



THORNTON O'CONNOR
TOWN PLANNING

Planning Report & Statement of Consistency

Planning Report & Statement of Consistency

In respect of a Mixed-Use Development on a site at:

Leydens Wholesalers & Distributors,
No. 158A Richmond Road,
Dublin 3,
D03 YK12

Submitted on Behalf of Malkey Limited

February 2023

TABLE OF CONTENTS

1.0 INTRODUCTION

- 1.1 Multi-Disciplinary Team
- 1.2 Purpose of this Report
- 1.3 Documents Discussed Throughout this Report
- 1.4 Description of the Proposed Development

2.0 SITE LOCATION, DESCRIPTION AND CONTEXT

- 2.1 Site Location
- 2.2 Site Description
- 2.3 Site Context
- 2.3.1 Zoning Objective
- 2.4 Site Accessibility

3.0 PLANNING HISTORY

- 3.1 Subject Site
- 3.2 Pending Decision for a Strategic Housing Development at the Adjacent Lands
- 3.3 Planning History of Surrounding Sites
- 3.3.1 DCC Reg. Ref. 2945/15 – Mixed-use Development of 2 No. Commercial Units and 39 No. Apartments (Deakin Court)
- 3.3.2 DCC Reg. Ref. 2556/18 – Change of Use of 2 No. Commercial Units to a Residential Unit (Deakin Court)
- 3.3.3 DCC Reg. Ref. 4323/17 / ABP Ref. PL29N.301859 – 18 No. Unit Residential Development
- 3.3.4 DCC Reg. Ref. 2935/20 – 7 No. Storey Hotel at Holy Cross College Lands
- 3.3.5 ABP Reg. Ref. ABP-310860-21 – Strategic Housing Development for 1,000+ No. Build-To-Rent Apartments at Holy Cross College (www.holycrosscollegeshd.ie)
- 3.3.6 DCC Reg. Ref. 2957/02 – Neighbouring Site to the East/South-East
- 3.4 Summary of Planning History

4.0 PROPOSED DEVELOPMENT

- 4.1 Description of the Proposed Development
- 4.2 Key Site Statistics
- 4.3 Demolition
- 4.4 Residential Units
- 4.5 Artist Studios
- 4.6 Creche
- 4.7 Retail Unit
- 4.8 Gym
- 4.9 Landscaping Strategy
- 4.10 Building Height
- 4.11 Separation Distances
- 4.12 Materials
- 4.13 Car Parking
- 4.14 Bicycle Parking
- 4.15 Flood Wall
- 4.16 Telecommunication Infrastructure
- 4.17 Road Works

5.0 STATEMENT OF CONSISTENCY - NATIONAL POLICY

- 5.1 *Project Ireland 2040 – The National Development Plan 2021-2030*
- 5.2 *Project Ireland 2040: National Planning Framework*
 - 5.2.1 Introduction
 - 5.2.2 National Strategic Outcomes and Objectives
 - 5.2.3 Population Growth and Employment
 - 5.2.4 Current Trends in Tenure and Household Formation in Ireland
 - 5.2.5 Sustainable Modes of Transport
 - 5.2.6 Scale, Massing and Design
 - 5.2.7 Waste and Environmental Issues
- 5.3 *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)*
- 5.4 *Housing for All– a New Housing Plan for Ireland, September 2021 ("Housing for All")*
- 5.5 *Urban Development and Building- Heights Guidelines for Planning Authorities (December, 2018)*
- 5.6 *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2022)*
- 5.7 *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*
- 5.8 *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009)*
- 5.9 *Design Manual for Urban Roads and Streets (2019)*
 - 5.9.1 Policy Background
 - 5.9.2 Site Layout and Legibility
 - 5.9.3 Sustainable Transport
- 5.10 *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*
- 5.11 *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016*

6.0 STATEMENT OF CONSISTENCY - REGIONAL POLICY

- 6.1 *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*
- 6.2 *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031*

7.0 STATEMENT OF CONSISTENCY - LOCAL POLICY

- 7.1 Zoning and Mix of Uses
 - 7.1.1 Z10 Zoning in the *Development Plan*
 - 7.1.2 Assessing the Proposal's Use-Mix Against the newly adopted *Development Plan*
- 7.2 Density, Residential and Apartment Policies
- 7.3 Built-form: Site Coverage, Plot Ratio and Height
 - 7.3.1 Site Coverage and Plot Ratio
 - 7.3.2 Building Height
 - 7.3.2.1 Compliance with Appendix 3 of the *Development Plan*
- 7.4 Open Space

- 7.4.1 Public Open Space
- 7.4.2 Communal Open Space
- 7.4.3 Private Open Space
- 7.5 Community / Cultural Space
- 7.6 Dwelling Mix
- 7.7 Car Parking
 - 7.7.1 Proposed Car Parking Policy Basis
 - 7.7.2 Bicycle Parking
- 7.8 Response to Other Relevant Policies/Objectives of the *Development Plan*
- 7.9 *Richmond Road Area Action Plan 2007*
 - 7.9.1 Pedestrian/Cycle Route
 - 7.9.2 Richmond Road Improvement

8.0 CONCLUSION

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹ in association with a multidisciplinary team as detailed in the table below, have been retained by Malkey Limited² to prepare this Large-Scale Residential Development ("LRD") comprising a mixed-use scheme at c. 0.55 Ha. developable site at the former Leydens Wholesalers & Distributors, No. 158A Richmond Road, Dublin 3, D03 YK12. The scheme principally comprises the demolition of existing structures on site (c. 3,359 sq m) and the construction of a mixed-use development including artist studios (c. 749 sq m), retail unit (c. 335 sq m), creche (c. 156 sq m), gym (c. 262 sq m) and 133 No. residential units (65 No. one bed units and 68 No. two bed units) in heights ranging from 1 to 10 No. storeys.

1.1 Multi-Disciplinary Team

COMPANY NAME	DOCUMENTS PREPARED
Thornton O'Connor Town Planning No. 1 Kilmacud Road Upper Dundrum Dublin 14 D14 EA89	<ul style="list-style-type: none"> • Planning Report and Statement of Consistency • Social Infrastructure Audit • Childcare Demand Assessment • Schools Demand Assessment • Response to DCC Opinion • Application Form • Site Notice • Newspaper Notice
RKD Architects No. 59 Northumberland Road Ballsbridge Dublin 4 D04 WP89	<ul style="list-style-type: none"> • Architectural Drawing Pack • Schedule of Accommodation • Housing Quality Assessment • Architectural & Urban Design Statement
DBFL Consulting Engineers Ormond House Upper Ormond Quay Dublin 7 D07 W704	<ul style="list-style-type: none"> • Infrastructure Design Report • Engineering Drawings • Site Specific Flood Risk Assessment • Traffic and Transport Assessment Report • Mobility Management Plan • DMURS Design Statement • Preliminary Construction & Environmental Management Plan • Quality Audit (Bruton Consulting Engineers)
Mitchell and Associates Landscape Architects No. 5 Woodpark The Rise	<ul style="list-style-type: none"> • Landscape Drawings • Landscape Design Report • Landscape Visual Impact Assessment • Outline Landscape Specification

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14 D14 EA89

² No. 28 The Drive, Graigavern Lodge Ballybrittas, Co. Laois, Ireland

Glasnevin Dublin 9 Dog NA02	
The Tree File Limited Ashgrove House, No. 26 Foxrock Court, Dublin 18, D18 R2K1	<ul style="list-style-type: none"> • Arboricultural Assessment • Arboricultural Drawing Pack
Enviroguide Consulting 3D Core C Block 71 The Plaza Park West Dublin D12 F9TN	<ul style="list-style-type: none"> • Appropriate Assessment Screening Report • Natura Impact Statement • Ecological Impact Assessment Report (including Bat Assessment) • Statement in Accordance with Article 103(1A)a of the Planning and Development Regulations 2001 • Environmental Impact Assessment Screening Report
AWN Consulting Limited The Tecpro Building No. 17 Clonshaugh Business and Technology Park Dublin 17	<ul style="list-style-type: none"> • Operational Waste Management Plan • Resource and Waste Management Plan • Outline Servicing and Operations Management Plan • Noise Assessment • Microclimate Assessment
3D Design Bureau Unit 1, Adelphi House George's Street Upper Dún Laoghaire Dublin A96 DX47	<ul style="list-style-type: none"> • Daylight and Sunlight Analysis + Response to DCC Opinion • Verified View Montages and Computer-Generated Images
Axiseng Limited No 47 Mount Street Upper Dublin 2 D02 AC95	<ul style="list-style-type: none"> • Part L Planning Compliance for the Mechanical and Electrical Services Installations • Site Lighting Layout
Historic Building Consultants Old Bawn Old Connaught Bray Co. Wicklow	<ul style="list-style-type: none"> • Architectural Heritage Impact Assessment

Rubicon Heritage Office No. 8 Dominick Court 41 Dominick Street Dún Laoghaire Dublin A96 P525	<ul style="list-style-type: none"> Archaeological, Architectural and Cultural Heritage Impact Assessment
O'Herlihy Access Consultancy Guinness Enterprise Centre Taylor's Lane The Liberties Dublin 8	<ul style="list-style-type: none"> Universal Access Statement
Independent Site Management (ISM) No. 77 Camden Street Lower Dublin 2 Ireland Do2 XE8o	<ul style="list-style-type: none"> Telecommunications Impact Assessment Report
Mitchell McDermott No. 72 Leeson Street Upper Dublin 4 Do4 XD92	<ul style="list-style-type: none"> Part V Costings
Aramark Property St Stephens Green House, Earlsfort Terrace, Dublin, Do2 PH42	<ul style="list-style-type: none"> Property Management Strategy Report Building Lifecycle Report

1.2 Purpose of this Report

This Report will include a rationale for the proposal, relevant planning history and a detailed description of the development. This Report will also demonstrate that the proposed scheme (which generally comprises a part 1 to part 10 No. storey development comprising artist studios, retail, creche, gym, and 133 No. residential units) is consistent with national, regional and local planning policy. The proposed development is classified as a Large Scale Residential Development as defined under the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021*:

"a) The development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;

- b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;*
- c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or*
- d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c).*

where the LRD floor space of—

- (i) in the case of paragraph (a), the buildings comprising the houses,*
- (ii) in the case of paragraph (b), the student accommodation,*
- (iii) in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation, is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development.” [Our Emphasis]*

As the proposed development includes 133 No. residential units, the development is therefore considered a Large-scale Residential Development (“LRD”). Furthermore, the non-residential element of the proposed scheme (c. 1,703 sq m) represents c. 12.4% of the total gross floor space of the development and thus is considered to be an LRD application.

The purpose of this report is to provide an overview of the proposed development, demonstrating why the proposal is appropriate at the subject site and ultimately to seek the support of the Planning Authority for the proposal.

1.3 Documents Discussed Throughout this Report

The following policy documents are discussed throughout this Report:

National

1. *Project Ireland 2040 – National Development Plan 2021-2030;*
2. *Project Ireland 2040 – The National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*

6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (December 2022);*
7. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*
8. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009)*
9. *Design Manual for Urban Roads and Streets (2019);*
10. *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);*
11. *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016.*

Regional

10. *Regional Planning Guidelines for the Greater Dublin Area 2010-2022;*
11. *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly; and*
12. *Metropolitan Area Spatial Plan for Dublin City and Suburbs.*

Local

13. *Dublin City Development Plan 2022-2028; and*
14. *Richmond Road Area Action Plan 2007.*

It is through adherence to these documents and reference to their various tests, policies and criteria that this document aims to demonstrate how the proposed development is consistent with National, Regional and Local Planning guidance.

1.4 Description of the Proposed Development

The full description of development is as follows:

Malkey Limited intend to apply for permission for development (Large-scale Residential Development (LRD)) at this c. 0.55 hectare site at the former Leydens Wholesalers & Distributors, No. 158A Richmond Road, Dublin 3, D03 YK12. The site is bounded to the north-east by Richmond Road, to the west/south-west by No. 146A and Nos. 148-148A Richmond Road (pending application ABP Reg. Ref. TA29N.312352), to the south/south-west by a residential and commercial development (Distillery Lofts) and to the east/south-east by the Former Distillery Warehouse (derelict brick and stone building). Improvement works to Richmond Road are also proposed including carriageway widening up to c. 6 metres in width, the addition of a c. 1.5 metre wide

one-way cycle track/lane in both directions, the widening of the northern footpath on Richmond Road to a minimum of c. 1.8 metres and the widening of the southern footpath along the site frontage which varies from c. 2.2 metres to c. 7.87 metres, in addition to a new signal controlled pedestrian crossing facility, all on an area of c. 0.28 hectares. The development site area and road works area will provide a total application site area of c. 0.83 hectares.

The proposed development will principally consist of: a Large-scale Residential Development (LRD) comprising the demolition of existing industrial structures on site (c. 3,359 sq m) and the construction of a mixed-use development including artist studios (c. 749 sq m), a creche (c. 156 sq m), a retail unit (c. 335 sq m), and a gym (c. 262 sq m), and 133 No. residential units (65 No. one bed apartments and 68 No. two bed apartments). The development will be provided in 3 No. blocks ranging in height from part 1 No. to part 10 No. storeys as follows: Block A will be part 1 No. storey to part 4 No. storeys in height, Block B will be part 1 No. storeys to part 10 No. storeys in height (including podium) and Block C will be part 1 No. storeys to part 9 No. storeys in height (including podium). The proposed development has a gross floor area of c. 14,590 sq m and a gross floor space of c. 13,715 sq m.

The development also proposes the construction of: a new c. 204 No. metre long flood wall along the western, southern and south-eastern boundaries of the proposed development with a top of wall level of c. 6.4 metres AOD to c. 7.15 metres AOD (typically c. 1.25 metres to c. 2.3 metres in height) if required; and new telecommunications infrastructure at roof level of Block B including shrouds, antennas and microwave link dishes (18 No. antennas enclosed in 9 No. shrouds and 6 No. transmission dishes, together with all associated equipment) if required. A flood wall and telecommunications infrastructure are also proposed in the adjoining Strategic Housing Development (SHD) application (pending decision ABP Reg. Ref. TA29N.312352) under the control of the Applicant. If that SHD application is granted and first implemented, no flood wall or telecommunications infrastructure will be required under this application for LRD permission (with soft landscaping provided instead of the flood wall). If the SHD application is refused permission or not first implemented, the proposed flood wall and telecommunications infrastructure in the LRD application will be constructed³.

The proposed development also provides ancillary residential amenities and facilities; 25 No. car parking spaces including 13 No. electric vehicle parking spaces, 2 No. mobility impaired spaces and 3 No. car share spaces; 2 No. loading bays; bicycle parking spaces; motorcycle parking spaces; electric scooter storage; balconies and terraces facing all directions; public and communal open space; hard and soft landscaping; roof gardens; green roofs; boundary treatments; lighting; ESB substation; switchroom; meter room; comms rooms; generator; stores; plant; lift overruns; and all associated works above and below ground.

³ The development includes 2 No. scenarios in relation to the provision of a flood wall and telecommunications infrastructure. This is to ensure that the site can be appropriately developed to stand alone should Phase 1 be refused or not first implemented. This approach has been utilised in the Sandford Road SHD also lodged by Thornton O'Connor Town Planning (SHD ABP Ref. Ref. ABP-311302-21) with regard to alternative boundary treatments.

2.0 SITE LOCATION, DESCRIPTION AND CONTEXT

2.1 Site Location

The subject site, which is generally rectangular in shape, is located on the southern edge of Richmond Road approximately c. 640 metres from the junction with Drumcondra Road Lower and c. 450 metres from the junction with the Ballybough Road.



Figure 2.1: Map Showing the Location of the Lands Subject to this Submission Outlined in Red (Indicative Only)

(Source: Myplan.ie, annotated by Thornton O'Connor Town Planning, 2023)

The site is proximate to the Drumcondra Railway Station (c. 1.3 km / c. 17 minutes walking distance) and bus stops on Drumcondra Road Quality Bus Corridor (c. 800 metres / c. 10 minutes walking distance), which ensures that the site is well served by public transport. The cycling infrastructure is also partially segregated on Drumcondra Road Lower and Upper. In addition to the availability of public transport options, the site is within walking and cycling distance of many employment locations, services and facilities.

The total red line application site boundary is c. 0.83 Ha (c. 8,256 sq m) and is broken down as follows:

1. The developable site of c. 0.55 Ha (c. 5,500 sq m); and
2. Road works to Richmond Road: c. 0.28 Ha (c. 2,756 sq m).

The Applicant owns c. 5,500 sq m (c. 0.55 Ha) of the site area which includes the developable lands and a small area of land towards Richmond Road that is included in the road works area above. The remaining land on Richmond Road within the red line boundary is Dublin City

Council land and a letter of consent has been received to include the lands in the application site boundary.

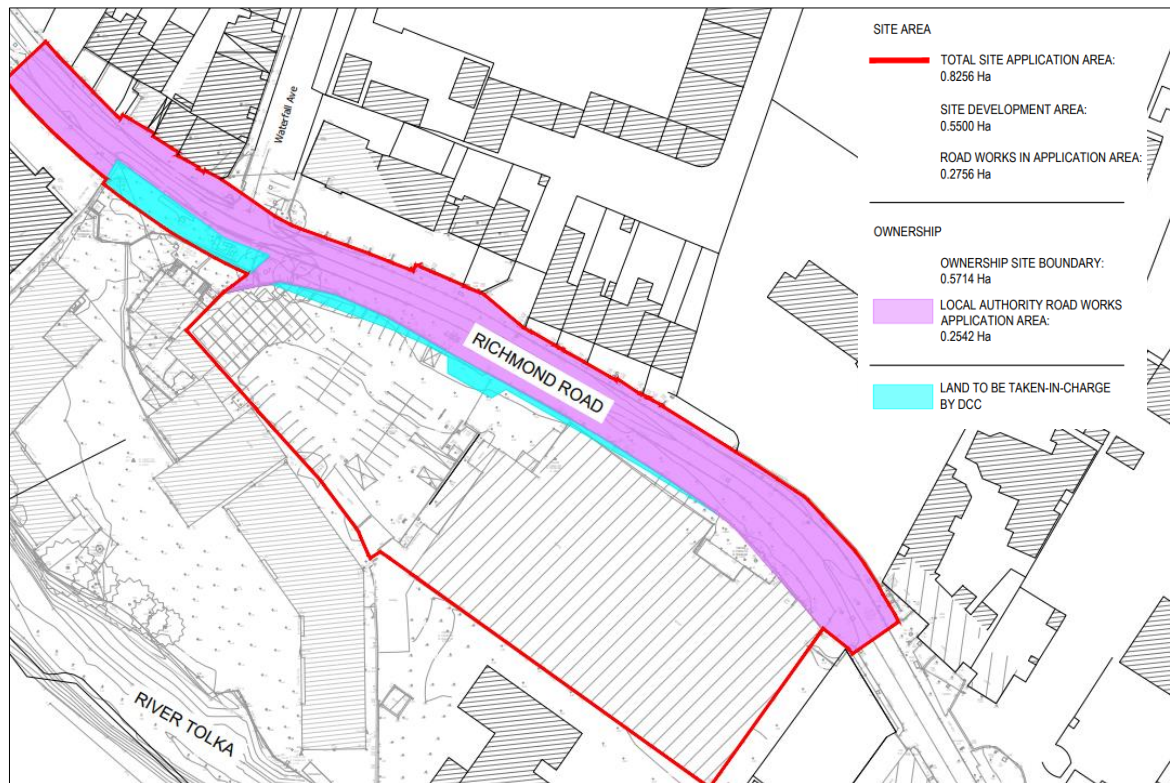


Figure 3.2: Existing Site Plan – Land Ownership Enclosed Which Shows the Extent of Site Ownership Relative to the Subject Application

(Source: RKD Architects Proposed Site Plan, Dwg No. 20199-RKD-ZZ-ZZ-DR-A-1004⁴)

2.2 Site Description

The developable site, which measures c. 0.55 hectares, contains a large warehouse building known as '*Leyden Wholesalers & Distribution*', and includes a large yard area accessed from Richmond Road as demonstrated in Figures 2.2 and 2.3 below. The remainder of the red line boundary relates works to Richmond Road.

⁴ Site Location Map (Dwg No. 220001-RKD-ZZ-00-DR-A-1000) shows the blue line boundary of the entire landholding in the control of the Applicant.

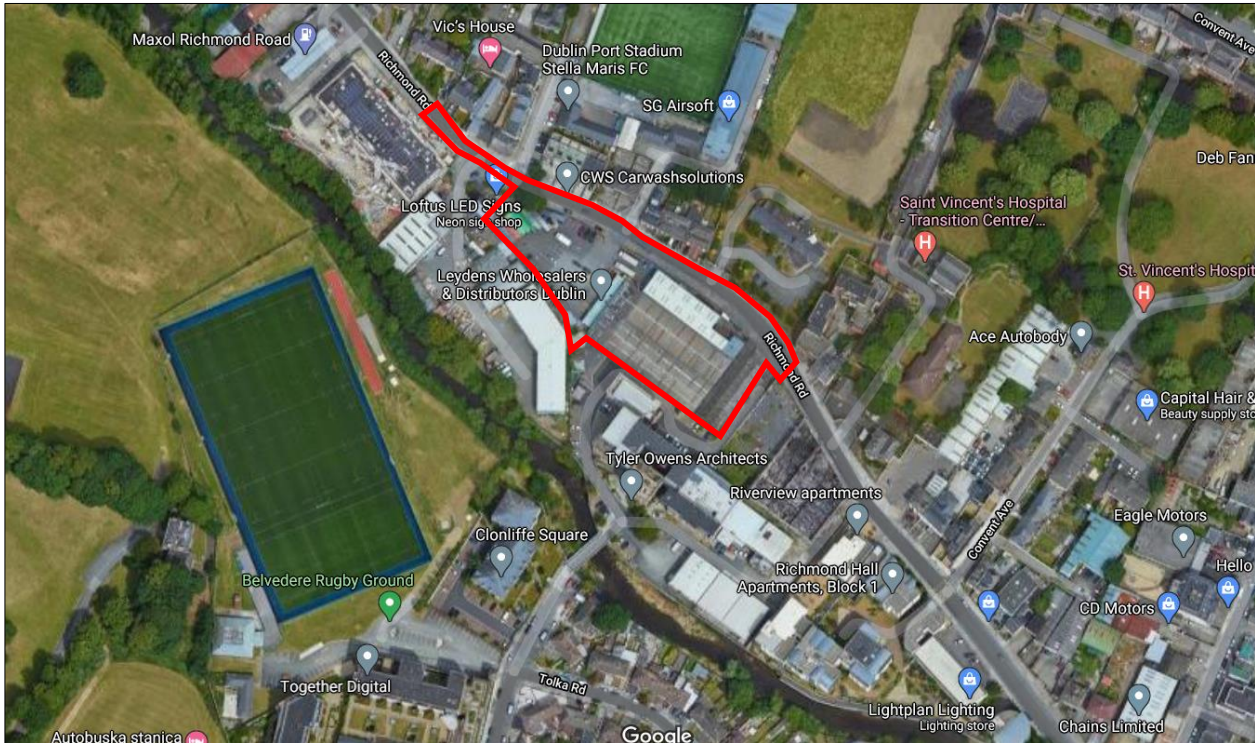


Figure 2.2: Aerial View of the Application Site (Outlined Indicatively in Red)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

The site is bound to the north-east by Richmond Road, to the west/south-west by No. 146A and Nos. 148-148A Richmond Road, Dublin 3 (currently awaiting a decision on a Strategic Housing Development – ABP Reg. Ref. TA29N.312352 and under the control of the Applicant's parent company), to the south/south-west by a residential and commercial development (Distillery Lofts), a part 4 No. to 6 No. storey residential and commercial development, which had permission for a 7 No. storey element (DCC Reg. Ref. 5224/05 which was never constructed), and is also bound to the east/south-east by No. 156-163 Richmond Road (derelict brick and stone building). The part 4 No. to 5 No. storey Richmond Hall apartment development and 5 No. storey Riverview apartment development are located further to the south-east of the site.

2.3 Site Context

The surrounding context of the subject site is generally comprised of a mix of land uses, including but not limited to, late 19th century and early 20th century housing, more recent residential development such as the Richmond Hall apartment development, commercial and industrial land uses, institutional land use in the form of the Clonliffe College Seminary c. 200 metres to the south-west of the site across the Tolka River (permission granted for a mixed-use development under ABP Reg. Ref. ABP-310860-21, albeit quashed further to a recent Judicial Review decision), healthcare in the form of St. Vincent's General Hospital Fairview c. 400 metres to the north-east and recreational land use in the form of the Belvedere rugby grounds c. 150 metres to the south of the subject site across the Tolka River (c. 1.3 km / 15 minute walking distance) and a tennis courts, a pitch and putt golf course and the grounds of Stella Maris Football Club located c. 120 metres to the north of the subject site.

The subject site is located c. 700 metres – 1 km from the District Centre of Drumcondra, an active streetscape which is anchored by the presence of the Drumcondra Train Station (c. 1.3 km or 17 minutes walking distance of the subject site), a Quality Bus corridor and proximity to Croke Park Stadium.

Drumcondra comprises the following services and amenities along Drumcondra Road Upper and Lower in proximity to the subject site, which will serve the subject scheme:

Lidl	Diamond Pizza
The Ivy House Restaurant and Bar	Iona Day Services
Izumi Japanese Sushi & Chinese	Mint Leaf Restaurant
Domino's Pizza Drumcondra	Pinto Wines Store
Restaurant 104	FBD Insurance
Il Corvo Restaurant	Fagan's Bar and Restaurant
The Cartridge Shop	AIB Bank
DCU Institute of Education	Kennedy's Pub
Corrigan's Butchers	Permanent TSB
Benny's Barbers	The Lovely Food Company
Mr Burrito	Bread & Butter Gourmet Market
San Sab Thai Restaurant	Nelly's Café
Cat and Cage Pub	Boylesports Bookmakers
Glasnevin Orthodontics	Shouk Restaurant
Drumcondra Medical	Post Office
Scribbles Newsagents	Centra Drumcondra
Tesco Express	Bank of Ireland
Venus Hair Salon	Independent Pizza Company
Thunders Home Bakery Drumcondra	McGraths Pub
Yummy Oriental	Boles Pharmacy
Lloyds Pharmacy	Advance Late Night Pharmacy
EBS Drumcondra	Le Petit Breton Epicerie Fine Convenience Store & Creperie
Base Wood Fired Pizza	Apache Pizza
Abrahebabra	Bear Lemon Bakery
Insomnia Coffee	

This table demonstrates that there are a variety of facilities and services available for the residents of the proposed scheme to utilise in Drumcondra in close proximity to the site, in addition to the ancillary amenities and facilities that will be provided within the scheme.

2.3.1 Zoning Objective

The subject lands are zoned Objective Z10 'Inner Suburban and Inner City Sustainable Mixed-Uses' in the *Dublin City Development Plan 2022-2028*, where the stated aim is "to consolidate and facilitate the development of inner city and inner suburban sites for mixed-uses".

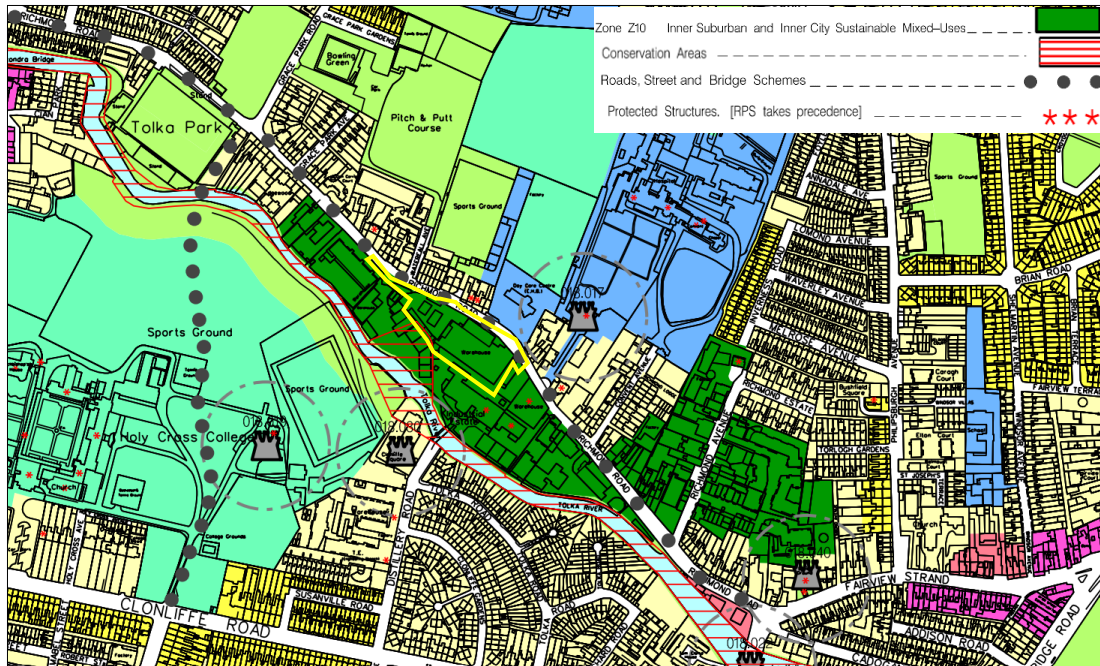


Figure 2.3: Zoning Map of the Subject Site (Indicative Application Site Boundary Outlined in Yellow)

(Source: **Dublin City Council Development Plan 2022-2028, Zoning Map E)**

Part of the subject site is located in proximity to a Conservation Area and there are Protected Structures proximate to the site to the north-east annotated by the red asterisk in Figure 3.6 above.

In addition, the Architectural Heritage Impact Assessment prepared by Historic Building Consultants and enclosed separately notes the following in relation to the Conservation Area and Protected Structures:

"The red hatching that denotes a conservation area runs along the River Tolka and, as has been noted, the hatching also encroaches onto land, through the adjacent commercial site and runs along the boundary of the present application site for a short distance. That part of the conservation area is the part of commercial premises and is no longer part of the river system.

The proposed development would result in a more ordered site than the present commercial use and would be more compatible with the conservation area objective than the present commercial buildings and yard."

2.4 Site Accessibility

The subject site is accessible by foot from the canal ring (c. 19 minutes) and O'Connell Street Upper (c. 30 minutes). The site is located proximate to sustainable modes of transport such as Drumcondra Railway Station (c. 1.3 km / c. 17 minutes walking distance) and bus stops on Drumcondra Road (c. 800 metres / c. 10 minutes walking distance). These bus stops serve the following bus routes (peak frequency): Nos. 1 (every 10-12 mins), 11 (every 15-20 mins), 13 (every 12-15 mins), 16 (every 10-12 mins), 41 (every 20 mins) and 44 (every 60 mins) for example. The surrounding bus networks will also be improved by Bus Connects. A number of

important arterial and orbital roads are located within a short walk of the subject site. In addition, a number of coach services operate adjacent to the Drumcondra Train Station including Aircoach No. 700 to Dublin Airport, Bus Eireann No. 101 to Drogheda, and Matthews Coaches Service No. 900 to Dundalk and No. 910 to Laytown/Bettystown.

A large range of employers, services and facilities are available within a short distance including, but not limited to, St Vincent's General Hospital (c. 450m) c. 600 metres / c. 7 minutes walking distance) and DCU St. Patrick's Campus (c. 800 metres / c. 10 minutes walking distance). The surrounding area provides strong permeability to many of the surrounding neighbourhoods, employment, services and facilities.

In relation to cycling, although no dedicated bicycle infrastructure exists along Richmond Road, the narrow roadway prevents cars from reaching high speeds and thus a relatively safe space for cyclists is created, an approach seen widely across cities with high bicycle modal share. Heading south along Drumcondra Road Lower and upon reaching Drumcondra, cyclists enjoy the benefit of dedicated segregated infrastructure. This infrastructure is also present heading north from Drumcondra along Drumcondra Road Upper offering cyclists short and safe journeys south into the city centre and also north towards Whitehall.

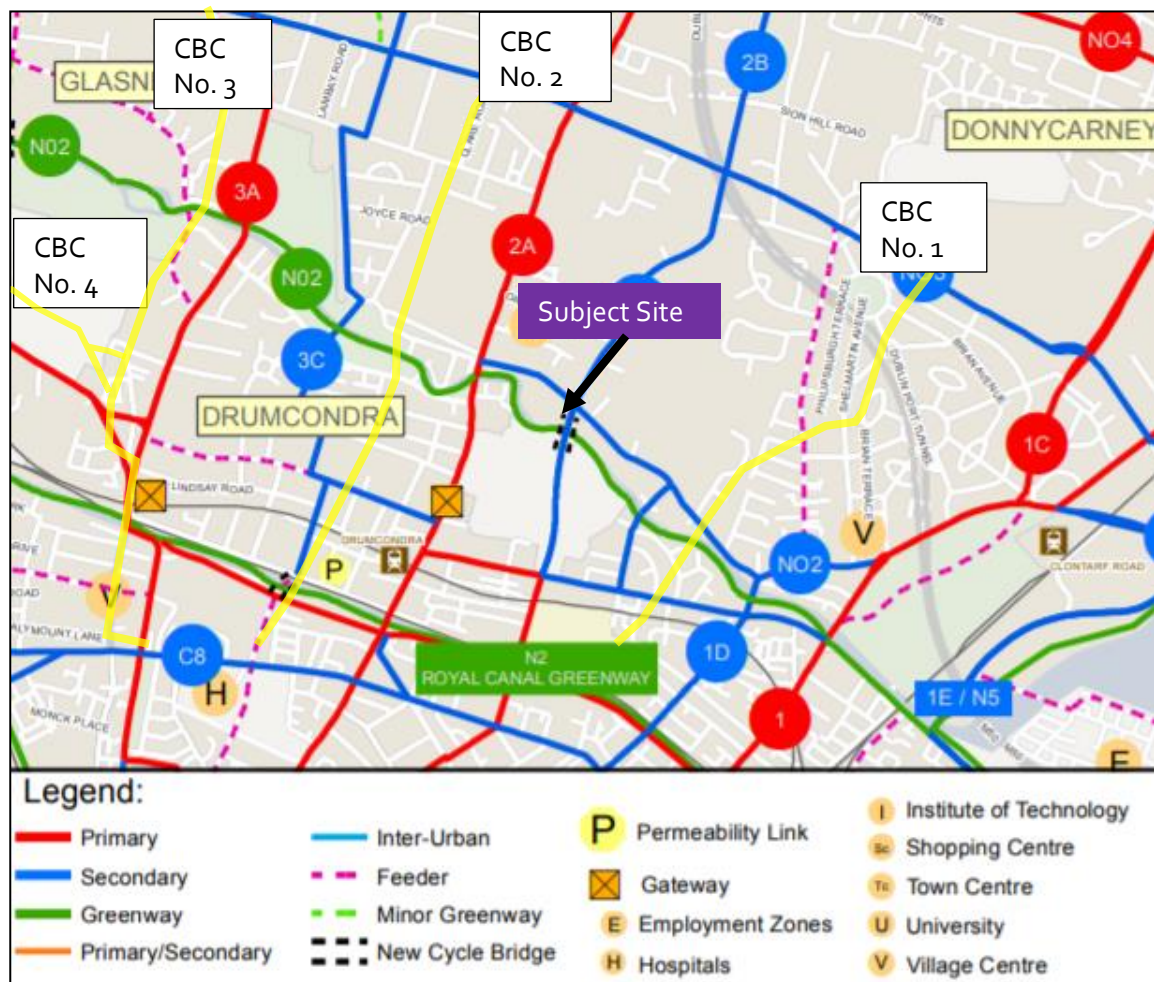


Figure 2.4: Proposed Cycling Network in the Vicinity (Core Bus Corridors Highlighted)

(Source: *NTA Greater Dublin Area Cycling Network (2013) and Busconnects.ie, annotated by Thornton O'Connor Town Planning, 2023*)

The proposed cycle network will see the proposed "*Greenway NO2*" pass to the rear of the site. Greenway NO2 is the Tolka Valley Route and is one of four orbital routes proposed, passing through Ballybough, Drumcondra, Glasnevin and Finglas South. A "*secondary route NO2*" is proposed along Richmond Road delivering much needed cycling facilities to complete the cycle route network around the subject site. Both routes will encourage future residents to avail of more sustainable forms of transport, making travelling by bicycle a safe and realistic option.

Another important cycle link in the vicinity is the Royal Canal Greenway which follows the route of the Royal Canal from the Dublin Docklands (beside the convention centre) to the western suburbs around Blanchardstown.

In summary, the subject site is well connected by public transport with a Quality Bus Corridor and Train Station accessible within c. 800 metres and c. 1.3 km respectively. There is significant cycling infrastructure nearby which is partially segregated in both directions on Drumcondra Road Lower and Upper. It is clear that there are a range of public transport options available in proximity to the subject site and the site is located within walking and cycling distance of a range of employment locations, services and facilities. It is clear that the subject scheme is appropriate to provide a reduced car parking provision of 25 No. spaces (24 No. spaces for the residential units and 1 No. space for the creche - 0.18 No. spaces per unit) as detailed throughout this Report and the DBFL Consulting Reports.

3.0 PLANNING HISTORY

3.1 Subject Site

There are no relevant planning applications pertaining to the subject site according to the Dublin City Council Online Planning Database.

3.2 Pending Decision for a Strategic Housing Development at the Adjacent Lands

There is one Strategic Housing Development ("SHD") planning application awaiting a decision at the adjacent lands to the south-west. This application was submitted by Birkey Limited which is a Group Company of Malkey Limited, the Applicant for the subject site. The SHD application represents Phase 1 of the development whilst the subject application is the Phase 2 application. Both developments can be developed independently but the intention is that they are compatible and complimentary to each other, with the two applications if granted providing a cohesive design response to the two sites.

ABP Reg. Ref.:	ABP-312352-21
Location:	Strategic Housing Development at No. 146A and Nos. 148-148A Richmond Road, Dublin 3 (Eircodes Do3 W2H1, Do3 T6Po, Do3 Y8R9, Do3 PX27, Do3 K6F7, Do3 E447 and Do3 HR27)
Application Date:	23 rd July 2022
Dev. Description:	<p>Birkey Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 0.61 hectare (c. 6,067 sq m) site at No. 146A and Nos. 148-148A Richmond Road, Dublin 3 (Eircodes Do3 W2H1, Do3 T6Po, Do3 Y8R9, Do3 PX27, Do3 K6F7, Do3 E447 and Do3 HR27). The site is bounded to the north-east by Richmond Road and the Leyden's Wholesalers & Distributor Site, to the north-west by an apartment development (Deakin Court), to the south-west by the Tolka River and to the south-east by a residential and commercial development (Distillery Lofts). Improvement works to Richmond Road are also proposed including carriageway widening and a new signal controlled pedestrian crossing facility on an area of c. 0.08 hectares (c. 762 sq m). The development site area and road works area will provide a total application site area of c. 0.69 hectares (c. 6,829 sq m).</p> <p>The proposed development will principally consist of: the demolition of all existing structures on site (c. 2,346 sq m) including warehouses and 2 No. dwellings; and the construction of a part 6 No. to part 10 No. storey over basement development (with roof level telecommunications infrastructure over), comprising 1 No. café/retail unit (157 sq m) at ground floor level and 183 No. Build-to-Rent apartments (104 No. one bedroom units and 79 No. two bedroom units). The proposed development has a gross floor area of c. 16,366 sq m over a basement of c. 2,729 sq m. The proposed development has a gross floor space of c. 15,689 sq m.</p> <p>The development also includes the construction of a new c. 126 No. metre long section of flood wall to the River Tolka along the site's southern boundary. The new flood wall is positioned at the top of the</p>

	<p>existing riverbank and will connect to existing constructed sections of flood wall upstream and downstream of the site. The top of the wall will be set at the required flood defence level resulting in typical wall heights of c. 1.2 to 2 metres above existing ground levels. The development will also include the repair and maintenance of the existing river wall on site adjacent to the River Tolka.</p> <p>The development also provides ancillary residential amenities and facilities; 71 No. car parking spaces including 8 No. electric vehicle spaces, 4 No. mobility impaired spaces and 1 No. car share space; 5 No. motorcycle parking spaces; bicycle parking; electric scooter storage; a drop off space; the decommissioning of the existing telecommunications mast at ground level and provision of new telecommunications infrastructure at roof level including shrouds, antennas and microwave link dishes; balconies facing all directions; public and communal open space; a pedestrian/bicycle connection along the north-western boundary of the site from Richmond Road to the proposed pedestrian/bicycle route to the south-west of the site adjoining the River Tolka; roof gardens; hard and soft landscaping; boundary treatments; green roofs; ESB Substation; switchroom; comms rooms; generator; lift overruns; stores; plant; and all associated works above and below ground.</p>
ABP Decision Due:	22 nd April 2022

This planning application principally providing 183 No. Build-to-Rent units and 1 No. café/retail unit comprehensively detailed why the site is suitable for higher-density development. The documentation submitted sets out how the area is well served by public transport, proximate employers, services and facilities. This is also outlined in Section 2.0 of this Report.

As well as providing public open space along the River Tolka in the form of a future Greenway, the neighbouring planning application will provide a link from Richmond Road to the future Greenway which will be a significant benefit to the surrounding community if granted. This will increase permeability in the locale and reduce journey times; a key tenet of a compact city. Please see images of the proposed adjacent scheme provided below:



Figure 3.1:
Images of the Proposed SHD Planning
Application at the Adjacent Site

(Source:
 3D Design Bureau & Mitchell +
 Associates, www.richmondroadshd.ie)



The SHD planning application comprehensively details the concerns with respect to the provision of commercial development in the Richmond Road area. Although the application proposes a café/retail unit in order to comply with the Z10 zoning objective, there has been concerns raised with the viability of any significant quantum of commercial activity in the area, which was acknowledged by Dublin City Council during the pre-planning stages of this SHD application.

It was noted in the planning application documentation that if the café/retail unit is deemed unviable in the future due to its more backland location compared to the commercial units in the subject LRD application, the unit could potentially be adapted to provide an internal resident amenity use or residential accommodation (subject to a separate planning application). This occurred at the neighbouring Deakin Court development where Dublin City Council granted permission for the change of use of 2 No. commercial units to a residential unit when no commercial occupier could be found. Please see details below in Section 3.3.

In this context, there is a requirement to now provide 30% of the site area as commercial on Z10 zoned lands (as per the newly adopted *Development Plan*). Therefore, despite our significant concerns about the viability of extensive commercial floor space at this location, as part of this submission, we have provided the 30% of the site as commercial floorspace in order to comply with the *Development Plan*. The Applicant has sought to secure end-users that will occupy the spaces in the context of both the commercial and cultural units and this is documented throughout the application.

3.3 Planning History of Surrounding Sites

3.3.1 DCC Reg. Ref. 2945/15 – Mixed-use Development of 2 No. Commercial Units and 39 No. Apartments (Deakin Court)

DCC Reg. Ref.:	2945/15
Location:	No. 144 Richmond Road, Drumcondra, Dublin 3
Application Date:	5 th June 2015
Dev. Description:	Planning permission is sought by NABCO (National Association of Building Co-Operatives Society Ltd.) for development of No. 144 Richmond Road, Drumcondra, Dublin 3, (the former Panelling Centre Site). The development will consist of a 4 No. storey mixed-use development (39 No. apartments and 2 No. commercial units) over basement car parking, i.e. 9 No. one bed apartments (61.34 sq m each), 24 No. two bed apartments (81.55 sq m - 85.24 sq m), 6 No. three bed apartments (106.39 sq m each), 1 No. Commercial Unit (29.94 sq m), 1 No. Commercial Unit (74.87 sq m), a single storey ESB substation and switchroom (20 sq m), bin stores, new pedestrian/vehicular access road from Richmond Road at the north west end of the site and access ramp to the basement car park including 32 No. car parking spaces (including. 3 No. disabled accessible spaces), 3 No. motor bike spaces, 40 No. bicycle spaces, bulk storage areas and cleaners store, new hard and soft landscaping to the front (Richmond Road) and rear (River Tolka) of the proposed development enclosed by 1.8m high double/single metal gates and railings on plinth walls, and all associated site development works.
DCC Decision Date:	19 th November 2015
DCC Decision:	Grant Permission
Final Grant Date:	11 th January 2016

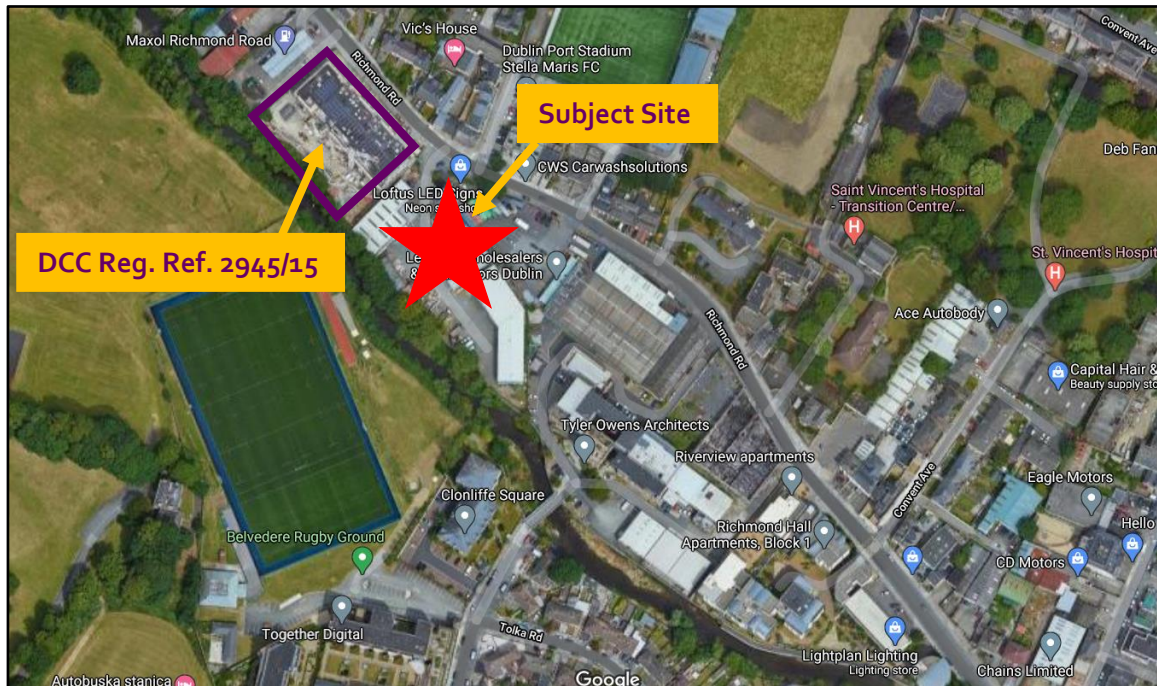


Figure 3.2: Location of Reg. Ref. 2945/15 to the North-West of the Subject Site

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021)

Under DCC Reg. Ref. 2945/15, planning permission was sought for a 4 No. storey mixed use development comprising 39 No. apartments and 2 No. commercial units at the adjacent site to the north-west (see Figure 5.1 above).

In assessing the design and urban context of the proposed development, the Dublin City Council Planning Officer noted that:

'The proposed development would represent a significant infill development on a long standing vacant site. The scale of the proposal would accord with the requirements of the development plan. It would be situated along a section of the street which lacks a coherent street frontage. The site would have a frontage of c.68m and would, by virtue of its scale and length, provide definition to the streetscape. The set back would allow for the provision of a defensible space thereby facilitating the provision of residential, family sized units at ground level and reflecting the elements of residential character on the street. The development would also cater for a more commercial element with the provision of two units, the frontage treatment of the site would be adjusted with the removal of the railed defensible space to provide a hard surface plaza. This would help to enhance the visual presence of these units on the street. The elevational treatment proposed would provide varied panels of brick, a glazed curtain wall system and rendered finishes. This would serve to break up the massing and give some variety to the streetscape.

The South Western elevation would provide substantial inset balconies which would avail of the orientation and views over the open space and river. This would render a good quality of amenity to the residents'.

In relation to the Tolka River, the Planning Officer noted the following in their assessment:

'An 8m strip would be provided along the Tolka River in accordance with the recommendation of the Richmond Road Area Action Plan, and in order to facilitate the provision of a cycle and walking route on the river bank. It is also a policy of the plan, GC9 to develop linear parks particularly along waterways, and it is a policy in any private development to secure public access along the waterway. This would provide a public open space provision of 25.7% of the site area. Access would be achieved via a pedestrian gate on the north western boundary. The public space would be separated from the semi private open space by a 1.8m high fence, which would ensure adequate privacy and security for the residents while maintaining a visual connection with the river bank'. [Our Emphasis]

The Roads Department also noted the following in relation to the *Action Area Plan for Richmond Road*:

'Richmond Road is on the list of roads to be improved within the lifetime of the current development plan. A road widening proposal for Richmond Road was included for in the draft Action Area Plan for Richmond Road. The widening of the road and provision of improved footpaths will include resurfacing works and overall environmental improvements. The submission document notes that the proposed access to the site has taken into account the proposed realignment works that are to be undertaken to Richmond Road and the location of the proposed realignment works have been shown on all planning drawings. An 8 metre set back is proposed along the Tolka to allow for a future pathway/cycleway'. [Our Emphasis]

In designing the subject scheme of the subject planning application, an 8 metre setback has also been provided from the Tolka River to the south of the subject site to allow for a riparian buffer and walking/cycle route along the river. In addition, a 2 metre strip has been provided along the Richmond Road frontage to allow for the future planned realignment of Richmond Road.

On 19th November 2015, Dublin City Council decided to Grant Permission for the proposed development, subject to 22 No. conditions. We note that in 2018 under DCC Reg. Ref. 2556/18, planning permission was granted for the change of use of the 2 No. permitted commercial units to provide a residential unit, demonstrating the potential lack of viability for commercial units in this location. Please see details below.

3.3.2 DCC Reg. Ref. 2556/18 – Change of Use of 2 No. Commercial Units to a Residential Unit (Deakin Court)

DCC Reg. Ref.:	2556/18
Location:	No. 144 Richmond Road, Drumcondra, Dublin 3
Application Date:	22 nd March 2018
Dev. Description:	Change of use from 2 No. ground floor commercial units (2.94 sq m and 74.87 sq m each), as approved under Reg. Ref. 2945/15 to 1 No. 3 bed apartment (115.32 sq m) and all associated site development works.
DCC Decision Date:	7 th September 2018
DCC Decision:	Grant Permission
Final Grant Date:	11 th October 2018

Dublin City Council stated the following in their assessment:

"In terms of the omission of the approved commercial units the Planning Authority has no strong opposition to this taking place. The viability of such units at this location on Richmond Road would be questioned given the presence of the service station adjacent with an existing small convenience retail element. In light of housing demand the addition of a further large family size apartment would be welcome. The elevational changes proposed would not affect the form and character of the overall building and generally the principle of amending the ground floor layout is reasonable.

With regard to the Z10 zoning objective of the site, and while the Planning Authority has no strong opposition to such a change, the applicant should be requested to demonstrate how the change of use complies with the zoning objective for the site in an inner suburban location where a mix of uses is preferred."

Dublin City Council requested the following information as part of a Request for Further Information:

"The site is located in an area with a Z10 zoning objective, the purpose of which is to consolidate and facilitate the development of inner city and inner suburban sites for mixed uses with residential the predominant use in suburban locations and office/retail/residential the predominant uses in inner city areas. In this context, where the site is located on the outside edge of inner city and the inside edge of inner suburban, and with the change of use of a commercial unit to residential, the applicant is requested to demonstrate how the intended change of use complies with this zoning objective."



Figure 3.3: Proposed Site Layout Plan and Location Map Under DCC Reg. Ref. 2556/18

(Source: DCC Planning Database, Extract from DCC Reg. Ref. 2556/18, 2023)

The Applicant set out in response that their main focus was to provide much needed social housing on the site.

Dublin City Council in assessing this response noted:

*'In response to Request Item 3 the applicant provides a letter from Co-operative Housing Ireland which states the belief that the change of use to residential is better suited to the provision of housing for a family requiring universal access and the size of the proposed unit lends itself to this use. It is further stated that the housing body does not have the resources, time or skills to effectively run commercial units and **there is a risk that the units, even if provided, will sit vacant.***

With regard to compliance with the Z10 zoning objectives the letter cites the presence of both residential and open space as demonstrating mixed use. The letter also states the belief that the site is inner suburban and not inner city and that the primary use as residential is appropriate.

