

File With _____

SECTION 131 FORM

Appeal NO: ABP 313947-22Defer Re O/H ☐Having considered the contents of the submission dated/ received 11/1/24
fromapplicant I recommend that section 131 of the Planning and Development Act, 2000
be/not be invoked at this stage for the following reason(s): circulate as per
Board directionE.O.: Lisa AnDate: 12/1/24

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage. ☐Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached
submission

to: _____ Task No: _____

Allow 2/3/4 weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 313947-22

M _____

Please treat correspondence received on 11/1/24 as follows:

- | | |
|--|--|
| 1. Update database with new agent for Applicant/Appellant _____
2. Acknowledge with BP <u>23</u>
3. Keep copy of Board's Letter <input type="checkbox"/> | 1. RETURN TO SENDER with BP _____
2. Keep Envelope: <input type="checkbox"/>
3. Keep Copy of Board's letter <input type="checkbox"/> |
|--|--|

Amendments/Comments

applicant's response to S134

4. Attach to file

- | | |
|---|---|
| (a) R/S <input type="checkbox"/> | (d) Screening <input type="checkbox"/> |
| (b) GIS Processing <input type="checkbox"/> | (e) Inspectorate <input type="checkbox"/> |
| (c) Processing <input type="checkbox"/> | |

RETURN TO EO ☒

	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: <u>Rosa O</u>	AA: <u>Cathy Carleton</u>
Date: <u>12/1/24</u>	Date: <u>12/1/24</u>

James Sweeney

From: Appeals2
Sent: Thursday 11 January 2024 15:27
To: Lisa Quinn; Lita Clarke
Subject: FW: ABP Ref. 313947-22 - Response to Section 137 Request - Dublin Central Site 5
Attachments: 20035 Cover Letter DC S5 Section 137 request.pdf; 20035 Dublin Central Site 5 S137 Response FINAL 11012024.pdf

From: Naoise O'Connor <naoiseoconnor@sla-pdc.com>
Sent: Thursday, January 11, 2024 3:22 PM
To: Appeals2 <appeals@pleanala.ie>; Bord <bord@pleanala.ie>
Cc: SLA Dublin Central <SLADublinCentral@sla-pdc.com>
Subject: ABP Ref. 313947-22 - Response to Section 137 Request - Dublin Central Site 5

Dear Sir, Madam,

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 are instructed by our Client (the Applicant), Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576 to submit this response to the Section 137 request for ABP Ref 313947-22 as issued by An Board Pleanála on the 13th December 2023.

We confirm that we act for the Applicant in this instance and would ask that all future correspondence in this matter be directed to this office.

We would be grateful for written acknowledgement of this submission at your earliest convenience.

Kind Regards,

Naoise O'Connor
Assistant Planner
STEPHEN LITTLE & ASSOCIATES
Chartered Town Planners & Development Consultants
26/27 Upper Pembroke Street,
Dublin 2 D02 X361

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e. naoiseoconnor@sla-pdc.com
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[Call me on teams](#)
[Message me on teams](#)



The SLA team have embraced hybrid working and continue to engage with our clients and colleagues in the industry through this new arrangement.

We value our team and are seeking to maintain/improve an appropriate Work/Life balance. As such, whilst it may suit us to respond on occasion, please do not anticipate a response to your email outside of normal working hours as the norm.

To ensure the most efficient use of resources, attendance at meetings will continue using various digital formats, including Microsoft Teams and Zoom.

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info@sla-pdc.com
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The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Our Ref. 20035

11 January 2024

RE: RESPONSE TO SECTION 137 REQUEST

PLANNING APPLICATION FOR THE PROVISION OF A MIXED-USE SCHEME IN A SINGLE BUILDING RANGING FROM 2 – 6 STOREYS OVER SINGLE STOREY BASEMENT COMPRISING OFFICE SPACE C. 5,753 SQ.M), 3 NO. CAFES/RESTAURANTS AND A NEW PUBLIC PLAZA, GENERALLY BOUND BY HENRY STREET TO THE SOUTH, MOORE STREET TO THE WEST AND HENRY PLACE TO THE NORTH AND EAST.

AN BORD PLEANÁLA REF: ABP-313947-22

DUBLIN CITY COUNCIL REG. REF: 2863/21

Dear Sir / Madam,

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 are instructed by our Client (the Applicant), Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576 to submit this response to the section 137 request as issued by An Bord Pleanála on the 13th December 2023. The following documents are enclosed with this response:

- Response to Section 137 Report, Prepared by Stephen Little and Associates

We confirm that we act for the Applicant in this instance and would ask that all future correspondence in this matter be directed to this office.

We would be grateful for written acknowledgement of this submission at your earliest convenience.

Yours faithfully,

Stephen Little,

Managing Director

STEPHEN LITTLE & ASSOCIATES

Response to
Section 137
Request (ABP
Ref. 313947-
22)

Dublin Central
– Site 5

For Development
Comprising Office, Café
/ Restaurant, and All
Associated and
Ancillary Development.

At Nos. 22 – 25 Moore
Street and Nos. 13 – 14
Moore Lane, Dublin 1

For Dublin Central GP
Limited

JANUARY 2024

25

Document Control: -

Author	Checked by	Purpose	Date
NOC	SL	Final	11.01.2024

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1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2, D02 X361 submit this response to a section 137 request to An Bord Pleanála. It is made on behalf of the Applicant, Dublin Central GP Limited, Riverside One, Sir John Rogerson's Quay, Docklands, Dublin 2, D02 X576.

The content of this Report responds to a letter from An Bord Pleanála, dated 13 December 2023, inviting the Applicant to make comments on matters of relevance to the proposed development by reference to changes and/or any wider provisions of the Dublin City Development Plan 2022-2028, that came into force since the lodgement of the appeal now before the Bord under Ref. ABP-313947-22 and that may have relevance to the proposed development.

Our client welcomes the opportunity afforded by the Bord to set out how the development proposed in this case is consistent with the relevant provisions of the Dublin City Development Plan 2022-2028.

A Masterplan for the entire Dublin Central site was prepared to provide the Planning Authority, prescribed bodies and the general public with a clear indication of the wider proposals for the area and this accompanied the planning application in this case. The Site 5 development forms part of that overall Masterplan.. The Masterplan is underpinned by the Dublin Central Masterplan Area Conservation Management Plan, prepared by Molloy & Associates Conservation Architects. As such, while separate planning applications have been made for individual sites within the Masterplan area, there is an obvious relationship between the sites. An architectural model was submitted to Dublin City Council, providing further information on the Site 5 proposal in the context of the Dublin Central Masterplan and which is now at the Bord's offices.

The Bord will have access to the public planning file in this case. To avoid duplication, this Response cross references to the relevant material already provided in the planning application file where necessary and appropriate, rather than repeating it.

2 DUBLIN CITY COUNCIL DEVELOPMENT PLAN 2022 – 2028

As noted by the Bord, since the lodgement of the Site 5 appeal, a new Dublin City Development Plan has come in to effect. The current Dublin City Development Plan 2022-2028 came in to effect on 14th December 2022. The following report provides a high level overview of how the scheme complies with provisions of the Chapters of the Dublin City Development Plan 2022-2028 identified by the Bord in their letter dated 13 December 2023. The response to each chapter/policy is outlined below, where we have identified those new policy objectives that are of most relevance. The Bord will of course, be undertaking their own review of the Development Plan provisions as part of this exercise and we trust the following is of assistance to the Bord in that regard.

The approach taken below is to identify the range of policy objectives of most relevance under each Chapter identified by the Bord and to provide a response to these below. We have sought to assist the Bord further by referencing material addressing some of the matters raised that formed part of the planning application determined by Dublin City Council. In that regard, whilst we will be referring to material submitted with the planning application in that context, the Bord will of course be aware that in addition to material lodged with the planning application itself, there was also an extensive submission of Further Information in response to a request from the Planning Authority for same. We trust the Bord will have regard to both sets of material.

In addition, the Applicant's Responses in this submission relate both to the Site 5 proposals themselves and to the Dublin Central Masterplan as a whole also, as appropriate.

2.1 Chapter 4 – Shape and Structure of the City

Policy SC1: Consolidation of the Inner City

To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging

communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties, the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.

Policy SC2: City's Character

To develop the city's character by:

- *Cherishing and enhancing Dublin's renowned streets, civic spaces and squares;*
- *Developing a sustainable network of safe, clean, attractive streets, pedestrian routes and large pedestrian zones lanes and cycleways in order to make the city more coherent and navigable and creating further new streets as part of the public realm when the opportunities arise;*
- *Protecting the grain, scale and vitality of city streets and encouraging the development of appropriate and sustainable building heights to ensure efficient use of resources, services and public transport infrastructure and that protects the heritage and natural assets of the city;*
- *Revitalising the north and south Georgian squares and their environs and realising their residential potential;*
- *Upgrading Dame Street/College Green as part of the Grand Civic Spine;*
- *Promoting the development of Moore Street and the Parnell Quarter as major new cultural and historical attractions for the city.*

Policy SC3: Mixed Use Development

To promote a mixed-use land use policy in the city centre, including the provision of high quality, sustainable residential development, and facilitating the conversion of both old office buildings and over shop spaces to residential.

Policy: SC4 Recreational and Cultural Events

To promote and support a variety of recreational and cultural events in the city's civic spaces; as well as the development of new and the retention and enhancement of existing civic and cultural spaces.

Policy SC5: Urban Design and Architectural Principles

To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.

Policy SC10: Urban density

To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.

Policy SC11: Compact Growth

In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:

- *enhance the urban form and spatial structure of the city;*
- *be appropriate to their context and respect the established character of the area;*

- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*
- *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.*

Policy SC14: Building Height Strategy

To ensure a strategic approach to building height in the city that accords with the Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4

Policy SC15: Building Height Uses

To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.

Policy SC16: Building Height Locations

To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area

Policy SC17: Building height

To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:

- follow a design led approach;
- include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3);
- make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;
- deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced;
- Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and
- have regard to the performance-based criteria set out in Appendix 3.

All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.

Policy SC18: Landmark/Tall Buildings

To promote a co-ordinated approach to the provision of landmark/tall buildings through Local Area Plans, Strategic Development Zones and the Strategic Development and Regeneration Area principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline and that such proposals comply with the performance based criteria set out in Appendix 3

Policy SC19: High Quality Architecture

To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.

Policy SC20: Urban Design

Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019).

Policy SC21: Architectural Design

To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change.

Policy SC22: Historical Architectural Character

To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures.

2.1.1 Applicant's Response

Regeneration

In the first instance we refer the Board to Section 2.8 of this response which addresses regeneration in the context of the SDRA in detail.

The Dublin Central masterplan is a significant urban regeneration project that encourages high-quality urban design and architectural details that contribute to the historic streetscape and creates new points of interest in the area.

The site of the Masterplan accommodates a disparate collection of single to eight storey buildings of varied vintage and quality. The area is characterised by a mix of uses including retail, financial services, office, food and beverage services. It is also characterised by a number of unoccupied or underutilised buildings, plots, car parking and storage depots, service lanes and back lane workshops. Some of the buildings are afforded a level of legal heritage protection (particularly along O'Connell Street) and many others are not. There is significant potential to revitalise this central urban quarter of Dublin city centre through redevelopment and adaptive reuse, and in turn to stimulate the regeneration of the surrounding areas including the cultural quarter at Parnell Square.

Site 5 is consistent with the national policy objectives of the NPF in achieving sustainable mixed-use development (including office, café / restaurant uses) appropriate to the regeneration and rejuvenation of this city block at Moore Street, and the wider Masterplan, in the heart of Dublin City Centre.

The site of the Masterplan accommodates a disparate collection of single to eight storey buildings of varied vintage and quality. The area is characterised by a mix of uses including retail, financial services, office, food and beverage services. It is also characterised by a number of unoccupied or underutilised buildings, plots, car parking and storage depots, service lanes and back lane workshops. Some of the buildings are afforded a level of legal heritage protection (particularly along O'Connell Street) and many others are not. There is significant potential to revitalise this central urban quarter of Dublin city centre through redevelopment and adaptive reuse, and in turn to stimulate the regeneration of the surrounding areas including the cultural quarter at Parnell Square.

We refer the Board to the ACME Masterplan material and Molloy & Associates Masterplan Conservation material for full details on the regeneration of the Dublin Central masterplan site as well

as the ACME architectural material and Molloy & Associates Conservation material for Site 5 in particular, all documents were submitted at application stage.

Compact Growth

Site 5 is an appropriate redevelopment of a highly accessible, underutilised, brownfield city centre site for a mix of uses including office, food and beverage uses.

The proposed mix of uses is consistent with strategic planning policy at national, regional and local level that promotes the consolidated compact growth of employment opportunities and housing at well connected, integrated city centre locations.

