

Planning Statement - Bailey Gibson 2 Proposed Strategic Housing Development

July 2022



Prepared on behalf of:
CWTC Multi Family ICAV acting solely in respect of
its sub fund DBTR SCR1 Fund

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Executive Summary

The overarching objective for the proposed development is to contribute to implementing Dublin City Council's long held objective to regenerate St. Teresa's Gardens and Environs, identified as strategic development and regeneration area (SDRA) 12 in the Dublin City Development Plan (DCDP) 2016-2022.

In this regard, the proposed development is informed by and is fully compliant with the urban design guiding principles for SDRA 12 set out in the DCDP, and which deal with matters such as such street network and linkages within the area and to surrounding areas; provision of public open space and the approach to height.

SDRA 12 encompasses 12.62 hectares (approx. 30 acres). The proposed development site is 5.5 hectares (approx. 13.5 acres) and includes all of the former Bailey Gibson site, part of the former Player Wills site, both of which are owned by the Applicant, CWTC Multi Family ICAV acting solely in respect of its sub fund DTBR SCR1 Fund. The balance of the proposed development site relates to land owned by Dublin City Council (DCC) known locally as the 'Boys Brigade pitch' and part of the St. Teresa's Gardens site, together with DCC in charge public roads. A Letter of Consent is included for the DCC owned/in-charge areas.

A key element in successful placemaking is to provide a range and diversity of uses, activities and built form. To achieve this, it is proposed to activate a strategically located, vacant brownfield site, known as the Bailey Gibson site, with a residential led mixed tenure (Build to Sell and Build to Rent) development. Across the DCC owned areas which are currently either undeveloped or vacant, it is proposed to deliver public open space including inter alia a multi sports pitch, a public park and a playground, together with a new internal street network that would provide connectivity across SDRA 12, where currently none exists.

This proposed development would deliver 35% of the 1,000 homes allocated to SDRA 12 in the core strategy of the DCDP. This is significant in the context of the ongoing housing crisis and the fact that this is an inner city vacant serviced site where since the coming into effect of the DCDP in 2016, almost 6 years ago, approx. 5% of the housing allocation has been delivered.



PLATE 1 SOUTH CIRCULAR ROAD/REHOBOTH JUNCTION

345 new homes will be delivered across 5 blocks BG1-BG5, that range in height from 2 to 7 storeys and compliant with the DCDP that mandates a low-rise approach to height within SDRA 12 save up to 2 tall buildings. As these are allocated to the permitted Player Wills development, also within SDRA 12, this proposed development is low rise¹, with a maximum 7 storey height. Cognisant of the existing built environment, buildings taper down to the site's perimeters so as to knit into the existing context.



PLATE 2 BG1 & REHOBOTH AVENUE INTERFACE

The building typology is predominately apartments and the tenure is mixed encompassing Build to Sell (BtS) and Build to Rent (BtR) units. The design is for homes that vary in size and layout to accommodate all stages of the lifecycle. This approach will allow residents an opportunity to continue to live within the area and upsize or downsize, rent or buy, as their needs change.

The BtR tenure is contained within blocks BG1-BG3 with a total of 292 apartments. The balance, 53 homes, are BtS tenure and are distributed across blocks BG 4 (apartments) and BG5 4 townhouses.

¹ Inner City – Up to 24m residential (16.7.2 DCDP)

Dedicated amenities, services and facilities including a gym, coworking space, communal lounges, kitchens etc. are provided within the BtR blocks and will contribute to the creation of a shared environment where residents can become more integrated and develop a sense of belonging with their neighbours.

The proposed development responds to the shortage of childcare facilities that exists locally and a creche is proposed with capacity for approx. 60 pre-school children. It will serve the needs of the proposed development and the wider area.

Having regard to the substantial population that will be generated by this development and the need to provide essential daily living services within a community, commercial floorspace is integrated into the residential blocks. The units will facilitate a range of uses including a local neighbourhood shop, a pharmacy/dental practice/general practitioner, community/arts related events, or a bingo venue. A unit is also set aside for restaurant/café/bar. These uses will activate the streets in this new urban quarter and enhance its vibrancy.



PLATE 3 BLOCK BG2 ADDRESSING PLAYERS PARK

A key objective of the proposed development is to deliver a substantial quantity of public open space that will cater for active and passive recreation together with play for the existing residents of Dublin 8 and future occupants of the scheme.

This will be achieved by allocating approx. 2.5 hectares (over 6 acres) of the site to open space across the following key areas;

- i. A multi-purpose play pitch within St. Teresa's Gardens;
- ii. 'St. Teresa's Boulevard', to the south of the proposed pitch;
- iii. 'St. Teresa's Playground' to the north of the proposed pitch;
- iv. Players Park' in the Boys Brigade pitches; and,
- v. 'Rehoboth Plaza' at the entrance to the Bailey Gibson site.
- vi. Courtyards and Podium Gardens

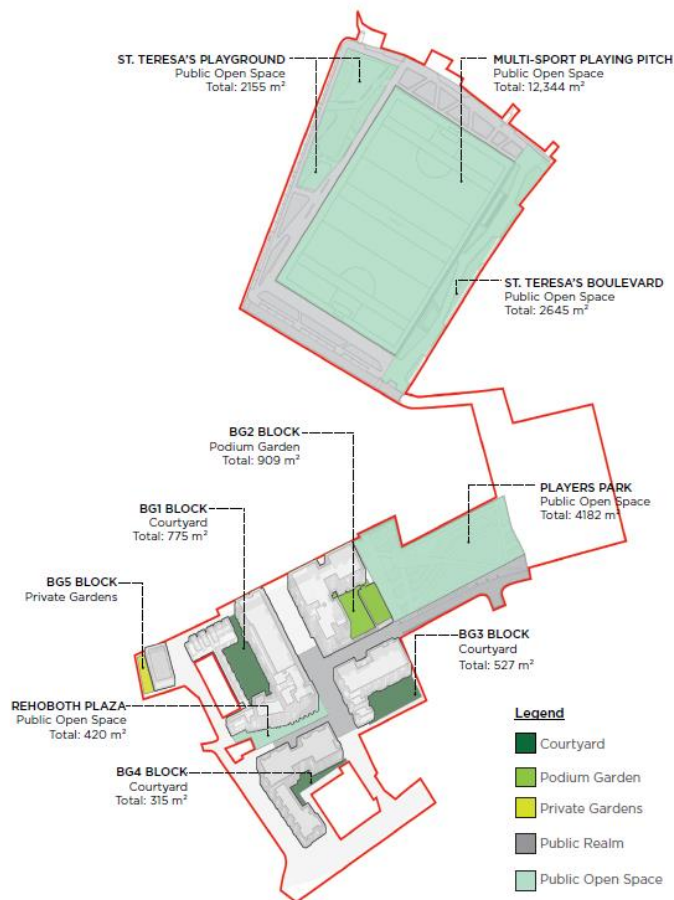


FIGURE 1 PROPOSED PUBLIC & COMMUNAL OPEN SPACE DISTRIBUTION

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

A second park, 'St. Teresa's Playground' is proposed to the north of the proposed multi sports pitch. It is designed as a predominately formal play area that will cater for all age groups.



PLATE 4 PROPOSED SPORTS PITCH & PLAYGROUND – ST. TERESA'S GARDENS

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

Biodiversity is a key objectives of the landscape design and is reflected in the planting of a variety of trees and shrub species that are predominantly native and pollinator friendly. Over 300 new trees will be planted and built-in bat and swift boxes will be incorporated within the buildings located high up underneath the eaves.



PLATE 5 PROPOSED PLAYERS PARK

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

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



PLATE 6 SAMPLE OF PROPOSED MATERIALS

Given the accessible location of the site, parking is minimised and this will contribute to encouraging residents to move toward using sustainable transport modes (walking, cycling, bus and Luas) with consequent environmental and health gains.

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

- good quality homes for a diverse range of household types and tenures incorporating high standards of sustainability;
- a range and diversity of non-residential uses that complement existing services locally and address identified shortfalls such as childcare;
- enhances the natural environment and protects the existing built environment;
- promotes health lifestyle through facilitating active travel opportunities and access to an abundance of open space for exercise, recreation and play; and,
- designs streets as public spaces rather than thoroughfares and connects the development site with the wider area.

This proposal complements and integrates with the permitted development on the wider regeneration lands including St. Teresa's Gardens and the former Player Wills site and is cognisant of future development proposals for the wider SDRA 12 lands and immediately beyond. Together, a new integrated and inclusive urban quarter will be delivered that will enhance the vitality and vibrancy of Dublin 8, through the delivery of opportunities to live, work and play.

1. Introduction

This Planning Statement has been prepared by McCutcheon Halley Planning (MHP) Consultants on behalf of the Applicant, CWTC Multi Family ICAV acting solely in respect of its sub fund DBTR SCR1 Fund. The Applicant is applying to An Bord Pleanála for permission for development on a site of 5.5 hectares for a mixed-use combined Build to Rent (BtR) and Build to Sell (BtS) Strategic Housing Development.

The consistency of the scheme with national, regional, section 28 ministerial guidelines and the Dublin City Development Plan 2016-2022 is examined in separate reports that accompany this application. Therefore, the focus of this report is to provide a detailed description of the proposed development and to set out a justification demonstrating that it is in accordance with the proper planning and sustainable development of the area.

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

The proposed development site encompasses an area of 5.5 hectares and is located in Dublin's inner city. Apart from works within public roads surrounding the site, the application area is within that area defined by Dublin City Council (DCC) as Strategic Development Regeneration Areas (SDRA) 12, St. Teresa's Gardens & Environs in the Dublin City Development Plan(DCDP) 2016-2022. Not all of the land within the proposed development site IS owned by the Applicant, some areas are owned by DCC or in their charge, in the case of public roads. Accordingly, a Letter of Consent from DCC accompanies this application.

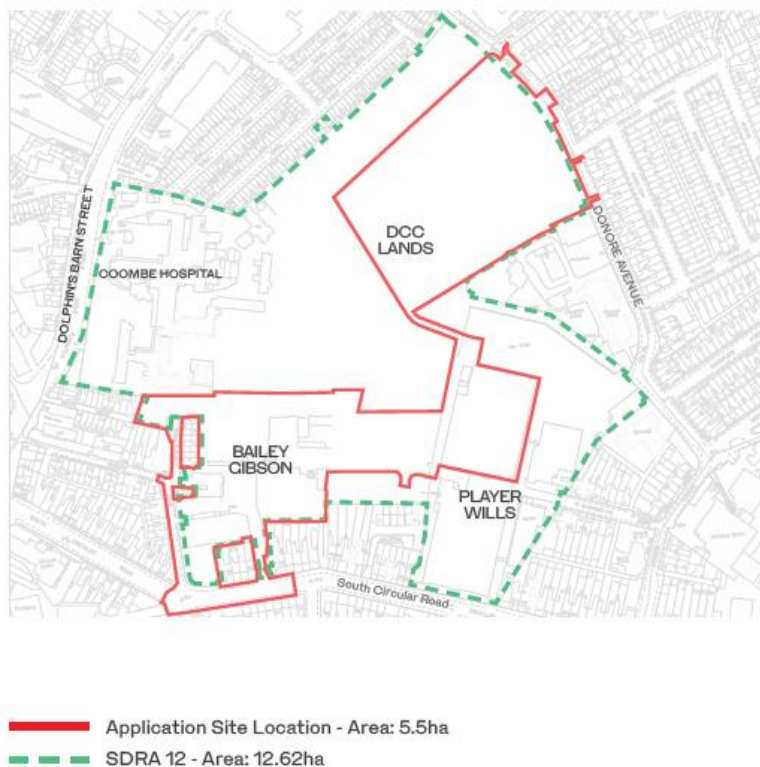


FIGURE 2 PROPOSED DEVELOPMENT SITE

1.1 Strategic Housing Development

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

This is a mixed tenure scheme with 3 proposed BtR blocks, BG1 – BG3. To qualify as a BtR scheme it is necessary to satisfy the requirements of Specific Planning Policy Requirement (SPPR) 7 of the Sustainable Urban Housing: Design Standards for New Apartments, 2020. The development will remain owned and managed by an institutional entity for at least 15 years and individual units will not be sold or rented separately for that period. The public notices associated with the application identify the proposed development as part 'Build to Rent' housing development and a draft covenant/legal agreement is included with the application. The design of the scheme includes resident support facilities, services and amenities including inter alia a concierge office, waste management facilities, a gym, co-working space and communal living areas. Full details are presented in the Urban and Architectural Design Statement and the architectural suite of drawings.

The Applicant has carried out consultation with the Planning Authority under Section 247 of the Planning and Development Act 2000, amended, see Section 4 of this report for full details. A pre-application consultation meeting was held under Section 6(5) of the Planning and Development Act 2000, as amended. A separate report entitled Response to An Bord Pleanála Pre-application Consultation Opinion is submitted under separate cover, to address the specific matters raised by ABP in their Notice of Pre-Application Consultation Opinion (case ref. ABP-311959-21).

1.2 Overview of Proposed Development

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

A full description of the proposed development is set out in Section 6 of this report.

Briefly, it is proposed to demolish the existing vacant buildings and structures on the Bailey Gibson site to make way for development of 345 new homes across 5 blocks, BG 1 - BG 5, ranging in height from 2-7 storeys. The residential blocks will be contained within the Bailey Gibson site. The typology is predominantly apartments with 4 townhouses proposed in block BG5.

This is a mixed tenure scheme, with 292 units proposed as Build to Rent (BtR) across blocks BG1-BG3 and 53 units proposed as Build to Sell (BtS) in blocks BG4 and BG5. It is proposed to deliver 34 social and affordable homes as part of the overall total.

Over 2 hectares of public open space including a multi-sport play pitch, a playground, 'St. Teresa's Playground', a boulevard, 'St. Teresa's Boulevard', a park, 'Players Park', a plaza, 'Rehoboth Plaza'.

The proposed non-residential uses include in blocks BG1 and BG2 commercial units that have the capacity to support daily living needs e.g., a shop, pharmacy and professional services. A creche with

capacity for approx. 60 children. In block BG2 the design includes floorspace for a café/restaurant/bar and bulky storage for residents use only.

Parking for the residents of blocks BG1-BG4 is predominantly at basement level and the carparking ratio is 0.26 spaces per unit, excluding spaces allocated to car sharing. The townhouses in BG5 each have 1 on curtilage space. The parking strategy responds to the changing nature of vehicles and 20% of the spaces are equipped with eclectic vehicle charging. Having regard to the inner city location and acknowledging the falling car ownership trend, there are dedicated parking spaces for a car sharing club, Go-Car or similar.

To promote active travel, 784 spaces are proposed for cycle parking including secure residents parking, visitor parking and spaces for cargo bicycles. Other works that will facilitate a modal shift is the network of streets proposed that will link with other sites within SDRA 12 and into the wider street network of Dublin 8, allowing greater east-west and north-south movement in the area.

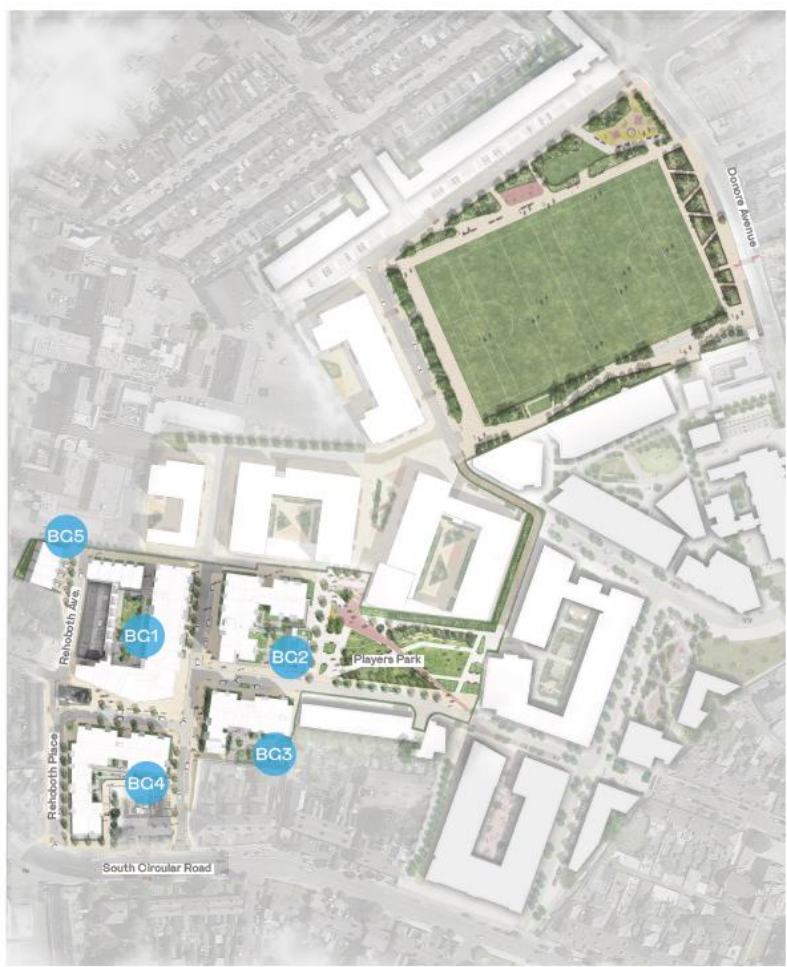


FIGURE 3 PROPOSED LAYOUT

1.3 Strategic Development Regeneration Area (SDRA) 12

The proposed development site is identified in the Dublin City Development Plan (DCDP) 2016-2022 as forming part of Strategic Development Regeneration Area (SDRA) 12, St. Teresa's Gardens and Environs.

SDRA 12 encompasses an area of 12.62 hectares including St. Teresa's Gardens, the former Player Wills and Bailey Gibson sites and the Coombe Hospital site.

An Indicative Key Development Principles plan for SDRA 12 is included in Chapter 15 of the DCDP and reproduced below. It is important to note that while the SDRA boundary in this plan excludes some of the Bailey Gibson site, this is not an accurate reflection of the full extent of SDRA 12.

Section 15.1.1.15 of the DCDP states;

"SDRA 12 St Teresa's Gardens and Environs (Inclusive of former Player Wills and Bailey Gibson sites and Coombe Hospital)."

Section 1.6 of the DCDP states;

*"Should any conflict arise between the written statement and the maps or diagrams, **the written statement shall take precedence.**" (emp. added)*

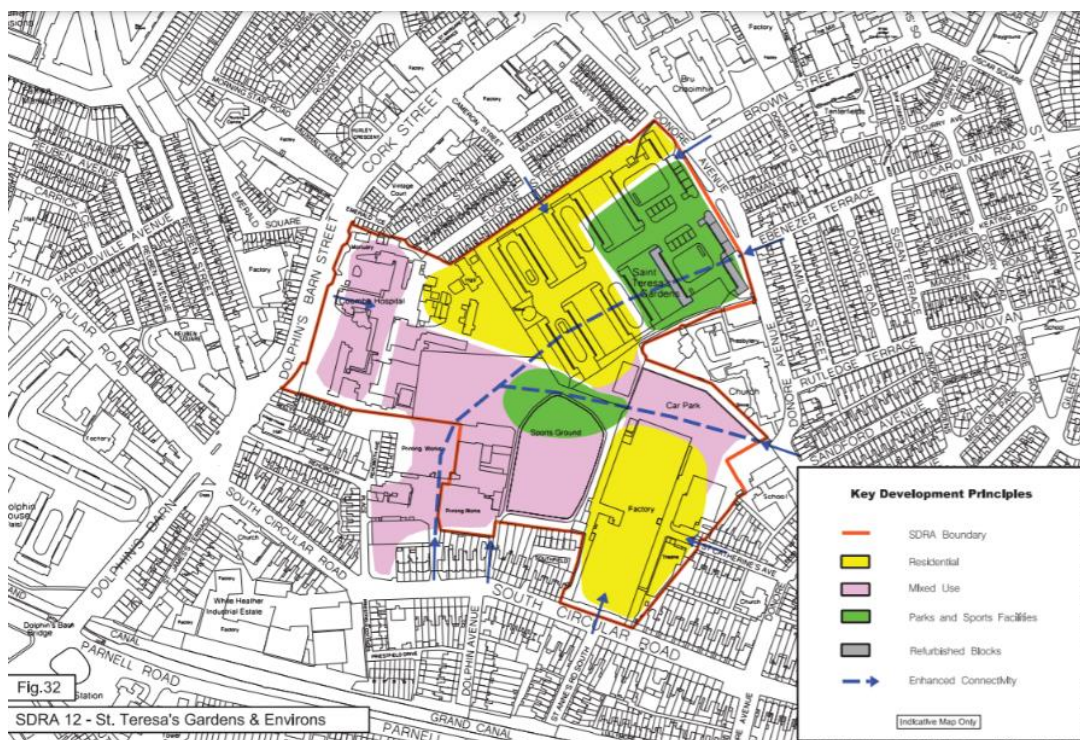


FIGURE 4 SDRA 12 KEY DEVELOPMENT PRINCIPLES (SOURCE DCDP 2016-2022)

The overall guiding principles for development of the SDRA 12 are established in the DCDP and reproduced below. Many, not all, are relevant to this proposed development site.

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

It is these guiding principles together with the DCDP's core strategy and qualitative and quantitative standards established in the development standards (see Chapter 16) and relevant section 28 Ministerial Guidelines that have shaped and informed the design development. Where specific planning policy requirements (SPPRs) conflict with development management standards, the former have been applied.

Dublin City Council's 2017 Development Framework for St. Teresa's Gardens and Environs (henceforth referenced as Development Framework) is acknowledged. Importantly, it is not relied upon in this application to justify the proposed development. This is because the Development Framework was not subject to strategic environmental assessment (SEA) and is therefore not lawfully adopted. The Board in making their determination should be cognisant of this fact.

While the proposed development relies solely on the DCDP for its justification, the Development Framework has been consulted as a source and it is noted that (a) the Development Framework aligns with the overall guiding principles for SDRA 12 as set out in section 15.1.1.15 of the DCDP and

(b) the proposed development does comply with it, notwithstanding the fact that it has not been lawfully adopted.

2. Site Description and Context

2.1 Proposed Development Site

The proposed development site comprises part of a wider regeneration area located between the South Circular Road (SCR), Rehoboth Place/Avenue and Donore Avenue, Dublin 8. It is approximately 2.3km southwest of Dublin city centre, within the canal cordons. The site is irregularly shaped and comprises 5.5 hectares.

