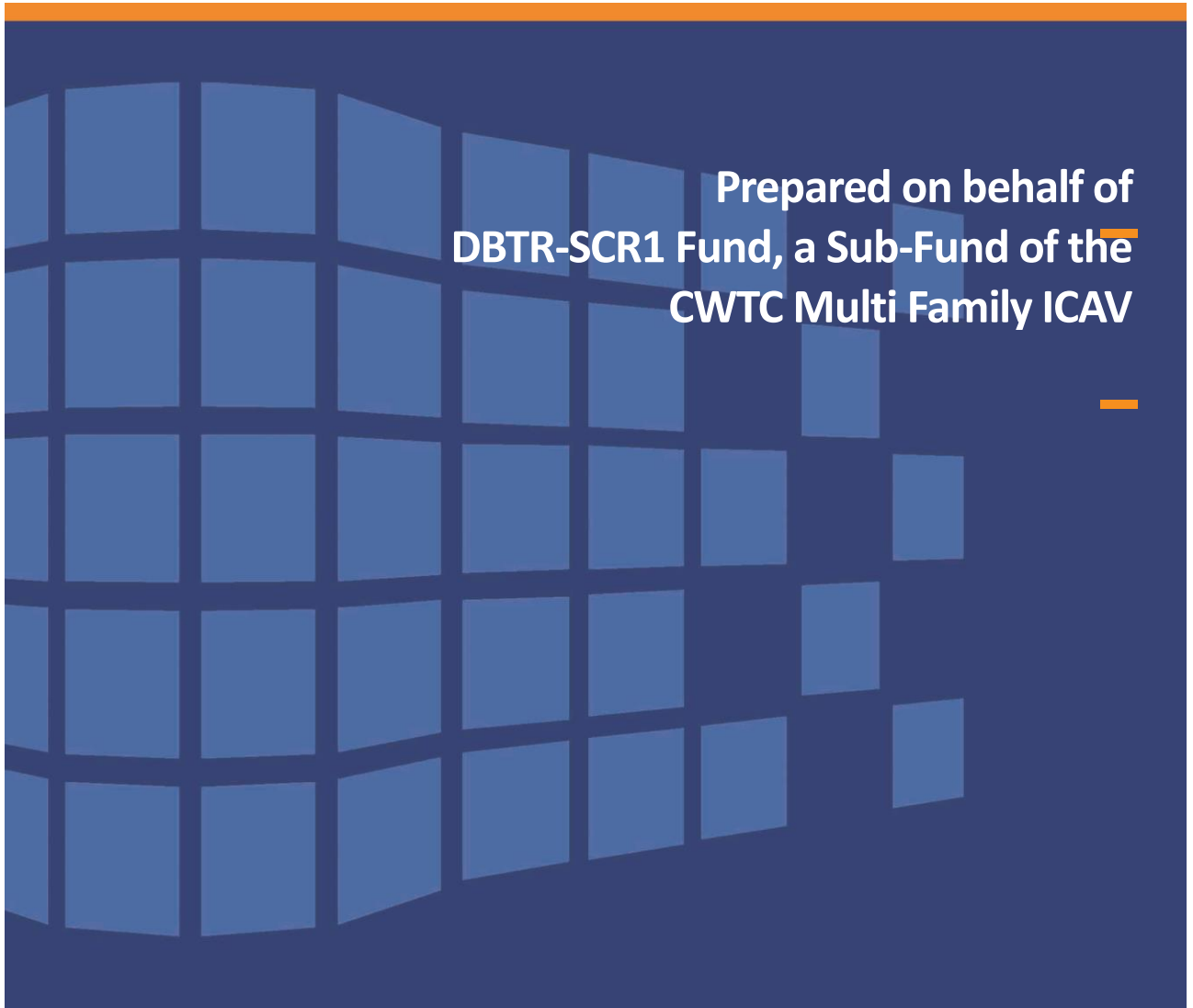


Statement of Consistency with National, Regional & S.28 Ministerial Guidelines

Proposed Strategic Housing Development at the Former Player Wills Factory
Site, South Circular Road, Dublin 8

December 2020



Document Control Sheet

Client	DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV		
Project Title	Proposed Strategic Housing Development on the former Player Wills site and undeveloped land owned by Dublin City Council at South Circular Road, Dublin 8.		
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Table of Contents

1. Introduction	4
1.1 Purpose of Statement of Consistency	5
2 Description of Development	6
3 National Planning Policy & Section 28 Guidelines	10
3.1 Project Ireland 2040: National Planning Framework (2018)	10
3.2 Sustainable Urban Housing: Design Standards for New Apartments (2018)	22
3.3 Urban Development and Building Heights: Guidelines for Planning Authorities (2018).....	25
3.4 Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)	32
3.5 Design Manual for Urban Roads and Streets (2013).....	33
3.6 Sustainable Residential Development in Urban Areas (2009)	37
3.7 Urban Design Manual – A Best Practice Guide (2009)	41
3.8 Childcare Facilities Guidelines for Planning Authorities (2001).....	52
3.9 Architectural Heritage Protection - Guidelines for Planning Authorities (2011)..	52
4 Regional Planning Policy	53
4.1 Eastern & Midland Regional Spatial & Economic Strategy 2019-2031	54
5 Conclusion	58

Table of Figures

Figure 1 Application Area.....	5
Figure 2 Site Layout Plan.....	9

1 Introduction

This Statement of Consistency (SoC) has been prepared by McCutcheon Halley Chartered Planning Consultants in collaboration with the appointed Design Team on behalf of the Applicant, DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV.

The Applicant is seeking permission for a Strategic Housing Development (SHD) by way of an application to An Bord Pleanála (ABP) in compliance with Section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016, for a proposed residential led Build To Rent (BTR) and Shared Accommodation scheme together with tenant amenities and commercial development at the former Player Wills site, South Circular Road, Dublin 8.

The Applicant has carried out consultation with the Planning Authority under Section 247 of the Planning and Development Act 2000-2016. A pre-application consultation meeting was also held with ABP under Section 6(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 on 15th July 2020.

The proposed development meets the threshold for SHD, being a development of 100 or more units on land zoned for residential use, and accordingly is subject to the provisions of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The proposed development will involve the demolition of all existing structures on site with an exception of the façade of the original Player Wills Factory Building (15,454 sq.m) and construction of 240 no. Shared Accommodation private living areas and 492 no. BTR residential units comprising 483 no. apartments, 2 no. 2-bedroom duplex apartments and 7 no. 3-bedroom triplex apartments across 4 no. blocks, ranging in height from 2 to 19 storeys, with tenant amenities including a gymnasium, co-working area, Cultural/Community Hub and entertainment areas; a crèche (275 sq.m) and retail/retail services/food and beverage uses (1,837 sq.m) at ground floor level.

The subject site forms part of a non-statutory Masterplan prepared by Dublin City Council which is derived from the area's designation as a Strategic Development and Regeneration Area (SDRA) 12 in the Dublin City Development Plan 2016-2022. **Figure 1** below shows the location of the application area within the Masterplan site.

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

Together with the Planning Statement, it is concluded that the proposed development contravenes the 50m maximum building height as included in the Dublin City Council Development Plan 2016-2022, but nonetheless, the development is consistent with National, Regional and Local Planning Policy and relevant S.28 Ministerial Guidelines. It is our belief that because the development seeks to further the objectives of the foregoing policies, that the proposed development is justified in deviating from the Dublin City Development Plan with regard to height.



FIGURE 1 APPLICATION AREA

1.1 Purpose of Statement of Consistency

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

The following plans were considered relevant to the proposed development:

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

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

2 Description of Development

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.

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

Building Ref.	Shared Accommodation	Studio	1 Bed Apartment	2 Bed Apartment	3 Bed Apartment	2 Bed Duplex Apartments	3 Bed Triplex Apartments	Total
PW 1	240	12	23	8	4	-	-	287
PW 2	-	16	268	93	38	-	-	415
PW 4	-	-	-	-	-	2	7	9
PW 5	-	12	1	5	3	-	-	21
Total	240	40	292	106	45	2	7	732

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

- Studios – 8%
- 1 Bed Apartments – 59%
- 2 Bed Apartments– 22%
- 3 Bed Apartments– 10%

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 resulting in the site facilitating openness, ease of access and interconnectivity. To preserve the public realm, parking is predominantly located at basement level. Given the accessible location of the site, the ratio of carparking is 0.3 spaces per 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.

Vehicular access to the development will be via Donore Avenue, exit for vehicular traffic on to the South Circular Road will be via the existing access east of the Player Wills factory building.

A comprehensive landscape scheme that 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. Throughout the scheme a clear hierarchy of attractive and usable open spaces are created that respond to the needs of the residents. 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. Communal amenity space is located within residential courtyards and roof terraces (3,671 sq.m combined) with play and amenities such as BBQ and yoga lawns provided for. Public open space is distributed as a series of plazas and pocket spaces.

Foul water will discharge to the combined sewer within Donore Avenue at the north east corner of the application 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 –10.521/s.

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

As part of the overall integrated Masterplan Drainage Strategy agreed with Dublin City Council's Drainage Planning Department, it is proposed to construct a dedicated storm water sewer (approx. 388m in length), to connect into the existing municipal storm water drainage network within Donore Avenue at the north east corner of the site. Discharge rates, including 20% increase in flows due to climate change, will be as follows: 1Year ARI – 1.1/s, 30Year ARI 10.8/s, 100Year ARI 21.7/s.

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

In terms of services, it is proposed to construct ESB substations to serve the development and back-up will be provided via a standby generator. Gas will be supplied via an existing main gas line located on South Circular Road.

Waste management facilities are proposed at basement and ground level. 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. All bulk waste bins shall be brought from the communal bin storage areas to the designated bin collection areas, 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.

