

# Planning Statement

Social Housing Bundle 4, Development at Croke Villas,  
Sackville Avenue

Dublin City Council

*July 2024*



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# 1. INTRODUCTION

## 1.1 Background

This planning report was prepared by MacCabe Durney Barnes on behalf of the National Development Finance Agency (NDFA) and Dublin City Council, to accompany a Part 8 proposal of 52 no. residential units on a site of circa 0.88 hectares in area, located at Croke Villas, Sackville Avenue, Dublin 3.

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 1000 homes as part of Social Housing Bundle 4 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 NDFA as financial advisor, procuring authority and project manager.

The current bundle No. 4 includes eight sites, all 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 Croke Villas site includes apartment units only. 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 52 no. residential units and 152 sqm of internal community, arts and cultural facilities at a site, c. 0.88 ha located at Croke Villas, Sackville Avenue, Dublin 3.

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

Sackville Avenue is located approximately 1.5km from the City Centre. The area is predominately residential in nature with parks, local retail and community/ sporting facilities also populated across the area. The subject site is an infill site situated on the southern side of Sackville Avenue between Ballybough Road and Croke Park/ Ardilaun Square. An emergency access for Croke Park is located along Ardilaun Road. The GAA National Handball Centre bounds the application site and existing residential units bound the southern, western and eastern boundary of the site. The residential units are in the form of two storey terraced housing. The application site is part of a wider residential regeneration project that includes the provision of new terraced houses to the north side of Sackville Avenue. To the east of the site, under 3435/17 and 3789/20 Part 8 plans for residential units were approved by Dublin City Council. The total site area is 0.88 ha.

The site is situated to the north to the Royal Canal and adjoining railway line at Ballybough and includes Sackville Avenue to the north and an area of Ardilaun Road and Ardilaun Square to the west. The site is bounded to the south by the Irish rail lands and railway line and to the southeast by the rear gardens of existing houses at Sackville Gardens and part of an associated laneway adjoining these.

Sackville Gardens is a small cul-de-sac of six late Victorian houses, built in or around 1850, which lies to the eastern boundary of the site, facing the railway line and canal bank. The houses are two storeys over basement, with cellars running underneath the roadway. It is a narrow road, some four metres in width. The only paved footpath is on the side adjacent to the houses. On the opposite side, there is no footpath but there is a wall which forms the boundary with the railway.

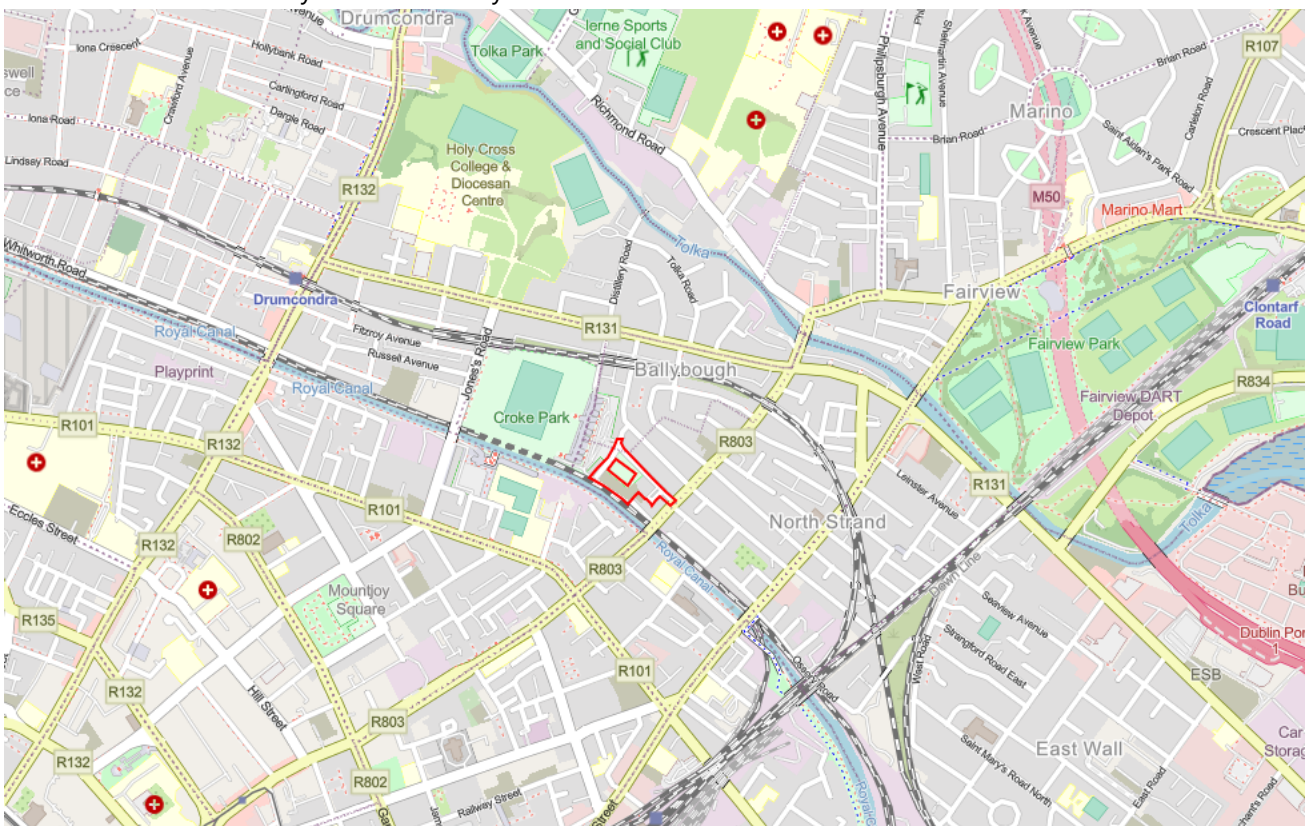


Figure 1: Site Location

## 2.2 Site Description

The site formerly consisted of the four no. five-story residential blocks constructed in the 1960s by Dublin Corporation at Croke Villas and adjoining roadways at Sackville Avenue and Ardilaun Road. The three blocks fronted onto Sackville Avenue and one onto the canal bank, with a gap, previously occupied by a hard surfaced playing pitch, between this area and no. 6 Sackville Gardens. Part of the original estate lands were disposed of to the GAA to develop the GAA National Handball Centre. Under Planning Application Reference number 2946/16 approval was granted in respect of demolition of remaining four flat blocks at Croke Villas, known as nos.1-21; 22-42; 43-63 and 64-79 Croke Villas. One of these buildings currently remain on site, which is vacant and unoccupied with the doors and windows boarded. It is anticipated that demolition works of this remaining structure will commence prior to the commencement of development of this subject application.

A palisade fence above a low wall has been erected at the western end of Sackville Gardens to form a cul-de-sac. The site is vacant and has been fenced off with metal fencing. To the southwest, the site extends to a c 2.5m high rendered block boundary wall at the top of the railway line embankment. The southeastern boundary is formed by the rear gardens and access laneway of the 2 storey over basement houses on Ballybough Road and Sackville Gardens. Beyond the application boundary to the northwest are 2 storey dwellings on Ardilaun Square with Croke Park to their rear. To the northeast on the opposite site of Sackville Avenue are vacant lands, the site of former dwellings, now demolished.

The application site boundary also includes Sackville Avenue, Ardilaun Road, Ardilaun Square and the paved and tarmac apron in front of the handball alley. The pavement and road materials along Sackville Avenue, Ardilaun Square, Ardilaun Road and Sackville Gardens include various materials road and pavement materials, and the Sackville Avenue includes traffic calming measures in the form of speed bumps. There is an approximate 2m level difference between the southeast and northwest corner of the site. The area where the apartment blocks are proposed is brownfield, and currently made up of a combination of grass and a levelled rubble/rock fill from the demolition of the former blocks.





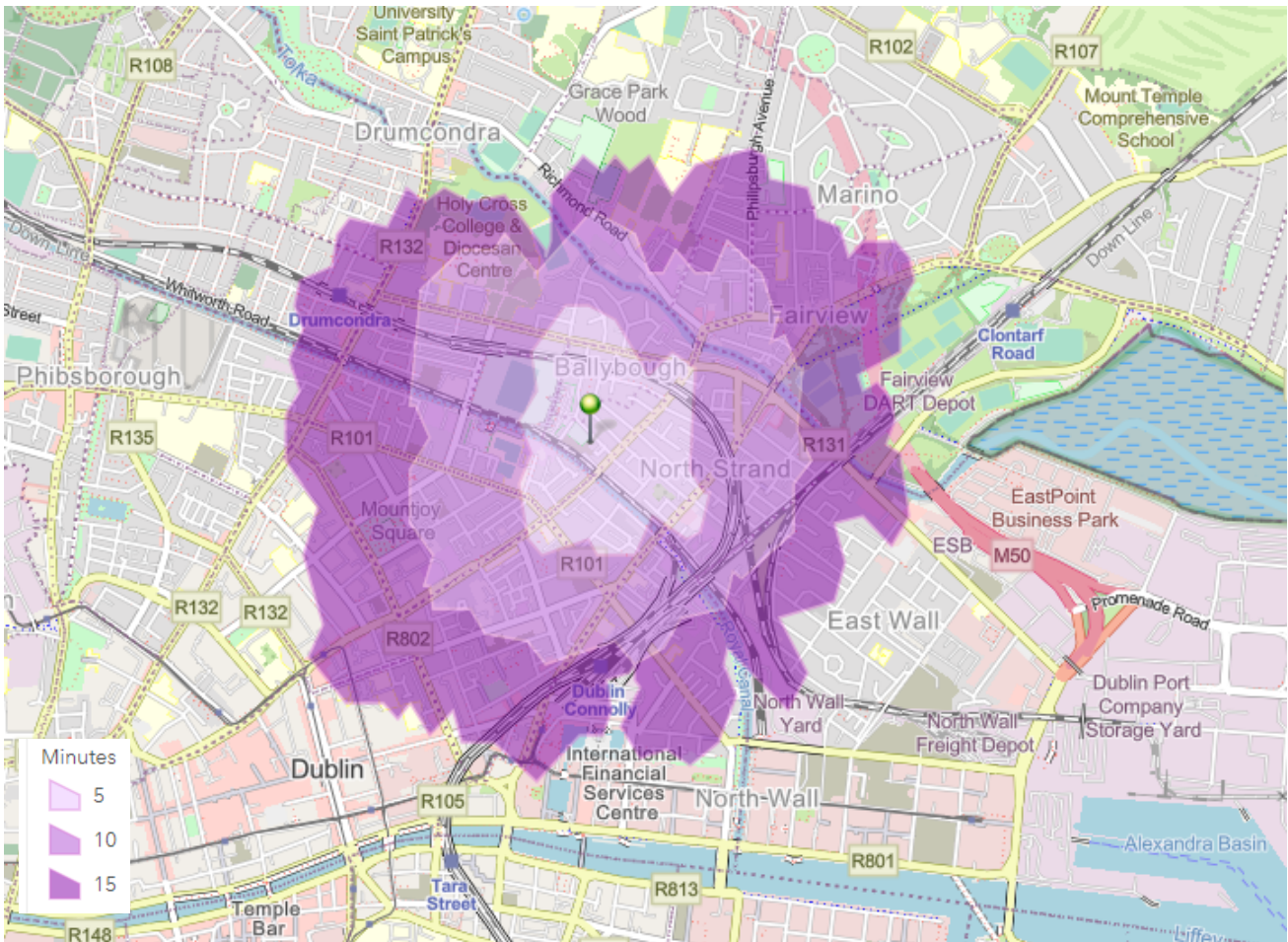
**Figure 2: Site Context**

## 2.3 Transportation

The site is served by Bus stop no. 500 and Bus Stop no. 510 along Ballybough Rd Main with Dublin Bus route 123 serving these stops. Route 123 serves travel between Marino towards Walkinstown (Kilnamanagh Rd). In general services operate every 12 minutes during the weekdays, c. 15 minutes on Saturdays and c.30 minutes on Sundays. 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 household 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 3: 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 site is located in close proximity to a range of routes, in particular, the no. 73 route is proposed to travel along Ballybough Road and will terminate at the Abbey St/ Talbot St interchange. In addition, the H Spine and D Spine will run along North Strand Road, which is c. 5 minute walk from the subject site. The D Spine serves travel between Malahide Road-City Centre- Crumlin and the H Spine will serve travel between Howth Road-City Centre.



