



Planning Report including Statement of Consistency

Strategic Housing Development at White Heather, South Circular Road, Dublin 8.

April 2022

Contents

Executive Summary.....	3
1. Introduction	6
2. Site Location and Context.....	9
3. Planning History	14
4. Pre-Application Consultations.....	18
5. Description of Proposed Strategic Housing Development.....	25
6. Statement of Consistency	29
7. Conclusion.....	77

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Status: Final

Date: April 2022

For and on behalf of Avison Young Planning and Regeneration Limited

Executive Summary

U and I (White Heather) Limited ("the Applicant") is submitting this application to An Bord Pleanála ("the Board") under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016 ("the 2016 Act") in relation to the proposed Strategic Housing Development [SHD] at the White Heather Industrial Estate, South Circular Road, Dolphins Barn, Dublin 8; No. 307/307a South Circular Road, Dublin 8; and 12a St James Terrace, Dublin 8. The c. 1.535 ha site is bounded by the Grand Canal to the south; Our Lady of Dolour's Church and residential dwellings on the South Circular Road to the north; Priestfield Cottages to the east; and residential dwellings at St James's Terrace to the west.

The Applicant submitted a request to enter into pre-application consultations with the Board under section 5 of the 2016 Act in September 2021 in relation to a similar scheme on the subject lands. The tripartite pre-application meeting took place online on 29th November 2021 and was attended by representatives of the Board, Dublin City Council ("the planning authority"), and the Applicant (including members of the Design Team). A number of section 247 pre-application meetings held with the planning authority were undertaken prior to the tripartite pre-application meeting under section 5. The Board issued an opinion on 7th December 2021 which stated that the Board is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development. The Board also outlined specific information which should be submitted with any application for permission.

The proposed strategic housing development seeks to develop a new residential neighbourhood of 335 no. Build to Rent units and will make efficient use of this residentially-zoned site which benefits from high-quality amenity space along the Grand Canal and access to high-quality transport linkages. The site benefits from the opportunity to link with the existing Dolphins Barn neighbourhood facilities and amenities, as well as enhancing the connectivity of the area for the Dublin 8 community as a whole. A core principle of the proposed SHD is to place residential amenity and recreation to the fore, opening up the site and the local area to the Grand Canal in a manner which, currently, does not exist.

Across 7 no. blocks, the residential mix of the proposed 335 no. units includes a combination of studio units, 1-bedroom apartments, 2-bedroom apartments, duplex units and a terrace of 3-bedroom townhouse units. The proposed Part V social housing requirement is provided at 10% in 2 no. blocks within the proposed scheme. This high-quality Build to Rent residential scheme will also include 2 no. cafés and a creche, while the residents will also have access to a number of meeting and event spaces, a gym/yoga studio, a resident's lounge, a media suite, and a kitchen-dining area, with access to a roof terrace area at 5th floor level overlooking the canal. A landscaped square will be accessible to the public,

with private open space and amenity areas for the residents also provided including children's play areas. Building heights range from 2 no. to 10 no. storeys, with finger blocks arranged in a north-south direction and height tapering down from the centre of the site to the boundary.

The entrance to the scheme will be via the existing junction at the South Circular Road, which will be reconfigured and upgraded. The existing access road at St James's Terrace will provide pedestrian access only to the site. Car parking is proposed at under-croft and surface levels, with a number of dedicated car sharing spaces in convenient locations. Covered and secure bicycle storage facilities are located also at under-croft and surface level, adjacent to individual block entrances. A sustainable travel approach has been adopted, particularly with regards to access to Dublin City Centre, with the Luas (c. 800m away) and Dublin Bus stops adjacent to the development site. The City Centre area is also accessible by bicycle and walking, at approximately 10 and 30 minutes respectively.

The Applicant has consulted with Dublin City Council, in its capacity as planning authority, under section 247 of the 2000 Act, and has complied with the relevant requirements of the 2016 Act and Part 23 of the Planning and Development Regulations 2001, as amended ("the SHD Regulations").

This Planning Report includes a Statement of Consistency, which outlines the manners in which the proposal is consistent with the objectives of the development plan, i.e., the Dublin City Development Plan 2016-2022 ("the Development Plan") and relevant guidelines issued by the Minister under section 28 of the Planning and Development Act 2000, as amended ("the 2000 Act").

As the proposed development contravenes the Development Plan in relation to building height, unit mix, private amenity space, car parking standards, studio apartment widths and unit floor areas, reference should be given to the Material Contravention Statement, which is included as part of this application, and which demonstrates that permission may be granted having regard to the criteria specified in section 37(2)(b) of the 2000 Act.

The proposed SHD has been designed in accordance with national, regional and local planning policies and Ministerial Guidelines issued under section 28 of the 2000 Act ("section 28 Guidelines"). The proposal will contribute towards the consolidation of Dublin City in accordance with national policy to shift away from current patterns of low-density development towards more sustainable, compact urban growth within the built-up footprint of existing urban settlements. By placing people nearer to employment areas, services, and amenities, the proposed development will provide for a more efficient use of land on what is currently an underutilised (serviced) urban site, preventing further urban sprawl and leading to increased efficiency and sustainability in the use of energy and public infrastructure that is consistent with national policy requirements compact urban growth.

The proposed development is intended to provide for a vibrant and diverse community, while delivering a connected residential neighbourhood which knits in to both the established and the emerging residential developments in the area. High-quality landscaping and public realm, with a focus on the creation of distinctive character areas is proposed. A new street will run east-west across the north of the site and the creation of a new public space at the heart of the proposed scheme will connect to a publicly accessible linear park along the canal to the south. Permeability is a key feature of the proposed pedestrian realm, linking a mix of dedicated and shared surface areas through the site with an amenity strip along the Grand Canal Linear Park.



Figure 1: Extract of Site Layout Plan prepared by OMP.

1. Introduction

1.1 Introduction

This Planning Report, including Statement of Consistency, has been prepared by Avison Young on behalf of the Applicant. The purpose of this Report is to support a planning application by U and I (White Heather) Limited for a Strategic Housing Development (SHD) at the White Heather Industrial Estate, South Circular Road, Dolphins Barn, Dublin 8; 307/307a South Circular Road, Dublin 8; and 12a St. James's Terrace, Dublin 8. The Report will also inform the Board of all relevant material planning considerations arising in relation to the proposed SHD and to assist the Board in its determination of the application.

The planning application is made directly to the Board pursuant to the provisions of section 4 of the 2016 Act, as the proposed development falls within the statutory definition of "Strategic Housing Development", namely, *"the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses"* (per section 3 of the 2016 Act).

The planning documentation for the SHD application has been prepared by an experienced Design Team comprising:

- Avison Young
- O' Mahoney Pike Architects (OMP)
- Liv Consultants
- Modelworks
- AWN Consulting (AWN)
- O'Connor Sutton Cronin (OCSC)
- Ruth Minogue & Associates
- Systra
- In2
- Bernard Seymour Landscape Architects (BSLA)
- Joe McConville + Associates
- IAC
- ARC Architectural Consultants (ARC)

Following pre-application consultations with Dublin City Council under section 247 of the 2000 Act and with the Board under section 5 of the 2016 Act, this application has been made directly to the Board and complies with the requirements of the SHD Regulations.

The subject site comprises the White Heather Industrial Estate on the South Circular Road, as well as 307/307a South Circular Road and 12a St. James's Terrace. Pursuant to Variation No. 23 of the Dublin City Development Plan 2016–2022, which was adopted in March 2020, the White Heather Industrial Estate was rezoned from Zoning Objective Z6 – *'to provide for the creation and protection of enterprise and facilitate opportunities for employment creation'* to Zoning Objective Z1 – *'to protect, provide and improve residential amenities'* (1.236 ha) and Zoning Objective Z9 – *'to preserve, provide and improve*

recreational amenity and open space and green networks' (0.228 ha). Accordingly, the site of the proposed development (c. 1.535 ha.) is predominantly zoned under Zoning Objective Z1 with a small section falling under Zoning Objective Z9.

The proposed scheme will provide 335 no. Build to Rent residential units, including 7 no. townhouses, 6 no. duplex units, 2 no. cafés, 1 no. childcare facility, 1 no. concierge facility, and ancillary residential facilities including a new linear canal-side park which will be publicly accessible. The proposed development at White Heather represents an opportunity to create and open up a new public space along the Grand Canal frontage, which is currently inaccessible. The site is in close proximity to extensive local amenities, transport links and several major employment centres and the proposed development will result in a sustainable high-density landscaped urban neighbourhood with a new public open space area and canal-side amenity.

This Planning Report outlines the site location and context, the relevant planning history, details of pre-application consultations with Dublin City Council and An Bord Pleanála, a description of the proposed development, and a statement of consistency with national, regional and local planning policy. This Planning Report also provides a reference to where relevant information is contained within the planning application package.

A number of pre-application meetings have taken place with Dublin City Council prior to submitting this application and details of these meetings are outlined in Section 4 of this Report.

The proposed Strategic Housing Development has been prepared in accordance with the requirements of the relevant section 28 Guidelines.

The applicant accepts that conditions will be applied in the granting of permission requiring the development to remain owned and operated by an institutional entity for at least 15 years and that no individual unit are sold for that period.

This Report should be read in conjunction with the accompanying detailed documentation submitted as part of this SHD application and those documents include:

- Strategic Housing Development Application Form;
- Cover Letter prepared by Avison Young;
- 3 no. CDs comprising a digital copy of the full planning documentation;
- Environmental Impact Assessment Report prepared by Avison Young in consultation with the EIAR team;
- EIAR Portal Confirmation Notice;

- Response to An Bord Pleanála's Opinion prepared by Avison Young in consultation with the Design Team;
- Architectural Drawings including Site Location Plan and Site Layout Plans prepared by OMP;
- A3 booklet of all drawings;
- Landscape Masterplan, Design Rationale and associated drawings prepared by BSLA;
- Life Cycle Report;
- BTR Operational Management Plan;
- BTR Justification Report;
- Planning Report including Statement of Consistency;
- Social and Community Infrastructure Audit;
- Material Contravention Report;
- Supplementary Daylight/Sunlight and Overshadowing Report;
- Daylight & Sunlight Assessment (contained within EIAR);
- Architectural Design Statement;
- Part V Report;
- Technical Report;
- Engineering Services Report;
- Outline RWMP;
- Outline Construction Management Plan;
- Flood Risk Assessment;
- Operational Waste Management Plan (contained within EIAR);
- Transport Impact Assessment;
- Mobility Management Plan;
- Mechanical & Electrical Report;
- Site Lighting Plan;
- Energy Statement;
- Wind Analysis;
- Arboricultural Impact Assessment;
- Tree Protection Plan;
- Tree Constraints Plan;
- Visual Impact Assessment (contained within EIAR);
- Conservation/Architectural Heritage Assessment Report (contained within EIAR);
- Photomontages; and
- CGI's.

2. Site Location and Context

This Section provides an outline of the location and context of the subject site including a description of the site's physical features, existing uses and an overview of the existing community infrastructure serving the subject site. The overall site area for the proposed development, depicted by the red line boundary on the Site Location Plan and the associated suite of drawings, is c. 1.535 ha.

There is a strip of land along the length of the canal frontage which was subject of rezoning under Variation No. 23 and which is not in the ownership of the Applicant (under the ownership of Waterways Ireland) and therefore, does not form part of the proposed SHD scheme. Positive engagement with Waterways Ireland has been held with the Applicant and provisions have been made for Waterways Ireland to access the canal for maintenance purposes etc. through the development site. Future public through access to the canal and links between the development site and potential future greenway/cycleway along the canal bank can be discussed with Waterways Ireland as appropriate.



Figure 2: Site Location (approximate subject site boundary identified in red). Base image source: Google Maps.

2.1 Site Location

The White Heather Industrial Estate is located on the South Circular Road at Dolphin's Barn, Dublin 8. The site is bound by residential properties situated on the South Circular Road to the north, Priestfield Cottages to the east and St. James's Terrace to the west. The Grand Canal runs parallel to the south of the site, with the application site bound by a linear strip of 'open space' along the length of the canal

bank. Our Lady of Dolour's Church is situated to the north-west of the site, with local retail/commercial uses located to the south-west of the site.

The subject site currently has two access points: one from the South Circular Road accessing the majority of the White Heather Industrial Estate; and one of St James's Terrace providing access to one industrial unit (12a St. James's Terrace). There is currently no access to the site from the Grand Canal.

The subject site is situated just over 2km from Dublin City Centre. The site is approximately 2.3km from St. Stephen's Green, 0.5km from the Coombe Women's Hospital, 1.6km from St. James's Hospital, 1.9km from Heuston Station, 800m from Fatima Luas Stop and 2.2km to Christ Church Cathedral.

While the immediate surrounding land uses are generally residential, the wider vicinity provides local retail, commercial, medical, community and recreational uses. The locality is well served by sustainable modes of transport with frequent bus and Luas connections, with adequate capacity to the City Centre.

There are a number of Dublin Bus routes which serve the subject site including *inter alia* the 17, 17d, 27, 56a, 68, 68a, 77a, 77x, 122, and the 151. Additionally, the South Circular Road is identified as an Orbital Route under the proposed Bus Connects Scheme, while the D-Spine is proposed to run through Dolphin's Barn with a peak frequency of 4 mins between buses. The Dolphin's Barn Road is also identified as a Core Bus Corridor under the proposed Bus Connects Scheme. The Fatima Luas stop is approximately 800 metres to the north and Rialto Luas stop approximately 1km to the north-west of the subject site. Both stops are on the Luas Red Line with links Connolly Station/The Point to Tallaght Square/Saggart. The Red Line also links to the Luas Green Line at Abbey Street which connects Broombridge to Brides Glen. The nearest Dublin Bike Scheme Station to the subject site is approx. 1km away or a c. 15 min walk.



Figure 3: Aerial of subject site including surrounding context.

2.2 Site Description

The subject site comprises the White Heather Industrial Estate, acquired by the Applicant, U and I (White Heather) Limited. It consists of a small-scale industrial estate located off the South Circular Road. Additionally, the proposed development comprises No. 307/307a South Circular Road, a residential dwelling, and 12a St. James's Terrace, a vacant industrial unit. The subject site is of an irregular shape, with boundaries to the South Circular Road, the Grand Canal, St. James's Terrace, Priestfield Cottages and Our Lady of Dolour's Church.

The site comprises a number of industrial units and associated parking and storage areas. There is minimal existing landscaping on the site however, adjacent to the Grand Canal there is a strip of flat grass area running the length of the site. The existing structures on the site comprise industrial units (approx. two storeys in height). The existing units are generally located on the boundary lines of the site on all side, with the centre of the site remaining free from development and in use as ancillary parking for the industrial units.

2.2.1 Current Uses

The site currently comprises a number of small-scale industrial/warehouse units, with ancillary car parking and storage areas. Businesses occupying units within the Industrial Estate include: An Post Dublin 8 Delivery Office; BSS Dublin; and Storage World Self Storage. No. 307/307a South Circular Road is currently in residential use.

2.2.2 Adjacencies

The subject site is bound by residential lands to the west, north and east, and is partially bounded by the District Centre zoned land located at the Dolphin's Barn Bridge junction adjacent and west of the subject site. Our Lady of Dolour's Church is located to the north of the site and is a Protected Structure (RPS No. 1849). The subject site is partially located within the Conservation Area covering the Grand Canal. Additionally, there is a Zone of Archaeological Interest identified to the north of the subject site along Dolphin's Barn Road.

2.2.3 Community Infrastructure

A catchment area comprising a c. 1km radius extending outwards from the site was used for the purpose of establishing the existing community infrastructure facilities in the vicinity. The site is well served by community and social infrastructure including transport, schools, medical facilities, childcare facilities, as well as general retail services such as shops, bars and restaurants. Of note, the Coombe Women's & Infants University Hospital, St. James' Hospital, and the National Stadium are all located within the site's catchment.

Table 1 below outlines the existing community infrastructure serving the area and the future residents of this proposed residential development.

Category	Existing Infrastructure
Retail Services	Supermarkets: Tesco Express; Lidl; Dunnes Stores. General Retail/Take-away: Centra; Spar; Londis; Subway; Camile Thai; New Curry And Grill; Bulgarian Food Store; Pen Tower Chinese & Thai Take-Away; Ginos Take Away; Bimdoc African Food Store; Danube Shop; Original Ex-Yu Food; To Tu; Forte Takeaway Foods; Marlowe & Co; Happy News & Booze; St.James Hospital Stores; Park Shopping Mall; B-Q; Applegreen Service Station; Maxol Filling Station. Public Houses/Cafes: Lam Inn; Lowes Pub; The Barn House Pub; Cafe du Jour; Morrissey's Pub; Phoenix Café; Sunflower Café; Crumlin College Café; Amber Grill; The Other Hand; Daddy's Café; Coke Lane Pizza; Rose Garden; The Bird Flanagan.
Creche/Childcare	Loreto Preschool Crumlin; Kiddies Korner; Creative Kids and Co; Stepping Stones; Pearse College Community Nursery; Marist Creche; Sherpa Kids Griffith Barracks Multi Denominational School; Dolphin House Homework Club; Children's Centre/Rialto Community Drug Team; SICCD Afterschool-Warrenmount PPS; Child's Play; Tir na nOg Early Childhood Development Service; St Joseph's ECDS; Mery Family Centre LTD; Fatima Homework Club; Le Cheile Sophia Nurturing Centre Cork Street; Whitefriars Preschool and Afterschool.
Education	Presentation Secondary School; St Catherine's National School; Scoil Treasa Naofa; Leinster School of Music and Drama; Griffith College; Marist National School; Pearse College of Further Education; St. Kevin's College; Mater Dei National School; Loreto College Crumlin; St. James' Primary School; Christian

	Brothers Secondary School; Canal Way Educate Together National School; Liffey College; Crumlin College of Further Education; Scoil Iosagain.
Healthcare/Social Services	Coombe Women's Hospital; Brú Chaoimhín; Our Lady's Hospice; Bellvilla Community Unit for Older Persons; St. James's Hospital; Eldon Family Practice; South Circular Road GP Clinic; Kilmainham Medical Centre; Thomas Court Medical Centre; Sundrive Medical Centre; St. Glady's Nursing Home.
Community	Our Lady of Dolour's Church; Rialto Parish Roman Catholic Church; St. Teresa's Church; Dublin Mosque; Donore Youth and Community Centre; ICRM Redeemer Church Dublin; Liberty Church; Luke's Church; Mount Argus Church; St. Bernadette's Church; Crumlin Community Development Project; Fr. Lar Redmond Community Centre; The Universal Church; Dolphin House Community Centre; South Circular Road Scout Centre.
Cultural	Guinness Storehouse St. James' Gate; Teeling Whiskey Distillery.
Open Space/Recreation	The National Stadium (Boxing); St Teresa's Park; Oscar Square; Argus Park; Mount Jerome; Sundrive Velodrome; Eamonn Ceannt Park & Playground; Lourdes Celtic F.C.; Clogher Road Sports Centre; Brickfield Park; Liberty Saints Rugby Club; Herberton Leisure; Fatima Boxing Club; Flanagan's Fields Community Garden; St. Catherine's Community & Sports Centres; Templeogue Synge St GAA Grounds; Kevin's GAA Club; St John Bosco FC; St James Gaels; Grand Canal.

Table 1: Existing Community and Social Infrastructure in the Catchment Area.

A Community & Social Infrastructure Audit accompanies this application, however, the local community infrastructure surrounding the subject site can be summarised in the following points:

- The subject site is located proximate to numerous high frequency public transport links including Dublin Bus and Luas.
- The site is well served by primary and secondary schools in the catchment area. There are a number of childcare facilities located in the immediate catchment site providing a range of childcare services, while a proposed childcare facility is included in the subject application.
- There are a number of sports clubs and recreational amenities in the surrounding area including the Grand Canal.
- There is a range of shops, bars, restaurants and other local services located nearby in Dolphin's Barn and within walking distance of the subject site.

