

Statement of Consistency National, Regional & Section 28 Guidelines

Bailey Gibson 2

Proposed Strategic Housing Development

July 2022



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1. Introduction

This Statement of Consistency (SoC) has been prepared by McCutcheon Halley Chartered Planning Consultants in collaboration with the appointed Design Team on behalf of the Applicant, CWTC Multi Family ICAV acting solely in respect of its sub fund DBTR SCR1 Fund. A separate Statement of Consistency has been prepared in relation to compliance with the Dublin City Development Plan 2016-2022.

The Applicant is applying for permission for a Strategic Housing Development (SHD) to An Bord Pleanála (ABP) in compliance with Section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

A description of the development is set out in Section 2 of this report. Broadly, it is proposed to develop a residential led mixed use scheme Former Bailey Gibson Site, former Player Wills Site, Dublin City Council land (formerly Boys Brigade pitch and part of St. Teresa's Gardens (all within Strategic Development Regeneration Area 12)), South Circular Road and Donore Avenue, Dublin 8.

The proposed development site is wholly within the area identified as Strategic Development Regeneration Area (SDRA) 12, St. Teresa's Gardens & Environs in the Dublin City Development Plan 2016-2022 (DCCDP).

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

A Material Contravention statement prepared by MHPlanning is submitted under separate cover. This report addresses 3 material contraventions of the DCDP. They are:

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

1.1 Purpose of Statement of Consistency

This Statement of Consistency assesses the proposed development against relevant national and regional planning policy and relevant guidelines issued by the Minister under section 28 of the Act of 2000.

The following is a list of the plans and guidelines considered in this report:

- Project Ireland 2040, National Planning Framework (2018)
- Eastern and Midlands Regional Spatial and Economic Strategy (2019)
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)
- Housing for All: A New Housing Plan for Ireland (2021)
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)

- Urban Development and Building Heights - Guidelines for Planning Authorities (2018)
- Design Manual for Urban Roads and Streets (2019)
- Sustainable Residential Development in Urban Areas - Cities, Towns & Villages (2009)
- Urban Design Manual – A Best Practice Guide (2009)
- Childcare Facilities Guidelines for Planning Authorities (2001)

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

It is noted that a separate Statement of Consistency setting out how the proposal will be consistent with the objectives of the relevant development plan, in this case, the Dublin City Development Plan is included under separate cover. That report identifies four matters that could be deemed a material contravention of the Plan; density, apartment unit mix, and number of apartments per core. A Material Contravention Statement has been prepared and a justification is provided having regard to the provisions of section 37(2) of the Planning and Development Act 2000 (as amended).

2. Description of Development

The design rationale is to create and deliver a high quality, sustainable, residential led mixed use strategic housing development within this inner-city regeneration site that complies with the guiding principles for development within SDRA 12 as established in the Dublin City Development Plan 2016-2022.

The Proposed Site Layout is illustrated on **Drawing No. PL0005** contained within the architectural suite of drawings.

A comprehensive description of the proposed development is set out in the Planning Statement. The Statutory Notices should also be referenced.

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.

All apartments have private amenity space. At ground floor this is in the form of terraces and on upper levels, balconies. Each of BG1-BG4 have communal amenity areas either as a courtyard or podium area.

Tenant amenities and facilities are proposed in the BtR blocks and include a gym, co-working space, kitchen/lounge areas, concierge, and waste facilities.

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 together with storage for residents bulky items.

In total there are 89 car parking spaces allocated to the proposed apartments and all are contained within the Bailey Gibson site. Apart from 1 space at podium level, the parking is contained within a basement. Additionally, 10 'GoCar' spaces are proposed at podium level for residents use only. Each of the 4 townhouses has 1 on-curtilage car parking space.

Visitor parking is at street level and the proposed sport pitch will be serviced separately by new spaces on the public roads. The scheme includes set down parking for the creche, a loading bay for deliveries and coach parking area.

Provision is made for disabled parking, electric vehicle charging, a car sharing scheme and motorcycle parking. 784 spaces are proposed for cycle parking including secure residents parking, visitor parking and spaces for cargo bicycles.

Other works include the development of a network of streets across the proposed development site that will link with other sites within SDRA 12 and into the wider street network of Dublin 8. Improvement works within existing local streets to facilitate access and safe movement.

Ancillary development works includes the construction of electricity substations, meter rooms, plant rooms at basement level, waste storage areas, solar photovoltaics, drainage, landscaping, and lighting.

The scheme includes 341 apartments and 4 houses. Blocks BG1-3 are Build to Rent and incorporate 292 units. Blocks BG4 and BG5 are Build to Sell with 53 units. The ratio of BtR to BtS is 85:15.

The mix of units together with detail of their distribution across the blocks is presented below.

Building Ref.	Studio	1 Bed	2 Bed	3 Bed	4 Bed House	Total
Build to Rent (BtR)						
BG 1	28	108	10	5	-	151
BG 2	-	44	45	-	-	89
BG 3	5	30	17	-	-	52
Total BTR	33	182	72	5		292
Build to Sell (BtS)						
BG 4	-	15	34	-	-	49
BG 5	-	-	-	-	4	4
Total BTS	-	15	34	-	4	53
Overall Total	33	197	104	5	4	345

Table 1 Unit mix

The proposed mix as a percentage of the total 345 units is;

- Studios – 10%
- 1 Bed Apartments – 57%
- 2 Bed Apartments – 30%
- 3 Bed Apartments – 2%
- 4-bed Townhouse – 1%

The proposed Build to Rent mix as a percentage of the total 292 units is;

- Studios – 11%

- 1 Bed Apartments – 62%
- 2 Bed Apartments– 25%
- 3 Bed Apartments– 2%

The proposed Build to Sell mix as a percentage of the total 53 units is;

- 1 Bed Apartments – 28%
- 2 Bed Apartments– 64%
- 4 Bed Townhouses – 8%

The proposed tenant amenities (gym, lounges, co-working, bin storage etc.) provide a shared environment for the Build to Rent occupants to be part of the community. The floor area would provide 2.66 sq.m per unit and this compares very favourably with similar permitted schemes in the city.

Vehicular access to the Bailey Gibson site is proposed via 2 entrances comprising 1 entry-only access via Rehoboth Place and 1 exit-only access via South Circular Road. The design also includes a vehicular access at the north-eastern corner of the site via Donore Avenue to facilitate access to the proposed sports pitch.

The internal street network is designed to provide connectivity across the proposed development site and would link with the permitted Player Wills scheme (ABP Ref. Ref: 308917) also within SDRA 12.

Three pedestrian/cyclist access points are proposed from South Circular Road, Rehoboth Place, Rehoboth Avenue and Donore Avenue.

The public open space (POS) and communal open space is varied and provides opportunities for active and passive recreation together with play. Opportunities that would contribute to building a sense of community are maximised in the design so as to encourage interactions and engagement. There is clear hierarchy of spaces distributed across the scheme that provide for the needs of all users regardless of age and ability. The planting proposals prioritise native species, pollinators and generally seeks to enhance biodiversity value. The landscape design is fully coordinated with the surface water drainage design and encompasses sustainable urban drainage systems (SuDS). The sunlight analysis demonstrates that all open spaces benefit from good levels of sunlight.

The proposed creche is designed to cater for approx. 60 children. The scheme will generate a need for approx. 11 childcare spaces and so there is a significant overprovision which will be available to the wider community. The location of the creche at the Rehoboth Plaza entrance facilitates convenient access for parents dropping children.

The proposed Site Layout is shown below.

3. Statement of Consistency

3.1 Project Ireland 2040: National Planning Framework

Policy Objective & Provision	Statement of Consistency
<p>2a - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.</p>	<p>✓ The proposed development is located within Dublin City.</p>
<p>3a - Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements.</p>	<p>✓ The proposed homes would be located on a brownfield vacant inner city regeneration site that is surrounded by the built urban area.</p>
<p>3b - Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</p>	<p>✓ The proposed development will deliver 345 homes on an inner-city regeneration site.</p>
<p>4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</p>	<ul style="list-style-type: none"> ✓ The proposed development is mixed tenure – this approach avoids the polarisation and negative outcomes that are often created by separated single-tenure neighbourhoods. ✓ Unit sizes range from studio apartments to 4-bedroom houses allowing people the opportunity to move within the development as their needs change. ✓ The supporting information included with this application demonstrates that future occupants would enjoy a high standard of amenity in terms of daylight, access to private and communal amenity space, and energy efficient homes. ✓ The access strategy together with the internal street network is designed to provide permeability within the SDRA 12 area and to

Policy Objective & Provision	Statement of Consistency
	<p>connect with the existing communities beyond.</p> <ul style="list-style-type: none"> ✓ The range and quality of public open space will encourage high usage and community integration. ✓ Both formal and informal exercise opportunities is integrated, and this will have health benefits. ✓ By providing homes within easy reach of employment opportunities quality of life will improve as commute times are reduced. ✓ The creche will serve the needs of the new and existing community. ✓ Communal amenities (gym, lounges etc) will provide the rental community the opportunity to develop a sense of community. ✓ Commercial units are proposed within BG1 and BG2 which will bring animation to the streetscape. In particular, the commercial unit proposed in BG1 at the neighbourhood intersection will encourage public surveillance within the development. <p>The proposed development is accompanied by a comprehensive suite of reports that demonstrate the high-quality place that would emerge at this location.</p>
<p>5 - Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.</p>	<ul style="list-style-type: none"> ✓ The proposed development will add to the densification of Dublin's inner-city area. ✓ Increasing density supports public transport improvements as critical mass is a determining factor in spending. ✓ The addition of high-quality homes will enhance the international competitiveness of Dublin City, supporting continued FDI and attracting foreign workers.
<p>6 - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population</p>	<ul style="list-style-type: none"> ✓ The proposed development will contribute to creating a new urban quarter in Dublin 8. ✓ It will regenerate a vacant brownfield and undeveloped site that currently detracts from the amenity of the area. ✓ The redevelopment of this brownfield site and associated lands will improve connections and permeability through these lands to the adjoining City Council public open space in the

Policy Objective & Provision	Statement of Consistency
<p>and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.</p>	<p>north and east, Coombe Hospital to the north-west, the established residential community to the south, and St. Catherine’s National School and Donore Avenue to the east.</p> <ul style="list-style-type: none"> ✓ The insertion of a high-density residential scheme will rejuvenate the area bringing a level of activity that is currently absent.
<p>7 - Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on inter alia:</p> <p>Dublin</p> <p>Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;</p> <p>Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;</p> <p>In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.</p>	<ul style="list-style-type: none"> ✓ The proposed development is located on an inner-city regeneration site proximate to centres of employment. ✓ The site’s zoning facilitates high density residential development together with commercial uses. ✓ The redevelopment of this site will contribute to the realisation of regeneration objectives for these lands. ✓ The proposed development is located in close proximity to high-capacity LUAS services and high frequency urban bus services and will help to reduce car dependence in Dublin City. ✓ The proposed development includes apartments (including studio, duplex, and triplex units) and townhouses which are located in close proximity to Dublin City and public transport links thus reducing the need for future unplanned growth of commuter settlements.

