



# ARMSTRONG FENTON

ASSOCIATES

**PROJECT:** Large-scale Residential Development (LRD)

**LOCATION:** Junction of Swords Road & Santry Avenue,  
Santry, Dublin 9.

**REPORT:** STATEMENT OF CONSISTENCY

**CLIENT:** DWYER NOLAN DEVELOPMENTS LTD.

**DATE:** March 2024

Planning &  
Development  
Consultants



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## 1.0. Introduction

### 1.1 Purpose of Report

This Statement of Consistency has been prepared by Armstrong Fenton Associates, Planning & Development Consultants, on behalf of Dwyer Nolan Developments Ltd. (the applicant) to accompany a planning application for a Large-scale Residential Development (hereafter “LRD”) in respect of a site measuring c. 1.5 hectares located at the junction of Santry Avenue & Swords Road, Santry, Dublin 9.

Section 2 of the of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 defines “LRD” as a large-scale residential development, which means a development that includes —

(a) *the development of 100 or more houses.*

Under Section 32B of the Act of 2021, our client, Dwyer Nolan Developments Ltd, wishes to apply for permission for a LRD on the subject site. Section 32B(1)(ga) of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 states that in requesting a LRD meeting, a prospective LRD applicant should include “*a statement setting out how the proposed LRD has had regard to the relevant objectives of the development plan or local area plan in whose area or areas the proposed LRD would be situated*”.

In accordance with same, this Statement of Consistency (hereafter ‘statement’) is put forward to demonstrate that the proposed development is consistent with the relevant national, regional, and local planning policy.

This application for a LRD is also accompanied by a comprehensive range of documentation, including for, *inter alia*: Planning Statement, Social Infrastructure Assessment etc. These documents are enclosed as part of this planning application as separate standalone documents and should be read in conjunction with this statement, together with the drawings and technical reports listed in the cover letter which accompanies the request.

### 1.2 Structure of Report

The statement is structured as follows:

- Section 2 provides an overview of the proposed development:
- Section 3 details the proposed development’s consistency with national planning policy:
- Section 4 details the proposed development’s consistency with Section 28 Ministerial Guidelines:
- Section 5 details the proposed development’s consistency with regional planning policy:
- Section 6 details the proposed development’s consistency with local planning policy:
- Section 7 provides for overall conclusions to the statement.



## 2.0. Development Overview

### 2.1. Site Context

The application site is located in Santry, Dublin 9, approximately 6km to the north of Dublin city centre. Santry represents a dispersed and established suburb of north Dublin which straddles the boundaries of Dublin City Council and Fingal County Council; however, the application lies entirely within the Dublin City Council administrative area.

Specifically, the proposed LRD is located at the junction of Santry Avenue & Swords Road. The site is bounded to the north by Santry Avenue, to the east by Swords Road, and to the west by Santry Avenue Industrial Estate. To the south, the site abuts the permitted Santry Place development (granted under Dublin City Council Ref's. 2713/17 (as extended under 2713/17/X1), 2737/19 & 4549/22). Combined, the extant permissions in place at Santry Place cater for includes for a total of 253 no. apartments (comprised of 77 x 1 bed units, (incl. 1 no. studio), 151 x 2 bed units, & 25 no.3 bed units), 502sq.m retail space in Block A (3 no. retail units), a creche (331.sq.m in Block C), community unit (210sq.m in Block C), c.14,119.4sq.m office/commercial space in Blocks C, D, E and F, in 6 no. 3 to 7 storey blocks. This development is being constructed by the applicant and is currently nearing completion. The subject development has been designed with careful consideration to the design and setting of Santry Place to create spatial and visual integration between the permitted and proposed developments.

The site measures c. 1.5 hectares and is currently occupied by Chadwicks Builders Merchants (formerly Heiton Buckley Builders Merchants) in a large industrial type building with an associated yard and car parking. The site is roughly square in shape and is generally level with the road but raises slightly at the southern end.

The existing boundary to the Swords Road comprises a steel fence and mature hedging, while the boundary at Santry Avenue consists of a low wall with a steel fence on top. Existing vehicular access to the site is from Santry Avenue to the north. The site is currently fenced off from Santry Place and the existing access to same from the Swords Road; however, the proposed development will see integration between permitted and proposed developments in this regard.

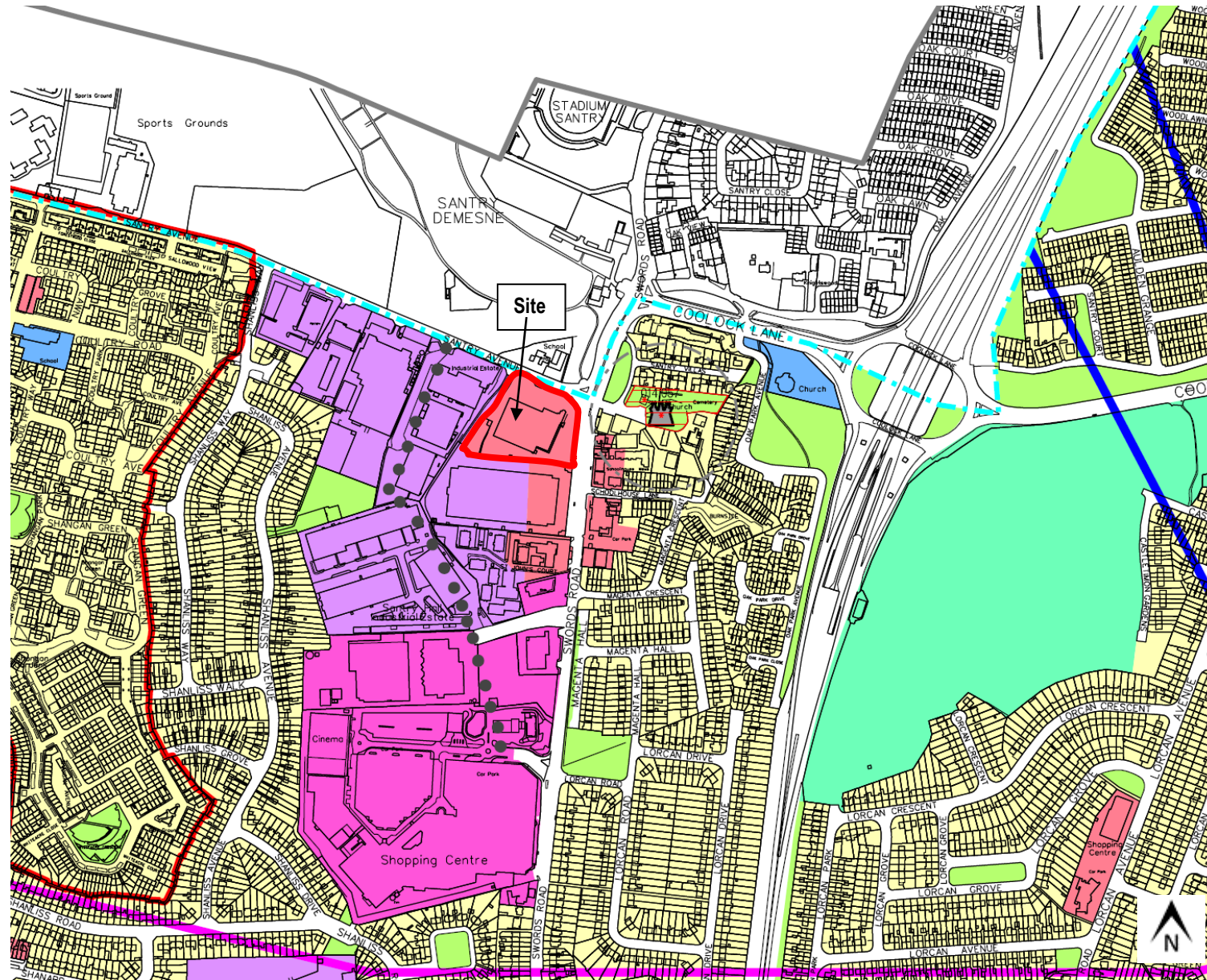
The application site is zoned "Z3" (Neighbourhood Centres) in the existing Dublin City Development Plan 2022-2028 (hereafter 'CDP') with the objective: *"To provide for and improve neighbourhood facilities"*. Residential use is listed as a 'permissible use' under the Z3 zoning, together with, *inter alia*: childcare facilities, community facilities, cultural / recreational building and uses, medical use and related consultants, office use, open space, primary health care centre, restaurant, shop (local) and shop (neighbourhood). In compliance with the CDP's vision for Z3 lands, the proposed development includes for 3 no. retail units, a medical suite / GP Practice unit, c. 1,460sq.m of floorspace dedicated to community/arts & culture uses, and a residential amenity use unit at ground floor level, with high density residential development alongside and above.





**Figure 1** - Subject Site in Context.





**Figure 2 - Subject Site Zoning (Extract of Zoning Map B of the existing CDP).**

Site outlined in red

## 2.2. Development Proposal

In summary, the proposed development provides for residential use, retail use, community/arts & culture space, a medical suite / GP Practice unit and residential amenity unit on a site measuring c. 1.5 hectares located at the junction of Swords Road and Santry Avenue, Santry, Dublin 9.

The proposed development includes for the demolition of the existing industrial type building on the site (i.e. the Chadwicks Builders Merchants) and, in its place, will see the construction of 4 no. buildings, sub-divided into 7 no. blocks (i.e. Blocks A-G), ranging from 7 no. storeys to 13 no. storeys in height, over a basement level car park.

The residential element of the development consists of 321 no. apartments comprised of the following mix of dwellings:

- 104 no. 1 bed dwellings,
- 198 no. 2 bed dwellings,
- 19 no. 3 bed dwellings.

Table 1 details a breakdown of the proposed residential mix:

| Block        | Total No. of Dwellings | No. of 1 beds | No. of 2 beds | No. of 3 beds | Total Residential Floor Area (sq.m) |
|--------------|------------------------|---------------|---------------|---------------|-------------------------------------|
| Block A      | 51                     | 22            | 23            | 6             | 3,500.50                            |
| Block B      | 38                     | 6             | 26            | 6             | 3,136.90                            |
| Block C      | 53                     | 14            | 39            | 0             | 3,892.90                            |
| Block D      | 44                     | 22            | 15            | 7             | 3,235.30                            |
| Block E      | 49                     | 7             | 42            | 0             | 3,614.30                            |
| Block F      | 52                     | 13            | 39            | 0             | 3,818.90                            |
| Block G      | 34                     | 20            | 14            | 0             | 2,106.70                            |
| <b>Total</b> | <b>321</b>             | <b>104</b>    | <b>198</b>    | <b>19</b>     | <b>23,305.50 m<sup>2</sup></b>      |

**Table 1 - Proposed Residential Mix.**

The proposed development also provides for 3 no. retail units, a medical suite / GP Practice unit, c. 1,460m<sup>2</sup> of community/arts & culture space, all located on the ground floor of Blocks A, B, C, D, E and F, and a dedicated 1 storey residential amenity use unit located between Blocks A and D. The proposed non-residential uses face onto Santry Avenue and Swords Road to cater for active frontage at an important corner location, with the proposed community/arts & culture space also extending into the site (Blocks C, D, E and F).



The following is the proposed mix of non-residential uses:

**Retail:**

- Block A – 2 no. units, 132.4m<sup>2</sup> & 171.8m<sup>2</sup> respectively = 304.2m<sup>2</sup> total
- Block B – 1 no. unit, 163.9m<sup>2</sup>
- Total retail / commercial = 468.1m<sup>2</sup>

**Medical suite / GP Practice:**

- Block B - medical suite / GP Practice unit (130.4m<sup>2</sup>)

**Community/arts & culture space:**

- C.1,460m<sup>2</sup> laid out on ground floors of Blocks C, D, E & F.

The total floor area of proposed non-residential uses = 2,058.5m<sup>2</sup>.

In addition:

**Residential amenity unit:**

- a 1 storey residential amenity unit (c. 166.1m<sup>2</sup>) located between Blocks A & D.

**Basement:**

- the floor area of the proposed basement is c.5,471m<sup>2</sup>.

The development includes for a basement level car park catering for 161 no. car parking spaces (including for 12 no. disabled parking spaces), 664 no. bicycle parking spaces, and 10 no. motorbike spaces. The basement level is internally accessible from cores of Blocks A, B, C, D, E, & F, while vehicular access to the basement is from the south between Blocks B & C. An additional 33 no. car parking spaces are provided as surface car parking. The surface car parking includes 4 no. Car Share spaces, 3 no. set down/loading areas and 6 no. mobility impaired spaces.

A total of 732 no. bicycle spaces comprised of 674 no. long term (664 spaces within basement, including 9 no. Cargo bike parking spaces and 10 no. spaces in Block G ground floor) and 58 no. short term on surface level.

Public open space of c. 1,791sq.m is provided for between Blocks C-D and E-F. Communal open space, totalling c. 2,896sq.m is provided for as follows: between (i) Blocks E-F & G, (ii) Blocks A-B & C-D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels. The development includes for hard and soft landscaping & boundary treatments, which clearly define public, private, and communal open spaces.

Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining “Santry Place” development (Dublin City Council Ref. 2713/17).

The site is currently in private use by Chadwicks Builders Merchants and therefore the development will not result in any loss or reduction of existing public open space, residential dwellings, or community related facilities. It is



considered that the development, comprising a mix of uses, represents sustainable planning of the lands available, in compliance with the land use zoning objective attached to the site, which will benefit both existing and future residents of the Santry area.

## 2.3 Development Description

The development being put forward for consideration can be described as follows:

**Dwyer Nolan Developments Ltd. wishes to apply for permission for a Large-Scale Residential Development (LRD) on this site, c. 1.5 hectares, located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9. The development site is bounded to the north by Santry Avenue, to the east by Swords Road, to the west by Santry Avenue Industrial Estate, and to the south by the permitted Santry Place development (granted under Dublin City Council Ref.s. 2713/17 (as extended under Ref. 2713/17/X1), 2737/19 & 4549/22).**

The proposed development provides for 321 no. apartments, comprised of 104 no. 1 bed, 198 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to thirteen storey buildings, over basement level, with 3 no. retail units, a medical suite / GP Practice unit and community/arts & culture space (total c.1,460sq.m), all located at ground floor level, as well as a one storey residential amenity unit, facing onto Santry Avenue, located between Blocks A & D.

The proposed development consists of the following:

1. Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants (c. 4,196.8m<sup>2</sup>).
2. Construction of 321 no. 1, 2, & 3 bed apartments, retail units, medical suite / GP Practice, community/arts & culture space, and a one storey residential amenity unit in 4 no. buildings that are subdivided into Blocks A-G as follows:
  - Block A is a 7-13 storey block consisting of 51 no. apartments comprised of 22 no. 1 bed, 23 no. 2 beds & 6 no. 3 bed dwellings, with 2 no. retail units located on the ground floor (c. 132sq.m & c.172sq.m respectively). Adjoining same is Block B, which is a 7 storey block consisting of 38 no. apartments comprised of 6 no. 1 bed, 26 no. 2 bed, & 6 no. 3 bed dwellings, with 1 no. retail unit (c.164sq.m) and 1 no. medical suite / GP Practice unit located on the ground floor (c. 130sq.m). Refuse storage areas are also provided for at ground floor level.
  - Block C is a 7 storey block consisting of 53 no. apartments comprised of 14 no. 1 bed & 39 no. 2 bed dwellings. Adjoining same is Block D which is an 8 storey block consisting of 44 no. apartments comprised of 22 no. 1 bed, 15 no. 2 bed, & 7 no. 3 bed dwellings. Ground floor, community/arts & culture space (c. 583sq.m) is proposed in Blocks C & D, with refuse storage area also provided for at ground floor level.
  - Block E is an 8 storey block consisting of 49 no. apartments comprised of 7 no. 1 bed & 42 no. 2 bed dwellings. A refuse storage area, substation, & switchroom are also provided for at ground floor level. Adjoining same is Block F which is a 7 storey block consisting of 52 no. apartments comprised of 13 no. 1 bed & 39 no. 2 bed dwellings. Ground floor, community/arts & culture space (c.877sq.m) is proposed in Blocks E & F. A refuse storage area, bicycle storage area, substation, & switchroom are also provided for at ground floor level of Blocks E & F.
  - Block G is a 7 storey block consisting of 34 no. apartments comprised of 20 no. 1 bed & 14 no. 2 bed dwellings. A refuse storage area & bicycle storage area are also provided for at ground floor level.





3. Construction of a 1 storey residential amenity unit (c. 166.1sq.m) located between Blocks A & D.
4. Construction of basement level car park (c.5,470.8sq.m), accommodating 161 no. car parking spaces, 10 no. motorbike parking spaces & 664 no. bicycle parking spaces. Internal access to the basement level is provided from the cores of Blocks A, B, C, D, E, & F. External vehicular access to the basement level is from the south, between Blocks B & C. 33 no. car parking spaces & 58 no. bicycle parking spaces are also provided for within the site at surface level.
5. Public open space of c. 1,791sq.m is provided for between Blocks C-D & E-F. Communal open space is also proposed, located between (i) Blocks E-F & G, (ii) Blocks A-B & C-D, and (iii) in the form of roof gardens located on Blocks A, C, & F and the proposed residential amenity use unit, totalling c.2,986sq.m. The development includes for hard and soft landscaping & boundary treatments. Private open spaces are provided as terraces at ground floor level of each block and balconies at all upper levels.
6. Vehicular access to the development will be via 2 no. existing / permitted access points: (i) on Santry Avenue in the north-west of the site (ii) off Swords Road in the south-east of the site, as permitted under the adjoining Santry Place development (Ref. 2713/17).
7. The development includes for all associated site development works above and below ground, bin & bicycle storage, plant (M&E), sub-stations, public lighting, servicing, signage, surface water attenuation facilities etc.



### 3.0. Policy Documents Considered

3.1. The following policy documents have informed this Statement:

#### **National Planning Context / Strategic Policy Documents**

- Project Ireland 2040 - National Planning Framework (2018),
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016),
- Housing for All – a New Housing Plan for Ireland (2021).

#### **Section 28 Ministerial Guidelines**

- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023),
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024),
- The Urban Design Manual which accompanied the now superseded Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities for Child Care Facilities (2001),
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018).

#### **Other national guidance documents:**

- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007),
- Design Manual for Urban Roads and Streets (DMURS) (2019),
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009).

#### **Regional Planning Context**

- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (2019)
- The Transport Strategy for the Greater Dublin Area 2016-2035

#### **Local Planning Context / Statutory Policy Documents**

- Dublin City Development Plan 2022-2028

## 4.0 Statement of Consistency with National Policy

The following sets out the proposed development's compliance with a range of relevant national, regional and local planning guidelines and policies.

### 4.1. National Planning Context

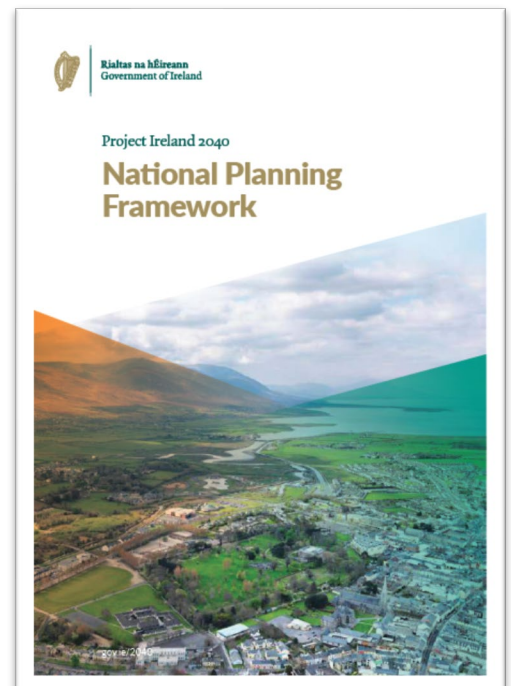
This section of the Statement sets out the proposed development's compliance with a range of relevant national planning policy, namely: Project Ireland 2040 - The National Planning Framework (2018), Rebuilding Ireland: Action Plan for Housing and Homelessness (2016), and Housing for All – A New Housing Plan for Ireland (2021).

#### 4.1.2 Project Ireland 2040 - National Planning Framework (2018)

The Project Ireland 2040 - National Planning Framework (hereafter "NPF") was published in 2018 and as the Government's high-level strategic plan for shaping the future growth and development of the country to cater for a projected population increase of c. one million people up to the year 2040. The NPF is accompanied by the National Development Plan, a 10 year capital investment strategy, and together they are known as Project Ireland 2040.

A core element of the NPF's strategy is to deliver compact growth with the key features being as follows:

- *Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.*
- *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.*
- *Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.*



The NPF provides a framework for future development expressed through 10 no. National Strategic Outcomes, as illustrated in Figure 3 overleaf. To achieve these National Strategic Outcomes each of the NPF's 11 no. chapters contain National Policy Objectives which promote coordinated spatial planning, sustainable use of resources and protection of the environment and the Natura 2000 network.

Section 6.6 of the NPF, states that one of its core principles 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, it is put forward that the provision of 317 no. high-quality residential units, comprising a mix of unit sizes and typologies at the subject site will contribute to achieving this core principle of the NPF.





**Figure 3** - National Strategic Outcomes of the NPF.

The 2016 Census states the population of Dublin City as being c. 554,554 persons. The average household occupancy rate in Dublin City was 2.48 persons per dwelling in 2016 which compares to a State average of 2.75 persons per dwelling. The NPF notes that the average household occupancy rate in the State is expected to decline to around 2.5 persons by 2040, which will have impacts on the types of housing required to meet demand.

**NOTE:** We note that since the publication of the NPF that Census 2022 was undertaken, which marked the first time in 171 years that the population of Ireland surpassed 5 million people. Census 2022 also showed that the population of Dublin City was 588,233 which is an increase of 6% (33,679 persons) between April 2016 and April 2022. We also note that the average household size in Dublin City remained at 2.48 people in 2022. (Source: [www.cso.ie](http://www.cso.ie) ).

### **Statement of Consistency**

While the above is not a policy objective of the NPF, it is noted that the proposed development provides for a range of 1, 2 & 3 bed dwellings which are considered to meet the housing demands in the Dublin City and cater for the projected household sizes in the future.

- **National Policy Objective 8** of the NPF seeks to:

*“ensure that the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets set out in Table 4.1.”*

With reference to same, Table 4.1. of the NPF details the 2016 population of “Dublin City and Suburbs” as being 1,173,179 persons, with a targeted population growth between 235,000-293,000 persons to the year 2040, giving a minimum population target of 1,408,000 within the life of the NPF.

| Settlement Name         | Population<br>2016 | Resident<br>Workers | Total<br>Jobs | Jobs:<br>Resident Workers |
|-------------------------|--------------------|---------------------|---------------|---------------------------|
| Dublin city and suburbs | 1,173,179          | 524,019             | 512,449       | 0.978                     |

### Statement of Consistency

In accordance with National Policy Objective 8 of the NPF, the proposed development will deliver much needed new housing within the existing boundaries of Dublin City which will greatly aid the achievement of the targeted population growth for Dublin City and Suburbs up to the year 2040 in accordance with Table 4.1 of the NPF.

The other National Policy Objectives of the NPF considered to be most relevant to the subject development proposal are detailed below, together with a description of the proposed development's consistency with same.

- **National Policy Objective 1b** - *"Eastern and Midland Region: 490,000 - 540,000 additional people i.e. a population of around 2.85 million."*
- **National Policy Objective 1c** - *"Eastern and Midland Region: around 320,000 additional people in employment i.e. 1.34 million in total."*
- **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."*

### Statement of Consistency

In accordance with the above National Policy Objectives of the NPF, the proposed development will deliver a high-density development of modern new homes, within an existing urban area in one of the five cities identified by the NPF (Dublin City) and thus aid the supply of housing for the targeted population of the Eastern and Midland Region. The proposed development also includes for non-residential uses (commercial/retail, medical suite / GP practice community/cultural use etc.) capable of providing new employment opportunities. The application site is located proximate to existing public transport (bus services), being adjacent to the existing Swords Road QBC and the proposed BusConnects Corridor on same, which will allow for ease of movement from the development to existing employment centres e.g., Santry, Swords, and Dublin City centre.

- **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 and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."*
- **National Policy Objective 6** - *"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."*



### **Statement of Consistency**

In accordance with the above National Policy Objectives of the NPF, the proposed development will deliver a high density (c. 214 units per hectare net) development of modern new homes, within an existing urban area in close proximity to existing public transport and local service provision. It is considered that the proposed development meets the objective of providing new homes at a location that can support sustainable development at a sufficient scale of provision relative to its location, in particular that the location of new housing be prioritised in existing settlements.

The proposed development caters for a contemporary development of high quality design and amenity, providing for a mix of dwelling typologies that can support the needs of a diverse range of people and living requirements, employment opportunities, and is designed to integrate with the surrounding environs and support / rejuvenate the wider community.

- **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.”*

### **Statement of Consistency**

In accordance with the above National Policy Objective of the NPF, the proposed development provides for a high-density residential development located in the existing built-up environs of Dublin City and includes for uses (retail, community/arts & culture space, medical suite / GP practice) capable of providing new employment opportunities.

The application site is located proximate to existing public transport (bus services), being adjacent to the existing Swords Road QBC and the proposed BusConnects Corridor on same, which will allow for ease of movement from the development to existing employment centres e.g., Santry, Swords, and Dublin City centre.

All the proposed residential units are designed to meet the appropriate planning standards of the Sustainable Urban Housing: Design Standards for New Apartments (2023) and the proposed layout provides for open spaces / employment facilities in compliance with the “Z3” land-use zoning objective attached to the site.

The proposed development is therefore considered to be strengthening the vitality of the existing Santry area, encouraging more people, jobs, and activity, within an existing urban area and supporting National Policy Objective 11 of the NPF.

- **National Policy Objective 13** - *“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”*

### **Statement of Consistency**

The proposed development will provide for a high-quality residential scheme through the design, quality, materials and finishes proposed.

All of the proposed units are meet with and / or exceed of the minimum apartment size requirements stated in the Sustainable Urban Housing: Design Standards for New Apartments (2023) and provide well orientated spacious



units. Given the total quantum of units being 321 no., the total minimum recommended minimum floor area ought to be c.20,714m<sup>2</sup>, with a total residential floor space proposed of 23,305.5m<sup>2</sup>. Therefore, the no. of units proposed are at c. 13% greater than the minimum gross floor areas stated in the aforementioned guidelines.

Car parking for the proposed development has been designed to not be visually dominant with only 33 no. car parking spaces (c. 16% of the total no. proposed) provided for at surface level with the remainder provided in the proposed basement. Car parking is provided at a rate that accords with the relevant standards as set out in Section 4.3 of the submitted Traffic and Transport Assessment Report (TTA) prepared by DBFL Consulting Engineers.

The siting and design of individual buildings within the scheme ensures that building heights allow for an appropriate level of sunlight/daylight and amenity, while also providing for a scheme that can achieve targeted growth within Dublin City. Further details of the proposed building heights and their compliance with relevant Section 28 Ministerial Guidelines can be found in Section 5 of this Statement. A Daylight and Sunlight Assessment Results document has also been prepared for the proposed development by Chris Shackleton CS Consulting and is enclosed with the application – please refer to same.

The density of the proposed development accords with the requirements set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) as demonstrated in Section 5.3 of this Statement.

Chapter 6 of the NPF focuses on enhancing the quality of life in Ireland's cities, towns, and villages. The NPF acknowledges that it cannot effect change in all dimensions that contribute to quality of life; however, there are some key elements that it will directly impact on, most importantly 'the natural and living environment'. The following National Policy Objectives are considered relevant:

- **National Policy Objective 27** - *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.”*

### **Statement of Consistency**

The proposed development seeks to deliver an appropriate form and scale of residential development adjacent to an existing public transport corridor (Swords Road), which is also a proposed BusConnects Corridor.

The proposed development has sought to minimise the surface level car parking to not dominate the scheme and promote safety and enjoyment for pedestrians / cyclists. The development has been designed to support sustainable transportation modes and permeability, seeks to reduce the provision of car parking, and increase building heights at a suitable corner location adjacent to existing public transportation. The development therefore supports National Policy Objectives 27 of the NPF.

- **National Policy Objective 28** - *“Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.”*

### **Statement of Consistency**

The proposed development will deliver a high-density development of modern new homes with all of the proposed units meeting with and / or exceeding of the minimum apartment size requirements stated in the Sustainable Urban Housing: Design Standards for New Apartments (2023) and provide well orientated spacious units. Out of the total 321 no. units proposed, 212 no. exceed the minimum floor area requirements by over 10%, which equates



to c.66% of the total no. of units that are more than 10% over the minimum gross floor areas stated in the aforementioned guidelines.

The proposed development provides for a dedicated communal amenity unit as well as an ample provision of communal open spaces, in addition to a generous provision of public open space, ensuring a high level of amenity for future residents and opportunities for social mixing.

The proposal also includes for mixed uses (retail / commercial, community / cultural uses, medical suite / GP practice) providing for new employment opportunities and sustainability. The proposed development also provides for 32 no. units, representing 10% of the total number, put forward in compliance with Part V of the Planning & Development Act 2000 (as amended) Social & Affordable Housing.

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

#### **Statement of Consistency:**

The proposed development seeks to deliver 321 no. dwellings which will greatly contribute to the existing housing stock.

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

#### **Statement of Consistency:**

The application site is located within the metropolitan area of Dublin City which is identified for significant residential growth over the next two decades. The proposed 321 no. units will provide new residential development on this zoned site. It is considered that the non-residential uses proposed within the development accord with the Z3 land use zoning objective attached to the site, and in tandem with the site's location and existing / proposed public transport infrastructure ensure that the development is sustainable.

- **National Policy Objective 34** - *“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.”*

#### **Statement of Consistency:**

The proposed residential dwellings are of a generous size which meet with and / or exceed of the minimum apartment size requirements stated in the Sustainable Urban Housing: Design Standards for New Apartments (2023). Out of the total 321 no. units, 66% of them (i.e. 212 no.) are more than 10% over the minimum gross floor areas stated in the aforementioned guidelines. It is considered that the residential dwellings are adaptable and can cater for internal alterations as required over the course of the lifetime.

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

#### **Statement of Consistency:**

The proposed development will provide a high-density residential scheme within the existing settlement of Santry and in close proximity to Dublin City centre. It is considered that the proposed development will transform an urban infill, brownfield site into a new modern high-quality mixed-use and residential area.



Chapters 9 & 11 of the NPF focus on the need to provide for a sustainable environmental future and the requirement to assess the impact of new developments on the environment. The following National Policy Objectives are considered relevant:

- **National Policy Objective 52** - *“The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.”*
- **National Policy Objective 53** - *“Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.”*
- **National Policy Objective 54** - *“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”*
- **National Policy Objective 56** - *“Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.”*
- **National Policy Objective 57** - *“Enhance water quality and resource management by:*
  - *Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities;*
  - *Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process;*
  - *Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), nonporous surfacing and green roofs, to create safe places.”*
- **National Policy Objective 63** - *“Ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.”*
- **National Policy Objective 64** - *“Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.”*
- **National Policy Objective 65** - *“Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.”*
- **National Policy Objective 75** - *“Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.”*



## **Statement of Consistency with the NPF**

It is considered that the proposed development is wholly consistent with the above-mentioned National Strategic Outcomes and National Policy Objectives of the NPF.

The development supports the population targets for both Dublin and the Eastern & Midland Region contained in the NPF. The development will deliver much needed housing on zoned lands at an appropriate scale and density in an existing built-up area. The NPF seeks to address existing shortages in housing in key urban areas by increasing the quantum of apartments in the State to be more in line with European averages. The NPF notes that 80% of all households in Dublin city are made up of 3 persons or less. The development, through its design, density, and proposed residential mix, supports the targets of the NPF to increase apartment supply in existing urban areas well served by public transport.

With specific regard to ‘*Dublin City and Metropolitan Area*’, the NPF states that Dublin needs to “*accommodate a greater proportion of the growth it generates within its metropolitan boundaries*” by requiring a “*focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development*”. The proposed development supports these national targets for the growth of Dublin. The subject site is located within the M50 ring and caters for the regeneration / redevelopment of an industrial type setting which currently does not represent an efficient use of zoned, serviced lands at this location. The development puts forward increased density and building heights which are appropriate to the site given the design and the contextual location of the development.

The NPF details that key future growth enablers for Dublin include for, inter alia:

- *“Identifying a number of ambitious largescale regeneration areas for the provision of new housing and employment throughout the city and metropolitan area”,*
- *“Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally”,*
- *“Enabling enhanced opportunities for existing communities as development and diversification occurs, particularly through employment, learning and education support”.*

The proposed development supports these growth enabling targets for Dublin through its location, scale, density, proposed mix of uses, and regeneration of a less intensive site situated within the M50 ring.

The proposed development is put forward with full consideration to the protection of the environment and as having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital. It is considered that the proposed development, through its density, building heights and layout, provides for efficiency in land management and supports the objectives to reduce urban sprawl.

Under the previous SHD application (Ref. ABP-310910-21) was to a Site-Specific Flood Risk Assessment, Arboricultural Assessment, Environmental Impact Assessment and Appropriate Assessment (AA) Screening, all of which were deemed appropriate. This LRD application includes updated versions of these assessments which confirm the appropriateness of the proposed development.

In terms of trees, an Arboricultural Assessment is submitted as part of this LRD application, however, as the layout remains relatively the same as that previously proposed on the subject site, as well as the landscape concept to be applied, we note that the An Bord Pleanála Inspector stated the following in his assessment of the aforementioned SHD application: *“The site is currently of low value for ecology, with only marginal vegetation / habitats on the perimeter of the site. Trees on the eastern and western boundaries are to be retained, however, I*



*note that the trees on the western site boundary are not of high quality. The planning authority Parks Dept. describe the tree / hedge impact of the development as low and that there is adequate compensatory planting and landscaping proposed. I concur with this conclusion”.*

The previous SHD application on the subject site was subject to Appropriate Assessment Screening, with a Screening Report prepared by Enviroguide Consulting submitted. This LRD application includes an updated AA Screening Report but we note that the An Bord Pleanála Inspector stated the following in his assessment of the previous SHD application on this site in relation to AA: *“it is concluded that the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on North Dublin Bay SAC (000206), North Bull Island SPA (004006), South Dublin Bay and River Tolka Estuary SPA (004024), South Dublin Bay SAC (001266) or any European site, in view of the sites’ Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required”.*

In addition, to the above, we note that the submitted AA Screening Report concludes that: *“on the basis of objective information; the possibility **may be excluded** that the Proposed Development will have a significant effect on the European sites listed below:*

- *North Dublin Bay SAC (000206)*
- *South Dublin Bay SAC (001266)*
- *North Bull Island SPA (004006)*
- *North-west Irish Sea SPA (004236)*
- *South Dublin Bay and River Tolka Estuary SPA (004024)*

*The screening exercise above used the best available scientific knowledge and objective information to assess potential impacts to European sites arising from the project itself or in combination with other plans and projects. Based on this assessment, and in light of these sites’ conservation objectives, the possibility of any likely significant effects on the above listed European sites **may be excluded**. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process and the preparation of an NIS is not required”.*

Under the previous SHD application (Ref. ABP-310910-21), the development was subject to full Environmental Impact Assessment with an Environmental Impact Assessment Report (EIAR) submitted. We note that the An Bord Pleanála Inspector stated the following in his assessment of the EIAR submitted as part of the previous SHD application: *“The EIAR has considered that the main significant direct and indirect effects of the proposed development on the environment would be primarily mitigated by environmental management measures, as appropriate. The assessments provided in the individual EIAR chapters, and in supplementary reports and documents provided by the applicants, are satisfactory. I am satisfied that the information provided enables the likely significant environmental effects arising as a consequence of the proposed development to be satisfactorily identified, described and assessed. I am satisfied that the proposed development would not have any unacceptable direct or indirect effects on the environment”.* An updated Environmental Impact Assessment Report is enclosed with this LRD planning application – please refer to same for full details.

The proposed development will be constructed to the most up to date standards and Building Regulations ensuring energy efficiency within the scheme. It is considered that the development ensures for the protection of environmental features of note, with mitigation measures put in place where necessary, to ensure sustainable development.

- **National Policy Objective 60:** *“Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance.”*



### **Statement of Consistency:**

Please refer to the submitted Archaeology chapter (Chapter no. 14) as part of the submitted EIAR. In addition, an updated Architectural Heritage Impact Assessment is included, prepared by Dermot Nolan, Conservation Architect – please refer to same. These submitted assessments confirm the appropriateness of the proposed development.

### **Evaluation of Consistency with the NPF:**

In accordance with the National Policy Objectives of the NPF, the proposed development will deliver a high density development of modern and adaptable new homes within an existing urban area in close proximity to existing / future public transport (i.e. Bus Connects) and local service provision. The proposed development meets the objective of providing new homes at a location that can support sustainable development and is put forward at an appropriate scale of provision relative to its location, in particular that the location of new housing be prioritised in existing settlements. Furthermore, the proposed development supports National Strategic Outcome 1, ‘Compact Growth’, which seeks to make 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.”*

The proposed development will provide a high-quality residential scheme in a sustainable location and help to achieve the NPF’s overall aims. Development of the subject site is considered to be fully in accordance with the recommendations of the NPF and sustainable growth patterns. The proposed development will increase the local population and support existing / future public transport (i.e., BusConnects), services and facilities in the area. Furthermore, the site’s highly accessible location will encourage walking, cycling and public transport use as alternatives to the car.

#### **4.2.2 Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)**

Rebuilding Ireland is the Government’s Action Plan for Housing and Homelessness. The overarching aim of the Action Plan is to increase the delivery of housing, from its current undersupply across all tenures, to help individuals and families meet their housing needs.

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the Action Plan which states that:

*“locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while delivering on sustainability objectives related to efficiency in service delivery and investment provision.”*



The Action Plan is structured on five key pillars, with Pillars 2, 3, & 4 considered most relevant:

- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector

## **Statement of Consistency with Rebuilding Ireland**

The development provides for 321 no. dwellings comprised of 1, 2, & 3 bed apartments, with 32 no. of the total no. of dwellings proposed to be delivered to Dublin City Council as social housing, representing 10% of the total no. of proposed dwellings in compliance with the provision of Part V of the Planning & Development Act 2000 (as amended). The proposed social housing units are located in Block F and cater for 32 no. 1 & 2 bed dwellings which are considered to be appropriate to the social housing requirements of Dublin City Council. The applicant has previously held talks with the Housing Section of Dublin City Council and a final agreement on Part V units will be made subsequent to the receipt of a grant of permission should one be forthcoming. The development is considered to fully support Pillar 2 of the Rebuilding Ireland Action Plan.

The development provides for 321 no. new residential dwellings on underutilised, brownfield, zoned site located within the existing urban footprint of Dublin City. The subject site is located at an important corner location on an established entrance route into the city, adjacent to the Swords Road QBC, and easily accessible to the M50 / M1 motorways. The development will substantially add to the residential accommodation available in Santry and therefore help address the increasing housing demands in Dublin. The development is also put forward at a scale and density which is appropriate to the locational context of the site. The development is considered to fully support Pillar 3 of the Rebuilding Ireland Action Plan.

The development will cater for both homes to purchase and homes for the rental sector. The proposed dwellings have been designed to meet the most up to date standards for residential accommodation i.e. the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023). The development is considered to support Pillar 4 of the Rebuilding Ireland Action Plan.

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

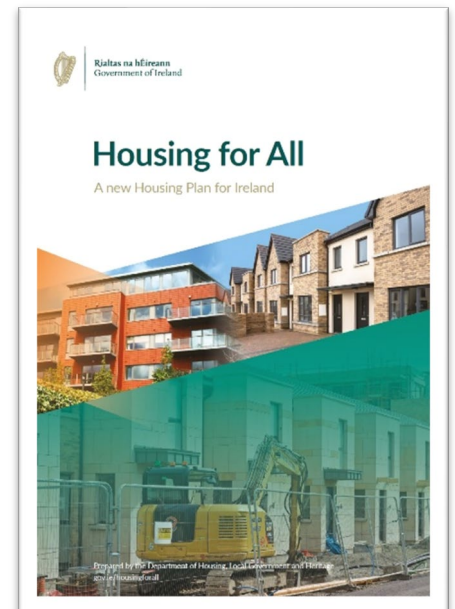
Housing for All - a New Housing Plan for Ireland was launched in 2021 and is the Government's housing plan to the year 2030. The Plan sets out how short, medium and long-term challenges of housing system will be addressed.

The overall aim of the Plan is that everyone in the State has access to a home to purchase or rent at an affordable price, which is built to a high standard in the right place in support of climate action, offering a high quality of life.

The Plan is supported by additional funding and aims to work with all stakeholders, with a central element Plan being working with and enabling the private sector to deliver on housing.

The Plan estimates that Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the NPF. To achieve these targets the Plan is based upon four pathways as follows:

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



**Statement of Consistency with Housing for All:**

The development is considered to be consistent with objectives of Housing for All - a New Housing Plan for Ireland. The development provides for 321 no. new residential dwellings on an urban, zoned, site located within the existing urban footprint of Dublin City. The development is situated on a site which is accessible to a wide range of services and amenity areas at both Santry and Dublin City centre. The site is well served by existing public transport, being adjacent to the existing Swords Road QBC and the proposed BusConnects route on same.

The provision of these units will substantially add to the residential accommodation available in Santry / Dublin City thus increasing new housing supply, which will ultimately aid the objective to increase housing affordability. It is envisaged that all, if not the majority, of the dwellings proposed will be for sale to individual buyers thereby supporting homeownership.

The development will also deliver 10% of the proposed no. of dwellings for Part V requirements (32 no. dwellings) and therefore supporting the aim to increase social housing delivery and support social inclusion.

## 5.0 Statement of Consistency with Section 28 Ministerial Guidelines

This section details the proposed development's compliance with relevant Section 28 Ministerial Guidelines, namely the following:

- Urban Development and Building Heights Guidelines for Planning Authorities (2018),
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023),
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024),
- The Urban Design Manual which accompanied the now superseded Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities for Child Care Facilities (2001),
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018),
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007),
- Design Manual for Urban Roads and Streets (DMURS) (2019),
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009).

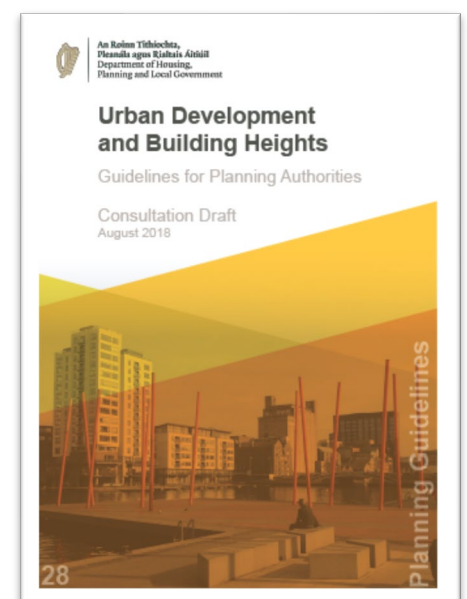
Please note that whilst the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) have replaced the Guidelines for Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009), this statement has had regard to the Urban Design Manual – A best practice guide (2009).

### 5.1 Urban Development and Building Heights Guidelines for Planning Authorities (2018)

**5.1.1** The 2018 Urban Development and Building Heights Guidelines (hereafter 'UD&BHG') carry forward the National Policy Objectives of the NPF and the Regional Policy Objectives of the Eastern & Midland Regional Spatial and Economic Strategy (hereafter E&MRSES). In summary, the UD&BHG seek to reinforce the need to consolidate and strengthen existing built-up areas, move away from blanket limitations on building height, increase densities within existing urban areas, and promote increased building height in locations with good public transport services.

**5.1.2** The UD&BHG clearly state, 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 city and town cores and in other urban locations with good public transport accessibility** (our emphasis added).

**5.1.3** The UD&BHG also clearly state that Planning Authorities and An Bord Pleanála are required to have regard to, and apply, any specific planning policy requirements (SPPRs) of the guidelines, in carrying out their functions, and that SPPRs stated in the UD&BHG take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes. In this regard, Section 9(3) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 provides as follows: (our emphasis added)



*“(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.*

*(c) In this subsection “specific planning policy requirements” means such policy requirements identified in guidelines issued by the Minister to support the consistent application of Government or national policy and principles by planning authorities, including the Board, in securing overall proper planning and sustainable development.”*

**5.1.4** The UD&BHG emphasise that the achievement of the NPF Objectives and Outcomes requires increased density, scale, and heights in town and city cores.

**5.1.5** In relation to redevelopment and enhancement of the city core, the UD&BHG state:

*“to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation term on reusing previously developed “brownfield” land, building up urban infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements”.*

**5.1.6** Significant emphasis is also placed on promoting development within the existing urban footprints and utilising existing sustainable mobility corridors and networks:

*“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors and networks”.*

**5.1.7** The UD&BHG further state that: *“the preparation of development plans, local area plans, and Strategic Development Zone Planning Schemes and their implementation in the city, metropolitan and wider urban areas must therefore become more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights”.*

### **Statement of Consistency with the UD&BHG:**

**5.1.8** The proposed development provides for the redevelopment of an existing underutilised, brownfield, infill site in a prominent, highly accessible, sustainable location. The proposed development will contribute towards delivering compact growth in our urban areas. The CDP 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 CDP. We note, in particular, National Policy Objective 35 of the NPF, which seeks an increase in 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. It is therefore put forward that the subject site has the potential for increased heights to sustainably densify this strategic site having regard to the high-quality architectural design applied of the scheme, the provision of a number of high quality, accessible open spaces and the site’s location along an acknowledged Public Transport Corridor, which will all contribute towards absorbing the proposed building heights.



**5.1.9** The submitted *Daylight/Sunlight Assessment* carried out in conjunction with the design of the subject development demonstrates that the proposed development will not have an undue negative impact on its receiving environment. The proposed development caters for building heights of 7 no. storeys (c. 23m) up to 13 no. storeys (i.e. Block A only, at c. 44.2m, noting that the top floor accommodates an outdoor roof terrace only, not residential accommodation). It is considered that the proposed building heights are appropriate and fully justified in the context of the SPPRs of the UD&BHG. The SPPRs of the UD&BHG, and the proposed development's compliance with same, are detailed in the following sub-sections:

**5.1.10** The UD&BHG contain 4 no. SPPRs with SPPR 1 being as follows:

#### **SPPR 1**

***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.***

**Figure 4** – SPPR 1 of the UD&BHG.

**Development Compliance with SPPR 1:** In accordance with SPPR 1, the proposed development is located on a prominent junction, between Santry Avenue and Swords Road, within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of city and caters for high frequency public transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned at this route. It should also be noted that the subject site is easily accessibility to the M50 / M1 motorways and within 400 metres of a large regional park (Santry Demesne Park).

The proposed development will regenerate / redevelop an underutilised brownfield site, in compliance with the Z3 land use zoning attached to the site. The proposed development is therefore considered to represent an ideal opportunity to provide for increased building heights and densities in order to achieve the objectives of the NPF. Having regard to the foregoing, the proposed development is considered to be fully compliant with SPPR 1 of the UD&BHG and the proposed building heights are justified in this context.

### 5.1.11 SPPR 2 of the UD&BHG is as follows:

#### SPPR 2

*In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans<sup>2</sup> could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.*

Figure 5 - SPPR 2 of the UD&BHG.

**Development Compliance with SPPR 2:** The subject site is zoned Z3 (Neighbourhood Centres) in the existing Dublin City Development Plan 2022-2028 (hereafter CDP). Permissible uses for the Z3 zoning include for, *inter alia*: residential, childcare facility, community facility, creative and artistic enterprises and uses, cultural / recreational building and uses, medical use and related consultants, office, open space, primary health care centre, restaurant, shop (local) and shop (neighbourhood). The CDP's vision for Z3 lands seeks to develop such lands for the provision of local facilities, accessible via walking, with a limited range of services. It is stated in the CDP under the Z3 zoning objective that "Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level".

The proposed development consists of a mixed use scheme comprising 321 no. residential apartments, with non-residential uses located at ground floor level. The proposed non-residential uses consist of 3 no. retail units, a medical suite / GP Practice unit, community/arts & culture space, and a residential amenity use unit. It is therefore considered that the proposed development caters for an appropriate mix of uses, in compliance with SPPR 2 of the UD&BHG, which will enable redevelopment of the subject site to comprehensively meet contemporary social and economic needs. All the proposed non-residential uses are located at ground floor level, fronting onto both Swords Road and Santry Avenue, with some of the proposed community/arts & culture space also addressing the public open spaces, all of which act to promote activity and bring a new vibrancy to the area. In compliance with the Z3 zoning, high density residential development is located alongside and above these non-residential uses.

Having regard to the above, the proposed development is considered to be fully compliant with SPPR 2 of the UD&BHG and the proposed building heights are justified in this context.

## 5.1.12 SPPR 3 of the UD&BHG is as follows:

### SPPR 3

*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 above; 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.*

- (B) *In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority ( where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme*
- (C) *In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.*

Figure 6 - SPPR 3 of the UD&BHG.

**Development Compliance with SPPR 3:** The criteria referenced in part (A) SPPR 3 refers to an assessment at 3 no. scales, being:

- At the scale of the relevant city/town:
- At the scale of district/ neighbourhood/ street:
- At the scale of the site/building:

It is noted that specific assessments may also be required at some or all the above scales to support proposals at some or all of these scales.

The following sections 5.1.12.1 – 5.1.12.3 detail the proposed development's compliance with the aforementioned criteria.

#### **5.1.12.1 Scale of the Relevant City/ Town**

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

The subject site is located on a prominent junction, between Santry Avenue and Swords Road, within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of city and caters for high frequency public



transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned at this route. Dublin Bus operates a frequent service c. every 10 minutes at peak hours. Existing bus stops are also located on Santry Avenue, as well as Swords Road. The subject site is also easily accessibility to the M50/M1 motorways, providing wider connectivity to other public transport options in the city. The site is considered to be very well served by high capacity, frequent, public transport services, with excellent links to the wider Dublin area and therefore compliant with the above criteria.

The subject site benefits from excellent public transport accessibility levels. Dublin Bus operates route numbers 16, 33, 41, 41a, 41b and 41c along the R132 Swords Road corridor, travelling in both directions providing links to Dublin City Centre and Ballinteer to the south and Swords to the north. Further, Dublin Bus Route 27b operates along the R132 Road corridor (to the north east of the subject site) providing links to/from Dublin City Centre and Harristown. The Go-Ahead Ireland bus Route 17a operates along R104 Santry Avenue providing links to/from Blanchardstown and Kilbarrack. All of the above routes are highly accessible with the closest interchange opportunities being within approximately 5m (Routes 17a, 16, 33, 41a, 41b, 41c) of the subject site whilst route numbers 27b are accessible being within 500m of the subject development site as detailed further in Figure 7 below:



Figure 7 - Existing Dublin Bus Routes and Local Interchanges (Source: [www.dublinbus.ie](http://www.dublinbus.ie))

In terms of public transport proposals, it should be noted that BusConnects is an initiative launched by the National Transport Authority with the aim of overhauling the bus system in the Dublin Region. This initiative includes review of bus services, the definition of a core bus network which comprises radial, orbital and regional core bus corridors. It also includes enhancements to ticketing and fare systems as well as transition to a new low emission vehicle fleet.

This initiative in the short-term proposes to implement a redesign of the existing bus network. The fundamental changes to the network expected would be as follows:

- Increasing the overall amount of bus services. Providing new and frequent orbital services connecting more outer parts of the city together;
- Simplifying the bus services on the key radial into “spines” where all buses will operate under a common letter system and buses will run very frequently and be more evenly spaced;
- Increasing the number of routes where buses will come every 15 minutes or less all day;

- The frequent network would become a web-shaped grid, with many interchange opportunities to reach more destination. Everywhere that two frequent routes cross, a fast interchange is possible; and
- Additional service would be provided at peak hours to limit overcrowding.

The proposed development site is also ideally located to benefit from the enhanced accessibility levels that will be delivered by the BusConnects. The subject site will be directly serviced by the following BusConnects proposed routes;

- **Route A2/A4:** will run adjacent to the subject site along the Swords Road and will serve the site with frequency of every 12 minutes in peak period. **A2** will connect the subject site to Airport, City Centre, Ballinteer and Dundrum whereas **A4** connect the site to Swords, City Centre and Nutgrove.
- **Route 22:** will run adjacent to the subject site along the Swords Road and will serve Glen Ellan Road, River Valley and City Centre with a frequency of every 15 minutes.
- **Route N6:** will run along Santry Avenue just opposite the site entrance, with a proposed frequency of 10 minutes. The route provides a connection to **Spine Route E** located within approximately 1.2km west of the site and the future Metrolink stop on Ballymun Road. It also connects the site to Finglas, Santry, Coolock and Donaghmede.

Figure 8 illustrates bus services opportunities in the area and the frequency available for each route on a neutral weekday from the BusConnect redesign:



Figure 8 - Proposed Bus Network (Source: [www.busconnect.ie](http://www.busconnect.ie))

The Bus Network Redesign is the first step in a series of transformative changes to Dublin's bus network over the coming years. However, the next steps in this initiative is the improved infrastructural and operation of the proposed Bus network which includes:

- Building a network of “next generation” bus corridors on the busiest bus lines to make bus journeys faster, predictable and reliable;
- Developing a state-of-the-art ticketing system using credit and debit cards or mobile phones to link with payment accounts and making payment much more convenient;
- Implementing a cashless payment system to vastly speed up passenger boarding times;
- A simpler fare structure, allowing seamless movement between different bus services without financial penalty;
- New bus stops with better signage and information and increasing the provision of additional bus shelters; and
- Transitioning to a new bus fleet using low-emission vehicle technologies.

Figures 9 and 10 illustrate the bus radial and orbital infrastructural corridors to be implemented as part of the BusConnect initiative. In relation to the subject site, the proposed development lies immediately adjacent to radial Core Bus Corridor (CBC) of Swords to the City Centre (C Spine) where bus journey time is anticipated to be 40 minutes along the entire route once constructed. Further the Ballymun City Centre Core Bus Corridor (E Spine) is also located within approximately 1.2km west of the subject site.



Figure 9 - BusConnects Radial Bus Corridor





Figure 10 - BusConnects Orbital Bus Corridor

The MetroLink project is an urban high capacity rail service connecting Swords, Dublin Airport, City Centre and Charlemont with a journey time of approximately 20 mins (between O'Connell St and Dublin Airport) and offering a frequency of up to 30 trains per hour per direction.

The proposed route for the MetroLink near the site is indicated in Figure 11 with the closest interchanges Northwood and Ballymun both located within approximately 1.6km from to the entrance of the subject site.



Figure 11 - Proposed MetroLink Stops near the subject site



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

The proposed development has been designed with careful consideration to the surrounding environs of the site. The tallest element of the scheme (13 storeys - Block A) is located at the corner of the junction, giving a landmark element to the development at this prominent corner location. To the west of Block A, Blocks D & E, as they front onto Santry Avenue, provide for 8 storeys giving strong frontage and definition to the Santry Avenue streetscape, both complimenting and contrasting with the large regional park on the opposite side of the road (Santry Demesne). The locational context of Blocks A, D, & E, adjacent to existing roads and open space, create an ideal opportunity for increased heights which will not be detrimental any existing residential amenity in the vicinity.

To the rear, Blocks B, C & F cater for 7 storeys and are aligned with the permitted 7 storey blocks of the Santry Place development to the south. The proposed setting and heights of Blocks B, C, & F, together with the setting of the proposed public and communal space within the development, provide for full integration between adjoining permitted and proposed developments, allowing for a new, integrated, urban quarter to be developed the junction of Swords Road and Santry Avenue.

To the south-west of the site, the proposed 7 storey height of Block G appropriately addresses the corner of the site and caters for efficient and appropriate use without any detriment to existing residential amenity given the existing uses located to the immediate west / south-west.

At ground floor level, the proposed development provides for 3 no. retail units, a medical suite / GP Practice unit, community/arts & culture space, and a residential amenity use unit. These non-residential uses front onto Swords Road and Santry Avenue, allowing for activity to be promoted along these streetscapes, and are put forward in compliance with the Z3 zoning attached to the site.

