

**STATEMENT OF CONSISTENCY  
STRATEGIC HOUSING DEVELOPMENT-  
1-4 EAST ROAD, DUBLIN 3**

**BSM**

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Martin**

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CLIENT  
**Glenveagh Living Ltd.**

DATE  
**26<sup>th</sup> April 2019**

## 1-4 EAST RD

Statement of Consistency

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## 1 INTRODUCTION

On behalf of the Glenveagh Living, this Statement of Consistency with Planning Policy has been prepared to accompany a SHD Application to An Bord Pleanála in relation to a proposed strategic housing development at 1-4 East Road, Dublin 3.

The development will consist of the demolition of all structure on the site and the construction of a mixed use development set out in 9 no. blocks, ranging in height from 3 to 15 storeys to accommodate 554 no. apartments, enterprise space, retail units, foodhub/café/exhibition space, residential amenity, crèche and men's shed. The site will accommodate car parking spaces, bicycle parking, storage, services and plant areas. Landscaping will include a new central public space and residential podium courtyards.

This statement of consistency with planning policy has been prepared to specifically address the requirements of the strategic housing development guidance document issued by An Bord Pleanála. This SHD Application is also accompanied by a Planning Report which includes further details in respect of the proposed development in relation to the site location and context, the development description and the relevant planning history.

This standalone planning policy consistency statement, prepared by Brady Shipman Martin, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by OMP Architects, BSM Landscape Architects & Ecologists, DBFL Consulting Engineers, Ethos Engineers, Arup Engineers, ARC Consultants and Element 78.

For further details of consistency with the quantitative standards for residential units as set down in the Sustainable Urban Housing Design Standards for New Apartment Guidelines 2018, the Quality Housing for Sustainable Communities 2008 and the 2016-2022 Dublin City Development Plan, please refer to the ABP SHD Submission Schedules Document prepared by OMP Architects, and the Planning Report included in this SHD Application.

## 2 CONSISTENCY WITH PLANNING POLICY

### 2.1 National and Regional Planning Policy

The key provisions of both national policy (including relevant Section 28 guidelines) and regional planning policy, as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Rebuilding Ireland – Action Plan for Housing and Homelessness
- Project Ireland 2040 - National Planning Framework,
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy (RSES): Draft Strategy (November 2018)
- Regional Planning Guidelines for the Greater Dublin Area (2010 – 2022);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines - Quality Housing for Sustainable Communities;
- Sustainable Urban Housing: Design Standards for New Apartments (2018)
- Design Manual for Urban Roads and Streets (2013);
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)
- The Planning System and Flood Risk Management (2009); and
- Birds and Habitats Directive – Appropriate Assessment;

#### 2.1.1 Rebuilding Ireland – Action Plan for Housing and Homelessness

Rebuilding Ireland is the Government’s Action Plan for Housing and Homelessness, launched in 2016. The Plan’s aim is to accelerate housing supply by addressing the needs of homeless people and families in emergency accommodation, accelerate the provision of social housing, deliver more housing, utilise vacant homes and improve the rental sector.

The Plan contains five key pillars:

- Pillar 1 – Address Homelessness: Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a

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particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.

- Pillar 2 – Accelerate Social Housing: Increase the level and speed of delivery of social housing and other State-supported housing.
- Pillar 3 – Build More Homes: Increase the output of private housing to meet demand at affordable prices.
- Pillar 4 – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.
- Pillar 5 – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible - focusing on measures to use vacant stock to renew urban and rural areas.

The proposed development at East Road is consistent with Pillar 3 and Pillar 4 as the scheme is proposing to construct 554 no. apartments at a highly accessible location in Dublin's Docklands.

#### **2.1.2 Project Ireland 2040 National Planning Framework (Published 16/02/2018)**

Project Ireland 2040 is the Government's plan to 're-imagine' Ireland and prepare for the future. Project Ireland 2040 seeks to achieve ten strategic outcomes (common to both Plans), building around the overarching themes of wellbeing, equality and opportunity, including:

1. Compact Growth
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenity and Heritage
8. Transition to a Low Carbon and Climate Resilient Society
9. Sustainable Management of Water and other Environmental Resources
10. Access to Quality Childcare, Education and Health Services

Project Ireland 2040 contains two key plans: the National Planning Framework (NPF); and the National Development Plan Framework (NDP) which, in tandem, set out infrastructure priorities and plan regional development for the country. The NPF is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The plan identifies that by 2040 it is expected that an additional one million people will live in Ireland, an additional two-thirds of a million people will work here. These are huge increases: more people will be travelling to work, school and universities, more buildings will be needed to accommodate them, clean

water will be needed for homes, farms and industry, more and better care facilities will be required for the elderly.

