

**Site at East Wall Road,
Dublin 3**

**Planning Report to Accompany
a Part 8 Application for
Residential Development**

Social Housing Bundle 3

February 2022

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1 Introduction

1.1 Legislative Background

Part XI of the Planning and Development Act 2000 as amended and the procedures set out in Part 8 of the Planning and Development Regulations 2001 as amended, relate to development by, on behalf of, or in partnership with the Local Authority. Under Section 178 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out its own development, provided it does not materially contravene the Development Plan. MacCabe Durney Barnes have been commissioned by the National Development Finance Agency in partnership with Dublin City Council to prepare a report to accompany the Part 8 submission.

1.2 Background to the Part 8 application

The Social Housing PPP programme consists of the design, construction, financing and maintenance of approximately 1,500 homes in 3 project bundles of social housing developments on sites around Ireland to be delivered by Public Private Partnership (PPP). The Department of Housing, Local Government and Heritage is the approving authority for the programme with the NDFA as financial advisor, procuring authority and project manager.

The current bundle No. 3, includes 6 sites, 3 of which are in the Dublin City Council area. The PPP model of delivery has been selected as an appropriate means of securing the delivery of social housing. Each site includes a mixture of housing typology (for example apartment, duplex, detached or semi-detached house) and site development works. The East Wall site has a mixture of apartments and duplex units.

The East Wall site is one the three Dublin City Council sites in the social housing bundle. The development will be tenanted from Dublin City Council's Housing Lists, in accordance with the scheme of allocations. The proposed development has been designed by the National Development Finance Agency (NDFA) in consultation with Dublin City Council.

1.3 Structure of Planning Report

This planning report was prepared on behalf of the NDFA and Dublin City Council to accompany a Part 8 application for the development of 68 social housing units at a site c. 0.55 ha located on East Wall Road, Dublin 3.

This report is structured as follows:

- It provides a description of the site and surrounding area, and of the proposed development.
- It outlines how the development complies with:
 - National policy,
 - Regional policy; and
 - Local policy.
- It provides an outline of the traffic and transportation consideration.
- It provides an outline of drainage and water supply.
- It provides a review of environmental matters, including ecology, environmental impact assessment and appropriate assessment, and other considerations, such as waste and public lighting.

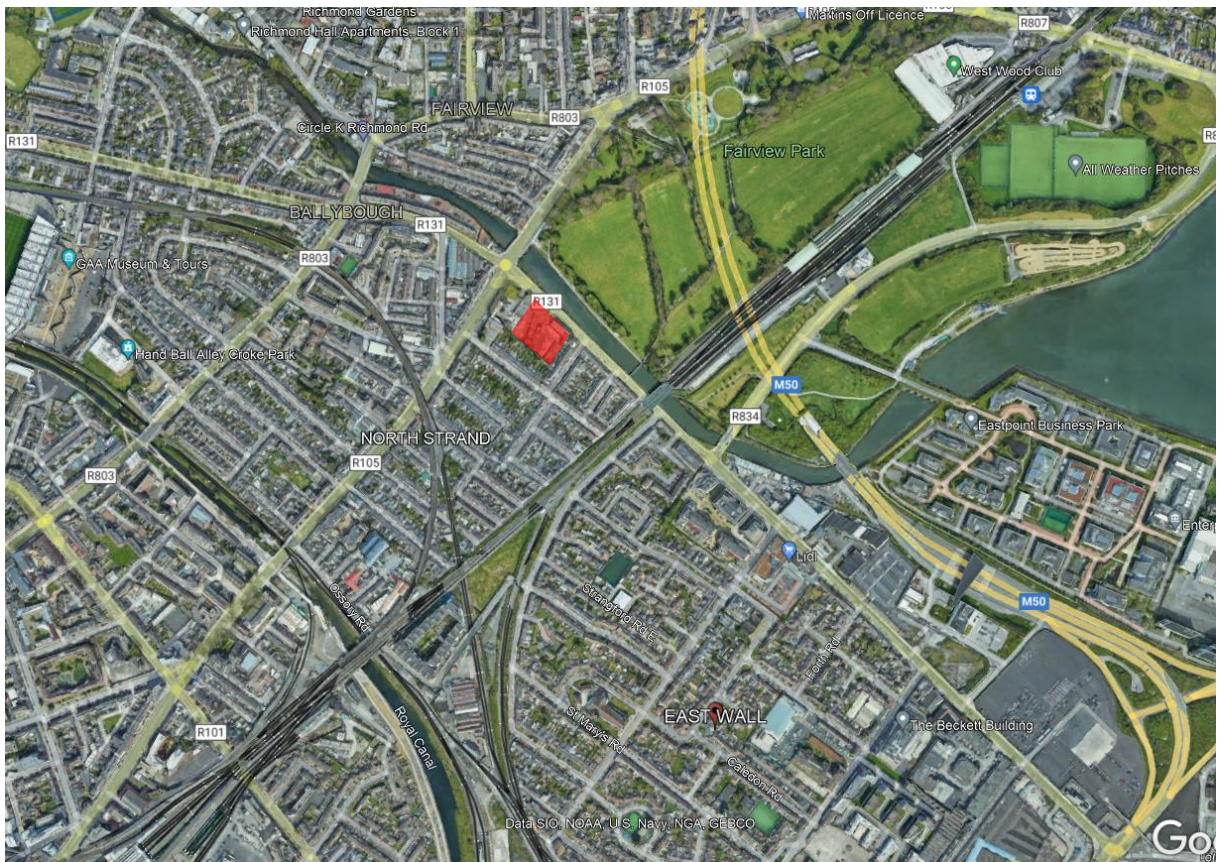
2 Site Description and Surrounding Area

2.1 Location and Surroundings

The site of c. 0.55 ha is located c. 1.5 km north of Dublin City Centre. The North Strand Fire Station abuts the site to the west. The site's principal frontage is to its north on East Wall Road and faces the Tolka River. This boundary consists of a poor quality concrete wall topped with railing behind which a row of trees is planted. The east of the site is bounded by the rear gardens of Hope Avenue, a street comprising typical 1940s terraced housing. The south of the site is bounded by the rear gardens of Leinster Avenue, which comprises single storey cottages. There is an existing entrance via East Wall Road. The principal frontage of the site is north facing.

The site avails of excellent transport connectivity being located close to the North Strand, a high frequency bus corridor. A bus stop is located at the fire station. It also avails of excellent cycle links, owing to its proximity to the North Strand and to the new cycleway connecting the North Strand to the Docklands which is along East Wall Road.

Figure 1: Site Location (outlined in red)



The nearest Natura 2000 sites are as follows:

- South Dublin Bay and River Tolka Estuary SPA (site code 4024) – 0.6km to east
- South Dublin Bay SAC (210) 3.1 km south-east
- North Dublin Bay SAC (206) - 3.7 km east
- North Bull Island SPA (4006) - 3.7 km east

The subject site is located in a district centre located on the North Strand Road, at the intersection with East Wall Road. The Ballybough Community Centre is located less than 450m west of the site. A number of supermarkets are located further east on East Wall Road, just over 500m away from the site. Saint Columba’s National School is located 450m south-west of the site, just of the North Strand. The East Wall Youth Club is located some 700 south east of the site.

2.2 The Subject Site

The site totalling 0.55 ha was formerly operated as concrete batching plant and it has been vacant since 2006. It can therefore be classified as a brownfield site. There is a two-storey flat roofed brick building to the front of the site totalling 297 sqm with a 85 sqm return. In addition, there is an ESB substation, and the remnants of other demolished buildings. The site currently has a variety of surfaces including concrete ground slabs, ramps and plinths. There is also an oil tank on site.

The site levels vary from 2.69m AOD at its western end where it connects to the Fire Station and 3.7m AOD at the eastern end. The generalised succession of strata underlying the site includes approximately 0.50m of concrete underlain by made ground between 0.50 and 4.20mbgl. The made ground varied in composition and compaction across the site and was generally described as building rubble with clay and gravel but containing a high percentage of brick, plaster, ceramics, glass, slate, timber, wire, metal, paper etc.

Figure 2: East Wall Site Location



Plates 1 to 6 illustrate the site and adjoining area.

Plate 1 - Looking south – along East Wall



Plate 2 – Looking south toward the Rear Gardens of Hope Avenue



Plate 3 Looking east – toward the Fire Station



Plate 4 Former Concrete Batching Plant area



Plate 5 – Looking east towards Fire Station



Plate 6 – East end part of Site



2.3 Planning History

2.3.1 Subject Site

The relevant planning history on the subject site is outlined below. The previous refusal in 2005 for a private development up to 12 storeys has been fully considered in the current design proposal on the subject site. The current proposal is a fundamentally different design where the development addresses East Wall Road at an appropriate height, in accordance with the National Planning Framework, City Development Plan and relevant guidelines.

PA.Reg.Ref.4426/05: Planning permission was refused for the demolition of a concrete batching plant and 2 no. office blocks totalling approx. 600 sq.m. and the construction of 130 no. apartment units, made up of 11 no. 1 bedroom units, 89 no. 2 bedroom units and 30 no. 3 bedroom units, in an arrangement of 6 and 12 storey blocks. Balconies are to be provided on all floors above ground level to the front and rear of the proposed building. 214 no. underground car parking spaces and revised vehicular entrance off East Wall Road at 5/23 East Wall Road, Dublin 3. at 5-23, East Wall Road, Dublin Port, Dublin 3.

Figure 3: Layout of PA.Reg.Ref.4426/05 (source: Planning Register)



Figure 4: Elevation of PA.Reg.Ref.4426/05 (source: Planning Register)



Reasons for refusal included:

1. *The proposed development consists of blocks of 6 and 12 storeys in height of very poor quality, monolithic and horizontal design, with no relationship to East Wall Road, which are of an overbearing and visually obtrusive scale that would be contrary to Section 15.1.0 of the Dublin City Development Plan 2005-11, and which would seriously injure the streetscape at this location, seriously injure the amenities of dwellings in the vicinity and seriously injure the amenities of the area. Therefore, the proposed development would be contrary to the proper planning and sustainable development of the area.*
2. *The proposed development, including the 12 storey element, is of very poor design quality, does not relate to the street, does not fit-in with existing or evolving streetscape in this area and is completely flawed in urban design terms. The proposal completely fails to meet any of the criteria provided Section 15.6.0 "Special Standards applying to medium and high rise buildings" of the Dublin City Development Plan 2005-11 and would seriously injure the amenities of the area. Therefore, the proposed development would be contrary to the proper planning and sustainable development of the area.*
3. *The proposed development provides a high proportion of single aspect apartments which would be contrary to Section 15.9.4 Layout of Apartment Developments (Daylight and Sunlight) of the Dublin City Development Plan 2005-11 and, therefore, contrary to the proper planning and sustainable development of the area.'*

VS0117: The site was entered on the vacant site register on 31/03/2017.

