

Planning Report

In respect of

Proposed Residential and Mixed-Use Development at Emmet Road

Prepared by

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On behalf of

Dublin City Council



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Executive Summary

This report has been prepared by John Spain Associates on behalf of Dublin City Council in support of a proposed Part X residential and mixed-use development at Emmet Road, Inchicore, Dublin 8. This report accompanies an application for approval to An Bord Pleanála made under Section 175 of the Planning & Development Act 2000 as amended.

In summary, the proposal will comprise a mixed-use development 578 no. apartments, consisting of 110 no. studio apartments, 172 no. 1 bedroom apartments, 250 no. 2 bedroom apartments (including 17 no. duplex apartments) and 46 no. 3 bedroom apartments (all apartments to have balconies or terraces), community facilities community hub/library, creche, supermarket, 5 no. retail related units (retail/café/restaurant/class 2 financial services floorspace) & 2 no. café units), a public plaza fronting onto Emmet Road and the installation of a new watermain c 200m in length along Emmet Road to the junction with Tyrconnell Road/Grattan Crescent. The proposal includes works to a protected structure (8705 - Richmond/Keogh Barracks, relating to works to rubble stone boundary wall).

The overall site is 4.68 hectares which includes a watermain upgrade from the site (and works surrounding the site) to the junction of Tyrconnell Road/Grattan Crescent. The main development site area is c. 3.72 hectares (net excluding taken in charge areas and mains upgrade on Emmet Road) and is bounded by Emmet Road to the north, Goldenbridge Cemetery to the south, "*Patriot's Path*" and Richmond Barracks to the east and St. Vincent's Street West to the west.

The proposed development is consistent with the National Planning Objectives set out in the National Planning Framework and the Regional Spatial & Economic Strategy for the Eastern region through the promoting of compact growth and higher density development at an accessible area which is well served by existing and proposed public transport links (Bus and Luas) and existing facilities within Inchicore. It will implement the regeneration of a vacant, previously developed site which currently detracts from the environment of the area and will provide an attractive landscaped interface with Emmet Road, through the inclusion of a public plaza; promoting permeability through the development.

The site has a Z14 land use zoning under the current Dublin City Development Plan 2016-2022 and the Draft City Development Plan 2022-2028 ("*The Draft City Plan*"). The objective of the Z14 land use in the Draft City Plan is "*To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use*".

The site is located within Strategic Development Regeneration Area (SDRA) 9 at Emmet Road. Overall, there are 17 no. SDRAs which the Draft City Plan notes as being critical to the core strategy of the Draft City Plan and delivering a higher density of development. The Draft City Plan acknowledges the importance of the SDRA lands to accommodate additional housing. The density of the proposed development at 155 units per hectare is within the density range (100-250 units per hectare) indicated in the Draft City Plan for a SDRA.

A density of c. 155 units per hectare (on the site of 3.72 hectares) makes efficient use of the Z14 SDRA lands, which is located within a public transport corridor; well served by high-capacity high frequency public transport (Luas and bus), within the existing built-up area, of Inchicore, which has a range of amenities and services within walking distance. The proposal includes a sustainable level of car parking (106 spaces) along with some 1,285 no. cycle spaces. The objective of the development is to introduce a sustainable living and working environment with adequate facilities and to establish a new community designed around a series of courtyard blocks and high-quality public spaces which combine to impart a sense of

place, recreation, and enjoyment, as well as being safe and attractive for use by the existing and new community at Emmet Road.

The height of the proposed development is predominately a mix of 5 and 7 storeys along with 3 storey elements, which is in compliance with the current City Plan 2016-2022 and also with the Draft City Plan 2022-2028. The proposed layout will result in significant positive impact on the wider public realm and enhance the experience for residents and visitors within the area. The proposed layout seeks to enhance the streetscape, delivering a high-quality urban design, and quality of dwelling for future residents, with a high degree of sunlight daylight for apartments and has a dual aspect ratio of c. 50.9%.

The proposed development provides a mix of units and tenures comprising social housing and cost rental apartments.

The design and layout of the proposed development has had regard to the surrounding character of the area, including Richmond Barracks, St. Michael's Church and Goldenbridge and provides a modest range of heights (predominately 5-7 storeys) in a series of 3 no. perimeter blocks. The proposal includes some modest interventions into the Richmond Barracks wall (a protected structure) in the north-western corner of the site, to include some openings and a reduction in height to provide greater permeability, passive surveillance and integration of the new plaza into the wider urban fabric of Inchicore.

The proposed development includes community floorspace in the form of a community hub/library of c. 2,810 sq. m (4 storeys). The community hub includes a multipurpose hall, flexible floorspace which can be used for meeting rooms and other community uses. The building offers an opportunity to co-locate community facilities, a public community hub/library, with mutual benefits arising from the synergies between the 2 no. elements. It is also proposed to provide a creche (816 sq. m) of 2 storeys located beside Block B which will be able to cater for the demand from the proposed development.

The proposed development includes a local neighbourhood shop (supermarket c. 2,476 sq. m, 1,765 sq. m net) which will provide existing residents and future residents of the scheme, access to much needed convenience floorspace. In addition it is proposed to provide 564 sq. m of retail/retail services floorspace (in 5 no. units) and 285 sq. m of restaurant and café floorspace (2 no. units) within the SDRA 9 lands is fully in accordance with and supported by the policies and objectives of the Retail Planning Guidelines, the Retail Strategy for the Greater Dublin Area, and the Dublin City Development Plan.

The proposed development provides 3 no. main areas of public open space (c. 0.72 hectares) or 19.4% of the site, which also includes a "Play Zone" is well in excess of the City Plan's requirement of 10% of the site area. The public open space areas comprise a plaza area located in the northern part of the site at Emmet Road, as well as open space areas to the front of Richmond Barracks, and also in the southwestern portion of the site at Goldenbridge Cemetery.

In addition, it is proposed to provide communal open space (for residents only which includes play areas) of some 4,307 sq. m which is in excess of the City Plan and Apartment Guidelines 2020 requirements (of c. 3,464 sq. m). All dwellings will have access to private open space in the form of a balcony or terraced area (in compliance with the City Plan and Apartment Guidelines 2020). The proposal also integrates with the existing Inchicore Community Centre, where the landscaping includes play provision for older children/teenagers.

The proposed development is considered; consistent with strategic national, regional and local policy objectives and consistent with the proper planning and sustainable development of the area and respectfully request that permission is granted.

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1.0 INTRODUCTION

This report has been prepared by John Spain Associates on behalf of Dublin City Council in support of a proposed Part X housing and mixed-use development at Emmet Road, Inchicore Dublin 8. This report accompanies an application for approval to An Bord Pleanála made under Section 175 of the Planning & Development Act 2000 as amended for a housing and mixed-use development.

In summary, the proposal will comprise a development of 578 no. apartments, consisting of 110 no. studio apartments, 172 no. 1 bedroom apartments, 250 no. 2 bedroom apartments (including 10 no. duplex apartments) and 46 no. 3 bedroom apartments (all apartments to have balconies or terraces), community facilities community hub/library, creche, supermarket, 5 no. retail related units (retail/café/restaurant/class 2 financial services floorspace) & 2 no. café units), a public plaza fronting onto Emmet Road and the installation of a new watermain c 200m in length along Emmet Road to the junction with Tyrconnell Road/Grattan Crescent. The proposal includes works to a protected structure (8705 - Richmond/Keogh Barracks, relating to works to rubble stone boundary wall).

This report has been prepared to provide clarity on the nature of the development project, and to demonstrate how the proposed development is consistent with the planning policy and land use development objectives for the area.

Report Structure. This justification report will comprise of the following sections:

- Section 2 sets out the site context and background.
- Section 3 provides a description of the proposed development.
- Section 5 sets out the recent relevant planning history.
- Section 4 provides a summary of the pre-application consultations.
- Section 6 outlines the relevant national policy and Section 28 Guidelines.
- Section 7 sets out the local planning policy comprising the 2016-2022 Dublin City Plan and the Draft Dublin City Development Plan 2022-2028.
- Section 8 concludes this report.

2.0 SITE CONTEXT AND BACKGROUND

2.1 SITE LOCATION

The subject lands are located in Inchicore, Dublin 8, bounded to the north by Emmet Road, to the south by Goldenbridge cemetery to the east by the former Richmond Barracks and the pedestrian link to the Bulfin estate next to Saint Michael's Church and to the west by Saint Vincent Street West.

The overall site amounts to some 4.68 hectares (including the Irish Water mains upgrade) with the main mixed use site comprising c. 3.72 hectares (net), a large portion of which comprises the lands of the (now demolished) Saint Michael's Estate housing development.

Figure 2.1 – Site Location



Source: Google Maps

The site is served by a series of bus stops to its immediate northern boundary along Emmet Road including:

- Route 13 – Nangor Road to St. Margaret's Old Airport Road via O'Connell Street
- Route 40 – Liffey Valley to Charlestown Finglas via College Green
- Route 68 – Greenoge to Hawkins Street

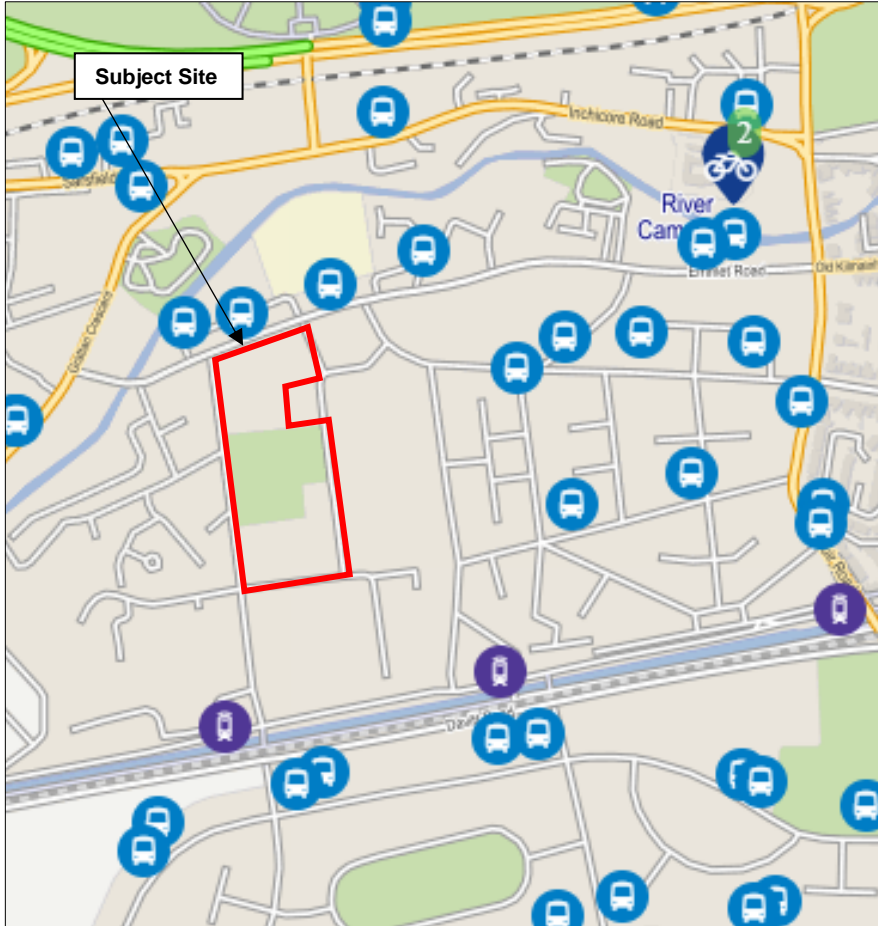
To the south of the proposed development (c. 500m to Galtymore Road) the site is served by bus route no. 123, which serves Walkinstown to Marino via the city centre.

The site is also served by the Luas Red Line c. 200m south of the site along the Grand Canal at Davit Road, providing high quality/high frequency/capacity service to the city centre Docklands, Tallaght, Saggart. The site is in close proximity to Goldenbridge Luas stop (c. 370m) and the Drimnagh Luas stop (c. 260m) to the south.

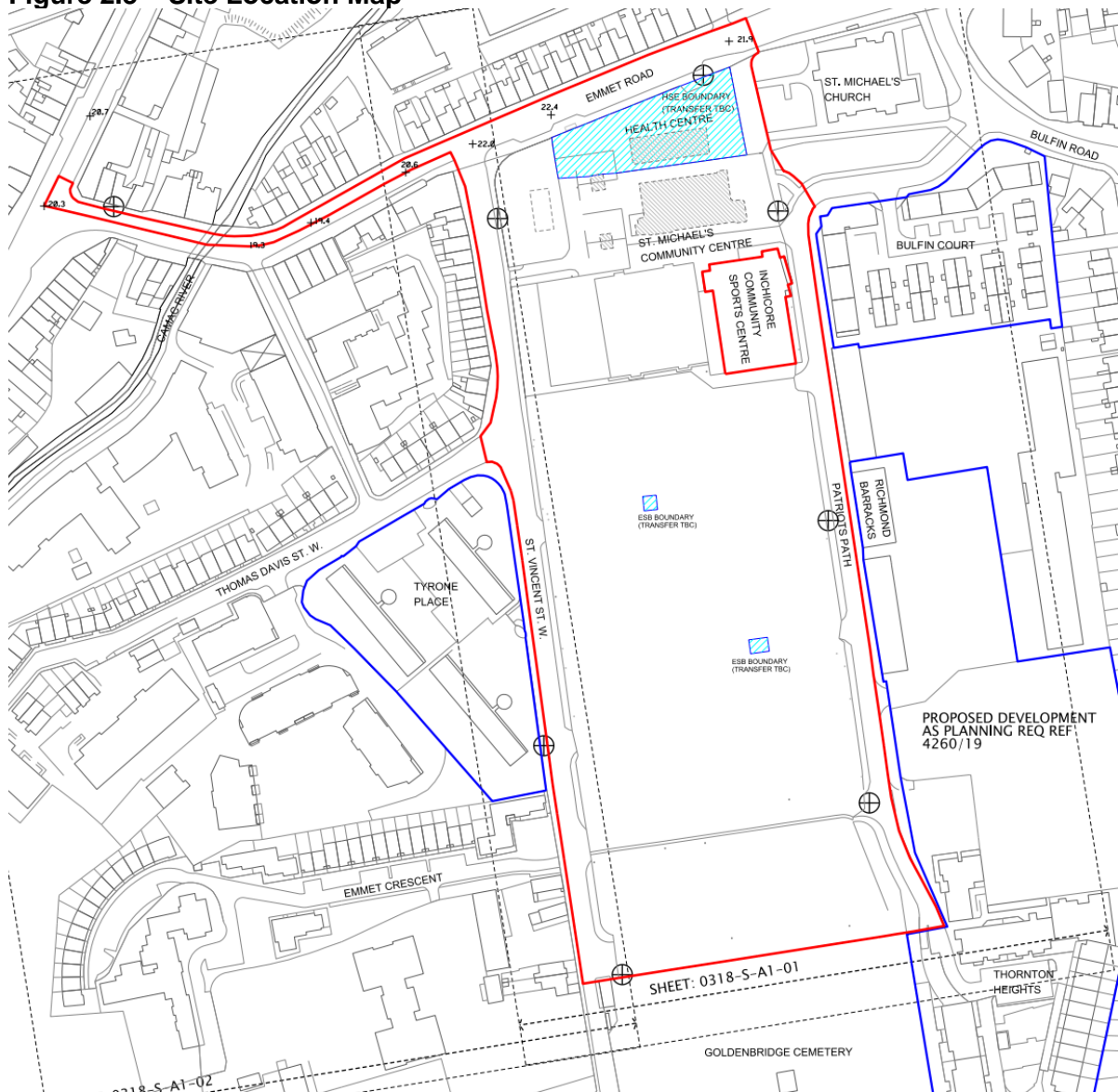
The site is also close 2 no. Dublin Bike Stations, located c. 600-750m to the northwest enabling easy access to a network of bike share stations as well as high-quality level of cycle lanes.

The subject application proposes the redevelopment of an underutilised brownfield site in accordance with the guidance set out within the policies and objectives of the Dublin City Development Plan 2016-2022 and the Draft Dublin City Development Plan 2022-2028.

Figure 2.2 – Bus and Luas Stops and Bike Station Locations



The site comprises c. 3.72 hectares (net) a large portion of which comprises the lands of the former (now demolished) Saint Michael's Estate housing development.

Figure 2.3 – Site Location Map

2.2 EXISTING CONTEXT AND USES

2.2.1 Wider Locational Context

Inchicore village has a collection of smaller local retailers, local services and pubs, with an intermittent spine of commercial activity stretching eastward on Emmet Road, passing by the site's northern frontage. Richmond Park, home of Saint Patrick's Athletic Football Club, is accessed from Emmet Road to the northeast of the site, opposite Saint Michael's church. Goldenbridge cemetery, to the south of the site, is currently in active usage. It is surrounded by a high stone wall, sections of which have been taken down to lower level on the southern and western sides to allow views into the cemetery. To the south of the cemetery is the Grand Canal greenway and pedestrian bridge over the canal, allowing access to the Drimnagh stop on the Luas Red Line.

The site is bounded to the west by Saint Vincent Street West, which features 2 storey terraced housing at its northern end, access to Mercy Secondary School via Thomas Davis Street West, the Tyrone Place estate (5 storey) in the middle and access to Our Lady of Lourdes primary school and Goldenbridge community facilities at its southern end via Emmet Crescent. Further to the east of the site is the Bulfin estate, consisting of 2 storey terraced and semi-detached

early 20th century Council housing. Further to the west are some more recent apartment developments (up to 7 storeys) and the Goldenbridge Industrial Estate which is accessible from Tyrconnell Road.

The community has several primary schools and one secondary school, a third level college, several churches and a collection of noteworthy cultural assets, namely the former Richmond Barracks and Goldenbridge Cemetery. Kilmainham Gaol, the Irish Museum of Modern Art and the Irish National War Memorial Gardens are all in close proximity. The Grand Canal, with its greenway, is situated to the south of Inchicore and the subject site adjacent to the Luas line. The Camac river flows in a north easterly direction through Inchicore, some sections of which are built over but other sections open onto green spaces.

2.2.1.1 Roads/Access

Principal road access to the subject site is from Emmet Road, designated R810, which provides a direct link between the city centre and the M50 motorway (Red Cow Junction). The R810 connects to the R111 to the northeast of the site, which routes around the southern side of Dublin adjacent to the Grand Canal. This enables easy access to the south of the city via the various arterial roads leading from the city centre. The R810 is connected to the site area by Saint Vincent Street West and Bulfin Road/Patriots Path (which becomes Thornton Heights at its southern end). These roads provide access to the western and eastern sides of the site respectively. There is currently no connection between these two roads through the site though there had been in the past.

2.2.2 Site Characteristics

The Site is located adjacent to Inchicore village within a well-established setting. The site is approximately 350m long with width varying from 105-115m in an east west direction. The mixed-use site comprises approximately 3.85 hectares across a mixture of existing buildings, existing hard landscaped areas and existing greenfield/brownfield space.

The site is gently sloping in a broadly south-west to northeast direction. The highest point of the site is located in the southwestern corner of the site adjacent to the gatehouse of Goldenbridge Cemetery at 27.5m OD. The ground level falls by approximately 1m along the length of the boundary wall to Goldenbridge Cemetery to 26.5m OD at the southeastern corner of the site. Levels fall to approximately 24m OD adjacent to the Inchicore Community Sports Centre across a length of c. 240m-this equates to an average fall of approximately 1 in 70 across the main open space of the site.

The gradual fall continues across the northern portion of the site up to the boundary with Emmet Road. At this point, the fall in level is more pronounced with the boundary wall forming a retention structure to maintain the high levels on the site than on the road. This is characterised by a 1.5m level drop from the grounds around the Celtic Pigeon Club to the public footpath along Emmet Road. This level difference is less pronounced to the front of the health centre and the ground slopes down at the entrance to provide vehicular access from Emmet Road.

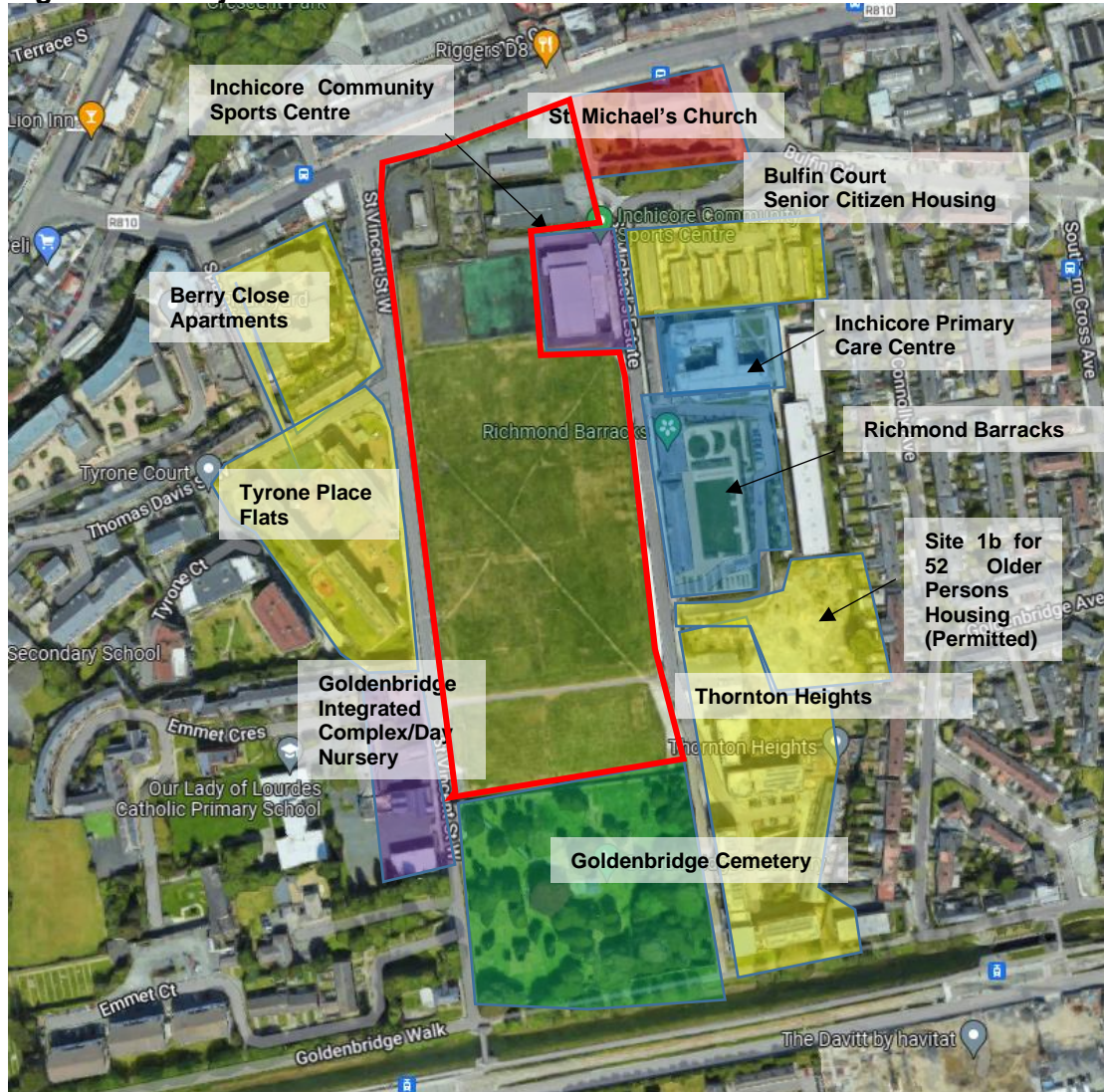
2.2.3 Previous Uses

The site of the proposed development has a long history of previous uses. It originally formed part of the Richmond Barracks-a British Army Barracks first occupied in 1814. Following the formation of the Irish Free state, the barracks changed into Irish hands in 1922 and remained in use as a barracks until its closure in 1925. Subsequently the site was handed over to Dublin Corporation with the development of Keogh Square purpose-built residential accommodation in 1947. A large-scale social housing development known as St Michael's Estate was completed in the 1970s consisting of a number of tower blocks. The buildings were in use up

until the early 2000s with demolition of the various blocks being undertaken between 2004 and 2013.

2.2.4 Existing Buildings/Structures on and in the vicinity of the subject site

Figure 2.4 – Adjacent Uses



Note: Site Outline excludes works on public road

The site currently comprises of a mixture of brownfield areas which previously housed the St Michael's Estate development together with buildings permitted for demolition under a separate Part 8 development:

- St Michael's Community Centre (due to be demolished as part of Part 8)
- Eve Tuiscent Health Centre (due to be demolished as part of Part 8)

In addition, the Inchicore Community Sports Centre comprises a two-storey structure constructed in the early 2000s which will remain in place.

The northwestern corner of the site is delineated by a section of historic walling, (protected structure) which previously formed the boundary of the Richmond Barracks. The wall is approximately 60m in length with frontage onto St Vincent Street West and Emmet Road. The wall is approximately 3.5m in height along St Vincent Street West with the top of wall dropping to be approximately 2.5m above footpath level at the junction with Emmet Road. Some works

to remove elements of the wall form part of the proposed development. This has been assessed in Chapter 14 of the EIAR which provides more detail.

2.2.5 Inchicore Community Sports Centre

Adjacent to the project site, the Sports Centre consists of a two-storey structure with a portion of the centre consisting of a double height sports hall. The building measures approximately 30m x 45m on plan with highest roof level approximately 10m above surrounding ground levels. The building was constructed in the early 2000s and is currently in use as a sports centre and creche, together with ancillary uses.

The Sports Centre is to be retained and integrated into the design.

2.2.6 Buildings/uses of note in the vicinity of the subject site

Civic Uses include:

- Richmond Barracks
- Goldenbridge Cemetery, including gatehouse and mortuary chapel
- Inchicore Primary Care Centre
- St. Michael's Church

Residential Uses include:

- Thornton Heights (social housing, apartment development along with Family Resource Centre)
- Tyrone Place (social housing, apartment development)
- Davis Court social housing
- Bulfin Court (senior citizen housing)

Richmond Barracks

Built in 1810 in response to the threat of a French invasion in the Napoleonic Wars, it was one of the largest barracks in Dublin at the time. (Nearly every British Regiment would spend time at the Richmond Barracks fighting in conflicts including the Crimean War, the Boer War, and World War 1.)

After the 1916 Easter Rising, Richmond Barracks would become a centrepiece in the fight for Irish Independence, housing over 3,000 suspected rebels before their sentencing. When the site was turned over to the Free State Army in 1922.

In 2016, major refurbishment works were completed on Richmond Barracks as part of a Dublin City Council Community Partnership to restore and commemorate the heritage of the building.

Richmond Barracks is now also home to a library, garden, and Culture Connects, a programme of cultural activities that celebrate the experiences and interests of the local communities and people.

The buildings that remain of the original barracks are located on the eastern side of Patriots Path. They are currently occupied in part by the HSE to form part of Inchicore Primary Care Centre with the remaining elements converted in recent times to use as a museum.

Inchicore Primary Care Centre

The Primary Care Centre building is part of the original Richmond Barracks built in 1810 and offers a number of health services to the local community including Public Health Nurses, Physiotherapists, Occupational Therapists, Dental Services and Mental Health Services

Goldenbridge Cemetery

To the south of Richmond Barracks, the Goldenbridge Cemetery was established in 1828 following Catholic Emancipation. It is significant in that it is the first Catholic Cemetery established post Catholic Emancipation in the 1820's predating Glasnevin. It is beautifully laid out with a neo-classical mortuary chapel, designed walkways and planting and surrounded by high walls with a small 2-storey gate lodge at its entrance and much of it has been recently restored. The site is significant for both its architectural features and its social and political history. It also has to be acknowledged that the site has changed considerably over time, particularly after the Barracks ceased to be used post-independence, and the majority of the barracks buildings and grounds were lost.

Thornton Heights

Thornton Heights is located to the southeast of the site. It is a social housing development completed by Dublin City Council in 2014 and consisting of 75 units in a mix of 5-6 storey apartment blocks and 2 storey terraced housing.

Our Lady of Lourdes Primary School

This school is located to the south-east of the site. It comprises a two-storey permanent structure together with a two-storey prefabricated structure along the St Vincent Street West elevation.

Tyrone Place

Tyrone Place consists of 3 blocks of apartments 5 storeys tall located directly to the west of the site.

Bulfin Court

Bulfin Court is located to the east of the site and is a housing development for senior citizens. It consists of a series of 8 blocks with a mixture of single and two storey structures.

St. Michael's Church

St Michael's Church is located to the northeast of the site. The structure was originally constructed as the garrison church for Richmond Barracks before becoming a catholic church for the people of Inchicore in 1926. The structure consists of a cut stone building set in church grounds surrounded by low level railings.

2.3 BACKGROUND AND TIMELINES FOR PROJECT

The Housing Land Initiative proposed that the subject lands at Emmet Road were to be developed by Dublin City Council. Feasibility studies were undertaken to assess the development potential of the site at Emmet Road.

A feasibility study was undertaken in 2017 by DCC which outlined that the site should support mix of tenures which included private, public and affordable rent. This study sought proposals for up to 420 no. units.

In 2018 DCC prepared a guidance document on the proposed redevelopment at Emmet Road. This report proposed that the site provide for cost rental units. It highlighted the need for social and affordable housing and suggested the site provide for 70% cost rental units and 30% social units. The study further recommended that the site has potential for up to 472 no. units to be delivered over 3 no. phases.

In 2019 Dublin City Council, in conjunction with consultants, prepared a Development Framework (non-statutory) Plan (DFP) for the redevelopment of lands at Emmet Road. The DFP set out the future vision for the lands at Emmet Road. The DFP provided a 'proof of concept' proposal which includes permeability, a series of open spaces as well as residential, commercial, civic (community hub/library) retail, as well as 484 no. apartments.

The plan outlines the development potential for a mixed-use scheme. This plan outlined that the site would comprise c. 484 no. residential units, community accommodation and commercial units. 70% of the units are envisaged to be cost rental under the Framework Plan.

It is noted the DFP provided the basis for the Tender Brief to the Design Team, which were appointed in 2020. Since then, the DFP proposals have been refined through detailed design by BMCEA Architects and the Design Team. The detailed design has resulted in an increase in the overall apartment numbers, in response to the National Planning Framework 2018 as well as the Building Height Guidelines 2018 which promote increased densities and a compact form of development.

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

3.1 INTRODUCTION

This application for approval to An Bord Pleanála under Section 175 of the Planning & Development Act 2000 (as amended) (the Act) is accompanied by detailed drawings and a detailed Architectural Design Statement, prepared by Bucholz McEvoy Architects (BMCEA) Architects, which provides a rationale for the design of the proposed scheme and the dwelling types proposed.

In summary, the proposed development will consist of 578 no. apartments, community facilities (comprising a community hub/library which includes flexible community meeting rooms, & Hall), a creche, 5 no. retail/retail service units, and 2 no. café/restaurant units), a supermarket, as well as a public plaza fronting onto Emmet Road. The proposal includes the installation of a new watermain along Emmet Road to the junction of Tyrconnell Road and Grattan Crescent from the site as well as works to a protected structure (8705 - Richmond/Keogh Barracks, relating to rubble stone boundary walls), to provide permeability.

Table 3.1 – Summary of Key Site/Development Statistics

Site Area	4.86 ha. (Including Irish Water main upgrade) Red Line Area 3.72 hectares main development site (net site area) 3.89 hectares (including Taken in Charge Areas)
Land Use Zoning 2016-2022 City Plan	Z14 <i>“To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and ‘Z6’ would be the predominant uses.”</i>
Land Use Zoning 2022-2028 Draft City Plan	Z14 <i>“To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use”.</i>
No. of Apartments	578
Density	155 units per hectare (based on 3.72 ha.)
Creche	816 sq. m
Community hub/library	2,810 sq. m
Retail Neighbourhood Shop	2,476 sq. m GFA (c. 1,765 sq. m net retail sales area)
5 no. retail/retail service units	564 sq. m (retail/café/restaurant/class 2 financial services units)
2 no. café/restaurant units	285 sq. m
Public Open Space	7,230 sq. m 19.4% of net site (3,720 sq. m required – DCC CDP). Emmet Place 3,166 sq. m Richmond Place 1,165 sq. m Goldenbridge Place 1,038 sq. m “Sports Zone” beside Inchicore Community Sports Centre 1,861 sq. m
Communal Open Space	4,307 sq. m (3,464 sq. m required Apartment Guidelines 2020)
Building Heights	3-7 storeys
Dual Aspect	50.9%
Plot Ratio	1:1.53 (based on 3.72 ha.)
Car Parking	106
Motorcycle spaces	8
Bicycle Parking	1,285
Total Gross Floor Area	56,838sq. m

Source: BMCEA Schedule of Areas. *Note: Names indicative and to be agreed in consultation post planning.

The proposed development has been comprehensively described in the public notices accompanying the submission to An Bord Pleanála. A Site Layout Plan, prepared by BMCEA is detailed below. A summary of the description and nature of development is provided hereunder:

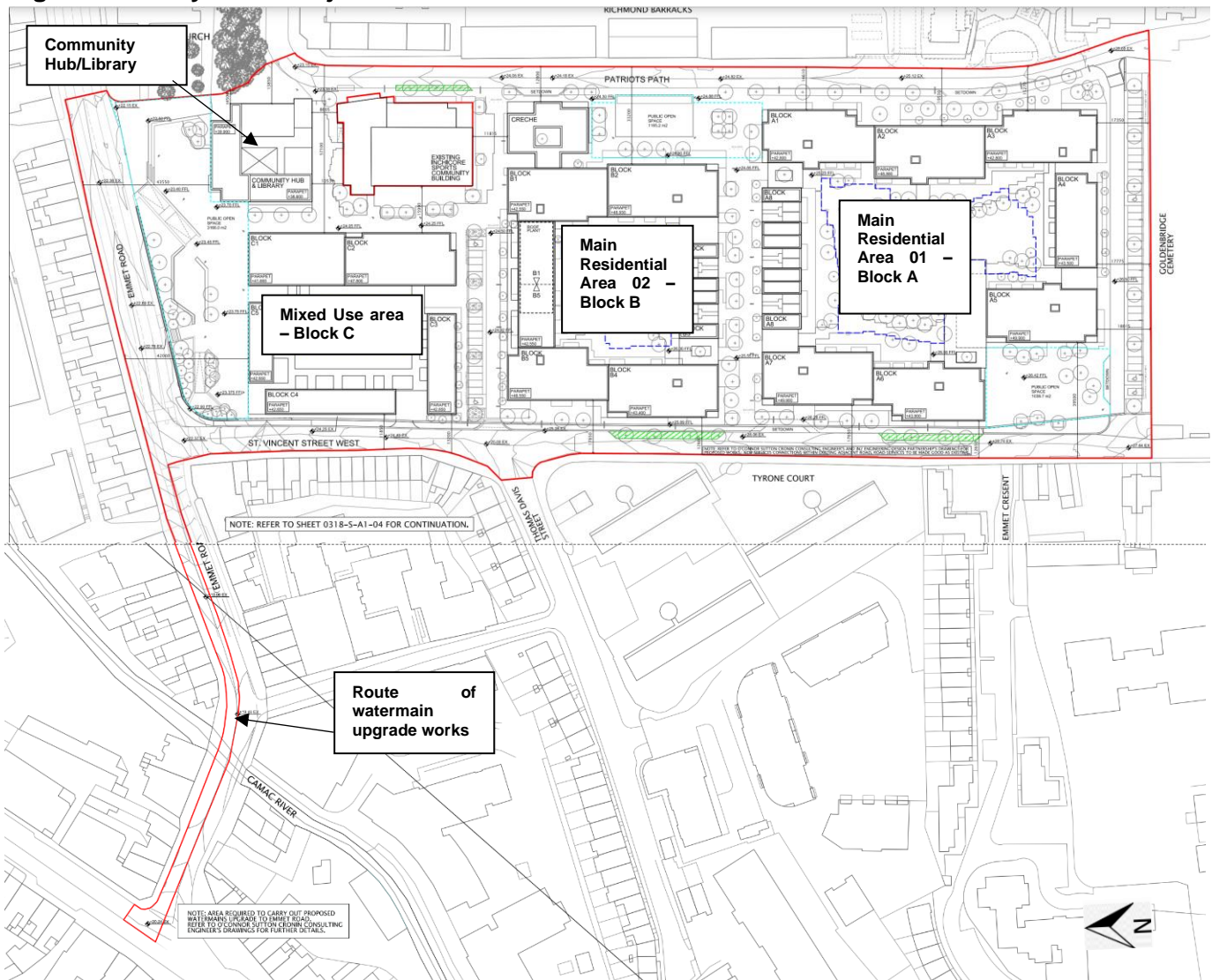
The development will comprise 578 no. apartments, consisting of 110 no. studio apartments, 172 no. 1 bedroom apartments, 250 no. 2 bedroom apartments (including 17 no. duplex apartments) and 46 no. 3 bedroom apartments (all apartments/duplexes to have balconies or terraces), community hub/library, creche, supermarket, 5 no. retail/café/restaurant/class 2 financial services units & 2 no. café/restaurant units), a public plaza fronting onto Emmet Road and the installation of a new watermain c 200m in length along Emmet Road to the junction with Tyrconnell Road/Grattan Crescent. The proposal includes works to a protected structure (8705 - Richmond/Keogh Barracks, relating to works to rubble stone boundary wall). The proposed development will consist of and includes:

- A) *In the southern portion of the site ('Main Residential Area 01' - Block A), comprises a courtyard perimeter building (306 no. apartments consisting of 76 no. studio apartments, 100 no. 1 bedroom apartments, 104 no. 2 bedroom apartments and 26 no. 3 bedroom apartments as well as a management office c. 59 sq. m) in a series of blocks as follows: Block A1 - 5 storeys (35 no. apartments), Block A2 - 7 storeys (55 no. apartments), Block A3 - 5 storeys (39 no. apartments), Block A4 - 5 storeys (20 no. apartments), Block A5 - 7 storeys (54 no. apartments), Block A6 - 5 storeys (37 no. apartments with café/restaurant at ground floor c. 80 sq. m), Block A7 - 7 storeys (54 no. apartments), and Block A8 - 3 storeys, (6 no. apartments/ 6 no. duplex units);*
- B) *In the central portion of the site ('Main Residential Area 02' - Block B), comprises a courtyard perimeter building (181 no. apartments consisting of 24 no. studio apartments, 43 no. 1 bedroom apartments, 103 no. 2 bedroom apartments and 11 no. 3 bedroom apartments) in a series of blocks as follows:
Block B1 - 5 storeys over partial below ground partial basement level (33 no. apartments) with an adjacent 2 storey creche of c. 816 sq. m with associated play areas, Block B2 - 7 storeys (54 no. apartments), Block B3 - 3 storeys (4 no. apartments/4 no. duplex units), Block B4 - 5 storeys (38 no. apartments), Block B5 - 7 storeys (48 no. apartments), including 2 no. duplex units fronting onto internal street, as well as provision of energy centre with associated plant/switch rooms and water storage/plant space (at partial below ground/basement level);*
- C) *In the northern portion of the site - the provision of a commercial mixed use Block C (5 storeys with 7 storey element) consisting of 91 no. apartments (10 no. studio apartments, 29 no. 1 bedroom apartments, 43 no. 2 bedroom apartments & 9 no. 3 bedroom apartments - including 5 no. duplex apartments fronting onto internal street), communal open space at third floor level, supermarket (including off-licence) of c. 2,476 sq. m GFA (c. 1,765 sq. m net retail sales area) at first floor level, with ground floor café/restaurant (c. 205 sq. m), 5 no. units (retail/café/restaurant/class 2 financial services floorspace c. 564 sq. m - to be amalgamated/subdivided as required);*
- D) *In the northern portion of the site the provision of a community hub/library of c. 2,810 sq. m (4 no. storeys) with flexible internal meeting rooms/spaces including internal double height halls as well as roof garden/terrace areas at second and third floor (roof levels);*
- E) *A new Vehicular access (as well as new adjacent service access) will be provided from St. Vincent's Street West into the undercroft level of Block C (with 3 no. internal streets provided between St. Vincent's Street West and "Patriot's Path" and Thornton Heights along boundary with Goldenbridge cemetery). The proposal also provides 106 no. car parking spaces, 8 no. motorcycle spaces as well as 1,285 no. cycle spaces within the blocks and single storey external covered store as well as surface spaces. (At undercroft level of Block C, the*

development includes 54 no. car parking spaces, 5 no. motorcycle spaces and 104 no. cycle spaces);

- F) Provision of 3 no. main areas of public open space and a “sports zone” area adjacent to the existing Inchicore Sports Community Centre c. 0.72 hectares as well as communal open space for the residents within the blocks;
- G) The proposal includes works, and alterations (including reduction in height, removal of sections, and provision of new openings) into the existing rubble stone wall (a protected structure no. 8705);
- H) The development includes water main upgrade along the Emmet Road from the subject site for c. 200m to to the junction with Tyrconnell Road/Grattan Crescent and tie in works surrounding the site;
- I) The development will also provide for all associated works and infrastructure to facilitate the development, including accommodation works, site clearance, hard and soft landscaping (to tie into existing streets), ESB substations, bin storage, green roofs, solar panels, heat pump systems (at roof level), play equipment, attenuation areas and connection to foul and surface water drainage and water supply, and construction access will be from St. Vincent’s Street West and Patriot’s Path as required.

Figure 3.1 – Layout of Project Site



Source: BMCEA Architects

3.2 SITE AREA

The overall site comprises c. 4.68 hectares (including watermain works along Emmet Road and tie in works surrounding the site) whereas the main development site comprises c. 3.72 hectares bounded generally by Emmet Road to the north, Goldenbridge Cemetery to the south, "Patriot's Path" and Richmond Barracks to the east and St. Vincent's Street to the west. Additional taken in charge areas bring the main development site to c. 3.89 hectares.

The overall site includes lands under the ownership of the HSE and the ESB. Letters of consent are included with the Part X application.

3.2.1 Gross Floor Area

The total gross floor area is 56,838 sq. m. The gross floor area of the residential component is 49,828 sq. m.

3.2.2 Plot Ratio and Site Coverage

The plot ratio is 1:1.53 (based on 3.72 ha.) and this is based on the extent of built development above ground in accordance with the Dublin City Development Plan.

The site coverage equates to 33.8 % based on the net development area (3.72 hectares).

3.3 ARCHITECTURAL DESIGN INTENT AND PRINCIPLES

The BMCEA Design Statement sets out the design rationale as follows:

"The project intent is to offer an affordable, sustainable, architecturally innovative, energy efficient, residential community supplemented and supported by community facilities and a neighbourhood centre including a supermarket fronting onto the northern edge at Emmet Road. The design is driven by a place-making agenda including promoting shared spaces that enhance the lives of both the residents, the surrounding community, and encourage social activity. The public realm is characterised by well landscaped streets and shared surfaces that prioritise pedestrian and cycle movements, with integrated cycle parking and car parking, organised within a mobility hub."

The homes in the scheme are designed to be affordable, are efficiently designed and easy to maintain; this is reflected in the site layout, unit design, building materials and landscape finishes. f residents. The homes in the scheme are designed to promote a sense of community in the everyday journeys of residents. They are designed to be low maintenance over their life cycle, supporting long term rental scenarios."

3.3.1 Demolition

No demolition of habitable structures relating to the proposed development is proposed. A separate Part 8 development under 2221/21 permitted the demolition of structures in the northern portion of the site. These works have been taken into account in respect of potential impacts/effects in the preparation of the EIAR accompanying this application. There are some demolition works relating to the existing protected boundary wall which are detailed below and Chapter 14, Volume II of the EIAR (as well as AHIA prepared by Blackwood Associates).

3.3.2 Urban Layout, Streets and Open Space

The re-creation of the urban character of the streets along St. Vincent Street West and Patriot's Path is one of the key urban design principles of the urban design approach. The establishment of strong, active, green street edges that are continuous with the existing urban realm of the area and form part of the tradition of street making with broad generous footpaths, lighting, tree planting and integrating sustainable urban drainage, public seating, which are active with life and passive surveillance.



Source: BMCEA Design Statement

The proposed layout will result in significant positive impact on the wider public realm and enhance the experience for residents and visitors within the area. The proposed layout seeks to enhance the streetscape, delivering a high-quality urban design.

The urban design approach in respect of streets and the public realm is further expanded in the Design Statement by BMCEA which seeks to create a permeable and safe public realm through the establishment of three pedestrian dominated streets that connect East to West and strongly re-link Bulfin to the East with Inchicore to the West, and create a network of connections to the new Public Spaces – from Thomas Davis Street to Richmond Barracks, from Tyrone Place to Richmond Place, From Goldenbridge Place along the Goldenbridge cemetery wall. Each street has a unique urban scale and character that provides human scale, visual variety, employing the principles of universal design and contextual sensitivity.

3.3.3 Height, Scale and Massing

The overall height and massing strategy is out in the BMCEA Design Statement notes that:

- *The positioning of 5 storey blocks along the street edges of St Vincent Street West and Patriots Path, and the recessing of the 7 story blocks to establish a human-scaled, safe and inviting streetscape.*
- *Providing 5 storey to 3 storey steps along the east-west street connecting Tyrone place to Richmond Barracks to vary the scale and provide visual variety.*
- *The courtyard blocks enclose the Communal Open Spaces which are also intended to be read as a “walled garden” for the residents of the Cost Rental & Social apartments.*
- *The creation of new East West streets that create a change in urban scale and character to the North South Streets and connect the North South Streets and new Urban Spaces in a networked ensemble.*

- The 5 and 7 story blocks on all three courtyards are typologically consistent, employing a strategy of not exceeding 8-units per floorplate per core, achieving an overall level of over 50% of the units with dual-aspect.

Figure 3.2 – Building Heights



The massing strategy has been developed to minimise the impact of any potential overshadowing to neighbouring buildings / amenity spaces, with measures such as setbacks of the 7 storey blocks from the street edges, and to minimise overshadowing of communal open spaces to provide good quality sunlight for residential amenity uses. The design proposals have been assessed in order to demonstrate compliance with the relevant guidelines inclusive of site sunlight and overshadowing analysis diagrams. Please refer to the Daylight and Sunlight Report as prepared by IN2 Engineering Design Partnership.

3.4 RESIDENTIAL DEVELOPMENT

The proposed development includes 3 courtyard blocks; comprising a large courtyard block to the south (beside Goldenbridge cemetery), a smaller courtyard block at the centre of the site, (opposite Richmond Barracks) and a small courtyard block above the retail / supermarket community carpark at the northern end of the proposed development at Emmet Road.

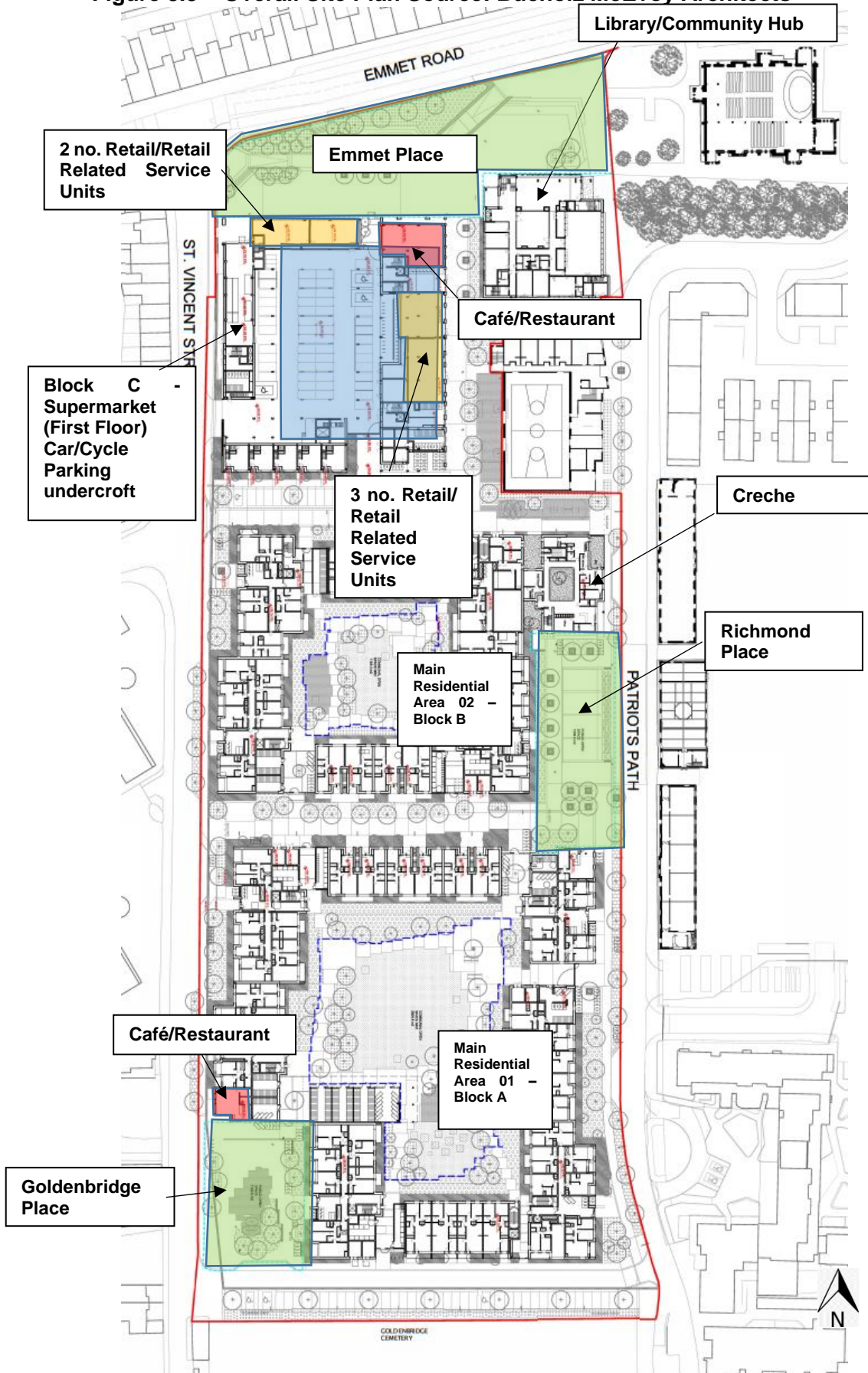
The following table provides a summary of the overall dwellings mix within the Part X development.