*...While the applicant has made a poor attempt to justify the change of use from commercial to residential – open space is in no way considered to contribute to a mixed use development, commercial units can be easily operated and managed by well qualified individuals or companies – **the fact remains that the site is perhaps not best suited to having commercial activity at ground floor given location and this is a***

*factor present for most such development in the Richmond Road area. In making their argument the applicant has hit on a central concern in general which is that **any required commercial units may lie idle for a considerable period of time and this has been borne out by examples in the immediate area such as on Richmond Avenue and on Richmond Road itself.** In this context changing the use to residential, a use which will likely be immediately taken up, given the nature of the development, would be appropriate and consistent with overall Development Plan policy’.*

Therefore, it is clear that the viability for commercial units in this location is questionable as acknowledged by Dublin City Council under DCC Reg. Ref. 2556/18. These concerns were echoed by the Dublin City Council Planner at the Pre-Planning meeting for the SHD planning application. During the meeting, the Planner acknowledged that Richmond Road is a difficult area for viable retail/commercial uses.

3.3.3 DCC Reg. Ref. 4323/17 / ABP Ref. PL29N.301859 – 18 No. Unit Residential Development

DCC Reg. Ref.:	4323/17
Location:	Nos. 118 and 120 Richmond Road, Drumcondra, Dublin 3
Application Date:	21 st November 2017
Dev. Description:	The development will consist of (i) the demolition of: two storey over-basement dwelling at No. 120 Richmond Road; and two storey dwelling at No. 118 Richmond Road; (ii) Construction of 18 No. apartments in 2 No. four storey blocks over ground floor / under croft level car-parking (five storey in total), comprising: (Block A) fronting onto Richmond Road, consisting of 11 No. apartment units (3 No. one bed; 6 No. two bed; 2 No. one bed penthouse units); and (Block B) to the rear of the site comprising of 7 No. apartment units (6 No. two bed units; 1 No. three bed penthouse unit); (iii) Other works as part of the development include: all apartments with private terraces / balconies; communal landscaped open space area at the centre of the site at first floor level; under croft car and bicycle parking at ground level accessible from Richmond Road; new and upgrade to existing boundary walls and vehicular entrance along Richmond Road to include pedestrian entrance. The development will also include: boundary treatments; landscaping; SuDS drainage; and all associated site works necessary to facilitate the development.
DCC Decision Date:	23 rd May 2018
DCC Decision:	Refuse Permission
ABP Ref:	PL29N.301859
ABP Decision:	Refuse Permission



Figure 3.4: Location of the Subject Site Adjacent to Reg. Ref. 4323/17

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021)

Under DCC Reg. Ref. 4323/17, a planning application was lodged on 21st November 2017 for the demolition of: a 2 No. storey over-basement dwelling at No. 120 Richmond Road and a 2 No. storey dwelling at No. 118 Richmond Road and the construction of 18 No. apartments in 2 No. four storey blocks over ground floor / undercroft level car-parking (five storey in total).

Dublin City Council Decided to Refuse Permission for the development for the following reason:

*"The proposed development would require the demolition of two domestic dwellings, No's 118 & 120 Richmond Road. No. 118 forms part of a coherent terrace of dwellings to the west while No. 120 has considerable merit as a Victorian townhouse in its form, scale and materials and both dwellings contribute to the streetscape of this portion of Richmond Road. **The loss of these dwellings and their replacement by an apartment building of five storeys would have a detrimental impact on the visual character and form of the streetscape while the new block would constitute incoherent and piecemeal development which would continue an undesirable trend of individual sites being unilaterally redeveloped with no reference to context or an overall vision where there is considerable potential for backland development and delivery in an integrated manner.** The loss of these dwellings would have a detrimental impact on the visual character and amenities of the area and would cause serious injury to the residential amenities of the remaining houses in the terrace. The proposed unilateral development of this site and loss of existing buildings would be contrary to the policies and objectives of the current Dublin City Development Plan, in particular Section 16.10.17, and the proper planning and sustainable development of the area". [Our Emphasis]*

The Decision was appealed to An Bord Pleanála by the Applicant however the Board agreed with the assessment of the Planning Authority and refused permission for the following reason:

*"The proposed development would require the demolition of two domestic dwellings, numbers 118 and 120 Richmond Road, which contribute to the streetscape at this location. Number 118 forms part of a coherent terrace of dwellings to the west, while number 120 has considerable merit as a Victorian townhouse in its form, scale and materials. **The loss of these dwellings and their replacement by an apartment building of five storeys in height, would constitute incoherent and piecemeal development, would have a detrimental impact on the visual character and form of the streetscape and would seriously injure the visual and residential amenities of property in the vicinity.** In addition, it is considered that the proposed development would be contrary to the provisions of the Dublin City Development Plan 2016-2022, specifically paragraph 16.10.17 (retention and re-use of older buildings of significance which are not protected) and Policy QH23 (to **discourage the demolition of habitable housing unless streetscape, environmental and amenity considerations are satisfied**). The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area."* [Our Emphasis]

The subject site of this planning application only contains industrial structures, which are not of any architectural merit which would preclude their demolition.

In our professional planning opinion, the subject scheme of this planning application respects the surrounding context of the subject site, in particular the existing residential dwellings on the opposite side of Richmond Road and to the south/south-west of the subject site. The subject scheme has been designed to provide greater heights away from residential dwellings opposite on Richmond Road, with the height increasing as the site moves away from the street. In addition, the height is modulated throughout the site and a variety of materials are utilised, which provides varied and interesting facades.

3.3.4 DCC Reg. Ref. 2935/20 – 7 No. Storey Hotel at Holy Cross College Lands

DCC Reg Ref.:	2935/20
Location:	Lands off Clonliffe Road (formerly part of the Holy Cross College Lands), Clonliffe Road, Drumcondra, Dublin 3
Application Date:	29 th June 2020
Dev. Description:	The development will consist of: the construction of a 8.55m - 24.05m (above ground level) part -2 to part -7 storey 8,485 sq m hotel building comprising: (i) a lobby, bar/restaurant, kitchen and staff facilities at ground floor level; (ii) ancillary meeting room facilities including a breakout area and office, at first floor level and a gym; (iii) 200 No. bedrooms arranged over floors 1-6; and (iv) plant room, lift overrun, green roof and 19 No. photovoltaic panels enclosed by 3m screen at roof level. The hotel is served by 38 No. car parking spaces (including 2 No. universally accessible spaces), 2 No. motorcycle spaces and 28 No. bicycle spaces accessed via a new vehicular and pedestrian entrance from within the Clonliffe College lands to the northern boundary of the site which includes a turning circle for coaches. The development also includes the demolition of the existing boundary wall, repositioning of the gate piers and widening of the entrance on Clonliffe Road to

	facilitate two-way traffic, the creation of 2 No. pedestrian accesses off Clonliffe Road, and the construction of a replacement plinth boundary wall with railings along Clonliffe Road, landscaping, boundary treatments, street lighting, SuDS drainage, piped and other services, and all ancillary site development works necessary to facilitate the development (including the alteration of site levels and the upgrade of the proposed entrance from Clonliffe Road to include a pedestrian crossing and traffic lights). The development to be applied for is within the Holy Cross College landholding which includes a number of buildings on the Dublin City Council record of protected structures, including the following: the main College Building (1863); Holy Cross Church; the South Link Building; the Ambulatory; the Assembly Hall and the Red House, ref. 1901 and 1902 respectively, all at the Clonliffe College lands, Clonliffe Road, Drumcondra, Dublin 3.
DCC Decision Date:	21 st August 2020
DCC Decision:	Grant Permission subject to 24 No. conditions
ABP Ref.:	ABP-308193-20
ABP Decision Date:	8 th April 2021
ABP Decision:	Grant Permission subject to 23 No. conditions.



Figure 3.5: Location of the Subject Site in relation to DCC Reg. Ref. 2935/20

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

Under DCC Reg. Ref. 2935/20, permission was sought for a hotel development on a site approximately 350 metres to the south west of the subject site. The proposed hotel primarily consisted of 200 No. bedrooms in a part 2 No. to part 7 No. storey block.

The Dublin City Council Planning Officer's Report concluded their assessment of the proposed development as follows:

'Having reviewed the subject application, it is considered that the scale of the development is acceptable and would not seriously injure amenities the neighbouring properties which surround the application site. The proposed development would provide of high-quality modern hotel accommodation as well as an active ground floor uses, which is in compliance with the policies and objectives set out in Dublin City Development Plan 2016- 2022. Accordingly, it is considered that there are no other material considerations to outweigh a recommendation for grant of approval'.

On 21st August 2020, Dublin City Council decided to Grant Permission for the proposed development, subject to 24 No. conditions.

The decision of the Planning Authority was subject to a Third Party Appeal to An Bord Pleanála.

The Inspector's Report concluded that:

'Having regard to the Z12 Zoning Objective for the area under which hotel is a permitted use and the provisions of the Dublin City Development Plan together with the pattern, character and appearance of development in the area and the proximity to significant public transport facilities it is considered that, subject to compliance with conditions set out below, the proposed development would constitute an appropriate development in this location and would not seriously injure the amenities of the area or of property in the vicinity and would be acceptable in terms of urban design and surrounding residential amenity. The proposed development would therefore be in accordance with the proper planning and sustainable development of the area.'

On 8th April 2021, An Bord Pleanála decided to Grant Permission for the proposed hotel development, subject to 23 No. conditions.

3.3.5 ABP Reg. Ref. ABP-310860-21 – Strategic Housing Development for 1,000+ No. Build-To-Rent Apartments at Holy Cross College (www.holycrosscollegeshd.ie)

ABP Reg. Ref.:	ABP-310860-21
Location:	Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9
Application Date:	16 th July 2021

Dev. Description:	1,614 No. Build to Rent apartments, and associated site works comprising: The development will primarily consist of the demolition of a number of existing office/former college buildings on site, (c. 6,130 sq m) and the construction of a residential development with a gross floor area of c. 119,459 sq m (excluding basement parking areas) set out in 12 No. residential blocks, ranging in height from 2 No. to 18 No. storeys to accommodate 1,614 No. Build to Rent apartments with associated residential tenant amenity, 1 No. retail unit, 1 No. café, and a crèche.
ABP Decision Date:	4 th November 2021
ABP Decision:	Grant Permission subject to 36 No. conditions
Note:	We note that this scheme was recently quashed by the High Court at Judicial Review stage. However, the scheme is still referenced in the application documentation as it is expected that a new application will be lodged in relation to those lands.



Figure 3.6: Location of the Subject Site in relation to ABP Reg. Ref. ABP-310860-21 (Indicative Only)

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

Under ABP-310860-21, permission was sought for a Build-to-Rent Strategic Housing Development set out in 12 No. residential blocks ranging in height from 2 to 18 No. storeys at Holy Cross College, Clonliffe Road.

The An Bord Pleanála Inspector concluded that:

'...the proposed development would constitute an acceptable residential density at this inner suburban location and would respect the character of the area and the architectural heritage of the site, would not seriously injure residential or visual amenities if the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian and traffic safety.'



Figure 3.7: View of the Proposed Development from Richmond Road, Dublin 3

(Source: ABP Reg. Ref. ABP-310860-21, www.holycrosscollegeshd.ie)



Figure 3.8: CGI of the Proposed Development at the Holy Cross College Site

(Source: ABP Reg. Ref. ABP-310860-21, www.holycrosscollegeshd.ie)

Regarding a potential material contravention of the *Development Plan* in terms of overall height, the An Bord Pleanála Inspector stated:

"The proposed development is considered to be of strategic or national importance by reason of its potential to contribute to the achievement of the Governments policy to increase delivery of housing set out in the Rebuilding Ireland Action Plan for Housing and Homelessness 2016, and to facilitate the achievement of greater density and height in residential development in an urban centre close to public transport and centres of employment."

The Bord concluded that the development would, therefore be in accordance with the proper planning and sustainable development of the area, subject to compliance with the 36 No. conditions set out with their decision.

Permission was granted by An Bord Pleanála for the development under ABP Reg. Ref. ABP-310860-21 on the 4th November 2021, subject to 36 No. conditions. We note that this scheme was recently quashed by the High Court at Judicial Review stage. However, the scheme is still referenced in the application documentation as it is expected that a new application will be lodged in relation to the lands.

3.3.6 DCC Reg. Ref. 2957/02 – Neighbouring Site to the East/South-East

DCC Reg. Ref.:	2957/02
Location:	Unit 1.1,1.2,1.3,1.4,2,3,4a Richmond Rd., Unit 4A,4B,5B,5C Richmond Rd. Ind. Est., Richmond Road, Dublin 3
Application Date:	6 th September 2002
Dev. Description:	<p>Planning permission is sought for the change of use and material alteration including new structures to existing protected structures at Richmond Road Industrial Estate. Alterations and change of use comprise the following: Block A: Refurbishment of first, second and third floor of existing four storey office building including new window openings and new penthouse level to provide new office accommodation. Refurbishment also includes removal of existing roof and extension to the existing stair and lift tower with new external cladding and window openings. Block B Change of use to residential and refurbishment to provide 6 No. two bed apartment and 5 No. one bed apartments at first, second, third, fourth and fifth floor, including the refurbishment of the water tank to provide new penthouse level. New openings to be provided along with a new atrium space to provide new lift and stair access into Block B. Block C: Change of use to residential and refurbishment to provide two bed apartments at first, second, third floor and new office accommodation at ground floor. Refurbishment of the water tank to provide new roof garden with access from new staircase via new extension to existing stair. Refurbishment also includes new window openings. Block D: Change of use to and refurbishment to provide new office accommodation within new ground, first and second floors, removal of existing roof and provision of new penthouse level office accommodation. New atrium to be provided, housing new lift and stair access, along with new emergency stair. New window openings to be provided. Block E: Change of use to and refurbishment to provide 12 No. two bed apartments and 4 No. one bed apartments within new ground, first, two second, third, fourth and new penthouse level, provision of new stair and lift tower and new door access and window openings. Provision of new ramped access to new atrium area and removal of existing roof to entrance porchway to provide for new lift access. Improvement to external works to provide 38 No. carparking spaces and refurbishment of existing access bridge and all associated external site works.</p>
DCC Decision Date:	12 th March 2003
DCC Decision:	Grant Permission subject to 12 No. conditions.

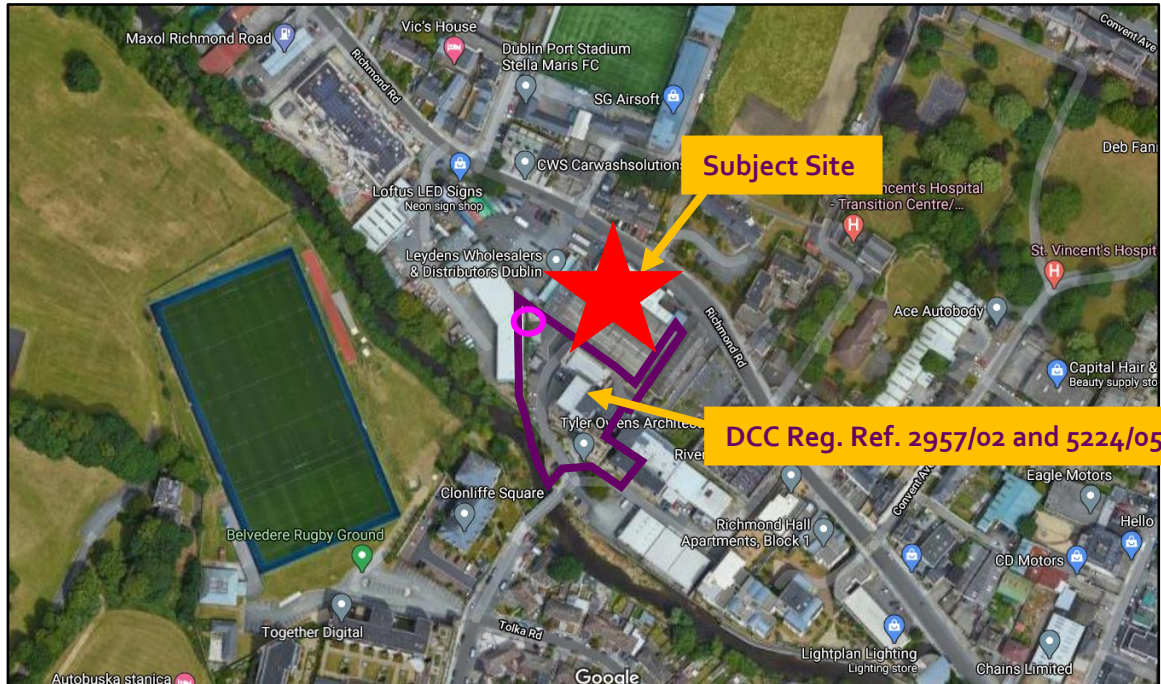


Figure 3.9: Location of the Subject Site Adjacent to Reg. Ref. 2957/02

(Source: Google Maps and Dublin City Council Online Planning Database, annotated by Thornton O'Connor Town Planning, 2023)

Permission was originally granted for a part 4 No. to 5 No. storey residential and commercial development under DCC Reg. Ref. 2957/02 at the site to the south-east of the subject lands.

Under DCC Reg. Ref. 5224/05, permission was granted for amendments to the scheme including the change of use of commercial units to live/work units, redesign of some residential units and in addition, a new 7 No. storey building was granted permission at the site.

As annotated by the pink circle in Figure 5.10 above it appears from Google Maps that the permitted 7 No. storey structure was never constructed at the lands however this decision demonstrates the potential for increased height in the area.

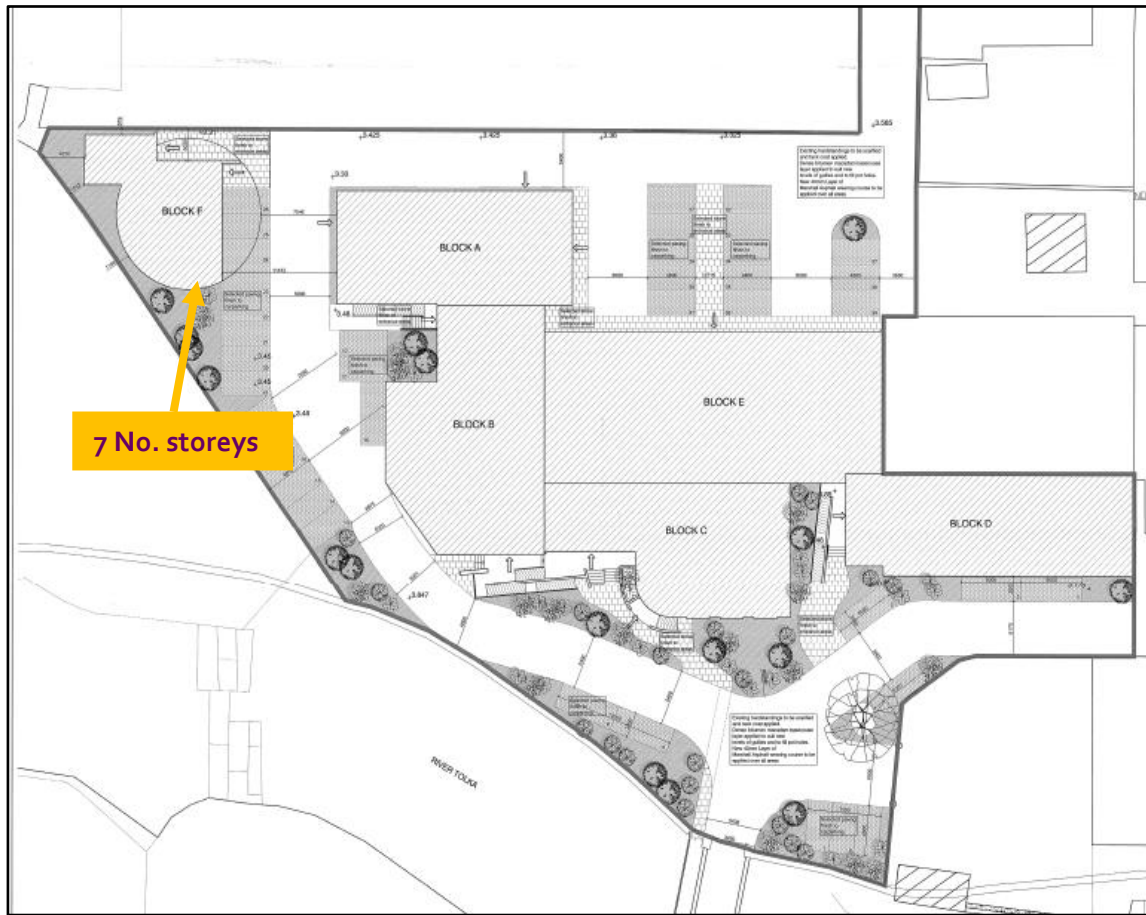


Figure 3.10: Site Layout Plan of DCC Reg. Ref. 5224/05

(Source: Dublin City Council Online Planning Database, annotated by Thornton O'Connor Town Planning, 2023)

The Planning Officer noted the following in relation to the 7 No. storey building:

"The proposed new building would also I consider be an addition to the site and because of it's cylindrical shape and slim design it would not detract from the protected structures and would harmonise with the overall site."

In this regard, we note that this 7 No. storey structure was positioned directly adjacent to the subject site boundary. Please see Figure 5.12 below for images of the neighbouring site with and without the permitted structure:

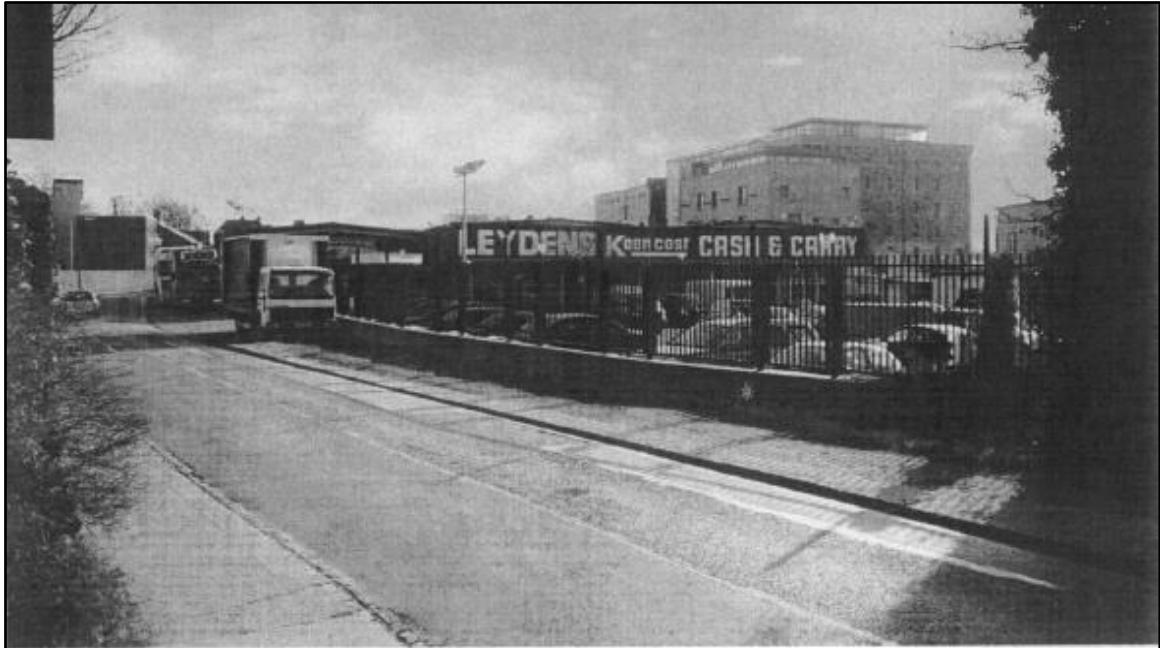


Image 3 (Before)

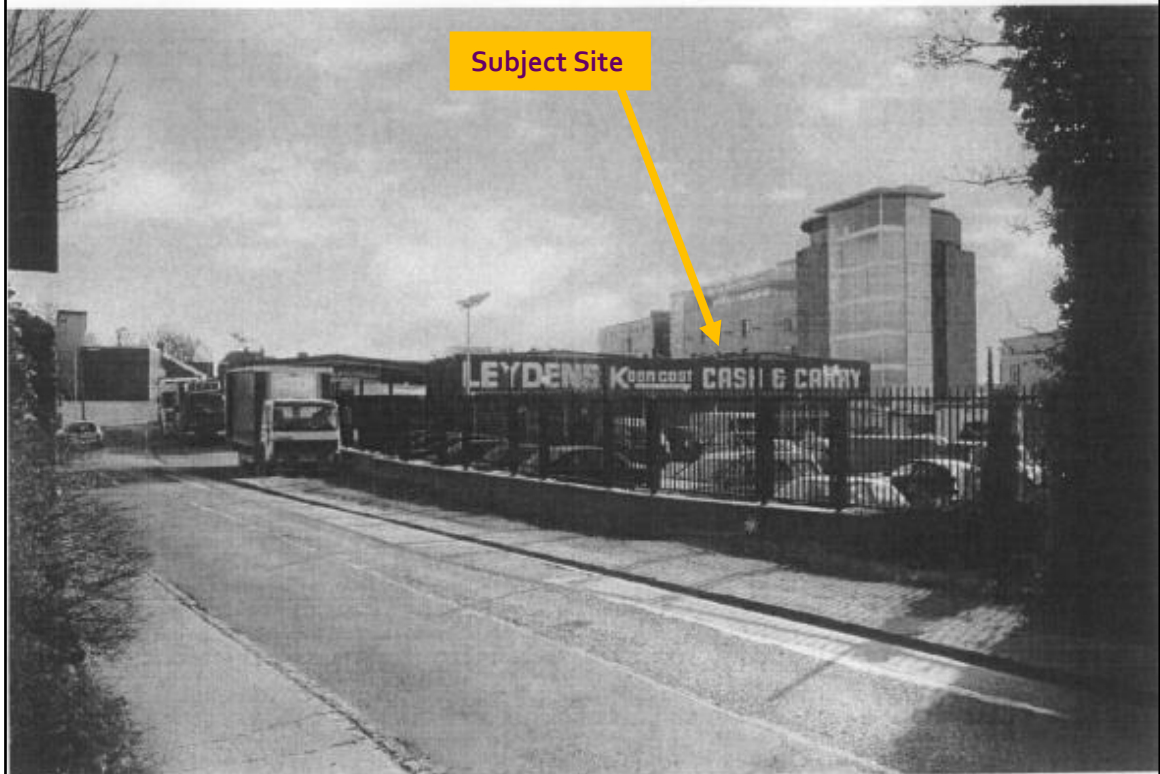


Image 3 (After)

Figure 3.11: Photomontage of the Permitted New 7 No. Storey Building Adjacent to the Site Boundary

(Source: Dublin City Council Online Planning Database, annotated by Thornton O'Connor Town Planning, 2023)

Under DCC Reg. Ref. 3151/13, planning permission was granted to retain amendments made to the permitted DCC Reg. Ref. 2957/02 including the reconfiguration of the ground floor to incorporate storeroom, gym and pool and reconfiguration of the upper-level apartments. Under DCC Reg. Ref. 2607/14, planning permission was granted for the change of use of a ground floor office unit to a residential unit.

The Planning Officer in their report noted the following:

"In the context of the majority of the Corn House building being in residential use and given the office unit is self-contained with its own entrance, but also at a remove from any other office accommodation in the immediate area, permitting the change of use from office to residential, in this specific instance, would not contradict the zoning objective for the area. This application would not set a precedent for the change of use of any other unit in the development given the site-specific circumstances."

Under DCC Reg. Ref. 4913/07, planning permission was granted for the redevelopment of a derelict building (Protected Structure) at the site shown in Figure 5.13 below, which involved the renovation of the building into a 30 No. bedroom short-term respite/convalescent day-care facility (7 No. storeys in total).



Figure 3.12: Location of the Subject Site Adjacent to DCC Reg. Ref. 4913/07

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2023)

3.4 Summary of Planning History

In summary, it is our opinion from reviewing the surrounding planning history of the area, that increased height can be absorbed into the receiving environment. The subject scheme of this planning application seeks to appropriately densify this key underutilised site in an intermediate urban location. The proposed development comprises artist studios, a retail unit, a gym and a creche in addition to 133 No. residential units, which will provide for a mix of uses, maintaining an active street frontage along Richmond Road, whilst also providing much needed residential units to contribute positively towards addressing the national housing crisis. We reiterate the challenges associated with provided commercial development along Richmond Road. However it is our opinion that the scheme has taken the opportunity to activate the streetscape whilst providing a commercial units that are flexible and have some opportunity for viability, in accordance with the Z10 zoning objective.

4.0 PROPOSED DEVELOPMENT

4.1 Description of the Proposed Development

Malkey Limited intend to apply for permission for development (Large-scale Residential Development (LRD)) at this c. 0.55 hectare site at the former Leydens Wholesalers & Distributors, No. 158A Richmond Road, Dublin 3, D03 YK12. The site is bounded to the north-east by Richmond Road, to the west/south-west by No. 146A and Nos. 148-148A Richmond Road (pending application ABP Reg. Ref. TA29N.312352), to the south/south-west by a residential and commercial development (Distillery Lofts) and to the east/south-east by the Former Distillery Warehouse (derelict brick and stone building). Improvement works to Richmond Road are also proposed including carriageway widening up to c. 6 metres in width, the addition of a c. 1.5 metre wide one-way cycle track/lane in both directions, the widening of the northern footpath on Richmond Road to a minimum of c. 1.8 metres and the widening of the southern footpath along the site frontage which varies from c. 2.2 metres to c. 7.87 metres, in addition to a new signal controlled pedestrian crossing facility, all on an area of c. 0.28 hectares. The development site area and road works area will provide a total application site area of c. 0.83 hectares.

The proposed development will principally consist of: a Large-scale Residential Development (LRD) comprising the demolition of existing industrial structures on site (c. 3,359 sq m) and the construction of a mixed-use development including artist studios (c. 749 sq m), a creche (c. 156 sq m), a retail unit (c. 335 sq m), and a gym (c. 262 sq m), and 133 No. residential units (65 No. one bed apartments and 68 No. two bed apartments). The development will be provided in 3 No. blocks ranging in height from part 1 No. to part 10 No. storeys as follows: Block A will be part 1 No. storey to part 4 No. storeys in height, Block B will be part 1 No. storeys to part 10 No. storeys in height (including podium) and Block C will be part 1 No. storeys to part 9 No. storeys in height (including podium). The proposed development has a gross floor area of c. 14,590 sq m and a gross floor space of c. 13,715 sq m.

The development also proposes the construction of: a new c. 204 No. metre long flood wall along the western, southern and south-eastern boundaries of the proposed development with a top of wall level of c. 6.4 metres AOD to c. 7.15 metres AOD (typically c. 1.25 metres to c. 2.3 metres in height) if required; and new telecommunications infrastructure at roof level of Block B including shrouds, antennas and microwave link dishes (18 No. antennas enclosed in 9 No. shrouds and 6 No. transmission dishes, together with all associated equipment) if required. A flood wall and telecommunications infrastructure are also proposed in the adjoining Strategic Housing Development (SHD) application (pending decision ABP Reg. Ref. TA29N.312352) under the control of the Applicant. If that SHD application is granted and first implemented, no flood wall or telecommunications infrastructure will be required under this application for LRD permission (with soft landscaping provided instead of the flood wall). If the SHD application is refused permission or not first implemented, the proposed flood wall and telecommunications infrastructure in the LRD application will be constructed.

The proposed development also provides ancillary residential amenities and facilities; 25 No. car parking spaces including 13 No. electric vehicle parking spaces, 2 No. mobility impaired spaces and 3 No. car share spaces; 2 No. loading bays; bicycle parking spaces; motorcycle parking spaces; electric scooter storage; balconies and terraces facing all directions; public and communal open space; hard and soft landscaping; roof gardens; green roofs; boundary treatments; lighting; ESB substation; switchroom; meter room; comms

rooms; generator; stores; plant; lift overruns; and all associated works above and below ground.



Figure 4.1: CGI of the Proposed Development

(Source: 3D Design Bureau, 2023)

The *Architectural & Urban Design Statement* by RKD Architects and *Landscape Planning Report* by Mitchell + Associates Landscape Architecture are enclosed as separate documents, which set out the high-quality design of the scheme which has comprehensively considered the surrounding context while appropriately densifying this underutilised accessible site.

4.2 Key Site Statistics

Key Site Statistics	
Site Area	<p>Total Red Line Application Boundary: c. 0.83 Ha (c. 8,256 sq m) and is broken down as follows:</p> <ul style="list-style-type: none"> 'Developable' Site Area: c. 0.55 Ha (c. 5,500 sq m) Road works to Richmond Road: c. 0.28 Ha (c. 2,756 sq m)
Existing / Demolition Gross Floor Area	c. 3,359 sq m
Proposed Gross Floor Area	c. 14,590 sq m
Proposed Gross Floor Space	c. 13,715 sq m

Number of Residential Units Proposed	133 No. (65 No. one beds and 68 No. two beds apartments)
Retail	c. 335 sq m
Creche	c. 156 sq m
Gym	c. 262 sq m
Artist Studios	c. 749 sq m
Dual Aspect Units	93 No. units (70%)
Plot Ratio	2.65
Site Coverage	73% (59% excluding podium communal open space)
Proposed Density	244 No. units per hectare
Maximum Height	Block A: c. 15.9 metres Block B: c. 35.175 metres Block C: c. 32.025 metres
Public Open Space	606 sq m
Communal Open Space	1,480 sq m
External Open Space – Artist Studios	173 sq m
External Open Space – Creche	43 sq m
Car Parking	25 No. spaces including: <ul style="list-style-type: none"> • 13 No. electric vehicle parking spaces • 2 No. mobility impaired spaces; and • 3 No. car share spaces
Bicycle Parking	424 No. spaces including 2 No cargo spaces
Electric Scooter Storage	10 No. spaces
Motorcycle Parking	7 No. spaces

4.3 Demolition

The proposed development includes the demolition of all existing warehouse structures on the subject site. The existing industrial structures on the subject site are not Protected Structures and do not have any architectural merit.

4.4 Residential Units

The following is the proposed schedule for the 133 No. dwellings within the subject scheme:

Apartment Schedule			
1 No. Bedroom	2 No. Bedroom (3-person)	2 No. Bedroom (4-person)	Total
65	9	59	133
(49%)	(7%)	(44%)	(100%)

4.5 Artist Studios

The provision of artist studios in the ground floor of Block A will be a significant gain for the area, especially as the Richmond Road artists who will occupy the studios had to vacate a nearby premises and the Applicant has engaged with them to provide new studios at the subject site. The scheme proposes 17 No. artist studio rooms in addition to an exhibition area and communal space with a shared kitchen area. Some of the units are also larger in size to allow artists to work collaboratively if required. The studios will activate the streetscape and the exhibition area will open out onto the public open space to the west of the development, which will provide an animated frontage, an attractive and safe environment and will also improve legibility and the public realm for the area.

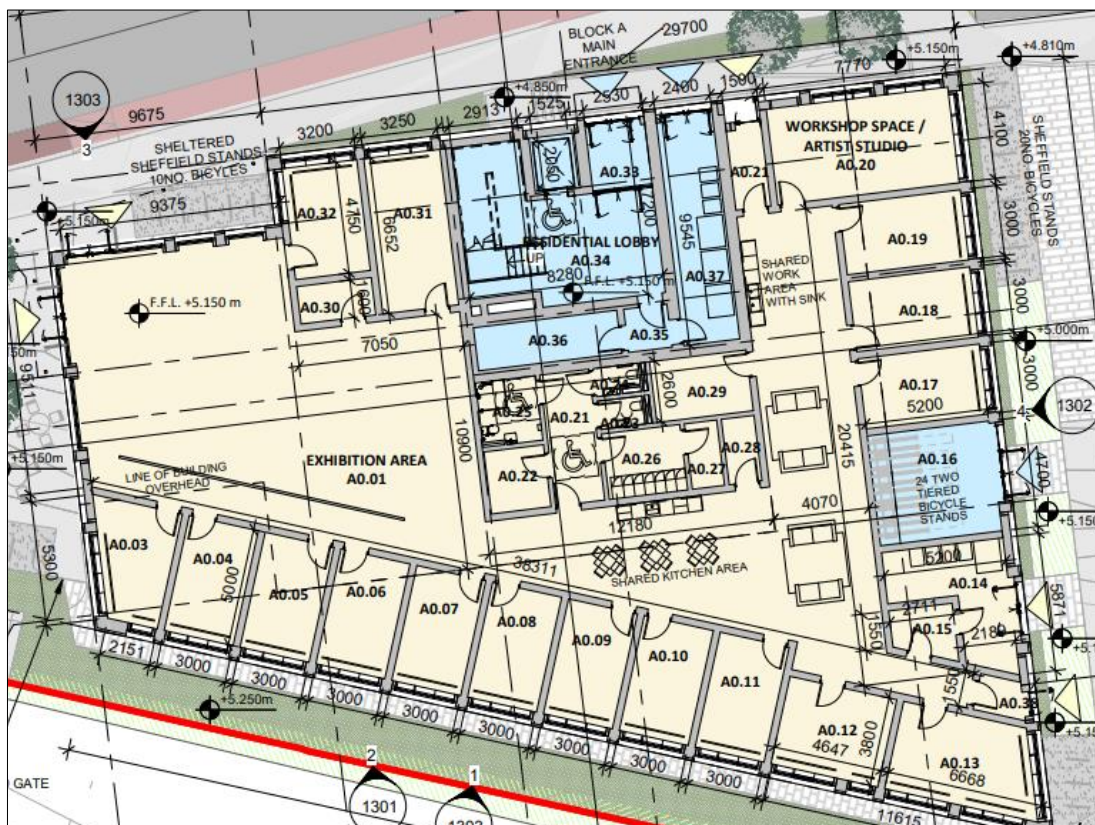


Figure 4.2: Floor Plan of the Proposed Artist Studios

(Source: RKD Architects, 2023)

4.6 Creche

The proposed development will provide a creche (c.156 sq m) within the ground floor of Block B and will cater for c. 35 No. children. This crèche will contain 2 No. classrooms, kitchen and a reception/office and includes a dedicated open space area (43 sq m) for staff and children to utilise. The creche entrance is accessed from the public open space between Blocks A and B/C and thus this will ensure this space will be active as it will attract users to the open space.

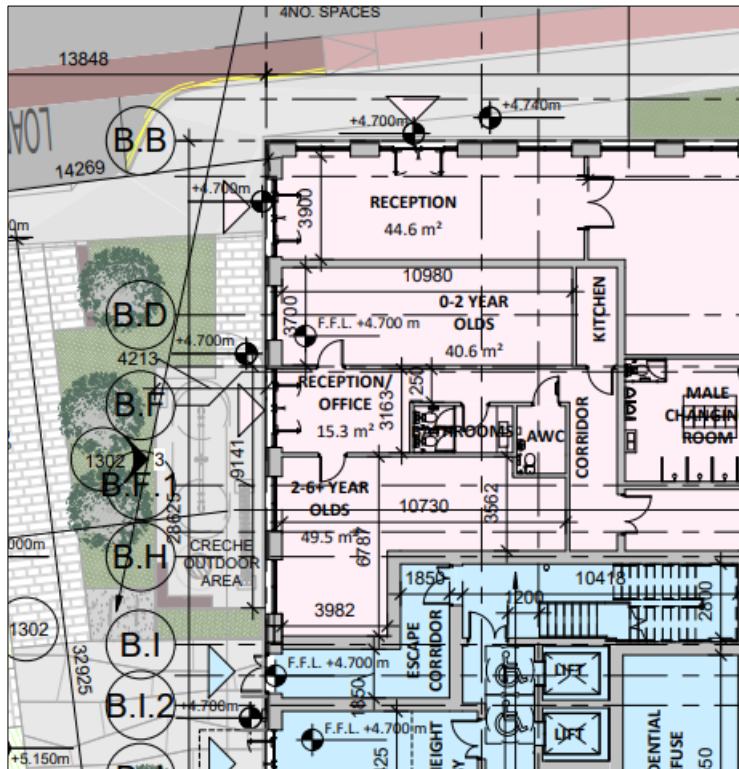


Figure 4.3: Floor Plan the Proposed Creche

(Source: RKD Architects, 2023)

4.7 Retail Unit

The subject scheme also includes the provision of retail floorspace at ground floor level of Block B/C along the Richmond Road frontage. The retail unit at ground floor will bolster the active street frontage along the Richmond Road with the added benefit of passive surveillance along the street.

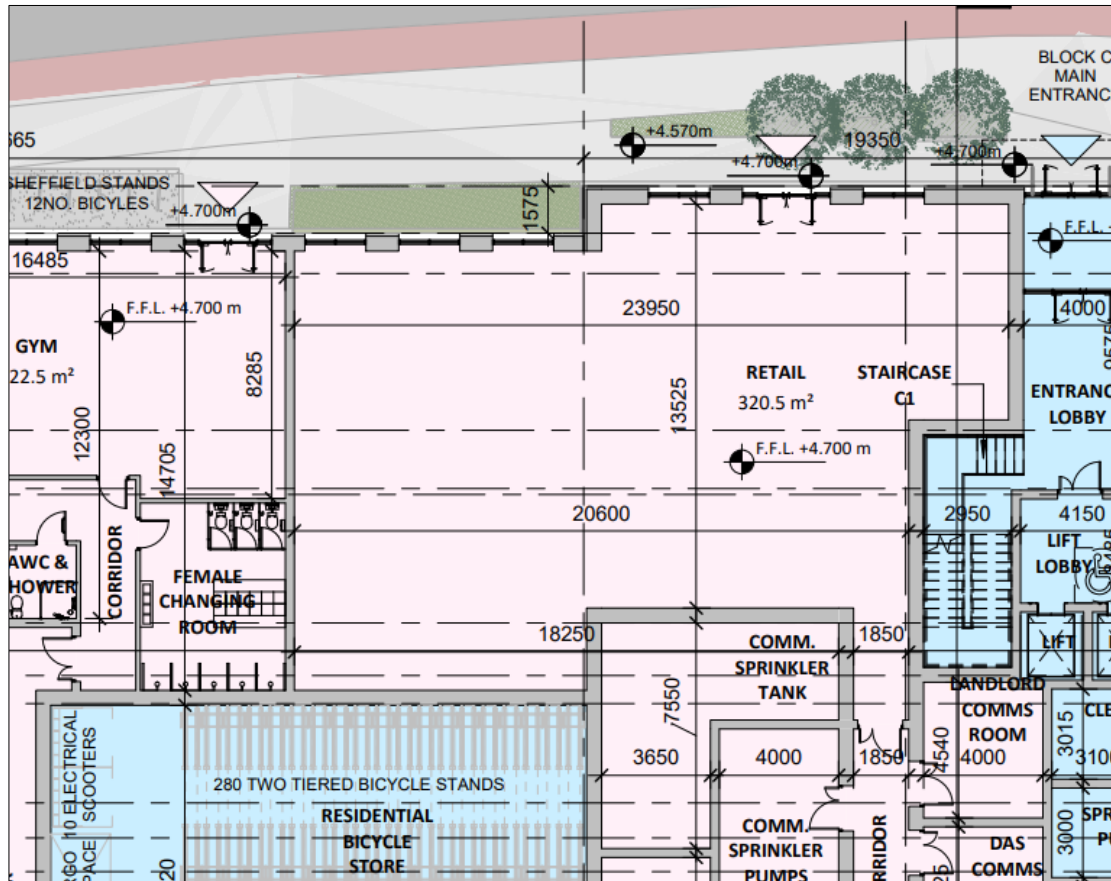


Figure 4.4: Floor Plan the Proposed Retail Unit

(Source: RKD Architects, 2023)

4.8 Gym

The proposed development includes a gym which is located at the corner of Block B/C and the entrance will be from the corner of the public open space within the site. This location of this gym will augment the passive surveillance along the streetscape and will introduce animation and activity along this portion of Richmond Road. People visiting the gym will also be enticed to utilise the public open space area provide adjacent to the gym entrance which will assist in providing a safe and enjoyable open space for all users. We note that the gym will be available for the public and for future residents of the scheme.

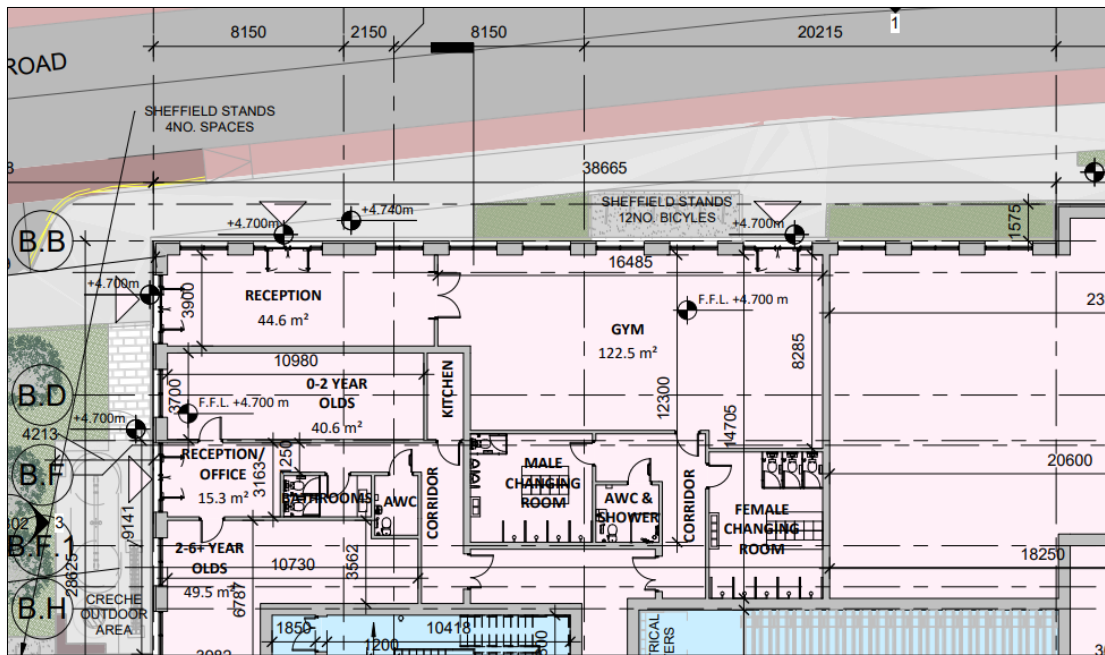


Figure 4.5: Floor Plan the Proposed Gym

(Source: RKD Architects, 2023)

4.9 Landscaping Strategy

Public Open Space

The subject scheme includes the provision of 606 sq m of public open space located to the west of Block A and between Blocks B and C, representing 11% of the developable site. It is intended that the scheme will operate in tandem with the public open space provided in Phase 1 (decision pending) albeit both Phases 1 and 2 can be developed independently. The composite open spaces will be a significant planning gain for the area. The total public open space figures are provided below:

	Site Area (sq m)	POS Proposed (sq m)	Percentage
Phase 1 Public Open Space (ABP Reg. Ref. TA29N.312352)	6,067	1,501	25%
Phase 1 Additional Public Plaza (ABP Reg. Ref. TA29N.312352)	6,067	198	3%
Phase 2 Public Open Space (Subject Application)	5,500	606	11%
Total	11,567	2,305	17.85%



Figure 4.6: Comparison of Open Space Proposed Under Phase 1 and 2 Combined and Phase 2 as a Standalone Document

(Source: RKD Architects, 2023)

Communal Open Space

In addition to the public open space provision, the development proposes to provide 1,008 sq m outdoor high-quality landscaped communal amenity space at podium level in the development, in addition to communal roof terraces measuring 472 q m (see Figure 4.6 above). The communal open space also includes a children's play space in the communal podium between Block B and Block C in addition to the creche outdoor play area located at surface level between Blocks A and B.



Figure 4.7: View of Communal Open Spaces

(Source: RKD Architectural & Urban Design Report, 2023)

4.10 Building Height

The height of the subject scheme is modulated throughout the site and includes the following maximum heights:

Block	Storeys	Max Height
Block A	Part 1 to 4 No. storeys	c. 15.9 metres
Block B	Part 1 to 10 No. storeys	c. 35.175 metres
Block C	Part 1 to 9 No. storeys	c. 32.025 metres

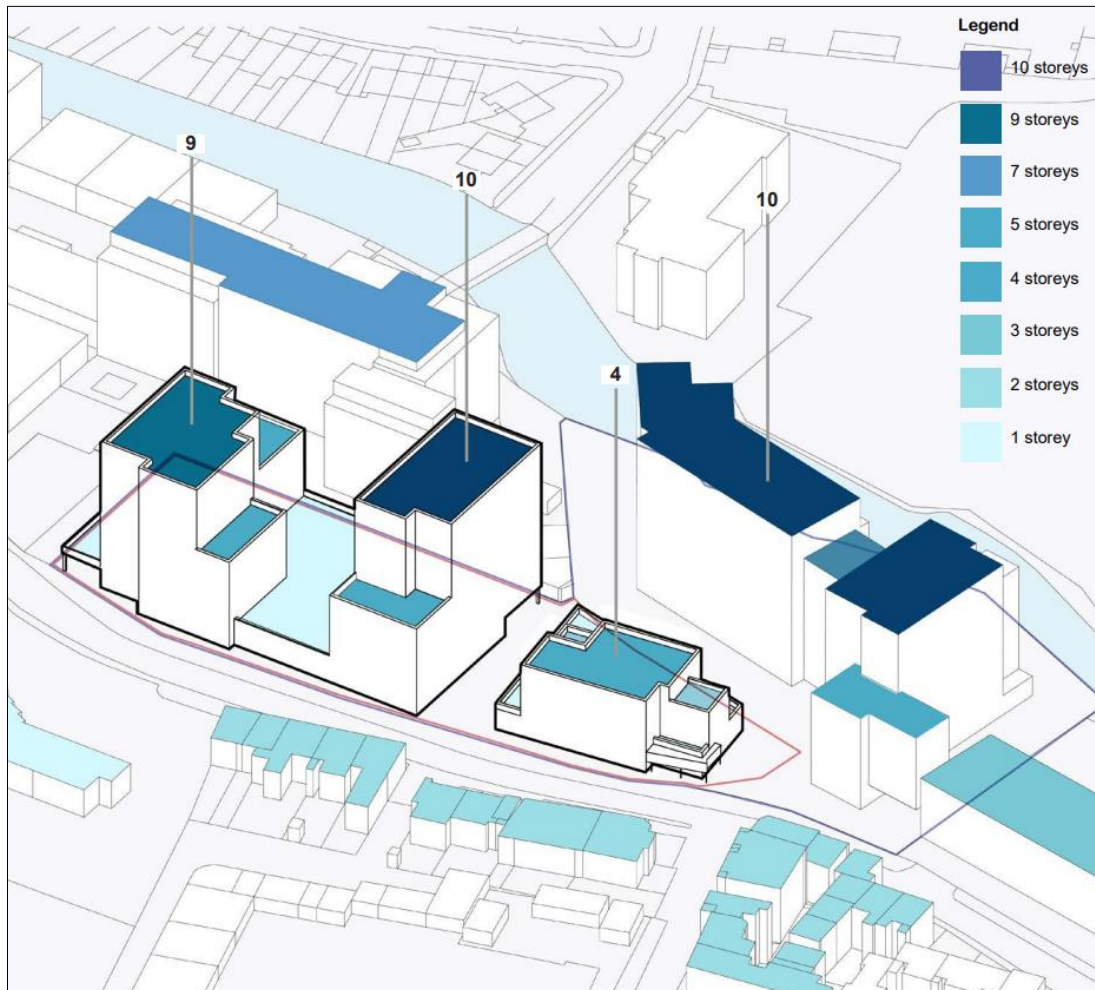


Figure 4.8: Map Showing Indicative Heights Proposed in the Subject Scheme

(Source: RKD Architectural & Urban Design Report, 2023)

The height of the subject scheme modulates throughout the site in the form of 3 No. linear blocks provided in a north-south direction sitting 90 degrees to Richmond Road. This will provide the majority of the units with easterly and westerly aspects. The provision of these slender blocks with the gable end fronting onto Richmond Road will break down the massing of the development, which will provide extensive opportunities for views into and out of the site whilst allowing the development to breathe.