2.3.2 Neighbouring Sites

PA.Reg.Ref: 3900/18 (ABP Ref:PL29N.304256): Planning permission was granted in 2018 for a six storey block of 52 build to rent apartments on the site of the former car dealers on Poplar Row. This building is now under construction.

PA.Reg.Ref.2213/20: Planning permission was granted in 2018 (PA Reg.Ref3601/18) for development of a five storey block containing 14 apartments on the site of the former AIB bank on the junction of North Strand and Poplar Row. A flood risk assessment was undertaken for the development. It had a finished floor level of 4mAOD. Furthermore, it was the subject of a Stage 1, AA screening assessment and no Stage 2 NIS was required. This grant permitted an amendment to add a further floor. The figure below illustrates PA.Reg.Ref.2213/20 and the adjoining development permitted under P.A Reg.Ref: 3900/18.

Figure 5: Permitted Development at North Strand/Poplar Row



Source: Planning application P.A.Reg.Ref:2213/20

ABP Ref. 309082(PA.Reg.Ref.3516/20): A planning application for a 6/7 storey apartment building on the corner of Poplar Row and North Strand adjacent to the Tolka river was refused permission on the 8th of July 2021 for the following reason:

“The proposed development, by virtue of its design, form and massing on this prominent site and its transition with the surrounding environment, is considered to be visually obtrusive and not of adequate architectural quality, to the detriment of the amenities and character of the surrounding area and, as such, would be contrary to the provisions of Section 16.2.1 of the Dublin City Development Plan 2016 - 2022, which requires that such development proposals would have regard to the character of adjacent buildings, the spaces around and between them and the character and appearance of the local area. It is considered that the proposed development, both by itself and by the precedent it would set for other development would, therefore, seriously injure the amenities of property in the vicinity, would seriously injure the streetscape and the Tolka Conservation Area, would be contrary to the provisions of the Development Plan and would be contrary to the proper planning and sustainable development of the area. In deciding not to accept the Inspector's recommendation to grant permission, the Board did not concur with the Inspector that the design of the proposed development would not unduly impact on the amenities of the surrounding area or be visually obtrusive.”

Figure 6: Refused Scheme at Annesley Bridge.



Figure 6. View C of site from east on Junction with East Wall Road with the approved development on the AIB site

Source: planning application PA.Reg.Ref.3516/20

PA. Reg.Ref:3091/20: Planning permission was granted in 2020 for a 15 storey hotel, 2 residential/commercial blocks of 8 and 10 storeys with a total of 76 apartments, 1,893 sqm of commercial over a basement car park all at the commercial premises at the junction of Alfie Byrne Road and East Wall Road.

Generally, it can be seen that the area is in transition with new development of 6 storeys plus, particularly on North Strand Road and Poplar Road and also to the east at the intersection of the Alfie Byrne Road and East Wall Road. This urban rather than suburban form is appropriate in the area, as it supports consolidation and increased densities in an area that is well served by public transport and services.

3 Proposed Development

The proposed development is described as follows:

The demolition of existing industrial-type structures (c. 382 sqm in total) to enable the construction of 60 apartments and 8 duplex units in 2 blocks as follows:

One block ranges from 3 to 6 storey high and fronts East Wall Road. It includes 60 units (13 no. 1-bed; 28 no. 2-bed and 19 no. 3-bed).

- One duplex terrace block is 3 storey high and located to the west of the site. It includes 8 duplex units (4 no. 1-bed and 4 no. 3 bed).

The proposed development also includes surface car parking (34 spaces), communal open space, boundary treatments, public lighting, site drainage works, internal road surfacing and footpath, ESB substation, bin and bicycle storage, landscaping, play area and all ancillary site services and all ancillary site services and development works above and below ground.

The proposed development is shown below.

Figure 7: Proposed layout and Landscape Plan



Source: Mitchell & Associates

In summary, the proposed development has been designed to provide high quality homes in a mix of one, two and three bedrooms at a density of 135 units per ha on an infill site fronting East Wall Road. Dublin City Council will give consideration to the allocation of the 1 bed units within the proposed development as Senior Citizen Housing. This will be subject to an assessment of local housing need when the development is ready for tenancing. The design of the scheme allows for possible future development on the adjacent Fire Station site.

The design ranges from three to six storeys stepping down to the south-east to integrate with the lower density two storey housing at Hope Avenue and the junction of East Wall Road. The proposed development is broadly L shaped providing an overlooked courtyard of communal open space centrally within site including landscaping, play area, cycle and car parking. A new urban edge will be created on East Wall Road on a vacant brownfield site.

The flood risk analysis for the site deems that the lowest finished floor level for all ground floor apartments is to be +4.15m. In order to make the wider site optimally accessible, it is proposed that the entire site is to be raised to approximately this level. At the street frontage, an access ramp and steps has been sensitively integrated into the architectural language of the building plinth, providing access to both the common cores and to ground floor UD apartments.

The East Wall frontage will overlook Fairview Park on the opposite side of the Tolka river and will transform this vacant site into a new vibrant residential scheme close to the city and amenities.

4 Policy Background

4.1 National Planning Framework 2040

The National Planning Framework (NPF) guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development. The National Strategic Outcomes are expressed as follows:

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

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

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

National Policy Objective 3b seeks to *"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."*

The proposed development accords with objective (3a and 3b) in the provision of new social homes within an urban context.

National Policy Objective 4 states *"ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being"*.

The proposed development accords with this objective and provides a defined strong urban frontage to both North Strand and East Wall Road. Buildings to the street edge allow for the creation of a semi-private courtyard behind the building line, screened from outside the site. The proposal includes opportunity for communal open space, play area and car parking provision. Ground floor apartments on East Wall Road above road level provides increased privacy to ground floor apartments. Private open space is provided to all proposed apartments in the form of balconies or ground floor terraces. Secure cycle parking is provided within the site.

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

The proposed development accords with this objective as the subject site is located centrally within the city and c 2 km from O'Connell Street. The proposed height compliments the recent permitted developments in the area of up to 6 storeys.

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

The proposed development accords with this policy and the scheme provides for a range of apartment types, ranging from 1 bed (2 person) to 3 bed (5 person) as social housing which allows flexibility to those having changing needs within the same community.

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

The proposed development accords with this policy in the adaption of a brown field site for residential use at an increased density.

In summary, the proposed development is on zoned lands adjacent to schools, community and civic services, playing fields and shops in Dublin City and meets the NPF objectives.

4.2 Ministerial Guidelines

A number of national planning guidelines may be considered.

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Delivering Homes, Sustaining Communities (2007) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities (2007)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)
- Urban Design Manual - A Best Practice Guide (2009) and Urban Design Manual - Best Practice Guidelines (2009)
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Streets (2013)
- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018)
- Urban Development and Building Heights- Guidelines for Planning Authorities (2018)

Those of particular relevance are detailed below.

4.2.1 Childcare Facilities – Guidelines for Planning Authorities 2001

It is noted that these are a planning guidance document only, and standards set down in relevant childcare legislation take precedence.

Section 2.4 of the Guidelines addresses appropriate locations for childcare facilities and considers that one childcare facility for every 75 units is generally appropriate. The Guidelines require the provision of childcare facilities at a ratio of 20 childcare spaces for every 75 proposed dwellings.

The provision of 68 units, 17 of which are one-bed units falls below the 75 unit threshold set out by the Childcare Facilities Guidelines for Planning Authorities (2001). Having regard to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, one bedroom apartment units should not generally be considered to contribute to a requirement for childcare provision (and subject to location this may also apply in part or in whole to two bedroom).

Excluding one bedrooms, 51 homes in a mix of two and three beds may generally require childcare in the proposed development. The Dublin Childcare Committee was consulted which identified childcare providers within a 1 km radius and the Social Infrastructure Report identifies providers within a 1.5km radius. Should Dublin City council consider it appropriate, there is the potential to adapt an apartment at ground floor into a community facility in the future.

4.2.2 *Quality Housing for Sustainable Communities (2007)*

These guidelines relate specifically to social housing. Chapter 4 indicates that in the planning and design of the scheme, the architect should:

- seek to create a high quality living environment for residents and enhance the social, environmental and visual quality of the area as a whole;
- seek to ensure a high level of safety and security for the residents through casual surveillance and overlooking;
- maximise amenity and energy efficiency by climate sensitive design;
- eliminate barriers to accessibility for all users - particularly older people and those with mobility impairment or other disability;
- seek to ensure that the scheme can be constructed, managed and maintained at reasonable cost and in a way that is economically, socially and environmentally sustainable;
- design public open space so as to maximize its potential benefit to the resident through clear definition of public, communal private open space;
- permeability as the means to achieve a high quality living environment.

A Design Statement accompanies the Part 8 documentation. The environmental and visual quality of the area as a whole will be enhanced significantly by the development of a vacant former industrial site. The proposed development has been designed cognisant that the adjacent Fire Station site may be developed in future. The development will transform a brownfield site currently defined by defensive railings and hedges into a modern urban frontage of front doors fronting onto East Wall overlooked by balconies and apartments.

All of the new apartments will be energy efficient and equipped for challenges anticipated from a changing climate. The majority of apartments are dual aspect, with at least one, and sometimes 2 facades benefitting from a south, south-east or south-west aspect to benefit solar gain. Window openings are large enough for sufficient daylight provision, without being too large to the detriment of heat loss or solar overheating.

Immediately outside the curtilage and primary façade line, an access ramp and step arrangement is integrated within the building plinth, providing compliance with Part M of the Building regulations with access to own door apartments and common cores.

