

STRATEGIC HOUSING DEVELOPMENT  
PLANNING APPLICATION  
**PLANNING REPORT**

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

**BSM**

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**Brady Shipman  
Martin**

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

Date  
**July 2021**

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## 1 INTRODUCTION

This Planning Report has been prepared in support of a SHD Application to An Bord Pleanála, on behalf of CWTC Multi Family ICAV acting on behalf of its sub-fund DBTR DR1 Fund. The subject application site (hereafter called 'the site') is located at Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9. It is a site of approx. 8.9 hectares, with a site development area of c. 8 hectares.

The site is bound by Drumcondra Road Lower, Mater Dei College and the Archbishops House (a Protected Structure) to the West, Clonliffe Road to the South, Cornmill Apartments and Belvedere College Rugby Grounds to the East and by the Tolka River to the North.

This application falls under the definition of Strategic Housing Development as set out under Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 as it is a proposed development '*of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses*'.

The lands are predominately 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*". The use of these lands for residential purposes is provided in the Core Strategy with regards to the availability of land to deliver residential development. A small portion of the site, to the north adjacent the Tolka River is zoned Z9- *Amenity/Open Space Lands/Green Network* however no residential development is proposed on these lands.

This Planning Report, in addition to a Statement of Consistency with Planning Policy, accompanies the Strategic Housing Development Application.

The development for which permission is sought is, as set out in the Statutory Notices:

*The development will consist of:*

- 1. Demolition of a number of existing office/former college buildings on site, including the New Wing and Library Wing Buildings, (c. 6,130 sq.m) and the construction of a residential development with a gross floor area of c. 119,459 sq.m (excluding basement parking areas) set out in 12 no. residential blocks, ranging in height from 2 to 18 storeys to accommodate 1,614 no. Build to Rent apartments with associated residential tenant amenity, 1 no. retail unit, 1 no. café, and a crèche. The site will accommodate a total of 508 no. car parking spaces and 2,507 no. bicycle parking spaces in three separate*

basement/podium areas and at surface level. Landscaping will include extensive new public open spaces and communal courtyards, podiums and roof terraces.

2. *The 12 no. residential buildings range in height from 2 storeys to 18 storeys, accommodating 1,614 no. Build To Rent apartments comprising 540 studios, 603 no. 1 bed units, 418 no. 2 bed units and 53 no. 3 bed units. The breakdown of residential accommodation is as follows:*
  - *Block A1 is a 4 to 8 storey building, including setbacks, balconies and terraces, accommodating 305 no. units;*
  - *Block A2 is a 7 storey building, including setbacks and balconies, accommodating 73 no. units;*
  - *Block A3 is an 8 storey building, including setbacks and balconies, accommodating 87 no. units;*
  - *Block A4 is a 6 to 13 storey building, including setbacks, balconies and terraces, accommodating 104 no. units;*
  - *Block B1 is a 5 to 6 storey building, including setbacks and balconies, accommodating 92 no. units;*
  - *Block B2 is a 6 to 8 storey building, including setbacks and balconies, accommodating 137 no. units;*
  - *Block B3 is a 5 to 6 storey building, including setbacks and balconies, accommodating 80 no. units;*
  - *Block C1 is a 6 to 8 storey building, including setbacks and balconies, accommodating 146 no. units;*
  - *Block C2 is a 5 to 7 storey building, including setbacks and balconies, accommodating 96 no. units;*
  - *Block D1 is an 18 storey building, including setbacks, balconies and terraces, accommodating 151 no. units;*
  - *Block D2 is an 4 to 8 storey building, including setbacks and balconies, accommodating 239 no. units;*
  - *The Seminary Building and South Link Building (E1&E2) are existing Protected Structures of 2 to 4 storeys with a proposed 5 storey extension to the rear of the Seminary Building and conversion of both buildings to accommodate 104 no. residential units including balconies; and*
  - *Residential Tenant Amenity Space is provided throughout the existing and proposed blocks totalling c.3,463 sq.m and Communal External Amenity Space is provided adjacent each Block and at roof level on Blocks A1, A4, and D2, totalling c.13,729 sq.m.*
  
3. *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 (these are not included in the application boundary and no works are proposed to these Protected Structures with the exception of the proposed works to the Drumcondra Rd boundary wall which is listed under the*

*Protected Structure of the Archbishop's House as noted below). The works to the Protected Structures within the application site are set out as follows:*

- *The Seminary Building (RPS Ref 1901): The works consist of the careful refurbishment and alteration of the existing four storey Seminary Building to provide residential accommodation, with the addition of a new five storey residential block to the rere (West elevation); floor levels carry through on the four lower levels. It is proposed that the existing structure, the Library Wing, on the northern elevation of the Seminary and the connecting corridors to the Seminary will be demolished; new infill concrete walls are located to fill the gap where elements are removed. Materials that can be salvaged from these blocks will be surveyed, their location noted, and re-used in the conservation and restoration works in The Seminary Building. The projecting WC blocks to the rere (west) elevation of The Seminary Building are also proposed to be demolished. The external envelope of The Seminary Building, with existing chimneys, stone and render finishes, windows and doors is maintained and re-used; the stone cross from the pediment is removed and built into a wall in the new residential block which forms an extension to the existing Seminary Building. Selected window opes on the lateral North and South elevations are lowered from door opes to provide for balcony access. The scheme proposes 56 no. apartments installed within the existing shell on the East side of a corridor running along the rere of the plan; the 48 no. apartments in the new block are linked to this corridor through a number of the window opes of the rere elevation which are lowered to ground level. Lightwells, lifts and staircases are also accessed in this way.*
- *The South Link Building (RPS Ref 1901): The South Link Building consists of a two- storey stone and render block with slate roof and bellcote between Holy Cross Chapel and the The Seminary Building; this building will be conserved and restored. Alterations to the South Link Building include the insertion of a new doorway within the existing front (Eastern) façade to link the front of the building to the cloister garden, and the insertion of two no apartments in the ground and first floor space. The existing organ at first floor level will be moved to a new location within the Holy Cross Chapel.*
- *Holy Cross Chapel (RPS Ref 1901): Holy Cross Chapel is retained and restored as a tenant amenity space. External alterations include a new metal door and ramp to the South elevation; interior alterations are limited to services and decoration; a section of the existing tiled floor will be lifted to allow for service connections to furniture installations. The following items will be moved from the Chapel as a part of the works: Main altar, 2 no. side altars, 2. no paintings to either side of chancel arch, Stations of the Cross, 2 no. marble statues to narthex, Loose pews, Confessional, Fixed furniture to sacristy. Method statements for these works are included in the application documents.*

- *The Assembly Hall (RPS Ref 1901): The Assembly Hall comprises a two- storey hall with its front façade, steps and projecting porch orientated towards Clonliffe Road. The building is conserved and restored as a tenant amenity space as a part of the proposal; the existing balcony level within the main space is removed. The existing stage area is also removed to provide a gym area; bicycle storage is provided within the envelope to the North-West. Existing doors and windows are retained and repaired. A new window is provided into the cloister, with smaller secondary opes cut between spaces.*
  - *The Ambulatory (RPS Ref 1901): All of the above referenced buildings are linked by a cloister colonnade (i.e. the Ambulatory) around two sides of a central garden; there is a part section of the colonnade on the North side and an indented (enclosed) section directly outside Holy Cross Chapel; the fourth (east) side is completed by the rere elevation of The Seminary Building. The Ambulatory will be retained as part of the proposed development. The cloister garden will be restored and conserved as a part of the project for circulation and amenity use. Mosaic panels to the cloister will be retained and covered to supply a base for a removable light fitting. The courtyard garden will be re-designed and re-planted as a part of the scheme.*
  - *Drumcondra Rd Boundary Wall Entrance (Listed under Archbishop's House RPS 2361): The existing entrance gates and the adjoining walls are part of the Archbishop's House Protected Structure. It is proposed to take down the existing stone gate pier to the south, and reconstruct this pier in a new location further to the south, widening the gate opening in this location. This will involve the taking down of a small portion of the stone boundary wall.*
4. *Extensive areas of public open space of c.20,410 sq.m or 25% of the site is provided for, including woodland walk, formal lawn seminary garden, dog park and, playground. The proposed landscaping scheme provides for the removal of some existing trees on the site as well as extensive new planting.*
  5. *Non-residential uses include a crèche of c. 627 sq.m and 1 no. retail unit of c. 329 sq.m in Block A4, and 1 no. café unit of c.273 sq.m in Block D1. Total gross floor area of proposed other uses is 1,229 sq.m.*
  6. *The development will include a single level basement under Blocks B2, B3 & C1, containing 158 car spaces, 582 cycle parking spaces, plant, storage areas, waste storage areas and other associated facilities, a single level basement under Block D2 containing 86 car spaces, 528 cycle parking spaces, plant, storage areas, waste storage areas and other associated facilities and a part podium level basement, part single level basement under Block A1, containing 233 car spaces, 500 cycle parking spaces, plant, storage areas, waste storage areas and other associated facilities. The remainder of residents bicycle stores, totalling 645 spaces, are located proximate to residential buildings. In addition 31 no. parking spaces are located at surface level to include visitor, accessible, EV, car club and loading spaces as well as 252 no. short stay bicycle parking spaces.*

7. *The site is accessed by vehicles, cyclists and pedestrians from a widened existing entrance on Clonliffe Road, at the junction with Jones's Road, and through the opening up of an existing access point on Drumcondra Road Lower at the junction with Hollybank Road to act as a left in/left out access. No through route for vehicular access through the site for the public is proposed. 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 pitches and clubhouse to the north of the site and to a permitted hotel on Clonliffe Road (DCC Reg. Ref.: 2935/20, ABP Reg. Ref.: PL29N.30819).*
8. *The proposed application includes all site landscaping works, green roofs, boundary treatments, lighting, servicing, signage, ESB Substations, PV panels at roof level on all residential blocks except E1/E2 and D2, and associated and ancillary works, including site development works above and below ground.*

This report examines the site location, context, and planning history. It also has regard to issues of compliance with the Dublin City Development Plan 2016-2022, and Section 28 Guidelines, which are the relevant statutory documents against which the development will be considered.

This SHD planning application is accompanied by a comprehensive set of documentation which specifically seeks to address the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning and Development (Strategic Housing Development) Regulations 2017 and the requirements of the Dublin City Development Plan 2016-2022.

An Environmental Impact Assessment Report (EIAR), which also constitutes an Environmental Impact Statement (EIS) as required under the Planning and Development Regulations, 2001 (as amended), is submitted to An Bord Pleanala with the planning application.

An Information for Appropriate Assessment Screening is submitted to An Bord Pleanala with the planning application prepared by Brady Shipman Martin that accompanies this application which concludes that no likely significant impacts on Natura 2000 sites are predicted.

This Planning Report should be read in conjunction with the other documentation (reports and drawings) accompanying this SHD planning application, set out in the schedule included in the Cover Letter to An Bord Pleanala.

We confirm that prior to making this planning application the drawings enclosed herewith have been checked with reference to the Planning and Development Regulations, 2001-2021.

## 2 SITE LOCATION AND CONTEXT

### 2.1 Site Location

The full Masterplan lands is c.12 hectares and the application site is approximately 8.9 ha in size and located 1.7 km north of Dublin City Centre. The site is bounded by Drumcondra Road Lower, Mater Dei College and the Archbishops House (a Protected Structure) to the West, Clonliffe Road to the South, Cornmill Apartments and Belvedere College Rugby Grounds to the East and by former playing pitches and the Tolka River to the North.