Block A is lower in height (up to 4 No. storeys) which ensures that the height transitions across the site from the Phase 1 development, with a pop-up 9 and 10 No. storey element

provided in Blocks B and C. The greater heights are proposed away from residential dwellings opposite on Richmond Road, with the height increasing as the site moves away from the street. In addition, the height is modulated throughout the site and a variety of materials are utilised, which provides varied and interesting facades.

We consider that increased height can be assimilated into the surrounding area especially having regard to the high quality architectural composition of the scheme and the site's receiving context. The *National Planning Framework ("NPF")* and the *Urban Development and Building Height Guidelines for Planning Authorities, December 2018 ("Building Height Guidelines")*, both encourage the provision of increased height and increased density in appropriate core urban locations in order to create a more consolidated urban form and counteract urban sprawl.

4.11 Separation Distances

The separation distances of the scheme to the surrounding buildings and proposed structures are demonstrated on the Site Plan prepared by RKD Architects.

The proposed development provides various separation distances from the proximate buildings and proposed structures. The RKD Architects drawings demonstrate the separation distances provided such as on Dwg No. 22001-RKD-ZZ-00-DR-A-1002A which include c. 25 metres between Block A and Richmond Road dwellings, c. 18 metres between Block A and Phase 1, c. 16.7 metres between Block B and Richmond Road dwellings (across the road network).

The separation distances increase as the development increases in height with the provision of various setbacks. Therefore, the proposal avoids overlooking, overbearance and resultant impacts on residential amenity and privacy of neighbouring properties.

The *Architectural & Urban Design Statement* prepared by RKD Architects notes the following:

"The scheme has been designed with maximising the potential of adjoining potential redevelopment sites.

Phase 1 is currently awaiting planning approval. This scheme is designed with the assumption that phase 1 will be built, therefore the appropriate setbacks have been achieved to ensure appropriate distances between private balconies (a minimum of 22m). At podium level, the private terraces which adjoin the communal open space of the proposal is further screened with planting.

The site to the southeast of the subject site along Richmond Road is currently derelict. The proposed development is set back 12m from the centreline of the road into the Distillery Lofts. This means that any proposed development on this adjacent site could use the same strategy to achieve a 22m set back between two developments."

Particular consideration has been given to the relationship between the scheme and the Distillery Building Protected Structure to the south of the site. For example, as illustrated on the image below, the communal open spaces at the upper levels have been provided at the closest locations to the Protected Structure to ensure appropriate setbacks have been provided between the proposed and existing structures. As demonstrated on the inset image, it is submitted that the element of the Protected Structure sitting closest to the subject site is of poorer quality, however the scheme is still appropriately setback from the entire Protected Structure with the provision of a large quantum of communal open spaces.

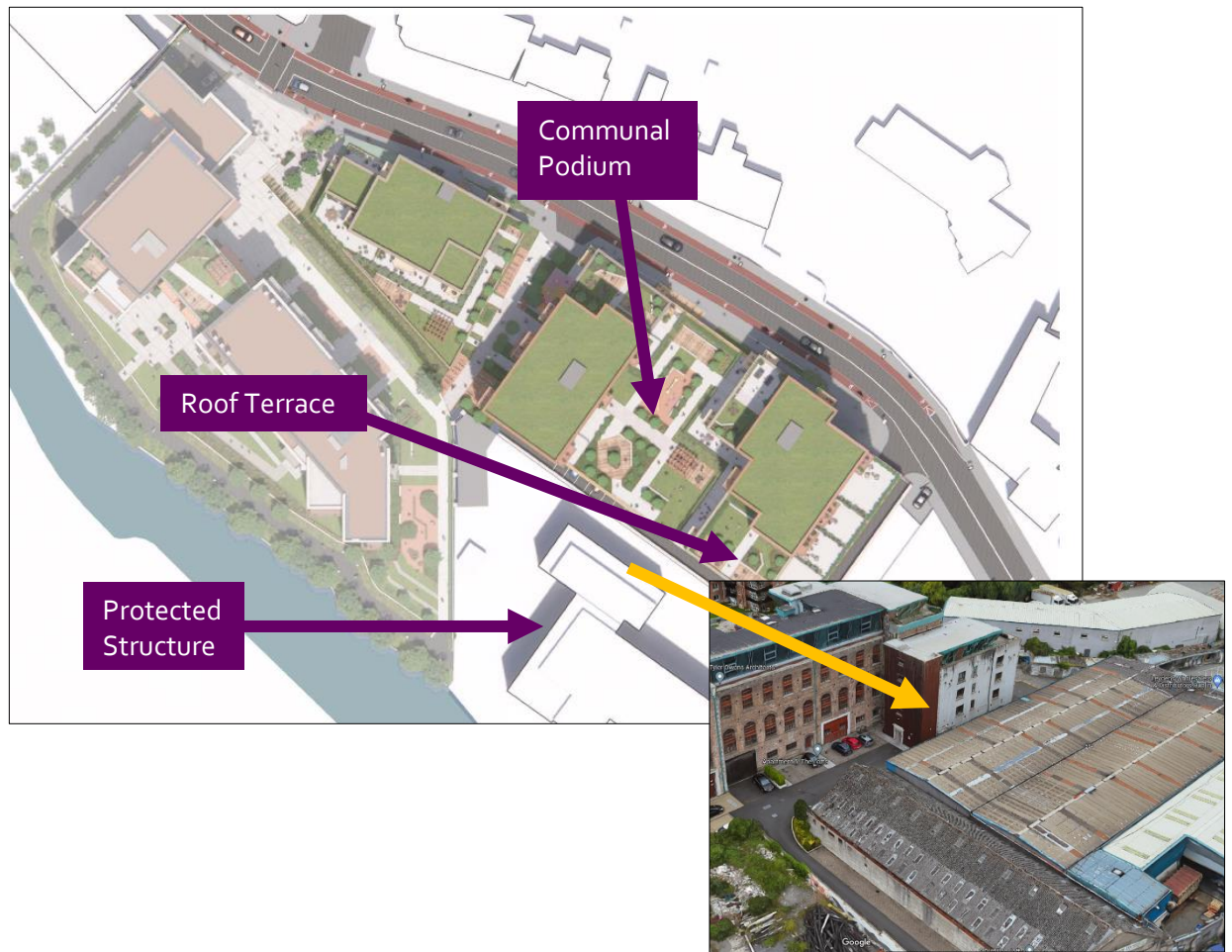


Figure 4.9: Image from Landscape Planning Report Illustrating the Appropriateness of the Setbacks Provided Between the Scheme and Distillery Building [Inset Showing Neighbouring Protected Structure]

(Source: Mitchell + Associates and Google Maps, 2023)

4.12 Materials

The *Architectural & Urban Design Report* prepared by RKD Architects, sets out a full description of the materials proposed for the subject scheme which is provided below in summary:

Proposed Block A Materials:

- Light Buff Stone
- Light Buff Brick
- Light Buff Feature Stone
- Light Buff Brick Soldier Course
- Light Buff Stone Panel
- Light Golf Metalwork
- Aluminium Window



Figure 4.7: Proposed Block A Materials

(Source: RKD Architectural & Urban Design Report, 2023)

Proposed Block B Materials:

- Dark Buff Stone
- Grey Brick
- Dark Buff Feature Stone
- Grey Brick Soldier Course
- Dark Buff Stone Panel
- Dark Gold Metalwork
- Aluminium Window
- Metal Screen



Figure 4.8: Proposed Block A Materials

(Source: RKD Architectural & Urban Design Report, 2023)

Proposed Block C Materials:

- Dark Buff Stone
- Red Brick
- Dark Buff Feature Brick
- Dark Buff Brick
- Light Buff Brick
- Dark Buff Feature Stone
- Red Brick Soldier Course
- Dark Buff Brick Soldier Course
- Light Buff Brick Soldier Course
- Buff Stone Panel
- Dark Buff Stone Panel
- Light Buff Stone Panel
- Metal Screen
- Red Metalwork
- Dark Gold Metalwork
- Light Gold Metalwork
- Aluminium Window

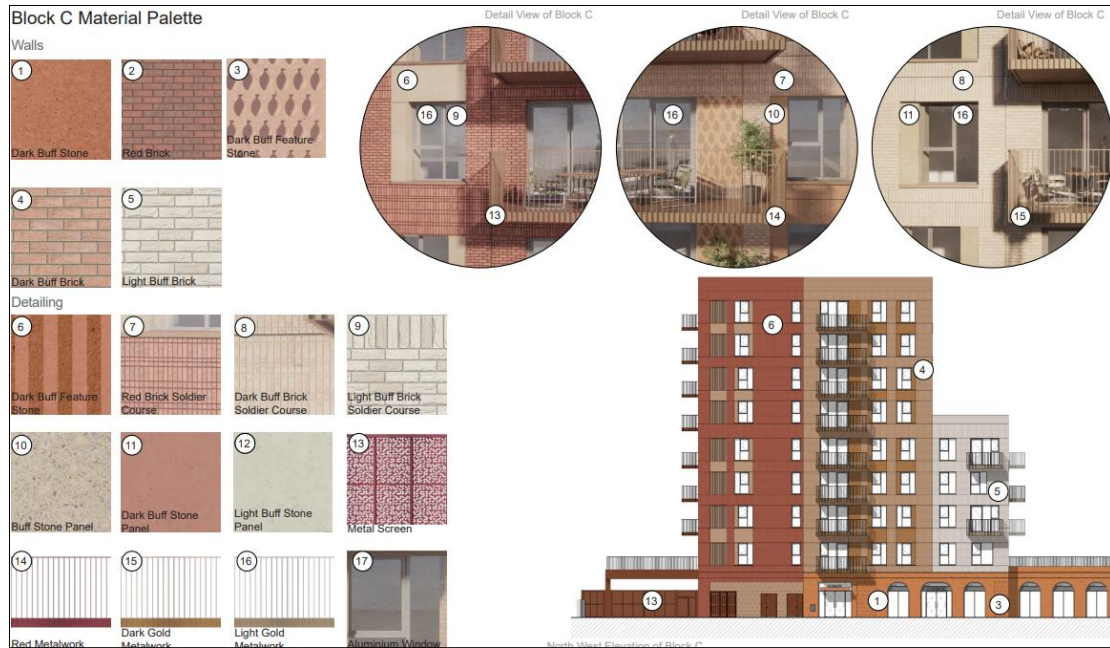


Figure 4.9: Proposed Block A Materials

(Source: **RKD Architectural & Urban Design Report, 2023**)

4.13 Car Parking

The subject scheme includes the provision of 25 No. car parking spaces, including 24 No. for the residential units and 1 No. for the creche unit, which equates to a ratio of 0.18 No. spaces per residential unit. There is no car parking proposed for the other commercial elements or the cultural use. In addition, a loading bay is provided internal to the site and an additional loading bay is provided on Richmond Road. Some 13 No. electric vehicle parking spaces are provided and 3 No. car share spaces.

Having regard to the locational characteristics of the site in proximity to public transport, employment, services and facilities, the subject scheme includes a reduced level of car parking provision, which encourages sustainable modes of transport. The retail, creche, gym and artist studios are intended to serve the local community therefore the scheme does not require dedicated parking spaces. There is one staff parking space provided for the creche unit.

The 25 No. car parking spaces include:

- 24 No. standard resident spaces including 3 No. car share spaces, 2 No. mobility impaired spaces and 13 No. electric vehicle spaces.
- 1 No. creche car parking space.

By providing a reduced level of car parking provision, the subject scheme seeks to encourage future residents to either walk or cycle to Drumcondra Village and the city centre and all of the amenities contained therein or avail of the high-quality public transport in close proximity to the subject site. Therefore, the reduced provision of car parking for the subject scheme will contribute to consolidated growth and the reduction in carbon emissions.

The car parking spaces are provided to the rear of the site accessed towards the east of the site from Richmond Road, removing any views of car-parking spaces. Therefore, there will be limited vehicular access in the subject site, which prioritises pedestrian and cyclist movements.

4.14 Bicycle Parking

The subject scheme includes the provision of 424 No. bicycle parking spaces as follows:

- Residential: 306 No. spaces including 2 No. cargo spaces
- Residential Visitor: 65 No. visitor spaces
- Retail: 5 No. long stay spaces and 3 No. short stay spaces
- Artist Studios: 14 No. long stay spaces and 8 No. short stay spaces
- Creche: 7 No. long stay spaces and 6 No. short stay spaces
- Gym: 4 No. long stay spaces and 6 No. short stay spaces

In addition, some 10 No. electric scooter spaces will be provided. The bicycle parking provision is significantly in excess of the standards outlined in the *Development Plan* and the *Apartment Guidelines, 2022*.

4.15 Flood Wall

As detailed in the Statutory Notice, the development proposes the provision of a flood wall along the western, southern and south-eastern boundaries of the proposed development in the event that the flood wall proposed in the adjoining SHD (pending decision ABP Reg. Ref. TA29N.312352) is neither granted nor implemented before this application commences development. Both applications are under the control of the Applicant's parent company and if both are granted are intended to be built together.

On the preferred basis that the flood wall is not required as part of the subject application as it will have already been provided as part of the Phase 1 SHD application along the river bank (its more natural location), an approach favouring soft landscaping will be used between Phase 1 (SHD) and 2 (LRD). The soft-landscaping approach will comprise grass and shrub planting of between 40 to 100 centimetres, allowing for the creation of a vegetative buffer adjoining Block A. A gate will also be provided between the two phases at the end of the central courtyard of Phase 2 between Buildings A and B, creating a physical link between Phases 1 and 2. Phase 1 landscaping will be amended if granted permission to facilitate access between both schemes.

Except where referenced, all assessments carried out are based on the worst-case scenario, i.e. the provision of the flood wall as this is more invasive than the soft-landscaping option.

4.16 Telecommunication Infrastructure

As detailed in the Statutory Notice, the development proposes the provision of new telecommunications infrastructure at roof level of Block B including shrouds, antennas and microwave link dishes (18 No. antennas enclosed in 9 No. shrouds and 6 No. transmission dishes, together with all associated equipment) if required. Telecommunications

infrastructure is also proposed in the adjoining Strategic Housing Development (SHD) application (pending decision ABP Reg. Ref. TA29N.312352) under the control of the Applicant. If that SHD application is granted and first implemented, no telecommunications infrastructure will be required under this application for LRD permission. If the SHD application is refused permission or not first implemented, the proposed telecommunications infrastructure in the LRD application will be constructed.

It is noted that the preferred location for the telecommunications infrastructure from a visual and functioning perspective is on the Phase 1 buildings. Operationally there is no requirement for this infrastructure in both phases and visually it could result in visual clutter.

4.17 Road Works

The following description of the road works onto Richmond Road has been provided by DBFL Consulting Engineers:

"The scheme also includes for enhancements of approx. 225m of the Richmond Road corridor comprising improved footways and the introduction of dedicated cycle infrastructure... The provision of dedicated high-quality pedestrian footways (1.8m to 2.0m wide) and cycle tracks (1.5m wide) will be provided as part of the Richmond Road upgrades proposed as part of the subject application. A signalised pedestrian crossing is proposed approx. 40m north-west of Block A.

It is noted that these upgrades were initially incorporated within the adjoining SHD development (ABP Pl. Ref. 312352) but has now been included within the subject application in order that these road upgrades are independent of the SHD development (i.e., will be delivered regardless of the SHD development planning application outcome)."

5.0 STATEMENT OF CONSISTENCY - NATIONAL POLICY

This section will demonstrate that the proposed development has been brought forward with due consideration of National Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against:

1. *Project Ireland 2040 – National Development Plan 2021-2030;*
2. *Project Ireland 2040 – The National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (December 2022);*
7. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*
8. *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009)*
9. *Design Manual for Urban Roads and Streets (2019);*
10. *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);*
11. *Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016.*

5.1 ***Project Ireland 2040 – The National Development Plan 2021-2030***

The *National Development Plan 2021 – 2030*, ("NDP") document was published in 2021 as an updated version of the previous *National Development Plan 2018 – 2027*.

As part of *Project Ireland 2040*, the *NDP* sets out the Government's over-arching investment strategy and budget for the period 2021-2030. It is an ambitious plan that balances the significant demand for public investment across all sectors and regions of Ireland with a major focus on improving the delivery of infrastructure projects to ensure speed of delivery and value for money.

The *NDP* sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in *Housing for All– a New Housing Plan for Ireland, September 2021* ("*Housing for All*") and will enable a step-change in investment to

ameliorate the effects of climate change. The *NDP* underpins the overarching message of the *National Planning Framework* ("NPF").

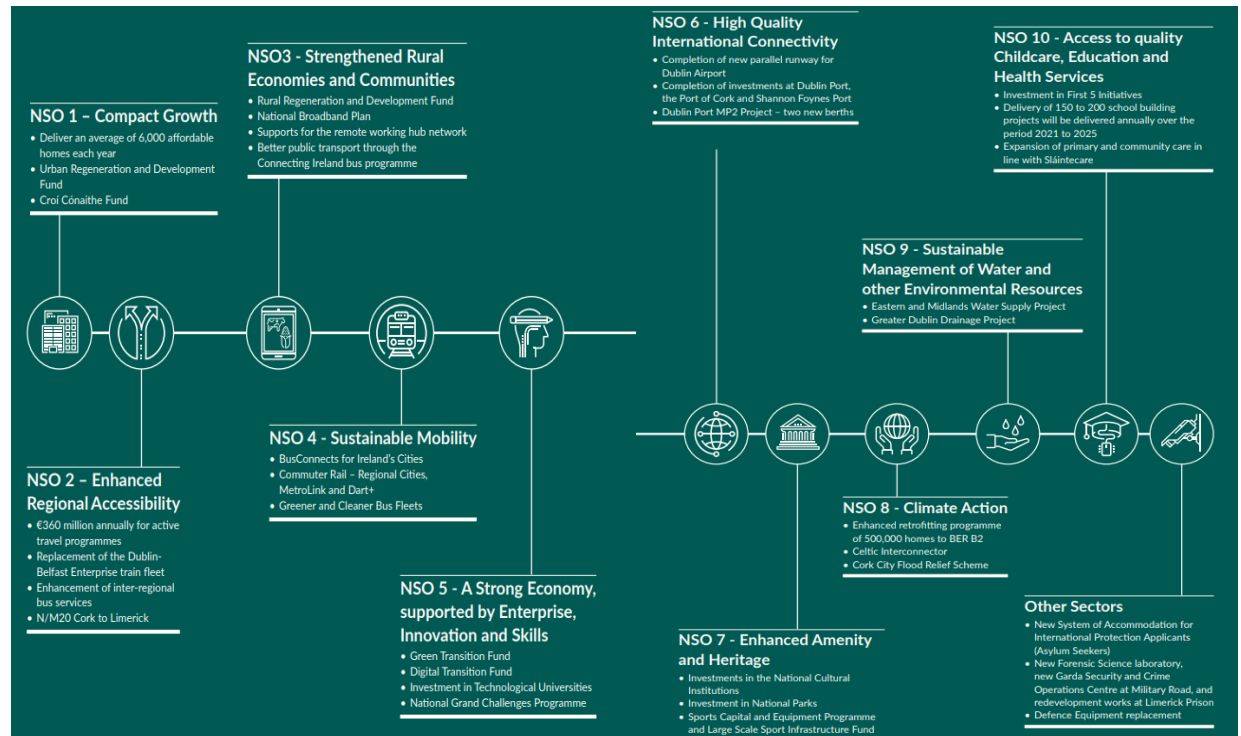


Figure 5.1: Major Investments – National Strategic Outcomes

(Source: *National Development Plan 2021-2030*)

The *NPF* has 10 No. National Strategic Outcomes, which are referenced in the *NDP*. The relevant strategic outcomes and objectives are discussed below at Section 5.2 of this report.

5.2 Project Ireland 2040: National Planning Framework

5.2.1 Introduction

Project Ireland 2040: National Planning Framework ("NPF") is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country.

The *NPF* is a long-term Framework that sets out how Ireland can move away from the current 'business as usual' pattern of development.

As set out in Section 6.6 of the *NPF*, a core principle of the *NPF* is to:

'Allow for choice in housing location, type, tenure and accommodation in responding to need', in addition to tailoring 'the scale and nature of future housing provision to the size and type of settlement where it is planned to be located'.

Therefore, we submit that the provision of 133 No. high-quality residential units, comprising a mix of 1 and 2 No. bedroom apartments units at the subject site will contribute to achieving this core principle of the *NPF*.

Section 6.6 of the *NPF* states that:

'while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (Census data), we are a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. In many European countries, it is normal to see 40%-60% of households living in apartments.'

The *NPF* further calculates at Section 6.6 that:

*'Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, **with increasing demand to cater for one and two-person households.**'* [Our Emphasis]

Furthermore, it is noted that *'achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010.'*

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the state consist of three people or less. In terms of changing family size, *'in Dublin city, one, two and three-person households comprise 80 percent of all households.'* It is also noted in a more general context that the *'household sizes in urban areas tend to be smaller than in suburbs or rural parts of the country'*. The policy document denotes that *'...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it'*. [Our Emphasis]

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the policy objectives as set out throughout this section, as it provides dwellings ranging in size from 1 No. to 2 No. bedroom units, in addition to artist studios, a retail unit, a creche and a gym, that will meet the needs of the future residents and the wider public.

Section 2.2 of the *NPF* sets out an overview of the *NPF* Strategy which includes reference to 'Compact Growth' as follows:

- *Targeting a greater proportion (40%) of future housing development to be **within and close to the existing 'footprint' of built-up areas.*** [Our Emphasis]
- ***Making 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'***. [Our Emphasis]

The *NPF* expressly seeks the densification of infill sites close to public transport and services and facilities such as the subject site. National Policy Objective 35 states that it is an objective to:

'Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.' [Our Emphasis]

The *NPF* also sets out the following regarding future growth needs in Section 6.6:

'Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Irelands cities.' [Our Emphasis]

The *NPF* recognises that building inwards and upwards is important to effectively address the housing crisis. Therefore, we consider that there is a significant importance placed in the *NPF* to develop high quality accommodation by increasing the density of developments in the Dublin.

In our professional planning opinion, the *NPF* supports the provision of the proposed mixed-use development through increased density and height at the subject site having regard to the design of the development which considers existing residential amenity, its proximity to public transport and local amenities, retail and commercial services and facilities and the express requirement of national policy to increase densities.

5.2.2 National Strategic Outcomes and Objectives

Section 10.3 of the *NPF* identifies a list of 10 No. National Strategic Outcomes which sets out the vision of the *NPF* (to create a shared set of goals for every community across the country) as follows:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. Sustainable Mobility;
5. A strong Economy supported by Enterprise, Innovation and Skills;
6. High Quality International Connectivity;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Water, Waste and other Environmental Resources; and
10. Access to Quality Childcare, Education and Health Services.

A number of key National Policy Objectives ("NPOs") have been identified throughout the *NPF* in order to successfully deliver the 10 No. Strategic Outcomes.

National Policy Objective 74 states that proposals should *'secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.'*

The table below sets out how the proposed development will contribute towards achieving the 10 No. National Strategic Outcomes identified in the *NPF* as follows:

Consistency with National Strategic Outcomes			
No.	Objective?	How it is Addressed by this development?	Meet criteria?
1:	Compact Growth;	Sustainable and efficient redevelopment of a key underutilised, brownfield site in an existing urban area.	Yes
2:	Enhanced Regional Accessibility;	Proximity to Drumcondra Train Station (c. 1.3 km /c. 17 minutes walking distance), frequent bus services run along the Drumcondra Road Lower Quality Bus Corridor (c. 800 metres/c. 10 minutes walking distance).	Yes
3:	Strengthened Rural Economies and Communities;	N/A – Urban Area	N/A
4:	Sustainable Mobility;	Promoting active and sustainable transport due to proximity of high-quality public transport, provision of bicycle parking spaces including 2 No. cargo bike parking spaces, and an additional 10 No. electric scooter spaces are provided. A reduced provision of car parking has been provided to promote sustainable modes of transport (0.18 spaces per unit + 1 No. space for the creche) and 13 No. electric vehicle parking spaces are provided in addition to a car share space.	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	Dublin City Centre is easily accessible from the subject site and therefore the proposed development is in close proximity to significant Employers/Higher Education Institutions such as Dublin City University, providing access to much sought-after residential accommodation for employees/students. The retail units and artists studios will also contribute towards strengthening the local economy and the regeneration of the surrounding area, especially as the artists who will occupy the studios had to vacate a nearby premises and the Applicant has engaged with them to provide new studios at the subject site.	Yes
6:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
7:	Enhanced Amenity and Heritage;	The scheme provides a high level of amenity space for future residents with the provision of external communal open space (1,480 sq m) and 606 sq m of public open space. The residents and public will have also have access to the extensive public open space proposed on the Phase 1 lands.	Yes

8:	Transition to a Low Carbon and Climate Resilient Society;	<p>The proposed development, by virtue of the strong public transport links and short bicycle journey time to many areas around the City, will encourage the use of sustainable modes of transport. The provision of bicycle parking spaces, electric scooter storage, electric vehicle parking spaces will also promote sustainable modes of transport.</p> <p>Green Roofs and SUDS infrastructure have been included within the design of the subject scheme to achieve a high energy rating and compliance with building standards.</p>	Yes
9:	Sustainable Management of Water, Waste and other Environmental Resources; and	Sustainable modes of transport encouraged, and sustainable management of water use and waste output, as detailed in accompanying reports.	Yes
10:	Access to Quality Childcare, Education, and Health Services;	The subject site is located a short distance from Drumcondra District Centre and within easy reach of Dublin City Centre via public transport, walking or cycling. There are therefore a wide range of Childcare, Education, Hospitals and Healthcare facilities within a short distance from the subject site as set out in the Social Infrastructure Audit prepared by Thornton O'Connor Town Planning.	Yes

A number of key national policy objectives are outlined in the *NPF* in order to successfully achieve the 10 No. Strategic Outcomes outlined above.

We have carried out an assessment of the NPOs identified in the *NPF* and have identified the relevant objectives that are applicable to the proposed development. The relevant NPOs that are applicable to the proposed development are discussed under the following headings:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design;
- Justification and Housing Need;
- Waste Environmental Issues; and
- Implementing the *National Planning Framework*.

5.2.3 Population Growth and Employment

The *NPF* sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the 5 No. main cities. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **National Policy Objective 1b** projects that the population of the Eastern and Midland Region will increase by 490,000 – 540,000 additional people.
- **National Policy Objective 1c** projects an additional 320,000 No. people in employment in the Eastern and Midland Region.
- **National Policy Objective 2a** – A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.
- **National Policy Objective 3a** – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- **National Policy Objective 3b** – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- **National Policy Objective 4** - Ensure the creation of attractive liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- **National Policy Objective 5** – Develop cities, towns and villages of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.
- **National Policy Objective 8** – Aims to ensure the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets. The targeted population growth for Dublin (city and suburbs) is a 20-25% increase from 1.173,000 No. (2016) to 1,408,000 No. (2040).
- **National Policy Objective 11** – In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

The development will facilitate the projected growth in population and persons in employment in the Eastern and Midland Region as identified in NPO 1b and 1c. A core principle of the *NPF* set out in Section 6.6 states that proposals should:

'Prioritise the location of new housing provision in existing settlements as a means to maximizing a better quality of life for people through accessing services; ensuring a more efficient use of land and allowing for greater integration of existing infrastructure.' [Our Emphasis]

Section 2.5 of the *NPF* outlines that compact development is the preferred approach which would focus on:

*'Reusing **previously developed, 'brownfield' land**, building up infill sites, which may not have been built on before and either **reusing or redeveloping existing sites and buildings**.'* [Our Emphasis]

The proposed development is located on brownfield infill land in a core urban location that is built-up, well served by public transport and is within easy cycling distance of the city centre.

As such the proposed development is consistent with NPOs 2a, 3a and 3b which aim to provide 50% of future population and employment growth within the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints. The *NPF* recognises that to achieve the targets set out in NPOs 3a and 3b of the framework which relate to the delivery of new homes, housing outputs will undoubtedly necessitate a significant increase of apartment type developments. NPO 8 requires targeted population growth for Dublin city and suburbs and the proposed development will contribute towards increasing the population of this area of Dublin.

Furthermore, it is noted in Section 6.6 that *'achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010.'*

The site is strategically located in close proximity to public transport which provides access to a number of employment locations, services and facilities and is within walking distance of Drumcondra District Centre.

The open spaces are high quality, attractive and liveable spaces where the residents will have the opportunity to interact with each other ensuring an integrated community within the scheme. Therefore, it is considered that the proposal will contribute to creating well designed and high-quality urban place as set out in NPO 4 and will ensure the site is sustainably developed contributing towards achieving NPO 5 which aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The proposed scheme involves the redevelopment of an underutilised, infill site in an existing built-up area and therefore is fully in accordance with the preferred approach of the *NPF*. The development will encourage social interaction between the residents of the scheme particularly by providing high-quality attractive public and communal spaces, creating a strong sense of community. The provision of artists studios, a retail unit, a creche and a gym, is also a significant planning gain for the wider area. The proposed development is consistent with the NPOs set out within this Section.

5.2.4 Current Trends in Tenure and Household Formation in Ireland

The *NPF* acknowledges at Section 4.5 that Ireland's housing crisis has resulted in:

'A time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained'.

The following NPOs respond to the changing nature of household formation and trends in tenure in current planning discourse.

- **National Policy Objective 6** – Regeneration and rejuvenate cities, towns and villages of all types of 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.
- **National Policy Objective 11** – outlines that 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.
- **National Policy Objective 32** – Details the target of delivering 550,000 No. additional households to 2040.

In accordance with NPOs 6,11 and 32, the development will rejuvenate this site, opening up the site for the public to utilise while also providing much needed housing for the area, which will encourage more people to live in the existing urban footprint whilst also contributing towards generating more jobs and activity within the existing urban area and will contribute towards the target of delivering 550,000 No. additional households to 2040.

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the State consist of three people or less. In terms of changing family size, *'in Dublin city, one, two and three-person households comprise 80 percent of all households.'* The document denotes that *'...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it.'* [Our Emphasis]

The proposed development provides 133 No. residential units which will positively contribute towards addressing the deficit in housing supply within Dublin. The development offers high quality accommodation at a time when the *NPF* acknowledges the constrained urban housing market. The scheme represents sustainable development as the site is situated in an existing residential and mixed-use area and the future residents of the scheme will benefit from the site's close proximity to public transport, employment, services and facilities. The provision of a retail unit, a creche, a gym and artists' studios will also benefit the residents and the surrounding area.

5.2.5 Sustainable Modes of Transport

The *NPF* sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be the most applicable to the proposed mixed-use development at the subject site.

- **National Policy Objective 26** – Outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with Planning Policy.
- **National Policy Objective 27** – Aims to ensure the integration of safe and convenient alternatives to the car into the design of our communities by

prioritising walking and cycling accessibility to both the existing and proposed developments and integrating physical activity facilities for all ages.

The subject site is well served by public transport within c. 1.3 km / 17 No. minutes walking distance from the Drumcondra Rail Station and c. 800 metres / c. 10 No. minutes walking distance from a Quality Bus Corridor running along Drumcondra Road Lower.

The proximity of the subject site to the city centre, which is easily accessible by foot, by bicycle and by public transport, will encourage future residents of the subject scheme to avail of more sustainable modes of transport.

The proposed development provides for 25 No. car parking spaces on site (24 No. for the residential element and 1 No. for the creche), providing a ratio of 0.18 No. spaces per residential unit. The parking spaces includes 3 No. car share spaces, 2 No. mobility impaired spaces and 13 No. electric vehicle parking spaces. Some 2 No. loading bays are also provided (1 No. internal to the site and 1 No. at the edge of Richmond Road). The scheme includes 424 No. bicycle parking spaces including 2 No. cargo bicycle parking spaces and an additional 10 No. electric scooter spaces. The proposal actively encourages the use of sustainable modes of transport such as public transport through the discouragement of car ownership. The development also includes attractive open spaces, which will encourage occupants to engage in regular physical activity.

The proposed development is consistent with NPOs 26 and 27 as set out above.

5.2.6 Scale, Massing and Design

The *NPF* sets out a number of planning policy objectives that specifically relate to the Scale, Massing and Design of developments. The following objectives are considered to be most applicable to the mixed-use development at the subject site.

- **National Policy Objective 13** outlines that to achieve well-designed high-quality outcomes performance-based standards will be put in place such as building height and car parking.
- **National Policy Objective 33** states residential development at appropriate scales within sustainable locations will be prioritised.
- **National Policy Objective 35** outlines the requirement to '*increase residential density in settlements, though a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*'

The proposed scheme has been subject to a high-quality standard of design, siting and layout, at an appropriate scale within the surrounding context of the Richmond Road area and represents the appropriate densification of this key underutilised site, contributing positively to the regeneration of the surrounding area. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a significantly scaled, strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*.

The Landscape and Visual Impact Assessment demonstrates that no significant material impacts will occur as a result of the proposed development. In relation to Daylight/Sunlight Assessment, it is expected that some impacts will occur in a regeneration area where higher density development is placed beside low-scale, low density development. However, the scheme has been designed in tandem with daylight/sunlight results to ensure a balance is achieved between seeking to provide increased density as required by national policy and the protection of existing amenity. For example, the layout of the development has been thoroughly considered and greater heights are positioned away from nearby residential dwellings with the height increasing as the site moves away from Richmond Road and in this regard, as detailed daylight studies were prepared, a storey was taken off Block A to protect surrounding residential amenity. The subject development will provide much needed animation to the street level along Richmond Road, with the inclusion of artist studios and retail units at ground floor level, replacing unsightly industrial units with the highest quality contemporary architecture.

In line with NPO 13, the *Development Plan, Apartment Guidelines, 2022*, the *Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)*, the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)* and the *Urban Design Manual – A Best Practice Guide (2009)*, set out the specific standards for residential developments, as discussed in this report. The proposed development is also appropriate in terms of scale, mass and height in responding to NPO 33, providing an increase in height and density within an existing settlement, whilst still respecting the context in which it is being provided, which is therefore in accordance with NPO 35.

5.2.7 Waste and Environmental Issues

The *NPF* sets out a number of planning policy objectives that specifically relate to Waste and Environmental issues. The following objectives are considered to be most applicable to the proposed development of this planning application:

- **National Policy Objective 52** sets out the planning systems must respond to the environmental challenges and have regard to relevant environmental legislation.
- **National Policy Objective 53** is concerned with supporting greater land efficiency and use of renewable resources by reducing the rate of urban sprawl and new development.
- **National Policy Objective 54** aims to reduce the carbon footprint by integrating climate action into the planning system.
- **National Policy Objective 56** sets out the intentions to sustainably manage waste generation.
- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 63** aims to ensure that efficient and sustainable management and conservation of water resources and water services infrastructure.

- **National Policy Objective 64** aims to improve air quality through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport.
- **National Policy Objective 65** supports the aims of the Environmental Noise Regulations.
- **National Policy Objective 75** stipulates that *'all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate'*.

The subject site is a key underutilised site ideally located for residential and commercial development given its proximity to Dublin city centre, key employment generators and the level of public transport service available and thus the redevelopment of these underutilised lands is in accordance with the waste and environmental policies outlined above.

The proposed scheme has had regard to relevant environmental legislation as set out in the enclosed reports in accordance with NPO 52. The development will support the efficient use of core urban land and will contribute towards reducing the rate of urban sprawl in accordance with NPO 53.

The redevelopment of the subject site will provide a population in close proximity to public transport and encourage walking and cycling, in accordance with NPO 54 and NPO 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. The proposed development will positively contribute to the surrounding area as it will enhance permeability and wider connectivity for the wider area and will contribute to the green infrastructure network (NPO 58).

The proposed scheme provides 25 No. car parking spaces (including 13 No. electric vehicle spaces and 2 No. mobility impaired spaces) and 424 No. bicycle parking spaces (including 2 No. cargo bicycle parking spaces and an additional 10 No. electric scooter spaces). By providing a reduced level of car parking provision, the subject scheme seeks to encourage future residents to either walk or cycle to the city centre and all of the amenities contained therein or avail of the high-quality public transport in close proximity to the subject site. Therefore, the reduced provision of car parking for the subject scheme will contribute to consolidated growth and the reduction in carbon emissions. The proposed scheme will promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with NPO 54.

The proposed development is supported by the following reports which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues, particularly in accordance with NPO 63, 65 and 75:

- Landscape Planning Report by Mitchell + Associates Landscape Architecture;
- Environmental Impact Assessment Screening Report prepared by Enviroguide Consulting;
- Ecological Impact Assessment Report prepared by Enviroguide Consulting;
- Appropriate Assessment Screening Report prepared by Enviroguide Consulting;
- Traffic and Transportation Assessment Report prepared by DBFL Consulting Engineers;

- Infrastructure Design Report prepared by DBFL Consulting Engineers;
- Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers;
- Arboricultural Report and Drawings by The Tree File;
- Noise Assessment by AWN Consulting;
- Preliminary Construction Environment Management Plan by DBFL Consulting Engineers;
- Resource and Waste Management Plan by AWN Consulting; and
- Operational Waste Management Report prepared by AWN Consulting.

It is considered that the proposed development is consistent with the waste and environmental objectives as set out in the *NPF*.

5.3 **Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)**

The *Action Plan for Housing and Homelessness – Rebuilding Ireland* recognises that a significant increase in new homes is needed and is referenced in the long title to the *Planning and Development (Residential Tenancies) act 2016, as amended*. The Action Plan outlines a 5 No. pillar approach;

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 2 and Pillar 3.

- Pillar 2: Increase the level and speed of delivery of social housing and other state-supported housing.
- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.

The publication outlines that the affordability of property in the current economic climate is the basis for the decline in home ownership. As a result, there is a growing number of households paying a greater proportion of their incomes on accommodation which has subsequent impacts on their quality of life and their ability to save.

The publication stipulates in relation to the delivery of housing that:

‘the housing challenge is not simply about providing more homes – it is also about moving away from cycles of volatility in supply and affordability. Ireland needs to move towards a more stable, cost effective, affordable housing provision model that also delivers the right level of housing, in the right places and at the right time.’

The subject scheme proposes the development of an underutilised site on Richmond Road. The proposed development will contribute towards addressing the national housing crisis through the provision of 133 No. dwelling units, including 27 No. Part V units. The development will directly address the evident housing need by significantly increasing housing accommodation in this highly attractive and sought-after location and responds proportionately to the pillars as set out above, with particular emphasis on Pillars 2 and 3. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The proposed development will provide additional housing options including some 27 No. social housing units, which represents 20% of the proposed units in accordance with Part V of the *Planning and Development Act 2000 (as amended)*.

The development is consistent with the policy guidance as set out within the *Action Plan for Housing and Homelessness, Rebuilding Ireland (2016)*.

5.4 ***Housing for All– a New Housing Plan for Ireland, September 2021 ("Housing for All")***

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

The overall objective of *Housing for All* is that:

'Every citizen 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.'

Section 3 of *Housing for All* states:

'An average of 33,000 homes must be provided every year between now and 2030.'

The policy has 4 No. pathways to achieving *Housing for All*:

- Supporting Home Ownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock

The pathways contain actions to be taken to achieve the objectives outlined above.

The subject scheme providing 133 No. residential units in an ideal location on Richmond Road, proximate to public transport, employment locations, services and facilities and will contribute towards achieving the objectives of *Housing for All*, by providing housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 27 No. Part V units (20%). Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All*.

5.5 ***Urban Development and Building- Heights Guidelines for Planning Authorities (December, 2018)***

The *Urban Development and Building Heights Guidelines for Planning Authorities* (“*Building Height Guidelines*”) were adopted in December 2018 under Section 28 of the 2000 Act. An Bord Pleanála and Planning Authorities must have regard to these Guidelines and, in particular, compliance with the Specific Planning Policy Requirements (SPPRs) is mandatory (see Section 9(3)(b) of the SHD Act).

The *Building Height Guidelines* state that a key objective of the *NPF* is to significantly increase the building heights and overall density of developments. The Minister's foreword to the *Building Height Guidelines* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas which is an unsustainable model. There is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards.

The *Building Height Guidelines* state that the:

*‘Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, **by building up and consolidating the development of our existing urban areas.**’* [Our Emphasis]

The *Building Height Guidelines* further note that:

*‘A key objective of the *NPF* is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.’* [Our Emphasis]

The *Building Height Guidelines* also emphasise that increasing prevailing building heights have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and it notes that the planning process must actively address how this objective will be secured.

The *Building Height Guidelines* expressly seek increased building heights in urban locations:

*‘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.’* [Our Emphasis].

The *Building Height Guidelines* also advise that taller buildings can assist in contributing to a sense of place and can indicate important street junctions:

*'Furthermore, while **taller buildings** will bring much needed additional housing and economic development to well-located urban areas, they **can also assist in reinforcing and contributing to a sense of place** within a city or town centre, such as indicating the **main centres of activity**, important street junctions, public spaces and transport interchanges. In this manner, **increased building height is a key factor in assisting modern placemaking** and improving the overall quality of our urban environments'.*
[Our Emphasis]

The layout of the proposed development has comprehensively considered the position of the proposed blocks and units, and sought to provide a development that both adheres to national policy discourse, whilst also respecting the scale of character of its receiving environment. For example, the development provides the greater heights towards the centre of the site, with lower heights fronting Richmond Road, opposite lower density dwellings. The 9 No. storey block (Block C) is located at a prominent location as the road turns on Richmond Road. The 10 No. storey block (Block B) matches the height of the proposed Phase 1 development and will provide views towards the River Tolka. By providing a lower shoulder height onto Richmond Road, the block is stepped back from lower density dwellings opposite on Richmond Road, with the building stepping up in height towards the rear of the site. The block is also appropriate in the context of the Distillery Building (Protected Structure) and other Protected Structures in the vicinity, as confirmed in the *Architectural Heritage Impact Assessment* prepared by Historic Building Consultants which states:

"the proposed development would have little or no adverse impact on the character of any of the protected structures in the vicinity. It would also result in an improvement in the character of the site itself adjacent to the conservation area, in that it would replace a series of commercial buildings and an open yard that could be seen as conflicting with the conservation area objective."

Block A is lower in height (up to 4 No. storeys) which ensures that the height transitions across the site from the Phase 1 development and provides adequate daylight and sunlight, both to the Phase 1 development and the lower-scaled dwellings opposite on Richmond Road. The scheme is laid out in 3 No. linear blocks with the narrower northern gables fronting onto Richmond Road. This will ensure that the scheme is broken up and allows the development to breathe. The layout and orientation break up the massing of the development as viewed from the surrounding area including the existing houses opposite on Richmond Road. Therefore, it is considered that the scheme as proposed is the optimal solution for the lands.

It is further considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a significantly scaled, strategically positioned and underutilised plot is maximised.

A *Landscape and Visual Impact Assessment* and *Daylight and Sunlight Assessment* have been carried out in conjunction with the design of the subject development. These assessments demonstrate that the proposed layout and design will not have an undue negative impact on its receiving environment and thus can be assimilated into the surrounding environment. We note that some impact in terms of daylight/sunlight can be expected

when densifying sustainable sites, especially proximate to lower density developments. However, the scheme has been designed in conjunction with daylight/sunlight analysis to ensure a balance has been achieved between densifying the subject sustainable site and protecting residential amenity.

It is our professional planning opinion that the site has the capacity and capability to accommodate increased height that is actively sought in National policy guidance, particularly given the strategic location of the subject site in proximity to public transport, employment locations and services and facilities.

Chapter 3 of the *Building Height Guidelines* expressly seeks increased building heights in urban locations:

*'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.'* [Our Emphasis]

Under the heading 'Development Management Principles', the *Building Height Guidelines* state (at paragraph 3.1) that it is Government policy that building heights must generally be increased, and that Planning Authorities must apply certain broad principles when considering development proposals for buildings taller than prevailing building heights in pursuit of the *Building Height Guidelines*.

There is no doubt that the Specific Planning Policy Requirements in the *Building Height Guidelines* are relevant to the assessment of this proposed development.

Section 3.1 of the *Building Height Guidelines* states that 'Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines':

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

The proposed scheme involves the development of an underutilised, brownfield, infill site, in a core, urban location. The subject development will contribute towards delivering compact growth in Dublin City. The scheme is therefore fully in accordance with the preferred approach of the *NPF* which seeks compact growth.

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?

In our professional opinion, the *Development Plan* should be read in conjunction with the *Building Height Guidelines* and in this regard, we note that the recently adopted *Development Plan* allows flexibility in relation to building heights in line with the *Building Height Guidelines*.

It is considered that the heights proposed principally ranging from part 1 No. storeys to part 10 No. storeys are appropriate at the subject lands especially having regard to the site's frontage onto Richmond Road and the overall modulation of the scheme, in order to accord with Government policy to increase building heights in sustainable locations. The variation in proposed heights across the site provides visual interest and is appropriate in this location in order to accord with Government policy to increase building heights in sustainable locations.

A Daylight and Sunlight Assessment and Landscape and Visual Impact Assessment have been carried out in conjunction with this application.

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

The *Development Plan* allows a locational based assessment of height to be carried out in relation to building height, which is more flexible than the prescriptive heights of the previous Development Plan.

We note in particular National Policy Objective 35 of the *National Planning Framework*, which seeks an increase in residential density in settlements, through a range of measures including the provision of infill development schemes, area or site-based regeneration and increased building heights.

It is our opinion that the subject site has the potential for increased heights to sustainably densify this strategic site having regard to the high-quality architectural composition of the scheme, the open spaces provided and the site's location with prominent frontage onto Richmond Road, which will all contribute towards absorbing the proposed building heights.

A Landscape and Visual Impact Assessment and Daylight and Sunlight Assessment have been carried out in conjunction with the design of the subject development, which highlight that the subject site has the potential to absorb the proposed greater heights. Some impacts are expected in terms of daylight/sunlight due to the express requirement in national policy to densify prime urban sites.

Specific Planning Policy Requirement 3

SPPR₃ of the Building Height Guidelines sets out that:

'It is a specific planning policy requirement that where;

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria [below]; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

*then the planning authority **may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.**' [Our Emphasis]*

Section 9(3) of the SHD Act provides as follows:

'(3) (a) When making its decision in relation to an application under this section, the Board shall apply, where relevant, specific planning policy requirements of guidelines issued by the Minister under section 28 of the Act of 2000.

(b) Where specific planning policy requirements of guidelines referred to in paragraph (a) differ from the provisions of the development plan of a planning authority, then those requirements shall, to the extent that they so differ, apply instead of the provisions of the development plan.' [Our Emphasis]

We now wish to detail how the proposed development complies with the specified criteria under Section 3.2 of the *Building Height Guidelines*, which are referred to in SPPR₃ as follows:

Development Management Criteria	
At the Scale of the Relevant City/ Town	
Assessment Criteria	Comment
<ul style="list-style-type: none"> The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. 	<ul style="list-style-type: none"> The subject site is considered eminently suitable for the proposed development given the availability of sustainable modes of transport such as Drumcondra Railway Station (c. 1.3 km / c. 17 minutes walking distance) and bus stops on Drumcondra Road (c. 800 metres / c. 10 minutes walking distance). The site is also linked with other modes of public transport. For example, bus route No. 1 provides a connection to the LUAS at Abbey Street. A Mobility Management Plan prepared by DBFL Consulting Engineers and enclosed with this planning application provides further detail in relation to the existing and proposed high-quality public transport facilities serving the subject site. The development proposes a reduced car parking provision including 3 No. car share spaces, which will reduce the need for residents to own a private car. The scheme also proposes a large quantum of bicycle parking (in excess of requirements) including cargo bicycle parking, and electric scooter storage is also proposed, which will promote sustainable development.