The design and finishes used are simple and contemporary. The communal open space has been designed with facilities for a wide range of interests and abilities, to ensure that it is attractive to a broad spectrum of residents including benched seated area, children's play area, and some mown grass areas. There is a very clear definition of transition from public to private space. Permeability through this small urban infill site is not possible owing to size and configuration and the site is well connected to the wider city

A mix of dwelling types is proposed ranging from 1-bed to 3-bed and unit sizes have been informed by social housing needs. The schedule of accommodation sets out the size of each units proposed.

4.2.3 *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) (and accompanying Manual)*

These Guidelines contain specific policies and objectives regarding the scale and location of new residential development, the need for high quality design of residential areas, and the use and development of infill, greenfield and brownfield sites.

Section 1.9 recites general aims of sustainable residential development, including the need to prioritise walking, cycling and public transport over the use of cars, and to provide residents with quality of life in terms of amenity, safety and convenience.

Chapter 3 identifies the core principles of design, including place-making, environmental responsibility, social equity and economic viability, that are required when creating places of high quality and distinct identity. Box 2 identifies 12 ‘Best Practice Design Manual’ criteria which should be incorporated in new residential development as follows.

1. Context: How does the development respond to its surroundings?
2. Connections: How well is the new neighbourhood / site connected?
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?

A Design Statement responding to the 12 criteria above has been prepared and accompanies the documentation. The response to the criteria is summarised below.

Table 1: Summary of Design Statement response to specific criteria

No.	Topic	Response
1	Context	<p>The proposed new development serves to address the exiting poor boundary with new frontage to East Wall Road establishing a strong urban edge, animated by front doors and overlooked by balconies and apartments. A stepped increase in height is proposed from east to west along East Wall Road where 3/4storey buildings are proposed adjacent No. 24 East Wall Road, rising to 6 stories at the western boundary. Care has been taken to ensure that properties to the east of the site are not significantly overshadowed by the proposed development, and that their gardens are not directly overlooked by balconies or living spaces.</p> <p>The main building along the East Wall Road site frontage is sufficiently set back from the site’s southern boundary, so as not to affect the amenity of existing dwellings on Leinster Avenue further south. A 3 storey duplex terrace has been included within the courtyard which serves as a transition in scale between the taller main apartment building and existing 2-storey dwellings to the east and south.</p>

No.	Topic	Response
		<p>The design and finishes proposed are simple and contemporary. The street façade to East Wall Road is ordered and repetitive, with projecting bays on upper floors forming the frontage to both 2 bed and 3 bed apartments.</p> <p>The proposed development serves to make a positive contribution to the existing neighborhood. The completion of the development will establish a model for the development of the adjacent site to the west. The activation of this site will also ensure that existing dwellings on Hope Avenue and Leinster Avenue no longer back on to unused former industrial lands, providing greater security to the rear of their properties.</p>
2	Connections	<p>The site is a modest urban infill site, beside established communities. The Fire Station site immediately to the west, which may be developed in future. Otherwise, there are no opportunities for connectivity through the site owing to its size and configuration.</p> <p>The site is located in close proximity to existing urban centres at Fairview to the north, and to Dublin city centre further south. Linking both of those locations is North Strand Road, a primary arterial route into the city that is well served by public transport, and includes a bus stop approx. 100m west of the development site.</p>
3	Inclusivity	<p>The proposed development has been developed by Dublin City Council, based on their records of housing needs within the locality. 7 No. apartments are designed to Universal Design (UD) standards located at ground floor, in a mix of 1 bed and 3 bed sizes. The UD apartments have been designed to provide for a broad spectrum of particular needs. This includes increased space standards within living spaces, a potential connection between the main bedroom and primary bathroom, and larger room sizes throughout. At the street frontage, an access ramp and steps has been sensitively integrated into the architectural language of the building plinth, providing access to both the common cores and to ground floor UD apartments. The vehicular and pedestrian link from street to courtyard is also gently sloped, and there is no requirement for any other steps or ramps within the site.</p> <p>A mix of 1 bed, 2 bed and 3 bed apartments are provided which allows for a wide variety of apartment types throughout the development, which will suit a wide variety of household types.</p> <p>The public realm is welcoming, with open and inviting public space, but well defined and enclosed front curtilages and private rear gardens and terraces. The communal open space has been designed with facilities for a wide range of interests and abilities, to ensure that it is attractive to a broad spectrum of residents.</p>
4	Variety	<p>A good mix of apartment types are proposed within the development, ranging from 1bed to 3bed apartments, some of which are to UD standards. This will help to develop a mixed community, with the anticipation that larger apartments will be occupied by families.</p>

No.	Topic	Response
5	Efficiency	<p>There is frequent public transport along this route, with the nearest bus stop within 100m of the site frontage.</p> <p>SUDS principles have been applied to control rainwater run-off from the site. These range from engineered storm attenuation systems, swales within the courtyard, to the inclusion of sedum roofing that will also enhance biodiversity.</p> <p>Centralised air source heat pumps will deliver heat and hot water. There is potential for the plant to be decommissioned in future, to be replaced with a connection to the proposed Dublin district heating network, availing of waste energy from the Dublin Waste to Energy facility.</p> <p>Generous provision of infrastructure is provided for charging of battery electric vehicles, and all parking spaces will be ducted to allow for the easy addition of further charging infrastructure in the future.</p> <p>Apartments have been designed with modest plan depths, generous window sizes and dual aspect to the majority of units, to benefit daylight and reduce energy consumption from artificial lighting. A full daylight analysis has been completed for all apartments. In addition, daylight and sunlight to open space has been considered, and also with respect to potential overshadowing of adjacent dwellings.</p> <p>Bin storage and recycling facilities have been allowed for within the communal courtyard. These are located in areas where they are readily accessible for residents as they exit the building, whilst still ensuring that bin stores are adequately screened so as not to be a visual nuisance to adjacent apartments. Secure cycle storage is provided.</p>
6	Distinctiveness	<p>The proposed development aims to be much more engages with the street. The façade to East Wall Road is distinct to its location. A repetitive order of projecting bays helps to establish a rhythm to the façade, but these step in height from east to west to provide a reasonable transition from the adjacent 2-storey context.</p> <p>Deep recesses within the façade provide for a corner aspect to apartments along this façade, with balconies located within these recesses. The facade is further animated by large windows to living rooms, as distinct from smaller windows to bedrooms, with this order repeated across the façade. At ground floor level, main entrance cores are finished in contrasting materials, and denoted by a generous projecting canopy. A line of street trees for the width of the site frontage also provides welcome greenery to this part of East Wall Road.</p>
7	Layout	<p>Communal and private spaces are well defined, with clearly defined front curtilages to own-door ground floor apartments on East Wall Road. Within the courtyard, private rear curtilages feature additional planted screening, to ensure sufficient privacy to private open space, and to differentiate between public and private realm.</p>

No.	Topic	Response
		<p>As the building is an urban infill development, with no through routes, any new streets are limited to access roads to the communal courtyard car-parking. Shared surfaces are proposed throughout the courtyard, to assist with speed control, and horizontal deflection is also employed on the link road that runs the short length from the courtyard entrance to the car parking area. Cars are located at the southern end of the courtyard, with communal open space adjacent to duplexes and apartments.</p>
8	Public realm	<p>The main public space to this development is formed on the street side, with a layered development of tree planting, access ramps and steps, and private curtilages. The layered nature of this element of public realm, both in its depth from the street, and terraced nature from street level to entrance level ensures that there is a very clear definition of transition from public to private space. Ground floor curtilages are separate and distinct from the public realm, by means of a gate on the curtilage boundary. All public realm on the street side is well overlooked from both ground floor and upper levels. The inclusion of street trees and tree pits improves the public realm, and aids SUDs and biodiversity.</p> <p>Within the courtyard, the public realm is of a semi-public nature, and is likely to only be experienced by residents or visitors to the site. The communal open spaces within the courtyard provide for a mix of amenities, with a benched seated area, children’s play area, and some mown grass areas. A mix of trees and low-level planting are included, with dense planting for both visual interest and screening purposes.</p> <p>Swales have also been included within the landscaping, for biodiversity and SUDs gains. All amenities, including the children’s play area are centrally located, and well overlooked from apartments on all levels.</p>
9	Adaptability	<p>The building provides for a range of apartment types, ranging from 1 bed 2 person to 3 bed 5 person apartments. As the apartments are not for private sale, and are to be rented to residents of DCC’s housing list, this gives some flexibility should a resident have changing needs and wish to be relocated within the same community. 7 no. ground floor apartments to the main building have been designed to Universal Design Standards. This will allow for more flexibility for longer term changing needs of those residents in-situ.</p>
10	Privacy	<p>For the main apartment building, ground floor apartments feature a private terrace, which opens onto the communal courtyard. Upper-level apartments feature a generous balcony opening off the living space, which overlooks either East Wall Road or the south facing courtyard, depending on orientation. Balconies to East Wall Road are deeply recessed within the façade, to enable residents to use the balcony in relative privacy. Balconies facing the courtyard are not projecting, with a series of dividing panels between adjacent balconies. Balconies adjacent to the east and west boundaries feature extended gable wall ‘blinkers’, to restrict views towards adjacent properties. The proposed</p>

