

Statement of Consistency with National, Regional & S.28 Ministerial Guidelines

Proposed Strategic Housing Development 'The Connolly Quarter'
Rear of Connolly Station, Sheriff Street Lower, Dublin 1

October 2019



Document Control Sheet

Client	Oxley Holdings Ltd.			
Project Title	The Connolly Quarter			
Document Title	SoC with National, Regional & S.28 Guidelines			
Document No.	3685			
Document Comprises	DCS 1	TOC 1	Text 40	Appendices 0
Prepared by	PG	Checked by	JK	

Rev.	Status	Issue Date
A	FINAL	14.10.2019

Table of Contents

1. Introduction	4
1.1 Purpose of Statement of Consistency	5
2 Description of Development	6
3 National Planning Policy & Section 28 Guidelines	8
3.1 Project Ireland 2040: National Planning Framework (2018).....	8
3.2 Sustainable Urban Housing: Design Standards for New Apartments (2018).....	17
3.3 Urban Development and Building Heights: Guidelines for Planning Authorities (2018)....	21
3.4 Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)	26
3.5 Design Manual for Urban Roads and Streets (2013).....	27
3.6 Sustainable Residential Development in Urban Areas (2009)	30
3.7 Urban Design Manual – A Best Practice Guide (2009)	34
3.8 Childcare Facilities Guidelines for Planning Authorities (2001).....	40
3.9 Architectural Heritage Guidelines (2011).....	41
4 Regional Planning Policy	42
4.1 Eastern & Midland Regional Spatial & Economic Strategy 2019-2031.....	42
5 Conclusion	44

Table of Figures

Figure 1 Development Agreement Site.....	4
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Table of Tables

Table 1 - Residential unit breakdown	7
Table 2 Minimum Floor Areas	17
Table 3 Units per Core.....	18
Table 4 Private & Communal Amenity	19

1. Introduction

This Statement of Consistency (SoC) has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Oxley Holdings Limited who intend to apply for permission for a Strategic Housing Development (SHD) 'The Connolly Quarter' on a site of 2.88 hectares adjacent to the rear of Connolly Station, Sheriff Street Lower, Dublin 1.

The site benefits from extant planning permission for a high-density mixed-use development and as such the principle of the type of development proposed in this SHD application is established.

The SoC has been prepared in collaboration with members of the appointed Design Team; RKD Architects, O'Connor Sutton Cronin Consultant Engineers, Clare Hogan Conservation Architect, Bernard Seymour Landscape Architects, Homan O'Brien Associates, IES and Openfield Ecology.

This report should be read in conjunction with the **Planning Statement & Statement of Consistency with the Dublin City Development Plan 2016-2022** prepared by McCutcheon Halley Chartered Planning Consultants which provides an analysis of the proposed scheme's consistency with the relevant development Plan, the Dublin City Development Plan 2016-2022.

The SoC concludes that the proposed development is consistent with national, regional and local planning policy and relevant s.28 Guidelines.

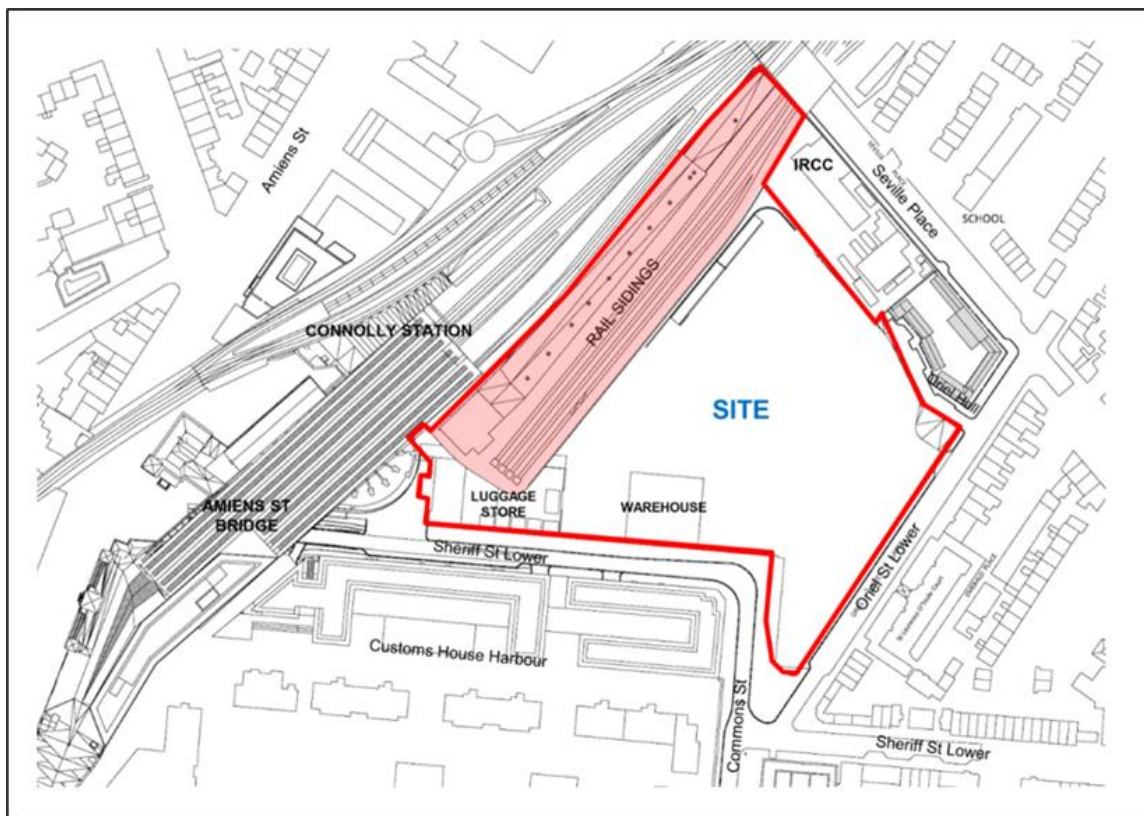


FIGURE 1 DEVELOPMENT AGREEMENT SITE

1.1 Purpose of Statement of Consistency

The purpose of a “Statement of Consistency” is to demonstrate that this proposed development is consistent with the relevant planning policy at national, regional and local levels and relevant guidelines issued by the Minister under section 28 of the Planning and Development Act of 2000(as amended).

The following plans were considered relevant to the proposed development;

- Project Ireland 2040, National Planning Framework (2018)
- Eastern and Midlands Regional Spatial and Economic Strategy (2019)
- Dublin City Development Plan 2016-2022 (please refer to Planning Statement)
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018)
- Urban Development and Building Heights - Guidelines for Planning Authorities (2018)
- Design Manual for Urban Roads and Streets (2013)
- Architectural Heritage Protection - Guidelines for Planning Authorities (2011)
- Sustainable Residential Development in Urban Areas - Cities, Towns & Villages (2009)
- Urban Design Manual – A Best Practice Guide (2009)
- Childcare Facilities Guidelines for Planning Authorities (2001)

For full details of consistency with the quantitative standards for residential units please refer to the **Housing Quality Audit** prepared by RKD Architects that accompanies this application under separate cover.

2 Description of Development

Oxley Holdings Limited are lodging a strategic housing development (SHD) application to An Bord Pleanála for permission for development of a 2.88-hectare site to the rear of Connolly Station, Sheriff Street Lower Dublin 1. The development will comprise;