The surrounding area is comprises a mix of uses, including: light industrial and warehousing to the north; residential areas to the south, west and east at along Clonliffe Road and Drumcondra Road; and, the sports facilities directly east and to the north beyond the River Tolka is Tolka Park Football Stadium.

The site comprises a number of greenspaces and existing large institutional buildings (approx. 11,865sqm) associated with its current use (some of which are protected structures). The site as many large mature trees giving it a unique character apart from the nearby busy roads.

The northern portion of the site is set back from the busy Drumcondra road, separated by large mature trees. While the southern part of the site fronts onto Clonliffe Road.

The site sits between the established residential communities of Drumcondra to the west and north and Clonliffe Road and Ballybough to the South and East. Both are established, mature suburbs of Dublin City with the surrounding area predominately developed. The immediate area gives access to a range of public facilities including community centres, healthcare, libraries, shops and sports / recreation facilities.

The site is approximately 400m from Drumcondra Commuter Railway Station to the south west, and adjacent to Drumcondra Road, which is a quality bus corridor (QBC) that 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).

### 2.2 Wider Site Ownership Context

The Holy Cross College Lands were acquired by the Archdiocese in 1859, college facilities were developed and they housed a seminary for the Catholic Church in Ireland and administration offices for the Archdiocese and various diocesan activities. The seminary ceased operation in year 2000 but the buildings still accommodate administration offices for the Archdiocese, the various diocesan

activities and offices for some charitable organisations (Crosscare and DePaul). These activities are vacating the properties.

The Archdiocese has since entered into an agreement with Cumann Lúthchleas Gael / the Gaelic Athletic Association to acquire these lands and who have subsequently entered into an agreement to onward sell these to Hines Real Estate Ireland (through the applicant CWTC Multi Family ICAV acting on behalf of its sub-fund DBTR DR1 Fund). The Archdiocese will retain the Archbishop's Residence and surrounding lands and lands in the south-west corner of the Holy Cross College property, which includes the Mater Dei building, a Family Hub, and a large surface car park. These lands are included in the Masterplan,

The Red House (Dublin City Council Registered Protected Structure Reference Number 1902 and Recorded Monument Ref. No. 018-019) and curtilage is owned by Páirc an Chrócaigh Teoranta Cuideachta Faoi Theorainn Ráthaíochta / Cumann Lúthchleas Gael (Gaelic Athletic Association (GAA)) as well as the land at the south eastern corner of the Holy Cross College lands which has been subject to an approval by An Bord Pleanála for a 2 to 7 storey 200 room hotel. The land parcel to the north of the Holy Cross College lands, former grass playing pitches, are operated by the GAA and are due to be formally acquired by the GAA from the Archdiocese of Dublin.

The GAA plans to build two playing pitches on this land parcel, with a club house and carpark. The proposed A and B Blocks and plots, associated road and pathways networks and supporting infrastructure have been carefully designed and laid out to facilitate the development of the proposed playing pitches and associated facilities, subject to a separate planning application by the GAA in due course.

The development proposed also allows for the potential future vehicular access to the playing pitches from the Drumcondra Road Lower access point, in order to facilitate the potential for the GAA to accommodate car parking on the playing pitches on occasion during key match day events. Entry would be provided from the proposed housing development's access point in the north west corner of the lands, off Drumcondra Road Lower. Cars would enter via the Drumcondra Road Lower access and exit on the Clonliffe Road access point. Planning permission for the parking of vehicles on this part of the site is not included for nor sought under this planning application – and is a matter for the GAA to pursue in due course.

The GAA has been consulted in relation to the proposed housing development's water supply and drainage infrastructure to ensure that the infrastructure does not prejudice future development potential of the GAA lands. The same applies to electricity infrastructure on the site, which has been carefully considered with

the GAA to ensure that the infrastructure will facilitate the GAA developments at a later date.

As noted above the Red House and its curtilage are owned by the GAA and does not form part of the proposed housing development, other in respect of proposed adjacent landscaping. Its setting and curtilage need to be preserved in line with its protected structure status. The Red House was the original Holy Cross College before it was relocated to the Seminary Building. The historic affiliation between these buildings means a visual connection needs to be preserved. The proposed housing development, and orientation of the adjoining B and D Blocks and plots, retains this visual connection of these buildings and enhances both the Seminary and front central lawn in this location. The proposed development will retain the existing circulation route on the site that includes the entrance to the Red House. Views to this protected structure and its architectural heritage will therefore be maintained.

The proposed 2 to 7 storey 200 room hotel, and associated facilities, services and works, on the GAA owned land in the south eastern corner of the Holy Cross College lands recently received planning permission, from An Bord Pleanála. The proposed housing development site includes a strip of land towards the eastern boundary of the proposed hotel lands. There is a watermain proposed along this boundary that will connect to the trunk watermain which runs along Clonliffe Road. Connections to both the proposed hotel and the housing development will be provided from this watermain connection. There are also electrical and telecommunication cabling proposed to run along this boundary for the proposed housing development that the hotel could connect to.

### 3 PLANNING HISTORY

The application site and the wider masterplan site, have been subject to a number of planning applications in recent years which primarily relate to the normal function and operation of its institutional uses.

We note the following applications associated with the subject site which relate to the existing institutional use of the lands:

Reg. Ref.	Description	Decision
2935/20 ABP Ref: PL29N.308193	PROTECTED STRUCTURE: The subject site encompasses an area of 0.51 hectares. The development will consist of: the construction of a part -2 to part -7 storey 8,485 sq.m. hotel building comprising 200 - bedrooms arranged over floors 1-6.	Granted by ABP on 8 <sup>th</sup> April 2021

2361/16	PROTECTED STRUCTURE: Permission sought for the demolition of one disused single storey bungalow, 81 sq. metres, at this site located at Clonliffe Road, Dublin 3. The bungalow is within the curtilage of Clonliffe College, a Protected Structure.	Granted 14-Apr-2016
2607/11	PROTECTED STRUCTURE - Planning permission for external safety & health works within the curtilage of "The Assembly Hall" (a protected structure), comprising:- (1) Removal of existing external lecture theatre escape stairs and replacement with new stairs, walkway, handrails & guarding (2) Removal & replacement of balustrading/guarding to existing external rear stairs and area. (3) Construction of new rear pedestrian emergency exit gate and replacement of existing rear vehicular delivery gates. (4) Addition of 3no. handrails to front external approach steps.	Granted 17-Jun-2011
3032/10	PROTECTED STRUCTURE - Change of use of the ground floor of the northerly wing (377sqm) of the Diocesan Offices building from educational use to office use. The building is located within the curtilage of protected structures.	Granted 06-Aug-2010
2947/10	PROTECTED STRUCTURE- Planning permission for external health and safety works within the curtilage of 'The Assembly Hall' (a protected structure), comprising:- (1) Removal and replacement of existing external Lecture Theatre escape stairs, handrails and guarding. (2) Removal and replacement of balustrading/guarding to existing external rear stairs and area. (3) Addition of 3no. handrails to front external approach steps.	Granted 28-Jul-2010
1652/06	Application by the Board of Management of Mater Dei Institute Of Education for planning permission for addition of a new mezzanine floor within The Assembly Hall; (a protected structure), for formation of 3 no. study rooms, for 2 no. new stairs, and for associated fire safety, partitioning, and other works - all at 204/206, Clonliffe Road, Dublin 3. These works do not involve any alterations to the exterior of the building.	Granted 12-Apr-2006

## 4 PRE-PLANNING CONSULTATION

Both the context and approach to the application site and the design rationale for the proposed development, have been subject to considerable consultation with the Dublin City Council Planning Department under Section 247.

A series of meetings have been held with the City Council's Planning Department as formal pre-application discussions on the substance of the proposed development, on the following dates:

- 4<sup>th</sup> February 2020- Mary Conway (Deputy City Planner)- Joint Meeting with representative of the GAA and the Archdiocese
- 5<sup>th</sup> May 2020- Mary Conway (Deputy City Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 22<sup>nd</sup> May 2020- Mary Conway (Deputy City Planner), Deirdre O'Reilly (Senior Planner)
- 16<sup>th</sup> June 2020- Mary Conway (Deputy City Planner), Deirdre O'Reilly (Senior Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 29<sup>th</sup> June 2020- Mary Conway (Deputy City Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 9<sup>th</sup> July 2020- Mary Conway (Deputy City Planner), Deirdre O'Reilly (Senior Planner)
- 14<sup>th</sup> July 2020- Mary Conway (Deputy City Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 22<sup>nd</sup> July 2020- Mary Conway (Deputy City Planner), Deirdre O'Reilly (Senior Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 4<sup>th</sup> August 2020- Mary Conway (Deputy City Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 18<sup>th</sup> August 2020- Mary Conway (Deputy City Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 31<sup>st</sup> August 2020- Mary Conway (Deputy City Planner), Deirdre O'Reilly (Senior Planner)
- 1<sup>st</sup> September 2020- Mary Conway (Deputy City Planner), Mary McDonald (Executive Architectural Conservation Officer)
- 7<sup>th</sup> October 2020- Mary Conway (Deputy City Planner), Kieran O'Neill (Senior Executive Landscape Architect)
- 13<sup>th</sup> October 2020- Mary Conway (Deputy City Planner), Deirdre O'Reilly (Senior Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)
- 22<sup>nd</sup> October 2020- Mary Conway (Deputy City Planner), Deirdre O'Reilly (Senior Planner)

## HOLY CROSS COLLEE SHD

### Planning Report

- 9<sup>th</sup> March 2021- Mary Conway (Deputy City Planner), Garrett Hughes (Senior Planner), Audrey Taylor (Executive Planner), Mary McDonald (Senior Executive Architectural Conservation Officer-Acting)

Discussions on the proposed development have also taken place with the Council's Conservation Department, Traffic & Transportation Department and the Parks Department.

In addition Tri Partite Meeting took place with An Bord Pleanala and Dublin City Council on 18<sup>th</sup> January 2021.

## 5 PLANNING FRAMEWORK

The planning policy and context for the proposed scheme is established in national and local policy. These are considered in the Statement of Consistency with this section of the Planning Report outlining the key elements of the specific local planning policy established in the Dublin City Development Plan 2016-2022.

### 5.1 Dublin City Development Plan 2016-2022

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

The proposed development supports the achievement of DCC Development Plan objectives in a number of key areas which are discussed below. Further, compliance with County, Regional and National policy are detailed within the enclosed Statement of Consistency prepared by BSM which should be read in conjunction to this Planning Report.

#### 5.1.1 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).

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’.

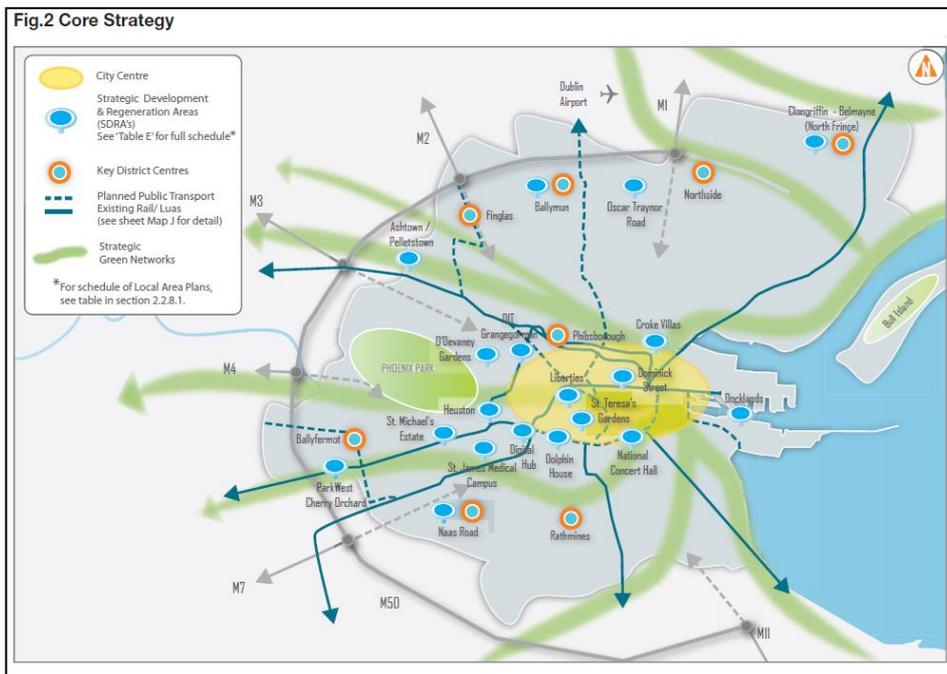


Figure 5.1: Development Plan Core Strategy Map (Source: DCC,2020).