The Bailey Gibson lands are brownfield in nature and contain vacant industrial buildings. That portion of the application area has frontage to SCR to the south and Rehoboth Place / Avenue to the west. The majority of the structures on site date from the mid/late 20th century. There is minimal early fabric surviving following many years of alterations and developments to accommodate the site's light industrial use. Block D appears to be an early 19th century structure. However, the extent of alteration and fabric loss to this structure is such that it cannot be considered to be of any particular historic significance.

The north-eastern part of the proposed development site have frontage to Donore Avenue to the east and Margaret Kennedy Road to the north. It is part of the former St. Teresa's Gardens flat complex, now largely demolished. A Part VIII extant permission includes the demolition of the remaining 2 structures, see section 4 of this report.

The former Boys Brigade pitch sits between the Bailey Gibson site and the St. Teresa's Gardens site, this is an undeveloped greenfield plot.



FIGURE 5 AERIAL VIEW OF PROPOSED DEVELOPMENT SITE

2.2 Surrounding Context

The application area is approximately 2.5kms southwest of Dublin city centre (O'Connell Street).

The existing land uses surrounding the site comprise residential, health (the Coombe Hospital), educational (St. Catherine's NS) religious (St. Teresa's Church).

Within the immediate wider area and also within SDRA 12 is the former Player Wills site. The factory building is listed on the Record of Protected Structures (RPS No: 855). There is an extant permission for development of this site, ABP Ref. 308917. It permits the demolition of all buildings excluding the original fabric of the former Player Wills Factory, the construction of 492 Build to Rent apartments, 240 Build to Rent shared accommodation units, community, arts and cultural and exhibition space, retail/café/office uses, crèche and associated site work.

South Circular Road consists almost exclusively of 2-storey dwellings and Donore Avenue, Maxwell St. and Eugene St. are predominately residential with some small neighbourhood shops.

Rehoboth Place is a narrow route, connecting the former Bailey Gibson site with Dolphin's Barn Street and is occupied by terraces of 2-storey houses.

The terraced houses along Rehoboth Place are zoned Z1, with the objective to 'protect, provide and improve residential amenities' and the neighbouring terraced houses along the South Circular Road are zoned Z2, with the objective to 'protect and/or improve the amenities of residential conservation areas'.

Dolphins Barn Street/Cork Street (R110) is 120m west of the site. This street acts as a major thoroughfare to the City Centre and is flanked with an eclectic mix of architectural styles with traditional buildings pepper potted with modern development (6-8 storeys). A period of redevelopment between 2003 and 2010 produced some notable new buildings and brought new residents to the street, with large residential schemes such as Timberyard and Southgate. The street is in a state of transition and is now undergoing a second phase of rehabilitation in tandem with the regeneration of neighbouring Newmarket. The Cork Street/ Marrowbone Lane/Donore Avenue junction and environs is a commercial and community hub for Cork Street with a range of retail outlets including a Lidl supermarket, furniture store, pharmacy, Centra convenience store with post office and a café.

Dolphins Barn is approximately 180m to the west of the site and is characterised by a mix of low-rise housing and newer apartment buildings ranging from six to eight-storeys in height. It supports an array of retail uses including a Tesco Express supermarket, SPAR convenience store, Lowes Bar and Lounge, launderette, pharmacy, funeral service, multiple hair salons, fast food outlets and specialty ethnic grocers (Afro-Caribbean, Bulgarian, Polish and Middle-Eastern).



PLATE 7 BAILEY GIBSON EXISTING STRUCTURES & LOCAL BUILT ENVIRONMENT

2.2.1 Built Heritage

Protected Structures within the vicinity of the subject site include the Player Wills Factory (RPS Ref: 855) Our Lady of Dolours Church, South Circular Road (RPS Ref: 1849), and the Church of St. Catherine and St.

James, Donore Avenue (RPS Ref: 2326). The neighbouring terraced houses along the South Circular Road are included on the National Inventory of Architectural Heritage, with a rating of 'Local' significance.

Areas along the South Circular Road and east of Donore Avenue are zoned Z2, with the objective to 'protect and/or improve the amenities of residential conservation areas'. The guiding principle is to enhance the architectural quality of the streetscape and the area, and to protect the residential character of the area.

The existing site, being vacant, largely brownfield and with a poor interface with the surrounding built environment has does not contribute to the local character. The design approach is to reverse this and to ensure a positive impact on the local character. This is achieved through public realm improvements, ensuring buildings are appropriately scaled at the boundaries of the site and applying a considered material palette that acknowledges the distinctive character of this area. In taking this approach, the proposed development would have a positive impact on the setting of the Protected Structures and Residential Conservation Areas.

Please reference the Urban and Architectural Design Statement, the Landscape Design Statement, the Materials & Finishes Report and Built Heritage chapter of the EIAR and verified Photomontages submitted with this application.

2.2.2 Public Transport Frequency & Capacity

The site is within a 5-minute walk of numerous high-frequency Dublin Bus & Go-Ahead services along Dolphin's Barn Street/Cork Street, a dedicated Quality Bus Corridor, and the South Circular Road. It is also a 9-minute walk to the Fatima Red line Luas stop.

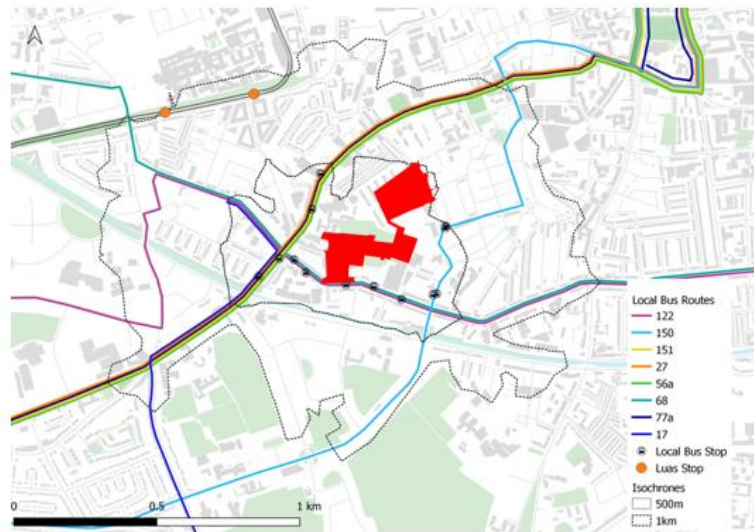


FIGURE 6 LOCAL PUBLIC TRANSPORT

The Traffic & Transport Assessment that accompanies this application includes an analysis of both frequency and capacity. It confirms that there is spare capacity on all available public transport modes sufficient to meet the demand generated by the proposed development. In summary, the capacity assessment concludes that;

- the main routes used by the local residents to access the City Centre, would be the services along Cork Street (northbound) and along South Circular Road (eastbound).
- there is enough capacity to accommodate future public transport trips generated by the development as there is currently 400 spaces free on the peak hour Cork Street services.
- the capacity along the South Circular Road, eastbound services are capable of accommodating the future public transport trips generated by the development as there is currently 600 spaces free on the peak hour Cork Street services.

Route	Route	Weekday		Weekend	
		AM Peak	Interpeak	Saturday	Sunday
68	Hawkins St./Newcastle	60	60	60	45-90
122	Ashington/Drimnagh	10	20	20	20
27	Clarehall/Jobstown	10	10	10	15
56a	Ringsend/Tallaght	60	75	75	75
77a	Ringsend/Citywest	20	20	20	30
151	Docklands/Foxborough	20	20	20	30
150	Hawkins St./Rossmore	15	20	20	30
17	Blackrock/UCD/Rialto	20	20	20	30
Luas Red Line	Tallaght/Saggart/City west-Connolly/Point	3	9	10	10

TABLE 1 FREQUENCY OF PUBLIC TRANSPORT - DUBLIN BUS & LUAS

2.2.3 Social Infrastructure Audit

The submitted Social Infrastructure Audit (SIA) demonstrates that there is a wealth of existing community, educational and social infrastructure in the surrounding area. The primary gap identified relates to childcare provision and in response to this the proposed development includes a creche with capacity to accommodate approx. 60 children. This is oversized for the demand that will be generated by the proposed development (est. 11 spaces required, see Childcare Demand Report) and will therefore contribute to the deficit that exists locally.

Regarding schools, the SIA identifies that there are 14 primary schools and 3 post primary schools locally, with a good geographical spread as illustrated on the plan below.

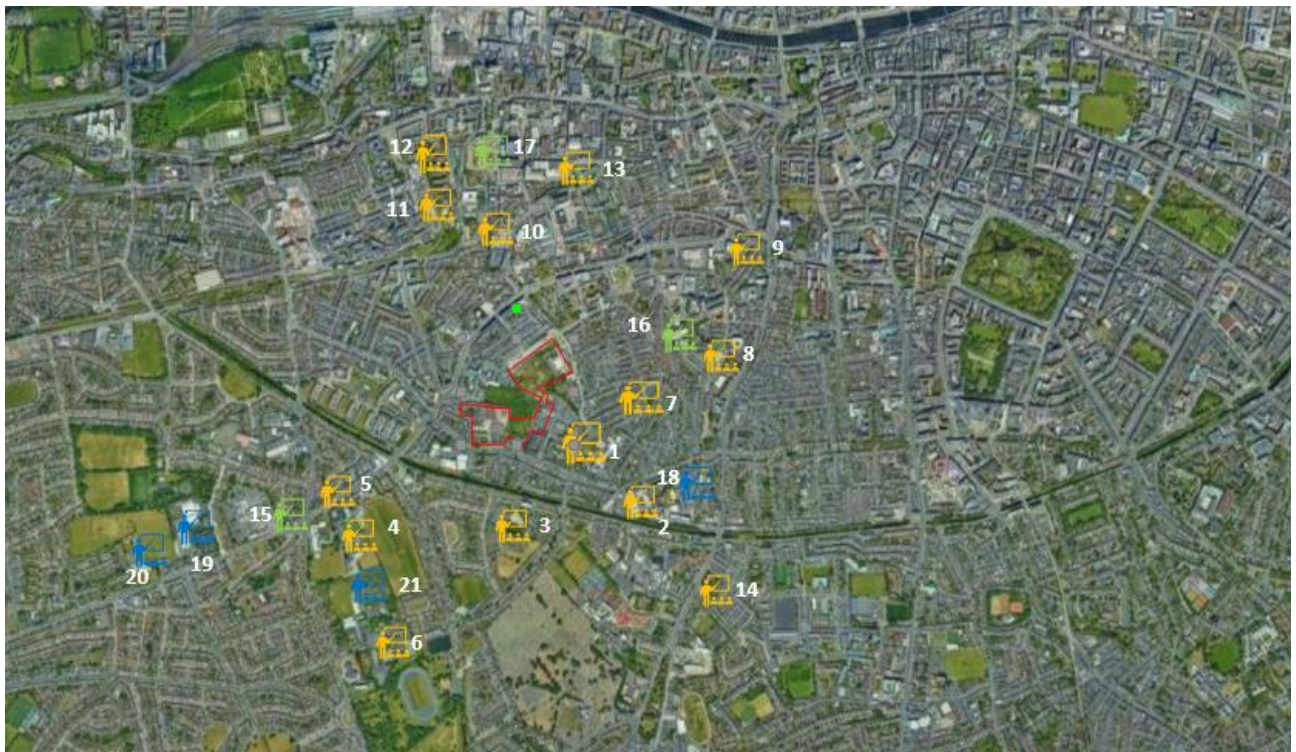


FIGURE 7 LOCATIONS OF PRIMARY AND POST PRIMARY SCHOOLS

The Department of Education is responsible for the planning and delivery of new primary and post-primary schools. The decision to establish new schools is informed by demographic analysis. Geographical Information System, using data from a range of sources, including school enrolments, child benefit records and information on residential development is used to identify where the pressure for school places across the country will arise. With this information, nationwide demographic exercises are carried out to determine where additional school place provision is needed at primary and post-primary level.

In November 2021, the Department published a report, *Projections of full-time enrolment Primary and Second Level 2021 – 2040*. It details that enrolments in primary schools across the State are projected to fall over the coming years under all scenarios, and under the most likely M1F2 scenario it will reach a low point of 440,551 by 2033. This is 120,860 or 21.5% lower than the current figure, 561,411. Enrolments are projected to rise again thereafter and are projected to stand at 474,888 by 2040, a rise of some 34,300 over the seven years 2033 to 2040, this is still below the current figure by approx. 15%.

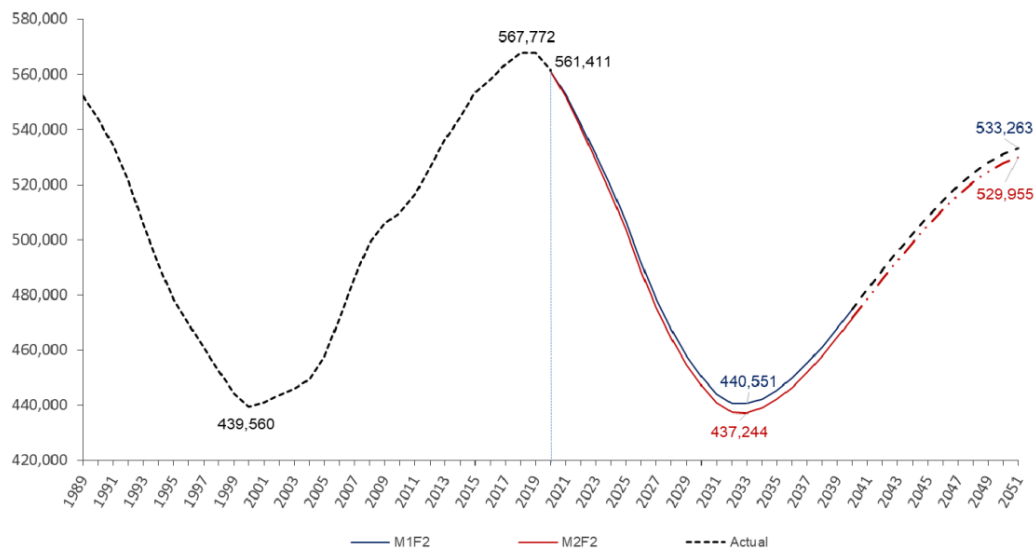


FIGURE 8 ACTUAL & PROJECTED ENROLMENTS IN PRIMARY SCHOOLS 1989-2015 (SOURCE DEPT. OF EDUCATION)

The Childcare Demand Report included with this application identifies that 5.9% of the population across the 21 EDs within a 1km radius of the site is aged 5-12. The proposed development includes 115 family units, i.e. 2 bedroom plus homes. Applying the State’s average household size of 2.75, the proposed family units would generate a population of 316 and the demand for primary school spaces would be approx.18 based on the 2016 Census information with respect to 4-12 year olds within a 1km radius.

Notably, there is a school reservation site within SDRA 12 associated with St. Catherine’s National School on Donore Avenue. The overall guiding principles in the DCDP state;

“Provision shall be made for the expansion of St Catherine’s National School, Donore Avenue, in the redevelopment of the former Player Wills site, subject to agreement with the Department of Education and Skills.”

It is within the Applicant’s landholding and as part of the permitted Player Wills it is designed as a temporary park until required by the school/Department of Education.

With respect to post-primary schools, the report identified that enrolments are projected to rise and peak in 2024 with 408,794 pupils, some 8% higher than in 2021. Following that a fall is projected, by 2,900 pupils in 2026 and by 7,700 pupils in 2029.

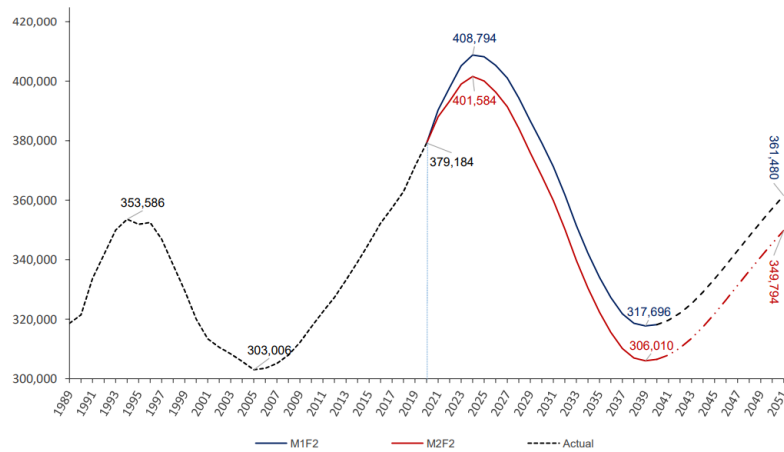


FIGURE 9 ACTUAL & PROJECTED ENROLMENTS IN POST PRIMARY SCHOOLS 1989-2015 (SOURCE DEPT. OF EDUCATION)

The SIA identifies 3 post primary schools proximate to the proposed development site. They are identified as points 15-17 on Figure 7. A review of the Departments Post Primary Schools 2021/2022 – Preliminary Results identifies that combined, these 3 schools had an enrolment of 673 pupils in 2021.

In addition to the above, we note that there is a relatively new Educate Together post primary school at Clogher Road Community College which has an enrolment of 184 pupils and given its location it would be reasonable to conclude that it would also be an option to cater for the post primary needs generated by the proposed development site.

As set out in the SIA there are 21 Electoral Divisions (5 full and 16 partially) within a 1km radius of the site. The total 2016 population was 68,945 and of this 3,197 (4.6%) were aged 12-18 i.e. post primary age. The proposed development includes 115 family units, i.e. 2 bedroom plus homes. Applying the State’s average household size of 2.75, the proposed family units would generate a population of 316 and the demand for post primary school spaces would be approx.15 based on the 2016 Census information with respect to 12-18 year olds within a 1km radius.

As outlined above, responsibility for the delivery of schools rests with the Department. Where data indicates that additional provision is required, the delivery of such additional provision is dependent on the particular circumstances of each case and may, depending on the circumstances, be provided through either one, or a combination of, the following:

- utilising existing unused capacity within a school or schools,
- extending the capacity of a school or schools,
- provision of a new school or schools.

The research undertaken to inform this section of the report did not identify any plans for new schools within the Departments School Planning Areas of Dublin 8 and Dublin 12. It can therefore be concluded that the Department has concluded that new schools are not deemed necessary at this time. This situation is of course kept under continuous review by the Department of Education.

2.3 Zoning - Dublin City Development Plan 2016-2022

There are 4 zoning designations associated with the proposed development site, Z14, Z4, Z2 and Z1. The Figure below is an extract from Map E of the DCDP and it confirms that the majority is Z14 (shaded white)

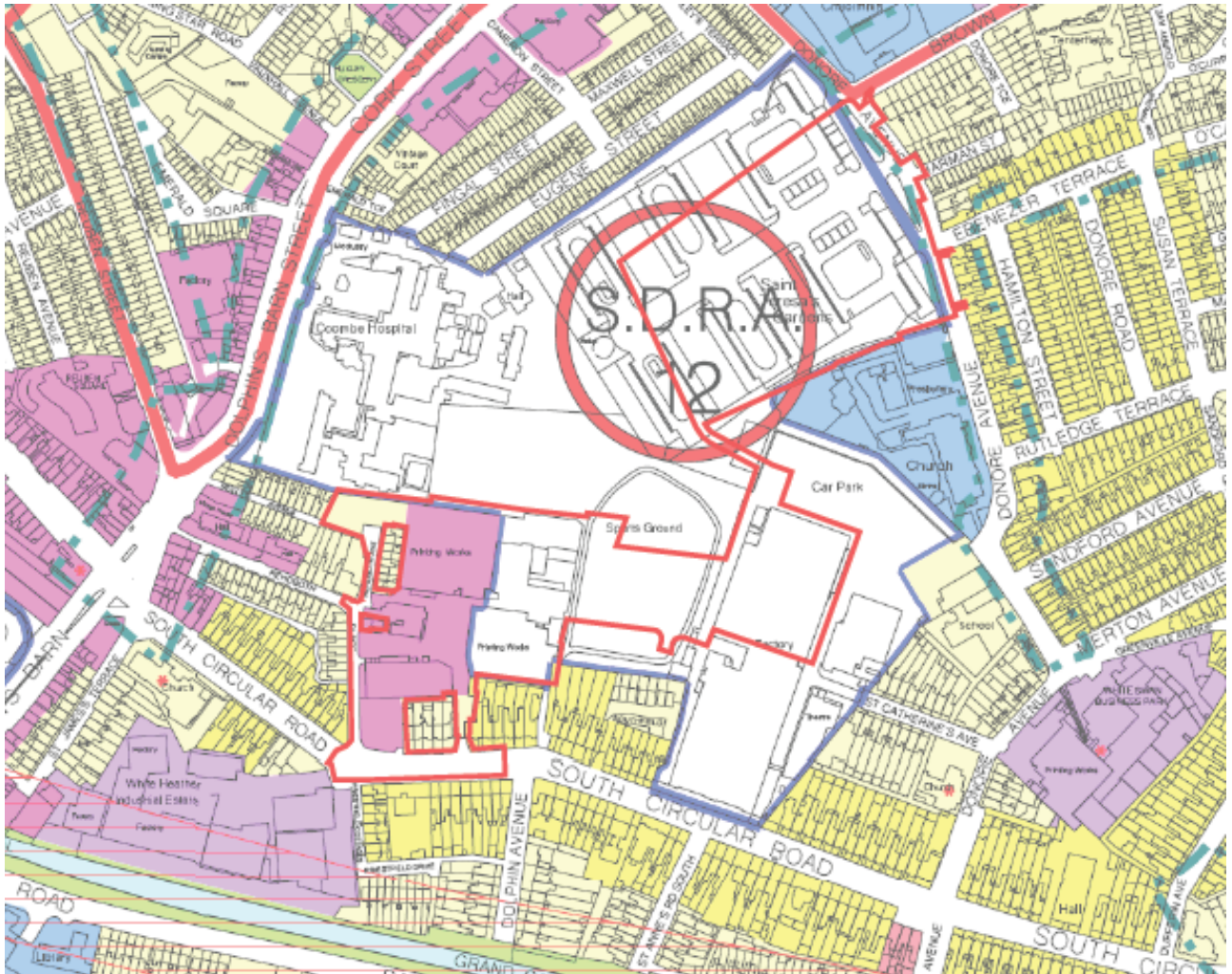


FIGURE 10 PROPOSED DEVELOPMENT SITE ZONING DESIGNATIONS

Within the Bailey Gibson site, where all 4 zoning designations exist, the proposed layout and design is cognisant of the overarching objective for each and responds in a manner that is appropriate to the stated intention.

The purple area is zoned Z4 and yellow areas Z1. There is a very small area of 42 sq.m hardly visible at this scale zoned Z2. It is inside the existing entrance to the Bailey Gibson site from South Circular Road.