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<p>8 - To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out for Dublin of an increase in population of approximately 20-25% (or 235,000 - 293,000 people) by 2040.</p>	<ul style="list-style-type: none"> ✓ The proposed development will provide high density residential development which will be available for both purchase and rental accommodation and will therefore facilitate an increase in the population of Dublin City. ✓ The proposed development will generate a population of approx. 948 occupants.
<p>11 - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</p>	<ul style="list-style-type: none"> ✓ This proposal seeks permission for a net density of 225 units/ha on a brownfield site which will generate an estimated population of approx. 745 people at a central accessible location that is close to major employment centres and high capacity / high frequency public transport services (see Transport & Traffic Assessment). ✓ The development includes 733 sq.m of retail/commercial development which will generate employment locally. ✓ The additional population will lead to strengthening of jobs and economic activity within the area through the knock-on effect on services and facilities within the existing urban area and therefore satisfies objective 11.
<p>13 - In urban areas, planning and related standards, including building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and</p>	<ul style="list-style-type: none"> ✓ The proposed development ranges in height from 2 storeys to 7 storeys and this is compliant with the City Development Plan. The Landscape & Visual Impact Assessment and photomontages demonstrate that the scale of the proposed development is appropriate to the site's context. ✓ The daylight and sunlight availability assessment confirms that the proposed height maintains the amenity of adjoining land uses, existing and permitted. ✓ The proposed car parking ratio of 0.26 spaces per unit is below the max. standard of 1 space per unit as set out in Chapter 16 of the DCCDP. A full justification for this reduction is set out in the Traffic & Transport Assessment prepared by Systra submitted under separate cover. Reducing parking at this inner-city site is appropriate having regard to the climate

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the environment is suitably protected.	change agenda and the need to improve air quality.
26 - Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy.	<ul style="list-style-type: none"> ✓ The site is within a central urban location and is accessible to a wide range of employment opportunities in the city centre and surrounding suburbs, including the adjacent Coombe Hospital and St James’s Hospital 15 minutes’ walk away. Approximately 948 people will be accommodated at the site and will benefit from being within walking distance of public transport, local retail and recreational facilities, education and employment opportunities. ✓ The scheme includes plentiful opportunities for active recreation. ✓ Secure bicycle parking is provided for residents - 468 long-stay spaces and 172 short-stay cycle spaces.
27 - Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.	<ul style="list-style-type: none"> ✓ The proposed development is located at a central urban site that enjoys high levels of connectivity and will generate increased pedestrian and cycling activity. The result will be safer streets and open areas with increased passive surveillance providing a deterrent to anti-social behaviour. ✓ The open space includes a multi use formal sports pitch with an outdoor gym area to the north of it. The scale of the public park would facilitate physical activity workshops e.g. yoga to occur. ✓ Secure bicycle parking is provided for future occupants and will promote active modes of travel. ✓ A Mobility Manager will be appointed to ensure ongoing promotion and marketing of sustainable travel options to the residents of the development. ✓ 14 car parking spaces will be reserved for car sharing. ✓ Permeability is central to the design and the network of streets will ensure connectivity across SDRA 12, facilitating north-south and east-west movement.
28 - Plan for a more diverse and socially	<ul style="list-style-type: none"> ✓ The proposed development will deliver mixed tenure housing supporting homeowners renters and social and affordable occupants.

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<p>inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.</p>	<p>✓ The scheme is designed to Part M (Building Regulation) standards meaning that all areas are accessible regardless of age and or ability.</p>
<p>31 - Prioritise the alignment of targeted and planned population and employment growth with investment in:</p> <p>The provision of early childhood care and education (ECCE) facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations.</p>	<p>✓ This application is accompanied by a Childcare Demand Report, it concludes that there is currently under provision of childcare facilities within the study area as outlined in the report. The proposed development incorporates a childcare facility with a gross floor area of 347 sq.m and will thus provide for the maximum childcare needs generated by the scheme as well as providing a service for the wider catchment. It is estimated that the creche would facilitate 60 childcare spaces.</p>
<p>32 - Target the delivery of 550,000 additional households up to 2040.</p>	<p>✓ The proposed development will contribute 345 new homes to this target.</p>
<p>33 - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</p>	<p>✓ This is an inner-city site with access to high frequency and capacity public transport. Proximate to the site there are opportunities for education, employment, and play. The ability for the area to absorb the proposed development without adverse effect is demonstrated in this application.</p>
<p>34 - Support the provision of lifetime adaptable homes that can accommodate the</p>	<p>✓ The proposed development is designed with a Universal Design Approach i.e. so that it can be readily accessed and used by everyone, regardless of age, size, ability or disability. The</p>

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changing needs of a household over time.	<p>proposed development is Part M (Building Regulations) compliant.</p> <ul style="list-style-type: none"> ✓ Flexibility is built into the design and the architectural design statement demonstrates how various units can be enlarged to accommodate changing needs.
35 - Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.	<ul style="list-style-type: none"> ✓ The proposed development is an infill and regeneration site. While the scale of the building's contrasts with the traditional built environment, it is consistent with emerging development and 7 storeys is compliant with the Development Plan's height strategy as set out in Chapter 16. The building height is deemed modest in nature and the max. height is concentrated away from the site boundaries. The design is sensitive to its context and achieves high density development of 225uph.
52 - The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.	<ul style="list-style-type: none"> ✓ The buildings are designed to achieve an A2/A3 BER. ✓ The car parking strategy responds to climate change and air quality issues. ✓ The street network would facilitate greater connectivity in this area thereby promoting active travel modes, cycling, and walking. ✓ This submission is accompanied by an EIAR that demonstrates post-mitigation the residual impact of the proposed development is not significant. ✓ Irish Water has confirmed the feasibility of the scheme in terms of water supply and foul water discharge. ✓ The landscape design incorporates SuDS and biodiversity measures.
75 - Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.	<ul style="list-style-type: none"> ✓ The proposed development is designed to a BREEAM rating of Excellent meaning that the buildings will have a very high energy performance. ✓ The drainage system includes an allowance for climate change and SuDS in the form of green roofs, blue roofs, petrol interceptors, attenuation and flow controls are integrated into the design.

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	<ul style="list-style-type: none"> ✓ The proposed development has been planned to promote active modes of travel and reduce car dependence.
<p>56 - Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.</p>	<ul style="list-style-type: none"> ✓ During the demolition & construction stage, every opportunity to minimise waste production including reuse and recycling of materials will be embraced. A Construction Demolition and Waste Management Plan is submitted with this application under separate cover. ✓ The proposed development will incorporate adequately sized waste management facilities within the basement that will promote source segregation of waste streams i.e. organics, recyclable and residual waste.
<p>57 - Enhance water quality and resource management by: Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.</p>	<ul style="list-style-type: none"> ✓ Bailey Gibson is within Flood Zone C and housing; a vulnerable use is appropriate and in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authority Guidelines on this matter. ✓ A small portion of the site is in Flood Zone A and the use at this location is the sports pitch, this is a water compatible use and complies with applicable Guidelines.
<p>60 - Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.</p>	<ul style="list-style-type: none"> ✓ The existing industrial buildings on site are proposed to be demolished. These buildings are not protected structures and are not identified as having any statutory significance. ✓ The Built Heritage chapter of the EIAR identifies that one building on the site, Block D, contains some elements of interest and a salvage list is included.
<p>63 - Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water</p>	<ul style="list-style-type: none"> ✓ Sustainable urban drainage system (SuDS) measures are incorporated as appropriate into the proposed design.

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resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.	
64 - Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.	<ul style="list-style-type: none"> ✓ Given the site's accessible location, a reduced level of car parking provision for residents is proposed. This will serve to promote a modal shift in transport and a reduction in emissions. ✓ Secure bicycle parking is provided to encourage active travel. ✓ The proposed development is designed to have a BREEAM rating of excellent and will achieve a high level of energy efficiency through minimising the use of fossil fuels and associated emissions to air.
75 - Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	<ul style="list-style-type: none"> ✓ An Environmental Impact Assessment Report and Appropriate Assessment Screening Report accompany this application which are submitted under separate cover.

3.2 Sustainable Urban Housing: Design Standards for New Apartments (2018, updated 2020)

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

- Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m) of significant employment opportunities, including hospitals. The site is situated adjacent to the Coombe Hospital and within 17 minutes' walk of St James's Hospital.
- Sites within reasonable distance (i.e. up to 10 minutes or 800-1,000m) to/from high-capacity urban public transport stops, including light rail. Fatima LUAS stop is 800m to the north-west, less than 10 minutes' walk from the site.
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10-minute peak hour frequency) urban bus services. The South Clondalkin QBC extending along Cork Street and Dolphin's Barn Street is situated to the west (less than 5 minute walk).

The design criteria for apartments are contained within the main body of the Guidelines and in Appendix 1. Quantitative standards for inter alia, unit size, internal space standards, dual-aspect ratios and amenity spaces are also set out within these Guidelines. The scheme is designed in compliance with the standards and the **Housing Quality Audit** prepared by HJL Architects and submitted under separate cover confirms this.

The proposed development is mixed tenure comprising 85% Build to Rent (BtR) and 15% Build to Sell (BtS). The Guidelines include specific planning policy requirements (SPPRs) for BtR developments, SPPR 7 and 8.

SPPR 8(i) identifies that there will be no restriction on dwelling mix for BtR developments and accordingly SPPR 1 can be disregarded in the context of the mix for 292 of the total 345 units.

Specific Planning Policy Requirement 1

Apartment 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).

The scheme includes 49 BtS apartments in block BG3 and the mix is;

- 31% (15 no.) 1 bedroom units
- 69% (34 no.) 2 bedroom units

The proposed mix complies with **SPPR 1** requirements.

