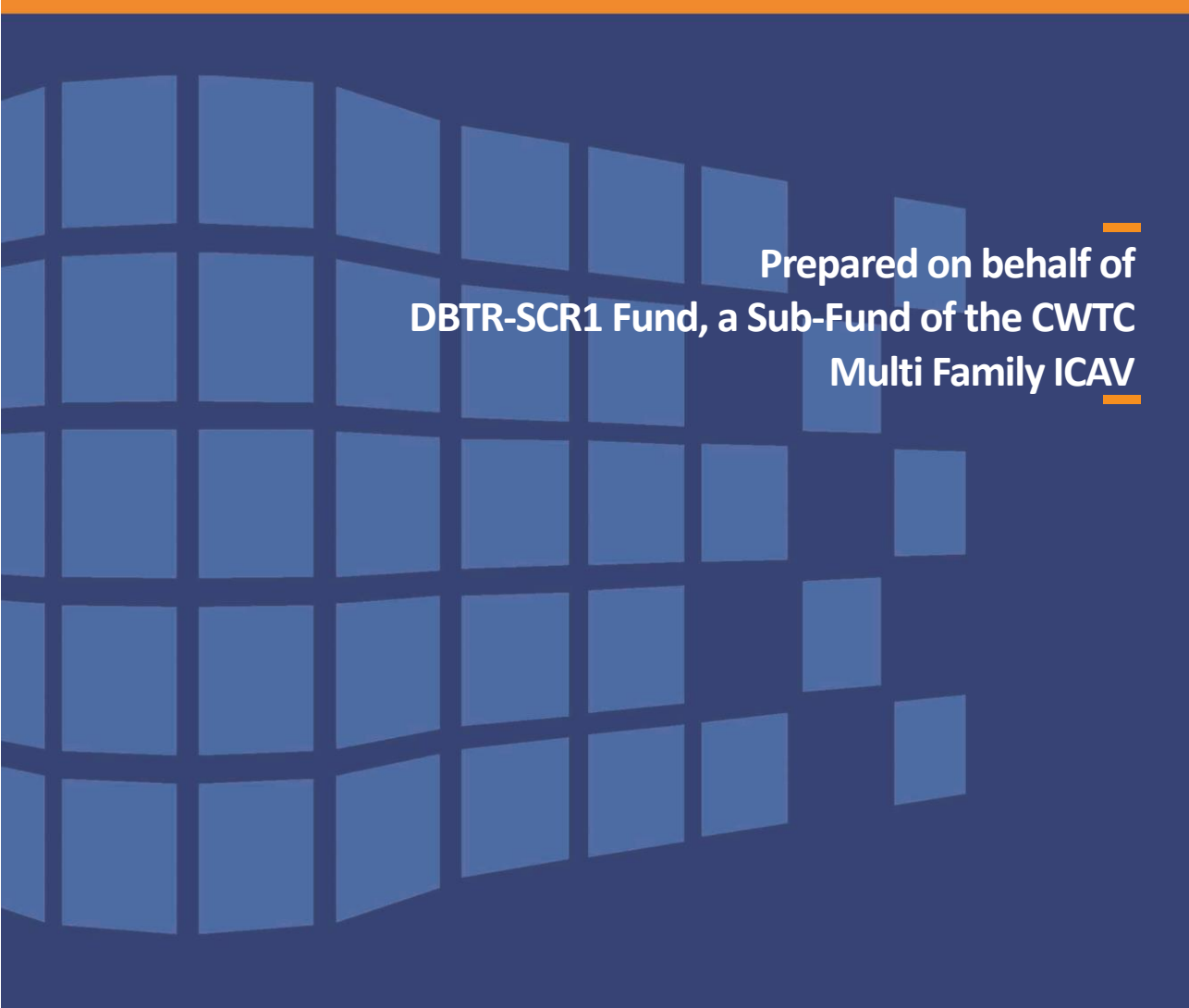


# Planning Statement & Statement of Consistency with Dublin City Development Plan 2016-2022

Proposed Strategic Housing Development on the former Player Wills Site and lands owned by Dublin City Council at South Circular Road, Dublin 8

December 2020



Prepared on behalf of  
DBTR-SCR1 Fund, a Sub-Fund of the CWTC  
Multi Family ICAV

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## Document Control Sheet

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## Executive Summary

A key element in successful placemaking is to provide a range and diversity of uses, activities and built form. The design strategy for the proposed development site is to contribute to Dublin City Council's long held objective to regenerate St. Teresa's Gardens and Environs. To achieve this, it is proposed to activate this strategically located, vacant brownfield site, with a residential led mixed-use development. The proposed development will provide a substantial quantity of new homes in Dublin 8, together with community infrastructure and amenities that will serve future occupants and the wider neighbourhood.

The proposed development site encompasses an area of 3.06 hectares including the former Player Wills site and undeveloped amenity lands owned by Dublin City Council (DCC) to the immediate west.

It is proposed to deliver 732 no. new homes across 4 no. blocks (PW1, PW2, PW4 and PW5) on the former Player Wills site. The homes will vary in size and layout and will accommodate single occupants through to dwellings for 6 people. This approach will allow residents an opportunity to continue to live within the area and upsize/downsize as their needs change.

While not a Protected Structure, the former Player Wills factory is listed in the National Inventory of Architectural Heritage (NIAH) and is assigned a rating of Regional significance. A key objective of the proposed design is to retain the historic original fabric of the building and successfully fuse the old and new. The design sensitively repurposes the building to provide new homes with an enhanced public space at ground floor level, that will act as an arts, culture, retail and entertainment destination. This multi dimensional design approach will contribute to creative placemaking and breath new life into the building and the community, whilst ensuring the most important heritage features are conserved and celebrated.



FIGURE 1 PLAYER WILLS BUILDING – COMPUTER GENERATED IMAGE

Shared accommodation is proposed within the remodelled factory building (Building PW1). This is a form of community living that combines private living space with shared communal services. The scheme proposes 240 no. single occupancy, generously sized private living areas, ranging from 19 sq.m to 32 sq.m, thus significantly exceeding the minimum room size of 12 sq.m required by the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018). Extensive supporting communal areas for daily living are proposed including kitchens, lounges, terraces, games rooms, a library, a cinema room, a gym, a business centre, co-working space and laundry facilities.

Build to rent apartments are concentrated across buildings PW 2, 4 and 5 with a small number in the former factory building, PW1. In total, 492 no. apartments are proposed and incorporate a mix of dwelling sizes from studios through to 3-bedroom apartments. Dedicated amenities, services and facilities are provided and will contribute to the creation of a shared environment where residents can become more integrated and develop a sense of belonging with their neighbours.

There is an increasing demand for conveniently located coworking space. Recognising this need, for live/work environments, commercial floor space to accommodate co-working is proposed at ground floor within building PW1 and dedicated tenant co-working floor space is proposed in building PW2, combined there is capacity for approx. 50 workstations.

Cognisant of the impact of the Covid-19 pandemic, the proposed design has been reviewed by SOS International, experts in public health. Their report is included in Appendix 4.1 of the Environmental Impact Assessment Report (EIAR). The risk assessment undertaken concludes that the risk of transmission between individuals within the proposed development is low. It determines that the planned layout has the necessary control measures in place such as environmental controls pertinent to adequate ventilation, social distancing, spacing requirements, sewage and drainage etc. that allow for the risk to be qualified as low.

The approach to height is cognisant of the existing environment and a transitioning effect is applied with buildings tapering down to the site's perimeters. Tall projections are located toward the centre of this proposed new urban quarter with frontage to the new street network and overlooking the proposed public parks, 'Players Park' and 'St. Catherine's Park'.



**FIGURE 2 PW2 - COMPUTER GENERATED IMAGE**



The extensive use of brick, including traditional red brick (as found along South Circular Road) and buff brick (as found in Dolphins Barn and the former factory building) compliments the development's surroundings but are used with a more contemporary expression of texture and arrangement. In some instances, metal detailing echoes the industrial nature of the existing site, while throughout the development, window openings and balconies provide contrasts in colour and texture.



**FIGURE 3 SAMPLE OF PROPOSED MATERIALS**

To the northwest of the former factory building, a public park (approx.0.4 hectares), 'Players Park' is proposed on DCC lands. The inclusion of this park delivers on a key objective for this Strategic Development Regeneration Area (SDRA 12) established in the Dublin City Development Plan (DCDP) 2016-2022, "*to deliver a new landmark public park incorporating a comprehensive landscaping strategy with passive supervision by residential and other uses, that will provide for a diverse range of recreational facilities for use by the wider neighbourhood*". The proposed internal street network will provide connectivity to the park from all sites within the regeneration lands.

'Players Park' is a similar size to the nearby 'Weaver Park' and over twice the size of 'Oscar Square' also in Dublin 8. The landscape design approach is to create a multifunctional space with play areas, informal lawns, market areas and event space, set within a biodiverse rich landscape, where people can gather for recreation and play.



**FIGURE 4 PROPOSED 'PLAYERS PARK' - COMPUTER GENERATED IMAGE**

A second park, 'St. Catherine's Park' is proposed adjacent to Building PW4, the proposed creche and the existing St. Catherine's National School. It is designed as a predominately formal play area that will cater for all age groups with good passive surveillance provided by the surrounding buildings and street network to ensure a safe environment.



**FIGURE 5 PROPOSED ST. CATHERINE'S PARK - COMPUTER GENERATED IMAGE**

These parks will substantially contribute to the network of new urban parks envisaged in DCCs *Liberties Greening Strategy* that seeks to reverse the persistently low indices around access to public space and nature, tree cover and environmental services in the Dublin 8 area.

The site encompasses a network of connected spaces and routes that prioritises pedestrians and cyclists. Moreover, it links into the wider regeneration lands and surrounding street network with the result that the site facilities openness, ease of access and interconnectivity.

To achieve the highest quality in public realm, parking is predominantly at basement level. Given the accessible location of the site, the ratio of carparking is 0.3 spaces per apartment unit and this will contribute to encouraging residents to move toward using sustainable transport modes (walking, cycling, bus and Luas) with consequent environmental and health gains.

The anticipated population generated by the proposed development is approx. 1,304 and it is estimated that the proposed non-residential uses (culture and arts floor space, retail, food and beverage, childcare etc.) will generate approx. 191 on site employment opportunities. Therefore, the proposed development would generate employment opportunities for 15% of the predicted future population. Additionally, employment will be generated to manage the proposed development.

The proposed development provides the necessary infrastructure for a sustainable community;

- good quality homes for a diverse range of household types incorporating high standards of sustainability;
- a range and diversity of non-residential uses that complement existing services locally and address identified deficits including arts and culture and childcare;
- protects and enhances the natural and built environment;
- promotes health lifestyle through active travel and access to open space for leisure and recreation; and,
- designs streets as public spaces rather than thoroughfares.

This proposal complements and integrates with the permitted development on the wider regeneration lands including St. Teresa's Gardens and the former Bailey Gibson site and is cognisant of future development proposals for the wider Masterplan area. Together, a new integrated and inclusive urban quarter will be delivered that will enhance the vitality and vibrancy of Dublin 8, through the delivery of opportunities to live, work and play.

The proposed development contributes significantly toward achieving the overall objectives for the SDRA 12 by providing;

- ✓ A vibrant mixed-use urban quarter;
- ✓ A new landmark public park incorporating a comprehensive landscaping strategy with passive supervision by residential and other uses, that will provide for a diverse range of recreational facilities for use by the wider neighbourhood;
- ✓ Strong permeability to generate movement and activity east-to-west (connecting Dolphin's Barn Street and Cork Street with Donore Avenue) and north-to-south (connecting Cork Street and Donore Avenue with the South Circular Road and Grand Canal corridor);
- ✓ A high-quality public domain, provision of pedestrian and cyclist routes and provision of active streets;
- ✓ A community hub to provide a wide range of community facilities accessible to the wider neighbourhood;
- ✓ An opportunity to highlight the heritage of the local area by proposing community uses within the retained former Player Wills factory building; and
- ✓ Reserving an area of the site for the expansion of St. Catherine's National School.

# 1. Introduction

## 1.1 Introduction

This Planning Statement has been prepared by McCutcheon Halley (MH) Chartered Planning Consultants on behalf of the Applicant, DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV. The Applicant is seeking permission for a mixed use, Build to Rent (Batra) Strategic Housing Development (SHD) at the former 'Player Wills' site (2.39 hectares) and adjoining lands (0.67 hectares) under the control of Dublin City Council (DCC), see **Figure 6**. A Letter of Consent from DCC accompanies this application.



**FIGURE 6 PROPOSED DEVELOPMENT SITE**

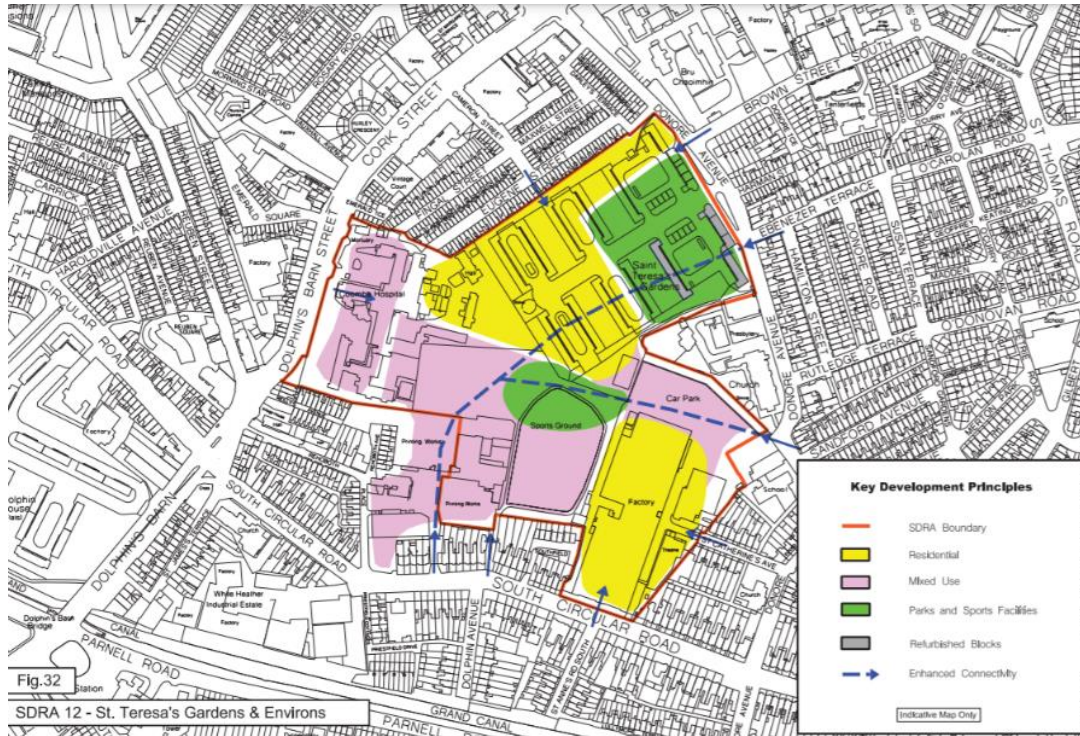
This application for permission meets the definition of strategic housing development in section 3 of the Planning and Development Act 2000, as amended. The proposed development is for 100 or more houses on land zoned for residential use or for a mixture of residential and other uses. The cumulative gross floor area of the houses, comprises not less than 85 per cent of the gross floor space of the proposed development and the 'other uses' do not cumulatively exceed 15 square metres gross floor space for each house, subject to a maximum of 4,500 square metres gross floor space.

This proposed Build to Rent development includes both apartments and shared accommodation. The development will remain owned and managed by an institutional entity for at least 15 years and individual units will not be sold or rented separately for that period.

The Applicant has carried out consultation with the Planning Authority under Section 247 of the Planning and Development Act 2000, amended, see Section 4 of this report for full details. A pre-application consultation meeting was held with An Bord Pleanála (ABP) under Section 6(5) of the Planning and Development Act 2000, as amended. A separate report entitled **Response to An Bord Pleanála Pre-application Consultation Opinion** is submitted under separate cover, to address the specific matters raised by ABP in their Notice of Pre-Application Consultation Opinion (case ref. ABP-307178-20) issued on the 4<sup>th</sup> August 2020 in relation to the proposed development.

## 1.2 Regeneration Area

The site is identified in the Dublin City Development Plan (DCDP) 2016-2022 as forming part of Strategic Development Regeneration Area (SDRA 12), St. Teresa's Gardens and Environs, which also includes Dublin City Council lands, part of the former Bailey Gibson site and the Coombe Hospital. An indicative distribution of land uses is presented in the DCDP, see **Figure 7**.



**FIGURE 7 SDRA 12 BOUNDARY (SOURCE DCDP 2016-2022)**

The overall guiding principles for development of the SDRA 12 is established in the DCDP and is reproduced below.

- *The development of a network of streets and public spaces will be promoted to ensure the physical, social and economic integration of St Teresa's Gardens with the former Player Wills and Bailey Gibson sites, with further integration potential with the sites of the Coombe Hospital and White Heather Industrial Estate*
- *A vibrant mixed-use urban quarter will be promoted with complementary strategies across adjoining sites in terms of urban design, inter-connections and land-use. To provide for an area zoned sufficient in size to accommodate a minimum 80 m by 130 m playing pitch.*
- *A new public park is proposed as a landmark feature with passive supervision by residential and other uses; it will have a comprehensive landscaping strategy to provide significant greenery within the scheme and will make provision for a diverse range of recreational and sporting facilities for use by the wider neighbourhood.*
- *There is potential for one or two midrise buildings (up to 50 m) within the site, subject to the criteria set out in the standards section of this plan. To acknowledge the existing sports lands of St Teresa's gardens and its environs and act to retain and augment these lands as sporting facilities for the benefit of the wider community and use by local sports clubs. That at least 20% of the SDRA 12 be retained for public open space, recreation & sporting facilities including an area to facilitate organised games.*

- *Strong permeability through these lands will be encouraged to generate movement and activity east-to-west (connecting Dolphin's Barn Street and Cork Street with Donore Avenue) and north-to-south (connecting Cork Street and Donore Avenue with the South Circular Road and Grand Canal corridor); a high-quality public domain, provision of pedestrian and cyclist routes and provision of active streets will be promoted.*
- *A community hub will be incorporated into the scheme to provide a wide range of community facilities accessible to the wider neighbourhood; opportunities to highlight the heritage of the local area by proposing community uses close to important landmark buildings such as St Teresa's Church will be promoted.*
- *Provision shall be made for the expansion of St Catherine's National School, Donore Avenue, in the redevelopment of the former Player Wills site, subject to agreement with the Department of Education and Skills.*

These requirements and principles for the planning and development of SDRA 12 are further developed in a non-statutory plan prepared by DCC, Development Framework for St. Teresa's Gardens and Environs (2017), henceforth referenced as 'Development Framework'.

### 1.3 Proposed Development

The design rationale is to create and deliver a high quality sustainable mixed-use development within this strategic infill site which respects its setting and maximises the site's natural attributes, while achieving maximum efficiency of existing infrastructure.

A full description of the proposed development is set out in Section 5 of this report. Briefly, the proposed development is residential led encompassing 732 BtR new homes (492 no. apartments and 240 no. single occupancy shared accommodation private living spaces) with a mix of community, social, cultural and retail (inc. food and beverage) uses distributed across 4 no. buildings (PW 1, 2, 4 and 5). The buildings are set amidst public parks and residents' communal open space, that take the form of courtyards and roof level terraces.



FIGURE 8 PROPOSED SITE LAYOUT

To promote permeability, both within the site and through to the wider regeneration lands, a network of new streets with access from the surrounding road network, South Circular Road (SCR) and Donore Avenue is proposed. Car parking is predominately provided within a double basement under building PW2.

Tenant amenities and facilities and non-residential uses including co-working office, retail, café/bar and restaurants are proposed in buildings PW1 and PW2.

Floor space to support community, arts and cultural uses is proposed at ground floor in PW1, the former factory building, with the existing courtyard retained as public space for hosting performances and markets.

A creche, capable of accommodating 49 no. children is located adjacent to the proposed 'St. Catherine's Park', a children's playground.

## 1.4 Masterplan

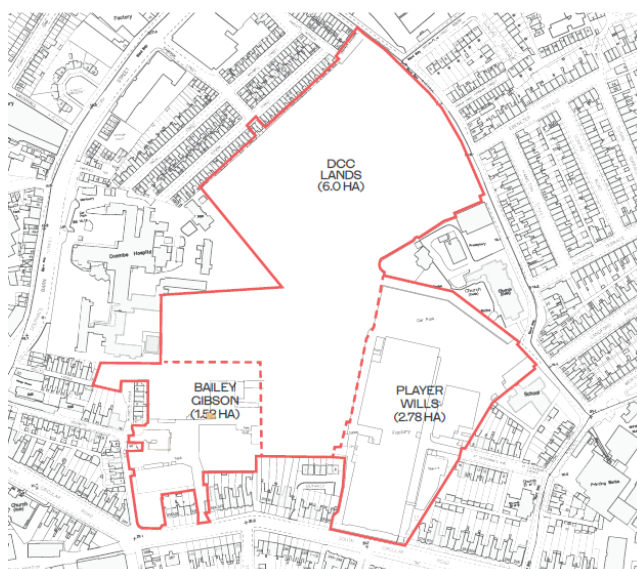
A non-statutory **Masterplan** prepared by Dublin City Council and the Applicant accompanies this application. The Masterplan establishes broad development parameters and envisages the delivery of 2,275 units across the 3 no. sites, a multi-sport playing pitch, public park, local parks distributed across the lands in a permeable setting.

The stimulus for the preparation of the Masterplan was two-fold:

- i. Since the adoption of the extant DCDP and the publication of the non-statutory Development Framework, national planning policy has changed. The publication of Project Ireland 2040 - National Planning Framework and the Eastern and Midlands Regional Spatial Economic Strategy together with Ministerial Guidelines including Guidelines on Urban Development and Building Heights for Local Authorities and the Design Standards for New Apartments – Guidelines for Planning Authorities both published in 2018 have materially impacted the planning and development context for the regeneration lands.
- ii. The coming into single ownership of the Player Wills and Bailey Gibson sites.

The Masterplan provides a framework for an integrated approach to the redevelopment of this strategically located urban block and aims to secure physical, social and economic regeneration of the area. It is cognisant of national planning policy which requires strategically located sites to be developed in an efficient and effective manner, to optimise their development potential, with regard to scarce urban land and the need to increase housing supply.

The Masterplan lands comprise 3 no. land parcels with a total area of 10.3 hectares, namely: DCC lands, Players Wills and the former Bailey Gibson lands. It is noted that while these lands share internal boundaries, there are no existing linkages between the individual plots.



**FIGURE 9 MASTERPLAN LANDS**

The preparation of the Masterplan represents Dublin City Council's and the Applicant's commitment to securing the regeneration objective for SDRA 12 and realising the established guiding principles highlighted in the Development Framework, including;

- Delivering a high quality, high-density residential led mixed-use quarter with complementary uses.
- Promoting a mix of tenure and residential unit types.
- Sensitively developing the interface of the Masterplan lands with surrounding existing low-rise residential dwellings.
- Increasing the scale of development toward the centre of the Masterplan lands.
- Providing generous, well designed, attractive, multifunctional public open space with good orientation, connectivity, and passive and active supervision.
- Integrating a municipal playing pitch.
- Defining the public realm and public and private open space.
- Using appropriate boundary treatments to define and secure private space.
- Promoting active streets through integration of ground floor entrances and aligning commercial space with existing surrounding roads.
- Incorporating generous pedestrian zones and limiting surface level carparking.
- Developing a comprehensive soft landscaping strategy.
- Developing a network of street and public spaces to ensure the social and economic integration of St. Teresa's Gardens with Player Wills and Bailey Gibson sites and the surrounding area.
- Ensuring north/south (Cork St. & Donore Avenue connection to South Circular Road) permeability and east/west (Dolphin's Barn Street and Cork Street) is achieved.
- Providing a range of community facilities accessible to the wider community, including sports facilities.
- Management of surface water using a softer green approach for all developments with an emphasis on an integrated design strategy with landscaping proposals to provide Sustainable Environmental Infrastructure.
- Highlighting the heritage of the local area.
- Providing for the future expansion of St. Catherine's National School.
- The mix of land uses identified in the 2017 Framework Plan are being maintained. They include residential, commercial, public park/open space, multi-sport area, private open space, playgrounds and new school.



This application seeks permission for the development of the majority of the former Player Wills site. The former Bailey Gibson site recently received approval for a mixed use SHD from An Bord Pleanála (PL29S.307221). Development is also permitted on the St. Teresa's Garden site and works are underway.

It is understood that there will be future development proposals for the wider Masterplan lands and for lands contiguous with the Masterplan. These will be subject to separate development consent processes.

### **1.5 Supporting Documentation**

It is noted that this application for permission is accompanied by a comprehensive suite of supporting information, including an Environmental Impact Assessment Report (EIAR) and the full submission should be read in conjunction with this Planning Statement.

## 2. Site Description and Context

### 2.1 Site Location & Description

The proposed development site (3.06 hectares) is located to the north of South Circular Road, east of Cork Street and to the southwest of Donore Avenue in Dublin 8. It is approximately 2.2km southwest of Dublin city centre and within the canal cordon.

The former Player Wills site is occupied by vacant industrial buildings and the DCC lands comprise undeveloped disused amenity lands. The factory was built c.1935 and is a detached nine-bay three-storey art-deco building, arranged around a central courtyard with projecting end-bays. While not a listed protected structure, it does have industrial architectural merit and this is fully described in the **Architectural Design Statement** and in Chapter 14, Cultural Heritage: Built Heritage of the **Environmental Impact Assessment Report** (EIAR) that accompany this application. The structure is attributed a rating of 'Regional' significance by the NIAH, under the special interest categories of Artistic, Architectural, Historical and Social. The NIAH Appraisal of the building reads:

*"Built to designs by Beckett & Harrington for W.D. and H.O. Wills in 1935, this building remained in use as a tobacco factory until 2005. Its form, scale and design make it an imposing presence on South Circular Road, and its obviously industrial function creates a striking contrast to the predominantly domestic architecture of the street. One of the rare surviving examples of the Art Deco style in Dublin, the render consoles and frieze are typical features of this style. A modernist influence can be seen in the expansive glazing to the front, and a strong sense of symmetry is created by projecting end-bays and a central breakfront. Cast iron gate screens flanking the building are of technical and aesthetic interest, adding to the overall character of the composition."*

The site has frontage to South Circular Road to the south, St. Catherine's Avenue to the east and Donore Avenue to the north east. It adjoins the former Bailey Gibson site to the west and St. Teresa's Gardens is to the northwest.

Land uses in the surrounding area comprise residential, commercial, medical, recreational, community and educational uses, as indicated in **Figure 10** below. The Coombe Maternity Hospital is situated north-west of the subject site, immediately adjoining the DCC lands. St Catherine's National School and St Catherine's Church are located to the east on lands adjacent to SDRA 12. St Teresa's Gardens is located to the north-west of the subject site.



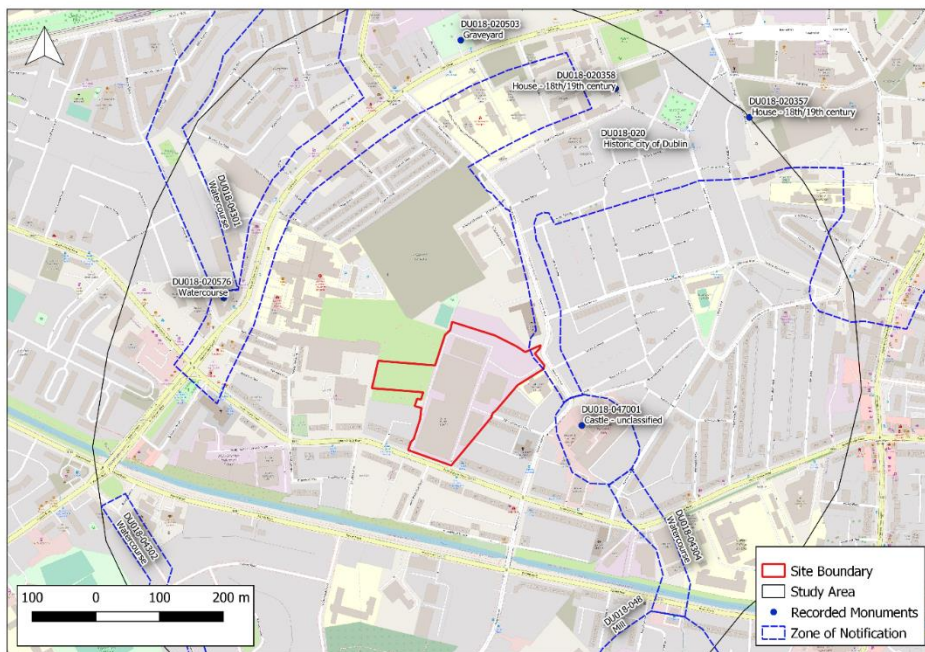
FIGURE 10 SURROUNDING LAND USES

Donore Avenue, St. Catherine's Avenue and SCR are established suburban areas and occupied by low rise period dwellings, that are largely zoned Z2 in the DCDP, Residential Neighbourhoods (Conservation Areas) with a general objective "to protect them from unsuitable new developments or works that would have a negative impact on the amenity or architectural quality of the area." These terraced houses are included on the NIAH, with a rating of 'Local' significance.



**FIGURE 11 EXISTING TERRACED HOUSING ON THE SOUTH CIRCULAR ROAD**

There are no protected structures either on or contiguous to the site. A small section of the north eastern end of the application area, where connection is sought to the municipal storm water drainage network on Donore Avenue, is located within the designated zone of archaeological notification for the historic city of Dublin (DU 018-020).



**FIGURE 12 ZONE OF ARCHAEOLOGICAL NOTIFICATION**

Protected Structures within the immediate area include the Church of St. Catherine and St. James, Donore Avenue, Donore Castle, Our Lady of Dolours Church, and the Dublin Mosque and Islamic Information Centre, all of which are within a c. 350m radius.

Cork Street is situated to the north-west of the subject site. It is a major thoroughfare to the City Centre and is flanked with an eclectic mix of architectural styles with traditional buildings pepper potted with modern development. A period of redevelopment between 2003 and 2010 produced some notable new buildings and brought new residents to the street, with large residential schemes such as Timberyard and Southgate. The street together with Newmarket Square is in a state of transition and is now undergoing a second phase of regeneration with mixed use development and a concentration of student accommodation and hotels in buildings of increased height relative to the traditional existing building stock in the area.

Notably, the Cork Street/ Marrowbone Lane/Donore Avenue junction and environs is a commercial hub for the wider area, and it is important that this is not undermined.

## 2.2 Connectivity

The subject site is well connected in terms of road and public transport links, see **Figure 13**. Fatima LUAS stop is c.900m north-west of the site (12-minute walk time), while South Clondalkin QBC connecting the site with the city centre and south-western suburbs of Dublin extends along Cork Street and Dolphin's Barn Street and is situated c.200m to the west (2-4 minute walk).

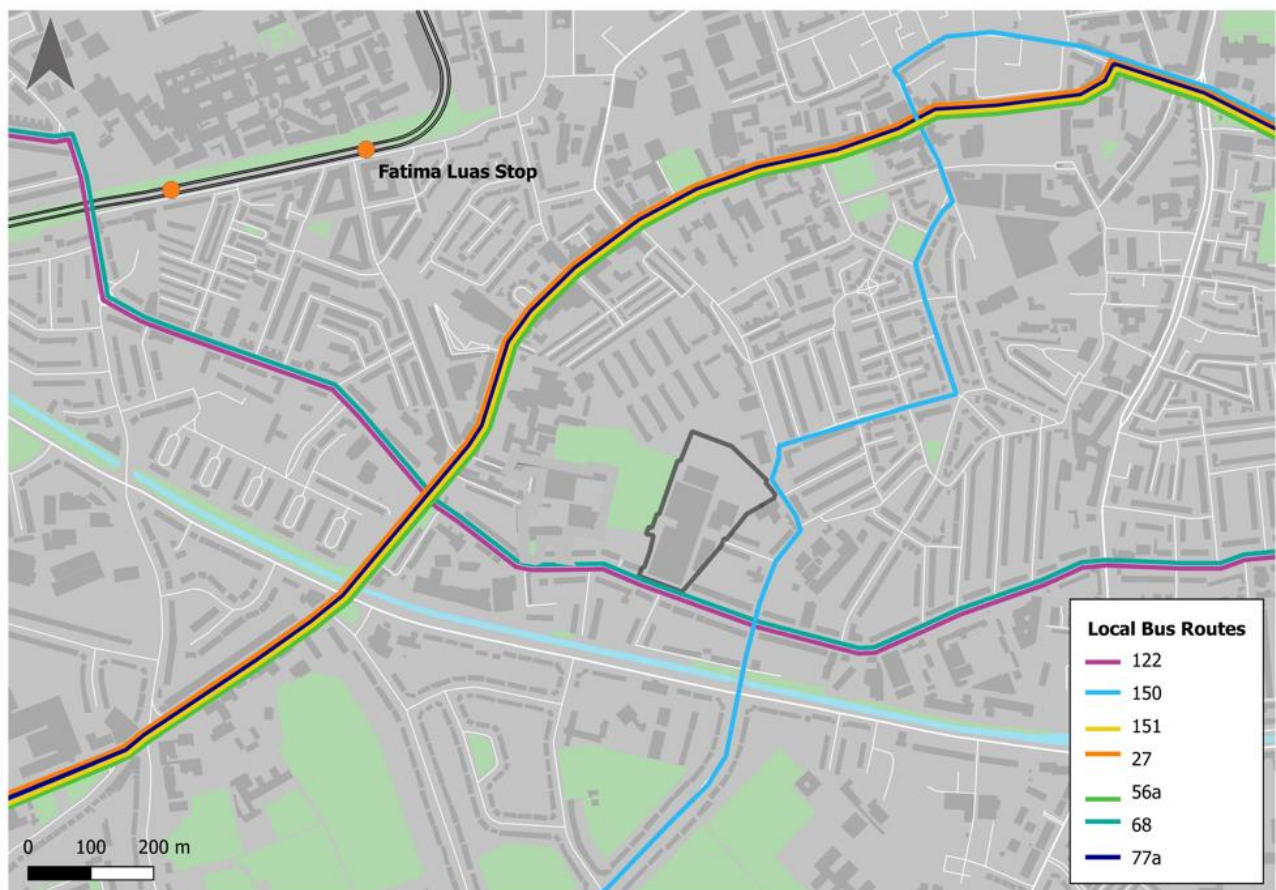


FIGURE 13 SITE CONNECTIVITY

The area is well served by Dublin Bus, with the nearest bus stops being c.45m from the site on the northern side of South Circular Road and c.64m away on the southern side of South Circular Road. These bus stops provide connections to the city centre, Ashington in north Dublin, Drimnagh to the south-west and Greenogue Business Park to the west.

Additional high frequency bus services are also available along the nearby QBC at Dolphin's Barn Street/Cork Street, where the nearest bus stops are located c.385m and c.435m away on the eastern and western sides of the QBC respectively. These bus stops are served by routes 17 and 17D (Rialto to Blackrock station), 27 (Jobstown to Clare Hall), 56A (Tallaght to Ringsend Road), 77A and 77X (Citywest to Ringsend Road) and 151 (Foxborough to Docklands), connecting the subject site with Dublin city centre and the greater Dublin metropolitan area.

### 2.3 Social Infrastructure

A **Social Infrastructure Audit** (SIA) was undertaken by McCutcheon Halley Planning and accompanies this application under separate cover. The SIA identified a large number of community facilities within a 1km buffer of the subject lands.

A number of sports and leisure facilities are located in the area providing recreational opportunities for a wide population, see **Figure 14**. These comprise sports clubs including Synge Street Templeogue GAA Club, Clogher Road Sports Centre, St Teresa's Football Club, St Catherine's Sports Club, Donore Boxing Club and the National Stadium.