The permissible and open for consideration uses for each zoning designation are set out below. It is noted that residential is a permissible use within each of the 4 zoning designations.

<p>Zoning Objective Z1</p> <p>Permissible Uses</p> <p>Buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, education, embassy residential, enterprise centre, halting site, home-based economic activity, medical and related consultants, open space, park-and-ride facility, place of public worship, public service installation, residential, shop (local), training centre.</p> <p>Open for Consideration Uses</p> <p>Bed and breakfast, betting office, car park, civic and amenity/recycling centre, garden centre, golf course and clubhouse, hostel, hotel, industry (light), live/work units, media-associated uses, petrol station, pigeon lofts, public house, restaurant, veterinary surgery.</p>	<p>Zoning Objective Z2:</p> <p>Permissible Uses</p> <p>Buildings for the health, safety and welfare of the public, childcare facility, embassy residential, home-based economic activity, medical and related consultants, open space, public service installation, residential.</p> <p>Open for Consideration Uses</p> <p>Bed and breakfast, community facility, cultural/recreational building and uses, education, live-work units, place of public worship, restaurant, veterinary surgery.</p>	<p>Zoning Objective Z4</p> <p>Permissible Uses</p> <p>Amusement/leisure complex, bed and breakfast, betting office, buildings for the health, safety and welfare of the public, car park, car trading, childcare facility, civic offices, community facility, cultural/recreational building and uses, delicatessen, education, embassy office, enterprise centre, garden centre, guest house, halting site, home-based economic activity, hostel, hotel, industry (light), live work units, media-associated uses, medical and related consultants, motor sales showroom, office (max. 600 sq m.), off-licence, open space, park and ride facility, part off-licence, petrol station, place of public worship, public house, residential, restaurant, science and technology-based industry, shop (district), shop (neighbourhood), take-away, training centre.</p> <p>Open for Consideration Uses</p> <p>Advertisement and advertising structures, civic and amenity/recycling centre, conference centre, embassy residential, factory shop, financial institution, funeral home, garage (motor repair/service), household fuel depot, internet café, nightclub, office (max. 1200 sq m) outdoor poster advertising, shop (major comparison), warehousing (retail/non-food)/retail park.</p>
<p>Zoning Objective Z14</p> <p>Permissible Uses</p> <p>Betting office, buildings for the health, safety and welfare of the public; childcare facility, community facility, conference centre, cultural/recreational building and uses, education, embassy office, embassy residential, enterprise centre, green/clean industries, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, offices, open space, park and ride facility, part off-licence, place of public worship, public service installation, residential, restaurant, science and technology-based industry, shop (neighbourhood), training centre.</p> <p>Open for Consideration Uses</p> <p>Advertisement and advertising structures, bed and breakfast, car park, car trading, civic and amenity/recycling centre, factory shop, financial institution, funeral home, garage (motor repair/service), garden centre, golf course and clubhouse, hostel, internet café, nightclub, off-licence, outdoor poster advertising, petrol station, pigeon lofts, public house, take-away, veterinary surgery, warehousing (retail/non-food)/retail park, warehousing.</p>		

PLATE 8 PERMISSIBLE & OPEN TO CONSIDERATION USES, Z1, Z2, Z4 & Z14

2.3.1 Z14, Strategic Development and Regeneration Area

Approx. 4 hectares (73% of the application area) is zoned Z14, Strategic Development and Regeneration Area, and the objective is *“to seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and ‘Z6’ would be the predominant uses. The purpose of the Z6 zoning is to provide for the creation and protection of enterprise and facilitate opportunities for employment creation.”*

SDRAs are described as areas with capacity for a substantial amount of development. Principles to guide the development of SDRA 12 are set out as per section 1.2 of this report. Having regard to the ability of Z14 lands to support significant mixed-use development; developments must include proposals for additional physical and social infrastructure/facilities to support same.

The proposed development is a residential led mixed use development that integrates a significant quantity of public open space with a multi sport playing pitch which is a long held objective for this area. The scheme includes a playground and a public park that will support passive and active uses. Other uses proposed include a creche sized to cater for the demand of the scheme and the identified deficit that exists locally.

2.3.2 Z4, District Centre

Approx. 0.8 hectares (52%) of Bailey Gibson is zoned Z4, – District Centres (incorporating Key district centres) and the objective is *‘To provide for and improve mixed-services facilities.’*

The Development Plan states in relation to Z4;

“To maintain their role as district centres, new development should enhance their attractiveness and safety for pedestrians and a diversity of uses should be promoted to maintain their vitality throughout the day and evening. In this regard, opportunity should be taken to use the levels above ground level for additional commercial/retail/ services or residential use with appropriate social facilities. Higher densities will be permitted in district centres, particularly where they are well served by public transport. The district centre can provide a focal point for the delivery of integrated services..”

Appendix 3 of the DCDP is the Retail Strategy and it includes a section for SDRAs;

“The retail strategy for the Greater Dublin Area states that it is important that where large areas of new housing are planned that new retail centres are provided in tandem with housing, at a scale appropriate to meet the regular convenience and lower order comparison shopping needs of these communities. It further states that in granting such development, cognisance should be taken of existing retail in other areas, but that retail provision in such growth areas should not be restricted on the basis of permitted retail development in existing areas and the quantum set out in the regional strategy, emphasising instead the need for overall regard to patterns of sustainable travel and community viability.”

The principle of considering existing facilities within the wider locality is also supported in the 2009 Sustainable Residential Development in Urban Areas Guidelines which the DCDP has regard to. It is the Policy of Dublin City Council:

SN4: To have regard to the Department of Housing, Planning, Community and Local Government’s Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010,

the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DCLG's Design Manual for Urban Streets and Roads (DMURS), 2013 and the NTA's Permeability Best Practice Guide, 2015, in the making of sustainable neighbourhoods. (www.environ.ie)

The western part of the Bailey Gibson site is zoned Z4, Blocks BG1 and BG4 are proposed within this part of the site and together they incorporate 200 units and a mix of other non residential uses. The range and scale of these uses is informed by a Social Infrastructure Audit of existing facilities and services locally.

Block BG1 includes, a childcare facility (347 sq.m) and 2 commercial units with a combined floor area of 317 sq.m. Rehoboth Plaza, a public gathering space is also proposed at this location. All of the uses proposed i.e. residential, childcare facility, shop and open space are all listed as permissible uses in the zoning matrix.

It is evident from Figure 5, that the District Centre zoning on the Bailey Gibson site is part of a wider mixed-service zoning approach in the immediate urban village area. To the west of Bailey Gibson, the extract from Map E of the DCDP shows the clear intent for Dolphins Barn Street & Cork Street to also act as a District Centre. Given the concentration of mixed services that exist along this corridor it is important not to undermine this in any way. It is noted that this was acknowledged by An Bord Pleanála during the processing of the SHD application for the adjacent Player Wills site and the reports attached to that planning file state;

"There are employment opportunities nearby and a raft of other community and commercial services all close at hand."

The creche and proposed commercial floorspace are strategically located at the Rehoboth entrance, the closest location to the existing mixed service centre on Dolphins Barn Street.

Positioned on the neighbourhood intersection, the commercial units have a significant presence both from within and outside the development lands. This will support additional footfall at this location thereby contributing toward the vitality as well as providing daily living services for residents of the Bailey Gibson site and wider community.

The crèche is proposed at the Rehoboth Plaza entrance. There is provision for drop off adjacent to the public plaza gathering space. Additionally, from this entry location, the crèche connects the development back to the local community.

The creche would create daytime footfall while the future uses of the two commercial units is flexible and may be occupied by Class 1 (shop), Class 2 (financial/professional services), Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall) satisfying the requirement for a diversity of uses as envisaged by the zoning designation.



FIGURE 11 PROPOSED LOCATION OF CRECHE & COMMERCIAL FLOORSPACE IN BLOCK BG1

The intent for Z14 and Z4 lands are closely aligned i.e. to facilitate mixed use neighbourhoods. In this context, the extant permission on the Player Wills site is relevant. It includes approx. 3,400 sq.m of non-residential uses, including provision for shops, a café, co-working space, a creche and a community hub.

2.3.3 Z1, Sustainable Residential Neighbourhood

Approx. 0.2 hectares in the north west and toward the south of the Bailey Gibson site is zoned 'Z1' - Sustainable Residential Neighbourhoods, with an objective "to protect, provide and improve residential amenities." Block BG5 and part of Block BG 1 is located in the north western corner and within this zoning, both blocks would deliver new homes. Both are designed as perimeter blocks within this zoned and their height is 2-3 storeys cognisant of the existing 2-storey built environment. The scale proposed knits into the existing neighbourhood context and the **Daylight & Sunlight Availability Assessment** demonstrates that the proposed development would have a negligible impact on almost all surrounding buildings.

In terms of improvement, the existing and proposed views below illustrate the extent of improvements that will occur at Rehoboth Avenue with the scheme in place. The existing structure within the Bailey Gibson site will be replaced with a block that tapers down to the height of the adjacent dwellings. Permeability and connectivity eastward is achieved and the surface of the street is improved.



PLATE 9 REHOBOTH AVENUE

2.3.4 Z2, Sustainable Residential Neighbourhood

A very small area, 42 sq.m within the Bailey Gibson site is zoned Z2, Residential Neighbourhoods (Conservation Areas) and its objective is *“To protect and/or improve the amenities of residential conservation areas.”* It relates to an area at the south western corner of Block BG3. The only development proposed within this area is footpaths as part of the public realm. As set out in the Materials and Finishes Report submitted under separate cover, the public realm paving is granite consistent with the requirements of the Construction Standards for Road and Street Works in Dublin City Council - May 2016. Having regard to the degraded nature of the surface treatment at this location, the installation of granite paving and wider public realm works associated with this access road would provide for an improved environment over the current baseline.

2.3.5 Zoning Conclusion

The proposed development will contribute to the achievement of the overarching objectives seeking rejuvenation and regeneration of the SDRA 12 lands, in particular, to:

- Deliver a mixed-use quarter with significant capacity for high quality residential accommodation and complementary uses;
- Promote a mix of tenure and unit types;
- Provide a development that is responsive to its local context and surrounding residential uses;
- Clearly define the public realm through the use and appropriate layout of buildings;
- Promote active street frontages and prioritise pedestrian activity;
- Establish a network of streets and public spaces to ensure the social and economic integration of St. Teresa’s Gardens with Player Wills and Bailey Gibson sites and surrounding area; and
- Create strong permeability through these lands between Dolphin’s Barn and Cork Street and connecting Cork Street and Donore Avenue with South Circular Road and the Grand Canal Corridor, particularly for pedestrians and cyclists.

The proposed development will meet these objectives by creating a vibrant and sustainable new urban neighbourhood. This scheme ensures a more efficient use of these lands and will significantly contribute to the revitalisation and rejuvenation of the area, fulfilling the purpose of the SDRA 12 and various zoning development objectives.

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

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

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

3 Need for the Proposed Development

3.1 Land Use

The National Planning Framework (NPF) states “between 2018 – 2040 an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet people’s needs for well located and affordable housing, with increasing demand to cater for one- and two-person households. The 25,000 target was based on research published by the ESRI in 2014.

According to the CSOs New Dwelling Completions since the publication of the NPF, the output has consistently fallen below this minimum target;

- 2018: 17,952 completions – 28% below the target
- 2019: 21,087 completions – 16% below the target
- 2020: 20,526 completions - 18% below the target
- 2021: 20,433 completions - 18% below the target

In 2020, the ESRI published a report² highlighting that 28,000 new houses would be necessary every year over the medium term just to keep up with the demand generated by population growth. These estimates incorporate expected housing obsolescence. In a high international migration scenario, that figure would be closer to 33,000 new houses a year.

Regrettably, we are now in the midst of Europe’s biggest refugee crisis since the second world war. The most recent CSO figures show that 33,000 refugees have arrived in Ireland from Ukraine to the end of May 2022. The Minister for Housing recently stated on national media that an additional 35,000 new homes could be required to house refugees over the next 5 years.

The above sets out the macro housing need context and we now turn to the micro – city and site level need.

A report prepared in 2019 by Future Analytics titled ‘Demographic Drivers and Changing Housing Demands in Dublin Over the Coming Decade’ highlights that a there will be a minimum cumulative housing requirement for 65,201 units to be completed in Dublin (4 local authorities) to 2025 to meet population growth and changing household preference (13,040 units a year, on average).

A review of the CSOs new dwelling completions by Local Authority identifies that across the 4 local authorities, 6,122 homes were delivered in 2020 and 6,226 in 2021. For each year this is less than half the minimum annual requirement.

The Core Strategy of the Dublin City Development Plan is for 29,500 units for the 6-year plan period, 2016-2022. According to CSO New Dwelling Completions figures for Q4 2016 – Q1 2022, the numbers of new dwellings completed in Dublin city since the adoption of the last development plan (from Q4 2016 until Q1 2022) was 10,721 units. This is 64% below the Core Strategy’s identified housing need and with approx. 6 months left before this development plan expires, it is unlikely that there will be any significant gains that would materially reverse this this result.

² <https://www.esri.ie/system/files/publications/RS111.pdf>

Turning to the proposed development site, the Core Strategy specifically directs the majority of the housing need identified for the period 2016-2022 to 18 areas designated as Strategic Development Regeneration Areas (SDRAs). These locations are described in the plan as having capacity to absorb a greater intensification of development. The DCDP states at section 2.3.12 under the heading 'Guiding Principles for Strategic Development and Regeneration Areas',

"these represent significant areas of the inner and outer city with substantial development capacity and the potential to deliver the residential, employment and recreational needs of the city."

Combined the estimated housing capacity of the 18 sites is 29,300 units (see Table E of DCDP). This accounts for almost all of the housing need (29,500 units) identified for the plan period. Therefore, activating the SDRAs is critical for the implementation phase of the Core Strategy.

The proposed development site is part of SDRA 12, St. Teresa's Gardens & Environs. It has an allocated capacity of approx. 1,000 units in the DCDP. To date, and almost at the end of the plan's life term, 54 new homes or approx. 5% of the overall target has been delivered. This proposal for 345 units would achieve approx. 34.5% of the SDRA 12 allocation. Therefore, at a site level, the proposed development is strategically important to implementing the housing need identified in the DCDPs Core Strategy.

It is clear from this that housing supply must increase to meet even the most conservative housing need scenario and in this context an application for permission for 345 new homes is both appropriate and necessary.

Mixed use areas that encompass a variety of purposes (e.g. homes, employment, shops, leisure, education and health facilities) is a key element for a successful compact community. The key word is local: a balanced range of facilities and work within easy reach of where people live. Established urban areas such as Dublin 8 already enjoy a successful mix of uses enabling easy access to local amenities and services, this is confirmed in the Social Infrastructure Audit (SIA).

Mixed use is the characteristic which provides for most of the benefits that a successful compact development brings: reduced traffic and travel needs, local variety and vitality, and increased local surveillance which reduces anti-social behaviour and crime.

The Sustainable Residential Development in Urban Areas (SRDUA) Guidelines (2009), includes a chapter, 'Planning for Sustainable Neighbourhoods'. It is focussed on planning at the neighbourhood scale within brownfield or greenfield sites in larger towns and cities. The guidelines have direct relevance for this subject development site. 4 planning objectives/themes for successfully developing new neighbourhoods within the existing built environment are set out;

- i. Provision of community facilities;
- ii. Efficient use of resources;
- iii. Amenity/quality of life issues; and,
- iv. Conservation of the built and natural environment.

Sensibly it is recommended that the uses proposed should be cognisant of the existing provision of amenities and services locally and with respect to retail should not undermine existing vitality. This is the approach taken in this proposed development. To inform the 'other uses' in this proposed development, a SIA was undertaken and it identified existing assets within 1km, approx. 15-minute walk time of the site. The primary gap noted in the audit was childcare. Accordingly this proposed development includes

a creche with capacity for 60 childcare spaces. The Childcare Demand Report confirms that it will serve the needs of the scheme and make a significant contribution to the wider needs in the local area.

Having regard to the nature of the proposed development i.e. predominately residential, and the outcome of the SIA, commercial floorspace to service the daily living needs of new residents together with those already residing locally was deemed appropriate. Accordingly, the scheme includes 2 commercial units that would facilitate a range of uses including a shop, pharmacy, GP/dental practice, community use etc. The scope of uses described in the statutory notices is kept intentionally broad to allow for the greatest flexibility and to safeguard against vacancy. The uses proposed are Class 1 (shop), Class 2 (financial/professional services), Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall). Coupled with these units, the design includes a café/restaurant/bar in block BG2.

Three of the five proposed blocks are Build to Rent tenure and it is necessary to provide resident support facilities, services and amenities to meet the requirement of SPPR 7 (b) (i) and (ii) of the DSfNA (2020). To foster a sense of community and belonging, the scheme includes communal amenities including lounges, kitchens and co-working space.

Together with the existing social and community infrastructure, the uses as proposed would consolidate this emerging urban village that stretches along Cork Street and into the Newmarket Square area. Existing and future residents will be able to access most of their daily living requirements within easy reach, i.e. walking distance, of their homes. This concept, which focuses on reducing the need to travel by private car, is central to the principle of sustainable development.

The Liberties Greening Strategy does not encompass the proposed development site. However, it is informative and instructive for this proposed development as the area that it deals with is very close to the proposed development site. The strategy presents a stark assessment;

"The area is severely under-provided with high quality urban green space and this is compounded by the fact that most households live in apartments and small row houses with little or no private green space...."

The Liberties area is extremely deficient in quality green space. Whilst St. Patrick's Park is proximal to the eastern end of The Liberties, the only quality green spaces in the area are Park Terrace, Oscar Square, St. Audeon's and St. Catherine's Park. Whilst these green spaces are attractive; they are all small and support only a limited range of passive recreational activity; with no play areas, sports facilities or space for growing food. Accessible quality public green space is provided at a rate of 0.7sqm per person, which is in stark contrast to an average of 49 sqm/person for Dublin City Council as a whole or 15sqm per person for the south east quadrant of the Canal Ring...

There are approximately 1200 trees in The Liberties area equating to a canopy coverage of less than 5% of the plan area."

The DCDP requires 20% of SDRA 12 to be reserved as public open space (POS). SDRA 12 encompasses an area of 12.62 hectares, accordingly, it is necessary to set aside 2.5ha as POS. The overall guiding principles and indicative plan for SDRA 12 indicates that this will predominantly take the form of a new public park and sport pitch. The proposed development site is 5.5ha including 0.45ha that is not within SDRA 12. This area relates to surrounding public roads where works are proposed to facilitate access and connections to municipal services. Therefore, the SDRA 12 POS requirement applies to 5.05ha and accordingly 1.01ha is required to meet the Dublin City Development Plan requirement.

The intention of this proposed development is to meet quantitative standards, but the qualitative aspect is deemed equally important as it is a key element in defining the quality of the residential environment. This view is confirmed in the SRDUA Guidelines;

“Apart from the direct provision of active and passive recreation, it adds to the sense of identity of a neighbourhood, helps create a community spirit, and can improve the image of an area (especially a regeneration area). Well-designed open space is even more important in higher density residential developments.”

Almost all of the required 20% is provided as part of this proposed development. 2.2 hectares (approx. 5.5 acres) is reserved as POS, this is more than 40% of the application area. A variety of spaces, providing for active, passive and play are included and over 300 new trees will be planted across the site.

1. A multi-purpose play pitch within DCC lands to the northeast of the application area;
2. A public boulevard, ‘St. Teresa’s Boulevard’, to the south of the proposed pitch;
3. A public park, ‘St. Teresa’s Playground’ incorporating a playground and amenity space to the north of the proposed pitch;
4. A public park (‘Players Park’) to the east of the Bailey Gibson site; and,
5. A public plaza (‘Rehoboth Plaza’) at the entrance to the Bailey Gibson site.

3.2 Dwelling Mix

The National Planning Framework states that seven out of ten households in the State consist of three people or less and this figure is expected to decline to approximately 2.5 persons per household by 2040. A similar assertion is made in the 2020 Design Standards for New Apartments (DsFNA);

“Analysis of urban housing need points to the fact that into the future, a majority of households will comprise 1-2 persons and approximately half of the remainder will be three person households.”

There has been a significant shift in household occupancy and composition within existing and new households. A key influence on this shift is lower fertility rates which dropped significantly over the past 50 years and it is now below the rate of two children per woman. This reduction in fertility has decreased the average size of families and as a consequence, the demand for larger unit sizes. The average household size in Dublin was 2.73 persons per household in 2016. When isolating just those persons living in apartment units, the average household size is significantly lower, at 2.2 persons per household in 2016.

In 2016, there were 40,271 persons living alone in Dublin over the age of 65, accounting for over 1-in-4 (26.8%) of all persons over 65. This rate increases to 46.8% for persons over 80 years old. Taken as a whole, these trends mean that there is a need to plan for more homes, particularly to meet the accommodation needs of smaller families and single person households, both of which are likely to increase in number.

Dublin City is home to the largest cohort of 1 and 2 person households. In 2016, the combined 1 and 2 person households accounted for 60.3% of all households.

The 2020 DSfNA at para 2.18 states;

"In the context of sustainably increasing housing supply, targeting a greater proportion of urban housing development and matching to the type of housing required, there is a need for greater flexibility, removing restrictions that result in different approaches to apartment mix on the one hand, and to other forms of residential accommodation on the other. This is particularly relevant where comprehensive housing need and demand assessment (HNDA) has not been undertaken."

To achieve this there are Specific Planning Policy Requirements (SPPR) for unit mix. SPPR 1 states;

"Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)."

For developments that qualify as BtR under SPPR7, no restriction on dwelling mix as per SPPR8 (i);

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

Notwithstanding these SPPRs, cognisant that the proposed development would materially contravene the DCDPs unit mix, a study was undertaken to examine the appropriateness of the mix and a valid Unit Mix Justification Report is included under separate cover.

The assessment examines the demographic and existing profile of housing and households within a defined study area of 1km as illustrated below. The objective was to confirm that the proposed development would contribute positively to the choice of homes available locally.

