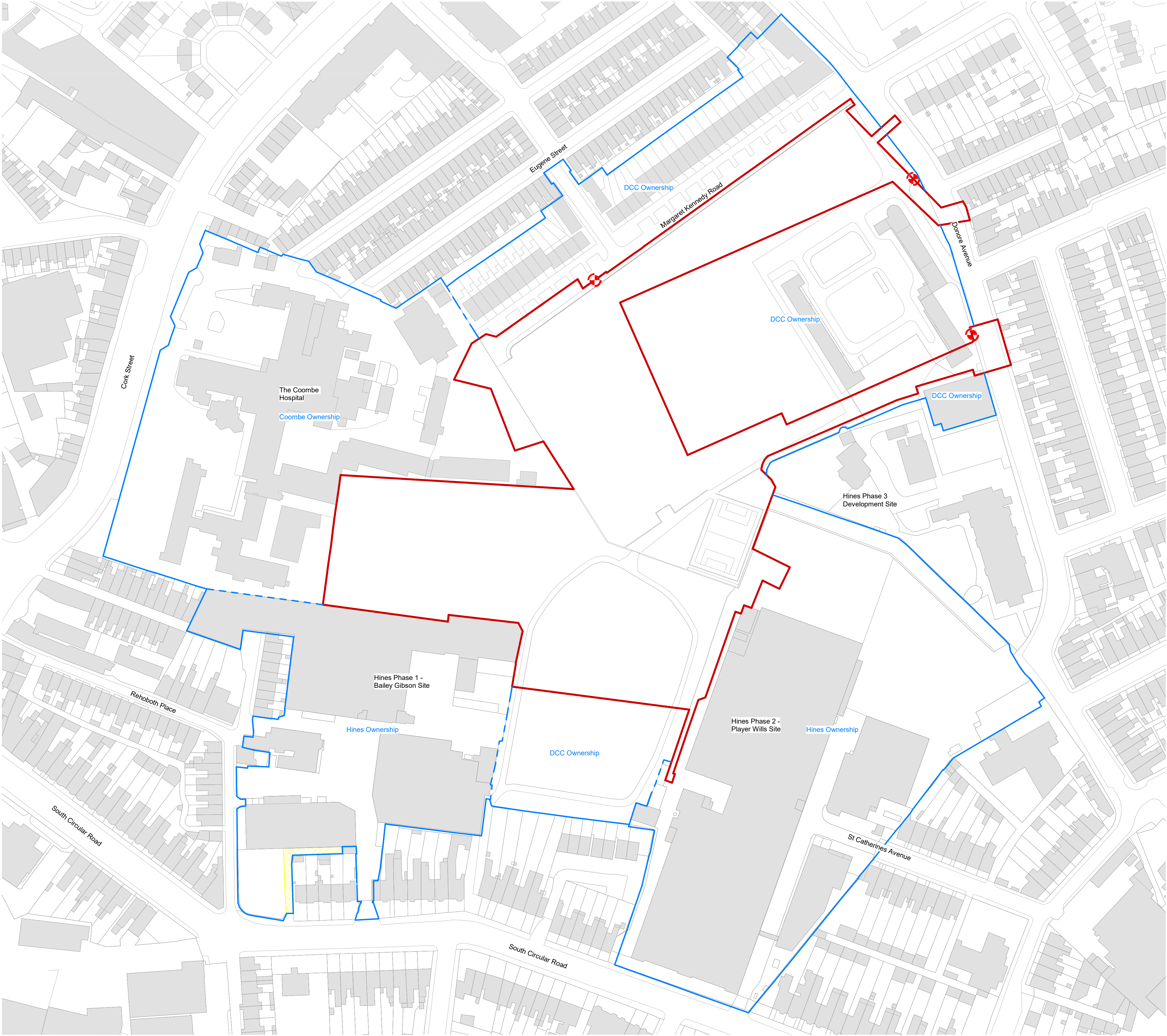
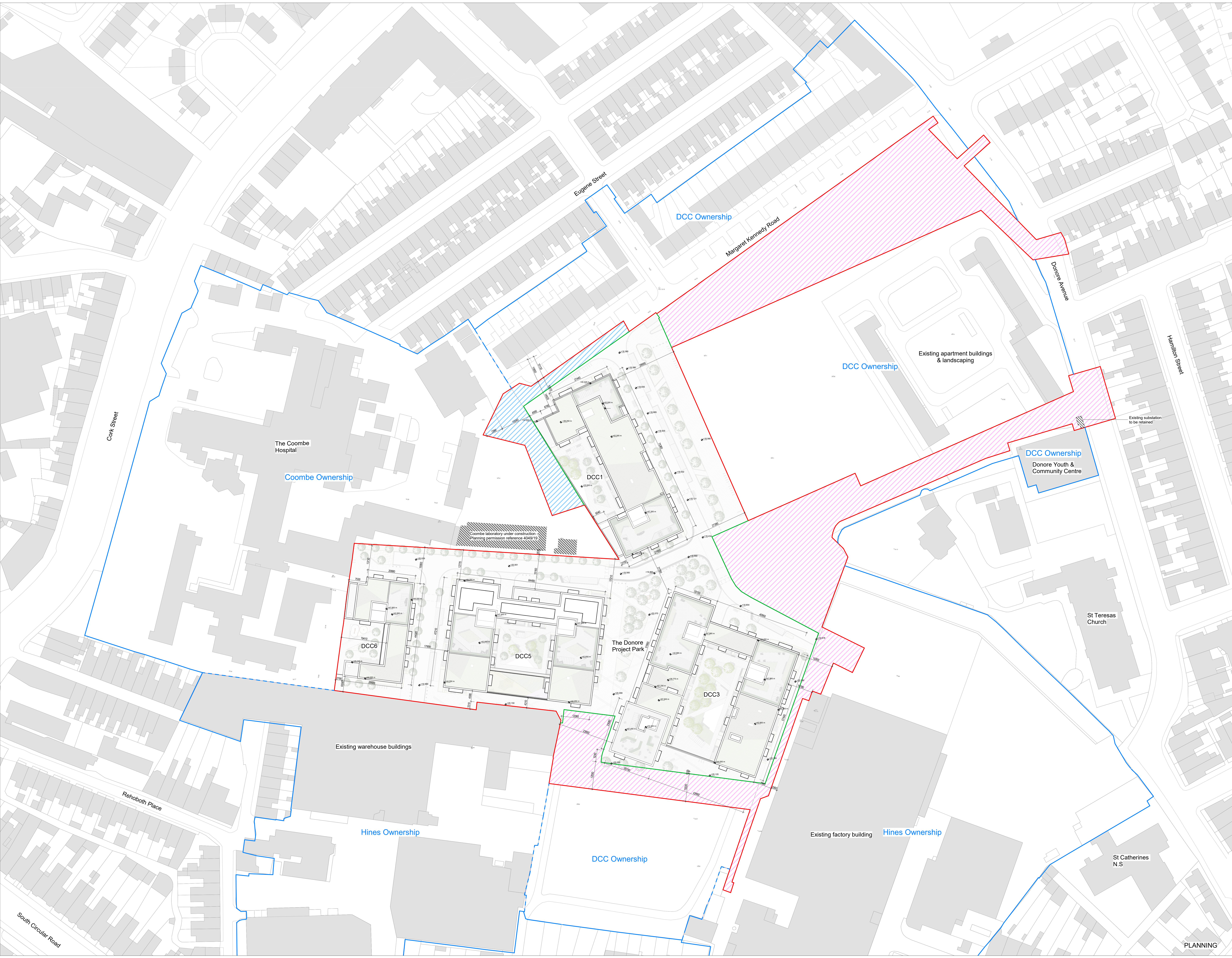


## Appendix A



- Site boundary
- Adjacent lands, the ownership of which is noted on the drawing
- Adjacent lands, ownership separation line
- Wayleave
- Location of site notice





- Site boundary
- Net developable area boundary
- Adjacent lands, the ownership of which is noted on the drawing
- Adjacent lands, ownership separation line
- Areas required for temporary construction access, underground infrastructure and site compounds (refer to Construction Management Plan and Civil/ME Engineers Drawings). Temporary landscape finishes to be installed upon completion.
- Area required for temporary construction access and underground infrastructure (refer to Construction Management Plan and Civil/ME Engineers Drawings). Finishes to be reinstated upon completion.

Revision	Date	Description	Issued	Checked
P1	Dec '22	Issued for Planning	CC	JB

Notes  
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Land Development Agency



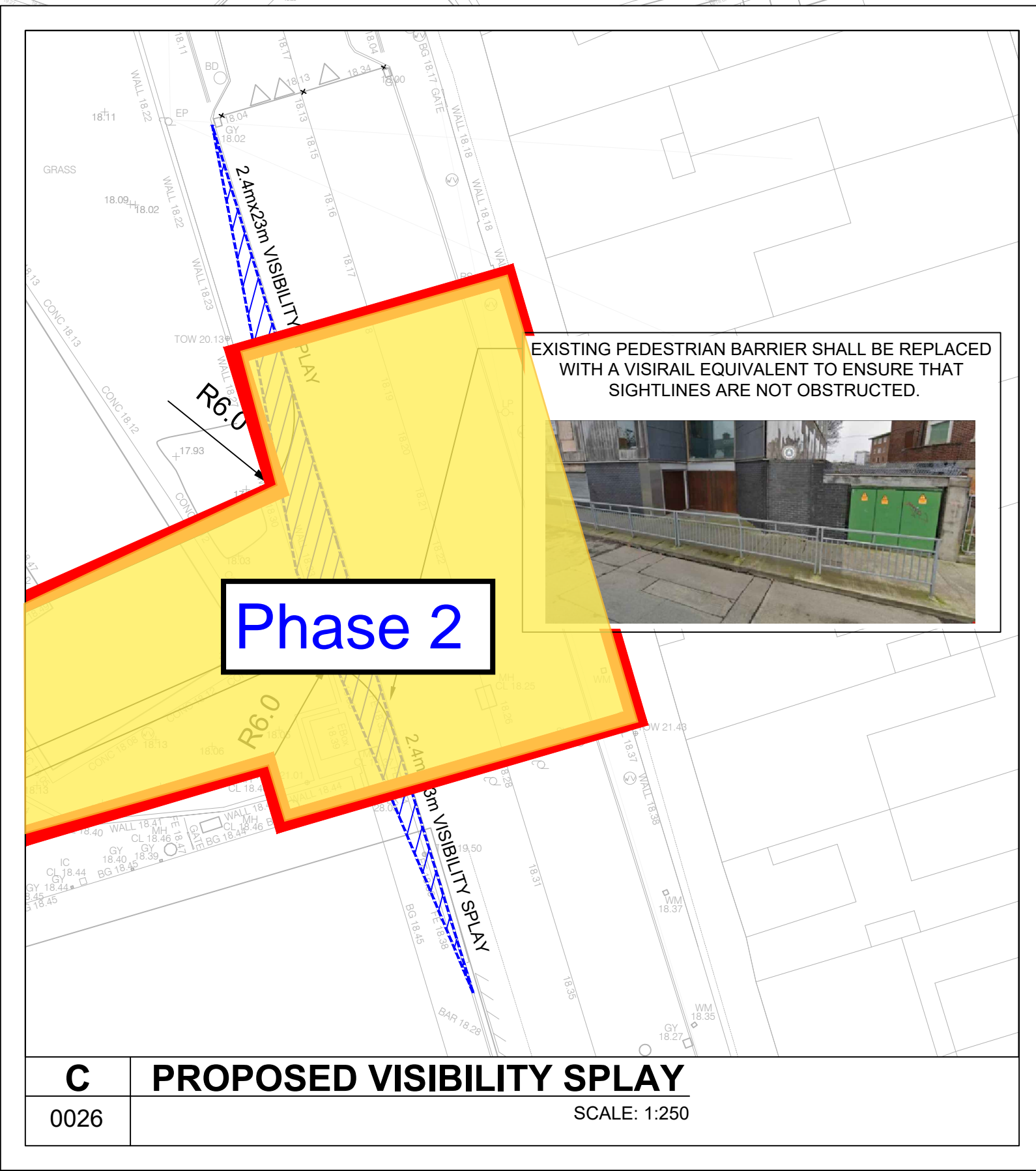
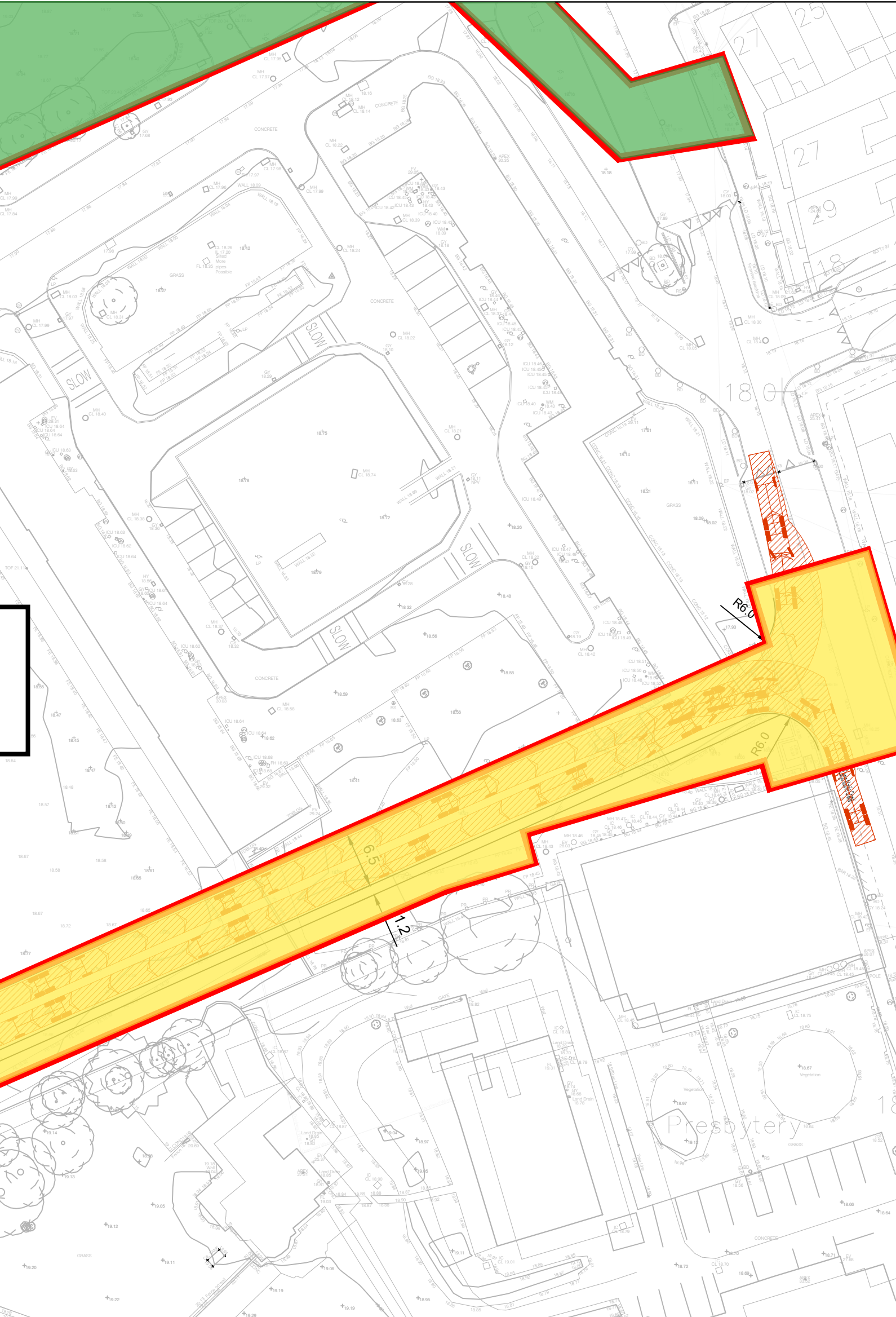
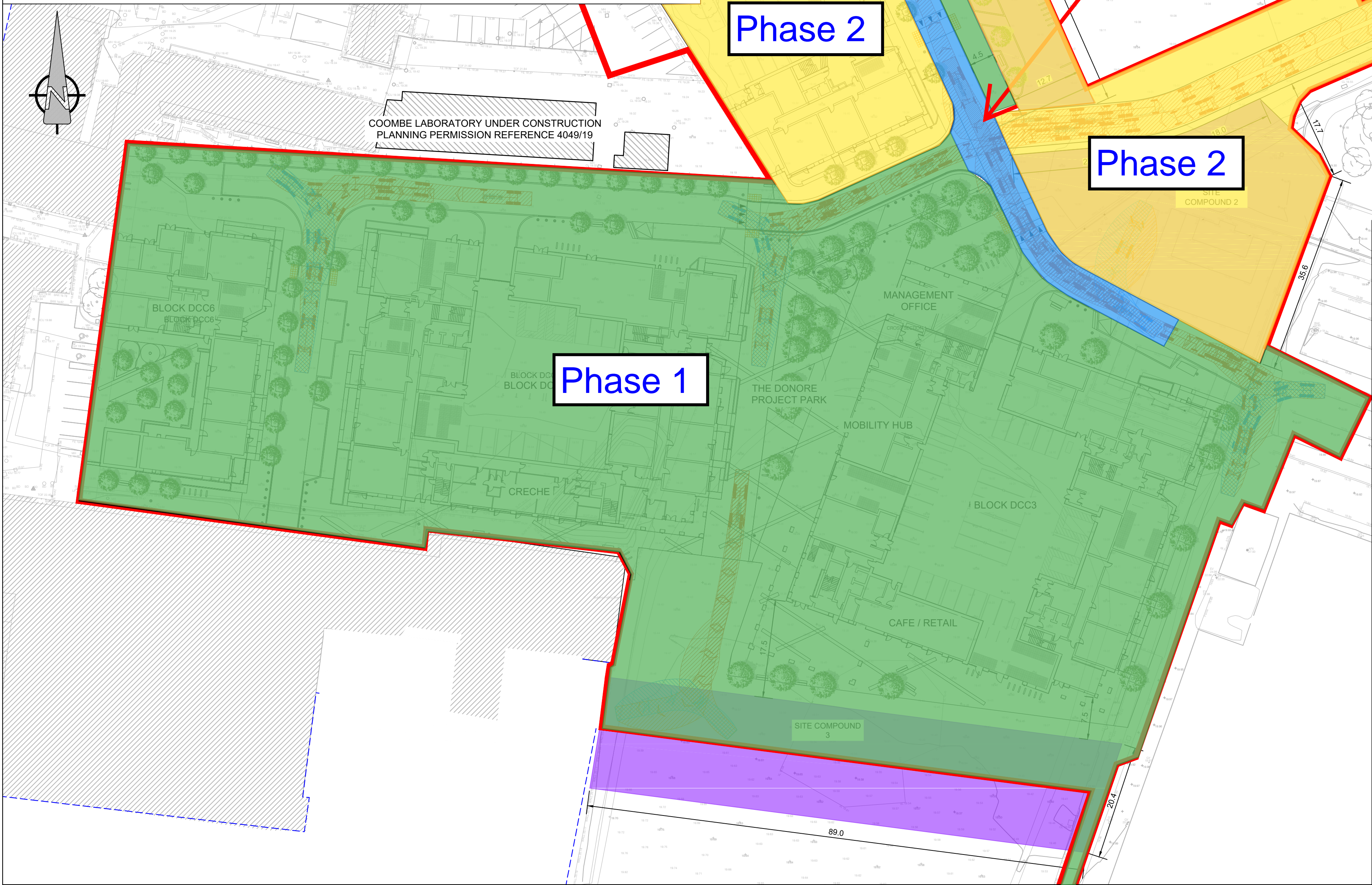
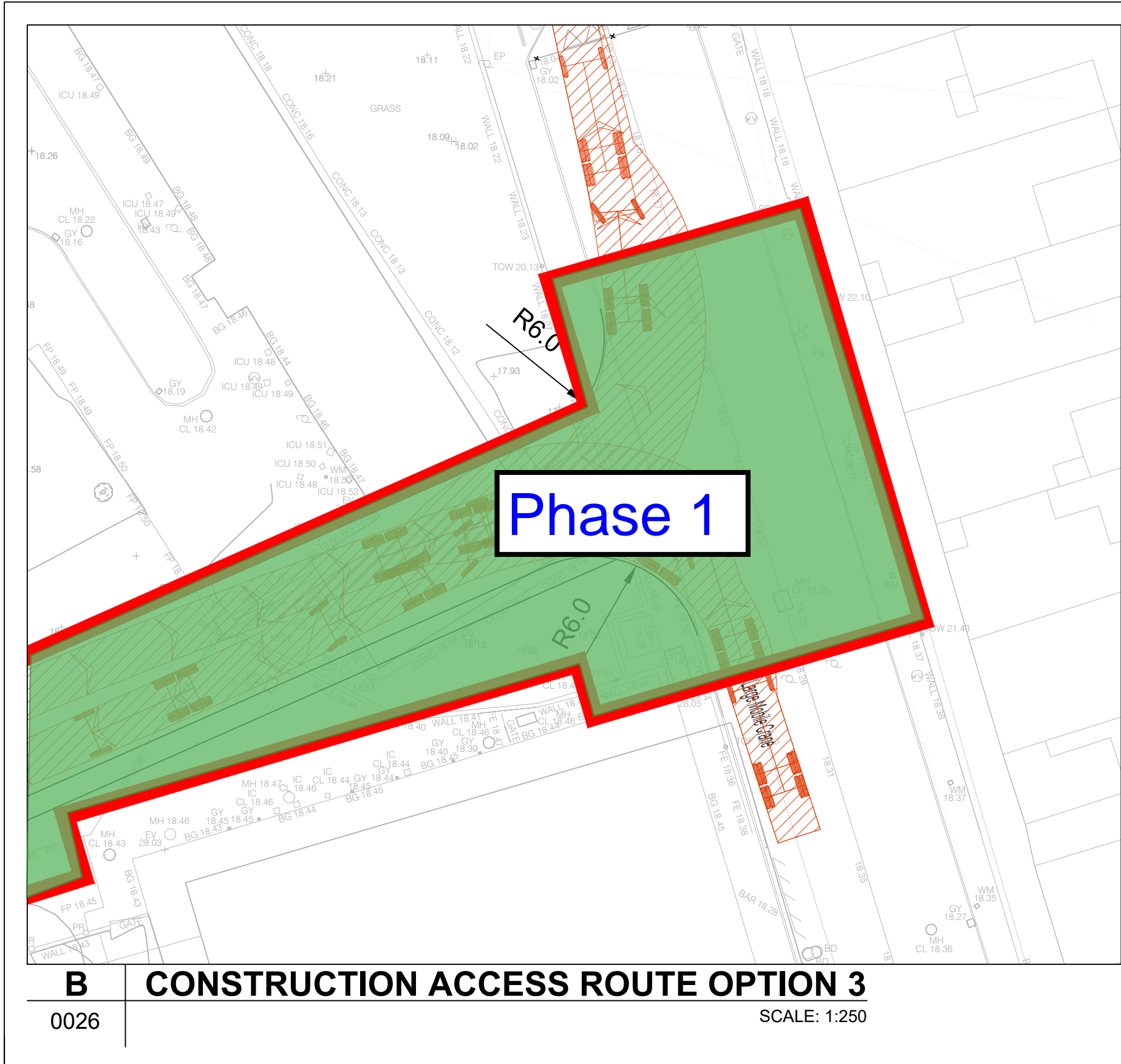
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Project:	Donore Project, Donore Avenue
Client:	The Land Development Agency
Location:	Dublin 8
Title:	Site Layout Plan, Proposed
Date:	Dec '22
Scale:	1 : 500 @ A0
Drawing Number:	STG-MW-S1b-00-XX-DR-A-1100002-54-P1

PLANNING



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Checked: DM  
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# AECOM

**PROJECT**  
DONORE PROJECT, DONORE AVENUE, DUBLIN 8

**CLIENT**  
THE LAND DEVELOPMENT AGENCY (LDA)

**CONSULTANT**  
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- FOR DRAINAGE LAYOUT REFER TO DRAWING STG-AEC-S1b-00-00-DR-C-0000901.

**SWEEP PATH ANALYSIS**

SWEEP PATH FORWARDS MOVEMENT  
SWEEP PATH BACKWARDS MOVEMENT

**Large Mobile Crane**

Overall Length	12.30m
Overall Width	2.43m
Overall Body Height	3.38m
Min Body Ground Clearance	0.59m
Track Width	2.43m
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	10.000m

**AECOM SKETCH**

**ISSUE/REVISION**

NO	DATE	DESCRIPTION
C	20.07.2022	ISSUED FOR INFORMATION
B	16.05.2022	ISSUED FOR INFORMATION
A	19.04.2022	ISSUED FOR INFORMATION
I/R	DATE	DESCRIPTION

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60648061

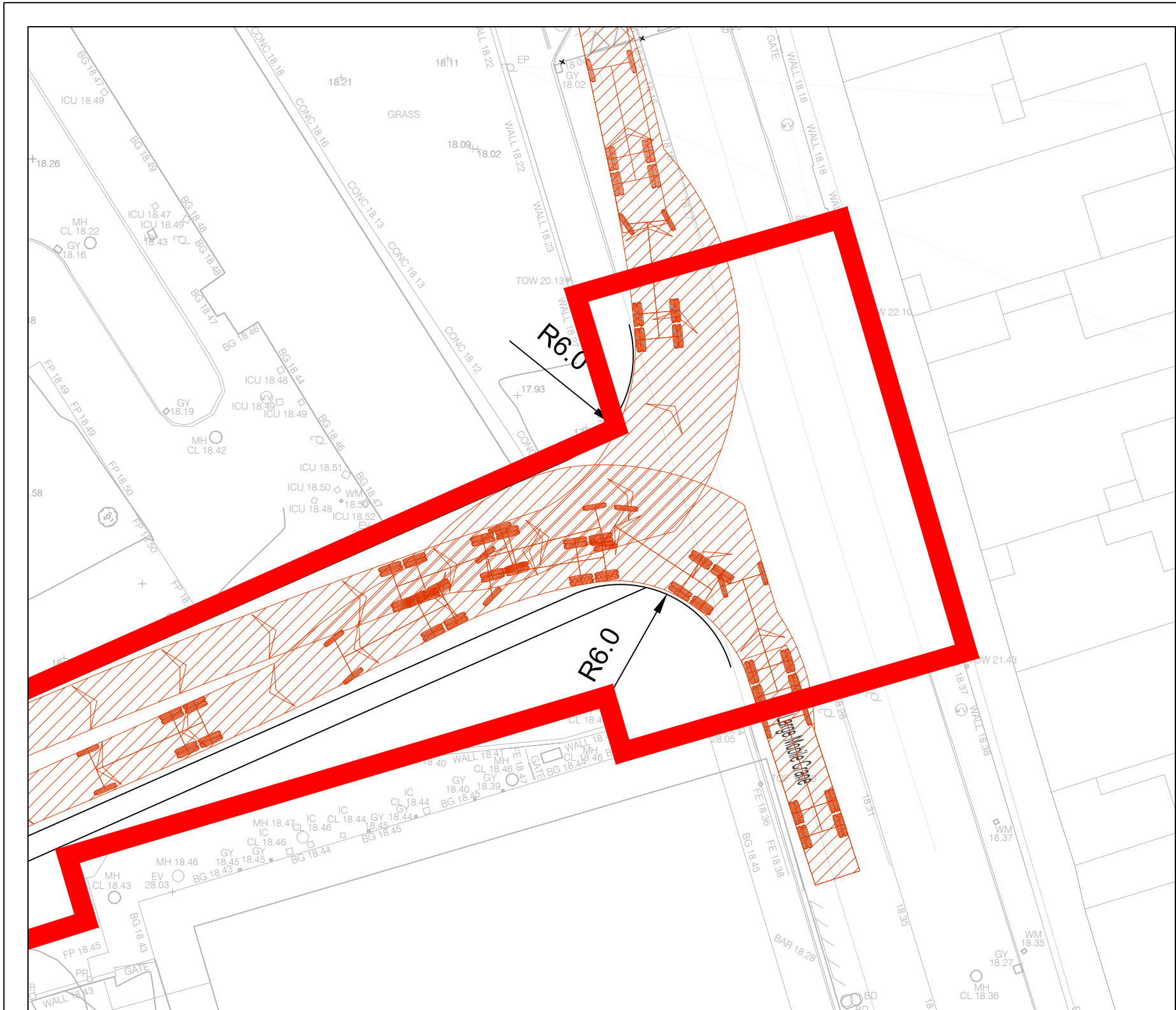
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CONSTRUCTION ACCESS ROUTE OPTION 3

**SHEET NUMBER**  
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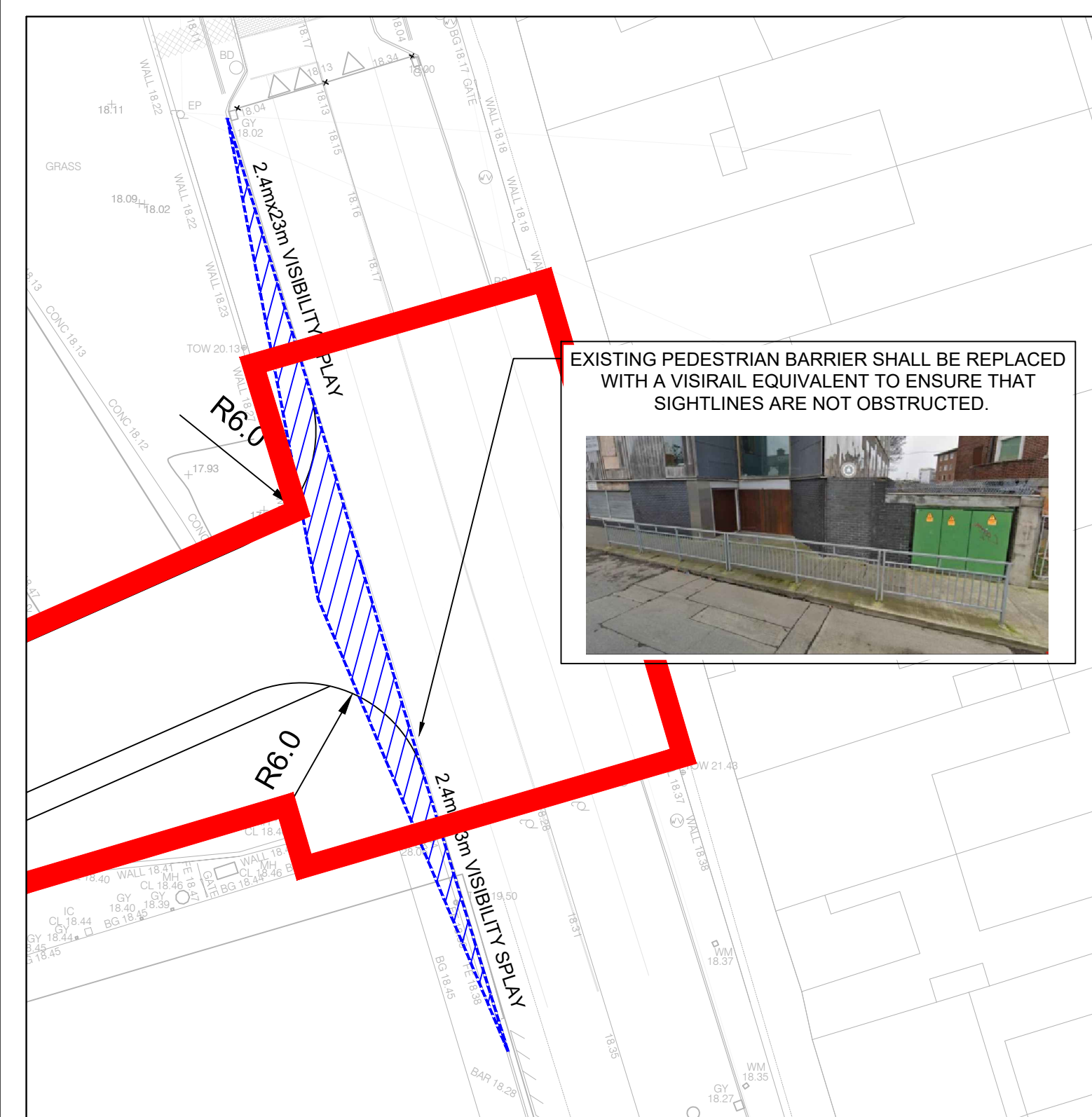
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**B CONSTRUCTION ACCESS ROUTE 3**  
0026 SCALE: 1:250



**A CONSTRUCTION ACCESS ROUTE 3**  
0026 SCALE: 1:500



**C PROPOSED VISIBILITY SPLAY**  
0026 SCALE: 1:250

**AECOM**

**PROJECT**

DONORE PROJECT, DONORE AVENUE, DUBLIN 8

**CLIENT**

THE LAND DEVELOPMENT AGENCY (LDA)

**CONSULTANT**

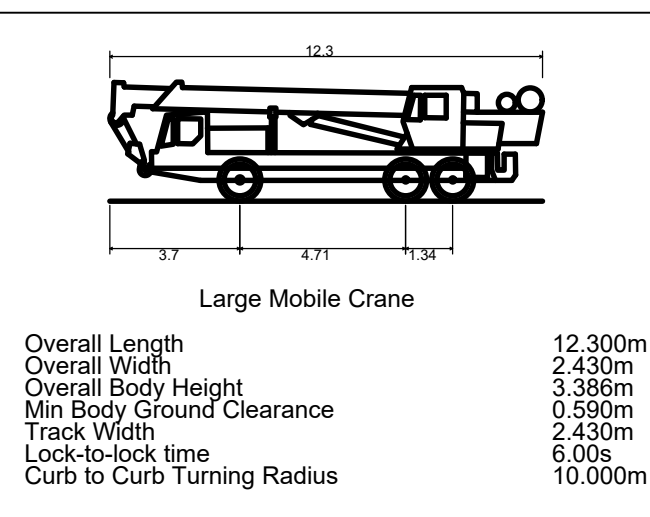
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**SWEEP PATH ANALYSIS**

- SWEEP PATH FORWARDS MOVEMENT  
SWEEP PATH BACKWARDS MOVEMENT



**AECOM**  
**SKETCH**

**ISSUE/REVISION**

E	16.09.2022	ISSUED FOR INFORMATION
D	04.08.2022	ISSUED FOR INFORMATION
C	20.07.2022	ISSUED FOR INFORMATION
B	16.05.2022	ISSUED FOR INFORMATION
A	19.04.2022	ISSUED FOR INFORMATION
I/R	DATE	DESCRIPTION

**PROJECT NUMBER**

60648061

**SHEET TITLE**

CONSTRUCTION ACCESS ROUTE 3

**SHEET NUMBER**

STG-AEC-XX-00-SK-C-00-0026

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## Appendix A



## Appendix B



# **Planning Report**

*In respect of*

## **Section 175 Application for Approval of Proposed Residential Development**

*at*

**Site of Former St. Teresa's Gardens, Donore  
Avenue, Dublin 8**

*Prepared by*

**John Spain Associates**

*On behalf of the Applicant*

**The Land Development Agency**

**December 2022**



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Dublin 2  
D02 ND61

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**Appendix 1: Assessment against 2016-2022 Dublin City Development Plan**

**Appendix 2: Correspondence from IAA**

**Appendix 3: DCC Letter in regard to Confirmation of Demolition**

**Appendix 4: DCC Letter in regard to Community Facilities**



**DOCUMENT CONTROL SHEET**

<b>Client:</b>	<b>The Land Development Agency</b>
<b>Project Title and Job No.:</b>	<b>Donore Project 21154</b>
<b>Document Title:</b>	<b>Planning Report</b>
<b>Document No:</b>	<b>Final 1</b>

<b>Rev.</b>	<b>Status</b>	<b>Author(s)</b>	<b>Reviewed By</b>	<b>Approved By</b>	<b>Issue Date</b>
<b>01</b>	<b>Draft</b>	<b>DF</b>	<b>SB</b>	<b>SB</b>	<b>18/11/2022</b>
<b>02</b>	<b>Final</b>	<b>DF</b>	<b>SB/JS</b>	<b>JS/SB</b>	<b>06/12/2022</b>



## 1.0 INTRODUCTION

- 1.1 This report has been prepared by John Spain Associates to set out the planning and development context for the proposed residential development at St. Teresa's Gardens, Donore Avenue, Dublin 8.
- 1.2 This application for approval is made by The Land Development Agency (LDA) under Section 175 of the Planning and Development Act 2000, as amended, on behalf of Dublin City Council. Provisions for developments by a Local Authority are provided for under Section 175 where an EIAR is prepared. Applications can be made under Section 175 by the Local Authority or by others on behalf of, or jointly, or in partnership with the Local Authority for approval by the Board. This application is being made by the LDA on behalf of Dublin City Council, and a letter confirming the City Council's approval to same is enclosed with this application.
- 1.3 The application site forms part of the former St. Teresa's Gardens social housing complex, of which two of the original blocks remain on site (a Part 8 permission exists for their demolition). The lands, extending to 3.26 ha, are primarily in the ownership of Dublin City Council. Letters of consent obtained from adjacent landowners whose lands are included within the red line have been enclosed with the application (see appendix of the Application Form prepared by JSA.)
- 1.4 The proposal relates to a 7 year permission for the demolition of the existing boundary wall on Margaret Kennedy Road, existing five-a-side playing pitch, and associated fencing and lighting on site; and the construction of a residential development set out in 4 no. blocks (Blocks DCC1, DCC3, DCC5 & DCC6) ranging from 2 no. to 15 no. storeys above ground level, providing 543 no. social and cost rental apartments: 225 no. 1 bedroom apartments (36 no. 1 person, 189 no. 2 person), 52 no. 2-bed (3 person) apartments, 222 no. 2-bed (4 person) apartments, and 44 no. 3 bedroom apartments. The proposal will also provide for a retail/café unit (168 sq.m.), mobility hub (52 sq.m.) and 952 sq.m. of community, artist workspace, arts and cultural space, including a creche, set out in 4 No. blocks.
- 1.5 The site currently represents an underutilisation of land in a central highly accessible location with an excellent opportunity to provide a high-quality development with a significant quantum of residential use. Under the new Dublin City Development Plan 2022-2028 the lands remain zoned Z14 which has the stated objective: *'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.'*
- 1.6 This Section 175 application for approval seeks to deliver a comprehensive redevelopment of this substantial site on Donore Avenue located within the St Teresa's Gardens and Environs Strategic Development & Regeneration Area (SDRA 11). The proposal seeks to deliver an appropriate density of residential development, wider public realm improvements, in accordance with national and local planning policy objectives which seek to deliver compact growth in accessible locations within existing built-up areas through greater building height and intensity of land use.
- 1.7 This planning report demonstrates that the proposed development is consistent with the relevant national planning policy, guidelines issued under Section 28 of the Planning and Development Act 2000, as amended (referred to as the 'Act'), regional planning policy, and local planning policy (the Dublin City Development Plan 2022-



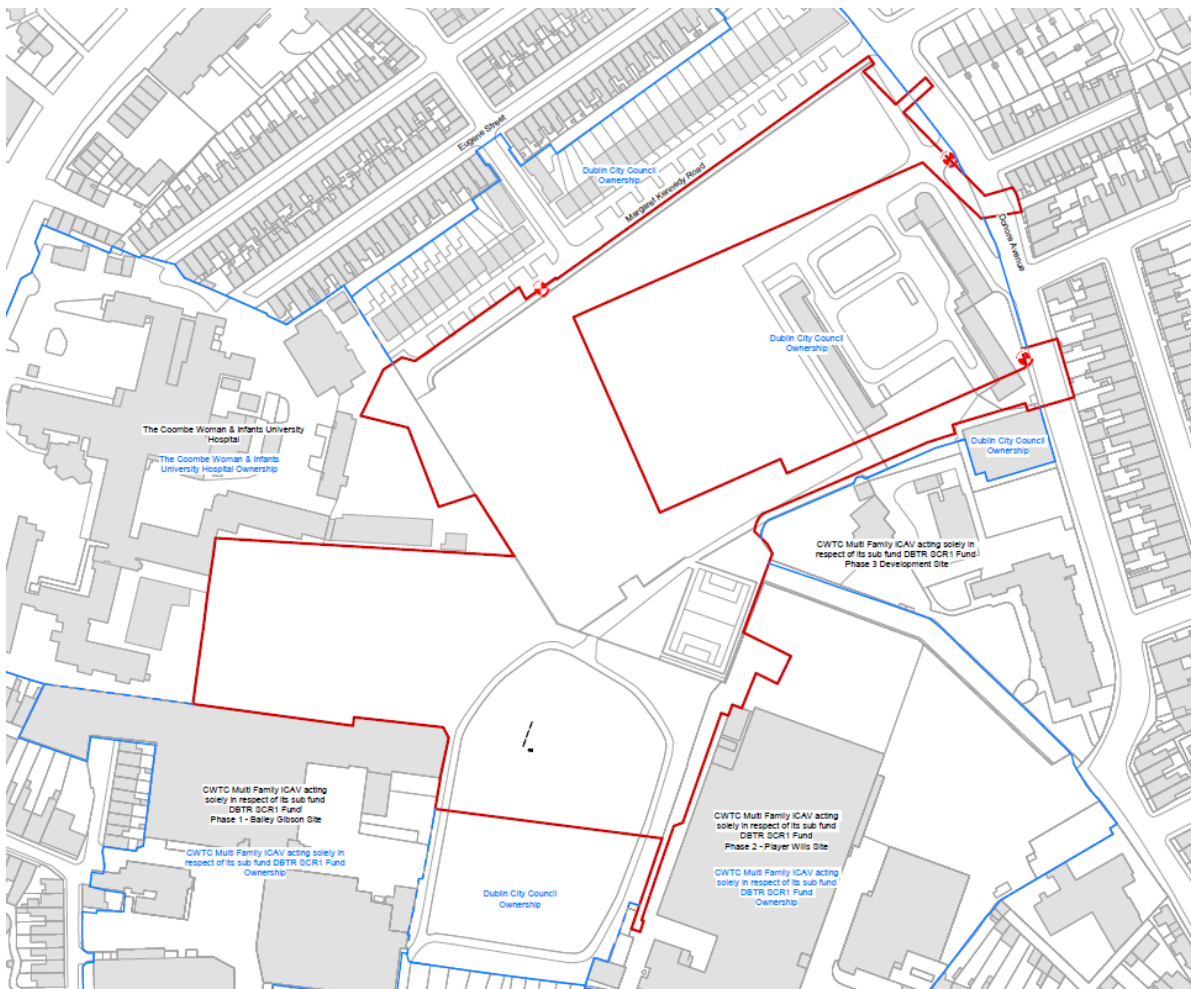
2028). Assessment of the proposed development against the policies and objectives of the 2016-2022 City Development Plan is set out in Appendix 1 to this report.

- 1.8 This report should be read in conjunction with the accompanying detailed documentation (including the Environmental Impact Assessment Report (EIAR) which has been prepared by the design team, including Metropolitan Workshop (MW) Architects, AECOM, Enviroguide Consulting, Redkite, B-Fluid, Altermar, John Spain Associates (JSA), 3D Design Bureau (3DDB) and Innovision.
- 1.9 A cover letter prepared by JSA accompanies this application for approval which lists the comprehensive range of documentation submitted.
- 1.10 The proposed development as now submitted to An Bord Pleanála under Section 175 of the Planning & Development Act 2000, as amended, has been designed having regard to an analysis of the subject site, its characteristics and surroundings, surrounding planning history, national, regional and local planning policy, and an iterative design process guided by extensive discussions and pre-application consultations with Dublin City Council.



## 2.0 SITE LOCATION AND CONTEXT

- 2.1 The subject site extends to 3.26 ha (as set out in Figure 2.1 below) and forms part of the site of the former St. Teresa's Gardens social housing complex located on Donore Avenue. The site is generally bounded by Donore Avenue to the northeast, Margaret Kennedy Road to the northwest, The Coombe Women & Infants University Hospital to the west, the former Bailey Gibson factory buildings to the southwest, and the former Payer Wills factory to the southeast. Access to the site is from Margaret Kennedy Road.
- 2.2 The application site forms part of a larger area which has been designated as a Strategic Development and Regeneration Area in the Dublin City Development Plan 2022-2028. SDRA 11, St Teresa's Gardens and Environs includes the original St. Teresa's Gardens flat complexes, together with the former Player Wills & Bailey Gibson factory buildings, and parts of the Coombe Women & Infants University Hospital.



**Figure 2.1: Site Location. Source: MW Architects (2022)**

- 2.3 The cleared site of the demolished flat blocks forms the majority of the application site, with the two remaining blocks occupied solely at ground floor. These two remaining blocks are due to be demolished by Dublin City Council under a Part 8 permission (Reg. Ref. 2475/18). There is a small overlap with the redline of this



application and the subject proposal. The remaining parts of the site are vacant and overgrown. There is also a five-a-side playing pitch with surrounding fencing and lighting, which is not in use, and is proposed to be removed as part of the redevelopment.

- 2.4 The site of the application also incorporates a small part of The Coombe Women & Infants University Hospital car park to accommodate necessary sub-surface water service connections, and a small sliver of land adjoining the former Player Wills factory owned by Hines. The redline boundary also extends out into Margaret Kennedy Road and Donore Avenue to also permit water/drainage connections.