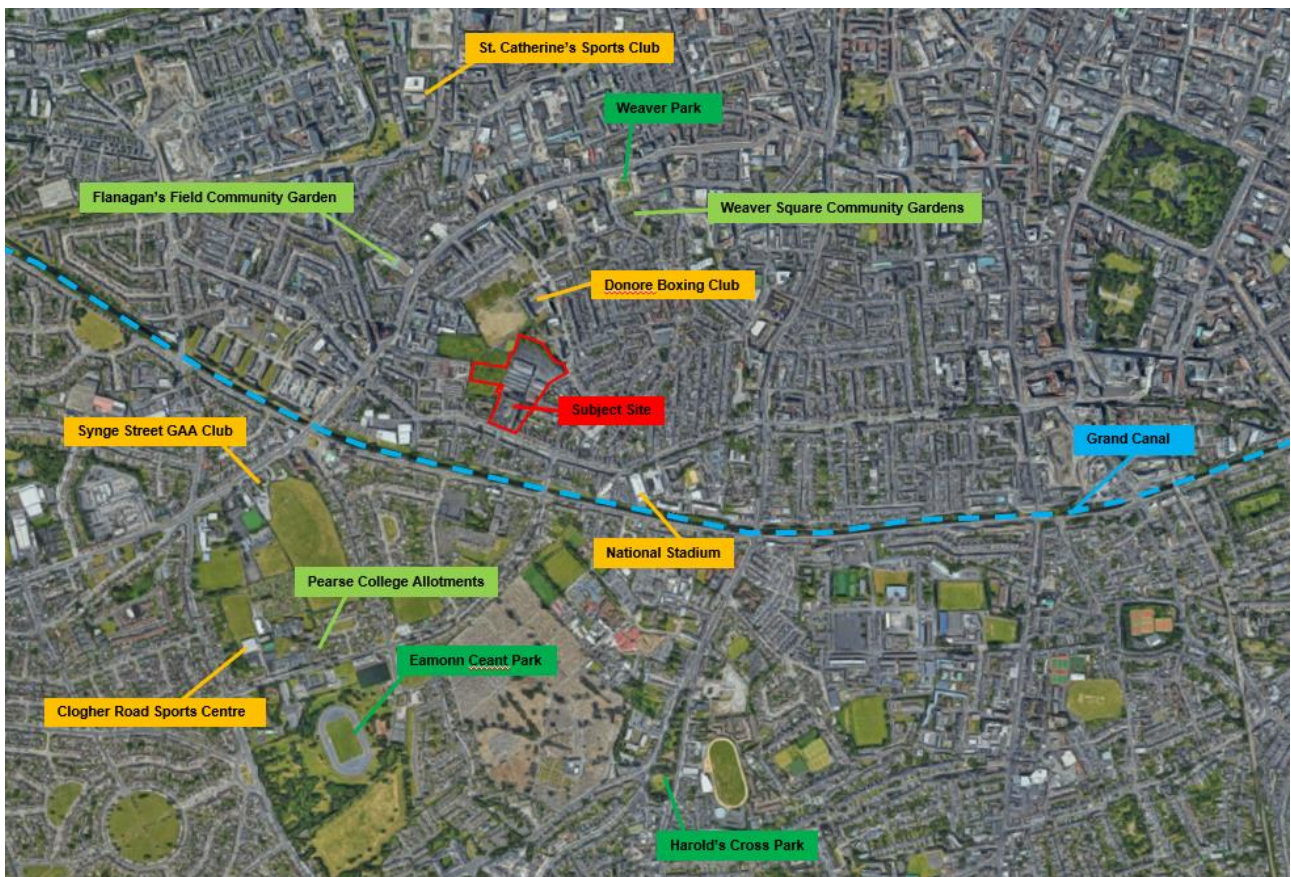


FIGURE 14 LOCAL RECREATIONAL FACILITIES

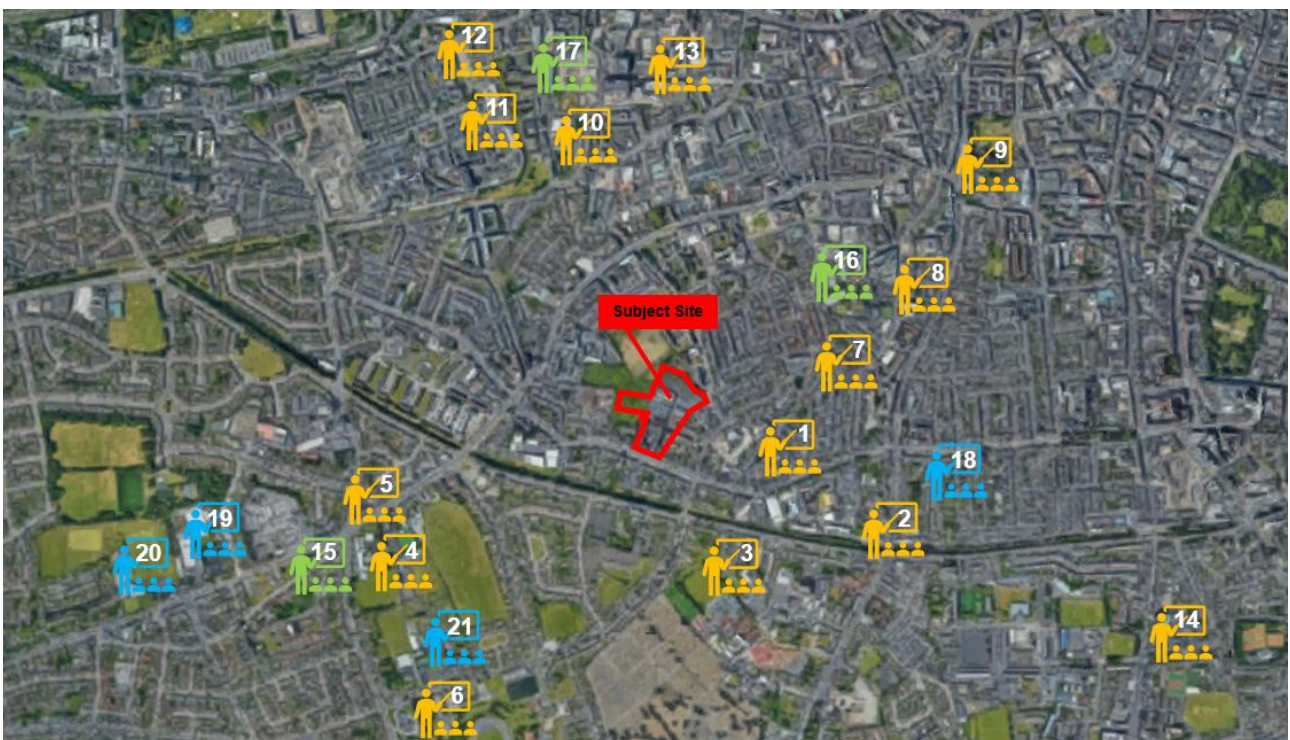
Several parks containing children's playgrounds are also located nearby including Eamonn Ceant Park, Harold's Cross Park and Weaver Park. A number of allotments and community gardens are situated in close proximity to the subject site including Pearse College Allotments, Weaver Square Community Gardens and Flanagan's Fields Community Garden. The Grand Canal is another significant recreational asset within the vicinity of the subject site.

In addition to the above, this application includes 2 no. public parks, 'Players Park', and a children's play park, 'St. Catherine's Park'.

The SDRA 12 designation includes a playing pitch on DCCs lands and this will be subject to a separate application for permission.

The proposed development site is also accessible to a large number of educational facilities encompassing primary, post-primary and third level establishments, see **Figure 15**. In total, the SIA identified 14 no. local primary schools, 3 no. post primary schools and 4 no. third -level educational establishments, all of which are identified in **Table 1**.

Notably, the proposed development site includes an area to the northeast, adjacent to St. Catherine's National School, that is reserved for the future expansion of the school. This area will act as a temporary public park (separate to the proposed St. Catherine's Park) until such time as development consent is secured for the school's expansion by the Department of Education and Skills.



**FIGURE 15 LOCAL EDUCATIONAL FACILITIES**

	No.	Educational Establishment	Location
Primary School	1	St Catherine's National School	Donore Avenue, D8
	2	Griffith Barracks School	South Circular Road, D8
	3	Scoil Iosaigh	Crumlin Road, Dublin 12
	4	Scoil Mhuire Og1	Crumlin Road, Dublin 12
	5	Loreto Primary School	Crumlin Road, Dublin 12
	6	Marist National School	Clogher Road, Crumlin, D12
	7	Scoil Treasa Naofa	Petrie Road, Merchant's Quay, Dublin
	8	Presentation Primary School	Clarence Mangan road, Warrenmount, D8
	9	St Brigids Primary School	The Coombe, The Liberties, Dublin
	10	Canal Way Educate Together N.S.	Basin Lane, James' Street, Dublin
	11	St James Primary School	Basin View, Ushers, Dublin
	12	Mater Dei National School	Basin Lane, James' Street, Dublin
	13	St Catherine's Primary School	Crane Street, Ushers, Dublin
	14	St Clare's Convent N.S.	Harold's Cross, Rathmines
Post Primary	15	Loreto College	Crumlin Road, Crumlin, D12
	16	Presentation Secondary School	Clarence Mangan Road, Warrenmount
	17	Christian Brothers Secondary School	Basin View, Ushers, Dublin
Third Level	18	Griffith College	South Circular Road, D8
	19	Crumlin College	Crumlin Road, D8
	20	Pearse College	Crumlin Road, D8
	21	St Kevin's College	Clogher Road, D12

TABLE 1 LOCAL EDUCATIONAL FACILITIES

## 3 Planning History

### 3.1 Proposed Development Site

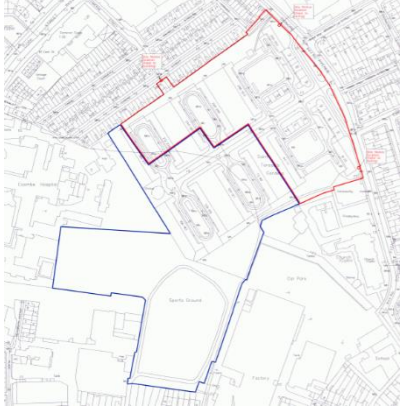
Records identify 1 no. planning application relating to the proposed development site, ABP PL29S.221190, DCC Reg. Ref. 3130/06 which was approved in 2008 and has now lapsed. A summary of the development proposal is provided in the Table below. Notably, DCC permitted the demolition of the factory building, while the Board's decision conditioned the retention of the front three bays. This permission confirms that the site is suitable for mixed use, high density development and the proposed retention of the original fabric of the former factory building is consistent with the Board's decision.

Application Reference	Development Description	Decision	Notes
3130/06	Mixed use residential and commercial development comprising 484 No. residential units, 15 No. commercial/retail units, 2071sq.m offices, a school building, creche, community centre and ancillary site works.	DCC Granted Permission 29 November 2006  ABP <b>Grant Permission</b> (Ref. PL29S. 221190) 11 April 2008	The application was the subject of a third-party appeal and permission was granted by ABP with revised conditions.

TABLE 2 PROPOSED DEVELOPMENT SITE'S PLANNING HISTORY

Separately DCC have secured development consent through the Part 8 approvals process on lands adjacent to the proposed development area. A review of the records demonstrated that the subject site does not form part of those permissions. The Part 8 approvals highlight that the delivery of a new urban park providing passive and active recreational uses and children's play facilities is appropriate.



Application Reference	Development Description	Decision	Notes
2033/14	<p><b>Part 8 Application</b></p> <p>Proposal: works at St. Teresa's Gardens, Donore Avenue (area of subject lands c.2.3 hectares) -to facilitate the proposed regeneration of the lands and the upgrading of the existing housing stock. The works proposed under this VIII procedure comprise: The demolition of 3 no. single storey terraced houses on Eugene Street (no's 23, 24 and 25); the closure of the eastern section of Darley's terrace including the relocation of the existing ESB substation. *Note Dublin City Council proposes initiating an extinguishment of a public right of way / road closure process over this section of Darley's Terrace in 2014 to facilitate the new development. The construction of 50 no. new residential units, including balconies/terraces, comprised of 16 no. apartments ranging between 3-5 storeys in height and 34 no. terraced houses ranging between 2-3 storeys in height. revisions to the construction and refurbishment work to 2 no. existing four storey apartment blocks (previously approved under Part VIII Ref 2756/13) to now refurbish 60 no. existing units (including amalgamation of 11 no. units to provide 8 no. larger units) providing 57 no. refurbished units. The provision of a new urban park providing passive and active recreational uses and children's play facilities. Other works include the provision of a new road network comprising an entrance/ road from Donore Avenue and a route/ entrance from Eugene Street to the application site; and ancillary and associated enabling/site works including hard and soft landscaping, on-street car parking, boundary treatments, gates, bin stores, private gardens/courtyards, CCTV security and public lighting.</p>	<p><b>DCC Granted Permission</b> 12<sup>th</sup> May 2014</p>	<p>The proposed site layout demonstrates that the area of DCC lands included in this subject application did not form part of this development proposal.</p> 

<p><b>2475/18</b></p>	<p><b>Part 8 Application</b>          Proposal: amend the previously permitted development comprising 50 no. units (16 no. apartments, 24 no. 3 bedroom terraced houses and 10 no. 2 bedroom terraced units - Planning ref 2033/14) to allow for the construction of an additional 4 no. terraced residential units and associated works; amendments to the design of 12 no. previously permitted units; development of a temporary grass multisport pitch in addition to the previously permitted park development (Phase A); demolition of 2 no. existing flat blocks to facilitate the future provision of a landmark park (Phase B) with full size multisport pitch and associated works at St. Teresa's Gardens, Donore Avenue, Dublin 8 as follows:          Additional residential units: 4 no. 3 bedroom terraced units - as an extension of the previously permitted 3 storey terrace. Total proposed residential development of 54 no. units (including the additional 4 no. units) comprising 16 no. apartments, 28 no. 3 bedroom terraced units and 10 no. 2 bedroom terraced units. Amendments to 12 no. previously permitted residential units: 6 no. 2 bedroom 3 storey terrace units (type E1 and F1) to be amended to 6 no. 2 bedroom 3 storey terraced units (B1 to B6). 4 no. 2 bedroom 2 storey terrace units (type D1) to be amended to 4 no. 2 bedroom two storey terraced units (D1 to D4). 2 no. 3 bedroom 3 storey units (type A) to be amended to 2 no. 3 bedroom 3 storey units (C1 and C2). Demolition of 2 no. four storey flat blocks comprising: 56 no. residential units (35 no. 1 bedroom units, 14 no. 2 bedroom units, 7 no. 3 bedroom units), a football club premises, boxing club premises/changing facility and a shop premises to facilitate the future development (Phase B) of an enlarged park and multisport playing pitch in accordance with the 2017 Development Framework for the SDRA 12 lands. Development of a temporary grass multisport pitch and associated works (in addition to the previously approved park - Phase A).</p>	<p>DCC Granted Permission           11th June 2018</p>	<p>This amending application does not overlap with the proposed development site.</p>
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**TABLE 3 PART 8 APPROVALS**

### 3.2 Permissions in the Wider Area

Applications of note in the immediate wider area have been identified and are presented in **Table 4**. The geographical distribution of these development sites to the north and west of the Player Wills site, in and around Cork Street, reflects the rapidly changing nature of this highly accessible area. These approved developments reflect the transitional character of much of the surrounding locality, as opportunities for redevelopment are presented and future proposals align with evolving national and local policy objectives.

The Bailey Gibson decision relates to lands owned by the Applicant and the Board determined that subject to compliance with conditions of the permission, the development would constitute an acceptable quantum and density (272 units per hectare nett) of development in an accessible location, and would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian safety. Accordingly, it was determined that the development would be in accordance with the proper planning and sustainable development of the area.

Notably, the Board determined that having regard to section 37 (2) of the Planning and Development Act, 2000, as amended, the grant of permission in material contravention of the Development Plan was justified, having regard to the fact that the development is of strategic or national importance in terms of increasing the supply of housing and achieving national planning policy objectives regarding compact growth and urban regeneration and in the context that it complied with development management criteria established in section 3.1 and 3.2 of the Building Height Guidelines.

Of the 7 no. permissions set out in the Table below, 4 no. relate to the provision of student accommodation with a combined total of 1,234 student bed spaces. The proposed development would diversify the type of development in Dublin 8 and assist with overcoming an over concentration of any one type of development.

Application Reference	Development Description	Decision
PL29S.307221	<p><b>Strategic Housing Development</b></p> <p><b>Bailey Gibson:</b> Demolition of existing structures and construction of 416 residential units in five blocks ranging in height from 2 storeys to 16 storeys together with tenant amenities, a creche and commercial floorspace to facilitate a restaurant/café/bar at ground level in Block BG2 and commercial floorspace at ground floor level in Block BG1 to facilitate a range of uses including Class 1 (shop), Class 2 (financial/professional services) , Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall).</p>	ABP granted permission 14 <sup>th</sup> September 2020
<p>3323/17</p> <p>PL29S.300431</p> <p>IDA Ireland, Newmarket Dublin 8</p>	<p><b>Mixed use – residential, commercial &amp; cultural</b></p> <p>The proposed development is arranged in 4 no. blocks enclosing a central courtyard above lower ground level and double basement. The proposed development proposes the demolition of all existing buildings on site and the redevelopment of the site for mixed use purposes. Details include:</p> <ul style="list-style-type: none"> <li>• A basement to provide 112 car parking spaces together with 195 no. bicycle parking spaces;</li> <li>• A western block (a part 5, part 7 and part 8-storey building) over lower ground and basement levels providing a hotel (7,797.72 sq.m GFA);</li> <li>• A southern block (part 5- and 6- storey building over basement comprising 743.71 sq.m (GFA) of retail floorspace at ground floor level and 34 no. residential units on the upper floor;</li> <li>• A northern block (part 7- and part 8- storey building) over lower ground and part double basement providing 58 no. residential units;</li> <li>• The eastern block is a part 4-, part 5- and part 6-storey building over lower ground and basement levels providing 7,346.00 sq.m (GFA) of office floorspace;</li> <li>• Landscaping measures in the courtyard and areas of public realm; and</li> <li>• A single storey artist studio unit of 44 sq.m (GFA)</li> </ul>	<p>DCC granted permission</p> <p>ABP granted permission on appeal</p> <p>13 July 2018</p>
<p>3475/14</p> <p>PL29S.244805</p> <p>Mill Street, Newmarket, Dublin 8</p>	<p><b>Mixed-use student accommodation, office, retail and restaurant / event space</b></p> <p>The proposed development is arranged in a total of 5 new blocks (A, B, C, D, E) which range in height from 4 no. storeys to 7 no. storeys with setbacks at various levels, and a basement plant area (313 sq.m) under Block C (located centrally within the site).</p> <p>The proposed development comprises a mixed-use student accommodation, office, retail and restaurant / event space with development totalling 18,796 sq.m (GFA), including:</p> <ul style="list-style-type: none"> <li>• Restoration of No. 10 Mill Street (Protected Structure) and the adjoining former Mission Hall;</li> <li>• 96 no. student accommodation units (including 36 no. studio units), providing a total of 406 no. student bed-spaces;</li> <li>• Ancillary student accommodation facilities including social space, gym, laundry facilities, management office (15,093 sq.m GFA);</li> </ul>	<p>DCC granted permission</p> <p>ABP granted permission on appeal</p> <p>01 September 2015</p>

	<ul style="list-style-type: none"> <li>• Provision of a single storey pavilion building for student and community uses (65 sq.m);</li> <li>• 4 no. retail/ commercial units; ranging in size from 35 sq.m to 201 sq.m (GFA 539sq.m);</li> <li>• New office space (2,137 sq.m GFA);</li> <li>• Restoration, adaptation and reuse of No. 10 Mill Street as a restaurant/ café/ multi-purpose event space (507 sq.m); and</li> <li>• Mission Hall for office use (520 sq.m GFA).</li> </ul>	
<p><b>2812/17</b></p> <p><b>The 'Brewery Block', Dublin 8</b></p>	<p><b>Mixed-use student accommodation and co-working space</b></p> <p>Permission for development at a 0.4274ha site known as a portion of Brewery Block, bounded by Newmarket, St Luke's Avenue, Brabazon Place/Brabazon Row and Ardee Street, Dublin 8.</p> <p>The site contains a Protected Structure (stone warehouse) at the corner of Newmarket and Brabazon Place/Brabazon Row.</p> <p>The proposed development comprises:</p> <ul style="list-style-type: none"> <li>• Demolition of two existing industrial warehouses (1,236sq.m) and brick ruins (99sq.m);</li> <li>• Retention of the stone warehouse, the brick tower and the existing walls at ground floor level; and</li> <li>• Construction of a three to seven storey mixed-use development in two blocks (11,834sq.m GFA) comprising a co-working shared space with associated cafe/bar; and 349 no. student accommodation bedspaces with associated facilities, which will be utilised for short-term lets.</li> </ul>	<p>DCC granted permission</p> <p>6th December 2017</p>
<p><b>3853/17</b></p> <p><b>PL29S.302149</b></p> <p><b>43-50 Dolphin's Barn Street, Dublin 8</b></p>	<p><b>Mixed-use residential and retail</b></p> <p>The site is bound by Dolphin's Barn Street to the east, No. 51 Dolphin's Barn Street to the north east.</p> <p>The proposed development will include the demolition of the existing former factory building and buildings which front onto Dolphin's Barn Street (Nos. 43-50) and the construction of a part four to part seven storey residential and retail building fronting Dolphin's Barn Street and a basement level car park (13,150 sq.m GFA).</p> <p>The proposed development comprises:</p> <ul style="list-style-type: none"> <li>• 1 no. retail unit at ground floor (1,405 sq.m GFA);</li> <li>• 70 no. apartments from first to sixth floor level comprising 41 no. 1 beds and 29 no. 2 beds (proposed as Build to Let accommodation);</li> <li>• 2 no. residential entrances at ground floor level and communal facilities (410 sq.m GFA);</li> <li>• 67 no. car parking spaces and 18 no. car parking spaces at basement level;</li> <li>• A bike store providing 80 no. bicycle parking spaces and a bin store at ground floor level; and</li> <li>• Landscaping works including a communal open space area at first floor level measuring 693 sq.m.</li> </ul>	<p>DCC granted permission</p> <p>ABP granted permission on appeal</p> <p>24 October 2018</p>
<p><b>3426/18</b></p> <p><b>The Donnelly Centre Phase 2 Building, Cork Street/Brickfield Lane, Dublin 8</b></p>	<p><b>Mixed use - student accommodation and commercial</b></p> <p>The proposal relates to student accommodation development of c.5,231sq.m GFA, to include a retail/enterprise unit at ground floor level (119 sq.m) as well as ancillary areas.</p>	<p>DCC granted permission</p> <p>8th November 2018</p>

	<p>The proposed development will consist of the demolition of the Donnelly Centre Phase 2 (c.728 sq.m GFA) and construction a development comprising:</p> <ul style="list-style-type: none"> <li>• 166 no. student accommodation bed spaces with associated ancillary areas (gym, common room, management, office reception and store room);</li> <li>• A retail/enterprise unit (GFA 119 sq.m) in a five to seven storey high building over basement with frontage onto Cork Street and Brickfield Lane;</li> <li>• Open space within a courtyard at ground floor level (GFA 234 sq.m);</li> <li>• 82 no. cycle parking spaces are proposed at ground floor level; and</li> <li>• A set down parking area and disabled car parking space.</li> </ul>	
<b>ABP 305061</b>	<p><b>Student accommodation</b></p> <p>Strategic Housing Development</p> <ul style="list-style-type: none"> <li>• The demolition of all buildings and structures (c.2,575 sq m) on site with the exception of the front Art Deco section of the building, which will be retained, restored to its original form, and incorporated into the proposed development;</li> <li>• Construction of a mixed-use building (with a total area of c.11,266 sq m) ranging in height from three to seven storeys over basement comprising a student accommodation scheme of 317 No. student beds arranged in 313 No. bedrooms (276 No. 1-bed bedrooms, 4 No. 2-bed bedrooms and 33 No. studios);</li> <li>• Café with an outdoor garden area;</li> <li>• 4 No. open courtyards (3 No. at Ground Floor Level and 1 No. at First Floor Level);</li> <li>• TV lounge; gym; cinema; communal areas; circulation areas; reception; library; and a meeting/event room;</li> <li>• Parking for 160 No. bicycles accessed directly from South Circular Road; 7 No. visitor bicycle parking spaces located to the front of the building off South Circular Road;</li> <li>• Associated works</li> </ul>	<p>ABP Granted Permission</p> <p>15<sup>th</sup> November 2019</p>

**TABLE 4 APPROVED DEVELOPMENT IN SURROUNDING AREA**

### 3.3 Other Relevant Decisions

#### 3.3.1 ABP Ref. PL29S.307217/ DCC Reg. Ref. 4423/19 – Shared Living Accommodation, Dublin 8

In March 2020, Dublin City Council issued a Notice to Grant Permission (Reg. Ref. 4423/19) to TC Fumbally Properties Ltd, for a mixed-use development and Build to Rent Shared Accommodation at 27-29 New Row South, Dublin 8. The site is approx. 1km north east of the proposed development site.

The development, ranges from 4 to 8 no. storeys over basement and includes the re-use and extension of a protected structure and provides 72 no. hotel rooms and 69 no. single occupancy shared accommodation units together with co-working/artistic-creative studios, a restaurant and public community/event space uses at ground floor level.

Of relevance to this subject application are;

- Dublin City Council in assessing the application state that *the “applicant has demonstrated that the proposal would not result in an overconcentration of shared living units in this area as there are no other similar developments within 1km of the site.”*
- The proposed works pertaining to the Protected Structure comprise the removal of unoriginal elements of the building and the part demolition and taking down and reconstruction of some of the extant external and internal dividing walls to form the new build-to-rent shared living accommodation, with a new two storey extension above the Protected Structure. Dublin City Council’s Conservation Officer had no objection to the development subject to conditions.

The decision of Dublin City Council was appealed to An Bord Pleanála (Ref. PL29S.307217) and permission was granted by the Board on the 19<sup>th</sup> November 2020.

### 3.3.2 ABP Ref. PL29S.306742/DCC Reg. Ref. 4568/19: Shared Living Accommodation, Dublin 6

A Notification of Grant of Permission was issued by Dublin City Council to Blondie Issuer Designated Activity Company in November 2019 for a change of use from office use to shared accommodation use at Rathmines House, 143-149, Rathmines Road Lower, Rathmines, Dublin 6. The site is located approx. 1.5kms south east of the proposed development site.

The proposal involves construction of an additional 3 setback floors to be part of the overall shared accommodation development to create a 7-storey building with a total floor area of 4,548 sq.m. The proposal included 110 no. individual units varying in size from 16sq.m to 25sq.m with shared kitchen, dining and living communal facilities on each floor level. In addition, on the ground floor, a reception, gymnasium, residents lounge, laundrette and accessible WC was proposed, together with a café kiosk accessible to the public.

In determining the application, Dublin City Council considered that *“the proposed shared living residential development which is located within walking distance of Rathmines Town Centre and the city centre, in close proximity to public transport and a wide range of amenities, services and multiple employment locations is acceptable in principle at this site.”*

The decision was appealed to An Bord Pleanála (PL29S.306742) and the decision of City Council was upheld. A decision to grant permission was issued in August 2020.

The following observations made by the ABP Inspector are relevant to this subject proposal;

- The Board’s Inspector in assessing the application concluded that there is a requirement and a demand for shared living accommodation associated with employees on 3 to 6 month or one-year contracts.
- The provision of 2 no. shared accommodation schemes in Rathmines with a combined 200 units would not represent overconcentration of shared accommodation facilities in the Rathmines area.

## 4 Pre-planning Consultation

In advance of lodging this application, the Applicant together with the appointed design team, engaged in 5 no. section 247 pre-planning meetings with representatives of Dublin City Council, and 1 no. pre-application consultation (PAC) meeting with An Bord Pleanála, in advance of lodging this application.

This section outlines the matters highlighted during pre-planning discussions with Dublin City Council. All matters were given due consideration by the Design Team in the proposed development as submitted. Additionally, details of a Public Open Day held by the Applicant are provided.

### 4.1 7<sup>th</sup> May 2019

On the **7<sup>th</sup> May 2019**, representatives of Dublin City Council and the Design Team met to discuss development of lands under the Applicant's control i.e., the former Bailey Gibson site and the Player Wills site. The meeting was attended by representatives from the following departments;

- Planning Department
- Housing
- Transportation
- Infrastructure

Matters raised by City Council representatives that relate to the development of the former Player Wills site include;

- Requirement for the proposed scheme to integrate into the wider SDRA 12 lands;

The proposed development includes an internal street network that provides connectivity with the wider SDRA 12 lands. A link road is proposed to the south of 'Player's Park' to integrate with the former Bailey Gibson site to the west.

The activation of the ground floor of the former factory building for community, arts and cultural, retail and food and beverage uses will act as a community hub for the entire regeneration area and the existing wider community.

The proposed creche is deliberately oversized to accommodate the childcare needs of the wider area.

The inclusion of 2 no. public parks, 'Players Park' and 'St. Catherine's Park' offer an opportunity for residents to integrate and socialise in this new urban area.

- Environmental factors are integral to the scheme's design and careful attention should be paid to daylight/sunlight, visual impact etc.

The layout of the proposed development has been subject to continual testing of daylight, sunlight and overshadowing effects. The **Daylight, Sunlight & Overshadowing** report demonstrates that scheme performs very well against each of these criteria and a high-quality living environment is achieved without significantly impacting the amenity of existing adjoining land uses.

- The street hierarchy and use of open spaces should be defined.

The **Landscape Design Statement** should be referenced for details on this aspect. Briefly, the street hierarchy includes, primary streets, shared surface junctions and shared surfaces/home zones. The proposed 'Players



Park' is designed as a multifunctional passive and active recreational area and 'St. Catherine's Park' is dedicated to play. The communal amenity space associated with each of the buildings is delivered via ground level courtyards and terraces with each encompassing a range of different spaces.

- It was emphasised that taller elements must be of a high-quality design and the Applicant's attention was drawn to the criteria for tall buildings in the City Development Plan. The relationship of taller elements to adjacent lower uses should be considered.

The rationale and justification for the proposed height is developed further in this report, in the **Architectural Design Statement** and in the **Material Contravention Statement**.

- An assessment of the visual impact of the proposed development should be advanced.

The EIAR that accompanies this application includes a **Landscape & Visual Impact Assessment**. A suite of photomontages is also included with the application.

- Further consideration in relation to the transportation strategy and assumptions. The potential for overspill onto the adjacent street network should be given consideration.

The **Traffic & Transport Assessment** fully addresses these matters.

- Regarding surface water drainage, it was highlighted that the strategy should be compatible with the overall SDRA 12 lands and that a 2-stage treatment would be required.

The surface water drainage strategy has been designed in close cooperation with DCCs Drainage Division and is fully compliant with all requirements.

- Noted that flood risk should be addressed in supporting documentation.

The **Infrastructure Report** includes a Flood Risk Assessment. It concludes that the site is within Flood Zone C and the development would not increase flood risk elsewhere. The proposed development is thus compliant with The Planning System and Flood Risk Management - Guidelines for Planning Authorities.

## 4.2 2<sup>nd</sup> July 2019

On the 2<sup>nd</sup> July 2019 representatives of Dublin City Council and the Design Team met to discuss development of lands under the Applicant's control i.e., the former Bailey Gibson site and the Player Wills site. The meeting was attended by representatives from the following departments.

- Planning
- Transportation Planning
- Infrastructure
- Parks

Matters raised by City Council representatives that are relevant to the development of the former Player Wills site include;

- Unit mix – justification required in the context of the existing housing stock in the local area.

A justification for the proposed apartment unit mix is appended to this report and a standalone report **Shared Accommodation Demand Report** is also included.

- Zoning – highlighted that Z6 encourages a range of employment uses and advised that the wider commercial context should be considered.

The land-use zoning objective Z14 seeks the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and 'Z6', to provide for the creation and protection of enterprise and facilitate opportunities for employment creation would be the predominant uses.

The proposed development includes non-residential uses at the ground floor of the former factory building (PW1) and in building PW2. Combined there is 701 sq.m of retail floor space, 1,136 sq.m of food and beverage floor space, 217 sq.m of co-working office floorspace, and 852 sq.m of floor space dedicated to community, arts and cultural and exhibition space. A 275 sq.m creche is also proposed. It is estimated that at a minimum 191 no. employment opportunities will be generated.

The scheme also includes a significant quantum of tenant services, amenities and facilities including co-working space, a meeting room and business centre, lounges, TV room, games rooms, a gym, a library, kitchen/dining areas and laundry facilities.

The mix of uses to meet the variety of needs is wide ranging and the substantial quantum of non-residential uses will contribute to a vibrant mixed-use urban quarter.

- Sunlight to Open Space – the design should maximise sunlight to open spaces and reference was made to the BRE target.

This application is accompanied by a **Sunlight, Daylight & Overshadowing Report**. The analysis demonstrates that the proposed public open space, 'Players Park' and 'St. Catherine's Park' will receive sunlight that substantially exceeds the BRE target. Similarly, all of the proposed communal amenity space meets and/or exceeds the requirement for the space to receive at least 2 hours of sunlight over 50% of the area on the 21<sup>st</sup> March.

It is acknowledged that the retained courtyard at the centre of PW1, the former factory building, does not benefit from high levels of sunlight. This is due to the configuration of the existing building and as the overriding objective is to retain the historic original fabric, the sunlight access cannot be improved to this space. Importantly, this courtyard is not relied upon to achieve the minimum standards for communal open space provision. Further, the design has regard to the nature of the space, and it is proposed to cover the area to facilitate performances and markets.

- Daylight – an assessment of the average daylight factor to be included with the submission.

The results of the Average Daylight Factors (ADF) analysis is presented in the Sunlight, Daylight & Overshadowing Report. Across the site 92% of the rooms tested within the proposed scheme have an above the recommended values, exceeding the BRE guidelines. This total would be expected to increase beyond 92% if all of the upper and outer paces across the development were included in the results.

- Height – noted that the proposed height exceeds the Development Plan and Framework Plan for SDRA 12 but acknowledged that there is scope for greater height in the context of the published Height Guidelines.

There are 2 no. tall projections proposed within building PW2. This is consistent with the height strategy presented in the Masterplan. Height is concentrated toward the centre of the development site and tapers down to the site's boundaries. The rationale and justification for the proposed height is developed further in this report, in the **Architectural Design Statement** and in the **Material Contravention Statement**.

- Architectural Expression – highlighted that long, monolithic frontage should be avoided.

The existing façade of the art-deco style, former factory building, will continue to form the frontage to South Circular Road.

Within the proposed development site, careful consideration is given to the architectural expression to avoid uninterrupted frontage along the internal street network. The approach is set out in the **Architectural Design Statement**.

- Visual Impact – an assessment should be submitted demonstrating that the proposed development is acceptable.

The **Landscape and Visual Impact Assessment** forms part of the EIAR that accompanies this application. It is supported by a suite of **photomontages** from near and long-range locations. The **Built Heritage** chapter of the EIAR also assesses the visual impact of the proposed development on sites of heritage value.

- Materiality – queried if brick is proposed and noted that reflective materials in the courtyards would be satisfactory.

The extensive use of brick, especially traditional red brick (as found along South Circular Road) and buff brick (as found in Dolphins Barn and the former Player Wills factory building) complements the development's surroundings but are used with a more contemporary expression of texture and arrangement. The **Architectural Design Statement** includes full detail of the proposed materiality.

- Traffic & Transportation – noted that information on the wider access strategy i.e., on the surrounding road network should be addressed in any supporting documentation. Fire and emergency access to be integrated into the design. The proposed car parking ratio should be justified, and the management arrangements would be an important consideration. It was agreed that a separate technical meeting would be held to discuss roads and transportation issues.

**A Traffic & Transport** assessment is included under separate cover and a robust rationale is provided for the proposed car parking ratio. Given the city centre location and the associated low level of demand for car use, it is appropriate to reduce the ratio of carparking. This is consistent with SPPR 7 (iii) of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) which provides that for BtR development there shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services.

Details regarding car parking management is contained in the **Property Management Strategy Report**.

The appointed traffic consultant, Systra, engaged extensively with DCC Transportation Planning representatives to agree the proposed design in advance of lodging.

- Open Space – noted that there should be an integrated approach to landscaping to include SuDS measures, green roofs and biodiversity. Regarding light to courtyard spaces, it was acknowledged that the lowering of buildings had enhanced sunlight to communal open space. Consideration to be given to the integration of seating and informal play areas in courtyards. Landscaping measures should be applied to the internal street networks. Where street trees are proposed, it would be important to ensure their viability with regard to underground services.
- Infrastructure – SuDS measures to be included in the design and noted that the master planning process would be used to agree drainage matters.

A comprehensive SuDS strategy is included in the drainage design and full details are included in the **Infrastructure Report**. The project engineer, BMCE, and the landscape design architect, NMP, together with the project ecologist, BSM, worked collaboratively during the design development to ensure an integrated approach. The proposed surface water drainage design has been developed in consultation with DCCs Drainage Department and is fully compliant with their requests.

**The Landscape Design Statement** provides full details of the approach to landscaping within the proposed communal amenity areas and public parks. Extensive play and seating opportunities are incorporated and the internal street network benefits from high quality landscaping proposals.

### 4.3 7<sup>th</sup> February 2020

A section 247 pre-planning meeting was held with Dublin City Council on **Friday 7th February 2020**. The meeting was attended by representatives from the following departments;

- Planning
- Conservation

Matters discussed included;

- DCC advised that dual aspect must be compliant with the departmental guidelines.
- It was advised that the proposed landscaping strategy should be integrated with the drainage scheme.
- Regarding the retention, refurbishment and reuse of the Player Wills factory building, a discussion took place between Slattery Conservation Architects and DCCs Conservation Officer. Matters discussed included the number of windows to be retained and the condition of the existing windows; the degree of intervention at ground level in connection with enlarging the windows so as to provide light to the interior. DCC suggested that the approach should be minimalist in form. Generally, DCC supported the proposed factory modifications.
- DCC advised that a set of drawings which would give clarity on the level of demolition, intervention and reuse and retention of existing fabric should be included with the application.
- Regarding PW2, DCC considered that the design required further consideration and highlighted development management criteria in the City Development Plan for taller buildings.

Response:

The 2018 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities establishes the following policy requirement;

*“that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e., on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design. Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective that there shall be a minimum of 50% dual aspect apartments.”*

The proposed development is an inner-city site, within the canal cordon and approx. 2.2kms southwest of the city centre. It benefits from excellent access to high-quality public transport including LUAS and Dublin Bus. It is brownfield in nature and forms part of Strategic Development Regeneration Area 12, St. Teresa’s Gardens. Having regard to the site’s characteristics a dual aspect ratio of between 33% and 50% is considered appropriate.