Table 3.2 – Overall Dwelling Mix

Unit type	Studio	1 bedroom	2 bedroom	3 bedroom	
Total	110	172	250	46	578
Overall Mix	19%	29.8%	43.3%	7.9%	100%

Source: BMCEA Schedule of Areas

Figure 3.3 – Overall Site Plan Source: Bucholz McEvoy Architects



Note: Names on open space areas indicative and for illustration - to be agreed

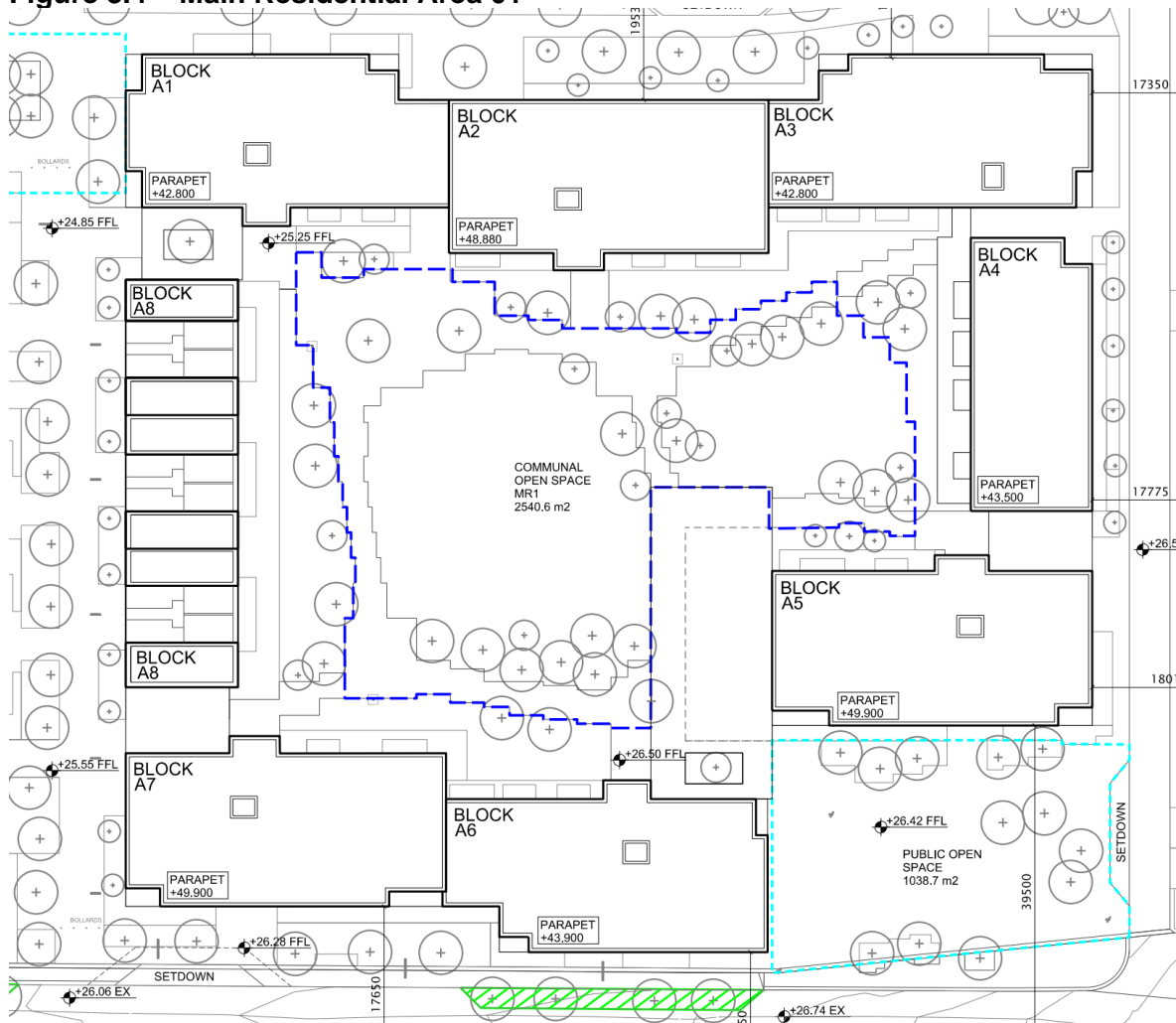
3.4.1 Main Residential Area 01

In the southern portion of the site ('Main Residential Area 01'), comprises a Courtyard perimeter building in a series of blocks consisting of:

'Block A' (306 no. apartments comprising 76 no. studio apartments, 100 no. 1 bedroom apartments, 104 no. 2 bedroom apartments and 26 no. 3 bedroom apartments as well as a management office) as follows:

- Block A1 - 5 storeys (35 no. apartments),
- Block A2 - 7 storeys (55 no. apartments),
- Block A3 - 5 storeys (39 no. apartments),
- Block A4 - 5 storeys (20 no. apartments),
- Block A5 – 7 storeys (54 no. apartments),
- Block A6 - 5 storeys (37 no. apartments with café at ground floor c. 80 sq. m),
- Block A7 - 7 storeys (54 no. apartments), and
- Block A8 - 3 storeys, (12 no. apartments including 6 no. duplex units);

Figure 3.4 – Main Residential Area 01



Source: BMCEA

The southern part of the site includes a public open space area (Goldenbridge Place c. 1,039 sq. m), which is surrounded by active frontages which include a café c. 80 sq. m (at ground floor level of Block A6) and the entrance areas to the communal open space to the north and to the adjacent blocks to the east. Further detail is provided below and in the BSLA Landscape Report.

Within Main Residential Area 01 there is a centrally located area of communal open space for residents of c. 2,540 sq. m (1,766 sq. m required as per Apartment Guidelines 2020).

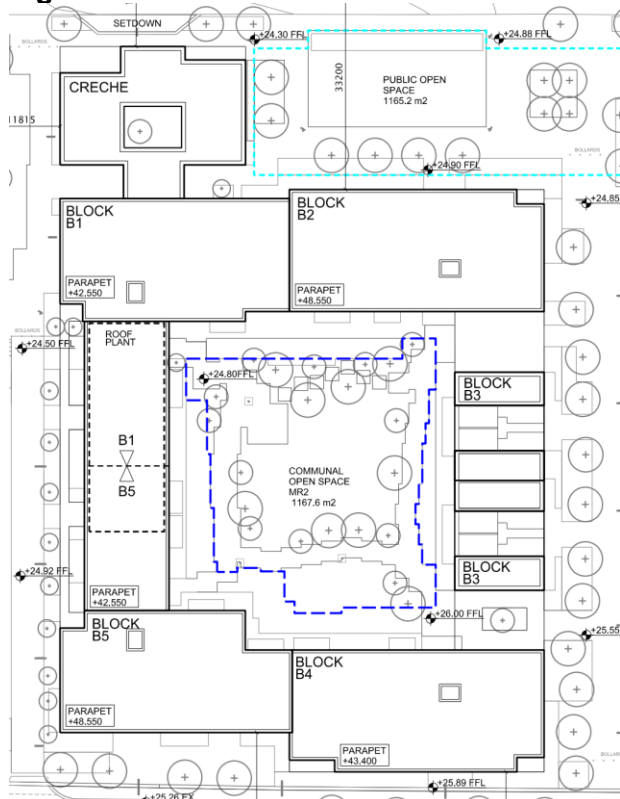
3.4.2 Main Residential Area 02

In the central portion of the site ('Main Residential Area 02' Block B), comprises a Courtyard perimeter building in a series of blocks consisting of: Block B' (181 no. apartments comprising 24 no. studio apartments, 43 no. 1 bedroom apartments, 103 no. 2 bedroom apartments and 11 no. 3 bedroom apartments) as follows:

- Block B1 – 5 storeys over partial below ground partial basement level (33 no. apartments) with an adjacent 2 storey creche of c. 816 sq. m with associated play areas,
- Block B2 – 7 storeys (54 no. apartments),
- Block B3 – 3 storeys (8 no. apartments including 4 no. duplex units),
- Block B4 – 5 storeys (38 no. apartments),
- Block B5 – 7 storeys (48 no. apartments), as well as provision of energy centre with associated plant/switch rooms and water storage/plant space (at partial below ground partial basement level);

Within Main Residential Area 02 is a centrally located area of communal open space of c. 1,167 sq. m (1,131 sq. m required as per Apartment Guidelines 2020).

Figure 3.5 – Main Residential Area 02



Source: BMCEA

Figure 3.7 – Emmet Road Frontage

3.6 MIXED USE DEVELOPMENT AREA – BLOCK C

The northern portion of the project site includes the provision of a mixed-use block (5 storeys with a 7 storey element) consisting of 91 no. apartments (10 no. studio apartments, 29 no. 1 bedroom apartments, 43 no. 2 bedroom apartments & 9 no. 3 bedroom apartments), communal open space at second floor level along with a supermarket of c. 2,476 sq. m GFA (c. 1,765sq. m net retail sales area, including off-licence area), café (c. 205 sq. m), 5 no. Retail/commercial units (c. 564 sq. m), with undercroft car and cycle parking in a mobility hub.

The supporting community and commercial elements of the proposed development (of some 6,951 sq. m) will comprise:

Table 3.3 - Summary of Proposed Community and Commercial Elements

Use	Area
Creche	816 sq. m
Community hub/library	2,810 sq. m
2 no. café/restaurant units	285 sq. m
Supermarket	2,476 sq. m
5 no. retail/retail related service units*	564 sq. m
Total	6,951 sq. m

*retail/café/restaurant/class 2 financial services units

3.6.1 Neighbourhood Shop (Supermarket)

At first floor level, the mixed-use building provides a supermarket of c. 2,476 sq. m GFA (c. 1,756 sq. m net retail sales area, including off-licence area). The mixed-use building will comprise a supermarket at first floor level, a village car-park below on ground floor (undercroft) level, five retail/retail related service units at ground floor level with two facing Emmet Road along the North façade and two facing the community hub/library building and the existing Inchicore Sports Community Building, as well as 91 residential apartment units located above the supermarket.

The communal open space is located on the roof of the supermarket and accessed via the cores and galleries provided. Screens are provided along the gallery decks to provide privacy to the individual apartments from the residences.

Along the southern edge the residential block consists of own door accessed duplex units at the ground floor, with gallery accessed units above. Along the western edge the residential block sits above the escalator to the grocery store with the residential entrance being located at the centre of the block. Along the eastern edge the residential units sit above the café and retail spaces; there are two residential entrances to the blocks above which start at first floor level. The dedicated residential bicycle parking is located adjacent to the entrances consistent with the approach taken generally on the development.

The undercroft "Village Carpark" is accessed from St. Vincent Street West in the southern portion of the block, immediately adjacent to the carpark entrance is the truck loading bay access; a roller-type gate will be used to close both the carpark and truck loading bay after hours and will be able to close the truck loading bay when it is not in use. The carpark is naturally ventilated and naturally lit thanks to the large openings provided along the north south axis.

3.6.2 Café/Retail/Retail Related Services Units

It is proposed to provide a mixture of commercial units in the development comprising 2 no. café/restaurant units as well as 5 no. retail/retail service units (c. 564 sq. m). In the northern part of the site, the proposed cafe c. 205 sq. m is located to the west of the proposed community hub/library building and fronts onto Emmet Place presenting an active frontage which will provide animation and activity and enhanced passive surveillance.

In addition, it is proposed to provide 5 no. retail/retail service units either side of the proposed café, which includes 2 no. retail/retail service units fronting onto Emmet Place and 3 no. retail/retail service units located along the internal north/south pedestrian link, located between the community hub/library/ (existing Inchicore Sports Centre) and Block C.

In the southern part of the site, it is proposed to provide a café unit of c. 80 sq. m which will front onto the Goldenbridge open space located beside the cemetery.

3.7 CRÈCHE

Located centrally within the development, it is proposed to provide a creche of c. 816 sq. m, which will front onto the Richmond Barracks open space.

The creche has capacity to serve the development proposal. In accordance with the publication "*Childcare Facilities - Guidelines for Planning Authorities*", 2001, provision has been made for 20 no. childcare spaces per 75 no. residential units, excluding 1 bed and studio units. The creche can cater for c. 79 no. childcare spaces but could cater for more children depending on final layout and breakdown of children (as composition impacts on floorspace required per child).

3.8 MANAGEMENT SUITE/OFFICE

The management office (c. 59 sq. m) is located along the north elevation of the of the southern courtyard which passively overlooks the plaza, as do the residential units which have their private amenity spaces overlooking the plaza.

3.9 PUBLIC REALM AND PUBLIC OPEN SPACE PROVISION

As set out in the BMCEA Design Statement, the creation of three new urban spaces that create a centre for Inchicore at Emmet Place, that spatially frame a dialogue between the new

architecture and the existing architecture of Richmond Barracks, St. Michael's Church and the landscape of Goldenbridge Cemetery, and create a new formal public space in front of Richmond Barracks, and a new public space at the entrance to Goldenbridge Cemetery - (all public spaces to be named later as part of a separate process).

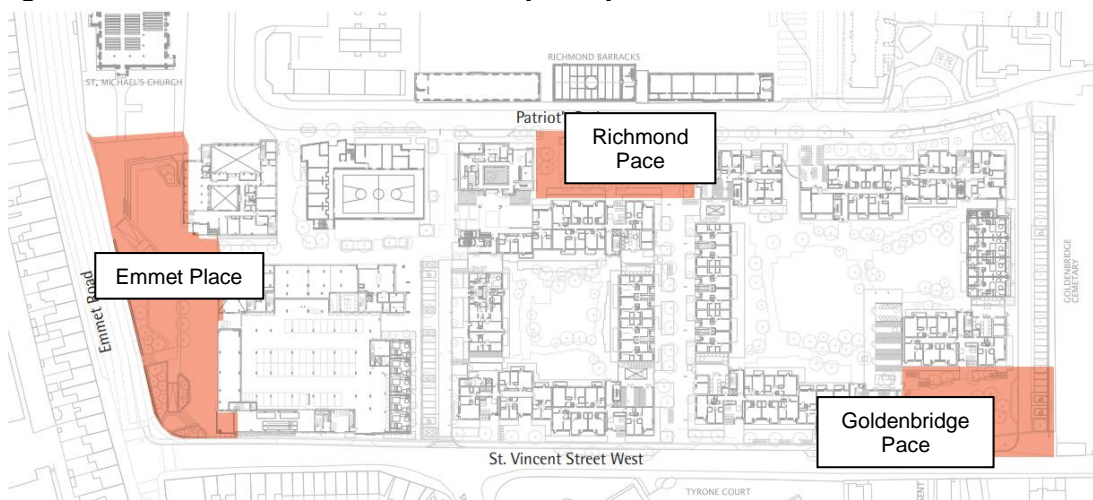
Overall, it is proposed to provide c. 0.72 hectares of public open space which equates to (19.4%) of the site (net site excluding the watermain upgrades and taken in charge areas) which is significantly above the City Plan requirement of 10% of the site.

It is proposed to provide three new public spaces, A. Emmet Place, B. Richmond Place, and C. Goldenbridge Place, and activates the north-south connection between Emmet Place and Richmond Place. (Note: Placeholder names above used for the purpose of drawing/planning reference only. Formal naming to follow post planning as part of consultation)

3.9.1 Public Open Space

It is proposed to provide three new public spaces, Emmet Place, Richmond Place, and Goldenbridge Place, and a "Play zone" area which activates the north-south connection between Emmet Place and Richmond Place. (Note: Placeholder names above used for the purpose of drawing/planning reference only. Formal naming to follow post planning as part of consultation)

Figure 3.8 – Location of Main Public Open Space Areas



To the north, south, west and of the existing Inchicore Community Sports Centre building new "parklets" are offered to enhance the level of flexible urban use focused on the young adult and teen. These three edges provide an element of 'parcours' (see Landscape report for details), which are carefully separated from pedestrian access to the retail units at ground floor of the commercial block, the fire tender access zone to the south.

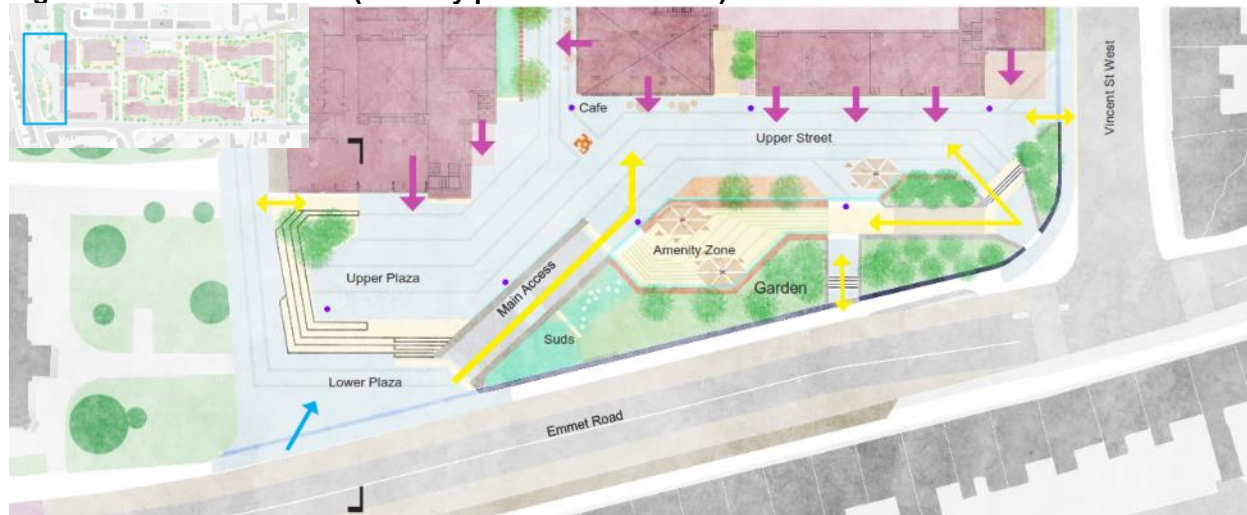
Figure 3.9 – Play Areas Age Classifications and Types Overview



3.9.2 Public Open Space Emmet Place (Place holder name)

Located along the northern extent of the site, fronting Emmet Road it is proposed to provide a substantial area of open space comprising some 3,166 sq. m in extent.

Figure 3.10 – Emmet Place (with key plan location insert)



Emmet Place along the northern frontage of the site relates to the busiest street bounding the site in Emmet Road, thereby building on this activity to encourage further public life. The new buildings will face Emmet Road and create new street frontage with the supermarket, cafe and retail, as well as the community hub/ library building facing onto it, attracting footfall and activity. The plaza is bounded on the other two sides by St. Michaels’ Church as the eastern backdrop, and the retained former barracks wall to the west. The space itself is designed to encourage day-to-day life while also allowing the flexibility of organised events, and also to increase the nature value in the site, with a garden sheltered behind the heritage wall.

3.9.3 Public Open Space - Goldenbridge Place (Place holder name)

The southern part of the site includes a public open space area (Goldenbridge Place c. 1,038 sq. m), which is surrounded by active frontages which include a café c. 80 sq. m (at ground floor level fronting onto the space).

Figure 3.11 – Goldenbridge Place (with key plan location insert)



3.9.4 Richmond Barracks Open Space (Richmond Place - place holder name)

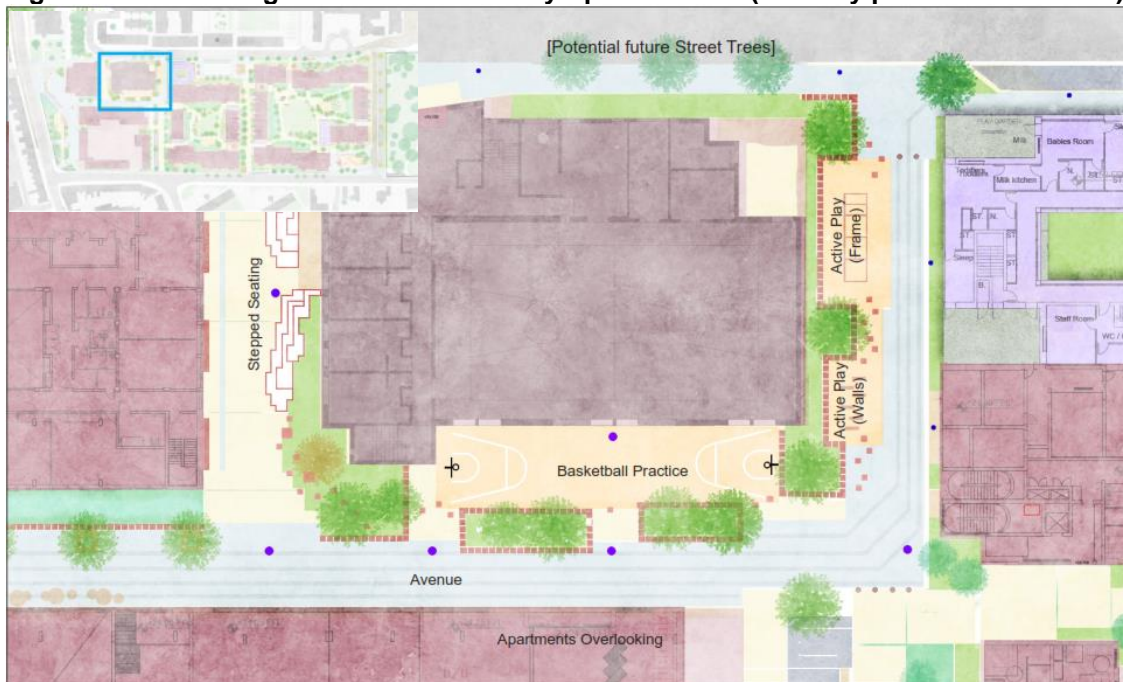
The central part of the site includes a public open space area (Richmond Barracks open space c. 1,404 sq. m), which is surrounded by active frontages which include a creche and the entrance areas to the communal open space to the west. The open space provides an appropriate area to integrate with the entrance to Richmond Barracks to the east.

Figure 3.12 – Richmond Place (with key plan location insert)



3.9.5 Integration of Existing Inchicore Community Sports Centre into the Layout

Figure 3.13 – Existing Inchicore Community Sports Centre (with key plan location insert)



An important amenity on the site is the play provision for older children/ teenagers, and in conjunction with the youth consultations, it was agreed that the environs around the existing Inchicore Community Sports Hall would be an appropriate location. Currently the building presents the surroundings with tall, mostly blank facades, which are not the most inviting interfaces. A key outcome of the proposed scheme would be to soften this impression and to help integrate this building into the wider landscape masterplan.

3.9.6 Communal Open Space Areas

In the mixed-use Block C, it is proposed to provide communal open space for the residents of some 600 sq. m above the supermarket at second floor level as shown below.

Figure 3.14 – Communal Open Space (Please refer to BSLA material for layout)



Communal open space is also provided within the courtyards of the main residential blocks (Blocks A & B). The communal open space is accessible only to residents. Privacy buffer gardens protect the private amenity space of the ground floor units from the communal open space. There are two double-height residents only entrances provided, one along the northeast edge of the middle courtyard building (Block B) and one along the eastern edge of the southern courtyard building (Block A). These openings provide important visual connections between the public open space and the communal open space.

Within Main Residential Area 01 (Block A) there is a centrally located area of communal open space for residents only of c. 2,540 sq. m (1,766 sq. m required as per Apartment Guidelines 2020).

Within Main Residential Area 02 (Block B) is a centrally located area of communal open space for residents only of c. 1,167sq. m (1,131 sq. m required as per Apartment Guidelines 2020).

3.9.7 Private Amenity Space

All residential units within the scheme are provided with private amenity space in the form of balconies on upper floors or private patio/terrace at ground floor level which meet and exceed the minimum required areas set down in Appendix 1 of the Apartment Guidelines.

3.9.8 Lighting Strategy

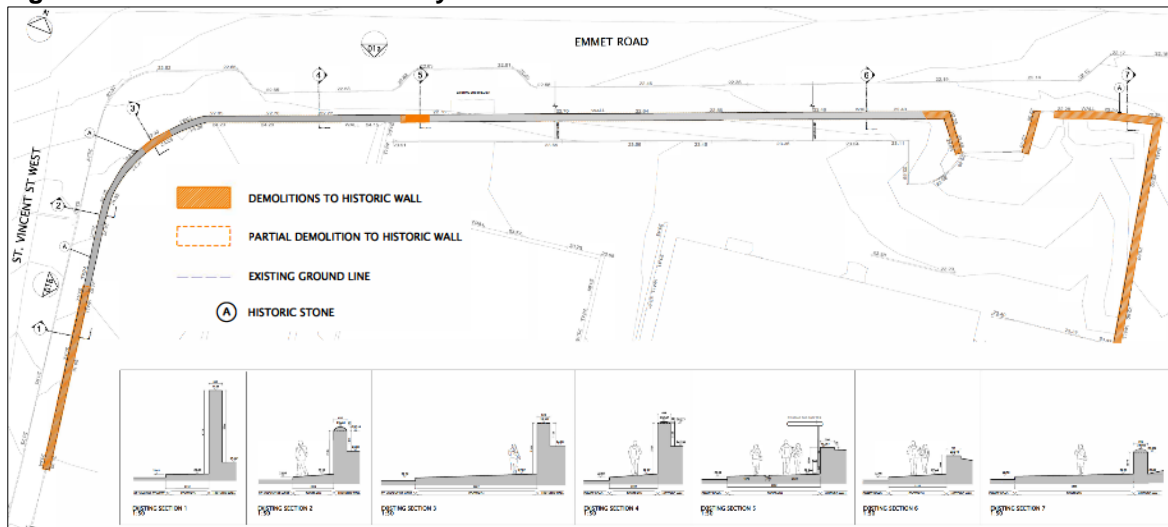
The landscaping proposals include a lighting strategy, and this is supported by an External Lighting Design Report prepared by IN2. The overarching principle of the strategy is to create

a safe night-time environment, ensuring no undue harm to neighbouring residents, and including bat friendly lighting. The lighting columns indicated are to be agreed post planning.

3.9.9 Works to Boundary Wall (a protected structure)

Located at the northeastern part of the subject lands the boundary wall associated with Richmond Barracks presents an opportunity and also a constraint in relation to the proposed development. With regard to the opportunity for the proposed development, what remains of the wall has the potential to provide legibility and inform future residents and visitors to the subject site of the long history associated with the site. The constraints in relation to the wall relate primarily to the lack of permeability and as a barrier to movement in the northwestern corner of the site, reducing the interaction with the existing neighbourhood. In addition, the wall also presents potential difficulties with regard to passive surveillance. Noting the above, the proposal includes for some discrete interventions to the wall to provide permeability, which will entail some removal of the protected wall. We refer the Board to Chapter 14 of the EIAR, prepared by Blackwood Associates for the Architectural Heritage impact assessment.

Figure 3.15 – Location of Boundary Wall



3.9.10 Access

Vehicular access to the site is provided from Emmet Road directly to the site, via Saint Vincent Street West to the west of the site and via Bulfin Road/Patriots Path to the east of the site. Pedestrian links are also provided on these routes with additional pedestrian linkages via public paths along the Grand Canal to the south of the site.

3.9.11 Parking

3.9.11.1 Car Parking

The proposal also includes 106 no. car parking spaces comprising 50 no. car parking spaces for the residential and the remainder allocated to the other uses including accessible spaces car share spaces and 10% electric vehicle charging points. The Village car parking spaces (54 no.) will be predominantly provided beneath the supermarket. 2 no car parking spaces will also be located adjacent to Goldenbridge cemetery

3.9.11.2 Cycle Parking

It is proposed to provide 1,285 no. bicycle spaces as follows:

Community Hub & Library	30
Supermarket	28
Retail / Commercial / Café	8
Creche	10
Residential in Commercial Mixed Use - Block C	152
Main Residential - Block A & B	768
Residential Visitors in Commercial Mixed Use - Block C	46
Main Residential Visitors - Block A & B	243
Bicycle Parking / Storage Subtotal	1,285

3.9.12 Delivery and Service Arrangements

The internal layout of the development allows both development servicing (such as deliveries) and waste collection to be conducted within the development itself, thereby avoiding the obstruction of either vehicular or pedestrian traffic on the surrounding road network.

The proposed development is not expected to generate significant quantities of waste during its operation, and the majority of waste generated is expected to comprise typical municipal waste streams. Please refer to the OWMP, prepared by Byrne Environmental for further details.

3.10 SURFACE WATER DRAINAGE

It is proposed to separate the surface water and wastewater drainage networks, which will serve the proposed development, and provide independent connections to the local surface sewer network and local wastewater sewer network respectively. The development will discharge treated and attenuated (to greenfield equivalent rate) rainfall runoff to the adjacent public surface water networks, that discharge to the river Camac.

The overall surface water drainage system, serving both catchments in the proposed development, is to consist of a gravity sewer network that will convey runoff from the roofs and paved areas to the outfall manhole. The new gravity networks will discharge a controlled attenuated flow rate to both the existing public network (southern catchment) and the open ditch / stream at the north-western corner of the site (northern catchment).

Please refer to OCSC Engineering Services Report and drawing B967-OCSC-ZZ-GF-DR-C-0500 for detail on the proposed surface water drainage layouts.

3.10.1 Foul Sewer

The proposed development is to be served by a gravity wastewater drainage network ultimately discharging to the existing wastewater sewers located at the eastern boundary of the site.

It is proposed that the existing sewer be diverted slightly to the east to facilitate the proposed development.

Please refer to OCSC Engineering Services Report and drawing B967-OCSC-ZZ-GF-DR-C-0500 for detail on the proposed foul drainage layouts.

3.10.2 Water Supply and Distribution

It is proposed that all connections for the proposed development will be from the existing 150mm diameter main along St Vincent Street West.

A pre-connection enquiry has been submitted to Irish Water and a Confirmation of Feasibility subject to upgrades has been received. It is required that an approximate 180m length of the 6-inch watermain along Emmet Road be upgraded to a 200mm diameter pipe to facilitate the proposed development.

Please refer to OCSC Engineering Services Report and drawing B967-OCSC-ZZ-GF-DR-C-0550 for detail on the proposed watermain layouts.

3.10.3 Irish Water Upgrade

The proposed development also will entail the upgrade for approximately 200m of existing 6" water main to 200mm on Emmet Road to the junction of Tyrconnell Road/Grattan Crescent.

3.11 UTILITIES

Gas Networks Ireland (GNI) existing local services infrastructure maps indicate that there should be sufficient capacity in the local network to accommodate the new development.

Electricity Supply Board (ESB) existing local services infrastructure maps indicate that there should be sufficient capacity in the local network to accommodate the new development.

Eir existing local services infrastructure maps indicate that there should be sufficient capacity in the local network to accommodate the new development.

3.12 WASTE MANAGEMENT

A Waste Resource Management Plan (WMP) and an Operational Waste Management Plan (OWMP) prepared by Byrne Environmental are submitted with the application.

The CDWMP includes information on the legal and policy framework for C&D waste management in Ireland, estimates of the type and quantity of C&D waste to be generated by the proposed development and makes recommendations for management of different waste streams.

The OWMP report presents a waste strategy that addresses all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the development.

4.0 PRE-APPLICATION PUBLIC AND DUBLIN CITY COUNCIL CONSULTATIONS

4.1 PUBLIC CONSULTATIONS

The proposed development has been subject to extensive engagement with the public to ensure that knowledge, views and concerns of from local and key stakeholders would be taken on board.

Public consultation has been ongoing since December 2020 and there has been a dedicated website (<https://emmetroad.ie>).

The following provides an outline of the engagement

- Public Consultation 2020
- Initial Research - 22nd December 2020

- Public Consultation 2021
- 22nd February 2021 - Summary of Survey Results December 2020
- 24th March 2021 - Online Worksheet Report January 2021
- 20th April 2021 - Online Consultation Event March 2021
- 21st April 2021 - Outdoor Exhibition at Richmond Barracks
- 26th April 2021 - 'Your Favourite Place to Play' – Pupils Drawings
- 26th April 2021 - 'The Dream Hangout Spot' – Core Youth
- 27th September 2021 - Outdoor Exhibition Now Available to View
- 21st October 2021 - Feedback Survey Deadline Announcement
- 29th November 2021 - Emmet Road Drone Video
- 29th November 2021 - Outdoor Exhibition Feedback Phase Two Consultation
- Summary Report of Phase 2

- Public Consultation 2022
- Public Information Session 1 – Saturday 12th March 2022
- Public Information Session 2 – Tuesday 15th March 2022
- Public Information Session 3 – Tuesday 29th March 2022
- Webinar – Tuesday 23rd March 2022
- Secondary School Workshop – Wednesday 30th March 2022
- Primary School Workshop – Wednesday 30th March 2022.

Core themes of the consultation related to a) height, density and tenure mix, b) safety and security, c) impact on traffic, transport and parking d) project timelines, e) management and maintenance and other issues.

Stakeholders discussed the current lack of sufficient community facilities and infrastructure in the area and the demand for more quality green space. In relation to the concerns on traffic and transportation stakeholders highlighted the need to campaign for increased capacity and frequency on public transport both bus and LUAS.

Many of the safety concerns stem from the community's previous experiences with anti-social behaviour and ongoing crime within the area.

All feedback and submissions have been carefully considered by the LDA and the Project Design Team and have influenced the final project design as contained in this application. Appendix A (Volume III of the EIAR) provides a summary of the public consultation undertaken.

4.2 DUBLIN CITY COUNCIL CONSULTATIONS

The evolution of the design for the proposed development has been guided and informed by the planning history of the subject site, the surrounding context, national, regional and local planning policy objectives and the issues and points raised during the pre-application discussions with the various internal departments of Dublin City Council. A series of pre-application meetings and consultations were undertaken with Dublin City Council throughout 2020, 2021 and 2022. The current scheme reflects amendments and improvements made following the comments made by the City Council.

- Planning Department
- Planning & Property Development: Forward Planning
- Transportation Planning
- Environment and Transportation, Roads and Traffic
- City Architects
- Engineering – Structural, Mechanical and Electrical
- Drainage Planning & Development Control
- Public Lighting
- Parks & Landscape Services
- Roads & Transportation
- Conservation
- Archaeology

With reference to traffic and transportation, the importance of providing a sustainable level of car parking and the inclusion of cycle parking (and car sharing), through the inclusion of an integrated mobility strategy was an important element of the feedback from the Roads and Traffic Department.

The importance of providing a good public realm benefiting the surrounding communities was also emphasised.

In relation to the Planning Department, the scale, height and massing of the proposed development was considered appropriate in its context. The preference for enclosed courtyards was expressed. In this regard the design was altered to provide enclosed courtyards.

The desire for the inclusion of ground floor activity where possible (subject to levels) was outlined. The proposed development includes own door access along east west streets and other areas where the level of the site allows.

The Parks Department welcomed the SuDs proposals and using green and blue roofs. Key was to make sure that the open spaces are balanced and usable for residents and public and the provision of SuDs measures. With regard to the open space at Emmet Road, an important point was that the design was to be resilient and as robust as possible and attractive for the community – to make them as attractive and the scale of the space was noted.

With regard to the Environment/Drainage Department, Using SuDs for runoff for the roads was encouraged particularly where new developments are close to rivers (in this case the Camac River). Various SuDs measures were suggested including filter strips.

The Drainage Department welcomed the strong consideration to multifunctioning spaces and green spaces and commented that a lot of thought went into the use of SUDS

The environmental pressures on the Camac were noted and that the local community were proud of heritage of river. The protection of the river is important from that perspective.

The Drainage Department noted the proposed development would result in an improved water quality leaving the site, including appropriate landscaping etc.

The proposed development has been adapted and refined in response to consultation with each of the departments and professionals detailed above.

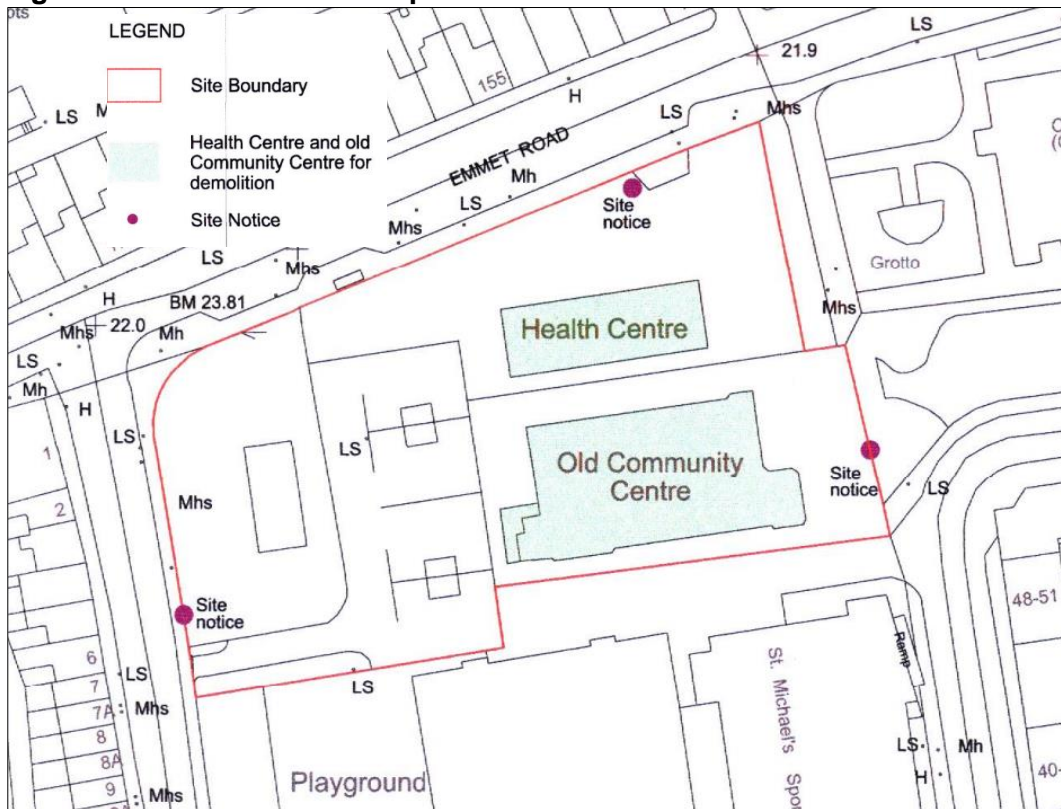
5.0 PLANNING HISTORY

5.1 SUBJECT SITE

5.1.1 Planning Reg. Ref. 2221/21

On the 25th of May 2021, permission was granted for a Part 8 development to Dublin City Council Housing and Community Services Department for the proposed demolition of the former health centre and St. Michael's community centre at Emmet Road, Inchicore, Dublin 8 and associated site clearance works which include the remains of a disused halting site together with internal site walls, fences, hard surfaces and utilities.

Figure 5.1 – Site Location Map Extract



Source: Planning Reg. Ref. 2221/21

The Dublin City Council Report concluded “*it is considered that the proposal will assist in facilitating the redevelopment of the subject site and, subject to compliance with the recommendations set out below, it is considered that the proposed development would not seriously injure the amenity of property in the vicinity and accords with the City Development Plan and the proper planning and sustainable development of the area.*”

As the demolition of the former health centre and St. Michael's community centre has been approved under Part 8, these works and the associated site clearance do not form part of this current application under section 175 of the Planning and Development Act 2000 as amended; however, the EIAR submitted with this application includes these works for the purpose of the environmental impact assessment.

5.2 RELEVANT PLANNING HISTORY WITHIN ENVIRONS

5.2.1 Planning Reg. Ref. 4260/19

To the east of the proposed development, Dublin City Council granted permission on the 20th of January 2020 on lands known as Site 1b, St. Michael's Estate, Inchicore, Dublin 8, for development comprising:

“a one to four storey older persons housing with supports scheme, incorporating: (i) 52 no. apartment dwellings with balconies; (a) 16 no. 2 bedroom apartments; (b) 36 no. 1.5 bedroom apartments.”

Figure 5.2 – Site Location Map Extract



Figure 5.3 – Landscape Plan Extract



5.2.2 KA29N.314091 Liffey Valley to City Centre, County Dublin – Bus Connects

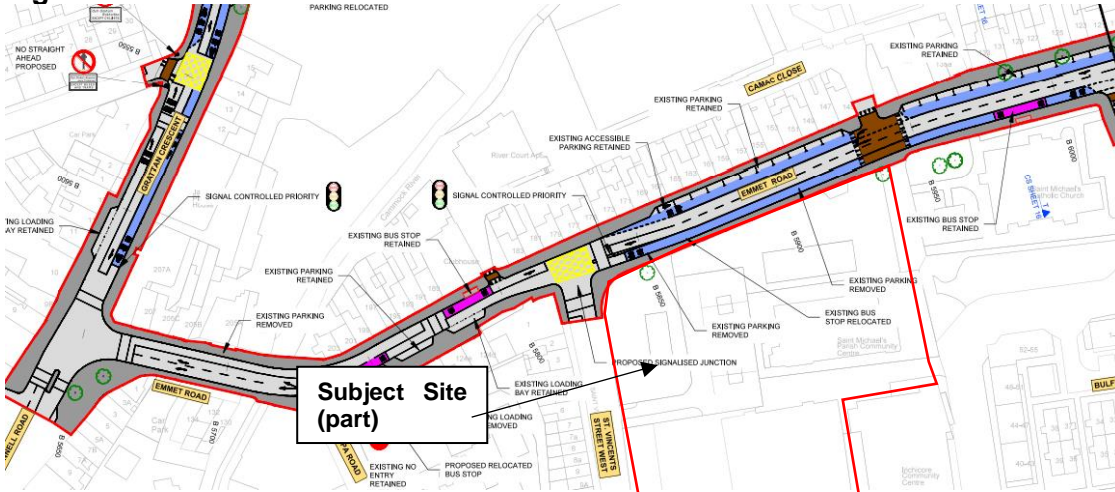
On the 15th of July 2022, the National Transport Authority lodged the Liffey Valley to City Centre Core Bus Corridor Scheme Compulsory Purchase Order 2022. The Case is due to be decided by 25/01/2023. (Further detail at [Home - BusConnects Dublin – Liffey Valley to City Centre \(liffeyvalleyscheme.ie\)](http://Home - BusConnects Dublin – Liffey Valley to City Centre (liffeyvalleyscheme.ie))).

Figure 5.4 – Overall Route



The route is located to the north of the proposed development on Emmet Road.

Figure 5.5 – Bus Connects Extract – Emmet Road



Source Sheet 10

The Liffey Valley to City Centre Core Bus Corridor Scheme (the Proposed Scheme) will support integrated sustainable transport usage through infrastructure improvements for active travel (both walking and cycling), and the provision of enhanced bus priority measures for existing (both public and private) and all future services who will use the corridor.

The aim of the Proposed Scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor

6.0 NATIONAL PLANNING POLICY AND SECTION 28 GUIDELINES

6.1 NATIONAL POLICY

6.1.1 Project Ireland 2040 National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

The National Planning Framework (in respect of changing family size) recognises that *“currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040.... Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms.”* (Page 95)

6.1.1.1 National Strategic Outcomes

The NPF states that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. Section 2.6 of the NPF seeks to provide compact and sustainable growth.

6.1.1.2 National Policy Objectives

The following National Policy Objectives (NPOs) objectives are outlined:

National Policy Objective 3a of the NPF states that it is a national policy objective to *“deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements”*.

With reference to NPO 3a, the proposed development accords with the NPF, in particular with its principles of compact growth and the reinforcement of the country's existing urban structure at all levels, through the provision of 578 no. apartments within the built-up envelope of Dublin City. Where housing policy is concerned, the proposed development accords with the NPF's core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements.

The NPF seeks to influence the location of new housing development and future population growth and targets the location of 40% of new housing development within and close to the existing 'footprint' of built-up areas over the lifetime of the framework. In this respect the subject site is located within the footprint of an infill site within Dublin City.

National Policy Objective 4 seeks to *‘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’*.

The proposal in compliance with NPO4 will provide an attractive, liveable well designed high quality urban place, which will enjoy a high quality of life and well-being.

It is also clear that there is a strong emphasis on increasing the density of development at appropriate locations which are well served by public transport. In relation to compact growth, the National Planning Framework states:

“Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located, and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities, and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.”

The proposed development represents the achievement of a sustainable density of 155 units per hectare on a strategically located site which is well served in terms of the necessary facilities, infrastructure, and amenities to facilitate a higher density development such as that proposed.

National Policy Objective 5 seeks to *“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”*

The proposed development directly responds to National Policy Objective 5 which seeks to develop cities of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity. This will be achieved through the provision of higher density residential development on an infill site within an existing built-up area, of Inchicore within Dublin city which is well served by high-capacity high frequency public transport. The proposed development will deliver an appropriate scale of residential development which will underpin the local significantly scaled employment hubs at St. James’ Hospital, which require investment in residential development to ensure that employees have high quality places to live adjacent to amenities (public open space and town centre).

National Policy Objective 11 of the National Planning Framework states that *“there will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth”*.

The proposed mixed-use development of 578 no. apartments, retail floorspace and Community hub/library, will encourage a new residential population, located in close proximity to local amenities and services all within the existing built-up area of Inchicore and the southwest inner city of Dublin.

National Policy Objective 13 of the National Planning Framework also states that:

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment”.

The proposed development provides for a sustainable level of car parking having regard to its location in an inner-suburban area, within walking distance of the Luas and bus services and to local amenities and services. The proposed height of the scheme provides a balance between achieving an appropriate density on the subject site while also having regard to the proximity of adjacent protected structures (St. Michael’s Church and Richmond Barracks).

National Policy Objective 27 seeks to *“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.”

With regard to NPO 27, the proposed development is designed to minimise reliance on private car use and encourage sustainable modes of transport and includes a mobility hub. The car parking provision proposed (106 no.) and cycle parking (1,285 no.), along with the proximity of the subject site to local amenities, employment and educational providers will ensure that walking and cycling is prioritised.

National Policy Objective 32 – *“To target the delivery of 550,000 additional households to 2040.”*

The 578 no. apartments will contribute towards the NPO objective no. 32 of delivering 550,000 additional households by 2040.

National Policy Objective 33 - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

In accordance with National Policy Objective 33, the new dwellings will be provided at a sustainable location, with access to existing services and facilities and new community/commercial facilities such as the new community hub/library, retail, cafes, as well as creche. The proposal is located within walking distance of a range of retail, cafes, and amenities located in the Inchicore area as well as public transport options (bus and Luas). The scale of the proposed development can be readily accommodated on the site which comprises c. 3.72 hectares (net area), while also having regard to adjoining protected structures (St. Michael’s Church and Richmond Barracks) as well as neighbouring residential areas surrounding the subject site.

National Policy Objective 35 - *Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

NPO 35 seeks to increase residential density in settlements, including infill schemes, and increased building heights. The proposed development is in accordance with NPO35 as it delivers a higher density scheme (c. 155 units per hectare) on an inner-suburban site with increased building heights (3-7 storeys).

6.1.2 Housing for All

‘Housing for All: A New Housing Plan for Ireland’, reinforces the critical and strategic need for new dwellings where it is a target to provide 300,000 housing units by the year 2030.

Housing for All - a New Housing Plan for Ireland’ is the government’s housing plan to 2030. It is a multi-annual, multi-billion-euro plan which will improve Ireland’s housing system and deliver more homes of all types for people with different housing needs.

In order to achieve this, Housing for All provides four pathways to achieving four overarching Housing Policy Objectives:

1. Supporting Homeownership and Increasing Affordability
2. Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
3. Increasing New Housing Supply; and
4. Addressing Vacancy and Efficient Use of Existing Stock.

The government’s overall objective is that every citizen in the State should have access to good quality homes:

- to purchase or rent at an affordable price;
- built to a high standard and in the right place;
- offering a high quality of life.