	<ul style="list-style-type: none"> • A study on the capacity of public transport in the area has been prepared by DBFL Consulting Engineers and is enclosed in the Traffic and Transport Assessment.
<ul style="list-style-type: none"> • <i>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 landscape and visual assessment (LVIA), by a suitably qualified practitioner such as a chartered landscape architect.</i> 	<ul style="list-style-type: none"> • It is our professional opinion that the proposed scheme will successfully assimilate into the surrounding context, regenerating the subject site through the replacement of underutilised industrial units, with much needed higher density residential units, which will contribute positively towards addressing the national housing crisis and will also provide services for the residents and wider public (retail, artist studios, creche and gym). This development has been designed to tie-in with the adjoining SHD scheme if granted permission by the Board, with both schemes designed by the same Team. These two developments in tandem will start to see the regeneration of these Z10 zoned lands. • The subject scheme includes the provision of public open spaces and the new development will activate the streetscape which represents a significant improvement to the existing public realm and is therefore a significant planning gain for the surrounding area and community. • The subject scheme will result in the appropriate densification of a key infill brownfield site providing much needed residential units which will contribute towards addressing the national housing crisis. • We note that the subject site is located near the River Tolka, a large water body, and links into Phase 1 of the development. When considering the two sites together, it is our opinion that there is capacity to absorb increased height. It is considered that the proposed development takes the opportunity to enhance the neighbouring Conservation

	<p>Area (Tolka River) due to the high-quality design that will be provided by RKD Architects. The proposed scheme will complement the Conservation Area and will have a positive impact on the character of the area, starting its transition from a low-lying industrial nature to the provision of higher density contemporary developments in line with national policy discourse in this inner suburban location. In relation to the Distillery Protected Structures, Historic Building Consultants note <i>“given the scale of the buildings at Distillery Lofts the proposed development would have minimal impact on their setting. The principal views of the former distillery are from Distillery Road and on the approach via a private roadway from Richmond Road, and in neither of these views would the proposed development intrude, being to the western side of that approach from the north”</i>.</p> <ul style="list-style-type: none"> • A <i>Landscape Visual Impact Assessment</i> prepared by Mitchell + Associates demonstrates that there will be no adverse visual impacts as a result of the proposed development. CGIs prepared by 3D Design Bureau are included, which demonstrate the high-quality design of the proposed scheme. Views towards the site will also be significantly improved, removing the existing unsightly industrial nature of the site, and replacing it with a high-quality development. A Daylight and Sunlight Analysis has been carried out by 3D Design Bureau, and the scheme has been designed in tandem with daylight/sunlight results to ensure that a balance is achieved between the need to provide higher density development and protected residential amenity.
<ul style="list-style-type: none"> • <i>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</i> 	<ul style="list-style-type: none"> • The proposed scheme will make a positive contribution to the surrounding area by developing a key underutilised site and providing a high-quality development which will contribute positively towards addressing the national housing crisis. In addition, artist

<p><i>respond to the scale of adjoining developments and create visual interest in the streetscape.</i></p>	<p>studios, a creche, a gym and retail floor space will be provided fronting Richmond Road which will enliven and animate the streetscape and create visual interest along the road and thus will positively contribute to place-making.</p> <ul style="list-style-type: none"> • RKD Architects have prepared an <i>Architectural & Urban Design Report</i> which details the variety of heights & massing proposed. • The subject scheme allows for the future extension of Richmond Road, which will allow new streets to be incorporated. • The open spaces will enhance the quality of living of future occupants and the wider public and thus will positively contribute to place-making.
---	---

Development Management Criteria	
At the scale of District/ Neighbourhood / Street	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i> 	<ul style="list-style-type: none"> • The high-quality design and strategic layout of the proposed development will allow the development to be readily absorbed into the surrounding area and will make a positive contribution to the urban neighbourhood and streetscape. • The layout also allows high-quality public and communal open space to be provided. The high-quality materials utilised in the scheme, the provision of open spaces and pedestrian pathways and the provision of artist studios, retail space, a creche and a gym fronting Richmond Road, will also ensure that the development will make a positive contribution to the streetscape. The development has regard to clear guidance provided in National Planning Policy which seeks the densification of brownfield sites in sustainable locations such as the subject site. • The development will respond to its natural environment by contributing to

	<p>the green infrastructure of the City and by providing areas of public and communal open spaces, which will enhance the natural environment and demonstrates that the natural and built environment have been comprehensively considered. This proposed development will enhance legibility for the area and will create a vibrant sense of place.</p> <ul style="list-style-type: none"> • The <i>Architectural & Urban Design Report</i> by RKD Architects notes the following in relation to height: <p><i>"Additional building heights are proposed to the back of the site, away from Richmond Road and the lower height existing context. These additional heights relate to the Phase 1 proposal. The massing is broken down to not overbear on the protected structure in the adjacent site."</i></p> • We submit that the proposal will respond well to its overall built environment and will complement the Phase 1 development. • The proximity of the site to the Conservation Area and Protected Structures has also been duly considered as part of the design process of the subject scheme. The high-quality scheme provided, which will principally replace the existing unsightly industrial unit, will enhance the surrounding environment and thus will have a positive impact on the surrounding Conservation Area and Protected Structures. There are no Protected Structures, Recorded Monuments or Places, or Architectural Conservation Areas pertaining to the subject site. We note that the Conservation Department did not raise any concerns with the scheme at pre-planning stage. • The high-quality design of the proposed development will allow the development to be integrated into the
--	--

	surrounding area and as noted above, will positively enhance the legibility and streetscape of the surrounding area.
<ul style="list-style-type: none"> <i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</i> 	<ul style="list-style-type: none"> The <i>Architectural & Urban Design Report</i> by RKD Architects outlines the materiality of the subject development. The scheme has been designed to ensure interesting and relieved facades which reduce the perceived mass and scale of the block. The height varies across the site, which demonstrates that the development has been broken down to ensure that the scheme will not represent a monolithic form. The development is presented as 3 No. linear blocks with narrow gables fronting onto Richmond Road. The 3 No. blocks are provided on a north-south axis allowing this narrow arrangement to be presented onto the streetscape, which breaks down the proposed massing and allows the development to breathe. This block arrangement also allows extensive opportunities for views into and out of the site and avoids a monolithic wall of new building along Richmond Road. The building form and massing are broken down into smaller entities with the provision of setbacks and the modulation of heights. For example, Block A will be 4 No. storeys in height which will provide an appropriate transition from the proposed 6 No. storey element in Phase 1 fronting onto Richmond Road. The façade has been considered in detail to deliver an overall visual variety but with façade modules designed with detail, colour and textural variety. Furthermore, the high-quality open spaces provide visual relief throughout the scheme. It is clear that a significant effort has been made to provide a well-considered and interesting building form which enhances legibility, wayfinding and

	connectivity within the site for future residents and the existing wider area.
<ul style="list-style-type: none"> <i>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)".</i> 	<ul style="list-style-type: none"> The subject scheme will enhance the public realm, particularly due to the active frontage provided onto Richmond Road and the public and communal open spaces provided, with the open spaces shared with the Phase 1 development which provides a new Greenway along the River Tolka. The scheme represents a planning gain for the wider neighbourhood and legibility and permeability will be enhanced. The <i>Site Specific Flood Risk Assessment</i> prepared by DBFL Consulting Engineers and enclosed with this application concludes that: <ul style="list-style-type: none"> <i>"As per the OPW Guidelines, the sequential approach has been applied, the proposed development has passed the necessary justification tests, the development does not increase flood risk elsewhere and the development's design incorporates measures to address flood risk."</i>
<ul style="list-style-type: none"> <i>The proposal makes a positive contribution to the improvements of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i> 	<ul style="list-style-type: none"> The subject scheme seeks to limit urban sprawl by making best use of an existing brownfield site. The proposed scheme will make a positive contribution to the surrounding area by densifying a key underutilised site and providing a high-quality residential development which will contribute positively towards addressing the national housing crisis. The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, appropriately densifying an underutilised brownfield site, creating a clear definition to the urban edge along the Richmond Road and providing a varied and visually interesting façade for the surrounding streetscape. The high-quality design of the scheme will ensure the development will be a

	<p>legible and attractive addition to the area especially due to the provision of public open spaces accessible from Richmond Road and the commercial units fronting onto Richmond Road, which will ensure the legibility, permeability and quality of the public realm in the vicinity of the subject site is enhanced. The scheme allows for connections between the Phase 1 and Phase 2 communal open space for the residents of both schemes. The public spaces will be easily accessible from Richmond Road and the connection between communal open space will be for the future residents only.</p>
<ul style="list-style-type: none"> <i>The proposal positively contributes to the mix of uses and/ or building / dwelling typologies available in the neighbourhood.</i> 	<ul style="list-style-type: none"> The <i>Dublin City Development Plan 2022-2028</i> recognises the need to provide appropriately sized households. Policy SC12 stipulates that a variety of adaptable housing types must be provided as follows: <p><i>"It is the policy of Dublin City Council... 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."</i></p> <ul style="list-style-type: none"> Furthermore, the <i>NPF</i> states that: <p><i>"the 2016 Census indicates that if the number of 1-2-person dwellings is compared to the number of 1-2-person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2- person households as there are 1-2 person homes."</i></p> Therefore, it is clear that the mix of 1 and 2 No. bed apartments proposed are required in order to provide an appropriate mix of dwelling typologies in the area, as recognised in the <i>Development Plan</i> and the <i>NPF</i>. The

	<p>recently adopted <i>Development Plan</i> does not specify a required housing mix for the subject site (dwelling mix requirements are set out for the North Inner City and the Liberties limiting the number of studios and one bedroom units to 30% and requiring a minimum of 15% of units to be three bedroom units).</p> <ul style="list-style-type: none"> The community and commercial element of the scheme fronting Richmond Road will provide an active frontage and enhance the streetscape. In addition, the creation of public open space will enhance the amenity of the overall site for the community and the provision of communal internal and external amenities will provide a high quality living environment for future residents.
--	--

Development Management Criteria	
At the Scale of the Site/ Building	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i> 	<ul style="list-style-type: none"> The Design Team have comprehensively considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the residential and mixed-use surrounding context, albeit it changes the site from a low-scaled industrial use to a mixed-use urban quarter. This has been achieved by modulating heights throughout the site with the lower block for example stepping down to the dwellings on Richmond Road as well as allowing adequate daylight into the proposed Phase 1 development. The provision of narrow linear blocks and open spaces has also enabled the careful modulation of the development at the subject site. The design of the subject scheme has evolved through a creative process, in conjunction with the results of the <i>Daylight and Sunlight Assessment Report</i> to ensure an attractive living

	environment for future residents which has a limited impact on the amenity of surrounding properties.
<ul style="list-style-type: none"> • <i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and an effective urban design and streetscape solution.</i> 	<ul style="list-style-type: none"> • As noted previously, the scheme has evolved in tandem with the <i>Daylight and Sunlight Assessment Report</i>. Please see conclusion below from the report by 3D Design Bureau: <p><i>"This impact study has considered two different scenarios: the impact of Phase 2 on its own and secondly, the impact of the cumulative state (Phases 1 and 2). Furthermore, an additional impact assessment has been carried out to quantify the effect Phase 2 would have on the windows of Phase 1 and on the proposed amenity areas of Phase 1 also.</i></p> <p><i>Whilst the results for VSC for Phase 2 only could be considered acceptable, the cumulative impact to the surrounding properties is greater. However it is to be expected given the density targeted for the overall masterplan of the site and encouragingly, very little impact to the sunlight of existing windows would happen in this cumulative state. The impact to the Sun on Ground (SOG) of surrounding properties can be considered acceptable as the front gardens impacted are mostly used as private car park spaces.</i></p> <p><i>The impact of Phase 2 on Phase 1 can also be considered acceptable. The architects worked closely with 3DDB to minimise the impact on Phase 2, which has improved since the pre-application stage after design mitigation.</i></p> <p><i>The scheme performance assessment for this report has quantified the level of daylight (SDA) and sunlight (SE and SOG) within the proposed development. As per the impact</i></p>

	<p>assessment, this study was carried out in two different scenarios:</p> <p>The surrounding context in its existing state (Phase 1 excluded) and secondly in the cumulative state (surrounding context including Phase 1 Reg. Ref. TA29N.312352).</p> <p>In both scenarios, the scheme performance has yielded very positive results for the daylight (SDA), with compliance rates ranging from ~94% to ~98%.</p> <p>The Sunlight Exposure (SE) assessment has also provided favourable results in both assessments with compliance rates ranging from ~78% to ~86%.</p> <p>The proposed amenity areas have also been assessed for SOG under the two different states (Phase 2 only and cumulative). For Phase 2 only, the SOG would be ~92% compliant, whilst in the cumulative state, 4 no. of areas would not meet the recommendations for sunlighting on March 21st. However, as seen in the hourly shadow diagrams on section F.o on page 135, these areas would receive sunlight between approximately 11am and 3pm during summer-time. Furthermore all occupants will have access to a number of open amenity spaces throughout the development.</p> <p>In conclusion, whilst there will be a level of impact to surrounding properties, this needs to be considered having regard to wider planning and housing policies and the masterplan of this site along with what the proposed scheme will bring to the area when compared to what is currently on site.</p> <p>Finally, for future occupants of the scheme they can expect to enjoy good</p>
--	---

	<p><i>levels of daylight and sunlight within the proposed development."</i></p> <p>We note that Section 5.3 of the Daylight and Sunlight Assessment Report by 3D Design Bureau sets out the compensatory design measures for the scheme in relation to the units that could be considered to fully adhere the guidance. These measures include large apartment sizes, dual aspect provision and large private terraces.</p>
--	---

Development Management Criteria	
Site Specific Assessments	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measurements 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.</i> 	<ul style="list-style-type: none"> • A Microclimate Assessment has been prepared by AWN Consulting and is enclosed separately. The Assessment clearly demonstrates that there will be no adverse impacts on the existing microclimate as a result of the proposed development.
<ul style="list-style-type: none"> • <i>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.</i> 	<ul style="list-style-type: none"> • All appropriate ecological and environmental reports have been prepared and are submitted with this planning application (i.e. the Natura Impact Statement). • The scheme has considered the potential interaction of the building location, materials and artificial lighting to potentially impact on flight lines and/or collisions.
<ul style="list-style-type: none"> • <i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i> 	<ul style="list-style-type: none"> • A Telecommunications Report has been prepared for the subject scheme by Independent Site Management (ISM), which concludes the following: <p><i>"The proposal being made by the Applicant within its submission to An Bord Pleanála allows for the retention of important Telecommunication Channels, such as Microwave links, to satisfy the criteria of</i></p>

	<i>Section 3.2 of the Building Height Guidelines (2018)."</i>
<ul style="list-style-type: none"> <i>An assessment that the proposal maintains safe air navigation.</i> 	<ul style="list-style-type: none"> The subject site is not located in proximity to any aerodromes. Having regard to the location of the proposed development and the proposed height, no specific Aviation Assessment is considered necessary.
<ul style="list-style-type: none"> <i>An urban design statement including, as appropriate, impact on the historic built environment.</i> 	<ul style="list-style-type: none"> An <i>Architectural & Urban Design Report</i> has been prepared by RKD and is enclosed separately. It is considered that the proposed development takes the opportunity to enhance the proximate Conservation Area and Protected Structures in the vicinity, by replacing the existing underutilised structures on site with a high-quality development. This application is also accompanied by an <i>Architectural Heritage Impact Assessment</i> prepared by Historic Building Consultants which concludes that: <p><i>"The proposed development would have little or no adverse impact on the character of any of the protected structures in the vicinity. It would also result in an improvement in the character of the site itself adjacent to the conservation area, in that it would replace a series of commercial buildings and an open yard that could be seen as conflicting with the conservation area objective."</i></p>
<ul style="list-style-type: none"> <i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i> 	<ul style="list-style-type: none"> An <i>AA Screening Report</i>, a <i>Natura Impact Statement</i>, an <i>Environmental Impact Assessment Screening Report</i>, an <i>Ecological Impact Assessment</i> and <i>Article 103 Statement</i> prepared by Enviroguide Consulting are enclosed with this planning application.

Conclusion on compliance with criteria under Section 3.2 of the *Building Height Guidelines*

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines*. The application proposes a mixed-use development principally ranging from part 1 No. storeys to part 10 No. storeys. The development can be appropriately assimilated within the surrounding context having regard to the location of the subject site within an existing built-up area with large frontage onto Richmond Road. The site is well served by public transport and in proximity to employment locations, services and facilities.

It is our professional planning opinion that the subject site is capable of achieving additional height and density having regard to the policies of the *NPF* and the *Building Height Guidelines* which encourages increased height and density on appropriate sites. It is considered that the design response ensures that the development potential of a strategically positioned underutilised plot is maximised without impacting adversely on the amenity of adjacent properties and the surrounding area. For example, the lower shoulder height of Block B onto Richmond Road (opposite lower density dwellings) transitions to greater heights towards the rear of the site, demonstrating that the scheme has been comprehensively considered and will appropriately assimilate into its surrounding context.

5.6 *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2022)*

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments* in December 2022 (*"Apartment Guidelines, 2022"*).

The purpose of the *Apartment Guidelines, 2022* published in December 2022 as an update to the *Apartment Guidelines* published in March 2018 (*"Apartment Guidelines, 2018"*) and previously updated in December 2020 (*"Apartment Guidelines, 2020"*) (principal changes relate to Shared Living and Build-to-Rent policies), is to reiterate ministerial guidance, setting out standards for apartment developments, mainly in response to circumstances that had arisen whereby some local authority standards were at odds with national guidance. The *Apartment Guidelines, 2022, 2020 and 2018* build on the content of the *Apartment Guidelines* published in 2015 (*"Apartment Guidelines, 2015"*) particularly in relation to design quality safeguards such as internal space standards for 1, 2 and 3 No. bedroom apartments, floor to ceiling height, internal storage and amenity space.

The *Apartment Guidelines, 2022, 2020 and 2018* update previous guidance 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 and projected need for additional housing supply. The Government's *Rebuilding Ireland – Action Plan for Homelessness, 2016* (*"Rebuilding Ireland"*), the *National Planning Framework – Ireland 2040* (*"NPF"*) and *Housing for All – a New Housing Plan for Ireland, September 2021* (*"Housing for All"*) have both been published since the *Apartment Guidelines, 2015*. We note that the *Development Plan* should be read in conjunction with the *Apartment Guidelines, 2022*. The Specific Planning Policy Requirements of the *Apartment Guidelines, 2022* take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

It is considered that the subject site is located within a 'Intermediate Urban Location' as set out in the *Apartment Guidelines, 2022*, which states:

'Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:

- *Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services*

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

As noted in the *Apartment Guidelines, 2022*, 'the range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors'. The subject site is located on Richmond Road, c. 1.3 km from Drumcondra Railway Station and within a short distance from a number of significant employment locations including, but not limited to, St Vincent's General Hospital (c. 400 metres) and DCU St. Patrick's Campus (c. 800 metres). There are bus stops on the N1 Drumcondra Road Lower within c. 800 metres / c. 10 minutes walking distance which serve the following bus routes (peak frequency): Nos. 1 (every 10-12 mins), 11 (every 15-20 mins), 13 (every 12-15 mins), 16 (every 10-12 mins), 41 (every 20 mins) and 44 (every 60 mins) for example.

We note that although there is no bus service within 5 minutes or 400-500 metres walking distance, the site is appropriately located close to Drumcondra, employment locations, Drumcondra Train Station within c. 1.3km /c. 17 minutes walking distance and frequent bus services along the Drumcondra Road Lower Quality Bus Corridor within c. 800 metres/c. 10 minutes walking distance.

Based on the above outlined criteria, in our professional planning opinion the subject site can therefore be considered an Intermediate Urban Location.

In terms of meeting future housing need, the *Apartment Guidelines, 2022* set out at Section 2.6 that:

'demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2- person, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type'.

Furthermore, the 2016 Census indicates that:

'if the number of 1-2-person dwellings is compared to the number of 1-2-person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2- person households as there are 1-2- person homes.'

The *Apartment Guidelines, 2022* recognises the need for alternative types of accommodation to facilitate the societal and economic changes that have affected household formation and housing demand.

The proposed development includes 133 No. apartments comprising 65 No. one bedroom units and 68 No. two bedroom units and will therefore provide suitable alternative housing accommodation types for people seeking residential accommodation in Dublin. In addition, it is highlighted that the development will provide 27 No. social housing units (20% of the total units), which is in accordance with Part V of the *Planning and Development Act 2000* (as amended).

Specific Planning Policy Requirement 1

In relation to the unit mix of Apartment Developments, Specific Planning Policy Requirement 1 of the *Apartment Guidelines, 2022* states that:

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

The subject scheme comprises 133 No. units comprising 65 No. one bedroom units (49%) and 68 No. two bedroom units (51%), in accordance with SPPR 1.

Specific Planning Policy Requirement 3

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

All apartments meet, and in many cases, exceed the minimum apartment floor areas set out in SPPR3. Please refer to the Housing Quality Assessment Table prepared by RKD Architects. Furthermore, as the scheme is Build-to-Sell, we note that more than 50% of the units will exceed minimum standards by 10%.

Specific Planning Policy Requirement 4

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

- (i) *A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) ***In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.***
- (iii) *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.'* [Our Emphasis]

The development proposes 70% of the units (93 No.) as dual aspect. This exceeds the requirements of SPPR 4 of the *Apartment Guidelines, 2022*, which demonstrates the high-quality design of the subject scheme.

Specific Planning Policy Requirement 5

'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.'

Floor to ceiling heights throughout will exceed 2.4 metres clear internally. Typical floors achieve a 2.65 metre high internal floor to ceiling height. There are no residential units at ground floor level. The ground floor commercial units will have a floor-to-floor height of 4 metres to ensure adequate space for mixed uses and to allow future adaption of the spaces if required.

The proposal is therefore fully in compliance with SPPR5 of the *Apartment Guidelines, 2022*.

Specific Planning Policy Requirement 6

'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 0.25ha.'

The number of units per core in the subject scheme are as follows:

Block A (Single Core)

Max: 6 No. apartments

Min: 4 No. apartments

Block B (Single Core)

Max: 8 No. apartments

Min: 6 No. apartments

Block C (2 Cores)

Max: 9 No. apartments

Min: 5 No. apartments

Therefore, the scheme does not exceed the 12 No. units per core outlined under SPPR6.

Minimum Aggregate Area of Living/Dining/Kitchen Area and Minimum Widths for Main Living/Dining Rooms

The *Apartment Guidelines, 2022* outline a requirement for minimum aggregate area of living/dining/kitchen space as follows:

Unit Type	Minimum Living/Kitchen/Dining Area Required	Width of Living/Dining Room Required
Studio	30 sq m	4 metres
One Bedroom	23 sq m	3.3 metres
Two Bedroom (3 No. person)	28 sq m	3.6 metres
Two Bedroom (4 No. person)	30 sq m	3.6 metres
Three Bedroom	34 sq m	3.8 metres

Each of the units within the proposed development have been designed in accordance with the standards for the minimum aggregate area of the living/dining/kitchen space and widths of the living/dining room outlined in the *Apartment Guidelines, 2022*.

Minimum Bedroom Floor Areas/Widths

The *Apartment Guidelines, 2022* outline the requirement for minimum bedroom floor areas and widths as follows:

Unit Type	Minimum Floor Area	Minimum Width
Studio	30 sq m	4 metres
Single Bedroom	7.1 sq m	2.1 metres
Double Bedroom	11.4 sq m	2.8 metres
Twin Bedroom	13 sq m	2.8 metres

Each of the units have been designed in accordance with the standards for the minimum bedroom floor areas and widths outlined in the *Apartment Guidelines, 2022*.

Minimum Aggregate Bedroom Floor Areas

The *Apartment Guidelines, 2022* outline the requirement for minimum aggregate bedroom floor areas as follows:

Unit Type	Minimum Aggregate Floor Area
One Bedroom	11.4 sq m
Two Bedroom (3 No. person)	13 + 7.1 sq m = 20.1 sq m
Two Bedroom (4 No. person)	11.4 + 13 sq m = 24.4 sq m
Three Bedroom	11.4 + 13 + 7.1 sq m = 31.5 sq m

Each of the units have been designed in accordance with the standards for the minimum aggregate bedroom floor areas outlined in the *Apartment Guidelines, 2022*.

Minimum Storage Space Requirements

The *Apartment Guidelines, 2022* outline the requirement for minimum storage space as follows:

Unit Type	Minimum Storage Space
Studio	3 sq m
One Bedroom	3 sq m
Two Bedroom (3 No. person)	5 sq m
Two Bedroom (4 No. person)	6 sq m
Three Bedrooms or more	9 sq m

As detailed in the Housing Quality Assessment enclosed, each of the units have been designed in accordance with the standards for the minimum storage space outlined in the *Apartment Guidelines, 2022*.

Private Open Space

The *Apartment Guidelines, 2022* outline a requirement for private open space per unit as follows:

Unit Type	Private Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. person)	6 sq m
Two Bedroom (4 No. person)	7 sq m
Three Bedroom	9 sq m

Private open space has been provided for each of the proposed apartments in line with the requirements outlined in the *Apartment Guidelines, 2022*.

Communal Open Space

The *Apartment Guidelines, 2022* outline the following standards for communal open space:

Unit Type	Communal Open Space Standard	No. of Units Proposed	Communal Open Space Requirement
1-bed	5 sq m	65	325 sq m
2-bed (3-person)	6 sq m	9	54 sq m
2-bed (4-person)	7 sq m	59	413 sq m
Total		132	792 sq m

Based on the composition of the proposed 133 No. apartments, the subject scheme has a requirement of 792 sq m of communal open space to meet the minimum standards outlined in the *Apartment Guidelines, 2022*.

The subject scheme includes 1,480 sq m of outdoor high-quality landscaped communal open space designed by Mitchell + & Associates, which significantly exceeds the minimum requirement.

5.7 ***Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)***

The *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)* outline a number of key principles which are of relevance to the subject scheme:

"The purpose of these Guidelines is to assist in achieving the objectives of Delivering Homes; Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by:

- Promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
- Encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;*
- Pointing the way to cost effective options for housing design that go beyond minimum codes and standards; promoting higher standards of environmental performance and durability in housing construction;*
- Seeking to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and providing homes and communities that may be easily managed and maintained."*

The subject scheme provides a high-quality designed scheme in accordance with required standards. The scheme makes optimal use of the lands and has taken the opportunity to explore the potential for an increase in heights in appropriate locations throughout the site.

The scheme will be provided with high quality materials that are reflective of the surrounding context, as described throughout the *Architectural + Urban Design Statement*:

"Richmond Road, and the surrounding areas of Fairview and Drumcondra have a rich built heritage, mostly made up of brick and stone of a variety of colours, textures and scale. The material choice for the proposed development has been inspired by this heritage. A variety of high quality materials are used. The ground floor of all the proposed blocks, which contain the commercial and community uses, are stone, inspired by the surrounding former industrial buildings. The residential buildings above are finished in bricks of various colours which compliment the surrounding Georgian and Victorian architecture. Stone details in contrasting colours are inspired by the detailed brickwork of the surrounding architecture."

Block B, the tallest building in the proposed development is clad in a distinctive dark buff stone, marking this landmark building out as unique while complimenting the brick buildings around."

The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The scheme will provide attractive and high-quality apartments, open spaces, community floorspace and commercial floorspace, which ensures that first-rate living conditions will be developed. In addition, the design of the subject scheme has evolved through a creative process, in conjunction with the results of the *Daylight and Sunlight Assessment* to ensure an attractive living environment for future residents. The safety and security guidance outlined in the 2007 Guidelines have also been taken into consideration in the design of the scheme.

5.8 ***Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009)***

The aim of *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)* ("*Sustainable Residential Development Guidelines 2009*") is to set out the key planning principles which should be reflected in development plans and local area plans, and which should guide the preparation and assessment of planning applications for residential development in urban areas. The document sets out high level aims that:

"Need to be translated into specific planning / design policy and objectives which can be applied at different scales of residential development, ranging from districts or neighbourhoods within large urban centres, to expansion of smaller towns and villages, and finally down to the level of the individual home and its setting."

There are 10 No. high-level aims set out in the document, which are set out and responded to below:

- 1) Prioritise walking, cycling and public transport, and minimise the need to use cars;

The scheme promotes sustainable modes of transport by providing a low car parking ratio and encouraging public transport, walking and cycling.

- 2) Deliver a quality-of-life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;

The development will provide high-quality units with large areas of public and communal open spaces and residents' amenity space. The scheme provides 70% dual aspect units.

The development promotes safety and facilitates the natural surveillance of adjoining routes and spaces as all open spaces are overlooked by apartments and/or artists space or commercial floorspace. The site is located in proximity to public transport, employment, services and facilities, and is thus an ideal and convenient location for residential development.

- 3) Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;

A 'Social Infrastructure Audit' has been prepared by Thornton O'Connor Town Planning and is enclosed as a separate document. This Audit demonstrates that there is sufficient existing provision of social infrastructure in the vicinity of the site to accommodate the proposed development. A creche is provided in the development as there were some minor capacity issues identified in the area. In addition, the retail, gym and artist studios will also enhance service provision in the community.

- 4) Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;

A detailed Architectural & Urban Design Statement has been submitted with this planning application detailing that high-quality materials have been proposed for the subject scheme. The materials proposed represents the industrial character of the site and its surrounding area. The development is designed to ensure that the long-term durability and maintenance of materials is an integral part of the design and specifications of the proposed development. The development will provide public open space improvements to the public realm and will enliven the streetscape onto Richmond Road, which will ensure that the scheme will enhance this area and will create a vibrant sense of place and will make a positive contribution to the urban neighbourhood, streetscape and public realm.

- 5) Are easy to access for all and to find one's way around;

Community floorspace, commercial floorspace and external open spaces are provided throughout the surface level of the scheme. These spaces will be easy to navigate and will enhance permeability for the wider area and will enliven the streetscape onto Richmond Road (which is currently a blank and oppressive facade). Access to the residential cores will also be easy to navigate.

- 6) Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;

The proposed development represents the sustainable and efficient development of underutilised, brownfield land in a core urban location, proximate to public transport, employment, services and facilities. *A Climate Action and Energy Statement incorporating*

Part L for Planning Compliance Report has been prepared by Axiseng Consulting Engineers and is enclosed with this application, which notes that:

"the development complies with the Part L and NZEB requirements and is achieving an A2 BER...The overall results show that the units are performing & exceeding the requirements to meet Part L and NZEB compliance. The combination of efficient plant & high performing envelope details ensures thermal comfort for occupants and minimal energy use."

- 7) Provide a mix of land uses to minimise transport demand;

The development principally provides residential units in addition to public and communal open spaces, and artist studios, retail, a gym, a creche. The development is a low car usage development and promotes sustainable modes of transport, especially due to the site's location proximate to public transport and close to a huge range of services and amenities. The scheme also provides walking and cycling from the site, with several connections provided throughout the site and 424 No. bicycle parking spaces and 2 No. cargo bicycle parking spaces and 10 No. electric scooter spaces are proposed. Therefore, the development encourages sustainable modes of transport which will minimise car usage.

- 8) Promote social integration and provide accommodation for a diverse range of household types and age groups;

The development promotes social integration with the range of public and communal open spaces provided and the community and commercial spaces proposed. The mix of 1 and 2 No. bedroom units will add diversity to the existing unit provision in the area. Some 27 No. Part V units are provided in accordance with Part V of the *Planning and Development Act 2000 (as amended)*, which requires 20% social and affordable housing.

- 9) Enhance and protect the green infrastructure and biodiversity; and

The development will enhance and contribute to the green infrastructure and biodiversity of Dublin City. The scheme will provide good quality tree planting and hedging on the site and will act as a green infrastructural link towards other green infrastructure networks in the City along the Greenway.

- 10) Enhance and protect the built and natural heritage

The proposed scheme will enhance the natural and built heritage of the site, due the high quality design proposed, in addition to the provision of public and communal open spaces. The site will enhance the visual amenity of the area and will be a positive insertion to the area having regard to the current unsightly warehouse unit present on site, which represents a significant underutilisation of scarce urban land.

The *Urban Design Manual – A Best Practice Guide (2009)* is a companion document to the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)*.

The Urban Design Manual sets out 12 No. key indicators for developments in urban areas:

1) Context – How does the development respond to its surroundings?

The proposed development has been subject to a high-quality design by RKD Architects.

In our opinion, the heights provided in the subject development are appropriate having regard to the expressed requirement in National level policy to achieve compact growth, in addition to the careful modulation of height throughout the site, which responds to the situational context. The height of the subject scheme modulates throughout the site in the form of 3 No. linear blocks provided in a north-south direction sitting 90 degrees to Richmond Road. This will provide the majority of the units with easterly and westerly aspects. The provision of these slender blocks with the gable end fronting onto Richmond Road will break down the massing of the development, which will provide extensive opportunities for views into and out of the site whilst allowing the development to breathe.

Block A is lower in height (up to 4 No. storeys) which ensures that the height transitions across the site from the Phase 1 development, with a pop-up 9 and 10 No. storey elements provided in Blocks B and C. The greater heights are proposed away from residential dwellings opposite on Richmond Road, with the height increasing as the site moves away from the street. In addition, the height is modulated throughout the site and a variety of materials are utilised, which provides varied and interesting facades.

The Design Team have comprehensively considered the scheme layout and modulation in order to ensure that the development improves legibility in the area and will integrate into the surrounding context.

2) Connections – How well connected is the new neighbourhood?

The subject site is located within walking and cycling distance of many employment locations, services and facilities in addition to being well served by public transport. The scheme also provides a connection through to the Phase 1 site for residents with further access to the future Greenway proposed under Phase 1 along the River Tolka. This will also ensure the new neighbourhood is well connected.

As previously noted, the application site is located approximately c. 1.3 km from Drumcondra Railway Station and within a short distance from a number of significant employment locations including, but not limited to, St Vincent's General Hospital (c. 400 metres) and DCU St. Patrick's Campus (c. 800 metres). There are bus stops on the N1 Drumcondra Road Lower within c. 800 metres / c. 10 minutes walking distance from the subject site which serve the following bus routes (peak frequency): Nos. 1 (every 10-12 mins), 11 (every 15-20 mins), 13 (every 12-15 mins), 16 (every 10-12 mins), 41 (every 20 mins) and 44 (every 60 mins) for example.

We note that although there is no bus service within 5 minutes or 400-500 metres walking distance, that the site is appropriately located close to Drumcondra, employment locations, Drumcondra Train Station is within c 1.3 km /c. 17 minutes walking distance and the Drumcondra Quality Bus Corridor is within c. 800 metres/c. 10 minutes walking distance. It is evident that the site is well connected and sustainable modes of transport are encouraged within the proposed scheme.

3) Inclusivity – How easily can people use and access the development?

As previously noted, the proposed development has been designed to encourage sustainable modes of transport e.g. walking, cycling and public transport. For example, the scheme includes bicycle parking, cargo bicycle parking and electric scooter parking.

We note that significant efforts have been made to ensure accessible routes have been provided throughout the scheme, with level access provided to the proposed building and with the facilitation of public open space and commercial and community activity along Richmond Road, significantly enhancing the connectivity between the subject scheme and the public realm and the usability of the site by the wider community.

4) Variety – How does the development promote a good mix of activities?

The development provides 133 No. residential units comprised of 65 No. one bedroom units and 68 No. two bedroom units. We note the residential development is supported by the provision of a gym in addition to artist studios, retail floorspace and a creche. In addition to the internal amenity spaces there is also 1,480 sq m of communal open space and 606 sq m of public open space.

The proposed scheme has been designed ensuring that a wide variety of amenities and facilities are available for future residents to utilise within the development. We note that the area surrounding the subject site contains a wide variety of services, facilities and amenities which are all within walking and cycling distance of the subject site, especially within Drumcondra District Centre.

5) Efficiency – How does the development make appropriate use of resources, including land?

National policy expressly seeks the densification of underutilised lands such as the subject site. The 0.55 Ha developable site is located in close proximity to public transport and employment locations. The proposed scheme will provide a density of 242 No. units per hectare. We note that the provision of 1 and 2 No. bedroom units within the subject scheme disproportionately inflates the density figure. The proposed plot ratio of 2.65, which is perhaps a more accurate representation of the proposal, clearly represents efficient densification of core urban lands.

The proposed development is consistent with the zoning as set out in the *Dublin City Development Plan 2022-2028*, which includes residential, creche, retail and gym as a permissible use. The proposed development represents the appropriate densification of this underutilised site while having regard to the need to protect the amenity of surrounding properties. The proposed scheme provides for high quality and valuable landscaped areas which will provide amenity and biodiversity.

6) Distinctiveness – How do the proposals create a sense of place?

The scheme provides public and communal open spaces, which will allow the public and/or residents to enjoy high-quality landscaped outdoor spaces, which will create a sense of place. The commercial and community floorspaces will also active the streetscape along Richmond Road which will improve the relationship of the site with the surrounding area and will allow the residents and wider community to integrate.

7) Layout – How does the proposal create people friendly streets and spaces?

There will be limited vehicular activity within the subject scheme which provides a public realm that prioritises ease of movement for pedestrians and bikes (vehicular movements limited to the eastern boundary of the site which terminates at the rear of the site).

The public and communal open spaces will be landscaped at a human scale. The improved public realm will be an attractive addition to the area. The communal open spaces for the residents which will be an attractive environment to enjoy. In addition, the development includes proposed upgrades to Richmond Road including a new cycle path/track and widened footpaths. Therefore, the proposal creates people friendly streets and spaces.

8) Public Realm – How safe, secure and enjoyable are the public areas?

The outdoor spaces will be subject to a high level of passive surveillance as they will be overlooked by the residential units / commercial / community spaces, ensuring that these areas are safe and secure. The communal open space will include a children's play area for any young families to enjoy.

The proposed development includes a comprehensive Landscape Plan and Landscape Planning Report prepared by Mitchell + Associates Landscape Architects, a copy of which is enclosed with this planning application, and which sets out the strategy for the provision of safe, secure and enjoyable public spaces.

9) Adaptability – How will the buildings cope with change?

The ground floor level of the development allows for minimum floor to floor heights of 4 metres which are capable of internal modification and adaption where deemed necessary as per SPPR 5 of the *Apartment Guidelines, 2022*.

It was noted during the Pre-Planning Consultation and in the neighbouring pending SHD Application that historically commercial units have struggled along Richmond Road. As such, the commercial units have been designed to be in such a way that it could potentially be adapted to provide an internal resident amenity use/residential accommodation if it transpires that the unit is not commercially viable for example (and would be subject to a future planning application). However, the Applicant has sought to ensure viable uses through the specific provision of a gym and a creche as part of the commercial offering.

10) Privacy and Amenity – How does the scheme provide a decent standard of amenity?

The contemporary design provides for versatile private units. Each of the 133 No. residential units within the subject scheme have been provided with private open space in the form of balconies or terraces in compliance with the provisions of the *Apartment Guidelines, 2022*.

The *Dublin City Development Plan 2022-2028* requires 10% of the total site area as public open space on the subject lands. The subject scheme includes the provision of 606 sq m of public open space, which equates to 11% of the developable site.

Furthermore, according to the *Apartment Guidelines 2022*, the subject scheme results in a requirement of 792 sq m of communal amenity space to meet the minimum standards

outlined in the *Apartment Guidelines 2022*. The subject scheme includes 1,480 sq m of external communal amenity space. Therefore, the communal open space provision significantly exceeds the requirement.

It is clear that the proposed scheme provides for a high-quality residential development in accordance with minimum standards.

11) Parking – How will the parking be secure and attractive?

The scheme proposes 25 No. car parking spaces providing a ratio of 0.19 No. spaces per unit. The scheme includes 2 No. mobility impaired spaces, which equates to 8% of the total parking provision, 3 No. car share spaces, 13 No. electric vehicle parking spaces and an additional 1 No. drop off space along Richmond Road.

Sustainable modes of transport such as cycling and walking are promoted within the scheme, with the provision of 424 No. bicycle parking spaces in addition to 2 No. cargo bicycle parking spaces and 10 No. electric scooter spaces.

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

A detailed Architectural Design Statement prepared by RKD Architects and Landscape Planning Report by Mitchell + Associates Landscape Architecture are submitted as part of this planning application, which sets out the design rationale of the proposed development providing a high-quality innovative scheme.

The assessment of the proposed development above and in the context of the expert reports referred to demonstrates that the proposal is consistent with the guidance as set out in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)* and the *Urban Design Manual – A Best Practice Guide (2009)*.

5.9 *Design Manual for Urban Roads and Streets (2019)*

The *Design Manual for Urban Roads and Streets (DMURS)* sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

5.9.1 Policy Background

The *Design Manual for Urban Roads and Streets* references the *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document which was published by the Department of Transport. The key goals as set out within the *Smarter Travel* document include:

- (i) To reduce overall travel demand;
- (ii) To maximise the efficiency of the transport network;

- (iii) To reduce reliance on fossil fuels;
- (iv) To reduce transport emissions; and
- (v) To improve accessibility to public transport.

Given the intermediate urban location of the application site c. 1.3 km from Drumcondra Railway Station, c. 800 metres/ c. 10 No. minutes walking distance from bus stops on Drumcondra Road and within a short distance from a number of significant employment locations including, but not limited to, St Vincent's General Hospital (c. 400 metres / c. 5 minutes walking distance) and DCU St. Patrick's Campus (c. 800 metres / c. 10 minutes walking distance), it is anticipated that residents of the scheme would largely rely on walking, cycling or utilising existing public transport routes to reach their place of work.

In the context of the sites accessibility to high-quality public transport, car parking is limited to 25 No. spaces within the proposed development (including 2 No. accessible spaces). The scheme is considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009 – 2020*.

5.9.2 Site Layout and Legibility

As noted previously, the proposed development promotes permeability and legibility through the site by providing public open space which have been designed to increase the legibility and permeability. Car parking is provided at basement level which is accessed from an entrance that connects to the Richmond Road.

The proposed high-quality designed layout of the scheme by RKD Architects will ensure that the scheme will be legible in the streetscape while also sitting comfortably within its immediate context. We note that the development has been designed in accordance with DMURS, as demonstrated in the enclosed DMURS Statement prepared by DBFL Consulting Engineers.

5.9.3 Sustainable Transport

Drumcondra Train Station is c. 1.3 km (c. 17 minute walking distance) from the site and there are bus stops on the N1 Drumcondra Road Lower within c. 800 metres / c. 10 minutes walking distance which serve the following bus routes (peak frequency): Nos. 1 (every 10-12 mins), 11 (every 15-20 mins), 13 (every 12-15 mins), 16 (every 10-12 mins), 41 (every 20 mins) and 44 (every 60 mins) for example.

The DMURS publication references that the Smart Travel document includes a "*vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips*".

The proposed scheme provides 424 No. bicycle parking spaces in addition to 2 No. cargo bicycle parking spaces and 10 No. electric scooter parking spaces, ensuring that sustainable modes of transport are encouraged.

As established in the above commentary, it has been demonstrated that the proposed mixed-use scheme is consistent with the guidance as per the *Design Manual for Urban Roads and Streets (2019)*.

The DMURS Design Statement prepared by DBFL Consulting Engineers states that *"it is the design teams view that the design presented for the proposed Large-scale Residential Development (LRD) has maximised every opportunity to ensure consistency with both the principles and design guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) (Version 1.1, 2019)"*.

This DMURS Design Statement sets out specific attributes of the scheme design which contribute to achieving this DMURS objective.

5.10 ***The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)***

The *Planning System and Flood Risk Management Guidelines (2009)* published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The Flood Risk Assessment prepared by DBFL Consulting Engineers concludes the following:

"It is concluded that as per the OPW Guidelines, the sequential approach has been applied, the proposed development has passed the necessary justification tests, the development does not increase flood risk elsewhere and the development's design incorporates measures to address flood risk"

Thus, the proposed development is acceptable having regard to the objectives of *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

5.11 ***Guidelines for Planning Authorities on Childcare Facilities (2001) and the Child Care Act 1991 (Early Years Services) Regulations 2016***

The *Guidelines for Planning Authorities on Childcare Facilities (2001)* ("Childcare Guidelines, 2001") sets outs that:

"Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities...In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate."

The *Childcare Guidelines, 2001* further state:

"The Planning and Development Act, 2000, makes it a mandatory requirement on planning authorities to include in their Development Plan objectives on the provision of services for the community, including creches and other childcare facilities."

The objectives of the *Childcare Guidelines, 2001* are to:

- Update and develop baseline data on the quality of existing and prospective childcare needs in association with the County Childcare Committees;
- Promote childcare facilities in the following locations as a key element in the provision of sustainable communities:
 - Residential areas;
 - Places of employment;
 - Educational establishments;
 - City and town centres, neighborhood and district centres;
 - Convenient to public transport nodes.
- Establish a system of monitoring the achievements of the above objectives.

The *Childcare Guidelines, 2001* identify appropriate locations for childcare facilities as identified below:

- New communities/Larger new housing developments - *'Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.'*
- The vicinity of concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working – *facilitating safe and efficient journeys to/from the workplace of parents/guardians.*
- In the vicinity of schools – facilitating parents dropping off school-going children and children attending childcare facilities on route to their place of employment;
- Neighbourhood, District and Town Centres – combating competitive pressure from larger commercial areas.

- Adjacent to public transport corridors, park and ride facilities, pedestrian routes and dedicated cycle ways.

The *Childcare Guidelines, 2001* stipulate that Planning Authorities should require one childcare facility (providing for a minimum 20 childcare places) per approximately 75 No. dwellings. However as noted above, a childcare facility does not need to be provided if there are significant reasons relating to the development consisting of single bed apartments or where adequate childcare facilities exist in adjoining developments. It is also noted that the *Apartment Guidelines, 2022* state the following:

'One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.'

The Childcare Demand Assessment prepared by Thornton O'Connor Town Planning enclosed separately concludes the following:

"Consultation with existing childcare facilities in and bordering the Study Area has indicated an available capacity in existing childcare facilities of 5 No. spaces.

The childcare planning permission pipelines within the Study Area will cumulatively create an additional childcare capacity of 175 No. childcare spaces.

Together with the anticipated demand arising from the proposed development, it is concluded that a requirement for 3-5 No. childcare spaces are expected, requiring a minimum childcare floor space of 13.3 sq.m.

While it is submitted that the limited number of childcare places to be accommodated from the subject development could most likely be absorbed by the existing facilities network, and the two planned facilities (comprising 175 No. childcare spaces), the childcare facility proposed as part of this development will add a further 156 sq m gross floor space (90.1 sq m of clear floor space) accommodating c. 35 children. This level of provision is above the likely demand generated by the future occupants of the proposed development, and will likely also serve the local area as the site is within walking distance of many residential units.

Thus, the proposed creche, which can accommodate c. 35 children, and the additional childcare capacity identified in the permitted scheme within the area, will serve the wider area's needs while offsetting the potential capacity deficit identified by this report for the Study Area."

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant National Policy Documents.

6.0 STATEMENT OF CONSISTENCY - REGIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* and *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031*.

6.1 *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*

The *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* ("RPGs") provides a long-term sustainable planning framework for the GDA. The RPGs is a policy document which aims to direct the future growth of the Greater Dublin Area over the medium to long term.

The RPGs set out that *'quality housing should be reflected equally in terms of the overall layout of the scheme and its urban design characteristics, the internal layout, form and design of housing and the external architectural form of housing which should relate to the wider urban area of which it is part while facilitating the creation of areas of distinct character.'*

In relation to Dublin, the RPGs states that:

'A core element of the RPGs is the importance of integration of land use, employment and transport. Within the City, as the national hub of employment and transport, it is critical that the policy of encouraging high quality new housing within the core of the gateway continues. The City, with a large young population inflated by students, migration and a young mobile workforce, has lower occupancy rates, particularly in the inner City which drives higher housing demand per head of new population. The importance of the detailed urban plans and guidelines in setting clearly the template for successful infill and regeneration development needs to continue, taking the long term perspective. New transport hubs at metro stations and along the interconnector route line give these locations high accessibility and mobility and this needs to be capitalised on where possible.'

The following Strategic Policies are considered relevant and have been assessed in respect of the proposed development:

Strategic Policy EP1 outlines the importance of the integration of climate change considerations into Development Plans, Flood Risk Assessments and Biodiversity and Heritage plans.

The proposed development has had due regard to climate change, flood risk and biodiversity.

An *Environmental Impact Assessment Screening Report* has been prepared by Enviroguide Consulting, in addition to a number of technical reports on specific environmental issues, such as the *Appropriate Assessment Screening Report* and *Ecological Impact Assessment* also prepared by Enviroguide Consulting, the *Site Specific Flood Risk Assessment* prepared by DBFL Consulting Engineers and the *Climate Action and Energy Statement incorporating Part L for Planning Compliance Report* prepared by Axiseng Consulting Engineers are included with this submission.

The enclosed technical reports demonstrate that the proposed development is consistent with Strategic Policy EP1.

Strategic Policy EP2 refers to the need to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long-distance commuting.

The proposed development will facilitate new employment opportunities for the local community in the form of staff for the operation and management of the residential units and the creche, gym, retail and artist studios within the subject scheme.

In addition, the availability of affordable, high quality and a range of tenures close to a number of significant employment nodes will allow employees to live closer to their place of work and reduce commuting distances and will allow new employers to have confidence that adequate residential development is available for their employees.

Therefore, the proposal is consistent with Strategic Policy EP2.

Strategic Policy SP1 stipulates that the delivery of new housing in the GDA shall support the NSS, Smarter Travel and the DoEHLG Guidelines on Sustainable Residential Development. The RPG Settlement Strategy encourages the focusing of new housing development on:

- (i) consolidation within existing built footprint with particular focus on the metropolitan area;
- (ii) supporting the achievement of sustainable towns;
- (iii) supporting national investment in public transport services by focusing new development areas to key locations to achieve the integration of land use and high quality public transport provision, and
- (i) build up economics of scale for services in identified growth towns.

The proposed scheme will positively address each of the criteria above where relevant.

The subject development will:

- Provide residential units within Dublin City, which represents its consolidation within the existing urban footprint;
- Represent the sustainable development of this accessible urban area; and
- Provide residential units in a key urban location proximate to public transport.

The subject lands are located in a sustainable location and will promote the increase in population at a location in proximity to public transport and employment locations.

The scheme is considered to be consistent with Strategic Policy SP1.

Strategic Policy PIP5 relates to waste management and aims to ensure environmental, business and public health needs are met. It also sets out to promote and facilitate reuse and recycling.

An *Operational Waste Management Plan* (OWMP) and *Resource Waste Management Plan* (RWMP) have been prepared by AWN Consulting and a *Preliminary Construction Environment Management Plan* (CEMP) has been prepared by DBFL Consulting Engineers and are included as part of this submission. These reports set out the waste management strategy for the subject site.

The proposal is therefore consistent with Strategic Policy PIP5.

Strategic Policy GIP1 is concerned with the protection of built heritage and protected species.

The subject site is not located within any statutory designated areas and is not comprised of any significant built heritage features, although the site is proximate to Protected Structures and a Conservation Area. The scheme will enhance the built heritage of the area as the proposed development takes the opportunity to enhance the Conservation Area on part of the site and Protected Structures in the vicinity, by replacing the existing underutilised structures on site with a high-quality development. The *Architectural Heritage Impact Assessment* prepared by Historic Building Consultants and enclosed separately notes the following:

"The proposed development would result in a more ordered site than the present commercial use and would be more compatible with the conservation area objective than the present commercial buildings and yard".

The *Appropriate Assessment Screening Report* containing information for the purposes of Stage 1 Screening for AA is presented in a separate document with this application and has been prepared by Enviroguide Consulting. This Report concludes:

"In conclusion, upon the examination, analysis, and evaluation of the relevant information, and in applying the precautionary principle; it is concluded by the authors of this report that, on the basis of objective information, the possibility may be excluded that the Proposed Development will have any significant effect on the European sites listed below:

- *Rockabill to Dalkey Island SAC [003000]*
- *Baldoye Bay SAC [000199]*
- *Ireland's Eye SAC [002193]*
- *Howth Head SAC [000202]*
- *Malahide Estuary SAC [000205]*
- *Wicklow Mountains SAC [002122]*
- *Glenasmole Valley SAC [001209]*
- *Dalkey Islands SPA [004172]*
- *Wicklow Mountains SPA [004040]*
- *Baldoye Bay SPA [004016]*
- *Howth Head Coast SPA [004113]*
- *Malahide Estuary SPA [004025]*
- *Ireland's Eye SPA [004117]*

However, upon examination of the relevant information including in particular the nature of the potential impact pathways associated with the Proposed

Development, the possibility cannot be excluded that the Proposed Development will have a likely significant effect on the European sites listed below:

- *South Dublin Bay SAC [000210]*
- *North Dublin Bay SAC [000206]*
- *South Dublin Bay and River Tolka Estuary SPA [004024]*
- *North Bull Island SPA [004006]*

As such, further assessment is required to establish whether any likely significant effects to the above four European sites may arise as a result of the Proposed Development. A NIS⁵ has been prepared and accompanies this application as a separate document.

The Natura Impact Statement prepared by Enviroguide Consulting concludes that:

"As a result of the complete, precise and definitive findings of this NIS; it has been concluded beyond any reasonable scientific doubt, that the Proposed Development will not have any significant adverse impact on the above European sites

The proposal is consistent with Strategic Policy GIP1.

Strategic Policy GIP2 aims to protect and conserve the natural environment, in particular EU designated sites.

As noted above in response to GIP1, a Natura Impact Statement has been prepared and accompanies this planning application as a separate document.

The proposal is therefore consistent with Strategic Policy GIP2.

Strategic Policy GIP6 sets out to ensure the protection, enhancement and maintenance of the natural environment with specific emphasis on the value of green spaces.

See response to Policy GIP1 and GIP2 above. The proposed scheme has been designed with due regard for the natural environment, the value of green space and the strategic green network. Outdoor public open spaces, communal open spaces, balconies and green roofs have been provided within the development. A comprehensive *Landscape Planning Report* has been prepared by Mitchell + Associates and is submitted in conjunction with the application. The proposed Landscape Strategy has due regard for the existing landscape character of the site and surrounding area.

The proposal is consistent with Strategic Policy GIP6.

Strategic Policy SIP1 is in relation to planning for communities and outlines the need to identify and respond to the most vulnerable in planning for growth, for change or regeneration.

The proposed scheme is a direct response to the deficit in housing supply in Dublin and will contribute towards addressing the national housing crisis. It is also noted that 27 No. Part V units will be provided as per Part V of the *Planning and Development Act, 2000*.

The proposal is consistent with Strategic Policy SIP1.

⁵ Natura Impact Statement

Strategic Policy SIP2 acknowledges planning policy as a tool in creating a quality of life.

The subject scheme includes 133 No. residential units, artist studios, a creche, a retail unit and a gym and a range of high-quality public and communal open spaces have been proposed to cater for the recreational and amenity requirements of future residents and for the wider community. It is therefore considered that the proposal will provide for a high-quality standard of residential amenity for the future occupiers and wider community.

The sustainable location will reduce commuting times, in addition to the provision of open spaces and the promotion of public transport, walking and cycling as main modes of transport which will contribute to the quality of life of residents within the proposed development in proximity to a range of services and facilities.

The proposal is consistent with Strategic Policy SIP2.

Strategic Policy FP1 states that flood risk requires active management throughout the planning process.

The *Site Specific Flood Risk Assessment* by DBFL Consulting Engineers concludes the following key points:

"The SSFRA for the proposed development at Leydens Wholesalers & Distributors Dublin, No. 158A, Dublin 3 was undertaken in accordance with the requirements of the "Planning System and Flood Risk Management Guidelines for Planning Authorities", November 2009 and with reference to the requirements of the DCC Development Plan 2022 - 2028.

The SSFRA consulted several information sources which included reference to historic flood events. The Dublin City Council Flood Resilience Team, previous Tolka Flood Study, and the Strategic Flood Risk Assessments and Development Plan (2022-2028) were important sources that defined the existing fluvial and coastal flood risk to the site."

... It is concluded that as per the OPW Guidelines, the sequential approach has been applied, the proposed development has passed the necessary justification tests, the development does not increase flood risk elsewhere and the development's design incorporates measures to address flood risk."

The proposal is consistent with Strategic Policy FP1.

This section has clearly demonstrated that the proposed development comprising 133 No. residential units, retail units and artist studios is consistent with the relevant strategic policies set out the *Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022*.

6.2 ***Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031***

The *Regional Spatial and Economic Strategy* ("RSES") for the Eastern and Midlands Regional Assembly comprises a number of core Regional Policy Objectives which coincide with the

National Planning Framework (“NPF”). The purpose of the guidelines is to direct all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

The RSES includes various Regional Policy Objectives (“RPO”) and the relevant RPOs are discussed in this section.

Under RPO 4.3, ‘Consolidation and Re-intensification’ the following objective is stated:

‘Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs and ensure that the development of future development areas is coordinated with the delivery of key water infrastructure and public transport projects.’

The subject scheme will provide 133 No. residential units, artist studios, a creche, a retail unit and a gym on a brownfield site within the existing built-up area of Dublin City, therefore appropriately densifying this key underutilised site in a core urban location, in accordance with RPO 4.3.