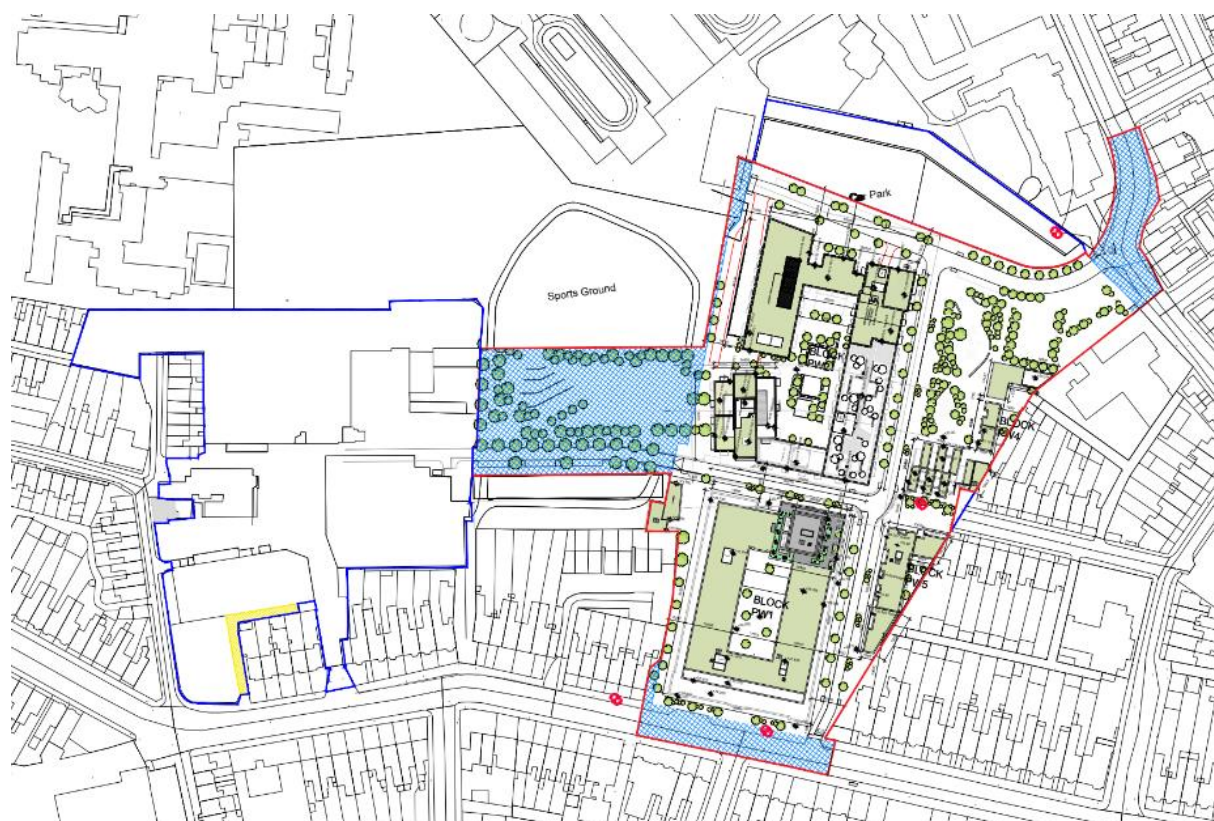


FIGURE 2 – SITE LAYOUT PLAN

3 National Planning Policy & Section 28 Guidelines

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

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

3.1 Project Ireland 2040: National Planning Framework (2018)

Policy Objective	Policy Provision	Statement of Consistency
2a	A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.	✓ The proposed development is located within one of the five cities, being within the inner suburbs of Dublin City.
3a	Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements.	✓ The proposed development is located on a brownfield inner suburban site, and so is in accordance with Objective 3a.
3b	Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.	✓ The proposed development will deliver 732 new homes inclusive of the proposed 240 Shared Living bedspaces on a brownfield inner suburban site, and so is in accordance with Objective 3b.
4	Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.	<p>✓ The proposed development will create a high-quality residential development which integrates with the existing established residential community in the vicinity of Dolphin's Barn and South Circular Road.</p> <p>✓ The proposed development has been designed to respond to the wider regeneration objectives for St Teresa's Gardens, ensuring the creation of an integrated and attractive new quarter that delivers improvements to the site's</p>

Policy Objective	Policy Provision	Statement of Consistency
		<p>permeability and enhances the public realm.</p> <ul style="list-style-type: none"> ✓ The proposed development provides a mix of units, types and scale. ✓ The proposed development will provide a series of communal open spaces and landscape greening that will create a high-quality urban development and enhance residential amenity at the site. ✓ The proposed development will meet the needs of workers in Dublin City and suburbs where currently there is an undersupply of rental accommodation. ✓ The proposed development is accompanied by a Masterplan, Architectural and Landscape Design Statement, Daylight, Sunlight & Overshadowing study and Traffic Impact Assessment which demonstrate the quality of the buildings and residential environment being created. ✓ The proposed development will include the provision of on-site childcare facilities in the form of a creche which will serve the future occupants of the development and the greater surrounding area. ✓ The proposed development includes the provision of a Cultural Hub including Artist's Studio's, a Culture/ Community Space, Sculptural Garden and a Performance Space, within the PW1 building which will both serve the proposed development and surrounding community. ✓ A number of retail, food & beverage and a co-working units are to be located at ground floor of the PW1 and PW2 buildings which will

Policy Objective	Policy Provision	Statement of Consistency
		<p>activate the ground floors which in turn will increase public surveillance within the development.</p> <ul style="list-style-type: none"> ✓ The proposed development includes the provision of 2 no. public parks (5,310sq.m) which will further ensure that future occupants will have a high-quality of life. Moreover, a third temporary park (1,158sq.m) will also be provided until such time as the school extension is built.
5	Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.	<ul style="list-style-type: none"> ✓ The proposed development will add to the densification of Dublin's inner suburbs and maximise utilisation of public transport. ✓ The addition of appropriate new residential units including Apartments and Shared Living units to the available stock of rental accommodation will enhance the international competitiveness of Dublin City, ensuring continued FDI and attracting foreign workers.
6	Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.	<ul style="list-style-type: none"> ✓ The proposed development will commence the process of creating a new urban quarter at the Masterplan lands. ✓ It will realise regeneration of a brownfield site that is currently under-utilised and detracts from the amenity of surrounding residential development. ✓ The redevelopment of this brownfield site will improve connections and permeability through these lands to the adjoining City Council public open space in the north and east, Coombe Hospital through the Bailey Gibson site west of the application site and St Catherine's National School and Donore Avenue to the east.

Policy Objective	Policy Provision	Statement of Consistency
		<ul style="list-style-type: none"> ✓ The insertion of a high-density residential scheme will rejuvenate the area bringing a level of activity that is currently absent.
7	<p>Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on inter alia:</p> <ul style="list-style-type: none"> • Dublin • Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; • Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes; • In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth. 	<ul style="list-style-type: none"> ✓ The proposed development is located on an inner-suburban brownfield site proximate to centres of employment. ✓ The site's zoning facilitates high density residential development. ✓ The redevelopment of this site will contribute to the realisation of regeneration objectives for these lands. ✓ The proposed development is located in close proximity to high capacity LUAS services and high frequency urban bus services and will help to reduce car dependence in Dublin City. ✓ The proposed development includes Apartments and Shared Living units which are located in close proximity to Dublin City and public transport links thus reducing the need for future unplanned growth of commuter settlements.
8	<p>To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out for Dublin of an increase in population of approximately 20-25% (or 235,000 - 293,000 people) by 2040.</p>	<ul style="list-style-type: none"> ✓ The proposed development will provide high density residential development that will facilitate an increase in the population of Dublin City.
11	<p>In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</p>	<ul style="list-style-type: none"> ✓ This proposal seeks permission for a net density of 321 units/ha on a brownfield site which is located at a central accessible location that is close to major employment centres and high capacity / high frequency public transport services. ✓ The development includes 1,837 sq.m of retail/food & beverage development which in

Policy Objective	Policy Provision	Statement of Consistency
		<p>turn will generate a number of additional jobs for residents in and around the development.</p> <ul style="list-style-type: none"> ✓ The additional population will lead to strengthening of jobs and economic activity within the area through the knock-on effect on services and facilities within the existing urban area and therefore satisfies objective 11.
13	<p>In urban areas, planning and related standards, including building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.</p>	<ul style="list-style-type: none"> ✓ The proposed development ranges in height from 2 storeys to 19 storeys. The proposed heights are consistent with emerging trends for development in central and accessible locations in Dublin and is consistent with national policy objectives of compact growth and increased densification in appropriate urban locations. ✓ The application is supported by a comprehensive suite of supporting documents assessing the development against performance-based criteria. ✓ The Landscape and Visual Impact Assessment as included in the EIAR concludes that the effects are assessed as positive since (a) they are supported by policy, and (b) the proposal exhibits an understanding of and appropriate response to the sensitivities and opportunities presented by the urban context. No further mitigation measures other than those incorporated in the design are proposed. ✓ In terms of access to sunlight, the analysis demonstrates at least half all of the amenity areas (excluding the PW1 courtyard) in the development will receive more than 2 hours of sunlight on March 21st in accordance with the Building Research Establishment (BRE) recommendations.

Policy Objective	Policy Provision	Statement of Consistency
		<ul style="list-style-type: none"> ✓ Average daylight analysis indicates that 92% of rooms tested within the proposed scheme will achieve projected Average Daylight Factors (ADF), above the recommendations in the BRE Guidelines. This number across the scheme would be expected to increase further if all of the upper rooms were included in the results. ✓ There is minimal overshadowing from the proposed Player Wills development due to the considered architecture along the eastern side (close to St. Catherine's Avenue) where the potential for overshadowing to existing buildings is greatest. This would be categorised as a minor adverse impact under the BRE recommendations. ✓ The benefits of developing this brownfield site are wide-ranging and the type and form of development is consistent with emerging trends to ensure consolidation of the urban footprint and efficient use of land and is in the interest of the common good. ✓ The proposed level of car parking provision is at a rate of 0.3 spaces per unit, commensurate with the site's proximity to Dublin City and accessibility to high capacity and high frequency public transport services.
17	Enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive use now and for future generations.	<ul style="list-style-type: none"> ✓ The proposed development includes the retention of the original Player Wills factory building which is considered to integrate and protect this heritage asset located on South Circular Road.
26	Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though integrating	<ul style="list-style-type: none"> ✓ The site is within a central urban location and is accessible to a wide range of

Policy Objective	Policy Provision	Statement of Consistency
	such policies, where appropriate and at the applicable scale, with planning policy.	<p>employment opportunities in the city centre and surrounding suburbs, including the adjacent Coombe Hospital and St James's Hospital 15 minutes' walk away. Approximately 930 people will be accommodated at the site and will benefit from being within walking distance of public transport, local retail and recreational facilities and employment opportunities.</p> <ul style="list-style-type: none"> ✓ A gymnasium is included within the proposed development to encourage future occupants to live active lifestyles. ✓ 903 no. long-stay secure cycle parking spaces are provided for future occupants.
27	Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.	<ul style="list-style-type: none"> ✓ The proposed development is located at a central urban site that enjoys high levels of connectivity and will generate increased pedestrian and cycling activity. The result will be safer streets and open areas with increased passive surveillance providing a deterrent to anti-social behaviour. ✓ 903 no. long stay cycle spaces are to be provided within the development promoting active modes of travel. ✓ A Mobility Management Plan accompanies this submission and it is proposed to appoint a Mobility Manager will be appointed to ensure ongoing promotion and marketing of sustainable travel options to the residents of the development. ✓ The preparation of the Welcome Travel Pack will provide encouragement to residents to consider their travel choices. ✓ 20 no. car parking spaces are reserved for car sharing and a