A Landscape and Visual Impact Assessment (LVIA) has been prepared by Dermot Foley Landscape Architects and is submitted as part Environmental Impact Assessment Report which accompanies the application – please refer to same for full details. The LVIA considers that the proposed development will have a slightly positive effect on the landscape character and an imperceptible to moderate negative effect on views. *“Effects on the landscape and views will be pronounced during the construction stage, with increased activity, including movement of materials to and from the site, as well as the installation of planting and landscape design along Santry Avenue and Swords Road. As vegetation matures, it will screen some of the Proposed Development and improve the overall quality of the landscape character, particularly along Santry Avenue. Some visual intrusion will remain at the upper floors of the Proposed Development but will not significantly alter the skyline along key views.*

*The effects are not incongruous with the landscape’s current mix of urban land uses or changing character. There already exist buildings of multiple scales and heights as well as multi-storey apartment blocks along Swords Road. Planning permission has also been received in 2019 and 2020 for similar high-density developments. The addition of the Proposed Development’s 21<sup>st</sup> C. high-density apartment blocks is a continuation of the area’s suburban and urban revolution and responds appropriately to the Dublin City Development Plan’s (2022-2028) criteria for proposals of enhanced neighbourhood facilities, height, density, and scale. Replacement of the industrial space and on site is a positive contribution towards an emerging urban landscape character.*



*Finally, the proposed public open space and communal amenity space will also complement the existing green space at Santry Demesne as well as positively contribute to the biodiversity, habitats, and amenity spaces along Swords Road and Santry Avenue”.*

Furthermore, CGI's and verified views have been prepared by 3D Design Bureau and are also submitted with the application. The CGI's and verified views are considered to fully demonstrate that the proposed building heights will positively contribute to the area, appropriately addressing the corner location of the site, and protecting key views.

It is considered that the proposed development will make a positive contribution to the public realm / character of the area, improving the existing scenario by transforming an underutilised brownfield site in private commercial use into a high quality, residentially led, mix-use development, which will improve the visual attractiveness of the area, and cater for a wider variety of uses. It is therefore considered that the proposed development is compliant with the above criteria.

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

The proposed development has been designed to address the existing streetscapes of both Swords Road and Santry Avenue. Activity is promoted at ground floor level of the blocks through the provision of retail uses, as well as community / arts / cultural uses etc. fronting onto these surrounding roads, which will provide for local and community services and facilities, thereby creating a sense of place and vibrancy.

The vehicular accesses to the development are put forward with cognisance to the already permitted vehicular accesses for the Santry Place development (granted under Dublin City Council Ref. 2713/17), with the internal road network being located to the west and south of the blocks in order to ensure that the development is not dominated by vehicles, which again aids the creation of a sense of place within the development.

The proposed layout has been carefully considered to allow for integration of proposed public and communal open spaces with the adjoining permitted public and communal open spaces for the Santry Place development to the south. The centrally located public open space for the development also allows for connectivity to Santry Demesne to the north of the site.

The proposed development provides for a variety in massing and height which addresses the contextual location of the site and its surrounding environs, placing the tallest element of the scheme at the junction of Swords Road and Santry Avenue, with strong urban form addressing the large Santry Demesne Park to the north. To the rear, the heights of Blocks B, C, F, & G correspond with the permitted 7 storey heights at Santry Place. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

### **5.1.12.2 Scale of the District / Neighbourhood / Street**

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

The proposed development caters for buildings which range in height from 7 no. storeys to 13 no. storeys. The range in building heights takes account of the surrounding environs of the site. The tallest element of the development (Block A) is put forward to address the corner setting of the site and provide for a landmark element to the proposed scheme. It is considered that the nature / size of the existing road junction, together with the large regional park to the immediate north (Santry Demesne) and the small area of open space to the north-east at Santry Villas, allows for the proposed 13 storey height of Block A to be easily accommodated without any detriment to existing amenity.

To the west of Block A, the 8 storey Blocks D & E create definition to the Santry Avenue streetscape and provide for a visually pleasant juxtaposition with Santry Demesne to the north. To the rear, 7 storey heights are catered for in Blocks B, C, F & G to allow for integration with the permitted 7 storey Santry Place development to the south.

The proposed layout has carefully considered the location of proposed public and communal open spaces to allow for coherent development of the site through the integration of proposed public and communal open spaces with the permitted public and communal open spaces of Santry Place.

It is considered that the proposed development, through its layout, design and mix of uses, caters for a sense of place which will make a positive contribution to the existing urban neighbourhood and streetscape, and is therefore considered to be compliant with the above criteria.

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

The proposed development consists of 4 no. buildings, sub-divided into 7 no. blocks. The proposed layout has been informed by the nature of the existing streets surrounding the site and the layout of the permitted Santry Place development to the south. The proposed block layout allows for an ample provision of public and communal open space which will be aligned / integrated with the permitted public and communal open space of Santry Place, allowing for a greater sense of openness and space to be created between the blocks.

At ground floor level, 3 no. retail units, a medical suite / GP Practice unit, community/arts & culture space, and a residential amenity use unit are catered for in Blocks A, B, C, D E & F, with a residential amenity use also proposed to be located between Blocks A & D. These non-residential elements address the existing Santry Avenue and Swords Road streetscapes, bringing activity and vibrancy to the street, and avoiding long uninterrupted walls at street level. Private amenity spaces for the proposed apartments, in the form of terraces at ground floor level and balconies on the upper floors, also ensure activity and passive surveillance throughout the proposed scheme.

The proposed development caters for an appropriate range in building heights put forward in response to the surrounding environs, as previously detailed. The variation in the building heights provides for visual interest and avoids a monolithic visual appearance. The proposed materials and finishes are considered to ensure a high architectural standard is put forward and are consistent with the surrounding developments and material palette in the locality. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.





***“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).”***

It is considered that the proposed development enhances the urban design context for public spaces by catering for new public and communal open spaces in accordance with the required standards of the existing CDP and the relevant Section 28 Ministerial Guidelines. Public and communal open space, and indeed the proposed block layout, has been strategically designed to allow for integration with the permitted public and communal open spaces at Santry Place to the south, creating a greater sense of openness at an appropriate scale. The proposed centrally located public open space provision for the development allows for easy navigation to / from Santry Demesne to the north.

It is considered that the development further contributes to enhancing the overall character and quality of the public realm by catering for a more efficient use of the site subject and creating an animation at ground floor with generous setbacks from the roadway, to allow for the creation of an enhanced public realm.

The proposed development has been subject to a Site Specific Flood Risk Assessment in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).” The Site Specific Flood Risk Assessment has been prepared by DBFL Consulting Engineers and is enclosed with the application as a separate document – please refer to same for further details. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

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

In its existing state, the subject site is in private use by Chadwicks Builders Merchants and is currently fenced off from the public, with the existing boundary to the Swords Road comprising a steel fence and mature hedging and the boundary to Santry Avenue consisting of a low wall with a steel fence on top.

It is considered that the proposed development will significantly enhance the existing public realm and street frontage by opening up to the site for new, residentially led, mix use development. The provision of ground floor active uses within the development caters for a strong urban design character and will bring a new vibrancy to both Swords Road and Santry Avenue. The development also significantly improves the pedestrian quality of these streetscapes and creates a more appropriate use by providing active retail /commercial uses at ground level with high quality residential accommodation on the upper levels.

The proposed blocks are arranged in a north-south orientation, allowing the development to fully integrate with the Santry Place development to the south, and for pedestrians / cyclists to easily navigate their way from Santry Demesne to the north through the proposed development and into Santry Place to the south. The proposed pedestrian routes through the site are considered to create new connections for the existing residents of the area which promote more sustainable modes of transport such as walking and cycling. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.





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

The proposed development provides for a mix of uses which include for 321 no. residential dwellings, 3 no. retail units, a medical suite / GP Practice unit, a residential amenity use unit, and c. 1,460sq.m of floor space to accommodate community/arts/cultural uses. The proposed mix of uses is considered to be appropriate and compliant with the Z3 zoning attached to the site which seeks to cater for a variety of convenience type units at ground floor level, with high density residential development above. It is considered that the development will significantly increase variety and choice in the area.

Paragraph 3.6 of the UD&BHG states that *“development should include an effective mix of 2, 3 and 4 storey development which integrates well into existing and historical neighbourhoods and **4 storeys or more** can be accommodated alongside existing larger buildings, trees and parkland, river/ sea frontage and along wider streets”* [Our emphasis added].

The proposed development provides for a range of building heights adjacent to the Swords Road QBC and within walking distance to a large regional park (Santry Demesne). It is considered that the existing nature of the junction at Swords Road and Santry Avenue, which is of a large size, is more than capable of supporting taller buildings. In addition, immediately to the south of the subject site is the permitted 7 storey Santry Place development and it is therefore considered that the proposed development will integrate into its surroundings in an appropriate manner. The proposed development is therefore considered to be in accordance with the parameters for achieving 4 no. storeys or more in accordance with paragraph 3.6 above of the UD&BHG. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

#### **5.1.12.3 Scale of Site / Building**

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

A daylight / sunlight assessment for the proposed development has been prepared by Chris Shackleton Consulting and is submitted as a separate document – for further details please refer to same. The enclosed assessment addresses the availability, quality, and receipt of light within the development, including for access to adequate sunlight / daylight within the proposed public and communal open spaces. Initial designs of the proposed development were altered to appropriately accommodate required changes as recommended by initial feedback received from the daylight / sunlight assessment. It is considered that, given the surrounding context and orientation of the site, overshadowing and loss of light to existing residential amenity will be negligible. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

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

**&**

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

CS Consulting has prepared the submitted Daylight and Sunlight Assessment of the proposed development – please refer to same. The submitted assessment states that **94%** of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested (97% if we include marginal results). The results as presented represent worst cast results for the two lowest floors. The average compliant areas achieving the relevant target Lx for (i) all bedrooms is **95%**, (ii) all Living/Kitchen spaces **80%** - both are well in excess of the required 50%.

The submitted assessment finds that for sunlight to rooms: **86%** of Living rooms receive 1.5hrs of sunlight on the test day of the 21<sup>st</sup> March (this increases to 90% if marginal results are included). This is consistent with the BRE defined “careful layout design” 80% target.

For Sunlight on the Ground SOG (Shadow) **100%** of the new provided communal and public amenity spaces pass the BRE requirement. There is considerable overprovision of amenity space. The tested spaces comply with the requirements of the BRE guidelines in relation to shadow. Please see Architects comments on alternative, compensatory design solutions relating to light.

The submitted assessment states that *“the application generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BR209 - 2022) when considered in terms of this infill and regeneration project in an un-developed lot”*.

The submitted assessment has also considered the impact on neighbours and finds that non-residential buildings sit to the West, North and East of the proposal and do not require testing. Phase 1 Santry Place sits to the South of this Phase 2 proposal. Sunlight to amenity and windows of the granted Santry Place cannot be impacted by this current proposal as it sits to the North. In relation to skylight (VSC) this LRD proposal is a mirrored development of the permitted and constructed Santy Place. Any impact along the closer facades will therefore be compliant with the guidelines. The impact of the proposed development is indistinguishable and therefore compliant with BRE guidelines.

In addition, the submitted assessment states that **100%** of the new provided communal and public amenity spaces pass the BRE requirement. There is considerable overprovision of amenity space. The tested spaces comply with the requirements of the BRE guidelines in relation to shadow.

We note from the previous SHD application, under Ref. ABP-310910-21, that in his assessment of daylight / sunlight, the An Bord Pleanála Inspector stated the following in relation to daylighting to the proposed units: *“I consider that the design team have maximised access to daylight and sunlight for apartments and am satisfied that all of the rooms within the apartments would receive adequate daylight. The limited extent of non-compliance with the strict standards set out in BRE guidance is acceptable, having regard to the predicted values, the central / accessible urban location and compliance with national and local planning policy in respect of the redevelopment of such brownfields sites. I consider that the identified compensatory measures are acceptable and will ensure the achievement of satisfactory levels of residential amenity”*.

In relation to sunlight, the Inspector stated: *“it is considered that the development achieves acceptable levels of residential amenity having regard to the increasing levels of sunlight at upper floors levels, the levels of daylighting achieved across the development and the sunlight values achieved for public, communal and private open spaces”*.



In relation to Shadow/Sunlight - Gardens and Open spaces, The Inspector stated: *"I consider that the scheme provides a satisfactory standard of residential amenity for a higher density scheme in an inner urban area".*

Given the similarities between the aforementioned SHD development proposal and the current development proposals, but taking into account the reduction in building heights, and updated submitted assessment, it is considered that the proposed development is appropriate in terms of daylight and sunlight.

#### **5.1.12.4 Specific Assessments at Some or All of the Scales**

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

B-Fluid has prepared the submitted Wind Microclimate Modelling which has been carried out to identify the possible wind patterns around the area proposed, under mean and peak wind conditions typically occurring in Dublin, and also to assess impacts of the wind on pedestrian levels of comfort/distress. The results of this wind microclimate study are utilized by the design team to configure the optimal layout for Santry Avenue LRD for the aim of achieving a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian) and not to introduce any critical wind impact on the surrounding areas and on the existing buildings.

The evaluation of the proposed scenario indicates that the planned development aligns with the Lawson Comfort Criteria, confirming that no areas are unsafe and the proposed development does not create conditions of distress. All the ground amenities outlined in the report can be utilized according to their intended scope.

The analysis of wind speed results and Lawson map at a height of 1.5 meters above the terrace reveals that all terraces are suitable for sitting/standing. It is important to note that fluctuations in velocity on rooftop terraces may lead to door slamming issues. Therefore, it is recommended to consider such conditions in terrace design. Possible means of reducing the risk of door slamming include installing door actuators, using automatic or sliding doors, etc.

The following mitigation measures will be implemented to further improve pedestrian comfort around the development:

- *Preserving the existing trees along the walkway on west and east sides of the development:* The presence of these existing trees along the walkway enhances the comfort for pedestrians.
- *Introducing additional trees and hedges on ground amenities of the development:* These additional plants will help reduce wind speed, increasing comfort levels in all ground amenities of the development.

The solid balustrades of balconies are acting as wind barriers, helping to reduce the impact of wind. This shows that the balconies are designed with considerations for prevailing wind directions.

The balconies also function as windbreaks, providing additional shelter to pedestrians by blocking or reducing the downwash or corner effects of wind that arrives at ground level.

As a result of the proposed development construction, the wind on the surrounding urban context remains suitable for the intended use when compared with the baseline situation.



The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for “Frail persons or cyclists” and for members of the “General Public” in the surrounding of the development.

Therefore, the CFD study carried out has shown that under the assumed wind conditions typically occurring within Dublin for the past 15 years:

- The development is designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian).
- The development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads.

Given the current proposal is of a similar layout and block position as the previous SHD proposal, but with lower heights, it is considered that the current proposal will not have any critical impact on the surrounding buildings, or nearby adjacent roads, and that the proposed development will have a beneficial effect on the surrounding wind microclimate and create comfortable pedestrian areas and public spaces. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

***“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.”***

As part of the accompanying Environmental Impact Assessment Report (EIAR), Chapter 5 of same “Biodiversity” provides details of the ecological impact assessment of the proposed development undertaken and asserts that a detailed desk study, in combination with a suite of field surveys, was carried out regarding the proposed development. Field surveys included: habitat/flora (including invasive plants) surveys, mammal surveys, bird scoping surveys, and bat surveys.

Bat surveys and assessments were conducted on the subject site in 2021 concluded that the site itself is considered to be of negligible importance for bats. No bats were recorded during the bat activity survey in 2021, the site lacks mature trees and commuting and foraging routes, and the buildings on site lack roosting suitability for bats. The Site is also deemed unsuitable for bats due to isolated nature in an urban context and existing high light levels on site.

The Site is considered to be of local importance to breeding birds due to the potential for Herring Gull, an amber-listed species, to nest on the warehouse roof. However, due to the distance from any Natura 2000 site designated for Herring Gull and the abundance of similar nesting surfaces in the vicinity, the Site is not considered to be an important *ex-situ* site for wintering birds. Green-listed bird species noted on Site may breed in the limited hedgerow habitats on Site.

The Biodiversity chapter of the submitted EIAR concludes that *“provided the mitigation measures proposed within this Chapter together with all best practice development standards as outlined in the CEMP are carried out in full, there will be no significant negative impact to any KER [Key Ecological Receptors] habitat, species group or biodiversity as a result of the Proposed Development. The targeted ecological surveys allowed for the identification of the relevant KERs at the Site, and through careful evaluation of the potential impacts it is considered that a proportionate and effective solution to mitigate the negative impacts for each has been achieved. Additionally, the landscaping plan for the Proposed Development will inherently offset any loss of the existing poor quality habitat that will result from the Proposed Development, and will provide a net increase in biodiversity value at the Site; through the provision of an increased variety of native and non-native*



*vegetation planting at the Site, along with specific enhancement measures such as the Swift bricks included along the elevations of some of the blocks”.*

Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

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

Microwave links that will require the Applicant to make specific allowances for their retention (“Mitigation Measures”) have not been identified. No Radio Frequency links that will require the Applicant to make specific allowances for their retention have been identified.

No Telecommunication Channels were identified that would as a consequence of the height and scale of the proposed development, require specific mitigation measures in order to retain them. It is recommended to and accepted by the Applicant, to provide a dedicated allocation of space at and on the Lift Shaft overrun together with access to a power supply, where steel support structures can be fixed at a future date, if required, to provide necessary mitigation measures should retention of any Microwave links be required (subject to planning permission if applicable). It is therefore concluded that the proposal being made by the Applicant allows for the retention of important Telecommunication Channels, such as Microwave links, to satisfy the criteria of Section 3.2 of the Building Height Guidelines (2018). Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

***“An assessment that the proposal maintains safe air navigation.”***

As part of the current SHD application for the subject site (Ref. ABP-314019-22), both the Irish Aviation Authority and the Dublin Airport Operator were sent a copy of the application for their consideration. It is considered that upon a grant of permission for the current proposal, the applicant will consult directly with the Irish Aviation Authority and / or the Dublin Airport Operator regarding the utilisation of cranes to ensure safe air navigation. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

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

An Architectural Design Statement has been prepared by Davey & Smith Architects and is enclosed with the application as separate document – please refer to same for further details. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria.

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

The proposed development has been subject to an AA Screening prepared by Enviroguide Consulting. The AA screening concludes that *“on the basis of objective information; the possibility **may be excluded** that the Proposed Development will have a significant effect on the European sites listed below:*

- *North Dublin Bay SAC (000206)*
- *South Dublin Bay SAC (001266)*
- *North Bull Island SPA (004006)*
- *North-west Irish Sea SPA (004236)*
- *South Dublin Bay and River Tolka Estuary SPA (004024)*



*The screening exercise above used the best available scientific knowledge and objective information to assess potential impacts to European sites arising from the project itself or in combination with other plans and projects. Based on this assessment, and in light of these sites' conservation objectives, the possibility of any likely significant effects on the above listed European sites **may be excluded**. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process and the preparation of an NIS is not required".*

The proposed development has also been subject to a comprehensive Environmental Impact Assessment Report (EIAR). The EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate. For full details please refer to the EIAR which accompanies the application. Given all the foregoing, it is considered that the proposed development is compliant with the above criteria and therefore the proposed building heights are justified in this context.

#### 5.1.13 SPPR 4 of the UD&BHG is as follows:

##### SPPR 4

***It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:***

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;***
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and***
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.***

**Figure 12 - SPPR 4 of the UD&BHG.**

The proposed development caters for 321 no. dwellings on a site measuring c. 1.5 hectares. The development therefore puts forward a proposed gross and net density of c. 214 dwellings per hectare.

We note that as of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities replaced the previous Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

In the context of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) the application site can be considered a 'Brownfield' or 'Public transport corridor' site. In relation to brownfield sites, the guidelines state that higher densities should be promoted subject to appropriate safeguards, while in relation to public transport corridors the guidelines state that:



*“In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors”.*

However, under the Sustainable Residential Development and Compact Settlements Guidelines (2024) (and as per Appendix A of same) the application site can be considered a “Brownfield” site or to be “Transport Oriented Development”. Furthermore, under section 3.4 “Refining Density” of the aforementioned new Guidelines, it is stated that *“the density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment (Figure 3.3 refers)”*.

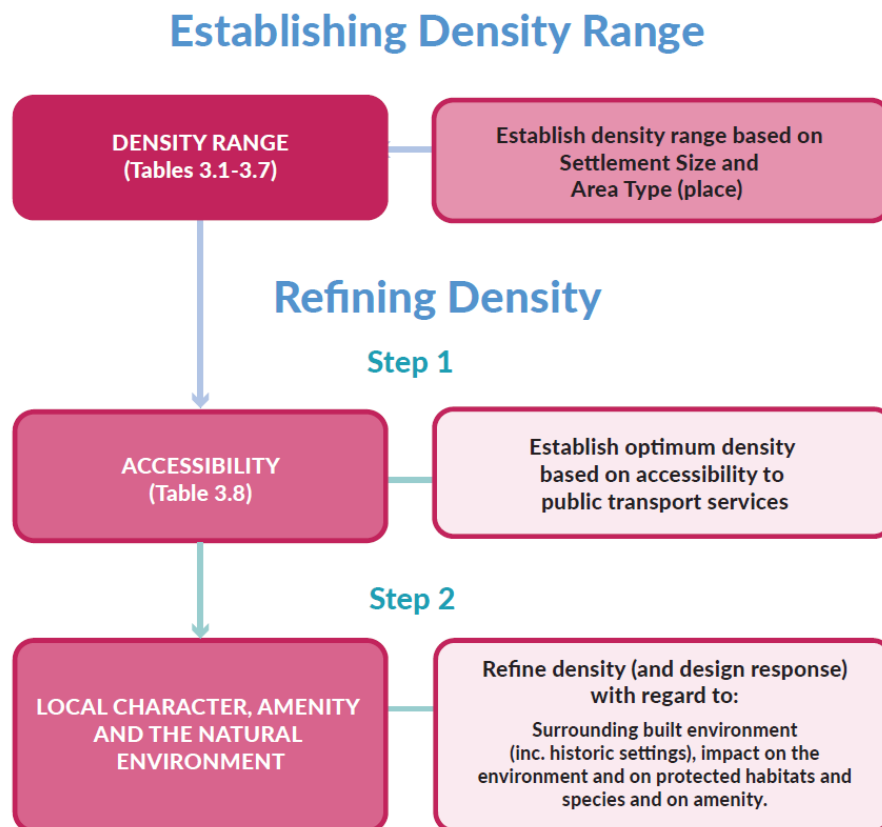


Figure 13 – Extract of Figure 3.3 “Illustration of the process for establishing, optimising and refining appropriate density for a plan or development” from 2024 Sustainable Residential Development and Compact Settlements Guidelines.

Under Table 3.1 of the new Guidelines, “Areas and Density Ranges Dublin and Cork City and Suburbs”, the subject site can be described as “City – Urban Neighbourhoods”: *“The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) **lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area.** These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork”* [Our emphasis added].

Referring back to section 3.4 “Refining Density” which includes Table 3.8 “Accessibility” of the new Guidelines, the following is stated “*planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area*”. It goes on to state: “*Densities above the ranges are ‘open for consideration’ at accessible suburban and urban extension locations to the maximum set out in Section 3.3. Table 3.8 sets out definitions for terms used to define accessibility to allow for consistent application*”.

**Table 3.8: Accessibility**

|   |
|---|
| <p><b>High Capacity Public Transport Node or Interchange</b></p> <ul style="list-style-type: none"> <li>• Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail<sup>11</sup>, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’<sup>12</sup> stop.</li> <li>• Highest densities should be applied at the node or interchange and decrease with distance.</li> <li>• ‘Planned public transport’ in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.</li> </ul> |
| <p><b>Accessible Location</b></p> <ul style="list-style-type: none"> <li>• Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.</li> </ul>   |

**Figure 14 – Extract of Table 3.8 “Accessibility” from 2024 Sustainable Residential Development and Compact Settlements Guidelines.**

Taking into account the foregoing guidance set out by the recently published 2024 Sustainable Residential Development and Compact Settlements Guidelines, the proposed development, located adjacent to a high quality public transport corridor, that has existing and planned capacity to cater for the proposed quantum of housing, and puts forward a proposed gross and net density of c. 214 dwellings per hectare and therefore secures the minimum densities required for such a site as detailed in aforementioned guidelines. The proposed development also secures an appropriate mix of building heights and avoids mono-type building typologies. It is therefore considered that the proposed development is compliant with SPPR 4 of the UD&BHG and that the proposed building heights are justified in this context.

#### 5.1.14 Conclusion on UD&BHG

It is respectfully submitted that, given all the foregoing in Section 4.1 of this Statement, the proposed development is fully compliant with all the SPPRs and stated criteria of the UD&BHG and therefore the proposed building heights of 7 no. to 13 no. storeys are fully justified in the context of the national and regional policy. As such, having regard to the development’s compliance with the SPPRs of the UD&BHG, the proposed development ought to be granted permission so that the application site can be appropriately and efficiently development in compliance with the objectives of the NPF.

## 5.2 Sustainable Urban Housing: Design Standards for New Apartments (2023)

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and have been subsequently updated in in respect of Shared Accommodation and “Build-to-Rent” developments, with the most up to date version of these guidelines being the July 2023 version.

The Sustainable Urban Housing Design Standards for New Apartments Guidelines (hereafter “Apartment Guidelines”) are supported by legislation which introduces powers whereby the Minister may expressly state Specific Planning Policy Requirements (SPPRs) which must be applied by planning authorities, or An Bord Pleanála, in the exercise of their functions.

Where specific planning policy requirements are stated in the Guidelines, the Minister intends that such requirements must take precedence over policies and objectives of development plans, local area plans or SDZ planning schemes.

The 2020 Apartment Guidelines specify SPPRs for:

- Unit Mix
- Gross Floor Areas
- Dual Aspect Ratios
- Floor to Ceiling Heights
- Apartments to Stair/Lift Core Ratio
- Build to Rent Developments
- Shared Accommodation / Co-Living Developments

The Apartment Guidelines also detail the requirements for the following:

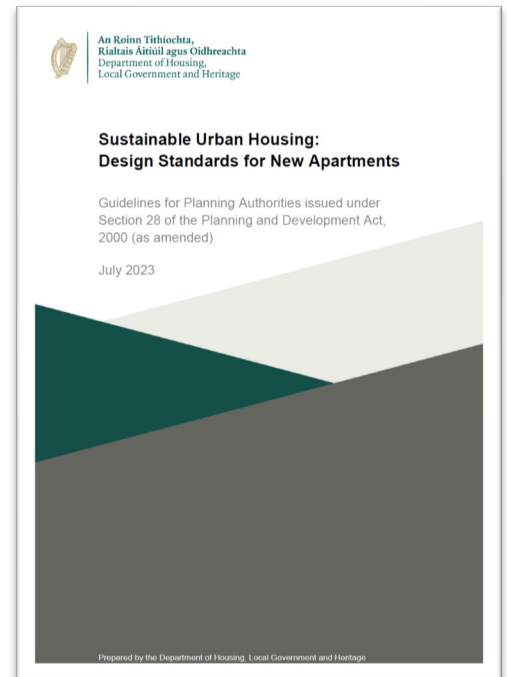
- Internal Space/Room Standards
- Storage Spaces
- Private Amenity Spaces including Balconies / Terraces
- Communal Amenity Space
- Car & Bicycle Parking
- Children’s Play Areas

Section 6.13 of the 2023 Apartment Guidelines states that a Building Lifecycle Report shall be submitted with a planning application for apartment development.

### 5.2.1 Statement of Consistency with the Sustainable Urban Housing: Design Standards for New Apartments

In accordance with Section 6.12 of the Apartment Guidelines, a Building Lifecycle Report is submitted as part of this proposed development.

The proposed development is accompanied by a detailed Housing Quality Assessment (hereafter “HQA”), prepared by Armstrong Fenton Associates, which is submitted as a separate standalone document. The





accompanying HQA demonstrates the proposed development's compliance with relevant quantitative standards for new apartment developments detailed in the Apartment Guidelines. The application drawings, prepared by Davey & Smith Architects, also demonstrate that the proposed internal floor areas, rooms sizes, private amenity spaces etc. are in compliance with the standards of the Apartment Guidelines.

The Apartment Guidelines emphasise the importance of, and the need to appropriately develop, strategic sites in urban areas in close proximity to existing public transport facilities. The Apartment Guidelines identify locations in cities and towns that may be suitable for apartment development as follows:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

Within this locational context, the subject site is considered to be a '*Central and/or Accessible Urban Location*', and this was acknowledged by the An Bord Pleanála Inspector in his assessment of previous SHD application submitted under Ref. ABP-310910-21. The Apartment Guidelines note that such locations are generally suitable for large scale apartment development and higher density developments. These locations are categorised as including the following:

- Sites within walking distances (i.e. up to 15 minutes or 1,000-1500m), of principle city centres or significant employment locations, that may include hospitals and third-level institutions;
- Sites within reasonable walking distance (i.e. up to 10 minutes or 800m) to/from high capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (i.e. min 10-minute peak hour frequency) urban bus services.

The proposed development is located adjacent to the Swords Road QBC and the proposed BusConnects Corridor. Dublin Bus currently operate a high frequency service on this route (c. every 10 mins at peak hours). Existing bus stops are located in close proximity to the site on both Swords Road and Santry Avenue. The site is also easily accessible to the M50 / M1 motorways and Dublin Airport. It is clear that the site falls into the category of a '*Central and/or Accessible Urban Location*' and is therefore suitable for the development of a high density apartment scheme.

The proposed development has been subject to a Traffic & Transport Assessment (TTA) prepared by DBFL Consulting Engineers which is submitted as a separate document – please refer to same for further details. The submitted TTA asserts that the proposed development site is located in a highly accessible area in Dublin, asserting the following:

- *A comprehensive range of high frequency bus services, operated by Dublin Bus and Go-Ahead along both Swords Rd QBC and Santry Avenue, which have interchanges located within a convenient short walking distance of the subject site enhance the sustainability credentials of the subject site.*
- *The proposed development will benefit from enhanced public transport accessibility levels as part of the NTA's BusConnects proposals. The site is located adjoining Radial Spine (A Spine bus services) of the BusConnects and Core Bus Corridors (no. 2 Swords to/from City Centre) proposals. The proposed development has been found to not impinge upon the NTA's emerging CBC infrastructure proposals along Swords Road.*

The site is therefore considered to be very well served by high capacity, frequent, public transport services, with excellent links to the wider Dublin area and compliant with the above criteria and it is clear that the proposed development site falls into the category of a '*Central and/or Accessible Urban Location*' as defined by the



Apartment Guidelines and is therefore suitable for the development of a high density apartment scheme.

The Apartment Guidelines also note that the scale and extent of new developments should increase where the site is strategically located near quality public transport hubs, services, and urban amenities:

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

In this regard it is notable that the proposed development is located in a well serviced built up urban area. The subject site is immediately south of Santry Demesne regional park which provides for a significant public amenity space. Santry Avenue Industrial Estate is located to the west, while St. John’s Court Office Park and Santry Hall Industrial Estate are located to the south and southwest. There are a number of industrial based business uses operating around Dublin Airport to the north. Furthermore, the Omni Shopping Centre is located approximately 600 meters to the south of the subject site. It is our understanding that the Omni Shopping Centre includes for c. 103 no. retail units (c. 45,000 sq.m total). All of these aforementioned areas provide for ample employment opportunities in the vicinity of the development site. It is therefore considered that the development is suitable for increased heights and increased densities in accordance with the objectives of the Apartment Guidelines.

In relation to Central and/or Accessible Urban Locations’, the Apartment Guidelines state:

*“the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.”*

This directive of the Apartment Guidelines includes for site’s *“within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services.”*

The proposed development provides for 204 no. car parking spaces which results in a ratio of c.0.63 spaces per dwelling, which is considered to be appropriate given the locational context of the application site and the availability of existing public transport options in the immediate vicinity.

**4.2.2** A summary of the proposed development’s compliance with the specific planning policy requirements (SPPRs) of the Apartment Guidelines is detailed in the following sub-sections.

### **SPPR 1 of the Apartment Guidelines**

SPPR 1 of the Apartment Guidelines states that:

*“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).”*

**Proposed Development's Consistency with SPPR 1 of the 2023 Apartment Guidelines**

The proposed development includes for 102 no. 1 bed dwellings, representing c. 32% of the total number of proposed dwellings. The proposed development is therefore in compliance with SPPR 1 of the Apartment Guidelines.

The residential element of the development consists of 321no. apartments comprised of the following mix of dwellings:

- 104 no. 1 bed dwellings,
- 198 no. 2 bed dwellings,
- 19 no. 3 bed dwellings.

Table 2 details a breakdown of the proposed residential mix:

| Block        | Total No. of Dwellings | No. 1 beds | %1 beds    | No. 2 beds | % 2 beds   | No. 3 beds | % 3 beds  | Total %     |
|--------------|------------------------|------------|------------|------------|------------|------------|-----------|-------------|
| A            | 51                     | 22         | 43%        | 23         | 45%        | 6          | 12%       | 100%        |
| B            | 38                     | 6          | 16%        | 26         | 68%        | 6          | 16%       | 100%        |
| C            | 53                     | 14         | 26%        | 39         | 74%        | 0          | 0%        | 100%        |
| D            | 44                     | 22         | 50%        | 15         | 34%        | 7          | 16%       | 100%        |
| E            | 49                     | 7          | 14%        | 42         | 86%        | 0          | 0%        | 100%        |
| F            | 52                     | 13         | 25%        | 39         | 75%        | 0          | 0%        | 100%        |
| G            | 34                     | 20         | 59%        | 14         | 41%        | 0          | 0%        | 100%        |
| <b>Total</b> | <b>321</b>             | <b>104</b> | <b>32%</b> | <b>198</b> | <b>62%</b> | <b>19</b>  | <b>6%</b> | <b>100%</b> |

**Table 2 – Proposed Dwelling Mix**

We also note that the Development Plan contains a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process which states that two sub areas were identified for sub-city level HNDA analysis; (i) the Liberties and (ii) the North Inner City. The subject site is not located in either of the aforementioned sub areas and therefor SPPR1 is applicable to the subject site.

**SPPR 2 of the Apartment Guidelines**

SPPR 2 of the 2022 Apartment Guidelines states that:

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





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

*All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development."*

### **Proposed Development's Consistency with SPPR 2 of the 2023 Apartment Guidelines**

SPPR 2 of the Apartment Guidelines states for new developments of 50 or more dwellings, SPPR 1 shall apply to the entire development. As stated previously, the proposed development is compliant with SPPR 1 of the Apartment Guidelines and is therefore considered compliant with SPPR 2 of the Apartment Guidelines.

### **SPPR 3 of the Apartment Guidelines**

SPPR 3 of the Apartment Guidelines states:

*"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"*

### **Proposed Development's Consistency with SPPR 3 of the 2023 Apartment Guidelines**

All of the proposed dwellings meet with and/or exceed these minimum floor areas stated in the Apartment Guidelines, as detailed in the submitted HQA which is submitted as a separate document – please refer to same for details.

We also note that the Apartment Guidelines (in Section 3.6) state that Planning Authorities may also consider a two-bedroom apartment to accommodate 3 persons, with a minimum floor area of 63 sq.m, and go on to state (in Section 3.7) that, in relation to providing variety in dwelling size, it would not be desirable if more than 10% of the total number of units in any private residential development are comprised of two-bedroom three-person units. To that end, the proposed development includes 6 no. 2 bedroom / 3 person units which equates to c. 2% of the overall mix (all located in Block C).

As detailed in the submitted HQA all of the proposed 2 bed / 3 person units meet with and/or exceed the minimum 63 sq.m floor area stated in the Apartment Guidelines for such units.

The proposed development is compliant with SPPR 3 of the Apartment Guidelines.

### **SPPR 4 of the Apartment Guidelines**

SPPR 4 of the Apartment Guidelines states:

*“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 in.*
- (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.*

*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.”*

### **Proposed Development’s Consistency with SPPR 4 of the 2023 Apartment Guidelines**

As previously stated in this Statement, the application site is considered to be a more central and accessible urban location given that the site is located adjacent to existing high frequency public transport (Swords Road QBC).

SPPR 4 of the Apartment Guidelines states that it is a requirement to deliver at least 33% of proposed units as dual aspect units at such locations. Table 3 below, sets out the quantum and percentage of single, dual and triple aspect units within the proposed development.

| Block        | No. Single Aspect Units | % Single Aspect Units | No. Dual Aspect Units | % Dual Aspect Units | No. Triple Aspect Units | % Triple Aspect Units | Total No. Units |
|--------------|-------------------------|-----------------------|-----------------------|---------------------|-------------------------|-----------------------|-----------------|
| A            | 13                      | 25%                   | 38                    | 75%                 | 0                       | 0%                    | 51              |
| B            | 20                      | 54%                   | 18                    | 46%                 | 0                       | 0%                    | 38              |
| C            | 33                      | 62%                   | 20                    | 38%                 | 0                       | 0%                    | 53              |
| D            | 23                      | 52%                   | 21                    | 48%                 | 0                       | 0%                    | 44              |
| E            | 28                      | 57%                   | 21                    | 43%                 | 0                       | 0%                    | 49              |
| F            | 32                      | 62%                   | 20                    | 38%                 | 0                       | 0%                    | 52              |
| G            | 13                      | 38%                   | 15                    | 44%                 | 6                       | 18%                   | 34              |
| <b>Total</b> | <b>162</b>              | <b>50%</b>            | <b>153</b>            | <b>48%</b>          | <b>6</b>                | <b>2%</b>             | <b>321</b>      |

**Table 3 – Proposed Residential Aspect.**

It is evident from Table 3 above that the proposed development is compliant with SPPR 4 of the Apartment Guidelines with 48% of the proposed dwellings being dual aspect units, with an additional 2% of the units being triple aspect. The submitted HQA also details which units are considered to be dual aspect and which units are considered to be single aspect. The proposed development is therefore compliant with SPPR 4 of the Apartment Guidelines.



### **SPPR 5 of the Apartment Guidelines**

SPPR 5 of the Apartment Guidelines states:

*“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.”*

### **Proposed Development’s Consistency with SPPR 5 of the 2023 Apartment Guidelines**

As detailed on the relevant, submitted drawings for each individual block prepared by Davey+Smith Architects, the proposed development complies with SPPR 5 of the Apartment Guidelines.

### **SPPR 6 of the Apartment Guidelines**

SPPR 6 of the Apartment Guidelines states:

*“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, subject to overall design quality and compliance with building regulations.”*

### **Proposed Development’s Consistency with SPPR 6 of the 2023 Apartment Guidelines**

The maximum no. of units proposed per core per block is as follows:

- **Block A:** 5 no. units per floor per core
- **Block B:** 6 no. units per floor per core
- **Block C:** 8 no. units per floor per core
- **Block D:** 6 no. units per floor per core
- **Block E:** 7 no. units per floor per core
- **Block F:** 8 no. units per floor per core
- **Block G:** 5 no. units per floor per core

The proposed development is compliant with SPPR 6 of the Apartment Guidelines.

### **SPPR 7 of the Apartment Guidelines**

SPPR 7 of the Apartment Guidelines states:

*“BTR development must be:*

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



- (b) *Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:*
- (i) *Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.*
- (ii) *Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.”*

### **Proposed Development’s Consistency with SPPR 7 of the 2023 Apartment Guidelines**

The subject development put forward for permission is a conventional apartment scheme i.e., **it is not a ‘Built to Rent’ scheme**, therefore SPPR 7 of the Apartment Guidelines does not apply to the proposed development.

### **SPPR 8 of the Apartment Guidelines**

SPPR 8 of the Apartment Guidelines states:

*“For proposals that qualify as specific BTR development in accordance with SPPR 7:*

- (i) *No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*
- (ii) *Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;*
- (iii) *There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.*
- (iv) *The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
- (v) *The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.”*

### **Proposed Development’s Consistency with SPPR 8 of the 2023 Apartment Guidelines**

The subject development put forward for permission is a conventional apartment scheme i.e., **it is not a ‘Built to Rent’ scheme**, therefore SPPR 8 of the Apartment Guidelines does not apply to the proposed development.





### **SPPR 9 of the Apartment Guidelines**

SPPR 9 of the Apartment Guidelines states:

*“There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either: -*

- (i) required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or,*
- (ii) on the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits.”*

### **Proposed Development’s Consistency with SPPR 9 of the 2023 Apartment Guidelines**

The subject development put forward for permission is a conventional apartment scheme i.e., **it is not a ‘Shared Accommodation / Co-Living’ scheme**, therefore SPPR 9 of the Apartment Guidelines does not apply to the proposed development.

In addition to the above SPPRs, the 2023 Apartment Guidelines also set out directives in relation various other design recommendations and standards. These are detailed in the following pages along with the proposed development’s consistency with same.

### **Private Open Space**

The Apartment Guidelines set out standards for private open space in Appendix 1 of the Apartment Guidelines. i.e.,

- 4sq.m for studio units;
- 5 sq.m for 1 bed dwellings;
- 6 sq.m for 2 bed / 3 person dwellings,
- 7 sq.m for 2 bed / 4 person dwellings; and
- 9 sq.m for 3 bed dwellings.

### **Proposed Development’s Consistency with Private Open Space**

All of the residential units are provided with a quantum of private amenity space in accordance with the required standards detailed in Appendix 1 of the Apartment Guidelines – for full details of same please refer to the submitted HQA which is enclosed as a separate document.

Private amenity spaces are generally provided in the form of terraces on the ground floor and balconies/terraces on all the upper floors.

### **Communal Open Space**

The Apartment Guidelines also set out standards for communal open space which is required as follows:

- 4sq.m for studio units;
- 5 sq.m for 1 bed dwellings;
- 6 sq.m for 2 bed / 3 person dwellings;
- 7 sq.m for 2 bed / 4 person dwellings;
- 9 sq.m for 3 bed dwellings.



Based upon these standards, the communal open space requirement for the proposed development is:

| Unit Type        | No. of Units | Individual Communal Open Space required m <sup>2</sup> | Total Communal Open Space Required |
|------------------|--------------|--|------------------------------------|
| 1 bed            | 104          | 5  | 520                                |
| 2 bed / 3 person | 6            | 6  | 36                                 |
| 2 bed / 4 person | 192          | 7  | 1,344                              |
| 3 bed            | 19           | 9  | 171                                |
| <b>Total</b>     | <b>321</b>   |  | <b>2,071m<sup>2</sup></b>          |

**Table 4 – Quantum of Communal Open Space Required**

It is proposed that communal open space for the proposed development be provided as follows:

- At ground floor, between Blocks A-B & C-D - c. 1,316sq.m:
- At ground floor, between Blocks E- F, & G - c. 556sq.m:
- In the form of roof gardens located on:
  - Block A (c.154.7 sq.m)
  - Block C (c. 418.6 sq.m)
  - Block F (c. 436.1 sq.m)
  - on the proposed residential amenity use unit (c. 104.6 sq.m).

Therefore, in totality, the proposed communal open space provision for the development equates to c. 2,986.1m<sup>2</sup>.

The proposed development caters for 3,142.2m<sup>2</sup>.of communal open space, which is in excess (by c.44%) of the 2,071m<sup>2</sup> required based on the standards of the Apartment Guidelines and the proposed dwelling mix.

The architectural and landscaping plans/details submitted with the application, including boundary treatments, ensure that public, communal, and private open spaces will clearly be defined and differentiated.

Given all the foregoing, it is considered that the proposed development is compliant with the Apartment Guidelines in this regard.

### **Children's Play**

The Apartment Guidelines states the following in relation to children's play:

*"Children's play needs around the apartment building should be catered for:*

- *Within the private open space associated with individual apartments (see chapter 3);*
- *Within small play spaces (about 85-100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and*
- *Within play areas (200-400 sq, metres) for older children and young teenagers in a scheme that includes 100 or more apartments with two or more bedrooms."*

The proposed development includes a children's play facilities as appropriate. The play strategy of the proposed development is detailed in the Landscape Design Rationale prepared by Dermot Foley Landscape Architects which accompanies the application – please refer to same for further details. A variety of nature play equipment is proposed within public and communal open spaces on ground floor and roof terraces, integrated within the wider landscape and ideally located to allow for passive surveillance. Play equipment is detailed in the submitted Landscape Design Report (section 3.5) prepared by Dermot Foley Landscape Architects and enclosed with in the application. Given all the foregoing, it is considered that the proposed development is compliant with the Apartment Guidelines in this regard.



## Car Parking

Section 4.20 of the Apartment Guidelines note that “*quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria*”.

As previously established in this Statement, the application site is considered to be a ‘Central and/or Accessible Urban Location’ due to its proximity to existing bus stops and services on Swords Road. Section 4.20 of the Apartment Guidelines goes on to identify such locations as “*most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services*”.

Under Section 4.21 of the Apartment Guidelines “Central and/or Accessible Urban Locations”, the following is stated: “*In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, **the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances**. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity*”, (Our Emphasis Added).

In total, the proposed development caters for 194 no. car parking spaces provided for in the form of basement level parking and surface level parking.

Of the total 194 no. on-site dedicated car parking spaces to be provided, 161 no. spaces will be provided within the basement car parking and 33 no. spaces are provided as surface car parking. The surface car parking includes:

- 15 no. Residential Spaces,
- 4 no. Car Share/Car Club spaces,
- 2 no. Set Down spaces,
- 2 no. Retail spaces,
- 6 no Medical GP spaces,
- 3 no. Community spaces and
- 1 no. dedicated 24/7 operational loading bay on-site.

The development proposes a total of 18 no. spaces (equating to 9.3% of all parking spaces) disabled spaces comprising 12 no. spaces at basement level and 6 no. spaces at surface level.

The parking proposals include the following;

- 4 no. Car Share parking spaces,
- 3 no. Set Down/Loading Bays,
- 18 no. dedicated mobility impaired parking spaces (9%),
- 103 no. Electric Vehicle and charging point spaces (53%),
- 180 no resident’s car parking spaces,
- 10 no. motorbike spaces.

In accordance with the CDP, the subject site is located in Zone 2, which requires 1 space per dwelling in accordance with Table 2 in Appendix 5, Volume 2 of the CDP. We note that the CDP states that its car parking standards “*shall be generally regarded as the maximum parking provision*” and 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". The CDP also states that residential spaces are mainly: *"to provide for car storage to support family friendly living policies in the City. It is not intended to promote the use of the car within the City"*.

In addition to the requirements of the CDP, it is noted that the Apartment Guidelines, states (under Section 4.23) that: *"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."*

Taking all of the foregoing into account as well as the contextual location of the application site, the proposed development provides a reduced overall car parking standard when compared to the existing CDP standards (which themselves are a maximum standard). In the context of the Apartment Guidelines the proposed car parking provisions are considered to be wholly justified by the proximity of the proposed development to existing and proposed high quality public transport (bus) routes.

Please also refer to the enclosed Traffic and Transport Assessment prepared by DBFL Consulting Engineers for full details.

Given all the foregoing, it is considered that the proposed development is compliant with the Apartment Guidelines in this regard.

### **Bicycle Parking**

Section 4.17 of the Apartment Guidelines has regard to bicycle parking provisions for new apartment schemes and states that, *"a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units"*.

### **Proposed Development's Consistency with Bicycle Parking**

In total, the proposed development caters for 740 no. bicycle parking spaces, provided in the form of basement level parking, surface level parking, and within the proposed buildings. The 740 no. cycle provision includes:

- 690 no. standard 'long term' spaces (664 no. spaces at basement level, 10 no. spaces within the ground floor level at Block G and 16 no. covered spaces at surface level). These will be allocated to both residents (660) and staff (14).
- 8 no. cargo parking spaces is proposed within the secure basement area.
- 58 no. 'short term' parking located at surface level.

Further details of the proposed bicycle parking and rationale for the proposed quantum are set out in the enclosed TTA prepared by DBFL Consulting Engineers – please refer to section 4.4 of same.

We note that in accordance with the Table 1 in Appendix 5, Volume 2 of the CDP, the proposed development is required to provide for 1 no. cycle space per bedroom for apartments, which would equate to 557 no. spaces. However, it is noted that the Apartment Guidelines, states new apartment schemes should generally cater for 1 no. bicycle parking space per bedroom plus 1 no. visitor parking space for every 2 no. dwellings, which would equate to 718 no. spaces. As stated above, the proposed development caters for a total 740 no. bicycle parking spaces which is in excess of the required standards and ensures that ample bicycle parking will be available within the proposed scheme for the proposed uses.



### 5.2.2 Evaluation of Consistency with the 2023 Apartment Guidelines

Given all the foregoing as set out in Section 4.2 of this Statement, it is respectfully submitted that the development is fully compliant with all the SPPRs and stated criteria of the 2023 Apartment Guidelines. As such, in light of all of the foregoing and having regard to the development's compliance with the SPPRs of the Apartment Guidelines, the development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the national policy.

## 5.3 Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities, 2024

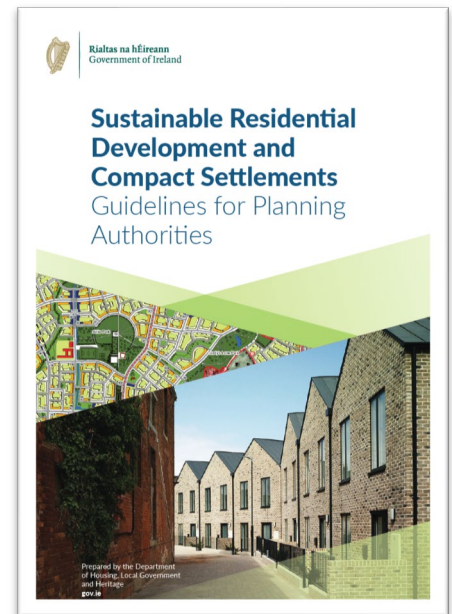
5.3.1 Published in January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (hereafter "SCS Guidelines") constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended), and to which Planning Authorities and An Bord Pleanála shall have regard to and shall apply any specific planning policy requirements (SPPRs) of the SCS Guidelines, in the performance of their functions.

5.3.2 The SCS Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements. It is intended that the SCS Guidelines will be accompanied by a non-statutory Design Manual that will illustrate best practice guidance on how the policies and objectives of the SCS Guidelines can be applied – at the time of submitting this LRD application for permission they were not available and as such regard has been had to the guidance set out in the preceding 2009 Urban Desing Manual as set out under the following section 5.4 of this statement.

5.3.3 The SCS Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations.

5.3.4 The SCS Guidelines are set out in five chapters as follows:

- **Chapter 1 – 'Introduction and Context'** describes the key characteristics of sustainable and compact growth and sets out a summary of Government policy in the areas of spatial planning and housing, climate and sustainable mobility that inform the policy approach.
- **Chapter 2 – 'Implementation'** addresses the interaction of these Guidelines with the plan making and development management processes and with other relevant Section 28 Guidelines.
- **Chapter 3 – 'Settlement, Place and Density'** sets out policy and guidance in relation to the key growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density.
- **Chapter 4 – 'Quality Urban Design and Place Making'** sets out policy and guidance in relation to quality design and placemaking to be applied in the plan making process and in the assessment of individual planning applications.



- **Chapter 5 - 'Development Standards for Housing'** sets out specific planning policy requirements (SPPRs) in relation to housing standards to be applied in support of greater innovation within the housing sector and to facilitate more compact forms of residential development.

**5.3.5** In terms of "Compact Growth", the SCS Guidelines assert that *"priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens"*.

**5.3.6** The SCS Guidelines also state that *"international experience shows that sustainable and compact settlements that comprise an integrated network of well-designed and mixed-use neighbourhoods have many benefits. These neighbourhoods tend to offer improved access to services and amenities, better integration with existing infrastructure and public transport, more efficient use of land and facilitate and support a transition to lower carbon living. The term '15 minute city' has been used in recent years to describe compact neighbourhoods that have a range of local services and amenities and access to public transport all within a short walk or cycle of homes".* The SCS Guidelines also assert that *"In order to achieve compact growth we will need to support more intensive use of existing buildings and properties, previously developed land and infill sites in the built-up areas of existing settlements, in addition to the development of sites in locations served by existing facilities and public transport"* and that *"the NPF target for infill and brownfield development recognises that there is significant capacity within all settlements to accommodate a growing economy and a growing population"*.

**5.3.7** The SCS Guidelines assert that *"To achieve compact growth, it will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges. It will also be necessary to adapt the scale and form of development to the receiving environment and to ensure a proportionate response. Higher densities and taller buildings that exceed the traditional scale will be encouraged in the most central and accessible parts of our cities and large towns, particularly in large-scale regeneration areas, and subject to the protection of historic fabric, character, amenity and natural heritage"*.

**5.3.8** Section 2.12 of the SCS Guidelines state that *"In accordance with the provisions of Section 34 of the Act when making a decision in relation to an application that includes a residential element or other elements covered by these guidelines, the planning authority is required to have regard to the policies and objectives of the Guidelines and to apply the specific planning policy requirements (SPPRs)"*.

**5.3.9** As outlined above, Chapter 3 of the SCS Guidelines sets out policy and guidance in relation to the growth priorities for settlements at each tier in the national settlement hierarchy and in relation residential density. The SCS Guidelines assert that *"when applying the policies and objectives of these Guidelines in relation to density in the preparation of a statutory development plan and in the consideration of a planning application, it will be necessary for the planning authority to identify:*

- (a) the most applicable settlement category based on the categories described in Section 3.3,*
- (b) the most applicable area type based on the area descriptions detailed in Section 3.3 (e.g. central, urban, suburban or edge - refer also Figure 3.1), and*
- (c) the recommended density range for that area.*

*Following this, the decision maker(s) will need to determine the appropriate density range(s) for the area or site. The densities should generally be within the ranges set out in Section 3.3 and can be refined further in accordance with the guidance set out in Section 3.4. It may be necessary and appropriate in some exceptional circumstances to permit densities that are above or below the ranges set out in Section 3.3. In such circumstances, the planning authority (or An Bord Pleanála) should clearly detail the reason(s) for the deviation in the relevant statutory development plan or as part of the decision-making process for a planning application, based on considerations relating to the proper planning and sustainable development of the area”.*

**5.3.10** Section 3.3 “Settlements, Area Types and Density Ranges” states that *“the strategy for all cities is to support consolidation and intensification within and close to the existing built up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport”*. It goes on to state that the key priorities for city growth are *inter alia*:

- *“deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the city and suburbs area or metropolitan towns,*
- *deliver sustainable and compact urban extension at scale at suitable strategic and sustainable development locations that are close to the existing built-up footprint of the city and suburbs area or a metropolitan town and served by existing or proposed high-capacity public transport”.*

**5.3.11** Table 3.1 sets out the density ranges for Dublin and Cork, given their overall size and scale. Table 3.1 defines the “City – Urban Neighbourhoods” as: *“The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations<sup>7</sup>, (iii) town centres designated in a statutory development plan, and (iv) **lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8)** – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork”.* (Our emphasis added).

**5.3.12** Section 3.4 “Refining Density” refers to the application of density in the consideration of individual planning applications, and states that *“the density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport”*. The first step is to consider the proximity and accessibility to services and public transport. The SCS Guidelines state that *“while densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area”*. Table 3.8 “Accessibility” provides definitions for terms used to define accessibility to allow for consistent application, while the SC Guidelines also states that *“The approach to refining density should be informed by the capacity and wider network accessibility of public transport services at a node or interchange (number of options, capacity and peak hour frequency) and the journey time to significant destinations (e.g. city centre or significant employment location)”*.

### High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail<sup>11</sup>, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'<sup>12</sup> stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

### Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

### Intermediate Location

- Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
- Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.

### Peripheral

- Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

**Figure 7 – Copy of Table 3.8 from SCS**

**5.3.13** Step 2 is the "Considerations of Character, Amenity and the Natural Environment" and states that *"While considerations of centrality and accessibility will have a significant bearing on density, it is also necessary to ensure that the quantum and scale of development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity or the natural environment"*.