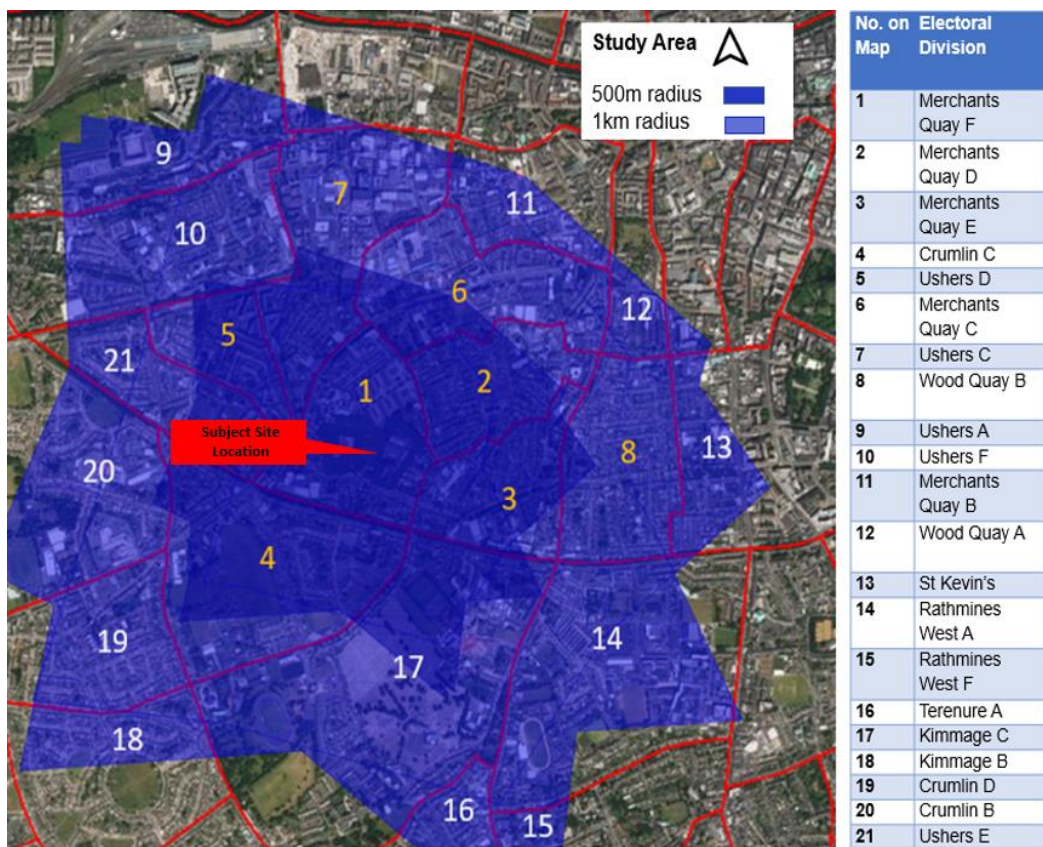


FIGURE 12 HOUSING NEED STUDY AREA (EDS WITHIN 1KM)

The primary source of information was Census 2016. Data for each of the 21 EDs was reviewed and compared with National and County (Dublin City) averages across a number of data sets. The review focussed on ;

- Population trends
- Population by age cohort
- Households and families
- Existing housing stock
- Existing worker population and commuter flows

Some key conclusions from this study are presented below.

The 2016 census data shows that contrary to prevailing trends in the study area, Dublin City and nationally, the Merchants Quay F ED (the proposed development site) has actually experienced population decline, likely attributable to deficiencies in the availability of suitable housing stock to meet demand.

A substantial proportion (64.5%) of the population are within the adult age cohort (25-64 years), significantly more than the national figure which is 53%. Thus, a substantial proportion of the local population are of working age and likely wish to live close to where they work.

Consistent with increasing trends toward smaller household sizes generally, 69% of households within the Merchants Quay F ED are comprised of 1-2 person households, this is greater than the study area (66%), Dublin City (60%) and Ireland (52%).

The available data regarding families with adult children showed that both within the application area and the study area, there is a prevalence of adult children residing in the family home. This information is sourced from a review of families where the youngest child is 20 years of age or more, being 14% in the application area and 26% in the 1km study area. The statistics regarding families by 'family cycle' also show the extent to which this has become a phenomenon with 11.8% of families in the Merchants Quay F ED made up of families where the oldest child is an adult (20 years or over) and this figure is even greater in the wider area comprising Dublin South Central, being 28%.

Decreases in vacancy rates within the application area of Merchants Quay F ED, the 1km study area and Dublin City were identified, reflecting the increased demand for available accommodation to meet housing need. This increase in housing demand is further reflected in the new dwelling completion numbers which shows that more dwellings were constructed in the Dublin 8 area compared with the surrounding Eircode districts since 2016.

Despite the increased take up of vacant housing stock, the data shows that the largest proportion of housing stock in the Merchants Quay F ED (application area) was built prior to 1919 (36.5%), compared with 21.5% in the study area. Of the existing housing stock in the application area, 53% were identified as houses / bungalows, on par with the study area (54%), despite the significant proportion of households comprising 1-2 persons, 69% and 66% respectively.

This study highlights the importance of providing additional units at this location to counter the persistent decrease in population since 2006, to cater to the significant number of 1-2 person households and the local working population. The delivery of suitable rental accommodation that caters to smaller households will also provide additional options for young working adults who are increasingly continuing to reside in the family home.

4 Planning History

4.1 Proposed Development Site

Online³ records identify 4 no. planning applications relating to the application site.

- i. There is an extant SHD permission attached to the Bailey Gibson site - An Bord Pleanála, Ref. 307221.
Permission with conditions was granted in September 2020 to Bailey Gibson SHD - An Bord Pleanála Ref: 307221-20. Former Bailey Gibson Site, 326-328 South Circular Road, Dublin 8. (<https://bgscr1shd.ie>). Demolition of all structures, construction of 416 no. residential units (4 no. houses, 412 no. apartments) and associated site works. The decision was subject to Judicial Review and it has been referred to the Court of Justice of the European Union (CJEU) by the High Court and the outcome of that process is not known. In the event that the decision is upheld by the CJEU, that permission could be implemented. The proposed development is an alternative development, furthermore only one or the other permission will be implemented.
- ii. There is an extant SHD permission attached to the Player Wills site - An Bord Pleanála, Ref. 308917. The permission includes 'Players Park', which also forms part of this proposed development.
- iii. There is an extant Part 8 permission (Ref. 2475/18) that permits inter alia the demolition of the remaining apartment blocks within the St. Teresa's flat complex..
- iv. Permission was granted by ABP on appeal in 2008 for a mixed use residential and commercial development (Refs ABP-PL29S.221717 and DCC Reg. Ref. 4423/06). The permission was not implemented, and it has now lapsed.

³ Dublin City Council & An Bord Pleanála websites

Application Reference	Development Description	Decision
307221	<p>Strategic Housing Development</p> <p>Bailey Gibson: Demolition of existing structures and construction of 416 residential units in five blocks ranging in height from 2 storeys to 16 storeys together with tenant amenities, a creche and commercial floorspace to facilitate a restaurant/café/bar at ground level in Block BG2 and commercial floorspace at ground floor level in Block BG1 to facilitate a range of uses including Class 1 (shop), Class 2 (financial/professional services), Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall).</p>	<p>ABP Grant Permission</p> <p>14th September 2020</p>
308917	<p>Strategic Housing Development</p> <p>Player Wills: Demolition of all buildings excluding the original fabric of the former Player Wills Factory, construction of 492 no. Build to Rent apartments, 240 no. Build to Rent shared accommodation along, creche and associated site works.</p>	<p>ABP Grant Permission</p> <p>15th April 2021</p>
4423/06	<p>Section 34 Application</p> <p>Mixed use residential and commercial development comprising 270 No. residential units, 9. No own door offices, 5 No. commercial/retail units, a medical centre and a leisure centre including a swimming pool.</p>	<p>DCC Granted Permission</p> <p>9 January 2007</p> <p>ABP Grant Permission (Ref. PL29S. 221717)</p> <p>11 April 2008</p>
2756/13	<p>Part 8 Approval</p> <p>The phased demolition of 10 no. four storey flat blocks comprising 276 no. residential units (apartment numbers 72-323 inclusive, 335-358 inclusive) and 5 no. commercial units nos. 52, 54, 56, 58 and 60. Ancillary works post demolition include the grubbing up and capping off of services and utilities, clearance of site and soft landscaping, boundary treatments and public lighting. The refurbishment of 60 no. apartment units (apartment unit numbers 7-38 inclusive and numbers 44-71 inclusive) located in 2 no. four storey blocks (including the amalgamation of 23 no. units to provide 15 no. larger size units) resulting in 52 no. refurbished and upgraded apartment units. Landscaping improvements to the grounds and curtilage of the 2 no. blocks to be refurbished to include hard and soft landscaping, parking provision, boundary treatment and gates, private gardens, CCTV security and public lighting.</p>	<p>Dublin City Council Approved</p> <p>2nd of September 2013</p>

2033/14	<p>Part 8 Approval</p> <p>Proposal: works at St. Teresa's Gardens, Donore Avenue (area of subject lands c. 2.3 hectares) -to facilitate the proposed regeneration of the lands and the upgrading of the existing housing stock. The works proposed under this VIII procedure comprise: The demolition of 3 no. single storey terraced houses on Eugene Street (no's 23, 24 and 25); the closure of the eastern section of Darley's terrace including the relocation of the existing ESB substation. *Note Dublin City Council proposes initiating an extinguishment of a public right of way / road closure process over this section of Darley's Terrace in 2014 to facilitate the new development. The construction of 50 no. new residential units, including balconies/terraces, comprised of 16 no. apartments ranging between 3-5 storeys in height and 34 no. terraced houses ranging between 2-3 storeys in height. revisions to the construction and refurbishment work to 2 no. existing four storey apartment blocks (previously approved under Part VIII Ref 2756/13) to now refurbish 60 no. existing units (including amalgamation of 11 no. units to provide 8 no. larger units) providing 57 no. refurbished units. The provision of a new urban park providing passive and active recreational uses and children's play facilities. Other works include the provision of a new road network comprising an entrance/ road from Donore Avenue and a route/ entrance from Eugene Street to the application site; and ancillary and associated enabling/site works including hard and soft landscaping, on-street car parking, boundary treatments, gates, bin stores, private gardens/courtyards, CCTV security and public lighting.</p>	Dublin City Council Approved 12th May 2014
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2475/18	<p>Part 8 Approval</p> <p>Proposal: amend the previously permitted development comprising 50 no. units (16 no. apartments, 24 no. 3 bedroom terraced houses and 10 no. 2 bedroom terraced units - Planning ref 2033/14) to allow for the construction of an additional 4 no. terraced residential units and associated works; amendments to the design of 12 no. previously permitted units; development of a temporary grass multisport pitch in addition to the previously permitted park development (Phase A); demolition of 2 no. existing flat blocks to facilitate the future provision of a landmark park (Phase B) with full size multisport pitch and associated works at St. Teresa's Gardens, Donore Avenue, Dublin 8 as follows: Additional residential units: 4 no. 3 bedroom terraced units - as an extension of the previously permitted 3 storey terrace. Total proposed residential development of 54 no. units (including the additional 4 no. units) comprising 16 no. apartments, 28 no. 3 bedroom terraced units and 10 no. 2 bedroom terraced units. Amendments to 12 no. previously permitted residential units: 6 no. 2 bedroom 3 storey terrace units (type E1 and F1) to be amended to 6 no. 2 bedroom 3 storey terraced units (B1 to B6). 4 no. 2 bedroom 2 storey terrace units (type D1) to be amended to 4 no. 2 bedroom two storey terraced units (D1 to D4). 2 no. 3 bedroom 3 storey units (type A) to be amended to 2 no. 3 bedroom 3 storey units (C1 and C2). Demolition of 2 no. four storey flat blocks comprising: 56 no. residential units (35 no. 1 bedroom units, 14 no. 2 bedroom units, 7 no. 3 bedroom units), a football club premises, boxing club premises/changing facility and a shop premises to facilitate the future development (Phase B) of an enlarged park and multisport playing pitch in accordance with the 2017 Development Framework for the SDRA 12 lands. Development of a temporary grass multisport pitch and associated works (in addition to the previously approved park - Phase A).</p>	Dublin City Council Approved 11th June 2018
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TABLE 2 PROPOSED DEVELOPMENT SITE'S PLANNING HISTORY

4.2 Permissions in the Wider Area

Applications of note in the immediate wider area have been identified and are presented in the Table below. The geographical distribution of these development sites in the South Central Area⁴, reflects the rapidly changing nature of this highly accessible area. They demonstrate the intensification and densification that has followed the introduction of the NPF, Eastern and Midlands RSES, section 28 Guidelines and post the adoption of the 2016 Dublin City Development Plan.

Permissions in the Cork Street and Dolphins Barn area confirm that the local area is in a state of transition, as opportunities for redevelopment are presented and future proposals align with evolving national and local policy objectives.

Of significant note, is permission for the redevelopment of the Player Wills site, also within SDRA 12 and under the control of the Applicant for this proposal. The Board determined that subject to compliance with conditions of the permission, the development would constitute an acceptable quantum and density (226 units per hectare nett) of development in an accessible location, and would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian safety. Accordingly, it was determined that the development would be in accordance with the proper planning and sustainable development of the area. Notably, this permission includes tall buildings and accordingly the allocation in the DCDP for up to 2 no. midrise buildings within SDRA 12 is deemed to be satisfied by the Player Wills permission. Therefore, the building height strategy for this proposal is limited to low-rise buildings, up to 24m for residential in the inner city.

The cases presented in the Table below demonstrates that student accommodation makes up a significant proportion of the permissions granted in the Dublin 8 postcode since the adoption of the DCDP in 2016. It is noted that the tenure of the residential permissions is predominantly BtR. Having regard to this information, the proposed development would enhance the diversity of land use and the tenure of new homes in this area thereby providing choice for those seeking accommodation in this location.

This planning history also demonstrates that the population in the local area is set to increase dramatically and the inclusion of public open space with the diversity of uses proposed in this application is appropriate to contribute to the needs of the local area.

⁴ one of five administrative areas used by Dublin City Council to co-ordinate the delivery of services in the city

Application Reference	Development Description	Decision
<p>ABP-307067</p> <p>IDA Ireland, Newmarket, D8</p>	<p>Strategic Housing Development</p> <p>413 Build to Rent (BTR) units, 2 no. retail units, 1 no café/restaurant, artist studio and associated works.</p> <p>6 storeys (including setback) to Newmarket, stepping to 9-13 storeys towards St. Luke's Avenue (16.9m to 43.1m/43.6m (parapet/max height including lift overrun).</p> <p>50 car parking spaces and 550 cycle parking spaces.</p>	<p>ABP Granted Permission</p> <p>31st August 2020</p>
<p>DCC - 3323/17</p> <p>ABP-PL29S.300431</p> <p>IDA Ireland, Newmarket, D8</p>	<p>Mixed use – residential, commercial & cultural</p> <p>The proposed development is arranged in 4 no. blocks enclosing a central courtyard above lower ground level and double basement. The proposed development proposes the demolition of all existing buildings on site and the redevelopment of the site for mixed use purposes. Details include:</p> <ul style="list-style-type: none"> • A basement to provide 112 car parking spaces together with 195 no. bicycle parking spaces; • A western block (a part 5, part 7 and part 8-storey building) over lower ground and basement levels providing a hotel (7,797.72 sq.m GFA); • A southern block (part 5- and 6- storey building over basement comprising 743.71 sq.m (GFA) of retail floorspace at ground floor level and 34 no. residential units on the upper floor; • A northern block (part 7- and part 8- storey building) over lower ground and part double basement providing 58 no. residential units; • The eastern block is a part 4-, part 5- and part 6-storey building over lower ground and basement levels providing 7,346.00 sq.m (GFA) of office floorspace; • Landscaping measures in the courtyard and areas of public realm; and • A single storey artist studio unit of 44 sq.m (GFA) 	<p>DCC Granted permission</p> <p>ABP granted permission on appeal</p> <p>13 July 2018</p>
<p>DCC Ref. 2812/17</p> <p>The 'Brewery Block', Dublin 8</p>	<p>Mixed-use student accommodation and co-working space</p> <p>Permission for development at a 0.4274ha site known as a portion of Brewery Block, bounded by Newmarket, St Luke's Avenue, Brabazon Place/Brabazon Row and Ardee Street, Dublin 8.</p> <p>The site contains a Protected Structure (stone warehouse) at the corner of Newmarket and Brabazon Place/Brabazon Row.</p> <p>The proposed development comprises:</p> <ul style="list-style-type: none"> • Demolition of two existing industrial warehouses (1,236sq.m) and brick ruins (99sq.m); • Retention of the stone warehouse, the brick tower and the existing walls at ground floor level; and 	<p>DCC granted permission</p> <p>6th December 2017</p>

	<ul style="list-style-type: none"> Construction of a three to seven storey mixed-use development in two blocks (11,834sq.m GFA) comprising a co-working shared space with associated cafe/bar; and 349 no. student accommodation bedspaces with associated facilities, which will be utilised for short-term lets. 	
<p>DCC Ref. 3853/17</p> <p>ABP Ref. PL29S.302149</p> <p>43-50 Dolphin's Barn Street, Dublin 8</p>	<p>Mixed-use residential and retail</p> <p>The site is bound by Dolphin's Barn Street to the east, No. 51 Dolphin's Barn Street to the north east.</p> <p>The proposed development will include the demolition of the existing former factory building and buildings which front onto Dolphin's Barn Street (Nos. 43-50) and the construction of a part four to part seven storey residential and retail building fronting Dolphin's Barn Street and a basement level car park (13,150 sq.m GFA).</p> <p>The proposed development comprises:</p> <ul style="list-style-type: none"> 1 no. retail unit at ground floor (1,405 sq.m GFA); 70 no. apartments from first to sixth floor level comprising 41 no. 1 beds and 29 no. 2 beds (proposed as Build to Let accommodation); 2 no. residential entrances at ground floor level and communal facilities (410 sq.m GFA); 67 no. car parking spaces and 18 no. car parking spaces at basement level; A bike store providing 80 no. bicycle parking spaces and a bin store at ground floor level; and Landscaping works including a communal open space area at first floor level measuring 693 sq.m. 	<p>DCC granted permission</p> <p>ABP granted permission on appeal</p> <p>24 October 2018</p>
<p>DCC Ref. 3426/18</p> <p>The Donnelly Centre Phase 2 Building, Cork Street/Brickfield Lane, Dublin 8</p>	<p>Mixed use - student accommodation and commercial</p> <p>The proposal relates to student accommodation development of c.5,231sq.m GFA, to include a retail/enterprise unit at ground floor level (119 sq.m) as well as ancillary areas.</p> <p>The proposed development will consist of the demolition of the Donnelly Centre Phase 2 (c.728 sq.m GFA) and construction a development comprising:</p> <ul style="list-style-type: none"> 166 no. student accommodation bed spaces with associated ancillary areas (gym, common room, management, office reception and store room); A retail/enterprise unit (GFA 119 sq.m) in a five to seven storey high building over basement with frontage onto Cork Street and Brickfield Lane; Open space within a courtyard at ground floor level (GFA 234 sq.m); 82 no. cycle parking spaces are proposed at ground floor level; and A set down parking area and disabled car parking space. 	<p>DCC granted permission</p> <p>8th November 2018</p>

<p>ABP Ref. 305061</p> <p>355 South Circular Road, Dublin 8.</p>	<p>Student accommodation</p> <p>Strategic Housing Development</p> <ul style="list-style-type: none"> • The demolition of all buildings and structures (c.2,575 sq m) on site with the exception of the front Art Deco section of the building, which will be retained, restored to its original form, and incorporated into the proposed development; • Construction of a mixed-use building (with a total area of c.11,266 sq m) ranging in height from three to seven storeys over basement comprising a student accommodation scheme of 317 No. student beds arranged in 313 No. bedrooms (276 No. 1-bed bedrooms, 4 No. 2-bed bedrooms and 33 No. studios); • Café with an outdoor garden area; • 4 No. open courtyards (3 No. at Ground Floor Level and 1 No. at First Floor Level); • TV lounge; gym; cinema; communal areas; circulation areas; reception; library; and a meeting/event room; • Parking for 160 No. bicycles accessed directly from South Circular Road; 7 No. visitor bicycle parking spaces located to the front of the building off South Circular Road; • Associated works 	<p>ABP Granted Permission</p> <p>15th November 2019</p>
<p>ABP Ref. 303435</p> <p>Former Dulux Factory Site, Davitt Road, Dublin 12</p>	<p>Strategic Housing Development</p> <p>265 Build To Rent Units and 132 sq.m. of commercial floorspace with a building height of 3-7 storeys.</p>	<p>ABP Granted Permission</p> <p>17th April 2019</p>
<p>ABP Ref. 311591</p> <p>Heuston South Quarter, St. John's Road West/Military Road, Kilmainham, Dublin 8.</p>	<p>Strategic Housing Development</p> <p>Demolition of part of the podium and Basement Level -1 reinforced concrete slabs at the interface of the proposed Blocks A and B, construction of 399 no. Build To Rent apartments and associated site works.</p>	<p>ABP Granted Permission</p> <p>31st March 2022</p>

TABLE 3 APPROVED DEVELOPMENTS IN SURROUNDING AREA

5 Pre-Planning Consultation

In advance of lodging this application, the Applicant together with the appointed design team, engaged in section 247 preplanning meetings with representatives of Dublin City Council, and a pre-application consultation (PAC) meeting with An Bord Pleanála.

This section outlines the matters highlighted during pre-planning discussions with Dublin City Council. All matters were given due consideration by the Design Team in the proposed development as submitted.

Over the course of the design development phase, specialist design team members met with various works departments in DCC, landscape, engineering and traffic. The detail of those meetings is set out in the Landscape Design Statement, the Infrastructure Report and the Traffic & Transport Assessment.

5.1 DCC Preplanning No. 1

On the 12th August 2021, a representative of Dublin City Council's Planning Department and met with the Design Team met to discuss the proposed development. The focus of the discussion related to the scheme's compliance with the development management standards in the Dublin City Development Plan 2016-2022.

5.2 DCC Preplanning No. 2

On the 15th September 2021 representatives of Dublin City Council and the Design Team met again. It was highlighted at this meeting that the proposed development is compliant with the overall guiding principles for SDRA 12 and it was confirmed that the approach to height would be low-rise buildings that would build to a max. 24m toward the centre of the Bailey Gibson site.

5.3 ABP Pre-application Consultation

On the 11th March 2022, a meeting was held with representatives of An Bord Pleanála and Dublin City Council. The reference number for this meeting is ABP- 311959-21. The discussion focussed on the agenda items as follows;

1. Overall development Strategy for the SDRA and relationship with adjacent development.
2. Public open space strategy
3. Design and layout, including daylight & sunlight
4. Access and parking
5. AOB

The Opinion received on foot of the meeting stated;

"An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development."

A response to the 14 issues outlined in the Opinion is contained in a separate report which accompanies this application labelled Response to An Bord Pleanála Opinion.