- i. the demolition of 4 no. structures with a combined gross floor area of 3,028sq.m;
- ii. the construction of 741 no. Build to Rent (BTR) residential units in 8 no. apartment blocks ranging in height from 4 storeys to 23 storeys with a cumulative gross floor area of 68,535sq.m comprising;
 - a. Block B1 (maximum building height 54.917m, total gross internal floor area 11,260sq.m, Apartment Mix: Studio: 25, 1-bed: 37, 2-bed: 51);
 - b. Block B2 (maximum building height 54.917m, total gross internal floor area 10,831sq.m, Apartment Mix: Studio: 20, 1-bed: 35, 2-bed: 51,);
 - c. Block B3 (maximum building height 51.767m, total gross internal floor area 9,766sq.m, Apartment Mix: Studio: 22, 1-bed: 60, 2-bed: 27, 3-Bed: 1);
 - d. Block C1 (maximum building height 79.450m, total gross internal floor area 12,705sq.m, Apartment Mix: Studio: 84, 1-bed: 40, 2-bed: 41);
 - e. Block C2 (maximum building height 39.615 m, total gross internal floor area 4,890 sq.m, Apartment Mix: Studio: 9, 1-bed: 33, 2-bed: 3, 3-Bed: 4);
 - f. Block C3 (maximum building height 39.650 m, total gross internal floor area 6,775sq.m, Apartment Mix: Studio: 40, 1-bed: 18, 2-bed: 23);
 - g. Block D1 (maximum building height 53.392 m, total gross internal floor area 8,418 sq.m, Apartment Mix: Studio: 10, 1-bed: 25, 2-bed: 44, 3-Bed: 1);
 - h. Block D2 (maximum building height 30.950 m, total gross internal floor area 3,890 sq.m, Apartment Mix: Studio: 18, 1-bed: 8, 2-bed: 11);
- iii. residential support amenities including 1 no. gyms, a resident's lounge, work areas, meeting rooms, dining rooms, recreational areas with a combined GFA of 1,444 sq.m;
- iv. change of use from club house to pedestrian passageway of the existing vault (137sq.m GFA) fronting Seville Place, a Protected Structure (RPS No. 130);
- v. a basement of 7,253.4 sq.m with a new vehicular access from Oriel Street Upper incorporating residents' car parking (58 no. spaces), residents cycle parking (640 no. spaces) 7 no. plant rooms (combined 2,228sq.m), waste management facilities (393 sq.m)
- vi. 766 no. covered cycle parking spaces for residents and visitors, concierge office (233 sq.m) and waste management facilities (126 sq.m);
- vii. 'other uses' including 10 no. units providing retail, commercial, and community use with a combined GFA of 3,142 sq.m;
- viii. A total of 18,562 sq.m of hard and soft landscaping comprising a c.2,000 sq.m public plaza and other public/communal and private open space located throughout the development;
- ix. A service and emergency vehicle only access ramp from the Oriel Street Upper site entrance to serve CIE's transport needs at Connolly Station;
- x. Enabling works of a non-material nature to safeguard the existing vaults (Protected Structures - RPS No. 130) that form part of the subject site fronting Sherriff Street Lower, Oriel Street Upper, and Seville Place during the construction phase;
- xi. All associated ancillary development works including drainage, 6 no. electricity substations, pedestrian access; and
- xii. Works to the Masonry wall fronting Oriel Street and the Vaults fronting Seville Place (both a Protected Structure) consisting of the creation of a new vehicular and pedestrian entrance.

This flagship ‘Built to Rent’ scheme will regenerate this site which is predominately used for surface level car parking into an environmentally sensitive, high-quality and sustainable development.

The total number and mix of units are set out in **Table 1**.

Building Ref.	Studio	1-Bedroom	2-Bedroom	3-Bedroom	Total
B1	25	37	51	-	113
B2	20	35	51	-	106
B3	22	60	27	1	110
C1	84	40	41	-	165
C2	9	33	3	4	49
C3	40	18	23	-	81
D1	10	25	44	1	80
D2	18	8	11	-	37
Total	228	256	251	6	741

TABLE 1 - RESIDENTIAL UNIT BREAKDOWN

The proposed design includes residential support amenities distributed throughout the blocks including; a gymnasium, a resident’s lounge, work areas, meeting rooms, dining rooms and recreational areas.

A new urban square, ‘Connolly Square’ of c.2,000 sq.m is proposed together with a hierarchy of new streets connecting at ground level.

Communal residential open space is located at the first floor ‘Highline’¹ level and connects Blocks B, C and D1. Private residential open space is offered at fourth floor (Block B roof courtyards) and at roof terrace levels to Blocks B1, B2, B3, C1, C2, C3 and D1. The following is a breakdown of communal and private open space provision;

- i. ‘Connolly Square’, a new urban square at street level;
- ii. A ribbon of communal open spaces connecting each of the blocks;
- iii. Roof courtyards located within Blocks B, C and D1. These courtyards, located on the 4th floor are designed as semi-private residential courtyards with the landscape amenity to be shared by the residents within Blocks B1, B2 and B3; and,
- iv. Rooftop Gardens on all blocks. The rooftop amenity offers optimum daylight and sunlight conditions plus panoramic views of the city. There is private access for residents within each block to the rooftop gardens.

Taking into consideration the well-connected location of the site in terms of proximity to a variety of public transport options, coupled with the site’s location within walking distance of a range of employment opportunities and the city centre, 58 no. car club spaces are proposed to serve the future occupants. Spaces will not be assigned to individual tenants or individual apartments.

Car parking is not proposed for the retail, community and amenity elements of the development as they are considered to be ancillary and to serve local needs and those residing/working at the development.

To support a modal shift, 1,406 bicycle parking spaces are provided with 640 no. at basement level and 766 no. covered spaces at ground level.

¹ Communal open space connecting all proposed residential blocks at 1st floor level.

3 National Planning Policy & Section 28 Guidelines

This section of the report addresses the following policy and guidelines;

- Project Ireland 2040 National Planning Framework (2018)
- Sustainable Urban Housing: Design Standards for New Apartments (2018)
- Urban Development and Building Heights: Guidelines for Planning Authorities (2018)
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)
- Design Manual for Urban Roads and Streets (2013)
- Sustainable Residential Development in Urban Areas (2009)
- Urban Design Manual – A Best Practice Guide (2009)
- Architectural Heritage Guidelines (2011)
- Childcare Facilities Guidelines for Planning Authorities (2001)

3.1 Project Ireland 2040: National Planning Framework (2018)

Policy Objective	Policy Provision	Statement of Consistency
2a	A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.	✓ The proposed development is located within one of the five cities, in inner Dublin City.
3a	Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements.	✓ The proposed development is located on a brownfield inner city site, and so is in accordance with Objective 3a.
3b	Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.	✓ The proposed development is located on a brownfield inner city site, and so is in accordance with Objective 3b.
4	Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.	<p>✓ The proposed development will create a high-quality residential development which integrates with the existing established residential communities of the Docklands.</p> <p>✓ The proposed development will provide a hierarchy of open spaces and landscape greening in an area of the city that is lacking in these facilities.</p> <p>✓ The proposed development will meet the needs of workers in the Docklands and city centre areas where currently there is an undersupply of rental accommodation. The residential areas adjacent to the site are typified by large-</p>

Policy Objective	Policy Provision	Statement of Consistency
		<p>scale public sector housing estates and blocks.</p> <p>✓ The proposed development is accompanied by a Masterplan, Design Statement, Daylight study, Wind study, Traffic Impact Assessment all aimed at demonstrating the quality of the buildings and residential environment being created.</p>
5	<p>Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.</p>	<p>✓ The proposed development will add to the densification of Dublin city centre and maximise utilisation of public transport. It will create a new city centre quarter where currently there is under-utilised land.</p>
6	<p>Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.</p>	<p>✓ The existing brownfield site is cut-off from the surrounding area being enclosed by a continuous wall along Sheriff Street Lower, Oriel Street and Oriel Hall with Connolly Station to west. This application proposes opening the site through the creation of connections to Sheriff St Lwr, Oriel St Upper, Commons St and Seville Place. The insertion of a high-density residential scheme will rejuvenate the area bringing a level of activity that is currently absent.</p>
7	<p>Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on inter alia:</p> <ul style="list-style-type: none"> • Dublin • Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; • Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes; 	<p>✓ The proposed development is located on an inner-city brownfield site proximate to centres of employment.</p> <p>✓ The site's zoning facilitates tall buildings (50m+) and is appropriate for high density development.</p> <p>✓ The proposed development is adjacent to a high capacity multi-modal public transport interchange and will help to reduce car dependence in the city centre.</p>

Policy Objective	Policy Provision	Statement of Consistency
	<ul style="list-style-type: none"> In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth. 	
8	To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out for Dublin of an increase in population of approximately 20-25% (or 235,000 - 293,000 people) by 2040.	<ul style="list-style-type: none"> ✓ The proposed development will provide high density residential development that will facilitate an increase in the population of Dublin city.
11	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.	<ul style="list-style-type: none"> ✓ This proposal seeks permission for a net density of 257 units/ha on a brownfield site which will generate a population of c.1,430 at a confluence of public transport (rail, LUAS and bus). ✓ The additional population will lead to strengthening of jobs and activity within the area through the knock-on effect on services and facilities within the existing urban area and therefore satisfies objective 11.
13	In urban areas, planning and related standards, including 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.	<ul style="list-style-type: none"> ✓ The proposed development ranges in height from 30.95m above ground level (AGL) to 79.45m AGL i.e. 4 storeys to 23 storeys. Connolly is identified in the City Development Plan as a location that is capable of accommodating high rise (50m+). The proposed heights are consistent with emerging trends for development in the area. ✓ The application is supported by a comprehensive suite of assessments assessing the development against performance-based criteria. ✓ The landscape and visual impact assessment concludes that the effects are assessed as positive since (a) they are supported by policy, and (b) the proposal exhibits an understanding of and appropriate response to the sensitivities and opportunities presented by the townscape context. No further mitigation

Policy Objective	Policy Provision	Statement of Consistency
		<p>measures other than those incorporated in the design are proposed.</p> <ul style="list-style-type: none"> ✓ In terms of access to amenity space sunlight 68% of the amenity areas in the development as a whole receive more than 2 hours of sunlight on March 21st, the Proposed Development exceeds the Building Research Establishment (BRE) recommendations. ✓ In terms of shading on surrounding properties, the impact of the proposed development is almost identical to that from the extant permission. The study concludes that some properties on surrounding streets be impacted. This is an inner-city opportunity site and its development for high-density and high-rise is supported at national policy level. The benefits of developing the site are wide-ranging and the type and form of development is consistent with emerging trends to ensure consolidation of the urban footprint and efficient use of land and is in the interest of the common good. ✓ Carparking is minimised on site and 58 no. parking spaces are proposed. This is appropriate given the site's inner-city location and its proximity to a range of public transport options together with employment opportunities within walking distance of the site.
26	Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy.	<ul style="list-style-type: none"> ✓ The site is located within the inner city close to city's financial services area and a wide range of employment opportunities. Approximately 1,400 people will be accommodated at the site within walking distance of employment opportunities.

