

# Planning Statement

Social Housing Bundle 5, Development at Forbes Lane  
Depot

Dublin City Council

*September 2024*



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# 1. INTRODUCTION

## 1.1 Background

This planning report was prepared by MacCabe Durney Barnes on behalf of Dublin City Council and National Development Finance Agency (NDFA), to accompany a Part 8 proposal of 108 no. residential units on a site of circa 0.58 ha in area, located at the Road Maintenance Depot, Marrowbone Lane and Forbes Lane, Dublin 8.

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.

## 1.2 Background to the Part 8 Application

The Social Housing Public Private Partnership (PPP) programme consists of the design, construction, financing and maintenance of approximately 1900 homes as part of Social Housing Bundle 4 & 5 project bundles of social housing developments on sites around Ireland to be delivered by PPP. The Department of Housing, Local Government and Heritage is the approving authority for the programme with the National Development Finance Agency (NDFA) as financial advisor, procuring authority and project manager.

The current bundle no. 4 & 5 includes ten sites 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, house) and site development works.

The Forbes Lane Depot site includes apartment units. 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 NDFA in consultation with Dublin City Council.

## 1.3 Structure of the Planning Report

This planning statement was prepared to accompany a part 8 application for the development of 108 residential units and 190 sqm of community, arts and cultural floorspace, at a site c. 0.58 ha located at the site of the former Road Maintenance Depot, Marrowbone Lane and Forbes Lane, Dublin 8.

- The 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 gives an overview of environmental matters, including ecology, environmental impact assessment and appropriate assessment.

## 2. SITE LOCATION AND CONTEXT

### 2.1 Site Location

The Part 8 site consists of the DCC Road Maintenance Depot site, located at the corner of Forbes Lane and Marrowbone Lane. The site is broadly located south of the Liffey. This is an infill brownfield site located in the Liberties area of Dublin 8. The site is 2km southwest of O’Connell Bridge, 400m north of Coombe Women’s Hospital, 800m southwest of Heuston Station, 300m east of St. James’s Hospital. The Fatima Luas stop is approximately 340 metres to the west of the site. In addition to close access to the Luas red line network at Fatima, the site is adjacent to a number of Dublin Bus routes. There is also a planned cycleway infrastructure upgrades earmarked along Forbes Lane. There is a wide range of facilities and services accessible within a short walk of the site. The surrounding area of Forbes Lane and Marrowbone Lane is generally characterised by commercial and residential uses. Please refer to the Social Infrastructure Audit prepared by MacCabe Durney Barnes for details.

The site is bounded by Marrowbone Lane to the east and Forbes Lane to the north. The Dolphin’s Barn Telephone Exchange is bounding the site to the west and a housing complex is bounding the site to the south. The site boundary consists of tall walls and fencing around the perimeter. Currently there is existing gated access to the site along Marrowbone Lane.

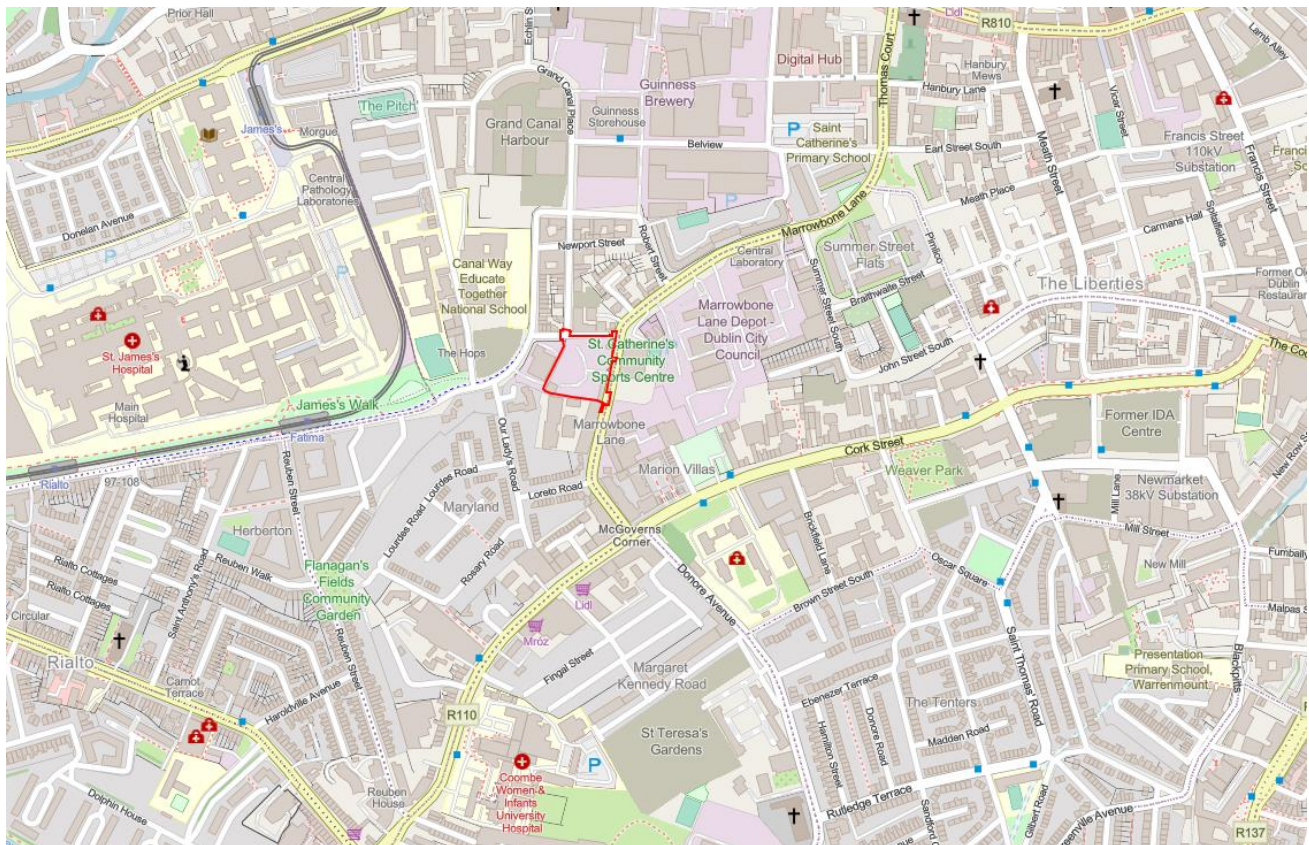


Figure 1: General Site Location

### 2.2 Site Description

The site was formerly used as a distillery in the mid 18<sup>th</sup> century. Currently the site is in use as Dublin City Council’s Road Maintenance Depot and consists of staff services housed in porta-cabin structures and sheds. The Road Maintenance Depot is due to be relocated to a new premises prior to the commencement of development on site. To the north of the site along Forbes Lane, is an apartment complex with heights up to 6

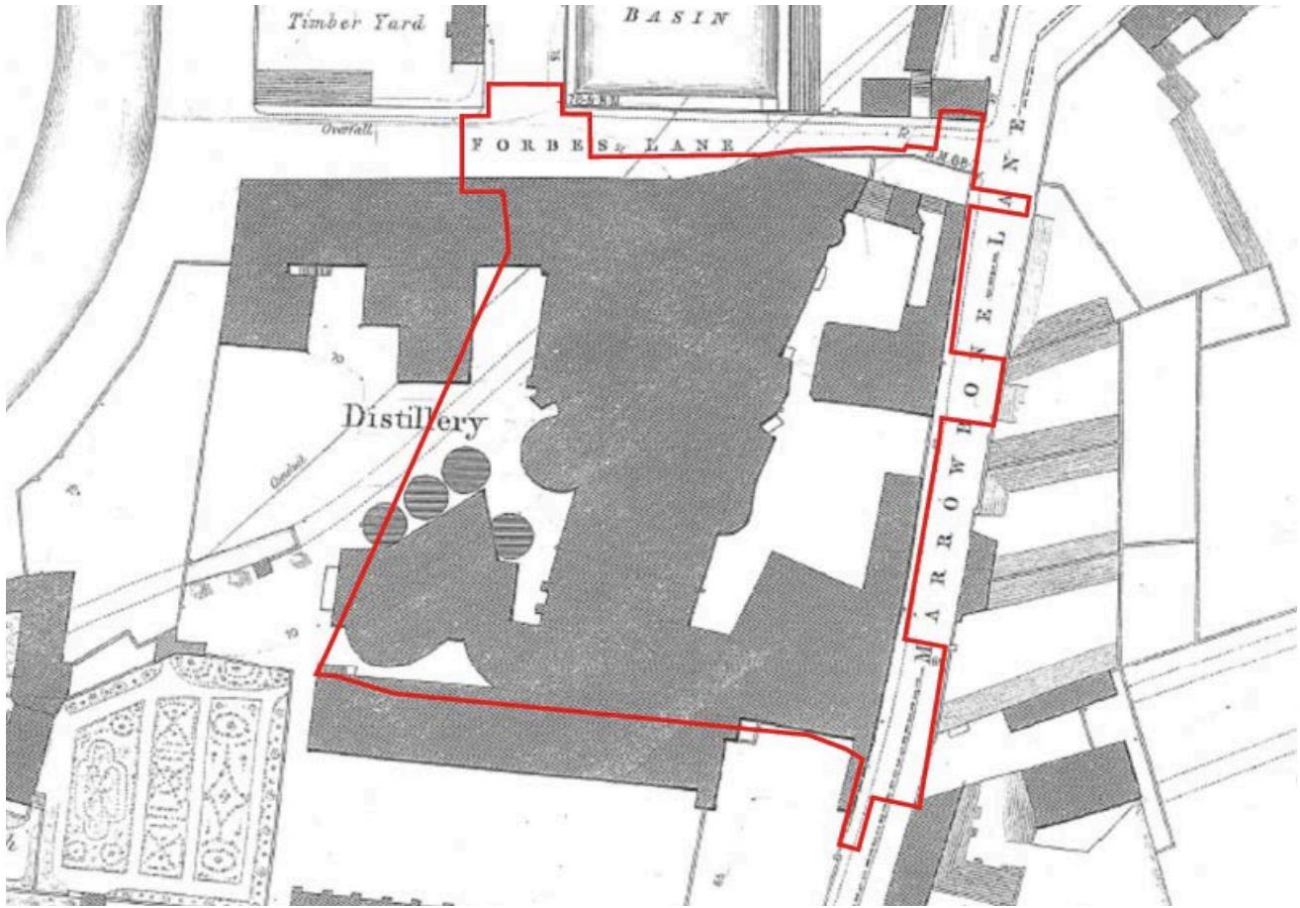


storeys and located to the east of the site is the St. Catherine's Sports Centre, which is managed by Dublin City Council. The centre ranges in height from 2-4 storeys and caters for a range of services and includes an all-weather pitch, conference rooms, sports hall studio, gym, basketball court and community garden. The Malthouse apartment complex bounds the site to the south of the site. To the west of the site is the Dolphins Barn Telephone Exchange, which is between 1-2 storeys in height.

The site boundary consists of tall walls and fencing around the perimeter. The wall forms part of a former grain store and pottery works on the site of Jameson's Marrowbone Lane Distillery. The distillery was founded in the mid-eighteenth century and was acquired by the Jameson family in the late eighteenth century. The distillery was of strategic importance during the 1916 Rising, the site of a garrison under Captains Séamus Murphy, Con Colbert and Thomas McCarthy. During the 1916 Rising in Dublin, the distillery was occupied by a small force of Irish Volunteers, only to surrender at the cessation of the hostilities. A small commemorative plaque can be seen on the stone gate piers facing onto James' Walk, currently serving as the boundary wall to the telecommunications complex. It closed in the early twentieth century.

The Liberty Basin was constructed on the north side of Forbes Lane c. 1820-21 to provide a water supply for the Liberties area. Following its decommissioning a stone warehouse was built over the basin and used for the storage of spent grain for the neighbouring distillery. The remains of the basin were identified during archaeological assessment undertaken prior to redevelopment of a site at the corner of Forbes Lane and Pim Street. The remains of the associated water supply were also identified at the junction at the site and it is possible that further remains survive below the road surface. The existing boundary wall along Marrowbone Lane formed part of the front façade of distillery office buildings and the existing boundary along Forbes Lane formed part of the ground floor of a large 4 to 5 storey distillery building. The walls are of varying ages and materials. The surviving sections of 19th century masonry are fully described in the accompanying Preliminary Architectural Heritage Assessment, but generally consist of brick or calp limestone masonry. The existing boundary walls are not recorded as a protected structure or listed on the National Inventory of Architectural Heritage.





**Figure 2: City of Dublin, Sheet 25 (revised 1847)**

Virtually all traces of the vast distillery were gradually demolished, leaving only a few remnants of the plant's structures standing as boundary walls around a Dublin City Roads Maintenance Depot. Some of the larger distillery structures were used for a few decades for light manufacturing, but gradually all were demolished.

The site is located at the corner of the junction of Marrowbone Lane and Forbes Lane. The pedestrian environment along the site's frontage is poor, with no footpath bounding the site along Forbes Lane. Forbes Lane is 6.5m wide, which includes a 1.1m single footpath on Forbes Lane. Along Marrowbone Lane, the street is 6.9 m wide with a 0.8m and 1.1m footpath on Marrowbone Lane. DCC Development Plan identifies Marrowbone Lane as a key spine road for pedestrian and cyclist travel – new developments required to improve cyclist and pedestrian infrastructure.

The site itself is paved with concrete and used for the storage of vehicles and materials. There are some pre-fabricated administration buildings in the north of the site and a range of small warehouses / sheds used for the storage of materials. The site generally slopes from north-west to south-east with approximately 3m level differences across the site.



*Figure 3: Site Context*

## 2.3 Transportation

The site is located c. 340 metres to the east of the Fatima Luas stop. This gives convenient access to the Luas red line connecting Tallaght to the Point. The site is approximately 500 metres to the south of James Street where the James Street bus stop no. 1996 and the Stevens Lane bus stop no. 1941 are located. These bus stops are served by the G1, G2, 13 and 123 bus routes.

The G1 bus route begins at the Red Cow Luas stop and ends at Spencer Dock. The G2 bus route runs from Liffey Valley Shopping Centre to Spencer Dock. The no. 13 bus route travel from Harristown to Grange Castle. While the no. 123 bus route travels from Walkinstown to Marino.

In addition, two bus stops are located to the south of the site on Cork Street, Marion Villas stop no. 2379 and Brickfield Lane stop no. 2315. These bus stops are served by bus route nos. 27, 56a, 77a and 151. The no. 27 bus travels between Clare Hall and Jobstown. The no. 56a bus route travels between Ringsend Road and Tallaght Square. While the 77a bus route goes from Ringsend Road to Citywest. The 151 runs from the Docklands to Foxborough.



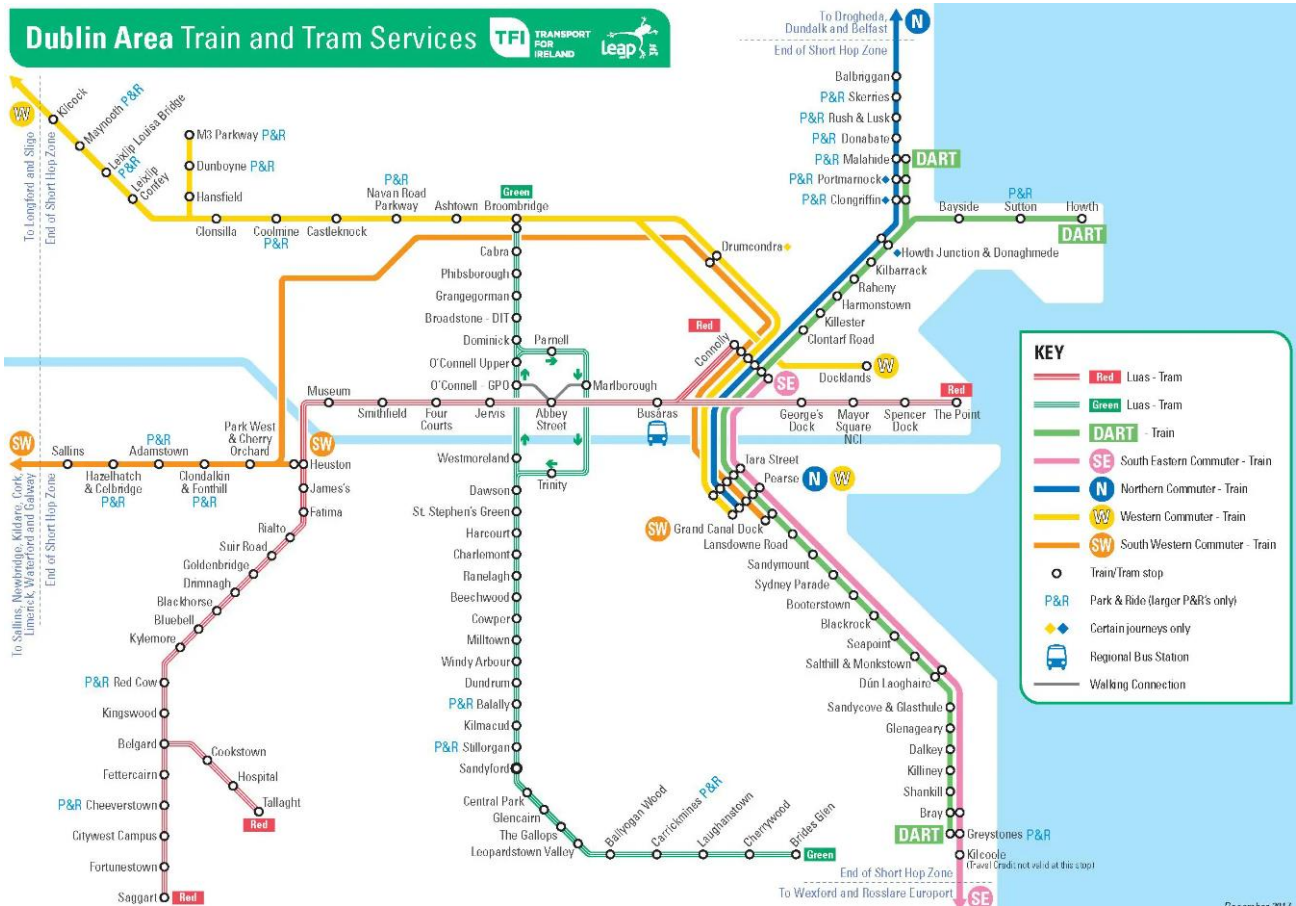
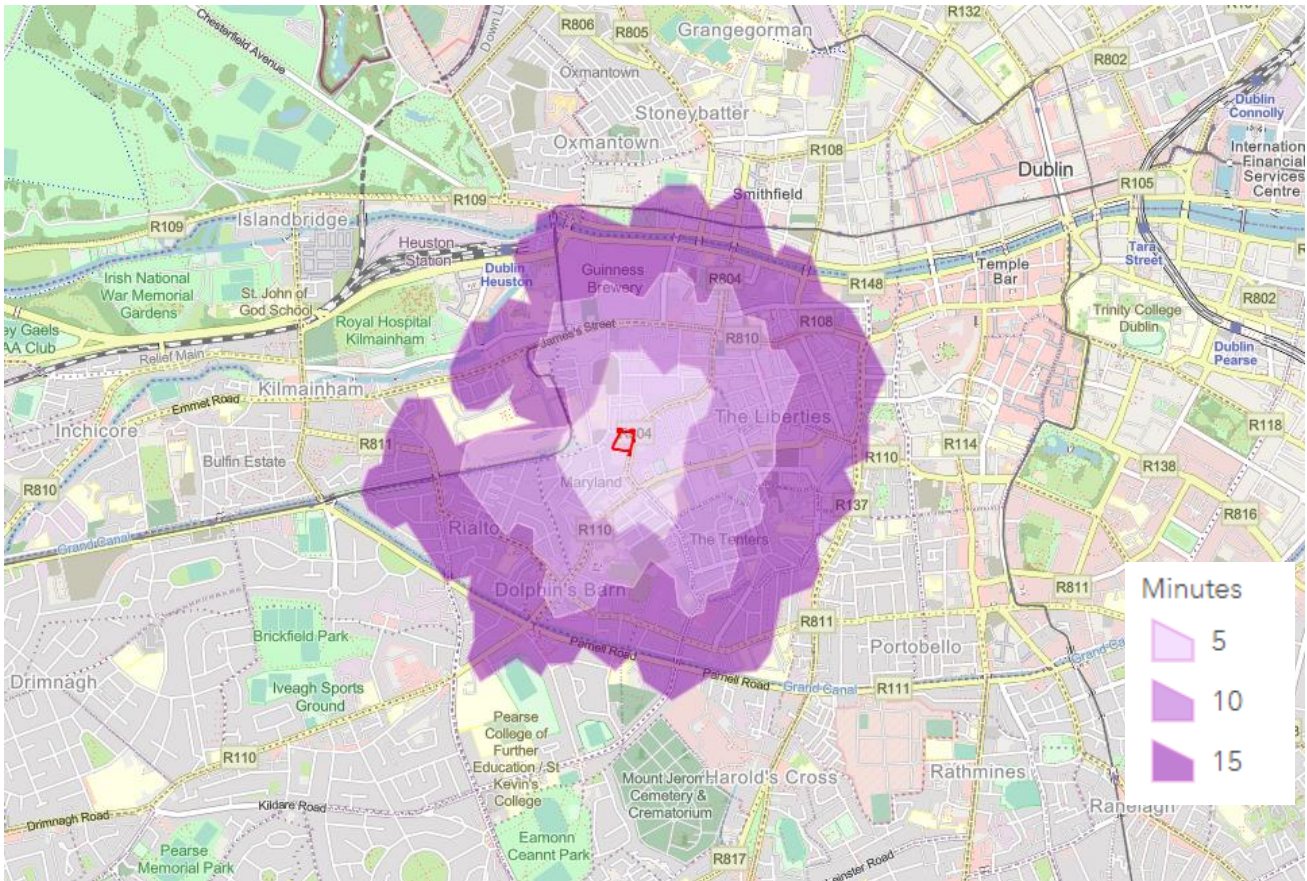


Figure 4: Existing Luas Line in the context of the Subject Site (Source: TFI, 2017)

In addition to the current routes servicing the subject site, a number of improved services are earmarked for delivery that are relevant to consider in the context of the proposed development.