SPPR 2 does not apply to this proposed development as it provides that

“For schemes of 50 or more units, SPPR 1 shall apply to the entire development.”

SPPR 3 establishes the minimum apartment floor areas as follows;

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

The minimum floor areas have been met within all individual units and the majority of the units exceed the minimum floor area, refer to Housing Quality Audit.

Para. 3.8 of the Guidelines detail that it is a requirement that:

a) The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%)

b) Build-To-Rent developments are excepted from this requirement (see SPPR 8 below) as such developments are required to provide compensatory communal facilities and amenities for use by residents

Having regard to part a) and b) the requirement for the majority of all apartments to exceed the minimum floor area by a minimum of 10% does not apply to the proposed 292 BtR units as it is set out in SPPR 8(iv) of the Apartment Guidelines that this does not apply to BtR units.

It is confirmed in the **Housing Quality Audit** that all the 49 BtS units achieve this requirement for 10% of all apartments to exceed the minimum floor areas by a minimum of 10%.

SPPR 4 requires that a minimum of 33% of dual aspect units is required in central and accessible urban locations. Given the sites proximity to the city centre, being an inner-city urban location, SPPR 4 applies. 142 (42%) of the 341 apartments are dual aspect and the requirement of SPPR 4 is met and exceeded.

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

SPPR 6 limits the number of apartments per core to 12 no. per floor. It is noted that this does not apply to BtR blocks as SPPR 8 (iv) states;

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

Block BG3, is BtS and it has 14 units per floor with 2 cores, see **Housing Quality Audit** prepared by HJL Architects submitted under separate cover.

Private Amenity Space

In relation to private amenity space, it is a requirement to provide apartments with private open space in the form of gardens and patios and balconies in accordance with the standards below. Balconies should adjoin and have a functional relationship with the main living areas of the apartments, and they should have a min. depth 1.5 metres. All balconies are designed to prevent falls.

Minimum floor areas for private amenity space

Studio	4 sq m
One bedroom	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

Table 2 Minimum Floor Areas for Private Amenity Space (Extract from Appendix 1)

In Build-to-Rent schemes, SPPR 8(ii) states that there is flexibility in the approach to the proportion and provision of private amenity space.

Notwithstanding this flexibility, all of the proposed units (BtR and BtS) incorporate private amenity spaces that meet and in instances exceed the minimum standards and the balconies are accessed from the main living area. The detail is set out in the Housing Quality Audit.

Communal Amenity Space

The minimum floor areas for communal amenity space replicate private amenity space as set out above.

SPPR 8 (ii) provides for flexibility at the discretion of the planning authority in relation to all of the communal amenity space for BtR development. This is because there is a requirement for BtR developments to provide resident services, facilities and amenities under SPPR 7(b).

Notwithstanding the tenure, the proposed development includes communal open space for all 4 apartment blocks BG1 - BG 4 in the form of courtyards and a podium garden. The quantity meets the min. standards for communal amenity space.

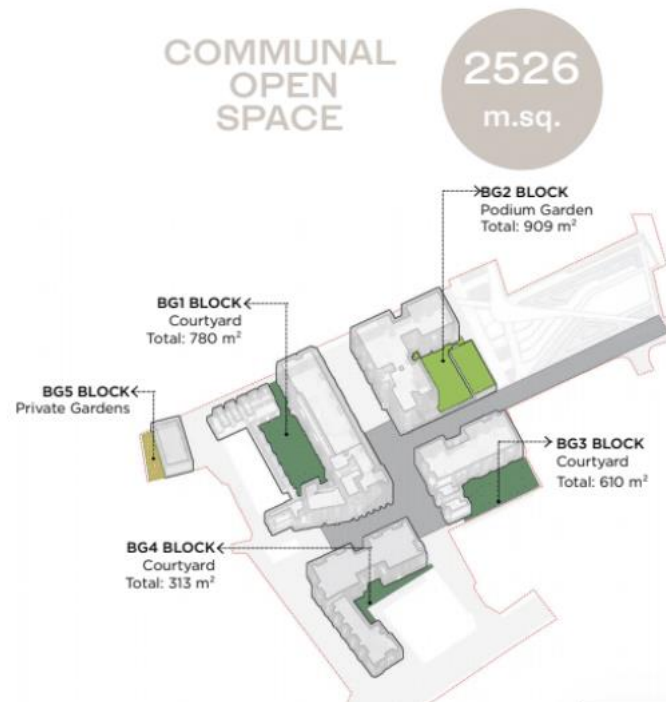


Figure 2 Distribution of Communal Amenity Areas (Extract from Urban and Architectural Design Statement)

Block	Communal Amenity Space Required	Communal Open Space Provided
BG1	776 sq.m	775 sq.m
BG2	535 sq.m	909 sq.m
BG3	289 sq.m	527 sq.m
BG4	313 sq.m	313 sq.m
Total	1,913 sq.m	2,524 sq.m

Table 3 Communal open Space Provision with Blocks B1-BG4

The communal open space areas are designed to provide resident amenity spaces that will provide opportunities for recreation and social integration children’s play and biodiversity enhancement. The orientation of the communal open spaces within the courtyards optimises sunlight availability making pleasant spaces. This is proven in the Daylight and Sunlight Availability Assessment, which confirms that 100% of the proposed amenity spaces meet the BR 209 (2022).

Internal Storage

Regarding Internal Storage, minimum requirements are established in Appendix 1 and SPPR 8(ii) states that flexibility can be applied for a proportion

of the requirement in BtR units. Similar to the above this flexibility is at the discretion of the planning authority.

Minimum storage space requirements

Studio	3 sq m
One bedroom	3 sq m
Two bedrooms (3 person)	5 sq m
Two bedrooms (4 person)	6 sq m
Three or more bedrooms	9 sq m

Table 4 Minimum Storage Requirements (Extract from Appendix 1)

The proposed scheme is fully compliant with the minimum storage areas and as such the flexibility afforded in the Apartment Guidelines is not sought. Please refer to Housing Quality Audit.

Refuse Storage

Refuse storage provision is a requirement of Section 4.8 of the Guidelines that apartment schemes and must be accessible to each stair core and designed with regard to the projected waste generation, types and quantities. Within apartments there must be sufficient provision for temporary storage of segregated materials prior to deposition in communal facilities. As outlined above, the scheme provides adequate storage within individual apartments in excess of that required for BTR schemes and communal waste storage is provided at basement level.

An Operational Waste Management Report is included with this application. It uses EPA waste statistics for household waste generation to calculate the waste that would be generated by the proposed fully occupied development.

The design of the proposed 4 basement communal bin storage areas is informed by this analysis and full provision is made for the 3-bin system.

Children’s Play

The Guidelines (Section 4.13) state Children’s play needs around the apartment building should be catered for:

- *within the private open space associated with individual apartments (see chapter 3);*

The balconies are partially recessed which has a number of benefits for children’s play, the recess creates a more protected area that facilitates it use in less clement weather and protects privacy. Glass and metal rail balconies are used throughout the scheme and provide safety.

- *within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and*

- *within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.*

The communal open spaces associated with each block integrate informal play areas. All areas for play are overlooked to ensure that the safety of children is prioritised.

Bicycle Parking & Storage

Section 4.17 of the Apartment Guidelines states: *Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.*

468 long-stay (residents) bicycle parking spaces are proposed for a total of 341 units. This is a ratio of 1.37 bicycle spaces per unit. While this quantity does not meet the general minimum standard in the Guidelines it does exceed the DCC standard of 1 cycle parking space per unit.

The Traffic & Transport Assessment and Mobility Management Plan identifies that the target cycle mode share for the development is 15% which based on an estimated future population of approximately 948 based on a 2.75 person per unit average equates to a need for 142 bikes for commuting purposes.

It is recognised that additional spaces will be needed for bike storage and leisure use and an additional 326 long stay spaces have been provided. The provision of cycle parking will continue to be reviewed as part of an occupational Mobility Management Plan and the potential provision of additional cycle parking will be reviewed should the demand arise.

With respect to the location the guidelines advise that *cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road avoiding unnecessarily long access routes with poor passive security or, slopes that can become hazardous in winter weather.*

207 spaces are proposed at basement level for residents of BG2 and BG3. They will be accessed via a dedicated cycle stairway and a bike lift. Provision is made for 4 cargo bike spaces at podium level for resident use. The scheme includes 2 bike sheds with 177 spaces in a building adjacent to BG1 and 83 spaces within the ground floor of BG4. The design and location of the bike parking areas is cognisant of the need to make journeys as convenient as possible so as to encourage a modal shift. Similarly, these areas will be well lit to promote safety when accessing the areas.

Car Parking

As outlined earlier the proposed development satisfies the criteria for central and/or accessible urban location.

Para. 4.19 of the Guidelines states;

"In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity."

Having regard to the scheme's mixed tenure, SPPR 8(iii) is relevant to the BtR element.

SPPR 8 (iii) *There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.*

A parking ratio of 0.26 car spaces per unit is proposed for the development. This is derived from extensive analysis undertaken by Systra and presented in the Traffic and Transport Assessment. The analysis considered the site location, availability of alternative modes, proposed on-site mobility services, baseline levels of existing car ownership, and national and international guidance.

Though it is the objective of the parking and mobility strategy to limit the need for car usage of residents and visitors alike, 15 visitor car spaces (incl. 4 spaces reserved for car-sharing) will be provided on street to ensure adequate parking is provided for visitors and negate any overspill onto the surrounding street. The total number of visitor spaces has been maximised whilst maintaining a quality public realm. A further 3 additional spaces will be provided for creche, and taxi set down and 1 loading bay is proposed. Additional street parking (total of 35 no. visitor spaces) will be provided in the north-eastern part of the site to serve the Multi-Sport Playing Pitch, together with a coach/car set-down area to be provided on Donore Avenue.

SPPR 7(a) states that BTR development must be:

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

It is confirmed that the public notices identify that the proposed development is a mixed tenure scheme comprising part Build to Rent and part Build to Sell apartments.

The application is also accompanied by a proposed covenant from the Applicant satisfying SPPR7(a).

SPPR 7(b) requires applications to be accompanied by detailed proposals for supporting communal and recreational amenities, the facilities are categorised as (i) Resident Support Facilities and (ii) Resident Services & Amenities.

The proposed development includes 733 sq.m of support facilities services and amenities that provide a diversity of uses including a gymnasium, co-working space, entertainment areas and a concierge office. The accompanying Architectural Design Statement should be referenced for full details. Centralised waste management is at basement level. Laundry services are not included as there is sufficient area within individual apartments to accommodate this.

