

**STRATEGIC HOUSING DEVELOPMENT
PLANNING APPLICATION**

STATEMENT OF CONSISTENCY

**FOR LANDS AT HOLY CROSS COLLEGE, CLONLIFFE ROAD, DUBLIN 3
AND DRUMCONDRA ROAD LOWER, DRUMCONDRA, DUBLIN 9.**

BSM

Est.
1968

**Brady Shipman
Martin**

**Built.
Environment.**

Place
Making
**Built
Environment**

CLIENT
CWTC Multi Family ICAV acting on behalf of its
sub-fund DBTR DR1 Fund

DATE
July 2021

Brady Shipman Martin

DUBLIN

Canal House
Canal Road
Dublin 6

+353 1 208 1900

CORK

Penrose Wharf Business Centre
Penrose Wharf
Cork

+353 21 242 5620

LIMERICK

11 The Crescent
Limerick

+353 61 315 127

mail@bradyshipmanmartin.com

www.bradyshipmanmartin.com

TABLE OF CONTENTS

1	INTRODUCTION	4
2	CONSISTENCY WITH PLANNING POLICY	6
2.1	National and Regional Planning Policy.....	6
2.2	Rebuilding Ireland – Action Plan for Housing and Homelessness	6
2.3	Project Ireland 2040 National Planning Framework (Published 16/02/2018)	7
2.4	Eastern and Midland Regional Assembly –Regional Spatial & Economic Strategy (RSES)	9
2.5	Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)	10
2.6	Urban Design Manual – A Best Practice Guide (2009)	12
2.7	Sustainable Urban Housing: Design Standards for New Apartments (2018)	17
2.8	Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)	19
2.9	Design Manual for Urban Roads and Streets (DMURS) (2013)	19
2.10	Guidelines for Planning Authorities on Childcare Facilities (2001)	20
2.11	Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020	20
2.12	Transport Strategy for the Greater Dublin Area 2016 – 2035.....	21
2.13	Guidelines for Planning Authorities on ‘The Planning System and Flood Risk Management (November 2009)’	22
2.14	Birds and Habitats Directive – Appropriate Assessment.....	23
2.15	EIA Directive	23
3	Local Planning Policy	25
3.1	Dublin City Development Plan 2016-2022.....	25
3.1.1	Core Strategy & Zoning Objective.....	25
3.1.2	Shape and Structure of the City.....	26
3.1.3	Residential Development	27
3.1.4	Movement and Transport.....	28
3.1.5	Green Infrastructure, Open Space & Recreation	29
3.1.6	Height.....	31
3.1.7	Residential Development Standards- Apartments.....	32
3.1.8	Part V – Social Housing	32
4	CONCLUSION	33

1 INTRODUCTION

On behalf of CWTC Multi Family ICAV acting on behalf of its sub-fund DBTR DR1 Fund, this Statement of Consistency with Planning Policy has been prepared to accompany a Strategic Housing Development Pre-Application Consultation Request to An Bord Pleanála in relation to a proposed Strategic Housing Development Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9.

The development will consist of the construction of a Build To Rent residential development set out in 12 no. blocks, ranging in height from 2 to 18 storeys, to accommodate 1614 no. apartments including a retail unit, a café unit, a crèche, and residential tenant amenity spaces. The development will include a single level basement under Blocks B2, B3 & C1, a single level basement under Block D2 and a podium level and single level basement under Block A1 to accommodate car parking spaces, bicycle parking, storage, services and plant areas. To facilitate the proposed development the scheme will involve the demolition of a number of existing structures on the site.

The proposed development sits as part of a wider Site Masterplan for the entire Holy Cross College lands which includes a permitted hotel development and future proposed GAA pitches and clubhouse.

The site contains a number of Protected Structures including The Seminary Building, Holy Cross Chapel, South Link Building, The Assembly Hall and The Ambulatory. The application proposes the renovation and extension of the Seminary Building to accommodate residential units and the renovation of the existing Holy Cross Chapel and Assembly Hall buildings for use as residential tenant amenity. The wider Holy Cross College lands also includes Protected Structures including The Red House and the Archbishop's House (no works are proposed to these Structures).

The residential buildings are arranged around a number of proposed public open spaces and routes throughout the site with extensive landscaping and tree planting proposed. Communal amenity spaces will be located adjacent to residential buildings and at roof level throughout the scheme. To facilitate the proposed development the scheme will involve the removal of some existing trees on the site.

The site is proposed to be accessed by vehicles, cyclists and pedestrians from a widened entrance on Clonliffe Road, at the junction with Jones's Road and through the opening up of an unused access point on Drumcondra Road Lower at the junction with Hollybank Rd. An additional cyclist and pedestrian access is proposed through an existing access point on Holy Cross Avenue. Access from the Clonliffe Road entrance will also facilitate vehicular access to future proposed GAA

itches and clubhouse to the north of the site and to a permitted hotel on Clonliffe Road.

The proposed application includes all site landscaping works, green roofs, boundary treatments, PV panels at roof level, ESB Substations, lighting, servicing and utilities, signage, and associated and ancillary works, including site development works above and below ground.