It is noted that the community resource building within the diocesan lands in the plans submitted with the pre application consultation to An Bord Pleanála request does not form part of this application. The

car parking has increased from a ratio of 0.25 spaces per unit (which included the car sharing spaces), to 88 car parking spaces with a ratio of 0.26 spaces excluding the car sharing spaces.

5.4 DCC Preplanning No. 3

On the 6th April 2022 the Applicant and Design team met with representatives of Dublin City Council. The focus of the discussion was on the breakdown of public open space (POS) between the Dublin City Council owned land and the Applicant's lands.

The Table below identifies the proposed POS and the share that is being delivered on the Applicant's landholding and within the DCC landholding. The allocation of the majority of the open space to DCCs landholding is consistent with the indicative plan included in the DCDP and reproduced as Figure 3 of this report.

PUBLIC OPEN SPACE	APPLICANT	DCC	TOTAL
	[m ²]	[m ²]	[m ²]
PLAYERS PARK	330	3,852	4,182
% of Total	1.5%	17.7%	
ST TERESA'S PLAYGROUND	0	2,155	2,155
% of Total	-	9.9%	
REHOBOTH PLAZA	420	0	420
% of Total	1.9%	-	
MUNICIPAL PLAYING PITCH	0	12,344	12,344
% of Total	-	56.8%	
ST TERESA'S BOULEVARD	0	2,645	2,645
% of Total	-	12.2%	
TOTAL POS	750	20,996	21,746 m²
% of Total	3.4%	96.6%	

TABLE 4 PUBLIC OPEN SPACE BREAKDOWN BETWEEN APPLICANT AND DCC LANDHOLDINGS

The Applicant confirmed that it would be made clear in the application where an overlap in POS occurs between this proposed development and the extant Player Wills development.

The extant permission for Player Wills includes Players Park (3,960 sq.m) and to avoid double counting it is necessary to discount this area from the overall POS proposed.

$$21,746 \text{ sq.m} - 3,960 \text{ sq.m} = 17,786 \text{ sq.m}$$

It is noted that DCC confirmed in this meeting that the proposed 'St. Teresa's Boulevard' satisfied the requirements of POS.

6 Proposed Development

Key elements of the design approach are summarised as follows;

- Place-making – The proposed development aims to create a sense of place through a range of measures including high quality design, materials that reflect the site’s heritage but which also put a contemporary stamp on this new urban quarter and the provision of attractive, vibrant streets and public spaces.
- Enhanced Permeability - The extensive network of streets and public spaces, is designed to promote pedestrian activity through the site and optimise connectivity with the existing surrounding street network. These spaces are intended to enhance permeability and enable connections and integration with the wider SDRA 12 lands.
- Sustainability – The proposed development is intended to promote active modes of travel and contribute to decreased reliance on private vehicles. Energy efficiency will be promoted through the use of good quality external building materials and insulation, efficient heating systems, and sustainable water use and drainage design.
- Greening – biodiversity enhancement measures including planting of 300 new trees and pollinator friendly plants are at the heart of the landscape strategy.

The proposed design complies with and contributes significantly toward achieving the applicable guiding principles for SDRA 12 established in the Dublin City Development Plan 2016-2022.

- ✓ A vibrant mixed-use urban quarter will be promoted with complementary strategies across adjoining sites in terms of urban design, inter-connections and land-use.
- ✓ To accommodate a minimum 80 m by 130 m playing pitch .
- ✓ A new public park is proposed as a landmark feature with passive supervision by residential and other uses; it will have a comprehensive landscaping strategy to provide significant greenery within the scheme and will make provision for a diverse range of recreational and sporting facilities for use by the wider neighbourhood
- ✓ To acknowledge the existing sports lands of St Teresa’s gardens and its environs and act to retain and augment these lands as sporting facilities for the benefit of the wider community and use by local sports clubs.
- ✓ That at least 20% of the SDRA 12 be retained for public open space, recreation & sporting facilities including an area to facilitate organised games.
- ✓ Strong permeability through these lands will be encouraged to generate movement and activity east-to-west (connecting Dolphin’s Barn Street and Cork Street with Donore Avenue) and north-to-south (connecting Cork Street and Donore Avenue with the South Circular Road and Grand Canal corridor); a high-quality public domain, provision of pedestrian and cyclist routes and provision of active streets will be promoted.

An overview of the key development statistics is provided below.

Development Statistics	
Site Area	5.5 ha (gross)
Nett Density	225 units per hectare (based on 1.53ha Bailey Gibson site)
No. Units & Typology	345 units in 5 blocks, BG1-BG5 <ul style="list-style-type: none"> • 341 apartments, BG1-BG4 • 4 townhouses, BG5
Unit Mix	Studios – 10% 1-Bedroom – 57% 2-Bedrooms – 31% 3+ Bedrooms – 2%
Tenure	Build to Rent 85%: 292 units BG1-BG3 (inc. 10% social & affordable) Build to Sell 15%: 53 units BG4 and BG5
BTR Resident Support Facilities, Services & Amenities	1,188 sq.m total 4.1 sq.m per unit
Non-Residential Uses	1,120 sq.m total Creche, 2 commercial units, food & beverage unit, residents bulky item storage.
Building Height	Low Rise Residential as defined in 16.7.2 of DCDP 2016-2022 Area: Inner City Up to 24m (residential)
Car Parking ratio	Apartment ratio exc. car sharing scheme spaces: 0.26 per unit Houses: 1 per unit, 4 in total.
Bicycle Parking	784 spaces <ul style="list-style-type: none"> • 468 residents long-term, • 172 visitors short-term • 144 sports pitch users
Dual Aspect Units	42%
Public Open Space	21,746 sq.m
Communal Amenity Space	2,256 sq.m

TABLE 5 DEVELOPMENT SUMMARY

Below is a breakdown of the proposed development by block showing the number of units, the tenure and building height. All of the proposed blocks are within the 24m threshold for residential height in the inner city area.

Block	Tenure	No. Units	Max Storeys
BG1	BtR	151	7
BG2	BtR	89	7
BG3	BtR	52	5
BG4	BtS	49	4
BG5	BtS	4	3

TABLE 6 UNIT NUMBERS, TENURE AND BUILDING HEIGHT BY BLOCK

6.1 Statutory Notice Development Description

The development will consist of;

- i. the demolition of buildings and structures on the Bailey Gibson site, including 9 no. buildings (11,234.42 sq.m GFA) and 1 no. ESB substation (21sq.m) to make way for development of the proposed residential blocks. The demolition of the 2 existing structures on the St. Teresa’s Garden site has been permitted under the extant DCC Part 8 planning permission (Reg.Ref: 2475/18);
- ii. the construction of 345 no. residential units with a cumulative gross floor area of 25,521 sq.m distributed across 5 blocks (BG 1-5) all contained within the Bailey Gibson site, comprising;
 - a. BG1 (Build to Rent), ranging in height from 2-7 storeys incorporating 151 units comprised of 28 studios, 108 no. 1-bed, 10 no. 2-bed and 5 no. 3-bed apartments all with private amenity space in the form of balconies and ground floor terraces.
 - b. BG2 (Build to Rent), ranging in height from 2-7 storeys, incorporating 89 units comprised of 44 no. 1-bed and 45 no. 2-bed apartments all with private amenity space in the form of balconies and ground floor terraces.
 - c. BG3 (Build to Rent), ranging from 3-5 storeys, incorporating 52 units comprised of 5 no. studios, 30 no. 1-bed and 17 no. 2-bed apartments all with private amenity space in the form of balconies and ground floor terraces.
 - d. In BG4 (Build to Sell), ranging from 3-4 storeys in height, incorporating 49 units comprised of 15 no. 1 bed and 34 no. 2 bed units all with private amenity space in the form of balconies and ground floor terraces.
 - e. BG5 (Build to Sell), 3 storeys in height, incorporating 4 no. 4-bedroom townhouses all with private amenity space in the form of back gardens and 1 no. on curtilage car parking space per dwelling;
- iii. the construction of resident support facilities, services and amenities with a cumulative gross floor area of 1,189 sq.m comprising;
 - a. In BG1, a lobby/concierge office (104 sq.m at ground floor level) and recycling/waste areas (combined 47 sq.m);
 - b. In BG2, a gymnasium (262 sq.m), a lobby/concierge (111 sq.m) combined marketing/coworking space (96 sq.m) and a communal kitchen/living area including circulation (262 sq.m), residents lounge (29 sq.m), storage (175 sq.m) and a recycling/waste area (65 sq.m); and,
 - c. In BG3, a lobby (22 sq.m) and a recycling/waste area (16 sq.m).
- iv. 2,526 sq.m of communal open space distributed as follows; in BG1, (775 sq.m); in BG3, (527 sq.m); and in BG4, (315 sq.m) all in the form of courtyards with a podium level terrace included in BG2 (909 sq.m);

- v. 21,746 sq.m of public open space distributed as follows;
 - a. A multi-purpose play pitch within DCC lands to the northeast of the application area (12,344 sq.m);
 - b. A public boulevard, 'St. Teresa's Boulevard', to the south of the proposed pitch (2,645 sq.m);
 - c. A public park, incorporating a playground 'St. Teresa's Playground' and surrounding amenity space to the north of the proposed pitch (2,155 sq.m);
 - d. A public park ('Players Park') to the east of the Bailey Gibson site (4,182 sq.m); and,
 - e. A public plaza ('Rehoboth Plaza') at the entrance to the Bailey Gibson site (420 sq.m);
- vi. the construction of a childcare facility in BG1 with a gross floor area of 347 sq.m and play areas, combined 84.8 sq.m;
- vii. the construction of a combined 773 sq.m of commercial floorspace as follows;
 - a. in BG1, 2 commercial units (82 sq.m and 240 sq.m respectively) to facilitate a range of uses including Class 1 (shop), Class 2 (financial/professional services), Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall);
 - b. in BG2, 163 sq.m of commercial floorspace to facilitate a restaurant/café/bar at ground level and at basement level 288 sq.m of bulky item storage for tenants;
- viii. the provision of 88 residents car parking spaces at basement level including 10 disabled parking spaces and 36 spaces fitted with electric charging points. 12 motorcycle spaces will also be provided at basement level.
- ix. the provision of 11 resident's car parking spaces at podium level, including 1 disabled parking space and 10 reserved for a car sharing scheme, 'Go Car' or similar;
- x. 15 on street visitor car parking spaces (4 of which will be reserved for a car sharing scheme, 'Go Car' or similar), including 2 disabled parking spaces, together with 3 set down parking spaces for taxis and crèche drop offs and a loading bay to service the commercial units.
- xi. 33 on-street parking spaces for visitors to serve the playing pitch, being 4 spaces on Donore Avenue (including 2 disabled parking spaces), 20 spaces on Margaret Kennedy Road and 9 spaces provided along the proposed Western Connection Road west of the proposed playing pitch. The provision of a coach set down/visitor drop off on Donore Avenue adjacent to the pitch.
- xii. 468 long-stay bicycle parking spaces for residents and commercial units, comprising 207 spaces at basement level and 257 spaces distributed across 2 bicycle sheds, one located adjacent to BG1 (133 sq.m) and the other at ground floor within BG4 (47sq.m). 4 cargo bicycle parking spaces are provided at podium level for residents.
- xiii. 316 short-stay (visitor) bicycle parking spaces including 16 spaces for cargo bicycles, all at surface level.
- xiv. vehicular access will be from Rehoboth Place and vehicular exit will be via the existing access on South Circular Road. Provision of 4 pedestrian access points; 1 from the South Circular Road; 1 from Rehoboth Place 1 from Rehoboth Avenue and 1 from Donore Avenue. Within the site a network of new streets including a pedestrian and cycle link connecting the proposed multi-sport playing pitch with the wider development area is proposed. A new road is proposed south of the 'Players Park' to provide connectivity between the Bailey Gibson and Player Wills sites. The provision of a new road "Western Connection Road" from Margaret Kennedy Road along the western side of the Multi-Sports Playing Pitch;
- xv. on South Circular Road, removal of existing uncontrolled pedestrian crossing, and provision of a new signalised pedestrian crossing. Improvement to the footpath provision along South Circular Road opposite Rehoboth Place entry;
- xvi. replacement and realignment of footpaths to provide for improved pedestrian conditions along the western section of Donore Avenue. The installation of 1 controlled crossing and 1 uncontrolled

- crossing on Donore Avenue. The removal of 30 on-street car parking spaces on Donore Avenue adjacent the multi-purpose playing pitch (replacement with 33 spaces – see point xi.);
- xvii. on Rehoboth Avenue replacement of existing surface treatment to provide for a shared surface (home zone) environment.
 - xviii. partial realignment and widening of Rehoboth Place to provide a new carriageway width of 5m, and minimum footpath widths of 2m on both sides of the street including the removal of 3 on-street car parking spaces.
 - xix. all ancillary site development works including plant, meter rooms, rooftop solar photovoltaics, landscaping, boundary treatment and lighting.

6.2 Tenure

The proposed development is mixed tenure and provides units that accommodate purchase, rental and social and affordable needs.

The Build to Rent units (292) are contained in blocks BG 1-3 and the Build to Sell units (53) are contained in BG4 and BG5.

A Part V proposal is included under separate cover together with a Letter of Validation from Dublin City Council. The proposal includes 34 units (10% of the total) located within Block BG3 and the proposed mix is as follows, 4 (12%) studio units, 21 no. (62%) 1-bedroom units and 9 no. (26%) 2-bedroom units. The evidence of the transaction date of the Applicant's landholding is also included in the proposal to demonstrate that 10% is the applicable requirement.

6.3 Unit Mix

The proposed unit mix as a percentage of the overall development is:

- Studios – 10% (33 no.)
- 1 Bed Apartments – 57% (197 no.)
- 2 Bed Apartments – 31% (106 no.)
- 5 no. 3 Bed Apartments – 1% (5 no.)
- 4 no. 4-Bed Townhouses – 1% (4 no.)

Excluding the 4 town houses in BG5, the total number of apartments proposed is 341 and the unit mix is;

- Studios – 10%
- 1 Bed Apartments – 58%
- 2 Bed Apartments – 31%
- 3 Bed Apartments – 1%

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

The total number and mix of BtR units are set out below.

BTR Block	Studio	1-Bed	2 Bed	3-Bed	Total
BG1	28	108	10	5	151
BG2	-	44	45	-	89
BG3	5	30	17	-	52
Total	33	182	72	5	292
% of Total	11	62	25	2	-

TABLE 7 BTR PROPOSED UNIT MIX

SPPR 1 applies to the BtS units contained in block BG4, it allows apartment developments to include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios and no minimum requirement for three plus bedroom units. This is the policy that must be applied where a HNDA is not in place, as is the case for this proposed development.

BTS Block	Studio	1-Bed	2 Bed	3-Bed	Total
BG4	-	15	34	-	49
BG5	-	-	-	4	4
Total	-	15	34	4	53
% of Total	-	28	64	8	-

TABLE 8 BTS PROPOSED UNIT MIX

6.4 Density

The calculated net density on the Bailey Gibson portion of the site where the residential blocks are proposed is 225 units per hectare. It is noted that this application identifies this proposed density as a material contravention of the Dublin City Development Plan 2016-2022 and a Material Contravention Statement is submitted under separate cover that provides a justification having regard to the provisions of 39(2)(b) of the Planning and Development Act 2000, as amended.

Having regard to The National Planning Framework (NPF) which promotes higher density compact residential development on brownfield urban sites, by seeking to make better use of under-utilised land, including 'infill' and 'brownfield' and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport, the proposed density is appropriate given the National Policy Objective to increase residential density in existing urban infill locations.

The proposed development site is in a central and accessible location that benefits from excellent public transport accessibility, frequency and capacity. This is confirmed in the Traffic and Transport Assessment included under separate cover. The proposed height, massing and form of development is appropriate in the context of the overall regeneration objective for this strategic development regeneration area (SDRA). The site is therefore suitable for a higher density of development in accordance with the principles established in the National Planning Framework.

As outlined in the accompanying **Daylight and Sunlight Availability Assessment**, 100% of the new amenity spaces meet the new BR 209 (2022) recommendation for direct sunlight. In terms of the performance of the development, 73% of the units meet the minimum recommendation for Exposure to Sunlight. Further details in this regard can be reviewed within the Daylight and Sunlight Availability Assessment.

Density at 225 units per hectare is appropriate for this inner city location and in compliance with relevant national and regional planning policy and section 28 ministerial guidelines.

6.5 Plot Ratio & Site Coverage

The indicative plot ratios and site coverage provided for in the DCDP is as follows. While a very small area of Z2 zoned land is included in the application, development is not proposed at this location and so the indicative standards for Z2 are not applicable.

The DCDP states that *“plot ratios can determine the maximum building floorspace area or volume on a given site, but on their own cannot determine built form...consequently, plot ratio standards need to be used in conjunction with other development control measures, including site coverage, building height, public and private open space, the standards applied to residential roads, and parking provision.”*

Site coverage is a control for the purpose of preventing the adverse effects of overdevelopment, thereby safeguarding sunlight and daylight within or adjoining a proposed layout of buildings.

The indicative standards for each of the 3 zoning designations where development is proposed is set out in the Table below.

Having regard to the character of the surrounding area and the form of development within the Bailey Gibson site laid out as 5 blocks of residential units with a high quantity of communal and private open space, the site coverage and plot ratio are acceptable.

Zoning Objective	Plot Ratio (PR)	Proposed PR	Site Coverage (SC)	Proposed SC
Z14	1.0-3.0	0.15	50%	14.67%
Z4	2.0	1.76	80%	37.15%
Z1	0.5-2.0	0.76	45%-60%	32.27%

6.6 Non-Residential Uses

6.6.1 Commercial & Community

To provide for an attractive mixed-use neighbourhood, non residential uses are integrated with the residential use. This mixed use approach will foster a sense of community in this new urban neighbourhood while also enhancing the range of services and amenities in the wider area.

The scheme includes a childcare facility that will accommodate approx. 60 children. The creche is of a sufficient scale to accommodate all of the scheme's childcare demand, (see Childcare Demand Report) and it will be open for use by the wider community where a deficit in childcare is identified in the Social Infrastructure Audit. The layout of the creche has been given careful consideration and adequate clear floor space for each age category is provided in line with the Childcare Regulations. A dedicated secure outdoor play area is provided adjacent to the creche. Supporting rooms including a sleep area, kitchens, storage and welfare facilities are all integrated to the proposed design. Provision has been made for convenient drop off parking.

The range and scale of the other proposed commercial uses is informed by an analysis of the existing local context and permitted uses locally that will be implemented through other planning permissions. The information is presented in the SIA under separate cover. Importantly, the uses as proposed complement existing services in the wider area and would not undermine their viability.

Neighbourhood scale service providers will be accommodated in floorspace allocated in block BG1. Two units (240sq.m and 82 sq.m) are proposed and this application applies a range of uses (shop, professional services, health services) to them, to ensure that they offer the greatest degree of flexibility so as to ensure occupancy thereby safeguarding against vacancy issues. The classes proposed for this floor space also includes for community/arts and bingo hall use. Provision is made in the basement for bulky storage and this will be offered solely to residents of the proposed development.

In BG2, 163 sq.m of floorspace is allocated to food & beverage use, its positioning within the scheme would contribute to ground floor activation and vibrancy both during the day and night.



FIGURE 13 DISTRIBUTION OF NON-RESIDENTIAL USES

6.6.2 BtR Resident Services, Amenities and Facilities

Together with the wider non residential uses, the provision of dedicated communal services, amenities and facilities is recognised as an important element of the BtR model.

The DSfNA (SPPR 7(b)) provides the following guidance for what constitutes facilities as distinct from services and amenities.

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

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

This proposed development includes 3 BtR blocks, BG1-BG3 with 292 units. A diverse range of services, amenities and facilities are integrated to the design including a gym, communal lounge and kitchen areas, co-working space, concierge/lobby areas, maintenance and storage areas, recycling/waste areas. Together, the cumulative floor area is 1,189 sq.m and this equates to 4.1 sq.m of tenant amenities, facilities and services per unit.

In addition, the development provides extensive outdoor recreational amenity spaces including communal and public open space that benefit from excellent sunlight availability thereby offering attractive space to facilitate gathering.

In the absence of minimum published quantitative standards, a review of other permitted BtR schemes has been undertaken. It is noted that the number of bedspaces in a scheme is not readily available in the published information on the An Bord Pleanála website, and so, our analysis is confined to sq.m per unit. It is further noted that for some permitted schemes, the quantity of amenities and facilities is grouped in the reports.

Across the permitted schemes there is a wide range (1.7 sq.m per⁵ unit to 10 sq.m⁶ per unit) in the amount of tenant amenities and facilities provided. The lowest is for a development permitted in 2019 at Cookstown Industrial Estate, Tallaght and the highest relates to a combined student accommodation and BtR development in Dublin 8. It provides 10 sq.m per unit, however, it should be noted that the scheme is predominantly a student accommodation scheme with just 37 no. BtR apartments.

Our review concluded that the average BtR amenity, services and facilities provision nationally is approx. 4 sq.m per unit. For permitted schemes within the Dublin City jurisdiction, the average is 3.7 sq.m per unit, at 4.1 sq.m per unit the proposed development performs well.

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

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

6.7 Building Heights & Massing

While the guiding principles for SDRA 12 allows for up to two midrise buildings (up to 50 m) within the site, subject to the criteria set out in the standards section of the plan, this allocation has been used within the permitted Player Wills scheme.

Accordingly, all 5 blocks, BG1-BG5, are low-rise and below the 24m threshold for residential buildings in the inner city. Building Heights are thus compliant with the Dublin City Development Plan 2016-2022.

The building height generally builds towards the centre of the site flanking the proposed Players Park. The 7 storey elements terminate key vistas or address the primary open spaces.