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

Overall the proposed development has had careful regard to the policies and objectives contained within the Development Plan. In particular the proposed development supports the achievement of Objective SC13:

*SC13: To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in*

*Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.*

The design, layout and open space will result in a high quality community and residential environment. Communal facilities have been included within the proposed development to serve future residents.

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.

### **Residential Development**

Similarly Chapter 5 of the Development Plan relates to Quality Housing Objectives. In particular the QH6 & QH7 aim to:

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

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

The Development Plan 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 to apartments, the DCC policies are 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.*

**SN1:** *To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this plan.*

The scheme as proposed introduces a mix of residential unit types and sizes to an existing and established residential neighbourhood of the City. A Housing Needs Assessment and Unit Mix Analysis as well as a Social & Community Infrastructure Audit has been prepared to demonstrate how the proposed scheme integrates to the existing residential profile of the area and existing social and community infrastructure.

### 5.1.2 Land Use Zoning

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

The area immediately adjacent to the River Tolka, abutting and partly within the site, is zoned Z9 *"recreational amenity / open space / green networks"*, and the most north-westerly corner of the site is zoned Z1 Residential. The River Tolka corridor is a 'Conservation Area' with objectives to deliver a linear park along it.

No residential development is proposed within the Z9 zoning in compliance with the requirements of Strategic Housing Development Applications.

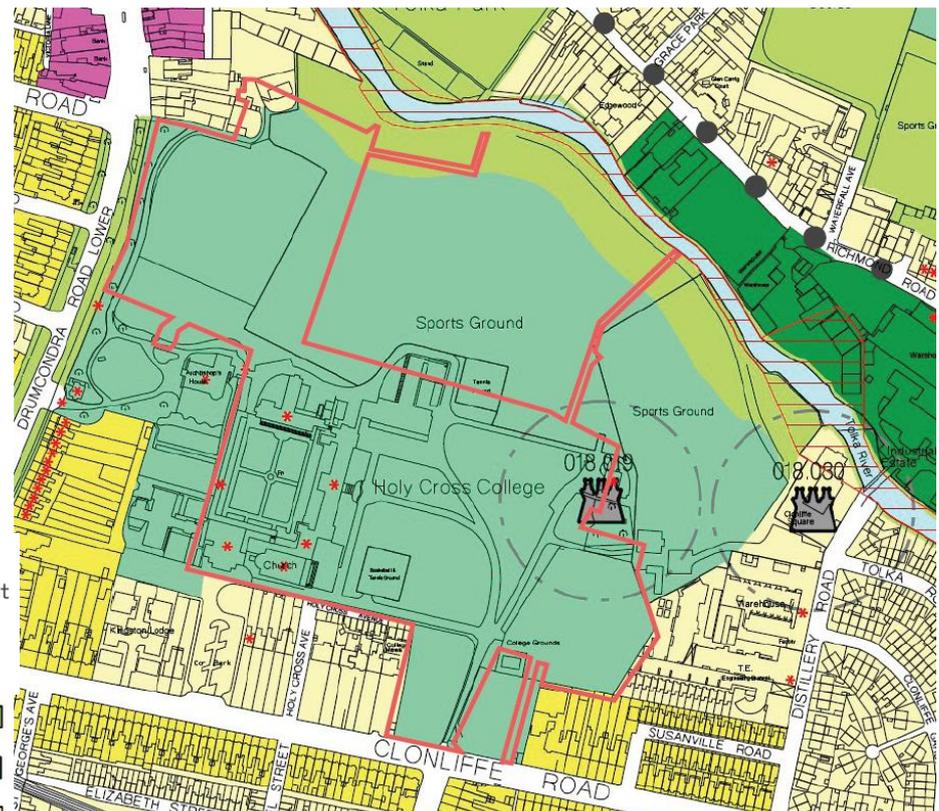


Figure 5.2: extract from DCC Zoning Map E (Indicative Red Line) (Source: DCC)

**Permissible uses and open for consideration uses on Z12 lands include:**

<b>Permissible Uses</b>	<i>Bed and breakfast, buildings for the health, safety and welfare of the public; caravan park/camp site (holiday), childcare facility, community facility, conference centre, cultural/recreational building and uses, education, embassy residential, enterprise centre, garden centre, golf course and clubhouse, guest house, halting site, home-based economic activity, hostel, hotel, live-work units, media associated uses, medical and related consultants, open space, place of public worship, public service installation, residential institution, residential, restaurant, science and technology-based industry, shop (local), training centre.</i>
<b>Open for Consideration Uses</b>	<i>Boarding kennel, car park, civic and amenity/ recycling centre, funeral home, industry (light), municipal golf course, nightclub, office, outdoor poster advertising, part off-licence, public house, shop (neighbourhood).</i>

The Development Plan identifies specific considerations for the development of Z12 lands which makes reference to a masterplan as follows:

*'In considering any proposal for development on lands subject to zoning objective Z12, other than development directly related to the existing community and institutional uses, Dublin City Council will require the preparation and submission*

*of a masterplan setting out a clear vision for the future for the development of the entire land holding.*

*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 Development Plan identifies a number of specific requirements arising from the Z12 zoning objective. These include:

- *a minimum of 20% of the site, incorporating landscape features and the essential open character of the site, to be retained as accessible public open space;*
- *the preparation and submission of a masterplan setting out a clear vision for the future for the development of the entire land holding. 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 minimum 20% public open space shall not be split up into sections and shall be comprised of soft landscape suitable for relaxation and children's play, unless the incorporation of existing significant landscape features and the particular recreational or nature conservation requirements of the site and area dictate that the 20% minimum public open space shall be apportioned otherwise;*
- *development at the perimeter of the Z12 sites adjacent to existing residential development shall have regard to the prevailing height of existing residential development and to standards in Chapter 16, Section 16.10 of the Development Plan pertaining to aspect, natural lighting, sunlight, layout and private open space;*
- *the 10% social housing requirement shall apply.*

In response to the above considerations a Schematic Masterplan has been prepared by HJL included with this application, and addresses the provisions of the Z12 Zoning Objective and which are outlined in detail in Section 7.3 below.

## 6 SCHEMATIC MASTERPLAN FOR WIDER HOLY CROSS LANDS

A Schematic Masterplan, which has been prepared on behalf of Hines and the GAA, has been prepared relating respect all of the Clonliffe Lands that are subject to the Z12 zoning. The Schematic Masterplan describes the future strategic vision and structure for the redevelopment of lands. The Development Plan requires a single Masterplan vision for the use of the lands within the area subject to the zoning, irrespective of the current ownership structure.

The Schematic Masterplan represents the intentions of the main institutional stakeholder of the lands, working in co-operation with the other landowners within the subject Z12 area and with Dublin City Council to deliver a vision for the integrated and sustainable development of the lands, while retaining the main institutional use in an enhanced condition and setting.

The Schematic Masterplan lands include lands which are currently or in the future will be in the control of Hines, the GAA and the Archdiocese in addition lands in the ownership of Belvedere College are identified as they form part of the Z12 Zoning but are not subject to change in the Masterplan.



Figure 6.1: Schematic Masterplan Lands in the context of DCC Zonings

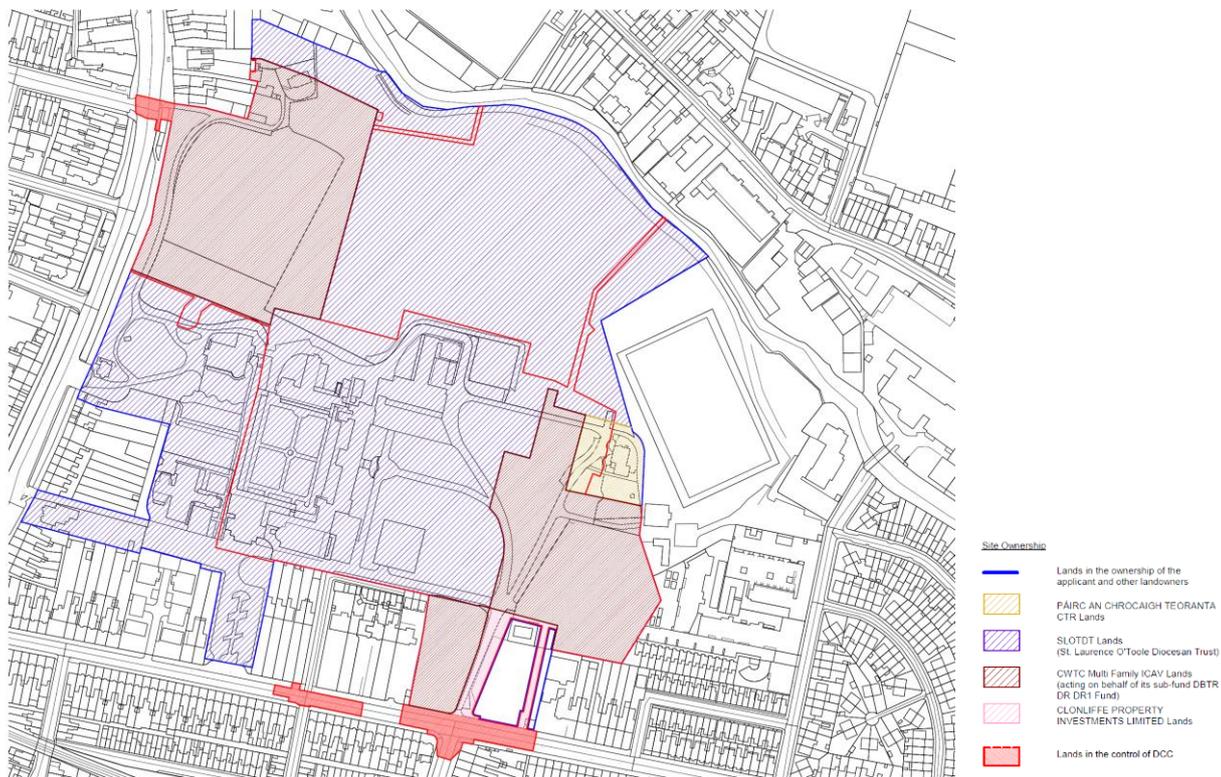


Figure 6.2: Schematic Masterplan Lands & Site Interest

To the north of the site is a small portion of Z1 Zoned lands and a strip of Z9 Zoned land which forms the buffer between the site and the Tolka River- these lands are considered in the context of the Masterplan as they provide important additional public open space and access to the river.

The Schematic Masterplan Document has accompanied the application for the Hotel on the south east corner of the site, as the first application submitted under the Masterplan. This Application now seeks to bring forth the substantive elements of the Masterplan in the form of a significant new residential development and associated public open space.