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

This standalone planning policy consistency statement, prepared by Brady Shipman Martin, demonstrates that the proposal is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and with local planning policy. It should be read in conjunction with the accompanying detailed documentation prepared by HJL Architects, O'Mahony Pike Architects, O'Donnell Tuomey Architects, McCullough Mulvin Architects, Barrett Mahony Consulting Engineers, SYSTRA, NMP Architecture and Landscape.

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

2 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

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

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

2.1 Rebuilding Ireland – Action Plan for Housing and Homelessness

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

The Plan contains five key pillars:

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

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

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

The proposed development at Clonliffe College is consistent with Pillars 2, 3 and Pillar 4 as the scheme is proposing to construct 1,614 no. Built to Rent apartments on a highly accessible site in Dublin City which includes for both 10% social housing in line with Part V requirements and an additional 10% affordable housing.

It is considered that while the Drumcondra area of Dublin is highly accessible to the City Centre and to existing public transport and local amenities, there has been limited opportunity for increasing the housing stock in the area due to limited sites for significant development. The provision of 1,614 residential units in a single site within an established neighbourhood is in line with the objectives of Rebuilding Ireland.

2.2 Project Ireland 2040 National Planning Framework (Published 16/02/2018)

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

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

Project Ireland 2040 contains two key plans: the National Planning Framework (NPF); and the National Development Plan Framework (NDP) which, in tandem,

set out infrastructure priorities and plan regional development for the country. The NPF is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

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

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

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

National Policy Objective 4 in this regards states:

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

National Policy Objective 11 in this regards states:

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

National Policy Objective 13 in this regards states:

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

The NPF requires homes to be located in places that can support sustainable development this includes places that are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change. The proposed development is also responding to the existing strong demand in the area and in a location that is highly accessible to both existing local facilities and public transport routes within the urban extent of Dublin City.

2.3 Eastern and Midland Regional Assembly –Regional Spatial & Economic Strategy (RSES)

The Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the state. The Strategy identifies that the region *'is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region'*.

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

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

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *'the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities.'* These include: City Centre within the M50 and Metrolink - LUAS Corridor

Policy Objective relating to Housing Delivery include:

RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative

standards as set out in the ‘Sustainable Residential Development in Urban Areas’ , ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and Draft ‘Urban Development and Building Heights Guidelines for Planning Authorities’.

The RSES sets out Growth Enablers for Dublin City and Metropolitan Area.

- *To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life.*
- *To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.*

The MASP identifies a ‘Strategic residential and employment development corridors’ in order to create sustainable compact communities with improved housing choice, access to social and economic opportunities, enhanced services and amenities for the residents of Dublin.

While the MASP remains at a high level, the subject site is broadly located along the ‘Metrolink - LUAS Corridor’ connecting Swords with the City Centre via Dublin Airport; and within ‘Dublin City within the M50’. The exact route of the Metrolink is currently under consultation, however the proposed development is strategically positioned to utilise future transport investment in large scale transport the area given the proposed current location at Cross Guns Bridge less than a 10 minute walk away.

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

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

The Guidelines reinforce that planning authorities ‘*should promote increased residential densities in appropriate locations, including city and larger town*

centres’ and that ‘firm emphasis must be placed by planning authorities on the importance of qualitative standards in relation to design and layout in order to ensure that the highest quality of residential environment is achieved’.

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

In regard to institutional lands sites the guidelines state: institutional lands and ‘windfall’ which are often characterised by a large private or institutional building set in substantial open lands and which in some cases may be accessible as an amenity to the wider community, any proposals for higher density residential development must take into account the objective of retaining the “open character” of these lands, while at the same time ensuring that an efficient use is made of the land. In these cases, a minimum requirement of 20% of site area should be specified; however, this should be assessed in the context of the quality and provision of existing or proposed open space in the wider area. Whilst the quantum of open space may be increased vis-à-vis other sites, the amount of residential yield should be no less than would be achieved on any comparable residential site. Increasing densities in selected parts of the site subject to the safeguards expressed elsewhere may be necessary to achieve this.

The masterplan for the overall lands recognises the open character of the site. In its current condition the site comprises a series of spaces divided by large mature trees and buildings. The area to the north of Holy Cross College is visually disconnected from the portion of the lands to the south near Clonliffe Road. The proposal continues the alignment of the existing institutional buildings, using the existing rows of trees and roads to guide the overall site layout. While the site will change significantly, the overall layout reflects the overall character of the lands responding to the topography, mature trees and respecting the presence of protected structures.

In identifying appropriate locations for increased density the Guidelines note that particular institutional sites should be promoted stating: A considerable amount of developable land in suburban locations is in institutional use and/or ownership. Such lands are characterised by large buildings set in substantial open lands which in some cases may offer a necessary recreational or amenity open space opportunity required by the wider community planning authorities permit the development of such lands for residential purposes, it should then be an objective to retain some of the open character of the lands, but this should be assessed in the context of the quality and provision of existing or proposed space in the area generally. In the development of such lands, average net densities at least in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands achieved by concentrating increased densities in

selected parts (say up to 70 dph). The preparation of local area plans setting out targets for density yields, recreational uses and urban form should be considered in advance of development. In the absence of an LAP application for development of institutional lands should be accompanied by a masterplan outlining proposals for the entire landholding.