**5.3.14** Section 3.4.2 of the SCS Guidelines includes the following policy and objective:

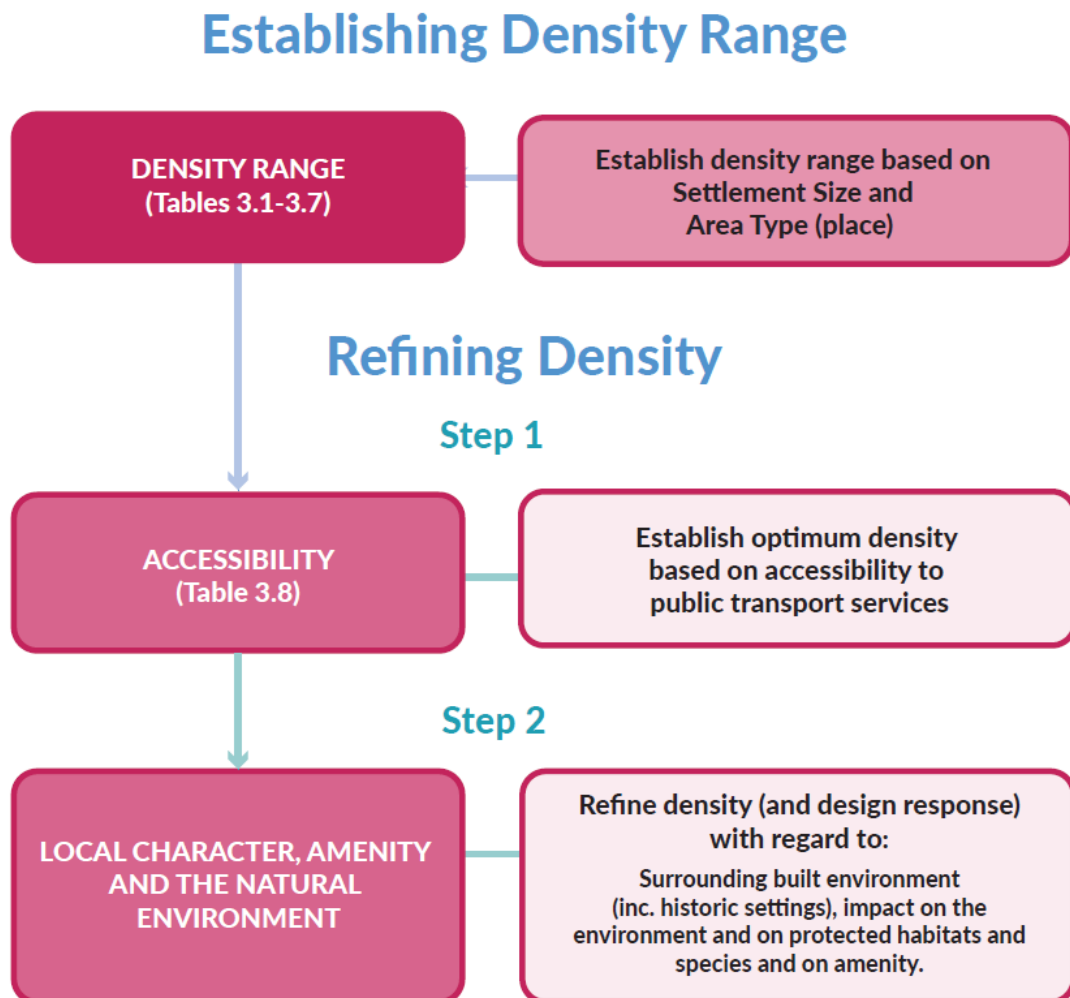
### Policy and Objective 3.1

It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

**Figure 8 - Policy and Objective 3.1 of the SCS Guidelines**



**5.3.15** Chapter 3 of the SCS Guidelines concludes by illustrating the process for establishing, optimising and refining appropriate density for a plan or development, and includes Figure 3.3:



**Figure 97 – Figure 3.3 of the SCS Guidelines**

**5.3.16** Chapter 4 of the SCS Guidelines refers to “Quality Urban Design and Placemaking” and refers to the process of design and placemaking and of key indicators of quality design and placemaking. This chapter contains Policy and Objective 4.1 which provides for:

#### **Policy and Objective 4.1**

It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.

**Figure 10 - Policy and Objective 4.1 of the SCS Guidelines**



### 5.3.17 Section 4.4 sets out a number of key indicators of quality design and placemaking, i.e.:

- Sustainable and Efficient Movement
- Mix and Distribution of Uses
- Green and Blue Infrastructure
- Responsive Built Form

These indicators include *inter alia* the promotion of a move away from segregated land use areas (residential, commercial and employment) that have reinforced unsustainable travel in favour of mixed-use neighbourhoods. The SCS Guidelines state that the following key principles *inter alia* should be applied in the preparation of local plans and in the consideration of individual planning applications:

- *In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8) development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility.*
- *In all urban areas planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access).*
- *It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport.*

This chapter also contains Policy and Objective 4.2 which provides for:

#### **Policy and Objective 4.2**

It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.

Figure 11 – Policy and Objective 4.2 of the SCS Guidelines

### 5.3.18 Statement of Consistency:

The proposed development is located within the Metropolitan Area of Dublin City, at a prominent junction between Santry Avenue and Swords Road, along an acknowledged public transport corridor and within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of the city and caters for high frequency public transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned at this route. The subject site has good, proximate access to a wide range of services, facilities, employment and education opportunities, and amenities, and therefore the scale and quantum of development proposed for the subject site achieves compact growth. The development provides for a density of c. 214 no. dwellings per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including public transport links, that the proposed density on site is appropriate in this instance, and accords with the guidance set out in the SCS Guidelines.

We note from the previous SHD proposal for 350 no. dwellings (Ref. ABP-310910-21), that the Planning Authority was of the opinion that the subject site is suitable for high density development, with the following stated in the Chief Executive's Report on same: *"With regard to the proposed density, the proposed figure of 233 units per hectare (plus commercial development at ground floor) is high. **The planning authority does not have any objection in principle to a high density development on this site, given its close proximity to a high frequency public transport corridor.** The changing character of the area is taken into account and it is noted that permission has been granted by ABP for a Strategic Housing Development at lands to the north-east of the Omni Shopping with a density of 250 residential units per hectare plus an aparthotel and a density of 250 residential units plus ground floor commercial at the former Swiss Cottage site on the opposite side of Swords Road. The density proposed in this proposal is comparable to these recently permitted developments which have proven acceptable to An Bord Pleanála".* Furthermore, the An Bord Pleanála Inspector stated the following regarding density in his assessment of the aforementioned SHD application: ***"Having regard to the central / accessible urban location and brownfield nature of the site, proximity to services and amenities and public transport services, such densities are regarded as acceptable and in accordance with national, regional and local planning policy. I also note the objectives of recent Government Policy set out in Housing for All which identifies the need for construction of an average of 33,000 homes per annum nationally until 2030 to meet the targets outlined in the National Planning. The consolidation of existing built-up areas in the manner proposed will be an important contributor to the achievement of such targets in a more sustainable manner"***. Given the similarity of the design and layout of the current proposal to the previous SHD proposals on the subject site, as well as the current reduction in unit numbers, building height and resultant reduction in density from c.233 units per hectare to a current proposed density of c.214 units per hectare, it is considered that the current proposed density is acceptable and appropriate given the site's locational context and the pattern of permitted development in the environs [Our emphasis added].

The development provides for a density of c. 214 no. dwellings per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including public transport links, that the proposed density for the subject site is appropriate in this instance, and accords with the guidance set out in Tables 3.1 and 3.8 of the SCS Guidelines. The proposed density is also put forward with consideration to the guidance set out in the National Planning Framework (NPF), the Urban Development and Building Heights Guidelines (hereafter 'UD&BHG') and the Apartment Guidelines, all of which promote compact development in existing urban areas by increasing building heights, densities and compact forms for development in order to accelerate housing supply. In particular Objective 35 of the NPF states the need 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."*

We also note that through the assessment of the previous SHD application for the subject site (Ref. ABP-310910-21), the site has been acknowledged as being a "public transport corridor". Therefore, in light of same, it is put forward that there is recognised scope for the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors including *inter alia* Bus connects/Core Bus Corridors (CBC's), and that locations for intensification must have reasonable access to the nearest public transport stop. In line with Table 3.8 of the SCS Guidelines, higher densities will be promoted within 500 metres walking distance of a bus stop, with the subject site being adjacent to an existing public transport corridor (Swords Road QBC), which is also a proposed BusConnects Core Bus Corridor. The existing QBC running Swords Road is utilised by Dublin Bus routes 16, 33, 41, 41b, 41c, and 41d. The aforementioned bus routes travel along the Swords Road corridor which lies to the immediate east of the subject site. The aforementioned bus route numbers are highly accessible with the relevant bus stop being located adjacent to the subject site. All the aforementioned Dublin Bus operated bus services operate on a daily basis and offer relatively frequent schedules.

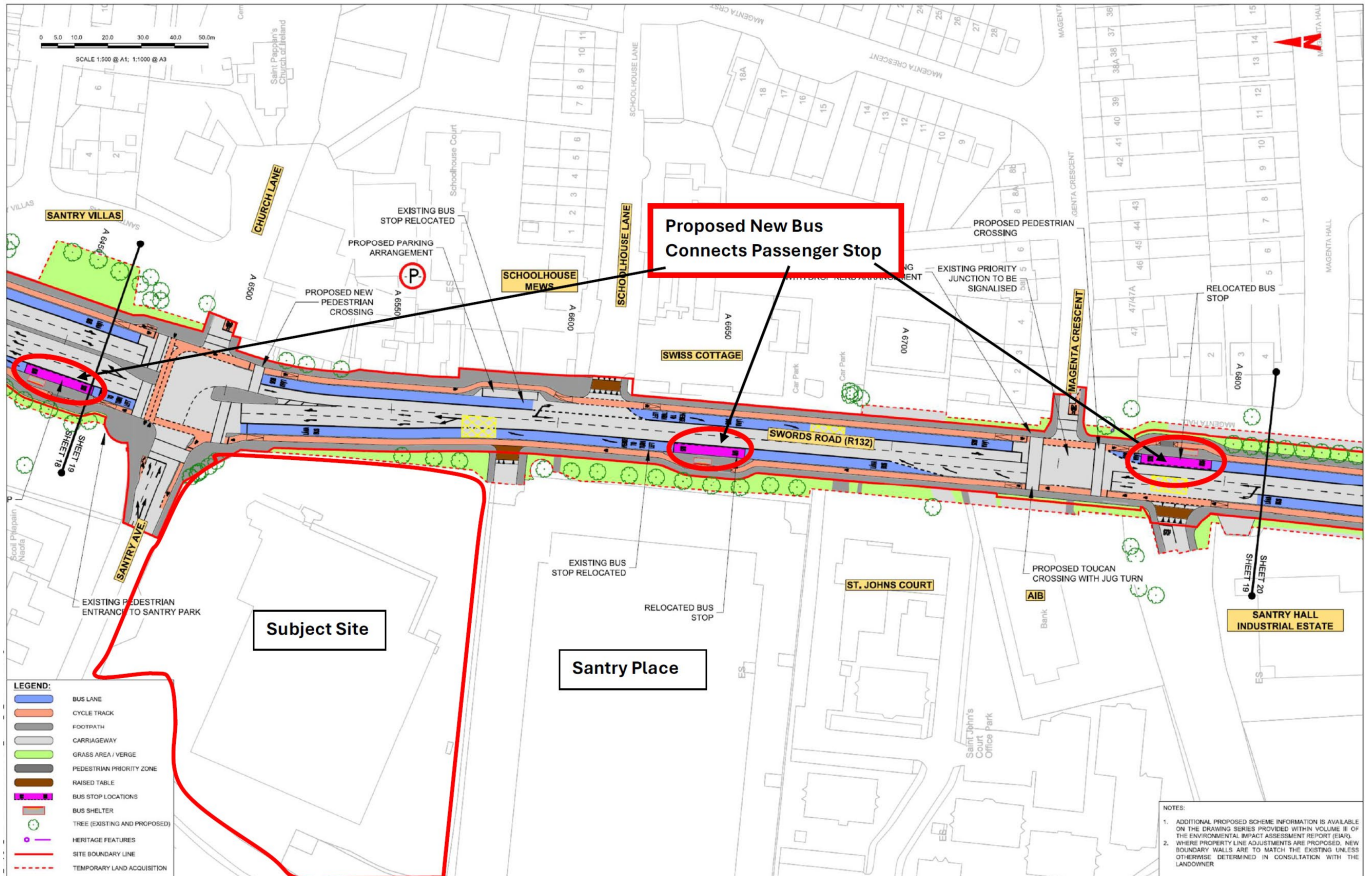


Figure 20 – Extract from Swords to City Centre Core Bus Corridor Scheme General Arrangement Drawings, May 2023 (Drawing no. BCIDB-JAC-GEO\_GA-002\_XX\_00-DR-CR-0019 by Jacobs for NTA).

It can be seen from the drawing above (Figure 20) that the subject site is in close proximity to three no. planned BusConnects passenger stops, with the nearest stops being within c. 70m (to the north) and c.85m (to the south).

As previously discussed, a key element of all these documents is to promote compact development in existing urban areas by increasing building heights and densities in order to accelerate housing supply.

The principles of DMURS are also provided for as part of the current proposal, as we note that DMURS promotes and encourages four Key Design Principles which are:

1. **Connected networks:** To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.
2. **Multi-functions streets:** The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.
3. **Modal Hierarchy with Pedestrian focus:** The quality of the street is measured by the quality of the pedestrian environment.
4. **Multidisciplinary approach:** Greater communication and co-operation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.

The proposed development provides for a mix of uses on a brownfield site that is also adjacent to a high quality public transport corridor. The proposed development meets the Z3 land use zoning objective attached to it and will blend in seamlessly with its environs. Taking all of the foregoing into account, it is considered that the proposed density of 214 no. units per hectare is appropriate and in compliance with the relevant planning policy and guidance for density.

**5.3.19** Chapter 5 of the SCS Guidelines focuses on the design of housing units and the relationship with their immediate surroundings, and sets out four no. SPPRs, which are detailed as follows:

#### **5.3.19.1 Separation Distances:**

Section 5.3.1 of the SCS Guidelines states *“Through the careful massing and positioning of blocks, positioning of windows and the integration of open space at multiple levels it is possible to achieve a high standard of residential amenity and good placemaking with separation distances of less than 22 metres. Separation distances should, therefore, be determined based on considerations of privacy and amenity, informed by the layout, design and site characteristics of the specific proposed development”*.

#### **SPPR 1 - Separation Distances**

It is a specific planning policy requirement of these Guidelines that statutory development plans<sup>15</sup> shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms<sup>16</sup> at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

**Figure 21 - SPPR 1 of the SCS Guidelines**

#### **5.3.19.2 Proposed Development's Consistency with SPPR 1 of the SCS Guidelines:**

The subject site is located on a prominent thoroughfare into the city, i.e. Swords Road, and at a prominent junction of Swords Road and Santry Avenue, within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of city and caters for high frequency public transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned at this route. It is also a brownfield, underutilised site. Given the locational context of the subject site, it is considered that the proposed development, its scale, height and density is appropriate for the subject site. Based upon the foregoing, the submitted site layout plan provides for generous separation distances between the blocks as follows:



- Between Blocks A-B & C-D – 22m
- Between Blocks C-D & E-F – 12.8m extending to 24.2m, extending to 26m
- Between Blocks F & G – 18m.

Each of the blocks are broken up by large areas of communal and public open spaces, while the layout of the blocks and open spaces are aligned with the permitted Santry lace development to the immediate south, with the proposed development proposed to be fully integrated with the adjoining Santry Place such that both developments will be accessible and cohesive, providing for a well planned comprehensive development at this location.

### 5.3.19.3 Private Open Space:

#### **SPPR 2 - Minimum Private Open Space Standards for Houses**

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

|               |         |
|---------------|---------|
| 1 bed house   | 20 sq.m |
| 2 bed house   | 30 sq.m |
| 3 bed house   | 40 sq.m |
| 4 bed + house | 50 sq.m |

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

**Figure 12 – SPPR 2 of the SCS Guidelines**

### 5.3.19.4 Proposed Development's Consistency with SPPR 2 of the SCS Guidelines:

The proposed development does not provide any houses and therefore SPPR2 of the SCS Guidelines is not applicable in this instance. Private open space for the proposed apartments is provided for in accordance with standards for private open space in Appendix 1 of the Apartment Guidelines, and as detailed in the submitted HQA – please refer to same for details.



### 5.3.19.5 Public Open Space:

#### Policy and Objective 5.1 - Public Open Space

It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.

Figure 13 – Policy and Objective 5.1 of the SCS Guidelines

### 5.3.19.6 Proposed Development's Consistency with Policy and Objective 5.1 of the SCS Guidelines:

Public open space for the proposed development is provided for in linear form, centrally located, between Blocks C-D and E-F. The proposed public open space provision equates to c. 1,791m<sup>2</sup> representing c. 12% of the site area, which is within the 10% and 15% recommended ranges for public open space provision.

The submitted Landscape Masterplan and supporting landscaping proposals demonstrate that a high quality of landscaping has been applied to the proposed development which provides for a variety of recreational activities including seating, play areas, outdoor rooms for meeting and socialising etc.

We note that in assessment of a similar site layout plan and open space provision, under the previous SHD application (Ref. ABP-310910-21), that the An Bord Pleanála Inspector stated the following in relation to the then proposed open space: *"Public and communal open space provision within the development is regarded as acceptable. Public open space connects with that of the development to the south to provide an integrated layout and facilitate connectivity in this area"*.

### 5.3.19.7 Car Parking:

Section 5.3.4 of the SCS Guidelines states that in relation to car parking *“With ongoing investment in active travel and public transport across all urban areas and particularly in our cities and larger towns, the number of locations with access to everyday needs and employment within a short walk or cycle or via a regular public transport connection is increasing all the time. In areas where car-parking levels are reduced studies show that people are more likely to walk, cycle, or choose public transport for daily travel. In order to meet the targets set out in the National Sustainable Mobility Policy 2022 and in the Climate Action Plan 2023 for reduced private car travel it will be necessary to apply a graduated approach to the management of car parking within new residential development. The approach should take account of proximity to urban centres and sustainable transport options, in order to promote more sustainable travel choices. Car parking ratios should be reduced at all urban locations, and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport”*. This section of the SCS Guidelines also refers back to Table 3.8 which defines ‘Accessible’, ‘Intermediate’ and ‘Peripheral’ Locations, and states that *“These definitions should form the basis for the approach to car parking”*.

#### **SPPR 3 - Car Parking**

It is a specific planning policy requirement of these Guidelines that:

- (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.
- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

**Figure 144 – SPPR 4 of the Draft SCS Guidelines**

### 5.3.19.8 Proposed Development’s Consistency with SPPR 3 of the SCS Guidelines:

Car parking for the proposed development will be provided in the form of surface and basement level car parking. In total, the proposed development caters for 194 no. car parking spaces provided for in the form of basement level parking and surface level parking. Of the total 194 no. on-site dedicated car parking spaces to be provided, 161 no. spaces will be provided within the basement car parking and 33 no. spaces are provided as surface car parking. The surface car parking includes:



- 15 no. Residential Spaces,
- 4 no. Car Share/Car Club spaces,
- 2 no. Set Down spaces,
- 2 no. Retail spaces,
- 6 no Medical GP spaces,
- 3 no. Community spaces and
- 1 no. dedicated 24/7 operational loading bay on-site.

The development proposes a total of 18 no. spaces (equating to 9.3% of all parking spaces) disabled spaces comprising 12 no. spaces at basement level and 6 no. spaces at surface level.

The parking proposals include the following;

- 4 no. Car Share parking spaces,
- 3 no. Set Down/Loading Bays,
- 18 no. dedicated mobility impaired parking spaces (9%),
- 103 no. Electric Vehicle and charging point spaces (53%),
- 180 no resident's car parking spaces,
- 10 no. motorbike spaces.

In accordance with Map J “*Existing and Future Strategic Transport & Parking Areas*” of the existing CDP, the subject site is located in Zone 2, which requires 1 space per dwelling in accordance with Table 2 of Appendix 5 of the CDP. We note that the CDP states that these “*car parking standards shall be generally regarded as the maximum parking provision and parking provision in excess of these maximum standards shall only be permitted in exceptional circumstances e.g. boundary areas, or where necessary for the sustainable development of a regeneration area*”.

The Apartment Guidelines also have regard to car parking for new apartment schemes and, as Section 28 Guidelines, take precedence over the CDP standards, the proposed car parking is based upon the standards set out in the Guidelines. The Apartment Guidelines seek to reduce car parking, where possible, in favour of more sustainable modes of transportation, and state the following with regard to ‘Central and/or Accessible Urban Locations’: “*In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking **provision to be minimised, substantially reduced or wholly eliminated in certain circumstances***”, [Our emphasis added].

The Apartment Guidelines define ‘Central and/or Accessible Urban Locations’ as: “*locations are most likely to be in cities, especially in or adjacent to (i.e., within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or **within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services***”, [Our emphasis added].

The subject site clearly defined as a ‘Central and/or Accessible Urban Location’ within the context of the Apartment Guidelines, based upon the site’s proximity to an existing high quality public transport (Swords Road QBC) and proposed public transport routes (BusConnects Corridor on Swords Road). Therefore, the car parking provision for the development can be appropriately: “*minimised, substantially reduced or wholly eliminated in certain circumstances*” as recommended by the Apartment Guidelines.

The proposed car parking provision of 194 no. spaces equates to a ratio of c.0.6 spaces per dwelling which represents a reduced car parking standard when compared to CDP standards (which are a maximum); however, in the context of the Apartment Guidelines the proposed car parking provision is considered to be wholly justified

by virtue of the site's proximity to existing public transport options (existing and proposed urban bus services within 1km (i.e. directly adjacent to) of the application site).

Further details of the proposed car parking and rationale for the proposed quantum are set out in the enclosed Traffic & Transport Assessment (TTA) prepared by DBFL Consulting Engineers – please refer to same.

### 5.3.19.9 Bicycle Parking and Storage

#### SPPR 4 - Cycle Parking and Storage

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.
- (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.

Figure 155 - SPPR 4 of the SCS Guidelines

### 5.3.19.10 Proposed Development's Consistency with SPPR 4 of the SCS Guidelines:

In total, the proposed development caters for 740 no. bicycle parking spaces, provided in the form of basement level parking, surface level parking, and within the proposed buildings. The 740 no. cycle provision includes:

- 690 no. standard 'long term' spaces (664 no. spaces at basement level, 10 no. spaces within the ground floor level at Block G and 16 no. covered spaces at surface level). These will be allocated to both residents (660) and staff (14).
- 8 no. cargo parking spaces is proposed within the secure basement area.
- 58 no. 'short term' parking located at surface level.

Further details of the proposed bicycle parking and rationale for the proposed quantum are set out in the enclosed TTA prepared by DBFL Consulting Engineers – please refer to section 4.4 of same.

We note that in accordance with the Table 1 in Appendix 5, Volume 2 of the CDP, the proposed development is required to provide for 1 no. cycle space per bedroom for apartments, which would equate to 557 no. spaces. However, it is noted that the Apartment Guidelines, states new apartment schemes should generally cater for 1 no. bicycle parking space per bedroom plus 1 no. visitor parking space for every 2 no. dwellings, which would equate to 718 no. spaces. As stated above, the proposed development caters for a total 740 no. bicycle parking spaces which is in excess of the required standards and ensures that ample bicycle parking will be available within the proposed scheme for the proposed uses.





Further details of the proposed bicycle parking and rationale for the proposed quantum are set out in the enclosed TTA prepared by DBFL Consulting Engineers – please refer to same.

#### **5.3.19.11 Operation and Management of the Development**

Section 5.3.6 of the SCS Guidelines state that for developments that “include multi-unit and compact housing blocks, communal facilities such as refuse storage areas should be provided in open spaces that will not be taken in charge. Planning applications should include an operational management plan that sets out details of the long-term management and maintenance of the scheme. The plan should address provisions made for the storage and collection of waste materials in residential schemes, particularly where there are reduced areas of private outdoor space. Communal refuse facilities shall be accessible to each housing unit and designed with regard to the projected level of waste generation and types and quantities of receptacles required”.

#### **5.3.19.12 Statement of Compliance:**

This LRD application is accompanied by an Operational Waste Management Plan and a Property Management Strategy Report – please refer to both. Note the Operational Waste Management Plan is enclosed as an Appendix to Chapter 12 of the submitted Environmental Impact Assessment Report, while the Property Management Strategy Report is enclosed as a standalone document.

#### **5.3.20 Appendix D - Design Checklist - Key Indicators of Quality Urban Design and Placemaking**

In accordance with Appendix D of the SCS Guidelines, the following sets out the proposed development's compliance with the design checklist and its key indicators for quality urban design that have been applied to the proposed development. We note that the SCS Guidelines state that some development proposals may perform better against some indicators than others, and “it will be a matter for the planning authority (or An Bord Pleanála in the case of an appeal or direct application) to determine whether the proposal overall is acceptable from a design perspective”.

##### **1. Sustainable and Efficient Movement**

*(i) Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)?*

##### **Response:**

Yes, the proposed development opens up the subject site to permeability, directly connecting Santry Avenue with Sword Roads via the development and also creating permeable links to the adjoining Santry Place development to the south. Priority pedestrian and cyclist access is provided for throughout the development, also affording links to Santry Park / Demesne to the north.

*(ii) Have opportunities to improve connections with and between established communities been identified and responded to with particular regard to strategic connections between homes, shops, employment opportunities, public transport, local services and amenities?*

##### **Response:**

Yes, the site is ideally located within the built up Santry area, at an important junction node on the northern edge of the city. There is a long-established residential community in Santry with a variety in local services, facilities, retail, recreation etc. in walking distance of the subject site. The proposed development provides for ground



floor mixed uses that will enjoy good footfall along Swords Road / Santry Avenue and through the scheme, with ground floor animation provided fronting onto the streets and public open space, again linking the subject development with Santry Place to the immediate south.

*(iii) Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users?*

**Response:**

Yes, the site layout plan is not roads dominated, with vehicular activity limited to the perimeter of the site to create car-free, high quality amenity spaces at the centre. The alignment of open spaces and creation of pedestrian linkages from the existing pocket park in the neighbouring Santry Place through the proposed development onwards to Santry Park/Demesne to the north allows safe and comfortable pedestrian / cyclist movement through the development.

*(iv) Has the quantum of parking been minimised (in accordance with SPPR4 where relevant) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles?*

**Response:**

Yes, the proposed car parking ratio equal to 0.6 spaces per unit with the majority of car parking accommodated in the basement car park. There are proposed car club/share spaces allocated at surface level to encourage more sustainable forms of transport being used. In addition, there is ample bicycle parking accommodated, which again promotes sustainable travel.

## **2. Mix of Land Uses (Vibrant Centres and Communities)**

*(i) Is the mix and intensity of land uses appropriate to the site and its location and have land uses been distributed in a complementary manner that optimises access to public transport, amenities and local services via walking or cycling?*

**Response:**

Yes, the land use zoning objective "Z3" attached to the site provides for Neighbourhood Centre Uses. The proposed development provides for the following mix of uses: retail, GP practice, community/arts/cultural uses, all of which accord with the Z3 land use zoning attached to the site. In addition, the scale of proposed non-residential uses will not detract from existing services/facilities in the area but will support the creation of a long term sustainable community on the site. The site enjoys the benefit of good public transport services as it is located adjacent to the Swords Road QBC and planned BusConnects corridor which will cater for public transport services.

*(ii) Have a diverse and varied range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by an innovative range of housing typologies that support greater housing affordability and choice?*

### Response:

Yes, there is a mix of 1, 2 and 3 bedroom apartments within the proposed development, comprised of:

- 104 no. 1 bedroom apartments (32%)
- 198 no. 2 bedroom apartments (62%)
- 19 no. 3 bedroom apartments (6%)

The proposed dwelling mix is put forward in consideration of projected trends for declining household sizes in the State, and the required housing needs for Dublin. The NPF notes that roughly 70% of Irish households consist of three persons or less, with the average household size in the State projected to decline to c. 2.5 persons by 2040. The NPF also details that household sizes tend to be smaller in urban areas such as Dublin, in comparison to suburban or rural areas, and notes that in Dublin City, c. 80% of all households are made up of 3 people or less. The proposed dwelling mix is also put forward in compliance with the Specific Planning Policy Requirements (SPPRs) i.e. SPPR 1 and SPPR 2 of the Apartment Guidelines, which is also referenced in section 15.9.1 “Unit Mix” of the Dublin City Development Plan, 2022-2028 (hereafter “CDP”). SPPR 1 of the Apartment Guidelines (2022), states: *‘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)’.*

We note that the CDP includes a *Housing Need Demand Assessment (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.”*

In accordance with the NPF, which recognises the increasing demand to cater for one and two person households, a mix of 1 and 2 bed apartments units are catered for, equating to c.94% of the overall proposed unit types.

*(iii) Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable) and promote town centre living (where applicable)?*

### Response:

Yes, the proposed development seeks to redevelop an underutilised, zoned, urban, brownfield site, located adjacent to public transport services and open it up to more efficient land uses, that complies with national and local planning policy.

*(iv) Is the regeneration and revitalisation of an existing centre or neighbourhood supported by the enhancement of the public realm so as to create a more liveable environment, attract investment and encourage a greater number of visitors (where applicable)?*

**Response:**

Yes, the subject site is currently a builders providers with associated yard, closed/fenced off to the public. The proposed development seeks to create an animated street frontage along Swords Road and Santry Avenue and create new open spaces that will invite people into and through the scheme, accessing Santry Place to the south and Santry Park/Demesne to the north. The proposed community/arts/cultural uses are strategically located within the scheme to afford maximum visibility and invite people in to participate in such uses, thus fostering community growth.

**3. Green and Blue Infrastructure (Open Space, Landscape and Heritage)**

*(i) Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the setting of protected structures, conservation areas and historic landscapes?*

**Response:**

Yes. The existing condition of the site is predominantly hard standing but the proposed development includes the creation of new open spaces and planting. The enclosed landscape visual impact assessment has considered the impact of the proposed development on the receiving environs including on protected views, prospects and structures.

*(ii) Have a complementary and interconnected range of open spaces, corridors and planted/ landscaped areas been provided, that create and conserve ecological links and promotes active travel and healthier lifestyles?*

**Response:**

Yes, the site layout plan has been purposefully designed to create a green corridor from Santry Place to the south, via the proposed development and onwards to connect to Santry Park/Demesne to the north, inviting the rich variety of greenery from the Park into the development creating a high quality development within an urban arboretum.

*(iii) Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)?*

**Response:**

Yes, all open spaces will be universally accessible with the landscape design catering for a range of recreational activities, as well as play for various age groups.

*(iv) Does the plan or development proposal include integrated nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation?*

**Response:**

Yes, a variety of SuDS proposals, including green roofs and blue roofs are provided for as part of the proposed development.

**4. Responsive Built Form**

*(i) Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure in terms of block layouts and building heights with particular regard to the location of gateways and*

*landmarks, the hierarchy of streets and spaces and access to daylight and sunlight?*

**Response:**

Yes, Block A at the north-east corner of the site, strategically placed at the junction of Swords Road and Santry Avenue has been designed as a landmark building and also the tallest building. Details of the proposed design of Block A are set out in the submitted Architectural Design Statement – please refer to same.

The key design principles of the proposed development include:

- Creating a pedestrian / cyclist friendly environment, ensuring limited vehicular activity on site by keeping it to the perimeter of the site,
- Alignment of permeable, connected open spaces with Santry Place to the south,
- Creation of green links to the north and south,
- Provision of non-residential ground floor uses that front directly onto open spaces, Santry Avenue and Swords Road,
- All outdoor spaces have been assessed for daylight/sunlight accessibility and been found to be acceptable.

*(ii) Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface?*

**Response:**

Yes, the site layout plan and landscape design (both hard and soft landscaping) ensures there is a clear delineation of public, communal and private spaces. All public / communal spaces are overlooked thus ensuring passive supervision.

*(iii) Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant), integrate well within its context and provide appropriate transitions with adjacent buildings and established communities so as to safeguard their amenities to a reasonable extent?*

**Response:**

Yes. The local area is undergoing transformation with taller, higher density development taking place in recent years, that the traditional urban form of Santry. The proposed development is considered to be on par with same, thus ensuring it will successfully assimilate into the receiving environs.

*(iv) Has a coherent architectural and urban design strategy been presented that will ensure the development is sustainable, distinctive, complements the urban structure and promotes a strong sense of identity?*

**Response:**

Yes. The three linear blocks A/B, C/D & E/F are extruded vertically at the north of the site as they address Santry Demesne, creating a dynamic gateway gesture with all three elements acting in unison. The tall elements have been faceted to the north to improve their slenderness ratio and elegance. Viewed from Santry Demesne, these tall elements protrude over the mature trees presenting a Central Park-like quality and positive contribution to the skyline. The high point within the development (Block A) forms a strong urban anchor and landmark at the corner where it bookends both Santry Avenue and Swords Road and announces the entrance to the city. The introduction of the roof terrace allows the roof profile to become more dynamic at the corner, creating a stronger architectural impact at this important junction that will contribute to the placemaking of the area.

The proposed design seeks to prioritise walking and cycling and minimise the use and visual impact of cars. To this extent, we have kept vehicular activity to the perimeter of the site to create car-free, high quality amenity spaces at the centre. The establishment of an 'urban arboretum' with the green connection to Santry Demesne will provide a sense of place and identity and define the development as a park-side development.

The high-quality nature of the development is evidenced by the rich variety of ground floor uses, both communal and public. The development includes retail units, a cafe, indoor residential amenity space and a community/arts/cultural use space as well as landscaped gardens and children's play areas. These amenities fit into a broader network of existing communal and public amenities including playgrounds, community/arts/cultural floorspace which are interconnected along the proposed new green corridor.

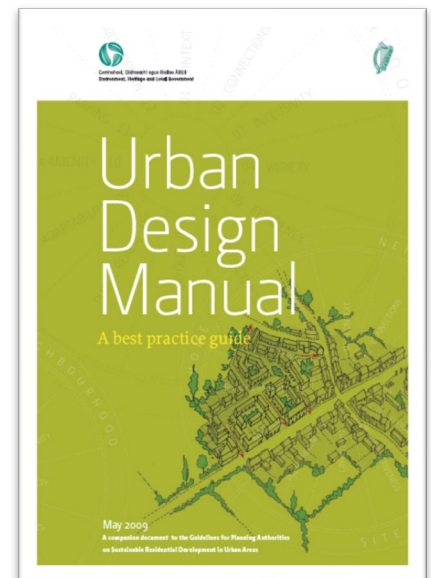
#### **5.2.21 Evaluation of Consistency with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024**

Given all the foregoing as set out in Section 5.4 of this Statement, it is respectfully submitted that the development is fully compliant with the stated criteria of the 2024 SCS Guidelines. As such, in light of all of the foregoing, and having regard to the development's compliance with the SPPRs and standards of the SCS Guidelines, the development ought to be granted permission so that the application site can be appropriately and efficiently developed in compliance with the intended national policy.

### **5.4 Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities and the accompanying Urban Design Manual (2009)**

**5.4.1** The Guidelines on Sustainable Residential Development in Urban Areas (hereafter "Guidelines") have been replaced by the above referenced Sustainable Residential Development and Compact Settlements Guidelines, 2024. However, the 2009 Guidelines were accompanied by the Urban Design Manual which illustrates how the policy principles of the 2009 Guidelines can be translated into practice by developers and planning authorities when designing new residential schemes. The Urban Design Manual provides a series of criteria (12 no.) against which residential proposals can be assessed at the 3 no. levels, being: the neighbourhood, the site, and the home.

**5.4.2** The Design Manual of the new SCS Guidelines has not been published yet and to that end this statement refers to 2009 Urban Design Manual only.



#### **5.4.3 Statement of Consistency with the Urban Design Manual**

The proposed development has regard to the advice set down in the 'In Practice' section of the Urban Design Manual, which recommends the following approach:

- **Development Brief:** An analysis of the site has been carried out included a review of the existing surrounding environs. The development has been designed as to ensure that the proposed scheme is in keeping with / responds to the design of the surrounding development, particularly the permitted Santry Place development to the south which is currently under construction by the applicant. The development has also had regard to the existing site conditions such as access and egress, with proposed accesses in keeping with those permitted for the Santry Place development.





- **Site Analysis:** The characteristics of the subject site and surrounding context has been established and potential linkages and vistas to adjoining lands analysed.
- **Concept Proposals:** This application is accompanied by an Architectural Design Statement which outlines the concept design proposal.
- **Pre-planning:** Pre-Planning discussions have been held in the past via the SHD planning process with both Dublin City Council and An Bord Pleanála. The current proposal has also undergone the two stage of the LRD pre-planning process and the applicant is in receipt of the LRD Opinion from the Planning Authority (Ref. LRD6044/23-S2) prior to the submission of this LRD planning application. The feedback garnered from all of these meetings is now incorporated into the current design proposal.

As previously stated, this submission is accompanied by an Architectural Design Statement which fully details proposed development's compliance with the 12 Design Criteria and Indicators contained in the Urban Design Manual, which is also in accordance with the requirements of the current Dublin City Development Plan (Chapter 5 – Quality Housing and Sustainable Neighbourhoods). The Architectural Design Statement should be read in conjunction with this statement, and the plans / particulars lodged with the application. For convenience, the 12 Design Criteria of the Urban Design Manual are also discussed below.

#### 1. ***“Context: How does the development respond to its surroundings?”***

The application site is situated at a prominent corner location at the junction of Santry Avenue and Swords Road, the latter of which is a well-established entrance route into Dublin from the north of the city. The site is located in a built-up, urban area and within walking distance of a range of local services and amenity space; however, it is currently a brownfield site in private use and contributes little in terms of aesthetics to the existing environs. Given its location, it is considered that the site is very much underutilised and represents inefficient planning in its current state.

The proposed development seeks to remedy this situation by regenerating the site as a new, residentially led, urban area. The height, scale, and massing, of the development has been informed by the strategic location of the site, adjacent to a public transport corridor, while taking cognisance of the surrounding developments.

The tallest element of the scheme (13 storeys - Block A) is located at the corner of Santry Avenue and Swords Road, giving a landmark element at a prominent location on one of the main routes from the north into Dublin city. In the context of the size of the existing junction, the presence of open space to the immediate north and north/west, and the lack of residential dwellings to the west, it is considered that the height of Block A is easily accommodated without any detriment to existing amenity.

To the west of Block A, Blocks D & E, as they front onto Santry Avenue, provide for 8 storeys, giving strong frontage and definition to the Santry Avenue streetscape, both complimenting and contrasting with the opposite a large regional park (Santry Demesne). The locational context of Blocks A, D & E, adjacent to existing roads and open space, create an ideal opportunity for increased heights which, again, is not to the detriment of existing amenity in the vicinity, and in keeping with the permitted heights of the adjoining Santry Place.

To the rear of the site, Blocks B, C & F cater for 7 storey buildings, and are aligned with the permitted 7 storey blocks to the south which are currently under construction i.e. the Santry Place development. The setting and heights of Blocks B, C & F, together with the location of the proposed public and communal space provisions, provide for full integration between permitted and proposed developments, allowing for a new urban, residentially led, quarter to be developed at this important corner location.



The proposed 7 storey height of Block G appropriately addresses the south-west corner of the site and caters for efficient use given that the surrounding development to the west / south-west is made up of commercial/retail uses, therefore the development has limited potential to impact these uses.

Furthermore, the proposed non-residential elements of the development, including for 3 no. retail units, a medical suite / GP Practice unit and community/arts & culture space, all located at ground floor level, and a one storey residential amenity use unit, are located at ground floor level and front onto Swords Road and Santry Avenue, creating activity and a sense of vibrancy.

It is considered that the development responds to its context by creating a strong street edge with the layout of the buildings, in a north-south orientation, paying cognisance to the permitted development to the south at Santry Place. Punctuation into the site, through the positioning of the buildings, allows for light penetration and a visual connection to Santry Park, and inviting people into the scheme with direct permeability catered for between the development and Santry Place to the south.

## **2. *“Connections: How well is the new neighbourhood / site connected?”***

In its existing state, the site is currently in private use and generally inaccessible to the wider community. The development will open the site to pedestrians and cyclists with permeability / accessibility provided from both Santry Avenue and Swords Road. Vehicular access to the development will be from both Santry Avenue and Swords Road, with permitted entrances for the Santry Place development incorporated into the proposed layout. There will be direct connectivity between the development and Santry Place to the south, with the layout of the blocks ensuring that proposed public and communal open spaces are integrated with the permitted public and communal open spaces at Santry Place. Along the northern and eastern boundaries of the site, the setback of the buildings provides for paths thus connecting the development to the wider environs, which is a significant improvement from the site's current condition.

## **3. *“Inclusivity: How easily can people use and access the development?”***

The development includes a wide mix of unit types / sizes including 1, 2, and 3 bed apartments, which caters for a variety of household formations, living arrangements and demographics, in a long-established urban neighbourhood. Falls and gradients are minimised wherever possible and level access is catered for at all parking locations. All of the residential units will meet the requirements of Part M of the Building Regulations Technical Guidance Documents where accessibility is concerned. The ground level public and communal open space, located between the blocks, are overlooked to ensure active surveillance and enhanced security.

The proposed non-residential elements of the development are located at ground floor level and front onto both Swords Road and Santry Avenue, creating activity and ease of access / use. In particular, the residential amenity use unit provides for a welcoming entrance point to the development for future residents and will create a common area for the future residents.

The proposed internal road network wraps around the blocks, providing for a legible layout. The development provides for disabled car parking spaces and secure bicycle parking areas.

## **4. *“Variety: How does the development promote a good mix of activities?”***

The development includes a wide mix of unit types / sizes including 1, 2 and 3 bed dwellings. A wide variety of tenures and housing formats are provided to suit a range of lifestyles and demographics. The proposed non-residential elements of the development are located at ground floor level and front onto Swords Road and Santry Avenue, creating an animated street frontage. These non-residential uses provide for 3 no. retail units, a medical suite / GP Practice unit and community/arts & culture space, and a one storey residential amenity use unit all



are located at ground floor level, which creates a variety of appropriate uses to serve both future residents and the wider community as applicable.

At the heart of the scheme is a large area of public open space which is laid out in a manner that provides direct visual connection to the north to Santry Park. Together with this public open space, the proposed surface level communal open spaces located between the blocks provide visual and physical connection to the public and communal open spaces at Santry Place to the south. The proposed open spaces facilitate seating and children's play providing visual amenity.

**5. *"Efficiency: How does the development make appropriate use of resources, including land?"***

The development provides a gross and net density of c. 214 dwellings per hectare. The proposed density is therefore considered to be making full, efficient, use of the available lands. The proposed density and building heights capture the opportunity to develop the site appropriately, with the site's location adjacent to public transport options and existing surrounding environs ensuring that the site is capable of supporting such height and density without any detriment to existing residential amenity.

At ground floor, the proposed non-residential elements of the development cater for a variety of services to support local needs, in compliance with the Z3 zoning attached to the site and create a vibrant street frontage that will ameliorate the current brownfield condition of the site.

Pedestrian links are maximised within the development, including permeability into adjoining lands. SUDS areas are proposed within the site which will create attractive area for biodiversity. The provision of roof terraces ensures that an ample supply of communal open space is provided for future residents. The layout and orientation of the development has been designed to have regard to aspect and views and ensure dwellings and areas of public, private and communal open space achieve light throughout the day.

**6. *"Distinctiveness: How do the proposals create a sense of place?"***

The subject site occupies a prominent corner location which is currently underutilised. Given the scale of surrounding development, the existing use of the site is lost and provides for little definition or sense of place. The current industrial, low level, and enclosed, nature of the site will be significantly improved by the proposed development.

The sense of place to be achieved will be through the positioning of the varied building heights and by the design of the hard and soft landscape. The combination of these factors will give the development definition and legibility within the wider environs. Block A will provide for a landmark building announcing both the development and the urban environs of Dublin city as commuters enter from the north of the city. Blocks A, D & E, as they front onto Santry Avenue, give a strong urban frontage to the streetscape which both compliments and contrasts with the large regional park to the north (Santry Demesne). The proposed residential amenity unit, located between Blocks A & D, provides for a welcoming and defined entrance to the development, while also providing an appropriate boundary for the communal open space location to its rear.

The centrally located public open space provides for visual and tangible connection for the wider public between Santry Park / Demesne (to the north) and Santry Place (to the south). The central open space includes play facilities and hard and soft landscaping, while proposed boundary treatments will define public, private and communal open area. The proposed roof terraces also aid the creation of a sense of place and community within the development.

With regard to the wider community, the proposed non-residential uses, i.e. 3 no. retail units, a medical suite /



GP Practice unit and community/arts & culture space, will create an defined new urban area in Santry which caters for activity and a variety of uses.

**7. “Layout: How does the proposal create people-friendly streets and spaces?”**

The development provides for significant improvements to the public realm and pedestrian accessibility to the site, therefore creating a people friendly environment of streets and spaces. Proposed routes through the site follow the principles of DMURS, ensuring that traffic speeds are minimised and that the pedestrian is favoured. The priority for access into and through the site and onwards to adjoining lands to the south is afforded to pedestrians and cyclists. A mixture of shared surfaces and limited surface parking will also aid the creation of a pedestrian friendly environment.

The areas of public and communal open space are centrally located in easy walking distance of all dwellings. This open space incorporates a playground and is overlooked by dwellings on all sides for active supervision. The development also provides for high quality ground floor active uses which will invite and attract people to the development thereby creating attractive and friendly spaces and provide activity throughout the day.

**8. “Public Realm: How safe, secure and enjoyable are the public areas?”**

The non-residential ground floor uses fronting onto Swords Road and Santry Avenue ensure an appropriate level of activity is provided at street level as to create safe, secure and enjoyable public areas. The public open space provision for the development is centrally located so as to be in easy walking distance of all dwellings and passively supervised. The open space incorporates children’s play, with direct connections to adjoining open space to the south, and visual connectivity to Santry Park to the north. Communal open spaces for the development are also centrally located to be in easy walking distance of all dwellings and passively supervised. The layout of the blocks allows for light penetration into these areas of open space for maximum amenity. Landscaping and boundary treatments will ensure that communal and public open spaces are clearly defined from each other, ensuring a safe and enjoyable environment for the future residents.

**9. “Adaptability: How will the buildings cope with change?”**

All the proposed residential units meet and / or exceed the minimum standards for residential dwellings detailed in the Apartment Guidelines. The development provides a mix of 1, 2 & 3 bed dwellings that can be easily reconfigured to adapt to the changing life cycles and personal needs of each resident.

The proposed buildings are to be finished in high quality metal cladding, brick, louvered screens and glazing are the primary materials proposed, giving a character of strength and robustness befitting the industrial context. The choice of materials also has a strong durability with minimal maintenance and upkeep requirements. The units are designed to be compliant with Building Regulations and will incorporate sustainable heating and energy efficiency requirements. A Building Life Cycle Report is enclosed as a separate document and demonstrates how the development will adapt to changes life cycles and tenures.

**10. “Privacy / Amenity: How do the buildings provide a high quality amenity?”**

Each dwelling has access to usable private outdoor space, in the form of terraces at ground floor level and balconies on all upper floors, which meets and/or exceeds the minimum standards for residential dwellings detailed in the Apartment Guidelines. The development caters for a ratio of dual aspect dwellings in compliance with the Apartment Guidelines. All of the dwellings meet and / or exceed the minimum standards for storage



and internal living space detailed in the Apartment Guidelines, with all such details set out in the enclosed HQA. Adequate and accessible bin storage is also provided for within the scheme.

The proposed layout also has due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling and provides for adequate separation distances between dwellings / blocks. This ensures a high level of privacy and amenity areas and reduces the level of overlooking and overshadowing. In addition, the development provides for high quality amenity space in the form of landscaped open space and roof terraces. The provision of the high-quality public and communal open space, in compliance with the standards stated in the existing CDP and the Apartment Guidelines, ensures high quality areas residential amenity for future residents.

**11. *“Parking: How will the parking be secure and attractive?”***

In total, the development caters for 194 no. car parking spaces provided for in the form of basement level parking and surface level parking. The basement level includes for 161 no. car parking spaces. The basement level is internally accessible from cores of Blocks A, B, C, D, E, & F, while external vehicular access is from the south between Blocks B & C. An additional 33 no. car parking spaces are also provided for within the site at surface level. The basement car park also accommodates 10 no. motorbike parking spaces.

Parking at both basement and surface level will be well lit, while surface level parking is laid out so as to be overlooked by the dwellings for further security. Contrasting hard landscaping and occasional planting will define the parking zones.

The development also caters for 740 no. bicycle parking spaces, provided in the form of basement level parking, surface level parking, and within proposed blocks. Of the proposed bicycle parking provision, 690 no. long-term / resident bicycle parking spaces are catered for and a further 58 no. proposed as short-term / visitor parking on surface level.

**12. *“Detailed Design: How well thought through is the building and landscape design?”***

An approach has been outlined to the development of the street elevations in terms of place making and the creation of a recognisable neighbourhood through a combination building form, elevation materials and hard and soft landscape.

The development has been subject to pre-application consultations between the design team and Dublin City Council, as well as having regard to the planning history attached to site, which have fully informed the proposed design, ensuring a plan led development that appropriately addresses the contextual location of the site, the protection of existing amenity, and need to efficiently develop the site in light of national planning policy.

The design of the buildings seeks to create a new landmark at this important node, providing a robust range of unit types and sizes to reflect the needs of a range of households, living arrangements and economic situations. Passive surveillance of adjoining public and private space has been a key driver in design development through the maximisation of active frontages and the siting of entrances and windows.

An Architectural Design Statement, prepared by Davey & Smith Architects, which sets out a comprehensive design rationale for the development, is enclosed with the application – please refer to same for further details. A Landscape Design Rationale has also been prepared by Dermot Foley Landscape Architects is also enclosed with the application. The landscape strategy ensures appropriate boundary treatments are provided in addition to a well-designed landscape strategy for the roof terraces, public, and communal open spaces, to ensure the use of these spaces is maintained throughout the year.



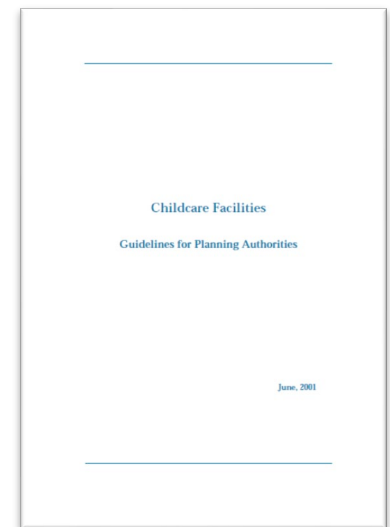


Given all the foregoing it is considered that the development is fully compliant with the guidance for new developments and urban design principles as set out in the Urban Design Manual (2009).

## 5.5 Childcare Facilities Guidelines for Planning Authorities (2001)

The Childcare Facilities Guidelines for Planning Authorities direct Planning Authorities to facilitate the provision of childcare facilities in appropriate locations. The guidelines state that, in general, one new facility catering for 20 no. childcare places should be developed for every 75 new residential dwellings. The guidelines also provide broader guidance on internal room sizes for childcare facilities.

The guidelines state that the provision of new childcare facilities should have regard to the location of existing facilities, emerging demographics in the area, and advise that the provision of childcare facilities should form an integral part of pre-planning consultations between applicants and Planning Authorities.



### 5.5.1 Statement of Consistency with the Childcare Facilities Guidelines

The guidelines state that, in general, one new facility catering for 20 childcare places should be developed for every 75 new residential dwellings. Based upon the proposed development of 321 no. dwellings this would equate to a provision of c. 86 no. childcare places; however, the more recent Apartment Guidelines state with regard to childcare provision that: *“One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision”*. The development caters for 104 no. 1 bedroom apartments and as such, when the 1 bedroom dwellings are discounted, the development caters for 217 no. dwellings which equates to a provision of c. 58 no. childcare places.

The childcare guidelines note that the above threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. In line with these two factors, following the preparation of a childcare needs assessment (enclosed as part of the Social & Community Infrastructure Assessment which accompanies the application as a separate document), the applicant submits that the existing level of childcare throughout the surrounding catchment area is more than capable of catering for the 58 no. childcare places recommended for the development.

The childcare assessment carried out as part of the application identified that the catchment area of the site is in an area already well-served by existing facilities. Most notably, there is a recently opened childcare facility which forms part of the Santry Place development to the immediate south of the site. The childcare assessment details that there are 69 no. confirmed childcare vacancies in the catchment area, 36 no. surplus childcare places in a recently permitted childcare facility at Omni Park. As such, it is considered that there are c. 105 no. existing / permitted childcare places available within walking distance of the development, which is more than adequate to serve the expected demand generated by the development.

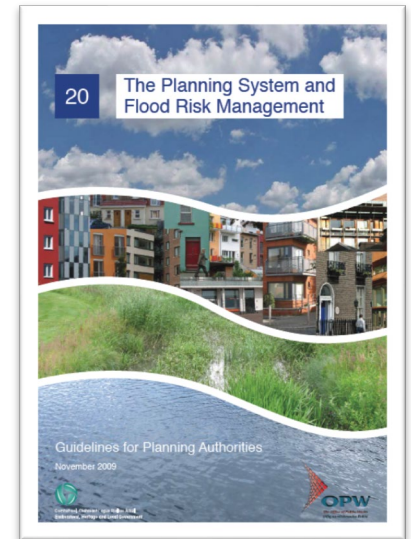
Taking all of the foregoing into consideration, it is put forward that there is sufficient capacity to accommodate the childcare needs that may be generated by the development and that to provide a childcare facility within the proposed development would not be economically viable nor represent proper planning of the site given the existing facilities and available childcare places in the vicinity of the site. For full details, please refer to the Social & Community Infrastructure Assessment which accompanies the application as a separate standalone document.

## 5.6 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)

The Planning System and Flood Risk Management Guidelines provide detailed guidance on the role that flood risk should play at different levels of the planning system. The guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

Planning Authorities must implement these guidelines to ensure that, where relevant, flood risk is a key consideration in development plans and local area plans and in the assessment of planning applications. The guidelines should also be utilised by developers and the wider public in addressing flood risk in preparing development proposals.

These guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process.



### 5.6.1 Statement of Consistency with the Flood Risk Management Guidelines

A Site-Specific Flood Risk Assessment (SSFRA) prepared by DBFL Consulting Engineers accompanies this LRD planning application as a separate standalone document. The SSFRA has been prepared to comply with current planning legislation, in particular the recommendations of the guidelines for full details please refer to same; however, for convenience a summary is provided below.

The site is located within Flood Zone C and the enclosed SSFRA confirms that and therefore a Justification Test is not required. The SSFRA asserts that a regularly maintained drainage system will ensure that the network remains effective and in good working order should a large pluvial storm occur. In the event of extreme pluvial flooding then overland flood routes will direct water towards the open space areas. While the development constitutes 'highly vulnerable' development, it is appropriate for this flood zone and the scheme is designed to ensure that the risk of flooding of the development is reduced as far as is reasonably practicable. The development does not increase the risk of flooding to adjacent areas and roads once mitigation measures are implemented.

Taking the above into consideration, it is put forward that the site is in compliance with the core principles of the Planning System and Flood Risk Management Guidelines and has been subject to a commensurate assessment of risk.

### 5.6.2 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)

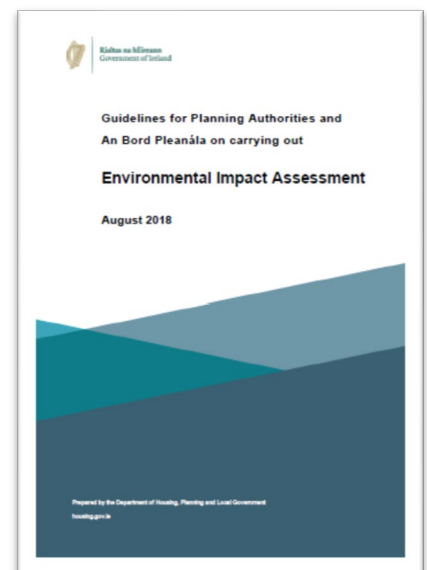
The purpose of the Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment is to provide practical guidance to planning authorities and An Bord Pleanála so that there can be greater consistency in the methodology adopted by consent authorities.