One of the key objectives of the NPF relates to compact growth. The plan seeks to carefully manage the sustainable growth of compact cities, towns and villages and to add value and create more attractive places in which people can live and work. The NPF identifies that activating '*strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development*' as a top priority.

With regards to Dublin the NPF identifies that the city needs to '*accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice*'.

National Policy Objective 4 in this regards states:

*Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

National Policy Objective 11 in this regards states:

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

National Policy Objective 13 in this regards states:

*In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*

### **2.1.3 Eastern and Midland Regional Assembly – Draft Regional Spatial & Economic Strategy (RSES): November 2018**

The Draft Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the state.

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The Draft Strategy identifies that the region *'is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region'*.

The Draft Strategy is underpinned by key principles that reflect the three pillars of sustainability: Social, Environmental and Economic, and expressed in a manner which best reflects the challenges and opportunities of the Region. The plan identifies that the central need is for the RSES to be people focussed, as 'quality of life' encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located with the Dublin Metropolitan Area, as designated by the Draft Strategy. The Metropolitan Area Strategic Plan (MASP) which is part of the draft RSES seeks to focus on a number of large scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable fashion.

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *'the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. These include; Dublin Docklands.....'* The subject site is located within the Dublin Docklands Strategic Development Regeneration Area (SDRA) under the Dublin City Development Plan 2016-2022.

The Strategy goes on to identify that for the Docklands, the Strategy identifies the build out of North Lotts and Grand Canal Docks SDZ with further physical and social regeneration of Poolbeg and northeast inner-city lands, this would include our subject site.

Policy Objective relating to Housing Delivery include:

*RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'<sup>1</sup> , 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines<sup>2</sup> , and Draft 'Urban Development and Building Heights Guidelines for Planning Authorities'.*

While the subject site is predominantly considered as a residential scheme, in line with the zoning objectives for the site, a significant quantum of employment floorspace is provided for, which is also in line with the objectives of the draft RSES. In regards to the Docklands the employment potential is identified as *'High tech, financial services and people intensive employment and regeneration of*



*underutilised lands*'. The proposed scheme can complement the permitted and existing adjoining larger commercial floorplates in the North Lotts and allow a range of start-up and workspace types for new and emerging business to grow and develop.

#### 2.1.4 Regional Planning Guidelines for the Greater Dublin Area (2010 – 2022)

The Regional Planning Guidelines (RPG) provide for the implementation of the National Spatial Strategy at a Regional level in the Greater Dublin Area (GDA). The Guidelines provide an overall strategic context for the Development Plans of each local authority in the Greater Dublin Area (GDA). The RPGs will be superseded upon the adoption of the RSES however the current Guidelines will continue to have effect until that time.

The subject lands are located in the Metropolitan Area of the GDA. The Dublin Metropolitan Area is targeted for increased development, particularly those lands that are readily acceptable by public transport and roads infrastructure. The Guidelines state that *'development within the existing urban footprint of the Metropolitan Area will be consolidated to achieve a more compact urban form, allowing for the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built-up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike.'*

Specifically to Dublin City the RPGs state the objective of *'focusing of new housing within the existing built up footprint of Dublin City and suburbs within the metropolitan area of Dublin; and that large scale expansion of this footprint only occurring as part of an integrated plan where there are strong linkages between the lands in question and existing or planned high quality public transport creating opportunity and suitability to expand the built up area'*.

The proposed development provides a sustainable high quality residential and employment environment in close proximity to high quality public transport (Luas Red Line, Docklands Rail Station and future Bus Connects Route and Dart Underground Station).

The proposed development is consistent with the policy objectives of the Regional Planning Guidelines and in particular its emphasis on the consolidation of the urban area and the promotion of residential and employment development close to existing services and transport links. The appropriateness of the site for residential and employment development is reflected in the land use zoning objective and the existing pattern of development in the area.

#### 2.1.5 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The aim of these guidelines is to set out the key planning principles which should guide the delivery of residential development in urban areas. The Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed in the section below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

The Guidelines reinforce that planning authorities *'should promote increased residential densities in appropriate locations, including city and larger town centres'* and that *'firm emphasis must be placed by planning authorities on the importance of qualitative standards in relation to design and layout in order to ensure that the highest quality of residential environment is achieved'*.

These qualitative standards have been brought through in the Design Manual as referenced above, the City Development Plan and in the Sustainable Urban Housing: Design Standards for New Apartments (2018) which have guided the design approach of the scheme. This is set out in detail in the accompanying Design Statement prepared by OMP Architects.

In identifying appropriate locations for increased density the Guidelines note that City and town centres offer *'the greatest potential for the creation of sustainable patterns of development'* and of which in particular brownfield sites should be promoted.