Having regard to the above which, is in agreement with the Core Strategy of the Development Plan, promotes the intensification and consolidation of Dublin City.

While the density proposed, at 202 units per hectare, is higher than suggested in the Guidelines it is considered that the scale of the site is capable of accommodating this increased intensity of development while integrating into the existing established residential areas.

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

This underutilised, institutional site is approximately 400m from Drumcondra Commuter Railway Station to the south west, and to the main Drumcondra Road, which is a quality bus corridor (QBC) and is served by several Dublin Buses including: No's 13; 16; 41; 41c; 1; 11; 33; and 44. It is anticipated that the site will be served by Bus Connects 'Core Bus Corridor No. 2' (Swords to City Centre). As such is in an ideal location to maximise return on previous and future public transport investment. Additionally the site is located less than 10 minutes' walk from the proposed Glasnevin Metrolink site.

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

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

The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. These are listed below, with a response to each provided, and should be read in conjunction with the individual Architect's Design Statements.

Context: How does the development respond to its surroundings?

The proposed development has been designed to respond positively to the existing established context. This context varies widely from the existing established institutional buildings with large mature trees to the existing adjacent

residential communities. These communities comprise a mix of newer apartment blocks such as the Corn Mill apartments, 2 storey terrace housing of areas including those at Susanville Road, and the red brick semi-detached houses fronting onto Drumcondra Road Lower.

The layout and the scaling of the site has responded to these adjacencies ensuring minimal impact on residential amenity while simultaneously respecting the existing wooded character of the site and utilising the large spaces of unused institutional lands.

The River Tolka is also a short distance to north. The proposed development will be separated from the Tolka River as a result of the GAA pitches as indicated in the Masterplan for the lands.

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

The lands at Holy Cross College are located adjacent to a key radial route from Dublin City Centre, Drumcondra Road is a National route (N1) connecting Dublin City with the significant suburbs on Dublin's northside, the M50 and Dublin Airport. This route has multiple transport modes and is designated for a future Core Bus Corridor. The lands are accessed primarily from Clonliffe Road to the south and Drumcondra Road to the west with secondary pedestrian and cyclist connections also from the south and west. The proposal will improve local connections by providing permeability through the site while also allowing for future connections over the river to the north.

The subject site is set back from Drumcondra Road and comprises a small portion of frontage onto Clonliffe Road which is a heavily trafficked route connecting Drumcondra to Fairview. While the site is primarily bound by Drumcondra Road to the west, the proposed boundary will maintain the existing wooded character.

The proposed scheme will animate a section of Clonliffe Road previously occupied by blank wall. Thus creating active frontage and contributing to the public realm and passive surveillance.

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

The proposed development will provide vehicular access via two points, the first at the existing entrance onto Clonliffe Road and the second on Drumcondra Road, both of which also provide for vehicular, cyclist and pedestrian access.

Vehicular access is provided internally via a primarily single access route however no through traffic will be available to non-residents minimising impact on the existing road network. Permeability within the site is provided by a network of pedestrian and cyclist facilities.

The site is within short walking distance of local commercial centres, community services and employment uses for future residents and the openness of the site and extensive public realm will ensure a greater use of the site to existing communities.

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

As detailed fully in the Masterplan for the lands, the wider site will contain a hotel, sports facilities including GAA pitches and a clubhouse and Riverwalk. The proposed development primarily provides for residential development with wider uses include tenant amenity, a crèche and a retail unit.

In terms of residential mix, the proposed scheme provides for a mix of unit types by providing studios, 1-bed, 2 bed and 3- bed units ensuring a mixed population and household type.

The use of the site for both existing communities and future residents is focused around the extensive public open space which includes a dog park, playgrounds, formal green, seminary garden, woodland walk and more which will ensure a mixing of people, engagement and activity.

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

It is considered that the site, given its scale and location, represents a significantly underutilised site. While some of the established institutional uses will continue on the site the remainder of the site is no longer required for these purposes and the extent of unused space is significant. The site in its present condition comprises a series of protected structures, older commercial buildings, green fields and greenspaces.

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

The scheme as proposed contains a variety and mix of building designs, heights and materials to respond to the existing institutional, wooded character of the site without impacting the surrounding residential areas, which combined contribute to creating a sense of place on this significant site.

Views of the existing protected structures and their settings are maintained at key locations adding character to the area. The proportions of these protected structures are also respected in the site strategy.

Key buildings such as the taller buildings are set back from the boundaries of the site to the north and the east, create important visual attractions and distinctiveness, enabling transitioning from the existing buildings and adjacent residential uses.