We refer the Board to Section 2.9 of this report below for discussion on how the scheme and the Masterplan has had regard to the criteria set out in Chapter 15 – Development Standards.

Building Height

The planning application seeks permission for a mixed-use scheme which ranges in height from 2 — 6 (over single storey partial basement). We then refer the Board to the Design & Access Statement, prepared by ACME Architects, in particular Section 4.0 (Height, Massing & Scale) and Appendix I (Building Height Criteria) for a further detailed design discussion relating to building height as submitted with the application.

The building height strategy adopted for Site 5 has been considered in the context of the wider Masterplan vision. Site 5 announces the wider regeneration scheme at a key location adjoining Moore Street fronting on to a new square.

Along Moore Street the new buildings follow the existing building line, plot lines, and building heights. Historical records show that the buildings on these plots were originally 3 and 4 storeys high, and these heights have been maintained, with the four storey element moving north to the corner of the O’Rahilly Parade, to mitigate the change in height between the three storeys of the historic fabric and the 6 storeys of the Jury’s Inn Hotel.

The building line of O’Rahilly parade has been widened to allow for a pavement, a loading bay and a disabled parking space to accommodate increased pedestrian movement anticipated from the proposed Metrolink Station as well as allowing for service vehicles to use this street. The building rises to 6 storeys to maintain the tight sense of enclosure provided by the earlier warehouse and tenement buildings. The building line is maintained on Moore Street, aligned with the rear of the National Monument and other retained and proposed buildings to the south.

The Planners Report noted the following in relation to the building height at Site 5 -

“It is considered that the greatest impact of the proposal would be from within the immediate vicinity of the site, including Moore Street and Moore Lane, where there will be a significant degree of change, based on the current situation. It is considered however that a significant degree of change does not necessarily equate to a negative impact. In this instance it is considered that the proposed development, in terms of height and massing would be in keeping with the existing and developing built context and does not give rise to an unacceptable or overbearing impact upon the adjoining development.”

High Quality Architecture

It is an ambition of the Dublin Central Masterplan to deliver a world class City Quarter that site respectfully within its context, utilising its location and heritage features. Drive long term value provision of high quality commercial and retail space. The Dublin Central Masterplan, including Site 5, incorporates high quality, contemporary design whilst also acknowledging the need to incorporate the quality historical elements.

The Planning Authority consider that the applicant team have ‘developed a legible strategy to provide an appropriate hierarchy and therefore achieve a simple, strong and rationale façade articulation’. The Planning Officer notes that the Site 5 proposal “is very much a contemporary modern office building which is noted to be a step change from the standard historical redbrick finishes used throughout development in the locality. It is however considered this contrast, clearly distinguishing new interventions from historic. Accordingly it is considered that the proposed development is unlikely to have a detrimental visual impact”.

The overall design of Dublin Central took in to consideration the existing context and the scale and pattern of the existing streets, and it respects and enhances the areas architectural assets whilst creating a number of new landmark features.

The development also promotes the guidance set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (DMURS). We refer the Board to the Architect’s Design Statement, prepared by ACME Architects as submitted at application stage, for a detailed discussion of each of the 12 design criteria as well as the Engineering Documents prepared by Waterman Moylan Engineering Consultants which detail how the scheme is compliant with DMURS.

2.2 Chapter 6 – City Economy and Enterprise

Policy CEE1: Dublin’s Role as the National Economic Engine

- (i) *To promote and enhance the role of Dublin as the national economic engine and driver of economic recovery and growth, with the city centre as its core economic generator.*
- (ii) *To promote and facilitate Dublin as a creative and innovative city that is globally competitive, internationally linked, attractive and open.*
- (iii) *To promote an internationalisation strategy building mutually-beneficial economic and other links with key cities globally to encourage investment and tourism in Dublin.*

Policy CEE2: Positive Approach to the Economic Impact of Applications

To take a positive and proactive approach when considering the economic impact of major planning applications in order to support economic development, enterprise and employment growth and also to deliver high-quality outcomes.

Policy CEE7: Strategic and Targeted Employment Growth

To promote strategic and targeted growth of strategic development areas and corridors in accordance with the RSES and MASP with a focus on the city centre, the Docklands, the Outer City and Key Urban Villages and Neighbourhood Centres/Urban Villages.

Policy CEE8: The City Centre

To support the development a vibrant mix of office, retail, tourism related and cultural activities in the city centre and to facilitate the regeneration and development of key potential growth areas such as the Diageo lands, the St. James’s Healthcare Campus and Environs and the TU Dublin campus at Grangegorman.

Policy CEE12: Transition to a Low Carbon, Climate Resilient City Economy

To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.

Policy CEE13: Towards a Green and Circular Economy

To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation.

Policy CEE14: Quality of Place

To recognise that 'quality of place', 'clean, green and safe', is crucial to the economic success of the city, in attracting foreign and domestic investment, and in attracting and retaining key scarce talent, residents and tourists.

Policy CEE19: Regeneration Areas

To promote and facilitate the transformation of Strategic Development and Regeneration Areas (SDRAs) in the city, as a key policy priority and opportunity to improve the attractiveness and competitiveness of the city, including by promoting high-quality private and public investment and by seeking European Union funding to support regeneration initiatives, for the benefit of residents, employees and visitors.

2.2.1 Applicant's Response

Dublin City is regarded as an internationally competitive capital and the Development Plan aims to safeguard and enhance the said role as well as to: -

- Promote strategic and targeted employment growth.
- Support regeneration and tackle vacancy.
- Support the creation of high quality urban spaces and the transition to a low-carbon, green, circular economy.
- Support key economic sectors.
- Foster local economic development and social enterprise.

Site 5 forms part of a wider regeneration and development project, Dublin Central, planned for an area comprising almost three entire urban blocks located between O'Connell Street Upper, Parnell Street, Moore Street and Henry Street.

This area currently accommodates a range of existing buildings of varied form, quality and architectural and cultural heritage significance, which have accommodated a variety of uses as the development of the City evolved over time. There have been different periods of grandeur and vibrancy, destruction and replacement, boom and bust that have affected the character of this part of the city.

The Dublin Central area has in the more recent past experienced significant under-utilisation and decline. Notwithstanding that O'Connell Street is one of Ireland's premier thoroughfares and Henry Street is one of our busiest shopping streets, not all of the buildings or individual plots located within the adjacent project area are currently occupied or developed in a manner that is reflective of this context.

There is, however, significant potential to revitalise this central urban quarter of Dublin city centre through redevelopment that will enhance the competitive position of Dublin city centre. This will include the integration and adaptive reuse of existing built fabric that is important to our sense cultural identity. The Masterplan seeks to inject new life through the sustainable regeneration and revitalisation of this area at the heart of Dublin city centre. It seeks to create a world class City Quarter, with a vibrant mix of uses, in new and historic buildings that sit respectfully within the existing open street structure. It recognises the status of O'Connell Street as one of Ireland's most important civic thoroughfares and the potential of the area to attract and engage visiting, working and residential communities.

The Masterplan seeks to optimise the regeneration opportunities presented by the central location, accessibility, architectural heritage features and cultural identity of O'Connell Street and environs,

including Henry Street, Moore Street and Moore Lane. It envisages a mix of uses that will drive activity and vibrancy through the day and evening. It sets down the design principles for the integration of an ordered variety of new and historic buildings and a well-designed public realm, informed by the historic street structure and past events in this area. We refer to the Masterplan, prepared by ACME Architects and Gross Max Landscape Architects, that accompanies the application for further discussion of the urban regeneration and design principles that inform the development for each of the identified 'Sites'.

The office use proposed in Site 5 (in tandem with the office use proposed in Site 2 and 4) will support the economic regeneration of the area. The people intensive office use proposed will benefit from being in a location which is exceptionally well connected with existing public transport. Accessibility will be further enhanced with the implementation of MetroLink and BusConnects. The proposed office use will support the generation of direct and indirect employment opportunities, contributing to Dublin's role as an engine of national economic growth.

Considerable care has been taken in the identification of suitable uses and in the architectural design, expression and materiality of Site 5, to ensure the scheme is the correct fit for this site, in the context of its location within the O'Connell Street ACA.

Site 5 comprises a commercial office building, designed to accommodate either a single or multiple tenants. The ground floor level contains the office entrance, café / restaurant units. Accessible terraces are provided at three levels (2nd, 3rd and 5th Floor) for office workers. The basement houses part of the plant area, with further plant areas on the roof.

The office entrance is from the proposed new public plaza, which is marked by a change in the facade treatment above, creating a double height recess. The office entrance will create a focal point and ensure there is a high level of footfall passing through and around the square.

The entrance to the café / restaurant units are directly from the proposed new public plaza. The café / restaurant units at ground floor also have entrances onto Moore Street, O'Rahilly Parade and Moore Lane to ensure there is activity onto each street adjoining Site 5. The café / restaurant unit facing Moore Lane has a secondary entrance from Moore Lane to capture footfall from the future proposed Metrolink station on the other side of Moore Lane.

Bicycle facilities can be accessed from O'Rahilly Parade and they serve as a secondary entrance for building users that approach the building by bicycle. This will create additional activity on O'Rahilly Parade along with the additional entrances proposed to the café / restaurant units.

The 1st to 5th floors accommodated the proposed office use. The floor plate size decreases in size gradually on the 2nd and 3rd floor stepping back from Moore Street and allowing for generous planted roof terraces with provide attractive views along Moore Street, O'Rahilly Parade and the newly created square south of the building. The terraces will also provide additional passive surveillance of the surrounding streets and proposed new public plaza.

Site 5 provides for office use from 1st to 5th floor of the proposed buildings. The building layout has been designed to accommodate either a single or multiple tenants.

The proposed office use, in combination with the other café / restaurant uses within Site 5 will help to create an active and vibrant retail streets and mixed-use urban quarter.

3no. café / restaurant units are proposed to provide a variety of dining and social opportunities at ground floor level of Site 5. These units proposed are: -

- **Unit 1:** A licensed café / restaurant with takeaway / collection facility with frontage onto the O'Rahilly Parade, Moore Lane and the new public plaza.
- **Unit 2:** A licensed café / restaurant with takeaway / collection facility with frontage onto the new public plaza.
- **Unit 3:** A licensed café / restaurant with takeaway / collection with frontage onto the O'Rahilly Parade, Moore Street and the new public plaza.

We refer to the Design & Access Statement, prepared by ACME Architects, provides a detailed breakdown of the café / restaurant provision proposed.

A 'delivery hub' is proposed in Site 5. It is located on O'Rahilly Parade adjacent the service bay for convenient access for deliveries.

The 'delivery hub' is proposed to cater for non-bulky, non-food items to 2AB, Site 3 and Site 4. The 'hub' will essentially operate as a point of receipt for parcel deliveries to Sites 2AB, Site 3 and Site 4, arriving after 11am.

Goods will be delivered from the hub via either cargo bike (if permitted) or via goods trolley with electric hand tug. Such facilities will be stored within the hub.

No goods will be stored in the delivery hub overnight, but instead delivered to the appropriate location as and when the goods arrive, after 11am daily. Therefore, the hub does not need to cater for long term storage of goods.

It should be noted that in the Planners Report for Site 5 noted the following of relevance to Chapter 6 of the Development Plan: -

"Taking into account the dilapidated and underutilised nature of the subject site, it is considered that the proposed development on the Z5 lands is acceptable in principle, contributing to the provision of office accommodation with the area and is considered an appropriate use for the site."

The applicant has a strong track record of sensitive urban regeneration projects, including those in historic city centres, such as Bishopsgate development located in Spitalfields in London. In 2017 Hammerson became the first real estate company globally to launch a comprehensive Net Positive strategy covering both environmental and socio-economic impacts. The team has worked hard to ensure resource efficiency, climate risk and health and wellbeing considerations were embedded at the outset of the Dublin Central design process.

It should be noted that the planning application was accompanied by a comprehensive EIAR which assessed the Masterplan as well as each individual sites.

The Landscape Masterplan, prepared by Gross Max Landscape Architects for the overall Dublin Central Masterplan is guided by an overall design vision which follows the objective to create a sustainable public realm with increased biodiversity. This will be done using green roofs to increase biodiversity, to slow rainfall run-off and improve the microclimate. New tree planting to be climate adaptable and suitable for site conditions.

It is noted that a key climate mitigation action for all new development relates to the need to reduce energy demand, to increase energy efficiency and to provide renewable energy on-site if possible. We refer the Board to the Dublin Central – Site 5 Energy & Sustainability Statement, prepared by BDP M&E Consulting Engineers which accompanied the planning application. The proposal contained in the BDP Report align with the requirements set out above. It notes *"The Dublin Central Site 5 project is aspiring to be one of Ireland's first Net Zero Carbon schemes offering workers and visitors a low carbon footprint alternative for Dublin."*

Furthermore, the energy efficiency measures to be adapted in the proposed development will assist in achieving the target set out in the Climate Action Plan 2024 to reduce carbon emissions within the built environment.