3. Planning History

3.1 Planning History at the Subject Site

This Section provides an overview of the planning history at the subject site and was undertaken through the Planning Authority's online planning portal. Table 2 provides an overview of the relevant planning history, while a summary of each application is also provided in the sections that follow.

Reg. Ref. No.	Applicant	Location	Description	Decision	Appeal
2458/10	An Post (Group Property)	White Heather Industrial Estate, Units 291-293, South Circular Road, at its junction with Priestfield Cottages, Dublin 8	Development of a postal delivery service unit on a circa 0.222ha site. The development comprises the amalgamation and change of use of the two existing light industrial/warehouse units to accommodate an An Post delivery service unit and 209sqm additional ancillary accommodation internally including offices and welfare facilities. The proposal will result in: - Alterations to the north and east elevations including new doors, windows, canopies and signage. The provision of a single storey external store for 30. No bicycles tree planting and landscaping along the eastern and southern boundaries of the site 25no. off street car parking spaces. Repairs and renewal of existing hardstanding areas and roof and wall fabric. New security railings and gates including the provision of architectural railings above the existing stone-faced wall to the eastern boundary and block wall to the southern boundary to give an overall height of 2.7m signage to main entrance.	Final Grant 22/06/2010	N/A
4236/09	Hilton Pasley and Co Ltd	White Heather Industrial Estate, 293-307, South Circular Road, Dublin 8	Planning permission is sought for the installation of new pedestrian and vehicular access gates at the front entrance.	Final Grant 16/02/2010	N/A
2316/07	Hilton Pasley and Co Ltd	White Heather Industrial Estate, 293-307, South Circular Road, Dublin 8	Demolition of one existing warehouse and sheds and the construction of two new warehouse / light industrial units, with associated parking unit A comprising 904sqm of warehouse / light industrial space with 302 sqm of offices on three floors, Unit B comprising 718 sqm of Warehouse / light Industrial Space with 156 sqm of offices on two floors and 65.5 sqm estate management store.	Final Grant 11/09/2007	N/A
1287/00	Hilton Pasley and Co Ltd	293 South Circular Road, Dublin 8.	Construct 3.0 metre high palisade fence to the south boundary.	Final Grant 07/12/2000	N/A
2433/98	Mr. J. Ryan	Rear 12A St. James Terrace, Dolphins Barn, Dublin 8	Company sign.	Permission Refused 14/12/1998	N/A

Table 2: Planning History of Subject Site.

3.1.1 Reg. Ref. No. 2458/10

Permission was granted in June 2010 for the amalgamation and change of use of two existing light industrial/warehouse units to accommodate an An Post Delivery Service Unit and 209sqm additional ancillary accommodation including offices and welfare facilities. The decision to grant was subject to 6

no. conditions in relation to *inter alia* drainage and water services, construction hours and the undertaking of clean and safe construction works. There were no appeals, either first or third party, made to An Bord Pleanála.

3.1.2 Reg. Ref. No. 4236/09

Permission was granted in February 2010 for the installation of a new pedestrian and vehicular access gate at the front entrance of the White Heather Industrial Estate on the South Circular Road. The decision to grant was subject to 4 no. conditions in relation to *inter alia* compliance with Codes of Practice in respect of Water, Drainage, Roads, and Noise & Air Pollution, construction hours and the undertaking of clean and safe construction works. There were no appeals, either first or third party, made to An Bord Pleanála.

3.1.3 Reg. Ref. No. 2316/07

Permission was granted in September 2007 for the demolition of one existing warehouse and the construction of two new warehouse / light industrial units, with associated parking. The decision to grant was subject to 8 no. conditions in relation to *inter alia* consultation with Waterways Ireland, drainage and water services, site construction hours, compliance with Codes of Practice in respect of Drainage, signage, development contributions and the undertaking of clean and safe construction works. There were no appeals, either first or third party, made to An Bord Pleanála.

3.1.4 Reg. Ref. No. 1287/00

Permission was granted in December 2000 for the construction of a 3-metre-high palisade fence to the southern boundary of 293 South Circular Road. The decision to grant was subject to 3 no. conditions in relation to *inter alia* the retention of the existing southern boundary wall, materials, and landscaping works and maintenance. There were no appeals, either first or third party, made to An Bord Pleanála.

3.1.5 Reg. Ref. No. 2433/98

Permission was refused in December 1998 for a new advertising sign to the rear of the unit at 12a St James's Terrace as the proposed advertising sign contravened the policies and objectives as set out in the 1991 Dublin City Development Plan.

3.2 Relevant SHD Schemes on South Circular Road

There have been two recent SHD applications in the vicinity of the subject site, along the South Circular Road: the Bailey Gibson and Player Wills sites. These two sites are subject of a Masterplan and are within Strategic Development & Regeneration Zone 12 under the Dublin City Council Development Plan 2016-2022.

3.2.1 Bailey Gibson

The former Bailey Gibson site at Nos 326-328 South Circular Road, which is located a short walking distance from the subject site to the north-east, was granted planning permission by An Bord Pleanála in September 2020 for a Strategic Housing Development comprising a total of 416 no. residential units (412 no. Build To Rent apartments and 4 no. townhouses) and along with retail, financial/professional, health and community uses under Board Ref. 307221. The permitted residential apartments are accommodated within 5 no. blocks ranging in height from 2 no. to 16 no. storeys.

In its decision, the Board concluded that the Bailey Gibson site has excellent public transport accessibility, that the tallest part of the proposal is located to the centre and east of the site and incorporates stepped heights to transition the scale to the more sensitive areas adjacent to the site. The Board was satisfied that the needs of the local population would be better served through the provision of a new public park, playground and playing pitches on adjoining Dublin City Council lands and that a financial contribution in lieu would be applicable.

This permission is currently subject of judicial review proceedings.

3.2.2 Player Wills

Adjacent to the Bailey Gibson site is the former Player Wills Factory site on the South Circular Road, Dublin 8, which has been granted planning permission by An Bord Pleanála in April 2021 for a Strategic Housing Development comprising a total of 732 no. Build to Rent residential units (492 no. apartments and 240 no. single occupancy shared accommodation private living spaces) with a mix of community, co-working, social, cultural and retail (inc. food and beverage) uses distributed across 4 no. buildings. The permitted development ranges in height from 2 no. to 19 no. storeys.

In its decision, the Board concluded that the proposed Player Wills development would constitute an acceptable *quantum* and density of development in an accessible urban location, would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and *quantum* of development and would be acceptable in terms of pedestrian safety.

This permission is currently subject of judicial review proceedings.

3.3 Planning History Summary

A review of the planning history at the subject site has shown that these lands have previously only been in use for industrial/warehouse related uses. However, the recent zoning change on the subject lands to Z1 Residential by DCC in March 2020 was made to enable the more efficient use of these urban lands for residential development, being well served by public transport.

4. Pre-Application Consultations

The Applicant and Design Team held 4 no. pre-application consultation meetings with Dublin City Council (DCC) under section 247 of the Planning and Development Act on the following dates:

- 19th October 2020;
- 6th January 2021;
- 1st March 2021; and
- 20th May 2021.

Furthermore, subsequent to the request to enter into pre-application consultations with the Board under section 5 of the 2016 Act in September 2021, with the tri-partite meeting taking place online on 29th November 2021.

The following section provides a summary of the pre-application consultations held with the Planning Authority and An Bord Pleanála, including key issues raised and the response of the design team on foot of the pre-application discussions.

4.1 DCC Pre-App Meeting No. 1

The first consultation with the Planning Authority took place on 19th October 2020. Mary Conway, Rhona Naughton and Liam Currie of DCC were present, while Arlene Van Bosch (U+I); Brian Maher and Heather McMeel (Avison Young); Orlaith O'Callaghan, Michael Hussey and Georgy Daly (OMP); and Bernard Seymour (BSLA) were in attendance on behalf of the Applicant and Design Team. A pre-application design booklet, prepared by OMP in consultation with other consultants on the project, was presented to DCC. This booklet provided information relating to the planning policy context, site context, site layout and location, proximity to local services, site access, massing, building height and how the design team arrived at the preferred scheme.

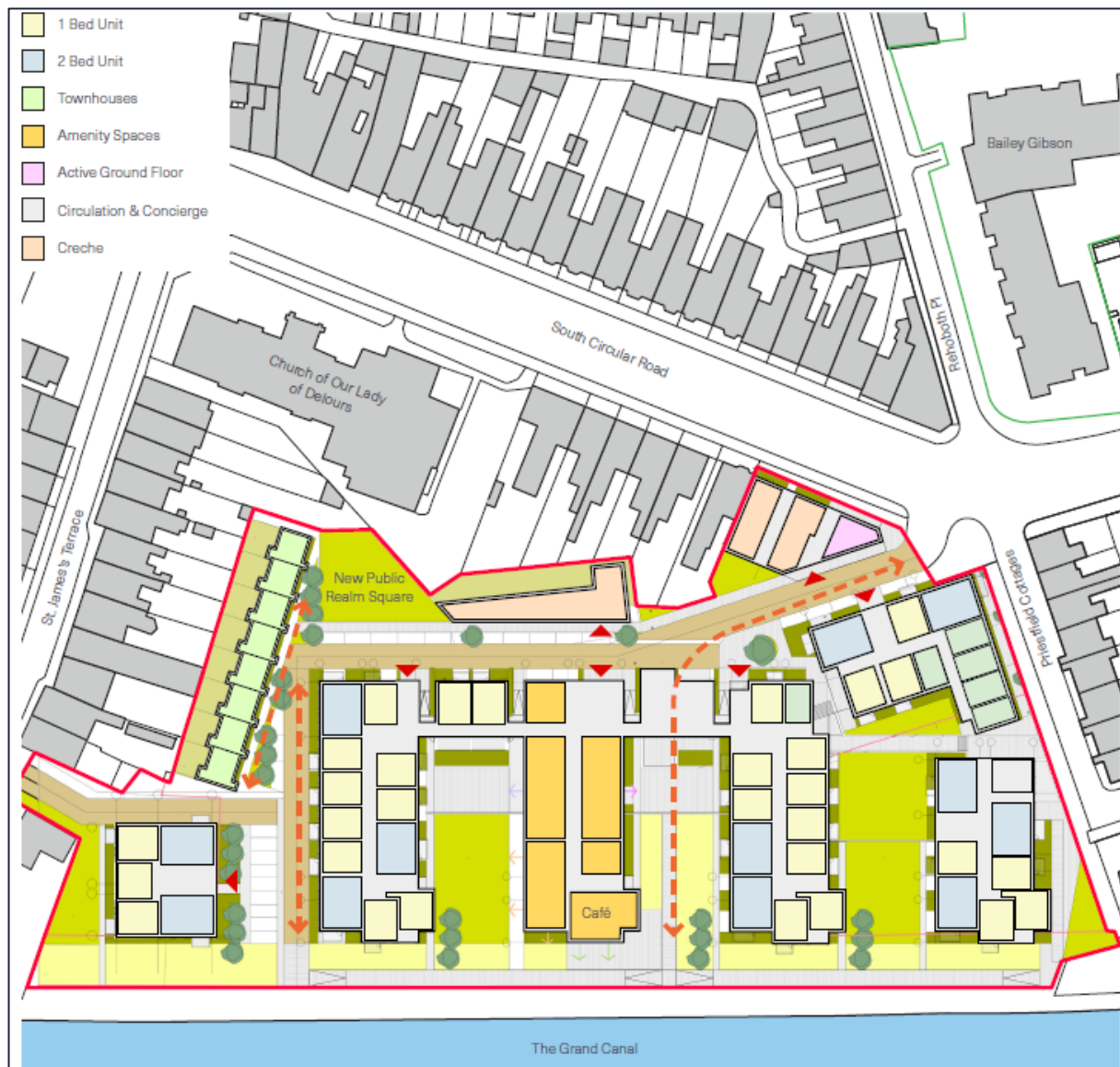


Figure 4: Extract from Pre-App Meeting No. 1 Presentation – indicative site layout.

4.1.1 Overall View

The Planning Authority were of the view that the subject site has been rezoned for residential use and therefore, DCC stated that they had no objection, in principle, to the proposed residential development at this location. DCC stated that the onus was on the Applicant to show that the site can carry the quantum of development being proposed and a further level of detail for the scheme was requested from DCC to include daylight/sunlight analysis, sections and dimensioned site plans, along with visual impact assessment in terms of heights.

4.2 DCC Pre-App Meeting No. 2

The second consultation with the Planning Authority took place on 6th January 2021. Mary Conway and Liam Currie of DCC were present, while Arlene Van Bosch (U+I); Brian Maher, Mark Feighery and Heather McMeel (Avison Young); Orlaith O'Callaghan, Michael Hussey and Eva Llorente (OMP); Bernard

Seymour and Derek Naughton (BSLA); and Bill Hastings (ARC) were in attendance on behalf of the Applicant and Design Team. A pre-application design booklet, prepared by OMP in consultation with other consultants on the project, was presented to DCC. This booklet provided updated information on the proposed development relating to site layout, block configuration, pavilion features, landscape and open space, apartment typologies, detailed schedules of accommodation and next steps relating to massing as requested from DCC at the first pre-planning meeting.

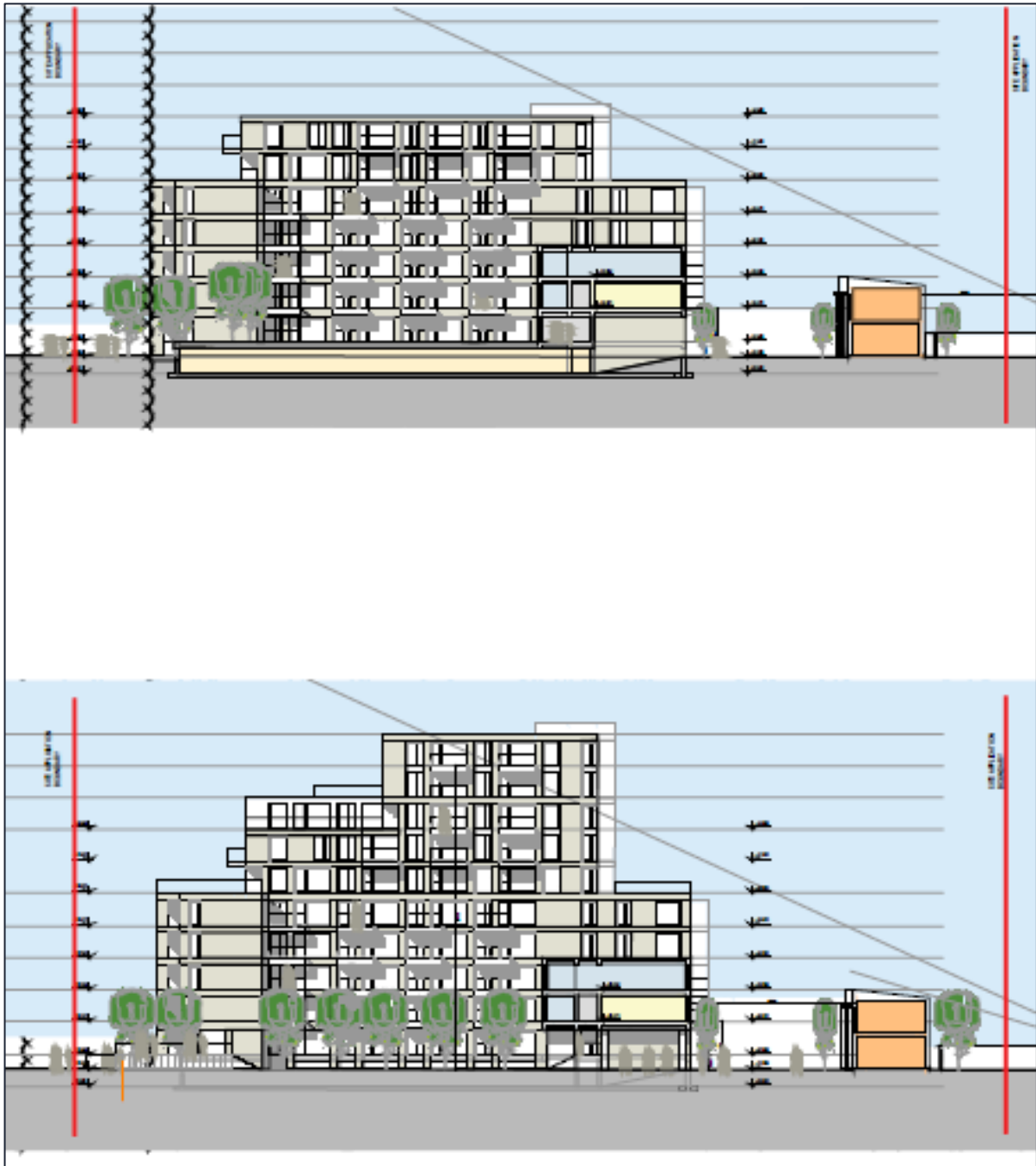


Figure 5: Extract from Pre-App Meeting No. 2 Presentation – indicative elevations.

4.2.1 Overall View

The Planning Authority were of the view that the subject site has been rezoned for residential use as it is a good location in terms of accessibility to the City Centre and in relation to the potential to open the canal for amenity use. However, DCC outlined that the onus is on the design team to meet residential standards and standards for amenity, quality public realm and open space requirements and in this regard, DCC outlined that while they support the general principles of the development as presented, further detail is required to fully assess the proposed scheme.

DCC requested that further detail of the proposed development will be required to include:

- *Detailed floorplans - to ensure residential standards are met;*
- *More clarity in relation to communal and public open spaces – including public/private separation, quality and dimensioned drawings;*
- *More detail on massing and height - in the context of proposed amenity provided, the canal and the church; and further elevational work required to help break down the massing bulk;*
- *More detail on the impact of daylight/sunlight on adjacent properties and amenity;*
- *More detailed cross sections through the site; and*
- *Additional viewpoints to be included.*

4.3 **DCC Pre-App Meeting No. 3**

The third consultation with the Planning Authority took place on 1st March 2021. Mary Conway and Liam Currie of DCC were present, while Arlene Van Bosch (U+I); Brian Maher, Mark Feighery and Brendan Boyle (Avison Young); Orlaith O'Callaghan, Michael Hussey and Eva Llorente (OMP); Derek Naughton (BSLA); and Bill Hastings (ARC) were in attendance on behalf of the Applicant and Design Team. A pre-application design booklet, prepared by OMP in consultation with other consultants on the project, was presented to DCC. This booklet provided updated information relating to block configuration, landscaping, public realm and open space, and massing as requested from DCC at the second pre-planning meeting.

