

The c.150 retail units (including retail services, restaurants etc) in Stillorgan comprise a cumulative 20,000sq.m of gross floor area. A subset of this gross floor area – the net retail sales area– is used for the calculation of the District Centre cap of 25,000 sq.m.in Stillorgan. The variation between gross floor area and net retail sales area can vary quite considerably from one retail unit to another, but a general rule of thumb is that the net retail sales area comprises approximately 2/3 of the gross floor area.

### 4.3.2 Policy Context

The overarching policy framework for retail development within Stillorgan, and the County generally, is established nationally by 'The Retail Planning Guidelines for Planning Authorities' (2012), the 'Retail Strategy for the Greater Dublin Area 2008-2016' and the relevant elements of the current County Development Plan. The Local Area Plan must be consistent with these higher-tier policy frameworks.

#### 4.3.2.1 Retail Planning Guidelines for Planning Authorities (2012)

The National 2012 Retail Planning Guidelines seek to ensure that the planning system supports competitiveness and choice in the retail sector commensurate with promoting the vitality and viability of city and town centres. The Guidelines (and the 'Best Practice' Retail Design Manual that accompanies them) advocate that retail development should also positively contribute to a higher standard of urban design and the greater use of public transport. The Retail Design Manual identifies ten principles of urban design as follows:

- Design Quality
- Site and Location
- Context and Character
- Vitality and Viability
- Access and Connectivity
- Density and Mixed Use
- Public Realm
- Built Form
- Environmental Responsibility
- Sustainable Construction

#### 4.3.2.2 Retail Strategy for the Greater Dublin Area 2008-2016

The Retail Strategy for the Greater Dublin Area places Stillorgan in the Retail Hierarchy as a 'Level 3 Town and District Centre' and goes on to recommend that Stillorgan District Centre be reinvented and revitalised to bring it back in line with modern retailing needs. Policies in the Strategy support the viability of existing District Centres and to allow for the redevelopment and rejuvenation of ageing centres, to facilitate changing retail patterns and needs and to move away from single use sites by integrating retail provision at district level with other services, offices and residential to create vibrant centres serving the surrounding housing districts. The Strategy states in respect of Stillorgan:

*"Centres such as the Blackrock, Stillorgan, Nutgrove and Ballymun areas have shopping redevelopment potential, which is desirable in terms of being a reinvention and enhancement of existing stock, to bring it in line with modern retailing needs."*

#### 4.3.2.3 County Development Plan Retail Policy

The County Development Plan 2016- 2022 sets out a Retail Hierarchy for the County. At the top level of the Hierarchy are the two Major Town Centres of Dún Laoghaire and Dundrum. The second tier in the hierarchy includes six District Centres – of which Stillorgan is one. The strategy for Stillorgan, as stated in the Retail Hierarchy is to 'Encourage potential redevelopment as higher density, urban mixed-use centre in accordance with general provisions of the adopted Local Area Plan. Limited expansion of convenience and comparison retail floorspace.' The net retail sales area for the entire Stillorgan District Centre is capped by the County Development Plan at 25,000 square metres.

This net retail sales area cap includes 'retail services' which are defined in the Retail Strategy for the GDA 2008-2016 as non-retail uses such as beauticians/banks/coffee shops occupying retail units).

Applications for new retail development, or for amendments to existing retail development, in the Stillorgan District Centre will require to clearly identify and quantify the net retail sales area on any plans submitted with the planning application. This will help facilitate continued monitoring of the cumulative retail 'cap'.

#### 4.3.3 Commercial Office

As noted in Section 2.4.2, in terms of the commercial office floorspace, at only 5,000sq.m in total, the scale of commercial office activity in Stillorgan is clearly less significant than other District Centres in the County. Blackrock, for example, comprises over 35,000sq.m in commercial office floorspace.

While the primacy of the retailing/retail services/leisure function of the District Centre is not proposed to change, larger-scale commercial office development is 'Open for Consideration' within the District Centre zoned lands. It is considered that, having regard to the high levels of public transport accessibility to Stillorgan, and the benefits of maintaining a mix of development types, some commercial office development may be acceptable as part of the redevelopment of the larger regeneration sites in Stillorgan. The Site Framework Strategies include Objectives in this regard.