No.	Topic	Response
		<p>balustrade treatment for all balconies utilises a series of vertical fins that allow direct views out from the balcony and adjacent living space, but ensure that oblique views into the balcony are restricted, for improved privacy.</p> <p>Private amenity for the duplex ground floor apartments is provided by means of a large terrace opening off the kitchen/ dining space.. Upper floor duplex apartments feature a balcony that overlooks the courtyard.</p>
11	Parking	<p>There is parking for 34 no. cars, at a rate of 0.5 spaces per apartment, with 2 no. centrally located accessible spaces. Parking is well overlooked from all west and south facing apartments and duplexes, with natural passive surveillance of both car-parking and routes to car-parking. Screening, by means of trees and low shrub planting is included as a buffer between parking and communal open space.</p> <p>The communal courtyard will feature an enclosed cycle parking pavilion, with spaces at the rate of 1 per bedspace, plus visitor parking. Additional visitor cycle parking is included at the entrance to the courtyard.</p>
12	Design	<p>A Design Statement accompanies the documentation which sets out in detail the design rationale. In summary, the site abuts a stretch of the River Tolka that is designated as an Architectural Conservation Area within the DCC Development Plan. The proposed East Wall frontage will provide views over Fairview Park opposite. Generally, materials to both the public realm and buildings have been proposed to strike a reasonable balance between aesthetics, cost effectiveness and long-term maintenance with the north façade to East Wall Road featuring higher quality materials and detailed articulation and a simple and cost-effective articulation within the courtyard.</p> <p>The street façade to East Wall Road has a layered depth to its composition and features a series of repetitive forms. The dominant form is a series of projecting bays on upper floors, which forms the frontage to the majority of apartments on this facade. These projecting bays are proposed to be finished in a red-buff coloured clay brick with off-white mortar. The red toned brick gives a robust finish with an appropriate colour and lighter tones to provide some brightness to this predominantly north facing façade.</p> <p>The remainder of the street façade forms a backdrop to the projecting bays. This façade, primarily to lift and stair cores, is set back from the main frontage. To mark this contrast and provide sufficient intelligibility and articulation to the design, it is proposed that these elements will be finished in a dark brown multi clay brick with off-white mortar.</p> <p>At ground floor level, the walls immediately adjacent to the entrances to common cores are finished in a bold statement of colour, and features a generous canopy to help denote the importance of these entrances. These walls are to be rendered and finished with a high-quality mineral paint. Given the</p>

No.	Topic	Response
		<p>accessible location, this treatment gives a reasonably robust and durable finish, which can be re-touched in future if required.</p> <p>The majority of plant will be at roof level, and sufficient plant storage space and high parapet walls have been included to ensure that the visual impact of any plant will be minimised.</p>

Section 5 of the Apartment Guidelines 2020 sets out locations suitable for increased densities with 5.7 focussing on development on brownfield sites. It recognises that where sites are located close to existing or future transport corridors, the opportunity for their re-development to higher densities should be promoted.

The proposed density is 135 uph. To address a potentially significant difference in scale at the site boundary interface, a stepped increase in height is proposed from east to west along East Wall Road, rising to 6 stories at the western boundary. As a result of its urban location and strong transport links, Dublin City Council has set a brief density for the combined subject site and Fire Station site of 140-150 units per ha (uph). It is considered that approximately 172 uph is possible across both sites, with 135 uph achieved for the subject site.

The slightly lower density on this subject site is due to the pursuance of a stepped reduction in height adjacent to existing 2-storey dwellings, to benefit contextual integration, and also having regard to the amenity of adjacent residents.

4.2.4 *Design Manual for Urban Roads and Streets (2019) (DMURS)*

Section 1.2 sets out the national policy background that states street layouts should be interconnected to encourage walking and cycling and offer easy access to public transport.

Section 3.2 identifies types of streets. Arterial streets are major routes, link streets provide links to arterial streets or between neighbourhoods, while local streets provide access within communities and to arterial and link streets.

Section 4.4.3 states that radii on turns from a link street to a local street may be reduced to 4.5m. A maximum radius of 1-3m should be used on local streets.

Section 4.4.1 states that the standard carriageway width on local streets should be 5-5.5m, or 4.8m where a shared surface is proposed.

Compliance with the requirements of DMURS can be found in the report prepared by East Wall Traffic and Transport Assessment prepared by RPS. The internal road network within the development will have a carriageway width of 5.5m and a minimum 1.8m footpath width in accordance with the guidance set out in DMURS. Corner radii will not be greater than 6m and will allow for the swept path of a 7.90m refuse truck and 8.68m fire engine. A visibility splay of 45m is required based on a speed limit of 50km/h in accordance with DMURS. Visibility splays in excess of this are achieved from the proposed development access to the surrounding road network once site clearance has been completed.

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

These apartment guidelines supersede the City Development Plan. Duplex units are apartments and therefore these Guidelines also apply to them. The key relevant Specific Planning Policy Requirements (SPPRs) are summarised in Table 3. This table sets out how the development complies and applies to the entire development.

According to the principles of s.2.4 of these guidelines, the site would qualify as central and/or accessible urban locations.

Table 2: Specific Planning Policy Requirements Apartment Guidelines 2020

SPPR number	Summary	Development Compliance
SPPR 1	Mix Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) with no minimum requirement for apartments with three or more bedrooms.	Proposed mix is as follows: 17 no. 1-bed units: 25% 28 no. 2-bed units: 41.2% 23 no. 3-bed units: 33.8% No studio units are proposed
SPPR 3	Minimum Apartment Floor Areas <ul style="list-style-type: none"> - Studio apartment (1 person) - 37 sq.m - 1-bedroom apartment (2 persons) - 45 sq.m - 2-bedroom apartment (3 persons) 63 sq.m (subject to a max of 10% of overall units) - 2-bedroom apartment (4 persons) - 73 sq.m - 3-bedroom apartment (5 persons) - 90 sq.m 	Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) and twhich demonstrates compliance. The proposed development is: 17 no. 1 bed - 2 person 28 no. 2 bed - 4 person 23 no. 3 bed - 5 person Total No. 68 Each apartment exceeds the minimum standards in the Apartments Guidelines and the HQA sets out in table format the floor area of each apartment and the compliance with the Guidelines.
SPPR 4	Dual Aspect (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) and (iii) do not apply.	67.6% of units are dual aspect. All single aspect units are south west facing and overlook the communal open space.

SPPR number	Summary	Development Compliance
SPPR 5	Floor to ceiling heights 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.	The proposed floor to ceiling height of ground floor units is 2.7m in accordance with this specific policy.
SPPR 6	Apartments per core A maximum of 12 apartments per floor per core may be provided in apartment schemes.	The proposed development complies with SPPR6. Generally, 6 apartments per core are provided on the larger block.

Non-specific policy in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)

A number of non-specific standards are provided in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020) (Apartment Guidelines 2020) which are outlined below and compliance thereto.

Minimum Quantitative Standards

Appendix I of the Apartment Guidelines 2020 sets out minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. Please refer to the schedule of accommodation and the floor plans of each of floor which demonstrate the bedroom and other rooms sizes.

In relation to communal amenity space, the minimum requirement to be met is set out below:

Table 3: Minimum requirements for communal open space

Unit types	Sqm Required	No of Units	Total Required (Sqm)
1-bed	5	17	85
2-bed (3 persons)	6	0	0
2-bed (4 persons)	7	28	196
3-bed	9	23	207
Total			488

The total communal open space provision is 755 sqm. A diagram showing how areas are calculated is provided on the site density calculation drawing no. SHB3-EAW-AR-COA-DR-0006.

Size in excess of ten percent floor area

Section 3.8 (a) of the Apartment Guidelines 2020 provides that *'the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom units types by a minimum of 10%.....'*

The schedule of accommodation and HQA demonstrates compliance, that the majority of the proposed apartments (47 No. or 69 %) are in excess of ten percent larger than the minimum floor area.

Play areas

The Apartment Guidelines 2020 indicate minimum requirements for play areas of schemes of a certain sizes. The proposed scheme is in excess of 25 or more units with two or more bedrooms (51 no.) and therefore small play spaces (about 85 – 100 sqm) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building is generally required. As the scheme does not include 100 or more units with two or more bedrooms, a larger play area is not required. The proposed development includes a play area (86 sqm) as illustrated in drawing No. 0100-Landscape Masterplan prepared by Mitchell and Associates within the courtyard area. Seating is also proposed in the courtyard. Details of the specific play equipment will be agreed with Dublin City Council.

It may also be noted that Fairview Park which contains a large playground is opposite the subject site on the north side of the Tolka River.

Cycle Provision

The Apartment Guidelines 2020 provide the following:

Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.

70 resident spaces and 18 visitor spaces are proposed. While these number constitute a deviation from the Apartment Guidelines, they comply with the standards of the CDP. DCC Development Plan 2016 – 2022, Table 16.2 states that one cycle space per housing unit (housing and apartments) should be provided for residential developments in all zones. Additional requirements for larger units and visitor parking will be decided on a case by case basis. The proposed provision of 70 No. is in excess of this requirement and equates to a ratio of 1.03 per unit. The cycle parking provision in the Apartment Guidelines 2010 are not SPPRs where they are mandatory. Deviation from the standard is at the discretion of the Planning Authority. IN this case, the proposed cycle parking is in accordance with the CDP and the location is adjacent to high quality bus transport.

Most of the cycle parking is located in a pavilion type structure with visitor parking at the entrance. Cycle parking is illustrated on Drawing No. 100 Landscape Master Plan by Mitchells and Associates.

Car Parking

The Apartment Guidelines 2020 state that *‘the default policy is for car parking provision to be minimised substantially reduced or wholly eliminated in certain circumstances’*. This policy is applicable in *‘highly accessible area such as in or adjoining city cores or at the confluence of public transport systems such rail and bus stations located in close proximity’*. The site, being located in a central and/or accessible urban location, avails of lower parking standards.

The site proposed for development under this Part 8 application would qualify as one such central/and or accessible urban location, owing to its proximity approximately 100m from two bus stops on North Strand Road and directly opposite one bus stop on East Wall Road as shown in **Error! Reference source not found.** and **Error! Reference source not found.** in the Mobility Ma

nagement Plan. The bus stops on North Strand Road facilitate stops for 12 No. Dublin Bus routes to the wider Dublin and the bus stop on East Wall Road facilitates a stop for 1 No. Dublin Bus route to the ferry port. The site is also located approximately 1.5km from the Busáras Central Station which equates to a 15 minute walk or a 6-minute cycle. Additionally, the Airlink 757 and 747 Bus running to Dublin airport can be accessed from Busáras Central Station.

In addition, the subject site is located 1.3km away from Connolly Station (LUAS, DART and Irish Rail). DART services can also be accessed via Clontarf Road DART Station from the proposed development site at 1.2km distance. This train service links the proposed development site to the northern and southern parts of the Greater Dublin Area.

It is therefore considered that a lower parking ratio may be applied. The proposed development includes 34 spaces for 68 units equating to a parking ratio of 0.50 per apartment.

The documentation pack includes a Traffic and Transport Assessment Report and a Mobility Management Plan both prepared by RPS. The Mobility Management Plan outlines measures to enable a reduction in car parking provision and addresses public transport information, car-sharing, walking/cycling, parking management and road safety.