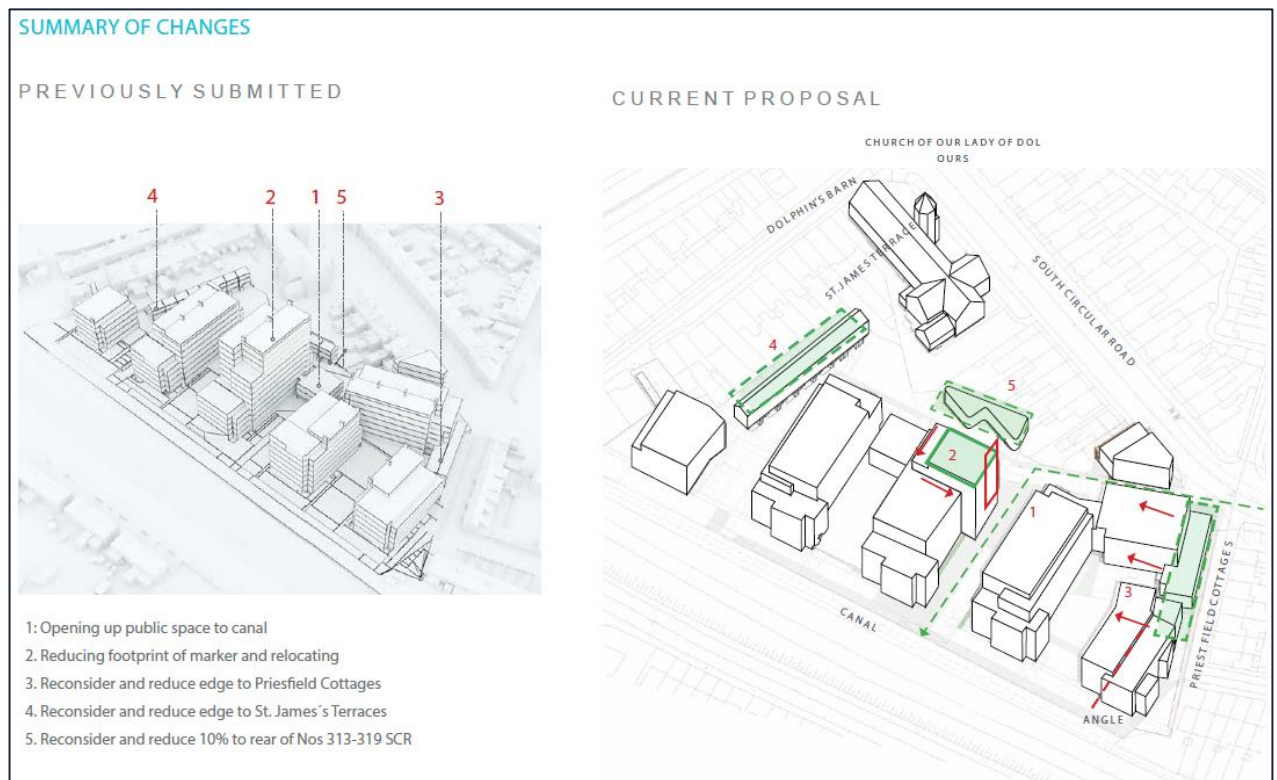


Figure 6: Extract from Pre-App Meeting No. 3 Presentation – scheme changes.

4.3.1 Overall View

The Planning Authority acknowledged the updates and modifications to the proposed scheme from the previous pre-planning meeting held. DCC advised that the principle of the development was accepted however, revised views of the proposed scheme will need to be reviewed by DCC in respect of the proposed height/visual impact and that updated information on the daylight/sunlight work undertaken to date is required. In this regard, further detail in respect of daylight/sunlight and visual impact was forwarded by email to DCC in April 2021.

4.4 DCC Pre-App Meeting No. 4

The fourth consultation with the Planning Authority took place on 20th May 2021. Mary Conway and Liam Currie of DCC were present, while Arlene Van Bosch (U+I); Brian Maher, Mark Feighery and Heather McMeel (Avison Young); Orlaith O'Callaghan and Michael Hussey (OMP); and Bill Hastings (ARC) were in attendance on behalf of the Applicant and Design Team. Updated visuals and modelling information, as well as the Sunlight/Daylight analysis undertaken for the proposed scheme were sent to DCC prior to the pre-application meeting. Changes had been made to the scheme design in respect of the comments received from the third pre-application meeting with DCC and these were run through at this meeting.

4.4.1 Overall View

The Planning Authority acknowledged the updates and modifications to the proposed scheme in terms of visual impact, materials and massing. However, DCC advised they had reservations in respect of the 10-no. storey element of the proposed scheme and the results from the daylight/sunlight assessment. The Project Team outlined the series of alterations made to the proposed scheme in order to lesson any potential impact, including the redesign of the Block along Priestfield Cottages.

4.5 **Post Pre-App Meeting No. 4**

Following the pre-application meeting an exercise was undertaken to consider the alternative height and massing as discussed. The changes which were considered include the option to reduce the height of Block 04 by 1 floor to 7-storeys and reduce the feature frame to Block 03 while also changing its materials/finish. This information was subsequently forwarded by email to Dublin City Council and included were the key map, baseline views, the design option presented at Pre-App Meeting No. 4 and the amended design option for each of the following views;

- View 01: Crumlin Road at Rutland Avenue;
- View 03: South Circular Road at Dolphin Avenue;
- View 10: Dolphin's Barn Street/Cork Street at The Coombe Hospital; and
- View 14: Rathdrum Road.

These views and the accompanying alternate axonometric views were included in the information forwarded. These changes are further set out in the OMP Architectural Design Statement included with this application.

4.6 **Tri-Partite Meeting on 29th November 2021**

The tripartite meeting under section 5 of the 2016 Act took place online on 29th November 2021. Stephen O'Sullivan, Fiona Fair and Helen Keane of An Bord Pleanála were present, with Liam Currie, Heidi Thorsdalen and Kieran O'Neill of DCC also present. On behalf of the applicant, the attendees included Arlene Van Bosch (U+I); Brian Maher and Mark Feighery (Avison Young); Michael Hussey (OMP) and Andrew Archer (Systra).

The agenda for the meeting comprised of discussions regarding the Architectural Design Approach including height, scale, massing and visual impact; Residential Amenity including sunlight and daylight, distances to boundaries and quantum of open space; Deliverability and connectivity to the Canal; Responses to issues raised in the CE Report; and any other matters.

4.7 An Bord Pleanála Opinion on Pre-Application Consultation

Following the Pre-Application Consultation held online on 29th November 2021 with representatives from An Bord Pleanála, Dublin City Council and the Applicant, the Board issued a Notice of Pre-Application Consultation Opinion on 7th December 2021 which stated that:

“An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.”

The Applicant was also notified of the requirement to submit specific further information, subject to article 285(5)(b) of the SHD Regulations. A detailed response to these requirements is provided in the “Response to An Bord Pleanála Opinion” document prepared by the Design Team and submitted with this application.

4.8 Pre-Application Consultation Summary

The design of the proposed development has involved an iterative process having regard to the site context and development management standards. Comments from the planning authority and the Board, made in the context of the statutory pre-application consultations, has also directly informed the progression of the design and layout.

5. Description of Proposed Strategic Housing Development

5.1 Overview of Development

The proposed strategic housing development comprises a 1.535ha site, at White Heather Industrial Estate, South Circular Road, Dolphin's Barn, Dublin 8 and including a residential dwelling at 307/307a South Circular Road, Dublin 8 and an industrial building at 12a St James Terrace, Dublin 8. The site is bounded by The Grand Canal to the south, Our Lady of Dolour's Church, and private rear gardens to residential dwellings on South Circular Road to the north, Priestfield Cottages to the east and rear gardens to residential dwellings on St James's Terrace as well as an access point to the public road to the west.

The development will consist of:

- 1) The demolition of all existing buildings on site except 307/307a South Circular Road including industrial storage warehouses and office buildings comprising a total of c. 6,604 sq. m. floorspace;
- 2) A mixed residential and commercial development with a total floorspace of c. 30,242 sq. m. Total proposed residential floorspace is c. 26,119 sq. m. and consists of a total of 335 no. Build to Rent residential units including Part V provision as follows:
 - A terrace of 7 no. 3-storey 3 bed townhouses,
 - Block B01 (5 storeys) comprising 24 no. units (14 no. 1 bed units and 10 no. 2 bed units),
 - Block B02 (5–7 storeys) including a link to Block B02A (5-storeys) comprising 84 no. units (56 no. 1 bed units and 28 no. 2 bed units),
 - Block B03 (5-10 storeys) including 77 no. units (48 no. 1 bed units and 29 no. 2 bed units) and Resident's Amenity (c. 1,001 sq.m) with main entrance hall, Concierge/Management Office at undercroft and ground floor, Gym, Events Suite and a 'Canal Café' at ground floor level, Co-Working/Lounge, Cinema/Media Room, Dining/Kitchen area and access to an external roof terrace at fifth floor level (Level 05),
 - Block B04 (5-7 storeys) comprising 72 no. units (48 no. 1 bed units and 24 no. 2 bed units),

- Block B05 (5 storeys) comprising 10 no. units (6 no. 1 bed units and 4 no. 2 beds) with a café unit (c. 46 sq. m) at ground floor level,
 - Block B06 (2-5 storeys) comprising 29 no. units (2 no. studio units, 7 no. 1 bed units, 14 no. 2 bed units and 4 no. 2 bed duplex units and 2 no. 3 bed duplex units),
 - Block B07 (3-5 storeys) comprising 32 no. units (17 no. 1 bed units and 15 no. 2 bed units),
- 3) 1 no. 2-storey Childcare Facility / Creche (c. 260 sq. m);
- 4) A total of (c. 2,960 sq. m) Public Open Space landscaped and broken into 7 no. distinct character areas and linking through Canal Square, a Pedestrian Priority Street between Blocks B03 and B04 to a publicly accessible landscaped Linear Park along the Grand Canal within the Z9 Amenity/Open Space Lands;
- 5) Communal Open Space of c. 2,160 sq. m made up of c. 1,560 sq. m at ground floor and c. 600 sq. m on roof terraces;
- 6) The proposed Part V provision of 34 no. units and 10% of the total units are proposed to be provided at Block B01 and Block B05 as 20 no. 1 bed units and 14 no. 2 bed units;
- 7) 106 no. car parking spaces are provided with 41 no. car parking spaces at grade, including 5 no. parking spaces within the curtilage (carports) of townhouses, and 65 no. car parking spaces at undercroft area (c. 1,890 sq. m) with lobbies linking to Blocks B02 and B03 entrance lobbies, cycle parking storage areas, staff area, refuse store areas and plant areas;
- 8) 558 no. cycle spaces at surface (352 no. spaces) and undercroft level (206 no. spaces) of which 491 no. are secure bicycle spaces (3 no. of which are cargo spaces) and 67 no. are visitor spaces (5 no. of which are cargo spaces);
- 9) Realignment and improvement works to the existing entrance junction on South Circular Road and the existing entrance to Priestfield Cottages to provide road markings, footways and formal uncontrolled crossing points;
- 10) Works to surface treatments to provide pedestrian and cycle access only to the existing entrance at St James's Terrace;
- 11) A change of use of the existing 2-storey residential units 307/307a South Circular Road from residential to shared workspace/office space (c. 165 sq. m);

12) 3 no. electricity sub-stations in blocks B02, B03 and B04; and

13) All enabling and site development works, hard and soft landscaping, public realm works, public art, lighting, services and connections, waste management and all other ancillary works.

This Report contains a statement setting out the manner in which the proposal will be consistent with the objectives of the Dublin City Development Plan 2016-2022. The application documentation also contains a Material Contravention Statement demonstrating the manner in which permission may be granted for the proposed development, having regard to the criteria specified in section 37(2)(b) of the 2000 Act, notwithstanding that the proposed development materially contravenes certain provisions of the Development Plan, other than in relation to the zoning of the land.

An Environmental Impact Assessment (EIAR) and an Appropriate Assessment Screening Report (AASR) have been prepared in respect of the proposed development.

5.1.1 Apartment Units

The proposed strategic housing development provides for 328 no. Build to Rent apartment Units across 7 no. blocks, ranging in height from 2 no. to 10 no. storeys. The apartment blocks have been designed to vary in height having regard to the site context and visual impact, with height tapering down from the centre of the site to the boundaries. The use of finger blocks arranged in a north-south direction enable the site to take advantage of southern aspect and allows for a physical and visual link to the Grand Canal. Duplex units are proposed adjacent to Priestfield Cottages. The range of apartment units include a mix of studio, 1-bedroom, 2-bedroom, 2-bedroom duplex and 3-bedroom duplex.

5.1.2 Townhouses

The proposed development includes 7 no. 3-bedroom townhouses situated at the northwest portion of the subject site, backing on to the adjacent dwellings on St James's Terrace and south of Our Lady Dolour's Church. 5 no. townhouses include car ports for car parking, with the remaining 2 no. townhouses provided parking at surface level.

Please refer to the Architectural Design Statement and Technical Report submitted with this application for further detail on the proposed dwelling types.

5.1.3 Open Space/Landscape Strategy

A comprehensive Landscape Design Rationale and associated drawings prepared by Bernard Seymour Landscape Architects accompany this Report. The proposed development will deliver a landmark new

urban neighbourhood in a distinctive landscaped canal-side park setting. Please refer to the Landscape Report submitted with this application for further detail.

5.1.4 Access and Movement

The primary access to the lands will be from the South Circular Road, the existing site entrance will be upgraded and enhanced. This access will provide for vehicular traffic. A separate pedestrian only access is provided to the south-west of the site at St. James's Terrace. Please refer to the Mobility Management Plan submitted with this application for further detail.

5.1.5 Design Rationale

The proposed development is intended to provide for a vibrant and diverse community, while delivering a connected residential neighbourhood which knits in to both the established and the emerging residential developments in the area. High-quality landscaping and public realm, with a focus on the creation of distinctive character areas is proposed. A new street will run east-west across the north of the site and the creation of a new public space at the heart of the proposed scheme will connect to a publicly accessible linear park along the canal to the south. Permeability is a key feature of the proposed pedestrian realm, including a mix of dedicated and shared surface areas through the site with a continuous amenity strip along the Grand Canal Linear Park. Please refer to the Architectural Design Statement submitted with this application for further detail.

5.1.6 Part V Provision

The proposed development will comply with Part V of the Planning and Development Act 2000 (as amended). It is intended to provide 34 no. apartment units for the purposes of complying with Part V of the Planning and Development Act. The 34 no. units subject to Part V comprise 20 no. 1 bed units and 14 no. 2 bed units within Block No. 1 and No. 5. Please refer to the Part V Report prepared by OMP enclosed with this application, and to Appendix III of this Report which provides further details in relation to compliance with Part V.

5.1.7 Services

OCSC have prepared a detailed Drainage and Watermains Planning Report which provides a detailed description of the proposed Foul Drainage, Surface Water Drainage Management (including SuDS) and Watermains serving for the proposed development.

6. Statement of Consistency

As required by the 2016 Act, this Section of the Report demonstrates the manner in which the proposal is consistent with the relevant policies and objectives of the Development Plan (with the exception of building height, unit mix, private amenity space, car parking standards, studio apartment widths and unit floor areas). In addition, the development is assessed against national planning policy and the relevant section 28 Guidelines. This Section should be read in conjunction with the Material Contravention Statement prepared by Avison Young and submitted under separate cover which outlines why permission for the proposed development should be granted, having regard to the provisions of section 9(6) of the 2016 Act and section 37(2)(b) of the 2000 Act.

6.1 Strategic Planning Context

6.1.1 National Planning Policy

National Planning Framework

The government published the National Planning Framework (hereafter the NPF) in February 2018 which projects a need for a minimum of 550,000 new homes by 2040, at least half of which are targeted for provision within the built-up area of Ireland's five cities. The NPF signals a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located and by prioritising sustainable modes of transport. The objectives in the NPF that are of particular relevance to the proposed development are outlined below:

National Policy Objective 3a: Securing Compact and Sustainable Growth

*"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements."*¹

National Policy Objective 3b: Securing Compact and Sustainable Growth

*"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."*²

¹ Project Ireland 2040, National Planning Framework, page 29.

² Project Ireland 2040, National Planning Framework, page 29.

National Policy Objective 11: Achieving Urban Infill

"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."³

National Policy Objective 27: Healthy Communities

"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."⁴

National Policy Objective 33: Housing

"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."⁵

National Policy Objective 35: Housing

"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."⁶

The subject site is located in Dolphin's Barn, a suburb situated c. 2.5km from the City Centre and within the existing built-up footprint of the City. The delivery of 335 no. residential units at this location is in accordance with National Policy Objectives 3a and 3b which seek to achieve compact and sustainable growth within the built-up footprint of existing settlements and also the delivery of 50% of new homes in the five cities of Dublin, Cork, Waterford, Limerick and Galway.

The proposed scheme will generate economic activity and place people close to existing services and employment within the existing footprint of Dublin City and Dolphin's Barn locality. The proposed scheme is consistent with National Policy Objective 11 which seeks to encourage more people and generate more jobs and activity within existing cities, towns and villages.

³ Project Ireland 2040, National Planning Framework, page 65.

⁴ Project Ireland 2040, National Planning Framework, page 82.

⁵ Project Ireland 2040, National Planning Framework, page 163.

⁶ Project Ireland 2040, National Planning Framework, page 164.

The proposed development will benefit from its location within proximity to the City Centre along with the available modes of sustainable transport which include Dublin Bus stops immediately adjacent to the site on South Circular Road and on Dolphin's Barn Street with the Fatima Luas stop situated approximately 800 metres to the north and Rialto Luas stop located approximately 1km to the north-west. The design of the proposed development, with pedestrian permeability and connections to public transport, will provide safe and convenient alternatives to the car in accordance with National Policy Objective 27, which seeks to promote healthy communities.

The subject proposal is consistent with National Policy Objectives 33 and 35 which seek to provide new homes in appropriate locations and higher densities through increased building height in existing settlements and is in accordance with the requirement *'to build inwards and upwards, rather than outwards'* as highlighted in the NPF.

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

The Action Plan for Housing and Homelessness (APHH) was published under the Government's *Rebuilding Ireland Initiative* and represents a response by the Government to address the current shortfall in housing provision by seeking to accelerate the delivery of housing units. In providing an overview of the Action Plan, the acceleration of the delivery of housing for the private, social and rented sectors is a stated priority for the Government. The APHH sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021.

Furthermore, the APHH notes that:

"Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets people's different needs, and is of lasting quality, is one of the greatest challenges facing the country at present."

The Action Plan seeks to address existing issues of housing supply and homelessness in Ireland through five 'Pillars'. Pillar Two involves accelerating social housing while Pillar Three involves building more homes. Doubling the output of private housing to 25,000 units per annum by 2021 is a 'key action' for Pillar three and delivering 47,000 social housing units by 2021 is a 'key action' under Pillar two.

The proposed development at the White Heather Industrial Estate responds to a recognised need at a national, regional and local level for additional high-quality housing. The proposal will provide a total of 335 no. residential units in proximity to Dublin City Centre, including 34 no. Part V units, in compliance with Pillar Two and Pillar Three of the APHH.

6.1.2 Regional Planning Policy

Eastern and Midland Regional Assembly – Regional Spatial and Economic Strategy

The NPF requires the Regional Assemblies to prepare Regional Spatial and Economic Strategies in accordance with the Framework set by the NPF. The subject site is located in the Eastern and Midland Regional Assembly area for which a Regional Spatial and Economic Strategy (RSES) was published for the period 2019-2031.

The Strategic Vision of the RSES sets out 16 'Regional Strategic Outcomes' (RSOs), which are noted to be:

*"Aligned with international, EU and national policy and which in turn set the framework for City and County Development Plans."*⁷

The following Regional Strategic Outcomes (RSO) are of particular relevance to the proposal:

RSO 1: Sustainable Settlement Patterns

"Better manage the sustainable and compact growth of Dublin as a city of international scale".

RSO 2: Compact Growth and Urban Regeneration

"Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens".

RSO 6: Integrated Transport and Land Use

"Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning".