The Schematic Masterplan has been considered comprehensively in the proposed approach as set out in this Strategic Housing Development Application and is detailed in this report, and in the Schematic Masterplan Report and Site Strategy Report prepared by HJL.

## 7 PROPOSED DEVELOPMENT

This proposed development for the site consists of:

*The development will consist of:*

1. *Demolition of a number of existing office/former college buildings on site, including the New Wing and Library Wing Buildings, (c. 6,130 sq.m) and the construction of a residential development with a gross floor area of c. 119,459 sq.m (excluding basement parking areas) set out in 12 no. residential blocks, ranging in height from 2 to 18 storeys to accommodate 1,614 no. Build to Rent apartments with associated residential tenant amenity, 1 no. retail unit, 1 no. café, and a crèche. The site will accommodate a total of 508 no. car parking spaces and 2,507 no. bicycle parking spaces in three separate basement/podium areas and at surface level. Landscaping will include extensive new public open spaces and communal courtyards, podiums and roof terraces.*
2. *The 12 no. residential buildings range in height from 2 storeys to 18 storeys, accommodating 1,614 no. Build To Rent apartments comprising 540 studios, 603 no. 1 bed units, 418 no. 2 bed units and 53 no. 3 bed units. The breakdown of residential accommodation is as follows:*
  - *Block A1 is a 4 to 8 storey building, including setbacks, balconies and terraces, accommodating 305 no. units;*
  - *Block A2 is a 7 storey building, including setbacks and balconies, accommodating 73 no. units;*
  - *Block A3 is an 8 storey building, including setbacks and balconies, accommodating 87 no. units;*
  - *Block A4 is a 6 to 13 storey building, including setbacks, balconies and terraces, accommodating 104 no. units;*
  - *Block B1 is a 5 to 6 storey building, including setbacks and balconies, accommodating 92 no. units;*
  - *Block B2 is a 6 to 8 storey building, including setbacks and balconies, accommodating 137 no. units;*
  - *Block B3 is a 5 to 6 storey building, including setbacks and balconies, accommodating 80 no. units;*
  - *Block C1 is a 6 to 8 storey building, including setbacks and balconies, accommodating 146 no. units;*
  - *Block C2 is a 5 to 7 storey building, including setbacks and balconies, accommodating 96 no. units;*
  - *Block D1 is an 18 storey building, including setbacks, balconies and terraces, accommodating 151 no. units;*
  - *Block D2 is an 4 to 8 storey building, including setbacks and balconies, accommodating 239 no. units;*
  - *The Seminary Building and South Link Building (E1&E2) are existing Protected Structures of 2 to 4 storeys with a proposed 5 storey extension to the rear of the Seminary Building and conversion of both buildings to accommodate 104 no. residential units including balconies; and*

- *Residential Tenant Amenity Space is provided throughout the existing and proposed blocks totalling c.3,463 sq.m and Communal External Amenity Space is provided adjacent each Block and at roof level on Blocks A1, A4, and D2, totalling c.13,729 sq.m.*
3. *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 (these are not included in the application boundary and no works are proposed to these Protected Structures with the exception of the proposed works to the Drumcondra Rd boundary wall which is listed under the Protected Structure of the Archbishop's House as noted below). The works to the Protected Structures within the application site are set out as follows:*
- *The Seminary Building (RPS Ref 1901): The works consist of the careful refurbishment and alteration of the existing four storey Seminary Building to provide residential accommodation, with the addition of a new five storey residential block to the rere (West elevation); floor levels carry through on the four lower levels. It is proposed that the existing structure, the Library Wing, on the northern elevation of the Seminary and the connecting corridors to the Seminary will be demolished; new infill concrete walls are located to fill the gap where elements are removed. Materials that can be salvaged from these blocks will be surveyed, their location noted, and re-used in the conservation and restoration works in The Seminary Building. The projecting WC blocks to the rere (west) elevation of The Seminary Building are also proposed to be demolished. The external envelope of The Seminary Building, with existing chimneys, stone and render finishes, windows and doors is maintained and re-used; the stone cross from the pediment is removed and built into a wall in the new residential block which forms an extension to the existing Seminary Building. Selected window opes on the lateral North and South elevations are lowered from door opes to provide for balcony access. The scheme proposes 56 no. apartments installed within the existing shell on the East side of a corridor running along the rere of the plan; the 48 no. apartments in the new block are linked to this corridor through a number of the window opes of the rere elevation which are lowered to ground level. Lightwells, lifts and staircases are also accessed in this way.*
  - *The South Link Building (RPS Ref 1901): The South Link Building consists of a two- storey stone and render block with slate roof and bellcote between Holy Cross Chapel and the The Seminary Building; this building will be conserved and restored. Alterations to the South Link Building include the insertion of a new doorway within the existing front (Eastern) façade to link the front of the building to the cloister garden, and the insertion of two no apartments in the ground*

and first floor space. The existing organ at first floor level will be moved to a new location within the Holy Cross Chapel.

- *Holy Cross Chapel (RPS Ref 1901): Holy Cross Chapel is retained and restored as a tenant amenity space. External alterations include a new metal door and ramp to the South elevation; interior alterations are limited to services and decoration; a section of the existing tiled floor will be lifted to allow for service connections to furniture installations. The following items will be moved from the Chapel as a part of the works: Main altar, 2 no. side altars, 2. no paintings to either side of chancel arch, Stations of the Cross, 2 no. marble statues to narthex, Loose pews, Confessional, Fixed furniture to sacristy. Method statements for these works are included in the application documents.*
  - *The Assembly Hall (RPS Ref 1901): The Assembly Hall comprises a two- storey hall with its front façade, steps and projecting porch orientated towards Clonliffe Road. The building is conserved and restored as a tenant amenity space as a part of the proposal; the existing balcony level within the main space is removed. The existing stage area is also removed to provide a gym area; bicycle storage is provided within the envelope to the North-West. Existing doors and windows are retained and repaired. A new window is provided into the cloister, with smaller secondary opes cut between spaces.*
  - *The Ambulatory (RPS Ref 1901): All of the above referenced buildings are linked by a cloister colonnade (i.e. the Ambulatory) around two sides of a central garden; there is a part section of the colonnade on the North side and an indented (enclosed) section directly outside Holy Cross Chapel; the fourth (east) side is completed by the rere elevation of The Seminary Building. The Ambulatory will be retained as part of the proposed development. The cloister garden will be restored and conserved as a part of the project for circulation and amenity use. Mosaic panels to the cloister will be retained and covered to supply a base for a removable light fitting. The courtyard garden will be re-designed and re-planted as a part of the scheme.*
  - *Drumcondra Rd Boundary Wall Entrance (Listed under Archbishop's House RPS 2361): The existing entrance gates and the adjoining walls are part of the Archbishop's House Protected Structure. It is proposed to take down the existing stone gate pier to the south, and reconstruct this pier in a new location further to the south, widening the gate opening in this location. This will involve the taking down of a small portion of the stone boundary wall.*
4. *Extensive areas of public open space of c.20,410 sq.m or 25% of the site is provided for, including woodland walk, formal lawn seminary garden, dog park and, playground. The proposed landscaping scheme provides for the removal of some existing trees on the site as well as extensive new planting.*

5. *Non-residential uses include a crèche of c. 627 sq.m and 1 no. retail unit of c. 329 sq.m in Block A4, and 1 no. café unit of c.273 sq.m in Block D1. Total gross floor area of proposed other uses is 1,229 sq.m.*
6. *The development will include a single level basement under Blocks B2, B3 & C1, containing 158 car spaces, 582 cycle parking spaces, plant, storage areas, waste storage areas and other associated facilities, a single level basement under Block D2 containing 86 car spaces, 528 cycle parking spaces, plant, storage areas, waste storage areas and other associated facilities and a part podium level basement, part single level basement under Block A1, containing 233 car spaces, 500 cycle parking spaces, plant, storage areas, waste storage areas and other associated facilities. The remainder of residents bicycle stores, totalling 645 spaces, are located proximate to residential buildings. In addition 31 no. parking spaces are located at surface level to include visitor, accessible, EV, car club and loading spaces as well as 252 no. short stay bicycle parking spaces.*
7. *The site is accessed by vehicles, cyclists and pedestrians from a widened existing entrance on Clonliffe Road, at the junction with Jones's Road, and through the opening up of an existing access point on Drumcondra Road Lower at the junction with Hollybank Road to act as a left in/left out access. No through route for vehicular access through the site for the public is proposed. 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 pitches and clubhouse to the north of the site and to a permitted hotel on Clonliffe Road (DCC Reg. Ref.: 2935/20, ABP Reg. Ref.: PL29N.30819).*
8. *The proposed application includes all site landscaping works, green roofs, boundary treatments, lighting, servicing, signage, ESB Substations, PV panels at roof level on all residential blocks except E1/E2 and D2, and associated and ancillary works, including site development works above and below ground.*

### 7.1 Overall Design Rationale

The site strategy and design evolution followed a number of key structuring principles and in response to site specific characteristics. Key design decisions were made during the pre-planning engagement with DCC, to optimise the living environment for current and future residents and to ensure that public accessibility was at the heart of the scheme. These included:

- Site characteristics: preservation of its institutional and wooded character. Retaining existing trees and responding to the scale of the existing buildings.
- Site Context: ensuring minimal impact on adjacent residential areas
- Topography: respond to the characteristics of the site.
- Existing protected structures: To enhance and protect the built heritage, historic setting, and strong landscape character of the lands

- Open space strategy: to deliver Public open space provision of 20% in accordance with Z12 zoning while retaining existing good quality trees and providing generous spacing between apartment blocks.
- Location and orientation of apartment blocks in the institutional setting.
- Connectivity and Permeability: Provision of pedestrian links with future pitches and the River Tolka.
- Massing and positioning of apartment blocks to ensure good daylight levels to all apartment units, open space and existing dwellings.
- Passive supervision to all open space to ensure they are safe and well used spaces.
- The taller buildings are positioned along the main entry routes within the site. These landmark buildings create focal points along the routes to the different neighbourhoods.
- Smaller blocks and large buffer of public open space located adjacent to Clonliffe Road to minimise visual impact in the area.

The proposed development has been designed to sit comfortably within its surrounds, minimising impact on adjacent development and the Protected Structures. The scheme as submitted for planning has been prepared with inputs from a number of scheme architects. These are set out as follows:

- Executive Architects & Blocks B1, B2, B3, C1, C2 & D2 – Henry J Lyons
- Blocks A1- A4- O’Mahony Pike
- The Seminary Building, South Link Building, The Assembly Hall & The Church (Block E1-E4) – McCullough Mulvin Architects
- Block D1- O’Donnell Tuomey Architects

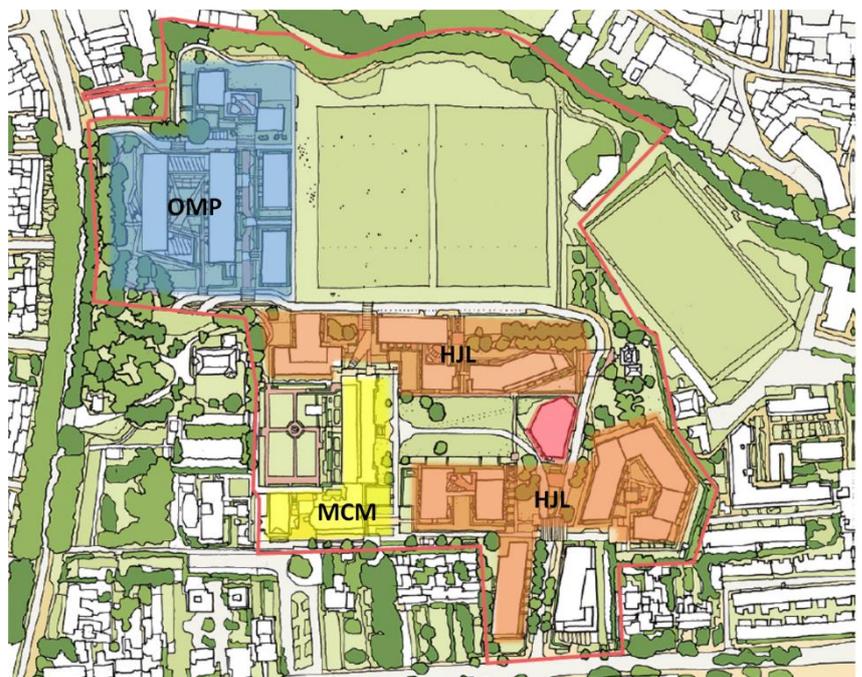


Figure 7.1: Scheme Architects

A Site Strategy Report has been prepared by HJL Architects which sets out the overall approach to the site and how it meets the objectives of the Masterplan. Each architect has then prepared an Architectural Design Statement which sets out the specifics of their blocks and how they comply with residential development standards.