### **Surrounding Context**

- 2.5 Located in the south-west inner city, the area surrounding the application site contains a broad mix of uses. The broader townscape of the area is varied, with building heights and urban grain differing in line with the different eras of construction.
- 2.6 This ranges from fine-grain, low rise Victorian and early 20<sup>th</sup> century dwellings along the South Circular Road area to the south, the Donore Avenue to the east, and the Cameron Street area to the northwest of the site, to a coarser grain with higher buildings constructed later in the 20<sup>th</sup> century and early 21<sup>st</sup> century along Cork Street. Notably, the surrounding area contains several former warehouse type buildings, which are due to be regenerated as part of the overall ambitions for SDRA 11 in the Dublin City Development Plan 2022-2028.
- 2.7 The area is highly accessible, particularly in terms of sustainable travel, and is accessible from a high quality bus corridor on Cork Street, the Red Line Luas, and cycling infrastructure along the Grand Canal to the south and Cork Street to the west. The area therefore has the potential to accommodate a significant level of sustainable residential development.





**Figure 2.2: Subject site in the wider south inner city context. Source: Google Maps.**



### **3.0 PUBLIC CONSULTATIONS**

- 3.1 The proposed development has been subject to extensive pre-application engagement with the public to ensure that knowledge, views and concerns of from local and key stakeholders would be taken on board. This included the St. Teresa's Gardens Regeneration Board, local residents, visitors and workers in the environs of the project site. This was a non-statutory public consultation process.
- 3.2 The formal, public-facing commencement of the project was marked with the publication of the project website, <https://donoreproject.ie/>. This website includes all CLO (Community Liaison Office) contact details and all activities and events completed during the consultation.
- 3.3 It was published to serve as a centralised resource for all communications, consultation and engagement activities, and as a resource library of all activities and publications relating to the project as it progressed. The engagement process to date for the Donore Project has been supported by a phone line and email contact for any queries.
- 3.4 A total of 22 no. meetings/public engagement sessions were held throughout the different Phases of the public consultation (A, B and C). Phase A (Initial Communications) and Phase B (Concept Proposal) were completed during 2021. These initial phases focused on the emerging project designs when the project was in its early stage of assessment. The Project Team took account of the feedback and comments received during these earlier consultations and sought to address the observations where possible in the Phase C Consultation (Detailed Proposals). Details of Phase D11 of the Consultation are now published online at <https://donoreproject.ie/phase-d-consultation/>. Phase D of the Donore Project will keep stakeholders updated of the progress with the planning application submission and post-planning decision project milestones.
- 3.5 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.





**Figure 3.1: Overview of public consultation process (Source: [www.donoreproject.ie](http://www.donoreproject.ie), 2022).**



## 4.0 DEVELOPMENT DESCRIPTION

4.1 The proposed development consists of demolition of the existing boundary wall on Margaret Kennedy Road, existing five-a-side playing pitch, and associated fencing and lighting on site; and the construction of a residential development set out in 4 no. blocks ranging from 2 no. to 15 no. storeys above ground level, providing 543 no. social and cost rental apartments: 225 no. 1 bedroom apartments (36 no. 1 person, 189 no. 2 person), 52 no. 2-bed (3 person) apartments, 222 no. 2-bed (4 person) apartments, and 44 no. 3 bedroom apartments. The proposal will also provide for a retail/café unit (168 sq.m.), mobility hub (52 sq.m.) and 952 sq.m. of community, artist workspace, arts and cultural space, including a creche, set out in 4 No. blocks.

4.2 The description of the proposal as set out within the public notices is as follows:

*“In accordance with Section 175 of the Planning and Development Act 2000 (as amended) The Land Development Agency, on behalf of Dublin City Council, gives notice of its intention to make an application for approval to An Bord Pleanála for a seven year permission in relation to a proposed residential development at this site located on the former St. Teresa’s Gardens, Donore Avenue, Dublin 8. The site is bound by Donore Avenue to the north-east, Margaret Kennedy Road to the north-west, The Coombe Women & Infants University Hospital to the west, the former Bailey Gibson factory buildings to the south-west, and the former Player Wills factory to the south-east. The development will consist of the construction of a residential scheme of 543 no. apartments on an overall site of 3.26 ha.*

*The development (GFA of c. 53,227 sqm) contains the following mix of apartments: 225 No. 1 bedroom apartments (36 no. 1-person & 189 no. 2-person), 274 No. 2 bedroom apartments (including 52 No. 2 bed 3 person apartments and 222 No. 2 bed 4 person apartments), 44 No. 3 bedroom 5-person apartments, together with retail/café unit (168 sq.m.), mobility hub (52 sq.m.) and 952 sq.m. of community, artist workspace, arts and cultural space, including a creche, set out in 4 No. blocks.*

*The breakdown of each block will contain the following apartments:*

- *Block DCC1 comprises 111 No. apartments in a block of 6-7 storeys;*
- *Block DCC 3 comprises 247 No. apartments in a block of 6-15 storeys;*
- *Block DCC5 comprises 132 No. apartments in a block of 2-7 storeys;*
- *Block DCC6 comprises 53 No. apartments in a block of 7 storeys;*

*The proposed development will also provide for public open space of 3,408 sqm, communal amenity space of 4,417 sqm and an outdoor play space associated with the creche. Provision of private open space in the form of balconies or terraces is provided to all individual apartments.*

*The proposed development will provide 906 no. residential bicycle parking spaces which are located within secure bicycle stores. 5% of these are over-sized spaces which are for large bicycles, cargo bicycles and other non-standard bicycles. In addition, 138 spaces for visitors are distributed throughout the site.*

*A total of 79 no. car parking spaces are provided at undercroft level. Six of these are mobility impaired spaces (2 in each of DCC1, DCC3 & DCC5). 50% of standard*

*spaces will be EV fitted. Up to 30 of the spaces will be reserved for car sharing (resident use only). A further 15 no. on-street spaces are proposed consisting of:*

- *1 no. accessible bay (between DCC5 & DCC6)*
- *1 no. short stay bay (between DCC5 & DCC6)*
- *1 no. crèche set-down / loading bay (between DCC5 & DCC6)*
- *1 no. set-down / loading bay (northern side of DCC5)*
- *1 no. set-down/loading bay (northern side of DCC3)*
- *10 no. short stay spaces (north-east of DCC1)*

*In addition, 4 no. motorcycle spaces are also to be provided.*

*Vehicular, pedestrian and cyclist access routes are provided from a new entrance to the north-west from Margaret Kennedy Road. Provision for further vehicular, pedestrian and cyclist access points have been made to facilitate connections to the planned residential schemes on the Bailey Gibson & Player Wills sites for which there are extant permissions (Ref. No.'s ABP-307221-20 & ABP-308917-20).*

*The development will also provide for all associated ancillary site development infrastructure including site clearance & demolition of boundary wall along Margaret Kennedy Road and playing pitch on eastern side of site and associated fencing/lighting, the construction of foundations, ESB substations, switch room, water tank rooms, storage room, meter room, sprinkler tank room, comms room, bin storage, bicycle stores, green roofs, hard and soft landscaping, play equipment, boundary walls, attenuation area and all associated works and infrastructure to facilitate the development including connection to foul and surface water drainage and water supply.*

- 4.3 The site represents underutilised land in a central highly accessible location with an excellent opportunity to provide a high-quality residential development. Under the Dublin City Development Plan 2022-2028 the subject site is zoned Z14 Strategic Development & Regeneration Area, and the objective 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.'

#### Site Area

- 4.4 The total site area is 3.26 ha. This includes lands owned by Dublin City Council, The Coombe Women & Infants University Hospital and Hines (Player Wills) and letters of consent are included with the application. The extent of land within the Net Development Area (NDA) is 2.05 ha. See Drawing No STG-MW-S1b-00-ZZ-DR-A-1000000-Site Location Plan-S4-P1 prepared by MW Architects for further details.

#### Demolition of Structures

- 4.5 The proposed development does not entail the demolition of any buildings. However, the existing boundary wall along Margaret Kennedy Road is to be demolished, as is a five-a-side playing pitch, together with its associated fencing and lighting.
- 4.6 The two remaining blocks of the original St Teresa's Gardens are to be demolished by Dublin City Council in advance of the commencement of development proposed in this application, made as existing Part 8 approval. Please see attached letter from Dublin City Council confirming same as Appendix 3.



- 4.7 The Demolition and Construction and Environmental Management Plan (CEMP) prepared by Enviroguide provides further details on the demolition and construction activities.

#### Gross Floor Area

- 4.8 The total gross floor area is 53,227 sq.m. The gross floor area of the residential component is 46,953, with a further 5,080 of ancillary space. A retail/café unit (168 sq.m.), mobility hub (52 sq.m.) and 952 sq.m. of community, artist workspace, arts and cultural space, including a creche are also provided.

#### Plot Ratio and Site Coverage

- 4.9 The plot ratio is 2.60 and this is based on the extent of built development above ground in accordance with the Dublin City Development Plan definition. The plot ratio range for 'regeneration lands' provided for in the Development Plan is 1.5 - 3.0
- 4.10 The site coverage equates to 46.9% based on the net development area. The site coverage range for 'regeneration lands' provided for in the Development Plan is 50% - 60%. For further discussion of Development Plan provisions in this regard please see Section 8.0.

#### Architecture and Design

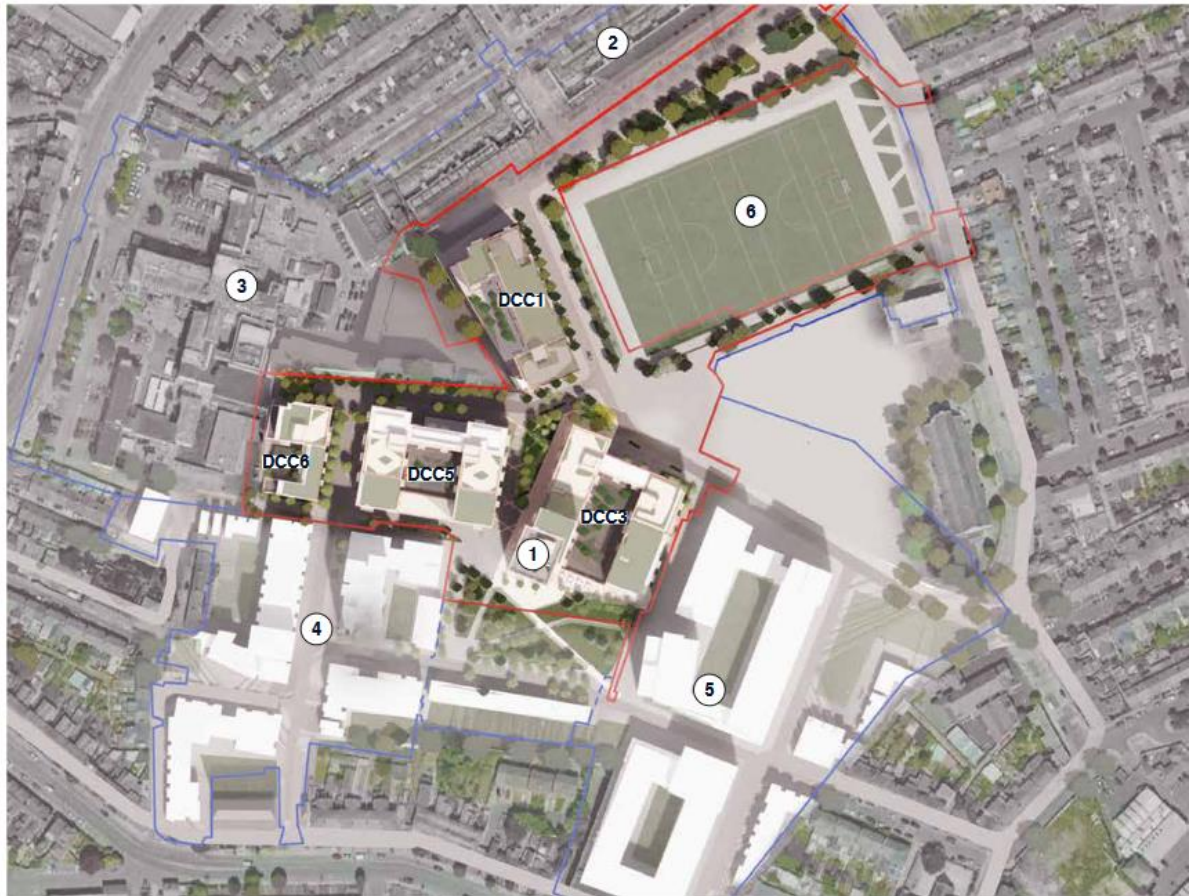
- 4.11 As described in the Architectural Design Statement (ADS) prepared by MW Architects the vision for Donore Project is:

*"The proposed site offers a distinct opportunity to develop a vibrant, sustainable and compact residential neighbourhood. which is well connected and supports the social, economic, and cultural well-being of the Donore area.*

*At the heart of this vision is the desire to create an inclusive and integrated community with high quality sustainable homes and supporting amenities, set in an attractive public realm with a network of links to enhance well-being and integration with the surrounding community."*

- 4.12 The site layout has evolved following consideration of key site features, constraints and opportunities, including land use zonings, planning policy objectives, site topography, surrounding land uses and access.
- 4.13 The design seeks to respond to the various scales and street contexts in the surrounding area, as well as to the extant permissions for residential schemes on the adjoining Bailey Gibson & Player Wills sites.
- 4.14 The design of the proposed development has had regard to the guiding principles for the St. Teresa's Gardens SDRA 11 set out in the Development Plan, including, but not limited to, building height, mix or tenure, street pattern/ integration, public realm and street activation. At ground floor level it is proposed to provide a mix of residential, creche, artist workspace and cultural space and restaurant uses as well as a mobility hub concentrated in the centre of the site around the main public open space area, which will act as a focal point for the scheme and provide a seamless

connection between the site and the proposed other main areas of open space within the SDRA .



**Figure 4.1: CGI view of proposed development in existing with extant permissions in context (Source: MW Architects, 2022)**

**Key**

1. 15 Storey Tower in DCC3
2. Margaret Kennedy Road Housing
3. The Coombe Hospital
4. Hines Phase 1 Bailey Gibson 2 Site (Ref. ABP-314171/22) - Being determined by An Bord Pleanála at the time of writing
5. Hines Phase 2 Player Wills Site - Extant Permission Ref. ABP-308917-20 under judicial review at time of writing
6. Future Playing Pitch Proposed as Part of Current Bailey Gibson 2 Planning Application Ref. ABP 314171-22

- 4.15 The proposed site layout has also been developed in response to the established context and associated extant permissions (Player Wills and Bailey Gibson sites), and the Bailey Gibson 2 application currently before the Board.
- 4.16 The proposed development will introduce a site-specific design and layout which delivers significant urban design benefits within a substantial urban block in the centre of the SDRA, open up new connections in the area which has lacked permeability heretofore due to the site being inaccessible for many years.



- 4.17 The design has evolved to address comments raised during the extensive pre-application consultation process. The Landscape and Visual Impact Assessment, included as Chapter 10 of the EIAR, includes a series of existing views and proposed photomontages of the scheme to demonstrate the impact of the development on the surrounding area.

- 4.18 As set out in the MW Architects Design Statement:

*“In general red brick will be used for the external façades while buff brick will be used to the internal courtyards or ‘rear’ façades. This approach has parallels with existing housing and a number of non-residential buildings in the area.*

*Further distinction is achieved through the use of mortar colour variation, a two storey plinth will be common to all 4 buildings acting as a linking mechanism within this development, the mortar changes to a lighter colour from second floor up.”*

- 4.19 The architectural language has been carefully considered and developed throughout the design process in response to the site context and overall layout / orientation of the site. A consistent architectural language has been employed across the DCC1, 3,5 and 6 buildings, with a family of materials, details and facade principles.



**Figure 4.2: CGI extract from façade detail (Source: MW Architects, 2022)**

### Urban Layout, Streets and Open Space

- 4.20 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 introducing permeability improvements across the site. Pedestrians and cyclists are given priority with provision of new streets within the site and a new connection linking adjacent planned development and existing residential area to the north at Margaret Kennedy Road.
- 4.21 The proposed Donore Project Park will form the central area with an active new public open space and will provide a new pedestrian route through the site linking to the main public open space areas proposed in the Guiding Principles for SDRA 11, which are the municipal playing pitch to the north and the 'Player's Park' to the south. The new café restaurant will also front this area, and the park will provide a natural space for residents to meet within the development.
- 4.22 In total 3,408 sqm. of Public Open Space is to be provided on site within the net developable area, which equates to 16.64% of area.



**Figure 4.3: site circulation for pedestrians, cyclists and vehicles (Source: MW, 2022).**

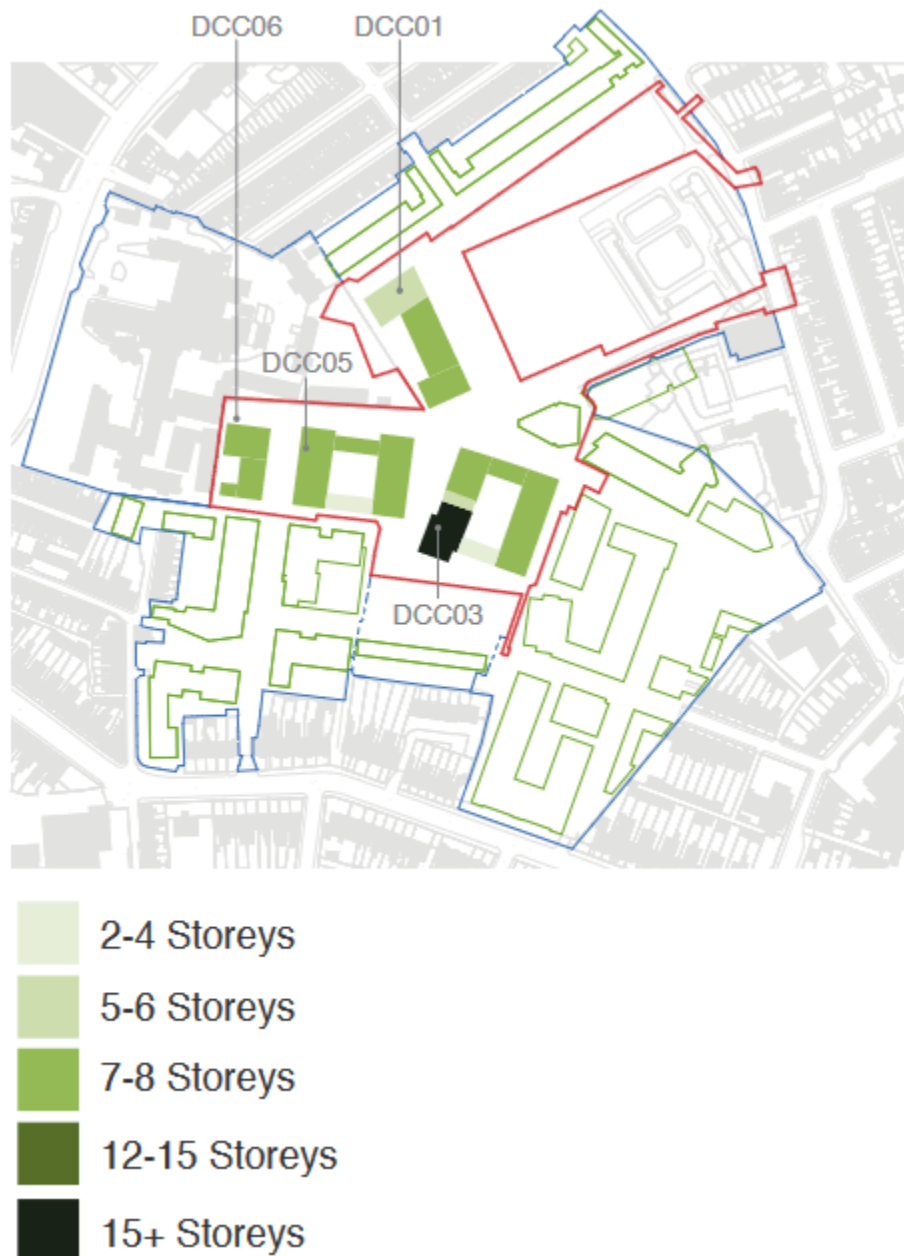


### Height, Scale and Massing

- 4.23 The massing has been developed through consultation with DCC and in response to feedback received as part of public consultation. As outlined in the Architectural Design Statement, a total of 22 no. meetings/public engagement sessions<sup>1</sup> were held throughout the different Phases (A, B and C). All feedback and submissions have been carefully considered by the LDA and the Project Design Team for the final proposal.
- 4.24 The current massing aligns with the guiding principles for SDRA 11 in the 2022-2028 City Development Plan. The majority of building heights are between 6 and 8 storeys, with one mid-rise building proposed to the southwest of DCC3 and with 1 and 2 storey elements proposed to the south DCC3 and DCC5 to improve access for sunlight and daylight. A single story podium car park is proposed as part of DCC1, DCC3 and DCC5.
- 4.25 Heights range from 2 no. to 15 no. storeys, broken down per block as follows:
- Block DCC1 comprises 111 No. apartments in a block of 6-7 storey
  - Block DCC3 comprises 247 No. apartments in a block of 6-15 storeys;
  - Block DCC5 comprises 132 No. apartments in a block of 2-7 storeys;
  - Block DCC6 comprises 53 No. apartments in a block of 7 storeys;
- 4.26 The building heights seeks to respond to the surrounding context in terms of the transition from the surrounding single/two storey buildings, with a stepped approach to the height with the tallest building located in the centre of the site and which adjoins the main area of public open space. This is consistent with the Guiding Principles for the St. Teresa Gardens & Environs SDRA set out in the Dublin City Development Plan 2022-2028.
- 4.27 The Development Plan 2022-2028 considers SDRAs as appropriate locations for increased height and density in accordance with the Guiding Principles of the SDRA subject to considerations of Appendix 3, Table 3 of the Development Plan. We have addressed the Criteria Contained within Table 3 in Section 8.0 of this report.
- 4.28 The Guiding Principles for the SDRA 11, as contained in the Development Plan, also set out a height strategy for the SDRA. The Guiding Principles promote increased heights relative to the surrounding areas, with a baseline height of 3-8-storeys, and provision for locally higher buildings of up to 15-storeys as part of the wider proposals for the site. This includes three potential locations for such locally higher building located within the subject site. The proposed development incorporates one building of 15-storeys on one of these potential locations, with the majority of the proposed buildings being 6-7-storeys. The proposed development therefore conforms with the height guidelines for St. Teresa's Gardens SDRA 11.

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<sup>1</sup> [https://donoreproject.ie/wp-content/uploads/2022/04/DONORE-PROJECT\\_Record-on-Stakeholder-and-Community-Engagement-V1.4-Final.pdf](https://donoreproject.ie/wp-content/uploads/2022/04/DONORE-PROJECT_Record-on-Stakeholder-and-Community-Engagement-V1.4-Final.pdf)



**Figure 4.4: Overview of height strategy (Source: MW Architects, 2022).**

- 4.29 The proposed heights are considered appropriate for this site in the context of the land use zoning objective, the guiding principles for St Teresa's Gardens SDRA 11 as set out in the City Development Plan, the substantial size of the urban block, the surrounding context and the positive urban design and placemaking benefits that the development will deliver and are consistent with the policies on building height set out in the Dublin City Development Plan 2022-2028. In addition, we refer the Board to Section 8 of this report which provides further support for the proposed heights having regard to the criteria listed at Section 3.2 of the Building Height Guidelines, with reference to accompanying reports. Residential Development
- 4.30 As noted above, the proposed development includes a total of 543 no. residential units, split across four blocks. The unit breakdown is as follows:



- 225 no. 1 bedroom apartments (36 no. 1-person & 189 no. 2-person);
- 274 no. 2 bedroom apartments (52 no. 2 bed 3 person apartments and 222 no. 2 bed 4 person apartments);
- 44 no. 3 bedroom 5-person apartments.

4.31 The proposed apartments have been designed to accord with the Apartment Guidelines 2020 and further details are set out on this below, in addition to the HQA prepared by MW Architects. A justification for the proposed Unit Mix is set out in Section 8 and 10 of this Report.

4.32 The scheme provides a 28% social housing / 72 % cost rental split in tenure.

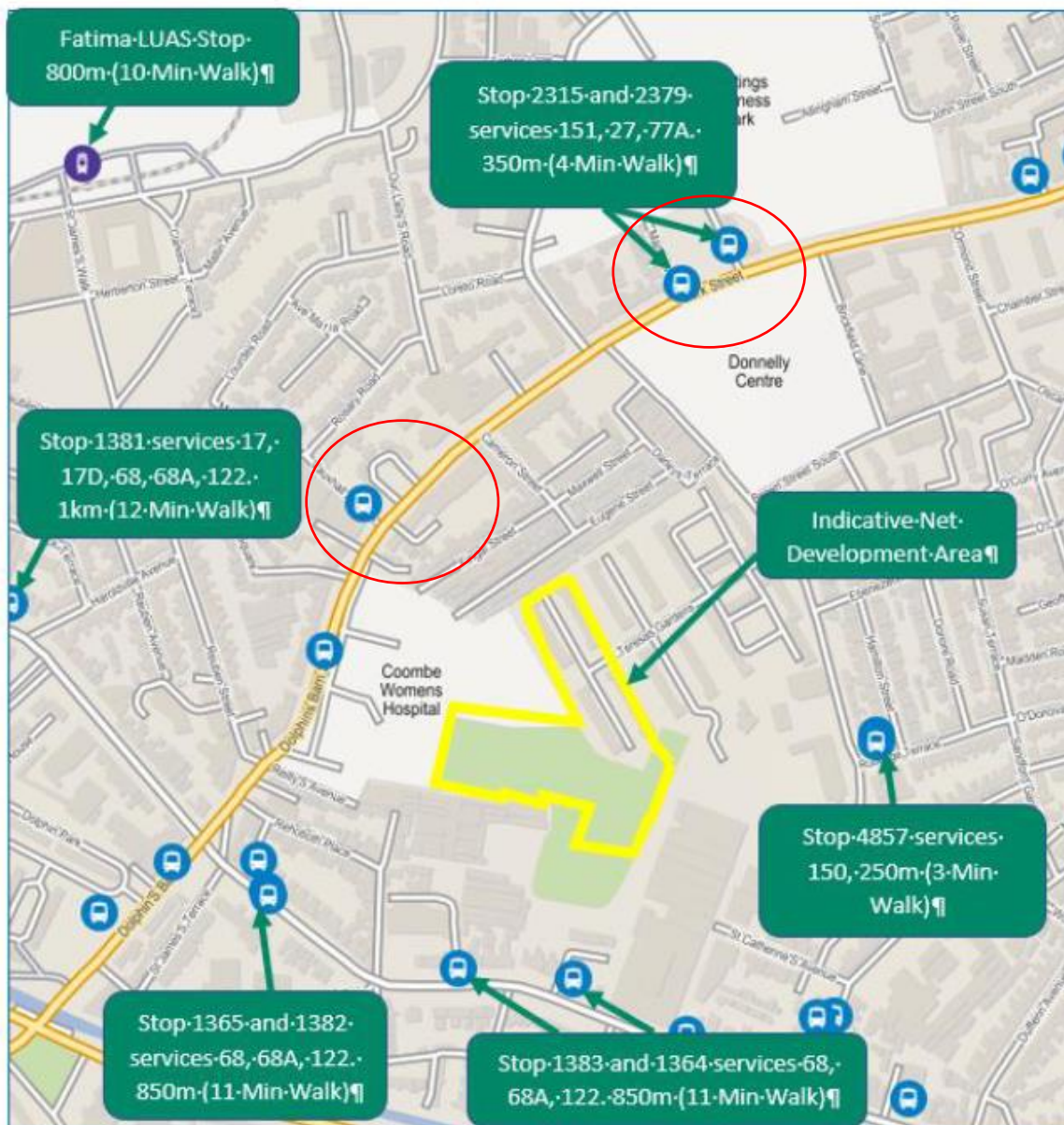


**Figure 4.5: overview of tenure mix (Source: MW Architects, 2022)**

#### Aspect

- 4.33 The proposed scheme provides for 45% of apartments to have dual aspect. The quantum of dual aspect units meets the requirements under the Apartment Guidelines SPPR 4 of 33% dual aspect units in central / accessible urban locations, which the subject site clearly falls within.
- 4.34 The subject site is situated within walking distance of existing high-quality bus There are 8 no. bus services located within a 400m walking distance of the site. (Dublin Bus No. 27 which operates every 10 minutes on Cork Street is located 4 minute walking distance away).

- 4.35 The Luas serves the area via the redline, the nearest station is location at Fatima Luas stop approximately 10-12 minute walking distance. The capacity of nearby public transport has been assessed by AECOM within the Public Transport Capacity Assessment enclosed with this application.



**Figure 2.5 Existing Bus Stops**

**Figure 4.6: approximate locations of public transport facilities with stops within 400m / 4 minute walk identified by red circle. (Source: AECOM, 2022).**

- 4.36 The subject site therefore constitutes a 'central and / or accessible urban location' as defined within the 2020 Apartments Guidelines. Please see TTA prepared AECOM for full details.
- Dual aspect -246 dwellings -43%.
  - Triple aspect - 13 dwellings -2%.
  - Single aspect -284 dwellings -55%



- 4.37 Larger apartment sizes including 2- and 3-bedroom apartments are located on corners where dual aspect is achieved. Where possible, living spaces are located on corners to take maximum advantage of the corner dual aspect and ensure higher daylight levels into the kitchen and living spaces.

#### Landscape Strategy

- 4.38 As set out in the AECOM Landscape Architecture and Public Realm Design Report: the vision for the scheme is: *“To create a high quality integrated residential development and landscape proposals which enhance and fulfil the potential of the site indicated in the DCC SDRA 11...”*

- 4.39 This Report sets out the Concept for the landscape design strategy:

*“The inspiration for the landscape design is taken from the area’s rich weaving history and Huguenot legacy. Weaving has a long association of influencing the function and design of landscaped spaces in the local area whether that was in the past through the presence of the old mill buildings and associated infrastructure or more recently through the creation of public parks (e.g. Weaver’s Park).*

- 4.40 A key focus of this strategy is Donore Project Park,

*“The Donore Project Park consists of a series of high quality, functional, amenable, well overlooked, permeable active and passive open spaces and informal play spaces which are interconnected with a network of pedestrian and cycle routes.*

*“It is the Primary Pedestrian Space at the centre of the SDRA 11 Guiding Principles and it links the various open spaces and residences together. Passive surveillance is provided from DCC1, DCC3 & DCC5 as well as Players Park. Donore Park is a place for resting, active and passive uses and informal play. It is the link between the physical, social and environmental influences of the residences and Player Wills Park to the south and the GAA pitch to the north.*

*“The Donore Project Park provides visual integration as it connects the different projects which make up the Framework Plan. This is achieved through full integration of the design concepts of the adjacent proposals and appropriate selection of the hard and soft landscaping palette.”*



**Figure 4.7: Diagram of landscaping and open space strategy (Source: MW Architects, 2022).**

#### Communal Amenity Space

- 4.41 The proposed development includes the provision of c. 4,417 sq. m of external communal amenity space at ground floor level, podium level, in addition to the provision of external communal terraces at roof level for residents. These proposals meet and exceed the minimum required areas set down in Appendix 1 of the Apartment Guidelines (which amounts to 3,351 sq. m).
- 4.42 Communal Amenity Space is proposed in compliance with the requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments 2020, and the Dublin City Development Plan 2022-2028 with the minimum required area and proposed areas set out per block below.

**Table 4.1: Communal open space provision:**

	Required	Proposed
<b>DCC1:</b>	726 sqm	1,069 sqm
<b>DCC3:</b>	1,505 sqm	1,962 sqm
<b>DCC5:</b>	842 sqm	965 sqm
<b>DCC6:</b>	316 sqm	421 sqm

- 4.43 Each block contains a proportion of ground or first floor level amenity space and roof terrace spaces and will be centrally managed and maintained by The LDA & DCC.



- 4.44 Blocks DCC1, DCC3 and DCC5 have courtyards at first floor level on a podium above the car parking. Each will be accessed through the main entrances and via a stair core or elevator. DCC 6 also provides a ground floor courtyard bounded by The Coombe Women & Infants University Hospital with access via the main entrance and a gated portion to the south, used for maintenance/ emergency access only.
- 4.45 DCC3's courtyard is completely open to the southern side allowing maximum sunlight to enter into the space and provides views stretching out over the proposed Players Park.
- 4.46 One of the key design principles of the proposed landscape strategy is delivering variety in the amenities provided. In addition to the publicly accessible streetscape, public realm and public open space amenity delivered at ground level. Further details on the distinctive key characteristics and opportunities offered by these semi-private landscape amenity spaces are set out in the Landscape Report. These semi-private communal amenity spaces will provide congregation spaces for the residents. They will act primarily as informal congregation areas allowing for views over the proposed development and towards the adjacent properties and open space beyond.
- 4.47 Buffers will be used to create atmosphere as well as define the space. A variety of edges will be used to create spaces which can have a diversity of uses. Flexible common areas will also be provided to allow for picnics, casual seating areas and informal play in order to achieve a balance of flexibility and place making. The planting scheme for the 1st Floor Podium and Roof Terrace communal amenity spaces is a key element of the design. Soft landscaping elements will be used to create atmosphere, screen for privacy, delineate spaces, create visual interest, and provide for a variety of programming.

#### Private Amenity Space

- 4.48 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.

#### Childcare Facilities

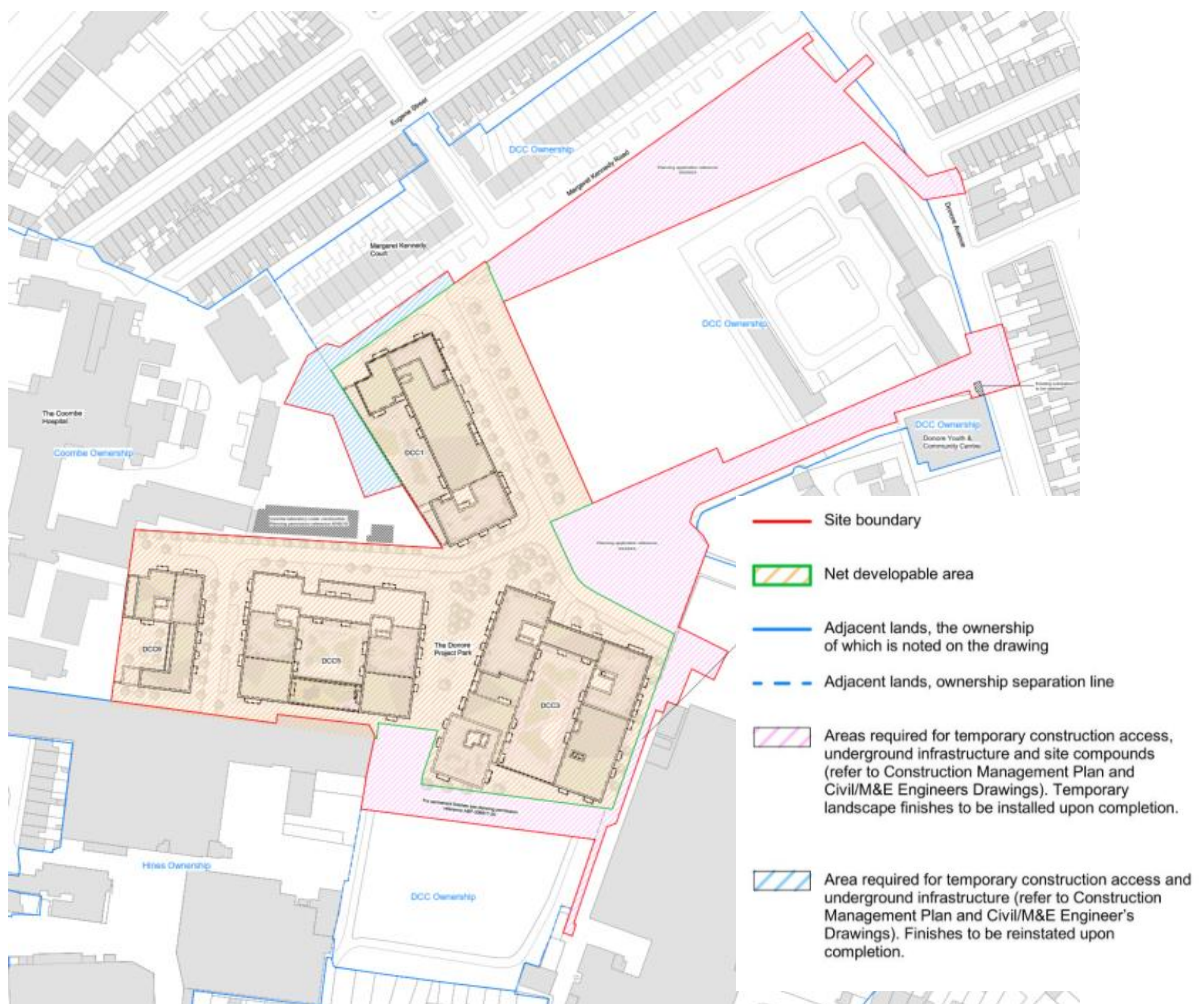
- 4.49 The proposed development includes 1 no. creche facility with a GFA of 664 sq.m and associated outdoor play area with an area of 225 sq.m. It is considered that this facility will be sufficient to accommodate the demand for childcare facilities generated by the proposed development, with potential additional capacity to accommodate any demand in the surrounding area. This accords with section 4.7 of the Apartment Guidelines and the Dublin City Development Plan 2022-2028. Further details are set out in the Community and Social Audit prepared by John Spain Associates.
- 4.50 The crèche is located at the south of DCC5 at ground and first floor level with a second-floor roof terrace. The crèche is designed to accommodate up to 130 children and will support the development and the wider local area. Its primary frontage faces onto a pedestrianised landscaped space which will connect to Player's Park and the Donore Project Park. It is served by a vehicular drop off space to the west of DCC5 and 2 no. staff parking spaces allocated within DCC5 podium. Cycle parking is located at the entrance for staff and visitor parking.

### Building Lifecycle Report

- 4.51 A Building Lifecycle Report has been prepared by MW Architects, in consultation with the applicant and design team, and is submitted as part of this application. This report is in accordance with Section 6.13 of the 2020 Apartment Guidelines and outlines measures that have been incorporated into the design and proposed construction to address the lifecycle requirements of the proposed scheme.

### Density

- 4.52 The net residential density of the proposed development will be 264.9 units per hectare with gross density of 166.5 u/ha. The net density is based on the extent of developable site area for the residential blocks of 2.05 ha and a total of 543 no. residential units, see Figure 4.8 below for indication of site area which net density is based on. It is considered that the subject site is a suitable location for higher density development, as discussed further in Section 8 below.



**Figure 4.8: Net Development Area Plan. Source: MW Architects 2022**

### Additional Community Uses and Facilities

- 4.53 The proposed development includes a mobility hub on the ground floor of DCC3, and 952 sq.m. of community, artist workspace, arts and cultural space.



- 4.54 A café / restaurant unit with a GFA of 168 sq.m is proposed in Block DCC3, which opens onto the proposed new Donore Project Park and adjacent to the proposed Player's Park and will be accessible from the new pedestrian routes through the site.

#### Lighting Strategy

- 4.55 The landscaping proposals include a Lighting Strategy, and this is supported by an External Lighting Design Report prepared by AECOM. A primary objective of the strategy is to create a safe night-time environment, whilst ensuring no undue impact on neighbouring residents.

#### Arboricultural Impact Assessment

- 4.56 We refer to the Arboricultural Assessment prepared by CMK Horticultural. This confirms the loss of trees from the site area will be mitigated with the planting of new trees, shrubs, and hedging within the completed landscaped development using a mix of tree sizes and species that will complement the development and secure long-term tree cover in the area.
- 4.57 Further details on the planting strategy are set out in the Landscape Design Statement. Multi-stem trees have been selected as a majority form to maximise and enhance the visual amenity of the space, where a more upright tree form will be used to distinguish route-ways. Large specimen trees have been selected and positioned to create separation and screening to spaces, with tree types that are visually attractive and will offer dynamic character through their natural colour and movement.

#### Vehicular Access and Site Entrances

- 4.58 It is proposed that the sole vehicular access to the development be a new access junction on Margaret Kennedy Road, at the north-western boundary of the site.
- 4.59 Access to the podium car parks will be regulated by means of a barrier control system, located at the entrances at surface level.
- 4.60 Pedestrian and cyclist permeability throughout the site shall be accommodated through proposed pedestrian and provision has been made to ensure cyclist and pedestrian links to the planned developments on the adjoining sites to the south and east of the subject site. Pedestrian permeability shall also be ensured to Donore Avenue, to the north-east of the subject development.
- 4.61 Further details are set out in the Transport & Traffic Assessment (TTA) prepared by AECOM.

#### Car, Bicycle and Motorcycle Parking Provision

- 4.62 A total of 79 no. car parking spaces are provided at undercroft level. Six of these are mobility impaired spaces (2 in each of DCC1, DCC3 & DCC5). 50% of standard spaces will be EV fitted. Up to 30 of the spaces will be reserved for car sharing (resident use only). A further 15 no. on-street spaces are proposed consisting of:
- 1 no. accessible bay (between DCC5 & DCC6)
  - 1 no. short stay bay (between DCC5 & DCC6)
  - 1 no. crèche set-down / loading bay (between DCC5 & DCC6)

- 1 no. set-down / loading bay (northern side of DCC5)
- 1 no. set-down/loading bay (northern side of DCC 3)
- 10 no. short stay spaces (north-east of DCC1)

- 4.63 The proposed development will provide 906 no. residential bicycle parking spaces which are located within secure bicycle stores. 5% of these are over-sized spaces which are for large bicycles, cargo bicycles and other non-standard bicycles. In addition, 108 spaces for visitors are distributed throughout the site.
- 4.64 A Mobility Hub is to be included in the ground floor of DCC3 and through this hub mobility measures will be made available to future residents and workers to inform them of walking routes, public transport, bike and car sharing. Further details are also set out in the Transport & Traffic Assessment (TTA) and Mobility Management Plan Framework prepared by AECOM Consulting Engineers.

#### Delivery and Service Arrangements

- 4.65 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.
- 4.66 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 for further details.

#### Site Services

- 4.67 The proposed development site is well serviced in terms of public drainage and water supply infrastructure. There are no constraints envisaged in the existing public drainage infrastructure which could impact upon the delivery of the proposed development. We refer to the Engineering Service Report prepared by AECOM for further details.
- 4.68 A Mechanical and Electrical Report prepared by AECOM is submitted with the application in relation to the infrastructure services for the site, including gas, ESB supply, communication services, security services and water services.

#### Flood Risk

- 4.69 The proposed development is located within Flood Zone C: Low Probability of Flooding. A Site-Specific Flood Risk Assessment report has been prepared by AECOM for the proposed development and accompanies the planning documents. This is also considered as part of Chapter 'Hydrology' in the EIAR.

#### Storm Water Drainage / SuDS

- 4.70 Please refer to the Infrastructure Report that accompanies this report for further information. In accordance with the requirements of the Dublin City Development Plan, surface water run-off from the development will discharge by gravity into an attenuation tank located in the northeast corner of the site adjoining Margaret Kennedy



Road. Run-off from roof areas, pedestrian and paved areas shall drain by gravity to the attenuation tank. A number of SuDS proposals are also proposed:

- The use of green roofs on applicable roof space for the apartment blocks is proposed. Please refer to Landscape Layout for proposed details.
- The use of low water usage sanitary appliances to reduce the reliance on potable water supplies.
- Where feasible, local footpaths and hard-standing areas will be directed into tree pits or landscaped areas to allow for local infiltration.
- Road gullies will be trapped to allow for the removal of grit and other potentially harmful material entering the storm network.

#### Sustainability and Energy Statement

4.71 An Energy and Sustainability Statement have been prepared by AECOM and accompany this application. The proposed development will meet the highest standard of sustainable design and construction solutions where possible. 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, the layout of the development to encourage sustainable modes of transport etc. as outlined in the Architectural Design Statement accompanying this application, prepared by MW.

4.72 As set out in Energy and Sustainability Statement prepared by AECOM:

*"The design will be heavily influenced by the sustainability principles of reduce, reuse, renewables and continual improvement (renewal) of the approach. The energy design will also be heavily influenced by Part L of the Building Regulations - Conservation of Fuel and Energy (Dwellings) 2021 and Part L of the Building Regulations – Conservation of Fuel and Energy (Buildings other than Dwellings) 2021.*

*Passive energy reductions will be maximised through the specification of a high performing building fabric. Active energy reductions include the provision of a high efficiency air to water heat pump systems for space heating & domestic hot water, provision of mechanical heat recovery ventilation, specification of high efficiency lighting & controls and other discrete energy measures.*

*Embodied carbon will be a key consideration in the design. Materials of low embodied carbon, including recycled materials, will be preferred. Where possible locally sourced materials will be used to reduce the embodied carbon associated with transport.*

*A number of sustainable urban drainage systems (SuDS) are to be used to effectively intercept and treat water leaving the site including green roof and permeable paving at roof level, as well as swales, bio-retention, tree pits and porous asphalt at ground level. The green roof will provide matters that will allow local birds and insects to thrive. Native planting will be used to integrate with the local habitat."*

#### Construction and Demolition Management Plan

- 4.73 A Construction and Demolition Management Plan prepared by AECOM is submitted with the application and includes a description of the proposed works and how these works could be managed for the duration of the works on site. It also provides a proposed method statement on how demolition shall be carried out in line with the relevant legislation.