The Settlement Strategy of the RSES is informed by the NPF which predicts that the population of Dublin will increase from 1,347,500 in 2016, to between 1,489,000-1,517,500 in 2026 and to between 1,549,500-1,590,000 by 2031.⁸ The Settlement Strategy for Dublin City and Suburbs builds on the objectives of the NPF and recognises the need for compact growth with the following summary provided:

⁷ Eastern and Midlands Regional Assembly Regional Spatial & Economic Strategy, pg 25

⁸ Eastern and Midlands Regional Assembly Regional Spatial & Economic Strategy, pg 44

"Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs"⁹

It is noted that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. Consolidation and re-intensification are specific objectives of the Settlement Strategy for Dublin City and Suburbs as outlined in Regional Policy Objective (RPO) 4.3 that seeks to:

"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."¹⁰

In terms of housing, RPO 5.5 is relevant to the proposed development as the Objective is based on the need to provide quality, affordable housing which plays a key role in underpinning economic growth and competitiveness of the Dublin Metropolitan Area. The Objective sets out that:

"Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns."¹¹

The proposed residential scheme of 335 no. units at a density of c. 262 units per hectare, being well served by public transport and being located within the existing built-up footprint of Dublin City, as well as being proximate to extensive local amenities, is consistent with the Regional Strategic Objectives of the RSES which seek compact growth, intensification and consolidation of the City and the integration of transportation and land use planning.

Through the creation of a high-density residential development, the proposed scheme will provide for a more efficient use of serviced zoned lands, achieving a more compact urban form allowing for

⁹ Eastern and Midlands Regional Assembly Regional Spatial & Economic Strategy, pg 48

¹⁰ Eastern and Midlands Regional Assembly Regional Spatial & Economic Strategy, pg 52

¹¹ Eastern and Midlands Regional Assembly Regional Spatial & Economic Strategy, pg 112

continued population and economic growth of Dublin City and Suburbs, consistent with RSO1, RSO2, RPO 4.3 and RPO 5.5 of the RSES.

The proposed development will contribute to the ongoing consolidation of Dublin City and Suburbs by creating a new urban neighbourhood within Dublin City in an area that is well served by public transport, local amenities and community infrastructure and supporting the integration of land use with high quality public transport provision.

Smarter Travel – A Sustainable Transport Future (2009)

This policy document recognises that current transport and travel trends in Ireland are unsustainable and that if we continue with present policies, congestion will get worse, transport emissions will continue to grow, economic competitiveness will suffer, and quality of life will decline. ‘Smarter Travel – A Sustainable Transport Future’ outlines a number of key goals and targets to achieve its vision of a more sustainable transport system including the following:

- Future population and employment growth should predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services;
- Alternatives such as walking, cycling and public transport will be supported, to ensure that a reduction in travel demand and reliance on the car can be achieved; and
- The need to improve the alignment of spatial and transport planning to stop urban sprawl and urban-generated one-off housing in peri-urban areas.

A Transport Impact Assessment has been prepared by Systra and accompanies this request and provides a Framework Mobility Management Plan for the proposed development. The proposed scheme is consistent with the requirement for future population growth to take place in sustainable compact forms, which reduce the need to travel for employment and services.

The location of the proposed development adjacent to Dublin Bus stops and within walking distance of Fatima and Rialto Luas stops ensures that future residents are provided with easily accessible alternatives to the car, notwithstanding the proximity of the proposal to Dublin City Centre.

The provision of 335 no. residential units at White Heather Industrial Estate is therefore consistent with the requirement to provide for population growth in a compact urban form in close proximity to existing services and to align spatial and transport planning to prevent further urban sprawl.

6.2 Section 28 Guidelines

This Section provides a summary of the relevant Ministerial Guidelines issued under section 28 of the 2000 Act that apply to the proposed development and which are relevant to the Board's determination of the planning application.

6.2.1 Urban Development and Building Heights – Guidelines for Planning Authorities (2018)

The Urban Development and Building Heights – Guidelines for Planning Authorities (2018) (hereafter 'Building Height Guidelines'), as issued under Section 28 of the 2000 Act, sets out new and updated national policy on building heights in relation to urban areas, consistent with the strategic policy framework set out in the NPF.

The Building Height Guidelines form part of a suite of integrated measures intended to shift the current patterns and development trends for cities and towns to form more compact and integrated communities and recognise the need to grow existing towns and cities upwards rather than outwards.

It is noted in the Building Height Guidelines that there is a presumption in favour of buildings of increased height in town/city cores and in other urban locations with good transport accessibility. The Building Height Guidelines provide a number of 'Development Management Principles' and 'Development Management Criteria' which the Planning Authority will consider in assessing development proposals for buildings taller than prevailing building height in urban areas. For ease of reference, these are set out in Table 3 below. The proposed development has been assessed in the context of each of the criteria that are applicable to the proposal, please also the Material Contravention Statement submitted with this application in relation to Building Height for further detail.

Development Management Principles	Compliance
Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?	Yes
Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?	N/A

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?	Yes
Development Management Criteria	Compliance
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	Yes
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. ³ Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	Yes
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	Yes
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	Yes
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).	Yes
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.	Yes
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	Yes
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	Yes

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'.	Yes
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	Yes

Table 3: Height Guidelines: Development Management Principles and Criteria.

The Building Height Guidelines state that, where the relevant planning authority or An Bord Pleanála considers that such criteria are appropriately incorporated into development proposals, the relevant authority “shall apply” the following Strategic Planning Policy Requirement under section 28 (1C) of the 2000 Act.

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".¹²

Having regard to the above, it is considered that the proposed development is consistent with the Development Management Principles and Criteria as outlined in the Building Height Guidelines and is in accordance with national strategic policy set out in the NPF requiring increased residential densities and more compact growth and the need to grow existing towns and cities upwards rather than outwards.

6.2.2 Sustainable Residential Development in Urban Areas (2009) - Guidelines for Planning Authorities

The 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (hereafter 'SRDUA') was issued in 2009. General principles of these SRDUA Guidelines relate to prioritising walking, cycling and public transport over the use of cars, and to provide residents with a quality of life in terms of amenity, safety and convenience. For development in cities and larger towns, it is noted that the objective should be *"the achievement of an efficient use of land appropriate to its context."*¹³

Section 5.2 of the SRDUA Guidelines provides a summary of the design criteria to be considered in the assessment of high-density residential development while detailed advice is provided in the accompanying Urban Design Manual. These factors include, *inter alia*, the points as noted below, which have been fully considered and provided for within the proposal:

- Acceptable building heights;
- Avoidance of overlooking and overshadowing;
- Provision of adequate private and public open space, including landscaping where appropriate and safe play spaces;
- Adequate internal space standards in apartments;
- Suitable parking provision close to dwellings; and

¹² Urban Development and Building Heights - Guidelines for Planning Authorities, 2018, pg 15

¹³ Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, 2009, pg 40

- Provision of ancillary facilities, including childcare.

Sustainable neighbourhoods require a range of community facilities, and each neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. The proposed development provides ancillary facilities including a creche and cafes for the development and is proximate and well connected to a wide range of existing retail, commercial and community facilities in the Dolphin's Barn locale.

Particular sensitivity is required where apartment blocks are higher than adjoining residential developments and it is recommended that they should taper down towards the boundaries of a site within an established residential area. The proposed development has been designed in such an instance.

It is important that land use planning underpins the efficiency of public transport services and in this regard, higher densities are required on public transport corridors, i.e. within 500m walking distance of bus routes or within 1km walking distance of a light rail stop or rail station. It is stated that in general, minimum net densities of 50 dwellings per hectare, subject to design and amenity standards, should be applied within public transport corridors. It is noted that the subject site is located on the South Circular Road which is identified as an Orbital Route under the BusConnects Scheme, while the D-Spine is proposed to run through Dolphin's Barn with a peak frequency of 4 mins between buses. The Dolphin's Bard Road is also identified as a Core Bus Corridor under the BusConnects Scheme. The Fatima Luas stop is approx. 800m from the subject site, while the Rialto Luas stop is approx. 1km away. The proposed development is also located c. 2.5km from the City Centre, easily accessible by bike or on foot, as well as by public transport. It is submitted that the subject site, due to its location adjacent to a public transport corridor and its proximity to local services, as well as cycle and pedestrian routes is consistent with the general principles of the SRDUA Guidelines and can cater for higher density development subject to the design criteria mentioned above.

The provision of a high-density residential development at this location will provide for a more efficient use of land on what is currently an underutilised serviced site, within Dublin City. The height of the proposed blocks, ranging from 2 no. to 10 no. storeys and reaching a maximum of c. 33m above ground, is considered to be acceptable having regard to the location of the subject site adjacent to a public transport corridor, the layout and design of the blocks that taper down towards the site boundaries. The Material Contravention on Height as set out in the Material Contravention Statement submitted with this application also has regard to the recent national policy shift away from arbitrary height standards as highlighted in the NPF, the Sustainable Urban Housing: Design Standards for New

Apartments - Guidelines for Planning Authorities and the Urban Development and Building Heights - Guidelines for Planning Authorities.

A daylight analysis has been prepared by Avison Young and accompanies this application which indicates that the levels of overshadowing as a result of the proposed development on the surrounding area is expected to be negligible or be minor and within BRE guidelines.

Adequate public and private open space including play spaces are included in the proposed development. Further details of the open spaces can be found in the Landscape Masterplan submitted with this preapplication consultation request. The private open space and internal layout of each proposed residential unit meets the requirements of the Apartment Guidelines and the Development Plan's Development Management Standards. Please refer to OMP's Schedule of Accommodation and Housing Quality Assessment for exact figures relating to private open space and internal layout dimensions relating to each proposed residential unit.

106 no. car parking spaces are provided in the proposed development, which is considered appropriate based on the site's location, proximity to public transport, local amenities, walking and cycling infrastructure, availability of car clubs and electric car charging points.

It is submitted that the density of the proposed development at c. 262 no. units per hectare is appropriate having regard to the location of the subject site adjacent to a public transport corridor, its proximity to local services, the design and layout of the residential blocks, the national policy shift away from maximum height standards, mitigation of overlooking and overshadowing, the provision of adequate public and private open space and the high quality of residential amenity afforded to the residential units.

It is submitted that the subject site can cater for higher density development subject to the design criteria mentioned above. The provision of a high-density residential development at this location will provide for a more efficient use of this under-utilised site. The height of the proposed development is considered to be acceptable having regard to the location of the subject site, the layout and design of the scheme respects the neighbouring residential properties.

By facilitating a mixed-use development of a brownfield inner-city site and by promoting the efficient use of land and of investment in public transport as required, the site supports increased densities through;

- The provision of a high-quality public realm;
- Pedestrian priority streets and home zones providing permeability and legibility;

- The high-quality urban design, aligned with a considered landscape design provides for a sense of place linking to the existing neighbourhood;
- Strong transport linkages including LUAS, bus, cycling and walking options.

6.2.3 Urban Design Manual - A Best Practice Guide (2009)

The Urban Design Manual is used as a companion reference on best practice for the implementation of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas. The two documents are intended to be read in conjunction with each other. The focus of the Urban Design Manual is on creating well-designed sustainable neighbourhoods that will “*stand the test of time*”.

In responding to the opportunities and constraints of the site and its context, this section sets out the objectives and establishes a suitable approach to the site layout, public routes and connectivity; reviews the overall massing and the distribution of units across the site to respond to its urban location, context, orientation and residential amenity; and provides for an appropriate mix of tenure types. The Urban Design Manual is based on 12 no. design criteria that encapsulate the range of design considerations for residential development. The 12 no. design criteria laid out in the Urban Design Manual are as follows:

- **1. Context:** How does the development respond to its surroundings?
- **2. Connections:** How well connected is the new development / site / neighbourhood?
- **3. Inclusivity:** How easily can people use and access the development?
- **4. Variety:** How does the development promote a good mix of activities?
- **5. Efficiency:** How does the development make appropriate use of resources, including land?
- **6. Distinctiveness:** How do the proposals create a sense of place?
- **7. Layout:** How does the proposal create people-friendly streets and spaces?
- **8. Public Realm:** How safe, secure and enjoyable are the public areas?
- **9. Adaptability:** How will the buildings cope with change?
- **10. Privacy/Amenity:** How do the buildings provide a high-quality amenity?
- **11. Parking:** How will the parking be secure and attractive?

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

The Design Statement prepared by OMP Architects provides an overview of how the design of the proposed development has had regard to the 12 criteria in the Urban Design Manual: A Best Practice Guide. It highlights that *inter alia*:

- The development seeks to integrate and open up a large and significant site located between South Circular Road and the Grand Canal.
- The development will create a new open and permeable edge to the canal to the south, with the addition of significant new amenity spaces and activities facing onto the canal.
- The proposed development is laid out in a way to encourage pedestrian and cycle movement into and through the new public realm toward the canal, while also setting up a series of streetscapes which are reflective of the character and scale of the surrounding areas.
- The proposed boundary and landscape treatments further enhance the quality and character of the new public spaces and street scape, ensuring all areas are accessible, comfortable and inviting to use.
- The proposed development sees the regeneration of this strategic brownfield site, to create a primarily new residential neighbourhood, fully integrated with the surrounding context, while also delivering public access and additional public realm and amenity to an area deficient in such amenities, and also re-connecting and re-opening a significant south facing canal frontage.
- The proposed apartment buildings include a variety of 'open plan' unit types set within a linear terrace form, which accommodate the full range of life needs. Provision of Resident Amenities within the development, to foster community, also consider the inclusion of 'working' spaces to support home working.
- The public realm and proposed outdoor open spaces enjoy a high level of passive surveillance from the proposed blocks and houses through the considered layout of the scheme. The proposed development consists of a series of terrace type buildings arranged and orientated (east west) onto landscaped courtyard gardens between. The privacy and amenity of existing adjoining residential properties (onto St James Terrace, South Circular Road and Priestfield Cottages) have been considered and the design developed and refined to protect these.
- Parking is provided in a secure/controlled under-croft garage located under the footprint of the Blocks 02 and 03, while carports are provided to houses on the western edge, while some

surface parking has been integrated into the landscape layout to minimise its presence and impact on the overall pedestrian priority and quality of the new neighbourhood. A reduced provision of parking is proposed (0.3 spaces/unit) to minimise impact of parking.

- The proposed building design has developed to respond sympathetically and appropriately to its immediate context and setting.

6.2.4 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020)

Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020) (hereafter 'Apartment Guidelines') provide guidance to planning authorities setting out standards for apartment development and contains several specific requirements with which compliance is mandatory.

The key aim of these Guidelines is to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures resulting in greater delivery of apartments in Ireland's cities and towns. It outlines the importance of building inwards and upwards rather than outwards due to on-going population growth, a long-term move towards smaller average household size, an ageing and more diverse population with greater labour mobility and a higher proportion of households in the rented sector.

Importantly, it reaffirms the move away from rigidly applied blanket planning standards signalled by the NPF, including building separation distances and highlights that these blanket restrictions on building separation distance that may be specified in development plans should be replaced by performance criteria, appropriate to location. In relation to this point, is further noted that *"there is a need for greater flexibility in order to achieve significantly increased apartment development in Ireland's cities."*¹⁴

In general, it is set out that apartments are most appropriately suited within urban areas while the scale and extent of apartment development should increase in proximity to 'core urban centres' and 'other relevant factors'. Central urban locations suitable for higher density development include:

- *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;*

¹⁴ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, pg 10

- *Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.*

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.¹⁵

It is set out that central urban locations are suitable for higher density development including those sites within walking distance of principal city centres, or significant employment locations. These may include hospitals and third-level institutions; sites within reasonable walking distance to high-capacity urban public transport stops (such as DART or Luas); and sites within easy walking distance urban bus services. It is noted that the subject site is located within a short walking distance of the Coombe Women's Hospital to the north (less than 5 mins), with Dublin Bus stops situated on the South Circular Road and two Luas stops (Fatima and Rialto) located within 1km of the site. Greater transport capacity in the area will be achieved with the introduction of the BusConnects corridors in the immediate area.

The Guidelines outline that Build-to-Rent (BTR) housing developments have a potential role to play in providing choice and flexibility and can provide a viable long-term housing solution. The Guidelines define Build-to-Rent developments as:

"Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord."¹⁶

BTR has a number of distinct characteristics, summarised as follow:

Ownership: *Ownership and management of BTR developments is usually carried out by a single entity.*

Amenities: *The provision of dedicated amenities and facilities specifically for residents is usually a characteristic element.*

Residential Delivery: *BTR, once constructed, the overall scheme is available to the rental sector over a much shorter timescale on completion and the investment model is therefore capable of delivering a much higher volume of housing than traditional models.*

¹⁵ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, pg 6

¹⁶ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, pg 26.

The proposed development will be owned and managed by the Applicant, U+I (White Heather) Limited; will provide a number of exclusive residential amenities for the residents; and will help deliver much needed residential accommodation onto the rental market. Please refer to the Build to Rent Justification Report submitted with this request for further detail.

There are a number of 'Specific Planning Policy Requirements' (SPPRs) which Planning Authorities must have regard to and for clarity, those SPPRs that are relevant to the proposed development are summarised as follows:

Specific Planning Policy Requirement 7

"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"¹⁷.

Where the requirements of SPPR 7 are fulfilled, the proposed BTR development will qualify for assessment as a specific BTR scheme, where a number of distinct planning criteria may be applied.

¹⁷ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, pg 27-28.

The proposed development is a Build-to-Rent scheme comprising of 335 no. residential units. Additionally, the proposed scheme satisfies the requirements for the provision of supporting communal and recreational amenities within the development.

Specific Planning Policy Requirement 8

"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 regulations¹⁸.*

The proposed development has been designed with regard to the design parameters as set out in the Guidelines in respect of *inter alia* unit mix, size, dual-aspect ratio, amenity space and internal space. The Technical Document prepared by OMP has the comprehensive details of the design parameters for the proposed scheme.

¹⁸ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, pg 28-29

Specific Planning Policy Requirement 1

*"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)."*¹⁹

The proposed scheme includes 335 no. residential units. As part of the proposed scheme, there are 196 no. one bedroom units and 2 no. studio units, which amounts to approx. 59% of the total no. of units. However, as the proposal is a Build to Rent SHD, the restriction on unit mix in the Guidelines, including the 50% cap on one-bedroom and studio type units, is disapplied.

The proposed development has been designed with the needs of the future resident in mind, with accommodation designed for a range of demographics including singles, couples, sharers and families. Expert advice has been provided by LIV Consult to ensure that the design of the development creates a sustainable community which is professionally managed. The level of on-site resident amenity is far superior to that currently available in the local market and each space has been designed to create welcoming and inviting environment where residents can meet and interact.

Although the proposed scheme contravenes the Development Plan in terms of unit mix, it is noted that the proposed scheme is consistent with both SPPR 7 and SPPR 8 of the Apartment Guidelines in relation to the provision of one bedroom and three bedroom units.

Specific Planning Policy Requirement 3

SPPR 3 outlines minimum apartment floor areas for studios, 1-bedroom, 2-bedroom and 3-bedroom apartment units and these are outlined in Table 4 below:

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

¹⁹ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, pg 9

3-bedroom apartment (5 persons)	90 sq.m
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Table 4: SPPR 3 Minimum Apartment Floor Areas

It should be noted that, in respect of Build-to-Rent developments, SPPR 8(iv) provides that *“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”*.

Appendix 1 of the Apartment Guidelines provides required minimum areas and standards in relation to living/dining/kitchen/bedroom areas, storage and private/communal amenity space²⁰. The following tables provide an assessment of the proposed development against the aforementioned areas and standards.