## 7.2 Proposed Scheme Rational & Justification

The proposed scheme provides for 1,614 residential units, which by units mix is as follows:

Unit Type	Number of Units	Percentage
Studio	540	33.5%
1 Bed	602	37.3%
2 Bed	419	26.0%
3 Bed	53	3.3%
Total	1,614	100%

The comments by the Planning Authority in their Pre-Application Consultation Report are noted in respect of the proposed mix, as well as the request by An Bord Pleanala in their Opinion that:

*The proposed development shall be accompanied by detailed report providing a justification and rationale for the apartment mix proposed, having regard to, inter alia, National and Local planning policy, the site's context, and locational attributes. The report should outline the mix rationale in light of both SPPR 9 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) and Policy SN1 & QH6 of the Dublin City Development Plan.*

We note An Bord Pleanala's reference to SPPR9 however it is assumed that this should read as SPPR 8 (i), as SPPR9 relates to Shared Accommodation/Co-Living of which there is none proposed.

It is submitted that the proposed scheme has been considered in the context of SPPR 8 (i) of the Sustainable Urban Housing: Design Standards for New Apartments (2020) and Policy SN1 & QH6 of the Dublin City Development Plan which are set out as follows:

*SPPR 8 (i): No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*

As stated in SPPR 8 (i) of the Sustainable Urban Housing: Design Standards for New Apartments (2020) no restrictions on dwelling mix shall apply and as such the proposed scheme is in compliance with SPPR 8 (i).

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

**SN1:** *To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this plan.*

Policies QH6 and SN1 of the Dublin City Development Plan 2016-2022 are contained with the Plan to ensure that high quality and sustainable neighbourhood are created and maintained in the City. Part of this requires the provision of housing choice both in terms of units for purchase and rent and in unit sizes and types.

The primary of consideration in Dublin City Council's comments is in respect of the proposed mix of units, which in line with SPPR 8, relates to predominantly studio and 1 bed units. It is considered that which the mix is predominantly studios and 1 bed units the scheme is providing 471 (2 and 3 bed units).

As set out in the Housing Needs Assessment and Unit Mix Analysis by KPMG Future Analytics as part of this application, the proposed development is located in an established build up areas with limited development opportunities. There has been minimal to negative population growth in this area over the past 20 years compared to more suburban parts of the county and the direct core of Dublin City with population growing by 24% over 20 years or 1% per annum and accounted for +15,296 new persons over the period.

New population and housing in the area has been very minor since 2000, with just 20.6% of all units built post-2000. Future population growth potential is strongly linked to future consented planning pipeline. Both housing and population density within the existing 2km catchment of the Clonliffe Road site are significantly lower than the core city centre area, and the targeted densities for the wider city. The catchment has an average population density of 65 persons per hectare and a housing density of 28 units per hectare. The Dublin City Council Development Plan 2016-2022 indicates that higher densities of development should be supported in areas close to the city centre with higher capacity to support growth.

Projected population growth over the next 10 years will create significant additional demand for housing (private and social) in the wider Dublin City market area. As Drumcondra is located next to the city centre, in close proximity

to high quality public transport, the demand for units at this location is likely to be very strong. While the average cost to buy and rent is higher in Dublin City than it is in the wider Dublin Region or Nationally, it is likely to experience greater demand for housing on account of other demand factors, such as accessibility, proximity to employment opportunity, and an average household size that will likely follow the Dublin wide trend shifting toward smaller unit sizes.

In terms of contribution to the established neighbourhood in terms of greater typology mix the scheme provides for significant public open space for both proposed and existing residents. The network of open space will also provide for greater permeability between Drumcondra and Clonliffe Road/Ballybough and into the Docklands and City Centre with interspersed new social uses including a crèche, café and retail unit to serve both the new and existing community without detracting from the existing offerings in the area.

As outlined in the Site Strategy Report the units types are adaptable in the future should the market demand move away from the proposed units ensuring future proofing.

The existing area has a strong and diverse community and has a predominance of housing as the typology (c. 60% of units in the area are houses)- the blending of the proposed development into the existing typology will provide people the opportunity to live in this area which is close to the city with extensive local amenities. The focus of the applicant is to facilitate longer term rental ensuring that people who live here become part of the existing neighbourhood.

As such it is considered that the proposed scheme, in the context of the existing neighbourhood, provides for an *'attractive mixed-use sustainable neighbourhoods'* and *'a good urban neighbourhood'* in compliance with Policies QH6 and SN1 of the Dublin City Development Plan 2016-2022.

### 7.3 Compliance with the Zoning Objective

As outlined above the Z12 lands have specific requirements and objectives that have to be met in the development of residential on the lands.

We set out the development proposals to key aspect of the zoning objective below:

***a minimum of 20% of the site, incorporating landscape features and the essential open character of the site, to be retained as accessible public open space;***

The proposed development meets this requirement through the landscape strategy which responds to the rich green character of the surrounding context

along the river Tolka, the tree lined Drumcondra Road. The development plots have been defined by the site heritage and existing landscaping features. The intention is to 'gently' site the buildings within the landscape in order to create a sustainable, yet legible urban grain.

Public Open Space shall be delivered as a series of pockets connected via a green network which links up to the riverside linear park at the banks of the Tolka River. These pockets each have their own character area, rich in heritage, allowing the public to enjoy the setting of the woodland site whilst engaging with the protected structures by opening up the cloister garden.

Public open space is provided at 25% of the development area which amounts to c.2 ha or 20,410 sq.m.

Key pockets of open space have informed the geometries of the building blocks and creates a generous balance between the developed and undeveloped lands which make up the Masterplan.

This is considered further in Section 7.5 below and please refer to the Landscape Design Report prepared by NMP for further detail of overall strategy and key public open space.

***the preparation and submission of a masterplan setting out a clear vision for the future for the development of the entire land holding. 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;***

Please see enclosed Schematic Masterplan prepared by HJL. The Schematic Masterplan has been discussed in detail with DCC and sets out the development strategy for the wider landholding.

The primary vision of the Schematic Masterplan is to create a legible, easy to navigate, and welcoming piece of city that is pleasant to use, recognise and incorporates the history of the lands and associated built heritage and benefits from identifiable new buildings and public spaces. The Schematic Masterplan will ensure that the scale of the development will have a relationship with the existing suburban context, but also recognising that there is a need for higher density development, subject to appropriate safeguards in order to regenerate the area in an ambitious way. Taller buildings, where provided for, will act as 'markers' for major new open spaces.

As outlined above the proposed residential development provides for in excess of the 20% public opens space requirement and this excludes the wider lands

meaning that the Schematic Masterplan as a whole will deliver significant more than 20% public open space.

***the minimum 20% public open space shall not be split up into sections and shall be comprised of soft landscape suitable for relaxation and children's play, unless the incorporation of existing significant landscape features and the particular recreational or nature conservation requirements of the site and area dictate that the 20% minimum public open space shall be apportioned otherwise;***

Please see enclosed Site Strategy Report prepared by HJL Architects and the Landscape Design Report prepared by NMP Architects which identifies that in excess of the 20% public open space requirement, is provided by the scheme. The 25% public open space is provided by way of a necklace of spaces, to ensure that the existing structures and settings are retained. It has been the subject of discussion with Dublin City Council during pre-planning that the scheme as proposed is considered to be able to split up the larger spaces of open space under the provisions of the zoning objective which states '*incorporation of existing significant landscape features and the particular recreational or nature conservation requirements of the site and area dictate that the 20% minimum public open space shall be apportioned otherwise*'.

It is considered that the site has very significant existing buildings which are protected structures, existing open spaces which have setting relating to the protected structures and also existing routes, views and tree coverage which has dictated the available development plots which respect each of these existing features. As a result it was not possible to provide for a single public open space but rather a series of linked spaces which each provide for different uses and settings but together form a necklace of green spaces and a route for the public to move through the site from Clonliffe Rd to Drumcondra which was previously not possible.

***development at the perimeter of the Z12 sites adjacent to existing residential development shall have regard to the prevailing height of existing residential development and to standards in Chapter 16, Section 16.10 of the Development Plan pertaining to aspect, natural lighting, sunlight, layout and private open space;***

The proposed development meets the requirements of the Development Plan in regard to aspect, natural lighting, sunlight, layout and private open space. The scheme has been designed to scale up and down as it meets both existing features on the site but also the multiple adjacencies on all sides of the site.

Many of these considerations overlap with the performance criteria set out in the Urban Development & Building Height Guidelines. Please see Section 7.6 of this Report for detailed response to these considerations.

***the 10% social housing requirement shall apply.***

Social Housing Requirements under Part V of the Planning and Development Act (as amended) have been adhered to. The application documentation includes a copy of the draft Part V Pack which has been issued to DCC Housing Department in relation to the provision of social housing. A letter from Dublin City Council dated 9<sup>th</sup> April 2021 is included in this regard.

In addition to the 10% social housing requirement as part of the agreement on the sale of the lands, the applicant as part of the Development Agreement for the lands, is also providing for 10% affordable housing. The specifics of these units will be agreed post planning.

#### **7.4 Quality Housing**

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 a key public transport corridor. The site provides well designed external spaces and amenities for both existing and future residents in a high quality living environment.

## 7.5 Residential Development Standards

The proposed development is fully in compliance with the Dublin City Council Development Plan Standards, as set out in Chapter 16, and where superseded by the *Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities'* of December 2020 as they apply to Build To Rent Residential Accommodation.

This section of the Planning Report sets out compliance with these standards in tandem with the detail set out in the Housing Quality Assessment Table which is included with this Application.

The Guidelines identify Central/Accessible Urban Locations as 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 Bus Connects Core Corridor).

### Residential Quality Standards – Apartments

As the proposed scheme is Build-To-Rent a number of the SPPR provisions in the *Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities'* do not apply and SPPR7 & 8 are the primary standards to be considered

#### **Build To Rent**

Under SPPR 7 BTR development must be:

(a) 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;

The statutory notices for the proposed residential development describe the scheme as Build-To-Rent. The applicant is aware that An Bord Pleanála, in any grant of permission, will attach conditions requiring 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. This is accepted by the applicant who will provide the required legal agreement by condition.

(b) 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.

The application is accompanied by an Estate & Common Area Management Plan which outlines how the scheme will be managed and the facilities available to residents including a dedicated reception/concierge facilities and services including day to management of issues, post/deliveries, security, waste management 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 Site Strategy Report and the various Architects Design Statements outlines the extensive residential amenities provided for residents. This is also outlined in response to SPPR 8 (ii) below.