#### 4.3.4 Commercial Leisure

'Commercial Leisure' is defined in the County Development Plan 2016-2022 as "*facilities run on a profit basis ..to include cinemas, family entertainment centres such as bowling, indoor children's play centres, fitness centres, gyms, swimming pools etc.*" P.82.

'Commercial Leisure' has clearly played a significant role in Stillorgan's history, with the presence of a cinema in the Village since the 1950's and the establishment of Ireland's first bowling alley in the 1960's – both still important features in the Village.

A key policy of the Regional Strategy is to promote forms of development which are easily accessible, particularly by public transport and in a location which encourages multi-purpose shopping, business and leisure trips on the same journey.

Policy in the County Development Plan seeks to ensure that all major commercial leisure developments are located in accordance with a sequential test approach. In this respect, Stillorgan, as a District Centre is well-positioned to accommodate a higher-order scale of commercial leisure development and it is an Objective of the LAP to facilitate commercial leisure development proposals, at an appropriate scale.

Retail/Commercial Objectives	
R1	It is an objective of the Council to strengthen the role of Stillorgan as a District Centre as identified in the Retail Strategy for the GDA 2008-2016 and the County Development Plan 2010-2016, at a scale appropriate to this designation and to promote it as the primary retail location in the wider Stillorgan area.
R2	It is an objective of the Council to limit the net retail sales area within Stillorgan District Centre to 25,000 square metres in accordance with the Dún Laoghaire-Rathdown County Development Plan.
R3	It is an objective of the Council to encourage a broad mix of uses within Stillorgan that contribute to the creation of a sustainable and vibrant District Centre that is the focus for social and business interaction. New development shall be required to demonstrate how it complements or enhances the existing mix of uses
R4	It is an objective of the Council to require that all new retail development is designed in accordance with the best practice principles set out in the Retail Design Manual - companion document to the Retail Planning Guidelines 2012.
R5	It is an objective of the Council to require a high quality of design and finish for new shopfronts and signage in Stillorgan that enhances the local streetscape and public realm
R6	It is an objective of the Council to facilitate the development of commercial leisure, entertainment and cultural facilities in Stillorgan.



Photo 9: View to Stillorgan Decor

## 4.4 Key Development Sites

There is a strong likelihood that a number of Key Development Sites in Stillorgan will undergo significant redevelopment and renewal in the coming years. The built form of Stillorgan has remained relatively unchanged for a considerable period of time. The cumulative effect of many of the largest sites in the area undergoing comprehensive redevelopment could result in a profound change for the Village. An important element of the Draft LAP involves putting in place key objectives for these sites, in order to guide their redevelopment. This Section first provides general policy guidance in relation to development across all of the Key Development Sites and then goes on to provide a 'Site Development Framework for each of the six sites:

- Stillorgan Shopping Centre
- Blakes/Esmonde Motors
- LeisurePlex, Library and Environs
- Overflow Carpark
- Millhouse
- Stillorgan Mall



Photo 10: New sign at Stillorgan Shopping Centre

While there are certain site-specific issues that pertain to these individual sites, there are also a number of overarching objectives that apply to all of the sites. These issues are discussed separately below:

- Cooperation between landowners/developers
- Residential Development
- Building Height
- Plot Ratio

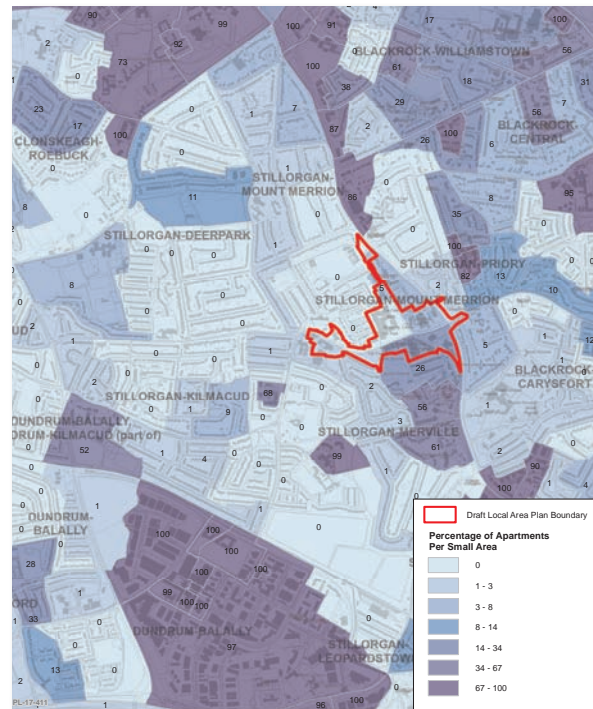
### 4.4.1 Cooperation Between Landowners/Developers