#### 5.6.3 Statement of Consistency:

The development is under the threshold for the requirement of an Environmental Impact Assessment Report (EIAR) as detailed under Part 2(10) (b) of the Planning and Development Regulations 2001 (as amended).

While the proposed development does not alone exceed the required thresholds for the preparation of an Environmental Impact Assessment Report (EIAR), cognisance has been paid to the contextual location of the proposed development and the potential cumulative effects of the proposed development in combination with other developments in the vicinity which have recently been permitted and/or are currently under construction.

Therefore, to ensure a thorough assessment of environmental impacts, an 'Environmental Impact Assessment Report' (EIAR), which also constitutes an Environmental Impact Statement (EIS) for the purposes of the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001-2018, has been prepared by Armstrong Fenton Associates and is submitted as a separate standalone document accompanying this LRD planning application.



The EIAR has been prepared in accordance with Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment as adopted on 16<sup>th</sup> April 2014 as an amendment of Directive 2011/92/EU.

The submitted EIAR considers the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures will be included to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate.

Given all the foregoing it is considered that the development is fully compliant with the guidance for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018), and in accordance with the relevant environmental legislation.

#### **NOTE:**

The following sections 5.7 to 5.10 provide details of other relevant planning guidance documents (that are not Section 28 Ministerial Guidelines) but to which the development has had regard to / complies with.

## 5.7 Quality Housing for Sustainable Communities - Best Practice Guidelines (2007)

The Quality Housing for Sustainable Communities Guidelines promote high standards in the design and construction of new residential developments. The guidelines identify core principles and criteria that have been found, from experience, to be particularly relevant to the creation of high-quality living environments for future residents. Guidance within this document is arranged under five headings as follows:

- Site Selection
- Design Brief, Procurement and Cost Control
- Urban Design Objectives in the Provision of Housing
- Scheme Layout and Design
- Dwelling Design



### 5.7.1 Statement of Consistency with the Quality Housing for Sustainable Communities

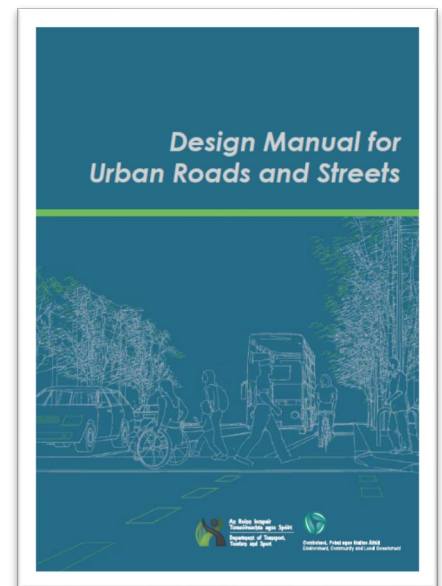
The application is accompanied by a Housing Quality Assessment (HQA) which demonstrates that the proposed dwellings conform to the principles and criteria set out within the Quality Housing for Sustainable Communities guidelines, where applicable.

The application is also accompanied by an Architectural Design Statement, prepared by Davey & Smith Architects, and a Planning Statement, prepared by Armstrong Fenton Associates, which demonstrates development's compliance with the aforementioned guidelines and the Apartment Guidelines – for full details please refer to same.

## 5.8 Design Manual for Urban Roads and Streets (2019)

The Design Manual for Urban Roads and Streets (DMURS) was first published in 2013 and an updated version was released in May 2019. It sets out design guidance and standards for constructing new, and reconfiguring existing, urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

A key element of the DMURS is the need to design roads and streets as destinations rather than traffic corridors and, as such, a focus is placed upon the needs of pedestrians, cyclists, public transport users and enhancement of the public realm.



### 5.8.1 Statement of Consistency with the Design Manual for Urban Roads and Streets.

The principle design guidance of DMURS has been considered in the design of the development and incorporated into the street / building layout. A separate Statement of Compliance with DMURS has been prepared by DBFL Consulting Engineers is submitted with this LRD planning application – please refer to same for details.

It is considered that the proposed layout successfully creates an appropriate balance between the functional requirements of different network users whilst enhancing the ‘sense of place’ and as demonstrated in the enclosed document, the development seeks to prioritise pedestrian and cyclists throughout and around the site in accordance with the policies set out in DMURS.

DMURS principles and considerations within the proposed scheme are also discussed in the Architectural Design Statement prepared by Davey & Smith Architects which accompanies the application as a separate document.

DMURS outlines 4 no. design principles for new developments, which are addressed below:

#### **Design Principle 1 - Connected Networks**

*“To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.”*

#### **Statement of Consistency**

The proposed layout and design ensures the creation of a permeable and legible development for all users. The internal road and street layout combined with the proposed walkways through the open spaces ensures a highly permeable and legible layout for all users.

#### **Design Principle 2 – Multi-Functional Streets**

*“The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment.”*





### **Statement of Consistency**

The layout ensures that all open spaces and routes are overlooked providing a strong sense of safety and creating a self-regulating environment.

### **Design Principle 3 – Pedestrian Priority**

*“The quality of the street is measured by the quality of the pedestrian environment.”*

### **Statement of Consistency**

Pedestrian priority is of the utmost importance. The passive surveillance provided by overlooking dwellings creates a strong sense of safety for pedestrians. Vehicular traffic is not permitted through the site, rather on the edge / perimeter of the buildings thus creating a safe environment for pedestrians, ensuring pedestrian priority and a high-quality living environment.

Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development from multiple points and to access the existing network of pedestrian, cycle and public transport facilities in the environs.

### **Design Principle 4 – Multi-Disciplinary Approach**

*“Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design.”*

### **Statement of Consistency**

The design of the development results from a multi-disciplinary plan-led approach through the co-operation of architects, engineers, ecologists, landscape architects and planners.

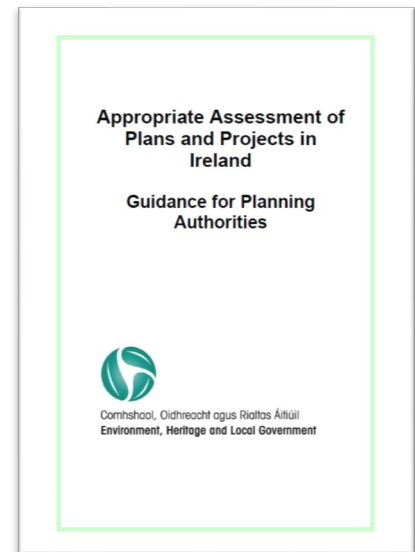
### **Evaluation of Consistency**

DMURS recommendations have been incorporated into the design of the development and the adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of an efficient car parking provision and a high bicycle parking provision actively promotes a modal shift to alternative forms of transport while also creating high-quality open spaces as part of the development. This scheme prioritises pedestrians and cyclists throughout the development.

## 5.9 Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)

The Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009, (hereafter ‘the AA Guidelines’) were prepared jointly by the NPWS and Planning Divisions of DECLG and set out the different steps and stages that are needed in establishing whether a plan or project can be implemented without damaging a Natura 2000 site.

The AA Guidelines indicate the role to be played by professional ecologists and other professionals in identifying and assessing potential impacts. The AA Guidelines address issues of mitigation and avoidance of impacts, and also the Article 6.4 derogation provisions in circumstances in which there are no alternatives and there are imperative reasons of overriding public interest requiring a plan or project to proceed.



### 5.9.1 Statement of Consistency with Appropriate Assessment of Plans and Projects in Ireland

In accordance with the above guidelines, an Appropriate Assessment (AA) Screening Report has been prepared by Enviroguide Consulting and is submitted as a separate document - please refer to same. The previous and current SHD applications for the subject site were also accompanied by AA Screening Reports, which assessed the development's likely impact upon Natura 2000 sites, both individually and in combination with other projects, and considers whether these impacts are likely to be significant on the qualifying interests of the Natura sites.

The submitted AA Screening concludes that there will be no significant effect on the Natura 2000 sites located within 15km of the subject site, therefore, the AA screening process does not need to progress to Stage 2. Please refer to the submitted AA Screening report for full details.

In addition to the above, we note that in his assessment of the previous SHD application on this site for a similar development (Ref. ABP-310910-21), that in assessing that development in terms of AA, the An Bord Pleanála Inspector concluded that: *“the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on North Dublin Bay SAC (000206), North Bull Island SPA (004006), South Dublin Bay and River Tolka Estuary SPA (004024), South Dublin Bay SAC (001266) or any European site, in view of the sites’ Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required. In arriving at this conclusion, I have not had regard to any measures which are intended to avoid or reduce the harmful effects of a project on a European site”.*

Given all the foregoing it is considered that the development is fully compliant with the guidance for Appropriate Assessment of Plans and Projects in Ireland.

## 6.0 Statement of Consistency with Regional Policy

This section details the proposed development's compliance with relevant national planning policy, namely: the Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 and the Transport Strategy for the Greater Dublin Area 2022-2042.

### 6.1 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The NPF is supported by the establishment of statutory Regional Spatial & Economic Strategies for Ireland's three regional assemblies. The Eastern and Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (hereafter E&MRSES) is the relevant regional strategy for the development.

The E&MRSES is a strategic plan and investment framework which aims to shape the future development of the Eastern and Midland Region up to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the State. The strategy identifies that the Eastern and Midland Region:

*"is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region."*

The E&MRSES seeks to achieve the 10 no. National Strategic Outcomes of the NPF through the implementation of 16 no. Regional Strategic Outcomes as detailed in Figure 22. To achieve these Regional Strategic Outcomes, each chapter of the E&MRSES contains Regional Policy Objectives that promote coordinated spatial planning, sustainable use of resources and protection of the environment.

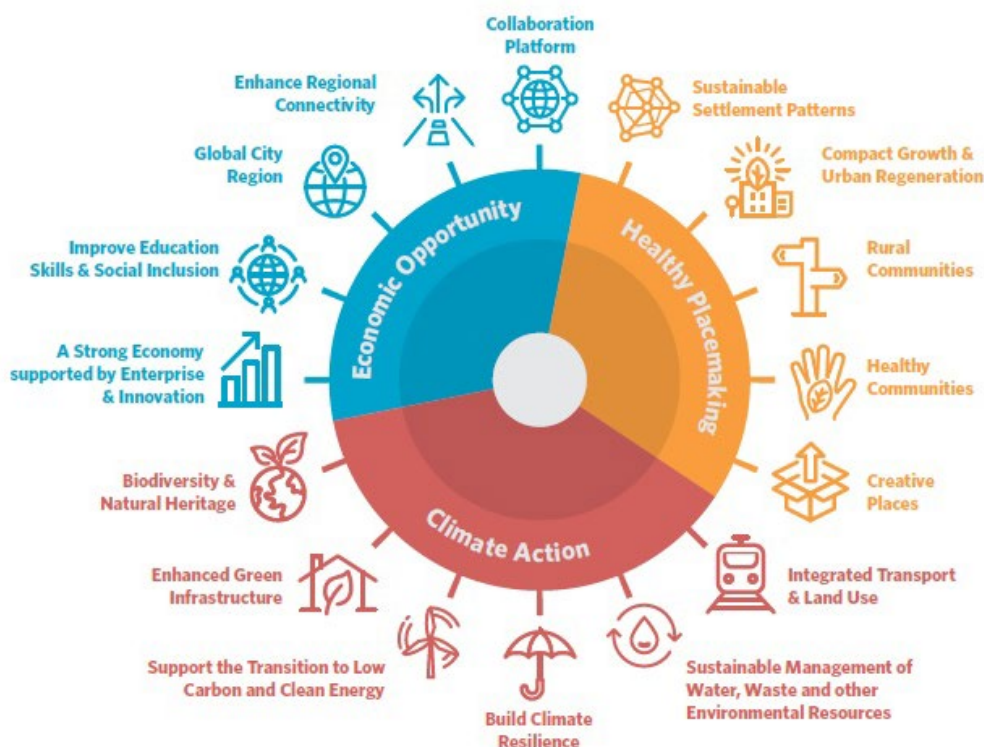


Figure 26 - Regional Strategic Outcomes of the E&MRSES.

The 2016 Census Results states the population of Dublin City as being c. 554,554 persons with the E&MRSES outlining a projected population target of between 638,500 and 655,000 by the year 2031, increasing the city's population by 84,000-100,500 persons over the next 10 years (a 15% - 18% growth rate). This projected growth rate emphasises the need to efficiently develop lands available at higher densities and building heights.

**[NOTE:** We note that since the publication of the E&MRSES, Census 2022 was undertaken, which marked the first time in 171 years that the population of Ireland surpassed 5 million people. Census 2022 also showed that the population of Dublin City was 588,233 which is an increase of 6% (33,679 persons) between April 2016 and April 2022].

The E&MRSES details that the region has a young demographic profile with the overall working age population projected to rise in the next decade. Accordingly, this effects the demand for housing required to support the labour market with family homes and smaller and one-person households also needing to be addressed.

The E&MRSES also details the prevailing state-wide trend of urbanisation, the region saw the continued increase in the share of population residing in urban areas alongside a strong growth in the peri-urban and rural areas surrounding Dublin. The region therefore has a challenge of counter-acting the severe slowdown in the development of new housing stock during the economic recession, which has resulted in supply and affordability pressures across housing tenures, particularly in Dublin.

The growth strategy for the region details the need to: *“Support the continued growth of Dublin as our national economic engine”,* and the need to: *“Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP).”*

In order to achieve the objectives of both the NPF and the E&MRSES, the document reiterates the need to achieve sustainable compact growth through means such as urban regeneration and infill development to revitalise existing settlements. The following Regional Policy Objectives are considered relevant:

**Regional Policy Objective 3.2.** - *“Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.”*

**Regional Policy Objective 3.3.** - *“Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*

Chapter 4 of the E&MRSES sets out the settlement hierarchy and the identification of key growth areas that will see significant development up to 2031 and beyond. With regard to Dublin City and its Suburbs the E&MRSES supports the continued growth of Dublin City with: *“a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration.”* The following Regional Policy Objective is considered relevant:

**Regional Policy Objective 4.3.** - *“Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

Chapter 5 of the E&MRSES has regard to the Dublin Metropolitan Area Strategic Plan (MASP). The E&MRSES notes the challenges of housing supply and affordability in Dublin and states that it is imperative that Dublin builds on its existing strengths as a global metropolitan region to continue to attract and retain investment. The vision of the Dublin Metropolitan Area over the next 20 years emphasises the need to enable regeneration and employment opportunities in established communities where redevelopment and re-intensification occurs, especially in areas of on-going deprivation.

Section 5.3 of the E&MRSES details the guiding principles for the growth of the Dublin Metropolitan Area. Of relevance to the subject application are the following:

**Compact sustainable growth and accelerated housing delivery** - *“To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.”*

**Integrated Transport and Land use** - *“To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of ‘BusConnects’, DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.”*

**Social Regeneration** - *“To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation.”*

The following Regional Policy Objectives are also considered relevant:

**Regional Policy Objective 5.2.** - *“Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.”*

**Regional Policy Objective 5.3.** - *“Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.”*

Section 5.7 of the E&MRSES has regard to housing delivery in the MASP. The delivery of affordable housing is noted as key element of the continued growth and competitiveness of Dublin. The E&MRSES targets at least 7,500 housing units per annum to be provided in the metropolitan area up to the year 2040. The housing strategy for the MASP focuses on the consolidation of sites within or contiguous to the existing built up and zoned area of Dublin City and suburbs in tandem with the provision of public transport, infrastructure, and services. The E&MRSES notes that there is significant capacity to deliver increased residential densities on infill sites and through the re-use of underutilised lands and vacant buildings within the metropolitan area. The following Regional Policy Objectives are considered relevant:

**Regional Policy Objective 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’.*



Other Regional Policy Objectives of relevance are as follows:

**Regional Policy Objective 9.4** - *“Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.”*

**Regional Policy Objective 9.10** - *“In planning for the creation of healthy and attractive places, there is a need to a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for ‘Healthy Placemaking’ and ‘Integration of Land Use and Transport’ as set out in the RSES and to national policy as set out in ‘Sustainable Residential Development in Urban Areas’ and the ‘Design Manual for Urban Roads and Streets (DMURS).”*

### 6.1.1 Statement of Consistency with the E&MRSES

It is considered that the proposed development is wholly consistent with the Regional Strategic Outcomes and Regional Policy Objectives of the E&MRSES, which is demonstrated as follows:

The proposed development provides for new homes at a sustainable location with strategic access to existing employment and services. The development offers an appropriate mix of housing typologies to support the growing trends for smaller households which supports the stated need for smaller households detailed in the E&MRSES and will aid supply and affordability pressures across housing tenures in Dublin.

In support of Regional Policy Objectives 3.2 and 3.3, the proposed development provides for compact growth within the existing built-up area of Dublin and will regenerate an existing brownfield site at an appropriate density, as set out in the SCS, the UD&BHG, and the Apartment Guidelines.

The proposed development supports the growth strategy of the E&MRSES by providing for high density residential development at an appropriate location, as well as a variety of non-residential uses which create employment opportunities within the development. It is therefore considered that the development supports the continued growth of Dublin as our national economic engine and delivers sustainable growth of the Metropolitan Area.

In support of Regional Policy Objective 4.3, the proposed development provides for the consolidation and re-intensification of a brownfield site and caters for high density and people intensive uses within the existing built up area of Dublin City adjacent to existing public transport routes (the Swords Road QBC). Furthermore, in compliance with the vision for the Dublin Metropolitan Area detailed in the E&MRSES, caters for the regeneration of a brownfield site, and provides for and employment opportunities in an established community.

In compliance with the guiding principles for the growth of the Dublin Metropolitan Area contained in the E&MRSES, the proposed development will aid the delivery of 50% of all new homes within or contiguous to the built-up area of Dublin City by providing for higher densities in a built-up area served by existing public transport and the proposed BusConnects route on Swords Road. Furthermore, it is considered that the proposed non-residential uses forming part of the development realise the opportunity for social regeneration.

The proposed development is located adjacent to a proposed BusConnects Corridor with the proposed density and building heights ensuring that the development maximises the efficiency / use of the site. The development promotes pedestrian / cyclist permeability throughout and provides for an ample provision of bicycle parking within the scheme. The development is therefore considered to be wholly compliant with Regional Policy Objectives 5.2, 5.3 and 9.10. of the E&MRSES.

The proposed development provides for an appropriate mix of housing typologies, catering for 1, 2, and 3 bed apartments which will meet the needs of a variety of households and support the provision of lifetime adaptable homes. All of the proposed dwellings are designed in compliance with the standards of the Apartment Guidelines



and achieves the required density of the updated and recently Sustainable Residential Development & Compact Settlements Guidelines. The development is therefore considered to be compliant with Regional Policy Objectives 5.4 and 9.4. of the E&MRSES.

## 6.2 Transport Strategy for the Greater Dublin Area 2022 - 2042

The Transport Strategy for the Greater Dublin Area 2022-2042 (hereafter “Transport Strategy”) was prepared by the National Transport Authority, replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016-2035, which was approved by the then Minister for Transport, Tourism and Sport in 2016

That prior transport strategy set out to contribute to the economic, social and cultural progress of the Greater Dublin Area (GDA) by providing for the efficient, effective and sustainable movement of people and goods. It did that by providing a framework for the planning and delivery of transport infrastructure and services in the GDA. It also provided transport planning policy around which other agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water etc. could align their own investment priorities.

Major projects provided for in the strategy included *inter alia*:

- Luas Cross City;
- The reopening of the Phoenix Park Tunnel Rail Line;
- The on-going roll out of cycle tracks and greenways;
- Investment in bus priority and bus service improvements – BusConnects Dublin;

Under the Dublin Transport Authority Act 2008, the National Transport Authority (NTA) must review its transport strategy every 6 years. Arising from the review of the 2016 plan, an updated strategy was developed which sets out the framework for investment in transport infrastructure and services over the next two decades to 2042.

The current Transport Strategy has been developed to be consistent with the spatial planning policies and objectives set out in the Regional Spatial and Economic Strategy (RSES), which in turn are consistent with the National Planning Framework (NPF). The Transport Strategy is also based on national policies on sustainability as set out in climate action and low carbon legislation, and in climate action plans.

The overall aim of the Transport Strategy is: *“To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports the regional economy”.*

The Transport Strategy includes four overarching objectives to support the delivery of the aforementioned overall aim which are as follows:

1. **An Enhanced Natural and Built Environment** - *To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, increasing walking, cycling and public transport use, and reducing car dependency.*
2. **Connected Communities and Better Quality of Life** - *To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.*
3. **A Strong Sustainable Economy** - *To support sustainable economic activity and growth by improving the opportunity for people to travel for work or business where and when they need to, and facilitating the efficient movement of goods.*

**4. An Inclusive Transport System** - *To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society.*

Chapter 8 of the Transport Strategy refers to “Planning for Sustainable Transport” and sets out the measures that the NTA believes are essential in meeting the objectives of the transport strategy to foster sustainable development and to fully integrate land use planning and transport planning, as a means of reducing travel demand both in terms of numbers of trips made and the length of trips.

Measure Plan3 refers to housing and transport and requires that large planning applications should be accompanied by appropriate Transport Plans or Transport Assessments setting out how the plan or development minimises the need to travel and how public transport, walking and cycling together can cater for the majority of travel demand.

Measure Plan4 refers to Consolidated Development and states that *“In accordance with the NPF and RSES, the NTA will support and prioritise development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services”.*

Chapter 12 refers to public transport, with section 12.2 referring to bus and the core bus corridor programme.

**6.2.1 Statement of Consistency with the Greater Dublin Area Transport Strategy 2022 – 2042:**

The proposed mixed-use development provides an appropriate, effective and sustainable development by virtue of the high-quality design and higher density residential development in an urban location which helps to counter urban sprawl. The proposed development is fully consistent with and supports the core principles of compact growth by providing a mix of uses in a sustainable urban neighbourhood which will provide a new place to live, retail units, medical suite / GP practice as well as community / arts / cultural space and also provides recreational areas (public open space) which is within walking distance of a range of essential and recreational services, public transport, facilities and amenities in Dublin City Centre and Santry.

As set out in preceding sections of this Statement, the site is adjacent to the Swords Road QBC, along which the radial Core Bus Corridor (CBC) of Swords to the City Centre (C Spine) is proposed, where bus journey time is anticipated to be 40 minutes along the entire route once constructed. Furthermore, the Ballymun City Centre Core Bus Corridor (E Spine) is also located within approximately 1.2km west of the subject site.

The Statutory Planning Application for the Swords to City Centre Core Bus Corridor Scheme has been submitted to An Bord Pleanála on 12<sup>th</sup> May 2023, under planning ref. HA06D.317121 and a decision is due on 22<sup>nd</sup> March 2024.

Figure 27:  
BusConnects  
Radial Bus  
Corridor



Figure 28:  
BusConnects Core  
Bus Corridor with  
yellow star  
indicating subject  
site's location

(Source: Figure 12.1  
“BusConnects  
Dublin Core Bus  
Corridors” from  
Transport Strategy)





The development provides for a gross and net density of c. 214 dwellings per hectare, adjacent to existing good quality public transport, in particular the Dublin Bus QBC on Swords Road, as well as the proposed BusConnects route on same. It is therefore considered that the development is fully in compliance with vision and objectives of the Transport Strategy for the Greater Dublin Area 2022-2042.

## 7.0 Local Planning Context

### 7.1 Dublin City Development Plan 2022-2028

This section contains an assessment of the consistency of the proposed development with the Dublin City Development Plan 2022-2028, which was adopted on 2<sup>nd</sup> November 2022 and came into effect on 14<sup>th</sup> December 2022. The Dublin City Development Plan 2022-2028 (hereafter the “CDP”) is the current statutory Development Plan for the area.

#### 7.1.1 Land Use Zoning

Chapter 14 of the CDP deals with ‘Land-Use Zoning’, and the subject site is zoned objective “Z3” (Neighbourhood Centres), the objective of which is: *“To provide for and improve neighbourhood facilities”*.

The CDP notes that Z3 zoned lands generally provide for local facilities within a residential neighbourhood which can range from the traditional parade of shops to larger neighbourhood centres. The CDP goes on to state that Z3 lands: *“can form a focal point for a neighbourhood and provide a range of services to the local population. Neighbourhood centres provide an essential and sustainable amenity for residential areas and it is important that they should be maintained and strengthened, where appropriate. Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level”*.

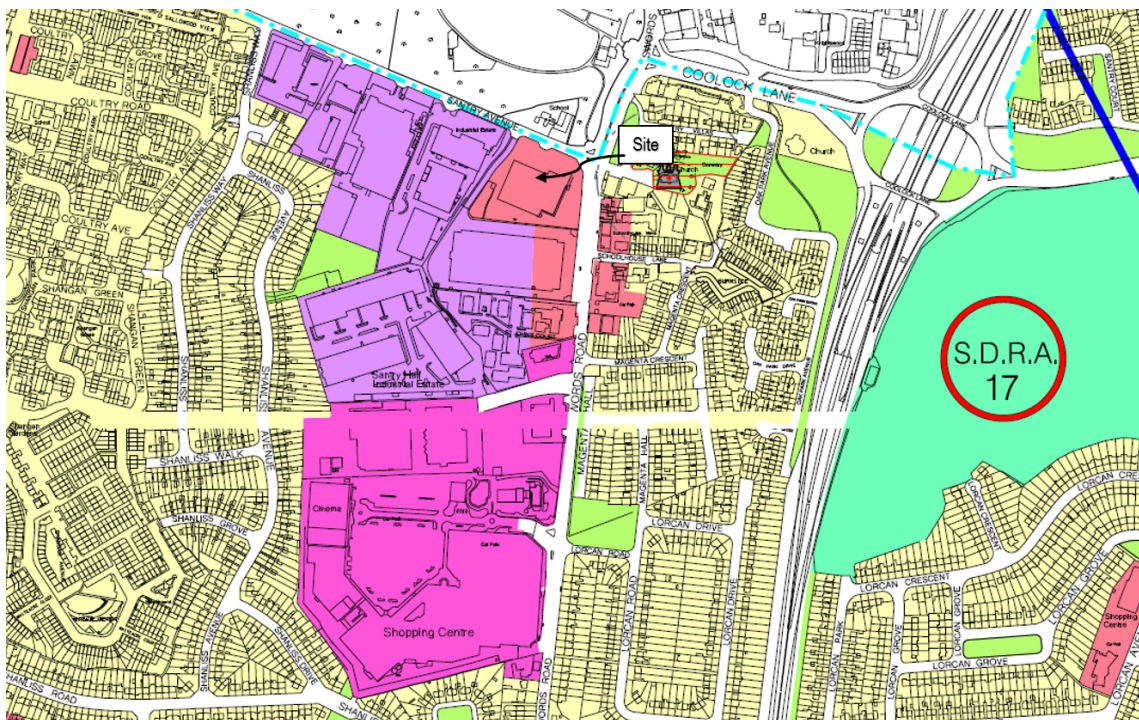


Figure 29 – Copy of Dublin City Development Plan Land Use Zoning Map B for Subject Site

Chapter 14 (Section 14.2) of the CDP sets out the general land use and zoning policies and objectives of this Plan. The Strategic Approach for the city is based upon a number of principles, including *inter alia*:





- *“To ensure that land-use zoning across the city spatially facilitates the aims of the core strategy and the objective to develop a compact, connected, low carbon, and climatically resilient city.*
- *To ensure that land is appropriately zoned in order to accommodate the expected growth needs of Dublin City within the lifetime of the plan and to ensure the protection of community and social infrastructure, and critical ecosystems services, through the application of appropriate land-use zoning designations in order to provide adequate facilities and amenities to meet the growing needs of the city.*
- *To provide for balanced and sustainable development by promoting, in particular, a mixed-use pattern of development with a move away from more traditional forms of single mono-use zoning.*
- *To ensure that the most efficient use is being made of the city’s land in line with the principles of the 15-minute city, and that the redevelopment of under-utilised and brownfield land is promoted in order to consolidate and add vitality to existing centres.*
- *To promote the intensification of development adjacent and close to public transport nodes and corridors in order to minimise trip generation and distribution and to promote sustainable compact urban form.*
- *To ensure that the city’s zoned enterprise and employment lands are integrated with key supporting infrastructure to provide for more intensive forms of employment.”*

The entirety of the subject site is zoned objective “Z3 – Neighbourhood Centres”, the objective of which is “To provide for and improve neighbourhood facilities”.

Under the Z3 zoning, the following are uses that are permitted or open for consideration:

#### Permitted Uses:

*“Assisted living, beauty/ grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, café/tearoom, car park, childcare facility, **community facility**, craft centre/ craft shop, creative and artistic enterprises and uses, **cultural/recreational building and uses**, delicatessen, education, enterprise centre, funeral home, garden centre/ plant nursery, guesthouse, home-based economic activity, industry (light), laundromat, live-work units, **medical and related consultants**, office, off-licence (part), **open space**, primary health care centre, public service installation, **residential**, restaurant, **shop (local)**, **shop (neighbourhood)**, sports facility and recreational uses, training centre, veterinary surgery”. [Our emphasis added].*

#### Open for Consideration Uses:

*“Advertisement and advertising structures, betting office, civic and amenity/recycling centre, cultural, embassy residential, financial institution, garage (motor repair/service), household fuel depot, internet café/call centre, media-associated uses, off-licence, petrol station, place of public worship, postal hotel/motel, public house, take-away”.*

#### Statement of Consistency:

The proposed development site is governed by one land use zoning objective, namely Z3 which provides for Neighbourhood Centre development/uses.

The application site of c. 1.5 Ha is zoned Z3 and the proposed uses to be developed on same include 3 no. retail units, a medical suite / GP Practice unit, community/arts & culture space, and a residential amenity use unit. Each of the aforementioned uses (and quantum/scale of same) is listed as a permitted use under the Z3 land use zoning objective and should therefore be deemed acceptable.

### 7.1.2 Core Strategy

The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence-based “Core Strategy” to be incorporated as part of City / County Development Plans. The purpose of a Core Strategy is to articulate a medium-to longer term quantitative-based strategy for the spatial development of the area of the Planning Authority, and, in so doing, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional development objectives. The central focus of the Core Strategy is on residential development and ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for residential development and the projected demand for new housing during the lifetime of the Plan.

Chapter 2 of the CDP contains the Core Strategy, the purpose of which is “to guide the spatial direction of future development and regeneration in the city in line with the principles of compact growth” and demonstrates how much land is required to meet the residential and employment needs up to 2028.

Section 2.2 of the Core Strategy “Quantitative Data Underpinning the Core Strategy” summarises the key quantitative data used to inform the preparation of the core strategy. The two key sets of figures, required to input to the core strategy, are population and housing. In this regard, the key data sources are:

- Eastern Midland and Regional Assembly: Population Allocation for Dublin City Council (July 2020);
- Department Housing, Local Government and Heritage, Housing Targets for Dublin City Council (December 2020).

Based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the Development Plan must accommodate between 625,750 persons (Low) to 640,000 persons (High) up to 2028. The housing demand calculated sets a requirement for the Development Plan to provide for c.40,000 housing units between 2020 and 2031.

The Core Strategy (section 2.2.2) summarises that “Based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the development plan must accommodate between 20,120 – 31,520 additional persons up to an overall population target of between 625,750 and 640,000 by 2028. The housing demand calculated sets a requirement for the development plan to provide for approximately 40,000 housing units between 2022 and 2028”.

The Core Strategy of the CDP was developed in accordance with the National Planning Framework (NPF), supported by the National Development Plan (NDP), which is the Government’s high-level strategic plan for shaping the future growth and development of the country to the year 2040, as well as the Eastern and Midland Regional Spatial and Economic Strategy 2019 – 2031 (EMRSES), which is a strategic plan to support implementation of Project Ireland 2040 (NPF and NDP), and the economic policies and objectives of the Government, by providing a long-term strategic planning and economic framework for the development of the region.

The Core Strategy of the CDP has been based upon the Department of Housing, Local Government and Heritage issued Section 28 Guidelines titled: “Housing Supply Target Methodology for Development Planning”, December 2020 (‘the Supply Guidelines’) to assist in providing Planning Authorities with the figures and methodology to incorporate national and regional population and housing projections into their statutory functions.

Section 2.3 “Settlement Strategy” of the CDP states that “The Dublin City Settlement Strategy is guided by the policy framework set out at a national and regional level. Dublin City comprises of the central areas and a series of well-established urban villages serving suburban housing located on main transport corridors. This existing pattern of development and movement forms the basis for Dublin’s settlement strategy. Compact growth will be

*promoted throughout the city through appropriate infill development and consolidation of brownfield sites and targeted growth along key transport corridors. Dublin City Council has a unique position in relation to applying the RSES Settlement Hierarchy in that the entire area of the Council falls within Tier 1. Broadly, the settlement hierarchy prioritises development in the inner city and the Key Urban Villages”.*

Table 2.9 of the CDP illustrates the extent of the total housing capacity sites of 45,350 on 501 hectares on available already zoned land, with the subject site is identified in same as one of the sites within the county that has capacity for additional residential development (i.e., “Z3” zoned sites).

### **Proposed Development’s Compliance**

The proposed development will deliver new residential accommodation on an underutilised, brownfield site.

The subject site is located adjacent to the Key Urban Village (KUV) of Santry (Omni).

The subject site is zoned objective Z3 and enjoys close proximity to existing and planned public transport infrastructure and services, with the site well served in terms of public transport provision. There is a Quality Bus Corridor (QBC) running along Swords Road utilised by Dublin Bus routes 6, 33, 41, 41a, 41b and 41c along the R132 Swords Road corridor, travelling in both directions providing links to Dublin City Centre and Ballinteer to the south and Swords to the north. Further, Dublin Bus Route 27b operates along the R132 Road corridor (to the north-east of the subject site) providing links to/from Dublin City Centre and Harristown. The Go-Ahead Ireland bus Route 17a operates along R104 Santry Avenue providing links to/from Blanchardstown and Kilbarrack. All of the aforementioned routes are highly accessible with the closest interchange opportunities being within approximately 5m (Routes 17a, 16, 33, 41a, 41b, 41c) of the subject site whilst route numbers 27b are accessible being within 500m of the subject development site.

The Core Strategy of the CDP seeks to focus development on suitable strategic nodes along existing or planned public transport corridors. The subject lands comprise a strategically located yet underutilised zoned site within the Dublin City and Suburbs settlement boundary.

The proposed residential development will have a residential density of c. 214 units (gross and net) per hectare providing an appropriate mix of unit types and sizes, in addition to open spaces, and mixed, neighbourhood centre uses, and is therefore considered to be consistent with the Core Strategy of the CDP.

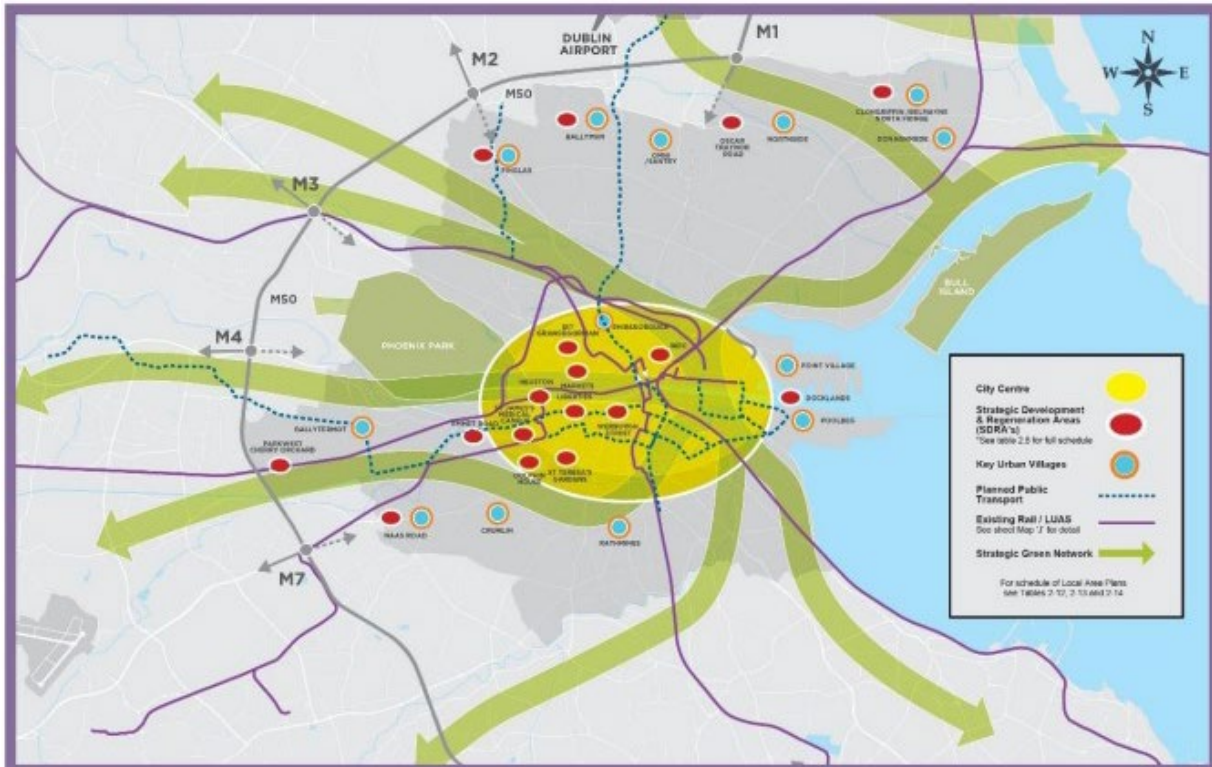


Figure 30 - Core Strategy Map (Source: DCDP pg. 40)

### 7.1.3 Dwelling Mix

The residential element of the development proposal consists of 321 no. apartments provided for in 4 no. buildings, sub-divided into 7 no. blocks (i.e. Blocks A-G), ranging from 7 no. storeys to 13 no. storeys in height, over a basement level car park. A summary of the proposed dwelling mix can be found in Tables 5 and 6 overleaf, while the application is also accompanied by a Housing Quality Assessment (HQA), submitted as a separate standalone document, which contains a fully detailed schedule of accommodation for each individual apartment and demonstrates the compliance of the proposed dwellings with the standards set out in the 2022 Guidelines on Design Standards for New Apartments - please refer to same for further details.



| Block        | Total No. of Dwellings | No. of 1 beds | No. of 2 beds | No. of 3 beds |
|--------------|------------------------|---------------|---------------|---------------|
| Block A      | 51                     | 22            | 23            | 6             |
| Block B      | 38                     | 6             | 26            | 6             |
| Block C      | 53                     | 14            | 39            | 0             |
| Block D      | 44                     | 22            | 15            | 7             |
| Block E      | 49                     | 7             | 42            | 0             |
| Block F      | 52                     | 13            | 39            | 0             |
| Block G      | 34                     | 20            | 14            | 0             |
| <b>Total</b> | <b>321</b>             | <b>104</b>    | <b>198</b>    | <b>19</b>     |

Table 5 – Proposed Dwelling Mix.

| Block        | Total No. of Dwellings | % 1 beds   | % 2 beds   | % 3 beds  | Total %     |
|--------------|------------------------|------------|------------|-----------|-------------|
| A            | 51                     | 43%        | 45%        | 12%       | 100%        |
| B            | 38                     | 16%        | 68%        | 16%       | 100%        |
| C            | 53                     | 26%        | 74%        | 0%        | 100%        |
| D            | 44                     | 50%        | 34%        | 16%       | 100%        |
| E            | 49                     | 14%        | 86%        | 0%        | 100%        |
| F            | 52                     | 25%        | 75%        | 0%        | 100%        |
| G            | 34                     | 59%        | 41%        | 0%        | 100%        |
| <b>Total</b> | <b>321</b>             | <b>32%</b> | <b>62%</b> | <b>6%</b> | <b>100%</b> |

Table 6 - Proposed Percentile Mix.





All of the apartments have a gross floor area which meets with and/or exceed the requirements of the Sustainable Urban Housing: Design Standards for New Apartments 2023 (hereafter '*Apartment Guidelines*'). Internal room areas are also put forward in compliance with the requirements of the Apartment Guidelines. For further details on floor areas and internal room areas, please refer to the Housing Quality Assessment (hereafter 'HQA') which accompanies this application as a separate document.

Private amenity spaces are in the form of terraces at ground floor level and balconies on the upper floors, with the quantum of private amenity space for each apartment meeting with and/or exceeding the requirements of the Apartment Guidelines - for further details refer to the HQA which accompanies the application as a separate document. The location and orientation of each private amenity space has been carefully considered to maximise use of space and receipt of sunlight/daylight throughout the day.

The proposed dwelling mix is put forward in consideration of projected trends for declining household sizes in the State, and the required housing needs for Dublin. The 2018 National Planning Framework (hereafter 'NPF') notes that roughly 70% of Irish households consist of three persons or less, with the average household size in the State projected to decline to c. 2.5 persons by 2040. The NPF also details that household sizes tend to be smaller in urban areas such as Dublin, in comparison to suburban or rural areas, and notes that in Dublin City, c. 80% of all households are made up of 3 people or less. The national need for a range of smaller accommodation is also emphasised in Apartment Guidelines which also notes the long-term move towards smaller average household sizes.

Section 15.9 "Apartment Standards" of the CDP states that "*Apartment schemes make up the majority of the new housing stock in Dublin City. In this respect, it is, therefore, essential that high quality, attractive and liveable apartment units are provided*".

The proposed dwelling mix is also put forward in compliance with the Specific Planning Policy Requirements (SPPRs) i.e. SPPR 1 and SPPR 2 of the Apartment Guidelines, which is also referenced in section 15.9.1 "Unit Mix" of the CDP.

SPPR 1 of the Apartment Guidelines (2022), states: '*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)*'.

We note that the CDP includes 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.*"

The proposed mix of units is therefore in accordance with SPPR 1 of the Apartment Guidelines. Current national planning policy documents such as the National Planning Framework would also support this mix of units for the proposed development given its location and proximity to public transport (most notably existing bus services directly outside the site on Swords Road).

The proposed development provides for apartment units of varying size and type. The proposed mix of unit types is dispersed throughout each of the proposed apartment buildings, with the site layout plan creating a compact urban layout at an efficient density. In accordance with the National Planning Framework, which recognises the increasing demand to cater for one and two person households, a mix of 1 and 2 bed apartments units are catered for, equating to c.94% of the overall proposed unit types.



In line the requirements of Section 3.7 of the Apartment Guidelines which states that no more than 10% of the total no. units in a development can be 2 bed / 3 person units; the proposed development contains 6 no. 2 bedroom / 3 person apartments which equates to less than 2% of the overall dwelling mix, thus being compliant with the Apartment Guidelines.

In addition, we refer to Objective QHSNO11 and Section 15.9.2 of the CDP 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 proposed development includes 212 no. units out of a total of 321 no. which are over 10% minimum areas, which represents 66% of the overall unit provision. Of these 212 no. oversized units, some 81 no. units are designed to be universal design (which also equates to c.25% of the total units provided). Please refer to the submitted architectural plans of the proposed dwellings (which identify the universally designed units with/by red text), and the HQA for details. Therefore, the proposed development is in accordance with the CDP and the specific standards of the Apartment Guidelines, 2022 (SPPR 1), will support the delivery of much need housing in the area and will achieve the proper and sustainable development of the subject site.

It is considered that the proposed dwelling mix ensures a variety of apartment types, sizes, and tenures is delivered in a compact urban layout at an efficient density, addressing the required housing needs of both Dublin City and the State. It is also considered the proposed dwelling mix caters for a diverse and appropriate range of housing needs, in accordance with Criterion no. 4 of the Urban Design Manual which recognises that a successful neighbourhood will be one that houses a wide range of people from differing social groups with a good mix of unit types of varying sizes.

#### **7.1.4 Minimum Residential Development Standards**

The subject development has been designed to accord with residential development standards as prescribed in both the CDP and the Apartment Guidelines, 2023. Please refer to the submitted HQA which is enclosed as a separate document, which provides a detailed breakdown of the quantitative standards affecting the development and includes an assessment of the size of the units, aggregate floor areas of living and bedroom spaces, storage areas and private open space etc.



### 7.1.5 Site Coverage, Plot Ratio

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.

The site coverages and plot ratios set by the CDP for development are noted as being ***“indicative”***, thereby indicating flexibility with respect to their applicability [Our emphasis added].

The CDP 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 CDP 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 proposed development has total floor area of 25,530.1m<sup>2</sup> (including the non-residential elements) and, based upon the gross site area of 1.5 hectares, produces a plot ratio of 1.7. The existing CDP (Table 2 in Appendix 3, Volume 2) states an indicative plot ratio of 1.0 - 2.5 for the Outer Employment and Residential Area. The proposed plot ratio is considered to be appropriate and in line with the indicative ratios stated in the CDP.

The proposed site coverage is c.33.5%, with the CDP stating an indicative site coverage of 45-60% for the Outer Employment and Residential Area.

The proposed development is within the plot ratio limitations prescribed by the CDP demonstrating the appropriateness of the overall development and the extent of the open space provided on the site. The site coverage is slightly lower than the indicative limitations prescribed by the CDP demonstrating the concerted efforts made by the Design Team to ensure that the development maximises opportunities to provide a compact form of development whilst also ensuring that meaningful and useable open spaces area provided for, as well as appropriate generous separation distances from proximate developments.

### 7.1.6 Density

The area of the application site is c.1.5 hectares (c.3.7 acres) on which it is proposed to accommodate 321 no. residential units, along with other appropriate and supporting uses.

The proposed development therefore has a residential density of c. 214 units (gross and net) per hectare based upon an overall site area of 1.5 hectares.

As required by Appendix 3, Volume 2 of the CDP, based upon the proposed dwelling mix, as set out in Table 2, the proposed development is likely to accommodate 1,089 no. persons, which equates to a density of c.726 no. bedspaces per hectare.

The CDP includes the following policies, which support the attainment of greater residential densities and land-use intensities, which also 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 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.”*

In accordance with the Apartment Guidelines, the site can be defined as “central and/or accessible site” given its proximity to a high frequency, high-capacity bus service (see Section 5.2.1 of this Statement for a detailed consideration of same). Such sites are considered suitable for higher density development. No density limits are set out within these guidelines. As such the proposal is broadly in line with the principles as set out in the Apartment Guidelines.

We note that Policy SC10 ‘Urban Density’ of the current CDP seeks to ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (now superseded by the 2024 Sustainable Residential Development and Compact Settlements Guidelines). Policy SC11 ‘Compact Growth’ seeks to *inter alia* promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors. Policy QHSN10 ‘Urban Density’ seeks to promote residential development at sustainable densities in accordance with the core strategy.....having regard to the need for high standards of design...and to integrate with the character of the surrounding area.

In the context of the CDP as a whole, reference is made to meeting the density targets within the National Planning Framework and the Regional Spatial and Economic Strategy, providing opportunities for increased density in a sustainable manner whilst ensuring the highest standards of design as well as the protection of existing amenities and encouraging higher-density development along public transport routes and more intensive development on sites located adjacent to high quality public transport.

There is supporting policy within the CDP which promotes greater densities in sustainable locations such as the subject site. We note section 4.5.3 “Urban Density” of the CDP states the *“NPF recognises that there is a need to increase densities on underutilised lands within core urban areas in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change. It is a requirement under the NPF that at least half of all future housing and employment growth in Dublin be located within and close to the existing ‘built up’ area of the city, specifically within the canals and the M50 ring. The RSES and Dublin MASP also promotes greater densification and more intensive forms of development particularly on infill, brownfield and underutilised lands along key strategic public transport corridors. It is recognised at a national and regional policy level, that land-use and transport are critical inter-linked policy tools that need to work together to better realise*





*economic success, environmental protection and quality of life” [Our emphasis added].*

The CDP also states that *“the objective is to provide opportunities for increased density in a sustainable manner whilst ensuring the highest standards of design as well as the protection of existing amenities and the natural and historical assets of the city. There will be continued consolidation of the city to optimise the efficient use of urban land. Higher densities will be promoted in the city centre, within KUVs, certain SDRAs and within the catchment of high capacity public transport”*. This is supported by the aforementioned policy of the Council: SC10: Urban Density.

In relation to Policy SC10 of the CDP, it could be argued that the proposed development contravenes this element of the Development Plan in light of a reference to an upper density limit of 120 units/ha on lands in the Outer Suburbs (as Table 1 of Appendix 3 of the CDP refers). However, it is put forward that the general thrust of the Development Plan, which seeks to provide for higher densities at appropriate locations, in particular on sites well served by public transport, and seeks to apply performance criteria to determine appropriate densities for individual sites, and in determining the acceptability of the density proposed for the subject site, this Statement of Consistency has clearly considered the proposed development in light of these performance criteria (in preceding sections of this Statement), and demonstrates that the proposed development generally complies with same, and therefore the proposed density is in compliance with the CDP, and does not materially contravene same.

Under the previous SHD application for the subject site for 350 no. dwellings and a resultant density of 233 units/ha, the Planning Authority assessed that application against the provisions of the previous City Development Plan (2016-2022) and stated the following: *“With regard to the proposed density, the proposed figure of 233 units per hectare (plus commercial development at ground floor) is high. The planning authority does not have any objection in principle to a high-density development on this site, given its close proximity to a high frequency public transport corridor. The changing character of the area is taken into account, and it is noted that permission has been granted by ABP for a Strategic Housing Development at lands to the north-east of the Omni Shopping with a density of 250 residential units per hectare plus an aparthotel and a density of 250 residential units plus ground floor commercial at the former Swiss Cottage site on the opposite side of Swords Road. The density proposed in this proposal is comparable to these recently permitted developments which have proven acceptable to An Bord Pleanála”*. We note that the Planning Authority did not consider the proposed density a material contravention of the previous Development Plan, notwithstanding similar references to the Sustainable Residential Development Guidelines in Policy QH1, Policy SN4, and within Section 16.4 ‘Density Standards’ of the previous Development Plan (2016-2022).

Section 15.5 of the current CDP states that *“Development proposals should make the most efficient use of land by delivering an optimum density and scale of development for the site having regard to its location within the city. Certain areas of the city, such as those located adjacent to high quality public transport will lend themselves to a more intensive form of development. Similarly, brownfield and infill sites can also achieve greater densities subject to the location and proximity to other services. Appendix 3 of the plan sets out guidance regarding density and building height in the city in order to achieve sustainable compact growth”* [Our emphasis added].

Section 15.5.1 of the CDP refers to brownfield, regeneration and large comprehensive sites. The subject site is considered to be a brownfield site, which was acknowledged by the An Bord Pleanála Inspector under the previous SHD application (Ref. ABP-310910-21), where he stated that *“The proposal for 350 no. residential units on the site equates to a density of approx. 233 / ha. Having regard to the central / accessible urban location and **brownfield** nature of the site, proximity to services and amenities and public transport services, such densities are regarded as acceptable and in accordance with national, regional and local planning policy. I also note the objectives of recent Government Policy set out in Housing for All which identifies the need for construction of an average of 33,000 homes per annum nationally until 2030 to meet the targets outlined in the National Planning. The consolidation of existing built-up areas in the manner proposed will be an important contributor to the achievement of such targets in a more sustainable manner”*. The CDP states that *“brownfield sites are generally referred to as previously developed lands that are not currently in use. Quite often these brownfield sites are*



*located in areas in need of regeneration. These sites often contain derelict or vacant buildings which are underutilised and in need of redevelopment. Brownfield lands have the ability to regenerate and rejuvenate large portions of the city through redevelopment”.*

Section 15.5.5 of the CDP “Density” states that *“Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 guidelines which seek to consolidate development within existing urban areas. Higher density development allows land to be used more efficiently, assists in regeneration and minimises urban expansion. Higher densities maintain the vitality and viability of local services and provide for the critical mass for successful functionality of public transport facilities. New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity. An urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods”.*

The proposed density is put forward with regard to the guidance set out in the recently published SCS Guidelines which sets out the density ranges for Dublin and Cork, given their overall size and scale. Under Table 3.1 of the new Guidelines, “Areas and Density Ranges Dublin and Cork City and Suburbs”, the subject site can be described as “City – Urban Neighbourhoods”: *“The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations, (iii) town centres designated in a statutory development plan, and (iv) **lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area.** These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork”* [Our emphasis added].

We note that Section 3.4 “Refining Density” refers to the application of density in the consideration of individual planning applications, and states that *“the density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport”.* The first step is to consider the proximity and accessibility to services and public transport. The SCS Guidelines state that *“while densities within the ranges set out will be acceptable, **planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area**”* [Our emphasis added]. Table 3.8 “Accessibility” of the SCS Guidelines provides definitions for terms used to define accessibility to allow for consistent application, while the SCS Guidelines also states that *“The approach to refining density should be informed by the capacity and wider network accessibility of public transport services at a node or interchange (number of options, capacity and peak hour frequency) and the journey time to significant destinations (e.g. city centre or significant employment location)”.*

The necessary definitions are provided in Table 3.8, including the term ‘High Capacity Public Transport Node or Interchange’, which is defined as including lands within 1500 metre walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop. The proposed development site is within the Metropolitan Area of Dublin City, along a prominent public transport route into the city, within the existing built-up urban environs of Dublin. Swords Road, which abuts the subject site to the east, is an established entrance route into Dublin city centre from the north of city and caters for high frequency public transport i.e. the Swords Road QBC, while the proposed BusConnects Corridor is also planned along this route. The subject site has good, proximate access to a wide range of services, facilities, employment and education opportunities, and amenities, and therefore the scale and quantum of development proposed for the subject site achieves compact growth. The development provides for a density of c. 214 no. dwellings per hectare. It is considered that given the location of the site in close proximity to a number of surrounding services, including being located along a public transport corridor and having access to proximate public transport links, that the proposed density on site is appropriate in this instance, and accords with the guidance set out in the SCS Guidelines.