Having regard to the above, the Core Strategy of the Development Plan promotes the intensification and consolidation of Dublin City and the Docklands, as identified as Strategic Development Regeneration Area 6 (SDRA). In respect of SDRA 6 the City Development Plan identifies that *'the designation of the Docklands, including the Docklands SDZ, as a strategic development and regeneration area (SDRA) provides for the continued physical and social regeneration of this part of the city, consolidating the area as a vibrant economic, cultural and amenity quarter of the city, whilst also nurturing sustainable neighbourhoods and communities'*.

To maximise the return on public transport investment the Guidelines identify that it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including higher densities – on lands within existing or planned transport corridors- this includes 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station.

The subject site is located on a current bus route (and a future upgraded Bus Connect route) and within 600m walking distance of the Spencer Dock Luas Stop and the Docklands Rail Station.

In respect of pre-application consultations with the Planning Authority and An Bord Pleanála, and in this application for development, the design team has had regard to the advice set down in the 'In Practice' section of the Urban Design Manual (2009).

#### **2.1.6 Urban Design Manual – A Best Practice Guide (2009)**

The Urban Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. These are listed below, with a response to each provided, and should be read in conjunction with the Architect's Design Statement, submitted as part of this application for development.

##### ***Context: How does the development respond to its surroundings?***

The proposed development has been designed to respond positively to the existing established residential communities to the west which is dominated by 2 storey terrace housing, the newer 2 storey housing to the east at Merchant's Square, the higher density 3-8 storey context to the north along East Road, and the emerging context to the south, in the SDZ area.

The layout and the scaling of the site has responded to these residential adjacencies ensuring no impact on residential amenity while at the same time providing a renewed frontage onto East Rd. The proposed scheme provides a marker and transition from the SDZ area to the south.

##### ***Connections: How well is the new neighbourhood / site connected?***

The lands at 1-4 East Road (c. 2.145 hectares) are located immediately to the north of the East Wall Rail Yard in the North Docks area of the city. The lands are accessed from East Road on the western boundary of the site. The eastern boundary of the site abuts Merchant's Square residential development. The southern boundary is constrained by CIE lands. Industrial, commercial, leisure and retail land uses are all present in close proximity.

The subject site presents significant frontage west onto East Road replacing the existing hoarded frontage which does not present an attractive public realm at this location. The new frontage, including active uses and passive surveillance, will provide a more attractive route along East Rd for pedestrians.

The Docklands Quarter has undergone significant regeneration in recent years, however the area from Sheriff Street Upper northwards towards East Road has

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remained largely undeveloped; as a result relative heights and scales of urban grain in the immediate context reflect both prior and emerging patterns of development.

#### ***Inclusivity: How easily can people use and access the development?***

The proposed development will be accessed off an existing access point on East Rd which provides for pedestrian, cycle and car access. The subject site is located on a current bus route (and a future upgraded Bus Connect route) and within 600m walking distance of the Spencer Dock Luas Stop and the Docklands Rail Station. Upgraded footpaths, public realm and cycle routes on East Rd will provide for a more attractive and safer access to the site. The site is within short walking distance of employment, commercial, community and other serviced uses.

Once within the site, vehicles are quickly diverted into podium car parks, or to visitor parking, and pedestrian permeability is via a central public space providing access to each of the individual podium courtyards and access to residential units. The employment space is accessed directly from the public space ensuring an easily navigable environment.

#### ***Variety: How does the development promote a good mix of activities?***

In terms of residential mix, the proposed scheme provides for a good mix of unit types by providing studios, 1-bed, 2 bed and 3- bed units. These units are broken into 9 blocks, each located onto a central raised courtyard, each in turn located around a centralised public space.

The site also provides for a significant quantum of employment space including flexible managed office, co-working, start up space, a foodhub with large kitchens and smaller retail and café uses. This quantum of non-residential development will bring a diversity of users to the site in comparison with a traditional residential development.

The mix of uses and users are focused around the central public space which will ensure a mixing of people, engagement and activity.

#### ***Efficiency: How does the development make appropriate use of resources, including land?***

It is considered that the site, given its scale and location, represents a significantly underutilised brownfield site. The site is located directly adjacent the Docklands SDZ area, significant employment locations, high quality public transport links and walking distance of the City Centre. The site as it is currently occupied provides for essentially a large parking area for logistics vehicles, in addition to some other small enterprises, and employs approximately 14 people on the site.

The scheme as proposed will provide 554 residential units (a population of approx. 1000, based upon an average household occupancy of 1.8 for new development areas in the Docklands), employment capacity for up to approximately 250 people in addition to new retail and community uses.

***Distinctiveness: How do the proposals create a sense of place?***

The scheme as proposed contains a variety and mix of building designs, heights and materials in this established and emerging residential area, in addition to a central open space, which combined, contribute to creating a sense of place on this significant site.

Key buildings such as the taller building onto East Rd, at the railway tracks, will provide visual landmarks for the site as approached from Sheriff St and East Rd transitioning the adjoining development from these areas.