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

The aim of the internal road layout and access strategy is the creation of a connected, walkable and cyclable network which facilitates and encourages the sustainable and safe movement of people whilst maintaining a strong sense of place. The design considers the ease of movement for all modes, including cars, but a balanced approach has been taken which is in line with the principles set out in the Design Manual for Urban Roads and Streets (DMURS).

To achieve the objectives outlined and inform the design several key design criteria and considerations were identified and implemented. These are based on the design guidance set out in DMURS and the National Cycle Manual (NCM) and are as follows;

- Streets have been designed as local, access-only streets with widths of 5m, 4.8m where shared space is implemented, and with no central medians;
- A buffer/setback has been maintained around ground floor residential units to allow for balcony, private space etc.;
- In line with NCM guidance, which emphasises traffic reduction and calming before segregation or cycle lanes, streets are designed such that speeds and volumes are sufficiently low to facilitate shared carriageway between vehicles and cyclists;

The routes through the site will be delivered as shared streets and mature tree-lined paths, interwoven with footpaths and green links, to ensure a pleasant and safe environment for walking and cycling. It will not be possible for car traffic to cut through the development from Drumcondra Road to Clonliffe Road to ensure streets are as calm as possible.

Adaptability: How will the buildings cope with change?

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

The residential units have been designed in such a way that they could be amalgamated in the future, should the demand, be required for additional 2 and 3 bed units.

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

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

The residential buildings are arranged around a number of proposed public open spaces and routes throughout the site with extensive landscaping and tree planting proposed. Communal amenity spaces will be located adjacent to residential buildings and at roof level throughout the scheme.

All external spaces have a number of residential blocks overlooking them, and have public routes through them, ensuring a level of security. The landscape rationale for these spaces has been to provide a range of features to facilitate both active uses i.e. play spaces and more relaxed amenity i.e. seating areas. The design ensures privacy in the spaces but allows for passive security from adjoining blocks and entrances ensuring a sense of security.

Parking: How will the parking be secure and attractive?

Residential car parking spaces will be located at basement and below podium level and will be let separately to the apartment units and will only be available to residents as part of a leasing programme. Residential parking will be supported by mobility management policies which will limit the need for residents to lease parking spaces. Leasing the spaces will ensure they are used as efficiently as possible allowing disability, EV, and car sharing spaces to be allocated appropriately where needed.

It is proposed to provide a total of 0.3 car parking spaces per residential unit for the residential component of the site resulting in a total of 476 no. residential car parking spaces located at podium or basement level to improve the visual appeal of the site and prevent a car dominated landscape. In addition, 11 spaces will be provided at surface level for mobility impaired residents who don't have direct access to basements. That makes a total of 487 residential car parking spaces. In addition a 20 spaces are located at surface level for pay and display, car club and loading bays. This will bring the total number of car spaces to 517 for the residential portion of the masterplan, the basis of this application.

Secure cycle parking will be provided at a rate of 1.3 spaces per residential unit, above the standards set out in the DCC development plan resulting in a total of 2,098 space for the residential units in secure locations, with an additional 157 secure spaces provided for non-residential elements of the development, for instance staff working on the crèche, retail, concierge, café and other potential uses with a further 256 short stay spaces at surface level will be provided, in the form of Sheffield stands, around site for visitors to the development. This will bring the total number of cycle spaces to 2,509 for the application site.

The long stay cycle parking will be two tier stacked parking. The ceiling heights and aisle widths of the bike room have all been designed to accommodate the

dimensions illustrated. For buildings where a basement is present, cycle parking will be located underneath residential blocks and cycle lifts will be installed to aid access. Where no basement is present, cycle parking will be provided in secure rooms or covered sheds close to the building entrance.

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

The proposed design of the development has been subject to a number of pre-application consultations between the design team and the Planning Authority as well as An Bord Pleanála at Pre-Application Consultation stage. The design rationale from an urban design and architectural perspective is explained in the Design Statements prepared by HJL/OMP/ODT/MCM.

The proposal has been considered as part of the wider Masterplan for the entirety of the Holy Cross lands. This will result in a coordinated design strategy for the lands ensuring consistency in terms of layouts, materials and finishes.

Full details on the rationale for the landscaping design can be found in the Landscape Design Report and Landscape plans prepared by NMP Landscape Architects which accompanies this pre-application request.

2.6 Sustainable Urban Housing: Design Standards for New Apartments (2020)

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and updated in December 2020 (in respect of Shared Accommodation only). The guidelines update previous guidance from 2015 and note that this is done so *in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines.*

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

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

HOLY CROSS COLLEGE SHD

Statement of Consistency

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

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

The Guidelines identify Central/Accessible Urban Locations which are suited to higher density development. The subject site falls within this category as it is both a 'Site within walking distance of significant employment centre' and a 'Site within reasonable walking distance to/from high capacity urban public transport stops'. The subject site is located within walking and cycling distance of Dublin City Centre and its significant employment areas such as the IFSC. Additionally the site is a 5 minute walk from both the Drumcondra Rail Station (and also future Bus Connects Core Corridor).