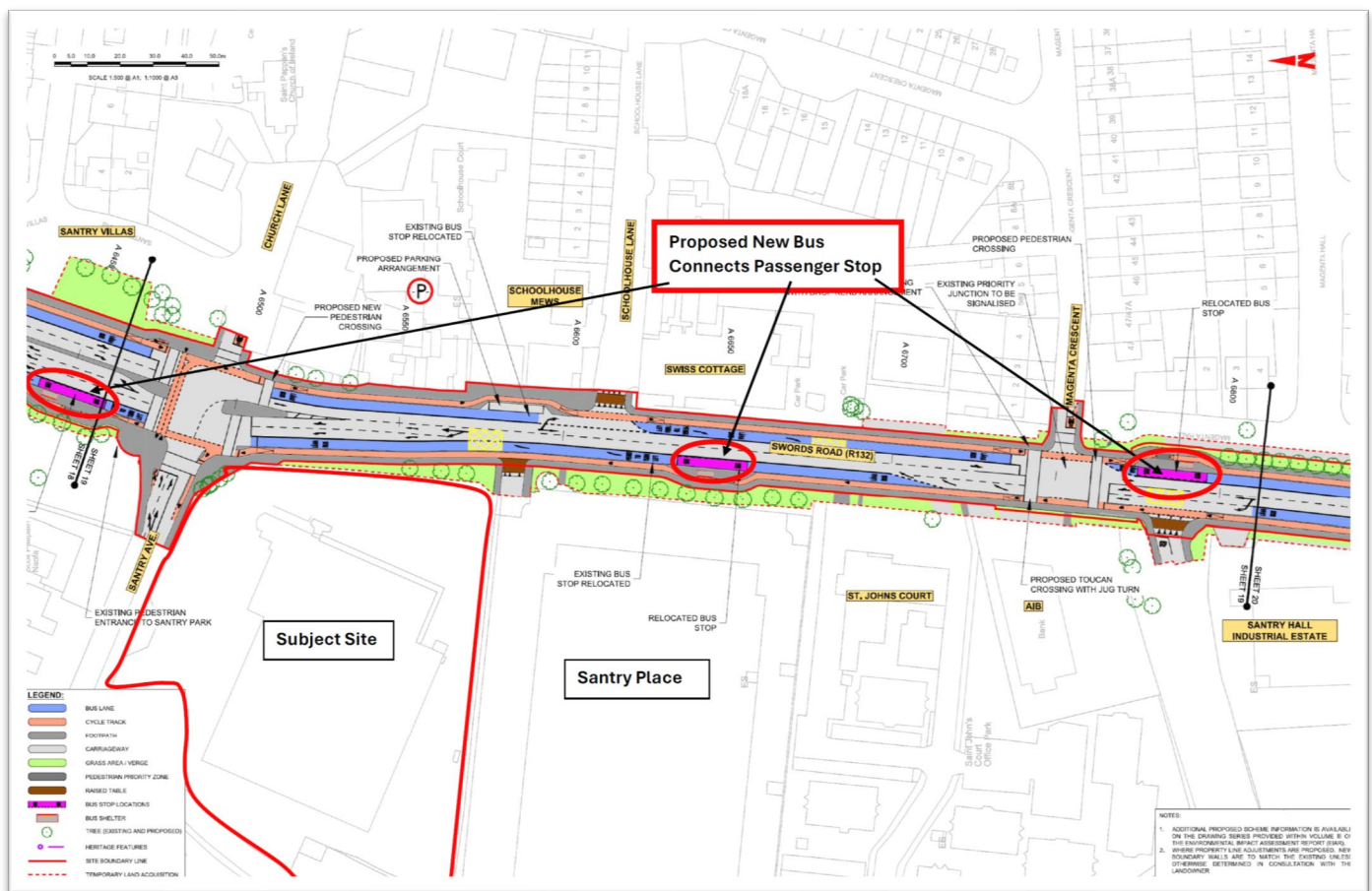


Figure 31 – Extract from Swords to City Centre Core Bus Corridor Scheme General Arrangement Drawings, May 2023 (Drawing no. BCIDB-JAC-GEO\_GA-002\_XX\_00-DR-CR-0019 by Jacobs for NTA). Subject site is identified, indicatively outlined in red with 3 no. proposed bus stops on the Swords Road Core Bus Corridor identified in close proximity to the subject site i.e. within c.65m.

We note from the previous/current SHD proposals for 350 no. dwellings (Ref.s ABP-310910-21 & ABP-314019-22 respectively), which equated to a density of 233 units per hectare that the Planning Authority stated the following in relation to same (under both applications): “with regard to the proposed density, the proposed figure of 233 units per hectare (plus commercial development at ground floor) is high. The planning authority does not have any objection in principle to a high density development on this site, given its close proximity to a high frequency public transport corridor. The changing character of the area is taken into account and it is noted that permission has been granted by ABP for a Strategic Housing Development at lands to the north-east of the Omni Shopping with a density of 250 residential units per hectare plus an aparthotel and a density of 250 residential units plus ground floor commercial at the former Swiss Cottage site on the opposite side of Swords Road. The density proposed in this proposal is comparable to these recently permitted developments which have proven acceptable to An Bord Pleanála”.

Furthermore, the An Bord Pleanála Inspector in his report under SHD planning ref. ABP-310910-21 also stated “The proposal for 350 no. residential units on the site equates to a density of approx. 233 / ha. Having regard to the central / accessible urban location and brownfield nature of the site, proximity to services and amenities and public transport services, **such densities are regarded as acceptable** and in accordance with national, regional and local planning policy. I also note the objectives of recent Government Policy set out in Housing for All which identifies the need for construction of an average of 33,000 homes per annum nationally until 2030 to meet the targets outlined in the National Planning. The consolidation of existing built-up areas in the manner proposed will be an important contributor to the achievement of such targets in a more sustainable manner”. [Our emphasis added].



It is put forward that national planning policy focuses on the provision of sustainable residential development, including the promotion of layouts that prioritise sustainable transport modes by reducing car use and are universally accessible and legible for ease of movement. In this regard, the development is considered to be highly accessible for future occupants, as well as the existing community, with a permeable layout, both internally and externally as new linkages are provided to surrounding land uses, and is therefore compliant with national planning policy. The submitted TTA provides details of the existing and planned public transport infrastructure to serve the site with adequate capacity within same to cater for the proposed development, which further reinforces that the proposed development is acceptable and accords with national planning policy which seeks to increase densities and compact forms of development in existing urban areas.

The proposed density is also put forward with consideration to the guidance set out in the National Planning Framework (NPF), the Urban Urban Development and Building Heights Guidelines (UD&BHG), the Apartment Guidelines, all of which promote compact development in existing urban areas by increasing building heights, densities and compact forms for development in order to accelerate housing supply. In particular Objective 35 of the NPF which states the need 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.”*

With regard to the sequential approach to development, it is notable that the subject site is located in a built up, urban area with mixed land uses and existing developments surrounding the site to the north, south, east and west. The site is zoned Z3 “Neighbourhood Centres” in the existing CDP. The proposed development is therefore considered to be in compliance with the sequential approach to the development of land and makes efficient use of available lands at a prominent location that is well served by existing and planned public transport and local services.

The proposed development is also considered to be making the most efficient use of the lands available, increasing residential development in an existing urban area and providing for high density residential development in a key location, alongside non-residential uses that are employment generating and appropriate for community/cultural uses, which will also serve the needs of future residents on site.

Sustainable neighbourhoods require a range of community facilities, while each neighbourhood needs to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. The site is well served by existing infrastructure available in the Santry area, as detailed in the Social Infrastructure Assessment which accompanies this submission as a separate, standalone document.

Appendix 3 of the CDP “Height Strategy” refers to density, stating *“Appropriate densities are essential to ensure the efficient and effective use of land. It is important to make the best use of the city’s limited land supply in order to meet the need for new homes, jobs and infrastructure required by the city’s growing population. More compact forms of development, ensuring a mix of uses, the containment of ‘urban sprawl’ and achieving social and economic diversity and vitality are critical for the future of the city and addressing climate change”*. The CDP also states: *“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”*.

Appendix 3, section 3.2 “Density” of the CDP also asserts that *“The strategic approach is that the highest densities should be located at the most accessible and sustainable locations. Sustainable densities in accordance with the standards set out in the Guidelines on Sustainable Residential Development in Urban Areas 2009 will be supported”, and “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”* [Our emphasis added].

It is considered that the subject site is wholly suitable to providing higher density residential accommodation in proximity to high frequency public transport, employment locations, services and facilities, which can meet the housing needs of a greater number of persons and will address the acute housing shortage and the significant demand that exists in Dublin. In addition, the provision of community/arts/cultural space, retail units and a GP/medical practice will significantly enhance the provision of community facilities and social infrastructure in the wider area. The opening up of the site to the public, through the creation of a new urban quarter at this prominent junction location and assimilating with the adjoining Santry Place development, as well as creating new public open spaces will also significantly enhance the local area. Therefore, the proposed development will contribute to healthy place making and will improve the liveability and identity of the area.

Appendix 3, section 3.2 “Density” of the CDP contains Table 1 “Density Ranges” (refer to Fig. 32 below) states, that **as a general rule**, the following density ranges will be supported in the city: [Our emphasis added]

| 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                           |

Figure 32 – Copy of Table 1: Density Ranges from Appendix 3 of CDP

It is acknowledged that the subject site is located in the Outer Suburbs as per Table 1, of Appendix 3, and that the density range for the ‘Outer Suburb’ is 60 to 120 units/ha. However, it is considered that these density ranges set out in the CDP are a generality, and where higher densities are proposed, that are denser than the surrounding area, as is the case in this proposed development, the performance criteria in Table 3 of Appendix 3 shall apply. Full details of the proposed development’s compliance are set out overleaf in section 7.1.7 – refer to Table 7 (page 113).

It is put forward that the CDP policy clearly states, in relation to Table 1, that “*as a general rule, the following density ranges will be supported in the city*”. In this regard the density ranges indicated are not hard limits, whereby 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, Appendix 2 of the CDP (Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale). The CDP also refers to plot ratio as measures that can be considered in terms of assessment of density. In this case the plot ratio and site coverage are within the indicative ranges identified for the Outer Employment and Residential Area (1.7 and 33.5% respectively). In the case of open space, the development provides over the required 10% of public open space required by the Z3 zoning, in addition to communal open spaces on site. The performance criteria under Table 3 “Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale” from Appendix 3 of the CDP are elements that are fully addressed in the following section 7.1.7 (refer to Table 7) of this Statement of Consistency, and given the proposed development’s compliance with same, the density proposed is considered acceptable.

The subject site is located on the western side of the Swords Road and the southern side of Santry Avenue, at the junction of these two roads, with frontage onto both. The Outer City (Suburbs) is recognised as being outside of the canal ring where heights of 3 to 4 storeys will be promoted as the minimum, and 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 etc. It is considered that the size and location



of the site, being adjacent to good public transport services, employment and a wide range of amenities and services, provides an opportunity for a high density scheme at this location. In addition, the approach to the distribution of scale and massing, distribution of building height across the scheme and the assimilation of the proposed scheme with the adjoining Santry Place development is also considered appropriate.

Through the assessment of the previous SHD application for the subject site (Ref. ABP-310910-21), the site has been acknowledged as being a “public transport corridor”. Therefore, in light of same, the current CDP also acknowledges that there is recognised scope for the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors including *inter alia* Bus connects/Core Bus Corridors (CBC’s), and that locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, with the subject site being adjacent to an existing public transport corridor (Swords Road QBC), which is also a proposed BusConnects Core Bus Corridor. The existing QBC running along Swords Road is utilised by Dublin Bus routes 16, 33, 41, 41b, and 41c. The aforementioned bus routes travel along the Swords Road corridor which lies to the immediate east of the subject site. Bus route numbers 16, 16c, 49, 54a and 9 are highly accessible being within c.65 metres walking distance from the subject site (being directly adjacent to the adjoining Santry Place development). All the aforementioned Dublin Bus operated bus services operate on a daily basis and offer relatively frequent schedules – ranging from every 10-15 mins and every 20-25 mins.

It is put forward that the Planning Authority actively encourages higher densities on appropriate sites across the city, accompanying highest quality of urban design on accessible, connected sites. This is reinforced by **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 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.*

It is considered that the subject site is suitable site for increased densities based on both national and local planning policy, and it is respectfully put forward that there is no reason to consider that the proposed density is excessive. The proposed development in this location does not, in our opinion, contradict density standards contained in the current CDP which advocates an approach of consolidation and densification in the city, while the proposed density also complies with Government policy to increase densities on underutilised lands, within core urban areas in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change.

Taking into account all of the foregoing information regarding national planning policy, the planning history and context of the subject site, the proximity of the site to a wide range of services and amenities and its immediate proximity to public transport services, it is considered that the proposed residential density of 214 no. dwellings per hectare is appropriate and ought to be granted permission. It is put forward that the proposed development is in full compliance with national planning guidance and policy regarding residential density. Furthermore, it is put forward that the proposed development complies with the CDP’s requirements regarding density which consistently refers to higher densities being promoted within the catchment of high-capacity public transport services, and also states that “*Dublin City Council will support higher density development in appropriate urban locations in accordance with the NPF, RSES and the Section 28 guidelines which seek to consolidate development within existing urban areas*”. In line with same, it is also put forward that the proposed development complies with Appendix 3, section 3.2 “Density” of the CDP and its Table 1 “Density Ranges” which states, that its density ranges will be supported **as a general rule** [Our emphasis added]. In addition, the proposed development fully complies with the performance criteria under Table 3 “Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale” from Appendix 3 of the CDP, which are elements that are fully addressed in the following section 7.1.7 (refer to Table 7) of this Statement of Consistency, and given the proposed development’s compliance with same, the density proposed is considered acceptable. This statement clearly sets out (a) how the proposed development fully complies with national planning policy regarding density and (b) how the proposed





development results in an appropriate form of residential density that accords with the CDP, and therefore the permission being sought can be granted by the Planning Authority in full compliance with their Development Plan.

Taking all of the foregoing into account, it is considered that the proposed density of 214 no. units per hectare is appropriate and in compliance with the relevant planning policy and guidance for density as set out in the CDP.

### 7.1.7 Building Height

With the exception of the proposed one storey residential amenity use unit located between Blocks A & D, the proposed development caters for 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), ranging from seven to thirteen storeys in height, which are as follows:

- Block A is a 13 storey block, (c.44.2m max height), consisting of 51 no. apartments, with 2 no. retail units located on the ground floor.
- Block B is a 7 storey block, (c.24.4m max height), consisting of 38 no. apartments, with 1 no. retail unit and 1 no. medical suite / GP Practice unit located on the ground floor.
- Block C is a 7 storey block, (c.22.9m max height) consisting of 53 no. apartments.
- Block D is an 8 storey block, (c.26.3m max height), consisting of 44 no. apartments,
- Note: c. 583m<sup>2</sup> of ground floor, community/arts & culture space is proposed at ground floor of Blocks C & D.
- Block E is an 8 storey block, (c.26.2m max height), consisting of 49 no. apartments.
- Block F is a 7 storey block, (c.22.9m max height), consisting of 52 no. apartments,
- Note: c.877m<sup>2</sup> of ground floor, community/arts & culture space is proposed at ground floor of Blocks E & F
- Block G is a 7 storey block, (c.22.9m max height), consisting of 34 no. apartments.

| Block | Building Height – Storeys | Max Building Height – Metres (m) | No. of Dwellings |
|-------|---------------------------|----------------------------------|------------------|
| A     | 13                        | 44.2m                            | 52               |
| B     | 7                         | 24.4m                            | 37               |
| C     | 7                         | 22.9m                            | 53               |
| D     | 8                         | 26.3m                            | 44               |
| E     | 8                         | 26.2m                            | 49               |
| F     | 7                         | 22.9m                            | 52               |
| G     | 7                         | 22.9m                            | 34               |

**Table 7 – Proposed Building Heights.**

The Apartment Guidelines acknowledge the importance of existing, urban, brownfield sites in strategic locations in close proximity to existing public transport facilities. Section 2.0 of these Guidelines states that in order to “*meet housing demand in Ireland, it is necessary to significantly increase supply*”, and notes that this is “*a key pillar of the overarching Housing for All Plan*”. This section of the Guidelines also states that “*apartments are most appropriately located within urban areas*”, and notes that “*the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services, are also particularly suited to apartments*”.

Section 2.3 of the Guidelines goes on to state that “*City and County Development Plans must appropriately reflect this, in the context of the need to both sustainably increase housing supply and to ensure that a greater proportion of housing development takes place within the existing built-up areas of Ireland’s cities and towns. This means making provision for more residential development to take place on infill and brownfield sites and as refurbishment of existing buildings, to increase urban residential densities*”.

Following on from the above, the Apartment Guidelines identify the types of location in cities and towns that may be suitable for apartment development, having regard to the following broad description of proximity and accessibility considerations:

#### **Central and/or Accessible Urban Locations:**

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

- *Sites within walking distance (i.e. up to 15 minutes or 1,000 - 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions; (NOTE: the subject site is approximately 500m from the Omni Shopping Centre, and the following are within a c.1km-1.5km radius of the subject site: Gulliver’s Retail park, Airways Industrial Estate, Clonsaugh Business & Technology Park, Beaumont Hospital and DCU);*
- *Sites within reasonable walking distance (i.e. up to 10 minutes or 800 - 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); (NOTE: the site is located approximately 4km walking (15 cycling) distance to the north of Drumcondra Railway Station. The station is located approximately 1.5km north of Dublin city centre and serves the following routes: (i) Dublin Connolly-Sligo, (ii) Dublin-Maynooth, Longford and M3 Parkway and (iii) Grand Canal Dock and Dublin Heuston – Portlaoise.*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10-minute peak hour frequency) urban bus services (NOTE: directly outside of the site, on Swords Road is an existing QBC with 5 different bus services available and is also a proposed BusConnects route).*

Based on the above, the proposed development site is considered to be well served by public transport infrastructure and an appropriate location for high density residential development. This has been acknowledged in the assessment of the previous SHD application on the subject site (Ref. ABP-310910-21).

The current CDP 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 2016-2022 CDP. The proposed building heights have been considered within the urban context and to achieve optimum density for the proposed development, with varied building heights provided throughout to provide a varied and interesting design. It is put forward that the proposed development, with heights ranging from 7 up to 13 storeys explores the potential for increased height whilst being cognisant of the surrounding context of the subject site.

Section 4.5.4 of the CDP *“Increased Height as Part of the Urban Form and Spatial Structure of Dublin”* states: *“The Urban Development and Building Height Guidelines for Planning Authorities published in December 2018 state that increasing prevailing building heights has a critical role to play in addressing both the scale and density of development. The guidelines also note that increased building height is a factor in assisting modern place-making and improving the overall quality of our urban environments. The strategic approach, therefore, is to promote more intensive forms of development, including increased height, whilst ensuring that high quality places and a good quality of life are achieved. Policy and guidance regarding building height is set out in Appendix 3. The City Council advocates that when considering building height, regard must be had to the prevailing context within which the site is located and broader consideration must also be given to potential impacts such as overshadowing and overlooking, particularly in the lower scaled suburban areas of the city”.*

The following are stated policies of the CDP regarding building height:

- **Policy SC14 - Building Height Strategy:** *“To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4”.*
- **Policy SC16 - 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”.*

Section 15.5 of the CDP states that *“Certain areas of the city, such as those located adjacent to high quality public transport will lend themselves to a more intensive form of development. Similarly, brownfield and infill sites can also achieve greater densities subject to the location and proximity to other services. Appendix 3 of the plan sets out guidance regarding density and building height in the city in order to achieve sustainable compact growth”.*

We also note that Appendix 3 of Volume 2 of the existing CDP *“Achieving Sustainable Compact Growth Policy for Density and Building Height in the City”* identifies the height strategy for the city and the criteria in which all higher buildings should be assessed.

Appendix 3 of the CDP has sought to accommodate a more flexible approach to the attainment of height 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.”*

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 parts of the local environs. The proposed heights, which are detailed throughout this Statement of Consistency and the accompanying Planning Statement and in the materials prepared by Davey+Smith Architects, range from 7 no. up to a max of 13 no. storeys i.e. only on Block A. As a result of careful modulation of the built-form and appropriate separation distances, it is considered that these heights are respectfully and sympathetically achieved, cognisant of (a) the changing nature of the local environs through various permitted developments in recent years and (b) surrounding properties. 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 prominent site, at a prominent junction location, which does not represent sustainable development of prime brownfield lands.



We note that the existing CDP recognises the role of the UD&BHG and the Specific Planning Policy Requirements (SPPRs) contained therein and notes that the UD&BHG state that it is inappropriate for a development plan to include generic height limits across their functional areas.

The existing CDP also recognises the scope for height intensification and the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors including for Bus connects/Core Bus Corridors (CBC's) and states: *"In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan"*. (**NOTE:** directly outside of the site, on Swords Road is a QBC with 5 different bus services available, including bus services within c.65m metres walking distance from the subject site).

It is considered that the application site offers an ideal opportunity to accommodate additional height without undue detriment to neighbouring properties, having regard to its Z3 land use zoning, the prominent position of the site addressing both Swords Road and Santry Avenue, and its location next to existing high quality public transport services on an established entrance route into the city centre, including the proposed BusConnects Corridor.

The proposed development has been designed with careful consideration to the surrounding environs of the site. The high point within the development, i.e. Block A at a max height of 13 storeys with the top floor accommodating only an outdoor terrace (c.44m) forms a strong urban anchor and landmark at the corner where it bookends both Santry Avenue and Swords Road and announces the entrance to the city. Previous iterations of the design explored the positioning of the high point at the centre block C/D, which modulated the change in scale; however, following extensive consultation with both Dublin City Council and An Bord Pleanála, the high point has been relocated to the corner to emphasize the gateway nature of the site. This creates a stronger architectural impact at this important junction that will contribute to the placemaking of the area.

The varying heights of the proposed buildings break up the mass and volume of the scheme, with only one tall building of 13 storeys proposed, which will act as a landmark to the prominent corner at the junction of Swords Road and Santry Avenue. The proposed height of 7 storeys at the southern end of the scheme, marries in with the adjoining Santry Place, currently under construction, but also presents an appropriate urban street edge onto Swords Road. The introduction of 8 storey buildings fronting onto Santry Avenue (Blocks D & E) sit side by side of the tallest building (Block A) thus creating a variance and natural transition between 7 and 13 storeys.

The punctuation in the site layout between buildings allows for light penetration into the site but also replicates the positioning of the buildings to the south in Santry Place. The proposed site layout plan provides for connectivity and permeability into Santry Place and for urban open spaces to be created. The overall design proposed allows for this site to be developed as a landmark setting for Santry thus creating a sense of place in itself.

It is considered that the areas within the scheme, in tandem with the neighbouring permitted scheme south of the application site, will reinforce the concept of developing a new urban quarter in this northern location of Santry, providing for a sense of variety and blocks in terms of appearance, layout, while the distribution of materials has been judiciously considered as part of the design process. The development now put forward for permission provides for an appropriate variety of housing typologies which have been developed to ensure that the scheme provides for high quality design, based upon the 12 urban design criteria set out in the Urban Design Manual (2009), the details of which have already been set out in this Statement of Consistency (section 5.4) and the Architectural Design Statement which accompany the application.

It is considered that the application site offers an ideal opportunity to accommodate additional height without undue detriment to neighbouring residential properties, having regard to its Z3 land use zoning, the prominent position of the site addressing both Swords Road and Santry Avenue, and its location next to existing high quality public transport on an established entrance route into the city centre, including the proposed BusConnects Corridor.



The proposed development has been designed with careful consideration to the surrounding environs of the site. The scale and form of existing buildings adjacent to the site are typically four to six to seven storey residential, and mixed uses, with some older one and two storey local centre uses, warehousing and residential in the local environs. In order to tie in with the existing streetscape along Swords Road, the façade facing onto the street is comprised of brick volumes that ties in with the existing Santry Place development to the immediate south. This allows the block to integrate into the streetscape cohesively.

The higher buildings give the open spaces a strong sense of enclosure within the scheme, with the architectural treatments of the facades giving a definite character to the development. As the maximum height of 13 storeys is on the prominent junction location of Swords Road and Santry Avenue, it will act as a landmark / gateway to the development announcing ones arrival to Santry.

The CDP also states that: *“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.”* In order to demonstrate compliance with Table 3 of Volume 2, Appendix 3 of the CDP, Table 8 overleaf has been prepared, which sets out the objectives and criteria of Table 3 “Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale” from Appendix 3, 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 CDP:

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.



**Table 8 - Compliance with Table 3: “Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale” from Appendix 3 of the Development Plan:**

| Objective  | Criteria  | Compliance   |
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| 1 - To promote development with a sense of place and character | Respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints. | <p>The subject site occupies a prominent location which, while currently developed, is considered underutilised. Given the scale of surrounding development, the existing use of the site is lost and provides no definition or sense of place. The current industrial, low level, and enclosed nature of the site will be significantly improved by the proposed development, as it will be opened up to activity and animation.</p> <p>The subject site is prime for redevelopment and the delivery of the proposed high-quality scheme will assimilate into the area. The scheme will promote a sense of place and character especially due to the animation of activity provided along the streetscapes to the north and east, opening up the site for the public to utilise.</p> <p>A sense of place will be achieved will be through the positioning of the varied building heights and by the design of the hard and soft landscape. The combination of these factors will give the development definition and legibility within the wider environs.</p>  |
|  | Have a positive impact on the local community and environment and contribute to ‘healthy placemaking’.  | <p>Block A acts as a building announcing both the development and the urban environs of Dublin City as commuters enter from the north of the city. Blocks A &amp; B give a strong urban frontage to Swords Road streetscape which both compliments and contrasts with the scale of existing development in the immediate environs. Similarly, Blocks A, D and E front onto Santry Avenue to the north creating a new, contemporary streetscape here too. Combined, the proposed frontages onto both Swords Road and Santry Avenue will be a welcome improvement in providing animation along both streets.</p> <p>The varying heights of the proposed buildings break up the mass and volume of the scheme, with only one tall building of 13 storeys proposed, which will act as a landmark to the prominent corner at the junction of Swords Road and Santry Avenue. The proposed height of 7 storeys at the southern end of the scheme, marries in with the adjoining Santry Place, currently under construction, but also presents an appropriate urban street edge onto Swords Road. The introduction of 8 storey buildings fronting onto Santry Avenue sit side by side of the tallest building thus creating a variance and natural transition between 7 and 13 storeys.</p> <p>The punctuation in the site layout between buildings allows for light penetration into the site but also replicates the positioning of the buildings to the south in Santry Place. The proposed site layout plan provides for connectivity and permeability into Santry</p> |



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|  |   | <p>Place and for urban open spaces to be created. The overall design proposed allows for this site to be developed as a landmark setting for Santry thus creating a sense of place in itself.</p> <p>The proposed development will result in the redevelopment and regeneration of a large brownfield, urban site, thereby enhancing the public realm and the healthy placemaking through the creation of a more attractive and desirable environment. Open spaces and permeable links are proposed and will provide areas within which the public and community can play, socialise and exercise. Additionally, the provision of open spaces, retail units, medical suite / GP practice and community/arts/cultural spaces 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.</p> |
|  | <p><b>Create a distinctive design and add to and enhance the quality design of the area</b></p>   | <p>The design rationale is detailed in the submitted Architectural Design Statement prepared by Davey+Smith Architects. The development will significantly improve the aesthetic of the subject site, as its current closed off and industrial condition is oppressive and encloses the site from the public. The proposed permeable links and open spaces will enhance the public realm and will enhance the quality design of the area.</p> <p>The carefully designed, shaped and modulated development creates an attractive proposition, which will enhance the streetscape, improving the relationship of the site with the surrounding area and will allow the residents and wider community to integrate.</p>   |
|  | <p><b>Be appropriately located in highly accessible places of greater activity and land use intensity.</b></p>  | <p>The subject site is adjacent to a QBC and has been acknowledged as being a site that is on a Public Transport Corridor, therefore the proposed development 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><b>Have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area</b></p> | <p>There is variation in height, scale and form across the proposed buildings. The approach has sought to respect the surrounding properties, by modulating heights throughout the site and providing adequate separation distances from neighbouring properties.</p> <p>The proposed scheme is presented in various forms and heights across the site, transitioning from the lower heights along more sensitive boundaries to the highest form which is positioned at the most prominent position on the site, thus creating a landmark building at this important node into the city.</p>   |



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|   |   | Overall, the proposed building heights will avoid any abrupt transitions in scale and height from neighbouring development, therefore the positioning of the higher building forms has been subject to detailed consideration to ensure that the scheme can be assimilated into the receiving environment.   |
|   | <b>Not be monolithic and should have a well considered design response that avoids long slab blocks</b> | <p>The proposed development has been designed to ensure interesting and lively facades which reduce the perceived mass and scale of the blocks. The proposed heights vary across the site and the orientation of the blocks ensure maximum daylight/sunlight allocation, whilst also protecting the existing amenities of neighbouring properties, all of which demonstrates that the blocks have been broken down to ensure that the scheme will not represent a monolithic form. The material palette has comprehensively considered the surrounding neighbourhood.</p> <p>The high-quality open spaces and permeable links provide visual relief throughout the scheme.</p> <p>An interesting feature of the scheme is the views provided through the site from outside through the new entrance points, particularly the north south axis of open spaces that will connect into the open spaces in Santry Place to the south whilst also affording views northwards to Santry Demesne.</p>   |
|   | <b>Ensure that set back floors are appropriately scaled and designed</b>                                | <p>The submitted Architectural Design Statement prepared by Davey+Smith Architects sets out the rationale for the design approach and how conscious efforts have been made to provide architecturally interesting forms and spaces, whilst also addressing the comments/feedback received from the Planning Authority on the subject site. It is clear that a significant effort has been made to provide well considered and interesting building forms which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area.</p> <p>The setting back of upper levels is proposed as a means to gradually increase heights, whilst respecting the surrounding properties, existing and permitted. The development ranges from 7 no. to 13 no. storeys, with the highest form positioned at the most prominent location of the site, at the junction of Swords Road and Santry Avenue, thus following principles of good urban design, and creating a landmark building at this location.</p> |
| <b>2. To provide appropriate legibility</b> | <b>Make a positive contribution to legibility in an area in a cohesive manner.</b>                      | In its existing state, the site is currently in private use and generally inaccessible to the wider community. The proposed development will open up the site to pedestrians and cyclists with permeability /  |

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|  |   | accessibility provided from Swords Road, and Santry Avenue.  |
|  | <b>Reflect and reinforce the role and function of streets and places and enhance permeability</b> | <p>The site layout plan has been developed in a manner that provides for pedestrian priority throughout. The neighbouring lands bounding the southern boundary of the site are currently being developed as part of the permitted mixed use scheme known as Santry Place (Ref.s 2713/17, 2737/19 &amp; 4549/22). The site layout plan provides for direct connectivity and permeability into Santry Place. The proposed scheme has been designed to allow for it to assimilate with Santry Place to the south, with a view to developing this area of Santry as a landmark setting, creating a sense of place.</p> <p>The site is to be accessed via Santry Avenue and Swords Road which allows for direct accessibility to Santry Park and proposed retail / non-residential uses.</p> <p>The proposed scheme will provide footpaths facing onto both Santry Avenue and Swords Road which will enable the flow of footfall to safely visit the proposed community/arts/cultural uses, retail units and GP practice unit.</p> <p>The layout of the blocks ensure that proposed public and communal open spaces are integrated and overlooked by pedestrian and cyclists as they move through the site.</p> <p>The proposed development will redefine the building line and streetscape at this prominent urban location.</p> <p>The improvements to permeability and safety for pedestrians and cyclists, is also a significant planning gain.</p> |
| <b>3. To provide appropriate continuity and enclosure of streets and spaces.</b> | <b>Enhance the urban design context for public spaces and key thoroughfares</b>                   | <p>The development proposal provides for significant improvements to the public realm and pedestrian accessibility to the site, therefore creating a people friendly environment of streets and spaces.</p> <p>Proposed routes through the site follow the principles of DMURS ensuring that traffic speeds are minimised and that the pedestrian is favoured. The priority for access into and through the site and onwards to adjoining lands is afforded to pedestrians and cyclists.</p> <p>The provision of public open space will be a significant benefit to the local community and will be useable and inviting as people traverse the site from Santry Avenue and Swords Road into the scheme and onwards to Santry Place. As one travels north from Santry Place through the proposed development it provides direct connectivity to Santry Demesne to the north, on the opposite side of Santry Avenue.</p>  |



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|  |   | <p>The areas of public and communal open spaces are centrally located in easy walking distance of all dwellings. The open space incorporates a playground and is overlooked by dwellings on all sides for active supervision.</p> <p>A mixture of shared surfaces and limited surface parking will also aid the creation of a pedestrian friendly environment.</p> <p>The development also provides for high quality ground floor active uses which will invite and attract people to the development thereby creating attractive and friendly spaces and provide activity throughout the day.</p> <p>The tallest element of the proposed development is 13 storeys, however the modulation and variation in building heights is such that it ranges from 7 to 8 up to 13 storeys.</p> <p>The small size of the subject site (c.1.5Ha) as well as its configuration provides for the creation of a compact urban form. The layout of the buildings assists with breaking down the massing of the development which ensures that the development will not be excessive or overbearing.</p> |
|  | <b>Provide appropriate level of enclosure to streets and spaces</b>                 | <p>Throughout the development, the heights vary either in response to higher adjacent context or to provide accent and variation within the scheme, thus enhancing legibility, wayfinding, and connectivity as one traverses the site. The width of central access routes through the site are generous with separation widths between the proposed blocks ranging from c. 18m – 22m – 24m – 26m.</p> <p>The disposition of the blocks is broken up by public and communal open spaces with the north/south axis being the optimum layout in terms of the most preferable orientation for apartment blocks, public open spaces and communal spaces. This allows high levels of sunlight and daylight for all aspects of the development. Furthermore, the proposed frontages onto Swords Road and Santry Avenue are essential to enliven both streets with activity.</p> <p>The introduction of an internal pedestrian street allows a spine of activity through the site and represents the ambition to create a high-quality urban development with a sense of place.</p>               |
|  | <b>Not produce canyons of excessive scale and overbearing of streets and spaces</b> | <p>The proposed buildings address both the external streets (Swords Road &amp; Santry Avenue) as well as the internal public and communal open spaces, with the buildings having varying heights thus lessening any perceived impacts of scale, mass and bulk on these spaces and streets, given the small infill nature of the site. The height and massing of buildings has been carefully considered to ensure an appropriate human scale while creating a degree of enclosure to the internal public realm.</p>   |



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|   | <p><b>Generally, be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3.</b></p>                                     | <p>This results in the perception of height to assimilate with the surrounding development, with generous internal separation between buildings and a general strategy to gradually increase height from seven up to eight up to thirteen storeys. The proposed building heights are considered to be in keeping with the neighbouring scale of development to the immediate south at Santry Place. All this combines to create a development that is within a human scale.</p> <p>These building elements face large open spaces which provide an appropriate street width to building height ratio, as follows:</p> <p>Swords Road: 1 : 1.44<br/> Santry Avenue: 1 : 1.2<br/> Corner of Swords Rd &amp; Santry Ave: 1 : 2.4<br/> Street along eastern boundary = 1 : 1.22<br/> Street along southern boundary = 1 : 1</p>   |
|   | <p><b>Provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.</b></p> | <p>Ample passive surveillance is provided throughout the development. All open spaces and streets are overlooked by apartments or the community/cultural space.</p> <p>All entrances will be sufficiently overlooked and new streets, spaces and connections will create visual interest for the surrounding streetscape and provide permeable connections for the residents and wider public. The non-residential ground floor uses will also generate additional animation along the street level with the layout broken up by open spaces which act as attractive meeting points for the local community and residents and thus the development will promote activity throughout.</p>  |
| <p><b>4. To provide well connected, high quality and active public and communal spaces.</b></p> | <p><b>Integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport.</b></p>   | <p>The non-residential ground floor uses fronting onto both Swords Road and Santry Avenue ensure an appropriate level of activity is provided at street level thus creating safe, secure and enjoyable public areas.</p> <p>The location of the public open space provision for the development has been carefully selected in terms of orientation for sunlight, to connect physically and visually with the open spaces in Santry Place to the south and also create a visual connection with Santry Demesne to the north. The open spaces are in easy walking distance of all dwellings and passively supervised. The open space incorporates children's play, while communal open spaces for the development are also centrally located so as to be in easy walking distance of all dwellings and passively supervised. The layout of the blocks allows for light penetration into these areas of open space for maximum amenity.</p> <p>Landscaping and boundary treatments will ensure that communal and public open spaces are clearly</p> |



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|  |  | defined from each other, ensuring a safe and enjoyable environment for the future residents.   |
|  | <b>Be appropriately scaled and distanced to provide appropriate enclosure / exposure to public and communal spaces, particularly to residential courtyards.</b>  | <p>A balance was sought by the Design Team between securing open and accessible, but also attractive and safe open spaces. The public and communal open spaces will be overlooked by the proposed blocks and the locations of these spaces are appropriately enclosed.</p> <p>The location and layout of the open spaces makes them accessible and visible, thus inviting users into them thus visually opening the site up to the public and enhancing legibility in the area.</p>  |
|  | <b>Ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities.</b> | <p>CS Consulting carried out the submitted daylight and sunlight assessment, along with an accompanying shadow study for the proposed development – please refer to same for full details.</p> <p>The submitted assessment tested the development's performance for sunlight on the ground SOG (shadow) gardens and open spaces, which tests for the availability of sunlight in amenity areas, and found that most new provided communal and public amenity spaces pass the BRE requirement. There are compensatory factors relating to those that do not. The tested spaces generally comply with the requirements of the BRE guidelines.</p> <p>Therefore, it is clear that the proposed development will provide high-quality public and communal open spaces.</p> |
|  | <b>Ensure the use of the perimeter block is not compromised and that it [is]<sup>1</sup> utilised as an important typology that can include courtyards for residential development.</b>  | The size, shape and orientation of the site, as well as the need to open up the site to accessibility and permeability precludes the inclusion of perimeter blocks on the site.  |
|  | <b>Ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated.</b>  | <p>B-Fluid has prepared the submitted Wind Microclimate Modelling which has been carried out to identify the possible wind patterns around the area proposed, under mean and peak wind conditions typically occurring in Dublin, and also to assess impacts of the wind on pedestrian levels of comfort/distress.</p> <p>The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for "Frail persons or cyclists" and for members of the "General Public" in the surrounding of the development.</p>   |

<sup>1</sup> The word [is] is missing from the CDP.

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|  |   | <p>Therefore, the CFD study carried out has shown that under the assumed wind conditions typically occurring within Dublin for the past 15 years:</p> <ul style="list-style-type: none"> <li>▪ The development is designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian).</li> <li>▪ The development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads.</li> </ul> <p>Please refer to the submitted Wind Microclimate Modelling study for full details.</p>   |
|  | <b>Provide for people friendly streets and spaces</b>                     | <p>The proposed site layout plan remains relatively the same as that previously proposed, but that the heights of the buildings have been reduced. Please refer to the submitted Wind Microclimate Modelling study, prepared by B-Fluid, which states:</p> <ul style="list-style-type: none"> <li>▪ The assessment of the proposed scenario has shown that no area is unsafe, and no conditions of distress are created by the proposed development.</li> <li>▪ All the roads proposed can be used for their intended scope.</li> <li>▪ All terraces are suitable for sitting/standing. It is important to note that fluctuations in velocity on rooftop terraces may lead to door slamming issues. Therefore, it is recommended to consider such conditions in terrace design. Possible means of reducing the risk of door slamming include installing door actuators, using automatic or sliding doors, etc.</li> <li>▪ The wind microclimate of the proposed development is comfortable and usable for pedestrians.</li> <li>▪ The development is designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian).</li> </ul> |
| <b>5. To provide high quality, attractive and useable private spaces</b> | <b>Not compromise the provision of high quality private outdoor space</b> | <p>Each dwelling has access to usable private outdoor space, in the form of terraces at ground floor level and balconies on all upper floors, which meets and/or exceeds the minimum standards for residential dwellings detailed in the Apartment Guidelines, and as confirmed in the submitted HQA.</p>  |

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|  | <b>Ensure that private space is usable, safe, accessible and inviting</b>  | <p>Terraces that interface with the public/communal amenity areas have adequate buffers to protect privacy and enhance residential amenity.</p> <p>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.</p>  |
|  | <b>Ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards.</b>   | <p>This aspect of the design has been considered and full details of the assessment are included in CS Consulting's <i>Daylight and Sunlight Assessment</i>, which demonstrates significant compliance with the 3<sup>rd</sup> Edition of BRE 209.</p> <p>As outlined above, a Wind Microclimate Modelling study is submitted as a separate document as part of this LRD planning application – please refer to same.</p>  |
|  | <b>Assess the microclimatic effects to mitigate and avoid negative impacts.</b>  | <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>  |
|  | <b>Retain reasonable levels of overlooking and privacy in residential and mixed use development.</b>   | <p>Ample separation distances and setbacks from surrounding properties have been proposed as discussed, thereby ensuring that existing residences are not overlooked.</p>  |
| <b>6. To promote mix of use and diversity of activities.</b> | <b>Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure</b> | <p>In accordance with this criterion, whilst residential is the primary use, mixed uses including retail, medical/GP practice and community/arts/cultural space are also proposed. Therefore, the proposed development will promote the delivery of mixed and neighbourhood uses. The proposed non-residential elements of the development are located at ground floor level and front onto Swords Road and Santry Avenue, thus creating animated street frontages.</p>  |
|  | <b>Contribute positively to the formation of a 'sustainable urban neighbourhood'.</b>  | <p>Several factors illustrate the proposed development's contribution to the formation of a 'sustainable urban neighbourhood':</p> <ul style="list-style-type: none"> <li><b>a)</b> A broadening of the housing stock will enhance the demographic and socio-economic composition of the local area.</li> <li><b>b)</b> The mix of uses will meet the needs of future residents, as well as existing neighbouring residents, and will also provide opportunities for employment.</li> <li><b>c)</b> Additional local population will support the attainment of critical mass required to sustain local services and businesses.</li> </ul> |

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|   |   | <p><b>d)</b> 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.</p> <p><b>e)</b> 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><b>f)</b> The provision of public open spaces and an enhancement of the built-form and public realm in this area are much-needed given the closed off/gated and underutilised nature of the existing site and its failure to provide an animated street frontage, notable aesthetic, social and economic benefits.</p>                           |
|   | <p><b>Include a mix of building and dwelling typologies in the neighbourhood.</b></p>   | <p>The development includes a wide mix of unit types / sizes including 1, 2 and 3 bed dwellings. A wide variety of tenures and housing formats are provided to suit a range of lifestyles and demographics, all of which is detailed in Section 6.1 of the submitted Planning Statement. The mix of dwelling types proposed will enhance the existing housing stock in the neighbourhood.</p> <p>The mix of apartment types (1-bed, 2-bed (3-person), 2-bed (4-person) &amp; 3 bed (5-person)) accord with SPPR 1 of the Apartment Guidelines. Furthermore, they will add to the stock of housing in the area and broaden its mix given that traditionally Santry was predominantly comprised of houses, with newer apartment developments having been recently delivered in the vicinity.</p> |
|   | <p><b>Provide for residential development, with a range of housing typologies suited to different stages of the life cycle</b></p>  | <p>The units are designed to be adaptable and flexible in order to suit different stages of the life cycle. In this regard, out of the 321 no. units proposed in total, 212 no. exceed the minimum floor area requirements by over 10%, which equates to c.66% of the total. Of the aforementioned 212 no. units, 81 no. are capable of being adapted as universal design units (which also equates to c.25% of the total units provided).</p>   |
| <p><b>7. To ensure high quality and environmentally sustainable buildings</b></p> | <p><b>Be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light</b></p> | <p>The modulation of height, which varies from 7 up to 13 storeys, in a stepped arrangement, ensures that the proposed development is not monolithic in its built-form, with its scale and massing distributed appropriately.</p> <p>As per the submitted results of CS Consulting's Daylight and Sunlight Assessment Report, 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 Daylight and Sunlight Assessment Report to ensure an attractive living environment for future residents which has a limited impact on the amenity of surrounding properties.</p>  |





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|  |   | <p>The variation in height and massing allows for natural ventilation to be achieved, with no long, unbroken sections of building proposed. The height of the subject scheme modulates throughout the site depending on the block location.</p> <p>Privacy is secured by way of separation distances, planted screening/buffers, and offset windows and balconies.</p>  |
|  | <p><b>Not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain</b></p>                                       | <p>CS Consulting's Daylight and Sunlight Assessment Report 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. Large setbacks have been provided from surrounding properties.</p>  |
|  | <p><b>Ensure a degree of physical building adaptability as well as internal flexibility in design and layout.</b></p>   | <p>The design of the proposed development considered adaptability and the prospect of different uses in the future. The scheme provides 212 no. units (66%) out of the total of 321 no. are over 10% minimum areas. 81 no. of these units are capable of being adapted as universal design units.</p> <p>The community/arts/cultural spaces are flexible internally and layouts/uses will be agreed with Dublin City council post-planning.</p> |
|  | <p><b>Ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive.</b></p>               | <p>Davey + Smith Architects have sought to minimise rooftop plant and infrastructure. Furthermore, the submitted EIAR includes a Landscape Visual Impact Assessment of the proposed development – please refer to same for details.</p>   |
|  | <p><b>Maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage.</b></p> | <p>A total of 153 no. of the 321 no. proposed units are dual aspect in their design, which equates to 48% of the overall units, thus exceeding the requirement in this location, with a further 6 no. apartments being triple aspect, so a total of 159 no. units are dual/triple aspect (i.e. 49.5%).</p>  |
|  | <p><b>Be constructed of the highest quality materials and robust construction methodologies.</b></p>  | <p>This design principle has been applied in the proposed development. Brick, along with metal cladding, rather than render, are the predominant materials used, which are more robust and require less maintenance and upkeep.</p>   |
|  | <p><b>Incorporate appropriate sustainable technologies, be energy efficient and climate resilient.</b></p>  | <p>The proposed development has been designed to be fully compliant with existing Building Regulations and this LRD planning application is accompanied by an Energy Statement which provides details of the intended sustainable technologies, energy efficiencies and climate resilience – please refer to same for details.</p>  |

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|  | <p><b>Apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16)</b></p> | <p>Quantitative approaches to the assessment of sunlight and daylight are in accordance with the requirements set out in Appendix 16. The submitted Daylight and Sunlight Assessment Report by CS Consulting should be referred to for a comprehensive assessment. We note that page 30 of the submitted Daylight and Sunlight Assessment refers to the compensatory design measures for the scheme in relation to the units that could be considered to be underperforming. These measures include large apartment sizes and large private balconies etc.</p>  |
|  | <p><b>Incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place (See Appendix 13).</b></p>   | <p>Surface water proposals are set out in the submitted Engineering Services Report and within the suite of engineering drawings prepared by DBFL Consulting Engineers. Included in Section 3 of the submitted Engineering Services Report are details on the site's compliance with surface water policy. The surface water strategy includes SuDS features such as green / blue roofs, permeable paving, etc. and landscaped areas for example.</p>   |
|  | <p><b>Include a flood risk assessment – see SFRA Volume 7.</b></p>  | <p>DBFL Consulting Engineers have also prepared the enclosed Site-Specific flood Risk Assessment under separate cover – please refer to same.</p>   |
| <p><b>8. To secure sustainable density, intensity at locations of high accessibility</b></p> | <p><b>Enhanced density and scale should:</b></p> <ul style="list-style-type: none"> <li>▪ <b>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,</b></li> </ul>   | <p>The development provides a gross and net density of c. 214 no. dwellings per hectare. The proposed density is therefore considered to be making full, efficient, use of the available lands. The proposed density and building heights capture the opportunity to develop the site appropriately, with the site's location adjacent to public transport options and existing surrounding environs ensuring that the site is capable of supporting such height and density without any detriment to existing residential amenity.</p> <p>The subject site is well served in terms of public transport provision. There is a Quality Bus Corridor (QBC) running along Swords Road utilised by Dublin Bus routes 16, 33, 41, 41b &amp; 41c. The aforementioned bus routes travel along the Swords Road corridor which lies to the east of the subject site. In addition, Dublin Bus Route 27b operates along the R132 Road corridor (to the north east of the subject site) providing links to/from Dublin City Centre and Harristown. The Go-Ahead Ireland bus Route 17a operates along Santry Avenue providing links to/from Blanchardstown and Kilbarrack. The aforementioned bus services are all within walking distance of the subject site, i.e. between 5m-500m. These bus services operate on a daily basis and offer relatively frequent schedules as set out in the submitted Traffic and Transport Assessment (TTA). Bus services will be further enhanced and improved as BusConnects is rolled out to a greater extent in the coming years. The development proposes bicycle parking in excess of requirements which will promote sustainable development. A study on the</p> |

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|   | <ul style="list-style-type: none"> <li>look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.</li> </ul>   | <p>capacity of public transport in the area has been prepared by DBFL Consulting Engineers and is enclosed separately.</p> <p>A site coverage of c.33.5% is proposed which demonstrates the concerted efforts made by the Design Team to ensure that the development maximises opportunities to provide meaningful and accessible areas of open space and generous separation distances from neighbouring developments. This has been optimised, ensuring that the 10% public open space requirement is met, access to the basement car parking is safely designed and located, set down spaces are included, and the scheme does not result in excessive height in order to achieve appropriate floor area (i.e. plot ratio).</p>   |
| <p>9. To protect historic environments from insensitive development</p> | <p>Enhanced density and scale should:</p> <ul style="list-style-type: none"> <li>not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below.</li> </ul>  | <p>Dermot Nolan, Conservation Architect has prepared the submitted Architectural Heritage Impact Assessment (AHIA) of the subject site in light of the industrial building on site and due to Santry's long history as a location for commercial and industrial purposes in Dublin – please refer to same for full details.</p>  |
|   | <ul style="list-style-type: none"> <li>be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed,</li> </ul> <p>and</p> <ul style="list-style-type: none"> <li>assess potential impacts on keys views and vistas related to the historic environment.</li> </ul> | <p>As part of the submitted EIAR, chapter 15 The Landscape provides for a full Landscape Visual Impact Assessment (LVIA) of the proposed development.</p> <p>We note from the assessment of the EIAR submitted with SHD Ref. ABP-310910-21, that the An Bord Pleanála Inspector noted the following in relation to the LVIA: <i>"The EIAR describes the sensitivity of the site and receiving environment as medium. There are no protected views or Architectural Conservation Areas (ACAs) relevant to the subject site"</i>. He also stated: <i>"I note the changing urban context in this area and do not regard the assessment of landscape and visual impacts as unreasonable. I note that the PA Conservation Officer has not raised any objections to the development in respect of impacts on St. Pappan's Church. The impact on views from Santry Demesne is noted, however, this is not considered to have a significant negative impact, and is not out of character with other existing views on the fringes of, this regional urban park, and reflects the change in the surrounding context"</i>.</p> <p>He concluded: <i>"I have considered all of the application documentation and submissions received, and I am satisfied that impacts that are predicted to arise in relation to Landscape would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am</i></p> |

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|  |  | <p><i>satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Landscape”.</i></p> <p>Given the proposed reduction in building heights from those previously proposed, we consider that there will be no negative visual impacts arising from the current proposal.</p>   |
| <p><b>10. To ensure appropriate management and maintenance</b></p> | <p><b>Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.</b></p> | <p>As part of this LRD planning application, the following reports are submitted in support of the proposed development:</p> <ul style="list-style-type: none"> <li>• <i>Operational Waste Management Plan</i></li> <li>• <i>Property Management Strategy Report</i></li> <li>• <i>Mobility Management Plan</i></li> <li>• <i>Building Lifecycle Report</i></li> <li>• <i>Landscape Planning Report</i></li> </ul> <p>Upon receipt of a future grant of permission an Owners Management Company (OMC) will be established to ensure proper and sustainable maintenance of the development throughout the operational phase.</p> |

Taking into account of the details contained in the foregoing Table 8, it is considered that, in compliance with the guidelines of Appendix 3 of Volume 2 of the existing CDP, the development proposal and its proposed building heights can be absorbed at the subject site.

Having regard to the locational context of the subject site, the national and local planning policy regarding building height, and the planning history attached to the site, an opportunity has been taken to explore the potential for increased heights. The height of the proposed development is modulated throughout the site, principally ranging from c. 22.9 metres to a maximum height of 44.2 metres, only on Block A. It is put forward that the subject site, as an acknowledged public transport corridor has the capacity to absorb increased height as the site has significant frontage onto both Santry Avenue and Swords Road, with the latter being positioned on a main arterial route / public transport corridor into the city centre. The highest element of the scheme (Block A) is located at the junction of Swords Road and Santry Avenue, at an important node as one enters the city, thus acting as a landmark building at this prominent location. It is considered that appropriate heights have been provided responding to the Building Height Guidelines as demonstrated in this Statement of Consistency, and as reaffirmed in the submitted Architectural Design Statement prepared by Davey+Smith Architects.

### 7.1.8 Public Open Space

Public open space for the proposed development is provided for in linear form, centrally located, between Blocks C-D and E-F. The proposed public open space provision equates to c. 1,791sq.m representing c. 12% of the site area.

The existing CDP states, in Section 15.8.6, that *“Public open space is an external landscaped open space which makes a contribution to the public domain and is accessible to the public and local community for the purposes of active and passive recreation, including relaxation and children’s play. Public open space also provides for visual breaks between and within residential areas and facilitates biodiversity and the maintenance of wildlife habitats. All residential development is required to provide for public open space”.*



Table 15-4 of the CDP requires that Z3 zoned lands have a minimum 10% public open space requirement. The proposed development caters for c. 12% of the subject site to be allocated as public open space and is therefore in compliance with the requirements of the CDP.

The proposed public open space has been strategically designed and located to align with the permitted public open space provision within the adjoining Santry Place development to the immediate south, allowing for visual integration between proposed and permitted developments and maximising meaningful, usable space.

We note that Policy GI28 “New Residential Development” of the existing CP states: *“To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes”.*

The CDP also contains policy GI52 which relates to “Children’s Playing facilities in New Residential and Mixed Developments” and states: *“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.”*

Section 15.8.6 of the existing CDP states that *“Public open space is an external landscaped open space which makes a contribution to the public domain and is accessible to the public and local community for the purposes of active and passive recreation, including relaxation and children’s play. Public open space also provides for visual breaks between and within residential areas and facilitates biodiversity and the maintenance of wildlife habitats”.* The CDP also requires *“All residential development is required to provide for public open space”* and that *“The public open space requirement for residential developments shall be 10% of the overall site area as public open space”.*

The CDP also states that Dublin City Council will seek the following *inter alia* in the delivery of public open space:

- *The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.*
- *Open space should be overlooked and designed to ensure passive surveillance is achieved.*
- *The space should be visible from and accessible to the maximum number of users.*
- *Inaccessible or narrow unusable spaces will not be accepted.*
- *The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16.*
- *Permeability and accessibility for all users, particularly disabled persons should be provided.*
- *Cycle and pedestrian friendly routes should be accommodated.*

The proposed areas of public open space measure of total of c. 1,791m<sup>2</sup> which equates to c. 12% of the gross site area and this complies with the provisions set out in the CDP (Table 15-4) that ‘Z3’ lands provide a minimum of 10% of public open space.

The submitted Landscape Masterplan and supporting landscaping proposals demonstrate that a high quality of landscaping has been applied to the proposed development which provide for a variety of recreational activities including seating, play areas, outdoor table tennis, areas for meeting and socialising etc.

The development proposal complies with the policies and objectives of the existing CDP in this regard.

In addition to the above detailed public open space provision, the proposed development will also cater for communal open space in the form of roof gardens and at surface level.



### 7.1.9 Communal Open Space

In addition to the above detailed public open space provision, the proposed development also caters for communal open space as follows:

- At ground floor, between Blocks A-B & C-D - c. 1,316sq.m:
- At ground floor, between Blocks E- F, & G - c. 556sq.m:
- In the form of roof gardens located on:
  - Block A (c.154.7 sq.m)
  - Block C (c. 418.6 sq.m)
  - Block F (c. 436.1 sq.m)
  - on the proposed residential amenity use unit (c. 104.6 sq.m).

Therefore, in totality, the proposed communal open space provision for the development equates to c. 2,986.1m<sup>2</sup>.

In total, 2,986.1m<sup>2</sup> of communal open space is provided to cater for 321 no. apartments. In accordance with the standards of the Apartment Guidelines, approx. 2,071m<sup>2</sup> of communal open space is required as per Table 9 below:

| Unit Type        | No. of Units | Individual Communal Open Space required m <sup>2</sup> | Total Communal Open Space Required |
|------------------|--------------|--|------------------------------------|
| 1 bed            | 104          | 5  | 520                                |
| 2 bed / 3 person | 6            | 6  | 36                                 |
| 2 bed / 4 person | 192          | 7  | 1,344                              |
| 3 bed            | 19           | 9  | 171                                |
| <b>Total</b>     | <b>321</b>   |  | <b>2,071m<sup>2</sup></b>          |

**Table 9 – Quantum of Communal Open Space Required**

Section 15.9.8 “Communal Amenity Space” of the CDP states that *“All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development”*.

The CDP also asserts that *“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. The communal amenity area should be functional and usable to a range of activities including, children’s play, passive recreation and leisurely activities such as games and exercise”*. The enclosed site layout plan (drawing no. P03) identifies the location of the various communal opens on the site and Dermot Foley Landscape Architects have prepared the submitted landscape design proposals for same, catering for recreation and amenity for future residents.