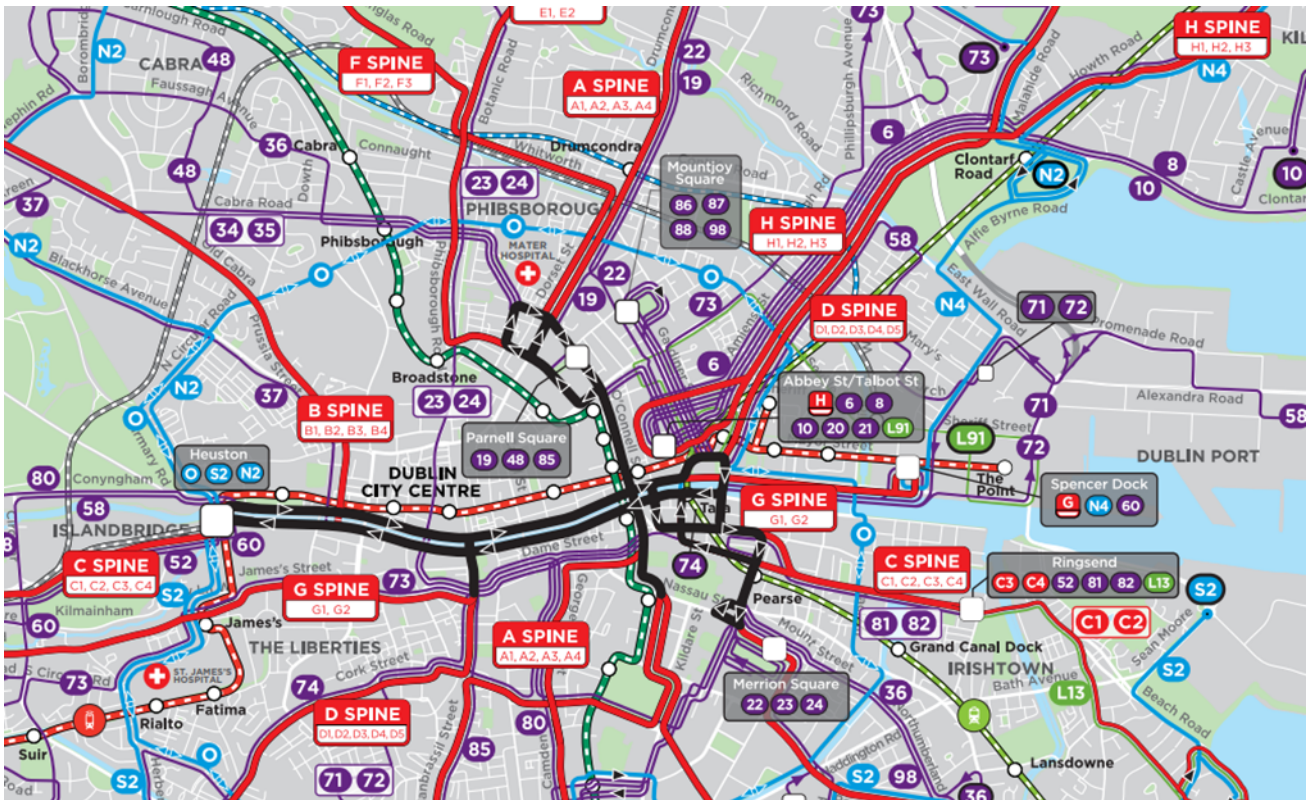


Figure 4 Dublin City Centre BusConnects Map (Source: NTA, 2022)

### 2.3.3 Train

The site is located proximate to rail stations such as Drumcondra Station and Connolly Station. Drumcondra Station is located c. 800m from the subject site, which provides services for the western commuter line and South Western commuter line. While Connolly Station is located within 800m from the subject site and provides services for the South Eastern, Dart, Northern commuter, Western commuter and South Western commuter train. Connolly Station also provides access to the Luas red line. The rail network within the surrounding area of the site is illustrated below.

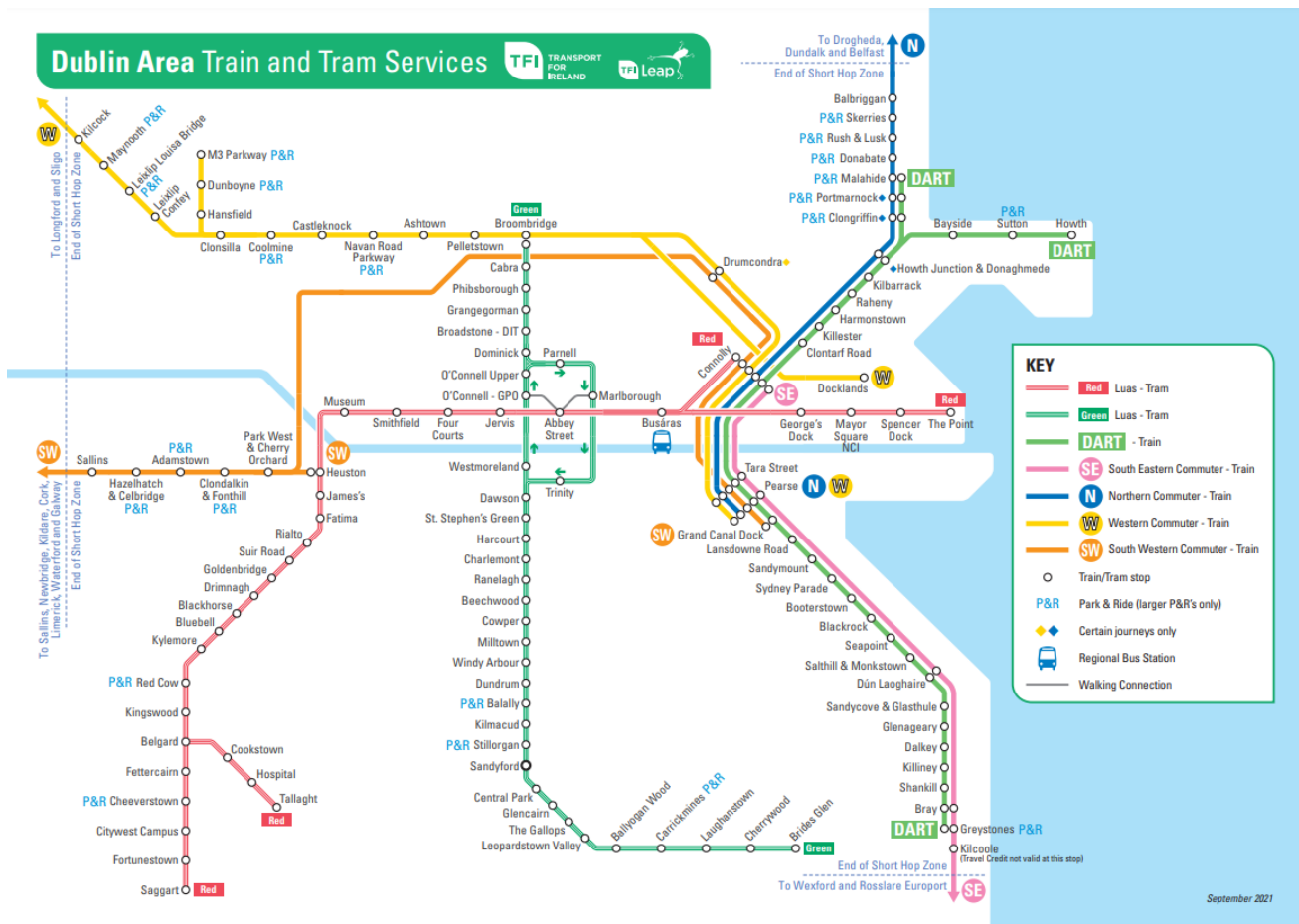


Figure 5: Dublin Area Train and Tram Services (Source: Transport for Ireland, 2021)

### 2.3.4 Cycling

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 identified in this report. The site is in close proximity to the Clontarf to City Centre cycle network route.

The proposed cycle network surrounding the development is shown below, with the closest Primary Route:

Primary Route 2A:

- Route 2A is a branch from Primary Route 2 that starts at Drumcondra Road. Route 2A connects from Dorset Street – Bolton Street/ Henrietta Street Junction. • Primary
- Route 1: From Fairview – North Strand – Amiens Street – Beresford Place – Matt Talbot Bridge.

The closest secondary routes are:

- Secondary Route 1D: Route 1D provides an alternative link to the northern part of the city centre from Fairview via Ballybough and Summerhill to Parnell Square.
- Secondary Route 2B: Route 2B is also a branch from Route 2 that starts at Clonliffe Road to Beaumont Hospital via a new bridge over the River Tolka to Richmond Road, Grace Park Road and Beaumont Road.

There are four orbital routes in Dublin North Central that provide cross-links between the radial routes and give access to destinations within this sector. Route NO2, also known as Tolka Valley Route, is an orbital route benefitting from the site. The route starts at Ballybough to Drumcondra, Glasnevin and Finglas South.





Figure 6: Proposed Cycle Network (Source: NTA)

### 3. RELEVANT PLANNING HISTORY

#### 3.1 Site History

The following site planning history is of relevance to the subject proposal.

##### 3.1.1 PA. Reg. Ref. 2946/16

Under PA. Reg. Ref. 2946/16 a Part 8 was granted in respect of demolition of remaining four flat blocks at Croke Villas, known as nos.1-21; 22-42; 43-63 and 64-79 Croke Villas. Three blocks on the site have been demolished to date, with nos. 43-68 Croke Villas, still remaining in site. Although, the block is vacant and unoccupied. It is anticipated that the remaining demolition works permitted under this Part 8 application will be completed prior to the commencement of works under this application. The application was granted in October 2016.