The Metropolitan Area Spatial Plan (“MASP”) for Dublin contained within the RSES states the following:

- RPO 5.4: *‘Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines’, and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.*

As stated previously in this Statement, the proposed development fully responds to the National Planning Policy, in particular Section 5.6 - *Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines* and Section 5.5 - *Urban Development and Building Heights Guidelines for Planning Authorities*.

The MASP for Dublin contained within the RSES notes the following objective RPO 5.5:

‘Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.’

The subject site is contained within an established built-up area, a short distance from public transport and within cycling distance of the city centre.

It is our professional opinion that the proposed development provides an appropriate design response that will consolidate the predominately surrounding residential land uses as per RPO 5.5. The site can absorb a higher density residential development with community and commercial floorspace and public and communal open spaces at this location. The proposed development represents consolidated growth on a brownfield site.

Supporting environmental reports are submitted with this application to demonstrate the suitability of the site to accommodate the proposed development.

The RSES sets out the following in relation to 'Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking':

*'Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be achieved. This involves managing and facilitating the growth of Dublin and to increase the scale of our Regional Growth Centres to be able to provide the range of functions to their hinterlands. **This needs to be facilitated by appropriate, effective and sustainable infrastructure development in these centres, and at the same time avoid sprawl. This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure** - including broadband - in order to make the Region more connected and competitive. This will help to deliver high quality jobs that are well-paid and sustainable.'* [Our Emphasis]

The proposed development is located on appropriately positioned lands in proximity to public transport and employment locations.

The proposed scheme addresses the economic strategy by providing an appropriate, effective and sustainable development by virtue of the high-quality design and higher density residential development in an urban location preventing urban sprawl. Appropriately located residential accommodation within Dublin is important to the continued growth and maintenance of Ireland's response to the evolving needs of the modern, mobile workforce. In addition, the inclusion of artist studios, a creche, a retail unit and a gym and will create jobs for the area.

Under Section 8.1, the RSES states the following with regard to integrating land use and transport planning:

'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'

The subject development contributes to consolidated growth and the reduction in carbon emissions as it seeks to encourage future residents to avail of sustainable modes of transport through lower parking standards and the provision of 424 No. bicycle parking spaces and 10 No. electric scooter parking spaces for example.

Through the provision of green roofs, landscaping and planting, the development also helps maintain a high standard of natural and green infrastructure within an intensified and more dense residential setting. The public and communal open spaces provided within the development will also significantly enhance the green infrastructure of the area.

By locating in close proximity to public transport and in close proximity to employment, services and facilities, the subject development can be seen as a sustainable development pattern, which seeks to increase density, reduce car dependency, and improve permeability and legibility for the area. Therefore, the subject development contributes to consolidated

growth, towards the reduction in carbon emissions and represents a sustainable settlement pattern and is thus in accordance with Section 8.1.

Under Section 8.2, the *RSES* discusses responses to urban sprawl and justification for the move towards compact growth:

*'The Strategy aims to provide a spatial framework **to promote smart compact growth** as an alternative to continued peri-urban sprawl around our cities and towns, with a resultant negative impact on the environment and people's health and wellbeing due to increased commuting and loss of family and leisure time.'* [Our Emphasis]

The subject development seeks to provide a sustainable mixed-use development that is a welcoming and attractive alternative to a car dominated development, which is well located in proximity to public transport, employment locations, services and facilities.

The development promotes compact growth in accordance with Section 8.2. The location of this development on a site within close proximity of public transport and accessible to the city centre allows for reduced commuting time and greater work life balance for future residents.

Additionally, the provision of open spaces, artist studios, a creche, a retail unit and a gym aids in the facilitation and promotion of healthy lifestyles and social interaction between residents and the public, which will ultimately result in the creation of a strong sense of community.

The *RSES* Objective RPO 9.4 states that in relation to new apartment developments:

*'Design standards for new apartment developments **should encourage a wider demographic profile which actively includes families and an ageing population.**'* [Our Emphasis]

There are only a few examples of apartment developments along Richmond Road at present, however the area is currently in transition with higher density development recently granted in the area.

It is our opinion that there is a significant opportunity to densify this area of Dublin with a mix of 1 and 2 No. bedroom units. As such the scheme will cater for a wide cohort of persons.

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant Regional Policy Documents.

7.0 STATEMENT OF CONSISTENCY - LOCAL POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy and with due regard to the objectives and guidance as set out within the recently adopted *Dublin City Development Plan 2022-2028* ("Development Plan").

7.1 Zoning and Mix of Uses

7.1.1 Z10 Zoning in the *Development Plan*

The subject lands were previously zoned Objective Z10 'Inner Suburban and Inner City Sustainable Mixed-Uses' in the *Dublin City Development Plan 2016-2022*, where the stated aim was "to consolidate and facilitate the development of inner city and inner suburban sites for mixed-uses, with residential the predominant use in suburban locations, and office/retail/residential the predominant uses in inner city areas".

The *Dublin City Development Plan 2016-2022* has recently been replaced by the newly adopted *Dublin City Development Plan 2022-2028* ("Development Plan"). The Z10 zoning objective will continue to apply to the subject site, albeit the text and policies relating to the Z10 zoning has been amended in the newly adopted *Development Plan*. The zoning objective has been condensed slightly as:

"To consolidate and facilitate the development of inner city and inner suburban sites for mixed uses."

The additional guidance in the newly published *Development Plan* states that "...the purpose of this zoning is to promote mixed use in order to deliver sustainable patterns of development in line with the principles of the 15-minute city."

To provide more prescriptive guidance and greater clarity in relation to the quantum of different uses to be delivered on Z10-zoned lands, the *Development Plan* states:

*"In order to ensure that a mixed use philosophy is adhered to on Z10 zoned lands, the focus will be on delivering a mix of residential and commercial use. **There will be a requirement that a range of 30% to 70% of the area of Z10 zoned lands can be given to one particular use, with the remaining portion of the lands to be given over to another use or uses** (e.g. residential or office/employment). **For very small sites, typically less than 0.5ha, flexibility on mix requirement may be considered on a case-by-case basis**, where it can be demonstrated that the proposal would not result in an undue concentration of one particular land-use on the Z10 landholding as a whole."* [Our Emphasis]

Upon receipt of submissions made during the public consultation period on the newly adopted *Development Plan*, the *Chief Executive's Report on Draft Plan Consultation Process* stated that **"it is intended that the land use mix requirements relate to site area not GFA and relate to the Z10 landholding as a whole, rather than individual sites within."** [Our Emphasis]

Residential, retail, creche, artist studios and gym are all permissible on Z10-zoned lands. A masterplan and urban design rationale has been included for the site and also to show how

proposed Phase 1 and Phase 2 can work in tandem together. Please see the *Architectural & Urban Design Statement* for details.

7.1.2 Assessing the Proposal's Use-Mix Against the newly adopted *Development Plan*

The proposed development will align with supporting the delivery of mixed-use development, with residential as the primary use given the zoning's definition of this part of the city as "inner suburban". The non-residential or commercial uses – representing 31% of the site area – will provide additional vibrancy and street-level activation, augment available social and community infrastructure and broaden the enterprise and employment opportunities of the local area.

We note that there are historic difficulties associated with providing viable commercial activity along Richmond Road (comprehensively detailed in the neighbouring SHD application and acknowledged by Dublin City Council at pre-planning stage of the SHD application). In addition, we note that Dublin City Council granted permission in 2018 at the neighbouring Deakin Court residential development for the change of use from 2 No. commercial units to a residential unit with the Planning Officer noting *"the fact remains that the site is perhaps not best suited to having commercial activity at ground floor given location and this is a factor present for most such development in the Richmond Road area. In making their argument the applicant has hit on a central concern in general which is that any required commercial units may lie idle for a considerable period of time and this has been borne out by examples in the immediate area such as on Richmond Avenue and on Richmond Road itself"*.

Although the use-mix guidance requires a minimum of 30% of a Z10-zoned landholding to be dedicated to a secondary use or uses, the Design Team has taken a more conservative and deliberate approach by applying this 30% requirement to the subject site area even though they form part of a larger Z10 landholding at Richmond Road. The intention was to ensure that a fair and reasonable distribution of uses would and could be pursued at this location and without prejudicing the future development of adjacent and abutting Z10-zoned sites. Although there are concerns given the historic difficulties associated with securing viable commercial activity in the area, the scheme provides a retail unit, a creche, a gym and artist studios to accord with the *Development Plan*.

The scheme includes c. 1,703 sq m of commercial/non-residential uses which is equivalent to 31% of the developable site area. Therefore, the minimum requirement for 30% of the Z10 site area has been met, according with the *Development Plan*.

7.2 Density, Residential and Apartment Policies

Dublin City is the most densely populated settlement in the state, however it does not reach the levels of density seen in many major cities around the world. Towards the city core there are several examples of high-density areas, yet the majority of the metropolitan of Dublin area consists of lower densities which are more typical of suburban typologies.

The *Development Plan* includes the following policies, which support the attainment of great residential densities and land-use intensities, and accord with the overarching principles of the *NPF* requiring same:

Policy SC10 (Urban Density):

"To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable 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."

Policy SC11 (Compact Growth):

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

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

Policy QHSNg (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."

There is supporting policy within the *Development Plan* which promotes greater densities and the utilisation of infill/brownfield sites, such as the subject site on Richmond Road.

The *Development Plan* prescribes a series of residential density ranges for development across the city area. Table 1 of Appendix 3 of the *Draft Development Plan (Achieving Sustainable Compact Growth Policy for Density and Building Height in the City)* sets out the density ranges for the City as below:

Location	Net Density Range (units per hectare)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

The subject site does not naturally fit into these categories provided for density ranges as there is no "Inner Suburb" standard, especially having regard to the zoning objective pertaining to the lands in the *Development Plan*, which is Z10 'Inner Suburban and Inner City Sustainable Mixed-Uses'. [Our emphasis added.]

The site is not defined as the City Centre, Canal Belt, or within a SDRA, SDZ, LAP or Key Urban Village and was not formally zoned Z6. Therefore, the only remaining density range

that can apply to the site is “Outer Suburbs”, which sets out a range of 60-120 units per hectare, although Richmond Road is clearly not an Outer Suburb unlike Santry for example where this density range might be relevant.

The proposed development provides a residential density of 242 No. units per hectare which is considered consistent with the guidance set out in national planning policy for intermediate urban locations such as the subject site. In addition, we reiterate that this designation conflicts with the “*Inner Suburban and Inner City Sustainable Mixed-Uses*” designation pertaining to the site under the Z10 zoning, which clearly defines the location as Inner Suburban. It should be noted that the provision of 1 No. bedroom units and 2 No. bedroom units within the subject scheme also disproportionately inflates the density figure and should be considered in this context.

Having regard to all of these points, the proposed density and importantly the plot ratio of 2.65 is entirely appropriate for this Inner Suburban site.

7.3 Built-form: Site Coverage, Plot Ratio and Height

Development management standards and thresholds relating to site coverage, plot ratio and height work in conjunction with each other to define the bulk and scale of a development. This is then articulated and defined to distribute the massing as an appropriate and attractive built-form. Generally, when particular site coverage and plot ratio standards are set, they inform the height of a development.

7.3.1 Site Coverage and Plot Ratio

The site coverages and plot ratios set by the *Development Plan* for development are noted as being “*indicative*”, thereby indicating flexibility with respect to their applicability.

The *Development Plan* defines site coverage as:

“Site coverage is a control for the purpose of preventing the adverse effects of over development, thereby, safeguarding sunlight and daylight within or adjoining a proposed layout of buildings. It is a tool that is particularly relevant in urban locations where open space and car parking standards may be relaxed.”

The *Development Plan* defines plot ratio as:

“Plot ratio can help control the bulk and mass of buildings. It expresses the amount of floorspace in relation (proportionally) to the site area. Plot ratios can determine the maximum building floorspace area or volume on a given site, but on their own cannot determine built form. The same area or volume can be distributed on a site in different ways to generate different environments. Plot ratio should, therefore, be considered in conjunction with other development control measures including site coverage, building heights, public and private open space, parking provision etc.”

The site coverage and plot ratio for the proposed development are provided below alongside the standards outlined in the *Development Plan*. Again, the subject site does not naturally fit into these categories provided for density ranges as there is no “Inner Suburb” standard,

especially having regard to the zoning objective pertaining to the lands in the *Development Plan*, which is Z10 'Inner Suburban and Inner City Sustainable Mixed-Uses'.

The site is not defined as by the Development Plan as a Central Area, Regeneration Area or Conservation Area. Therefore, the only remaining plot ratio/site coverage range that can apply to the site is "Outer Employment and Residential Area".

Parameter	Site Coverage	Plot Ratio
<i>Development Plan</i> (Outer Employment and Residential Area)	45-60%	1.0-2.5
Proposed Development	73%	2.65

The indicative site coverage for lands in Outer Employment and Residential Areas is 45-60%. The proposed development of has a site coverage of 73% and is therefore slightly in excess of the indicative guidance provided in the *Development Plan*. However, it is our opinion that this site coverage is appropriate having regard to the site's sustainable location and the provision of a mix of residential, commercial and cultural uses in addition to large open spaces.

The indicative plot ratio for sites in Outer Employment and Residential Areas is 1.0-2.5 in the *Development Plan*. The proposed development has a plot ratio of 2.64 and therefore slightly exceeds the indicative plot ratio standard set out by the *Development Plan*, albeit the site is clearly not an Outer Suburban site. We consider this plot ratio to be acceptable at the subject lands given the high-quality scheme proposed with larger open space on sustainable lands which will provide a mix of uses for the area.

The site coverage of 73%⁶ and plot ratio of 2.65 is considered consistent with the guidance set out in national planning policy for intermediate urban locations such as the subject site. In addition, we reiterate that this "Outer" designation conflicts with the "Inner Suburban and Inner City Sustainable Mixed-Uses" designation pertaining to the site under the Z10 zoning. We further note that the standards are noted as "indicative" in the *Development Plan*. The site coverage and plot ratio of the subject scheme slightly exceeds these indicative "Outer" standards, however we consider these figures be acceptable at the subject site having regard to the high-quality scheme proposed on underutilised, sustainably located inner suburban lands, which will provide a mix of uses for the area.

Appendix 3 of the *Development Plan* notes that:

"Higher plot ratio and site coverage may be permitted in certain circumstances such as:

- *Adjoining major public transport 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 plot ratio.*
- *To facilitate the strategic role of significant institution/employers such as hospitals."*

⁶ (59% excluding podium communal open space)

In this regard, we note that the subject site is located proximate to public transport and provides a sustainable mix of residential and commercial uses. The site is also in need of urban renewal and the proposed development will replace a hard-standing warehouse site with a high-quality development. The development will also activate and enliven the streetscape along Richmond Road, which currently has an oppressive and blank façade.

7.3.2 Building Height

The recently adopted *Development Plan* is more flexible in relation to building height and allows a more locational based assessment of height to be carried out (when compared to the previous *Development Plan*). The proposed building height has been considered within the urban context and to achieve optimum density for the mixed-use typology, with setbacks provided throughout to provide a varied and interesting design.

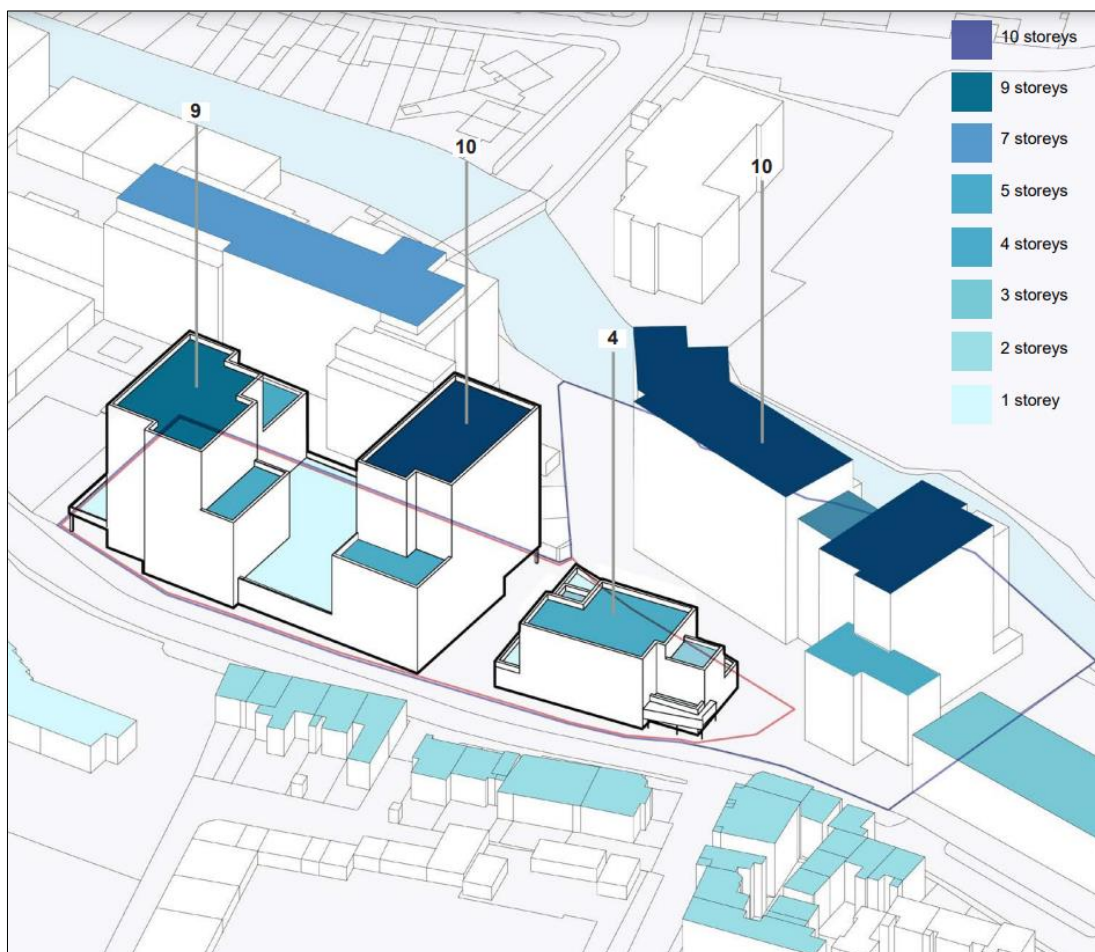


Figure 7.2: Map Showing Indicative Heights Proposed in the Subject Scheme

(Source: RKD Architectural & Urban Design Report, 2023)

Appendix 3 of the *Development Plan* has sought to accommodate a more flexible approach to the attainment of height given its recency and having been directed by SPPR1 of the *Building Height Guidelines*, which states:

"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city

cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."

The *Development Plan* notes that:

"Outside of the canal ring, in the suburban areas of the city, in accordance with the guidelines, heights of 3 to 4 storeys will be promoted as the minimum. Greater heights will be considered on a case by case basis, having regard in particular to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity and compliance with all of the performance criteria set out in Table 3."

Therefore, it is deemed necessary to comply with the criteria of Table 3 based on the design of the proposed development and as the prevailing height is generally lower in the immediate environs.

The proposed heights, which are detailed throughout this Report and in the materials prepared by RKD Architects, range from 1 No. to 10 No. storeys, with the latter featuring as only a portion of Block B. However, careful modulation of the built-form and appropriate separation distances ensure that these heights are respectfully and sympathetically achieved, cognisant of the surrounding properties which includes Protected Structures. Yet, increased heights play an important role at the subject site by creating an aesthetically attractive and unique overall design in lieu of an existing underutilised and unsightly warehouse development, which does not represent sustainable development of prime brownfield lands.

7.3.2.1 Compliance with Appendix 3 of the *Development Plan*

Informed by the above, the table below has been prepared and sets out the objectives and criteria of Table 3 from Appendix 3 of *Achieving Sustainable Compact Growth Policy for Density and Building Height in the City*, as well as responses illustrating how the proposed development complies with them. These various 'performance criteria' of Table 3 are set out under 10 No. 'objectives' in the *Development Plan*:

1. To promote development with a sense of place and character;
2. To provide appropriate legibility;
3. To provide appropriate continuity and enclosure of streets and spaces;
4. To provide well connected, high quality and active public and communal spaces;
5. To provide high quality, attractive and useable private spaces;
6. To promote mix of use and diversity of activities;
7. To ensure high quality and environmentally sustainable buildings;
8. To secure sustainable density, intensity at locations of high accessibility;
9. To protect historic environments from insensitive development; and
10. To ensure appropriate management and maintenance.

Objective	Criteria	Compliance
1 – To promote development with a	Respect and/or complement existing and established surrounding	The approach to the proposed design and its delivery of height has been conscious of the proximity of the subject site to the existing houses to the north at

Objective	Criteria	Compliance
sense of place and character	urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints.	<p>Richmond Road and the surrounding Protected Structures. Aligned with this, consideration has also been given to height as an integral aspect of a structure's overall design, in terms of modulation, massing and aesthetic, in combination with the proposed Phase 1 SHD planning application (currently awaiting a decision from An Bord Pleanála). These matters are then balanced against national, regional and local policy's emphasis on compact growth and more efficiently and sustainably using land within existing settlement.</p> <p>The scheme respects surrounding existing and proposed developments by providing gradual increases and transitions in height throughout the site. In summary, Block A is lower in height (up to 4 No. storeys) which ensures that the height transitions across the site from the Phase 1 development, with a pop-up 9 and 10 No. storey elements provided in Blocks B and C. In Block B in particular, which is opposite lower scaled dwellings on Richmond Road, a lower shoulder height has been provided onto Richmond Road with the building stepping up in height towards the rear of the site. Thus, the greater heights are proposed away from residential dwellings opposite on Richmond Road, with the height increasing as the site moves away from the street. The scheme is laid out in 3 No. linear blocks with the narrower northern gables fronting onto Richmond Road. This will ensure that the scheme is broken up and allows the development to breathe. This will break up the massing of the development as viewed from the surrounding area including the existing houses opposite on Richmond Road.</p> <p>In addition, it is considered that the proposed development will have a positive impact on the proximate Conservation Area by transitioning the site from a low-lying industrial nature to a high-quality, contemporary, mixed-use development. The site strategy has also duly considered the proximate Protected Structures and it is considered that the development will have minimal impact on their setting.</p> <p>This approach to the design has clearly sought to respect the existing, established and proposed surrounding urban structure, character and local context, scale, built and natural heritage, and</p>

Objective	Criteria	Compliance
		residential amenity, whilst according with relevant national, regional and local planning policy.
	Have a positive impact on the local community and environment and contribute to 'healthy placemaking'.	The proposed development will result in the redevelopment and regeneration of an underutilised brownfield site, thereby enhancing the public realm and the healthy placemaking through the creation of a more attractive and desirable environment. Open spaces, which are currently non-existent on the site, are proposed and will provide areas within which the public and community can play, socialise and exercise. Additionally, the provision of open spaces, artist studios, a creche, a retail unit and a gym aids in the facilitation and promotion of healthy lifestyles and social interaction between residents and the public, which will ultimately result in the creation of a strong sense of community.
	Create a distinctive design and add to and enhance the quality design of the area.	<p>The proposed design is thoroughly detailed in the documentation prepared by RKD Architects. The development will significantly improve the built-form and design at the site, which is currently comprised of a tired and dated warehouse that is blighting the streetscape along Richmond Road.</p> <p>The carefully designed, shaped and modulated development creates an attractive proposition, which will enhance the streetscape along Richmond Road, improving the relationship of the site with the surrounding area and will allow the residents and wider community to integrate.</p>
	Be appropriately located in highly accessible places of greater activity and land use intensity.	<p>The site is within a c. 10 No. minute walking distance to bus stops on Drumcondra Road Lower and a c. 17 minute walking to Drumcondra Train Station. The site is also within c. 700 metres – c. 1 km from the District Centre of Drumcondra.</p> <p>The site is easily linked with the rest of the City. The development will, in its own right, increase the activity and land-use intensity at this location by way of its mix of uses.</p> <p>See Section 2.0 for full details of the site's locational attributes and connectivity.</p>
	Have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a	Variation in height, scale and form have been detailed in response to the first criterion above. The approach has sought to respect the surrounding properties,

Objective	Criteria	Compliance
	site/adjacent development in an established area.	which includes Protected Structures, by modulating heights throughout the site.
	Not be monolithic and should have a well considered design response that avoids long slab blocks.	The proposed development is not monolithic in its design, especially having regard to the linear layout of the 3 No. blocks, which are provided on a north-south axis. Windows, door and balconies have been carefully located to ensure that the built-form is not monotonous. The linear layout of the blocks breaks down the proposed massing and allows the development to breathe. Furthermore, this block arrangement allows extensive opportunities for views into and out of the site and avoids a monolithic wall of new building along Richmond Road.
	Ensure that set back floors are appropriately scaled and designed.	<p>The setting back of upper levels is proposed as a means to gradually increase heights, whilst respecting the surrounding properties existing and proposed.</p> <p>As set out throughout this Report, Block A will be 4 No. storeys in height which will provide an appropriate transition from the proposed 6 No. storey element in Phase 1 fronting onto Richmond Road. Blocks B and C will be provided with pop-up 9 and 10 No. storey elements away from surrounding dwellings. With Block B proposing a lower shoulder height onto Richmond Road. Block C in proximity to Distillery Lofts (Protected Structure) steps down in height to 5 No. storeys.</p>
2 – To provide appropriate legibility	Make a positive contribution to legibility in an area in a cohesive manner.	<p>The design, scale and rhythm of the built-form, especially along the ground-level make the scheme a highly legible proposition. Carefully considered fenestration, enhancement of façade treatments, activation of street frontages and setting back of upper floors all combine to define the scheme's legibility.</p> <p>The 9 No. storey element of Block C plays a particularly important role in wayfinding and navigation as it sits in a prominent location as the road turns on Richmond Road.</p> <p>The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area especially due to the provision of public open spaces accessible from Richmond Road, which will ensure the legibility, permeability and quality of the public realm in the vicinity of the subject site is enhanced. The scheme allows for connections</p>

Objective	Criteria	Compliance
		between the Phase 1 and Phase 2 for the residents of both schemes. The public spaces will be easily accessible from Richmond Road and the connection between communal open space will be for the future residents only but noting easy access to the large volume of public open space in Phase 1.
	Reflect and reinforce the role and function of streets and places and enhance permeability.	<p>The proposed development will redefine the building line and streetscape along Richmond Road in combination with the proposed Phase 1 development, pending a decision from An Bord Pleanála, albeit much of the Richmond Road frontage is provided in the Phase 2 scheme. The ground floor level along Richmond Road will be provided with a mix of uses (artist studios, creche, gym and retail). These will be significant improvements when considered against a continuation of the <i>status quo</i> at the subject site.</p> <p>The upgrades proposed to Richmond Road will also improve permeability and safety for pedestrians, which is a significant planning gain.</p>
3 – To provide appropriate continuity and enclosure of streets and spaces	Enhance the urban design context for public spaces and key thoroughfares.	<p>There are 2 No. areas of public open space provided in the development – 1 No. between Blocks A and B and 1 No. to the west of Block A. Both spaces are easily accessible from Richmond Road, creating a more inviting and hospitable environment.</p> <p>Please also refer to the Landscape Planning Report (page 9) for areas of public open space provided which is a total of 606 sq m (11% of the development site area).</p> <p>The provision of this public open space will be a significant benefit to the local community. If planning permission is not granted for Phase 1, then 11% public open space is still provided for the Phase 2 lands. If the Planning Authority do not consider the public open space provided in Phase 2 to be adequate as a standalone (i.e. without the Phase 1 public open space), the Applicant can provide a financial contribution towards the development of public open space in the wider area if required.</p> <p>The proposed development also provides key thoroughfares for residents of the pending Phase 1 development and the proposed Phase 2 development by providing access between the sites for all future residents.</p>

Objective	Criteria	Compliance
		We would like to highlight that the Phase 1 development provides a significant quantum of public open space (1,501 sq m) including a Greenway along the River Tolka. On the Phase 1 lands, the public open space provision represents 25% of that site and is therefore well in excess of the 10% requirement.
	Provide appropriate level of enclosure to streets and spaces.	The approach to the design has sought to create a new built and active street edge along Richmond Road and to appropriately redefine this street edge away from the existing unattractive boundary condition. The scheme will enclose the streetscape in accordance with DMURS and the street will be activated.
	Not produce canyons of excessive scale and overbearing of streets and spaces.	<p>The tallest element of the proposed development is 10 No. storeys, however the modulation and variation in heights is such that it ranges from 1 No. to 10 No. storeys.</p> <p>As noted throughout this Report and in this Table, the linear arrangement of the blocks assists with breaking down the massing of the development which ensure that the development will not be excessive or overbearing.</p> <p>The avoidance of monolithic built-form that fails to connect to the context and is not of human scale has been a priority of the Design Team.</p>
	Generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3.	<p>The concept of pursuing a scheme that is perceived as being of human scale has been applied in the design. Heights vary throughout the scheme by way of modulation and setbacks. The taller Blocks B and C have been designed to have a building height ratio to the street of 1:1.5-1:3. Therefore, in our opinion, they never appear excessive or overbearing and will be within a human scale.</p> <p>The approach to materials, which include different brick colours, make the scheme visually accessible and intriguing and in combination with each other, give a sense of scale due to their relativity.</p> <p>The public and communal open spaces will be landscaped at a human scale. The improved public realm will be an attractive addition to the area. The communal open spaces for the residents which will be an attractive environment to enjoy.</p>
	Provide adequate passive surveillance and sufficient	Ample passive surveillance is provided throughout the development. Both public open spaces are overlooked

Objective	Criteria	Compliance
	doors, entrances and active uses to generate street-level activity, animation and visual interest.	by apartment and the various non-residential uses, the communal amenity spaces benefit from passive surveillance from the apartments. Carefully considered fenestration and brickwork articulate the ground floor level façades to ensure no blank elements. For example, the windows to the retail and commercial units will take the form of arches, which has taken inspiration from the nearby Distillery Lofts.
4 – To provide well connected, high quality and active public and communal spaces	Integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport.	New public open space areas, an important aspect of creating an attractive urban realm and streetscape, are proposed. The site currently lacks these and is comprised of built structures and hard-standing, in addition to a boundary wall which represents a blank and oppressive facade. Carefully designed planting and surfaces have been proposed by Mitchell + Associates that will benefit existing and future residents. Upgrades to Richmond Road are proposed including the provision of a cycle track/lane and the widening of footpaths, improving permeability and pedestrian safety. The sites proximity to public transport at Drumcondra is evidence of efforts to integrate higher density development with higher quality sustainable modes of transport.
	Be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards.	A balance was sought by the Design Team between securing open and accessible, but also intimate public open spaces. This is evidenced by providing easy access to the open spaces from Richmond Road, however the spaces are enclosed on one or two sides by built-form which ensures they are appropriately enclosed. The layout of the public open space also allows views into and out of the site while allowing a natural breakdown in perceived massing of the new buildings. The residential courtyard at podium level will be enclosed by built form on two sides, however the space will be open to the north and south, allowing a balance between enclosure and exposure.
	Ensure adequate sunlight and daylight penetration	As set out in the <i>Daylight and Sunlight Assessment Report</i> , 11 No. of the 12 No. assessed public and

Objective	Criteria	Compliance
	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.	<p>communal open space meet the criteria set out in the BRE Guidelines (at least 50% of their area receiving at least 2 hours of sunlight on 21st March). The creche play area is the only space that does not meet the recommended levels of sunlight, however 42% of the play space will receive 2 hours of sunlight on 21st March and thus is only slightly below the target value.</p> <p>In relation to the cumulative impact with Phase 1 considered, the <i>Daylight and Sunlight Assessment</i> states:</p> <p><i>"An additional study has been carried out for SOG to the proposed amenity spaces in the cumulative state. For this study, of the 12 no. of areas assessed, 8 no. areas would meet the criteria as set out in the BRE Guidelines. The areas not meeting the guidelines would be Communal Terrace 1, Communal Open Space, Creche Play Area and the Public Open Space (averaged area). Despite these areas failing to meet the BRE guidelines, future occupants will have access to other proposed amenity areas to enjoy good levels of sunlight within other proposed amenity areas."</i></p> <p>The design of the open spaces provided in Phase 2 ensures that they serve their intended purposes. If Phase 1 is granted permission, there will be ample choice of open spaces available in both schemes.</p>
	Ensure the use of the perimeter block is not compromised and that it [is] ⁷ utilised as an important typology that can include courtyards for residential development.	<p>As noted previously, there are 3 No. blocks proposed, which all have narrow gables fronting onto Richmond Road. The use of the ground floor of these blocks will be community or commercial floorspace abutting the Richmond Road boundary, which will enliven the streetscape.</p> <p>The layout of the development allows easily accessible public open spaces to be provided and the layout of Blocks B and C creates a high-quality semi-private podium which will comprise communal open space for residents. This podium will include a children's play space and will benefit from passive surveillance ensuring safety for all users.</p>
	Ensure that potential negative microclimatic effects (particularly wind	A <i>Microclimate Assessment</i> has been prepared by AWN Consulting and is enclosed separately. The

⁷The word [is] is missing from the *Development Plan*.

Objective	Criteria	Compliance
	impacts) are avoided and or mitigated.	Planning Authority is directed to this separate report, but it should be noted that its conclusion states: <i>"Based on the analysis conducted, it was concluded the proposed development would have no significant effects with regard to microclimate, either on amenity spaces in the vicinity of the development or within the development, or on podium, balcony or roof garden areas."</i>
	Provide for people friendly streets and spaces.	There will be limited vehicular activity within the subject scheme which provides a public realm that prioritises ease of movement for pedestrians and bikes (vehicular movements limited to the eastern boundary of the site which terminates at the rear of the site). The public and communal open spaces will be landscaped at a human scale. The improved public realm will be an attractive addition to the area. The communal open spaces for the residents which will be an attractive environment to enjoy. In addition, the development includes proposed upgrades to Richmond Road including a new cycle path/track and widened footpaths. Therefore, the proposal creates people friendly streets and spaces.
5 – To provide high quality, attractive and useable private spaces	Not compromise the provision of high quality private outdoor space.	Private amenity space is proposed for residents as terraces or balconies, as detailed in the documentation prepared by RKD Architects and Mitchell + Associates. These spaces meet and exceed the minimum requirements in terms of area. Terraces that interface with the communal amenity areas have adequate buffers to protect privacy and enhance residential amenity.
	Ensure that private space is usable, safe, accessible and inviting.	As discussed above, these spaces are appropriately sized, located and designed. They are positioned off main living areas rather than bedrooms and level access is provided. The balconies are also staggered or turn corners to ensure that adequate daylight infiltrates into units below.
	Ensure windows of residential units receive reasonable levels of natural light, particularly to	This aspect of the design has been considered and full details of the assessment are included in 3D Design Bureau's <i>Daylight and Sunlight Assessment</i> , which

Objective	Criteria	Compliance
	the windows of residential units within courtyards.	demonstrates significant compliance with the 3 rd Edition of BRE 209.
	Assess the microclimatic effects to mitigate and avoid negative impacts.	<p>A <i>Microclimate Assessment</i> has been prepared by AWN Consulting and is enclosed separately. The Planning Authority is directed to this separate report, but it should be noted that its conclusion states:</p> <p><i>"Based on the analysis conducted, it was concluded the proposed development would have no significant effects with regard to microclimate, either on amenity spaces in the vicinity of the development or within the development, or on podium, balcony or roof garden areas."</i></p>
	Retain reasonable levels of overlooking and privacy in residential and mixed use development.	<p>Inappropriate levels of overlooking have been avoided as part of the proposed development, with a balance struck between protecting privacy and residential amenity and ensuring adequate passive surveillance is secured.</p> <p>Ample separation distances and setbacks from surrounding properties have been proposed as discussed, thereby ensuring that the existing residences are not overlooked.</p>
6 – To promote mix of use and diversity of activities	Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure.	In accordance with this criterion and the principles of the Z10 land-use zoning, the proposed development is inherently mixed-use in nature. Whilst residential is the primary use (considered appropriate for this location), a creche, artist studios, a retail unit, and a gym are also proposed. Therefore, the proposed development will promote the delivery of mixed-use development.
	Contribute positively to the formation of a 'sustainable urban neighbourhood'.	<p>Several factors illustrate the proposed development's contribution to the formation of a 'sustainable urban neighbourhood':</p> <ol style="list-style-type: none"> 1. A broadening of the housing stock will enhance the demographic and socio-economic composition of the local area; 2. The mix of uses will meet the needs of future residents, as well as existing residents, and will also provide opportunities for employment; 3. Additional local population will support the attainment of critical mass required to sustain local services and businesses; 4. Greater provision of local services and amenities reduces the dependency to travel further (and potentially use a car) to avail of same, aligning with the principles of the 15-minute city;

Objective	Criteria	Compliance
		<p>5. Low car parking provision, ample cycle parking and proposed car share services are considered means through which to reduce car ownership and use rates to environmentally and socially sustainable levels;</p> <p>6. The provision of public open space and an enhancement of the road network, built-form and public realm in this area are much-needed given the blighted appearance of the existing site and its failure to provide notable aesthetic, social, ecological and economic benefits.</p>
	Include a mix of building and dwelling typologies in the neighbourhood.	It is considered that the proposed development will have a positive impact on the character of the area, by transitioning the site from its low-lying industrial nature to a higher density, mixed-use contemporary scheme, in line with national policy discourse. This is intended to occur concurrently with Phase 1, which is awaiting a decision from An Bord Pleanála (but both schemes can also operate independently). The mix of dwelling types and sizes proposed will enhance the existing housing stock in the neighbourhood.
	Provide for residential development, with a range of housing typologies suited to different stages of the life cycle.	<p>The mix of apartment types (1-bed, 2-bed (3-person) and 2-bed (4-person)) accord with SPPR 1 of the <i>Apartment Guidelines, 2022</i>. Furthermore, they will add to the stock of housing in the area and broaden its mix given it is predominantly comprised of houses, with a smaller number of apartments in the vicinity.</p> <p>The units are designed to be adaptable and flexible in order to suit different stages of the life cycle. In this regard, 26% of all units are compliant with the Universal Design Guidelines for Homes in Ireland and other units are also adaptable to be Universal Design Compliant if needed in the future.</p>
7 – To ensure high quality and environmentally sustainable buildings	Be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light.	<p>The modulation of height, which varies from 1 No. to 10 No. storeys, ensures that the proposed development is not monolithic in its built-form, with its scale and massing distributed appropriately.</p> <p>Per the results of 3D Design Bureau's <i>Daylight and Sunlight Assessment Report</i>, the scheme performs well and we note that the design of the subject scheme has evolved through a creative process, in conjunction with the results of the <i>Daylight and Sunlight Assessment Report</i> to ensure an attractive living environment for future residents which has a limited impact on the amenity of surrounding properties.</p>

Objective	Criteria	Compliance
		<p>Shifted height and massing allow for natural ventilation to be achieved, with no long, unbroken sections of building proposed. The height of the subject scheme modulates throughout the site in the form of 3 No. linear blocks provided in a north-south direction sitting 90 degrees to Richmond Road.</p> <p>Privacy is secured by way of separation distances, planted and 'hard' screening/buffers, and offset windows and balconies.</p>
	Not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain.	3D Design Bureau's <i>Daylight and Sunlight Assessment Report</i> indicates that there will be limited impacts on surrounding properties however the scheme has undergone numerous design iterations in order to minimise impacts on surrounding properties.
	Ensure a degree of physical building adaptability as well as internal flexibility in design and layout.	The design of the proposed development considered adaptability and the prospect of different uses in the future. As noted above, some 26% of units are compliant with the Universal Design Guidelines for Homes in Ireland and other units are also adaptable to be Universal Design Compliant if needed in the future. Ground floor commercial units can be adapted to provide a different commercial use if needed in future.
	Ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive.	RKD Architects have sought to minimise rooftop plant and infrastructure, as is demonstrated in their submitted architectural materials and the CGIs and Verified View Photomontages prepared by 3D Design Bureau and assessed in the <i>Landscape and Visual Assessment</i> prepared by Mitchell + Associates.
	Maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage.	A total of 93 No. of the 133 No. proposed units are dual (or triple) aspect in their design, equivalent to 70%. This is a notably rate of provision and substantially exceeds the 50% minimum requirement for this location.
	Be constructed of the highest quality materials and robust construction methodologies.	This design principle has been applied in the proposed development. Brick, rather than render, is the predominant material used, which is more robust and requires less maintenance and upkeep.
	Incorporate appropriate sustainable technologies,	The <i>Climate Action and Energy Statement incorporating Part L for Planning</i> Compliance prepared by Axiseng Consulting concludes that:

Objective	Criteria	Compliance
	be energy efficient and climate resilient.	<p><i>"The development complies with the Part L and NZEB requirements and is achieving an A2 BER... The overall results show that the units are performing & exceeding the requirements to meet Part L and NZEB compliance. The combination of efficient plant & high performing envelope details ensures thermal comfort for occupants and minimal energy use."</i></p> <p>Full details of the intended sustainable technologies, energy efficiencies and climate resilience are detailed in the <i>Climate Action and Energy Statement incorporating Part L for Planning Compliance</i> prepared by Axiseng Consulting.</p>
	Have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sun lighting proposals. Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or securing wider objectives such as comprehensive urban regeneration or an effective urban design and streetscape solution.	<p>As noted previously, the scheme has evolved in tandem with the <i>Daylight and Sunlight Assessment Report</i>. Please see conclusion below from the report by 3D Design Bureau:</p> <p><i>"This impact study has considered two different scenarios: the impact of Phase 2 on its own and secondly, the impact of the cumulative state (Phases 1 and 2). Furthermore, an additional impact assessment has been carried out to quantify the effect Phase 2 would have on the windows of Phase 1 and on the proposed amenity areas of Phase 1 also."</i></p> <p><i>Whilst the results for VSC for Phase 2 only could be considered acceptable, the cumulative impact to the surrounding properties is greater. However it is to be expected given the density targeted for the overall masterplan of the site and encouragingly, very little impact to the sunlight of existing windows would happen in this cumulative state. The impact to the Sun on Ground (SOG) of surrounding properties can be considered acceptable as the front gardens impacted are mostly used as private car park spaces."</i></p> <p><i>The impact of Phase 2 on Phase 1 can also be considered acceptable. The architects worked closely with 3DDB to minimise the impact on Phase 2, which has improved since the pre-application stage after design mitigation."</i></p>

Objective	Criteria	Compliance
		<p><i>The scheme performance assessment for this report has quantified the level of daylight (SDA) and sunlight (SE and SOG) within the proposed development. As per the impact assessment, this study was carried out in two different scenarios:</i></p> <p><i>The surrounding context in its existing state (Phase 1 excluded) and secondly in the cumulative state (surrounding context including Phase 1 Reg. Ref. TA29N.312352).</i></p> <p><i>In both scenarios, the scheme performance has yielded very positive results for the daylight (SDA), with compliance rates ranging from ~94% to ~98%.</i></p> <p><i>The Sunlight Exposure (SE) assessment has also provided favourable results in both assessments with compliance rates ranging from ~78% to ~86%.</i></p> <p><i>The proposed amenity areas have also been assessed for SOG under the two different states (Phase 2 only and cumulative). For Phase 2 only, the SOG would be ~92% compliant, whilst in the cumulative state, 4 no. of areas would not meet the recommendations for sunlighting on March 21st. However, as seen in the hourly shadow diagrams on section F.0 on page 135, these areas would receive sunlight between approximately 11am and 3pm during summer-time. Furthermore all occupants will have access to a number of open amenity spaces throughout the development.</i></p> <p><i>In conclusion, whilst there will be a level of impact to surrounding properties, this needs to be considered having regard to wider planning and housing policies and the masterplan of this site along with what the proposed scheme will bring to the area when compared to what is currently on site.</i></p> <p><i>Finally, for future occupants of the scheme they can expect to enjoy good levels of daylight and sunlight within the proposed development."</i></p> <p>We note that Section 5.3 of the <i>Daylight and Sunlight Assessment Report</i> by 3D Design Bureau sets out the compensatory design measures for the scheme in relation to the units that could be considered to be</p>

Objective	Criteria	Compliance
		underperforming. These measures include large apartment sizes, dual aspect provision and large private terraces.
	Incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place.	<p>For full details of the proposed water services strategy, please refer to the materials prepared by DBFL Consulting Engineers and submitted under separate under cover.</p> <p>Included in Section 5 of the Infrastructure Design Report submitted as part of this application, is an Integrated Surface Water Management Plan/Strategy. The Surface Water Management Plan includes nature-based drainage measures such as permeable paving, SuDS tree pits and green/blue roofs and podiums to enhance runoff quality, amenity and biodiversity as well as reduce runoff quantity. In addition to the suite of SuDS features, a private surface water sewer network is proposed throughout the site to drain and attenuate any excess surface water within the proposed development and discharge into the existing surface water sewer in Richmond Road at a controlled rate.</p>
	Include a flood risk assessment.	A <i>Site-Specific Flood Risk Assessment</i> has been prepared by DBFL Consulting Engineers and is included under separate cover.
8 – To secure sustainable density, intensity at locations of high accessibility	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.	<p>Please refer to Section 2.0 for full details of the sites' accessibility and wider connectivity, which are summarised below:</p> <ul style="list-style-type: none"> The subject site is considered eminently suitable for the proposed development given the availability of sustainable modes of transport such as Drumcondra Railway Station (c. 1.3 km / c. 17 minutes walking distance) and bus stops on Drumcondra Road (c. 800 metres / c. 10 minutes walking distance). The site is also linked with other modes of public transport. For example, bus route No. 1 provides a connection to the LUAS at Abbey Street. Bus services will be further enhanced and improved as BusConnects is rolled out to a

Objective	Criteria	Compliance
		<p>greater extent in the coming months and years.</p> <ul style="list-style-type: none"> The development proposes bicycle parking in excess of requirements which will promote sustainable development. A study on the capacity of public transport in the area has been prepared by DBFL Consulting Engineers and is enclosed in the Traffic and Transport Assessment.
	Look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.	An appropriate development footprint (site coverage) of 73% is proposed. This has been optimised, ensuring: it generally aligns with the Development Plan standard, the 10% public open space requirement is met, access to the undercroft car parking is safely designed and located, loading bays are included, and the scheme does not result in excessive height in order to achieve appropriate floor area (i.e. plot ratio).
9 – To protect historic environments from insensitive development	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.	The proposed development has duly considered its surroundings including nearby Protected Structures and Conservation Area as concluded in the Architectural Heritage Impact Assessment prepared by Historic Building Consultants. The National Monuments Service's website, archaeology.ie, does not indicate the existence of any monuments on the application site or on adjoining lands.
	Be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed.	<p>An <i>Ecological Impact Assessment</i> has been prepared by Enviroguide Consulting. It ultimately concluded that:</p> <p><i>"It is considered that provided the mitigation measures proposed are carried out in full, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the Proposed Development."</i></p> <p><i>There will be an overall positive impact in terms of biodiversity as a result of the Proposed Development; through the general increase in vegetation and tree cover at the Site compared to the current situation (entirely hard-standing ground cover). It is expected that this will increase the habitat provision at the Site for local insect, bird and bat species in the area."</i></p> <p>Further discussion is provided in the report itself, which is submitted under separate cover.</p>

Objective	Criteria	Compliance
	Assess potential impacts on keys views and vistas related to the historic environment.	No key views or vistas are identified at or within the environs of the subject site. Notwithstanding this, a detailed <i>Landscape and Visual Impact Assessment</i> has been prepared by Mitchells + Associates to assess visual impacts more generally. It concluded that there would be no significant negative visual impacts as a result of the delivery of the proposed development.
10 – To ensure appropriate management and maintenance	Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.	The following reports have been prepared to guide the future maintenance and management of the proposed development: <ul style="list-style-type: none"> • <i>Operational Waste Management Plan</i> • <i>Property Management Strategy Report</i> • <i>Mobility Management Plan</i> • <i>Building Lifecycle Report</i> • <i>Landscape Planning Report</i>

Therefore, having regard to the above points in response to Table 3 of Appendix 3 of the *Development Plan*, it is firmly contended that the proposed height can be absorbed at the subject site.

7.4 Open Space

Open space in a general sense for development projects is categorised as public open space, communal amenity space and private open space. Public open space is publicly accessible land that future residents can use, as well as the existing local community or passers-by. Communal amenity space is semi-private in its intention and proposed for the use of future residents of a proposed development, thereby allowing for relaxation, socialising and integration. Private open space is provided on a dwelling-by-dwelling basis, with individual spaces designed solely for the private use by the residents of each unit.

The following sub-section in relation to open space and landscaping should be read in conjunction with the materials prepared by Mitchell + Associates.

7.4.1 Public Open Space

With respect to public open space provision, the Design Team recognises Policy GI28 of the *Development Plan* which is:

"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."

Noting that residential is the primary element of the proposed mixed-use development, the intention has been to comply with the *Development Plan* requirement for 10% of the site area to be dedicated to public open space.

The scheme provides 606 sq m of public open space on a developable site area of c. 5,500 sq m, which represents 11% of the site. If Phase 1 is granted, it is intended that both developments will operate in tandem and the overall public open space can be shared between both phases. Please see figures below:

	Site Area (sq m)	POS Proposed (sq m)	Percentage
Phase 1 Public Open Space (ABP Reg. Ref. TA29N.312352)	6,067	1,501	25%
Phase 1 Additional Public Plaza (ABP Reg. Ref. TA29N.312352)	6,067	198	3%
Phase 2 Public Open Space (Subject Application)	5,500	606	11%
Total	11,567	2,305	17.85%

The provision of this public open space will be a significant benefit to the local community. If planning permission is not granted for Phase 1, then 10% public open space is still provided for the Phase 2 lands. If the Planning Authority do not consider the public open space provided in Phase 2 to be adequate as a standalone (i.e. without the Phase 1 public open space), the Applicant can provide a financial contribution towards the development of public open space in the wider area.

We would like to highlight that the Phase 1 development provides a significant quantum of public open space (1,501 sq m) including a Greenway along the River Tolka. On the Phase 1 lands, the public open space provision represents 25% of that site and is therefore well in excess of the 10% requirement. This will ensure that ample public open space has been provided for on the overall development lands, which will be a significant benefit for the wider area.

As noted in the table above, the Phase 2 scheme provides 606 sq m of designated public open space (11% of the developable site), which are located to the west of the artists studios and between Blocks A and B. The development also provides 43 sq m of external open space for the creche and 173 sq m for the artist studios. Please see Figure 7.3 below prepared by RKD Architects to demonstrate the open spaces proposed:



Figure 7.3: Image Showing Location of Proposed Open Space Provision

(Source: RKD Architects, 2023)

7.4.2 Communal Open Space

The communal open space standards of the *Development Plan* align with those set by the *Apartment Guidelines, 2022*:

Unit Type	Communal Open Space Standard	No. of Units Proposed	Communal Open Space Requirement
1-bed	5 sq m	65	325 sq m
2-bed (3-person)	6 sq m	9	54 sq m
2-bed (4-person)	7 sq m	59	413 sq m
Total		133	791 sq m

The development results in a total requirement for 791 sq m of communal open space to be provided. The development proposes to provide 1480 sq m of outdoor high-quality landscaped communal open space, including at podium level and in upper level communal roof gardens. Thus, the scheme provides more than twice the required communal open space needed for the subject development.

7.4.3 Private Open Space

The private open spaces are being designed as balconies, with minimum depths of 1.5 metres and with areas that align with the minimum requirement of the *Development Plan*, which are informed by the *Apartment Guidelines, 2022*:

Unit Type	Private Open Space
1-bed	5 sq m
2-bed (3-person)	6 sq m
2-bed (4-person)	7 sq m

All units have been provided with private open space in accordance with these minimum standards. Please see the Housing Quality Assessment Table prepared by RKD Architects.

7.5 Community / Cultural Space

The *Development Plan* notes the following Objective in relation to provision of communal / cultural spaces:

CUO25 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 for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*

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

In response, the scheme provides artist studios in the ground floor of Block A, as discussed throughout this Report. We note that the artist studios were proposed to be provided prior to the introduction of this policy and are intended to be occupied by the Richmond Road Studios who have been searching for a new location since they received notice of their eviction from existing premises on Richmond Road. Further to their eviction and search for new space, the Applicant had liaised with the Richmond Road Studios prior to the Objective being finalised in the *Development Plan*, in order to ensure a suitable space was being provided on site to accommodate their needs.