***Layout: How does the proposal create people-friendly streets and spaces?***

The scheme as proposed remakes East Rd along this portion of the street, which has been considered inactive or dead for the previous number of years. The scheme, onto East Rd, provides for an upgraded footpath, on-street parking and cycle route with active uses in retail, cafes and the foodhub to enliven the street.

Within the scheme, the space is primarily pedestrianised around the central public space. Vehicles, once they enter the site, are quickly moved from the road into two undercroft car parks ensuring the primacy of the space as public realm and for the pedestrian.

***Adaptability: How will the buildings cope with change?***

The ground floor employment uses have been designed to meet a wide range of employment users' needs i.e. standard office space, co-working space, startups, artistic spaces, galleries, foodhub etc. This type of design and layout lends itself readily to change if required.

Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size. The development provides a mix of studios 1, 2, and 3, bedroom units that can allow for occupancy as life cycles and personal needs of each resident change.

***Public Realm: How safe, secure and enjoyable are the public areas?***

***Privacy / Amenity: How do the buildings provide a high-quality amenity?***

As the scheme is accessed and used by a number of users i.e. residents, employees, parents dropping off at crèche, shoppers and visitors to both employment and residential, there is significant passive surveillance built into the design and location of these uses.

The central public space will be the key focus of the scheme as it will be accessed by all the users identified above, and will provide the means of access to their

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final destination. As such the space must be attractive, flexible and secure. The employment uses look onto this space and all of the residential blocks have an aspect onto this space.

In terms of the residential amenity spaces, these are at the podium level ensuring a more calm and private space away from the busier central space. Each courtyard has at least one residential block overlooking it and also they provide access ensuring a level of security. The landscape rationale for these spaces has been to provide a range of features to facilitate both active uses i.e. play spaces and more relaxed amenity i.e. seating areas. The design ensures privacy in the spaces but allows for passive security from adjoining blocks and entrances ensuring a sense of security.

#### ***Parking: How will the parking be secure and attractive?***

A total of 248 car parking spaces, including 7 surface car parking spaces and 241 at under podium car parking spaces, are provided within the scheme. The car parking for the apartments are all provided at under podium level. The surface car parking spaces are provided for visitors to the residential and employment uses and crèche drop off.

In addition, 810 no. cycle parking spaces are provided for in the scheme. These spaces are provided for the various users of the scheme including provision for the crèche, and employment, in secure locations. All secure cycle parking is access controlled. All residential and long term users facilities are provided in secure spaces, and more flexible parking is provided in the public realm for short term stays.

#### ***Detailed Design: How well thought through is the building and landscape design?***

The proposed design of the development has been subject to a number of pre-application consultations between the design team and the Planning Authority. The design rationale from an urban design and architectural perspective is explained in the Architectural Design Statement prepared by OMP.

The landscape design rationale is set out in the Landscape Design Statement prepared by BSM. The proposed landscaping arrangement is laid out around a central public space. The central public space provides for informal amenity, public realm, seating and tree planting while the shared residential courtyards provide for amenity and recreation and sense of place.

Full details on the rationale for the landscaping design can be found in the Landscape Design Rationale and Landscape plans prepared by BSM Landscape Architects which accompanies this SHD Application.

### 2.1.7 Sustainable Urban Housing: Design Standards for New Apartments (2018)

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018. The guidelines update previous guidance from 2015 and note that this is done so *in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines.*

The Guidelines note that the NPF projects a need for a minimum of 550,000 new homes, at least half of which are targeted for provision in Ireland's five cities and of particular relevance to this site it notes a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located, which requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope'.

The Guidelines have been updated, from the previous 2015 Guidelines, to amend and address new areas including:

- Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;
- Make better provision for building refurbishment and small-scale urban infill schemes;
- Address the emerging 'build to rent' and 'shared accommodation' sectors; and
- Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.

The subject site represents a significant redevelopment of brownfield lands in the Docklands area of Dublin City and as such represents a project that is fully supported by these Guidelines.

The Guidelines identify Central/Accessible Urban Locations which are suited to higher density development. The subject site falls within this category as it is both a 'Site within walking distance of significant employment centre' and a 'Site within reasonable walking distance to/from high capacity urban public transport stops'. The subject site is located within walking distance of the Docklands SDZ and the IFSC area which is the primary location of economic, banking, legal and tech industries in Ireland. Additionally the site is a 7-8 minute walk to both the Spencer Dock Luas Stop and the Docklands Rail Station (and also future Dart Underground at Spencer Dock).

This SHD Application is accompanied by a Housing Quality Assessment (HQA), prepared by OMP Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the Apartment Guidelines 2018.

The HQA illustrates in tabular format how each apartment within the proposed scheme meets or exceeds the relevant standards as set out in the Guidelines including SPPR3: Minimum Apartment Floor Areas and SPPR 4: Dual Aspect Apartments.