Across the scheme, 51% of the proposed build to rent apartment units are dual aspect.

The appointed project engineer, BMCE, and the landscape architect, NMP, have collaborated during the design phase to ensure a fully integrated drainage and landscape design. Full details are presented in the **Infrastructure Report** and the **Landscape Design Statement**.

A full set of proposed demolition drawings is included with the architectural drawing suite. The **Architectural Design Statement** and **Chapter 14** of the EIAR also provide a comprehensive narrative on the proposed works to the former factory building.

The development management principles in section 16.7.2 of the City Development Plan set out a performance-based approach to the consideration and assessment of taller buildings (50m+) in appropriate urban locations. These performance based standards are addressed in section 7.2.1 below.

#### 4.4 10<sup>th</sup> March 2020

A section 247 pre-planning meeting was held with Dublin City Council on **Tuesday 10th March 2020**. The meeting was attended by DCC officials from planning and conservation.

Matters discussed included;

- Rationale for the omission of hobs in the shared accommodation element of the scheme.

Response: Including hobs within the private living space would negatively impact the factory's facade as ventilation would be required. This would be contrary to DCCs objective to retain the historic fabric of the factory building.

- DCC highlighted that in the absence of in-room hobs, sufficient communal kitchen space would be required. The Applicant was advised to provide clear detail in the application regarding size of kitchen, layout and capacity.

Response: This detail is provided in section 5.4.3 and 5.4.4 of this report and in the **Architectural Design Statement**.

- Detail of impact of partitions on the factory building windows was sought and relationship to wider mullion on the PW1 building. It is considered that a CGI showing this relationship is therefore required.

Response: This matter is addressed in the **Architectural Design Statement** and internal sectional visualisations are included.

- The dropping of all windows at ground floor of PW1 and associated removal of plinth was discussed.

Response: The dropping of windows on this elevation is appropriate for the proposed uses (food and beverage, retail, community, culture and arts) at ground floor level and facilitates views into the building from the street.

- DCC considered that the towers in PW2 need some refinement on the top elements, particularly the southern tower.

Response: This matter is dealt with in section 7.2 of this report and in the **Architectural Design Statement**.

- Views from the old city should be included with the application.

Response: A suite of **photomontages** is included with this application under sperate cover, they include views toward the site from Trinity College, the Royal Hospital, Kilmainham together with a range of other locations in the wider city area. The impact of the proposed development on these heritage views is presented in Chapter 14 of the EIAR.

- Justification for the proposed mix should be undertaken.

Response: This is a BtR development and in accordance with SPPR 8 (i) of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities there are no restrictions on dwelling mix. Notwithstanding, a unit mix justification for the proposed apartments is included as **Appendix 1** to this report and a standalone report **Shared Accommodation Demand Report** is also included.

#### 4.5 9<sup>th</sup> September 2020

On foot of the pre-application consultation meeting held with An Bord Pleanála, a meeting was held with DCC to inform of proposed amendments to the design arising from the Board's Opinion.

Matters discussed and advise provided was as follows;

##### **PW 1 Shared Accommodation**

- DCC advised that the application documentation should state clearly that the shared living element is single occupancy.
- Clear presentation of proposed kitchens and dedicated co-living amenity to be provided.
- Kitchens - provide details regarding size, typical floor plan, travel distance from private living spaces, and demonstrate how the kitchens will operate, how many people can each serve and cooking stations per kitchen.

Response:

It is confirmed in this application that the proposed shared accommodation is single occupancy. Details relating to the proposed kitchens is provided in section 5.3 of this report and in the **Architectural Design Statement**.

##### **PW1 BtR**

- The Applicant highlighted that it is proposed to include BtR units in PW1.
- DCC advised that there was no objection in principle to this.
- DCC advised that the units at 1<sup>st</sup> floor should be tested for daylight in line with the Opinion received from ABP.

Response:

The rooms at 1<sup>st</sup> floor level have been tested for average daylight factor and the results presented in the **Daylight, Sunlight & Overshadowing Report** that accompanies this application, demonstrate that all rooms are compliant with the relevant standard.

##### **PW1 Sunlight to Courtyard**

- The Applicant advised that the courtyard as it exists does not meet the BRE sunlight requirements and that any development will not improve this. It was highlighted that to achieve improvements, significant interventions to the building would be required and this would affect the building's fabric.
- DCC stated that they would accept that the BRE standards cannot be achieved in this space and noted the planning gain that was achieved by retaining the building.
- DCC reiterated that it is an objective of City Council to retain the building due to its character and quality.
- DCC acknowledged that other proposed communal amenity spaces perform well in terms of sunlight.

Response:

Analysis of sunlight exposure to the existing courtyard highlighted that it is significantly below the recommended BRE threshold value for 50% of the space to receive sunlight over 2-hours on the 21<sup>st</sup> March.

To achieve the minimum BRE Guideline value would necessitate significant interventions to the existing building and the design objective to retain this building of industrial architectural heritage merit would be significantly compromised.

The wider development, as proposed, includes 2 no. public parks that meet and exceed the guidelines value and communal amenity spaces also perform very well. These spaces offer future residents and the wider community a range of alternative amenity areas. Furthermore, the PW1 building features 3 no. roof terraces and the PW1 courtyard is no not relied on for communal open space requirements.

Notwithstanding its inherent sunlight deficiencies, the Design Team recognise that the courtyard can provide significant amenity value, and they have adopted an approach to make the best use of the area having regard to its sunlight.

The proposed design offers the courtyard as a permeable public space and a public through route. It is proposed to partially cover the courtyard to facilitate evening performances, markets and outdoor dining space.

## PW2

- DCC highlighted that the Board's Opinion requested that the slenderness of the proposed two tall elements be addressed in the application.
- DCC welcomed the revised design approach to the upper storeys and considered that the south and north elevations are acceptable. Concerns remained regarding the east and west elevations and the impact on visual amenity. Suggested that the elevations may be streamlined.
- DCC were satisfied with the increase in 2-beds and dual aspect and noted that the daylight assessment should include these units.

Response:

The slenderness ratio of the proposed projections is comprehensively addressed in the **Architectural Design Statement**, and in the **Response to An Bord Pleanála's Opinion**.

Briefly, since the preparation of the Masterplan, the 2 no. projections in building PW2 have been subject to significant refinement. The articulation of the towers in PW2 has been developed to respond to the shared desire for a slender expression, whilst responding to the fundamental demands of building efficiency and the responsible use of resources. By breaking down the mass of each tower into separate elements, an expression of a grouping of taller units is created, each of which is more slender than the target 3:1 ratio.

## PW4

- DCC were satisfied with revised approach of perforated brick and green wall at boundary with adjacent existing development.

## PW5

- DCC were satisfied with the revised proposal to reduce to 2-storey duplex at this location.
- Application documentation to provide detail of windows to rear i.e. obscured glazing.

Response:

Details regarding the rear windows of building PW5 are included in the architectural suite of drawings and in the **Architectural Design Statement**.

## 4.6 Public Open Day

A **Public Open Day** was hosted by the Applicant's over 3 no. days on the 11<sup>th</sup> and 12<sup>th</sup> July 2019 and 12<sup>th</sup> March 2020. The public were notified via leaflet drops, social media and press advertisements. The information presented related to the future development of the Masterplan lands i.e., Bailey Gibson, Player Wills and Dublin City Council lands.

The purpose of the open days was to meet the public and listen to their thoughts, opinions and ideas as well as to show projected timelines for the development and provide people with an insight into the planning application. Members of the project team were present and provided information and answered questions as necessary.

Matters raised by the public at the Open Day related to;

- quantum and quality of open space to be provided within the masterplan lands;
- quantum and type of commercial uses proposed;
- desire for lands to deliver vibrancy and vitality during the day and night;
- capacity of schools locally and future plans for St. Catherine's National School;
- mix of unit sizes and types;
- desire to have impact of construction traffic minimised; and,
- quantification of traffic movements during the operational stage and desire for improved cycling and pedestrian access.



## 5 Proposed Development

The proposed design is derived from the principles for SDRA 12 established in the Dublin City Development Plan 2016-2022, which in turn are developed further in the Development Framework and in the Masterplan that accompanies this application.

Key elements of the design approach are summarised as follows;

- **Enhanced Permeability** - The extensive public realm, has been designed to promote pedestrian activity through the site and optimise connectivity with the existing and planned surrounding street network. These spaces are intended to enhance permeability and enable future connections with the adjoining Masterplan lands.
- **Place-making** – The proposed redevelopment aims to create a sense of place through a range of measures including high quality urban design, a building height strategy that responds to the site’s urban location, significant tenant amenities and facilities and the provision of attractive, vibrant streets and public spaces.
- **Restoration** – The proposed development retains the original historic fabric of the Player Wills factory building and modifies it to provide a vibrant mixed-use building with community, cultural and artistic space, retail, food and beverage and overhead new homes.
- **Sustainability** – The proposed development is intended to promote active modes of travel and contribute to decreased reliance on private vehicles, maximising use of existing infrastructure. Energy efficiency will be promoted through the use of good quality external building materials and insulation, efficient heating systems, use of green roofs and sustainable water use and drainage design.

### 5.1 Development Description

DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV intend to apply to An Bord Pleanála for permission for a mixed-use Build to Rent Strategic Housing Development at the former ‘Player Wills’ site (2.39 hectares) and adjoining lands (0.67 hectares) under the control of Dublin City Council. A public park, public road and works to South Circular Road and to facilitate connections to municipal services at Donore Avenue are proposed on the Dublin City Council land. The former ‘Player Wills’ site incorporates Eircode’s: D08 T6DC, D08 PW25, D08 X7F8 and D08 EK00 and has frontage onto South Circular Road, St. Catherine’s Avenue and Donore Avenue, Dublin 8. The Dublin City Council undeveloped land adjoins the former ‘Player Wills’ site to the west and the former ‘Bailey Gibson’ site to the east. The total area of the proposed development site is 3.06 hectares.

The design rationale is to create and deliver a high quality, sustainable, residential led mixed use strategic housing development within this inner-city brownfield site which respects its setting and maximises the site’s natural attributes while achieving maximum efficiency of existing infrastructure. The Proposed Site Layout is illustrated on Drawing No. PL0003 contained within the architectural suite of drawings.

The development will consist of;

- i. the demolition of all buildings (15,454 sq.m GFA), excluding the original fabric of the former Player Wills Factory, to provide for the development of a mixed use(residential, community, arts and culture, creche, food and beverage and retail) scheme comprising predominantly build to rent apartment dwellings (492 no.) together with a significantly lesser quantity of single occupancy shared

- accommodation private living areas (240 no.), with an average private living floor area of 24.6 sq.m (double the minimum private living space size required for single occupancy shared accommodation) and a arts/culture/community hub within the repurposed ground floor of the former factory building;
- ii. change of use, refurbishment, modifications and alterations to the former Player Wills Factory building (PW1) to include the removal of 1 no. later addition storey (existing 4th storey) and the later addition rear (northern) extension, retention and modification of 3 no. existing storeys and addition of 2 no. storeys set back on the building's south, east and west elevations with an 8-storey projection (max. height 32.53m) on the north eastern corner, with a cumulative gross floor area of 17,630 sq.m including ancillary uses, comprising;
    - a. at ground floor 852 sq.m of floor space dedicated to community, arts and cultural and exhibition space together with artist and photography studios (Class 1 and Class 10 Use), 503 sq.m of retail floor space (Class 1 Use), 994 sq.m of café/bar/restaurant floor space, 217 sq.m of co-working office floor space (Class 3 Use) and ancillary floor space for welfare facilities, waste management and storage;
    - b. 240 no. single occupancy shared accommodation private living areas, distributed over levels 1-4, including 2 no. rooms of 30 sq.m, 49 no. rooms of 25 sq.m; 14 no. rooms of 23 sq.m, 58 no. rooms of 22.5 sq.m, 8 no. rooms of 20 sq.m, 104 no. rooms of 19 sq.m and 5 no. disabled access (Part M) rooms (3 no. 32 sq.m and 2 no. 26 sq.m); 21 no. kitchen/dining areas, and, 835 sq.m of dedicated shared accommodation services, amenities and facilities distributed across levels 1-4, to accommodate uses including lounge areas, entertainment (games) area, 2 no. external terraces (Level 03 and 04), laundry facilities, welfare facilities and waste storage;
    - c. 47 no. build-to rent apartments distributed across levels 1-7 including 12 no. studio apartments; 23 no. 1 bed apartments, 8 no. 2 bed apartments: and 4 no. 3-bed apartments;
    - d. 1,588 sq.m of shared (build to rent and shared accommodation) services, amenities and facilities including at ground floor reception/lobby area, parcel room, 2 no. lounges and administration facilities; at Level 01 entertainment area, TV rooms, entertainment (games room), library, meeting room, business centre; at Level 02 gym and storage and at Level 07, a lounge area.
    - e. Provision of communal amenity outdoor space as follows; PW1 - 450 sq.m in the form of roof terraces dedicated to shared accommodation and 285 sq.m roof terrace for the proposed apartments.
    - f. a basement (190 sq.m) underlying the proposed 8-storey projection to the northeast of PW1 to accommodate plant.
  - iii. the construction of 445 no. Build to Rent apartment units, with a cumulative gross floor area of 48,455 sq.m including ancillary uses distributed across 3 no. blocks (PW 2, 4 and 5) comprising;
    - a. PW2 (45,556 sq.m gross floor area including ancillary uses) - 415 no. apartments in a block ranging in height from 2-19 storeys (max. height 63.05m), incorporating 16 no. studio units; 268 no. 1 bed apartments, 93 no. 2 bed apartments and 38 no. 3-bed apartments. At ground floor, 2 no. retail units (combined 198 sq.m) (Class 1 use), and a café/restaurant (142 sq.m). Tenant services, amenities and facilities (combined 673 sq.m) distributed across ground floor (lobby, mail room, co-working and lounge area), Level 06 (terrace access) and Level 17 (lounge). Provision of communal amenity open space including a courtyard of 1,123 sq.m and roof terraces of 1,535 sq.m
    - b. Double basement to accommodate car parking, cycle parking, waste storage, general storage and plant.
    - c. PW4 (1,395 sq.m gross floor area including ancillary uses) - 9 no. apartments in a part 2-3 storey block (max. height 10.125m) comprising, 2 no. 2-bed duplex apartment units and 7 no. 3-bed triplex apartment units. Provision of communal amenity open space in the form of a courtyard 111 sq.m
    - d. PW5 (1,504 sq.m gross floor area including ancillary uses) - 21 no. apartments in a 4 storey block (max. height 13.30m) comprising 12 no. studio apartments, 1 no. 1-bed apartment, 5

- no. 2-bed apartments, and 3 no. 3-bed apartments. Provision of communal amenity space in the form of a courtyard 167sq.m.
- iv. the construction of a childcare facility (block PW4) with a gross floor area of 275 sq.m and associated external play area of 146 sq.m;
  - v. the provision of public open space with 2 no. permanent parks, 'Players Park' (3,960 sq.m) incorporating active and passive uses to the northwest of the former factory building on lands owned by Dublin City Council; 'St. Catherine's Park' (1,350 sq.m) a playground, to the north east of the Player Wills site adjacent to St. Catherine's National School. A temporary public park (1,158 sq.m) to the northeast of the site set aside for a future school extension. The existing courtyard (690 sq.m) in block PW1 (former factory building) to be retained and enhanced and a public plaza (320 sq.m) between proposed blocks PW and PW4.
  - vi. 903 no. long-stay bicycle parking spaces, with 861 no. spaces in the PW2 basement and 42 no. spaces at ground level in secure enclosures within blocks PW4 and PW5. 20 no. spaces reserved for non-residential uses and 110 no. short-stay visitor bicycle spaces provided at ground level.
  - vii. 4 no. dedicated pedestrian access points are proposed to maximise walking and cycling, 2 no. from South Circular Road, 1 no. from St. Catherine's Avenue and 1 no. from Donore Avenue.
  - viii. in the basement of PW2, 148 no. car parking spaces to serve the proposed build to rent apartments including 19 no. dedicated disabled parking spaces and 6 no. motorcycle spaces. 20 no. spaces for a car sharing club ('Go Car' or similar). 10% of parking spaces fitted with electric charging points.
  - ix. in the basement of PW2, use for 81 no. car parking spaces (1,293 sq.m net floor area) including 5 no. dedicated disabled parking spaces, 3 no. motorcycle spaces and 10% of parking spaces fitted with electric charging points to facilitate residential car parking associated with future development on neighbouring lands. The area will not be used for carparking without a separate grant of permission for that future development. In the alternative, use for additional storage (cage/container) for residents of the proposed development.
  - x. 37 no. surface level car parking spaces including 3 no. disabled access and 3 no. creche set down spaces and 10% fitted with electric charging points. 2 no. loading bays and 2 no. taxi set-down areas.
  - xi. development of internal street network including a link road (84m long x 4.8m wide) to the south of the proposed 'Players Park' on land owned by Dublin City Council that will provide connectivity between the former 'Bailey Gibson' site and the 'Player Wills' site.
  - xii. vehicular access will be provided via Donore Avenue with a one-way exit provided onto South Circular Road to the east of block PW1(the former factory building);
  - xiii. replacement and realignment of footpaths to provide for improved pedestrian conditions along sections of Donore Avenue and South Circular Road and realignment of centreline along sections of Donore Avenue with associated changes to road markings;
  - xiv. a contra-flow cycle lane is proposed at the one-way vehicular exit to the east of PW1 (former factory building) to allow 2-way cycle movements via this access point;
  - xv. decommissioning of existing 2 no. ESB substations and the construction of 2 no. ESB substations and associated switch rooms, 1 no. single ESB substation in PW 1 (43.5 sq.m) and 1 no. double ESB substation in PW2 (68 sq.m);
  - xvi. the construction of a waste and water storage building (combined 133 sq.m, height 4.35m) to the west of building PW1;
  - xvii. all ancillary site development works; drainage, rooftop solar photovoltaics (20 no. panels total), landscaping, boundary treatment and lighting.

An overview of the key development statistics is provided in **Table 5** below.

<b>Development Statistics</b>	
<b>Site Area</b>	3.06 ha (gross) 2.39 ha (under Applicant's control)
<b>No. Units</b>	732 no. units in 4 no. blocks, including: <ul style="list-style-type: none"> <li>• 492 no. apartments in 4 no. blocks (PW1, PW2, PW4 and PW5)</li> <li>• 240 no. Single Occupancy Shared Accommodation Units (PW1)</li> </ul>
<b>Tenant Amenities &amp; Facilities</b>	<ul style="list-style-type: none"> <li>• 835 sq.m in PW1 (dedicated shared accommodation)</li> <li>• 1,588 sq.m in PW1 (apartments &amp; shared accommodation)</li> <li>• 673 sq.m in PW2 (apartments &amp; shared accommodation)</li> </ul>
<b>Non-Residential Uses</b>	<ul style="list-style-type: none"> <li>• PW1 Arts, Cultural &amp; Community Hub, 852 sq.m - Class 1 &amp; 10</li> <li>• PW1 Retail 503 sq.m - Class 1</li> <li>• PW1 Food &amp; Beverage 994 sq.m</li> <li>• PW1 Co-working Office - Class 3</li> <li>• PW2 – 2 no. Retail combined 198 sq.m – Class 1</li> <li>• PW2 – Food &amp; Beverage 142 sq.m</li> <li>• PW2 – 81 no. carparking spaces 1,293 sq.m</li> <li>• PW4 - Crèche (275 sq.m) – Class 8(b)</li> </ul>
<b>Density</b>	239 uph (gross) (including all 732 units on 3.06ha area site) 321 uph (net) (excludes DCC lands and temporary park for school extension)
<b>Building Height</b>	<ul style="list-style-type: none"> <li>• PW 1: 5-8 storeys</li> <li>• PW2: 2-19 storeys</li> <li>• PW4: 3-4 storeys</li> <li>• PW5: 4 storeys</li> </ul>
<b>Apartment Unit Mix Summary*</b>	<ul style="list-style-type: none"> <li>• 8% Studio</li> <li>• 59% 1-Bedroom</li> <li>• 22% 2-Bedroom</li> <li>• 11% 3-Bedroom</li> </ul>
<b>Car Parking</b>	<ul style="list-style-type: none"> <li>• 168 no. Spaces (148 no. dedicated to BtR apartments and 20 no. car share for all residents) &amp; 37 no. surface spaces.</li> </ul>
<b>Bicycle Parking</b>	<ul style="list-style-type: none"> <li>• 903 no. long stay</li> <li>• 110 no. short stay</li> </ul>

<b>Dual Aspect Units</b>	51%
<b>Public Open Space</b>	<p>Players Park (3,960 sq.m)</p> <p>St. Catherine's Park (1,350 sq.m)</p> <p>Temporary Park – School Extension Site (1,158 sq.m)</p> <p>PW1 Courtyard (690 sq.m)</p> <p>Public Plaza (320 sq.m)</p>
<b>Communal Amenity Space</b>	<p>3,671 sq.m (combined) courtyards and roof terraces</p> <ul style="list-style-type: none"> <li>• PW 1 450 sq.m roof terrace (dedicated shared accommodation)</li> <li>• PW1 285 sq.m roof terrace (dedicated apartments)</li> <li>• PW2 1,123 sq.m courtyard &amp; 1,525 sq.m roof terraces</li> <li>• PW4 111 sq.m courtyard</li> <li>• PW5 167 sq.m courtyard</li> </ul>
<b>Plot Ratio</b>	2.19
<b>Site Coverage</b>	31%

**TABLE 5 DEVELOPMENT OVERVIEW**

\*excludes shared accommodation single occupancy

Following in **Table 6** is a breakdown of the proposed development by block showing the number of units and building height.

<b>Block</b>	<b>No. Units</b>	<b>Storeys</b>	<b>Max Building Height to parapet</b>
PW1	287	5 to 8 storeys	32.53m
PW2	415	2 to 19 storeys	63.05m
PW4	9	3 to 4 storeys	10.125m
PW5	21	4 storeys	13.30m

**TABLE 6 UNIT NUMBERS AND BUILDING HEIGHT BY BLOCK**

## 5.2 Mix of Units

SPPR 8 (i) of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities states that for Build to Rent proposals there is no restrictions on dwelling mix.

The total number and mix of BtR units are set out below. It is noted that all of the proposed shared accommodation private living areas are single occupancy.

Building Ref.	Shared Accommodation	Studio	1 Bed Apartment	2 Bed Apartment	3 Bed Apartment	2 Bed Duplex Apartments	3 Bed Triplex Apartments	Total
<b>PW 1</b>	240	12	23	8	4	-	-	<b>287</b>
<b>PW 2</b>	-	16	268	92	38	1	-	<b>415</b>
<b>PW 4</b>	-	-	-	-	-	2	7	<b>9</b>
<b>PW 5</b>	-	12	1	5	3	-	-	<b>21</b>
<b>Total</b>	<b>240</b>	<b>40</b>	<b>292</b>	<b>105</b>	<b>45</b>	<b>3</b>	<b>7</b>	<b>732</b>

TABLE 7 PROPOSED UNIT MIX

Excluding the Shared Accommodation (240 rooms), the proposed mix as a percentage of the overall Build to Rent (BtR) is;

- 40 no. Studios – 8%
- 292 no. 1 Bed Apartments – 59%
- 108 no. 2 Bed Apartments– 22%
- 52 no. 3 Bed Apartments– 10%

## 5.3 Non-Residential Uses

To provide for an attractive mixed-use neighbourhood, a combined 3,181 sq.m of floor space is dedicated to commercial uses distributed across block PW 1 and PW2 as follows.

The ground floor of the former Player Wills building (PW1) will accommodate a wide range of uses including;

- a community hub to support arts and cultural uses that includes studios for artists and photographers (852 sq.m). The class of use assigned to this area is Class 10 (a) art gallery. As this class precludes the sale of works of art and it is considered that a key element of the arts is preparation of work for sale, Class 1, retail is also assigned to this floor area.
- a retail unit (Class 1), 503 sq.m
- a café, bar and restaurant, 994 sq.m
- co-working office floor space (Class 3), 217 sq.m that will accommodate approx. 25 no. workstations.

Within block PW2, 2 no. retail units (Class1) are proposed with a combined area of 198 sq.m and a café/restaurant (142 sq.m).

A childcare facility (Class 8(b)) is proposed in block PW4 and it will accommodate 49 no. pre-school children. This is a greater capacity than the estimated childcare demand (16 no.) generated by the proposed scheme, see **Childcare Demand Report**. This additional capacity will be available to serve the childcare needs of the

wider community. The layout of the creche has been given careful consideration and adequate clear floor space for each age category is provided in line with the Childcare Regulations. A dedicated secure outdoor play area is provided adjacent to the creche. Supporting rooms including a sleep area, kitchens, storage and welfare facilities are all integrated to the proposed design. Provision has been made for convenient drop off parking.

The proposed development includes 81 no. car parking spaces in the basement of PW2 for future residential development within the wider Masterplan area and lands contiguous with SDRA 12, that will be subject to a separate application for permission. It is noted that while residential parking is incidental to the primary purpose of the building, in this case, the proposed 81 no. spaces are included to serve a future development proposal and as such constitute 'other use' for the purpose of this SHD application, as they are not associated with the residential use proposed in this application.

The proposed inclusion of these 81 no. car parking spaces does not assume the outcome of any future application for permission will be successful. The 81 no. car parking spaces will not be set out or used in the absence of a separate grant of planning permission for future residential development within the wider Masterplan area.

Accordingly, an alternative use for this area is proposed (in the event that a future grant of planning permission for residential development is not forthcoming) of storage receptacles (cage/container), see Drawing No. PL1250 and 1251.

In this event, the applicant would be satisfied to accept a condition requiring that the 81 no. spaces together with the circulation area would be used as storage ancillary to the proposed residential development in the event that planning permission for future residential development is not granted before the expiration of the subject planning permission.

### 5.3.1 Employment

The estimated employment that will be generated from the non-residential uses is 191 jobs. This is based on a number of information sources including the Homes & Communities Agency, *Employment Density Guide* (2013) employment density per floor area and the adult:child ratio required in childcare settings. It is noted that a blended employment density of 1 job per 16 sq.m of gross internal floorspace is used with reference to corporate, professional services, financial/insurance and small business workspace.

The Childcare Regulations stipulate adult:child ratios that must be maintained in childcare settings. The proposed creche will generate 27 no. employment positions.

Age Group	No. of Children	Adult: Child Ratio	Staff Required
0-1 year	7	1:3	2
1-2 years	15	1:5	3
2-3 years	12	1:6	2
3-6 years	15	1:8	2
<b>Total</b>	<b>49</b>	<b>-</b>	<b>9</b>

**TABLE 8 CHILDCARE EMPLOYMENT GENERATION**

Land Use	Employment Density sq.m	Proposed Development sq.m	Employment Generated
Community Hub	16	852	53
Co-working Office	16	217	14
Retail	16	701	44
Food & Beverage	16	1,136	71
Childcare	16	275	9
<b>Total Employment</b>			<b>191</b>

**TABLE 9 NON-RESIDENTIAL USES EMPLOYMENT GENERATION**

Applying a future occupancy of 1 person per shared accommodation private living area and studio, 2 per 1-bed and the national household average of 2.75 to all other units the anticipated future population is 1,304.

It is estimated that the proposed development will generate at least 191 on site employment opportunities. Therefore, the proposed development would provide employment opportunities for approx. 15% of the future residents. This is a minimum as the proposed development is a Build to Rent and a management company will be put in place for the operational stage which will generate further employment opportunities within the proposed development.

## 5.4 Shared Accommodation – Amenities, Services & Facilities

### 5.4.1 Room Size

All of the proposed shared accommodation private living spaces are **single occupancy** and the applicable minimum bedroom size in accordance with Table 5A of the Design Standards for New Apartments (DsFNA) is 12 sq.m. This proposal is for 240 no. rooms that range from 19 sq.m - 32 sq.m. All rooms thus significantly exceed the minimum standard of 12 sq.m.

Level	Level Total	Type A 25sqm	Type B 22.5sqm	Type C 19sqm	Type D 30sqm	Type E 23sqm	Type F 20sqm	Type Part M (26sqm- 32sqm)
L. 01	62	24	29	0	1	4	2	2
L. 02	62	25	29	0	1	4	2	1
L. 03	58	0	0	52	0	3	2	1
L. 04	58	0	0	52	0	3	2	1
	<b>240</b>	<b>49</b>	<b>58</b>	<b>104</b>	<b>2</b>	<b>14</b>	<b>8</b>	<b>5</b>

**TABLE 10 PROPOSED SHARED ACCOMMODATION - ROOM SIZES**



To ensure adequate provision is made for people with limited access ability 5 no. rooms are Part M compliant and are distributed as follows.

Level	No. of Accessible Units	Room Size (sq.m)
<b>01</b>	2	32
<b>02</b>	1	32
<b>03</b>	1	26
<b>04</b>	1	26

**TABLE 11 PROPOSED SHARED ACCOMMODATION – DISABLED ACCESS PRIVATE LIVING AREAS**

#### 5.4.2 Storage

Specific Planning Policy Requirement 9 (iii) establishes that flexibility shall be applied in relation to the provision of all storage and amenity space on the basis of the provision of alternative, compensatory communal support facilities and amenities. The DSfNA Guidelines state that the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity.

As set out above, the proposed shared living rooms significantly exceed the minimum 12 sq.m and the actual percentage increase for each is set out below.

- Type A 49 no. 25 sq.m – 108% above minimum standard
- Type B 58 no. 22.5 sq.m – 87.5% above minimum standard
- Type C 104 no. 19 sqm – 58% above minimum standard
- Type D 2 no. 30 sq.m – 150% above minimum standard
- Type E 14 no. 23 sq.m – 92% above minimum standard
- Type F 8 no. 20 sq.m – 67% above minimum standard
- Part M 2 no. 26 sq.m – 116% above minimum standard
- Part M 3 no. 32 sq.m – 167% above minimum standard

The generous room sizing means that there is adequate storage space available for future occupants within the private living space. To protect the existing building fabric of the former factory building, cooking facilities are external to the individual rooms i.e., communal kitchens. This design approach means that space within rooms that might otherwise be dedicated to kitchen areas is free.

Waste storage areas are proposed on each accommodation level, external to the individual rooms, this measure further serves to increase the room available within the living space.

Bicycle parking is provided at basement level in PW2.

This proposed development includes 81 no. carparking spaces in the basement of PW2 to facilitate parking for a future residential development proposal in the wider masterplan area and on lands contiguous with SDRA 12. In the alternative, the Applicant would be satisfied to accept a condition requiring that the 81 no. spaces together with the circulation area would be used as storage ancillary to the proposed residential development in the event that planning permission for future residential development is not granted implemented or before the expiration of the subject planning permission. The net area of this additional storage would be 1,293 sq.m.

### 5.4.3 Common Kitchen & Dining Areas

Table 5b of the DsNFA Guidelines establishes the minimum common living and kitchen facilities floor area for shared accommodation schemes.

The stipulated minimum areas are based on a cluster format of shared accommodation as follows;

- Bedrooms 1-3: 8 sq.m per person
- Bedrooms 4-6 Additional 4sq.m per person

Section 5.23 of the Guidelines state that for other shared accommodation, planning authorities should ensure that sufficient communal amenities are provided in accordance with the specified standards in Table 5b.

The proposed shared accommodation is located in the former factory building. Accommodating the private living areas in a cluster type format would undermine the realisation of a public multi-functional space at the ground floor of the building, where the industrial heritage can be enjoyed. This is because more cores would be required, and this would impact the ground floor layout thus conflicting with the design intent.

Therefore, an alternative design approach is applied, whereby each room is a distinct entity laid out along corridors, thus minimising the impact on the building fabric. Accordingly, it is necessary to apply an alternative approach to Table 5b, to establish the minimum common kitchen and dining facilities floor area. The methodology applied is based on each corridor representing a cluster and on this basis 8 sq.m is applied to the first 3 no. rooms on each floor and 4 sq.m to all other rooms on the floor.

This calculation is confined to kitchen and dining areas. In total, 1,036 sq.m is provided and exceeds the minimum standard.

Level	Total No. of Rooms	Rooms 1-3 Minimum Requirement (8 sq.m)	Rooms 4 – 62 Minimum Requirement (4sq.m)	DSfNA Total Minimum Requirement (sq.m)	Proposed Communal Kitchen & Dining Areas (sq.m)
01	62	24	236	260	276
02	62	24	236	260	276
03	58	24	220	244	237
04	58	24	220	244	247
<b>Total</b>				<b>1,008</b>	<b>1,036</b>

TABLE 12 MINIMUM REQUIRED COMMON KITCHEN AND DINING FACILITIES & PROPOSED

#### 5.4.4 Kitchens, Cooking Stations & Dining

On each level there are 2 no. primary combined kitchen and dining areas supported by smaller 'satellite kitchens' also incorporating, see below. The kitchen/dining areas are distributed at convenient locations to limit the travel distance from individual rooms. The maximum travel distance is 21m and each kitchen is thus easily accessible to all proposed private living areas.

Level	Total Bedspaces	MainK/L No. 1 (sq.m)	MainK/L No. 2 (sq.m)	Sat. No. 1 (sq.m)	Sat. No. 2 (sq.m)	Sat.No. 3 (sq.m)	Sat. No. 4 (sq.m)	Total Kitchen (sq.m)	Per Bedspace (sq.m)
01	62	130	65	25	25	31	-	276	4.5
02	62	130	65	25	25	31	-	276	4.5
03	58	130	50	19	19	19	-	237	4.1
04	58	120	50	19	19	19	20	247	4.3

TABLE 13 PROPOSED KITCHEN & DINING AREAS

In terms of cooking stations (i.e., hobs) provided per kitchen, the following is the breakdown. Individual cooking stations will be shared by approx. 5 people and this is comparable to occupancy levels within a 4-bedroom home where there is one kitchen available to serve the household.

Level	Total Bedspaces	MainK/L No. 1	MainK/L No. 2	Sat. No. 1	Sat. No. 2	Sat. No. 3	Sat. No. 4	Total Cooking Stations	Cooking Stations per Bedspace
01	62	4	4	2	2	2	-	14	4.8
02	62	4	4	2	2	2	-	14	4.8
03	58	4	3	2	2	2	-	13	4.5
04	58	2	3	2	2	2	2	13	4.5

TABLE 14 PROPOSED COOKING STATIONS

The following is the breakdown of dining areas available within each kitchen. 174 no. spaces are provided i.e., 73% of occupants can dine at any one time. This is considered reasonable as dining patterns vary.

Level	Total Bedspaces	MainK/L No. 1	MainK/L No. 2	Sat. No. 1	Sat. No. 2	Sat. No. 3	Sat. No. 4	Total Dining
01	62	18	16	6	6	6	-	52
02	62	18	16	6	6	6	-	52
03	58	18	10	6	6	6	-	46
04	58	8	10	6	6	6	6	24

TABLE 15 PROPOSED DINING SPACES WITHIN EACH KITCHEN/DINING AREA

#### 5.4.5 Communal Services, Amenities and Facilities

The provision of communal services, amenities and facilities is recognised as an important element of the Shared Accommodation model. The DSfNA (SPPR 7(b)) provides the following guidance for what constitutes facilities as distinct from services and amenities.

- i. Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.
- ii. Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.

#### **Dedicated Shared Accommodation Services & Amenities and Facilities**

As outlined above there is 1,036 sq.m of kitchen/dining space proposed, and this equates to **4.3 sq.m** per shared accommodation resident.

Additional dedicated shared accommodation, facilities, services and amenities are proposed (2,138sq.m) as outlined in the Table below and equate to **3 sq.m** per resident.

<b>Services &amp; Amenities</b>	<b>PW 1 L03</b>	<b>PW1 L04</b>
<b>Entertainment Area (Kitchen / Dining / Party)</b>	54 sq.m	
<b>Terrace/Lounge</b>	43 sq.m	-
<b>Lounges</b>	132 sq.m	-
<b>Entertainment (Games Room)</b>	48 sq.m	-
<b>External Terrace</b>	300 sq.m	150 sq.m
<b>Total</b>	<b>727 sq.m</b>	
<b>Total per Shared Living Resident</b>	<b>3 sq.m</b>	

**TABLE 16 DEDICATED SHARED ACCOMMODATION SERVICES & AMENITIES (EXCLUDING KITCHEN & DINING AREAS)**

108 sq.m of dedicated shared accommodation facilities are proposed, this is **0.45 sq.m** per resident.

<b>Services &amp; Amenities</b>	<b>PW 1 L01</b>	<b>PW 1 L02</b>	<b>PW 1 L03</b>	<b>PW 1 L04</b>
<b>Laundry</b>	10 sq.m	10 sq.m	8 sq.m	8 sq.m
<b>Welfare Facilities</b>	5 sq.m	5 sq.m	5 sq.m	5 sq.m
<b>Bin Storage</b>	13 sq.m	13 sq.m	13 sq.m	13 sq.m
<b>Total</b>	<b>108 sq.m</b>			
<b>Total per Shared Living Resident</b>	<b>0.45 sq.m</b>			

**TABLE 17 DEDICATED SHARED ACCOMMODATION FACILITIES**

Combined, the proposed dedicated shared accommodation services, amenities and facilities, provide for **7.75 sq.m** per occupant of the shared living accommodation. This is considered to be an excellent provision and exceeds the provision in shared accommodation schemes recently permitted by An Bord Pleanála e.g., PL29S.307217 for a mixed use part shared accommodation development incorporating 69 no. private living areas with 426 sq.m of tenant amenities and facilities, equating to 6.2 sq.m per occupant.