### 2.3.1 Accessibility

A key priority of the Development Plan is to create sustainable neighbourhoods, with a range of households types and tenures located in close proximity to community facilities and services in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. The below map illustrates the walkability of the site to surrounding neighbourhood centres, services and amenities, which will be expanded upon in this report.



**Figure 5: Walkability Patterns in 5,10 and 15 minute intervals (Source: ArcGIS)**

### 2.3.2 BusConnects

The aim of Bus Connects is to enhance bus infrastructure by improving speed, efficiency and reliability along the 16 corridors, while providing enhanced walking and cycling facilities through the provision of dedicated cycle lanes that are separated from traffic as much as possible. The overall objective of the Bus Connects project is to support the development of a sustainable and integrated public transport system in the Dublin Region that enables the delivery of compact urban growth that is sustainable and supports a low carbon future.

The proposed revisions to the bus network under the BusConnects programme will result in the subject site having access to buses travelling at a frequency of 15 minutes intervals during the weekdays from the James's Street to the north with the G spine bus routes, with these services now operational. The site also has access to the D spine routes located on Cork Street to the south of the site, and this spine will consist of 5 bus routes. The D1 bus route provides travel from Clongriffin Station to Foxborough. The D2 bus route travels between Clanehall and Citywest. The D3 bus route serves travel between Clongriffin Station and Deansrath. The D4 bus route travels from Santry to Ellensborough. Finally, the D5 bus route provides travel from Blunden Drive to Tallaght. The BusConnects plan in the context of the subject site is illustrated below.



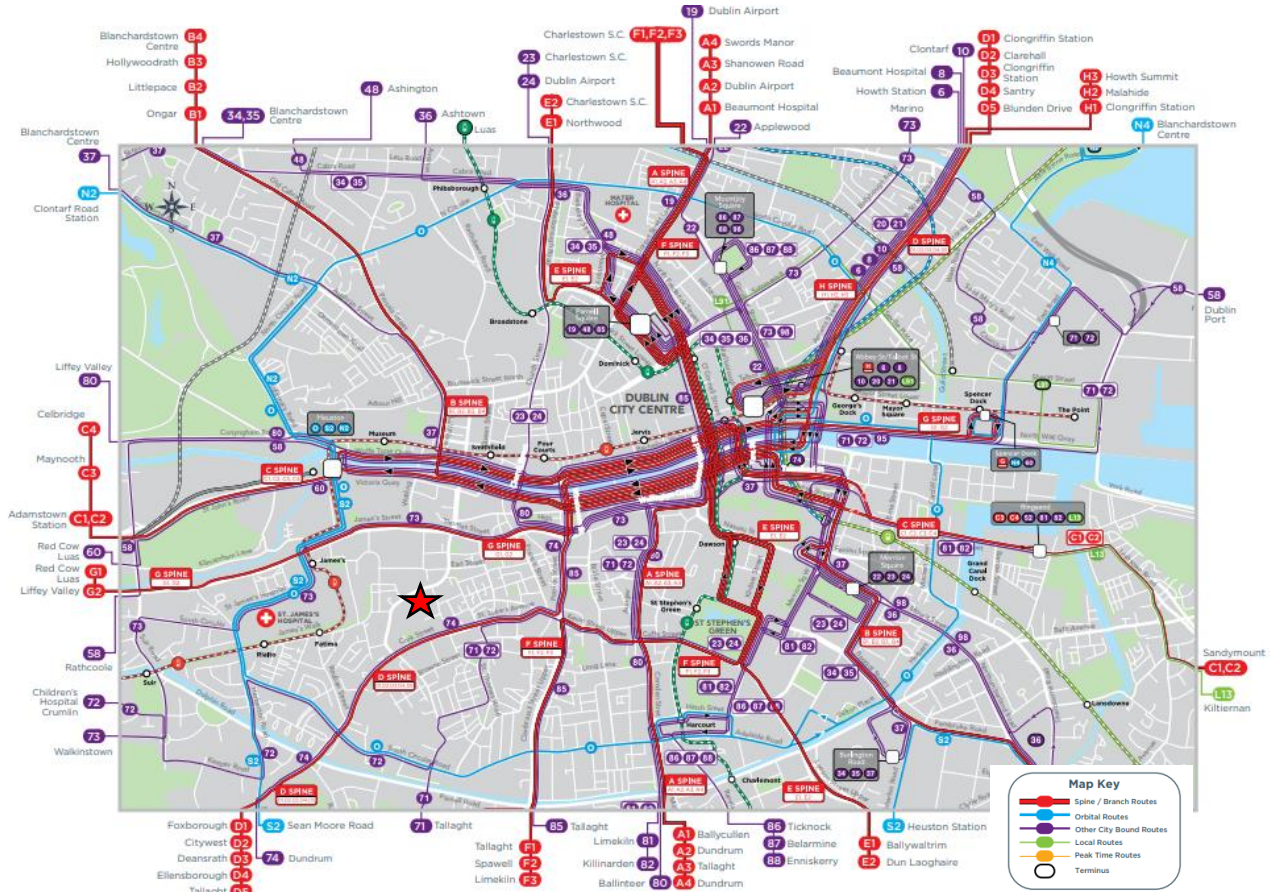


Figure 6: City Centre Area BusConnects Map (Source: NTA, 2022)

### 2.3.3 Cycling

Improved cycling facilities are proposed as part of the proposed Bus Connects Core Bus Corridor project along Cork Street and Thomas Street. The NTA have revised the Greater Dublin Area Cycle Network Plan in January 2023. The subject site will link to the Bus Connects cycling infrastructure via the proposed primary route on James’s Walk and Pim Street. The Dublin City Council’s Active Travel Network Programme is set to expand the existing network from 10km to 310km across the city. The proposed programme illustrated below demonstrates that the development site will be located in close proximity to high quality active travel infrastructure, which will allow for greater ease of accessibility to social and community infrastructure.

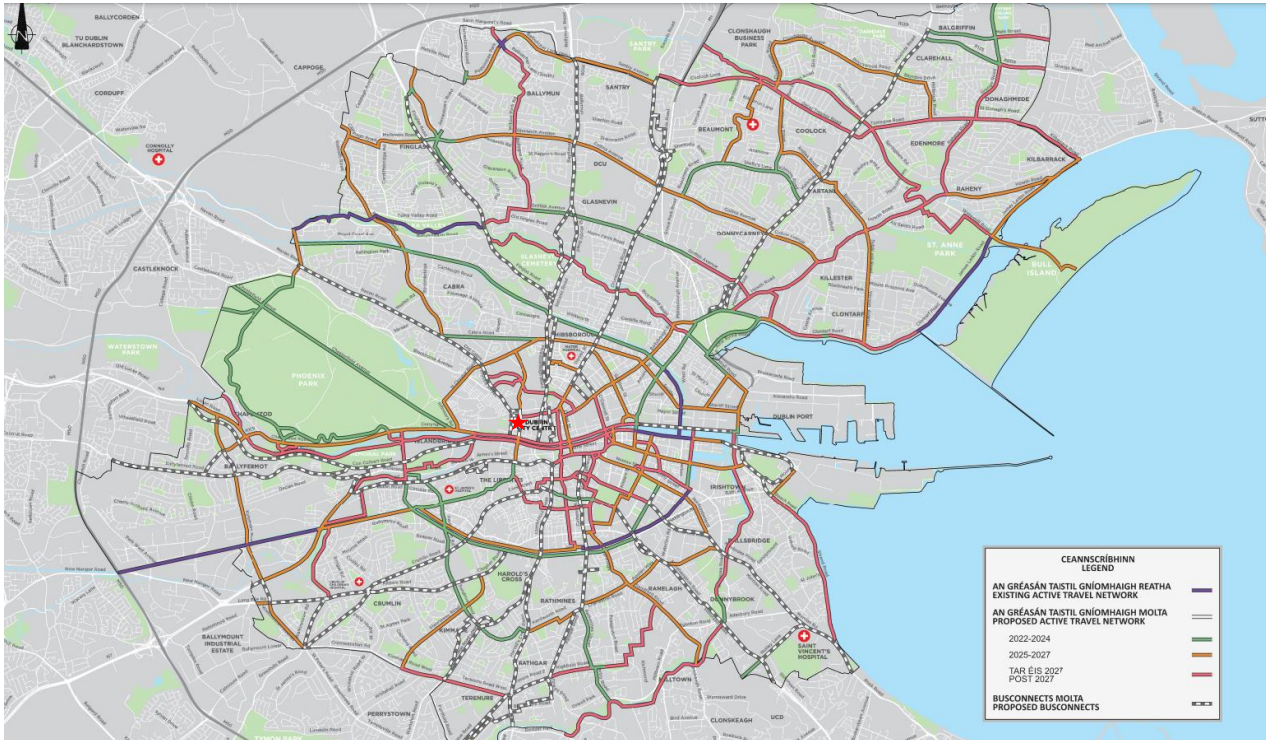


Figure 7: Proposed Active Travel Network Post 2027 (Source: DCC)

### 2.3.4 Active Travel Improvements

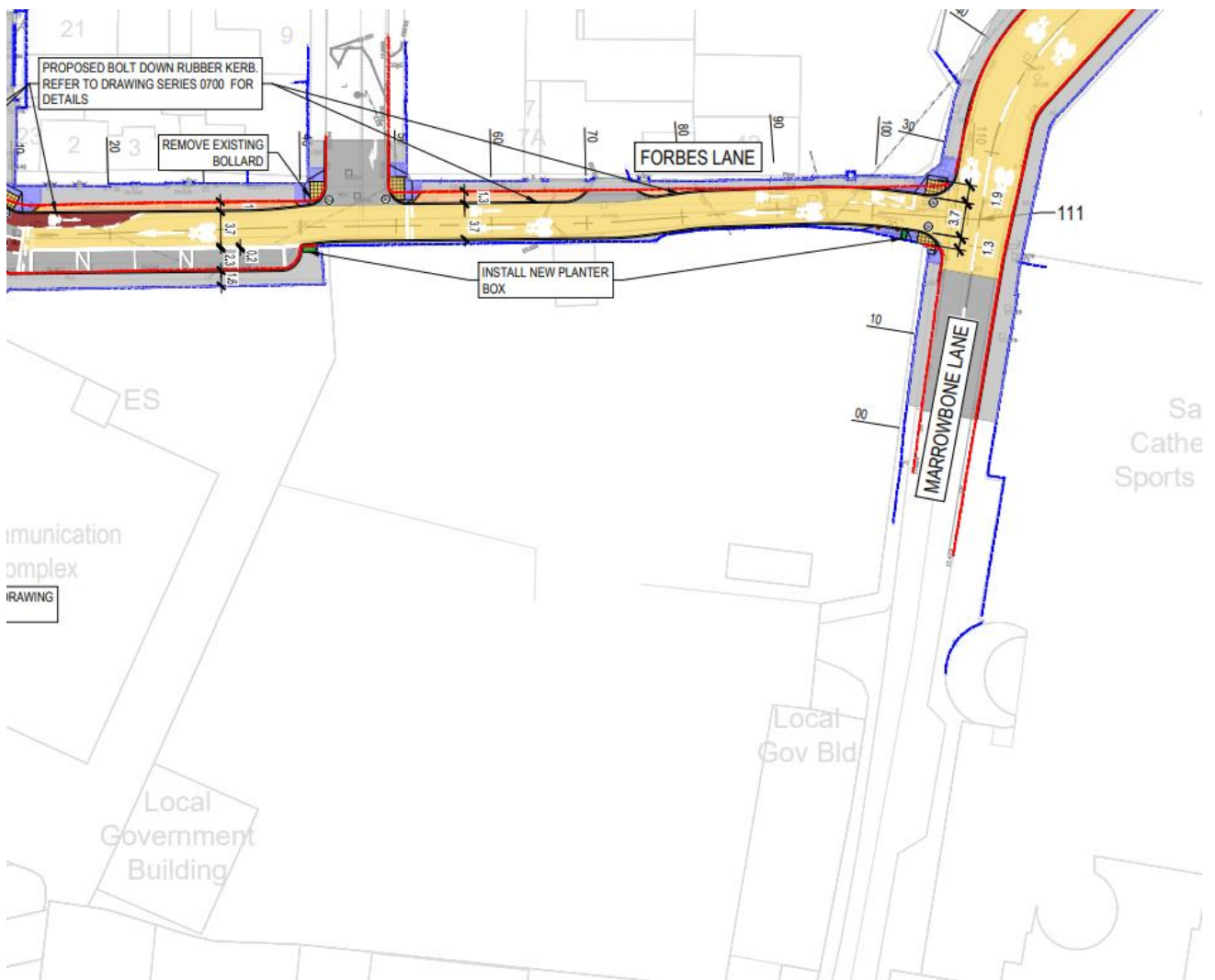
The Kilmainham to Thomas Street Active Travel Project is part of the Dublin City Council (DCC) core active travel network and is funded by the National Transport Authority (NTA). It will provide 2.6km of high quality walking and cycling facilities from Kilmainham Gaol to Thomas Street, extending from the South Circular Road /Kilmainham Lane junction along South Circular Road, Suir Road, Grand Canal View, St James Linear Park, James Walk, Forbes Lane, Marrowbone Lane and Thomas Court to the junction with Thomas Street.

The project is being delivered on a phased basis, with the Suir Road to Thomas Street Interim Scheme having commenced construction in Q3 of 2023. The second phase is a permanent scheme which will be delivered between 2024 and 2026. A non-statutory public consultation was held for the Suir Road to Thomas Street Interim Scheme from Monday 3rd October 2022 to 2nd December 2022. In addition, a second non-statutory public consultation was ran between 13th of June 2024 and 11th July 2024.

The Interim Scheme from Suir Road to Thomas Street will deliver 1.8km of new walking and cycle facilities including:

- A two way segregated cycletrack along James Walk using lane dividers and bollards.
- A one way protected cycletrack along Marrowbone Lane using flexible kerbs and bollards, both sides (from Robert Street South to Summer Street South).
- New road markings, cycle logos and traffic signage across the route.
- Improvements to all pedestrian crossings along the route.
- A shared use lane for car traffic and cyclist traffic on Grand Canal View, Forbes Lane, Marrowbone Lane (Forbes Lane to Robert Street South) and Thomas Court.

The proposed interim scheme design of James’s Walk/ Forbes Lane/ Marrowbone Lane is presented in the general arrangement drawings below. The second phase of delivery of the scheme will also include the upgrading of the interim measures already installed along Forbes Lane and Marrowbone Lane.



**Figure 8: Extract of Kilmainham to Thomas Street Cycle Route (Source: DCC)**

As part of the design process, the Design Team consulted with the Active Travel unit of DCC to ensure the proposed development does not encroach on the planned Kilmainham to Thomas Street Cycle Route. The proposed partial demolition of the existing boundary walls and the set back of the new building line will facilitate the delivery of the route along the northern boundary of the site, which will be subject to a separate consent process.



### 3. PLANNING HISTORY

#### 3.1 Subject Site

There is no planning history on the Part 8 site.

#### 3.2 Surrounding Area

There is a rich planning history in the immediate vicinity of the site. The most relevant applications are presented below.

PA. Reg. Ref. 2777/21 and ABP Ref. 311019: Immediately west of the site at the Eir Exchange, junction of James’s Walk and Forbes Lane, the proposed development submitted by Eir consisted of the construction of 18m high telecommunications monopole and associated equipment. Following an appeal to An Bord Pleanála, the development was granted permission on 17<sup>th</sup> January 2022.

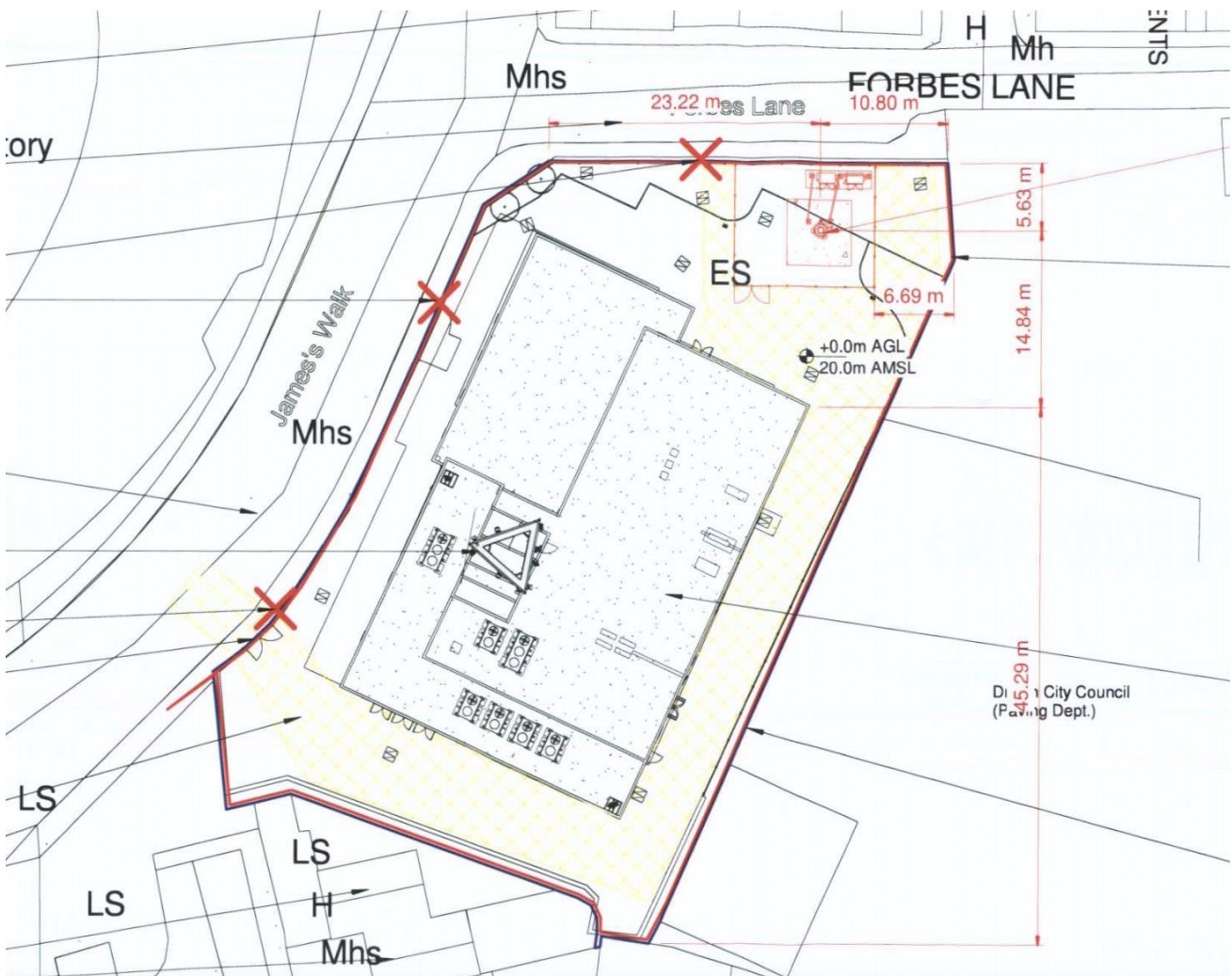


Figure 9: Existing and Permitted Development adjacent to site (Source: Towercom)

PA. Reg. Ref. 2205/19 and ABP Ref. 304331: Development consist of 28 no. build to rent units located on Long’s Place. Following an appeal to An Bord Pleanála, the development was granted permission on 30<sup>th</sup> August 2019.

ABP Ref. 315306: The Land Development Agency applied for the construction of 543 no. apartment units, retail, café unit, mobility hub, childcare facility and community/ artist workspace at the former St Teresa's Gardens, Donore Avenue, Dublin 8. The development was granted permission on 27<sup>th</sup> June 2023.

ABP Ref. 300184: A Strategic Housing Development was submitted to An Bord Pleanála by Cairn Homes located at The Donnelly Centre, Cork Street Dublin 2. Development consisted of 399 student accommodation bed spaces with associated ancillary services and a retail/ café unit with frontage onto Cork Street and Brickfield Lane. The development was permitted on 27<sup>th</sup> February 2018.

ABP Ref. 308162: A Strategic Housing Development was submitted to An Bord Pleanála by Alphabet ABC Properties Limited in 2020 at The Old Glass Factory and no's 113-117 Cork Street and no's. 118-122 Cork Street, Dublin 8. The proposed development comprised the demolition of existing buildings and construction of 397 no. bedspace build to rent shared living residential development and associated site works.

PA. Reg. Ref. 3843/19: An application was submitted by Canal Way Educate Together, Basin View, Dublin 8 and granted permission on 28<sup>th</sup> January 2020. The permitted development will consist of: 1) the demolition of the existing cycle shelter to the north of the site; 2) the provision of a new temporary, two storey prefabricated block - approx. 475 sqm total area - comprising 6 no. mainstream classrooms, ancillary accommodation and sanitary facilities with obscured glazing to the windows on the first floor northern elevation; 3) the repositioning and widening of the entrance gates from Basin View and; 4) all associated site and drainage works.

PA. Reg. Ref. 3344/24: The proposed development consists of a change of use of areas at ground floor of 'The Brickworks' student accommodation development from educational use to student accommodation, to provide 38 no. additional student accommodation bedspaces in 6 no. clusters (1 no. 3 bed cluster, 1 no. 5 bed cluster, 1 no. 6 bed cluster, and 3 no. 8 bed clusters).

ABP Ref. 314056: An application for the Liffey Valley to City Centre Core Bus Corridor Scheme was submitted by the NTA in 2022. The proposed scheme extends over a distance of 9.2km from the new Liffey Valley Shopping Centre bus interchange at its western end to High Street in the city centre to the east. The proposed scheme will travel over distributor roads from the shopping centre before continuing over the M50 and alongside residential areas on both sides of the road at Palmers Drive and Coldcut Park. The proposed scheme then passes Cherry Orchard Hospital and Cherry Orchard Industrial estate and through residential areas to the west of Ballyfermot. The route continues through Ballyfermot civic centre, then past school grounds and Markievicz Park, a pitch and putt course and GAA pitch along the R833. The route travels along James's Street and Bow Lane West, north of the site.