This SHD Application is accompanied by a Housing Quality Assessment, prepared by HJL/OMP/ODT/MCM Architects which demonstrates the compliance of the proposed development with the relevant quantitative standards required under the Apartment Guidelines 2020.

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

Another key update in the Guidelines is the ability to reduce car parking standards. The Guidelines identify that *'in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances'*.

Considering recent national policy, the predicted mode share of the development, the low car ownership levels locally, the location of the site adjacent to alternative modes (quality bus corridor, rail, cycle infrastructure), and the proposed on-site mobility services; it is considered appropriate to provide a car parking ratio of 0.3 car spaces per unit to serve the proposed development. Alongside this, a residential cycle parking ratio of 1.3 cycle spaces per unit is proposed, this is well above the minimum of 1 cycle space per unit set out in the parking standards to account for the lower number of car parking spaces.

The Transport Assessment prepared by Systra provides a justification for this level of car and cycle parking.

2.7 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

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

The Guidelines reference NPO 13 (from the NPF) which states that *'in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected'*.

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

The proposed scheme, as set out in this SHD Application to ABP seeks to achieve greater height and density. The site's suitability for this approach is set out in detail, as considered against the Guidelines in the accompanying Planning Report. It is considered that the subject site is a prime example of the type of site anticipated in the Guidelines that can achieve increased building height and resulting increased density, on a highly accessible and large scale site in within Dublin City's urban extent.

2.8 Design Manual for Urban Roads and Streets (DMURS) (2013)

The Design Manual for Urban Roads and Streets (DMURS), was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013. It sets out design guidance and standards for constructing new and

reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The Traffic Assessment, prepared by Systra provides further detail in respect of the compliance of the proposed development with DMURS.

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

2.9 Guidelines for Planning Authorities on Childcare Facilities (2001)

A new crèche is proposed on the site to cater for the needs of the development. It has a secure adjacent play area and is located beside the main open space area within the development, as shown below.

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

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

'Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms'.

The proposed development contains a large proportion of studio and 1 bed units (71%). As per consideration set out above, we have discounted the 1 bed and studio units. As such, the proposed development comprises 471 no. 2 and 3 bed units.

Applying the standard as set out in the Childcare Facilities Guidelines for Planning Authorities (2001) of 1 facility of 20 childcare spaces for each 75 units results in a requirement for 125 No. places.

The proposed crèche is 627 sqm in size and caters for c. 125 No. children, an increase from what was proposed at pre-application stage in response to Dublin City Council's comments. We submit that this crèche will meet the needs of future residents considering: the development characteristics, namely, the unit mix; the demographic profile of the area; and, the existing and permitted provision of childcare facilities in the area which indicates there is a high level of childcare capacity.

This is set out in detail in the accompanying Childcare and Schools Assessment prepared by Brady Shipman Martin.

2.10 Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020

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

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

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

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work. The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels
- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

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

2.11 Transport Strategy for the Greater Dublin Area 2016 – 2035

The Transport Strategy for the Greater Dublin Area 2016 – 2035, as prepared by the National Transport Authority, provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA)

over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

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

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

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

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

2.12 Guidelines for Planning Authorities on ‘The Planning System and Flood Risk Management (November 2009)’

These Guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process. In accordance with the Planning System and Flood Risk Management Guidelines a Site-Specific Flood Risk Assessment (SSFRA) has been prepared for the current application by BMCE Consulting Engineers. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

This Site Specific Flood Risk Assessment for residential development at Holy Cross College was undertaken in accordance with the requirements of the “Planning System and Flood Risk Management Guidelines for Planning Authorities”, November 2009.

Based on available and recorded information, the site has not been subject to flooding in recent history. The risk of tidal flooding is considered very low as the subject site lies outside the 0.1% AEP.

The risk of fluvial flooding in the area is currently under review by the OPW. However, this risk is considered low due the site located outside the 0.1% AEP fluvial coupled with the 50% AEP tidal flood extent. In addition, the considerable

level difference between the proposed finished levels and the river bank levels in the vicinity.

The risk of flooding due to ground water ingress to the proposed development is considered low. Waterproofing construction methods and measures will be employed to prevent ingress of ground water into the basements, in the normal manner.

The risk of pluvial flooding is considered low, due to the site location and proposed measures for the development.

Based on the flood risk identification in Stage 1, the proposed development falls in Flood Zone C. Hence, the proposed development is deemed 'Appropriate' in accordance with the guidelines of the OPW's publication.

2.13 Birds and Habitats Directive – Appropriate Assessment

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

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

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

2.14 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further

HOLY CROSS COLLEGE SHD

Statement of Consistency

to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

As the proposed development is over 500 residential units and a site area of over 2 hectares, being the thresholds for mandatory EIA, an Environmental Impact Assessment Report has been prepared as part of this Strategic Housing Development Planning Application.

3 LOCAL PLANNING POLICY

This section provides an overview of consistency with Local Planning Policy which is the Dublin City Development Plan 2016-2022 as the site is within the administrative area of Dublin City Council.

