



An
Bord
Pleanála

Inspector's Report ABP-318621-23

Development	Modifications to previously approved build to rent apartment development, including addition of 9 no. new apartments by way of an additional floor; additional bicycle parking, with associated site works		
Location	153-155 Harold's Cross Road, Dublin 6.		
Planning Authority Ref.	4474/23.		
Applicant(s)	BHA HX2 Development Ltd.		
Type of Application	Permission.	PA Decision	To refuse
Type of Appeal	First party	Appellant	BHA HX2 Developments Ltd
Observer(s)	Harold's Cross ETSS; Sean Flanagan		
Date of Site Inspection	6 th Feb 2024	Inspector	Ann Bogan

1.0 Context

1. Site Location/ and Description.

The site, which is 0.079ha in area, is roughly rectangular in shape and fronts on to Harold's Cross Road, and is opposite Harold's Cross Park. The site, which was formerly a garage and car showroom, has been cleared and construction has commenced. It backs onto the former Harold's Cross greyhound race track to the west, currently partially occupied by Harolds Cross Education Together Secondary

school, and where there are plans for a permanent primary and secondary education campus. To the north, the site is bounded by the entrance road to the former greyhound track and a number of 2-3 storey dwellings, and to the south by Peggy Kelly's pub and outdoor dining area, with two to three storey dwellings beyond the pub.

2. Description of development.

Proposed development consists of modifications to the previously permitted Build to Rent apartment development on the site, to include 9 additional apartments (1 two bed, 6 one beds, 2 studios) to bring the total number from 35 units to 44 units, by way of an additional floor. The additional floor is to be inserted between the permitted second and third floors. The top floor will remain the same design and total number of floors will increase from 5 to 6. Additional bicycle parking is provided and it is proposed to replace railings on rear boundary with glazing to improve light.

The application was accompanied by a Design Statement

Revised drawings submitted with the appeal put forward an option of reducing the number of new units in the additional floor from 9 to 7, and reducing number of one bed units (resulting in 2 three beds, 1 two bed, 2 one bed and 2 studios). Shadow analysis drawings also accompany the appeal.

3. Planning History

- **ABP Ref 310947-21** (PA Ref 2712/21): Grant of permission on appeal by An Bord Pleanála for demolition of existing building and construction of 5 story over basement building with 38 build to rent apartments (reduced to 35 units by condition). Most apartments have balconies/terraces; there is a communal roof terrace at top floor level and courtyard at ground floor level, build to rent amenity facilities are located at basement and ground floor level; 62 bicycle parking spaces in basement.
- **4200/21** Grant of permission for change of use of existing building to use as retail and café with ancillary offices.
- **ABP Ref 307208-20** (PA Ref 2172/20): Refusal of permission confirmed by An Bord Pleanála for demolition of garage and construction of 6 storey plus basement

residential development with 43 apartments, communal landscaped rooftop terrace and 11 carparking spaces and 88 bicycle parking spaces in basement.

Refusal reasons in summary:

- Proposed development would constitute overdevelopment and would excessively overlook adjoining properties, fails to integrate with design and scale of adjoining buildings and would seriously injure visual amenities and have negative impact on streetscape and character of the area, would injure amenities of property in the vicinity and be contrary to the Development Plan.
- Apartments would fail to provide a sufficient level of amenity for residents as set out under Sustainable Urban Housing: Design Standards for new apartments Guidelines 2018.

Other relevant planning applications

2851/21 Permission granted for redevelopment of former Harolds Cross Greyhound Stadium as an educational campus for two new schools

4. National/Regional/Local Planning Policy (see Appendix 1 attached, for detail of relevant policies)

National policy/guidelines

- National Planning Framework
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023
- Urban Development and Building Height Guidelines for Planning Authorities December 2018

Dublin City Development Plan 2022-2028 The Dublin City Development Plan 2022-2028 was adopted by the Planning Authority on 2nd November 2022. It has regard to national and regional policies in respect of promotion of compact development and higher densities in urban areas. Relevant policies include:

- Zoning Z1 To protect, provide and improve residential amenities
- QHSN6: Urban consolidation
- QHSN10: Urban Density

- Section 15.5.2 Infill Development
- Section 15.9.8
- Section 15.9.9.