PA. Reg. Ref. 3853/17 and ABP. Ref. 302149: An appeal was lodged to An Bord Pleanála in respect of development at 43-50 Dolphin's Barn Street. Permission was subsequently granted on 24<sup>th</sup> October 2018. The development consisted of the demolition of existing structures and the construction of a part 4 to 7 storey residential/ retail building, stepped down to 3 storey to the rear, over basement and ground floor retail and car park with 1 no. retail unit at ground level and 70 no. apartments from first to sixth floor level.

At the same site, a Strategic Housing Development was lodged under ABP Ref. 312295 on 21<sup>st</sup> December 2021. The application consisted of the demolition of buildings, construction of 116 no. build to rent apartments and associated site works. The case was due to be decided by 20<sup>th</sup> April 2022; however, a decision is still outstanding.

PA. Ref. Ref. 4758/18: Proposed development comprised an extension to provide 10 no. additional apartments to an existing development of a 28 no. apartment block ranging from 4 to 7 storeys in height over a basement. The development is located at the Hops, 9B/10, Basin View, Dublin 8. The application was granted permission on 27<sup>th</sup> March 2019.

PA. Reg. Ref. 4588/22 consists of a development at a site of 4.58 ha at the existing Guinness Brewery lands. The development consists of the redevelopment and repurposing of the existing Guinness Brewery Lands to the south of James Street and Thomas Street to accommodate a mixed use development to be known as the Guinness Quarter. The development includes 2 no. hotels, commercial office buildings, 336 residential units (including some build to rent), market hall, food hall, retail/ café/ restaurant/ public house/ bar use, community uses and extensive public realm and landscape squares. The development was granted permission on 2<sup>nd</sup> August 2023.

PA. Reg. Ref. 3209/19: Mixed use development comprising 550 build to rent apartments along with retail, medical, cafes, restaurants, childcare facility and co-working spaces. Buildings height range from three storeys to thirteen storeys over basement. The application was granted on 7<sup>th</sup> January 2020. The permission has been amended by PA. Reg. Ref. 2514/20, 2765/20 and 3405/23.

## 4. SITE SELECTION AND CONSIDERATION OF ALTERNATIVES

### 4.1 Site Selection

The subject land is in the ownership of Dublin City Council and therefore can be efficiently to meet some of the demand for social housing arising in Dublin City. The site is located in the City Centre. The Dublin 8 area has experienced significant growth in recent years with numerous large scale housing development granted in the Dublin 8 area in recent years, The wider area of the site is undergoing significant regeneration and densification of underutilised sites that should see a corresponding increase in local population that will support local services and facilities. There has been a push at all levels of planning policy to reuse brownfield and infill sites in central locations, so as to promote compact growth. Site selection was restricted to consideration of land in the ownership of Dublin City Council, and which could be adequately serviced and integrated to provide much needed social housing.

The site is located within the boundary of the Strategic Development and Regeneration Area (SDRA) Liberties and Newmarket Square 15. The SDRA lands are critical to the core strategy of the City Development Plan. All SDRAs have been examined to determine capacity for future housing growth, taking into account sustainable densities. It is considered that these areas are capable of delivering significant quantities of homes and employment for the city. Under Table 2-8 Core Strategy and Settlement Hierarchy, the character and general density applied would be mixed use with a planned residential yield of 2,500 units and an estimated population of 5,000 persons for SDRA 15. The site has also been earmarked for development under the guiding principles map of the SDRA 15.

Site selection has taken a plan-led approach to development having regard to the residential zoning provisions and SDRA 15 in the Dublin City Development Plan 2022-2028 (CDP). The site is zoned Z1 Sustainable Residential Neighbourhood. Having regard to the above, there are no impediments to proceeding with the site.

The site located in an established neighbourhood of the Liberties, in close proximity to shops and community facilities, Luas line and several bus stops. It is ideally located to meet the principles of the 15-minute City as envisaged in the Dublin City Development Plan 2022-2028.

### 4.2 Consideration of Housing Tenure and Types

The provision of social housing on this site will facilitate diversity in tenure and facilitate housing mix in the City Centre. This area of Dublin City has undergone significant development in recent years. However, much of it has consisted, to date of student accommodation, which is, by nature, more transient and medium term. Providing permanent homes in this area will continue to sustain public services in the area, while also delivering community, arts and cultural space.

The area is dominated by private housing with over 72% either rented or owned according to the 2022 census of population<sup>1</sup>. Just 19% of the housing stock consist of housing rented either from the local authority or from a voluntary body. With the provision of 108 units, the share of social housing in the overall stock in the area would rise from c.19% to c.20%.

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<sup>1</sup> Using data extracted in relation to the South West Inner City Local Electoral Area

The site is located in area L of the Council's Housing Waiting List. Data from October 2023, shows that there are 32 households requiring band 1 housing (the highest priority), 465 in band 2 and a further 398 in band 3, or a total of 895 households. A further 1357 are on the transfer waiting list for area L. With a combined total of 2252 households, there is a strong demand for accommodation in the area. It is also important to note that around 604 of these households have been on the list for over ten years.

Importantly, the housing waiting list for area L shows strong demand for one-bed units, with 80% of the list requiring a one-bed unit. Similar observations are made in relation to the transfer list, with 53% of the list seeking a one-bed unit. In this regard, the proposed development will positively respond to the housing need in the area. The site is located in one of the two sub-City Housing Needs and Demand Assessment (HNDA). The site is located in the Dublin 8 HNDA. Under Table 37 of the Development Plan, the plan states that '*Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department.*' Therefore, on review on the needs identified for area L, the proposed mix is acceptable.

The site is located in the City Centre and therefore is located close to a range of facilities and public transport. In the Core Strategy, the CDP emphasises compact growth and supports the sustainable development of brownfield and infill sites. This reflects the contents of the Apartment Design Guidelines which recognise in section 2.3 that a greater proportion of housing should take place within the existing built-up footprint of cities, with a brownfield and infill sites playing an important role. It is therefore considered that the provision of apartments at the Forbes Lane site to be appropriate and fully compliant with the provisions of national, regional and local policy and will support a diversification of the housing stock, particularly the tenure.

### 4.3 Consultation

DCC Housing Department with the Project Architects and Local Area Office held a public information session on the 16<sup>th</sup> November 2023. The consultation was well attended by residents in the community. The Design Team considered all issues raised during the consultation event as part of the design process.

## 5. CONSIDERATION OF DESIGN

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high-quality residential development, creating a sense a place for its residents whilst integrating into the existing built environment. The layout is particularly derived from the infill nature of the site. The site has main frontage on Marrowbone and Forbes Lane but is currently bounded by high walls and fencing. Along Marrowbone and Forbes Lane, the streets are narrow and the pedestrian environment is of poor quality. A key priority of the design of this scheme was to ensure sufficient carriageway space for the future provision of an active travel network.

The existing boundary walls were used primarily to secure the depot lands contain remains of the old distillery buildings that once occupied the site. All distillery buildings have been demolished, the remains of the distillery walls form the boundary along the site. As mentioned above, the exiting street widths on Forbes and Marrowbone Lane are narrow, which are caused by the existing boundary walls of the depot site and building lines. The Development Plan identifies Marrowbone Lane as a core pedestrian spine and greening, cycling and pedestrian core. While DCC's Active Travel Plan envisages a two way cycle track along Forbes Lane. The now lapsed Liberties Local Area Plan also proposed street widening measures along Marrowbone Lane. In order to provide new access arrangements to the site and facilitate pedestrian and cyclist improvements along Marrowbone and Forbes Lane, it is necessary to remove some of the existing boundary walls and set back the proposed building lines to facilitate these planned improvements and provide a new active street frontage at ground floor level.

Another key consideration to the design of the development, was adopting a reduced or wholly eliminated approach to car parking at the site. As part of the design process, in consultation with DCC, it was determined that owing to the site's context in proximity to high-quality public transport and infill nature, a zero parking approach is appropriate.

The SDRA Liberties and Newmarket Square 15, site-specific guiding principles illustrated under area 6 of the SDRA, also guided the design approach of the site. The adopted SDRA block form also follows a similar layout prepared by DCC in a feasibility study of the site, which estimated the development potential of 84 no. units with a suggested height of 2 to 6 storeys. However, the SDRA 15, has informed the height requirements across the site, with the SDRA citing that base heights should range between 6-8 storeys.

The client brief has initially envisaged that 110 units would be provided onsite. Upon design, 108 can be accommodated without impacting on the surrounding area.

## 6. PROPOSED DEVELOPMENT

### 6.1 Project Description as per Public Notices

The proposed development is described as follows in the public notices.

Notice is hereby given of the construction of 108 apartment units at a site c. 0.58 ha at the Road Maintenance Depot, Marrowbone Lane and Forbes Lane, Dublin 8. Development at the site will consist of the following:

- The demolition of the existing sheds and garages and site clearance works
- Partial retention and modification of the existing rubble stone wall fronting Forbes Lane.
- Retention and modification of the former Gate House structure's east elevation along Marrowbone Lane. The removal of the remaining existing boundary wall fronting Marrowbone Lane and subsequent widening to facilitate an active travel route which will be subject to separate consent.
- Construction of 108 no. apartment units in two blocks (Block A and Block B) with frontage onto Marrowbone Lane and Forbes Lane comprising 108 residential units (64 no. 1-bed, 31 no. 2-bed, 13 no. 3-bed)
  - Block A ranges from 6-7 storeys and consists of 81 residential units (50 no. 1-bed, 19 no. 2-bed, 12 no. 3-bed)
  - Block B is 5-storeys and consists of 27 residential units (14 no. 1-bed, 12 no. 2 bed, 1 no. 3-bed)
- 165 long-stay and 54 short-stay bicycle parking spaces and 2 car parking spaces.
- 190 sq.m of community, cultural and arts space.
- 800 sq.m of public realm space and 700 sq.m of communal open space.
- One vehicular access is proposed from Marrowbone Lane. A pedestrian and cycle access route is proposed at Forbes Lane which also provides emergency vehicle access.
- Traffic calming measure in the form of raised tables are proposed on the public road at the intersection of Pim Street and Forbes Lane and between the proposed vehicular access and Marrowbone Lane. A new signalised crossing point is also proposed on Marrowbone Lane.
- Boundary treatments, landscaping and public realm works, public lighting, site drainage works, internal road surfacing and footpath, ESB substation and meter rooms, stores, bin and cycle storage, plant rooms; and
- All ancillary site services and development works above and below ground.



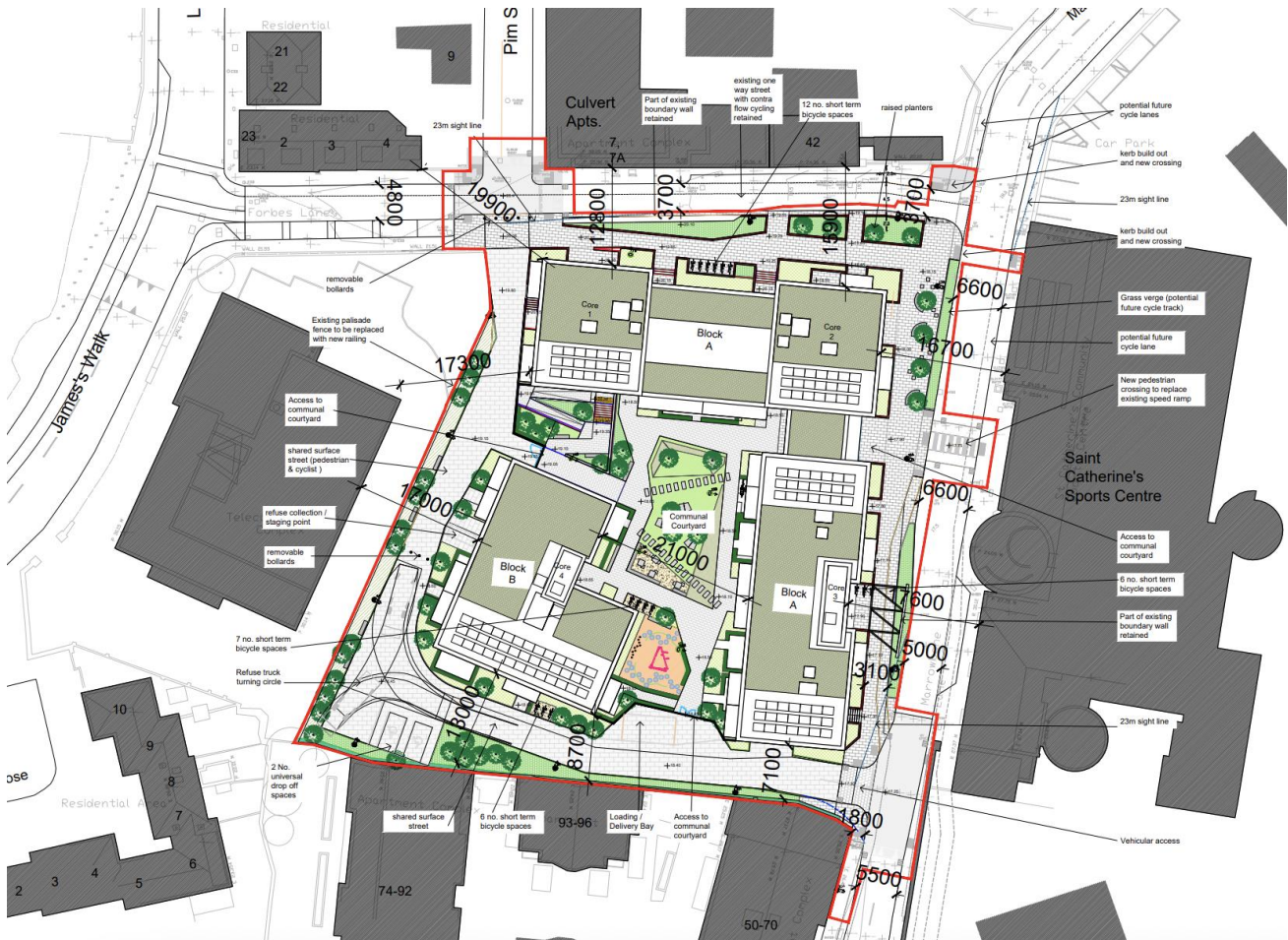


Figure 10: Site Layout (Source: McCorm Architecture and Urban Design)

## 6.2 Detailed Description

A detailed description of the proposed development is outlined in this section.

Table 1: Proposal Details

Development Parameters	Summary
Parameter Site Proposal	Gross site area: c.0.58 ha Net site area: c.0.53 ha
No. units	108 apartment units (64 no. 1 bed, 31 no. 2 bed and 13 no. 3 bed)
Non-residential uses:	190 sqm of community, arts and culture
Density	Gross Density: 186 uph Net density: 203.8 uph
Plot Ratio	1.91

Development Parameters	Summary
Site Coverage	48%
Dual Aspect	59 units
Car Parking Overall	2 car parking spaces
Bicycle Parking Overall	Total: 219 bicycle spaces (165 no. long stay and 54 no. short stay)
Height	5 to 7 storeys
Public Open Space	800 sqm public realm space
Communal Open Space	700 sqm

The breakdown of the overall residential unit types is as follows:

Unit Type	1 bed Apartment	2 bed Apartment	3 bed Apartment	Total
No. of units	64	31	13	108
% of Apartments	59%	29%	12%	100%

Block A consists of 81 residential units (50 no. 1-bed, 19 no. 2-bed, 12 no. 3-bed) and Block B consists of 27 residential units (14 no. 1-bed, 12 no. 2 bed, 1 no. 3-bed).

### 6.3 Design Rationale

The proposed design has been informed by the SDRA 15 indicative built form of the development site, The proposed block structure will create a new urban edge along Marrowbone and Forbes Lane. The placement of the 'L shaped' blocks enclose to form a secure central communal open space. The built form at the site is rotated slightly creating splayed setbacks to Forbes Lane and Marrowbone Lane, effectively widening the street and providing space for street planting and greening, The setback along Forbes Lane also facilitates additional space for the future active travel route being delivered under a separate works contract and application. The new street frontage proposed will create high levels of street activity and positively contribute to the public realm improvements at the site through the proposed paved granite and raised planters, street trees and informal public seating area at the junction of Marrowbone and Forbes Lane.

In consultation with the DCC archaeology, conservation and active travel departments, the proposal has endeavoured to deliver a balanced approach to the competing demands on site. The proposed scheme includes the partial retention and modification of the existing rubble stone wall fronting Forbes Lane. Additionally, it is proposed to retain and modify the former Gate House structure's east elevation along Marrowbone Lane. The remaining boundary wall stonework and brickwork will be salvaged and incorporated into the new feature wall

along the proposed shared surface street. The below CGIs illustrate the proposed modification and retention of the existing boundary walls along Marrowbone Lane and Forbes Lane.



View along Forbes Lane

Image 51 - View Historic Wall being retained on Marrowbone Lane

**Figure 11: CGIs of proposed retention and modification of existing boundary walls (Source: MCORM & Digital Dimensions)**

The SDRA suggests that base heights of 6-8 storeys should be feasible on the lands subject to detailed and appropriate design. The proposed development ranges from 5 to 7 storeys. The proposed Block A defines a new urban edge along Marrowbone Lane and Forbes Lane, and is 6 storeys with a seventh storey proposed at the northwest and northeast corner of the building. The proposed height of Block B is 5 storeys. The proposed height ensures that both blocks receive high levels of daylight and sunlight into the courtyard area and there is no impact on the residential amenity of buildings adjoining the site.

Due to the site's location within a SDRA, the subject development includes the provision of community, arts and cultural space at the site. The proposal of 190 sqm is located in the ground floor of Block A in two dedicated spaces of 130 sqm and 90 sqm respectively. The placement of the community, arts and cultural space will also link with the proposed public realm improvements along Marrowbone Lane and Forbes Lane and create synergies between the internal and external space at this prominent location as well as the existing community centre located adjacent to the site.

The proposed materials and finishes have been informed by the historic industrial buildings in the area by proposing a traditional red brick material with off-white mortar colour. Variety is proposed through red concrete detailing and contrasting charcoal window frames and balcony finishes. In addition, as part of the design to commemorate the site heritage it is proposed to reuse the existing materials from the boundary walls that are proposed to be removed as part of the development. The salvaged materials of stonework, brickwork and granite cills will be reused to reclad the south and west boundaries of the site.

A new vehicle access point is proposed along Marrowbone Lane and a pedestrian and cyclist access point at Forbes Lane is also proposed. A shared surface space is provided from the north access point to the new eastern vehicle access point. The access point at Forbes Lane will also be capable of accommodating emergency vehicle access. Retractable bollards will be in place at the access point and along the shared surface space proposed within the development site. The use of retractable bollards will ensure that there is no through traffic at the site and ensure that pedestrians and cyclists' movement is prioritised within the development.

## 7. PLANNING POLICY

### 7.1 National Policy

#### 7.1.1 National Planning Framework

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*". The application site is located in built-up envelope of Dublin City.

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 on Forbes Lane and Marrowbone Lane. The proposed layout caters for communal open space and public realm space. It includes 190 sqm of community, arts and cultural space which will serve both prospective and existing residents to allow for the creation a cohesive community in the development.

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*".

Given the city centre location, the provision of 108 homes at the Forbes lane depot site is considered adequate.

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 homes that includes 29 no. universally designed units.

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 has a density of 203.8 uph with heights ranging from 5 to 7 storeys. The proposed height is aligned with recently permitted heights in the area. The proposed infill development includes a new frontage onto Marrowbone Lane and Forbes Lane. Its most recent use is at odds with prevailing uses in the area. The proposed development is therefore considered to positively respond to the objective.

In summary, the proposed development is a city centre location with a wide range of amenities and transport options within easy reach. The proposed redevelopment of the Dublin City Road Maintenance depot is aligned with the policies and objectives of the NPF.

### 7.1.2 Climate Action Plan 2024

The Climate Action Plan 2020 is the roadmap to deliver on Ireland’s climate ambition. It takes account of the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed in 2022. The plan reiterates the targets set out under the Climate Action and Low Carbon Development (Amendment) Act 2021 which seeks a reduction of 51% on GHG emissions by 2030 compared to 2018 levels and to achieve climate neutrality by 2050.

In relation to the decarbonisation of housing, the plan identifies Key Performance Indicators (KPI) and abatements, the former serving as a key metric. The following themes and associated KPIs are relevant:

Theme	2025 KPI	2025 abatement (vs 2018 MtCO <sub>2</sub> eq)	2030 KPI	2030 abatement (vs 2018 MtCO <sub>2</sub> eq)	2031-2035
<b>Standards and Regulations</b>	All new dwellings designed and constructed to NZEB standard.  170,000 new dwellings using a heat pump.	0.3	All new dwellings designed and constructed to NZEB standard.  280,000 new dwellings using a heat pump.	0.4	Minimum Energy Performance Standards for all dwellings

All units provided will be to the appropriate standards. Please refer to Climate Action Energy Statement, Sustainability & Part L Report accompanying this application.

In addition, the plan considers the recommendations of the Climate Change Advisory Council which particularly note the need to shift away from car dependency through the consideration of land use and housing policy. It also considers the need to colocation or proximity with transport.

The proposed development will help to achieve the targets set by the Climate Action Plan 2024 in the following ways:

- The provision of high residential density and in accordance with the NPF providing for compact growth in close proximity to existing community facilities and amenities.
- The application site is within walking and cycling distance to Luas line and BusConnects route. The provision of additional residential and community uses in this location will support the existing public transport serving the area and will make the provision of further public transport options (such as increased frequency of services) viable.
- Bicycle parking storage has been provided.

The proposed development therefore accords with the Climate Action Plan 2024.

## 7.2 Ministerial Guidelines

A number of national planning guidelines may be considered.

