the proposed development to ensure integration with its environs, which is evident by the scale and building heights proposed, and the number of linkages to adjoining lands. The proposed site layout plan is also based upon the principles of DMURS and good urban design principles.

14.7 The enclosed Architectural Design Statement clearly demonstrates how the key criteria such as context, connections, inclusivity, variety and distinctiveness are catered for in the proposed development. It is also evident from the submitted Landscape Design Rationale and drawings, that the design aims to create a seamless and intuitive environment, allowing visitors to explore the landscape effortlessly. Within the design, open spaces are strategically incorporated, including areas for play, fitness, playful streets, climbing, seating etc. Judicious consideration has been paid to the preservation of existing vegetation and creating spaces that promote and support local biodiversity. The landscape design has incorporated SUDS proposals and enhances the green infrastructure network of the area.



14.8 The site is subject to a number of factors / constraints such as wayleaves, topography, flood zones, retention of hedgerows, and the need to cater for an aesthetically pleasing, medium to high density development in an outer suburban location, that demonstrates high quality urban design. It is a steeply sloping site, with site levels ranging from 155mOD in the south-west corner to 117.5mOD in the north-west corner, a difference of c. 37 metres across its length. The topography therefore creates considerable topographical challenges for laying out an accessible and visually pleasing residential scheme.

14.9 There is a good mix of dwelling types, building height, variation in design and character areas, with five character areas created, to establish a sense of place throughout the scheme. Good street frontage is proposed so as to create a strong urban edge along same. The enclosed landscaping details clearly demonstrate how the topography of the site is to be handled in an appropriate and soft manner.

14.10 The site layout plan provides for public open space provision in a variety of formats and recreational functions, and all open spaces will be passively overlooked, cater for a range of recreation types and pedestrian and cyclist connectivity, along with linkages to adjoining lands. A very clear green infrastructure strategy is applied to the proposed development, as per the enclosed Landscape Design Rationale. A significant proportion of the existing hedgerows are to be retained and have been incorporated into the site layout plan whilst, also adding to place making / neighbourhood zones within the scheme. The proposed development has gone through a lengthy pre-planning process with significant ecological surveys having been undertaken and all of the landscaping, flood risk assessment, proposed surface water drainage and ecological factors on the site carefully coordinated to produce a housing layout that marries good urban design with an efficient density and protection of biodiversity on site.

14.11 It is considered that the subject proposal for a proposed Large-scale Residential Development represents proper planning and sustainable development of the subject site and supports the objectives national, regional and local planning policy.

14.12 The purpose of this Planning Statement is to provide details of the development proposal and is accompanied by a suite of other reports such as a Statement of Consistency, EIAR etc. and we refer the reader to all of the submitted drawings and documentation in their assessment of this proposed LRD. Based upon feedback already received from SDCC, at both the S.247 pre-planning consultation and Stage 2 LRD meetings, as well as the information set out in the SDCC LRD Opinion, Ref. LRDOP003/25, dated 17th June 2025, the current proposal has evolved and is now put forward for permission.

14.13 Having regard to the policies and objectives in the 2022-2028 South Dublin County Development Plan, along with guidance set out in the following:

- Delivering Homes, Building Communities 2025-2030, (2025),
- the Revised National Planning Framework (2025),
- the Design Manual for Urban Roads and Streets (DMURS) (2019),
- the Sustainable Urban Housing: Design Standards for New Apartments, (2023),
- the Planning Design Standards for Apartments Guidelines for Planning Authorities (2025),
- the Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, (2024),
- the nature, scale and design of the proposed development and the availability in the area of a wide range of social, transport and water services infrastructure, and:



- the pattern of existing and permitted development in the area,

it is respectfully put forward that the proposed development constitutes an acceptable quantum and density of development in this location, will not seriously injure the residential or visual amenities of the area, is acceptable in terms of urban design, height and quantum of development and is acceptable in terms of traffic and pedestrian safety. Taking all of the foregoing set out in this Planning Report and as supported by all of the documentation and drawings submitted as part of this LRD application for permission, we consider that the proposed development is in accordance with the proper planning and sustainable development of the area. We therefore respectfully request that the permission being sought be granted, subject to whatever the Planning Authority considers appropriate.

Yours sincerely,

Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Chartered Town Planner
Armstrong Fenton Associates.
Planning & Development Consultants

APPENDIX 1

Correspondence from Department of Education – dated 11th April 2025.