Another key update in the 2018 Guidelines is the ability to reduce car parking standards. The Guidelines identify that *'in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances'*. The scheme as proposed includes for car parking at a rate of 0.41 per unit. This equates to a total of 227 residential spaces for 554 apartment units. The Parking Strategy Report prepared by DBFL, provides a justification for this level of car parking as it relates to the site's accessibility to public transport and employment zones.

With regards to cycle parking, the proposed scheme exceeds the standards as set out in the Dublin City Development Plan and not Section 4.15 of the Guidelines as this is a suggested standard and not an SPPR. The Transport Report equally provides a justification for this level of cycle parking.

#### **2.1.8 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)**

The Urban Development and Building Heights Guidelines identify that as reflected in *'the National Planning Framework .... that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas'* and that *'securing compact and sustainable urban growth means focusing on reusing previously developed 'brownfield' land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities'*.

The Guidelines reference NPO 13 (from the NPF) which states that *'in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions*



*to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected’.*

It recognises that in meeting the challenge set out above, new approaches to urban planning and development are required and that securing an effective mix of uses within urban centres is critical. To bring about this increased density and increased residential development in urban centres the Guidelines state that *‘significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels’.*

The proposed scheme, as set out in this SHD Application to ABP seeks to achieve greater height and density. The site’s suitability for this approach is set out in detail, as considered against the Guidelines in the accompanying Planning Report. It is considered that, the subject site, is a prime example of the type of site anticipated in the Guidelines that can achieve increased building height and resulting increased density, while critically not being a singular use on the site but rather a wholly integrated mixed use environment where people will live and work.

#### **2.1.9 Design Manual for Urban Roads and Streets (DMURS) (2013)**

The Design Manual for Urban Roads and Streets (DMURS), was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The DMURS Compliance Statement, prepared by DBFL Consulting Engineers provides further detail in respect of the compliance of the proposed development with DMURS.

The scheme proposals are the outcome of an integrated urban design and landscaping to create lower traffic speeds through the development and thereby facilitating a safer environment for pedestrians and cyclists. DBFL along with the rest of the design team have interrogated the DMURS principles to ensure the final layout provides a high quality urban extension in proximity to the Docklands.

#### **2.1.10 Guidelines for Planning Authorities on Childcare Facilities (2001)**

Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings.

The proposed development has a total of 554 units with a corresponding requirement for 148 childcare spaces under the 2001 Guidelines. However the

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Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities state that:

*'Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. 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 scheme contains 50% studios and one beds and 42% two beds, which as per the above, the studios and one beds at a minimum should be discounted in the calculation of the requirement.

The proposed development will provide for a crèche of approx. 540 sq.m with an indicative layout of the space providing for approximately 65 no. child spaces which, taking account of the above Guidelines is considered to adequately meet the requirement generated by the proposed development.

In addition there are a number of existing and permitted crèches in the adjacent area. These are set out in both the Planning Report and the Community & Infrastructure Audit accompanying this application.

#### **2.1.11 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020**

The Smarter Transport objective contained within Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 outlines the Government vision that the key goals to achieve transport sustainability are:

- i) to reduce overall travel demand
- ii) to maximise the efficiency of the transport network
- iii) to reduce reliance on fossil fuels
- iv) to reduce transport emissions and
- v) to improve accessibility to transport

The key targets that the Smarter Travel Policy sets to achieve these goals area:

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total

commuter journeys to work The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels

- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

The subject site encourages sustainable and smarter travel by providing high density development on brownfield lands in close proximity to the City Centre and key employment zones, is proximate to existing high capacity public transport routes and through the reduction in car parking and significant cycle facilities.

#### **2.1.12 Transport Strategy for the Greater Dublin Area 2016 – 2035**

The Transport Strategy for the Greater Dublin Area 2016 – 2035, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

The Strategy identifies the challenges for transport in the GDA as being:

- An assumed return to sustained economic growth;
- Substantial population growth;
- Full employment;
- That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and
- That the environment in the GDA is protected and enhanced.

It is considered that since the publication of the Strategy in 2016 economic and population growth has continued to substantially increase and as such the objective of the plan are critical to ensuring a functional GDA region.

As such the proposed development is consistent with the objectives of the GDA Transport Strategy by developing employment and residential development in proximity to each other and proximate to existing employment and public transport networks thereby reducing the requirement on the car and encouraging a shift to more sustainable transport methods.

#### **2.1.13 Guidelines for Planning Authorities on 'The Planning System and Flood Risk Management (November 2009)'**

These Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process. In accordance with the Planning System and Flood Risk Management Guidelines a Site-Specific Flood Risk Assessment (SSFRA) has been prepared for the current

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application by DBFL Consulting Engineers. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

This Site Specific Flood Risk Assessment for the proposed office development at East Road was undertaken in accordance with the requirements of the “Planning System and Flood Risk Management Guidelines for Planning Authorities”, November 2009.