Content of Planning Applications

The Apartment Guidelines 2020 require that certain documents be prepared:

1. A Housing Quality Assessment (HQA) accompanies this part 8 application. It includes:
 - Compliance with the 10% additional floor area
 - Details of proposed private amenity space, storage space and aspect.
2. A daylight and sunlight analysis report by H3D is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of the *British Standard: Lighting for Buildings – Part 2: Code for Practice for Daylighting*, BRE 209, and ‘*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*’, Second Edition 2011, by P. J. Littlefair. The report concludes that a comprehensive daylight and sunlight assessment of the proposed development using simulation modelling and comparing results achieved that the proposed development would not cause an unacceptable overshadowing impact on the neighbouring windows or amenity spaces. An analysis also confirmed that the internal communal space would exceed the required overshadowing requirement thus providing good sunlight amenity. From the Average Daylight Factor (ADF) analysis, all spaces passed the BRE guideline levels. The opinion in the conclusion of the report is that the proposed apartments are considered to provide an excellent standard of amenity from a daylight perspective.
3. A building lifecycle report accompanies this application. The building lifecycle report addresses management and energy efficiency.

4.2.6 Urban Development and Building Heights- Guidelines for Planning Authorities (2018)

The Urban Development and Building Height Guidelines for Planning Authorities 2018 (Building Height Guidelines 2018) were published to support the achievement of some of the policies and objectives of the NPF 2040, to secure compact and sustainable urban growth, particularly on brownfield and infill sites and that optimal capacity of sites should be sought. This may involve increased height where it can be demonstrated that it complies with certain parameters.

Section 2.11 recognises that policy direction relating to height is a matter for the development plan which identifies suitable areas for increased height.

The Dublin City Development Plan 2016-2021 applies to the subject site. The proposed development provides for a range of height ranging from 3 to 6 storey within the permissible envelopes of the Dublin City Development Plan. It includes a mix of apartments and duplex units.

Section 3 of the Guidelines regards development management. It includes criteria against which developments should be assessed where development proposed is taller than prevailing building heights. As the site is surrounded on two sides by low rising residential units, those criteria are considered below.

First the guidelines pose three broad questions:

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

The response to this question is that the proposed development is located on a brownfield site which has long lain vacant. It is also a registered vacant site. The proposal to develop residential units on the former concrete batching site therefore positively assists in fulfilling targets as set by the NPF.

‘Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?’

The response to this question is that proposed development aligns with the provisions of the Dublin City Development 2016-2022 in respect to building height.

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

The response to this question is that the while the Development Plan adopted in 2016 predates the Building Height Guidelines 2018, the proposed development aligns with the both the building height policy in the Dublin City Development Plan and the NPF.

The Building Height Guidelines 2018 provide criteria by which a development may be assessed in section 3.2. This section divides the assessment into three broad areas from the higher-level scale of the city, to the scale of neighbourhood/district and finally to the scale of the site. Within each assessment, the guidelines require certain criteria to be addressed. The criteria also includes specific assessments in certain instances. The following table sets out the criteria and the response to each.

Table 4: Urban Development and Building Height Guidelines for Planning Authorities 2018 criteria and response

At the scale of the relevant city

Criteria in the Building Height Guidelines 2018	Development Response
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is located 170m east of the North Strand fire station bus stop no. 616. This bus stop is served by buses 6, 14, 15 ,27, 27A, 27B, 42, 43, 53, 130, H1, H2, H3 and H9, the last three being

Criteria in the Building Height Guidelines 2018	Development Response
	Bus Connect lines. The North Strand is a Quality Bus Corridor. Another bus stop is located directly across the site linking Talbot Street to Dublin Port. The site is also c 1.3 km from Connolly Station and 1.2 from Clontarf Dart Station.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	The proposed development incorporates a range of heights, which steps away from existing residential units. It is of modest scale, well within permissible heights envisaged by the Dublin City Development Plan and would not warrant a landscape and visual assessment.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	The site is 0.55 ha and of relatively small scale. This criterion does not apply as it is an infill site.

At the scale of the district / neighbourhood

Criteria	Development Response
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposed development includes an element of public realm to its frontage, which directly faces the Tolka. The current interface between the Tolka and the site is in poor condition with overgrown vegetation, graffiti and a damaged footpath. The new interface will see a high quality building design and tree planting. The Design Statement that accompanies the Part 8 documentation sets out the design rationale and design concept of the new urban edge along East Wall Road. The site will introduce 68 new homes onto a former vacant site.

Criteria	Development Response
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	The development is not monolithic and includes heights ranging 3 to 6 storeys. The Design Statement sets out in detail the materials incorporated into the design and these are summarised above in Table 1 (subsection 12 Design) as well as the design rationale.
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)	The current interface between the Tolka and the site is in poor condition with overgrown vegetation, graffiti and damaged footpath. The new interface will see a high quality building, improved public realm and tree planting. The new building will overlook the street, the river and the public park opposite. In addition, on foot of a Stage 2 Flood Risk Assessment (FRA), Finished Floor Levels (FFLs) have been set higher than the street level. See section 7 below.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The vacant site is unkept and makes no aesthetic contribution to the area. It is the subject of anti-social behavior. The proposal will positively contribute to the area owing to high quality public realm and tree planting.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The proposed development makes a positive contribution to the housing stock owing to a mix which includes smaller units (1 and 2 beds).

At the scale of the site / building

Criteria	Development Response
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.	The Design Statement sets out in detail the design rationale of the scheme. In summary, apartments have been designed with modest plan depths, generous window sizes and dual aspect to the majority of units, to benefit daylight and reduce energy consumption from artificial lighting. A full daylight analysis has been completed for all apartments. In addition, daylight and sunlight to open space has been considered, and also with respect to overshadowing of adjacent dwellings. Adjacent to the eastern site boundary, care has been

Criteria	Development Response
	<p>taken to minimise roof verge heights, to ensure that neighbouring properties to the east of the development are not adversely overshadowed. The street façade to East Wall Road is ordered and repetitive, with projecting bays on upper floors forming the frontage to both 2 bed and 3 bed apartments. The main building is stepped from 6 storeys at the west down to 3/ 4 storeys at the east.</p>
<p>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</p>	<p>A daylight and sunlight analysis report is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of the <i>British Standard: Lighting for Buildings – Part 2: Code for Practice for Daylighting</i>, BRE 209, and ‘<i>Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice</i>’, Second Edition 2011, by P. J. Littlefair. A summary of the conclusion is provided in section 4.2.5 above which concludes that that the proposed apartments are considered to provide an excellent standard of amenity from a daylight perspective.</p>
<p>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.</p>	<p>The proposal meets all the requirements. No compensatory measures are required.</p>

Specific Assessments

Criteria	Development Response
<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such</p>	<p>Micor climate effects relate to tall buildings where wind can be accelerated either through</p>

Criteria	Development Response
<p>assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</p>	<p>narrow channels between these structures or, from being accelerated downward towards the ground through downdraft effect. As this development is 3 to 6 storeys on an infill site, it is considered that development is not of such scale that a microclimatic assessment is required.</p>
<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.</p>	<p>An ecological impact assessment was undertaken. It considers that all habitats are of negligible ecological importance. No protected plants or problematic invasive species (e.g. Japanese knotweed) were recorded.</p> <p>The site may be used by common bird species, but it is highly unlikely to be used by any rare species. Impacts on nesting birds will be avoided by scheduling site clearance and demolition works for the non-breeding season (October – February), or by commissioning a pre-construction survey by a suitably-qualified ecologist. The Site also appears to have some importance for foraging and commuting bats. In response, bat sensitive lighting is proposed in external areas. Some potential ecological enhancements are proposed, including the planting of native trees and shrubs (to benefit pollinators and birds) and the provision of bird boxes. If the ecological enhancement measures can be implemented, it may be possible to have a positive effect on local biodiversity.</p>
<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</p>	<p>The development is not of such scale that this assessment is required.</p>
<p>An assessment that the proposal maintains safe air navigation</p>	<p>The development is not of such scale that this assessment is required.</p>
<p>An urban design statement including, as appropriate, impact on the historic built environment</p>	<p>There is no impact on the historic built environment.</p>
<p>Relevant environmental assessment requirements, including SEA, EIA, AA</p>	<p>EIA, AA And EclA have been carried out and accompany the par 8 suite of documents. These</p>

Criteria	Development Response
and Ecological Impact Assessment, as appropriate.	are summarised at the final sections of this report. SEA does not apply.

4.3 Eastern and Midland Regional Assembly (EMRA) –Regional Spatial & Economic Strategy (RSES) (2019-2031)

The Regional Economic and Spatial Strategy (RSES) considers that Dublin City and suburbs will be home to 1.4 million people and supports the consolidation and re-intensification of infill, brownfield sites, to provide high density and people intensive uses within the existing built up areas, and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects. East Wall is located in the Strategic Development Areas referred to as the City Centre within the M50.

The Growth Strategy for the EMRA seeks to deliver sustainable growth of the Dublin Metropolitan Area through the Dublin Metropolitan Area Strategic Plan. It promotes compact growth to realise a target of at least 50% of all new homes to be built, to be within the existing built-up area of Dublin City and suburbs. In Dublin City and suburbs the focus lies on the redevelopment of infill and brownfield sites (RPO 3.3 and RPO 4.3) and considers that development should align with the prevailing national guidelines.

Chapter 9 of the RSES particularly focuses on quality of life in the form of consideration of age, diversity, housing and community. The RSES are supportive of greater diversity in housing tenure and type (RPO 9.3). It recognises the importance of social and community infrastructure (RPO 9.14) and for it to be tailored to the needs of those it serves.

The proposed development will be located on a brownfield site. It will therefore contribute with the target as set out in the RSES.

5 Local Planning Policy

5.1 Dublin City Development Plan 2016-2022 (CDP)

5.1.1 Zoning

The subject lands are zoned Z4 'To provide for and improve mixed-services facilities'.