#### Waste Management Plans

- 4.74 A Construction and Demolition Waste Management Plan (CDWMP) and an Operational Waste Management Plan (OWMP) prepared by AECOM are submitted with the application.
- 4.75 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.
- 4.76 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.

#### Daylight and Sunlight Assessment

- 4.77 A comprehensive daylight and sunlight analysis of the proposed development, its impact on neighbouring properties, and the level of light which will be enjoyed by the residential units within the scheme has been undertaken by 3D Design Bureau. A Daylight and Sunlight Assessment report is submitted along with this application.
- 4.78 The impact assessment for this report has quantified the effect the proposed development would have on the level of daylight and sunlight received by neighbouring properties/environment that are in close proximity to the proposed development. They were assessed in various states/scenarios as detailed in the report.
- 4.79 In relation to scheme performance 3DDB stated that:

*"As stated and explained in detail within this report, significant work has been done with the design team to ensure acceptable levels of compliance were achieved, in particular with regard to scheme performance. The compliance rate of circa 80%-81% for SDA, with the permitted/submitted schemes in play (circa 87%-88% without them in play), should be considered very favourable, and in excess of compliance rates in other schemes within the SDRA 11, which have been permitted. Similarly the SE performance has also improved due to design changes and emphasis on dual and triple aspect units.*

*The sun on ground measured on the open amenity areas, internal courtyards and the rooftops show a high level of compliance where future occupants can expect to enjoy good levels of daylight."*

#### **Overview of Key Development Statistics (inclusive of Commercial)**

- 4.80 The following table sets out the proposed development's key statistics:



Site area	3.26 ha.
Net Developable Area	2.05 ha.
No. of residential units	543
1-bedroom units	225
2-bedroom units	274 (52 no. 2 bed 3 person and 222 no. 2 bed 4 person);
3-bedroom units	44
Gross floor area	53,227
Net Unit density	264 u/ha
Plot ratio	2.60
Site Coverage	46.9%
No. of dual / triple aspect units	45%
Part V	28%
Building Heights	Predominately 7 storeys, with one building 15 storeys
Car parking spaces	79 no. + 15 no. on-street
Bicycle parking spaces	906 no. + 138 no. visitor
Communal open space	4,417 sqm
Public open space	3,408 sqm

## 5.0 RELEVANT PLANNING HISTORY

- 5.1 A planning history search of the subject site was carried out using the Dublin City Council online planning search facility. There have been no recent applications for any significant form of redevelopment on the subject site.
- 5.2 As part of the planning application and EIAR preparation process JSA have undertaken a review of the recent planning history of the surrounding area, noting applications in proximity of the subject site. All significant applications within c.250 metres from the application site boundary were reviewed and assessed in terms of their potential implications for the proposed development in terms of cumulative impact assessment. However, other reports and Chapters within the EIAR have identified permitted developments in a wider context which are relevant to the assessment of the proposed development.

### **Reg. Ref.: ABP-314171-22 Former Bailey Gibson Site**

- 5.3 Current SHD application by CWTC Multi Family ICAV, acting solely in respect of its sub-fund DBTR SCR1 Fund, for the development of 345 no. residential units that will consist of 292 no. Build to Rent apartments, 49 no. Build to Sell apartments and 4 no. Build to Sell houses.
- 5.4 A decision on this application is due to be issued by An Bord Pleanála on the 14<sup>th</sup> of November of this year.

### **DCC Reg. Ref.: 4049/19 The Coombe Women & Infants University Hospital Laboratory Building permission**

- 5.5 The Development is described as set out in the public notices:

*“The development will consist of: a new four storey laboratory building (1340m<sup>2</sup>) within the existing Coombe site with the provision of rooftop plant and 2 no. rear extensions to the existing adjacent laboratory building to include a new link, office and store (68m<sup>2</sup>) with all associated site works. This application site is in S.D.R.A. no.12, St Teresa's Gardens and Environs Strategic Development and Regeneration Area.”*

- 5.6 DCC issued a Final Grant on 11 February 2020, this development is now under construction.

### **DCC Reg. Ref.: 3537/21 The Coombe Women & Infants University Hospital Colposcopy Building permission**

- 5.7 Planning permission for development at The Coombe Women & Infants University Hospital, Dolphin's Barn Street, Dublin 8, D08 XW7X on a 0.15-hectare site to the south-east of the hospital site, such site also including the existing Colposcopy building.
- 5.8 The Development is described as set out in the public notices:

*“The development for which planning permission is sought comprises of the development of a new dedicated Colposcopy/Women's Health Unit building of 3 no. storeys plus rooftop plant room which will be attached to the existing Colposcopy building to the west by way of glazed link. The development will include the partial*



*demolition of the eastern meeting room and lobby area wing to the existing Colposcopy building to facilitate the connection to the new building. The proposed building comprises of a 988 sq.m gross floor area building. The building will comprise of: (i) at ground floor level; a waiting area, 2 wc's (1 accessible), 1 plant room, 1 meeting room, 3 gynaecology examination rooms (with associated changing rooms), 1 utility room, a waste room, an early pregnancy assessment unit with dedicated entrance, 2 assessment rooms, reflection room, 1 wc, and an office/reception; (ii) at first floor; a waiting area, a check in room, a supplies store, 2 wc's (1 accessible), 4 colposcopy examination rooms and with associated changing and consultation areas, a utility and a waste room; (iii) at second floor; a meeting room, 2 staff changing rooms (1 accessible with shower and wc), a wc, a staff canteen, a photocopier room and 4 staff office rooms.*

*The proposed Colposcopy building will involve the loss of 10 existing parking spaces, at the south- eastern corner of the hospital site. 2 number accessible car parking spaces will be provided to the south of the proposed extension.*

*Planning permission is also sought for site drainage, a glazed link to the existing Colposcopy building, site landscaping works, and all other associated and ancillary works. Access is via the main hospital campus which is accessed from Dolphin's Barn Street."*

#### **ABP Reg. Ref. 308917-20 Former Player Wills Factory**

- 5.9 Directly to the south of the proposed development an application for Demolition of all buildings excluding the original fabric of the former Player Wills Factory, construction of 492 no. Build to Rent apartments, 240 no. Build to Rent shared accommodation along, creche and associated site works located at the Former Player Wills site and undeveloped Land in Ownership of Dublin City Council, South Circular Road, Dublin 8 was granted 15/04/2021. This permission is currently subject to a judicial review challenge.

#### **ABP Reg. Ref.307221-20 Former Bailey Gibson Factory**

- 5.10 Directly to the south of the proposed development an application for demolition of all structures, construction of 416 no. residential units (4 no. houses, 412 no. apartments) and associated site works located at the Former Bailey Gibson Site, 326-328 South Circular Road, Dublin 8 was granted 14/09/2020. This permission is currently subject to a judicial review challenge.

#### **Part 8 permission for the demolition of the remaining two original flat complex blocks (DCC. Reg. Ref 2475/18)**

- 5.11 We note the following proposed by DCC Housing Department under Planning and Development Regulations 2001 (as amended) - Part 8 and approved 11 Jun 2018 for the following:

*"Pursuant to the requirements of the above, notice is hereby given of the intention to amend the previously permitted development comprising 50 no. units (16 no. apartments, 24 no. 3 bedroom terraced houses and 10 no. 2 bedroom terraced units - Planning ref 2033/14) to allow for the construction of an additional 4 no. terraced residential units and associated works; amendments to the design of 12 no. previously permitted units; development of a temporary grass multisport pitch in addition to the*

*previously permitted park development (Phase A); demolition of 2 no. existing flat blocks to facilitate the future provision of a landmark park (Phase B) with full size multisport pitch and associated works at St. Teresa's Gardens, Donore Avenue, Dublin 8 as follows:*

*Additional residential units:*

*4 no. 3 bedroom terraced units - as an extension of the previously permitted 3 storey terrace. Total proposed residential development of 54 no. units (including the additional 4 no. units) comprising 16 no. apartments, 28 no. 3 bedroom terraced units and 10 no. 2 bedroom terraced units.*

*Amendments to 12 no. previously permitted residential units:*

*6 no. 2 bedroom 3 storey terrace units (type E1 and F1) to be amended to 6 no. 2 bedroom 3 storey terraced units (B1 to B6).*

*4 no. 2 bedroom 2 storey terrace units (type D1) to be amended to 4 no. 2 bedroom two storey terraced units (D1 to D4).*

*2 no. 3 bedroom 3 storey units (type A) to be amended to 2 no. 3 bedroom 3 storey units (C1 and C2).*

*Demolition of 2 no. four storey flat blocks comprising:*

*56 no. residential units (35 no. 1 bedroom units, 14 no. 2 bedroom units, 7 no. 3 bedroom units), a football club premises, boxing club premises/changing facility and a shop premises to facilitate the future development (Phase B) of an enlarged park and multisport playing pitch in accordance with the 2017 Development Framework for the SDRA 12 lands.*

*Development of a temporary grass multisport pitch and associated works (in addition to the previously approved park - Phase A)."*



## **6.0 PRE-APPLICATION CONSULTATIONS**

- 6.1 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 Planning Authority.
- 6.2 A series of pre-application meetings and consultations were undertaken with the Planning Department and other Departments of Dublin City Council throughout 2021 and 2022. The current scheme reflects amendments and improvements made following the comments made by the City Council at these meetings.
- 6.3 The main points raised during the course of the meetings with DCC can be identified as follows:
- Justification for the proposed scheme.
  - The need to consider the relationship with the extant permissions for developments within the surrounding area.
  - The need to consider the interaction of the proposed development with existing adjacent development, and the need to preserve the amenity, privacy and security of these properties.
  - The elevational treatment, massing and scale of the proposed development.
  - The need to consider the proposed heights, local streetscape impacts and visual impacts from the surrounding area.
  - The requirement for public open space.
  - Level of car parking provision.
  - Need to ensure landscape proposals are integrated with SuDs.
  - Access, permeability, and connectivity with surrounding areas and land uses.
- 6.4 The proposed development now submitted to An Bord Pleanála is considered to be in accordance with the proper planning and sustainable development of the area.

## 7.0 NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

7.1 The key provisions of national (including relevant Section 28 guidelines) and regional planning policy context relating to the proposed development are set out in the following sections. The policy and guidance documents of relevance to the proposed development are listed below:

- The National Planning Framework (2018)
- Eastern and Midlands Regional Assembly – Regional Spatial and Economic Strategies (2019)
- Housing for All – a new Housing Plan for Ireland
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual (2009)
- Sustainable Urban Housing: Design Standards for New Apartments (2020)
- Urban Development and Building Heights Guidelines 2018
- The Planning System and Flood Risk Management: Guidelines for Planning Authorities (November 2009)
- Design Manual for Urban Roads and Streets (2019)
- Transport Strategy for the Greater Dublin Area 2016 – 2035
- Draft Transport Strategy for the Greater Dublin Area 2022-2042
- Guidelines for Planning Authorities on Childcare Facilities (2001)

7.2 An evaluation of the consistency of the proposed development in the context of the relevant policies and objectives set out in the above-referenced documents is addressed in each section below.

### National Planning Framework 2018

7.3 The National Planning Framework (Ireland 2040 – Our Plan) was published in February 2018. The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of Ireland out to the year 2040. The plan will guide national, regional and local planning opportunities together with investment decisions for at least the next two decades.

7.4 The National Strategic Outcomes set out in the NPF are:

- Compact Growth.
- Enhanced Regional Accessibility.
- Strengthened Rural Economies and Communities.
- High-Quality International Connectivity.
- Sustainable Mobility.
- A Strong Economy, supported by Enterprise, Innovation and Skills.
- Enhanced Amenities and Heritage.
- Transition to a Low Carbon and Climate Resilient Society.
- Sustainable Management of Water, Waste and other Environmental Resources.
- Access to Quality Childcare, Education and Health Services.

7.5 The shared goal for Compact Growth 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."*

- 7.6 In relation to residential development the plan states:

*"A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites."*

- 7.7 In terms of strategy for Dublin, the NPF state:

*"Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city."*

*Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties."*

*Addressing infrastructural bottlenecks, improving citizens' quality of life and increasing housing supply in the right locations."*

- 7.8 A core objective of the NPF is achieving compact growth and the Framework targets a 'significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas.'
- 7.9 The NPF seeks to achieve 'better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport'.
- 7.10 National Policy Objective 2a sets out "a target that half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs".
- 7.11 Objective 3a sets a target to "deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements"
- 7.12 Objective 3b states "Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints."
- 7.13 National Policy Objective 4 aims to "ensure the creation of attractive, liveable, well designed, high urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."

- 7.14 National Policy Objective 5 states *“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.”*
- 7.15 National Policy Objective 6 seeks to *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”*
- 7.16 National Policy Objective 7 relates to applying a tailored approach to urban development, with a particular focus including Dublin, and encouraging population growth in strong employment and service centres of all sizes, supported by employment growth.
- 7.17 National Policy Objective 11 states: *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*
- 7.18 The NPF states that *“...In particular, general restriction on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general locations e.g. city/ town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.”*
- 7.19 National Policy Objective 13 states that: *“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”*
- 7.20 National Policy Objective 27 seeks to *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritizing walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.”*
- 7.21 The NPF outlines there is a projected total requirement to accommodate 550,000 additional households to 2040. National Policy Objective 33 seeks to *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*
- 7.22 Objective 35 of the National Planning Framework aims to: *“Increase residential density in settlements through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area of site- based regeneration and increased building heights.”*
- 7.23 The NPF also states that *“to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas.”*

## Consistency with NPF Objectives

- 7.24 The proposed development accords with the stated objectives of the NPF, in particular with the key objectives and principles of compact growth. The proposed scheme provides for the redevelopment of an under-utilised site in a central accessible location, and the NPF includes a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities.
- 7.25 In accordance with the objectives of the NPF, the proposed development ensures an efficient use of land, capitalising on the site's potential in an existing urban area adjacent to quality public transport. The site is well serviced by existing amenities and facilities, with accessibility to a variety of education, healthcare, sports and recreation, and social and cultural facilities and amenities.
- 7.26 In summary, the NPF shows broad support for a higher density residential development, which supports compact growth in a central location, particularly given that it is an under-utilised site with excellent public transport accessibility and availability. The proposed development is of a high architectural quality and makes efficient use of land on this brownfield site, consistent with the objectives of the NPF.

## Eastern and Midlands Regional Assembly – Regional Economic and Spatial Strategies (2019)

- 7.27 The Regional Spatial & Economic Strategy (RSES) was adopted by the Eastern & Midland Regional Assembly (EMRA) on 3<sup>rd</sup> of May 2019 and came into effect on the 28<sup>th</sup> of June 2019.
- 7.28 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.”*
- 7.29 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”*
- 7.30 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.
- 7.31 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 under-utilised 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.

### **Consistency with RSES**

- 7.32 The proposed redevelopment of the subject site for a higher density apartment scheme, located in Dublin 8, 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.
- 7.33 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 (including BusConnects). Thus, the proposed development accords with the RSES which seeks to ensure that the development of higher density schemes is coordinated with the delivery of key water infrastructure and public transport projects.

### **Housing for All, A New Housing Plan for Ireland (2021)**

- 7.34 'Housing for All, A New Housing Plan for Ireland' was launched in September 2021, with the goal of increasing housing supply up to 2030 (effectively replacing the previous strategy, 'Rebuilding Ireland'). Housing for All seeks to increase housing availability and affordability, and to create a sustainable housing system into the future.
- 7.35 The aim of Housing for All is that: *"Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life."*
- 7.36 The plan contains a range of measures to ensure the delivery of over 300,000 social, affordable, cost rental and private homes by 2030. These are backed by funding through the Exchequer, the Land Development Agency, and the Housing Finance Agency investment. The plan commits to over €20 billion in state investment in housing over the next five years. The aims of Housing for All are to be delivered on through four pathways:
- *"Pathway to supporting home ownership and increasing affordability*
  - *Pathway to eradicating homelessness, increasing social housing delivery and supporting social inclusion*
  - *Pathway to increasing new housing supply*
  - *Pathway to addressing vacancy and efficient use of existing housing stock"*
- 7.37 These pathways are underpinned by long-term strategic actions to address systemic challenges. It aims to deliver a housing system which has environmental, social and economic sustainability at its heart and meets the needs of all.

### **Consistency with Housing for All**

- 7.38 The proposed development is in line with the objectives of Housing for All, as it represents an increase in housing supply in the area including social housing. As part of the proposed development the existing vacant site is to be brought into full use for apartments, along with ancillary uses, further delivering on the aims of Housing for All.

- 7.39 The lack of housing supply in Ireland is a well-documented and ongoing issue. The proposed development incorporates the construction of 543 no. apartments, including social rented apartments, which will service the demand for housing in the area.

**Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)**

- 7.40 The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (SRDUA) assist planning authorities, developers, architects and designers in delivering quality residential development.
- 7.41 The 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 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 twelve criteria of the Urban Design Manual are addressed in the Architectural Design Statement prepared by MW Architects.
- 7.42 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.”*
- 7.43 The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 and that:
- “the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...”*
- 7.44 In respect of development within cities and larger towns, Paragraph 5.0 of the Guidelines states that it is ‘...Government policy to promote sustainable patterns of settlement, particularly higher residential densities in locations which are...served by public transport’.
- 7.45 In respect of general design guidance, Paragraph 5.1 of the Guidelines states that:
- “The objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.”*
- 7.46 Factors to be considered (Paragraph 5.2) include:
- *“acceptable building heights;*
  - *avoidance of overlooking and overshadowing; and*
  - *provision of adequate private and public open space, including landscaping where appropriate.”*

- 7.47 Paragraph 5.8 of the Guidelines states that “*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.*” Public transport corridors are defined as land “within 500 metres walking distance of a bus stop, or within 1km of a light rail stop.”
- 7.48 The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:
- *“make the most effective use of the site, having regard to the criteria outlined below;*
  - *make a positive contribution to its surroundings and take the best advantage of its location through the use of site topography, i.e. levels, views, context, landscape, design orientation (sunlight and daylight), to optimise sustainability;*
  - *have a sense of identity and place appropriate to the character of the existing small town or village and a logical hierarchy of places within the scheme working from streets to semi-private and private areas;*
  - *provide for effective connectivity, especially by pedestrians and cyclists so that over time, small towns and villages become especially amenable to circulation by walking and cycling rather than building up reliance on the car; and*
  - *include a design approach to public areas such as streets, plazas and open spaces that is guided by the best principles of passive surveillance to encourage a safe sense of place, discourage anti-social behaviour and facilitate effective community policing.”*

### **Consistency with SRDUA Guidelines**

- 7.49 Having regard to the above, the proposed development accords with the sequential approach to the development as the subject site is zoned Z14 within the Dublin City Development Plan 2022-2028 with the objective to “*to seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential would be the predominant uses.*” The proposed use, predominantly consisting of residential, is considered appropriate under the Z14 zoning objective.
- 7.50 The proposed development provides for a net density of c. 262 units per hectare. This accords with the above and has regard to the surrounding context and character of the area. The guidelines clearly state that increased densities should be provided on site within 500m of a bus stop and within 1km of a light rail stop. The subject site benefits from high levels of connectivity in the context of public transport, with excellent availability of Dublin Bus routes, and is a short walking distance to the Fatima Luas stop. New infrastructure is also proposed in close proximity to the site including BusConnects.
- 7.51 It is clear that it is national policy to promote increased densities in excess of 50 units per hectare on zoned lands adjacent to public transport corridors. To achieve this increased density in a sustainable manner requires increased building heights to make the most of the zoned residential lands. As such, in order to sustainably deliver increased densities for residential development within existing urban areas, increased heights must be considered in appropriate locations.
- 7.52 The proposed development conforms to the more detailed guidance within the Guidelines on layout, density, by making effective use of the site; making a positive



contribution to its surroundings; having a sense of identity and place; providing for effective connectivity; and principles of passive surveillance.

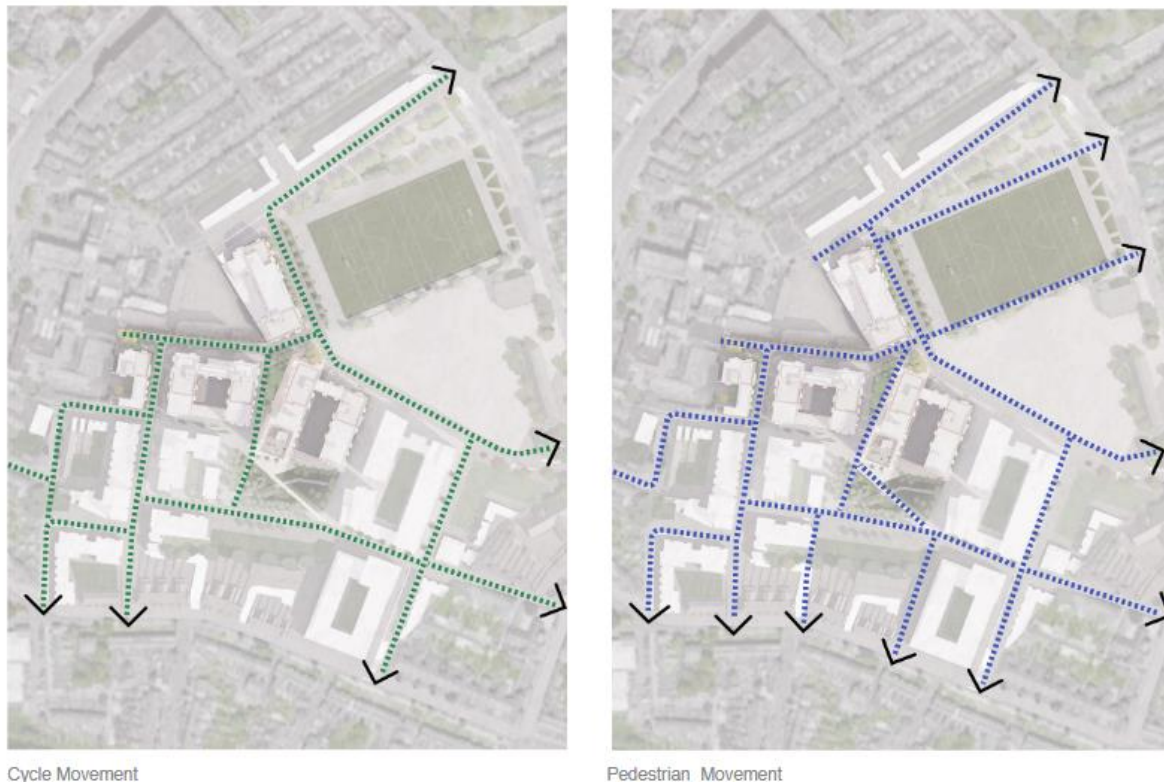
- 7.53 The proposed site layout is highly accessible for all users, with enhanced cycling and pedestrian permeability across the site, and introduces new streets, ultimately connecting South Circular Road with Donore Avenue, both within the proposed development and will integrate with other adjacent sites when the St Teresa's Gardens SDRA 11 is fully built out.
- 7.54 The site is ideally located to link the surrounding context and future developments with a predominantly pedestrian and bicycle strategy. Donore Project Park is at the heart of this strategy and will enjoy active use with a welcoming aesthetic, while linking the Players Park (to the south of DCC3) and the sports pitch to the north. The interconnectivity ensures that every public space within the design proposal is easily accessible.



**Figure 7.1: Circulation within application site. (Source: MW, 2022).**

- 7.55 The Donore Project street network and those of the adjoining extant permissions Hines Bailey Gibson 1 application Ref. ABP- 307221-20; and Hines Player Wills extant permission Ref. ABP-308917-20, will allow future residents of the Donore Project and existing residents of the surrounding areas to move freely through the SDRA11 lands. The resulting permeability will encourage maximum use of the

attractions and services offered across the Donore Project and St Teresa's Gardens SDRA 11 lands.



**Figure 7.2: Wider permeability strategy in terms of cycle (left) and pedestrian (right) movement. (Source: MW, 2022).**

### **Sustainable Urban Housing: Design Standards for New Apartments 2020 – Guidelines for Planning Authorities**

- 7.56 The Sustainable Urban Housing Design Standards for New Apartments were published by the Minister for Housing, Planning and Local Government and published in December 2020 under section 28 of the Act of 2000, as amended. The guidelines update previous guidance from 2015 in the '*context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines*'.
- 7.57 Any application which provides for new apartment development must have regard to the Apartment Guidelines 2020. The Guidelines set out a number of Specific Planning Policy Requirements (SPPR), which planning authorities must comply with in assessing planning applications for residential development.

#### Location

- 7.58 The Guidelines identify a number of locations suitable for apartment development, including 'Central and / or Accessible Urban Locations', 'Intermediate Urban locations' and 'Peripheral and/or Less Accessible Locations'. For Central and / or Accessible Urban Locations it states:

*“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.*

*The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.”*

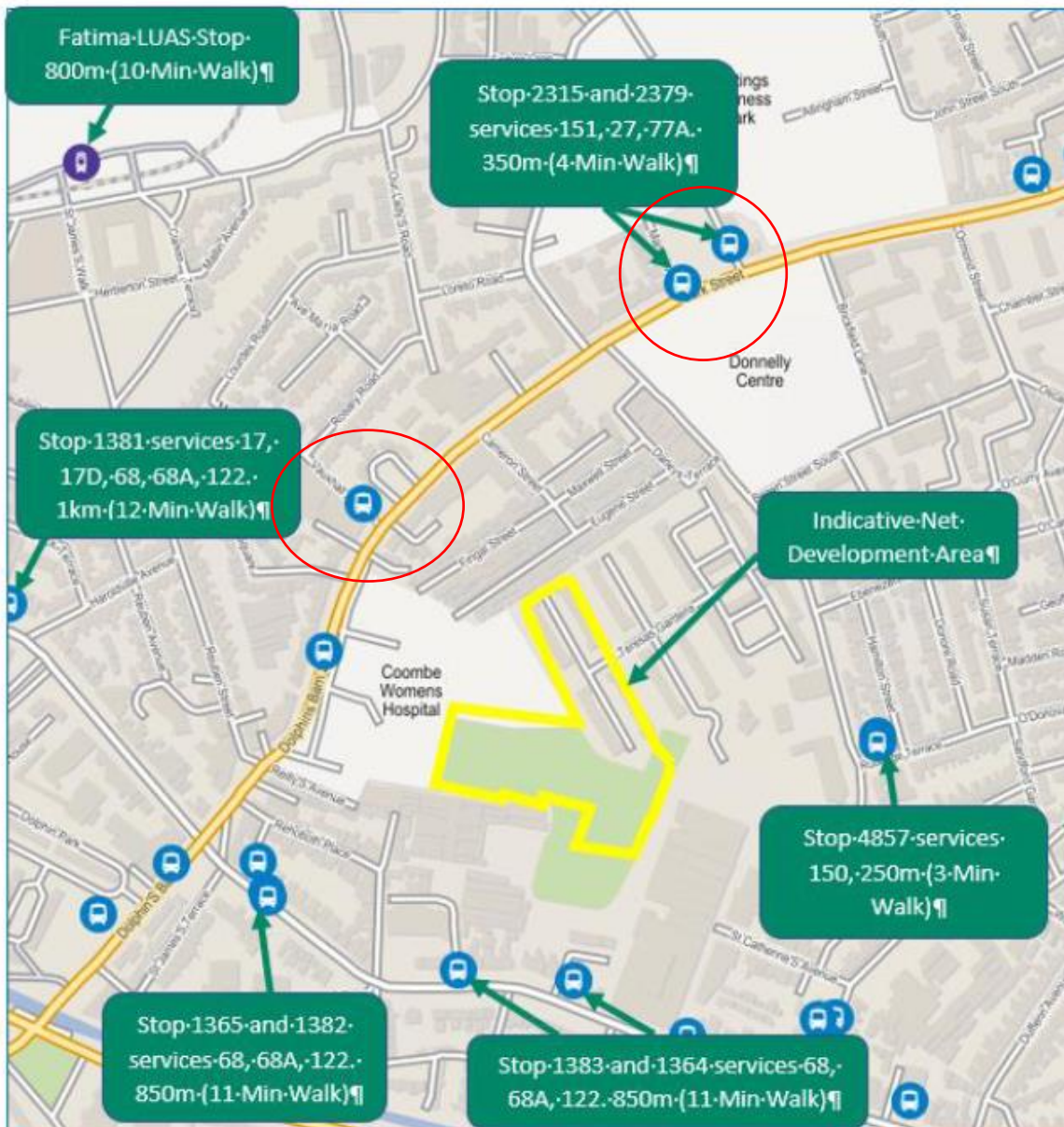
- 7.59 The subject site is situated within walking distance of existing high-quality bus and light rail services through Dublin City; these include high frequency bus services, which are a 4-minute walk located on Cork Street (Dublin Bus Services) and light rail services serving Fatima Luas stop (10-12 minute walk). The range of public transport services are displayed graphically in Figure 7.3 below.
- 7.60 The subject site therefore constitutes a ‘central and / or accessible urban location’ as defined within the 2020 Apartments Guidelines. In addition the nearest Luas stop is Fatima Luas Stop which is a 10-12 minute walk from the subject site.
- 7.61 The capacity of these services has been assessed as part of the Public Transport Capacity Assessment report carried out by AECOM. This report concludes that there is sufficient capacity on existing public transport services to cater for the level of forecast trip demand from the Donore development site.

**Table 2.1 Bus Services and Routing**

Route	Operator	Distance to Proposed Development Site	Route	Services Am and PM Peak Hours		
				Monday to Friday	Saturday	Sunday
17	Dublin Bus	1km (12 min walk)	Rialto -Crumlin -Nutgrove - UCD- Blackrock	1 service every 20 mins	1 service every 20 mins	1 service every 20 mins
27	Dublin Bus	350m (4 min walk)	Jobstown – Blessington Road – Cork Street- Malahide Road	1 service every 10 mins	1 service every 10 mins	1 service every 15 mins
56A	Dublin Bus	350m (4 min walk)	Tallaght – Ballymount Road – St. Luke’s Avenue- Ringsend road.	1 service every 1 hours and 15 mins	1 service every 1 hours and 15 mins	1 service every 1 hours and 15 mins
68	Dublin Bus	850m (11 min walk)	Hawkins Street – Dolphins Barn -Rialto – Bluebell- Clondalkin - Greenogue	1 service every 1 hour	1 service every 1 hour	1 service every 1 hours and 15 mins
77A	Dublin Bus	350m (4 min walk)	Citywest Road – Old Blessington Road – Cork Street – Ringsend Road	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
150	Dublin Bus	250m (3 min walk)	Hawkins Street – Patrick Street – Donore Avenue - Rossmore	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
151	Dublin Bus	350m (4 min walk)	Docklands (East Road)-Dolphins Barn – Parkwest - Foxborough	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
122	Dublin Bus	850m (11 min walk)	Drimnagh Road – Herberton Road – South Circular Road – Dorset Street – Ashington Park	1 service every 15 mins	1 service every 20 mins	1 service every 20 mins

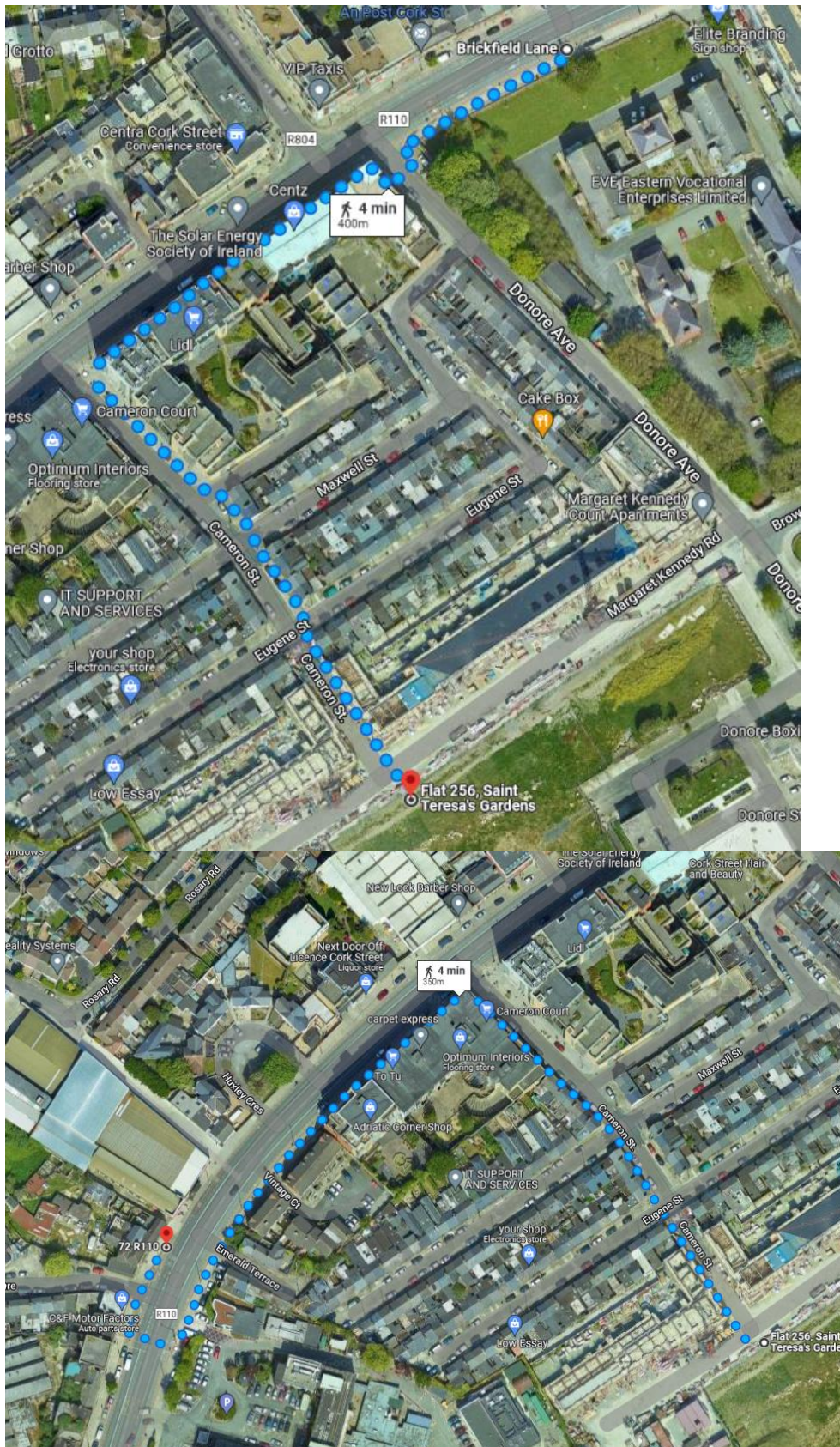
**Figure 7.3: Bus services and routing nearby. (Source: AECOM, 2022).**





**Figure 7.4a: Location of bus stops from within walking distance of proposed development with stops within 400m / 4 minute walk identified by red circle (Source: AECOM, 2022).**





**Figure 7.4b: Location of bus stops from within walking distance of proposed development with stops within 400m / 4 minute walk identified by red circle (Source: Google Maps, 2022).**

7.62 SPPR 1 of the Apartment Guidelines states that:

*“Apartments may include up to 50% one-bedroom or studio type units (within 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”.*

7.63 The proposed development provides for a mix of 225 no. 1-bedroom apartments (41.4%), 274 no. 2-bedroom apartments (50.5%), and 44 no. 3-bedroom apartments (8.1%). 52 no. (9.6%) of the units within the overall scheme comprise 2 bed 3 person units. The proposed development is therefore consistent with the apartment Guidelines in relation to unit mix.

7.64 SPPR 2 of the Guidelines states that:

*“For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:*

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10<sup>th</sup> residential unit to the 49<sup>th</sup>;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development;”*

7.65 This policy does not apply as it relates to residential mix on building refurbishment sites, or urban infill schemes on sites of up to 0.25 ha. The subject site has an area of c.3.26 ha and can be considered a large-scale urban development site, as reflected in the Dublin City Development Plan.

7.66 SPPR 3 of the guidelines sets out the minimum apartment floor areas. These are detailed as follows:

*“Minimum Apartment Floor Areas:*

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

7.67 Additionally, the Guidelines provide for a minimum floor area of 63 sq. m for 2-bedroom (3 person) apartments. The proposed apartments meet and where possible exceed the minimum floor areas as set out in the Guidelines, and this is detailed in the Housing Quality Assessment prepared by MW Architects. In Summary unit size range as follows:

- Studio apartments range in size from 39.5 – 40.8 sqm.
- 1 bedroom units’ range in size form 45.6 – 54.3 sqm.



- 2-bedroom apartment (3 persons) range in size from 67.6 to – 75.7 sqm.
- 2-bedroom apartment (4 persons) range in size from 73.8 - 81.9 - sqm; and
- 3-bedroom apartment (5 persons) range in size from 99.2 sqm – 108.8 sqm.

7.68 The Apartment Guidelines 2018 state under SPPR4 that:

*“it is a policy requirement that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e. on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design.”*

7.69 The proposed scheme provides for 45% no. dual / triple aspect units of the overall scheme. This is in excess of the minimum requirement of 33% as provided for under SPPR4 of the Apartment Guidelines 2020, which would apply to the subject site and proposed development given the site’s location adjacent to a high-quality public transport corridor. The subject site is situated within walking distance of existing high-quality bus (Dublin Bus No. 27 which operates every 10 minutes) and light rail services through Dublin City; these include high frequency bus services, which are within a 5-minute walk at Cork Street. The subject site therefore constitutes a ‘central and / or accessible urban location’ as defined within the 2020 Apartments Guidelines i.e. due to its proximity to ‘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’. Please see TTA prepared AECOM for full details.

7.70 The daylight and sunlight assessment report prepared by 3D Design Bureau, and which accompanying this application illustrates that the proposed residential units will achieve a good level of daylight generally in compliance with the recommendations of the BRE Guidelines. This is discussed further in section 9.114.

7.71 SPPR 5 of the Guidelines states that:

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

7.72 All ground floor apartments provide for a minimum of 2.7m floor to ceiling height in accordance with SPPR5. The floor to ceiling heights for all floors above the ground floor level have been designed to achieve greater internal floor to ceiling heights than the minimum of 2.4m.

7.73 SPPR 6 of the Guidelines states the following:

*“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, subject to overall design quality and compliance with building regulations”.*

7.74 The proposed development provides for fewer than 12 apartments to be served per floor per core, in line with the provisions of SPPR6. This is set out in the architectural drawings prepared by MW Architects.

## **Other Relevant Standards from the Apartment Guidelines**

### Living/Dining/Kitchen Area / Widths

- 7.75 The drawings and HQA prepared by MW Architects illustrate how the 543 no. units all meet or exceed the minimum living dining kitchen area requirements as per Appendix 1 of the 2020 Apartment Guidelines.

### Storage Space

- 7.76 The architectural drawings and Housing Quality Assessment prepared by MW Architects illustrate how the minimum storage area requirements are met for all of the units as per Appendix 1 of the 2020 Apartment Guidelines.

### Bedroom Floor Areas / Widths

- 7.77 The drawings and HQA prepared by MW Architects illustrate how the bedroom area requirements are met for all 543 no. units as per Appendix 1 of the 2020 Apartment Guidelines.

### Cycle Parking

- 7.78 The proposed development incorporates the provision of appropriate cycle parking facilities. As set out in the Schedule of Accommodation and drawings prepared by MW Architects, it is proposed to provide 906 no. cycle spaces for the proposed development. There are also an additional 138 no. bicycle spaces at surface level for visitors to the scheme.
- 7.79 While the proposed development does provide for the quantum of cycle spaces to serve the residents of the scheme as per the minimum requirement provided for in the Guidelines for 1 cycle storage space per bedroom for the 1-bed and 2-bed units, 1 space per studio unit, which equates to 905 no. spaces, it is slightly below the standard for visitor parking which is 1 visitor space per 2 units, which equates to a visitor requirement of 272 no. spaces.
- 7.80 However, as provided for in the guidelines, *“any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.”*. As noted above, and as set out in the TTA report prepared by AECOM, given the site’s highly accessible location which is proximate to a range of high quality public transport services, a large number of the visitors to the site are likely to arrive by public transport or on foot.
- 7.81 Bicycle stores will be clearly visible and located in convenient locations to encourage sustainable modes of transport: beside residential entrances; along active street frontages; from the communal courtyard in DCC6; or from podium car parking in DCC5. All residential bicycle parking is located within the building footprint (see Figure 7.5 below for locations of cycle parking).
- 7.82 Further details on the cycle parking provision are set out in the Transport & Traffic Assessment submitted with the application.

### Car Parking

- 7.83 The proposed development will provide for 94 no. car parking spaces to serve the proposed development which results in a car parking ratio of 0.175 spaces per unit.
- 7.84 The 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'.
- 7.85 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.*

- 7.86 With reference to the above locational criteria, the subject lands are located within c.350 m walking distance or 4 minutes of The Coombe Women & Infants University Hospital, within 5 minute walking distance of bus routes along Cork Street and 10-12 minute walking distance of the Fatima Luas station.
- 7.87 This level of parking provision is considered appropriate for the site and accords with the provisions of the Guidelines (para 4.19) that state:

*"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 underutilise, 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."*

- 7.88 Car and cycle parking:
- DCC1 – Total 22 no. Spaces including 2no. Accessible spaces
  - DCC3 – Total 37 no. Spaces: including 2no. Accessible spaces
  - DCC5 – Total 20no. Spaces: including 2no. Accessible spaces and 2 no. allocated to crèche
  - On street: 11no. Standard Spaces, 1no. Accessible Spaces and 3no. set down/delivery spaces





**Figure 7.5: Car and bicycle parking strategy (source: MW, 2022)**

- 7.89 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 94 car parking spaces is provided for the residential element of the scheme. We refer the Board to the Traffic and Transport Assessment prepared by AECOM for a justification of the parking provision for the proposed development. In addition, a comprehensive Mobility Management Plan prepared by AECOM is also included with the application

#### Private Amenity Space

- 7.90 Appendix 1 of the Guidelines set out the minimum private amenity space requirements for apartments. These are as follows:

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

- 7.91 All apartments have been provided with private amenity space in the form of balconies or terraces, which meet and where possible exceed the minimum requirements. The private amenity space requirement for the proposed development of 543 no units is 2,578 sq.m (225 x 5 sq.m + 274 x 6 sq.m + 44 x 9 sq.m). The proposed development provides for in total 3,439 sq.m. of private open space which is in excess of the

minimum requirement. Where apartments are located at ground level, considered landscaping provides defensive planting and privacy to residents. There is a very clear distinction between public open space and semi-public open space.

### Communal Amenity Space

7.92 The Guidelines state that all apartment development must provide a level of communal amenity space. The Guidelines require the following minimum floor areas for communal amenity space:

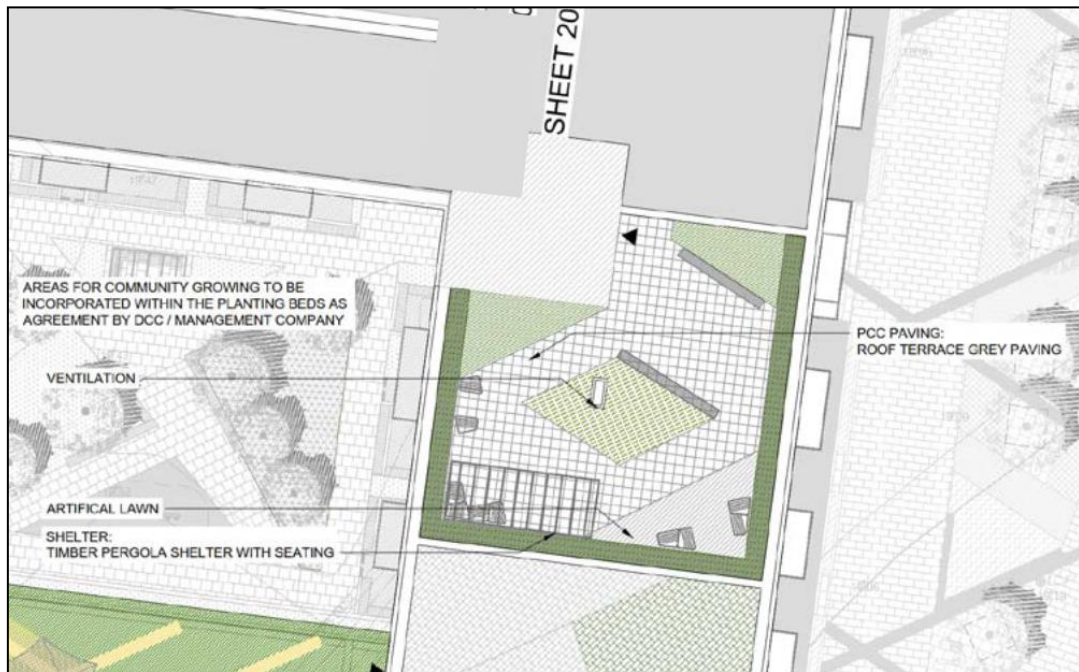
- *“Studio: 4 sq.m*
- *One Bedroom: 5 sq.m.*
- *Two Bedroom (3 Person): 6 sq.m.*
- *Two Bedroom (4 Person): 7 sq.m.”*

7.93 The communal amenity space requirement for the proposed development of 543 no units is 3,389 sq.m. The proposed scheme exceeds this requirement providing 4,417 sq.m of external communal amenity space. The communal open space is provided within ground floor courtyards, above car park podiums, and on roof terraces, as shown on the architectural and landscape drawings.