Given the multiplicity of landownerships across a number of the Key Development Sites in Stillorgan, it would be of significant benefit to achieve a cooperative approach to redevelopment activity. The Draft National Planning Framework (2017) places a specific emphasis on the increasing importance of 'landholder commitment to co-operation' in relation to the delivery of coherent, well-planned development.

The NPF correctly identifies cooperation between landowners as being a vital element of ensuring optimal land management outcomes. It is an Objective of the LAP to encourage and facilitate cooperation between the various landowners of the key regeneration sites in Stillorgan, to ensure the best possible outcomes in the event of redevelopment and renewal.

## Key Development Sites Objectives

KDS1	It is an objective of the Council to encourage a rich mix of uses to create vitality.
KDS2	It is an objective of the Council to encourage specific uses at appropriate locations which respect their context.
KDS3	It is an objective of the Council to encourage the cooperation between adjoining landowner/developers in such a way that sites can realise their full potential and support the overall strategic objectives for the area.
KDS4	It is an objective of the Council to improve public realm through the promotion of high quality architecture, urban design and an open, pedestrian friendly environment.
KDS5	It is an objective of the Council to provide a mix of public spaces with high quality landscaping and street furniture.
KDS6	It is an objective of the Council to promote design of buildings that respect and have regard to their context and neighbouring amenity.
KDS7	It is an objective of the Council that, when considering the cumulative redevelopment potential of District Centre lands, that net retail sales area in Stillorgon District Centre zoned lands continue to be capped at 25,000 sq.m



Map 12: Housing Mix – Apartment Provision

The changing demographics and the ageing of the County's population profile poses a challenge for the development of a housing policy that is responsive to people's needs. While the majority of older people own their own homes, some may find that their accommodation is not entirely suitable to their needs. For those who wish to continue to live independently, it is important that the opportunity exists to trade down or downsize in the area in which they live to a smaller dwelling or apartment.

In promoting apartment development in these key sites, there is an opportunity to respond to some of the strategic policy objectives of the County Development Plan aimed at densifying and intensifying land use within the County and also promoting opportunities for older householders to avail of the option of 'downsizing' within their community.

In particular, there is an opportunity to promote a varied housing mix to respond to the needs locally, including housing choice for older people who may want to downsize and remain in the area which is well served by public transport and local services and amenities. Opportunities to develop Lifetime Homes and environments using universal design principles will also be considered to support an Age Friendly environment into the future.

### 4.4.2.1 Student Accommodation

It is County Development Plan policy to "facilitate student accommodation on student campuses or in locations which have convenient access to Third Level colleges (particularly by foot, bicycle and high quality and convenient public transport) in a manner compatible with surrounding residential amenities." P.43

By virtue of its close proximity to UCD (just 2km from Belfield campus), Stillorgon is well located for the provision of purpose-built student accommodation, as part of the overall mix of residential development in the area.