From: Hanlon, Alan
To: Tracy Armstrong
Cc: Hanly, Murty; Garry, Mairead
Subject: FW: School site, Boherboy, Saggart, Co. Dublin
Date: Friday 11 April 2025 13:53:53
Attachments: image003.wmz
image001.png
Boherboy Site Layout Plan DRAFT 250220.pdf

Tracy,

Thanks for sending us the above proposed new layout plan for the site at Boherboy.

We note the proposed changes from the original plan. These changes as per the attached document work better and therefore the new proposed layout is agreeable to us.

Regards

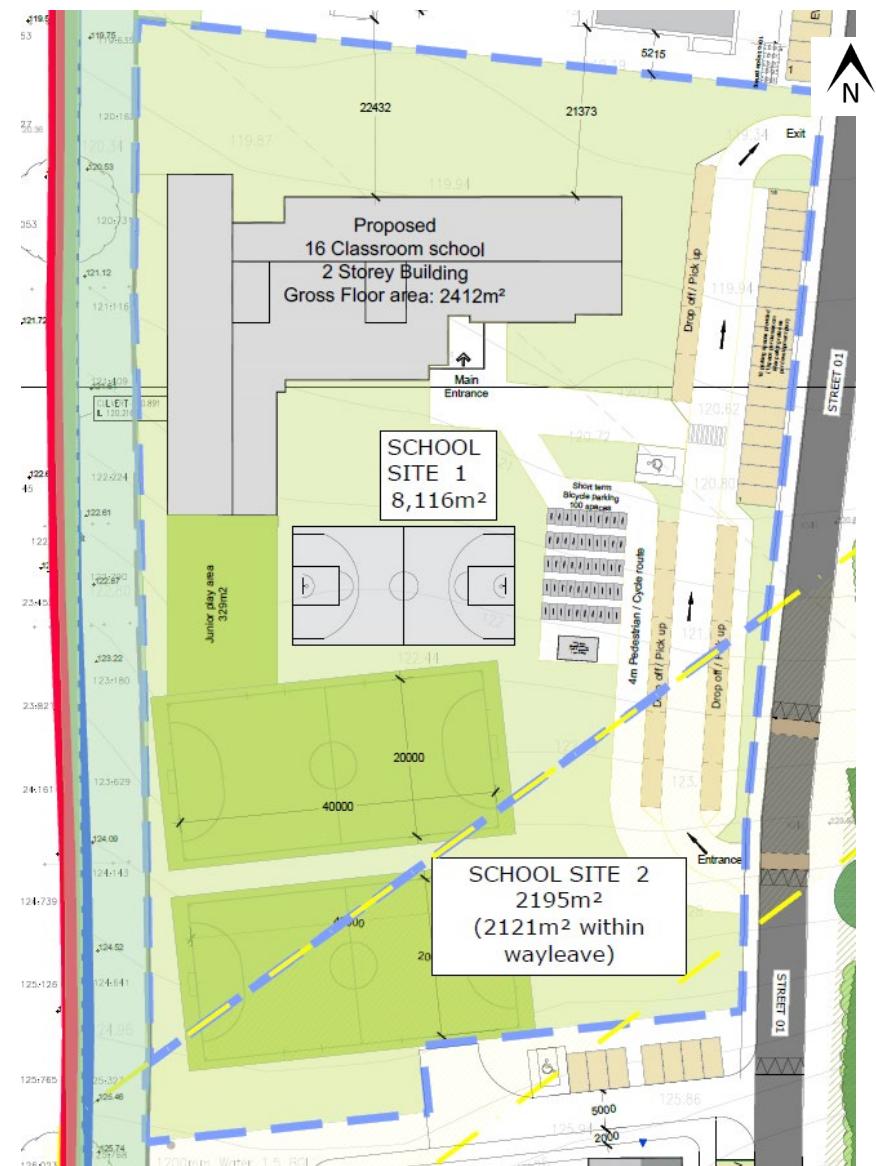
Alan
*Assistant Principal Officer
Statutory Plans,
Forward Planning & Site Acquisitions Section*

An Roinn Oideachais
Department of Education

Bóthar Phort Laoise, An Tulach Mhór, Co. Uibh Fhailí, R35 Y2N5.
Portlaoise Road, Tullamore, Co Offaly, R35 Y2N5.