7.94 Communal amenity space is provided in the form of ground and podium level courtyards and roof terraces. Please see AECOM landscape plans which set out details of same.



**Figure 7.6: Example of podium amenity provided (Source: AECOM, 2022).**



**Figure 7.7: Example of roof terrace amenity provided (Source: AECOM, 2022).**

### Play Space

7.95 In relation to play areas, the Guidelines state:

*“The recreational needs of children must be considered as part of communal amenity space within apartment schemes. Experience in Ireland and elsewhere has shown that children will play everywhere. Therefore, as far as possible, their safety needs to be taken into consideration and protected throughout the entire site, particularly in terms of safe access to larger communal play spaces. Children’s play needs around the apartment building should be catered for:*

- *within the private open space associated with individual apartments;*
- *within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and*
- *within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.”*

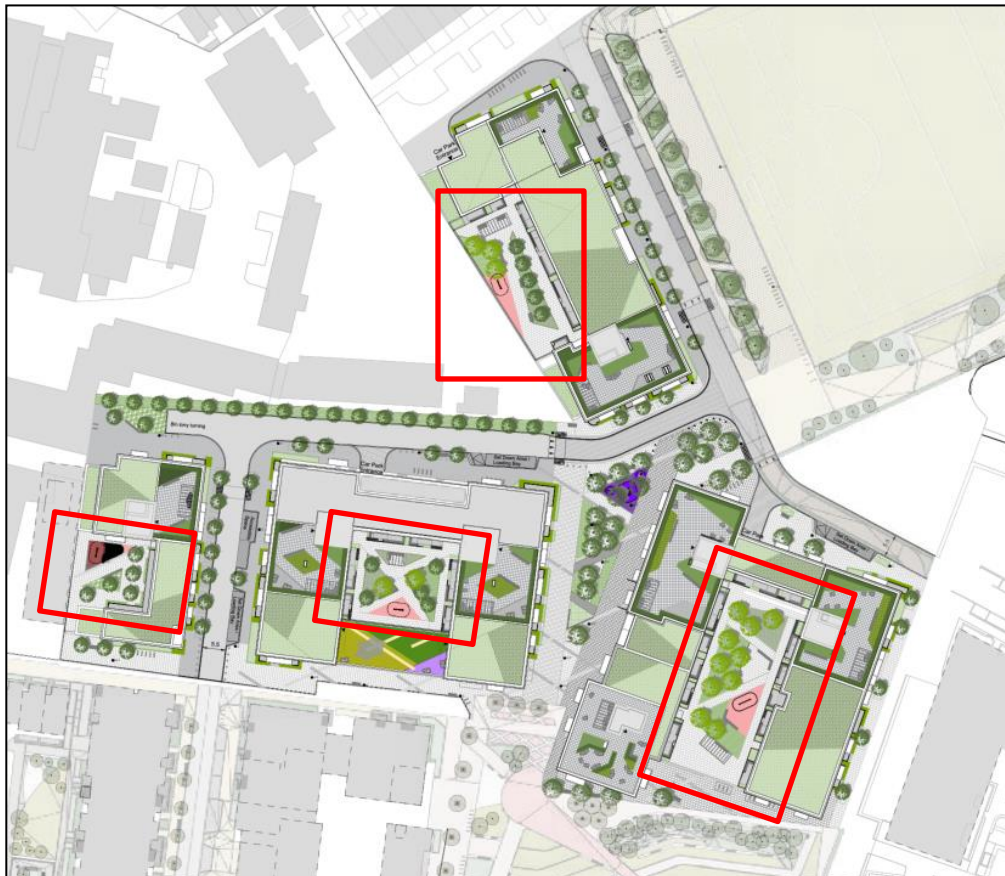
7.96 High quality landscaping proposals are proposed for each of the communal open space areas with a mixture of soft and hard surfaces, to provide opportunities for play and relaxation. All spaces are well overlooked and have good orientation. A detailed landscape plan and report has been prepared by AECOM Landscape and is included with the planning application.

7.97 Informal play areas are provided throughout the scheme within the main public open space areas and within the proposed communal courtyards and roof terraces catering for toddlers and young children. Play equipment within this area are well located so as to maintain a distance between boundary walls, which have increased heights to maintain safety, with sufficient buffers from the residential units to maintain residential



amenity. Please refer to the accompanying landscape drawings prepared by AECOM Landscape, together with their Landscape Design Report which sets out the play strategy for the subject site.

- 7.98 In addition, as per the guiding principles for St Teresa's Gardens SDRA 11 as set out in the Development Plan, play areas for older children, including the proposed municipal playing pitch, are to be provided on the adjoining sites within the SDRA. As set out within the JSA Community and Social Audit there are a large number of open spaces in the area, notably Weaver Park to the north east contains a range of play space for older children including a skatepark.



**Figure 7.8: Landscape Strategy with Play space identified (Source: AECOM, 2022).**

### **Urban Development and Building Heights Guidelines (2018)**

- 7.99 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.
- 7.100 The Guidelines promote an increase in building height in the right locations and set out certain criteria and requirements for developments of increased height.
- 7.101 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?*

- 7.102 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?*

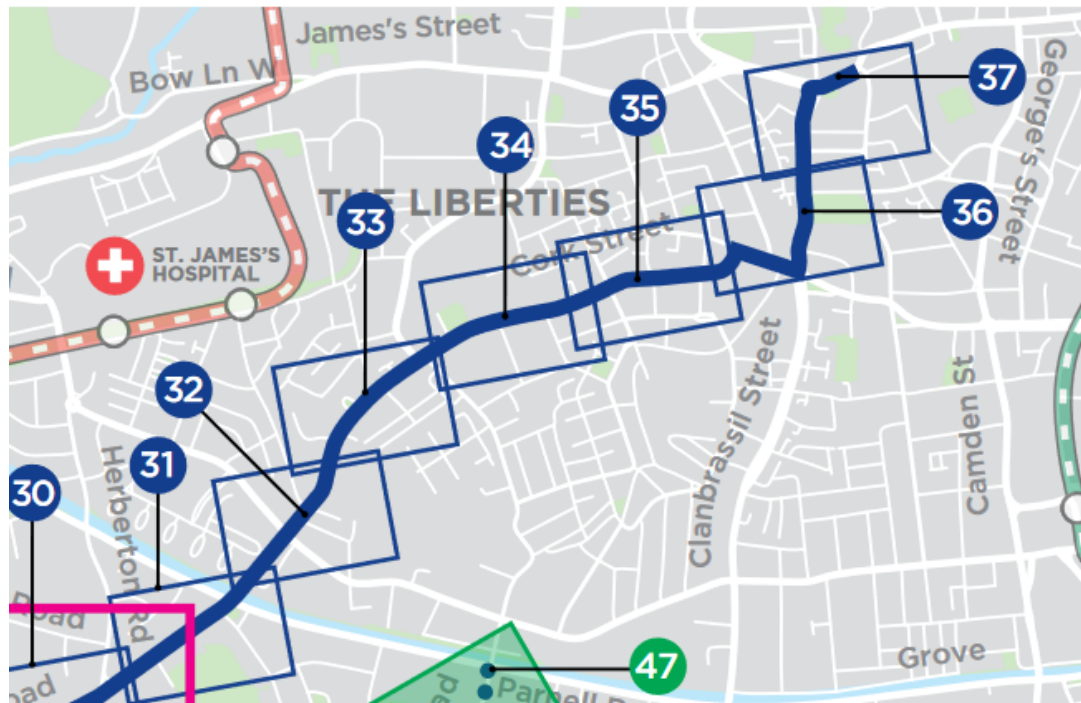
- 7.103 The Dublin City Development Plan 2022-2028, is fully consistent with the 2018 Building Height Guidelines, and, as set out below in the following section, the proposed development is in compliance with the height policies contained in this Development Plan.
- 7.104 The proposal supports the achievement of NPF objectives as the site is a brownfield site along a transport corridor within the urban extent of Dublin City. The proposal is in line with the requirements of the Dublin City Development Plan and has taken account of the criteria and principles set out in Chapter 2 of the Building Height Guideline (responded to in full below).
- 7.105 Paragraph 3.2 also states: *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.*
- 7.106 Responses to these criteria are set out below.

#### **At the scale of the relevant city/town**

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

- 7.107 As set out above, the subject site is situated within walking distance of existing high-quality bus and light rail services through Dublin City. This includes a number of bus routes within a 5-minute walk of the site. The site is within a 12-minute walking distance of Red Line Luas Stop at Fatima. It will also benefit from planned public transport upgrades, including Bus Connects which will serve Cork Street. There are 10 no. bus stops located within a 400m walking catchment of the site (Figure 7.4a/b). These bus stops are operated by Dublin Bus. As part of the BusConnects scheme the current bus network is to be revised and more frequent and efficient services are

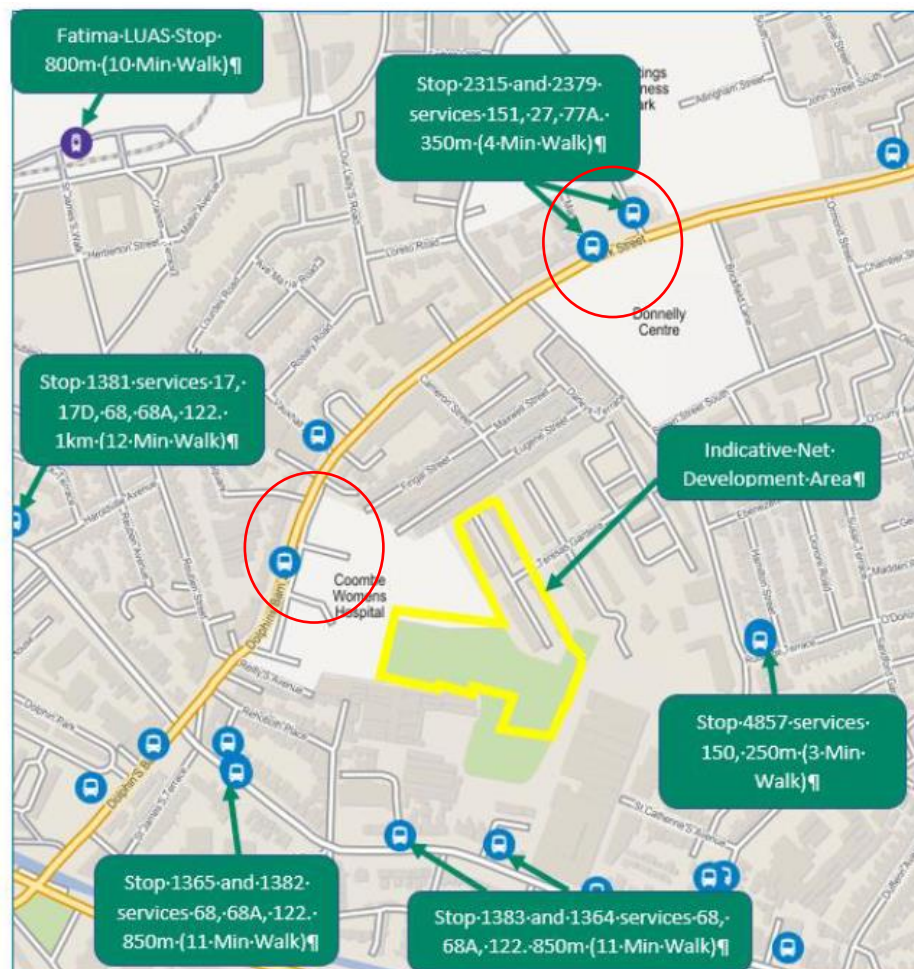
to be provided across the Dublin environs. The subject site is within 300m of Corridor 9 (Greenhills to City Centre) and 1.1km of corridor 11 (Kimmage to City Centre) of the Bus Connects proposals.



**Figure 7.9: Greenhills to City Centre Bus Corridor. (Source: NTA, 2022).**

- 7.108 Bus stops and services on South Circular Road, Hawkins Street and Cork Street were observed during the site visit which included bus observations on bus service no's. 122, 150, 151, 77A and 27 at a range of frequencies. The most frequent is the No. 27 which operates once every 10 minutes during peak hours.
- 7.109 AECOM have carried out an assessment of the capacity of bus services in the area concluding that contained within the Public Transport Capacity Assessment enclosed with this application, which concludes: *"that there is sufficient capacity on existing public transport services to cater for the level of forecast trip demand from the Donore development site."*





**Figure 7.10: prepared by AECOM with stops within 400m / 4 minute walk identified by red circle (Source: AECOM, 2020).**

Route	Operator	Distance to Proposed Development Site	Route	Services Am and PM Peak Hours		
				Monday to Friday	Saturday	Sunday
17	Dublin Bus	1km (12 min walk)	Rialto -Crumlin -Nutgrove - UCD- Blackrock	1 service every 20 mins	1 service every 20 mins	1 service every 20 mins
27	Dublin Bus	350m (4 min walk)	Jobstown – Blessington Road – Cork Street- Malahide Road	1 service every 10 mins	1 service every 10 mins	1 service every 15 mins
56A	Dublin Bus	350m (4 min walk)	Tallaght – Ballymount Road – St. Luke’s Avenue- Ringsend road.	1 service every 1 hours and 15 mins	1 service every 1 hours and 15 mins	1 service every 1 hours and 15 mins
68	Dublin Bus	850m (11 min walk)	Hawkins Street – Dolphins Barn -Rialto – Bluebell- Clondalkin - Greenogue	1 service every 1 hour	1 service every 1 hour	1 service every 1 hours and 15 mins
77A	Dublin Bus	350m (4 min walk)	Citywest Road – Old Blessington Road – Cork Street – Ringsend Road	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
150	Dublin Bus	250m (3 min walk)	Hawkins Street – Patrick Street – Donore Avenue - Rossmore	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
151	Dublin Bus	350m (4 min walk)	Docklands (East Road)- Dolphins Barn – Parkwest - Foxborough	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
122	Dublin Bus	850m (11 min walk)	Drimnagh Road – Herberton Road – South Circular Road – Dorset Street – Ashington Park	1 service every 15 mins	1 service every 20 mins	1 service every 20 mins

**Figure 7.11: extract from TTA Bus Service and Routing (Source: AECOM, 2022).**

7.110 As part of the BusConnects scheme the current bus network is to be revised and more frequent and efficient services are to be provided across the Dublin environs. The subject site is within 300m of Corridor 9 (Greenhills to City Centre) and 1.1km of corridor 11 (Kimmage to City Centre) of the bus connects proposals corridor 9 route length is approximately 12kms. The current bus journey time is up to 80 mins and the proposed bus connects bus journey time is 30-40 mins.

7.111 In addition, there are shared mobility services available including GoCar, Yuko car sharing, and Dublin Bikes. Further details are set out in the Traffic and Transport Assessment (TTA) and the Mobility Management Plan (MMP) prepared by AECOM.

*“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.”*

7.112 The site represents an under-utilised site in a central location with an excellent opportunity to provide quality mixed development scheme. The design for the scheme provides increased permeability and connectivity within this urban block through the introduction of pedestrian streets and open spaces as part of the proposed development. The proposed development is of high-quality design and comprises a palette of materials that promote its uniqueness and identity while responding to the existing context.

7.113 MW Architects provide the following vision for the development:

*“The proposed site offers a distinct opportunity to develop a vibrant, sustainable and compact residential neighbourhood. which is well connected and supports the social, economic, and cultural well-being of the Donore area. At the heart of this vision is the desire to create an inclusive and integrated community with high quality sustainable homes and supporting amenities, set in an attractive public realm with a network of links to enhance well-being and integration with the surrounding community.”*

7.114 A key aspect of this vision is ‘integrating’:

*“The Donore Project site is centrally located in Dublin City and within a long-established community. This offers the opportunity to connect, integrate and contribute to the vibrancy of the local community and beyond with new residential development providing homes into an established and expanding community.”*



**Figure 7.13: extract from MW Design Statement of scheme CGI's.**

7.115 In response to the public realm considerations above, the AECOM Landscape Design Statement states:

*“The design proposals include a clear hierarchy of proposed new pedestrian routes within the site. The interconnectivity ensures that every public space within the design proposals is easily accessible.*

*Appropriate connections have been included between private, semi-private and public spaces to ensure effective and efficient connectivity. Landscape design proposals for the pedestrian routes will take into account the following factors:*

- *Universal accessibility.*
- *Safety.*
- *Reduction of street clutter.*
- *Clear delineation of pedestrian routes.*
- *Creation of an aesthetically appealing pedestrian experience.”*





**Figure 7.14: extract from AECOM's landscape Design Statement (Source: AECOM, 2022).**

- 7.116 The proposed open spaces contribute positively to creating a distinctive character and urban legibility to the surrounding townscape. The proposed development integrates and enhances the character of the surrounding area and the subject site, as well as the public realm, opening up the site and enhancing pedestrian permeability. The proposed development incorporates appropriate mitigation/enhancement through its design and has been tested in closer and distance verified views.
- 7.117 A Townscape and Visual Impact Assessment prepared by AECOM as part of the enclosed EIAR, states in regard to visual effects:

*"The proposal will add a new and prominent building quarter and landmark north of the Grand Canal. It will provide structure and introduce a new urban quality to a current brownfield site.*

*Visual effects beyond approximately 500m and up to 1km will reduce quickly and visibility of the Proposed Development will concentrate on the upper sections of the buildings due to intervening screening vegetation and other existing built structures. The Proposed Development will still form a new focal point in available open views, particularly in views south from beyond the canal, but it will be one component and several in these views.*

*Long-distance views beyond 1km will be hard to achieve due to the buildings in the immediate surroundings quickly screen the Proposed Development from view. Vantage points are possible in elevated locations; however, the Proposed Development will be seen as a new part of the overall south Dublin city townscape and as an urban quarter with panoramic views."*

*"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."*

- 7.118 The proposed layout will result in significant positive impact on the wider public realm, and enhance the experience for residents and visitors in the area. The proposed layout seeks to enhance the streetscape, delivering a high-quality urban design and introducing permeability improvements across the site. Pedestrians and cyclists are given priority with provision of new streets within the site. The proposed development incorporates a variety of building heights and forms and responds to existing and proposed developments in the area.



**Figure 7.15: extract from AECOM's landscape Design Statement circulation strategy.**

**At the scale of the district / neighbourhood / street**

*“The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape;”*

- 7.119 The development aims to create a highly accessible neighbourhood, using different modes of sustainable transport. The proposed site, along with development of the adjacent SDRA 11 lands, will include a highly permeable network of streets that will focus on pedestrian and cycle accessibility. The plans on the right details how these different modes will sit in the context of the St. Teresa’s Gardens SDRA 11 lands.
- 7.120 It is submitted that the proposal will make a positive contribution to the area, as it will provide for a high-quality architectural development that responds to and respects existing development in the area.
- 7.121 The site is bound by Donore Avenue to the north-east, Margaret Kennedy Road to the north-west, The Coombe Women & Infants University Hospital to the west, the former Bailey Gibson factory buildings to the south-west, and the former Player Wills factory to the south-east. The Donore Project is nestled within a well-established urban community. The development vision is to enhance this connectivity and permeability with a network of new activated streets and public spaces to and from this community. Cycling and walking links will be provided which will support active and sustainable travel options.
- 7.122 The proposed development would have a distinctive quality and improve the public realm, making a positive contribution to the area and the urban character. The proposed height and scale of the development accords with urban design principles and provides for a quality street frontage at this location.





**Figure 7.16: extract from MW Design Statement (Source: MW, 2022).**

7.123 As set out in the AECOM Landscape Design Statement:

*“It is the Primary Pedestrian Space at the centre of the SDRA 11 Guiding Principles and it links the various open spaces and residences together. Passive surveillance is provided from DCC1DCC3 & DCC5 as well as Players Park. Donore Park is a place for resting, active and passive uses and informal play. It is the link between the physical, social and environmental influences of the residences and Players Park to the south and the GAA pitch to the north.*

*“The proposal avoids long, uninterrupted walls of building in the form of perimeter blocks or slab blocks with materials / building fabric well considered;”*

7.124 The site layout avoids long, uninterrupted walls of the building in the form of perimeter blocks, by providing 4 no. separate buildings, of varying form and heights to respect the surrounding character and a series of urban streets which enhance the legibility and permeability of this area of the city. The proposed development also seeks to respond to the immediate context, varying in scale and form across the proposed blocks.

7.125 As set out in the MW Design Statement:

*“The key concept of the facade design is for the material strategy and architectural expression to act as a conduit between the new development within the proposed SDRA 11 lands and the existing wider Dublin 8 community. This area is characterized*

*by a fine grid of small streets and the character of this area is almost entirely residential.*

*The architecture of the surrounding context includes the use of brick in both domestic and commercial buildings. Brick is also used to ornament and articulate the facade. This helps to introduce a sense of scale and depth into the elevation that defined and complimented the fenestration. This articulation gives human scale to the buildings that helps to achieve the sense of domesticity and a sense of place.*

*The future neighbouring developments surrounding the Donore project will be brought forward by Hines. Although these proposals lie outside of this application we have liaised closely with their design teams to ensure that materials are coordinated through the full extent of the SDRA lands. Both the Bailey Gibson site and the Players Wills site have been through the planning system and are primarily residential in nature with a material palette chosen to be sympathetic to the existing urban fabric described previously. These materials are described on the following page”*



**Figure 7.17: extract from MW Design Statement (Source: MW, 2022).**

*“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 “the Planning System and Flood Risk Management Guidelines for Planning Authorities 2009;”*

- 7.126 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. The landscape strategy creates a number of distinct public and communal spaces. Further details are set out in the Landscape Design Statement, including the proposed hard and soft landscaping. The proposed development is considered to be fully compliant with the provisions of “The Planning

System and Flood Risk Management Guidelines” (2009), and this is set out in the accompanying Site-Specific Flood Risk Assessment prepared by AECOM.

7.127 As set out in the Landscape Design Report prepared by AECOM:

*“The site plan has been developed with a well-proportioned central public open space in mind.*

*The varied neighbourhood orientations will create interest along the interfaces of the scheme and minimums widths have been considered in order to provide suitably proportioned spaces.*

*The proposals include the provision of the following:*

- Public realm;
- Public open space (including informal play);
- Semi-private/communal open space;
- Private balconies.

*The variety of spatial typologies provision will ensure that all aspects of life are catered for in order to meet the needs of the residents and create a new dynamic community”*



**Figure 7.18: extract from AECOM Landscape Design Statement (Source: AECOM, 2022).**



*“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 integrated in a cohesive manner.”*

- 7.128 The proposed development will improve the legibility of the area, which is predominantly brownfield at present. The proposed heights across the site are appropriately located and designed to provide a positive response to the site and surrounding context in respect of nearby existing and proposed building heights. The height varies for each block, and they are appropriately stepped particularly from the south and set back from neighbouring properties to ensure they can be integrated into the wider area in a cohesive manner.

As set out in MW Design

- 7.129 Statement:

*“The site is ideally located to link the surrounding context and future developments with a predominantly pedestrian and bicycle strategy. Donore Project Park is at the heart of this strategy and will enjoy active use with a welcoming aesthetic, while linking the Players Park (to the south of DCC3) and the sports pitch to the north.*

*The interconnectivity ensures that every public space within the design proposal is easily accessible.*

*A new urban grain within the site boundary provides vehicular routes at the edges, cementing the hierarchy of pedestrian movement and more sustainable connectivity.*

*Cars are brought into the parking podiums as quickly as possible upon entering the site. Resident courtyards are provided above the parking podiums.”*

- 7.130 The proposed site layout has been developed with consideration for adjacent SDRA lands and associated extant permissions at Hines Phase 1 Bailey Gibson permitted under application Ref. ABP-307221-20 and Hines Player Wills permitted under Ref. ABP-308917-20 (both subject to Judicial Review). We also note CWTC Multi Family ICAV have recently submitted a Strategic Housing Development Application for the development of 345 no. residential units that ranges in height from 2-7. Upon completion, the development of the St. Teresa's Gardens SDRA 11lands will provide an integrated network of buildings, streets and open spaces which in turn link to the adjoining neighbourhoods.



**Figure 7.19: extract from MW Design Statement (Source: MW, 2022).**

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

- 7.131 The proposed development comprises the regeneration of the existing under-utilised site in a highly accessible location. It presents an opportunity to deliver high quality new residential units, servicing housing demand. The proposed apartments complement existing residential uses in the area, providing an increase in housing types and choice, including social housing.
- 7.132 The development entails a wide range of unit types and sizes. The proposed percentage of oversized dwellings across the scheme is 51% \*. (274\* homes). This meets the standard as per the Sustainable Urban Housing: Design Standards for New Apartments 2020. The diagram adjacent illustrates the locations of oversized apartments on a typical floor level.
- 7.133 The scheme also comprises a mix of social and cost rental homes, all apartments are designed in line with the provisions of the Sustainable Urban Housing, Design Standards for New Apartments 2020.
- 7.134 The development contains a variety of 2-bedroom types, including 3 and 4-person. All 3 bed units are 5 person units.

_DCC1_Mix		
Apt. Size	No. of Type	Percentage
1b2p	33	30%
2b3p	7	6%
2b4p	60	54%
3b5p	11	10%
Grand total: 111	111	

_SiteWide_Mix_Cost Rental		
Apt. Size	No. of Type	Percentage
1b1p	36	9%
1b2p	124	32%
2b3p	46	12%
2b4p	158	41%
3b5p	25	6%
Grand total: 389	389	

_DCC3_Mix		
Apt. Size	No. of Type	Percentage
1b1p	13	5%
1b2p	124	50%
2b3p	13	5%
2b4p	78	32%
3b5p	19	8%
Grand total: 247	247	

_SiteWide_Mix_Social		
Apt. Size	No. of Type	Percentage
1b2p	65	42%
2b3p	6	4%
2b4p	64	42%
3b5p	19	12%
Grand total: 154	154	

_DCC5_Mix		
Apt. Size	No. of Type	Percentage
1b1p	9	7%
1b2p	32	24%
2b3p	19	14%
2b4p	58	44%
3b5p	14	11%
Grand total: 132	132	

_SiteWide_Mix		
Apt. Size	No. of Type	Percentage
1b1p	36	7%
1b2p	189	35%
2b3p	52	10%
2b4p	222	41%
3b5p	44	8%
Grand total: 543	543	

_DCC6_Mix		
Apt. Size	No. of Type	Percentage
1b1p	14	26%
2b3p	13	25%
2b4p	26	49%
Grand total: 53	53	

**Figure 7.20: extract from MW Unit typology Schedule (Source: MW, 2022).**

#### **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 minimise overshadowing and loss of light.”*

- 7.135 The proposed development has been carefully considered in terms of scale and massing. The Architectural Design Statement and Housing Quality Assessment accompanying this application set out how the proposed development will achieve a high standard of residential amenity, including access to daylight, and ventilation through the provision of dual aspect apartments. A full daylight and sunlight assessment of the proposed development has been carried out by 3D Design Bureau, and their detailed report accompanies this application.



## 7.136 As set out in the MW Statement:

*“In accordance with the Sustainable Urban Housing: Design Standards for New Apartments 2020 the minimum requirement for dual aspect is 33% due to the site central and accessible location. The proposed percentage of dual aspect (or triple aspect) across the scheme is 47%.*

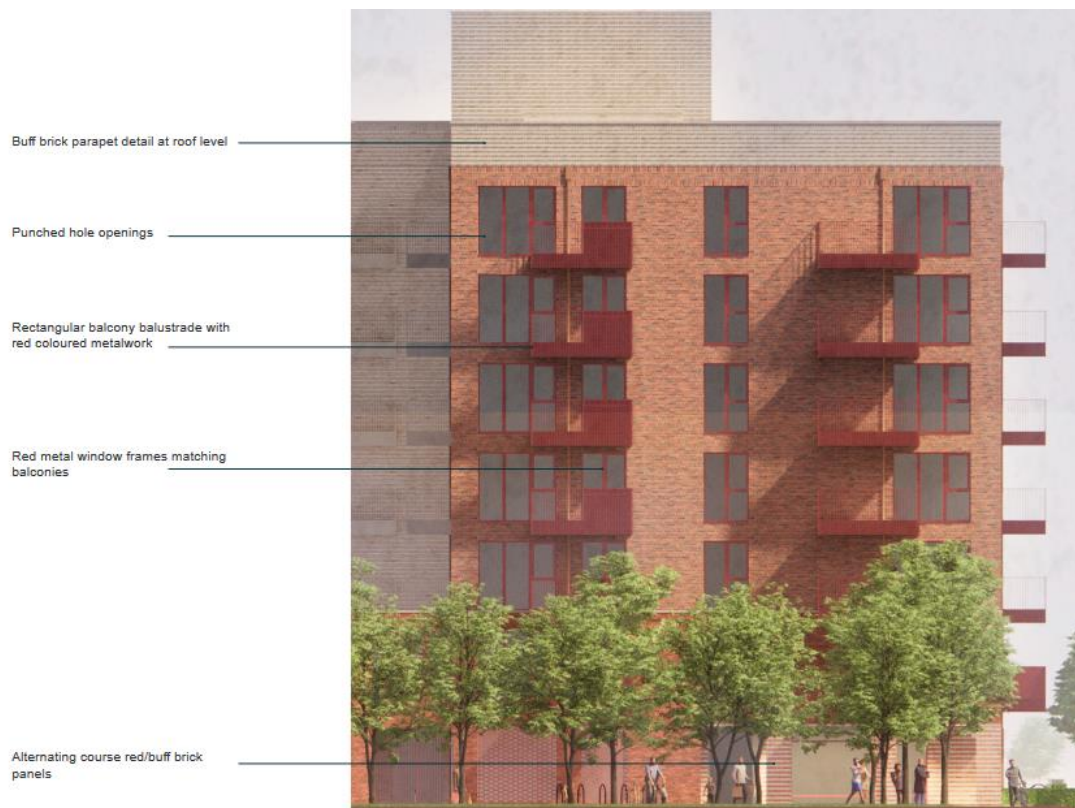
- *Dual aspect 244 dwellings*
- *Triple aspect 13 dwellings*
- *Single aspect 286 dwellings*

*The diagram adjacent illustrates the locations of dual aspect apartments on a typical floor level. Larger apartment sizes including 2 and 3 bedroom apartments are located on corners where dual aspect is achieved.*

*Where possible, living spaces are located on corners to take maximum advantage of the corner dual aspect and ensure higher daylight levels into the kitchen and living spaces.*

*A 2 bedroom apartment type is proposed that cross the plan at the ends of corridors which results in a dual aspect type with living and bedrooms on opposite sides of the building and reduces the lengths of internal corridors.”*

7.137 While there are no single aspect directly north facing units, there are a number of single aspect units. Where these occur, units face onto communal or public open space and a high quality of internal amenity is provided.



*“Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlines 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”.*

- 7.138 The application is accompanied by a Daylight and Sunlight Assessment Report prepared by 3D Design Bureau as set out in this report:

*“The BRE Guidelines (BRE 209), will be the primary reference document for this report as it is referenced in both Sustainable Urban Housing: Design Standards for New Apartments (2020) and Urban Development and Building Heights (2018). For daylight within proposed developments, a supplementary study will be carried out under the criteria of I.S. EN 17037, the Daylight and Sunlight Assessment states: As stated and explained in detail within this report, significant work has been done with the design team to ensure acceptable levels of compliance were achieved, in particular with regard to scheme performance. The compliance rate of circa 79%-80% for SDA, with the permitted schemes in play (circa 86%-87% without them in play), should be considered very favourable, and in excess of compliance rates in other schemes within the St. Teresa’s Gardens SDRA11, which have been permitted. Similarly the SE performance has also improved due to design changes and emphasis on dual and triple aspect units. The sun on ground measured on the open amenity areas, internal courtyards and the rooftops show a high level of compliance where future occupants can expect to enjoy good levels of daylight”*

### **Specific Assessments**

- 7.139 The Guidelines note that to support proposals at some or all of these scales, specific assessments may be required, and these may include:

*“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.”*

- 7.140 A pedestrian comfort analysis has been prepared by B-Fluid (as part of the EIAR Chapter 8 enclosed) which confirms that the proposed development is expected to provide an appropriate environment for pedestrians and occupants to carry out a wide variety of ‘sitting’, ‘standing’ and ‘walking’ activities. Suitable wind mitigation has been adopted where less than desirable windiness is expected within the development

*“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.”*

- 7.141 The EIAR accompanying this application sets out the impact the proposed development will have on bat/bird species. The site is generally an urban, brownfield site and no significant effects are likely to occur from the proposed development.

- 7.142 In regard to potential impact on birds the EIAR states:

*“The Proposed Development will change the local environment as new structures are to be erected. The buildings are comprised of solid materials consisting of a solid material on the exterior which includes sections of concrete and glass. These*

*buildings would be clearly visible to bird species and would not pose a significant collision risk. However, the presence of buildings on site and landscaping may provide additional nesting and foraging potential for garden bird species. As outlined in Appendix 5.2 "Results also suggest that the site is not a regular flightline path for such species like Brent Geese or other species of significant interest, checks on data bases (Irishbirding.com for example) suggest this part of the city has no history of foraging Geese or other significant species with the closest known sites being Crumlin farther to the south." The Proposed Development would not be seen to have a significant collision risk for bird strikes."*

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

- 7.143 The Mechanical and Electrical Report prepared by AECOM MEP includes a telecommunications section, which notes: *"A high-level study has been carried out on whether the proposed high-rise residential development will have any impact on Telecommunication channels. The initial finding assumed the proposed residential development will not impact any existing Telecommunication Channels."*

*"An assessment that the proposal maintains safe air navigation"*

- 7.144 The Irish Aviation Authority (IAA) have been notified as part of the application in accordance with the Dublin City Development Plan which states that the IAA must be notified in all cases where a proposed development exceeds 45m in height. (see Appendix 2 for letter from IAA) and will make submissions on the application during the application process. However, the site is not located in any approach paths, it is not expected that any issues to arise in respect to air navigation.

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

- 7.145 The application is accompanied by an Architectural Design Statement prepared by MW Architects. This sets out the urban design rational of the proposed development, including impacts on the historic built environment. The subject site is generally brownfield. There are no Protected Structures within the subject site, nor is it located within an Architectural Conservation Area Chapter 11 Archaeology & Cultural Heritage of the EIAR examines the potential impact of the development on the historic built environment context.

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

- 7.146 As noted above, the application is accompanied by an EIAR. This includes Chapter 5 on Biodiversity; and an AA Screening Report and Natura Impact Statement is submitted separately with the application. This AA Screening report prepared by Altamar found that

*"In a strict application of the precautionary principle, it has been concluded that significant effects on the integrity of South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA and North Bull Island SPA are likely from the proposed works in the absence of mitigation measures, primarily as a result of the indirect hydrological connection to the site via dust and contaminated surface water drainage to an existing public surface water drainage network which outfalls to*



*the Poddle Stream, which in turn outfalls to the River Liffey and the marine environment at Dublin Bay. For this reason, an NIS was carried out to assess whether the proposed project, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European Site. All other Natura 2000 sites were screened out at initial screening.*

*Following the implementation of the mitigation measures outlined, the construction and operation of the proposed development will not result in direct, indirect or in-combination effects which would have the potential to adversely affect the qualifying interests/special conservation interests of the European sites screened in for NIS with regard to the range, population densities or conservation status of the habitats and species for which these sites are designated (i.e. conservation objectives)."*

### **Greater Dublin Area Transport Strategy 2016-2035**

- 7.147 The Transport Strategy for the Greater Dublin Area 2016 – 2035 was prepared by the National Transport Authority (NTA) in 2016. It has been an essential component, along with investment programmes in other sectors, for the development of the Greater Dublin Area, which cover Dublin, Meath, Kildare and Wicklow. The Vision of this strategy is for Dublin to be a competitive, sustainable city-region with a good quality of life for all by 2030. The NTA has prepared an updated Draft Transport Strategy for the Greater Dublin Area 2022-2042. This strategy sets out the framework for investment in transport infrastructure and services over the next two decades to 2042. The Strategy includes the Busconnects Project referred to above.
- 7.148 The Strategy includes five overarching objectives to achieve the vision which are as follows:
- Build and strengthen communities
  - Improve economic competitiveness
  - Improve the build environment
  - Respect and sustain the natural environment
  - Reduce personal stress
- 7.149 The Strategy sets out measures to achieve the vision and objectives for the GDA. These include better integration of land use planning and transportation, consolidating growth in identified centres, providing more intensive development in designated town and district centres and control parking supply.
- 7.150 The Strategy builds on previous strategies and investment programmes, and for this reason several major infrastructure schemes that are included in the government's Transport 21 investment framework are included in all of the strategy options.
- 7.151 The proposed development provides for a high-density residential development and appropriate mix of uses adjacent to existing good quality public transport. Bus stops located within a 5-minute walk of the subject site are served by 7 no. regular Dublin Bus routes, and with an additional 8 no. Dublin Bus routes in a 10-minute walk.
- 7.152 The site is approx. minutes' walk from Fatima stop on the Luas Red Line. The BusConnects project will improve dedicated bus facilities and improve the Dublin Bus network. Proposed Core Bus Corridor no. 9 is proposed to run along Cork Street, to the north of the subject site. This will also deliver improved cycling facilities along Cork Street. Overall, the proposed density of development and the excellent availability of

public transport is considered to be consistent with the vision and objectives of the Transport Strategy for the GDA.

### **Draft Transport Strategy for the Greater Dublin Area 2022-2042**

- 7.153 This strategy has been prepared by the National Transport Authority and is due to come into effect in 2022. The overall aim for the Strategy is to provide sustainable, accessible and effective transport for the Greater Dublin Area (GDA) in response to the region's climate change requirements, need to serve urban and rural communities and support economic growth.
- 7.154 The Strategy includes five overarching strategic objectives to achieve the vision which are as follows:
- An Enhanced Natural and Built Environment
  - Connected Communities and Better Quality of Life
  - A Strong Sustainable Economy
  - An Inclusive Transport System
- 7.155 The Strategy sets out key challenges which have informed the Draft Strategy which include climate change, the Covid-19 pandemic, rebalancing road spaces to favour sustainable modes of transport, ensuring access for all and serving more rural communities. This strategy included the Busconnects project referred to above.

### **Design Manual for Urban Roads and Streets (DMURS)**

- 7.156 The Design Manual for Urban Roads and Streets set 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.
- 7.157 DMURS aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists, and public transport users. The Manual sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. Incorporating good planning and design practice and focus on the public realm, it also outlines practical design measures to encourage more sustainable travel patterns in urban areas.
- 7.158 The principal design guidance of DMURS has been considered in the design of this development. The Transport & Traffic Assessment prepared by AECOM provides further detail in respect of consistency of the proposed development with DMURS.
- 7.159 AECOM traffic consultants conclude that The design of the proposed development complies with recommendations of DMURS as it includes proposals for buildings and active uses fronting on to streets and the provision of new streets within the development creating a pedestrian and cycle friendly urban environment. Pedestrian and cyclist permeability throughout the site shall be accommodated through proposed pedestrian and cyclist entrances.
- 7.160 The proposed new access and junction from Margaret Kennedy Road accords with DMURS and ensures that unobstructed sightlines of 45m are achievable in both directions along Margaret Kennedy Road.

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

- 7.161 The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 no. criteria are assessed in the Architectural Design Statement prepared by MW Architects.

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

- 7.162 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.
- 7.163 In order to comply with these Guidelines a Site-Specific Flood Risk Assessment (SFRA) has been prepared AECOM, which demonstrates no risk of flooding to the proposed development, as the site is classified as being located within Flood Zone C. As part of the SFRA, the site was assessed for tidal/coastal flooding, pluvial, fluvial, groundwater and infrastructure flooding sources and the SFRA confirms that “*any associated risk is deemed to be within acceptable limits.*”

**Guidelines for Planning Authorities on Childcare Facilities (2001)**

- 7.164 The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the Pre-Planning discussions.

Block DCC5 provides for a creche of 664 sq.m, plus a dedicated outdoor play area of 225 sq.m., which could accommodate c. 130 childcare spaces, based on a standard level of provision of 5m<sup>2</sup> per child place. Based on the guidance set out above, which provides for the discounting studios and one bed units, the development comprises of 318 no. two and three bed units. This would generate demand for c. 85 no. childcare spaces. It is considered the proposed childcare facility is sufficiently sized to meet the additional demand for childcare facilities generated by the development, in addition to catering for demand arising from existing residents in the area, which are already catered for by the other facilities in close proximity to the subject site, as outlined above. Further details are set out in the Community and Social Audit prepared by John Spain Associates.



## 8.0 LOCAL PLANNING POLICY CONTEXT

- 8.1 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 2022-2028. The following section sets out and assesses the proposed development in relation to policies, objectives and standards of the Dublin City Development Plan (referred within to as the 'Development Plan'). An assessment against the 2016-2022 Development Plan is included in Appendix 1.
- 8.2 The DCC Development Plan 2022-2028 was adopted by the Council on 12 November 2022 and will come into effect on 14 December 2022. As the text and maps of the adopted Plan have not been published as of the date of lodgement of this application, the proposed is understood to be the final wording as detailed in the draft plan and proposed material amendments as agreed by the Council on 12 November 2022. An Bord Pleanála will of course assess the scheme against the published plan. We have been provided with a copy of the finalised Material Alterations as agreed by the Council to inform this Planning Report.
- 8.3 Using the same formatting as set out in the Material Alterations to the Draft Plan, Amendments to the Draft Plan are shown by way of bold green and underlined text **{Amendment}**, while deletions are shown in bold red text with strike through **(deletion)**.

### Core Strategy

- 8.4 As set out within Chapter 2 by 2028:
- "the city must accommodate between ~~(21,350 – 31,450)~~ **{20,120 – 31,520}** additional people, up to an overall population target of between 625,750 and 640,000 people by 2028.*
- 8.5 In regard to SDRA's the Plan states:
- "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 dwellings on approximately 358 hectares. (Table 13-1 in Chapter 13 shows a breakdown of these figures by individual SDRA).}**"*
- In regard to SDRA 11 the proposed residential yield is . c.1500 housing units.



*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.”*

8.10 The site is currently vacant following the demolition of all bar two of the original St. Teresa’s Gardens flat complex blocks several years previously. The lands are strategically located and have the potential to accommodate development at a sustainable density, while also delivering a mix of community and commercial uses. This proposal sets out a comprehensive approach to the redevelopment of the lands, noting and integration with other extant permissions and recently constructed houses.

8.11 These lands are strategically located within the built-up area of the city and are in the ownership of DCC. Development of these lands will contribute to economic growth and service much needed housing demand over the short to medium term. The proposed development accords with the primary purpose of the Z14 SDRA zoning, providing a residential development and helping to deliver on the objectives of the SDRA. The proposal regards the Guiding Principles of the SDRA carefully, a full response to which is set out within this Section.