#### **Unit Mix**

The proposed mix is in compliance with the amended mix requirements of SPPR 8 of the Guidelines which states:

**SPPR 8 (i)**

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

The proposal includes the following mix:

Unit Type	Number of Units	Percentage	
Studio	540	33%	
1 Bed	602	37%	
2 Bed (3 Person)	115	7%	26%
2 Bed (4 Person)	304	29%	
3 Bed	53	3%	
Total	1,614	100%	

**Floor Areas**

The proposed floor areas are in compliance with the amended5 mix requirements of SPPR 8(iv) of the Guidelines which states:

**SPPR 3**

Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2-bedroom apartment (3 persons) 63 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (5 persons) 90 sq.m

**SPPR 8 (iv)**

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 proposed residential units meet or exceed the minimum standards for apartment sizes.

Compliance with minimum aggregate floor areas and widths for living/dining/kitchen rooms and bedrooms is outlined in the HQA as prepared by the various scheme Architects.

**Private and Communal Amenity Space**

The Guidelines, SPPR 8, states:

SPPR 8 (ii)

Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;

The Guidelines also require that communal amenity space must be provided within a scheme which can be in the form of courtyards, roof gardens etc. In addition in larger schemes, communal internal spaces are to be provided for residents use only i.e. multi-purpose rooms, cinema rooms, gym etc.

The Guidelines states that private amenity space shall be provided in the form of gardens or patios / terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security.

Where balconies or terraces are provided, they should be functional, screened with opaque material, have a sunny aspect, and be of a minimum depth of 1.5m.

The Guidelines require the following minimum private amenity sizes:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed (3P) 6 sq.m
- 2-bed (4P) 7 sq.m.
- 3-bed 9 sq.m.

As outlined above SPPR8 (ii) allows for flexibility in the provision of private amenity space and as such balconies have not been provided on all units, including the Seminary Building as this would involve significant interventions to the front of the Protected Structure. Where balconies are proposed for residential units, which is the majority of units, they meet or exceed the minimum standards for private open space.

The Guidelines also requires that communal amenity space must be provided within a scheme which can be in the form of courtyards, roof gardens etc. In addition in larger schemes communal internal spaces are to be provided for residents use only i.e. multi-purpose rooms, cinema rooms, gym etc.

The Guidelines require the following minimum communal amenity areas:

- Studio 4 sq.m
- 1-bed 5 sq.m.

- 2-bed (3P) 6 sq.m
- 2-bed (4P) 7 sq.m.
- 3-bed 9 sq.m.

Proposed communal amenity space

	No.	Area Required	Area Provided
Studio	540	2,160	
1 Bed	602	3,010	
2 Bed (3 Person)	115	690	
2 Bed (4 Person)	304	2,128	
3 Bed	53	477	
<b>Total</b>	1,614	8,465	13,896

The total communal open space requirement for the development is therefore well in excess of the requirements mitigating the non-provision of balconies for some units. In addition the future residents can enjoy the c. 2 ha of public open space in the scheme as well as open space outside the application site such as the area along the river. Although SPPR 8 allows for flexibility in the provision of communal amenity space the proposed scheme not only meets the minimum requirement but for a number of the blocks exceeds it.

The proposed development also proposes internal tenant amenity spaces which totals 3,504 sqm in size within the building envelope of the proposed development. This equates to 2.1 sq.m per unit. It is considered that this will take the form of multi-purpose rooms, working spaces, wifi zones, games rooms, meeting rooms, gym, cinema rooms etc. These are located in Blocks A1, A4, B1, C1, C2, D2 and with larger centralised space provided in the Assembly Hall and Church Building, as a central hub of amenity space, providing accessibility to all residents. These uses are spread throughout the scheme ensuring access to all residents. The approach to tenant amenity is set out in the Site Strategy Document.

**Storage**

The Guidelines states that minimum storage requirements must be met as follows:

The Guidelines require the following minimum storage areas:

- Studio 3 sq.m
- 1-bed 3 sq.m.
- 2-bed (3P) 5 sq.m.
- 2-bed 6 sq.m.
- 3-bed 9 sq.m.

As outlined above SPPR 8 provides for flexibility with regards the provision of storage areas and in general the proposed residential units meet or exceed the minimum standards for storage areas. Compliance with this is outlined in the HQA as prepared by the various scheme Architects.

### Aspect

With regards to dual aspect units the Development Plan and the Sustainable Urban Housing: Design Standards for New Apartments require that a minimum of 50% of the overall number of units in a scheme should be dual aspect for a suburban or intermediate locations and that a minimum of 33% of dual aspect units will be required in more central and accessible urban locations.

The Development Plan standards state that apartment units shall be provided with a good level of daylight and sunlight which contribute to a high quality living space.

Where single aspect apartments are provided, the provision of south facing units should be maximised with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered where overlooking a significant amenity such as a public park, garden or formal space or a water body or some other amenity feature.

The proposed scheme is in compliance with the amended mix requirements of SPPR 4 of the Sustainable Urban Housing: Design Standards for New Apartments which states:

#### SPPR 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) **A minimum of 33% of dual aspect units will be required in more central and accessible urban locations**, where it is necessary to achieve a quality design in response to the **subject site characteristics** and ensure good street frontage where appropriate.
- (ii) **In suburban or intermediate locations** it is an objective that there shall generally be a **minimum of 50% dual** aspect apartments in a single scheme. [our emphasis]
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects

The proposed scheme includes for an overall 51% of dual aspect units, in compliance with the Development Plan and Guidelines standards.

The Dual Aspect calculation, as set out in Vol. 5- Dual Aspect Report prepared by the scheme architects, excludes the proposed residential units contained in the existing Seminary Building, but includes the proposed new built elements, given the constraints of the adaption of the Protected Structure and the ability to provide for any dual aspect units.

There are no north facing single aspect units in the proposed scheme.

**Floor to Ceiling Heights**

The proposed mix is in compliance with the amended mix requirements of SPPR 5 of the Guidelines which states:

**SPPR 5**

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

The Guidelines identify that 2.4m is standard good practice however 2.7m would be a minimum standard for ground floor apartments but a higher ground floor should be considered where apartments are not proposed at ground level.

The proposed scheme has commercial ground floor heights where commercial uses are proposed c.5m, increased floor to ceiling heights where tenant amenity is proposed is c.3m and, all residential units are compliant with the Guidelines.

Detailed daylight assessment has been carried out on the proposed development by IES, and is outlined in greater detail in their accompanying report and in Section 6.8 of this report.

**Lift and Stair Cores**

The proposed mix is in compliance with the amended mix requirements of SPPR 8 (v) of the Guidelines which states:

**SPPR 8 (v)**

The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.

The proposed development has sought to minimise the number of cores and maximise the number of apartments off each with no block having more than 12 units per a single core.

**Internal Space Configuration**

Minimum internal space requirement for living/dining/kitchen rooms and bedrooms are set out in the Development Plan. Compliance with the internal rooms sizes are demonstrated in the consolidated HQA Table. It is considered that all of the proposed units meet or exceed the Guidelines requirements.

**Residential Quality Standards – Apartments & House Standards**

Section 16.10.3 of the City Development Plan outlines a number of residential quality standards to be applied to both apartment and house developments as follows:

**Public Open Space**

The Development Plan sets out requirements in relation to public open space on Z12 lands, as set out in Section 7.3. This open space strategy is set out in detail within the Site Strategy Report prepared by HJL Architects and in the Landscape Design Report prepared by NMP Landscape Architects. A landscaping plan is required for all developments, identifying all public, communal and private opens space.

Site Development Area	= 7.74 ha/ 77,400 sq.m
Required Public Open Space (20%)	= 1.5 ha/ 15,000 sq.m
Proposed Public Open Space (25%)	= 2 ha/ 20,410 sq.m

The scheme as proposed meets and exceeds the 20% public open space requirement. This excludes the Z9 lands and future pitches proposed to be provided by the GAA. This is identified in the image below.

A detailed landscape plan and design rationale prepared by NMP Landscape Architects has been submitted with the application which outlines the rationale and design concepts proposed.

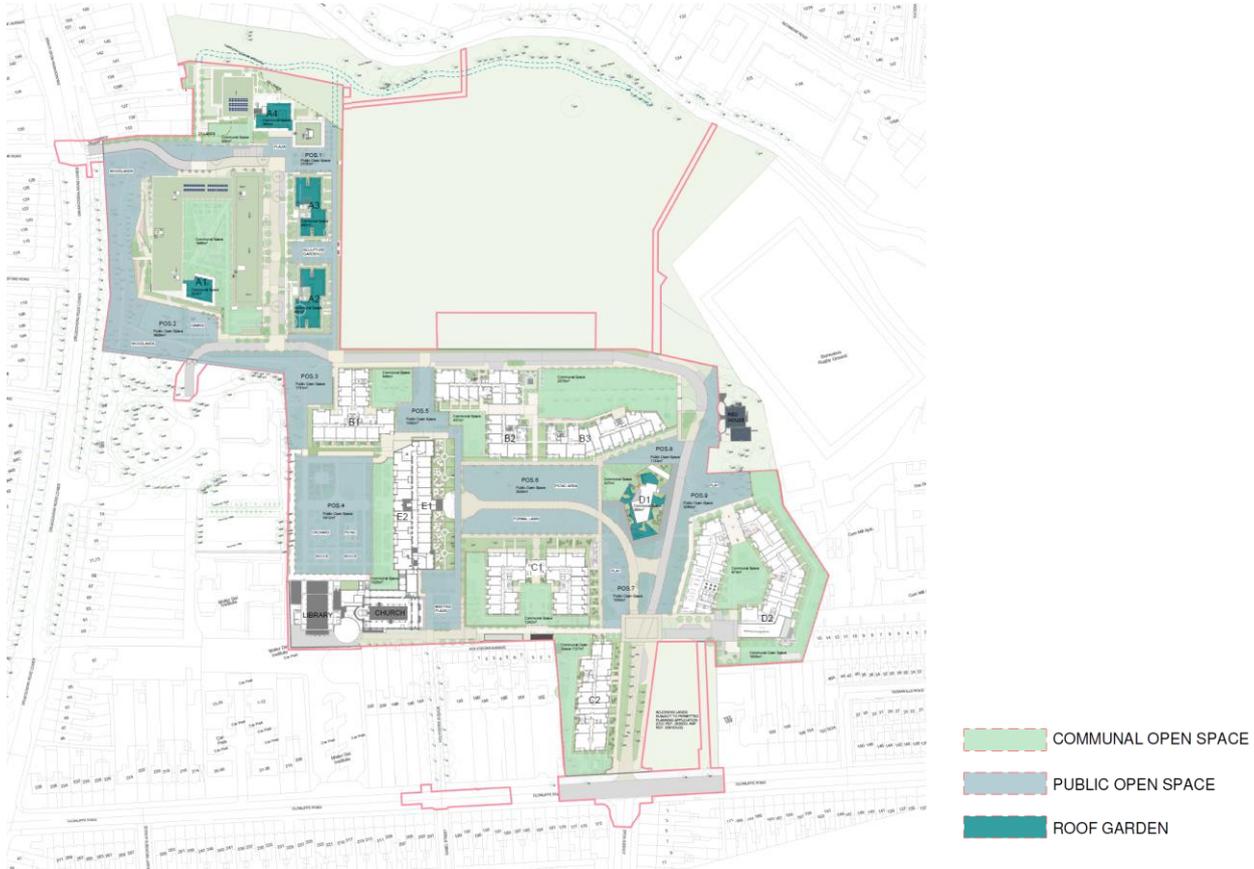


Fig 7.2: Breakdown of Public & Communal Open Space

### Plot Ratio & Site Coverage

The Development Plan sets indicative plot ratio and site coverage levels, to be used as a tool to assess development proposals. The Development Plan however acknowledges that both cannot be used alone to determine development proposals and *'need to be used in conjunction with other development control measures, including site coverage, building height, public and private open space, the standards applied to residential roads, and parking provision'*.