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+353(57)93 2 4474

Fig. 54 – Indicative site layout plan for school site illustrating the accommodation of a 16 classroom primary school on same as submitted to Department of Education



A

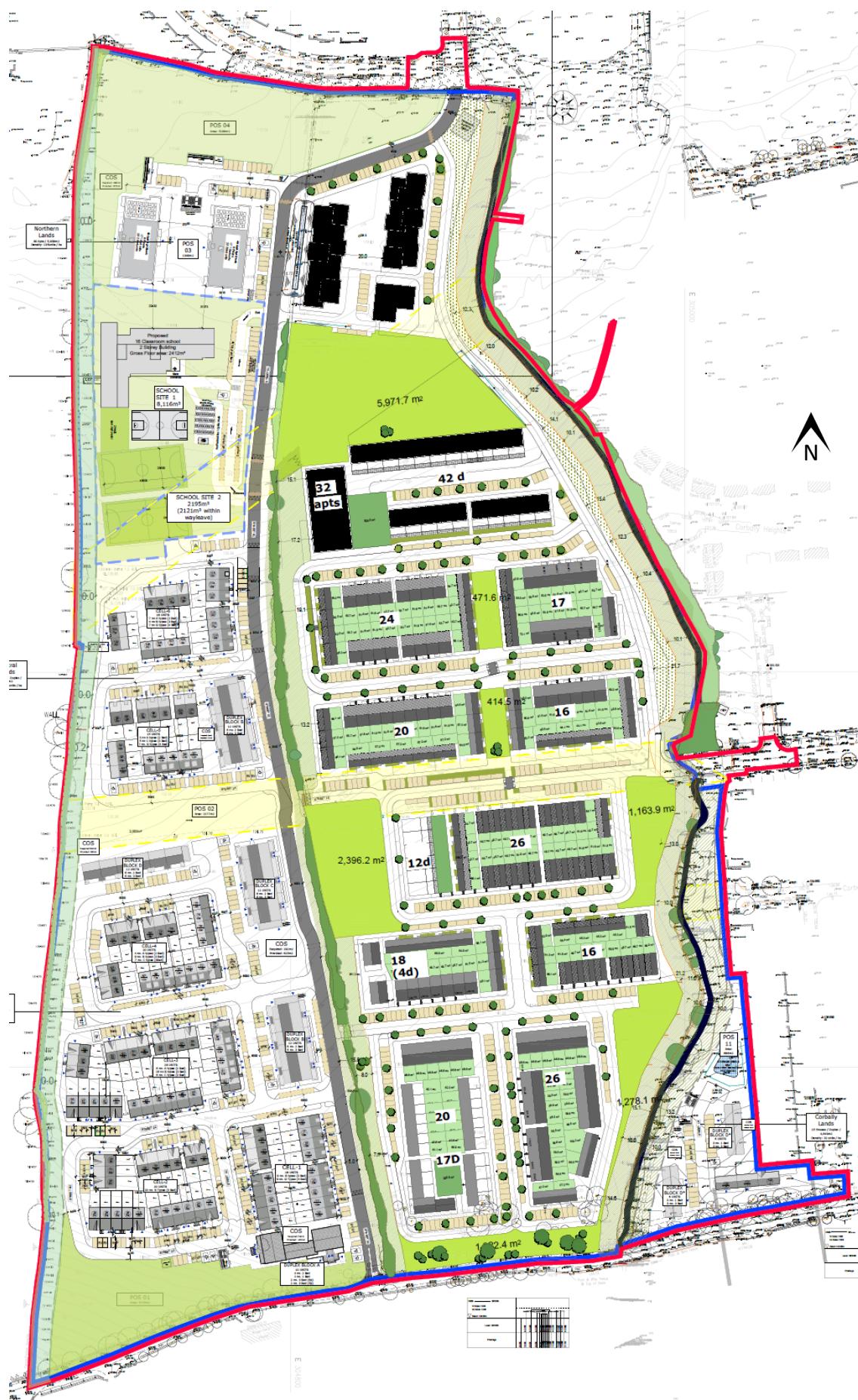


Fig. 55 – Indicative site layout plan for school site illustrating the accommodation of a 16 classroom primary school on same as submitted to Department of Education



Appendix 2

In submitting this application for permission, letters of consent from the following have been provided to the Applicants, in allowing lands outside of their ownership / control to be included within the subject red line of application:

- 1) Mary Kelly is the registered owner of the lands on the eastern side of the proposed development, being put forward for permission by Kelland Homes Ltd.
- 2) Violet Express Limited is the owner of the lands in the south-eastern part of the subject application site (where 10 no. houses are proposed).
- 3) Aderrig 4 Residential Limited is the registered owner of the lands on the eastern side of the proposed development, being put forward for permission by Evara Developments Limited. [NOTE: Evara Developments is under the same umbrella as Aderrig 4 Residential Limited].
- 4) South Dublin County Council to the Applicants consenting to the inclusion of their lands as part of the subject application.