Policy Objective	Policy Provision	Statement of Consistency
		<p>letter of intent from Go Car is included.</p> <ul style="list-style-type: none"> ✓ Permeability is central to the design and in this regard, it is proposed to create 3 no. pedestrian access points to the site, including 2 no. from the South Circular Road and 1 no. from St. Catherine's Avenue.
28	<p>Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.</p>	<ul style="list-style-type: none"> ✓ The proposed development provides for studios, 1 bed, 2 bed and 3 bed units and single-occupancy Shared Living units, that will cater for a range of household sizes. ✓ The Applicant will comply with their Part V obligations and deliver 49 no. social housing units. ✓ Communal open space is to be incorporated into the development in the form of semi-private courtyards for each block and 2 no. public parks which will enhance residential amenity and provide opportunities for social integration. ✓ The scheme incorporates residential support amenities together with neighbourhood level retail uses creche facilities and a Cultural/Community Hub. ✓ The proposed Apartments are Part M compliant, including a number of the Shared Living units, and thus includes access for people with disabilities.
31	<p>Prioritise the alignment of targeted and planned population and employment growth with investment in:</p> <ul style="list-style-type: none"> • The provision of early childhood care and education (ECCE) facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations. 	<ul style="list-style-type: none"> ✓ The Social Infrastructure Audit that accompanies this submission concludes that there are sufficient local educational facilities in the form of primary, post-primary and third level establishments to meet the needs of the additional population generated by the proposed development.

Policy Objective	Policy Provision	Statement of Consistency
		<ul style="list-style-type: none"> ✓ Land on the Player Wills site is reserved for the future expansion of St Catherine's National School as part of the Masterplan. ✓ This application is accompanied by a Childcare Assessment, it concludes that there is currently under provision of childcare facilities within a 1km zone of influence. The proposed development incorporates a childcare facility with a gross floor area of 275 sq.m and will thus provide for the maximum childcare needs generated by the scheme as well as providing a service for the wider catchment.
32	Target the delivery of 550,000 additional households up to 2040.	<ul style="list-style-type: none"> ✓ The proposed development will contribute 492 no. new households to the target exclusive of the 240 no. single-occupancy Shared Accommodation private living areas.
33	Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.	<ul style="list-style-type: none"> ✓ The proposed development provides 492 no. homes and 240 Shared Accommodation private living areas on a centrally located brownfield site in close proximity to the city centre and benefitting from accessibility to high capacity and high frequency public transport services.
34	Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	<ul style="list-style-type: none"> ✓ There is a deficit in accommodation suitable for smaller households in the local area and this scheme will respond to that need. Please refer to Appendix 1 of the Planning Statement and Statement of Consistency with Dublin City Development Plan 2016-2022 – Apartment Unit Mix Justification report submitted under separate cover for further details.

Policy Objective	Policy Provision	Statement of Consistency
		<ul style="list-style-type: none"> ✓ This type of accommodation is particularly suited to adaptation at a later stage because it will be owned and operated by a single institutional entity. Thus, there will be an opportunity for adaptation or amalgamation of units, to respond to the changing needs of the market. ✓ 240 no. Single-occupancy Shared Accommodation private living areas are provided for within the site, which aim to cater for young professionals. ✓ The proposed development is designed with a Universal Design Approach i.e. so that it can be readily accessed and used by everyone, regardless of age, size, ability or disability. ✓ The proposed development is Part M compliant.
35	Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.	<ul style="list-style-type: none"> ✓ The proposed development is designed to maximise density and height, making the most efficient use of this brownfield urban site, public transport investment and utilisation, and increase the proportion of people living in apartment type accommodation.
52	The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.	<ul style="list-style-type: none"> ✓ The proposed development is designed to a BREEAM Excellent rating which is only given to development which reach a very high level of energy efficiency. ✓ This submission is accompanied by an Environmental Report that demonstrates overall post-mitigation the residual impact of the proposed development is not significant. ✓ Irish Water has confirmed the feasibility of the scheme in terms of potable water supply and foul water discharge.

Policy Objective	Policy Provision	Statement of Consistency
		<ul style="list-style-type: none"> ✓ The landscape design incorporates SuDS and biodiversity measures.
54	<p>Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.</p>	<ul style="list-style-type: none"> ✓ The proposed development is designed to a BREEAM rating of Excellent meaning that the buildings will have a very high energy performance. ✓ The drainage system includes an allowance for climate change and SuDS in the form of green roofs, blue roofs, petrol interceptors, attenuation and flow controls are integrated into the design. ✓ The proposed development has been planned to promote active modes of travel and reduce car dependence. A Mobility Management Plan accompanies this submission.
56	<p>Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.</p>	<ul style="list-style-type: none"> ✓ During the demolition & construction stage, every opportunity to minimise waste production including reuse and recycling of materials will be embraced. This matter is addressed further in the accompanying Construction & Demolition Waste Management Plan. ✓ The proposed development will incorporate adequately sized waste management facilities within the basement that will promote source segregation of waste streams i.e. organics, recyclable and residual waste. ✓ The proposed development is designed to a BREEAM rating of Excellent meaning that the buildings will have a very high energy performance.
57	<p>Enhance water quality and resource management by:</p> <p>Ensuring flood risk management informs place-making by avoiding inappropriate</p>	<ul style="list-style-type: none"> ✓ A site-specific flood risk assessment has been undertaken, full details are provided in the accompanying

Policy Objective	Policy Provision	Statement of Consistency
	development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.	<p>BMCE Civil Engineering Infrastructure Report.</p> <ul style="list-style-type: none"> ✓ The site is located in Flood Zone C and therefore the proposed development is appropriate and in accordance with Guidelines on this matter. ✓ The proposed development will not cause flooding at the subject site and will not affect the flood storage volume or increase flood risk elsewhere.
60	Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.	<ul style="list-style-type: none"> ✓ The original Player Wills factory building is to be retained as part of the proposed development, and this building will be converted into Build to Rent apartments and single-occupancy Shared Accommodation private living areas, therefore conserving the industrial heritage in this part of Dublin.
63	Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.	<ul style="list-style-type: none"> ✓ Sustainable urban drainage system (SuDS) measures are incorporated as appropriate into the proposed design.
64	Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.	<ul style="list-style-type: none"> ✓ Given the site's accessible location, a reduced level of car parking provision for residents is proposed. This will serve to promote a modal shift in transport and a reduction in emissions. ✓ A total of 903 no. cycle parking spaces are provided within the scheme. ✓ The proposed development is designed to have a BREEAM rating of excellent and will achieve a high level of energy efficiency through minimising the use of fossil fuels and associated emissions to air.

Policy Objective	Policy Provision	Statement of Consistency
75	Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	<ul style="list-style-type: none"> ✓ An Environmental Impact Assessment Report and Appropriate Assessment Report accompany this application. ✓ The AA Screening concludes that the proposed development will not impact identified Designated Sites either alone or in-combination with other plans or projects.

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

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard, it is considered that the proposed development falls within (1) Central and/or Accessible Urban Locations as it meets the criteria;

- Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m) of significant employment opportunities, including hospitals. The Player Wills site is situated adjacent to the Coombe Hospital and within 15 minutes' walk of St James's Hospital.
- Sites within reasonable distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops, including light rail. Fatima LUAS stop is 800m to the north-west, less than 10 minutes' walk from the site.
- 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. The South Clondalkin QBC extending along Cork Street and Dolphin's Barn Street is situated c.200m to the west (2-4 minute walk).

This is a Build to Rent and Shared Living proposal and the scheme is designed with full regard to the apartment design parameters in the Guidelines including, inter alia, unit mix, size, internal space standards, dual-aspect ratios and amenity spaces. The **Housing Quality Audit** presented in the Architectural and Landscape Design Statement provides a comprehensive assessment of the scheme's compliance with the quantitative standards established in the Apartment Guidelines.

Being a BtR and Shared Living scheme, the provisions of SPPR 1 regarding unit mix are not applicable.

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

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

Table 5a sets out the minimum standards for Shared Living units:

Single (including ensuite) – 12 sq.m

Double/twin (including ensuite) – 18 sq.m

The minimum floor areas have been met within all individual units and the majority of the units exceed the minimum floor area as is illustrated in the **Housing Quality Audit** submitted under a separate cover. The requirement for the majority of all apartments to exceed the minimum floor area by a minimum of 10% does not apply to BTR or Shared Living schemes under SPPR 8 (iv).

SPPR 4 requires that a minimum of 33% of dual aspect units is required in central and accessible urban locations. The scheme achieves 51% dual aspect.

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

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

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

In relation to Private Amenity Space it is a requirement to provide apartments with private open space in the form of gardens and patios and balconies. In Build-to-Rent schemes, SPPR 8(ii) states that there is flexibility in the approach to the proportion and provision of private amenity space. The proposed scheme incorporates a series of communal open spaces for each of the 4 no. apartment blocks (PW1, PW2, PW4 and PW5). These areas have been designed to provide resident amenity spaces that will provide opportunities for recreation and social integration and enhance biodiversity. The orientation of the communal open spaces within the courtyards of the respective blocks is intended to optimise access to sunlight.

The proposed streetscape and public realm have been designed to provide a high degree of amenity, connectivity and encourage activity by pedestrians and cyclists. The internal network of roads will connect to the existing street system at the South Circular Road and St. Catherine's Avenue provide future connections to the north and west of the SDRA 12 lands. These internal streets have been designed as shared spaces that will prioritise pedestrian movement, enhancing the level of resident amenity within the development.

Based on the Apartment Guidelines, the 4 no. apartment blocks within the proposed development will generate a requirement for 2,604sq.m communal amenity space. Each of the 4 no. apartment blocks within the scheme will benefit from access to separate communal open spaces.

Regarding security, the Guidelines require that occupants and visitors should benefit from a sense of safety and security by overlooking of the public realm. All communal open spaces and public realm areas are designed to be overlooked at ground level and from above to ensure that they function as safe and secure areas for the enjoyment of residents. Each of the residential blocks will have independent access from the active ground level streets to maximise opportunities for passive surveillance. Residential lobbies, together with own-door unit entrances will create a streetscape that is both appropriately scaled and animated. The perimeter block layout will ensure that public and private spaces are clearly defined and will have a clear purpose.