## Common Amenities & Facilities for Shared Accommodation & Build to Rent Apartments

The proposed shared accommodation is part of a wider residential proposal that includes BtR apartments. To encourage an integrated new neighbourhood and owing to the exceptional industrial heritage quality of the factory building, additional shared amenities and services and facilities (combined 2,261 sq.m) are concentrated in building PW1 and PW2 and these will be accessible to all future residents.

Services & Amenities	PW1 L. 01 (sq.m)	PW1 L.02 (sq.m)	PW 1 L.07(sq.m)	PW2 L.00 (sq.m)	PW2 L.06 (sq.m)	PW2 L.17 (sq.m)
Entertainment (Kitchen/Party Room)	164					
TV Room	37					
Entertainment (Games Room)	46					
Library	77					
Meeting Room	39					
Business Centre	53					
Access/Circulation	194				57	
Gym/Store		650				
Amenity Lounge			43	159		73
Co-working				221		
<b>Total</b>	<b>1,813 sq.m</b>					
<b>Total per Bedspace</b>	<b>1.1 sq.m</b>					

**TABLE 18 PROPOSED SERVICES & AMENITIES FOR WIDER DEVELOPMENT**

The proposed development includes a total of 1,639 bed spaces and so the additional amenities and services to be shared across the scheme in PW1 will provide occupants of the shared living element with an additional 1.1 sq.m.

The scheme includes 285 sq.m of facilities at ground floor in building PW1 that may be shared with residents occupying the shared accommodation element. The total bedspaces in PW1 is 362 no. residents of the shared accommodation offering will thus have access to a further 0.8 sq.m of facilities.

Combined, residents of the shared accommodation element of this proposal will benefit from an additional **1.9 sq.m** of services, amenities and facilities.

### 5.4.6 Overall Provision

Combined, the proposed scheme provides 7.75 sq.m of dedicated services, amenities and facilities per resident of the shared accommodation proposal. There is a diversity of uses and the floor space is appropriately distributed to support easy access from private living spaces.

As the shared accommodation forms part of a wider built to let proposal, the residents of the shared living will benefit from access to wider amenities and facilities that are proposed. The cumulative (dedicated and shared with BtR apartments) provision for each resident of the shared accommodation is 9.65 sq.m per bedspace.

## 5.5 Build to Rent Apartments – Amenities, Services & Facilities

It is specific planning policy (SPPR 7(b)) for BtR schemes to incorporate resident support facilities and services and amenities.

The 2018 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities do not stipulate quantities of each that must be provided.

The proposed development will provide high quality amenities and support facilities for the 492 no. apartments proposed in this application. In the absence of minimum published standards, a review of other BtR permitted BtR schemes has been undertaken. It is noted that the number of bedspaces in a scheme is not readily available in the published information on the An Bord Pleanála website, and so, our analysis is confined to sq.m per unit. It is further noted that for some permitted schemes, the quantity of amenities and facilities is grouped in the reports.

Across the permitted schemes there is a wide range (1.7 sq.m per<sup>1</sup> unit to 10 sq.m<sup>2</sup> per unit) in the amount of tenant amenities and facilities provided. The lowest is for a development permitted in 2019 at Cookstown Industrial Estate, Tallaght and the highest relates to a combined student accommodation and BtR development in Dublin 8. It provides 10 sq.m per unit, however, it should be noted that the scheme is predominantly a student accommodation scheme with just 37 no. BtR apartments.

The average amenity provision nationally is approx. 4 sq.m per unit. For permitted schemes within the Dublin City jurisdiction, the average is 3.7 sq.m per unit.

In total, there is 1,813 sq.m (excluding provision dedicated to shared accommodation) of tenant services and amenities within buildings PW1 and PW2, see Table 18.

Separately, 448 sq.m of tenant facilities are proposed, also located in PW1 and PW2.

<b>Facilities</b>	<b>PW1 L. 00 (sq.m)</b>	<b>PW2 L.00 (sq.m)</b>
<b>Reception &amp; Lobby Area</b>	169	
<b>Parcel Room</b>	33	
<b>Lobby Lounge</b>	33	
<b>Lobby Lounge</b>	24	
<b>Administration</b>	26	
<b>Lobby &amp; Post Room</b>		163
<b>Total</b>	<b>448 sq.m</b>	

**TABLE 19 BUILD TO RENT APARTMENTS – FACILITIES**

1 ABP Ref. PL06S.303803, Cookstown Industrial Estate, Tallaght, Dublin 24

2 ABP Ref. PL29S.303436, Mill Street, Sweeney's Terrace and Clarence Mangan Road, Dublin 8.

There are 492 no. apartments proposed with 1,399 no. bedspaces, the following is the allocation per unit and per bedspace.

Type	SQ.M/ Unit	SQ.M/ Bedspace
Services & Amenities	3.7	1.3
Facilities	0.9	0.3
<b>Total</b>	<b>4.6</b>	<b>1.6</b>

**TABLE 20 BUILD TO RENT APARTMENTS - AMENITIES, SERVICES & FACILITIES PER UNIT & BEDSPACE**

This quantity of services and amenities performs very favourably when benchmarked against other permitted schemes, both nationally and within the City Council jurisdiction.

From a qualitative perspective, the proposed development will provide high quality services, amenities and facilities to meet the daily living needs of the future residents. Floor area is allocated for a wide range of uses including; a gym, a library, lounges, co-working space, a meeting room, a business centre, a party room, TV room, concierge, parcel and mail rooms.

The amenities are largely concentrated in PW1 as this is the building that will be the heart of the scheme, the community hub. Within PW1, residents will also have access to floor space dedicated to community, arts and cultural and exhibition space, retail and food and beverage space.

In addition, the development provides extensive outdoor recreational amenity spaces including communal and public open space (see section 5.5) A crèche is also proposed as part of the development

## 5.6 Open Space

A comprehensive private, communal and open space strategy is proposed. This section should be read in conjunction with the **Landscape Design Report & Drawings** prepared by NMP Landscape Architects and included under separate cover.

The landscape scheme is informed by its context both culturally, historically and geographically has been generated to maximise the sense of community, opportunities for interactions and engage with the locality. The perimeter landscape includes the retention of existing boundary walls where possible.

The landscape design strategy is based on 3 principles:

- i Sociability – designing places to encourage social interaction and therefore building a sense of community. This strategy is employed both in the design of the public open spaces (Players Park and St. Catherine’s Park), and communal areas, courtyards and terraces.
- ii Play and Playfulness – providing play space and ensuring a playfulness in design to encourage opportunities for imaginative play across all ages and abilities.
- iii Sustainability – Sustainable Drainage and Biodiversity: The design incorporates green roofs and attenuating tree pits.

### 5.6.1 Public Open Space

Throughout the scheme a clear hierarchy of attractive and usable open spaces have been designed to respond to both the active and passive needs of the residents and wider area. These vary in size, scale and programme such as children's play, exercise, open flexible space for residents to gather in all underpinned by the need to promote biodiversity and sustainable practices.

3 no. public parks are proposed, 2 no. are permanent and the third is temporary;

1. Player Park, a multi functional, biodiverse rich park is located to the north west of the former Player Wills factory and is approx. 0.4 hectares;
2. St. Catherine Park, designed as a playground, is adjacent to the existing national school, to the north east of the site, and it incorporates an area of approx. 0.12 hectares; and,
3. An area (approx. 0.12 hectares) adjacent to the school and reserved as part of SDRA 12 for the future expansion of the school will be developed as a temporary park until such time as the expansion secures planning permission under a separate application by the Department of Education.



FIGURE 16 PLAYERS PARK & ST. CATHERINE'S PARK – COMPUTER GENERATED IMAGES

Additionally, the existing courtyard (690 sq.m) in block PW1 (former factory building) will be retained and enhanced and a public plaza (320 sq.m) is proposed between proposed blocks PW and PW4.

The **Daylight, Sunlight & Overshadowing Study** submitted under separate cover demonstrates that the public parks will benefit from excellent sunlight. Players Park would receive 98% sunlight and St. Catherine's Park would receive 88%. These results significantly exceed the BRE threshold for 50% of an area to receive at least 2 hours of sunlight on the 21<sup>st</sup> March, for a space to appear adequately sunlit.

### 5.6.2 Communal Open Space

Residential communal amenity space has been designed to encourage social integration, mitigate against shade and planned to capture as much sunlight as possible.

Communal amenity space is located within residential courtyards and roof terraces with lawns, tree planting, play areas and seating. The distribution is as follows;

- PW1 – 735 sq.m of roof gardens (450sq.m dedicated shared accommodation and 285sq.m for apartments)
- PW2 – 1,223 sq.m courtyard and 1,535 sq.m roof gardens
- PW4 – 111 sq.m courtyard
- PW5 - 167 sq.m courtyard

The sunlight study demonstrates that across the scheme the courtyards and roof terraces together exceed the BRE threshold value, at 71%.



When this is broken down by individual block, PW1 achieves 100% across the rooftop communal amenity area which is dedicated to the shared accommodation residents which has a southerly aspect. The space at roof level dedicated to the proposed apartments achieves 87%. Thus, the communal amenity space provided will provide excellent amenity value for residents.

The courtyard of block PW2 will achieve 52% and thus exceeds the BREs recommendation. The roof level amenity spaces are broken down into 5 no. areas and 3 no. areas significantly exceed the target value ranging from 89% to 98%, 1 no. area meets the 50% standard and 1 no. falls below on the reference date of the 21<sup>st</sup> March. The PW2 roof garden is broken into different spaces and overall excellent sunlight is achieved. Therefore, residents will benefit from a high-quality amenity.

Both PW4 and PW5 exceed the BRE recommended value achieving 63% and 70% respectively.

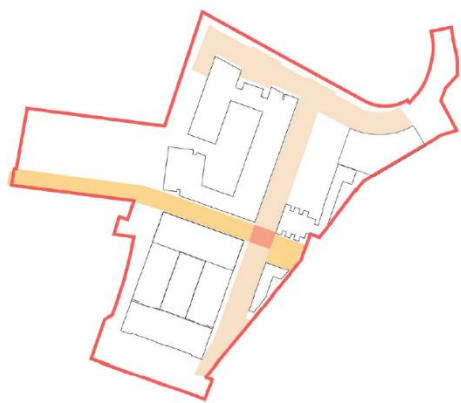


FIGURE 17 COURTYARD CGI

### 5.6.3 Private Open Space

Notwithstanding the flexibility provided in the Design Standards for New Apartments, regarding the provision of private amenity space for Build to Rent proposals, the proposed design includes private amenity space for 98.7% of the proposed BtR units i.e., 486 of the total 492 units.

## 5.7 Streets & Public Realm



The internal street hierarchy includes;

- i. primary streets,
- ii. a shared surface junction and
- iii. a shared surface/home zone<sup>3</sup> with an east-west alignment, connecting the proposed development site with the permitted former Bailey Gibson development to the west.

The width of the internal streets varies between 4.8m (shared surface/home zone) to 5m for two-way roads with 3.7m widths provided on one-way roads to allow access for service and emergency vehicles. Footpath widths have been maximised internally and range between 2m-8m in width. Throughout the scheme, slopes and gradients are designed to be no more than 1:21 slope gradient to ensure slopes are manageable for people who are physically impaired.



**FIGURE 18 HOME ZONE STREET**

<sup>3</sup> A street where people and vehicles share the whole of the road space safely, and on equal terms; and where quality of life takes precedence over ease of traffic movement

High-quality detailing is applied to the South Circular Road public realm, including street trees and shrub planting, generous pavements, cycle parking and seating.



**FIGURE 19 PUBLIC REALM IMPROVEMENTS, SOUTH CIRCULAR ROAD**

The following measures are incorporated into the internal street network;

- Street are designed to encourage lower speeds (30kph or less).
- Vehicular and pedestrian traffic are separated using planting or kerbs appropriately.
- Street furniture is positioned to ensure it does not form an obstruction.
- High quality railings and hedges are used to segregate public & private uses.
- Materials have been chosen to be both robust and timeless, provide texture and tone for visually impaired, to tie into the surrounding public realm while also seeking to provide integrated intuitive wayfinding.
- Street furniture has been selected to adhere to an age friendly seating strategy (backs on seats with arm rests on 50% of benches, all located at intervals for rest stops).

## 5.8 Access & Parking

This section should be read in conjunction with the **Traffic & Transport Assessment** included with this application.

The access strategy for the proposed development has been designed to prioritise sustainable transport modes, while allowing for vehicular access to car parking and for service vehicles. The design provides a safe and permeable environment for residents of the proposed development, with connections through to the wider regeneration lands.

### 5.8.1 Vehicular Access

Access is proposed from Donore Avenue to the north east of the proposed development site, this will be a two-way access. A one-way exit point is proposed to the east of PW1. Both junctions will be priority junctions. A secondary vehicular route is proposed to the south of 'Players Park' and this will provide connectivity to the Bailey Gibson development to the west.

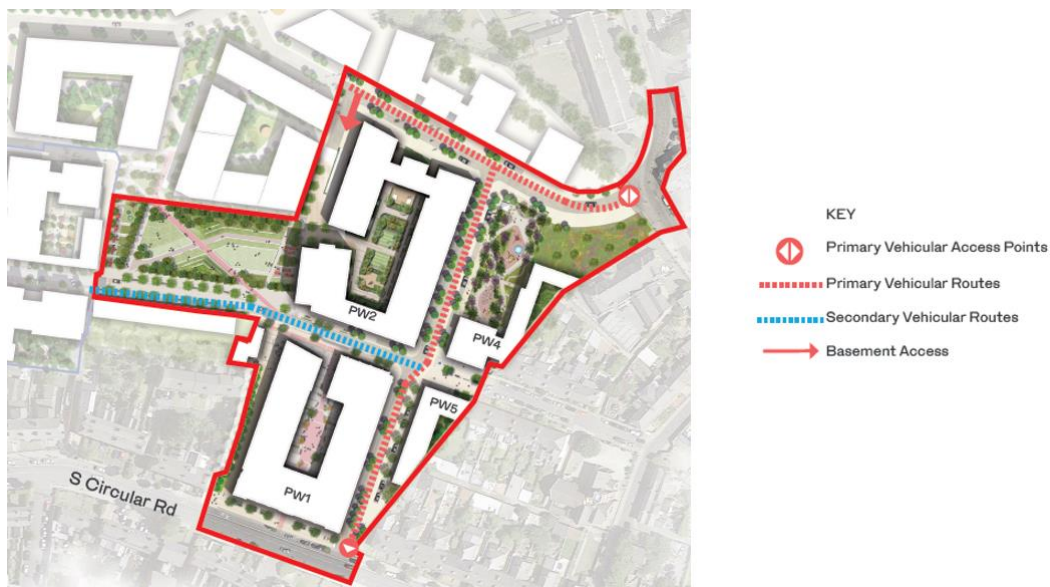
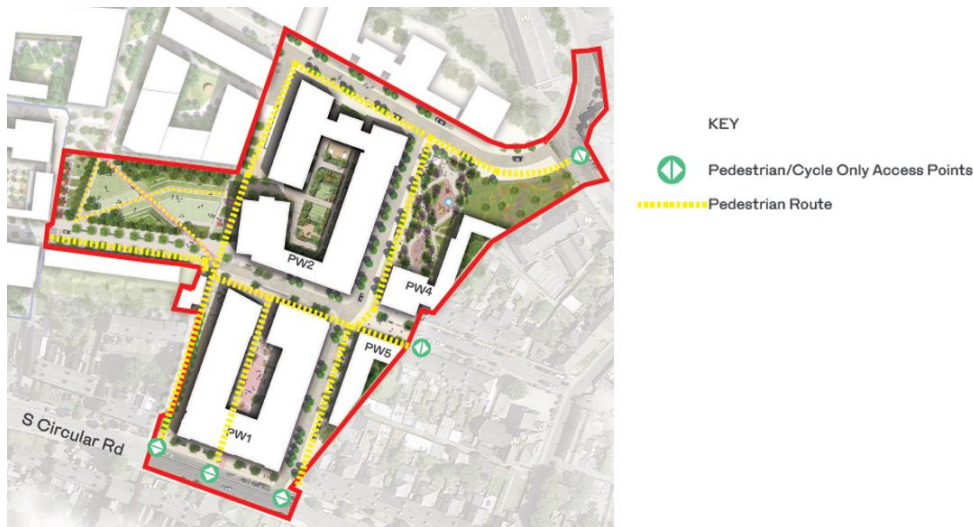


FIGURE 20 PROPOSED VEHICULAR ACCESS

### 5.8.2 Pedestrian & Cyclist Access

4 no. pedestrian access points are proposed to promote the principle of permeability, 2 no. from South Circular Road, 1 no. from St. Catherine's Avenue and 1 no. from Donore Avenue. It will also be possible to access the scheme on-foot through the entrance to PW1 on SCR, which would route users through the courtyard and beyond to the wider development.



**FIGURE 21 PROPOSED PEDESTRIAN/CYCLISTS ACCESS**

### 5.8.3 Car Parking

Parking will be largely contained within a double basement underlying building PW2. The basement will accommodate 249 no. parking spaces, of these, 168 no. are reserved for this proposed development, with 148 no. dedicated to parking for the proposed apartment dwellings (including 19 no. disabled spaces) and 20 no. reserved for a car sharing club e.g. Go Car. 6 no. motorcycle spaces. 10% of parking spaces will be fitted with electric charging points.

The balance, 81 no. car parking spaces, are included in the basement of PW2 to serve a future residential development on lands within the wider masterplan area and contiguous with it. 5 no. spaces are reserved for disabled parking and 10% of these spaces will be fitted with electric vehicle charging. The net floor area allocated to this parking together with the circulation area is 1,293 sq.m. As outlined in section 5.3, these spaces will not be set out or used in the absence of a separate grant of planning permission for future residential development.

To provide for a high-quality public realm, car parking at surface level is minimised and 37 no. spaces are proposed including 3 no. disabled access spaces and 3 no. set down spaces for the proposed creche. 10% of the parking spaces will be fitted with electric vehicle charging points.



**FIGURE 22 DISTRIBUTION OF SURFACE PARKING**

### 5.8.4 Service Vehicles

2 no. loading bays are proposed at surface level, 1 no. to the southeast and 1 no. the north of building PW1. There are 3 no. taxi drop-off points, and all are within the internal street network. Dedicated waste collection points are proposed adjacent to each of the proposed buildings.

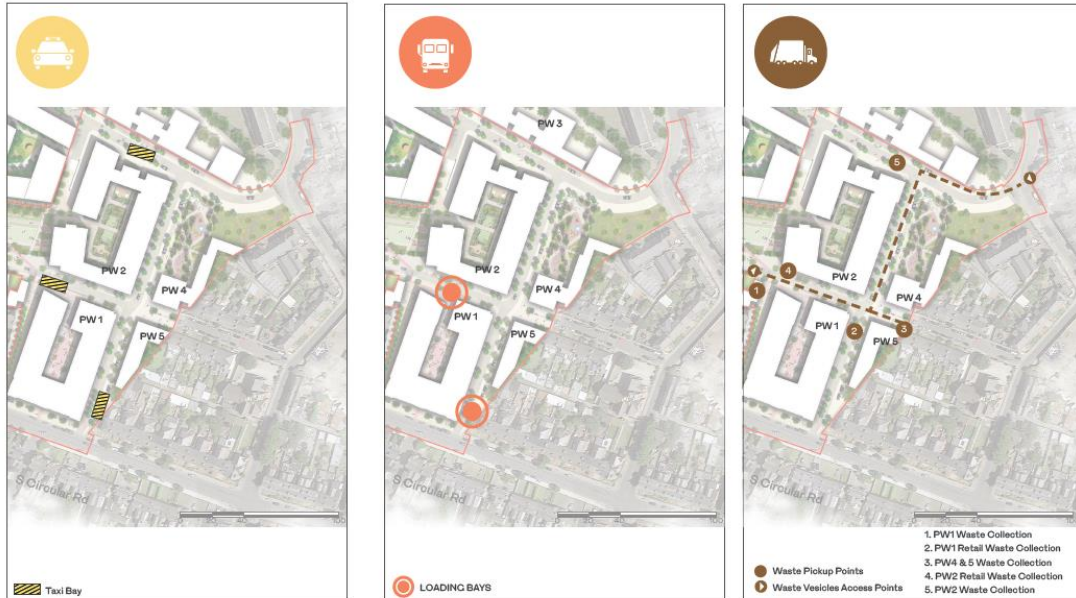


FIGURE 23 SERVICE VEHICLE ARRANGEMENTS

### 5.8.5 Cycle Parking

903 no. long-stay bicycle parking spaces are proposed, with 861 no. spaces in the PW2 basement and 42 no. at surface level in secure enclosures within blocks PW4 and PW5. 20 no. spaces are reserved for non-residential uses and 110 no. short-stay visitor bicycle spaces provided at ground level.



FIGURE 24 DISTRIBUTION & TYPE OF SURFACE LEVEL CYCLE PARKING

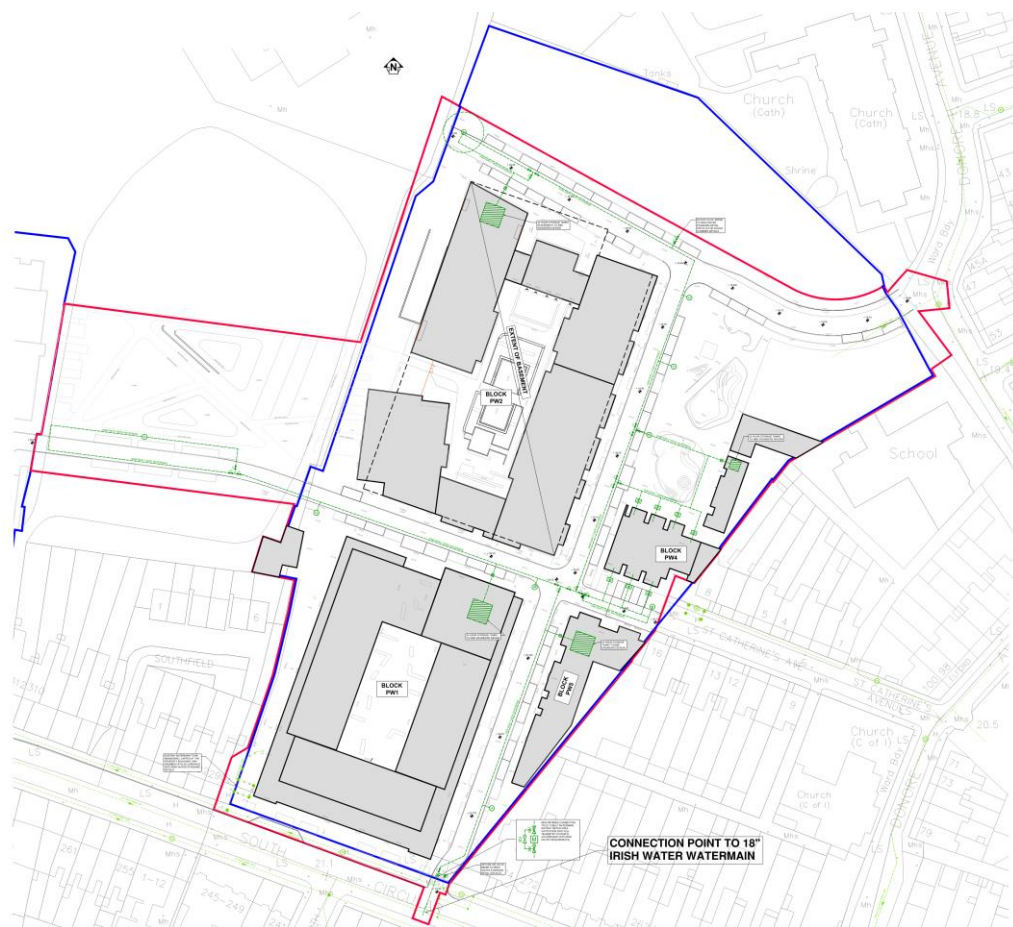
## 5.9 Water Supply & Drainage

An **Infrastructure Design Report** accompanies this application and should be referenced for a comprehensive description of the proposed surface water, foul water and water supply strategies.

### 5.9.1 Water Supply

A new 200mm diameter looped watermain is proposed to service the proposed development with a connection to the 18-inch cast iron watermain in the South Circular Road. Water demand for the proposed development is as follows; Average – 3.738l/s. Peak – 18.96l/s.

Hydrants will be provided on the loop main in accordance with Part B of the Building Regulations and the Fire Safety Certificate's Requirements. Sluice valves will be provided at appropriate locations to facilitate isolation and purging of the system. Twenty-four-hour storage will be provided to cater for possible shutdowns in the system.



**FIGURE 25 PROPOSED WATER SUPPLY**

### 5.9.2 Foul Drainage

Foul water will discharge to the combined sewer within Donore Avenue at the north east corner of the proposed development site, and this is confirmed as acceptable by Irish Water. Foul wastewater discharge from the development will be as follows; Average – 3.337l/s. Peak – 10.524l/s.



**FIGURE 26 PROPOSED FOUL DRAINAGE LAYOUT**

### 5.9.3 Surface Water Drainage

Sustainable Drainage Systems (SuDS) measures are incorporated into the surface water management system. These include both intensive and extensive green roofs, interconnected tree pits, attenuation storage and petrol interceptors.

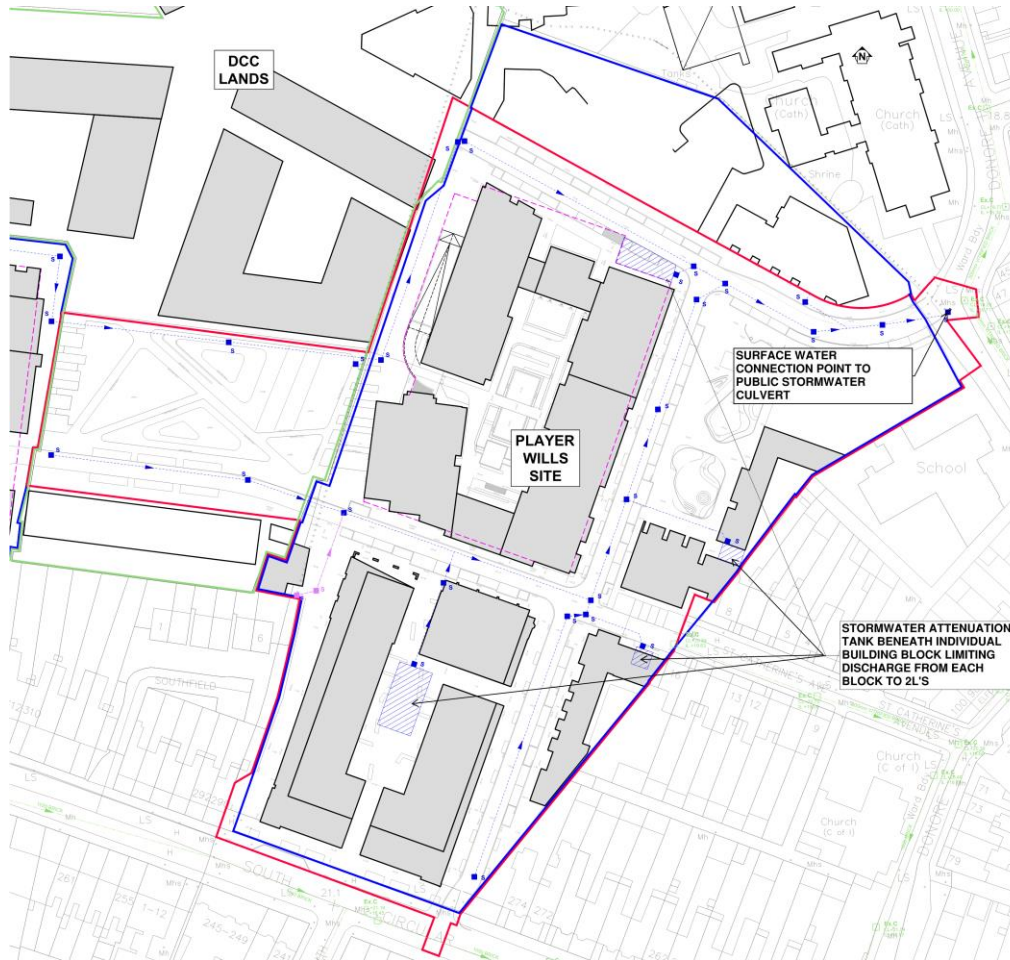
Each building will incorporate green roofs throughout and all hard landscaping at grade within the private space of each block shall be discharged to tree pits or filter strips with overflows which shall finally discharge to an attenuation tank within the individual block. The attenuation tank, along with a proprietary flow control device, hydro brake or similar, shall limit discharge from each building to 2l/s/ha subject to a 2l/s minimum rate due to practical minimum discharge limits. The outfall drain from each block shall connect to the new stormwater drainage network within the street.

In accordance with DCC policy for roads to be taken in charge, the road drainage has been designed to cater for the 5 Year ARI storm event including a 20% allowance for climate change with no attenuation of stormwater discharge from these areas.

Both the proposed 'Players Park' and 'St. Catherine's Park' will have a significant area of soft landscaping throughout. Hard paved surfaces forming footpaths through the parks will all drain to filter strips located along the verge/kerb line of each footpath. From here, the stormwater will filter into the permeable hardcore build-up beneath the full area of the paved surface above. Essentially, this shall ensure that all stormwater in both parks shall be capable of discharging to ground over the full surface area of the park.



Due to the poor permeability of the boulder clays which are present at this site, and to ensure the ongoing functionality of the parks in high intensity storm events, the filter strips will incorporate a land drain which will have an overflow connection to the main surface water network.



**FIGURE 27 PROPOSED SURFACE WATER DRAINAGE**

To facilitate a connection to the potable water supply, it is proposed to connect to the existing public watermain within the South Circular Road. Water demand for the proposed development is as follows; Average – 3.738/s. Peak – 18.96l/s.

## 5.10 Waste Management

An **Operational Waste Management Plan** prepared by Byrne Consulting accompanies this application under separate cover.

A site wide waste storage and management strategy has been developed for the both the commercial and residential uses. Waste storage areas allow for the segregation of waste.

There are 6 no. waste storage areas dedicated to residential use in the basement of PW2 and a bin store, east of PW1. All bulk waste bins shall be brought from the communal bin storage areas to the designated bin collection areas, see Figure 24, located within the development, at street level by the Facilities Management Company.

Waste generated by the non-residential uses (retail, food & beverage, creche etc.) shall be separately managed by the operators who shall engage a commercial waste contractor to collect waste generated.

## 5.11 Services

### 5.11.1 Electricity

A new underground cable shall connect into the existing network and route through the proposed development to serve the proposed new ESB sub-stations; 1 no. single sub station in PW 1 (43.5 sq.m) and 1 no. double sub station in PW2 (68 sq.m).

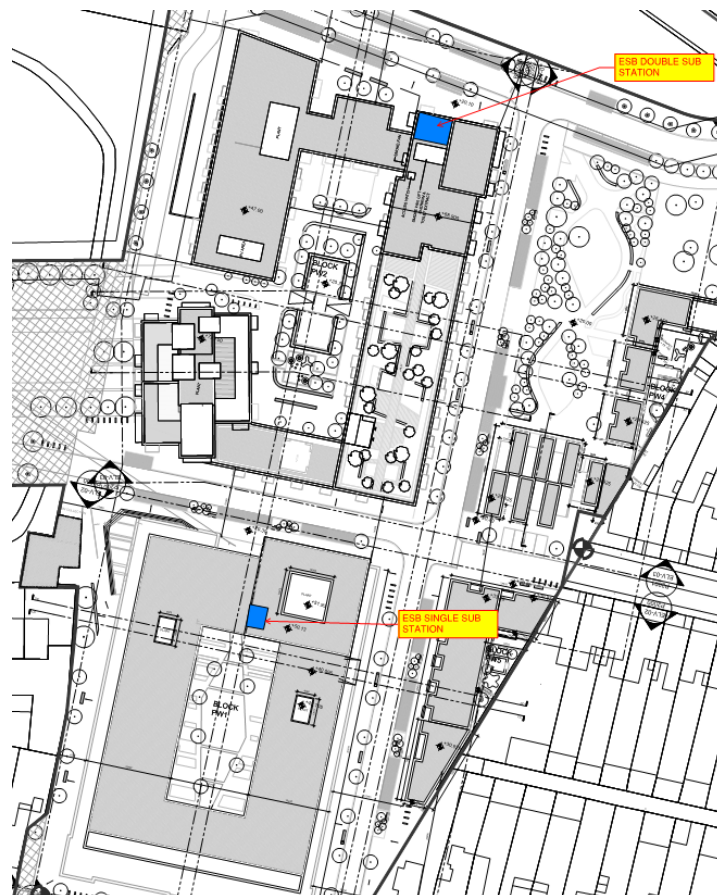
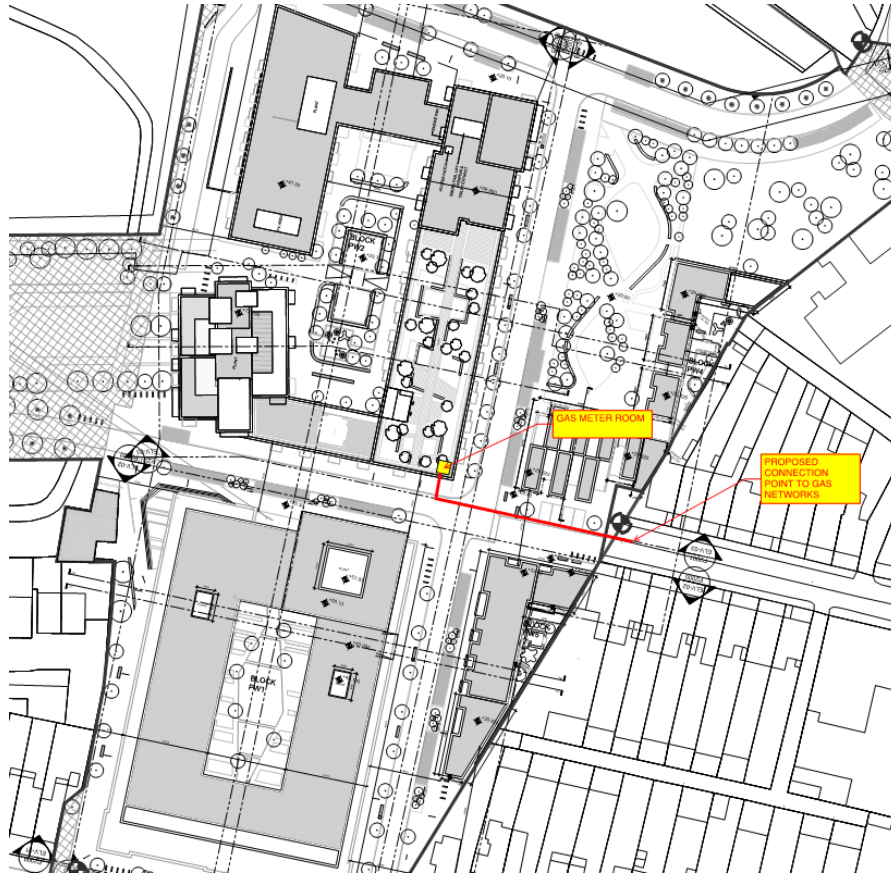


FIGURE 28 LOCATION OF ESB SUBSTATIONS

### 5.11.2 Gas Supply

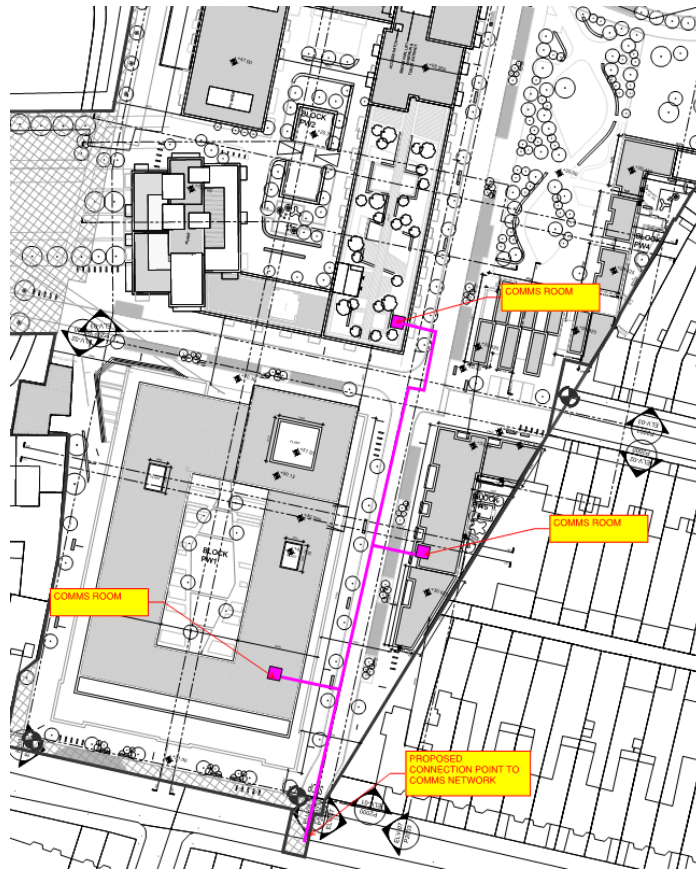
The supply of gas to the proposed development will be provided by way of a metered connection to the main plant rooms from the existing Gas Networks Irelands national gas supply network at St. Catherine's Avenue.