5. Natural Heritage Designations

- None in the vicinity.

2.0 Development, Decision and Grounds of Appeal

6 (a). PA Decision. Refusal of permission for two reasons, in summary:

- Proposal would result in high percentage of 1 bed/studio units resulting in excessive density, plot ratio and site coverage, well in excess of Development Plan standards. It would constitute overdevelopment of the site, would be overbearing on adjoining properties, would seriously injure visual and residential amenities of nearby property which would be contrary to the Development Plan.
- The development fails to provide sufficient communal open space for residents as set out in Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023, and would be contrary to provisions of the Development Plan. It would seriously injure the residential amenities of further occupants of the apartments, contrary to the provisions of the Development Plan and contrary to proper planning and development of the area.

6(b) Observations

Observations were received from Harolds Cross ETSS and Sean Flanagan of Peggys Pub, raising issues similar to those raised in their observations to this appeal. A third observation was received from Dept of Education noting that the parent application included lands in ownership of DOE, and consent was not sought by applicant to include these lands. They also raised concerns re overlooking, overbearing and overshadowing of the DOE site by the additional floor.

7. First Party Appeal Grounds:

- Proposed development would comply with national, regional and local planning policies, including National Planning Framework, including those that promote higher densities in urban areas.
- One bed units are increasingly popular with renters due to changing demographics and lower rent than two bed units and popular with investors due to strong market demand for them.
- The proposed height is in line with other recently approved residential projects in the area
- The development was approved in 2021 when BTR schemes were exempt from unit mix restrictions
- Taking the Council's concerns re unit mix into account, a revised layout is submitted with the appeal, reducing the number of units and reducing number of one bed units and proposal now complies with 2023 Apartment Guidelines
- Harold's Cross neighbourhood has excellent transportation links and a variety of amenities and is well suited to support higher density development
- There would be no substantial harm to amenity of Harold's Cross residents due to additional floor, as there is no direct overlooking at this location. A pragmatic approach is required for infill developments
- Proposed communal open space has been designed taking account of site and development constraints and is adequate to needs of residents and proximity of Harold's Cross Park. Open space provision is in line with SPPR 8.
- Proposal to add 9 (or 7 as per new layout) apartments at this central and accessible location is therefore consistent with proper planning and sustainable development of the area.

8. PA Response

- Request that decision of Planning Authority to refuse permission be upheld
- If permission is granted request that conditions be attached requiring S48 development contribution, payment of bond, payment in lieu of open space requirement not being met, naming and numbering condition and management company condition

9. Observations

Board of Management, Harold's Cross Educate Together Secondary School

- Proposed height and character constitute overdevelopment of the site
- Impacts of increased number of units (16 additional bed-spaces/residents)
- In initial planning permission An Bord Pleanála reduced number of units from 35 to 44 (reduction of 26%) and set back 3rd and 4th floors. These concessions are undone in this appeal.
- Extra floor means a full new storey, not a set-back floor, meaning increased overshadowing and bulk
- Communal amenity space (25sqm ground level courtyard and 94sqm fourth floor terrace) is well below minimum requirements in Apartment Guidelines. Usability of ground floor space further compromised by extra units/residents
- Increase in height from 16.4m to 19.55m is substantial change from what permitted previously which was already above the 16m limit in City Development Plan at the time.

Sean Flanagan, 63 Harold's Cross Road

- Owner of Peggys Pub and Restaurant directly south of the proposed development
- Addition of extra floor will undo any alleviations resulting from the amendments required by An Bord Pleanála in granting the original permission
- Density: Additional 9 units will further diminish amenity of residents where communal space is already well below recommended guidelines.
- Significant increase in residents will have effect on servicing, access and parking which is a serious concern
- No precedent for 6 stories fronting onto Harolds Cross Road. Applicant refers to permission on nearby site of former St Clare's Convent, but this permission was quashed by High Court
- Only 6 story development permitted in area is 126-128 Harolds Cross Road, where increase in height is to rear of site while front is 2-3 stories. Both above sites are larger and have much larger communal space than subject site.