Policy Objective	Policy Provision	Statement of Consistency
		<ul style="list-style-type: none"> ✓ A gym and fitness rooms are included in the proposed development to encourage future occupants to live active lifestyles.
27	<p>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.</p>	<ul style="list-style-type: none"> ✓ The proposed development is a city centre site that will generate increased pedestrian and cycling activity. The result will be safer streets and open areas with increased passive surveillance providing a deterrent to anti-social behaviour. ✓ Permeability is central to the design and in this regard, it is proposed to create new pedestrian links to Sheriff Street Lower, Oriel Street Upper, Commons Street and Seville Place. ✓ 1406 no. cycle parking spaces are proposed for future occupants and visitors.
28	<p>Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.</p>	<ul style="list-style-type: none"> ✓ The proposed development provides for studios, 1 bed, 2 bed and 3 bed units, that will cater for a range of household sizes. ✓ The Applicant will comply with their Part V obligations and deliver 75 no. social and affordable housing units. ✓ Communal open space is located at the first floor ('Highline') level, above the public street level, and is arranged to offer full connectivity between all the residential blocks. ✓ The scheme incorporates both residential support amenities together with retail, commercial and community uses. ✓ The proposed development is Part M compliant and thus

Policy Objective	Policy Provision	Statement of Consistency
		includes access for people with disabilities.
31	<p>Prioritise the alignment of targeted and planned population and employment growth with investment in:</p> <ul style="list-style-type: none"> The provision of early childhood care and education (ECCE) facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations. 	<p>✓ The Docklands Social Infrastructure Audit Review 2017 in its recommendation's states that a review of primary and secondary schools is not required until substantial completion of the North Lotts and Poolbeg SDZ's.</p> <p>✓ This application is accompanied by a Childcare Assessment, it concludes that based on existing childcare capacity within a 1km zone of influence, permitted childcare facilities and the demographic profile of the area, there is no requirement for a childcare facility within the proposed development.</p>
32	Target the delivery of 550,000 additional households up to 2040.	✓ The proposed development will contribute 741 no. new households to the target.
33	Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.	✓ The proposed development provides 741 units on a brownfield site at a confluence of high capacity public transport options and adjacent to the Docklands development area.
34	Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	<p>✓ There is a deficit in accommodation suitable for the mobile population that work in the area. This is evidenced by the high number of people who commute into the area daily. The proposed development responds to this deficit.</p> <p>✓ The proposed development is designed with a Universal Design Approach i.e. so that they can be readily accessed and used by everyone, regardless of age, size ability or disability</p> <p>✓ The proposed development is Part M compliant.</p>

Policy Objective	Policy Provision	Statement of Consistency
35	Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.	<ul style="list-style-type: none"> ✓ The proposed development is an infill development, designed to maximise density and height, make the most efficient use of inner-city land, public transport investment and utilisation, and increasing the proportion of people living in apartment type accommodation.
52	The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.	<ul style="list-style-type: none"> ✓ The proposed development is designed to the nearly zero energy building (NZEB) standard at a high level of energy efficiency minimising the use of natural resources (energy and water). NZEB compliant buildings generally achieve a BER of A2-A3. ✓ The application is accompanied by an EIAR that demonstrates overall post-mitigation the residual impact of the proposed development is not significant. While there will be some impact in terms of over-shadowing on some surrounding properties in the context of providing sustainable communities and in the interest of the common good this is deemed acceptable. ✓ Irish Water has confirmed the feasibility of the scheme in terms of potable water supply and foul water discharge.
54	Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.	<ul style="list-style-type: none"> ✓ The proposed development is designed to the nearly zero energy building (NZEB) requirements meaning that the buildings have a very high energy performance. ✓ The drainage system includes an allowance for climate change and SuDS in the form of green roofs, blue roofs, petrol interceptors, attenuation and flow controls are integrated into the design.

Policy Objective	Policy Provision	Statement of Consistency
56	Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.	<ul style="list-style-type: none"> ✓ The proposed development will incorporate adequately sized waste management facilities within the basement that will promote source segregation of waste streams i.e. organics, recyclable and residual waste.
57	<p>Enhance water quality and resource management by:</p> <p>Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.</p>	<ul style="list-style-type: none"> ✓ A Site-Specific Flood Risk Assessment accompanies this application. the site is within Flood Zone A/B for fluvial and tidal flooding and is in a defended area. Development works will not lead to a loss of active functional floodplain storage. Residual risk is mitigated by provision of Highly Vulnerable development uses above the recommended minimum of 4.0mAOD with a high-level walkway for access/egress.
60	Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.	<ul style="list-style-type: none"> ✓ The site's industrial past is recognised in the proposed development. ✓ Entrances are proposed through the existing Sheriff Street arches. ✓ The site entrance at Commons Street/Sheriff Street is and Oriel Street incorporates steel entrance portals, a reference to the site's industrial heritage. ✓ The retention of the protected stone wall will act as a unique interface between the old and new.
63	Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.	<ul style="list-style-type: none"> ✓ Sustainable urban drainage system (SuDS) measures are incorporated as appropriate into the proposed design.
64	Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport,	<ul style="list-style-type: none"> ✓ Given the site's location, a very low level of car parking for residents is proposed. This will serve to promote a modal shift

Policy Objective	Policy Provision	Statement of Consistency
	walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.	<p>in transport and a reduction in emissions.</p> <ul style="list-style-type: none"> ✓ 1,406 no. cycle parking spaces are provided within the scheme. ✓ The proposed development is designed to NZEB and will achieve a high level of energy efficiency through minimising the use of fossil fuels and associated emissions to air.
75	Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	<ul style="list-style-type: none"> ✓ An EIAR and AA Screening report are included with the application. ✓ The AA Screening concludes that the proposed development will not impact identified Designated Sites either alone or in-combination with other plans or projects.

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

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard, it is considered that the proposed development falls within (1) Central and/or Accessible Urban Locations as it meets the criteria; being within walking distance of the city-centre and significant employment opportunities and adjacent to high capacity public transport options including rail and bus.

This is a Build to Rent proposal and as such the provisions of SPPR 1 regarding mix is not applicable.

SPPR 3 sets out the minimum apartment floor areas as follows;

- Studio (1 person) – 37 sq.m
- 1-Bed (2 persons) – 45 sq.m
- 2-Bed (4 persons) – 73 sq.m
- 3-Bed (5 persons) – 90 sq.m

The minimum floor areas have been met within all individual units and the majority of the units exceed the minimum floor area as is illustrated in the Table below. The requirement for the majority of all apartments to exceed the minimum floor area by a minimum of 10% does not apply to BTR schemes under SPPR 8 (iv).

Unit type	No. units	Unit area required	Average unit area achieved	Largest unit type	Smallest unit type	Average unit type percentage exceedance
3-bed	6	90.00	113.19	114.65	106.90	126%
2-bed	251	73.00	84.97	107.80	78.31	116%
1-bed	256	45.00	51.57	79.09	48.40	115%
Studio	228	37.00	40.38	50.00	38.20	109%

TABLE 2 MINIMUM FLOOR AREAS

SPPR 4 requires that a minimum of 33% of dual aspect units is required in central and accessible urban locations. In this regard 314 of the proposed 741 units are dual aspect i.e. 42%.

SPPR 5 relates to ground level floor to ceiling heights, in this regard the proposed development meets the minimum requirement of 2.7m in all units.

SPPR 6 limits the number of apartments per core to 12no. per floor. However, this is superseded by SPPR 8 (iv) whereby this requirement is not applicable to BTR schemes. Within the scheme, the number of units per core vary, however, in all cases they are below 12 units, see Table below.

Block	Floors	No. of units per floor
B1	5 – 14	10
B2	5 – 14	10
B3	5 – 13	11
C1	3 – 22	8
C2	2 – 4	7
C2	5 – 10	4
C3	3 – 8	10
D1	3 – 8	8
D1	9 – 12	6
D2	1 – 4	7
D2	5 – 7	3

TABLE 3 UNITS PER CORE

Regarding Internal Storage, minimum requirements are established in Appendix 1 and SPPR 8 (ii) states that flexibility can be applied for BTRs. The proposed scheme is fully compliant with the minimum storage areas and as such the flexibility afforded in the Apartment Guidelines is not sought.

In relation to Private Amenity Space it is a requirement to provide apartments with private open space in the form of gardens and patios and balconies. In Build-to-Rent schemes, SPPR 8(ii) states that there is flexibility in the approach to the proportion and provision of private amenity space.