Refuse storage provision is a requirement of the Guidelines in apartment schemes and must be accessible to each stair core and designed with regard to the projected waste generation, types and quantities. Within apartments there must be sufficient provision for temporary storage of segregated

materials prior to deposition in communal facilities. As outlined above, the scheme provides adequate storage within individual apartments in excess of that required for BTR schemes and communal waste storage is provided at basement level.

Children's play, the Guidelines require that play needs are incorporated into apartment developments. The communal open spaces will provide informal play areas. All areas for play are overlooked to ensure that the safety of children is prioritised.

Bicycle parking & storage, the Guidelines provide a general minimum standard of 1 cycle storage space per bedroom and visitor parking at a standard of 1 space per 2 residential units. A ratio of 1.3 cycle spaces per unit will be provided which is above DCC standards (1 per unit) for the Build to Rent apartments. This ratio is below DHPLG guidance (1.38 per unit based on the number of proposed bedrooms). However, the target cycle mode share for development is 15% which based on an estimated future population of approximately 937 equates to a need for 140 bikes for commuting purposes. It is recognised that additional spaces will be needed for bike storage and leisure use thus 903 long stay spaces have been provided. The provision of cycle parking will continue to be reviewed as part of the Mobility Management Plan and the potential provision of additional cycle parking will be reviewed should the demand arise.

With respect to car parking, the default policy detailed in SPPR 8(iii) is that car parking provision should be minimised, substantially reduced or wholly eliminated in certain circumstances, in central and/or accessible locations that are well served by public transport. Based on the site's location, availability of alternative modes, proposed on-site mobility services, baseline levels of existing car ownership, the BTR nature of the developments and national and international guidance, a parking ratio of 0.3 car spaces per unit is proposed for the development. As part of the mobility management measures aimed at encouraging and facilitating sustainable travel, increased levels of cycle parking will be provided. A ratio of 1.3 cycle spaces per unit will be provided which is compliant with the DCC standards (1 per unit).

Though it is the objective of the parking and mobility strategy to limit the need for car usage of residents and visitors alike, an additional 37 car spaces (incl. 3 no. disability space) will be provided on street to ensure adequate parking is provided for visitors and negate any overspill onto the surrounding street. The total number of visitor spaces has been maximised whilst maintaining a quality public realm. This parking will be paid 'pay and display' car parking.

SPPR 7(b) requires applications to be accompanied by detailed proposals for supporting communal and recreational amenities, the facilities are categorised as (i) Resident Support Facilities and (ii) Resident Services & Amenities. 3,096 sq.m of tenant amenity facilities incorporating a gymnasium, co-working space and entertainment areas as well dedicated tenant amenities and facilities for the Shared Living units are proposed. The accompanying Architectural and Landscape Design Statement should be referenced for full details. Centralised waste management is at basement level. Laundry services are not included as there is sufficient area within individual apartments to accommodate this.

SPPR 8 (iii) states that '*Flexibility shall be applied in relation to the provision of all storage and amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities. 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;*' A total of 3,321 sq.m of communal open space and 2 no. public parks (5,115 sq.m) are being provided for as part of this development, which are considered to adequately serve both the proposed apartments and the Shared Accommodation private living areas.

SPPR 9 states that within Shared Accommodation '*Flexibility shall be applied in relation to the provision of all storage and amenity space as set out in Appendix 1, on the basis of the provision of alternative,*

compensatory communal support facilities and amenities. 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'. The proposed development has been designed to a very high-standard, and amply tenant amenities and communal open spaces are provided to meet the need of future occupants to the proposed develop. A Cultural/ Community Hub, Café, Games Rooms ad Lounges. A Communal Courtyard is also located within the PW1 building which will act as a covered outdoor performance space.

The Guidelines highlight that Part V requirements are applicable to BTR schemes, and accordingly 49 no. social housing units are proposed. See Part V proposal included under separate cover.

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

These Guidelines reinforce that “a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels”.

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

SPPR 1 states;

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

The Dublin City Development Plan 2016-2022 identifies Strategic Development and Regeneration Area (SDRA) 12 – St Teresa’s Gardens as an appropriate location for one or two mid-rise buildings up to 50m. Within the proposed development, there are two taller towers in the PW2 building, one fifteen storey (49.7m) and the other nineteen storeys (62.5m) which exceed the maximum standards. This material contravention to the City Development Plan is addressed in the accompanying Planning Statement submitted with this application. For the purposes of this section, the height of the proposed development is considered with regard to the qualitative performance criteria identified in the Guidelines.

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

1	<p>Does the proposal positively assist in securing National Planning Framework objectives of focussing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres.</p>	<p>✓ The site is currently vacant and activating it for the delivery of a high-density residential scheme and achieving effective consolidation is consistent with the National Policy Objectives of the NPF to achieve a targeted pattern of growth, specifically; NPO 3a - <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;</i> and NPO 3b - <i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i></p>
2	<p>Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?</p>	<p>✓ The proposed development includes buildings ranging in height from 3-19 storeys. The site is situated within SDRA 12 – St Teresa’s Gardens, identified in the City Development Plan as an appropriate location for one or two mid-rise buildings up to 50m and the proposal exceeds this height limitation in 2 no. blocks.</p> <p>✓ While the Dublin Development Plan 2016-2022 has not taken clear account of the requirements set out in chapter 2, the current development proposal has evolved in response to the Masterplan prepared by Dublin City Council. This is consistent with Section 2.11 of the Guidelines which identifies urban brownfield sites greater than 2ha as appropriate locations for a cluster of higher buildings subject to a master-planning exercise to address “<i>movement, public realm, design and other issues that are best addressed at a neighbourhood level</i>”.</p>
3	<p>Where the relevant development plan, local area plan or planning scheme pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?</p>	<p>✓ The numerical limitations on building height identified within the City Development Plan do not align with the objectives and policies of the National Planning Framework which aim to not only facilitate but actively seek out significant increases in building heights and overall density of development in appropriate urban locations.</p>

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

<p>City/Town</p>	<ul style="list-style-type: none"> • Public transport • Integration with and enhancement of area – Landscape & Visual Assessment (LVIA) • Positive contribution to place-making 	<ul style="list-style-type: none"> ✓ The site benefits from high levels of accessibility to public transport including high capacity LUAS services and high frequency Dublin Bus services. ✓ An LVIA together with a suite of photomontages accompanies this submission. Post development, the impact is predicted to range from not significant to very significant positive. ✓ The development will fill a large gap in the existing townscape, reducing the disconnection between the surrounding areas, and establishing a new urban quarter with a distinct identity. In so doing it would enhance all of the surrounding areas which have been identified as needing rejuvenation, through changes to views (introducing a new and attractive built element to the view compositions, indicating a new place of significance in the townscape).
<p>District/ Neighbourhood/ Street</p>	<ul style="list-style-type: none"> • Responds to overall natural and built environment • Enhances urban design context • Cognisant of flood risk • Improvements to legibility • Positively contribute to mix of uses & dwelling types 	<ul style="list-style-type: none"> ✓ The proposed development will bring a brownfield, vacant site into productive use and will regenerate this area of the city through the introduction of a vibrant urban quarter that will improve the public realm and permeability and provide for a Cultural and Community Hub which will serve both future occupants and the surrounding population. ✓ A Site-Specific Flood Risk Assessment is included under separate cover and concludes that in line with the justification test the

		<p>proposed development is acceptable.</p> <ul style="list-style-type: none"> ✓ A key element of the layout is permeability which will benefit the wider community through the creation of new pedestrian accessways, including two pedestrian accesses at South Circular Road and another at St. Catherine's Avenue which will also provide connections to the adjoining public open space and Donore Avenue to the east. ✓ The proposed development is for a mix of apartments sizes and Shared Living units which have been informed by expert advice that demonstrates that the proposed typology will augment the existing housing stock. ✓ The retention of the original Player Wills Factory building, and the inclusion of a Cultural and Community Hub within building PW1 responds to the sites location and overall and enhances its urban design context by providing an active ground floor uses.
<p>District/ Neighbourhood/ Street</p>	<ul style="list-style-type: none"> • Maximise access to daylight, ventilation & views and minimise overshadowing & loss of light. 	<ul style="list-style-type: none"> ✓ A Daylight assessment accompanies this application under separate cover and demonstrates that 92% of the tested rooms in the proposed scheme are projected to have an Average Daylight Factors (ADF) above the recommended Average Daylight Factors (ADF) from the BRE guidelines. ✓ The Shadow analysis shows that overall, there is minimal overshadowing from the proposed Player Wills development due to the considered architecture along the west side (along Rehoboth Place/Avenue) where the potential for

		<p>overshadowing to existing buildings is greatest. This would be categorised as a minor adverse impact under the BRE Guidelines.</p> <ul style="list-style-type: none"> ✓ On the 21st of March, all of the amenity areas provided for the Player Wills site would receive at least 2 hours of sunlight exceeding the BRE recommendations with the exception of the original Player Wills Factory courtyard. ✓ A Site-Specific Flood Risk Assessment is included under separate cover and concludes that the proposed development is acceptable being located in Flood Zone C.
<p>Specific Assessments</p>	<ul style="list-style-type: none"> • Micro-climatic effects • Birds/Bats • Telecommunications • Safe Air Navigation • Urban Design Statement • EIA • AA 	<ul style="list-style-type: none"> ✓ A micro-climatic assessment will accompany this application for permission. ✓ An Environmental Impact Assessment Report and LVIA is submitted under separate cover and concludes that post mitigation the proposed development will not give rise to likely significant environmental effects. ✓ A Masterplan and Architectural and Landscape Design Statement are included with this submission. ✓ The AA Screening concludes on the best scientific evidence that it can be clearly demonstrated that no elements of the project will result in any likely significant impact on any relevant European site, either on their own or in combination with other plans or projects, in light of their conservation objectives.

SPPR 3 states;

“It is a specific planning policy requirement that where;

A;

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

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

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

This application is accompanied by a suite of supporting information that fulfil the obligations of the Applicant for the development management process. The reports demonstrate that the proposed development is appropriate and will not give rise to significant impacts and complies with the guidelines on Build to Rent and Shared Accommodation as included in the Apartment Guidelines (2018).

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

In relation to BtR and Shared Accommodation development, the following Specific Planning Policy Requirements apply:

SPPR 7 states;

BTR development must be:

- *Described in the public notices associated with a planning application specifically as a ‘Build-To-Rent’ housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;*
- *Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:*
 - (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.*

The proposed development meets the criteria for a Build to Rent Development as listed above.