8.12 Permissible uses within Z14 include:

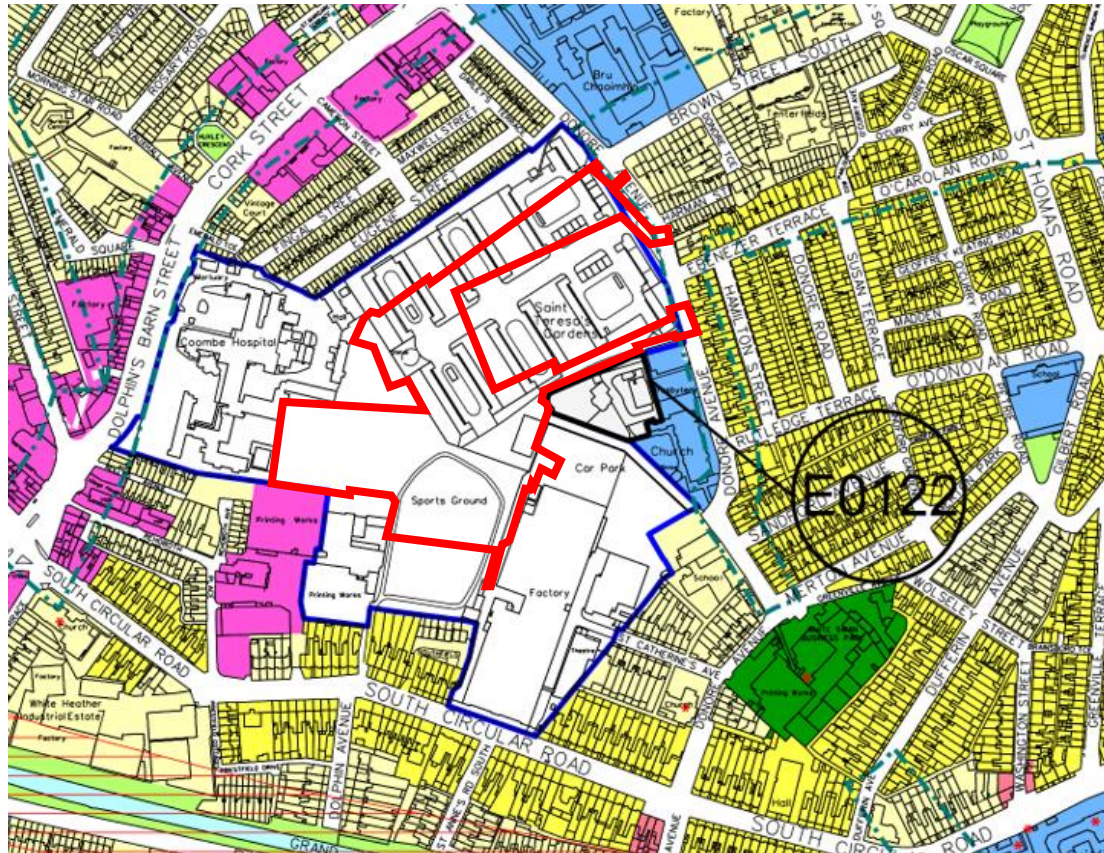
*“Assisted living/retirement home, beauty/ grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, **{Build To Rent residential,}** café/ tearoom, childcare facility, community facility, conference centre, craft centre/ craft shop, **cultural/recreational building 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.”*

8.13 Uses open for consideration include:

*“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.”*

8.14 As identified above the proposed uses are considered permissible within the Development Plan.





Zone Z14 Strategic Development and Regeneration Areas (SDRAs) \_ \_ \_ \_

**Figure 8.1: Land Use Zoning – Development Plan 2022-2028 (as amended by Material Alterations).**

### Chapter 3: Climate Action

#### ***“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.”*

- 8.15 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, the layout of the development to encourage sustainable modes of transport etc. as outlined in the Architectural Design Statement accompanying this application, prepared by MW.

- 8.16 As set out in Energy and Sustainability Statement prepared by AECOM:

*“The design will be heavily influenced by the sustainability principles of reduce, reuse, renewables and continual improvement (renewal) of the approach. The energy design will also be heavily influenced by Part L of the Building Regulations - Conservation of Fuel and Energy (Dwellings) 2021 and Part L of the Building Regulations – Conservation of Fuel and Energy (Buildings other than Dwellings) 2021.*

*“Passive energy reductions will be maximised through the specification of a high performing building fabric. Active energy reductions include the provision of a high efficiency air to water heat pump systems for space heating & domestic hot water, provision of mechanical heat recovery ventilation, specification of high efficiency lighting & controls and other discrete energy measures.”*

*“Embodied carbon will be a key consideration in the design. Materials of low embodied carbon, including recycled materials, will be preferred. Where possible locally sourced materials will be used to reduce the embodied carbon associated with transport.*

*“A number of sustainable urban drainage systems (SuDS) are to be used to effectively intercept and treat water leaving the site including green roof and permeable paving at roof level, as well as swales, bio-retention, tree pits and porous asphalt at ground level. The green roof will provide matters that will allow local birds and insects to thrive. Native planting will be used to integrate with the local habitat.”*

**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.”*

- 8.17 An Energy and Sustainability Statement has been prepared explain the design basis and approach of the proposed development including passive energy reductions, compliance with Part L, renewable energy strategy, and building design principles to achieve energy efficiency. Further, the site benefits from local transport links including bus & cycle lanes which will encourage sustainable transport to and from the development. A number of sustainable urban drainage systems (SuDS) are to be used to effectively intercept and treat water leaving the site including green roof and permeable paving at roof level, as well as swales, bio-retention, tree pits and porous asphalt at ground level.

**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”*

- 8.18 The proposed development will contribute to achieving sustainable settlement patterns by delivering residential units within an urban centre which will minimise transport requirements of 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.}”**

- 8.19 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 retro-fitting 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.”*

- 8.20 The proposed development will contribute to achieving sustainable settlement patterns by delivering residential units within an urban centre which will minimise transport requirements and therefore energy usage of future residents.
- 8.21 As set out in the AECOM Energy and Sustainability report:

*“Building energy efficiency and sustainability involves all designers and stakeholders from the start of the design process. The most successful sustainable sites are those which keep energy efficiency and sustainability at the core of project from design through to construction.*

*The 4 main principles to achieve energy efficient buildings are:*

- **Reduce:** Reduce energy consumption by passive and active means, for example improving building fabric and utilising low energy equipment.
- **Reuse:** Reuse energy & materials where possible by recovering waste energy where possible.
- **Renewables:** Utilise renewable technologies to offset energy from fossil fuel technologies.
- **Rethink:** Constantly rethink and refine the energy & sustainability strategy and approach.

*The potential strategies outlined in this report are based around these principles.*

*As noted above the development will be designed to meet Part L of the Building Regulations – Conservation of Fuel and Energy (Buildings other than Dwellings) 2021 incorporating Nearly Zero Energy Building (NZEB) standards.”*

**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.”*

- 8.22 The Energy and Sustainability Report prepared by AECOM sets out a response to A-H above including passive energy reduction, sustainable transport infrastructure, design efficiency, renewable energy, embodied energy and future use of district heating. Please also see Construction and Demolition Waste Management Plan prepared by AECOM in regard to generation of waste and measures employed to reduce this.
- 8.23 As set out above, the application is supported by a number of reports demonstrating the sustainability of the development, and compliance with the relevant NZEB standards.
- 8.24 No demolition of buildings is proposed as part of the project. Please see Building Lifecycle Report prepared by MW and Outline Construction Management Plan prepared by Enviroguide for further information on use of materials in building and during construction.
- 8.25 Please see the Energy & Sustainability Report, Resource and Waste Management Plan & Operational Waste Management Plan which have been prepared by AECOM, and accompany this application

**“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.”*

- 8.26 The proposed development includes various SuDS features outlined in Policy CA8 including a mix of extensive and intensive green roof; permeable paving on roof terrace; swales; tree pits; porous asphalt; bio-retention / rain gardens and landscaped areas that will provide habitats for biodiversity. Green infrastructure is set out within the Landscape Design Statement and the Infrastructure Report both prepared by AECOM. A Site Specific Flood Risk Assessment is enclosed with the application. As outlined in the AECOM Energy and Sustainability the proposal entails a range of measures to adapt to climate change.

**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”*

- 8.27 The proposed development includes 543 no. residential units. A Climate Action Energy Statement has been prepared by AECOM and is submitted with this 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”*

- 8.28 A Resource and Waste Management Plan & Operational Waste Management Plan has been prepared by AECOM and accompanies this 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 and best practice guidance as required. 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”*

- 8.29 The proposed development includes the provision of 50% of standard spaces with be equipped with EV 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.”*

**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”*

- 8.30 The proposed development includes both green and grey adaption measures to enhance flood and water resource resilience in the development. A Site Specific Flood Risk Assessment of the subject site has been carried out by AECOM and is submitted with this application.

**Policy CA28 – Climate Action and Green Infrastructure**

*“To protect, connect and expand the city’s Green Infrastructure while optimising the climate change adaptation and mitigation services it provides”*

Shape and Structure of the City

- 8.31 Policy SC1 of the Development 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.”*

- 8.32 The proposed development will provide for a significant quantum of compact urban growth, at a site identified as a strategic regeneration area. The site benefits from access to existing and proposed sustainable transport links, and the proposed development will assist in the full utilisation of those links. The proposed development will assist in the comprehensive regeneration of the SDRA and this part of the inner city and provide for much needed housing.

- 8.33 Policy SC10 of the Development Plan states:



*“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.”*

- 8.34 The proposed development is of a sustainable density and is higher than those of the neighbouring communities adjacent to the site. The proposed development incorporates an increased residential density relative to that of the existing 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. The proposed development exceeds this threshold, in order to deliver on the objective to construct more cost rental and social homes at sustainable densities. 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 MW Architects accompanying this application.

- 8.35 Policy SC11 of the Development 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.”*

- 8.36 The proposed development represents a comprehensive regeneration of a brownfield site, in close proximity to existing and proposed public transport and cycling infrastructure. The proposed development will enhance the urban form of the area, by providing for much needed housing, along with open space and ancillary facilities. The proposed development has been designed in a sensitive way, with varying heights which respond to the existing and emerging character of the SDRA. The site benefits from existing connections to community infrastructure, and as part of the overall proposal for the SDRA, community uses are proposed which will further enhance residential amenity in the area. 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 Development Plan.

- 8.37 Policy SC12 of the Development 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.”*

- 8.38 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 houses to provide a significant level of variety in the housing stock of the area. The proposed development 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.”*

- 8.39 The proposed development includes a range of SuDS measures such as green roofs, permeable paving, swales and bio retention / rain gardens; and green infrastructure such as planting and landscaped spaces. Further details on how the development incorporates green infrastructure is set out in the Landscape Design Statement. Permeability is provided through landscaped areas for pedestrians and cyclists.
- 8.40 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 including pollinator friendly planting. 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 Infrastructure Report prepared by AECOM.
- 8.41 The proposed development is considered compliant with the relevant green infrastructure policies outlined above.

***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”*

- 8.42 Please see Section 7.0 which sets out a detailed response to the Urban Development and Building Height Guidelines.
- 8.43 Policy SC16 of the Development 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.”*

- 8.44 The proposed development is located within an identified Strategic Development and Regeneration Area (SDRA 11) and is therefore considered suitable for increased building heights in compliance with the Development Plan. 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.
- 8.45 The proposed density has regard to the surrounding context and character of the area. The subject site benefits from high levels of connectivity in the context of public transport, with Dublin Bus and a short walking distance (4 minutes) to the Dublin Bus stops on Cork Street, and new infrastructure is also proposed in close proximity to the site including BusConnects. Proposed pedestrian and cyclist linkages to adjacent sites will result in a significant improvement on permeability in the area enabling future residents to access public transport and nearby amenities.
- 8.46 Overall, the scheme will provide for high quality apartments, that will successfully integrate with the character of the surrounding area, further specific information is contained within MW's HQA including a large number of oversized and dual / triple aspect units.
- 8.47 The development accords with the above policies in relation to the shape and structure of the City. A Townscape and Visual Impact Assessment (TVIA) is included as Chapter 10 of the EIAR submitted with the application, prepared by AECOM. 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 careful consideration has been taken in limiting the effect of the proposed development on important views and view corridors.
- 8.48 The assessments show that the proposed development is of high-quality design and comprises a palette of materials that promote its uniqueness and identity. Chapter 10 of the EIAR 'Townscape and visual impacts' concludes: *"The proposal will add a new and prominent building quarter and landmark north of the Grand Canal. It will provide structure and introduce a new urban quality to a current brownfield site.*

*Visual effects beyond approximately 500m and up to 1km will reduce quickly and visibility of the Proposed Development will concentrate on the upper sections of the buildings due to intervening screening vegetation and other existing built structures. The Proposed Development will still form a new focal point in available open views, particularly in views south from beyond the canal, but it will be one component and several in these views.*

*Long-distance views beyond 1km will be hard to achieve due to the buildings in the immediate surroundings quickly screen the Proposed Development from view. Vantage points are possible in elevated locations; however, the Proposed Development will be seen as a new part of the overall south Dublin city townscape and as an urban quarter with panoramic views. ."*

- 8.49 Policy SC17 of the Development Plan states:



*“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 cranes); 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.”*

- 8.50 The proposed development incorporates increased height in a sensitive way, in an identified regeneration area. The proposed development is of a high-quality architectural design and incorporates a variety of building heights and varied massing to provide visual interest. The proposed development 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. The existing site benefits from access to public transport and cycling links, and the proposed development will contribute to the continued utilisation of sustainable transport methods.
- 8.51 A Masterplan has been prepared by MW and is enclosed within the Architectural Design Statement.
- 8.52 The Mechanical and Electrical Report prepared by AECOM outlines that the proposed development will not impact safe air navigation.
- 8.53 The proposed development incorporates a range of sustainability measures such as energy efficiency, SuDS, renewable energy and other technologies as set out in the AECOM Energy and Sustainability Statement, and it is envisaged that the proposed development will facilitate a sustainable community.
- 8.54 The proposed development has been designed with regard to existing view corridors, along with the provisions of Appendix 3 of the Development Plan, please see above for conclusions to the Townscape and Visual Impact Assessment carried out as part of the EIAR.
- 8.55 In regard to SDRAs, Appendix 3 of the Development Plan states:

*“A number of Strategic Development Regeneration Areas have been identified in the city. These areas are to be the focus of compact growth over the plan period with the objective to facilitate ongoing intensification, infill and compaction. A series of guiding principles has been set out for each SDRA (Chapter 13) which promote appropriate heights and local landmarks depending on the SDRA location and context. Development proposals that align with these guiding principles will be supported. 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."*

- 8.56 Compliance with the criteria within Table 3 have been set out below within this Planning Report.

***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."*

- 8.57 The proposed development promotes healthy placemaking by making active transport a safe, attractive and convenient mode of transport for residents, users, and visitors of the proposed development. This is achieved by prioritising pedestrian and cyclist permeability in the design of the development, public lighting and through the use of active and passive surveillance. Please see MW Design Statement and AECOM Landscape 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.

***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)"*

- 8.58 The proposed development 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 7.0 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."*

- 8.59 An Architectural Design Statement has been prepared by MW and is submitted with this application.

Chapter 5: Quality Housing and Sustainable Neighbourhoods

***Policy 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.”*

- 8.60 The proposed development has been designed with due regard to the relevant local, regional, and national planning policies and guidelines, as set out in Section 7.0 above.

**“Policy QHSN2 – National Guidelines**

*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.}”*

- 8.61 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), as explained in Section 7.0 of this Report. AECOM’s TTA also sets out compliance with the DMURS.

- 8.62 Policy QHSN4 of the Development Plan states:

*“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.”*

- 8.63 The proposed development will assist in the comprehensive regeneration of the St Teresa’s Gardens and Environs SDRA (renumbered SDRA 11), and will provide for a mixed-tenure, sustainable community through the provision of cost rental and social housing. The proposed development represents the comprehensive regeneration of a brownfield site in an accessible urban location and will provide for a high quality of placemaking and urban design. The proposed development will enhance residential amenity in the area, through the provision of a new public open space, in addition to integrating with the adjacent proposed developments in the SDRA.



**Policy QHSN5 – Urban Consolidation**

*“To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.”*

- 8.64 The site of the proposed development is currently vacant. The development of residential buildings on this site will allow for a more efficient use of land and will support residential consolidation in the City. Overall, the scheme will provide for high quality apartments, that will successfully integrate with the character of the surrounding area, further specific information is contained within MW’s HQA including a large number of oversized and dual / triple aspect units reflecting the quality of the accommodation proposed.

**Policy 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.”*

- 8.65 As set out widely within this Planning Report and other documentation enclosed, the higher densities of the proposed development are appropriate in the context of the Urban Development and Building Height Guidelines 2018 due to the proximity of the site to high-quality public transport links and potential for the proposed development to support compact urban growth. The proposed development accords with the Guiding Principles for the St. Teresa’s Gardens Strategic Development & Regeneration Area (as explained fully below).
- 8.66 The proposed density has had regard to the surrounding context and character of the area. The subject site benefits from high levels of connectivity in the context of public transport, with Dublin Bus routes within 4 minute walking distance and to the Fatima Luas stop (10-12 minutes). New infrastructure is also proposed in close proximity to the site including BusConnects. Proposed pedestrian and cyclist linkages to adjacent sites will result in a significant improvement on permeability in the area enabling future residents to access public transport and nearby amenities.
- 8.67 The proposed development accords with the relevant housing policies, in terms of creating a sustainable development on under-utilised lands at a city location. The development will deliver 543 no. apartments, with other complimentary facilities and amenities including a creche. The proposed development is located in close proximity to existing services and facilities, however a creche will also be provided as part of the development to ensure sufficient social infrastructure. Further details are set out in the Community and Social Audit submitted with the application.
- 8.68 Overall, the scheme will provide for high quality apartments, that will successfully integrate with the character of the surrounding area, further specific information is contained within MW’s HQA including a large number of oversized and dual / triple aspect units.

**“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}.”*

- 8.69 The proposed development is fully consistent with and supports the core principles of the 15 minute city concept by providing a place to live which is within walking distance of essential and recreational services, public transport, facilities and amenities. The proposed mobility hub will further support the accessibility of the area. The proposed development is located in close proximity to existing services and facilities, however a creche will also be provided as part of the development to ensure sufficient social infrastructure. Further details are set out in the Community and Social Audit submitted with the application.

**“Policy 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“*

- 8.70 The proposed development will create a new urban place easily accessible to the City Centre and help to integrate disused lands into the surrounding community.

- 8.71 All public areas have been designed to comply with DMURS and Part M (Technical Guidance Document M - Access for People with Disabilities) enabling users with reduced mobility to move easily throughout the scheme.
- 8.72 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 for greater permeability with surrounding developments.
- 8.73 Communal and public open spaces will benefit from passive surveillance from apartments within the scheme. 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.

***“Policy QHSN12 – Healthy Dublin City Framework and the Healthy Ireland Framework 2019 – 2025***

*To support the Healthy Dublin City Framework and the Healthy Ireland Framework 2019-2025 in promoting a long term vision of improving the physical and mental health and well-being of the population at all stages of life.”*

- 8.74 The proposed development encourages an active lifestyle by making active transport an attractive mode of transport. The proposed development also provides ample open and green recreational areas.
- 8.75 These actions contribute to the overall physical and mental well-being of residents and users of the proposed development.

***“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}.”*

- 8.76 All public areas have been designed to comply with Part M of the Building Regulations in compliance with enabling 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. Please refer to the Architectural and Landscape Design Statement prepared by MW and AECOM for further details of accessibility and in terms of universal design considerations. A statement on Safety and Security (Section 5.14) is included within the Architectural Design Statement prepared by MW.

***“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.”

- 8.77 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.

**“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”*

- 8.78 The proposed development improves the connectivity of the wider area by delivering a highly permeable development that is not gated to the public.

**“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.”*

- 8.79 The proposed development is located in close proximity to daily essential services. These apartments may be suitable for older people wishing to downsize to accommodation that is more reflective of their requirements, while still living independently. Please also see Design Statement prepared by MW.
- 8.80 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.

**Objective QHSN010 – 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.}*

- 8.81 The Universal Design Guidelines for Homes in Ireland notes that “*Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability*”. It further notes, “*The guidelines are not intended to be overly prescriptive, but provide a flexible framework for designers to apply the guidelines creatively to all new home types through incremental steps described as UD Homes and UD Homes +.*”

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).

- 8.82 All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme. 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 with the standards set out in 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.

- 8.83 The proposed Donore Project provides for 6 no. apartments which are specifically designed for peoples with disabilities. In addition, all of the proposed oversized units in the scheme, have been designed to be able to accommodate older people and people with disabilities with UD principles to the fore including:

Development Sites

- Close to public amenity spaces, with good access to transport, local shops, pubs and cafes
- Relatively flat site, avoiding steep gradients
- The design provides a clear hierarchy of streets that is logical, and easy to understand and integrate with the existing context
- Site-wide material selection with consideration for slip rating
- Dropped kerbs are proposed at all junctions
- All homes are design to a high standard and of good quality, using sustainable materials with quality detailing
- There is a mix of tenure and home size
- Bin stores are easy to use and accessible

- 8.84 Entering & Moving Around

- Consideration for door design including ironmongery, door width, threshold design
- A canopy of minimum 1500mm deep for the full width of the entrance, and a maximum heigh of 2800mm

- Corridor widths and 1800mm wide corridors, facilitating passing
- Internal corridors between 1050-1200mm
- Effective door widths of 800-850mm as required
- Continuous handrail on one side of the stair at 900-1000mm above the pitch line of the stair, and 1100mm above landings
- 300mm nib on the leading edge of the lift car doors

#### 8.85 Spaces for Living

- Level access throughout apartments
- 1200-1500mm between opposing work surfaces in the kitchen
- 1200mm wide space on two sides of dining table
- Dining area immediately adjacent to the kitchen
- Bathroom doors opening outwards
- Level access to balconies
- Easily maintained and effective drainage to all balconies and terraces, ensuring water cannot pool and create a hazard

#### 8.86 Elements and Systems

- Flexible and low maintenance ventilation systems that are easy to understand and use, affordable and reliable, with easily replaced parts
- The majority of this section relates to detailed design items and will be considered and incorporated as required post-planning.

8.87 For further details on Universal Design please refer to the Design Statement prepared by MW Architects.

#### ***“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.”*

8.88 The scheme provides a 28% - 72 % split in tenure as follows:

Unit types	Social Housing –	Cost Rental –
Studio		36 no.
1 Bed 2 Person	65 no (33 no. housing for older people)	124 no.
2 Bed 3 Person	6 no. (Universal ++ standard)	46 no.
2 Bed 4 Person	64 no.	158no.
3 Bed 5 Person	19 no.	25no.
Total	154 no.	389 no.

8.89 The proposed development entails a broad mix of units across two tenures making a significant contribution to affordable housing in the area, as described in the MW Design Statement:



*In terms of design, the scheme is tenure blind with each tenure having dedicated cores but sharing podium level communal spaces. The two tenures are mixed across all of the blocks apart from DCC6 which is a single tenure.*

*One core in DCC3 is dedicated to housing for older people (social housing). This is located the centre of the proposed SDRA 11 lands, and facing onto Player's Park."*

8.90 Policy QHSN34 of the Development Plan states:

*"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."*

8.91 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 MW Architects. 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.

***"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"*

8.92 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.

***"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."*

8.93 The primary purpose of the residential content of the scheme is to meet clear demand for affordable rental and social apartments in urban locations.

8.94 The development contains the following mix of apartments:

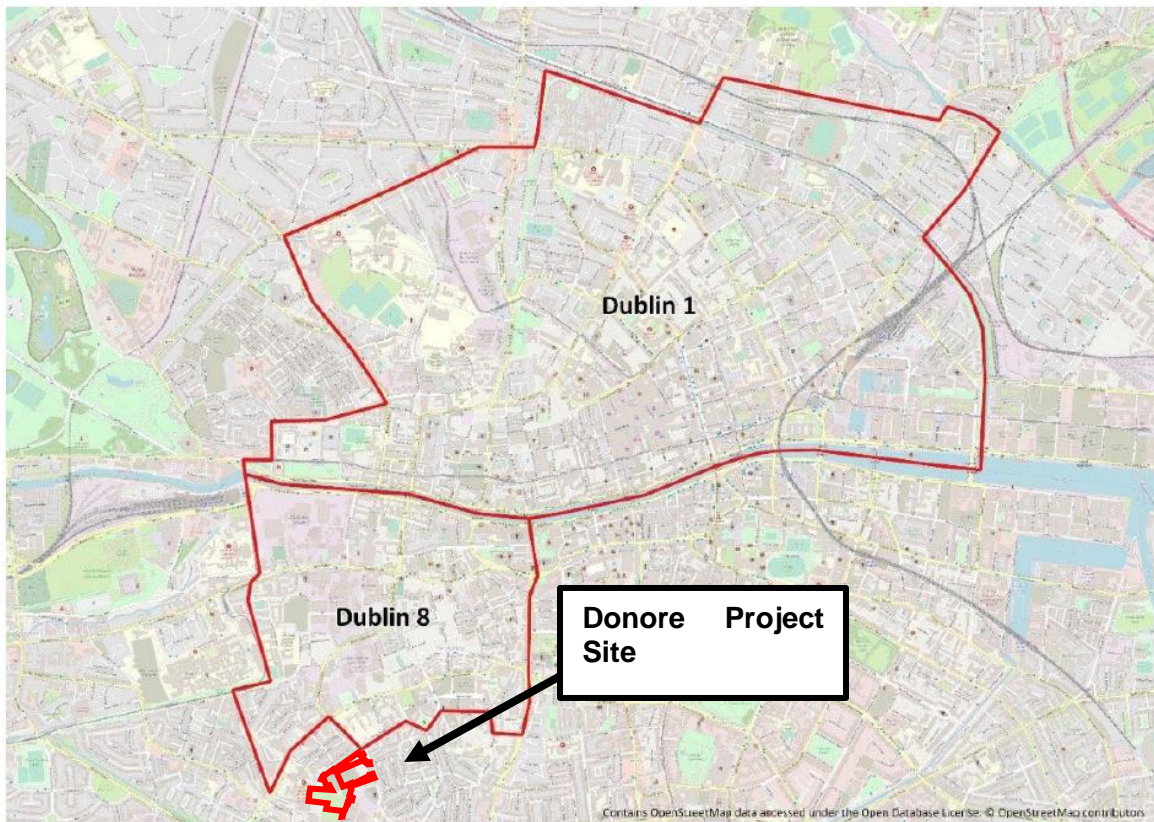
- 225 No. 1 bed apartments (36 no. 1-person & 189 no. 2-person), (41.4%)
- 274 No. 2 bed apartments (including 52 No. 2 bed 3 person apartments & 222 No. 2 bed 4 person apartments) (50.4%)
- 44 No. 3 bedroom 5-person apartments

8.95 The Development Plan within Chapter 15 states:

*“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.”*

- 8.96 The proposed development is not located within the Liberties sub-area (see Figure 8.2 below) as identified for a specific unit mix policy within the Development Plan Housing Need and Demand Assessment (Appendix 2 of the Development Plan). Therefore is not subject to further unit mix requirements.



**Figure 8.2: extract from the DCC Sub-City Housing Need and Demand Assessment with Donore Project site redline indicated (Source: DCC,2022).**

- 8.97 The proposed unit mix is compliant with the standards set out in the Development Plan (as it does not propose in excess of 50% studio / 1 bed units). The scheme makes a significant contribution to housing in the area through the provision of a scheme which is 100% affordable housing. This includes a 28% - 72 % split in tenure as follows: Social Housing of 28% and Cost Rental of 72%. This combination of tenures will make a significant contribution to affordable housing in the City.

#### ***“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.”*

- 8.98 The development will be managed by the LDA.

***“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.}”*

- 8.99 The proposed development will deliver a range of high-quality neighbourhood and community facilities including a public plaza, public open and green space, and children’s play areas. The proposed development also includes a range of community, arts and cultural spaces within the overall development.

***“Policy 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”*

- 8.100 A Community and Social Audit has been prepared and is submitted with this application.

***“Objective QHSN012 – Community Safety Strategy***

*That all housing developments over 100 units shall include a community safety strategy for implementation.”*

- 8.101 A statement on ‘Safety and Security’ (Section 5.14) is included within the ADS prepared by MW. In regard to public realm the ADS states which states:

- *“The development has high degree of passive surveillance of the streets and associated spaces. Block DCC3 will provided passive surveillance of the Donore Project park to the west and Players Park to the south. Likewise DCC5 will provide passive surveillance to the Donore Project park to the east. DCC 1 has been designed to overlook the new sports pitch (to be delivered by Hines).*
- *The public realm has been designed as an integral part of the scheme. As indicated previously, the scheme must be viewed in the context of the overall SDRA Framework Plan and Masterplan, whereby the larger public open space areas are provided on other parts of the wider lands. However, the streets provide safe and pleasant environments for future residents and visitors.*
- *Public spaces are all clearly defined. Where appropriate, street level private open space is provided with a planted privacy buffer from the street.*
- *As indicated previously, on-street parking is deliberately limited. Where provided, parking spaces are clearly delineated adjacent to the vehicular surface.*
- *The site is relatively flat and designed to accommodate easy circulation and uses.”*



### **“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.”*

- 8.102 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.
- 8.103 The proposed development is considered appropriate for reduced car parking provision. Further details are set out in the TTA and Mobility Management Plan submitted with the application, prepared by AECOM. 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 south inner-city neighbourhood of South Circular Road / Cork Street.
- 8.104 The BusConnects project will further enhance dedicated bus facilities and improve the Dublin Bus network. Proposed Core Bus Corridor no. 9 is proposed to run along Cork Street, to the north of the subject site. This will also deliver improved cycling facilities along Cork Street.
- 8.105 Furthermore, the development has sought to enhance permeability across the site, creating enhanced pedestrian and cycling accessibility through the improvement public realm.
- 8.106 As above, the development is considered appropriate for reduced car parking provision in accordance with the Development Plan, and also the Apartment Guidelines 2020. The proposed development includes 79 no. car parking spaces comprising 6 no. car parking spaces for mobility impaired users, together with a further 15 no. on street short term spaces. 30 No. car share spaces and 50% of parking spaces will be equipped with Electric Vehicle charging points.
- 8.107 The TTA 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.

### **“Policy SMT2 – Decarbonising Transport**

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

### **“Policy SMT5 – Mobility Hubs**

*To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro*

*mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.”*

- 8.108 A mobility hub is proposed to support sustainable transport facilities as part of the development.

**“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.}”*

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

**“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.”*

- 8.110 The design 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.”*

- 8.111 The proposed development 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. A mobility hub is included within the development 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.”*

- 8.112 The proposed development will improve connectivity for pedestrians by allowing the public to pass through the development.

**“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.”*

- 8.113 The proposed development provides 906 no. bicycle spaces located in secure storage and a further 138 visitor spaces dispersed throughout the development at surface level.

**“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.”*

- 8.114 The proposed development will deliver 50% 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”*

- 8.115 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 with DMURS has been set out in the TTA prepared by AECOM.

**Chapter 9: Sustainable Environmental Infrastructure And Flood Risk**

**“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.*



- 8.116 Irish Water has confirmed the feasibility of connecting the proposed development to the public water supply.

***Policy 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.*

- 8.117 Irish Water have confirmed the feasibility of the proposed development in relation to water and wastewater supply and treatment.

***“Policy 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).”*

- 8.118 The surface water design approach complies with the criteria set out in the Greater Dublin Regional Code of Practice for Drainage Works.

***“Policy 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}.”*

- 8.119 The site of the proposed development has been subject to a Site Specific Flood Risk Assessment prepared by AECOM. As part of the SFRA, the site was assessed for tidal/coastal flooding, pluvial, fluvial, groundwater and infrastructure flooding sources and the SFRA confirms that “the site passes the justification test.”

***“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}.”*

- 8.120 A surface water drainage system with SUDS features will be incorporated into the development to drain the entire site and to manage surface water run-off from the site.

***“Policy 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 {and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021)}. 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.”*

- 8.121 The proposed development will utilise SuDS to drain the site and to manage surface run-off from the site. The Infrastructure Report prepared by AECOM 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 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)”*

- 8.122 The proposed development includes green roof areas across the buildings to provide attenuation storage. The Infrastructure Report prepared by AECOM provides further details on the proposals for green roofs which comprise a mix of intensive and extensive types.

**“Policy 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.”*

- 8.123 The Surface Water Management Plan of the proposed development is included in the Infrastructure Report prepared by AECOM Consulting Engineers which is submitted with this application.

**“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).”*

- 8.124 The development will be designed and operated with the aim of a reduction in waste generation through construction and operation. Where possible waste streams will be separated on site and recycled or re used. Where possible local materials will be specified, and in addition materials that contain recycled content will be considered as preferable. An Operational Waste Management and Recycling Strategy has been prepared by AECOM is submitted with the application. This strategy has the following aims:

- *To contribute towards achieving current and long-term national, Eastern Midlands Region (EMR) and DCC targets for waste minimisation, recycling and re-use;*
- *To comply with all applicable legal requirements for handling operational waste and recycling;*
- *To achieve high standards of waste management performance, through giving due consideration to the waste generated during operation of the Proposed Development; and*
- *To provide a convenient, clean and efficient waste management strategy that enhances the operation of the Proposed Development and promotes recycling*

- 8.125 As set out in this strategy, waste generated during the operational phase of the development will be segregated at source. Waste categories will include:

- Dry Mixed Recyclables
- Organic Waste
- Glass
- Mixed Non-recyclables

- 8.126 The Operational Waste Management and Recycling Strategy details the waste management plan for the 543 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 2018.

***“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.”*

- 8.127 As set out in the AECOM Landscape Design Statement, The proposed development includes public open space 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.

***“Policy 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).”*

- 8.128 An Appropriate Assessment Screening Report and Natura Impact Statement has been prepared by Altamar and is submitted with this application. The Infrastructure Report prepared by AECOM 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 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.”*

- 8.129 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.

***“Policy 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.”*

***“Policy 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 and informal play.”*

- 8.130 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. A detailed landscape plan and report has been prepared by AECOM Landscape and is included with the planning application.

- 8.131 Informal play areas are provided throughout the scheme within the main public open space areas and within the proposed communal courtyards and roof terraces catering for toddlers and young children. Play equipment within this area are well located so



as to maintain a distance between boundary walls, which have increased heights to maintain safety, with sufficient buffers from the residential units to maintain residential amenity. Please refer to the accompanying landscape drawings prepared by AECOM Landscape, together with their Landscape Design Report which sets out the play strategy for the subject site. An outdoor play area will be provided adjacent to the creche.

- 8.132 In addition, as per the guiding principles for SDRA 11 as set out in the Development plan, play areas for older children, including the proposed municipal playing pitch, are to be provided on the adjoining sites within the SDRA. As set out within the JSA Community and Social Audit there are a large number of open spaces in the area, notably Weaver Park to the north east contains a range of play space for older children including a skatepark.

#### Car Parking

- 8.133 The Development Plan sets out the maximum standards for car parking, and the minimum standards for cycle parking in Dublin city. The maximum permitted car parking is .5 space per apartment/dwelling. The proposed development will provide for a total of 79 no. car parking spaces, which is below the maximum allowable standard of 273 no. spaces therefore in accordance with the Development Plan standards.
- 8.134 Table 2 of Appendix 5 sets out maximum level of on-site parking to be provided for residents, staff and visitors for various types of development. These car parking standards shall be generally regarded as the maximum parking provision and parking provision in excess of these maximum standards shall only be permitted in exceptional circumstances e.g. boundary areas, or where necessary for the sustainable development of a regeneration area (see Chapter 13).

**Table 2: Maximum Car Parking Standards for Various Land Uses**

Category	Land-Use	Zone 1	Zone 2	Zone 3
<b>Accommodation</b>	Hotel <sup>1</sup>	None	1 per 3 rooms	1 per room
	Nursing Home	1 per	1 per	1 per
	Retirement Home	3 residents	2 residents	2 residents
	Elderly Persons Housing	1 per	1 per	1 per
	Sheltered Housing	4 dwellings	2 dwellings	2 dwellings
	Student Accommodation	None <sup>2</sup>	1 per 20 bed spaces	1 per 10 bed spaces
	Houses Apartments/ Duplexes	(+) (0.5) per dwelling	1 per dwelling	1 per dwelling

<b>Civic, Community and Religious</b>	Bank Community Centre Library Public Institution	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
	Place of Worship	1 per 100 seats	1 per 25 seats	1 per 10 seats
	Funeral Home	4 off street parking spaces	4 off street parking spaces	4 off street parking spaces
<b>Education</b>	College of Higher Education	None	1 per classroom plus 1 per 30 students	1 per classroom plus 1 per 30 students
	Crèche/ Childcare Services <sup>3</sup>	1 per 100sq.m. GFA	1 per 100 sq. m. GFA	1 per 100 sq. m. GFA
	School <sup>4</sup>	None	1 per classroom	1 per classroom

8.135 The Plan states that residential parking spaces are mainly to provide for car storage to support family friendly living policies in the City. It is not intended to promote the use of the car within the City.

8.136 As set out in the Plan by Objective 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"*

8.137 Car parking for housing developments can be provided in the form of on street or curtilage car parking. Car parking located on-street that is proposed to be taken in charge at a future time cannot be allocated to any specific use and are considered public car parking spaces.

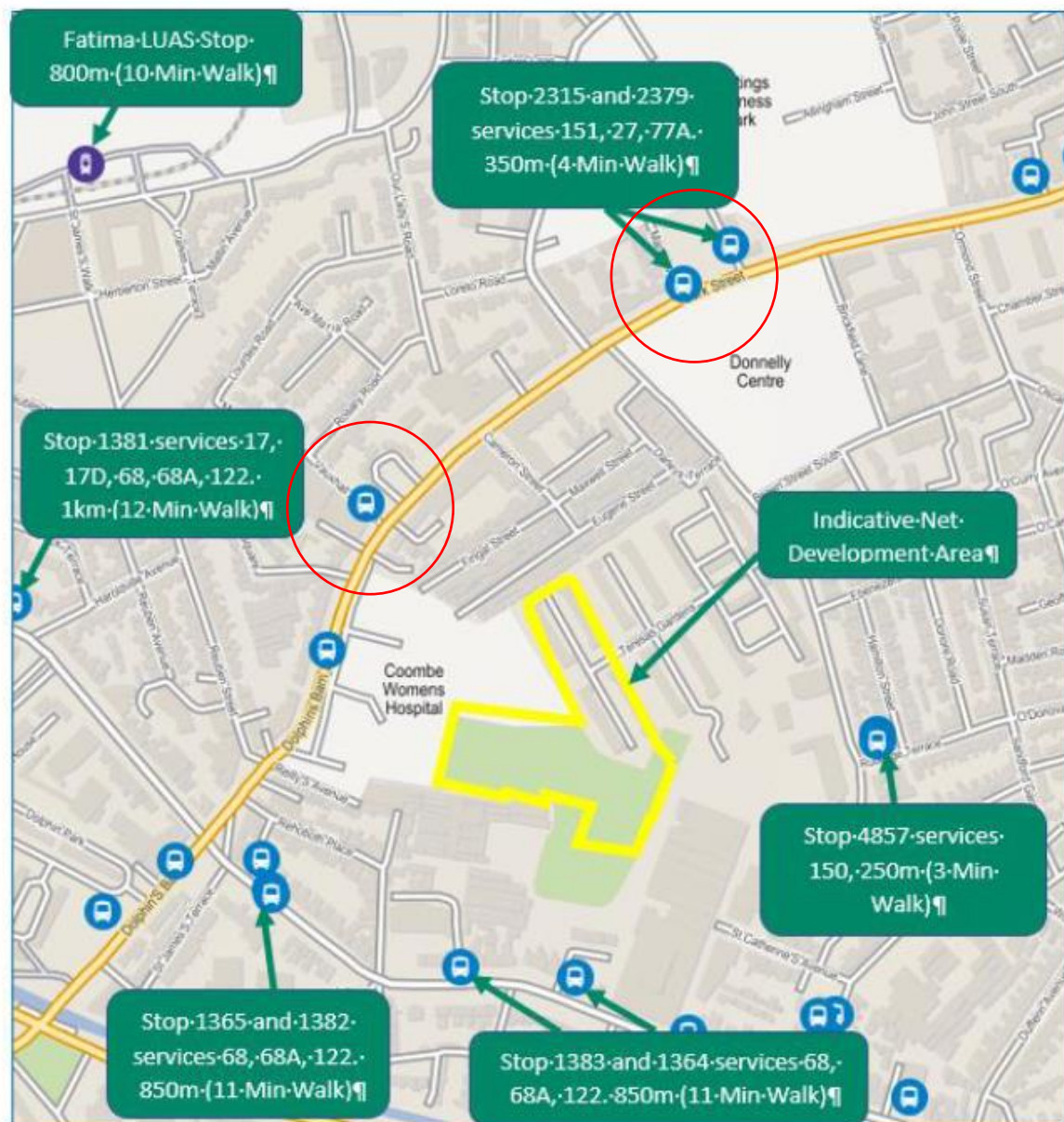
8.138 Further text in the Development Plan states:

*"A departure from the standards set out in Table 1 may be acceptable in limited circumstances on a case-by-case basis at the discretion of Dublin City Council. The applicant must fully engage with Dublin City Council at pre-application stage to ascertain any deviations from the above standards. For any land use not outlined in Table 1, the default parking rate will be calculated based on those of a comparable use and/or determined as part of a Transport and Traffic Assessment and/or Mobility Management Strategy."*

8.139 The site will provide significant connectivity enhancements through the provision of key access routes to adjacent developments from Rehoboth Place, South Circular Road, Donore Avenue and Margaret Kennedy Court. All routes through the scheme

facilitate pedestrians and cyclists as a priority. Generous footpaths and shared surfaces are provided to encourage pedestrian and cyclist use and permeability.

- 8.140 The Sustainable Urban Housing: Design of New Apartments Guidelines (December 2020) states that the 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.
- 8.141 In Central and/or Accessible Urban Locations, 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 this project site.
- 8.142 As illustrated in Figure 8.3 below the site is situated to benefit from bus transport connections allowing all site users to travel by this sustainable mode. There are 10 no. bus stops located within a 400m walking catchment of the site. These bus stops are operated by Dublin Bus.



**Figure 2.5 Existing Bus Stops**

**Figure 8.3: locations of nearby bus stops (Source: AECOM, 2022).**

- 8.143 The NTA have published BusConnects Dublin, a €2 billion scheme that comprises a strategy to develop out continuous bus lanes along a series of bus corridors across Greater Dublin. The NTA envisages that the benefits will include improved bus service frequency and reliability, whilst also providing cycling priority along key corridors in Dublin. If the Bus Connects scheme goes ahead this can be facilitated without impacting the principles of the development. The scheme includes a series of corridors into Dublin City Centre. Of relevance to this scheme is 'Spine D' with routes D1,D2,D3,D4 and D5.
- 8.144 As set out within the TTA the MMP aims to increase and facilitate the number of people choosing to walk, cycle or travel by public transport to the development. A series of measure are set out within the help achieve this modal shift. The proposed development is situated within an ideal location to benefit from existing sustainable



travel facilities. Cork Street and South Circular Road enjoy high levels of cycling on both the west and eastbound lanes during the weekday peak hour periods, providing an attractive and viable mode of transport to Dublin City Centre, as opposed to private car. High frequency with spare capacity bus services are available from Cork Street and South Circular Road, which connect the site to numerous local destinations including Dublin City Centre. Given the site is highly accessible via walking, cycling and public transport, and a series of sustainable transport measures are proposed in the MMP, the development is well placed to promote sustainable travel from the onset.

8.145 The TTA states:

*“It is anticipated that the traffic impacts generated from the social and cost rental accommodation element of the proposed development will be smaller in volume than the mainstream housing due to the socio economic standing of the proposed demographic within the site. Proof is provided through the Census 2016 data analysis, indicating high levels of walking and active travel transport choices. Therefore the proposed lower car parking facilities in the proposed site will be adequate to the proposed development resident demographic and location.”*

8.146 As set out in the Public Transport Assessment:

*“The assessment has highlighted that there is more than enough capacity on existing service to cater for the forecast level of public transport trips from the site. The sensitivity analysis has also shown that there is sufficient capacity to accommodate a greater than forecast level of public transport trips from the site. It should also be noted the site will benefit from a significant increase in bus frequencies under BusConnects Network Redesign proposal which are currently being rolled out within the Dublin Metropolitan area on a phased basis”*

8.147 In summary the proposed development is well suited to a lower provision of car parking spaces for a number of reasons. Primarily due to its locational characteristics close to public transport as set out above. Further, a mobility management plan has been submitted as part of this application to highlight the objectives and measures that will be undertaken as part of the proposed development to encourage active modes of travel; A significant quantum of Electric Vehicle (EV) charging points are provided. As detailed below there is a significant quantum of cycling parking provision.

#### Cycle Parking

8.148 The minimum requirement for cycle parking for residential apartments is one long term space per bedroom, and one visitor space per two apartments. This gives rise to a minimum provision of 1,177 no. parking spaces (905 no. long term + 272 no. visitor). 906 no. long term resident spaces are proposed which meets the Development Plan standard, while a further 138 no. visitor spaces are proposed at surface level. While this is less than the numbers specified in Table 1 of Appendix 5 (see Figure 8.4 below), we also note the Development Plan provides some flexibility in this regard.

8.149 Appendix 5 ‘transport and mobility technical requirements’ of the Dublin City Development Plan provides more detail stating:

*Having regard to the Sustainable urban Development: Guidelines for New Apartments (2020), cycle parking for residential apartment units shall be provided at a rate of 1 secure cycle parking space per residential bedroom and 1 visitor cycle parking space for every two units. Relaxations of this standard may be considered in certain instances where the applicant can justify the proposed quantum having regard to location, quality of facilities, flexibility for future enhancement / enlargement and availability of alternative transport facilities.*

- 8.150 As noted above, and as set out in the TTA report prepared by AECOM, given the site's highly accessible location which is proximate to a range of high quality public transport services, a large number of the visitors to the site are likely to arrive by public transport or on foot. In these circumstances the level of provision of bicycle visitor parking is considered appropriate.