As a result, we consider it appropriate to provide a single cultural/community use in this instance as this use will accommodate local artists who urgently require this new space. In this specific context, the Applicant does not feel it is fair or appropriate to renege on their agreement with the Richmond Road artists, which as set out above was in discussion prior to the 5% policy being formalised in the new *Development Plan*, which asks for the consideration of both community and cultural uses.

The scheme proposes 17 No. artist studio rooms in addition to an exhibition area and communal space with a shared kitchen area, which will be a significant benefit for the area. Some of the artist studios are larger in size to allow artists to work collaboratively which will provides flexibility within this community use.

The total gross floor area of the artist studios is c. 749 sq m which is 8% of the total residential and commercial net floor space (c. 9350.1 sq m) and is thus in accordance with Objective CUO22 of the *Development Plan*.

The *Cultural Infrastructure (Impact) Assessment* enclosed prepared by Turley sets out the justification for providing a cultural/arts use only as part of the required 5%. We do note

however that the proposed development also includes a creche which could be considered a community use, surplus to the 8% cultural use being provided. The *Cultural Impact Assessment* concludes the following:

"We believe this report sets out clear evidence base to justify the 5% is deliver to one sector i.e. artist workspace – cultural space. Viability is also under stress due to the macro environment and increased construction costs therefore additional community space, may hinder the scheme coming forward, whilst in contrast the lease agreement proposed provides a long-term cultural tenant and operator of the studios...There is a strong case for progressing with the proposals as described, our assessment demonstrates a clear need and an opportunity for positive cultural impact at a local level in terms of contributing to the social and economic regeneration of the area as well as at city level in terms of contributing to cultural infrastructure needs and addressing gaps."

7.6 Dwelling Mix

Special Planning Policy Requirement (SPPR) 1 of the *Apartment Guidelines, 2022* states the following in relation to dwelling mix:

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

We note that the *Development Plan* does include a HNDA. However, the subject site falls outside of the 'sub-city' areas of 'Liberties' and 'North Inner City', which underwent detailed analysis to inform more appropriate unit mix targets therein. Consequently, the HNDA confirms that *"SPPR 1 is applicable to the remainder of the Dublin City Council administrative areas."*

It is also noted that the *Apartment Guidelines, 2022* highlights a general preference that 2-bed, 3-person units do not account for more than 10% of the apartment mix.

The proposed development comprises no studio units, and 1-bed units do not exceed 50% of the total provision. In addition, 2-bed, 3-person units do not exceed 10% of the total mix.

Unit Type	No. Units	Percentage Mix
1-bed	65	49%
2-bed (3-person)	9	7%
2-bed (4-person)	59	44%
Total	132	100%

In addition, we refer to Objective QHSNO11 and Section 15.9.2 of the *Development Plan* which requires the following in relation to the provision of larger units and the provision of universal design units:

Objective QHSNO11

"Universal Design

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."

Section 15.9.2

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

In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people, people living with dementia and people with disabilities."

The scheme provides 78 No. oversized units which represents 59% of the overall unit provision. Of these 59% oversized units, some 51% are designed to be universal design (26% of the total units provided).

Therefore, the proposed development is in accordance with the *Development Plan* and the specific standards of the *Apartment Guidelines, 2022* (SPPR 1), and will support the delivery of much need housing in the area, and will achieve the proper and sustainable development of the subject site.

7.7 Car Parking

7.7.1 Proposed Car Parking Policy Basis

The provision of car parking is increasingly being balanced between supporting the mobility needs and preferences of the City's residents and workers and sustainability, with the Council clearly supporting reduced rates, in accordance with national policy, such as that featuring *Apartment Guidelines, 2022*. The *Apartment Guidelines, 2022* explicitly states the following in respect of development in 'Intermediate Urban locations' (within which the subject site is located):

*"In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), **planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard**".*
[Our Emphasis]

The *Development Plan* emphasises the need for continued and greater modal shift away from private car use to more sustainable active and public transport modes. This is also being actioned by low car parking standards, with Policy SMT27 (Car Parking in Residential and Mixed Use Developments) as once such example of Council action in support of same:

*"(i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.
(ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.
(iii) To safeguard the residential parking component in mixed-use developments."*

Appendix 5 of the *Development Plan* sets a series of maxima standards for uses in Parking Zone 2, which have been extracted below:

Use	1 No. Space Per	Proposed	Max. Spaces
Residential	Dwelling	133 No. Dwellings	133
Other Retail and Main Street	275 sq m	335 sq m	2
Artist Studios	Dependent on Nature and Location of Use	749 sq m	-
Creche	100 sq m	156 sq m	2
Sports and Recreation	Dependent on Nature and Location of Use	-	-

Whilst these standards are clearly stated as being "*maximum*" in the *Development Plan*, it also states that "*a relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location*", subject to meeting several criteria. These criteria (Appendix 5 of the *Development Plan*) have been summarised and responded to below:

Criteria	Compliance
Locational suitability and advantages of the site.	<ul style="list-style-type: none"> The site is within a c. 10 minute walk of a Quality Bus Corridor and c. 17 minutes walk of Drumcondra Train Station.

	<ul style="list-style-type: none"> • Proximate to quality cycle infrastructure. • Brownfield, regeneration site. • Prospect to act as a catalyst for wider regeneration in tandem with proposed Phase 1 (decision awaited).
Proximity to High Frequency Public Transport services (10 minutes' walk).	<ul style="list-style-type: none"> • The site is within a c. 10 minute walk of a Quality Bus Corridor and c. 17 minutes walk of Drumcondra Train Station.
Walking and cycling accessibility/permeability and any improvement to same.	<ul style="list-style-type: none"> • Ample bicycle parking is proposed as part of the development. • The improvement to the public realm along Richmond Road and provision of public open space easily accessible from Richmond Road will be a significant benefit for the area.
The range of services and sources of employment available within walking distance of the development.	<ul style="list-style-type: none"> • The site is within a c. 10 minute walk of a Quality Bus Corridor and c. 17 minutes walk of Drumcondra Train Station, providing access to a wide variety of employment and other services. • The site will also provide local services such as retail, creche, gym and artist studios which will benefit the local community.
Availability of shared mobility.	<ul style="list-style-type: none"> • Some 3 No. car share spaces is proposed as part of the development.
Impact on the amenities of surrounding properties or areas including overspill parking.	<ul style="list-style-type: none"> • The proposed quantity of residential car parking is deemed to be sufficient to meet the needs of future residents and their visitors. • Ample cycle parking will support the this as an alternative mode. • Car sharing will enhance the efficiency of the car parking provision, improving the 'effective car parking ratio'.
Impact on traffic safety including obstruction of other road users.	<ul style="list-style-type: none"> • Car parking is proposed in a safe and accessible location undercroft.
Robustness of Mobility Management Plan to support the development.	<ul style="list-style-type: none"> • A robust <i>Mobility Management Plan</i> has been prepared by DBFL Consulting Engineers

Informed by the foregoing policy basis in support of low levels of car parking provision, the development includes some 25 No. surface car parking spaces (24 No. for residential units and 1 No. for the creche):

- 24 No. standard resident spaces including 3 No. car share spaces, 2 No. mobility impaired spaces and 13 No. electric vehicle spaces.
- 1 No. creche car parking space.

Based on the provision of 24 No. residential car parking spaces, a car parking ratio of 0.18 is achieved. In addition, 1 No. loading bay is provided internal to the site and an additional loading bay is provided on Richmond Road. A total of 13 No. electric vehicle parking spaces are provided for residents, while all remaining spaces will be provided with EV ducting infrastructure.

It is expected that the creche, gym, retail and artist studios will serve localised catchments, which are catered for with ample bicycle parking and are within short walking journeys of public transport.

By providing a reduced level of car parking provision, the subject scheme seeks to encourage future residents to either walk or cycle and all or the amenities contained therein or avail of the public transport in close proximity to the subject site. Therefore, the reduced provision of car parking for the subject scheme will contribute to consolidated growth and the reduction in carbon emissions by discouraging car ownership.

7.7.2 Bicycle Parking

The *Development Plan* has the following bicycle parking requirement (set out in Table 1 of Appendix 5):

Use	1 No. Space Per		Proposed	Required Spaces	
	Long Stay	Short Stay		Long Stay	Short Stay
Residential	Bedroom	2 No. apartments	133 No. Dwellings	201	66
Retail	5 No. staff ⁸	100 sq m	335 sq m	2	3
Artist Studios (Cultural and Recreational Buildings)	Land Use Class not Listed ⁹ 1 per 5 No. staff applied ¹⁰	Land Use Class not Listed 1 per 100 sq m GFA applied	749 sq m	2	8
Creche	1 per 5 staff ¹¹	1 per 10 children ¹²	156 sq m (10 No. staff, 35 No. children)	2	5
Gym	1 per 5 staff ¹³	1 per 50 sq m	262 sq m	1	6
Total				208	88

Therefore, the requirement for bicycle parking according to the *Development Plan* is 280 No. (208 No. long stay and 88 No. short stay).

The subject scheme includes the provision of 424 No. bicycle parking spaces including 2 No. cargo bicycle parking spaces (and an additional 10 No. electric scooter storage spaces), which is in excess of the standards outlined in the *Development Plan*. Accordingly there is more than sufficient additional bicycle parking spaces available to serve the artist studios. The total

⁸ Based on 10 No. staff according to DBFL Consulting Engineers.

⁹ According to the *Development Plan*, "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". 'Community' standard is applied.

¹⁰ Based on 10 No. staff according to DBFL Consulting Engineers.

¹¹ Based on 10 No. staff according to DBFL Consulting Engineers.

¹² Based on 35 No. children.

¹³ Based on 5 No. staff according to DBFL Consulting Engineers.

breakdown of the proposed 424 No. spaces is 336 No. long-stay and 88 No. short stay bicycle parking spaces.

The *Apartment Guidelines, 2022* outlines a standard of 1 No. cycle parking space per bedroom and 1 No. visitor space per two units, which would result in 265 No. residential bicycle parking spaces (201 No. long stay and 66 No. short stay). Therefore, the proposal exceeds the standards outlined in the *Apartment Guidelines, 2022*.

7.8 Response to Other Relevant Policies/Objectives of the *Development Plan*

Chapter No.	Section	Policy / Objective Number	Policy / Objective	Comment
Chapter 2 – Core Strategy	2.7.1	CSO5	Programme for the Preparation of Local Environmental Improvement Plans To implement a programme for the preparation of Local Environmental Improvement Plans and to prioritise areas in accordance with the strategic objectives of the core strategy. (Richmond Road is included on the list)	The Applicant is happy to liaise with Dublin City Council in relation to any future preparation of a Local Environmental Improvement Plan.
Chapter 3 – Climate Action	3.5.2			
		CA8	Climate Mitigation Actions in the Built Environment To 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;	A <i>Climate Action and Energy Statement incorporating Part L</i> for Planning Compliance prepared by Axiseng Consulting Engineers is enclosed separately which comprehensively considered these items. In relation to part (a), the scheme will be appropriately ventilated and as demonstrated in the Daylight and Sunlight Assessment, the proposed development will receive quality daylight. The site is located proximate to active and public transport modes.

			<p>f. minimising the generation of site and construction waste and maximising reuse or recycling;</p> <p>g. the use of construction materials that have low to zero embodied energy and CO₂ emissions; and</p> <p>h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.</p>	
		CA9	<p>Climate Adaptation Actions in the Built Environment</p> <p>Development proposals 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:</p> <p>a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;</p> <p>b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;</p> <p>c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);</p> <p>d. reducing flood risk, damage to property from extreme events– residential, public and commercial;</p> <p>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;</p> <p>f. promoting, developing and protecting biodiversity, novel urban ecosystems and green infrastructure.</p>	<p>The scheme includes green roofs, SuDS measures, flood prevention measures, significant opportunities for biodiversity and green infrastructure enhancement and thus has demonstrated that the scheme will be a sustainable climate friendly development</p>
		CA10	<p>Climate Action Energy Statements</p> <p>All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as</p>	<p><i>A Climate Action and Energy Statement incorporating Part L for Planning Compliance prepared by Axiseng Consulting Engineers is enclosed separately. Heating and low carbon solutions are detailed as part of the proposed strategy for the development.</i></p>

			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.	
	3.5.3	CA15	<p>Waste Heat, District Heating and Decentralised Energy</p> <p>To actively encourage the development of low carbon and highly efficient district heating and decentralised energy systems across the city utilising low carbon heat sources such as renewable energy and waste heat recovery and to promote the connection of new developments to district heating networks where such systems exist/can be developed in a given area.</p>	<p>A Climate Action and Energy Statement incorporating Part L for Planning Compliance prepared by Axiseng Consulting Engineers is enclosed separately. The report notes:</p> <p><i>"While the current design model is based on hot water heat pump system solution to achieve Part L and NZEB compliance and taking into account design progress in energy efficient solutions a number of alternative solutions had been reviewed during the planning stage energy modelling process. When the design moves into further detail stages the latest technologies will be further reviewed to ensure the most effective solution for the project is utilised. Adhering to planning conditions & building regulations, alternate M&E systems may be explored for the scheme. Should district heating become available within the zone of the development in future, we will liaise with local councils working to incorporate this into the development where possible."</i></p>
		CA17	<p>Supporting the Potential of District Heating in Dublin City</p> <p>To support, encourage and facilitate the potential of district heating in Dublin City, all Climate Action Energy Statements submitted to the Council (see Policy CA10) shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources. In addition:</p>	<p>The current proposed scheme does not cater for district heating. The Climate Action and Energy Statement incorporating Part L for Planning Compliance prepared by Axiseng Consulting Engineers states:</p> <p><i>"Should district heating become available within the zone of the development in future, we will liaise with</i></p>

			<ul style="list-style-type: none"> Climate Action Energy Statements for significant new residential and commercial developments in Strategic Development and Regeneration Areas (SDRAs), will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to an available or developing district heating network in the area. Climate Action Energy Statements for significant new residential and commercial developments in the Docklands SDRA will assess the feasibility of making the development 'district heating enabled' in order to facilitate a connection to the Dublin District Heating System. 	<i>local councils working to incorporate this into the development where possible."</i>
		CA18	<p>Capture and Utilisation of Waste Heat</p> <p>To encourage proposed and existing developments and facilities (such as data centres) to capture and utilise otherwise wasted heat, and use waste heat either on-site, or in an adjoining, and nearby sites, in compliance with all relevant Energy Efficiency Regulations.</p>	The scheme minimises heat loss and gain which impacts on the heating requirement, thus lowering energy and carbon footprint.
	3.5.4	CA24	<p>Waste Management Plans for Construction and Demolition Projects</p> <p>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.</p>	This project has been designed in line with best practice principles.
	3.5.5	CA25	<p>Electric Vehicles</p> <p>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</p>	Some 50% of the car parking spaces are provided with EV charging facilities and all other spaces are future proofed to provide EV charging should demand arise.

			amended, which have been updated to include EV vehicle charging point installation.	
	3.5.7	CA29	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.	The scheme will contribute to the green infrastructure of the city by providing open spaces, green roofs and landscaping in lieu of a hard-standing industrial setting.
Chapter 4	4.5.1			
		SC2	City's Character To develop the city's character by: <ul style="list-style-type: none"> • cherishing and enhancing Dublin's renowned streets, civic spaces and squares; • developing a sustainable network of safe, clean, attractive streets, pedestrian routes and large pedestrian zones lanes and cycleways in order to make the city more coherent and navigable and creating further new streets as part of the public realm when the opportunities arise; • protecting the grain, scale and vitality of city streets and encouraging the development of appropriate and sustainable building heights to ensure efficient use of resources, services and public transport infrastructure and that protects the heritage and natural assets of the city; • revitalising the north and south Georgian squares and their environs and realising their residential potential; • upgrading Dame Street/College Green as part of the grand civic spine; • promoting the development of Moore Street and the Parnell Quarter as major new cultural and historical attractions for the city. 	The City's character is cherished, developed, and protected with this proposal. Please see the Architectural & Urban Design Statement for details.
		SC3	Mixed Use Development	The proposal is for a mixed use development with over 30% development area of the site as non-residential use.

			To promote a mixed-use land use policy in the city centre, including the provision of high quality, sustainable residential development, and facilitating the conversion of both old office buildings and over shop spaces to residential.	Please see the Architectural & Urban Design Statement for details.
		SC4	Recreational and Cultural Events To promote and support a variety of recreational and cultural events in the city's civic spaces; as well as the development of new and the retention and enhancement of existing civic and cultural spaces.	Artist's Studios, a gym and outdoor spaces are proposed. Please see the Architectural & Urban Design Statement for details.
		SC5	Urban Design and Architectural Principles To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a climate resilient, quality, compact, well-connected city and to ensure Dublin is a healthy and attractive city to live, work, visit and study in.	The proposal incorporates strong urban design principles for the development including improved public realm along Richmond Road, which creates a more inviting and attractive environment. Please see the Architectural & Urban Design Statement for details.
	4.5.2	SC8	Development of the Inner Suburbs To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport services and enhanced walking and cycling infrastructure.	The zoning of the subject site is Z10 " <i>Inner Suburban and Inner City Sustainable Mixed-Uses</i> ". In this regard, the scheme maximise the opportunity to densify this infill, brownfield, underutilised land in proximity to public transport and walking and cycling infrastructure.
	4.5.3	SC10	Urban Density To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.	The proposed development represents an appropriate density for the area. Please see the Architectural & Urban Design Statement for details. Section 5.0 of this Planning Report and Statement of Consistency provides an analysis of how the subject development accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), (Department of Environment, Heritage

				and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide.
		SC11	<p>Compact Growth In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:</p> <ul style="list-style-type: none"> • enhance the urban form and spatial structure of the city; • be appropriate to their context and respect the established character of the area; • include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents; • be supported by a full range of social and community infrastructure such as schools, shops and recreational areas; • and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. 	The proposed development is compact and of sustainable density on a brownfield site. The site is close to strategic public transport corridors of railway and bus, social and community infrastructure and the development provides services for the surrounding community. Please see the Architectural & Urban Design Statement for details.
		SC12	<p>Housing Mix 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.</p>	The proposed development comprises a mix of one bed, two bed, three person and two bed, four person units. The scheme provides 20% Part V units. Please see the Architectural & Urban Design Statement for details.
		SC13	<p>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.</p>	There is high quality soft landscaping, podium and roof level landscaping and green roofs proposed for the development. The scheme can also provide a connection for residents to the pending Phase 1 development if granted. Please see the Architectural & Urban Design Statement for details.

	4.5.4	SC14	<p>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.</p>	<p>There is a strategic building height strategy for the buildings and massing to integrate with the existing and proposed context and urban form. Please see the Architectural & Urban Design Statement for details. Section 5.0 of this Planning Report and Statement of Consistency also provides a full responses to the relevant SPPRs of the Urban Development and Building Height Guidelines for Planning Authorities (2018).</p>
		SC15	<p>Building Height Uses To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2.</p>	<p>There is a mix of uses including residential, commercial, and community/cultural uses proposed for the site. Please see the Architectural & Urban Design Statement for details.</p>
		SC16	<p>Building Height Locations To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.</p>	<p>The proposed height of the building is stepped and is a maximum of ten storeys. The height is strategically formed to fit within the context and maximise the appropriate density. For example, Block B which is the highest block is stepped down to shoulder height on Richmond Road, and increases towards the rear of the site. Please see the Architectural & Urban Design Statement for details.</p>
		SC17	<p>Building Height To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:</p> <ul style="list-style-type: none"> • 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; 	<p>The proposed height of the building is stepped and is a maximum of ten storeys. The height is strategically formed to fit within the context and maximise the appropriate density. A masterplan and urban design rationale has been included for the site and also to show how proposed Phase 1 and Phase 2 can work in tandem together. Please see the <i>Architectural & Urban Design Statement</i> for details.</p>

			<ul style="list-style-type: none"> • deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; • Do not affect the safety of aircraft operations at Dublin Airport (including cramage); and • have regard to the performance-based criteria set out in Appendix 3. <p>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.</p>	
	4.5.5	SC19	<p>High Quality Architecture</p> <p>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.</p>	The proposed development positively contributes to the city's built environment with high quality architecture. Please see the Architectural & Urban Design Statement for details.
		SC20	<p>Urban Design</p> <p>Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019).</p>	The proposed development follows the principles set out in the Urban Design Manual and the Architectural & Urban Design Statement responds to all the criteria. Section 5.0 of this Planning Report and Statement of Consistency also provides a response to all relevant criteria of the Urban Design Manual. In addition, DBFL Consulting Engineers have prepared a DMURS Compliance Statement which is enclosed separately.
		SC21	<p>Architectural Design</p> <p>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.</p>	The architectural design is contemporary and is resilient to the impacts of climate change. Please see the Architectural & Urban Design Statement for details.

		SC22	<p>Historical Architectural Character</p> <p>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.</p>	The proposed development respects the historic character of the adjacent Distillery Lofts and embraces the history in a contemporary way. See Please see the Architectural & Urban Design Statement for details.
		SC23	<p>Design Statements</p> <p>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.</p>	The submission includes an Architectural and Urban Design Statement, which is enclosed separately.
Chapter 5 - Quality Housing and Sustainable Neighbourhoods	5.5.1			
		QHSN2	<p>National Guidelines</p> <p>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 2019, the Design Manual for Quality Housing (2022), 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.</p>	The proposed development has regard to the DEHLG Guidelines. See design statement for details. Section 5.0-7.0 of this Planning Report and Statement of Consistency also provides responses to the relevant Policy Documents.
	5.5.2	QHSN4	<p>Key Regeneration Areas</p> <p>To promote the transformation of the key regeneration areas into successful socially integrated neighbourhoods and promote area regeneration in parts of the city which</p>	The proposed development will transform this underutilised site. This development has been designed to tie-in with the adjoining SHD scheme if granted permission by An Bord Pleanála, with both schemes

			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.	designed by the same Team. These two developments in tandem will start to see the regeneration of these Z10 zoned lands.
		QHSN5	Community Led Regeneration To ensure that regeneration of estates and communities will be planned with the needs of existing and future residents at the core.	The subject scheme will provide much needed residential units and the creche, retail and gym units will provide additional services for the surrounding community.
		QHSN6	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.	The proposed development supports residential consolidation with an appropriate density and unit sizes on an infill brownfield site. Please see the Architectural & Urban Design Statement for details.
		QHSN10	Urban Density To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.	The proposed development is of appropriate density for the area having regard to the underutilised nature of the existing site in a prime serviced location. Please see the Architectural & Urban Design Statement for details.
	5.5.3	QHSN11	15-Minute City To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.	The proposed development embraces the principles of the 15-minute city with a mix of uses, reduced quantum of parking, healthy placemaking and density. Please see the Architectural & Urban Design Statement for details.
		QHSN12	Neighbourhood Development To encourage neighbourhood development which protects and enhances the quality of our built environment and	The proposed development encourages neighbourhood development and enhances the quality of the built environment with active ground floor and a mix of uses.

			<p>supports public health and community wellbeing. Promote developments which:</p> <ul style="list-style-type: none"> • 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; 	<p>The scheme encourages sustainable and low carbon transport modes and will promote a low traffic neighbourhood. The development compliments materials utilised in the community and will promote sustainable energy efficient materials. The scheme is universally designed and will incorporate a range activities and services for all ages. The scheme has been designed in accordance with the Regional Spatial and Economic Strategy, Sustainable Residential Development in Urban Areas and the Design Manual for Urban Roads and Streets (DMURS). The development provides public realm improvements and all public space will be passively surveilled, ensuring they are safe and secure for all users. Please see the Architectural & Urban Design Statement for details.</p>
--	--	--	--	--

			<ul style="list-style-type: none"> • 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. 	
	5.5.4	QHSN14	<p>High Quality Living Environment</p> <p>To support the entitlement of all members of the community to enjoy a high quality living environment and to support local communities, healthcare authorities and other bodies involved in the provision of facilities for groups with specific design/ planning needs.</p>	The proposed development provides a high quality living environment by providing new open spaces, a creche, a gym, and a retail unit, in addition to residential units.
		QHSN16	<p>Accessible Built Environment</p> <p>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.</p>	The proposed development and outdoor spaces are all universally accessible. Please see the Architectural & Urban Design Statement for details.
		QHSN17	<p>Sustainable Neighbourhoods</p> <p>To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.</p>	The scheme provides a mix of 1 and 2 bedroom units, retail floorspace, a creche, a gym and artist studios, in addition to landscaped open spaces including a children's play area. Therefore, the needs of persons in various stages of their lives have been considered in the proposed mixed-use scheme.
		QHSN21	<p>Gated Residential Development</p> <p>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</p>	The public street and plaza areas are accessible by the public. Please see the Architectural & Urban Design Statement for details.

			and local community and prevent development of sustainable neighbourhoods.	
	5.5.5	QHSN22	<p>Adaptable and Flexible Housing</p> <p>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 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.</p>	The housing units are adaptable and flexible. In this regard, we note that 34 No. larger, universally designed units are provided. Please see the Architectural & Urban Design Statement for details.
		QHSN25	<p>Housing for People with Disabilities</p> <p>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 facilitates equality of 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.</p>	The proposed housing units in the development and outdoor spaces are all universally accessible. Some 34 No. larger, universally designed units are provided. Please see the Architectural & Urban Design Statement for details.
		QHSN011	<p>Universal Design</p> <p>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.</p>	<p>The scheme provides 78 No. oversized units which represents 59% of the overall unit provision. Of these 59% oversized units, some 51% are designed to be universal design (26% of the total units).</p> <p>The proposed development and outdoor spaces are all universally accessible. Please see the Architectural & Urban Design Statement for details.</p>
	5.5.6	QHSN34	<p>Social, Affordable Purchase and Cost Rental Housing</p> <p>To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the</p>	The development will provide 27 No. social housing units (20% of the total units), which is in accordance with Part

			Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH 'Social Housing Strategy 2020' and support the realisation of public housing.	V of the <i>Planning and Development Act 2000</i> (as amended).
	5.5.7	QHSN36	High Quality Apartment Development To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.	The apartments are designed to a high quality with plenty of natural light. Please see the Architectural & Urban Design Statement for details.
		QHSN37	Houses and Apartments To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.	The proposed housing and apartments are a mix of one bed two person, two bed three person and two bed four person units. There is a mix of 20% Part V units. The units range in shapes and sizes. Please see the Architectural & Urban Design Statement for details.
		QHSN38	Housing and Apartment Mix To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.	The proposed apartments are a mix of one bed two person, two bed three person and two bed four person units. There is a mix of 20% Part V units. The units range in shapes and sizes. Please see the Architectural & Urban Design Statement for details.
		QHSN39	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.	A Property Management Strategy Report has been prepared by Aramark and is enclosed separately.

	5.5.8	QHSN47	High Quality Neighbourhood and Community Facilities 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.	Artist studios are proposed with an exhibition space at the front that can be multi-functional and potentially host a programme of events that can be attended by the wider community.
		QHSN48	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.	A Social Infrastructure Audit has been prepared by Thornton O'Connor Town Planning which assesses the provision of community facilities and infrastructure in the vicinity. The site is well served by community facilities and infrastructure and the provision of a creche, gym, retail unit and artist studios will further enhance the available of social infrastructure in the area.
		QHSN49	Phasing To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.	This proposal is Phase 2 and the adjacent Phase 1 site is pending a decision from An Bord Pleanála. It is intended that both schemes would be delivered in one build but in the event that one is refused permission, the other can be constructed and operated separately.
		QHSN50	Inclusive Social and Community Infrastructure To support the development of social and community infrastructure that is inclusive and accessible in its design and provides for needs of persons with disabilities, older people, migrant communities and children and adults with additional needs including the sensory needs of the neurodiverse.	The scheme provides a range of uses which are all universally accessible.
		QHSNO15	Community Safety Strategy That all housing developments over 100 units shall include a community safety strategy for implementation.	A Community Safety Strategy has been prepared and is enclosed as part of the Architectural & Urban Design Statement enclosed.

		QHSN55	<p>Childcare Facilities</p> <p>To facilitate the provision of appropriately designed and sized fit-for-purpose affordable childcare facilities as an integral part of proposals for new residential and mixed-use developments, subject to an analysis of demographic and geographic need undertaken by the applicant in consultation with the Dublin City Council Childcare Committee, in order to ensure that their provision and location is in keeping with areas of population and employment growth.</p>	A creche is proposed at the ground floor of the development.
		QHSN58	<p>Culture in Regeneration</p> <p>To recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development and civic engagement.</p>	The artist studios provided in the scheme will contribute towards achieving this policy.
		QHSN60	<p>Community Facilities</p> <p>To support the development, improvement and provision of a wide range of socially inclusive, multi-functional and diverse community facilities throughout the city where required and to engage with community and corporate stakeholders in the provision of same.</p>	The artist studios provided in the scheme will contribute towards achieving this policy.
Chapter 7 – The City Centre, Urban Villages and Retail	7.5.1			
		CCUV6	<p>Large Scale Retail / Mixed Use Developments</p> <p>To ensure that large scale retail / mixed use development proposals match the capacity of existing and planned public transport; provide good quality street environments to provide safer and more attractive settings for people to shop / do business; and incorporate cycle and pedestrian friendly designs in line with the Retail Design Manual 2012.</p>	The scheme is located proximate to public transport and the development will improve the streetscape along Richmond Road, therefore providing an attractive setting for pedestrians and cyclists.
		CCUV12	<p>Shopfront Design</p> <p>To require a high quality of design and finish for new and replacement shopfront signage and advertising. Dublin City</p>	The active street and shopfront are of a high quality design with stone arches and glazing. Please see the Architectural & Urban Design Statement for details.

			Council will actively promote the principles of good shopfront design as set out in Dublin City Council's Shopfront Design Guidelines and Chapter 15.	
	7.5.2			
		CCUV18	Residential Development To encourage, support and promote more residential apartments as part of mixed-use developments or through the reuse / retrofit of the upper floors of existing buildings. The use of upper floors for residential use is supported in principle on Category 1 and 2 Shopping Streets.	The proposed development is mixed-use, with retail, gym, creche and community / cultural use on the ground floor and residential units over. Please see the Architectural & Urban Design Statement for details.
	7.5.3			
		CCUV22	Intensification To support and promote the redevelopment and intensification of underutilised sites within Key Urban Villages and urban villages including surface car parks.	The proposed development promotes the redevelopment and intensification of an underutilised site. Please see the Architectural & Urban Design Statement for details.
		CCUV23	Active Uses To promote active uses at street level in Key Urban Villages and urban villages and neighbourhood centres.	The proposed development promotes active street front uses due to the provision of a gym, creche, retail unit and artist studios along Richmond Road. See design statement for details.
		CCUV25	Neighbourhood Centres / Local Shopping To support, promote and protect Neighbourhood and Local Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities.	The scheme will provide a creche, gym and retail floorspace, which will serve the local area.
		CCUV26	New Growth Areas To support and facilitate local shopping and retail services commensurate with new residential areas to provide day to day and top up shopping needs.	The retail shop provided in the development will serve the local day-to-day shopping needs of the community.
	7.5.8	CCUV37	Plan Active and Healthy Streets To promote the development of a network of active, healthy, attractive, high quality, green, and safe streets and public spaces which are inviting, pedestrian friendly and easily navigable. The aspiration is to encourage walking as the preferred means of movement between buildings and	The proposed development promotes an active street front and safe public space. Please see the Architectural & Urban Design Statement for details.

			activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.	
		CCUV38	High Quality Streets and Spaces To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender.	The proposed development creates a high quality streetscape that is accessible and inclusive. Please see the Architectural & Urban Design Statement for details.
		CCUV39	Permeable, Legible and Connected Public Realm To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure.	The proposed development creates a permeable and legible public realm that contribute to the key objectives of the <i>Development Plan</i> . Please see the Architectural & Urban Design Statement for details.
		CCUV40	Public Safety To promote the development of a built environment and public spaces which are designed to deter crime and anti-social behaviour and which promote safety, as set out in the 'Your City Your Space' Public Realm Strategy 2012.	The proposed development creates a safe public realm with passive surveillance. Please see the Architectural & Urban Design Statement for details.
		CCUV44	New Development That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility.	The proposed development will deliver a high quality public realm including open space for use by the community and an improved streetscape along Richmond Road. Please see the Architectural & Urban Design Statement for details.
	7.5.9	CCUV45	Advertising Structures To consider appropriately designed and located advertising structures primarily with reference to the zoning objectives and permitted advertising uses and of the outdoor advertising strategy (Appendix 17). In all such cases, the structures must be of high-quality design and materials, and must not obstruct or endanger road users or	The scheme signage will be agreed through compliance or will be subject to a future planning application once permission has been granted for the mixed-use development.

			pedestrians, nor impede free pedestrian movement and accessibility of the footpath or roadway.	
Chapter 8 – Sustainable Movement and Transport	8.5.1	SMT1	<p>Modal Shift and Compact Growth</p> <p>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.</p>	Whilst not directly applicable, the proposed development complies with the overriding principles particularly in regard to the promotion of active mobility (new infrastructure provision and secure on-site parking opportunities), appropriate density in terms of the sites excellent accessibility levels, in parallel with discouraging private car use by restricting car parking provision as an integral demand management initiative.
		SMT2	<p>Decarbonising Transport</p> <p>To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.</p>	The proposed development complies with the overriding principles through the provision of the required number of EV charge points on-site for residents and car share vehicles.
		SMT01	<p>Transition to More Sustainable Travel Modes</p> <p>To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the development plan, in line with the city mode share targets of 26% walking/cycling/micro mobility; 57% public transport (bus/rail/Luas); and 17% private (car/van/HGV/motorcycle).</p>	The proposed development complies with the overriding principles particularly in regard to the promotion of sustainable transport whilst discouraging private car use. The proposed developments predicted modal split, as detailed in the TTA and MMP reports is comparable if not even an improvement upon the city mode share targets.
	8.5.2			
		SMT4	<p>Integration of Public Transport Services and Development</p> <p>To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places.</p>	The proposed development complies in regard to the intensification and mixed use nature of the scheme proposals in an area and currently benefits from good bus and rail accessibility levels with emerging proposals to further enhance the attractiveness of public transport.
		SMT6	<p>Mobility Management and Travel Planning</p> <p>To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting</p>	A Mobility Management Plan has been compiled and accompanies the planning documentation.

			and providing for active travel and public transport use while managing vehicular traffic and servicing activity.	
		SMT7	Travel Plans for New and Existing Developments To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.	A Mobility Management Plan has been compiled and accompanies the planning documentation.
	8.5.3	SMT8	Public Realm Enhancements To support public realm enhancements that contribute to place making and liveability and which prioritise pedestrians in accordance with Dublin City Council's Public Realm Strategy ('Your City – Your Space'), the Public Realm Masterplan for the City Core (The Heart of the City), the Grafton Street Quarter Public Realm Plan and forthcoming public realm plans such as those for the Parnell Square Cultural Quarter Development and the City Markets Area.	The proposed infrastructure enhancements along the entire site frontage of the subject site represent a significant improvement to the public street corridor with landscaping proposals complementing the improved pedestrian and cycle routes along Richmond Road.
		SMT9	Public Realm in New Developments To encourage and facilitate the co-ordinated delivery of high quality public realm in tandem with new developments throughout the city in collaboration with private developers and all service/utility providers, through the Development Management process.	The proposals include the implementation of a new public accessible plaza between Block A and Block B/C. Further details of this new plaza are detailed in the landscape architect's documentation.
	8.5.4	SMT11	Pedestrian Network To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.	The infrastructure enhancements along the entire site frontage of the subject site represent a significant improvement to the public street corridor with landscaping proposals complementing the improved pedestrian and cycle routes along Richmond Road.
		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,	The infrastructure enhancements along the entire site frontage of the subject site represent a significant improvement to the public street corridor with the improved pedestrian and cycle routes along Richmond Road. The design of these infrastructure improvements

			street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.	has noted this policy and incorporated the recommended measures in the appropriate areas.
	8.5.5	SMT12	Pedestrians and Public Realm To enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm to provide a safe and comfortable street environment for pedestrians of all ages and abilities.	The infrastructure enhancements along the entire site frontage of the subject site that are to be implemented by the applicant represent a significant improvement to the public street corridor with new and improved pedestrian and cycle routes along Richmond Road offering a safe and comfortable street environment.
		SMT13	Urban Villages and the 15-Minute City To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and facilitating the delivery of public transport infrastructure and services, and public realm enhancement.	Not directly applicable to the proposed development however the proposals include an active travel connection for residents to walk / cycle via a dedicated connection into the adjoining Phase 1 site which in turn offers a convenient route to the emerging Tolka River greenway corridor.
		SMT14	City Centre Road Space To manage city centre road-space to best address the needs of pedestrians and cyclists, public transport, shared modes and the private car, in particular, where there are intersections between DART, Luas and Metrolink and with the existing and proposed bus network.	Not directly applicable to the proposed development however the infrastructure enhancements along the entire site frontage of the subject site represent a significant improvement to the public street corridor with landscaping proposals complementing the improved pedestrian and cycle routes along Richmond Road.
	8.5.6	SMT16	Walking, Cycling and Active Travel To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.	The infrastructure enhancements along the entire site frontage of the subject site represent a significant improvement to the public street corridor with new and improved pedestrian and cycle routes along Richmond Road offering a safe and comfortable street environment. Furthermore the accommodation of an appropriate quantum of high quality, conveniently located, secure and weather protected bicycle parking will facilitate the uptake of cycling.
		SMT18	The Pedestrian Environment To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes	The infrastructure enhancements along the entire site frontage of the subject site that are to be implemented by the applicant as part of the subject redevelopment proposals represent a significant improvement to the

			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.	public street corridor with new and improved pedestrian and cycle routes along Richmond Road offering a safe and comfortable street environment.
		SMT08	Cycling Infrastructure and Routes To improve existing cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages, and to create protected cycle lanes, where feasible. Routes within the network will be planned in conjunction with green infrastructure objectives and the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policies GI2, GI6 and GI8 and objective GI02.	The infrastructure enhancements along the entire site frontage of the subject site that are to be implemented by the applicant as part of the subject redevelopment proposals represent a significant improvement to the public street corridor with new and improved pedestrian and cycle routes along Richmond Road offering a safe and comfortable street environment.
		SMT09	Greater Dublin Area Cycle Network Plan To support the development of a connected cycling network in the City through the implementation of the NTA's Greater Dublin Area Cycle Network Plan, subject to environmental assessment and route feasibility.	The infrastructure enhancements along the entire site frontage of the subject site include the delivery of new segregated cycle routes which is in keeping with Richmond Road being classified as a 'Secondary' route in the GDA cycle network.
		SMT010	Walking and Cycling Audits Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken.	A Quality Audit has been undertaken and accompanies the proposed development. In accordance with DMURS, this Quality Audit includes a Walking and Cycling Audit of the environs of the development.
		SMT012	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.	Not directly applicable to the proposed development however the proposals include the provision of short term cycle parking spaces in convenient and highly accessible locations, specifically for visitors calling at any of the developments residential or non-residential units.
		SMT014	Cycle Parking Facilities To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density	Not directly applicable to the proposed development however the proposals include the provision of high quality short and long term bicycle parking in

			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.	accordance with the appropriate development management standards.
		SMT24	Shared Mobility and Adaptive Infrastructure To promote the use and expansion of shared mobility to all areas of the city and facilitate adaptive infrastructure for the changing modal transport environment, including other micro-mobility and shared mobility, as part of an integrated transport network in the city, and to support and promote smart growth initiatives that develop new solutions to existing and future mobility services and support Smart Dublin in the development of a Mobility as a Service (MaaS) platform.	Not directly applicable to the proposed development however the proposals include the provision of dedicated electric scooter parking and charging facilities.
	8.5.7			
		SMT26	Commuter, Shopping, Business and Leisure Parking To discourage commuter parking and to ensure adequate but not excessive parking provision for short-term shopping, business and leisure uses.	The proposals comply with this policy in that no on-site commuter (staff) car parking is being assigned to the proposed developments retail and gym units or the artist studios, whilst 1 No. space is being provided for the proposed creche staff.
		SMT27	Car Parking in Residential and Mixed Use Developments (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking. (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. (iii) To safeguard the residential parking component in mixed-use developments.	The proposals comply with this policy in that no on-site commuter (staff) car parking is being assigned to the proposed developments retail and gym units or the artist studios, whilst 1 No. space is being provided for the proposed creche staff. The 133 No. residential units will be provided with 24 No. car parking spaces, which is a ratio of 0.18 No. spaces per unit. These spaces include 3 No. car share spaces which will reduce the need for residents to own a private car.
		SMT29	Expansion of the EV Charging Network To support the expansion of the EV charging network by increasing the provision of designated charging facilities for	It is noted that 50% of all on-site car parking spaces will benefit from being fitted with EV charge points as per DCC development management standards.

			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.	
	8.5.8			
		SMT027	<p>Road, Street and Bridge Schemes</p> <p>To initiate and/or implement the following street/road schemes and bridges within the six year period of the development plan, subject to the availability of funding and environmental requirements and compliance with the 'Principles of Road Development' set out in the NTA Greater Dublin Area Transport Strategy.</p> <p>Roads and Streets</p> <ul style="list-style-type: none"> • River Road - Map A • Belmayne Main Street - Map C • Sean Moore Road - Map F • Cherry Orchard Link Roads - Map D • Richmond Road Map - E • Collins Avenue Extension - Map B • Blackhorse Avenue - Map D • Clonshaugh Road Industrial Estate - Map B • Cappagh Road - Map A • St. Margaret's Link Road - Map B • Northern Cross/Belcamp Lane - Map B • Santry Avenue Link Road - Map B • Newtown Avenue - Map B <p>Bridges</p> <ul style="list-style-type: none"> • Dodder Public Transport Bridge, linked with BusConnects 16 proposals - Map E. • Bridge from North Wall Quay at Point Depot (Point Bridge) and the widening of Tom Clarke Bridge, improve pedestrian and cycling facilities at the crossing point as well as accommodating 	The proposed development includes roadworks along Richmond Road including road widening works, footpath widening and provision of a cycle track/lane in each direction. The applicant is happy to liaise with Dublin City Council in order to deliver the Richmond Road scheme.

			<p>additional public transport routes in conjunction with the Dodder Bridge -Map E.</p> <ul style="list-style-type: none"> • Pedestrian/cycle bridge crossing the Liffey between the Samuel Beckett Bridge and the Tom Clarke Bridge - Map E. • Liffey Valley Park pedestrian/cycle bridge - Map E. • Pedestrian/Cycle Bridge across River Liffey from Irish National War Memorial Gardens/Islandbridge to the Chapelizod Road, Islandbridge - Map D. • Cycle/pedestrian bridges that emerge as part of the evolving Strategic Cycle Network and Strategic Green Infrastructure Network. • Broadstone to Grand Canal pedestrian/cycle bridge - Map E. 	
	8.5.9	SMT33	<p>Design Manual for Urban Roads and Streets</p> <p>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.</p>	DBFL Consulting Engineers have confirmed that the design of the proposed off-site infrastructure enhancement works to be implemented by the Applicant on Richmond Road comply fully with the guidance detailed in DMURS.
		SMT34	<p>Street and Road Design</p> <p>To ensure that streets and roads within the city are designed to balance the needs and protect the safety of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport whilst ensuring the needs of commercial servicing is accommodated.</p>	The subject scheme including road widening works and provision of pedestrian and cyclist infrastructure will accord with this policy. The development prioritises active travel and public transport and facilitate commercial servicing.
		SMT036	<p>Environmental and Road Safety Impacts of Traffic in the City</p> <p>To tackle the adverse environmental and road safety impacts of traffic in the city through measures such as:</p>	Whilst not directly applicable to the proposed development it is noted that a Quality Audit, incorporating a Stage 1 Road Safety Audit, has been undertaken on the proposed development to ensure that all road safety implications are fully addressed at

			<ul style="list-style-type: none"> • The implementation of traffic calming measures and filtered permeability including the restriction of rat-runs in appropriate areas in accordance with best practice and following advice contained in the Design Manual for Urban Roads and Streets (DMURS). • To undertake a study, assessing and identifying areas adjacent to proposed sustainable transport projects for traffic calming and filter permeability. • The ongoing monitoring of traffic noise and emissions, and the assessment and evaluation of the air quality and traffic noise impacts of transport policy and traffic management measures being implemented by Dublin City Council. • To support programmes of action which tackle the issue of road safety in the city. • To promote traffic calming in existing residential neighbourhoods through innovative street design and layout such as homezones, filtered permeability, low traffic neighbourhoods, quietways and unsignalised crossings where appropriate. 	planning design stage. This ensures that a safe street environment is being implemented / delivered by the proposed developments design.
Chapter 9 - Sustainable Environmental Infrastructure and Flood Risk	9.5.1			
		SI2	<p>Integrating Water Services with Development</p> <p>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.</p>	Irish Water Confirmation of Feasibility received. Please refer to Appendix E of the Infrastructure Design Report by DBFL Consulting Engineers.

		SI3	Separation of Foul and Surface Water Drainage Systems To require all new development to provide separate foul and surface water drainage systems.	The proposed development has separate foul and surface water drainage systems.
		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).	The proposed development's sewers are designed to comply with the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification – refer to DBFL Infrastructure Design Report and drawings.
		SI5	Safeguarding of Public Water Services Infrastructure To work in conjunction with Irish Water to safeguard existing water and drainage infrastructure by protecting existing wayleaves and buffer zones around public water service infrastructure.	Existing wayleaves / buffer zones are not impacted.
		SI6	Water Conservation To require all developments to incorporate best practice water conservation and demand management measures in order to promote water conservation by all water users, and minimise the pressure for water drawdown, wastage of water supply and reduced availability of water resources.	The scheme will incorporate best practice water conservation and demand management measures such as fitting all hot water taps with flow regulators to allow for the conservation of water usage (as well as energy used to heat hot water). In addition, the hot water taps (including shower head fittings) will be fitted with intelligent water flow regulators to allow for conservation of water usage (as well as energy used to heat hot water).
	9.5.3	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, the piped water system, and potential climate change impacts.	The proposed development provides fluvial flood protection measures.
		SI14	Strategic Flood Risk Assessment To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific	The proposed development complies with the SFRA recommendations and Flood Risk Management Guidelines and Justification Test including flood risk and climate change mitigation measures. Please refer to Site Specific Flood Risk Assessment report prepared by DBFL Consulting Engineers.

			Flood Risk Assessment) of the Justification Tests, and to have regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.	
		Sl15	<p>Site-Specific Flood Risk Assessment</p> <p>All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> • The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 and any future amendments, and the Strategic Flood Risk Assessment (SFRA) as prepared by this development plan. • The application of the sequential approach, with avoidance of highly and less vulnerable development in areas at risk of flooding as a priority and/ or the provision of water compatible development only. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change and those associated with existing flood defences. The SSFRA will include site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the 	A Site Specific Flood Risk Assessment has been undertaken – refer to separate report prepared by DBFL Consulting Engineers.

			<p>public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. Allowances for climate change shall be included in the SSFRA.</p> <ul style="list-style-type: none"> On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at significant risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management Guidelines 2009) on the portion at significant risk of flooding. There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding which do not have existing development on them. 	
		SI18	<p>Protection of Flood Alleviation Infrastructure</p> <p>To put in place adequate measures to protect the integrity of flood alleviation infrastructure in Dublin City and to ensure new developments or temporary removal of any flood alleviation asset does not increase flood risk, while ensuring that new flood alleviation infrastructure has due regard to nature conservation, natural assets, open space and amenity values, as well as potential climate change impacts.</p>	Flood alleviation measures for development are detailed in the Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers.
		SI19	<p>Provision and Upgrading of Flood Alleviation Assets</p> <p>To facilitate the provision of new, or the upgrading of existing, flood alleviation assets where necessary and in particular, the implementation of proposed flood alleviation schemes, on the Santry, Camac, Dodder, Wad, Naniken, Mayne, Tolka and Poddle rivers as well as Clontarf</p>	Flood alleviation measures for development are detailed in the Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers.

			Promenade, Sandymount/ Promenade (northwards towards Irishtown Nature Park subject to the outcome of a flood/ environmental study), Liffey estuary and any other significant flood risk areas being progressed through the planning process to completion during the lifetime of the 2022-2028 Dublin City Development Plan, with due regard to the protection of natural heritage, built heritage and visual amenities, as well as potential climate change impacts.	
		SI20	Basement Flood Risk Management That there is a general presumption against the development of basements for residential use below the estimated flood levels for Flood Zones A or B (see Section 15.18.4 and Appendix 9 for further guidance).	No basement proposed in the development
		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, 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.	SuDS drainage systems incorporated into the Development. Please refer to DBFL Consulting Engineers Infrastructure Design Report and relevant drawings.
	9.5.4	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	SuDS drainage systems and Nature-based Solutions incorporated into the Development. Please refer to DBFL Consulting Engineers Infrastructure Design Report and relevant drawings.

			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 & 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.	
		Sl23	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 & Blue Roof Guide (2021) which is summarised in Appendix 11.	Green / Blue Roofs provided for the development. Please refer to DBFL Consulting Engineers Infrastructure Design Report and relevant drawings.
		Sl25	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.	A Surface Water Management Plan for the development is incorporated into the Infrastructure Design Report by DBFL Consulting Engineers.
		Sl26	Taking in Charge of Private Drainage Infrastructure To require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be designed to taking in charge standards).	Public Road drainage and connections for the development proposals are to the standards in the Greater Dublin Regional Code of Practice for Drainage Works. Private building drainage is detailed on DBFL Consulting Engineers relevant drawings.
	9-5-5	Sl27	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	The various waste reports prepared by Awn Consulting have been prepared with due consideration of best practice standards.

			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).	
		Sl28	<p>Sustainable Waste Management</p> <p>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.</p>	<p>The various waste reports prepared by AWN Consulting have been prepared with due consideration of best practice standards. For example, the Operational Waste Management Plan notes:</p> <p><i>"This OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The OWMP also seeks to provide guidance on the appropriate collection and transport of waste to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil or water resources)."</i></p>
		Sl29	<p>Segregated Storage and Collection of Waste Streams</p> <p>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).</p>	<p>There are various waste storage areas provided throughout the development at ground floor levels of Blocks A, B and C. These storage areas will be provided with various types of separate waste and recycling streams.</p>
		Sl30	<p>Waste Management in Apartment Schemes</p> <p>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 2020 (or and any future updated versions of these guidelines produced during the lifetime of this plan).</p>	<p>The various waste reports prepared by AWN Consulting have been prepared with due consideration of best practice standards and all relevant guidance documents, including the <i>Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2022</i>.</p>

		SIO16	Eastern-Midlands Region Waste Management Plan To support the implementation of the Eastern Midlands Regional Waste Management Plan 2015–2021 and any subsequent plans in order to facilitate the transition from a waste management economy towards a circular economy.	The Operational Waste Management Plan prepared by AWN Consulting has been prepared in accordance with current legal and industry standards including Eastern Midlands Regional Waste Management Plan 2015–2021.
	9.5.8			
		SI37	Noise Sensitive Development To give careful consideration to the location, design and construction of noise-sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources, where practical, and to minimise the potential for noise disturbance.	A Noise Assessment has been prepared by AWN Consulting and is enclosed separately. This report demonstrates that the scheme has been comprehensively considered from a noise perspective having regard to the additional measures that are proposed for certain façades in the scheme including an enhanced glazing system and enhanced ventilation systems.
		SI38	Noise Sensitive Development To ensure that new residential development close to approved commercial uses is suitably sound insulated (for further guidance, see Sections 15.14 and 15.18.9).	The Noise Assessment by AWN Consulting include measures to mitigate noise from areas such as the gym and retail unit.
	9.5.9	SI41	Lighting Standards To provide and maintain high quality and appropriate street/ outdoor lighting on public roads, footways, cycleways, public realm throughout the City in accordance with the Council's Vision Statement for Public Lighting in Dublin City and related public lighting projects. In general, the lighting of roads and public amenity areas shall be provided in accordance with the requirements of the latest Public Lighting Standards IS EN13201 and further updates.	The lighting complies with DCC requirements including compliance with Public Lighting Standards IS EN13201. Any lighting to be taken in charge will be compliant with DCC standard approved fittings.
		SI42	Light Pollution To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.	Lighting has been designed and selected to ensure light spillage has been minimised.