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities (2007)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Urban Design Manual – A Best Practice Guide (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 Street (2019)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018)
- Design Manual for Quality Housing (2022)

### 7.2.1 Guidelines for Planning Authorities on Childcare Facilities (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 108 units, 64 of which are one-bed units means that the 75-unit threshold set out by the Childcare Facilities Guidelines for Planning Authorities (2001) is met. 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). In total, this results in 34 no. 2 and 3 bed units that may generate demand for childcare spaces.

A Social Infrastructure Audit was prepared by MacCabe Durney Barnes and accompanies the part 8 application. The Dublin Childcare Committee was consulted which identified childcare providers within a 1 km radius. There are 10 no. facilities in operating in the area with a total capacity of 517 children. It was also found that there was no available spaces in the area to accommodate any demand generated from the proposed development.

Analysis of the potential demand generated from the proposed development has been undertaken in the accompanying Social Infrastructure Audit, which estimates an indicative demand of 10 spaces required to serve the proposed development. The audit has identified 5 no. childcare facilities permitted that will contribute additional childcare spaces in the study area. Notably, a concurrent Part 8 application at Basin View Flats forms part of the NDFA Social Housing Bundle 4&5, and this site includes the provision of a childcare facility that has been designed to accommodate c.40 children. The proposed creche at Basin View Flats is capable of accommodating demand from the surrounding area including this subject application. On this basis, the development is not of such scale that it would require the construction of a childcare facility and demand from the scheme can be accommodated at the Part 8 Basin View Flats development.

### 7.2.2 Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities (2007)

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 causal 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 the site. The site is currently used as the Dublin City Road Maintenance Depot. The redevelopment of the site to residential use will achieve an efficient reuse of finite land located within the city centre.

The proposed development has been designed to be cognisant of prevailing height and surrounding residential amenities. It will enhance the northern frontage of Forbes Lane and the eastern frontage of Marrowbone Lane which currently has a poor outlook with limited to no interaction with the street due to the high walls bounding the site. The proposed development is also cognisant of the site topography which slopes down toward the north in the direction of Forbes Lane. All areas of open space (public realm and communal) are well designed and sheltered from the road, allowing for safe enjoyment by users. The development will allow for activity on



the site, with increased pedestrian movements. It will give a more focussed aspect to the area, creating a sense of place and giving a heightened sense of security and safety to existing and prospective residents.

All units have been designed to meet the highest level of energy efficiency. The units will be constructed to a high degree of air tightness in compliance with building Regulations Part L. The development will use energy efficient technologies to reduce its reliance on fuel and electricity demand. 49 of the 108 apartments are single aspect. The proposed development underwent a daylight and sunlight assessment to ensure that appropriate levels of daylight and sunlight are provided to the units. It is reiterated that 29 (26.9%) of the units have been designed to universal design standards.

The proposed development will be delivered as part of a PPP. As outlined in the Building Lifecycle Report accompanying this Part 8, the appointed PPP company will deliver, maintain and manage the development. At planning stage *'consideration has been given to the external materials to buildings, boundaries, and the public realm, and also outline energy carbon reduction strategies. The materials and services proposed will be durable, and will provide a long life and low maintenance requirements for the residents.'*

All areas of open space, whether communal or public, have been designed to ensure their maximum use by residents.

### 7.2.3 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities which in turn replaced the Residential Density Guidelines issued in 1999. There is a focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

Table 3.1 – sets out Areas and Density Ranges Dublin and Cork City and Suburbs. It is a policy and objective of the Guidelines that residential densities in the range;

- 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork.
- 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.
- 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations.

The subject site is located within the city core of Dublin and within the canal corridor. The application site is located within walking and cycling distance to a wide array of services and amenities, including employment, recreation, cultural, education, commercial and retail uses. The site is also ideally located to high-quality public transport networks including the Luas Line, with the nearest Luas stop located at Fatima, and the numerous bus services and stops easily accessible to the site as well as the permitted upgrades under BusConnects. Having regard to the site's location, it can be considered the site's context aligns with the criteria of City – Centre where density shall generally range between 100-300 uph.

**Policy and Objective 3.1**

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

For the purpose of calculating the net density on site excludes the existing road network which is included in the red line due to road and junction improvements proposed. This results in a net site area of c. 0.53 ha and generates a net density of 203.8 uph. The proposed density accords with the recommended 100-300 uoh applied in the city centre of Dublin.

Section 5 of the Apartment Guidelines 2023 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 203.8 uph. The density is also aligned with the recommended density in the Dublin City Development Plan 2022-2028.

**Policy and Objective 4.1**

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

The principles approaches and standards of DMURS have been an integral part of the design process. This is detailed and assessed in the Quality Audit prepared by Roadplan accompanying this application.

Section 4.4 outlines 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.

**Policy and Objective 4.2**

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

Chapter 4.4 identifies the core principles of Quality Urban design and Placemaking, including Sustainable and Efficient Movement, Mix and Distribution of Uses, Green and Blue Infrastructure and Responsive Built Form that are required when creating places of high quality and distinct identity. Appendix D sets out a 'Design Checklist' which should be incorporated in new residential development as below.

A Design Statement responding to the 4 criteria above has been prepared and accompanies the documentation. The response to the criteria is summarised below.

**Table 2: Summary of Design Statement Response to the Specific Criteria**

No.	Topic	Response
<b>1</b>	<b>Sustainable and Efficient Movement</b>	
<b>(i)</b>	permeable and legible network of streets and spaces within the site	<p>The existing site is gated and secured by high boundary walls and fencing. The proposed scheme removes part of the solid perimeter boundaries in order to create active street frontage and public realm improvements to both Forbes Lane and Marrowbone Lane. In particular, the development is set back along Forbes Lane in order to facilitate the future active travel route between Thomas Street and Kilmainham.</p> <p>Vehicle access to the site is proposed from Marrowbone Lane, with pedestrian and cyclist access via Forbes Lane, which will also serve as emergency vehicle access. A new shared surface space is also provided within the site, creating a new permeable link from Forbes Lane to Marrowbone Lane. Retractable bollards will be utilised at the access point along Forbes Lane and within the scheme to restrict vehicle access.</p> <p>The proposed public realm improvements bounding the site will also positively contribute to the legibility of the street network. The site is located in the city centre and is proximate to multiple modes of public transport, including the Luas and Bus. The layout allows for pedestrian and cyclists priority within the site.</p>
<b>(ii)</b>	connections with and between established communities, services and other uses	<p>The proposed development site is located within an established urban neighbourhood of the Liberties. At present, the site is occupied by the DCC Roads Maintenance Depot. The site is located in the city centre with all the advantages and opportunities afforded for a city centre location. The proposal has sought to deliver a high quality residential development while also enhancing the community and amenity provision at the site to serve a range of uses and activities for members of the public and residents of the respective scheme.</p> <p>A social housing scheme is proposed in line with the site zoning and DCC objectives for the site. A community, culture and art space is provided at the ground floor of Forbes Lane and Marrowbone Lane. It is envisaged that this facility will provide a flexible and multi-functional space for residents and the surrounding community to utilise. The proposed space will be managed by the PPP co and a booking system will be in operation to facilitate meetings and activities as the needs arise.</p> <p>The site is located within walking and cycling distance to Thomas Street, James Street, Cork Street and Meath Street. A range of services and amenities are accessible to residents at these locations. In addition, the site is located insert from the city centre which includes a greater range of services and amenities to cater to the needs of residents. The SIA prepared by MacCabe Durney Barnes accompanies this application and also highlights the number of community facilities proximate to the site that can cater for a wide array of services and activities.</p>
<b>(iii)</b>	streets designed in accordance with DMURS	<p>In line with National Policy, the development objectives for the proposed site is to provide for higher-density infill development, in an urban location with good transport links. This helps to fulfil one of the primary objectives of DMURs, which is to encourage more sustainable travel, with pedestrians at</p>

No.	Topic	Response
		<p>the top of the user hierarchy, then cyclists, public transport and finally, private vehicles.</p> <p>The internal layout of the scheme has been designed to prioritise pedestrian and cyclist movement through the site, with vehicular movement confined to Marrowbone Lane and pedestrian and cyclist access also available along Forbes Lane. Proposed new streets and pavements within the scheme have been designed to be accessible for all users and abilities.</p> <p>Along Forbes Lane and Marrowbone Lane, the existing streets are quite narrow with substandard footpaths widths, as part of the proposal the building line has been set back and public realm works are proposed to improve the pedestrian facilities at the site. On addition, a number of traffic calming measures are proposed such as raised tables and new crossing points are proposed in order to prioritise pedestrian movement from and to the site.</p> <p>In addition, as part of the application a quality audit has been prepared by Roadplan which assesses the proposal in line with DMURS.</p>
<b>(iv)</b>	quantum of parking been minimised	<p>As per the Development Plan, the site is located within parking zone 1 due to its location within the canal cordon. Based on the objective to deliver general housing at the site the maximum car parking standards is 0.5 per dwelling. For the proposed development, with an analysis of particular need and on account of close proximity to public transport, a ratio of 0.01 is proposed. Further clarification here is presented in the Traffic and Mobility Management Plan that accompanies this planning application.</p> <p>A zero parking scheme is proposed due to the city centre location with immediate availability of multiple modes of high-quality public transport. The proposal includes 2 no. Part M visitor parking spaces and servicing and drop off area. The elimination of resident parking has enabled the delivery of a shared surface space within the site. Pedestrian and cycle access to all residences is provided by direct footpath access to buildings, communal open space, independent of the car parking area.</p> <p>Bicycle stores are in the form of secure indoor rooms within the ground floor of the main building envelope with good lighting and secure access, directly from the communal open space. Visitor bicycle parking in the public realm is well overlooked from apartments above.</p>
<b>2</b>	<b>Mix of Land Uses (Vibrant Centres and Communities)</b>	
<b>(i)</b>	mix and intensity of land uses appropriate to the site	<p>The primary brief for the site is derived from the DCCDP, and the SDRA mapping for the SDRA 15. This expressly identified that the site is to be redeveloped. Furthermore, the Development Plan zoning maps further define the area of the site to be used for Sustainable Residential Neighbourhoods (Z1). The Development Plan also indicated that the density of a SDRA should range from 100-250 uph. Given the location of the site, within a SDRA the 5% provision for community, arts and culture use is applicable to the site.</p> <p>The subject proposal is therefore deemed appropriate, as it meets the requirements of the SDRA.</p>
<b>(ii)</b>	diverse and varied range of housing types	<p>The proposed development is to provide general needs housing. The area is dominated by private housing with over 72% either rented or owned</p>

No.	Topic	Response
		<p>according to the 2022 census of population. Just 19% of the housing stock consist of housing rented either from the local authority or from a voluntary body. With the provision of 108 units, the share of social housing in the overall stock in the area would rise from c.19% to c.20%. The resultant mix of housing types is based on the housing waiting list of the area and the proposed 1,2 and 3 bed apartments provides for those needs.</p> <p>Furthermore, in compliance with DCCDP, in excess of 25% of the apartments have been designed in accordance with Universal Design Principles.</p>
(iii)	support the regeneration and revitalisation of an existing centre or neighbourhood	<p>The site is located with Strategic Development and Regeneration Area No. 15 as identified in the Dublin City Council Development Plan. SDRA 15 identifies that site for redevelopment. The existing depot use results in a number of regular high vehicle goods (HGVs) trips to and from the sites. Its industrial use is at odds with the surrounding urban location within a residential and mixed use neighbourhood. The proposed scheme will replace the depot with a housing scheme that will revitalise this part of the Liberties area.</p>
(iv)	enhancement of the public realm	<p>The main public realm contribution will be the significant, widening, greening and resurfacing works proposed to Forbes Lane and Marrowbone Lane. A civic plaza area with raised planters and seating areas is proposed in front of the community, culture and arts spaces and it is intended that it will also act as a type of forecourt and arrival area adjacent to the existing St Catherine’s Community Centre. In addition, the new permeability link between Forbes Lane and Marrowbone Lane will facilitate pedestrian and cyclist movement.</p>
<b>3</b>	<b>Green and Blue Infrastructure (Open Space, Landscape and Heritage)</b>	
(i)	positively responded to natural features & landscape character	<p>The site is a brownfield site, currently covered in single storey sheds and cabins with concrete and tarmac hardstanding. There is no soft landscaping of natural features within the depot site. a strategy for biodiversity improvement is proposed, proposals for which have been developed by the wider design team, with particular input from our consultant arborist, ecologist and landscape architect. The subject development proposes a net biodiversity gain.</p> <p>The Part 8 site is located within a zone of archaeological interest. The site does not contain any structure either listed on the Record of Protected Structure or the NIAH. In addition, no National Monument has been identified at the site. As part of the application, a Preliminary Architectural Heritage Assessment has been prepared.</p> <p>While the proposed development site occupies a large part of a large and important 19th century whiskey distillery, virtually all traces of that large industrial complex have been totally erased from the site. The only tangible links to the distillery are the fragmentary sections of former external building walls that now form parts of the external boundary walls along Marrowbone Lane and Forbes Lane. The proposal will retain and modify the east elevation of the former gate house on Marrowbone Lane, and a portion of the rubble stone walls along Forbes Lane.</p> <p>The southern site boundary interacts with an existing residential site boundary. A high wall marks the site limit. The proposed boundary treatment will allow for a cladding of the wall. The stones used for the cladding will come</p>

No.	Topic	Response
		<p>from the existing boundary wall that will be dismantled and repurposed for the boundary integration.</p>
<b>(ii)</b>	<p>a complementary and interconnected range of open spaces, corridors and planted/landscaped areas</p>	<p>The application site is infill in nature and located in the inner-city centre. It is acknowledged that there is a lack of quality landscaping and green corridors currently within the immediate vicinity of the site. The proposed scheme endeavours to redress the balance providing pockets of green spaces and greening to public areas. The areas of intensive green roof will also create a new roof top landscape type for this locality.</p> <p>The proposed communal and private open space is defined by the placement of the built form at the site, the communal open space is located in the courtyards of the proposed Block A and B.</p> <p>The proposed landscaping strategy at the site will complement and enhance the existing green infrastructure network of the Liberties area. The proposed high quality open spaces and multi-functional space is visually attractive and provides multiple recreational opportunities, while also being a source of sense of place and identity for all. The proposed development will positively contribute to meeting the vision and objectives of the Liberties Greening Strategy.</p>
<b>(iii)</b>	<p>public open spaces universally accessible and designed to cater for a range of active and passive recreational uses</p>	<p>The scheme is located on a sloping site and every effort has been made to design the streets and open spaces for ease of access for all. A relatively flat communal courtyard is provided in the centre of the development incorporating in a children’s play area, seating and informal mounding. The proposed communal open space will also benefit from passive surveillance of Block A and B. The proposed public realm improvement along Marrowbone and Forbes Lane will also provide passive recreational space for users.</p>
<b>(iv)</b>	<p>integrated nature-based solutions for the management of urban drainage</p>	<p>The proposed development will be designed in accordance with the principles of Sustainable Drainage Systems (SuDS) as embodied in the recommendations of the Greater Dublin Strategic Drainage Study (GDSDS) and will significantly reduce run-off rates and improve storm water quality discharging to the public storm water system. A wide range of SuDS measures are proposed across the site to maximise interception and treatment, which are detailed in the Engineering Report prepared by Malone O’Regan and submitted under separate cover.</p> <p>The design features extensive active SUDs measures, including tree pits, green and blue roofs, and permeable paving. Interception storage is proposed through a combination of the blue roofs and the permeable paving solution, and a stone storage area. Surface water runoff from new internal road surfaces, footpaths, other areas of hardstanding and the roofs of buildings will be collected within a gravity drainage network and directed towards an attenuation storage system. The attenuation storage is sized to cater for a 1 in 100-year storm event. Further details of the principal SuDS features proposed for this development are provided in the Engineering Report prepared by Malone O’Regan.</p>
<b>4</b>	<b>Responsive Built Form</b>	
<b>(i)</b>	<p>coherent and legible urban structure in</p>	<p>The SDRA guiding principles and the zoning applicable at the site were key to achieving a coherent and legible urban structure while also responding to the existing context, height scale and massing surrounding the site. The</p>

No.	Topic	Response
	<p>terms of block layouts and building heights</p>	<p>subject proposal also aims to have sufficient variety in building height as an important component in helping to achieve a sense of place and create an attractive built environment, all whilst protecting existing residential amenity. When sufficient variety in building height and form is not achieved, in certain cases streets can become placeless and difficult to orientate. The minimum density requirement of 100 dph determined by the sites location within a SDRA must also be achieved.</p> <p>The SDRA suggests base heights of 6 to 8 storeys, with potential for an opportunity to deliver a locally higher building at the site. However, the proposed heights range from 5 to 7 storeys due to the infill nature of the site and consideration has been given to the existing surrounding properties while also trying to maximise the potential for development on the site while also achieving compliance with the provisions of the Development Plan. Two 'L shaped' blocks are proposed which generally reprise the built form of the SDRA indicative built form of the site.</p> <p>The view from the north east has always been identified as a key vista as the existing street network turns down Marrowbone Lane. A strong corner is proposed announcing the block and establishing the scale of the development. Elsewhere building height and orientation is adjusted to respond to the daylight and sunlight analysis, and to maximise amenity, proportion massing, and to identify building access points. The overall building structure will deliver a legible and coherent built form and pedestrian environment at the site.</p>
<p>(ii)</p>	<p>buildings address streets and spaces</p>	<p>The site is currently bound by existing boundary walls, and as part of the proposed development it is intended to demolish the existing wall and set back the building line and deliver a new active urban edge along Forbes Lane and Marrowbone Lane. The proposed set back of the building line, will facilitate an active travel route proposed under a separate application and works contract and the widening of Marrowbone Lane will improve the pedestrian environment and the greening improvements along the boundary of the site.</p> <p>At ground floor level, the public sides of buildings is presented to the street, entrances doors to each stair core, and own door approaches with private front curtilages to ground floor apartments where relevant. Any ground floor windows are set back from the street, and include either generous privacy strips or privacy entrance curtilages. A defensible zone of soft planting is maintained around the building creating a clear buffer between public and private areas. Raised planters in a red concrete material are used to facilitate level changes and provide areas of seating to the public spaces.</p> <p>The rear of Block A and B overlook the proposed communal open space. All publicly accessible spaces, including streets are overlooked by multiple apartment windows, balconies, creating multiple opportunities for passive surveillance.</p> <p>The proposed communal open space is not overshadowed by either existing or proposed buildings. Therefore, the space enjoys direct access to sunlight to ensure that it is bright and attractive during the day, maximising the potential for it to be well used.</p>



No.	Topic	Response
(iii)	layout, scale and design features of new development respond to prevailing development patterns (where relevant)	<p>Much consideration has been given to the design and layout of the scheme, with a particular focus on providing high-quality residential development, creating a sense of place for residents whilst also integrating into the existing built environment. The layout is particularly derived by the SDRA guiding principles of the site. The site currently has no active street frontage on Forbes Lane and Marrowbone Lane.</p> <p>The Dublin 8 area has experienced significant growth in recent years with numerous large scale housing development granted in the Dublin 8 area in recent years, the wider area of the site is undergoing significant regeneration and densification of underutilised sites that should see a corresponding increase in local population that will support local services and facilities.</p> <p>The SDRA 15 states that the building heights of 6-8 storeys should be generally acceptable for new development. A scheme of 5-7 storey is proposed. A detailed Sunlight and Daylight analysis has been prepared to demonstrate how the proposal has been developed to respond to the existing amenity of the surrounding buildings. The Liberties area has a distinct character of narrow streets and locally higher buildings deriving from its medieval street network and industrial building heritage. The proposed scheme aims to maintain some of the historic character narrow urban grain character while also ensuring that the buildings set back, heights and separation distances result in a high-quality residential proposal.</p>
(iv)	coherent architectural and urban design strategy	<p>A coherent architectural design strategy has been delivered, which will bring benefits to the social sustainability of the local area.</p> <p>Architecturally, the development will present an appropriate and distinctive urban form to Marrowbone and Forbes Lane. It will offer an improvement to the street enclosure and active street frontage at the site, passive surveillance of and urban form across the site whilst maintaining the daylight and sunlight amenity of existing properties.</p> <p>A common design language is threaded through each of the elements of the proposed development, but separately each element has sufficient variety in height, finishes and articulation to assist in forming a sense of place, ensure local distinctiveness, and to aid orientation.</p>

Section 28 of the Planning and Development Act 2000 (as amended) provides that planning authorities and An Bord Pleanála shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines. 4 no. SPPRs are included which are addressed in the following table.

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	<p><b>Separation Distances</b></p> <p>When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses,</p>	<p>The proposed development does not give rise to any separation distance between opposing windows of less than 16m.</p>

SPPR No.	Summary	Development Compliance
	<p>duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p>	
<p><b>SPPR 3</b></p>	<p><b>Minimum Private Open Space Standards for Houses</b></p> <p>Proposals for new houses meet the following minimum private open space standards: 1 bed house 20 sq.m; 2 bed house 30 sq.m; 3 bed house 40 sq.m; 4 bed + house 50 sq.m</p>	<p>Apartment units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).</p>
<p><b>SPPR 3</b></p>	<p><b>Car Parking</b></p> <p>In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling</p>	<p>A total of 2 no. car parking spaces have been proposed. Owing to the site's location and proximity to existing and proposed high-quality transport, the proposed car parking provision is considered appropriate.</p>
<p><b>SPPR 4</b></p>	<p><b>Cycle Parking and Storage</b></p> <p>Safe and secure cycle storage facilities to meet the needs of residents and visitors. A general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided.</p>	<p>A total of 219 no. cycle parking spaces are provided (165 no. long stay and 54 no. short stay). This is accordance with the Dublin City Development Plan standards and is appropriate to meet the needs of residents and visitors for the profile of this future resident community and community, arts and cultural use.</p>

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

*The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.*

*Different minimum requirements (within the 10-15% range) may be set for different areas..... in some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority*

*might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity.*

Due to the infill nature of the site, there is limited opportunities for dedicated public open space at the site. However, as part of the proposed development it is intended to deliver a civic space along Forbes Lane and Marrowbone Lane. The proposed space will complement the new building frontage along Forbes and Marrowbone Lane as well as the planned active travel network along both streets. The space will be multi-functional in nature and include high-quality landscaping features. As part of the proposed development, a 700 sqm communal open space has been proposed and this is located in the courtyard between Block A and B.