Figure 7: Proposed Demolition Plan (Source: DCC)

##### 3.1.2 PA. Reg. Ref. 3857/17

A Part 8 planning application was lodged on 15th September 2017 under PA. Reg. Ref. 3857/17 comprising the following works:

- The clearance of walls and perimeter fencing at Sackville Gardens, Sackville Avenue, Ardilaun Square and Ardilaun Road at the Croke Villas site, the clearance of an existing wall along the boundary between Croke Villas and Irish Rail lands, the construction of a new boundary wall/ fence adjacent to Irish Rail lands with

new pavement treatments, carriageway, trees, lamp standards, planters and ancillary works along a proposed extension of Sackville Gardens.

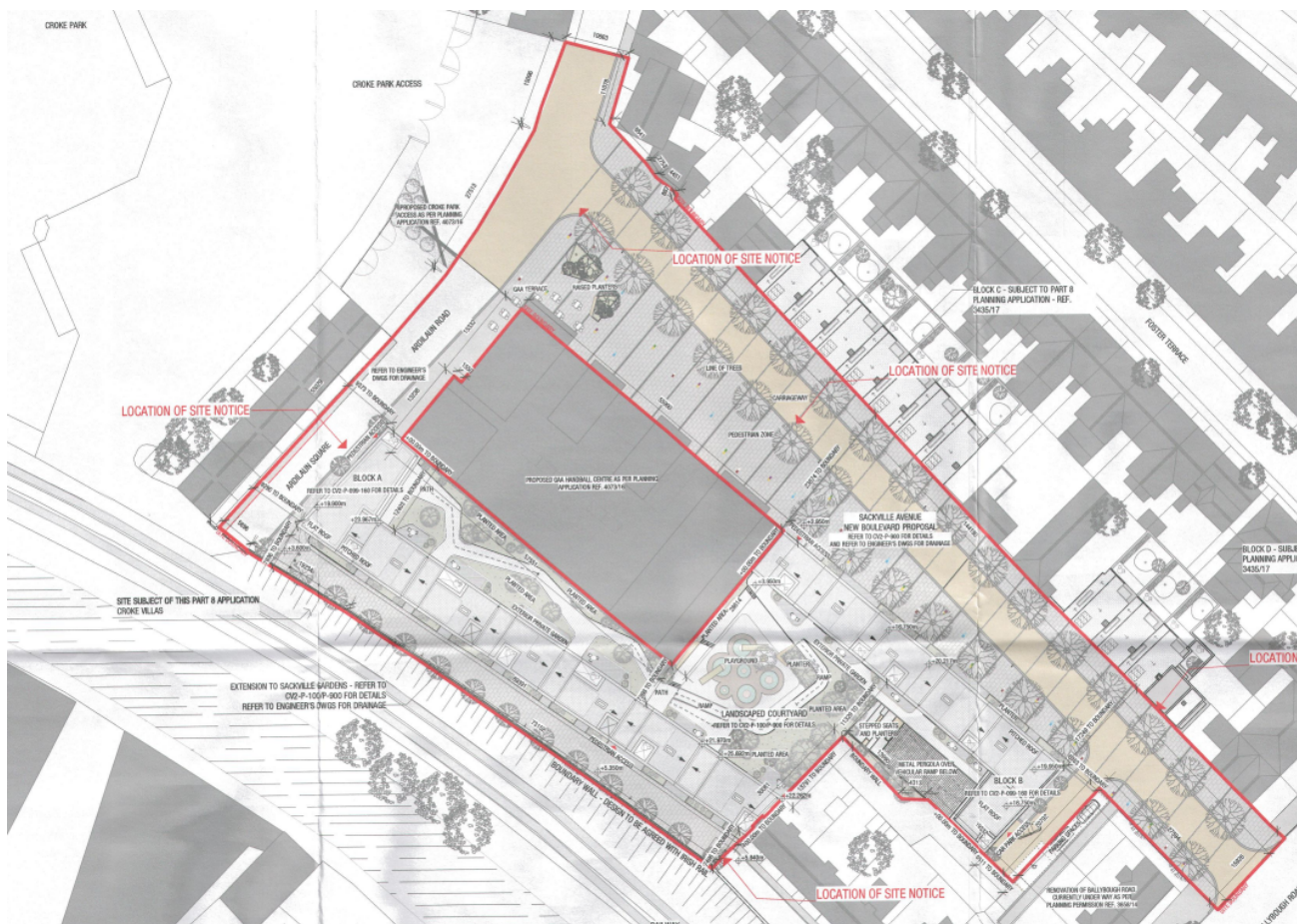
- The construction of a new Boulevard on Sackville Avenue from the junction with Ballybough Road to Croke Park Stadium, comprising new pavement treatments, carriageway, trees, lamp standards, planters and ancillary works.
- The upgrading of pavement finishes, carriageway, street lighting and ancillary items along Ardilaun Road and Ardilaun Square.
- The construction of 61 no. apartments in two blocks, Block A along proposed extension of Sackville Gardens and Block B along Sackville Avenue. Area - Block A circa 3355 sq.m, Area - Block B circa 1849 sq.m; with underground parking garage containing parking for 36 cars and 54 bicycles, ancillary plant rooms and storage room, accessed off Sackville Avenue, area circa 1520 sq.m; and ancillary perimeter walling to car park ramp.
- Block A is five storeys high along the proposed extension to Sackville Gardens and Ardilaun Square and comprises 2 no. 3 bed apartments on two levels, 1 no. 2 bed apartment on two levels; 27 no. 2 bed apartments, 7 no. 1 bed apartments and 1 no. studio apartment; Block B is four storeys high along Sackville Avenue and the access road to underground car park, and comprises 1 no. 3 bed apartment on two levels, 9 no. 2 bed apartments, 12 no. 1 bed apartments and 1 no. studio apartment.

Numerous submissions were received by local residents in the vicinity of the site, the issues raised can be summarised as follows:

- Observers were unable to find an EIA, or an EIA Screening in respect of the proposed development.
- It was considered that the redevelopment of Croke Villas offered an opportunity to incorporate a station which could also enable greater building density at this location.
- Issues related to crowd movement and procedures during any emergencies.
- Overbearing height and proximity of Block "A".
- Public notices fail to refer to the proposal to use Sackville Gardens as a secondary emergency route to private recreational and commercial developments.
- Public safety and emergency vehicle access.
- Design statement fails to fully and fairly address the architectural heritage, residential amenity and cultural and historic value of the area, including its visually important relationship with the Royal Canal Conservation Area.
- Failure to produce masterplan or statutory LAP for approval by the Members, it is believed that the Planning Authority has thus indulged in "cherry-picking" the SDRA and failed to use statutory provisions for prior public consultation. It was further noted that the proposal was premature in the absence of a masterplan or LAP proved by Local Representatives.

This permission was approved by Dublin City Council on 4<sup>th</sup> December 2017. An illustration of the proposed layout is shown below.





**Figure 8: Permitted Site Layout under PA. Reg. Ref. 3857/17**

The principles of permitted development under PA. Reg. Ref. 3857/17 have largely been retained in the subject proposal. However, the previously permitted basement with its parking, plant and ancillary spaces is omitted in this application.

Following the grant of permission, Judicial Review proceedings were initiated under [2020] IEHC 507 in respect of the approval for 3857/17. In summary, the applicants’ grounds included:

- The CEO’s report largely mirrors the planner’s report and other than a recitation of the observations submitted by him on behalf of these applicants in advance of this report and has not properly assessed any of them.
- Absence of reports online or on file in the planning registry.
- Failure of the CEO report to properly deal with his observations submitted on behalf of the applicants.
- Failure to have regard to the cellars running from the houses in Sackville Gardens which would have additional traffic imposed upon them.
- The narrowness of the width of Sackville Gardens which is assessed at four metres wide.
- The lack of consultation with or from the conservation and heritage officers.
- The lack of proper consideration at the designation of Sackville Gardens as a route for emergency vehicles.
- No evidence on file of any screening decision for an Environmental Impact Assessment having been made. The impact and potential of the cumulative effect arising from multiple recent development consents in the same area or development envelope (para 51).

- Issues with regard to the absence of appropriate traffic considerations with regard to the “secondary emergency access” route through Sackville Gardens.
- That by treating each development proposal separately, that each has managed to fall into sub threshold development. With regard to that, it’s complained that there is a failure to conduct a screening exercise in order to establish whether an Environmental Impact Assessment is warranted for this development.
- Complaints concerning certain potential changes to the route incorporating Sackville Gardens with various other access routes within the areas.

DCC successfully defeated the judicial review and the subject Part 8 permission stands.

### 3.2 Surrounding Area

The following planning history in the surrounding area is of relevance to the subject proposal:

#### 3.2.1 PA. Reg. Ref. 3435/17

Immediately adjoining the site along Sackville Avenue, a Part 8 application was approved under PA. Reg. Ref. 3435/17 for works comprising the demolition of six derelict houses and the clearance of two vacant sites including walls and perimeter fencing at 20-28 Sackville Avenue, and the construction of eleven houses as follows: seven no. two storey, three bedroom terraced houses, area circa 784m<sup>2</sup>, at Site C on the north side of Sackville Avenue, clearance of walls and perimeter fencing on a vacant site at 33-34 Sackville Avenue and the construction of three no. two storey, three bedroom terraced houses and adjoining one no. three storey bedroom house at Site D, also on the northside of Sackville Avenue, area circa 441m<sup>2</sup>, including undesignated on-street car parking. The below drawing illustrates the permitted development.