The planning application has been designed to be Ireland's first Net Zero Carbon schemes, the design maximises sustainable energy uses, materials, uses appropriate SuDS measures throughout and enhances biodiversity of the urban block.

2.3 Chapter 7 – The City Centre, Urban Villages and Retail

Policy CCUV2 Retail Hierarchy

To implement the retail hierarchy contained in the 'Retail Strategy' of this Development Plan and to support retail development at all settlement levels in the city. Retail development within the hierarchy of centres will be of a scale, type, and nature that reflects and enhances the role and function of the centre within which it is proposed as per the Retail Strategy, Appendix 2.

Policy CCUV3 Sequential Approach

To promote city centre and urban village vitality through the sequential approach to retail development, enable good quality development in appropriate locations, facilitate modal shift and to deliver quality design outcomes.

Policy CCUV4 The Role of Retail

To promote and support the major contribution of retail and retail services to the vitality and success of the city, as a significant source of employment, a focus of tourism, as an important recreational activity and as a link with other cultural, recreational and community activities.

Policy CCUV6 Large Scale Retail / Mixed Use Developments

To ensure that large scale retail / mixed use development proposals match the capacity of existing and planned public transport; provide good quality street environments to provide safer and more attractive settings for people to shop / do business; and incorporate cycle and pedestrian friendly designs in line with the Retail Design Manual 2012.

Policy CCUV7 Variety in Shopping Offer

Development proposals for major new retail and complementary developments will be expected to provide a range of unit sizes to encourage variety in the shopping offer and support small business growth.

Policy CCUV9 Independent Retailing

To support the independent retailing sector by continuing to provide financial support, skills training and education through the Local Enterprise Office and other means.

Policy CCUV10 Specialist Shops

To acknowledge the unique attraction/distinctiveness of specialist shops / independent / indigenous retail in the city centre and inner city which contribute to the character and attractiveness of the city centre.

Policy CCUV12 Shopfront Design

To require a high quality of design and finish for new and replacement shopfront signage and advertising. Dublin City Council will actively promote the principles of good shopfront design as set out in Dublin City Council's Shopfront Design Guidelines and Chapter 15

Policy CCUV13 Vacant Units

To promote the temporary use of vacant premises in order to reduce the level of vacancy on streets in the city's urban centres including Key Urban Villages as this can compromise the vitality of urban centres. Temporary uses which can contribute to the economic, social and cultural vitality of the city centre, Key Urban Villages and other centres and which allow public access will be encouraged (pending permanent occupancy).

Policy CCUV15 Premier Shopping Area

To affirm and maintain the status of the city centre retail core as the premier shopping area in the State, affording a variety of shopping, cultural and leisure attractions. In line with the Retail Planning Guidelines, 2012, the city centre should be the main focus for higher order comparison retail in the city to protect its retailing role and primacy.

Policy CCUV16 Category 1 and Category 2 Streets

To protect the primary retail function of Category 1 Streets in the city and to provide for a mix of retail and other complementary uses on Category 2 streets. To promote active uses at street level on the principal shopping streets in the city centre retail core having regard to the criteria for Category 1 and Category 2 streets (see Appendix 2 and Figure 7.2).

Policy CCUV17 Diversifying the City Centre

To ensure the resilience of Dublin City Centre to changing trends in retail demand, appropriate opportunities to further diversify the city centre as a place to live, work and socialise will be encouraged.

Policy CCUV19 Parking and the Retail Core

To support the re-use and replacement of multi storey car parks in the centre of the retail core and to safeguard short term car parking provision for shoppers and visitors at the periphery of the retail core. The redevelopment of central car parks will support public realm improvements and pedestrian priority in the retail core and can support the retail core and night time economy by providing additional mobility hubs and other innovative transport solutions, see also Policy SMT28 (Chapter 8).

Objective CCUV05 Underutilised and Inactive City Centre Streets

To reactivate the underutilised and inactive city centre streets and lanes in the city centre through the inclusion of art, landscaping, street furniture, outdoor dining, activity spaces and residential uses.

Policy CCUV30 Cafés / Restaurants

To promote and facilitate the provision of cafés / restaurants in the city and support their role in making the city more attractive for residents, workers, and visitors and in creating employment.

Policy CCUV31 Food and Beverage Clusters

To support emerging food and beverage clusters around the city centre; see Figure 4, Appendix 2, particularly around the Henry Street and Westmoreland Street areas of the city to enhance the appeal of the north and south retail cores.

Policy CCUV32 Outdoor Dining

Proposals for outdoor dining / trading from premises extending into the street will be supported where they would not harm local amenity or compromise pedestrian movement, accessibility needs or traffic conditions.

Policy CCUV33 Support for Markets

To facilitate indoor and outdoor markets both in the city centre and throughout the city particularly where they support the existing retail offer and local produce/start up enterprise and the circular economy; and to realise their potential as a tourist attraction.

Policy CCUV34 Moore Street Market

To recognise the unique importance of Moore Street Market to the history and culture of the city and to ensure its protection, renewal and enhancement in cooperation with the traders, and taking account of the contents and relevant recommendations of the Moore Street Advisory Group Report, the OPW and other stakeholders including the response of the Minister for Heritage and Electoral Reform.

Policy CCUV35 Night Time Economy

To support and facilitate evening / night time economy uses that contribute to the vitality of the city centre and that support the creation of a safe, balanced and socially inclusive evening / night time economy.

Policy CCUV36 New Development

To support uses that would result in the diversification of the evening and night time economy where there is little impact on the amenity of adjoining or adjacent residential uses through noise disturbance and where there are no negative cumulative impacts in terms of other night-time economy uses in the area.

Policy CCUV37 Plan Active and Healthy Streets

To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is to encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.

Policy CCUV38 High Quality Streets and Spaces

To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.

Policy CCUV39 Permeable, Legible and Connected Public Realm

To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.

Policy CCUV40 Public Safety

To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.

Policy CCUV42 Public Realm – City Centre

To move to a low traffic environment generally and to increase the amount of traffic free spaces provided in the city centre over the lifetime of the Plan as well as create new high quality public realm areas where possible taking into account the objective to enhance access to and within the city centre by public transport, walking and cycling.

Policy CCUV44 New Development

That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility

2.3.1 Applicant's Response

Site 5 comprises café / restaurant and office uses, which are all permissible in principle under the Z5 zoning.

The scheme is representative of plan-led, high-quality urban and architectural design, which seeks to achieve the sustainable regeneration of an underutilised brownfield site. It delivers an appropriate mix of uses, with street activating café / restaurant uses at ground, complemented by office uses at upper floors.

Considerable care has been taken in the identification of suitable uses and in the architectural design, expression and materiality of Site 5, to ensure the scheme is the correct fit for this site, in the context of its location within the wider envisaged Masterplan.

Site 5 comprises a commercial office building, designed to accommodate either a single or multiple tenants. The ground floor level contains the office entrance, café / restaurant units. Accessible terraces are provided at three levels (2nd, 3rd and 5th Floor) for office workers. The basement houses part of the plant area, with further plant areas on the roof.

The office entrance is from the proposed new public plaza, which is marked by a change in the facade treatment above, creating a double height recess. The office entrance will create a focal point and ensure there is a high level of footfall passing through and around the square.

The entrance to the café / restaurant units are directly from the proposed new public plaza. The café / restaurant units at ground floor also have entrances onto Moore Street, O'Rahilly Parade and Moore Lane to ensure there is activity onto each street adjoining Site 5. The café / restaurant unit facing Moore Lane has a secondary entrance from Moore Lane to capture footfall from the future proposed Metrolink station on the other side of Moore Lane.

There is no car parking proposed as part of this development. Bicycle facilities are to be accessed from O'Rahilly Parade and they serve as a secondary entrance for building users that approach the building by bicycle. This will create additional activity on O'Rahilly Parade along with the additional entrances proposed to the café / restaurant units.

The 1st to 5th floors accommodated the proposed office use. The floor plate size decreases in size gradually on the 2nd and 3rd floor stepping back from Moore Street and allowing for generous planted roof terraces which provide attractive views along Moore Street, O'Rahilly Parade and the newly created square south of the building. The terraces will also provide additional passive surveillance of the surrounding streets and proposed new public plaza.

Site 5 provides for office use from 1st to 5th floor of the proposed buildings. The building layout has been designed to accommodate either a single or multiple tenants.

The proposed office use, in combination with the other café / restaurant uses within Site 5 will help to create an active and vibrant retail streets and mixed-use urban quarter.

3no. café / restaurant units are proposed to provide a variety of dining and social opportunities at ground floor level of Site 5. These units proposed are: -

- **Unit 1:** A licensed café / restaurant with takeaway / collection facility with frontage onto the O’Rahilly Parade, Moore Lane and the new public plaza.
- **Unit 2:** A licensed café / restaurant with takeaway / collection facility with frontage onto the new public plaza.
- **Unit 3:** A licensed café / restaurant with takeaway / collection with frontage onto the O’Rahilly Parade, Moore Street and the new public plaza.

We refer to the Design & Access Statement, prepared by ACME Architects, provides a detailed breakdown of the café / restaurant provision proposed.

A ‘delivery hub’ is proposed in Site 5. It is located on O’Rahilly Parade adjacent the service bay for convenient access for deliveries.

In terms of the overall Dublin Central Masterplan it is an ambition to:

- Drive long term value provision of high quality commercial and retail space.
- A mix of uses that drives footfall and vibrancy 24/7 including retail and retail services, commercial office space, a variety of residential accommodation, hotel uses, food and beverage, and strategically located non-commercial uses.
- Provide a mix of retail uses including:
 - Independent/lifestyle retail and food & beverage uses along Moore Lane;
 - Medium Sized Unit (MSU) retail space along O’Connell Street (circa. 12,000 sq.ft.);
 - Flagship MSU retail space fronting Henry Street;
 - More local, artisan and service type retail on Moore Street.
- Incorporate a flagship retail offer within the existing Carlton

The Dublin Central Masterplan also considered the relationship with Moore Street providing new active frontage and connections to support the market.

In relation to Shopfront design we would highlight that individual shopfront signage cannot be determined until tenants are secured. Therefore, a general shopfront strategy has been devised by ACME Architects. We refer to the Masterplan Design Statement, prepared by ACME Architects for shopfront and signage design principles as submitted at application stage.

We also refer the Board to Section 4.7 in the Site 5 Design Statement, prepared by ACME as submitted at Planning Application Stage. The architectural treatment of shopfronts in this scheme has been carefully considered to closely reflect the character of adjoining shopfronts within the O’Connell Street Architectural Conservation Area; specifically around Henry Street and Moore Street.

As per Condition 14 of the Notification of Grant of Permission, the Applicant is committed to ensuring the protection of the Moore Street Markets as far as is practicable and provide support and liaise with market traders and representatives where ongoing trading is no longer possible, or construction works necessitate relocation of the market. The Applicant would request a similar condition be attached to any grant of permission for the Site 5 application.

In respect of public realm we would refer the Bord to discussions under Section 2.9 of this report.

2.4 Chapter 8 – Sustainable Movement & Transport

Policy SMT1 Modal Shift and Compact Growth

To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.

Policy SMT2 Decarbonising Transport

To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.

Objective SMT01 Transition to More Sustainable Travel Modes

To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).

Policy SMT3 Integrated Transport Network

To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region.

Policy SMT4 Integration of Public Transport Services and Development

To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.

Policy SMT5 Mobility Hubs

To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.

Policy SMT6 Mobility Management and Travel Planning

To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.

Policy SMT7 Travel Plans for New and Existing Developments

To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.

Policy SMT11 Pedestrian Network

To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.

Objective SMT02 Improving the Pedestrian Network

To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including

pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.

Policy SMT16 Walking, Cycling and Active Travel

To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.

Policy SMT18 The Pedestrian Environment

To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

Objective SMTO12 Cycle Parking Spaces

To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.

Objective SMTO14 Cycle Parking Facilities

To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density cycle parking facilities, as well as parking for cargo and adapted bicycles at appropriate locations, taking into consideration the NTA's GDA Cycle Network Plan, and Dublin City Council's Public Realm Strategy.

Policy SMT34 Street and Road Design

To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.

Policy SMT35 Traffic Calming and Self-Regulation Street Environments

To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that are suited to all users, including pedestrians and cyclists.