The site is proximate to Marrowbone Lane Depot where under GIO56 of the Development Plan it is an objective of the Council to develop the council owned depot at Marrowbone Lane as a green infrastructure and recreational area. The delivery of this amenity will greatly contribute to the public open space available in this area, particularly to perspective residents residing at this subject development.

#### 7.2.4 Design Manual for Urban Roads and Streets (DMURS) (2019)

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.

Marrowbone Lane is identified as a core pedestrian spine, while Forbes Lane has been identified as part of a proposed cycleway route. The site is well connected and located to existing public transport and active travel networks. The proposed scheme consists of the widening and upgrading to the public realm on Forbes Lane and Marrowbone Lane, which will positively contribute to the pedestrian environment.

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. The proposed internal shared surface will prioritise pedestrian and cyclist movement within the scheme.

A Stage 1 Quality Audit has been prepared in respect of the proposed development which incorporates a DMURS Street Design Audit and Audits of Accessibility, Cycling, Walking and Road Safety. The Audit has made key suggestions in relation to DMURS compliance, and these suggestions have been incorporated into the design proposal for the Part 8 site. The proposed development has been designed in accordance with DMURS, please refer to the accompanying Transport and Mobility Management Plan and road drawing prepared by Malone O'Regan.

#### 7.2.5 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)

The key relevant Specific Planning Policy Requirements (SPPR) are summarised in the table below.

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	Mix of units to include: - Up to 50% one-bed or studio type units; - No more that 20-25% of the total proposed development as studios;	The proposed development includes 108 units, of which 64 are 1-bed (59%), 31 are 2-bed (29%) and 13 are 3-bed (12%).

SPPR No.	Summary	Development Compliance
	<p>- No minimum requirements for 3-bed.</p> <p>CDP may specify a mix for apartments subject to a Housing Need and Demand Assessment.</p>	<p>The site forms part the 'Dublin 8' area which is subject to one of the sub-City HNDA in the Dublin City Development Plan 2022-2028. Each multi-unit residential development shall contain:</p> <ul style="list-style-type: none"> <li>• A minimum of 15% three or more bedroom units</li> <li>• A maximum of 25-30% one bedroom/ studio units.</li> </ul> <p>However, following the exemptions outlined in Table 37 of the Housing Strategy Appendix 1 of the Development Plan, Council Part 8 residential schemes may propose a different mix having regard to the specific needs of the Housing &amp; Community Services Department. As part of the design process, the Housing &amp; Community Services Department of DCC have guided the unit mix requirements in the area as informed by the Housing Waiting List for Area L. Section 4.2 of this report, has identified a strong need for one-bed units. On this basis, the proposed development complies.</p>
<p><b>SPPR 3</b></p>	<p>Minimum Apartment Floor Areas</p> <ul style="list-style-type: none"> <li>• Studio apartment (1 person) - 37 sq.m</li> <li>• 2-bedroom apartment (3 persons) 63 sq.m</li> <li>• 2-bedroom apartment (4 persons) 73 sqm</li> <li>• 3-bedroom apartment (5 persons) 90 sq.m</li> </ul> <p>The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard, by a minimum of 10%</p>	<p>Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) and which demonstrates compliance.</p> <p>All units meet the floor area requirement.</p> <p>HQA sets out in table format the floor area of each apartment and the compliance with the Guideline</p>
<p><b>SPPR 4</b></p>	<p>Dual Aspect</p> <p>(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.</p>	<p>59 apartment are dual aspect. This equates to 55% of units.</p>

SPPR No.	Summary	Development Compliance
	(ii) (ii) and (iii) do not apply.	
<b>SPPR 5</b>	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 are consistent with SPPR5 of the Apartment Guidelines. The proposed floor to ceiling height is in accordance with this specific policy.
<b>SPPR 6</b>	Apartments per core A maximum of 12 apartments per floor per core may be provided in apartment schemes.	The proposed development complies with SPPR6. A maximum of 6 apartments per core proposed.

***Non-specific policy in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023)***

A number of non-specific standards are provided in the Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2023) (Apartment Guidelines 2023) which are outlined below and compliance thereto. This section should be read in conjunction with the Architect’s Housing Quality Assessment (HQA).

***Minimum Quantitative Standards***

Appendix I of the Design Standards for New Apartments - Guidelines for Planning Authorities (2023) sets out minimum quantitative standards for bedroom floor areas, storage space, communal amenity space and private amenity space. Please refer to the HQA and the floor plans of each of floor which demonstrate the bedroom and other rooms sizes.

***Private Open Space***

All units have been provided either with private balconies or ground floor terraces. All private amenity spaces meet or exceed the required minimum floor area requirements set out in Appendix 1 of the apartment guidelines.

***Communal Open Space***

Appendix 1 of the Design Standards for New Apartments sets out minimum requirements for communal open space. In relation to communal amenity space, the minimum requirement to be met is set out below:

***Table 3: Minimum Requirements for communal amenity space***

Unit types	Sqm required	No. of Units	Total required (Sqm)
1-bed	5	64	320
2-bed (3 persons)	6	2	12
2-bed (4 persons)	7	29	203
3-bed	9	13	117
Total		108	652

The proposal includes c. 700 sqm of communal open space. The proposed development therefore exceeds the standard requirement.

### **Size in excess of ten percent floor area**

Section 3.8 (a) of the Design Standards for New Apartments – Guidelines for Planning Authorities provide 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 HQA demonstrates compliance with section 3.8 of the Apartment Guidelines as the majority of all apartments exceed the minimum floor area standard for any combination of the unit types by a minimum of 10%.

### **Play areas**

The Apartment Guidelines 2023 indicate minimum requirements for play areas of schemes of a certain size. The proposed development includes 64 no. 1- bed units, 31 no. 2-bed and 13 no. 3-bed. It therefore gives rise to the need to provide 85-100 sqm for a small play area but does not give rise to the need to provide a play area for older children as the number of 2+ bed units totals 44 units. A play area is provided within the communal open space area. The central area will provide playful seating and hut, usable by all group age, and a south-facing mound.

### **Cycle Provision**

Design Standards for New Apartments – Guidelines for Planning Authorities provide for 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. Given the proposed housing mix, the guidelines would therefore require the provision of 162 long-stay spaces to serve the development.

165 long-stay cycle parking spaces are provided. These are sheltered and located in three secure stores inside the building. The storage areas are accessible from the internal courtyard which is closed to non-residents by a gate. This is also in excess of the CDP apartment standards of 1 space per unit.

In relation to short stay cycle parking, the guidelines would give rise to a requirement of 54 spaces. The proposed development includes 54 spaces and therefore meets the requirement.

It is important to note here that the cycle parking provision in the Apartment Guidelines 2023 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 given the proposed community, arts and cultural spaces proposed.

### **Car Parking**

The Design Standards for New Apartments - Guidelines for Planning Authorities 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 reduced and minimised parking standards.



The site proposed for development under this Part 8 application would qualify as one such central/and or accessible urban location. The site is in the City Centre and is in close proximity to numerous bus services and the Luas.

2 no. car parking spaces are provided within the site, which equates to a car parking ratio of 0.01. Having regard to the infill nature of development and site's location within the city centre, it is considered appropriate to wholly reduce the parking standards applied at the site to ensure an appropriate level of parking is provided to serve the development owing to its accessibility to active travel and public transport networks.

On-site car parking is considered to be an inefficient use of space, particularly at a constrained location in a highly developed urban area such as the development site. Taking this into consideration, significantly reduced car parking spaces is considered a more sustainable alternative which can both reduce the need for car ownership and provision of dedicated car parking. As part of the Traffic Mobility Management Plan, a number of mobility management measures have been proposed that can be implemented once the site is occupied.

### **Content of Planning Applications**

*The Design Standards for New Apartments - Guidelines for Planning Authorities* require that certain documents be prepared.

1. A Housing Quality Assessment (HQA) accompanies this part 8 application. It includes compliance with the 10% additional space compliance and details of proposed private amenity, storage space and aspect. A HQA has been prepared and submitted as part of the application.
2. A daylight and sunlight analysis report by Digital Dimensions is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of BR209:2022 Site Layout Planning for Daylight and Sunlight (Third edition), also referred to as the BRE guidelines, BS EN 17037:2018+A1:2021 Daylight in Buildings, also referred to as the UK Annex. and IS EN 17037:2018 Daylight in Buildings. Please refer to the report prepared by Digital Dimensions for a comprehensive overview of the results, A summary of the results is outlined below:

#### **Daylight to Adjacent Properties**

The majority of the window the neighbouring residential properties retain a VSC level greater than 27% or if less than 27% VSC then they are not reduced below 80% of their existing value. There are a small number of windows that have a reduction below 27% VSC. The guidelines sets out alternative target VSC levels for these conditions and the majority of windows achieve the alternative target VSC levels. Any reduction in available daylight is in-line with emerging trends in the area and any impact will be negligible. In considering the acceptability of the results / level of impact, it must be acknowledged that the proposed development is located on a small infill site where it would be impossible to avoid a level of perceptible impact on neighbouring properties, without severely limiting the height of development on the application site, and prejudicing the possibility and viability of its redevelopment.

#### **Sunlight to Adjacent Properties**

There will be minimal reduction to the available sunlight to the neighbouring properties and any impact will be minor to imperceptible. There will be no reduction to sunlight to existing adjacent private amenity spaces and any perceived reduction will be negligible.

#### **Assessment of Daylight in Accordance with BR209:2022 and BS EN 17037:2018+A1:2021**

100% of the Living, Dining, Kitchen and Bedroom spaces within the proposed development achieve the target values set out in BS EN 17037:2018+A1:2021 section NA1. These are the minimum values, per specified use, to be achieved in habitable rooms and meets the recommendations of the BRE guidelines.

**Sunlight within the Proposed Development**

This scheme is well designed for sunlight, with 85.2% of units meeting the minimum recommended 1.5 direct sunlight hours. This is in line with the BRE guidelines example for an apartment layout where 4 in 5 achieves the target sunlight hours. 4 All public and communal amenity areas meet and exceed the recommendations of the BRE guidelines, achieving sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st March.

- 3. A building lifecycle report accompanies this application. The report addressed management and energy efficiency.

**7.2.6 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. The Dublin City Development Plan 2022-2028 reflects the content of these guidelines.

Section 1.10 requires Development Plans and Local Area Plans to support a least 6 storeys at street level in town centre areas along with scope for greater height, subject to meeting performance based criteria. Standard Building height is considered 6-8 storeys.

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 2022-2028 applies to the subject site. The proposed development provides for a range of height from 5 to 7 storey, which is modest having considered the surrounding area and within the permissible envelopes of the Dublin City Development Plan. In any event, the key relevant Specific Planning Policy Requirements (SPPRs) are summarised and responded to below:

**Table 4: SPPRs of Urban Building Heights – Guidelines for Planning Authorities**

SPPR	Summary	Application of Consistency
SPPR 1	Planning Authorities are responsible for identifying appropriate locations for building heights in their statutory plans and that no blanket 'numerical' height shall be applied.	This is the responsibility of Dublin City Council. There is no blanket numerical height applicable for the subject site. The proposed development is located within SDRA 15 Liberties and Newmarket Square which advises that base heights should range from 6 to 8 storeys and under the indicative built form for the site, it is also suggested that there may be an opportunity to deliver a locally higher building to the north west corner of the site.

SPPR	Summary	Application of Consistency
SPPR 2	In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy.	<p>This is the responsibility of the Planning Authority. The site is zoned Z1 'Sustainable Residential Neighbourhoods' under the Development Plan and capable of catering for the proposed community, arts and cultural spaces.</p> <p>Thus, the proposed development provides for the appropriate urban development of the area, to deliver compact growth on an existing brownfield site.</p>
SPPR 3	Development Management Criteria are set out. Where an applicant sets out how a development proposal complies with the criteria and the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and these guidelines the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise In planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:	<p>The proposed development ranges in heights between 5-7 storeys in height. Having regard to the prevailing urban context of the site, the proposed height is considered to be an appropriate scale to achieve the required density on the site and deliver compact growth on this brownfield infill site.</p> <p>Table 5 below outlines how the proposed development complies with the development management criteria listed in section 3 of the guidance.</p>
SPPR 4	Not applicable	Not applicable as this SPPR refers to greenfield or edge of city/ town locations.

Development management criteria are set out under section 3 of the Guidelines. These are addressed in the table hereafter. It is noted that there is no applicable height cap in either the City Development Plan which would preclude such height on the application site.

**Table 5: Development Management Criteria**

Scale	Criteria	Response
City/ Town	The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The proposed development is located within the city centre, proximate to high-quality public transport networks including the Luas line and Bus services. The site is located c. 340 metres to the east of the Fatima Luas stop. This gives convenient access to the Luas red line connecting Tallaght to the Point. The site is approximately 500 metres to the south of James Street where the James Street bus stop no. 1996 and the Stevens Lane bus stop no. 1941 are located. These bus stops are served by the G1, G2, 13 and 123 bus routes.

Scale	Criteria	Response
		<p>The site is also located c. 900m from Heuston Station which also provides frequent public transport services for travel between Dublin to the south, southwest and west of Ireland.</p> <p>In addition, as part of the BusConnects programme will result in the subject site having access to buses travelling at a frequency of 15 minutes intervals during the weekdays from the James’s Street to the north with the G spine bus routes, with these services now operational. The site also has access to the D spine routes located on Cork Street to the south of the site, and this spine will consist of 5 bus routes. The site will also benefit from the proposed Kilmainham to Thomas Street cycle route which will be facilitated along Forbes Lane.</p> <p>A key priority of the Development Plan is to create sustainable neighbourhoods, with a range of households types and tenures located in close proximity to community facilities and services in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. The subject site is ideally situated in close proximity to existing amenities and services to realise this ambition.</p>
	<p>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.</p>	<p>The proposed development is not located in an architecturally sensitive area. It proposes a height of up to 7 storeys. The site is currently in use as the DCC Road Maintenance Depot within an established urban centre of the Liberties. The redevelopment of the site for residential use will enable the efficient use of residentially zoned land capable of delivering compact growth. The proposed development is of modest scale and set back from Forbes and Marrowbone Lane, well within permissible heights envisaged by the Dublin City Development Plan, specifically the SDRA and would not warrant a landscape and visual assessment. However, a series of verified photomontages and CGIs of the proposed development viewed from various angles have been submitted as part of the application.</p>
	<p>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</p>	<p>The gross site is c. 0.58 ha and of relatively modest scale. The proposed building line has been set back from Forbes Lane and Marrowbone Lane to facilitate the delivery of an active travel route along Forbes Lane and Marrowbone Lane. The proposed massing and block forms have been utilised to achieve a scale of development that meets the required density on the site. The surrounding scale of development</p>

Scale	Criteria	Response
	<p>to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>adjoining the site varies considerably. The proposed development responds to the prevailing context while also achieving the required density of a site located within a SDRA and in proximity to existing, permitted and proposed high-quality public transport.</p>
<p>District/ neighbourhood/ street</p>	<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</p>	<p>The part 8 site is in use as the DCC Road Maintenance Depot. The site is itself paved with concrete and used for the storage of vehicles and materials. There are some pre-fabricated administration buildings in the north of the site and a range of sheds used for the storage of materials and porta-cabins used by staff.</p> <p>As part of the design to commemorate the site's heritage, it is proposed to retain and modify a portion of the northern boundary wall along Forbes Lane and east elevation of the former gate house along Marrowbone Lane. The proposed retention and modification of these structures has been incorporated into the streetscape and landscaping strategy at the site. Part of the existing boundary stone wall will be preserved and integrated into the 450mm high planter along Marrowbone and Forbes Lane.</p> <p>The proposed development has endeavoured to retain the existing residential amenity of the area while also enabling the delivery of an infill development. The development has also been set back from Forbes Lane and Marrowbone Lane to facilitate public realm improvements and the facilitation of an active travel route along Forbes Lane.</p> <p>It is strongly considered that the proposed development responds to the natural and built environment with a high-quality scheme that will positively contribute to the urban neighbourhood.</p>
	<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>The proposed development will deliver a new urban edge and active street frontage along Forbes Lane and Marrowbone Lane. The block orientation addresses the existing and proposed internal road layout.</p> <p>No uninterrupted walls of building are proposed. All corners are turned with passive surveillance provided onto the street and the proposed communal open space.</p>

Scale	Criteria	Response
		<p>A traditional red brick field material with off-white mortar colour is proposed as a gentle nod to the historic industrial buildings in the area that were built in brick with lime mortar. Variety is provided via red concrete detailing and contrasting charcoal window frames and balcony finishes. Please refer to the Architecture Design Statement for further details on materials. The selected materials allows for robustness while also aligning with prevalent materials used in the area.</p>
	<p>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).</p>	<p>The proposed development will enhance the urban design context at the site. The site is currently occupied by the DCC Roads Maintenance depot that is due to be relocated prior to the commencement of development.</p> <p>The development will provide a new residential development proximate to existing amenities and services. The proposed development will provide a greater sense of scale and enclosure to the street owing to the varying heights surrounding the site. The high-quality proposal will provide an improved streetscape and improve the public realm space and community space offering in the area. The proposal will also create a human scale between the landscaped and built areas of the site, allowing for passive surveillance.</p> <p>A Desktop Flood Risk Assessment has been undertaken for the proposed development. The development will not give rise to flood risk issues within the site or outside the site.</p>
	<p>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.</p>	<p>The site's current use is at odds with the surrounding uses adjoining the site. The high walls and lack of any active street frontage at the site create an unpleasant pedestrian environment. The proposal includes the provision of a new vehicular access point on Marrowbone Lane, with pedestrian and cyclist access also proposed via Forbes Lane while also delivering a cohesive residential development with community, arts and cultural space with public realm improvements which will positively integrate with the adjoining uses. The new pedestrian and cycle link through the site will improve the legibility and connectivity between the site and the surrounding are.</p>
	<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The Part 8 application comprises 108 apartment units (64 no. 1 bed, 31 no. 2 bed and 13 no. 3 bed). The housing mix for the site is derived from the housing waiting list for area L, which shows strong demand for one-bed units, with 80% of the list</p>



Scale	Criteria	Response
		<p>requiring a one-bed unit. Similar observations are made in relation to the transfer list, with 53% of the list seeking a one-bed unit. In this regard, the proposed development will positively respond to housing need in the area and help alleviate demand in the area.</p>
<p>Site/building</p>	<p>The form, massing and height of proposed development should be carefully modulated so as to maximise access to natural daylight ventilation and views and minimise overshadowing and loss of light.</p>	<p>A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.</p> <p>The Design Statement sets out in detail the design rationale of the scheme. The majority of apartment are dual aspects. All apartments have been designed to include generous storage provision.</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 sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.</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>We refer to the enclosed Sunlight &amp; Daylight report. The proposal meets all the requirements. No compensatory measures are required.</p>
<p>Specific Assessment</p>	<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-</p>	<p>Micro-climate effects relate to tall buildings where wind can be accelerated either through narrow channels between these structures or, from being accelerated downward towards the ground through downdraft effect.</p>

Scale	Criteria	Response
	<p>climatic effects where taller buildings are clustered.</p>	<p>A Wind Micro-Climature Modelling Study has been undertaken by B-Fluid and accompanies this application. The study concludes:</p> <p><i>“Therefore, the CFD study carried out has shown that under the assumed wind conditions typically occurring within Dublin for the past 15 years:</i></p> <p><i>The development is designed to be a high-quality environment for the scope of use intended of each areas/ building (ie. Comfortable and pleasant for potential pedestrian)</i></p> <p><i>The development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads.”</i></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 AA Screening has been prepared by NM Ecology and is enclosed with this submission. The AA Screening concludes that there is no risk to Natura 2000 interest identified. A preliminary Ecological Appraisal also includes an assessment of the potential impacts to nesting birds and a bat survey has also been prepared by NM Ecology and has been used to inform the preparation of a Preliminary Ecological Appraisal.</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. There will be no impact to local telecommunications as part of the proposed development.</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>A Design Statement has been prepared by MCORM Architects and Urban Design and is enclosed with this application. An overview of the site’s historic built environment is provided within the Design Statement. In addition, owing to the site’s historic context, a Preliminary Architectural Heritage Assessment has been prepared by Mesh Architects. This report includes an historical background, appraisal and photographic record of existing structures and impact assessment of the proposed development.</p>
	<p>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate</p>	<p>An AA Screening has been prepared by NM Ecology and accompanies this application.</p> <p>An EIA Screening has been prepared and is enclosed with this application. The conclusions of these reports are summarised in this report. SEA does not apply.</p>

## 7.3 Regional Policy

### 7.3.1 Regional and Spatial Economic Strategy (RSES) for the Eastern and Midlands Region 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.

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 development complies with the principles of the RSES. It will support the consolidation of the urban fabric and is located on an infill site. It also a number of community facilities and is within walking distance of services and public transport.

## 7.4 Local Policy

### 7.4.1 Dublin City Development Plan 2022-2028

#### **Strategic Objectives**

The Dublin City Development Plan (CDP) 2022-2028 is articulated around a number of strategic principles to support a sustainable approach to the development of the city. Under the social/residential principles, the plan seeks to create a more compact city with a network of sustainable neighbourhoods, modelled on the principles of the 15 minute city. This is underpinned by the provision of a range of facilities, choice of tenure and house types to promote social inclusion and integration of all ethnic / minority communities. It also seeks to create a *'connected, legible and liveable city with a distinctive sense of place, based on active streets, quality public spaces and adequate community and civic infrastructure'* under the Urban Form Principle.

The Core Strategy and Settlement Hierarchy of the Dublin City Development Plan outlined in Table 2-8 of the Development Plan presents the spatial structure and proposed residential yield in the various areas of the City. The site is located in the Liberties & Newmarket Square Strategic Development Regeneration Area 15 where the character and general density applied would be mixed use with a planned residential yield of 2,500 units and an estimated population of 5,000 persons.