SPPR 8 states;

For proposals that qualify as specific BTR development in accordance with SPPR 7;

- *No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*

- *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;*
- *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 requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
- *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.*

SPPR 9 states;

“Shared Accommodation may be provided and shall be subject to the requirements of SPPR 7 (as per BTR). In addition;

- *No restrictions on dwelling mix shall apply;*
- *The overall unit, floor area and bedroom floorspace requirements of Appendix 1 of these Guidelines shall not apply and are replaced by Tables 5a and 5b;*
- *-Flexibility shall be applied in relation to the provision of all storage and amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities. 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;*
- *A default policy of minimal car parking provision shall apply on the basis of shared accommodation development being more suitable for central locations and/or proximity to public transport services.*

The requirement for shared accommodation to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.

The Specific Planning Policy Requirements (SPPR's) as listed above have been considered by the Architects in the overall design of the proposed development. All standards have been met or exceeded within the proposed development as is demonstrated in the **Housing Quality Audit**, and on this basis, it is considered that the scheme is compliant with the above SPPR's as included in the Apartment Guidelines (2018).

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

Aspect	Key Objective	Policy Provision	Statement of Consistency
Pillar 2: Accelerate Social Housing	Increase the level and speed of delivery of social housing and other State supported housing	Key actions: <ul style="list-style-type: none"> 47,000 social housing units delivered by 2021, supported by investment of €5.35 billion Mixed-Tenure Development on State Lands and other lands 	✓ The proposed development will provide 10% social housing units in line with legislative requirements. The development will therefore contribute 49no. units towards the delivery of social housing units as set within Pillar 2 of the Action Plan.
Pillar 3: Build More Homes	Increase the output of private housing to meet demand at affordable prices	Key actions: <ul style="list-style-type: none"> Doubling of output to deliver over 25,000 units per annum on average over the period of the Plan (2017-2021) 	✓ The proposed development will provide 732 no. residential units inclusive of 240 no. single-occupancy Shared Accommodation private living areas, and will therefore contribute towards this target.
Pillar 4: Improve the Rental Sector	Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.	Key actions: <ul style="list-style-type: none"> Encourage "build to rent" 	✓ The proposed development is a part "build-to-rent" scheme, designed to high standards and will support greater choice for tenants in the rental market including the provision of 240 no. single-occupancy Shared Accommodation private living areas which cater for young professionals.

3.5 Design Manual for Urban Roads and Streets (2013)

Design Principles	Provisions	Statement of Consistency
Integrated Street Networks	<ul style="list-style-type: none"> ▪ Does the development create connected centres that prioritise pedestrian movement and access to public transport? 	<ul style="list-style-type: none"> ✓ The proposed development will significantly improve permeability at this site for the wider community, creating key connections through the site at ground level to adjacent streets. ✓ The proposed internal roads have been designed to integrate with the surrounding road network and the future network of streets in the Masterplan area. ✓ The internal road network will prioritise pedestrian movement and has been designed to promote vehicular traffic speeds of 30km/hr or less. ✓ The site is accessible to a range of public transport options.
Movement and Place	<ul style="list-style-type: none"> ▪ Does the development create a legible street hierarchy that is appropriate to its context? ▪ Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e. community centre, shops, creche, schools etc.)? 	<ul style="list-style-type: none"> ✓ The proposed development will create a legible hierarchy of internal roads that responds to the site context and integrates with the surrounding street network. ✓ Pedestrian and cyclists will be accommodated at all primary and secondary access points but will also benefit from dedicated pedestrian/cycle access points at South Circular Road and St. Catherine's Avenue. ✓ Vehicular traffic will be regulated through provision of separate ingress/egress points and has been designed to meet DMURS standards.
Permeability and Legibility	<ul style="list-style-type: none"> ▪ Has the street layout been well considered to maximise permeability for pedestrians and cyclists? ▪ Are the streets legible with maximum connection opportunities? 	<ul style="list-style-type: none"> ✓ The layout provides for safe and permeable pedestrian and cycle routes facilitating connection within the proposed development and to the local street network.
Management	<ul style="list-style-type: none"> ▪ Is the layout designed to self-regulate vehicle speeds and traffic congestion? 	<ul style="list-style-type: none"> ✓ The proposed internal street network will prioritise pedestrian and cyclist movement and be designed to self-regulate driver behaviour,

Design Principles	Provisions	Statement of Consistency
	<ul style="list-style-type: none"> ▪ Does the proposed layout minimise noise / air pollution wherever possible? 	<p>encouraging speeds of 30km/hr or less.</p> <ul style="list-style-type: none"> ✓ Design of the internal roads has been undertaken within the context of the wider Masterplan area and has been developed to discourage 'rat running' so congestion is unlikely to be an issue at this location. ✓ The provision of reduced car parking in this central and accessible location will promote a modal shift toward public transport and away from private car travel. ✓ The residential blocks are compliant with Part E of the Building Regulations and as such sound insulation measures are considered. ✓ The emphasis on promoting a modal shift and use of renewable energy will assist with improving air quality.
<p>Movement, Place and Speed</p>	<ul style="list-style-type: none"> ▪ Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed? ▪ Does the design promote a reasonable balance of both physical and psychological measures to regulate speed? 	<ul style="list-style-type: none"> ✓ Vehicle access within the scheme is restricted and accordingly speed is not a consideration.
<p>Streetscape</p>	<ul style="list-style-type: none"> ▪ Does the scheme create an appropriate sense of enclosure in addition to a strong urban / suburban structure? ▪ Have street trees and areas of planting been provided where appropriate? ▪ Have active street edges been provided where appropriate? ▪ Is a palette of high-quality surface materials and finishes provided? 	<ul style="list-style-type: none"> ✓ A perimeter block system predominantly ranging from three to six storeys, with some higher elements which will create an appropriate sense of enclosure and enhance the urban structure within the site. Lower blocks of three storeys are concentrated along the site's boundaries where it adjoins existing low-rise dwellings ensuring the development responds sensitively to the established residential neighbourhood. ✓ The proposed scheme incorporates a comprehensive landscape plan that is carefully considered to provide a high-quality response to the redevelopment of this site and has regard to the hierarchy of open spaces proposed within the

Design Principles	Provisions	Statement of Consistency
		<p>Masterplan lands and the biodiversity value of the site.</p> <ul style="list-style-type: none"> ✓ Each block benefits from ground floor units with own door access to ensure that the internal streets are activated. This will be enhanced by the provision of neighbourhood level retail uses at street level. ✓ Façades for each building will utilise a mix of bricks consistent with the materiality prevalent in the Dublin 8 area. The use of brick as the predominant material alongside rendered façades in the courtyards that incorporate glass balustrades and aluminium and coloured accents will ensure a low maintenance and durable response to the local context. ✓ The original Player Wills factory building is to be retained as part of the proposed development, therefore, the development fronting onto South Circular Road will respect the character already established in this area.
<p>Pedestrian and Cyclist Environment</p>	<ul style="list-style-type: none"> ▪ Are footways of appropriate width provided so as to ensure pedestrian safety? ▪ Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations? ▪ Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required? ▪ Have cycle facilities been factored into the design? 	<ul style="list-style-type: none"> ✓ All footpaths within the development site will exceed minimum requirements. ✓ All pedestrian crossings have been designed as per DMURS and the DCC taking in charge specification. Appropriate tactile paving has been provided at all crossing points. Crossing points reflect the desire lines for both cyclists and pedestrians. ✓ All public realm / shared surfaces have been designed as per DMURS and the DCC taking in charge specification. Appropriate tactile paving has been provided to warn both cyclists and pedestrians of these shared spaces. ✓ A dedicated cycle stairway is to be provided to the basement carpark.

Design Principles	Provisions	Statement of Consistency
<p>Carriageway Conditions</p>	<ul style="list-style-type: none"> ▪ Are vehicular carriageways sized appropriately for their function / location? ▪ Are surface materials appropriate to their application in order to inform drivers of the expected driving conditions? ▪ Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists? ▪ Have adequate parking / loading areas been provided? 	<ul style="list-style-type: none"> ✓ Internal roads and carriageways have been designed to reduce vehicular speed and prioritise pedestrian and cyclist movements. Internal roads as proposed have been designed in accordance with DMURS requirements. ✓ The two main internal junctions will form a raised shared surface which will ultimately connect to a future new road to the west linking DCC lands & the former Bailey Gibson site as proposed in the masterplan. This area will have flush or low kerbing with tactile and contrasting paving marking the edge of the footpath and start of the road carriageway to allow for visually impaired pedestrians to navigate the space. ✓ All surface materials have been specified as per the requirements of DMURS and the DCC taking in charge specification. ✓ The internal road network has also been designed to accommodate circulation of refuse vehicles and emergency vehicles.

3.6 Sustainable Residential Development in Urban Areas (2009)

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Chapter 3 The Role of Design	Have designers carried out a site appraisal prior to preparing a layout?	✓ An Environmental Report has been prepared in respect of this site and has informed the proposed layout.
	Is the standard of design of a sufficiently high standard?	✓ Dublin City Council prepared a Masterplan including a site analysis, project vision, and concept designs prior to preparing the current scheme layout which was then used as a base to inform the proposed development.
	Does the design of residential streets strike the right balance between the different functions of the street, including a sense of place?	<p>✓ The supporting documentation that accompanies this report demonstrates that the proposed scheme meets relevant performance-based criteria and as such is of a high standard of design.</p> <p>✓ It is intended to improve existing connections with the surrounding street network, particularly at St. Catherine's Avenue and Donore Avenue. The redevelopment will also facilitate new connections with the adjoining SDRA 12 lands.</p> <p>✓ Pedestrian and cyclist movements shall be prioritised within the scheme through a series of shared internal streets and an extensive public realm.</p> <p>✓ The proposed development will make a significant contribution to the regeneration objectives for this site and surrounding lands.</p>
Chapter 4 Planning for Sustainable Neighbourhoods	Are lands in accordance with sequencing priorities of development plan or local area plan?	✓ The site is a priority site in terms of the National Planning Framework objective of urban densification, consolidation and re-use of existing brownfield sites.
	Assessment of the capacity of existing schools.	✓ The Social Infrastructure Audit (SIA) accompanying this submission concludes that the area is well served by primary and post primary schools and has 4 no. third level colleges within close proximity. In addition, provision has been made for expansion of St Catherine's National School within the Player Wills site.
	Input of other necessary agencies into the plan/development proposal?	
	Is there an appropriate range of community and support facilities?	✓ The central and accessible location of this site, being at the edge of the city centre, ensures that residents will enjoy access to a range of leisure, retail, and community facilities, as detailed in the SIA.
For higher density schemes, is there adequate existing public transport, or will it be provided in tandem with development.		