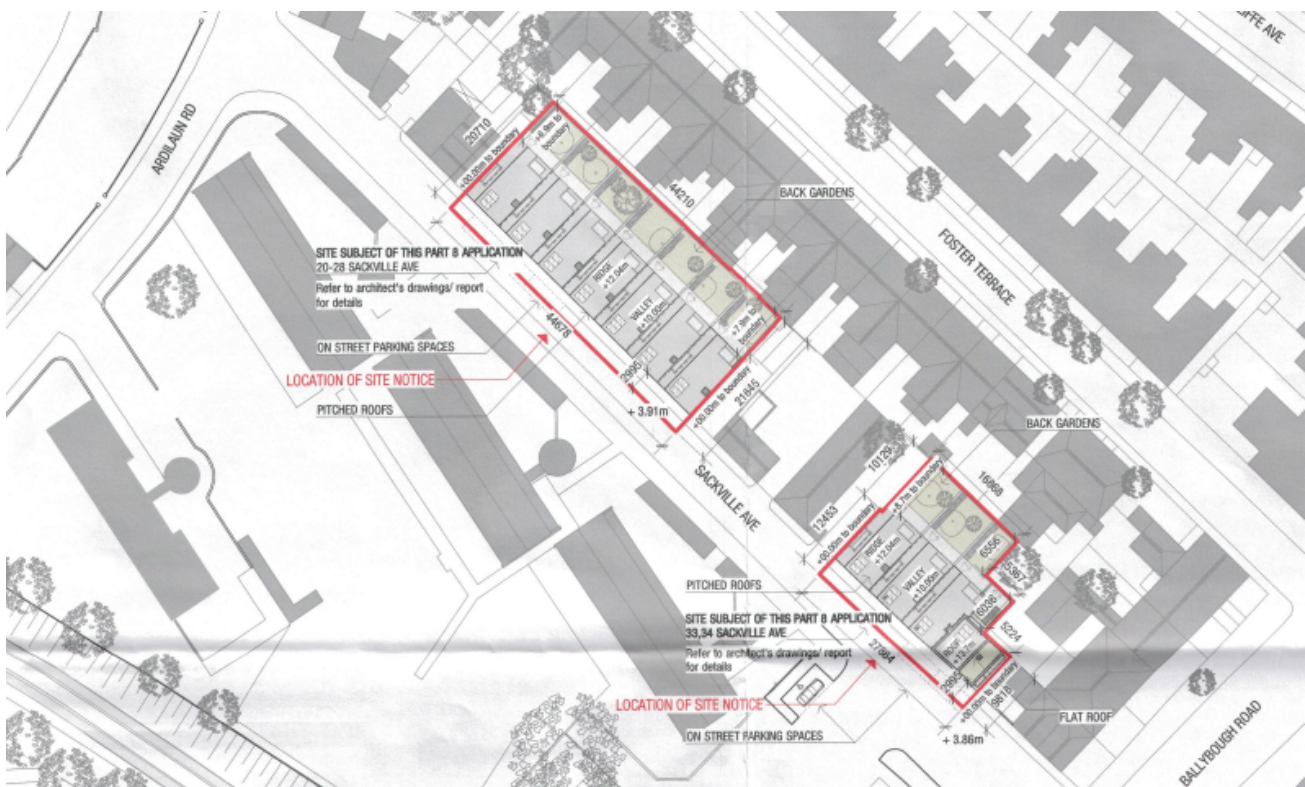
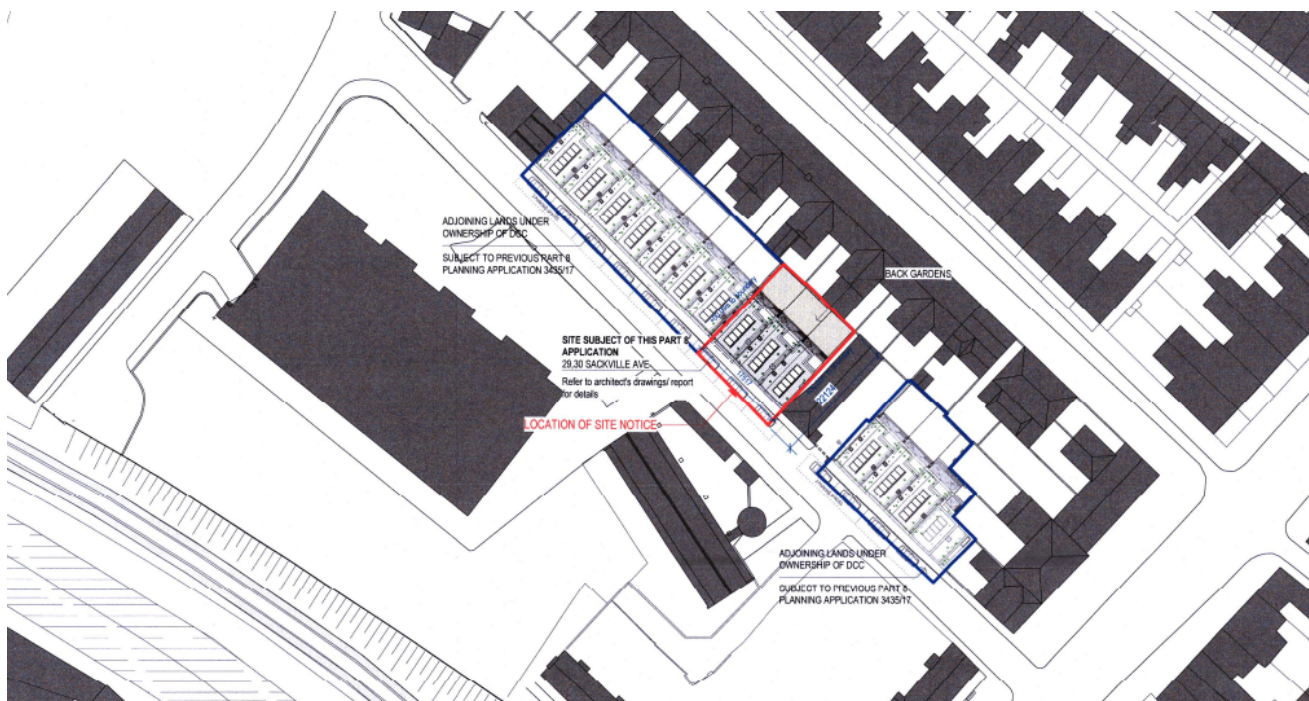


Figure 9: Permitted Site Layout Under PA. Reg. Ref. 3435/17



### 3.2.2 PA. Reg. Ref. 3789/20

Also, immediately adjoining the site along Sackville Avenue a Part 8 application under PA. Reg. Ref. 3789/20 was approved in January 2021. The works comprise the demolition of an existing derelict house and ancillary structures and the construction of three, two storey, three bedroomed terraced houses with private rear gardens and new connections to the existing drainage infrastructure. Car-parking will be provided via undesignated on street spaces to the front of the dwellings. The site area 380m<sup>2</sup> and the area of the proposed development is 301m<sup>2</sup>. The below drawing illustrates the permitted site layout.

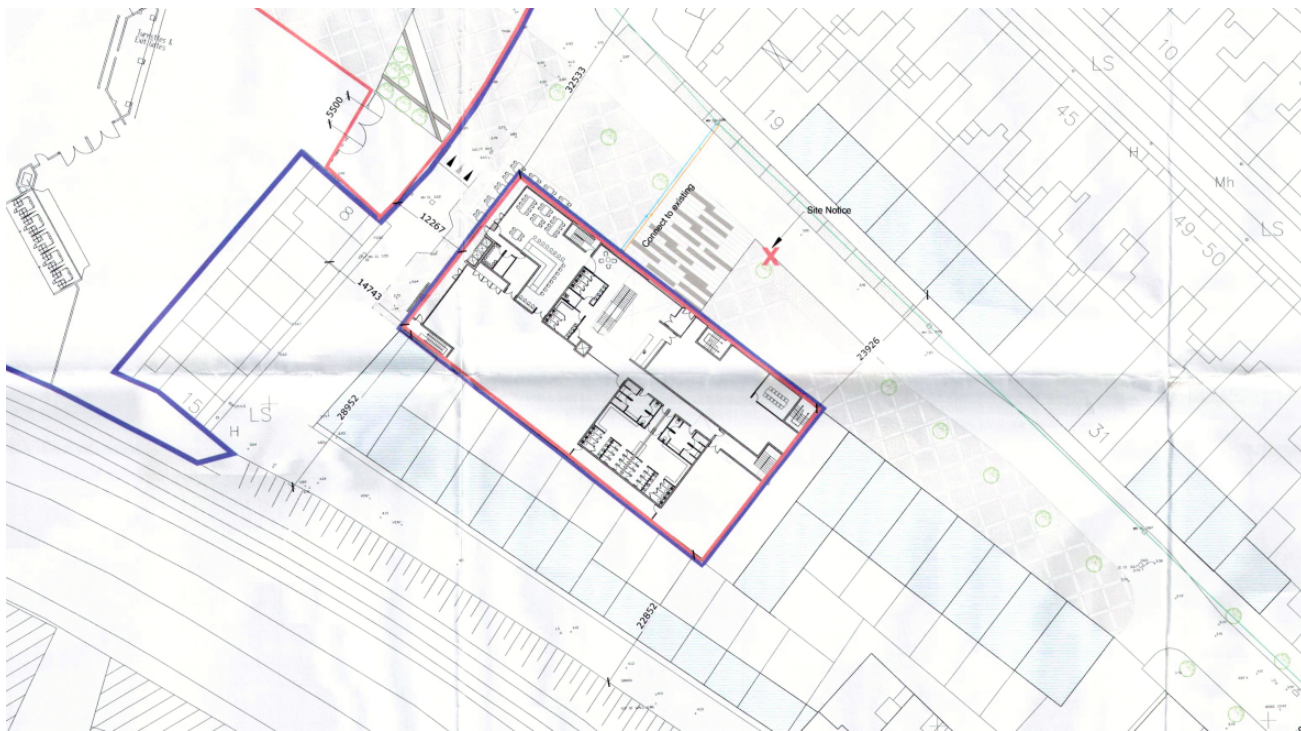


**Figure 10: Permitted Site Layout under PA. Reg. Ref. 3789/20**

The undesignated car parking permitted under PA. Reg. Ref 3435/17 and PA. Reg. Ref. 3789/20 is noted. This Part 8 application includes Sackville Avenue, and it is proposed to construct a new boulevard along this street with associated landscaping. Therefore, under this application, the undesignated parking along Sackville Avenue will be removed.

### 3.2.3 PA. Reg. Ref. 4073/16

Permission was granted under PA. Reg. Ref. 4073/16 at Ardilaun Road and Sackville Avenue, Dublin 3 on 21<sup>st</sup> March 2017 for the demolition of turnstile and single-storey ticket collection building, Nos. 1-8 Saint Andrew's House on Ardilaun Road, the construction of a 3,307sqm 2-storey handball centre to include 7 no. handball courts together with community centre, bar and restaurant space, and ancillary offices on Sackville Avenue. It was also proposed to construct a separate standalone 565sqm 2-storey museum building with external steps to be used as seating gallery to also include gift shop and offices within the grounds of Croke Park Stadium, together with a new entrance wall and gate to Croke Park Stadium, Jones Road, all with associated works including bicycle stands and drainage at Ardilaun Road and Sackville Avenue, Dublin 3.



**Figure 11: Permitted Site Plan (Source: SSA Architects)**

The GAA National Handball Centre has since been constructed and is operational. Currently there are a number of bicycles stands fronting the centre, which under this subject application, will be relocated to tie in with the proposed landscaping works fronting the Handball centre.