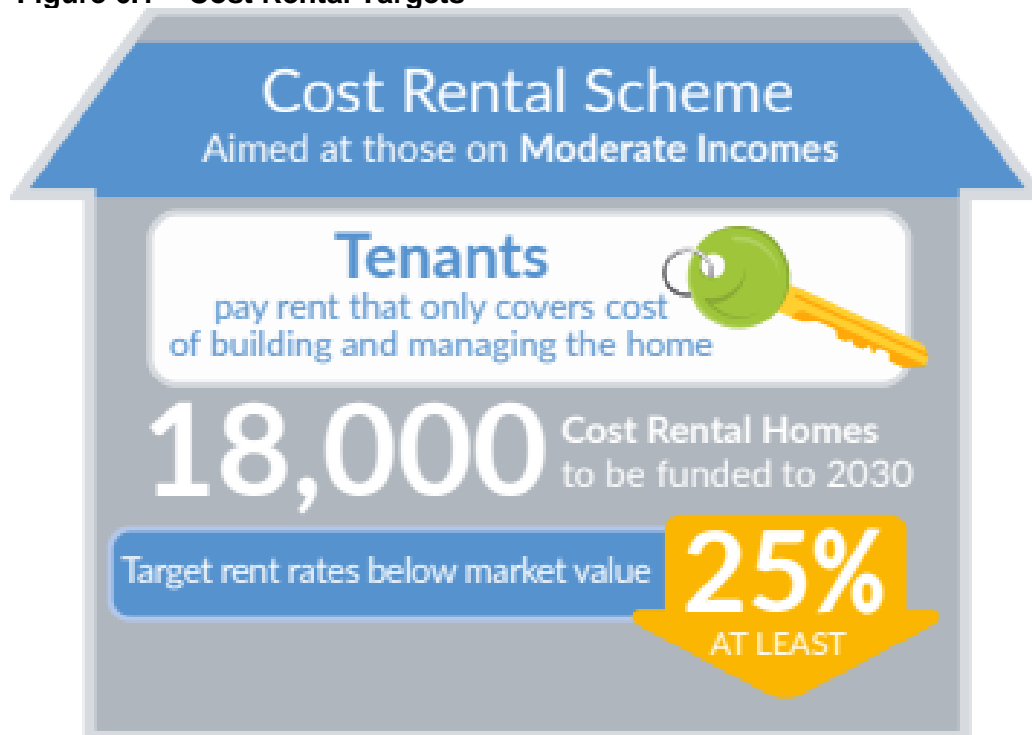
The government’s vision for the housing system over the longer term is to achieve a steady supply of housing in the right locations with economic, social and environmental sustainability built into the system.

In this regard the proposed development of 578 no. apartments will allow for new residential community, built to a high standard and quality, within the SDRA, with a range of amenities and services in Inchicore and also close to high quality high frequency/capacity public transport services.

Housing for All introduces the ‘Cost Rental’ model, which is a new form of public housing in Ireland. This Cost Rental model is targeted,

“at people who are above the social housing income limits, and who wish to rent or are unable to buy their own home. Under this tenure rents charged only cover the cost of developing, financing, managing and maintaining the homes. It also offers long-term security of tenure. Cost Rental will be targeted to achieve rents that are at least 25% below what they would be on the private market.”

Figure 6.1 – Cost Rental Targets



Source (Housing for All – a New Housing Plan for Ireland)

Housing for all recognises cost as rental as a key component for increasing affordability and a pathway to home ownership. The government envisages an average of 2,000 new Cost Rental homes every year with rents targeted at least 25% below market level. This will be achieved by the Government’s ‘Affordable Housing Fund’ which will provide a subsidy of up to €100,000 (depending on location and need) towards the home. This will reduce the cost of a home.

Housing for all foresees at least 18,000 cost rental homes by 2030. Figures 4.1 and 4.2 illustrate the housing targets within 'Housing for All'.

The Cost Rental model must relate to affordability for low to middle income earners, for people who are above the social housing income limits, and who wish to rent or are unable to buy their own home. Under this tenure rents charged only cover cost of developing, financing, managing and maintaining the homes. Cost Rental will be targeted to achieve rents that are 25% below what they would be on the private market. The Government plans to provide an average of 2,000 Cost Rental homes per year for the next 10 years. This model of housing is a first in type initiative for Dublin City Council.

Figure 6.2 – Projected Housing Output 2022-2030

Projected Housing Output (New Build) 2022 – 2030									
Tenure	2022	2023	2024	2025	2026	2027	2028	2029	2030
Social homes	9,000	9,100	9,300	10,000	10,200	10,200	10,200	10,200	10,200
Affordable & Cost Rental homes	4,100	5,500	6,400	6,400	6,100	6,300	6,400	6,300	6,300
Private Rental and Private Ownership homes	11,500	14,400	17,750	18,200	19,800	20,400	21,500	23,000	24,000
Total Homes	24,600	29,000	33,450	34,600	36,100	36,900	38,100	39,500	40,500

(Housing for All – a New Housing Plan for Ireland)

6.1.2.1 Commentary in relation to Housing for All

The proposed mixed-use development at Emmet Road will provide a mixed tenure of dwellings comprising cost rental, social housing apartments which will assist in the delivery of much needed homes, close to existing amenities as well as high quality public transport options and employment opportunities, thereby contributing to meeting the objectives of 'Housing for All'.

6.1.3 Regional Spatial and Economic Strategy 2019-2031

The Eastern & Midland Regional Assembly (EMRA) adopted the Regional Spatial & Economic Strategy (RSES) on 3rd of May 2019 and came into effect on the 28th of June 2019. The vision for the RSES is to *'create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all'*.

The Strategy is intended to:

- Support the continued growth of Dublin as our national economic engine;
- Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP);
- Support vibrant rural areas with a network of towns and villages;
- Facilitate the collaboration and growth of the Dublin – Belfast corridor;
- Embed a network of key towns through the Region to deliver sustainable regional development.

The principal purpose of the RSES is to support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP) and the

economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region.

The growth and settlement strategy of the RSES reflects the compact growth / urban consolidation objectives of the NPF. It seeks the consolidation and re-intensification of infill, brownfield and underutilised lands with Dublin City and its suburbs with 50% of all new homes targeted for Dublin and its suburbs to be located in the existing built-up area. This is to be achieved in tandem with the delivery of key infrastructure to achieve, in Dublin City Council's administrative area, an increase in population of circa 100,000 people by 2031.

6.1.3.1 Commentary in relation to RSES

The proposed redevelopment of the subject site for a higher density (155 units per hectare) residential mixed-use scheme, located in a Strategic Development Regeneration Area (SDRA), accords with the RSES which supports the consolidation and re-intensification of infill sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs.

As set out in this report, the subject site is in close proximity to an extensive range of public transport including Dublin Bus, the Luas, and future public transport improvements (BusConnects). Thus, the proposed development accords with the RSES which seeks to ensure that the development of high-density mixed-use schemes is co-ordinated with the delivery of key water infrastructure and public transport projects.

The subject development seeks to provide for a mixed-use development on a key urban infill site to increase densities, heights and urban consolidation within an SDRA. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

6.1.4 Draft Greater Dublin Area Transport Strategy 2022-2042

This draft strategy has been prepared by the National Transport Authority and was subject to public consultation up to January 2022. The aim of this strategy is to provide a sustainable, accessible and effective transport system for the Greater Dublin Area (GDA) which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports economic growth.

The Strategy includes four Strategic Objectives to achieve the aim which are as follows:

- An enhanced natural and built environment;
- A connected communities and better quality of life;
- A strong sustainable economy; and
- An inclusive transport system.

The proposed development is considered to be consistent with the objectives of the draft Transport Strategy as it will enhance the quality of the existing built environment on Emmet Road, and it will promote a better quality of life for existing and future residents by the regeneration of an underutilised brownfield site with a mix of compatible uses. The proposed development will support the use of existing public transport connections whilst also promoting sustainable modes of travel such as walking and cycling all within a high-quality mixed-use development.

6.1.5 Retail Strategy for the Greater Dublin Area 2008 – 2016

The Retail Strategy for the Greater Dublin Area 2008 – 2016 was published in July 2008 by the Dublin and Mid-East Regional Authorities. The Strategy aims to set out a co-ordinated, sustainable approach to the assessment and provision of retail within the GDA. The Strategy emphasises the role and importance of District Centres within the GDA retail hierarchy.

The subject site is an edge of centre site in Inchicore. Inchicore is designated as a Level 4 Neighbourhood Centre within the GDA retail hierarchy as set out in Table 6.1 of the Retail Strategy. The Retail Planning Strategy for the GDA 2008 acknowledges the importance of Neighbourhood Centres and note that *“encouragement should therefore be given to uses which support the community and help solidify the role of the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices”*.

Regarding edge of centre sites, the guidelines note that:

*“The Guidelines confirm that the preferred location for new retail development, where practicable and viable, is within town centres (or district or major village centres). However, where it is not possible to provide the form and scale of development that is required on a town centre site, **consideration can be given to a site on the edge of a town centre, providing it is within an easy and convenient walking distance from the primary shopping core of a town centre.**”*

“A sequential approach should be applied to selecting sites for new retail development. Only where it has been determined that there are no sites within a town centre or an edge-of-centre location by virtue of size, availability, accessibility, and feasibility, should an alternative out of centre site be considered”.

“Quantitative and qualitative need must, however, be examined as part of any proposed application which would be in an edge or out of centre location and/or not in accordance with retail strategy hierarchy alongside a full sequential test of the proposed location.”

*“There is in this strategy a general requirement to demonstrate ‘need’ for any retail development in edge or out of centre locations. In the normal course any additional floorspace should be directed towards improving/**extending existing centres where appropriate.**”*

The proposal is within walking distance of the ‘Urban Village’ (as per Draft City Plan) of Inchicore (zoned Z4) which is located adjacent to the subject site. A qualitative, quantitative, and sequential test has been conducted and shows that the proposed development is acceptable on site.

Regarding the size and retail uses within neighbourhood centres the strategy allows for a convenience retailer up to 2,500 sq. m. net and a range of supporting retail shops. The proposal provides for a convenience retail anchor (c.1,765 sq. m. net) 2 no. cafés (c. 280 sq. m) / as well as 5 no. retail/retail related services space (c. 564 sq. m.).

6.2 RELEVANT SECTION 28 GUIDELINES

6.2.1 Sustainable Residential Development in Urban Areas (2009)

The Sustainable Residential Development in Urban Areas (SRD) Guidelines provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. To assist with this, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- *Prioritise walking, cycling, and public transport, and minimise the need to use cars;*
- *Are easy to access for all users and to find one's way around;*
- *Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;*
- *Provide a mix of land uses to minimise transport demand.*

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

These Guidelines support a plan-led approach to development as provided for in the Planning and Development Act 2000. Section 2.1 of the Guidelines note that *'the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy'*.

Having regard to the above, the subject site is zoned Z14 in the current Dublin City Development Plan and the Draft Dublin City Plan.

The proposed development is therefore making the most efficient use of the subject land increasing residential development in an existing urban area and providing for higher density residential development (c. 155 units per hectare) in a key location well served by existing public transport and local services. The proposed development is therefore compliant with the guidelines in terms of the sequential development approach.

The SRD Guidelines note that *"Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally."*

We refer the Board to the enclosed Social Infrastructure Assessment prepared by John Spain Associates which sets out the wide-ranging variety of local services, including schools, health care services. The wider area of Inchicore has the capacity to accommodate the new residential community at Emmet Road.

The proposed development is located in close proximity to local services such as schools, local shops, and businesses. No particular capacity issues were found in respect of local primary

or secondary schools. It is noted the development includes mix of uses such as community hub/library, 5 no. retail/retail related service units (as well as a supermarket), a creche and 2 no. café/restaurants, which will broaden the community and retail facilities in the area.

Density

The subject lands are located adjacent to 'Public Transport Corridors' such as the Luas Red Line located to the south (c. 270m) as well as an existing bus corridor located along the northern boundary of the site at Emmet Road, in the context of the densities required under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). We refer the Board to Chapter 10 of the EIAR (Volume II), as well as the Mobility Management Plan (MMP) and Traffic and Transportation Report, prepared by OCSC Consulting engineers, submitted with this Part X application.

Section 5.8 of the Guidelines recommends that *'in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes'*.

In addition to recommending appropriate densities, the Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- *prioritise walking, cycling and public transport, and minimise car use;*
- *are easy to access for all users and to find one's way around;*
- *promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and*
- *provide a mix of land uses to minimise transport demand.*
- *Reduce traffic speeds in housing developments*

The layout is highly accessible for future occupants as well as the existing community and will promote a permeable layout throughout the site. The Part X application includes a Mobility Management Plan, prepared by OCSC Consulting Engineers, the aim of which is to prioritise sustainable modes of transport, over the motor car.

The Guidelines also provide advice on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines are accompanied by a Design Manual which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

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

The proposed development has had regard to the advice set down in the *'In Practice'* section of the Urban Design Manual (2009), which sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals.

Figure 6.3 – Urban Design Manual 12 criteria

Source: Urban Design Manual DoEHLG 2009

The Urban Design Manual is based around 12 criteria that have been drawn up to encapsulate the range of design considerations for residential development based on “a *distillation of current policy and guidance and tried and tested principles of good urban design.*” The 12 no. criteria are assessed as follows:

6.2.1.1.1 Context: How does the development respond to its surroundings?

The development design has taken cognisance of surrounding uses, providing for adequate setback, and buffering from adjacent residential and heritage properties (Richmond Barracks, a protected structure), and ameliorating risk of impact on the residential amenity of adjacent housing developments via the inclusion of generous separation distances.

Each of the 3 no. blocks provides variety in the scale and massing, which respond to their immediate context. The Design Statement by BMCEA, notes the following in relation to the siting of the blocks

- *The positioning of 5 storey blocks along the street edges of St Vincent Street West and Patriots Path, and the recessing of the 7 story blocks to establish a human-scaled, safe and inviting street-scape.*
- *Providing 5 story to 3 storey steps along the east-west street connecting Tyrone place to Richmond Barracks to vary the scale and provide visual variety.*

The axonometric diagram below illustrates how the overall perimeter blocks have been designed to ensure that the scale and massing is broken up and sits comfortably within the subject site.

Figure 6.4 – Proposed Heights

In addition, the inclusion of high-quality materials further reduces the scale and massing of the proposed development.

In addition, the existing sports centre, which is to be retained within the new urban precinct has been integrated into the design of the proposal. We refer the Board to the BMCEA Design Statement which provides more detail.

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

The Urban Design Manual notes that successful neighbourhoods *'tend to be well connected to places, facilities and amenities that help to support a good quality of life.'* The Urban Design Manual further notes that the quality and sustainability of a neighbourhood can be measured by *'how well it is connected to important amenities, and how pleasant, convenient and safe those links are to use.'* Positive indicators include attractive routes for pedestrians and cyclists; proximity to a mixed-use centre, layout facilitating a bus service, easy links to adjoining areas, and appropriate densities aiding the efficient provision of public transport.

A connected living community will be supported by a development that accommodates for diversity and inclusivity, providing a quality shared social realm that will encourage social cohesion and offer venues for the existing and future residential community of the site to thrive.

East west permeability is provided within the scheme, with active frontages included. Existing north south permeability is available along Patriot's Path and St. Vincent's Street West to the west.

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

According to the Urban Design Manual, inclusive design is defined as *'that which meets the needs of all users, regardless of age, gender, race or sensory and mobility abilities. In its broadest sense, it also means creating places that can be enjoyed by people from all cultural and socio-economic backgrounds.'*

The proposed development includes apartments which are suitable for mobility impaired persons. Landscape design by BLSA and detailing of roads and footpaths provide for movement throughout the development by mobility impaired persons, in compliance with Building Regulations Part M. Flexibility and ease of adaptability to meet people's changing

needs over time in a cost-effective way, without the need for re-location; offers a more attractive market proposition for the widest range of potential residents.

The overall development will include a mix of tenures comprising social housing and cost rental housing all providing an additional mix of residents from different socio-economic backgrounds.

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

The Urban Design Manual states that '*most successful and sustainable communities are ones that contain a good variety of things to do, see and enjoy. For large scale developments, this means providing a good mix of uses, housing facilities and amenities to engender a successful community.*'

The proposed development provides for a good mix of uses which include residential, cultural (community hub/library of c. 2,810 sq. m), as well as a creche (816 sq. m), supermarket, 5 no. retail/retail service-related units and 2 no. café units. In addition, the proposal includes a range of open space areas including public (3 no. main areas) as well as communal open space (for residents only) to serve the future residents of the scheme.

The proposed development provides communal amenity spaces centrally within the blocks, along with additional landscape amenity areas. This ensures that the development prioritises its use by residents and provides a high-quality landscaping scheme which includes easily navigable streets and public spaces which promotes social interaction and a range of passive and active recreation.

It is considered that the proposed development provides for the necessary ancillary land uses required for this residential development, whilst having regard to the significant range of community, commercial and social infrastructure in the Inchicore area.

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

The proposed development is classified as a site located within a public transport corridor by virtue of its location close to a LUAS stop (to the south) and proximity to the bus routes to the north on Emmet Road adjacent to the project site.

The density of c. 155 units per hectare (on the net site of 3.72 hectares) makes efficient use of the Z14 SDR lands, which is located within a public transport corridor with a wide range of public transport options (Luas and bus), while at the same time providing a range of uses and public open space areas (c. 19.4% of the site).

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

The minimisation of carparking and provision of undercroft parking in a mobility hub has allowed for more surface level space to be dedicated to open space and landscaping. This creates an attractive and active ground level, overlooked by the residential units above. This together creates a sense of space, place, and enclosure throughout the development site.

The apartment blocks are designed, coordinating with landscaping to create distinct character areas. The proposed layout will create a high quality and distinctive residential environment for future residents.

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

The proposed site layout plan provides for a legible, permeable, and distinctive layout, which prioritises pedestrian movement and seeks to reduce the presence of the private car. In addition, the majority of parking will be at undercroft level. This further reduces the number of active cars on the road and allows for more space to be allocated to people friendly open spaces with pedestrians the priority.

The structure of the Site Layout Plan is based on the principles of best practice urban design including permeability, connectivity and legibility as set out above. So as to ensure appropriate permeability, connectivity and passive surveillance, it is proposed to provide some openings into the historic wall associated with Richmond Barracks. Further detail is provided in chapter 14 of the EIAR (Volume II) as well as the Architectural Heritage Impact Assessment, (prepared by Blackwood Associates).

The internal layout has been designed with pedestrian and cyclists to the forefront and with traffic safety in mind. Reduction of vehicle speed is a fundamental principle behind the layout and the site includes shared surfaces and permeable paving to raise speed awareness and promote traffic calming – all in accordance with best practice (DMURS).

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

The layout and design of the proposed development has been influenced by the level of security and overlooking to be provided by the future residents. The design of the development has been carefully considered to ensure a high level of passive surveillance on both the areas of open space and public access areas. The siting, layout and design of the residential blocks provide for a frontage onto centrally located communal areas ensuring the provision of a safe, secure, and enjoyable residential development.

In addition, the public areas of open space are also well overlooked by the residential buildings, providing passive surveillance to the plaza on Emmet Road as well as to the front of Richmond Barracks and Goldenbridge open space to the south.

The location layout and usability of the proposed public open space areas are of a high quality and will contribute positively to the residential amenity of future residents. The open space provision for the entire scheme was carefully considered by the design team in an integrated approach.

6.2.1.2.3 Adaptability: How will the buildings cope with change?

Each of the proposed dwellings meets or exceeds the minimum standards for residential unit size as set out in the Dublin City Development Plan 2016-2022 and the Apartment Guidelines 2020. The development provides a mix of 1-, 2- and 3-bedroom apartment units.

The overall architectural style is contemporary and reflects the modern requirements to balance lighter, airier elevations with the need to satisfy energy reducing objectives. Similarly, all proposed house types incorporate generous space standards to provide for adaptable living requirements. A Building Lifecycle Report accompanies the application confirming the robustness of the materials in reducing future running costs.

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

Each dwelling is provided with an area of useable private open space which meets or exceeds the Urban Housing: Design Standards for New Apartments (2020) and Dublin City

Development Plan. All dwellings meet or exceed the Section 28 Apartment Guidelines unit size requirements. The design of dwellings has also had due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling.

The development provides for separation distances of 22m between the proposed apartment blocks between directly opposing windows. In this regard, reference should be made to Housing Quality Assessment prepared by BMCEA Architects, which contains a detailed appraisal of the standards achieved in the proposed development in meeting the space and amenity needs of future residents.

In summary, it is confirmed that each proposed residential unit has an area of useable private outdoor space as well as exceeding other relevant requirements.

6.2.1.2.5 Parking: How will the parking be secure and attractive?

The reduction in car parking is a core aspect of the project design. The objective in this instance is to balance the provision of car parking with the overall design objectives to ensure the most appropriate and efficient use of space.

The cycle parking strategy will generally seek to comply with the Design Standards for New Apartments 2020 as a minimum and build upon this as part of the overall mobility strategy by identifying effective and innovative options that can be incorporated into the design.

The proposal includes 106 no. car parking spaces comprising 50 no. car parking spaces for the residential and the remainder allocated to the other uses including accessible spaces car share spaces and 10% Electric Vehicle charging points. Some of the car parking spaces will be provided in a Village Mobility Hub located beneath the supermarket at undercroft level. Car parking spaces will also be located at surface level including adjacent to Goldenbridge Cemetery.

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

The design rationale from an urban design and architectural perspective is very carefully considered and is detailed in the Design Statement prepared by BMCEA Architects. The landscape design rationale is set out in the Landscape Masterplan and Rationale prepared by BSLA Landscape Architects.

The proposed landscaping aims to enhance the overall biodiversity and ecology of the area which will improve the overall character and visual amenity of the development. Full details on the rationale for the landscaping design can be found in the BSLA drawings and report which accompanies this application.

6.2.2 Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)

A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations in cities and town that may be suitable for apartment development as follows:

- *Central and/ or Accessible Urban Locations;*
- *Intermediate Urban Locations;*
- *Peripheral and/ or Less Accessible Urban Locations.*

The subject site is located within a Central and/or Accessible Urban Location as the existing Luas Red Line is located immediately south of the development site with the Drimnagh Stop located approximately 190m (3 minutes) walk away and accessible via footbridge over the canal. The Goldenbridge Stop is located approximately 350m (4 minutes) walk away via a fully accessible route over the at-grade lock gate bridge. In addition, there are several Dublin Bus services serving stops in the local area within an approximate 200m – 800m (2-10 minute) walk on Emmet Road. The Apartment Guidelines note that these locations are generally suitable for large scale apartment development and higher density developments. These locations are categorised as including the following:

- *Sites within walking distances (i.e., up to 15 minutes or 1,000-1500m), of principle city centres or significant employment locations, that may include hospitals and third level institutions;*
- *Sites within reasonable walking distance (i.e., up to 15 minutes or 1,000-1,500m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- *Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) of reasonably frequent (min 10 minute peak hour frequency) urban bus services.*

The Guidelines also note that the scale and extent of the development should increase where the site is strategically located near quality public transport hubs, service and urban amenities.

“The scale and extent of apartment development should increase in the relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services also particularly suited to apartments.”

The 2020 Apartment Guidelines state in relation to housing mix at paragraphs 2.6 to 2.17:

- *Two thirds of households added in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type.*
- *There is a deficit of approximately 150% in dwellings for 1-2 person homes when compared to the number of 1-2 person households.*
- *The 2016 census reveals that 1-2 person households now comprise a majority of households, with this trend set to continue, yet Ireland is an outlier in the EU, with only one quarter the EU average of apartments as a percentage of housing stock.*
- *While household size is decreasing, the percentage of elderly people (i.e., potential down-sizers) is increasing.*

Paragraph 2.14 states *“While making appropriate provision to meet housing need is the key consideration, viability must also be considered, especially where there is clear evidence available. For example, research work undertaken by the Department of Housing, Local Government and Heritage with input from industry and construction professionals analysing the cost of housing delivery, confirms that in a given apartment scheme that includes a proportion of three bedroom units, replacing these units to allow larger number of one- and two-bedroom units would, contribute to greater scheme viability.”*

This application is accompanied by a Housing Quality Assessment, prepared by BMCEA Architecture, which demonstrates that the proposed apartments and associated communal spaces conform to and exceed the standards set out within Sustainable Urban Housing: Design Standards for New Apartments 2020.

The following is noted with reference to the Specific Planning Policy Requirements (SPPRs):

6.2.2.1 Specific Planning Policy Requirement 1 (Mix)

Specific Planning Policy Requirement 1 (SPPR1) states that *'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).'*

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).

The Proposed development complies with SPPR 1 as it includes 48.8% studio apartments and 1 no. bedroom apartments.

Table 6.1 – Overall Apartments Mix

Unit type	Studio	1 bedroom	2 bedroom	3 bedroom	
Total	110	172	250	46	578
Overall Mix	19%	29.8%	43.3%	7.9%	100%

Source: BMCEA Schedule of Areas

6.2.2.2 Specific Planning Policy Requirement 2 (Small Urban Infill Sites)

Does not apply to the subject site.

6.2.2.3 Specific Planning Policy Requirement 3 (Minimum Areas)

SPPR 3 of the Apartment Guidelines 2020 state that the following minimum floor areas for apartments apply:

- 1 bedroom apartment Minimum 45 sq.m;
- 1 bedroom apartment Minimum 45 sq.m;
- 2-bedroom apartment Minimum 73 sq.m;
- 2-bedroom apartment Minimum 73 sq.m;
- 3-bedroom apartment Minimum 90 sq.m

The proposed development complies with the minimum apartment floor area requirements set out in SPPR 3. The drawings and HQA prepared by BMCEA Architects demonstrate that the proposed development complies and exceeds the standards outlined in the Sustainable Urban Housing: Design Standards for New Apartments 2020.

In addition, the Guidelines state that *'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%)*.

The proposed development complies with the above.

6.2.2.4 Specific Planning Policy Requirement 4 (Aspect)

SPPR4 of the Guidelines relates to the provision of dual aspect units and states the following:

“Specific Planning Policy Requirement 4

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

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.” (Emphasis added)

SPPR4 recommends ‘33% dual aspect apartments in a single scheme’ for central and accessible locations. The subject site is a “central and accessible location” and could provide 33% dual aspect. Notwithstanding this, through careful design, the proposed development includes 50.9% dual aspect units and is therefore in compliance with SPPR4.

6.2.2.5 Specific Planning Policy Requirement 5 (floor to ceiling heights)

The apartment blocks which include heights of 2.7m comply with the requirement for floor to ceiling heights of 2.7m at ground floor level.

6.2.2.6 Specific Planning Policy Requirement 6 (Max units per core)

SPPR 6 notes that a maximum of 12 apartments per core may be provided within apartment schemes. All of the Blocks comply with SPPR 6; providing not more than 8 units per core.

The Housing Quality Audit, prepared by BMCEA Architects demonstrates how the proposed apartments comply with appendix 1 of the Apartment Guidelines 2020 in respect of sizes of apartments, minimum aggregate floor areas, widths, storage, minimum private open space.

With reference to communal open space the proposed development would require a communal open space provision of 3,464 sq. m using the following calculations (as per appendix 1 of the Apartment Guidelines 2020):

Table 6.2 – Communal Open Space Requirement

Apartment Type	Communal Open Space Sq.m	No. of Units	Sq. m
Studio	4	110	440
1 bed	5	172	860
2 bed	7	250	1,750
3 bed	9	46	414
		578	3,464

Source: BMCEA Architects

The communal open space provided amounts to some 4,307 sq. m within the courtyards of the individual apartment buildings comprising 2,540 sq. m for Block A, 1,167 sq. m for Block B and 600 sq. m for the commercial mixed-use Block C.

6.2.2.7 SPPR 7, 8 and 9- Build to Rent and Shared Accommodation

The above SPPR's do not apply to the proposed development.

6.2.2.8 Parking

The 2020 Apartment Guidelines note that '*quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria*'.

The subject site is located in a Central and Accessible Location, which is described as:

"Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- Sites within walking distance (i.e., up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;
- Sites within reasonable walking distance (i.e., up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and
- 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.

With reference to the above locational criteria, the subject lands are located within c. 1.3km from the St. James' Hospital campus, within 500m of the Goldenbridge Luas stop and is adjacent to bus routes along Emmet Road.

Paragraph 4.19 of the Apartment Guidelines 2020 states that:

*In larger scale and higher density developments, comprising wholly of apartments in more **central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated** in certain circumstances. 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. (JSA emphasis added)*

Based on the location of the proposed development close to good high quality, frequency and capacity public transportation links, a reduced car parking provision of 50 car parking spaces is provided for the residential element of the scheme. We refer the Board to the Traffic and Transport Assessment prepared by OCSC for a justification of the parking provision for the proposed development. In addition, a comprehensive Mobility Management Plan prepared by OCSC is also included with the Part X application.

6.2.3 Urban Development and Building Height Guidelines (December 2018)

The Urban Development and Building Heights Guidelines were adopted in 2018 and set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040.

The Guidelines promote an increase in building height in the right locations and set out certain criteria and requirements for developments of increased height.

Paragraph 3.1 of the Guidelines states that:

“In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

The proposed development is on a site zoned for strategic, residential focused regeneration. The site is generally brownfield and is located in the central urban area of Dublin City. The site is located in close proximity to existing sustainable transport routes, and therefore has the capacity to deliver development of an increased height, and sustainable scale, in line with the principles of compact growth set out in the NPF.

“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?

The proposed development is in line with the requirements of the current Dublin City Development Plan 2016-2022. While the policies on building heights contained in this Plan are broadly consistent with the Urban Development and Building Height Guidelines, the current development plan does predate the adoption of these Guidelines. The proposed new Dublin City Development Plan 2022-2028, which is currently at Material Amendments stage, is consistent with the 2018 Building Height Guidelines, and, as set out below in the following section, the proposed development is in compliance the height policies contained in this proposed Development Plan.

“Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?”

Paragraph 3.2 of the Building Height Guidelines state that *“In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria;”*

6.2.3.1.1 Consideration of Criteria under Section 3.2 of the Building Height Guideline

While the proposed development is in compliance with the relevant provisions of both the draft Dublin City Development Plan 2016-2022 and the Draft Dublin City Development Plan 2022-2028, nevertheless, it is considered appropriate to set out compliance with the Building Height Guidelines. In response to section 3.2, it is considered that the proposed height of the development ranging from 2 no. storeys to 7 no. storeys on the subject site with the majority of the blocks being 5 or 7 no. storeys in height is acceptable having regard to the criteria as set out below.

6.2.3.1.2 The criteria for assessment of developments at the scale of the relevant city/ town

The guidelines set out the criteria for developments at the scale of the relevant city / town (underlined below) as follows:

The site is well served by public transport with high capacity, frequent service, and good links to other modes of public transport.

The subject lands are located within close proximity of a number of public transport options, with particular note of the following:

- Luas Red Line – Drimnagh stop is located c. 200m walk from the development boundary, with access facilitated by an existing pedestrian bridge;
- Luas Red Line – Goldenbridge stop is located c. 500m walk from the development boundary, accessed by an existing bridge which facilitates pedestrians and disabled users;
- The North Clondalkin Quality Bus Corridor – running along Emmet Road with bus stops immediately adjacent the development site served by Dublin Bus Routes 13, 40, 68 & 68x.

We refer the Board to the TTA prepared by OCSC which includes detail on public transport and capacity. The TTA outlines that there is an estimated maximum capacity for 8,730 rail trips and 9,500 bus trips during the peak morning period which is considered to represent the peak daily demand period. According to the report:

“In the context of the aforementioned bus and rail service capacity locally, the demand generated by the development equates to approximately 1.8% of the bus capacity and 1.2% of the rail capacity which is considered negligible.

Taking the above into consideration, there is considered to be sufficient capacity available in the local public transport network to cater for the estimated demand for the proposed development. It is further noted that there is flexibility with respect to these services to provide increased frequency should demand on a wider basis justify it through the provision of additional buses and trams on key routes by the respective service operators.”

Having regard to the above, the proposed development has access to and is in proximity to existing high quality, high frequency public transport options (Luas and bus).

Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

The scale of the proposed development is considered to integrate appropriately with its surroundings, whilst introducing an element of increased height. The scheme responds both to its existing and permitted / planned context, which will see the wider site develop as a new urban district at Emmet Road.

The accompanying contiguous elevations and sections provided by BMCEA Architects illustrate the proposed building height in the context of the existing urban environment.

The visual impacts of the proposal are discussed in greater detail in the accompanying Landscape and Visual Impact Appraisal by Modelworks (contained in Chapter 9 of the EIAR), which states:

“The proposed development is predicted to have only positive or neutral townscape and visual effects and can be considered an appropriate intervention in the townscape of Inchicore.”

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

The proposed development site is 3.72 ha (net) and is therefore a ‘larger urban redevelopment site’. The proposed development makes a positive contribution to place-making through a high-quality development which integrates with the existing development in the area.

The proposals also promote pedestrian linkages through the development with attractive public realm and open space surrounding the proposed buildings. This promotes public movement through the site and facilitates pedestrian desire lines through the site. The development creates visual interest at the site through a high-quality design creating visual interest in the streetscape.

In this regard, the proposals are considered to be of an appropriate scale, height and massing to complement the site context and existing urban form whilst successfully introducing a high-quality element of architecture to the site, making optimal use of the site within an SDRA, which both the existing Dublin City Development Plan and Draft Dublin City Development Plan, have identified for development.

6.2.3.1.1 At the Scale of District/Neighbourhood/Street

6.1 The guidelines set out the relevant criteria for district/ neighbourhood / street context, as defined below, as follows:

The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.

The proposed development will provide for high quality contemporary design at an appropriate urban location and make a significant positive contribution to the existing urban neighbourhood and streetscape at this location. The proposal includes the provision of 3 no. main public open space areas which includes a significant improvement to the public realm along the frontage at Emmet Road, as well including a series of residential buildings which will make a positive contribution to the urban neighbourhood and streetscape.

The sensitive design and scale of development is considered to make a positive contribution to the urban neighbourhood through the re-establishment of a building line and streetscape.

As detailed within the accompanying Photomontages by 3D Design Bureau and Visual Impact Assessment by Modelworks, the proposal visually integrates successfully with the surrounding urban landscape.

The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered;

The proposed development provides for a variety of building heights and forms within the scheme within the 2 no. residential courtyard buildings as well as the Mixed-Use Block C. The proposed use of materials and façade modulation provides for variety and visual interest to the scheme. The proposed development is divided into a number of separate Blocks within the courtyard areas which also creates an interesting site layout and ground floor spaces within

the development. It is therefore considered that the proposed development is not monolithic and avoids long interrupted walls of buildings.

The proposal introduces a series of residential apartment buildings with high quality materials which relate well to the site's location and the style and palette of neighbouring properties and the wider existing and permitted context. This approach also breaks up the scale and massing of the scheme, ensuring that it will be pleasing to the eye when viewed from a distance, as much as within the scheme itself.

No long, uninterrupted walls are proposed in the form of perimeter or slab blocks, as the scheme effectively varies in height, and steps to avoid any sense of monotony. Elevations have been carefully designed and introduce varied aspects, through recessed styles and elements stepped out from the dominant building lines. This provides variety and visual interest to the buildings. This is complemented by a high quality hard and soft landscaping scheme, as set out in the BSLA proposals, which further enhances the visual appeal of the proposals, as well as attracting public use and animation along the street frontages and within the internal courtyard and garden spaces.

The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)

As noted above, the proposal introduces a development which is compatible with its land use zoning and adjacent development. The scheme will contribute to the creation of a sense of place translated through high quality landscaping proposals which serve to enhance the experience of residents and visitors.

The height proposed makes optimal use of an underutilised area of land which benefits from a strategic location in Inchicore which is located adjacent to public transport options (and just 4km from Dublin city centre). The layout of the residential blocks contributes to the creation of a central courtyards which will function as a managed open space for residents. This contributes to a sense of place and benefits from passive surveillance from the residential buildings. The Site-Specific Flood Risk Assessment prepared by OCSC Consulting Engineers demonstrates the compliance of the scheme with "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009) and which concludes:

"A review of all available flood risk mapping, as discussed throughout this report, confirms that the proposed development avoids all predicted and identified fluvial and coastal flood risk extent i.e., is located within Flood Zone C.

Therefore, the proposed development is considered 'appropriate' for development, in accordance with The Planning System and Flood Risk Management (FRM), Guidelines.

It is further noted that the proposed development has been designed to provide sufficient surface water drainage infrastructure to ensure no pluvial flooding on site for all design rainfall events up to, and including, the 1% AEP. The proposed surface water drainage network has also been designed to attenuate all rainfall events to the greenfield equivalent runoff rates, so as to ensure no adverse impacts downstream as result of the proposed development. Refer to the Engineering Services Report, I262-OCSC-XX-XX-RP-C-0001, and associated design drawings for further details relating to the proposed surface water drainage network and management strategy.

Based on the above, and the detailed information contained within this SSFRA, there is no apparent flood risk to the proposed development, nor as a result of the proposed development."

The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.

The priority for the design team is to propose a pedestrian friendly series of streets and spaces whereby the proposed site layout plan provides for a legible, permeable and distinctive layout. The proposed layout of the development provides for a straightforward, easily accessible and easily navigable network of places for pedestrians and cyclists which integrates with the existing street layout at Emmet Road as well as along Patriot's Path and St. Vincent's Street West.

The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

The development will comprise 578 no. apartments, consisting of 110 no. studio apartments, 172 no. 1 bedroom apartments, 250 no. 2 bedroom apartments (including 10 no. duplex apartments) and 46 no. 3 bedroom apartments (all apartments to have balconies or terraces), community facilities community hub/library, Creche, supermarket, 5 no. units (retail/café/restaurant/class 2 financial services floorspace) & 2 no. café units), in a series of buildings of varying heights. The proposed development will broaden the mix of unit types in the area through the inclusion of apartments (studio, 1 bedroom, 2 bedroom and 3 bedroom units).

6.2.3.1.2 At the Scale of the Site/Building

The guidelines also set out the following criteria for developments at the scale of the site / building:

The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd Edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

The proposed scale, massing and height of the development has been informed by the existing, planned, and emerging built environment in the surrounding area. The development introduces a higher built element to the urban environment which seeks to optimise the site's location and position in proximity to public transport options.

We refer the Board to the IN2 Sunlight Daylight report which outlines that:

“According to the IN2 Sunlight Daylight report, “*The analysis determined that 99% of KLD and Bedrooms – 1386 of 1404 rooms- throughout the proposed development would achieve the SDA targets in terms of SDA compliance.*”

For access to daylight the IN2 Sunlight Daylight report confirms “*a high level of compliance for Exposure to Sunlight, 97% of the spaces assessed were determined to be compliant,*”

It is clear that there is a strong emphasis towards increased density and building height in appropriate locations within existing urban centres and in close proximity to public transport links within existing and emerging Government policy.

6.2.3.1.3 Specific Assessments

Specific assessment as set out in the Guidelines also include the following:

Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

We refer the Board to the report prepared by IN2 which concludes:

“*The analysis illustrated how conditions for pedestrians at ground level were predicted to be suitable for “Pedestrian Sitting/ Standing” across the majority of the area.*

The proposed landscaping design, particularly strategically placed trees, aids in mitigating against any potentially higher wind speeds at ground level. Trees located in the north outdoor amenity space are predicted to be effective in reducing local microclimatic wind effects, resulting in conditions predominantly for “Pedestrian Standing/Sitting” in accordance with the Lawson Criteria methodology. Additionally, the regions of accelerated wind speeds at the south of the site yielded similar results of having improved wind microclimate conditions.

All balconies within the proposed development were also analysed and predicted to be suitable for “Outdoor Dining/Pedestrian Sitting”, and therefore suitable to their intended use as private amenity spaces, without any wind mitigation measures.

All walkways are determined to be suitable for their intended use for “Pedestrian Walking” by the Lawson Criteria methodology utilised.

Therefore overall, as per the Urban Development and Building Heights Guidelines (2018), the analysis undertaken identified that the proposed development was determined to not unduly impact on the local wind microclimate, with no adverse wind effects such as down-draft effects predicted to be introduced to the receiving environment.”

In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.

We also refer the Board to the Biodiversity Chapter of the EIAR (Chapter 4) prepared by Enviroguide:

“*In conclusion the subject site had low levels of bat activity despite optimal weather while the cemetery had low to moderate levels with the majority in the southeast corner of the Goldenbridge Cemetery which is not within the development site.*

No activity was recorded across the green space that makes up the majority of the Site to the south. This is likely due to the lack of trees or shrubs which provide commuting and foraging habitat for bats. Similarly, no bats were recorded along the margins of the Site with the exception of 1 no. Soprano Pipistrelle recorded along the northern boundary adjacent to Emmet Road at 20:42pm. Public lighting along the margins of the Site was noted to be high with no suitable foraging/commuting habitat present.

The proposed public lighting plan will adhere to the various measures outlined in section **Error! Reference source not found.** above. These measures are in-keeping with the recommendations of the Bat Survey Report (AEE Ltd., 2022) and will serve to minimize the potential ecological impacts of glare, sky glow and obtrusive light (light spill). As such, taking the above into account as well as the existing baseline conditions at the Site (urban environment already subject to illumination) impacts to bats during the Operational Phase are neutral.”

“Based on initial site assessment/observations, expert opinion, and the findings of the survey itself; it is our considered professional opinion that the Site of the Proposed Development does not currently represent an important flyway for SCI species, with a lone occurrence of 230 Light-bellied brent geese in January 2022 and a single Oystercatcher in March 2022 being the only SCI waterfowl species recorded in flight over the Site. Furthermore, the Proposed Development entails building heights ranging from 1-7 storeys in height (max height 24m) and as such, the risk of migrating birds colliding with the structure due to its height is deemed to be negligible. Migrating species tend to commute far above this with Swans and Geese flying up to 2500ft (ca.750m) during migration along Irish Coasts (Irish Aviation Authority, 2020). Birds that fly over the Site to commute across the city or in order to reach feeding grounds at various locations would fly lower than these migration heights. However, even at these lower flight heights, once the proposed buildings are made of visible materials i.e., not entirely comprised of reflective materials such as glass, the birds would simply fly around or over them. The overall façades of the proposed structures are well broken up, with areas of glazing dispersed across a varied material composition. The opaque materials proposed, such as coloured brick and pre-cast concrete, provide important visible cues as to the presence and extent of the proposed structures to any commuting/foraging bird species should they be in the vicinity of the Site. The overall visual heterogeneity of the building façades will be sufficient to further ensure that the risk of bird collisions as a result of the Proposed Development is negligible. These architectural design features are part of the overall design of the Proposed Development and are not included as specific mitigation measures to prevent collisions, however, they will contribute to the overall effect in this regard.

Therefore, it is deemed that the Proposed Development will not have any significant adverse effects on these species in terms of flight-line obstruction going forward. The impact is described as neutral as per EPA (2022).

It is deemed that the Proposed Development will not have an impact on breeding birds during the Operational Phase.”

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

The proposed development is not located in a cluster of taller buildings. As such specific impact assessment such as telecommunications channels/microwave links are not required, in this instance, having regard to the fact that the proposal relates to a development of a range of heights from 2 to just 7 storeys

An assessment that the proposal maintains safe air navigation.

The proposed development is not located on a flight path to Dublin Airport and is significantly less than 45 metres in height. Therefore, the criterion is not relevant to this development as the Development Plan states *“The Irish Aviation must be notified in all cases where a proposed development exceeds 45m in height”*

Having regard to the modest height proposed (up to 7 storeys), the location of the site outside any aircraft and the wider context of the subject site, it is considered that there will not be an impact on air navigation.

An urban design statement including, as appropriate, impact on the historic built environment.

The application is accompanied by the following documentation of relevance to this requirement:

- 1) Architectural Design Statement prepared by BMCEA Architects
- 2) Landscape and Visual Impact Assessment (Chapter 9 of the EIAR) prepared by Modelworks and Photomontage Views Brochure, prepared by 3D Design.
- 4) Landscape Report prepared by BSLA Landscape Architects.
- 5) Architectural Heritage Impact Assessment prepared by Blackwood Associates.

Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.

As noted above, this application is accompanied by an AA Screening Report prepared by Enviroguide which concludes that:

“On the basis of this screening exercise, it can be concluded, based on the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required.”

In addition, an EIAR report has been prepared, and is submitted with the Part X application having regard to the number of units 578, which is above the mandatory threshold for EIA.

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

The Design Manual for Urban Roads and Streets (DMURS), 2013, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. We refer the Board to the DMURs compliance report prepared by OCSC which outlines that:

“the proposed development has incorporated a series of design measures to promote more sustainable modes of transport and support vulnerable road users which is in line with the core principles of DMURS and all other relevant guidance.”

6.2.5 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. While the Guidelines recommend that when considering planning applications, the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, this is not a mandatory requirement.

The 2001 Guidelines state (in relation to the recommendation) that:

“However, the threshold for such provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas, in consultation with city / county childcare committees. The location of childcare facilities should be easily accessible by parents, and the facility may be combined with other appropriate uses, such as places of employment.”

These Guidelines (currently under review) stipulate a requirement for a childcare facility within new housing areas at an average of *one childcare facility for each 75 dwellings (which is the equivalent to a minimum of 20 child places)*. **This is a guideline standard and will depend on the particular circumstances of each individual site.** (JSA emphasis added).

Further to this, the ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)’ state in relation to childcare facilities that ‘one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision **and subject to location, this may also apply in part or whole, to units with two or more bedrooms**’.

We refer the Board to Appendix 1 of the Community and Social Audit, prepared by John Spain Associates which includes a creche assessment. At the time of writing, within a radius of c.1.5 km from the subject site we noted 13 no. childcare facilities providing a range of services from full day to sessional for a range of age profile with a cumulative capacity for 643 no. children.

The childcare requirement on the basis of 1 facility catering for 20 places per 75 No. units (excluding studio and 1 bed units) would be 78 no. places. The proposed development of a creche/childcare facility of c. 816 sqm can cater for the proposed development (and 78 no. places). It is noted the layout provided by BMCEA is indicative and subject to change depending on the creche operator’s requirements and the number of children may increase (depending on mix of ages).

6.2.6 Draft Water Services Guidelines for Planning Authorities 2018

The Draft Water Services Guidelines for Planning Authorities were published in January 2018 by the DoHPLG, which sets out a clear structure for actively managing the interface between spatial planning and development and water services planning. The Water Services Guidelines for Planning Authorities have been prepared by the Department of Housing, Planning and Local Government in consultation with Irish Water.

The Guidelines provide best practice guidance in relation to the interface between planning and development functions provided by planning authorities and the delivery of public water services by Irish Water. Some water main upgrade works are required and are included within the application.

OCSC Consulting Engineers have consulted with Irish Water on the design of the development and a confirmation of feasibility is included with the Part X application particulars.

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

The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning System and Flood Risk Management Guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

In order to comply with these guidelines a Site-Specific Flood Risk Assessment has been prepared by OCSC Consulting Engineers which concludes that:

“Based on the above, and the detailed information contained within this SSFRA, there is no apparent flood risk to the proposed development, nor as a result of the proposed development.”

6.2.8 Retail Planning- Guidelines for Planning Authorities, 2012

The Department of Environment, Heritage and Local Government published new Retail Planning Guidelines in April 2012. The aim of the Guidelines is to ensure that the planning system continues to play a key role in supporting competitiveness in the retail sector for the benefit of the consumer in accordance with proper planning and sustainable development.

The Guidelines emphasise that enhancing the vitality and viability of city and town centres in all their functions through sequential development is an overarching objective in retail planning.

The Guidelines have five key policy objectives, namely:

- *Ensuring that retail development is plan-led.*
- *Promoting city/town centre vitality through a sequential approach to development.*
- *Securing competitiveness in the retail sector by actively enabling excellent quality development proposals to come forward in suitable locations.*
- *Facilitating a shift towards increased access to retailing by public transport, cycling and walking in accordance with the Smarter Travel Strategy; and*
- *Delivering quality urban design outcomes.*

The application site is located within Inchicore on Z14 zoned lands which comprise SDRA 9 Emmet Road. Specifically, the site is adjacent to the Neighbourhood Centre Z4 zoned area of Inchicore and therefore is designated as an edge of centre site. Additional Z3 lands are located on Emmet Road. We refer the Board to the Retail Impact Statement prepared by John Spain Associates, included with the Part X application, which sets out in detail how the scale of the quantum of the retail element of the proposed development is in accordance with the objectives of the Dublin City Development Plan 2016-2022 and the Draft Dublin City Development Plan 2022-2028.

The Dublin City Development Plan 2016-2022 and the Draft Dublin City Plan 2022-2028 sets out a vision for the future development of the SDRA 9 lands. Specific guiding principles which support the redevelopment of the site for mixed uses are provided and the proposed development is fully in accordance with these objectives as detailed within the Planning Report, prepared by John Spain Associates, submitted in with this Part X application.

The application site is located within Inchicore on Z14 zoned lands which comprise SDR A 9 Emmet Road. The site is located adjacent to the Neighbourhood Centre Z4 zoned area of Inchicore on Emmet Road and also adjacent to the Z3 neighbourhood zoning to the north and northeast of the subject lands along Emmet Road and therefore is designated as an edge of centre site.