Part V

The Guidelines confirm that Part V of the Planning and Development Act 2000 (as amended) requirements are applicable to BtR developments, and accordingly 34 no. social housing units are proposed. See Part V proposal included under separate cover which also includes evidence of the timeline of the transaction of the Bailey Gibson site to demonstrate that 10% is the applicable requirement.

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

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

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

SPPR 1 states;

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

The Dublin City Development Plan 2016-2022 identifies SDRA 12 – St Teresa’s Gardens as an appropriate location for one or two mid-rise buildings up to 50m. It is noted that this allocation has been used in the extant permission on the adjacent Player Wills site.

The proposed buildings range in height from two storeys to seven storeys, with all blocks below 24m in height. This is fully compliant with the City Development Plan.

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

Policy Objective & Provision	Statement of Consistency
<p>1 - Does the proposal positively assist in securing National Planning Framework objectives of focussing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in</p>	<p>✓ The site is currently vacant and activating it for the delivery of a high-density residential scheme and achieving effective consolidation is consistent with the National Policy Objectives of the NPF to achieve a targeted pattern of growth, specifically;</p>

Policy Objective & Provision	Statement of Consistency
<p>particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres.</p>	<ul style="list-style-type: none"> ✓ NPO 3a - <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;</i> and ✓ NPO 3b - <i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i>
<p>2 - Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?</p>	<ul style="list-style-type: none"> ✓ The proposed development includes buildings ranging in height from 2-7 storeys. The site is situated within SDRA 12 – St Teresa’s Gardens, identified in the City Development Plan as an appropriate location for one or two mid-rise buildings up to 50m. As outlined above this allocation is used in the extant Player Wills permission. The inference from the 50m reference in the guiding principles section for SDRA 12 is that all other buildings should be low rise i.e. 24m and below. It is confirmed that the proposed blocks meet this threshold. ✓ The Dublin City Development Plan 2016-2022 predates the publication of these guidelines and accordingly does not take account of Chapter 2.

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

Notwithstanding the proposed development’s compliance with the height strategy in the Development Plan, the proposed development is assessed against the criteria in the section below.

Criterion	Element	Statement of Consistency
<p>City/Town</p>	<p>Public transport Integration with and enhancement of area –</p>	<ul style="list-style-type: none"> ✓ The site benefits from high levels of accessibility to public transport including high-capacity LUAS services and high frequency Dublin Bus services. Please refer to the Traffic and

Criterion	Element	Statement of Consistency
	<p>Landscape & Visual Assessment (LVIA)</p> <p>Positive contribution to place-making</p>	<p>Transport Assessment prepared by Systra for further information.</p> <ul style="list-style-type: none"> ✓ Chapter 5 – Landscape and Visual Impact together with a suite of photomontages accompanies this submission. Post development, the impact is predicted to range from slight to moderate and neutral. ✓ The development will fill a large gap in the existing townscape, reducing the disconnect between the surrounding areas, and establishing a new urban quarter with a distinct identity. In so doing it would enhance its immediate environs through changes to views, introducing a new and attractive built element to the view compositions, indicating a new place of significance in the townscape).
<p>District/ Neighbourhood/ Street</p>	<p>Responds to overall natural and built environment</p> <p>Enhances urban design context</p> <p>Cognisant of flood risk</p> <p>Improvements to legibility</p> <p>Positively contribute to mix of uses & dwelling types</p>	<ul style="list-style-type: none"> ✓ The proposed development will bring a brownfield, vacant site into productive use and will regenerate this area of the city through the introduction of a vibrant urban quarter that will improve the public realm and permeability and provide for a significant public park, Player’s Park, which will serve both future occupants and the surrounding population. ✓ The uses as proposed are acceptable in the context of the Flood Risk Management Guidelines and this is confirmed in the project engineers reports. ✓ A key element of the layout is permeability which will benefit the wider community through the creation of new pedestrian accessways, including one

Criterion	Element	Statement of Consistency
		<p>pedestrian access via Rehoboth Place which will also provide connections to South Circular Road to the south.</p> <ul style="list-style-type: none"> ✓ The proposed development is for a mix of apartments sizes which will be available for both rent (85% of total no. units) and sale/purchase (15% of total no. units) that will augment the existing housing stock that comprises a significant quantity of traditional housing, see Unit Mix Justification Report. ✓ Non residential uses include a creche and floor space capable of supporting neighbour scale daily living needs e.g. shop, financial services etc. A restaurant/café/bar is also proposed.
<p>District/ Neighbourhood/ Street</p>	<p>Maximise access to daylight, ventilation & views and minimise overshadowing & loss of light.</p>	<ul style="list-style-type: none"> ✓ A Daylight and Sunlight Availability Assessment accompanies this application under separate cover and demonstrates that 73% of the units meet the minimum recommendation for Exposure to Sunlight . ✓ The assessment also demonstrates that 100% of the proposed amenity spaces meet the BR 209 (2022) recommendation for direct sunlight.
<p>Specific Assessments</p>	<p>Micro-climatic effects Birds/Bats Telecommunications Safe Air Navigation</p>	<ul style="list-style-type: none"> ✓ A micro-climatic assessment is submitted with this application under separate cover. ✓ An EIAR and LVIA is submitted under separate cover and conclude that post mitigation the proposed development will not give rise to likely significant environmental effects.

Criterion	Element	Statement of Consistency
	Urban Design Statement EIA AA	<ul style="list-style-type: none"> ✓ The Biodiversity chapter of the EIAR considers birds/bats. ✓ A telecommunications report is included. ✓ An Urban and Architectural Design Statement prepared by HJL architects is included. The Landscape Design Statement is also relevant. ✓ The AA Screening concludes that the Bailey Gibson site, individually or in combination with another plan or project, will not have a significant effect on any European sites

SPPR 3 states;

“It is a specific planning policy requirement that where;

A;

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

This application is accompanied by a suite of supporting information that fulfil the obligations of the Applicant for the development management process. The reports demonstrate that the proposed development is appropriate and will not give rise to significant impacts and complies with the guidelines on Build to Rent as included in the Apartment Guidelines (2020), as set out under Section 3.2.

This application is accompanied by a suite of supporting information that fulfil the obligations of the Applicant for the development management process. The reports demonstrate that the proposed development is appropriate and will not give rise to significant impacts. Finally, the Guidelines acknowledge that fire safety requirements are a separate regulatory requirement. Nonetheless, developers are encouraged to engage in this process at an early stage. In this regard, the proposed design has been reviewed by a Fire Consultant and comments received are integrated to the design.

3.4 Housing for All – A New Housing Plan for Ireland (2021)

‘Housing for All – A new Housing Plan for Ireland’ (2021) was published in September 2021 which aims to address some of the key issues surrounding housing, namely cost and supply. The Plan targets State investment of €20 billion and the provision of an additional 300,000 housing units by 2030. The Plan sets out four pathways to achieving these targets, three of which are relevant to the proposed development and are addressed below. As this is a new build development, Pathway 4 - *Addressing Vacancy & Efficient Use of Existing Stock* does not apply.

Pathway	Relevant Aims / Targets / Policies	Statement of Consistency
<p>Pathway 1: Pathway to Supporting Home Ownership & Increasing Affordability.</p>	<p>Housing Policy Objective (HPO) 1 – Enable Homeownership and Increase Affordability</p> <p>1.1 - Provide an average of 6,000 affordable homes each year.</p> <p>1.8 - Expand Part V requirements to increase the percentage contribution from 10% to 20% and apply to affordable as well as social housing.</p> <p>1.9 - Ensure consistency in the application of new arrangements under Part V by Local Authorities.</p>	<ul style="list-style-type: none"> ✓ Social and affordable accommodation will form part of the proposed scheme. ✓ The new 20% Part V contribution does not apply in this instance as the Applicant acquired the lands in the period between September 2015 and July 2021, for which the 10% contribution still applies. ✓ The proposed development will provide 10% social housing units in line with legislative requirements. The development will therefore contribute 34 no. units towards the delivery of social housing units as set out under Pathway 1.
<p>Pathway 2: Pathway to Eradicating Homelessness, Increasing Social</p>	<p>HPO 3 – Work towards Ending Homelessness by 2030</p> <p>3.4 – Target 1,200 new <i>Housing First</i> tenancies from 2022 to 2026.</p>	<ul style="list-style-type: none"> ✓ As outlined, the development will contribute 34 no. units towards the delivery of social housing units, which will contribute to the appointed

Pathway	Relevant Aims / Targets / Policies	Statement of Consistency
<p>Housing Delivery and Supporting Social Inclusion</p>	<p>3.5 – <i>Housing First</i> will be underpinned by the delivery of additional one-bed social housing homes.</p> <p>HPO 4 – Increase Social housing delivery.</p> <p>4.1 – Deliver over 10,000 social housing homes each year to 2030 and increase the stock of available social housing</p> <p>4.4 - End long-term leasing of social housing by Local Authorities and AHBs through phasing out new entrants and focussing on new-build to provide social homes.</p> <p>HPO 6 – Increase and improve housing options for Older People.</p> <p>6.1 – Continue to support the development of the Age Friendly Homes portal and website, which promotes awareness of age friendly housing.</p> <p>HPO 7 – Increase and improve housing options and supports for people with a disability.</p>	<p>target under HPO 4.1 for the delivery of 10,000 social housing homes each year to 2030.</p> <ul style="list-style-type: none"> ✓ Of these units, 25 no. units are proposed to be studio and one-bedroom units which will contribution to the delivery of additional one-bedroom social housing homes in line with HPOs 3.4. and 3.5 and help facilitate the implementation of the <i>Housing First</i> scheme. ✓ The contribution of new-build social housing homes will help to reduce the reliance of Local Authorities on the long-term leasing of social housing in line with Objective 4.4. ✓ The scheme is designed incorporating the principles of universal access and to the standards of Part M of the Building Regulations. ✓ The proposed development is designed with a Universal Design Approach i.e. so that it can be readily accessed and used by everyone, regardless of age, size, ability or disability.