2.4.1 Applicant's Response

The Development Plan sets out that in order to maximise the use of public transport infrastructure and minimise car dependence, higher densities and interactive mixed uses will be encouraged within walking distance of public transport corridors and nodes (rail stations and interchanges) and at other key locations such as key district centres.

The proposed redevelopment of this brownfield city centre site would deliver mixed-use redevelopment which is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport. There is no car parking proposed in this case.

We refer the Bord to the Traffic Assessment and Travel Plan, prepared by Waterman Moylan Consulting Engineers as submitted as part of the application in respect of existing and future public transport,

pedestrian and cycling links to the site. The area is exceptionally well located in terms of accessibility by foot, by bicycle and to public transport, as generally described below: -

- Many of the streets in the immediate area have cycle lanes which provide direct access to the Dublin Strategic Cycle Network.
- There are several Dublin Bikes Stations in the vicinity at Jervis Street, Parnell Square North, Parnell Street, Princes Street and Cathal Brugha Street which are all within a 3 – 6 minute walk from the application site.
- The Luas Green line operates between Brides Glen at Cherrywood in Sandyford and Broombridge and the Luas Red Line operates between Saggart / Tallaght and the 3Arena / Connolly. The two lines intersect at the junction of O'Connell Street and Abbey Street adjacent to the south-east of the site due to the introduction of Luas Cross City. Red Luas and cross city Luas lines serve stops at Heuston Station, O'Connell Street and Parnell Square, which act as termini for numerous Dublin Bus services.
- Connolly Train Station is located c. 800 m (c. 10 – 12 minute walk) east of the site which allows interchange with DART services and Iarnród Éireann commuter services.
- Extensive bus services are available on O'Connell Street including Dublin Bus (31no. routes), private interurban routes and airport services. Aircoach operate a 24-hour service at 10-20 minute intervals through O'Connell Street from Sandyford, Greystones, Cork and Belfast. Citylink provides hourly services from Bachelor's Quay (c.200m) and Aston Quay (c. 400m) in each direction from Dublin Airport to Galway and Limerick. Wexford Bus operates frequent return services from Dublin Airport to Wexford via Custom House Quay (c. 700m) and George's Quay (c. 550m).
- O'Connell Street, Parnell Square East, Parnell Street and Parnell Square West to the north and east of the site are four of the essential primary links included in the proposed Bus Connects network.
- BusÁras is located c. 600m (c. 8 – 10 minute walk) east of the application site, which allows interchange with Dublin Bus services, Córas Iompair Éireann (CIÉ) regional bus services and private intercity bus services.
- A proposed Metrolink line (Metrolink Project – currently at railway order application stage) will provide for a high-capacity, high-frequency rail service between Dublin Airport and the LUAS Green Line at Charlemont, with stops proposed at both ends of O'Connell Street. Metrolink will have a stop under Site 2AB and Site 2C, the design of which will allow Metrolink to be developed independently by TII. The future development of Site 2AB and Site 2C will include Metrolink Enabling Works (MEW) to facilitate the future implementation of the Metrolink Station (see Section 6 of the Planning Report as submitted as part of the application for further detail).

This level of accessibility supports the development of a sustainable higher density community in the North Inner City that is connected both locally and to the wider Dublin environs.

A Scenario Testing & Development Design Report, prepared by Space Syntax, on existing pedestrian movement patterns and pedestrian numbers, underlines the inhibiting and impermeable nature of the existing Masterplan site in its current format for pedestrian movement was submitted at application stage. This has informed the design process of the Masterplan as a whole. A core principle of the Masterplan is the introduction of greater sub-division within the overall area, through the integration of additional new streets, laneways / passageways and public spaces. The resultant block pattern is intended to present a more permeable and finer urban grain, offering choice of movement and activity, within a coherent and legible public realm composed of an accessible and attractive network of streets and open spaces. The North East Inner City SDRA reflects and provides a statutory footing for, the permeability strategy of the Dublin Central Masterplan (please refer to section 2.8 of this report for further discussion of the SDRA Guiding Principles for O'Connell Street).

2.5 Chapter 11 – Built Heritage and Archaeology

Policy BHA5 Demolition of Regional Rated Building on NIAH

That there is a presumption against the demolition or substantial loss of any building or other structure assigned a 'Regional' rating or higher by the National Inventory of Architectural Heritage (NIAH), unless it is clearly justified in a written conservation assessment that the building has no special interest and is not suitable for addition to the City Council's Record of Protected Structures (RPS); having regard to the provisions of Section 51, Part IV of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Policy BHA7 Architectural Conservation Areas

(a) To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area, and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.

(b) Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA. (c) Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.

(d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.

(e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.

(f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within ACAs.

All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access, or requires removal to protect other specimens from disease.

Policy BHA8 Demolition in an ACA

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of the ACA except in exceptional circumstances where such loss would also contribute to a significant public benefit.

Policy BHA11 Rehabilitation and Reuse of Existing Older Buildings

(a) To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment.

(b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.

(c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.

Policy BHA24 Reuse and Refurbishment of Historic Buildings

Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership.

2.5.1 Applicant's Response

Site 5 itself lies outside the boundary of the O'Connell Street & Environs ACA and there are no protected structures on the site accommodating the buildings proposed.

The Site 5 Architectural Heritage Impact Assessment, prepared by Molloy Associates, has assessed the existing buildings within this site, and concluded that there are structures with limited or no significance from a conservation point of view. However, the public realm defined by Henry Place, Moore Lane and O'Rahilly Parade is classified as being of high significance.

We refer the Board to the following reports that accompanied the application and which are important in understanding how Site 5 has been conceived, considered and further refined in order to ensure that it will make a positive contribution to the architectural and civic design quality in this context: -

- Architects Design & Access Statement, prepared by ACME Architects, provides an in-depth analysis of the site and surrounding historic and existing context, which has informed the architectural design of Site 5.
- Conservation Plan and Architectural Heritage Impact Assessment, prepared by Molloy & Associates Conservation Architects, which respectively describe the existing built environment at Site 5 and considers the impact of the proposed building on the architectural heritage and setting of the site and its surroundings.
- EIAR Chapter 15: Cultural Heritage (Architectural), prepared by Molloy & Associates Conservation Architects.
- Chapter 12: Landscape and Visual Impact Assessment of the accompanying EIAR, prepared by ARC, which includes a visual impact assessment of Site 5, having regard to the pattern of change and to the existing historic and urban landscape that characterises the site location.

2.6 Chapter 12 – Culture

Policy CU7 Cultural Clusters and Hubs

To support existing, and encourage the growth of, emerging cultural clusters and hubs within the city, which bring together cultural activities interlinked with supporting uses (such as restaurants, retail, galleries and venues) to create vibrant, defined cultural quarters and communities within the city that give a variety of cultural experiences to all.

Policy CU12 Cultural Spaces and Facilities

To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments such as in basement or rooftop spaces where suitable to meet the needs of an increased population within the city.

Policy CU15 Cultural Uses in the Design and Uses of Side Streets

To encourage the rejuvenation of quieter urban streets by the inclusion of cultural uses both in the design and uses of side streets.

Objective CU025

All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*

**Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.*

2.6.1 Applicant's Response

The overall Dublin Central Masterplan will bring together cultural activities interlinked with supporting uses, such as a Hotels, Retail uses, Residential accommodation, Café/Restaurant units, cultural spaces and Office Spaces to create vibrant, defined a cultural quarter and community within this urban block.

The Dublin Central Masterplan rejuvenates quieter urban streets by introducing new pathways and the inclusion of cultural uses both in the design and uses of side streets.

It is noted that Objective CU025 refers to "all new regeneration areas (SDRAs)" in the context of providing community, arts and culture spaces. The Dublin Central Masterplan area is located within SDRA 10 – Northeast Inner City and identified as a 'Key Opportunity Site'. The Dublin Central Masterplan covers an area of c. 2.2 Ha and will see the regeneration and revitalisation of the urban block broadly bound by Parnell Street and O'Rahilly Parade to the north, O'Connell Street Upper and Henry Place to the east, Henry Street to the south and Moore Street to the west.

While the Site 5 planning application/appeal is currently being assessed in isolation, it is also considered appropriate that the provision of community, arts and culture spaces should be assessed in the context of the wider Dublin Central Masterplan.

Having regard for the Development Plan requirements, the following sets out a calculation for the provision for community, arts and culture spaces space for both Site 5 and within the wider Dublin Central Masterplan context.

Use	Site 1	No. 61	Site 2	Site 3	Site 4	Site 5	Total
Proposed Culture / Community Space – RFI			553 sq. m				553 sq. m
Pocket Square at the Reading Room			120 sq. m				120 sq. m
Public Square					1,085 sq. m	168 sq. m	1,253 sq. m
Cultural / Gallery / Café – The White Building				123 sq. m			123 sq. m
Extension to National Monument – A Cultural Facility					60 sq. m		60 sq. m
Historic Paving – Across Masterplan							690 sq. m
New streets / passageway		68 sq. m	650 sq. m	410 sq. m			1,128 sq. m
Total Cultural / Social Space	TBC	68 sq. m	1,323 sq. m	533 sq. m	1,145 sq. m	168 sq. m	3,927 sq. m
Metrolink Public Areas							9,812 sq. m

% of total Cultural Space in Site 5 in respect of the GFA of Site 5	
Total GFA of Site 5	6,478 sq. m
Total Site 5 Cultural GFA	168 sq. m
% of Cultural / Social Space of Site 2 GFA	2.5 %
% of total Cultural Space across Dublin Central in respect of the GFA of Site 5	
Total GFA of Site 5	6,478 sq. m
Total Cultural / Social Space (Including outdoor spaces)	3,927 sq. m
% of Cultural / Social Space of Site 3 GFA	60%
% of Cultural Space Across the Dublin Central Site (2-5)	
Total DCP GFA (excluding Site Enabling Works)	75,916 sq. m
Total Cultural / Social Space	3,927 sq. m
% of Cultural / Social Space of total GFA	5.2 %
% of total Cultural Space in Site 3 and Metro Link Public Areas in respect of the GFA of Site 3	
Total GFA of Site 5 Inc. MEW Site Enabling works	6,478 sq. m (No MEW Site Enabling Works included on site)
Total Site 3 Cultural GFA and Metro Link Public Areas	16,290 sq. m
% of Cultural / Social Space of Site 3 GFA	39%

% of Cultural Space including MEW Site Enabling Works Across the Dublin Central Site (2-5)	
Total GFA (Including Site Enabling Works)	85,728 sq. m
Total Cultural GFA and Metro Link Public Areas	13,739 sq. m
% of Cultural / Social Space of GFA	16%

As can be seen in the table above there is a number of indoor and outdoor cultural and community spaces proposed across the Dublin Central Masterplan, these are as follows: -

- 553 sq. m of cultural / community space is being proposed as part of the Site 2.
- In the Pocket Square at the Reading Room within Site 2 there is possibility for public artwork, informal gathering and possible seating for associated licensed restaurant / café units with takeaway / collection facility' at ground floor level of the Reading Room.
- In the Public Square (Site 4 & 5) there is possibility for public artwork, a range of events (theatre, cinema, performances etc.) and informal gatherings.
- The White Building (Site 3) – The proposed use envisages a cultural / gallery venue, with the café at ground floor and exhibition space extending to 1st floor. This would create a destination, interpretative and exhibition center, and place of interest for the general public, visitors and local residents. The proposed gallery exhibition space may host exhibitions and other events of contemporary social and cultural significance.
- The proposal seeks to retain and consolidate historic paving across the Masterplan site which will support the possibility of introducing a historic trail in cooperation with a Third Parties.

Section 12.5.7 – Culture in the Public Domain of the Development Plan notes that *“public spaces play a highly significant role in the public expression and cultural value of the city.”* It is envisioned that the public plaza (Site 4 & 5) would be capable of hosting open air events once implemented as noted above.

Furthermore, having regard for Objective CU037 – Street Art of the Development Plan there is an opportunity to use along the proposed wall to the rear of No. 61 O'Connell Street Upper (i.e. along the new passageway) for art installations. Any future artistic installation would be subject to agreement with DCC.

In summary, 2.5% of the Site 5 GFA is dedicated towards community, arts and cultural spaces. **In the context of the Dublin Central Masterplan, 5.2% area is dedicated towards community, arts and cultural spaces which is in excess of the minimum requirement set out under Objective CU025.**

Furthermore, we note that the MetroLink public areas comprise 11% of the total Dublin Central GFA (including site enabling works) before the other community, arts and cultural spaces are even considered. We respectfully submit that these public areas should be considered as part of the community space provided as part of this Development. **The community, arts and culture space together with the MetroLink public areas accounts for 16% of the Dublin Central Masterplan which is well in excess of the 5% noted under Objective CU025.**

To contextualise the application site / Dublin Central lands they are located on one of Ireland's premier streets at the heart of the city centre, with access to an abundance of community, arts and cultural spaces. The list below (not intended to be exhaustive) is some of the cultural attractions (a number of which are world renowned) within a short walk of the application site / Dublin Central lands: -

- The GPO (Landmark & Museum).
- Moore Street Market.
- Gate Theatre.
- James Joyce Centre.
- Dublin Writers Museum.