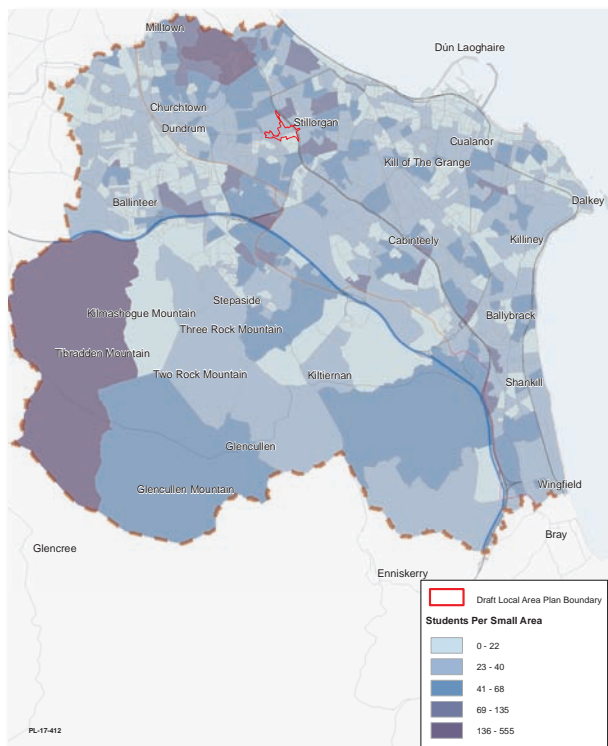
## 4.4.2 Residential Development

While the primary function of Stillorgon will continue to be as a retail and commercial centre, it is an Objective of the Plan that redevelopment proposals for certain key sites in Stillorgon will incorporate a residential element. The 'gateway' sites located at either side of the Lower Kilmacud Road at the junction with the N11 are particularly appropriate for an element of infill residential development, by virtue of their location proximate to public transport and the site characteristics .

It is proposed that residential schemes in these sites should include housing types, particularly apartments, that will complement those that already exist in the Plan area environs with the objective of creating a more varied housing mix in the area.

The map below illustrates a perspective on the housing mix in the environs of Stillorgon, specifically the percentage of apartments in each Census 'Small Area'. In many of the Small Areas around Stillorgon, the percentage is zero, a reflection of the homogeneity of the building stock – essentially 100% 3-bed semis - while some areas with much higher percentages are located along the N11 corridor and in nearby Sandyford and UCD.

According to Census 2016, there are c.25,500 students in total resident in the County. Of the 25,500 students in the County, 17,500 (or almost 70% of them) live within a 5km distance of UCD – of which approximately 2000 live on campus in UCD. There are c.2000 students resident within the wider Stillorgan area, that is, within the six Stillorgan Electoral divisions. Many students live in shared rental accommodation, in houses and apartments that may not be entirely suitable for their housing needs, being more suited to family requirements. The provision of purpose-built accommodation, both on campus and proximate to campus, may have a wider benefit in freeing up some of the mainstream rental stock for other households.



Map 13: Third Level Students

In assessing student accommodation proposals in Stillorgan, the Planning Authority will have regard to the pattern and distribution of student accommodation in the locality, and will resist the overconcentration of such schemes in any one area, in the interests of achieving a sustainable mix of development, whilst also providing for successful urban regeneration, good public transport/cycling/ walking connectivity, and the protection of residential amenity.

Residential Objectives	
RS1	To promote high quality homes and quality residential choices for a range of household needs including housing choice for older people who may want to downsize.
RS2	To promote sustainable higher densities and quality innovative housing designs.
RS3	It is an objective of the Council that sites with opportunity for new residential development identified in Chapter 4 shall be designed and developed in accordance with the principles of the Site Framework Strategies.

RS4	The Planning Authority will promote the development of purpose built student accommodation as part of the overall mix of residential development in the Plan area, having regard to the pattern and distribution of student accommodation in the locality, and will resist the overconcentration of such schemes in any one area.
RS5	The Planning Authority will promote the provision of 'Lifetime Homes', applying universal design guidelines to provide a more seamless and appropriate continuum of housing choice and options for older people.

#### 4.4.3 Building Height

The Site Framework Strategies for each of the Key Regeneration Sites provides recommended benchmark building heights. The Building Heights Strategy, included as an Appendix document to the Dún Laoghaire-Rathdown County Development Plan 2016-2022 sets out the policy at a County-wide level for building height. The Strategy acknowledges that *"the appropriate vehicle for identifying the specific sites within these centres that have potential for accommodating building height are statutory (and non-statutory) local plans – be they Local Area Plans, Framework Plans or SDZ's."* P.23

In relation to Stillorgan and the provision of taller buildings along the N11 corridor, the Strategy states that *"the N11, owing to its width, strategic importance, and public transport facilities, has the potential to become an attractive urban corridor enclosed by taller buildings of high quality, at locations which are also proximate to social and community infrastructure"* P.18

The Building Heights Strategy states that there are situations where a modification up or down in height could be considered. The factors that may allow for this are known as 'Upward or Downward Modifiers'.

Examples of Upward Modifiers are given as when:

- (i) a development would enclose a main street or mark a major cross-roads and/or transport interchange to the benefit of its legibility, appearance, or
- (ii) if the development would contribute to the promotion of higher densities in areas with exceptional public transport accessibility.