The development passes the Justification Test in accordance with Box 5.1 of the Guidelines and the proposed development is deemed appropriate to be located within Flood Zone A on the basis that the mitigation measures stipulated within the justification are met.

#### 2.1.14 Birds and Habitats Directive – Appropriate Assessment

Under Article 6(3) of the EU Habitats Directive and Regulation 30 of SI no. 94/1997 European Communities (Natural Habitats) Regulations (1997) any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000-2010.

An Appropriate Assessment is required if likely significant effects on Natura 2000 sites arising from a proposed development cannot be ruled out at the screening stage, either alone or in combination with other plans or projects.

We refer the Planning Authority to the Appropriate Assessment Screening Report prepared by Brady Shipman Martin that accompanies this application which concludes that no likely significant impacts on Natura 2000 sites are predicted. The information contained in this planning application and AA Screening Report seeks to assist the competent authority (in this instance An Bord Pleanála) to undertake a Screening for Appropriate Assessment.

## 2.2 Local Planning Policy

This section provides an overview of consistency with Local Planning Policy which is the Dublin City Development Plan 2016. As the site sits adjacent to the North Lotts and Grand Canal Dock Strategic Development Zone Planning Scheme (2014) reference to the wider objectives of this scheme are also referenced.

### 2.2.1 Dublin City Development Plan 2016-2022

The subject site is located within the administrative area of Dublin City Council. The Dublin City The Dublin City Development Plan 2016-2022 sets the statutory planning policy for development within the City Boundary, having regard to national and regional plans and policies. The Development Plan provides the

planning policy framework and design and development standards for development of the subject lands. These are set out as follows:

### **Core Strategy & Zoning Objective**

The Core Strategy of the Development Plan promotes the intensification and consolidation of Dublin City and the Docklands is identified as Strategic Development Regeneration Area 6 (SDRA). In respect of SDRA 6 the City Development Plan identifies that *'the designation of the Docklands, including the Docklands SDZ, as a strategic development and regeneration area (SDRA) provides for the continued physical and social regeneration of this part of the city, consolidating the area as a vibrant economic, cultural and amenity quarter of the city, whilst also nurturing sustainable neighbourhoods and communities'*.

The SDRA for the Dublin Docklands covers three areas, 1. Docklands Area (which includes the subject site), 2. Strategic Development Zone, and 3. Poolbeg West.

The objectives for 'Docklands Area' is for regeneration focussed on social and community and not just physical and economic. This accords with the site zoning objective which is Z14 the stated objective of which is to *"to seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and "Z6" would be the predominant uses"*.

The Z6 zoning aims to provide for enterprise and facilitate opportunities for employment creation. As such, both employment and residential uses are considered permissible with Z14 zoning making the principle of the proposed development acceptable.

While the residential element of the scheme is the predominant use, it is considered the quantum of employment, retail etc. uses, is both appropriate to the site and represents a significant employment increase on the current site use. The employment hub represents a total area of 2444 sq. which equates to an employment potential of 250 persons. Additional to this is the retail uses, foodhub/café/exhibition space and crèche which have further employment potential.

This mix of residential and significant employment will ensure the site operates on a truly mixed use basis, providing opportunities for residents work on site and for integration into the established community through the relocation of the men's shed, the foodhub and enterprise/start up space.

The SDRA for the 'Docklands Area' within which the subject site is located, contains a substantive number of objectives, of which those relevant are set out below:

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#### Housing

- *To ensure a holistic approach to housing that will achieve successful integration of residents, neighbours and the wider community.*
- *To promote the expansion of the Docklands' residential population, cater for life-cycle requirements of the existing population and provide recreational facilities for children across a range of ages.*
- *To achieve successful interaction between the SDZ scheme and surrounding streets and public realm to retain and foster a strong sense of neighbourhood within communities*
- *To ensure that residential developments optimise the unique Docklands character in terms of visual context, maritime location, heritage assets and community identity*
- *To provide physical, social and amenity infrastructure in tandem with new housing.*
- *To safeguard residential amenity and to ensure appropriate transition in scale, the design of new development shall have regard to the context, setting and amenity of existing housing within the SDZ and wider Docklands area*
- *To ensure that all proposals for residential development meet the obligations under Part V and Dublin City Council's housing strategy. The City Council will pro-actively seek the delivery of social housing units on site within the Docklands area, where appropriate having regard to the range of options for delivery of social housing available to applicants under Part V; the need to counteract undue segregation in housing between persons of different social backgrounds; whether the proposal would constitute the best use of resources to ensure an adequate supply of housing and the financial implications for the Council in its functions as a housing authority; as well as government policy on the provision of social housing*
- *To recognise the important role of approved housing bodies in social housing provision and that the voluntary and co-operative model can achieve mixed tenure communities through the provision of housing for market sale, private and social rental*
- *To promote a programme of support housing in conjunction with housing agencies (see also Appendix 3 – Housing Strategy)*
- *To encourage 'own front doors' and defensible open space as far as practicable*