3.1 Dublin City Development Plan 2016-2022

The subject site is located within the administrative area of Dublin City Council. The Dublin City Development Plan 2016-2022 sets the statutory planning policy for development within the City Boundary, having regard to national and regional plans and policies. The Development Plan provides the planning policy framework and design and development standards for development of the subject lands. These are set out as follows:

3.1.1 Core Strategy

The Development Plan sets out its overall 'Vision for the Dublin' City which is to create a more sustainable and resilient city. Within this vision the Development Plan aims to improve quality of life for all.

Section 1.2 outlines how to achieve this and the following is of relevance:

b) Social/Residential – Developing Dublin as a compact city with a network of sustainable neighbourhoods which have a range of facilities and a choice of tenure and house types, promoting social inclusion and integration of all ethnic communities.

The Core Strategy sets out 'Population and Housing Figures Based on Census Data 2011, Estimate for 2013', and Regional Planning Guidelines allocations (now superseded by the RSES).

Table A of the Core Strategy identifies a need for approximately 29,500 new residential units over the life of the Plan. Table C quantifies the area of lands zoned for residential development (4,466ha) or for a mix of uses including residential (2,043ha).

The subject site is predominantly zoned Z12 'Institutional Land (Future Development Potential)' which has the stated aim "to ensure existing environmental amenities are protected in the predominantly residential future use of these lands".

Table C of the Core Strategy includes Z12 lands. In this regard the subject Z12 zoned lands are included in Core Strategy calculations for achieving sufficient zoned lands to cater for targeted population growth. The development of the lands for residential purposes supports the achievement of Core Strategy targets.

The subject area is located in the North Central housing strategy area. The Core Strategy in the Dublin City Development Plan 2016 – 2022 (DCDP) indicates the subject lands zoned have strategic capacity in terms of housing provision for the North Central Area. The lands have been included in the residential core strategy as 'available suitable land for housing development'.

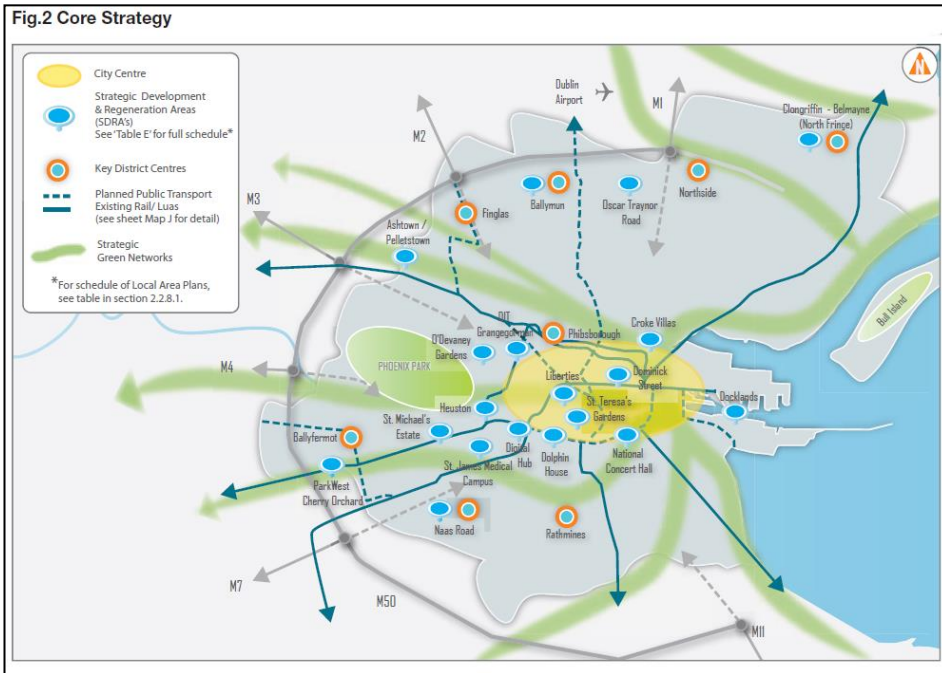


Figure x: Development Plan Core Strategy Map (Source: DCC,2020).

The Development Plan states the long-term vision and the core strategy can be translated into ‘three strongly interwoven strands’ which are as follows:

1. Compact, Quality, Green, Connected City
2. A Prosperous, Enterprising, Creative City
3. Creating Sustainable Neighbourhoods and Communities

In summary, the proposed development supports the achievement of the above vision by providing high quality residential development in proximity to public transport corridors. This development will foster a new community through its landscaped and open space strategy; mix of unit types and sizes; and provision of residential facilities; and, high quality architectural design.

3.1.2 Shape and Structure of the City

Chapter 4 relates to the future Shape and Structure of the City. It sets out the development strategy to ensure that Dublin retains and builds on its renowned urban form and character, while developing new city neighbourhoods which are well connected to their surrounding environment and to the city centre.