Therefore, there is a requirement to apply the sequential approach to the proposed development. Appendix 1 of this RIS has undertaken a sequential test in the locality and there are no available, viable sites located between the subject site and the Urban Village of Inchicore. Having regard to the findings of the sequential test, it is considered that location of the proposed development is appropriate and satisfies the requirements of the sequential approach as set out in the Retail Planning Guidelines 2012.

A Retail Impact Statement (RIS), prepared by John Spain Associates, has been prepared and is included with the Part X application, which demonstrates compliance with the Retail Planning Guidelines including the sequential test.

6.2.9 Architectural Heritage Guidelines 2011

These Guidelines were published by the Department of the Environment, Heritage and Local Government originally in 2004, and reissued in 2011 following the transfer of functions to the Department of Arts, Heritage and the Gaeltacht. The Guidelines are issued under Section 28 of the Planning and Development Act 2000.

The proposal entails works to the protected wall in the northwestern corner of the subject site.

The impact of the proposed development on architectural heritage is assessed in Chapter 14 of the EIAR prepared by Blackwood Associates. A stand-alone Architectural Heritage Impact Assessment also prepared by Blackwood Associates, is also included with the Part X application

7.0 LOCAL PLANNING POLICY

7.1 DUBLIN CITY DEVELOPMENT PLAN 2016-2022

The subject site is located within the administrative boundary of Dublin City Council (DCC) and is therefore subject to the policies and objectives of the Dublin City Development Plan 2016-2022. The following sets out and assesses the proposed development in relation to policies, objectives and standards of the Dublin City Development Plan.

7.1.1 Core Strategy

The Vision and core strategy sets out that *“the ultimate purpose of the development plan is social, providing for people’s needs in all aspects of their lives and across their life cycle in areas such as housing, employment, recreation, social and commercial services, in a sustainable manner. This is reflected in the three principles of the core strategy and in every chapter of the development plan. The social purpose of the development plan is complemented by the Local Economic and Community Plan.”*

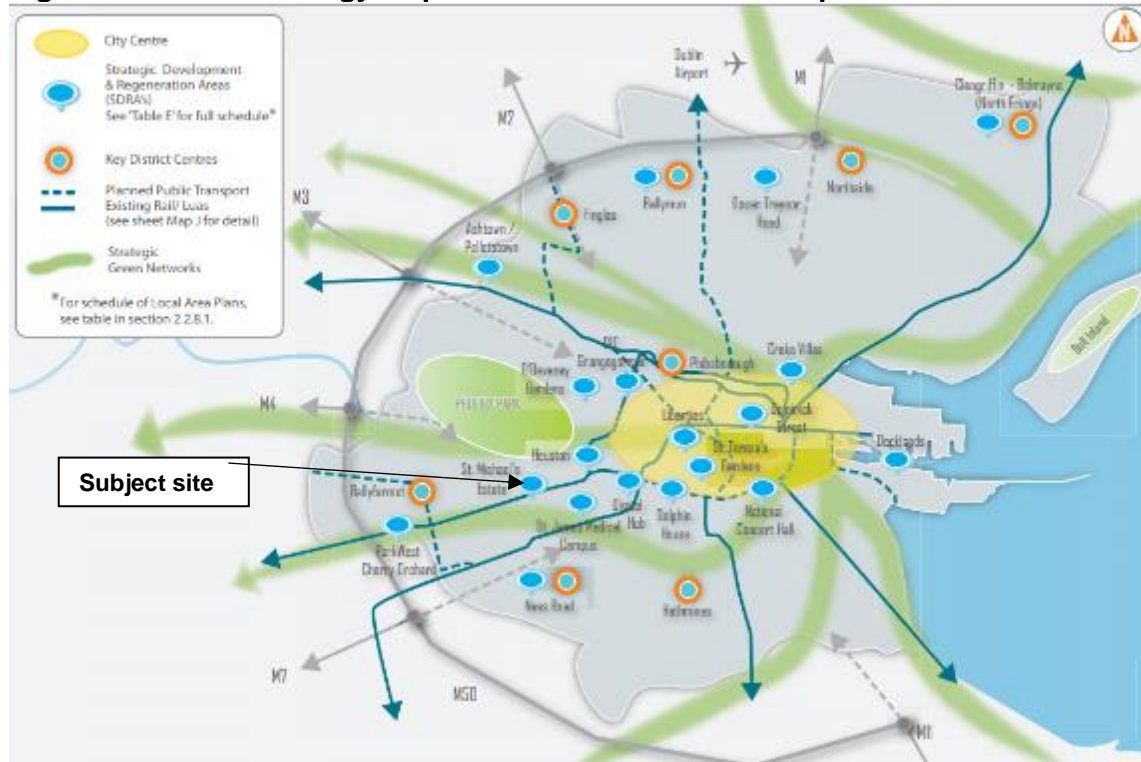
The core strategy sets out the housing requirement for 2016 to 2022, and following the recently adopted variation, part of the vision and core strategy of the Plan is to deliver between 21,939 to 26,439 new residential units in the period 2016 - 2022. This is to be achieved *‘in a variety of ways, including infill and brownfield development, regeneration and renewal of the inner city; redevelopment of strategic regeneration areas; and the encouragement of development at higher densities, especially in public transport catchments’* (Section 2.2.1 of the Plan).

Section 2.3 sets out three strands for guiding the plan:

- Compact, Quality, Green, Connected City
- A Prosperous, Enterprising, Creative City
- Creating Sustainable Neighbourhoods and Communities

Section 2.3.3 states *“consistent with creating a compact city and with Dublin’s role in the region, the continued, sustainable management of land zoned for housing is a central element of the core strategy. This will be done in a way that reduces urban sprawl and provides for a quality compact city of mixed-tenure neighbourhoods.”*

Section 2.3.4 states it is a priority *“to promote economic development, enterprise and employment generation in the city, consolidating and strengthening the role of Dublin as the main economic engine in the State and putting Dublin at the heart of the region.”*

Figure 7.1 – Core Strategy Map from the 2016-2022 Development Plan

Having regard to the above, it is submitted that the proposed development (identified above as an SDRA) is consistent with the core strategy of the City Plan 2016-2022 in terms of promoting mixed use development, increasing the intensity and density of the site in keeping with the objective to create a compact city.

7.1.2 Land Use Zoning Objective

The subject lands have a land-use zoning objective Z14, the objective of which is:

"To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and 'Z6' would be the predominant uses."

The Z14 'Permissible' uses are:

*"Betting office, buildings for the health, safety and welfare of the public; **childcare facility**, community facility, conference centre, **cultural/recreational building and uses**, education, embassy office, embassy residential, enterprise centre, green/clean industries, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, offices, **open space**, park and ride facility, part off-licence, place of public worship, public service installation, **residential**, **restaurant**, science and technology-based industry, **shop (neighbourhood)**, training centre."*

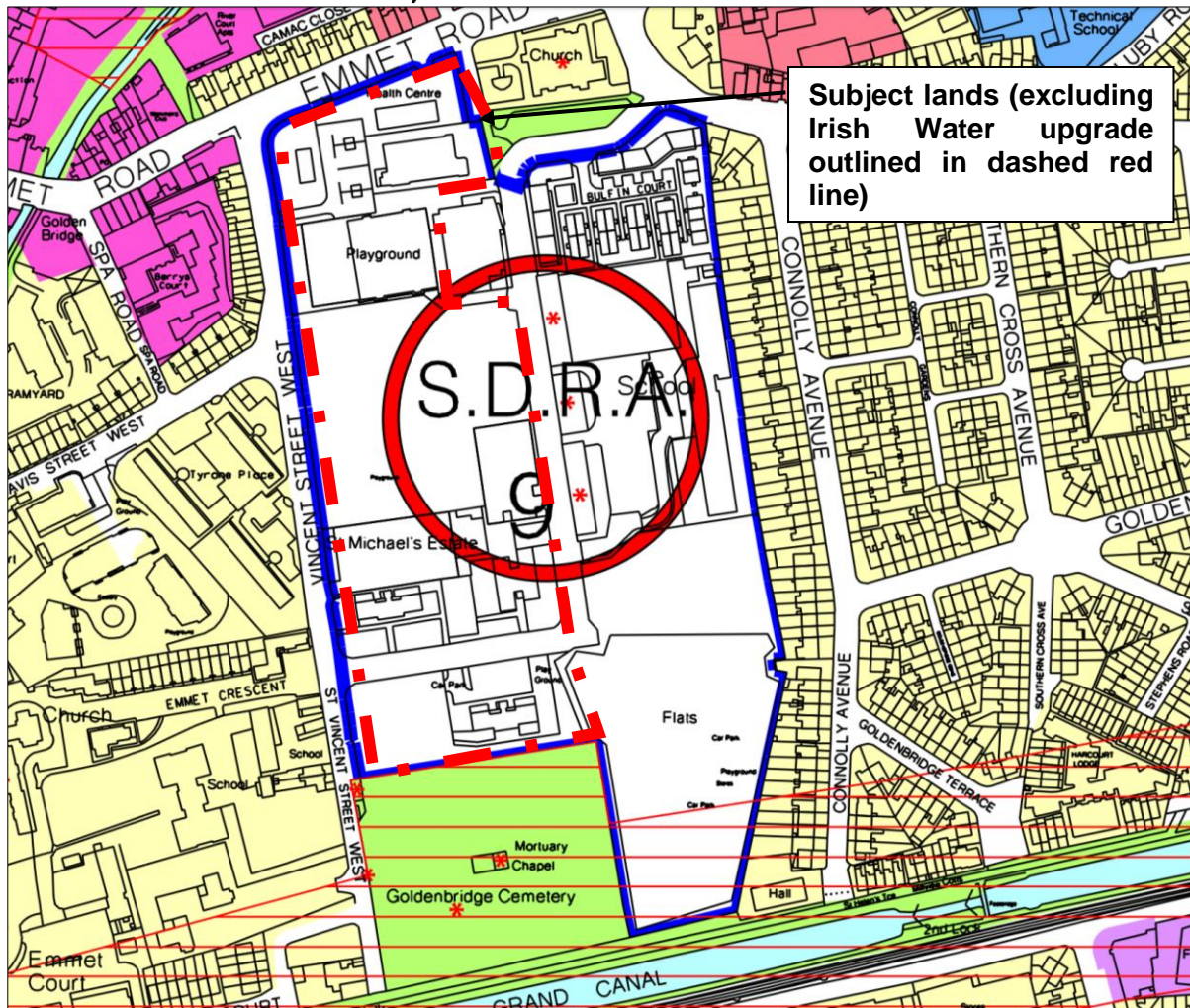
The Z14 'Open for Consideration' uses are:

"Advertisement and advertising structures, bed and breakfast, car park, car trading, civic and amenity/ recycling centre, factory shop, financial institution, funeral home, garage (motor repair/service), garden centre, golf course and clubhouse, hostel, internet café, nightclub, off-licence, outdoor poster advertising, petrol station, pigeon lofts, public house, take-away, veterinary surgery, warehousing (retail/non-food)/retail park, warehousing."

The City Plan notes that the Z14 areas are:

*“areas, including large-scale public housing areas, where proposals for comprehensive development or redevelopment have been, or are in the process of being prepared. These areas also have the capacity for a substantial amount of development in developing areas in the inner and outer city. **A number of the Z14 areas relate to important public housing regeneration areas and in the case of each, a number of development principles to guide the development of each area have been identified.**”*

Figure 7.2 – SDR 9. St Michael’s Estate (including adjoining Keogh Barracks/Richmond Barracks)



These development principles are set out in the guiding principles for strategic development and regeneration areas (SDRAs) (see Chapter 15 – Strategic Development and Regeneration Areas).

The City Plan notes that Z14 areas are capable of accommodating significant mixed-use development; therefore, developments must include proposals for additional physical and social infrastructure/facilities to support same.

The guiding principles for the remaining SDR 9 lands are set out below:

- ***The development of a high-quality, vibrant, mixed-use urban quarter will be promoted; new facilities will be located in accessible locations and will maximise the opportunities to connect with the wider neighbourhood.***

The development will comprise 578 no. apartments, consisting of 110 no. studio apartments, 172 no. 1 bedroom apartments, 250 no. 2 bedroom apartments (including 10 no. duplex apartments) and 46 no. 3 bedroom apartments (all apartments to have balconies or terraces), community facilities community hub/library, creche, supermarket, 5 no. units (retail/café/restaurant/class 2 financial services floorspace) & 2 no. café units), a public plaza fronting onto Emmet Road.

- ***The development will complement the regeneration of Inchicore by encouraging a natural extension of the village centre eastwards along Emmet Road; the development will provide strong connections between the site and the functions of the village centre, for which a local environmental improvements plan is proposed.***

The proposed development at Emmet Road will encourage the regeneration of Inchicore through the inclusion of a mixed-use area at the northern part of the site which includes a public open space along the frontage which will integrate with the existing village of Inchicore.

- ***The development of high-quality streetscape onto Emmet Road with accessible civic spaces, active frontages and an appropriate transition in scale, height and character between the village centre and the site will be promoted.***

The proposed development will provide a high-quality streetscape onto Emmet Road, through the inclusion of a substantial civic plaza as well as active frontages and a range of heights (mainly 5-7 storeys).

- ***Strong permeability will be sought through the site, including pedestrian and cyclist connections, to achieve strong north-to-south connections between Emmet Road and the Luas/ Grand Canal corridor and east-to west connections between St Vincent Street West and Bulfin Road; active streetscapes along these routes will be promoted.***

The proposed development includes permeability through the site, including east west connections, which will provide active frontages for passive surveillance. North south permeability is maintained along the east and western edges of the subject site along St. Vincent's Street West and Patriot's Path. North south permeability is also provided between the proposed community hub/library and Block C, which will integrate with the existing Inchicore Community Centre. Passive surveillance is provided through active frontages.

- ***Variety in housing tenures and unit types will be sought in order to achieve a balanced and sustainable community.***

The proposed development includes a mix of cost rental and social housing tenures with a wide range of unit types; all to provide a sustainable balanced in the proposed development.

- ***The important heritage features on, and adjoining, the site, shall be respected and highlighted by urban design with particular regard to the tourism, heritage, community and amenity value of assets such as St Michael's Church, Richmond Barracks, Goldenbridge Cemetery and the Grand Canal.***

The proposed development has been sensitively designed in terms of scale and massing, so as to take into account Richmond Barracks, Goldenbridge cemetery as well as St. Michael's Church.

- ***Innovative proposals that create a landmark destination within the city for combined facilities of a community, recreational, leisure and sports nature will be***

promoted; such facilities shall integrate positively with the existing sports facilities on site.

The proposed development includes a community hub/library which is located adjacent to the existing sports facility on the site.

- **The development of high-quality senior citizen housing. This will be located on the site between Thornton Heights and Richmond Barracks.**

It is noted there is a 52-no. unit senior citizen housing development permitted (on lands known as Site 1b St. Michael's Estate) adjacent to the subject site to the east under Planning Reg. Ref. 4260/19.

Figure 7.3 – SDRA 9 – St. Michael's Estate



(Note: Indicative Map only Figure 29 DCC City Plan)

7.1.3 Quality Housing and Sustainable Neighbourhoods

Section 2.3.3 of the Dublin City Development Plan 2016-2022 states that it is an objective of the council to create a quality compact city of mixed – tenure neighbourhoods, catering for a wide range of family types.

The proposed development at Emmet Road, comprising cost rental and social housing will broaden the range of tenure types in the environs of the subject site, which will cater for a range of family types and mix of units.

The Development Plan also notes that:

“Requiring apartment schemes to have good local facilities, and that large schemes are phased to ensure support infrastructure is provided in tandem with residential development, will assist in achieving this key strategy. An emphasis on effective property management for both apartment and housing complexes will also improve the quality of residential development”

The proposed development at Emmet Road is in close proximity to Inchicore village and its environs with a range of local services. The proposed development will provide a predominantly residential development in tandem with cultural (community hub/library) retail and childcare floorspace within a high-quality mixed-use development.

Section 5.5.2 of the Dublin City Development Plan 2016-2022 encourages sustainable residential areas. The City Plan states that *“building at higher densities makes more efficient use of land and energy resources, creating a consolidated urban form which fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure”*.

The City Plan seeks:

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

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

With reference to QH7 and QH8 above, the proposed density of 155 units per hectare is considered appropriate for the SDRA, as the subject site located in close proximity to public transport options (Luas to the south and Bus along Emmet Road) as well as a range of community and social infrastructure (as set out in the Community and Social Audit prepared by John Spain Associates, included with the Part X application. The design and layout of the proposed development has had regard to the surrounding character of the area, including Richmond Barracks, and provides a modest range of heights (predominately 5-7 storeys) in a series of 3 no. perimeter blocks.

It is the policy of Dublin City Council:

“QH12: To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new development throughout the city by requiring planning applications to be supported by

information indicating how the proposal has been designed in accordance with the development standards set out in the Development Plan.”

We refer the Board to the enclosed Energy Statement prepared by IN2 Consulting which sets out the improved energy performance of the proposed mixed-use development at Emmet Road. The Design Statement prepared by BMCEA sets out how the proposed development has been designed in accordance with the development standards of the City Plan.

7.1.4 Housing Strategy and Housing Mix (Appendix 2A)

According to the Housing Strategy, the mix of unit sizes may vary for social housing schemes where a particular housing need has been identified:

“Minimum standards for residential mix and unit size shall be in accordance with the residential standards set out in Chapter 16: Development Standards of the development plan. The mix of unit sizes may vary for social housing schemes where a particular housing need has been identified.”

The unit mix for the social units has been informed by the social housing requirements of Dublin County Council. The current social housing requirements for area J are provided in the Housing Report prepared by Hooke Mac Donald, included in the application. The social housing element of the proposed development (137 no. units) provides 61 no. 1 bedroom apartments (45%), 55 no. 2 bedroom apartments, and 21 no. 3 bedroom apartments (15%).

7.1.5 Retail Policies

Inchicore is identified in Table 7.1 of the City Plan as a Level 4 centre (Neighbourhood Centre and Local Centre) in the Retail Hierarchy.

It is the Objective of Dublin City Council:

“RDO1: To implement the retail hierarchy contained in the retail strategy of this development plan i.e., the city centre retail core, the district centres/urban villages, neighbourhood centres/shopping parades, local shops.”

It is the Policy of Dublin City Council:

“RD19: To promote the retail provision in the key district centres, district centres and neighbourhood centres, including the revitalisation of existing established centres (see Appendix 3 Retail Strategy).”

The proposed development provides for a mixed-use development at Emmet Road which will revitalise an underutilised site. The proposal is consistent with the above policies and objectives. The proposal provides primarily for a convenience retail unit which will support local and future population in the area.

7.1.5.1 Convenience Shopping

Section 7.6.5 of the City Plan recognises that the provision of good quality convenience, speciality and retail service shopping to cater for daily shopping needs is critical to attract and retain residents, especially families with children, as well as businesses in the inner city.

It is the Policy of Dublin City Council:

“RD20: To promote and facilitate the provision of accessible good quality convenience shopping with strong choice and competition within the inner-city area and to develop areas to ensure that adequate provision is made for the increased population now living in the city; to reduce the numbers travelling to outer suburbs to meet their convenience needs and to attract and retain families with children in the city, as set out in the retail strategy for the Greater Dublin Area.”

Inchicore is served by small scale convenience stores in the form of a Eurospar and Tesco Express. No ‘neighbourhood shop’ (comprising of a convenience shop of between 1,000-2,500 sq. m net, as defined in Appendix 15 of the City Plan) exist within Inchicore or its retail catchment detailed below. The largest convenience store within the catchment area is Tesco Express (310 sq. m.). An Aldi is currently located approximately 1.9km to the west of the subject site along Kylemore Road and a Dunnes Stores is located approx. 1.4km to the southeast of the subject site along Crumlin Road.

7.1.5.2 Appendix 3 DCC City Plan

Table 1 of the Retail Strategy outlines the Retail Hierarchy for the City from Level 1 (City Centre), Level 2 (Major Towns [none in DCC]), Level 3 (District Centres). In addition, the following are outlined:

“Level 4 Neighbourhood Centres Neighbourhood Centres These centres provide a local focus for the population and normally consist of one supermarket-sized development up to 2,500 sq.m net retail floorspace with a limited range of supporting shops such as a grocer or chemist and retail services like a hairdressers and other services such as post offices or health clinics grouped together.”

Table 2 of the Retail Strategy defines the following types of retail relevant to the subject lands:

“Neighbourhood Anchor Store 1,000–2,500 sq.m range Supermarket anchoring a neighbourhood centre.”

Inchicore is a Level 4 centre. The size of the proposed neighbourhood shop at 1,765 sq. m accords with Tables 1 & 2 of the retail strategy; by providing a Neighbourhood Anchor Store will enhance the retail provision for existing residents within Inchicore and the surrounding residential areas and the future residential population arising from the proposed 578 no. dwellings.

7.1.5.3 Strategic Development and Regeneration Areas (SDRAs)

In relation to SDRAs, the retail strategy for the Greater Dublin Area states that,

“It is important that where large areas of new housing are planned that new retail centres are provided in tandem with housing, at a scale appropriate to meet the regular convenience and lower order comparison shopping needs of these communities. It further states that in granting such development, cognisance should be taken of existing retail in other areas, but that retail provision in such growth areas should not be restricted based on permitted retail development in existing areas and the quantum set out in the regional strategy, emphasising instead the need for overall regard to patterns of sustainable travel and community viability. The retail strategy for Dublin City Council supports the national and regional policy approach to retail provision in growth areas. The main growth of developing areas for the lifetime of this development plan are identified as strategic development and regeneration areas (SDRAs) in the core strategy, such as the North Fringe, Pelletstown and the Naas Road.”

The plan seeks a natural extension of the existing village of Inchicore by providing a mixed-use component to the north of the subject lands. The guiding principles seek the following:

“The development of a high-quality, vibrant, mixed-use urban quarter will be promoted; new facilities will be in accessible locations and will maximise the opportunities to connect with the wider neighbourhood

The development will complement the regeneration of Inchicore by encouraging a natural extension of the village centre eastwards along Emmet Road; the development will provide strong connections between the site and the functions of the village centre, for which a local environmental improvements plan is proposed.”

The proposed development will provide a vibrant mixed use urban quarter with connections to Inchicore village.

7.1.6 Community Policies

7.1.6.1 A Good Urban Neighbourhood

It is the Policy of Dublin City Council:

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

SN2: To promote neighbourhood developments which build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places.”

The proposed Part X development will provide a range of housing within the scheme comprising cost rental and social housing and will result in a substantial physical improvement, and regeneration, to the subject site through the introduction of a high-quality designed scheme which includes a community hub, plaza and retail development along the northern frontage.

7.1.6.2 Making Sustainable Neighbourhoods

Section 12.5.2 of the City Plan states that new developments should contribute to the unique identities and sense of place in Dublin’s neighbourhoods and that there will be a requirement for all proposals to demonstrate a positive urban design response. Applications for large-scale proposals will need to include an Urban Design Statement.

It is the Policy of Dublin City Council:

“SN4: To have regard to the Department of Housing, Planning, Community and Local Government’s Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DCLG’s Design Manual for Urban Streets and Roads (DMURS), 2013 and the NTA’s Permeability Best Practice Guide, 2015, in the making of sustainable neighbourhoods. (www.environ.ie)”

A range of community facilities and infrastructure will be essential to support the emergence of sustainable neighbourhoods and communities throughout the city, especially in newly emerging or developing areas. The delivery and sustainable funding of such infrastructure will

be a key focus of the City Council with consideration of innovative mechanisms including strategic partnerships with the private sector, as well as government and state agencies, and implementation through the development management process.

It is the Policy of Dublin City Council:

“SN5: To ensure that applications for significant large new developments (over 50 units) are accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.

SN7: To support and encourage the future growth of a wide range of public, social and community services essential to local community life, and to promote and seek to provide multi-use, fit-for-purpose community facilities which are suitable for all ages and all abilities, are operated according to an effective and efficient management strategy, and which are accessible in terms of physical design, location, cost of use, and opening hours.

“SN17: To facilitate the provision in suitable locations of sustainable, fit-for-purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area.”

The proposal includes high quality neighbourhood/community facilities in the form of a significant and substantial community hub/library (c. 2,810 sq. m) as well as a creche (816 sq. m). A Community and Social Audit has been prepared by John Spain Associates and is included with the Part X application.

The proposed mixed-use development will regenerate the subject site and will provide a mix of uses including retail, café, cultural (community hub/library) as well as a creche and open space. A Social Infrastructure Assessment has been prepared by John Spain Associates and is included with the Part X application.

7.1.7 Sustainability

Policy QH12 of the City Development Plan notes that it is the policy of the City Council to:

“To promote more sustainable development through energy end use efficiency, increasing the use of renewable energy and improved energy performance of all new development throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with guiding principles and development standards set out in the development plan”.

The Part X application is supported by a number of reports demonstrating the sustainability of the development, including Energy Analysis Report, prepared by IN2 which outlines that *“the proposed heating strategy to utilise Air Source Heat Pumps for Emmet Rd. will achieve NZEB compliance and would be a suitable options for this development.”* The report also outlines *“the mechanical and electrical installations information used for the energy analysis undertaken for the Emmet Road development to determine Part L compliance. This includes recommendations for the minimum fabric and design parameters necessary to achieve compliance.”*

7.1.8 Shape and Structure of the City

The following policies are of relevance from Chapter 4 of the CDP:

“Policy SC7 To protect and enhance important views and view corridors into, out of and within the city and to protect existing landmarks and their prominence.”

The development accords with the above policies in relation to the shape and structure of the City. A Townscape, Landscape and Visual Impact Assessment is included in Chapter 9 Volume II of the Environmental Impact Assessment Report submitted with the application, prepared by Modelworks. This includes assessment of the townscape/landscape character of the area; the design quality of the proposed development; and the visual impact of the proposed development on the townscape receptors and from townscape views. The report provides a full assessment of verified views from closer and more distance locations. As part of this great consideration has been taken in limiting the effect of the proposed development on important views and view corridors.

The assessments show that the proposed development is of high-quality design and comprises a palette a palette of materials that promote its uniqueness and identity. The TVIA concludes that:

“The proposed development is predicted to have only positive or neutral townscape and visual effects and can be considered an appropriate intervention in the townscape of Inchicore.”

The development is therefore considered compliant with policy SC7.

“Policy SC17 To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city, having regard to the criteria and principles set out in Chapter 15 (Guiding Principles) and Chapter 16 (development standards). In particular, all new proposals must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas, open recreation areas and civic spaces of local and citywide importance.”

In accordance with Policy SC17, it is considered that the proposed development will make a positive contribution to the urban character of the city. We refer to the TVIA in Volume II of the EIAR which assesses this in more detail and identifies the proposed development would have a distinctive quality and improve the public realm, making a positive contribution to the area and urban character. The visual impact assessment in Chapter 9 of the EIAR demonstrates that the proposed development does not have a detrimental effect on strategic views and important visual corridors in central Dublin, owing to its relatively modest scale and high-quality design, whilst in more local, short-range views, the building will positively respond to its immediate context and enhance the streetscape along Emmet Road.

“Policy SC25 To promote development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture befitting the city’s environment and heritage and its diverse range of locally distinctive neighbourhoods, such that they positively contribute to the city’s built and natural environments. This relates to the design quality of general development across the city, with the aim of achieving excellence in the ordinary, and which includes the creation of new landmarks and public spaces where appropriate.”

“Policy SC26: to promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city’s acknowledged culture of enterprise and innovation, and which mitigates, and is resilient to, the impacts of climate change.”

With reference to the above, the proposed development will provide a locally distinctive neighbourhood which includes a new public open space along Emmet Road. The proposed development at Emmet Road presents a high quality contemporary architectural design and

which includes SUDs which will assist in mitigating the impacts on climate which is set out in the BMCEA Design Statement and the OCSC Engineering Services Report.

7.1.9 Movement and Transport

The following policies are of relevance from Chapter 8 of the City Development Plan:

Policy MT12: *“To improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all.”*

Furthermore, the development has sought to enhance permeability across the site, creating enhanced pedestrian and cycling accessibility through the improvement public realm.

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

We refer the Board to the enclosed Mobility Management Plan prepared by OCSC Consulting engineers which sets out a series of measures to encourage and promote sustainable travel patterns.

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

The proposed development is considered appropriated for reduced car parking provision. Further details are set out in the TIA and Mobility Management Plan submitted with the application, prepared by OCSC. The development site is situated within walking distance of existing high-quality bus and light rail services through Dublin City; these include bus services with a peak hour interval of 10 minutes, which are within a 5-minute walk. In addition, the site benefits from proximity to numerous amenities in the southwest inner-city neighbourhood of Inchicore.

The proposed development provides a reduced and sustainable level of car parking in compliance with the City Plan.

Policy MT19: *“To safeguard the residential parking component in mixed-use developments.”*

The proposal also includes 106 no. car parking spaces comprising 50 no. car parking spaces for the residential element of the proposed development and the remainder allocated to the other uses including accessible spaces car share spaces and 10% electric vehicle charging points. The car parking spaces will be predominantly provided in a “Village Mobility Hub” located beneath the supermarket. Car parking spaces will also be located adjacent to Goldenbridge Cemetery.

The TIA confirms that the proposed development can be supported by the existing road infrastructure, that the parking provision for the proposed development conforms to Local Authority and DoHPLG standards, and that the development access design and internal layout are fit for purpose and comply with the Design Manual for Urban Roads and Streets.

7.1.10 Climate Change

Chapter 3 sets out a number of policies and objectives in relation to Climate Change including:

Policy CC3 (as amended by Variation 7): *“To promote energy efficiency, energy conservation and the increased use of renewable energy in existing and new developments. All new buildings will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).”*

As set out in the IN2 Energy Analysis Report, *“the proposed heating strategy to utilise Air Source Heat Pumps for Emmet Rd. will achieve NZEB compliance and would be a suitable option for this development.”* The report also outlines *“the mechanical and electrical installations information used for the energy analysis undertaken for the Emmet Road development to determine Part L compliance. This includes recommendations for the minimum fabric and design parameters necessary to achieve compliance.”*

Policy CC4: *To encourage building layout and design which maximises daylight, natural ventilation, active transport and public transport use.*

The layout of the proposed development maximises daylight and the location of the proposed development will promote public transport usage which is located in close proximity to the north (Bus routes) and to the south in the form of the Luas. Active transport is encouraged through the provision of generous cycle provision (including cargo bike storage) comprising some 1,285 no spaces.

Objective CC015 (as amended by Variation 7): *To facilitate the provision of electricity charging infrastructure for electric vehicles in all new development and in the public realm.*

Objective CC016 (as inserted by Variation 7): *All new parking for new (or extensions to) housing, apartments and places of employment that provide car parking shall be electric charge enabled. Dublin City Council shall work closely with the ESB and other stakeholders to increase the number of EV charge points across the city. All new (or upgraded) commercially operated car parking developments shall be required to provide a minimum of 50% of spaces with EV charging facilities.*

E-charging points will be provided (10% of the residential car parking spaces), as this is a detailed design matter the details of the e-charging spaces can be submitted prior to commencement of development. All remaining spaces will be ‘future proofed’.

7.1.11 Sustainable Environmental Infrastructure

The following policies are of relevance from Chapter 9:

Policy SI13: *“To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exists or will become available within the life of a planning permission.”*

OCSC Consulting Engineers have consulted with Irish Water on the design of the development and a confirmation of Feasibility is included with the Part X application particulars.

Policy SI15: *“To minimise the risk of pluvial (intense rainfall) flooding in the city as far as is reasonably practicable and not to allow any development which would increase this risk.”*

Policy SI16: *“To minimise the flood risk in Dublin City from all other sources of flooding, including fluvial, reservoirs and dams and the piped water system.”*

In order to comply with these Guidelines a Site-Specific Flood Risk Assessment has been prepared by OCSC Consulting Engineers which concludes that:

“Based on the above, and the detailed information contained within this SSFRA, there is no apparent flood risk to the proposed development, nor as a result of the proposed development.”

Policy SI18: *“To require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works. The following measures will apply:*

- *The infiltration into the ground through the development of porous pavement such as permeable paving, swales, and detention basins*
- *The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands*
- *The slow-down of the movement of water.”*

The Engineering Services Report prepared by OCSC Consulting Engineers provides further details on the proposals for water supply and wastewater treatment, and compliance with the use of SUDS as part of the development.

Policy SI20: *“To prevent and minimise waste and to encourage and support material sorting and recycling.”*

Policy SI21: *“To minimise the amount of waste which cannot be prevented and ensure it is managed and treated without causing environmental pollution.”*

A Resource Waste Management Plan, and an Operational Waste Management Plan, prepared by Byrne Environmental are submitted with the application to prevent and minimise waste as part of the demolition, construction and operational phases as part of the development.

Policy SI26: *“To ensure that the design of external lighting proposals minimises light spillage or pollution in the surrounding environment and has due regard to the residential amenity of the surrounding area.”*

A Site Lighting Report prepared by IN2 is submitted with the application, and this includes a lighting scheme for the proposed development. Obtrusive light from floodlighting within the site boundary onto adjacent roads will be minimised. Potential problems from glare and over-illumination have been evaluated and addressed to ensure that the design intent includes for high quality optics coupled with aiming and commissioning to mitigate against potential light spill and sky glow issues, as part of the design process. The final specifications will be agreed with the Local Authority.

7.1.12 Climate

The following policies are of relevance from Chapter 10:

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

Policy GI4: *“To co-ordinate open space, biodiversity and flood management requirements, in progressing a green infrastructure network.”*

Policy GI5: *“To promote permeability through our green infrastructure for pedestrians and cyclists.”*

Policy GI9: *“To incorporate open space into the green infrastructure network for the city, providing a multi-functional role including urban drainage, flood management, biodiversity, outdoor recreation and carbon absorption.”*

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

Policy GI14: *“To promote the development of soft landscaping in public open spaces, where feasible, in accordance with the principles of Sustainable Urban Drainage Systems.”*

Policy GI33: *“To seek the provision of children’s play facilities in new residential developments. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.”*

The proposed development is considered compliant with the relevant green infrastructure policies outlined above.

Chapter 4- Biodiversity and the AA Screening Report, prepared by Enviroguide addresses the impact of the proposed development locally and in a wider context on biodiversity. Further details on how the development incorporates green infrastructure is set out in the Landscape Design Statement. As summarised in Section 3, the Landscape Masterplan creates a number of distinct public and communal open spaces and introduces new pedestrian streets connecting Patriot’s Path and St. Vincent’s Street West. The proposed plaza will form the frontage along Emmet Road with an active public realm and historical setting. Within the central spaces high quality open spaces is provided which caters for all residents to use and for children of all ages.

The landscaping proposals are coordinated and integrated with the sustainable drainage urban systems. The proposals include a series of green roofs and podiums and areas of hardscape at ground level, would drain toward areas of soft landscaping wherever possible. The capacity for attenuation within soil structure can be quantified for each of the areas (as with the green roofs), and when more water is experienced than can be absorbed, an overflow will bring water to the attenuation systems. Further details on the drainage proposals are set out in the Engineering Services Report prepared by OCCS Consulting Engineers.

7.1.13 Built Heritage and Culture

The following policies are of relevance:

Policy CHC1: *“To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.”*

Policy CHC1: *“To ensure that the special interest of protected structures is protected. Development will conserve and enhance Protected Structures and their curtilage.”*

The proposed development includes some interventions consisting of the introduction of openings and reduction in height into elements of the remainder of the protected wall which is associated with Richmond Barracks. The rationale is to provide additional permeability and visibility in the northwestern corner of the site so as to integration of the proposed new public space located at the Emmet Road to the remainder of the village of Inchicore. Currently the wall presents a defensive obstacle to achievement of good urban design. The interventions have been carefully considered by the Design Team in consultation with the Conservation

Department of Dublin City Council. It is considered that the special interest of the wall will be enhanced by its integration into the public realm proposed.

Policy CHC28: *“That Dublin City Council is committed to ensuring that there is a supply of workspaces for artists in the city. It is the policy of Dublin City Council to work with all private, public and cultural stakeholders in co-operation to ensure that artistic work space is a key element in all multiuse developments in the city, in particular ensuring there is provision for cultural and artistic space in developments.”*

The proposed development includes a community hub/library which provide an important community building for Inchicore. The internal layout includes a series of flexible floorspace which could be used for exhibitions etc.

Policy CHC31 (as amended by Variation 7): *“All large scale, mixed-use development (as defined by this development plan) of office or residential space will include cultural/artistic/community uses. Proposals of over 1,000 units and/or commercial developments in excess of 10,000 sq.m. or any mixed-use proposal that meets these thresholds individually or in combination; shall be accompanied by an audit of community and cultural facilities in the vicinity and demonstrate how the proposal can contribute to any identified shortfall in the area. The audit shall be undertaken in consultation with the Community Section and the Arts Office of Dublin City Council.”*

The proposed development includes a community hub/library which provide an important community building for Inchicore. In addition, we refer the Board to the Social Infrastructure Assessment prepared by John Spain Associates, which sets out the wide-ranging community facilities located within the wider area.

Policy CHC46: *“To encourage active uses of public spaces for the enjoyment of individuals, families and visitors to Dublin city and contribute to a sense of place by encouraging and facilitating the provision of fit-for-purpose, multi-functional outdoor spaces for festivals, events, public art, markets etc. in accessible, traditional and non-traditional locations.”*

Notwithstanding the good level of provision within the surrounding area, the opportunity for an enhancement of the local community, social, and cultural infrastructure of the area is achieved through the delivery of additional community benefits in the form of a community hub/library as well as a creche, and the provision of a series of public open spaces, which includes a public plaza at Emmet Road. The expansion of the community facilities has been identified and scoped via detailed consultation with the Planning Department and other relevant cultural departments of DCC. It is therefore considered the proposals comply with policy CHC 28 and CHC31.

7.1.14 Consistency with Built Heritage and Culture

An assessment of the effects on built heritage receptors is included in an Architectural Heritage Assessment, report prepared by Blackwood Associates, and also Chapter 14 of the EIAR, Volume 1. The AHIA outlines that:

“The main residual effect on the architectural heritage is the change of use of the large open site, much of which is occupied by the large green open space that once contained the former Richmond Barracks parade ground, the Keogh Square and later St. Michael’s Estate housing scheme. The views southwards towards Goldenbridge Cemetery along St. Vincent’s Street West and Patriots Path will be permanently obscured by the new development. The remaining section of the Boundary Wall will be permanently altered. Loss of fabric has to be balanced with overall amenity of the wall presentation – ability of the existing masonry, when modified, to contribute at ground and at roof level to overall positive visual and social amenity of the

scheme. Removal of connections to defensive barracks wall allows for more generous connections and visual spatial improvements at junctions. Existing historic buildings will remain a backdrop to new building to the west. Large green space to west of historic buildings will provide breathing space across Patriot's Path."

7.1.15 Sustainable Communities and Neighbourhoods

The following policies are of relevance:

"Policy SN4: To have regard to the Department of Housing, Planning, Community and Local Government's Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DCLG's Design Manual for Urban Streets and Roads (DMURS), 2013 and the NTA's Permeability Best Practice Guide, 2015, in the making of sustainable neighbourhoods. (www.environ.ie)."

Section 6 above sets out how the proposed development at Emmet Road complies with the relevant Section 28 Guidelines.

"Policy SN5: To ensure that applications for significant large new developments (over 50 units) are accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion."

The application is supported by a Community and Social Audit prepared by John Spain Associates. The wider area is served by a range of cultural and community uses. The surrounding area also benefits from other community, social, and religious infrastructure.

"Policy SN7: To support and encourage the future growth of a wide range of public, social and community services essential to local community life, and to promote and seek to provide multi-use, fit-for-purpose community facilities which are suitable for all ages and all abilities, are operated according to an effective and efficient management strategy, and which are accessible in terms of physical design, location, cost of use, and opening hours."

"Policy SN16: To ensure that the provision of strategic new community infrastructure complements the range of existing neighbourhood facilities and, where appropriate, is located at the interface between communities to facilitate access across a number of neighbourhood areas and greater integration between communities and to support the provision of community facilities which act as point of integration between residents of new and established communities within neighbourhoods."

"Policy SN17: To facilitate the provision in suitable locations of sustainable, fit-for-purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area."

With reference to the above, as discussed above, application is accompanied by a Social Infrastructure Assessment. In accordance with the above policies, the proposed development will enhance the site, by incorporating a mix of uses, including residential accommodation, community hub/library, a creche, and 3 no. areas of public open spaces. This will complement the existing range of community facilities and services in the local area.

7.1.16 Relevant Development Management Standards

Chapter 16 of the of the CDP includes development standards for various classes of development. Assessment of the proposed development in respect of the relevant standards are set out below.

7.1.16.1 Large Scale Development

Further details on the design evolution are set out in the Design Statement prepared by BMCEA Architects, however the proposals have incorporated the considerations set out in Section 16.2.2.1 of the CDP in relation to large scale development (urban design recommendations), including:

- *The proposed development has a distinctive quality and will improve the public realm, making a positive contribution to the area and urban character, creating new compositions and points of interest.*
- *It provides high quality new streets, squares and public spaces, and seeks to maximise accessibility enhancing the permeability across the site. This also considers future patterns of traffic and pedestrian movement.*
- *The proposal includes a mix of uses comprising residential, retail and cultural (library) uses, with complementary uses and facilities including café, creche,*
- *Planting and trees have formed an integral part of the landscape design.*
- *The proposals ensured they were sympathetic to the existing Richmond Barracks, and St. Michael's Church.*
- *It creates an easily understandable urban environment, including active building frontages with clearly defined edges and safe public routes throughout the development.*
- *The proposals ensure waste storage facilities, servicing and parking are sited and designed sensitively and located to minimise their visual impact and avoid any adverse impacts on users of streets in the surrounding neighbourhood.*

7.1.16.2 Landscaping

Section 16.3 of the CDP relates to landscaping, and that landscape design and maintenance plans will be regarded as an integral part of all development applications.

As referred to above, the landscaping proposals formed an integral part of the design process. The principles of the landscape design seek to provide new accessible routes through the development site, and create a framework of new, key spaces and landscape types for the various user groups. Further details are set out in the Landscape Design Statement and drawings prepared by BSLA.

7.1.16.3 Public Open Space

The proposed development accords with Section 16.3.4 in relation to public open space. A total of 0.72 hectares of public open space / public realm improvements is provided, which equates to c. 19.4% of the 3.72 hectare (net) mixed use site, thereby meeting and exceeding the 10% requirement specifically for residential schemes.

7.1.16.4 Density

Section 16.4 relates to density and sets out that all proposals for high densities must demonstrate how the proposal contributes to place-making and the identity of the area, as well

as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods.

The proposed residential density is 155 units per hectare (based on net area of 3.72 hectares, excluding watermain upgrade along Emmet Road). It is considered the proposals will contribute to place making and the identity of the area, through the inclusion of a high-quality mixed-use development. As discussed above the mix of uses proposed ensure there is sufficient community facilities and social infrastructure to support the development, which is detailed in the Community and Social Audit prepared by John Spain Associates included with the application.

7.1.16.5 Plot Ratio and Site Coverage

The Dublin City Council Development Plan 2016-2022 sets out an indicative plot ratio of 1.0-3.0 for lands with a Z14 zoning objective. The proposed development has a plot ratio of 1:1.53 (based on site of 3.72 ha.) which is in compliance with the City Plan.

The subject site also accords with Section 16.6 of the CDP which sets out an indicative site coverage of 50% for Z14. The proposed site coverage is 33.8 %, based on the net site area of 3.72 hectares.

7.1.17 Development Standards for Apartments

Section 16.10.1 sets out residential quality standards for apartments, including floor areas, mix of residential units, aspect, internal space, minimum bedroom floor areas, storage, private amenity space, and communal facilities. While these requirements have been superseded by S28 Ministerial Guidance (Apartment Guidelines 2020), the proposed development complies with the 2016-2022 Plan in respect of the standards, which are generally more onerous compared to the Apartment Guidelines. The HQA prepared by BMCEA provides detail on compliance with same.

7.1.18 Building Height

Section 16.7.2 of the Development Plan sets out 3 no. height category limits for the city, Low-rise, Mid-rise and High Rise. The site is located in the outer city (as per Map K of the City Plan), and within a 'Rail Hub1' area, being within 200m-500m of the Drimnagh Luas stop (to the south of the subject lands. Heights of up to 24m are allowable in this category (subject to other design standards).

The proposed development includes heights of between 3-7 storeys, which is in compliance with the building height strategy of the City Plan.

A number of policies are set out in the Dublin City Plan with regard to building height. These set out that an application for high buildings higher than the maximum set out will be subject to the provisions of an LAP, SDZ or SDRA.

It is policy of Dublin City Council:

“SC16: To recognise that Dublin City is fundamentally a low-rise city and that the intrinsic quality associated with this feature is protected whilst also recognising the potential and need

• ¹ Rail hubs are within 500 m of existing and proposed Luas, mainline, DART, DART Underground and Metro stations.

for taller buildings in a limited number of locations subject to the provisions of a relevant LAP, SDZ or within the designated strategic development regeneration area (SDRA).

SC17: To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city, having regard to the criteria and principles set out in chapter 15 (guiding Principles) and Chapter 16 (development standards). In particular, all new proposals must demonstrate sensitivity to the historic city centre, the river Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas, open recreation areas and civic spaces of local and citywide importance.

SC18: To promote a coordinated approach to the provision of tall buildings through local area plans, strategic development zones and the strategic development and regeneration areas principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline.”

The proposed development includes heights of between 3-7 storeys and is compliant with the height provisions of the current City Plan. The SDRA9 for Emmet Road does not allow heights over and above the height provisions of the City Plan.

7.1.18.1 Development Standards for Apartments

Section 16.10.1 sets out residential quality standards for apartments, including floor areas, mix of residential units, aspect, internal space, minimum bedroom floor areas, storage, private amenity space, and communal facilities. However, these requirements have been superseded by the relevant SPPRs of S28 Ministerial Guidance entitled Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities 2020. Further details on compliance with the Apartment Standards are set out in Section 6.2.

The BMCEA Housing Quality Assessment sets out how the apartments comply with the current City Plan.

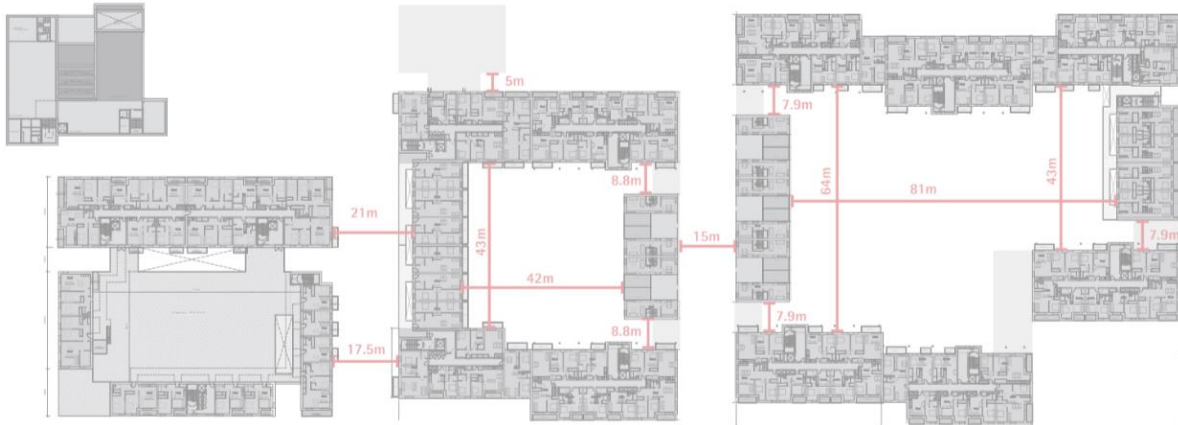
7.1.18.2 Residential Amenity

Section 16.10.2 of the plan refers to houses and states that at the rear of dwellings there should be adequate separation between opposing first floor windows. Traditionally, a separation of about 22m was sought between the rear of 2-storey dwellings but this may be relaxed if it can be demonstrated that the development is designed in such a way as to preserve the amenities and privacy of adjacent occupiers.

It should be noted that the Guidelines on ‘Sustainable Residential Development in Urban Areas’ also states the following in Section 6.10:

‘... While a 22 metre separation distance between opposing above ground floor windows is normally recommended for privacy reasons, this may be impractical and incompatible with infill development. In these cases, innovation and flexibility will be essential in the interpretation of standards so that they do not become inflexible obstacles to the achievement of an attractive village and small town character in new development’.

The submitted drawings by BMCEA Architects demonstrates separation distance at ground floor level. Where the distances are below 22m the design avoids direct windows facing each other.