Pathway	Relevant Aims / Targets / Policies	Statement of Consistency
<p>Pathway 3: Pathway to Increasing New Housing Supply</p>	<p>HPO 12 - Deliver a new approach to active land management</p> <p>12.2 - Develop proposals for new Urban Development Zones, to deliver a coordinated and transparent approach to the delivery of residential and urban development particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.</p>	<ul style="list-style-type: none"> ✓ The site is currently vacant and activating it for the delivery of a high-density residential scheme and achieving effective consolidation is consistent with the National Policy Objectives of the NPF to achieve a targeted pattern of growth, specifically; ✓ NPO 3a - <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements;</i> and ✓ NPO 3b - <i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i>

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

The Plan sets out five pillars to achieving the target of the *ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation, especially those families in emergency accommodation*. Three of which are relevant to the proposed development and are addressed below. As this is a new build, Build to Rent and Build to Sell development, Pillar 1 and Pillar 5 does not apply.

Aspect & Key Objective	Policy Provision	Statement of Consistency
<p>Pillar 2: Accelerate Social Housing - Increase the level and speed of delivery of social housing and other State supported housing</p>	<p>Key actions: 47,000 social housing units delivered by 2021, supported by investment of €5.35 billion Mixed-Tenure Development on State Lands and other lands</p>	<p>✓ The proposed development provides 10% social housing units in line with legislative requirements. The development will therefore contribute 34 no. units towards the delivery of social housing units as set within Pillar 2 of the Action Plan.</p>
<p>Pillar 3: Build More Homes - Increase the output of private housing to meet demand at affordable prices</p>	<p>Key actions: Doubling of output to deliver over 25,000 units per annum on average over the period of the Plan (2017-2021)</p>	<p>✓ The proposed development will provide 345 no. residential units and will therefore contribute towards this target.</p>
<p>Pillar 4: Improve the Rental Sector -</p>	<p>Key actions: Encourage “build to rent”</p>	<p>✓ The proposed development is a part BtR scheme, designed to high standards and will support greater choice for tenants in the rental market.</p>

3.6 Sustainable Residential Development in Urban Areas (2009)

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
<p>Chapter 3 The Role of Design</p>	<p>Have designers carried out a site appraisal prior to preparing a layout? Is the standard of design of a</p>	<p>✓ The layout is informed by a site appraisal carried out by the architect, landscape design team, engineers and specialists involved in preparing the EIAR</p>

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	sufficiently high standard?	<p>submitted under separate cover.</p> <ul style="list-style-type: none"> ✓ The supporting documentation that accompanies this report demonstrates that the proposed scheme meets relevant performance-based criteria and as such is of a high standard of design. ✓ It is intended to improve existing connections with the surrounding street network, particularly at Rehoboth Place. The redevelopment will also facilitate new connections with the adjoining SDRA 12 Lands. ✓ Pedestrian and cyclist movements are prioritised through a series of shared internal streets that are designed to reduced vehicle speed therefore prioritising pedestrians.
	Does the design of residential streets strike the right balance between the different functions of the street, including a sense of place?	
<p>Chapter 4 Planning for Sustainable Neighbourhoods</p>	Are lands in accordance with sequencing priorities of development plan or local area plan?	<ul style="list-style-type: none"> ✓ The site is a priority site in terms of the National Planning Framework objective of urban densification, consolidation and re-use of existing brownfield sites. ✓ The development site is a SDRA and it is a key site for the development plan's core strategy implementation. ✓ The Social Infrastructure Audit (SIA) accompanying this submission concludes
	Assessment of the capacity of existing schools.	
	Input of other necessary agencies into the plan/development proposal?	

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<p data-bbox="710 358 941 504">Is there an appropriate range of community and support facilities?</p> <p data-bbox="710 1097 941 1355">For higher density schemes, is there adequate existing public transport, or will it be provided in tandem with development.</p>	<p data-bbox="1029 358 1380 750">that the area is well served by primary and post primary schools and has 4 no. third level colleges within close proximity. In addition, provision has been made for the future expansion of St Catherine's National School within the permitted Player Wills site also within SDRA 12.</p> <ul style="list-style-type: none"> <li data-bbox="981 750 1380 1355">✓ The SHD process requires pre planning consultation with the relevant local authority in this case Dublin City Council. This has been fulfilled, see details in the accompanying Planning Statement. Individual works department representatives were present at the meeting and provided their opinion to An Bord Pleanála at the PAC stage. Irish Water have confirmed the feasibility of this proposal. <li data-bbox="981 1355 1380 1646">✓ The central and accessible location of this site, being at the edge of the city centre, ensures that residents will enjoy access to a range of leisure, retail, and community facilities, as detailed in the SIA. <li data-bbox="981 1646 1380 1825">✓ The proposed scheme is located in close proximity to high-capacity, high-frequency public transport services, Luas & Dublin Bus. <li data-bbox="981 1825 1380 1937">✓ The proposed development provides for a series of important public

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		open spaces, including a multi-sport playing pitch, St. Teresa’s Playground, St. Teresa’s Boulevard, Player’s Park (which incorporates an additional children’s play area), and Rehoboth Plaza positioned adjacent to BG1.
Will the development:		
	Prioritise public transport, cycling and walking, and dissuade the use of cars.	✓ Walking and cycling will be the dominant means of movement in the area and ease of access for pedestrians and cyclists is at the core of the design strategy.
	Ensure accessibility for everyone including people with disabilities.	✓ The car parking ratio proposed is 0.26 spaces per unit and this will promote a modal shift.
	Encourage more efficient use of energy and reduction in greenhouse gases.	✓ The scheme to the standards of Part M of the Building Regulations so accessible to people of all ages and ability.
	Include right quality and quantity of public open space.	✓ The scheme is designed to meet a A2/A3 BER. The low volume of carparking will also contribute to a reduction in emissions.
	Include measures for satisfactory standards of personal safety and traffic safety.	✓ The Housing Quality Audit that accompanies this application demonstrates that the scheme exceeds the communal open space requirement. There is over 2 hectares of public open space included designed for both active and passive use, play and catering for different age groups.
	Present an attractive and well-maintained appearance.	
	Promote social integration, provide for diverse range of	

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	household types, age groups and housing tenures.	<ul style="list-style-type: none"> ✓ Increased levels of pedestrian activity will be achieved by the inclusion of new pedestrian accessways in/out of the site and shared street spaces that prioritise pedestrians. Ground floor uses that promote activity and passive surveillance will result in a safer environment. ✓ The Architectural and Landscape Design Statement presents the detail of the scheme's materiality and confirms that it will be an attractive place to live and sympathetic to the character of surrounding residential dwellings. ✓ The mix of units proposed includes studio, 1, 2, and 3 bedrooms apartment and duplex units, and 4-bedroom townhouses. ✓ Social and affordable accommodation (34 units) will form part of the proposed scheme. ✓ The landscape proposals include features to enhance the biodiversity value of the site – native trees, pollinator planting. ✓ A comprehensive surface water drainage strategy with SuDS features is proposed, see Infrastructure Report.
	Protect and where possible enhance the built and natural heritage.	
	Provide for Sustainable Drainage Systems.	
Chapter 5	Are residential densities sufficiently	<ul style="list-style-type: none"> ✓ The proposed net density is 225 units per hectare. This

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
<p>Cities and Larger Towns</p>	<p>high in a location which are, or will be, served by public transport.</p>	<p>is appropriate given the site's location close to public transport and with immediate access to employment opportunities, in particular, the Coombe Hospital and St James' Hospital.</p> <p>✓ The Housing Quality Audit demonstrates that the scheme meets the qualitative requirements of a build to rent scheme. 42% of the units are dual aspect, this exceeds the required 33%. Other qualitative standards established in the Apartment Guidelines are all met. The daylight and sunlight availability assessment demonstrates that having regard to the characteristics of the site, the scheme performs well.</p> <p>✓ There is minimal overshadowing from the proposed Bailey Gibson development due to the considered architecture.</p> <p>✓ The scale of the buildings is stepped down at the site's edges to respect exiting adjoining land uses.</p>
	<p>Are higher densities accompanied by high qualitative standard of design and layout?</p>	
	<p>Does the design and location of new apartment blocks respect the amenities of existing adjacent housing in terms of sunlight and overlooking?</p>	
	<p>In order to maximise inner city and town centre population growth, there should, in principle, be no upper limit on the number of dwellings that may be provided within</p>	

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<p>any town or city centre site, subject to the following safeguards:</p>	<ul style="list-style-type: none"> ✓ The scheme provides good internal space standards compliant with the Apartment Guidelines; ✓ The scheme conforms with the development plan's guiding principles for SDRA 12 in relation to height or massing; ✓ The scheme complies with plot ratio and site coverage standards adopted in development plan.
<p>Chapter 7 The Home and Its Setting</p>	<p>In higher density developments, does quality of design and finish extend to individual dwellings and its immediate surroundings.</p>	<ul style="list-style-type: none"> ✓ The proposed residential development will be a high-quality energy efficient design. Finishes have been carefully considered to integrate with the established residential character of the surrounding development whilst creating a distinctive new urban neighbourhood with its own identity.
	<p>Decent levels of amenity, privacy, security and energy efficiency.</p>	
	<p>Will orientation of dwelling and internal layout maximise levels of daylight and sunlight?</p>	<ul style="list-style-type: none"> ✓ The buildings are NZEB compliant, provide for passive surveillance, includes a comprehensive landscaping scheme that meets established standards and provides occupants with a wide range of support services. ✓ 42% of the proposed units are dual aspect. The daylight/sunlight assessment confirms that 73% of the units meets the minimum recommendation for direct sunlight.
	<p>Has privacy been considered in design of the home.</p>	
	<p>Has the design sought to create child and pedestrian friendly car-free areas?</p>	
	<p>Has the design been influenced by</p>	

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<p>the principles of universal design?</p> <hr/> <p>Has adequate provision been made for the storage and collection of waste materials?</p>	<ul style="list-style-type: none"> ✓ The units are designed to avoid overlooking and all units will comply with the requirements of Part E in terms of noise insulation. The balconies are semi recessed promoting privacy. ✓ A reduced level of car parking (ratio of 0.26 per unit) is proposed. The design is focussed on prioritising pedestrians and promoting active modes of travel. ✓ The design complies with the requirements of Part M of the Building Regulations and principles of universal design. ✓ Dedicated 3 bin residential waste storage areas are included in the basement. The facilities management company in conjunction with the waste contractor will be responsible for conveying the bins to two separate waste pick-up points within the site for collection and emptying.