The proposed scheme incorporates a unique and multi layered landscape amenity solution which connects each of the buildings and creates a unique sense of community. Communal and private amenity spaces are located from the first floor upwards and are fully connected by the Highline at first floor level. The highline provides fully connectivity between buildings via a sequence of gardens, courtyards and bridges which enables residents to move between spaces and to be offered a range of external and internal residential amenities. For reference, the Highline design concept is described in detail within Section 03 – SHD Landscape & Open Space of the accompanying Architectural Design Statement.

Based on the Apartment Guidelines, the 741 residential units proposed generates a requirement for 8,006m² of private (balconies) and communal amenity space. Whilst 165m² of private balcony space is provided within Block D1 (west facing balconies overlooking Connolly Square), most of the amenity space is allocated within the shared internal and external amenity spaces at Highline, Block B podium level and at rooftop gardens within each block. The total area of residential amenity being provided is 10,253m² (see Table below) and is in excess of the amenity requirement under the Apartment Guidelines.

Private and Communal Amenity	Area Provided (m ²)
Private amenity area in balconies	165
Private amenity area in internal residential amenity	1,444
Private amenity area in roof gardens	2,423
Communal amenity area in 'Highline' level	3,149
Communal amenity area in podium gardens	3,072
Total Area	10,253

TABLE 4 PRIVATE & COMMUNAL AMENITY

Regarding Security the Guidelines require that occupants and visitors should provide a sense of safety and security by overlooking of the public realm. The proposed 'High Line' communal amenity space overlooks the ground level public realm and Connolly Square providing passive observation and further activation. Each of the residential blocks have independent access from the active ground level streets. The residential units are predominately from Level 2 upward and as such provide passive surveillance. The scheme prioritises pedestrians and vehicular access within the scheme is limited to emergency vehicles.

Refuse Storage provision is a requirement of the Guidelines in apartment schemes and must be accessible to each stair core and designed with regard to the projected waste generation, types and quantities. Within apartments there must be sufficient provision for temporary storage of segregated materials prior to deposition in communal facilities. As outlined above, the scheme provides adequate storage within individual apartments in excess of that required for BTR schemes and communal waste storage is provided at basement level. A separate report accompanies this application prepared by AWN Consulting that outlines the strategy for the operational stage waste management.

Children's Play, the Guidelines require that play needs are incorporated into apartment developments. This scheme proposes play area integrated into the public realm at ground level and within the 'High Line' area. All areas for play are overlooked to ensure that the safety of children is prioritised.

Bicycle Parking & Storage, the Guideline provide a general minimum standard of 1 cycle storage space per bedroom and visitor parking at a standard of 1 space per 2 residential units. 1,406 spaces are provided for both residents and visitors, this is deemed reasonable given the site's context adjacent to public transport and within walking distance of employment locations and the city centre. The scheme will operate under a management company and the adequacy of cycle parking will be kept under continuous review. Cycle parking is proposed at basement and surface level and is easily and safely accessed.

Carparking, in central and/or accessible locations that are well served by public transport, the default policy is for car parking to be minimised, substantially reduced or wholly eliminated in certain circumstances, this is substantiated in SPPR 8 (iii). This application provides 58 no. residential parking

spaces for 741 apartments. The spaces will be provided in the basement. This quantum represents a provision rate of 7.8% or 1 space per 12.8 apartments. The most recent CSO Census data identifies local rates of non-car ownership of 63% and, in the course of pre-planning discussions with both the National Transport Authority (NTA) and Dublin City Council (DCC), the applicants were advised that the site could be considered as an appropriate candidate for zero parking provision.

Chapter 5 of the Guidelines deals specifically with Build-To-Rent schemes and highlights the importance of the provision of dedicated amenities and facilities for residents. SPPR 7 (a) requires that such schemes are adequately described as such in the public notices and in this regard the statutory notices (newspaper and site notices) include reference to the scheme's status as a Build-To-Rent.

SPPR 7 (b) requires applications to be accompanied by detailed proposals for supporting communal and recreational amenities, the facilities are categorised as (i) Resident Support Facilities and (ii) Resident Services & Amenities. Section 4 of the Architectural Design Statement should be referenced for full details. A range of residential amenities and support facilities are included in this application including lounges, a gym, exercise rooms, meeting/workspaces, cinema rooms, bar and lounge and club rooms. The residential blocks are served by a central concierge located in Block C1 and there is a dedicated area for a maintenance office as well as postal services area. Centralised waste management is at basement level. Laundry services are not included as there is sufficient area within individual apartments to accommodate this.

Part V, the guideline highlight that Part V requirements are applicable to BTR scheme and accordingly 75 no. units are proposed, see Part V proposal included under separate cover.

3.3 Urban Development and Building Heights: Guidelines for Planning Authorities (2018)

These Guidelines reinforce that “a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and 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”.

Consolidation and densification are required within the canal ring in Dublin and the Guidelines promote a minimum of 6-storeys with scope for greater building heights by the application of the objectives and criteria set out in Section 2 and 3 of the Guidelines.

SPPR 1 states;

“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.”

The Dublin City Development Plan 2016-2022 identifies the subject site as capable of supporting height of 50m+ and as such the proposed development is acceptable in principle.

Chapter 3 of the Guidelines is concerned with Building Height and the Development Management Process, it sets out a series of questions as follows;

1	Does the proposal positively assist in securing National Planning Framework objectives of focussing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres.	<ul style="list-style-type: none"> ✓ The site is currently under-utilised and activating it for the delivery of a high-density residential scheme and achieving effective consolidation is consistent with the National Strategic Objectives of the NPF to achieve a targeted pattern of growth, specifically; NPO 3a - <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;</i> and, NPO 3b - <i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i>
2	Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?	<ul style="list-style-type: none"> ✓ The site is identified in the Development Plan as suitable for buildings of 50m+ and the proposed development is for buildings ranging in height from 30.95m to 79.45m.
3	Where the relevant development plan, local area plan or planning scheme pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?	<ul style="list-style-type: none"> ✓ Not applicable, see response above.

The Guidelines establishes development management criteria at 3 no. scales; City/Town, District/Neighbourhood/Street and Site/Building. An Applicant must demonstrate that a proposed development satisfies the criteria for each.

City/Town	<ul style="list-style-type: none"> • Public transport • Integration with and enhancement of area – Landscape & Visual Assessment (LVIA) • Positive contribution to place-making 	<ul style="list-style-type: none"> ✓ The site adjacent to Connolly Station with direct access to rail, LUAS, Dublin Bus and Bus Eireann services. ✓ An LVIA together with a suite of photomontages accompanies this application. Post development, the impact is predicted to range from not significant to very significant positive. ✓ While diverting from the character of the surrounding areas, the development would fill a large gap in the existing townscape,
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		<p>reducing the disconnection between the surrounding areas, and establishing a new urban quarter with a distinct identity. In so doing it would enhance all of the surrounding areas, either by direct improvements (e.g. Sheriff Street Lower, Oriel Street Upper) or indirectly through changes to views (introducing a new and attractive built element to the view compositions, indicating a new place of significance in the townscape).</p>
<p>District/ Neighbourhood/ Street</p>	<ul style="list-style-type: none"> • Responds to overall natural and built environment • Enhances urban design context • Cognisant of flood risk • Improvements to legibility • Positively contribute to mix of uses & dwelling types 	<ul style="list-style-type: none"> ✓ The proposed development will bring a brownfield, underutilised isolated site into productive use and will regenerate this area of the city through the introduction of a vibrant urban quarter with a variety of uses including residential, commercial and open space. ✓ A Site-Specific Flood Risk Assessment is included under separate cover and concludes that in line with the justification test the proposed development is acceptable. ✓ A key element of the layout is connectivity both within and to the wider area. In this regard several new connections are being made; Sheriff Street Lower, Oriel Street Upper, Commons Street and Seville Place. ✓ The proposed development is for a mix of apartments and the Housing Needs Assessment has demonstrated that the proposed typology will augment the existing housing stock.
<p>District/ Neighbourhood/ Street</p>	<ul style="list-style-type: none"> • Maximise access to daylight, ventilation & views and minimise overshadowing & loss of light. 	<ul style="list-style-type: none"> ✓ A Daylight assessment accompanies this application under separate cover and demonstrates that 98% of the tested rooms in the proposed scheme are projected to have an

		<p>Average Daylight Factors (ADF) above the recommended Average Daylight Factors (ADF) from the BRE guidelines. From 2 levels above garden level the scheme achieves a 100% pass rate.</p> <ul style="list-style-type: none"> ✓ In terms of shading on surrounding properties, the impact of the proposed development is almost identical to that from the extant permission. ✓ A Site-Specific Flood Risk Assessment is included under separate cover and concludes that in line with the justification test the proposed development is acceptable.
Specific Assessments	<ul style="list-style-type: none"> • Micro-climatic effects • Birds/Bats • Telecommunications • Safe Air Navigation • Urban Design Statement • EIA • AA 	<ul style="list-style-type: none"> ✓ Wind: Pedestrian Wind Comfort CFD Report prepared by IES. ✓ Biodiversity and Bat Assessment included in EIA – Openfield & Dr. Tina Augney ✓ Material Assets – Built Services included in the EIA assesses telecoms. ✓ The Irish Aviation Authority are a statutory consultee and have been issued with a copy of this application. ✓ Architectural Design Statement – RKD ✓ Architectural Heritage Assessment - Clare Hogan ✓ EIA included with the application ✓ AA Screening - Openfield

SPPR 3 states;

“It is a specific planning policy requirement that where;

A;

- an applicant for planning permission sets out how a development proposal complies with the criteria above; and

- the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and these guidelines;

Then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

This application is accompanied by a suite of supporting information that fulfil the obligations of the Applicant for the development management process. The reports demonstrate that the proposed development is appropriate and will not give rise to significant impacts.