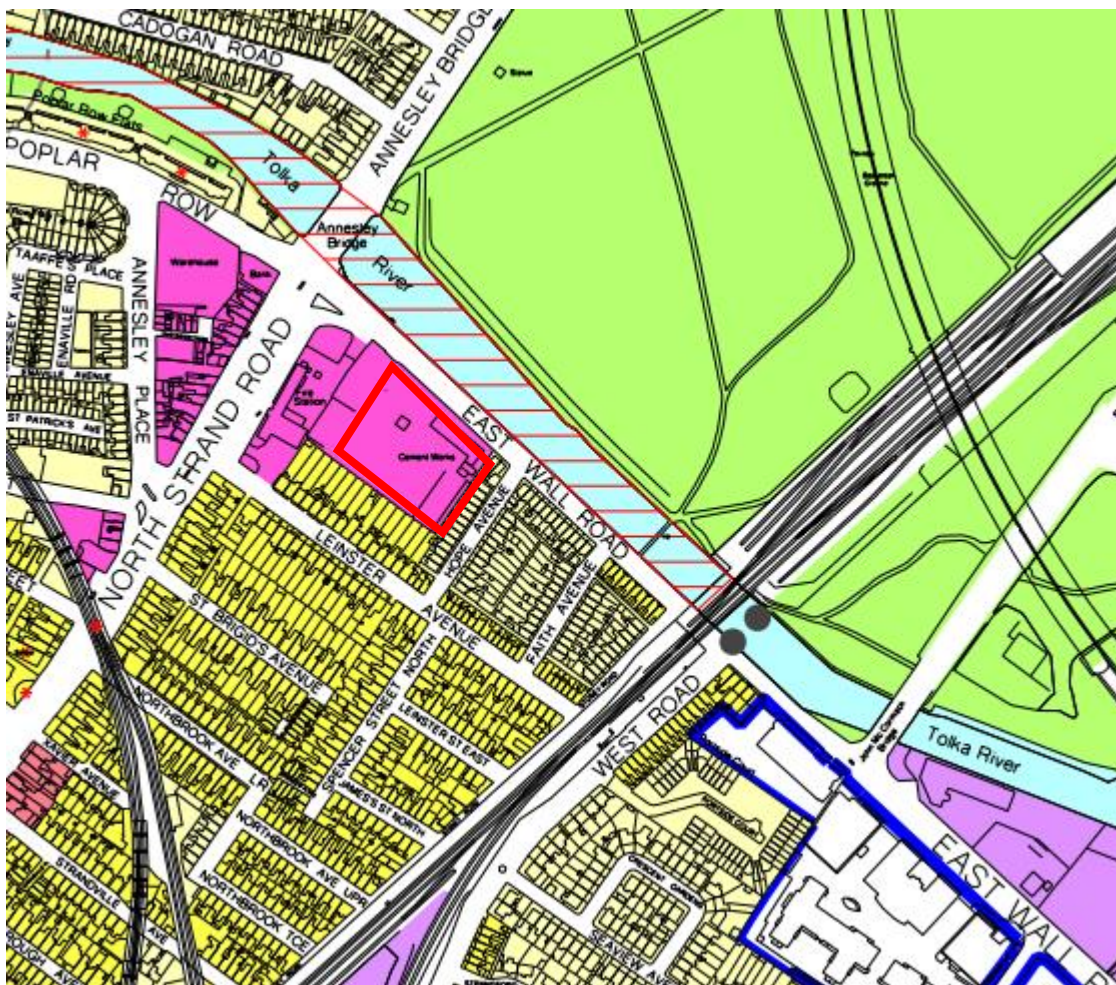
Residential is a normally permissible use in this zoning. The plan states: *“Opportunity should be taken to use the levels above ground level for additional commercial/retail/services or residential use with appropriate social facilities. Higher densities will be permitted in district centres, particularly where they are well served by public transport.”*

The proposed development is 134 .3 units per ha.

The Tolka River is a Conservation Area which is parallel to the subject site and East Wall Road.

The proposed development is set back from the East Wall Road boundary and is separated from the Conservation area by the footpath and carriageway. The proposed development will overlook the Tolka River and Fairview Part to the northwest.

Figure 8: Zoning Map (site outlined in red)



5.1.2 Location and SDRA 6

According to Map K of the CDP, the site is located in the Inner City and forms part of the Strategic Development and Regeneration Area (SDRA) 6 – Docklands – including SDZ area and Poolbeg West. The SDRA considers a number of principles focussed on social sustainability. In particular, it seeks:

‘to ensure a holistic approach to housing that will achieve successful integration of residents, neighbours and the wider community;

To promote the expansion of the Docklands’ residential population, cater for life-cycle requirements of the existing population and provide for recreational facilities for children across a range of ages.

The Plan also states *‘To safeguard residential amenity and to ensure appropriate transition in scale, the design of new development shall have regard to the context, setting and amenity of existing housing the SDZ and wider Docklands area.’*

It also contains a land use and urban design tenet whereby it seeks,

‘to continue to secure the distribution of residential use throughout the Docklands area by requiring an appropriate residential / commercial land-use mix on key development sites.

The Plan states *‘To ensure that the public realm in the Docklands area operates as a connected network of social spaces and creates a unique sense of place.’*

The proposed development is aligned with the principles arising from SDRA 6 in the following:

- Provides a mix of one, two and three bedroom homes adjacent to existing residential homes and close to the city centre and all amenities.
- Provides apartments designed for universal access.
- Provides communal open space, parking, cycle parking and play area.
- It expands the existing population.
- The development is stepped in height in recognition of the two storey residential adjacent.
- Provides quality open space and landscaping and new tree planting (see Landscape Masterplan Drawing 100 by Mitchel and Associates).

5.1.3 Other Relevant Policies and Objectives

Sustainable Communities and Neighbourhoods

Number of policies are relevant to the proposed development, particularly SN5 which required the preparation of social infrastructure audit for development over 50 units.

A social infrastructure audit accompanies the part 8 documentation. It concludes that owing to the scale of the development, its location in proximity to the city centre and the existing provision of community infrastructure in the area, the development would not give rise to pressure on existing facilities or would justify the need to provide new ones.

Built Heritage and Culture

Chapter 11 of the CDP regards Built Heritage and Culture. The River Tolka opposite the subject site is Conservation Area but does not form part of the site. Policy CHC4 of the CDP applies, whereby it seeks to protect the special character of all Conservation Areas and notes that developments within or affecting those *‘should contribute positively to its character and*

distinctiveness and take opportunities to protect and enhance the appearance of the area and its setting whenever possible.'

The policy seeks particularly to (inter alia):

- Replace or improve building, feature or element which detracts from the character of the area or its setting;
- Improvement of open spaces and the wider public realm and characteristic plot pattern
- Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area .

The proposed development includes an element of improved public realm to its frontage, which directly faces the Tolka. The current interface between the Tolka and the site is poor with overgrown vegetation, graffiti and damaged footpath (as seen in figure 9 below). The new interface will see a high-quality building design and tree planting as seen in figure 10 below.

Figure 9: Site Frontage onto the Tolka River – Existing



Figure 10: Site Frontage onto the Tolka River – Proposed



Source: SHB3-EAW-AR-COA-DR-0050 Proposed Elevations

5.1.4 Development Management Standards

The development management standards are contained in the Chapter 16 of the Dublin City Development Plan 2016-2022.

The table below presents how the development responds to the standards applicable to residential developments on brownfield sites.

Design Standards

Table 5: Design Standards

Standard	Description	Development Response
Sustainable Open Space	Provide for accessible open space and landscaping which enhances ecological value and increases biodiversity.	The communal open space to the rear of the main block is publicly accessible from all prospective residents and from East Wall Road. The Open Space includes swales and is demonstrated in the Landscape Master Plan Drawing No. 100. Tree planting, general planting and wildflower planting is proposed and the details are provided in the planting details on said drawing.
Sustainable Urban Drainage	The following should be considered: <ul style="list-style-type: none"> - Green roofs - Attenuation ponds, swales, wetlands and detention basins (in larger schemes) - Permeable paving - Infiltration planters -Water butts 	SUDS principles have been applied to control rainwater run-off from the site. These range from engineered storm attenuation systems, swales within the courtyard, to the inclusion of sedum roofing that will also enhance biodiversity. Permeable paving is proposed.
Energy Efficiency	Passive solar design	Apartments have been designed with modest plan depths, generous window sizes and dual aspect to the majority of units, to benefit daylight and reduce energy consumption from artificial lighting. A full daylight analysis has been completed for all apartments and is included with this submission. Please also refer to Part L [title of report here].
Inclusive Design	Consider the needs of vulnerable groups such as older persons and disabled. This includes consideration of such provision of level circulation, lifts, door width and detail, surface finishes, signs and information.	The apartment block includes two lifts to allow access to upper floors. In addition, 7 number ground floor units have been designed to universal design standards.
	Needs of the occupants of different ages and stage of life shall be considered, ensuring scale, form, construction and internal arrangement of the building will enable future adaptability.	The development provides for one bed, two bed and three bedroom apartments allowing a mix of age groups within the scheme.

Boundary Walls and Railings

Table 6: Boundary Wall and Railings

Standard	Description	Development Response
New boundary walls	New boundary walls or railings should replicate an existing or traditional patterns which is characteristic to the immediate locality.	A boundary treatment plan accompanies this submission and is illustrated on Drawing No SHB3-EAW-AR-COA-DR-0008. Brick to be dark brown multi, with white mortar with galvanised steel over to compliment building.
	Use a design and materials appropriate to the existing or proposed building and street scene.	

Landscaping

Table 7: Landscape Standards

Standard	Description	Development Response
Hard landscaping	Materials: materials must be appropriate, durable and of good quality. Careful consideration must be given to the design of hard-surfaced areas. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	Please refer to the Architect Design Statement which details the materials palate. These are also summarised in Table 1 above subsection 12 Design.
Boundaries & streets furniture	Wall, fences, metal railings and gates used to define spaces and their usage all impact on the visual character of the development. These should be selected so as to be an integrated part of overall design. Street furniture should be sited such that they do not provide an obstacle for people with disabilities.	Units at ground floor level fronting East Wall Road are proposed to be situated at higher level than the road level to accommodate higher FFLs. Naturally as the access point to blocks is higher, a ramp will be located immediately to their front. This provides them with greater privacy from the road while ensuring a better definition between public and private realm. The open space at the rear was designed to be visually unobstructed with parking spaces and bin and cycle storage located towards the exterior of the public open space and the boundaries
Soft landscaping including trees	Existing trees and vegetation should be retained where possible.	No existing trees and vegetation is proposed to be retained as none is of good quality. The retention of existing vegetation would not allow for the creation of a high quality frontage to East Wall Road. Notwithstanding this, new vegetation is proposed, with tree planting on the East Wall frontage and soft landscaping in the courtyard.
	For larger sites, including institutional lands, proposals must take cognisance of the existing landscape character and quality	n/a to this site

Standard	Description	Development Response
	Where a large site adjoins a green corridor, public open space or area of high ecological value, any new public open space on the site should be contiguous to same and expansion of biodiversity; this can assist in expanding the green infrastructure network.	n/a to this site
	Landscape works should be integrated with sustainable drainage system.	SUDS proposals form part of the landscape plan. Please refer to the landscape plans.
	Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety.	Please refer to the Landscape masterplan Drawing No. 100 prepared by Mitchell and Associates which includes a detailed tree, swale, general and wild flower planting plan.