The Development Plan sets out the key ‘Strategic Approach’ in this regard the first of which is *the creation of a more compact city, where residents can live close to their places of work or study, and can easily traverse the city, thereby reducing urban sprawl and unsustainable travel patterns.*

In this regard Objective SC13 aims: *To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial*

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

The proposed net residential density is 202 units per hectare. The development is proximate to Drumcondra Commuter Railway Station, and to the Drumcondra Road (N2), which is a quality bus corridor (QBC) with good cycle infrastructure. There is a strong presence of community infrastructure in the locality, with multiple community centres and large scale parks within walking and cycling distance (for further detail see Community and Social Infrastructure Audit prepared by BSM). The site is adjacent to Drumcondra which has multiple shops, restaurants and other facilities.

The proposal exhibits high quality neighbourhood urban design and excellent architecture and landscape design. The wider area provides extensive community facilities as detailed in the Community and Social Infrastructure Audit; and the Childcare School Demand Assessment Report prepared by BSM.

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

The apartment blocks vary in types, sizes, length and height creating a sense of place, visual interest and variety. The block heights range from 3 storey to 18 storeys. The units are a mix of 1, 2 and 3 bed types. The elevations alternate between floors creating further variation in the units.

Objective SC15 aims: To recognise and promote green infrastructure and landscape as an integral part of the form and structure of the city, including streets and public places.

To boost biodiversity, green roofs are proposed to the apartment blocks and Sustainable Urban Drainage Systems will be used throughout the scheme. A master planning context and landscape strategy has been described, which promotes protection of natural heritage and integration into the Green Network. The landscape Masterplan provides for a series of high quality landscaped spaces and green infrastructure network supporting DCC's Green Infrastructure Network. In particular the proposed development maintains a set back from the Tolka and away from the Z9 zoning preserving its integrity.

3.1.3 Residential Development

The Development Plan identifies that the provision of quality homes which provide for the needs of the city's population and which contribute to the making

of good, connected neighbourhoods as a key priority. In this regard it is the policy of DCC:

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

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

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

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

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

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

The proposed scheme provides for high quality residential accommodation close to the City Centre and adjacent to a key public transport corridor. The site provides well designed external spaces for both residents and visitors to the site, with a wide range of facilities in the tenant amenities, high quality open space, pedestrian and cyclist connections through the site.

3.1.4 Movement and Transport

Chapter 8 of the Development Plan relates to Movement and Transport within the City. It sets out the development strategy to ensure the optimum use of existing and proposed transport infrastructure.

Objective MT2 states: *Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in the NTA's draft transport strategy are key elements of this approach.*

Objective MT13 aims: *To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.*

Objective MT17 aims: *To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.*

Objective MTO23 aims: *To require Travel Plans and Transport Assessments for all relevant new developments and/or extensions or alterations to existing developments, as outlined in Appendix 4.*

Demonstration of compliance with these objectives is set out in the Transport Assessment and Mobility Management Plan prepared by Systra.

Objective MTO45 aims: *To implement best practice in road design as contained in statutory guidance and in the DMURS (the use of which is mandatory) with a focus on place-making and permeability (for example, by avoiding long walls alongside roads) in order to create street layouts that are suited to all users, including pedestrians and cyclists.*

Roads are designed in accordance with DMURS which is set out in the Transport Assessment prepared by Systra.

3.1.5 Green Infrastructure, Open Space & Recreation

Chapter 8 of the Development Plan relates to Green Infrastructure, Open Space & Recreation. It aims to protect and enhance open spaces for both biodiversity and recreational use for benefit of the city's sustainability and attractiveness as a place to live, work and visit.

Objective GI2 states: *That any plan/project, either individually or in combination with other plans or projects that has the potential to give rise to significant effect on the integrity of any European site(s), shall be subject to an appropriate assessment in accordance with Article 6(3) and 6(4) of the EU Habitats Directives.*

HOLY CROSS COLLEGE SHD

Statement of Consistency

An Appropriate Assessment will be carried out by An Bord Pleanála as the competent authority. To facilitate this the application is accompanied by a Preliminary Appropriate Assessment Screening Report prepared by BSM.

Objective GI5 aims: *To promote permeability through our green infrastructure for pedestrians and cyclists.*

The landscape strategy, prepared by NMP, provides a network of footpaths throughout the development that connect to the adjoining parklands. This is set out further in the Landscape Design Report.

Objective GIO1 aims: *To integrate Green Infrastructure solutions into new developments and as part of the development of a Green Infrastructure Strategy for the city.*

Please refer to separate BMCE Infrastructure Design Report which describes the Green Infrastructure to be incorporated into the drainage strategy for the proposed development.

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

The compliance with the subject site's zoning is set out in detail in Section 7.3 of the Planning Report, however in regard to the Green Infrastructure Strategy the following is of relevance.

The Development Plan states *In particular, the masterplan will need to identify the strategy for the provision of the 20% public open space requirements associated with any residential development, to ensure a co-ordinated approach to the creation of high-quality new public open space on new lands linked to the green network and/or other lands, where possible.* The proposed development includes for 25% of the development site area set out as public open space, that it is proposed to be made available to the public through the Taking In Charge of the area by Dublin City Council.