**Table 1: Bicycle Parking Standards for Various Land Uses**

Category	Land-Use	Zone	Long Term	Short Stay/ Visitor
<b>Accommodation</b>	Hotel <sup>1</sup>	All Zones	1 per 5 staff	To be determined by the Planning Authority on case by case basis
	Nursing Home Elderly Persons Accommodation/ Sheltered Housing <sup>2</sup>	All Zones	1 per 5 staff 1 per 5 residents	1 per 10 residents
	Residential Apartment <sup>3</sup>	All Zones	1 per bedroom	1 per two apartments
<b>Education</b>	Crèche/Childcare Services <sup>4</sup>	All Zones	1 per 5 staff	1 per 10 children
			1 per 5 staff	

**Figure 8.4: Table 1 of Appendix 5 of the Development Plan 'bicycle parking standards.**

- 8.151 The proposed development also includes a mobility hub, the Plan 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.

#### EV Charging

- 8.152 Appendix 5 of the Development Plan states:

*"All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces*

*shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications”*

- 8.153 The proposed development provides ducting for all spaces in addition to 50% of all car parking space are equipped with EV Charging Points.

#### Community/Arts/ Culture

- 8.154 We note the following in regard to cultural and arts spaces, the Plan states:

#### **“Objective 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 {at a minimum} 5% community, arts and culture {spaces including exhibition, performance,} and artist workspaces {predominantly} internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*

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

#### **“Objective 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.”*

- 8.155 A Community and Social Audit has been prepared and is submitted with this application. The proposed development consists of a residential scheme containing 543 No. apartments with a Net Internal Area of **36,218m<sup>2</sup>**. 5% of this area equates to **1,811m<sup>2</sup>**. A minimum of 50% of this area must be provided on site in the form of community/arts/cultural space, which equates to **905.5m<sup>2</sup>**.
- 8.156 Within the proposed development the applicant proposes to provide **952m<sup>2</sup>** of internal floor space devoted to a mixture of community, arts and cultural space, broken down as follows:
- Community: Creche 664m<sup>2</sup>
  - Arts: Artist Workspaces 160m<sup>2</sup>
  - Culture: Cultural space 128m<sup>2</sup>

- 8.157 For further detail on this space please see MW's Architectural Design Statement and associated drawings.
- 8.158 On the basis of the above there is a shortfall of 857m<sup>2</sup> of floorspace to be provided within the vicinity of the site. It is proposed that that this shortfall would be accommodated within the proposed refurbished and extended nearby Donore Community Centre, which when complete, will have over 1,400m<sup>2</sup> of community space. It should be noted that this community centre is located within the blue line boundary under the ownership of Dublin City Council. We attach a letter from Dublin City Council confirming acceptance of this proposal to satisfy compliance with Objective CU022 as Appendix 4 of this Report.

#### SDRA 11 St Teresa's Gardens and Environs

- 8.159 The subject site is located in the area of SDRA 11 St Teresa's Gardens and Environs and is subject to the guiding principles for development of this SDRA. The guiding principles for development in SDRA 11 are set out in the Development Plan as follows:

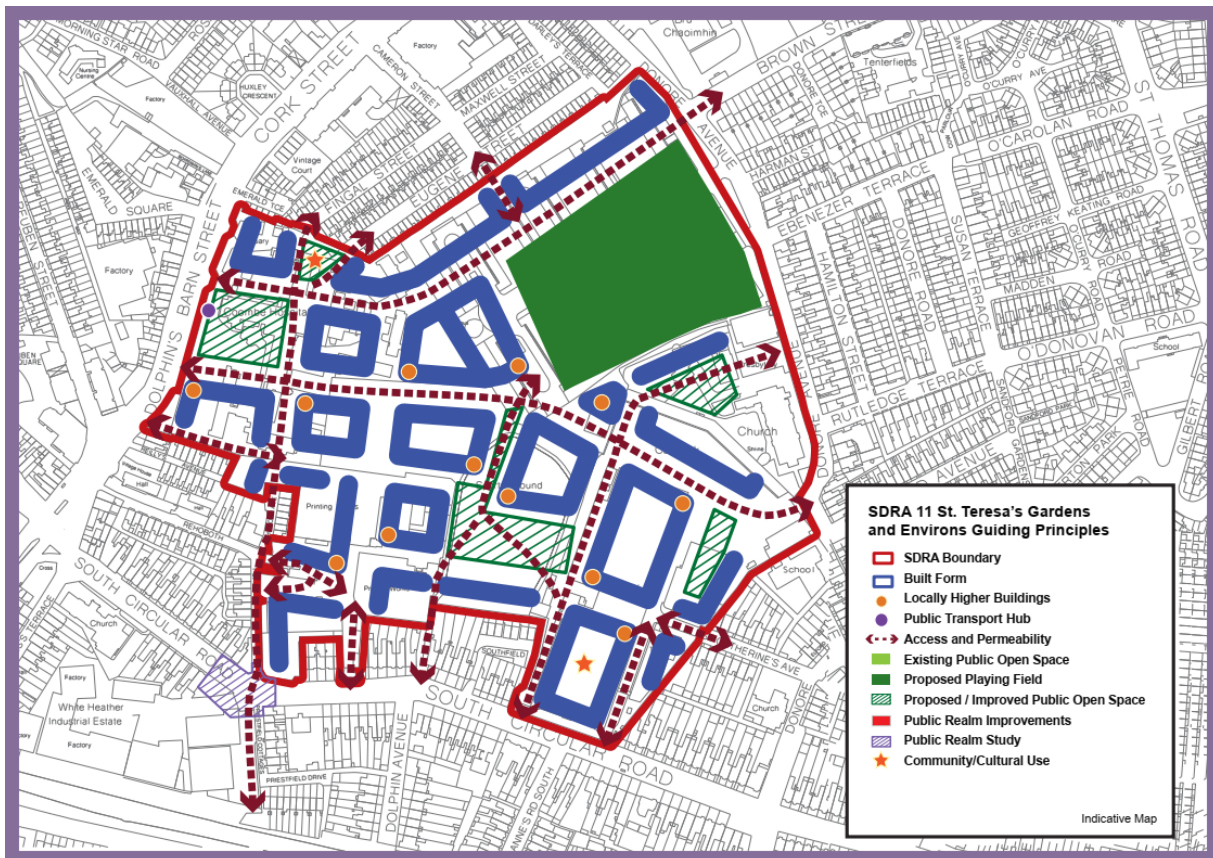
#### **Urban Structure**

*"The proposed urban structure provides a strategic blueprint for the future development of the SDRA, identifying key connections, public open spaces, locations for increased height and building frontages that will inform an urban design-led approach to the regeneration of this strategic area. The development of a network of streets and public spaces will be promoted to ensure the physical, social and economic integration of St. Teresa's Gardens with the former Player Wills and Bailey Gibson sites. The potential for further integration with the Coombe Hospital is indicated on the Guiding Principles Map but is indicative only. Integration of the White Heather Industrial Estate lands should be investigated in the future.*

*The movement framework and street structure, as illustrated in the Guiding Principles Map, introduces permeability through the site, based on proposed key east-west and north-south links and several proposed local access streets. Ensuring north/south (Cork St. and Donore Avenue connection to South Circular Road) permeability and east/west (Dolphin's Barn Street and Cork Street) is achieved. Generous well designed, attractive multifunctional public open spaces with good orientation, connectivity, passive and active supervision/ overlooking etc. will be provided and will deliver high quality residential and public amenity.*

*A new public park is proposed as a landmark feature with passive supervision by residential and other uses; it will have a comprehensive landscaping strategy to provide significant greenery within the site and will make provision for a diverse range of recreational and sporting facilities for use by the wider neighbourhood and will provide for an area sufficient in size to accommodate a minimum 80 m by 130 m playing pitch."*





**Figure 8.5: SDRA 11 St. Teresa's Gardens and Environs Guiding Principles. Source: Dublin City Development Plan 2022-2028.**

8.160 The proposed street network has been developed in response to the SDRA guiding principles map, including street layout and key connections to the surrounding neighbourhoods. The Donore Project lies at the centre of SDRA 11 with a network of streets that will encourage permeability across the site and through adjacent lands. The street layout and public space design has been coordinated with the adjacent development at Player Wills + Bailey Gibson Lands and provides a key linking piece between Donore Avenue, South Circular Road and the Coombe Hospital lands.

8.161 The proposed development accords with the other elements of the guiding principles diagram for the SDRA in terms of block structure, height, location of open spaces, pedestrian and cyclist access through the site as further detailed below. The quality and quantum of public open space proposed meets the requirements set out in SDRA 11 including passive supervision and is part of a wider landscape strategy.

8.162 As set out in the MW Architectural Design Statement:

*“A public space provided between DCC3 and DCC5 called the Donore Project Park, will provide a landscaped pedestrian route through the site which ultimately connects Cork Street and Donore Avenue through to the South Circular Road. Potential connections with the Coombe Hospital lands are provided and temporarily landscaped prior to the Coombe Hospital lands being developed. The proposed site, along with development of the adjacent SDRA 11 lands, will include a highly permeable network of streets that will focus on pedestrian and cycle accessibility. Neighbouring residents and future occupants will be able to move freely as result of connections formed through the proposed development and this will allow everyone*

*to take full advantage of the attractions and services offered. By encouraging a mix of occupiers and uses, including independent businesses and retailers, the development will encourage the sustainable growth and stability of new local services.”*

- 8.163 Further the development will also integrate with the wider regeneration area. The proposed development will provide for a significant quantum of much needed housing including social housing, along with ancillary facilities including a creche community facilities and artist space.
- 8.164 Overall the proposed development comprises a comprehensive design led response to the site and seeks to integrate with the wider regeneration of the area, in particular with separate proposals for the Player Wills and Bailey Gibson sites providing key linkage piece between Donore Avenue, South Circular Road and The Coombe Women & Infants University Hospital.

### **Land Use & Activity**

*“The area will primarily support residential uses, complemented by a range of community facilities accessible to the wider community, such as the playing pitches on the northern end of the site and community facilities located in the former Player Wills building. This will include the provision of elements such as a GAA pitch on the DCC lands, local parks on the Baily Gibson and Player Wills sites, including a playground on the Player Wills site.*

*The area will promote a mix of tenure and residential unit types with social, affordable and private units being provided across the site and a mix of one-bed, two-bed and family sized units.*

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

- 8.165 The Guiding Principles for SDRA 11 set out that the primary use land use proposed for the SDRA will be residential, along with open space including a playing pitch and local parks, along with the potential expansion of the St. Catherine’s National School. The proposed development will provide for a significant quantum of residential development, which will assist in the full utilisation of community facilities proposed as part of the wider regeneration of the SDRA.
- 8.166 A playing pitch is provided as part of the Bailey Gibson 2 development current SHD application before the Board (Ref. 314171-22). The proposed development integrates with this anticipated and permitted development.
- 8.167 The development provides a significant quantum of social and cost rental units complementing the proposed uses at the Player Wills and Bailey Gibson sites.
- 8.168 The majority of community uses community, arts, cultural and exhibition space together with artist and photography studios, are located within the Player Wills Factory and to be proposed as part of the adjacent Hines’s development (ABP-308917-20). A further element of community facilities is proposed as part of the subject application. This will be located with access onto the Donore Project Park

which is suitable for more public uses. Uses include a crèche, cultural / artistic space and mobility hub.

- 8.169 Provision for the expansion of St Catherine's National School has been accommodated within the Player Wills site within the application by Hines (ABP Reg. Ref. (ABP-308917-20).

### Height

- *"In general, the height strategy for the SDRA is that building heights in the range of ~~{3}~~(6)-8 storeys will be considered the baseline height for new developments, subject to adequately interacting with the existing building heights adjacent to the subject site.*
- *The SDRA Guiding Principles Map identifies locations suitable for increased height over and above the standard 6-8 storeys, subject to compliance with Appendix 3 of the development plan.*
- *The SDRA Guiding Principles Map identifies opportunities for ~~(landmark buildings)~~ (locally higher buildings) in the order of ~~15~~(22) storeys to frame the proposed centrally located open space and to enhance the legibility of the built environment. The acceptability of such ~~(landmark buildings)~~ (locally higher buildings) will be subject to compliance with the performance criteria for ~~(landmark buildings)~~ (locally higher buildings) set out in Appendix 3 of the development plan."*

- 8.170 The Guiding Principles for the SDRA, as contained in the plan, set out a height strategy for the SDRA. The Guiding Principles promote increased heights relative to the surrounding areas, with a baseline height of 3-8-storeys, and provision for locally higher buildings of up to 15-storeys as part of the wider proposals for the site. This includes three such locally higher building located within the subject site (see Figure 8.5 below). The proposed development incorporates one building of 15-storeys, with the majority of the proposed buildings being 6-7 storeys. The proposed development therefore conforms with the height guidelines of the SDRA 11.

### Design

- *"High-quality public realm will be required and shall be applied to the network of streets and public spaces. Public realm improvements/studies at the key junctions of Dolphin's Barn/South Circular Road and Cork Street/ Donore Avenue will be supported.*
- *The existing established residential amenity of properties along South Circular Road, Donore Avenue, Eugene Street ~~{and all adjacent streets,}~~ shall be respected. As such, proposed developments will be required to demonstrate integration with the surrounding streetscapes.*
- *{Design shall protect the special character of the listed Player Wills factory and its setting.}"*

- 8.171 The proposed development is of a high architectural and urban design quality, which will encourage active uses in the public realm. As part of the proposed development public open space in the form of a park is proposed, which will add to the vibrancy and vitality of the SDRA 11. The proposed development will not impede any plans to incorporate expanded community and school uses into the wider proposals for the SDRA and will contribute positively to the use of existing and proposed community facilities.

8.172 As set out within the MW Architectural Design Statement:

*“The Donore Project has a boundary with the existing homes at Margaret Kennedy Road. Building heights have been reduced to the northern edge of DCC1 with consideration for the residential amenity of the adjacent homes on Margaret Kennedy Road. In addition, these homes have been given detailed consideration as part of the Sunlight Daylight assessment by 3D Design Bureau forming part of this Part 10 application. With regard to the residential amenity of homes on South Circular Road, Donore Avenue and Eugene Street, proposed development adjacent to these streets will form part of Hine’s proposals for the adjacent SDRA 11 lands (permission references ref. Hines Phase 1 Bailey Gibson 1 ABP-307221-20 and Hines Phase 1 Player Wills ABP- 308917-20).”*

8.173 Please see TVIA contained within the EIAR, which assesses the potential impact of the development in terms of streetscape and visual impact. The TVIA lists the sensitive receptors in the area included residential uses on Southern Circular Road , Donore Avenue and Eugene Street. 3DDB have set out the focus and rationale of their assessment within the Daylight Sunlight Assessment Report enclosed. The development is located some distance from residential uses on South Circular Road and Eugene Street. It is also separated by the extant permissions at Hines Phase 1 Bailey Gibson 1 ABP-307221-20 and Hines Phase 1 Player Wills ABP- 308917-20. The potential impact on residential uses along Margaret Kennedy Road are assessed within the 3DDB Report.

8.174

With regard to townscape impacts the TVIA states:

*“It will be sympathetic to the existing surrounding townscape character and integrates comfortably into the established urban grain as it will not change the fabric of the overall existing and emerging townscape character within the study area. The Proposed Development will consolidate and define the character of the area as the intensification of built elements will develop a cohesive townscape character.”*

8.175 With regard to the cumulative impact residential the TVIA states:

*“The composition with the Proposed Development the Player Wills proposal and lower, less present BG 2 proposal in available open views will improve legibility of the townscape character.*

*Considering the Proposed Development with the permitted and / or proposed developments, the proposal will integrate with these developments and create a significant new urban quarter. The visibility of these developments in combination completes the transformation of this area within the south Dublin city core into a new part of the city, north of the Grand Canal.”*

8.176 The proposed development will incorporate a high-quality public realm, with finishes to match those of other public realm proposals for adjacent sites, which will create a sense of continuity and placemaking in the SDRA. The proposed development provides for public, private, and communal open space, which will enhance the residential amenity for future occupants and provide visual permeability through the site.

8.177 The Donore Project Park located between DCC3 and DCC5 will make a significant contribution to the overall provision of public open space across the SDRA11 lands.



The Donore Project development lies at the centre of the SDRA lands. The Donore Project Park consists of a series of high quality, functional, amenable, well overlooked, permeable active and passive open spaces and informal play spaces which are interconnected with a network of pedestrian and cycle routes.

- 8.178 The proposed streets link with the other adjacent plots and the Donore Project Park provides a key green, pedestrian route through the site which ultimately connects Cork Street and Donore Avenue through to the South Circular Road. Potential connections with The Coombe Women & Infants University Hospital are also provided and temporarily landscaped prior to the Coombe lands being further developed.

### **Green Infrastructure**

- *“The provision of public open space and permeability through the site will contribute towards the creation of new green infrastructure in the area.*
- *At least 20% of the SDRA site is to be retained for public open space, recreation and sporting facilities including an area to facilitate organised games”*

- 8.179 The Guiding Principles of the SDRA specify that the area should have an open and permeable urban structure and include public open space and recreation facilities. The proposed development incorporates public open space in line with this principle and will facilitate permeability through the site in conjunction with proposals for adjacent sites. The proposed permeability improvements broadly follow those set out in the Guiding Principles map, with a minor adjustment to the north-south axis.

- 8.180 The SDRA Guiding Principles also set out that the public realm in the area is to be of a high quality, and that the area is to incorporate 20% open space and green infrastructure.

- 8.181 As noted above, the proposed development includes provision for 16.64% of the net developable area to be set out as public open space. Notwithstanding the fact that the various public parks proposed in the two extant Player Wills and Bailey Gibson permissions, together with the proposed municipal playing pitch included in the current SHD application (Ref. ABP- 314171-22 ) before the Board, will ensure that the overall SDRA requirement to retain 20% of the regeneration area as public open space will be exceeded, the applicant is will to accept the imposition of a condition requiring the payment of a financial contribution in lieu of any shortfall of public open space within the subject site, as is provided for under Section 15.8.7 of the Development Plan.

- 8.182 The Playing Pitch is to be located to the north of the site as part of proposals to be developed by adjacent landowner (this is the subject of a current SHD application to An Bord Pleanála ABP Reg. Ref. 314171-22). This anticipated use has been incorporated into the overall design strategy for the site.

- 8.183 The various public parks proposed in the two extant permissions on Player Wills and Bailey Gibson sites, together with the proposed municipal playing pitch included in the current SHD Bailey Gibson (BG2) application (Reg. Ref. ABP 314171-22) before the Board, will ensure that the overall SDRA requirement to retain 20% of the regeneration area as public open space will be exceeded.

- 8.184 2 no. public parks have been proposed as part of the Players Wills development (SHD Reg. Ref. ABP-308917-20); Players Park and St Catherine's Park. The proposed development includes Donore Project Park, which will link the Players Park with the Playing Pitch to the north, and is accordance with the indicative map for SDRA 11 included in the City Development Plan 2022-2028 (see Figure 8.5 below). Overall, significant public open space provision of 3,408 sqm is provided as part of this development, which equates to 16.64% of the net developable area. This provision of public open space exceeds the general Development Plan requirement of a minimum of 10% of site area to be public open space.

#### Chapter 15: Development standards

- 8.185 Chapter 15 of the Development Plan relates to development standards. In regard to Key Design Principles the Development Plan sets out the following:

#### Healthy Placemaking

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

- 8.186 Details of the planting, the quality of the public realm and green infrastructure report are set out in the Landscape Design Statement prepared by AECOM. The orientation and the accessibility to daylight and sunlight. The suitability and quality of the public realm is also set out in this report. Public areas are designed to be accessible and attractive to a wide variety of individuals with mobility needs. More generally the development is designed to encourage walking and cycling. A safety and security statement (Section 5.14) is set out within the Architectural Design Statement prepared by MW which sets out a detailed response to use of the public realm.

- 8.187 The proposed development has been designed in compliance with DMURS as demonstrated in the TTA prepared by AECOM.

#### Sustainability and Climate Action

- *“Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies.*
- *Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain.*
- *Materials should be selected which are sustainably sourced and existing materials re-used and recycled wherever possible. The use of green building materials and low embodied energy products such as low carbon cement and recycled materials is encouraged.*
- *Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10.*
- *Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council’s Surface Water Management Guidance – see policy SI25.*
- *New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council’s Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23.*
- *For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA10, CA14, CA15, CA16, CA17 and Section 15.7.2 below.”*

8.188 in response to the above considerations an Energy and Sustainability Report has been prepared by AECOM. Set out within this report is the energy conservation strategy for the development including heat recovery, passive energy reduction, centralised systems and renewable.

8.189 Proposed measures for enhancing biodiversity include planting, green roofs and a living green wall are set out in the Landscape Design Statement and associated drawings.

8.190 Details of a range of SuDS measures proposed and surface water management plan are set out in detail within the Infrastructure Report and Landscape Design Statement prepared by AECOM.

8.191 The centralised heating system proposed will allow future connection to district and/or waste heat networks.

#### *Inclusivity and Accessibility*

*“Dublin City Council will have regard to the Universal Design Guidelines for Homes in Ireland issued by the National Disability Authority and Housing Options for our Ageing Population, issued by the Department of Housing, Local Government and Heritage and the Department of Health, the National Disability Authority’s Building For Everyone: A Universal Design Approach 2012 and will seek to encourage the implementation of best practice standards with regard to access in relation to both indoor and outdoor environments.”*

- 8.192 The proposed development is compliant with Part M of the Building Regulations which ensures people with limited mobility can move easily within the development. The design also includes appropriate accessible parking spaces and dipped kerbs, tactile paving and other landscape features that improve accessibility for a wide variety of users with impaired mobility. Please see MW Design Statement which sets out a Universal Access Statement.

Safe and Secure Design

- *“Maximising passive surveillance of streets, open spaces, play areas and surface parking.*
- *Avoiding the creation of blank facades, dark or secluded areas or enclosed public areas.*
- *Eliminating leftover pockets of land with no clear purpose.*
- *Providing adequate lighting.*
- *Providing a clear distinction between private and communal or public open space, including robust boundary treatment.*
- *Enabling residents to watch over the entrance to their home; recessed entrances should be avoided and front doors should also be overlooked from other houses or from well-trafficked public areas.*
- *Locating back gardens next to other back gardens or secure private areas rather than on to roadways or other public areas.*
- *Ensuring that the layout and design of roads within residential areas encourages appropriate traffic volumes and speeds.*
- *Providing clear and direct routes through the area for pedestrians and cyclists with safe edge treatment, maintaining clear sight lines at eye level and clear visibility of the route ahead.*
- *Using materials in public areas which are sufficiently robust to discourage vandalism.*
- *Avoiding the planting of fast-growing shrubs and trees where they would obscure lighting or pedestrian routes; shrubs should be set back from the edge of paths.*
- *Consulting with An Garda Síochána crime prevention design advisor where appropriate; Dublin City Council will also have regard to the Guidelines on Joint Policing Committees as established under the Garda Síochána Act 2005 as amended (2014), in order to ensure safe and secure communities.*
- *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”*

- 8.193 The proposed development has been design in accordance with the above considerations in terms of layout, design, planting and lighting. In response to this a safety and security statement (Section 5.14) is set out within the Architectural Design Statement prepared by MW. In regard to public realm the ADS states:

- *“The development has high degree of passive surveillance of the streets and associated spaces. Block DCC3 will provided passive surveillance of the Donore Project park to the west and Players Park to the south. Likewise DCC5 will provide passive surveillance to the Donore Project park to the east. DCC*



1 has been designed to overlook the new sports pitch (to be delivered by Hines).

- The public realm has been designed as an integral part of the scheme. As indicated previously, the scheme must be viewed in the context of the overall SDRA 11 Guiding Principles, whereby the larger public open space areas are provided on other parts
- of the wider lands. However, the streets provide safe and pleasant environments for future residents and visitors.
- Public spaces are all clearly defined. Where appropriate, street level private open space is provided with a planted privacy buffer from the street.
- As indicated previously, on-street parking is deliberately limited. Where provided, parking spaces are clearly delineated adjacent to the vehicular surface

The site is relatively flat and designed to accommodate easy circulation and uses"

### **Site Characteristics and Design Parameters**

#### Brownfield, Regeneration Sites and Large Scale Development

- "To encourage innovative, high quality urban design and architectural detail in all new development proposals.
- To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.
- To respect and enhance existing natural features of interest.
- To contribute to the streetscape creating active and vibrant public realm.
- To create animation and create activity at street level and vertically throughout the building.
- To provide for appropriate materials and finishes in the context of the surrounding buildings.
- To ensure land contamination is appropriately dealt with and mitigated against.
- To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.
- To create new compositions and points of interest.
- To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area.
- To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.
- To prioritise pedestrian and cycle movements in connection with public transport infrastructure.
- To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes.
- To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.
- Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood."

- 8.194 A detailed response to the above criteria is set out within the application documentation (see the MW ADS Section 5.08) however a summary is set out here in brief. The proposal will make a significant, positive contribution to the area through a high quality and comprehensive design response to the site. The improvement of permeability and connections through the area including high quality public realm and public open space form an important part of this.
- 8.195 The proposed development has been designed to respond to the existing and emerging character of the area. The architectural design of the proposed buildings is of a high quality and will add interest and variety to the area.
- 8.196 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, safe, easily accessible and easily navigable network of places for pedestrians and cyclists which integrates with the surrounding street layout at Donore Avenue / Margaret Kennedy Road as well as will permitted development at Player Wills and Bailey Gibson sites. These routes allow easy connections with nearby public transport within a 5 minute walk along Cork Street and Fatima Luas stop 10-12 minutes walk.
- 8.197 The proposed site layout has been developed with consideration for adjacent SDRA11 lands and associated extant permissions at Hines Phase 1 Bailey Gibson permitted under application Ref. ABP-307221-20 and Hines Player Wills permitted under Ref. ABP-308917-20 (both subject to Judicial Review). We also note CWTC Multi Family ICAV have recently submitted a Strategic Housing Development Application (Ref. 314171-22) for the development of 345 no. residential units that ranges in height from 2-7. Upon completion, the development of the SDRA 11 lands will provide an integrated network of buildings, streets and open spaces which in turn link to the adjoining neighbourhoods.
- 8.198 The Infrastructure Report prepared by AECOM sets out the servicing arrangements for the development. The Energy and Sustainability Report details district heating compatibility.
- 8.199 Waste management facilities are suitably located within the footprint of the development and within carefully designed structures to integrate with the visual appearance of the development.

#### *Sustainable Height and Density*

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

- *The potential contribution to the development of new homes, economic growth and regeneration in line with the compact urban growth principles set out in the NPF and Project Ireland 2040.*
- *Proximity to high quality public transport connectivity, including key public transport interchanges or nodes.*
- *Proximity to a range of employment, services and facilities.*
- *Provision of adequate social and community infrastructure.*
- *The availability of good walking, cycling and public transport infrastructure.*

- *Appropriate mix of uses, housing typologies and tenures.*
  - *The provision of high quality public open space and public amenities.*
  - *The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.*
  - *That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed.*
  - *Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character.*
  - *Adequate infrastructural capacity”*
- 8.200 As set out within Section 6.0 of the Planning Report prepared by JSA, the proposed development supports the objectives of the NPF, the RSES and other national policy guideline which aim to achieve compact urban growth principles.
- 8.201 As set out in the TTA prepared by AECOM the proposed development is adjacent to high quality public transport connectivity along the Cork Street and close to the Luas Green Line.
- 8.202 Significant employment and service areas in the area include The Coombe Women & Infants University Hospital, St James’ Gate Enterprise Centre, the Digital Hub and close to Dublin City Centre.
- 8.203 As set out within the JSA Community and Social Audit there is a good provision social and community infrastructure to support the development. the proposal makes a contribution in this regard through the provision of a community facility.
- 8.204 The existing provision of walking, cycling and public transport infrastructure is set out within the TTA prepared by AECOM. Significant contributions are also made to this infrastructure by the proposed development.
- 8.205 High quality public open space and public amenities proposed are set out in the Architectural and Landscape design statements and associated documentation.
- 8.206 Please see Risk Management Chapter 14 of the EIAR chapters including and the SSFRA prepared by AECOM for further detail in regard to the resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.
- 8.207 The ecological and environmental sensitivities of the receiving environments have been comprehensively assessed and addressed as part of the EIAR and NIS, and other enclosed documentation.
- 8.208 An appropriate design response that considers the characteristics of the site, any development constraints and prevailing character has been set out within the Architectural and Landscape design statements and associated documentation.
- 8.209 Adequate infrastructural capacity has been assessed as part of the EIAR and other enclosed documentation such as the EPR prepared by AECOM and the TTA prepared by AECOM.
- 8.210 The proposed development has been designed to align with the Guiding Principles for SDRA 11 as set out in the Development Plan.

Architectural Design Statements

*“Information requirements for Design Statements*

- *Site Location and Description*
- *Context and Setting*
- *Urban Design Rationale*
- *Design Evolution / Alternatives Considered*
- *Block Layout and Design*
- *Site Connectivity and Permeability*
- *Height, Scale and Massing*
- *Materials and Finishes*
- *Open Spaces (Private, Communal, Public)*
- *Public Realm Contribution*
- *Compliance with Internal Design Standards*
- *Daylight and Sunlight*
- *Overlooking, Overbearing, Overshadowing*
- *Car and Cycle Parking*
- *Management/ Lifecycle Report*
- *Compliance with DMURS*
- *Safety and Security*
- *Universal Access*

8.211 In response to the above considerations, please see the detailed documentation contained within the application in particular the following documentation prepared by the design team:

- Landscape Design Report prepared by AECOM.
- Daylight and Sunlight Assessment Report by 3DDB
- Chapter 10 of the EIAR ‘Townscape and Visual Impact’ prepared by AECOM
- TTA prepared by AECOM
- Architectural Design Statement prepared by MW
- Building Lifecycle Report prepared by MW
- HQA prepared by MW

8.212 An Architectural Design Statement containing the above requirements has been prepared by MW and is submitted with this application which addresses the above majority considerations.

Models and Photomontages

*“In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted.”*

8.213 Photomontages of the proposed development have been prepared by MW Architects and Certified Views by Innovision and are submitted with this application.

**Green Infrastructure and Landscaping**



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

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

8.214 A Landscape Design Statement has been prepared by AECOM which details the landscape plans for the proposed development and outlines planting and landscaping proposals are incorporated into landscape plans. This document also refers to the Draft Dublin City Biodiversity Action Plan 2021 – 2025. Please also see Natura Impact Assessment and AA Screening prepared by Altamar in regard to Habitats Directive considerations.

#### Green Infrastructure

*“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”*

8.215 In response to the above, the proposed development will expand and improve the connectivity of the Green Infrastructure network in Dublin City and biodiversity

enhancement through the use of green roofs, green walls, various types of planting in open space areas and other SuDS features.

### Surface Water Management and SuDS

*“All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council’s Surface Water Management Guidance. All new developments will also be required to utilise SuDS measures in accordance with Policy SI22 of the development plan*

#### *SuDS Requirement 1 - Runoff Destination*

*The following methods of utilising or releasing rainfall run-off from development are set out in order of preference:*

- 1. Use surface water run-off as a resource.*
- 2. Provide interception of rainfall through the use of nature based SuDS approaches.*
- 3. Where appropriate, infiltrate run-off into the ground.*
- 4. Discharge to an open surface water drainage system. Discharge to a piped surface water drainage system.*
- 5. Discharge to a combined sewer.*

*Discharging run-off from a site may utilise one or more means of discharge. Full advantage should be taken of each method of discharge on the list in turn, prior to considering the next sequential option.*

#### *SuDS Requirement 2 - Hydraulic Control*

*Hydraulic criteria are as set out in the GDSDS and Regional Drainage Code of Practice. Surface run-off from new development will be restricted to 2 l/s/ha for the 1 in 100 year rainfall event (with allowance for climate change and urban creep) where surface water leaving the site:*

- poses a pollution risk to the environment arising from (overflow from a combined sewer to a receiving watercourse);*
- has the potential to impact upon property or infrastructure (where property or infrastructure is identified as being at flood risk from a 1 in 100 year flood / rainfall event)*

*In all other instances, the following criterion tabled below shall apply.*

#### *SuDS Requirement 3 - Water Quality*

*SuDS designs will demonstrate sufficient number of SuDS techniques which are sufficiently sized to manage and remove pollution, to provide protection of groundwater, surface waters and sensitive coastal waters. The SuDS design will demonstrate that water is suitably cleansed prior to entry to SuDS components that are intended for amenity use and biodiversity benefit. Preference should be given to SuDS techniques which generate interception losses.*

*SuDS Requirement 4 - Amenity*

*Designs should seek to generate amenity benefits using SuDS, through the creation of multi-functional places and landscapes.*

*SuDS Requirement 5 - Biodiversity*

*Designs should seek to generate biodiversity benefits using SuDS”*

- 8.216 The proposed development includes various amenity benefits from SuDS features including green roofs and green spaces. As set out in AECOM Infrastructure Report:

*“The SuDS features included are as follows:*

- Extensive Green Roof;*
- Intensive Green Roof;*
- Permeable Paving on Roof Terrace;*
- Swales;*
- Tree pits;*
- Porous asphalt;*
- Bio-Retention / Rain Gardens;”*

- 8.217 Compliance with Greater Dublin Strategic Drainage Study is set out in Section 4.6 of the Engineering Infrastructure Report. The SuDS strategy is set out in Section 2.7 of the Landscape Design Statement.

***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.”*

8.218 A Landscape Design Statement has been prepared by AECOM. A detailed response to the above considerations are set out within the Landscape Design Statement and associated drawings prepared by AECOM, in summary the key design drivers of this strategy include the following:

- Open Space Strategy
- Effective Access and Circulation
- Integrated Infrastructure
- Softworks & Biodiversity Strategy
- Spatial Typologies
- Communal Amenity
- Green Infrastructure
- Utility Strategy
- A New Urban Grain



**Figure 8.6: Extract of landscape strategy (Source: AECOM, 2022).**

8.219 The following diagram illustrates the SuDS strategy which is to be incorporated within the landscape proposals, more specific information on each individual SuDS typology in AECOM Landscape documentation.





**Figure 8.7: extract of SuDS strategy details in the Landscape Design Statement (Source: AECOM, 2022).**

8.220 In terms of tree strategy, AECOM state:

- *“Proposed Tree species will vary depending on the design intent and location*
- *The Street and Amenity Trees species will be urban street trees which are proven to be robust*
- *The Amenity Trees will be larger*
- *The Podium Trees will need to be robust as well as shade and wind tolerant. Engagement with the civil engineering team will be required to minimise any constraints to tree planting. Mitigation measures against wind from tall building downdrafts will also need to be considered.”*



**Figure 8.8: extract of tree and planting strategy (Source: AECOM, 2022).**

### **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.”*

8.221 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 Section 3 of this Report and the Landscape Design Statement and drawings prepared by AECOM.

8.222 A comprehensive Daylight and Sunlight Assessment Report has been prepared by 3DDB which assesses the level of daylight and sunlight received within the space in accordance with the BRE Guidelines or any other supplementary guidance documents.

8.223 The proposed development accords with Section 16.3.4 in relation to Public Open Space. A total of 3,408 sqm of public open space is proposed, which equates to c.

16.64% of the 2.05-hectare NDA, thereby meeting and exceeding the 10% requirement specifically for residential schemes.

- 8.224 Please see detail above in regard to proposed SuDS and set out in further detail within the Infrastructure Report . Permeable services are included where possible. The rationale, design and layout of the open space has been set out within AECOM Landscape Design Report, proposed open spaces.

***“Climate Action and Energy Statement***

*New developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.*

*The statement, which shall be prepared by a certified engineer, shall address:*

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

*Where it is not feasible for a development to be district heat enabled, the statement must provide a clear explanation as to why this is would not be the case, and must also demonstrate that the proposed development offers a similarly efficient and low carbon energy and heating solution.*

- 8.225 In response to the above requirement An Energy and Sustainability Report has been prepared by AECOM which sets out a response to the above including passive energy reduction, embodied energy considerations, design efficiency, renewable energy, heat recovery, passive energy reduction, centralised systems and renewable The centralised heating system proposed will allow future connection to district and/or waste heat networks.

***“Community and Social Audit***

*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.”*

8.226 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 community facility has been proposed as part of the proposed development.

### **Schools**

*“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”*

8.227 A school demand assessment has been prepared as part of the Community and Social Audit prepared by JSA.

### **“Childcare**

*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.”*

- 8.228 The proposed development will provide for a creche facility of 664 sqm plus playground of 225 sqm. which is capable of accommodating the childcare needs of the residents of the proposed residential scheme. Please see Community and Social Audit for further details.

### **Public Open Spaces**

**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%

- 8.229 The proposed development will provide for 3408 sqm of public open space (as detailed in the Architectural Design Statement) which is in excess of the required 10% (16.6% provided).

### **“Dual Aspect**

*Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations.”*

- 8.230 The apartment guidelines state that a minimum of 50% dual aspect apartments should be provided in any development and that a minimum of 33% dual aspect units should be provided in 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.
- 8.231 The proposed development provides for an overall of 45% 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 MW is submitted as part of this application which demonstrates compliance with the applicable standards.

***“Microclimate – Daylight and Sunlight, Wind and Noise******Daylight and Sunlight:***

*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”*

- 8.232 A Daylight and Sunlight Assessment Report has been prepared by 3DDB in accordance with the requirements of BRE209 as set out in the executive summary of this report:

*“It is the expert opinion of 3D Design Bureau, that the BRE Guidelines (BRE 209) are the most appropriate guiding document for daylight and sunlight assessment, as such BRE 209 will be the primary reference document for all primary studies carried out for this report. For daylight within proposed developments, a supplementary study has been carried out under the criteria of I.S. EN 17037.”*

- 8.233 In relation to scheme performance 3DDB stated that:

*“As stated and explained in detail within this report, significant work has been done with the design team to ensure acceptable levels of compliance were achieved, in particular with regard to scheme performance. The compliance rate of circa 80%-81% for SDA, with the permitted/submitted schemes in play (circa 87%-88% without them in play), should be considered very favourable, and in excess of compliance rates in other schemes within the SDRA 11, which have been permitted. Similarly the SE performance has also improved due to design changes and emphasis on dual and triple aspect units.*

*The sun on ground measured on the open amenity areas, internal courtyards and the rooftops show a high level of compliance where future occupants can expect to enjoy good levels of daylight.”*

***Wind:***

*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.”*

- 8.234 A Microclimate Effects on Wind And Pedestrian Comfort assessment has been carried out by B-fluid which concludes:

*“Wind cannot be eliminated or totally mitigated as it depends on weather conditions which could vary. The data of the historical wind conditions collected and reported in the previous sections, show that the wind speeds likely to occur on the Proposed Development site are below critical values and that pleasant and comfortable microclimate can be maintained for most of the time and under the most frequent wind scenarios...”*

*“Having considered the above, no further changes to the development design and further increasing of the landscaping is suggested, as safety and pedestrian comfort is maintained in accordance with Lawson Comfort and Distress Criteria. .”*

### **“Separation Distance (Apartments)”**

*Traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Separation distances between buildings will be assessed on a case by case basis. In all instances where the minimum separation distances are not met, each development will be assessed on a case by case basis having regard to the specific site constraints and the ability to comply with other standards set out within this chapter in terms of residential quality and amenity.*

### **“Overlooking and Overbearance**

*Overlooking may be overcome by a variety of design tools, such as:*

- Building configurations (bulk and massing).*
- Elevational design / window placement.*
- Using oblique windows.*
- Using architectural features.*
- Landscape and boundary treatments.”*

8.235 The proposed development provides for adequate separation distances on site with the 22m separation distance between proposed apartment buildings achieved at a number of locations. Appropriate separation distances are proposed between the existing residential units to the north.

8.236 As set out in the MW ADS:

*“Set back distances between DCC1 and the houses on Margaret Kennedy Road are in excess of 22m therefore overlooking is not deemed to be an issue. In consideration for potential overbearance, DCC1 has been lowered to 6 stories at it’s northern edge to respect the opposing 3 storey housing. Proposed blocks DCC5 and DCC6 have been designed with consideration for the extant Hines Bailey Gibson and Player Wills Permissions (ref. ABP-307221-20 & ABP-308917-20) , and the southern edges of these blocks are 2 stories in height in response to the potential issue of overlooking an overbearance.”*

*“The impact assessment that was carried out for the purpose of 3DDB Sunlight Daylight report has studied the potential levels of effect to the surrounding existing environment and/or properties would sustain in the above states.”*

8.237 The design of the scheme ensures that there is no undue overlooking into adjacent properties occurs through its orientation, fenestration and use of architectural features. The block layout, height and massing of the buildings has been carefully assess over the course of a series of design iterations to ensure impact on surrounding uses are avoided as much as possible.



### ***“Flood Risk Management***

*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.”*

- 8.238 The site of the proposed development has been subject to a Site Specific Flood Risk Assessment prepared by AECOM. As part of the SFRA, the site was assessed for tidal/coastal flooding, pluvial, fluvial, groundwater and infrastructure flooding sources and the SFRA confirms that *“the site passes the justification test.”*

### Appendix 3: Achieving Sustainable Compact Growth Policy for Density and Building Height in the City

#### Plot Ratio and Site Coverage

- 8.239 The Development Plan in Appendix 3 sets out the indicative ranges for plot ratio and site coverage for various areas in the city. Within regeneration areas the indicative plot ratio is 1.0-3.0 and the indicative site coverage is 50-60%. The plot ratio of the proposed development is 2.60 and the site coverage of the proposed development is 46.9%. The proposed development is therefore broadly in line with the indicative plot ratio and site coverage set out in the Development Plan.

#### Building Height

- 8.240 The proposed development is located within SDRA 11, and the provision of additional height and density at this location is considered appropriate, in line with the provisions of national, regional and local policy, including the Guiding Principles for SDRA 11 as set out in the Development Plan and all relevant Section 28 Guidelines. The proposed development is of a high-quality architectural design and will provide for much needed housing.
- 8.241 Appendix 3 of the Development Plan in sets out the key criteria against which all proposals for buildings of increased height and scale are to be considered. These are as follows:

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

- *Proximity to high quality public transport connectivity, including key public transport interchanges or nodes.*

- *Proximity to a range of employment, services and facilities.*
  - *Provision of adequate social and community infrastructure.*
  - *The availability of good walking, cycling and public transport infrastructure.*
  - *Appropriate mix of uses, housing typologies and tenures.*
  - *The provision of high quality public open space and public amenities.*
  - *The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.*
  - *That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed.*
  - *Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character.*
  - *Adequate infrastructural capacity.”*
- 8.242 The proposed development will result in the construction of 543 no. residential apartments in a highly accessible location, within a defined regeneration area. The proposed development accords with the principles of compact growth and consolidation of the city as set out in the NPF.
- 8.243 The proposed development is located in close proximity to existing and proposed public transport links, including the Luas stop at Fatima, and the Cork Street bus corridor, which is proposed to be improved as part of the BusConnects bus network redesign. The proposed development is also located close to the cycling infrastructure at the Grand Canal.
- 8.244 The existing site is located in the central area of the city, and a wide variety of services, employment opportunities, and facilities are located within a short walking, cycling, or public transport distance.
- 8.245 The proposed development will have access to a range of social and community infrastructure, including the proposed community uses and municipal playing pitch within the SDRA itself. The full details of the social and community infrastructure in the area are set out in the Community and Social Audit accompanying this application.
- 8.246 The site is located in a highly accessible part of the city, and the proposed development will retain this access. The site has access to public transport services on the Luas Red Line and Cork Street bus corridor and is within walking distance of the city centre. The proposed development will encourage the use of sustainable transport modes through the provision of adequate cycle parking and enhanced access through the site to public transport routes.
- 8.247 The proposed development incorporates a variety of housing types and tenures, including one-, two-, and three-bedroom apartments, and social and cost rental apartments. The proposed housing types and tenures will add to the variety and choice of housing in the area.
- 8.248 The proposed development incorporates the provision of public open space, along with amenities including a retail/café unit, mobility hub and community, artist workspace, arts and cultural space, including a creche.
- 8.249 The proposed development is to be compliant with all applicable standards in terms of access and egress. The design of the proposed development is such that emergency access and egress can be facilitated as necessary during emergency events, as fully assessed within Risk Management Chapter of the EIAR.

- 8.250 An EIAR has been submitted with this application as the proposed development meets the threshold for mandatory EIA. The EIAR sets out the likely significant effects of the proposed development on the receiving environment.
- 8.251 The proposed development has been designed to respond to the existing and emerging character of the area. The architectural design of the proposed buildings is of a high quality and will add interest and variety to the area.
- 8.252 The application is accompanied by a Confirmation of Feasibility and a from Irish Water, which sets out that the existing infrastructure can accommodate the proposed development.

Response to Table 3

- 8.253 We have set out a response to the Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale, as included within table 3 below:

***“1. To promote development with a sense of place and character enhanced density and scale should:***

- *respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,*
- *have a positive impact on the local community and environment and contribute to ‘healthy placemaking’,*
- *create a distinctive design and add to and enhance the quality design of the area,*
- *be appropriately located in highly accessible places of greater activity and land use intensity,*
- *have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area,*
- *not be monolithic and should have a well- considered design response that avoids long slab blocks,*
- *ensure that set back floors are appropriately scaled and designed.”*

- 8.254 The site represents an under-utilised site in a central location with an excellent opportunity to provide quality mixed development scheme. The design for the scheme provides increased permeability and connectivity within this urban block through the introduction of pedestrian streets and open spaces as part of the proposed development. The proposed development is of high-quality design and comprises a palette of materials that promote its uniqueness and identity while responding to the existing context.