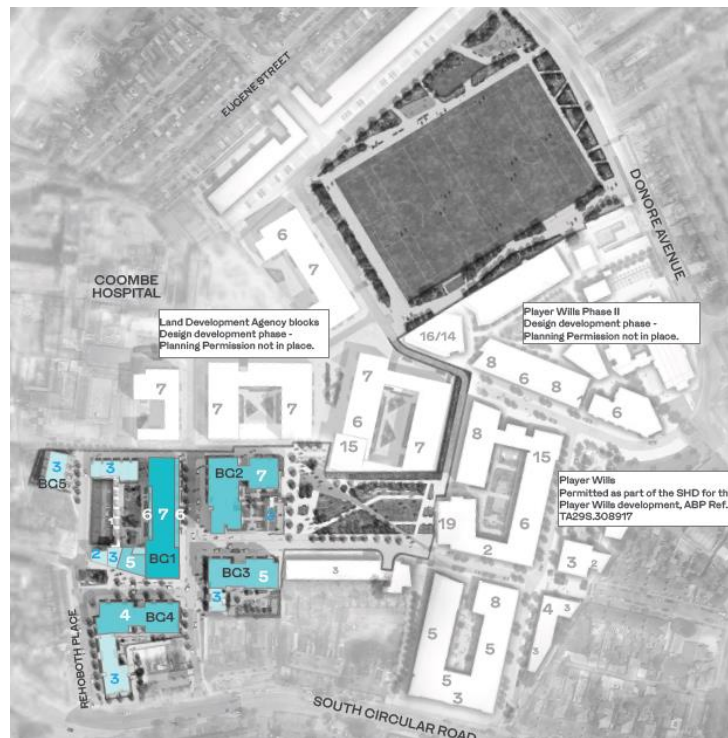


FIGURE 14 BAILEY GIBSON HEIGHT PLAN

As is illustrated on the plan, the perimeter blocks step down where they interface with adjoining 2 storey neighbourhood streets, these smaller scaled blocks enable the development to knit into its surrounding built environment.

6.7.1 Boundary Interfaces

6.7.1.1 Rehoboth Place Interface

BG4 along Rehoboth Place is kept at 3-4 storeys appropriate for its setting. Additionally, it is proposed to widen Rehoboth Place and approx. 13.3m is achieved between building facades. The image below illustrates the massing and the developments interface with both Rehoboth Place and South Circular Road.

6.7.1.2 Rehoboth Avenue Interface

Block BG1 steps from three storeys at its perimeter interface rising to 7 storeys, inclusive of a setback. To mitigate against a sense of overbearing, the seven storey element is placed south of the adjacent Rehoboth Avenue terrace houses. The scale of the massing directly opposing the terrace houses is proposed at seven storeys in height, but with a setback introduced at the sixth level. A distance of approx. 27.5 metres is maintained between building facades and a landscaped courtyard provides a visual and privacy buffer. Additionally, a bike shed provides an added level of privacy between adjacent gardens.

6.7.1.3 South Circular Road Interface

Cognisant of the existing low scale built environment, BG3 is prominently a five-storey block, and it reduces to three-storeys at its southern boundary interface. A distance of approx. 39m is maintained between opposing building facades namely the South Circular Road houses and BG3 five-storey massing. A landscaped courtyard provides a visual and privacy buffer. Additionally, to mitigate against overlooking the three-storey block gable ends its boundary with 338 South Circular Road and screening is provided to the balcony adjacent.

BG4 is a four-storey block and it reduces to three storeys along Rehoboth Place and South Circular Road, providing an appropriate interface with the adjacent two-storey houses. A distance of 22 metres is maintained between the four-storey massing and its adjacent South Circular Road housing, and a landscaped courtyard provides a visual and privacy buffer. Additionally and to mitigate against overlooking, the proposed units at this interface look in an east and west orientation and not in the direction of their South Circular Road neighbour.



FIGURE 15 BG4 REHOBOTH/SCR

BG3 is to the rear of the existing terraced housing on South Circular Road. South facing communal open space provides separation from the rear facade of the existing houses. The boundary wall condition is to be retained in this location. Privacy screens to the private amenity space of the unit to the very south of the block will be provided to prevent any overlooking of rear gardens.

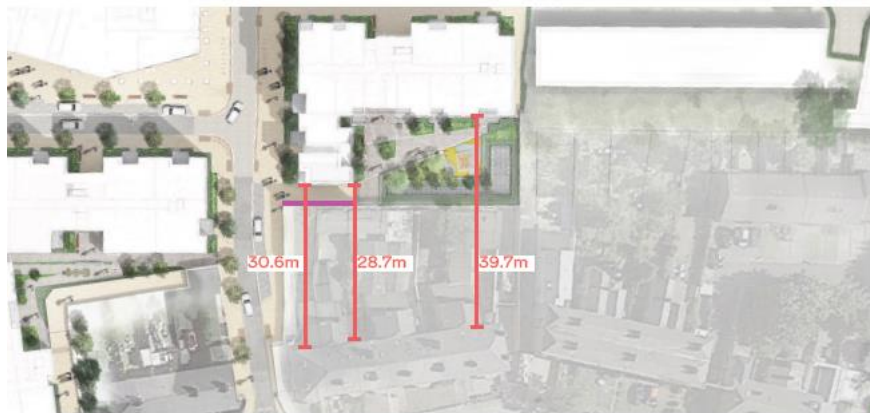


FIGURE 16 BG3 SEPARATION FROM SCR HOUSES

6.7.1.4 No. 40 Rehoboth Place

The existing No. 40 Rehoboth Place sits at the entry to the Bailey Gibson scheme. The vehicular access is proposed to the south through the proposed Rehoboth Plaza. To the North, the relationship of massing of BG1 to No. 40 creates a streetscape scale. A pedestrian and cycle access point is proposed here that continues along the axis of Rehoboth Place connecting to Cork Street.



FIGURE 17 NO. 40 REHOBOTH PLACE

6.7.1.5 Daylight & Sunlight

The design of the proposed blocks BG1-BG safeguards the daylight to nearby buildings. The Daylight & Sunlight Availability Assessment, included under separate cover, demonstrates there is a negligible impact on almost all of the surrounding buildings.

Having regard to the negligible impact that the proposed development will have on surrounding properties and to the need to deliver wider planning aims, including the delivery of housing, public amenities and the regeneration of an inner city vacant brownfield site, the impacts are on balance acceptable. Development of this site as proposed represents the interests of the common good for proper planning and long-term sustainable development.

6.7.1.6 Height Conclusion

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

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

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

6.8 Quality of Proposed Residential Development

The Housing Quality Audit confirms that the proposed development meets the quantitative standards established in the 2020 Sustainable Urban Housing: Design Standards for New Apartments and for block BG5, 4 townhouses, the design complies with the recommended minimum space requirements of 'Quality Housing for Sustainable Communities – Best Practice Guidelines for delivering Homes Sustaining Communities', 2007 and section 16.10 of the DCDP, Standards for Residential Accommodation.

It is noted that during the preparation of the Statement of Consistency with the Dublin City Development Plan 2016-2022, 3 material contraventions were identified;

- i. Density
- ii. Unit mix
- iii. Apartments per core per floor

A Material Contravention Statement is included with the application that provides a justification having regard to Section 37(2)(b) of the Planning and Development Act 2000 (as amended). Section 7 of this report should also be consulted for further detail.

6.8.1 Dual Aspect

SPPR 4 of the DSfNA (2020) deals with the minimum number of dual aspect apartments that may be provided within any single apartment scheme and states that a minimum of 33% dual aspect units will be required in more central and accessible urban locations where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

This proposed development site satisfies the criteria for central and/or accessible locations set out in section 2.4 of the Guidelines as it is within walking distance of a hospital and it is within walking distance, 5-minutes to high frequency urban bus services as established in section 2.2.2 of this report.

The proposal includes a total of 142 of the 341 apartment units as dual aspect equating to 42% of the units and well above the minimum requirement of 33%. This matter is analysed further in the Urban and Architectural Design Statement and the Dual Aspect Analysis Report.

6.8.2 Daylight

The Building Research Establishment (BRE) released new guidelines known as BR 209 (2022) which now supersedes BR 209 (2011). As a result, the accompanying **Daylight and Sunlight Availability Assessment** has been undertaken in accordance with the updated guidelines. In responding to relevant policy and the Board's Opinion, the assessment has been carried out in accordance with the most up-to-date versions of the following documents:

- BR 209 (2022) –Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice.
- BS EN 17037:2018 –Daylight in Buildings

Additionally, the Irish standard IS EN 17037:2018 –Daylight in Buildings was also included.

The report was divided into two sections:

1. the impact of the proposed development on the existing surrounding environment
2. the performance of the proposed development

In summary, it was established that the proposed development would have a negligible impact on the surrounding buildings and a minor adverse impact would be experienced for the nine identified properties on Rehoboth Avenue. The report also concluded that the five properties located at 330-338 South Circular Road will experience between a negligible and minor adverse impact. Further details in regard to the impacts are contained within the accompanying report.

In terms of the performance of the development, 100% of the proposed amenity spaces meet the BR 209 (2022) recommendation for direct sunlight. 73% of the units meet the minimum recommendation for Exposure to Sunlight. The report also outlines that there are four quality of views criteria, as follows:

- *100% of units meet the 100% of units meet the minimum requirement for clear glazing quality*
- *93% of typical rooms meet the minimum requirement for horizontal view angle.*
- *100% of rooms meet the minimum requirement for > 6m obstruction distance.*
- *76% of rooms meet the minimum requirement that greater than 75% of the utilised area should have a view of at least the landscape/cityscape.*

In terms of target illuminance, 35% of the rooms meet the target illuminance and minimum target illuminance recommendations provided in the main body of BR 209 (2022), BS EN 17037:2018 and IS EN 17037:2018. Notwithstanding this, 68% of the rooms meet the minimum target illuminance recommendations given in Appendix C of BR 209 (2022) and the national annex of BS EN 17037:2018. The use of this appendix and annex is recommended for “dwellings situated in a dense urban area”.

In line with relevant policy, the accompanying report provides compensatory measures (Section 7.4), as set out in the Building Height Guidelines.

The Building Height Guidelines state that **appropriate and reasonable regard** should be had to the quantitative approaches as set out in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. It is acknowledged in these Guidelines that, where a proposal does not fully meet the requirements of the daylight provisions, this must be clearly identified and a rationale for alternative, compensatory design solutions must be set out. The Bord can apply discretion in these

instances, having regard to local factors including site constraints, and in order to secure wider planning objectives, such as urban regeneration and an effective urban design and streetscape solution. (emp added) It is submitted that this proposed development secures wider planning objectives of regeneration, compact growth and housing delivery, such that the application of discretion is both appropriate and justified.

6.9 Landscape

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

The landscape scheme is informed by its context both culturally, historically and geographically and its objective is to maximise the sense of community, opportunities for interactions and engage with the locality.



FIGURE 18 PROPOSED LANDSCAPE DESIGN

The landscape design strategy is based on 3 principles:

- i Sociability – designing places to encourage social interaction and therefore building a sense of community. This strategy is employed both in the design of the public open spaces and communal areas.
- ii Play and Playfulness – providing play space and ensuring a playfulness in design to encourage opportunities for imaginative play across all ages and abilities.
- iii Sustainability – Sustainable Drainage and Biodiversity: The design incorporates green roofs and attenuating tree pits. 300 new trees will be planted together with pollinator friendly shrubs and flowers.

6.9.1 Public Open Space

The guiding principles for SDRA 12 are set out in Chapter 15 of the Dublin City Development Plan (DCDP) 2016-2022. With respect to public open space (POS) it requires that at least 20% of the SDRA 12 be retained allocated, and the overall guiding principles identify that the spaces should provide for recreation and sporting facilities including an area to facilitate organised games.

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

SDRA 12 encompasses an area of 12.62 hectares including St. Teresa’s Gardens, the former Player Wills and Bailey Gibson sites and the Coombe Hospital site. Accordingly, it is necessary to set aside 2.524ha as POS across the entirety of the SDRA.

The proposed development site is 5.5ha including 0.45ha that is not within SDRA 12. This area relates to surrounding public roads where works are proposed to facilitate access and connections to municipal services. Therefore, the SDRA 12 POS requirement applies to 5.05ha and accordingly 1.01ha is required to meet the Dublin City Development Plan requirement.

The following 5 areas are proposed and together will provide approx. 2.2 hectares of POS. This is more than double the required quantity and thus fully compliant with the Development Plan requirement.

1. A multi-purpose play pitch within DCC lands to the northeast of the application area (12,344 sq.m).



PLATE 10 SPORTS PITCH CGI

2. A public boulevard, 'St. Teresa's Boulevard', to the south of the proposed pitch (2,645 sq.m).



PLATE 11 ST. TERESA'S BOULEVARD

- A public park, 'St. Teresa's Playground' incorporating a playground to the north of the proposed pitch (2,155 sq.m).

ST. TERESA'S PLAYGROUND

- Legend**
- 1 St. Teresa's Playground
 - 2 Flexible Lawn
 - 3 Informal Play
 - 4 Planting
 - 5 Parking
 - 6 Multi-Sport Playing Pitch
 - 7 Exercise Area



Illustrative Plan

FIGURE 19 ST. TERESA'S PLAYGROUND

- A public park ('Players Park') to the east of the Bailey Gibson site (4,182 sq.m)



- Legend**
- 1 Cafe Terrace
 - 2 Sunken lawn
 - 3 Events Lawn
 - 4 Audience Hill
 - 5 Shared Surface Road
 - 6 Primary Pedestrian Route
 - 7 Play Area
 - 8 Market Space

FIGURE 20 PLAYERS PARK LAYOUT

- A public plaza ('Rehoboth Plaza') at the entrance to the Bailey Gibson site (420sq.m).



FIGURE 21 REHOBOTH PLAZA

6.9.2 Communal Open Space

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

- BG1 – 775 sq.m of courtyard
- BG2 – 909 sq.m of podium level terrace
- BG3 – 527 sq.m of courtyard
- BG4 – 315 sq.m of courtyard

In accordance with Appendix 1 of the Design Standards for New Apartments (2020), the minimum requirement is 1,912 sq.m and the proposed development incorporates 2,526 sq.m, this is approx. 32% over the required area. in the form of courtyards and ground and podium level terraces. Accordingly, the scheme exceeds the requirements of Appendix 1.

Courtyards will be programmed with BBQ areas, play areas, lawns, orchards, vegetable patches, water features and follies.

The individual courtyards and ground floor and podium level terraces integrate both hard and soft landscaping that provide variety both in form and use. An extensive tree planting schedule is proposed for enhanced biodiversity and to provide a sense of place. Formal and informal play areas together with seating, lawn areas and opportunities for community gathering are all features of the proposed design. Paving proposals for courtyards will have a rustic feel using a combination of paving flags and smaller setts and cobbles. Red carpet paving is also proposed which will draw occupants into the main open spaces including 'Players Park' within the development.

As is set out in Table 9 above, each of the 4 proposed communal open spaces meet and exceed the BRE sunlight requirement.



PLATE 12 BLOCK BG1 COURTYARD CGIS

6.9.3 Private Open Space

The Housing Quality Audit that accompanies this application demonstrates that the proposed private amenity space is compliant with Appendix 1 of the Apartment Guidelines. Notwithstanding the flexibility provided by SPPR 8(ii) of the Design Standards for New Apartments, regarding the provision of private amenity space for Build to Rent (BtR) proposals, the proposed design includes private amenity space for all of the proposed BtR units.

The primary type of private amenity are semi-recessed glass balconies. They maximise light penetration to individual units and enhance outward views. The semi-recessed design provides privacy and shelter such that the balconies can be used throughout the year.

The majority of ground floor apartments have an outdoor terrace which will be slightly raised above street level to assist with privacy. This design feature will also enhance passive surveillance of streets together with providing another layer of street activation.

The BG5 townhouses each have private rear garden space.

6.9.4 Boundary/Edge Treatment

A variety of edge and boundary treatments are proposed (see NMP Drawing L1-104 Boundary Conditions Plan). The existing boundary walls maintain their character where possible while the new boundary features replicate the traditional pattern of the immediate locality with respect to scale and material.



FIGURE 22 BOUNDARY TREATMENT

Access routes are proposed either side of the existing No.40 Rehoboth Place. Pedestrian, cycle and car traffic accessing from South Circular road enter the scheme to the south of No.40, while a pedestrian route connecting the scheme through to Rehoboth Place and Cork Street lies to the North.



PLATE 13 CGI VIEWS WITH NO. 40 REHOBOTH PLACE

6.9.5 Materials

Materials have been chosen to be both robust and timeless, provide texture and tone for visually impaired, to tie into the surrounding public realm while also seeking to provide integrated intuitive wayfinding.

The proposed material palette can be found within Section 06 - Hard Landscape Strategy and Palette of the Landscape Design Statement which also sets out the strategy for hard landscaping at the site.

High quality granite paving is rigid laid across the streetscapes, parklands, and boulevards. A colour variation distinguishes the streetscapes from the public parkland. It is interwoven through play areas, flexible lawn spaces, and serves to link the surrounding neighbourhoods to public open space. Paving proposals for courtyards will have a rustic feel to them using a combination of paving flags and smaller setts and cobbles.

Materials for street car parking will be delineated in a contrasting concrete or natural stone paving unit. A feature paving links Players Park with a visual way finder. The high quality paving is a motif with the theme of weaving a thread across the various sites. The path widens to create an informal gathering space and weaves into the market square where it blends into the park paving.



PLATE 14 HARD LANDSCAPE MATERIALS

Street furniture has been selected to adhere to an age friendly seating strategy, incorporating backs on seats with arm rests, all located at intervals for rest stops. Please refer to NMP Drawing No. L-901 for indicative hard landscape details.



PLATE 15 PAVING & STREET FURNITURE

6.9.6 Planting Palette

Planting styles and types will vary depending on use. Within the semi-private courtyards the palette should be softer, colourful and generally more shade tolerant. Within the public realm, plants will be more robust, evergreen and require less maintenance. Street trees will be tried and tested urban species. Roof gardens will be low water usage and wind tolerant species.



PLATE 16 PROPOSED TREE SPECIES



FIGURE 23 TREE HIERARCHY

The All-Ireland Pollinator Plan has informed the planting palette and soft landscape approach. This in conjunction with a selection of native plant species will characterise the landscape design. Planting will inform and define public routes to differentiate from communal or private space.

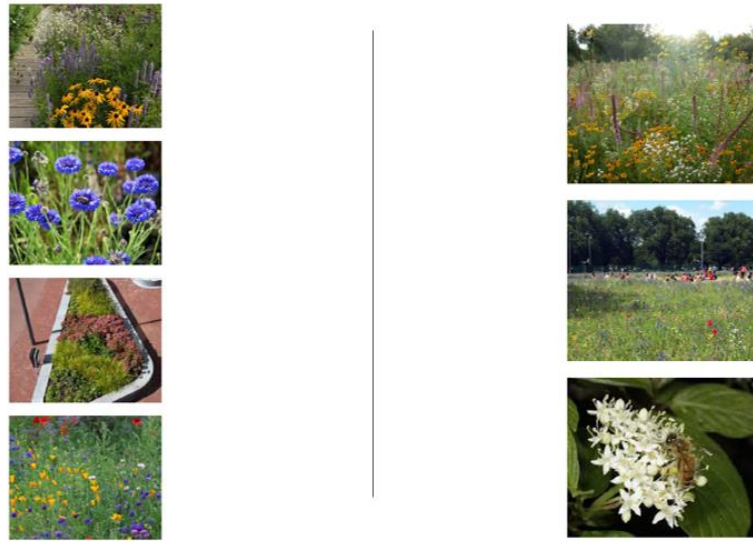


PLATE 17 POLLINATOR PLANTING

6.10 Access & Parking

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

The access and parking strategy for the proposed development has been designed to prioritise sustainable transport modes by reducing car parking for the apartments to 0.26 spaces per unit and providing 1 cycle parking space per bed space. Other measures to promote a modal shift include onsite parking for a car sharing scheme, providing permeability across the site such that active journey times could be reduced.

6.10.1 Vehicular Access

A one-way vehicular access system to the residential element of the proposed development i.e. at the Bailey Gibson site is proposed as the optimum design response. The site exit will be via the existing site access onto South Circular Road.

Entry will be via Rehoboth Place south of No. 40. This road will be widened to improve existing footpaths and provide a widened carriageway which will benefit both existing and future residents.

The decision to proposed the entrance to the south of No. 40 is derived from studies that demonstrated that HGVs and other vehicles would not be able to access the site to the north of No. 40. The benefits of this proposed location are;

- i. for pedestrians there is good visibility for crossing points allows for quality public realm space and desire line connections through to Dolphins Barn Street/Cork Street.
- ii. for general traffic movements, bringing car traffic south of no.40 will avoid any issues with pinch points and turning access for cars and larger vehicles. The proposed access point will make it safer for HGVs or Refuse trucks entering the Bailey Gibson lands, with improved room for turning and visibility of pedestrians and other vehicles.



FIGURE 24 PROPOSED VEHICULAR ACCESS – REHOBOTH PLACE

The access to the multi-purpose playing pitch on-street car parking will be from Donore Avenue, along Margaret Kennedy Road and the proposed new road, Western Connection Road, which will be a no through road with a turning facility for cars.

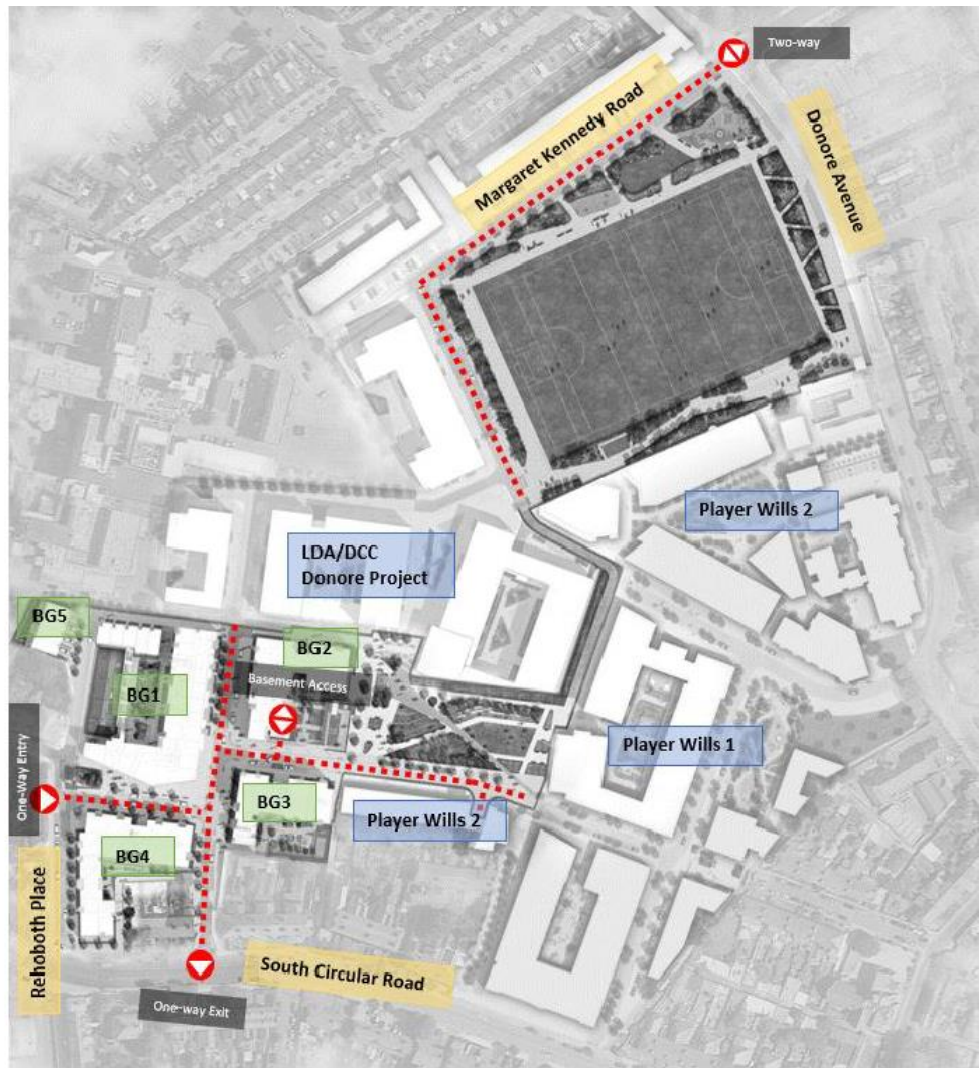


FIGURE 25 PROPOSED SITE WIDE VEHICULAR ACCESS

6.10.2 Pedestrian & Cyclist Access

Pedestrian Access to the external network is provided at multiple points across the development including Rehoboth Place, the South Circular Road and Donore Avenue. Within the site permeability is facilitated with footpaths provided through the site and a shared pedestrian/cycle path around the perimeter. A walking/cycling path is provided from Players Park to the south corner of the multi-purpose playing pitch to provide filtered permeability. The multi-purpose playing pitch is surrounded by paths and will be accessible from the north and east residential areas from Donore Avenue and Margaret Kennedy Road.