- Abbey Theatre.
- 14 Henrietta Street (Museum).
- Garden of Remembrance.
- The Academy.
- Ambassador Theatre.
- Hugh Lane Gallery (Charlemont House).
- The Spire.

Under the Urban Regeneration and Development Fund (URDF), the 'North Inner City Concept Area 1' is to receive €121.3 million in URDF funding for projects including: -

- The allocation of €12.7m towards the regeneration of the National Monument at Nos. 14 – 17 Moore Street, including the structural and restoration works on the four houses **to facilitate the creation of a 1916 Commemorative Centre** and associated museum building to the rear of the historic buildings.
- Moore Street Public Realm Renewal works to include lighting, **public art**, paving, stalls, signage, to reactivate one of the City's most important trading streets.
- Parnell Square Public Realm works to create a **civic space linking within the Parnell Square Cultural Quarter buildings, including new city library** (work have commenced on the new library).

The first phase of construction on the Dublin City Library commenced in November 2022. Furthermore, works on the 1916 Commemorative Centre are due to commence imminently and due to be completed by 2026 (as reported in the media May 2023). The proposed public plaza (Site 4 & 5) as part of the Dublin Central Masterplan will link directly to the rear of the 1916 Commemorative Centre, providing direct access to this cultural amenity.

As such, given the provision of community, arts and cultural spaces across the Dublin Central Masterplan and the significant extent of existing cultural facilities within the wider context of these lands it is considered that that the provisions of Objective CUO25 are more than adequately met.

2.7 Chapter 13 – Strategic Development Regeneration Area

O'Connell Street/Moore Street Civic/Cultural Hub

*In recognition of the historic built form and history of the area and the potential for public interaction given its key location in the north retail core. With proximity to the emerging cultural quarter around Parnell Square, and its associated range of arts and literary attractions, this hub would act as a natural extension to the existing cultural quarter extending its reach, blending with a new mix of uses. With excellent transport access, this precinct will become even more accessible to the wider public when planned public transport improvements are delivered over time. The Moore Street market will become a re-energised market street, with a significantly improved public realm and act as a gateway, and through route, to the historical assets of the area, to create synergies to benefit the entire city block, breathing new life to the area. (*The historical assets are not limited to Moore Street/Moore Lane, but include O'Connell Street & the GPO)*

Housing

- *To promote an increased residential population and the successful integration of new and established residents and communities.*
- *To ensure that new residential developments accord with the indicative layout illustrated in the framework, supporting social, community and amenity infrastructure/services in the local area.*
- *To promote a variety of house types and tenures, avoiding an over-concentration of specialist accommodation such as tourist and student accommodation, thereby, ensuring capacity for the growth of balanced residential communities.*

- *To promote the development of high quality residential mews dwellings at appropriate locations and in accordance with relevant standards, thereby, unlocking the residential potential of laneways, improving public realm, and increasing pedestrian permeability where possible.*

Education and Employment

- *To encourage local employment, where the appropriate skills are available, on construction projects in the area.*
- *To support the use of educational buildings within the area for evening and weekend use in the provision of education related services and recreational use.*
- *In association with relevant agencies, to encourage the development of Social Enterprise in the area by promoting the development of new enterprise space / starter units in appropriate locations.*
- *To support the development of a heritage/tourist/ literary trail (as identified in the Mulvey Report) in association with relevant agencies such as Tourism Ireland, Waterways Ireland, the NTA, and in consultation with key stakeholders.*

Guiding Principles for Key Opportunity Sites

O'Connell Street/Moore Street Civic/Cultural Hub

1 – O'Connell Street to Moore Lane incorporating Carlton Site

This 2.2 ha site incorporates buildings extending from O'Connell Street, Ireland's premier street, to Moore Street, including Moore Lane, O' Rahilly Parade, Henry Street North and Henry Place. It is identified within the Guiding Principles Map as a civic/cultural hub because of both its historical/cultural importance and because of its potential as a focus for quality retail and mixed-use development. The site is of significant historical importance given its association with the 1916 Easter Rising, and Moore Street is also well known for its open-air fruit and vegetable market. The area has the potential to be transformed through heritage-led, mixed-use regeneration that acknowledges and responds creatively to the cultural roles and historical significance of this centrally located site.

Scheme design shall be based on a comprehensive masterplan that incorporates a convenient access route to the planned Metrolink stop, quality connections across the site, and a cultural interpretative element.

Any final proposal must incorporate at least one new east-west pedestrian route interlinking to at least two new civic spaces within the block, utilising the existing lane structure for cross connections.

Masterplan proposals should hence incorporate the following:

- *New pedestrian connections linking both O'Connell St. to Moore St. via a new public square, and also Henry Street to Henry Place/Moore Lane.*
- *Exceptional architectural design to match the importance of this city block that will effectively interlink the historic GPO with the emerging cultural quarter at Parnell Square.*
- *A new civic square, open to the public, and quality pedestrian access to the proposed Metrolink station.*
- *An appropriate mix of uses to ensure activity both day and night. Active ground floors should front public routes.*
- *The restoration of a significant element of the Upper O'Connell Street streetscape, including the former Carlton Cinema façade, No 42 O'Connell Street, and Conway's Pub on Parnell Street.*
- *Heritage –led retention and restoration of all pre-1916 buildings and fabric along Moore Street.*
- *Acknowledge the urban architectural and historical context and complement the scale and design of the National Monument at Nos. 14 -17 Moore Street and its reuse as a commemorative visitor centre (URDF Government funding relates).*
- *Moore Street Public Realm Renewal works to include lighting, public art, paving, stalls, signage (URDF Government funding relates).*

- *Promote a high quality street market that firstly offers a diverse food range, speciality food with outdoor seating serving same that knits with the proposed Public Realm Renewal works proposed for the area and secondly a high quality urban environment that promotes a mix of uses, including residential at upper levels to ensure passive supervision and continual activity.*
- *A detailed phasing plan to address different stages of construction, co-ordinated as necessary with other planned works that may take place during the planned construction period.*

Proposals for this area must also have regard to:

- *The policies and provisions of the O'Connell Street Architectural Conservation Area (ACA), 2001, and the Scheme of Special Planning Control for O'Connell Street & Environs 2016, including any amendments thereto, along with those of the proposed Draft Moore Street Architectural Conservation Area or similar where adopted.*
- *Protected Structures (as provided on the City Council's Record of Protected Structures (RPS)) and the policies and objectives of this development plan for such structures, together with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).*
- *Ministerial Recommendations for the proposed addition of buildings and other structures to the City Council's RPS, provided under Section 53 of the Planning and Development Act, 2000 (as amended), together with the relevant policies and objectives for same in this development plan.*
- *The content of the Moore Street Advisory Group's 2021 report to the Minister.*
- *Proposals for this area must also have regard to:*
- *The policies and provisions of the O'Connell Street Architectural Conservation Area (ACA), 2001, and the Scheme of Special Planning Control for O'Connell Street & Environs 2016, including any amendments thereto, along with those of the proposed Draft Moore Street Architectural Conservation Area or similar where adopted.*
- *Protected Structures (as provided on the City Council's Record of Protected Structures (RPS)) and the policies and objectives of this development plan for such structures, together with the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).*
- *Ministerial Recommendations for the proposed addition of buildings and other structures to the City Council's RPS, provided under Section 53 of the Planning and Development Act, 2000 (as amended), together with the relevant policies and objectives for same in this development plan.*
- *The content of the Moore Street Advisory Group's 2021 report to the Minister.*

2.7.1 Applicant's Response

The application site now falls within the Strategic Development Regeneration Areas (SDRA) 10 – Northeast Inner City (NEIC). The Development Plan states that: -

"Given the significance of this area and its regeneration potential, Dublin City Council is committed to preparing a Local Area Plan for this SDRA during the lifetime of this development plan, and, therefore, this SDRA forms an interim strategy and sets guiding principles for the LAP."

Whilst DCC are committed to preparing an LAP, we understand that no steps have been taken to commence the preparation of said LAP to date.

In the absence of a LAP, a Masterplan for the entirety of the Dublin Central site has been undertaken. We refer the Board to the Masterplan Design Statement, prepared by ACME Architects which sets out the frameworks for the redevelopment of the overall land holding. Further detail with regard the Masterplan is set out in Section 6 of the Planning Application Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.

Notwithstanding, it is noted that the Dublin Central lands are identified as a 'Key Opportunity Site' within the SDRA. We set out below how the proposed development (and the wider Dublin Central Masterplan) closely align with the aspirations set out in the SDRA.

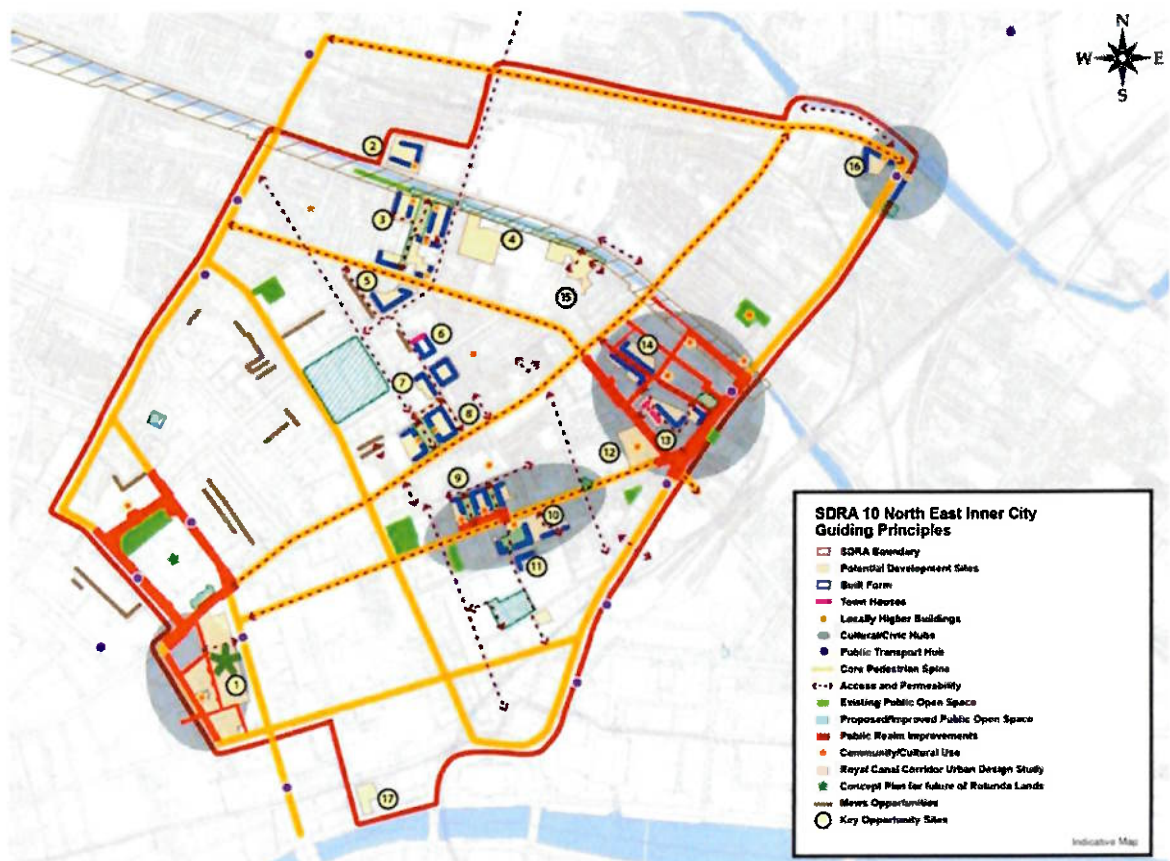


Figure 1: Extract from Figure 13-12 of the Dublin City Development Plan 2022 – 2028 with Dublin Central marked indicatively with a green star, identifying the Dublin Central lands as a 'Key Opportunity Site 1' within SDRA 10.

Guiding Principles for Key Opportunity Sites

With Regard SDRA 10, the Development Plan states that: -

"The area has the potential to be transformed through heritage-led, mixed-use regeneration that acknowledges and responds creatively to the cultural roles and historical significance of this centrally located site.

Scheme design shall be based on a comprehensive masterplan that incorporates a convenient access route to the planned Metrolink stop, quality connections across the site, and a cultural interpretative element.