- 8.255 In order to create a sense of place MW ADS states:

*“The scheme aims to create a new residential neighbourhood. As indicated previously, whilst this is primarily an urban scheme, a series of high-quality, well proportioned, streets and spaces are provided, with appropriate soft landscaping. The scheme’s street network and legibility, populated with active uses at ground floor level, is underpinned by recognisable features such as the tower element located at the confluence of routes, acting as a discernible focal point to the scheme.*

*“The buildings within this development will have common characteristics intended to offer identity to scheme such as the two-storey plinth, brickwork detailing around building lobbies and entrances, colonnades around key corners, parapet and crown detailing etc.”*

8.256 Details of the planting, the quality of the public realm and green infrastructure report are set out in the Landscape Design Statement prepared by AECOM. The orientation and the accessibility to daylight and sunlight. The suitability and quality of the public realm is also set out in this report. Public areas are designed to be accessible and attractive to a wide variety of individuals with mobility needs. More generally the development is designed to encourage walking and cycling. A safety and security statement (Section 5.14) is also set out within the Architectural Design Statement prepared by MW.

8.257 The proposed development primarily comprises blocks of 6-7 storeys with a single 15 storey portion. The design team has worked carefully to ensure the proposal integrates with the existing surrounding context, which comprises a wide variety of uses and scales; and the permitted / potential development in the area.

8.258 MW provide the following vision for the development:

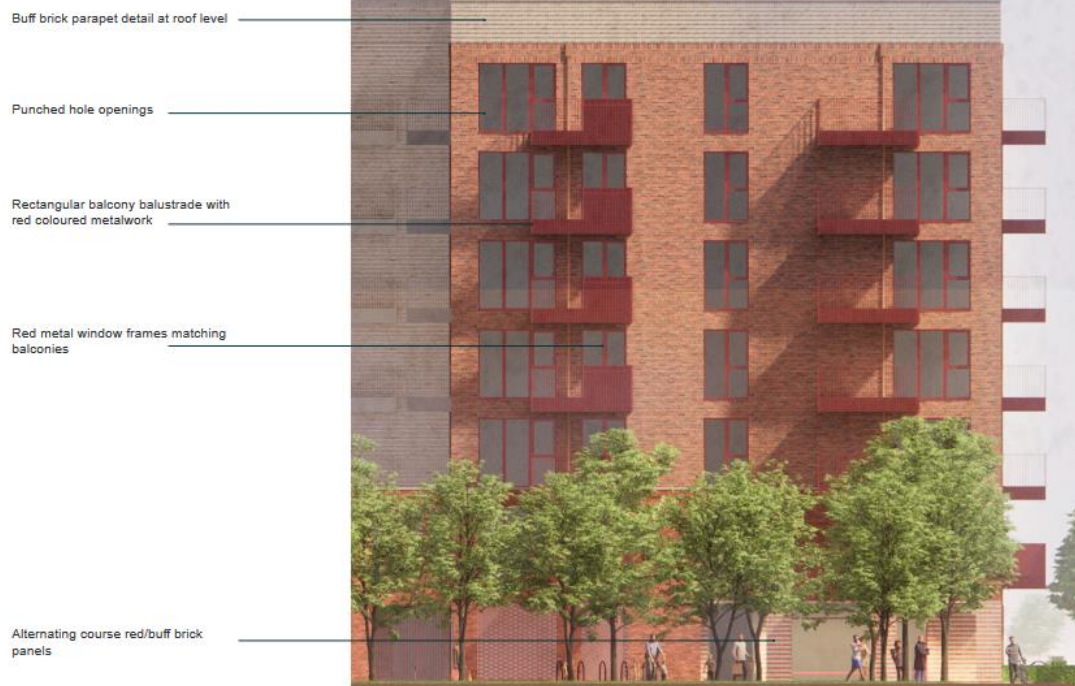
*“The proposed site offers a distinct opportunity to develop a vibrant, sustainable and compact residential neighbourhood. which is well connected and supports the social, economic, and cultural well-being of the Donore area.*

*“At the heart of this vision is the desire to create an inclusive and integrated community with high quality sustainable homes and supporting amenities, set in an attractive public realm with a network of links to enhance well-being and integration with the surrounding community.*

8.259 A key aspect of this vision is ‘integrating’:

*“The Donore Project site is centrally located in Dublin City and within a long-established community. This offers the opportunity to connect, integrate and contribute to the vibrancy of the local community and beyond with new residential development providing homes into an established and expanding community.*





**Figure 8.9: selection of finishes and materials chosen. (Source: MW, 2022).**

8.260 As set out in the MW Design Statement:

*“The massing has been developed through a series of meetings with DCC Planning and in response to consultation feedback. The current massing broadly aligns with the guiding principles for SDRA 11 set out in the Dublin City Development Plan which proposes the majority of building heights between 6 and 8 storeys, with one mid rise building proposed to the southwest of DCC3. Through discussion with DCC and in response to proposals for Hines Bailey Gibson 1 application Ref. ABP- 307221-20, 1 and 2 storey elements are proposed to the south DCC3 and DCC5 and a single story podium car parks have been introduced to DCC1, DCC3 and DCC5. The lower 1 and 2 storey elements to DCC3 and DCC5 provide improved sunlight to the first floor residential communal spaces and to the dwellings themselves.”*

***“To provide appropriate legibility enhanced density and scale should:***

- *make a positive contribution to legibility in an area in a cohesive manner,*
- *reflect and reinforce the role and function of streets and places and enhance permeability.”*

8.261 The proposal will make a significant, positive contribution to permeability and connections through the area through high quality public realm in the area, particularly with the delivery of the public open space.

8.262 As set out in the MW Design Statement:

*“The development aims to create a highly accessible neighbourhood, using different modes of sustainable transport and will focus on pedestrian and cycle accessibility.*

*The proposed site, along with development of the adjacent SDRA 11 lands, will include a highly permeable network of streets that will focus on pedestrian and cycle accessibility. The plans on the right detail how these different modes will sit in the context of the SDRA 11 Framework lands.”*

- 8.263 MW also state that Landscape elements and tree planting - selected to complement the existing surroundings, enhance biodiversity, create a unique character and improve legibility.
- 8.264 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 surrounding street layout at Donore Avenue / Margaret Kennedy Road as well as will permitted development at Player Wills and Bailey Gibson sites

***“To provide appropriate continuity and enclosure of streets and spaces enhanced density and scale should:***

- enhance the urban design context for public spaces and key thoroughfares,*
- provide appropriate level of enclosure to streets and spaces,*
- not produce canyons of excessive scale and overbearing of streets and spaces,*
- generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,*
- provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.”*

- 8.265 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 open space at Donore Project Park. As set out in the MW ADS:

*“The development has high degree of passive surveillance of the streets and associated spaces. Block DCC3 will provided passive surveillance of the Donore Project park to the west and Players Park to the south. Likewise DCC5 will provide passive surveillance to the Donore Project park to the east. DCC 1 has been designed to overlook the new sports pitch (to be delivered by Hines)...*

*“Public spaces are all clearly defined. Where appropriate, street level private open space is provided with a planted privacy buffer from the street.”*

- 8.266 The communal open spaces are framed by blocks of varying heights which reduces the massing and scale, and also allowing for the penetration of sunlight/daylight into the spaces.
- 8.267 The proposal has varied its massing, concentrating the taller element away from the existing residential dwellings to the north, yet providing for a strong urban edge, appropriate enclosure and active frontage to public 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.

8.268 The communal open spaces will benefit from passive surveillance from apartments within the scheme. Additionally, the proposed landscaping will foster safe and secure outdoor spaces within the proposed development. A lighting & CCTV scheme will ensure that this sense of security will be maintained throughout the evening. The community space, crèche and retail units have been located at the public plaza to ensure that there is a sense of activity and security throughout the day. Likewise, the resident's amenity space has been placed at a convenient ground floor location to ensure that it is well used and monitored. The main entrances to the blocks have been grouped around the courtyards and entrances have been carefully designed to ensure that residents & guests have shelter and light as they enter and leave their homes.

8.269 In terms of active frontage, MW state:

*"The active frontages are provided by a number of uses, including a crèche, concierge office, retail/café spaces, community uses and access points to private residential properties (in the form of communal lobbies and own door apartments onto the street)."*

***"4.To provide well connected, high quality and active public and communal spaces enhanced density and scale should:***

- *integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport,*
- *be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,*
- *ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16,*
- *ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development,*
- *ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated,*
- *Provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability."*

8.270 The proposed development will improve the legibility of the area, which is predominantly brownfield at present. The proposed heights across the site are appropriately located and designed to provide a positive response to the site and surrounding context in respect of nearby existing and proposed building heights. The height varies for each block, and they are appropriately stepped particularly from the south and set back from neighbouring properties to ensure they can be integrated into the wider area in a cohesive manner.

8.271 As set out in MW Design Statement:

*"The site is ideally located to link the surrounding context and future developments with a predominantly pedestrian and bicycle strategy. Donore Project Park is at the heart of this strategy and will enjoy active use with a welcoming aesthetic, while linking the Players Park (to the south of DCC3) and the sports pitch to the north.*

*"The interconnectivity ensures that every public space within the design proposal is easily accessible.*

*“A new urban grain within the site boundary provides vehicular routes at the edges, cementing the hierarchy of pedestrian movement and more sustainable connectivity.*

*“Cars are brought into the parking podiums as quickly as possible upon entering the site. Resident courtyards are provided above the parking podiums.”*

8.272 The proposed site layout has been developed with consideration for adjacent SDRA11 lands and associated extant permissions at Hines Phase 1 Bailey Gibson permitted under application Ref. ABP-307221-20 and Hines Player Wills permitted under Ref. ABP-308917-20 (both subject to Judicial Review). We also note CWTC Multi Family ICAV have recently submitted a Strategic Housing Development Application (Ref. 314171-22) for the development of 345 no. residential units that ranges in height from 2-7. Upon completion, the development of the SDRA 11 lands will provide an integrated network of buildings, streets and open spaces which in turn link to the adjoining neighbourhoods.

8.273 The proposed new public plaza and public realm improvements will complete the pedestrian facilities in the complex and help to further integrate the Donore Project into the surrounding community. A strategy on safety and security is included with the MW Design Statement which relates to the following key areas:

Passive Surveillance & Active Frontage  
Landscape Boundary Treatments & Materiality  
Lighting  
Roads & Traffic

8.274 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. The landscape strategy creates a number of distinct public and communal spaces. Further details are set out in the Landscape Design Statement, including the proposed hard and soft landscaping. The proposed development is considered to be fully compliant with the provisions of “The Planning System and Flood Risk Management” (2009), and this is set out in the accompanying Site-Specific Flood Risk assessment prepared by AECOM.

8.275 As set out in the Landscape Design Report prepared by AECOM:

*“The site plan has been developed with a well-proportioned central public open space in mind. The varied neighbourhood orientations will create interest along the interfaces of the scheme and minimum widths have been considered in order to provide suitably proportioned spaces. The proposals include the provision of the following:*

- Public realm.*
- Public open space (including informal play).*
- Semi-private/communal open space.*
- Private balconies.*

*The variety of spatial typologies provision will ensure that all aspects of life are catered for in order to meet the needs of the residents and create a new dynamic community”*





**Figure 8.10: extract from AECOM Landscape Design Statement (Source: AECOM, 2022).**

***“5.To provide high quality, attractive and useable private spaces enhanced density and scale should:***

- *not compromise the provision of high quality private outdoor space,*
- *ensure that private space is usable, safe, accessible and inviting,*
- *ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16,*
- *assess the microclimatic effects to mitigate*
- *and avoid negative impacts,*
- *retain reasonable levels of overlooking and privacy in residential and mixed use development*

8.276 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 (please see MW HQA for details of same). Private open spaces are suitably arranged and designed to provide usable, safe, accessible and inviting space.



**Figure 8.11: example of ground floor private amenity spaces. (Source: AECOM, 2022).**

8.277 The site layout has been developed to avoid blank façades and encourage overlooking to all areas. Ground level façades are activated through a mix of own-door access homes, access to communal entrance lobbies, and access to the crèche, artist work space, cultural space and the mobility hub.

8.278 Above street level, façades are activated with private amenity balconies providing passive surveillance of ground and podium level public and communal spaces, as well as entrances, both communal and private. Shrubs and Trees have been selected to avoid obscuring of lighting or pedestrian routes. Considered boundary treatments use planting and materiality to provide a clear distinction between private, communal and public space. Lighting design has been developed to provide appropriate lighting levels across the proposed site.

8.279 As set out within the MW ADS, the design team have taken great care in ensuring that the residential amenities of the neighbouring houses will not be negatively impacted by the proposal. This has been assessed throughout the scheme design by 3DDB.

8.280 As set out in the 3DDB Sunlight Daylight Assessment which has assessed outdoor amenity areas:

*"The sun on ground measured on the open amenity areas, internal courtyards and the rooftops show a high level of compliance where future occupants can expect to enjoy good levels of daylight."*

8.281 A Microclimate Effects on Wind And Pedestrian Comfort assessment has been carried out by B-fluid which concludes:

*"Wind cannot be eliminated or totally mitigated as it depends on weather conditions which could vary. The data of the historical wind conditions collected and reported in*

*the previous sections, show that the wind speeds likely to occur on the Proposed Development site are below critical values and that pleasant and comfortable microclimate can be maintained for most of the time and under the most frequent wind scenarios...*

*“Having considered the above, no further changes to the development design and further increasing of the landscaping is suggested, as safety and pedestrian comfort is maintained in accordance with Lawson Comfort and Distress Criteria. .”*

***“6 To promote mix of use and diversity of activities enhanced density and scale should:***

- *promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure,*
- *contribute positively to the formation of a ‘sustainable urban neighbourhood’,*
- *include a mix of building and dwelling typologies in the neighbourhood,*
- *provide for residential development, with a range of housing typologies suited to different stages of the life cycle”*

8.282 While the scheme is primarily residential in nature, it is proposed to provide other uses including creche, artist workspace and cultural space and restaurant uses as well as a mobility hub concentrated in the centre of the site around the main public open space area, which will act as a focal point for the scheme and provide a seamless connection between the site and the proposed other main areas of open space within SDRA 11.

8.283 The scheme provides a mix of heights and building scales to provide visual interest and variety.

As set out in the MW Design Statement:

*“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).”*

8.284 In addition, the oversized units in our scheme, are designed with UD principles to the fore as set out in 6.02 of the MW Design Statement

8.285 The proposed development provides for a mix of 225 no. 1-bedroom apartments (41.4%), 274 no. 2-bedroom apartments (50.5%), and 44 no. 3-bedroom apartments (8.1%).

8.286 In addition, the scheme makes a significant contribution to housing in the area through the provision of mix of tenure types. This includes a 28% - 72 % split in tenure as follows: Social Housing of 28% and Cost Rental of 72%.

***“7 To ensure high quality and environmentally sustainable buildings enhanced density and scale should:***

- *be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16,*

- *not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain,*
- *ensure a degree of physical building adaptability as well as internal flexibility in design and layout,*
- *ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive,*
- *maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,*
- *be constructed of the highest quality materials and robust construction methodologies,*
- *incorporate appropriate sustainable technologies, be energy efficient and climate resilient,*
- ***{apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16).}***
- *incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SuDS solutions are in place – see Appendix 13,*
- *include a flood risk assessment - see SFRA Volume 7.*
- ***{include an assessment of embodied energy impacts – see Section 15.7.1}***

- 8.287 The proposed development has been carefully designed and orientated so as to maximise access to natural daylight for apartments and communal open areas, a high level of privacy is afforded to residents through careful organisation of windows and at ground floor level planting buffers.
- 8.288 A comprehensive Daylight Sunlight Assessment has been prepared by 3DDB has been prepared which assesses this and potential impact on surrounding sensitive uses.
- 8.289 Flexibility within the ground floor uses has been provided.
- 8.290 A high degree of dual aspect and triple aspect units are provided. A high degree of active street frontage is provided to public spaces in the form of non-residential uses and entrances.
- 8.291 High quality materials have been chosen for the proposed development which are robust and durable please see Building Lifecycle Report for specific detail in this regard.
- 8.292 The proposed development's passive heating and energy efficiency strategies are set out in AECOMs Energy and Sustainability Report along with other related considerations such as renewable energy, embodied energy and use of materials.
- 8.293 Surface Water Management is set out in AECOM's Infrastructure Report and Landscape Design Statement including a variety of SuDS as previously summarised within this report.
- 8.294 A Site Specific Flood Risk Assessment is enclosed and prepared by AECOM's.



***“8 To secure sustainable density, intensity at locations of high accessibility enhanced density and scale should:***

- *be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport,*
- *look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.”*

- 8.295 The subject site is situated within walking distance of existing high-quality bus and light rail services through Dublin City. This includes a number of bus routes within a 5-minute walk of the site. The site is within a 10-12 minute walking distance of Red Line Luas Stop at Fatima. It will also benefit from planned public transport upgrades, including Bus Connects which will serve Cork Street. There are 8 no. bus stops located within a 15 minute walking catchment of the site (Figure 8.12), the closest of which is within 4 minutes. These bus stops are operated by Dublin Bus. As part of the BusConnects scheme the current bus network is to be revised and more frequent and efficient services are to be provided across the Dublin environs. The subject site is within 300m of Corridor 9 (Greenhills to City Centre) and 1.1km of corridor 11 (Kimmage to City Centre) of the Bus Connects proposals.
- 8.296 Bus stops and services on South Circular Road, Hawkins Street and Cork Street were observed during the site visit which included bus observations on bus service no's. 122, 150, 151, 77A and 27 at a range of frequencies. The most frequent is the No. 27 which operates once every 10 minutes during peak hours.
- 8.297 AECOM have carried out an assessment of the capacity of bus services in the area concluding that contained within the Public Transport Capacity Assessment enclosed with this application, which concludes: *“that there is sufficient capacity on existing public transport services to cater for the level of forecast trip demand from the Donore development site.”*

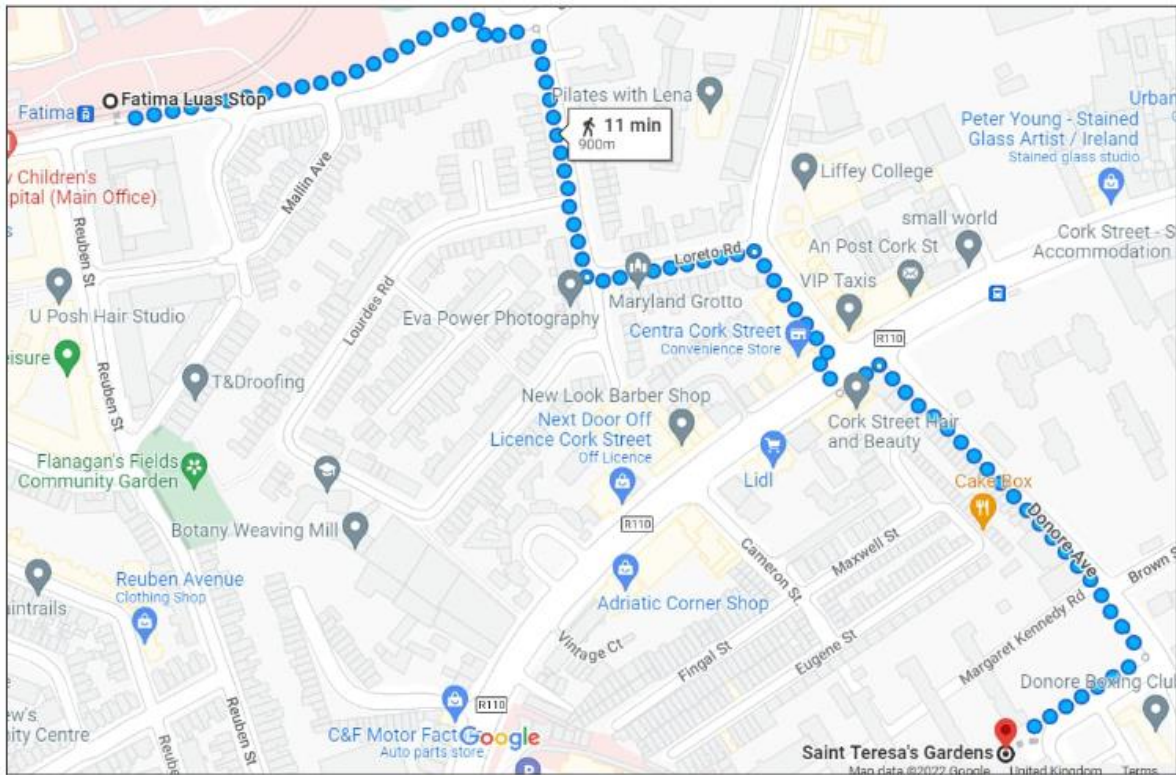


Figure 8.12: prepared by AECOM. (Source: AECOM TTA, 2022)

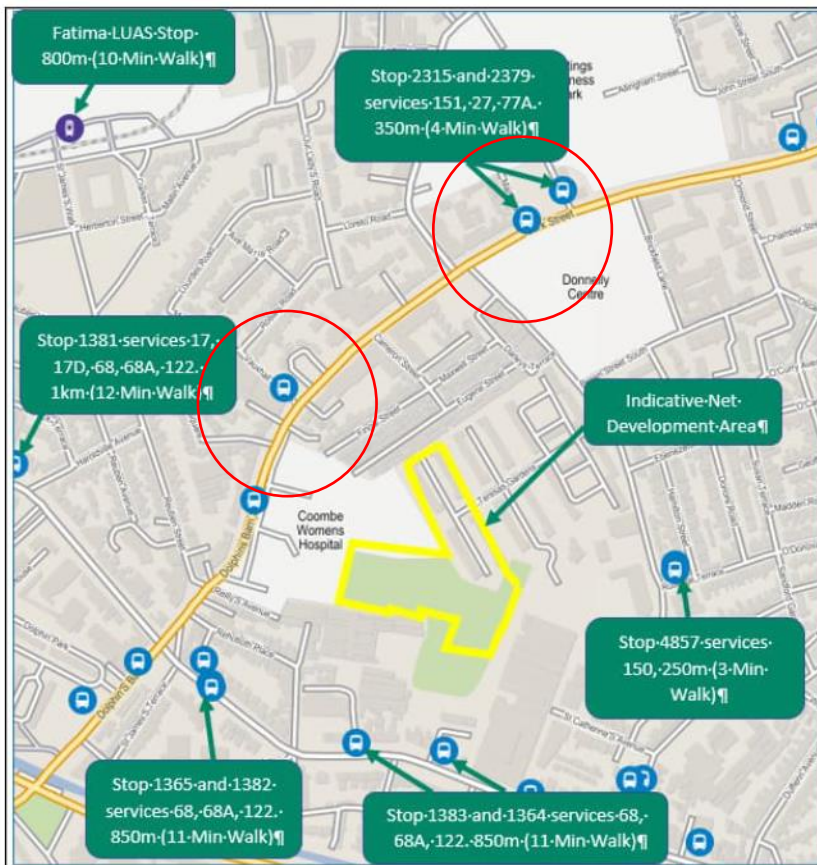


Figure 8.13: prepared by AECOM. (Source: AECOM TTA, 2022)

Table 2.1 Bus Services and Routing

Route	Operator	Distance to Proposed Development Site	Route	Services Am and PM Peak Hours		
				Monday to Friday	Saturday	Sunday
17	Dublin Bus	1km (12 min walk)	Rialto -Crumlin -Nutgrove - UCD- Blackrock	1 service every 20 mins	1 service every 20 mins	1 service every 20 mins
27	Dublin Bus	350m (4 min walk)	Jobstown – Blessington Road – Cork Street- Malahide Road	1 service every 10 mins	1 service every 10 mins	1 service every 15 mins
56A	Dublin Bus	350m (4 min walk)	Tallaght – Ballymount Road – St. Luke's Avenue- Ringsend road.	1 service every 1 hours and 15 mins	1 service every 1 hours and 15 mins	1 service every 1 hours and 15 mins
68	Dublin Bus	850m (11 min walk)	Hawkins Street – Dolphins Barn -Rialto – Bluebell- Clondalkin - Greenogue	1 service every 1 hour	1 service every 1 hour	1 service every 1 hours and 15 mins
77A	Dublin Bus	350m (4 min walk)	Citywest Road – Old Blessington Road – Cork Street – Ringsend Road	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
150	Dublin Bus	250m (3 min walk)	Hawkins Street – Patrick Street – Donore Avenue - Rossmore	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
151	Dublin Bus	350m (4 min walk)	Docklands (East Road)- Dolphins Barn – Parkwest - Foxborough	1 service every 20 mins	1 service every 20 mins	1 service every 30 mins
122	Dublin Bus	850m (11 min walk)	Drimnagh Road – Herberton Road – South Circular Road – Dorset Street – Ashington Park	1 service every 15 mins	1 service every 20 mins	1 service every 20 mins

**Figure 8.14: extract from TTA Bus Service and Routing (Source: AECOM, 2022).**

- 8.298 As part of the BusConnects scheme the current bus network is to be revised and more frequent and efficient services are to be provided across the Dublin environs. The subject site is within 300m of Corridor 9 (Greenhills to City Centre) and 1.1km of corridor 11 (Kimmage to City Centre) of the bus connects proposals corridor 9 route length is approximately 12kms. The current bus journey time is up to 80 mins and the proposed bus connects bus journey time is 30-40 mins.
- 8.299 In addition, there are shared mobility services available including GoCar, Yuko car sharing, and Dublin Bikes. Further details are set out in the Traffic Impact Assessment and the Mobility Management Plan prepared by AECOM.
- 8.300 Parking is principally provided at grade within a podium, with limited on-street parking. The provision of parking at podium and surrounded by a skin of active uses or residential accommodation allows for a high quality pedestrian environment to be created on street side. Parking at surface level occurs on-street and will benefit from passive surveillance both from residential units and from ground floor active uses, in addition to footfall on the streets. On-street parking is in designated bays with a surface material to match the palette of materials used for the streets.

***“9 To protect historic environments from insensitive development enhanced density and scale should:***

- not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below.*
- be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed,*

- *assess potential impacts on keys views and vistas related to the historic environment.*

8.301 The application is accompanied by an Architectural Design Statement prepared by MW Architects. This sets out the urban design rationale of the proposed development, including impacts on the historic built environment. The subject site is generally brownfield. There are no Protected Structures within the subject site, nor is it located within an Architectural Conservation Area Chapter 11 Archaeology & Cultural Heritage of the EIAR examines the potential impact of the development on the historic context.

***“10 To ensure appropriate management and maintenance enhanced density and scale should***

*Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.”*

8.302 The operational management plan is set out within the Building Lifecycle Report prepared by MW. An Operational Waste Management Plan has also been prepared by AECOM and is enclosed with the application.

**Density**

8.303 Sustainable densities promoting the highest quality of urban design and open space will be sought by DCC in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity.

8.304 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.

<b>Location</b>	<b>Net Density Range (units per ha)</b>
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

8.305 The proposed density of 264 units per hectare is marginally in excess of the density range of 100-250 units per hectare indicated in the Development Plan for SDRAs. The proposed scheme has been designed to have regard to the residential amenity of adjacent uses, whilst providing a high-density redevelopment on the subject site, and the design rationale for the proposed layout and relationship to adjoining uses is outlined further within the accompanying Architectural Design Statement. The provision of additional height and density at this location is considered appropriate, in line with the provisions of national, regional and local policy, including the Guiding Principles for SDRA 11 as set out in the Development Plan and all relevant Section 28 Guidelines. The proposed development is of a high-quality architectural design and will enhance the skyline of the area while providing for much needed housing.



## Plot Ratio & Site Coverage

8.306 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%

8.307 The proposed development has a plot ratio of 2.6 (based on 2.05 ha.) and a site coverage of c. 46.9%, which reflects the extensive areas of open space and communal areas for the proposed development.

8.308 The proposed development is within the plot ratio range and is marginally below the site coverage range, but these figures are indicative.

8.309 The proposed scheme represents a comprehensive response to the site context having regard to the residential amenity of adjacent uses, whilst providing a high-density redevelopment on the subject site. The overall design rationale for the proposed layout and relationship to adjoining uses is outlined further within the accompanying Architectural Design Statement. On this basis the site coverage and other design parameters are considered to be in accordance with the Development Plan.

## **9.0 CONCLUSION**

- 9.1 This Planning Report has been prepared by John Spain Associates in respect of a Section 175 application for a proposed residential development at the former St Teresa's Gardens, Donore Avenue, Dublin 8.
- 9.2 The proposed development represents the comprehensive regeneration of a c. 3.26 ha site in a highly accessible location in Dublin, providing for 543 no. cost rental and social housing apartments. The proposed development will also provide for a creche, public, private and communal open space, and other uses including a retail/café unit, mobility hub and of community, artist workspace, arts and cultural space, including a creche.
- 9.3 This report has set out how the proposed development is consistent with national, regional, and local policy as set out in the City Development Plan 2022-2028 including the Guiding Principles for the St Teresa's Gardens and Environs SDRA 11. It is submitted that the proposed development is of a sustainable scale and density and will provide for much needed housing in line with the principles of compact growth and sustainability.
- 9.4 It is considered, therefore, that the proposed development would be in the interest of the proper planning and sustainable development of the area, and it is respectfully requested that permission is granted in light of the considerations set out above.

## **APPENDIX 1: ASSESSMENT AGAINST 2016-2022 DUBLIN CITY DEVELOPMENT PLAN**

## Introduction

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 until the subsequent Development Plan comes into effect in December 2022. The following sets out and assesses the proposed development in relation to policies, objectives and standards of the Dublin City Development Plan (referred within to as the 'Development Plan').

## Core Strategy

Chapter 2 sets out the Vision and Core Strategy for the City, as follows: *"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 an adopted variation, part of the vision and core strategy of the Plan is to deliver over 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"*.

We also note Policy CSO 7: Promote Delivery of Residential Development and Compact Growth which states:

*"To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas."*

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."*

Z14 lands are specifically referenced in Table C of the Development Plan, clearly setting out significant lands allocated for residential use.

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 CDP 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.



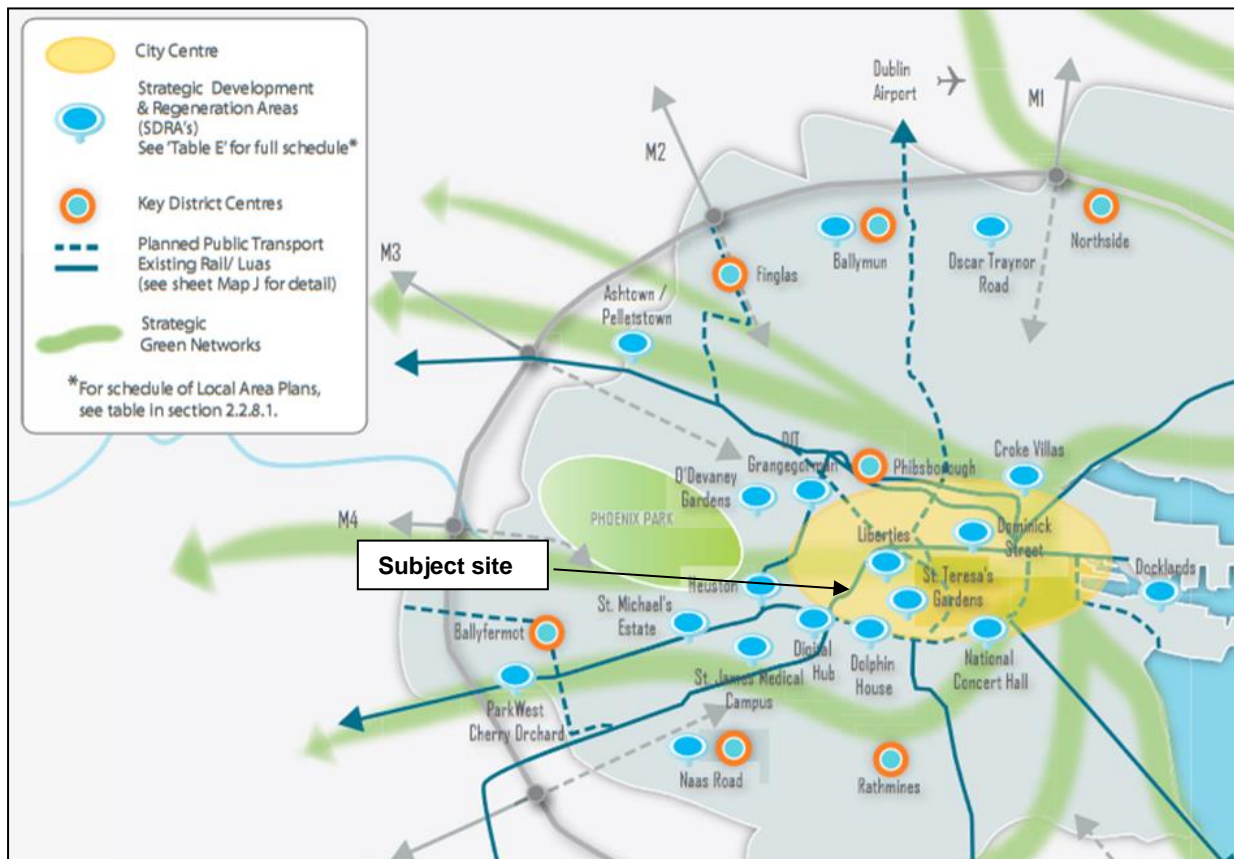


Figure 1 – Core Strategy Map from the 2016-2022 Development Plan

Table C - Core Strategy Figures.

Zoned in Dublin City Development Plan 2011–2017 for residential use or a mix of residential and other uses (includes adopted variations/amendments)	Size of area in hectares (includes previously developed areas)	Proposed no. of housing units to be included in the area
<b>Residential zonings: Z1+Z2</b> See 'Note 1' below table.	4466*	31,800 to meet population growth envisaged in Regional Planning Guidelines (rounded figure from Table 3.2 of Development Plan 2011–2017)
<b>Other zonings incorporating residential uses: Z3, Z4, Z5, Z8, Z10, Z12, Z14, and Z15 zonings.</b>	2043*	
	Total: 6509 hectares	
Re-zoned areas in Dublin City Development Plan 2016–2022 for residential use or a mix of residential and other uses	Size of rezoned area (hectares)	How zoning proposals accord with national policy that development takes place on a phased basis.
<b>New residential zonings: Z1+Z2</b>	26	See explanation set out in 'Compliance with phasing requirements' heading below.
<b>Other re-zonings incorporating residential uses: Z3, Z4, Z5, Z8, Z10, Z12, Z14, and Z15 zonings.</b>	21	
	Total: 47 hectares	

Figure 2: extract from Development table C Core Strategy

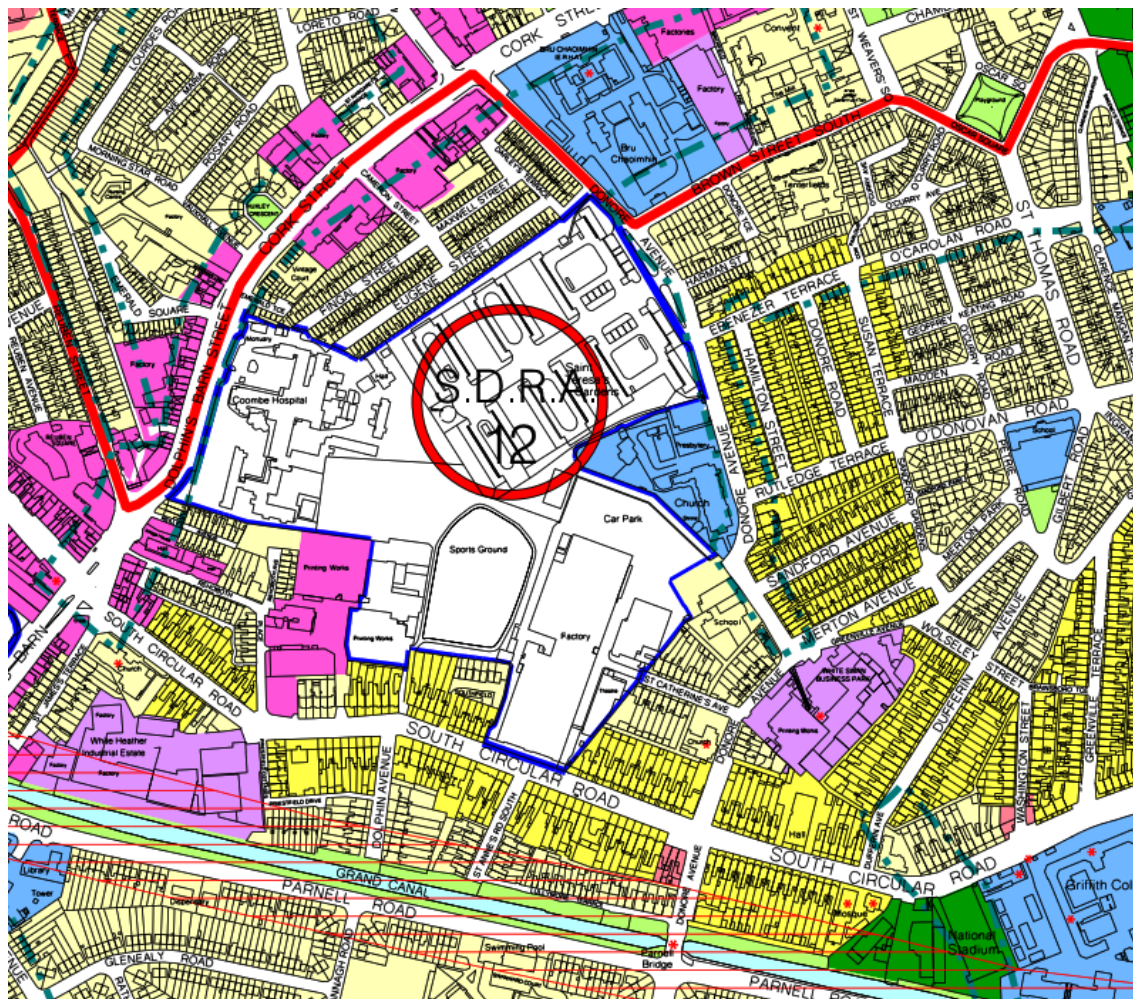
## Land-use Zoning

The site is zoned Z14 SDR4 under the Development Plan, with a zoning objective “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.”

Permissible uses include:

*“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 zoning matrix for Z14 zoned lands identifies the uses of residential, childcare and community facility and cultural buildings as “permissible”. The proposed development therefore complies with the zoning objective of the lands.



Zone Z14 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



**Figure 3: Land Use Zoning. Source: Dublin City Development Plan 2016-2022.**



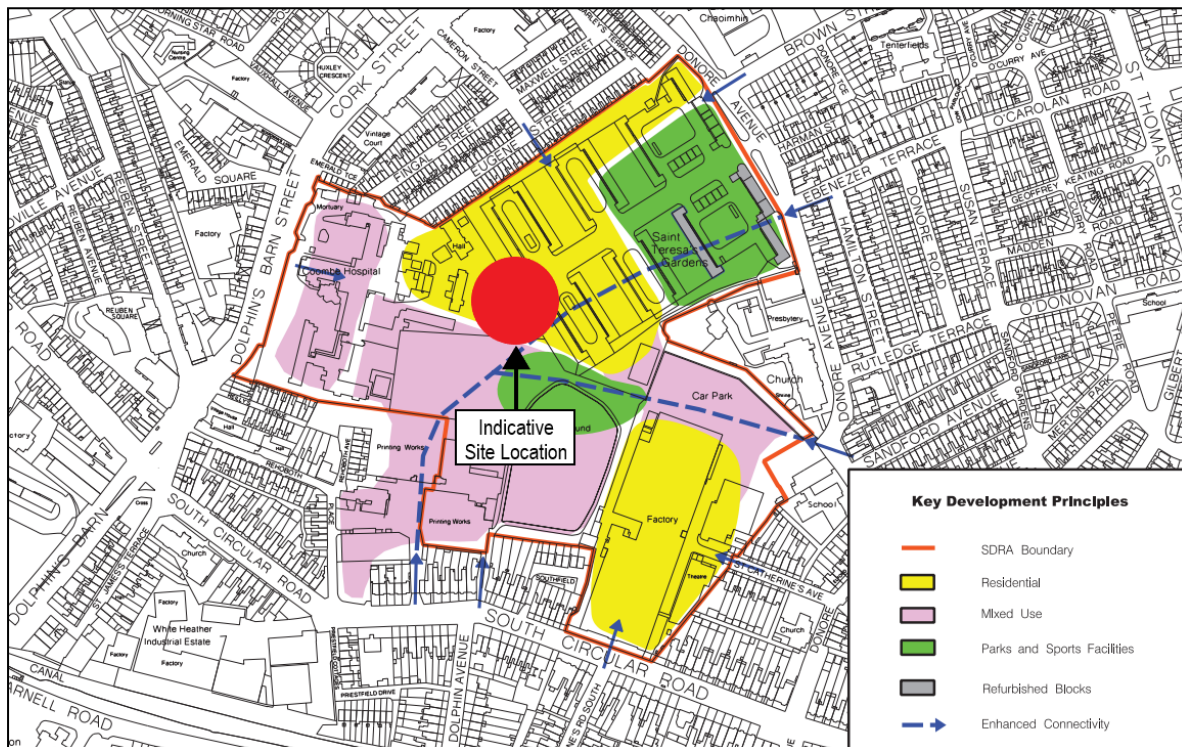
Section 2.3.3 of the Dublin City Development Plan 2016-2022 states that it is an objective of the council to create a quality compact city of mixed – tenure neighbourhoods, catering for a wide range of family types. The Development Plan also notes that:

*“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”*

A specific response to the objectives of SDRA 12 is set out below.

### SDRA 12 – St Teresa’s Gardens and Environs

Chapter 15 of the Development Plan sets out specific guiding principles for each of the SDRA’s in the City. Therefore, the proposed development is subject to the guiding principles of the St Teresa’s Gardens SDRA 12.



**Figure 4: St Teresa’s Gardens and Environs SDRA (Source: DCC Development Plan).**

The guiding principles for development in SDRA 12 are set out in the Development Plan as follows:

- *“The development of a network of streets and public spaces will be promoted to ensure the physical, social and economic integration of St Teresa’s Gardens with the former Player Wills and Bailey Gibson sites, with further integration potential with the sites of the Coombe Hospital and White Heather Industrial Estate*
- *A vibrant mixed-use urban quarter will be promoted with complementary strategies across adjoining sites in terms of urban design, inter-connections and land-use. To provide for an area zoned sufficient in size to accommodate a minimum 80 m by 130 m playing pitch*
- *A new public park is proposed as a landmark feature with passive supervision by residential and other uses; it will have a comprehensive landscaping strategy to provide*

*significant greenery within the scheme and will make provision for a diverse range of recreational and sporting facilities for use by the wider neighbourhood*

- *There is potential for one or two midrise buildings (up to 50 m) within the site, subject to the criteria set out in the standards section of this plan.*
- *To acknowledge the existing sports lands of St Teresa's gardens and its environs and act to retain and augment these lands as sporting facilities for the benefit of the wider community and use by local sports clubs. That at least 20% of the SDRA 12 be retained for public open space, recreation & sporting facilities including an area to facilitate organised games.*
- *Strong permeability through these lands will be encouraged to generate movement and activity east-to-west (connecting Dolphin's Barn Street and Cork Street with Donore Avenue) and north-to-south (connecting Cork Street and Donore Avenue with the South Circular Road and Grand Canal corridor); a high-quality public domain, provision of pedestrian and cyclist routes and provision of active streets will be promoted*
- *A community hub will be incorporated into the scheme to provide a wide range of community facilities accessible to the wider neighbourhood; opportunities to highlight the heritage of the local area by proposing community uses close to important landmark buildings such as St Teresa's Church will be promoted*
- *Provision shall be made for the expansion of St Catherine's National School, Donore Avenue, in the redevelopment of the former Player Wills site, subject to agreement with the Department of Education and Skills."*

The proposed development accords with the guiding principles of the SDRA through the provision of new pedestrian and cyclist access, public open space, and integration with the wider regeneration area. The proposed development will provide for a significant quantum of much needed housing including social housing, along with ancillary facilities including a creche community facilities and artist space.

The proposed development seeks to integrate with the wider regeneration of the area, in particular with separate proposals for the Player Wills and Bailey Gibson sites providing key linkage piece between Donore Avenue, South Circular Road and The Coombe Women & Infants University Hospital.

- 1.1 The Playing Pitch is to be located to the north of the site as part of proposals to be developed by adjacent landowner, Hines (CWTC Multi Family ICAV acting solely in respect of its sub fund DBTR SCR1 Fund) (this is the subject of a current SHD application to An Bord Pleanála ABP Reg. Ref. 314171-22). This anticipated use has been incorporated into the overall design strategy for the site. The proposed Donore Project Park, when considered alongside the open space provided as part of Hines Phase 1 - Bailey Gibson extant permission reference ABP-307221-20 and Hines Phase 2 - Player Wills extant permission ABP-308917-20, will achieve the required 20% of the SDRA 12 lands for Open Space

2 no. public parks have been proposed as part of the Players Wills development; Players Park and St Catherine's Park. The proposed development includes Donore Project Park, which will link the Players Park with the Playing Pitch to the north. Overall, significant public open space provision of 3,408 sqm is provided as part of this development, which equates to 16.64% of the net developable area. While this provision of public open space exceeds the general Development Plan requirement of a minimum of 10% of site area to be public open space.