In addition to these permissions identified in the immediate vicinity of the site, the following permissions are also noted:

**Table 1: Permissions in Surrounding Area**

PA. Ref	Applicant	Location	Summary	Decision
3197/24	The Trustees (Ned Quinn & JJ Carroll), for and behalf of the GAA	Hill End of Croke Park, St. Joseph's Avenue, Dublin 3	Consisting of modifications to PA. Reg. Ref. 2644/19 to include substitution of a 27.8m reinforced concrete wall incorporating a 9m long gated opening construct a new 12.7m long reinforced concrete wall between gates A9 and A10, a new galvanised steel fence and double gate between the Handball Centre site and the outer Cusack car park, and a new 5 sqm security hut at the end of St Joseph's Avenue along with 2 No. automated boom barriers. The new enclosure will accommodate 8 No	Additional Information was submitted 19/06/24

PA. Ref	Applicant	Location	Summary	Decision
			EV charging stations and bicycle parking for 52 bicycles.	
LRD6009/23-S3	St. Vincent's Hospital Fairview	St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3	Redevelopment of the site to provide for a new hospital building, providing mental health services, provision of 9 no. residential buildings and community facilities, and public open space.	Granted permission 11 <sup>th</sup> October 2023
LRD6015/22-S3	Banner A Cuig Limited	61 & 63 Fairview Strand, 59A Fairview Strand, at Warehouse on Esmond Avenue,, at 19 Esmond Avenue and 21 Esmond Avenue and at rear 19 Philips Avenue, Fairview, Dublin 3	The development (Large Scale Residential Development) will consist of provision of 114 apartments [57 no. one bedroom; 11 no. two bedroom (3 person); 44 no. two bedroom (4 person); 2 no. three bedroom] and 4 commercial units with a total combined gross floor area (excluding basements) of 9,456.15 sqm)	Granted permission 5 <sup>th</sup> May 2023
LRD6006/23-S3	Malkey Limited	158A, The former Leydens Wholesalers & Distributors, Richmond Road, Dublin 3, D03 YK12	the demolition of existing industrial structures on site (c. 3,359 sq m) and the construction of a mixed-use development including artist studios (c. 749 sq m), a creche (c. 156 sq m), a retail unit (c. 335 sq m), and a gym (c. 262 sq m), and 133 No. residential units (65 No. one bed apartments and 68 No. two bed apartments).	Granted permission 31 August 2023
4276/22	Pat Broughal	Richmond Cottages North, to the rear of 611-617 North Circular Road, Dublin 1	demolition of the existing unoccupied single storey shed-like rear buildings, and (ii) the construction of 5 no 3 storey 2 bedroomed townhouses with rooftop terraces, to be accessed from Richmond Cottages North. Also proposed is the provision of a communal plant room with PV panels over, bicycle parking and refuse storage facilities, as well as a communal garden/allotment area.	Granted permission 25 <sup>th</sup> January 2023
2656/21	Lidl Ireland GmbH	20 to 22 (former Annesley Motors), 22B, 23, 24, 25, and	The construction of a two storey (including mezzanine floor), neighbourhood centre development with a gross floor area	Granted permission 5 <sup>th</sup> April 2022



PA. Ref	Applicant	Location	Summary	Decision
		26, Ballybough Road, Dublin 3	totalling 2,391 sqms. The site area extends to circa 0.28 hectares. At ground floor, the proposed development includes three units (unit 1 – retail; unit 2 – retail/café; and , unit 3 – retail); undercroft parking for 29 cars and 16 external spaces; secure cycle store.	

## 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 utilised to meet some of the demand for social housing arising in Dublin City and particularly the Ballybough area. Ballybough is a well-established residential area with a number of underutilised land banks. The subject lands have been subject to Part 8 approval previously under PA. Reg. Ref. 3857/17. Due to viability issues arising in respect of this permitted development, the proposed development seeks to retain a similar proposal and design while also ensuring the financial viability and deliverability of the proposed development.

There are no impediments to proceeding with the site. Site selection was restricted to consideration of that land in the ownership of the Dublin City Council and which could be adequately serviced and integrated to provide much needed social housing. 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. The proposed development is located in the SDRA 10 North East Inner City. The site is zoned Z1 Sustainable Residential Neighbourhood.

The site is located in close proximity to shops and community facilities 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 Type

The provision of social housing units on this site, will facilitate diversity in tenure and facilitate housing mix in the inner city. Analysis of the existing housing tenure and stock within a 1km radius of the site were undertaken to contextualise the proposed housing tenure and type of accommodation designed at the subject site.

The area is dominated by private housing with over 75% either rented or owned according to the 2022 census of population. Just 14% of the housing stock consist of housing rented either from the local authority or from a voluntary body. With the provision of 52 units, the share of social housing in the overall stock in the area would give rise to a minor uplift in the overall social housing stock in the area.

The site is located in area H of the Council's Housing Waiting List. Data from October 2023 shows that there are 47 households requiring band 1 housing (the highest priority), 810 in band 2 and a further 543 in band 3, or a total of 1400 households. A further 1537 are on the transfer waiting list for area H. With a combined total of 2937 households, there is a strong demand for accommodation in the area. It is also important to note that around 646 of these households have been on the list for over 10 years.

The housing waiting list for area H shows strong demand for one-bed and two-bed units, with 65% of the list requiring a one-bed unit and 22% requiring two bed units. In this regard, the proposed development will positively respond to housing need in the area with a balanced unit mix proposed to cater for the strong demand across these particular units mix requirements.

The site is located in one of the two sub-City Housing Needs and Demand Assessment (HNDA), the Dublin 1 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 H, 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 puts the emphasis on 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 Croke Villas 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

A public consultation event was held on 8<sup>th</sup> February 2024 in respect of the proposed development. Attendees at the event included members of the public, DCC Housing Development representatives, Local Area officers and the Design Team architects.

Consultations took place between the project team and Irish Rail during the design development process. Irish Rail confirmed that a 2.4m high secure boundary is required along the rail line and that no trees or planting are permitted in this zone.

## 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 of place for future residents, whilst integrating into the existing built environment. The layout is particularly derived from the infill nature of the site and the existing permission on the site. The principles of development permitted under PA. Reg. Ref. 3857/17 have largely been retained in the subject proposal.

The approved development at this site consisted of 2 no. apartment blocks with a total of 61 no. apartments (2 no. studios, 19 no. 1 bed, 37 no. 2 bed and 3 no. 3 bed units). The unit mix of the proposed development have been revised to reflect the current housing needs of the area based on information derived from the Dublin City Council housing waiting lists.

Due to financial visibility issues with the approved development on the subject lands, it is necessary for a new proposal to be designed and submitted for Part 8 approval. The scheme was selected as a site in the SHB4 PPP in order to progress the redesign of the development and secure financing for the scheme.

The proposed design comprises two L-shaped blocks with a courtyard communal open space for residents to utilise in between both blocks. The placement of these blocks forms a new relationship with the street to create a strong new edge along both Sackville Gardens and Sackville Avenue. The proposal also entails the construction of a new boulevard along Sackville Avenue. In addition, it is intended to form a new street by extending Sackville Gardens mainly for pedestrians, but it is envisaged that this would also be utilised for emergency services. This street will continue along the boundary to the Irish Rail lands towards Ardilaun Square, creating a new permeability link for pedestrians and cyclists throughout this area.

## 6. PROPOSED DEVELOPMENT

### 6.1 Project Description as per public notice

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

Notice is hereby given of the construction of 52 no. apartments on a site c.0.88 ha at Croke Villas, Sackville Avenue, and bounded by Ballybough Road, Sackville Gardens, Sackville Avenue, Ardilaun Square, Ardilaun Road and GAA National Handball Centre, Dublin 3, which will consist of the following:

- Clearance works at the site will comprise the removal of walls and perimeter fencing and an allotment garden at the Croke Villas site bounded by Ballybough Road, Sackville Gardens, Sackville Avenue, Ardilaun Square, Ardilaun Road and GAA National Handball Centre. A wall along the boundary of the site and Irish Rail lands and railway line (to the south) will also be removed and replaced with a new boundary wall. Demolition of the remaining Croke Villas flat block is approved under Planning Authority Reg. Ref. 2946/16.
- Construction of two apartment blocks between 4 to 5 storeys, consisting of a total of 52 no. residential units:
  - Block A consists of 35 no. residential units (1 no. 1 bed and 34 no. 2 bed apartments); and
  - Block B consists of 17 no. residential units (4 no. 1 bed and 13 no. 2 bed apartments) and 152 sqm of internal community, arts and cultural space at ground floor.
- 4 no. car parking spaces and 129 no. cycle spaces.
- Sackville Gardens street will be extended to join with Ardilaun Square to form a new perimeter street to the southern edge of Block A, which will function as a new pedestrian and cycle link and also serve as an emergency vehicle access.
- Removal of undesignated car parking spaces along Sackville Avenue and construction of a new Boulevard on Sackville Avenue from the Ballybough Road junction to Ardilaun Road, which will also facilitate vehicular access.
- Provision of c. 961 sqm public open space, c.500 sqm communal open space, c.367 sqm private open space and 68 sqm of outdoor community, arts and cultural space (55 sqm facing Sackville Avenue and 13 sqm in internal courtyard).
- Boundary treatments, public lighting, site drainage works, road surfacing and footpaths, ESB substation, ESB meter rooms, plant rooms, stores, bin and bicycle storage, landscaping; and
- All ancillary site services and development works above and below ground.



Figure 12: Proposed Site Layout (Source: Coady Architects)

## 6.2 Detailed Description

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

Table 2: Proposal Details

Development Parameters	Summary
Parameter Site Proposal	Gross site area: 0.88 ha Net site area: 0.52 ha
No. of Residential Units (Apartments)	52
Non-residential uses:	152 sqm (4%) provided in internal space (ground floor Block B) and 68 sqm (1%) provided externally in public realm (55 sqm) and internal courtyard (13 sqm)
Density	Gross density: 59 uph Net density: 100 uph
Plot Ratio	1.50
Site Coverage	54%
Dual Aspect	100%

Development Parameters	Summary
Car Parking Overall	4 no. spaces
Bicycle Parking	Total: 129 spaces 99 no. long term spaces 30 no. short term spaces
Height	4 to 5 storeys
Public Open Space	961 sqm
Communal Open Space	500 sqm

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

**Table 3: Overall Breakdown of Units**

Unit Type	1 bed Apartment	2 bed Apartment	Total
No. of units	5	47	52
% of Apartments	10%	90%	100%

Block A consists of 35 no. residential units (1 no. 1 bed and 34 no. 2 bed); and Block B consists of 17 no. residential units (4 no. 1 bed and 13 no. 2 bed).

### 6.3 Design Rationale

The design rationale for the site stems from the infill nature of the site and the existing permission of the site. The subject site is the residual space left following the development of the GAA Handball Building. The resulting site shape requires careful consideration to develop an appropriate and sustainable housing response with amenity for residents.

The design response for the site is to propose two L-shaped blocks to create a strong new edge along Sackville Avenue and Sackville Gardens. The 2 blocks (Block A and Block B) contain apartment units and at the ground floor of Block B there is a community, arts and cultural space that can be utilised by residents of the development and the wider community. Both blocks provide passive surveillance to the internal communal amenity space in the courtyard as well as the proposed Boulevard along Sackville Avenue and the extended Street Sackville Gardens.

A key element of the proposed design is to construct a boulevard along Sackville Avenue. This development will include a green boulevard leading to the entrance of Croke Park. This streetscape has been carefully designed to integrate subtle references to the GAA, which serves as the backdrop to the site. These references include the configuration of the street trees that line Sackville Avenue, which have 15 on either side – referencing GAA having 15 players per team – and are grouped in a way that reflects the positions of players in a GAA squad.

The design of the street incorporates significant wildlife enhancements through the use of large rain gardens and a variety of native Irish tree species. These landscape features are placed strategically to allow for the movement of large numbers of pedestrians to-and-from the Croke Park stadium. The scheme also includes an

extension to Sackville Gardens in front of the proposed Block A building as well as an enhanced layout of Ardilaun Road, both of which include wildlife and visual enhancements.