3.7 Design Manual for Urban Roads and Streets (2019)

Design Principles	Provisions	Statement of Consistency
<p>Integrated Street Networks</p>	<p>Does the development create connected centres that prioritise pedestrian</p>	<ul style="list-style-type: none"> ✓ The proposed development will significantly improve permeability at this site for the wider community, creating key connections through the site

Design Principles	Provisions	Statement of Consistency
	<p>movement and access to public transport?</p>	<p>at ground level to adjacent streets.</p> <ul style="list-style-type: none"> ✓ The proposed internal roads have been designed to integrate with the surrounding road network and the future network of streets in the wider SDRA 12 area. ✓ The internal road network will prioritise pedestrian movement and has been designed to promote vehicular traffic speeds of 30km/hr or less. ✓ The site is accessible to a range of public transport options.
<p>Movement and Place</p>	<p>Does the development create a legible street hierarchy that is appropriate to its context?</p> <p>Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e. community centre, shops, creche, schools etc.)?</p>	<ul style="list-style-type: none"> ✓ The proposed development will create a legible hierarchy of internal roads that responds to the site context and integrates with the surrounding street network. ✓ Pedestrian and cyclists will be accommodated at all primary and secondary access points but will also benefit from a dedicated pedestrian/cycle access point at Rehoboth Place. ✓ Vehicular traffic will be regulated through provision of separate ingress/egress points and has been designed to meet DMURS standards. 2 no. primary one-way entrance and exit vehicular accesses will be provided via South Circular Road, together with 1 no. secondary vehicular two-way access via Donore Avenue is proposed to serve the multi-sport playing pitch positioned in the north-eastern corner of

Design Principles	Provisions	Statement of Consistency
		<p>the site. As part of the future development of the wider SDRA 12 Lands, a further 1 no. additional primary vehicular access route via Donore Avenue to the east will be provided.</p>
<p>Permeability and Legibility</p>	<p>Has the street layout been well considered to maximise permeability for pedestrians and cyclists? Are the streets legible with maximum connection opportunities?</p>	<p>✓ The layout provides for safe and permeable pedestrian and cycle routes facilitating connection within the proposed development and to the local street network.</p>
<p>Management</p>	<p>Is the layout designed to self-regulate vehicle speeds and traffic congestion? Does the proposed layout minimise noise / air pollution wherever possible?</p>	<p>✓ The proposed internal street network will prioritise pedestrian and cyclist movement and be designed to self-regulate driver behaviour, encouraging speeds of 30km/hr or less. ✓ Design of the internal roads has been undertaken within the context of the wider SDRA 12 Framework Plan area and has been developed to discourage 'rat running' so congestion is unlikely to be an issue at this location. ✓ The provision of reduced car parking in this central and accessible location will promote a modal shift toward public transport and away from private car travel. ✓ All blocks are compliant with Part E of the Building Regulations and as such</p>

Design Principles	Provisions	Statement of Consistency
		<p>sound insulation measures are considered.</p> <ul style="list-style-type: none"> ✓ The emphasis on promoting a modal shift and use of renewable energy will assist with improving air quality.
<p>Movement, Place and Speed</p>	<p>Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed?</p> <p>Does the design promote a reasonable balance of both physical and psychological measures to regulate speed?</p>	<ul style="list-style-type: none"> ✓ Vehicle access within the scheme is restricted and accordingly speed is not a consideration.
<p>Streetscape</p>	<p>Does the scheme create an appropriate sense of enclosure in addition to a strong urban / suburban structure?</p> <p>Have street trees and areas of planting been provided where appropriate?</p> <p>Have active street edges been provided where appropriate?</p>	<ul style="list-style-type: none"> ✓ A perimeter block system predominantly ranging from three to five storeys, with some higher elements towards the centre (six and seven) which will create an appropriate sense of enclosure and enhance the urban structure within the site. The lower blocks of three storeys are concentrated along the site's boundaries where it adjoins existing low-rise dwellings ensuring the development responds sensitively to the established residential neighbourhood. ✓ The proposed scheme incorporates a comprehensive

Design Principles	Provisions	Statement of Consistency
	<p>Is a palette of high-quality surface materials and finishes provided?</p>	<p>landscape plan that is carefully considered to provide a high-quality response to the redevelopment of this site and has regard to the hierarchy of open spaces proposed within the SDRA 12 Lands, and the biodiversity value of the site.</p> <ul style="list-style-type: none"> ✓ Each block benefits from ground floor units with own door access to ensure that the internal streets are activated. This will be enhanced by the provision of neighbourhood level retail uses at street level. ✓ Façades for each building will utilise a mix of bricks consistent with the materiality prevalent in the Dublin 8 area. The use of brick as the predominant material alongside rendered façades in the courtyards that incorporate glass balustrades and aluminium, and coloured accents will ensure a low maintenance and durable response to the local context.
<p>Pedestrian and Cyclist Environment</p>	<p>Are footways of appropriate width provided so as to ensure pedestrian safety?</p> <p>Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations?</p> <p>Are shared surfaces located appropriately in</p>	<ul style="list-style-type: none"> ✓ All footpaths within the development site will exceed minimum requirements. ✓ All pedestrian crossings have been designed as per DMURS and the DCC taking in charge specification. Appropriate tactile paving has been provided at all crossing points. Crossing points reflect the desire lines for both cyclists and pedestrians. ✓ All public realm / shared surfaces have been designed as per DMURS and the DCC taking in charge specification.

Design Principles	Provisions	Statement of Consistency
	<p>areas where an extension of the pedestrian domain is required?</p> <p>Have cycle facilities been factored into the design?</p>	<p>Appropriate tactile paving has been provided to warn both cyclists and pedestrians of these shared spaces.</p> <p>✓ A dedicated cycle stairway is to be provided to the basement carpark.</p>
<p>Carriageway Conditions</p>	<p>Are vehicular carriageways sized appropriately for their function / location?</p> <p>Are surface materials appropriate to their application in order to inform drivers of the expected driving conditions?</p> <p>Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists?</p> <p>Have adequate parking / loading areas been provided?</p>	<p>✓ Internal roads and carriageways have been designed to reduce vehicular speed and prioritise pedestrian and cyclist movements. Internal roads as proposed have been designed in accordance with DMURS requirements.</p> <p>✓ The two main internal junctions will form a raised shared surface which will ultimately connect to a future new road to the east linking DCC lands & the former Player Wills site as proposed in the Development Framework for St. Theresa's Gardens and Environs (2017). This area will have flush or low kerbing with tactile and contrasting paving marking the edge of the footpath and start of the road carriageway to allow for visually impaired pedestrians to navigate the space.</p> <p>✓ All surface materials have been specified as per the requirements of DMURS and the DCC taking in charge specification.</p> <p>✓ The internal road network has also been designed to accommodate circulation of</p>

Design Principles	Provisions	Statement of Consistency
		refuse vehicles and emergency vehicles.

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

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

Criteria no. & Aspect	Provisions	Statement of Consistency
<p>1. Context</p> <p>How does the development respond to its surroundings?</p>	<ul style="list-style-type: none"> - The development seems to have evolved naturally as part of its surroundings. - Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users. - Form, architecture, and landscaping have been informed by the development's place and time. - The development positively contributes to the character and identity of the neighbourhood. - Appropriate responses are 	<ul style="list-style-type: none"> ✓ The scale of the development responds to the local surrounding scale. This is achieved through the tiering down of scale to the site perimeters to provide an appropriate relationship with existing development. At the same time, the site offers an excellent opportunity for increased densities to make an important contribution to the shortfall in the housing market and as such the opportunity for increased densities is responded to through the provision of taller buildings more centrally within the site. ✓ The Daylight and Sunlight Availability Assessment demonstrates that the scale and height of the proposed development

Criteria no. & Aspect	Provisions	Statement of Consistency
	<p>made to the nature of specific boundary conditions.</p>	<p>does not have any significant negative impact on the internal or external environment in terms of overshadowing or daylight/sunlight impact.</p> <ul style="list-style-type: none"> ✓ The architectural form responds to the site context. A palette of materials leaning heavily on brick ensures compatibility with the surrounding context. The form of buildings, particularly around the site perimeters, addresses existing scale. The design of the public realm and landscaping ensures integration with the existing environment. In particular, improvements to Rehoboth Place, including its widening, represent a planning benefit of the scheme. The improved Rehoboth Place will provide a high-quality landscaped street connected the development with South Circular Road. ✓ The proposed development will make a significant positive contribution to character and identity of the neighbourhood. The replacement of the existing low quality warehouse type

Criteria no. & Aspect	Provisions	Statement of Consistency
		<p>buildings on the site, with a new residential neighbourhood of strong architectural design and with significant public realm and landscape features will positively contribute to the area. Whilst the site sits behind much of the existing development, the link by way of the improved Rehoboth Place will offer a key link to the new neighbourhood, via a landscaped plaza at the entrance to the site. A number of ground floor active uses will positively contribute to footfall and sense of place</p> <ul style="list-style-type: none"> ✓ The inclusion of a Multi-Sport Playing Pitch and a large public park (Player's Park) to the north-east and east of the site will provide community facilities including a playground to future occupants and members of the local community surrounding the site. ✓ Particular care has been taken in respect of existing boundary conditions and the requirement to replace/upgrade these boundaries. This is addressed in detail in the Landscape Design Statement and

Criteria no. & Aspect	Provisions	Statement of Consistency
		<p>associated drawings. The general principle has been to, where possible, retain and repair existing boundary conditions. In a number of instances, existing boundaries are formed to gable ends of existing buildings on site. In some cases, these gable walls are proposed to be retained and repaired to maintain existing boundary conditions. This is considered a positive intervention in terms of maintaining some remnants of the existing use, whilst also minimising impact on adjacent properties. To the east, temporary boundary conditions are proposed in the form of temporary fencing with planting, until such time as development of these lands are brought forward in the context of adjacent Player Will's Factory site and wider SDRA 12 Lands.</p>
<p>2. Connections How well connected is the new neighbourhood?</p>	<ul style="list-style-type: none"> - There are attractive routes in and out for pedestrians and cyclists. - The development is located in or close to a mixed-use centre. 	<p>✓ The site is an infill site of significant scale. A key access route to the site is via Rehoboth Place to the west and it is proposed to widen and upgrade this street as part of the proposed development. The</p>