Finally, the Guidelines acknowledge that fire safety requirements are a separate regulatory requirement. Nonetheless, developers are encouraged to engage in this process at an early stage. In this regard, the proposed design has been reviewed by a Fire Consultant and comments received are integrated to the design.

3.4 Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)

Aspect	Key Objective	Policy Provision	Statement of Consistency
Pillar 2: Accelerate Social Housing	Increase the level and speed of delivery of social housing and other State supported housing	Key actions: <ul style="list-style-type: none"> 47,000 social housing units delivered by 2021, supported by investment of €5.35 billion Mixed-Tenure Development on State Lands and other lands 	✓ The proposed development will provide 10% social housing units in line with legislative requirements. The development will therefore contribute 75no. units towards the delivery of social housing units as set within Pillar 2 of the Action Plan.
Pillar 3: Build More Homes	Increase the output of private housing to meet demand at affordable prices	Key actions: <ul style="list-style-type: none"> Doubling of output to deliver over 25,000 units per annum on average over the period of the Plan (2017-2021) 	✓ The proposed development will provide 741 no. residential units and will therefore contribute towards the target.
Pillar 4: Improve the Rental Sector	Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.	Key actions: <ul style="list-style-type: none"> Encourage "build to rent" 	✓ The proposed development is a "build-to-rent" scheme, it is designed to high standards and will support greater choice for tenants in the rental market.

3.5 Design Manual for Urban Roads and Streets (2013)

Design Principles	Provisions	Statement of Consistency
Integrated Street Networks	<ul style="list-style-type: none"> Does the development create connected centres that prioritise pedestrian movement and access to public transport? 	<ul style="list-style-type: none"> ✓ The Connolly Quarter opens the site, with key connections through the site at ground level to adjacent streets. ✓ All streets are pedestrian priority and access by vehicles is for emergency vehicles only. ✓ The site is adjacent to Connolly Station and is thus accessible to a range of public transport options.
Movement and Place	<ul style="list-style-type: none"> Does the development create a legible street hierarchy that is appropriate to its context? Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e. community centre, shops, creche, schools etc.)? 	<ul style="list-style-type: none"> ✓ The ground level provides pedestrian and cyclist connections to Sheriff Street LOWER, Oriel Street Upper, Commons Street and Seville Place.
Permeability and Legibility	<ul style="list-style-type: none"> Has the street layout been well considered to maximise permeability for pedestrians and cyclists? Are the streets legible with maximum connection opportunities? 	<ul style="list-style-type: none"> ✓ The layout provides for safe and permeable pedestrian and cycle routes facilitating connection within the proposed development and to the local street network.
Management	<ul style="list-style-type: none"> Is the layout designed to self-regulate vehicle speeds and traffic congestion? Does the proposed layout minimise noise / air pollution wherever possible? 	<ul style="list-style-type: none"> ✓ The proposed development will be a pedestrian priority area with vehicular access for emergency and service vehicles only. ✓ The residential blocks are compliant with Part E of the Building Regulations and as such sound insulation measures are considered. ✓ The emphasis on promoting a modal shift and use of renewable energy will assist with improving air quality.
Movement, Place and Speed	<ul style="list-style-type: none"> Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed? Does the design promote a reasonable balance of both physical and psychological measures to regulate speed? 	<ul style="list-style-type: none"> ✓ Vehicle access within the scheme is restricted and accordingly speed is not a consideration.
Streetscape	<ul style="list-style-type: none"> Does the scheme create an appropriate sense of enclosure in 	<ul style="list-style-type: none"> ✓ The proposed scheme incorporates a comprehensive landscape plan that

Design Principles	Provisions	Statement of Consistency
	<p>addition to a strong urban / suburban structure?</p> <ul style="list-style-type: none"> ▪ Have street trees and areas of planting been provided where appropriate? ▪ Have active street edges been provided where appropriate? ▪ Is a palette of high-quality surface materials and finishes provided? 	<p>is carefully considered to provide a high-quality response to the site both in terms of the hierarchy of spaces proposed and the biodiversity value of the site.</p> <ul style="list-style-type: none"> ✓ Each block offers a quantum of street level commercial uses. Local community uses are also proposed at street level. ✓ The SHD comprises 8 blocks arranged to create new streets and squares whilst offering connections to the surrounding street network. ✓ Facades of each building deliver an overall visual variety with material differing between blocks. The use of brick as the predominant façade material alongside a feature white metallic panel system ensures a low maintenance and durable solution ✓ Connectivity with the surrounding street network is proposed through the existing protected wall.
Pedestrian and Cyclist Environment	<ul style="list-style-type: none"> ▪ Are footways of appropriate width provided so as to ensure pedestrian safety? ▪ Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations? ▪ Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required? ▪ Have cycle facilities been factored into the design? 	<ul style="list-style-type: none"> ✓ All footpaths will be a minimum of 1.80m wide as per the requirements of DMURS and the DCC taking in charge specification. ✓ All pedestrian crossings have been designed as per DMURS and the DCC taking in charge specification. Appropriate tactile paving has been provided at all crossing points. Crossing points reflect the desire lines for both cyclists and pedestrians ✓ All public realm / shared surfaces have been designed as per DMURS and the DCC taking in charge specification. Appropriate tactile paving has been provided to warn both cyclists and pedestrians of these shared spaces. ✓ Cycle lanes and access have been provided along the ramp to the basement carpark where cycle parking has been provided. These cycle lanes will be two way and be a minimum of 2.5m wide as per the requirements of the National Cycle Manual.
Carriageway Conditions	<ul style="list-style-type: none"> ▪ Are vehicular carriageways sized appropriately for their function / location? ▪ Are surface materials appropriate to their application in order to inform 	<ul style="list-style-type: none"> ✓ Access ramps / carriageways to the multi-storey car parks will be a minimum width of 6.0m for two-way traffic and 4.0m for one-way traffic as per the recommendations of the Design recommendations for multi-

Design Principles	Provisions	Statement of Consistency
	<p>drivers of the expected driving conditions?</p> <ul style="list-style-type: none"> ▪ Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists? ▪ Have adequate parking / loading areas been provided? 	<p>storey and underground car parks as published by the ISE. Ramp gradients and geometry will also meet these requirements.</p> <ul style="list-style-type: none"> ✓ All surfaces materials have been specified as per the requirements of DMURS and the DCC taking in charge specification. Raised pedestrian tables will have a different colour to the road materials and will be paint marked appropriately. All internal ramps will be constructed from concrete. ✓ All junctions, both internal and external, have been designed to the guidelines and principles laid down in DMURS. Where possible the needs pedestrians and cyclists have been prioritised over car use by providing raised tables and appropriate tactile paving. ✓ Parking and loading areas will be provided as agreed with DCC and Irish Rail. The size and location of these areas have been designed as per the recommendations of the Design recommendations for multi-storey and underground car parks as published by the ISE. Appropriate turning areas have also been provided and auto-tracked to suit the design vehicles specified.