The CDP states that *“Development proposals shall demonstrate that the communal open space:*

- i. Complies with the minimum standards based on each individual unit.*
- ii. 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.*
- iii. Is secure for residents and benefits from passive surveillance.*
- iv. Considers the needs of children in particular in terms of safety and supervision and is fully accessible to all.*

- v. *Achieves good sunlight penetration*
- vi. *Has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections.*

The proposed development complies with the above criteria as follows:

- i. Table 8 demonstrates that sufficient communal open space is afforded to the scheme.
- ii. A mix of hard and soft landscaping is proposed for the communal open spaces as per the submitted landscape drawings prepared by Dermot Foley Landscape Architects.
- iii. The communal open spaces are accessible, secure and passively overlooked by adjoining dwellings.
- iv. The communal open spaces are accessible for those with mobility needs / be Part M compliant.
- v. The communal open spaces have been assessed in terms of daylight/sunlight accessibility as discussed in the submitted Daylight / Sunlight Assessment by CS Consulting – please refer to same, which asserts that the proposed development will provide high-quality public and communal open spaces.
- vi. This LRD planning application is accompanied by a Property Management Strategy which takes into account the future operational stage of the proposed development.

Section 15.9.9 “Roof Terraces” of the CDP states that *“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 Development Standards 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”* [our emphasis added]. The proposed development provides c.1,872m<sup>2</sup> of communal open space at surface level, which represents c.12% of the application site area and c.63% of the overall communal open space provision, and also represents 90% of the communal open space requirements as per the Apartment Guidelines. In addition, 1,114.1m<sup>2</sup> of communal space is provided for at upper levels of Blocks A, C and F, and on the roof terrace of the residential amenity building, thus ensuring that high quality communal open space is provided for future tenants. It is evident that the proposed communal open space significantly exceeds the minimum communal amenity space standards as required.

It is noted that the CDP states that *“...roof terraces will not be permitted as the primary form of communal amenity spaces”*, however, the CDP also states that *“roof terraces may be provided in certain circumstances”*. The Design Team wish to assert that the proposed communal terraces at the upper level have been designed to be of a high quality and given the limited size of the application site, it is considered that the proposed communal open spaces are appropriate for the subject site. The proposed development has been assessed in terms of daylight/sunlight in amenity spaces and in terms of microclimate impacts, all of which confirm that the proposed development is acceptable.

It is obvious from the submitted proposals that the overall communal open space provision complies with and exceeds the minimum standards for same and is provided for as a mix of ground floor communal spaces and roof terraces.

We note from the previous SHD application (Ref. ABP-310910-21), that the An Bord Pleanála Inspector stated the following in relation to the communal open space provision: *“Communal open space is provided between blocks A/B and C/D, and between E/F and G and at roof level. The design and layout of provision is regarded as satisfactory”*. He went on to assert that *“In addition to such external communal open space, the development provides a residential amenity facility of 187sq.m., between Block A and D, fronting onto Santry Avenue. This is a positive aspect of the development and supplements communal open space provision. There is some variation in levels across the site and while commercial / public access units are generally at or close to grade, the development incorporates the difference in levels to provide some landscaped separation between Santry Avenue and this residential amenity unit, which is considered to be a successful design approach”*. Given the similarities



between that proposal and the current proposal, it is considered that the provision, design and communal open space is satisfactory.

#### **7.1.10 Private Open Space Provision**

Private open space is afforded to each of the proposed dwellings, in the form of terraces for ground floor units and balconies at all upper levels. All private open spaces are provided for in compliance with the standards of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023 and are scheduled on the submitted HQA – please refer to same.

#### **7.1.11 Non-Residential Uses**

The proposed development also provides for 3 no. retail units, a medical suite / GP Practice unit, c. 1,460m<sup>2</sup> of community/arts & culture space, all located on the ground floor of Blocks A, B, C, D, E and F, and a dedicated 1 storey residential amenity use unit located between Blocks A and D. The proposed non-residential uses face onto Santry Avenue and Swords Road to cater for active frontage at an important corner location, with the proposed community/arts & culture space also extending into the site (Blocks C, D, E and F).

The following is the proposed mix of non-residential uses:

##### **Retail:**

- Block A – 2 no. units, 132.4m<sup>2</sup> & 171.8m<sup>2</sup> respectively = 304.2m<sup>2</sup> total
- Block B – 1 no. unit, 163.9m<sup>2</sup>
- Total retail / commercial = 468.1m<sup>2</sup>

##### **Medical suite / GP Practice:**

- Block B - medical suite / GP Practice unit (130.4m<sup>2</sup>)

##### **Community/arts & culture space:**

- C.1,460m<sup>2</sup> laid out on ground floors of Blocks C, D, E & F.
- The total floor area of proposed non-residential uses = 2,058.5m<sup>2</sup>.

In addition:

##### **Residential amenity unit:**

- a 1 storey residential amenity unit (c. 166.1m<sup>2</sup>) located between Blocks A & D.

##### **Retail Use**

The development includes 3 no. retail uses located on the ground floors of Blocks A and B. These retail units have been strategically located, fronting on to both Santry Avenue and Swords Road, to cater for active frontage and bring a new vibrancy to a highly visible corner location in this urban community. The proposed retail units are also put forward in recognition of the Z3 (Neighbourhood Centres) zoning attached to the site. In accordance with the vision for Z3 lands, these uses will create a new focal point in the neighbourhood by providing a range of convenience type services to both the existing and future local population.



It is also considered that these retail units compliment larger existing retail facilities in the area, particularly the Aldi supermarket to the west and the Omni Shopping Centre to the south.

It is submitted that the provision of 3 no. retail units at ground floor level, forming a strong ground floor frontage, directly addressing the adjoining streetscapes, and adjacent to an existing large urban park (Santry Demesne), will provide for an attractive new range of facilities to serve local needs in compliance with the zoning objective attached to the site.

### **Medical Suite / GP practice use**

On the ground floor of Block B, it is proposed to accommodate a medical suite / GP use in Unit E. Under the Z3 “Neighbourhood Centres” land use zoning objective attached to the site, “*medical and related consultants*” is a permissible use in accordance with the CDP.

We note from the assessment of the previous SHD application (Ref. ABP-310910-21) that the Planning Authority stated that in terms of the ground floor uses that a condition should require retail / medical use of such units. The Planning Authority also noted that many observations referred to the lack of GP services in the area. We also note that in their recommendation to grant permission, the Planning Authority suggested that commercial unit E shall be provided as a medical suite/GP practice unit.

In addition, in his assessment of the application, the An Bord Pleanála Inspector concurred with the Planning Authority and stated the following: *“In respect of the commercial units proposed on the site, I note that condition no. 4 recommended by the Chief Executive identifies uses for the commercial units, including the use of Unit E as a medical suite / GP practice. I consider this condition to be reasonable and appropriate having regard to the objectives for the Z3 zone. Such condition would also satisfactorily address observer’s concerns regarding the lack of healthcare facilities in the area. In the event that the prescribed uses proved unviable, it would be open to the landowner to demonstrate same and seek a change of use at a later date. I consider that the condition should allow some flexibility with regard to which specific unit is used for medical / GP surgery use”.*

Based upon all of the foregoing, the current proposal provides for a medical suite / GP practice unit on the ground floor of Block B, occupying a space of c. 130sq.m

### **Community/Arts & Culture Use**

In accordance with the Z3 “Neighbourhood Centres” zoning attached to the site, the proposed development provides for community/arts & culture uses, totalling 1,460sq.m, which is spread across the ground floors of Blocks C-D and E-F. The submitted ground floor plan illustrates that a variety of community/arts & culture uses can be accommodated within the proposed floor area dedicated to such uses. On the ground floor of Blocks C-D, c.583sq.m of floorspace is proposed, while Blocks E-F cater for an additional c.877sq.m. Prior to the submission of this application for permissions, the Applicant engaged with Dublin City Council and Dublin Arts Office regarding the provision of the required 5% of floorspace to cater for community/arts/cultural uses. In addition, this LRD planning application is accompanied by a Cultural Infrastructure (Impact) Assessment (hereafter “CIA”) which has examined what the demand for such uses is in the local area. The CIA finds that *“the proposed space across 4 blocks (blocks C and D providing c. 583sq.m and blocks E and F providing c. 877.2 sq.m) is sufficient in scale to host multiple cultural (artist workspace, performance, rehearsal, maker or multipurpose space) and community typologies, as well as to accommodate a wide range of artforms and community uses”.* In addition, the CIA has revealed a lack of appropriate cultural infrastructure near the site and asserts that *“a shared community / music and dance or makerspace, alongside provision for artist workspace studios, would deliver a notable cultural /community asset not just to the creative and arts professionals in the area, but to the wider community of Artane-*



*Whitehall. In addition to this, through a co-design model, should areas within the cultural allocation of the site be fitted out to accommodate dance they could also serve the needs of the local sporting community through provision of martial arts, boxing, and/or gymnastics".* Based upon the findings of the CIA, the ground floor space in Blocks C-D and E-F has been designed to accommodate potential uses such as maker space, dance studios, community resource, artists studios.

The total proposed community/arts & culture uses is put forward in compliance with objective CUO25 of the CDP, which requires that for all large scale developments above 10,000sq.m in total area, that a minimum of 5% community, arts and culture spaces including exhibition, performance and artist workspaces predominantly internal floorspace is to be provided. The total floor area of the proposed development is 25,530.1m<sup>2</sup>. 5% of the total proposed floor area equates to c.1,276.5m<sup>2</sup>, therefore the proposed 1,460m<sup>2</sup> exceeds the minimum requirement under objective CUO25 of the CDP.

It is considered that the floor spaces proposed to be dedicated to community/arts & culture uses, dependant on the tenant(s), will provide the opportunity to implement a range of programmes and services to benefit the community and meets the demand for such uses, as identified in the submitted CIA. It is envisaged that the community/arts & culture uses will enable new and established communities in Dublin 9 to engage with each other, fostering a sense of community and increasing the social interaction.

The proposed community/arts & culture spaces fronting onto Santry Avenue in Blocks D and E have been designed as a welcoming space, with large windows maximising light and amenity use. It is considered that these spaces have the potential to cater for a number of functions such as community resource / maker space, and will offer a focal point within the scheme. To the rear of same, as one moves into Blocks C and F, larger spaces are proposed to accommodate further community/arts & culture uses, e.g. artist studios and dance studios, and through a co-design model, should areas within the cultural allocation of the site be fitted out to accommodate dance they could also serve the needs of the local sporting community through provision of martial arts, boxing, and/or gymnastics which provides flexibility and long term sustainability in terms of the viability of the use of these spaces. The frontage of all of these spaces onto either the public realm or open spaces will ensure that there will be a consistent level of activity in this part of the development. It is envisaged that the management of the proposed community/arts & culture spaces will be operated by a specified management company, who may liaise with Dublin City Council and / or Dublin City Council's Arts Office and / or the Dublin City Local Community Development Committee in terms of what services the allocated floorspace caters for. It is considered that upon a grant of permission being issued for the proposed development, that the specific details of quantum and location of such floor space/uses will be agreed with the Planning Authority at compliance stage, post planning.

### **Residential Amenity Use**

In addition to the above commercial / retail and community uses, the proposed development includes for a one storey residential amenity use unit (166.1m<sup>2</sup>) located between Blocks A & D which fronts onto Santry Avenue. It is considered that the proposed residential amenity use unit will be capable of supporting a range of services while also providing for recreation space to future residents of the development, helping to create a sense of community between residents of the proposed apartment blocks. The residential amenity use unit also provides for a focused entrance point to this new development on Santry Avenue, aiding the creation of a sense of place and identity for the development.

The proposed residential amenity use unit has been designed to provide recreation and relaxation amenity spaces to its residents close to home. Communal amenity facilities that can be accommodated in the residential amenity unit will be up to the eventual operator as to the function of the space; however, the design of this unit allows flexibility to facilitate numerous uses. Common amenity uses include:

- |           |                         |
|-----------|-------------------------|
| ▪ Gym     | ▪ Co-Working Desks      |
| ▪ TV Room | ▪ Conference Facilities |





- Cinema Room
- Library Area / Quiet Zone
- Dining / Entertainment Area
- Concierge



Within the stand alone residential amenity unit, flexible residential amenities are catered for, such as a residents lounge for recreation and co-working which could include work booths for individual work or two to four person meetings. The use of the co-working facilities will be managed by the Management Company. Residents can use the space to meet up and socialise or it could be used for many activities including presentations, workshops or classes. The Management Company will be responsible for managing the leasing or booking of these spaces.

The dedicated residential amenity unit fronts onto the new public realm at Santry Avenue, positioned in between the proposed retail unit at ground floor of Block A and the proposed community/arts & culture unit at ground floor of Block D. The location of these units alongside each other and fronting onto the street will create a vibrancy along the new street front and provide residents with essential amenity space. It is considered that in combination these units will create a homely and welcoming atmosphere within the development.

Roof terraces / garden terrace amenity space are provided on the roofs of Blocks A, C, & F and the proposed residential amenity use unit, which will offer recreational meeting areas for residents to socialise and enjoy rooftop views of Dublin City and Santry Demesne park to the north.

#### **7.1.12 Aspect**

Table 9 overleaf out the quantum and percentage of single, dual and triple aspect units in the entire scheme.

We note that under the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023, (section 3.17 of same) it is a policy requirement that apartment schemes “*deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e. on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design. Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective that there shall be a minimum of 50% dual aspect apartments. Ideally, any 3 bedroom apartments should be dual aspect*”.

It is evident from Table 10 overleaf that the proposed development is compliant with SPPR 4 of the Apartment Guidelines with 48% of the proposed dwellings being dual aspect units, with an additional 2% of the units being triple aspect. The submitted HQA also details which units are considered to be dual aspect and which units are considered to be single aspect.



| Block        | No. Single Aspect Units | % Single Aspect Units | No. Dual Aspect Units | % Dual Aspect Units | No. Triple Aspect Units | % Triple Aspect Units | Total No. Units |
|--------------|-------------------------|-----------------------|-----------------------|---------------------|-------------------------|-----------------------|-----------------|
| A            | 13                      | 25%                   | 38                    | 75%                 | 0                       | 0%                    | 51              |
| B            | 20                      | 54%                   | 18                    | 46%                 | 0                       | 0%                    | 38              |
| C            | 33                      | 62%                   | 20                    | 38%                 | 0                       | 0%                    | 53              |
| D            | 23                      | 52%                   | 21                    | 48%                 | 0                       | 0%                    | 44              |
| E            | 28                      | 57%                   | 21                    | 43%                 | 0                       | 0%                    | 49              |
| F            | 32                      | 62%                   | 20                    | 38%                 | 0                       | 0%                    | 52              |
| G            | 13                      | 38%                   | 15                    | 44%                 | 6                       | 18%                   | 34              |
| <b>Total</b> | <b>162</b>              | <b>50%</b>            | <b>153</b>            | <b>48%</b>          | <b>6</b>                | <b>2%</b>             | <b>321</b>      |

**Table 10 - Aspect of Proposed Dwellings**

### 7.1.13 Car Parking

In total, the proposed development caters for 194 no. car parking spaces provided for in the form of basement level parking and surface level parking.

Of the total 194 no. on-site dedicated car parking spaces to be provided, 161 no. spaces will be provided within the basement car parking and 33 no. spaces are provided as surface car parking. The surface car parking includes:

- 15 no. Residential Spaces,
- 4 no. Car Share/Car Club spaces,
- 2 no. Set Down spaces,
- 2 no. Retail spaces,
- 6 no Medical GP spaces,
- 3 no. Community spaces and
- 1 no. dedicated 24/7 operational loading bay on-site.

The development proposes a total of 18 no. spaces (equating to 9.3% of all parking spaces) disabled spaces comprising 12 no. spaces at basement level and 6 no. spaces at surface level.

The parking proposals include the following;

- 4 no. Car Share parking spaces,
- 3 no. Set Down/Loading Bays,
- 18 no. dedicated mobility impaired parking spaces (9%),
- 103 no. Electric Vehicle and charging point spaces (53%),
- 180 no resident's car parking spaces,
- 10 no. motorbike spaces.



In accordance with the CDP, the subject site is located in Zone 2, which requires 1 space per dwelling in accordance with Table 2 in Appendix 5, Volume 2 of the CDP. We note that the CDP states that its car parking standards “shall be generally regarded as the maximum parking provision” and 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”. The CDP also states that residential spaces are mainly: “to provide for car storage to support family friendly living policies in the City. It is not intended to promote the use of the car within the City”.

In addition to the requirements of the CDP, it is noted that the Apartment Guidelines, states (under Section 4.23) that: “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.”

The development proposal caters for 194 no. car parking spaces to cater for 321 no. dwellings proposed, equating to c. 0.6 spaces per unit which is considered acceptable and in accordance with the aforementioned guidelines. Further details of the proposed car parking and rationale for the proposed quantum are set out in the enclosed Traffic and Transport Assessment document prepared by DBFL Consulting Engineers – please refer to section 4.3 of same for details.

The Apartment Guidelines also have regard to car parking for new apartment schemes and seek to reduce car parking, where possible, in favour of more sustainable modes of transportation, and state the following with regard to ‘Central and/or Accessible Urban Locations’: “In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking **provision to be minimised, substantially reduced or wholly eliminated in certain circumstances**”, [Our emphasis added].

The Apartment Guidelines define ‘Central and/or Accessible Urban Locations’ as: “locations are most likely to be in cities, especially in or adjacent to (i.e., within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or **within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services**”, [Our emphasis added].

The subject site is clearly defined as a ‘Central and/or Accessible Urban Location’ within the context of the Apartment Guidelines, based upon the site’s proximity to an existing high quality public transport (Swords Road QBC) and proposed public transport routes (BusConnects Corridor on Swords Road and the proposed Metro North route to the west). Therefore, the car parking provision for the development can be appropriately: “minimised, substantially reduced or wholly eliminated in certain circumstances” as recommended by the Apartment Guidelines.

We also note that in his assessment of the previous SHD application (Ref. ABP-310910-21) on the subject site for a similar form of development (i.e. 350 no. dwellings), whereby 209 no. spaces (0.6 / apartment) was proposed, the An Bord Pleanála Inspector stated: “In support of the lower levels of car parking provision the application provides analysis of current car parking demand within the area based on CSO data relating to average ownership and modal split. A car parking management strategy is provided as part of the application documentation. I note the report of the planning authority Transportation Planning Section and having regard to national policy set out in the Apartment Design Guidelines which promotes reduced levels of car parking provision in such locations, I regard the proposals in this case as acceptable”.



#### 7.1.14 Bicycle Parking

In total, the proposed development caters for 740 no. bicycle parking spaces, provided in the form of basement level parking, surface level parking, and within the proposed buildings. The 740 no. cycle provision includes:

- 690 no. standard 'long term' spaces (664 no. spaces at basement level, 10 no. spaces within the ground floor level at Block G and 16 no. covered spaces at surface level). These will be allocated to both residents (660) and staff (14).
- 8 no. cargo parking spaces is proposed within the secure basement area.
- 58 no. 'short term' parking located at surface level.

Further details of the proposed bicycle parking and rationale for the proposed quantum are set out in the enclosed TTA prepared by DBFL Consulting Engineers – please refer to section 4.4 of same.

We note that in accordance with the Table 1 in Appendix 5, Volume 2 of the CDP, the proposed development is required to provide for 1 no. cycle space per bedroom for apartments, which would equate to 557 no. spaces. However, it is noted that the Apartment Guidelines, states new apartment schemes should generally cater for 1 no. bicycle parking space per bedroom plus 1 no. visitor parking space for every 2 no. dwellings, which would equate to 718 no. spaces. As stated above, the proposed development caters for a total 740 no. bicycle parking spaces which is in excess of the required standards and ensures that ample bicycle parking will be available within the proposed scheme for the proposed uses.

#### 7.1.15. Climate Action

Chapter 3 of the CDP relates to "Climate Action" and contains the following policies / objectives relevant to the proposed development:

**Policy CA1: National Climate Action Policy** *"To support the implementation of national objectives on climate change including the 'Climate Action Plan 2021: Securing Our Future' (including any subsequent updates to or replacement thereof), the 'National Adaptation Framework' 2018 and the 'National Energy and Climate Plan for Ireland 2021-2030' and other relevant policy and legislation."*

#### **Proposed Development's Compliance**

The design of the subject development is based upon best practice urban design principles, and the layout takes into account energy efficiency in the built environment. This application includes Climate Action & Energy Statement, a Building Life Cycle Report, Operational Waste Management Plan, and other technical documents to demonstrate that energy consumption within the development, both during the construction and operational phases has been considered as part of the design process. The development has been carefully designed to make efficient use of the lands available, while also integrating into its surroundings. All of the residential units within the scheme will be energy efficient, with target NZEB rating. Electric car charging parking spaces are provided within the development. The basement car park has been designed to easily facilitate the roll out of charging points for electric cars as demand increases. The number of electric vehicles charging points throughout the site exceeds to the required 50% standard, i.e. 103 no. Electric Vehicle and charging point spaces are provided for which equates to 53%.





**Policy CA2: Mitigation and Adaption** *“To prioritise and implement measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice.”*

#### **Proposed Development Compliance**

The design of the subject development is based upon best practice urban design principles and takes into account energy efficiency in the built environment. As per previous SHD planning applications Ref.s ABP-310910-21 & ABP-314019-22, technical documents were submitted with those applications which ensure that energy consumption within the development include measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice (subject to change). Please refer to the enclosed Energy Statement and climate chapter of the EIAR for further details.

**Policy CA3: Climate Resilient Settlement Patterns, Urban Forms and Mobility** *“To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019.”*

#### **Proposed Development Compliance**

The design of the subject development supports a low carbon, climate resilient city in accordance with the National Planning Framework, 2018 and the Eastern & Midland Regional Spatial and Economic Strategy, 2019. The proposed seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity in accordance with current Buildings Regulations. Please refer to the accompanying Building Life Cycle Report for details of compliance with the same.

Section 7.1.17 further on in this Statement of Consistency sets out our response to other policies/objectives that are considered to be relevant to the proposed development, as set out in Chapter 3 of the CDP – please refer to same.

#### **7.1.16 Shape & Structure of the City**

Chapter 4 of the CDP relates to “*Shape and Structure of the City*” and sets out a number of policies / objectives relevant to the proposed development, which are detailed below.

Section 4.5.2 of the CDP “Approach to the Inner Suburbs and Outer City as Part of the Metropolitan Area” states: *“A key objective will be to ensure that these large suburban areas are integrated into the structure of the city, both in relation to the city centre and the metropolitan area. Future development will be aligned with the strategic development areas and corridors set out under the Dublin MASP and further opportunities for intensification of infill, brownfield and underutilised land fully explored, particularly where it aligns with existing and future public transport infrastructure”.*

Section 4.5.2 of the CDP also states: *“Also within the outer city are the smaller neighbourhood centres. These support the other higher order urban villages. They provide an important role for local communities for day to day needs and are considered appropriate localities for a range of community services. The strategic approach of the plan is to continue to consolidate and environmentally upgrade these local centres”.*

**Policy 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”.*



## **Proposed Development's Compliance**

The subject site is located in Santry, being positioned to the north of a Key Urban Village (KUV) i.e. KUV 11 Omni Shopping Centre and east of the Strategic Development Regeneration Area (SDRA) no. 2 "Ballymun". It is considered that the proposed development wholly supports the above stated policy of the CDP. The proposed development promotes efficient use of an underutilised, brownfield site, in an urban area, adjacent to a high quality public transport corridor, thereby supporting sustainable consolidation of the city and sustainable re-development of a brownfield site. The development provides for mixed / neighbourhood uses in the form of retail, medical suite / GP practice and community/arts & culture uses to provide for essential employment, economic and community outlets in the area. The development also caters for residential use at an efficient density.

Section 7.1.17 overleaf in this Statement of Consistency sets out our response to other relevant policies/objectives set out in Chapter 4 of the CDP – please refer to same.

Please also refer to Section 7.1.17 overleaf which sets out our response to the relevant policies/objectives set out in:

Chapter 5: "Quality Housing & Sustainable Neighbourhoods",  
Chapter 6: "City Economy & Enterprise",  
Chapter 7: "The City Centre, Urban Villages and Retail",  
Chapter 8: "Sustainable Movement & Transport"  
Chapter 9: "Sustainable Environmental Infrastructure and Flood Risk"  
Chapter 10: "Green Infrastructure and Recreation"  
Chapter 11: "Built Heritage and Archaeology"  
Chapter 12: "Culture".

### 7.1.17 Response to Other Relevant Policies/Objectives of the Development Plan:

| Chapter No.                | Section | Policy / Objective Number | Policy / Objective  | Compliance  |
|----------------------------|---------|---------------------------|---|---|
| Chapter 3 – Climate Action | 3.5.2   | CA6                       | Retrofitting and Reuse of Existing Buildings To promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction, where possible. See Section 15.7.1 Re-use of Existing Buildings in Chapter 15 Development Standards.  | It is proposed to demolish all structures on site which are considered to be of no architectural or conservation merit. We note from the planning history attached to the site that neither Dublin City Council or An Bord Pleanála specifically objected to the principle of demolition of these buildings. While an existing “industrial” building is proposed to be demolished, the proposal is providing a total of 321 no. residential units, which is considered to be a positive net gain, having regard to the acknowledged lack of housing units, typically termed ‘a housing crisis’, and the overarching policy drive to make more efficient use of suitable, well-located development sites. In the previous SHD application (Ref. ABP-310910-21) the Planning Authority did not raise an objection in principle to the demolition of the existing building on the site, to which the An Bord Pleanála Inspector concurred. |
|                            |         | CA8                       | Climate Mitigation Actions in the Built Environment<br>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; f. minimising the generation of site and construction waste and maximising reuse or recycling; g. the use of construction materials that have low to zero embodied energy and CO2 emissions; and h. connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible | An Energy Statement is enclosed with this LRD application, prepared by Morley Walsh.<br><br>In relation to part (a), the scheme will be appropriately ventilated and as demonstrated in the Daylight and Sunlight Assessment Report, the proposed development will receive quality daylight.<br><br>The site is located proximate to active and public transport modes.   |
|                            |         | CA9                       | Climate Adaptation Actions in the Built Environment<br>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:   | The scheme includes green/blue roofs, SuDS measures and opportunities for biodiversity and green infrastructure enhancement, thus demonstrating that the scheme will be a sustainable, climate friendly development   |

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|  |  |      | <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>  |   |
|  |  | 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 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</p>   | An Energy Statement is enclosed with this LRD application. Heating and low carbon solutions are incorporated as part of the proposed strategy for the development.  |
|  |  | 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>  | An Energy Statement is enclosed with this LRD application. Due to local constraints, it is likely that district heating may not be a viable option.   |
|  |  | 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: • 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.</p> | It is considered that due to the location of the development, further evaluation of the Dublin District Heating System was not considered as a connection may not be feasible. Please refer to the submitted An Energy Statement. |

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|   |       | CA24 | Waste Management Plans for Construction and Demolition Projects<br>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.  | The proposed development has been designed in line with best practice principles, and a Construction and Demolition Waste Management Plan (prepared by AWN) is enclosed as an appendix to Chapter 13 of the submitted EIAR – please refer to same.   |
|   | 3.5.5 | CA25 | Electric Vehicles<br>To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation   | Some 53% 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.  |
|   | 3.5.6 | CA27 | Flood Risk Assessment and Adaptation<br>To address flood risk at strategic level through the process of Strategic Flood Risk Assessment, and through improvements to the city's flood defences   | Please refer to the submitted Site Specific Flood Risk Assessment (SSFRA) prepared by DBFL Consulting Engineers.   |
|   | 3.5.7 | CA29 | Climate Action and Green Infrastructure<br>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/blue roofs and landscaping.   |
| Chapter 4 – Shape and Structure of the City | 4.5.1 | SC2  | City's Character<br>To develop the city's character by:<br><ul style="list-style-type: none"> <li>• cherishing and enhancing Dublin's renowned streets, civic spaces and squares;</li> <li>• 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;</li> <li>• 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;</li> <li>• revitalising the north and south Georgian squares and their environs and realising their residential potential;</li> <li>• upgrading Dame Street/College Green as part of the grand civic spine;</li> <li>• promoting the development of Moore Street and the Parnell Quarter as major new cultural and historical attractions for the city.</li> </ul> | The City's character is cherished, developed, and protected with this proposal. Please refer to the submitted Architectural Design Statement for details.  |
|   |       | SC4  | Recreational and Cultural Events<br>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.  | Please refer to the submitted Architectural Design Statement for details. The proposed development provides for c. 1,490m <sup>2</sup> of community/cultural use space provided on the ground floors of Blocks C-D and E-F. Should the total proposed space be in excess of their needs, final details of the end user of the proposed community/cultural use space are to be agreed with DCC, but 5% space allocation has been made available for |



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|  |       |      |  | Cultural and Community spaces. It is considered that the final layout of the community/cultural spaces may ultimately be agreed through compliance with Dublin City Council, however, the enclosed Cultural Impact Assessment report, prepared by Turley, suggests/confirms that the allocated space may be used for e.g. dance studio, artist workshop etc. as there we understand there is a demand in the local area for such uses / as identifying occupiers at this juncture is likely futile whilst the planning application goes through the planning and construction process.  |
|  |       | SC5  | Urban Design and Architectural Principles<br>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   | Please refer to the submitted Architectural Design Statement for details.   |
|  | 4.5.2 | SC8  | Development of the Inner Suburbs<br>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 site is zoned Z3: "Neighbourhood Centres" which has the objective <i>"To provide for and improve neighbourhood facilities"</i> . In this regard, the scheme maximises the opportunity to densify this infill, brownfield, underutilised land in proximity to public transport and walking and cycling infrastructure, whilst also creating new public open spaces that connect with existing open space to the north and south of the site. The proposed development opens up the site to permeability, creates new spaces that people can easily connect to and utilise, whilst also providing for ground floor mixed/neighbourhood uses.                  |
|  |       | SC9  | Key Urban Villages, Urban Villages and Neighbourhood Centres<br><br>To develop and support the hierarchy of the suburban centres, including Key Urban Villages, Urban Villages and Neighbourhood Centres, in order to: <ul style="list-style-type: none"> <li>▪ support the sustainable consolidation of the city and align with the principles of the 15 minute city;</li> <li>▪ provide for the essential economic and community support for local neighbourhoods; and</li> <li>▪ promote and enhance the distinctive character and sense of place of these areas by ensuring an appropriate mix of retail and retail services.</li> </ul> | The subject site lies to the north of KUV 11 "Omni" and the proposed development will tie into the existing environs while also delivering local / neighbourhood uses at ground floor level, which will benefit the local community. The development promotes efficient use of an underutilised site thereby supporting sustainable consolidation of the city and sustainable re-development of a brownfield site. The development provides for retail, GP practice and community/arts & culture uses to provide for essential employment, economic and community outlets in the area. The development also caters for residential use at an efficient density. |
|  | 4.5.3 | SC10 | Urban Density<br><br>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,   | The proposed development represents an appropriate density for the area. Please refer to section 5.3 of this Statement of Consistency for details on the proposed development's compliance with the Sustainable Residential Development and Compact Guidelines for Planning Authorities, 2024, as well as the preceding Urban Design Manual: A Best Practice Guide, 2009 (refer to section 5.4).  |

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|  |       |      | 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.   |  |
|  |       | SC11 | <p>Compact Growth</p> <p>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"> <li>• enhance the urban form and spatial structure of the city;</li> <li>• be appropriate to their context and respect the established character of the area;</li> <li>• include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;</li> <li>• be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;</li> <li>• 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.</li> </ul> | The proposed development, and its associated density, provides for a compact form of growth on what is considered to be an underutilised, brownfield site, that has been acknowledged as being located on a public transport corridor. The site is adjacent to public transport links i.e. bus and is close to a wide range of social and community infrastructure. The development provides services for the surrounding community. Please also refer to the submitted Planning Statement and Architectural Design Statement for details. |
|  |       | SC12 | <p>Housing Mix</p> <p>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, two bed - four person and three bed units. There is a provision of 10% Part V units. Please refer to preceding section 7.1.3 of this statement and section 6.1 of the submitted Planning Statement for more details on dwelling mix.  |
|  |       | SC13 | <p>Green Infrastructure</p> <p>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 and green/blue roofs proposed for the development. The site is being opened up to create a new urban quarter that promotes pedestrian & cyclist connectivity as well as creating urban open spaces for the use of the public and future residents. Please refer to the submitted Architectural Design Statement and landscaping proposals for details.  |
|  | 4.5.4 | SC14 | <p>Building Height Strategy</p> <p>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>  | There is a building height strategy for the buildings and massing to integrate with the existing and proposed context and urban form – this is clearly detailed in the submitted Architectural Design Statement. Please also refer to Section 5.1 of this Statement of Consistency which also provides a full response to the relevant SPPRs of the Urban Development and Building Height Guidelines for Planning Authorities (2018).  |

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|  |       | SC15 | <p>Building Height Uses</p> <p>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, retail, GP practice and community/arts/cultural uses proposed for the site. Please refer to the submitted Architectural Design Statement for details, as well as Section 5.1 of this Statement of Consistency which also provides a full response to the relevant SPPRs of the Urban Development and Building Height Guidelines for Planning Authorities (2018).</p>  |
|  |       | SC16 | <p>Building Height Locations</p> <p>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 heights of the buildings are stepped, from a minimum of 7 storeys up to a maximum of thirteen storeys (Block A). The height has been carefully considered in terms of the receiving environs and the planning history attached to the subject site. The proposed maximum height of 13 storeys is appropriately positioned at the corner of the site at the junction of Swords Road and Santry Avenue in the form of Block A and will act as a landmark building at this important node as one enters the city. Please refer to the submitted Architectural Design Statement for further details.</p>   |
|  |       | SC17 | <p>Building Height</p> <p>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"> <li>▪ follow a design led approach;</li> <li>▪ include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3);</li> <li>▪ make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;</li> <li>▪ deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced;</li> <li>▪ Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and</li> <li>▪ have regard to the performance-based criteria set out in Appendix 3.</li> </ul> | <p>The proposed heights are modulated throughout the site, varying from a minimum of 7 no. storeys up to a maximum of 13 no. storeys, in one location only. The highest element of the scheme is appropriately positioned at the corner of the site at the junction of Swords Road and Santry Avenue and will act as a landmark building at this important node as one enters the city. The submitted Architectural Design Statement details the urban design rationale for the proposed development which also demonstrates how proposed massing was derived and works with the existing surrounding context. Please refer to the submitted Architectural Design Statement for further details.</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>   | <p>The proposed development positively contributes to the city's built environment with high quality architecture. Please refer to the submitted Architectural Design Statement for details.</p>   |
|  |       | SC20 | <p>Urban Design</p>   | <p>The proposed development follows the principles set out in the Urban Design Manual, as detailed in the submitted Architectural Design Statement and under section 5.4 of this Statement of Consistency, thus responding to all the criteria. The submitted DBFL</p>   |

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|  |       |       | 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).  | Engineering Services Report confirms that the proposed development has been designed to accord with the recommendations of DMURS, to provide ‘self-regulating’ streets, and that design speed limits have been applied throughout the development as per Design Manual for Urban Roads and Streets (DMURS). A statement of consistency with DMURS is included as part of this LRD planning application.   |
|  |       | SC11  | Architectural Design<br><br>To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city’s character and which mitigates and is resilient to, the impacts of climate change.  | The architectural design is contemporary and is resilient to the impacts of climate change. An Energy Statement is included as part of this LRD application, the aim of which is to ensure that a holistic, sustainable approach has been adopted by the design team for the proposed development”.   |
|  |       | SC22  | Historical Architectural Character<br><br>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.  | As part of the current SHD application, the DCC Conservation Officer requested that the applicant set out the history, architecture and identify all significant features of the existing building, based upon the historic industrial nature of Santry. To that end, an Architectural Heritage Impact Assessment (AHIA) has been prepared detailing the history of the building and providing details of the construction and condition of the building, including photographs. Please refer to the submitted AHIA, by Dermot Nolan, for more details. |
|  |       | SC23  | Design Statements<br><br>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.   | This submission includes an Architectural Design Statement prepared by Davey+Smith Architects, which is enclosed as a separate document.  |
| Chapter 5 - Quality Housing and Sustainable Neighbourhoods | 5.5.1 | QHSN2 | National Guidelines<br><br>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. | The proposed development has regard to the aforementioned DEHLG Guidelines, which is demonstrated in section 5 of this Statement of Consistency, which also provides responses to the relevant Policy Documents. In relation to affordable housing, the Applicant intends to meet their Part V obligations by providing 32 no. Part V units on site and in relation to housing options for older persons, some 81 no. larger, universally designed dwellings have been included in the proposal.  |

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|  |       | QHSN5  | <p>Community Led Regeneration</p> <p>To ensure that regeneration of estates and communities will be planned with the needs of existing and future residents at the core.</p>  | <p>The subject scheme will provide much needed residential units, as well as neighbourhood ground floor uses such as retail, GP practice and community/arts/ cultural space that will provide additional services for the surrounding community.</p>   |
|  |       | QHSN10 | <p>Urban Density</p> <p>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.</p>  | <p>The proposed development is of appropriate density for the area having regard to its location on an acknowledged public transport corridor, its underutilised nature and in an outer city location that is well serviced.</p>   |
|  | 5.5.3 | QHSN11 | <p>15-Minute City</p> <p>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.</p>   | <p>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 refer to the submitted Planning Statement, Architectural Design Statement, Social Infrastructure Assessment and Traffic &amp; Transport Assessment for details.</p>  |
|  |       | QHSN12 | <p>Neighbourhood Development</p> <p>To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city;</li> <li>• 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;</li> <li>• promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model.</li> </ul> | <p>The proposed development opens up an underutilised, closed off site to new development, accessibility, thus creating a new urban quarter in Santry. The proposed development encourages neighbourhood development and enhances the quality of the built environment with an appropriate mix of uses. The scheme encourages sustainable and low carbon transport modes and promotes a low traffic neighbourhood. The development compliments materials utilised in the environs 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 and Compact Settlements Guidelines and the Design Manual for Urban Roads and Streets (DMURS). The development provides public realm improvements, and all public spaces will be passively overlooked, ensuring they are safe and secure for all users.</p> <p>Please refer to the submitted Planning Statement, Architectural Design Statement, Traffic and Transport Assessment and landscaping proposals for further details.</p> |



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|  |       |        | <ul style="list-style-type: none"> <li>• promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance;</li> <li>• promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects;</li> <li>• cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion;</li> <li>• provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life;</li> <li>• 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)';</li> <li>• are designed to promote safety and security and avoid anti-social behaviour.</li> </ul> |  |
|  | 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, retail, GP practice and community/arts/cultural uses, 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 and are in accordance with the 7 no. principles of Universal Design. A specific Universal Access Statement is submitted as part of this LRD planning application.   |
|  |       | 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 proposed development provides a mix of dwelling units, retail, GP practice and community/arts/cultural uses, in addition to landscaped open spaces including children's play. Older persons and persons with physical impairments will be able to access the open space areas due to their careful design in terms of levels, siting and uses. The dwelling sizes will facilitate young families or older persons looking to downsize for example and this will serve the needs of a range of persons. Some 81 no. larger, universally designed units are provided to cater for the needs of an ageing |

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|  |       |        |   | population. Therefore, the needs of persons in various stages of their lives have been considered in the proposed housing mix of the scheme.   |
|  |       | QHSN18 | Needs of an Ageing Population<br><br>To support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's 'Age Friendly Principles and Guidelines for the Planning Authority 2020', the Draft Dublin City Age Friendly Strategy 2020-2025 and Housing Options for our Aging Population 2019.  | The proposed dwellings in the development and outdoor spaces are universally accessible. Some 81 no. larger, universally designed units are provided to cater for the needs of an ageing population and have been designed having regard to the relevant guidelines.   |
|  |       | QHSN19 | Youth Friendly City<br><br>To promote and support a youth friendly city including the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure. To promote a built environment in the inner city, developing areas and Strategic Development Regeneration Areas which support the physical and emotional well-being of children and young people. To promote policies and objectives that have regard to the Children and Young People's Plans prepared by the Dublin City North and Dublin City South Children and Young People's Services Committees and any future DCC Youth Friendly City Strategy including any future youth homeless strategy. | <p>The submitted Social Infrastructure Assessment, as well as the planning history attached to site, confirm that there is no need for a childcare facility to be provided as part of the current proposal, particularly in light of the crèche in the adjoining development in Santry Place.</p> <p>Play areas for children have been incorporated into the scheme to encourage physical activity and integration, and the community/arts/cultural space provided may also serve the needs of the young population (depending on final use to be agreed with Dublin City Council post-planning).</p>  |
|  |       | QHSN21 | Gated Residential Development<br><br>It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods  | <p>The subject site is gated and in private use in its current form; however, the proposal is to open up the site in the form of a new urban quarter, creating pedestrian and cyclist friendly links through the site from Swords Road to Santry Avenue and into the adjoining Santry Place development, and minimising vehicular movements within the site, with no through vehicular traffic provided for as a result of the high quality design. The public open spaces will be accessible to the public, with communal open spaces carefully designed into the scheme to cater for the needs of residents.</p> <p>The development provides a good balance between providing easily accessible public open spaces in addition to some more private/semi-private communal spaces for residents' use.</p> |
|  | 5.5.5 | QHSN22 | Adaptable and Flexible Housing<br><br>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  | The housing units are adaptable and flexible. In this regard, we note that 81 no. larger, universally designed units are provided, which can be identified on the submitted drawings and HQA with/by red text.   |

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|  |       |         | Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015.   |  |
|  |       | 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 universally accessible. Some 81 no. larger, universally designed units are provided.  |
|  |       | 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&amp;H's Design Manual for Quality Housing 2022 and the DHP&amp;LG &amp; DH's Housing Options for Our Ageing Population Policy Statement 2019.</p> | <p>The proposed housing units in the development and outdoor spaces are universally accessible. Out of the 321 no. units proposed, 212 no. (c.65%) are over the minimum 10% minimum area, and of these 212 no. units, 81 no. are designed to be universal design.</p> <p>Please refer to the submitted Housing Quality Assessment (HQA) and plans of the units for more 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 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.</p>  | The development will provide 32 no. social housing units (10% of the total units), which is in accordance with Part V of the Planning and Development Act 2000 (as amended).   |
|  | 5.5.7 | QHSN36  | <p>High Quality Apartment Development</p> <p>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.</p>  | The apartments are designed to a high quality which will avail of sufficient daylight/sunlight, as confirmed by the submitted Daylight/Sunlight Assessment by CS Consulting. Please also refer to the submitted Social Infrastructure Assessment which demonstrates that the development will be well served by local services/facilities.   |
|  |       | QHSN37  | Houses and Apartments  | The proposed housing and apartments are a mix of 1 no. bed (two person), 2 no. bed (three person), 2 no. bed (four person) and 3 no. bed units. There is a provision of 10% Part V units. The units range in shapes and sizes. Please refer to the submitted Planning Statement, HQA and architectural plans for more details.   |

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|  |       |        | 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.   |  |
|  |       | QHSN38 | <p>Housing and Apartment Mix</p> <p>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.</p> | <p>The proposed housing and apartments are a mix of 1 no. bed (two person), 2 no. bed (three person), 2 no. bed (four person) and 3 no. bed units. There is a provision of 10% Part V units. The units range in shapes and sizes. Please refer to the submitted Planning Statement, HQA and architectural plans for more details.</p> <p>The subject site is not located in the Liberties or the North Inner City so the unit mix for those areas is not applicable to the subject site.</p> |
|  |       | QHSN39 | <p>Management</p> <p>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.</p>  | <p>A Property Management Strategy Report is enclosed as part of this LRD planning application as a separate document – please refer to same.</p>   |
|  | 5.5.8 | QHSN47 | <p>High Quality Neighbourhood and Community Facilities</p> <p>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.</p>   | <p>Community/arts/cultural space is proposed as part of the development at ground floors of Blocks C-D &amp; E-F. It is also envisaged that the final user and layout of the community/cultural spaces will ultimately be agreed through compliance with Dublin City Council, upon receipt of a grant of permission for the proposed development.</p>  |
|  |       | QHSN48 | <p>Community and Social Audit</p> <p>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.</p>  | <p>A Social Infrastructure Assessment is submitted as a separate report 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 designated community/arts/cultural space in line with the Development Plan, will further enhance the availability of social infrastructure in the area.</p>   |
|  |       | QHSN49 | <p>Phasing</p> <p>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</p>   | <p>A phasing plan is included, please refer to section 15 of the submitted Planning Statement as well as the enclosed Davey+Smith drawing no. D1809.P30 'Site Layout - Phasing' which illustrates how the development will be phased.</p>  |

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|   |       |         | infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.  |   |
|   |       | QHSN50  | Inclusive Social and Community Infrastructure<br><br>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 universally accessible.   |
|   |       | QHSNO15 | Community Safety Strategy<br><br>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 this LRD planning application as a separate document.  |
|   |       | QHSN55  | Childcare Facilities<br>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. | As outlined above, the submitted Social Infrastructure Assessment, as well as the planning history attached to site, confirm that there is no need for a childcare facility to be provided as part of the current proposal, particularly in light of the crèche in the adjoining development in Santry Place.   |
|   |       | QHSN58  | Culture in Regeneration<br>To recognise culture as an important mechanism in regeneration, with the potential to act as a catalyst for integration, community development and civic engagement.   | The ground floors of Blocks C-D & E-F have been designated to accommodate cultural/arts/community use, the final use to be agreed with Dublin City Council at a later date. This will contribute towards achieving this policy. However, a Cultural Infrastructure (Impact) Assessment (CIA) has been undertaken and is submitted with this LRD application which provides guidance on the types of uses that may be accommodated within the development, in agreement with Dublin City Council / Dublin Arts Office, as appropriate. |
|   |       | QHSN60  | Community Facilities<br><br>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.   | The ground floors of Blocks C-D & E-F have been designated to accommodate cultural/arts/community use, the final use to be agreed with Dublin City Council at a later date. This will contribute towards achieving this policy. However, a Cultural Infrastructure (Impact) Assessment (CIA) has been undertaken and is submitted with this LRD application which provides guidance on the types of uses that may be accommodated within the development, in agreement with Dublin City Council / Dublin Arts Office, as appropriate. |
| Chapter 6 - City Economy and Enterprise | 6.5.1 | CEE1    | Dublin's Role as the National Economic Engine   | The proposed development will support the economy by way of its construction activity, but also due to the mix of uses proposed. These will have an economic and employment benefit once operational.   |



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|  |       |        | <p>(i) To promote and enhance the role of Dublin as the national economic engine and driver of economic recovery and growth, with the city centre as its core economic generator.</p> <p>(ii) To promote and facilitate Dublin as a creative and innovative city that is globally competitive, internationally linked, attractive and open.</p> <p>(iii) To promote an internationalisation strategy building mutually-beneficial economic and other links with key cities globally to encourage investment and tourism in Dublin</p> | In addition, augmenting the stock of housing in the city will meet ongoing shortages which are recognised as being detrimental to the city and State's economic performance.   |
|  | 6.5.2 | CEE7   | <p>Strategic and Targeted Employment Growth</p> <p>To promote strategic and targeted growth of strategic development areas and corridors in accordance with the RSES and MASP with a focus on the city centre, the Docklands, the Outer City and Key Urban Villages and Neighbourhood Centres/Urban Villages</p>  | Santry is located in the Outer City and the proposed development, including its mix of uses, provides for sustainable growth as part of a new urban quarter, within a long established suburb of the City.   |
|  | 6.5.3 | CEE12  | <p>Transition to a Low Carbon, Climate Resilient City Economy</p> <p>To support the transition to a low carbon, climate resilient city economy, as part of, and in tandem with, increased climate action mitigation and adaptation measures.</p>  | <p>The development will play a role in supporting this transition due to:</p> <ul style="list-style-type: none"> <li>▪ Its proximity to public transport options;</li> <li>▪ Its proximity to existing services and amenities;</li> <li>▪ The proposed mix of uses;</li> <li>▪ Energy efficiency measures incorporated into the design etc.</li> </ul>   |
|  |       | CEE13  | <p>Towards a Green and Circular Economy</p> <p>To support the growth of the 'green economy' including renewable energy, retrofitting, and electric vehicles and charging infrastructure and to support the transition towards a circular economy in line with national policy and legislation</p>   | <p>Solar panels may be incorporated into the development, which will generate renewable energy for use.</p> <p>Some 53% (103 no.) of the car parking spaces are EV equipped. Car share spaces are also proposed and will support the circular economy.</p> <p>A Construction &amp; Demolition Waste Management Plan (prepared by AWN) is included as an appendix to Chapter 13 of the submitted EIAR which demonstrates how to minimise waste and maximise reuse of materials during the demolition and construction stages.</p> |
|  |       | CEE34  | <p>Craft Enterprises</p> <p>To recognise that craft enterprises, designers' studios/workshops etc., along with visitor centres, provide economic development and regeneration potential for the city, including the promotion of tourism. To promote Dublin city centre as a destination for such creative industries and for the cultural and artistic sectors</p>   | The ground floors of Blocks C-D & E-F have been designated as cultural/arts/community use, the final use to be agreed with Dublin City Council at a later date. A Cultural Infrastructure (Impact) Assessment (CIA) has been undertaken and is submitted with this LRD application which provides guidance on the types of uses that may be accommodated within the development, in agreement with Dublin City Council / Dublin Arts Office, as appropriate.   |
| Chapter 7 – The City Centre, Urban Villages and Retail | 7.5.1 | CCUV18 | <p>Residential Development</p> <p>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.</p>  | The proposed mixed-use development predominately contains residential units in addition to a retail, GP and community / arts / cultural uses.  |

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|  | 7.5.8 | CCUV37 | <p>Plan Active and Healthy Streets</p> <p>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 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.</p> | <p>The proposed development is laid out in a manner that provides for pedestrian priority access into, through and out of the site. The layout and the punctuations between the buildings open up the entire site to accessibility, connectivity and enlivenment. In addition, the proposed public spaces will be plentiful and high-quality, thus contributing towards providing a vibrant, attractive, accessible and safe development. The spaces will enhance connectivity and will enliven the subject site, as it creates a new urban quarter and connects directly to the space in the adjoining Santry Place. All spaces will be universally accessible.</p>   |
|  |       | CCUV39 | <p>Permeable, Legible and Connected Public Realm</p> <p>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</p>   | <p>The proposed development creates a permeable and legible public realm that contributes to the key objectives of the Development Plan</p>  |
|  |       | CCUV40 | <p>Public Safety</p> <p>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</p>  | <p>The proposed development creates a safe public realm with passive surveillance.</p>   |
|  |       | CCUV44 | <p>New Development</p> <p>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.</p>   | <p>The proposed development will deliver a high-quality and well-designed public realm including open spaces for use by both future residents and the wider local community. The public realm and green infrastructure will create linkages and connection and will enhance accessibility. Materials used within the scheme will be durable and high-quality.</p>  |
| 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>   | <p>The proposed development complies with the overriding principles in relation to the promotion of active mobility (new infrastructure provision and secure on-site parking opportunities), appropriate density in terms of the site's excellent accessibility levels, in parallel with discouraging private car use by restricting car parking provision as an integral demand management initiative.</p> <p>The car parking provision at a ratio of C.0.6 spaces per unit has sought to provide a minimised number of spaces rather than the maximum DCC standard due to the accessible urban nature of the site, with the nearby alternative active and sustainable travel choices highlighted. A Mobility Management Plan is enclosed which outlines the strategies with which modes other than private car use will be promoted within the site. Further ample consideration in the design process has been given to pedestrians and</p> |

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|  |       |       |  | cyclists to provide a permeable site for these active modes in addition to a generous provision of cycle parking.   |
|  |       | SMT2  | Decarbonising Transport<br><br>To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.  | 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, with the remainder of the basement car parking provision being future-proofed to facilitate a conversion of these spaces into EV charging spaces.<br><br>The submitted TTA states that there will be 103 no. parking spaces fitted with electrical charging equipment, which equals to 53%, which exceeds the DCC Development Plan requirement of 50% of the total quantum for electric vehicles. |
|  |       | SMT01 | Transition to More Sustainable Travel Modes<br><br>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). | The proposed development complies with the overriding principles particularly in regard to the promotion of sustainable transport whilst discouraging private car use. The proposed development's predicted modal split, as detailed in the submitted Traffic and Transport Assessment is comparable with the city mode share targets. The submitted Mobility Management Plan outlines the strategies with which modes other than private car use will be promoted within the site after its occupancy and in subsequent years.   |
|  | 8.5.2 | SMT3  | Integrated Transport Network<br>To support and promote the sustainability principles set out in National and Regional documents to ensure the creation of an integrated transport network that services the needs of communities and businesses of Dublin City and the region  | The internal pedestrian and cyclist network within the site will serve to connect residents, employees and visitors to the routes outside the site boundary – integrating with the existing and proposed transport networks in the area and being a significant improvement on the current closed condition of the site.  |
|  |       | SMT4  | Integration of Public Transport Services and Development<br>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           | The proposed development complies in regard to the intensification and mixed-use nature of the scheme due to its location along a public transport corridor, which currently benefits from good bus accessibility levels with emerging proposals to further enhance the attractiveness of public transport via future proposed BusConnects.   |
|  |       | SMT6  | Mobility Management and Travel Planning<br><br>To promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for new developments focussed on promoting and providing for active travel and public transport use while managing vehicular traffic and servicing activity.   | A Mobility Management Plan has been prepared by DBFL Consulting Engineers and is submitted – please refer to same.  |
|  |       | SMT7  | Travel Plans for New and Existing Developments   | A Mobility Management Plan has been prepared by DBFL Consulting Engineers and is submitted – please refer to same.  |

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|  |       |       | 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.  |   |
|  | 8.5.3 | SMT8  | <p>Public Realm Enhancements</p> <p>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.</p> | The proposed redevelopment of the subject site from a gated, underutilised, brownfield site, along a key transport corridor into the city, in the outer city, represents a significant improvement to the public realm and streetscape, with high quality landscaping proposals, as well as the opening up the site to accessibility and creating new urban spaces and thus a new urban quarter in Santry.  |
|  |       | SMT9  | <p>Public Realm in New Developments</p> <p>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.</p>  | The proposed development includes the creation of new urban, open spaces which will deliver a high-quality public realm and will be easily accessible to pedestrians and cyclists. Further details of the new open spaces are detailed in the submitted landscape architect's documentation – please refer to same.   |
|  | 8.5.4 | SMT11 | <p>Pedestrian Network</p> <p>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</p>   | The proposed development seeks to open up the entire site and create pedestrian priority routes through the site which will link Swords Road, Santry Avenue and provide direct connections into the adjoining Santry Place development. Furthermore, the proposed non-residential uses are also easily accessible. The proposed public realm will be accessible to all.   |
|  |       | SMT02 | <p>Improving the Pedestrian Network</p> <p>To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users</p>  | The proposed development represents a significant improvement to the public realm and street frontages from its current condition, with the improved pedestrian and cycle routes through the site. The design of these infrastructure improvements has noted this policy and incorporated the recommended measures in the appropriate areas. The incorporation of a pedestrian / cyclist route through the scheme, with minimal vehicular access to the site, further enhances the pedestrian accessibility and permeability in the area – serving a key desire line for pedestrians. |
|  | 8.5.5 | SMT12 | <p>Pedestrians and Public Realm</p> <p>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</p>  | The proposed development represents a significant improvement to the public realm and street frontages from its current condition, with the improved pedestrian and cycle routes through the site. The design of these infrastructure improvements has noted this policy and incorporated the recommended measures in the appropriate areas. The incorporation of a pedestrian / cyclist route through the scheme, with minimal vehicular   |