Under CS07 *'Promote Delivery of Residential Development and Compact Growth'*, the Council seeks *'To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure,*

*including the SDRAs, vacant sites and underutilised areas.* The proposed development is fully aligned with CSO7 as the site is an underutilised infill site with a city centre zoning. The site will allow the consolidation of the urban fabric in the area. Under CSO 10, it supports the development of brownfield, vacant and regeneration sites, such as the subject site.

### **Zoning**

The Dublin City Development Plan (CDP) 2022-2028 zones the lands Z1 'Sustainable Residential Neighbourhoods' which objective is *'to protect, provide and improve residential amenities'*. The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city.

Permissible uses include inter alia community facilities, as well as residential, cultural and recreational buildings and uses.

The proposed development includes community, arts and cultural space and residential units at ground floor level. The upper floors will be residential units. The development complies with the zoning and all uses proposed are permissible.



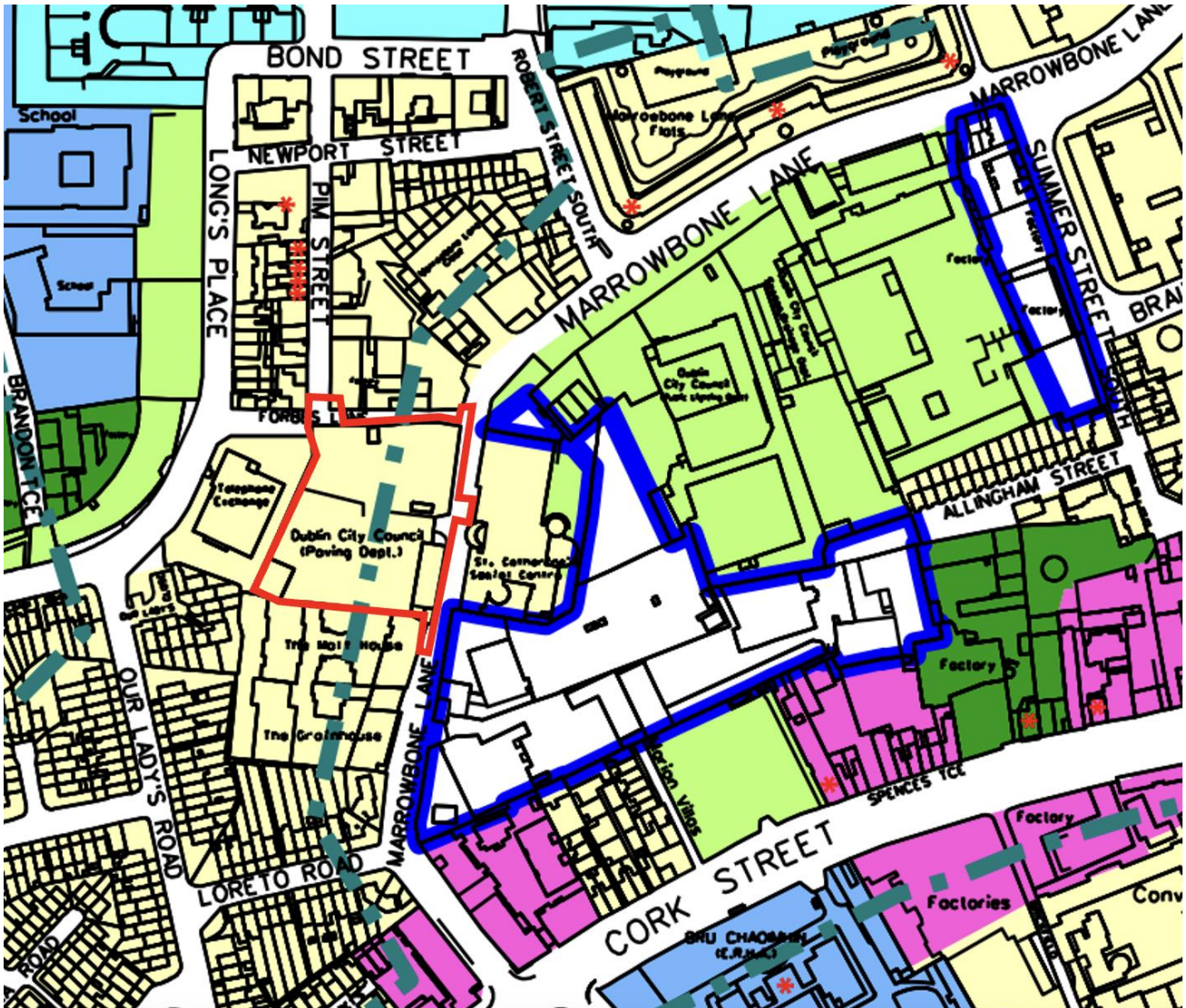


Figure 12: Extract from the DCC CDP Land Use Zoning Map (Source: DCC)

**Strategic Development and Regeneration Area**

The site is located in the Liberties and Newmarket Square Strategic Development Regeneration Area (SDRA) 15. The CDP sets out site specific guiding principles for each SDRA as well as sets out objectives common to all of them. Response to the objectives is provided in the table below.

Objective SDRA01	Development Response
To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:	
<b>Architectural Design and Urban Design:</b> All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in	The proposal is of high architectural quality and adheres to architectural and urban design principles. It is aligned with the principles of the 15-minute city.

Objective SDRAO1	Development Response
<p>Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city.</p>	
<p><b>Phasing:</b> Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.</p>	<p>The proposed development will be delivered in one phase, which includes communal open space areas and the community, arts and cultural facility.</p>
<p><b>Access and Permeability:</b> Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.</p>	<p>The proposed development is an infill development site. The removal of the existing boundary wall fronting Forbes Lane and Marrowbone Lane will achieve an active street frontage and the subsequent widening of Forbes Lane to facilitate an active travel route.</p>
<p><b>Height:</b> Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.</p>	<p>The development is located in a city centre location and is surrounded by varying heights. To the north of the site along Forbes Lane, is an apartment complex with heights up to 6 storeys and located to the east of the site is the St. Catherine’s Sports Centre which is managed by Dublin City Council. The centre ranges in height from 2-4 storeys and caters for a range of services and facilities including all weather pitch, conference rooms, sports hall studio, gym, basketball court and community garden. The Malthouse apartment complex bounds the site to the south of the site. To the west of the site is the Dolphins Barn Telephone Exchange, which is between 1-2 storeys in height.</p> <p>The proposed development height is guided by the base heights advised under SDRA 15.</p>
<p><b>Urban Greening and Biodiversity:</b> Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.</p>	<p>The proposed public open space provision is delivered through a civic space/public realm space fronting Marrowbone Lane and Forbes Lane. The proposed civic space is 800 sqm at the site is in excess of 10% requirement.</p> <p>According to the Preliminary Ecological Appraisal prepared by NM Ecology, the site has no baseline ecological value. The proposed landscape design aims to strengthen the value of the site as a place for delivering green/ blue infrastructure whilst protecting and enhancing the natural/built and cultural assets of the site.</p>



Objective SDRA01	Development Response
	<p>A Biodiversity Enhancement Plan has been incorporated into the Landscape Design Report prepared by Mitchell + Associates. NM Ecology and MCORM also inputted into this plan. Subject to the delivery of the landscaping proposals for the scheme, it may be possible to achieve a net gain in the biodiversity value of the site.</p>
<p><b>Surface Water Management:</b> All development proposals should provide for sustainable surface water management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature based solutions. See Appendix 11, 12 and 13 for further detail.</p>	<p>For full details of the proposed water services strategy, please refer to the materials prepared by Malone O'Regan and submitted under separate cover. Included in the Engineering Report submitted as part of this application, is an Integrated Surface Water Management Plan/Strategy. The Surface Water Management Plan includes nature-based drainage measures such as green/blue roofs and permeable paving to enhance runoff quality, amenity and biodiversity as well as reduce runoff quantity.</p>
<p><b>Flood Risk:</b> All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA.</p>	<p>The proposed development site falls within a predictive Flood Zone C scenario, however a Flood Zone B is mapped as slightly encroaching part of the south-eastern boundary. A desktop Flood Risk Assessment was undertaken by Malone O'Regan and accompanies this application.</p>
<p><b>River Restoration:</b> Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible: SDRA 1 Clongriffin/Belmayne and Environs; SDRA 3 Finglas Village Environs and Jamestown Lands; SDRA 4 Park West/Cherry Orchard; SDRA 5 Naas Road; SDRA 6 Docklands; SDRA 7 Heuston and Environs; SDRA 9 Emmet Road; SDRA 10 North East Inner City and SDRA 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail.</p>	<p>Not applicable for the subject SDRA. However, it is noted that during consultations with DCC, the design team were informed of a possible historical culvert near the vicinity of the site. The Rivers of Dublin book was reviewed to give more information about the culvert. Figure 3.11 of the Desktop Flood Risk Assessment shows an excerpt of the map for the site location.</p> <p>It appears that the historic culvert is a culvert of the Abbey Stream which originates from circa the 12th century. The monks of St. Thomas Abbey constructed a high-level artificial take-off channel from the river near Mount Jerome cemetery and this stream passes the site on its 2.5mile long route.</p> <p>Recent records and current survey information to date does not indicate that the culvert extends as indicated on the northwestern area of the site. Further survey investigations took place to identify and verify the culvert location. However, after site investigation slit trenches along the culvert path and CCTV surveys it has become apparent that this culvert is now the main 600/750mm diameter concrete surface water sewer line</p>

Objective SDRA01	Development Response
	running parallel to the northern boundary of the site along Forbes Lane.
<p><b>Sustainable Energy:</b> Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDRA 6 (Docklands) and SDRA 10 (NEIC) where applicants must demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDRA 7 (Heuston and Environs), SDRA 8 (Grangegorman/Broadstone), SDRA 11 (St. Teresa's Garden and Environs), SDRA 14 (St. James's Healthcare Campus and Environs), SDRA 15 (Liberties and Newmarket Square) where possible connections or interconnections to existing heat networks in the area, to create a district heating 'node' must be investigated.</p>	<p>Please refer to the accompanying Climate Action Energy Statement, Sustainability &amp; Part L Report.</p>
<p><b>Climate Change:</b> Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.</p>	<p>Please refer to the accompanying Climate Action Energy Statement, Sustainability &amp; Part L Report.</p>
<p><b>Cultural Infrastructure:</b> All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25 for further detail.</p>	<p>The proposed development provides over 2.5% community, arts, and cultural spaces. Please see the Architectural &amp; Urban Design Statement and area schedules for details. The proposed development includes 190 sqm of community, cultural and arts space that will be flexible in nature to allow for the space to cater for a range of activities and uses for both residents of the scheme and the wider community of Liberties. The remaining 2.5% provision of community, arts and cultural space has been reallocated to a concurrent Part</p>

Objective SDRAO1	Development Response
	8 application at Basin View Flats, located c. 300m from the proposed development at Forbes Lane.

The latter element is largely reprised under CUO25 ‘SDRA and Large Scale Developments’ which elaborates on the requirement as follows:

*‘All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area\* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*

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

The proposed development includes 190 sqm of community, arts and cultural space which is below the required 5% space required at the subject site. The net internal area of the proposed development is 7144 sqm which results in an area of 357.2 sqm (5%) required at the site to comply with CUO25. The remaining 170 sqm (c.2.5%) provision is allocated at a nearby concurrent Part 8 development at Basin View Flats, Dublin 8, which is also being delivered under the NDFA’s Social Housing Bundle 4&5. As outlined under CUO25 it is permissible to relocate a portion (no more than half of this figure) to a site immediately adjacent to the area. Therefore, it is considered appropriate that a portion of the Forbes Lane depot site was reallocated to the Basin View Flats site located c.300m from this Part 8 application site.

The community, arts and cultural provision of 190 sqm of internal space at the ground floor of Block A, consisting of two spaces of 108 sqm and 82 sqm respectively. The proposed quantum of 190 sqm therefore exceeds the 2.5% provision required at the site. The proposed community, arts and cultural space will be managed by PPP co. and will be open and available for both residents and the surrounding community to utilise. The proposed development includes internal community space that has been designed to be flexible in nature to allow the space to cater for a range of activities and needs as they arise. A booking system will be developed during the operation of the scheme to facilitate activities and meeting space requirements as the needs arise.

The reallocation of a portion of community, arts and cultural space from this subject application to the Basin Street Flats redevelopment enables a greater quantum of space at Basin View to derive better outcomes for the usage of the community, arts and cultural provision, which endeavours to provide high-quality internal and external space for residents of the prospective scheme to utilise, but also the surrounding community. The proposed community, arts and cultural space at Basin View Flats, Dublin 8 includes 1206 sqm of space, which will comprise of 516 sqm of internal space at the ground floor of Block B and 690 sqm of external space, which includes a 544 sqm amphitheatre and 146 sqm space located externally at Block B will be delivered as part of the scheme. The external areas are strategically linked to connect the different internal community, arts and cultural space, creating a synergy of spaces in turn enhancing the cultural vibrancy of the public realm within the development.

As stated earlier, the SDRA also sets the spatial principles for the development and regeneration of the Liberties and Newmarket Square. These include inter alia:

- To support the regeneration of large blocks in order to provide the opportunity to improve the human scale of the existing urban structure.
- To reinforce a sense of place and identity by promoting the development of distinctive character areas as indicated on the Guiding Principles Map
- To recognise the need for community uses and public spaces to complement the emerging development in recent decades.
- To support 6-8 storeys as a benchmark height for new developments in the SDRA area where conservation and design considerations permit. Opportunities for locally higher buildings above the benchmark height, that will be slender in nature, are identified in the accompanying Guiding Principles Map.
- Opportunities exist for buildings of increased height in line with the considerations outlined in Appendix 3 of the development plan. The potential locations for locally higher buildings are shown on the accompanying Guiding Principles Map, with an indication of potential heights set down for the different character areas below, as relevant.
- To ensure that new buildings respond to the scale and grain of the prevailing character of the particular street.
- To facilitate the creation of high quality cycle and walking routes that connect to existing and emerging public open space provision. These routes should be the subject of greening, where possible

The SDRA is presented in map format below.



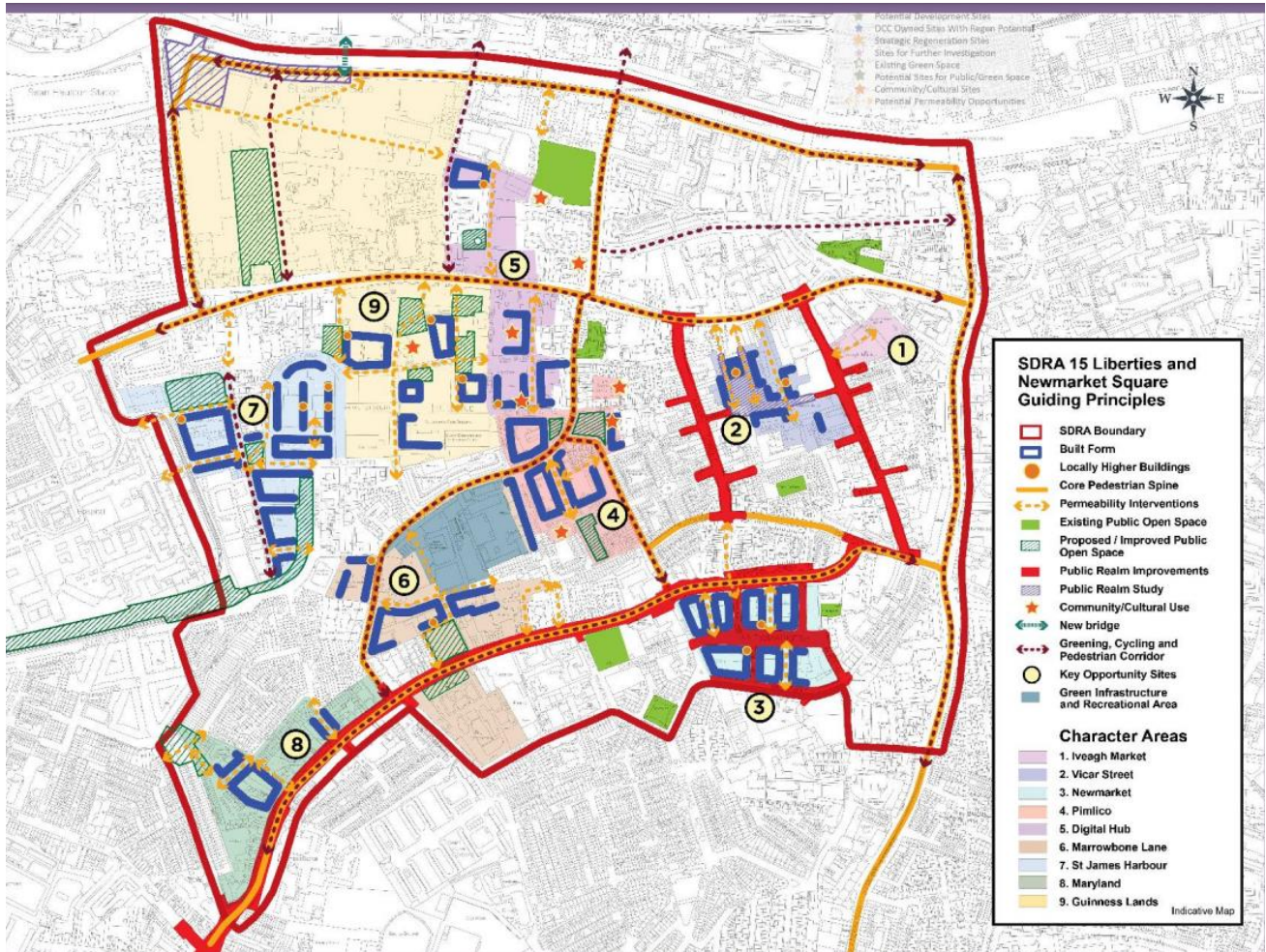


Figure 13: Guiding Principles for SDR 15 (Source: DCC)

The site is annotated within the Marrowbone Lane character area. The key guiding principles applicable to the site include:

- A core pedestrian spine and greening, cycling and pedestrian corridor along Marrowbone Lane
- Locally higher building indicated at the northern corner of the site.
- Indicative built form at the site includes two blocks with frontage along Marrowbone and Forbes Lane.
- Permeability interventions proposed at the parcel of land adjoining the site along Marrowbone Lane, notably a new east to west permeability link.

In addition, as noted above the SDR includes consideration for heights. It notes that proposed heights should respond to prevailing scale and grain of the building stock, relate to the width of streets and respond to unique site characteristics such as topography and aspect. It is also acknowledged that DCC support 6-8 storeys as a benchmark height for new developments in the SDR area where conservation and design considerations permit. Opportunities for locally higher buildings above the benchmark height, that will be slender in nature, are identified in the accompanying Guiding Principles Map.

However, the SDR further notes that that proposed heights should respond to prevailing scale and grain of the building stock, relate to the width of streets and respond to unique site characteristics such as topography and aspect. In this regard, the proposed development is located on a sloping site and bound by existing narrow carriageways along Forbes and Marrowbone Lane, and therefore, owing to the site's characteristics it is considered that the base heights of 5 to 7 storeys at the site are considered to comply with the SDR while also



protecting the existing residential amenity surrounding the site and complying with the applicable standards for sunlight and daylight in the scheme.

### **Quality Housing and Sustainable Neighbourhoods**

Under QHSN3, the Council seeks to implement its Housing Strategy and Housing Need and Demand Assessment (HNDA) and to encourage the provision of a variety of housing typologies and tenures. The proposed development includes 108 units, of which 64 are 1-bed (59%), 31 are 2-bed (29%) and 13 are 3-bed (12%). The site forms part the 'Dublin 8' area which is subject to one of the sub-City HNDA in the Dublin City Development Plan 2022-2028. Each multi-unit residential development shall contain:

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

However, following the exemptions outlined in Table 37 of the Housing Strategy Appendix 1 of the Development Plan, Council Part 8 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department. As part of the design process, the Housing & Community Services Department of DCC have guided the unit mix requirements in the area as informed by the Housing Waiting List for Area L. Section 4.2 of this report, has identified a strong need for one-bed units. On this basis, the proposed development complies.

The part 8 application also supports the achievement of QHSN9 on active land management. The lands were identified as an underutilised site which could contribute to the consolidation and general improvement of the area. With a proposed density of 203.8 uph, based off a net site of c.0.53 ha, the proposal aligns with QHSN10 ('Urban Density') as the part 8 site is an infill site and is underutilised. Its most recent use as the Dublin City Road Maintenance Depot is at odds with the surrounding uses. The development also provides the opportunities to cater for homes to support the creation of communities and to sustain constant all year-round activity in the area. The proposed development will be of high standards of urban design and architecture.

Under this chapter and specifically QHSN11, the Council promotes the realisation of the 15-minute city which *'provides liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible'*. Meanwhile, QHSN12 promotes neighbourhood development.

The proposed development will provide high quality housing for a range of households in a city centre location. It avails of high accessibility to public transport and is close to a range of facilities. The Social Infrastructure Audit report prepared to accompany this Part 8 application shows the wide range of facilities available within 15 minutes of the site. The site is ideally located to achieve a 15 minute city lifestyle for its residents.

Dublin City Council Development Plan advises that a minimum of 50% of apartments are to exceed minimum area standards by 10%, and that in addition, 50% of apartments that are in excess of minimum size requirements are to be designed to be Universal Design (UD) compliant. The UD standards noted are the requirements of the 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design (National Disability Authority). Based on this requirement, the minimum provision of UD apartments would be 25%. The proposed development comprises 29 no. apartments designed to UD standards.

The proposed development includes a community, cultural and arts space (190sqm). Provision of such space is aligned with policies QHSN47 High Quality Neighbourhood and Community Facilities and QHSN50 Inclusive Social and Community Infrastructure. A Social Infrastructure Audit accompanies this part 8 submission in accordance with QHSN48 Community and Social Audit.

### ***Sustainable Movement and Transport***

Under chapter 8 of the CDP, Policy SMT1 'Modal Shift and Compact Growth' and objective SMT01 'Transition to More Sustainable Travel Modes', the Council promote a shift from the use of private car towards an increased use of more sustainable forms of transport and more active mobility. The proposed development includes for 2 no. car parking space or a ratio of 0.01. It makes generous allocations for cycle parking, including cargo bikes and it is located near a range of bus routes and within c.300m of the Fatima Luas Stop. The proposed development supports both the policy and the objective.