Apartment Type	Min. Overall Apt Floor Area (SPPR 3)	Proposed Development
Studio	37 sqm	37.7 sqm
One Bedroom	45 sqm	45.1 – 57.2 sqm
Two Bedrooms (3 persons)**	63 sqm	65.2 – 77.5 sqm
Two Bedrooms (4 persons)	73 sqm	73.1 – 93.1 sqm
Three Bedrooms	90 sqm	105.4 sqm

Table 5: Overall Apartment Areas

** Permissible in limited circumstances

Apartment Type***	Width of Living / Dining Room	Proposed Development	Aggregate Floor Area of Living / Dining / Kitchen Area*	Proposed Development
Studio	4 sqm	4.8 m	30 sqm**	30.7 sqm
One Bedroom	3.3 sqm	3.3 – 6.1 m	23 sqm	23 – 32.6 sqm
Two Bedrooms (3 persons)	3.6 sqm	4.1 – 5.6 m	28 sqm	28.4 – 30.4 sqm
Two Bedrooms (4 persons)	3.6 sqm	3.8 – 6.0 m	30 sqm	30.0 – 46.3 sqm
Three Bedrooms	3.8 sqm	5.1 m	34 sqm	34.2 sqm

Table 6: Minimum Aggregate Floor Areas for Living/Dining/Kitchen rooms, and Minimum Widths for the main Living/Dining Rooms

* Note: An enclosed (separate) kitchen should have a minimum floor area of 6.5 sq. metres

** Note: Combined living/dining/bedspace, also includes circulation

*** Note: Variation of up to 5% can be applied to room areas and widths subject to overall compliance with required minimum overall apartment floor areas

²⁰ Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, pgs 35-36

Apartment Type	Minimum Width	Proposed Development	Minimum Floor Area	Proposed Development
Studio	4 sqm	4.8 m	30 sqm**	30.7 sqm
Single Bedroom	2.1 sqm	2.1 – 3.1 m	7.1 sqm	7.2 – 10.3 sqm
Double Bedroom	2.8 sqm	2.8 - 3.5 m	11.4 sqm	11.4 – 12.9 sqm
Twin Bedroom	2.8 sqm	2.8 - 3.5 m	13 sqm	13.0-16.2 sqm

Table 7: Minimum Bedroom Floor Areas/Widths***

* Note: Minimum floor areas exclude built-in storage presses that are contributing to storage space requirements

**Note: Combined living/dining/bedspace

Bedroom	Area	Proposed Development
One Bedroom	11.4 sqm	11.4 – 14.8 sqm
Two Bedrooms (3 person)	20.1 sqm (13 sqm + 7.1 sqm)	20.1 – 24.0 sqm
Two Bedrooms (4 person)	24.4 sqm (11.4 sqm + 13 sqm)	24.4 – 29.8 sqm
Three Bedrooms	31.5 sqm (11.4 sqm + 13 + 7.1 sqm)	32.8 sqm

Table 8: Minimum Aggregate Bedroom Floor Areas

Apartment Type	Area	Proposed Development
Studio	3 sqm	3.3sqm
One Bedroom	3 sqm	3.0 – 4.1 sqm
Two Bedrooms (3 person)	5 sqm	5.0 – 6.8 sqm
Two Bedrooms (4 person)	6 sqm	6.0 – 8.1 sqm
Three or more Bedrooms	9 sqm	9.3 sqm

Table 9: Minimum Storage Space Requirements

Apartment Type	Area	Proposed Development
Studio	4 sqm	0.0 sqm
One Bedroom	5 sqm	5.0 – 19.4 sqm
Two Bedrooms (3 person)	6 sqm	7.0 – 38.3 sqm
Two Bedrooms (4 person)	7 sqm	7.0 – 101.0 sqm
Three Bedrooms	9 sqm	11.3 sqm

Table 10: Minimum Floor Areas for Private Amenity Space

Apartment Type	Area	Proposed Development
Studio	4 sqm	4.0 sqm
One Bedroom	5 sqm	5.0 sqm
Two Bedrooms (3 person)	6 sqm	6.0 sqm
Two Bedrooms (4 person)	7 sqm	7.0 sqm
Three Bedrooms	9 sqm	9.0 sqm

Table 11: Minimum Floor Areas for Communal Amenity SpaceSpecific Planning Policy Requirement 4

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

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate 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.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."*²¹

The proposed development includes 53% dual aspect apartment units. Please refer to the architectural report for further detail.

Specific Planning Policy Requirement 5

*"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality."*²²

²¹ Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020, pg 15

²² Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020, pg 16

Ground floor ceiling heights in all apartment units are proposed as 2.7m. Please refer to architectural report for further detail.

Specific Planning Policy Requirement 6

“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.”²³

As mentioned above, the requirement under SPPR 6 is disapplied by SPPR 8 (v) due to the proposal being a Build-to-Rent scheme. The number of apartments per floor per core range from 3 no. to 8 no.as follows:

Block No.	Units Per Core Per Floor
1	5 no. (1 core)
2	7-8 no. (2 cores)
3	6-7 no. (2 cores)
4	6-7 no. (2 cores)
5	3 no. (1 core)
6	5 no. (1 core)
7	8 no. (1 core)

Table 12: Proposed Block Configuration

While SPPR 8(v) states that 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, the proposed development does not exceed 12 no. units per core.

Having regard to the central accessible urban location of the subject site, it is submitted that the scale and extent of the proposed development, as well as the mix of units, is appropriate and is consistent with the Specific Planning Policy Requirements of the Apartment Guidelines. The subject proposal presents an attractive and desirable housing option across a range of unit types, responding to the need to cater for smaller average household sizes. The proposed scheme is in accordance with the current national policy shift away from current patterns of development towards more compact urban growth.

The proposed development, as a Build-to-Rent scheme, intends to deliver a well-managed and serviced residential development with high-quality community focussed on-site amenities. The intention is that the exemplar quality of the apartments and townhouses will be supported by the resident support

²³ Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020, pg 17

facilities and shared social and recreational facilities, including a gym/yoga studio, café's, residents lounge, media room, meeting rooms, workspace and resident's terrace. The proposed residential neighbourhood scheme and mix of unit types is intended to be as attractive to the widest range of residents, while facilitating flexibility to accommodate bigger or smaller unit sizes as resident's requirements change over time.

6.2.5 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Department of Housing, Planning and Local Government (formerly Department of Environment, Heritage and Local Government) Guidelines for Planning Authorities on Childcare Facilities (2001) (hereafter 'Childcare Guidelines') provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and to guide developers and childcare providers in formulating development proposals.

The Childcare Guidelines are based on the need to ensure a *"suitably high quality"* of childcare facilities are provided while recognising that *"quality childcare can benefit children, their parents, employers and communities in general."*²⁴ It is also noted that access to quality childcare services contributes to the social, emotional and educational development of children and that there are *"clear economic benefits from the provision of childcare"* including the potential for employment in its own right.

In terms of determining appropriate locations for childcare facilities, the Childcare Guidelines outline that:

*"For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate" and that "authorities could consider requiring the provision of larger units catering for up to 30/40 children in areas of major residential development on the basis that such a large facility might be able to offer a variety of services – sessional/drop in/after-school, etc."*²⁵

It is noted in the Childcare Guidelines that any modification to the indicative standard of one childcare facility per 75 dwellings should have regard to:

"1. The make-up of the proposed residential area, i.e. an estimate of the mix of community the housing area seeks to accommodate. (If an assumption is made that 50% approximately of the housing area will require childcare then in a new housing area of 75 dwellings, approximately 35 will need childcare. One facility providing a minimum of 20 childcare places is therefore considered to be

²⁴ Guidelines for Planning Authorities on Childcare Facilities, 2001, pg 3

²⁵ Guidelines for Planning Authorities on Childcare Facilities, 2001, pg 5

a reasonable starting point on this assumption. Other assumptions may lead to an increase or decrease in this requirement.)

*2. The results of any childcare needs analysis carried out as part of a county childcare strategy or carried out as part of a local or action area plan or as part of the development plan in consultation with county 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."*²⁶

As set out within the associated Social Infrastructure Audit, the site's locality is well served by childcare facilities (c. 17 no.), however there is still a demand for childcare services in the area. Dublin City Childcare Committee (DCCC) have advised that many of the existing childcare facilities in the locality have limited capacity or are at full capacity.

In determining childcare provision, analysis of the accommodation being proposed within the development has taken cognisance of the guidance within the Apartment Guidelines which states that:

*"the threshold for provision of any such facilities in apartment schemes should be established having regard to 21 the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms."*²⁷

In order to meet the standard rate of 20 childcare places per 75 units as set out within the Childcare Guidelines, the proposed development would be required to provide a childcare facility catering for c. 37 children. As referred to within the commentary regarding the Dublin City Development Plan, the proposed scheme includes the provision of a c. 260 sqm childcare facility providing for c. 74 childcare spaces. Childcare provision has been determined by demographic profile of the proposed development, the surrounding area and the geographical distribution of existing childcare facilities in the area.

A total of c. 67 sqm of amenity space is provided adjacent to the proposed childcare facility. It is submitted that the provision of 1 no. childcare facility with catering for c. 74 childcare spaces is sufficient

²⁶ Guidelines for Planning Authorities on Childcare Facilities, 2001, Appendix 2, pg 14

²⁷ Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020, pgs 20-21

to cater for the expected demand for childcare generated by the proposed development and is consistent with the requirements of the Development Plan and the Childcare Guidelines.

6.2.6 Design Manual for Urban Roads and Streets (2013)

The Design Manual for Urban Roads and Streets (DMURS) was issued in 2013 under section 28 of the 2000 Act and sets out design guidance and principles for the construction of new and retrofitting existing roads and streets in Ireland with a speed limit of 60km/h or less. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. DMURS seeks to compliment the policies on sustainable transportation proposed in Smarter Travel (2009) and the policies on sustainable living contained in SRDUA.

Section 1.2 of DMURS sets out a policy that street layouts should be interconnected to encourage walking and cycling and offer easy access to public transport. It is also noted in Section 1.2 that compact, denser, more interconnected layouts, particularly where served by good quality bus or rail services, will help to consolidate cities, towns and villages making them viable for reliable public transport.

Section 3.2 outlines the hierarchy of streets with 'Local Streets' described as streets that provide access within communities and to Arterial and Link streets.²⁸ Section 4.4.1 of DMURS states that the standard carriageway width on local streets should be 5-5.5 metres, or 4.8 metres where a shared surface is proposed. Further guidance is provided in relation to carriageway surfaces, junction design, forward visibility, visibility splays, on-street parking and loading.

The Transport Assessment prepared by Systra outlines in detail how the proposed development is consistent with the policies and recommendations of DMURS. The Assessment describes the existing environment, presents the accessibility of the site for pedestrians, cyclists, public transport users and private vehicles, estimates the future traffic generated by the proposed development and assesses the impact of the traffic on the transport networks in accordance with DMURS.

6.2.7 Architectural Heritage Protection - Guidelines for Planning Authorities (2011)

The Architectural Heritage Protection Guidelines were first issued in 2005, by the then Department of the Environment, Heritage and Local Government, under sections 28 and 52 of the 2000 Act. The Guidelines were amended by the Department of Arts, Heritage and Gaeltacht, in 2011 following the transfer of functions and change of titles.

²⁸ Design Manual for Urban Roads and Streets, 2013, pg 36

Section 13.5 of the Heritage Protection Guidelines deals with development within the curtilage of a Protected Structure, while Section 13.8 deals with development affecting the setting of a Protected Structure.

There is 1 no. protected structure (Our Lady of Dolour's Church) located adjacent to the subject site to the north-west. The Architectural Heritage Assessment prepared by ARC contained in the EIAR, provides a detailed assessment of the architectural and historical significance of the Church and its relationship to the proposed development.

6.2.8 The Planning System and Flood Risk Management - Guidelines for Planning Authorities (2009)

The Minister issued 'The Planning System and Flood Risk Management: Guidelines for Planning Authorities' (hereinafter the 'Flooding Guidelines') in November 2009 which provide comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process. The associated Technical Appendices of the Guidelines for Planning Authorities on Flood Risk Management provide guidance on the identification and assessment of flood risk and addressing flood risk management in design of development.

A Site-Specific Flood Risk Assessment [SSFRA] has been carried out by OCSC In accordance with the Flooding Guidelines which identifies that the proposed site is not at risk of fluvial or tidal flooding and that groundwater flood risk to the site is low.

6.3 Local Planning Policy

6.3.1 Dublin City Development Plan 2016-2022

The relevant Development Plan for the subject site is the Dublin City Development Plan 2016-2022 (the 'Development Plan'). It sets out the policy framework against which all applications for permission at the subject site will be assessed. There are a number of Development Plan policies, objectives and development management standards that apply to the proposed development, and these are outlined below.

Core Strategy

The Core Strategy of the Development Plan was varied (Variation No.7) in March 2020 in order to incorporate the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES). The Development Plan sets out to achieve NPF targets of compact growth and urban consolidation, the NPF identifies as key, the reusing of large and small brownfield land/infill sites, and underutilised lands at locations that are well served by existing and planned public transport for housing and people intensive employment purposes. The NPF particularly highlights the need to focus on underutilised lands within the canals and the M50 ring and the relocating of less intensive uses outside the M50 ring and the existing built-up area generally. The benefits of this approach for the City include achieving more homes and jobs through high quality and high-density mixed-use development.

The updated population and housing figures based on Census data 2016, estimate for 2019 and NPF and RSES allocations set out a population increase of 43,878 (low) and 52, 878 (high) for the period 2016-2022 and a housing requirement for the same period as 21,939 (low) and 26,439 (high) which assumes 2 occupants/unit. The proposed development, comprising 335 no. residential units will contribute towards meeting the new dwellings requirement during the Development Plan period.

Zoning Objective

The land use zoning objectives of the application site were subject to a variation (No. 23) to the Development Plan in March 2020 that amended the zoning from Z6 (Employment/Enterprise) to Z1 (Sustainable Residential Neighbourhoods) and Z9 (Amenity/Open Space Lands/Green Network). The purpose of the variation was to enable the more efficient use of these urban lands to reflect the wider residential nature of the area (see Variation Zoning Map at Figure 7).

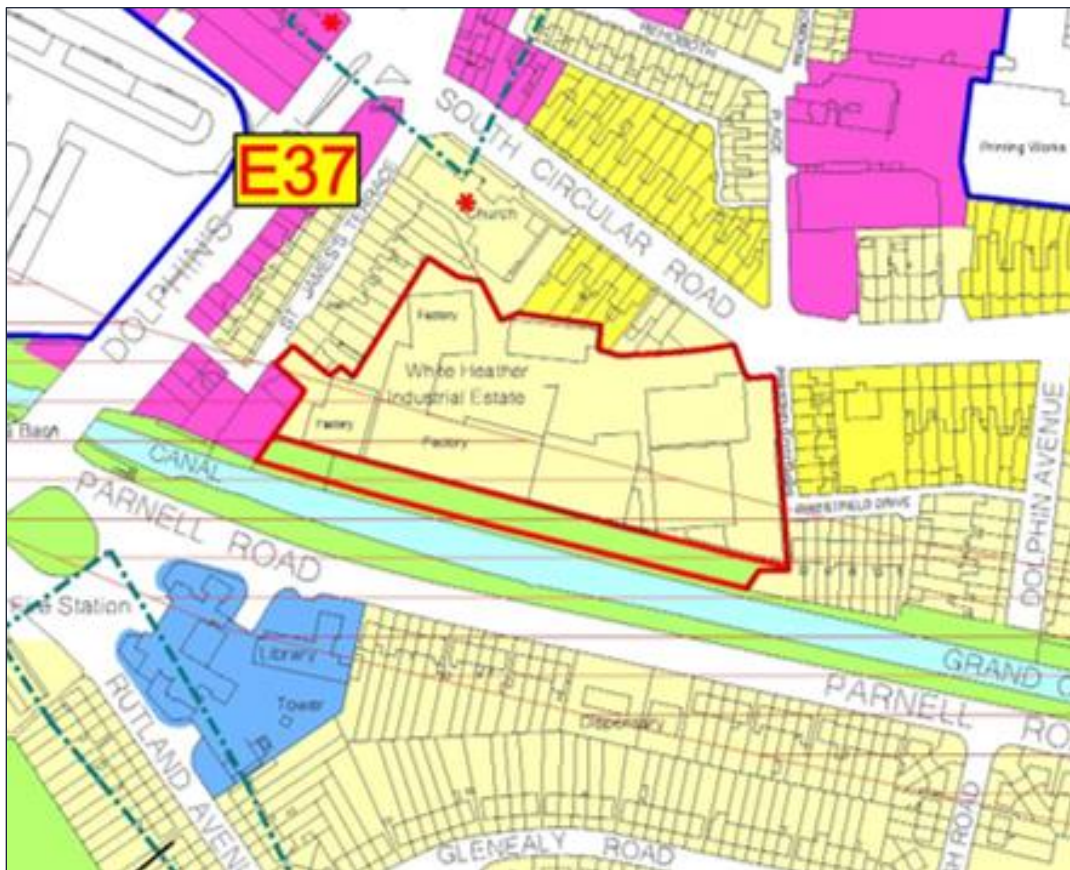


Figure 7 – Variation No.23 of the Dublin City Development Plan (White Heather Industrial Estate)

It should be highlighted that the zoning objective as referenced above (i.e. the red line boundary of the lands subject to Variation No. 23) should not be read as the complete application site boundary and Figure 6 is provided for information purposes only.

Z1 zoned lands have the following land use objective: *“To protect, provide and improve residential amenities”*.²⁹ While the vision for Z1 zoned land is as follows:

“The vision for residential development in the city is one where a wide range of accommodation is available within sustainable communities where residents are within easy reach of services, open space and facilities such as shops, education, leisure, community facilities and amenities, on foot and by public transport and where adequate public transport provides good access to employment, the city centre and the key district centres”.³⁰

Permissible Uses within the Z1 Zoning Objective include residential, childcare facility and shop (local) and as such, the proposed development accords within the Z1 zoning as contained within the Development Plan.

²⁹ Dublin City Development Plan, 2016-2022, pg 238

³⁰ Dublin City Development Plan, 2016-2022, pg 238

Z9 zoned lands have the following land use objective: *"To preserve, provide and improve recreational amenity and open space and green networks".*³¹ The Development Plan states that *"generally, the only new development allowed in these areas, other than the amenity/recreational uses, are those associated with the open space use".*³²

Permissible Uses within the Z9 Zoning Objective include open space and public service installation which would not be detrimental to the amenity of Z9 zoned lands. The proposed development accords within the Z9 zoning as contained within the Development Plan.

Residential Use

Section 5.5.6 of the Development Plan sets out that *"successful apartment living requires that the scheme must be designed as an integral part of the neighbourhood"*³³, and further that:

*"Apartment standards aim to ensure that new apartment developments provide housing with high levels of amenity: within individual apartments, within the overall development including all communal facilities, and by ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood."*³⁴

In respect of apartments, Policy QH18 of the Development Plan seeks:

*"To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation."*³⁵

In relation to housing, Section 5.5.7 of the Development Plan comments that it is important to provide a good mix of house types and sizes that are provided in tandem with suitable physical, social and community infrastructure. In respect of housing, Policy QH21 of the Development Plan seeks:

*"To ensure that new houses provide for the needs of family accommodation with a satisfactory level of residential amenity, in accordance with the standards for residential accommodation."*³⁶

³¹ Dublin City Development Plan, 2016-2022, pg 246

³² Dublin City Development Plan, 2016-2022, pg 46

³³ Dublin City Development Plan, 2016-2022, pg 81

³⁴ Dublin City Development Plan, 2016-2022, pg 81

³⁵ Dublin City Development Plan, 2016-2022, pg 81

³⁶ Dublin City Development Plan, 2016-2022, pg 82

The proposed development includes a mix of studio units, 1-bedroom, 2-bedroom and 3-bedroom residential units across apartment, duplex and townhouse dwelling types. Residential amenities are provided within the scheme including childcare, café, gym, communal dining/kitchen area, workspace, library and public and private amenity space with access to the canal side.

The proposed SHD is consistent with the relevant policies of the Development Plan in relation to the residential use of the lands.