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|  |       |       |  | access to the site, further enhances the pedestrian accessibility and permeability in the area – serving a key desire line for pedestrians.   |
|  |       | SMT13 | <p>Urban Villages and the 15-Minute City</p> <p>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</p>  | Not directly applicable to the proposed development, however, the proposed development provides for permeable connections through the site which will benefit active travel. The range of existing services in the environs as well as the proposed non-residential units contributes to achieving the 15-minute city.  |
|  |       | SMT14 | <p>City Centre Road Space</p> <p>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.</p>   | Not directly applicable to the proposed development, however, the proposed improvements to the public realm and street frontages from its current condition, with the improved pedestrian and cycle routes through the site represent a significant improvement to the public realm and street corridor with landscaping proposals complementing the improved pedestrian and cycle routes through the site. |
|  | 8.5.6 | SMT16 | <p>Walking, Cycling and Active Travel</p> <p>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.</p>  | As highlighted above, the site layout design has sought to facilitate active travel connections throughout the site through the incorporation of DMURS principles and national best practice to create a permeable environment for active travel users.   |
|  |       | SMT17 | <p>Active Travel Initiatives</p> <p>To promote and help develop community-based coordinated initiatives at local level that encourage active travel and modal switch to sustainable transport modes, and to target underrepresented cohorts/groups in such initiatives</p>   | Initiatives and targets outlined in the submitted Mobility Management Plan aim to promote a modal shift for the site residents and employees.   |
|  |       | SMT18 | <p>The Pedestrian Environment</p> <p>To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice</p> | The proposed pedestrian accessibility throughout the subject site will facilitate a number of direct connections for pedestrians wherever their origin within the site may be, and public realm improvements will benefit the public travelling externally to the site.   |
|  |       | SMT08 | <p>Cycling Infrastructure and Routes</p> <p>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</p>   | Site accesses to the proposed development have been designed with consideration to cyclists to integrate with the existing and proposed cyclist routes along the scheme boundaries.   |



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|  |  |        | 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.   |  |
|  |  | SMT010 | Walking and Cycling Audits<br><br>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   | Section 2.3.2 of the submitted TTA provides details of existing cycling and pedestrian facilities in the environs of the site, while section 2.6 of the TTA examines the accessible catchment areas of the site by foot / bicycle.   |
|  |  | SMT012 | Cycle Parking Spaces<br><br>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  | A number of short-term visitor cycle parking spaces will be available at surface level for visitors to any of the land uses within the subject site. The submitted Traffic and Transport Assessment (section 4.4) further outlines the proportion and location of these spaces.  |
|  |  | SMT014 | Cycle Parking Facilities<br><br>To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high density cycle parking facilities, as well as parking for cargo and adapted bicycles at appropriate locations, taking into consideration the NTA's GDA Cycle Network Plan, and Dublin City Council's Public Realm Strategy.  | While not directly applicable to the proposed development, the proposed development includes the provision of high quality short and long term bicycle parking in accordance with the appropriate development management standards. Cycle parking spaces are available at surface level within the public realm, within surface level bicycle shelters and within basement level bicycle for long-term and short-term uses. The submitted Traffic and Transport Assessment (section 4.4) outlines the various locations and provision of all the cycle parking and cyclist facilities at the subject site. |
|  |  | SMT20  | Walking and Cycling for School Trips<br><br>(a) To prioritise and target a significant increase in the number of children walking and cycling to and from schools;<br>(b) To promote walking and cycling for school trips to all educational facilities;<br>(c) To promote and support initiatives such as "Safe Routes to School", the 'Green Schools' and 'Schools Streets' projects, and to prioritise school routes for permeability projects and provision and enhancements of pedestrian and cycle ways. | Whilst not directly applicable to the subject site, the targets set out within the submitted Mobility Management Plan to promote active travel are in accordance with this objective.  |
|  |  | SMT022 | Shared Bike Schemes and Micro-Mobility Schemes<br><br>To monitor the success of and expand the shared bike schemes and to facilitate the expansion of shared micro-mobility schemes throughout the city, in accordance with ongoing review and new models of operation such as the use of mobility hubs.   | Blepper secured a licence to operate Dublin City Council's station-less bicycle hire scheme. This scheme operates via a mobile application, with the main benefit being that bicycles can be picked-up or dropped-off anywhere that traditional bicycle parking is permitted, and they do not require custom-built docking bays. This initiative is not currently available in the area of the proposed development site. However, visitor / short term bicycle parking is catered for at surface level on site which can accommodate future shared bike schemes.  |

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|  |       | SMT26  | Commuter, Shopping, Business and Leisure Parking<br><br>To discourage commuter parking and to ensure adequate but not excessive parking provision for short-term shopping, business and leisure uses.   | Parking has been provided below the maximum car parking standards of the CDP, with initiatives to encourage the use of active and sustainable modes at the site outlined in the submitted Mobility Management Plan.  |
|  |       | SMT27  | Car Parking in Residential and Mixed Use Developments<br><br>(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.<br>(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.<br>(iii) To safeguard the residential parking component in mixed-use developments | The proposals comply with this policy with a car parking ratio of c.0.6 spaces per residential units. The Apartment Guidelines, as well as CDP guidance has been utilised to determine the appropriate level of parking required at the subject site. The Parking Strategy within the submitted Traffic & Transport Assessment (section 4.3) details the measures which shall be in place to ensure the effective and proper use of the vehicle spaces on site. 4 no. car share vehicles will make up part of the car parking provision. These spaces will reduce the need for residents to own a private car. |
|  |       | SMT29  | Expansion of the EV Charging Network<br><br>To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.  | It is noted that 53% of all on-site car parking spaces will benefit from being fitted with EV charge points, in exceedance of DCC development management standards.  |
|  | 8.5.9 | SMT33  | Design Manual for Urban Roads and Streets<br><br>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.   | DBFL Consulting Engineers have confirmed that the design of the proposed development will comply fully with the guidance detailed in DMURS – refer to their submitted DMURS Statement of Compliance.   |
|  |       | SMT34  | Street and Road Design<br><br>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   | The subject scheme including pedestrian and cyclist infrastructure, and the internal street network will accord with this policy. The development prioritises active travel and public transport.  |
|  |       | SMT036 | Environmental and Road Safety Impacts of Traffic in the City<br><br>To tackle the adverse environmental and road safety impacts of traffic in the city through measures such as:  | This application includes a Stage 1 Safety Audit of the proposed development to ensure that all road safety implications are fully addressed at planning design stage. This ensures that a safe street environment is being implemented / delivered by the proposed development's design.  |

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|   |       |     | <ul style="list-style-type: none"> <li>• 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).</li> <li>• To undertake a study, assessing and identifying areas adjacent to proposed sustainable transport projects for traffic calming and filter permeability.</li> <li>• 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.</li> <li>• To support programmes of action which tackle the issue of road safety in the city.</li> <li>• To promote traffic calming in existing residential neighbourhoods through innovative street design and layout such as homezones, filtered permeability, low traffic neighbourhoods, quiet ways and unsignalized crossings where appropriate.</li> </ul> |   |
| 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 Statement of Design Acceptance (Ref. No. CDS23007437) received and is enclosed with the Appendices of the submitted Infrastructure Design Report prepared by DBFL Consulting Engineers  |
|   |       | SI3 | <p>Separation of Foul and Surface Water Drainage Systems</p> <p>To require all new development to provide separate foul and surface water drainage systems</p>   | The proposed development has separate foul and surface water drainage systems.  |
|   |       | SI4 | <p>Drainage Infrastructure Design Standards</p> <p>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).</p>   | 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 the submitted DBFL Infrastructure Design Report and drawings. |
|   |       | SI6 | <p>Water Conservation</p> <p>To require all developments to incorporate best practice water conservation and demand management measures in order to promote water conservation</p>   | The scheme will incorporate best practice water conservation and demand management measures.  |

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|  |       |      | by all water users, and minimise the pressure for water drawdown, wastage of water supply and reduced availability of water resources.   |   |
|  | 9.5.3 | SI13 | <p>Minimising Flood Risk</p> <p>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.</p>  | DBFL Consulting Engineers have prepared the submitted Site Specific Flood Risk Assessment which concludes that the proposed development passes the Justification Test and the proposed development is deemed appropriate as it is located within Flood Zone C, and does not require a Justification Test. |
|  |       | SI14 | <p>Strategic Flood Risk Assessment</p> <p>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 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</p>  | The proposed development considers the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028 and has been referenced in the Site Specific Flood Risk Assessment by DBFL Consulting Engineers   |
|  |       | SI15 | <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"> <li>• 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.</li> <li>• 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</li> </ul> | Please refer to the submitted Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers for details.  |

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|  |  |      | <p>(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 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"> <li>• 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.</li> </ul> |   |
|  |  | SI18 | <p><b>Protection of Flood Alleviation Infrastructure</b></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>   | <p>DBFL Consulting Engineers have prepared the submitted Site Specific Flood Risk Assessment which finds that the subject site is not at risk from tidal or fluvial flooding due to its geographic location and topography. There is a moderate risk of groundwater flooding the basement of the site. GSI records state that groundwater vulnerability is low, however there were high levels of standing water noted in trial holes during infiltration tests on neighbouring site. Basement design/construction will take this into account. There is also a moderate risk of pluvial flooding due to the potential surcharging and blockage of the new drainage network. A Basement Impact Assessment is also enclosed – please refer to same.</p> <p>Following the assessment of the flood risks to the site and the available information, it is considered that the proposed site is located within Flood Zone Category C as defined by “<i>The Planning System and Flood Risk Management Guidelines for Planning Authorities</i>”, and as indicated by the ECFRAMS maps. Therefore, the proposed residential development on the subject site is appropriate for this flood zone category, and a justification test is not required.</p> |
|  |  | SI20 | <p><b>Basement Flood Risk Management</b></p> <p>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).</p>  | <p>The development includes a basement; however, we note that the site is within Flood Zone C. A Basement Impact Assessment is submitted as part of this LRD application.</p>   |
|  |  | SI21 | <p><b>Managing Surface Water Flood Risk</b></p> <p>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</p>  | <p>SuDS drainage systems have been incorporated into the Development. Please refer to the enclosed DBFL Consulting Engineers Infrastructure Design Report and relevant</p>  |



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|  |       |      | 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.   | drawings. Proposed SUDS methodologies include green roof, blue roof, permeable paving, bio-retention areas, tree pits, and attenuation basins.   |
|  | 9.5.4 | SI22 | <p>Sustainable Drainage Systems</p> <p>To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works and having regard to the guidance set out in Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021). Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design &amp; 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.</p> | SuDS drainage systems have been incorporated into the Development. Please refer to DBFL Consulting Engineers Infrastructure Design Report and relevant drawings. Proposed SUDS methodologies include green / blue roof, permeable paving, bio-retention areas, tree pits, and attenuation basins.  |
|  |       | SI23 | <p>Green Blue Roofs</p> <p>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 &amp; Blue Roof Guide (2021) which is summarised in Appendix 11.</p>  | Green and blue roofs are provided for the development. Please refer to DBFL Consulting Engineers Engineering Services Report (Section 3) for details. A 70% provision of extensive green roof has been provided for the site. The design proposes for 1,775m <sup>2</sup> of Blue roof and 2,098m <sup>2</sup> Green roof on the total roof area, with an additional Blue roof system of 2,338m <sup>2</sup> provided for at podium level. |
|  |       | SI24 | <p>Control of Paving of Private Driveways / Vehicular Entrances / Grassed Areas</p> <p>To require that all surface water run-off from new / extended domestic driveways, repaired/ replacement driveways, and vehicular entrances (where such development is not exempted from the requirement to obtain planning permission), is managed through the use of SuDS, ensuring no increase in surface water discharges to the public drainage network (for further guidance, please refer to Appendices 5 and 12).</p>   | The proposed SUDS strategy includes provision of permeable paving.   |
|  |       | SI25 | Surface Water Management  | Please refer to the submitted Engineering Services Report (Section 3, Surface Water) which details surface water management proposals.   |

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|  |       |      | 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   |  |
|  |       | SI26 | <p>Taking in Charge of Private Drainage Infrastructure</p> <p>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).</p> | Private drainage (within the site) and public drainage (surface water outfall) are designed / detailed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works. Refer to DBFL Engineering Drawings and Reports  |
|  | 9.5.5 | SI27 | <p>Sustainable Waste Management</p> <p>To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. To support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).</p>              | This application is accompanied by an EIAR and contained as appendices to Chapter 13 of same are (a) a Construction & Demolition Waste Management Plan and (b) an Operational Waste Management Plan, both prepared by AWN Consulting – please refer to same.   |
|  |       | SI28 | <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>  | Please refer to the enclosed Operational Waste Management Plan prepared by AWN Consulting – Appendix 13.2 of Chapter 13 of the submitted EIAR.   |
|  |       | SI29 | <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>  | The site layout provides designated bin storage areas located at basement and ground level. It is envisaged that the bins from the development will be brought to a collection point in at surface level, or directly from the ground level Waste Storage Areas by the waste contractor or facilities management, immediately prior to collection. Residents will be required to take their segregated waste materials to their designated Waste Storage Areas and deposit their segregated waste into the appropriate bins. |
|  |       | SI30 | <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>   | Please refer to the enclosed Operational Waste Management Plan prepared by AWN Consulting (contained in Appendix 13.2 of Chapter 13 of the submitted EIAR) which has been prepared with due consideration of best practice standards and all relevant guidance documents, including the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023.   |

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|  |       | SI016 | <p>Eastern-Midlands Region Waste Management Plan</p> <p>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.</p>  | <p>Please refer to the enclosed Operational Waste Management Plan prepared by Awn Consulting (contained in Appendix 13.2 of Chapter 13 of the submitted EIAR) which has been prepared in accordance with current legal and industry standards including Eastern Midlands Regional Waste Management Plan 2015–2021.</p>                          |
|  |       | SI38  | <p>Noise Sensitive Development</p> <p>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).</p>   | <p>Sound insulation will be provided within the development where required.</p>   |
|  | 9.5.9 | SI41  | <p>Lighting Standards</p> <p>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</p> | <p>This LRD application is accompanied by a public lighting scheme that has been designed in accordance with the relevant guidance set out in European Lighting Standards IS EN 13201 and the DAC consultant from TGD Part M or BS8300.</p>   |
|  |       | SI42  | <p>Light Pollution</p> <p>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</p>  | <p>This LRD application is accompanied by a public lighting scheme that has regard to the minimization of light spillage.</p>   |
|  |       | 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>   | <p>This application is accompanied by a public lighting scheme that ensures that all public and external areas are appropriately and safely lit, and the lighting specification will be selected for an energy efficient development. Final lighting specification and control should be selected to maintain an energy efficient approach.</p> |
|  |       | SI46  | <p>Open Access / Operator Neutral Host Connectivity</p> <p>To require all new developments to provide open access connectivity arrangements directly to the individual premises to enable service provider competition and consumer choice.</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>   |

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|  |        | 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 Applicant notes this and will take it into account should it need to seek planning permission in the future for telecommunication antennae and support structures.   |
|  |        | 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>   | All services will 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>  | Given the brownfield nature of the site, the proposed development will support the green infrastructure of the city, by providing new planting, landscaped 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 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.</p>  | The proposed development will contribute to providing an interconnected green infrastructure network in the city by creating a new green spaces at the site, which is a vast improvement from the current hardstanding nature of the site, and providing a development which includes open spaces and green/blue roofs.  |
|  |        | GI3  | <p>Multi-functionality (GI)</p> <p>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.</p>  | <p>The proposed development will create new green spaces on the site, which is an improvement from its current hard standing condition, to include tree planting, various types of shrub planting and green spaces throughout the site, as well as green/blue 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.</p> |

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|  |        | GI4  | <p>Accessibility</p> <p>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.</p>   | Please refer to the submitted Universal Access Strategy, with the proposed landscape strategy ensuring that landscaped areas are accessible to all.   |
|  |        | GI5  | <p>Greening of Public Realm / Streets</p> <p>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.</p> | SuDs and nature based solutions have been incorporated into the project design via the provision of roof gardens and planted areas at ground level, as well as the provision of green / blue roofs. Permeable paving, tree pits, bio-retention areas etc. are also proposed to manage and treat surface water across the site.  |
|  |        | GI6  | <p>New Development / New Growth Areas</p> <p>To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth 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</p>  | The proposed development will create new green spaces on the site, which is an improvement from its current hard standing condition, to include tree planting, various types of shrub planting throughout the site, as well as green/blue roofing. These areas of vegetation will contribute to the overall ecosystem services provision in this built-up urban area, including through storm water control and management and pollinator resource provision. |
|  |        | GI7  | <p>Connecting Greening Elements in Site Design</p> <p>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</p>   | The proposed development will create new green spaces on the site, which is an improvement from its current hard standing condition, to include tree planting, various types of shrub planting and green spaces throughout the site, as well as green/blue roofing, thus creating a new habitat and green infrastructure connectivity at the site through the various areas of green space within and around same.  |
|  |        | GIO1 | <p>Green Roof Guidance Document (2021)</p> <p>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.</p>   | Green / Blue Roofs are provided for the development. Please refer to the submitted DBFL Consulting Engineers Engineering Services Report (Section 3) and relevant drawings. Green / Blue Roof provision is 70% thus exceeding DCC's minimum coverage of 60%.  |
|  | 10.5.2 | GI9  | <p>European Union Natura 2000 Sites</p>  | An Appropriate Assessment Screening Report has been prepared for this LRD application, which has assessed and screened out any potential sources of significant adverse effects to EU sites as a result of the proposed development.  |

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|  |  |      | <p>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).</p>   | <p>The submitted AA Screening Report concludes “that, on the basis of objective information; the possibility <b>may be excluded</b> that the Proposed Development will have a significant effect on the European sites listed below:</p> <ul style="list-style-type: none"> <li>• North Dublin Bay SAC (000206)</li> <li>• South Dublin Bay SAC (001266)</li> <li>• North Bull Island SPA (004006)</li> <li>• North-west Irish Sea SPA (004236)</li> <li>• South Dublin Bay and River Tolka Estuary SPA (004024)</li> </ul> <p>The screening exercise above used the best available scientific knowledge and objective information to assess potential impacts to European sites arising from the project itself or in combination with other plans and projects. Based on this assessment, and in light of these sites’ conservation objectives, the possibility of any likely significant effects on the above listed European sites <b>may be excluded</b>. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process and the preparation of an NIS is not required”.</p> <p>Furthermore, in his assessment of the SHD application under Ref. ABP-310910-21, the An Bord Pleanála Inspector stated: “it is concluded that the proposed development, individually or in-combination with other plans or projects, would not be likely to have a significant effect on North Dublin Bay SAC (000206), North Bull Island SPA (004006), South Dublin Bay and River Tolka Estuary SPA (004024), South Dublin Bay SAC (001266) or any European site, in view of the sites’ Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required”.</p> |
|  |  | GI10 | <p>Flora and Fauna Protected under National and European Legislation Located Outside Designated Areas</p> <p>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 supporting the favourable conservation condition of any European sites</p> | <p>The site is in brownfield condition; however, an Ecological Impact Assessment (EclA) has been undertaken and is submitted as Chapter 5 “Biodiversity” of the submitted EIAR – please refer to same.</p>  |
|  |  | GI11 | <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>The “Biodiversity” chapter of the submitted EIAR has considered the potential impacts to designated sites – please refer to same. Where any potential sources of adverse effects to same as a result of the proposed development were identified, the EIAR details the mitigation measures that will be required to address them. Once these</p>   |



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|  |  |      |   | mitigation measures are followed in full, there will be no likely significant effects on any designated sites as a result of the proposed development.   |
|  |  | GI12 | <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>  | As noted above, the submitted EIAR has considered the potential impacts to designated sites – please refer to same. Where any potential sources of adverse effects to same, as a result of the proposed development were identified, the EIAR 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.   |
|  |  | GI13 | <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 accordance with development standards set out in this plan.</p>  | As noted above, the submitted EIAR has considered the potential impacts to designated sites – please refer to same. Where any potential sources of adverse effects to same, as a result of the proposed development were identified, the EIAR 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.   |
|  |  | GI14 | <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 Appropriate Assessment Screening Report and an EIAR have both been prepared as part of this LRD application. These assessments will consider potential impacts to designated sites, flora, fauna and areas of importance to wildlife and nearby ecological corridors.</p> <p>The proposed development includes the creation of new green spaces on the site, which is an improvement from its current hard standing condition, to include tree planting, various types of shrub planting throughout the site, which will an increase in areas of tree cover, and shrub planting. This will ensure the site contributes to the overall provision of green infrastructure within the area.</p> |
|  |  | GI15 | <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>   | The proposed development is not located along any waterbodies. The proximity of the site to the Santry River, Tolka Estuary and Dublin Bay has been assessed in the enclosed Appropriate Assessment Screening Report. Furthermore, the submitted EIAR has assessed the potential for impacts to aquatic species as a result of the proposed development – please refer to the aforementioned submitted reports for details.  |

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|  |  | GI16 | <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 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</p> | <p>The submitted Appropriate Assessment Screening Report and EIAR set out relevant mitigation measures for the proposed development.</p> <p>A Biodiversity Management Plan (BMP) has been prepared for the proposed development and details how it will support local biodiversity into the future</p>  |
|  |  | GI17 | <p>Habitat Restoration</p> <p>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</p>  | <p>A Biodiversity Management Plan (BMP) has been prepared for the proposed development and details how it will support local biodiversity into the future.</p> <p>The proposed development's landscaping provides for increased tree, shrub and other planting to replace any vegetation lost at the site and provide for an overall net gain in planting and vegetation on the site from its current hardstanding condition.</p>   |
|  |  | GI18 | <p>Minimise Impact – Light and Noise</p> <p>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 &amp; External Lighting).</p>   | <p>Bat friendly lighting will be incorporated into the design, and where necessary / as required, a dark corridor / buffer zone for bats may be provided. As part of the public lighting proposals and EIAR recommendations/mitigation measures, the appropriate proposals will be incorporated into the design of the proposed development.</p>  |
|  |  | GIO7 | <p>National Biodiversity Action Plan 2017-2021</p> <p>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.</p>  | <p>The proposed development will continue to provide and support biodiversity at the site, and it is not considered that the proposed development will impact on any designated sites.</p>  |
|  |  | GIO8 | <p>Dublin City Biodiversity Action Plan 2021 - 2025</p> <p>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 conservation and restoration and measurable targets and actions, in partnership with all relevant stakeholders</p>   | <p>The proposed development will continue to provide and support biodiversity at the site through the inclusion of semi-natural habitats and resources for local flora and fauna.</p>   |
|  |  | GIO9 | <p>Invasive Alien Species</p> <p>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</p>  | <p>The submitted EIAR states that: <i>"The Site was assessed for the presence of invasive plant species during the habitat surveys undertaken on the 13<sup>th</sup> of May 2021 and 14<sup>th</sup> of February 2024. No high impact invasive plant species were recorded at the Site during the walk over surveys carried out on the 13<sup>th</sup> of May 2021 or the 14<sup>th</sup> of February 2024. Three non-native, potentially invasive species were found along the western fence line within the Site boundary, a single Butterfly-bush Buddleja davidii, a number</i></p> |

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|  |        |       | the Dublin City Invasive Alien Species Action Plan 2016 – 2020 (or as updated).   | <p><i>of Sycamore Acer pseudoplatanus saplings and Cotoneaster Cotoneaster spp. None of these species are listed under regulation S.I. 477.</i></p> <p><i>Although not considered to be 'high impact' invasive species or listed under regulation S.I. 477, the non-native species recorded at the Site, Butterfly-bush, Sycamore saplings and Cotoneaster should be controlled/removed as per the appropriate best-practice guidelines. Removal and disposal should be carried out in accordance with appropriate guidelines such as TII (formerly NRA) Guidelines on The Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads (2010), with consideration given to the prevention of spread of these plants”.</i></p> |
|  |        | GIO10 | <p>All Ireland Pollinator Plan 2021 - 2025</p> <p>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</p>           | The All-Ireland Pollinator Plan 2021 – 2025 will be considered as part of the landscaping proposals.  |
|  |        | GIO13 | <p>Dublin City Habitat Map and Database</p> <p>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</p>   | The proposed development will create new green spaces on the site, which is an improvement from its current hard standing condition, to include tree planting, various types of shrub planting throughout the site, which will an increase in areas of tree cover, and shrub planting which will ensure that habitat connectivity will be enhanced and maintained on the site.  |
|  | 10.5.3 | GI19  | <p>Protect and Enhance Landscapes</p> <p>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.</p> | The proposed development will ensure the site will provide an impressive semi-natural landscape for residents and locals, through the creation of a new green spaces and planting thus providing biodiversity enhancement therein.  |
|  |        | GI20  | <p>Views and Prospects</p> <p>To protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage.</p>  | A Landscape Visual Impact Assessment has been undertaken, the details of which are set out Chapter 15 “The Landscape” of the submitted EIAR – please refer to same.   |
|  | 10.5.4 | GI24  | Multi-Functionality (GI)  | The proposed development will provide a variety of planting and habitat typologies, at both ground and upper floor levels, as well as green / blue roofing.   |

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|  |        |      | 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).  | Open spaces will provide leisure and amenity space to residents and locals, as well as areas managed for biodiversity e.g., pollinators, birds and bats.   |
|  |        | GI25 | Open Space Provision (sq. m.) per 1,000 Persons Benchmark<br><br>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. | This LRD application is accompanied by a Universal Access Strategy, with the proposed landscape strategy ensuring that landscaped areas are accessible to all.   |
|  |        | GI28 | New Residential Development<br><br>To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.   | The scheme includes accessible public open spaces including children's play space, which is considered to be an amenity for the local area.  |
|  | 10.5.7 | GI40 | Tree Planting - General<br><br>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 in the interests of natural heritage, amenity, environmental quality and climate resilience                        | Tree enhancement has been a key tenet of the proposed design. Proposed tree planting will have a greater long-term benefit to local ecology and biodiversity. Pollinator friendly planting will be provided, including wildflower meadow, native trees and shrubs. Newly planted trees will be able to grow with vigour appropriate to the species and situation, in good health, to achieve the desired planting objectives.  |
|  |        | GI41 | Protect Existing Trees as Part of New Development<br><br>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.  | Details of tree protection measures are provided by project Arborist "The Tree File" including an arboricultural report / assessment, Tree Constraints & Tree Protection Plans. The trees that will be removed will be replaced by a significant number of new trees that will have a greater long-term benefit to local ecology and biodiversity. The aforementioned arboricultural details are submitted as part of this LRD application - , but the submitted landscaping plans illustrate the retained and proposed tree - please refer to same. |
|  |        | GI42 | Tree Management<br>To adopt a pro-active and systematic good practice approach to tree management with the aim of promoting good tree health, condition, diversity, public amenity and a balanced age-profile and as per Dublin City Tree Strategy 2016.   | Tree management proposals for retained trees during construction are outlined within the Arboricultural Assessment, & Tree Protection Plan.  |

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|  |        | GI43  | <p>Hedgerows</p> <p>To protect and enhance the City's hedgerow network, in particular, hedgerows that form townland, parish and barony boundaries. It is Council policy to increase hedgerow coverage and promote the planting of hedgerows in new developments using native species</p>   | <p>Given the brownfield nature of the site, there are no significant hedgerows on the site. Existing trees along the western boundary are to be retained with this area planted that will provide habitat for mammals and breeding birds. Measures to be implemented will ensure that biodiversity is not compromised, including lighting designed to accommodate any bats that may be commuting and foraging in the area.</p> |
|  |        | GI44  | <p>Resilient Urban Forest</p> <p>To deliver and manage a resilient urban forest for the City to help increase resilience to the effects of climate change to consist of native and exotic trees and to target and prioritise locations in the city with a low canopy cover for an increased level of tree cover.</p>                           | <p>Diversity of new tree population within site is reflected in landscape architecture proposals – refer to the submitted landscape plan (drawing no. 03-DR-2001) by Dermot Foley Landscape Architecture.</p>  |
|  |        | GIO41 | <p>Dublin City Tree Strategy 2016</p> <p>To support the implementation of the Dublin City Tree Strategy 2016 and any future revision thereof, which sets a vision for the long-term planting, protection and maintenance of trees, hedgerows and woodlands within Dublin City.</p>   | <p>This is supported by the retention of existing trees and new tree plantings as outlined by landscape architects.</p>  |
|  |        | GIO42 | <p>Trees as Wildlife Corridor or 'Stepping Stones'</p> <p>To protect trees, hedgerows or groups of trees which function as wildlife corridors or 'stepping stones' in accordance with Article 10 of the EU Habitats Directive.</p>   | <p>This is supported by the retention of existing trees where possible, and proposed planting which will contribute to the creation of a green infrastructure corridor.</p>  |
|  | 10.5.8 | GI45  | <p>National Physical Activity Plan 2016</p> <p>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.</p> | <p>The proposed development includes open spaces which will contribute towards improving the health and well-being of the community.</p>   |
|  |        | GI51  | <p>Children's Playing Facilities - General</p> <p>To seek the provision of children's playing facilities that encompasses local and public places and spaces for play that are accessible and inclusive for children and young people of all ages, abilities and socio-economic backgrounds</p>  | <p>The proposed children's play spaces will be accessible and inclusive for all and are appropriately located within the site.</p>   |
|  |        | GI52  | <p>Children's Playing facilities in New Residential and Mixed Developments</p>   | <p>The overall design aspiration for the scheme is to make the public spaces child friendly through the provision of well located and well designed spaces that are accessible.</p>  |

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|   |        |      | 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  | Pedestrian priority is a key driver in the design and there are informal opportunities for 'playable' and 'social' space throughout the development.   |
| Chapter 11 – Built Heritage and Archaeology | 11.5.1 | BHA2 | <p>Development of Protected Structures</p> <p>That development will conserve and enhance protected structures and their curtilage and will:</p> <ul style="list-style-type: none"> <li>(a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.</li> <li>(b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.</li> <li>(c) Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation.</li> <li>(d) Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.</li> <li>(c) Ensure that the form and structural integrity of the protected structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the protected structure.</li> <li>(d) Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.</li> <li>(e) Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the protected structure.</li> <li>(f) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.</li> <li>(g) Ensure historic landscapes, gardens and trees (in good condition) associated with protected structures are protected from inappropriate development.</li> <li>(h) Have regard to ecological considerations for example, protection of species such as bats.</li> </ul> | <p>As part of the current SHD application, the DCC Conservation Officer requested that the applicant set out the history, architecture and identify all significant features of the existing building, based upon the historic industrial nature of Santry. In addition, as part of the LRD Opinion issued (Ref. LRD6044/23-S2) for the current proposal, an Architectural Heritage Impact Assessment (AHIA) has been prepared detailing the history of the building and providing details of the construction and condition of the building, including photographs – please refer to the enclosed AHIA, prepared by Dermot Nola, Conservation Architect for details.</p> <p>The submitted AHIA asserts that <i>“There are Protected Structures, and entries in the National Inventory of Architectural Heritage, in the vicinity of the site, notably to the east of Swords Road. These, however, are apparently not considered to be unduly impacted by the proposed development”</i>.</p> |



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|  |        | BHA6 | <p>Buildings on Historic Maps</p> <p>That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report this it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).</p>  | <p>All of the structures on the subject site are proposed to be demolished but none are of any conservation or architectural merit. Please refer to the submitted AHIA for more details.</p> |
|  | 11.5.2 | BHA7 | <p>Architectural Conservation Areas</p> <p>(a) To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area, and its setting wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.</p> <p>(b) Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA.</p> <p>(c) Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.</p> <p>(d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.</p> <p>(e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.</p> <p>(f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised</p> | <p>The subject site is not located within an Architectural Conservation Area (ACA), and there are no Architectural Conservation Areas within the vicinity of the site.</p>                   |

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|  |        |      | <p>conservation expertise, for works to buildings of historic significance within ACAs.</p> <p>All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access, or requires removal to protect other specimens from disease.</p>  |   |
|  | 11.5.3 | BHA9 | <p>Conservation Areas</p> <p>To protect the special interest and character of all Dublin's Conservation Areas – identified under Z8 and Z2 zoning objectives and denoted by red line conservation hatching on the zoning maps. Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.</p> <p>Enhancement opportunities may include:</p> <ol style="list-style-type: none"> <li>1. Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting.</li> <li>2. Re-instatement of missing architectural detail or important features.</li> <li>3. Improvement of open spaces and the wider public realm and reinstatement of historic routes and characteristic plot patterns.</li> <li>4. Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area.</li> <li>5. The repair and retention of shop and pub fronts of architectural interest.</li> <li>6. Retention of buildings and features that contribute to the overall character and integrity of the Conservation Area.</li> <li>7. The return of buildings to residential use.</li> </ol> <p>Changes of use will be acceptable where in compliance with the zoning objectives and where they make a positive contribution to the character, function and appearance of the Conservation Area and its setting. The Council will consider the contribution of existing uses to the special interest of an area when assessing change of use applications, and will promote compatible uses which ensure future long-term viability.</p> | <p>The subject site is not located within an identified conservation area or an architectural conservation area. The site is zoned objective Z3 and not objectives Z2 and Z8.</p> |

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|  |        | BHA11 | <p>Rehabilitation and Reuse of Existing Older Buildings</p> <p>(a) To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment</p> <p>(b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.</p> <p>(c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.</p>  | <p>There are no Protected Structures on site, and all buildings on site are to be demolished.</p> <p>We note that the previous planning refusal reasons did not specifically object to the principle of demolition of these buildings.</p>   |
|  |        | BHA15 | <p>Twentieth Century Buildings and Structures</p> <p>(a) To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.</p> <p>(b) To encourage the retention and reinstatement of internal and external features, that contribute to the character of exemplar twentieth century buildings, such as roofscapes, boundary treatments, fenestration pattern, materials, and other features, fixtures and fittings (including furniture and art work), considered worthy of retention</p>   | <p>Twentieth century buildings occupy the subject development site, however none are Protected Structures and none are listed on the NIAH. Based upon this, it is put forward that the proposed demolition is deemed necessary to deliver the development.</p>   |
|  | 11.5.5 | BHA26 | <p>Archaeological Heritage</p> <p>1. To protect and preserve Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994 which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (<a href="http://www.archaeology.ie">www.archaeology.ie</a>) and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.</p> <p>2. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Monuments and Places listed on the statutory Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994.</p> <p>3. To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments</p> | <p>Please refer to Chapter 13 "Archaeology &amp; Cultural Heritage" of the submitted EIAR, which states that the development will not impact directly or indirectly upon any previously recorded site or monument listed in the RMP or the RPS. The eastern part of the site has a moderate archaeological potential. No archaeological remains were identified in the monitoring works for the site to the south in 2019. Potential significant impact on previously unidentified subsurface archaeological remains that may survive on the site.</p> <p>We note that in his assessment of the SHD submitted under Ref. ABP-310910-21, the An Bord Pleanála Inspector stated the following in relation to the aforementioned EIAR chapter on archaeology and cultural heritage: <i>"I have considered all of the application documentation and submissions received, and I am satisfied that the impacts predicted to arise in relation to Archaeology and Cultural Heritage would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied</i></p> |

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|  |  |        | <p>included in the Record of Monuments and Places; all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.</p> <p>4. Development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.</p> <p>5. To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.</p> <p>6. Preserve the character, setting, and amenity of upstanding and below ground town wall defences.</p> <p>7. Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land, shall have regard to the Shipwreck Inventory maintained by the Department of Housing, Local Government and Heritage and be subject to an appropriate level of archaeological assessment.</p> <p>8. To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.</p> | <p><i>that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Archaeology and Cultural Heritage”.</i></p>  |
|  |  | BHAO19 | <p>Built Heritage and Archaeology</p> <p>To provide for the protection, preservation and promotion of built heritage, including architectural heritage, archaeological heritage and underwater heritage, and support the in situ presentation and interpretation of archaeological finds within new developments</p>  | <p>The enclosed EIAR sets out the following recommendations:</p> <p>In the event of a grant of planning permission it is recommended that the removal of the concrete slab be monitored under licence and, after the demolition of the existing structure, a programme of archaeological testing be carried out across the site prior to any further groundworks on site.</p> <p>Time should be allowed between the monitoring works and any construction or service laying in case archaeological features are uncovered.</p> <p>These recommendations have been made in consultation with the Archaeology, Conservation &amp; Heritage Department of Dublin City Council.</p> |

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|                      |        |      |   | A report on the results of the monitoring programme should be submitted to the City Archaeologist and the National Monuments Service following the completion of the works. All recommendations are subject to the approval of the City Archaeologist and the National Monuments Service.  |
| Chapter 12 – Culture | 12.5   | CU1  | Shared Vision for Culture<br>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.   | It is proposed that the ground floors of Blocks C-D and E-F will provide culture/arts/community space within the development. The applicant can agree an end user with Dublin City Council through compliance. The submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area. |
|                      |        | CU2  | Cultural Infrastructure<br><br>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  | The provision of culture/arts/community space in the scheme will contribute towards achieving this policy. The applicant can agree an end user with Dublin City Council through compliance. The submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area.                    |
|                      | 12.5.1 | CU4  | Cultural Resources<br><br>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  | The provision of culture/arts/community space in the scheme will contribute towards achieving this policy. The applicant can agree an end user with Dublin City Council through compliance. The submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area.                    |
|                      | 12.5.2 | CU7  | Cultural Clusters and Hubs<br><br>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. | The provision of culture/arts/community space in the scheme will contribute towards achieving this policy. The applicant can agree an end user with Dublin City Council through compliance. The submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area.                    |
|                      | 12.5.3 | CU12 | Cultural Spaces and Facilities<br><br>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.  | The provision of culture/arts/community space in the scheme will contribute towards achieving this policy. The applicant can agree an end user with Dublin City Council through compliance. The submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area.                    |
|                      |        | CU17 | Design of Cultural and Arts Facilities<br><br>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 final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance, however, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area.   |

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|  |        | CUO25 | <p>SDRAs and Large Scale Developments</p> <p>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.</p> <p>*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.</p> | <p>The proposed development is over 10,000 sq m and provides over 5% community, arts, and cultural spaces. In compliance with CUO25, it is proposed that the ground floors of Blocks C-D and E-F (i.e. c. 1,460sq.m of floor space) is intended to be used as community/arts &amp; culture space.</p>   |
|  |        | CUO30 | <p>Co-Design and Audits</p> <p>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 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</p>  | <p>A Cultural Infrastructure (Impact) Assessment is submitted as part of this LRD application – please refer to same.</p>   |
|  | 12.5.4 | CUO31 | <p>Artist Workspaces</p> <p>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.</p>   | <p>The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans.</p>       |
|  |        | CU18  | <p>Music as a Key Cultural Asset</p> <p>To support music as a key cultural asset of Dublin City and seek the retention and expansion of venues and facilities that allow for expression and</p>  | <p>It is envisaged that the proposed community/arts &amp; culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact</p> |



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|  |  |       | experience of music in a wide variety of forms to enhance the cultural life of the city.  | Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans.  |
|  |  | CUO33 | <p>Music Rehearsal Spaces</p> <p>To seek opportunities to include facilities for music rehearsal spaces within communities to enable and encourage more people to engage with music, with a particular focus on young people.</p>   | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  |  | CUO35 | <p>Music Venues</p> <p>To encourage the development of new music and dance venues at accessible locations that will provide opportunities for music artists to perform and spaces for people to experience music at a range of venue sizes.</p>   | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  |  | CU19  | <p>Audio-Visual Sector</p> <p>Support the growth of the audio-visual sector within Dublin and to promote Dublin as a location for film and series production to provide employment opportunities, showcase the city and provide new artistic opportunities to all within the city</p>   | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  |  | CUO36 | <p>Audio-Visual Sector</p> <p>To support the growth of the audio-visual sector within the city, and the continued growth of the existing clusters in Dublin 8 and Dublin 2 and the emerging cluster in Dublin 7, including encouraging start-up space provision.</p>  | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  |  | CUO37 | <p>Audio and Visual Community Spaces</p> <p>To work with local stakeholders to seek the delivery of audio and visual community spaces such as community radio studios and recording spaces across the city suburbs and where the opportunity arises. To seek to integrate provision for cinema events space within urban villages by ensuring that the design of future community facilities can accommodate cinema events.</p> | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  |  | CU20  | <p>Cultural Activities in the Evening</p> <p>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.</p>   | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |

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|  |        | CU22  | <p>Range of Cultural and Amenity Options</p> <p>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</p>                         | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  |        | CU23  | <p>Performance and Entertainment Spaces</p> <p>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.</p>   | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  |        | CUO41 | <p>Music and Dance</p> <p>To recognise the cultural value of a thriving club and dance scene for all music types and audiences to the City and to the night time economy; and to support and protect existing club venues and the future growth and development of such facilities as a distinct part of the cultural life of the City.</p>                                | It is envisaged that the proposed community/arts & culture space end user(s) will be developed in conjunction with Dublin City Council through compliance. The final layout of the community/arts/cultural space will be developed in conjunction with Dublin City Council through compliance. However, the submitted Cultural Infrastructure Impact Assessment (CIA) outlines potential end users based upon an examination of need in the area and this is illustrated in the submitted ground floor plans. |
|  | 12.5.5 | CU24  | <p>Civic Arts and Cultural Spaces in Urban Villages</p> <p>To seek to deliver new civic arts and cultural spaces in urban villages across the city in areas where there is a deficit and to prioritise such areas for investment</p>   | The provision of culture/arts/community space in the scheme will contribute towards achieving this policy.  |
|  |        | CUO45 | <p>Buildings within Communities for Arts and Cultural Spaces</p> <p>To seek to acquire buildings of merit within communities that can become important arts and cultural spaces; and give a new purpose to local buildings with heritage value and to promote the expansion of cultural uses within existing spaces, particularly within buildings in public ownership</p> | The provision of culture/arts/community space in the scheme will contribute towards achieving this policy.  |
|  |        | CUO47 | <p>Accessibility</p> <p>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</p>   | The proposed development and outdoor spaces are universally accessible. A Universal Access Statement is submitted as part of this LRD application.  |
|  | 12.5.6 | CUO54 | <p>Naming of New developments</p> <p>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;</p>   | Upon a grant of permission, such details will be agreed at compliance stage with Dublin City Council  |

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|                                    |        |        | 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   |  |
|                                    | 12.5.7 | CU29   | Public Realm for Cultural Events<br><br>To encourage greater use of the public realm for cultural events to make the inner city and urban villages more attractive to those with young families for both day and night time events, and to seek provision of new public spaces for outdoor performance that are designed and fitted to host a range of events   | The ground floors of Blocks C-D and E-F will provide culture/arts/community space within the development. In addition, the proposed outdoor spaces may encourage use of the public realm for cultural events.  |
|                                    |        | CU30   | Life Worth Living Taskforce<br><br>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 provision of culture/arts/community space in the scheme will contribute towards achieving this policy.   |
|                                    |        | CUO58  | Public Art<br><br>All large scale regeneration schemes, whether lodged for planning as a single or multiple applications; where the total scale of regeneration exceeds 25,000 sq. m. shall be required to include an element of public art   | Upon a grant of permission, such details will be agreed at compliance stage with Dublin City Council   |
| Chapter 15 – Development Standards |        | 15.3.1 | To facilitate the proper assessment of a development proposal in circumstances where it is considered that a proposed development would be likely to have a significant effect on the environment, due to the nature, scale or location of the proposal, Dublin City Council will require the submission of an Environmental Impact Statement in accordance with the provisions of the Planning and Development Regulations 2001, as amended. | An Environmental Impact Assessment Report (EIAR) is included as part of this LRD application. The proposed development is below the threshold for a mandatory Environmental Impact Assessment Report (EIAR), however, given the planning history attached to the site and the cumulative development in the environs, an EIAR of the proposed development has been undertaken and is submitted as part of this LRD planning application. |
|                                    |        | 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 has prepared the submitted Appropriate Assessment Screening Report for the proposed development. A Stage 2 assessment was not deemed necessary.   |
|                                    |        | 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  | Enviroguide Consulting has prepared an Ecological Impact Assessment for the proposed development which is set out under Chapter 5 “Biodiversity” of the submitted EIAR – please refer to same.   |

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|  |  | 15.4.1 | <p>Healthy Placemaking</p> <p>Key principles to consider are:</p> <ul style="list-style-type: none"> <li>▪ The contribution to the public realm for the benefit and / or enjoyment of the locality.</li> <li>▪ 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.</li> <li>▪ The use of high quality materials and finishes including hard and soft landscaping.</li> <li>▪ The orientation of open space and the accessibility to daylight and sunlight.</li> <li>▪ 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.</li> <li>▪ The accessibility of the development and the traffic calming measures in place in accordance with DMURS.</li> <li>▪ The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc.</li> <li>▪ 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.</li> </ul> | <p>Healthy placemaking principles have been embedded into the design of the proposed development, the details of which are set out in the submitted Architectural Design Statement, landscaping proposals, daylight/sunlight assessment – please refer to same for further details.</p> |
|  |  | 15.4.2 | <p>Architectural Design Quality</p> <p>Key principles to consider are:</p> <ul style="list-style-type: none"> <li>▪ The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site.</li> <li>▪ 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.</li> <li>▪ The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting.</li> <li>▪ The suitability of the proposed design to its intended land use and the wider land-use character of the area, along with its relationship with and contribution to the public realm.</li> <li>▪ The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River</li> </ul>   | <p>The proposed development is of a high architectural design quality and has a character that relates to the existing context. Please refer to the submitted Architectural Design Statement for details.</p>   |

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|  |  |        | <p>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.</p> <ul style="list-style-type: none"> <li>▪ The need to protect and enhance natural features of the site, including trees and any landscape setting.</li> <li>▪ The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling.</li> <li>▪ 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.</li> </ul> <p>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</p>  |  |
|  |  | 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"> <li>▪ Buildings should be designed to minimise resource consumption, reduce waste, conserve water, promote efficient energy use and use appropriate renewable technologies.</li> <li>▪ Design should optimise natural or heat recovery ventilation, minimise overshadowing and minimise glare and excessive solar gain.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> | <p>The proposed development embeds sustainability design principles. Details are provided in the submitted Architectural Design Statement and Climate Action, Energy &amp; Sustainability Report – please refer to both.</p> |

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|  |  |        | <ul style="list-style-type: none"> <li>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.</li> </ul> <p>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.</p>   |   |
|  |  | 15.4.4 | <p>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</p>   | <p>The proposed development and the external road works have been designed in accordance with DMURS. The appropriate number of mobility impaired car parking have been provided, and a Quality Audit and Universal Access Statement are submitted as part of this LRD application – please refer to same.</p>   |
|  |  |        | <p>Dublin City Council will have regard to the Universal Design Guidelines for Homes in Ireland issued by the National Disability Authority and Housing Options for our Ageing Population, issued by the Department of Housing, Local Government and Heritage and the Department of Health, the National Disability Authority's Building For Everyone: A Universal Design Approach 2012 and will seek to encourage the implementation of best practice standards with regard to access in relation to both indoor and outdoor environments. 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.</p> | <p>The proposed development is designed to comply with TGD Part M and a minimum of 50% of the larger than minimum sized units are designed having regard to the relevant Universal Design Guidelines.</p>   |
|  |  | 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>  | <p>Section 5.7 of this Statement of Consistency provides a response to the relevant principles of the Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007). Please also refer to the submitted Architectural Design Statement and Community Safety Strategy for more details.</p> |



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|  |  |      | <ul style="list-style-type: none"> <li>▪ Maximising passive surveillance of streets, open spaces, play areas and surface parking.</li> <li>▪ Avoiding the creation of blank facades, dark or secluded areas or enclosed public areas.</li> <li>▪ Eliminating leftover pockets of land with no clear purpose.</li> <li>▪ Providing adequate lighting.</li> <li>▪ Providing a clear distinction between private and communal or public open space, including robust boundary treatment.</li> <li>▪ 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.</li> <li>▪ Locating back gardens next to other back gardens or secure private areas rather than on to roadways or other public areas.</li> <li>▪ Ensuring that the layout and design of roads within residential areas encourages appropriate traffic volumes and speeds.</li> <li>▪ 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.</li> <li>▪ Using materials in public areas which are sufficiently robust to discourage vandalism.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p>On housing developments over 100 units, the Council will require the submission of a Community Safety Strategy (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.</p> |   |
|  |  | 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</p>   | <p>The proposed design has considered its appropriateness at a city scale. Previous versions of the early stages of design and other alternatives for the development of the subject site are detailed in the submitted Architectural Design Statement and Planning Statement – please refer to same.</p> |

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|  |  |        | encouraged to utilise early iterations of the design statement in pre planning consultations with the Planning authority.   | As part of the enclosed EIAR, the alternatives examined are detailed – refer to Chapter 3.  |
|  |  | 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"> <li>▪ To encourage innovative, high quality urban design and architectural detail in all new development proposals</li> <li>▪ To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.</li> <li>▪ To respect and enhance existing natural features of interest.</li> <li>▪ To contribute to the streetscape creating active and vibrant public realm.</li> <li>▪ To create animation and create activity at street level and vertically throughout the building.</li> <li>▪ To provide for appropriate materials and finishes in the context of the surrounding buildings.</li> <li>▪ To ensure land contamination is appropriately dealt with and mitigated against.</li> <li>▪ To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.</li> <li>▪ To create new compositions and points of interest.</li> <li>▪ 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.</li> <li>▪ To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.</li> <li>▪ 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.</li> <li>▪ To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.</li> <li>▪ Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid</li> </ul> | <p>The proposed development is a large-scale development and has been designed to incorporate the measures set out in Section 15.5.1 of the CDP as set out throughout the application documentation especially the submitted Architectural Design Statement &amp; Planning Statement.</p> |

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|  |  | 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 as part of the planning application. As such, Dublin City Council will require developments:</p> <ul style="list-style-type: none"> <li>▪ To ensure materials and finishes complement the existing pallet of materials in the surrounding area.</li> <li>▪ Promote durability to ensure a good visual appearance over time.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> | <p>The materials and finishes are selected to ensure longevity for the lifetime of the development. Please refer to the submitted Architectural Design Statement for details.</p>   |
|  |  | 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). 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.</p>   | <p>A detailed Architectural Design Statement is included with this submission – please refer to same.</p>   |
|  |  | 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>A Energy Report is submitted as part of this LRD application which details how the scheme will meet the requirements of Part L and NZEB compliance.</p> <p>The proposed development introduces new open spaces and green roofs which will benefit the green infrastructure in Dublin City.</p> |

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|  |  |        | <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"> <li>▪ Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> | <p>The proposed development incorporates existing planting and integrates existing natural features.</p> <p>The open spaces will form part of the green infrastructure network in this part of Dublin. The Dublin City Biodiversity Action Plan 2021 – 2025 has been considered as part of the scheme proposals.</p> |
|  |  | 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>Surface Water Management for the development is incorporated into the Engineering Services Report by DBFL Consulting Engineers – refer to section 3 of same.</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>   | <p>Green / Blue Roofs provided for the development. Please refer to DBFL Consulting Engineers Engineering Services Report (Section 3.3.9) and relevant drawings. Green / Blue Roof provision exceeds DCC's minimum coverage by providing 70%.</p>  |

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|  |  | 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>  | <p>The development includes tree planting, a large quantum of public and communal open spaces and green roofs in accordance with Section 15.6.5. Please refer to the submitted landscaping &amp; engineering proposals for details.</p>  |
|  |  | 15.6.6 | <p>Sensitive Ecological Areas</p> <p>Sensitive ecological areas can include protected areas such as SPA's, SAC's and NHA's as well as areas with significant tree cover and vegetation capable of facilitating habitats, or any other landscaped area with quality natural environment or sensitive natural features. Regard to such areas must be made in any development proposal.</p> <p>Where a proposed development adjoins a sensitive ecological area such as a river or canal bank, the area adjacent to the waterway should be retained as a riparian corridor with linkages into the wider open space network. The maintenance of natural river banks shall be required, without physical or visual encroachment on watercourses. See also policy SI10.</p> <p>The width of any linear park adjacent to a waterway should take into account the natural topography, existing layout and amenity potential with due allowance for riparian corridors and flood risk. In all cases, any existing blockages to permeability, such as boundaries or redundant buildings, should be resolved where possible. See Chapter 9, Section 9.5.2 and also policies SI10, SI11 and SI12, and objectives SIO7 and SIO8 on River Restoration.</p> <p>Full public access to lands along waterways which are in private ownership as part of any development proposal should be provided unless exceptional circumstances prevail.</p> <p>All of the main rivers in Dublin city have salmonid populations. Therefore, applicants should also demonstrate legal compliance to protect the watercourses and fisheries from soil, silt or other material during construction and in this regard should liaise with Inland Fisheries Ireland. As many protected species inhabit Dublin's rivers, applicants should consult with the National Parks and Wildlife Service to inquire as to any consent procedures required for proposed works and to ensure that design layouts do not cause habitat loss. In the case of proposals adjacent to a canal, appropriate space should be retained for wildlife and it should also be ensured that wildlife have appropriate access to the water.</p> <p>Applicants should consult the Dublin City Council Biodiversity Action Plan 2021-2025 and the Dublin City Canals Plan (Waterways Ireland in conjunction</p> | <p>The site does not adjoin a river or canal bank.</p> <p>Enviroguide Consulting has prepared an Appropriate Assessment Screening Report for the proposed development. A Stage 2 assessment was not deemed necessary.</p> <p>In addition, Enviroguide Consulting has also prepared an Ecological impact Assessment under the Biodiversity chapter of the enclosed EIAR which includes an assessment 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 are recommended and detailed within same to address any potential impacts and enhance the biodiversity of the site compared to its current condition. It is considered that where any mitigation measures set out in same 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>The subject site is currently in brownfield condition; however, the proposed development includes the creation of new green spaces and planting which will increase in areas of tree cover, and shrub planting. This will ensure the site enhances biodiversity within the scheme.</p> |

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|  |  |        | with Dublin City Council, Fáilte Ireland and the Dublin Docklands Development Authority) to ascertain the implications of these plans for any such site. Regard should also be had to Planning for Watercourses in the Urban Environment Guidance (2020) produced by Inland Fisheries Ireland.   |   |
|  |  | 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 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> | Proposed hard and soft landscape materials are indicated on the submitted landscape plans and in the Landscape Design Report, as well as in the submitted Architectural Design Statement. As part of the enclosed documentation, a planting specification has been provided outlining maintenance regimes.                                      |
|  |  | 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</p>  | A Landscape Design Rationale report is included as part of this submission which provides details of the proposed public and communal open spaces, boundary treatments, public realm improvements, materials, and the tree and planting strategy. The proposed landscaping details have been coordinated with the engineering & SUDs proposals. |



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|  |  |        | <p>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). Landscape design reports should address the following:</p> <ul style="list-style-type: none"> <li>▪ The protection and incorporation of existing trees and landscape features worthy of retention.</li> <li>▪ The contribution of the proposed development to the landscape character and setting and open space amenity of the area.</li> <li>▪ The value of ecological corridors and habitats surrounding the proposed development and the potential impact on these areas.</li> <li>▪ The relationship between existing green corridors, public open spaces or area of high ecological values.</li> <li>▪ The detail and specifications for materials, finishes and maintenance details.</li> <li>▪ 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.</li> <li>▪ 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).</li> <li>▪ The details of ecosystems services and biodiversity including pollinator friendly approach.</li> <li>▪ The maintenance and management strategy for the landscaped features.</li> </ul> |   |
|  |  | 15.6.9 | <p><b>Trees and Hedgerows</b></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>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 site is in brownfield condition with limited existing planting on site. However, the Arborist's details on what is to be retained on site is incorporated into the proposed landscaping plans. The trees that will be removed will be replaced by trees that will have a greater long-term benefit to local ecology and biodiversity. Pollinator friendly planting will be provided, including wildflower garden, native trees and shrubs.</p> |

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|  |  |         | <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"> <li>▪ Habitat/ecological value of the trees and their condition.</li> <li>▪ Uniqueness/rarity of species.</li> <li>▪ Contribution to any historical setting/ conservation area.</li> <li>▪ Significance of the trees in framing or defining views.</li> <li>▪ Visual and amenity contribution to streetscape.</li> </ul>   |  |
|  |  | 15.6.10 | <p><b>Tree Removal</b></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>   | <p>Details of tree protection measures are provided by project Arborist "The Tree File" including an arboricultural report / assessment, Tree Constraints &amp; Tree Protection Plans. The trees that will be removed will be replaced by a significant number of new trees that will have a greater long-term benefit to local ecology and biodiversity. The aforementioned full arboricultural details are submitted as part of this LRD application, but the submitted landscaping plans also illustrate the retained and proposed tree planting – please refer to same.</p>  |
|  |  | 15.6.12 | <p><b>Public Open Space and Recreation</b></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 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>The scheme proposes the creation of new public open spaces within this new urban quarter in Santry. The current gated condition of the site will be vastly improved through the proposed design, opening it up to accessibility and useability. A mixture of public and communal open spaces combining hard and soft landscaping, children's play, passive recreation etc. is proposed. The spaces have been designed in accordance with all relevant guidance. The scheme includes SuDs measures, biodiversity measures, outdoor recreation, connection and carbon absorption which ensures that a high-quality and sustainable development is provided.</p> |