**FIGURE 29 PROPOSED GAS INFRASTRUCTURE**

### 5.11.3 Telecommunications

The supply of telecoms infrastructure to the proposed development will be provided by way of a connection to a telecoms control room from the existing telecommunication networks.



**FIGURE 30 PROPOSED TELECOMMUNICATIONS INFRASTRUCTURE**

### 5.12 Energy

An **Energy & Sustainability Report** accompanies this application under separate cover. A Building Energy Rating (BER) of A2/A3 has been targeted throughout the proposed development. The proposed development will comply with Part L 2019 nearly zero energy building (NZEB) for the residential element and Part L 2017 NZEB for non-residential elements. Additionally, the proposed design is compliant with Part F (Ventilation) of the Building Regulations.

The approach to energy design requires the design to focus on an energy demand reduction. This will primarily be achieved through passive strategies such as an energy efficient envelope which in turn reduces the demand relating to items such as heating, ventilation and air conditioning (HVAC) and renewable energy systems. This initial approach in reducing the energy demand significantly aids the project in obtaining the desired energy goals while reducing running costs.

The key steps in the Energy Hierarchy Plan are outlined as follows:

- i. The key philosophy of this plan is to first reduce energy demand by improving the building's thermal envelope, increasing air tightness, improving thermal transmittance and applying passive design techniques.
- ii. The second step is to utilise energy in the most efficient way through the selection and installation of energy efficient plant and equipment.
- iii. The final step is to introduce energy from renewable sources to reduce the burden on fossil fuels.

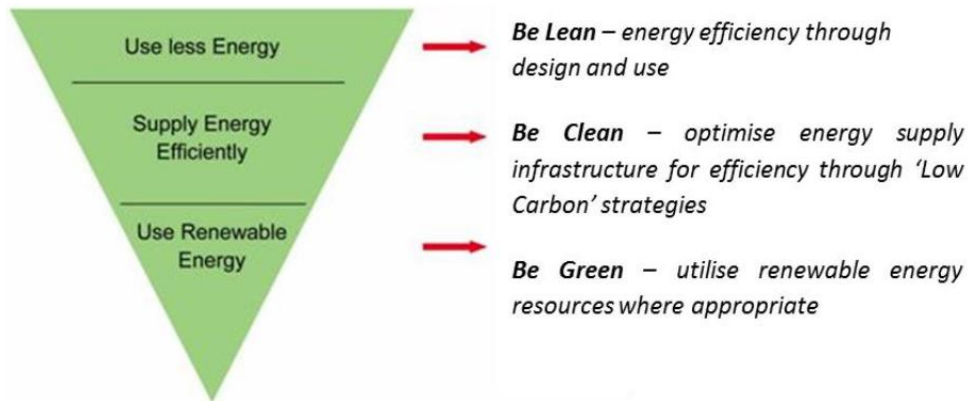


FIGURE 31 ENERGY HIERARCHY

To improve the overall energy efficiency of the residential component of the proposed development, plant is to be selected based on performance and energy efficiency.

- **Space Heating:** Electric Panel Heaters
- **Domestic Hot Water:** Air Source Heat Pumps (ASHP)
- **Ventilation:** Mechanical Ventilation and Heat Recovery

Within the non-residential elements, the following strategy will apply;

- **Space Heating:** ASHP
- **Hot Water:** ASHP
- **Space Cooling:** Natural ventilation where possible, and/or ASHP
- **Ventilation:** Natural ventilation where possible and/or mechanical ventilation. The mechanical ventilation system will be a high efficiency, variable speed drive system that also incorporates heat recovery and CO<sub>2</sub> control.

The following renewable energy technologies are being considered;

- i. Air Source Heat Pump
- ii. Solar Photovoltaics
- iii. Variable Refrigerant Flow Heat Pumps

The Energy & Sustainability Report confirms that if the energy and sustainability strategy is successfully implemented, the proposed development will satisfy all Part L and BER requirements.

## 5.13 Public Health

A report has been prepared by a public health specialist and is included in Appendix 4.1 (Volume III) of the EIAR.

The specialist was provided with the plans and particulars of the proposed development and carried out an assessment to determine the risk of infection and exposure to COVID19 within the following domains:

- Pandemic Planning & Design considerations
- Barrier measures
- Environment control
- Living Space organisation (in context to local conditions, technical advice on shared accommodation in a safe and optimal environment)

The report states that given current understanding of the transition and infection patterns of COVID19, the main routes to infection include,

- a) large droplet transmission,
- b) surface contact and
- c) airborne transmission

The design, ventilation and drainage systems were given due consideration. The independent assessment determines that the planned layout will have the necessary control measures in place such as environmental controls pertinent to adequate ventilation, social distancing, spacing requirements, sewage and drainage etc. that allow for the risk to be qualified as low.

The report identifies that Health and Safety was a primary driver in the ventilation strategies, such as the utilisation of full extract with no circulation (kitchen hoods for example) as well as operable windows. The primary design principal is based on a year-round, continuous ventilation system with 100% extract and 100% fresh air supply with no ventilation. This is in line with the World Health Organisation and the European Centre for Disease Control guidelines on appropriate building engineering controls which include sufficient and effective ventilation, possibly enhanced by particle filtration and air disinfection, avoiding air recirculation and avoiding overcrowding as well as maintaining continuous ventilation. A further example provided within the planning and design includes the usage of local heat recovery ventilation system which provides fresh and extract air to the space within amenity areas, cafes and bars.

The shared kitchen facilities, although likely to be only intermittently used, are not considered to increase the risk of transmission given all the controls that are in place. Common areas will need strict adherence to social distancing and the other control measures proposed in this document if required but are considered no higher risk than similar facilities that may be used outside of the building. The self-contained nature of the accommodation dramatically reduces the risk of transmission of the virus.

The risk assessment determined that the risk of transmission between individuals within the proposed development is low.

## 5.14 Construction Phasing

Subject to securing a positive planning decision, the preliminary construction programme is 42 months and 2 weeks. The project commencement date is estimated to be the 4th May 2021 with a completion date of 3<sup>rd</sup> December 2024. The duration of the procurement process will influence the commencement and completion dates and therefore these dates are indicative.

A **Construction Environmental Management Plan** (CEMP) is included under separate cover and provides comprehensive detail for this aspect of the proposed development. The proposed **Phasing Plan** is appended to the CEMP.

The proposed development will be delivered across 5 no. phases as outlined in the Table below.

Construction Phase	Description of Works	Approximate Duration	Estimated Completion Date
1	Structural Demolition	≈ 3 months	04 Aug 2021
	Site Setup	≈ 7 months	03 Dec 2021
	Lay Drainage for Initial Road N&E of PW1	≈ 1.5 months	24 Jun 2021
	Construct Road East of PW1 only	≈ 2 months	25 Aug 2021
	Lay Drainage in Players Park	≈ 1.5 months	21 Jul 2021
	Lay main Drainage Remainder	≈ 1.5 months	23 Aug 2021
	Construct Attenuation Tank	≈ 1.5 months	12 Aug 2021
2	PW2: Basement Works	≈ 36 months	18 Jul 2023
3	PW1: Ground + 8 Storeys + Roof	≈ 27 months	04 Mar 2024
4	PW2: Ground + 18 Storeys + Roof	≈ 30 months	12 Jul 2024
5	Players Park	≈ 9.5 months	12 Jul 2024
	PW4: Ground + 3 Storeys + Roof (Inclusive of Creche & St. Catherine's Park)	≈ 16.5 months	12 Nov 2024
	PW5: Ground + 3 Storeys + Roof	≈ 16 months	03 Dec 2024

**TABLE 21 PHASING & DURATION**

## 6 Planning Policy Context

This application is accompanied by a **Statement of Consistency** addressing the compliance of the proposed development with the relevant national and regional planning policies, including Section 28 Ministerial Guidelines.

Compliance with the Dublin City Development Plan 2016-2022 is set out in this report. It is noted that since the adoption of the DCDP, there has been significant change to planning policy in national and regional plans. Specific Planning Policy Requirements contained in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) and the Urban Development and Building Heights Guidelines for Planning Authorities (2018) supersede development management criteria in the DCDP.

### 6.1 National Planning Framework

This application has been prepared against the backdrop of Project Ireland 2040 and the National Planning Framework (NPF) 2018. The NPF sets the targets and development strategy to cater for the estimated one million extra people that will be living in Ireland and the further two thirds of a million people who will be working in Ireland by 2040. Over the life of the plan, it is forecast that half a million additional homes will be needed to accommodate this projected growth.

The NPF's long-term vision aims to balance the provision of good quality housing that meets the needs of a diverse population by developing our cities, towns and villages as attractive places to live both now and in the future. The plan embraces the principle of compact growth, promoting development that is within the existing built-up footprint of settlements or contiguous to existing developed lands. The target is for at least 50% of all new housing to be delivered within the existing built-up areas of cities on infill and/or brownfield sites. These include vacant and under-occupied buildings, with high housing and job densities, better serviced by existing facilities and public transport.

In addition, Rebuilding Ireland was introduced in 2016 to respond to a significant shortage of housing in the country and so accelerate housing supply nationally. The plan aims to address the needs of homeless people and families in emergency accommodation, increase the provision of social housing, deliver more general needs housing by encouraging new construction, utilise vacant homes and improve the rental sector.

In conjunction with a suite of measures to address homelessness and improve government supports for households in need, Rebuilding Ireland seeks to increase the overall supply of new homes to 25,000 per annum by 2020. *Pillar 4* of Rebuilding Ireland aims to “*Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents*”.

This proposed development will assist with achieving the following objectives of the NPF;

- Objective 3a - 40% of new homes would be within the existing built up areas of settlements, while
- objective 3b - 50% of new homes in cities would be within their existing footprints as defined in the census.
- Objective 10a and Table 4.1 set a minimum population target for Dublin of 1,408,000 in 2040 compared to the figure of 1,173,000 recorded in 2016.
- Objective 11 favours development that can encourage more people to live or work in existing settlements.
- Objective 13 is that in urban areas, planning and related standards including those on building height and car parking will be based on performance criteria.



- Objective 35 is to increase residential density in settlements by various means including infill development.

## 6.2 Eastern and Midlands Regional Spatial and Economic Strategy

Objective RPO 4.3 of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regions 2019-31 supports the consolidation and intensification of brownfield sites in Dublin.

The RSES anticipates that Dublin City and Suburbs will experience population growth of 220,000 over the period 2019-2031, with 50% of all housing to be provided within or contiguous to the existing built-up area.

In line with the requirements of the NPF, a Metropolitan Areas Strategic Plan (MASP) was prepared for Dublin, underpinned by the vision to:

*“build on our strengths to become a smart, climate resilient and global city region, expanding access to social and economic opportunities and improved housing choice, travel options and quality of life for people who live, work, study in or visit the metropolitan area strengthen the metropolitan area as a smart, climate resilient and global city region.”*

This high-level vision includes a spatial framework that supports the Settlement Strategy of the RSES and provides an integrated approach to land-use and transportation for the sequential development of the metropolitan area. The MASP identifies Growth Enablers, including:

*“To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.”*

The proposed development has been carefully designed to ensure delivery of strategic outcomes through an extensive master-planning process, including compact development; placemaking, accessibility to high quality public transport, employment creation and to support a reduced carbon footprint.

## 6.3 Guidelines for Planning Authorities on Sustainable Residential Development

The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas were issued under section 28 of the Planning and Development Act 2000, as amended, in May 2009. Section 1.9 recites general principles of sustainable development and residential design, including the need to prioritise walking, cycling and public transport over the use of cars, and to provide residents with quality of life in terms of amenity, safety and convenience. Section 5.6 states that there is no upper limit on the number of dwellings that could be provided in town centres subject to other normal planning criteria. Section 5.8 states that densities of less than 50 dph on public transport corridors should be discouraged. A design manual accompanies the guidelines which lays out 12 principles for urban residential design.

## 6.4 Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments

The Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments were issued in March 2018. Section 2.4 states that central and accessible urban locations, including those within walking distance of a railway station, are generally suitable for development at higher densities which is wholly composed of apartments. The minimum floor area for one-bedroom apartments is 45m<sup>2</sup>, for two-bedroom apartments it is 73m<sup>2</sup> and for three-bedrooms it is 90m<sup>2</sup>. Requirements for individual rooms, for storage and for private amenities space are set out in the appendix to the plan.

**SPPR 4** sets quantitative standards for dual aspect apartments, relevant to this proposed development is that (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

**SPPR 5** requires ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.

**SPPR 6** A maximum of 12 apartments per floor per core may be provided in apartment schemes.

**SPPR 7 and 8** are specific to Build to Rent proposals;

- **SPPR 7** (a) requires that BtR development must be unambiguously described in the public notices as a 'Build-To-Rent' housing development and must be accompanied by a proposed covenant or legal agreement (b) applications must be accompanied by detailed proposals for supporting communal and recreational amenities. These facilities to be categorised as: (i) Resident Support Facilities and (ii) Resident Services and Amenities.
- **SPPR 8** relates to development management standards and states
  - i. No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;
  - ii. Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;
  - iii. There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;
  - iv. The requirement that the majority of all apartments in a proposed scheme to exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;
  - v. The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.

The guidelines identify the types of location in cities that may be suitable for apartments, having regard to the following broad description of proximity and accessibility considerations:

- 1) **Central and/or Accessible Urban Locations:** *Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:*
  - a. *Sites within walking distance (i.e., up to 15 minutes or 1,000- 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;*
  - b. *Sites within reasonable walking distance (i.e., up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and*

- c. *Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.*

Having regard to the location of the subject site with respect to public transport, the Coombe Hospital and Griffith College, it is concluded that the proposed development satisfies the requirements for a Central/Accessible Urban Location.

## 6.5 Guidelines for Planning Authorities on Urban Development and Building Heights

The Minister issued Guidelines for Planning Authorities on Urban Development and Building Heights in December 2018. **SPPR 1** restates public policy in favour of increased building height and density in locations with good public transport accessibility. Section 2.3 states that higher density does not necessarily require taller buildings, but increased height is a significant component in making optimal use of the capacity of sites in urban locations. Section 3.2 sets out development management criteria at the scale of the city/town, district/neighbourhood/street and the site/building. Where a proposal does not meet the requirements for daylight set out in BS 8206-2 2008 or the BRE guidelines, then compensatory design solutions must be set out. **SPPR 3** provides that a planning authority may grant permission for higher buildings where compliance with the criteria in section 3.2 has been demonstrated even if a development plan would indicate otherwise.

The proposed development seeks to achieve high density development at this urban brownfield site by integrating a sensitive approach to height, concentrated toward the centre of the site, overlooking significant public open space and away from sensitive adjacent land uses. The supporting information included with this application demonstrates that the proposed design achieves the relevant performance based criteria to safeguard existing amenities and provide for a high standard of living for future residents.

## 6.6 Guidelines for Planning Authorities on Childcare Facilities

Section 3.3.1 of the Guidelines for Planning Authorities on Childcare Facilities issued in June 2001 recommends that new housing areas be provided with childcare facilities at a standard of one facility with 20 spaces for every 75 homes.

A **Childcare Demand Report** accompanies this application under separate cover. It conservatively estimates that the childcare demand generated by the proposed development would be 16 no. spaces. A creche capable of accommodating 49 no. pre-school children is proposed. The provision of 49 no. spaces is compliant with the 2001 Childcare Guidelines for Planning Authorities which would require a scheme of this size to deliver a creche capable of accommodating 40 no. places.

Having regard to the capacity and geographical distribution of facilities identified in the catchment area, together with the existing and projected demographic profile, the proposed childcare facility is appropriately sized to cater for the most conservative future forecast needs of the development. The facility is oversized and will thus augment the supply deficit identified in the catchment.

## 6.7 Dublin City Development Plan 2016-2022

### 6.7.1 Zoning

The proposed development site has two land use zonings. The majority of the site has is zoned Objective Z14 - Strategic Development and Regeneration Area (SDRA) 12 St Teresa's Gardens and Environs. The aim of the Z14 Zoning Objective is *'To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and 'Z6' would be the predominant uses.'*

A small portion of the site to the north east is zoned Z1 – Sustainable Residential Neighbourhoods. The aim of the Z1 zoning Objective is *'to protect, provide and improve residential amenities.'*

The Core Strategy estimates that SDRA 12 has the capacity to accommodate between 800-1000 residential units. The overall guiding principles for SDRA 12 are set out below. It is noted that the proposed development site makes up part of the SDRA 12 and so not all of the guiding principles are relevant.

- The development of a network of streets and public spaces will be promoted to ensure the physical, social and economic integration of Saint Theresa's Gardens with the former Player Wills and Bailey Gibson sites, with further integration potential with the sites of the Coombe Hospital white Heather industrial estate.
- A vibrant mixed-use urban quarter would be promoted with complementary strategies across adjoining sites in terms of urban design, interconnections and land use. To provide an area zoned sufficient in size to accommodate a minimum 80 metre by 130 metre playing pitch.
- A new public park is proposed as a landmark feature with passive supervision by residential and other uses; it will have a comprehensive landscaping strategy to provide significant greenery within the scheme and will make provision for a diverse range of recreational and sporting facilities for use by the wider neighbourhood.
- There is potential for one or two mid-rise buildings (up to 50m) within the site, subject to the criteria set out in the standards section of this plan.
- To acknowledge the existing sports lands of St Teresa's Gardens and its environs and act to retain and augment these lands as sporting facilities for the benefit of the wider community and used by local sports clubs.
- At least 20% of the SDRA 12 be retained for public open space, recreation and sporting facilities including an area to facilitate organised games.
- Strong permeability through these lands will be encouraged to generate movement and activity east to west (connecting Dolphin's Barn street and Cork street with Donore Ave) and north to south (connecting Cork St and Donore Ave with the South Circular Road and Grand Canal corridor): a high quality public domain, provision of pedestrian and cyclist routes and provision of active streets will be promoted.
- A community hub will be incorporated into the scheme to provide a wide range of community facilities accessible to the wider neighbourhood; opportunities to highlight the heritage of the local area by proposing community uses close to the important landmark buildings such as St Teresa's Church will be promoted.
- Provision shall be made for the expansion of Saint Catherine's National School, Donore Avenue, in the redevelopment of the former Player Wills site, subject to agreement with the Department of Education and Skills.

The wider SDRA12 lands are also zoned Z14 zoning and lands along South Circular Road to the south of the site are zoned either Z1 – Residential or Z2 Residential Conservation Area.

## 6.7.2 Relevant Chapters & Policy

The Development Plan sets out the spatial framework for the City. Relevant policy statements are;

**SC13:** 'To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city; which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.'

**SC14:** 'To promote a variety of housing and apartment types which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.'

**SC25:** 'To promote development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods, such that they positively contribute to the city's built and natural environments. This relates to the design quality of general development across the city, with the aim of achieving excellence in the ordinary, and which includes the creation of new landmarks and public spaces where appropriate.'

**QH1:** 'To have regard to the DECLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007); 'Delivering Homes Sustaining Communities – Statement on Housing Policy' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2015) and 'Sustainable Residential Development in Urban Areas' and the accompanying Urban Design Manual: A Best Practice Guide (2009)'

**QH3:** '(i) To secure the implementation of the Dublin City Council Housing Strategy` in accordance with the provision of national legislation. In this regard, 10% of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/or affordable housing in order to promote tenure diversity and a socially inclusive city'

**QH5:** 'To promote residential development addressing any shortfall in housing provision through active land management and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites.'

**QH6:** 'To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city'

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

**QH9:** 'To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.'

**QH13:** To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in The Residential Quality Standards and with regard to the Lifetime Homes guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007)'

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

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

**CHC28:** That Dublin City Council is committed to ensuring that there is a supply of workspaces for artists in the city. It is the policy of Dublin City Council to work with all private, public and cultural stakeholders in co-operation to ensure that artistic workspace is a key element in all multiuse developments in the city, in particular ensuring there is provision for cultural and artistic space in developments.

**CHC31:** All large scale, mixed-use development (as defined by this development plan) of office or residential space will include cultural/artistic/community uses.

### **Section 16.10 Standards for Residential Accommodation**

It is an aim of Dublin City Council to encourage and foster living at sustainable urban densities through the creation of attractive mixed-use sustainable neighbourhoods. It is critical that new residential development is sufficiently flexible to allow for changing circumstances (e.g., aging, disability, growing family) and sufficiently spacious with all the necessary facilities to provide a level of residential amenity attractive to families with children on a long term basis

Dublin City Development Plan 2016-2022 relevant policy for **taller buildings** include:

**SC16:** 'To recognise that Dublin City is fundamentally a low-rise city and that the intrinsic quality associated with this feature is protected whilst also recognising the potential and need for taller buildings in a limited number of locations subject to the provisions of a relevant LAP, SDZ or within the designated strategic development regeneration area (SDRA)'.

When assessing open space requirements and landscaping proposals for mixed use developments the relevant policy of the Dublin City Development Plan 2016-2022 includes:

**GI13** 'To ensure that in new residential developments, public open space is provided which is sufficient in quantity and distribution to meet the requirements of the projected population, including play facilities for children'.

**GI14:** 'To promote the development of soft landscaping in public open spaces, where feasible, in accordance with the principles of Sustainable Urban Drainage Systems'.

Policy regarding **Built Heritage and Culture** is set out in Chapter 11, of relevance are;

**CHC1:** To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.

**CHC4:** To protect the special interest and character of all Dublin's Conservation Areas. Development within or affecting a conservation area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

**CHC5:** To protect Protected Structures and preserve the character and the setting of Architectural Conservation Areas. The City Council will resist the total or substantial loss of: - Non-protected structures which are considered to make a positive contribution to the character and appearance of an Architectural Conservation Area, unless it can be demonstrated that the public benefits of the proposals outweigh the case for retention of the building. Demolition behind retained facades may be considered on non-protected structures, depending on the significance of the structures, where it will secure the retention of façades which make a significant contribution to local townscape, where it will maintain the scale of original rooms behind principal façades and where the demolition is considered otherwise acceptable having regard to the above policy considerations.

**CHC24:** To ensure the continued development of Dublin as a culturally vibrant, creative and diverse city with a broad range of cultural activities provided throughout the city, underpinned by quality cultural infrastructure.

**CHC31:** All large scale, mixed-use development (as defined by this development plan) of office or residential space will include cultural/ artistic/community uses.

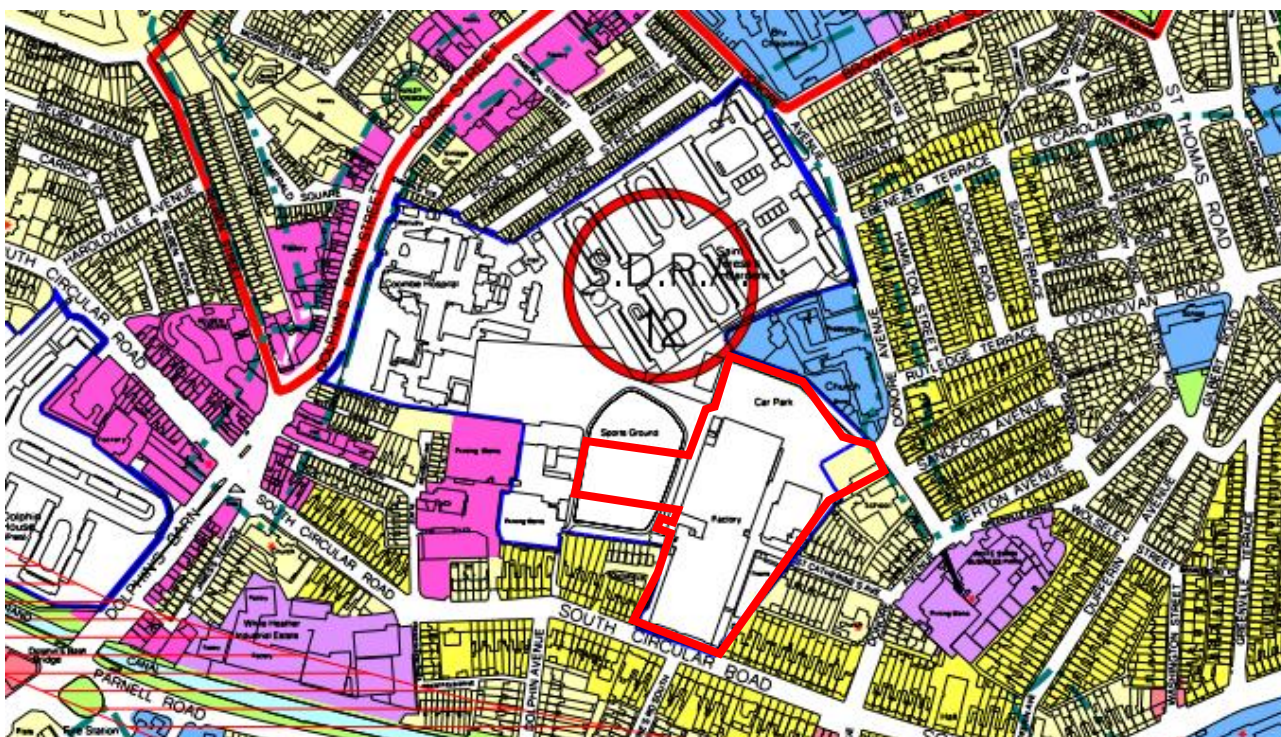
## 7 Planning Assessment

### 7.1 Principle of Development

The proposed development site is predominantly zoned Z14 Strategic Development and Regeneration Area, and the objective is “to seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and ‘Z6’ would be the predominant uses. The purpose of the Z6 zoning is to provide for the creation and protection of enterprise and facilitate opportunities for employment creation.”

A small portion of the subject site to the north-east is zoned ‘Z1’ - Sustainable Residential Neighbourhoods with an objective “to protect, provide and improve residential amenities.” This portion of the land has been set aside for the future expansion of St. Catherine’s National School and will be used as a temporary open space until developed.

**Figure 9** is an extract from Map E of the Dublin City Development Plan 2016-2022 and identifies the SDRA 12 lands (blue outline), Z14 and Z1 zoning of the subject site. All land uses included in this proposed development are permissible in principle.



**FIGURE 32 SITE ZONING WITH SITE OUTLINED IN RED**

The proposed development will contribute to the achievement of the overarching objectives seeking rejuvenation and regeneration of the SDRA 12 lands, as detailed in the Development Framework for St Teresa’s Gardens and Environs (2017), in particular, to:

- Deliver a mixed-use quarter with significant capacity for high quality residential accommodation and complementary uses;
- Promote a mix of tenure and unit types;
- Provide a development that is responsive to its local context and surrounding residential uses;
- Clearly define the public realm through the use and appropriate layout of buildings;
- Promote active street frontages and prioritise pedestrian activity through the quarter;

- Establish a network of streets and public spaces to ensure the social and economic integration of St. Teresa's Gardens with Player Wills and Bailey Gibson sites and surrounding area; and
- Create strong permeability through these lands between Dolphin's Barn and Cork Street and connecting Cork Street and Donore Avenue with South Circular Road and the Grand Canal Corridor, particularly for pedestrians and cyclists.

The proposed development will meet these objectives by creating a vibrant and sustainable new urban neighbourhood which has been carefully designed to integrate with the wider SDRA lands. This scheme ensures a more efficient use of these lands and will significantly contribute to the revitalisation and rejuvenation of the area, fulfilling the purpose of the SDRA 12 and Z1 development objectives.

In close consultation with the City Council, it was agreed that the application site is a location suitable for an intensive mixed-use development where a greater number of retail and community uses could be concentrated for the benefit of the established community and future residents within the overall SDRA 12 Masterplan area.

The type and quantum of uses proposed has not been treated in isolation but has evolved in response to the master-planning exercise and careful consideration of the site's context and site-specific matters. Furthermore, Cork Street to the north-west has been designated as a future commercial and community hub and therefore the integrity of this location for such purposes will take precedence. The accompanying **Social Infrastructure Audit** also indicates that the locality enjoys access to a wide range of commercial, retail, and community facilities.

The successful regeneration of this area shall be reliant upon the delivery of high quality, viable development of sufficient scale to boost the local population and respond to local conditions. The high-density residential nature of the scheme will ensure the ongoing viability of local public transport services and build on the existing population base to support surrounding retail and commercial uses.

Through the creation of a complementary strategy for the development of the SDRA 12 lands, the Applicant has the capacity to deliver a more effective, efficient use of the subject site which is consistent with the overarching aim to regenerate this area. This complementary strategy will enable a more cohesive approach to development of the wider regeneration site that benefits from public realm improvements, enhanced permeability for pedestrians and cyclists and an integrated network of green infrastructure.

It is considered that this proposal for a mixed-use scheme provides a significant opportunity to realise the Development Plan objectives for revitalisation and regeneration in this locality. This proposal to increase residential densities in this central and accessible location is also consistent with current national planning policy, particularly with respect to consolidation and compact growth objectives.



## 7.2 Height

The proposed development site is within Dublin 8, an area that is undergoing significant change as vacant and underutilised land is redeveloped for high density development. This transformation will continue as the wider SDRA 12 lands are redeveloped.

A suite of photomontages are submitted in support of this application and a **Landscape and Visual Impact Assessment** forms part of the EIAR. Critically, the assessment concludes that the impact will range from neutral to major positive and no likely significant negative impacts are predicted.

The Dublin City Development Plan identifies St. Teresa's Gardens & Environs as a location where building heights up to 50m are permitted and the non-statutory Development Framework for St. Teresa's Gardens and Environs (2017) identifies that there is scope for up to 2 no. mid-rise buildings (50m) within the plan area. It continues to state that increased height should be increased as appropriate towards the centre of the land block.

Since the making of the DCDP and the publication of the Development Framework, there have been significant changes at national and regional planning policy that advocate a compact growth approach to urban areas.

The *Urban Development and Building Height Guidelines* (2018) advocate a performance based evaluation of schemes where increased building height is proposed. The supporting information included with this application confirms that the proposed development will;

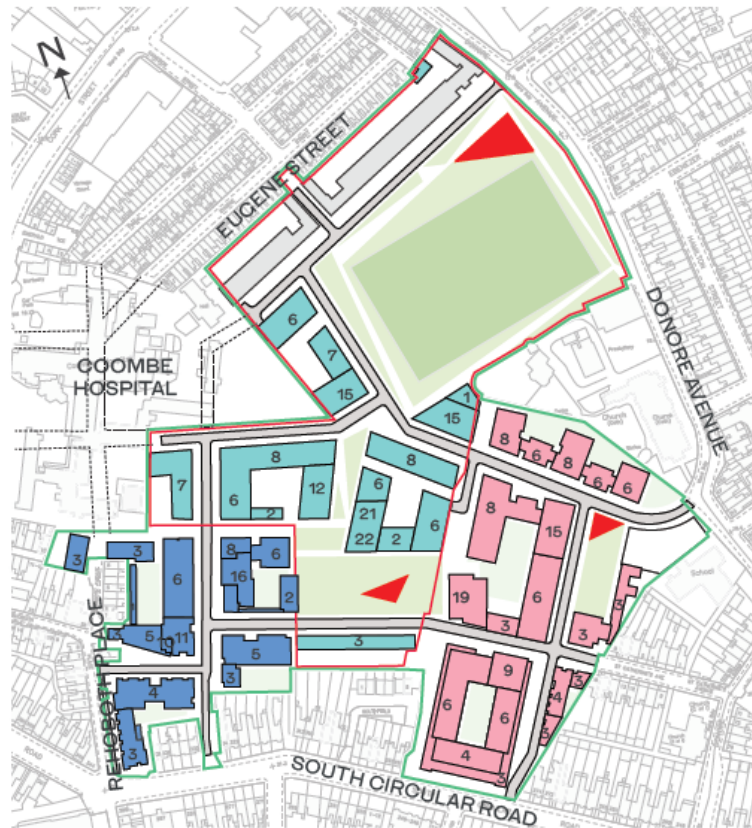
- ✓ Successfully integrate into and enhance the character and the public realm of the area;
- ✓ Make a positive contribution to place making incorporating new streets and public spaces, with a variety of scale and form that responds to the scale of permitted surrounding development;
- ✓ Make a positive contribution to the improvement of legibility through the site and into the wider Masterplan lands; and,
- ✓ Protect the amenity of adjoining land uses and maximises access to natural daylight and sunlight within the proposed units and in public and communal amenity areas.

The proposed massing considers factors such as townscape impact, achieving high levels of daylight and sunlight, minimising overshadowing, whilst making the best use of the opportunity to deliver a scheme which maximises the sites' potential.

The non-statutory Masterplan that accompanies this application under separate cover reviews the height strategy in response to changes that emerged in the Ministerial Guidelines on Building Height published in 2018. The Guidelines post date the City Development Plan and the Development Framework Plan for Teresa's Gardens & Environs.

Key to the Masterplan rationale is developing a sensitive and appropriate scale at the fringes of the SDRA lands allowing the development to integrate with its surrounding residential neighbourhood. Within the Masterplan increased scale is proposed centrally, where it will not materially impact upon neighbouring areas when considered against a range of environmental criteria, such as daylight/ sunlight impact and visual impact. Taller buildings are grouped or cluster centrally to create a cohesive and strongly defined new urban district. A collective considered new skyline is created. Taller buildings are positioned to terminate key vistas or flank public spaces allowing them to create a positive contribution to the urban realm within the Masterplan and from the surrounding neighbourhood.

The Masterplan building height rationale sets out to 'develop sensitively and at an appropriate scale at the interface of the SDRA lands with surrounding existing residential units. Increase the scale of development as appropriate towards the centre of the land block'.



**FIGURE 33 MASTERPLAN BUILDING HEIGHT STRATEGY**

Notably, the former Bailey Gibson site (also within the Masterplan lands) to the west of the proposed development area recently received permission from An Bord Pleanála. This permitted development includes taller elements of up to 16 storeys. In determining the application the Board considered that;

*“the design, while incorporating height greater than that of the surrounding area and heretofore existing pattern and scale of development, the proposed height and higher elements is achieved through a series of buildings of differing heights and scales and those elements of height are designed to be slender and carefully located within the scheme so as to minimise their impact and to act as focal points contributing to the sense of place and way finding within the scheme.”*

The proposed development includes 4 no. blocks (PW1, PW2, PW4 and PW5) ranging in height from 2 to 19 storeys (max height 63.05m above ground level), thus exceeding the DCDP threshold of 50m.

Block	Storeys	Max Building Height to parapet
PW1	5 to 8 storeys	32.53m
PW2	2 to 19 storeys	63.05m
PW4	2 to 3 storeys	10.125m
PW5	4 storeys	13.30m

**TABLE 22 PROPOSED BUILDING HEIGHTS**

Fronting onto South Circular Road, 3 storeys of the original factory building are retained with a 2-storey set back overhead. This configuration of existing 3-storeys + 2 setback is maintained as the building extends northward and an 8-storey projection forms the northeast corner of the building. The scale of PW2 is carefully considered to be respectful of the Z2 Conservation Area and to avoid overbearing visual effects and overshadowing of adjoining properties.

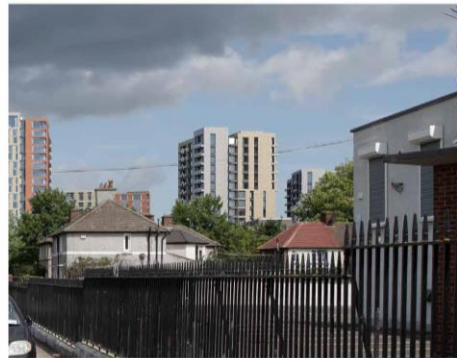
PW 2 is located deep into the site and overlooking the proposed 'Players Park' to the west, with a new internal primary street forming its eastern boundary. It incorporates 2 no. towers including a 19-storey element on the south west corner overlooking 'Players Park' and a 16-storey projection on the north-east corner overlooking the proposed 'St. Catherine's Park'.

Throughout the design process, the architect of building PW2, Kohn Pedersen Fox Associates (KPF), has made significant revisions to the massing, configuration and facade expression of the south west and north east towers to ensure an appropriate townscape response.

Since the preparation of the Masterplan, the design of the 2 no. towers has evolved significantly. This evolution of the slenderness progression is illustrated through the presentation of 2 no. key views, View 3 and View 18, between October 2019 and the current scheme.



October 2019 Scheme View 3



October 2019 Scheme View 18



January 2020 Scheme View 3



January 2020 Scheme View 18



March 2020 Scheme View 3



March 2020 Scheme View 18



Current Scheme View 3



Current Scheme View 18

FIGURE 34 EVOLUTION OF BUILDING PW2

The articulation of the towers in PW2 has been developed to respond to a desire for a slender expression, whilst responding to the fundamental demands of building efficiency and the responsible use of resources. By breaking down the mass of each tower into separate elements, the towers as proposed incorporate an expression of a grouping of taller units, each of which is more-slender than the target 3:1 ratio as illustrated below for both towers.



**FIGURE 35 PROPOSED TOWER 1, NORTH AND EAST ELEVATION AND LAYOUT PLANS SHOWING TOWER SLENDERNESS**



**FIGURE 36 PROPOSED TOWER 2, WEST AND SOUTH ELEVATION AND LAYOUT PLANS SHOWING TOWER SLENDERNESS**

The images included overleaf, illustrate the design refinements to the taller tower since the pre-application consultation meeting with ABP. This progression of the design is a direct response to the discussion that took place on this matter during the pre-application consultation meeting in relation to the townscape, and overall slenderness of the PW2 tower.