#### Employment

- *To encourage local employment, where the appropriate skills are available, on all construction projects in the Docklands area*
- *To maximise the employment generating opportunities of the support services sector including the local enterprise office under Dublin City Council, as well as enterprise activity with a range of key skilled, semi-skilled and unskilled workers as part of the overall economic regeneration of the Docklands area*
- *To explore new opportunities for local employment in conjunction with the construction sector, corporate sector and other key stakeholders through the Community and Social Development Plan for the Docklands area*

## Social

- *To pro-actively engage and re-integrate the Docklands community with the full spectrum of Dublin City Council services, with particular regard to the Council's community services which include children and young people, community development, social inclusion and interculturalism, community and voluntary, as well as public private partnerships of socio-economic interests*
- *Dublin City Council as Development agency for the SDZ Area will fulfil this coordinating role to continue the important work of social regeneration in the wider Docklands area*
- *To ensure that social and community facilities, in particular educational facilities, are provided in tandem with residential development, having regard to the over-arching social audit of community infrastructure to be undertaken by Dublin City Council for the entire Docklands Area and the supporting social audits and community infrastructure statements to accompany proposals for large scale developments (200 Units/20,000 sq. m mixed-use)*
- *To ensure that social infrastructure is inclusive, caters for the needs of all the community, is accessible and available to all sectors including the existing community of the historic neighbourhoods and the emerging residential and working communities that have a mixed international profile, and represents the optimum use value of public investment*
- *That all new developments in the Docklands area, North Lotts and Grand Canal Dock and Poolbeg West will provide for a minimum of 5% allocation of space in the development to be used for social, cultural, creative and artistic purposes.*

## Economic

- *Dublin's economic performance is essential to the success and competitiveness of the national economy. As the engine of the national economy, Dublin needs to develop a sufficient critical mass to compete at an international level. The Docklands area has the potential to fulfil this strategic role as a global economic hub.*
- *Continuing the approach of the Docklands 2008 Master Plan – that the successful development of Docklands is driven by the objective of Docklands as a great place to do business, work and visit – the guiding principles below focus on the direct and indirect sectors that drive economic activity and support a vibrant urban environment in Docklands:*

## Business

- *To promote the Docklands as a location for sustainable businesses, and to encourage contact with the Local Enterprise Office, under Dublin City Council*
- *To promote the development of retail use to serve the existing residential community, new residents and visitors*
- *To promote the development of sufficient retail facilities to serve the needs of the population living, working and visiting the Docklands Area*
- *Issues such as movement, land-use, urban design and flood risk management are important environmental matters for the Docklands area. In terms of movement, the significant potential of walking and cycling is recognised and future initiatives will focus on sustainable modes of travel and greater integration with the wider city transport network.*

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- *On land-use, a balanced mixed-use approach is critical to achieving good place-making and a high-quality public realm, with a residential component key to creating a sense of place and community. Meanwhile, flood prevention and management will play an increasingly important role in terms of new infrastructure provision, flood-resilient design and maintenance regimes to prevent the occurrence of flooding in the Docklands area.*

### Movement/Transport

- *To support sustainable transport initiatives which facilitate pleasant, accessible and easy movement to, from and within the Docklands area*
- *To develop an integrated transport strategy for the entire Docklands area and to pro-actively promote sustainable smarter travel*

### Land-Use/Urban Design

- *To continue to secure the distribution of residential use throughout the Docklands area by requiring an appropriate residential/commercial land-use mix on key development sites*
- *To ensure that the public realm in the Docklands area operates as a connected network of social spaces and creates a unique sense of place*
- *To use street furniture, informal spaces, pocket parks, civic spaces and the spaces between buildings and to promote opportunities for increased interaction and mobility within the Docklands*

It is considered that the scheme as presented, embraces and responds to the objectives of the SDRA for the Docklands and *provides for the continued physical and social regeneration of this part of the city, consolidating the area as a vibrant economic, cultural and amenity quarter of the city, whilst also nurturing sustainable neighbourhoods and communities’.*

### Residential Development

The Development Plan identifies that the provision of quality homes which provide for the needs of the city’s population and which contribute to the making of good, connected neighbourhoods as a key priority. In this regard it is the policy of DCC:

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

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

The Development further notes that, in Dublin City, it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. With regards apartments, the DCC policies area as follows:



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

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

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

The proposed scheme provides for high quality residential accommodation close to the City Centre and the mixed use Docklands Hub. The site provides well designed external spaces for both residents, employees and visitors to the site, with a wide range of facilities in the foodhub/café/exhibition space, local retail and crèche.