		SI43	<p>Energy Efficient Lighting</p> <p>To require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.</p>	All lighting will be energy efficient with photocell or timeclocks to reduce energy waste in meeting the sustainable targets of the development.
		SI48	<p>Sharing and Co-Location of Digital Connectivity Infrastructure</p> <p>To support the appropriate use of existing assets such as lighting, traffic poles and street furniture for the deployment of telecoms equipment and to encourage the sharing and co-location of digital connectivity infrastructure (including small cells, access points, communications masts and antennae) in order to avoid spatially uncoordinated and duplicitous provision that makes inefficient use of city space and negatively impacts on visual amenity and built heritage.</p>	The proposed development fully encourages co-location and sharing of digital connectivity infrastructure such as antennae on existing support structures, masts and tall buildings.
	9.5.12			
		SI50	<p>Undergrounding of Energy Utility Infrastructure</p> <p>To require that the location of local energy services such as electricity, telephone and television cables be underground wherever possible, and to promote the undergrounding of existing overhead cable and associated equipment, where appropriate, in the interests of visual amenity and facilitating compact urban development.</p>	Development utilities are designed to be underground.
Chapter 10 -Green Infrastructure and Recreation	10.5.1	GI1	<p>Green Infrastructure Assets</p> <p>To identify and protect the integrity of the city's GI assets, as appropriate, and to enhance and expand the connectivity, multi-functionality, and accessibility of the city's green infrastructure network, while addressing gaps in the network.</p>	The proposed development will enhance the green infrastructure of the city, by replacing the hard-standing nature of the existing site and providing a development which includes open spaces and green roofs.
		GI2	<p>Connectivity</p> <p>To develop an interconnected green infrastructure network of strategic natural and semi-natural areas with other</p>	The proposed development will contribute to providing an interconnect green infrastructure network in the city by replacing the hard-standing nature of the existing site

			environmental features including green spaces, rivers, canals, the coastal and marine area and other physical features including streets and civic spaces that supports ecological, wildlife, and social connectivity.	and providing a development which includes open spaces and green roofs.
		GI3	Multi-functionality (GI) 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 multi-functionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.	The proposed development will replace hard-standing with a variety of planting and habitat typologies, at both ground, podium and fifth floor level, as well as green roofing. These areas will provide leisure and amenity space to residents and locals, as well as areas managed for biodiversity e.g., pollinators, birds and bats; through the increase in vegetation proposed at the site and the various types of same proposed.
		GI4	Accessibility To ensure universal design for access for all to the green infrastructure network. Priority of access is to be given to pedestrians over all other users. In line with the Parks Strategy, access to facilities and to public parks and open spaces will be provided equally to all citizens and inequalities of access shall be identified and addressed.	Please see enclosed a Universal Access Statement prepared by O'Herlihy Access Consultancy, which notes that all landscaped areas are universally accessible.
		GI5	Greening of Public Realm / Streets To integrate urban greening features including nature based solutions into the existing public realm where feasible and into the design of public realm projects for civic spaces and streets. The installation of living green walls will be encouraged to the fullest possible extent throughout the city of Dublin and tree pits with mixed planting will be preferred for the greening of streets in recognition of the co-benefits they offer for SuDs, biodiversity, amenity value and traffic calming.	SuDs and nature based solutions have been incorporated into the project design via the increased provision of roof gardens and planted areas at ground, podium and fifth floor, as well as the provision of green roofs.
		GI6	New Development / New Growth Areas To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth	The proposed development will replace hard-standing with green infrastructure in the form of a variety of planting and habitat typologies, at both ground, podium

			areas in the city that contributes to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development.	and fifth floor level, as well as green roofing. These areas of vegetation will contribute to the overall ecosystem services provision in this built-up urban area; through storm water control and management and pollinator resource provision.
		Gl7	Connecting Greening Elements in Site Design To avoid the fragmentation of green spaces in site design and to link green spaces /greening elements to existing adjacent green infrastructure / the public realm where feasible and to provide for ecological functions.	The site is currently hard-standing and contains no green spaces. The proposed development will replace this with a variety of areas of green spaces and will link these up with the adjoining phase 1 lands and the River Tolka corridor.
		GIO1	Green Roof Guidance Document (2021) The use of green / blue roofs in developments will be in accordance with the requirements of the Dublin City Council Green and Blue Roof Guide Document (2021), see Appendix 11.	In this development, both intensive and extensive green roofs are provided. The green roofs maximize biodiversity through the use of good pollinator plants and native trees. The green roofs will also provide for additional amenities and communal open space without affecting stores capacity or drainage function of the green roofs.
	10.5.2	Gl9	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).	An Appropriate Assessment Screening and Natura Impact Statement have been prepared for the proposed development. These reports have identified any potential sources of adverse effects to EU sites as a result of the proposed development and detail any mitigation measures that will be required to address same. Once these mitigation measures are followed in full, there will be no likely significant effects on any EU sites as a result of the proposed development.
		Gl10	Flora and Fauna Protected under National and European Legislation Located Outside Designated Areas To adequately protect flora and fauna (under the EU Habitats and Birds Directives), the Wildlife Acts 1976 (as amended), the Fisheries Acts 1959 (as amended) and the Flora (Protection) Order 2022 S.I No. 235 of 2022, wherever they occur within Dublin City, or have been identified as	An Ecological Impact Assessment (EcIA) Report has been prepared for the proposed development. This assessment included consideration of potential impacts to species such as birds, bats, flora and other fauna and was informed by specialist surveys where applicable. Mitigation and enhancement measures have been recommended and detailed within the EcIA to address any potential impacts and enhance the biodiversity of

			supporting the favourable conservation condition of any European sites.	<p>the site compared to its current condition. Once these mitigation measures are followed in full, there will be no likely significant effects on any protected flora and fauna as a result of the proposed development.</p> <p>A Biodiversity Enhancement Plan (BEP) has also been prepared detailing how the proposed development will incorporate and support biodiversity into the future.</p>
		Gl11	<p>Proposed Natural Heritage Areas</p> <p>To protect and enhance the ecological functions and connectivity of habitats and species of proposed Natural Heritage Areas (pNHAs) to be designated by the National Parks and Wildlife Service (NPWS).</p>	<p>An EclA has been prepared for the proposed development application. This assessment included consideration of potential impacts to designated sites. Where any potential sources of adverse effects to same as a result of the proposed development were identified, the EclA details the mitigation measures that will be required to address them. Once these mitigation measures are followed in full, there will be no likely significant effects on any designated sites as a result of the proposed development.</p>
		Gl12	<p>National and International Sites for Nature Conservation</p> <p>To protect sites for nature conservation as designated under the Ramsar Treaty for wetland sites, National Special Amenity Areas, National Nature Reserves, Important Bird Areas and Flora Protection Order Sites.</p>	<p>An EclA has been prepared for the proposed development application. This assessment included consideration of potential impacts to designated sites. Where any potential sources of adverse effects to same as a result of the proposed development were identified, the EclA details the mitigation measures that will be required to address them. Once these mitigation measures are followed in full, there will be no likely significant effects on any designated sites as a result of the proposed development.</p>
		Gl13	<p>Areas of Ecological Importance for Protected Species</p> <p>To ensure the protection, conservation and enhancement of all areas of ecological importance for protected species, and especially those listed in the EU Birds and Habitats Directives, including those identified as supporting the favourable conservation condition of any European sites, in</p>	<p>An EclA has been prepared for the proposed development application. This assessment included consideration of potential impacts to designated sites. Where any potential sources of adverse effects to same as a result of the proposed development were identified, the EclA details the mitigation measures that will be</p>

			accordance with development standards set out in this plan.	required to address them. Once these mitigation measures are followed in full, there will be no likely significant effects on any designated sites as a result of the proposed development.
		Gl14	<p>Ecological / Wildlife Corridors</p> <p>To maintain and strengthen the integrity of the city's ecological corridors and stepping stones which enable species to move through the city, by increasing their connectivity [to be shown in the proposed Green Infrastructure Strategy] under Article 10 of the EU Habitats Directive. Development proposals should not compromise their ecological functions and should realise opportunities to contribute to enhancing the nature conservation value of them by landscaping that provides complementary habitats. An Ecological Impact Assessment will be required for any proposed development likely to have a significant impact on habitats and species of interest on or adjacent an ecological corridor.</p>	<p>An EclA has been prepared for the proposed development application. This assessment included consideration of potential impacts to designated sites, flora, fauna and areas of importance to wildlife and nearby ecological corridors.</p> <p>The site is located in proximity to the River Tolka and in its current condition (entirely built-land) it contributes little to this ecological corridor and the species that might use it. The proposed development increases the over all green space at the site through areas of tree cover, shrub and planting. This will contribute to the overall provision of green infrastructure along Richmond Road and the built-up areas along the River Tolka ecological corridor.</p>
		Gl15	<p>Inland and Sea Fisheries</p> <p>To protect inland and sea fisheries and take full account of Inland Fisheries Ireland Guidelines 'Planning for Watercourses in the Urban Environment' 2020, when undertaking, approving or authorising development or works which may impact on rivers, streams, watercourses, estuaries, shorelines and their associated habitats. To protect sea angling sites designated by Inland Fisheries Ireland at the North and South Bull Walls and at Dollymount and Sandymount Strands.</p>	<p>The proposed development is not located along any waterbody, but is located c.50m from the River Tolka. The EclA and NIS contain measures to ensure no impacts to same occur as a result of the proposed development.</p>
		Gl16	<p>Habitat Creation and New Development</p> <p>That new developments (as appropriate) will be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of</p>	<p>Swift nesting blocks (20 No.) and bat boxes (4 No.) have been incorporated into the elevations of the proposed development.</p>

			nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.	A Biodiversity Enhancement Plan (BEP) has been prepared for the proposed development and details how it will support local biodiversity into the future.
		Gl17	Habitat Restoration To increase the percentage of restored and naturalised areas on public land in the city. That new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-term maintenance to limit degradation.	A Biodiversity Enhancement Plan (BEP) has been prepared for the proposed development and details how it will support local biodiversity into the future. The proposed development's landscaping provides for increase tree, shrub and other planting to replace the existing hard-standing that covers the site. This will replace brownfield with areas of green space and represents an overall improvement for habitat provision/restoration at the site.
		Gl18	Minimise Impact – Light and Noise To minimise the environmental impact of external lighting and noise at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection of sensitive species such as bats (see also Section 9.5.9 Public & External Lighting).	Bat friendly lighting has been incorporated into the design as detailed in the EclA.
		GIO7	National Biodiversity Action Plan 2017-2021 To support the management targets for nature conservation sites set out in the National Biodiversity Action Plan 2017 (and as updated) and the objectives for local authorities to address threats to biodiversity.	The proposed development will represent an overall increase in the provision and support of biodiversity at the site and will not impact on any designated sites.
		GIO8	Dublin City Biodiversity Action Plan 2021 - 2025 To support the implementation of the 'Dublin City Biodiversity Action Plan 2021–2025' (or as updated), which sets out key themes and objectives for biodiversity	The proposed development will represent an overall increase in the provision and support of biodiversity at the site.

			conservation and restoration and measurable targets and actions, in partnership with all relevant stakeholders.	
		GIO9	Invasive Alien Species To support measures to prevent the introduction of and to control the spread of invasive alien species in Dublin City in accordance with the European Communities (Birds and Natural Habitats) Regulations 2011 and EU Regulations 1143/2014 and to implement the targets and actions set out in the Dublin City Invasive Alien Species Action Plan 2016 – 2020 (or as updated).	The site of the proposed development contains no high-level impact invasive alien species (see EclA for details).
		GIO10	All Ireland Pollinator Plan 2021 - 2025 To have regard to the all-Ireland Pollinator Plan 2021 – 2025 in the management of the Council's open spaces, parks and roadside verges and to encourage the pollination of vacant, derelict and temporary sites through measures to protect and increase the populations of native wild bees and other pollinators.	The All-Ireland Pollinator Plan 2021 – 2025 has been considered in the landscaping proposed for the site and in the Biodiversity Enhancement Plan.
		GIO13	Dublin City Habitat Map and Database To protect and improve connectivity of habitats and to prevent habitat loss and fragmentation through urban land use change, development and management through the use of the Dublin City Habitat Map and Database (2020, and updates) to inform planning decisions.	The proposed development will represent and overall increase in the provision and support of habitats and biodiversity at the site.
	10.5.3	GI19	Protect and Enhance Landscapes To continue to protect and enhance the city's landscape and seascape, the amenities of places and features of natural beauty and interest, through sustainable planning and design for both the existing community and for future generations in accordance with the National Landscape Strategy 2015 – 2025 and any updated strategy.	The proposed development will represent and overall increase in the provision and support of biodiversity at the site.
		GI20	Views and Prospects To protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage.	A Landscape and Visual Impact Assessment has been prepared by Mitchell + Associates.

	10.5.4	Gl24	<p>Multi-Functionality (GI)</p> <p>To incorporate new open space into the green infrastructure network for the city, and providing a multi-functional role including: outdoor recreation, biodiversity, urban drainage, flood management, connection and carbon absorption without compromising public access to and the amenity function of open space (see Section 15.6: Green Infrastructure and Landscaping).</p>	<p>The proposed development will replace hard-standing with a variety of planting and habitat typologies, at ground, podium and fifth floor level, as well as green roofing.</p> <p>These areas will provide leisure and amenity space to residents and locals, as well as areas managed for biodiversity e.g., pollinators, birds and bats; through the increase in vegetation proposed at the Site and the various types of same proposed.</p>
		Gl25	<p>Open Space Provision (sq. m.) per 1,000 Persons Benchmark</p> <p>To ensure equality of access for all citizens to the public parks and open spaces in Dublin City and to promote more open space with increased accessibility and passive surveillance where feasible. In this regard, a city wide range of 2.5ha to 3.6ha of parks per 1,000 population benchmark for green/recreational space as set out in the 2019 Parks Strategy (or as updated) shall be a policy goal and quality standard.</p>	<p>Please see enclosed a Universal Access Statement prepared by O’Herlihy Access Consultancy, which notes that all landscaped areas are universally accessible.</p>
		Gl28	<p>New Residential Development</p> <p>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.</p>	<p>The scheme includes open spaces including children’s play space and all spaces are easily accessible.</p>
	10.5.7	Gl40	<p>Tree Planting - General</p> <p>To require appropriate and long-term tree and native hedgerow planting in the planning of new development, urban spaces, streets, roads and infrastructure projects. New development should seek to provide for additional tree planting using a diversity of species including native species as appropriate to the location of the development</p>	<p>The proposed design increases the tree cover at the site compared to existing situation.</p>

			in the interests of natural heritage, amenity, environmental quality and climate resilience.	
		Gl41	Protect Existing Trees as Part of New Development To protect existing trees as part of new development, particularly those that are of visual, biodiversity or amenity quality and significance. There will be a presumption in favour of retaining and safeguarding trees that make a valuable contribution to the environment.	There are no trees on the developable site and there are 2 No. trees located within the application red line, within Dublin City Council's ownership. Both trees will be removed to facilitate the road improvement works required by Dublin City Council.
	10.5.8	Gl45	National Physical Activity Plan 2016 To improve the health and well-being of communities by increasing access to participation in sports, recreation and healthy activity in line with the National Physical Activity Plan 2016, the Healthy Ireland Framework 2019 – 2025 and the Sport Ireland Participation Plan 2021 – 2024.	The proposed development includes a variety of open spaces which will contribute towards improving the health and well-being of the community.
		Gl52	Children's Playing facilities in New Residential and Mixed 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.	Children's playspace is provided for the residents on the communal podium.
Chapter 11 – Built Heritage and Archaeology				
Chapter 12 – Culture	12.5	CU1	Shared Vision for Culture To lead and support the development of a shared vision for culture in the city in collaboration with cultural institutions and other cultural bodies in recognition of their key role and contribution to the cultural life of the city.	The proposed development includes artist's studios. The Applicant and Design Team have been working with the Richmond Road Studios to provide appropriate artist space that suits their needs as they have been searching for a new location since they received notice of their eviction from existing premises on Richmond Road in 2022.
		CU2	Cultural Infrastructure	The artist studios provided in the scheme will contribute towards achieving this policy.

			To ensure the continued development of Dublin as a culturally vibrant, creative and diverse city with a broad range of cultural activities provided throughout the city, underpinned by quality cultural infrastructure.	
	12.5.1	CU4	<p>Cultural Resources</p> <p>To support the development of new and expanded cultural resources and facilities within the city that enrich the lives of citizens and visitors, provide new opportunities for engagement and celebrate aspects of our history and culture.</p>	The artist studios provided in the scheme will contribute towards achieving this policy.
	12.5.2	CU7	<p>Cultural Clusters and Hubs</p> <p>To support existing, and encourage the growth of, emerging cultural clusters and hubs within the city, which bring together cultural activities interlinked with supporting uses (such as restaurants, retail, galleries and venues) to create vibrant, defined cultural quarters and communities within the city that give a variety of cultural experiences to all.</p>	The artist studios provided in the scheme will contribute towards achieving this policy.
		CU9	<p>Parnell Square and North Inner City Cultural Cluster</p> <p>To promote and support the growth of the Parnell Square and North Inner City cultural cluster to facilitate opportunities that provide benefits both to the wider City and to the economic growth and regeneration for the NEIC that supports artists, mitigates social exclusion and increases opportunities for expression and artistic engagement for the diverse local community and in particular, young people.</p>	<p>In response, the following is set out in the Cultural Infrastructure (Impact) Assessment:</p> <p><i>"Although the Leydens LRD Development site currently lies marginally outside of the North-Eastern Inner-City boundary, the proposed provision of a minimum of 5% artist workspace provides an opportunity to complement and/or expand the offering of the NEIC to encompass the site area, in turn helping achieve the aims of Policy CU9."</i></p>
	12.5.3	CU12	<p>Cultural Spaces and Facilities</p> <p>To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments such as in basement or roof-top spaces where suitable to meet the needs of an increased population within the city.</p>	The artist studios provided in the scheme will contribute towards achieving this policy.

		CU14	Cultural Uses in Developments on Former Industrial Lands To ensure new developments on former industrial lands incorporate cultural uses (including night-time entertainment space designed to minimise impact on residential areas) as part of new mixed use communities.	The artist studios provided in the scheme will contribute towards achieving this policy.
		CU17	Design of Cultural and Arts Facilities To promote a co-design approach to cultural and arts facilities and that applicants and developers consider the Toolkit guide for artform specific workplace to inform the design of such spaces.	The Design Team has liaised with the Richmond Road Studios order to ensure a suitable space was being provided on site to accommodate their needs.
		CUO25	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 for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. *Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.	The proposed development is over 10,000 sq m and provides over 5% community, arts, and cultural spaces. The artist studios have an exhibition area to the front. Please see the <i>Architectural & Urban Design Statement</i> and area schedules for details and also Section 7.5 of this Planning Report and Statement of Consistency.
		CUO30	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 (CUO44 refers), be required to undertake a cultural audit for the local area to identify	As noted previously, a Cultural Infrastructure (Impact) Assessment is enclosed which has been prepared by Turley. We note that the artist studios were proposed to be provided prior to the introduction of this policy and are intended to be occupied by the Richmond Road

			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.	Studios who have been searching for a new location since they received notice of their eviction from existing premises on Richmond Road in 2022. Further to their eviction and search for new space, the Applicant had liaised with the Richmond Road Studios prior to the Objective being finalised in the <i>Development Plan</i> , in order to ensure a suitable space was being provided on site to accommodate their needs.
	12.5.4	CUO31	Artist Workspaces To further develop and provide for artist work spaces and spaces for creative production within the city and avail of opportunities for utilising underused buildings within communities for artistic and cultural purposes.	The proposed development includes artist's studios. Please see the <i>Architectural & Urban Design Statement</i> for details.
		CU20	Cultural Activities in the Evening To support the growth in cultural activities within the city and to encourage cultural institutions and amenities within the city to operate into early evening time on a regular basis, and to explore the development of more regular evening cultural experiences on a pilot basis.	The artist studios provided in the scheme will contribute towards achieving this policy.
		CU22	Range of Cultural and Amenity Options To seek and encourage a range of cultural and amenity options for residents and visitors within the city that are independent of licenced premises to allow options for younger people, families, elders and others to engage and enjoy a range of activities in the city during evening hours.	The artist studios provided in the scheme will contribute towards achieving this policy.
		CU23	Performance and Entertainment Spaces To protect and support Dublin city's cultural assets by facilitating the enhancement and/or growth of existing cultural spaces, including performance and entertainment spaces, while protecting the existing amenities of an area.	The artist studios provided in the scheme will contribute towards achieving this policy. An exhibition space will also be provided as part of the artist studios.
	12.5.5			
		CUO47	Accessibility	The artist studios provided in the scheme will contribute towards achieving this policy. An exhibition space will

			To encourage people of all abilities and ages including wheelchair users to take part fully in the city's culture as consumers, creators, artists and workers by supporting a high standard of accessibility in new and existing cultural assets.	also be provided as part of the artist studios. All main entrances, sanitary facilities audience and spectator areas and refreshment facilities within the artist studios will be wheelchair accessible.
	12.5.6			
		CUO54	Naming of New developments To ensure that all new developments are named in the Irish language only, to redress the historic under-representation of Irish language names in the City; whilst also reflecting the rich diversity of history and origins of place names and townland names within Dublin and also names that are reflective the social history of each place. All place names installed for new streets or estates must be bi-lingual.	Will be agreed at compliance stage with Dublin City Council.
	12.5.7			
		CU30	Life Worth Living Taskforce To seek to adapt and expand the range of public spaces in the city that can host cultural and events activities to allow for increased and more inclusive public engagement with culture and the arts.	The artist studios provided in the scheme will contribute towards achieving this policy.
Chapter 15 – Development Standards				
		15.3.2	All applications will be screened for AA by the competent authority (Dublin City Council) as part of the planning process. Applicants are however, required to carry out a screening statement and subsequent Stage 2 assessment (if necessary) for inclusion with the planning application.	Enviroguide Consulting have prepared an Appropriate Assessment Screening Report and a Natura Impact Statement.
		15.3.3	An Ecological Impact Assessment should be carried out for all developments within or adjacent to any sensitive habitat, ecological corridor, specific landscape character area or which has the potential to contain protected habitats or species.	Please see enclosed report prepared by Enviroguide Consulting.

		15.4.1	<p>Healthy Placemaking</p> <p>Key principles to consider are:</p> <ul style="list-style-type: none"> • 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. 	<p>Healthy placemaking principles have been embedded into the design of the proposed development. See Architectural & Urban Design Statement for details.</p>
		15.4.2	<p>Architectural Design Quality</p> <p>Key principles to consider are:</p>	<p>The proposed development is of a high architectural design quality and has a character that relates to the existing context. See Architectural & Urban Design Statement for details.</p>

			<ul style="list-style-type: none"> • The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site. • The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered. • The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting. • The suitability of the proposed design to its intended landuse and the wider land-use character of the area, along with its relationship with and contribution to the public realm. • The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special interest and important views and that the design incorporates high quality detail, materials and craftsmanship. • The need to protect and enhance natural features of the site, including trees and any landscape setting. • The context and orientation in relation to daylight, sunlight and overshadowing and environmental 	
--	--	--	--	--

			<p>performance including climate impacts such as downdraft or wind tunnelling.</p> <ul style="list-style-type: none"> • The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces. • Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity. 	
		15.4.3	<p>Sustainability and Climate Action</p> <p>To minimise the waste embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new build.</p> <p>Key sustainable design principles to consider are (See also Section 15.6 on Green Infrastructure):</p> <ul style="list-style-type: none"> • 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. 	<p>The proposed development embeds sustainability design principles. See Architectural & Urban Design Statement for details.</p>

			<ul style="list-style-type: none"> • Design should enhance biodiversity and provide for accessible open space and landscaping which enhances the ecological value of a site. Greening measures should be included such as the incorporation of green roofs and walls, planting and trees. See also policies as detailed in Chapter 10. • Developments should incorporate a Surface Water Management Plan in accordance with the requirements of Appendix 13 – the Council's Surface Water Management Guidance – see policy SI25. • New public and private spaces must incorporate proposals for Sustainable Drainage Systems (SuDS) in their design, where appropriate, in accordance with the Council's Guidance Document for implementing SuDS Solutions (2021). See also Appendix 12 and policy SI22 and SI23. • For larger schemes, consideration should be given to district heating schemes and combined heat and power (CHP) – see policy CA11, CA15, CA16, CA17, CA18 and Section 15.7.2 below. 	
		15.4.4	Development proposals, including all new large scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities...public buildings should ensure appropriate disability access, including disability car parking where feasible.	The proposed development and the external road enhancement works have been designed in accordance with DMURS. The works have been subject to a Quality Audit and the appropriate number of mobility impaired car parking provided as detailed in the applications Traffic and Transport Assessment Report.
			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	The proposed development is designed to comply with TGD Part M and 50% of the larger than minimum sized

			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. Part M of the Building Regulations sets out standards to ensure that buildings are accessible and usable by everyone, including the aged, people with disabilities and people with children. The Technical Guidance Document in relation to Part M provides guidance on the access requirements for public buildings and for residential dwellings.	units are designed to the Universal Design Guidelines. See Architectural & Urban Design Statement for details.
		15.4.5	<p>Safe and Secure Design</p> <p>All residential developments shall refer to Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).</p> <p>New developments and refurbishments should be designed to promote safety and security and avoid anti-social behaviour by:</p> <ul style="list-style-type: none"> • 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. 	The proposed development is designed in accordance with safety and security guidance and best practice. Please see the Community Safety Strategy in the Architectural & Urban Design Statement for details. Section 5.7 of this Planning Report and Statement of Consistency also provides a response to the relevant principles of the Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).

			<ul style="list-style-type: none"> • 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. <p>On housing developments over 100 units, the Council will require the submission of a Community Safety Strategy</p>	
--	--	--	--	--

			(see objective QHSNO15) 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.	
		15.5	<p>In considering the appropriateness of a development at a city scale, applicants should demonstrate that the scheme proposed has adopted an appropriate approach to urban intensification broadly consistent with its location.</p> <p>The key design parameters shall be addressed as part of an Architectural Design Statement to accompany development proposals. Applicants are encouraged to utilise early iterations of the design statement in pre planning consultations with the Planning authority.</p>	The proposed design has considered its appropriateness at a city scale. Previous versions of the early stages of design are included in the Architectural & Urban Design Statement.
		15.5.1	<p>Brownfield, Regeneration Sites and Large Scale Development</p> <p>Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale, regeneration and brownfield development:</p> <ul style="list-style-type: none"> ☑ 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. 	The proposed development is a large-scale regeneration of a brownfield site. Please see the Architectural & Urban Design Statement for details.

			<ul style="list-style-type: none"> • 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. 	
		15.5.2	<p>Infill Development</p> <p>Infill development should complement the existing streetscape, providing for a new urban design quality to the</p>	<p>The proposed development is located on brownfield infill land in a core urban location that is built-up, well served by public transport and is within easy cycling distance of the city centre. As detailed throughout the</p>

			<p>area. It is particularly important that proposed infill development respects and enhances its context and is well integrated with its surroundings, ensuring a more coherent cityscape.</p> <p>As such Dublin City Council will require infill development:</p> <ul style="list-style-type: none"> • To respect and complement the prevailing scale, mass and architectural design in the surrounding townscape. • To demonstrate a positive response to the existing context, including characteristic building plot widths, architectural form and the materials and detailing of existing buildings, where these contribute positively to the character and appearance of the area. • Within terraces or groups of buildings of unified design and significant quality, infill development will positively interpret the existing design and architectural features where these make a positive contribution to the area. • In areas of low quality, varied townscape, infill development will have sufficient independence of form and design to create new compositions and points of interest. • Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts in the surrounding neighbourhood. 	<p>planning application documentation, the development can be assimilated into the surrounding context. For example, the development provides the greater heights towards the centre of the site, with lower heights fronting Richmond Road, opposite lower density dwellings. The 9 No. storey block (Block C) is located at a prominent location as the road turns on Richmond Road. The 10 No. storey block (Block B) matches the height of the proposed Phase 1 development and will provide views towards the River Tolka. By providing a lower shoulder height onto Richmond Road, the block is stepped back from lower density dwellings opposite on Richmond Road, with the building stepping up in height towards the rear of the site.</p> <p>The Architectural & Urban Design Statement demonstrates the plot ratio, architectural form, materials and the details of the existing low-quality industrial structures and provides details of this high-quality development. The mixed-use nature of the scheme will activate the streetscape and the new open spaces will benefit the local community, while providing new compositions and points of interest. Waste management facilities, servicing and parking are sited to the rear of the site, and are designed sensitively to minimise their visual impact and avoid any adverse impacts to the surrounding community.</p>
		15.5.7	<p>Materials and Finishes</p> <p>Materials and finishes should be selected to ensure longevity throughout the lifetime of the development. All developments will be required to include details on the maintenance and management of the materials proposed</p>	<p>The materials and finishes are selected to ensure longevity for the lifetime of the development. Brick, stone, and metal are the primary materials used on the façade. See Architectural & Urban Design Statement for details.</p>

			<p>as part of the planning application. As such, Dublin City Council will require developments:</p> <ul style="list-style-type: none"> • To ensure materials and finishes complement the existing pallet of materials in the surrounding area. • Promote durability to ensure a good visual appearance over time. • The design and layout of buildings, together with the robustness of materials used in their construction, should be such as to discourage graffiti, vandalism and other forms of anti-social activity. • To support the use of structural materials that have low to zero embodied energy and CO₂ emissions as well as the use of sustainably sourced building materials and the reuse of demolition and excavated materials. 	
		15.5.8	<p>Architectural Design Statements</p> <p>Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary. Statements may also be required for large scale commercial development. An Architectural Design Statement is an informative, illustrative document that clearly describes the development proposal, the context in which the development is set and the design rationale for the scheme. Design statements should analyse the site context, planning context, opportunities and constraints of the site and the conceptual and detailed design of the development including the building massing, material and finishes and building articulation, (see also Policy SC23).</p>	An Architectural & Urban Design Statement is included in the application.

			Design Statements should include the following information as set out in the table below which build upon the detail of the key design parameters. Architect to review Table 15-2.	
		15.5.9	<p>Models and Photomontages</p> <p>In the case of certain large or complex planning proposals, models and photomontages of a proposed scheme to an appropriate scale will be required by the planning authority. All photo-montages submitted with a planning application or Environmental Impact Statement must include details of the type of camera and the lens used to create the image. The development should be clearly depicted. The inclusion of excessive sunshine, blue sky and any other detailing or colouring which may distort the reliability of the photomontages should be avoided.</p>	CGIs and photomontages have been prepared by 3D Design Bureau and are enclosed separately.
		15.6	<p>Green Infrastructure and Landscaping</p> <p>Planning applications will be required to address climate action as part of the overall design of the development and incorporate green infrastructure techniques. All new developments in the city are encouraged to incorporate an ecosystem services approach as a key instrument in achieving sustainable climate change action in accordance with Policy GI5 and GI6.</p> <p>The proposal should indicate how existing natural features of the site will inform sustainable urban form and should include the following:</p> <ul style="list-style-type: none"> 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 	A Climate Action and Energy Statement incorporating Part L for Planning Compliance prepared by Axiseng Consulting Engineers is enclosed separately which details how the scheme will exceed the requirements to meet Part L and NZEB compliance. The development replaces a hard-standing site which does not contribute to the green infrastructure of the city. Therefore, the scheme which introduces new open spaces and green roofs will benefit the green infrastructure in Dublin City. The open spaces will work in tandem with the pending Phase 1 development adjacent to the subject site.

			<p>landscape character of the area is retained and informs the proposed design.</p> <ul style="list-style-type: none"> • The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city's green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and 'stepping stones' to ensure biodiversity protection. • Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council's Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design. 	
		15.6.2	<p>Surface Water Management and SuDs</p> <p>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 (see Appendix 13.)</p> <p>All new developments will also be required to utilise SuDS measures in accordance with Policy SI22 of the development plan. The SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer. Appendix 12 sets out further detail regarding SuDS and should be consulted by all applicants.</p>	<p>A Surface Water Management Plan for the Development is incorporated into DBFL Consulting Engineers Infrastructure Design Report.</p>

		15.6.3	<p>Green / Blue Roofs</p> <p>Dublin City Council will require all new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23. Refer to Appendix 11 for further details.</p>	The proposed green roofs have been designed by DBFL Consulting Engineers in accordance with the <i>Development Plan</i> standards.
		15.6.5	<p>Urban Greening</p> <p>All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc. The provision of urban greening methods improves the overall quality of the environment and enhances the well-being in accordance with policy CA29 and GI16.</p>	The development includes tree planting, public and communal open spaces and green roofs which will improve the quality of this site, which is severely lacking in green infrastructure in its current state.
		15.6.7	<p>Landscape Design Rationale</p> <p>Landscape design and maintenance plans will be regarded as an integral part of all development applications. The incorporation of landscape features to protect and support biodiversity and to ensure the existing landscaping and environments are protected will be required as part of all applications. Landscaping schemes must be in accordance with Dublin City Council standards for road and footpath layout, and there will be a preference for soft landscaping, where possible.</p> <p>Materials must be appropriate, durable and of a good quality. Careful consideration must be given to the design of hard-surfaced areas including streets, squares, open spaces, paved areas, footpaths and driveways. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design. Areas of schemes to be taken in charge by Dublin City should be designed with reference to the palette of materials used by the local authority to ensure later maintenance and replacement of</p>	<p>Proposed materials are indicated on the plans and in the Landscape Design Report. As part of the application, a specification has been provided outlining maintenance regimes.</p> <p>Areas that will be taken in charge by the local authority are designed to DCC standards and follow the DCC materials palette.</p>

			<p>materials in the upkeep of the area by the local authority. See also Appendix 5, Section 8.2 and 8.3.</p> <p>Applications for substantial hard-surfaced areas must demonstrate methods of controlling and limiting surface water run-off consistent with sustainable development (see also Appendix 12 and 13).</p>	
		15.6.8	<p>Landscape Plans and Design Reports</p> <p>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. A Landscape Design Report sets out the landscape strategy for the scheme through the use of drawings, illustrations and species specification documents. A landscape report should describe the public open space and communal open space provided within a scheme to demonstrate compliance with the relevant guidelines. Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans.</p> <p>On sites with extensive vegetation and tree coverage, a separate tree report should also be incorporated into the landscape design report to support the retention of trees where possible. Landscape proposals should also take account of the biodiversity and environmental habitats present on the site and within the surrounding area and set out proposals to enhance and protect these features (see Sections 15.6.6, 15.6.9 and 15.6.10 for further details).</p> <p>Landscape design reports should address the following:</p> <ul style="list-style-type: none"> • The protection and incorporation of existing trees and landscape features worthy of retention. 	<p>A Landscape Design Report is included as part of the planning application submission.</p> <p>The report includes a planting schedule and the design has taken on board any recommendations made by the ecologist or Arborist.</p> <p>A landscape specification has been included in the planning application.</p>

			<ul style="list-style-type: none"> • 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. 	
		15.6.9	<p>Trees and Hedgerows</p> <p>Dublin City Council will seek to protect existing trees and hedgerows when granting planning permission for developments and will seek to ensure maximum retention, preservation and management of important trees, groups of trees, and hedges as set out in Section 10.5.7 of the plan.</p>	<p>The site is lacking in tree planting and thus the proposal will enhance the tree provision on site. The Tree File have carried out an Arboricultural Assessment and have prepared drawings in this regard.</p>

			<p>Dublin City Council will encourage and promote tree planting in the planning and design of private and public developments. New tree planting should be planned, designed, sourced, planted and managed in accordance with 'BS 8545:2014 Trees: from nursery to independence in the landscape – Recommendations'. New planting proposals should take account of the context within which a tree is to be planted and plant appropriate tree species for the location.</p> <p>A tree survey must be submitted where there are trees within a proposed planning application site, or on land adjacent to an application site that could influence or be affected by the development. Information will be required on which trees are to be retained and on the means of protecting these trees during construction works. Where development is proposed, it is essential that existing trees are considered from the very earliest stages of design and prior to an application for planning permission being submitted. Root systems, stems and canopies, with allowance for future movement and growth, need to be taken into account in all projects.</p> <p>The following criteria shall be taken into account by Dublin City Council in assessing planning applications on sites where there are significant individual trees or groups/ lines of trees, in order to inform decisions either to protect and integrate trees into the scheme, or to permit their removal:</p> <ul style="list-style-type: none"> • Habitat/ecological value of the trees and their condition. • Uniqueness/rarity of species. • Contribution to any historical setting/ conservation area. 	
--	--	--	--	--

			<ul style="list-style-type: none"> • Significance of the trees in framing or defining views. • Visual and amenity contribution to streetscape. 	
		15.6.10	<p>Tree Removal</p> <p>Where a proposal impacts on trees within the public realm, a revised design will need to be considered to avoid conflicts with street trees. Where a conflict is unavoidable and where a tree, located on-street, requires removal to facilitate a new development or widened vehicular entrance and cannot be conveniently relocated within the public domain, then when agreed by Parks Services and the Planning Department by way of condition to a grant of permission, a financial contribution will be required in lieu. The financial contribution is calculated by the Capital Asset Value for Amenity Trees (CAVAT) by an Arboriculturist. The payment is required to be lodged with Dublin City Council before the tree can be removed.</p>	The removal of 2 No. trees in the ownership of Dublin City Council is required in order to deliver the Richmond Road improvement works along the site frontage. The redevelopment proposals for the subject site include the removal of the existing street trees located to the south of the existing Richmond Road (located to the north-west of the proposed development site).
		15.6.12	<p>Public Open Space and Recreation</p> <p>Public open space should be of high quality landscaped design to provide for an amenity value. 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, see Section 10.5.5 Rivers and Canals and Section 9.5.2 on River Restoration.</p> <p>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</p>	The proposed development has public realm that provides a quality amenity for the area. See Architectural & Urban Design Statement for details.

			<p>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. See Section 10.5.4 and 15.8.6 for further details.</p> <p>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.</p> <p>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.</p> <p>Dublin City Council will seek the following in the delivery of public open space:</p> <ul style="list-style-type: none"> • 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. 	
--	--	--	--	--

			<ul style="list-style-type: none"> 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. 	
--	--	--	---	--

			<ul style="list-style-type: none"> Cycle and pedestrian friendly routes should be accommodated. 	
		15.6.13	<p>Boundary Treatments</p> <p>Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application. These shall include details in relation to proposed materials, finishes, and, in the case of planted boundaries, details in respect of species together with a planting schedule. In all instances, boundary treatments shall be of high quality, durable and attractive.</p>	Boundary treatments are explained and details are provided in the Landscape design booklet as part of the planning application.
		15.7	<p>Climate Action</p> <p>To mitigate against negative climatic impacts, all new developments will be required to demonstrate compliance with the climate action principles set out in Chapter 3 and as detailed below.</p>	The scheme is in accordance with all relevant climate action principles as demonstrated throughout this Report.
		15.7.1	<p>Re-use of Existing Buildings</p> <p>Where development proposal comprises of existing buildings on the site, applicants are encouraged to reuse and repurpose the buildings for integration within the scheme, where possible in accordance with Policy CA6 and CA7. Where demolition is proposed, the applicant must submit a demolition justification report to set out the rationale for the demolition having regard to the 'embodied carbon' of existing structures and demonstrate that all options other than demolition, such as refurbishment, extension or retrofitting are not possible; as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures. Existing building materials should be incorporated and utilised in the new design proposals where feasible and a clear strategy for the reuse and disposal of the materials should be included where demolition is proposed.</p>	A rationale for the demolition of the existing structures is included in Section 02 of the Architectural & Urban Design Statement. The low quality industrial structures are not suitable for refurbishment/reuse. The building materials from the existing warehouse building are not of sufficient quality to be reused in any meaningful or sustainable way in the proposed development.

		15.7.2	<p>District Heating</p> <p>District heating systems will be supported in areas identified in Chapter 3: Climate Action. In these areas, all applications should be designed to cater for district heating systems. The details of the heating system proposed and compatibility with the district heating network should be specified in all planning applications. Applicants are requested to submit a Climate Action and Energy Statement with all planning applications in this zone – see below.</p> <p>Where district heating systems are not yet in operation, the applicant is required to demonstrate how the proposed heating system of the development can connect and facilitate future use of the district heating system once in place, see policy CA15, CA16, CA17 and CA18 for further information.</p>	<p>A Climate Action and Energy Statement incorporating Part L for Planning Compliance prepared by Axiseng Consulting Engineers is enclosed separately. The report notes:</p> <p><i>"While the current design model is based on hot water heat pump system solution to achieve Part L and NZEB compliance and taking into account design progress in energy efficient solutions a number of alternative solutions had been reviewed during the planning stage energy modelling process. When the design moves into further detail stages the latest technologies will be further reviewed to ensure the most effective solution for the project is utilised. Adhering to planning conditions & building regulations, alternate M&E systems may be explored for the scheme. Should district heating become available within the zone of the development in future, we will liaise with local councils working to incorporate this into the development where possible."</i></p>
		15.7.3	<p>Climate Action and Energy Statement</p> <p>In order to comply with the policies set out in Section 3.5.2 'The Built Environment' and Section 3.5.3 'Energy' of Chapter 3, proposals for all new developments in excess of 30 or more residential units or 1,000 sq. m. or more of commercial floor space, or as or as otherwise required by the Planning Authority, will be required to include a Climate Action Energy Statement.</p> <p>The purpose of this statement is to demonstrate how low carbon energy and heating solutions have been considered</p>	<p>A Climate Action and Energy Statement incorporating Part L for Planning Compliance Report has been prepared by Axiseng Consulting Engineers and is enclosed separately.</p>

			<p>as part of the overall design and planning of the proposed development. Having regard to the above, the statement, which shall be prepared by a certified engineer, shall address:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> o decentralised energy supply systems based on energy from renewable and waste heat sources; o co-generation (combined heat and power); o district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources; o heat pumps; o include an assessment of embodied energy impacts. 	
		15.8.1	<p>Quality/Making Sustainable Neighbourhoods</p> <p>Proposals should have regard to the following guidelines in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood including 'Quality Housing for Sustainable Communities: Design Guidelines' (2007), 'Sustainable Residential Developments in Urban Areas: Guidelines for Planning Authorities' (2009) and accompanying 'Urban Design Manual (2010)', Local Area Plans - Guidelines for Planning Authorities (2013), NTA Permeability Best Practice Guide (2015), Sustainable Urban Housing; Design Standards for New Apartments (2020) Design Manual for Urban Roads</p>	<p>The proposed development has regard to and follows the principles set out on the referenced guidelines. See Architectural & Urban Design Statement for details.</p> <p>This Planning Report and Statement of Consistency has responded to these policy documents where relevant and the TTA has considered the NTA Permeability Best Practice Guide (2015).</p>

			and Streets (2019) and Design Manual for Quality Housing (2022).	
		15.8.2	<p>Community and Social Audit</p> <p>Applications for large residential developments or mixed use developments should include provision for community type uses. 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. Each of the subsections below shall be assessed as part of the community and social audit.</p> <p>A community and social audit should address the following:</p> <ul style="list-style-type: none"> • 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. <p>Where it is determined that new facilities are required the following design criteria should be considered:</p> <ul style="list-style-type: none"> • The design of the facility should allow for multi-functional use. 	<p>A Social Infrastructure Audit has been prepared by Thornton O'Connor Town Planning which assesses the provision of community facilities and infrastructure in the vicinity. The site is well served by community facilities and infrastructure and the provision of a creche, gym, retail unit and artist studios will further enhance the available of social infrastructure in the area.</p>

			<ul style="list-style-type: none"> Community facilities must be located so that they are conveniently accessible by both residents and others who may have reason to use the facility. Community facilities should be well integrated with pedestrian and cycle routes and, where they serve a wider community, located on or close to a quality public transport route. Re-development proposals on sites containing a pre-existing community use / and / or recreational use should ensure that this use in terms of floor / ground space is no less than that on-site prior to redevelopment, and if possible, should represent increased provision. Community facilities must be accessible to all members of society including persons with disabilities and the elderly. 	
		15.8.3	<p>Schools</p> <p>In accordance with the requirements for social and community audit, 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.</p>	<p>A Schools Demand Assessment has been prepared by Thornton O'Connor Town Planning and is enclosed separately. This Report concludes that:</p> <p><i>"It is judged that the potential demand generated from the proposed development can be readily absorbed by the existing schools network and other planned schools currently under development within the area."</i></p>
		15.8.4	<p>In order to meet this objective, one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be provided in all new mixed use and residential schemes.</p> <p>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:</p>	<p>The proposed development includes a c. 156 sq m creche which will cater for 35 No. children. See Architectural & Urban Design Statement for details of the creche and the Childcare Demand Assessment by Thornton O'Connor Town Planning for details of the assessment that resulted in the provision of a creche within the development.</p>

			<ul style="list-style-type: none"> • 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. <p>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).</p>	
		15.8.4.1	<p>Design Criteria</p> <p>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</p>	<p>The proposed creche has an outdoor space of 43 sq m. See Architectural & Urban Design Statement for details.</p>

			<p>appropriately located to be protected from air pollution – see objective QHSNO19.</p> <p>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.</p> <p>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.</p>	
		15.8.5	<p>Public Realm</p> <p>All residential developments that include lands within the public realm must agree, subject to a letter of consent, with the planning authority that the proposed scheme is compliant with the public realm guidance as set out on the Dublin City Council website. https://www.dublincity.ie/residential/planning/strategic-planning/public-realm-strategy</p> <p>Details of road widths, public footpaths and accessibility can be found in Appendix 5 of the plan.</p> <p>Where new public spaces that will contribute to the public realm of an area are proposed, applicants must demonstrate that such spaces provide accessibility to all, are easy to navigate and create safe and secure environments. Please see guidance on street furniture, public lighting and accessibility in this regard as set out in Section 15.17.</p>	<p>A Letter of Consent to include lands in Dublin City Council's ownership has been included with this planning application.</p>

		15.8.6	<p>Public Open space All residential development is required to provide for public open space. Regard should be had to the guidance set out in Section 15.6.12 above regarding landscaping requirements, and also Section 15.6 on Green Infrastructure.</p> <p>The public open space requirement for residential developments shall be 10% of the overall site area as public open space.</p> <p>In the case of residential developments on Z12 and Z15 zoned lands, additional open space is required in order to retain the existing open character of the lands. A total of 25% public open space will be required within these zones.</p>	<p>There are 2 No. areas of public open space provided in the development – 1 No. between Blocks A and B and 1 No. to the west of Block A. Both spaces are easily accessible from Richmond Road, creating a more inviting and hospitable environment.</p> <p>Please also refer to the Landscape Planning Report (page 9) for areas of public open space provided which is a total of 606 sq m (11% of the development site area).</p> <p>The provision of this public open space will be a significant benefit to the local community. If planning permission is not granted for Phase 1, then 11% public open space is still provided for the Phase 2 lands.</p>
		15.8.7	<p>Financial Contributions in Lieu of Open Space</p> <p>Public open space will normally be located on-site, however, in some instances it may be more appropriate to seek a financial contribution towards its provision elsewhere in the vicinity. This would include cases where it is not feasible, due to site constraints or other factors, to locate the open space on site, or where it is considered that, having regard to existing provision in the vicinity, the needs of the population would be better served by the provision of a new park in the area (e.g. a neighbourhood park or pocket park) or the upgrading of an existing park.</p> <p>In these cases, financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the City Council Parks Programme, in fulfilment of this objective.</p> <p>Financial contributions in lieu of public open space will only be applicable in schemes of 9 or more units. The details on the value of the contribution in lieu and other exemptions</p>	<p>If the Planning Authority do not consider the public open space provided in Phase 2 to be adequate as a standalone (i.e. without the Phase 1 public open space), the Applicant can provide a financial contribution towards the development of public open space in the wider area if required.</p>

			are set out in the Dublin City Section 48 Development Contribution Scheme and any future amendments thereof.	
		15.8.8	<p>Play infrastructure</p> <p>Applications which include the provision of public open space shall be subject to a requirement to provide for appropriate playground facilities. 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 also be provided in addition.</p> <p>The Dublin City Play Strategy 'Pollinating Play!' 2021 – 2025 will provide overall guidance for the development of playgrounds and play spaces in the city. It is the policy of Dublin City Council to provide accessible and inclusive play equipment and play opportunities for children and young people of all ages.</p> <p>The following Principles for Designing Successful Play Spaces shall be applied:</p> <ul style="list-style-type: none"> • Bespoke • Well-located • Use natural elements • Wide range of play experiences provided • Accessible to both people with and without disabilities • Meets community needs • Allows children of different ages to play together 	<p>The proposed development provides a children's play space within the communal podium measuring c. 87 sq m. This is considered suitable for the subject scheme providing 1 and 2 No. bedroom apartments, especially as the Childcare Demand Assessment estimates that the development could potentially generate 11 No. 0-6 year old children. The play area will be easily accessible and will use natural elements and will be attractive, safe and engaging.</p>

			<ul style="list-style-type: none"> • Builds in opportunities to experience risk and challenge • Sustainable and appropriately maintained • Allows for change and evolution • Invest in and prioritise universal design to support accessible and inclusive opportunities to play with regard to input from relevant representative organisations • ☑ Increase and enhance passive surveillance. <p>In deciding on the location of appropriate play areas, regard should be had to the needs of all age groups. Play spaces for small children, i.e. under five years old, should be provided close to residential dwellings, i.e. safe from traffic and other hazards, overlooked informally from dwellings or frequented roads or footpaths, but should be located so that disruption is minimised. These spaces should have sunny and shady parts and be equipped with natural play elements such as logs/tree stumps/sand/water, etc., and with apparatus for swinging, climbing and rocking. Play/recreational spaces and facilities for older children and teenagers, e.g. multi-use games areas, teenage shelters, skate parks, etc. should be available either within the scheme or close by, such as in a local square or green space where good linkages with the residential development can be created and where meaningful community interaction can take place. Facilities should also be provided for teens and older people where they can congregate while also respecting others. This can be achieved by providing such facilities in well trafficked, central areas of the scheme/ neighbourhood rather than trying to hide them (For further guidance see Urban Design Manual, 2009).</p> <p>Formal and informal games/recreational areas for parents and other adults should also be integrated within schemes.</p>	
--	--	--	---	--

			<p>One of the key aims for any development should be the bringing together of different groups on neutral territory where all can intermingle safely and securely.</p> <p>Play/recreational spaces should be attractive, safe and engaging. Pedestrianisation in the vicinity of such areas should be maximised, and traffic should be eliminated or traffic-calming measures put in place. In addition, these spaces should be made identifiable by appropriate 'play' signage and there should be a network of routes linking homes with these spaces which enable children to travel freely around by foot, bicycle, skates or other wheeled play vehicles.</p>	
		15.8.10	<p>Gated Communities</p> <p>Dublin City Council will resist gated communities within the city and there is a general presumption against same in order to promote permeability and accessibility in the urban area. Where a gated scheme is proposed, the applicant must demonstrate the operational management strategy for the development and clearly set out the functionality of the gate mechanism proposed. The ongoing management and maintenance of the development will need to be demonstrated to avoid any situations where the mechanism malfunctions.</p> <p>The applicant will also be required to demonstrate how the gate will function in respect of traffic movements and the potential wait time on the public road. Sufficient car parking will also need to be provided in order to prevent overspill car parking onto the public road.</p>	<p>The development will not be gated, except for the vehicular access to the car park to management parking spaces. The public and residents can easily access their home, the open spaces or the commercial / cultural spaces provided. Please refer to the DBFL Consulting Engineer's documentation for full details on the operation of the vehicular access gate.</p>
		15.9.1	<p>Unit Mix</p> <p>Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or</p>	<p>The proposed development has <50% one bedroom apartments and no studio units. See Architectural & Urban Design Statement for details.</p>

			<p>studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> <p>As part of the preparatory research for this Plan, alongside the preparation of a HNDA for the city, two sub areas were identified for sub-city level HNDA analysis; (i) the Liberties and (ii) the North Inner City.</p> <p>The following requirement for unit mix are, therefore, required in these two sub-city areas; (i) the Liberties and (ii) the North Inner City. SPPR₁ is applicable to the remainder of the Dublin City Council administrative area: To require planning applications that include residential accommodation of 15 residential units for more in the North Inner City and Liberties Sub-City Areas (as per Figure 1.2 as part of Appendix 01, Annex 3) include the following mix of units:</p> <ul style="list-style-type: none"> • A minimum of 15% three or more bedroom units. • A maximum of 25%-30% one bedroom / studio units. 	
		15.9.2	<p>Unit Size / Layout</p> <p>Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments. The minimum standards for apartments, as set out in the guidelines are as follows:</p>	<p>The unit size layout and floor areas all comply with the guidelines.</p> <p>The proposed development comprises no studio units, and 1-bed units do not exceed 50% of the total provision. In addition, 2-bed, 3-person units do not exceed 10% of the total mix.</p>

		<table><tr><th colspan="3">Table 15-5: Minimum Floor Area Requirements for Apartments</th></tr><tr><th>Unit Type</th><th>Bedspace</th><th>Floor Area Requirement (min)</th></tr><tr><td>Studio</td><td>1 bedspace</td><td>37 sq. m.</td></tr><tr><td>1 bed</td><td>2 bedspaces</td><td>45 sq. m.</td></tr><tr><td>2 bed</td><td>4 bedspaces</td><td>73 sq. m.</td></tr><tr><td>3 bed</td><td>5 bedspaces</td><td>90 sq. m.</td></tr></table> <p>The introduction of a 2 bedroom, 3 person unit may be considered within a scheme to satisfy specialist housing for Part V social housing requirement or to facilitate appropriate accommodation for older people and care assistance.</p> <p>These units will be restricted to a maximum of 10% of the overall unit mix. The 2 bedroom, 3 person unit will only be considered as part of specialist housing provision as specified above and will not be considered as standard residential accommodation.</p> <p>The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%). In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people, people living with dementia and people with disabilities.</p>	Table 15-5: Minimum Floor Area Requirements for Apartments			Unit Type	Bedspace	Floor Area Requirement (min)	Studio	1 bedspace	37 sq. m.	1 bed	2 bedspaces	45 sq. m.	2 bed	4 bedspaces	73 sq. m.	3 bed	5 bedspaces	90 sq. m.	<table><tr><th>Unit Type</th><th>No. Units</th><th>Percentage Mix</th></tr><tr><td>1-bed</td><td>65</td><td>49%</td></tr><tr><td>2-bed (3-person)</td><td>9</td><td>7%</td></tr><tr><td>2-bed (4-person)</td><td>59</td><td>44%</td></tr><tr><td>Total</td><td>132</td><td>100%</td></tr></table> <p>The scheme provides 78 No. oversized units which represents 59% of the overall unit provision. Of these 59% oversized units, some 51% are designed to be universal design (26% of the total units provided). Please see Architectural & Urban Design Statement, detail units plans and HQA for details.</p>	Unit Type	No. Units	Percentage Mix	1-bed	65	49%	2-bed (3-person)	9	7%	2-bed (4-person)	59	44%	Total	132	100%
Table 15-5: Minimum Floor Area Requirements for Apartments																																				
Unit Type	Bedspace	Floor Area Requirement (min)																																		
Studio	1 bedspace	37 sq. m.																																		
1 bed	2 bedspaces	45 sq. m.																																		
2 bed	4 bedspaces	73 sq. m.																																		
3 bed	5 bedspaces	90 sq. m.																																		
Unit Type	No. Units	Percentage Mix																																		
1-bed	65	49%																																		
2-bed (3-person)	9	7%																																		
2-bed (4-person)	59	44%																																		
Total	132	100%																																		

			<p>For larger dwellings, the provision of one main living room separate from a combined kitchen/dining area should be considered.</p> <p>The needs of children must be considered in the design of the unit and this includes play areas, storage for play equipment, bathrooms big enough to bath a child, study areas, etc.</p>	
		15.9.3	<p>Dual Aspect</p> <p>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.</p> <p>Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate.</p> <p>In prime city centre locations, adjoining or adjacent to high quality, high frequency public transport, 33% dual aspect may be accepted in locations where there are specific site constraints such as tight urban infill sites up to 0.25ha or where there is a need to maintain a strong street frontage. In the outer city (beyond the canal ring) and within the SDRA's, schemes with a minimum of 33% dual aspects units will only be considered in exceptional circumstances.</p> <p>Where single aspect is proposed, the number of south facing units should be maximised. East and west facing units are also considered acceptable. The living spaces in these units should be situated with the most preferable</p>	<p>The proposed development has 70% dual aspect units (93 No. units in total). Please see the Architectural & Urban Design Statement for details.</p>

			<p>orientation for maximum access to direct sunlight. North facing units will only be considered where they face an area of high amenity value such as a public park, water body or another significant view of interest. For clarity, north facing units are units which predominantly face north (i.e. over 50% of the façade). North east and north west units are defined as units that fall within a 45 degree angle of due north. This unit configuration will be considered in limited circumstances on a case by case basis.</p> <p>Please refer to Section 15.9.3 for example of dual aspect units that will be accepted by DCC.</p>	
		15.9.4	<p>Floor to Ceiling Height</p> <p>SPPR 5 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) set out the requirements for minimum floor to ceiling heights.</p> <p>A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided. Where commercial units are proposed or where flexibility for adaptation to alternative uses is required at ground floor level, a floor to ceiling height of 3.5m to 4m shall be applied. This will be assessed on a case by case basis.</p>	The minimum floor to ceiling heights are complied with in the proposed development. Please see Architectural & Urban Design Statement for details.
		15.9.5	<p>Lift, Stair Cores and Entrance Lobbies</p> <p>Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.</p>	There are no more than 12 No. units per apartment core. Please see Architectural & Urban Design Statement for details.