The Development Plan sets an indicative plot ratio standard of 0.5 – 2.5 for Z12 lands and the proposed scheme has a plot ratio of 1.49.

The Development Plan sets an indicative site coverage standard of 50% for Z12 lands and the proposed scheme has a site coverage of 23%.

### Safety & Security

The Development Plan sets out that the design of all residential proposals should have regard to the safety and security measures outlined in the *'Safety Design Guidelines'* Appendix and the *'Design for Safety and Security'* guidance contained in the DEHLG *'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities'* (2007).

It is submitted that the scheme has been designed cognisant of these Guidelines and this is evident from the Architectural Design Statements prepared by scheme architects.

### Acoustic Privacy

The Development Plan sets out that the design of all residential proposals should have regard to the guidance on sound insulation and noise reduction for buildings contained in BS 8233:2014. It is submitted that the scheme, as designed, has been designed cognisant of these BS standards.

## 7.6 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'. The site is located within 500m of the Drumcondra commuter Railway Station (Rail Hub), and at such locations building (commercial and residential) up to 24m are permissible in principle, under the Development Plan.

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 Guidelines post-date the Development Plan and as such height can be considered on a contextual basis.

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 Pre-Application Consultation Request to ABP seeks achieve greater height and density .The site’s suitability for this approach is set out in detail, as considered against the Guidelines in this Report and enclosed documentation. 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 site in within Dublin City’s suburbs.

**Development Management Principles and Criteria**

Section 3.2 of the Urban Building Height Guidelines provide guidance for Planning Authorities/An Bord Pleanala in considering development proposals for buildings taller than prevailing building heights in pursuit of the Guidelines. These are considered, in relation to the proposed development, as follows:

Development Management Principles and Criteria	Holy Cross College Proposed Scheme
<b>Principles</b>	
Does the proposal positively assist in securing National Planning Framework objectives of focusing 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?	Yes, as set out in Section 5.2.1, the scheme provides for a high quality, and significant quantum of residential development on a site zoned for future residential use and proximate to high frequency public transport within an existing established urban area which supports compact growth of key urban centres. The scheme delivers 1614 residential units in addition to crèche/retail/cafe uses and extensive public opens space available to both the existing and future community.
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?	Yes- the proposed development is fully in line with Development Plan objectives for the delivery of residential development within lands incorporated in to the Core Strategy, with the exception of Development Plan standards in relation to height and

	residential standards in respect of unit mix and floor areas, which are clearly set out in this Report. .
<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>Yes, the Development Plan was adopted prior to the publication of the Urban Development &amp; Building Height Guidelines and as such sets numerical height caps which the Guidelines recommend against the inclusion of and permits the consideration of proposed schemes against criteria set out in SPPR3.. However the subject site is zoned for residential development and supported by policies in the CDP for intensification and growth but is restricted currently in relation to height.</p>
<b>Criteria</b>	
<b>City/Town Scale</b>	
<p>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport</p>	<p>Yes, as set out in Section 2 of this report, the site at Holy Cross College Lands are in a highly accessible location, at just 400m walking distance adjacent an existing Commuter Train station, and high frequency bus corridor. In addition the site is within walking and cycling proximity of the city centre which provides for access to other modes of public transport such as Luas, Irish Rail network, the wider Dublin Bus network as well as private transport operators.</p>
<p>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified</p>	<p>The location, height and orientation of apartment blocks has been carefully considered to enhance and protect the built heritage, historic setting, and strong landscape character of the lands. This Strategic Housing Development application has included for a dedicated Landscape &amp; Visual Impact Assessment (contained within Chapter 13 of the accompanying EIAR). The proposed development has been designed to sit comfortably within its surrounds, minimising impact on both</p>

<p>practitioner such as a chartered landscape architect.</p>	<p>adjacent development and the existing Protected Structures and setting of the site. The LVIA identifies that on balance the effects on visual amenity would be neutral or positive and the proposed development can be appropriately integrated in the townscape without significant negative effects, especially after a short-term period to allow for establishment of the high-quality development and new residential community in its setting.</p>
<p>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>As outlined, in both the Materplan and Site Strategy Report prepared by Henry J Lyons, the the approach to height both responds to the existing context and provides for a new context in appropriate areas of the site whereby a focal point or marker building can integrate and define key parts of the site but can also be located to minimise and visual impact on both the existing external and internal context. The proposed development contributes to new public open space through the provision of 25% of the site development area as new public open space.</p> <p>The development introduces a variety of heights through the site which respond to surrounding land uses adjacent the site but also to proposed open spaces and historic buildings within the site.</p> <p>The site strategy is informed by the orientation of existing buildings, roads, trees and open spaces. The proposal maintains the patterns of the existing site while responding to the scale of the existing buildings to create spaces and streetscapes of interest.</p>

District/ Neighbourhood/ Street Scale	
<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</p>	<p>The proposed development incorporates provision for a significant area of public open space, positively contributing to the natural and built environment of the wider area. The scheme as proposed includes for c. 2ha or 25% of the development site area as public open space fully accessible to both future residential and the existing community thereby providing for a significant public amenity to the area. These open spaces are provided along a necklace of open spaces using the existing mature character of the site and integrating with the historic setting and buildings.</p> <p>It also provides for a crèche, retail and café units within the development, which will serve the wider area.</p> <p>The wider Masterplan area includes a looped walk, pedestrian connections and additional public open space.</p>
<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>The proposed development incorporates a variety of building forms, heights, and façade treatments, creating diversity yet presenting a unified approach to built form at this location. As set out in the LVIA (Chapter 13 of the EIAR) the approach to height in the scheme is through the ‘provision of new buildings stepping from a three to seven-storey perimeter with a general six-storey shoulder height addressing the central parkland with an 18-storey tall building (Block D) terminating the eastern end of the parkland opposite the Seminary Building’ which is considered to ensure a variety in urban form.</p> <p>This is set out in the Site Strategy Report, supported by the 4 no. Architectural Design Statements.</p>
<p>The proposal enhances the urban design context for public spaces and</p>	<p>The proposed development incorporates heights of 2 to 18 storeys</p>

<p>key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).</p>	<p>at appropriate locations on the site, where impact on adjacent lands is minimized, and where open space provision is enhanced. A Site Specific Flood Risk Assessment is submitted as part of this application for development, which demonstrates the development is in accordance with the Guidelines.</p>
<p>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</p>	<p>A variety of routes have been incorporated to traverse the site from North West to South East to connect the spaces and provide maximum permeability and choice in a safe and pleasant environment. This permeability from Drumcondra to Clonliffe Rd/Ballybough is currently not accessible through the site. The transport and mobility strategy for the site seeks to capitalise on the site’s accessible location and maximise opportunities for sustainable travel. While the proposed scheme is not reliant on it, the Masterplan for the wider lands contains a looped walk and possible future potential connections to Grace Park Road to the North. The proposed development has been designed to integrate into future proposals.</p>
<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The proposed development includes for a mix of apartment types and sizes which provide for occupancy at all stages of life. The wider Drumcondra area is comprised predominately of 2 storey terraced, detached and semi-detached housing. The proposed development will complement this existing provision enabling an increase choice in the neighbourhood.</p>

Site/Building Scale	
<p>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</p>	<p>As outlined previously the buildings range in height from 2 to 18 storeys in order to both meet existing context and to ensure minimal impact on daylight or sunlight quality of adjoining properties. The majority of the site is provided at 6-8 stories with heights stepping down adjacent to existing residential properties and sensitive receptors. The Daylight &amp; Sunlight Report, prepared by Arup as well as the LVIA (Chapter 13 of the EIAR) considers the issues of daylight, sunlight, overshadowing and views and concludes that the existing adjacent developments will not be significantly impacted by the proposal and that the proposed development will provide for a high quality of amenity for future residents.</p>
<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight (2<sup>nd</sup> Edition or BS 8206-2:2008 – ‘Lighting for Buildings- Part 2: Code of Practice for Daylighting’.</p>	<p>A Daylight and Sunlight Report, prepared by Arup, is included in this application and is also considered in the EIAR Microclimate Chapter. The assessment with regard to daylight and sunlight was carried out having regard to the required BRE Guidance, which is set out in the reports.</p>
Specific Assessments	
<p>Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</p>	<p>A microclimate assessment, has prepared by IES and is considered in the EIAR Microclimate Chapter. It has been prepared as an iterative process throughout the design process identifying where any problem areas exist and what mitigation is required to address them. In general the report concludes that the environment created by the proposed development will be suitable for intended uses i.e. sitting, walking etc. and it will be high quality environment.</p>

<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.</p>	<p><i>According to the winter bird surveys contained in Appendix 8.1 of the EIAR, the numbers of over wintering birds using the Holy Cross College lands is negligible. The Proposed Project will include the construction of new buildings, including one 18-storey block. However, the Proposed Project site is some 1.8km from the nearest SPA and the risk of collision is imperceptible. Birds tend to fly higher than the tallest obstruction in their flightpath and also to fly at a greater height between foraging sites. No Brent geese were observed anywhere on the site during two years of comprehensive bird survey and the Project Site is not an important site for this or any other overwintering species.</i></p> <p><i>Having regard to Specific Planning Policy Requirement SPPR3 of the Urban Development and Building Height Guidelines for Planning Authorities (December 2018), which notes that specific assessments may be required and these may include relevant environmental assessments to be undertaken, no issues arise in relation to any ecological receptors, for example via the disruption of flight lines for birds, or disruption to commuting or foraging bats.</i></p> <p><i>Similarly the proposed development is not expected to have any significant, permanent impacts on the habitats and species associated with the River Tolka corridor.</i></p>
<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</p>	<p>This is not considered relevant given the sites location as there are no identified communication channels or microwave links in the proximity of the proposed development and as such no assessment, as identified in SPPR3, was considered required</p>
<p>An assessment that the proposal maintains safe air navigation.</p>	<p>As the site is not located within any identified flight paths, it is considered that safe air navigation is maintained</p>

	and as such no assessment, as identified in SPPR3 was considered required.
An urban design statement including, as appropriate, impact on the historic built environment	This EIAR chapter prepared by Slattery Architects and in the McCullough Mulvin Design Statement in regards to proposed build form and materials taking account of the protected structures and historic fabric.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	As the site is over 2ha and 500 units an EIAR accompanies this Strategic Housing Development planning application. It is considered that the scheme has been fully assessed in the EIAR and is not reliant on these Guidelines to justify any potential impacts. Additionally an AA Screening Report is included.

The Guidelines in relation to these state that:

*Where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority shall apply the following Strategic Planning Policy Requirement under Section 28 (1C) of the Planning and Development Act 2000 (as amended).*

SPPR 3 in this regard states:

*It is a specific planning policy requirement that where;*

- 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan, local area plan or planning scheme may indicate otherwise.*

As is outlined in this report and the other documentation accompanying this application, 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, without impacting negatively on the surrounding environment. This is set out in further detail in the accompanying Material Contravention Statement.

## 7.7 Residential Amenity & Other uses

As outlined previously in the Report the residential development will be supported by a tenant amenity including 3,463 sq.m which will be provided in conjunction with the proposed residential development. A variety of amenity spaces are distributed throughout the development with some of the ground floor amenity spaces have associated external break out terraces.