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		<ul style="list-style-type: none"> ✓ The proposed scheme is located in close proximity to high-capacity, high-frequency public transport services. ✓ The proposed development includes 2 no. Public Parks (5,310 sq.m), as well as the inclusion of a Cultural/Community Hub which supports the surrounding and future occupants of this development.
	<p>Will the development:</p> <ul style="list-style-type: none"> - Prioritise public transport, cycling and walking, and dissuade the use of cars. - Ensure accessibility for everyone including people with disabilities. - Encourage more efficient use of energy and reduction in greenhouse gases. - Include right quality and quantity of public open space. - Include measures for satisfactory standards of personal safety and traffic safety. - Present an attractive and well-maintained appearance. - Promote social integration, provide for diverse range of household types, age groups and housing tenures. - Protect and where possible enhance the built and natural heritage. - Provide for Sustainable Drainage Systems. 	<ul style="list-style-type: none"> ✓ Walking and cycling will be the dominant means of movement in the area and ease of access for pedestrians and cyclists is at the core of the design strategy. ✓ The proposed development contains reduced of residential car parking spaces and benefits from accessibility to LUAS and urban bus services. ✓ The scheme is designed incorporating the principles of universal access and to the standards of Part M of the Building Regulations. ✓ The proposed development is designed to Universal Design principles ensuring access for all. ✓ The scheme is designed to a BREEAM excellent rating meaning it will achieve a high level of energy efficiency and consequent reduction in the generation of GHGs. The low volume of carparking will also contribute to a reduction in emissions. ✓ The Housing Quality Audit that accompanies this application demonstrates that the scheme exceeds the communal open space requirement. ✓ The Landscape Design Statement outlines that there is a network of open spaces and extensive public realm intended for both active and passive use and catering for different age groups. ✓ Increased levels of pedestrian activity will be achieved by the inclusion of new pedestrian accessways in/out of the site and shared street spaces that prioritise pedestrians. Ground floor uses that

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		<p>promote activity and passive surveillance will result in a safer environment.</p> <ul style="list-style-type: none"> ✓ The Architectural and Landscape Design Statement presents the detail of the scheme's materiality and confirms that it will be an attractive place to live and sympathetic to the character of surrounding residential dwellings. ✓ The mix of units proposed includes studios, 1, 2, and 3 -bedrooms. ✓ Social and affordable accommodation will form part of the proposed scheme. ✓ Single-occupancy Shared Accommodation private living areas will form part of the development. ✓ The landscape proposals include features to enhance the biodiversity value of the site. ✓ A comprehensive surface water drainage strategy with SuDS features is proposed.
<p>Chapter 5 Cities and Larger Towns</p>	<ul style="list-style-type: none"> - Are residential densities sufficiently high in a location which are, or will be, served by public transport. - Are higher densities accompanied by high qualitative standard of design and layout? - Does the design and location of new apartment blocks respect the amenities of existing adjacent housing in terms of sunlight and overlooking? 	<ul style="list-style-type: none"> ✓ The proposed gross density is 239 units per hectare. This is appropriate given the site's location close to public transport and with immediate access to employment opportunities, in particular, the Coombe Hospital and St James' Hospital. ✓ The Housing Quality Audit demonstrates that the scheme meets the qualitative requirements of a build to rent scheme. 51% of the units are dual aspect, this exceeds the required 33%. ✓ There is minimal overshadowing from the proposed Player Wills development due to the considered architecture along the west side (along St. Catherine's Avenue) where the potential for overshadowing to existing buildings is greatest.
<p>Chapter 7</p>	<ul style="list-style-type: none"> - In higher density developments, does quality of design and finish extend to individual dwellings and its immediate surroundings. 	<ul style="list-style-type: none"> ✓ The proposed residential development will be a high-quality energy efficient design. Finishes have been carefully considered to integrate with the

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
The Home and Its Setting	<ul style="list-style-type: none"> - Decent levels of amenity, privacy, security and energy efficiency. 	<p>established residential character of the surrounding development whilst creating a distinctive new urban neighbourhood with its own identity.</p>
	<ul style="list-style-type: none"> - Will orientation of dwelling and internal layout maximise levels of daylight and sunlight? 	<ul style="list-style-type: none"> ✓ The buildings are NZEB compliant, provide for passive surveillance, includes a comprehensive landscaping scheme that meets established standards and provides occupants with a wide range of support services.
	<ul style="list-style-type: none"> - Has privacy been considered in design of the home. 	
	<ul style="list-style-type: none"> - Has the design sought to create child and pedestrian friendly car-free areas? 	<ul style="list-style-type: none"> ✓ 51% of the proposed units are dual aspect. The daylight/sunlight assessment confirms that 92% of the tested units meets the ADF target value and this would increase with all the upper floor rooms included in the assessment.
	<ul style="list-style-type: none"> - Has the design been influenced by the principles of universal design? 	<ul style="list-style-type: none"> ✓ The units are designed to avoid overlooking and all units will comply with the requirements of Part E in terms of noise insulation.
	<ul style="list-style-type: none"> - Has adequate provision been made for the storage and collection of waste materials? 	<ul style="list-style-type: none"> ✓ A reduced level of car parking is proposed. The design is focussed on prioritising pedestrians and promoting active modes of travel. ✓ The design complies with the requirements of Part M of the Building Regulations and principles of universal design. ✓ Dedicated residential waste storage areas are included in the basement. The facilities management company in conjunction with the waste contractor will be responsible for conveying the bins to two separate waste pick-up points within the site for collection and emptying.

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

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

Criteria No.	Aspect	Provisions	Statement of Consistency
1	Context - How does the development respond to its surroundings?	<ul style="list-style-type: none"> ▪ The development seems to have evolved naturally as part of its surroundings. ▪ Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users. ▪ Form, architecture, and landscaping have been informed by the development's place and time. ▪ The development positively contributes to the character and identity of the neighbourhood. ▪ Appropriate responses are made to the nature of specific boundary conditions. 	<ul style="list-style-type: none"> ✓ The scale of the development responds to the local surrounding scale. This is achieved through the tiering down of scale to the site perimeters to provide an appropriate relationship with existing development. At the same time, the site offers an excellent opportunity for increased densities to make an important contribution to the shortfall in the housing market and as such the opportunity for increased densities is responded to through the provision of taller buildings more centrally within the site. ✓ Daylight and sunlight impact assessments demonstrate that the scale and height of the proposed development does not have any significant negative impact on the internal or external environment in terms of overshadowing or daylight/sunlight impact. ✓ The architectural form of the development including retention of the original Player Wills factory building responds to the site context. A palette of materials leaning heavily on brick ensures compatibility with the surrounding context. ✓ The design of the public realm and landscaping ensures integration with the existing environment. In particular, improvements to Donore Avenue and St. Catherine's Avenue, including its widening, represent a planning benefit of the scheme. The improved Rehoboth Place will provide a

Criteria No.	Aspect	Provisions	Statement of Consistency
			<p>high-quality landscaped street connecting the development with South Circular Road.</p> <ul style="list-style-type: none"> ✓ The proposed development will make a significant positive contribution to character and identity of the neighbourhood. The replacement of the existing low-quality warehouse type buildings on the site, with a new residential neighbourhood of strong architectural design and with significant public realm and landscape features will positively contribute to the area. Whilst the site sits behind much of the existing Player Wills Factory Building sit when viewed from South Circular Road, the link by way of the improved Donore Avenue/St.Catherine's Avenue will offer a key link to the new neighbourhood, via a landscaped plaza at the entrance to the site. A number of ground floor active uses including a Cultural/Community Hub will positively contribute to footfall and sense of place. ✓ Particular care has been taken in respect of existing boundary conditions and the requirement to replace/upgrade these boundaries. This is addressed in detail in the Landscape Design Statement and associated drawings. The general principle has been to, where possible, retain and repair existing boundary conditions. In a number of instances, existing boundaries are formed to gable ends of existing buildings on site. In some cases, these gable walls are proposed to be retained and repaired to maintain existing boundary

Criteria No.	Aspect	Provisions	Statement of Consistency
			<p>conditions. This is considered a positive intervention both in terms of maintaining some remnants of the existing use, whilst also minimising impact on adjacent properties. To the south and east, temporary boundary conditions are proposed in the form of temporary fencing with planting, until such time as development of these lands are brought forward in the context of the overall site Masterplan.</p>
2	<p>Connections</p> <ul style="list-style-type: none"> - How well connected is the new neighbourhood? 	<ul style="list-style-type: none"> ▪ There are attractive routes in and out for pedestrians and cyclists. ▪ The development is located in or close to a mixed-use centre. ▪ The development's layout makes it easy for a bus to serve the scheme. ▪ The layout links to existing movement routes and the places people will want to get to. ▪ Appropriate density, dependent on location, helps support efficient public transport. 	<ul style="list-style-type: none"> ✓ The site is an infill site of significant scale. A key access route to the site is via Donore Avenue to the west. The entrance to the site from South Circular Road will be characterised by a landscaped pedestrian plaza, leading to a courtyard of the PW1 building. This provides for future connections to the east and north as part of the wider Masterplan. ✓ The scheme also provides for connections west via St. Catherine's Avenue which will allow for the free movement of pedestrians across the whole SDRA 12 Masterplan lands. ✓ All routes through the scheme facilitate pedestrian and cyclists as a priority. Generous footpaths and shared surfaces are provided to encourage pedestrian and cyclist use and permeability. ✓ The scheme is located close to the city centre, with a range of services and facilities. The city centre is within reasonable walking and cycling distance and there are a range of bus services available on South Circular Road.