Residential Density

Section 16.4 of the Development Plan states that the planning authority will promote residential densities in accordance with SRDUA guidelines and will have regard to the RSES. The guidelines for SRDUA require minimum net densities of 50 dwellings per hectare on public transport corridors while the RSES indicates supports *"a sequential approach to development with a primary focus on consolidation of sites within or contiguous to the existing built up and zoned area of Dublin City and suburbs."*³⁷

Sustainable densities promoting the highest quality of urban design and open space will be sought by the planning authority in all new developments while public transport capacity will be used to determine the appropriate density allowed. It is noted that all proposals for higher densities must demonstrate how the proposal contribute to place-making and the identity of an area, as well as the provision of community facilities to facilitate the creation of sustainable neighbourhoods.

In relation to the requirement for higher densities, Policies QH7, QH8 and SC13 of the Development Plan outline the Planning Authority's commitment to achieving a more compact, sustainable urban form through increased densities:

QH7: *"To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area."*³⁸

QH8: *"To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area."*³⁹

SC13: *"To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and*

³⁷ Regional Spatial and Economic Strategy for the Eastern and Midlands Region, 2019-2031, pg 112

³⁸ Dublin City Development Plan, 2016-2022, pg 78

³⁹ Dublin City Development Plan, 2016-2022, pg 78

which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.”⁴⁰

Having regard to the above, it is submitted that the proposed development comprises suitably high-density residential development.

Building Height

Section 4.5.4.1 of the Development Plan sets out the planning authority’s policy in relation to Taller Buildings and it is noted that the majority of the Dublin City area is identified in the Development Plan as not being suitable for midrise or taller buildings and accordingly, the spatial approach to taller buildings is *“to protect the vast majority of the city as a low-rise city”⁴¹*.

However, the potential and need for taller buildings to deliver the core strategy is also recognised in the Development Plan. It is noted that in all cases, proposals for taller buildings:

“must respect their context and address the assessment criteria set out in the development standards section to ensure that taller buildings achieve high standards in relation to design, sustainability, amenity, impacts on the receiving environment, and the protection or framing of important views.”⁴²

Section 16.7 of the Development Plan outlines the development standards in relation to building height in a sustainable city. The subject site is not located in an area designated for high rise or medium rise as per Figure No. 39 of the Development Plan and, therefore, the maximum permissible height of up to 24 metres for the ‘low rise inner city’ area for residential development applies to the proposed scheme.

Notwithstanding the above, all proposals for mid-rise and taller buildings must have regard to the following assessment criteria for high buildings:

- Relationship to context, including topography, built form, and skyline having regard to the need to protect important views, landmarks, prospects and vistas;
- Effect on the historic environment at a city-wide and local level;

⁴⁰ Dublin City Development Plan, 2016-2022, pg 62

⁴¹ Dublin City Development Plan, 2016-2022, pg 64

⁴² Dublin City Development Plan, 2016-2022, pg 65

- Relationship to transport infrastructure, particularly public transport provision;
- Architectural excellence of a building which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for;
- Contribution to public spaces and facilities, including the mix of uses;
- Effect on the local environment, including micro-climate and general amenity considerations;
- Contribution to permeability and legibility of the site and wider area;
- Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, a 360-degree view analysis, shadow impact assessment, wind impact analysis, details of signage, branding and lighting, and relative height studies;
- Adoption of best practice guidance related to the sustainable design and construction of tall buildings;
- Evaluation of providing a similar level of density in an alternative urban form.⁴³

The proposed development includes 2 no. blocks (Block 03 and Block 04) which range in height from 8-storey to a maximum of 10 storeys (c. 33.025m). These proposed blocks thereby exceed the Development Plan's maximum permissible height of 24m for inner city residential development, and therefore materially contravene the Development Plan in relation to Building Height. Please see the accompanying Material Contravention Statement submitted with this application for further detail in this regard.

Public Open Space

Section 16.10.3 of the Development Plan outlines policies in respect of public open space for new residential developments and advises that 10% of the site area shall be reserved for public open space.⁴⁴ Further, the Development Plan states that:

*"public open space is genuinely accessible to the general public. Public open space is open space which makes a contribution to the public domain and is accessible to the public for the purposes of active and passive recreation, including relaxation and children's play."*⁴⁵

⁴³ Dublin City Development Plan, 2016-2022, pgs 320-321

⁴⁴ Dublin City Development Plan, 2016-2022, pg 330

⁴⁵ Dublin City Development Plan, 2016-2022, pg 330

Policies relating to public open space within the Development Plan include, *inter alia*:

GI13: "To ensure that in new residential developments, public open space is provided which is sufficient in quantity and distribution to meet the requirements of the projected population, including play facilities for children".⁴⁶

GI33: "To seek the provision of children's play facilities in new residential developments. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play".⁴⁷

The proposed residential scheme has incorporated areas of public open space within its overall design and layout and provides a total of c. 1,300 sqm of open space (c. 10% of the Z1 lands) and a total of c. 2,960 sqm (20% of combined Z1 and Z9 overall site area). Children's play areas are also accommodated within the proposal.

The Development Plan makes reference to proposals which are located adjoining a river or canal bank which is relevant to the proposed scheme as the Grand Canal runs in close proximity to the south of the site. The Development Plan sets out that such proposals should provide a linear walkway along the bank which is accessible to the general public and connects to any existing contiguous walkway along the bank.⁴⁸ The design of the proposed scheme has incorporated a link to the canal bank in this regard. Please refer to the Landscape/Open Space Report prepared by BSLA and submitted with this Request.

Private Open Space

As set out within the Development Plan, private open space shall be provided at the minimum sizes outlined below, with a minimum depth of 1.5m subject to quality standards relating to boundary treatments, privacy, security, aspect, overshadowing.

- Studio unit: 4 sqm
- 1-bedroom unit: 5 sqm
- 2-bedroom unit: 7 sqm
- 3-bedroom unit: 9 sqm

⁴⁶ Dublin City Development Plan, 2016-2022, pg 170

⁴⁷ Dublin City Development Plan, 2016-2022, pg 175

⁴⁸ Dublin City Development Plan, 2016-2022, pg 330

Please refer to the architectural suite of drawings prepared by OMP for a detailed layout of each unit. A Housing Quality Assessment Schedule has also prepared by OMP and is included in the application. A total of 28 no. (c. 8.4%) apartment units are not provided with balconies as private amenity space. However, the majority (c. 91.6%) of the units are provided with the required levels of private amenity space as shown in the detailed Housing Quality Assessment within the submitted Technical Document, which sets out that the minimum standards are met and exceeded in many cases.

The level of public open space and communal open space provided for within the proposed scheme, as well as the provision of high-quality residential amenity spaces throughout the scheme, provides for compensatory amenity as mitigation for the apartments which are not provided with balconies within the scheme. In this regard, while the proposed scheme contravenes the Development Plan in terms of residential private amenity space, it is noted that the proposed scheme is consistent with the 2020 Apartment Guidelines under SPPR 8(ii) in relation to private residential amenity space provision considering the alternative, compensatory communal support facilities and amenities within the development. Please refer to the Material Contravention Statement submitted with this application.

Communal Open Space

The Development Plan outlines that in addition to providing private open space, apartment schemes must also provide for communal open space.⁴⁹ Such space may be in the form of accessible sheltered roof gardens, communal landscaped areas at ground level or at podium level where commercial or retail uses occupy the ground floor. Whilst private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and/or 'privacy strip' between the two. Where appropriate, communal open space should include green spaces that support communal free play, sports and biodiversity.

There are a number of requirements that apply to communal open space development proposals for apartment schemes and it must be demonstrated that the communal open space complies with the minimum standards set out as follows:

- *will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics;*
- *is secure for residents and benefits from passive surveillance;*
- *considers the needs of children in particular in terms of safety and supervision. In schemes of 25 or more units small play spaces of 85-100 sqm are considered suitable for toddlers and children up to*

⁴⁹ Dublin City Development Plan, 2016-2022, pg 327

the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sqm for older children and young teenagers should be provided;

- *is wheelchair accessible;*
- *achieves good sunlight penetration;*
- *has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections.⁵⁰*

The minimum areas for communal amenity space are as follows:

- Studio: 4 sqm
- 1-bedroom unit: 5 sqm
- 2-bedroom unit: 7 sqm
- 3-bedroom: 9 sqm

A summary of the communal open space requirements for the proposed SHD, when the minimum areas for communal open space are applied, is set out in Table 13.

Unit Size	Number	Communal Space Standard	Total Area Required
Studio	2	4 sqm	8 sqm
1-bed	196	5 sqm	980 sqm
2-bed	128	7 sqm	891 sqm
3-bed	2	9 sqm	18 sqm
Total	328	-	1897 sqm

Table 13: Communal Open Space Requirements – Apartments.

In total, c. 2,160 sqm of communal open space is provided throughout the scheme. The proposed communal open space areas in the scheme includes semi-private courtyards and roof terraces. Please refer to the Landscape Report as prepared by BSLA which accompanies this application for further information.

⁵⁰ Dublin City Development Plan, 2016-2022, pg 327

Communal Facilities

The Development Plan notes (Section 16.10.1 Residential Quality Standards – Apartments) that communal facilities may be provided in apartment schemes, particularly in larger developments such as community or meeting rooms, laundry rooms etc. which are accessible to residents only. The proposed scheme includes the following communal facilities:

- Block B03 includes: Concierge/Management Office (65 sq. m), Gym/Yoga studio (105 sq.m), Business Meeting/Hub (130 sq.m), Events Suite (130 sq.m) and Canal Café (175 sq.m) at ground floor (Level 00), Residents Lounge/Library (130 sq.m), Coffee Dock/Bar (25 sq. m), Cinema/Media Room (40 sq. m), Dining/Kitchen area (75 sq. m) and access to an external roof terrace (145 sq. m) at fifth floor level (Level 05).
- Block B05 includes: a café unit (49.3 sq. m) at ground floor level.

Cycle Parking

The Development Plan states that quality and quantity of cycle parking provision in apartment developments should encourage residents to adopt cycling as a sustainable mode of transport.⁵¹ Cycle parking for residential apartment developments shall be provided at a minimum of 1 cycle space per unit (Table 16.2 of the Development Plan) and it is noted that cyclists should be able to secure both frame and wheels to the cycle parking stand. Additional requirements for larger units and visitor parking will be decided on a case-by-case basis.

In total, the scheme will provide 558 no. cycle parking spaces which equates to c. 1.6 cycle parking spaces per apartment unit. This exceeds the required standard as set out in the Development Plan. Please refer to the Transport Report prepared by Systra and submitted with this application for further information.

Car Parking

In relation to car parking standards for apartment developments, the Development Plan sets out that car parking standards are maximum in nature and may be reduced in specific, mainly inner-city locations where it is demonstrated that other modes of transport are sufficient for the needs of residents.⁵² The maximum standards applicable to the development site, as set out in the Development Plan, are a maximum of one space per unit.

⁵¹ Dublin City Development Plan, 2016-2022, pg 328

⁵² Dublin City Development Plan, 2016-2022, pg 361

The subject site is located within Parking Zone 2 as per Map J of the Development Plan. Car parking provision in Zones 1 and 2 is restricted on account of the proximity of these locations to public transport. An increased density of development will be promoted in Zone 1 and those parts of Zone 2 where the development is in close proximity to good public transport links.⁵³ The Development Plan does emphasise that the standards are maximum in nature and may be reduced based on the site's location, proximity to public transport, local amenities, walking and cycling infrastructure, availability of car clubs and electric car charging points.

The proposed development provides a total of 106 no. car parking spaces. The 106 no. car parking spaces will be provided at surface level and within a secure undercroft car park. A total of 5 no. spaces are provided as carports within the townhouses in Block T09. 20% of all car parking spaces will be fitted with electric charging points with the remainder future proofed for the provision of 100%. Additionally, there is 5% provision of disabled parking spaces, 7 no. spaces will be reserved for car sharing and a set-down area (3 no. spaces) for creche drop-offs. Please refer to the Transport Report prepared by Systra and submitted with this application for further information.

The reduced car parking level provided as part of the proposed development is considered appropriate for a Build to Rent residential development with high quality public transport choices. It is submitted that it is consistent with the provisions of SPPR 8(iii) of the 2020 Apartment Guidelines. Please refer to the Material Contravention Statement submitted with this application.

Plot Ratio

The Development Plan sets out indicative plot ratios and for Z1 lands, the ratio is 0.5 – 2.0.⁵⁴ It is noted that higher plot ratios may be permitted in certain circumstances such as:

“Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed.

To facilitate comprehensive redevelopment in areas in need of urban renewal”⁵⁵.

There are no buildings proposed on the Z9 lands. The gross floor area of the proposed development is c. 30,242 sqm. This amounts to a plot ratio of c. 2.1 for the development site which is slightly above the indicative plot ratio standard of 2.0 for Z1 zoned lands as per the Development Plan.

⁵³ Dublin City Development Plan, 2016-2022, pg 358

⁵⁴ Dublin City Development Plan, 2016-2022, pg 316

⁵⁵ Dublin City Development Plan, 2016-2022, pg 316

However, due to the development site being well serviced by public transport, including a QBC and Luas, as well as being within easy walking and cycling distance to the City Centre, it is considered that a plot ratio at 2.1 would be appropriate at this location. Furthermore, the proposed development will result in the redevelopment of an underutilised brownfield site, providing much needed residential accommodation in the city. In this regard, as the Development Plan outlines that a higher plot ratio may be permitted in such circumstances as the proposed SHD's strategic location and proximity to public transport, it is accordingly contended that there is no material contravention of the plot ratio as indicatively outlined in the Development Plan.

Site Coverage

The Development Plan sets out indicative site coverage percentage figures and, for Z1 zoned lands, the figure is 45%-60%.⁵⁶ As with plot ratio, higher site coverage may be permitted in certain circumstances such as:

"Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed.

*To facilitate comprehensive redevelopment in areas in need of urban renewal."*⁵⁷

The building coverage has been calculated by adding the gross floorspace at ground floor of each building, as per the Schedule of Accommodation prepared by OMP Architects. The total site coverage for the proposed development equates to c. 42% of the Z1 lands (c. 1.28 ha) which falls below the indicative site coverage parameters of 45%-60% for Z1 zoned lands as per the Development Plan.

In this regard, it is considered that, as a result of the proposed development being designed with large open space networks that connect the community with the canal frontage, as well as no buildings being located on the Z9 lands, this has resulted in the slight shortfall in meeting the indicative site coverage figure for Z1 lands. The creation of a new publicly accessible space along the Grand Canal provides mitigation against the shortfall.

Roads and Services

It is noted that the design standards for carriageways, gradients, footpaths, cycle lanes, junctions, road drainage, cul-de-sacs, sight lines, boundary walls, vehicle access, service roads, drainage and other underground services adhere to the Design Manual for Urban Roads and Streets (DMURS). An

⁵⁶ Dublin City Development Plan, 2016-2022, pg 317

⁵⁷ Dublin City Development Plan, 2016-2022, pg 316

assessment of the proposed development and its compliance with DMURS is provided in the Transport Impact Assessment prepared by Systra.

Built Heritage

Policy CHC 2 of the Development Plan seeks to ensure that the special interest of protected structures is protected. A protected structure, Our Lady of Dolour's Church, is situated adjacent to the north-west of the site. The Architectural Heritage Assessment contained in the EIAR provides a detailed assessment of the architectural and historical significance of the Church and its relationship to the proposed development and subject site. The proposed development was informed by the Architectural Heritage Assessment and is in accordance with Policy CHC2.

Green Infrastructure

Chapter 10 of the Development Plan outlines specific policies regarding green infrastructure, open space and recreation. The Development Plan states that the enhancement of open spaces for both biodiversity and recreational use has benefits for the city's sustainability and attractiveness as a place to live, work and visit. The following objectives are considered relevant:

"GI3: To develop linear parks, particularly along waterways, and to link existing parks and open spaces in order to provide green chains throughout the city. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.

GI5: To promote permeability through our green infrastructure for pedestrians and cyclists"⁵⁸.

The proposed development seeks to open up the development site to the canal, creating a new canal-side public amenity area running linear along the canal to the south. Permeability is a key feature of the proposed pedestrian realm, linking a mix of dedicated and shared surface areas through the site with an amenity strip along the Grand Canal Linear Park.

Childcare Facilities

Chapter 12 of the Development Plan outlines specific policies regarding the provision of sustainable communities and neighbourhoods and in this instance, Policy SN17 is relevant as it relates to the provision of childcare facilities, and which states:

⁵⁸ Dublin City Development Plan, 2016-2022, pg 167

*"To facilitate the provision in suitable locations of sustainable, fit-for-purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area."*⁵⁹

Furthermore, it is noted that,

*"Other communal facilities such as childcare or gym use could be open to non-residents (see Appendix 13 regarding childcare facility requirements). The provision of such facilities may be influenced by the nature of the proposed apartment development, the size of the individual units and access to facilities off-site."*⁶⁰

Appendix 13 of the Development Plan provides guidance for the provision of childcare facilities in Dublin City and is consistent with the Childcare Guidelines. A benchmark provision of one childcare facility with a minimum of 20 childcare places per seventy-five dwellings is recommended with a pro-rata increase for developments in excess of seventy-five houses. It is noted that *"regard shall be given to the existing geographical distribution of childcare facilities and the emerging demographic profile of the area."*⁶¹

A minimum of 2.3 sqm of internal clear floorspace should be provided per child (3.5 sqm for 0-1-year olds; 2.8 sqm for 1-2 year olds; 2.35 sqm for 2-3 year olds; and 2.3 sqm for 3-6 year olds).⁶²

The information which should be included in any planning application for a childcare facility (as a minimum) is as follows:

- Nature of the facility (i.e. full day care, sessional, drop in, after school care);
- Numbers of children being catered for;
- Parking provision for both customers and staff;
- Proposed hours of operation; and
- Open space provision and measures for management of same.

Section 6 of this Report provides an assessment of the manner in which the proposed development is consistent with Childcare Guidelines, having regard to the existing distribution of childcare facilities and

⁵⁹ Dublin City Development Plan, 2016-2022, pg 221

⁶⁰ Dublin City Development Plan, 2016-2022, pg 328

⁶¹ Dublin City Development Plan, 2016-2022, Appendices, pg 190

⁶² Childcare (Pre-School Services) (No.2) Regulations, 2006, pg 52

the demographic profile of the area. The associated Social Infrastructure Audit, prepared by Avison Young, outlines the childcare facilities in the catchment area of the site.

The proposed development provides 335 no. residential units (2 no. studio units; 196 no. 1-bed units, 128 no. 2-bed units and 9 no. 3-bed units). The proposed scheme includes the provision of a c. 260 sqm childcare facility providing for c. 74 childcare spaces. A total of c. 67 sqm of amenity space is provided adjacent to the proposed childcare facility. A drop-off area and visitor parking are also provided for in the proposed scheme. It is submitted that the provision of 1 no. childcare facility with catering for c. 74 childcare spaces is sufficient to cater for the expected demand for childcare generated by the proposed development and is consistent with the requirements of the Development Plan.

Development Standards for Residential Accommodation

The provision and protection of residential amenity is a primary consideration for the planning authority, and it is an aim of Dublin City Council to encourage living at sustainable urban densities through the creation of attractive mixed-use sustainable neighbourhoods.

Section 16.10 of the Development Plan outlines the required standards for residential accommodation with specific standards for new apartments set out in Section 16.10.1 and residential quality standards for apartments and houses set out in Section 16.10.3. These residential development standards relate to floor areas, mix of units, aspect, block configuration, internal space and layout, storage, private open space, communal open space, communal facilities, cycle parking and design. These development standards as they apply to the proposed apartment development are outlined as follows.