Another consideration is the size of a site – for example a site size of 0.5ha or more could set its own context for development and may have potential for greater building height away from boundaries with existing residential development.

Both of these criteria are relevant to Stillorgan, in that a number of the key sites are both proximate to high quality public transport provision and also of significant scale.

The Building Heights Strategy states in relation to Landmark Buildings that *"a landmark building is a single outstanding building which is either taller or of a more notable design than its neighbours. Generally, landmark buildings are higher than their surroundings but they may be created through means*

other than height, such as quality building or public space design. The identification of sites for landmark buildings will only be conducted through the Local Area Plan/Strategic Development Zone/Urban Framework Plan/Development Plan Variation process.”

The Building Heights Strategy goes on to state that “the main determining factor in setting heights will not be the heights established in recent and proposed developments. Rather it will be the need to create a good piece of urban development with attractive streets that knits successfully with the surrounding area. The important factors which determine height will be the impact on adjacent residential amenities, the proportions of the building in relation to the street space, the creation of a good sense of enclosure, the provision of active ground floor street frontages and a legible, permeable and sustainable layout.”

The Site Framework Strategies for some sites envisage a greater level of building height than has previously been developed in Stillorgan. The recently published Draft National Planning Framework (NPF)(2017) gives an indication of the policy progression from Central Government on the issue of determining building height in the planning system. The Draft NPF states that:

“general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance based criteria appropriate to general location e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.”P.51

4.4.3.1 Building Height Criteria

In the context of this evolving policy guidance, the benchmark and landmark heights proposed for Stillorgan have been based on an assessment of the ‘receiving environment’ of and ‘performance based’ criteria relevant to the various sites. The criteria-based assessments of height policy for the regeneration sites have been based on the following:

- Land use zoning
  - Specifically, the ‘District Centre’ zoning for Stillorgan places it second only to the Major Town Centres of Dun Laoghaire and Dundrum in the settlement hierarchy, and suitable for a higher density of development due to its proximity to amenities and services.
- Site Location Characteristics
  - With particular reference to accessibility to high demand areas – Sandyford, UCD, City Centre
- Site size
- Adjacent Road widths
  - Specifically, the expansive width of the N11 corridor, up to 40m in some places
  - Also, the width of the Lower Kilmacud Road close to the N11 Junction, up to 23m adjacent to a number of the redevelopment sites

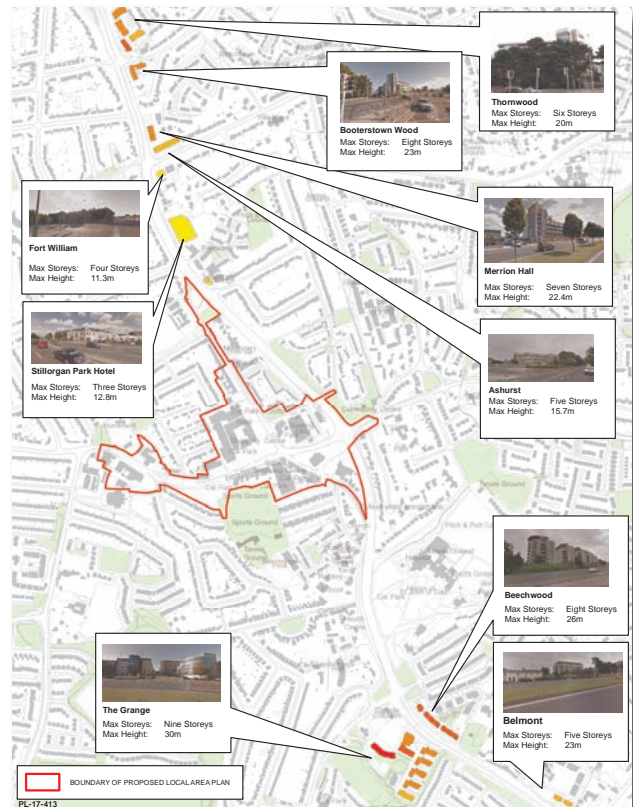
- Relationship with adjoining/adjacent buildings
- Physical site characteristics (i.e. site depth and width), and site location (i.e. corner or mid-block sites)
- Topography – see topography map (Map 15).
- Contextual Development trends – specifically trends in building heights along the N11 corridor in the last 10-15 years, with some schemes of 8-9 storeys (Map 14).
- 3D modelling/shadow analysis

An analysis of these criteria for each of the six Key Development Sites has led to a recommended benchmark height for each site. The analysis also included an assessment of the capacity of the key N11/Lower Kilmacud Road junction sites.