Criteria No.	Aspect	Provisions	Statement of Consistency
			<ul style="list-style-type: none"> ✓ The layout ensures two connections to South Circular Road, with future connections north and west in accordance with the Masterplan approach. The layout therefore ensures a high level of permeability. ✓ As indicated previously, the opportunity to increase densities within a sensitively designed scheme relative to surrounding conditions is proposed in this urban location, ensuring that the population of the site is maximised and that the urban location close to the city and on a high efficiency bus route, is utilised.
3	<p>Inclusivity</p> <ul style="list-style-type: none"> - How easily can people use and access the development? 	<ul style="list-style-type: none"> ▪ New homes meet the aspirations of a range of people and households. ▪ Design and layout enable easy access by all. 	<ul style="list-style-type: none"> ✓ The residential units within the scheme have been fully designed to meet all relevant guidelines and standards in terms of sizes, storage areas, private open space, etc. Whilst the build to rent scheme is intended to primarily meet the demand for smaller units in response to reducing household sizes, a range of typologies are provided, including a number of house-type units. The scheme is considered to respond well in terms of providing a range of households to meet market demand. ✓ The development is designed to meet all Part M requirements. The scheme has been sensitively designed to ensure ease of travel through both the public realm and the buildings for people of all abilities. The scheme avoids ramps and stairs and provides clear, legible routes through the site.
4	Variety	<ul style="list-style-type: none"> ▪ Activities generated by the development contribute to the quality of life in its locality. 	<ul style="list-style-type: none"> ✓ Whilst primarily a residential scheme designed to meet the significant shortfall in

Criteria No.	Aspect	Provisions	Statement of Consistency
	<ul style="list-style-type: none"> - How does the development promote a good mix of activities? 	<ul style="list-style-type: none"> ▪ Uses that attract the most people are in the most accessible places. ▪ Neighbouring uses and activities are compatible with each other. ▪ Housing types and tenure add to the choice available in the area. ▪ Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood. 	<p>residential accommodation in the city, the proposed development does provide both dedicated tenant amenities for future residents, active ground floor uses, and a creche facility. The size, extent and type of commercial uses proposed has been based on a detailed Social Infrastructure Audit carried out by MH Planning and has evolved in collaboration with Dublin City Council as part of the master-planning exercise for SDRA 12.</p> <ul style="list-style-type: none"> ✓ Such uses are intended to provide for the needs of the future population, whilst also acknowledging that the city centre with its range of services and facilities is a short distance from the site. ✓ Commercial uses have been located at ground floor level to both provide activity and to ensure accessibility and visibility. ✓ In terms of housing choice and tenure, as indicated previously the primary purpose of the residential content of the scheme is to meet clear demand for build to rent accommodation in urban locations. The scheme does provide a range of type and size of units, including Shared Living Units. It is noted that the predominant nature of the surrounding area is traditional housing. To reflect the nature and scale of this existing housing, the scheme ensures a tiering down to the site perimeters to ensure that the existing site boundary conditions are dealt with in a sensitive and appropriate manner.
5	Efficiency	<ul style="list-style-type: none"> ▪ The proposal looks at the potential of higher density, considering appropriate 	<ul style="list-style-type: none"> ✓ The site offers an excellent opportunity for increased densities to make an

Criteria No.	Aspect	Provisions	Statement of Consistency
	<p>- How does the development make appropriate use of resources, including land?</p>	<p>accessibility by public transport and the objectives of good design.</p> <ul style="list-style-type: none"> ▪ Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems. ▪ Buildings, gardens and public spaces are laid out to exploit the best solar orientation. ▪ The scheme brings an underutilised and semi-derelict site into more productive use. ▪ Appropriate recycling facilities are provided. 	<p>important contribution to the shortfall in the housing market and as such the opportunity for increased densities is responded to through the provision of taller buildings more centrally within the site.</p> <ul style="list-style-type: none"> ✓ The site location within a short distance of the city centre and adjacent to high quality public transport, together with the site characteristics of a significant brownfield site in a backland location, mean that the site is ideally suited to higher densities in a manner which ensures that there is no negative impact on internal or external environments. ✓ A series of verified views prepared demonstrate that the scale of the proposed development responds positively to the site context, with the proposed buildings clearly sitting well within the urban context. Daylight and sunlight impact assessments clearly demonstrate that the scale and height of the proposed development does not have any significant negative impact on the internal or external environment in terms of overshadowing or daylight/sunlight impact. ✓ In terms of landscaped areas, whilst this is primarily an urban scheme, a series of high-quality plazas and spaces are provided, with appropriate soft landscaping which contributes to biodiversity. The scheme on this site must be viewed in the wider context of the SDRA Development Framework and Masterplan, both of which clearly set out the open space strategy for the wider lands. Larger open space areas are located on other parts of the SDRA lands. Therefore, care

Criteria No.	Aspect	Provisions	Statement of Consistency
			<p>must be taken to ensure that the application site at Player Wills achieves a high-quality public realm and domain through the design of pedestrian friendly streets interspersed with plaza areas. It is considered that this is achieved in the proposed development.</p> <ul style="list-style-type: none"> ✓ A central and early consideration in the design of the scheme was to ensure that public areas and communal open spaces are high quality environments which achieve appropriate amounts of sunlight. It is clear from the submitted Daylight and Sunlight Analysis that this is achieved. All communal spaces achieve high levels of sunlight access that exceed the BRE Guideline values. ✓ The development will provide an appropriate development on a significantly under-utilised site. The site is presently vacant. The previous use on the site (former Player Wills tobacco factory) represented an inefficient use of this strategically located site. ✓ The scheme has been designed to ensure that operational waste management facilities include recycling facilities for residents.
6	<p>Distinctiveness</p> <ul style="list-style-type: none"> - How does the proposal create a sense of place? 	<ul style="list-style-type: none"> ▪ The place has recognisable features so that people can describe where they live and form an emotional attachment to the place. ▪ The scheme is a positive addition to the identity of the locality. 	<ul style="list-style-type: none"> ✓ The scheme aims to create a new residential neighbourhood. As indicated previously, in terms of landscaped areas, whilst this is primarily an urban scheme, a series of high-quality plazas and spaces are provided, with appropriate soft landscaping. The scheme's street network and legibility, populated to

Criteria No.	Aspect	Provisions	Statement of Consistency
		<ul style="list-style-type: none"> ▪ The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout. ▪ The proposal successfully exploits views into and out of the site. ▪ There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre. 	<p>active uses at ground floor level, will provide a sense of place and community. The scheme on this site must be viewed in the wider context of the SDRA Development Framework and Masterplan, both of which clearly set out the open space strategy for the wider lands. Larger open space areas are located within the SDRA lands which act as focal points, including those proposed within the application site. Therefore, care must be taken to ensure that the application site at Player Wills achieves a high quality public realm and domain through the design of pedestrian friendly streets interspersed with plaza areas. It is considered that this is achieved in the proposed development.</p>
7	<p>Layout</p> <ul style="list-style-type: none"> - How does the proposal create people-friendly streets and spaces? 	<ul style="list-style-type: none"> ▪ Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around. ▪ The layout focuses activity on the streets by creating active frontages with front doors directly serving the street. ▪ The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers. 	<p>✓ The layout has been strongly influenced by desire lines and permeability. Two pedestrian entrance points are located from South Circular Road with an exit-only access point also located on South Circular Road, with the main vehicular entrance proposed from Donore Avenue. Both access points accommodate pedestrian and cyclist access and egress. Donore Avenue is improved to provide an appropriate route to the development while ensuring pedestrian and traffic safety. The street network has been heavily influenced by these two access/egress points, together with the desire to continue a north-south street on a similar alignment to other roads in the surrounding area. The north-south route is delivered up to the northern boundary to provide a future link through the Masterplan lands.</p>

Criteria No.	Aspect	Provisions	Statement of Consistency
			<ul style="list-style-type: none"> ✓ The scheme performs strongly in terms of providing active frontages. The active frontages are provided by a number of uses, including a creche, tenant amenity spaces, retail/café spaces, and access points to private residential properties. ✓ All routes through the scheme facilitate pedestrian and cyclists as a priority. Generous footpaths and shared surfaces are provided to encourage pedestrian and cyclist use and permeability. ✓ The scheme creates a series of welcoming streets, wide in nature and subject to high quality landscaping. A number of plaza spaces are provided, for example to the east of the PW2 building and an internal courtyard in the PW1 building which acts as an entrance to the development from South Circular Road. The scheme must be viewed in the context of the overall SDRA Framework Plan and Masterplan, whereby the public open space areas are provided on other parts of the wider lands. ✓ Vehicular traffic on the internal street network is limited. There is very limited on-street car parking. This is assisted by a one-way traffic system and cars being encouraged to park cars in the secure. Low traffic speeds will be generated through the shared nature of the streets, planting close to the traffic aisle and the provision of civic spaces/plazas at intervals throughout the scheme.
8	Public Realm - How safe, secure and	<ul style="list-style-type: none"> ▪ All public open space is overlooked by surrounding homes so that this amenity is 	<ul style="list-style-type: none"> ✓ The development has high degree of passive surveillance of the streets and associated spaces. Block PW4 will

Criteria No.	Aspect	Provisions	Statement of Consistency
	enjoyable are the public areas?	<p>owned by the residents and safe to use.</p> <ul style="list-style-type: none"> ▪ The public realm is considered as a usable integrated element in the design of the development ▪ Children’s play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood. ▪ There is a clear definition between public, semi private, and private space. ▪ Roads and parking areas are considered as an integral landscaped element in the design of the public realm. 	<p>provide passive surveillance of the future open space to north east of the site, both from residential units and from active uses at ground floor.</p> <ul style="list-style-type: none"> ✓ The public realm has been designed strongly as an integral part of the scheme. As indicated previously, the scheme must be viewed in the context of the overall SDRA Framework Plan and Masterplan, whereby public open space areas are also provided on other parts of the wider lands. However, the streets are generous in width and provide safe and pleasant environments for future residents and visitors. ✓ Public spaces are all clearly defined. Where appropriate, street level private open space is provided with a planted privacy buffer from the street. ✓ As indicated previously, on-street parking is deliberately limited. Where provided, parking spaces are clearly delineated adjacent to the vehicular surface car parking.
9	<p>Adaptability</p> <p>- How will the buildings cope with change?</p>	<ul style="list-style-type: none"> ▪ Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation. ▪ The homes are energy-efficient and equipped for challenges anticipated from a changing climate. ▪ Homes can be extended without ruining the character of the types, layout and outdoor space. 	<ul style="list-style-type: none"> ✓ The proposed scheme is a Build to Rent scheme with the 15-year ownership and operation covenant applying. ✓ All residential units are designed to meet current Part L requirements and the proposed development has been designed to a BREEAM rating of Excellent. ✓ The adaptability criteria typically relate to a more traditional housing development. The nature of the apartment and shared living units means that opportunity for extension is limited. This is standard across the apartment market.