The design also ensures an acceptable level of amenity for future occupants. The Daylight and Sunlight Assessment, prepared by IN2 sets out compliance with BRE 2022 which states

According to the IN2 Sunlight Daylight report, *“The analysis determined that 99% of KLD and Bedrooms – 1386 of 1404 rooms- throughout the proposed development would achieve the SDA targets in terms of SDA compliance.”*

For access to daylight the IN2 Sunlight Daylight report confirms *“a high level of compliance for Exposure to Sunlight, 97% of the spaces assessed were determined to be compliant,”*

7.1.19 Standards for Residential Accommodation

Section 16.10 of the City Plan sets out the standards for residential accommodation. The standards for apartment developments are set out in the Department of Environment, Community and Local Government guidelines entitled Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (December 2015).

With reference to the mix in apartment developments, the City Plan notes that each apartment development shall contain a maximum of 25-30% one bedroom units and a minimum of 15% three or more bedroom units.

However, the City Plan also highlights that:

*“These maximum and minimum requirements apply to proposals of 15 units or more **and may not apply to certain social housing needs** and/or where there is a need for a particular form of housing for older people and students having regard to the housing strategy.”*

In this regard Dublin City Council has identified a specific social housing need for 1- and 2-bedroom apartment units in the area. This is further detailed in Appendix 1 of this report.

7.1.19.1 Social and Community Audit

Section 16.10.4 requires proposals in excess of 50 units or 5,000 sq.m or above will be required to submit an audit of existing facilities within the area and to demonstrate how the proposal will contribute to the range of supporting community infrastructure. In addition, we note the content of Variation 7 to the Dublin City Development Plan 2016-2022, adopted by the Council in March 2020, which inserted text at the end of Policy CHC31 of the Development Plan, stating that *“Proposals of over 1,000 units and/or commercial developments in excess of*

10,000 sq.m. or any mixed use proposal that meets these thresholds individually or in combination; shall be accompanied by an audit of community and cultural facilities in the vicinity and demonstrate how the proposal can contribute to any identified shortfall in the area. The audit shall be undertaken in consultation with the Community Section and the Arts Office of Dublin City Council.”

As set out above, a Social Infrastructure Assessment is submitted with the application demonstrating the excellent availability of existing facilities within the area, including healthcare, schools, green parks and recreation, and how the proposal will contribute to the range of supporting social, community and cultural infrastructure. In addition, residential, retail, childcare and cultural (community hub/library) uses, the proposals will significantly enhance the immediate area of the site, including improvements to the public realm along Emmet Road, enhanced permeability across the site.

7.1.19.2 Mixed-use Development

Section 16.10.11 relates to mixed use developments, and that to create a vibrant city it is important that development accommodates a mix of uses. In considering proposals for mixed-use developments, the protection of amenity and the reduction in potential conflict between the various uses will be of paramount importance.

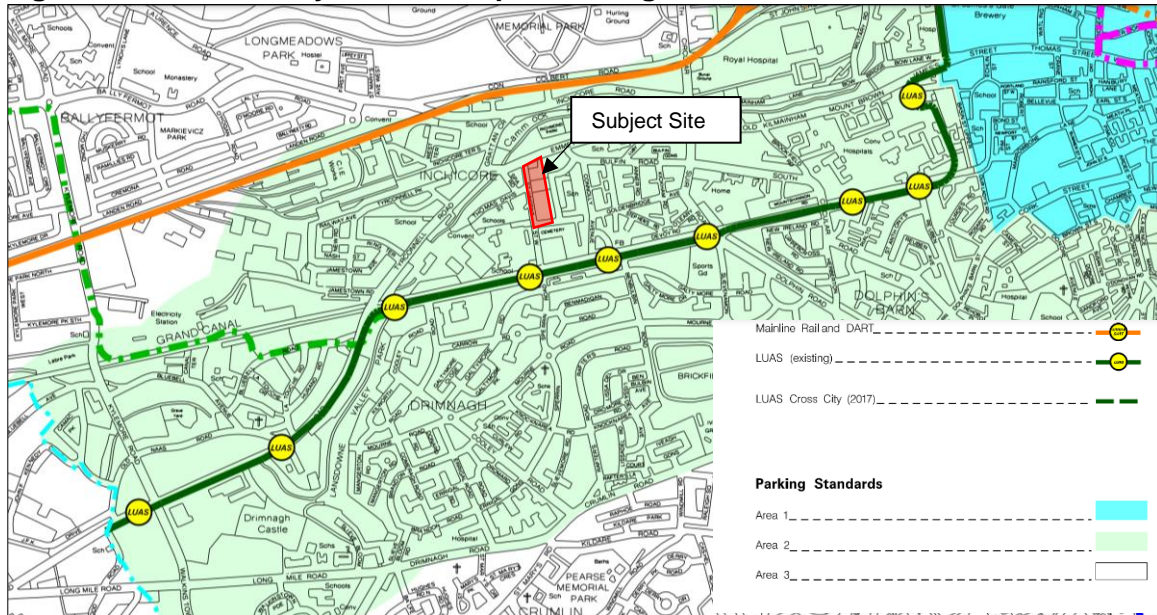
As set out above, the proposals include a mix of uses that will create a vibrant experience. The design has sought to ensure the protection of amenity and reduction in potential conflict. Further details are set out in the Design Statement and drawings by BMCEA Architects

7.1.20 Car Parking/Cycle Parking Standards

The subject site is located in parking Zone 2. The City Development Plan sets out maximum standards only of 1 space maximum per dwelling in this location. In terms of bicycle parking, the standard is 1 space per dwelling. For retail floorspace greater than 1,000 sq. m GFA 1 car space per 100 sq. m is required. For cultural and recreational buildings, 1 space per 250 sq. m is required. Car parking standards are maximum.

The Apartment Guidelines 2020 also set out specific requirements for car and cycle parking. In relation to carparking, it states that; *“In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.”*

The provision of reduced car parking spaces in a location served by high quality facilities in close proximity to the development would encourage sustainable modes of transport to be utilised in place of the private motor vehicle to avail of the services nearby. The shift towards reduced car parking or “*car free*” developments should therefore be actively encouraged in such locations and the subject site.

Figure 7.4 – Dublin City Council Map K Parking Zones

Bicycle Parking

Cycle parking standards in Zone 2 are set out in Table 16.2 of the 2016 City Development Plan and are as follows:

- *Residential (houses and apartments) – 1 per unit (additional requirements for larger units and visitor parking will be decided on a case-by-case basis)*
- *Cafés 1 per 150 sq. m.*
- *Shops 1 per 150 sq. m.*
- *Cultural and recreational buildings 1 per 150 sq. m.*

The proposal also includes 106 no. car parking spaces comprising 50 no. car parking spaces for the residential and the remainder allocated to the other uses including accessible spaces car share spaces and 10% Electric Vehicle charging points. The village car parking spaces (54 no.) will be predominantly provided in a Village Mobility Hub located beneath the supermarket. Car parking spaces will also be located adjacent to Goldenbridge Cemetery (2 no.).

Play Spaces

Section 16.15 provides further details on play spaces. This includes that spaces for small children should be provide close to the residential units and should have sunny and shady parts and be equipped with natural play elements and apparatus for swinging, climbing and rocking.

The proposed development includes an area of play that caters for children of all ages. This is considered appropriate due to the proportion of studio and one-bedroom apartments within the proposed development, it would be expected that the population of the development will instead have a much higher proportion of adults across all age ranges. Please refer to BMCEA inputs for further detail on the landscape design and strategy.

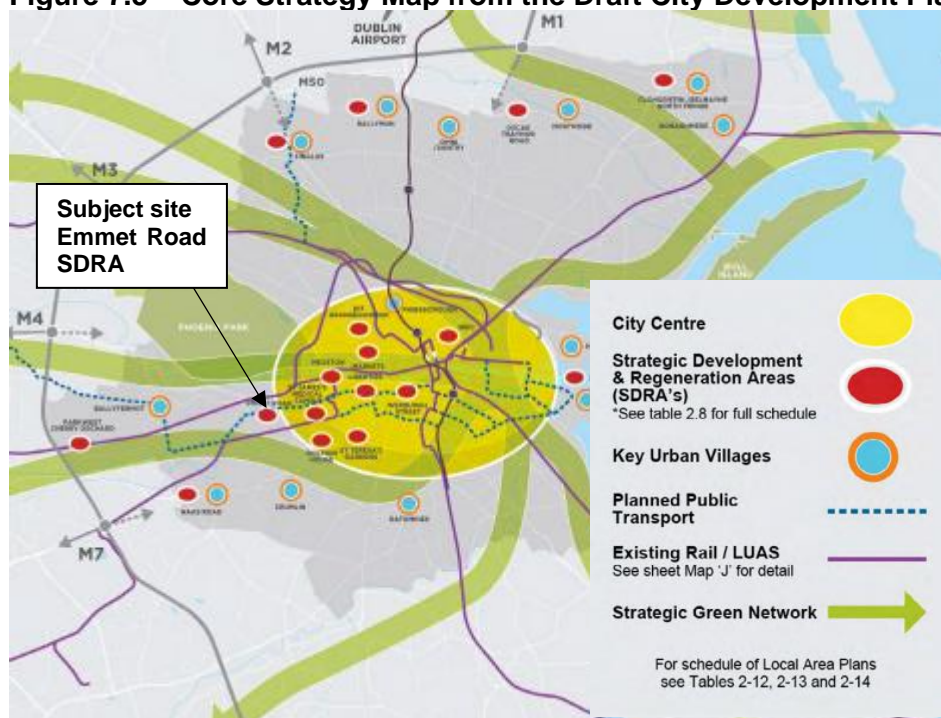
7.2 DRAFT DUBLIN CITY DEVELOPMENT 2022-2028

The Dublin City Development plan 2022-2028 is currently at a draft stage (“Draft City Plan”). A review of the Draft City Plan (including proposed material amendments outlined in **red** and **green** text) has been undertaken as the 2022-2028 Dublin City Plan will be in place when the Board makes a decision on the proposed development.

7.2.1 Core Strategy

The Draft City Plan states that, “Based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the development plan must accommodate between ~~(21,350 – 31,450)~~ **{20,120 – 31,520}** additional persons up to an overall population target of between 625,750 and 640,000 by 2028.”

Figure 7.5 – Core Strategy Map from the Draft City Development Plan 2022-2028



The Draft City Plan seeks to implement a core strategy that continues to build mixed use communities within the city that can sustain and grow a low carbon society by providing for housing in locations that fully support sustainable forms of development and allow large numbers of people live, move and work in a way that limits their carbon footprint. The Draft City Plan notes that City life provides the critical mass that creates the opportunity for people to engage with a wide range of services and social opportunities as well as a work location all within distances that are well served by high quality public transport, premium cycle routes and attractive public realm.

In terms of delivery, the SDRA lands are noted as being “critical to the core strategy”. The Planning Authority focus is on the on the 17 no. Strategic Development Regeneration Areas (SDRA) which will be prioritised for development over the development plan period.

The SDRA lands are critical to the core Strategy. All SDRAs (both new and previously identified) have been examined to determine capacity for future housing growth, taking into account sustainable densities and relevant SDZs and LAPs where relevant. **{This detailed assessment gave a potential yield from the 17 SDRAs of between 34,750 – 35,950 new**

dwelling on approximately 358 hectares. (Table 13-1 in Chapter 13 shows a breakdown of these figures by individual SDRA).}

Table 2.8 of the Draft City Plan indicates a proposed residential yield of c. 1,050 dwellings and an estimated population of some 2,100 across the SDRA 9 Emmet Road (see section 7.2.15 below for further detail on extent on lands of c. 15 hectares). While there was a BTR development of 365 no. units permitted under the current Plan (303435-19), there are no other large scale residential applications located within the SDRA currently in the system or permitted that would contribute towards the achievement of the residential yield. There is a small application for 12 no. apartments to the west (PRR 4545/22 at further information at the time of writing).

7.2.2 Land Use Zoning Objective

The subject lands have a Land-Use Zoning Objective Z14. The Draft City Plan notes that these lands:

“Are areas where proposals for substantial, comprehensive development or re-development have been, or are in the process of being prepared. A number of the Z14 areas relate to important public housing regeneration areas and others relate to former brownfield lands with capacity for significant redevelopment. A number of sites that are zoned Z14 are also identified as Strategic Development Regeneration Areas. Development principles to guide the development of each these SDRAs are set out in Chapter 13. It should be noted that some of the SDRAs have existing LAPs and SDZ Planning Schemes to guide their development and regeneration. Z14 areas are capable of accommodating significant mixed-use development, of which residential would be the predominant use; therefore, developments must include proposals for additional physical and social infrastructure/facilities to support same”.

The objective of these Z14 lands is:

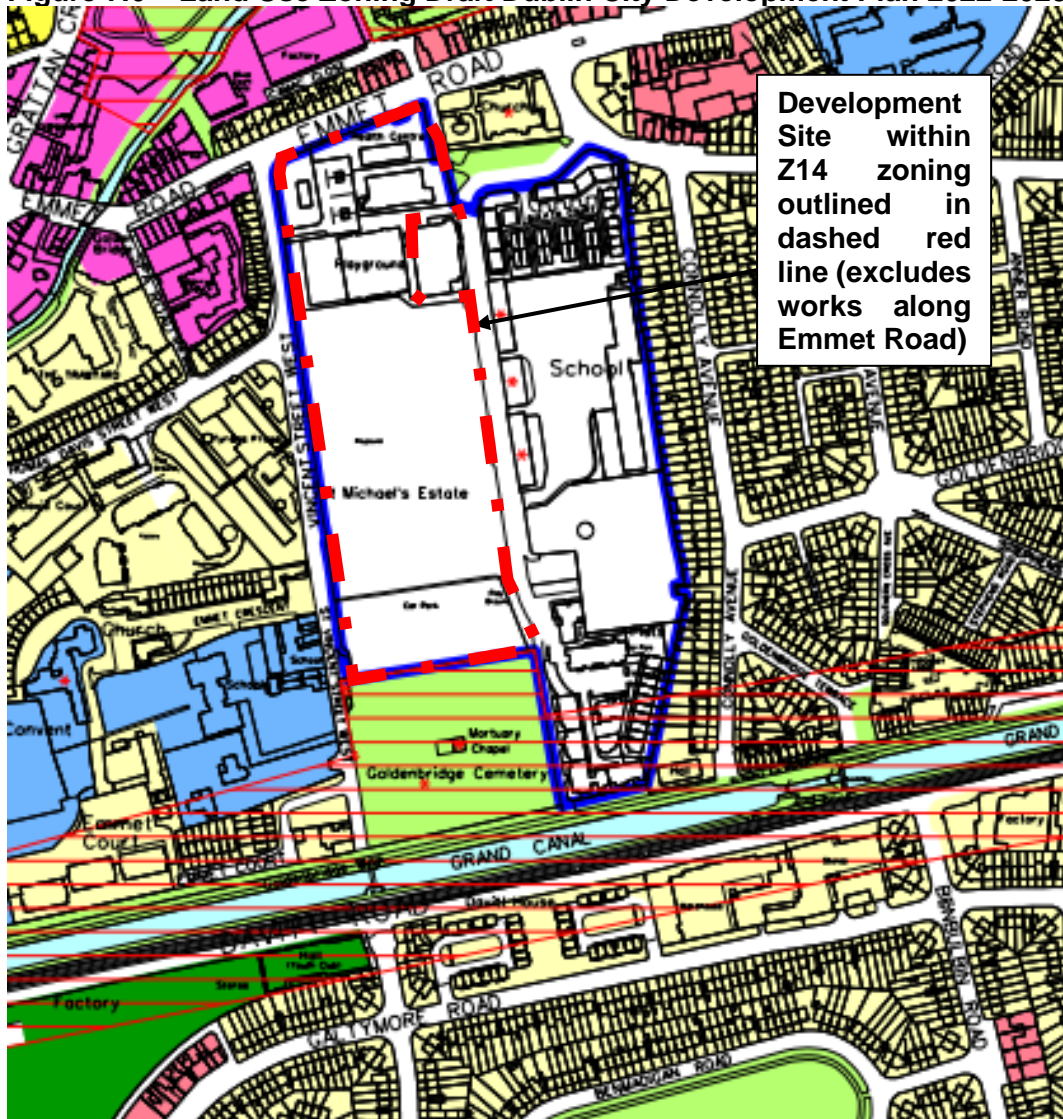
“To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use”.

The Z14 ‘permissible’ uses are:

*“Assisted living/retirement home, beauty/ grooming services, bed and breakfast, buildings for the health, **{Build To Rent residential,}** safety and welfare of the public, **café/ tearoom, childcare facility,** community facility, conference centre, craft centre/ craft shop, cultural/recreational building and uses, delicatessen, education, embassy office, embassy residential, enterprise centre, financial institution, guesthouse, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, **mobility hub,** office, off-licence, off licence (part), **open space,** park and ride facility, place of public worship, primary health care centre, public house, public service installation, **residential,** restaurant, science and technology-based industry, **shop (local), shop (neighbourhood),** sports facility, student accommodation, take-away, training centre, veterinary surgery.”*

The proposed uses which comprise residential, supermarket (shop neighbourhood), community hub/library, creche and open space are ‘permissible’ uses. The proposed development includes proposals for additional physical and social infrastructure to support the residential development.

Figure 7.6 – Land Use Zoning Draft Dublin City Development Plan 2022-2028



The Z14 'open for consideration' uses are:

“Advertisement and advertising structures, betting office, Build To Rent residential, car park ancillary to main use, car trading, civic and amenity/recycling centre, cultural, creative and artistic enterprises and uses, funeral home, garage (motor repair/service), garden centre/ plant nursery, hostel (tourist), internet café/call centre, laundromat, nightclub, office-based industry, outdoor poster advertising, petrol station, pigeon lofts, postal hotel/motel, shop (district), shop (factory shop), warehousing (retail/non-food)/retail park, warehousing.”

It is noted 'Shop neighbourhood' is defined in Appendix 15 of the Draft City Plan as follows:

“Shop: Neighbourhood A neighbourhood shop is one which primarily serves a local community and does not generally attract business from outside that community. They will primarily serve a 'walk-in' population and have limited car parking. A neighbourhood shop may include a supermarket or discount food store ranging in size from 1,000 sq. m to 2,500 sq. m. net retail floorspace.”

The proposed neighbourhood shop (1,765 sq. m net) will serve the local community and the floorspace is within the range indicated above in the Draft City Plan. The retail catchment illustrated in Section 6 below shows that the catchment is very much intended to serve the

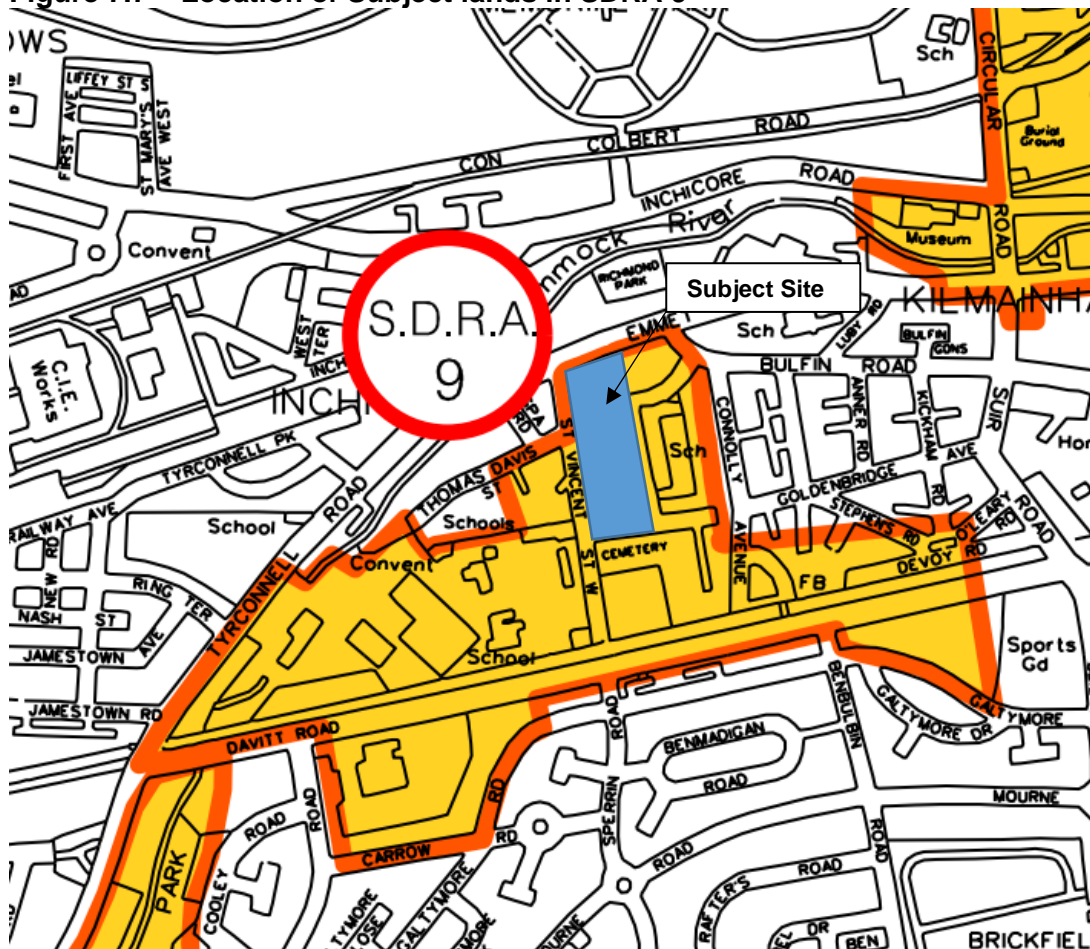
existing local community and new residential community of 578 no. apartments arising from the proposed development.

7.2.3 Capacity of Strategic Development Regeneration Area Lands

The council acknowledges the importance of the SDRAs to accommodate for additional housing. Capacity of SDRAs designated lands for residential use or a mixture of residential and other uses is illustrated below on Figure 4.7 with Emmet Road highlighted in red. The subject lands at Emmet Road are located within SDRAs 9. SDRAs 9 is approximately 15 ha. and can support up to 1,050 housing units.

The location of the proposed development site at Emmet Road within the SDRAs 9 is illustrated below.

Figure 7.7 – Location of Subject lands in SDRAs 9



Source: Map K Draft City Plan

7.2.4 Climate Action

Chapter 3 of the Draft City Plan sets out the policies in relation to Climate Action. It is the Policy of Dublin City Council:

Policy CA1 National Climate Action Policy

To support the implementation of national objectives on climate change including the (~~‘Climate Action Plan 2019 to Tackle Climate Breakdown’~~) ‘Climate Action Plan 2021: Securing Our Future’ (including any subsequent updates to or replacement thereof), the ‘National

Adaptation Framework’ 2018 and the ‘National Energy and Climate Plan for Ireland 2021-2030’ and other relevant policy and legislation.

The proposed development incorporates various features outlined in the ‘Climate Action Plan 2021: Securing Our Future’, the ‘National Adaptation Framework’ 2018 and the ‘National Energy and Climate Plan for Ireland 2021-2030 to minimise the carbon emissions of the construction and operation of the development.

Actions include the reduction of car parking provision, of energy efficient design, the location of the development within an existing urban area and close to public transport infrastructure, (Luas and bus) as set out in the Design Statement prepared by BMCEA and the M&E Report (including Climate and Energy Statement), prepared by IN2, included with this Part X application.

“Policy CA2 Mitigation and Adaptation

*To prioritise **{and implement}** measures to address climate change by both effective mitigation and adaptation responses in accordance with available guidance and best practice.”*

A Site-Specific Flood Risk Assessment of the subject site has been carried out by OCSC which outlines that the site is at a low risk of coastal and fluvial flooding. The proposed development includes various features to minimise this risk of fluvial flooding including SuDs features. These measures increase the resilience of the development by increasing its resistance to the impacts of climate change.

Policy CA3– Climate Resilient Settlement Patterns, Urban Forms and Mobility

To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019

The proposed development will contribute to achieving sustainable settlement patterns by delivering residential units within an urban centre which will encourage sustainable modes of transport for future residents.

{Policy - Improving Mobility Links in Existing Areas

To support retrofitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city, such as reopening closed walking and cycling links or providing new links between existing areas.}

The proposed development will provide for increased permeability in the area and provide for connectivity lines with adjacent developments. New and improved shared surfaces and links are proposed.

“Policy CA6 – Energy Efficiency in the Built Environment

To support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retrofitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Dublin Council housing stock to a B2 Building Energy Rating (BER) in line with the Government’s Housing for All Plan retrofit targets for 2030.

We refer the Board to the enclosed IN2 Energy Analysis Report which sets out the energy efficiency and compliance with regard to the proposed development.

“Policy CA7 – Climate Mitigation Actions in the Built Environment

To ~~(promote)~~ **{require}** low carbon development in the city which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation ~~(-)~~ **{, see Section 15.7.1 when dealing with development proposals.}** New development should generally demonstrate/ provide for:

- A. building layout and design which maximises daylight, natural ventilation, active transport and public transport use;
- B. sustainable building/services/site design to maximise energy efficiency;
- C. sensitive energy efficiency improvements to existing buildings;
- D. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments;
- E. on-site renewable energy infrastructure and renewable energy;
- F. minimising the generation of site and construction waste and maximising reuse or recycling;
- G. the use of construction materials that have low to zero embodied energy and CO2 emissions; and
- H. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.”

A Daylight and Sunlight Assessment has been prepared by IN2 and is submitted with this Part X application. This assessment has studied the effect the proposed development would have on the level of daylight and sunlight received by the neighbouring residential properties that are in close proximity to the proposed development.

“The neighbouring buildings were assessed for both VSC, a measure of potential daylight, and Annual Probable Sunlight Hours, a measure of direct sunlight. The VSC assessment determined that there would be no negative impact as a result of the proposed development. The Annual Probable Sunlight hours and Winter Sunlight Hours assessments determine the annual sunlight impact on a window and the winter sunlight impact through a quantitative assessment. The APSH assessment determined that there would be no negative impact to neighbouring dwellings as a result of the proposed development.”

“Policy CA8 – Climate Adaption Actions in the Built Environment

Development proposals ~~(should)~~ **{must}** demonstrate sustainable, **{climate adaptation, circular}** design principles for new buildings / services / site. The Council will promote and support development which is resilient to climate change. This would include:

- A. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;
- B. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;
- C. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);
- D. reducing flood risk, damage to property from extreme events– residential, public and commercial;
- E. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;
- F. promoting **{, developing}** and protecting biodiversity, **{novel urban ecosystems}** and green infrastructure.

The proposed development includes green roofs, SuDs tree pits, pervious paving outlined in Policy CA8 above, and set out in the OCSC Engineering Services Report included with the application.

“Policy CA9 – Climate Action Energy Statements

All new developments involving 30 residential units and/ or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.”

The proposed development includes 578 no. residential units. A M&E Report (including Climate and Energy Statement) has been prepared by IN2 and is submitted with this Part X application.

“Policy CA23 – Waste Management Plans for Construction and Demolition Projects

“To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements.”

A Resource and Waste Management Plan & Operational Waste Management Plan has been prepared by Byrne Environmental and accompanies this Part X application. The document outlines the principles and measure by which the waste generated during the construction phase of the proposed development will be managed and disposed of in compliance with the provisions of the Waste Management Acts 1996 to 2013 and the Eastern Midlands Region (EMR) Waste Management Plan 2015-2021. It describes the measures by which optimum levels of waste reduction, re-use and recycling shall be achieved.

“Policy CA24 – Electric vehicles

To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation.”

“Objective CAO4 – Regional Strategy for Electric Vehicle (EV) Charging

To support and implement the forthcoming Regional Strategy for Electric Vehicle (EV) charging over the lifetime of the plan in order to facilitate the transition to low carbon vehicles required to achieve 2030 national targets.”

The proposed development includes the provision of 10% of standard spaces which will be equipped with electric vehicle charging points which will facilitate and encourage the use of electric vehicles by residents and visitors of the development. All other car parking spaces will have ducting to facilitate charging infrastructure. 100% of spaces shall be ducted for future provision.

“Policy CA25 – Flood and Water Resource Resilience

*To support **{_encourage and facilitate}** the delivery of soft, green and grey adaptation measures to enhance flood and water resource resilience in the city and support the delivery of grey adaptation measures to enhance flood and water resource resilience where necessary.”*

The proposed development includes both green and grey adaptation measures to enhance flood and water resource resilience in the development, which is set out in the OCSC Consulting Engineers Engineering Services Report (ESR), included with the Part X application.

Policy CA26 – Flood Risk Assessment and Adaption

To address flood risk at strategic level through the process of Strategic Flood Risk Assessment, and through improvements to the city’s flood defences.

Policy CA27 – Natural Flood Risk Mitigation

To encourage the use of natural flood risk mitigation or nature based solutions including integrated wetlands, green infrastructure, and Sustainable Drainage Systems (SuDS) as part of wider adaptation and mitigation responses to achieve flood resilience

The proposed development includes a range of SUDS measures as set out in the Engineering Services Report (ESR), prepared by OCSC. A Site-Specific Flood Risk Assessment of the subject site has been carried out by OCSC and is submitted with this Part X application.

7.2.5 Chapter 4 Shape and Structure of the City

Chapter 4 sets out the overarching framework and strategy to guide the future sustainable development of the city. The objective is to ensure that growth is directed to, and prioritised in, the right locations to enable continued targeted investment in infrastructure and services and the optimal use of public transport.

The vision for the urban form and structure of the city is to achieve a high quality, sustainable urban environment, which is attractive to residents, workers and visitors. The approach includes *“the creation of a consolidated city, whereby infill and brownfield sites are sustainably developed, regenerated and new urban environments are created, and where underutilised sites and buildings are actively repurposed and intensified.”*

Policy SC1 of the Draft City Plan states:

“To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties ~~(and)~~ the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.”

The proposed development at Emmet Road will provide for a sustainable quantum of compact urban growth, at a site identified as a strategic regeneration area (SDRA 9). The site benefits from access to existing sustainable transport (bus to the north and Luas to the south). The proposed development will assist and underpin the regeneration of the SDRA at Emmet Road.

The Policy approach to the Inner Suburbs and Outer City as part of the Metropolitan Area is:

“SC8 Development of the Inner Suburbs

To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport infrastructure.”

The subject lands are located within a public transport corridor (Luas), and proposes an appropriate intensification of this under-utilised site, and is aligned with existing (Luas) public transport and is also located adjacent to the proposed Bus Connects route (on Emmet Road), which is subject to an application to An Bord Pleanála.

Policy SC10 of the Draft City Plan seeks:

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

The proposed development provides a sustainable density (155 units per hectare) and is an increased residential density relative to that of some of the surrounding residential areas, in order to facilitate the appropriate and sustainable use of public transport in the area, and to provide for much needed housing.

The Sustainable Residential Development in Urban Areas (2009) guidelines promotes minimum densities in city areas of 50 units per hectare in a public transport corridor (i.e., within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station). The proposed development has been designed to respond positively to the criteria of the accompanying Urban Design Manual, and this has been set out in the Architectural Design Statement prepared by BMCEA accompanying this Part X application.

Policy SC11 of the Draft City Plan states:

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

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

The proposed development represents a comprehensive regeneration of a brownfield site, in close proximity to existing public transport (Luas and bus) and to future enhanced public transport in the form of Bus Connects (on Emmet Road).

The proposed development will improve the urban form of the area, by providing for much needed housing, along with open space and ancillary community facilities. The proposed development has been designed in a sensitive way, with varying heights which respond to the existing land uses in the area (including protected structures). The site benefits from existing connections to community infrastructure, and as part of the overall proposal for the SDRA, community uses are proposed (creche, community hub/library, open space) which will further enhance residential amenity in the area. Further detail on the local community resources are set out in the Social Infrastructure Assessment prepared by John Spain Associates, included with the Part X application. The proposed architecture and urban design response is of a high quality and has been designed with regard to the provisions of Chapter 15 of the Draft City Plan.

Policy SC12 of the Draft City Plan states:

“To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.”

The proposed development incorporates a mix of housing types and tenures, including social and cost rental housing. A range of apartment sizes is also proposed, which will add to housing variety and choice in the area. The majority of the proposed apartments are one-bedroom and two-bedroom apartments, which will complement the existing housing stock in the area. Further detail is set out in Appendix 1 of this report. The proposed development at Emmet

Road will incorporate public, private, and communal open space, resulting in a high level of residential amenity for future occupants.

“Policy SC13 – Green Infrastructure

To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.”

The proposed development incorporates elements of Green Infrastructure into its design in the form of Green Roofs which are also a component of the SuDS of the development and a significant quantum landscaped areas which include pollinator friendly planting, which is set out in the BSLA material included with the Part X application.

“Policy SC14 – Building Height Strategy

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

Please see Section 6.2.3 which sets out a detailed response to the Urban Development and Building Height Guidelines.

Policy SC16 of the Draft City Plan states:

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

The proposed development is located within an identified Strategic Development and Regeneration Area at Emmet Road (SDRA 9) and is therefore considered suitable for increased building heights. The proposed development has been designed to balance the need to deliver much needed housing at a sustainable density with the protection of existing residential communities in the area. The proposed development seeks to deliver on the wider aims of the SDRA, and provide for the creation of a new, sustainable community at this location in tandem with the provision of additional community infrastructure which will be of benefit to existing residents of the area and to future residents of the proposed development.

Policy SC17 of the Draft City Plan seeks:

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

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

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

As set out in the BMCEA Architectural Design Statement, the proposed development at Emmet Road has followed a design led approach in respect of height which has had regard to sensitive local receptors including existing residential areas and also protected structures such as Richmond Barracks and St. Michael’s Church and Goldenbridge Cemetery.

The proposed development will enhance the key frontages of the site including Emmet Road, where it is proposed to provide an urban plaza, as well as mix of uses which include a community hub/library, creche, and a commercial building (including a supermarket) with residential over as well as high quality residential buildings which include 3 no. open space areas. The proposed development has been designed with regard to existing view corridors, along with the provisions of Appendix 3 of the Draft City Plan and does not impact on same.

The proposed development at Emmet Road responds positively to the existing and emerging character of the area and seeks to integrate the existing prevailing heights with emerging proposals for higher buildings in the area.

With reference to high quality architecture the Draft City Plan outlines the following:

“Policy SC19 – High Quality Architecture

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

Policy SC21 – Architectural Design

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

The proposed development at Emmet Road will contribute positively to the city’s built environment, located at a prominent site within Inchicore. The proposed development promotes healthy placemaking through promoting sustainable modes of transport (site is in close proximity to bus and Luas) over the motor car. Please see BMCEAs Design Statement for detailed overview of the quality of the proposed scheme including overview of materials used and quality of the public realm. The materials to be used in the proposed development have been selected to reflect the character of the area and are to be durable to reduce running costs in the future.

“Policy SC20 – Urban Design

Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013).”

The proposed development at Emmet Road has been designed to comply with the guidelines set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013). Please see Section 6.0 above for detailed assessment of same.

“Policy SC23 – Design Statements

That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15.”

An Architectural Design Statement has been prepared by BMCEA Architects and is submitted with this Part X application.

With regard to density, the Draft City Plan states that *“There will be continued consolidation of the city to optimise the efficient use of urban land. Higher densities will be promoted in the city centre, within KUVs, certain SDRAs and within the catchment of high capacity public transport. The goal is to provide for a compact city with attractive mixed-use neighbourhoods, a variety of housing types and tenure, adequate social and community infrastructure and adaptable housing, where people of all ages will choose to live as a matter of choice.”*

The proposed density of 155 units per hectare is considered appropriate for the SDR, being located in close proximity to public transport options as well as a range of community and social infrastructure which is set out in the Community and Social Audit, prepared by John Spain Associates.

7.2.6 Chapter 5 Quality Housing and Sustainable Neighbourhoods

It is the Policy of Dublin City Council:

“QHSN1 National and Regional Policy To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.”

The proposed development at Emmet Road has been designed with due regard to the relevant national and regional planning policies and guidelines as set out in section 6 above.

*“To have regard to the DEHLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2020), ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009), Housing Options for our Aging Population ~~(2020)~~ (2019, the Design Manual for Quality Housing (2022),} **(and)** the Design Manual for Urban Roads and Streets (DMURS) (2019) {the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Affordable Housing Act 2021 including Part 2 Section 6 with regard to community land trusts and/or other appropriate mechanisms in the provision of dwellings.}”*

The proposed development is designed in accordance with the DEHLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2020), ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets’ (DMURS) (2019).

7.2.6.1 Regeneration, Compact Growth and Densification

The Draft City Plan notes that *“The City Council recognises the need to create sustainable communities and address the underlying causes of deprivation through a combination of social, educational and economic initiatives while rejuvenating the built environment in key regeneration areas. **As set out in the core strategy in Chapter 2, the 17 identified SDRAs will be prioritised for development and intensification over the plan period.**”* (Emphasis added).

The following objectives are outlined:

“QHSN4 Key Regeneration Areas

To promote the transformation of the key regeneration areas into successful socially integrated neighbourhoods and promote area regeneration in parts of the city which require physical improvement and enhancement in terms of quality of life, housing and employment opportunities and to ensure a balanced community is provided in regeneration areas.”

The proposed Part X development at Emmet Road will provide a range of housing tenures within the scheme comprising cost rental and social housing and will result in a substantial physical improvement, and regeneration, to the subject site through the introduction of a high-quality designed scheme which includes a community hub/library, public plaza and retail development along the northern frontage.

“QHSN9 Urban Density

To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.”

The higher densities of the proposed development are appropriate in the context of the Urban Development and Building Height Guidelines 2018 and represents an under-utilised site, identified for regeneration in the Draft City Plan. The high-quality architecture proposed (as set out in the BMCEA Architectural Design Statement) will result in a development which will integrate with the character of the area.

7.2.6.2 Healthy Placemaking and the 15-Minute City

Section 5.5.3 of the Draft City Plan notes that a core objective of the plan is to promote the principle of the 15-minute city, stating that *“the 15-minute city concept envisages that within 15 minutes on foot or bike from where they live, that people should have the ability to access most of their daily needs.”*

The following objectives are noted:

“Policy QHSN10 – 15-Minute City

It is the Policy of Dublin City Council to promote the ~~(concept)~~(realisation) of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, {intergenerational and accessible,} safe and inclusive public spaces served by local services, amenities(, sports facilities) and sustainable modes of {public and accessible} transport {where feasible}.”

The proposed development is fully consistent with and supports the core principles of the 15-minute city concept by providing a mix of uses in a sustainable urban neighbourhood which will provide a place to live, shop and also provides recreational areas (public open space) which is within walking distance of a range of essential and recreational services, public transport, facilities and amenities in Inchicore.

Figure 7.8 – Key Neighbourhoods



“QHSN11 Neighbourhood Development

To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing.

Promote developments which:

- *build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places;*
- *integrate active recreation and physical activity facilities **{including community centres and halls as part of the 15-minute city}**;*
- *encourage sustainable and low carbon transport modes through the promotion of alternative modes and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance;*
- *promote and implement low traffic neighbourhoods to ensure a high-quality built environment and encourage active travel in delivering the 15 minute city model.*
- *promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance;*
- *promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects;*
- *cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion;*

- *provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life;*
- *have regard to the Guiding Principles for ‘Healthy Placemaking’ and ‘Integration of Land Use and Transport’ as set out in the Regional Spatial and Economic Strategy and national policy as set out in ‘Sustainable Residential Development in Urban Areas’ and the ‘Design Manual for Urban Roads and Streets (DMURS)’;*
- *are designed to promote safety and security and avoid anti-social behaviour.”*

The proposed development will create a unique high-quality mixed-use area, located in Inchicore and will create a new urban place which integrates within the site’s existing context. The proposal includes a community hub/library which includes community floorspace. All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme.

The proposed development has been designed to ensure walking and cycling is a safe, attractive, and feasible mode of transport for future residents and users of the development by creating a highly permeable development that also provides permeability within the design. We refer the Board to the enclosed Road Safety Audit included with the application.

Additionally, the proposed landscaping will foster safe and secure outdoor spaces within the proposed development. A lighting plan will ensure that this sense of security will be maintained throughout the evening. Good privacy and defensible urban spaces are also provided through suitable landscaping and balcony finishes.

With reference to safety and security, communal and public open spaces will benefit from passive surveillance from apartments within the scheme; with the intention to avoid anti-social behaviour. BMCEA liaised with and briefed an Garda Síochána with details of the scheme layout at pre-application stage. Detail on the design measures integrated into the scheme are set out in the BMCEA Design Statement.

“Policy QHSN15 – Accessible Built Environment

To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 {and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities}.

As set out in the Architect’s Design Report, all public areas have been designed in accordance with Part M of the Building Regulations. This will enable users with reduced mobility to move easily throughout the scheme. The design includes appropriate accessible parking spaces and dipped kerbs, tactile paving and other landscape features to improve accessibility for a wide variety of users with impaired mobility.

“Policy QHSN16 – Sustainable Neighbourhoods

It is the Policy of Dublin City Council to promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, {e.g.}(i.e.) children, people of working age, older people {, people living with dementia} and people with disabilities.”

The proposed development will provide a range of unit sizes and tenures catering for a broader cohort of the population and supporting the creation of a more sustainable neighbourhood. The wider SDRA includes permission for a 52-unit older persons living accommodation, which will further promote a sustainable neighbourhood catering for a wide range of residents.

“Policy QHSN20 – Gated Residential Development

It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.”

The proposed development improves the connectivity of the wider area by delivering a highly permeable development along the public streets. Internal courtyards will be managed so as to ensure appropriate access is provided to future residents.

Policy QHSN21 – Adaptable and Flexible Housing

*It is the Policy of Dublin City Council: To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of the Environment, Heritage and Local Government’s ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007) **(.)** and the Universal Design Guidelines for Homes in Ireland 2015.*

Policy QHSN22 – Independent Living

To support the concept of independent living and assisted living for older people, to support and promote the provision of specific purpose-built accommodation, including retirement villages, and to promote the opportunity for older people to avail of the option of ‘rightsizing’, that is the process of adjusting their housing to meet their current needs within their community.

Policy QHSN24 – Housing for People with Disabilities

*It is the Policy of Dublin City Council: To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which **(promotes){facilitates}** equality of **(opportunity){outcome}**, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/ supported living units, lifetime housing, and adaptation of existing properties.”*

The proposed development will deliver 578 no. units which have been designed to be easily accessible. These apartments may be suitable for older people wishing to downsize to accommodation that is more reflective of their requirements, while still living independently.

The proposed development has been designed to comply with Part M of the Building Regulation. This facilitates equality of outcome by ensuring units are suitable for a broad range of people, regardless of their level of mobility. The wider SDRA includes permission for a 52-unit older persons living accommodation, which will further promote a sustainable neighbourhood catering for a wide range of residents.

“Objective QHSNO10 – Universal Design

{It is an Objective of Dublin City Council: To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H’s Design Manual for Quality Housing 2022 and the DHP&LG & DH’s Housing Options for Our Ageing Population Policy Statement 2019.} “

All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme. Care has been taken to design entrances which will be well lit and clearly signposted. These entrances also provide sheltered spaces at the threshold ensuring suitability for a range of users.

The proposed development accords with the requirement to have the majority of units at least 10% greater than the minimum sizes (51% of units exceeding the minimum requirement by 10% or more).

With reference to the nature of the cost rental model, we understand from DCC that the additional costs associated with providing full compliance is not feasible, also noting that the design of the Apartments complies with the Apartment Guidelines 2020. It is further noted that permission is in place for a 52-no. unit older persons development within the SDRA (all of which are designed to universal design standards), and that future DCC owned sites/projects in the area could provide cater for additional universal design units.

As required under current Building Regulations, all of the proposed units within the development have been designed to be compliant with Technical Guidance Document M of the Building Regulations 2010, and the Apartment Guidelines 2020. The design includes appropriate accessible parking spaces, dipped kerbs, tactile paving and other landscape features which improve accessibility for a wide variety of users with impaired mobility.

We refer the Board to the BMCEA Architectural Design Statement which provides further detail.

“Policy QHSN33 – Diversity of Housing Type and Tenure

To support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing.”

The proposed development provides a mix which includes 24% social housing units (137 no. units) and 76% cost rental units (441 no. units). It is also noted that the DCC site (1b) adjacent to the proposed development includes 52 no. older persons accommodation (social units) which would result in a 30% social housing mix to 70% cost rental across the 2 no. sites.

The proposed mixed-use development will provide a sustainable community through the inclusion of a mix of uses which will cater for future residents, without the need for the use of a car. The proposal will provide high quality housing and well-designed, safe and inclusive public spaces which is served by local services and amenities located in Inchicore.

Specific Housing Typologies

The following policies are noted:

“QHSN34 High Quality Apartment Development

To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.”

The proposed development provides high quality apartments with excellent amenity located in close proximity to high quality landscaping as well as local support facilities such as the existing Primary Care Centre located adjacent in Richmond Barracks and a range of services in Inchicore (which are set out in the Social Infrastructure Assessment prepared by John Spain Associates, included with the Part X application).

“QHSN35 Houses and Apartments

To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.”

The proposed development has been designed to achieve a high standard of residential amenity for all apartments, and this is set out in the Housing Quality Assessment prepared by BMCEA. In addition, the proposed development includes play activities for a wide range of ages. The proposed development meets and where possible exceeds the standards set out in the Apartment Guidelines 2020, and therefore will provide for a high standard of amenity for all future occupants.

Cost Rental & Specific Housing Typologies

The following policies support the proposed mixed-use development at Emmet Road. As highlighted below the council is pursuing to promote the cost rental model and seeks '*greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing*'. (Emphasis added)

“QHSN32 Social, Affordable Purchase and Cost Rental Housing

To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council’s Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH ‘Social Housing Strategy 2020’ and support the realisation of public housing.

QHSN33 Diversity of Housing Type and Tenure

To support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing”. (Emphasis added)

Additionally, the council notes the need to cater for a mix of tenures:

“Delivering good quality housing to cater for diverse housing needs - mix of tenures and typologies to meet people's full lifecycle and avoidance of large areas of mono use developments”.

With reference to the above, the proposed development includes some 74% cost rental units which are in accordance with the policies above, as well as Housing for All, published by the Government in 2021.

“Policy QHSN35 – Houses and Apartments

To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.”

Each dwelling is provided with an area of usable private open space. This is generally a private balcony space, while some ground floor units have terrace spaces with a planted buffer. The apartments comply with the provisions of the 2020 Apartment Guidelines as set out in the Housing Quality Assessment, prepared by BMCEA.

“Policy QHSN36 – Housing and Apartment Mix

To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.”

The primary purpose of the residential content of the scheme is to meet clear demand for affordable cost rental and social apartments in urban locations.

The development contains the following mix of apartments:

- 110 no. studio apartments (19%)
- 172 no. 1 bedroom apartments (29.8%)
- 250 No. 2 bed apartments (43.2%)
- 46 No. 3 bedroom apartments (8%)

The proposed development provides a mix which includes 24% social housing units (137 no. units) and 76% cost rental units (441 no. units). It is also noted that the DCC site (1b) adjacent to the proposed development includes 52 no. older persons accommodation (social units) which would result in a 30% social housing mix to 70% cost rental across the 2 no. sites.

“Policy QHSN37 – Management

To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.”

We refer the Board to the Operational Management Plan prepared by Hooke MacDonald, enclosed with this Part X application, which sets out details in respect of the operational management aspects of the proposed Part X development.

7.2.6.3 Social and Community Infrastructure

The following policies are noted:

“Policy QHSN45 – High Quality Neighbourhood and Community Facilities

It is the Policy of Dublin City Council to encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. {To also protect existing community uses and retain them where there is potential for the use to continue.}”

The proposed development at Emmet Road will deliver a range of high-quality neighbourhood and community facilities including community hub/library (with flexible community multifunctional spaces), a public plaza, public open space, a creche, and children’s play areas.

“QHSN46 Community and Social Audit

To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards

QHSN011 Community Infrastructure Audit SDRAs

To carry out and maintain an audit of community infrastructure for Strategic Development and Regeneration Areas, where appropriate.”

With reference to the above, a Community and Social Audit has been prepared by John Spain Associates and is included with the Part X application, which details the wide and varied range of existing community facilities in the area. The proposal includes high quality

neighbourhood/community facilities in the form of a significant and substantial community hub/library (c. 2,810 sq. m) as well as a creche (816 sq. m).

“QHSNO12 Community Safety Strategy

That all housing developments over 100 units shall include a community safety strategy for implementation.”

7.2.7 Standards for Residential Accommodation

Section 15.9 of the Draft City Plan sets out the standards for apartment standards in respect of mix and notes that SPPR1 of the Apartment Guidelines 2020 is applicable to the Dublin City administrative area. The Draft City Plan identifies 2 no. areas comprising (i) the Liberties and (ii) the North Inner City, with a different requirement. The site of the proposed development is not located in either of the 2 no. areas, and as such the Apartment Guidelines 2020 on mix apply to the subject site.

It is also noted that the Draft City Plan outlines that Part X residential schemes may propose a different mix:

‘Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department’. ‘Standards may be relaxed for other social housing needs and/or where there is a verified need for a particular form of housing, for example for older people, subject to the adjudication of the Housing & Community Services Department’.

With reference to the above, the proposed mix has been informed by requirements of Dublin City Council Housing Department, in respect of Area J (within which the site is located). Further detail is provided in Appendix 1 of this report (in the Hooke Mac Donald Report).