Criteria no. & Aspect	Provisions	Statement of Consistency
	<ul style="list-style-type: none"> - The development's layout makes it easy for a bus to serve the scheme. - The layout links to existing movement routes and the places people will want to get to. - Appropriate density, dependent on location, helps support efficient public transport. 	<p>entrance to the site from Rehoboth Place will be characterised by a landscaped pedestrian plaza, leading to an east west street with generous footpaths. Further east a widened street runs on a north-south axis, which will provide for future connections to the wider SDRA 12 Lands.</p> <ul style="list-style-type: none"> ✓ The scheme also provides for connections south to South Circular Road with internal connections in a north-south and east-west direction, through to the eastern boundary of the site to provide future connections. ✓ Further provided is a secondary vehicular access route to the north-east of the site which will provide connections to the multi-sports playing pitch and St. Teresa's Playground via Donore Avenue. ✓ All routes through the scheme facilitate pedestrian and cyclists as a priority. Generous footpaths and shared surfaces are provided to encourage pedestrian and cyclist use and permeability. ✓ The scheme is located close to the city centre,

Criteria no. & Aspect	Provisions	Statement of Consistency
		<p>with a range of services and facilities. The city centre is within reasonable walking and cycling distance and there are a range of bus services available on South Circular Road.</p> <ul style="list-style-type: none"> ✓ The layout ensures connections to South Circular Road, with future connections east in accordance with the wider approach for the SDRA 12 and Framework Plan lands. The layout therefore ensures a high level of permeability. ✓ As indicated above, the widened Rehoboth Place together with generously wide internal routes, will ensure that there is no inhibition to bus access to the site. ✓ As indicated previously, the opportunity to increase densities within a sensitively designed scheme relative to surrounding conditions is proposed in this urban location, ensuring that the population of the site is maximised and that the urban location close to the city and on a high efficiency bus route, is utilised.
3. Inclusivity	New homes meet the aspirations of a range	✓ The residential units within the scheme have

Criteria no. & Aspect	Provisions	Statement of Consistency
<p>How easily can people use and access the development?</p>	<p>of people and households. Design and layout enable easy access by all.</p>	<p>been fully designed to meet all relevant guidelines and standards in terms of sizes, storage areas, private open space, etc.</p> <ul style="list-style-type: none"> ✓ The scheme provides a mixture of BtR units (85% of total) and BtS units (15% of total), primarily to meet the demand for smaller units in response to reducing household sizes. A range of typologies are provided, including a number of house-type units. The scheme is considered to respond well in terms of providing a range of households to meet market demand. ✓ The development is designed to meet all Part M (Building Regulations) requirements. The scheme has been sensitively designed to ensure ease of travel through both the public realm and the buildings for people of all abilities. The scheme avoids ramps and stairs and provides clear, legible routes through the site.
<p>4. Variety</p> <p>How does the development promote a good</p>	<ul style="list-style-type: none"> - Activities generated by the development contribute to the quality of life in its locality. 	<ul style="list-style-type: none"> ✓ Whilst primarily a residential scheme designed to meet the significant shortfall in residential accommodation in the

Criteria no. & Aspect	Provisions	Statement of Consistency
<p>mix of activities?</p>	<ul style="list-style-type: none"> - Uses that attract the most people are in the most accessible places. - Neighbouring uses and activities are compatible with each other. - Housing types and tenure add to the choice available in the area. - Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood. 	<p>city, the proposed development does provide both dedicated tenant amenities for future residents, active ground floor uses, a community resource building and a creche facility. The size, extent and type of commercial uses proposed has been based on a detailed Social Infrastructure Audit carried out by MH Planning.</p> <ul style="list-style-type: none"> ✓ The quantum of proposed commercial/retail uses also seeks to preserve the integrity and viability of existing and planned local centres in Dolphin's Barn and Cork Street respectively. ✓ Such uses are intended to provide for the needs of the future population, whilst also acknowledging that the city centre with its range of services and facilities is a short distance from the site. ✓ Commercial uses have been located at ground floor level to both provide activity and to ensure accessibility and visibility. ✓ In terms of housing choice and tenure, as indicated previously the predominant purpose of the residential content of the scheme is

Criteria no. & Aspect	Provisions	Statement of Consistency
		<p>to meet clear demand for rental accommodation in urban locations. However, a total of 53 no. Build to Sell units are proposed which will be available for purchase, adding to the availability of choice/tenure provided within the scheme.</p> <p>✓ The scheme does provide a range of type and size of units. It is noted that the predominant nature of the surrounding area is traditional housing. To reflect the nature and scale of this existing housing, the scheme ensures a tiering down to the site perimeters to ensure that the existing site boundary conditions are dealt with in a sensitive and appropriate manner.</p>
<p>5. Efficiency How does the development make appropriate use of resources, including land?</p>	<ul style="list-style-type: none"> - The proposal looks at the potential of higher density, considering appropriate accessibility by public transport and the objectives of good design. - Landscaped areas are designed to provide amenity and biodiversity, protect buildings 	<p>✓ The site offers an excellent opportunity for increased densities to make an important contribution to the shortfall in the housing market and as such the opportunity for increased densities is responded to through the provision of taller buildings more centrally within the site.</p> <p>✓ The site location within a short distance of the city</p>

Criteria no. & Aspect	Provisions	Statement of Consistency
	<p>and spaces from the elements and incorporate sustainable urban drainage systems.</p> <ul style="list-style-type: none"> - Buildings, gardens and public spaces are laid out to exploit the best solar orientation. - The scheme brings an underutilised and semi-derelict site into more productive use. - Appropriate recycling facilities are provided. 	<p>centre and adjacent to high quality public transport, together with the site characteristics of a significant regeneration site in a back-land location, mean that the site is ideally suited to higher densities in a manner which ensures that there is no negative impact on internal or external environments.</p> <ul style="list-style-type: none"> ✓ A series of verified views prepared demonstrate that the scale of the proposed development responds positively to the site context, with the proposed buildings clearly sitting well within the urban context. Daylight and sunlight impact assessments clearly demonstrate that the scale and height of the proposed development does not have any significant negative impact on the internal or external environment in terms of overshadowing or daylight/sunlight impact. ✓ In terms of landscaped areas, whilst this is primarily an urban scheme, a series of high-quality plazas and spaces are provided, with appropriate soft landscaping which contributes to

Criteria no. & Aspect	Provisions	Statement of Consistency
		<p>biodiversity. The scheme further incorporates a large Multi-Sport playing pitch and the associated St. Teresa's Boulevard and St. Teresa's Playground, together with a large public park, Player's Park.</p> <ul style="list-style-type: none"> ✓ The proposal at Bailey Gibson achieves a high-quality public realm and domain through the design of pedestrian friendly streets interspersed with plaza areas. Future development of the wider SDRA 12 Lands will provide for an integrated and cohesive design approach across the regeneration site. ✓ A central and early consideration in the design of the scheme was to ensure that public areas and communal open spaces are high quality environments which achieve appropriate amounts of sunlight. It is clear from the submitted Daylight and Sunlight Availability Assessment that this is achieved. All amenity spaces meet 100% of the requirements for direct sunlight. ✓ The development will provide an appropriate development on a

Criteria no. & Aspect	Provisions	Statement of Consistency
		<p>significantly under-utilised site. The site is presently vacant. The previous use on the site (an architectural salvage company) represented an inefficient use of this strategically located site.</p> <p>✓ The scheme has been designed to ensure that operational waste management facilities include recycling facilities for residents.</p>
<p>6. Distinctiveness</p> <p>How does the proposal create a sense of place?</p>	<ul style="list-style-type: none"> - The place has recognisable features so that people can describe where they live and form an emotional attachment to the place. - The scheme is a positive addition to the identity of the locality. - The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout. - The proposal successfully exploits views into and out of the site. - There is a discernible focal point to the 	<p>✓ The scheme aims to create a new residential neighbourhood. As indicated previously, in terms of landscaped areas, whilst this is primarily an urban scheme, a series of high-quality plazas and spaces are provided, with appropriate soft landscaping. The scheme's street network and legibility, populated to active uses at ground floor level, will provide a sense of place and community. The proposal at Bailey Gibson achieves a high-quality public realm and domain through the design of pedestrian friendly streets interspersed with plaza areas. Future development of the wider SDRA 12 Lands will provide for an integrated and cohesive</p>

Criteria no. & Aspect	Provisions	Statement of Consistency
	scheme, or the proposals reinforce the role of an existing centre.	design approach across the regeneration area.
<p>7. Layout</p> <p>How does the proposal create people-friendly streets and spaces?</p>	<ul style="list-style-type: none"> - Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around. - The layout focuses activity on the streets by creating active frontages with front doors directly serving the street. - The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers. 	<ul style="list-style-type: none"> ✓ The layout has been strongly influenced by desire lines and permeability. One dedicated pedestrian and cycle access point is available via Rehoboth Place, and pedestrian/cycle access is further available on the primary vehicular routes via South Circular Road and Donore Avenue. ✓ The scheme performs strongly in terms of providing active frontages. The active frontages are provided by a number of uses, including a creche, tenant amenity spaces, retail/café spaces, and access points to private residential properties. ✓ All routes through the scheme facilitate pedestrian and cyclists as a priority. Generous footpaths and shared surfaces are provided to encourage pedestrian and cyclist use and permeability. ✓ The scheme creates a series of welcoming streets, wide in nature and subject to high quality landscaping. A number of plaza spaces

Criteria no. & Aspect	Provisions	Statement of Consistency
		<p>are provided, for example at the junction with Rehoboth Place and west of the junction of the north-south and east-west streets. The proposal at Bailey Gibson achieves a high-quality public realm and domain through the design of pedestrian friendly streets interspersed with plaza areas. Future development of the wider SDRA 12 Lands will provide for an integrated and cohesive design approach across the regeneration area.</p> <p>✓ Vehicular traffic on the internal street network is limited. There is limited on-street car parking. This is assisted by a one-way traffic system entering and existing via South Circular Road and cars being encouraged to park cars in the secure. Low traffic speeds will be generated through the shared nature of the streets, planting close to the traffic aisle and the provision of civic spaces/plazas at intervals throughout the scheme.</p>
<p>8. Public Realm How safe, secure and enjoyable are</p>	<p>- All public open space is overlooked by surrounding</p>	<p>✓ The development has high degree of passive surveillance of the streets and associated</p>