A

9th December 2025.

Russell Square Centre, Unit 5,
Fortunestown Way,
Tallaght,
Dublin 24.

Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24.

Re:

**Proposed Large-scale Residential Development at
Boherboy, Saggart, Co. Dublin.**

Dear Sirs,

I, Mary Kelly, hereby consent to Kelland Homes Ltd submitting a planning application for a proposed Large-scale Residential Development of 611 no. dwellings, crèche and all associated site development works, on a site in the townland of Boherboy, Saggart, Co. Dublin.

I note the proposals as part of the planning application, and consent to the inclusion of my land as part of the application for the proposed development. I note the extent of the application site as indicated by the red outline on the site location map enclosed with the planning application.

I trust the above is of assistance to you.

Yours faithfully,

Clare Tchey Attorney for
Mary Kelly under Enduring
Power of Attorney 15th December 2015

Mary Kelly

A

9th December 2025.

1st Floor Maple House,
Lower Kilmacud Road,
Stillorgan,
Co. Dublin.

Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24.

Re:

**Proposed Large-scale Residential Development at
Boherboy, Saggart, Co. Dublin.**

Dear Sirs,

We, Violet Express Limited, hereby consent to Kelland Homes Ltd & Evara Developments Ltd submitting a planning application for a proposed Large-scale Residential Development of 611 no. dwellings, crèche and all associated site development works, on a site in the townland of Boherboy, Saggart, Co. Dublin.

We note the proposals as part of the planning application, and consent to the inclusion of our land in the south-east corner of the application site which is included as part of the application for the proposed development. We note the extent of the application site as indicated by the red outline on the site location map enclosed with the planning application.

We trust the above is of assistance to you.

Yours faithfully,


Patrick Kelly – Director
On behalf of Violet Express Ltd.

Aderrig 4 Residential Limited

Fitzwilliam Court, Leeson Close, Dublin 2, D02 YW24, Ireland
Tel. No: + 353-1-5260352

Senior Administrative Officer,
Planning Department,
County Hall,
Belgrave Square North,
Tallaght,
Dublin,
Ireland
Eircode: D24 FKT9

Date: 01 December 2025 | 5:14:32 PM GMT

RE: THE PROPOSED DEVELOPMENT CONSISTS OF 611 NO. DWELLINGS, COMPRISED OF 306 NO. 2, 3, 4 & 4-5 BED, 2 & 3 STOREY, DETACHED, SEMI-DETACHED & TERRACED HOUSES, 133 NO. 1, 2 & 3 BED DUPLEX UNITS IN 12 NO. 2-3 STOREY BLOCKS, AND 172 NO. 1, 2 & 3 BED APARTMENTS IN 5 NO. BUILDINGS RANGING IN HEIGHT FROM 4-5 & 5 STOREYS. THE PROPOSED DEVELOPMENT ALSO INCLUDES A 2-STOREY CRÈCHE (C.630M²). THE PROPOSED DEVELOPMENT PROVIDES FOR (I) ALL ASSOCIATED SITE DEVELOPMENT WORKS ABOVE AND BELOW GROUND, INCLUDING SURFACE WATER ATTENUATION & AN UNDERGROUND FOUL SEWERAGE PUMPING STATION AT THE NORTHERN END OF THE SITE, (II) PUBLIC OPEN SPACES (C. 2.3HA), (III) COMMUNAL OPEN SPACES (C. 4,750SQ.M), (IV) HARD & SOFT LANDSCAPING AND BOUNDARY TREATMENTS, (V) SURFACE CAR PARKING (978 NO. CAR PARKING SPACES), (VI) BICYCLE PARKING (711 NO. BICYCLE PARKING SPACES), (VII) BIN & BICYCLE STORAGE, (VIII) DIVERSION OF ALL EXISTING OVERHEAD ESB LINES UNDERGROUND, (IX) PUBLIC LIGHTING, AND (X) PLANT / PV PANELS (M&E), UTILITY SERVICES & 8 NO. ESB SUB-STATIONS, ALL ON AN OVERALL APPLICATION SITE AREA OF C.18.7HHA. IN ACCORDANCE WITH THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN (2022-2028), AN AREA OF C.1.03HA WITHIN THE SITE IS RESERVED AS A FUTURE SCHOOL SITE.