Any final proposal must incorporate at least one new east-west pedestrian route interlinking to at least two new civic spaces within the block, utilising the existing lane structure for cross connections."

We refer the Planning Authority to the Masterplan Design Statement, prepared by ACME Architects submitted at application stage which sets out the frameworks for the redevelopment of the overall land holding. Further detail with regard the Masterplan is set out in Section 6 of the Planning Application Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants as submitted at application stage. This discusses the masterplan strategy in full detail.

As noted above the Development Plan states that any masterplan proposals should hence incorporate a number of items these are responded to below:

It should be noted that a new square forms part of the Site 5 proposal and is also in part the subject of the decision to grant permission for Site 4 (DCC Reg. Ref. 2862/21) refers, currently subject to First and Third Party appeal (ABP Ref. ABP-312642-22). The square is located within the heart of the Dublin Central Masterplan and will be highly accessible and is situate directly opposite the future O'Connell Street MetroLink entrance on Moore Lane.

The ground floor uses within the proposal have been designed to support the Moore Street Market and associated retail units, as well as integrating into the wider Masterplan. The office at the upper floors will bring workers into this area of central Dublin during the working week, and they will be able to take advantage of the existing and proposed commercial uses around the site. This approach has been replicated across the Masterplan and generally considered to the Planning Authority.

A conservation plan was also prepared for the Dublin Central Masterplan by Molloy & Associates Conservation Architects, as submitted at application stage, we would refer the Board to same for details on the architectural and historical context of the Dublin Central Masterplan in its entirety.

In relation to Site 5 specifically, we refer the Bord to Conservation Plan and Architectural Heritage Impact Assessment, prepared by Molloy & Associates Conservation Architects for Site 5 as submitted at application stage which respectively describe the existing built environment at Site 5 and consider the impact of the proposed building on the architectural heritage and setting of the site and its surroundings.

The Dublin Central Masterplan considered the relationship with Moore Street providing new active frontage and connections to support the market and thus supporting the principals of SDRA 10.

We refer the Bord to the Outline Construction & Demolition Management Plan and Preliminary Construction Traffic Management Plans, prepared by Waterman Moylan Consulting Engineers submitted with the planning application for site 5 for further details on different stages of construction, co-ordinated as necessary with other planned works that may take place during the planned construction period.

It is evident from the above that the Dublin Central Masterplan is in line with the guiding principals for Key Opportunity Sites, in this case O'Connell Street/Moore Street/Cultural Hub.

2.8 Chapter 15 – Development Standards

2.8.1 Section 15.4.1 - Healthy Place Making

All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and health communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city as set out in Chapters 4 and 5.

Key principles to consider are:

- *The contribution to the public realm for the benefit and / or enjoyment of the locality.*
- *The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets.*
- *The use of high quality materials and finishes including hard and soft landscaping.*
- *The orientation of open space and the accessibility to daylight and sunlight.*
- *Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets.*
- *The accessibility of the development and the traffic calming measures in place in accordance with DMURS.*
- *The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc.*
- *Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.*

2.8.2 Section 15.4.2 Architectural Design Quality

Imaginative, innovative and contemporary architecture is encouraged in all development proposals, provided that it respects Dublin's heritage and local distinctiveness and enriches the city environment. Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.

Through the use of high quality materials and finishes and the appropriate building form, the architectural quality of development should positively contribute to the urban design and streetscape, enhancing the overall quality of the urban environment

Key principles:

- *The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site.*
- *The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered.*
- *The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting.*
- *The suitability of the proposed design to its intended landuse and the wider land-use character of the area, along with its relationship with and contribution to the public realm.*
- *The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special interest and important views and that the design incorporates high quality detail, materials and craftsmanship.*
- *The need to protect and enhance natural features of the site, including trees and any landscape setting.*
- *The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling.*
- *The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces.*
- *Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity.*

2.8.3 Section 15.4.3 Sustainable and Climate Action

Development proposals will be expected to minimise energy use and emissions that contribute to climate change during the lifecycle of the development with an aspiration towards zero carbon, and ensure the reduction, re-use or recycling of resources and materials, including water, waste and aggregates.

To minimise the waste embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new build.

Key sustainable design principles:

- *Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies.*
- *Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain.*
- *Materials should be selected which are sustainably sourced and existing materials reused and recycled wherever possible. The use of green building materials and low embodied energy products such as low carbon cement and recycled materials is encouraged.*

- *Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10.*
- *Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council’s Surface Water Management Guidance – see policy SI25.*
- *New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council’s Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23.*
- *For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA11, CA15, CA16, CA17, CA18 and Section 15.7.2 below.*

2.8.4 Section 15.4.4 Inclusivity and Accessibility

Development proposals, including all new large scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.

Within new buildings and spaces, this will include consideration of issues such as provision of level circulation, lifts, doors widths, surface finishes, signs and information.

The historic environment poses particular challenges for fully delivering all-inclusive access, however, there will almost always be scope to improve access for all without compromising the character of an existing structure of special interest.

2.8.5 Section 15.5.1 Brownfield, Regeneration Sites and Large Scale Development

These sites often contain derelict or vacant buildings which are underutilised and in need of redevelopment. Brownfield lands have the ability to regenerate and rejuvenate large portions of the city through redevelopment.

Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale, regeneration and brownfield development:

- *To encourage innovative, high quality urban design and architectural detail in all new development proposals.*
- *To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.*
- *To respect and enhance existing natural features of interest.*
- *To contribute to the streetscape creating active and vibrant public realm.*
- *To create animation and create activity at street level and vertically throughout the building.*
- *To provide for appropriate materials and finishes in the context of the surrounding buildings.*
- *To ensure land contamination is appropriately dealt with and mitigated against.*
- *To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.*
- *To create new compositions and points of interest.*
- *To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area.*
- *To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.*
- *To prioritise pedestrian and cycle movements in connection with public transport infrastructure.*

- *To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes.*
- *To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.*
- *Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.*

2.8.6 Section 15.5.4 Height

Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.

The following criteria are noted from Appendix 3:

Dublin Context

There are considered to be three general categories of height in the Dublin Context.

- *Prevailing Height: This is the most commonly occurring height in any given area. It relates the scale, character and existing pattern of development in an area. Within such areas, there may be amplified height. This is where existing buildings within the streetscape deviate from the prevailing height context, albeit not to a significant extent, such as local pop up features. Such amplified height can provide visual interest, allow for architectural innovation and contribute to a schemes legibility.*
- *Locally Higher Buildings: These are buildings that are significantly higher than their surroundings and are typically up to 50 metres in height. Higher buildings can act as Local or District landmarks.*
- *Landmark/Tall Buildings: A landmark or tall building is one that is a significant intervention in the cityscape and skyline. They are typically located in an area that denotes a specific function such as a public transport interchange or a key urban quarter/ regeneration site. Landmark/tall buildings are typically in excess of 50 metres in height, of exceptional architectural quality, can help people navigate through the City and form memorable reference points.*

At a strategic level, Dublin City has an intrinsic quality as a predominantly low rise city. There is a recognised need to protect conservation areas and the architectural character of existing buildings, streets and spaces of artistic, civic or historic importance. In particular, development proposals must be sensitive to the historic city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic squares and the canals. It is important to protect the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity. Opportunities for height will be promoted on sites identified in section 4 below and in accordance with the performance criteria set out in Tables 3 and 4.

Identification of Areas for Increased Height and Density

The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, Key Urban Villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development.

The Building Height Guidelines note that general building heights of at least three to four storeys, coupled with appropriate density in locations outside what is defined as city centre, and which would include suburban areas, must be supported in principle at development plan level. The guidance also states that within the canal ring in Dublin, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of certain criteria.

In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled areas

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of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height.

As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance based criteria set out in Table 3.

Key criteria which all proposals for increased urban scale and height must demonstrate include:

The potential contribution to the development of new homes, economic growth and regeneration in line with the compact urban growth principles set out in the NPF and Project Ireland 2040.

- *Proximity to high quality public transport connectivity, including key public transport interchanges or nodes.*
- *Proximity to a range of employment, services and facilities.*
- *Provision of adequate social and community infrastructure.*
- *The availability of good walking, cycling and public transport infrastructure.*
- *Appropriate mix of uses, housing typologies and tenures.*
- *The provision of high quality public open space and public amenities.*
- *The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.*
- *That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed.*
- *Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character.*
- *Adequate infrastructural capacity.*

In accordance with SPPR 1, the following locations are identified as generally suitable and appropriate for accommodating a more intensive form of development, including increased height.

City Centre and within the Canal Ring (inner suburbs)

In general, and in accordance with the Guidelines, a default position of 6 storeys will be promoted in the city centre and within the canal ring subject to site specific characteristics, heritage/environmental considerations, and social considerations in respect of sustaining existing inner city residential communities. Where a development site abuts a lower density development, appropriate transition of scale and separation distances must be provided in order to protect existing amenities.

Proposals for increased height within key sensitive areas of the city including the city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic Georgian core and squares and the canals etc. must demonstrate that they do not have an adverse impact on these sensitive environments and that they make a positive contribution to the historic context. Heights greater than 6 storeys within the Canal Ring will be considered on a case by case basis subject to the performance criteria set out in Table 3.

Masterplan

A design-led approach to optimise density and height is advocated and this should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form. In considering higher density proposals including buildings of enhanced height, international best practice indicates that it is possible to create successful places based around streets and a variety of urban typologies, including houses and medium-rise apartment blocks, as well as some carefully integrated taller buildings. Schemes that use urban typologies of 4 – 8 storeys can create better homes and neighbourhoods at surprisingly high densities, and are more cost-effective than other solutions.

There will be a requirement that for any significant scheme (on sites greater than 0.5ha) seeking to increase densities and height that a masterplan is prepared. The masterplan should provide a vision for the development of the entire site area, including how new buildings, streets, blocks, pedestrian and cycling routes, parks, and publically accessible and private open spaces will fit within the existing and

planned context. It should include urban design studies to inform the architectural approach and to allow for the early testing of open space quantum, sunlight, daylight, visual impact and wind effects. Proposals seeking to optimise densities need to demonstrate how they assist in delivering a vibrant and equitable neighbourhood - walkable, compact, green, accessible, mixed and balanced - responding positively to the existing or emerging context. Where extensive development is proposed, clear phasing and sequencing of development should be set out to ensure the appropriate delivery of social and physical infrastructure in tandem with the development. Such masterplans should also incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place to service new development – see Appendices 11, 12 and 13 of the plan.

Higher density proposals including enhanced building height should be accompanied by a landscape and visual impact assessment with appropriate computer generated images (CGI's) and photomontages to demonstrate how the development will assimilate appropriately with the existing urban context.

2.8.7 Section 15.5.6 Plot Ratio and Site Coverage

Table 2: Indicative Plot Ratio and Site Coverage

Area	Indicative Plot Ratio	Indicative Site Coverage
Central Area	2.5-3.0	60-90%
Regeneration Area	1.5-3.0	50-60%
Conservation Area	1.5-2.0	45-50%
Outer Employment and Residential Area	1.0-2.5	45-60%

2.8.8 Section 15.5.8 Architectural Design Statement

Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary. Statements may also be required for large scale commercial development. An Architectural Design Statement is an informative, illustrative document that clearly describes the development proposal, the context in which the development is set and the design rationale for the scheme. Design statements should analyse the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development including the building massing, material and finishes and building articulation, (see also Policy SC23).

2.8.9 Section 15.5.9 Models and Photomontages

In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted. The inclusion of excessive sunshine, blue sky and any other detailing or colouring which may distort the reliability of the photomontages should be avoided.

2.8.10 Section 15.6 Green Infrastructure and Landscaping

Planning applications will be required to address climate action as part of the overall design of the development and incorporate green infrastructure techniques. All new developments in the city are encouraged to incorporate an ecosystem services approach as a key instrument in achieving sustainable climate change action in accordance with Policy GI5 and GI6.

The proposal should indicate how existing natural features of the site will inform sustainable urban form and should include the following:

- *Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.*
- *The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city's green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and 'stepping stones' to ensure biodiversity protection.*
- *Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.*

2.8.11 Section 15.7.3 Climate Action and Energy Statement

In order to comply with the policies set out in Section 3.5.2 'The Built Environment' and Section 3.5.3 'Energy' of Chapter 3, proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.