The N11 corridor, as set out in the following Section, has seen increased building height along its edge in recent years. As this area of the LAP has the most likely potential for taller buildings, particular attention was paid to an analysis of various height scenarios for these sites.

As referred to earlier in the document, in Section 2.2, the construction of the N1 Bypass created a situation where the lands between the village core and the N11 were developed in a manner that allowed the village to ‘bleed’ into the N11 without a coherent sense of enclosure or entry point to Stillorgan. A more coherent approach to the development of these key sites will be an Objective of the LAP.

The following Section sets the context for the building height objectives that are outlined for each Key Development Site.



Map 14: Building Heights along the N11 corridor

#### 4.4.3.2 Building Height Context

The trend toward taller buildings along the N11 Corridor in Dún Laoghaire-Rathdown over the last 10-15 years reflected, in wider terms, the change over time in National policy, driven by the Residential Density Guidelines (1999) and the subsequent Sustainable Residential Development in Urban Areas (2008) which required local authorities to promote higher residential densities proximate to public transport corridors.

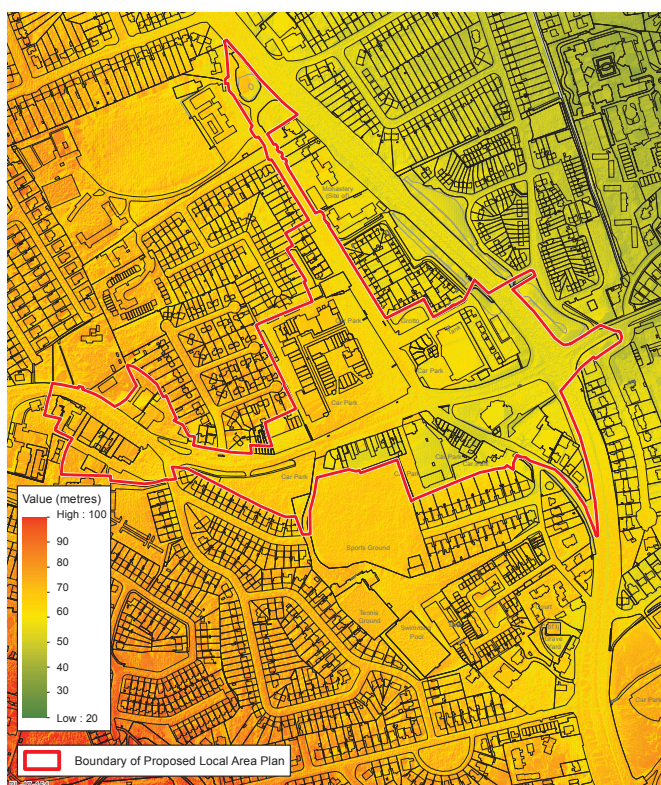
The width of the corridor, at over 40 metres in some places, provided a particular opportunity for taller buildings to enclose this space.

As can be seen from Map 14, there are now apartment schemes, ranging in height from 4 to 9 storeys located at the key junctions of the N11, adjacent to Stillorgan, with the notable exception of the Stillorgan junction itself. The LAP, through the Site Framework Strategies set out in Section 4.5, establishes building height guidelines for these key N11 junction sites.

#### 4.4.3.3 Topography and Building Height

One of the 'Upward Modifiers' identified in the Building Heights Strategy relates to the topography of the site, specifically, if the site is located *"in a dip or hollow, behind a rise, or near a large tree screen, where the impact of a higher building would have little or no additional impact on its surroundings."*

The topography map below shows the change in levels from the centre of Stillorgan Village, falling away toward the N11 Corridor. Taller buildings set against the backdrop of a rising, sloping landscape can have a lesser visual impact than buildings located at a more prominent location that break the skyline



Map 15: Topography Map - 10m Contours

There is a level differential of 8 to 10 metres and for this reason, the topography of Stillorgan is an important factor to be considered in determining the appropriate location for taller buildings.