The communal open space is framed neatly by the proposed Blocks A and B, as well as the existing GAA Handball Alley building. The space incorporates a dynamic system of paths and green spaces containing flexible amenities including creative play equipment integrated into the landscape, with seating areas, and natural environments of shrubs and tree planting.



## 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 Sackville Avenue and Sackville Gardens. The proposed layout caters for communal and public open space. It includes 220 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 range of community facilities combined with good public transport facilities and convenience retail and services close proximity, the provision of 52 no. homes at the location is 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. All units have been designed to be adaptable to suit the changing needs of residents. The proposed development has 31% of apartments designed to Universal Design standards.

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

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

In summary, the proposed development is on zoned lands close to shops, community, high quality public transport and shops in Dublin City and meets the NPF objectives.

### 7.1.2 Climate Action Plan 2024

The Climate Action Plan 2024 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
Standards and Regulations	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 medium residential density in close proximity to existing community facilities and amenities and in accordance with the NPF providing for compact growth.
- The application site is within walking and cycling distance to several bus routes and proposed BusConnect routes and Connolly or Drumcondra station. 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 Guidelines for Planning Authorities (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 52 no. units, 4 of which are one-bed units, falls below the 75-unit threshold set out by the Childcare Facilities Guidelines for Planning Authorities (2001). Having regard to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, one bedroom apartment units should not generally be considered to contribute to a requirement for childcare provision (and subject to location this may also apply in

part or in whole to two bedroom). Excluding one-bedroom units, 47 units may generally require childcare in the proposed development.

The Dublin Childcare Committee was consulted which identified childcare providers within a 1 km radius. The analysis of the accompanying SIA identified capacity in existing childcare facilities and a pipeline of new childcare facilities permitted in the surrounding area. Given the low yield of prospective children and the number of vacancies, it is not considered that the provision of a creche on the Part 8 site would be required.

### 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 a vacant brownfield site. The site is in a prime location within walking distance to a wide array of services and facilities. Following demolition works at the site, it has remained vacant with on remaining block in situ and steel fencing surrounding the site. The proposal seeks to enhance the biodiversity value of the site and provide a high-quality landscape.

The proposed development has been designed cognisant of adjoining heights and architectural styles. The proposed plans for a boulevard will be overlooked by the proposed residential units, thereby supporting passive surveillance.

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. The proposed development underwent a daylight and sunlight assessment to ensure that appropriate levels of daylight and sunlight are provided to the units.

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

this planning stage, consideration has been given to the external materials to buildings, boundaries, and the public realm, and outline energy and carbon reduction strategies. The materials and services proposed will be durable and will provide a long life and low maintenance requirements for the residents.

The communal open space area has been designed to ensure its maximum use by residents. The internal courtyard is clearly defined and separated from the private open space of units located at ground floor in the apartment blocks.

### 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 a SDRA, which aligns with the criteria of strategic and sustainable development locations defined under the category of City – Urban Neighbourhoods, where density shall generally range between 50-250 dph.

#### **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.*

To calculate the net site area for the purpose of the density calculation at the site, having regard to the infill nature of the site, the road network has been excluded, this equates to a net site area of 0.52 ha. With a net site area of 0.52 ha, the net residential density is calculated as 100 dph in an urban neighbourhood, the proposed development is in accordance with the Guidelines.

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 net density is 100 uph. The density also aligns with Table 1 to Appendix 1 of the Development Plan which sets out a density range of 100-250 uph for SDRA's. The proposed density therefore accords with the

Dublin City Development Plan 2022-2028 and the Sustainable Residential Development and Compact Growth Guidelines.

**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. A Quality Audit Report has been produced by ORS, which includes a Road Safety Audit, Cycle Audit, and an Accessibility Audit. The Quality Audit assessed the proposed layouts supplied by the Design Team and made a number of recommendations in line with guidance such as DMURS.

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 follows.

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 4 Summary of Design Statement Response to the Specific Criteria**

No.	Topic	Response
<b>1</b>	<b>Sustainable and Efficient Movement</b>	
(i)	permeable and legible network of streets and spaces within the site	<p>The site layout reflects the aspirations of SDRA 10 and includes for the permeability link between Sackville Gardens and Ardiluan Square as annotated in the SDRA Guiding Principles map.. As previously noted, this is proposed primarily a pedestrian and cycle route, with bollards at each end preventing regular vehicular traffic and retained both existing streets as cul de sacs. This paved surface is required for fire tender access and façade maintenance to block A and has been designed a such.</p> <p>In addition, along Sackville Avenue it is proposed to construct a new Boulevard with a high quality landscaping proposal captured in the design which incorporates the historic and cultural proximity of Croke Park. This</p>

No.	Topic	Response
		<p>development will include a green boulevard leading to the entrance of Croke Park. This streetscape has been carefully designed to integrate subtle references to the GAA, which serves as the backdrop to the site. These references include the configuration of the street trees that line Sackville Avenue, which have 15 on either side – referencing GAA having 15 players per team – and are grouped in a way that reflects the positions of players in a GAA squad.</p> <p>The site avails of good public transport connectivity with Dublin Bus stops along Ballybough Road and proximity to Connolly and Drumcondra Train station.</p>
<b>(ii)</b>	connections with and between established communities, services and other uses	<p>The proposed scheme is located within a predominately residential and neighbourhood services centre with the exception of Croke Park and associated museum and parking located in the immediate vicinity of the site. The accompanying Social Infrastructure Audit has identified a wide array of community services and amenities located in the vicinity of the site. The site is located within walking distances to Fairview and Drumcondra centres as well as the city centre. The application site is ideally located within an established area that can serve the needs of perspective residents.</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 the top of the user hierarchy, then cyclists, public transport and finally, private vehicles.</p> <p>The application site includes the construction of a new Boulevard on Sackville Avenue and the creation of a new pedestrian and cyclist access route along Sackville Gardens, which will also serve as an emergency vehicle route. The proposed new pedestrian link along Sackville Gardens towards Ardilaun Road has been earmarked for the delivery under the SDRA 10 North East Inner City guiding principles map for the development of the area. Please refer to section 7.4.1 of this report which includes details of how the proposal complies with the SDRA framework for the area.</p> <p>The proposed works on these streets have been designed in accordance with DMURS.</p>
<b>(iv)</b>	quantum of parking been minimised	<p>The site is located within parking zone 2 due to its location along key transport routes. Owing to the site's proximity to public transport nodes and access to a range of services and amenities in nearby neighbourhood centres as well as its location to the city centre, reduced parking standards have been applied at the site. The maximum parking standards under zone 2 for houses, apartments/ duplexes is 1 per dwelling.</p> <p>Having regard to the location and the urban infill nature of the site, it is considered appropriate that the car parking standards are significantly minimised in order to deliver upon key policy objectives of the development plan including consolidation of the built-up envelope, compact growth and the 15 minute city. The proposal includes 4 no. spaces at a ratio of 0.08 spaces.</p>

No.	Topic	Response
		<p>Further clarification is presented in the accompanying Traffic Mobility Management Plan.</p> <p>The proposal also benefits from designated cycle parking for residents and visitors.</p>
<b>2</b>	<b>Mix of Land Uses (Vibrant Centres and Communities)</b>	
<b>(i)</b>	<p>mix and intensity of land uses appropriate to the site</p>	<p>The primary brief for the site was derived from the applicable zoning on the site of Z1 Sustainable Residential Neighbourhoods'. Residential is permitted under Z1. The zoning objective is to protect, provide and improve residential amenities. The DCCDP also indicates that the density of a SDRA should range from 100-250 uph. Given the proposed development is located in a SDRA, it is a requirement of the Development Plan to include a 5% provision of community, arts and cultural facilities.</p> <p>The subject scheme is therefore deemed appropriate as it meets the provisions of the SDRA and Development Plan.</p>
<b>(ii)</b>	<p>diverse and varied range of housing types</p>	<p>The proposed development includes 1 and 2 bed units. The proposed unit mix at the site has been informed by the DCC housing waiting lists for the area. The area is dominated by private housing with over 75% either rented or owned according to the 2022 census of population. Just 14% of the housing stock consist of housing rented either from the local authority or from a voluntary body. With the provision of 52 units, the share of social housing in the overall stock in the area would give rise to a minor uplift in the overall social housing stock in the area.</p> <p>The proposed unit mix has been informed by the DCC housing waiting list for the area, which indicates 1 and 2 bed units represent c.88% of the demand for units in the area. The proposed unit mix will greatly contribute towards meeting the strong demand for this unit mix and housing typology in the area.</p> <p>Furthermore, in compliance with DCCDP, in excess of 25% of the apartments have been designed in accordance with Universal Design Principles</p>
<b>(iii)</b>	<p>support the regeneration and revitalisation of an existing centre or neighbourhood</p>	<p>The subject development is regenerative for the wider community, in that it utilises a current brownfield site, and serves to provide housing led, in-demand facilities. The proposal is a supportive and positive contribution to the regeneration and revitalisation of the Croke Villas and Sackville Avenue area which will serve to stitch back the street on the southern side, connecting back to the existing urban grain and creating the appropriate conditions for the Boulevard, all of which will complete a new and sustainable environment for all ages and abilities to use and enjoy.</p>
<b>(iv)</b>	<p>enhancement of the public realm</p>	<p>The renewal of the public realm to Sackville Avenue and Ardilaun Square in line with the NEIC Greening Strategy is a key element of this application. Particular focus has been paid on the soft landscaping and surface treatment of Sackville Avenue as an upgraded primary approach route to Croke Park. This entire area is proposed as high-quality paving planted with 15 trees on each side to echo the players on two GAA teams. Tree pits and planter beds further soften the visual appearance of the space and contribute to the SUDS strategy. The existing roadway is realigned providing a wider path and green buffer strip</p>