In addition a crèche is proposed in the ground floor of Block A4.1 adjacent a proposed retail unit anchoring the Drumcondra end of the scheme and providing for activity in this part of the site. Additionally to anchor the public nature of the central open space a café unit is provided for in the ground floor of Block D1 with external seating spilling into this central space. This provides both public uses and activity to both the central open space but also visible from the main access point on Clonliffe Rd ensuring a sense of openness to the site to the existing community.

## 7.8 Childcare Facility

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.

## 7.9 Access, Car & Cycle Parking

The Urban Development and Building Height Guidelines seek to minimise car-parking in accessible locations and to maximise a modal shift to public transport due to proximity to public transport routes. In this case the Drumcondra Commuter train station and Dublin Bus QBC are relevant.

SPPR8 (iii) of the Guidelines in this regard state:

### **SPPR 8 (iii)**

There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures

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.

At surface level 31 no. spaces will be provided. Of these:

- 11 of these spaces will be for use by mobility impaired residents (as outlined above). This will ensure there is a suitable designated parking space with direct access to blocks without direct access to a basement.
- 16 of these spaces will be used as pay and display; and
- 4 of these spaces will be designated exclusively for car club use.
- loading bays will be provided along the site to serve the blocks and provide a set-down/pick-up facility;

This will bring the total number of car spaces to 517 for the residential portion of the masterplan, the basis of this application. A total of 5% of spaces will be reserved for those with mobility impairments. Electric charging points will also be installed for 10% of standard residential spaces with the remainder future proofed for 100% installation.

Based on the site accessibility, the relevant guidelines and international best practice this is considered the optimal number of spaces for the site that will ensure the sustainability of the site but facilitate a level of car storage. Up to 24 Club Car spaces will be provided on site to provide 'car-free' residents the option to travel by car for leisure trips.

This is considered further in the accompanying Traffic Assessment and Mobility Management Plan Report prepared by SYSTRA.

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 creche, 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 proposed residential development will promote sustainable travel patterns due to its location, layout, design and proximity to the public transport and cycle networks. These will be complemented with a MMP and the appointment of a Mobility Manager to promote sustainable travel patterns by residents.

The proposed residential development is located such that it will not have any traffic impact on the existing residential development in the area. The access and internal layout is designed in accordance with DMURS and includes for good permeability and will promote and facilitate sustainable travel patterns as part of the overall development.

As part of this application, pedestrian and cyclists access points into the site from the local network will be provided from the following points:

- Clonliffe Road at Holycross Avenue (southern edge of site);
- Clonliffe Road at the existing access into Holy Cross College at the junction with Jones’s Road (southern edge of site); and
- Drumcondra Road at the junction with Hollybank Road (western edge of the site);

Vehicular access to the proposed development from the local road network will be provided from the following two points:

- Primary access: from Clonliffe Road via an upgraded 4-arm signalised crossroads junction between Clonliffe Road, Jones’s Road and the Proposed Development. It is anticipated that the majority of vehicles to the development will utilise this access; and
- Secondary access: from Drumcondra Road Lower via a new left-in/left-out arrangement creating a 4-arm priority crossroads junction between Drumcondra Road, Hollybank Road and the proposed development. Only a small proportion of vehicles will utilise this access to reach the residential element of the development.

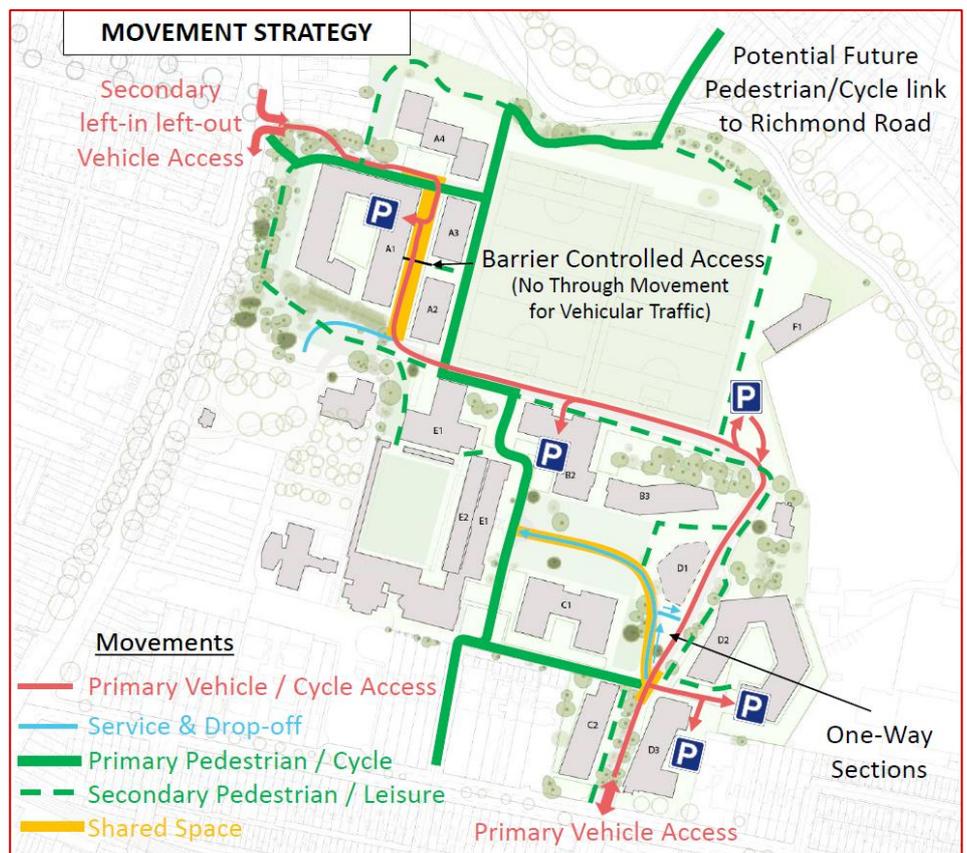


Fig 7.3 Proposed Access Strategy

The secondary access from Drumcondra Road will be for car park/delivery/crèche/retail and servicing/emergency access and access to the site only. The primary access from Clonliffe Road will provide access into all vehicular-designated areas of the site.

Circulation through the site has been designed so that it will not be possible for car traffic to cut through the development between Drumcondra Road and Clonliffe Road to avoid creating a “rat run”. A barrier system will be installed within a ‘home-zone’ between blocks A1 and A2. This will serve the dual purpose of calming traffic and controlling through movements.

### 7.10 Sunlight and Daylight

The overall configuration and design of the proposed development has been influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development. The proposed orientation of the blocks represents the best response to the site context in terms of day light and sunlight availability as a result of the density and height proposed. The Architectural Design Statements prepared by HJL/OMP/ODT/MCM accompanying this application, sets out how the internal elevations are designed to address sunlight and daylight optimisation in terms of reflectivity and lightness of materials proposed.

Detailed Daylight and Sunlight assessment has been carried out on the proposed development by Arup and is outlined in greater detail in their accompanying Report.

When considering the performance of the proposed development itself, the daylight and a sunlight availability could be described as better than typical for a mid-rise suburban development of this nature. The following observations can be made:

- All proposed amenity spaces, both public and communal, will be greater than the BR 209 target for direct sunlight (SHOG).
- 68% of the south facing windows tested meet or exceed the BR 209 recommended target of 25% for annual sunlight (PASH).
- 84% of the south facing windows tested meet or exceed the BR 209 recommended target of 5% for winter sunlight (PWSH).
- When combined kitchen and living rooms are benchmarked against 1.5% ADF, 90% of the rooms tested within the development meet the relevant BR 209 / BS 8206-2 targets.
- When combined kitchen and living rooms are benchmarked against 2.0% ADF, 81% of the rooms tested within the development meet the relevant BR 209 / BS 8206-2 targets.

- The methods within this report have not been altered to remove kitchen spaces from the calculation grids. In doing so, the development could have been presented with a narrative of >95% of units tested meet the relevant ADF targets. For reasons of robustness, transparency, clarity and fairness, this method has not been completed and presented. The reader is asked to benchmark the total percentage of units exceeding BR 209 / BS 8206-2 ADF targets reported here in the context of this.
- The impact of balconies in the proposed scheme on levels of ADF is significant. Despite Build to Rent developments under Sustainable Housing Design Standards for New Apartments (2020) not requiring balconies, they have been provided. Considering the wider context within which a balcony can provide positive residential amenity, the applicant believes the provision of balconies and the associated benefits outweighs the reduction in ADF within the rooms beneath them. We suggest that the associated ADF values are read, assessed, analysed and considered in this context.

The development at Holy College Cross Lands considers a range of much wider planning objectives beyond the diffuse daylight availability within apartment spaces. These are outlined fully within this report and summarised in the points noted below:

- Provision of high quality residential accommodation and associated tenant facilities on a zoned and serviced site in proximity to the City Centre in line with National Planning Policy and the delivery of residential development.
- The provision of extensive sunlit public open space and ensuring its integration with and access to the adjacent existing communities of
- Drumcondra and Ballybough.
- The design development of the project taking account of the existing site features including protected structures, historic views and settings, existing trees, adjacent residential development and future proposed development on the wider site.
- Meeting the required and sometimes competing standards under the Dublin City Development Plan and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) in the context of the National Planning Framework

When considering the impact of the proposed development on the daylight and sunlight availability in the existing surrounding environment, it can be stated that the proposed development has a negligible impact on almost all of the surrounding dwellings, with the exception of one smaller building (Caretakers Bungalow). At this location, a minor adverse impact in skylight availability and a negligible impact on sunlight availability is experienced.

In summary, the proposed development is said to:

- Have an overall negligible impact on the levels of daylight and sunlight availability in the surrounding existing properties and amenity spaces.
- Produce an environment that allows for plentiful sunlight penetration into all created amenity spaces and the majority of south facing apartment windows, in addition to producing appropriate levels of ADF within the apartments themselves.

### 7.11 Wind Microclimate Study

A Wind Microclimate Study prepared by IES is included as part of this planning application. Through the wind assessment it has been possible to highlight, at design stage, areas of concern in terms of downwash/funnelling/downdraft/and to identify critical flow accelerations that could potentially occur. Results of the wind analysis have been discussed with the design team so as to configure the optimal layout for the development with the objective of achieving a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian) and without compromising the wind impact on the surrounding areas and on the existing buildings.

The Report shows that the development has been designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian), and from a quantitative point of view, it does not introduce any major or critical impact on the surrounding areas and on the existing buildings with minor exceedances of seating criteria in limited locations

### 7.12 Community Infrastructure & Childcare and Schools Assessment

As required by the Dublin City Development Plan Section 16.10.4 ('Making Sustainable Neighbourhoods') a "Social & Community Infrastructure Audit" and "Schools Demand and Childcare Facilities Assessment" has been prepared as part of this application.

These reports, prepared by BSM, recognises that the subject site is located in a well-established neighbourhood of Dublin city, in close proximity to the city and well served by public transport which connects it to the wider city area. It equally recognises that there is a well-established social, community, recreation, and education infrastructure in the area, which the proposed development can contribute to, sustain, and further expand with a new residential community, new crèche facility, and in addition the proposed significant and extensive public open space provided for in the scheme.

## 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.

## 9 ENVIRONMENTAL ASSESSMENT

### 9.1 Birds and Habitats Directive – Appropriate Assessment

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

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

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

## 9.2 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 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 for the Strategic Housing Development Planning Application.

## 10 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 report 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, except where Material Contraventions are identified, 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 development and significant public open space on this former institutional lands proximate to the City Centre. This Report and the accompanying Statement of Consistency, 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 former institutional lands which are 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 should be permitted by An Bord Pleanála.