Trees

Table 8: Trees Standards

Standard	Description	Development Response
Existing Trees	Tree surveys must be submitted where there are trees within a proposed application site, or lands adjacent to an application site that could influence or be affected by the development.	A tree survey is submitted as part of this documentation prepared by Cunnane Stratton Reynolds (CSR). Nine trees of moderate value are to be removed from the site. New trees will be planted provided in lieu.
New trees	DCC encourages and promote tree planting in development proposals.	New tree planting is proposed along East Wall Road and as part of the courtyard.

Public Open Space

Table 9: Open Space Standards

Standard	Description	Development Response
All developments	There is a requirement of 10% specifically for all residential schemes.	<p>The proposed development is located directly south of the Tolka River which bounds Fairview Park to the south. A specific allocation is made for open space at 755 sqm open space (ie 12.5 % of net site). It is judged that this communal open space which is not closed to the public exceeds the 10 % requirement.</p> <p>Fairview Park is also located just north of the site. It is 20 ha and include GAA and soccer pitches, a large playground and a skatepark. The park is operated by Dublin City Council and opened 7 days a week. In addition, some 1.3 km north east is located Alfie Byrne Park which also includes soccer pitches and</p>

Standard	Description	Development Response
		a motocross track. The park is also opened 7 days a week and operated by DCC. Both parks are within reach on foot or by bikes of the prospective residents.
Indoor recreational facilities	Where there is evidence that sufficient public open space already exists in the locality, consideration will be given to the provision of indoor recreational facilities with public access for residents and workers in the vicinity.	A social infrastructure audit accompanies the documentation. It did not identify any requirements to be accommodated on-site and any need that may arise should be absorbed by existing facilities in the vicinity.

Density Standards

The CDP notes that the density standards are guided by the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). Compliance with these guidelines are set above in section 4.2.3. Where higher densities are proposed, proposals must demonstrate how it contributes to place-making.

The proposed density is 135 uph. The part 8 site is located in proximity to a high frequency bus corridor and within 1.5 km of the city centre, which support the argument to achieve higher densities. Additionally, the proposed East Wall urban edge provides overlooking of the street, the river and the public park all elements of place making and a courtyard with play area overlooked by the new development. A Daylight Analysis and Overshadowing Report is summarised above in section 4.2.5.

The architectural response is mindful of the context of the site, specifically of the low rise neighbouring structures located to the south and east of the site. Height is staggered to avoid undue overshadowing or overlooking onto these. On the East Wall frontage, the eastern section, the block rises from three storey to avoid impacts on 24 East Wall Road.

Plot Ratio

This section of the CDP indicates that plot ratios are not fixed but are indicative.

Plot ratio applicable to Z4: 2.0

Higher plot ratio may be permitted in certain circumstances:

- Adjoining major transport corridors, where an appropriate mix of residential and commercial uses is proposed.
- To facilitate comprehensive re-development in areas in need of urban renewal.
- To maintain existing streetscape profile.
- To facilitate the strategic role of institutions such as hospitals.

The proposed plot ratio is 1.54. The proposed plot ratio is slightly below the CDP recommendation as to respect the residential amenities of existing neighbouring residential units of Hope Avenue and Leinster Avenue. The back gardens of those units are shallow close to the boundary wall.

Site Coverage

This section of the CDP indicates that site coverage is not fixed but is indicative.

Site Coverage applicable to Z4: 80%

Higher site coverage may be permitted in certain circumstances:

- Adjoining major transport corridors, where an appropriate mix of residential and commercial uses is proposed.
- To facilitate comprehensive re-development in areas in need of urban renewal.
- To maintain existing streetscape profile.
- To facilitate the strategic role of institutions such as hospitals.

The proposed site coverage is 32.2% (excluding bins and cycle parking). Similarly to plot ratio, the proposed site coverage is lower than the CDP recommendation as to respect the residential amenities of existing neighbouring residential units of Hope Avenue and Leinster Avenue. The back gardens of those units are shallow close to the boundary wall.

Building Heights

Section 16.7.2 of the CDP sets out areas suitable for higher buildings. The subject site at East Wall is located in the Inner City where a height of 24m for residential development applies (table 16.2). Plant, flues and lift overruns are not included in the height of the building as long as they are set back and screened properly and do not overshadow or contribute to loss of natural light beyond that of the main structure. It also sets out the criteria for assessment of higher buildings.

The building fronting East Wall has a proposed parapet level at 26.25m AOD or 23m above ground level and is within the permissible heights considered under section 16.7.2. Above parapet, lift overrun reaches a height of 26.85m AOD or 23.85m high. The lift overrun is setback and does not overshadow or contribute to loss of light. At its highest point, to the west, the building is proposed to be 6 storey high, whereas it will be 3 storey high to the east.

The proposed duplex block to the rear is proposed to be 14.76 m AOD or 10.6 m or a height of three storey. This aligns with the low-rise nature of residential units located to the south to the site.

Proposed height on the site is progressive toward the main artery, the North Strand, as to not impact of the amenities of existing units to the east.

Standards for Residential Accommodation

The proposed development includes duplex units and apartments. Applicable standards are those included in the Apartment Design Guidelines discussed in other sections of this report.

Car and Cycle Parking

Car and cycle standards are contained in tables 16.1 and 16.2 of the Dublin City Development Plan (CDP).

Section 16.38.1 states that the parking standards set out in Table 16.1 and 16.2 will also apply to the Docklands SDRA and that the future development of the area needs to be weighted heavily in favour of the sufficient use and patronage of public transport, with a consequent reduction in the car parking requirements for significant commercial development proposals. In relation to residential development, section 16.38. 1 of CDP considers that residential car parking needs to address the requirement for car storage while not promoting car usage. The site is located within this SDRA .

The site falls within an area located in Car Parking Zone 3 but in close proximity (c 100 m to Bridget's Road to the south) to Car Parking Zone 2, where lower parking standards apply. It is noted that the standards indicated in the CDP are maximum standards.

Table 16.1 of the CDP provides that in Car Parking Zone 3, 1.5 maximum spaces per dwellings may be provided. Zones 1 and 2 provide for a maximum of 1 space per dwelling. The proposed development provides for 34 spaces.

The Mobility Management Plan (MMP) considers that the proposed parking ratio 0.5 is higher than the existing vehicle ratio per vehicle in the surrounding small areas of population which currently stands at 0.48 (source CSO). The MMP describes how parking at the proposed development will be managed. Further detail on the MMP is provided in Section 6 below. Given the location within the Docklands SDRA, the proximity to Area 1, the location adjacent to a high-quality bus corridor, a relaxation in the quantum of parking should be considered positively in this location.

The CDP also requires that 1 cycle space per unit be provided. 87 spaces in total are provided, 70 for occupants and 17 for visitors. The car and cycle parking are illustrated on the Landscape Masterplan Drawing No. 100. Further detail on cycle parking is provided above in section 4.2.5 in relation to cycle parking and the Apartment Guidelines 2020.

6 Transportation and Traffic

The following reports have been prepared and accompany the documentation:

Traffic and Transportation Impact Assessment

This report by RPS identifies existing conditions including site, surrounding road network, footpath and public transport. A traffic analysis of the existing and proposed development was carried out. Road layout, parking and visibility are analysed. The traffic impacts as a result of the proposed development are summarised as follows:

“The traffic impact at all junctions is below the thresholds where a TTA would normally be required. The majority of the impact as a result of the proposed development in terms of volume is less than 5% of the individual turning movements at each junction.

The proposed development is considered to have a low traffic impact based on its proximity to access public transport and sustainable modes of transport to local amenities and Dublin City Centre

A Mobility Management Plan has been drafted for the proposed development that will be implemented and monitored by an appointed mobility manager who will liaise with Dublin City Council Transportation Department, the National Transport Authority and the residents of the proposed development. The Mobility Management Plan should be reviewed annually to gauge the success of the plan in meeting the modal split targets. Where necessary, new / amended measures should be proposed and implemented.

In conclusion and following this assessment, the construction of this proposed development will not have a negative impact on the surrounding road network.”

Mobility Management Plan

The Mobility Management Plan (MMP) by RPS sets out as an objective to provide a co-ordinated approach to managing travel demand for the proposed social housing development as well as identifying and actively promoting sustainable travel for future residents. This MMP gathered information on existing travel patterns in the surrounding areas in order to set achievable and sustainable travel targets for the development. These targets take account of existing and future transportation infrastructure around the proposed site. The recommended measures (in the form of an action plan) will promote the attractiveness of walking, cycling, public transport, and other travel alternatives while reducing dependence on the private car, especially single occupancy journeys. MMPs have the overall aim of reducing CO2 emissions, traffic congestion and noise pollution while increasing air quality, physical activity and overall wellbeing. A preliminary Action Plan is stated to meet the objective.

The MMP also provides a rationale for the 0.5 parking ratio proposed for the development.

Road Safety Audit Stage 1 and Stage 2 Report

A Road Safety Audit took place during July 2021 and comprised an examination of the documents provided by the designers. The Road Safety Audit Stage 1 and Stage 2 Report examined the scheme and this report is submitted as part of this part 8 documentation. Seven general items were identified as road safety issues and recommendations for each were provided. The general problems identified have been noted in this report together with associated safety improvement suggestions, which the road safety audit team recommends should be studied for implementation.