Floor Areas

The minimum floor areas for apartment units within the Development Plan are set out as follows:

- Studio-type 40 sqm;
- 1-bed 45 sqm;
- 2-bed (3P) 63 sqm;
- 2-bed (4P) 73 sqm; and
- 3-bed 90 sqm.⁶³

⁶³ Dublin City Development Plan, 2016-2022, pgs 322-323

It is noted in the Development Plan that all apartment floor area measurements are taken from internal wall-to-wall dimensions. The proposed development does not meet the minimum floor area requirements in respect of studio units and 2-bedroom (3 person) units. Please refer to the Material Contravention Report submitted with this application for further details in this regard.

However, on the basis that the subject proposal presents high-quality and desirable housing options across a range of housing types, as well as sufficient high-quality amenity space, that although the proposed scheme does not meet the Development Plan's requirements in relation to some of the minimum floor areas for apartment units, it is noted that the proposed scheme is consistent with SPPR 3 of the 2020 Apartment Guidelines in relation to the internal space standards

Mix of Residential Units

The Development Plan notes that each apartment development shall contain:

- A maximum of 25-30% one-bedroom units; and
- A minimum of 15% three or more bedroom units.

The proposed apartment scheme includes c. 196 no.1-bed units and 2 no. studio units which amounts to c. 59% of the overall total. 9 no. 3 bed units are proposed as part of the overall scheme.

While it should be noted that under SPPR 8 (i) of the Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments there is no restriction on dwelling mix for Build-to-Rent development, the proposed development does materially contravene the Development Plan in terms of residential unit mix.

However, it is considered that the delivery of high-quality residential units across a mix of unit types within a key site setting will create a new urban neighbourhood with a distinctive sense of place in accordance with Policy SC14 of the Development Plan that seeks *"To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces"*.

In this regard, the subject proposal presents high-quality and desirable housing options across a range of housing types, responding to the need to cater for smaller average household sizes. Therefore, although the proposed scheme does not meet the Development Plan's requirements in relation to the provision of 1-bed and 3-bed units, SPPR 8(i) of the 2020 Apartment Guidelines disapplies restrictions on dwelling mix for Build to Rent (BTR) units. Please also refer to the Material Contravention Statement submitted with this application.

Aspect, Natural Lighting, Ventilation and Sunlight Penetration

Reference is made in the Development Plan to the 2015 Department Guidelines (since superseded) which outline a specific planning policy requirement that:

*"The minimum number of dual aspect apartments that may be provided in any single apartment scheme shall be 50%. In certain circumstances, usually on inner urban sites, this may be further reduced to an absolute minimum of 33% where it is necessary to ensure good street frontage and subject to high quality design."*⁶⁴

Specific Planning Policy Requirement 4 of the Apartment Guidelines (2020) provides guidance in relation to dual aspect ratios:

"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.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25h , 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."*⁶⁵

Guidance is provided in relation to the aspect and natural lighting requirements of apartment units including minimum ceiling heights and the prevention of overshadowing by adjoining buildings and/or balconies. Approximately 53% of the proposed apartment units are dual aspect, which meets the minimum requirements of the Development Plan in relation to dual aspect.

An Internal Daylight and Sunlight Analysis has been carried out by Avison Young which indicates that the levels of daylight and sunlight within the scheme perform well, with most proposed units meeting an acceptable level of amenity for this type of development. The layout and design of the proposed

⁶⁴ Dublin City Development Plan, 2016–2022, pg 324

⁶⁵ Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020, pg 15

scheme has been an iterative process and access to daylight has been an important consideration in the design evolution.

Entrance Lobbies, Circulation and Safety

Guidance is provided in relation to natural surveillance of public spaces, the design of entrances, lobbies and circulation areas and security. The proposed residential scheme has been designed to provide occupants and visitors with a strong sense of safety and security. The provision the unit blocks arranged around open space areas ensures a high level of passive surveillance.

Block Configuration

The Development Plan notes that *"there shall be a maximum of 8 units per core per floor subject to compliance with the dual aspect ratios mentioned above"*.⁶⁶ Further guidance is provided in the Development Plan regarding the layout of hallways, shared circulation areas, corridors and deck access with the key performance criterion being the quality of residential amenity.

The number of apartments per floor per core range from 3 no. to 8 no. The block configuration of the proposed scheme is broken down and illustrated in Table 14.

Block No.	Units Per Core Per Floor
1	5 no. (1 core)
2	7-8 no. (2 cores)
3	6-7 no. (2 cores)
4	6-7 no. (2 cores)
5	3 no. (1 core)
6	5 no. (1 core)
7	8 no. (1 core)

Table 14: Proposed Block Configuration

The proposed scheme is in accordance with the Development Plan in terms of the stated maximum of 8 units per core above.

The Development Plan also provides guidance regarding the layout of hallways, shared circulation areas, corridors and deck access and this guidance has been incorporated into the design of the proposed scheme with the key performance criterion being the quality of residential amenity. Please refer to the Architectural Reports submitted with this application for further detail in relation to the consistency with these factors.

⁶⁶ Dublin City Development Plan, 2016–2022, pg 325

Internal Space Configuration for Apartments

The Development Plan outlines minimum internal space requirements for living/dining/kitchen rooms, bedrooms and storage areas based on the former 2015 Apartment Guidelines. The 2 no. studio apartments at ground and first floors within Block B06 are below the Development Plan width requirement. These studio units therefore materially contravene the Development Plan in respect of the minimum internal space standards.

However, the proposed scheme is consistent with SPPR 8(i) in the 2020 Apartment Guidelines in relation to minimum internal space standards in respect of studio apartment widths. Please refer to the Material Contravention Statement submitted with this application.

Development Management Process

As set out in the Development Plan, all applications for apartment schemes shall submit a schedule as part of the planning application that details the following:

- The number and type of apartments and associated individual unit floor areas. This shall identify the proposed apartments that are at least 10% greater than the minimum floor area standard in schemes with 100 or more apartments;*
- Details of apartment aspect (dual or single) and orientation;
- Principal dimensions of each room as well as the aggregate floor areas of each room;
- Details of internal and any external storage space associated with each apartment; and
- Quantum of proposed private amenity space.⁶⁷

**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;*

A Schedule of Accommodation and a Housing Quality Assessment Schedule prepared by OMP Architects provides a detailed breakdown of the number and type of units provided, the floor areas of each unit, details of apartment aspect, principal dimensions of each room, details of storage spaces and private open spaces.

⁶⁷ Dublin City Development Plan, 2016–2022, pg 329

Safety and Security

Residential proposals should have regard to the safety and security measures outlined in Appendix 14 of the Development Plan - 'Safety Design Guidelines' and the 'Design for Safety and Security' guidance contained in the DEHLG 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007). Passive surveillance is maximised through overlooking of the public open spaces and play areas while 'leftover' pockets of land have been avoided with clear pedestrian circulation routes and distinct open spaces provided.

Making Sustainable Neighbourhoods

As noted in Section 16.10.4 of the Development Plan, proposals for development greater than 100 dwellings shall include an Urban Design Statement that addresses the following points:

- How any proposed access points, routes or new streets are interconnected logically with the existing local network of streets, to aid legibility, permeability and walkability and complement local 'desire lines';
- How the development will contribute positively to the quality of the streets and public spaces surrounding it; this should include graphic material showing how the development will contribute to the character of the street and its activity and to the quality of the pedestrian environment;
- How the development will contribute to a coherent enclosure for the street or public space including consideration of the proportions and activities of the buildings on both sides of a street or surrounding a public space;
- How the proposals impact on, or are affected by, other planned development in the local area. Where a number of developments are proposed in proximity to each other, they may have the potential to cumulatively exert significant change on a neighbourhood. Where this is the case, any potential conflicts or opportunities for synergies or economies should be examined;
- How the layout and design of buildings, public realm or infrastructure respond to the series of non-prescriptive questions as set out in the DEHLG's Urban Design Manual, to be considered during the key stages of the design and planning process; proposals should also demonstrate how they address the principles as set out in the Neighbourhood Section of the Urban Design Manual; and

- How communal amenity spaces within residential developments are designed to be clearly distinct from fully public spaces and their scale and activities appropriate so as to fit within the local network of planned or existing public spaces.⁶⁸

A Design Statement prepared by OMP Architects provides an assessment of the proposed development against the 12 design criteria in the 'Urban Design Manual – A Best Practice Guide (2009)' including Context, Connectivity, Inclusivity, Variety, Efficiency, Distinctiveness, Layout, Public Realm, Adaptability, Parking and Detailed Design.

⁶⁸ Dublin City Development Plan, 2016–2022, pg 332

7. Conclusion

7.1 This Planning Report has provided an outline of the Site Location and Description, Planning History, Pre-Application Consultations with the Planning Authority, a Description of the Proposed Development, and a Statement of Consistency with Planning Policy. Reference should also be made to the Material Contravention Statement submitted with this application.

7.2 The development of the proposed scheme accords fully with the national policy shift away from current patterns of development towards sustainable compact urban growth within the footprint of existing settlements. It is submitted that the proposed development is consistent with the relevant strategic planning policy framework and is in accordance with the proper planning and sustainable development of the area for the following reasons:

- The proposed scheme will deliver a sustainable, high density residential development within the existing footprint of Dublin City, in accordance with the objectives of the NPF that seek to provide new housing within the built-up footprint of existing settlements, particularly in Ireland's five main cities.
- The provision of a residential development of increased height and density at this location will contribute towards the ongoing consolidation of the City, which is consistent with national and regional policy that seeks to shift the current patterns of development towards sustainable, compact urban growth and to build inwards and upwards, rather than outwards.
- The proposed development will provide for a more efficient use of land on what is currently an underutilised urban site. The provision of a high-density development in close proximity to public transport including Luas and Dublin Bus, is consistent with national policy and the requirement to integrate land use planning and transport planning.
- By placing people nearer to employment, services, and amenities, the proposed scheme will prevent urban sprawl and lead to increased efficiency and sustainability in the use of energy and public infrastructure.
- It has been demonstrated that the proposed scheme has been designed to accord with the requirements of the Development Plan with the exception of building height, unit mix, private amenity space, car parking standards, studio apartment widths, and unit floor areas. The provision of a residential development of increased height and scale is, however, consistent with national and regional policy and presents a unique opportunity to provide a residential

development with strong architectural merit at a strategic location in Dublin City, that is consistent with the pattern of development in the area.

- The proposed development, incorporating 335 no. Build to Rent residential units, represents an urban housing solution to the challenges of meeting the housing needs of a growing population, a long term move towards smaller average household size, an ageing and more diverse population and a higher proportion of households in the rented sector.
- The proposed scheme has been through an iterative design process including pre-application meetings with the planning authority and An Bord Pleanála ensuring feedback has been incorporated into the scheme.
- A key design feature of the proposed development will see the delivery of a new urban canal-side parkland setting with increased vibrancy and permeability for all residents and visitors in the area, and which will be in close proximity to extensive community infrastructure.

7.3 Ministerial Guidelines issued under Section 28 of the 2000 Act, as well as Government policy, signal a shift away from blanket height restrictions to performance-based criteria in order to achieve compact urban growth by 'building inwards and upwards' within the footprint of existing settlements, preventing urban sprawl. It is also noted that the proposed development is located in close proximity to Dublin City Centre, public transport services and several major employment centres. The proposed scheme delivers high-density in a serviced city location, as promoted in national policy. It will benefit from investment in public infrastructure while also supporting the viability of public transport infrastructure, further linking land use and transport planning. Furthermore, the subject proposal presents attractive and desirable housing options across a range of household types responding to the need to cater for smaller average household sizes.

7.4 Having regard to the above, it is considered that the proposed development at the White Heather Industrial Estate represents a unique opportunity to provide for a vibrant and diverse community, while delivering a connected residential neighbourhood which knits in to both the established and the emerging residential developments in the area, while benefitting from high-quality amenity space along the Grand Canal and access to high-quality transport linkages. Therefore, it is considered that the proposed development is consistent with national policy and accords with the proper planning and sustainable development of the area.

Appendix I - Dublin City Development Plan 2016-2022 Objectives Considered

Objective Reference	Objective
Land Use Zoning Objective Z1	To protect, provide and improve residential amenities.
Land Use Zoning Objective Z9	To preserve, provide and improve recreational amenity and open space and green networks
QH7	To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area
QH8	To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area
GI13	To develop linear parks, particularly along waterways, and to link existing parks and open spaces in order to provide green chains throughout the city. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.
GI5	To promote permeability through our green infrastructure for pedestrians and cyclists.
SC13	To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods,

	quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities
SC14	To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces
SN17	To facilitate the provision in suitable locations of sustainable, fit-for purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area

Appendix II - Ministerial Guidelines Considered

Guidelines
Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018
Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, 2009
Urban Design Manual - A Best Practice Guide (2009)
Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)
Guidelines for Planning Authorities on Childcare Facilities (2001)
Design Manual for Urban Roads and Streets (2013)
Architectural Heritage Protection - Guidelines for Planning Authorities (2011)
The Planning System and Flood Risk Management - Guidelines for Planning Authorities (2009)

Appendix III – Part V Provision

Mr. Brian Maher
Avison Young Planning and Regeneration Limited
Brian.Maher@avisonyoung.com
Sent by email

17th September 2021
Part V Ref: 935

Re: White Heather Industrial Estate, South Circular Road, Dublin 8
Applicant: U and I (White Heather) Limited, 4 Pembroke Street Upper, Dublin 2
Agent: Avison Young, 2-4 Merrion Row, Dublin 2

Validation Letter – Part V

Dear Sir / Madam,

Avison Young Planning and Regeneration Limited intends to lodge a planning application on behalf of their client, U and I (White Heather) Limited, to develop a site located at White Heather Industrial Estate, South Circular Road, Dublin 8.

Avison Young Planning and Regeneration Limited on behalf of U and I (White Heather) Limited, has engaged in Part V discussions with Dublin City Council and an agreement in principal to comply with their Part V requirement has been reached.

Dublin City Councils preferred option is to acquire units on site and is bound by the planning permissions granted. Therefore Dublin City Council can only agree in respect of the actual permitted development.

I would be obliged if you could validate this planning application.

If you have any further queries regarding this application, please contact me on 01 - 222 2458.

Yours sincerely,

pp. N.Satell

Lorraine Gaughran
Housing Development

Order of Costs Nr.2 (Block 1 & 5 Only)

for

White Heather

for

U+I

1 April 2021



Order of Costs Nr.2 (Block 1 & 5 Only)

for

White Heather

for

U+I

1 April 2021

Project Name:	White Heather	Client:	U+I
Report Type:	Order of Costs	Client Contact(s):	Arlene Van Bosch
Project Number:	1120068		

Nr.	Ref Name	Status	Date:	Details			
1	Order of Costs Nr. 2	Issue	1 Apr 21	Filepath:	\\10.5.12.7\Projects\2. PROJECTS\2020\1120068 - White Heather\1. Cost Plans\2. OMC ~ Cost plan Nr 2\2. Costs\Cost Plan Nr.2 - Block 1 & 5 Extract\1120068 - White Heather - Cost Plan Nr.2 (14.05.21) Issued.xlsx		
				Description:	Cost plan for Part V works at White Heather and associated site development works.		
				Communication:	Issued:	Presented:	
					01/04/2021	01/04/2021	
				Quality Assurance:	Prepared by:	Checked by:	Approved by:
					J Cronin	P Blennerhassett	AMCD

1 April 2021

(1120068/AM/PB/PD)

Mitchell | McDermott
Construction Consultants

Arlene Van Bosch
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4 Upper Pembroke Street
Dublin 2
Ireland

72 Leeson Street Upper
Dublin 4
Ireland

T: +353 (0)1 531 0370
W: www.mitchellmcdermott.com
E: advice@mitchellmcdermott.com

White Heather - Order of Costs Nr.2 (Block 1 & 5 Only)

Directors

Dear Arlene,

Paul Mitchell
Bsc MRICS MSCSI; Dip Con Law

Please find attached a copy of Order of Costs Nr.2 (Block 1 & 5 Only) for the above.

Anthony McDermott
Bsc Dip Const Econ. MCIOB MAIQS

Thank you for your instruction in this regard.

Michael Gallagher
Bsc (Hons) Const Mgmt. FCIOB

Yours sincerely,



Anthony McDermott

Director
for
Mitchell | McDermott



Registered in Ireland
No. 555699

CONTENTS

Introduction	1
Overall Summary	3
Block 1	5
Block 1 Elemental Summary	5
Block 1 Elemental Graphs	6
Block 5	8
Block 5 Elemental Summary	8
Block 5 Elemental Graphs	9
Narrative	11
Elemental Narrative	11
Schedule of Floor Areas	14
Exclusions	15

INTRODUCTION

status of design The design is currently at scheme design. Mitchell McDermott received floor plans, sections and elevations from O'Mahony Pike on the 15th March 2021, structural sketches from O'Connor Sutton Cronin on the 24th March 2021 and landscaping drawings on the 22nd March 2021.

basis of cost Mitchell | McDermott carried out an elemental measure of the basement, all blocks and external works to arrive at a cost per square metre that is based on a particular scope.

Our costs are based on similar projects we have tendered in the Greater Dublin Area. The elemental breakdown of each of these blocks is included in this report. Please note we have not included for fit-out works the the Creche areas included in Block 5, this is left as "Grey Box".

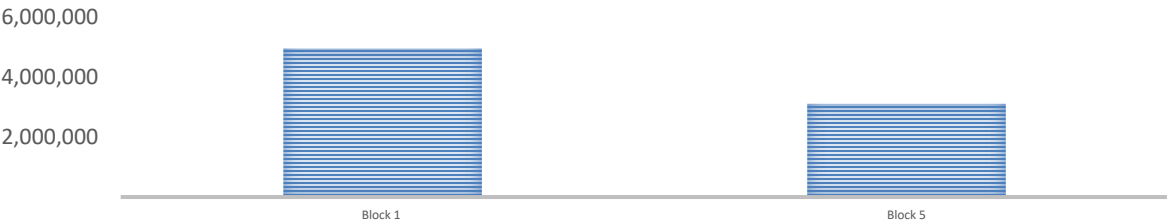
cost update This Cost Plan includes for Block 1 & Block 5 only.

Overall Summary

OVERALL SUMMARY

overall summary The total construction costs for the project are summarised below. Please read in conjunction with Narrative and Exclusions.