As can be seen from the comparison of the March 2020 design and the current proposal, the design enhances the skyline articulation, increases the perception of slenderness and animates the southern elevation to address both aspects. In addition, the current View 3 increases the perception of slenderness and enhances the expression of separate volumes which add visual interest to the building.



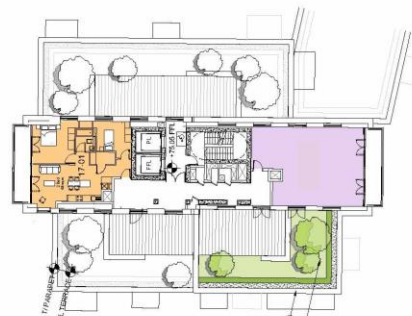
ABP submission March 2020  
Illustrative Axon



Current Scheme  
Illustrative Axon



ABP submission March 2020  
Plan with dormers with duplex 2 bed unit



Current Scheme  
Plan simplified with single storey 2 bed unit

**FIGURE 37 PW2 TOWER DESIGN FOR ABP PAC & CURRENT PROPOSAL**

The image overleaf illustrates the two towers together, where the reading of a cluster of slender elements comprising the overall massing volumes is clearly discernible. The lower of the two towers (in the foreground) has been further articulated in plan (compared with the original masterplan massing) to create a substantial delineation of the separate volumes and further enhancing the verticality of the building.



**FIGURE 38 CGI OF PROPOSED PW2 TOWERS**

Buildings PW4 (2-3 storeys) and PW5 (4 storeys) are lower in scale mindful of their location along the western boundary that interfaces with St. Catherine's Avenue.

PW4 will replace the existing industrial unit and their site position and relationship to the boundary, together with their parapet and ridge height is similar to the existing unit on site. To mitigate overlooking, windows on the first-floor level are limited to secondary windows only with obscure glass proposed.

Regarding PW5, the facade consists of brick, perforated brick and a green wall. The facade elements will ensure neighbouring privacy is not compromised, whilst light transmission through the facade is minimised.

The **Sunlight, Daylight & Overshadowing Report** concludes as follows in relation to overshadowing;

- **St Catherine's Avenue** – No additional shading visible from the proposed development on these existing residential properties. Overall, there will be a negligible impact to these existing properties.
- **South Circular Road** (south of the proposed development) – No additional shading visible from the proposed development on these existing residential properties. Overall, there will be a negligible impact to these existing properties.
- **South Circular Road** (west of the proposed development) - additional shading visible from the proposed development on these existing residential properties early mornings in March (0800-1000) and June (0800). Overall, there will be a minor impact to these existing properties.
- **St Teresa's Church** (north of the proposed development - additional shading noted to the church and grounds, similar to that of the Development Framework for St. Teresa's Gardens and Environs.
- **Donore Avenue** (north of the proposed development - no additional shading visible from the proposed development on existing residential properties. Overall, there will be a negligible impact to these existing properties.



The vertical sky component (VSC) study included in the report concludes that 96% of the points tested have a value greater than 27% or not less than 0.8 times their former value (that of the Existing Situation), exceeding the BRE recommendations. This increases to 99% when compared against the Development Framework plan. The majority of the values outside the recommendations are achieving high values between 24% and 26% and therefore good levels of light should still be received within the spaces beyond. In summary there will be a minor impact on existing adjacent properties as a result of the proposed development.

The proposed development is of high-quality design, having a lasting positive impact on the new identity of the area. The approach to height and scale will further ensure the sustainable use of this brownfield site and the achievement of more compact urban development. Redevelopment of the Player Wills site presents a unique opportunity to facilitate a much-needed large-scale housing project near the centre of Dublin, close to where people work.

This application is accompanied by a **Material Contravention Statement** with regard to height and provides a rationale for An Bord Pleanála to approve the proposed development having regard to the provisions of Section 9(6) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) and Section 37(2)(b) of the Planning and Development Act 2000 (as amended).

### 7.2.1 Assessment Criteria for Higher Buildings

Section 16.7.2 of the Dublin City Development Plan requires that all proposals for mid-rise and taller buildings must have regard to the assessment criteria for high buildings as set out below:

- *Relationship to context, including topography, built form, and skyline having regard to the need to protect important views, landmarks, prospects and vistas*

The height strategy is considered appropriate having regard to the site context, being in a strategic urban location, close to the city centre and within close proximity to public transport corridors. The tallest buildings are located towards the centre of the site. Residential blocks PW4 and PW5 are two to four storeys in height and therefore respect the surrounding dwellings in the area. The PW1 building which incorporates the original Player Wills factory building is staggered from South Circular Road towards the centre of the site and varies in height from five to eight storeys with the lower element along the southern boundary of the site where it adjoins neighbouring low-rise residential dwellings. The tallest building situated towards the centre of the site is Block PW2, it ranges in height from two to nineteen storeys and has been located centrally so as not to have an overbearing presence along the streetscape and to create a modulated approach to building height.

The **Landscape and Visual Impact Assessment**, taken together with a comprehensive set of **Photomontages** prepared by Modelworks, provides a detailed assessment of this matter and demonstrates that the proposed development will not adversely impact on important views, landmarks, prospects and vistas.

- *Effect on the historic environment at a city-wide and local level*

Cognisant of the site's proximity to Protected Structures and historic landmarks in the wider City, a suite of dedicated photomontages is included with this application **Verified Photomontages to Accompany Cultural Heritage Assessment**. They were used to form the basis of the impact assessment included in Chapter 14; Built Heritage contained within the EIAR (Volume II).

Verified photomontages were prepared in order to assess the potential visual impact of the proposed development on the following structures:

- Christchurch Cathedral
- St. Patrick's Cathedral
- Dublin Castle
- Trinity College Dublin
- Royal Hospital Kilmainham

It is noted that the proposed development is not visible in views of any of these landmark buildings.

The visual impact assessment contained in the Built Heritage chapter concludes that the impact of the proposed development on the architectural heritage character of the wider setting has been mitigated through various design decisions, including the material palette used, the stepping down in height of the blocks at the perimeter of the site, and the siting of taller blocks in the centre of the site. The residual impact of the proposed development on the architectural heritage character of the subject site and the surrounding context is deemed to be positive.

- *Relationship to transport infrastructure, particularly public transport provision*

As set out in section 2.2 and the **Traffic and Transport Assessment** that accompanies this application under separate cover, the proposed development site benefits from a high level of accessibility to public transport services, including high-capacity LUAS services, high frequency Dublin Bus services and planned future infrastructural improvements under the proposed BusConnects programme.

- *Architectural excellence of a building which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for*

The articulation of the towers in PW2 has been developed to respond to a desire for a slender expression, whilst responding to the fundamental demands of building efficiency and the responsible use of resources. By breaking down the mass of each tower into separate elements, the towers as proposed incorporate an expression of a grouping of taller units, each of which is more-slender than the target 3:1 ratio as illustrated in section 7.2.

- *Contribution to public spaces and facilities, including the mix of uses*

The proposed development incorporates a multitude of destinations. There is a diversity of public open spaces including 2 no. public parks, 'Player's Park' conceived for both active and passive recreation and St. Catherine's Park, a children's playground designed for a variety of age groups.

The proposed public realm improvements to South Circular Road and the internal street network that is pedestrian focussed and provides for permeability through to the wider SDRA 12 lands will significantly enhance the local streetscape.

The ground floor of the former factory building (PW1) encompasses a community/cultural/artistic hub together with retail, food and beverage set around the retained public courtyard that will invigorate the building.

The proposed PW2 building incorporates 2 no. retail units and a café/restaurant.

A childcare facility will serve the needs generated by the proposed development together with identified need in the wider surrounding neighbourhood.

Together, the wide range of non-residential uses proposed will promote vitality and vibrancy in this new urban quarter.

- *Effect on the local environment, including micro-climate and general amenity considerations*

Please refer to the suite of accompanying assessments which includes a **Daylight, Sunlight and Overshadowing Report** and **Pedestrian Comfort Report**, submitted under separate cover in support of this proposal. These reports conclude that the impacts of the development on the local environment and associated with sunlight, overshadowing and micro-climate are all within acceptable limits.

- *Contribution to permeability and legibility of the site and wider area*

The proposed development has been carefully designed to be fully integrated with the South Circular Road, Donore Avenue and St. Catherine's Avenue, as well as the wider SDRA lands. Pedestrian and cyclist movement through the site will be prioritised through the provision of shared street spaces and dedicated links that will enhance permeability of this isolated, former industrial site, achieving a key objective in the City Development Plan.

- *Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, a 360-degree view analysis, shadow impact assessment, wind impact analysis, details of signage, branding and lighting, and relative height studies*

This application is accompanied by a comprehensive suite of reports / assessments to enable a detailed assessment of the proposed development, which individually and collectively address each of these issues.

- *Adoption of best practice guidance related to the sustainable design and construction of tall buildings*

The accompanying **Energy and Sustainability Report** submitted under separate cover in support of this application addresses compliance with a range of Building Regulatory, Sustainability and Energy Efficiency standards that are integral to the design and ongoing operation and management of the scheme. There are five main criteria that the reports outline and demonstrate compliance with:

- Building Energy Rating
  - Energy Performance Coefficient (EPC)
  - Carbon Performance Coefficient (CPC)
  - Renewable contribution
  - Maximum elemental U-Values
- *Evaluation of providing a similar level of density in an alternative urban form*

Alternative Masterplan Framework solutions were investigated during evolution of the accompanying Masterplan document. A range of land use and design options were evaluated with the aim of creating a new mixed-use urban quarter that achieves the regeneration objectives for SDRA 12. The proposed development in its current form aims to provide a high-quality urban development that responds to the locational context and secures the delivery of the connecting public open space on Dublin City Council lands. The current proposal for the Player Wills site, primarily a high-density residential development, was determined to be the preferred scenario for the following reasons:

- The non-residential / mixed-uses are not too dispersed throughout the SDRA lands – it was ultimately concluded that these should be concentrated on the Player Wills lands where there is scope for greater accessibility by the wider community;
- The viability and integrity of Cork Street as a community hub will not be undermined;
- Enhanced permeability/connectivity through the Player Wills site, in cognisance of its limited frontage to the existing road network, especially along the South Circular Road;
- The creation of a ground level streetscape which will provide new connections to the adjoining lands and enhance legibility;
- A coherent and efficient arrangement of blocks which will deliver sustainable residential density in an efficient manner that corresponds with national planning objectives.

The proposed development site forms part of a larger landbank in the ownership of the Applicant that has enabled a coordinated, integrated approach to the planning of future development in this location and will aid in securing the wider regeneration objectives for this site. This Masterplan process has been undertaken in close conjunction with Dublin City Council and is intended to progress development of the Applicant's landholdings and also ensure that the public interest is served through redevelopment of the connecting Council lands for a public park and playing pitches.

This report is accompanied by a range of supporting documentation which demonstrates that the proposed development which incorporates two buildings in excess of 50m is consistent with the higher-level objectives to:

- Achieve densification;
- Deliver much needed housing;
- Create a sense of place;
- Ensure regeneration of a strategic urban brownfield site;
- Promote a modal shift; and
- Protect and enhance the surrounding land uses and environment.

### 7.3 Residential Unit Mix

It is proposed to develop a Build to Rent development incorporating a majority of apartment units (492 no.) and 240 no. single occupancy shared accommodation private living areas.

Cognisant of the continuing trend toward smaller household formation across the State, the scheme includes 492 no. new homes and 240 no. shared accommodation private living space that respond to this market.

The proposed mix has been selected as a direct response to the significant market demand within the private rental sector, particularly in this part of Dublin City.

#### 7.3.1 Shared Accommodation

Section 5.18 of the Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018) requires proposers of a shared accommodation scheme to demonstrate to the planning authority that their proposal is based on accommodation need and to provide a satisfactory evidential base. Accordingly, a report entitled **Shared Accommodation Demand Report** accompanies this application under separate cover and should be read in conjunction with this section. It identifies that the drivers for shared accommodation at this location are;

- Proximity to high density employment zones
- Population growth and floating population (i.e., people who move frequently for employment)
- Demand generated by graduates
- Shortfall in new homes
- Affordability issues
- Shift toward private renting

It confirms that the proposed development site meets the locational criteria for shared accommodation being an urban inner-city location, proximate to high quality and frequency public transport and proximate to high density employment zones.

In determining the suitability of this site for shared accommodation, the report notes that there is just 1 no. permitted development to the south of the city and within the canal cordon. This development is at New Row South, Dublin 8 and will deliver 69 no. shared accommodation private living bed spaces. The next closest permitted development is in Rathmines, outside the canal cordon and approx. 1.5kms from the proposed development site. Having regard to the distance of permitted developments from the subject site, the relatively low number of bedspaces permitted, and the fact that permissions for shared accommodation have not translated to operational schemes, this current proposal would not result in an overconcentration of shared living units locally or in the wider city.

The report establishes that consistent with longer term trends toward smaller household sizes, 69% of households within the Merchants Quay F ED are comprise 1-2 person households, even greater than the surrounding study area (66%), Dublin City (60%) and the State (52%). Further, 1-person households in Merchants Quay F ED account for 36% of all households. Again, this figure is higher than in the wider area, with 1-person households being 32% in the study area and 28% in Dublin City.

The disparity between the existing housing stock and significant proportion of 1- and 2-persons households highlights the importance of diversifying the range of accommodation types to respond to the needs of all households and their changing requirements over time. The census data shows that the profile of existing housing in this highly accessible urban location has not kept pace with changing needs, particularly for smaller households comprising young professionals, couples without children and empty nesters.

The report highlights that the undersupply of housing in the City has resulted in a high proportion of young adults continuing to reside in the family home. 11.8% of families in the Merchants Quay F ED are made up of families where the oldest child is an adult (20 years or over) and this figure rises to 28% in the wider area, Dublin South Central. This trend has direct social and economic impacts. Renting a private living area in a shared accommodation complex would create a bridge for young adults wanting to leave home and pursue their career in the city.

It is also noted that the largest proportion of private renters across Dublin are in the 30-34-year-old age cohort, followed by 25-29 year olds (20%). Trends also show that there has been a significant rise in the numbers of 35-39 year olds and the 40-44 year age group in the rental sector.

Merchants Quay F ED has a particularly high number in this age category of working adults, with the 25-44 age group accounting for 49% of the population, significantly greater than the national average of 29.5%. Thus, taking into account the age profile and proportion of private renters locally, it is envisaged that demand for rental accommodation in this location will remain high.

Decreases in vacancy rates within Merchants Quay F ED, the 1km study area and Dublin City were identified, reflecting the increased demand for available accommodation to meet housing need. This increase in housing demand is further reflected in the new dwelling completion numbers which shows that more dwellings were constructed in the Dublin 8 area compared with the surrounding Eircode districts since 2016, resulting in the highest number overall between 2017 and Q3 2020 (637 units).

At this strategically located brownfield site, the Player Wills redevelopment presents an opportunity to respond to the needs of the local population and workforce, by providing an appropriate mix of units that is aligned with housing need and market demand.

The proposed shared accommodation strikes a balance by providing much needed rental accommodation in traditional apartment type development and supplementing this provision with an element of shared living units, thereby catering to the varied needs of the rental market.

### 7.3.2 Build to Rent Apartments

The subject site has the capacity to make a substantial contribution to the provision of new residential stock in an accessible location, well served by public transport and social infrastructure. Redevelopment of the site will also deliver a mix of non-residential uses to meet the needs of the wider community and realise local and national planning objectives.

SPPR 1 of the 2018 Apartment Guidelines states that statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan.

The Dublin City Development Plan 2016-2022 was adopted prior to publication of the Guidelines. A variation (No. 7) was adopted in March 2020. The purpose of the Variation is to incorporate NPF and the RSES into the City Development Plan 2016 – 2022, in accordance with Section 11 (1) (b) (iii) of the Planning and Development Act, 2000, as amended. It is noted that the Variation did not include specific housing mix detail, rather it references as follows;

“Guidance in relation to housing provision and data (Housing Need Demand Assessment) is to be forthcoming as part of new statutory guidelines on development plans and the review of development plans by the Department of Housing, Planning and Local Government (DHPLG).”

It is noted that SPPR 8 (i) provides that for BtR developments there is no restriction on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise.

The total number and mix of apartments are set out below.

Building Ref.	Studio	1 Bed Apartment	2 Bed Apartment	3 Bed Apartment	2 Bed Duplex Apartments	3 Bed Triplex Apartments	Total
PW 1	12	23	8	4	-	-	47
PW 2	16	268	92	38	1	-	415
PW 4	-	-	-	-	2	7	9
PW 5	12	1	5	3	-	-	21
<b>Total</b>	<b>40</b>	<b>292</b>	<b>105</b>	<b>45</b>	<b>3</b>	<b>7</b>	<b>492</b>

**TABLE 23 PROPOSED APARTMENT UNIT MIX**

The proposed mix as a percentage of the overall Build to Rent (BtR) apartments is;

- 40 no. Studios – 8%
- 292 no. 1 Bed Apartments – 59%
- 108 no. 2 Bed Apartments– 22%
- 52 no. 3 Bed Apartments– 10%

The proposed development provides for a wide range of households from individual occupation through to accommodation suitable for families. The mix evolved following a detailed assessment of the existing demographic, housing and employment profile in a wide study area and this is presented in the **Apartment Unit Mix Justification Report**, see **Appendix 1**.

The report concludes that key statistics from the assessment of the area profile supports the proposed mix of apartment units. They include;

- The existing housing stock in the ED and the study area is predominantly house/bungalow. It can be reasonably concluded that they contain 2 and more bedrooms.
- Apartments/flats account for approx. 40% of the existing housing profile and given the vintage of the housing stock, it can reasonably be concluded that the majority are houses converted to flats that may have suboptimal living conditions.
- Across the City, owner occupied homes is the predominant tenure.
- Across the City, study area and ED at least 60% of households comprise 1-2 persons and more homes are required for this smaller household formation.
- Affordable homes for modest income earners are required.
- Birth rates are continuing to fall since 2009 and the City has one of the lowest young dependency ratios (0-14 year olds) in the State, at 27.9%.
- There is a high concentration of work opportunities proximate to the site, particularly health related employers.

viii. The site is highly accessible by public transport to the wider city area for employment opportunities.

Combined, these factors highlight that there is a pressing need for a high-quality rental offering in this area, that responds to smaller household formations while also providing for accommodation suitable for families, to allow opportunities for people to continue to live in rented accommodation close to the city centre.

Accordingly, the greatest concentration in mix is studio and 1 bed apartments, 67%, with the balance incorporating 2 bed plus homes.

## 7.4 Social & Affordable Housing

Part V requirements under the Planning and Development Act 2000, as amended, apply to Build to Rent developments.

The DHPCLG Housing Circular 36 2015, Section 96 (3) sets out six types of Part V agreement that may be made, including:

- i. Transfer of lands (Section 96(3), paragraph (a));
- ii. Build and transfer of up to 10% of the proposed housing units (Section 96(3), paragraph (b)(i));
- iii. Transfer of housing units on any other land in the functional area of the planning authority (Section 96(3), paragraph (b)(iv));
- iv. Lease of housing units either on the subject site of the application or in any other location within the functional area of the planning authority (Section 96(3), paragraph (b)(iv));
- v. Combination of a transfer of land and one or more of the other options; and
- vi. Combination of options not involving a transfer of the ownership of land (Section 96(3), paragraph (b)(viii)).

Part V does not apply to the Shared Living aspect of the proposed development. Accordingly, 49 no. Part V units are proposed.

The Applicant has engaged with Dublin City Council regarding their Part V obligations and this submission is accompanied by a Part V report that includes a letter of validation from Dublin City Council's Housing Department.

## 7.5 Density

Policy QH8 of the Dublin City Development Plan seeks to promote the sustainable development of vacant or underutilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and character of the area.

The gross density is 239 units per hectare and the net density (excluding lands owned by DCC and the area reserved for a school extension) is 321 units per hectare.

The proposed density is appropriate given the National Policy objective to increase residential density in existing urban brownfield locations as set out in the National Planning Framework.

The objective to achieve higher densities in appropriate urban locations within Dublin, is articulated in Section 4.5.3.1 of the City Development Plan:



*“Higher densities will be promoted in the city centre, within KDCs, SDRAs and within the catchment of high capacity public transport. The density standards set out in this plan will promote the development of high quality, sustainable densities and the consolidation of urban form.”*

The location of the site close to public transport links including Fatima LUAS stop, South Clondalkin QBC along Cork Street / Dolphin’s Barn Street and additional Dublin Bus services on the South Circular Road ensure that the site is well connected. This level of accessibility coupled with the site’s location within SDRA 12 and c.2km from the city centre are consistent with the objective in Section 4.5.3.1 of the City Development Plan regarding suitable urban locations for higher densities.

Although the City Development Plan does not contain specific density standards for development, higher density development is explicitly supported, subject to the satisfaction of relevant performance criteria and design considerations. Other numerical standards relating to plot ratio and site coverage will have a bearing on the density achieved within a development site.

The current application satisfies the relevant policies of the City Development Plan for Sustainable Residential Areas, detailed in Section 5.5.2, as follows:

- *QH5 - To promote residential development addressing any shortfall in housing provision through active land management and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites.*

The current shortfall in housing provision is well documented and successive national planning policies including Rebuilding Ireland (2016) and the National Planning Framework (2018) reflect the Irish Government’s commitment to addressing this matter. Against this backdrop, the current SHD proposal includes a substantial quantum of residential units that will deliver much needed housing in a mix of units that respond to the needs of the local population and workforce.

A Masterplan is submitted under separate cover which reflects the strategic approach which has been adopted to ensure that redevelopment of this site is undertaken in a coordinated manner. High quality design has been embraced to ensure that the proposed development responds to the site’s established residential setting and urban context. The scheme will deliver a high-density residential development at a key under-utilised location that is appropriately zoned and has been identified for regeneration under the City Development Plan (SDRA 12).

- *QH6 - To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.*

This SHD proposal will create a sustainable new community by providing a range of unit typologies that cater to the needs of residents and the local workforce which includes shared accommodation units which are aimed at young professionals. The mix of unit types proposed is consistent with the aims of the DCC Housing Strategy, particularly having regard for the continued trend toward smaller household sizes which is reflected in the specific housing needs of this Dublin 8 community where there is sustained and significant demand for predominantly studio’s and 1-bedroom apartments, and to a lesser extent, 2-bedroom apartments. The inclusion of Part V units within the scheme will further address housing need and ensure a balanced social mix.

The proposed residential scheme reflects a sustainable approach to housing provision whereby current housing demands are met, with the opportunity for studio and 1-bedroom in particular, to be adapted/amalgamated in the future to respond to changing market conditions and household needs. There would also be the opportunity for those living in the Shared Living units to move into larger apartments within the proposed development should their living needs change.

The scheme incorporates a substantial quantity and diversity of resident amenities and facilities (see section 5.3 and 5.4) and public and communal amenity spaces (see section 5.5), designed to create opportunities for social interaction and integration of the resident population.

High standards of urban design, quality public realm and amenity spaces will all contribute to the creation of a vibrant and sustainable new urban quarter with a unique identity and sense of place. Future delivery of the balance of the Masterplan and the permitted Bailey Gibson site will ensure additional retail, community and recreational facilities are provided to fulfil the overarching regeneration objectives for SDRA 12 in an integrated and cohesive manner to address the needs of the future resident population, as well as the wider community.

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

The subject site is situated in close proximity to high capacity and high frequency public transport services, in a central urban location earmarked for regeneration. These conditions necessitate the delivery of high-density development at this site to comply with the consolidation and sustainability objectives of the City Development Plan. As demonstrated in the accompanying **Architectural Design Statement** and **Masterplan** documents, the highest standards of architecture have been embraced within the scheme.

The design of buildings has been underpinned by core principles of legibility and visual coherence, visual variety and durability with respect to their external appearance. The overall scheme has been designed to respond to the site context and integrate with surrounding development through the provision of quality public realm and open spaces, as well as enhanced connectivity and permeability.

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

The subject site is recognised within Section 15.1.1.15 of the City Development Plan as having potential for the provision of much needed high-density living space. In its current form, the subject site is significantly under-utilised and has been vacant for a number of years. Therefore, the site presents a considerable opportunity to achieve a high-density residential development in this central and accessible urban location.

- *QH9 - To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.*

The phasing plan has been developed to enable a programme of construction that responds to the constraints of this urban infill site, minimise disruption to the local community and ensure that the delivery of services and amenities meets the needs of new residents.

- *QH10 - To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities.*

The principles of connectivity, permeability and legibility are fundamental to the design approach for the proposed development. These design principles are articulated in detail in the accompanying Architects **Design Statement** and **Masterplan** documents which set out how the scheme has evolved to assimilate with the surrounding urban environment and established resident population, creating a cohesive, integrated and inclusive new community.

- *QH11 - To ensure new developments and refurbishments are designed to promote safety and security and avoid anti-social behaviour in accordance with the Safety and Security Design Guidelines contained in Appendix 14.*

This SHD proposal has been designed to promote activity and movement through a network of shared street spaces and so provide a safe and secure environment for residents. The perimeter block system has been developed to clearly delineate public and private areas and ensure legibility so that there is a clear function and purpose to the buildings and spaces. In addition, own-door units will be located at ground level to optimise passive surveillance opportunities within the site.

The public realm will contain appropriate landscaping and boundary treatments, public lighting and robust materials to deter anti-social behavior by avoiding the creation of blank facades, dark or secluded areas and enclosed public areas.

Section 16.4 of the City Development Plan requires:

*“All proposals for higher densities must demonstrate how the proposal contributes to place-making and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods.”*

The enclosed **Masterplan** and **Architectural Design Statement** submitted under separate cover, provide a detailed outline of how redevelopment of the proposed site will contribute to ‘place-making’ in this central urban location. In addition, a **Social Infrastructure Audit** is enclosed with this submission, providing an overview of community facilities within the locality.

In brief, this SHD proposal has been carefully developed to embrace the established residential character of the South Circular Road through a scheme that is sympathetic in scale and design to its distinctive residential character. At the same time, it seeks to respond to the site’s urban context and the regeneration objectives of the City Development Plan for SDRA 12 by creating a sustainable, contemporary and vibrant new neighbourhood with an appropriate level of density for this highly accessible location near Dublin city centre.

The design approach has been to provide landmark buildings and create a modulated, dynamic skyline that is simultaneously sensitive to its surrounds and creates a sense of place. The proposed public realm and future integration with the wider Masterplan area through a network of new connections will promote social interaction and permeability/increased movement, through high quality design and an appropriate mix of uses that promote activity in line with the SDRA 12 Masterplan.

The provision of extensive resident amenities / services and open spaces will further enhance the liveability of this scheme for future occupants.

## 7.6 Plot Ratio

The subject site is zoned Z14 – Strategic Development and Regeneration Area in the Dublin City Development Plan 2016 – 2022, which identifies the proposed residential development as permissible. The indicative plot ratio for Z14 lands is between 1.0 - 3.0 and for Z1 lands is 0.5-2.0.

The Development Plan further states that higher plot ratios may be permitted in certain circumstances such as:

- Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed; and
- To facilitate comprehensive redevelopment in areas in need of urban renewal.

The plot ratio for this SHD proposal is 2.19 and accordingly, this plot ratio is within the Development Plan's acceptable standards.

## 7.7 Site Coverage

As with plot ratio standards, the Development Plan allows for higher site coverage in certain circumstances such as:

- Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed; and
- To facilitate comprehensive redevelopment in areas in need of urban renewal.

For Z14 zoned lands, the indicative site coverage is 50% and for Z1 lands it is between 45% and 60%. The proposed site coverage is 31%. This site coverage protects against the adverse effects of over development and safeguards the amenities of adjacent permitted development.

Whilst the site coverage for the proposed development falls below the City Development Plan indicative target. The circumstances of this site are such that enhanced connections, permeability and open space are integral design components and mandate that the appropriate density targets for this site should be achieved by increased height, rather than relying on site coverage as a suitable measure.

The importance of creating a high density residential scheme to secure the regeneration objectives for this site and integrate with future development of the wider SDRA 12 area, requires that an appropriate design response be embraced.

## 7.8 Apartment Standards

Section 16.10.1 of the City Development Plan sets out the standards for apartment developments, having regard to the *Design Standards for New Apartments Guidelines* (2015). These guidelines were subsequently updated by the Minister and are superseded by 2018 Guidelines.

The proposed development has been designed with full regard to the apartment design parameters in the Guidelines including, inter alia, unit mix, size, internal space standards, dual-aspect ratios, amenity spaces, car and cycle parking provision.

The **Housing Quality Assessment** submitted under separate cover details the compliance of the proposal with the relevant requirements of the 2018 Guidelines.

### 7.8.1 Dual Aspect

It is a policy requirement that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e. on sites close to high quality public transport or where it is necessary to ensure good street frontage and subject to high quality design.

As outlined in section 8.4, it is reasonably concluded that the proposed development site sits between being a central/accessible site and an intermediate site. SPPR 4 (i) instructs a requirement for 33% dual aspect apartments on central sites and SPPR 4 (ii) requires that in suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme. Notably the guidelines highlight that ultimately, the daylighting and orientation of living spaces is the most important objective.

Considerable attention (see **Architectural Design Statement**) has been paid to optimising dual aspect units and the proposed design achieves 51% across the apartment component of this proposal. Additionally the daylight analysis that accompanies this application demonstrates that living spaces across the scheme perform very well.

## 7.9 Open Space

### 7.9.1 Public Open Space

The proposed development site forms part of SDRA 12, a landbank of 11.65 hectares (DCC lands, the Coombe site, part of Bailey Gibson and the Player Wills site) and the overarching objective is to achieve regeneration of these lands in an integrated manner.

To achieve this integrated vision, it is a requirement of the Dublin City Development Plan 2016-2022 that at least 20% (2.33 hectares) of the land identified as SDRA 12 be retained for public open space, recreation & sporting facilities including an area to facilitate organised games.

The overall guiding principles for SDRA 12 are set out in section 15.1.1.15 of the DCDP. Of relevance to the provision of public open space are;

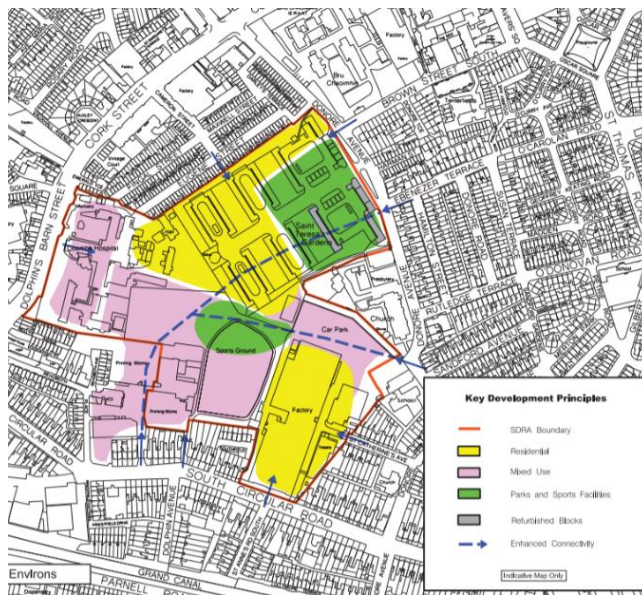
*“The development of a network of streets and public spaces will be promoted to ensure the physical, social and economic integration of St Teresa’s Gardens with the former Player Wills and Bailey Gibson sites, with further integration potential with the sites of the Coombe Hospital and White Heather Industrial Estate;*

*A vibrant mixed-use urban quarter will be promoted with complementary strategies across adjoining sites in terms of urban design, inter-connections and land-use. To provide for an area zoned sufficient in size to accommodate a minimum 80 m by 130 m playing pitch.*

*A new public park is proposed as a landmark feature with passive supervision by residential and other uses; it will have a comprehensive landscaping strategy to provide significant greenery within the scheme and will make provision for a diverse range of recreational and sporting facilities for use by the wider neighbourhood.”*

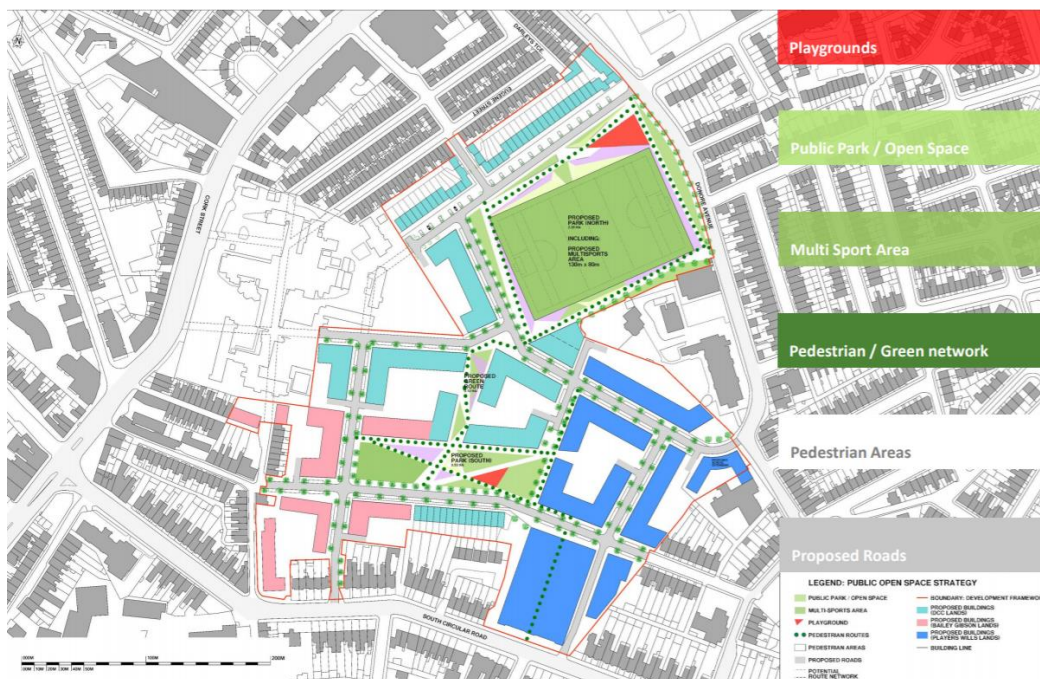
Based on this, the 20% public open space provided for in the Dublin City Development Plan would be made up of a playing pitch (1.04 hectares) with the balance (1.29 hectares) achieved primarily through the delivery of a public park.

The indicative layout included in the Dublin City Development Plan and reproduced below envisages that this 20% open space (shaded green) would be provided on lands owned by Dublin City Council.



**FIGURE 39 INDICATIVE LOCATION OF PARKS & SPORT FACILITIES (EXTRACT FROM DCDP 2016-2022)**

The 2017 Development Framework for St. Teresa’s Gardens and Environs translates the requirements and principles of the current City Development Plan on the Planning and Development of the SDR4 12 lands. The Framework refines the SDR4 landbank excluding the Coombe lands and including all of the Bailey Gibson site. The total area considered in the Development Framework is 10.30 hectares (i.e. 1.35 hectares less than the SDR4 12 landbank) and the objective in the DCDP to provide 20% as public open space is carried forward into this non-statutory plan. Thus, a public open space provision of 2.06 hectares is required.



**FIGURE 40 DEVELOPMENT FRAMEWORK DISTRIBUTION OF PUBLIC OPEN SPACE**

The land included in the Masterplan that accompanies this application mirrors the Development Framework land bank. The Masterplan identifies 3 no. public open spaces (see Figure 41) distributed across the plan area, including;

- i. a multi-purpose playing pitch and adjacent open space (22,900 sq.m) on Dublin City Council lands;
- ii. a public park located between the Bailey Gibson and Player Wills sites (3,960 sq.m) on Dublin City Council lands;
- iii. a local park (1,350 sq.m) adjacent to St. Catherine's National School on the Player Wills site.

Together, they cover an area of 28,210 sq.m. (2.821 hectares).



**FIGURE 41 MASTERPLAN DISTRIBUTION OF PUBLIC OPEN SPACE**

As outlined above, to meet the 20% Dublin City Development Plan objective for the entirety of the lands identified as SDRA 12, 2.33 hectares of public open space would be required and to meet the requirements of the Development Framework 2.06 hectares is required.

The Masterplan includes 2.821 hectares of public open space and so exceeds the 20% required for SDRA12 and the public open space required for the adjusted 20% for the Development Framework. It is therefore compliant with the requirements of the Dublin City Development Plan as it relates to public open space.

Separately, section 16.3.4 of the DCDP, Public Open Space – All Development, establishes a requirement for 10% public open space for residential schemes. It clearly establishes that this requirement also relates to other zonings and highlights that on Z12 zoned lands, the requirement will be 20% accessible open space, and for Z15 zoned lands the requirement will be 25% accessible open space and/or provision of community facilities. However, this section is silent regarding the requirement for Z14 lands.

Given that the Dublin City Development Plan explicitly states that there is a 20% requirement for SDRA12, it is our professional planning opinion that this 10% public open space requirement attaching to each new residential development can be used towards meeting the overall 20%.

This opinion is derived from the consequence that would arise if the 20% public open space stipulated for Z14 lands together with the additional 10% was required i.e. 30% for each development plot within SDRA 12. This scenario would result in;

- i. a failure to maximise the development potential of this strategically located inner city brownfield site to achieve compact growth principles; and,
- ii. an uncoordinated distribution of public open space across the SDRA 12 lands.