### **Height**

The Development Plan Height Strategy identifies a building height of 24m for residential development in this location. However it is submitted that the context for increased height goes beyond the specific height limits set out in the Development Plan and should be considered in the context of the wider height policies. The Urban Development and Building Heights Guidelines establish the principle for the re-examination of the height limits (as outlined in Section 2.1.8) and that these take precedence over the Development Plan height limits on a context basis.

The Development Plan states that the:

*‘clustering of taller buildings of the type needed to promote significant densities of commercial and residential space are likely to be achieved in a limited number of areas only. Taller buildings (over 50m) are acceptable at locations such as at major public transport hubs, and some SDRAs. For example, the North Lotts and Grand Canal Dock SDZ planning scheme provides for a limited number of tall buildings at Boland’s Mills, the Point, Spencer Dock Square and Britain Quay.’*

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*‘There are also a few areas where there are good transport links and sites of sufficient size to create their own character, such that a limited number of mid-rise (up to 50m) buildings will help provide a new urban identity. These areas of the city are the subject of a local area plan, strategic development zone or **within a designated SDRA**’ [our emphasis].*

The Core Strategy of the Development Plan promotes the intensification and consolidation of Dublin City and the Docklands is identified as Strategic Development Regeneration Area 6 (SDRA). In respect of SDRA 6 the City Development Plan identifies that *‘the designation of the Docklands, including the Docklands SDZ, as a strategic development and regeneration area (SDRA) provides for the continued physical and social regeneration of this part of the city, consolidating the area as a vibrant economic, cultural and amenity quarter of the city, whilst also nurturing sustainable neighbourhoods and communities’.*

The SDRA for the Dublin Docklands covers three areas, 1. Docklands Area (which includes the subject site), 2. Strategic Development Zone, and 3. Poolbeg West.

The SDRA objectives for the ‘Docklands’ as a whole include:

- *To achieve successful interaction between the SDZ scheme and surrounding streets and public realm to retain and foster a strong sense of neighbourhood within communities.*
- *To ensure that residential developments optimise the unique Docklands character in terms of visual context, maritime location, heritage assets and community identity.*
- *To safeguard residential amenity and to ensure appropriate transition in scale, the design of new development shall have regard to the context, setting and amenity of existing housing within the*
- *SDZ and wider Docklands area*
- *The Government’s designation of the SDZ reflects a keen awareness of the strategic importance of this area. However, it is acknowledged that to facilitate the continued socio-economic regeneration of the wider Docklands area, there is a need to address areas beyond the SDZ Boundary*

The East Rd site sits as a transition between the ‘SDZ’ and the ‘Docklands Area’ as identified in the Development Plan and adjacent an existing 12 storey building permitted prior to, but outside of the DDDA/SDZ area. Consideration of height is attributable to the entire SDRA.

### Residential Development Standards- Apartments

Section 16.10.1 of the Dublin City Development Plan 2016 – 2022 sets out the standards for apartments which are based upon the apartment standards set out in the Department of Environment, Community and Local Government Guidelines entitled Sustainable Urban Housing; Design Standards for New

Apartments – Guidelines for Planning Authorities (December 2015). These are in parts superseded by the Updated Guidelines of 2018 (as outlined earlier in this document).

The Housing Quality Assessment, prepared by OMP Architects submitted with this SHD Application, as well as the Planning Report, sets out detailed compliance with the guidelines for apartment standards.

### **Part V – Social Housing**

The City Development Plan identifies as a policy:

*To secure the implementation of the Dublin City Council Housing Strategy in accordance with the provision of national legislation. In this regard, 10% of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/ or affordable housing in order to promote tenure diversity and a socially inclusive city.*

The proposed scheme has been designed in a manner to ensure an appropriate mix and location of Part V units. This has been discussed with Dublin City Council and agreed as an acceptable proposal.

## **3 CONCLUSION**

The statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context.

At a national and regional level, this statement and accompanying submission documentation has demonstrated the consistency of the proposed development with National and Local Planning Guidelines and Policy as outlined in this report.

Consistency with the policies and provisions of the Dublin City Council Development Plan 2016-2022, which is the key planning policy document at a local level, is also demonstrated within this report.

It is respectfully submitted that the proposed development will provide an appropriate form of high quality residential and employment development for this under-utilised, brownfield site. This Statement of Consistency, accompanying this SHD Application, demonstrates that the proposed development is consistent with the national, regional and local planning policy framework, and that the proposal will provide for an effective and efficient use of this brownfield urban site which is highly accessible and well served by public transport.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area,

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and with all relevant national, regional and local planning policies and guidelines and that the proposal as presented should be approved by An Bord Pleanála.