To whom it may concern,

In reference to the above, Aderrig 4 Residential Limited, confirms its consent to Evans Developments Limited lodging a planning application in respect of the site known as Boherboy, Co. Dublin and to engage with South Dublin County Council on matters relating to the Site to include lodging further planning permission applications and any associated pre-planning meetings.

Yours faithfully,

Michael Hynes

Director

On behalf of Aderrig 4 Residential Limited.

Directors: Michael Hynes, Colm Daly, Niall O'Breacalla

Company Registered Office: Fitzwilliam Court, Leeson Close, Dublin 2, D02 YW24, Ireland
Registered in Dublin, Ireland with Company Registration No: 757943



Comhairle Contae
Átha Cliath Theas

South Dublin
County Council

+353 1 414 9000
info@southdublinccc.ie
sdcc.ie

Armstrong Fenton Associates
13 The Seapoint Building,
44-45 Clontarf Road,
Dublin 3,
D03 A0H34

Date: 2/12/2025

**WITHOUT PREJUDICE
SUBJECT TO CONTRACT/CONTRACT DENIED**

Re: Grant of Consent relating to a planning application at Boherboy, Saggart, Co. Dublin.

Dear Sir/Madam

I refer to your request, on behalf of Kelland Homes Ltd. and Aderrig 4 Residential Ltd, to include lands in charge of the Council in a planning application to facilitate a joint Large-scale Residential development (LRD) at Boherboy, Saggart, Co. Dublin.

I now wish to confirm that South Dublin County Council hereby grants its consent to include lands that are within it's charge outlined in red on Drawing No. BHBY-MRM-AR-ZZ-DR-P3-XX-XX-0010 in a planning application for the purposes outlined above.

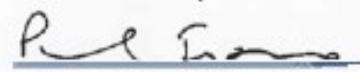
The Council's Water & Drainage Section report identifies the location of a number of watermains within the area of the site. Armstrong Fenton Associates have confirmed that there are no building works proposed within 8m of the 1200mm dia. watermains, within 7m of the 27" & 24" dia. watermains & within 10m of the top of the bank of the stream.

Please note that this consent does not convey to Armstrong Fenton Associates or your clients, Kelland Homes Ltd. and Aderrig 4 Residential Ltd, any interest whatsoever in the subject lands and is for the sole purpose of allowing a planning application to be made.

This consent is valid for a period of twelve months from date of this letter.

The consent is conditional on no development taking place until full planning permission has been granted and the Council is in a position to enter into an appropriate legal agreement with Kelland Homes Ltd. and Aderrig 4 Residential Ltd in respect of the development and use of lands.

Yours sincerely,



Paul Fusco

Oifigeach Feidhmiúcháin Sinsearach Gníomhach
A/Senior Executive Officer

Comhairle Contae Átha Cliath Theas. South Dublin County Council,
Halls an Contae, Tamhlacht,
Baile Átha Cliath 24, D24 AX3C. County Hall, Tallaght,
Dublin 24, D24 AX3C.

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GENERAL NOTES

GENERAL NOTES

1. IN THE STATE OF MASSACHUSETTS, DATED 10 FEBRUARY 1941.
2. ACCEPTED TO BE A COPY OF AN ORIGINAL DOCUMENT.
3. DRAWN TO BE A DRAWING OF AN ORIGINAL DRAWING.
4. DRAWN TO BE A DRAWING OF AN ORIGINAL DRAWING.
5. DRAWN TO BE A DRAWING OF AN ORIGINAL DRAWING.

A map of a coastal city area. A proposed boundary is outlined in red and blue. The red line follows the coastline, with several small red squares indicating specific points of interest or survey markers. The blue line follows a more inland path, defining a larger area. The map includes a grid of streets, a large circular area in the center, and a bridge structure in the upper right.

LED APPLICATION - STAGE 3

Site Location Map

**SITE BOUNDARY OF PLANNING APPLICATION
LANDS IN OWNERSHIP**

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