#### 4.4.3.4 Building Height Modelling

As part of the assessment of appropriate building heights for Stillorgan, a building height modelling exercise was carried out examining a number of building height scenarios for the key sites in the Village Centre. The images below show a number of height scenarios for some of the key redevelopment sites in Stillorgan, specifically, the Shopping Centre, Leisureplex / library site and Blakes/Esmonde Motors.

A 3D computer model showing the broad outline of the existing building stock in Dún Laoghaire-Rathdown was used (dark green blocks), draped over an accurate terrain model. Building 'blocks' were inserted into this model (transparent green blocks) representing the possible built form of the redevelopment sites, with various different heights/massing/setback scenarios explored. Shadow analysis was also carried out to examine sunlight/daylight impacts.

The analysis indicated a capacity for increased building height at the N11/Lower Kilmacud Road junction, in particular, and the recommended building heights for these sites are set out in Section 4.5.



Figure 5 (a) - Building Height Modelling

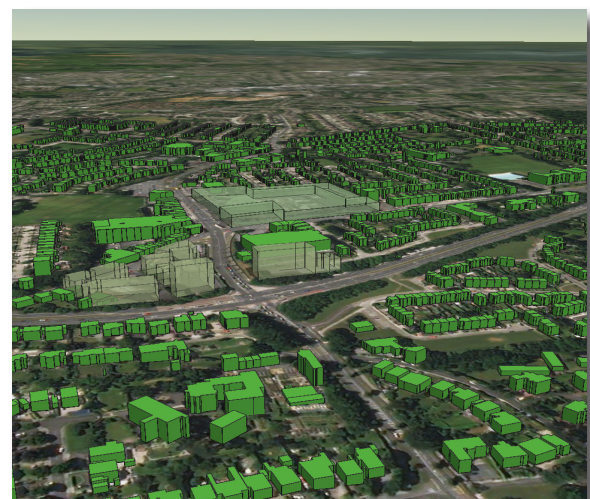


Figure 5 (b) - Building Height Modelling



Figure 5 (c) - Building Height Modelling

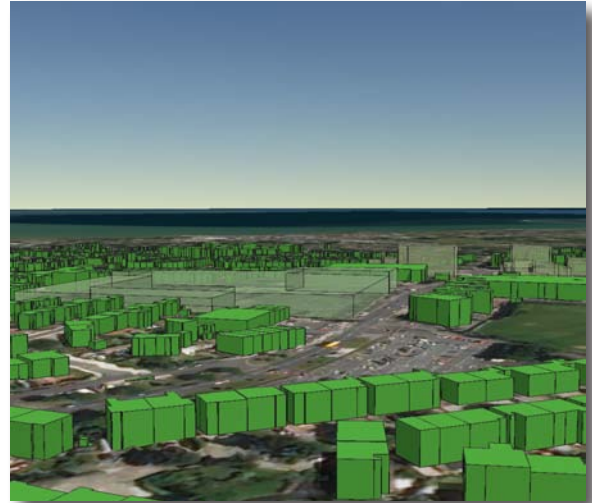


Figure 5 (f) - Building Height Modelling



Figure 5 (d) - Building Height Modelling



Figure 5 (e) - Building Height Modelling

### Building Height Objectives

BH1	<p>It is an objective of the Council promote higher densities and allow for increased building heights around public transport nodes and centres of activity. Guidelines for appropriate building heights will be set out in the 'Site Framework Strategies' for the Key Development Sites. To aid assessment, a design statement will be required for applications for taller buildings (any development where building heights exceed six storeys) in the Plan area. The design statement shall address development context, development objectives, urban design principles, scale and massing, density, materials, details, lighting (day and night time) existing and proposed land and building uses, ground floor uses, treatment of roof top/crown, ground floor treatment and public realm strategy.</p>
BH2	<p>An impact assessment study will also be required to illustrate the impact on the context, especially on residential amenities and significant views. This should be done through accurate visual modelling of proposals – photomontages or three-dimensional computer models (buildings fully rendered) – from relevant assessment points defined by the Council. Proposals should be shown in daylight and nightlight conditions. The micro-climate impact of the development on the surrounding environment (streets, public spaces and existing development) should also be tested in regards to wind funnelling, overshadowing and sun-reflection. Daylight, sunlight and overshadowing analysis will also be a requirement.</p>
BH3	<p>Consideration will be given to the application of upward or downward modifiers in relation to building heights, with reference to site characteristics and the protection of residential amenity</p>