The application area is 3.06 hectares, this represents 26.3% of the SDRA 12 lands. Proportionally, to achieve the 20% SDRA 12 requirement, would require 0.54 hectares of public open space.

The proposed development includes a cumulative total of 0.63 hectares public open space;

- i. 'Players Park' (3,960 sq.m)
- ii. 'St. Catherine's Park' (1,350 sq.m)
- iii. PW 1 courtyard (690 sq.m) in block PW1
- iv. Public plaza (320 sq.m) between proposed blocks PW and PW4.

The proposed development is therefore in compliance with the Dublin City Development Plan's requirement for 20% public open space and provides an additional 900 sqm.

Should An Bord Pleanála consider that the intention of the Dublin City Development Plan is for each site to provide 20% plus the 10% set out in 16.3.4, we set out below the consistency of this proposed development under this scenario.

The proposed development site incorporates 3.06 hectares of which 2.39 hectares is the Player Wills site where it is proposed to develop a residential led mixed-use scheme. Residential development is not proposed on the balance of the application area, the 0.67 hectares under the control of Dublin City Council. This is included in the application area to facilitate the development of the proposed public park, 'Players Park', a public road that will connect the Bailey Gibson and Player Wills site and for and connections to municipal services at Donore Avenue. Accordingly, the requirement for 10% public open space is applied to the Player Wills site only and 0.239 hectares is required to satisfy this.

As identified above, the proposed development includes a local park (1,350 sq.m), 'St. Catherine's Park' within the Player Wills site. Additionally, the existing courtyard (690 sq.m) associated with the former factory building is retained as part of the proposed building PW1. There is also a public plaza (320 sq.m) included in the proposed development, it occupies the area between proposed buildings PW4 and PW5. The cumulative public open space on the Plater Wills site is 0.236 hectares. There is thus a shortfall of 30sq.m to meet the 10% public open space requirements of the Dublin City Development Plan.

The DCDP highlights that in the event that a site is considered by the planning authority to be too small or inappropriate (because of site shape or general layout) to fulfil useful purpose for public open space, then a financial contribution towards the provision of a new park in the area, improvements to an existing park and/or enhancement of amenities shall be required.

The Dublin City Council Development Contribution Scheme 2020 to 2023 includes at point 10, a section entitled Contribution in Lieu of Public Open Space. It states that;

*The Dublin City Development Plan provides the discretion to the Council to determine a financial contribution in lieu of all or part of the public open space requirement for a particular development. The Plan provides that in the event of the planning authority considering a site to be too small or inappropriate to fulfil Dublin City*



*Development Plan requirements for public open space provision a financial contribution of €4,000 per unit towards provision of or improvements to a park and/or enhancement of amenities in the area in line with the City's Park Strategy shall be required.*

The landscape design strategy is to fulfil the obligations of the Dublin City Development Plan with respect to public open space provision while ensuring high-quality, attractive and user-friendly spaces. The design maximises the amount of open space that can be provided on the Player Wills site while ensuring that the national planning objective for compact growth is achieved. There is a small shortfall of 30 sq.m in the submitted layout and the Applicant is satisfied to accept a financial contribution in lieu of the open space deficit.

#### 7.9.2 Communal Open Space

The proposed development exceeds the minimum communal open space amenity for all blocks PW1, PW2, PW4 & PW5. In the case of PW4 & 5, this amenity area is provided at courtyard level, while in Block PW2 the area is provided for at courtyard and roof terrace level. In PW1 a roof terrace is provided.

Across the scheme, 2,891 sq.m is required and 3,269 sq.m is provided.

### 7.10 Car & Cycle Parking

The standards applicable to the subject site set out in the DCDP is a maximum of 1 space per residential unit. The plan does emphasise that the standards are maximum in nature and may be reduced based on the location suitability, access to alternative modes, availability of car clubs and electric car charging points. It is also necessary to adequately demonstrate that lack of car parking on the site should not reasonably give rise to negative impacts on the amenities of surrounding properties or on the immediate street once the development is occupied – and that there is no potential negative impact on traffic safety.

Further, Section 16.38.9 of the Development Plan states:

*“Car parking standards are maximum in nature and may be reduced in specific, mainly inner-city locations where it is demonstrated that other modes of transport are sufficient for the needs of residents.”*

Specific Planning Policy Requirement 8 (iii) of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities states that *“there shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.”*

The proposed level of car parking provision is at a rate of 0.30 spaces per apartment unit, commensurate with the site's proximity to Dublin City and accessibility to high capacity and high frequency public transport services. A comprehensive evidenced based justification for the parking ratio is set out in the **Traffic and Transport Assessment**.

The Table below compares the proposed long stay car parking against the maximum standards of the Development Plan. It should be noted that parking is limited to the Build to Rent apartment units only. Due to the nature of shared accommodation (i.e., single occupancy and young demographic) dedicated parking will not be provided, however, recognising that occupants of the shared accommodation may require access to a car, 20 no. car parking spaces are reserved for a car sharing club.

Type	DCC Standards	Design Standards for New Apartments	Proposed
Car Parking	1 per residential unit 492 (max)	Minimal/Significantly Reduced	148

**TABLE 24 PARKING PROVISION**

Of the 148 car parking spaces proposed, 19 no. (8%) will be dedicated for disabled parking. This exceeds the DCDP requirement of 5%. 20 no. spaces will be reserved for car sharing, 'Go-Car' or similar.

Notably, the Plan does not stipulate a requirement for short stay car parking, rather it advocates assessment on a case-by case basis. To protect the public realm and encourage a modal shift, 37 no. on-street car parking spaces are proposed, with 3 no. dedicated to disabled parking and 3 no. acting as set down for the proposed childcare facility.

The car parking strategy is complemented by a sustainable travel plan (see accompanying **Mobility Management Plan**) which underpins the scheme and will promote active modes of travel.

A significant quantum of bicycle parking spaces is proposed within the development. In total, 903 no. long stay bicycle spaces shall be provided, in secure covered storage areas for residents and 110 no. short stay cycle parking spaces will be located at grade. This provision of cycle parking significantly exceeds the DCC long-stay cycle standard which would require 732 no. spaces. It is slightly less than the requirements of the Design Standards for New Apartments which would require 944 no. long stay spaces.

The Development Plan objective to reduce car parking provision in appropriate locations and promote more sustainable modes of travel aligns with recent national policy guidance, specifically SPPR 8 of the Design Standards for New Apartments (2018). SPPR 8 provides for substantially reduced car parking provision in central and/or accessible locations that are well served by public transport.

### 7.11 Visual Impact

The accompanying **Architectural Design Statement** submitted under separate cover, provides a detailed description of the architectural design approach which has underpinned the proposed development.

A brief synopsis of the architectural approach, having regard for the visual impact of the development, is as follows:

- The proposed residential led development at this site is consistent with the location of higher density, taller buildings in central urban locations.
- The height rationale and density of development is consistent with the regeneration objectives for SDRA 12, the Masterplan for the wider lands and has evolved in response to an extensive consultation process with Dublin City Council.
- The site benefits from high levels of accessibility to public transport and therefore meets the national and local planning objectives of consolidation and compact growth.
- The prominent location of this urban site necessitates an architectural response that enhances the Dublin skyline, whilst being sensitive to its residential setting, ensuring the scheme has the capacity to become a distinct place within the city.

- The height of the proposed scheme presents an opportunity for enhanced visual amenity at a site that is under-utilised and includes the prospect of *views out* of the scheme, as well as *views of* the development from the surrounding streetscape and further afield.
- The development retains the façade of the original Player Wills factory, which in turn reduces the impact of the new development facing out onto South Circular Road.
- The scale of the development has been carefully considered, with a focus on the central taller building elements which will create visual 'landmarks' or 'urban markers' of the scheme.
- The height of residential blocks is stepped down towards the sensitive site boundaries to respect the character of the area and does not exceed four stories where the block adjoins existing low-rise housing, in order to avoid an overbearing presence onto neighbouring properties and streets.
- Building façades which face directly towards the surrounding streetscape and proposed public realm are formed from a textured brick finish to integrate with the distinctive character of the established residential area, provide articulation and create a sense of domestic proportions.

A **Landscape and Visual Impact Assessment** is included in the EIAR and is supported by a suite of **Photomontages** that illustrate for each viewpoint (long and short range) the 'baseline', 'proposed development' and 'proposed development and wider masterplan'.

Separately, the **Cultural Heritage: Built Heritage** report contained within the EIAR assesses the impact of the proposed development on the adjacent conservation area, local Protected Structures and key heritage locations within the wider City.

## 7.12 Daylight and Sunlight Analysis

Please refer to the **Daylight, Sunlight and Overshadowing Study** and submitted under separate cover for further details regarding this matter. Key conclusions from the report are;

The Shadow analysis shows different shadows being cast from the existing, 2017 Development Framework and proposed schemes at particular periods throughout the year. Overall, the proposed development would cast minimal additional shading on neighbouring buildings. This is further quantified by the daylight analysis of existing buildings.

The Vertical Sky Component for 96% of the points tested have a value greater than 27% or not less than 0.8 times their former value (that of the Existing Situation), exceeding the BRE recommendations. This increases to 99% when compared against the Development Framework plan. The majority of the values just outside the recommendations are still achieving high values between 24% and 26% and therefore good levels of light would still be received within the spaces beyond.

The results also highlight that the proposed 'Players Park and 'St. Catherine's Park' public open spaces significantly exceed the BRE recommendations and will be high quality spaces in terms of sunlight received.

Based on the results of the rooms tested across the Player Wills site, 92% of the spaces tested within the proposed scheme have an Average Daylight Factors (ADF) above the recommended values, exceeding the BRE guidelines. This total would be expected to increase beyond 92% if all of the upper and outer paces across the development were included in the results.

## 7.13 Built Heritage

The accompanying **Architectural Design Statement** submitted under separate cover, provides a detailed description of the architectural design approach in relation to the retention of the original historic fabric of the former factory building which has underpinned the proposed development, and has been informed by a **Cultural Heritage: Built Heritage assessment** prepared by David Slattery Conservation Architects and included in the EIAR.

Chapter 11 of the Development Plan is focused on Built Heritage and Culture. Built Heritage is considered to contribute to a place's identity, its community, and to the richness and diversity of its urban fabric. The proposed development includes the retention of the original Player Wills factory building which will be retrofitted and adapted for use as a Shared Living block. It is worth noting that this building is not a Protected Structure but is listed on the NIAH.

- *CHC1- To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.*

The proposed development has been designed in order to retain and re-use the original Player Wills factory building, as this building adds to the character of the streetscape along South Circular Road and is a reminder of Dublin's Industrial Heritage in this area and in this regard considered to be a positive contribution to the area.

- *CHC6 - To ensure a sustainable future for historic and other buildings subject to heritage protection. The City Council will encourage, and support works to upgrade the environmental performance of the existing building stock that incorporates good standards of design and appearance.*

*Where these works involve historic buildings subject to protection (this includes buildings referenced on the Record of Protected Structures and non-protected structures in an Architectural Conservation Area), the works shall not adversely affect the special interest of the structure and thus a sensitive approach will be required, taking into account:*

- *The significance of the structure, and*
- *The extent of intervention, including impact on historic fabric, traditional construction, visibility, siting and design.*

*The installation of renewable energy measures and equipment will be acceptable where sited and designed to minimise the visual impact and does not result in any significant loss of historic fabric or otherwise affect the significance of the structure.*

The retention of the original Player Wills factory building as part of the proposed development will ensure a future use of this building which will, through its continued use, ensure excellent standards in terms of design and appearance. The environmental performance of the building will also be improved through its refurbishment. It is worth noting that none of the site is located within an Architectural Conservation Area, nor are any of the buildings on site included on the list of Protected Structures.

The proposed development of the Player Wills site successfully retains the historic fabric of the site combined with its layout and design fully integrates with the emerging pattern of development in the wider area including the SDRA 12 masterplan lands.

## 7.14 Sustainable Communities

The creation of good, sustainable neighbourhoods which support thriving communities and provide for a wide range of household types, age groups and tenures with community facilities close by is a priority of the Dublin City Development Plan and this is supported by a suite of policies and objectives contained within Chapter 12.

To ensure that applications for large new development integrate the necessary infrastructure to support community infrastructure, it is a policy requirement (SN5) that a social audit is included with the application together with a phasing programme. A **Social Infrastructure Audit** is included under separate cover, it informed the type and quantity of non-residential uses included in the proposed development and a phasing plan demonstrating the timing of the delivery of this infrastructure is presented in the **Construction Environmental Management Plan**. The proposed new facilities include a community hub, accessible to all, located in the former Player Wills factory with dedicated floor space to support arts and cultural related activities. A creche is included to provide for the needs of the proposed development together with the wider area. The inclusion of these uses together with neighbourhood scale retail, food and beverage complement the existing facilities already existing in the local area and so is consistent with Policy SN15, SN16, SN17, and SN18.

Policy SN19 seeks to enhance and improve the provision of playgrounds, play spaces, playing pitches and recreational spaces in residential areas. The proposed development includes significant opportunities for children's play and for all age groups. A formal playground, 'St. Catherine's Park' is proposed to the north east of the site and the proposed 'Players Park' includes dedicated play areas. Play is also integrated into the communal amenity spaces that will serve the residents of each proposed building.

Policy SN11 seeks to reserve lands for educational purposes in locations close to the areas of greatest residential expansion. The application area includes land to the north east of the Player Wills site adjacent to St. Catherine's National School that is reserved for its future expansion. Until an application for permission to expand the school is secured by the Department of Education, this area will act as a temporary public park.

The importance of social inclusion for creating sustainable neighbourhoods in regeneration areas and connecting developing areas into the fabric of the city is emphasised. To achieve this, it is necessary to facilitate the needs of all age groups. The importance of the role of supporting culture in new developments is highlighted and its valuable contribution to community vitality and life.

The proposed development recognises this important role of culture and it is proposed to reimagine the former Player Wills factory, a building of industrial architectural merit, to provide dedicated floor space for culture and arts related activities that will support and promote creativity. Accordingly, the proposed development is compliant with Policy SN26 to recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development, and civic engagement.

The urban regeneration proposed in this application for permission would facilitate enhancements for the existing community and support the knitting in of this new community into the wider area. The design is carefully considered, it responds to a critical housing need in a way that improves choice and quality. Connectivity lies at the heart of this proposal as does delivery of supporting community infrastructure through arts and culture, recreation, play and childcare. The locational advantage that this site benefits from would allow people to live closer to places of work. Together all of these elements would safeguard and enhance the sustainable community objectives of the City Development Plan.

## 8 Material Contravention

A separate report is included with this application **Statement of Consistency with National, Regional and Section 28 Guidelines**. It establishes that the proposed development is consistent with relevant policies and objectives.

This report identifies that the proposed development may constitute a material contravention of the height strategy contained within the Dublin City Development Plan 2016-2022. Accordingly, a **Material Contravention Statement** is submitted under separate cover. It concludes that the justification provided for the increased height satisfies the requirements of section 8(1)(a)(iv)(II) and Section 9(6) of the Planning and Development (Housing) and Residential Tenancies Act 2016, demonstrating “*why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000*”.

The delivery of much needed housing as proposed is of national importance and the strategic nature of the proposed development is confirmed having regard to the planning legislation, Strategic Housing Development, under which this application will be processed. This proposal therefore meets the requirements of Section 37(2)(b)(i) of the Planning and Development Act 2000, as amended.

It is considered that there is sufficient justification for An Bord Pleanála to grant permission for the proposed development, notwithstanding any material contravention of the Dublin City Development Plan, by reference to sub-section (ii) and (iii) of Section 37(2)(b) of the 2000 Act, as amended.

## 9 Conclusion

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.

The overarching objective is to create a new and sustainable urban neighbourhood that can aid in securing the regeneration objectives for this site and the wider SDRA 12 lands. The current proposal achieves this by providing opportunities to enhance permeability and connectivity and through a mix of residential and supporting arts, cultural, community and commercial uses that will bring life to the site and surrounding street network. As the balance of lands within SDRA 12 are brought forward for development, this scheme will be fully integrated with the adjoining sites in accordance with the Dublin City Development Plan, benefitting surrounding residents and future occupants.

The proposed development responds to an identified housing need by incorporating a mix of unit sizes that will address the shortfall in housing supply locally and within the wider City. The inclusion of an element of shared accommodation is appropriate having regard to the locational criteria established in the Design Standards for New Apartments Guidelines (2018)

The architectural drawings, considered in conjunction with the Architectural Design Statement, Masterplan and Housing Quality Assessment demonstrate the applicant’s commitment to delivering the highest standards of urban design scheme that will create a vibrant and attractive urban neighbourhood for people to live, work and socialise.

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 established residential setting. The proposed redevelopment of the Player Wills site achieves the principles of proper planning and sustainable development, having regard to;

- i. the site's location within the built-up urban area of Dublin City on lands zoned for residential development under the Dublin City Development Plan 2016-2022;
- ii. the policies and objectives in the Dublin City Development Plan 2016-2022;
- iii. the National Planning Framework 2040 and the Regional Social and Economic Strategy for the Eastern and Midlands Region 2019-2031,
- iv. the Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual – a Best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in May 2009
- v. the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in March 2018,
- vi. the Guidelines for Planning Authorities on Urban Development and Building Height issued by the Department of Housing, Planning and Local Government in December 2018,
- vii. the Guidelines for Planning Authorities on The Planning System and Flood Risk Management (including the associated technical appendices) issued by the Department of the Environment, Heritage and Local Government in November 2009,
- viii. the nature, scale and design of the proposed development;
- ix. the availability in the area of a wide range of social and transport infrastructure; and,
- x. the pattern of existing and permitted development in the area.

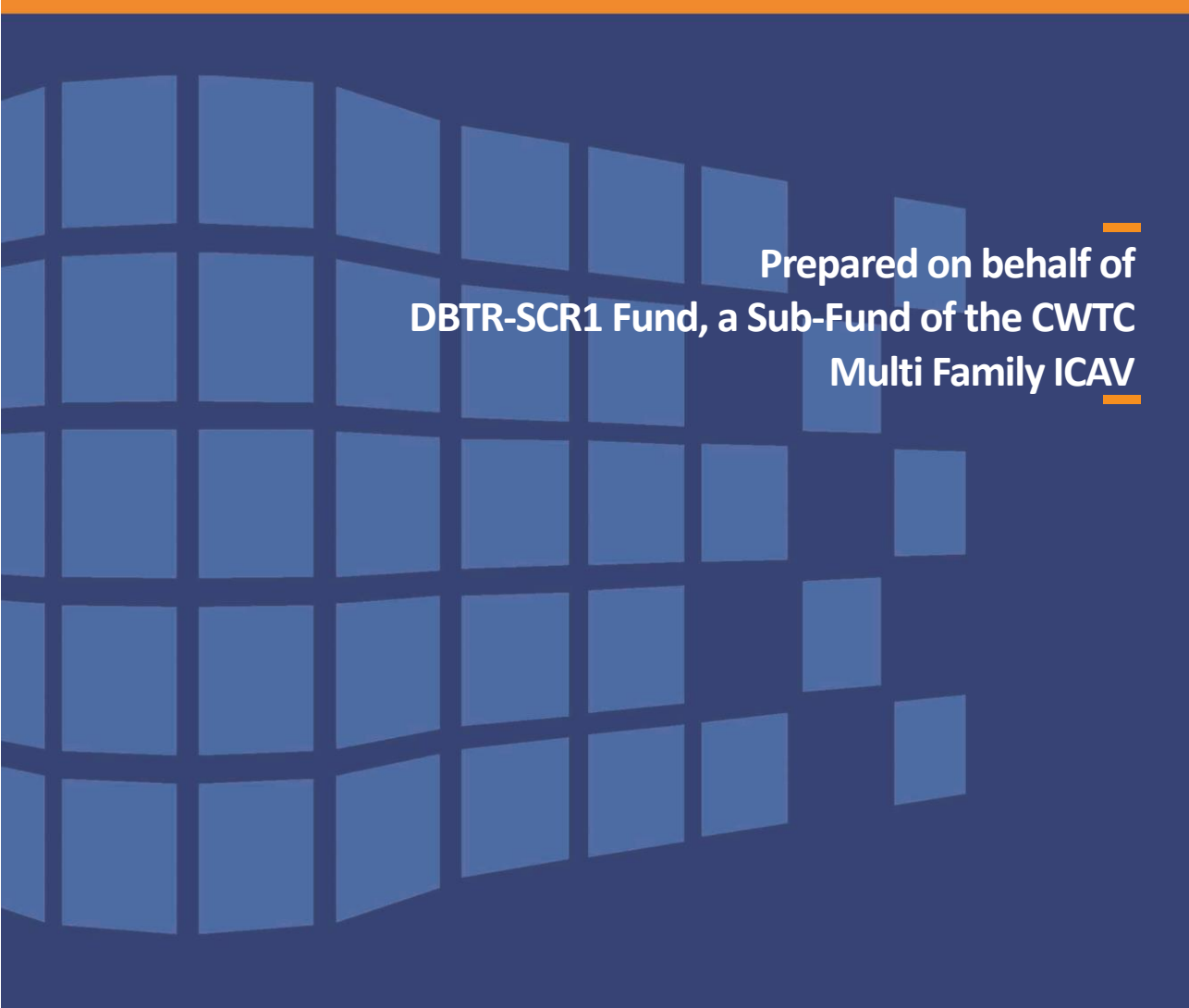
# Appendix 1 – Apartment Unit Mix Justification Report



## Apartment Unit Mix Justification Report

Proposed Strategic Housing Development on the former Player Wills site and undeveloped land owned by Dublin City Council at South Circular Road. Dublin 8.

December 2020



Prepared on behalf of  
DBTR-SCR1 Fund, a Sub-Fund of the CWTC  
Multi Family ICAV

## Document Control Sheet

<b>Client</b>	DBTR-SCR1 Fund, a Sub-Fund of the CTWC MULTI FAMILY ICAV		
<b>Project Title</b>	Proposed Strategic Housing Development on the former Player Wills site and undeveloped land owned by Dublin City Council at South Circular Road, Dublin 8.		
<b>Document Title</b>	Unit Mix Justification Report		
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# 1.Introduction

This report has been prepared by McCutcheon Halley Planning for DBTR-SCR1 Fund, a Sub-Fund of the CTWC MULTI FAMILY ICAV .

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) include a Specific Planning Policy Requirement (SPPR) 7(i) that restrictions on dwelling mix do not apply to Build to Rent (BtR) apartments.

Notwithstanding SPPR 7(i), this report establishes a justification for the proposed mix of BtR apartments. It was considered appropriate to provide a justification for the mix of proposed apartments having regard to the fact that a Housing Need and Demand Assessment (HNDA) has not been published by Dublin City Council and to provide an evidence basis for An Bord Pleanála.

The proposed Strategic Housing Development (SHD) on the former Player Wills site and undeveloped land owned by Dublin City Council at South Circular Road, Dublin 8 is a BtR residential led mixed-use development. It incorporates 492 no. BtR apartment units and the breakdown is as follows.

Building Ref.	Studio	1 Bed Apartment	2 Bed Apartment	3 Bed Apartment	2 Bed Duplex Apartments	3 Bed Triplex Apartments	Total
PW 1	12	23	8	4	-	-	47
PW 2	16	268	92	38	1	-	415
PW 4	-	-	-	-	2	7	9
PW 5	12	1	5	3	-	-	21
<b>Total</b>	<b>40</b>	<b>292</b>	<b>105</b>	<b>45</b>	<b>3</b>	<b>7</b>	<b>492</b>

**TABLE 1 PROPOSED APARTMENT UNIT MIX**

The proposed mix as a percentage of the overall Build to Rent (BtR) apartments is;

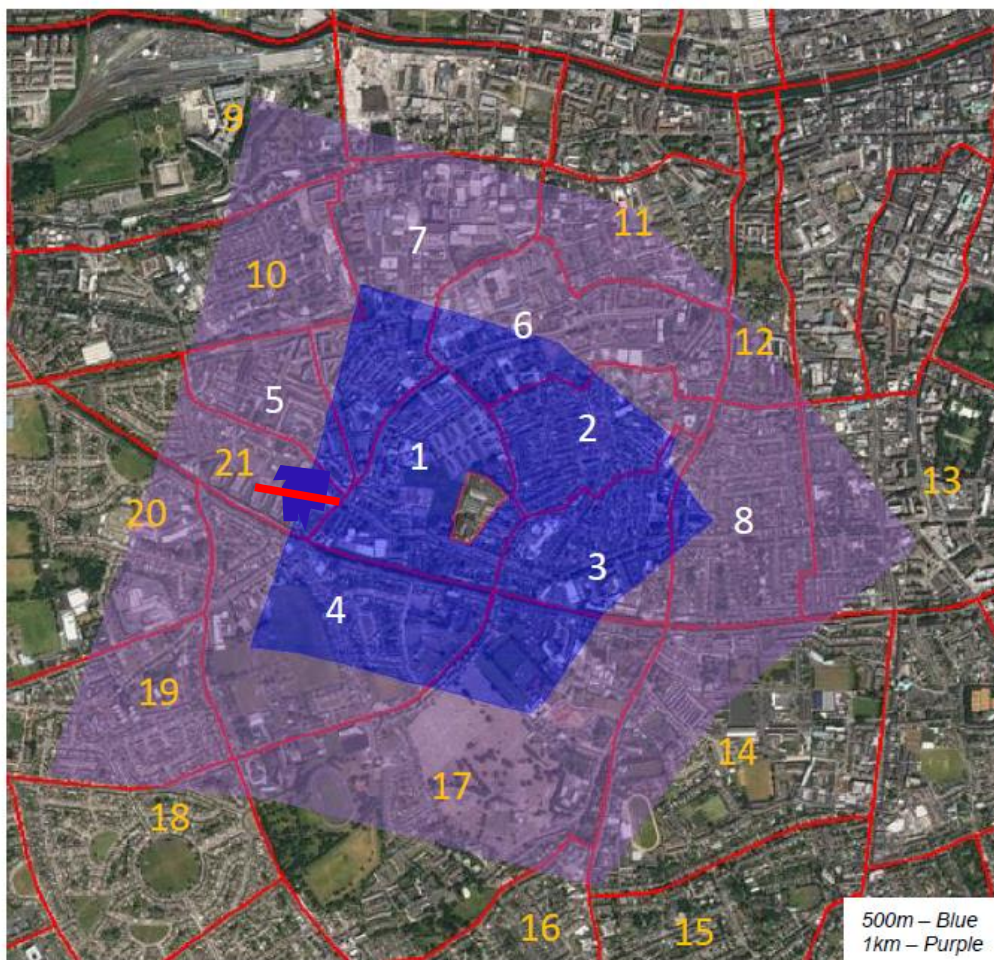
- 40 no. Studios – 8%
- 292 no. 1 Bed Apartments – 59%
- 108 no. 2 Bed Apartments– 22%
- 52 no. 3 Bed Apartments– 10%

## 2 Methodology

The Player Wills site is located within the Merchants Quay F Electoral Division (ED) and data for this ED is reviewed to provide a profile of the area (identified as the 'application area') immediately surrounding the subject site.

Given the urban location of the subject site and its accessibility to public transport, a 1km radius (approximately 15-minute or less walk) was considered appropriate to define the wider 'study area' and so the available data for this area was also examined.

Within the 1km study area, 21 no. Electoral Divisions (EDs) were identified; Merchants Quay B, Merchants Quay C, Merchants Quay D, Merchants Quay E, Merchants Quay F, Ushers A, Ushers C, Ushers D, Ushers E, Ushers F, Crumlin C, Crumlin B, Crumlin D, Kimmage C, Kimmage B, Rathmines West A, Rathmines West F, Wood Quay B, Wood Quay A, Terenure A and St. Kevins, illustrated in **Figure 1**.



**FIGURE 1 PLAYER WILLS STUDY AREA (ED'S WITHIN 1KM)**

Census data for each of these EDs was reviewed to inform this assessment and is compared with National and County (Dublin City) averages across a number of data sets.

This unit mix rationale primarily relies upon a review of data on:

- Population trends
- Population by age cohort
- Households and families
- Existing housing stock
- Existing worker population and commuter flows
- Proximity to significant sources of employment
- Housing delivery
- Recently permitted development in the wider Dublin 8 area

The profile of the study area has also been considered in the context of existing and proposed public transport within the vicinity of the subject site and accessibility to high density employment centres.

## 3 Area Profile

### 3.1 Demographic Profile

The County of Dublin has a population of 1,347,359 (CSO 2016) which has steadily increased by 21% between 1996 and 2016. Dublin City accounts for approximately 41% of the wider Dublin population with a total of 554,544 people. This figure has increased by 9.5% over the past decade.

Based on the CSO's estimates of population growth, Dublin's population grew by 10.6% between 2011 and 2019. Net in-ward migration has played a substantial role in this growth, with a significant proportion of immigrants settling in Dublin for employment purposes. Since 2016, the net national migration figures were 19,800 (2017), 34,000 (2018) and 33,700 (2019).

The latest data published by the CSO in August 2020 indicates that net inward migration was 28,900 persons nationally.<sup>1</sup> Although there has been a recent slight decrease in inward migration which will have been impacted by the COVID-19 pandemic, this figure reflects a sustained high level of inward migration that is significantly greater than the assumed figure of 8,000 per annum (based on 2011 to 2016 census data) which informed the National Planning Framework's (NPF) population projections to 2021. Thus, in reality, the levels of net in-migration have been three to four times greater than forecast over the period to 2020. It is anticipated that Dublin City will continue to be the primary destination for new arrivals to Ireland, being the focal point for internationally mobile investment and high skilled jobs.

The subject site is located within the 'Merchants Quay F' Electoral Division (ED) which had a total population of 2,158 during the last census (2016). The data shows that despite wider growth trends, this ED has been decreasing in population size (by -12.2% in the last 10 years).

**Table 2** below shows the population figures for the Merchants Quay F ED, when compared to the wider study area, the Dublin City administrative area and the State. In total, there were 68,945 people living within the ED's in a 1km radius of the application site in 2016 which represents a 4.47% increase since 2011 and an 8.82% increase since the 2006 census, showing that the study area is experiencing continued strong population growth.

Location	2006	2011	2016	5-year	10-year
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<sup>1</sup> Source: <https://www.cso.ie/en/releasesandpublications/er/pme/populationandmigrationestimatesapril2020/>

<b>Merchants Quay F</b>	2,459	2,405	2,158	-10.3%	-12.2%
<b>Study Area</b>	62,585	65,573	68,945	+5.14%	+10.16%
<b>Dublin City</b>	506,211	527,612	554,544	+5%	+9.5%
<b>Ireland</b>	4,239,848	4,588,252	4,761,865	+3.8%	+12.3%

**TABLE 2 POPULATION TRENDS – LOCAL, COUNTY & NATIONAL**

The sustained population growth in the study area since 2006, is in contrast to the population decline experienced within the Merchants Quay F ED in the same period, alluding to a deficiency in the availability of appropriate accommodation to meet the housing needs of the population in the immediate area. This may be due to a number of factors such as unsuitability of existing housing stock, lack of affordability and insufficient availability of rental accommodation in the immediate area. With the population of Dublin predicted to increase by 31.9% to 1.76 million persons by 2036 (CSO, 2016), there will be sustained pressure for an increase in both the quantum and range of residential accommodation to meet future need.

### 3.2 Age Profile

The majority of the population within the Merchants Quay F ED (application area) is in the Adult (25-64 years) age cohort which makes up 64.5% of the overall population in the area, being 11.5% above the national figure. It is noted that the proportion of the population in the pre-school (0-4 years) cohort is higher than the national average, while older adults (65+ years) account for substantially less than the national average. In addition, the young adult (19-24) cohort is also greater than the national average. These differences highlight that the population in the application area comprising Merchants Quay F ED are home to a younger demographic with a large proportion of working age, see **Table 3**.

<b>Age Cohort</b>	<b>Merchants Quay F ED</b>	<b>% Total</b>	<b>Ireland</b>	<b>% Total</b>
<b>Pre-school (0-4 years)</b>	208	9.6%	331,516	7%
<b>School Age (5-18 years)</b>	203	9.4%	920,281	19%
<b>Young Adults (19-24 years)</b>	227	10.5%	331,208	8%
<b>Adults (25-64 years)</b>	1,391	64.5%	2,541,294	53%
<b>Older Adults (65+ years)</b>	129	6%	637,567	13%
<b>Total</b>	2,158	100%	4,761,865	100%

**TABLE 3 POPULATION BY AGE COHORT**

### 3.3 Households and Families

**Table 4** shows 1-2 person households made up a substantial number of households in the Merchants Quay F ED (69%), substantially higher than the proportion for Dublin City (52%), highlighting the need for suitable accommodation to cater to smaller households in this location. This is consistent with demographic trends which indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons. However, despite the substantial rise in 1-2 person households, only 21% of new dwellings completed since that time contain apartments.

<b>Location</b>	<b>1-2 Person Households</b>	<b>Total Households</b>	<b>% 1-2 Person Households</b>
<b>Merchants Quay F</b>	605	871	69%
<b>Study Area</b>	19,141	29,675	64%
<b>Dublin City</b>	127,639	211,747	60%
<b>Ireland</b>	886,351	1,702,289	52%

**TABLE 4 CENSUS 2016, 1-2 PERSON HOUSEHOLDS**

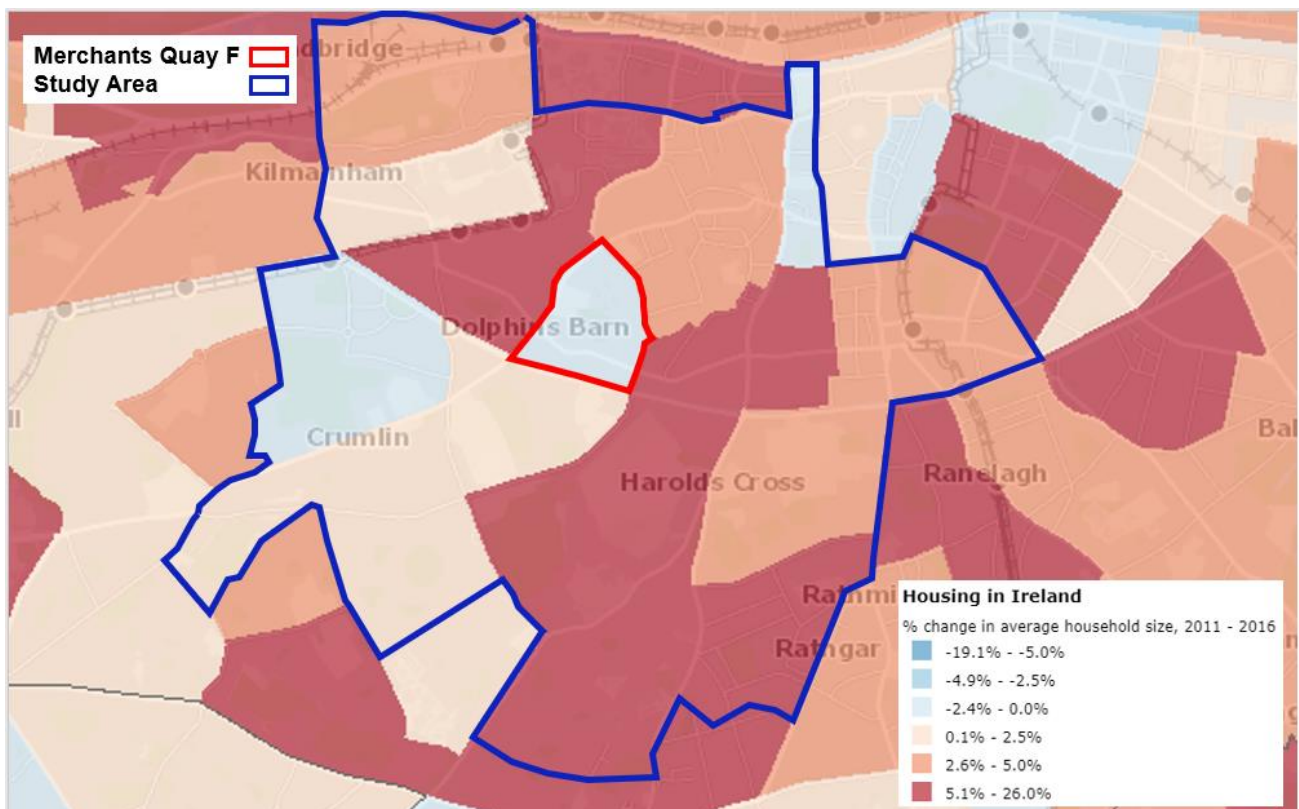
When considered in the surrounding context, it is evident that Merchants Quay F ED has a higher proportion of 1 person households (36%), compared with the study area (32%) and Dublin City (28%), as shown in **Table 5** below.

Location	1 Person Households	% 1 Person Households	2 Person Households	% 2 Person Households
Merchants Quay F	314	36%	291	33%
Study Area	9,858	32%	9,575	32%
Dublin City	60,001	28%	67,707	32%

**TABLE 5 BREAKDOWN OF 1 AND 2 PERSON HOUSEHOLDS (CENSUS 2016)**

Thus the breakdown of households by size in this location reinforces the importance of providing suitable accommodation for smaller households. In 2019, there were 21,241 housing units completed nationally, however, only 3,644 (17%) of these units were apartments.

Following in **Figure 2** is a map showing the percentage change in average household size by ED, for both the application area located in Merchants Quay F ED and the study area between 2011 and 2016. Notably, the Merchants Quay F ED experienced a reduction in average household size, in contrast to the majority of the study area where household sizes increased in the period. However, having regard to the very high proportion of 1-2 person households within the Merchants Quay F ED, and the overall decline in the population between 2006 and 2016, it would be reasonable to conclude that as people have moved away from the family home, they have re-located to other areas outside this Electoral Division.