Criteria no. & Aspect	Provisions	Statement of Consistency
<p>the public areas?</p>	<p>homes so that this amenity is owned by the residents and safe to use.</p> <ul style="list-style-type: none"> - The public realm is considered as a usable integrated element in the design of the development - Children’s play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood. - There is a clear definition between public, semi private, and private space. - Roads and parking areas are considered as an integral landscaped element in the design of the public realm. 	<p>spaces. Block BG2 will provide passive surveillance of the future open space to north-east of the site, both from residential units and from active uses at ground floor.</p> <ul style="list-style-type: none"> ✓ The public realm has been designed strongly as an integral part of the scheme. As indicated previously, the proposal at Bailey Gibson achieves a high-quality public realm and domain through the design of pedestrian friendly streets interspersed with plaza areas. Future development of the wider SDRA 12 Lands will provide for an integrated and cohesive design approach across the regeneration area. ✓ Across the design, streets are generous in width and provide safe and pleasant environments for future residents and visitors. ✓ Public spaces are all clearly defined. Where appropriate, street level private open space is provided with a planted privacy buffer from the street. ✓ As indicated previously, on-street parking is deliberately limited. Where provided, parking spaces are

Criteria no. & Aspect	Provisions	Statement of Consistency
		clearly delineated adjacent to the vehicular surface car parking.
<p>9. Adaptability</p> <p>How will the buildings cope with change?</p>	<ul style="list-style-type: none"> - Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation. - The homes are energy-efficient and equipped for challenges anticipated from a changing climate. - Homes can be extended without ruining the character of the types, layout and outdoor space. 	<ul style="list-style-type: none"> ✓ The proposed scheme is predominantly a BtR scheme with the 15-year ownership and operation covenant applying. ✓ All residential units are designed to meet current Part L requirements and the proposed development has been designed to a BREEAM rating of Excellent. ✓ The adaptability criteria typically relate to a more traditional housing development. The nature of the apartment units means that opportunity for extension is limited. This is standard across the apartment market. ✓ The units allow for the provision of a home office or similar, if desirable. There is sufficient internal space to adapt a second bedroom, if required, to a small home office within the proposed apartments.
<p>10. Privacy and Amenity</p> <p>How does the scheme provide a decent</p>	<ul style="list-style-type: none"> - Each home has access to an area of useable private outdoor space. - The design maximises the number of homes 	<ul style="list-style-type: none"> ✓ Homes have access directly to either a private terrace or balcony, which in all cases meets or exceeds minimum size requirements. The

Criteria no. & Aspect	Provisions	Statement of Consistency
<p>standard of amenity?</p>	<p>enjoying dual aspect.</p> <ul style="list-style-type: none"> - Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout. - Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units. - The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables. 	<p>balcony spaces are semi recessed to give shelter and privacy to the units allowing for the balconies to be used year-round.</p> <ul style="list-style-type: none"> ✓ Dual aspect exceeds the minimum 33% requirement. The dual aspect provision is 42%. ✓ All residential units are designed to current building regulation (Part E) standards and ensure appropriate sound/acoustic environments. ✓ The design of the scheme ensures that there is no undue overlooking into adjacent properties. ✓ Each residential unit is provided with storage space which meets or exceeds the minimum requirements.
<p>11. Parking How will parking be secure and attractive?</p>	<ul style="list-style-type: none"> - Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces. - Adequate secure facilities are provided for bicycle storage. 	<ul style="list-style-type: none"> ✓ Parking is principally provided at basement level. The provision of parking at basement level allows for a high-quality pedestrian environment to be created at surface level. ✓ Parking at surface level occurs on-street and will benefit from passive surveillance both from residential units and from ground floor active uses, in addition to footfall on the streets.

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

3.9 Childcare Facilities Guidelines for Planning Authorities (2001)

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

Relevant Policy / Principle / Guideline	Statement of Consistency
<p>Chapter 3: In new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site.</p>	<ul style="list-style-type: none"> ✓ A Childcare Demand Report accompanies this application. The assessment takes a conservative assumption in terms of the number of childcare spaces that will be generated by the scheme i.e. that all children will be cared for in a childcare facility. It identifies that there is existing under provision within the 1-kilometre zone of influence. The existing and future demographic profile for the area is identified. Based on all of the relevant parameters it is concluded that it is appropriate to integrate a childcare facility into the proposed scheme. ✓ Recognising the deficiency in childcare capacity within the catchment, the proposed scheme incorporates a childcare facility with a gross floor area of 347 sq.m and will thus provide for the maximum childcare needs generated by the scheme as well as providing a service for the wider catchment. ✓ This is considered reasonable as the provision of childcare within a catchment should not be concentrated in one location. To do so would distort the geographical distribution of facilities and undermine access to the service in the wider area.

4. Regional Planning Policy

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

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

Relevant Policy / Objective	Statement of Consistency
<p>RPO 3.2:</p> <p>Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.</p>	<p>✓ The application site is located within SDRA 12, which was identified by Dublin City Council as a regeneration area in the DCCDP which encourages compact growth.</p>
<p>RPO 3.4:</p> <p>Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</p>	<p>✓ The subject development does not fall within development classes set out in Part 1 of Schedule 5.</p> <p>✓ The proposed development falls within the category of an 'Infrastructure Project' within Schedule 5 (10) (b) of the Planning and Development Regulations, which provides that a mandatory EIA must be carried out for projects including inter alia; 10(b)(i) <i>Construction of more than 500 dwellings.</i> The proposed development incorporates 345 no. residential units and EIA is thus not a mandatory requirement under this provision. 10(b)(ii) <i>Urban</i></p>

Relevant Policy / Objective	Statement of Consistency
	<p><i>development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)</i> The application area is c.5.1 hectares and surrounding land uses comprise residential, health related and commercial. Given the site's proximity to the city centre, the emerging pattern of development in the City i.e. compact urban growth, the site may be defined as being at the edge of a business district and applying the precautionary principle, it is considered that on this basis an EIA of the proposed development is required and is submitted with this application under separate cover.</p> <ul style="list-style-type: none"> ✓ An AA Screening Report accompanies this submission.
<p>RPO 4.3:</p> <p>Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.</p>	<ul style="list-style-type: none"> ✓ The proposed development will be situated on an infill / brownfield site providing high density residential units within the canal ring of Dublin. The site is in close proximity to high capacity and high frequency public transport services and confirmed as acceptable by Irish Water.

Relevant Policy / Objective	Statement of Consistency
<p>RPO 5.3:</p> <p>Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.</p>	<ul style="list-style-type: none"> ✓ The subject site is well connected in terms of road and public transport. Fatima LUAS stop is c.800m north-west of the site, while South Clondalkin QBC links the site with the city centre and south-west suburbs of Dublin, extending along Cork Street / Dolphin's Barn Street c.200m to the west. Dublin Bus also operates along the South Circular Road with bus stops on the north and south side of the road c.100m from the site with services operating in both directions. ✓ The site is proximate to employment centres in the city centre, as well as the Coombe Hospital and St. James' Hospital. ✓ The proposed development minimises car parking provision to promote a modal shift. ✓ The scheme prioritises active modes of travel by enhancing permeability of the site, providing dedicated pedestrian and cycle routes in / out of the site and through the design of shared internal street spaces that slow vehicular traffic and give precedence to pedestrians and cyclists. ✓ Subsequent development of the adjoining Development Framework and SDRA 12 Lands will create additional connections for pedestrians and cyclists to the north and east.
<p>RPO 5.4:</p>	<ul style="list-style-type: none"> ✓ The net density is 225 no. units per hectare and is compliant with the

Relevant Policy / Objective	Statement of Consistency
<p>Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines' and 'Urban Development and Building Heights Guidelines for Planning Authorities'.</p>	<p>qualitative standards for the development of sustainable residential development as established in the Housing Quality Audit and Architectural and Landscape Design Statement that accompanies this application.</p>
<p>RPO 5.5:</p> <p>Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.</p>	<ul style="list-style-type: none"> ✓ Analysis of the demographic profile within 1km of the subject site demonstrates the need for the proposed housing mix. Census 2016 indicates that within a 1km radius of the subject site there are approximately two and half times as many 1-2 person households as there are 1-2 person homes - a deficit of c.150%. ✓ The proposed development of this central and accessible urban brownfield site would realise the objective of consolidation of Dublin and compact growth.
<p>RPO 8.7:</p> <p>To promote the use of mobility management and travel plans</p>	<ul style="list-style-type: none"> ✓ A Traffic and Transport Assessment & a Mobility Management Plan prepared by

Relevant Policy / Objective	Statement of Consistency
<p>to bring about behaviour change and more sustainable transport use.</p>	<p>Systra is included with this submission under separate cover. It concludes that overall, the location of the proposed development, along with the measures considered, will aim to ensure that travel by public transport, by bike or by foot is a preferred alternative to travel by private car for a significant portion of travellers.</p>
<p>RPO 9.13:</p> <p>Local authorities and relevant agencies shall ensure that new social infrastructure developments are accessible and inclusive for a range of users by adopting a universal design approach and provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives.</p>	<ul style="list-style-type: none"> ✓ The proposed creche will be available to cater to the needs of the wider community, not only the resident population. ✓ The proposed development is designed in accordance with the Building Regulations Part M, Universal Design principles.
<p>RPO 9.3:</p> <p>Support the sensitive reuse of protected structures.</p>	<ul style="list-style-type: none"> ✓ There are no protected structures on the subject site.
<p>RPO 10.16:</p> <p>Implement policies contained in the Greater Dublin Strategic Drainage Study (GSDSDS), including SuDS.</p>	<ul style="list-style-type: none"> ✓ The proposed development incorporates SuDS. Please refer to the Civil Engineering Infrastructure Report for Planning and Engineering Drawings prepared by BMCE submitted under separate cover for further detail.

5. Conclusion

This Statement demonstrates that the proposed development is consistent with relevant national and regional planning policy together with Section 28 ministerial guidelines.

The design of the proposed development has been informed by an understanding of the site context and the requirement to comply with planning and environmental legislation and policy.

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

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

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

The proposed development responds to the housing demands of the local community and workforce by incorporating a mix of unit tenures and typologies that will address the shortfall in rental accommodation and meet the identified needs of Dublin City. The proposed scheme also incorporates additional supporting retail and community functions, to maximise resident amenity. This residential led development has been designed to meet and where possible exceed the requirements of the Design Standards for New Apartments Guidelines (2020).

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

The design and layout of the proposed development will ensure the highest standards of urban design and sustainability are achieved, in a manner that responds to the established residential character and the wider strategic regeneration objectives for this site.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality Strategic Housing Development proposal which is now being submitted for the consideration of An Bord Pleanála under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.