7.2.8 Chapter 7 The City Centre Urban Villages and Retail

The Draft City Plan recognises the importance of Urban Villages and Neighbourhood Centres and notes the following,

“These urban villages and neighbourhood centres have an important role to play in the creation of sustainable neighbourhoods in both the established urban villages and in developing areas”.

The following policies and objectives are relevant to the proposed development.

“CCUV2 Retail Hierarchy To implement the retail hierarchy contained in the ‘Retail Strategy’ of this Development Plan and to support retail development at all settlement levels in the city. Retail development within the hierarchy of centres will be of a scale, type, and nature that reflects and enhances the role and function of the centre within which it is proposed as per the Retail Strategy, Appendix 2.”

The scale of the quantum of the retail element of the proposed development is in accordance with the Retail Strategy as set out in Appendix 2 of the Draft City Plan. Inchicore is designated as a Level 4 centre in the retail hierarchy for Dublin City. The Retail Strategy notes that Urban Villages:

“Their Functions include local / weekly convenience; small comparison retail; Food and beverage; cultural and leisure functions; specialist / niche /Independent retailing and community and social services. These centres by reason of their variety of offer and level of concentration around the City add to the vibrancy and vitality of the city.”

The proposed development will provide a local/weekly convenience neighbourhood shop at a scale which is in accordance with the Retail Strategy.

“CCUV3 Sequential Approach To promote city centre and urban village vitality through the sequential approach to retail development, enable good quality development in appropriate locations, facilitate modal shift and to deliver quality design outcomes.”

The proposed development is in accordance with the sequential approach is considered to be an “edge of centre” site. Appendix 1 of the Retail Impact Statement, prepared by John Spain Associates, included with the Part X application, provides more detail in respect of other sites reviewed. The site is located adjacent to the Urban Village of Inchicore, within walking distance and easily accessible to the urban centre.

“CCUV6 To ensure that large scale retail / mixed use development proposals match the capacity of existing and planned public transport; provide good quality street environments to provide safer and more attractive settings for people to shop / do business; and incorporate cycle and pedestrian friendly designs in line with the Retail Design Manual 2012.”

While the proposed development does not comprise a large-scale retail development, the proposed development is located beside several high frequency transport routes (bus and Luas) and is ideally situated to support the mixed-use development (further detail on frequency and capacity of public transport is provided in the OCSC Traffic and Transportation Assessment, included with the Part X development). The proposed development will enhance the retail/retail related services provision within the urban village of Inchicore. The design team has designed a high-quality proposal that complies with the Retail Design Manual 2012.

“CCUV20 Mixed Use Key Urban Villages/Urban Villages To support the development, regeneration and or consolidation of Key Urban Villages/urban villages as appropriate, to ensure these centres continue to develop their mixed used role and function adding vitality to these centres including through the provision of residential development.”

“CCUV21 Scale of Retail Development in Key Urban Villages/ Urban Villages To have regard to the guiding principles regarding the scale of retail development to be promoted in each Key Urban Village as set out in the Dublin City Retail Strategy in Appendix 2.”

“CCUV26 To support and facilitate local shopping and retail services commensurate with new residential areas to provide day to day and top up shopping needs.”

With reference to policies CCUV20, CCUV21 & CCUV26, the proposed scale of retail development is in accordance with Appendix 2 of the Draft Retail Strategy. In addition, the proposed development includes a mix of uses, including residential development. The proposed development aims to revitalise an underutilised site to provide a mixed-use development which will enhance the retail offer for existing residents in the catchment and will also provide a day to day top up shopping needs of both existing and future residents within the catchment. The area of Inchicore has an under provision of neighbourhood convenience retail. The retail facilities proposed will support the future and existing residents in the local area.

“CCUV27 To promote convenience retail development in the city, particularly in new regeneration areas and where such development can provide an important anchor to secure the vitality and viability of Key Urban Villages, urban villages and neighbourhood centres.”

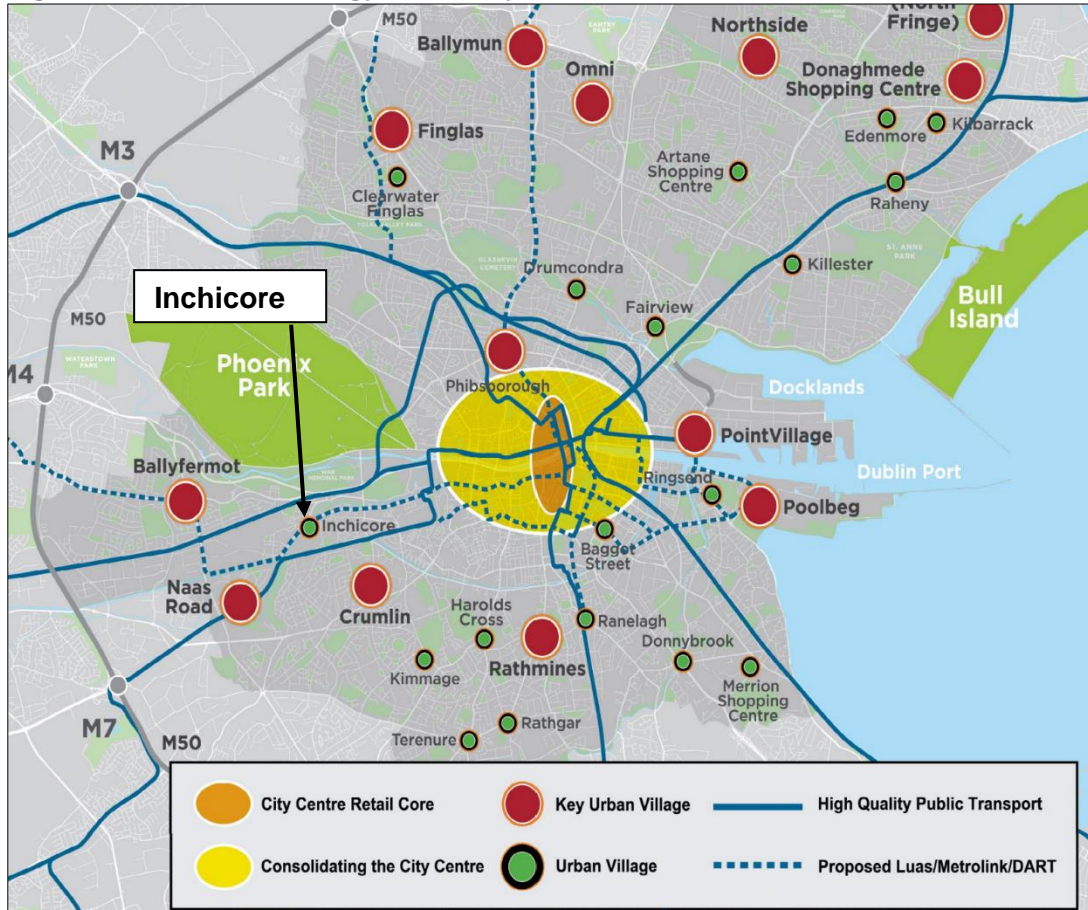
The subject lands are located within SDRA 9. The proposed development provides for a convenience retail anchor that will support future and existing residents. This will secure the vitality and viability of this area. We refer the Board to the Retail Impact Statement prepared

by John Spain Associates, included with the application, which demonstrates that there is sufficient capacity to accommodate the retail development.

“CCUV28 To support and promote the development of retail service development at all levels of the retail hierarchy in the city.”

The proposed development provides for a mixed-use development which contains a retail component. This development is in a location that sits on level 4 of the retail hierarchy.

Figure 7.9 – Retail Strategy Draft City Plan 2022-2028



Source: Figure 7.1 Draft City Plan

7.2.8.1 Appendix 2 Retail Strategy

The Retail Strategy for the Draft City Plan acknowledges the importance of Inchicore as an Urban Village and recognises the need for convenience retail at these locations:

‘It is the policy of the Council to continue to promote the development of appropriately scaled convenience retail development in the city, particularly in new regeneration areas, and where such development can provide an important anchor to secure the vitality and viability of urban villages and neighbourhood centres. See section 10.0 below for further detail’.

The proposed development includes a local neighbourhood shop (supermarket) which will provide existing residents and future residents of the scheme, access to much needed convenience floorspace. A Retail Impact Statement, prepared by John Spain Associates, has been prepared and is included with the Part X application.

7.2.8.2 Scale and Location of Retail Development

The Strategy provides guidance on the location and scale of retail development. Regarding Urban Villages the Draft City Plan recognises the need to consolidate and enhance these areas to meet the need of the local population. The role of urban villages is primarily to support convenience retail.

'The consolidation and enhancement of urban villages is an objective of this plan to ensure that these centres continue to develop their mixed-use inner city, inner / outer suburban role, and function with a level of retail appropriate to their location. It is an objective of this plan that large scale comparison retail proposals be directed to the City Centre Retail Core.'

The proposed development provides a mix of uses and a scale of retail development commensurate with the role and function of Inchicore as an Urban Village (level 4) centre on the Retail Hierarchy.

Sequential Approach

Regarding edge of centre sites, the plan outlines the following,

"Where retail development on an edge of centre site is being proposed, only where it can be demonstrated and the planning authority is satisfied that there are no sites or potential sites including vacant units within the city centre or a KUV/ UV or neighbourhood centre that are (a) suitable (b) available and (c) viable, can an edge of centre site be considered. An edge of centre site is normally within walking distance of and easily accessible to an urban centre."

The subject lands are situated on SDRA lands immediately adjacent (and within easy walking distance) to the Urban Village of Inchicore (Z4 zoned lands). The proposal primarily provides a "Shop Neighbourhood" scale of development. A sequential test has been undertaken and is included within Appendix 1 of this Retail Impact Statement, which confirms that there are no available viable sites within the Z4 lands.

Guidance on Specific Forms of Retail

The guidance notes the maximum size of convenience retail floorspace in Dublin City is 4,000 sq. m. net retail floorspace. Regarding edge of centre development locations, the plan notes the following,

"Edge of centre locations for such developments may be appropriate subject to the provisions of the sequential approach as outlined above. It is acknowledged that many urban centres due to their historic layout, land use patterns and site ownership have a lack of sites suitable to accommodate the larger format convenience operators. This is also acknowledged in the Retail Planning Guidelines, 2012."

The proposed development is proposing a convenience retail anchor of 2,476 sq. m within an edge of centre location on SDRA lands.

Having regard to the above, it is considered that the proposed development is fully in accordance with the retail policies and objectives pertaining to the site as set out within the Draft Dublin City Development Plan 2022-2028.

Conclusions

This retail planning policy review has confirmed that the proposed development is consistent with the strategic aims and objectives set for the proper planning and sustainable development of the SDRA 9 lands. The proposed development which includes 1,765 sq. m of net retail floorspace along with 564 sq. m of retail/retail services related floorspace (in 5 no. units) and 285 sq. m of restaurant and café/restaurant floorspace (2 no. units) within the SDRA 9 lands

is fully in accordance with and supported by the policies and objectives of the Retail Planning Guidelines, the Retail Strategy for the Greater Dublin Area, the Dublin City Development Plan. The proposed development is therefore considered to be in accordance with the proper planning and sustainable development of the area.

7.2.8.3 Providing for Mixed Use Developments

The plan supports a mix of uses which will ensure vibrancy within the Inchicore area.

“Mixed use developments provided by redevelopment or through the repurposing of existing floor space which provide activity at street level in the city will be supported. A mix of retail, office, cultural and entertainment uses can generate footfall in the city and support city centre uses. The provision of a range of retail floorplates, including smaller units can provide opportunities to integrate independent retailer into streets.”

The subject lands are situated on SDRA lands immediately adjacent to the urban village of Inchicore. The proposal primarily provides for convenience retail, recognising that the city centre is the preferred location for high end fashion retailers. The plan notes that urban villages/ Neighbourhood Centres can provide retail that is of ‘a form and a scale appropriate to the needs of the catchment that these centres are serving’.

Having regard to the above, it is considered that the proposed development is fully in accordance with the retail policies and objectives pertaining to the site as set out within the Draft Dublin City Development Plan 2022-2028.

7.2.9 Chapter 8 Sustainable Movement and Transport

Dublin City Council acknowledges the importance of transitioning to low carbon mobility solutions to mitigate against climate change and will continue to address this through an integrated set of policies and objectives.

According to the Draft City Plan, parking policies seek to limit car parking at destination while the need to travel generally is minimised by designing mixed used layouts where people can live close to where they work and have access to a range of community facilities and services in short walking and cycling times or accessed by high quality public transport links i.e. the 15-minute city.

The Draft City Plan outlines that Dublin City Council also supports the development of mobility hubs, the aim of which is to encourage varied and sustainable types of transport in areas that are close to existing public transport links with high concentrations of employment, housing, shopping, amenities and recreation. A mobility hub is a place of connectivity where different travel options such as walking, cycling, public transport and shared mobility services, are located together to facilitate ease of access and transition between transport modes. Together with quality public realm and place making, mobility hubs can help create vibrant and liveable places to support the transportation experience.

7.2.9.1 Car Parking

The Draft City Plan outlines the following:

“Policy SMT1 – Modal Shift and Compact Growth

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

The proposed development will encourage the use of more sustainable forms of transport by creating a highly permeable development that prioritises the provision of active transport infrastructure and the safety of pedestrians and cyclists.

“SMT5 Mobility Hubs

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

The proposed development includes a village car park located at under-croft level of the commercial building at Emmet Road. It will include shared car spaces along with cycle parking.

“SMT7 Travel Plans for New and Existing Developments

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

The proposed development includes a Mobility Management Plan, prepared by OCSC Consulting Engineers, which is included with the Part X application.

“Policy SMT10 – Pedestrian network

To protect, improve and expand on the pedestrian network (~~inclusive of facilities for people with mobility impairment and/or disabilities, including the elderly and people with children,~~) linking key public buildings, shopping streets, public transport points and tourist and recreational attractions {whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.}”

All public areas have been designed with DMURS and Part M of the Building Regulations in mind enabling users with reduced mobility to move easily throughout the scheme

“SMT12 Urban Villages and the 15-Minute City

To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and public realm enhancement.”

The proposed development includes significant enhancements to the public realm which will provide an attractive frontage to Emmet Road. The proposed development is within easy walking distance to the centre of Inchicore located c. 300-400m to the west.

“Objective SMT02 – Improving the Pedestrian Network

To improve the pedestrian network {, and prioritise measures such as the removal of slip lanes, the} introduction of tactile paving, ramps {, raised tables} and kerb dishing at appropriate locations, including pedestrian crossings, {street junctions,} taxi ranks, bus stops and rail platforms in order to optimise {safe} accessibility for all users.”

The design of the development at Emmet Road includes dipped kerbs, tactile paving, and other landscape features to improve accessibility for a wide variety of users with impaired mobility continuing priority pedestrian access across the site.

“Policy SMT15 – Walking, Cycling and Active Travel

To prioritise the development of {safe and connected} walking and cycling facilities and {prioritise} (encourage) a shift to active travel for people of all ages and abilities, in line with the city’s mode share targets.”

The proposed development at Emmet Road has been designed to promote the use of active transport where possible by designing a permeable development that prioritises the safety and convenience of pedestrians and cyclists. The level of cycle parking provided within the

development (1,285 no. spaces) and the car parking provided (106 no. spaces overall) is to encourage active travel by residents of the scheme.

“Policy SMT17 – The Pedestrian Environment

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

The proposed development will improve connectivity for pedestrians by allowing the public to pass through the development through the inclusion of east west streets. The site is surrounded to the east and west by existing streets, which provide north south permeability in the area.

“Objective SMT010 – Cycle Parking Spaces

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

Objective SMT011 - Design Standards for Cycle Parking in Developments

To prepare, {in the lifetime of the plan} {within two years of the adoption of the Plan,} a comprehensive guide setting out design standards and requirements for cycle parking in developments.

Objective SMT012 – Cycle Parking Facilities

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

With reference to the above, the proposed development provides 1,285 no. cycle spaces dispersed throughout the development.

“Policy SMT27 – Expansion of the EV Charging Network

To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.”

The proposed development will deliver 10% of standard car parking spaces electric vehicle charging points and all spaces will be ducted for future use.

“Policy SMT30 – Design Manual for Urban Roads and Streets

To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.”

The proposed development has been designed in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS).

Compliance is detailed in the OCSC DMURS Compliance report, included with the Part X application.

The following is noted:

“SMT 25 Car Parking in Residential and Mixed Use Developments

- (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.*
- (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.*
- (iii) To safeguard the residential parking component in mixed-use developments.”*

With regard to the above, the proposed Part X development provides a sustainable level of car parking for the subject site, commensurate with the site’s location close to Luas stops (to the south) and bus routes along Emmet Road to the north. The development is considered appropriate for reduced car parking provision in accordance with the Draft City Plan, and also the Apartment Guidelines 2020. The proposal also includes 106 no. car parking spaces comprising 50 no. car parking spaces for the residential and the remainder allocated to the other uses including accessible spaces car share spaces and 10% electric vehicle charging points. The car parking spaces will be provided located beneath the supermarket at undercroft level and also be located adjacent to Goldenbridge Cemetery.

7.2.10 Chapter 9 - Sustainable Environmental Infrastructure and Flood Risk

According to the Draft City Plan, the improvement of sustainability in terms of energy, water, waste management and resource efficiency are key future growth enablers for Dublin’s development.

The following policies are noted:

“Policy SI1 – Support for Irish Water

To support and facilitate Irish Water in the provision of high quality drinking water, water conservation and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the city and the Region.”

Irish Water has confirmed the feasibility of connecting the proposed development to the public water supply (subject to an upgrade along Emmet Road which is included in the project design).

“SI2 Integrating Water Services with Development

To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.”

Irish Water have confirmed the feasibility of the proposed development in relation to water and wastewater supply and treatment.

“SI3 Separation of Foul and Surface Water Drainage Systems

To require all new development to provide separate foul and surface water drainage systems.”

As set out in the OCSC Engineering Services Report, the proposed development at Emmet Road separates foul and surface water drainage.

“SI4 Drainage Infrastructure Design Standards

To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).”

We refer the Board to the Engineering Services Report prepared by OCSC Consulting Engineers, which confirms capacity from Irish Water and provides detail on the separation of foul and surface water, as well as compliance with the Greater Dublin Regional Code of Practice for Drainage Works.

7.2.11 Urban Watercourses and Water Quality

The City Plan notes that the Water Framework Directive (WFD) is environmental legislation which aims to protect and improve water quality in support of ecology and the attainment of good status in our rivers, lakes, groundwater, and transitional coastal waters by 2027.

It is the Policy of Dublin City Council:

“SI12 River Restoration in Strategic Development and Regeneration Areas

To provide opportunities for enhanced river corridors in the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible:

• SDRA 1 Clongriffin /Belmayne and Environs • SDRA 3 Finglas Village Environs and Jamestown Lands • SDRA 4 Park West/Cherry Orchard • SDRA 5 Naas Road • SDRA 6 Docklands • SDRA 7 Heuston and Environs • SDRA 9 Emmet Road • SDRA 10 North East Inner City • SDRA 16 Oscar Traynor Road.

SI07 River Restoration Flagship Projects

To support the delivery of flagship river restoration projects where restoration measures can be comprehensively implemented, including the Camac River Corridor. This will include opportunities arising from the regeneration / development of strategic land banks.”

While the subject site is not located directly adjacent to the River Camac, the SUDs measures included in the Part X application will improve the water quality discharging to the river Camac compared to the current situation.

“SI13 Minimising Flood Risk

*To minimise the flood risk in Dublin City from all other sources of flooding as far as is practicable, including fluvial, **{coastal,}** reservoirs and dams, **(and)** the piped water system **{and potential climate change impacts}**.*

SI15 Site-Specific Flood Risk Assessment

All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:

A Site-Specific Flood Risk Assessment has been prepared by OCSC Consulting Engineers which concludes that:

“Based on the above, and the detailed information contained within this SSFRA, there is no apparent flood risk to the proposed development, nor as a result of the proposed development.”

Policy SI21 – Managing Surface Water Flood Risk

To minimise flood risk arising from pluvial (surface water) flooding in the city by promoting the use of natural or nature-based flood risk management measures as a priority and by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard

surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits {and climate adaption}.

SI22 Sustainable Drainage Systems

To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works. Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.

SI23 Green Blue Roofs

To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green and Blue Roof Guide (2021) which is summarised in Appendix 11."

With reference to the above policies, we refer the Board to the Engineering Services Report prepared by OCSC Consulting Engineers, which provides detail on the SUDs drainage proposed within the subject site which will improve water quality, compared to the current situation, where there are no SUDs measures in place to improve water quality. The proposed SUDs measures include green roofs, bio-retention systems, SUDs tree pits, filter drains.

"SI25 Surface Water Management

To require the preparation of a Surface Water Management Plan as part of all new developments in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance."

With reference to the above, a Surface Water Management Plan is contained in the Engineering Services Report.

"Policy SI27 – Sustainable Waste Management

To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. {To support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).}"

Policy SI28 – Sustainable Waste Management

To prevent and minimise waste generation and disposal, and to prioritise prevention, recycling, preparation for reuse and recovery in order to {develop Dublin as a circular city and} safeguard against environmental pollution.

Policy SI29 – Segregated Storage and Collection of Waste Streams

To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables, and food waste as appropriate (for further guidance see Appendix 7).

Policy SI30 – Waste Management in Apartment Schemes

To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing:

Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan)."

As set out in the Waste Resource Management Plan and the Operational Phase Waste Management Plan prepared by Byrne Environmental, included with the Part X application, the proposed development at Emmet Road will be designed and operated with the aim of a reduction in waste generation through construction and operational phases. Where possible waste streams will be separated on site and recycled or re used. Where possible local materials will be specified, and in addition materials that contain recycled content will be considered as preferable.

The Operational Management Plan details the waste management plan for the 578 no. apartment units that will be developed in the proposed development which complies with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020.

7.2.12 Chapter 10 - Green Infrastructure and Recreation

The following policies are noted:

"Policy GI3 – Multi-functionality

To ensure delivery of multifunctional green and civic spaces that meet community needs, support biodiversity, promote active and passive recreation, flood and surface water management and local habitat improvements. The multifunctionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks."

The proposed development at Emmet Road includes public open spaces that will be of benefit to the wider community. The proposed development includes the use of SuDS which will be used to manage surface water while also enhancing biodiversity. The design of the open spaces is such that they will cater for a range of ages.

"GI9 European Union Natura 2000 Sites

To conserve, manage, protect and restore the favourable conservation condition of all qualifying interest/special conservation interests of all European sites designated, or proposed to be designated, under the EU Birds and Habitats Directives, as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) (European / Natura 2000 sites)."

With reference to the above, an AA Screening has been prepared by Enviroguide which concludes that:

"On the basis of this screening exercise, it can be concluded, based on the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required."

"Policy GI28 – New Residential Development

To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes."

The proposed development includes extensive public and communal open space located in various locations across the development that will provide a range of recreational areas for future residents of the development and the public. The proposed development includes a

playground and play areas. The design of the proposed development includes various features that make walking and cycling safe. Further detail is provided in the BSLA Landscape Report, included with the Part X application.

“GI51 Children’s Playing Facilities - General

To seek the provision of children’s playing facilities that encompasses local and public places and spaces for play that are accessible and inclusive for children and young people of all ages, abilities and socio-economic backgrounds.

“GI52 Children’s Playing Facilities in New Residential Developments

To seek the provision of children’s playing facilities in new residential developments and mixed developments with a residential element. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising.”

In relation to GI51 and GI52, high quality landscaping proposals are proposed for each of the communal open space areas with a mixture of soft and hard surfaces, to provide opportunities for play and relaxation. All spaces are well overlooked and have good orientation. We refer the Board to the BSLA Landscape Masterplan and Design report, included with the Part X application, which details the provision of child play areas for all ages, which are integrated into the landscape design.

7.2.13 Built Heritage and Archaeology

The Draft City Plan notes that all works to protected structures shall be carried out to the highest standards in accordance with the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts, Heritage and the Gaeltacht, 2011).

“It is the Policy of Dublin City Council: BHA2 Development of Protected Structures That development will conserve and enhance Protected Structures and their curtilage and will:

(a) Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the ‘Architectural Heritage Protection Guidelines for Planning Authorities’ 2011 published by the Department of Culture, Heritage and the Gaeltacht.

(b) Protect Structures included on the RPS from any works that would negatively impact their special character and appearance.

(c): Ensure that works are carried out ~~(under the supervision of)~~ {in line with best conservation practice as advised by} a suitably qualified person with expertise in architectural conservation.

(d) Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.

(e) Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the Protected Structure.

(f) Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.

(g) Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the Protected Structure.

(h) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.

(i) Ensure historic landscapes, gardens and trees (in good condition) associated with Protected Structures are protected from inappropriate development.

(j) Have regard to ecological considerations for example, protection of species such as bats.”

BHA12 Industrial, Military and Maritime, Canal-side and Rural Heritage To promote the awareness of Dublin's industrial, military and maritime, canal-side (including lock-keepers' dwellings), rail and rural (vernacular) heritage.

BHA019 Built Heritage and Archaeology To provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage and support the in-situ presentation and interpretation of archaeological finds within new developments.

We refer the Board to Chapter 14 of the EIAR, Cultural Heritage – Architectural Heritage, prepared by Blackwood Associates which outlines the following:

“The main residual effect on the architectural heritage is the change of use of the large open site, much of which is occupied by the large green open space that once contained the former Richmond Barracks parade ground, the Keogh Square and later St. Michael's Estate housing scheme. The views southwards towards Goldenbridge Cemetery along St. Vincent's Street West and Patriots Path will be permanently obscured by the new development. The remaining section of the Boundary Wall will be permanently altered. Loss of fabric has to be balanced with overall amenity of the wall presentation – ability of the existing masonry, when modified, to contribute at ground and at roof level to overall positive visual and social amenity of the scheme. Removal of connections to defensive barracks wall allows for more generous connections and visual spatial improvements at junctions. Existing historic buildings will remain a backdrop to new building to the west. Large green space to west of historic buildings will provide breathing space across Patriot's Path.”

The rationale for the removal of some discrete elements of the wall is to provide permeability as well as improving passive surveillance in the area, so as to reduce the potential for anti-social behaviour. The interventions have been carefully considered by the design team in conjunction with consultations with the Conservation Department of Dublin City Council.

7.2.14 Chapter 12 Culture

Chapter 12 of the Draft City Plan outlines that *“the south central area of the city, with its wealth of historical, industrial, crafts and military heritage, has grown in importance as a cultural cluster within the city. A number of recent projects have and are being delivered in the area, making important interventions to support the growth of this area as an emerging cultural hub. Measures include the renovation and opening of Richmond Barracks as a heritage centre within the community with a particular focus on 1916 and the Decade of Centenaries.”*

The following is noted:

“CUO13 Dublin 8 Regeneration

To ensure that the wider regeneration of Dublin 8 contributes to the cultural assets of the community with new spaces provided at street level in larger regeneration projects that will accommodate and provide for new local cultural uses.”

CUO22 SDRAs and large Scale Developments

All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide for 5% community, arts and culture and artist workspaces internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between

cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.

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

CUO26 Co-Design and Audits Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (COU38 refers), be required to undertake a cultural audit for the local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps.”

With reference to the above the proposed Part X development includes a community hub/library of c. 2,810 sq. m as well as a creche of 816 sq. m giving an overall community/cultural floorspace of some 3,626 sq. m. The overall GIA of the development is some 56,838 sq. m which results in a 6.3% provision of community/cultural floorspace provided as part of the proposed development.

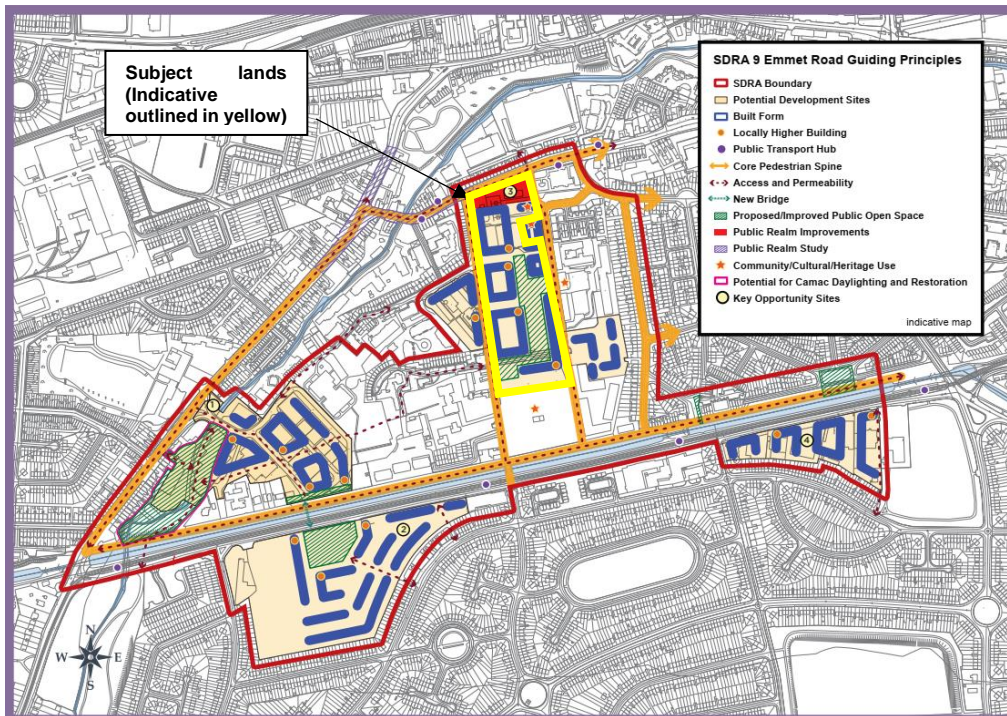
It is further noted the SDRA already contains Inchicore Community Sports Centre, Richmond Barracks (adjacent to the site) which is home to a library, workshops, and cultural activities, along with a programme of historical tours and talks. Overall, there will be a significant community and cultural “cluster” of community uses within the SDRA.

A Community and Social Audit, prepared by John Spain Associates, is also included with the Part X application, which includes a section on local Cultural Infrastructure.

7.2.15 Chapter 13 - Strategic Development Regeneration Areas (SDRAs)

The SDRA builds on the Kilmainham-Inchicore Development Strategy and identifies a number of sites that offer strategic regeneration opportunities for the area. The SDRA seeks to provide a strategic vision for the redevelopment of these regeneration sites and to improve their connections to the villages of Inchicore and Kilmainham. The guiding principles for the development of this SDRA as set out below. The SDRA 9 comprises of 4 no. regeneration areas as illustrated below. This Figure also provides an indicative site layout for the regeneration lands at Emmet Road.

Figure 7.10 – SDRA Emmet Road Draft City Plan 2022-2028



(Map noted as Indicative)

The guiding principles relevant for the proposed development are set out below:

Urban Structure

- ***To seek to provide interventions that contribute a finer grain to the urban structure of the wider area, especially on former industrial and institutional lands.***
- ***To recognise and enhance the role that cultural and historic buildings play in the identity and legibility of the wider area***

In response to the above, the proposed Part X development will provide a fine urban grain through the introduction of a high-quality mixed-use scheme which includes residential, retail, and community uses. The proposed layout includes a series of courtyard blocks which will allow for the inclusion of additional east west streets, which will be overlooked by own door housing. The distribution of the mix of uses across the site is designed to animate the public spaces and reinforce the character and pattern of the urban grain.

The existing historic buildings and protected structures in the area which include the existing Richmond Barracks, St. Michael's Church and Goldenbridge Cemetery have been taken into account in the design of the development, through the inclusion of open space areas which provide appropriate set back of scale and massing in the proposed development. The proposed works to the protected wall will provide legibility to the proposed development, allowing for greater permeability and passive surveillance in the northern part of the proposed development.

Land Use & Activity

- ***To encourage the transition from industrial or former industrial use to mixed-use/residential use in the four 'potential development sites' identified in the Guiding Principles Map whilst acknowledging the role many of the uses play in the local economy and community.***

- ***To deliver a new civic and community hub as part of the redevelopment of the Emmet Road Regeneration Site.***
- ***To capitalise on the presence of Richmond Barracks and Goldenbridge Cemetery within the Inchicore area and to facilitate the creation of linkages to other nearby historic and cultural uses.***

The proposed mixed-use development is identified as one of the 4 no. 'potential development sites' included on the Guiding Principles map. The proposed development will regenerate the subject site and will provide a mix of uses including 578 no. apartments, a supermarket, as well as 5 no. retail/retail related units, 2 no. café/restaurants, a creche and public open spaces.

The proposed development includes a community hub/library located at the northern part of the site of c. 2,810 sq. m which offers an opportunity to co-locate community facilities, a public community hub/library, with mutual benefits arising from the synergies between the 2 no. elements.

The layout of the proposed development includes east west permeability in the layout and also north south permeability in the northern part of the site as well as maintaining the north south permeability along the eastern and western streets, (Patriot's Path and St. Vincent's Steet West) all of which will allow for enhanced linkages within the environs.

Height

- ***To support heights of 6-8 storeys for new developments in the SDRA area where conservation and design considerations permit. Opportunities for locally higher buildings above this height are identified in the accompanying Guiding Principles Map.***

In response to the above, the heights proposed range between 3 and 7 storeys and the scale and massing of the proposed buildings have taken into account the existing protected structures such as St. Michael's Church, Richmond Barracks, and Goldenbridge Cemetery.

Design

- ***To ensure that new buildings respond to the scale and grain of the prevailing character of the particular street.***
- ***To create a civic plaza at the Emmet Road end of the redeveloped Emmet Road Regeneration Site.***
- ***New apartment buildings to generally have own-door access for all dwellings at ground floor level to contribute to increased vitality and activation of the area.***

The proposed scale and massing of the development responds to its context. The design of the development has had regard to the existing context of the site, including built heritage (Richmond Barracks) where the layout provides an area of open space to the front of the entrance to Richmond Barracks. In addition, the proposed plaza at Emmet Road provides a generous space fronting onto St. Michael's Church.

With reference to own door access, the internal east west streets provide own door access. Residential entrances have been organised in order to maximise the level of active facade frontage onto streets and cross streets. Apartment buildings core access is generally provided from Patriots Path and St. Vincent Street West, while own door access is provided along all of the east-west cross streets. Access into the courtyards is via the entrance lobbies.

Green Infrastructure

- ***To ensure that the public open space provision of development sites be sited at locations that are visible, accessible and inviting to the wider public.***

It is proposed to provide three new public spaces, Emmet Place, Richmond Place, and Goldenbridge Place, and a “Play zone” area which activates the north-south connection between Emmet Place and Richmond Place. The 3-no. public open space provided will be accessible and inviting to the wider public as they will be overlooked by apartments providing passive surveillance. Located along the northern extent of the site, fronting Emmet Road it is proposed to provide a substantial area of open space comprising some 3,166 sq. m in extent. The southern part of the site includes a public open space area (Goldenbridge Place c. 1,038 sq. m), which is surrounded by active frontages which include a café c. 80 sq. m (at ground floor level fronting onto the space).

The central part of the site includes a public open space area (Richmond Barracks open space c. 1,404 sq. m), which is surrounded by active frontages which include a creche and the entrance areas to the communal open space to the west.

Movement

- **To facilitate the delivery of the permeability interventions identified in the Guiding Principles Map, which seek to improve accessibility throughout the area.**
- **To improve connectivity north-south across the Grand Canal/Davitt Road and east-west between Goldenbridge Industrial Estate and the Emmet Road Regeneration Site.**
- **To maximise the potential benefit of the BusConnects project to the SDRÁ area in terms of public realm improvements, green infrastructure and pedestrian and cycling infrastructure.**

In response to the above, the proposed development provides east west permeability within the development which will integrate to the existing Patriot’s Path and St. Vincent’s Street West which provide north south permeability in the area. North south permeability is maintained along St. Vincent’s Street West and Patriot’s Path. Some additional north south permeability is provided within the site between the proposed community hub/library and the Commercial Block C, which is overlooked by active frontages.

It is noted that the Bus Connects application to An Bord Pleanála was lodged in July 2022. The design of the development is such that it will integrate with the Bus Connects proposals (as set out on drawing no. B977 OCSC XXXXDRC0116).

7.2.15.1 Guiding Principles for Key Opportunity Sites 3 – Emmet Road Regeneration Site

The Draft City Plan outlines the following in relation to the Key Opportunity site of Emmet Road

“This site is located at the heart of the SDRÁ area. It is proposed to be redeveloped as a mixed use scheme which, as well as being Dublin City Council’s first cost rental residential development, will accommodate a mix of community uses, including a new community centre and library.”

The proposed development includes cost rental and social housing within the overall scheme as well as a mix of community uses comprising a community hub/library located at the northern part of the site fronting onto the plaza and a creche, located centrally within the scheme adjacent to Block B.

“Commercial units, including a supermarket should be located at the northern end of the site, fronting onto a civic plaza along Emmet Road. The site’s redevelopment will serve to tie together the wider SDRÁ area.”

The proposed development includes a supermarket located at the northern part of the site fronting onto the proposed civic plaza at Emmet Road. In addition, the proposed development includes 5 no. retail/retail service-related units and 2 no. café/restaurant units.

“In relation to heights, the Emmet Road site is considered capable of delivering a new baseline height of 8 storeys with locally higher buildings in specified locations as detailed in the Guiding Principles Map, Figure 13.9, subject to detailed design and to compliance with Appendix 3 of the development plan.”

The proposed development includes a range of heights consisting of 3, 5 and 7 storeys, which responds to its immediate context, in terms of Richmond Barracks, St. Michael’s Church and Goldenbridge cemetery. Compliance with Appendix 3 of the Draft City Plan is set out in section 7.2.17 of this report.

“In relation to unit mix and typologies and having regard to the cost rental nature of the scheme and the particular profile of housing provision in the area, the standards set out in Section 15.9.1 of the Plan are not necessarily applicable to the Emmet Road project.”

The development contains the following mix of apartments:

- 110 no. studio apartments (19%)
- 172 no. 1 bedroom apartments (29.8%)
- 250 No. 2 bed apartments (43.2%)
- 46 No. 3 bedroom apartments (8%)

The proposed development provides a mix which includes 24% social housing units (137 no. units) and 76% cost rental units (441 no. units). It is also noted that the DCC site (1b) adjacent to the proposed development includes 52 no. older persons accommodation (social units) which would result in a 30% social housing mix to 70% cost rental across the 2 no. sites.

7.2.16 Chapter 15 Development Management Standards

Section 15.2.3 of the Draft Plan notes that planning applications should be supported by the necessary analysis and documentation to demonstrate the proposed design and rationale for a scheme. To assist in the planning application preparation, Table 15-1 of the Draft City Plan sets out the development thresholds for some of the documentation related to specific planning applications.

In this regard the design team reviewed Table 15.1 and proposed suite of documents included with the Part X application responds to Table 15.1 of the Draft City Plan.

7.2.16.1 Key Design Principles

Section 15.4 of the Draft City Plan notes that *“High quality design supports the creation of good places and has a positive impact on health and well-being.”*

On housing developments over 100 units, the Council will require the submission of a community Safety Strategy (see policy QHSNO12) which would set out the design features incorporated to address the above measures to ensure a high level of safety and security is maintained including, overlooking, passive surveillance, street lighting and clear accessible routes.

We refer the Board to the BMCEA Design Statement which includes detail on how the design has been considered to increase passive surveillance throughout the scheme. It is noted

consultations were undertaken with An Garda Síochána in relation to the safety aspects of the design.

7.2.16.2 Building Height

Appendix 3 identifies the height strategy for the city and the criteria in which all higher buildings should be assessed. All proposals for greater height than the prevailing context and intensification in SDRA's must demonstrate compliance with the performance-based criteria set out in Table 3 of Appendix 3.

In relation to building height, Section 3.1 of Appendix 3 sets out three general categories of height in the Dublin context, as follows:

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

The subject development proposes block heights in a range of 3-7 storeys. The proposed height is in compliance with the heights indicated within the designated SDRA area. It is considered that the proposed buildings heights are appropriate in the context of the Draft City Plan.

The Criteria for Assessment is outlined as follows:

- *Masterplan* - There will be a requirement that for any significant scheme (on sites greater than 0.5ha) seeking to increase densities and height that a masterplan is prepared
- Performance based criteria - Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale

7.2.16.3 Appendix 3 Achieving Sustainable Compact Growth Policy for Density and Building Height in the City

Strategic Development Regeneration Areas (SDRA)

With reference to SDRAs, Appendix 3 of the Draft City Plan outlines that SDRAs “are to be the focus of compact growth over the plan period with the objective to facilitate ongoing intensification, infill and compaction.”

Appendix 3 specifies that all proposals for greater height than the prevailing context and intensification in SDRA's must demonstrate compliance with the performance based criteria set out in Table 3 which is addressed below:

1. To promote development with a sense of place and character

The design of the proposed development provides a high-quality development with a strong sense of place and character which will integrate with the existing urban village of Inchicore. We refer the Board to the Architectural Design Statement, prepared by BMCEA which sets out the design rationale for the subject lands.

The design of the development has had regard to the existing context of the site, including built heritage (Richmond Barracks) where the layout provides an area of open space to the front of the entrance to Richmond Barracks.

The site is located within SDRA9 Emmet Road which is identified for a higher density of development in the Draft City Plan and the location of the site has access to existing high frequency/high-capacity public transport options (Bus and Luas).

The proposed development's design includes a series of public open spaces and communal open spaces, which will have a positive impact on the local community and contribute to healthy placemaking on the subject site.

The design of the development avoids long interrupted slab blocks through the inclusion of blocks of varying heights and scale within the courtyard buildings.

2. To provide appropriate legibility

The priority for the design team is to propose a pedestrian friendly series of streets and spaces whereby the proposed site layout plan provides for a legible, permeable and distinctive layout. The proposed layout of the development provides for a straightforward, easily accessible and easily navigable network of places for pedestrians and cyclists which integrates with the existing street layout at Emmet Road as well as along Patriot's Path and St. Vincent's Street West.

3. To provide appropriate continuity and enclosure of streets and spaces

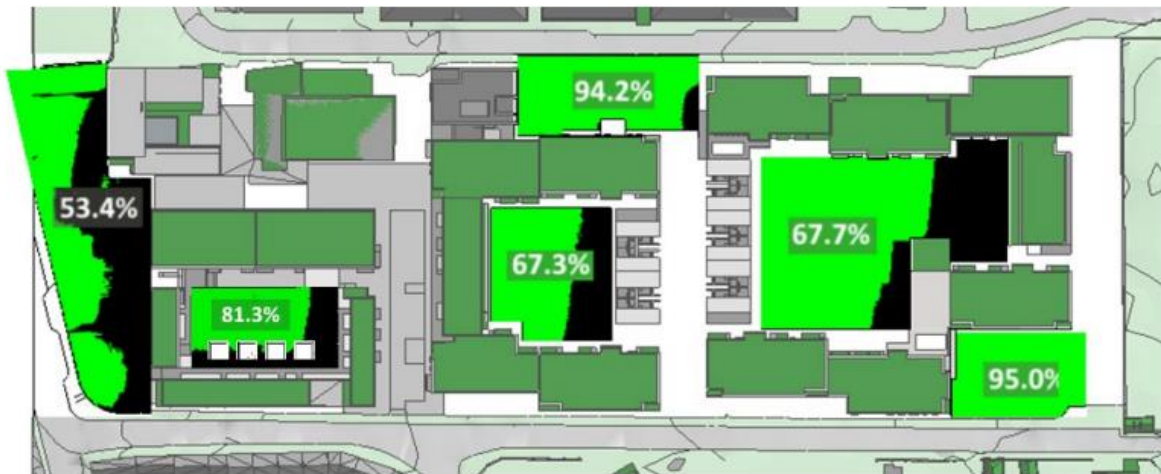
The proposed layout includes a series of streets, internal and external which will provide a sense of enclosure as well as passive surveillance throughout.

4. To provide well connected, high quality and active public and communal spaces

The proposed development's design includes a series of public open spaces and communal open spaces, which will enhance and integrate into the public realm, through the inclusion of a substantial public plaza at Emmet Road, which will be framed by the existing St. Michael's church to east as well as the proposed new community hub/library to the south as well as the commercial Block C, which provides retail/café floorspace at ground floor level and a super market at first floor level.

The communal open spaces are framed by blocks of varying heights (3-5-7 storeys) which reduces the massing and scale, and also allowing for the penetration of sunlight/daylight into the spaces.

As set out in the IN2 Sunlight Daylight Report, each of the amenity spaces easily achieve compliance with the BRE guidance of over 50% of amenity receiving two hours or more of sunlight on 21st March set out below:



We also refer the Board to the IN2 Microclimate report which states that *“the analysis undertaken identified that the proposed development was determined to not unduly impact on the local wind microclimate, with no adverse wind effects such as down-draft effects predicted to be introduced to the receiving environment.”*

The proposed development includes people friendly streets through the inclusion of own door access along the east west streets and activation along the north south streets with terraces included all to provide passive surveillance and overlooking of streets and open spaces.

5. To provide high quality, attractive and useable private spaces

The proposed development provides private open space in the form of terraces or balconies. As noted above the IN2 Microclimate report outlines that no adverse wind effects such as down draft effects are predicted. The orientation of the blocks is predominantly east west, which further enhances the amenity of the private spaces.

6. To promote mix of use and diversity of activities

The proposed mixed-use development will regenerate the subject site and will provide a mix of uses including retail, café, cultural (community hub/library) as well as a creche and open space. A Social Infrastructure Assessment has been prepared by John Spain Associates and is included with the Part X application.

7. To ensure high quality and environmentally sustainable buildings

The development has been orientated so as to maximise access to natural daylight. According to the IN2 Sunlight Daylight report, *“The analysis determined that 99% of KLD and Bedrooms – 1386 of 1404 rooms- throughout the proposed development would achieve the SDA targets in terms of SDA compliance.”*

For access to daylight the IN2 Sunlight Daylight report confirms *“a high level of compliance for Exposure to Sunlight, 97% of the spaces assessed were determined to be compliant,”*

Furthermore, the proposed development provides some 50.9% of dual aspect units which provides a high degree of amenity for future residents of the scheme.

As set out in the IN2 Energy Analysis report, the proposed development performs well in relation to sustainable heating of the scheme.

The proposed development includes robust high-quality finishes (mixture of brick and render) as set out in the Design Statement prepared by BMCEA.

The proposed development includes an integrated surface water management strategy and includes a range of SUDs measures in the design.

The SSFRA prepared by OCSC confirms that:

Based on the above, and the detailed information contained within this SSFRA, there is no apparent flood risk to the proposed development, nor as a result of the proposed development

8. To secure sustainable density, intensity at locations of high accessibility

The proposed density of 155 units per hectare is considered appropriate for the SDRA, as the subject site located in close proximity to public transport options (Luas to the south and Bus along Emmet Road) as well as a range of community and social infrastructure (as set out in the Community and Social Audit prepared by John Spain Associates, included with the Part X application

9. To protect historic environments from insensitive development

An assessment of the effects on built heritage receptors is included in an Architectural Heritage Assessment, report prepared by Blackwood Associates, and also Chapter 14 of the EIAR, Volume 1. The AHIA outlines that:

“The main residual effect on the architectural heritage is the change of use of the large open site, much of which is occupied by the large green open space that once contained the former Richmond Barracks parade ground, the Keogh Square and later St. Michael’s Estate housing scheme. The views southwards towards Goldenbridge Cemetery along St. Vincent’s Street West and Patriots Path will be permanently obscured by the new development. The remaining section of the Boundary Wall be will permanently altered. Loss of fabric has to be balanced with overall amenity of the wall presentation – ability of the existing masonry, when modified, to contribute at ground and at roof level to overall positive visual and social amenity of the scheme. Removal of connections to defensive barracks wall allows for more generous connections and visual spatial improvements at junctions. Existing historic buildings will remain a backdrop to new building to the west. Large green space to west of historic buildings will provide breathing space across Patriot’s Path.”

10. To ensure appropriate management and maintenance

We refer the Board to the enclosed Operational Management Plan prepared by Hooke Mac Donald included with the Part X application which sets out a framework of the operational management of the proposed development. In addition, a Lifecycle Report, prepared by BMCEA Architects is included which provides detail in relation to the maintenance and durability of buildings.

7.2.16.4 Density

Appendix 3 of the City Plan sets out the strategic approach for height and density. As a general rule, the following density ranges will be supported in the city.

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

The proposed density of 155 units per hectare is in accordance with the density range of 100-250 units per hectare indicated in the Draft City Plan for SDRAs.

7.2.16.5 Plot Ratio & Site Coverage

Table 2 of Appendix 3 sets out Indicative Plot Ratio and Site Coverage ranges:

Area	Indicative Plot Ratio	Indicative Site Coverage
Central Area	2.5-3.0	80-90%
Regeneration Area	1.5-3.0	50-60%
Conservation Area	1.5-2.0	45-50%
Outer Employment and Residential Area	1.0-2.5	45-60%

The proposed development has a plot ratio of 1:1.53 (based on 3.72 ha.) and a site coverage of c. 33.8%, which reflects the extensive areas of open space and communal areas for the proposed development.