No.	Topic	Response
		<p>to the proposed houses to the north. Road kerbs are eliminated, and pedestrian movement is prioritized. The new paving is brought up to the building line of the handball alley forming a plaza for gathering on match days. The quantum of soft landscaping has been increased in front of Block A reflecting the residential use. The on-street parking to the existing houses on Ardilaun Square is retained and formalised in the proposal. The link between Sackville Gardens and Ardilaun Square is for pedestrian, cycle, and fire tender/maintenance access only. This paved shared surface will have bollards at each end allowing for permeability but preventing regular vehicle access. A landscaped buffer strip is proposed to the building line but no trees or planting is proposed for the boundary to the railway in accordance with Irish Rail requirements.</p>
<b>3</b>	<b>Green and Blue Infrastructure (Open Space, Landscape and Heritage)</b>	
<b>(i)</b>	<p>positively responded to natural features &amp; landscape character</p>	<p>The design of the street incorporates significant wildlife enhancements through the use of large rain gardens and a variety of native Irish tree species. These landscape features are placed strategically to allow for the movement of large numbers of pedestrians to-and-from the Croke Park stadium. The scheme also includes an extension to Sackville Gardens in front of the proposed Block A building as well as an enhanced layout of Ardilaun Road, both of which include wildlife and visual enhancements.</p> <p>Otherwise, 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>
<b>(ii)</b>	<p>a complementary and interconnected range of open spaces, corridors and planted/landscaped areas</p>	<p>The landscaping and biodiversity proposals are described in detail in the Landscape Report from Mitchell &amp; Associates. This development will include a green boulevard leading to the entrance of Croke Park. This streetscape has been carefully designed to integrate subtle references to the GAA, which serves as the backdrop to the site. These references include the configuration of the street trees that line Sackville Avenue, which have 15 on either side – referencing GAA having 15 players per team – and are grouped in a way that reflects the positions of players in a GAA squad. The design of the street incorporates significant wildlife enhancements using large rain gardens and a variety of native Irish tree species. These landscape features are placed strategically to allow for the movement of large numbers of pedestrians to-and-from the Croke Park stadium. The scheme also includes an extension to Sackville Gardens in front of the proposed Block A building as well as an enhanced layout of Ardilaun Road, both of which include wildlife and visual enhancements. The communal open space is framed neatly by the proposed Blocks A and B, as well as the existing GAA Handball Alley building. The space incorporates a dynamic system of paths and green spaces containing flexible amenities including creative play equipment integrated into the landscape, with seating areas, and natural environments of shrubs and tree planting. All areas of the scheme incorporate SUDS features and native tree and shrub planting. Raingardens serve streets as well as the enclosed courtyard space. These collect surface water and allow for slow and natural infiltration into the ground.</p>

No.	Topic	Response
(iii)	public open spaces universally accessible and designed to cater for a range of active and passive recreational uses	The proposed public realm improvements and open space provision at the site will greatly improve the accessibility and has been designed to cater for a range of active and passive recreational uses within reason owing to the infill nature of the site.
(iv)	integrated nature-based solutions for the management of urban drainage	<p>All areas of the scheme incorporate SuDS features and native tree and shrub planting. The runoff generated from the catchment will be attenuated in storage structures within and below ground. The proposed attenuation systems are explained in section 2.5 of the Engineering Report prepared by Malone O'Regan. A wide range of SuDS measures are proposed across the site to maximise interception and treatment, these include:</p> <ul style="list-style-type: none"> <li>• Tree pits - Tree pits have been specified in suitable areas beside the development roads and car parking.</li> <li>• Green roofs - It is proposed to provide green roofs for low pitch roofs above apartment buildings.</li> <li>• Rain gardens - Localised Rain Gardens are proposed along the road/plaza area where appropriate in combination with the Tree Pits.</li> <li>• Permeable paving - A large area of permeable paving is proposed within the development, within the communal open space and around the apartment blocks.</li> </ul>
4	<b>Responsive Built Form</b>	
(i)	coherent and legible urban structure in terms of block layouts and building heights	<p>The SDR requirements for a density between 100 uph and 250 uph will result in a significantly denser development than that of adjacent housing. This will in turn result in a proposed residential building of increased scale and density. This should be seen as an opportunity, as variety in building height is an important component in helping to achieve a sense of place and create an attractive built environment. The proposed buildings must be considered against the scale not just of the adjoining 2 storey over basement dwellings but also the immediate context of the GAA Handball alley (13-19m) and the Cusack Stand of Croke Park (38-42m). The building forms, massing and heights are aligned with the previously permitted Part 8 application. Block A addressing the expanse of the railway line and canal is 5 storeys, while Block B to Sackville Avenue is reduced to 4 storeys. Both buildings have a predominant pitched sawtooth roof profiles enclosing plant, equipment and water storage, with flat roofs to the end returns facilitating the provision of PV panels. The pitched roof forms resonate with the adjoining dwellings and provide a rhythm and variety to the massing.</p> <p>A sunlight and daylight study has been undertaken by Digital Dimensions and accompanies this application.</p>
(ii)	buildings address streets and spaces	The proposed scheme will create a new urban street edge along Sackville Avenue, Sackville Gardens and Ardilaun Road. Block A is primarily facing the new pedestrian/cycle link between Ardilaun Square and Sackville Gardens, returning at its northern end to meet the handball alley and complete the

No.	Topic	Response
		<p>building line. Block B addresses Sackville Avenue returning at its southern end to from a street edge to the existing laneway.</p> <p>The Community/Cultural/Arts facility is provided in two multi-functional spaces on the southeast ground floor corner of Block B. This location, close to Ballybough Road on the approach to Croke Park ensures prominence and ease of access for the facility.</p>
(iii)	<p>layout, scale and design features of new development respond to prevailing development patterns (where relevant)</p>	<p>The proposed residential development closely follows the Part 8 permission (Ref: 3857/17) with two L- shaped apartments blocks, A and B, forming a strong new edge along Sackville Avenue and creating a new link between Sackville Gardens and Ardilaun Square in accordance with SDRA 10 requirements. The buildings enclose a secure landscaped courtyard for the residents accessed through the stair cores with maintenance access provided from the existing laneway off Sackville Avenue to the southeast. The central courtyard acts as the communal open space that serves development users and includes the play spaces. The primary façades align with the GAA handball alley and the existing dwellings on Sackville Gardens. The building footprints are reduced from the existing Part 8 grant, aligning the northwest façade of Block A with the handball alley and allowing for surface car parking at the ends of both blocks. The previously permitted basement with its parking, plant and ancillary spaces is omitted in this application. The public, communal, and private realms are all very clearly defined within the proposed development. This has largely been achieved by using the building to clearly define the boundaries between each. Where this is not possible (such as where the private spaces of ground floor terraces meet the central communal space, buffer planting and fencing are proposed to define boundaries and ensure privacy is maintained.</p> <p>A full analysis of daylight and sunlight impact has also been undertaken to determine the impact of the subject development on the surrounding buildings. There are no negative impacts, and full details are included elsewhere as part of this planning application.</p>
(iv)	<p>coherent architectural and urban design strategy</p>	<p>A coherent architectural design strategy has been delivered with cognisance to the sites surrounding characteristics, which will make a positive contribution to the regeneration and revitalisation of the former Croke Villas Flats site. The completion of the subject development will deliver greater variety in housing tenure and typology to the Ballybough area.</p> <p>Architecturally, the development aims to be both distinctive and subservient. Within the wider context, the subject development will be distinctive in that, in addition to other adjacent development proposed under the SDRA, it will deliver an increased urban scale as a contrast to the uniform, low rise surroundings. This will help to achieve a sense of place, and aid orientation. The proposal will also complement the completed Handball Alley and the proposed residential units located immediately adjacent to the site. The development will also create a new building form and street edge along Sackville Gardens, Ardilaun Road and Sackville Avenue. The proposed boulevard and establishment of pedestrian connectivity along Sackville Avenue will also benefit from passive surveillance form Block A and B and positively contribute to the urban design strategy for the area.</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
<p><b>SPPR 1</b></p>	<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, 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>The proposed development does not give rise to any separation distance between opposing windows of less than 16m, either to the front or rear of any existing dwellings. The below site plan illustrates the separation distances between the proposed, permitted and existing dwellings surrounding the subject site. The proposed development complies with SPPR1.</p>  <p>(Source: Coady Architects)</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>Apartments 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>Car parking in the scheme has been minimised to 4 no. spaces overall. This entails a ratio of 0.08 spaces per dwelling unit. The proposed development complies with SPPR3.</p>

<p><b>SPPR 4</b></p>	<p><b>Cycle Parking and Storage</b> 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 129 cycle parking spaces are provided. 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. The proposed development is also in accordance with SPPR 4 which requires a general minimum standard of 1 cycle storage space per bedroom and visitor cycle parking is also provided.</p>
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**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.*

Having regard to the infill nature of the site, there is limited opportunity to deliver dedicated public open space at the site, in addition to providing private and communal open space for residents. However, the public open space provision at the site has been proposed in the form of a public plaza fronting the Handball Alley. The proposed public open space of 961 sqm will serve as a multi-functional space for a range of ages and users. The proposed public open space provision is in excess of the 10% requirement, equating to 18%.

The proposed development includes a Boulevard on Sackville Avenue which incorporates elements of the GAA owing to the sites proximity to Croke Park to deliver a high-quality public realm design. The proposed development does include in excess of the standards required for communal open space allocated in the internal courtyard, which will be accessible for residents of Block A and B of the development. The communal open space provision is 500 sqm.

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

The adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. The implementation of self-regulating streets actively manages movement by offering real modal and route choices in a low speed / high quality residential environment.

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

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

Section 4.4.3 states that radii on turns from a link street to a local street may be reduced to 4.5m. A maximum radius of 1-3m should be used on local streets. Complying with requirements of DMURS, junctions and corner radii are proposed as following: Junctions from the Link Road to Sackville Avenue – 4.5m. Junctions between Local Streets – 3m. The vehicle access track drawings provided with the application show refuse and fire tender vehicles crossing the centre line of the Local Street. This is acceptable within DMURS and is encouraged rather than increasing corner radii.

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 carriageway for Sackville Avenue is designed at 5.5m wide in accordance with DMURS. The internal road network within the development will have a carriageway width and footpath have been designed in accordance with the guidance set out in DMURS. The accompanying Engineering drawings prepared by Malone O'Regan includes details of the swept analysis and visibility splays. The proposed design allows for the required visibility splays at all junctions as indicated on the submitted engineering drawings. Additionally, pedestrian visibility splays have been provided at 23m from a 0.7m setback from the road edge. These measures are further evaluated in the accompanying Road Safety Audit.

Section 5 of the accompanying Engineering report prepared by Malone O'Regan demonstrates the schemes compliance with DMURS.

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

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

**Table 5: Apartment Guidelines SPPRs**

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	Mix of units to include: <ul style="list-style-type: none"> <li>- Up to 50% one-bed or studio type units;</li> <li>- No more that 20-25% of the total proposed development as studios;</li> <li>- No minimum requirements for 3-bed.</li> </ul>	The proposed development includes 52 units, of which 5 are 1-bed (10%) and 47 no. 2 bed (90%). The development complies with SPPR1 of the Apartment Guidelines. Furthermore, the proposed mix is justified with regard to housing need and section 15.9 of the Development Plan standards.  On this basis, the development complies.
<b>SPPR 3</b>	Minimum Apartment Floor Areas <ul style="list-style-type: none"> <li>• 1-bedroom apartment (2 persons) - 45 sq.m</li> <li>• 2-bedroom apartment (3 persons) 63 sq.m (subject to a max of 10% of overall units)</li> <li>• 2-bedroom apartments (4 persons) – 73 sqm</li> </ul>	Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) which demonstrates compliance.  The proposed development is for 5 no. 1 bed, and 47 no. 2 bed or a total of 52 units. 2 bed units have been designed to accommodate 4 persons. All units meet the floor area requirement.  HQA sets out in table format the floor area of each apartment and the compliance with the Guidelines and SPPR3.