- Current proposal is return to previously refused proposals, and would seriously injure visual amenities and have adverse impact on character of area due to its bulk, mass and monolithic form, and is overdevelopment of site
- Proposal to remove ground floor privacy railing above southern boundary wall and replace it with glass would result in further loss of privacy and amenity for family business.

3.0 Environmental Screening

9. EIA Screening

Having regard to the limited nature and scale of development and the absence of any significant environmental sensitivity in the vicinity of the site, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

10. AA Screening

Having regard to the scale of development, location in an urban area, connection to existing services and absence of connectivity to European sites, it is concluded that no Appropriate Assessment issues arise as the proposed development would not be likely to have a significant effect individually or in combination with other plans or projects on a European site.

4.0 Assessment

4.1. Introduction/Background

- 4.1.1. To briefly summarise the background: Planning permission for a development of the site for 43 apartments, 6 storeys over basement in height, was refused permission by ABP and the planning authority in 2020, as it was considered overdevelopment. In 2021 a revised proposal received planning permission on appeal for 35 build to rent apartments, 5 storeys over basement in height with set 2 back floors. The current proposal for an additional floor and 9 extra apartments to give a total of 44 units, was refused by the planning authority on grounds of overdevelopment, poor

mix of unit types, and substandard communal space. While the appellants argue the proposal is acceptable as applied for, they have submitted an option as part of the appeal to reduce the number of units to 7, with a greater variety of unit sizes. Since the appeal was submitted, the revised Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024 have been published and need to be taken into account.

4.1.2. Having examined the application and appeal documentation on file and having regard to relevant local and national policy and guidance and visited the site, I consider that the main issues in this appeal are those raised in the grounds of appeal and I am satisfied that no other substantive issues arise. The key issues are:

- Zoning provisions and density
- Visual Impact on streetscape and character of the area
- Amenities of adjoining property
- Amenity of apartment residents

4.2. Zoning provisions and density

The area is zoned Z1 to protect, provide and improve residential amenities and as such residential uses are acceptable in principle, provided they do not adversely impact on residential amenities. Objectives QHSN6 and QHSN10 of the City Development Plan support urban consolidation and development of infill sites at sustainable densities, having regard to the need for high quality design and the need to integrate with character of the surrounding area. The Development Plan sets net density ranges for this part of the city of 60-120 dwellings per hectare (dph). (Table 1 Density Ranges Appendix 3) and includes a general presumption against densities in excess of 300dph. It states that schemes in excess of this density will only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented.

4.2.1. The parent permission for 35 Build to Rent units was at a density of 449dph. The Inspector in the report on the appeal noted the Development Plan standards were significantly lower than this, but referred to the now revoked Guidelines for Sustainable Residential Development in Urban Areas 2009 and stated that 'they recommend that there should be no upper limit to density on such an inner

suburban/infill site subject to qualitative standards'. The current application proposes a density of c564dph, or 538dph if the option of reducing units to 42 is applied.

4.2.2. The Compact Settlement Guidelines 2024 take a nuanced approach to density and include varying densities in different scales and types of cities and towns. They include a policy objective for net densities of 50-250dph in Dublin City Urban Neighbourhoods such as this (Table 3.1), and a general presumption against very high density (>300dph), on a piecemeal basis, although such densities may be open for consideration on a plan led basis (Section 3.3.6 of the 2024 Guidelines). As a further indicator of density of development, the Development Plan indicative plot ratios for this area are 1.00 - 2.5. The plot ratio of the proposed development is 4.25, as opposed to the permitted parent permission of 3.5.