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|  |  | <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"> <li>▪ The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.</li> <li>▪ Open space should be overlooked and designed to ensure passive surveillance is achieved.</li> <li>▪ The space should be visible from and accessible to the maximum number of users.</li> <li>▪ Inaccessible or narrow unusable spaces will not be accepted.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.</li> <li>▪ Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.</li> <li>▪ 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.</li> <li>▪ 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).</li> <li>▪ 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.</li> </ul> | <p>Public open space of c. 1,791m<sup>2</sup> (c.12%) is proposed.</p> <ol style="list-style-type: none"> <li>1. The design and layout of the open space in the development is to be connected to the adjoining open spaces to the south at Santry Place, collectively forming a network of interconnected amenity spaces.</li> <li>2. All the proposed open spaces will be overlooked.</li> <li>3. The opening up of the site to accessibility and permeability enhances visual connection and permeability into the proposed open spaces, to ensure natural surveillance and a safe environment for all, creating a useable, open and welcoming environment. All open spaces will be overlooked from the buildings.</li> <li>4. All the spaces proposed are usable by all.</li> <li>5. The submitted Daylight and Sunlight Assessment Report, states that most new communal and public open spaces pass the BRE requirement.</li> <li>6. The design and layout of the open space in the development is to be connected to the adjoining open spaces to the south at Santry Place, collectively forming a network of interconnected amenity spaces. The proposed open space has been specifically located in areas that will provide the most amenity in terms of orientation, accessibility &amp; surveillance.</li> <li>7. There is limited planting on the site at present, given its current hardstanding condition, but existing planting along the western boundary will be incorporated into the development.</li> <li>8. The scheme incorporates existing planting and thus integrates existing natural features.</li> <li>9. The proposed landscape setting aims to provide substantial benefit to the urban drainage due to the permeable areas that will be provided on site such green/blue roof, permeable paving and on ground attenuation areas. For further information refer to the submitted DBFL Infrastructure Design Report.</li> <li>10. The landscape scheme provides a planting concept with the following considerations: <ul style="list-style-type: none"> <li>○ Colour/Size/ Texture/Shape will enhance the attractive views of the site.</li> <li>○ Strategically located trees to create focal points.</li> <li>○ Different planting species for different spaces will emphasise the sense of space and the transition of the areas.</li> <li>○ The planting area will help to reduce surface water run-off.</li> </ul> </li> </ol> |
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|  |  |         | <ul style="list-style-type: none"> <li>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.</li> <li>Age friendly measures should be incorporated into the design.</li> <li>Permeability and accessibility for all users, particularly disabled persons should be provided.</li> <li>Cycle and pedestrian friendly routes should be accommodated.</li> </ul>   | <ul style="list-style-type: none"> <li>The planting species provided been selected in consideration of ecology &amp; biodiversity. Majority of the species will be low maintenance characteristics. It is envisioned that all planting of new vegetation will take place during construction in tandem with the construction of buildings; any trees or plants which, within a period of 5 years from the completion of the development, die, are removed, and that any which become seriously damaged or diseased are replaced in the next planting season.</li> </ul> <p>11. The proposed materials will be appropriate and sympathetic to the local character of the area and be an integral part of the design. Careful consideration has been given to the design, texture and colour of the materials of the streets, open spaces, paved areas and footpaths to ensure they will integrate with the design, which will assist in providing a high-quality living environment. All the hard landscaping materials will have a good resistance to accidental damage and low maintenance characteristics.</p> <p>12. All the proposed street furniture within the development has been strategically located to create gathering and relaxing areas accessible for all.</p> |
|  |  | 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 submitted Landscape Design Report and Boundary Treatment Plan prepared by Dermot Foley Landscape Architecture – please refer to same.  |
|  |  | 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 Statement of Consistency   |
|  |  | 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. 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> | Due to local constraints, district heating is not considered a viable option.  |

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|  |  | 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> <ul style="list-style-type: none"> <li>▪ The purpose of this statement is to demonstrate how low carbon energy and heating solutions have been considered 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:</li> <li>▪ the technical, environmental and economic feasibility of on-site renewable energy generation including solar PV and small scale wind power;</li> <li>▪ the technical, environmental and economic feasibility of at a minimum, the following high-efficiency alternative energy supply and heating systems:</li> <li>▪ decentralised energy supply systems based on energy from renewable and waste heat sources;</li> <li>▪ co-generation (combined heat and power);</li> <li>▪ district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable and waste heat sources;</li> <li>▪ heat pumps;</li> <li>▪ include an assessment of embodied energy impacts</li> </ul> | <p>An Energy Report is submitted as part of this LRD planning application – please refer to same.</p>   |
|  |  | 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 and Streets (2019) and Design Manual for Quality Housing (2022).</p>  | <p>The proposed development has regard to and follows the principles set out on the referenced guidelines.</p> <p>This Statement of Consistency has responded to these policy documents where relevant, as has the enclosed Architectural Design Statement, and Transport &amp; Traffic Assessment.</p> |

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|  |  | 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> <ul style="list-style-type: none"> <li>▪ A community and social audit should address the following:</li> <li>▪ Identify the existing community and social provision in the surrounding area covering a 750m radius.</li> <li>▪ Assess the overall need in terms of necessity, deficiency, and opportunities to share/ enhance existing facilities based on current and proposed population projections.</li> <li>▪ Justify the inclusion or exclusion of a community facility as part of the proposed development having regard to the findings of the audit.</li> </ul> <p>Where it is determined that new facilities are required the following design criteria should be considered:</p> <ul style="list-style-type: none"> <li>▪ The design of the facility should allow for multi-functional use.</li> <li>▪ Community facilities must be located so that they are conveniently accessible by both residents and others who may have reason to use the facility.</li> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ Community facilities must be accessible to all members of society including persons with disabilities and the elderly.</li> </ul> | <p>A Social Infrastructure Assessment (SIA) is enclosed as part of this submission – please refer to same for details. The SIA concludes that there are a wide range and variety of existing facilities in a catchment area of the subject site to support the development, with a large number of social amenities and facilities identified.</p> <p>Health care, childcare, education, sports and recreation, religious and community facilities are all well-represented in close proximity to the subject site to cater for the existing and future residential population. It is considered that the future population of the development will also benefit from the site's strategic location and transport routes which offer easy accessibility to the city centre to the south and outer city to the west and north.</p> <p>The submitted SIA concludes that the development proposal and its future population will be adequately supported by existing social and community infrastructure. In addition, the development proposal also provides for new social infrastructure which includes retail uses, medical suite / GP practice and floor space for community / arts / cultural uses, as well as public and communal open spaces.</p> <p>The proposed non-residential uses are accessible to all, with pedestrian and cyclist access through the entire development being prioritised.</p> <p>It is envisaged that the proposed community/arts &amp; culture space end user(s) will be developed in conjunction with Dublin City Council through compliance, however, the submitted Cultural Infrastructure (Impact) Assessment suggest potential end users, and the ground floor plan reflects same.</p> |
|  |  | 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</p>  | <p>A school need assessment has been undertaken and is submitted as a separate report as part of this LRD planning application, which concludes that the schools in the surrounding area are considered sufficient to serve the proposed development.</p>  |



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|  |  |          | large-scale developments (800+ units), the phased completion of the dwellings must be linked with the provision of new schools   |  |
|  |  | 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> <ul style="list-style-type: none"> <li>▪ 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).</li> <li>▪ The number of childcare facilities within walking distance (i.e. 1km) of the proposal.</li> <li>▪ The capacity of each childcare facility and the available capacity by completion of the project.</li> <li>▪ 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.</li> </ul> <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> | <p>There is no childcare facility proposed as part of the current development proposal for the subject site. The proposed development of 321 no. dwellings requires a childcare facility to cater for c. 86 no. children, based upon the requirements of the 2001 Childcare Facilities Guidelines. However, as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2023), 1 bed units should not generally be considered to contribute a requirement for childcare provision. Therefore, if one discounts the 104 no. 1 bedroom units proposed, that would result in 217 no. dwellings requiring childcare services, thus requiring a childcare facility to cater for c. 58 no. children, in accordance with the 2001 guidelines.</p> <p>The submitted SIA concludes that existing childcare facilities in the surrounding area have capacity for to meet this demand, by way of the 12 no. childcare providers in the locality as well as permitted childcare facilities in neighbouring developments of Santry Place and Omni Park (Planning Ref.s 2713/17 (as extended under Ref. 2713/17/X1), 2737/19 &amp; ABP-307011-20 respectively). The adjoining Santry Place development contains a creche that has capacity for 42 no. spaces and we note from the previous SHD on this subject site (Ref. ABP-310910-21) that the An Bord Pleanála Inspector stated that <i>“Having regard to current trends in population and household size, I consider that the capacity of this facility would be sufficient to cater for the likely combined demand from these developments”</i>.</p> |
|  |  | 15.8.4.1 | <p><b>Design Criteria</b></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 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>  | As outlined above, there is no childcare facility proposed as part of the development proposal.  |

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|  |  |         | 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.  |   |
|  |  | 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. <a href="https://www.dublincity.ie/residential/planning/strategic-planning/public-realm-strategy">https://www.dublincity.ie/residential/planning/strategic-planning/public-realm-strategy</a></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> | A letter of consent from Dublin City Council is submitted as part of this LRD application in relation to works to the public realm – please refer to same.  |
|  |  | 15.8.6  | <p>Public Open space</p> <p>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>   | The proposed development has public open space of c.12%, as detailed on the submitted drawings and in the enclosed Planning Statement.  |
|  |  | 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 subject site is currently gated; however, the proposed development will not be gated. Controlled vehicular access to the basement car park will be in place, as standard.</p> <p>The public and residents can easily access their home, the open spaces or the proposed non-residential uses provided within the overall development.</p> <p>The development provides a good balance between providing easily accessible public open spaces in addition to communal spaces for resident use.</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>This LRD application is accompanied by a Property Management Strategy Report – please refer to same.</p>   |                            |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |
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|           |                 | 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 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. 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:</p> <p>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"><li>▪ A minimum of 15% three or more bedroom units.</li><li>▪ A maximum of 25%-30% one bedroom / studio units.</li></ul> <p>Please review the full Section 15.9.1 if site located in these areas.</p> | <p>The subject site falls outside of the ‘sub-city’ areas of ‘Liberties’ and ‘North Inner City’. Therefore, SPPR 1 applies to the development.</p> <p>The proposed development comprises 104 no. one bed units, 198 no. two bed units and 19 no. three bed units. This provides a breakdown of 32% one bed units, 62% two bed units and 6% three bed units and therefore is fully in accordance with SPPR 1 of the Apartment Guidelines, 2022 which is set out below for ease of reference:</p> <p><i>“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).”</i></p> |                            |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |
|           |                 | 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: Table 15-5:</p> <table><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>   | 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. | <p>The unit size layout and floor areas all comply with the standards.</p> <p>The proposed development comprises 1-bed units which 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>Block</th><th>Total No. Units</th><th>No. 1 bed / 2 person units</th><th>No. 2 bed / 3 person units</th><th>No. 2 bed / 4 person units</th><th>No. 3 bed / 5 person units</th></tr><tr><td>A</td><td>51</td><td>22</td><td>0</td><td>23</td><td>6</td></tr><tr><td>B</td><td>38</td><td>6</td><td>0</td><td>26</td><td>6</td></tr><tr><td>C</td><td>53</td><td>14</td><td>6</td><td>33</td><td>0</td></tr><tr><td>D</td><td>44</td><td>22</td><td>0</td><td>15</td><td>7</td></tr></table> | Block | Total No. Units | No. 1 bed / 2 person units | No. 2 bed / 3 person units | No. 2 bed / 4 person units | No. 3 bed / 5 person units | A | 51 | 22 | 0 | 23 | 6 | B | 38 | 6 | 0 | 26 | 6 | C | 53 | 14 | 6 | 33 | 0 | D | 44 | 22 | 0 | 15 | 7 |
| 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.                    |  |   |                            |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |
| Block     | Total No. Units | No. 1 bed / 2 person units   | No. 2 bed / 3 person units   | No. 2 bed / 4 person units  | No. 3 bed / 5 person units |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |
| A         | 51              | 22                           | 0  | 23  | 6                          |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |
| B         | 38              | 6                            | 0  | 26  | 6                          |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |
| C         | 53              | 14                           | 6  | 33  | 0                          |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |
| D         | 44              | 22                           | 0  | 15  | 7                          |                              |        |            |           |       |             |           |       |             |           |       |             |           |  |       |                 |                            |                            |                            |                            |   |    |    |   |    |   |   |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |

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|           |      |        | <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. 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> <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> | <table><tr><td>E</td><td>49</td><td>7</td><td>0</td><td>42</td><td>0</td></tr><tr><td>F</td><td>52</td><td>13</td><td>0</td><td>39</td><td>0</td></tr><tr><td>G</td><td>34</td><td>20</td><td>0</td><td>14</td><td>0</td></tr><tr><td>Total No.</td><td>321</td><td>104</td><td>6</td><td>192</td><td>19</td></tr><tr><td>% mix</td><td>100%</td><td>32%</td><td>2%</td><td>60%</td><td>6%</td></tr></table>                     | E  | 49 | 7 | 0 | 42 | 0 | F | 52 | 13 | 0 | 39 | 0 | G | 34 | 20 | 0 | 14 | 0 | Total No. | 321 | 104 | 6 | 192 | 19 | % mix | 100% | 32% | 2% | 60% | 6% |
| E         | 49   | 7      | 0   | 42   | 0  |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |           |     |     |   |     |    |       |      |     |    |     |    |
| F         | 52   | 13     | 0   | 39   | 0  |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |           |     |     |   |     |    |       |      |     |    |     |    |
| G         | 34   | 20     | 0   | 14   | 0  |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |           |     |     |   |     |    |       |      |     |    |     |    |
| Total No. | 321  | 104    | 6   | 192  | 19 |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |           |     |     |   |     |    |       |      |     |    |     |    |
| % mix     | 100% | 32%    | 2%  | 60%  | 6% |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |           |     |     |   |     |    |       |      |     |    |     |    |
|           |      | 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>The proposed development includes 212 no. units out of a total of 321 no. which are over 10% minimum areas, which represents c.66% of the overall unit provision. Of these 212 no. oversized units, some 81 no. units are designed to be universal design (which also equates to c.25% of the total units provided). Please refer to the submitted architectural plans of the proposed dwellings and the HQA for details.</p> |    |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |           |     |     |   |     |    |       |      |     |    |     |    |
|           |      |        |   | <p>The proposed development has 48% dual aspect units (153 no. units in total), and 2% triple aspect units (6 no. units in total). Please refer to the submitted Planning Statement (section 6.3.5) and HQA for details.</p>   |    |    |   |   |    |   |   |    |    |   |    |   |   |    |    |   |    |   |           |     |     |   |     |    |       |      |     |    |     |    |

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|  |  |        | <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 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.  |
|  |  | 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>  | <p>The proposed development has a maximum of 8 no. apartments per floor per core and is therefore in compliance with SPPR 6 of the Apartment Guidelines. The <u>maximum</u> no. of units proposed per core per block is as follows:</p> <ul style="list-style-type: none"> <li>▪ <b>Block A:</b> 5 no. units per floor per core</li> <li>▪ <b>Block B:</b> 6 no. units per floor per core</li> <li>▪ <b>Block C:</b> 8 no. units per floor per core</li> <li>▪ <b>Block D:</b> 6 no. units per floor per core</li> <li>▪ <b>Block E:</b> 7 no. units per floor per core</li> <li>▪ <b>Block F:</b> 8 no. units per floor per core</li> <li>▪ <b>Block G:</b> 5 no. units per floor per core</li> </ul> |
|  |  | 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, as detailed and confirmed in the submitted HQA.  |

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|  |  | 15.9.7 | <p><b>Private Amenity Space</b><br/>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.<br/>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>  | <p>All units have private outdoor amenity space in accordance with the standards as detailed and confirmed in the submitted HQA.</p>   |
|  |  | 15.9.8 | <p><b>Communal Amenity Space</b><br/>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. 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.<br/>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.<br/>Development proposals shall demonstrate that the communal open space:</p> <ul style="list-style-type: none"> <li>▪ Complies with the minimum standards based on each individual unit.</li> <li>▪ 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.</li> <li>▪ Is secure for residents and benefits from passive surveillance.</li> <li>▪ Considers the needs of children in particular in terms of safety and supervision and is fully accessible to all.</li> <li>▪ Achieves good sunlight penetration – see Appendix 16.</li> <li>▪ Has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections.</li> </ul> | <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. The spaces will include suitable landscaping and planting to provide a high quality environment.</p> <p>The scheme provides well in excess of the communal open space requirement based on the unit mix (2,071sq.m required and 2,986sq.m provided). The open spaces will have generally good sunlight penetration and all spaces meet the relevant guidelines. Water and drainage connections can be provided for the open spaces.</p> |



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|  |  | 15.9.9  | <p><b>Roof Terraces</b></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. 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 planning, 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> | <p>Roof terraces are provided for in the proposed development as follows:</p> <ul style="list-style-type: none"> <li>▪ Block A (c.154.7sq.m)</li> <li>▪ Block C (c. 418.6 sq.m)</li> <li>▪ Block F (c. 436.1 sq.m)</li> <li>▪ on the proposed residential amenity use unit (c. 104.6 sq.m).</li> </ul> <p>All open spaces (public &amp; communal) will be appropriately landscaped, and managed by the Property Management.</p>                                |
|  |  | 15.9.10 | <p><b>Internal Communal Facilities</b></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 – 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.</p>   | <p>The proposed development provides large apartments that will have their own individual laundry facilities. A concierge space may be provided for in the single storey residential amenity building between Blocks A &amp; D, for use of all residents of the scheme. The community/arts/cultural spaces will be open to the public but may also be open to use by residents, subject to final use and as agreed with Dublin City Council post-planning.</p> |
|  |  | 15.9.11 | <p><b>Security</b></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>   | <p>The development incorporates safe and secure design principles as all common/public areas are overlooked. The ground floor uses such as apartments, retail and community/arts &amp; culture space will ensure that these areas have natural passive surveillance.</p>   |

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|  |  | 15.9.12 | <p><b>Access and Services</b><br/> 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.<br/> Internally within a scheme, access to each individual unit should be clearly identified and well lit through natural light where feasible.<br/> 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 | <p><b>Refuse Storage</b><br/> 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.<br/> 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>   | Refuse storage is provided at ground level and basement for all uses provided in the development. They are easily accessible near lift/stair cores. An Operational Waste Management Plan (prepared by AWN) is enclosed as an appendix to Chapter 13 of the submitted EIAR – please refer to same. |
|  |  | 15.9.14 | <p><b>Lifecycle Reports</b><br/> All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.<br/> 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.<br/> The reports should address each of the following headings:</p> <ul style="list-style-type: none"> <li>▪ Assessment of Long Term Running and Maintenance Costs</li> <li>▪ Property / Owner Management Company and Common Areas</li> <li>▪ Service Charge Budget</li> <li>▪ Measures to Manage and Reduce Costs</li> <li>▪ Treatment, Materials and Finishes</li> <li>▪ Construction Methodology</li> <li>▪ Material Specification</li> <li>▪ Landscaping</li> <li>▪ Waste Management</li> <li>▪ Human Health and Well –being</li> <li>▪ Residential Management</li> <li>▪ Energy and Carbon Emissions</li> </ul> | A Building Lifecycle Report is submitted as part of this LRD planning application – please refer to same.   |

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|  |  |           | <ul style="list-style-type: none"> <li>Transport and Accessibility</li> </ul> <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 strategy and objectives for the maintenance and operation of the development.</p> | A Property Management Strategy Report is submitted as part of this LRD planning application – please refer to same.   |
|  |  | 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>Please refer to the submitted Daylight and Sunlight Assessment Report by CS Consulting.</p> <p>A Wind Microclimate Modelling report, prepared by B-fluid is submitted as part of this LRD planning application – please refer to same.</p> |
|  |  | 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>  | The submitted Daylight and Sunlight Assessment Report has been prepared by CS Consulting – please refer to same.  |
|  |  | 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,</p>  | A Wind Microclimate Modelling report, prepared by B-fluid is submitted as part of this LRD planning application – please refer to same.   |

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|  |  |           | communal amenity spaces, roof gardens and at the entrance points to the scheme.<br>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 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.<br>Please refer to Table 15-6.   |  |
|  |  | 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"> <li>▪ 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.</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> <p>Proposals close to noisy places, such as busy streets / railway lines, may need a noise impact assessment and mitigation plan. (Noise maps and Noise Action Plan are available at <a href="http://www.dublincity.ie">www.dublincity.ie</a>).</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> | <p>The proposed apartments have been designed to accord with Part E of the Building Regulations.</p> <p>Please also refer to Chapter 10 “Noise” (prepared by AWN) of the submitted EIAR.</p> <p>We note from the previous EIAR submitted with the SHD application (Ref. ABP-310910-21) that in his assessment of same, the An Bord Pleanála Inspector stated the following: <i>“I have considered all of the application documentation and submissions received, and I am satisfied that impacts that are predicted to arise in relation to Noise would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Noise”.</i></p> <p>Given the similarity in this current LRD proposal to the previous SHD proposal, it is considered that there is no likelihood of significant effects on the environment arising from the proposed development in respect of noise and vibration.</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>A key priority throughout the detailed design stage of the development was to provide sufficient setbacks and appropriate transitions from neighbouring properties and the proposed development. To that end, staggered building heights have been proposed from a minimum of 7 storeys up to a max of 13 storeys (Block A) at the corner location / junction of Swords Road &amp; Santry Avenue.</p>   |

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|  |  |           | 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.  | The submitted Architectural Design Statement details boundary conditions of the proposed development with neighbouring properties and the separation distances provide – please refer to same.   |
|  |  | 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> <p>Overlooking may be overcome by a variety of design tools, such as:</p> <ul style="list-style-type: none"> <li>▪ Building configurations (bulk and massing).</li> <li>▪ Elevational design / window placement.</li> <li>▪ Using oblique windows.</li> <li>▪ Using architectural features.</li> <li>▪ Landscape and boundary treatments</li> </ul> | <p>The form and massing of the design has been carefully considered to minimise overlooking and overbearance. The predominant linear arrangement of the blocks assists with breaking down the massing of the development which ensures that the development will not be excessive or overbearing. The open spaces provided will also contribute towards the breaking down of the perceived massing.</p> <p>The submitted Architectural Design Statement details the disposition of the buildings within the scheme as well as the scale, massing and visual impact of the proposed development – please refer to same for more details.</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). Archaeologist to review this section of the Plan</p>  | <p>Please refer to Chapter 14 "Archaeology &amp; Cultural Heritage" contained in the submitted EIAR under which the proposed development was assessed in terms of its impact on archaeology.</p> <p>We note from the previous EIAR submitted with the SHD application (Ref. ABP-310910-21) that in his assessment of the archaeology chapter, the An Bord Pleanála Inspector stated the following: <i>"I have considered all of the application documentation and submissions received, and I am satisfied that the impacts predicted to arise in relation to Archaeology and Cultural Heritage would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Archaeology and Cultural Heritage"</i>.</p> <p>Given the similarity in this current LRD proposal to the previous SHD proposal, it is considered that there is no likelihood of significant effects on the environment arising from the proposed development in respect of archaeology and cultural heritage.</p> |
|  |  | 15.15.1.7 | Archaeological Excavation  | Please refer to Chapter 14 "Archaeology & Cultural Heritage" contained in the submitted EIAR under which the proposed development was assessed in terms of its impact on archaeology. That assessment sets out the following recommendations:  |

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|  |  |           | <p>When planning permission for development involving sub-surface excavation is granted, the applicant's attention will be drawn to the legal obligation to report the discovery of archaeological finds to the National Museum of Ireland.</p>  | <p>In the event of a grant of planning permission it is recommended that the removal of the concrete slab be monitored under licence and, after the demolition of the existing structure, a programme of archaeological testing be carried out across the site prior to any further groundworks on site.</p> <p>Time should be allowed between the monitoring works and any construction or service laying in case archaeological features are uncovered. These recommendations have been made in consultation with the Archaeology, Conservation &amp; Heritage Department of Dublin City Council.</p> <p>A report on the results of the monitoring programme should be submitted to the City Archaeologist and the National Monuments Service following the completion of the works. All recommendations are subject to the approval of the City Archaeologist and the National Monuments Service.</p>  |
|  |  | 15.15.1.8 | <p><b>Archaeological Mitigation</b></p> <p>Where a site has tested positive for archaeology, in situ remains shall be evaluated for preservation in situ. In situ medieval structures shall be carefully evaluated with the aim of preservation and presentation in situ within the new development. Where preservation in situ is not feasible, sites of archaeological and/or industrial heritage interest shall be subject to a full archaeological excavation and post excavation analysis according to best practice in advance of redevelopment. Where an excavation is the agreed mitigation strategy the licenced archaeological director shall submit bi-weekly briefing notes to the City Archaeologist for the full duration of the excavation. A preliminary excavation report in digital and hard copy shall be submitted to the planning authority for the attention of the City Archaeologist within four weeks of the completion of the excavation or of each phase of the excavation and a detailed final report submitted within twelve months of the completion of the excavation. The results of all archaeological excavations shall be evaluated for publication either as a monograph or scholarly article, within 1 year after archaeological site completion. Information about medieval sites will be disseminated to the public through the Friends of Medieval Dublin or similar free event within 1 year of site completion. The excavation archive shall be prepared in accordance with Dublin City Archaeological Archive (DCC, 2008) and submitted to the Dublin City Archaeological Archive within 1 year of excavation completion.</p> | <p>Please refer to Chapter 14 "Archaeology &amp; Cultural Heritage" contained in the submitted EIAR under which the proposed development was assessed in terms of its impact on archaeology.</p> <p>We note from the previous EIAR submitted with the SHD application (Ref. ABP-310910-21) that in his assessment of the archaeology chapter, the An Bord Pleanála Inspector stated the following: <i>"I have considered all of the application documentation and submissions received, and I am satisfied that the impacts predicted to arise in relation to Archaeology and Cultural Heritage would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Archaeology and Cultural Heritage"</i>.</p> <p>The archaeological impact assessment sets out the following recommendations:</p> <p>In the event of a grant of planning permission it is recommended that the removal of the concrete slab be monitored under licence and, after the demolition of the existing structure, a programme of archaeological testing be carried out across the site prior to any further groundworks on site.</p> <p>Time should be allowed between the monitoring works and any construction or service laying in case archaeological features are uncovered. These</p> |



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|  |  |           |   | <p>recommendations have been made in consultation with the Archaeology, Conservation &amp; Heritage Department of Dublin City Council.</p> <p>A report on the results of the monitoring programme should be submitted to the City Archaeologist and the National Monuments Service following the completion of the works. All recommendations are subject to the approval of the City Archaeologist and the National Monuments Service.</p> <p>Given the similarity in this current LRD proposal to the previous SHD proposal, it is considered that there is no likelihood of significant effects on the environment arising from the proposed development in respect of archaeology and cultural heritage.</p> |
|  |  | 15.15.1.9 | <p><b>Preservation In Situ</b></p> <p>Where a proposed development is at a known Monument / Site or within an Archaeological Zone, discussions about the retention of features within / below developments (preservation in situ) and mitigation options shall take place at the outset of project planning and shall be reviewed at each stage of the project. Before considering whether an archaeological site can be appropriately retained within a development (preserved in situ), the following shall be addressed: 1. The current state of preservation of the archaeological finds and deposits and how they contribute to the site's significance. 2. The likely development and how these will affect the site's significance. 3. For sites containing waterlogged archaeological remains, the availability and quality of water on the site and how sensitive this hydrological regime is to changes. Preservation assessments shall form a discrete part of desk-based assessments and site evaluation reports.</p> <p>Consideration shall be given to the impact of any development proposal on waterlogged deposits that could be potentially threatened through changes to the hydrological regime, water levels and quality. Test excavations shall be carried out to investigate and evaluate the deposits and the artefacts they contain in sufficient detail to establish their significance, their state of preservation and their susceptibility to adverse impact from proposed development. Preservation assessments (including characterisation of the environmental conditions of the deposits) to form a regular part of the evaluation methodology for sites where retention within the development is likely to be the final mitigation outcome. When the state of preservation of material is poor, and further burial following development is likely to cause additional damage to that material, excavation of the archaeological remains to recover their remaining significance and evidential value is the most appropriate strategy. Where sites contain waterlogged archaeological</p> | <p>Should archaeological material be recorded during monitoring of development works, an appropriate programme of mitigation will be developed by the monitoring archaeologist in consultation with the City Archaeologist, the Department of Housing Local Government and Heritage (DHLGH) and the National Museum of Ireland National Museum of Ireland (NMI).</p>   |

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|  |  |            | remains, water environment studies to determine water availability and water stresses may be required. If the condition of surviving material and deposits is good and development risks are not going to cause a change to below ground environments (including site hydrology), then harm to significance may be limited. In these instances, the retention of the site and its future management as part of the development may be achievable. For such sites, monitoring will not normally be necessary. Where there is concern about potential impacts of development on well preserved archaeological remains, it is good practice for monitoring to only be considered appropriate if a mitigation scheme is in place to manipulate water levels or provide access for future excavation if environmental conditions deteriorate.   |  |
|  |  | 15.15.1.10 | <p><b>Piling and Archaeology</b></p> <p>Where piling is being considered as part of a foundation design on a site containing archaeological remains, a range of site-specific information will be needed to enable sound decision taking with regard to the particular technical issues raised by the use of piled foundations.</p> <ul style="list-style-type: none"> <li>• The applicant shall provide sufficient information demonstrating an adequate understanding of the significance of the archaeological site and assessment of potential harm to that significance arising from the development.</li> <li>• The planning application shall include an appropriate desk-based assessment and where necessary the site will be evaluated by way of archaeological testing in advance of the grant of permission.</li> <li>• Sufficient geotechnical site investigation shall be undertaken in accordance with Eurocode 7, early in the design process to ensure that appropriate engineering information is available to allow for a flexible foundation design and reduce the impact on archaeological remains.</li> <li>• The developer shall consider foundation options and inform the piling contractors that archaeological remains are present on site before they tender.</li> </ul> <p>Technical aspects associated with piled foundations will be appropriately assessed. These include but are not necessarily limited to:</p> <ol style="list-style-type: none"> <li>1. The potential for the particular pile type utilised to damage archaeological deposits.</li> <li>2. The cumulative impact of successive piling on a site resulting in damage to so much of a site that future re-examination would not be worthwhile.</li> <li>3. The potential for piling to change the site hydrology, draining waterlogged deposits</li> </ol> | There are currently no known archaeological remains within the site. |

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|  |  | 15.15.1.11 | <p>Recording of Historic Buildings</p> <p>Buildings on the first edition OS that are not protected structures shall be recorded as part of the archaeological assessment that accompanies the planning application. Appropriate specifications for the recording of historic buildings will be determined in consultation with the City Archaeologist. Records of historic buildings will inform decisions relating to the approval or implementation of a scheme of development as part of the planning process or to document buildings, or parts of buildings, which will be lost as a result of demolition or alteration</p>   | <p>An Architectural Heritage Impact Assessment (AHIA) has been undertaken for the proposed development by Dermot Nolan, Conservation Architect, in light of the industrial building on site and due to Santry's long history as a location for commercial and industrial purposes in Dublin. Please refer to the submitted AHIA for full details.</p>  |
|  |  | 15.15.2.1  | <p>Architectural Conservation Areas</p> <p>Development in these zones must respect the existing character of the area and protect and enhance the setting and appearance of the streetscape and / or protected features. Details on the requirements for development within ACA's are set out in Policy BHA7 and BHA8 as set out in Chapter 11 as well as in the specific Framework for each ACA.</p> <p>Larger scale applications within or immediately adjacent to an ACA will need to provide an assessment, carried out by a suitably qualified conservation professional, of the impact of the development on the ACA the streetscape and the buildings in the immediate vicinity and demonstrate that there will be no material, adverse impact arising. Such an assessment should be accompanied by appropriate drawings, imagery and photomontages of the site and the surrounding context to assist the planning authority in assessing the impacts of the development.</p> | <p>The subject site is not located within an Architectural Conservation Area (ACA), and there are no Architectural Conservation Areas within the vicinity of the site.</p> <p>Please refer to the submitted AHIA for details.</p> <p>Please also refer to Chapter 14 "Archaeology &amp; Cultural Heritage" contained in the submitted EIAR under which the proposed development was assessed in terms of its impact on archaeology and cultural heritage.</p> <p>Please also refer to Chapter 15 "The Landscape" contained in the submitted EIAR under which a Landscape and Visual Impact Assessment of the proposed development is provided for.</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 &amp; Transport Assessment Report prepared by DBFL Consulting Engineers for details.</p>  |
|  |  | 15.17.2    | <p>Public Lighting</p> <p>Where 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</p>  | <p>A public lighting scheme is submitted with this LRD application, prepared by Sabre.</p>   |

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|  |  |         | <p>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"> <li>▪ Details of the column height, siting and location of the lighting.</li> <li>▪ Details of the specific lantern type and design.</li> <li>▪ Details of lighting specification including lighting class, lux levels and energy efficiencies.</li> <li>▪ 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.</li> </ul>   |   |
|  |  | 15.17.3 | <p><b>Public Art</b></p> <p>Public art can make a positive contribution to the cultural identity and visual appearance of an area and can be utilised to identify historic events and features adding to the quality and engagement of the public realm. The provision of artwork on hoarding will also be supported in accordance with the requirements as set out below. New public artwork should integrate with its immediate location and the context of the surrounding environment.</p> <p>Proposals for public artwork should:</p> <ul style="list-style-type: none"> <li>▪ Consider scale, form and impact on the public realm, pedestrians and road users.</li> <li>▪ Illustrate a comprehensive understanding of site considerations, and the physical, social, historical, topographical and architectural context.</li> <li>▪ Provide for the highest aesthetic quality in terms of materials and finishes with low maintenance value.</li> <li>▪ Engage with the local community to enhance social relevance and significance</li> </ul> | Upon a grant of permission, such details will be agreed at compliance stage with Dublin City Council.   |
|  |  | 15.18.1 | <p><b>Construction Management</b></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>   | A Construction & Environmental Management Plan is submitted as part of this LRD planning application – prepared by DBFL Engineers – please refer to same. |

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|  |  | <p>Demolition/renovation/refurbishment projects generating in excess of 100 cubic metres in volume of Construction and Demolition (C&amp;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 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"> <li>▪ Hours of operation.</li> <li>▪ Construction/phasing programme.</li> <li>▪ Community Liaison Strategy</li> <li>▪ Traffic Management Plan including employee parking and movements.</li> <li>▪ Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures.</li> <li>▪ Cumulative impacts.</li> <li>▪ Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats.</li> <li>▪ The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan</li> </ul> |  |
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|  |  |           | <ul style="list-style-type: none"> <li>▪ Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater).</li> <li>▪ 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.</li> <li>▪ Details of a water quality monitoring and sampling plan.</li> <li>▪ Measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).</li> </ul>  |  |
|  |  | 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 Construction Traffic Management Plan is enclosed – please refer to the submitted DBFL drawing no. EN 6000-000-001 “Mixed Use Development – Site Management”.</p> <p>Details of construction traffic management are set out in the submitted Construction &amp; Environmental Management Plan, prepared by DBFL Engineers – please refer to same.</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 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>   | <p>It is envisaged that the proposed development will be delivered over three phases, as set out below and as illustrated on the submitted Davey+Smith drawing No. D1809.P30 ‘<i>Site Layout Plan – Phasing</i>’:</p> <ul style="list-style-type: none"> <li>▪ <b>Phase 1:</b> The first phase of development will consist of the delivery of the basement level car park, Blocks A &amp; B (89 no. residential dwellings, 3 no. retail units &amp; a medical suite / GP Practice unit), and the communal open space to the west of Blocks A-B / east of Blocks C-D.</li> <li>▪ <b>Phase 2:</b> The second phase of development will consist of the delivery of Blocks C &amp; D (97 no. residential dwellings and associated community/arts &amp; culture space accommodated on the ground floors of same – c.612.6m<sup>2</sup>), the single storey residential amenity use unit (between Blcos A &amp; D), and the public open space for the development.</li> <li>▪ <b>Phase 3:</b> The third phase of development will consist of the delivery of Blocks E-F, &amp; G (135 no. residential dwellings &amp; and associated community/arts &amp; culture</li> </ul> |



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|  |  |         |  | <p>space accommodated on the ground floors of same – c.877.2m<sup>2</sup>) and the remainder of the communal open space (to the west Blocks E &amp; F and east Block G).</p> <p>It should be noted, however, that the phasing details submitted as part of the application are a proposal and it is considered that, given the scale of the development, a final phasing plan can be agreed with the local authority prior to commencement of development should a grant of permission be forthcoming.</p> |
|  |  | 15.18.2 | <p><b>Waste Management</b></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 has prepared the enclosed Operational Waste Management Plan (OWMP) for the proposed development – it is enclosed as an appendix to Chapter 13 of the submitted EIAR – please refer to same.</p>  |
|  |  | 15.18.4 | <p><b>Basements</b></p> <p>It is the policy of Dublin City Council to generally discourage any significant underground or basement development or excavations below ground level of, or adjacent to, residential properties in Conservation Areas or to protected structures. Development of basements for residential use below the estimated flood levels for flood zone areas 'Zone A' or 'Zone B' will not be permitted (Policy SI20).</p> <p>It is the policy of the City Council that a Basement Impact Assessment (BIA) shall accompany all planning applications that include a basement. A basement or underground development is considered as being an accessible area positioned below the existing street level or ground level and would</p>   | <p>The development includes a basement, and we note that the site is located in Flood Zone C. A Basement Impact Assessment is enclosed as part of this LRD planning application.</p>   |

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|  |  |         | include any works that will remain permanently in the ground, such as embedded wall construction below the base of the accessible area.<br>Detailed guidance is set out in Appendix 9 regarding the content and scope to be considered in the preparation of a Basement Impact Assessment  |  |
|  |  | 15.18.5 | <p>Telecommunications and Digital Connectivity</p> <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 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 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 of the Development Plan.</p> <p>The Applicant is not seeking permission for telecommunication antennae and support structures. Notwithstanding, the population density created may require one in the future.</p> <p>The Applicant notes this and will take it into account should it seek planning permission in the future for telecommunication antennae and support structures, if required.</p> |

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|  |  | 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.</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>The proposed development includes PV Panels to convert solar radiation into electricity.</p> <p>A Glint and Glare Assessment has not been deemed necessary for this application, as it was not requested in the LRD opinion issued by the Planning Authority and is therefore not included in this planning application.</p>   |
|  |  | 15.18.9 | <p>Noise</p> <p>Development proposals for residential development within designated noise zones, such as Dublin Airport Aircraft Noise Zones or which may generate noise sensitive activities should be accompanied by a noise impact assessment to analyse the potential noise impact on the development proposal. The applicant is required to demonstrate good acoustic design has been followed to mitigate against any potential noise impacts. Airport Noise Zone C is partially located within the Dublin City Council administrative boundary.</p> <p>Construction noise assessment should form part of the construction management plan and set out clear mitigation measures in place throughout the entire construction phase.</p> <p>Operational noise should be assessed as part of the planning application to determine whether the proposed use of the development will impact on the ambient noise levels of the surrounding environment. Appropriate sound proofing and noise mitigation measure should be provided where necessary.</p> | <p>The proposed apartments have been designed to accord with Part E of the Building Regulations.</p> <p>Please refer to Chapter 10 "Noise" (prepared by AWN) of the submitted EIAR. We note from the previous EIAR submitted with the SHD application (Ref. ABP-310910-21) that in his assessment of same, the An Bord Pleanála Inspector stated the following: <i>"I have considered all of the application documentation and submissions received, and I am satisfied that impacts that are predicted to arise in relation to Noise would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Noise"</i>.</p> <p>Given the similarity in this current LRD proposal to the previous SHD proposal, it is considered that there is no likelihood of significant effects on the environment arising from the proposed development in respect of noise and vibration.</p> <p>A Construction &amp; Environmental Management Plan is submitted which sets out measures in relation to noise and vibration during construction.</p> |

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|  |  | 15.18.10 | <p><b>Air Quality</b></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>Please refer to Chapter 8 “Air Quality” (prepared by AWN) of the submitted EIAR. We note from the previous EIAR submitted for the SHD application in 2021 (Ref. ABP-310910-21), that in his assessment of same, the An Bord Pleanála Inspector stated the following: <i>“I have considered all of the application documentation and submissions received, and I am satisfied that impacts that are predicted to arise in relation to Air Quality and Climate would be avoided, managed and mitigated by the measures which form part of the proposed scheme. I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative impacts in terms of Air Quality and Climate”.</i></p> <p>Given the similarity in this current LRD proposal to the previous SHD proposal, it is considered that there is no likelihood of significant effects on the environment arising from the proposed development in respect of air quality.</p> <p>Construction &amp; Environmental Management Plan is submitted which sets out measures in relation to noise and vibration during construction.</p> |
|  |  | 15.18.11 | <p><b>Ground Investigation</b></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 underground lands shall be provided as part of a planning application</p>   | <p>A ground investigation report was carried out on the neighbouring development (Planning Ref: 2713/17 &amp; 2737/19 by GII, in January 2019.</p> <p>A full site investigation will be undertaken prior to construction and following grant of planning approval, the basement design/construction will take the findings into account.</p> <p>A Hydrogeological Impact Assessment was completed for the site by AWN consulting under a separate cover on 18/06/2021, which has been updated for this LRD planning application and is enclosed. The Hydrogeological Impact Assessment was undertaken to assess the potential for any likely significant impacts on receiving waters and protected ecological areas during construction or post development, in the absence of taking account of any measures intended to avoid or reduce harmful effects of the proposed project (i.e. design or mitigation measures).</p> <p>A basement impact assessment is also submitted as a separate standalone report – please refer to the both of the aforementioned reports for full details.</p>  |
|  |  | 15.18.12 | <p><b>Ground Contamination</b></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</p>   | <p>A ground investigation report was carried out on the neighbouring development (Planning Ref: 2713/17 &amp; 2737/19 by GII, in January 2019.</p> <p>A full site investigation will be undertaken prior to construction and following grant of planning approval, the basement design/construction will take the findings into account.</p>  |

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|  |  |          | <p>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"> <li>▪ Undertaking a detailed site investigation, soil testing and analysis to establish whether contamination has occurred.</li> <li>▪ Providing a detailed written report of investigation and assessment (including recommendations for treating the affected ground) to Dublin City Council.</li> <li>▪ 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.</li> <li>▪ Decontamination activities should ensure that there is no off-site migration of contaminants via run-off, soils or groundwater.</li> </ul> | <p>A Hydrogeological Impact Assessment was completed for the site by AWN consulting under a separate cover on 18/06/2021, which has been updated for this LRD planning application and is enclosed. The Hydrogeological Impact Assessment was undertaken to assess the potential for any likely significant impacts on receiving waters and protected ecological areas during construction or post development, in the absence of taking account of any measures intended to avoid or reduce harmful effects of the proposed project (i.e. design or mitigation measures).</p> |
|  |  | 15.18.14 | <p><b>Flood Risk Management</b></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).</p> <p>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>   | <p>DBFL Consulting Engineers have prepared the submitted Site Specific Flood Risk Assessment - please refer to same. The subject site is located in Flood Zone C.</p>  |

| Appendix | Section | Policy / Objective Number | Policy / Objective  | Compliance   |
|----------|---------|---------------------------|---|--|
| 3        | 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 | The proposed development is a higher density scheme which will provide a range of residential unit sizes in addition to a retail units (3 no.) GP practice/medical |

|                            |                                  | <p>buildings – see Figure 1 below. High quality design and placemaking are however, the critical factors when developing higher density developments...</p> <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> | <p>suite and c.1,460sq.m of floorspace dedicated to community/arts/cultural uses and open spaces. Good quality placemaking principles have been embedded into the design. The nature of the scheme will facilitate the creation of a sustainable neighbourhood. Please refer to the Planning Statement and Architectural Design Statement for details</p> |                                  |                            |         |      |         |         |                                |                   |        |           |         |               |        |  |
|----------------------------|----------------------------------|---|---|----------------------------------|----------------------------|---------|------|---------|---------|--------------------------------|-------------------|--------|-----------|---------|---------------|--------|--|
|                            | Table 1                          | <p>As a general rule, the following density ranges will be supported in the city.</p> <p>Table 1: Density Ranges</p> <table><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>  | 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>The subject site is located in the Outer Suburbs which is recognised as being outside of the canal ring where heights of 3 to 4 storeys will be promoted as the minimum, and 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 etc.</p> <p>Through the assessment of the previous SHD application for the subject site (Ref. ABP-310910-21), the site has been acknowledged as being a “public transport corridor”. Therefore, in light of same, the current CDP also acknowledges that there is recognised scope for the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors including <i>inter alia</i> Bus connects/Core Bus Corridors (CBC's), and that locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, with the subject site being adjacent to an existing public transport corridor (Swords Road QBC), which is also a proposed BusConnects Core Bus Corridor. The existing QBC running along Swords Road is utilised by Dublin Bus routes 16, 33, 41, 41b, 41c, and 41d. The aforementioned bus routes travel along the Swords</p> |
| 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>Road corridor which lies to the immediate east of the subject site. All the aforementioned Dublin Bus operated bus services operate on a daily basis and offer relatively frequent schedules.</p> <p>Taking all of the foregoing into account, it is considered that the proposed density of 214 no. units per hectare is appropriate and in compliance with the relevant planning policy and guidance for density.</p> <p>Full details of the proposed density and its appropriateness are set out under sections 5.3 &amp; 7.1.6 of this Statement of Consistency – please refer to same.</p> |                       |                          |              |         |        |                   |         |        |                   |         |        |                                       |         |        |  |
|---------------------------------------|-----------------------|--------------------------|--|--|-----------------------|--------------------------|--------------|---------|--------|-------------------|---------|--------|-------------------|---------|--------|---------------------------------------|---------|--------|--|
|                                       |                       |                          | <p>There will be a general presumption against schemes in excess of 300 units per hectare. Recent research has shown that very high density can challenge positive responses to context, successful placemaking and liveability aspirations, sometimes resulting in poor quality development. Schemes in excess of this density will only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented. 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>The proposed development does not exceed 300 units per hectare.</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>Higher plot ratio and site coverage may be permitted in certain circumstances such as:</p> <ul style="list-style-type: none"><li>Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.</li><li>To facilitate comprehensive re-development in areas in need of urban renewal.</li></ul> | 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 proposed development has total floor area of 25,530.1m<sup>2</sup> (including the non-residential elements) and, based upon the gross site area of 1.5 hectares (15,000m<sup>2</sup>) produces a plot ratio of c. 1 : 1.7.</p> <p>The existing CDP (Table 2 in Appendix 3, Volume 2) states an indicative plot ratio of 1.0 - 2.5 for the Outer Employment and Residential Area.</p> <p>The proposed site coverage is c. 33.5%, with the CDP stating an indicative site 45-60% for the Outer Employment and Residential Area.</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%                   |  |  |                       |                          |              |         |        |                   |         |        |                   |         |        |                                       |         |        |  |



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|   |     |     | <ul style="list-style-type: none"> <li>▪ To maintain existing streetscape profiles.</li> <li>▪ Where a site already has the benefit of a higher plot ratio.</li> <li>▪ To facilitate the strategic role of significant institution/employers such as hospitals.</li> </ul> <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> <p>Please review Table 3 and ensure proposal is in accordance if increased height</p> | Performance criteria as per Table 3 have been fully complied with in the proposed development, as set out under section 7.1.7 of this Statement of Consistency – please refer to same.   |
| Appendix 5 - Transport and Mobility: Technical Requirements | 2.1 | -   | All developments shall be constructed in accordance with the design guidance and requirements set out in DMURS  | A DMURS Statement of Consistency has been prepared by DBFL Consulting Engineers and is submitted as apt of this LRD planning application – please refer to same.   |
|   |     | 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  | <p>A Traffic &amp; Transportation Assessment (TTA) accompanies this submission.</p> <p>A Stage 1 Road Safety Audit of the scheme has been undertaken and is submitted with this LRD planning application – please refer to same.</p> |
|   |     |     | 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.   | A Stage 1 Road Safety Audit of the scheme has been undertaken and is submitted with this LRD planning application – please refer to same.  |
|   |     | 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  | A Mobility Management Plan is included with this application, while section 5 of the TTA sets out a Parking Management Plan for the proposed development.  |

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|  |  |     | any associated 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 identifies the site access to be used for deliveries to the site with dedicated set down areas. This area is to be used for service and delivery vehicles.   |
|  |  | 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  | A vehicle swept-path analysis is submitted as part of this LRD application to demonstrate the safe manoeuvrability of all emergency & service (waste) vehicles servicing the site.  |
|  |  | 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"> <li>▪ Details how the proposed development will be accessed and served by deliveries, including refuse vehicles and emergency vehicles</li> <li>▪ 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;</li> <li>▪ Swept-path analysis demonstrating the safe manoeuvrability of all vehicles servicing the site.</li> </ul> <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> | <p>A vehicle swept-path analysis is submitted as part of this LRD application to demonstrate the safe manoeuvrability of all emergency &amp; service (waste) vehicles servicing the site.</p> <p>Please refer to the Traffic and Transportation Assessment, which outlines the relevant details with regard to this policy for the subject development.</p> |
|  |  | 2.5 | 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   | Please refer to the enclosed Traffic and Transportation Assessment, which outlines in detail how the available  |

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|  |  |  | 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  | car parking spaces will be managed throughout the development.  |
|  |  |  | 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).  | Please see the enclosed the submitted Traffic and Transportation Assessment which details the rationale for the proposed car parking provision using a number of sources.   |
|  |  |  | 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 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   | Please see the enclosed the submitted Traffic and Transportation Assessment), which details the proposed bicycle parking provision for both long (residents and staff) and short (visitors) term users and how these users may access these facilities from either of the site accesses.  |
|  |  |  | <p>Traffic Engineer – Please review cycle and car parking requirements in Sections 3.0, 4.0, 5.0, 6.0, 7.0 and 8.0 of Appendix 3.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>▪ EV parking – all must be futureproofed for EV Charging and a minimum of 50% of spaces should be fully functional.</li> <li>▪ Motorcycle parking – 5 % of car parking</li> <li>▪ 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.</li> <li>▪ 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.</li> </ul> | <p>Please see the enclosed the submitted Traffic and Transportation Assessment, 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"> <li>▪ Traffic and Transportation Assessment Report has been submitted.</li> <li>▪ An MMP has been submitted.</li> <li>▪ The proposals include a Parking Strategy Report.</li> <li>▪ 53% of all car parking bays are provided with EV charge points.</li> <li>▪ The appropriate number of accessible car parking bays have been incorporated into the scheme design and distributed at surface level and basement level adjacent to building accesses and site cores.</li> </ul> |

|  |  |   |  | <ul style="list-style-type: none"><li>▪ The size of the proposed on-site car parking spaces accords with DCC requirements.</li><li>▪ 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.</li><li>▪ The appropriate number of long and short term bicycle parking has been provided.</li><li>▪ The appropriate number of motorcycle parking spaces have been provided.</li><li>▪ 4 No. car share vehicles are proposed</li><li>▪ All external works to be taken in charge have been specified to DCC standards.</li></ul> |  |           |     |           |     |  |
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| Appendix 11 - Technical Summary of Green & Blue Roof Guide | 2.2  | - | <p>Engineer to review entire appendix. Key item below:<br/>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.<br/>The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.<br/>Table 1: Green Blue Roof Minimum Coverage</p> <table><tr><th>Type of green roof</th><th>Minimum coverage<br/>(% 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.<br/>Exemptions<br/>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.<br/>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> | Type of green roof   | Minimum coverage<br>(% of total roof area being developed) | Extensive | 70% | Intensive | 50% | <p>Green / Blue Roofs provided for the development. Please refer to DBFL Consulting Engineers Infrastructure Design Report (Section 3.3.9) and relevant drawings. Green / Blue Roof provision of 70% coverage is achieved.</p> |
| Type of green roof   | Minimum coverage<br>(% of total roof area being developed) |   |  |  |  |           |     |           |     |  |
| Extensive  | 70%  |   |  |  |  |           |     |           |     |  |
| Intensive  | 50%  |   |  |  |  |           |     |           |     |  |
| Appendix 18 - Ancillary Residential Accommodation          | 1.5  | - | <p>Separation Distances<br/>In cases where the backs of dwellings face each other or where the side of one dwelling faces the rear of a neighbouring property, a certain degree of separation is required to avoid any overbearing effect of one dwelling upon the other. With the emphasis on increased residential densities and the consequent incorporation of a variety of unit types and sizes in schemes, the requirement for 22 metre separation in such cases may no longer be</p>  | <p>The proposal seeks to maximise the internal separation distances as far as possible.</p> <p>A key priority throughout the detailed design stage of the development was to provide sufficient setbacks</p>   |  |           |     |           |     |  |

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|  |  |  | <p>applicable in certain instances. The acceptable reduction of such distances, however, requires a high standard of building design and layout particularly having regard to the height and inter-relationship between buildings, the use and aspect of rooms and relative floor levels.</p> <p>The exact distances applicable in such cases will be determined on a case-by-case basis having regard to the above criteria and other relevant development plan standards. The planning system does not give neighbours 'a right to a view' and does not always prevent people's view from being blocked. However, extensions should be designed so as not to dominate or appear unduly overbearing when viewed from adjoining properties.</p> | <p>and appropriate transitions from neighbouring properties and the proposed development. To that end, staggered building heights have been proposed from a minimum of 7 storeys up to a max of 13 storeys (Block A only) at a landmark, corner location.</p> <p>The submitted Architectural Design Statement details boundary conditions of the proposed development with neighbouring properties and the separation distances provided.</p> |
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## **8.0 Conclusions of Statement of Consistency**

**8.1** This Statement of Consistency has been prepared by Armstrong Fenton Associates, Planning Consultants, on behalf of Dwyer Nolan Developments Ltd., (the applicant), to accompany this planning application in respect of a proposed Large-Scale Residential Development (LRD) in respect of lands located at the junction of Santry Avenue and Swords Road, Santry, Dublin 9.

**8.2** This Statement of Consistency has detailed how the proposed development is consistent with the objectives of the relevant planning policies pertaining to the development site at local, regional, and national level. It is also considered that the proposed development is consistent with national policy and with the policies and objectives of the current City Development Plan. The proposed development will result in a very attractive place to live on zoned serviced lands in close proximity to public transport and local services.

**8.3** At a national and regional level, this statement has demonstrated the compliance of the development with the following:

- Project Ireland 2040 - National Planning Framework (2018)
- Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)
- Housing for All – a New Housing Plan for Ireland (2021)
- Urban Development and Building Heights Guidelines for Planning Authorities (2018)
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023)
- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)
- Urban Design Manual – A best practice guide (2009)
- Guidelines for Planning Authorities for Child Care Facilities (2001)
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)
- Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)
- Design Manual for Urban Roads and Streets (DMURS) (2019)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (2019)
- Transport Strategy for the Greater Dublin Area 2022-2042.

**8.4** At local level, this statement has demonstrated the compliance of the development with the following, statutorily adopted Plan for the administrative area within which the subject site is located:

- Dublin City Development Plan 2022-2028.

**8.5** Having regard to all the foregoing contained in this Statement of Consistency, it is considered that the proposed development is appropriate for the subject site. The proposed redevelopment of the subject site in Santry represents an opportunity to deliver a mixed-use and residential development offering a quality living environment, respectful of its context and character, while making efficient use of land which is in close proximity to / adjacent to existing and planned high frequency public transport services. It is considered that the proposed development is fully in accordance with Government guidance in relation to the delivery of new apartment developments, supports the objectives of the CDP, national and regional policy, and represents the proper planning and sustainable development of the area.