3.6 Sustainable Residential Development in Urban Areas (2009)

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
<p>Chapter 3</p> <p>The Role of Design</p>	<p>Have designers carried out a site appraisal prior to preparing a layout?</p> <hr/> <p>Is the standard of design of a sufficiently high standard?</p> <hr/> <p>Does the design of residential streets strike the right balance between the different functions of the street, including a sense of place?</p>	<ul style="list-style-type: none"> ✓ Baseline assessments presented in the EIAR relating to a range of matters including population, landscape, water (hydrology & hydrogeology), soils, biodiversity, cultural and architectural heritage informed the proposed layout. ✓ The Design Team prepared a Masterplan including a site analysis, project vision, and concept designs prior to preparing the planning application layout. ✓ The supporting documentation that accompanies this report demonstrates that the proposed scheme meets relevant performance-based criteria and as such is of a high standard of design. ✓ Key connections are proposed at ground level to Sheriff Street Lower, oriel Street Upper, Commons Street and Seville place. Pedestrian movements are prioritised within the scheme. ✓ A 'High Line' provides pedestrian connectivity between the blocks and overlooks the ground level plaza. ✓ The proposed development will provide new interconnectivity in a unique, vibrant, and modern element to the City Quarter in an area of the city that is currently underused and isolated from surrounding streets.
<p>Chapter 4</p> <p>Planning for Sustainable Neighbourhoods</p>	<p>Are lands in accordance with sequencing priorities of development plan or local area plan?</p> <hr/> <p>Assessment of the capacity of existing schools.</p> <hr/> <p>Input of other necessary agencies into the plan/development proposal?</p> <hr/> <p>Is there an appropriate range of community and support facilities?</p> <hr/> <p>For higher density schemes, is there adequate existing public transport, or will it be provided in tandem with development.</p>	<ul style="list-style-type: none"> ✓ The site is a priority site in terms of the National Planning Framework objective of city densification and re-use of existing brownfield sites. ✓ Chapter 6 of the Docklands Social Infrastructure Audit (SIA) Review 2017 concluded primary and secondary school provision should be reviewed after substantial completion of the North Lotts and Poolbeg SDZ's. The updated recommendation in the SIA Review does not contain any recommendation for additional creche or school facilities in the Docklands area within the vicinity of the site. ✓ The proposed development being on a city centre site will be adjacent to a range

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		<p>of leisure, retail, and entertainment facilities consistent with its city centre location.</p> <p>✓ The proposed scheme is adjacent to high-capacity, high-frequency multi-modal public transport hubs.</p>
	<p>Will the development:</p> <ul style="list-style-type: none"> - Prioritise public transport, cycling and walking, and dissuade the use of cars. - Ensure accessibility for everyone including people with disabilities. - Encourage more efficient use of energy and reduction in greenhouse gases. - Include right quality and quantity of public open space. - Include measures for satisfactory standards of personal safety and traffic safety. - Present an attractive and well-maintained appearance. - Promote social integration, provide for diverse range of household types, age groups and housing tenures. - Protect and where possible enhance the built and natural heritage. - Provide for Sustainable Drainage Systems. 	<p>✓ Walking and cycling will be the dominant means of movement in the area and ease of access for pedestrians and cyclists is at the core of the design strategy.</p> <p>✓ The proposed development contains minimal levels of residential car parking spaces and benefits from immediate access to rail, LUAS and bus services.</p> <p>✓ The scheme is designed incorporating the principles of universal access and to the standards of Part M of the Building Regulations.</p> <p>✓ The proposed development is designed to Universal Design principles ensuring access for all.</p> <p>✓ The scheme is designed to NZEB meaning it will achieve a high level of energy efficiency and consequent reduction in the generation of GHGs. The low volume of carparking will also contribute to a reduction in emissions.</p> <p>✓ The Housing Quality Audit that accompanies this application demonstrates that the scheme exceeds the public open space requirement.</p> <p>✓ The Landscape Design Statement outlines that there is a hierarchy of open spaces provided intended for both active and passive use and catering for different age groups.</p> <p>✓ Increased levels of pedestrian activity along brought about by the inclusion of new connections will improve passive surveillance and result in a safer environment. The 'High Line' pedestrian route will overlook the ground floor public plaza.</p>

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		<ul style="list-style-type: none"> ✓ The Architectural Design Statement presents the detail of the scheme's materiality and confirms that it will be an attractive place to live, work and play. ✓ The mix of units proposed includes studios, 1,2 and 3-bedrooms. ✓ Social and affordable accommodation will form part of the proposed scheme. ✓ The proposed design celebrates the industrial heritage of the site and sensitive interventions are proposed to the protected wall to allow connections with adjacent streets. ✓ The landscape proposals include features to enhance the biodiversity value of the site. ✓ A comprehensive surface water drainage strategy with SuDS features is proposed.
<p>Chapter 5</p> <p>Cities and Larger Towns</p>	<ul style="list-style-type: none"> - Are residential densities sufficiently high in a location which are, or will be, served by public transport. - Are higher densities accompanied by high qualitative standard of design and layout? - Does the design and location of new apartment blocks respect the amenities of existing adjacent housing in terms of sunlight and overlooking? 	<ul style="list-style-type: none"> ✓ The proposed density is 257 units per hectare. This is appropriate given the site's location adjacent to public transport and with immediate access to employment opportunities. ✓ The Housing Quality Audit demonstrates that the scheme meets the qualitative requirements of a build to rent scheme. The majority of the units exceed the minimum floor area requirements. 42% of the units are dual aspect, this exceeds the required 33%. The scheme as designed exceeds the BRE guidelines for sunlight and daylight. ✓ The sunlight/daylight assessment concludes that the predicted level of impact on adjacent residential development is similar to the impact of the extant planning permission.
<p>Chapter 7</p> <p>The Home and Its Setting</p>	<ul style="list-style-type: none"> - In higher density developments, does quality of design and finish extend to individual dwellings and its immediate surroundings. - Decent levels of amenity, privacy, security and energy efficiency. 	<ul style="list-style-type: none"> ✓ The proposed residential development will be a high-quality energy efficient design. Finishes reflect the city centre location and the character of Project Connolly as a new vibrant City Quarter.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<ul style="list-style-type: none"> - Will orientation of dwelling and internal layout maximise levels of daylight and sunlight? - Has privacy been considered in design of the home. - Has the design sought to create child and pedestrian friendly car-free areas? - Has the design been influenced by the principles of universal design? - Has adequate provision been made for the storage and collection of waste materials? 	<ul style="list-style-type: none"> ✓ The buildings are NZEB compliant, provide for passive surveillance, includes a comprehensive landscaping scheme that meets established standards and provides occupants with a wide range of support services. ✓ There are no north facing units and 42% are dual aspect. The daylight/sunlight assessment confirms that the scheme meets the BRE guidelines. ✓ The units are designed to avoid overlooking and all units will comply with the requirements of Part E in terms of noise insulation. ✓ A very low level of car parking (58 no. spaces) is proposed. The design is focussed on prioritising pedestrians and creating safe areas for children's play. ✓ The design complies with the requirements of Part M of the Building Regulations and principles of universal design. ✓ Dedicated residential waste storage areas are included in the basement. Waste will be taken to the service yard at the rear of block C for temporary storage prior to collection by the waste contractor. The facilities management company in conjunction with the waste contractor will be responsible for conveying the bins from the to the collection point for emptying

3.7 Urban Design Manual – A Best Practice Guide (2009)

This section should be read in conjunction with the **Architectural Design Statement** and **Landscape Design Statement** that accompanies this application under separate cover.

Criteria No.	Aspect	Provisions	Statement of Consistency
1	Context - How does the development respond to its surroundings?	<ul style="list-style-type: none"> ▪ The development seems to have evolved naturally as part of its surroundings. ▪ Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users. ▪ Form, architecture, and landscaping have been informed by the development's place and time. ▪ The development positively contributes to the character and identity of the neighbourhood. ▪ Appropriate responses are made to the nature of specific boundary conditions. 	<ul style="list-style-type: none"> ✓ The proposed design is guided by a detailed analysis of the existing environment, planning policy regarding height and consolidation of the existing urban footprint at both national and local level, the site's extant planning permission. ✓ The design incorporates new connections and defines new urban edges around a hierarchy of new streets and squares. ✓ The building height strategy involves a stepping down in height towards the eastern boundary and the smaller scale and grain of the residential units on Oriel Place and adjoining streets. ✓ Proposed blocks are arranged in height and form to optimize daylight penetration into the new communal and private open spaces and with the block heights proposed in response to existing site boundary conditions. ✓ The proposed development will contribute to the creation of a new urban quarter connected to its surroundings and the wider Docklands area.
2	Connections - How well connected is the new neighbourhood?	<ul style="list-style-type: none"> ▪ There are attractive routes in and out for pedestrians and cyclists. ▪ The development is located in or close to a mixed-use centre. ▪ The development's layout makes it easy for a bus to serve the scheme. 	<ul style="list-style-type: none"> ✓ New pedestrianised street connections to the site at ground level are proposed. ✓ This is an inner-city site and as such benefits from all of the services and amenities offered by the city. ✓ Linkages to the wider area are provided via a network of new

Criteria No.	Aspect	Provisions	Statement of Consistency
		<ul style="list-style-type: none"> ▪ The layout links to existing movement routes and the places people will want to get to. ▪ Appropriate density, dependent on location, helps support efficient public transport. 	<p>connections to the wider area including the Docklands and city-centre.</p> <ul style="list-style-type: none"> ✓ The scheme is adjacent to rail, bus and LUAS services. ✓ The proposed development will add to the densification of Dublin city centre and maximise utilisation of public transport.
3	<p>Inclusivity</p> <ul style="list-style-type: none"> - How easily can people use and access the development? 	<ul style="list-style-type: none"> ▪ New homes meet the aspirations of a range of people and households. ▪ Design and layout enable easy access by all. 	<ul style="list-style-type: none"> ✓ The scheme incorporates a diverse range of apartment types, studios (30.8%), 1 (34.7%) 2 (33.7%) and 3-bedroom (0.8%) apartment types that differ in size and layout offering a variety of solutions to people of all ages and family size. This balance of apartment types reflects the demands of the local context and complements existing traditional housing stock. ✓ The scheme is Part M compliant allowing for access by all regardless of ability.
4	<p>Variety</p> <ul style="list-style-type: none"> - How does the development promote a good mix of activities? 	<ul style="list-style-type: none"> ▪ Activities generated by the development contribute to the quality of life in its locality. ▪ Uses that attract the most people are in the most accessible places. ▪ Neighbouring uses and activities are compatible with each other. ▪ Housing types and tenure add to the choice available in the area. ▪ Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood. 	<ul style="list-style-type: none"> ✓ There is an under-supply of accommodation in the city center. There is a particular shortage of rental accommodation suitable for employees of the Docklands area. Analysis of Census 2016 demonstrates that the population of the Docklands are in the majority age 20-40, single or couples without children. ✓ More than 27,000 commuters travel to the Docklands each day. Providing accommodation to rent for employees is critical to the continued economic success of the Docklands and the city center. The proposed development aims to meet the accommodation needs of the workers in the Docklands and city center.