The purpose of this statement is to demonstrate how low carbon energy and heating solutions have been considered as part of the overall design and planning of the proposed development. Having regard to the above, the statement, which shall be prepared by a certified engineer, shall address:

- *the technical, environmental and economic feasibility of on-site renewable energy generation including solar PV and small scale wind power*
- *the technical, environmental and economic feasibility of at a minimum, the following high-efficiency alternative energy supply and heating systems:*
 - *decentralised energy supply systems based on energy from renewable and waste heat sources;*
 - *co-generation (combined heat and power);*
 - *district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources;*
 - *heat pumps;*
 - *include an assessment of embodied energy impacts.*

2.8.12 Section 15.17.5 Shopfront and Façade Design

Shopfront design plays a key part in contribution to the quality of the public realm. Attractive facades and shopfronts have the ability to rejuvenate the streetscape and create an attractive public realm environment.

Shopfront signage should:

- Be located at fascia level.
- In the case of shop blinds, comprise traditional retractable canvas awning signs of Shopfronts and Other Business Premises.
- The signage relating to any commercial ground floor use should be contained within the fascia board of the shopfront.
- The lettering employed should be either on the fascia, or consist of individually mounted solid letters mounted on the fascia. The size of the lettering used should be in proportion to the depth of the fascia board.
- Signage internal to the premises, including interior suspended advertising panels, which obscure views into the shop or business and create dead frontage onto the street shall not normally be permitted.
- Corporate signs will only be permitted where they are compatible with the character of the building, its materials and colour scheme and those of adjoining buildings.
- Advertisements and signs relating to uses above ground floor level should generally be provided at the entrance to the upper floors, in a form and design which does not detract from or impinge upon the integrity of the ground floor shopfronts, or other elevation features of the building.
- Shopfronts sponsored by commercial brands will generally not be permitted. Proposals for shopfront signage shall have regard to the contents of the Retail Design Manual, 2012, Dublin City Council's Shopfront Design Guide, 2001 and the O'Connell Street Area Shopfront Design Guidelines, 2003,

2.8.13 Car Parking Standards

The application site falls under Zone 1 (Map J of the Development Plan). The table below sets out the maximum car parking standards for various uses envisioned as part of Site 5.

As noted above Policy MT2 seeks to: -

*"...continue to **promote modal shift** from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport..."*

2.8.14 Bike Parking Standards

The subject site falls under Zone 1 (Map J of the Development Plan). The table below outlines the bicycle parking requirements per Table 1 of Appendix 5 of the Dublin City Development Plan

Land Use	Cycle Spaces (Long Term)	Cycle Spaces (Short Stay/Visitor)
Offices	1 no. space per 75 sq. m GFA	To be determined by the planning authority on cases by case basis
Restaurants and Cafes	1 no. space per 5no. staff	1no. space per 10no. seats

2.8.15 Applicant's Response

Land Use

Under the Dublin City Development Plan 2022 – 2028, as may be seen from the zoning map extract below, the site is subject to the zoning objective, "Z5 – City Centre", in common with much of the city centre area in the immediate vicinity of the application site. The land use objective for the Z5 zoning seeks: -

"To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity."

Section 14.7.5 of the City Development Plan includes further guidance on Z5 zoned lands. The following points are of note: -

- The primary purpose of this use zone is to sustain life within the centre of the city through intensive mixed-use development.
- The strategy is to provide a dynamic mix of uses which interact with each other, help create a sense of community, and which sustain the vitality of the inner city both by day and night.
- Ideally, a mix of uses should occur both vertically through the floors of buildings as well as horizontally along the street frontage. A general mix of uses, e.g. retail, commercial, residential, will be desirable throughout the area and active, vibrant ground floor uses promoted. On Category 1 retail streets, retail should be the predominant ground floor use.
- As a balance and in recognition of the growing residential communities in the city centre, adequate noise reduction measures must be incorporated into development, especially mixed-use development, and regard should be given to the hours of operation.

The Development Plan indicates that a wide range of uses is to be provided in this zoning area, which is sustainable and within easy reach of services, open space, facilities and public transport.

The following uses are considered 'Permissible' and 'Open for Consideration' under the Z5 zoning.

Permissible Uses
Amusement / leisure complex, beauty / grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, café / tearoom, childcare facility, civic offices, community facility, conference centre, craft centre / craft shop, creative, artistic, recreational building and uses, cultural / recreational building and uses, cultural, delicatessen, education, embassy office, enterprise centre, financial institution, funeral home, guesthouse, home-based economic activity, hostel (tourist), hotel, industry (light), internet café / call centre, live-work units, media-associated uses, medical and related consultants, mobility hub, nightclub, office , off-licence, off-licence (part), open space, place of public worship, primary health care centre, public house, public service installation, recycling facility, residential, restaurant , science and technology-based industry, shop (district), shop (local), shop (major comparison), shop (neighbourhood), sports facility and recreational uses, student accommodation, take-away, training centre, veterinary surgery, warehousing (retail/non-food) / retail park.
Open for Consideration Uses
Advertisement and advertising structures, betting office, Build to Rent residential, car park, car trading, civic and amenity / recycling centre, household fuel depot, laundromat, motor sales showroom, outdoor poster advertising, petrol station, postal hotel / motel, transport depot.
SLA Emphasis added.

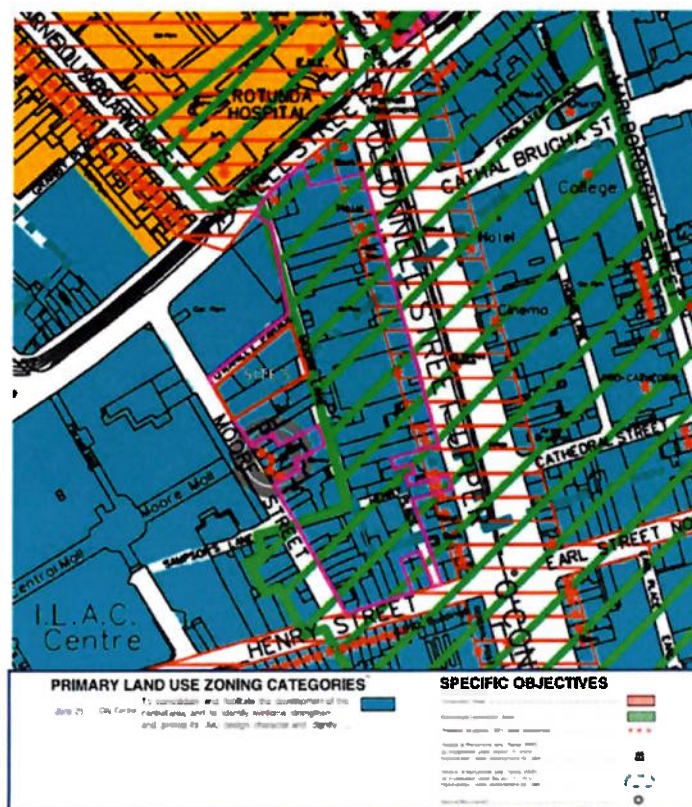


Figure 2: Extract from Map E of the Dublin City Development Plan 2022 – 2028 with Site 5 outlined in red and the masterplan in purple. Please refer to Architects Drawings for definitive site outlines including offsite work for facilitate construction activities and infrastructural works.

Site 5 comprises office and café / restaurant uses, which are all permissible in principle under the Z5 zoning.

The scheme is representative of plan-led, high-quality urban and architectural design, which seeks to achieve the sustainable regeneration of an underutilised brownfield site. It delivers an appropriate mix of uses, both vertically and horizontally, with street activating café / restaurant at ground floor level, complemented by office use at upper floors.

3no. café / restaurant units are proposed at Site 5 to provide a variety of dining and leisure opportunities. The entrance to the café / restaurant units are directly from the proposed new public plaza. The café / restaurant units are proposed at ground floor to take advantage of the south facing public plaza. Entrances to all the units at ground floor are proposed facing each street (Moore Street, O'Rahilly Parade and Moore Lane) to ensure streets are animated and activity is generated.

The range, balance and configuration of uses proposed for Site 5 can serve to attract and sustain desirable activity during the day and night, to create a City Centre destination that is commercially competitive and attractive, inclusive and vibrant.

It should be noted that in the Planners Report for Site 5 noted the following of relevance to Chapter 6 of the Development Plan: -

"Taking into account the dilapidated and underutilised nature of the subject site, it is considered that the proposed development on the Z5 lands is acceptable in principle, contributing to the provision of office accommodation with the area and is considered an appropriate use for the site."

The range, balance and configuration of uses as part of Site 5 can serve to attract and sustain desirable activity during the day and night, to create a City Centre destination that is commercially competitive and attractive, inclusive and vibrant.

Place Making

It is an ambition of the Dublin Central Masterplan to secure well-designed public realm that drives footfall, increases dwell time and provides commercialisation opportunities.

Site 5 forms part of the wider Dublin Central Masterplan, which describes the redevelopment of the area between O'Connell Street, Moore Street, Parnell Street and Henry Street, which includes the creation of new east-west and north-south pedestrian links, improving the public realm and the creation of new public spaces. Existing streets are maintained, and the new streets break up large urban blocks, allowing greater pedestrian permeability and the creation of new public spaces. By increasing permeability the existing streets can be revitalized with activity and animation, and can be linked to the surrounding street network, including O'Connell Street, Henry Street, and Moore Street and the Market. The new lanes provide glimpses and views into the site, to the retained historic fabric and complementary new development. Changes in the orientation of the streets and lanes mean that there are limited views through the site, but that glimpses and angled views offer intrigue and interest. Within the Masterplan a variety of architects have worked together to develop different Sites, but with a shared understanding of the Masterplan, massing, scale, and material use.

As part of the wider Masterplan Site 5 provides part of the new public square, shared with Site 4. The new square will be south facing with excellent sunlight from Spring to Autumn, and south facing cafés and restaurants will be able to spill out into the square to take advantage of the orientation. This square will be set between O'Connell Street, the heart of Dublin, and Moore Street, a key market street, creating a new place linking these two key streets.

Along Moore Street Site 5 responds to the historic plot width, storey height and materials to support the character of the existing market street. Along O'Rahilly Parade the historic character of a strong tall building edge is created to recreate the lane character. Behind Moore Street the taller office building has a striking modern design using stone and brick, historically used in the area, in a contemporary manner to create a new landmark overlooking the new square.

Between the historic response to Moore Street and the new office building overlooking the new square, Site 5 responds to the surrounding streets, while contributing towards the creation of a new square, while providing appropriate variety in building scale and form to create visual interest in the landscape.

The Masterplan is divided into independent sites designed by several architectural practices to ensure appropriately varied design and visual appearance. The design of each Site will adhere to the common principles set down in the Masterplan to ensure overall coherence and coordinated place-making in the regeneration at this prominent and visually sensitive city centre location.

Two new connecting streets or laneways, a small pocket square and a larger public square are introduced into the existing monolithic nature of the three city blocks which compose the Dublin Central site. These interventions breakdown block scale, encourage through movement and enable a higher level of access across the site. The resultant more intimate block pattern has fewer unrelieved or unrelenting façades, avoiding "uninterrupted walls of building". The objective is create a visually stimulating city environment full of interest and building detail. We refer the Board to The Masterplan Design Statement, prepared by ACME as submitted at application stage for further details in relation to placemaking across the Dublin Central Masterplan.

The Dublin Central Masterplan, including Site 5 will add to the public realms of this city centre site, enhancing the benefit and enjoyment of the locality and offer a range of various activities. The open spaces, both public and private, create a sense of place and uses high quality material and finishes throughout, the orientation and design of the site maximises daylight and sunlight availability across the development.

Design Quality

It is an ambition of the Dublin Central Masterplan to deliver a world class City Quarter that site respectfully within its context, utilising its location and heritage features. Drive long term value provision of high quality commercial and retail space. The Dublin Central Masterplan, including Site 5,

incorporates high quality, contemporary design whilst also acknowledging the need to incorporate the quality historical elements.

The Planning Authority were generally satisfied with the building heights proposed, in their assessment the following is stated that: -

In this instance it is considered that the proposed development, in terms of height and massing would be in keeping with the existing and developing built context and does not give rise to an unacceptable or overbearing impact upon the adjoining development.

Generally, the Planning Authority are positively disposed to the proposed heights across the Masterplan given the central location, the sites proximity to transport nodes and general improvement on the built character of the area.

The overall design of Dublin Central took in to consideration the existing context and the scale and pattern of the existing streets, and it respects and enhances the areas architectural assets whilst creating a number of new landmark features.

Climate Action

The applicant has a strong track record of sensitive urban regeneration projects, including those in historic city centres, such as Bishopsgate development located in Spitalfields in London. In 2017 Hammerson became the first real estate company globally to launch a comprehensive Net Positive strategy covering both environmental and socio-economic impacts. The team has worked hard to ensure resource efficiency, climate risk and health and wellbeing considerations were embedded at the outset of the Dublin Central design process.

It should be noted that the planning application was accompanied by a comprehensive EIAR which assessed the Masterplan as well as each individual sites.