		15.9.6	<p>Internal Storage</p> <p>Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p> <p>Flexibility shall be provided in certain circumstances on a case by case basis.</p>	Internal storage is provided in all units and meets the minimum guidelines. Please see Architectural & Urban Design Statement for details.
		15.9.7	<p>Private Amenity Space</p> <p>Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p> <p>At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, 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.</p>	All units have private outdoor amenity space. Please see Architectural & Urban Design Statement for details.
		15.9.8	<p>Communal Amenity Space</p> <p>Communal amenity space must be clearly defined and distinguished within a scheme and clearly identified as part of any planning application. The communal amenity areas should be of high landscape quality and provide for adequate daylight and sunlight access throughout the year.</p>	Communal amenity space is provided for in the proposed development and it is passively overlooked by residents and the spaces will also be safe for children. These spaces provided at podium level and in upper level roof gardens will be clearly defined and only accessible for residents. The scheme provides well in excess of the communal open space requirement based on the unit

			<p>The communal amenity area should be functional and usable to a range of activities including, children's play (see Section 15.8.8 for further details), passive recreation and leisurely activities such as games and exercise.</p> <p>Communal amenity space should be located in areas that are overlooked and passively supervised. Where ground floor balconies/terraces bound directly onto communal spaces the use of a separation strip of low level planting between the two areas will be encouraged. Regard must also be had to future maintenance of amenity spaces in order to ensure that this is commensurate with the scale of development and does not become a burden on residents. On refurbishment or infill sites of up to 0.25 ha, the communal amenity requirements may be relaxed on a case by case basis.</p> <p>Development proposals shall demonstrate that the communal open space:</p> <ul style="list-style-type: none"> • Complies with the minimum standards based on each individual unit. • Will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics. • Is secure for residents and benefits from passive surveillance. • Considers the needs of children in particular in terms of safety and supervision and is fully accessible to all. • Achieves good sunlight penetration – see Appendix 16. 	<p>mix (792 sq m required and 1,480 sq m provided). The communal open space will be provided with planters, hedges, small native trees and ornamental planting which will be robust, low maintenance and resilient. Water taps can be provided throughout the landscaped open spaces at detailed design stage if required. The open spaces will have generally good sunlight penetration and without Phase 1 in situ, all spaces meet the relevant guidelines. With Phase 1 construction, just 1 No. space does not meet the guidelines.</p> <p>See Architectural & Urban Design Statement for details.</p>
--	--	--	---	---

			<ul style="list-style-type: none"> Has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections. 	
		15.9.9	<p>Roof Terraces</p> <p>Roof terraces may be provided in certain circumstances subject to an assessment of accessibility, safety and micro-climatic impacts. Roof terraces will not be permitted as the primary form of communal amenity space but may contribute to a combination of courtyard and or linear green space. The provision of roof terraces does not circumvent the need to provide an adequate accessible ground floor residential amenity that achieves adequate sunlight and daylight levels throughout the day unless exceptional site specific conditions prevail.</p> <p>It must be demonstrated that roof terraces are suitable for the intended use in terms of wind comfort levels, daylight and sunlight, noise impacts and safe and secure accessibility for all users, particularly children. Roof terraces must also accommodate landscaping features such as tree planting, shrubs and outdoor seating in order to create a quality green environment. Any such planting should be of species which can thrive in low soil depth planters and when exposed to wind conditions. How such roof terraces are to be maintained and managed must also be demonstrated. See also Appendix 11 for guidance on green roofs.</p>	Roof terraces are provided for as supplementary communal amenity space and are predominately provided at podium level. Please see Architectural & Urban Design Statement for details. It has been demonstrated that the spaces are suitable in terms of wind, daylight and sunlight and noise. All open space will be appropriately landscaped and managed by the Property Management.
		15.9.10	<p>Internal Communal Facilities</p> <p>Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents. These facilities include laundry rooms, community or meeting rooms, management offices, co –</p>	The proposed development includes a gym on the ground floor for use of residents and is also open to the public. Please see the Architectural & Urban Design Statement for details.

			working spaces etc. Other uses such as gyms or co-working spaces can also be provided and available to non-resident users also. The range of uses proposed should be discussed with the planning authority at pre application stage.	
		15.9.11	<p>Security</p> <p>New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security.</p> <p>The location of entrance doors and lobbies should be located in highly visible areas of the building and should be well lit and overlooked.</p> <p>Ground floor level apartments should be provided with a privacy strip of approximately 1.5m in order to maintain adequate security and privacy within the unit.</p>	The development incorporates safe and secure design principles as all common/public areas are overlooked. The commercial and cultural activity at ground floor and the apartments overhead will ensure that these areas are naturally surveilled.
		15.9.12	<p>Access and Services</p> <p>Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly. Internally within a scheme, access to each individual unit should be clearly identified and well lit through natural light where feasible.</p> <p>Service ducts should be easily accessible from common circulation area to facilitate maintenance.</p>	All accesses have been clearly identified in the application documents and will be suitable for all users.
		15.9.13	Refuse Storage	Refuse storage is provided at ground level for all uses provided in the development. They are easily accessible

			<p>Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the projected level of waste generation, types and quantities.</p> <p>All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan that clearly identifies the projected quantities of waste and the proposed waste collection strategy. Refer to Appendix 7 and Policy SI29 and SI30 for further details.</p>	<p>near lift/stair cores. An Operational Waste Management Plan has been prepared by AWN Consulting and is enclosed separately.</p>
		15.9.14	<p>Lifecycle Reports</p> <p>All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p> <p>The lifecycle report should include an assessment of the materials and finishes proposed, the ongoing management strategy, the protocol for maintenance and repair, the long term maintenance costs for residents and the specific measures that have been taken to effectively manage and reduce the costs for the benefit of residents.</p> <p>The reports should address each of the following headings:</p> <ul style="list-style-type: none"> o Assessment of Long Term Running and Maintenance Costs o Property / Owner Management Company and Common Areas o Service Charge Budget o Measures to Manage and Reduce Costs o Treatment, Materials and Finishes o Construction Methodology o Material Specification o Landscaping o Waste Management 	<p>A Building Lifecycle Report has been prepared by Aramark and is enclosed separately.</p>

			<ul style="list-style-type: none"> o Human Health and Well –being o Residential Management o Energy and Carbon Emissions o Transport and Accessibility <p>Compliance and acknowledgement of the provisions set out in the Multi-Unit Developments Act 2011 for the ownership and management of multi- unit developments should also be included.</p>	
		15.9.15	<p>Operational Management and Maintenance</p> <p>Service ducts serving two or more apartments should as far as practicable be accessible from common circulation areas to facilitate easy maintenance. The running of services overhead, particularly above the ceiling of a different unit should be avoided. To prevent demands for the installation of numerous individual satellite dishes on visible parts of the façades or roof of apartment buildings, provision should be made for locating communal or individual dishes on less visible parts of the building, such as at roof level. Ideally larger schemes will provide space for maintenance facilities such as a management room, maintenance store(s) and in some circumstances accommodation for a caretaker should be included.</p> <p>All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p> <p>These plans will assist the planning authority in considering the long term contribution of the development and the</p>	A Property Management Strategy Report has been prepared by Aramark and is enclosed separately.

			strategy and objectives for the maintenance and operation of the development.	
		15.9.16	<p>Microclimate – Daylight and Sunlight, Wind and Noise</p> <p>All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.</p>	<p>The following reports are included as part of this planning application:</p> <ul style="list-style-type: none"> • Microclimate Assessment by Awn Consulting (Wind). • Noise Assessment by Awn Consulting. • Daylight and Sunlight Assessment Report by 3D Design Bureau.
		15.9.16.1	<p>Daylight and Sunlight</p> <p>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.</p> <p>A best practice guide for the assessment and methodology of Daylight and Sunlight Assessments is set out in Appendix 16.</p>	A Daylight and Sunlight Assessment Report has been prepared by 3D Design Bureau and is enclosed separately.
		15.9.16.2	<p>Wind</p> <p>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.</p> <p>The Lawson Comfort Criteria sets out an appropriate pedestrian comfort levels in a given space based on suitability for pedestrian activities. The purpose of the</p>	A Microclimate Assessment has been prepared by Awn Consulting and is enclosed separately.

			<p>assessment is to clarify that the intended use of a space is suitable and to identify mitigation measures required (if any). All areas within a development should be at a satisfactory level to ensure maximum comfort levels for all users.</p> <p>Please refer to Table 15-6.</p>	
		15.9.16.3	<p>Noise</p> <p>All apartment developments should be designed as to ensure noise transmission between units and from external or internal communal areas is minimised. Guidance for noise reduction in building is set out in BS 8233:2014.</p> <p>The following principles are recommended for minimising disruption from noise in dwellings:</p> <ul style="list-style-type: none"> ☑ Utilise the site and building layout to maximise acoustic privacy by providing good building separation within the development and appropriate noise insulation measures to reduce noise transfer and vibration to neighbouring buildings and noise sources. ☑ Arrange units within the development and the internal layout to minimise noise transmission by locating busy, noisy areas next to each other and quieter areas next to quiet areas. ☑ Keep stairs, lifts, and service and circulation areas away from noise sensitive rooms like bedrooms. Particular attention should be paid to the siting and acoustic isolation of the lift motor room. <p>Proposals close to noisy places, such as busy streets / railway lines, may need a noise impact assessment and</p>	<p>A Noise Assessment has been prepared by AWN Consulting and is enclosed separately.</p>

			<p>mitigation plan. (Noise maps and Noise Action Plan are available at www.dublincity.ie).</p> <p>Please also refer to Section 15.18.9 – Noise which provides details on areas of the city with greater potential to be affected by noise given proximity to critical infrastructure such as Dublin Airport.</p>	
		15.9.17	<p>Separation Distances (Apartments)</p> <p>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.</p> <p>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.</p>	The proposed development has the appropriate setbacks and minimum distances. See Architectural & Urban Design Statement and drawings for details.
		15.9.18	<p>Overlooking and Overbearance</p> <p>'Overbearance' in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home. In established residential developments, any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance.</p>	The form and massing of the design has been carefully considered to minimise overlooking and overbearance. See Architectural & Urban Design Statement for details.

			<p>Overlooking may be overcome by a variety of design tools, such as:</p> <ul style="list-style-type: none"> • Building configurations (bulk and massing). • Elevational design / window placement. • Using oblique windows. • Using architectural features. • Landscape and boundary treatments. 	
		15.14.11	<p>Leisure Centre / Gym / Fitness Studios</p> <p>Dublin City Council will support the provision of leisure centres, gym and fitness studio uses within the city. These fitness uses have the ability to add activity and animation to the streets outside normal working hours.</p> <p>Applications for fitness related uses should, therefore, address the street frontage and avoid full manifestations on windows and doors. It is recognised that a balance needs to be struck between providing a level of privacy to the users and activity to the street, therefore, proposals for window signage and partial manifestations will be considered on a case by case basis.</p> <p>Applicants will also be required to support active travel to these facilities and, therefore, should be located in close proximity to public transport services and cycling facilities. An assessment of noise and vibration will also be required where the proposal adjoins sensitive uses such as residential developments. See also Section 15.18.9.</p>	<p>The Noise Assessment by AWN Consulting includes indicative measures to mitigate noise and vibration from the gym. These measures relate to ceiling treatment, impact absorbers etc.</p>
		15.15.1.3	<p>Best Practice</p> <p>All archaeological reports submitted with a planning application and/or prepared in compliance with planning permission shall be produced in accordance with Excavation Reports Guidelines for Authors, (NMS, 2006).</p>	<p>An Archaeological, Architectural and Cultural Heritage Impact Assessment has been prepared by Rubicon Heritage in accordance with this guidance.</p>

		15.16	<p>Sustainable Movement and Transport</p> <p>Refer to standards in Appendix 5.</p>	<p>The proposed development has been designed in reference to the local sustainable movement and transport objectives. See submitted Traffic & Transport Assessment Report for details.</p>
		15.17.2	<p>Public Lighting</p> <p>significant lighting proposals are proposed, the applicant must demonstrate that the quality environment in the surrounding area is not impacted and set out details of light levels and mitigation measures as necessary.</p> <p>The provision of public lighting, including on public roads, shall be provided in accordance with the requirements of with the latest Public Lighting Standards IS EN13201 and further updates and should be designed to minimise the impact on protected species, such as light sensitive bat species in accordance with best practice, the National Parks and Wildlife Service (NPWS) Bat Mitigation Guidelines for Ireland (2006) and the Technical Guidance Note on Biodiversity for Development Management in Dublin City (DCC 2021).</p> <p>Applications for new roads and / or public spaces should ensure that the area is appropriately lit for accessibility and safety. Development proposals for public lighting shall include:</p> <ul style="list-style-type: none"> • Details of the column height, siting and location of the lighting. • Details of the specific lantern type and design. • Details of lighting specification including lighting class, lux levels and energy efficiencies. 	<p>Bat friendly lighting has been incorporated into the design as detailed in the EclA. The lighting complies with DCC requirements including compliance with Public Lighting Standards IS EN13201. Any lighting to be taken in charge will be compliant with DCC standard approved fittings. Details of the lighting proposals are included on Axiseng Dwg No. RRL-X-ZZZ-DR-AXE-EE-60101.</p>

			<ul style="list-style-type: none"> Site lighting report to assess the impact of light overspill to the surrounding area. Site lighting should also be considered throughout construction period and the impact on the surrounding properties. Details of such should be included in the construction management plan. 	
		15.18.1	<p>Construction Management</p> <p>All developments comprising 30 or more housing units and commercial developments (as well as institutional, educational, health and other public facilities) in excess of 1,000 sq. m. should be accompanied by a preliminary construction management plan.</p> <p>Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of Construction and Demolition (C&D) waste; and Civil engineering projects which generate in excess of 500 cubic metres of waste materials used for development works on the site should also be accompanied by Construction Management Plans.</p> <p>The construction management plan shall set out the details of the on-site operations including traffic management (site access, deliveries and maintenance and staff parking), waste management, environmental impacts such as noise, air quality, vibrations and any other relevant detail associated with the development. Where appropriate, excavated material from development sites is to be reused on the subject site.</p> <p>The construction management plan should set out a clear timeline for the development, and details of the relevant on site contact for liaison with surrounding residents and businesses. For large construction projects (30 or more</p>	<p>A Preliminary Construction & Environmental Management Plan forms part of the planning application package of documentation.</p>

			<p>residential units of 1,000 sq. m. of commercial development), details of the site contact should be circulated to the local community, and where appropriate resident monitoring committees established for the duration of the project in order to promote best construction management and considered construction practices to protect the amenities of adjacent properties. The plan should consider the potential cumulative impacts of any adjacent development project under construction or planned for construction within the timeframe of the project, and set out appropriate mitigation measures to manage such cumulative impacts.</p> <p>In reviewing construction management plans, the planning authority will have regard to the following:</p> <ul style="list-style-type: none"> • Hours of operation. • Construction/phasing programme. • Community Liaison Strategy • Traffic Management Plan including employee parking and movements. • Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures. • Cumulative impacts. • Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats. • The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan • Containment of all construction-related fuel and oil within specially constructed bunds to ensure that 	
--	--	--	--	--

			<p>fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater).</p> <ul style="list-style-type: none"> • A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains. • Details of a water quality monitoring and sampling plan. • Measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed). 	
		15.18.1.1	<p>Construction Traffic Management Plan</p> <p>Objectives and measures should be included for the management, design and construction of the proposed development to control the traffic impacts of construction insofar as it may affect the environment, local residents and the public in the vicinity of the construction works.</p> <p>Where demolition is taking place on site prior to the commencement of construction, a separate demolition construction traffic management plan is required.</p> <p>A Preliminary Construction Traffic Management Plan may be required during the Development Management process to ensure the feasibility of construction on constrained or restricted sites. Cumulative impacts with adjacent development sites should also be considered.</p>	<p>A Preliminary Construction & Environmental Management Plan forms part of the planning application package of documentation, which includes a Construction Traffic Management Plan in Section 4.</p>
		15.18.1.3	<p>Phasing</p> <p>Dublin City Council may also require developers to submit a phasing and implementation programme for large developments including commercial development in</p>	<p>The development will be built in 1 No. phase. If Phase 1 is granted, it is intended to build both phases at the same time.</p>

			<p>excess of 5,000 sq. m. and residential schemes in excess of 100 units, to ensure a co-ordinated approach to the construction of the development.</p> <p>A phasing proposal should be included within the construction management plan submitted with applications for agreement with the planning authority.</p>	
		15.18.2	<p>Waste Management</p> <p>All planning applications in excess of 30 or more residential units and / or 1,000 sq. m. of commercial development shall be accompanied by both a Construction and Operational Waste Management Plan.</p> <p>The construction waste management plan may form part of the overall construction management plan and shall detail the strategy in relation to on site waste storage, segregation and disposal. Development proposals shall recycle demolition material and re-use existing building materials where possible. In all developments of 30 or more housing units or commercial developments in excess of 1,000 sq. m, a materials source and management plan showing type of materials / proportion of re use/ recycled materials to be used shall be implemented by the developer.</p> <p>The operational waste management plan shall set out the strategy for waste collection, storage and recycling. All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area. See also Appendix 7 for further details.</p>	<p>AWN Consulting have prepared an Operational Waste Management Plan and a Resource Waste Management Plan (covers Construction and Demolition Waste). Section 6.3 and Section 6.4 of the Resource and Waste Management Plan includes details on the reuse and recycling of materials.</p>
		15.18.5	Telecommunications and Digital Connectivity	

			<p>All new developments will be required to provide for open access connectivity arrangements directly to individual premises to enable service provider competition and consumer choice in line with Policy SI46 of the development plan.</p> <p>The provision and siting of telecommunications antennae shall take account of the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, (Department of Environment and Local Government, 1996), as revised by DECLG Circular Letter PL 07/12, and any successor guidance.</p> <p>Telecommunications antennae and supporting structures should preferably be located on industrial estates or on lands zoned for industrial/employment uses. Possible locations in commercial areas, such as rooftop locations on tall buildings, may also be acceptable, subject to visual amenity considerations. In terms of the design of free-standing masts, masts and antennae should be designed for the specific location.</p> <p>In assessing proposals for telecommunication antennae and support structures, factors such as the object in the wider townscape and the position of the object with respect to the skyline will be closely examined. These factors will be carefully considered when assessing proposals in a</p>	<p>The development will provide for open access connectivity arrangements directly to individual premises which will enable service provider competition and consumer choice in line with Policy SI46.</p> <p>Independent Site Management (ISM) have advised that we are in accordance with this guidance.</p> <p>The antenna proposed in the development will be shrouded to aid visual amenity. Telecommunications infrastructure is also proposed in the adjoining Strategic Housing Development (SHD) application (pending decision ABP Reg. Ref. TA29N.312352) under the control of the Applicant. If that SHD application is granted and first implemented, no telecommunications infrastructure will be required under this application for LRD permission. If the SHD application is refused permission or not first implemented, the proposed telecommunications infrastructure in the LRD application will be constructed. Therefore, it is clear that the location of the telecommunications infrastructure has been comprehensively considered.</p> <p>The proposed telecommunications infrastructure will be appropriately assimilated into the roof top of Block B, and is only a minor addition to the skyline, and thus will not negatively impact on the surrounding environment.</p>
--	--	--	---	--

			<p>designated conservation area, open space amenity area, historic park, or in the vicinity of protected buildings, special views or prospects, monuments or sites of archaeological importance. The location of antennae or support structures within any of these areas or in proximity to protected structures, archaeological sites and other monuments should be avoided.</p> <p>Where existing support structures are not unduly obtrusive, the City Council will encourage co-location or sharing of digital connectivity infrastructure such as antennae on existing support structures, masts and tall buildings (see Policy SI48). Applicants must satisfy the City Council that they have made every reasonable effort to share with other operators.</p>	<p>The proposed development encourages co-location and sharing of digital connectivity infrastructure such as antennae on existing support structures, masts and tall buildings (see Policy SI48).</p>
		15.18.6	<p>Plant Machinery</p> <p>Where required, the scale of plant at roof level should be minimised and have a suitable finish or screening so that it is discreet and unobtrusive. Plant, flues and lift overruns should not be included in the height of the building, as long as they are set back and properly screened and do not significantly add to the shadowing or otherwise of natural light beyond that of the main structure. Where plant rooms are highly visible, and occupy the majority of roof space, the impact of such will be assessed similar to an additional floor.</p>	<p>The provision of plant in the development is predominately at ground level. The lift overruns will not dominate the roofscape. If Phase 1 is not granted or first implemented, telecommunications infrastructure would be required on the roof. If required, the telecommunications infrastructure has been designed to seamlessly integrate with the surrounding context.</p>

		15.18.8	<p>Solar Energy</p> <p>In line with NZEB requirements, Dublin City Council will require all new developments to provide for solar panelling / PV panels to contribute to the energy generation in a building where feasible.</p> <p>Large scale proposals for solar panels or any development in the vicinity of the airport will be required to submit a Glint and Glare Assessment. Domestic applications will be assessed on a case by case basis.</p>	<p>We have been advised by Axiseng Consulting Engineers that solar / PV panelling is not required for the subject scheme to meet NZEB requirements.</p>
		15.18.10	<p>Air Quality</p> <p>All developments during construction and operational stage shall ensure that the air quality of the surrounding area is not effected (see also Section 9.5.7). Details of the air quality controls in place throughout construction shall be identified in the construction management plan.</p> <p>As part of the operational management of a proposal, applicants are required to facilitate air extraction / ventilation units and other associated plant and services through the use of internal ducting. Details of such proposals shall be set out in planning applications as part of Mechanical and Electrical Engineering details.</p>	<p>Air quality measures such as utilising construction techniques to minimise dust release into the air will be incorporated during construction. Reduced car parking provision and promotion of sustainable modes of transport will reduce impacts on air quality during the operational stage.</p> <p>Ventilation for the units is detailed within the Climate Action and Energy Statement incorporating Part L for Planning Compliance prepared by Axiseng Consulting Engineers.</p>
		15.18.11	<p>Ground Investigation</p> <p>Any development containing significant excavation including the construction of a basement or any development on brownfield lands should include a ground investigation report to be submitted with an application. This will determine the best practice design based on the soil composition. Where lands are considered unstable or infilled, a strategy for the support and or removal of</p>	<p>The scheme does not include a basement. However, a Ground Investigation Report for the site was prepared by Causeway Geotech. Please see enclosed as an appendix to the Infrastructure Design Report prepared by DBFL Consulting Engineers.</p>

			underground lands shall be provided as part of a planning application.	
		15.18.12	<p>Ground Contamination</p> <p>Any contaminated land will require appropriate remediation prior to redevelopment, including, in some instances, removal of material from a site which may require a licence under the Waste Management Act, 1996, as amended, prior to the undertaking of such works (see Section 9.5.6). In all cases involving contaminated land, it is the policy of Dublin City Council to require the highest standards of remediation and where appropriate to consult with the Environmental Protection Agency and other relevant bodies to resolve the environmental pollution created by contaminated land.</p> <p>Where the previous history of a site suggests that contamination may have occurred, developers will be responsible for the following:</p> <ul style="list-style-type: none"> • Undertaking a detailed site investigation, soil testing and analysis to establish whether contamination has occurred. • Providing a detailed written report of investigation and assessment (including recommendations for treating the affected ground) to Dublin City Council. • The decontamination of sites prior to new development works taking place, and the prohibition of development until Dublin City Council is satisfied that the affected ground has been satisfactorily treated. • Decontamination activities should ensure that there is no off-site migration of contaminants via run-off, soils or groundwater. 	<p>A Ground Investigation Report for the site was prepared by Causeway Geotech. Please see enclosed as an appendix to the Infrastructure Design Report prepared by DBFL Consulting Engineers. The report notes that:</p> <p><i>"Any potential contamination identified during site development work by visual or olfactory means should be investigated, including further laboratory testing, and appropriate health & safety, waste disposal and remediation measures adopted. Additional testing of the soils to be disposed from site may also be requested by the individual landfill before acceptance at their facility."</i></p>

		15.18.14	<p>Flood Risk Management</p> <p>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.</p> <p>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.</p>	A Site Specific Flood Risk Assessment was prepared by DBFL Consulting Engineers.

Appendix	Section	Policy / Objective Number	Policy / Objective	Comment
Appendix 3 – Achieving Sustainable Compact Growth	3.2	-	Appropriate higher density schemes are considered to be ones that combine mixed tenure homes, public space and community infrastructure. This can often be achieved by using building forms of 4 to 8 storeys and in this regard, higher density does not necessarily equate to high rise buildings – see Figure 1 below. High quality design and placemaking are however, the critical factors when developing higher density development.	The proposed development is a higher density mixed-use scheme which will provide 1 and 2 No. bedroom units in addition to artist studios, retail, a crèche, a gym and open spaces. Good quality placemaking principles have been embedded into the design. The mixed-use nature of the scheme will facilitate the creation of a sustainable neighbourhood. Please see the Architectural & Urban Design Statement for details.

			<p>Sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council 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. Public transport accessibility and capacity will also determine the appropriate density permissible. A varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the proposal contributes to healthy place making, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods.</p>																	
		Table 1	<p>As a general rule, the following density ranges will be supported in the city.</p> <table><tr><th colspan="2">Table 1: Density Ranges</th></tr><tr><th>Location</th><th>Net Density Range (units per ha)</th></tr><tr><td>City Centre and Canal Belt</td><td>100-250</td></tr><tr><td>SDRA</td><td>100-250</td></tr><tr><td>SDZ/LAP</td><td>As per SDZ Planning Scheme/LAP</td></tr><tr><td>Key Urban Village</td><td>60-150</td></tr><tr><td>Former Z6</td><td>100-150</td></tr><tr><td>Outer Suburbs</td><td>60-120</td></tr></table>	Table 1: Density Ranges		Location	Net Density Range (units per ha)	City Centre and Canal Belt	100-250	SDRA	100-250	SDZ/LAP	As per SDZ Planning Scheme/LAP	Key Urban Village	60-150	Former Z6	100-150	Outer Suburbs	60-120	<p>It is noted that this site area and zoning use of Inner Suburban and Inner City Sustainable Mixed-Uses does not naturally fall into one of these categories. See Architectural & Urban Design Statement for full response to this section.</p>
Table 1: Density Ranges																				
Location	Net Density Range (units per ha)																			
City Centre and Canal Belt	100-250																			
SDRA	100-250																			
SDZ/LAP	As per SDZ Planning Scheme/LAP																			
Key Urban Village	60-150																			
Former Z6	100-150																			
Outer Suburbs	60-120																			
			<p>There will be a general presumption against schemes in excess of 300 units per hectare. Recent research²⁵ has shown that very high density can challenge positive responses to context, successful placemaking and liveability aspirations, sometimes resulting in poor quality</p>	<p>The proposed development does not exceed 300 units per hectare. See Architectural & Urban Design Statement for details.</p>																

		<p>development. Schemes in excess of this density will be only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented.</p> <p>It is acknowledged that schemes of increased density are often coupled with buildings of increased height and scale. Where a scheme proposes buildings and density that are significantly higher and denser than the prevailing context, the performance criteria set out in Table 3 shall apply.</p>																
		<p>All applications should be accompanied by a calculation of density: units per ha and bed spaces per ha, plot ratio and site coverage. Table 2 below sets out indicative plot ratio and site coverage standards for different areas of the city.</p> <p>Table 2: Indicative Plot Ratio and Site Coverage</p> <table><tr><th>Area</th><th>Indicative Plot Ratio</th><th>Indicative Site Coverage</th></tr><tr><td>Central Area</td><td>2.5-3.0</td><td>60-90%</td></tr><tr><td>Regeneration Area</td><td>1.5-3.0</td><td>50-60%</td></tr><tr><td>Conservation Area</td><td>1.5-2.0</td><td>45-50%</td></tr><tr><td>Outer Employment and Residential Area</td><td>1.0-2.5</td><td>45-60%</td></tr></table> <p>The gross floor area is the sum of floorspace within the external wall of the building(s), excluding basements but including plant and tank rooms and car parking areas above ground level. In the case of a group of buildings with a common curtilage, the floor area will be aggregated. The site area includes only such land as lies within the curtilage of the related building.</p> <p>Higher plot ratio and site coverage may be permitted in certain circumstances such as:</p> <ul style="list-style-type: none">• Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.	Area	Indicative Plot Ratio	Indicative Site Coverage	Central Area	2.5-3.0	60-90%	Regeneration Area	1.5-3.0	50-60%	Conservation Area	1.5-2.0	45-50%	Outer Employment and Residential Area	1.0-2.5	45-60%	<p>The subject site does not naturally fall into these categories. The site coverage and plot ratio are considered consistent with the guidance in the national policy. Please see the Architectural & Urban Design Statement for full response to this section and also Section 7.3 of this Report.</p>
Area	Indicative Plot Ratio	Indicative Site Coverage																
Central Area	2.5-3.0	60-90%																
Regeneration Area	1.5-3.0	50-60%																
Conservation Area	1.5-2.0	45-50%																
Outer Employment and Residential Area	1.0-2.5	45-60%																

			<ul style="list-style-type: none"> 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 plot ratio. To facilitate the strategic role of significant institution/employers such as hospitals. <p>Any development with a plot ratio over 3.0 must be accompanied by a compelling case.</p>	
		4.1	<p>All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3.</p> <p>In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height.</p> <p>As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance based criteria set out in Table 3.</p>	Section 7.3.2 of this Report provides a full justification for the increased height and density proposed as part of the subject development in accordance with Table 3.
Appendix 5 - and Transport	2.1	-	All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS.	A DMURS Compliance Report prepared by DBFL Consulting Engineers accompanies the planning application. The report demonstrates how the

Mobility: Technical Requirements				development will be constructed in accordance with DMURS.
			<p>All planning applications for retail / commercial developments are to include the following:</p> <ul style="list-style-type: none"> • A place to park adjacent to the building or complex for passengers with disabilities / mobility issues as well as for drivers with disabilities / mobility issues. • Dished or level crossings at all traffic junctions and the use of tactile paving and audible signals, where appropriate. • Parking bays which are sufficiently wide to allow access for wheelchairs. • A route from a parking place to the building that is level or ramped and unimpeded by steps. • A visible, accessible entrance-way and door to the building – not a separate ‘disabled’ entrance – which is easy to distinguish and must be under cover (revolving doors and frame-less glass doors are considered to be hazardous). • Sign-posting for the buildings which is legible and well-illuminated, with lettering and numerals on doors at eye level. • Pedestrian routes in open spaces or between buildings which are free from obstructions, pathways which are wide enough for people who use wheelchairs i.e. 2000mm /Irish Wheelchair Association Best Practice Guidelines, and surfaces which are slip resistant. • In the case of changes in level, shallow ramps in addition to steps and stairways which are clearly marked and equipped with handrails. • The careful siting of bollards, gully gratings and signposts to avoid hazards. 	<p>The subject developments includes a very modest retail / commercial element. Please see the Traffic and Transportation Assessment for details regarding how the mobility and parking elements of this requirement have been addressed.</p>

			<ul style="list-style-type: none"> • Public toilets for people with disabilities which are sited so that they are accessible and usable. Large scale developments are required to install 'Changing Places' toilets. • Floor surfaces inside the building which are slip-resistant, and where there are changes in level, ramps as well as steps or stairways which are clearly marked. • Where a building is multi-storey, a lift large enough for a wheelchair and a minimum of one other person with controls that are usable from a seated position to serve all main circulation areas which provide facilities. • Clear sign-posting and usability of amenities e.g. lavatories and telephone. • The improvement of access to existing buildings and their surroundings as opportunities arise, through alterations, extensions and changes of use. • An explanation of how surrounding roads, footpaths and sight-lines will be linked. • Illustrations of access to and access within the building itself. • Diagrams showing how people can move to and through the place –including vehicles, bikes and pedestrians. • Description of how levels change within the public spaces, including pavement and dropped kerbs. • Specifications to show that disabled people will not be segregated but will be able to move around within a building at all levels and use the same entrances, corridors and rooms as everyone else without a detour. 	
--	--	--	---	--

			<ul style="list-style-type: none"> • Details of how access for the emergency services will be provided. • Where appropriate with a building, sign-posting, illustrations and diagrams to inform the public in accessible formats for people with impaired vision. • Landscape design which takes into account the needs of people with disabilities i.e. pathways should not be encroached upon and the future possibility of low overhanging branches should be avoided. All specimen trees should be selected with consideration for people with disabilities e.g. root damage to surfaces and over-hanging branches etc. 	
		2.2	Traffic and Transport Assessments (TTA) and Road Safety Audits will be required for major developments, in accordance with the National Roads Authority (NRA) (now Transport Infrastructure Ireland (TII) Traffic and Transport Assessment Guidelines (2014) and any subsequent review, to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts.	A Traffic & Transportation Assessment Report accompanies the planning application. It is also noted that a Quality Audit of the scheme proposals have been undertaken the scope of which included a Stage 1 Road Safety Audit. This Quality Audit forms part of the planning application documentation.
			Applications which comprise of, but not limited to, the construction of new roads, amendments to existing roads, any project which materially affects vulnerable road users, or any development that generates significant road movements, shall be accompanied by a Road Safety Audit and Quality Audit to assess the existing road network and set out the appropriate traffic management strategy for the new development.	It is noted that a Quality Audit of the scheme proposals have been undertaken, the scope of which included a Stage 1 Road Safety Audit. This Quality Audit forms part of the planning application documentation.
		2.3	Where a zero or reduced quantum of car parking is proposed for a residential development, a proactive mobility management strategy is essential at the early design stages to identify measures that will promote the use of sustainable modes within the development and ensure any associated	A residential Mobility Management Plan / Travel Plan forms part of the planning application documentation.

			infrastructure can be incorporated into the design. A Residential Travel Plan will be required to support the zero/reduced provision of car parking to serve a development.	
		2.4	<p>Having regard to this limited capacity, service areas shall be provided where possible within the curtilage of the site. These areas are to be used exclusively for service and delivery vehicles, details of which will be determined by the planning authority. The servicing requirements for any development should be established early in the preplanning process. Swept-path analysis shall also be submitted demonstrating the safe manoeuvrability of all vehicles servicing the site.</p> <p>Where no off-street services or on-street storage can be provided, it shall be a requirement of all new developments to submit full details of all new deliveries, including their time, frequency and manner, to the planning authority.</p>	The proposed development incorporates an internal on-site service area with dedicated loading bay. This area is to be used exclusively for service and delivery vehicles. A vehicle swept-path analysis has also been submitted demonstrating the safe manoeuvrability of all vehicles servicing the site.
		2.5	Access for emergency vehicles, refuse collections and general servicing needs (i.e. domestic/household deliveries) shall be adequately demonstrated. Identifying the location of drop off/pick up areas for deliveries, in particular for car free developments which may be reliant on third party services to meet their household requirements, shall also be considered early in the design process.	Please see the submitted Traffic and Transportation Assessment Report and accompanying DBFL swept path drawings that together provide the requested facilities and information.
		2.6	<p>For larger developments (residential and non-residential), a Delivery and Service Management Plan shall contain, but is not limited to, the following information:</p> <ul style="list-style-type: none"> ☐ Details how the proposed development will be accessed and served by deliveries, including refuse vehicles and emergency vehicles; ☐ Confirm the number, type and frequency of service vehicles envisaged for the development and detail the locations from which servicing will occur and how it will be managed; 	Please see enclosed the <i>Outline Servicing and Operations Management Plan</i> prepared by AWN Consulting.

			<p>⑦ Swept-path analysis demonstrating the safe manoeuvrability of all vehicles servicing the site.</p> <p>Where a development is located in close proximity to a Luas line, consideration to the impact of deliveries and services during the operation of the development on the Luas line shall be determined and associated mitigation measures outlined (See also section 9.2 below).</p>	
		2.5	<p>Where car parking is provided for residential or non-residential developments, a Car Parking Management Plan shall be provided regarding the continual management and assignment of spaces to uses and residents over time. Generally car parking spaces shall not be sold with units but shall be assigned and managed in a separate capacity via leasing or permit arrangements. A management scheme for any visitor car parking shall also put in place. Where car club spaces are provided within a development, a letter of confirmation from the relevant provider shall be included with an application and details submitted regarding the operation of the service within a development.</p>	<p>Please see enclosed the submitted Traffic and Transportation Assessment Report which details the proposed Car Parking Management Plan. A letter of support has been received from GoCar.</p>
			<p>Where car parking is provided for a residential development, a rationale for the quantum of car parking proposed shall be provided. This should include an analysis of census data in relation to the car ownership levels by occupiers of a similar development (i.e. houses or apartments) in the relevant electoral area and existing mode split. Reference shall also be included to the quantum of parking in the immediate area as a result of planned developments (which are subject to current planning applications or have been granted permission and not yet developed).</p>	<p>Please see enclosed the submitted Traffic and Transportation Assessment Report which details the proposed Car Parking Management Plan and associated rationale for the proposed car parking provision.</p>
			<p>Where a number of covered and secure bicycle stores are to be provided, consideration shall be given on how access to these stores will be managed for users through the submission of a Bicycle Parking Management Plan. Bicycle</p>	<p>Please see enclosed the submitted Traffic and Transportation Assessment Report which includes a section entitled 'Bicycle Parking Management' (Section 4.7). The Report details the proposed bicycle parking</p>

			stores shall be fully accessible to users of varying ability i.e. the use of ramps/lift access shall be facilitated where possible. The reliance on wheel ramps located on stair cases to access bicycle parking, especially for large residential and commercial developments with zero or reduced car parking provision is not conducive to fully accessible bicycle parking and is discouraged by Dublin City Council.	provision for both long (residents and staff) and short (visitors) term users.
			Where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively.	Please see enclosed the submitted Traffic and Transportation Assessment Report which details the proposed bicycle parking provision for both long (residents and staff) and short (visitors) term users.
			<p>The relevant bicycle and car parking requirements in Sections 3.0, 4.0, 5.0, 6.0, 7.0 and 8.0 of Appendix 3 are extracted below.</p> <ul style="list-style-type: none"> • EV parking – all must be futureproofed for EV Charging and a minimum of 50% of spaces should be full functional. • Motorcycle parking – 5 % of car parking • All roads and footpaths within developments shall be constructed to Taking-in-Charge standards. Dublin City Council sets out construction technical standards and specifications in Construction Standards for Road and Street Works in Dublin City Council (2020) and any subsequent review. • Planning applications comprising of areas to be taken in charge shall be accompanied by a taken in charge site layout plan at a scale of 1:500 which indicates the area of the site sought to be taken in charge. The details and specification of the road and footpath layout of these areas should be set out as part of the planning application. 	<p>Please see enclosed the submitted Traffic and Transportation Assessment Report which demonstrates that the scheme complies with the key sustainable transport objectives and technical requirements. It is noted that the development proposals comply with the following development management standards:</p> <ul style="list-style-type: none"> • Traffic and Transportation Assessment Report has been submitted. • A Residential MMP / Travel Plan has been submitted. • The proposals include a Parking Management Strategy. • 50% of all car parking bays are provided with EV charge points. • The appropriate number of accessible car parking bays have been incorporated into the scheme design. • The size of proposed on-site car parking spaces accord with DCC requirements.

				<ul style="list-style-type: none">• All remaining car parking spaces will be future-proofed with the appropriate ducting to enable convenient retro fitting of additional EV charge points should the demand arise.• The appropriate number of long term bicycle parking has been provided (or even exceeded)• The appropriate number of motorcycle parking spaces have been provided.• 3 No. car share vehicles are proposed.• All external works to be taken in charge have been specified to DCC standards. <p>The design of the scheme proposals including the off-site infrastructure enhancements accords with DMURS.</p>								
Appendix 11 - Technical Summary of Green & Blue Roof Guide	2.2	-	<p>Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application. The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.</p> <table><tr><th colspan="2">Table 1: Green Blue Roof Minimum Coverage</th></tr><tr><th>Type of green roof</th><th>Minimum coverage (% of total roof area being developed)</th></tr><tr><td>Extensive</td><td>70%</td></tr><tr><td>Intensive</td><td>50%</td></tr></table> <p>The percentage coverage is considered to make a reasonable allowance for the provision of overruns, roof lights, fire breaks, service penetrations and hard landscape.</p> <p>Exemptions</p>	Table 1: Green Blue Roof Minimum Coverage		Type of green roof	Minimum coverage (% of total roof area being developed)	Extensive	70%	Intensive	50%	<p>The proposed green roof adheres to the requirements of the <i>Development Plan</i> as set out in the Infrastructure Design Report by DBFL Consulting Engineers.</p>
Table 1: Green Blue Roof Minimum Coverage												
Type of green roof	Minimum coverage (% of total roof area being developed)											
Extensive	70%											
Intensive	50%											

			<p>Where roofs include photovoltaic (PV) panels, the design should consider the appropriateness of the PV panels being positioned over the vegetated areas of the roof.</p> <p>Roof areas that are not considered for a green roof due to the presence of solar panels should still be considered for a blue roof.</p>	
--	--	--	--	--

7.9 Richmond Road Area Action Plan 2007

The subject site lies within the administrative area of the *Richmond Road Area Action Plan 2007* ("Area Action Plan"). The proposed development has been designed having regard to the key policies pertaining to the subject site.

The following sections outline the key policies contained within the *Area Action Plan* which pertain to the subject site. We note that Objective SMTO27 of the *Development Plan* includes Richmond Road on the list of roads and streets to be upgraded within the six year period of the *Development Plan*. Objective SMTO27 states the following:

To initiate and/or implement the following street/road schemes and bridges within the six year period of the development plan, subject to the availability of funding and environmental requirements and compliance with the 'Principles of Road Development' set out in the NTA Greater Dublin Area Transport Strategy.

In this regard, the proposed development has provided a design that allows the road improvement works to be implemented along the frontage of the subject site.

7.9.1 Pedestrian/Cycle Route

The *Area Action* annotates a pedestrian/cycle route into the site as shown in Figure 7.4 below.

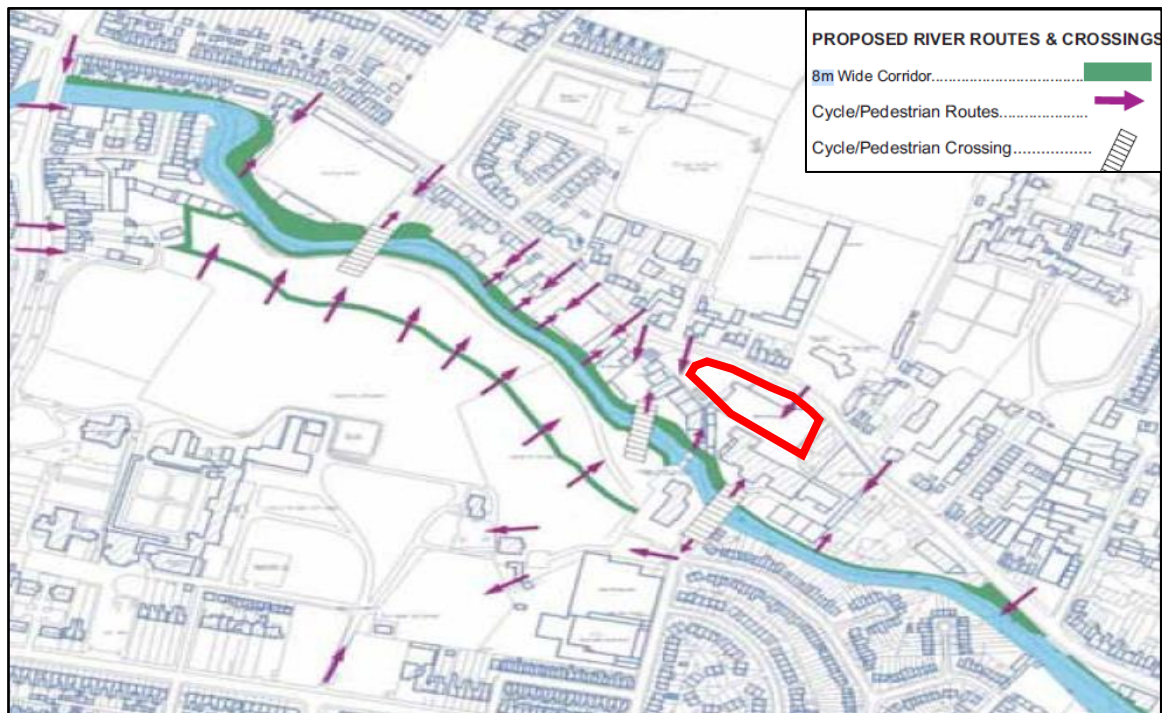


Figure 7.4: Proposed River Routes & Crossings

(Source: *Richmond Road Area Action Plan, 2007*)

The subject scheme includes multiple pedestrian access points from Richmond Road.

7.9.2 Richmond Road Improvement

In relation to potential improvements to Richmond Road, the *Area Action Plan* requires any redevelopment proposals along the road to include a 1.5-2.5 m strip of land:

"Due to the significance of the historical streetscape on parts of Richmond Road, there is limited opportunity to achieve adequate road width between 112 and 130 Richmond Road (southside). For the remainder of the road, however, from Drumcondra Road to Luke Kelly Bridge, as part of any redevelopment proposals, a strip of land will be required between 1.5 to 2.5 metres at the following locations:

- *Between 52 and 68 Richmond Road;*
- *At Tolka Park;*
- *Between 130 to 144 (former Panelling Centre) Richmond Road;*
- *At the Builder's Providers and Leydens retail warehouse, where there is an existing road widening strip;*
- *Between 193 to 219 Richmond Road".*

In response to the above, particularly the fourth bullet point which specifically mentions the subject site, the design of the proposed development has actively safeguarded the opportunity to implement road improvement works along the entire site frontage on Richmond Road.

The specific extent of the road widening works as illustrated on the DBFL drawings including Dwg No. 210178-DBFL-RD-SP-DR-C-1200 and Dwg No. 210178-DBFL-TR-SP-DR-C-1102, incorporates the widening of the northern footpath on Richmond Road to a minimum of c. 1.8 metres and the widening of the southern footpath along the site frontage which varies from c. 2.2 metres to c. 7.87 metres, the provision of a c. 1.5 metre wide cycle track/lane in each direction, and the widening of the road carriageway to 6 metres in width.

These geometric characteristics have previously been agreed as part of the planning application on the adjoining builder providers site. Accordingly, the proposed development works comply fully with the above *Area Action Plan* Objective.

8.0 CONCLUSION

Overall, the subject lands are ideally located for the sustainable development of an infill/ brownfield site in line with National and Regional Planning policy. This also accords with the impetus for higher densities and uplift in height sought by the *Apartment Guidelines, 2022*, the *Building Height Guidelines* and the *NPF*.

The proposed development represents a significant investment in a strategically located site, which is eminently suitable for a mixed-use development comprising artist studios, a creche, a gym, retail floorspace and 133 No. residential units. This is further supported by the subject site's proximity to public transport, employment, services and facilities.

The proposed development will aid in regenerating the surrounding area, creating an active street frontage and contributing to employment in the vicinity.

The scheme has incorporated all relevant details of the *Richmond Road Area Action Plan, 2007* within the Applicant's and Dublin City Council's control (e.g. road widening strip along Richmond Road and pedestrian/cyclist permeability). It is considered that the subject scheme represents a positive insertion to this site location on Richmond Road.

Please do not hesitate to contact the undersigned should you require any further information or clarification on the proposal.

Yours Sincerely,

Signed:



Patricia Thornton
Director
Thornton O'Connor Town Planning