7 Drainage and Water Supply

A number of policies and objectives of the Dublin City CDP apply in relation to the provision of drainage and water supply services in residential development under chapter 9 on Sustainable Environmental Infrastructure.

Drainage systems

SIO3: To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems

Surface water and foul water discharge will be to the public sewer network as agreed by Irish Water in its Confirmation of Feasibility Statement.

SuDs measures are included, see section 8.4 below. Sustainable Drainage Systems (SuDS) were considered for the site, in line with recommendations of Greater Dublin Strategic Drainage Strategy (GSDSDS) and include a green roof and permeable paving. The Drainage and Watermain Design Report by RPS sets out rationale and calculations for same. A Confirmation of Feasibility was secured from Irish Water is included.

Flood risk

S18: To mitigate the effects of floods and droughts subject to environmental assessments

SIO8: All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA)

See section 8.4 below for compliance and discussion in relation to flood risk.

8 Environmental Considerations

8.1 Appropriate Assessment

The Screening for Appropriate Assessment Report by NM Ecology, which accompanies the application documentation concludes:

“Having considered the particulars of the proposed development, we conclude that this application meets the first conclusion, because there is no risk of direct, indirect or in-combination effects on any Natura 2000 sites. Therefore, with regard to Article 42 (7) of the European Communities (Birds and Natural Habitats) Regulations 2011, it can be excluded on the basis of objective scientific information following screening, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site. Therefore, we conclude that Appropriate Assessment is not required.”

8.2 Ecological Impact Assessment

The Ecological Impact Assessment Report by NM Ecology, which accompanies this application, provides an assessment of the likely impacts. The Site is not within or adjacent to any designated sites. Potential indirect impacts on designated sites were considered within a 5 km radius, but no potential pathways for indirect impacts were identified.

The main habitat within the Site is buildings and artificial surfaces, with some scrub and treelines around the edges of the site. All habitats are of Negligible ecological importance and there are no protected plant or problematic invasive species.

Impacts on nesting birds will be avoided by scheduling site clearance and demolition works for the non-breeding season (October – February), or by commissioning a pre-construction survey by a suitably-qualified ecologist. The Site also appears to have some importance for foraging and commuting bats. In response, bat sensitive lighting is proposed in external areas.

Some potential ecological enhancements are proposed, including the planting of native trees and shrubs (to benefit pollinators and birds) and the provision of bird boxes.

8.3 Environmental Impact Assessment Screening

The Environmental Impact Assessment Screening Report, prepared by MacCabe Durney Barnes, concludes:

“Having regard to the nature and scale of the proposed development which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- *The scale, nature and location of the proposed impacts*
- *The potential impacts and proposed mitigation measures*
- *The results of the any other relevant assessments of the effects on the environment*

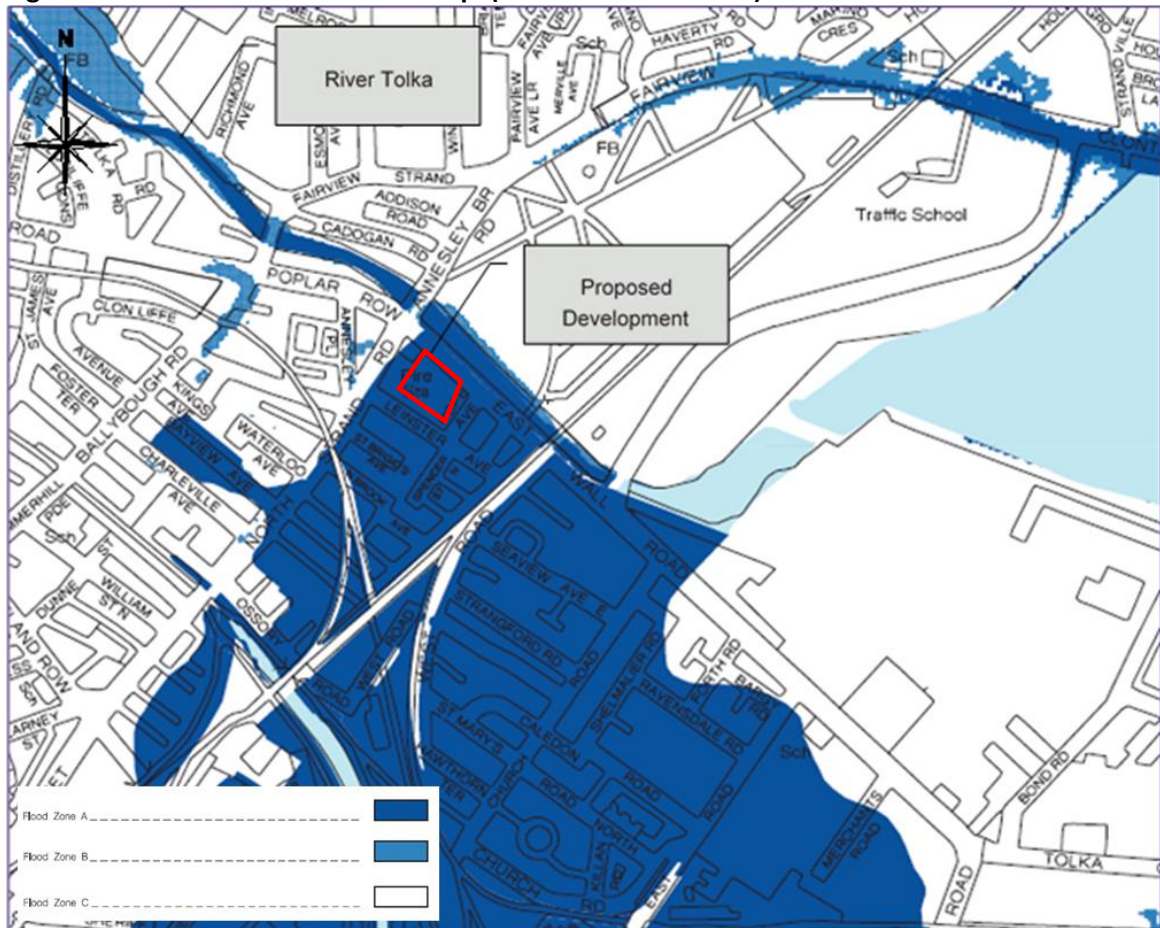
It is considered that the proposed development would not be likely to have significant effects on the environment and it is recommended that environmental impact assessment report is not required."

8.4 Flood Risk Assessment

The Hydrogeological and Flood Risk Assessment Report by RPS Engineers, which accompanies the application documentation, provides a Stage SFRA. There are no records of significant flooding of the proposed site. However, the proposed development is in Flood Zone A where the risk of fluvial flooding is highest. The risk of groundwater flooding is low. The proposed development site is located within the 0.5% AEP coastal flood extent (1 in 200 chance in any given year) i.e., Flood Zone A - Highest risk of flooding. The pluvial flood risk is deemed moderate.

Inclusive of a freeboard allowance of 0.5m, the proposed FFL level of the buildings should be set a minimum level of 4.15mOD. The top of wall level along the right bank of the River Tolka downstream of Annesley Bridge varies between 5.28 mOD and 4.39 mOD. This indicates that the proposed site is protected from the risk of future coastal flooding (Medium Range Future Scenario)

Figure 11: Flood Risk Assessment Map (Combined Flood Risk)



Source: SFRA Dublin City Development Plan 2016-2022

9 Other Considerations

9.1 Waste Management

SIO16: To require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate.

In accordance with SIO16, the proposed development includes the provision of adequately sized recycling facilities. Bin stores are accommodated close to both the cycle storage area and the car park. This provides for ease of access by residents as they leave the building, for disposal of waste and recycling. Bin stores are screened and otherwise open to the air, with planting buffers to shield the bin stores from adjacent open space and apartment amenity space.

SIO17: To promote the re-use of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000 sq.m, a materials source and management plan showing type of materials/proportion of re-use/recycled materials to be used shall be implemented by the developer

Although the content of SIO17 is noted, whereby developments over ten units should promote the reuse of building materials, asbestos was found in the different structures proposed for demolition. It is therefore not appropriate to reuse materials arising from demolition activities. Structures containing asbestos will be removed by a licenced contractor and taken to specialised licenced facilities for treatment.

A Contaminated Land Report (CLR) accompanies the Part 8 documentation. No asbestos was detected in any of the samples which underlie the proposed residential area and one sample was found in the in the proposed car park area and one in the open space area. Asbestos is commonly located within the top 0.30m of soil, therefore, this source of potential contamination is removed through soil excavation. It is recommended in the CLR that specialised personnel are contracted to sample the regions where the presence of asbestos is likely. Furthermore, it is recommended that samples are analysed by a specialist laboratory (i.e. IOM) to delineate and verify soil samples which may result in the reduction of asbestos concentrations unless there is a defined source. In addition, further sampling of the concrete hardstanding is recommended to dictate the concentration of asbestos within the concrete and whether the material can be reused on-site.

Through undertaking soil chemistry screening, it is evident that there are concentrations of select determinants above the recommended values and the CLR therefore recommends that areas of the site where the soil is potentially hazardous to human health is either removed from the site to an appropriate facility or remediated on-site. Details of all findings from soil sampling are provided in the CLR with recommendations.

SI23: All potentially contaminated sites shall be remediated to internationally accepted standards prior to redevelopment. Any unearthed contaminants will require some form of remediation measures which may require a licence from the Environmental Protection Agency (EPA).

See response to SIO17 above.

9.2 Lighting

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

SI27: To require lighting design to be appropriate to the end use in relation to residential areas, footpaths, cycle paths, urban streets and highways, i.e. use of low-level bollard lighting along cycle paths.

These policies may be addressed together. Public lighting along East Wall Road and in the internal courtyard has been designed to minimise light spillage or pollution in the surrounding environment and residential amenities in accordance with SI26 and SI27. Public lighting plans are submitted as part of this part 8 application. Drawing No. 2746-SMK-XX-ZZ-DR-E-6063 illustrates the proposed new columns and luminaires. The public lighting design shall fully comply with BS5489:2013 lighting class P3.

10 Conclusion

In summary, the proposed development is for social housing on zoned lands under the control of Dublin City Council. The proposed development consists of a mix of apartments and duplex homes with landscaped areas, play area, parking and ancillary works. The proposed development will contribute to the social housing stock in Dublin City.