The Landscape Masterplan, prepared by Gross Max Landscape Architects for the overall Dublin Central Masterplan is guided by an overall design vision which follows the objective to create a sustainable public realm with increased biodiversity. This will be done using green roofs to increase biodiversity, to slow rainfall run-off and improve the microclimate. New tree planting to be climate adaptable and suitable for site conditions.

It is noted that a key climate mitigation action for all new development relates to the need to reduce energy demand, to increase energy efficiency and to provide renewable energy on-site if possible. We refer the Board to the Dublin Central – Site 5 Energy & Sustainability Statement, prepared by BDP M&E Consulting Engineers which accompanied the planning application. The proposal contained in the BDP Report align with the requirements set out above. It notes *“The Dublin Central Site 5 project is aspiring to be one of Ireland’s first Net Zero Carbon schemes offering workers and visitors a low carbon footprint alternative for Dublin.”*

Furthermore, the energy efficiency measures to be adapted in the proposed development will assist in achieving the target set out in the Climate Action Plan 2024 to reduce carbon emissions within the built environment.

The planning application has been designed to be Ireland’s first Net Zero Carbon schemes, the design maximises sustainable energy uses, materials, uses appropriate SuDS measures throughout and enhances biodiversity of the urban block.

Inclusivity

The Dublin Central masterplan has been designed to meet the mobility needs and convenience of all. The scheme delivers good permeability throughout allowing all-inclusive access without compromising the existing historical character. All of the buildings are Part M compliant; we refer the planning authority to Appendix I of the Architectural Design Statement prepared by ACME Architects which discusses inclusivity of the Site.

Regeneration

In the first instance we refer the Bord to section 2.8 of this response which addresses regeneration in detail.

The Dublin Central Masterplan is a significant urban regeneration project that encourages high-quality urban design and architectural details that contribute to the historic streetscape and creates new points of interest in the area.

The Applicant has appointed a world class design team, led by ACME Architects as Masterplan Architect, to help realise its vision for the redevelopment and regeneration of this key city centre site.

This conservation approach seeks to ensure that buildings of historic significance are brought into viable re-use, instilling new life and activity into what was hitherto unusable floor space notwithstanding its location overlooking one of Dublin's premier shopping streets. It seeks to strike an appropriate balance between the conservation of a representative collection of 19th and 20th century buildings and the provision of high quality retail, residential, hotel, café / restaurant and cultural floor space that will drive the regeneration and active use of this significant city centre location. The general appearance, the historic uses and associations are largely maintained, particularly along Henry Street and Moore Street.

Site 5 is consistent with the national policy objectives of the NPF in achieving sustainable mixed-use development (including café / restaurant and office uses) appropriate to the regeneration and rejuvenation of this city block at the junction of Henry Street and Moore Street, and the wider Masterplan, in the heart of Dublin City Centre.

We refer the Board to the ACME Masterplan material and MOLA Masterplan Conservation material for full details on the regeneration of the Dublin Central masterplan site as well as the ACME architectural material and MOLA Conservation material for site 5 in particular, all documents are as submitted at application stage.

Height

The planning application seeks permission for a mixed-use scheme which ranges in height from 2 — 6 (over single storey partial basement). This is within the prevailing heights of buildings in the area and does not require an evaluation of criteria set out in Appendix 3 of the City Development Plan as a result.

At a height of max. 30 m, the tallest building element in Site 5 is neither a 'Locally Higher Building' nor a 'Landmark/Tall Building', as described in Appendix 3 of the current Development Plan. As such, it can be considered a building of 'Prevailing Height'. The proposed development is not therefore significantly higher than the current prevailing height in this part of city centre of 6 to 7 storeys (noting that a hotel on the corner of Moore Lane and Parnell Street is at 9 storeys and is still under construction).

It should be noted that, as previously identified, Site 5 lies within SDRA 10 – North East Inner City (NEIC). Appendix 3 of the Development Plan – Achieving Sustainable Compact Growth of the Development Plan identifies this SDRA as being "*particularly appropriate for higher buildings and density*". The design principles for the O'Connell Street / Moore Street 'Key Opportunity Site', within the SDRA, are discussed further in Section 2.8 of this report below.

Notwithstanding the above, we refer the Bord to the Design & Access Statement, prepared by ACME Architects, in particular Section 4.0 (Height, Massing & Scale) and Appendix I (Building Height Criteria) and to the Planning Report prepared by this office where the criteria for building height is considered having regard to the Urban Development and Building Height Guidelines (2018) for a further detailed design discussion relating to building height as submitted at application stage.

The building height strategy adopted for Site 5 has been considered in the context of the wider Masterplan vision. Site 5 announces the wider regeneration scheme at a key location adjoining Moore Street.

Along Moore Street the new buildings follow the existing building line, plot lines, and building heights. Historical records show that the buildings on these plots were originally 3 and 4 storeys high, and these heights have been maintained, with the four storey element moving north to the corner of the O'Rahilly

Parade, to mitigate the change in height between the three storeys of the historic fabric and the 6 storeys of the Jury's Inn Hotel and the 9 storey's at the adjoining hotel currently under construction at the corner of Parnell Street and Moore Lane.

The building line of O'Rahilly parade has been widened to allow for a pavement, a loading bay and a disabled parking space to accommodate increased pedestrian movement anticipated from the proposed Metrolink Station as well as allowing for service vehicles to use this street. The building rises to 6 storeys to maintain the tight sense of enclosure provided by the earlier warehouse and tenement buildings. The building line is maintained on Moore Street, aligned with the rear of the National Monument and other retained and proposed buildings to the south.

The Planners Report noted the following in relation to the building height at Site 5 -

"It is considered that the greatest impact of the proposal would be from within the immediate vicinity of the site, including Moore Street and Moore Lane, where there will be a significant degree of change, based on the current situation. It is considered however that a significant degree of change does not necessarily equate to a negative impact. In this instance it is considered that the proposed development, in terms of height and massing would be in keeping with the existing and developing built context and does not give rise to an unacceptable or overbearing impact upon the adjoining development."

Plot Ratio & Site Coverage

Site 5 is considered to be consistent with the indicative plot ratio and site coverage standards for this site. The plot ratio of Site 5 (without basement) is 3.87. The site coverage of Site 5 is c. 0.76%. The lower site coverage in this instance is as a result of the Site 5 development providing part of the significant new square that provides part of the new pedestrian connection between Moore Street and O'Connell Street Upper.

The indicative plot ratio and site coverage standards are not however stand-alone requirements. Flexibility may be applied having regard to proximity to public transport and the achievement of other objectives of the Development Plan relevant to development of this nature at Site 5.

We would highlight again the regenerative, mixed use nature of the proposed development (Site 5) at this brownfield city centre site, which is proximate to high quality public transport, as circumstances that the planning authority may consider where the indicative density standards are exceeded.

Thereafter we refer the Planning Authority to the other standards of residential design and amenity that Site 5 achieves, as highlighted in this Report and the plans and particulars that accompany this application.

Design Statement

We refer the board to the Design Statement for Site 5, prepared by ACME Architecture and the ACME Masterplan Design Statement for the entire Dublin Central Site.

Model and Photomontages

We refer the board to the Photomontages enclosed in the EIAR as submitted at planning application stage for Site 5 prepared by ARC.

Green Infrastructure

We refer the board to the response on Climate Action response above. The landscape of the Dublin Central site has informed the overall landscaping plans for the area. The scheme provides good connectivity and enhances biodiversity.

Shopfront Design

We would highlight that individual shopfront signage cannot be determined until tenants are secured. Therefore, a general shopfront strategy has been devised by ACME Architects. We refer to the Masterplan Design Statement, prepared by ACME Architects for shopfront and signage design principles as submitted at application stage.

We also refer the Board to section 4.7 of the Site 5 Design Statement, prepared by ACME Architects as submitted at Planning Application Stage which provides details of shop front designs. The architectural treatment of shopfronts in this scheme has been carefully considered to closely reflect the character of adjoining shopfronts within the O'Connell Street Architectural Conservation Area; specifically around Henry Street and Moore Street.

Car and Bike Parking

No car parking is proposed as part of this development at Site 5. As noted above the site is exceptionally well located adjacent a number of modes of public transport. DCC Roads & Transportation Department as part of Pre-Planning dialogue that the provision of no parking was acceptable given the location of the site.

We refer the Board to the enclosed Transport Assessment – Vol. 3: Overall Development and Travel Plan, prepared by Waterman Moylan Consulting Engineers as submitted at application stage, in respect of existing and future public transport, pedestrian and cycling links to the site.

The Development Plan standards are applied and exceeded in respect of Site 5. The Applicant is proposing to provide 58no. bicycle parking spaces at ground floor level with associated cycling welfare facilities which provides for bicycle parking which exceeds best practice recommendations.

We refer the Board to the enclosed Traffic Assessment and Travel Plan, prepared by Waterman Moylan Consulting Engineers, as submitted at application stage, in respect bicycle parking provision.

We refer the Board to the Masterplan Design Statement, prepared by ACME at application stage which details the overall cycle and car parking provision for the entire masterplan.

A small basement car park with approximately 33 spaces is located in Site 2 accessed from the north end of Moore Lane, where the road is 24 hour use, this will be for buildings within Site 2 of the Masterplan. An additional accessible parking bay is located on O'Rahilly Parade. Several locations of short-term on-street cycle parking are proposed throughout the masterplan area. These will provide a limited number of spaces on the public square as well as in the southern part of the Masterplan area towards Henry Street. The cycle stands have been positioned to be easily accessible while reducing clutter and avoiding pedestrian desire lines. Each building provides cycle parking for the residents or workers, in discrete secure locations which will operate independently of each other and of the public cycle parking.

3 CONCLUSION

The proposed development has been carefully conceived, having regard to the statutory planning context, to the specific context and character of the site and to the potential development at the surrounding regeneration areas.

The proposal currently before the Board has been the subject of in-depth assessment by both the Applicant and Dublin City Council. It is clear from the above analysis that the scheme as presented to the board under ABP Ref. 313947-22 complies with the Dublin City Development Plan 2022-2028.

We trust that the Board will see fit to uphold the Council's decision to grant permission for the proposed development. This is appropriate on the grounds that: -

- Site 5 helps to realise the ambition for the overall Dublin Central site, referred to as the 'Key Opportunity Site 1' in SDRA 10 – North East Inner City of the City Development Plan.
- Site 5 represents an exceptional opportunity to provide a development that will act as a catalyst for the regeneration of O'Connell Street and will result in a radical, empathetic and positive impact upon the social and economic framework of the north inner city.
- Site 5 is located on a prominent site from a citywide perspective.
- Site 5 successfully integrates existing built fabric of architectural and cultural heritage interest with contemporary and innovative design.
- Site 5 complies with the zoning objectives of the site, delivering a vibrant sustainable mixed-use regeneration at a highly accessible, brownfield site in the city centre, while also making a positive architectural contribution in the context of the surrounding conservation area and neighbouring protected structures.
- The Site 5 design approach achieves optimum use of an underutilised site, which has its own inherent constraints. The proposal will contribute to the reinvigoration of this neglected part of the city centre through the creation of a dynamic, high-density mixed-use development.
- The café / restaurant use will ensure that activity is maintained during the day and into the evening / night-time. This will in turn support the local economy in terms of local spending and generation of jobs.
- The office building at upper levels can accommodate a single or multiple tenants which is appropriate in the city centre.
- Site 5 will positively address the new public plaza (primary frontage of café / restaurant units) and activate O'Rahilly Parade (access points to café / restaurant units, delivery hub and office bicycle storage).
- The site is exceptionally well served by high frequency, high capacity bus and rail services. This ensure that Site 5 is entirely suitable for the provision of both residential and hotel uses.
- Site 5, including the Masterplan, has been subject of comprehensive design and environmental assessment, Appropriate Assessment Screening and an Environmental Impact Assessment Report, to ensure that it is representative of sustainable mixed-use development that meets the needs of existing and future generations.
- Through offering a more dynamic office and food & beverage offering in the city centre, Site 5 provides an opportunity in the Dublin City Retail Core to evolve in a mixed-use sustainable manner and create a destination for people to linger, stay, live, shop, work and socialise during the day and at night time.
- A sensitive design approach, the conservation and adaption of buildings of heritage significance, provision of retail, cultural, café / restaurant and office uses, balanced with the reasonable protection of the architectural and civic character of the surrounding area, in accordance with the objectives of the current Dublin City Development Plan and the proper planning and development of the area.
- Has due regard to the sensitivities of existing neighbouring properties, in particular residential uses, in respect of potential for overshadowing and overlooking, while still weighing up the practicalities of achieving sustainable brownfield redevelopment in a dense city centre environment.

STEPHEN LITTLE & ASSOCIATES
11 January 2024

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