The various public parks proposed in the two extant Hines permissions, together with the proposed municipal playing pitch included in the current BG2 SHD application (Ref. ABP 314171) before the Board, will ensure that the overall SDRA requirement to retain 20% of the regeneration area as public open space will be exceeded, the applicant is willing to accept the imposition of a condition requiring the payment of a financial contribution in lieu of any shortfall of public open space within the subject site, as is provided for under Section 16.3.4 of the Development Plan.



The proposed development is of a high architectural and urban design quality, which will encourage active uses in the public realm. As part of the proposed development public open space in the form of a park is proposed, which will add to the vibrancy and vitality of the SDRA 12. The proposed development will not impede any plans to incorporate expanded community and school uses into the wider proposals for the SDRA and will contribute positively to the use of existing and proposed community facilities.

The proposed development entails 1 no. midrise building in DCC3 up to 15-storeys in height. Elsewhere the building are low rise (predominantly 7-storeys) and therefore meets the height criteria set out above.

The Donore Project Park located between DCC3 and DCC5 will make a significant contribution to the overall provision of public open space across the SDRA12 lands. The Donore Project development lies at the centre of the SDRA lands. The Donore Project Park consists of a series of high quality, functional, amenable, well overlooked, permeable active and passive open spaces and informal play spaces which are interconnected with a network of pedestrian and cycle routes.

The proposed streets link with the other adjacent plots and the Donore Project Park provides a key green, pedestrian route through the site which ultimately connects Cork Street and Donore Avenue through to the South Circular Road. Potential connections with The Coombe Women & Infants University Hospital are also provided and temporarily landscaped prior to the Coombe lands being further developed.

The majority of community uses are located within the Players Factory and to be proposed as part of Hines's development. A further element of community facilities is proposed as part of the subject application. This will be located with access onto the Donore Project Park which is suitable for more public uses. Uses include a crèche, cultural / artistic space and mobility hub.

Provision for the expansion of St Catherine's National School has been accommodated within the Player Wills application by Hines.

### Chapter 3 Addressing Climate Change

Chapter 3 of the Development Plan 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)."*
- **Policy CC4:** *To encourage building layout and design which maximises daylight, natural ventilation, active transport and public transport use.*
- **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.*

As set out above, the application is supported by a number of reports demonstrating the sustainability of the development, and compliance with the relevant NZEB standards.

EV charging points will be provided (50% of the residential car parking spaces), as this is a detailed design matter the details of the EV Charging spaces can be submitted prior to commencement of development. All remaining spaces will be ‘future proofed’ to provide ducting.

#### Chapter 4: 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.”*
- **Policy 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 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).”*
- **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.”*
- **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.”*
- **Policy SC28:** *“to promote understanding of the city’s historical architectural character to facilitate new development which is in harmony with the city’s historical spaces and structures.”*

The proposed development is located within SDRA 12, and the provision of additional height and density at this location is considered appropriate, in line with the provisions of national, regional and local policy, including the Guiding Principles for SDRA 12 as set out in the Development Plan and all relevant Section 28 Guidelines. The proposed development is of a high-quality architectural design and will enhance the skyline of the area while providing for much needed housing.

The proposed development will provide for much needed housing at a sustainable scale and is of a high standard in terms of urban design and placemaking. The urban design rationale is set out in the Architectural Design Statement accompanying this application. It is considered that the proposed development will contribute to the healthy placemaking, and the objectives set out within the SDRA 12.

The development accords with the above policies in relation to the shape and structure of the City. A Townscape and Visual Impact Assessment (TVIA) is included as Chapter 10 of the EIAR submitted with the application, prepared by AECOM. 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 careful consideration has been taken in limiting the effect of the proposed development on important views and view corridors.

- 1.2 The assessments show that the proposed development is of high-quality design and comprises a palette of materials that promote its uniqueness and identity. Chapter 10 of the EIAR 'Townscape and visual impacts' concludes: *"The proposal will add a new and prominent building quarter and landmark north of the Grand Canal. It will provide structure and introduce a new urban quality to a current brownfield site."*

*Visual effects beyond approximately 500m and up to 1km will reduce quickly and visibility of the Proposed Development will concentrate on the upper sections of the buildings due to intervening screening vegetation and other existing built structures. The Proposed Development will still form a new focal point in available open views, particularly in views south from beyond the canal, but it will be one component and several in these views.*

*Long-distance views beyond 1km will be hard to achieve due to the buildings in the immediate surroundings quickly screen the Proposed Development from view. Vantage points are possible in elevated locations; however, the Proposed Development will be seen as a new part of the overall south Dublin city townscape and as an urban quarter with panoramic views."*

The development is therefore considered compliant with policy SC7.

The proposed development is in accordance with the objective SC16 as the SDRA provides for additional height at this location in accordance with SDRA 12 Guiding Principles.

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 respective Chapter 10 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 TVIA in Chapter 10 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 locations distant to these particular views and high-quality design, whilst in more local, short-range views, the building will positively respond to its immediate context and enhance the streetscape.

## **Chapter 5 Quality Housing**

Section 5.5.2 of the 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"*.

As widely noted in this Report and within accompanying documentation, the proposed development entails an entirely appropriate density which is supported by local amenities, public transport, high quality architecture and landscaping proposals. The result will be a development which is integrated into the existing context.

In addition, we note the following other relevant policies in regard to housing within the Chapter 5:

- **Policy QH5:** *“To promote residential development addressing any shortfall in housing provision through active land management and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites”.*
- **Policy QH6:** *“To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.*
- **Policy 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.*
- **Policy 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.”*
- **Policy QH10:** *“To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities”*
- **Policy 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 guiding principles and development standards set out in the development plan”.*
- **Policy QH18:** *To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.*

The proposed development accords with the relevant housing policies, in terms of creating a sustainable development on under-utilised lands at a city location. The development will deliver 543 no. apartments, with other complimentary facilities and amenities including a creche. The proposed development is located in close proximity to existing services and facilities, however a creche will also be provided as part of the development to ensure sufficient social infrastructure. Further details are set out in the Social and Community Audit submitted with the application.

As set out in Section 7, the proposed density has regard to the surrounding context and character of the area. The subject site benefits from high levels of connectivity in the context of public transport, with Dublin Bus (within 5 minutes) and a short walking distance to the Fatima Luas stop (12 minutes), and new infrastructure is also proposed in close proximity to the site including BusConnects. Proposed pedestrian and cyclist linkages to adjacent sites will result in a significant improvement on permeability in the area enabling future residents to access public transport and nearby amenities.

Overall, the scheme will provide for high quality apartments, that will successfully integrate with the character of the surrounding area, further specific information is contained within MW's HQA including a large number of oversized and dual / triple aspect units.

In response to QH12, this Part 10 application is supported by a number of reports demonstrating the sustainability of the development, including Sustainability and Energy Statement by AECOM. The proposed development will comply with Part L regulations (NZEB).

## **Chapter 8 Movement and Transport**

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



- **Policy MT2:** *“Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government’s ‘Smarter Travel’ document and in the NTA’s draft transport strategy are key elements of this approach.”*
- **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.”*
- **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.”*
- **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.”*
- **Policy MT19:** *“To safeguard the residential parking component in mixed-use developments.”*

The proposed development is considered appropriate for reduced car parking provision. Further details are set out in the TTA and Mobility Management Plan submitted with the application, prepared by AECOM. 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 south inner-city neighbourhood of South Circular Road / Cork Street.

The BusConnects project will improve dedicated bus facilities and improve the Dublin Bus network. Proposed Core Bus Corridor no. 9 is proposed to run along Cork Street, to the north of the subject site. This will also deliver improved cycling facilities along Cork Street.

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

As above, the development is considered appropriate for reduced car parking provision in accordance with the Development Plan, and also the Apartment Guidelines 2020. The proposal also includes 79 no. car parking spaces comprising 6 no. car parking spaces for mobility impaired users, together with a further 15 no. on street short term spaces. 30 No. car share spaces and 50% Electric Vehicle charging points are provided.

The TTA 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.

## Chapter 9 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.”*

- **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.”*
- **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.”*
- **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.”*
- **Policy SI24:** *“To monitor and improve air quality in accordance with national and EU policy directives on air quality and, where appropriate, promote compliance with established targets.”*
- **Policy SI25:** *To seek to preserve and maintain air and noise quality in the city in accordance with good practice and relevant legislation.*
- **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.”*

The Infrastructure Report prepared by AECOM provides further details on the proposals for water supply and wastewater treatment, and compliance with the use of SUDS as part of the development.

A pre-connection enquiry was made to Irish Water and confirms that subject to a valid connection agreement being put in place, the proposed connection to Irish Water Networks can be facilitated.

A Site-Specific Flood Risk Assessment report has been prepared by AECOM Consulting Engineers for the proposed development and accompanies the planning documents. Chapter 7 ‘Hydrology’ prepared by Enviroguide in the EIAR submitted with the application also considers flood risk.

A Construction and Demolition Waste Management Plan, and an Operational Waste Management Plan are submitted with the application to prevent and minimise waste as part of the demolition, construction and operational phases as part of the development.

Chapter 8 of the EIAR assesses the likely air quality and climate impacts, and Chapter 9 of the EIAR assesses the potential noise and vibration impacts associated with the proposed development and outlines a number of mitigation measures to avoid any likely significant effects..

An External Lighting Design Report prepared by AECOM is submitted with the application, and this includes a public lighting scheme for the 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.

## Chapter 10 Green Infrastructure

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.”*

In accordance with GI12 an AA Screening Report has been prepared by Altamar, this report concludes:

*“In a strict application of the precautionary principle, it has been concluded that significant effects on the integrity of South Dublin Bay SAC, North Dublin Bay SAC, South Dublin Bay and River Tolka Estuary SPA and North Bull Island SPA are likely from the proposed works in the absence of mitigation measures, primarily as a result of the indirect hydrological connection to the site via dust and contaminated surface water drainage to an existing public surface water drainage network which outfalls to the Poddle Stream, which in turn outfalls to the River Liffey and the marine environment at Dublin Bay. For this reason, an NIS was carried out to assess whether the proposed project, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European Site. All other Natura 2000 sites were screened out at initial screening.*

*Following the implementation of the mitigation measures outlined, the construction and operation of the proposed development will not result in direct, indirect or in-combination effects which would have the potential to adversely affect the qualifying interests/special conservation interests of the European sites screened in for NIS with regard to the range, population densities or conservation status of the habitats and species for which these sites are designated (i.e. conservation objectives).”*

Chapter 5 of the EIAR Biodiversity, prepared by Altamar addresses the impact of the proposed development locally and in a wider context on biodiversity.

The proposed development includes a range of SuDS measures such as green roofs, permeable paving, swales and bio retention / rain gardens; and green infrastructure such as planting and landscaped spaces. Further details on how the development incorporates green infrastructure is set out in the Landscape Design Statement. As summarised in Section 3, the landscape strategy prepared by AECOM. Permeability is provided through landscaped areas for pedestrians and cyclists.

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 Infrastructure Report prepared by AECOM.

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

## **Chapter 11: 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 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 workspace is a key element in all multiuse developments in the city, in particular ensuring there is provision for cultural and artistic space in developments.”*

**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.”*

**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.”*

An assessment of the effects on built heritage receptors is included in an Archaeology and Cultural Heritage, prepared by AECOM, which forms Chapter 11 of the EIAR. This demonstrates that the proposed development creates no negative effects to the significance or settings of protected structures in the area.

The application is supported by a Community and Social Audit prepared by John Spain Associates. The wider area is served by a high concentration of cultural and community uses, with the city centre location of the site providing for convenience of access to many of the foremost cultural locations and institutions in the State. The surrounding area also benefits from other community, social, and religious infrastructure. Artistic workspaces and cultural space are included as part of the overall proposed development.

It is therefore considered the proposals comply with policy CHC 28 and CHC31.

A wide range of high quality public open spaces are provided which have multi-functional uses enabling enjoyment of the area by the public and contributing to a sense of place. High quality and robust materials are provided with appropriate planting in these areas.



## Chapter 12: Making Sustainable Neighbourhoods

Section 12.5.2 of the Development 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.

The following policies are of relevance:

- **“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.”*
- **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](http://www.environ.ie)).*
- **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.*
- **SN6:** *To optimise, align and integrate individual social audits/community infrastructure provision in developing and regenerating areas, the City Council will carry out and maintain a community audit for the strategic development and regeneration areas (SDRAs), where appropriate.*
- **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.*
- **Policy SN25:** *To actively support urban regeneration in areas across the city in order to enhance social cohesion and potential for positive change in areas of social exclusion.”*

The proposed residential development entails a much needed and significant regeneration the subject site which has remained vacant for some time. Other uses which will benefit the community include a creche, artist workspaces, cultural space, mobility hub and open spaces.

In response to SN2, the palette of materials and finishes chosen has been selected with the existing context in mind, responding to the established character of the South Circular Road. Please see MW's Design Statement for additional detail.

As set out in Sections 7, the proposed development has had regard to, and complies with, the relevant S. 28 Ministerial Guidance. Furthermore, and as discussed above, the application is accompanied by a Social and Community Audit. In accordance with the above policies, the proposed development will enhance the site, by incorporating a mix of uses, including residential accommodation, arts/cultural space, a creche, community café, a mobility hub and a centrally located public space overlooked by the café. This will complement the existing range of facilities and services in the local area.

The proposed development is accompanied by a Social and Community Audit. In accordance with the above policies, the proposed development will enhance the site, through the provision of significant residential accommodation and retail/café unit (168 sq.m.), mobility hub (52 sq.m.) and 952 sq.m. of community, artist workspace, arts and cultural space, including a creche, set out in 4 No. blocks. This will complement the existing range of community facilities and services in the local area.

In response to SN25, all of the development will be cost rental and social housing creating a large mix of tenures thereby reducing social exclusion in the area.

## **Chapter 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.

### Large Scale Development

Further details on the design evolution are set out in the Design Statement prepared by MW, 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:

- *To create new compositions and points of interest*
- *To provide high-quality new streets, squares and open spaces, where appropriate, linked to the surrounding street pattern, to maximise accessibility*
- *To provide an appropriate mix of uses comprising retail, residential, entertainment, recreational, cultural, community- and/or employment- generating uses; particular emphasis should be given to new and complementary uses and facilities that expand and improve the existing range of uses and facilities in the area*
- *To carefully integrate appropriate planting and trees*
- *To take into account existing and likely future patterns of traffic and pedestrian movement, including pedestrian desire lines*
- *To retain existing and create new features to make an easily understandable urban environment, including active building frontages with clearly defined edges and safe public routes*
- *To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks*
- *Ensure waste storage facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood*

The proposed development entails new spaces and a carefully considered response to the existing context including new streets, squares and open spaces creating links to the surrounding streets and adjacent plots. This will ensure a high level of accessibility and permeability.

In accordance with the SDRA 12 the proposed development is primarily residential in nature, however a retail/café unit, mobility hub and community, artist workspace, arts and cultural space, including a creche are included.

High quality and extensive planting and trees provisions are set out in detail in AECOM's Design Statement.

As part of the TTA prepared by AECOM and in coordination with the design team the proposed development has assessed the existing and likely future patterns of traffic and pedestrian movement, including pedestrian desire lines. Connections with existing areas and possible linkages to adjacent sites are included and will aid future permeability in the area.

A detailed façade and materiality strategy has been set out within MW Design Statement. The brick used responds the surrounding context and architectural language is carefully set out in order to create an urban environment which is easily understandable.

The details of waste storage facilities, servicing and parking have been sited and designed sensitively to minimise their visual impact and avoid any adverse impacts.

### Landscaping

Section 16.3 of the Development Plan relates to landscaping, stating that landscape design and maintenance plans will be regarded as an integral part of all development applications. Key elements of the Development Plan requirement relate to:

- Hard landscaping such as materials, surface water management, Boundaries and street furniture and reinstatement
- Soft landscaping
- Trees: including existing trees and their protection
- Public Open Space

A detailed response to the above considerations are set out within the Landscape Design Statement and associated drawings prepared by AECOM, in summary the key design drivers of this strategy include the following:

- Open Space Strategy
- Effective Access and Circulation
- Integrated Infrastructure
- Softworks & Biodiversity Strategy
- Spatial Typologies
- Communal Amenity
- Green Infrastructure
- Utility Strategy
- A New Urban Grain



**Figure 5: Extract of landscape strategy (Source: AECOM, 2022).**

The following diagram illustrates the SuDS strategy which are to be incorporated within the landscape proposals, more specific information on each individual SuDS typology in AECOM Landscape documentation.





**Figure 6: extract of SuDS strategy (Source: AECOM, 2022).**

In terms of tree strategy, AECOM state:

- *“Proposed Tree species will vary depending on the design intent and location*
- *The Street and Amenity Trees species will be urban street trees which are proven to be robust*
- *The Amenity Trees will be larger*
- *The Podium Trees will need to be robust as well as shade and wind tolerant. Engagement with the civil engineering team will be required to minimise any constraints to tree planting. Mitigation measures against wind from tall building downdrafts will also need to be considered.”*



**Figure 7: extract of tree and planting strategy (Source: AECOM, 2022).**

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 Section 3 of this Report and the Landscape Design Statement and drawings prepared by AECOM.

The proposed development accords with Section 16.3.4 in relation to Public Open Space. A total of 3,408 sqm of public open space is proposed, which equates to c. 16.64% of the 2.05-hectare NDA, thereby meeting and exceeding the 10% requirement specifically for residential schemes.

### Density

Section 16.4 of the Development Plan 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 net density is 264 units per hectare. It is considered the proposals will contribute to place making and the identity of the area. As discussed above the mix of uses proposed ensure there is sufficient community facilities and social infrastructure to support the development.

### Plot Ratio and Site Coverage

The Development Plan sets out the indicative plot ratios and site coverage percentages for various land use zonings.

The indicative plot ratio on lands zoned Z14 is 1.0-3.0. The proposed development provides for a plot ratio of 2.60. The proposed development is therefore in line with these standards

The indicative site coverage for Z14 is 50%, the proposed site coverage of 46.9% is therefore in compliance with these parameters. These figures are indicative only; higher plot ratios and site coverage may be acceptable under the following circumstances:

- *“Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed;*
- *To facilitate comprehensive re-development in areas in need of urban renewal;*
- *To maintain existing streetscape profiles;*
- *Where a site already has the benefit of a higher site coverage.”*

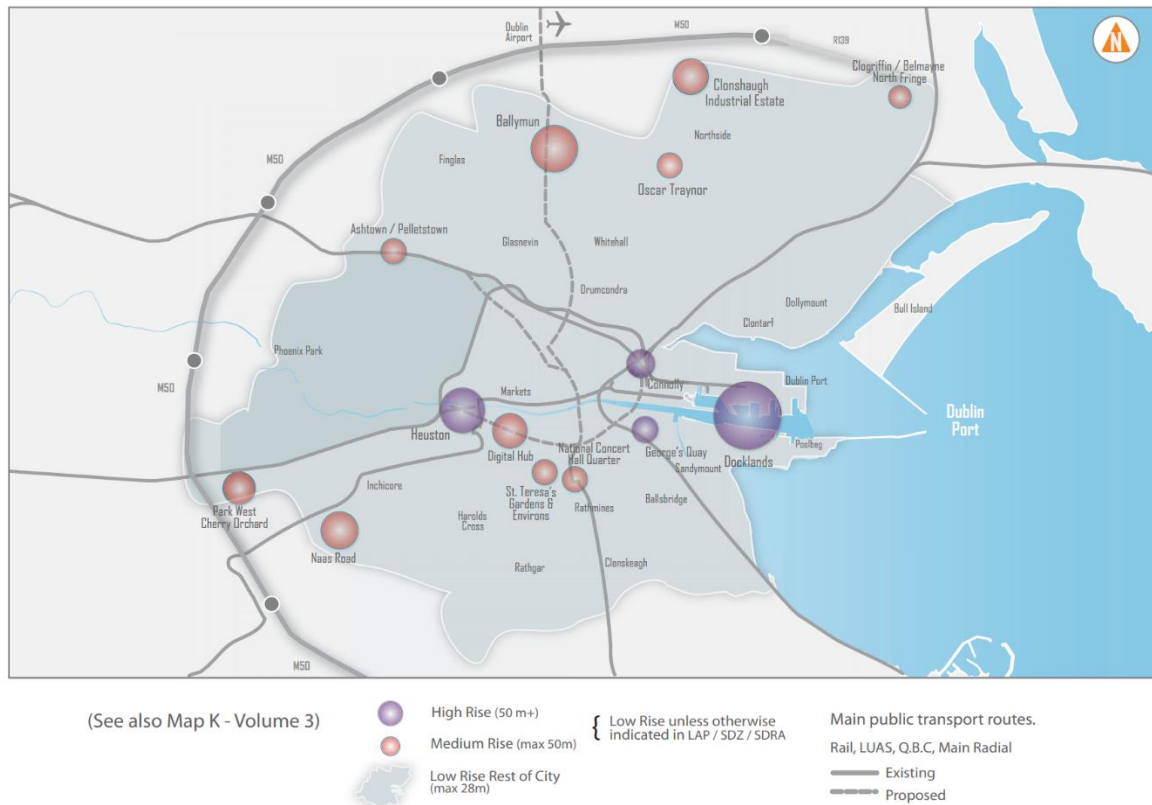
### Building Height

The Development Plan generally sets out maximum heights of 24m for residential buildings in the inner city, with higher buildings promoted at key locations including SDRAs, rail interchanges, and the Docklands (page 320 ‘Building Height in Dublin’). The Development Plan states that *“all areas outlined in the table below are considered to be in the low-rise category unless the provisions of a LAP/SDZ/SDRA indicate otherwise.”*

As set out within the Development Plan greater heights are allowable where provided for in an LAP, SDRA, or SDZ Planning Scheme. In this regard Section 16.7.2 of the Development Plan further states: *“Planning applications will be assessed against the building heights and development principles established in a relevant LAP/SDZ/SDRA. Proposals for high buildings should be in accordance with the provisions of the relevant LAP/SDZ/SDRA in addition to the assessment criteria for high buildings and development plan standards. Chapter 15 provides guiding principles for the design of potential high buildings in SDRAs, where appropriate.”*

Category	Area	Height (m)	Category	Area	Height (m)
<b>Low-rise</b> (relates to the prevailing local height and context)	Inner City	Up to 28 (commercial) Up to 24m (residential)	<b>Mid-rise</b>	Digital Hub	Up to 50 m
				St Teresa's Gardens	
				North Fringe	
	Rail hubs (See 3)	Up to 24m (commercial and residential)		Clonsaugh Industrial Estate	
				Ballymun	
				Pelletstown	
				Park West/Cherry Orchard	
				Naas Road	
				Oscar Traynor Road	
				National Concert Hall Quarter	
	Outer City	Up to 16 m (commercial and residential)	<b>High-rise</b>	Docklands Cluster	50m +
				Connolly	
				Heuston	

**Figure 8: Source: Dublin City Development Plan 2016-2022, Section 16.7.2 page 320 ‘Building Height in Dublin’.**





Of the two taller buildings in the Bailey Gibson permission, one was again in excess of 50m and thus did not fall into the midrise category, while the one midrise building is located outside of the defined SDRA boundary.

On the basis of the above and under the two extant permissions, permission has been granted for three 'high rise' buildings, two 'midrise' buildings (Bailey Gibson SHD of 11 storeys and Player Wills SHD of 1 – 9 storeys), one (Bailey Gibson 1) of which is actually located outside of SDRA 12, and in both cases the permissions granted were reliant on a Material Contraventions on building heights.

One mid-rise building is included within the proposed development (50m in height), with the remainder of the buildings being low rise (under 24m. high). The proposed development is therefore compliant with the building height policy of the Development Plan, and specifically the height policy for SDRA 12.

We note also that the Development Plan states that the Irish Aviation Authority must be notified in all cases where a proposed development exceeds 45m in height. Please see corresponding letter received from IAA as Appendix 2 to this Planning Report.

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 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."*

Therefore, between the two permissions (Player Wills and Bailey Gibson developments) there is only one permitted 'midrise' building within SDRA 12. Accordingly the inclusion of one midrise building within the LDA site is consistent with the SDRA 12 principles set out in the Development Plan of permitting one-two midrise buildings within the St. Teresa's Gardens site, and thus does not constitute a material contravention of the Development Plan.

Further, we note the accompanying 'Assessment Criteria for Higher Buildings'

*"All proposals for mid-rise and taller buildings must have regard to the assessment criteria for high buildings as set out below:*

- *Relationship to context, including topography, built form, and skyline having regard to the need to protect important views, landmarks, prospects and vistas*
- *Effect on the historic environment at a city-wide and local level*
- *Relationship to transport infrastructure, particularly public transport provision*
- *Architectural excellence of a building which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for*

- *Contribution to public spaces and facilities, including the mix of uses Development Standards: Design, Layout, Mix of Uses and Sustainable Design*
- *Effect on the local environment, including micro-climate and general amenity considerations*
- *Contribution to permeability and legibility of the site and wider area*
- *Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, a 360-degree view analysis, shadow impact assessment, wind impact analysis, details of signage, branding and lighting, and relative height studies*
- *Adoption of best practice guidance related to the sustainable design and construction of tall buildings*
- *Evaluation of providing a similar level of density in an alternative urban form”*

In response to the above, please also see MW Design Statement which sets out compliance with the above criteria.

The proposed development makes a significant contribution to the immediate area in terms of design quality, public open space and public realm carefully responding to the immediate context.

The TTA prepared by AECOM sets out the assessment of the proposed development in relation to the transport environment.

Chapter 10 LVIA and Chapter 11 Archaeology & Cultural Heritage of the EIAR sets out the assessment of the development on the historic built environment.

Micro-climate assessment has also been carried out and is enclosed with the application under Chapter 8.2 of the EIAR.

#### 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 S.28 Ministerial Guidance (Apartment Guidelines 2020), the proposed development complies with the 2016-2022 Plan in respect of the standards except where specifically noted, which are generally more onerous compared to the Apartment Guidelines. The HQA prepared by MW provides detail on compliance with same.

#### Unit Mix

With reference to the unit mix in apartment developments, the Development 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 Development 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.”*

The primary purpose of the residential content of the scheme is to meet clear demand for affordable rental and social apartments in urban locations.

The development contains the following mix of apartments:

- 225 No. 1 bed apartments (36 no. 1-person & 189 no. 2-person), (41.4%)

- 274 No. 2 bed apartments (including 52 No. 2 bed 3 person apartments & 222 No. 2 bed 4 person apartments), (50.4%)
- 44 No. 3 bedroom 5-person apartments, (8.1%)

The scheme makes a significant contribution to housing in the area through the provision of a scheme which is 100% social and affordable housing. This includes a 28% - 72 % split in tenure as follows: Social Housing of 28% and Cost Rental of 72%.

In this regard we note the provisions of

*QH3: (i) To secure the implementation of the Dublin City Council Housing Strategy in accordance with the provision of national legislation. In this regard, 10% of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/ or affordable housing in order to promote tenure diversity and a socially inclusive city.*

As set out in the Housing Strategy (Appendix 2A)

*Quality, affordable housing provision plays a key role in underpinning and maintaining economic growth and competitiveness for Dublin city. Significantly, there is a pressing need to ensure a speedy, effective and sustainable step-up in future housing supply to catch-up with the overheating segments of Dublin's housing market and thereby reduce price inflation in owner-occupied and rental housing tenures. Additionally, the scale of unmet housing needs has grown over the period of the previous city development plan and requires an increase in housing output for social rental. The experience of homelessness in Dublin has also broadened over the period as the extent of demand for emergency accommodation deepens and strengthens.*

As set out in the MW Design Statement:

*In terms of design, the scheme is tenure blind with each tenure having dedicated cores but sharing podium level communal spaces. The two tenures are mixed across all of the blocks apart from DCC6 which is a single tenure.*

*One core in DCC3 is dedicated to housing for older people (social housing). This is located the centre of the proposed masterplan lands, and facing onto Player's Park.*

The proposed development contains a significant quantum of social and cost-rental units in excess of the normal requirements of the plan, meeting import objectives to achieve affordable and quality housing in the City.

### Storage

Section 16.10.1 of the Development Plan provides minimum storage requirements for apartments. All apartments shall be provided with designated internal storage space for the storage of everyday household items, separate from the areas allocated for kitchen presses, bedroom furniture or areas containing the cold and hot water tanks. No individual storage room within the apartment should be bigger than 3.5sq.m. Storage area requirements are as follows:

**Table 0.1: Development Plan minimum storage areas required**

<b>Apartment Type</b>	<b>Storage Requirements</b>
1 bedroom (2 persons)	3 sq.m
2 bedroom (4 persons)	6 sq.m
3 bedroom (5 persons)	9 sq.m

As shown within the accompanying floor plans and HQA prepared by MW, the proposed development complies with these standards for minimum storage areas, with a number of units providing storage well in excess of these minimum requirements.

#### Entrance Lobbies, Circulation and Safety / Privacy

Section 16.10.1 of the Development Plan provides guidance on visibility into apartments from public areas. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, the Development Plan states that *“consideration may be given to the provision of a ‘privacy strip’ of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.”*<sup>1</sup>

The proposed scheme provides for a clear separation between the windows of the ground floor and the public/communal access areas to ensure adequate residential amenity residents of the ground floor apartments. Low level privacy planting is included to ensure that appropriate distances are maintained from pathways and entrances, specifically at entrances and windows, allowing privacy and amenity value to be maintained for units which front the internal courtyards and communal areas. Please refer to the enclosed architectural drawings prepared by MW, which provide further detail in this regard, and including sections at ground floor level.

#### 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. There is no target for apartment schemes.

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 proposed scheme has been designed to have regard to the residential amenity of adjacent uses, whilst providing a high-density redevelopment on the subject site, and the design rationale for the proposed layout and relationship to adjoining uses is outlined further within the accompanying Architectural Design Statement.

The location of the proposed development and its layout has been carefully designed to minimise any potential overlooking of adjacent developments while maintaining appropriate separation distances insofar as is practical, acknowledging the permitted development to the south and east. The distances provided between the proposed blocks and the aforementioned neighbouring developments is considered appropriate.

It is noted that the Sustainable Residential Guidelines states the following in Section 6.10:

*‘The emphasis in designing and considering new proposals should be on achieving good quality development that reinforces the existing urban form, makes effective use of premium*

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<sup>1</sup> Dublin City Development Plan 2016–2022, pg. 325



*centrally located land and contributes to a sense of place by strengthening for example the street pattern or creating new streets. 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’.*

Thus, while the recommended separation distance of 22 metres between directly opposing windows for 2 storey houses is not achieved in every instance (and is not in any event applicable to the subject development), this is considered acceptable given the urban context of the infill development, the general compliance of the scheme in this regard and minimum impact on adjacent properties, as further supported by the accompanying Daylight & Sunlight Assessment.

### 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 and Community Audit is submitted with the application demonstrating the excellent availability of existing facilities within the area, including healthcare, schools, green parks, community, cultural and recreation, and how the proposal will contribute to the range of supporting social, community and cultural infrastructure.

### Private Open Space

Private Open Space is provided in the form of balconies and terraces for all proposed residential units. The minimum standards adhere to those required per the Apartment Guidelines, as reproduced in the table below:

Unit Type	Min Size	Units	Required
Studio	4 sq.m	n/a	n/a
1-bedroom unit	5 sq.m	225	1125
2-bedroom unit	7 sq.m	274	1918
3-bedroom units	9 sq.m	44	396
	<b>Total</b>	<b>543</b>	<b>3,439</b>

As demonstrated within the accompanying HQA document, all private amenity space meets or exceeds these minimum standards, with sufficient levels of screening and sheltering provided to maintain both privacy and comfort for occupants.

### Communal Open Space

The Development plan outlines the minimum standards required for communal amenity space, as reproduced in the table below (size is provision that must be provided per unit):

Unit Type	Min Size	Units	Required
Studio	4 sq.m	n/a	n/a
1-bedroom unit	5 sq.m	225	1125
2-bedroom unit	7 sq.m	274	1918
3-bedroom units	9 sq.m	44	396
	<b>Total</b>	<b>543</b>	<b>3,439</b>

There is a total requirement for 3,439 sq.m based on the requirements of the table below from Appendix 1 and the provision of 543 no. units on site. Thus, the proposals exceed the minimum standards by providing 4,417 sq.m of communal open space, and as such are consistent with the necessary requirements. The communal open space is provided at courtyard level (ground and first floor) and rooftop level within various blocks. Please refer to the accompanying landscape drawings and report for further details of communal open space provision.

The Development Plan further states that new development will need to *“consider the needs of children in particular in terms of safety and supervision. In schemes of 25 or more units small play spaces of 85-100 sq.m are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should be provided.”*

Please refer to the accompanying landscape drawings prepared by MW Architecture, which demonstrates full conformity with the above.

#### Play Spaces

Section 16.15 provides further details on play spaces. This includes that spaces for small children should be provided 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 a number of informal play areas that cater for young children. 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. In addition, as per the guiding principles for SDRA 12 as set out in the Development Plan, play areas for older children, including the proposed municipal playing pitch, are to be provided on the adjoining sites within the SDRA.

#### Aspect, Natural Lighting, Ventilation and Sunlight Penetration

Per the requirements of the Development Plan, the proposed development adheres with the standards of the apartment guidelines with regard to dual aspect units, with 45% of units offering dual / triple aspect. As justified previously in this report under the assessment of the Apartment Guidelines, this is in excess of the 33% requirement for the site.

Page 324 of the Development Plan further states that *“It is a specific planning policy requirement in the Department of Environment, Community and Local Government (DECLG) 2015 Guidelines that a minimum floor to ceiling height of 2.7 m shall be required for ground floor level units and 2.4 m for all other levels, measured from finished floor level to finished ceiling height.”* In this regard, we refer to the accompanying section drawings and the Architectural Design Statement, prepared by MW.

### Car and Cycle Parking

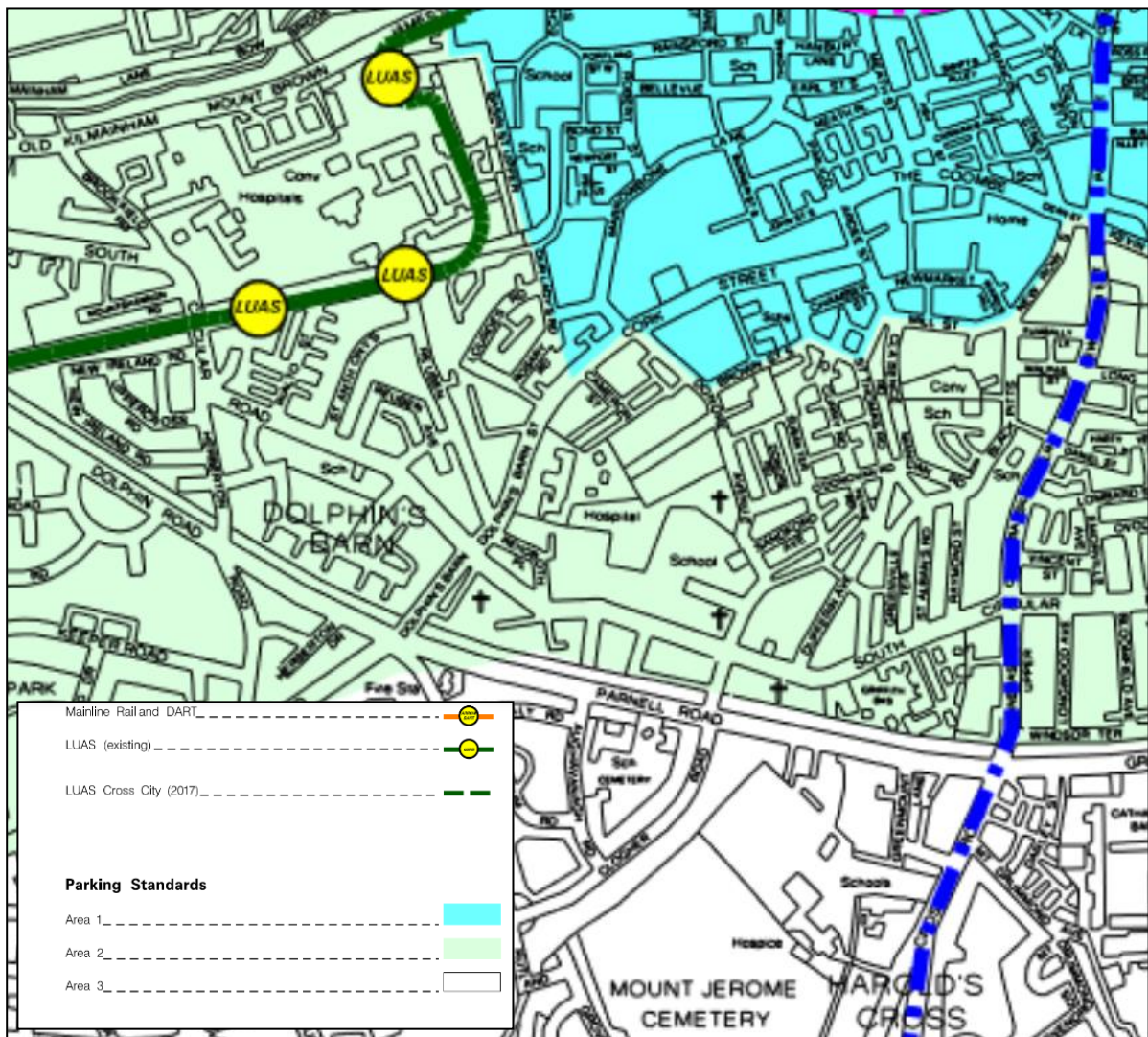
The Development Plan also specifies the maximum car parking standards, and minimum cycle parking provision for proposed developments. The subject site is located in parking Area 2. The Development Plan sets out maximum standards only of 1 space maximum per dwelling in this location. In terms of bicycle parking, the standard is 1 space per dwelling.

For cultural and recreational buildings, 1 space per 250 sq. m is required. Car parking standards are maximum.

The Development Plan sets out a maximum car parking standard of one space per dwelling, giving a maximum allowed provision of 543 no. spaces. A total of 79 no. spaces are proposed to be provided. The rationale and justification for this level of car parking provision at a ratio of 1:0.15 is set out in the TTA prepared by AECOM, which accompanies this application, and is in accordance with the flexibility provided for within the Development Plan.

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.



**Figure 9 – Dublin City Council Map J Parking Zones**

The Development Plan sets out a minimum cycle parking standard of one space per dwelling, giving a minimum requirement of 543 no. cycle parking spaces. It is proposed to provide a total of 1,044 no. cycle parking spaces, including 138 no. visitor spaces, which exceeds this requirement. The proposed development is therefore compliant with the car and cycle parking standards of the Development Plan.



## **APPENDIX 2: CORRESPONDENCE WITH IAA**

**Irish Aviation Authority**  
The Times Building  
11–12 D'Olier Street  
Dublin 2, D02 T449  
Ireland

**Údarás Eitlíochta na hÉireann**  
*Foirgneamh na hAmanna*  
11–12 Sráid D'Olier  
Baile Átha Cliath 2, D02 T449,  
Éire

T: +353 1 671 8655  
F: +353 1 679 2934  
www.iaa.ie



**Operations**  
Directorate

**An Stiúrthóireacht**  
**Oibríochtaí**

**Mr. David Ferguson**  
**John Spain Associates**  
**39 Fitzwilliam Place**  
**Dublin 2**  
**D02 ND61**

**Re. 'Donore Project' located at the Former St. Teresa's Gardens, Donore Avenue, Dublin 8**

Dear Mr. Ferguson and to whom it may concern,

For the purposes of the pre-planning application process as referenced above and in my capacity as IAA Air Navigation Service Provider (ANSP) Manager Airspace and Navigation, I have received and reviewed pre-planning information in relation to this development, as supplied by John Spain Associates.

The heights /elevations of the proposed structure and associated construction crane to be used associated with this project are noted and, in my assessment, do not affect flight procedures at Dublin Airport.

The proposed elevations to be used are also below the elevation assessed as potentially affecting the daa (copied) managed Obstacle Limitation Surfaces (OLS) at Dublin Airport.

I may be contacted for any clarification if required, as follows:

Email: [cathal.maccristail@iaa.ie](mailto:cathal.maccristail@iaa.ie)  
Mobile: 086 0527130

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Cathal Mac Criostail  
IAA Manager Airspace and Navigation  
**2<sup>nd</sup> December 2022**

**cc. Paul Cumiskey, Gary Mackin, daa**  
**IAA Corporate Affairs Planning**

**Bord Stiúrthóirí/Board of Directors**  
Rose Hynes (Cathaoirleach/Chairman),  
Peter Kearney (Príomhfheidhmeannach/Chief Executive)  
Cian Blackwell, Marie Bradley, Ernie Donnelly,  
Gerry Lumsden, Joan McGrath, Diarmuid Ó Conghaile,  
Eimer O'Rourke

**Oifig Chláraithe:**  
*Foirgneamh na hAmanna, 11-12 Sráid D'Olier*  
*Baile Átha Cliath 2, D02 T449, Éire*  
*Uimhir Chláraithe: 211082. Áit Chláraithe: Éire*  
*Cuideachta Dlíteanais Theoranta*

**Registered Office:**  
The Times Building, 11-12 D'Olier Street  
Dublin 2, D02 T449, Ireland  
Registered No. 211082. Registered in Ireland  
A Limited Liability Company

### **APPENDIX 3: DCC LETTER IN REGARD TO CONFIRMATION OF DEMOLITION**



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

Office of the Assistant Chief Executive  
Housing & Community Services  
Block 1, Floor 3, Wood Quay, Dublin 8  
T: 01-222 2010 E: [coilin.oreilly@dublincity.ie](mailto:coilin.oreilly@dublincity.ie)

Clare Fox Snr. Development Manager  
The Land Development Agency  
2<sup>nd</sup> Floor, Ashford House  
Tara St.  
Dublin 2  
D02 VX67

28<sup>th</sup> July 2022

*Without prejudice/Subject to contract*

**Re: Confirmation of proposed demolition of existing remaining flat blocks on St. Teresa's Gardens Flat Estate granted planning permission under Reg. Ref. 2475/18**

Dear Clare,

Further to your request of 5<sup>th</sup> July last, Dublin City Council hereby confirm that the demolition of the remaining buildings currently on site and granted planning under Reg. Ref. 2475/18 will be completed in advance to facilitate the required construction of the Donore Project.

Yours sincerely,

Coilin O'Reilly  
Assistant Chief Executive

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Richard Shakespeare  
Assistant Chief Executive

## **APPENDIX 4: DCC LETTER IN REGARD TO COMMUNITY FACILITIES**



Clare Fox  
The Land Development Agency  
2<sup>nd</sup> Floor, Ashford House  
Tara St.  
Dublin 2  
D02 VX67

2<sup>nd</sup> September 2022

*Without prejudice/Subject to contract*

**Re: Letter of Confirmation to facilitate the lodgement of a Part 10 Planning Application to An Bord Pleanála in relation to the Donore Project lands (formerly St. Teresa's Gardens Flat Estate) Donore Road, Dublin 8.**

Dear Clare,

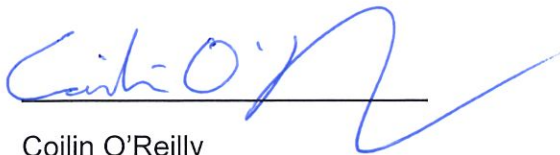
In relation to the Donore Project, and the development of 543 new homes on the site of the former St. Teresa's Gardens, Dublin City Council can confirm that there are a number of proposed community use buildings and infrastructure which will be provided by the Council in the immediate vicinity of the proposed development which should be considered in conjunction with the facilities to be provided within the proposed residential development itself. These include:

- A rebuilt community centre with approximately 1,490sqm of internal floor space
- A new boxing club and changing rooms with approximately 240sqm of internal floor space
- A new municipal playing pitch
- A linear park and playground

This will provide an additional 1,730sqm of internal community amenity, together with extensive external space, and should offset the requirement for provision of such space within the proposed Donore Project Development.

In light of the above, we wish to confirm that Dublin City Council are agreeable that 50% of the community/arts/culture floorspace requirement under Objective CU022 of the Draft Dublin City Development Plan 2022-2028 in respect of the proposed residential scheme by The Land Development Agency on the site of the former St. Teresa's Gardens will be met by the City Council's own plans for the provision of community facilities within the immediate vicinity of the Donore Project site.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Coilin O'Reilly', written over a horizontal line.

Coilin O'Reilly  
Assistant Chief Executive

A handwritten signature in blue ink, appearing to read 'Richard Shakespeare', written over a horizontal line.

Richard Shakespeare  
Assistant Chief Executive

## Appendix B