**FIGURE 2 PERCENTAGE CHANGE IN HOUSEHOLD SIZE BY ED 2011-2016, SOURCE: CSO MAP 2.1**

The 2016 census results also provide data on the number of families where the youngest child is 20 years or more. Following in **Table 6** is the proportion of families in both the Merchants Quay F ED and the 1km study area, where the youngest child in the family is at least 20 years of age.



Location	% Families where youngest child is 20yrs+
Merchants Quay F ED	17%
Study Area	26%

**TABLE 6 FAMILIES WHERE YOUNGEST CHILD IS AGE 20 YEARS OR MORE, CSO 2016**

In addition, following is a breakdown of families by family cycle, based on Census 2016. It classifies family units on the basis that the family nucleus has no children, i.e., pre-family, empty nest and retired or where they have children, that the oldest child is in the age category identified.

**Table 7** includes data for the Merchants Quay F ED which contains the subject site, as well as the Dublin South Central constituency comprising 43 no. ED's in Ballyfermot, Bluebell, Chapelizod, Crumlin, Drimnagh, Dolphin's Barn, Inchicore, Kimmage (parts) and Walkinstown.

As can be seen in **Table 6**, 11.8% of families in the Merchants Quay F ED are made up of families where the oldest child is an adult (20 years or over) and this figure is even greater in the wider area comprising Dublin South Central, being 28%.

Family Cycle		Merchants Quay F ED		Dublin South Central	
		No. Families	% Total	No. Families	% Total
No Children	Pre-Family	142	35.7%	4,874	17.4%
	Empty Nest	31	7.8%	2,303	8.2%
	Retired	18	4.5%	2,156	7.7%
With Children	Pre-School	55	13.8%	3,108	11%
	Early School	42	10.6%	2,867	10.2%
	Pre-Adolescent	35	8.8%	2,419	8.6%
	Adolescent	28	7%	2,780	9.8%
	Adult	47	11.8%	7,848	28%
<b>Total</b>		398	100%	27,985	100%

**TABLE 7 FAMILIES BY FAMILY CYCLE FOR MERCHANTS QUAY F ED & DUBLIN SOUTH CENTRAL, CSO 2016**

Additionally, 48% of families in the Merchants Quay F ED have no children, significantly higher than the surrounding region of Dublin South Central for which the proportion is 33.3%.

The information provided in **Tables 6** and **7** indicates that young adults are living at home for longer, unable to secure appropriate housing due to lack of supply and particularly constrained by the resultant lack of affordability. This corresponds with national data that shows a trend towards more working adults continuing to live in the family home, as follows:

*“The number of adults, aged 18 years and over, who were working and still living at home increased by 19 per cent between 2011 and 2016, increasing from 180,703 to 215,088... Those aged 30 to 34 saw a 26 per cent increase rising from 23,835 to 30,137 over the five years.”<sup>2</sup>*

The Central Bank of Ireland 2019 publication *Population Change and Housing Demand in Ireland*, also highlights this trend, pointing to a declining headship rate as evidence of recent trends that show younger age cohorts are delaying new household formation. The headship rate is the proportion of individuals in an age cohort that list themselves in the census as ‘head of household’ and the Central Bank analysis reveals a reversal of this trend with 2016 data showing the headship rate declining. This shift mirrors the recent increase more widely in persons per household. The report states;

*“...the younger 25-29 and 30-34 age cohorts recorded the largest declines in headship, reversing the upward trend in headship rates for these groups evident up to Census 2011 (see Byrne at al., 2014). The fall in headship in the 2016 Census is consistent with individuals in these younger age cohorts delaying the formation of independent households by remaining in the family home or continuing to live in multi-person households for longer than at the time of Census 2011.”<sup>3</sup>*

The data points to a chronic undersupply of housing and lack of affordable rental accommodation as having a marked impact on the capacity of young people, including working adults to move outside the family home. This trend, which has persisted since the economic downturn is unlikely to be reversed unless a significant increase in housing output is achieved.

### 3.4 Existing Housing Stock

The total housing stock in the study area in 2016 was 33,423 no. dwellings, 1,077no. of which are in the Merchants Quay F Electoral Division. Within the Merchants Quay F ED, 174 no. units were recorded as vacant at the time of the census, possibly due to the age of housing in this area and the need for many homes to be renovated or upgraded so that they are fit for purpose, see **Table 8**.

However, it is noted that the vacancy rate dropped during the intercensal period. The high demand for housing in accessible urban locations and restrictive mortgage lending practices, combined with chronic undersupply of housing generally, has led to substantial inflation in the rental market and likely explains the decreasing vacancy rates across the City, again indicative of the need for new housing stock.

Location	2011			2016		
	Total Stock	Vacant Stock	Vacancy Rate	Total Stock	Vacant Stock	Vacancy Rate
Merchants Quay F	994	213	21.4%	1,077	174	16.2%
Dublin City	241,678	24,638	10.2%	240,063	18,424	7.7%
Ireland	1,994,845	289,451	14.5%	2,003,645	245,460	12.3%

**TABLE 8 HOUSING STOCK AND VACANCY RATES 2011-2016**

New dwelling completions within the Dublin 8 area increased substantially when compared to other locations nearby in South Dublin, with the highest overall numbers in the period shown due to significant increases since 2016, see **Table 9**. It is considered that these new dwelling completions reflect recent higher demand for housing in this accessible urban location.

<sup>2</sup> Source: <https://www.cso.ie/en/releasesandpublications/ep/p-cp4hf/cp4hf/fmls/>

<sup>3</sup> Central Bank of Ireland, Economic Letter, *Population Change and Housing Demand in Ireland*, Thomas Conefrey and David Staunton. Vol. 2019, No. 14.

Location	2014	2015	2016	2017	2018	2019	Total
Dublin 6	51	73	51	134	172	64	545
Dublin 6W	14	35	58	50	80	219	456
Dublin 8	30	34	84	114	178	259	699
Dublin 10	2	1	3	24	122	19	171
Dublin 12	39	8	44	116	96	175	478

TABLE 9 NEW DWELLING COMPLETIONS BY EIRCODE AND YEAR

**Table 10** identifies permanent housing located within the Merchants Quay F ED and wider study area by year built. It shows that the greatest proportion of housing stock (36.5%) within the application area was constructed prior to 1919, compared with 21.5% in the study area.

Housing Stock	Merchants Quay F ED	Study Area
Pre 1919	36.5%	21.5%
1919-1960	16%	31%
1961-1980	5.3%	6.4%
1981-2000	6%	14.2%
Post 2000	22%	12.6%

**TABLE 10 PERMANENT PRIVATE HOUSEHOLDS BY YEAR BUILT (2016)**

Following in **Table 11** is a breakdown by type of accommodation available in the application area of Merchants Quay F ED. The House / Bungalow typology make up more than half of the total housing stock (53%), followed by Flats / Apartments (40%). Within the study area, the figures are similar being 54% and 43% respectively. Given the age of the housing stock outlined above, it can reasonably be assumed that the majority of the respondents are living in houses converted to flats, that would not benefit from the high quality standards of new build apartments.

Accommodation Type	Merchants Quay F ED	Study Area
	% Total	% Total
House / Bungalow	53%	54%
Flat / Apartment	40%	43%
Other / Not Stated	7%	3%

**TABLE 11 PRIVATE HOUSEHOLDS BY TYPE OF ACCOMMODATION, MERCHANTS QUAY F ED (2016)**

Whilst there is a sustained demand for new homes and greater housing mix, the shortfall in supply is well documented. The NPF states that between 2018 and 2040, an average annual output of at least 25,000 new homes will be needed nationally. Other research suggests that the level of new housing required is much greater. In its 2019 report, the Central Bank of Ireland examines the most up-to-date population projections from the CSO and estimates scenarios for long-run housing demand in Ireland, advising that around 34,000 homes would be required per year until the end of the next decade. The report concludes;

*“In all scenarios we examine, estimated housing demand is higher than the number of new residential units completed over recent years, implying a need for continued expansion in housing supply over the medium-term.”<sup>4</sup>*

Although the data reveals a significant increase in new dwelling completions since 2014, including for the Dublin 8 area, the disparity between supply and demand remains, with the number of new homes falling short of the required level of output.

The data also suggests that the proportion of apartments remains well below that of traditional housing types. For example, in 2017 apartments accounted for 15% of the 14,407 no. new dwelling completions. In 2018, only 13% of the 18,072 no. new homes built were apartments. In 2019, apartments accounted for 17% of all new dwellings.

The 21,241 no. new homes completed in the country in 2019 was the highest level in a decade, but despite this growth, the number of new dwellings remains below the required level and further, only 35% (7,555 no.)

<sup>4</sup> ibid.

of these units were in Dublin. The output for 2020 is predicted to be 25% lower than 2019 owing to the Covid-19 pandemic, assuming that the rate of delivery in Dublin is similar to the previous year, just 5,600 new homes would be delivered.

A 2020 AIB report, examined the mismatch between demand and new housing supply in the Dublin context reporting;

*“Essentially, population and housing demand have sharply outpaced the growth in the housing stock in Dublin from 2011 to 2019, but the disparity outside of Dublin has not been as pronounced. Based on Central Statistics Office (CSO) estimates of population growth, Dublin’s population grew by 10.6 per cent between 2011 and 2019, whereas the housing stock grew by only 4.9 per cent.”<sup>5</sup>*

### 3.5 Housing Tenure

The All Island Research Observatory Dublin Housing Observatory (DHO) Mapping Viewer provides a breakdown of households by type of occupancy based on 2016 census data.

Across Dublin City, 51% of the housing stock is owner occupied and 42% is rented either through private landlords or from a public body. In Merchants Quay F ED, owner occupancy is 28.7% and this rises to 35.3% in the small area (268103009) within which the proposed development site is located.

In Merchants Quay F ED, the percentage of Private Rented households in 2016 was 47.1% and this decreased slightly to 44.4% in the small area (268103009) within which the proposed development site is located.

In 2016, across the Dublin region’s 4 no. local authorities, the age group that represents the largest proportion of private renters are 30-34 year olds (24%), followed by 25-29 year olds (20%). Notably, the largest change in terms of movement into private renting between 2011 and 2016, are the 35-39 year age cohort (+23% change) and 40-44 year age group (+22%).

This trend is consistent with the delayed age of household purchase and means that the future rental market will need to provide greater certainty, increased quality and better security, to cater to the growing number of households that are renting and elect to rent for longer periods and until later in the household cycle. Thus, there is likely to be a continued strong demand for rental accommodation in this accessible location close to Dublin.

With national government support, the BtR sector has emerged as a new format of residential accommodation that has the potential to respond to the growing pressure on the rental market, by increasingly supply and providing security in this form of tenure.

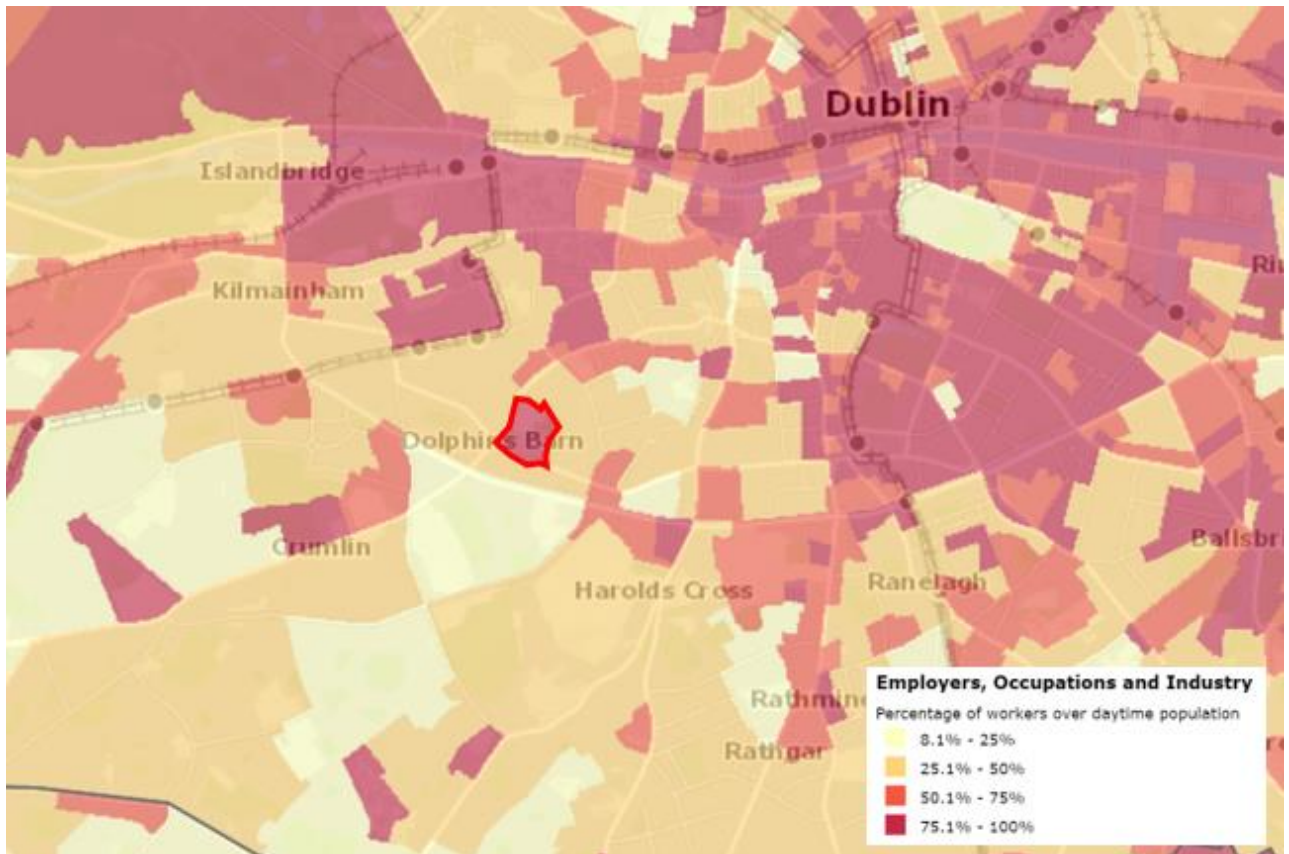
The BTR model can deliver more housing units to the market quickly and at a greater scale than that of the traditional model. There is also a greater market for higher density apartment living in Dublin, compared to other parts of the country.

### 3.6 Employment Opportunities

The 2016 CSO boundary set ‘Workplace Zones’ (WPZ’s) identifies the percentage of persons at work over the daytime population. **Figure 3** shows WPZ’s mapped in the vicinity of the subject site.

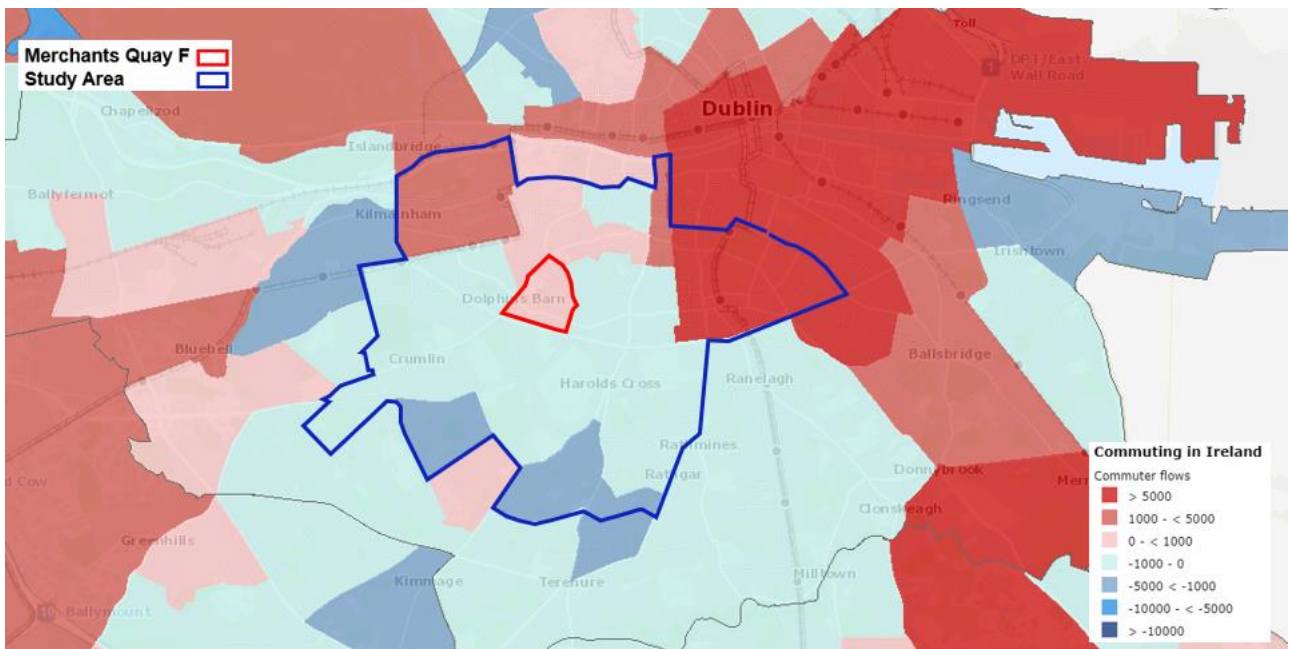
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<sup>5</sup> AIB Real Estate Finance, *The Irish Housing Market – ‘Are we there yet?’*, Pat O’Sullivan and Rory McGuckin, February 2020



**FIGURE 3 PERCENTAGE OF WORKERS OVER DAYTIME POPULATION, CSO 2016**

It is evident from **Figure 3** that the area immediately surrounding the subject site attracts a significant number of workers reflecting the close proximity of employment opportunities. The data shows that in 2016 there was an estimated daytime population of 1,041 persons in this workplace zone and 924 persons at work. The Coombe Women’s Hospital is likely to account for a significant proportion of the workers in this location.



**FIGURE 4 COMMUTER FLOWS (INWARD COMMUTERS LESS OUTWARD) BY ED, CSO 2016**

**Figure 4** maps commuter flows (inward commuters less outward) by Electoral Division based on Census 2016 data. It indicates that the application area of Merchants Quay F ED is attracting more persons than are

travelling outside the area for the purposes of employment and education. The boundary of the study area is also shown in **Figure 4**, highlighting that there are a large number of persons travelling to areas in the north and east for the purposes of work and education.

The number of persons at work shown in **Figure 3**, coupled with the mapping of commuter flows in **Figure 4** corresponds with the concentration of jobs in nearby employment centres. The Coombe Hospital, St James's Hospital and the Royal Victoria Eye and Ear Hospital are all located within ED's in the study area. Hospitals are identified under the 2018 Apartment Guidelines as significant employment locations and will impact on demand for housing in the locality.

The **Traffic and Transport Assessment** prepared by SYSTRA and submitted under separate cover, further highlights the scale of employment opportunities in the vicinity of the Player Wills site. It indicates that there are over 72,000 jobs within a 30-minute walk.

In addition, the TTA highlights the number of jobs within a 30 minute cycle of the subject site;

*"The city centre, TUD Grangegorman, Coombe and St James's Hospitals and Heuston Station are all within a 15-minute cycle of the site. There are an estimated 148,050 jobs within a 15-minute cycle of the site and over 340,000 within a 30-minute cycle."*

The substantial scale of employment generated in Dublin city centre and the Docklands is reflected in **Figure 4** by the significant commuter flows to these locations, to the north-east of the study area. The strong employment environment within close proximity to the application site, has fuelled growth in the Irish economy and population growth. Dublin ranks third in Europe as a tech destination and fifth for FDI jobs created by 'start-ups' from 2015-2019.<sup>6</sup>

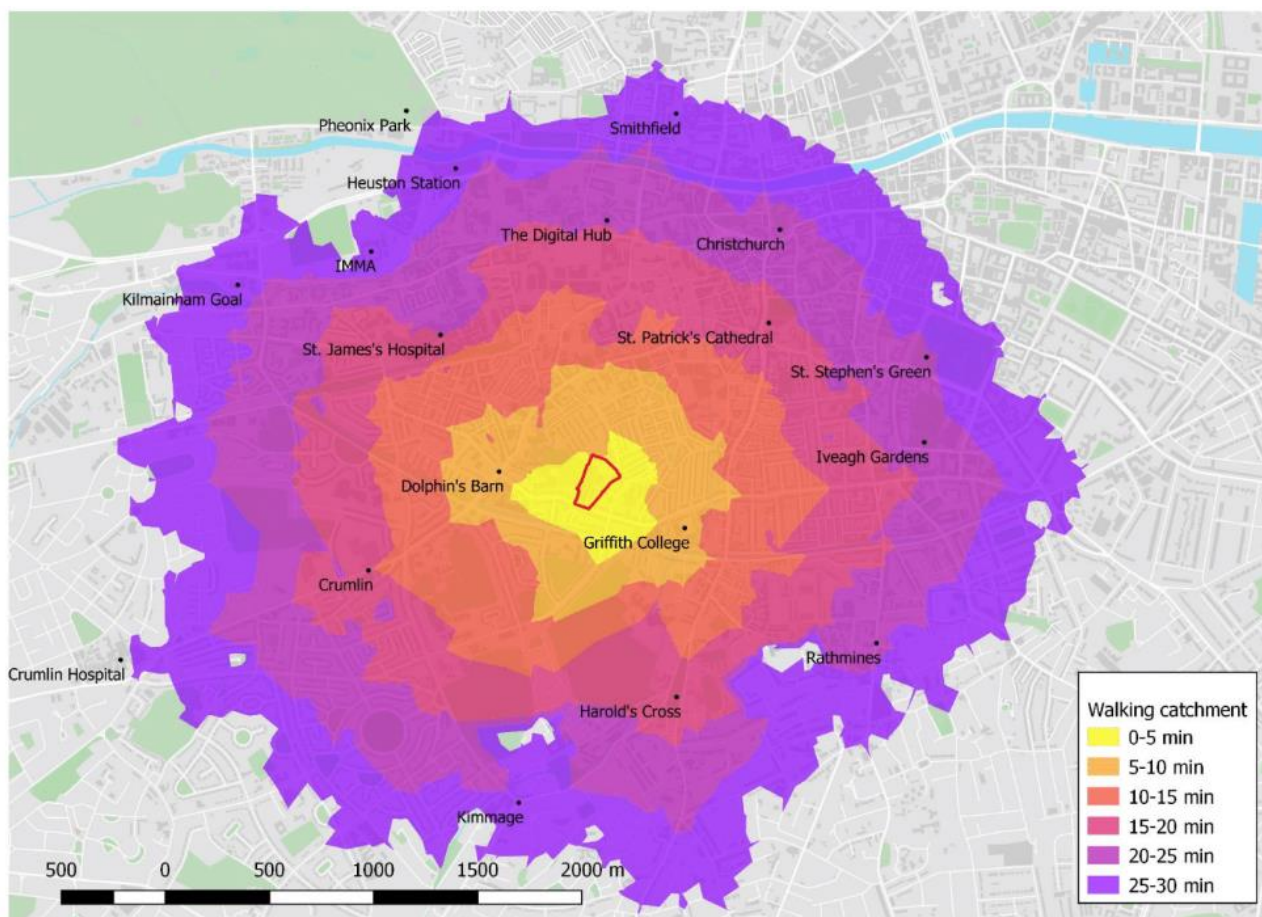
The growth in the tech sector is one of the main factors in Dublin's growth. The Dublin Docklands has emerged as the Irish Silicon Docks, being home to multi-national companies such as Google, Facebook and Indeed. Other companies including Salesforce, Mastercard and Microsoft have recently taken up office accommodation in Dublin.

Brexit has also had a positive effect on the Dublin office market, with over 80 no. companies (including JP Morgan, Bank of America and DLA Piper) having announced plans to move to or expand within Dublin since the Brexit vote in 2016.<sup>7</sup>

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<sup>6</sup> fDix TNW *Tech Cities of the Future*, 2020/21.

<sup>7</sup> BNP *Real Estate Guide to Investing in Dublin*, 2020



**FIGURE 5 CYCLING CATCHMENT FOR PLAYER WILLS SITE (SOURCE: SYSTRA TTA)**

**Figure 5** above maps the cycling catchment (up to 30 minutes) for the subject site, highlighting the accessibility of the application site to key employment destinations.

It is noted however, that recent commentary by CEO's of multi-national corporations in Dublin City Centre, and beyond, have pointed to a key difficulty with staff retention as a direct result of a lack of affordable accommodation. In August 2018, Paul Hackett, CEO of Click and Go has placed an additional spotlight on this issue citing an issue with recruiting staff outside of Ireland as '*they simply cannot find, or afford, suitable rental accommodation*' in Dublin. If staff can't find affordable accommodation, within close proximity to their place of work, the attractiveness of the employment offer diminishes, significantly. The delivery of affordable rental accommodation in the form of a new build to rent accommodation type is clearly required.

### 3.7 Existing and Proposed Public Transport

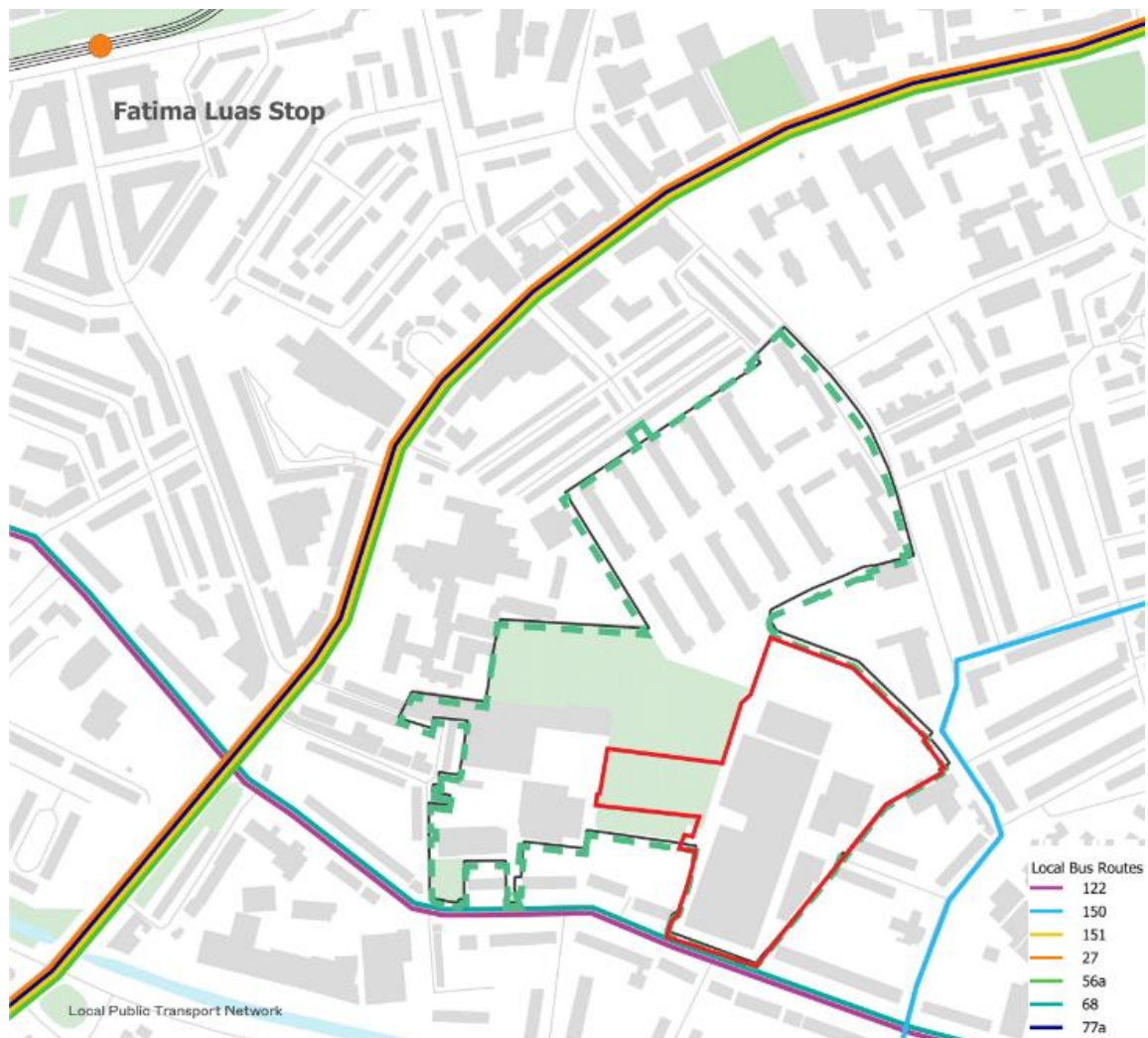
The subject site is well connected in terms of road and public transport links, see **Figure 6**. Fatima LUAS stop is c.800m north-west of the site (walk time less than 10 minutes), while South Clondalkin QBC connecting the site with the city centre and south-western suburbs of Dublin extends along Cork Street and Dolphin's Barn Street and is situated c.200m to the west (2-4 minute walk).

The locality is well served by Dublin Bus, with the nearest bus stops being c.45m from the site on the northern side of South Circular Road and c.64m away on the southern side of South Circular Road. These bus stops provide the subject site with connections to the city centre, Ashington in north Dublin, Drimnagh to the south-west and Greenogue Business Park to the west.

Additional high frequency bus services are also available along the nearby QBC at Dolphin's Barn Street / Cork Street, where the nearest bus stops are located c.385m and c.435m away on the eastern and western



sides of the QBC respectively. These bus stops are served by routes 17 and 17D (Rialto to Blackrock station), 27 (Jobstown to Clare Hall), 56A (Tallaght to Ringsend Road), 77A and 77X (Citywest to Ringsend Road) and 151 (Foxborough to Docklands), connecting the subject site with Dublin city centre and the greater Dublin metropolitan area. In addition, the site is a 44-minute walk and 16-minute cycle to Dublin city centre, therefore suiting the needs of all commuters.



**FIGURE 6 EXISTING PUBLIC TRANSPORT SERVICES**

In addition to the high level of connectivity provided by existing high capacity and high frequency public transport services, future infrastructural improvements are planned under the BusConnects programme. There are a total of 16 core bus corridors which are proposed to be developed over 3 phases. Greenhills-City Centre Corridor which runs along Dolphin's Barn Street is planned to be developed in phase 2 of the project. The preliminary design for these corridors is currently being progressed by National Transport Authority.

The Greenhills-City Centre Corridor is classified as a very high frequency spine with frequencies of 2.7 to 3.7 minutes proposed along Dolphin's Barn Street / Cork Street. In addition, a new orbital route is planned along the South Circular Road which will pass directly in front of the proposed development and this route will operate at a frequency of 5-10 minutes.

### 3.8 Strategic Development Regeneration Area 12

The proposed development site forms part of a wider Strategic Development and Regeneration Area (SDRA) 12 – St Teresa’s Gardens. A SHD for the Bailey Gibson site was permitted by An Bord Pleanála on 14<sup>th</sup> September 2020 (Case Ref. PL29S.307221).

The permitted SHD comprises 416 no. BtR residential units, including 4 no. houses and 412 no. apartments, together with 164 sq.m of commercial floor space and a childcare facility of 233 sq.m. The total number and mix of residential units within the Bailey Gibson development is as follows;

- 19 no. studio apartments (5%)
- 251 no. 1 bedroom apartments (60%)
- 136 no. 2 bedroom units including 134 no. apartments and 2 no. duplex apartments (33%)
- 6 no. 3 bedroom triplex apartments (1%)
- 4 no. 4 bedroom townhouses (1%)

A Development Framework for St. Teresa’s Gardens and Environs was published by Dublin City Council in 2017. The purpose of the Development Framework is to translate the requirements and principles of the current City Development Plan on the Planning and Development of the SDRA 12 lands. Following the Bailey Gibson site and Player Wills site coming into single ownership, a Masterplan was prepared by Dublin City Council in conjunction with the Applicant to address national and regional policy changes, to ensure the delivery of the objectives for SDRA12 in the Dublin City Development Plan and to make refinements to land uses as necessary.

The Masterplan provides a framework for an integrated approach to the redevelopment of this strategically located urban block and aims to secure physical, social and economic regeneration of the area. The Masterplan is cognisant of national planning and development policy which requires such strategically located sites to be developed in an efficient and effective manner to optimise their development potential with regard to scarce urban land and the need to increase housing supply.

The housing mix within the approved Bailey Gibson development was informed by the overarching objective to create a sustainable new residential-led development that responds to the housing demands of the local community and workforce by incorporating a range of unit sizes to address the shortfall in housing supply and meet the identified needs of Dublin City. Further, the Bailey Gibson development responds directly to the significant market demand within the private rental sector in this highly accessible urban location.

In deciding to grant permission to the Bailey Gibson SHD, the Board determined that the proposal is of strategic and national importance with the *“potential to contribute to the achievement of the Government’s policy to increase delivery of housing from its current under supply set out in Rebuilding Ireland – Action Plan for Housing an Homelessness”* and further noted *“that the site has excellent existing public transport accessibility to high frequency bus services and good access to the wider network including rail links.”*

### 3.9 Affordability

The Daft.ie Rental Price Report<sup>8</sup> highlights that the most acute shortages of housing in Ireland are for housing in or close to the main cities, and for smaller households (of one- to two-persons). Rent pressure is a direct result of supply deficit. While availability of rental properties has increased in Dublin over the last year arising

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<sup>8</sup> An analysis of recent trends in the Irish rental market 2020 Q3

from the Covid-19 pandemic which has resulted in a downward pressure on rents, this is a finite resource and should not be considered a solution to the supply problem.

When Dublin's rental premium in Q3 2020 is compared to the four other cities it has only fallen from 60% pre-COVID-19 to 50% in the latest Daft report.

Significant to this report is the finding that Covid-19 has not impacted smaller homes. Daft highlight that *“compared to a three-bed with five other students, or a four-bed with three other young professionals, a one-bedroom apartment sounds distinctly more sanitary – as do purpose-built student and co-living blocks. The data in this report seem to back this up, with the discount for a one-bedroom apartment falling slowly but steadily from 35% pre-Covid to 32% in the latest report.”*

While Dublin has witnessed a reduction in rents over the past year, the average price has fallen just 2.3% from €2,083 per month in Q3 2019 to €2,035 in Q3 2020.

Looking at Dublin 8, the location of the proposed development site, the decrease over the same period is 2% for a 1-bedroom unit from €1,730 to €1,696. It should be noted that between 2018 and 2019, the monthly rent had increased by 6.5%.

A key affordability indicator or crisis occurs when a person is required to spend more than 30% of their salary on rent. Taking these figures, and using a net salary multiplier, an annual salary of €61,000 would be required to service monthly rental repayments for a 1-bed unit in this area. This is well in excess of the national average salary which currently stands at approximately €45,000. Using these statistics alone there are no affordable accommodation options in this area for the average single income family or single persons seeking standard tenancies.

Notably within Dublin 8 the largest decrease in monthly rent between Q3 2019 and Q3 2020 was for 3-bedroom units (4.8%) and 2-bedroom units (3.5%). This is indicative of smaller household formations but also perhaps a desire to live separate from grouped rental households.

The Central Bank's Loan to Income (LTI) requirements are a binding constraint on young professionals. The combination of the cost of starter homes and the LTI restrictions on residential mortgage lending to the typical first time-buyer has caused an affordability wedge that is driving demand for a greater choice of affordable high-quality rental accommodation.

Greater competition for a finite supply of urban housing has led to higher prices, which has made traditional options unaffordable for many cohorts, particularly younger occupants. This affects both for-sale and rental stock, creating what has been widely accepted as an affordability crisis.

The housing output in Dublin is far off reaching equilibrium in demand/supply balance in the medium term. Unaffordability is leading to more young professionals living at home with parents for longer or moving back home after university. Cost effective city centre housing solutions such as this proposed shared accommodation scheme are required urgently to create a bridge for young adults wanting to leave home and pursue their career in the city.

## 4 Conclusion

Key statistics from the assessment of the area profile has informed the proposed mix of apartment units. They include;

- i. The existing housing stock in the ED and the study area is predominantly house/bungalow. It can be reasonably concluded that they contain 2 and more bedrooms.
- ii. Apartments/flats account for approx. 40% of the existing housing profile and given the vintage of the housing stock, it can reasonably be concluded that the majority are houses converted to flats that may have suboptimal living conditions.
- iii. Across the City, owner occupied homes is the predominant tenure.
- iv. Across the City, study area and ED at least 60% of households comprise 1-2 persons and more homes are required for this smaller household formation.
- v. Affordable homes for modest income earners are required.
- vi. Birth rates are continuing to fall since 2009 and the City has one of the lowest young dependency ratios (0-14 year olds) in the State, at 27.9%.
- vii. There is a high concentration of work opportunities proximate to the site, particularly health related employers.
- viii. The site is highly accessible by public transport to the wider city area for employment opportunities.

Combined, these factors highlight that there is a pressing need for a high-quality rental offering in this area, that responds to smaller household formations while also providing for accommodation suitable for families, to allow opportunities for people to continue to live in rented accommodation close to the city centre. This change could greatly increase the affordable housing supply.

Accordingly, the greatest concentration in mix is studio and 1-bedroom apartments, 67%, with the balance incorporating 2-bedroom plus homes.