In accordance with policy SMT4 'Integration of Public Transport Services and Development', the proposed development has a density of 203.8 uph, provides for connectivity between uses, and includes facilities which can be used by the broader community.

Vehicular access is proposed from Marrowbone Lane. A pedestrian and cycle access route is proposed at Forbes Lane which also provides emergency vehicle access. The proposed buildings require high reach emergency vehicle access to at least 50% of the building perimeter in compliance with DCC Fire Department requirements for buildings over 4 storeys. This is provided along both Forbes Lane and Marrowbone Lane and the new internal shared street. The new internal street includes removable bollards at Forbes Lane to facilitate the emergency access and to prevent day to day vehicular traffic through the site. Details of the emergency access vehicle route through the shared street is available to view on drawing no. SH5-FLD-DR-MOR-CS-P3-115 Swept Path Analysis Fire Tender.

The accompanying Traffic Mobility Management Plan prepared by Malone O'Regan includes a section on Mobility Management measures, that range from both hard and soft measures to be implemented once the site is occupied, which accords with SMT6.

High quality public realm proposals are catered for as part of the development in accordance with SMT9. The development will particularly help improve the outlook on Forbes and Marrowbone Lane with a new strong and active building frontage and footpath widening. Currently, the footpath is in a poor state and narrow with one footpath along Forbes Lane. Furthermore, the set back of the building along Forbes Lane will facilitate an active travel route as a result of the subsequent widening of the street. The widening of the street will facilitate the Kilmainham to Thomas Street Active Travel project, extending along Forbes Lane and Marrowbone Lane. The project is being delivered on a phased basis, with the Suir Road to Thomas Street Interim Scheme having commenced construction in Q3 of 2023. The second phase is a permanent scheme which will be delivered between 2024 and 2026. As part of the design process, the Design Team have engaged with the Active Travel unit in DCC in order to deliver an appropriate design responses to ensure that the subject development does not encroach on the preferred design option of the route. The delivery of this active travel route will be subject to separate consent process.

In addition, all areas of public and communal open space are sheltered from the road and well overlooked by residential units and balconies. Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan prepared by Mitchell + Associates.

Under SMT010 'Walking and Cycling Audits', the suite of documentation prepared for this Part 8 application includes a walking and cycling audit. Please refer to the Traffic Mobility Management Plan. A Quality Audit has been undertaken and accompanies the proposed development. In accordance with DMURS, this Quality Audit includes a Walking and Cycling Audit. The Quality Audit also incorporates a Stage 1 Road Safety Audit to ensure that all road safety implications are fully addressed at planning design stage. This ensures that a safe street environment is being implemented and delivered by the proposed development design.

SMT27 'Car Parking in Residential and Mixed Use Developments' promotes sustainable car parking with a view to promote city living and reduced car parking standards. Car parking standards are set out in Appendix 5, Section 4, Table 2 of the Dublin City Development Plan 2022-2028. The site is located within parking zone 1 due to its location within the Canal Cordon and North Circular Road, and its proximity to active travel infrastructure and opportunities where major public transport corridors intersect. In this regard, the proposed development includes minimal parking due to its location in the city centre and its proximity to an array of services and amenities that can serve the population generated from the proposed development. The proposed development includes 2 no. spaces.

It is considered that the subject development site is located within an "Central Urban Location" as designated within the DHPLG Apartment standards, on the basis of proximity to high capacity urban public transport stops. The subject site is considered to be within walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (with the Fatima Luas Stop only 340m away); and within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services. For all types of locations, where it is sought to eliminate or reduce car parking provision, it is necessary to ensure, where possible, the provision of an appropriate number of drop off areas and parking for the mobility impaired. Provision is also to be made for alternative mobility solutions including facilities for cycle parking and secure storage. It is an objective for this development to reduce the need for commuters to travel by car and instead to avail of more sustainable modes of travel in line with current and future travel requirements as set out in national, regional and local policy documents.

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

In terms of bicycle parking, 165 long stay spaces are provided and 54 short stay spaces are provided. This equates to an overall quantum of 219 no. spaces. This includes dedicated long term and short term bicycle parking for the community, arts and cultural uses at the site. Bicycle stores are in the form of secure indoor rooms within the ground floor of the building. Visitor bicycle parking in the public realm is well overlooked from apartments units.

**Green Infrastructure and Recreation**

A number of policy objectives relate to green infrastructure. In particular, it requires under GI4 'Accessibility', that all green infrastructure elements should be universally accessible and that new developments should include green infrastructure and an ecosystem services approach (GI6 'New Development / New Growth Areas'). All areas of open space will be universally accessible and will incorporate blue and green roofs, as well high quality landscape features which together will support mitigation and adaptation to climate change.

GI01 ('Green Roof Guidance Document') should also be noted. The development response is provided under the development management section of this report. GI28 'New Residential Development' requires that, in new developments, public open space is provided which is sufficient in amenity, quantity and distribution. The proposed development includes high quality public realm space and communal open space, which exceeds the minimum requirements for the site and therefore is considered to meet this requirement.

The CDP also includes policies on tree planting and retention. In particular, it requires appropriate and long-term tree planting in the planning of new developments (GI40) and the protection of existing trees (GI41). The existing ecological value of the site is poor owing to its existing use. As a result of the development, its ecological quality will improve, and the site will make positive contribution the City's green infrastructure network.

The development includes children's play facilities in the communal open space as required under GI51 and GI52. The proposed development comprises a play area, which provides play equipment for toddlers and children up to the age of six. Please refer to drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan prepared by Mitchell + Associates.

**Built Heritage and Archaeology**

Chapter 11 of the Development Plan pertains to Built Heritage and Archaeology. Having regard to the context of the site, it is considered pertinent to respond to the policies of relevance to the proposed development below. Please refer to the accompanying Preliminary Heritage Impact Assessment Report prepared by Mesh Architects and Archaeological Impact Assessment prepared by John Purcell Archaeological Consulting which accompany this application for further information.

**Table 6: Chapter 11 Built Heritage and Archaeology Policies**

Policy	Response
<p>BHA2(a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.</p>	<p>None of the existing structures or site features were recorded by the National Inventory of Architectural History, and none are specifically protected by inclusion on the Dublin Record of Protected Structures. In summary, according to the accompanying Preliminary Architectural Heritage Assessment, none of the structures standing within the boundaries of the current development site are considered to have any particular architectural or historical significance.</p> <p>As part of the Preliminary Heritage Impact Assessment Report, surrounding structures of heritage value were also assessed by a Grade 1 Conservation Architect, Tom McGimsey. These structures include several small terraced houses stand on Pim Street, running north from Forbes Lane.</p>

Policy	Response
	<p>Four of the houses on the west side of Pim Street have been included on the RPS for Dublin, along with a large, and heavily altered, former grain store from the early 19th century. The proposed development has been designed to prevent any negative impacts on the setting of the protected houses on Pim Street. The proposed new blocks of apartments will be visible from these houses, but they are approximately 100m away from the development and there will be no direct impact. The historic streetscape along Pim Street has already been heavily impacted by large developments of flats and apartments, and the proposed development at the Forbes Lane Depot will not have a negative impact.</p> <p>Another Protected Structure stands at the junction of Pim Street and Bond Street, to the north of the previously mentioned houses. That structure is a 19th century former grain store that was heavily altered around 20 years ago with it was redeveloped into a block of apartments. The proposed development will have no impact on the structure's historical context.</p>
<p>BHA2(b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.</p>	<p>The application site does not include any building's recorded on the DCC record of protected structure. As noted in the above response, any potential impact to the protected structures in the vicinity of the site has been assessed as part of the Preliminary Architectural Heritage Assessment and has been detailed above.</p>
<p>BHA2(c) Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation.</p>	<p>A Grade 1 Conservation Architect, Tom McGimsey of Mesh Architects has been engaged by Dublin City Council and the NDFA to advise on conservation matters pertaining to the proposed development.</p>
<p>BHA2(d) Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.</p>	<p>The proposed development does not include any modification, alteration or extension to a structure of RPS status. The proposed development has endeavoured to deliver a scheme of appropriate scale, height, density, layout and materials whilst also ensuring the scheme complies with the provisions of the Dublin City Development Plan.</p>
<p>BHA4 Ministerial Recommendations:  To have regard to the National Inventory of Architectural Heritage (NIAH) rating of a structure and any associated Ministerial Recommendation in the assessment of planning applications.</p>	<p>The subject site does not contain any structure recorded on the NIAH. However, the site is proximate to a number of NIAH rated structures, including several terraced houses on Pim Street, running north of Forbes Lane. The NIAH record for No. 10 Pim Street, (Reg No 50080229) rated the house a having regional significance and of architectural interest. The date of construction is estimated as 1810-1830. This structure is not part of the subject development site, nor was it ever specifically connected to the historic activities that were carried out the subject development site. The proposal will not have any impact on the structures in the vicinity of the site listed on the NIAH.</p>



Policy	Response
<p>BHA6 Buildings on Historic Maps:</p> <p>That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report that it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).</p>	<p>A Preliminary Heritage Impact Assessment Report accompanies this application. None of the existing structures or site features were recorded by the National Inventory of Architectural History, and none are specifically protected by inclusion on the Dublin Record of Protected Structures.</p> <p>The various editions of the Ordnance Survey maps show the site of the proposed development, and illustrate how it has changed over the course of nearly two centuries of use. A full review has been conducted as part of the Preliminary Heritage Impact Assessment Report accompanying this application.</p> <p>In terms of the historic maps, Ordnance Survey maps dating to the 19<sup>th</sup> century illustrate the distillery. The pair of gabled houses in previous photo are likely to be the structures shown in the top right corner of this extract. The distillery, named the William Jameson Distillery, had been well developed by this date. The grain stores are at the northern edge of the complex, adjacent to the canal bank, with the brewing and distilling areas located running north to south. The curving stream is visible flowing through the property, and continuing to the north-east along near the edge of Marrowbone Lane. The two large sections of historic masonry that have survived on the site are also visible along the centre of the Marrowbone Lane frontage, and along the centre of the Forbes Lane frontage.</p> <p>While the proposed development site occupies the 19<sup>th</sup> century whiskey distillery, virtually all traces of that large industrial complex have been erased from the site. The only tangible links to the distillery are the fragmentary sections of former external building walls that now form parts of the external boundary walls along Marrowbone and Forbes Lane.</p>
<p>BHA11(a) Rehabilitation and Reuse of Existing Older Buildings:</p> <p>To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment.</p>	<p>It is proposed to demolish most of the existing structures that constitute the Depot, and to replace them with a new high density development of apartments.</p> <p>In considering the relative merits of the proposed development, Mesh Architects acknowledge that <i>"none of the upstanding structures or perimeter walls have been considered to have sufficient social, technical, historic or architectural significance to merit its inclusion on the Record of Protected Structures. The remaining single elevations were part of vernacular industrial structures from the mid-to-late 19<sup>th</sup> century, their exposed calp limestone masonry is of very good quality and provides this heavily redeveloped quarter of inner city Dublin with an attractive and tangible link with its traditional industries and building types."</i> The proposal will retain the east elevation of the former gate house along</p>

Policy	Response
	<p>Marrowbone Lane, and a portion of the rubble stone walls along Forbes Lane.</p> <p>The accompanying Preliminary Architectural Heritage Assessment states: <i>"In an area where so much of Dublin's historical industrial heritage has already been demolished, the fragmentary remains of the 19th century Marrowbone Lane Distillery provide a tactile link to the area's industrial past. Having originally been the external walls to some of the distillery's distinctive structures, the walls that survive as part of the external site boundary walls now provide only a limited sense of their former identity. However, owing to the high quality of the 19th century stone and brick masonry, and their historical connection to the 1916 Rising, these fragments merit retention, and the design team have managed to weave them into the fabric of the proposed new development."</i></p> <p>The application site is zoned for residential development The proposed scheme involves the development of an underutilised infill site in an urban core location and will contribute towards delivering compact and sustainable growth in Dublin City. These matters must be balanced against national, regional and local policy's emphasis on compact growth and more efficiently and sustainably using land within existing settlement.</p> <p>The proposed development has insofar as possible sought to retain the existing character of the site whilst also delivering much needed residential accommodation within the city centre. It is proposed to retain and modify part of the northern and eastern boundary walls. The rubble stone masonry, and simple window openings along both lanes are examples of robust and good quality stone masonry, as typified by the industrial structures of 19th century Dublin. Those remnants of former elevations are important elements in the local streetscape and will be preserved within the redeveloped site.</p>
<p>BHA11(b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.</p>	<p>The proposed development has endeavoured to achieve a delicate balance to delivering a high-quality residential scheme and community uses at the site while also preserving the industrial heritage of the site. In this regard, none of the 19th century buildings have survived fully intact, with only the 19th century masonry along both Forbes Lane and Marrowbone Lane of historical significance, as fragmentary remnants of Dublin's rich industrial heritage, and for their relevance to the 1916 Rising.</p> <p>The rubble stone masonry, and simple window openings along both lanes are examples of robust and good quality stone masonry, as typified by the industrial structures of 19th century Dublin As they now stand, both sections of masonry offer limited opportunity for redevelopment, other than to</p>

Policy	Response
	<p>stand as fragments of previous industrial buildings, in their original locations. The retention of the elevations will provide an important element of the built form for the redevelopment of the site and the local streetscape. Stone and brick material forming the existing boundary wall will be salvaged and incorporated into a new feature wall along the proposed internal shared surface street.</p>
<p>BHA11(c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.</p>	<p>Appropriate materials will be utilised where necessary to carry out any repairs to the retention of the historic fabric. In particular, it is noted that the rubble stone masonry will be repaired and repointed following conservation best practice, and all interventions to accommodate the new development will carefully detailed and executed, to recognise that those are contemporary interventions to the historic architectural fabric.</p> <p>In making modifications to the existing sections of historic masonry, it would be best practice to use traditional lime mortars to repair or rebuild portions of the masonry where required. The concrete blocks used to fill in the door and window openings should be carefully removed to avoid damaging the original brick reveals, and the mortar joints should be repointed using traditional lime and sand mortar, to closely match the composition and appearance of the remaining mortars.</p>
<p>BHA15(a) Twentieth Century Buildings and Structures:</p> <p>To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.</p>	<p>All existing structures on the site have been assessed by a Grade 1 Conservation Architect and are detailed and photographed in the accompanying Preliminary Heritage Impact Assessment Report.</p> <p>During the 1916 Rising in Dublin, the distillery was occupied by a small force of Irish Volunteers, only to surrender at the cessation of the hostilities. A small commemorative plaque can be seen on the stone gate piers facing onto James' Walk, currently serving as the boundary wall to the telecommunications complex. Over the course of the next half century, virtually all traces of the vast distillery were gradually demolished, leaving only a few remnants of the plant's structures standing as boundary walls. The site was largely redeveloped during the late 20th century to serve as a storage and maintenance depot for the Dublin Streets Department, a use that continues to the present time. None of the structures dated 20<sup>th</sup> century structures are considered to have any particular historical or architectural significance.</p>
<p>BHA15(b) To encourage the retention and reinstatement of internal and external features, that contribute to the character of exemplar twentieth century buildings, such as roofscapes, boundary treatments, fenestration pattern, materials, and other features, fixtures</p>	<p>None of the existing structures on site have any connection to the historic distillery operations, and date from no earlier than the second half of the 20th century. All structures were assessed by a Grade 1 Conservation Architect and are considered to have no architectural or historical significance.</p>

Policy	Response
and fittings (including furniture and art work), considered worthy of retention.	
<p>BHA16 Industrial Heritage:</p> <p>To have regard to the city’s industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans and the assessment of planning applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City.</p>	<p>It is noted that the site was recorded on the DCIHR in 2009. The record acknowledges its former distillery use but no description has been provided on the DCIHR in relation to the site. Notably, since its inclusion on the DCIHR in 2009 it has neither been added to the DCC Record of Protected Structures nor the NIAH.</p>
<p>BHA24 Reuse and Refurbishment of Historic Buildings:</p> <p>Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high-quality architecture and quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership.</p>	<p>In summary, none of the structures standing within the boundaries of the current depot are considered to have any particular architectural or historical significance. They were not surveyed by the National Inventory of Architectural Heritage, and they are not included on the Record of Protected Structures. Their loss will not have a significant impact on the industrial heritage of Dublin. The only tangible links to the distillery are the fragmentary sections of former external building walls that now form parts of the external boundary walls along Marrowbone Lane and Forbes Lane. Those remnants of former elevations are important elements in the local streetscape and sections will be preserved as part of the redevelopment of the site. Where possible existing brickwork and stonework will be repurposed as part of the proposed scheme.</p>

It is submitted that the accompanying Preliminary Architectural Heritage Assessment provides a sufficient account and assessment of the existing built fabric of the site. It is noted that the proposed development is not subject to the requirement to prepare a Conservation Report/ Architectural Heritage Impact Assessment, owing to the following provisions of the Development Plan:

- Table 15-1 of the Development Plan also outlines the thresholds for planning applications, in relation to Conservation Report, it’s advised that “any development relating to a protected structure, within the curtilage of a protected structure, and / or effecting or within the curtilage of a protected monument. Developments within an ACA may require report depending on the scale of development proposed.”
- Chapter 11 of the CDP (Page 346) notes that: ‘ All planning applications relating to protected structures shall contain the appropriate level of documentation in accordance with Article 23 (2) of the Planning and Development Regulations, 2001 (as amended) and Chapter 6 and Appendix B of the ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011), or any variation thereof including where relevant an Architectural Heritage Impact Assessment.’

We submit that the application does not relate to a Protected Structure and is also outside the curtilage of a protected structure adjacent to the site. Therefore, the need for an Architectural Heritage Impact Assessment would not be applicable.

In terms of archaeology, an Archaeological Impact Assessment (AIA) has been prepared by John Purcell Archaeological Consultancy. Policy Objectives BHA26.4 of the Development Plan requires development proposals within the Record of Monuments and Places (RMP) as established under Section 12 of the National Monuments (Amendment) Act 1994, notification of sites over 0.5 hectares size with potential underwater impacts and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.

As part of the pre-part 8 process, an archaeological impact assessment has been prepared and submitted as part of the pre-part 8 process, which allows for Technical departments such as City Archaeologists to provide feedback on the documentation and plans submitted and outline any issues prior to the formal initiation of the Part 8 procedure. In this regard, it is considered that the pre-part 8 process and the archaeological assessment submitted as part of the pre-part 8 process meet the requirements of BHA26.4 (Section 11.5.5).

In summary the Archaeological Impact Assessment report found that despite the surface-level disturbances and demolitions, there is a high potential for related structures to remain preserved at sub-surface levels beneath the existing concrete slab covering the site. Therefore it is recommended that archaeological testing is undertaken prior to the commencement of development.

### Culture

In accordance with CUO25, the proposed development is located in a SDRA and therefore, the provision of 5% community, arts and cultural space at the site applies. The total internal space is 7144 sqm. 5% of the net internal space would equate to 357.2 sqm space required to comply with CUO25. The proposed development includes 190 sqm of community, cultural and arts space located at ground floor level. The remaining 2.5% provision has been reallocated to a concurrent Part 8 application site at Basin View Flats, Dublin 8 which is also being delivered under the NDFA Social Housing Bundle 4 & 5 programme. The reallocation of 2.5% will deliver a greater quantum of space at Basin View through the delivery of external space including an amphitheatre and internal space which has been designed to be multi-functional in nature to allow for flexibility in its use for residents and the general public.

The proposed community, arts and cultural space at the subject site will be managed by PPP co. and open and available for both residents and the surrounding community to utilise. The proposed development includes internal community space that has been designed to be flexible in nature to allow the space to cater for a range of activities and needs as they arise. A booking system will be developed during the operation of the scheme to facilitate activities and meeting space requirements as the needs arise.

### Development Management Standards

The development management standards are contained in the Chapter 15 of the Dublin City Development Plan 2022-2028. Table 15-1 of the CDP shows the suite of documents required to accompany applications for development.

**Table 7: Planning Application Documentation**

Reports	Threshold	Application Reference
Architectural Design Report	50 or more residential units	See Architect Design Statement
Housing Quality Assessment	All residential development	See HQA
Landscape Design Report	30 or more residential units	See Landscape Design Report



Reports	Threshold	Application Reference
Planning Report	30 or more residential units	This report
Daylight and Sunlight Assessment	All apartment developments	See Daylight and Sunlight Assessment
Community and Social Audit	50 or more residential units Any development comprising of community or social infrastructure	See Social Infrastructure Audit
Lifecycle Report	All apartment developments	See Building Lifecycle Report
Community Safety Strategy	100 residential units	See Architect Design Statement
Operational Management Statement	30 or more residential units	See Building Lifecycle Report and Operational Waste Management Plan
Traffic and Transport Assessment	50 or more residential units	See Traffic Mobility Management Plan
Mobility Management Plan / Travel Plan	20 or more residential units Any development with zero/reduced car parking.	See Traffic Mobility Management Plan
Road Safety Audit	Any development with construction of new roads, materially affects vulnerable users and amends existing roads or generating significant road movement	See Quality Audit
Site Specific Flood Risk Assessment	Any developments within a flood zone a and b	See Desktop Flood Risk Assessment
Engineering Services Report (Civil and Structural)	30 or more residential units	See Engineering Report
Site Investigation Report	All developments on site that comprise of contaminated lands and/or where basement is proposed.	See Site Investigation Report and Waste Classification Report
Construction Management Plan	30 or more residential units	See Construction & Environmental Management Plan
Construction Demolition Waste Management Plan	30 or more residential units	See Resource Waste Management Plan
Operational Waste Management Plan	30 or more residential units	See Operational Waste Management Plan
Climate Action and Energy Statement (including District Heating)	30 or more residential units	See Climate Action and Energy Statement, Sustainability & Part L Compliance Report
Noise Assessment	Any noise generating use and or any development within designated noise zones as	n/a

Reports	Threshold	Application Reference
	indicated on development plan zoning maps.	
Conservation report	Any development relating to a protected structure, within the curtilage of a protected structure, and / or effecting or within the curtilage of a protected monument.	Preliminary Heritage Impact Assessment Report. A full Conservation Report is not applicable for the subject site.
Retail Impact Assessment	Retail development *** of 2,000 sq. m (net comparison floorspace) and 1,500 sq. m. (net convenience floorspace) outside of the city centre and KUV's.	n/a
Ecological Impact Assessment	All developments that are located within or adjacent to any sensitive habitat, on sites that could contain protected species or in a quality landscape environment.	See Preliminary Ecological Appraisal.
Appropriate Assessment Screening and NIS	An Appropriate Assessment Screening is required for all developments. A stage 2 (Natura Impact Statement) is required where significant effects on the environment are likely either alone or in combination with any other project.	See Appropriate Assessment Screening Report. NIS not required.
Environmental Impact Assessment	All developments within the threshold set out in Planning and Development Act 2000, as amended or any development that has a significant impact on the environment.	See EIA Screening Report.
Landscape and Visual Impact Assessment, Microclimate Assessment, Telecommunications Report – see Appendix 3	Site specific circumstances	There will be no impact on local telecommunications as part of the development. A telecommunications report is therefore not required.  A Microclimate Study has been prepared by B-Fluid Wind Modelling.