Criteria No.	Aspect	Provisions	Statement of Consistency
			<ul style="list-style-type: none"> ✓ The units allow for the provision of a home office or similar, if desirable. There is sufficient internal space to adapt a second bedroom, if required, to a small home office within the proposed apartments.
10	<p>Privacy and Amenity</p> <ul style="list-style-type: none"> - How does the scheme provide a decent standard of amenity? 	<ul style="list-style-type: none"> ▪ Each home has access to an area of useable private outdoor space. ▪ The design maximises the number of homes enjoying dual aspect. ▪ Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout. ▪ Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units. ▪ The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables. 	<ul style="list-style-type: none"> ✓ Homes have access directly to either a private terrace or balcony, which in all cases meets or exceeds minimum size requirements. The balcony spaces are semi recessed to give shelter and privacy to the units allowing for the balconies to be used year-round. ✓ Dual aspect exceeds the minimum 33% requirement. The dual aspect provision is 51%. ✓ All residential units are designed to current building regulation (Part E) standards and ensure appropriate sound/acoustic environments. ✓ The design of the scheme ensures that there is no undue overlooking into adjacent properties. ✓ Each residential unit is provided with storage space which meets or exceeds the minimum requirements.
11	<p>Parking</p> <ul style="list-style-type: none"> - How will parking be secure and attractive? 	<ul style="list-style-type: none"> ▪ Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces. ▪ Adequate secure facilities are provided for bicycle storage. 	<ul style="list-style-type: none"> ✓ Parking is principally provided at basement level, with limited on-street parking. The provision of parking at basement level allows for a high-quality pedestrian environment to be created at surface level. ✓ Parking at surface level occurs on-street and will benefit from passive surveillance both from residential units and from ground floor active uses, in

Criteria No.	Aspect	Provisions	Statement of Consistency
			<p>addition to footfall on the streets.</p> <p>✓ On-street parking is in designated bays with a surface material to match the palette of materials used for the streets.</p> <p>✓ Bicycle parking is secure.</p>
12	<p>Detailed Design</p> <p>- How well thought through is the building and landscape design?</p>	<ul style="list-style-type: none"> ▪ The materials and external design make a positive contribution to the locality. ▪ The landscape design facilitates the use of the public spaces from the outset. ▪ Design of the buildings and public space will facilitate easy and regular maintenance. ▪ Care has been taken over the siting of flues, vents and bin stores. 	<p>✓ Brick is the predominant material in the surrounding context and the proposal aims to enhance and build upon this existing characteristic. A brick to match that seen on the South Circular Road and buff coloured brick similar to the local Dolphins Barn brick traditionally used in developments in Dublin is proposed. In addition, a dark brick is used as an accent material throughout the development which provides additional visual interest to the different buildings. The variation of brick colour is utilized to break down massing and differentiate from lower horizontal levels and the taller vertical blocks.</p> <p>✓ The landscape design accommodates a range of uses.</p> <p>✓ Bin storage is at ground and basement level.</p>

3.8 Childcare Facilities Guidelines for Planning Authorities (2001)

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

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Chapter 3	In new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site.	✓ A Childcare Assessment accompanies this application. The assessment takes a conservative assumption in terms of the number of childcare spaces that will be generated by the scheme i.e. that all children will be cared for in a childcare facility. It identifies that there is existing

		<p>under provision within the 1-kilometre zone of influence. The existing and future demographic profile for the area is identified. Based on all of the relevant parameters it is concluded that it is appropriate to integrate a childcare facility into the proposed scheme.</p> <ul style="list-style-type: none"> ✓ Recognising the deficiency in childcare capacity within the catchment, the proposed scheme incorporates a childcare facility with a gross floor area of 275 sq.m and will thus provide for the maximum childcare needs generated by the scheme as well as providing a service for the wider catchment. ✓ This is considered reasonable as the provision of childcare within a catchment should not be concentrated one location. To do so would distort the geographical distribution of facilities and undermine access to the service in the wider area.
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3.9 Architectural Heritage Protection – Guidelines for Planning Authorities (2011)

The proposed development retains the original Player Wills factory building to. This document provides detailed guidance notes on the conservation of older buildings which is included in Chapter 7.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Section 7.3.1	It is generally recognised that the best method of conserving a historic building is to keep it in active use. Where a structure is of great rarity or quality, every effort should be made to find a solution which will allow it to be adapted to a new use without unacceptable damage to its character and special interest.	The proposed development includes the retention of the original Player Wills factory building which will be converted into Build to Rent and Shared Living accommodation, therefore keeping the building in active use. This solution allows the building to retain all its original features where possible and will retain this part of Dublin's Industrial heritage.
Section 7.4.1	Before formulating proposals for works to a protected structure, the developer should research its historical development and understand thoroughly the present condition of the structure.	A Conservation report was prepared by David Slattery Conservation Architects prior to the preparation of the proposed development. This report highlighted the original features of the building which were considered vital to retain in order to preserve the Industrial heritage of this part of Dublin.
Section 10.4.15	The visual impact of alterations to the windows of a historic structure can be significant. Proposals to remove, replace or otherwise alter historic windows should be given close attention.	Replacement of the windows to those which are damaged beyond repair with steel casement windows will ensure that the external alterations respect the character of the original Player Wills building.

4 Regional Planning Policy

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

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

Reference	Relevant Policy / Objective	Statement of Consistency
RPO 3.4	Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	<ul style="list-style-type: none"> ✓ The subject development does not fall within development classes set out in Part 1 of Schedule 5. ✓ The proposed development falls within the category of an 'Infrastructure Project' within Schedule 5 (10) (b) of the Planning and Development Regulations, which provides that a mandatory EIA must be carried out for projects including inter alia; 10b)(i) <i>Construction of more than 500 dwellings.</i> The proposed development incorporates 492 no. apartments and 240 no. Shared Living Accommodation private living areas and EIA is thus not a mandatory requirement under this provision. 10b)(ii) <i>Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)</i> The application area is c.3.06 hectares and surrounding land uses comprise residential, health related and commercial. Given the site's proximity to the city centre, the emerging pattern of development in the City i.e. compact urban growth, the site may be defined as being at the edge of a business district and applying the precautionary principle, it is considered that on this basis an EIA of the proposed development is required.

		<ul style="list-style-type: none"> ✓ An Environmental Impact Assessment Report and AA Screening Report accompanies this submission.
RPO 4.3	Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.	<ul style="list-style-type: none"> ✓ The proposed development will be situated on an infill / brownfield site providing high density residential units within the canal ring of Dublin. The site is in close proximity to high capacity and high frequency public transport services and confirmed as acceptable by Irish Water.
RPO 5.3	Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.	<ul style="list-style-type: none"> ✓ The subject site is well connected in terms of road and public transport. Fatima LUAS stop is c.800m north-west of the site, while South Clondalkin QBC links the site with the city centre and south-west suburbs of Dublin, extending along Cork Street / Dolphin's Barn Street c.200m to the west. Dublin Bus also operates along the South Circular Road with bus stops on the north and south side of the road c.100m from the site with services operating in both directions. ✓ The site is proximate to employment centres in the city centre, as well as the Coombe Hospital and St James' Hospital. ✓ The proposed development minimises car parking provision to promote a modal shift. ✓ The scheme prioritises active modes of travel by enhancing permeability of the site, providing dedicated pedestrian and cycle routes in / out of the site and through the design of shared internal street spaces that slow vehicular traffic and give precedence to pedestrians and cyclists. ✓ Subsequent development of the adjoining Masterplan / SDRA lands

		will create additional connections for pedestrians and cyclists to the north and east through to Donore Avenue.
RPO 5.4	Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines' and 'Urban Development and Building Heights Guidelines for Planning Authorities'.	✓ The gross density is 239 units per hectare and is compliant with the qualitative standards for the development of sustainable residential development as established in the Housing Quality Audit and Architectural and Landscape Design Statement that accompanies this application.
RPO 5.5	Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.	<p>✓ Analysis of the demographic profile within 1km of the subject site demonstrates the need for the proposed housing mix. A Unit Mix Justification report is submitted as an Appendix to the Planning Statement submitted under separate cover. Census 2016 indicates that within a 1km radius of the subject site there are approximately two and half times as many 1-2 person households as there are 1-2 person homes - a deficit of c.150%.</p> <p>✓ The proposed development of this central and accessible urban brownfield site would realise the objective of consolidation of Dublin and compact growth.</p>
RPO 8.7	To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.	✓ A Mobility Management Plan is included with this application under separate cover. It concludes that overall, the location of the proposed development, along with the measures considered, will aim to ensure that travel by public transport, by bike or by foot is a preferred alternative to travel by private car for a significant portion of travellers.

<p>RPO 9.13</p>	<p>Local authorities and relevant agencies shall ensure that new social infrastructure developments are accessible and inclusive for a range of users by adopting a universal design approach and provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives.</p>	<ul style="list-style-type: none"> ✓ The proposed creche will be available to cater to the needs of the wider community, not only the resident population. ✓ The proposed development is designed in accordance with the Building Regulations Part M, Universal Design principles. ✓ It is also envisaged that occupiers of the development have the ability to move between different unit sizes during the different stages of their lives. 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.
<p>RPO 9.3</p>	<p>Support the sensitive reuse of protected structures.</p>	<ul style="list-style-type: none"> ✓ There are no protected structures on the subject site.

5 Conclusion

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

The proposed development exceeds the height limitation, 50m, of the City Development Plan and accordingly a material contravention arises. A justification is presented in the Planning Statement and it is submitted that having regard to the provisions of section 37(2)(b) of the Planning and Development Act 2000 (as amended), the Board may grant permission as the proposed development if of both strategic and national importance and permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, the statutory obligations of the local authority, and relevant policy of the Government.

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 proposed development offers a unique opportunity to transform this under-utilised brownfield site into a vibrant new urban quarter near the heart of Dublin City and contribute to the supply of much needed housing. Thus, redevelopment of the Player Wills site will increase the available housing stock and add vitality to the local area, significantly improving the site's permeability and creating an attractive public realm.

Given the highly central and accessible nature of the site location, the most sustainable strategy for its redevelopment is to maximise density and height, minimise car parking and promote active modes of travel that prioritise pedestrians and cyclists.

The overarching objective is to create a vibrant new residential neighbourhood that can address the wider regeneration challenges presented at this site. The current proposal achieves this by providing opportunities to enhance legibility and connectivity to the site and surrounding street network, benefitting surrounding residents and future occupants. The proposed development will create a high-density residential development underpinned by a height strategy that responds with sensitivity to surrounding low-rise housing whilst delivering an appropriate scale of development for this urban site.

The proposed development responds to the housing demands of the local community and workforce by incorporating a mix of unit typologies that will address the shortfall in rental accommodation and meet the identified needs of Dublin City. The proposed scheme also incorporates additional supporting retail and community functions, to maximise resident amenity. This residential led development has been designed to meet and where possible exceed the requirements of the Design Standards for New Apartments Guidelines (2018).

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

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 character and the wider strategic regeneration objectives for this site.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national,

regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality Strategic Housing Development application which is now submitted for the consideration of An Bord Pleanála.