The proposed scheme also includes for extensive open space provision for residents which includes play facilities.

Objective GI23 aims: *To protect flora, fauna and habitats, which have been identified by Articles 10 and 12 of Habitats Directive, Birds Directive, Wildlife Acts 1976 – 2012, the Flora (Protection) Order 2015 S.I No. 356 of 2015, European Communities (Birds and Natural Habitats) Regulations 2011 to 2015.*

Please refer to separate Preliminary Appropriate Assessment Screening Report prepared by BSM.

The Tolka

The River Tolka is located in close proximity to the site and within the wider masterplan lands.

The Development Plan sets out the following objectives to protect watercourses within its administrative area:

GI15: To protect, maintain, and enhance the natural and organic character of the watercourses in the city, including opening up to daylight where safe and feasible. The creation and/or enhancement of riparian buffer zones will be required where possible. It is the policy of Dublin City Council to maintain and enhance the safety of the public in its use and enjoyment of the many public parks, open spaces, waterways and linkages within the city, including the River Dodder between Ringsend and Orwell (Waldron's) bridge, and at the area known as Scully's Field between Clonskeagh and Milltown.

GI16: To protect and improve the unique natural character and ecological value of all rivers within and forming boundaries to the administrative area of Dublin City Council, in accordance with the Eastern River Basin District management plan.

GIO18: To protect and improve the natural character of watercourses, including the Dodder, and to promote access, walkways, cycleways and other compatible recreational uses along them, having regard to environmental sensitivities.

GIO20: To establish, where feasible, river corridors, free from development, along all significant watercourses in the city.

We note, the Tolka is referred to as part of the Strategic Green Network within Section 10.5.1 of the Development Plan (Fig.14 Strategic Green Network) as 'a green corridor'. The Strategic green network comprises river/canal corridors and open/ institutional lands which can contribute to the built and natural landscape of the city.

'c) Corridors are vital to maintain connectivity in the landscape and provide for animal movement, seed and pollen dispersal, and plant migration.'

The proposed development and the wider strategy for the masterplan plan lands identifies an enhanced river walkway along the Tolka. The proposed scheme provides for access to the river however the formal walkway is provided by the wider masterplan lands and future applications.

Please see Landscape Report and associated drawings prepared by NMP Architects for further detail of this strategy.

3.1.6 Height

The Development Plan Height Strategy identifies a building height of 16 m for residential development in this location as the site is location in the 'outer city' which include principally areas outside the canal ring as this is considered a 'Low-rise area'.

While the site is located within 400m of the Drumcondra Commuter Train Station, which, as a Rail Hub, the Development Plan specifies building (commercial and residential) up to 24m are permissible in principle, under the Development Plan the proposed development exceeds this standard.

The proposed building heights across the site vary between 2 and 18 storeys. It is submitted that the rationale for increased height at this location goes beyond the specific height limits set out in the Development Plan and should be considered in the context of the wider height policies of the Development Plan, Government policy, and the site context.

The Urban Building Height Guidelines establish the principle for the re-examination of the height limits (as outlined in Section 2.1.7) and that these take precedence over the Development Plan height limits on a context basis. Considering the above we have prepared a Statement of Material Contravention which details the justification for the proposed height, *inter alia*.

Please see Statement of Material Contravention and Planning Report prepared by BSM and Design Statements prepared by HJL/OMP/ODT/MCM Architects for detail rationale in relation to proposed height.

3.1.7 Residential Development Standards- Apartments

Section 16.10.1 of the Dublin City Development Plan 2016 – 2022 sets out the standards for apartments which are based upon the apartment standards set out in the Department of Environment, Community and Local Government Guidelines entitled Sustainable Urban Housing; Design Standards for New Apartments – Guidelines for Planning Authorities (December 2015). These are in parts superseded by the Updated Guidelines of 2018 (as outlined earlier in this document).

The Housing Quality Assessment, prepared by HJL/OMP/ODT/MCM Architects submitted with this Pre-Application Consultation Request, as well as the Planning Report, sets out detailed compliance with the guidelines for apartment standards.

3.1.8 Part V – Social Housing

The City Development Plan identifies as a policy:

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

The proposed scheme has been designed in a manner to ensure an appropriate mix and location of Part V units. The Part V units are identified and proposed to

be incorporated into Blocks A2 and A3 in the northern section of the scheme proximate to Drumcondra Road.

It is proposed to develop 1614 no. units at the site and the Applicant proposes 160 no. Part V units which relates to the total number of units in Blocks A2 and A3. It is hereby stated that CWTC Multi Family ICAV acting on behalf of its sub-fund DBTR DR1 Fund are committed to providing the full requirement under their Part V obligations.

The applicant has engaged with Dublin City Council as part of the pre-planning and letter from Dublin City Council is included as part of the Part V pack in this regard.

4 CONCLUSION

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

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

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

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

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and that the proposal as presented constitutes a reasonable basis for an application.