Section	GFA (sq ft)	GFA (sq m)	Unit Cost (Sq ft)	Unit Cost (Sq m)	Total €
Block 1	19,806	1,840	€250/sq ft	€2,689/sq m	4,948,610
Block 5	10,274	955	€302/sq ft	€3,246/sq m	3,098,294
Sub Total - Apartments	30,080	2,795	€268/sq ft	€2,880/sq m	8,046,904
External Works & Landscaping					382,000
Sub Total	-	-	€0/sq ft	€0/sq m	382,000
TOTAL	30,080	2,795	€280/sq ft	€3,016/sq m	8,428,904

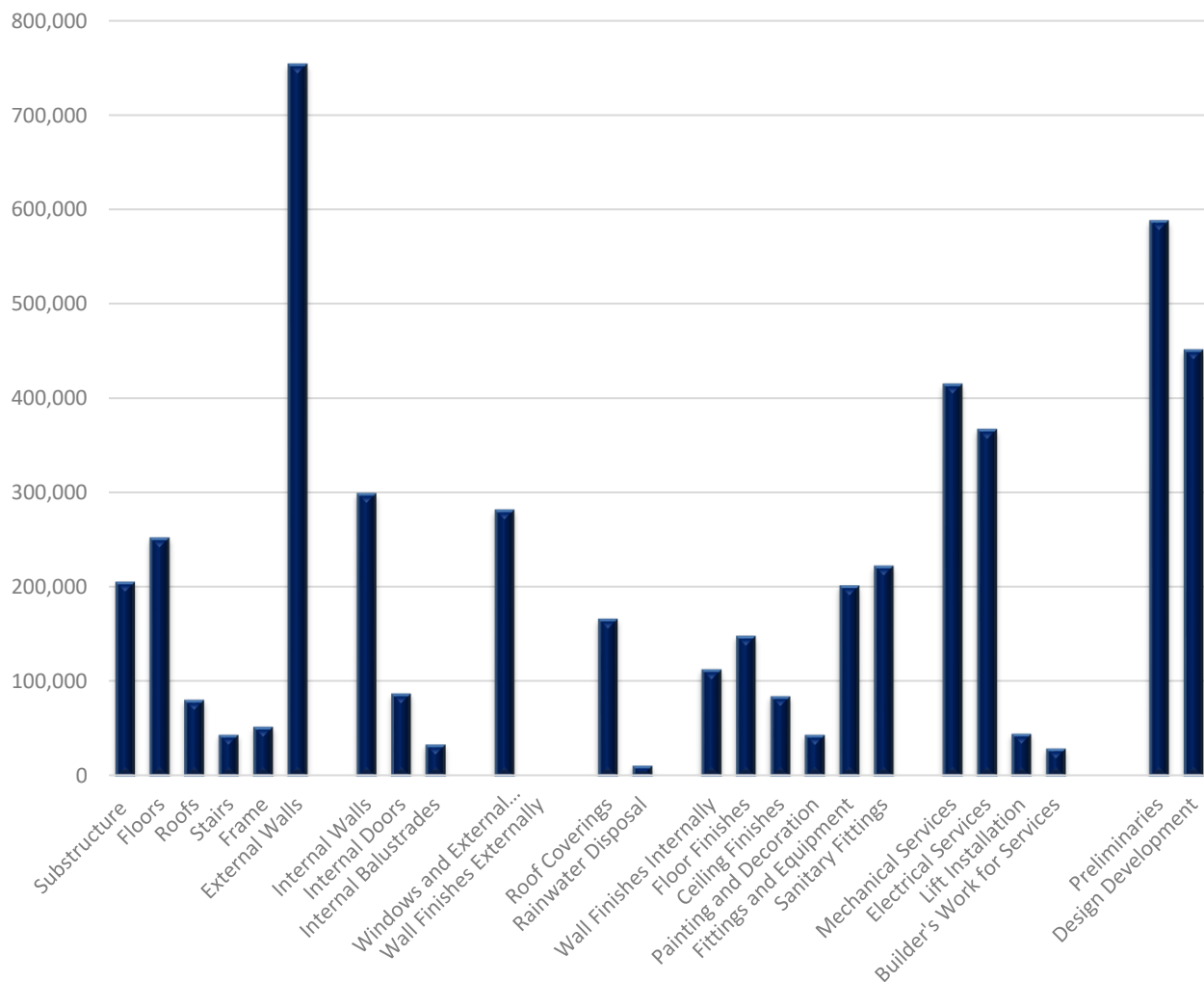
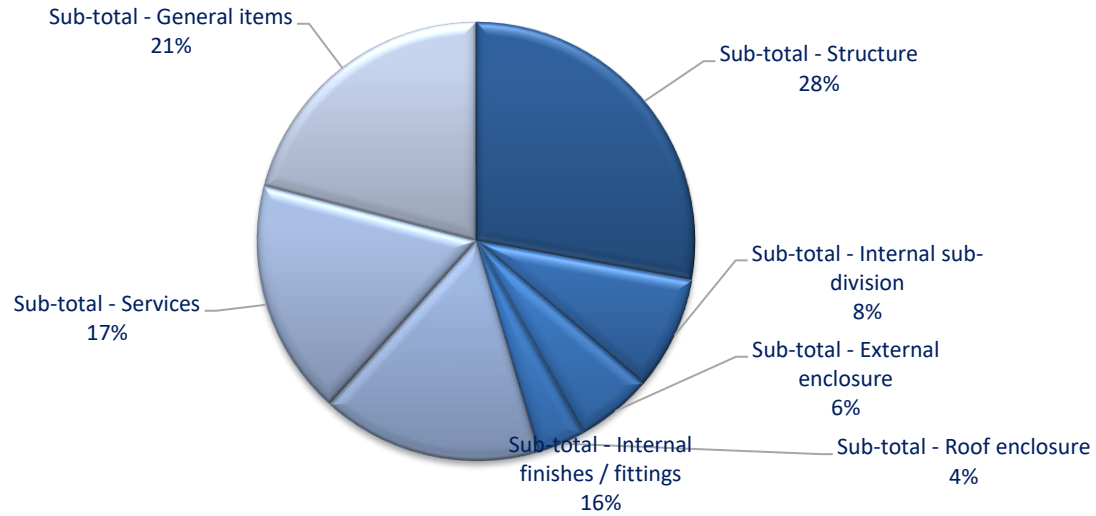


Block 1

ELEMENTAL SUMMARY - BLOCK 1

	Element	GFA: 1,840 Sq m	%	€ / sq m	€
1	Substructure		4%	110.77	203,814
2	Floors		5%	136.30	250,784
3	Roofs		2%	42.88	78,902
4	Stairs		1%	22.72	41,800
5	Frame		1%	27.32	50,261
6	External Walls		15%	409.26	753,039
	Sub-total - Structure		28%	749.24	1,378,600
7	Internal Walls		6%	161.84	297,791
8	Internal Doors		2%	46.47	85,500
9	Internal Balustrades		1%	17.12	31,500
	Sub-total - Internal sub-division		8%	225.43	414,791
10	Windows and External Doors		6%	152.28	280,200
	Sub-total - External enclosure		6%	152.28	280,200
12	Roof Coverings		3%	89.55	164,780
13	Rainwater Disposal		0%	4.98	9,172
	Sub-total - Roof enclosure		4%	94.54	173,952
14	Wall Finishes Internally		2%	60.31	110,970
15	Floor Finishes		3%	79.75	146,747
16	Ceiling Finishes		2%	44.96	82,725
17	Painting and Decoration		1%	22.64	41,655
18	Fittings and Equipment		4%	108.77	200,130
19	Sanitary Fittings		4%	120.11	221,000
	Sub-total - Internal finishes / fittings		16%	436.54	803,227
20	Mechanical Services		8%	224.84	413,714
21	Electrical Services		7%	198.79	365,773
22	Lift Installation		1%	23.21	42,713
23	Builder's Work for Services		1%	14.83	27,282
	Sub-total - Services		17%	468.03	861,174
	SUB-TOTAL - BUILDING		79%	2,126.06	3,911,944
24	Preliminaries	15.00%	12%	318.91	586,792
25	Design Development	10.00%	9%	244.50	449,874
	Sub-total - General items		21%	563.41	1,036,666
	TOTAL - BUILDING (exc VAT)		100%	2,689.46	4,948,610

See Exclusions on page 15

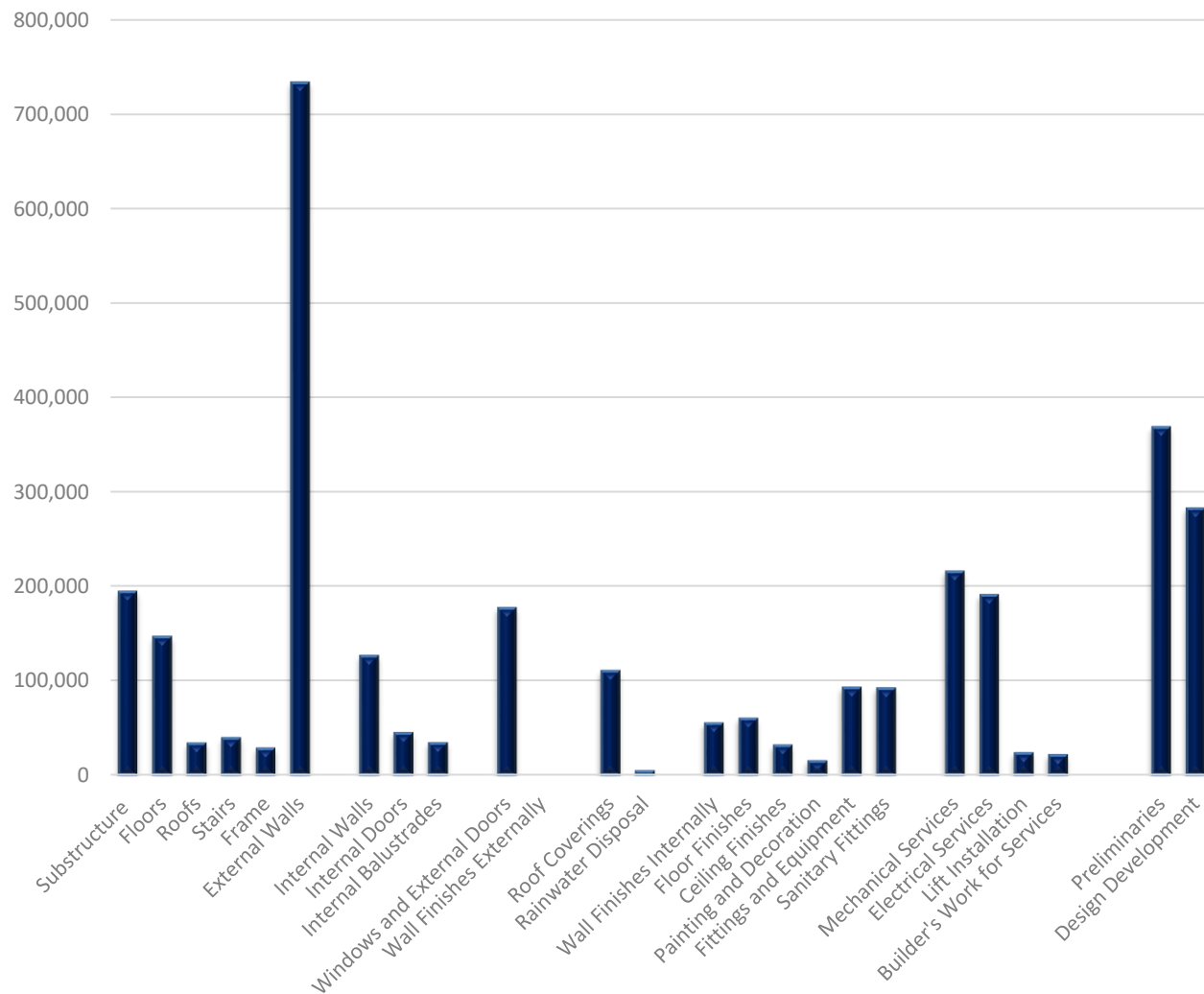
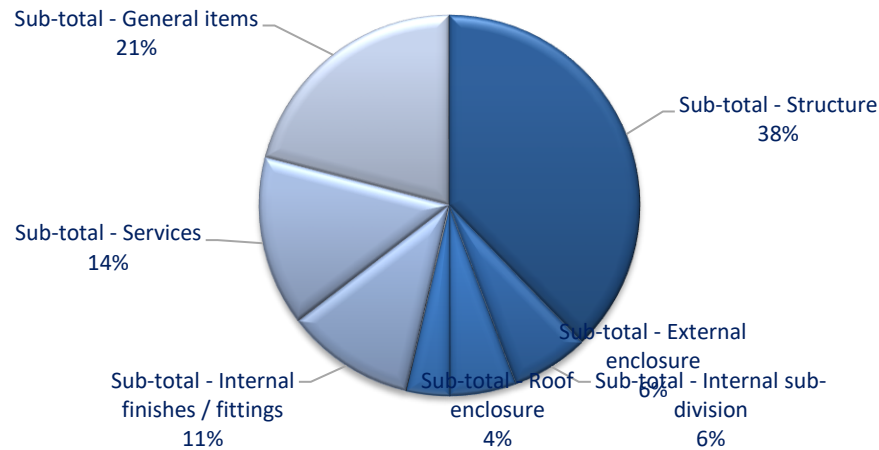
ELEMENTAL SUMMARY - BLOCK 1

Block 5

ELEMENTAL SUMMARY - BLOCK 5

	Element	GFA: 955 Sq m	%	€ / sq m	€
1	Substructure		6%	202.52	193,306
2	Floors		5%	152.51	145,572
3	Roofs		1%	34.21	32,656
4	Stairs		1%	40.34	38,500
5	Frame		1%	28.69	27,387
6	External Walls		24%	767.76	732,831
	Sub-total - Structure		38%	1,226.04	1,170,251
7	Internal Walls		4%	131.63	125,644
8	Internal Doors		1%	45.68	43,600
9	Internal Balustrades		1%	34.73	33,150
	Sub-total - Internal sub-division		7%	212.04	202,394
10	Windows and External Doors		6%	184.34	175,950
11	Wall Finishes Externally		0%		
	Sub-total - External enclosure		6%	184.34	175,950
12	Roof Coverings		4%	114.72	109,497
14	Rainwater Disposal		0%	3.73	3,556
	Sub-total - Roof enclosure		4%	118.44	113,053
15	Wall Finishes Internally		2%	56.58	54,005
16	Floor Finishes		2%	61.82	59,008
17	Ceiling Finishes		1%	32.16	30,700
18	Painting and Decoration		0%	14.52	13,860
19	Fittings and Equipment		3%	96.25	91,870
20	Sanitary Fittings		3%	95.34	91,000
	Sub-total - Internal finishes / fittings		11%	356.67	340,443
21	Mechanical Services		7%	224.96	214,726
22	Electrical Services		6%	198.89	189,844
23	Lift Installation		1%	23.42	22,355
24	Builder's Work for Services		1%	21.19	20,229
	Sub-total - Services		14%	468.47	447,154
	SUB-TOTAL - BUILDING		79%	2,566.00	2,449,244
25	Preliminaries	15.00%	12%	384.90	367,387
26	Design Development	10.00%	9%	295.09	281,663
	Sub-total - General items		21%	679.99	649,050
	TOTAL - BUILDING (exc VAT)		100%	3,245.99	3,098,294

See Exclusions on page 15

ELEMENTAL SUMMARY - BLOCK 5

Narrative

NARRATIVE

outline of scope The following is an outline of the scope and general specification accounted for within this detailed Order of Magnitude Cost exercise. The level of specification and the provisional allowance included within this OMC are subject to change as the design develops. Where design is still to be developed we have made assumptions.

Residential Blocks

design status The current design is at pre-planning stage. We have carried out an elemental measure of all blocks based on the general arrangement plans, sections and elevations received from O'Mahoney Pike Architects (OMP) on 15.03.21.

structure We have received outline structural mark up from OCSC for the residential apartment blocks. The scheme is an RC structure generally comprising 250mm deep RC slab, RC columns and metsec external wall.

envelope An allowance of €480/m² is included. This allowance will cover a metsec internal leaf, cavity build up and brick outer leaf.

Glazing is included at €450/m², this assumes an Aluclad type double glazed system or similar.

roof We have assumed the roof structure, similar to the floors is made up of an RC concrete slab. A screed to falls has been included with 140mm insulation and a "Bitumen warm roof system". There are allowances for roof gardens to areas shown on the Architect drawings. Allowances have been made for green roofs in line with the landscape design.

internal sub-division We have included allowances for stud partition walls.

internal wall finishes We have allowed for a painted plaster finish to the internal face of all external walls. All internal sub divisional partitions have also been plastered and painted throughout. We have allowed a tiled splash back to the kitchens. All internal finishes to the bathrooms and en-suite are captured within the pod allowances.

internal floor finishes We have included the following floor finishes to the residential units; Carpet has been included to common area corridors. We have included for a Rugpol underlay to all carpet areas. We have allowed for an Amtico type floor finish within the living spaces of the residential units.

We have allowed for a Regipol or similar approved sound insulation layer throughout the blocks. We have allowed for a painted MDF skirting throughout. All internal finishes to the bathrooms and en-suites are captured within the pod allowances. We have allowed for a recess in the floor for the bathroom pods.

internal ceiling finishes We have allowed for painted plasterboard ceiling throughout. We have assumed the provision of 2nr access hatches per apartment.

NARRATIVE

sanitary fittings We have included for concrete pods for bathrooms and ensuites throughout the scheme. These include all sanitaryware and tiling. An allowance of €6,000 per en-suite pod and €6,500 for the main pod has been included.

fittings We have included an allowance of €6,250 on average for kitchens throughout the apartments which should achieve a good specification for the units. We have included an allowance of €850 per apartment bedroom for built in wardrobes.

mechanical services We have included the following allowances for the mechanical works to each apartment, exclusive of MCD:

	€
Studio	11,110
1 Bed	11,820
2 Bed	12,490
3 Bed Duplex	21,780

In addition to the above we have included allowances for landlord plant, tenant amenity and retail shell & core. We have also included for Sprinklers.

electrical services We have included the following allowances for the electrical works to each apartment, exclusive of MCD:

	€
Studio	6,280
1 Bed	7,625
2 Bed	8,845
3 Bed Duplex	9,145

In addition to the above we have included allowances for landlord plant, tenant amenity and retail shell & core.

lifts An allowance of has been included for lifts in each of the cores.

preliminaries An allowance of 15% for preliminaries has been included. This is currently the market average for preliminaries in the Greater Dublin Area.

contingency A 10% design development allowance is included. This will reduce during the design period.

NARRATIVE

External Works

external works We have measured the external works as per the outline GAs provided by BS Larch.

We have included all paving, planting and fixtures and fittings as per BS Larch drawings dated 22.03.2021.

An allowance has been made for the site structures shown i.e. 2nr pergolas, bike shed, play and fitness equipment.

We have included allowances lighting, bollards, timber sculpture. We have also made allowances for all trenching and duct work required for services.

For the purposes of this cost plan the overall site works have been pro-ratad with Block 1 and Block 5.

GROSS FLOOR AREAS

gross floor areas The following gross floor areas were used in the cost plan.

BLOCK 1

	Sq ft	Sq m
Ground Floor	4,306	400
1st Floor	4,036	375
2nd Floor	4,036	375
3rd Floor	4,036	375
4th Floor	3,391	315
	<u>19,806</u>	<u>1,840</u>

1,840 sq m

Net Floor Area	1,460 sq m
Net / Gross	79%
Nr. of Apts	24 <i>Avg. 61 sq m</i>
Nr. of Cores	5
Apts/Core	4.80

BLOCK 5

	Sq ft	Sq m
Ground Floor	2,072	193
1st Floor	2,390	222
2nd Floor	2,153	200
3rd Floor	2,153	200
4th Floor	1,507	140
	<u>10,274</u>	<u>955</u>

955 sq m

Net Floor Area	601 sq m
Net / Gross	63%
Nr. of Apts	12 <i>Avg. 50 sq m</i>
Nr. of Cores	5
Apts/Core	2.40

EXCLUSIONS

exclusions The following items are excluded from the Cost Document:

1. VAT
2. Tender Inflation from Apr 2021
3. Site Acquisition
4. Planning and Statutory Fees
5. Development Contributions
6. Capital Contributions for Services connections
7. Bonds
8. Professional Fees
9. Sales and Letting Costs
10. Marketing
11. Legals
12. Valuers
13. Part V
14. Accountancy Costs
15. Finance Costs
16. Homebond
18. Show Units
19. Owner Insurances
20. Adjoining Neighbour Costs
21. Sound insulation to floors in apartments
22. No Fit Out to Commercial areas (cold shell only)
23. Load bearing piles (assumed sufficient load bearing capacity in rock)
24. Smart Homes installation.
25. Contaminated material over €750,000 allowance
26. TV's within each apartments
27. Bed linen, cutlery, mattresses
28. Phasing
29. Water prevention methods required to undercroft

Contact Details

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