Criteria No.	Aspect	Provisions	Statement of Consistency
			<ul style="list-style-type: none"> ✓ Residential support amenities including a gym, a resident's lounge, work areas, meeting rooms, dining rooms, recreational areas are pepper-potted through the scheme. ✓ 10 no. units are proposed for retail, commercial, and community uses.
5	<p>Efficiency</p> <ul style="list-style-type: none"> - How does the development make appropriate use of resources, including land? 	<ul style="list-style-type: none"> ▪ The proposal looks at the potential of higher density, considering appropriate accessibility by public transport and the objectives of good design. ▪ Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems. ▪ Buildings, gardens and public spaces are laid out to exploit the best solar orientation. ▪ The scheme brings an underutilised and semi-derelict site into more productive use. ▪ Appropriate recycling facilities are provided. 	<ul style="list-style-type: none"> ✓ The proposed development is designed to maximise a scarce resource, that is, inner city land. It takes advantage of investment in the public transport network. ✓ A variety of communal and private amenity space is provided for and the design integrates features to enhance the biodiversity potential of the site. ✓ SuDS measures are incorporated into the design. ✓ The sunlight assessment to amenity spaces demonstrates that across the site 68% of the amenity areas receive more than 2 hours of sunlight on March 21st, this exceeds the BRE requirement of 50%. ✓ The design of each building has been carefully considered to maximise daylight penetration. The width and height of windows has been optimized and balconies are omitted where they were deemed to result in overshadowing. 98% of the rooms tested for are projected to have an average daylight factor above the BRE guidelines. ✓ Waste storage facilities are provided at basement level for source segregation of waste.

Criteria No.	Aspect	Provisions	Statement of Consistency
6	<p>Distinctiveness</p> <p>- How does the proposal create a sense of place?</p>	<ul style="list-style-type: none"> ▪ The place has recognisable features so that people can describe where they live and form an emotional attachment to the place. ▪ The scheme is a positive addition to the identity of the locality. ▪ The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout. ▪ The proposal successfully exploits views into and out of the site. ▪ There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre. 	<ul style="list-style-type: none"> ✓ At the core of the scheme is the retention of the historic legibility and authentic character of the site in a manner that will enhance new spaces, re-engage with the local streetscapes and contribute a positive sense of place. ✓ A careful approach to the 19th century boundary wall is provided; interventions are balanced with retention of the historic fabric in so far as is practicable. ✓ The choice of materiality reflects the site's context and its industrial past incorporating metal cladding, brickwork and industrial detailing. ✓ Entrances from the surrounding street network will allow the greatest number of people experience the development.
7	<p>Layout</p> <p>- How does the proposal create people-friendly streets and spaces?</p>	<ul style="list-style-type: none"> ▪ Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around. ▪ The layout focuses activity on the streets by creating active frontages with front doors directly serving the street. ▪ The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers. 	<ul style="list-style-type: none"> ✓ The proposed development will be a pedestrian priority area. ✓ The proposed connections with surrounding streets will provide for activation. ✓ The ground floor public realm offers a series of streets and squares which are pedestrian priority. Vehicles are segregated from the public realm with emergency access only. ✓ A reception/concierge and arrival space is located at the base of Block C1 and each of the residential blocks are provided with independent entrances from the active ground floor street.
8	Public Realm	<ul style="list-style-type: none"> ▪ All public open space is overlooked by surrounding 	<ul style="list-style-type: none"> ✓ The landscape proposal announces itself to the city

Criteria No.	Aspect	Provisions	Statement of Consistency
	<ul style="list-style-type: none"> - How safe, secure and enjoyable are the public areas? 	<p>homes so that this amenity is owned by the residents and safe to use.</p> <ul style="list-style-type: none"> ▪ The public realm is considered as a usable integrated element in the design of the development ▪ Children’s play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood. ▪ There is a clear definition between public, semi private, and private space. ▪ Roads and parking areas are considered as an integral landscaped element in the design of the public realm. 	<p>along Sherriff Street, offering entrances to a distinctive public space.</p> <ul style="list-style-type: none"> ✓ The treatment of the public space is linked with the adjacent ground floor uses and residential entrances, together with its arrangement as a through route connecting to the adjoining streets in a manner that will also generate footfall, this sets the place up to be busy and lively. ✓ The ‘High Line’ essentially a network of connected spaces set along a route that threads though and around the site. ✓ Residential courtyards are overlooked, and a privacy buffer zone is proposed along the building facades. ✓ Accessible roof terraces are sheltered from the elements with balustrades and planting that will act as windbreaks. ✓ Play elements are placed within the public realm components at ground level and on the ‘High Line’ and an excellent level of passive surveillance is provided. ✓ Essentially a network of connected spaces set along a route that threads though and around the site, in places overlooking the public realm.
9	<p>Adaptability</p> <ul style="list-style-type: none"> - How will the buildings cope with change? 	<ul style="list-style-type: none"> ▪ Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation. ▪ The homes are energy-efficient and equipped for challenges anticipated from a changing climate. ▪ Homes can be extended without ruining the character of the 	<ul style="list-style-type: none"> ✓ A Build to Rent scheme is proposed and to ensure its retention as such a restriction is applied requiring the homes to remain as rented for a minimum period of 15-years. ✓ The buildings are designed to NZEB standards and in designing the surface water strategy rainfall levels have been increased by 20% to account for climate change factors.

Criteria No.	Aspect	Provisions	Statement of Consistency
		types, layout and outdoor space.	
10	Privacy and Amenity - How does the scheme provide a decent standard of amenity?	<ul style="list-style-type: none"> ▪ Each home has access to an area of useable private outdoor space. ▪ The design maximises the number of homes enjoying dual aspect. ▪ Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout. ▪ Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units. ▪ The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables. 	<ul style="list-style-type: none"> ✓ Private open space is predominately in the form of podium and roof gardens with some balconies. The Housing Quality Audit confirms that the area allocated is compliant with the standards established in the Design Standards for New Apartments. ✓ 42% of the proposed units benefit from dual aspect this is in excess of the required 33% in central/accessible locations. ✓ The design meets Part E of the Building Regulations and aims to ensure that dwellings achieve reasonable levels of sound insulation. ✓ Waste facilities for future occupants are provided at basement level.
11	Parking - How will parking be secure and attractive?	<ul style="list-style-type: none"> ▪ Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces. ▪ Adequate secure facilities are provided for bicycle storage. 	<ul style="list-style-type: none"> ✓ Car parking will be at basement level. ✓ 1406 no. covered cycle parking spaces are proposed.
12	Detailed Design - How well thought through is the building and landscape design?	<ul style="list-style-type: none"> ▪ The materials and external design make a positive contribution to the locality. ▪ The landscape design facilitates the use of the public spaces from the outset. ▪ Design of the buildings and public space will facilitate easy and regular maintenance. ▪ Care has been taken over the siting of flues, vents and bin stores. 	<ul style="list-style-type: none"> ✓ The industrial heritage of the site is recognised in the external finishes to the blocks comprising predominately brick with a metallic panel system. ✓ The landscape design includes new connections with the surrounding street network. Connolly Square, a new urban square is located at the heart of the scheme. ✓ Bin stores in basement.