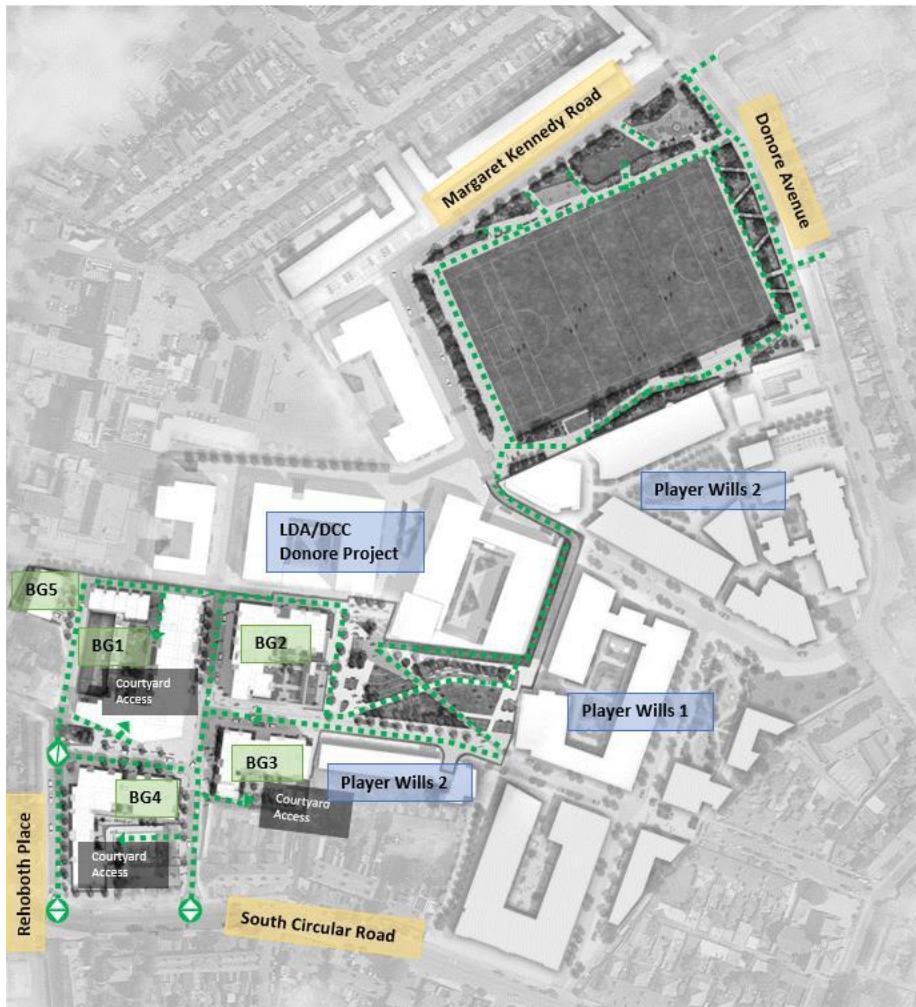


FIGURE 26 PEDESTRIAN ACCESS STRATEGY

Cycling Access follows the one-way system for vehicular traffic off the South Circular Road with additional accesses provided onto Rehoboth Place. There are shared pedestrian/cycle paths around the perimeter which also provide access to some of the long stay cycle parking. The 4m wide path from Players Park to the Multi-purpose Playing Pitch will provide filtered permeability for cyclist. The access to the multi-purpose playing pitch bike parking will be from Donore Avenue, along Margaret Kennedy Road and the proposed new road Western Connection Road, which will connect the Western Connection Road with the 4m wide path up to Players Park.

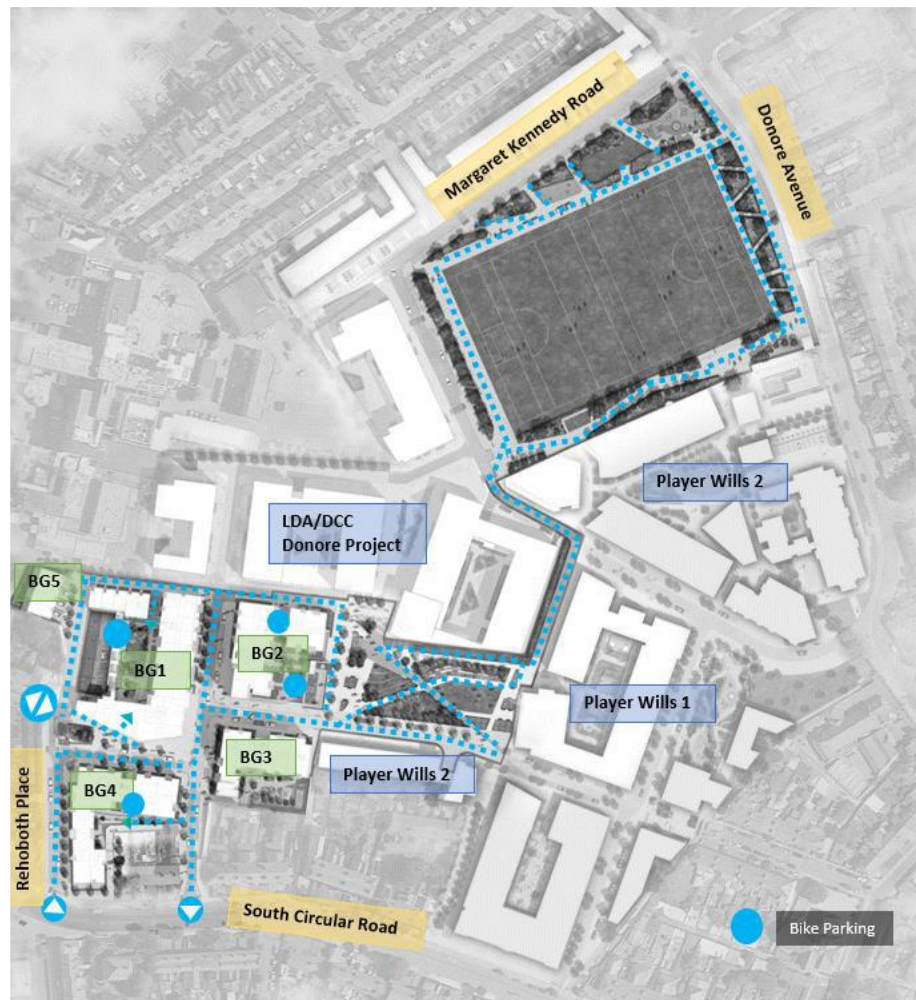


FIGURE 27 CYCLE ACCESS STRATEGY

6.10.3 Cycle Parking

Residents cycle parking is provided at a rate of 1 space per bedroom in line with the recommendation in the Design Standards for New Apartments, 2020.

A total of 468 long stay parking spaces for residents and employees of the creche and the other 3 commercial units. The distribution is as follows

- 207 spaces at basement level
- 257 spaces in 2 secure bicycle sheds one located adjacent to BG1 and the other at ground floor within BG4.
- 4 cargo bicycle parking spaces at podium level.

With respect to visitor (short-stay) parking, 316 spaces are proposed, distributed as follows;

- within the Bailey Gibson site 172 spaces including 8 spaces for cargo bicycles at surface level and
- 144 bike parking spaces including 8 spaces for cargo dedicated to the multi-sport playing pitch.



FIGURE 28 CYCLE PARKING LOCATIONS

6.10.4 Car Parking

The access to the multi-purpose playing pitch on-street car parking will be from Donore Avenue, along Margaret Kennedy Road and the proposed new road Western Connection Road, which will be a no through road with a turning facility for cars.

Car Parking is proposed as follows:

- At basement level, the provision of 88 no. car parking spaces including 10 disabled parking spaces. 20% of spaces will be fitted with electric charging points. 12 motorcycle spaces will also be provided at basement level.
- At podium level, the provision of 11 car parking spaces, including 1 disabled parking space and 10 no. reserved for a car sharing scheme, 'Go Car' or similar.
- 15 on street visitor car parking spaces (4 of which will be reserved for a car sharing scheme), including 2 disabled parking spaces, together with 3. set down parking spaces for taxis and crèche drop offs and a loading bay to service the commercial units.

Additionally, 33 on-street parking spaces are proposed for visitors to serve the playing pitch including 4 spaces on Donore Avenue (including 2 disabled parking), 20 spaces on Margaret Kennedy Road and 9 spaces provided along the proposed Western Connection Road west of the proposed playing pitch.

Access to the basement is proposed via a ramp access to the south of the BG2 building.

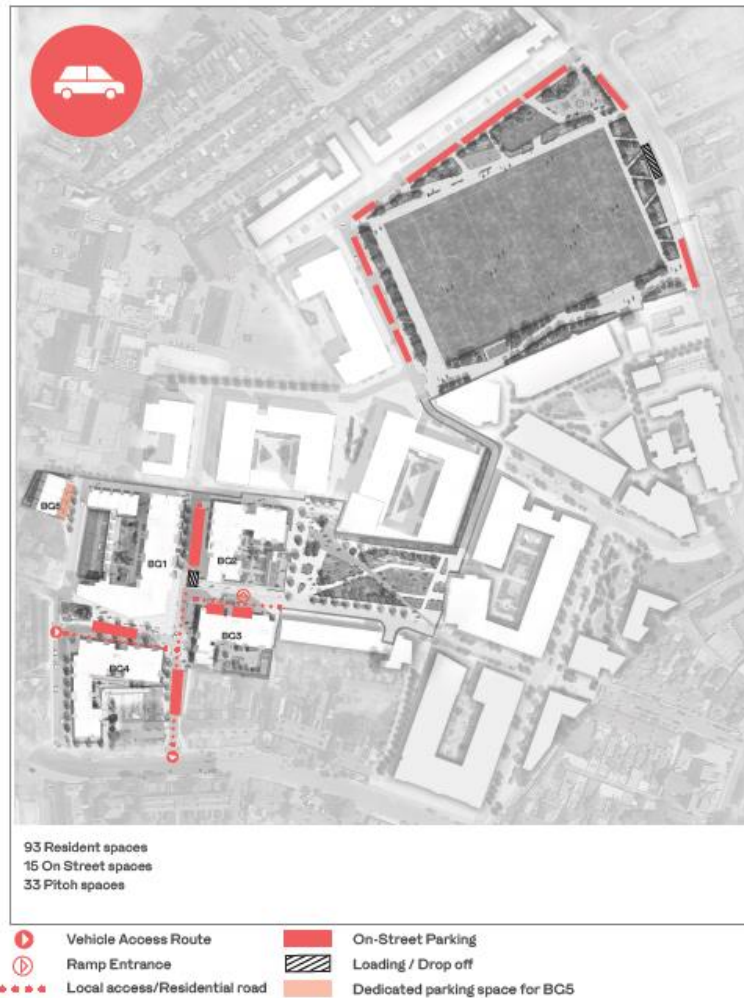


FIGURE 29 DISTRIBUTION OF SURFACE PARKING

The proposed level of car parking provision is at a rate of 0.26 spaces per apartment unit, commensurate with the site's proximity to Dublin City and accessibility to high capacity and high frequency public transport services. A comprehensive evidenced based justification for the parking ratio is set out in the Traffic and Transport Assessment.

6.10.5 Service Vehicles

Provision is made for set down areas/taxis within the Bailey Gibson site and on Donore Avenue as illustrated below. The space allocated within the Bailey Gibson site will facilitate 3 cars and will also act as the drop-off point for the proposed creche.

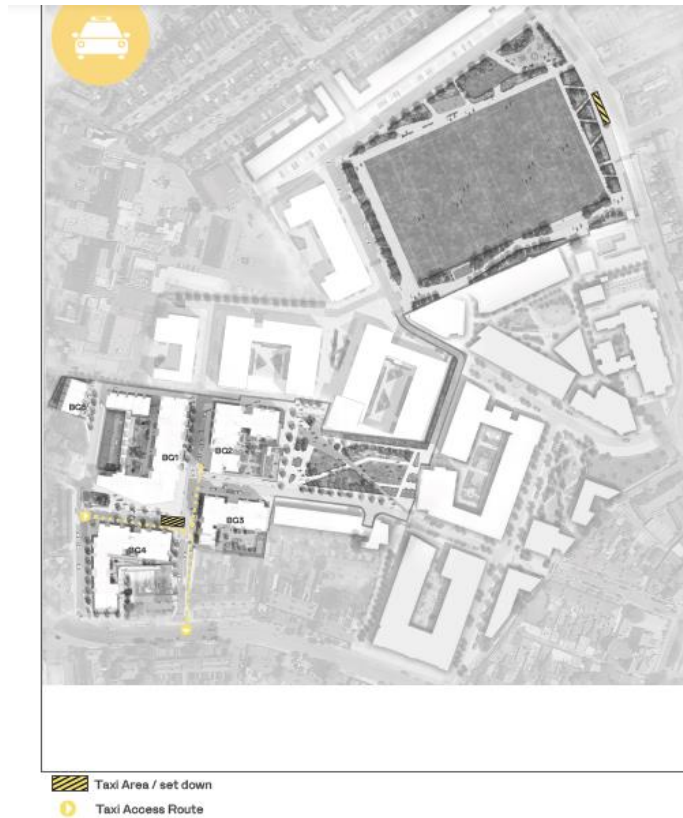


FIGURE 30 SET DOWN/TAXI AREAS

The internal road network has been designed to accommodate circulation of refuse vehicles. The bins from waste management areas at basement level will be brought on the day of collection by the management company out to set down areas. The proposed access strategy for refuse vehicles is illustrated below.

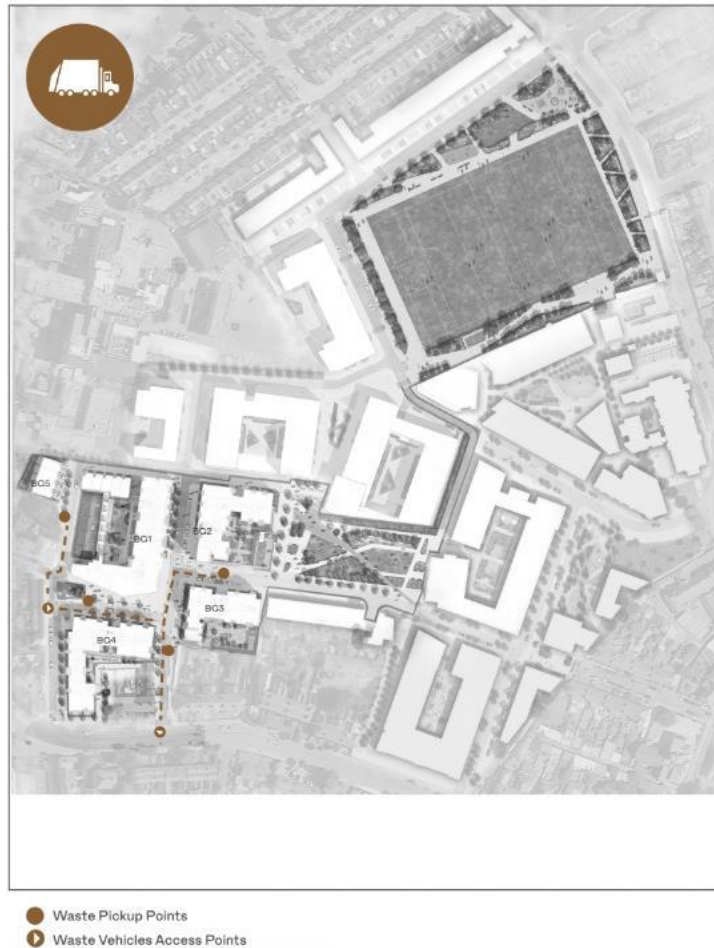


FIGURE 31 WASTE ACCESS & PICKUP STRATEGY

The access routes have been assessed using vehicle tracking to ensure a 11.2m refuse truck can use the accesses provided and navigate the internal road network easily. The results are shown on drawing, SYS-BG-5.

The access for fire tender vehicles has also been tracked to ensure emergency vehicles can safely access the entry and exit points and internal road network, A fire tender of 8.68m length has been tracked. The access strategy for the fire tender is shown below with the vehicle tracking shown in drawings, SYS-BG-4.1 & SYS-BG-4.2.

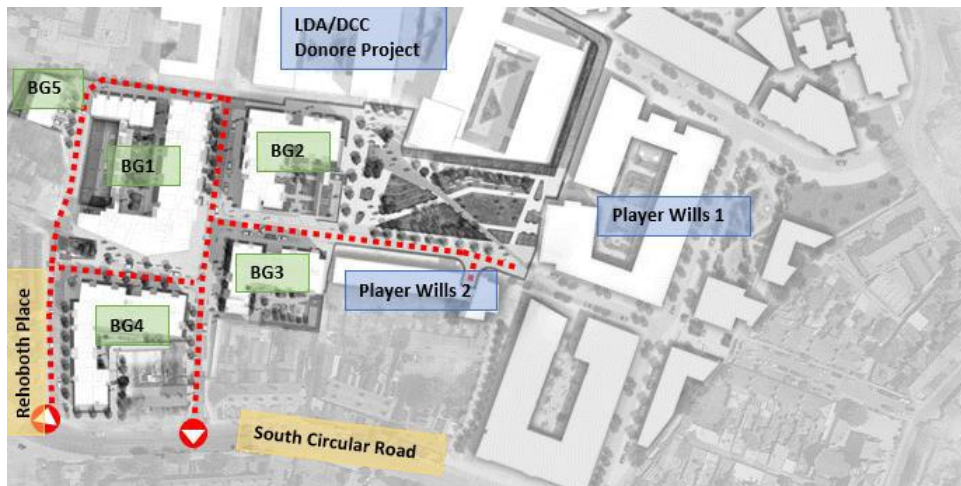


FIGURE 32 FIRE TENDER ACCESS STRATEGY

6.10.6 Internal Road Layout & Design

The internal roads have been designed to reduce vehicular speed and provide an environment which prioritises active modes, walking and cycling. The width of the internal roads vary between 4.8m (shared surface) to 5m for two-way roads with 3.7m widths provided on one-way roads to allow access for service and emergency vehicles.

Footpath widths have been maximised internally and range between 2m-8m in width. There are a number of informal crossing points around the development with dropped kerbs and tactile paving. There are also marked crossing points at the primary entry and exit points which will cater for existing pedestrians and future residents. 1.8m+ clearance has been maintained at any pinch points in line with the acceptable minimum outlined in DMURS.

Areas to be taken in charge have been designed in accordance with the Construction Standards for Roads and Street Works in Dublin City Council. The Taking in Charge plan is included in the NMP suite of drawings.

The existing footpaths and carriageway widths along Rehoboth Place south of No.40 will be widened using land from the Applicant's landholding. The carriageway and footpaths immediately outside of No.40 will be widened to improve access to the townhouses to the north of the site and accommodate emergency vehicles to both existing and future residents. This results in the loss of three existing on-street parking spaces.

Along Rehoboth Avenue it is proposed to provide a Home zone/ shared surface to resolve the pinch point between houses no. 1 and no. 36. One parking space along Rehoboth Avenue will be relocated from the east to west side of the road, with no parking spaces lost along this road.

The two main internal junctions will form a raised shared surface connecting to the road to the east which will eventually form a shared surface link between Bailey Gibson & Player Wills south of the proposed park, 'Players Park'. This area will have flush kerbing with tactile & contrasting paving marking

the edge of the footpath and start of the road carriageway to allow for visually impaired pedestrians to navigate the space.

The purpose of the shared space is to encourage pedestrian priority through the heart of the development, reducing vehicles speeds and contributing to the sense of place and quality of public realm. It is in line with the guidance set out in DMURS which states shared surfaces and junction are highly desirable where movement priorities are low and there is a high place value in promoting more liveable streets such as on local streets within neighbourhoods.

The link roads to the north and east have been provided with turning heads to allow vehicles to turn providing access to the on-street parking. Figure 5.5 and Figure 5.6 show the internal road layout in full. Please refer to Systra Drawings SYS-BG-1.1 and SYS-BG-1.2.

With respect to visibility splays, in accordance with DMURS, a sightline of 49m is required from the site exit at a setback of 2.4m based on the design speed along South Circular Road, 50kph. And a sightline of 24m from the exit along Donore Avenue. These visibility splay requirements are achieved for the proposed exit at the existing access points as shown below and in SYSTRA drawing SYS-BG-2.



FIGURE 33 VISIBILITY SPLAY AT SCR & MARGARET KENNEDY ROAD

6.10.7 External Road Improvements

A number of infrastructural measures are proposed to improve access for all modes to the site and limit the impact of any additional demand on the immediate network. As set out above, the width of Rehoboth Place to the west of the development site will be increased using land from the Applicant's landholding. This will improve access to the site and it will also improve the access and public realm for existing residents. Dropped kerbs to facilitate informal crossing points have been provided along Rehoboth Place and Avenue.