7.2.16.6 Architectural Design Statements Applications

The Draft City Plan notes that developments of 30+ residential units should be accompanied by an Architectural Design Statement. An Architectural Design Statement has been prepared by BMCEA and is submitted with this application which addresses the relevant considerations of Chapter 15.

7.2.16.7 Green Infrastructure and Landscaping

A Landscape Design Statement has been prepared by BSLA which details the landscape plans for the proposed development and outlines planting and landscaping proposals are incorporated into landscape plans.

“The following measures to strengthen the city green infrastructure (GI) network plan will be required.

- *Increase habitat protection to support the wider GI network.*
- *Provide additional green space to meet deficiencies in connectivity of the GI network.*
- *Ensure retention of mature habitats and provide for long-term ecological succession.*

- *Increase connections and improve accessibility for pedestrians and cyclists to the wider GI network.*
- *The use of drainage systems (SuDs) and soft/ nature-based engineering solutions for surface water management to control the rate of run-off, protect water quality and mitigate the environmental impacts of flooding and erosion.*
- *Provide for public access to ensure that the benefits of access to the GI network is available to all citizens.*
- *Ensure that proposed developments do not create negative impacts on the existing GI network*

The proposed development will expand and improve the connectivity of the Green Infrastructure network in Dublin City through the use of green roofs, green space, planting and SuDs features. Further detail is provided in the BSLA Landscape Report and the OCSC Engineering Services report included with the application.

7.2.16.8 Green / Blue Roofs

Section 15.6.3 notes that all new developments of over 100 sq.m are required to include a green roof. The proposed development includes a green roof per these requirements. Please refer to the accompanying Landscape drawings prepared by BLSA and the OCSC Engineering Services Report for further details in this regard.

7.2.16.9 Public Open Space

Landscape Plans and Design Reports

Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.

Landscape design reports should address the following:

- *The protection and incorporation of existing trees and landscape features worthy of retention.*
- *The contribution of the proposed development to the landscape character and setting and open space amenity of the area.*
- *The value of ecological corridors and habitats surrounding the proposed development and the potential impact on these areas.*
- *The relationship between existing green corridors, public open spaces or area of high ecological values.*
- *The detail and specifications for materials, finishes and maintenance details.*
- *The integration of sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off – see Appendix 12 and 13.*
- *The hierarchy of different types of planting throughout the development in order to give visual variety. Green roofs, walls and permeable surfaces will be encouraged and required in certain instances (see Chapter 10 and Appendix 11).*
- *The details of ecosystems services and biodiversity including pollinator friendly approach.*
- *The maintenance and management strategy for the landscaped features.*

A Landscape Design Statement and drawings have been prepared by BSLA, included with the Part X application which addresses the detail above, where relevant.

7.2.16.10 Public Open Space and Recreation

Public open space should utilise a combination of hard and soft landscaping to cater for a wide range of needs such as children's play, passive recreation and sporting facilities. Where adjacent to canals or rivers, proposals must take into account the functions of a riparian corridor and possible flood plain,

All applications which include areas of open space should refer to the Dublin City Council Parks Strategy 2017-2022 or any further iteration for guidance on the design and aspirations for city parks. Planning applications including any open space area (public or communal) should incorporate green infrastructure strategies including SuDS, flood management, biodiversity, outdoor recreation, connection and carbon absorption in accordance with Policy GI24 of the plan.

In areas with a deficit of public open space in the city centre, SuDS proposals will be supported where it can be demonstrated that they have positive recreational and biodiversity functions. Any SuDS proposal that would negatively impinge on the conservation objectives of a historic park will not be supported.

The planning authority will seek the provision of public open space in all residential schemes (see Section 15.8.6) and commercial developments in excess of 5,000 sq. m. Dublin City Council will seek the following in the delivery of public open space:

- *The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.*
- *Open space should be overlooked and designed to ensure passive surveillance is achieved.*
- *The space should be visible from and accessible to the maximum number of users.*
- *Inaccessible or narrow unusable spaces will not be accepted.*
- *The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16.*
- *Any new public open space on the site should be contiguous to existing open space or natural feature (i.e., river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks.*
- *Protect and incorporate existing trees that are worthy of retention into the design of new open spaces*
- *Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.*
- *Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated biodiversity areas or wetlands which can reduce / better manage surface water run-off.*
- *Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12).*
- *Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.*
- *Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.*
- *Age friendly measures should be incorporated into the design.*
- *Permeability and accessibility for all users, particularly disabled persons should be provided.*
- *Cycle and pedestrian friendly routes should be accommodated.*

Please see detail above in regard to proposed SuDS and set out in further detail within the Engineering Services Report. Permeable services are included where possible. The rationale, design and layout of the open space has been set out within the BSLA Landscape Design Report, proposed open spaces. The proposed development provides some 19.4% public open space as well as additional communal open space (for residents only).

7.2.16.11 Climate Action and Energy Statement

The Draft City Plan requires that:

“New developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.

In response to the above requirement An Energy Analysis Report including Climate Action and Energy Statement has been prepared by IN2 and is included with the Part X application.

7.2.16.12 Community and Social Audit

The Draft City Plan requires that:

“All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development.

A community and social audit should address the following:

- *Identify the existing community and social provision in the surrounding area covering a 750m radius.*
- *Assess the overall need in terms of necessity, deficiency, and opportunities to share/enhance existing facilities based on current and proposed population projections.*
- *Justify the inclusion or exclusion of a community facility as part of the proposed development having regard to the findings of the audit.”*

A Community and Social Audit has been prepared by JSA and is enclosed with this application. This report assesses an area of 1.5 km from the subject site and demonstrates the existing provision of social and community facilities in the area. A range of community facilities have been included in the proposed development including a community hub/library as well as creche.

7.2.16.13 Schools

The Draft City Plan requires that:

“Planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand. In the case of very large-scale developments (800+ units), the phased completion of the dwellings must be linked with the provision of new schools”

A school demand assessment has been prepared as part of the Community and Social Audit which shows that the local primary and secondary schools can be accommodated by the proposed development.

7.2.16.14 Childcare

The Draft City Plan requires that:

“A minimum of 20 child spaces for every 75 dwellings units, shall be provided in all new mixed use and residential schemes.

As part of the community and social audit, an assessment of the childcare facilities in the surrounding 1km radius of the proposed should be included. The analysis should have regard to:

- *The make-up of the proposed residential area, i.e., an estimate of the mix of community that the housing area seeks to accommodate (if an assumption is made that 50% approximately of the housing area will require childcare, how does the proposal contribute to the existing demand in the area).*
- *The number of childcare facilities within walking distance (i.e., 1km) of the proposal.*
- *The capacity of each childcare facility and the available capacity by completion of the project.*
- *The results of any childcare needs analysis carried out as part of the city childcare strategy or carried out as part of a local or area action plan or as part of the development plan in consultation with the city childcare committees, which will have identified areas already well served or alternatively, gap areas where there is under provision, will also contribute to refining the base figure.*

Childcare facilities should also be located in existing residential areas, business/technology parks, industrial estates, areas of employment and within office blocks, with such provision being established having regard to the Dublin City Childcare Committee audit and needs analysis (for full details, see Childcare Facilities, Guidelines for Planning Authorities 2001).”

Design Criteria:

All childcare facilities are required to provide private outdoor play space or demonstrate safe and easy access to a safe outdoor play area. Such outdoor space should be appropriately sites to be protected from air pollution – see objective QHSNO16. The internal design, layout and size of the childcare facility shall be in accordance with the standards set out in the Childcare Facilities, Guidelines for Planning Authorities 2001.

Safe and secure access should also be provided in terms of pedestrian and cycle movements in association with public transport services in the area. Associated vehicular drop off will also be required in certain locations. This should be accompanied by a traffic and transport assessment which sets out the need to accommodate vehicular movements.”

The childcare requirement on the basis of 1 facility catering for 20 places per 75 No. units (excluding studio and 1 bed units) would be 78 no. places. The proposed development of a creche/childcare Facility of c. 816 sqm can cater for the proposed development (and 78 no. places). It is noted the layout provided by BMCEA is indicative and subject to change depending on the creche operator’s requirements and the number of children may increase (depending on mix of ages). Please see Community and Social Audit, prepared by John Spain Associates for further details.

7.2.16.15 Public Open Spaces

The following is noted as required:

Table 15-4: Public Open Space Requirements for Residential Development

Landuse / Zoning	Requirement (minimum)
Residential development (Z1, Z2, Z3, Z4, Z5, Z6, Z8, Z10, Z14)	10%
Residential development (Z12) (Z15)	25%

The proposed development will provide for 0.72 hectares of public open space (as detailed in the Architectural Design Statement/Schedules) which is in excess of the required 10% (19.4% provided).

7.2.16.16 Apartment Development - Floor Areas

Section 15.9 of the Draft City Plan defers to SPPR 3 of the Apartment Guidelines for minimum floor areas for apartments. SPPR 3 of the Apartment Guidelines 2020 states that the following minimum floor areas for apartments apply:

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

The HQA and drawings prepared by BMCEA Architecture, which accompany this Part X application, demonstrate that the proposed development complies and exceeds the standards outlined in the Sustainable Urban Housing: Design Standards for New Apartments 2020, with all units in excess of the minimum requirements outlined above. The proposed development includes an extensive emphasis on including larger units, with the vast majority exceeding the minimum standards for area by at least 10%. Section 6.2.2 above provided further detail in respect of compliance with the Apartment Guidelines 2020.

7.2.16.17 Apartment Development - Unit Mix and layout (

Section 15.9 of the Draft City Plan sets out the standards for apartment standards in respect of mix and notes that SPPR1 of the Apartment Guidelines 2020 is applicable to the Dublin City administrative area. The Draft City Plan identifies 2 no. areas comprising (i) the Liberties and (ii) the North Inner City, with a different requirement. The site of the proposed development is not located in either of the 2 no. areas, and as such the Apartment Guidelines 2020 on mix apply to the subject site.

It is also noted that the Draft City Plan outlines that Part X residential schemes may propose a different mix:

‘Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department’.

‘Standards may be relaxed for other social housing needs and/or where there is a verified need for a particular form of housing, for example for older people, subject to the adjudication of the Housing & Community Services Department’.

The development contains the following mix of apartments which is in compliance with SPPR1 of the Apartment Guidelines 2020.

- 110 no. studio apartments (19%)
- 172 no. 1 bedroom apartments (29.8%)

- 250 No. 2 bed apartments (43.2%)
- 46 No. 3 bedroom apartments (8%)

Section 15.9 of the Draft Plan also notes that *“the majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area types, by a minimum of 10% (any studio apartments must be included in the total but are not included as units that exceed the minimum by at least 10%). {In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people and people with disabilities.}”*

The proposed development accords with the requirement to have the majority of units at least 10% greater than the minimum sizes (51% of units exceeding the minimum requirement by 10% or more).

As required under current Building Regulations, all of the proposed units within the development have been designed to be compliant with Technical Guidance Document M of the Building Regulations 2010, and the Apartment Guidelines 2020. The design includes appropriate accessible parking spaces, dipped kerbs, tactile paving and other landscape features which improve accessibility for a wide variety of users with impaired mobility.

7.2.16.18 Apartment Development - Dual Aspect

The Draft City Plan notes that 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate. In prime city centre locations, adjoining or adjacent to high quality, high frequency public transport, 33% dual aspect may be accepted in locations where there are specific site constraints such as tight urban infill sites up to 0.25ha or where there is a need to maintain a strong street frontage. In the outer city (beyond the canal ring) and within the SDRA's, schemes with a minimum of 33% dual aspects units will only be considered in exceptional circumstances.

The proposed development provides for an overall of 50.9% dual aspect units, well in excess of the 33% requirement of the apartment guidelines for such locations and is an appropriate design response to the subject lands. A Housing Quality Assessment prepared by BMCEA is submitted as part of this application which demonstrates compliance with the applicable standards.

7.2.16.19 Apartment Development - Microclimate – Daylight and Sunlight, Wind and Noise

Daylight and Sunlight:

The following is noted in the Draft City Plan:

“A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme. A best practice guide for the assessment and methodology of Daylight and Sunlight Assessments.”

A Daylight and Sunlight Assessment Report has been prepared by IN2 which notes:

“The neighbouring buildings were assessed for both VSC, a measure of potential daylight, and Annual Probable Sunlight Hours, a measure of direct sunlight. The VSC assessment determined that there would be no negative impact as a result of the proposed development. The Annual Probable Sunlight hours and Winter Sunlight Hours assessments determine the annual sunlight impact on a window and the winter sunlight impact through a quantitative assessment. The APSH assessment determined that there would be no negative impact to neighbouring dwellings as a result of the proposed development.”

Wind:

The following is noted in the Draft City Plan:

“A wind assessment will be required in certain circumstances where taller buildings are proposed or where there is potential for wind tunnelling in order to analyse the pedestrian wind comfort levels received in proposed balconies, communal amenity spaces, roof gardens and at the entrance points to the scheme.”

A Microclimate assessment has been carried out by IN2 which concludes:

“Therefore overall, as per the Urban Development and Building Heights Guidelines (2018), the analysis undertaken identified that the proposed development was determined to not unduly impact on the local wind microclimate, with no adverse wind effects such as down-draft effects predicted to be introduced to the receiving environment.”

7.2.16.20 Apartment Development - Block configuration / Lift and Stair Cores

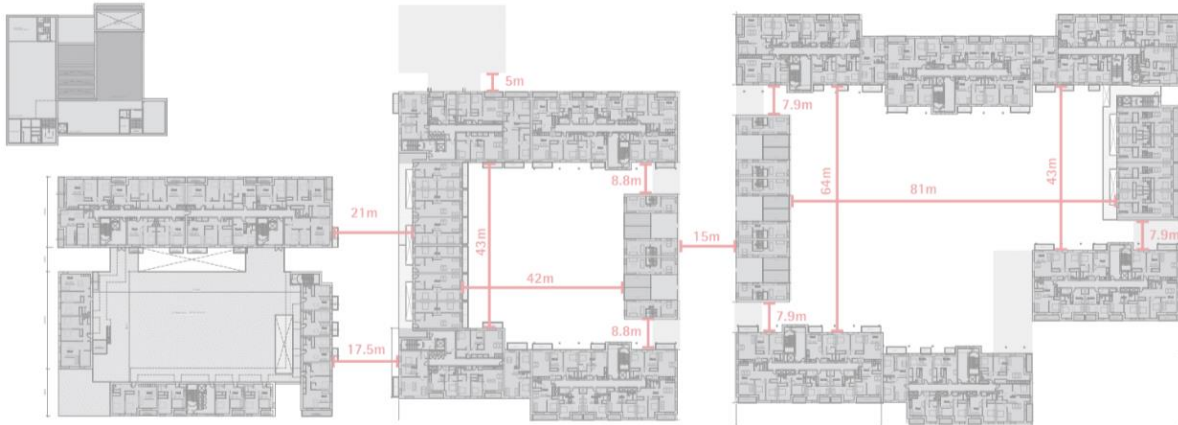
Section 15.9.5 of the Development Plan states that there shall be a maximum of 12 units per core per floor, consistent with the Apartment Guidelines.

The proposed number of apartment units per floor per core within the scheme is 8 which is well below the threshold set out in the Apartment Guidelines as expressed in the draft Development Plan.

7.2.16.21 Apartment Development - Separation distances (apartments), Overlooking and Overbearance

Section 15.9.17 and 15.9.18 of the Draft City Plan provides guidance on separation distances and the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home.

In terms of separation distances, the Draft City Plan states that traditionally a minimum distance of 22m is required between opposing first floor windows. The submitted drawings by BMCEA Architects demonstrates separation distance at ground floor level. Where the distances are below 22m the design avoids direct windows facing each other.



7.2.16.22 Car Parking

The proposed development is located in parking zone 3. Table 2 of Appendix 5 of the Draft City Plan sets out a maximum standard of 1 space per dwelling for apartments, 1 per 150 sq.m of seating area for cafes, and 1 per 100 sq.m of office space.

The proposal also includes 106 no. car parking spaces comprising 50 no. car parking spaces for the residential and the remainder allocated to the other uses including accessible spaces car share spaces and 10% Electric Vehicle charging points. The car parking spaces will be predominantly provided in a Village Mobility Hub located beneath the supermarket. Car parking spaces will also be located adjacent to Goldenbridge Cemetery. Further detail is provided in the Traffic and Transportation Assessment and the Mobility Management Plan, both prepared by OCSC, included in the Part X application.

7.2.16.23 Flood Risk Management

The following is outlined in the Draft City Plan:

“All applications for developments in flood risk areas shall have regard to the Strategic Flood Risk Assessment of this plan. All applications within flood zones A and B will be required to submit a Site-Specific Flood Risk Assessment to an appropriate level of detail (see Policy SI15 and SI16).”

Potential applicants should ensure consideration of residual risk without regard to any existing flood protection structures. Dublin City Council will assess planning applications with regard to the vulnerability classes of land-use and development types in accordance with the national guidelines. Potential applicants should refer to these and demonstrate adherence to them.

In relation to rivers, potential applicants should give consideration to potential river channel impacts, adhere to the Inland Fisheries Ireland guidance and ensure access for wildlife to the river where possible.”

A Site-Specific Flood Risk Assessment has been prepared by OCSC which demonstrates no risk of flooding to the proposed development, as the main development site is classified as being located within Flood Zone C.

7.2.16.24 Appendix 1 Housing Strategy Incorporating Interim Housing Needs Demand Assessment (HDNA)

As outlined in Appendix 1 of the Draft City Plan, “*the housing strategy in combination with the interim HNDA informs the housing policies and objectives of the Dublin City Development Plan and provides detail in relation to housing provision, location, requirements for different house types, sizes and tenures and the requirements of zoned land which cater for housing for future populations.*”

Section 2.2 of the Housing Strategy indicates 3 core principles that inform and guide the overall core strategy

- *To ensure the provision of good quality housing across owner occupied and rental housing tenures in sustainable communities.*
- *To ensure the planning and building of housing and residential space in the city contributes to sustainable and balanced development.*
- *To ensure adequate provision of social and affordable housing (i.e., social and cost rental and affordable purchase) for households unable to afford housing from their own resources. (Emphasis added).*

The Housing Strategy sets out that “*compact neighbourhoods help ensure a critical mass of people can use and contribute to the viability of local residential infrastructure particularly as it relates to local social, economic, amenity, cultural and transport infrastructures. Planning for the production of compact, quality, accessible and affordable residential neighbourhoods must, therefore, ensure the realisation of the following key criteria for successful spaces and places to live and make a home:*

1. Affordable dwellings for social, cost rental and purchase to ensure a mixed-income profile that will reduce undue social segregation in any compact neighbourhood.”

The proposed development at Emmet Road will provide a sustainable mixed tenure development which will include social and cost rental apartments, within a high-quality designed scheme, at Inchicore.

7.2.16.24.1 HNDA Forecasts

The interim HNDA for the Dublin City Development Plan 2022-2028, forecasts that housing need in the Dublin City administrative area will comprise 27,219 households over the plan period comprising

- *10,247 social rented households;*
- *4,997 households in the owner-occupied sector*
- *4,088 in the private rented sector; and,*
- *7,887 ‘affordability constrained’ households who are ineligible for social housing but face affordability challenges in the private market.*

The proposed development will contribute towards achieving social rented households as well as ‘*affordability constrained*’ households. The cost rental model is designed to cater for such households.

The interim HNDA sets out that the social and ‘*affordability constrained*’ components of the projected extent of ‘*housing need*’ during the plan period “*relates only to the additional anticipated households during that time and, thus, is in addition to the current extent of unmet need as per the existing social housing waiting list.*”

7.2.16.24.2 Housing Strategy and Cost Rental

The Affordable Housing Act 2021 requires housing strategies to include an estimate of the amount of Social, Affordable Purchase and cost rental housing which is required in the local authority area during the period of the development plan.

According to the Housing Strategy, Households with less than the maximum household income eligibility for social housing (€35,000 a year in Dublin City) are assigned to social housing. Households above this threshold who cannot afford to purchase or rent privately are assigned to the ‘*affordability constraint*’ category.

Figure 7.11 - Estimated Social, Affordable Purchase & Cost Rental Housing Need over Plan Period

Tenure	Total
Social Rental Housing	10,247
Affordable Purchase & Cost Rental Housing	7,887

Source KPMG FA Table 39 HNDA

The cost rental element of the proposed development at Emmet Road will contribute towards achieving the cost rental targets contained in the Housing Strategy.

Section 7.3 of the Housing Strategy notes that urban regeneration proposals (such as the subject site at Emmet Road) will play a key role in delivering new homes in the city.

According to the Housing Strategy “*Dublin City seeks to maximise its overall public housing provision of social, cost rental and affordable purchase housing provision in a manner that contributes to sustainable communities and healthy place making.*”

In summary, the HNDA finds that for the years 2023 to 2028, “*about 38% of new households will need social housing, 15% will be able to buy a home, 18% will be able to rent, and 29% will need affordable housing (such as cost rental or affordable purchase). The population of Dublin City will grow to 638,000 in 2031, and there will be over 52,000 new households in Dublin City between 2020 and 2031.*”

8.0 CONCLUSIONS

This report has been prepared by John Spain Associates to set out the planning and development context for the proposed Part X mixed use development at Emmet Road, Inchicore, Dublin 8.

The proposal introduces a high-quality development, on an underutilised site, which is zoned Z14 in the current Dublin City Development Plan 2016-2022 and the Draft Dublin City Development Plan 2022-2028, which supports a mix of uses and a greater intensity of development. The design and scale of the proposed development has sought to respond to and respect the surrounding context and seeks to make a positive contribution to this inner-city neighbourhood through the provision of public open space, new pedestrian streets and permeability through this substantial urban block. The layout and design of the development seeks to enhance the streetscape and integrates appropriately with the surrounding context, whilst proposing a high-quality new architectural addition to the area which is of a greater scale and massing to the existing context, as supported by national planning policy documents.

The proposed development is considered to fully comply with the relevant national and regional planning policy context. In particular, the appropriate development of the subject site would represent an effective and efficient use of a currently under-utilised urban site and would therefore be in full compliance with the National Planning Framework, the RSES for the EMRA 2019 and the Dublin City Development Plan 2016-2022 and Draft Dublin City Development Plan 2022-2028.

The proposed development will accommodate the development of a new sustainable community within Inchicore, which will be capable of integration into the existing and proposed new neighbourhood structure with adequate pedestrian and cycling connectivity, apartment services and facilities and significant communal open space.

In addition, the application site is strategically located within southwest of the city and is well served by high quality public transport services (Luas and bus) and as such represents an appropriate location for more intensive employment and residential uses, thus ensuring that the development complies with the objectives of the Greater Dublin Area Draft Transport Strategy 2022-2042.

The proposed development complies with the relevant provisions of the Section 28 Guidelines comprising the Sustainable Urban Housing: Design Standards for New Apartments 2020 and the Urban Development and Building Heights Guidelines for Planning Authorities 2018.

Having regard to the above, it is respectfully submitted that planning permission should be granted for the proposed development.

In light of the above information and supporting reports and assessments, the proposed development is considered; consistent with strategic national, regional and local policy objectives in terms of residential development; and, consistent with the proper planning and sustainable development of the area.

Appendix 1 – Housing Mix Planning Policy Summary & Hooke Mac Donald Housing Mix Report

SUMMARY OF PLANNING POLICY

There is a significant and established housing need in the Greater Dublin Area, including Dublin City, and the State as a whole, as recognised within Government housing and planning policy, including the 2016 Rebuilding Ireland Plan for Housing and Homelessness and Housing for All 2021, published in September 2021, which reinforces the critical and strategic need for new dwellings where it is a target to provide 300,000 housing units by the year 2030. The proposed development provides a mix of cost rental and social apartments.

The development of the lands at Emmet Road will contribute towards providing affordable cost rental housing, social housing apartments in tandem with cultural (community hub/library), community, retail and childcare floorspace within a high-quality mixed-use development, in close proximity to public transport options (Luas and bus).

Cost rental tenure in Ireland was introduced *via* the Affordable Housing Act 2021. The Affordable Housing Act aims to increase the stock of affordable housing through the introduction of a number of initiatives.

The development contains the following mix of apartments:

- 110 no. studio apartments (19%)
- 172 no. 1 bedroom apartments (29.8%)
- 250 No. 2 bed apartments (43.2%)
- 46 No. 3 bedroom apartments (8%)

The proposed development provides a mix which includes 24% social housing units (137 no. units) and 76% cost rental units (441 no. units). It is also noted that the DCC site (1b) adjacent to the proposed development includes 52 no. older persons accommodation (social units) which would result in a 30% social housing mix to 70% cost rental across the 2 no. sites.

National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

The NPF recognises that *"currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms."*

The proposed development at Emmet Road includes a sustainable mix of dwellings which will contribute to addressing the shortfall in suitable studio, 1 bedroom, 2 bedroom and some 3-bedroom units, identified in the NPF.

Apartment Guidelines 2020

The 2020 Apartment Guidelines state the following in relation to housing formation and demand for apartments at paragraphs 2.6 to 2.17:

- *Two thirds of households added in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type.*

- *There is a deficit of approximately 150% in dwellings for 1-2 person homes when compared to the number of 1-2 person households.*
- *The 2016 census reveals that 1-2 person households now comprise a majority of households, with this trend set to continue, yet Ireland is an outlier in the EU, with only one quarter the EU average of apartments as a percentage of housing stock.*
- *While household size is decreasing, the percentage of elderly people (i.e., potential down-sizers) is increasing.*

Paragraph 2.14 states *“While making appropriate provision to meet housing need is the key consideration, viability must also be considered, especially where there is clear evidence available. For example, research work undertaken by the Department of Housing, Local Government and Heritage with input from industry and construction professionals analysing the cost of housing delivery, confirms that in a given apartment scheme that includes a proportion of three bedroom units, replacing these units to allow larger number of one- and two-bedroom units would, contribute to greater scheme viability.”*

The Emmet Road mixed use development responds to the commentary above in providing a sustainable mix of apartment units and meeting identified housing needs and in particular the delivery of suitable housing catering for 1-2 person households.

Dublin City Development Plan 2016-2022

Section 16.10 of the City Plan sets out the standards for residential accommodation. The standards for apartment developments are set out in the Department of Environment, Community and Local Government guidelines entitled Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (December 2015).

With reference to the mix in apartment developments, the City Plan notes that each apartment development shall contain a maximum of 25-30% one-bedroom units and a minimum of 15% three or more bedroom units.

The City Plan also highlights that:

“These maximum and minimum requirements apply to proposals of 15 units or more and may not apply to certain social housing needs and/or where there is a need for a particular form of housing for older people and students having regard to the housing strategy.”

According to the Housing Strategy, the mix of unit sizes may vary for social housing schemes where a particular housing need has been identified:

“Minimum standards for residential mix and unit size shall be in accordance with the residential standards set out in Chapter 16: Development Standards of the development plan. The mix of unit sizes may vary for social housing schemes where a particular housing need has been identified.”

The unit mix for the social units has been informed by the social housing requirements of Dublin County Council. The current social housing requirements for area J (which is a Dublin City Council Housing Department’s administrative area for the site) are provided in the Hooke Mac Donald report below.

Dublin City Development Plan 2022-2028

The following policies support the proposed tenure mix at Emmet Road, where the Council is seeking a

‘greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing’. (Emphasis added)

“QHSN32 Social, Affordable Purchase and Cost Rental Housing

To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council’s Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH ‘Social Housing Strategy 2020’ and support the realisation of public housing.

QHSN33 Diversity of Housing Type and Tenure

To support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing”.

Additionally, the council notes the need to cater for a mix of tenures:

“Delivering good quality housing to cater for diverse housing needs - mix of tenures and typologies to meet people’s full lifecycle and avoidance of large areas of mono use developments”.

The proposed development at Emmet Road comprises a mixture of cost rental and social housing which is a key element in providing a diversity of tenure and housing type.

Section 15.9 of the Draft City Plan sets out the standards for apartment standards in respect of mix and notes that SPPR1 of the Apartment Guidelines 2020 is applicable to the Dublin City administrative area. The Draft City Plan identifies 2 no. areas comprising (i) the Liberties and (ii) the North Inner City, with a different requirement. The site of the proposed development is not located in either of the 2 no. areas, and as such the Apartment Guidelines 2020 on mix apply to the subject site.

It is also noted that the Draft City Plan outlines that Part X residential schemes may propose a different mix:

‘Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department’. ‘Standards may be relaxed for other social housing needs and/or where there is a verified need for a particular form of housing, for example for older people, subject to the adjudication of the Housing & Community Services Department’.

The interim HNDA for the Draft City Plan 2022-2028, forecasts that housing need in the Dublin City administrative area will comprise 27,219 households over the plan period comprising

- 10,247 social rented households;
- 4,997 households in the owner-occupied sector
- 4,088 in the private rented sector; and,
- 7,887 ‘affordability constrained’ households who are ineligible for social housing but face affordability challenges in the private market.

The proposed development will contribute towards achieving social rented households as well as *'affordability constrained'* households. The mix of tenure is designed to address the forecasts contained in the Draft City Plan.

Conclusions

The proposed development at Emmet Road seeks to provide for more affordable units and increase the supply of rental apartment units with long-term security of tenure as well as providing social housing units.

With reference to the proposed development at Emmet Road, the social housing tenure mix comprises some 24% (137 no. dwellings) of the overall number of units and consists of 61 no. 1 bedroom apartments (45%), 55 no. 2 bedroom apartments (40%) and 21 no. 3 bedroom apartments (15%).

The mix of tenure at the proposed development at Emmet Road will help meet some of the demand from those who do not meet the social housing eligibility criteria but are unable to afford current market rents or obtain a mortgage.

It is submitted that the proposed development, comprising cost rental social housing is justified, not only from a need and demand perspective, but also having regard to existing policy provision both at national and local level, and the location of the site in proximity to existing and planned services and facilities in Inchicore. It is considered the proposed development is in accordance with the proper planning and sustainable development of the area.

Hooke Mac Donald Report



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Emmet Road Development

Residential Market & Demographic Report for Dublin City Council

20th September 2022

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1. Executive Summary

1.1 Receiving environment / Urban context (transport, schools, amenities)

The Emmet Road site is located on the south side of Emmet Road, immediately west of the former Richmond Barracks and north of Goldenbridge Cemetery in Inchicore, Dublin 8; on the south-western side of Dublin city. Inchicore is primarily comprised of mature residential housing stock, with a number of apartment developments completed over the past 20 years.

The commercial centre of Inchicore is located to the west of the site at the junction of Emmet Road and Tyrconnell Road. It mainly comprises independent local retail, bars, take-aways, ethnic stores, discount and charity stores. There is a Eurospar and a Tesco Express at either end of Inchicore village.

Located within 500 metres of the site, there are approximately five childcare facilities, three primary schools, one secondary school and a College of Further Education.

The Luas Red line services the location; Drimnagh Luas Stop is located on the Grand Canal and approximately 150 metres to the south of the site, Goldenbridge Luas Stop is located approximately 200 metres to the southeast, while Heuston Train Station, which provides rail connectivity to the southwest of the country, is located approximately 1.75 km to the northeast. The area is well-served by several Dublin Bus routes, and a future Bus Connects route, providing direct access to the City Centre and suburbs. There is cycle way along the Grand Canal that provides cycle paths directly into the city centre, which is also accessible through several walking routes.

Image 1.1.1 – Aerial view of Emmet Road site (including main green area) and surrounding neighbourhood



1.2 Unit types: highest demand, limited demand, viability

Affordability is the biggest factor impacting demand for types of accommodation in Dublin. Most people in the rental market would welcome the opportunity to have their own accommodation and not have to share with others. As a result, studio and one-bedroom apartments are very popular, however, as rents have continued to increase renters are having to share and rent two- and three-bedroom apartments or houses, where houses are available. Based on demographic research, the majority of demand is from one, two or three person households.

Two-bedroom apartments are popular with sharers as the option provides a more affordable accommodation than renting a studio or one-bedroom apartment. They are also popular with young families.

Typically, there is limited demand in the rental market for three-bedroom, and even less so four-bedroom, apartments in Dublin. They have become popular with sharers as a result of the relative affordability of the accommodation but families, if they have the choice, would choose to live in a house with a garden. This is not possible in urban areas and families are encouraged to avail of apartment stock. Over 60% of the housing stock in the Dublin City Council area, and Inchicore specifically, where the Emmet Road site is located, comprises houses, rather than apartments, with much of the city being two storey accommodation.

National planning policy is seeking to drive density in urban areas and there is limited opportunity to build houses, therefore apartments are the predominant housing development type being planned in and around Dublin city. As a result of building cost increases over the last 4 or 5 years, and in particular over the last 18 months since Covid-19, viability for apartment development is very challenging. The pandemic continues to impact feasibility for development sites across Dublin. Despite there being thousands of planned apartments in the system, as a result of viability many of these will not be built. Forecasts around significant apartment completions in Dublin over the coming years are likely to be challenging to be achieved based on the practicalities of financing, costs and delivery.

1.3 Mobility Strategy

As focus and policy both internationally and domestically continues to increase on addressing climate change and implementing sustainable development policies, consideration of how new development mobility strategies support these is becoming increasingly important.

The location of the Emmet Road site and inherent characteristics of the neighbourhood in which it is situated make it an ideal opportunity for the city to fulfil several of the aspirations in relation to addressing climate change and building sustainable developments and communities. The area has multiple options for non-car-based transport including the Luas, designated walking and cycle routes and bus options. As a result, there is the opportunity to deliver a new development with substantially reduced car parking provision, increased bicycle provision and the opportunity for good take-up of car sharing.

1.4 Childcare / Creche

The Planning Guidelines for Childcare Facilities (2001) recommends the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 residential units. However, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.

One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.

The standard market target floor area of a childcare facility typically extends from 500 - 800 sq.m (5,382 – 8,611 sq.ft). The proposed childcare facility at Emmet Road is planned to extend to approximately 816 sq.m (8,783 sq.ft). Therefore, the proposed creche is in line with the upper end of the expected standard market floor area. Typically, the childcare facility will be marketed in shell & core condition and include outdoor play zones within the development.

1.5 Planning in the Current Market

Stakeholders who are looking to secure planning permissions in the current environment continue to be frustrated by delays in the system. Not at an administrative level but in respect of the overall process. The Strategic Housing Developments (SHDs) approach in the planning system through An Bord Pleanála was devised to allow projects over 100 dwellings to fast track through the system; however, while many applications have been successfully approved, judicial reviews have delayed projects getting to site and seriously impacted supply.

New streamlined arrangements for large-scale residential developments (LSRDs) which restore decision-making to local authorities have been introduced to replace SHDs and there are mooted moves to have measures in place to ensure properly approved developments are not delayed by vexatious actions. The hope is that these actions will assist in increasing supply dramatically.

As referred to in section 1.2, it is likely that many of the planning applications in the system for apartments in Dublin will not be delivered as a result of viability issues.

2. Introduction

2.1 Government policy

In September 2021 the Government launched the much-anticipated new Government housing strategy, 'Housing for All' (HFA), 10-year housing plan replacing Rebuilding Ireland, the previous 5-year plan. Led by the Department of Housing, Local Government and Heritage (DHLGH), it is described by the Minister for Housing, Darragh O'Brien TD, as *"the largest state building programme in our history"*.

Housing for All is underpinned by two key pieces of legislation, namely the Affordable Housing Act 2021 and Land Development Agency Act 2021, both contain a range of policy measures to increase housing supply and affordability, aiming to address the following:

- Insufficient private sector residential accommodation to purchase or rent
- Lack of social housing state construction
- Unaffordable housing for a sizeable portion of the population
- Excessive cost to deliver new build homes
- Underutilised vacant residential stock
- Increased number of people experiencing or under threat of homelessness

Housing for All will strategically focus on every person having access to sustainable, good quality affordable housing to purchase and rent through the following directives:

- Supporting homeownership and increasing affordability
- Eradicating homelessness, increasing social housing delivery, and supporting social inclusion
- Increasing new housing supply
- Addressing vacancy and efficient use of stock

A recent major initiative in Housing for All is the proposed Croí Cónaithe (Cities) scheme, which is a viability fund whose objective is to help kick-start construction of apartment schemes, activating some of the estimated 70,000 un-commenced planning permissions in the five cities of Dublin, Cork, Limerick, Galway, and Waterford. The figure for un-activated permissions in Dublin is approximately 40,000, which is about four years of housing supply in the capital.

Housing for All also introduced 'Cost Rental', a new form of public housing in Ireland. The Cost Rental model must relate to affordability for low to middle income earners, for people who are above the social housing income limits, and who wish to rent or are unable to buy their own home. Under this tenure rents charged only cover cost of developing, financing, managing and maintaining the homes. Cost Rental will be targeted to achieve rents that are 25% below what they would be on the private market. The Government plans to provide an average of 2,000 Cost Rental homes per year for the next 10 years. This model of housing is a first in type initiative for Dublin City Council.

It is envisaged that Local Authorities and Land Development Agency will also become an integral part of CR delivery through development of State lands, Project Tosaigh and Local Authority turnkey acquisition.

*Figure 2.1.1 – Summary of Housing for All Plans
(Source: Housing for All – a New Housing Plan for Ireland)*



2.2 Economic climate

- In their latest economic review of the Irish economy, the Economic & Social Research Institute (ESRI) stated that while the Irish economy is continuing to perform strongly in 2022, it is clear that the growth rate for the present year will be somewhat more subdued than the exceptional performance in 2021.
- The ESRI's Quarterly Economic Commentary - Summer 2022 reported that they expect GDP to grow by 6.8 per cent this year, and 4.8 per cent in 2023, again driven by strong export growth. Modified domestic demand (MDD) is forecast to increase by 4.4 and 3.7 per cent for the same period, somewhat lower than the ESRI's previous Commentary.
- As pandemic-related supports have come to an end, the unemployment rate has eased considerably. The ESRI expect unemployment to fall further, reaching 4.3 per cent by Q4 2022 and averaging 5.0 per cent for the year. They anticipate an unemployment rate of 4.0 per cent in 2023.
- The ESRI stated that the strong labour market performance, along with the continued increases in Exchequer receipts, means that the Irish public finances are in a relatively robust state, notwithstanding the recent challenges posed by the pandemic and the Ukrainian crisis.
- However, there are significant challenges confronting the domestic economy; inflation has increased significantly and is set to exceed 7 per cent in 2022, before growing at a lower rate of 4.0 per cent in 2023.
- Inflation in an international context, coupled with uncertainty surrounding the conflict in Ukraine, is also set to impact the global economic outlook in this year and the next.
- The European Central Bank (ECB) has signalled that monetary policy rates are set to increase over the coming quarters. This will likely dampen investment sentiment and consumer spending. They quantify the impact of such an increase on Irish house price levels; they find that the proposed increase in interest rates will see Irish house prices fall by 2 per cent relative to what they would otherwise be, although demand-side characteristics, as well as a sluggish supply response, will continue to exert upward pressure on house prices.
- Policymakers must be particularly attuned to the difficulties posed by high inflation rates; there is still some fiscal space to assist those most affected by higher costs of living, however this must be done in a targeted manner.
- More generally, fiscal policy must be cautionary, particularly in terms of any increases in current expenditure. Similarly, reducing the taxation burden in the economy at this point would only serve to fuel inflationary pressures.

Challenges being seen and flagged in the economy and wider society include:

- Labour shortages in a number of sectors, especially construction, hospitality and transport are likely to be factors in the years ahead.
- Infrastructure constraints need to be addressed in order for Ireland's future prospects and growth not to be inhibited.

- Delays and costs in the planning system and difficulties being seen by developers and the State in efforts to scale up development of housing.
- Sustained homelessness and lack of affordability of housing for large portions of the population.
- Conservative housing completion targets versus increasing demographic demand and higher forecasts.
- Housing supply generally is an issue, both for rental and purchase.

2.3 Demographics Analysis Summary

The Irish population trends remain robust in comparison to other advanced economies. The Census Preliminary Results 2022 were published on 23rd June 2022 and indicated a population of 5.123 million on Census night, 3rd April 2022. The main results from Census 2022 are not expected to be published until 2023. This is the highest population figure since 1841 and the first time the population was over 5 million since the 1851 census. Ireland has the youngest population in Europe and is projected to increase by almost one million people to 5.75 million by 2040.

According to the last full Census results in 2016, Dublin City Centre has seen an increase in population of approximately 18.8% to 554,554 persons in comparison to 10.7% to 23,892 persons in the 2011 Census and this growth is anticipated to continue for the April 2022 Census.

There is pent up, unsatisfied demand in the residential sector and an increasing population that is forecast to deliver sustained demand into the future. The demand is supported by a number of demographic sectors of the market – singles, couples and young families, all of whom are attracted by the advantages associated with renting.

Currently, over 30% of the population of Dublin is now living in rental accommodation and this is likely to rise to over 40% over the next 5-7 years.

There has been a significant shortfall in apartment completions versus demand in Dublin over the last three years. There were a total of 6,226 new houses and apartments built in Dublin in 2021 of which 64% or 3,994 were apartments; compared to 41% or 2,175 apartments in 2020. This is the first time in over a decade that there have been more apartments built in Dublin than houses. Results from the first two quarters of 2022 show a total of 4,871 new houses and apartments built in Dublin, of which 68% or 3,333 were apartments.

The increase in apartment completions was attributed mainly to a strong performance in the second half of the year. It is clear that the lockdown of construction of private house and apartment building in the early months of 2021 was hugely detrimental to housing delivery. Even if this had not occurred the level of housing completions in the capital would still be significantly short of requirements when compared to the building demand from renters and buyers.

Both renters and owner occupiers are drawn to newly completed apartments that are finished and fitted out to high standards. Communal facilities are very attractive for both types of occupiers, providing additional space outside of their apartments to work and spend leisure time. With the move to working-from-home for many parts of the workforce as a result of Covid-19, developments that provide an opportunity for this are in demand.

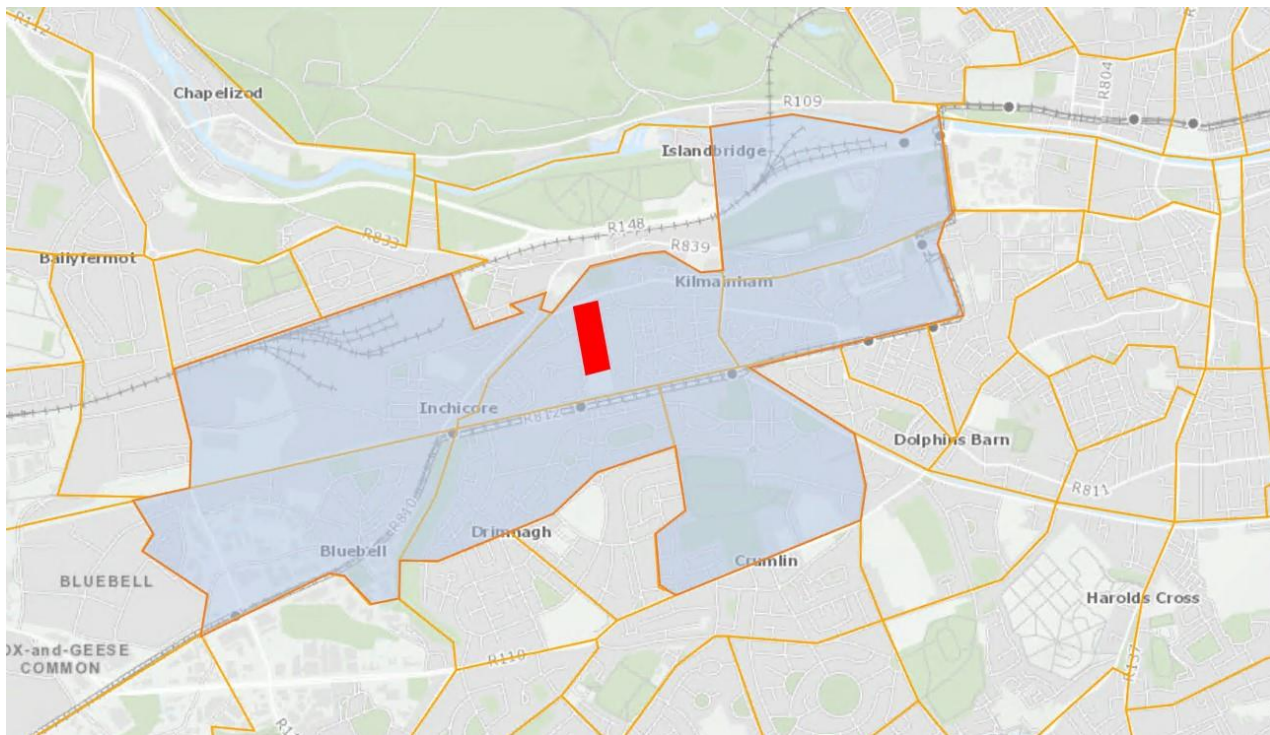
Developments that benefit from being managed professionally are appreciated by renters and occupiers also. In the rental market over the last 10 years there has been an increase in the number of institutional type professional landlords who own large elements of single developments or an entire scheme. This provides for a consistent level of professional tenancy and property management and tenants who have experienced this approach are choosing renting in these developments over renting from smaller landlords who often have varied approaches to property management standards and uncertain strategies in terms of long-term ownership and tenant occupancy.

It is proven that properties with good public transport and local amenities drives the demand. Typically, apartments are the preferred choice of accommodation by over 90% of renters and there is a current demand in Dublin from tenants for approximately 15,000 new apartments per annum.

The Emmet Road site is located in a well-established residential area. The site (Study Area) is situated within the ‘Kilmainham C’ electoral area. As part of the research for this report we analysed the Census 2016 results for the area surrounding the Study Area and compared these with results from the wider Dublin City Council (DCC) area. A summary of this review is contained in Appendix 1 to this report. The Study Area comprises the following electoral areas:

- Inchicore A
- Inchicore B
- Ushers A
- Ushers F
- Crumlin A
- Crumlin B
- Kilmainham C

Figure 2.3.1 – Study Area: Electoral Division Map



Demographic analysis (Census 2016) of the Study Area shows a slightly higher number of smaller household sizes compared with the DCC area averages. In the Study Area approximately 28.8% account for one-person households, 33.9% are two-person, 18% are three-person and 19.3% are four or more people. In the DCC area approximately 28.3% account for one-person households, 32% are two-person, 17.1% are three-person and 22.6% are four or more people.

The largest divergence in CSO household results between the Study Area and the DCC area occur in this category. Just over 40% of the DCC area’s housing stock was built prior to 1960, while the Study Area has a higher proportion of older housing stock with just over 50% built prior to 1960. While the DCC area witnessed steady development between 1960 to 2000, with 32.2% of all households built in this period, the Study Area witnessed only half of this development, with only 16% of its housing stock built in the same period. Perhaps as an indication of much-needed regeneration, the Study Area has a slightly higher proportion of housing built in the last 20 years than the DCC area average, accounting for 18.3% compared with 14.5% in DCC.

2.4 Residential Stock – Nationally & Locally

Residential completions in Ireland have been increasing over recent years as the economy and industry has continued to scale up housing supply since the major downturn in 2008, which devastated new housing supply and in particular apartments. The Covid-19 pandemic and related Government restrictions impacted supply in 2020 and 2021 but the industry is gearing up to continue to increase supply. However, multiple issues have been flagged by stakeholders as impediments to increasing supply over the coming years including costs of materials and supply chain issues, the cost and availability of labour, planning and infrastructure impediments.

Figure 2.4.1 below illustrates the number of new dwelling completions in Ireland by type of dwelling and comparing Q2 2021 to Q2 2022.

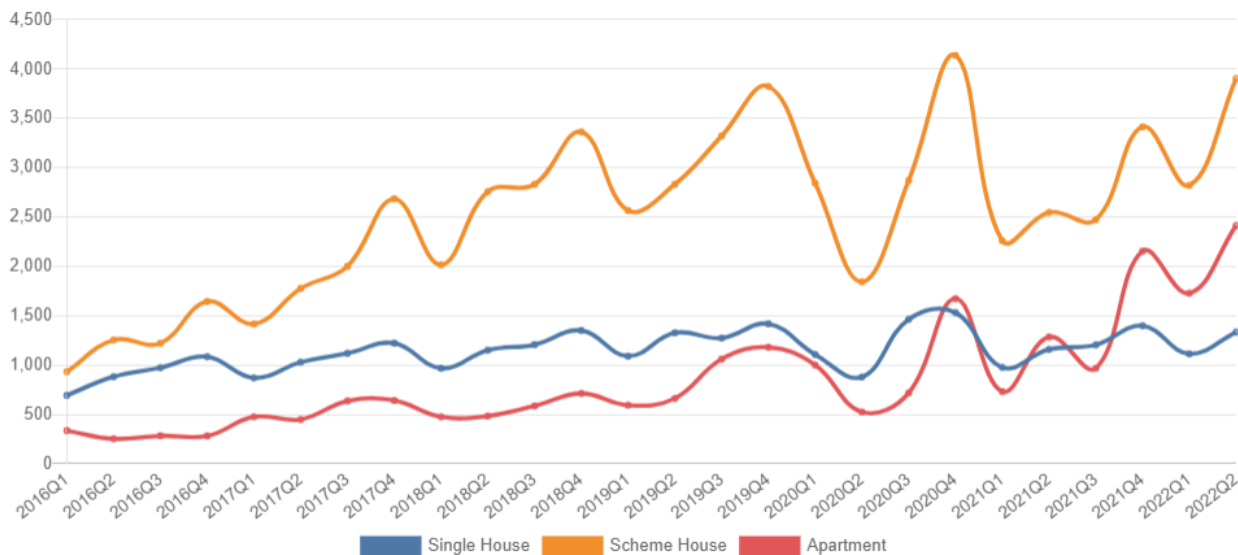
Figure 2.4.1 – Number of new dwelling completions by type of dwelling, comparing Q2 2021 to Q2 2022
(Source: CSO)

New Dwelling Completions				
	Single	Scheme	Apartment	Totals
Quarter 2 2021	1,159	2,547	1,284	4,990
Quarter 2 2022	1,334	3,905	2,415	7,654
% change	15.1%	53.3%	88.1%	53.4%

Notably approximately three-quarters of apartments completed in Q2 2022 were in Dublin. Viability is still the main issue impacting apartment development and supply.