4.2.3. The existing permission gave considerable leeway in terms of compliance with density standards, on the basis that it could be justified on this infill site. However, Section 3.3.6(c) of the new Compact Settlement Guidelines states: 'In the case of very small infill sites that are not of sufficient scale to define their own character and density, the need to respond to the scale and form of surrounding development, to protect the amenities of surrounding properties and to protect biodiversity may take precedence over the densities set out in this Chapter'. Taking account of this national guidance and Development Plan density objectives as applying to this area, I am not convinced that there are exceptional circumstances or compelling design arguments put forward to justify a further increase in density over that permitted under the parent permission.

4.3. Visual impact and design

4.3.1. The City Development Plan promotes compact development through height as well as density standards, with a minimum 3-4 storey the target for suburbs outside the canal ring and heights above this to be considered on a case by case basis taking into account local circumstances and various performance criteria. The prevailing height of historic terraces in Harolds Cross is 2-3 storeys and more recent new development in the area is typically 3-5 storeys, with the higher levels generally achieved or permitted on larger sites such as the 4 storey school complex proposed for the Greyhound track to the rear of the subject site, the redevelopment of St Clare's Convent, and 126-128 Harolds Cross Road.

- 4.3.2. The site has a prominent position on Harolds Cross Road and its alignment is forward of the adjoining buildings. The proposed redevelopment is adjacent to, but not directly adjoining traditional two and three storey terraces. The context of an area undergoing material change with redevelopment of lands in the vicinity helped justify the granting of the parent permission development at storeys and 16.4m in height, subject to revised proposals at appeal stage which included setback of the top floor, and smaller setback of the floor below, to help break up the mass and bulk of the building.
- 4.3.3. The proposed additional floor would bring the overall height to 19.55 and 6 storeys. I note the additional floor is inserted at a lower level, as a new third floor, without any setbacks, so the extra floor will result in the building appearing bulkier and more overbearing, as well as higher, when viewed from street level. This is illustrated in the visualisations provided with the planning application, in particular View 7 northwards along Harolds Cross Road, and also in View 1 of the front (south/west) elevations. The applicant references a permission to increase a residential development from 5 to 6 floors on a nearby site at, Nos 126-128 Harolds Cross Road (3420/21). However, I note that this height increase solely referred to a block located at the rear of the site where the ground falls away, while the street frontage consisted of a three storey block. It is therefore not a straightforward precedent for an increase to 6 floors on this smaller site which fronts directly onto the street.
- 4.3.4. While acknowledging that the area is undergoing change, in my opinion, the increased scale and bulk as proposed would have a significant visual impact on the streetscape and wider area. I believe it does not represent a design that responds well to the scale and historic village character of the area and would be overbearing and have an unduly negative visual impact on the area.

4.4. Amenities of adjoining properties

- 4.4.1. Concerns that the development would impact negatively on neighbouring properties have been raised in observations. I note in the parent permission, the appeal documentation included revised proposals to set back the 3rd and 4th floors from the northern, southern and western boundaries to reduce the scale of the development and provide 'relief to the neighbouring properties', and permission was granted in line with these proposals. However, the proposed insertion of the full extra floor as

proposed at a level below the set-back floors will negate somewhat the benefit of the permitted set-backs and is therefore likely to increase negative impact of the development on the amenities of adjacent properties and would appear dominant and overbearing.

- 4.4.2. The parent application was accompanied by a daylight and sunlight assessment report to help assess impact on surrounding properties, however such an analysis is not provided for the current proposal so it is not possible to fully assess impact. Shadow Impact drawings have been provided that show some increase in shading by the proposed development, although minor in most directions, would increase overshadowing on the residential properties to the north of the site.