It is also proposed to relocate the existing informal pedestrian crossing across the South Circular Road to the west of the site exit point, east of its current location. This will improve visibility for oncoming traffic and provide a greater reaction time for drivers, particularly for bus drivers, and for pedestrians. The current location does not comply with the required sightlines in DMURS. The crossing will also provide a safer crossing point for bus users along the South Circular Road.

In addition to the crossing, the footpath to the south of South Circular Road opposite Rehoboth Place will be improved and a pedestrian refuge provided between the access to Priestfield Cottages and White Heather Industrial Estate. This is designed to reduce the crossing distance for pedestrians and encourage

lower vehicle speeds by passing and turning vehicles. The turning radius entering Rehoboth Place have also been reduced to shorten pedestrian crossing distance and encourage lower vehicular speeds.

The external networks improvements around the multi-purpose playing pitch include for the replacement and realignment of footpaths along the eastern section of Donore Avenue to provide for improved pedestrian conditions; the reinstatement of centreline markings along the road; the provision of 1 controlled crossing on Donore Avenue aligning with Ebenezer Terrace and 1 curtesy crossing including build out kerbs in Donore Avenue aligning with Brown Street. The location and design of external works are shown in drawings SYS-BG-1.1 and 1.2.

6.11 Drainage

A full description is contained in the Engineering Services Report that accompanies this application under separate cover and it should be read in conjunction with this section.

6.11.1 Foul Drainage

The new foul drainage system for the development will connect to the 1060mm brick combined sewer at the south-west of the site. Due to the topography of the site, a pump station with 24hour storage capacity will be located at the northern end of the development. Foul flows will be pumped to a final manhole for gravity discharge to the public combined sewer – this is confirmed as acceptable by Irish Water, which issued a Confirmation of Feasibility. Further, Irish Water issued a Statement of Design Acceptance. These letters are contained as appendix II(c) and II(d) of the Civil Engineering Infrastructure Report for Planning prepared by BMCE.

Foul wastewater discharge from the proposed development will be treated at the Irish Water Wastewater Treatment Plant (WwTP) at Ringsend prior to discharge to Dublin Bay. The Ringsend WwTP operates under licence from the EPA (Licence no. D0034-01) and received planning permission (ABP Reg. Ref.: 301798) in 2019 for upgrade works.

In relation to foul water, the AWN Hydrological & Hydrogeological Quantitative Risk Assessment (HHQRA) notes that the “peak wastewater discharge is calculated at 8.363 l/s (BMCE, 2022). The sewage discharge will be licensed by Irish Water, collected in the public combined sewer in Donore Avenue, and treated ultimately Irish Water’s WWTP at Ringsend prior to discharge to Dublin Bay.

Upgrade works commenced in 2018 at Ringsend and are expected to be fully completed by 2025. The upgrade works will result in treatment of sewage to a higher quality than current, thereby ensuring effluent discharge to Dublin Bay will comply with the Urban Wastewater Treatment Directive by Q4 2023.

The AWN report goes on to state that “the application for the upgrade of the WWTP in 2012 and the revised upgrade in 2018 was supported by a detailed EIAR. As outlined in the EIAR, modelling of water quality in Dublin Bay has shown that the upgrades (which are now currently underway) will result in improved water quality within Dublin Bay. The 2018 EIAR predicts that the improvement in effluent quality achieved by the upgrade will compensate for the increase in flow through the plant.

In addition, the EIAR report acknowledges that under the do-nothing scenario “the areas in the Tolka Estuary and North Bull Island channel will continue to be affected by the cumulative nutrient loads from the river Liffey and Tolka and the effluent from the Ringsend WWTP”, which could result in a deterioration of the biological status of Dublin Bay (Irish Water, 2018). Nevertheless, these negative impacts of nutrient over-enrichment are considered “unlikely” (Irish Water, 2018). This is because historical data suggests

that pollution in Dublin Bay has had little or no effect on the composition and richness of the benthic macroinvertebrate fauna. Therefore, the do-nothing scenario predicts that nutrient and suspended solid loads from the WWTP will “continue at the same levels and the impact of these loadings should maintain the same level of effects on marine biodiversity”. Therefore, it can be concluded that significant effects on the current status of the European sites within Dublin Bay from the current operation of Ringsend WWTP are unlikely. This conclusion is not dependent upon any future works to be undertaken at Ringsend.”

However, even without treatment at the Ringsend WWTP, the peak effluent discharge, calculated for the proposed development as 8.363 l/s (which would equate to 0.075% of the licensed discharge at Ringsend WWTP peak hydraulic capacity, would not have a measurable impact on the overall water quality within Dublin Bay and therefore would not have an impact on the current Water Body Status (as defined within the Water Framework Directive).

Ringsend WWTP has experienced capacity issues during rainfall events and therefore overflows can occur following periods of heavy rainfall. These overflows occur as a result of the impact on treatment capacity during heavy rainfall events due to surges primarily caused by the historical combined drainage system in Dublin. As the proposed development will not contribute any additional stormwater drainage to the WWTP over the natural greenfield rate, the development will therefore have no measurable impact on the water quality in any overflow situation.

Likely significant effects related to foul water management, arising as a result of the operation of the proposed development, on European sites (or on proposed Natural Heritage Areas), are therefore excluded as set out in the Appropriate Assessment Screening Report included under separate cover.

6.11.2 Surface Water

To facilitate a gravity connection to the public stormwater network and ensure no stormwater flows from any part of the proposed development site are directed to the combined sewer network, the new stormwater drainage system for the proposed development will flow generally northeast, through Players Park to the east of the Bailey Gibson site and the multi-sport playing pitch and its surrounds, before finally discharging to the existing stormwater culvert in Donore Avenue, close to Ebenezer Terrace.

The multi-sport playing pitch surface which forms part of this application, shall be a fast draining synthetic or similar type surface. Runoff from the pitch shall be attenuated by means of a hydrobrake located in the final manhole prior to discharge to the main surface water network upstream of the pitch side attenuation tank. Attenuation storage for the surface area of the pitch only shall be provided by a minimum 250mm deep crushed rock layer (minimum 20% void ratio) beneath the pitch surface. The existing 375mm diameter stormwater pipe, which is currently located under the multi-sport playing pitch site, will be diverted to the north side of the pitch and will not receive any additional stormwater flow from the proposed development.

The proposed Players Park to the east of the Bailey Gibson site, which also forms part of this application, *will have a significant area of soft landscaping throughout. Hard paved surfaces forming footpaths through the park will all drain to filter strips located along the verge/kerb line of each footpath or to tree-pits. From here, the stormwater will filter into the permeable hardcore build-up beneath the full area of the paved surface*

above. Essentially, this shall ensure that all stormwater in the park shall be capable of discharging to ground over the full surface area of the park. Due to the poor permeability of the boulder clays which are present at this site, and to ensure the ongoing functionality of the park during and after high intensity storm events, the filter strips will incorporate a land drain which will have an overflow connection to the main surface water network.

Part of the stormwater management strategy includes the construction of a stormwater attenuation tank to the north side of the proposed multi-sport playing pitch. This attenuation tank has been sized to cater for stormwater runoff from the Bailey Gibson site, the adjacent DCC owned land and any runoff from Players Park to the east of the Bailey Gibson site and the multi-sport playing pitch and surrounding landscaped areas.

6.11.2.1 Sustainable Urban Drainage Systems (SuDS)

Sustainable Drainage Systems are a collection of water management practices that aim to align modern drainage systems with natural water processes.

Integration of SuDS make urban drainage systems more compatible with components of the natural water cycle such as storm surge overflows, soil percolation, and bio-filtration, mitigating the effect development may have on the natural water cycle, particularly surface runoff and water pollution trends. In the context of this predominantly brownfield development area, the provision of the following sustainable drainage systems, along with the construction of separate foul and surface water networks, will result in a significant improvement on the public drainage system from current conditions and reduces flood risk.

- Ground level courtyards shall discharge surface water directly to ground. Hard landscaping zones within paved areas shall be drained to adjacent infiltration trenches within soft landscaped areas or SuDS Tree Pits, wherever practical to do so.
- Green Roofs Intensive – All roof terraces and podium terraces over basements shall be provided with a proprietary cellular drainage mat under the hard and soft landscaping to give a minimum interception storage volume of 10l/sq.m as well as contributing to filtration and attenuation of surface water. Extensive – All roofs accessed only for maintenance and repair will be provided with a sedum blanket over a proprietary cellular drainage mat to give a minimum interception storage volume of 10l/sq.m, as well as contributing to filtration and attenuation of surface water. Over 70% of the roofs of the Bailey Gibson development are green roofs.
- Typically, street and footpath surfaces shall be impermeable surfacing, with finishes of bitumen, stone pavers, concrete. To provide interception storage of surface water from these impermeable surfaces, they shall be drained to bio-retention tree pits via a series of road gulleys and linear drains.
- Basement: All basements shall be constructed as waterproof structures to prevent drainage of ground water. Incidental run-off from the basement entry ramp and cars etc. shall be directed to a suitably sized petrol interceptor prior to discharge via a pumped system to the foul drainage network.

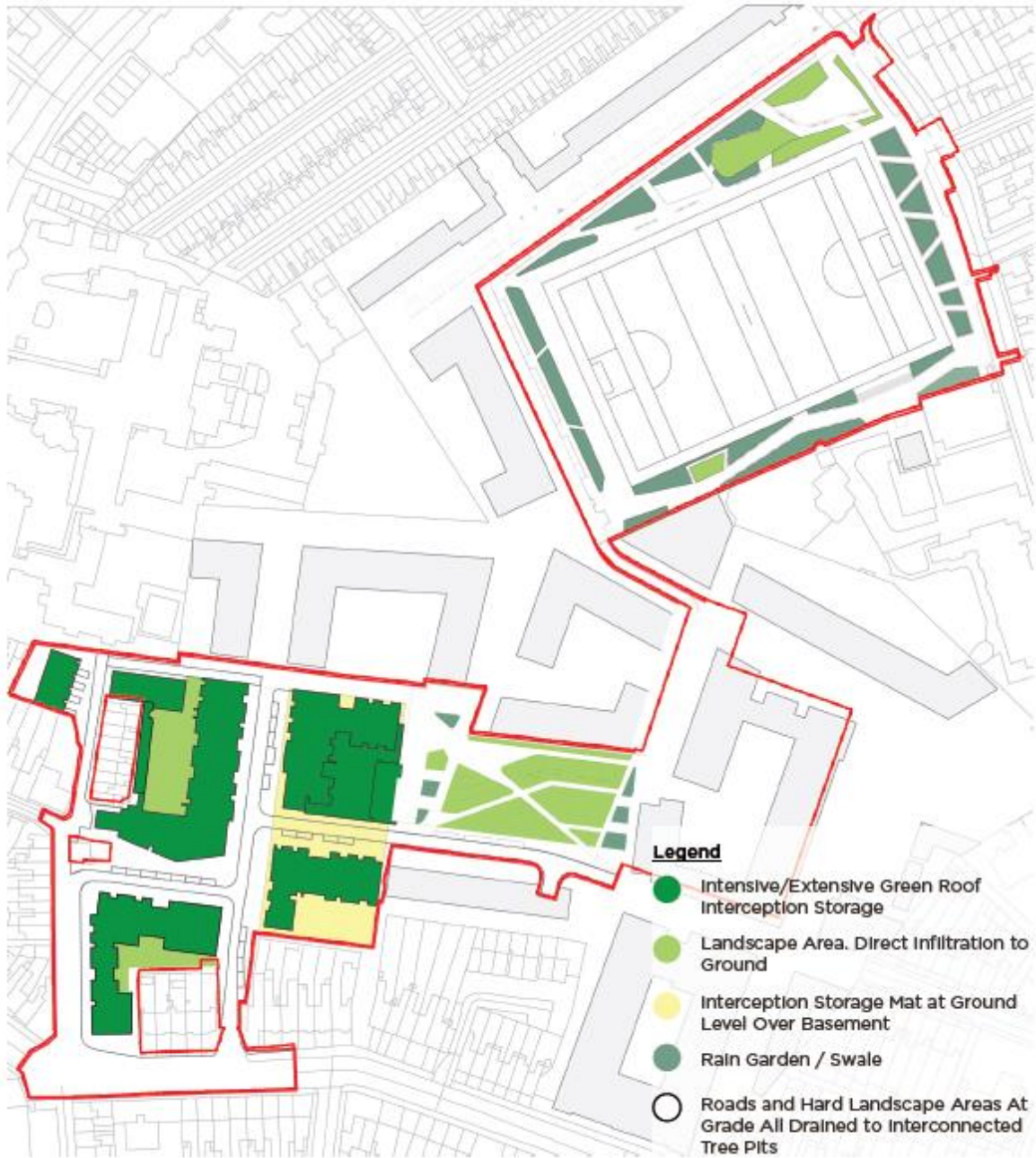


FIGURE 34 SUDS MEASURES

6.11.3 Water Supply

In accordance with Irish Water Code of Practice for Water Infrastructure (2020), a new 250mm diameter looped watermain is proposed to service the Bailey Gibson development with a connection to the 18-inch cast iron watermain in the South Circular Road. Water demand for the proposed development is as follows; Average – 2.119. Peak – 10.574 l/s and this is confirmed as feasible by Irish Water.

6.12 Sustainability

This application is accompanied by an Energy & Sustainability Report, and it should be referenced in conjunction with this section.

The proposed development is designed to meet Part L of the Building Regulations, the Nearly Zero Energy Building (NZEB) requirements and the measures included in the design would achieve a minimum A3 BER (Building Energy Rating) across the development.

6.12.1 Building Regulations

Part L 2021 (Dwellings) of the Technical Guidance Document has been issued by the Minister for Housing, Local Government and Heritage. This document is the new standard for dwellings constructed from 27th July 2021. The Part L 2021 (Dwellings) regulations set energy performance requirements to achieve Nearly Zero Energy Buildings performance as required by Article 4 (1) of the Directive for new buildings. The definition of Nearly Zero Energy Buildings is defined as:

“Nearly zero-energy building’ means a building that has a very high energy performance, as defined in Annex 1. The nearly zero or very low amount of energy required should be covered to a very significant extent by energy from renewable sources, including energy from renewable sources produced on-site or nearby”.

The residential units are designed in compliance with Regulations for the conservation of fuel and energy and will meet the requirements for Nearly Zero Energy Building (NZEB). Residential units will achieve a Building Energy Rating (BER) of A2-A3 and the non-residential elements will achieve an A3 BER.

To achieve these BER ratings it is necessary to incorporate renewable energy technologies. The proposed development incorporates roof mounted solar photovoltaic (PV) panels across all buildings. They convert solar radiation into electricity, which can be connected to the mains supply of a dwelling unit. The panels are placed on the roof and are most efficient with an incline angle of 30°. Panels are typically arranged in arrays on building roofs, with the produced electricity fed either directly into the apartment or into the landlord’s supply.

Additionally, exhaust air heat pumps may be utilised. They work by collecting warm air as it leaves a building via the ventilation system and then reuse the heat that would otherwise be lost to heat fresh air coming into the building. Exhaust air heat pumps operate on a similar basis to other heat pumps and are suitable for providing hot water and heating for apartments.

Air-Source Heat Pumps (ASHP) are deemed a renewable energy technology under Part L 2017 (NZEB). In heating mode, ASHPs are designed to extract heat from the ambient outside air and release it inside the building via heat emitters. In cooling mode, the cycle is reversed with heat being extracted from inside the building to the outside. This type of renewable energy source may be used in the proposed development.

A BEMS (Building Energy Management System) is to be installed in the non-residential areas to monitor the use of all major systems in the building, including space heating; space cooling; water consumption; and water leak detection. The BEMS system is a graphical interface which allows the facilities/building manager to monitor and control all systems throughout the building.

6.12.2 Ancillary Measures

The development will be designed and operated with the aim of a reduction in waste generation through construction and operation. Where possible waste streams will be separated on site and recycled or re-used. Where possible local materials will be specified, and in addition materials that contain recycled content will be considered as preferable.

The proposed development will incorporate measures to reduce water usage through the appropriate selection of low consumption sanitary fittings, leak detection systems and water monitoring facilities.

The proposed development will offer occupants travelling to and from the development alternative modes of transport other than the need to rely on a car. Developing in an area that has strong public transport nodes such as this location supports reductions in emissions together with increasing the availability of cycle infrastructure as is proposed in this development.

The proposed layout facilitates those wishing to own a electric vehicle with 20% of spaces fully fitted for charging and all other spaces future proofed to roll out as demand arises.

6.13 Development Phasing & Taking in Charge

Works will be delivered under a single construction phase i.e. all elements will be delivered together. Please see the Construction Environmental Management Plan for full details.

A Taking in Charge Plan is included in the NMP suite of drawings.

7 Statement of Consistency & Material Contraventions

This application is accompanied by 2 no. Statements of Consistency, one addresses the compliance of the proposed development with the relevant national and regional planning policies, including Section 28 Ministerial Guidelines. Compliance with the Dublin City Development Plan 2016-2022 is set out in a separate report.

Arising from this process, 3 material contraventions of the DCDP were identified and a Material Contravention Statement is submitted under separate cover pursuant to section 8(1)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act, 2016.

During the process of preparing the Statement of Consistency (SoC) with the Dublin City Development Plan 2016-2022, 3 material contraventions were identified. They are;

- iv. Density
- v. Unit mix
- vi. Apartments per core per floor

Section 37(2) of the Planning and Development Act 2000 (as amended) provides for the Board to grant permission where the proposed development materially contravenes the development plan, subject to paragraph (b) where it considers that one of the following criteria are met;

- i. the proposed development is of strategic or national importance,
- ii. there are conflicting objectives in the development plan, or the objectives are not clearly stated, insofar as the proposed development is concerned, or
- iii. permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or
- iv. permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

Set out below is a summary of the material contraventions and the provisions relied upon under section 37(2)(b) for each matter.

7.1 Density

Table E of the DCDP establishes that the estimated housing capacity for SDRA 12 is 800-1,000 units. Chapter 15 identifies that SDRA 12 includes St. Teresa's Gardens, the former Player Wills and Bailey Gibson sites and the Coombe Hospital site. Together it encompasses an area of 12.62 hectares. The overall guiding principles for SDRA 12 are set out under section 15.1.1.15 including a requirement to reserve 20% of the overall area as public open space (POS). The nett developable area of SDRA 12 is therefore 10.1ha and based on the max housing capacity, the nett density is 99 units per hectare (uph).

The nett density of this proposed development is 225 uph and accordingly it represents a material contravention of the DCDP.

It is submitted that the material contravention of density is justified having regard to;

- 37(2)(b)(i), specifically, the strategic importance of this proposed development.
- 37(2)(b)(iii) specifically relating to provisions contained in Ministerial Guidelines, namely, the Sustainable Residential Development in Urban Areas Guidelines, 2009 and the Design Standards for New Apartments – Guidelines for Planning Authorities, 2020, the policies in the National Planning Framework and Eastern & Midlands Regional and Spatial Economic Strategy.
- 37(2)(b)(iv) identified permissions for high density residential led schemes that do not align with the DCDP granted in the Dublin City Council area and specifically within the South Central Area, since the making of the development plan.

7.2 Unit Mix

Section 16.10.1 of the DCDP sets out details in relation to the mix of apartment units required for proposals of 15 units or more. Each apartment development shall generally⁷ comprise;

- A maximum of 25-30% one-bedroom units
- A minimum of 15% three- or more bedroom units

This mix does not apply to managed 'build-to-let' apartment schemes of over 50 units located within 500m (walking distance) of centres of employment or adjoining major employment sites. In these cases, there is an allowance for 42-50% of the total units may be in the form of one bed or studio units. It is considered that proposed development site being adjacent to the Coombe Women & Infants University where the workforce in April 2022, was 1,028, would represent a major employment site.

Excluding the houses in BG5, the total number of apartments proposed is 341 and the unit mix is;

- Studios – 10%
- 1 Bed Apartments – 58%
- 2 Bed Apartments – 31%
- 3 Bed Apartments – 1%

The scheme does not comply with the percentage requirements for 1 and 3 bedroom apartments established in the DCDP nor does it comply with the flexibility afforded to managed BtR schemes adjacent to major employment sites, max 50% studios and 1-beds. Therefore, it is concluded that a material contravention of the DCDP occurs.

It is submitted that the material contravention of unit mix is justified having regard to;

- 37(2)(b)(i), specifically, the strategic importance of this proposed development.
- 37(2)(b)(iii) specifically relating to provisions contained in the Design Standards for New Apartments – Guidelines for Planning Authorities, 2020, SPPR 1 and 8(i).
- 37(2)(b)(iv) identified permissions for unit mixes within residential led schemes that do not align with the DCDP granted in the Dublin City Council area and specifically within the South Central Area, since the making of the development plan.

⁷ Caveats apply none of which are relevant to this proposed development.

7.3 Units per Core per Floor

Section 16.10.1 of the DCDP, under the heading 'Block Configuration' states;

"There shall be a maximum of 8 units per core per floor, subject to compliance with the dual aspect ratios specified above, and with building regulations."

The design of the proposed development is compliant with the building regulations which set performance requirements for the built environment, including apartments and the proposed development achieves 42% dual aspect on this inner urban site.

The following is the proposed units per floor per core in each block;

- Block BG1: 23 units and 2 cores = 11.5 units per core
- Block BG2: 14 units and 2 cores = 7 units per core
- Block BG3: 10 units and 1 core
- Block BG4: 14 units and 2 cores = 7 units per core

Therefore, 2 of the proposed blocks, BG1 and BG3, breach the DCDP requirement of 8 units per core per floor and there is a material contravention.

It is submitted that the material contravention of units per core per floor is justified having regard to;

- 37(2)(b)(i), specifically, the strategic importance of this proposed development.
- 37(2)(b)(iii) specifically relating to provisions contained in the Design Standards for New Apartments – Guidelines for Planning Authorities, 2020, SPPR 8(v).

8 Conclusions

The design of the proposed development has been informed by an understanding of the site context and complies with the guiding principles for SDRA 12.

The overarching objective is to create a new and sustainable urban neighbourhood that can aid in securing the long held regeneration objectives for this site. The current proposal achieves this by providing opportunities to enhance permeability and connectivity and through a mix of residential and supporting neighbourhood scaled commercial uses including a childcare facility together with significant public open space that will support organised games, children's play, active and passive recreation. This is a major planning gain for future occupants of the proposed development site but also the wider Dublin 8 area.

The proposed development responds to an identified housing need by incorporating a mix of tenures and unit sizes that will address the shortfall in housing supply locally and within the wider City.

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

The design and layout of the proposed development will ensure the highest standards of urban design and sustainability are achieved, in a manner that responds to the established residential setting. The proposed redevelopment of this site achieves the principles of proper planning and sustainable development, having regard to;

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