In addition, to the above documentation, a number of additional documents accompany this application:

- A biodiversity enhancement plan has been incorporated within the Landscape Design Report.

- An Archaeological Impact Assessment prepared by John Purcell Archaeological Consulting accompanies this Part 8 application.
- A series of verified photomontages and CGIs have been developed in respect of the scheme and accompany this application. Having regard to the modest scale of development at an infill site, the proposed insertion of the development within the existing landscape context is considered appropriate. The proposal has sought to deliver a high quality residential development on the infill site while also enhancing the public realm. On account of the existing setting of the site, the proposed scheme will positively impact the landscape character and visual amenity on account of the existing setting.

### Green Infrastructure and Landscaping

The CDP requires that planning applications address climate action as part of the overall design and incorporate green infrastructure techniques. In addition to the retention of existing natural features, the development should include:

Standard	Development Response
<p>Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.</p>	<p>The development works with the topography of the site which generally slopes from north-west to south-east with approximately 3m level differences across the site. Having regard to the site currently consisting almost entirely of buildings and artificial surfaces which are of no ecological value. Following the implementation of biodiversity enhancements through the landscaping proposals and SUDs measures at the scheme, it may be possible to achieve a net gain in the biodiversity value at the site.</p>
<p>The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city’s green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and ‘stepping stones’ to ensure biodiversity protection.</p> <p>(see also GI7 ‘Connecting Greening Elements in Site Design’)</p>	<p>The proposed landscaping strategy for the site has had regard to the Liberties Greening Strategy. Throughout the scheme and along Forbes and Marrowbone Lane, extensive landscaping is proposed which will complement and enhance the proposed recreational and green infrastructure works at Marrowbone Lane Depot. In addition, as noted in the SDRA, indicative permeability links between Marrowbone Lane and the depot site are illustrated in the guiding principles map of SDRA 15. The proposed development will positively contribute to delivering green infrastructure in the Liberties area.</p>
<p>Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council’s Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the</p>	<p>The ecological quality of the site is limited and has limited ecological attributes. The potential impact has been assessed as part of the Preliminary Ecological Appraisal.</p>

Standard	Development Response
ecological attributes of the site and the impact of any development should be considered prior to final design.	

**Surface Water Management and SuDS**

Standard	Development Response
All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council’s Surface Water Management Guidance.	A Surface Water Management Plan for the Development is incorporated into Malone O’Regan’s Engineering Report.
SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer	Please refer to the Engineering Report prepared by Malone O’Regan which provides a comprehensive overview of the SuDS measures proposed at the site. In addition, drawing no. SHB5-FLD-DR-MOR-CS-P3-150

**Green/Blue Roof**

Consideration	Development Response
All new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23	Details of the proposed green / blue roof build-up are provided on Malone O’Regan drawing no. SHB5-FLD-DR-MOR- CS-P3-150.

**Urban Greening**

Consideration	Development Response
All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc.	Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan prepared by Mitchell + Associates.

**Landscape Plans and Design Reports**

Consideration	Development Response
Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	A Landscape Design Report prepared by Mitchell Associates accompanies this application.
Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans	Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan prepared by Mitchell +Associates
A tree survey must be submitted where there are trees within a proposed planning application site.	Not applicable to the site as there is no existing trees within the Part 8 site.

**Public Open Space and Recreation**

Standard	Development Response
The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.	The proposed development comprises 800 sqm of public realm space that can be utilised as a civic space. This equates to 10% of the site area.
Open space should be overlooked and designed to ensure passive surveillance is achieved	The proposed communal open space is overlooked by Blocks A and B which will provide adequate passive surveillance. Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan prepared by Mitchell + Associates.
The space should be visible from and accessible to the maximum number of users.	Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan prepared by Mitchell + Associates.
Inaccessible or narrow unusable spaces will not be accepted.	No inaccessible or unusable spaces are proposed.
The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16	Please refer to the Daylight and Sunlight assessment prepared by Digital Dimensions with demonstrates the schemes compliance. All public and communal amenity areas meet and exceed the recommendations of the BRE guidelines, achieving sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21 <sup>st</sup> March.
Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks.	The proposed communal open space will be located in the courtyard between Block A and B. The landscaping strategy includes various biodiversity enhancement measures at the site which will improve the ecological value at the site.
Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	The application site includes no trees. As part of the development, extensive landscaping including planting is proposed.
Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.	
Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated biodiversity areas or wetlands which can reduce / better manage surface water run-off.	A coordinated approach within the landscape design has been taken for water management, with the provision of permeable surfaces and build-ups throughout the scheme
Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12).	The general planting strategy throughout the scheme is for adaptable trees to soften the proposed buildings in constraint areas, and a base layer of shrub planting to create low level seasonal interest and colour softening the hard surfaced areas, and road curtilage. The priority is given to locally sourced and native planting, when appropriate, to enhance



Standard	Development Response
	biodiversity and support local biome. Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan and Landscape Report prepared by Mitchell + Associates.
Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	We refer to the Architect’s Design Statement. A traditional red brick field material with off-white mortar colour is proposed as a gentle nod to the historic industrial buildings in the area that were built in brick with lime mortar. Variety is provided via red concrete detailing and contrasting charcoal window frames and balcony finishes.
Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.	Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan prepared by Mitchell + Associates. High quality open spaces which provide health and social benefits for people through the provision of formal and informal nature-based play areas, safe and attractive areas and routes for meeting with a variety of seating areas proposed as part of the development for socialising and relaxing, accessible walking routes facilitated.
Age friendly measures should be incorporated into the design.	Please refer to landscape drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan and Landscape Design Report prepared by Mitchell + Associates. Age friendly design measures have been incorporated into the landscape design to support a pleasant, clean, accessible and safe public realm, create an inclusive community and age friendly spaces
Permeability and accessibility for all users, particularly disabled persons should be provided	Please refer to the Architect’s Design Statement.
Cycle and pedestrian friendly routes should be accommodated.	Pedestrian and cycle movements are prioritised over car movements throughout the site.

**Boundary Treatments**

Standard	Development Response
Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.	Please refer to drawing no. SHB5-FLD-DR-MAL-L-P3-100-Landscape and biodiversity masterplan for details of the proposed Site Boundaries prepared by Mitchell + Associates.

**Public Open Space**

Standard	Development Response
<p>The planning authority will seek the provision of public open space in all residential schemes and commercial developments in excess of 5,000 sqm. In accordance with Table 15-1, 10% is required in Z1 zoning.</p>	<p>800 sqm of public realm space is proposed which will serve as a civic space at the junction of Forbes and Marrowbone Lane. The public realm space equates to 10% provision.</p>

**Play Infrastructure**

Standard	Development Response
<p>In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.</p>	<p>The development includes play areas in the proposed communal open space.</p>

**Apartment Standards**

Standard	Development Response
<p><b>Unit Mix</b>                      Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> <p>Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing &amp; Community Services Department.</p>	<p>This part 8 proposal was formulated jointly with the DCC Housing Department. The application site is located in the Sub-City – Dublin 8 HNDA where there is a specific housing unit mix recommended. However, given the site is a Council Part 8 scheme, a different mix has been proposed which aligns with the Housing Waiting List of Area L. The proposal therefore complies.</p>
<p><b>Unit Size / Layout</b>                      Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments</p>	<p>A HQA has been provided with this Part 8 application and provides a breakdown of each unit and demonstrates compliance. All units meet the floor area requirements.</p>
<p><b>Dual Aspect</b></p>	<p>59 apartment are dual aspect. This equates to 55% of units.</p>

Standard	Development Response
<p>Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate</p>	
<p><b>Floor to Ceiling Height</b> A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided</p>	<p>The proposed development has been designed in accordance with these standards and therefore complies.</p>
<p><b>Lift, Stair Cores and Entrance Lobbies</b> a maximum of 12 apartment per core may be provided</p>	<p>The proposed development complies.</p>
<p><b>Internal Storage</b> Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments</p>	<p>Internal storage has been provided in accordance with the Apartment Guidelines.</p>
<p><b>Private Amenity Space</b> Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p> <p>At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.</p>	<p>All units have been provided either with private balconies or ground floor terraces. All private amenity spaces meet or exceed the minimum floor area requirements set out in Appendix 1 of the apartment guidelines.</p> <p>Please refer to drawing SHB5-FLD-DR-MCO-AR-P3-0004-Site Layout for privacy strip at ground floor.</p>
<p><b>Communal Amenity Space</b> All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development. The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p>	<p>The proposed communal open space is allocated in the internal courtyard between Block A and B. The arrangement ensures that the communal space is secure, with access only possible for residents or invited guests. Appendix 1 of the Design Standards for New Apartments - Guidelines for Planning Authorities (2023) sets out minimum quantitative standards for communal open space and based on the number of units proposed a total of 652 sqm is required therefore the proposed development exceeds this requirement and provides for a generous quantum of 700 sqm communal open space.</p>

Standard	Development Response
<p><b>Internal Communal Facilities</b> Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.</p>	<p>The development is for 108 units and includes 190 sqm of community, arts and cultural space. It was not considered necessary to also provide communal space given the range in size of spaces proposed that will be accessible by residents.</p>
<p><b>Security</b> New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas.</p>	<p>Please refer to the Architect’s Design Statement which addresses the requirements of the Dublin City Development Plan, 2022-2028, Chapter 15.4.5 - Safe and Secure Design.</p>
<p><b>Access and Services</b> Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.</p>	<p>All pedestrian and vehicular access points are clearly defined and overlooked by the perimeter blocks and have been designed to suit all users, regardless of their abilities.</p>
<p><b>Refuse Storage</b> Refuse storage and collection facilities should be provided in all apartment schemes.  All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan.</p>	<p>Refuse storage is provided, please refer to drawing no. SHB5-FLD-DR-MCO-AR-P3-1000-Ground Floor Plan.  An Operational Waste Management Plan accompanies this part 8 application.</p>
<p><b>Lifecycle Reports</b> All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p>	<p>A Building Lifecycle Report accompanies this application.</p>
<p><b>Operational Management and Maintenance</b> All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p>	<p>A Building lifecycle report accompanies this application. It is intended that the development will be delivered through a Public Private Partnership (PPP) structure which will include maintenance and tenancy management services. Under this arrangement, the appointed PPP Company in partnership with an Approved Housing Body, will be responsible for the maintenance and management of the development and the life cycling of building elements on behalf of Dublin City Council and the residents over a 25-year period. Thereafter the maintenance and management of the development will be handed over to Dublin City Council.</p>
<p><b>Microclimate – daylight and sunlight, wind and noise</b></p>	<p>Previous sections of this report discuss these reports where appropriate, specifically the apartment</p>

Standard	Development Response
<p>All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind</p>	<p>guidelines section in relation to sunlight and daylight and the building height guidelines in relation to microclimate.</p> <p>In terms of noise, the scheme has been comprehensively considered from a noise perspective having regard to the additional measures that are proposed for certain façades in the scheme including an enhanced glazing system and enhanced ventilation systems. All apartment developments have been designed as to ensure noise transmission between units and from external or internal communal areas is minimised.</p>
<p><b>Daylight and Sunlight</b> A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>	<p>A daylight and sunlight assessment accompanies this part 8 application.</p>
<p><b>Separation Distance</b> Traditionally a minimum distance of 22m is required between opposing first floor windows.</p>	<p>The recently issued Compact Settlement Guidelines for Planning Authorities SPPR1 reduces the separation distance to a 16 meter distance, or below in certain circumstances.</p> <p>The proposed separation distance between opposing windows of the apartment blocks on all levels are in excess of 16m.</p> <p>The proposed separation distance complies with this requirement</p>

**Standards as Derived from the Appendices**

A number of standards are derived from the appendices of the CDP

Standard	Development Response
<p><b>Density Ranges</b> Table 1 – Appendix 3 state that density in the City Centre/ SDRA should be within a range of 100-250 uph.</p>	<p>The proposed development has a density of 203.8 uph and therefore is within the range of the CDP.</p>
<p><b>Plot ratio and coverage:</b> The site is located within the central area, therefore the following requirements are applicable:</p>	<p>The proposed plot ratio is 1.91. The proposed site coverage is 48%.</p>



Standard	Development Response
<p>Indicative plot ratio – 2.5-3.0 Indicative Site Coverage – 60-90%</p>	<p>The proposed development is below the indicative plot ratio and site coverage indicated in the Development Plan, however, it is noted that these standards are indicative rather than fixed. Overall, it is considered that the proposed site coverage and plot ratio are acceptable in this instance and indicative that the site is being appropriately developed.</p>
<p><b>Bicycle Parking Standards</b> Table 1 of appendix 5 sets out parking standards: <b>Residential</b> Long stay: 1 space per bedroom in residential apartments Short stay: 1 per two apartments <b>Community/ Arts/ Culture</b> Long stay: 1 space per 5 staff in community centre Short stay 1 per 100 sqm Gross Floor Area for community centre</p>	<p>165 long stay spaces are provided and 54 short stay spaces are provided. Adequate space is for cargo bike parking is also provided.</p>
<p><b>Car Parking Standards</b> The site falls under Zone 1 – Canal Cordon and North Circular Road Based on the proposal at this site the following standards apply: <b>Residential</b> 0.5 per dwelling <b>Community/ Arts/ Culture</b> 1 per 350 sqm GFA</p>	<p>The proposed development includes 2 no. spaces which equates to a ratio of 0.01. The Development Plan notes that a reduced car parking provision may be acceptable where the Council is satisfied that good public transport links are already available or planned and/or a Mobility Management Plan for the development demonstrates that a high percentage of modal shift in favour of the sustainable modes will be achieved through the development.</p>
<p><b>Electric Vehicles</b> All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.</p>	<p>The proposal for this development is that 50% all public spaces will have EV chargers installed in line with DCC development plan and the other space will ducted for future EV charging points. Please refer to drawing no. SHB5-FLD-DR-SMK-ME-P3-6035-EV Car Charging.</p>
<p><b>Motorcycle Parking</b> New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided</p>	<p>Having regard to the parking strategy at the site, and the priority of pedestrian and cyclist movement as a result of the proposed development, no motorcycle parking has been proposed as part of the development.</p>
<p><b>Waste Storage Facilities</b></p>	<p>The proposed Waste Storage Area for Apartment Blocks are located on ground level. Refer to drawing</p>

Standard	Development Response
<ul style="list-style-type: none"> <li>• Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of nonreusable receptacles such as bags, ideally of 1,100 litre capacity, must be used.</li> <li>• To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general (residual) waste, dry mixed recyclables and organic waste. A proposal on the three-bin system including bin quantity, type and frequency of collection must be submitted in writing to the Waste Regulation Unit in Dublin City Council for agreement. Sufficient space must be provided to accommodate the collection of dry mixed recyclables and organic waste.</li> <li>• Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes.</li> </ul>	<p>no.SHB5-FLD-DR-MCO-AR-P3-1000-Ground Floor Plan prepared by MCORM.</p> <p>The proposed waste storage facilities accord with these requirement, please refer to the Operational Waste Management Plan prepared by Traynor Environmental which accompanies this application</p>
<p><b>Green and Blue Roof</b></p> <p>Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application.</p> <p>The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.</p> <p>Minimum coverage for an extensive green roof is 70% Minimum coverage for an intensive green roof is 50%.</p>	<p>It is proposed to provide green/blue roofs over at least 50% of the total roof area with a further 25% as blue roof only in accordance with the Dublin City Council Green &amp; Blue Roof Guidelines 2021. Roof structures will be designed to cater for the additional loads associated with the blue roof storage layer and the overlying green roof build-up. Details of the proposed green / blue roof build-up are provided on Malone O'Regan drawing no. SHB5-FLD-DR-MOR-CS-P3-150.</p>
<p><b>SuDS Requirements</b></p> <p>SuDS requirement 1 – runoff destination SuDS requirement 2 – hydraulic control SuDS Requirement 3 – Water Quality SuDS Requirement 4 – Amenity SuDS Requirement 5 - Biodiversity</p>	<p>Please refer to the accompanying Engineering Report prepared by Malone O'Regan for details of the proposed SuDS measures and drawing no. SHB5-FLD-DR-MOR-CS-P3-150</p>
<p><b>Surface Water Management Planning</b></p> <p>Development including or in excess of 2 no. residential units or 100 sq. m. of nonresidential uses (including social and community uses)</p>	<p>Please refer to the Engineering Report prepared by Malone O'Regan which details the surface water management proposed as part of the project.</p>

Standard	Development Response
All developments with surface water implications which fall within these thresholds will be required to prepare a SWMP as part of their project design process.	

## 8. ENVIRONMENTAL ASSESSMENTS

### 8.1 Environmental Impact Assessment

An Environmental Impact Assessment (EIA) Screening report was prepared by MacCabe Durney Barnes to accompany this Part 8 application. It 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 concluded that an environmental impact assessment report is not required.'*

### 8.2 Appropriate Assessment

An AA Screening Report has been prepared by NM Ecology and accompanies this application. The report concludes:

*"In Section 3 of the OPR guidance (OPR 2021), it is stated that the first stage of the AA process can have two possible conclusions:*

**1. No likelihood of significant effects**

*Appropriate assessment is not required and the planning application can proceed as normal. Documentation of the screening process including conclusions reached and the basis on which decisions were made must be kept on the planning file.*

**2. Significant effects cannot be excluded**

*Appropriate assessment is required before permission can be granted. A Natura Impact Statement (NIS) will be required in order for the project to proceed.*

*Having considered the particulars of the proposed development, we conclude that this application meets the first conclusion, because there is no likelihood of significant impacts on any European sites. This is based on three key conclusions:*

- *The Site is not within or adjacent to any European sites, so there is no risk of direct effects*
- *There are no surface water (or other) pathways linking the Site to any European sites, so there is no risk of indirect effects*
- *Habitats within the Site are unsuitable for any of the birds associated with nearby SPAs.*

*Appropriate Assessment Screening must consider the potential implications of a project both in isolation and in combination with other plans and projects in the surrounding area. An 'in-combination effect' can occur when a project will have a perceptible but non-significant residual effect on a European site (when considered in*

isolation), that subsequently becomes significant when the additive effects of other plans and projects are considered. However, as the proposed development poses no risk of impacts on European sites in isolation, the risk of in-combination effects can also be ruled out.

Therefore, with regard to Article 42 (7) of the European Communities (Birds and Natural Habitats) Regulations 2011, it can be concluded that the proposed development will not be likely to have a significant effect on any European sites. On this basis, the assessment can conclude at Stage 1 of the Appropriate Assessment process, and it is not necessary to proceed to Stage 2.

In accordance with the OPR 2021 guidance, we note that no mitigation measures have been considered when reaching this conclusion"

### 8.3 Preliminary Ecological Appraisal

A preliminary Ecological Appraisal accompanies this Part 8 application prepared by NM Ecology. The report concludes:

*"As the Site is of low baseline ecological importance and no ecological impacts are currently envisaged, it is not necessary to carry out an Ecological Impact Assessment. This Preliminary Ecological Appraisal may be included in the Part 8 application to demonstrate that ecological features have been considered. Screening for Appropriate Assessment is provided in a separate document. As noted above, the proposed development is likely to provide a net gain in biodiversity (subject to the landscape proposals), and thus complies with Policy GI 16 of the Dublin City Development Plan."*

### 8.4 Flood Risk Assessment

A Desktop Flood Risk Assessment has been prepared by Malone O'Regan. The purpose of the Flood Risk Assessment (FRA) is to assess the potential flood risk to the proposed development site and to assess the impact that the development as proposed may or may not have on the hydrological regime of the area in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). The study was principally focused on examining flooding risks to the proposed site from the River Poddle and River Liffey.

The analysis and flood zone delineation undertaken as part of this DFRA indicates that the proposed site is not expected to be impacted during the occurrence of a 0.1% AEP (1 in 1000 year) fluvial flood event. In consideration of the assessment, analysis and recommendations, the overall development of the site is not expected to result in an adverse impact to the existing hydrological regime of the area or to result in an increased flood risk elsewhere.



## 9. CONCLUSIONS

In summary, the proposed development is for social housing on zoned lands under the control of Dublin City Council. The proposed development consists of apartments with landscaped areas, community, arts and cultural space.

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this site. This statement accompanying this Part 8 application demonstrates that the proposed development is consistent with the national, regional and local planning policy framework and that the proposal will provide for an effective and efficient use of this site which is highly accessible and well served by public transport.

The proposed development will make a positive contribution to the consolidation of the urban fabric in Dublin 8, particularly as it reuses the site of the Dublin Road Maintenance Depot for residential development. It will generally improve the outlook of the area, particularly along Forbes and Marrowbone Lane. The housing mix is reflective of the housing needs of area L and will make positive contributions to meeting the demand for homes in the area.

The proposed development will contribute to a diversification of housing tenure in the Liberties and make a positive contribution to the area owing to the provision of high quality landscaping along Marrowbone Lane and Forbes Lane and community, arts and cultural space.



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