4.5. Qualitative standards and amenities of residents

- 4.5.1. The parent permission was assessed based on the Sustainable Urban Housing, Design Standards for Planning Authorities 2020 (Apartment Guidelines 2020), under which special provisions applied to Build to Rent schemes, including exemption from dwelling mix requirements and flexibility in provision of private amenity space and communal open space. Under the Apartment Guidelines 2023, these provisions no longer apply and all units must comply with the general requirements for apartments, which include a general maximum of 50% 1 bed/studio units. In the proposed scheme of 44 units, 90% of the units would be 1 bed or studios, of which the 9 new units would be 88% 1bed/studio. The revised option, put forward in the appeal documents with 7 new units (one 2 bed, two 3 bed, two 1 bed and two studios) would have an improved mix, with 57% one bed/studio units. The ensuing mix of units in the overall development would obviously not comply with current unit mix requirements and is of concern to the planning authority, however it is to a large extent a legacy from the parent permission granted under the Apartment Guidelines 2020, and cannot be remedied via the current application.
- 4.5.2. All but 1 of the new units are dual aspect, as are all but 7 of the units in the overall 42 unit development. 5 of the 7 new units have adequate private open space in the form of balconies, while the 2 studio units do not have access to balconies. The proposed apartment and room sizes appear to be in line with overall floor area and room size standards in the Apartment Guidelines 2023.

4.5.3. Based on the minimum required areas in Appendix 1 of Apartment Guidelines 2023, the overall 42 unit development would require communal amenity space of 222sqm, including 42 sqm to serve the 7 new units. The proposed communal open space provision, consists of a 25sqm ground floor amenity area of limited scale and quality, enclosed on all sides; and a 92sqm roof terrace, which would have limited passive surveillance. This gives a total of 116sqm which is unchanged from the parent permission. No extra provision has been made to meet the needs of the additional apartments, which include 2 three bed units suitable for families. Relaxation of standards for infill schemes on sites of up to 0.25ha is possible on a case-by-case basis subject to overall design quality. However, I am not convinced that the proposed communal amenity space is of an adequate amount or quality to meet the needs of future residents in the proposed development and is certainly well below the Apartment Guidelines 2023 standards. Furthermore, the form and quality of communal space is not in accordance with Sections 15.9.8 (communal space) and 15.9.97 (roof terraces) of the Dublin City Development Plan.

4.6. In conclusion, I am not satisfied that the proposal to add an additional floor and additional residential units to the permitted development, would not have significant negative impacts on the amenity of neighbouring properties and of residents in the development itself, and I believe the form and design does not satisfactorily integrate with the character and townscape of the surrounding area, as required by the City Development Plan objectives.

5.0 Recommendation

5.1. I recommend that permission for the development be refused.

6.0 Reasons & Considerations

1. Having regard to the proposal for an additional floor and 9 additional units on this restricted site, it is considered that the proposal would result in an excessive increase in scale, density, and bulk, which would constitute overdevelopment of the site and would have an overbearing impact on the adjacent properties. The proposed development would seriously injure the visual and residential amenities of property in the vicinity and would have a

negative impact on the character and townscape in the area, which would be contrary to the provisions of the Dublin City Development Plan 2022-2028 and out of keeping with the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities 2024 and would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The proposed development fails to provide adequate communal amenity space to serve the needs of residents of the proposed development as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023, which would seriously injure the amenities of future residents and would be contrary to the Dublin City Development Plan 2022-2028 and would, therefore, be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Ann Bogan

Planning Inspector

13th February 2024

Appendix 1 Relevant Policies and Objectives

Sustainable Residential Development and Compact Settlement, Guidelines for Planning Authorities, 2024

Table 3.1 - Areas and Density Ranges Dublin and Cork City and Suburbs

City - Urban Neighbourhoods

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

3.3.6 Exceptions

- (a) There is a presumption in these Guidelines against very high densities that exceed 300 dph (net) on a piecemeal basis. Densities that exceed 300 dph (net) are open for consideration on a plan-led basis only and where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan.
- (b) Strategic and sustainable development locations of scale (described in section 4.4.4 of the Development Plans Guidelines for Planning Authorities 2022) will be capable of defining densities or density ranges across different neighbourhoods on a plan led basis, based on considerations such as proximity to centre, level of public transport service and relationship with surrounding built form. Densities within strategic and sustainable development locations may therefore, exceed the ranges set out in Section 3.3 on a plan-led basis.
- (c) In the case of very small infill sites that are not of sufficient scale to define their own character and density, the need to respond to the scale and form of

surrounding development, to protect the amenities of surrounding properties and to protect biodiversity may take precedence over the densities set out in this Chapter.