Figure 2.4.2 – Number of new dwelling completions by type of dwelling Q1, 2016 – Q2, 2022

(Source: CSO)



The State needs to substantially increase supply and under the Government’s Housing for All strategy the plan is to increase the housing supply of all tenures to an average of 33,000 per year up to 2030. The project being planned for the Emmet Road site is the type of accommodation that Government policy has highlighted as being required i.e. on public land, higher density and aimed at providing affordable accommodation in a well-served urban location.

In terms of rental stock, across the State, approximately 85% of landlords manage just one or two tenancies and larger landlords (owning more than 300 properties) account for only approximately 6% of tenancies. Larger landlords associated with 10 or more tenancies, manage approximately 20% of all private tenancy stock registered.

As highlighted in the Residential Tenancies Board reports, registered private tenancies have been declining nationally since 2016. Private tenancies newly registered with the RTB in Q1 2022 showed a decrease of 32% on the number of registered tenancies in the Q1 2021 Rent Index. Almost 61% of new tenancies registered were for apartments. Both nationally and locally smaller investors are selling off their rental properties. The tax treatment is unfavourable for individual landlords, with most being taxed at the marginal rate, and as a result many landlords have a deficit following the payment of both loan amounts due and tax on rental income.

Other factors influencing the reduction in tenancies through smaller private investors permanently leaving the market are:

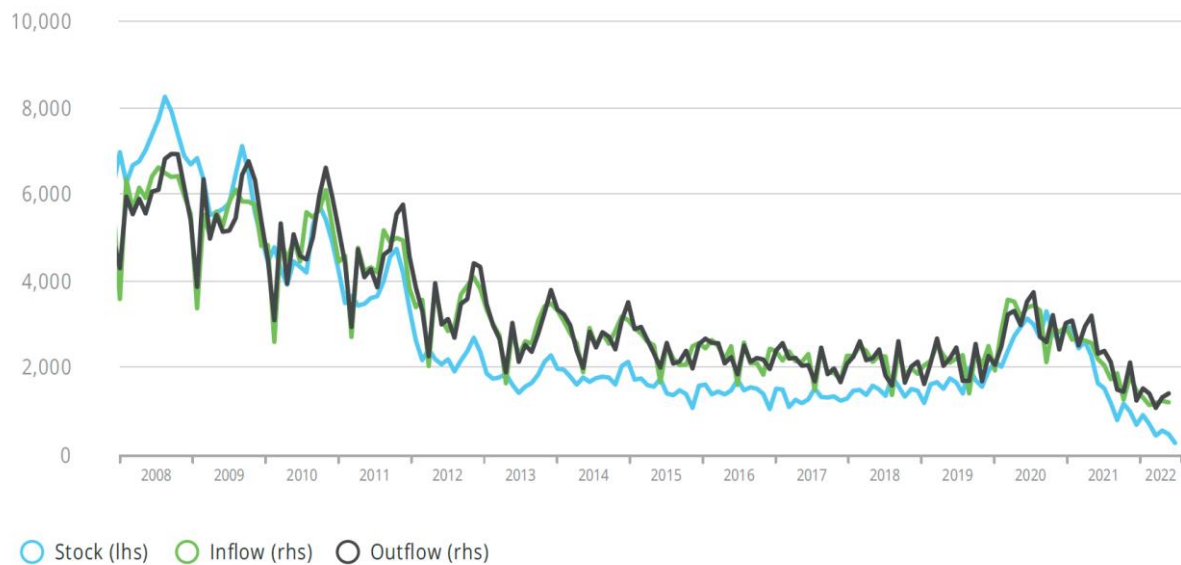
- Increased market price levels now bringing Loan to Value ratios to a point where the likely sales proceeds match or surpass the outstanding mortgages (i.e. negative equity eliminated).
- The cessation by banks of 'interest only' periods on mortgages.
- Difficulties of borrowers in dealing with banks and loan owners.
- Lack of incentives to remain in ownership.
- Overall time-consuming nature of owning properties that are in most cases built over 15 years ago and are now starting to require significant management and expenditure to keep them to a good standard.
- Restrictions of the rental legislations on let properties that were not rented at or near market levels at the time of the introduction of the legislation.
- Limited recourse to assist with addressing problem renters in a timely manner, including non-payment of rent.
- The removal of the 'bedsit' type accommodation as a result of the introduction of minimum standards for housing and Local Authority inspections.
- The age cohort that acquired large of amounts of rental stock in the 1990's and early 2000's is of an older demographic now, and in many cases, they are more likely to sell than invest in properties. These are not being replaced by younger investors as a result of the lack of availability of opportunities and the unfavourable tax treatment of residential rental properties by private landlords.

Hooke & MacDonald forecast that there will be continued exodus of smaller investors from the market in the coming years and these will not be compensated by way of new supply, despite the increases in apartment development. This is a major challenge for the State to overcome.

Unfortunately, the supply side is well below the demand side and rental stock has been depleting across Ireland and specifically in Dublin since 2009. This is illustrated by Figure 2.4.1 below, which is an extract from the Daft.ie Rental Report for Q2, 2022.

Figure 2.4.3 – Dublin Rental Stock Flow Figures – 2008 to Q2, 2022

(Source: Daft Rental Report, Q2, 2022)



According to Daft.ie, there were just 292 homes to rent in Dublin market on 1st August 2022, equating to approximately 20% of the average level of available properties for the same date between 2015 and 2019 and the lowest level of availability in August recorded since the beginning of the Daft.ie dataset in 2006.

Social Housing Supply

A spending review carried out by the Department of Government Expenditure and Reform in October 2020 (and updated in February 2021) titled 'Analysis of Social Housing Build Programme' compiled a review of the types of social housing units delivered between 2016 to 2019 in six Local Authority case study areas (DCC, Fingal, Cork County, Galway City, Kildare and Mayo).

Analysis of the results from the Dublin City Council delivery figures reveal that one-bedroom units accounted for approximately 34%, two-bedroom units accounted for 35%, while 31% had three or more bedrooms.

Local / Emmet Road Area Characteristics

Inchicore, where the Emmet Road site is located is primarily a residential area. It is comprised of mainly 2 storeys early to mid-20th century housing stock, with some medium rise and apartment developments built in more recent decades.

The Emmet Road site and Inchicore are located in Electoral Area, Kilmainham C. It is notable that the number of households in this electoral area increased 13% between 2006 and 2016 and that 90% of this increase was represented by apartments. In recent years a number of new developments have been granted planning permission in this area, some of which are completed or under construction.

The development of the new National Children's Hospital adjacent to the St. James Hospital campus in Rialto, is driving the business case for the development of apartments in the wider locality, which will be able to accommodate "key workers" in the area that they work. This trend is expected to continue over the coming years.

2.5 Demand for Rental Accommodation

Like many urban areas across Ireland, Dublin is experiencing a dire shortage of housing compared to the amount of demand. The narrative around this has been playing out in the media over recent years and it is putting significant pressure on the State to provide solutions, including additional social and affordable accommodation, to the citizens.

The shortage of accommodation appears to be more pronounced in Dublin than most locations, where demographic and economic pressures are pushing demand for rental housing. The Covid-19 pandemic interrupted the demand for rental accommodation from March 2020 through to August 2021, with reduced mobility among the population both domestically and internationally. While vacant accommodation was renting during this period it was taking longer to rent and there was some downward pressure on rents in parts of Dublin.

Since August 2021 there has been a very large increase in demand for rental accommodation across all parts of Dublin. This has resulted in serious issues around supply and affordability.

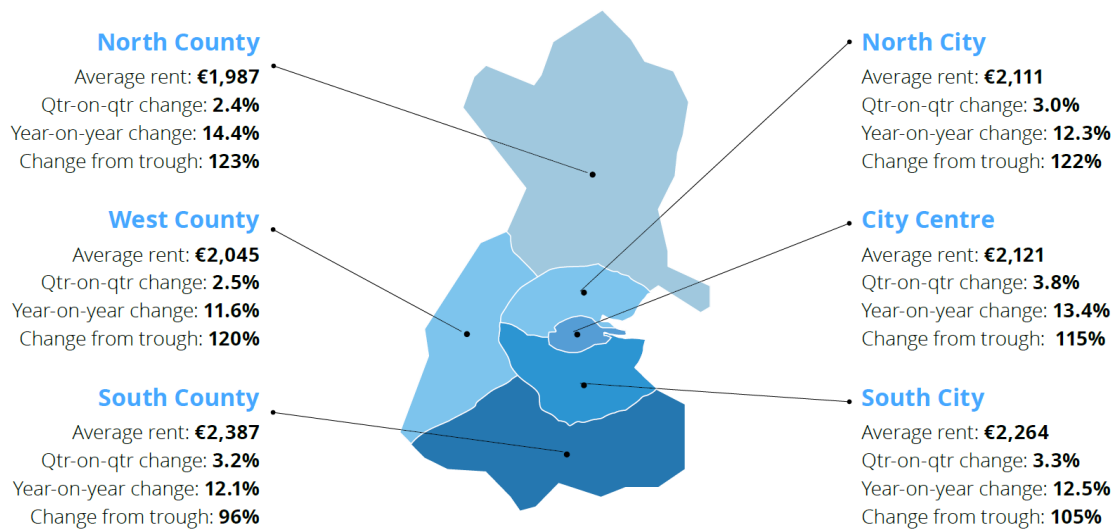
2.6 Current Average Rents

According to research published by the Residential Tenancies Board (RTB Rent Index) in July 2022, rents in new tenancies grew nationally by 9.2% year-on-year, while the number of new tenancy registrations has decreased by 32%, from 15,291 in Q1, 2021 to 10,414 in Q1, 2022.

The national standardised average rent stood at €1,460 in Q1 2022, an increase of €46 compared to the previous quarter. Dublin remained the county with the highest standardised average rent, at €2,015 per month.

Average rents for Dublin are outlined in Figure 2.6.1 below, which is an extract from the Daft.ie Rental Report for Q2, 2022.

*Figure 2.6.1 – Average Rents in Dublin at Q2, 2022 and recent percentage changes
(Source: Daft Rental Report, Q2, 2022)*



2.7 Future / Comparable Potential Developments

The delivery of Cost Rental and Social developments will provide much needed affordable accommodation to a portion of the population. Private rented sector developments will most likely still be the predominant source of supply for rental accommodation for the foreseeable future. Naturally, as a result of the business model, Cost Rental developments should offer accommodation at lower rents to standard private rental sector developments.

We have outlined in a table below a summary of apartment developments over 100 units within 2km of the Emmet Road site that are in the planning system. It is uncertain when and if these projects will be constructed. The Emmet Road development is being designed to all pertinent planning and building standards and will be comparable to properties on the "private market". It is expected that the developments that do proceed would provide a comparable high standard of accommodation to the Emmet Road site. See list of developments and corresponding map below.

*Figure 2.7.1 – Planned residential developments over 100 units within 2km of Emmet Road site
(as at 31st August 2022)*

(Source: Construction Information Systems. Analysis: Hooke & MacDonald)

Property	Planning Stage	Units
White Heather Industrial Estate, South Circular Road, Dublin 8	Plans Submitted	335
Former De La Salle National School, Ballyfermot, Dublin 10	Plans Submitted	927
Guinness Quarter, Dublin 8	Plans Submitted	336
43-50 Dolphin's Barn Street, Dublin 8	Plans Submitted	116
Heuston South Quarter, St. John's Road, Dublin 8	Plans Granted	399
42A Parkgate Street, Dublin 8	Plans Granted	198
Former Bailey Gibson Site, South Circular Road, Dublin 8	Plans Granted	416 *
42A Parkgate Street, Dublin 8	Plans Granted	321
Brickfield House, Brickfield Drive, Dublin 12	Plans Granted	282
Former Heidelberg / Miller Building, Davitt Road, Dublin 12	Plans Granted	188
Former site of Coruba House, St. Agnes Road, Dublin 12	Plans Granted	152
Former Steelworks Site, James Street, Dublin 8	Plans Granted	189
Total		3,859

** A revised planning application was made in August 2022 reducing the number of units to 345. A decision is awaited.*

Our understanding is that none of the above developments had commenced construction as at the date of this report.

Figure 2.7.2 – Planned residential developments over 100 units within 2km of Emmet Road site outlined on the map below (as at 31st August 2022)



3. Emmet Road - Residential Accommodation Review

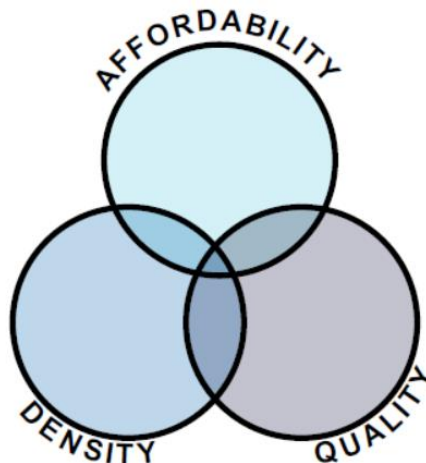
3.1 Introduction

This site is located at the heart of the Strategic Development and Regeneration Area (SDRA) No. 9 St. Michael's Estate (including adjoining Keogh Barracks / Richmond Barracks). It is proposed to be redeveloped as a mixed-use scheme which, as well as being Dublin City Council's first cost rental residential development, will accommodate a range of community uses, including a new crèche and combined community hub & library building.

A development in this location provides the opportunity to deliver a mix of accommodation types with the ability to cater for a wide range of the population. The Emmet Road Development will provide 578 apartments with a tenure mix of c.24% social (137) and c.76% cost rental (441) homes.

Figure 3.1.1 – Development goals for Emmet Road accommodation

(Source: Development Framework Plan for Lands at Emmet Road August 2019)



Hooke & MacDonald currently manage over 3,000 apartments and houses in the Greater Dublin Area. The company has leased up over 2,500 new apartments and houses in newly completed developments over the last 8 years, leasing more new schemes let for the first time than any other organisation in Ireland. This experience, including knowledge of tenant requirements assist in informing our views on the market and advice respect of this development.

Social Housing Demand

Hooke & MacDonald has been provided with details of the number of households on the Dublin City Council Social Housing waiting & transfer lists for July 2022 for Area J, which incorporates the subject site. The lists are broken down by the type of accommodation required and the length of time on the waiting & transfer lists.

The key findings from analysis of these lists are that of the 4,687 households currently on the waiting & transfer lists for one, two and three-bedroom accommodation, approximately 43% (2,029) required one-bedroom accommodation and 40% (1,872) required two-bedroom accommodation, while only 17% (786) required three-bedroom accommodation.

This is broadly in line with social housing accommodation requirements nationally, where figures account for approximately 52% one-bedroom, 34% two-bedroom and 14% three-bedrooms plus, as reflected in the Housing Agency report, 'Summary of Social Housing Assessments 2020'.

3.2 Appropriate Unit Mix for Site

The Emmet Road development proposes the following unit mix:

Apartments Type	Cost Rental Apartments	Social Apartments	Total
Studio	110	-	110
One-Bedroom	111	61	172
Two-Bedroom	195	55	250
Three-Bedroom	25	21	46
Totals	441	137	578

We understand that the average apartments sizes for the Emmet Road site are expected to be as follows:

Figure 3.2.1 – Emmet Road proposed average unit sizes

(Source: Bucholz McEvoy Architects)

• Studio apartments: 41.7 sq.m
• One-bedroom apartments: 51.5 sq.m
• Two-bedroom apartments: 76.1 sqm – 81.2 sq.m
• Three-bedroom apartments: 93.2 sqm – 100.5 sq.m

Commentary on apartment types and unit mix:

Studio Apartments

The relative rental cost of studio apartments allows for accommodation to be provided at a price point that has a very wide market appeal, as explained in more detail in this paragraph. Historically in the Irish market developers concentrated on building standard, one-, two- and three-bedroom apartments and as a result, there are negligible amounts of good quality studio apartments in the Dublin rental or sale market at present. In the current rental market, as a result of rental levels, renters are typically forced to share two- and three-bedroom apartments, rather than being able to afford to rent their own property, under single occupancy. The provision of studio accommodation will allow single tenants to rent a property without having to share. There is a significant segment of the population that would welcome this configuration.

We consider the proposed Emmet Road site studio apartment layout, which will be an average of 41.7 sqm, to be efficient and spacious. We understand that the design target provided by the stakeholders to Bucholz McEvoy Architects is for approximately 20-25% studio apartments across the scheme.

Social Demand

We understand that the Dublin City Council Social Housing waiting & transfer lists have no requirements for studio apartments. Consequently, in our opinion, the allocation for studio apartments should be confined to the Cost Rental element of the development.

Cost Rental Demand

In our opinion, the proposed studio apartment Cost Rental unit mix under the current plans of c.24.9% is suitable for the market and the development. Based on our review and knowledge of the lettings market, we expect that there will be considerable demand for this accommodation type.

One-Bedroom Apartments

Wider population trends show significant requirements for one-bedroom accommodation across the market. In recent years, as planning guidelines have changed, there has been an increased percentage of one-bedroom apartments planned in developments, however, two-bedroom apartments were the predominant accommodation configuration developed over the last 30 years and as a result there is scope for increasing the stock of one-bedroom apartments.

We consider the planned standard one-bedroom apartment layout at Emmet Road, which are to be approximately 51.5 sqm, to be efficient. The removal of the separate hallway provides a better feeling of space. The L-shaped configuration of the kitchen units will also provide a more defined kitchen / dining / living spaces.

We understand that the design target provided by the stakeholders to Bucholz McEvoy Architects is for approximately 25-30% one-bedroom apartments across the scheme.

Social Demand

The Dublin City Council Social Housing waiting & transfer lists points towards requirement for one-bedroom apartments to be approximately 43% of accommodation. Therefore, in our opinion, the proposed one-bedroom apartment Social unit mix under the current plans of c.44.5% is in line with current demand.

Cost Rental Demand

In our opinion, the proposed one-bedroom apartment Cost Rental unit mix under the current plans of c.25.2% is suitable for the market and the development. Based on our review and knowledge of the lettings market, we expect that there will be significant demand for this accommodation type.

Two-Bedroom Apartments

Two-bedroom accommodation is typically suitable for occupants with young families and also for sharers. In the current market as a result of affordability, two-bedroom apartments are very sought after. Consequently, there is wide ranging demand for this apartment type.

The planned two-bedroom apartments at Emmet Road are to be in the region of 76.1 sqm – 81.2 sq.m, which is a generous size and larger than the average apartment size of this type in the Dublin market. We would consider the standard two-bedroom apartment layout to be very efficient.

We understand that the design target provided by the stakeholders to Bucholz McEvoy Architects is for approximately 45-50% two-bedroom apartments across the scheme.

Social Demand

The Dublin City Council Social Housing waiting & transfer lists points towards requirement for two-bedroom apartments to be approximately 40% of accommodation. Therefore, in our opinion, the proposed two-bedroom apartment Social unit mix under the current plans of c.40.1% is in line with current demand.

Cost Rental Demand

In our opinion, the proposed two-bedroom apartment Cost Rental unit mix under the current plans of c.44.2% is suitable for the market and the development. Based on our review and knowledge of the lettings market, we expect that there will be significant and wide-ranging demand for this accommodation type.

Three-Bedroom Apartments

As a result of the extra bedroom, three-bedroom apartments are most suitable for families. They also suit sharers, however, given the household net salary thresholds for Cost Rental accommodation, this may rule out sharers in many instances.

On a rent per square foot basis, they compare unfavourably with smaller apartment configurations, and they typically only form a small percentage of apartment developments, currently and historically in Dublin.

We understand these apartments are planned to be on the ground floor. We consider this to be the most efficient location for the three-bedroom units as they can all have own-door access from a private terrace, reducing the amount of internal circulation space required at ground floor level. The dual aspect accommodation provision will be popular.

We understand the three-bedroom apartments are planned to be a generous 93.2 sqm – 100.5 sqm.

Social Demand

The Dublin City Council Social Housing waiting & transfer lists points towards requirement for three-bedroom apartments to be approximately 17% of accommodation. Therefore, in our opinion, the proposed three-bedroom apartment Social unit mix under the current plans of c.15.3% is in line with current demand.

Cost Rental Demand

In our opinion, the proposed three-bedroom apartment Cost Rental unit mix under the current plans of c.5.7% is suitable for the market and the development. Based on our review and knowledge of the lettings market, we expect that they will be well-received by the market, with demand for this accommodation type primarily from families.

Conclusion in relation to Cost Rental & Social Apartment Unit Mix

Based on our knowledge and review of the market, including demographic factors and the proposed plans, we are confident that the proposed unit mix is appropriate to a new apartment development in this location. We expect there will be strong demand for each of the proposed accommodation types provided.

3.3 Estimated Market Rents

Having analysed comparable rental evidence for the general area, and taking account of the apartment sizes, specification and car and bicycle parking provision, and based on our review and knowledge of the market we are of the opinion that market rental levels for the proposed accommodation would be in the region of the following:

Figure 3.3.1 – Hooke & MacDonald estimated market rents

• Studio Apartments:	€1,500 per month
• One-Bedroom Apartments:	€1,800 per month
• Two-Bedroom Apartments:	€2,150 per month
• Three-Bedroom Apartments:	€2,450 per month

Appendix 2 of this report contains rental market evidence relevant to consideration of the rents for the Emmet Road site.

Cost Rental Target

We understand that the Cost Rental model is targeting a minimum reduction of 25% off Market Rents. This is to be achieved through provision of council lands and reduced rates, efficiencies in design and reductions in ongoing management costs. Applying this discount to the above Hooke & MacDonald estimated market rents equates to the following maximum rents chargeable at Emmet Road:

Figure 3.3.2 – Cost rental rents based on reductions off the Hooke & MacDonald estimated market rents

• Studio Apartments:	€1,125.00 per month	25% Discount off Market Rent
• One-Bedroom Apartments:	€1,350 per month	25% Discount off Market Rent
• Two-Bedroom Apartments:	€1,612.50 per month	25% Discount off Market Rent
• Three-Bedroom Apartments:	€1,837.50 per month	25% Discount off Market Rent

3.4 Affordability and Income

Based on the details we have received from Dublin City Council, we outline below the income thresholds and cost rental affordability analysis:

Figure 3.4.1 – Net Income Thresholds

Social Housing:	Cost Rental Housing:	Private Housing:
<p>Net Household Salary: Up to €35,000 per annum</p>	<p>Net Household Salary: €35,000 - €53,000 per annum</p>	<p>Net Household Salary: No Thresholds</p>

Cost Rental Affordability Analysis

- **Monthly Income** – Cost Rental net income eligibility thresholds are between €35,000 and €53,000 per annum per household. This equates to a net income range of approximately **€2,916 - €4,416 per month**.
- **Rent / Salary Ratio** – For rents to be sustainable and affordable for tenants, the maximum rent proportion is considered to be in the region of 35% of net salary. Applying this ratio to the above net salary range equates to maximum rental range of approximately **€1,021 - €1,546 per month**.
- **Affordability** – Based on the above net income thresholds, rent / salary ratios and estimated market rents, the studio and three-bedroom apartments will require a further discount applied to market rent in order to fall within the maximum rental range of approximately **€1,021 - €1,546 per month** as follows:

Figure 3.4.2 – Maximum Cost Rental Range

• Studio Apartments:	€1,021 per month	32% Discount off Market Rent
• One-Bedroom Apartments:	€1,312.50 per month	25% Discount off Market Rent
• Two-Bedroom Apartments:	€1,537.50 per month	25% Discount off Market Rent
• Three-Bedroom Apartments:	€1,546 per month	37% Discount off Market Rent

4. Emmet Road - Mobility Strategy

4.1 Introduction

As focus and policy both internationally and domestically continues to increase on addressing climate change and implementing sustainable development policies, consideration of how new development mobility strategies support these is becoming increasingly important.

Climate change involves changes to our climate that are caused directly or indirectly by human activities, and which result in greenhouse gases being released into the atmosphere. There are action areas identified in the National Planning Framework (NPF) and Regional Spatial Economic Strategy, and the Dublin City Council Climate Action Plan (2019-2024) has also acknowledged the effects of climate change. The change has already significantly affected Dublin City at a rate that is likely to become more frequent and intense.

As per the Draft Dublin City Development Plan 2022-2028, which was issued in December 2021 and due to be adopted in October 2022, some of the main responses in the plan to the challenges posed by climate change include:

- sustainable settlement patterns (like compact growth – the better use of available land within built up areas close to public transport and the city centre for development opportunities),
- sustainable transport (promoting more walking, cycling and use of public transport).

As per the Draft Dublin City Development Plan, the sustainable and efficient movement of people and goods is crucial for the success and vitality of Dublin city. The plan highlights that we need to move away from private car and fossil-fuel-based mobility to reduce the negative impacts of transport and climate change. The plan seeks to promote ease of movement within and around the city. It also aims to play a key role in:

- safeguarding the environment, and
- adapting to the impacts of climate change.

This policy approach promotes:

- the integration of land use and transportation, and
- improved public transport and active travel infrastructure such as walking and cycling.

The policy also promotes an increased shift towards sustainable modes of travel and an increased focus on the public realm, as well as healthy placemaking. Health placemaking involves shaping the built environment so that healthy activities and experiences are integral to people's everyday lives. For example, measures to locate amenities are within walking distance and neighbourhoods that have more facilities such as parks and green spaces.

The draft plan looks to the future of mobility in the city. This includes increasing the role of:

- shared mobility schemes,
- electric vehicles, and
- other 'micro' mobility options like e-scooters.

4.2 Transport Options

The location of the Emmet Road site and inherent characteristics of the neighbourhood in which it is situated make it an ideal opportunity for the city to fulfil several of the aspirations in relation to addressing climate change and building sustainable developments and communities.

The development of the site, which is only c.5km south-west of the city centre, meets the goal of compact growth within the city, in an area that already has significant social and amenities in place and is within easy reach of multiple employment hubs.

From a transport point of view to the south of the Emmet Road site there is the Red Luas line (Goldenbridge and Drimnagh Luas stations both accessible) and the Grand Canal, which provides a cycleway and walking route directly into the city centre. There are multiple other walking routes also, with Dame Street in Dublin city centre being a 45-minute walk.

To the north, Emmet Road is serviced by a number of Dublin Bus (nos. 13, 40 and 68) and the G Spine / Liffey Valley Bus Connects route will service Emmet Road.

The development of the Emmet Road site integrates land use and transport, and the amenities and transport options of the location will allow future residents in the proposed Emmet Road development to benefit on a daily basis from living in the location. These new residents will also assist in building a sustainable community, bringing custom to the businesses in the area and promoting the establishment of new enterprises.

4.3 Car Parking Strategy

As a result of the location of the development, including its proximity to Dublin city centre and the multiple transport options – Luas, bus, walking and cycling – the Emmet Road site allows for a substantial reduction in the reliance on car-based transport.

We understand it is planned to have 50 car parking spaces provided for the residential accommodation. The proposed car parking for the residential accommodation is highlighted in blue in figure 4.3.1 below.

Figure 4.3.1 – Proposed Car Parking Provision

(Source: Bucholz McEvoy Architects)



It will be important that shared mobility schemes, such as Go Car, are accommodated at the Emmet Road development and we would expect a percentage of the proposed residential car parking spaces to be allocated to shared mobility (at least 10%).

- | | |
|---|---|
|  RESIDENTIAL |  RETAIL |
|  SUPERMARKET |  MOTORCYCLE |
|  COMMUNITY HUB & LIBRARY |  SHARED SURFACE |
|  VILLAGE |  VEHICULAR ROUTE |
|  CEMETERY | |

If possible, we recommend that there required infrastructure to allow for electric vehicle charging is provided to the residential accommodation car parking spaces.

4.4 Bicycle Strategy

In line with national policy and Local Authority development standards, bicycle parking provision is continuing to increase.

There has been a high level of bicycle parking provision planned for the Emmet Road site, as follows:

- 920 resident bicycle parking
- 289 visitor bicycle parking








As a result of the location of the development, we expect good take up of the bicycle parking facilities.

Figure 4.4.1 – Proposed Bicycle Parking Plan

(Source: Bucholz McEvoy Architects)



We recommend that measures are taken in the design to ensure that bicycle storage areas are very secure and there is good provision of CCTV cameras to deter vandals or people who would look to steal the equipment. Experience over recent years has shown that most developments across Dublin require very secure areas for bicycles. This will encourage usage of bicycles and will also assist in ensuring that residents feel comfortable leaving their bicycles in the designated areas, rather than bringing them into their accommodation, which has a tendency to damage common areas and apartments.

-  RESIDENTS BIKE STORAGE
-  VISITORS BIKE STORAGE
-  PRIMARY CYCLE ROUTE
-  CYCLE ROUTE WITHIN SITE
-  ACCESS TO RESIDENT'S BIKE PARKING
-  STAIR CORE
-  COMMUNITY BUILDING & LIBRARY MOBILITY HUB

5. Emmet Road - Childcare / Creche

5.1 Introduction

The Emmet Road SDRA9 aims to provide high quality, mixed-use community facilities as well as employment opportunities. This will incorporate publicly accessible facilities for community including amenities such as library, community centre, crèches as well as employment opportunities.

The proposed childcare facility at Emmet Road is planned to extend to approximately 816 sq.m (8,783 sq.ft) and will include outdoor play zones within the development. This creche amenity will serve the needs of the residents in the development and wider area.

5.2 Design Expectations

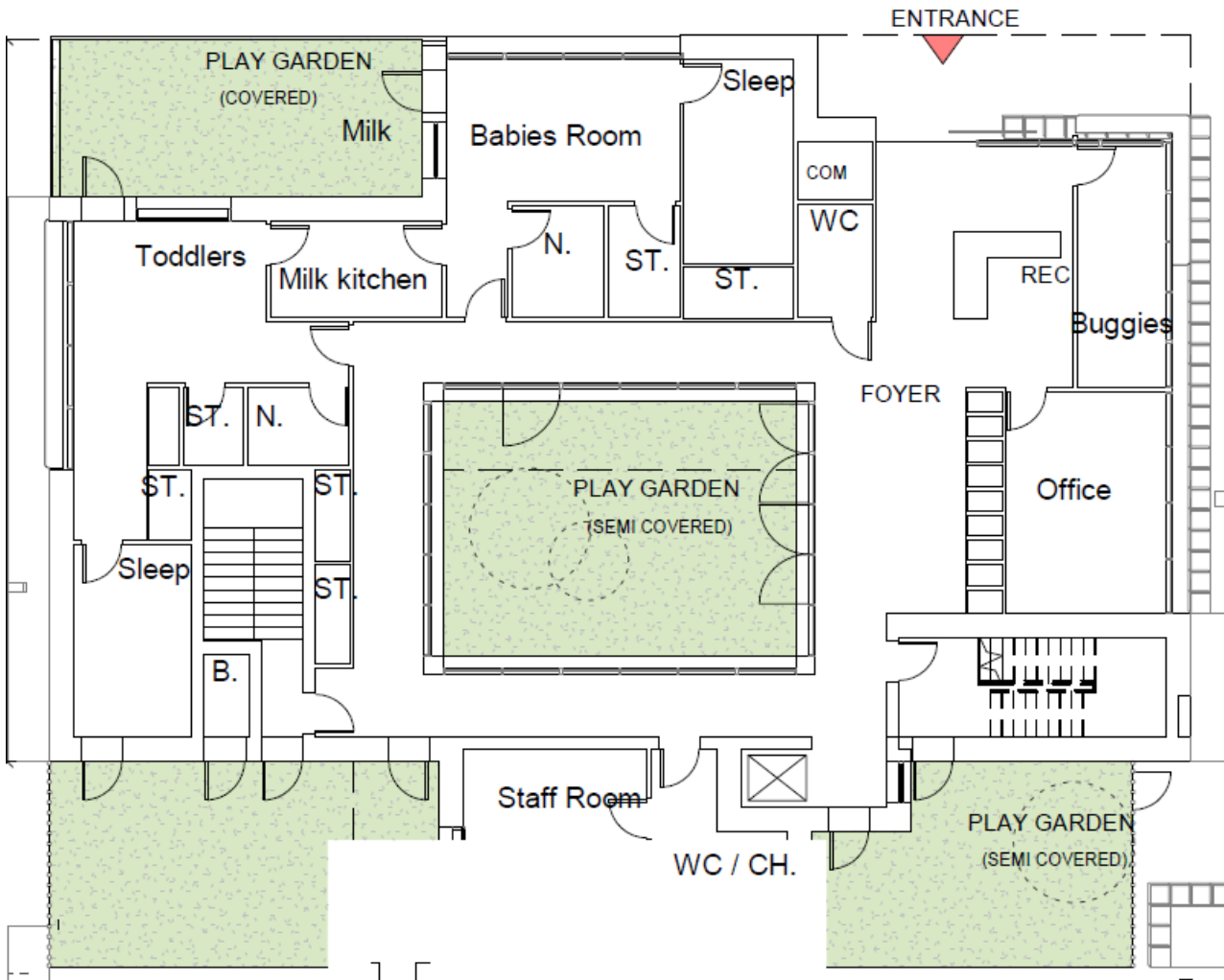
From our experience in the marketing of crèche premises, we would consider the target floor area required by operators of multiple crèche locations would ideally be in the region of approximately 500 – 800 sq.m gross internal area. Single storey crèches may be more efficient as the inclusion of upper floors will require the installation of a passenger lift and also two separate stairwells.

There should be sufficient external play areas accessible directly from the main structure.

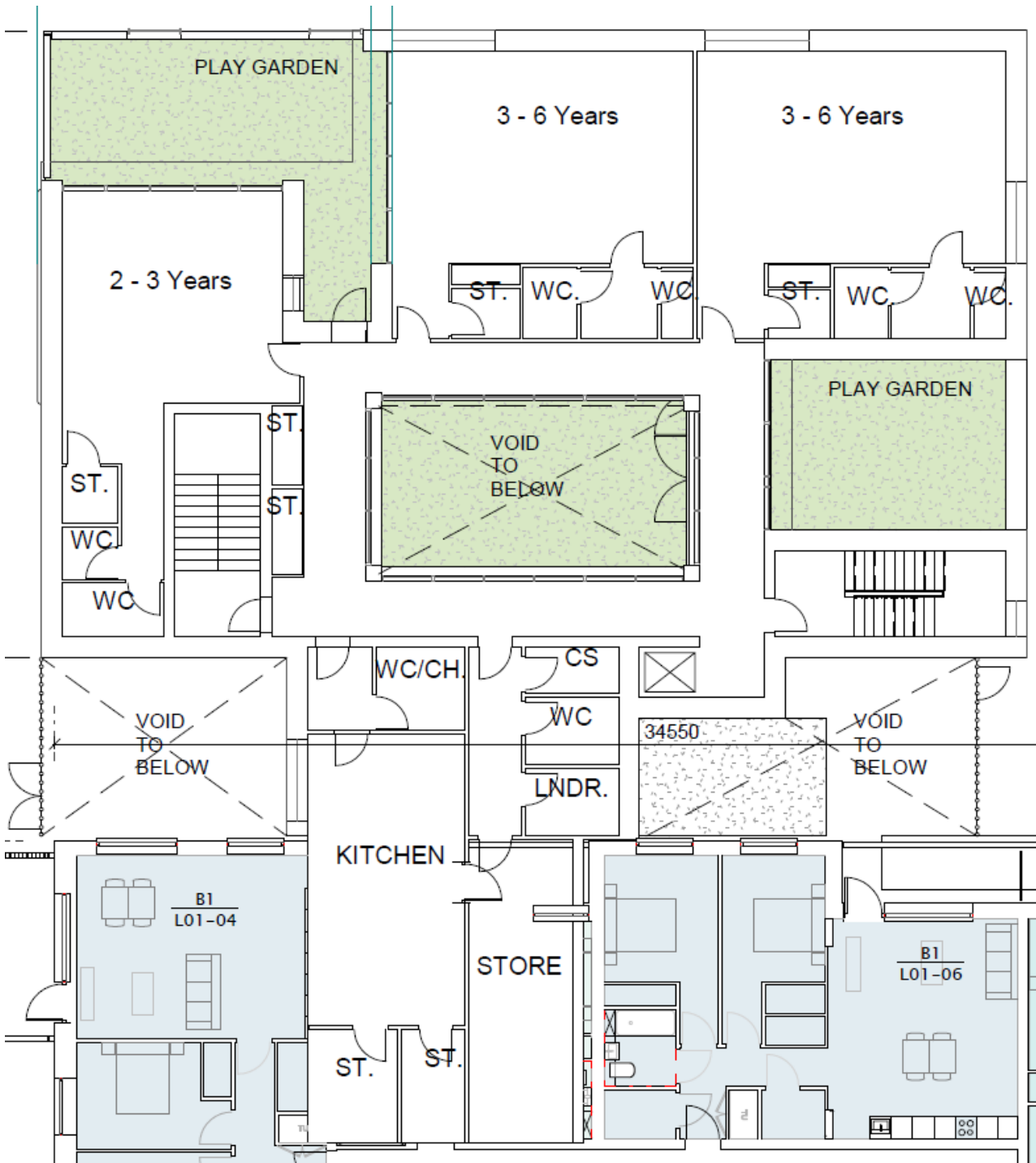
With regards to car parking, a drop-off area with c.5/6 set-down car spaces should be located very close by. Some operators will also require some designated spaces for staff; 1 or 2 should be sufficient for managers/senior staff.

Figure 5.2.1 – Proposed Creche Accommodation Plan

(Source: Bucholz McEvoy Architects)



Ground Floor



First Floor

5.3 Market Expectations

A proposed sale of the crèche premises will only require a shell & core specification with services brought to a single point internally within the structure. External glazing should also be in place. It should be noted that the internal layouts shown above are indicative at this stage and an operator will devise their own layout for agreement with Dublin City Council.

A fully fitted premises would be preferred in the event of a letting. A letting on a fully fitted basis may require further planning consents as the indicative internal layouts may not suit the operator's business plan in terms of number of kids within various age groups.

In terms of timescales, we would expect a sale to conclude a lot quicker as there will be no fit-out required by the vendor, whereas a letting can become quite protracted as internal layouts and specifications are agreed between landlord and tenant.

6. Summary Conclusion

The social and cost rental apartment project being planned for the Emmet Road site is the type of development that Government policy has highlighted as being required i.e. on public land, higher density, sustainable development, aimed at providing affordable accommodation in a well-serviced urban location.

The proposed scheme for the Emmet Road site is a high quality of design which will provide a varied mix of apartment types that will accommodate a wide range of the population in a sustainable living environment.

As outlined herein, there is very strong and broad demand for rental accommodation in Dublin, especially in well-serviced and desirable locations, such as Emmet Road. Increasing rents continue to challenge affordability across the market. The professional approach to management will also be appreciated by the ultimate occupiers. We expect strong demand for the proposed accommodation at the price points outlined.

While rents continue to rise as a result of the market dynamics, including the supply / demand mismatch, one of the main challenges in the current environment is balancing development costs with expected revenues. Many private apartment projects are now being put on hold as a result of the uncertainties in the market, increasing development costs and lack of availability of funding and this is going to result in continued limited supply of apartments across the State in the coming years.

These delivery side factors are likely to be a serious challenge for a project such as Emmet Road, where discounted rents, and consequent reduced revenues, are being proposed. As a result, there is strong likelihood of a requirement for State subvention to ensure a project such as Emmet Road proceeds.

Appendix 1 – Demographic Review

The Emmet Road site is located in Kilmainham C electoral area. As part of the research for this report we analysed the Census 2016 results for the area surrounding the subject site (Study Area) and compared these with results from the wider Dublin City Council (DCC) area. The Study Area is composed of the following seven Electoral Districts: Kilmainham C, Inchicore A, Inchicore B, Crumlin A, Crumlin B, Ushers A and Ushers F. The headline CSO results are as follows:

Population Change between 2011 to 2016

The 2011 Census shows a total population of 21,586 in the Study Area, while the 2016 Census shows an increase in population of approximately 10.7% to 23,892 persons. In comparison to the wider DCC area, the 2011 Census shows a total population of 466,990, while the 2016 Census shows an increase in population of approximately 18.8% to 554,554.

Population by Age

Results in the Study Area show a slightly higher proportion of the population between the ages of 25-44 with 40.2% accounting for this age bracket, compared with 37.4% in the DCC area. There is a slightly lower proportion of the population in the 0-24 age bracket in the Study area at 25.9%, compared with DCC area average at 28.2%.

Type of Occupancy

Approximately 46.4% of occupiers in the Study Area rent from a private landlord, local authority or voluntary body, which is slightly higher than the DCC average of 43%.

Type of Accommodation

There is a c. 3% difference of houses and apartments for the study area versus the City Council area. In the DCC area approximately 63.1% of households are houses and approximately 34.3% are apartments, while approximately 60.2% of households in the Study Area are houses and approximately 37.6% are apartments.

Household Sizes

Results in the Study Area show a slightly higher number of smaller household sizes compared with the DCC area averages. In the Study Area approximately 28.8% account for one-person households, 33.9% are two-person, 18% are three-person and 19.3% are four or more people. In the DCC area approximately 28.3% account for one-person households, 32% are two-person, 17.1% are three-person and 22.6% are four or more people.

Household Types

Results in the Study Area are in line with the DCC area averages for Household Types, where singles, married couples and cohabiting couples account for approximately 47% of households (approximately 46.6% in DCC area).

Households by Year Built

The largest divergence in CSO household results between the Study Area and the DCC area occur in this category. Just over 40% of the DCC area's housing stock was built prior to 1960, while the Study Area has a higher proportion of older housing stock with just over 50% built prior to 1960. While the DCC area witnessed steady development between 1960 to 2000, with 32.2% of all households built in this period, the Study Area witnessed only half of this development, with only 16% of its housing stock built in the same period. Perhaps as an indication of much-needed regeneration, the Study Area has a slightly higher proportion of housing built in the last 20 years than the DCC area average, accounting for 18.3% compared with 14.5% in DCC.

Appendix 2 – Rental Market Transactional Evidence

Studio Apartments			
Property Address	Description	Status	Rent PCM
Flat 7, 39 Synge Street, Dublin 8	Studio, Furnished, No Parking	Let Agreed August 22	€1,317
Bloomfield Avenue, Portobello, Dublin 8	Studio, Furnished, No Parking	Let Agreed August 22	€1,495
Rialto Cottages, Rialto, Dublin 8	Studio, Furnished, Parking	Let Agreed August 22	€1,500
Rialto Court, Rialto, Dublin 8	Studio, Furnished, No Parking	Let Agreed September 22	€1,350
Apt 25, 20 Christchurch Place, D08 DY92, Dublin 8	Studio, Furnished, No Parking	Let Agreed September 22	€1,483
New Row Place, New Row South, Dublin 8	Studio, Furnished, No Parking	Let Agreed September 22	€1,565
Apartment 195, Block K, The Tramyard, Dublin 8	Studio, Furnished, Parking	Let Agreed September 22	€1,521
Seven Oaks, Sarsfield Road, Inchicore, Dublin 8	Studio, Furnished, Parking	Let Agreed September 22	€1,560
Apartment D, Whitehall House, Dublin 8	Studio, Furnished, No Parking	Let Agreed September 22	€1,248
Flat 4, 7 Grove Park, Rathmines, Dublin 6	Studio, Furnished, No Parking	Let Agreed September 22	€1,052
Flat 3, 20 Grove Park, Rathmines, Dublin 6	Studio, Furnished, No Parking	Let Agreed September 22	€1,223

One Bedroom Apartments			
Property Address	Description	Status	Rent PCM
Apartment 17, Block F, Mellows Quay, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,800
Flat 2, 161 James's Street, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,800
Apt 13, Deans Court, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed August 22	€1,715
Apartment 15, Portobello Dock, Portobello, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed August 22	€1,800
Apartment 12, Chesterfield, Riverpark Apartments, Islandbridge, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed August 22	€1,719
Flat 8, 91 South Circular Road, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,800
South Circular Road, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,805
Rialto Court, Rialto, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed August 22	€1,800
Apartment 3, 91 South Circular Road, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,900
Apartment 21, Newmarket Square, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed August 22	€1,800
Apartment 8, 35 Synge Street, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,750
11 Lennox Street, Portobello, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed August 22	€1,650
Apartment 175, Block D, Bellevue, Islandbridge, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed August 22	€1,750
La Touche Hall, 38/39 Aungier Street, Dublin 2	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,700
Suite 2, 308 Kimmage Road Lower, Terenure, Dublin 6	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,737
89 Terenure Road North, Terenure, Dublin 6	1 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€1,850
Apt 12, Block C, Bellevue, D08 P3V9, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed September 22	€1,712
Apartment 15, Portobello Dock, Portobello, Dublin 8	1 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed September 22	€1,800

Two Bedroom Apartments			
Property Address	Description	Status	Rent PCM
74 Rothe Abbey, South Circular Road, Kilmainham, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment With Parking	Let Agreed August 22	€2,100
Apartment 2, Alley Haven, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€2,200
Apartment 7, Ardee Court, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€2,200
Apartment 22, Saint Kevins, Bloomfield Avenue, Portobello, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€2,175
92 Bridge Water Quay, Islandbridge, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment With Parking	Let Agreed August 22	€2,000
Leinster Road, Rathmines, Dublin 6	2 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€2,044
4, 30 Saint James' Walk, Dublin 8	2 Bedroom, 2 Bathroom, Furnished Apartment, No Parking	Let Agreed September 22	€2,015
Rialto Street, Rialto, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment With Parking	Let Agreed September 22	€2,250
Apartment 2, Alley Haven, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment, No Parking	Let Agreed September 22	€2,200
Apartment 7, Ardee Court, Dublin 8	2 Bedroom, 1 Bathroom, Furnished Apartment With Parking	Let Agreed September 22	€2,200

Three Bedroom Apartments			
Property Address	Description	Status	Rent PCM
Flat 1, 161 James's Street, Dublin 8	3 Bedroom, 2 Bathroom, Furnished Apartment, No Parking	Let Agreed August 22	€2,500
Long Meadows, Conyngham Road, Islandbridge, Dublin 8	3 Bedroom, 1 Bathroom, Furnished Apartment, With Parking	Let Agreed September 22	€2,500

General Caveat

In accordance with our standard practice we state that our thoughts regarding the likely ERVs of the proposed accommodation, which are provided for discussion purposes only at this time, are based; on details provided; current market conditions; current Irish legislation; the proposed accommodation being completed to a high standard of design / finish and; on the assumption that show units will be completed prior to the start of any marketing campaign. It should be noted that the likely sale prices of the residential accommodation are provided inclusive of VAT.

The residential likely ERVs provided relate to private residential accommodation only and do not provide for the inclusion of social housing as required under the relevant legislation.

This advice is provided in the course of providing estate agency services and is not intended for loan security purposes. Consequently in accordance with PS1, paragraph 5.4, of the RICS Valuation Global Standards, we have not been required to provide a formal Valuation Report for the intended purpose of this letter as stated herein. In the event that we are required to undertake a formal Valuation Report, we reserve the right to alter the stated figures herein.

The outbreak of the Novel Coronavirus (COVID-19), declared by the World Health Organisation as a "Global Pandemic" on 11th March 2020, has impacted global financial markets. Travel restrictions remain in many countries. Market activity is being impacted in many sectors. As at the date of this report Hooke & MacDonald consider that we can attach less weight to previous market evidence for comparison purposes, to inform opinions of rents, yields and likely sales prices. Indeed, the current response to COVID-19 means that we are faced with an unprecedented set of circumstances on which to base a judgement. Consequently, less certainty – and a higher degree of caution – should be attached to our estimated indicative pricing than would normally be the case. Given the unknown future impact that COVID-19 might have on the real estate market, we recommend that you keep the estimated pricing of this property under frequent review.

Finally, in accordance with our standard practice we must state that the likely sale prices stated herein are provided merely as an informal estimation for the sole use of the party to whom it is addressed. In accordance with our standard practice we state that our current estimation of likely sale prices provide no guarantee of future likely sale price which may increase or decrease