3.8 Childcare Facilities Guidelines for Planning Authorities (2001)

This section should be read in conjunction with the **Childcare Assessment** that accompanies this application under separate cover.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
<p>Chapter 3</p>	<p>In new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site.</p>	<ul style="list-style-type: none"> ✓ A Childcare Assessment accompanies this application. It establishes the existing childcare provision within 1km of the proposed development site, to ascertain the need and demand, if any, for a creche facility in conjunction with the provision of 257no. units capable of accommodating families on the subject site i.e. 2 bed + units. 4.7% of the population within the Connolly Site catchment is aged 0-4 which is lower than the State average of 7%, while only 4.1% of the population of North Dock C ED was aged 0-4 year, where the site is located. The proposed development is 'build to rent' and it is anticipated that the primary market for the proposed development are young professionals looking to be close to employment who are also in the pre-family stage of the life cycle. ✓ 15no. childcare facilities were identified with a good geographical spread in relation to the proposed development site. There are a further 26no. facilities within an approximately 20-minute walk time. Within the 15-minute catchment the childcare facilities there have capacity for 675 children. 2 further childcare facilities are permitted within the catchment. ✓ There are 2,515no. children aged between 0-4 within the 11no. EDs examined for this assessment, all within 1km of the subject site. Based on the data presented in the Quarterly National Household Survey, Quarter 3 2016, 25% of children in Dublin are accommodated in a creche/Montessori, thus there is a requirement for 629no. places in this catchment. ✓ The subject site may generate an additional 38no. childcare spaces and all these spaces will be supplied by the childcare facilities within 1km or approximate 15-minute walk time.

		Based on the childcare audit and assessment there is no requirement for the inclusion in the proposed scheme.
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3.9 Architectural Heritage Guidelines (2011)

The Architectural Heritage Protection Guidelines is a long and detailed document, covering a wide range of issues including Architectural Heritage Protection policy and how it might be applied by Local Authorities in making statutory designations for the protection of heritage, physical techniques, and chapters dedicated to the discussion of individual building elements and their conservation. Many of the provisions in the Guidelines would not apply to what is proposed in the subject application. Where principles could be said to apply to the subject development, the way in which those principles have been stated in the Guidelines is vague or the Guidelines stop short of recommending a course of action and instead suggest that certain works should be approached with caution. This is necessary due to the case-by-case basis by which the impact of development on architectural heritage must be assessed – given the wide variety of structures of heritage importance, it is not possible to suggest a set of universal rules that can be rigidly applied in all cases and any attempt to do so has the potential of causing more harm than good. Indeed, this principle is expressly stated at Section 7.6.2 of the Guidelines, which states “The blanket application of standard solutions to historic buildings is not appropriate”. As such, it is suggested that it is not possible to definitively say whether any development is consistent with the Architectural Heritage Protection Guidelines for Planning Authorities as (i) the Guidelines leave room for interpretation so that approaches recommended therein can be adapted, as appropriate, to the individual needs of a building/structure; and (ii) there is much debate on what could be considered conservation best practice on some issues.

An **Architectural Heritage Assessment** prepared by Clare Hogan is included with this application under separate cover. The report concludes that the site is located in an area that has suffered poverty and neglect, the development proposals at Connolly Station envisage a vibrant new residential quarter that introduces connections to the existing urban fabric of the city. Design principles that inform the development proposals include permeability, the integration of a historic industrial site into the fabric of the inner city as a destination that welcomes visitors and passers-by alike. The design integrates contemporary architecture within the site in ways that are sensitive to the character of the historic industrial buildings, balancing a need for conserving as much of the historic fabric as possible with the sustainable development of the site.

Walls and buildings can be barriers whereas arches invite entry and promote public access. A recurring theme of widely accepted urban regeneration plans and policies is that of linkages and connections. By opening up historic and new routes greater permeability of the city block is achieved, and the pedestrian is encouraged and attracted to move within or linger by introducing attractive public realm and amenities.

The scheme enables new connections to the surrounding area and key movement routes, opening up views to and from the site. The proposed entrances through arches on Sheriff Street Lower and at Seville Place retains their historical special interest and add interest and value to the proposed new quarter, emphasizing its uniqueness. The development proposals promote public access, permeability and connectivity. These are the principles underpinning the urban planning of the new quarter. The design concept embodies an ambition to protect and conserve, to integrate the boundary walls in a meaningful fashion in order to ensure their long-term survival. It includes building specific strategy for conservation of historic building materials, intervention, repair and extension.

While change is inevitable, and the conservation process is receptive to development that is recognised as being of positive value to the appearance of an area. A balance of conservation and development is sought, in other words sustainable development. 'For each local situation a balance is reached between preservation and protection of urban heritage, economic development, functionality and liveability of a city. Thus, the needs of current inhabitants are responded to while sustainably enhancing the city's natural and cultural resources for future generations. 'UNESCO – new life for historic cities. Notwithstanding change, at the core of the design vision is a commitment to communicate heritage values, to conserve and make accessible this heritage for inhabitants and visitors to the city and to integrate the significant built elements of railway heritage with the contemporary interventions.

4 Regional Planning Policy

4.1 Eastern & Midland Regional Spatial & Economic Strategy 2019-2031

The Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (RESS) 2019-2031 anticipates that Dublin City and Suburbs will experience population growth of 220,000 over the period 2019-2031. The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs.

Reference	Relevant Policy / Objective	Statement of Consistency
RPO 3.4	Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	✓ The application is accompanied by an EIAR and an AA Screening Report.
RPO 4.3	Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.	✓ The proposed development is an infill / brownfield that will provide high density residential apartments within an inner-city centre site adjacent to a confluence of public transport and confirmed as acceptable by Irish Water.
RPO 5.3	Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.	<ul style="list-style-type: none"> ✓ The proposed development is located adjacent to key Dublin transportation hubs including train, bus, Luas, and Dublin cycle network. ✓ The site is proximate to employment centres in the Docklands and City Centre. ✓ The proposed development minimises car parking to promote a modal shift. ✓ The scheme prioritises pedestrians and cyclists and provides connections to adjacent streets.

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', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines' and 'Urban Development and Building Heights Guidelines for Planning Authorities'.	✓ The proposed density is 257 units per hectare and is compliant with the qualitative standards for the development of sustainable residential development as established in the Housing Quality Audit and Design Statement that accompanies this application.
RPO 5.5	Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.	✓ A Housing Needs Assessment accompanies this application and demonstrates the need for the proposed housing mix. The proposed development of this inner-city brownfield site would realise the objective of consolidation of Dublin and compact growth.
RPO 8.7	To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.	✓ A Mobility Management Plan is included with this application under separate cover. It concludes that overall, the location of the proposed development, along with the measures considered, will aim to ensure that travel by public transport, by bike or by foot is a preferred alternative to travel by private car for a significant portion of travellers.
RPO 9.13	Local authorities and relevant agencies shall ensure that new social infrastructure developments are accessible and inclusive for a range of users by adopting a universal design approach and provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives.	✓ The proposed development is designed in accordance with the Building Regulations Part M, Universal Design principles.
RPO 9.3	Support the sensitive reuse of protected structures.	✓ Refer to section 3.9 of this SoC.

5 Conclusion

This Statement demonstrates that the proposed development is in compliance with relevant national and regional planning policy together with section 28 ministerial guidelines. Compliance with the Dublin City Development Plan is established in the Planning Statement that accompanies this application under separate cover.

The design of the proposed development has been informed by an understanding of the site context and the requirement to comply with planning and environmental legislation and policy.

Located at the confluence of rail, DART, LUAS and bus services and at the interface of two employment hubs, comprising Dublin City Centre and the Docklands, the subject site offers a unique opportunity for the city of Dublin and will transform this under-utilised brownfield site into a vibrant new urban quarter.

Given the highly central and accessible nature of the site location, the most sustainable strategy for its redevelopment is to maximise density and height, minimise car parking and ensure ease of movement for public transport passengers, pedestrians and cyclists. Connolly Quarter is thus a high-rise and high-density development incorporating a mix of uses with well-considered open spaces that will add vitality to the local area and provide substantial improvements to the site's permeability and create an attractive public realm.

The overarching objective is to create a new urban neighbourhood that can address the wider regeneration challenges presented at this site. The current proposal achieves this by providing opportunities to enhance permeability and connectivity and through a mix of residential, retail and community uses that will bring life to the site and surrounding street network. The proposed development will be fully integrated with Sheriff Street Lower, Oriel Street and Seville Place, encouraging pedestrian activity through the site, benefitting surrounding residents, future occupants and commuters.

The Connolly Quarter responds to the housing demands of the local community and workforce by incorporating a mix of unit sizes that will address the shortfall in housing supply and meet the identified needs of Dublin City and the Docklands. The proposed scheme also incorporates an extensive range of supporting retail and community functions, to maximise amenity for residents, employees and visitors. This residential led development has been designed to meet and where possible exceed the requirements of the Design Standards for New Apartments Guidelines (2018).

The architectural drawings, considered in conjunction with the Architects Design Statement, Masterplan and Housing Quality Assessment demonstrate the applicant's commitment to delivering a well-designed scheme that will create a vibrant and attractive city neighbourhood for people to live, work and socialise.

The design approach to Connolly Quarter achieves optimum use of a site which has its own inherent constraints. The proposal will contribute to the creation of a dynamic, high-density mixed-use development in this strategic urban regeneration site.

The design and layout of the proposed development will ensure the highest standards of urban design and sustainability are achieved, in a manner that responds to the surrounding residential, transport and commercial uses in this unique urban location.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality Strategic Housing Development proposal which is now being submitted for the consideration of An Bord Pleanála