Dublin City Development Plan 2022-2028

Volume 1

QHSN6 Urban Consolidation To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.

QHSN10 Urban Density To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

15.5.2 Infill Development Infill development refers to lands between or to the rear of existing buildings capable of being redeveloped i.e. gap sites within existing areas of established urban form. Infill sites are an integral part of the city's development due to the historic layout of streets and buildings. Infill development should complement the existing streetscape, providing for a new urban design quality to the area. It is particularly important that proposed infill development respects and enhances its context and is well integrated with its surroundings, ensuring a more coherent cityscape. As such Dublin City Council will require infill development:

- To respect and complement the prevailing scale, mass and architectural design in the surrounding townscape.
- To demonstrate a positive response to the existing context, including characteristic building plot widths, architectural form and the materials and detailing of existing buildings, where these contribute positively to the character and appearance of the area.
- Within terraces or groups of buildings of unified design and significant quality, infill development will positively interpret the existing design and architectural features where these make a positive contribution to the area.

- In areas of low quality, varied townscape, infill development will have sufficient independence of form and design to create new compositions and points of interest.
- Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts in the surrounding neighbourhood.

15.9.8 Communal Amenity Space

All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development.

15.9.9 Roof Terraces

Roof terraces may be provided in certain circumstances subject to an assessment of accessibility, safety and micro-climatic impacts. Roof terraces will not be permitted as the primary form of communal amenity space but may contribute to a combination of courtyard and or linear green space. The provision of roof terraces does not circumvent the need to provide an adequate accessible ground floor residential amenity that achieves adequate sunlight and daylight levels throughout the day unless exceptional site specific conditions prevail.

Volume 2 Appendices

Appendix 3

Section 3.2 Density

Sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport accessibility and capacity will also determine the appropriate density permissible. A varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the proposal contributes to healthy place making, liveability and

the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods. As a general rule, the following density ranges will be supported in the city.

Table 1: Density Ranges (units per ha)

City Centre and Canal Belt 100-250

SDRA 100-250 SDZ/LAP As per SDZ Planning Scheme/LAP

Key Urban Village 60-150

Former Z6 100-150

Outer Suburbs 60-120

There will be a general presumption against schemes in excess of 300 units per hectare. Recent research has shown that very high density can challenge positive responses to context, successful placemaking and liveability aspirations, sometimes resulting in poor quality development. Schemes in excess of this density will be only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented.

Section 4 The Compact City

Pg 219 Identification of Areas for Increased Height and Density

The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, Key Urban Villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development. The Building Height Guidelines note that general building heights of at least three to four storeys, coupled with appropriate density in locations outside what is defined as city centre, and which would include suburban areas, must be supported in principle at development plan level.

In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height.

Pg 222 Key Urban Villages

Key Urban Villages are identified and policies and objectives regarding their future development are set out in Chapter 7. Urban villages are at the heart of residential communities. They function to serve the needs of the local communities providing a range of commercial and community uses for surrounding neighbourhoods. A number of the Key Urban Villages have the potential to fulfil the '15 Minute City' role with compact urban and mixed use development; higher urban densities; viable commercial cores with a comprehensive range of high quality community and commercial facilities; high quality urban environments; and high levels of access to quality public transport / the development of sustainable transport modes. Many of the city's urban villages are underdeveloped and have scope for greater intensification and consolidation. It is acknowledged however, that some of the urban villages have a prevailing low density character and any proposals for increased height and density will need to have regard to the existing pattern and grain of development to ensure sensitive and successful integration with the existing urban fabric.

Pg 223 Outer City (Suburbs) Outside of the canal ring, in the suburban areas of the city, in accordance with the guidelines, heights of 3 to 4 storeys will be promoted as the minimum. Greater heights will be considered on a case by case basis, having regard in particular to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity and compliance with all of the performance criteria set out in Table 3.