SPPR No.	Summary	Development Compliance
<b>SPPR 4</b>	<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>(ii) (ii) and (iii) do not apply.</p>	<p>52 of the apartment units are dual aspects. This equates to 100% of the proposed units.</p>
<b>SPPR 5</b>	<p>Floor to ceiling heights</p> <p>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.</p>	<p>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.</p>
<b>SPPR 6</b>	<p>Apartments per core</p> <p>A maximum of 12 apartments per floor per core may be provided in apartment schemes.</p>	<p>The proposed development complies with SPPR6. There are 3 units per core proposed.</p>

***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 1 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 6: Minimum Requirements for communal amenity space**

Unit types	Sqm required	No. of Units	Total required (Sqm)
<b>1-bed</b>	5	5	25
<b>2-bed (4 persons)</b>	7	47	329
<b>Total</b>		52	354

The proposal includes c. 500 sqm of communal open space. The proposed development therefore meets the standard requirement. The proposed communal open space is located in the courtyard between Block A and B.

**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%. In this case, 28 units, which equates to 56% exceed this requirement.

**Play areas**

The Apartment Guidelines 2023 indicate minimum requirements for play areas of schemes of a certain size. The proposed development (apartment types only) includes 52 no. 1-bed and 2- bed units which would fall within the guidelines threshold requirements applying to schemes greater than 25 units of providing 85 to 100 sqm for toddlers and children aged up to six.

The proposed development includes a natural play area an play equipment for the residents of the apartment block in the courtyard.

**Cycle Provision**

Design Standards for New Apartments – Guidelines for Planning Authorities provide the following: Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. Given the proposed housing mix, the guidelines would therefore require the provision of 99 long-stay spaces to serve the development and 26 visitor parking.

99 long-stay and 30 no. short stay cycle parking spaces are provided. In total, 129 spaces are provided. These are sheltered and located in two secure stores inside each block. The storage areas are accessible from the internal courtyard which is closed to non-residents by a gate. This is in accordance with the CDP standards which requires 99 long stay spaces. The dedicated storage space also includes sufficient space for cargo bikes.



It is important to note here that the cycle parking provision in the Apartment Guidelines 2023 are not SPPRs where they are mandatory. Also, SPPR4 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) has not been incorporated in the Dublin City development Plan. Deviation from the standard is at the discretion of the Planning Authority. In this case, the proposed cycle parking is in accordance with the Apartment Guidelines, SPPR 4 Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities, CDP standards and the location is adjacent to high quality bus transport.

### **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 lower parking standards. This accords with National and local policy which seeks to minimise, reduce and wholly eliminate car parking in cities and urban neighbourhoods of the five cities.

The site proposed for development under this Part 8 application would qualify as one such central/and or accessible urban location. The site is served by Bus stop no. 500 and Bus Stop no. 510 along Ballybough Rd Main with Dublin Bus route 123 serving these stops. Route 123 serves travel between Marino towards Walkinstown (Kilnarnagh Rd). In general services operate every 12 minutes during the weekdays, c. 15 minutes on Saturdays and c.30 minutes on Sundays. 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. The site is located proximate to rail stations such as Drumcondra Station and Connolly Station.

Having regard to the location of the development and the site circumstances, 4 no. car parking spaces are provided within the site which equates to a car parking ratio of 0.08.

### **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 include compliance with the 10% additional space compliance and details of proposed private amenity, storage space and aspect.
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 the 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 accompanying report for the study results prepared by Digital Dimensions. In summary, the report concludes:
  - There is a small reduction to the in VSC levels to the windows at 31 Sackville Avenue, Nos 2 - 5 Ballybough Road and Nos 8 – 15 Ardilaun Square, however, the VSC levels are not reduced below 80% of the existing values and meet the recommendations of The BRE guidelines BR209:2022 (third edition). There reduction is in-line with the reduction in VSC values of the planning permitted scheme Reg Ref.: 3455/17. The results show no substantial change in impact from the permitted building to the proposed development.

- In terms of the assessment of Daylight within the Proposed Development 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.
  - In terms of the assessment of Sunlight within the Proposed Development the scheme is well designed for sunlight, with 71.2% of units meeting the minimum recommended 1.5 direct sunlight hours. This is in line with the BRE guideline example for an apartment layout where 4 in 5 achieves the target sunlight hours.
  - All of the proposed communal and public amenity spaces achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st of March.
  - In conclusion, no compensatory measures are required indicating that the proposed development meets the required daylight/ sunlight standards and in considering the impact of the proposed development on surrounding properties.
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.

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 4 to 5 storey within the permissible envelopes of the Dublin City Development Plan.

The key relevant Specific Planning Policy Requirements (SPPRs) are summarised as follows:

**Table 7: Building Height Guidelines SPPRs**

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. The proposed development provides for a range of height from 4 to 5 storey within the permissible envelopes of the Dublin City Development Plan.

SPPR	Summary	Application of Consistency
SPPR 2	<p>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>	<p>This is the responsibility of the Planning Authority. The site is zoned 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	<p>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.</p>	<p>The proposed development ranges in heights between 4-5 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 12 below outlines how the proposed development complies with the development management criteria listed in section 3 of the guidance.</p>
SPPR 4	<p>In planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:</p> <p>minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; a greater mix of building heights and typologies in planning for the future development of suburban locations; and avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.</p>	<p>The proposed scheme gives rise to a net density of 100 uph which accords with the density ranges of the Development Plan and the Sustainable Residential Development and Compact Growth Guidelines for Planning Authorities. The proposal includes varying heights of 4 to 5 storeys which contrast with the existing built form surrounding the site.</p>

Development management criteria are set out under section 3 of the Guidelines. These are addressed in the table hereafter.

**Table 8: 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.	<p>The site is served by Bus stop no. 500 and Bus Stop no. 510 along Ballybough Rd Main with Dublin Bus route 123 serving these stops. Route 123 serves travel between Marino towards Walkinstown (Kilnamanagh Rd). In general services operate every 12 minutes during the weekdays, c. 15 minutes on Saturdays and c.30 minutes on Sundays.</p> <p>The site is located in close proximity to a range of routes, in particular, the no. 73 route is proposed to travel along Ballybough Road and will terminate at the Abbey St/ Talbot St interchange. In addition, the H Spine and D Spine will run along North Strand Road, which is c. 5 minute walk from the subject site. The D Spine serves travel between Malahide Road-City Centre- Crumlin and the H Spine will serve travel between Howth Road-City Centre.</p> <p>The new network will allow for better integration between bus routes and other public transport networks. This will allow residents of the proposed development to be able to change between modes of public transport with ease and be able to access all areas of the city.</p> <p>The site is located proximate to rail stations such as Drumcondra Station and Connolly Station. Drumcondra Station is located c. 800m from the subject site, which provides services for the western commuter line and South Western commuter line. While Connolly Station is located within 800m from the subject site and provides services for the South Eastern, Dart, Northern commuter, Western commuter and South Western commuter train. Connolly Station also provides access to the Luas red line.</p> <p>The site is in close proximity to the Clontarf to City Centre cycle network route. The proposed cycle network surrounding the development is listed below, with the closest Primary Route:</p> <p>Primary Route 2A:</p>

Scale	Criteria	Response
		<ul style="list-style-type: none"> <li>Route 2A is a branch from Primary Route 2 that starts at Drumcondra Road. Route 2A connects from Dorset Street – Bolton Street/ Henrietta Street Junction. • Primary</li> <li>Route 1: From Fairview – North Strand – Amiens Street – Beresford Place – Matt Talbot Bridge.</li> </ul> <p>The closest secondary routes are:</p> <ul style="list-style-type: none"> <li>Secondary Route 1D: Route 1D provides an alternative link to the northern part of the city centre from Fairview via Ballybough and Summerhill to Parnell Square.</li> <li>Secondary Route 2B: Route 2B is also a branch from Route 2 that starts at Clonliffe Road to Beaumont Hospital via a new bridge over the River Tolka to Richmond Road, Grace Park Road and Beaumont Road.</li> </ul> <p>The site is ideally located to avail of high-quality public transport and active travel options.</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 5 storeys. The site is a brownfield infill site surrounded by lower density housing within an established urban neighbourhood of Ballybough. The redevelopment of the site for residential use and community, arts and cultural uses will enable the efficient use of residentially zoned land capable of delivering compact growth. The proposed development is of modest scale and would not warrant a landscape and visual assessment. However, a series of 3D massing images of the proposed development Please refer to Photomontages &amp; CGI Views.</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 to the scale of adjoining</p>	<p>The gross site is 0.88 ha and of relatively small scale. The proposed development consists of public realm improvements and a variety of height and massing forms have been utilised to achieve a scale of development that meets the required density on the site.</p> <p>The building forms, massing and heights are aligned with the previously permitted Part 8 application. The scheme considers the scale of the adjoining 2 storey</p>

Scale	Criteria	Response
	<p>developments and create visual interest in the streetscape.</p>	<p>over basement dwellings, the immediate context of the GAA Handball alley (13-19m) and the Cusack Stand of Croke Park (38-42m). Block A addresses the expanse of the railway line and canal at 5 storeys, while Block B to Sackville Avenue is reduced to 4 storeys. Both buildings have a predominant pitched sawtooth roof profiles enclosing plant, equipment and water storage, with flat roofs to the end returns facilitating the provision of PV panels. The pitched roof forms resonate with the adjoining dwellings and provide a rhythm and variety to the massing.</p> <p>The proposed development responds to the prevailing context while also achieving the required density of an infill site located in 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>it will deliver an increased urban scale as a contrast to the uniform, low rise surroundings. This will help to achieve a sense of place, and aid orientation. At the scale of the subject site, the proposed building presents a new urban edge to Cardiffsbridge Road, whilst forming a backdrop to the developed public open space.</p> <p>The proposed residential development closely follows the Part 8 permission (Ref: 3857/17) with two L- shaped apartments blocks, A and B, forming a strong new edge along Sackville Avenue and creating a new link between Sackville Gardens and Ardilaun Square in accordance with SDRA 10 requirements. The proposed development has endeavoured to retain the existing residential amenity of the area while also enabling the delivery of an infill development. 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 apartment blocks will create a new urban edge and provide passive surveillance. The proposed block is not monolithic and includes rhythm and symmetry in the façade treatment.</p> <p>The palette of existing building materials in the Ballybough area is a mixture of brick and painted or pebble-dashed render.</p>

Scale	Criteria	Response
		<p>Given the prominence of the buildings on the approach to Croke Park and the visibility when crossing the canal on Ballybough Road a high-quality brick finish is proposed for the entirety of the external walls to both Blocks A and B.</p> <p>This brick option has been selected as it is deemed to be sufficiently robust and durable for longevity, but with enough softness to appear sympathetic to the finishes palette of the locality.</p> <p>Two separate brick colours have been chosen, to provide sufficient intelligibility and articulation to the design, with each colour used to respond to the context as described below. The facades to the public realms of Sackville Street, Ardilaun Square and the new link to Sackville Gardens are a multi coloured red/brown textured clay brick in harmony with the red rusted corten steel cladding of the handball alley and the varied bricks of Ballybough Road, Sackville Avenue and Ardilaun Square. A multi coloured white/ grey textured clay brick is proposed as a lighter visual response for the resident’s communal open space. The change in brick responds to the enclosed nature of space contributing to the sense of openness and daylight to improve the amenity. Simple brick soldier courses are proposed on the window and door heads to articulate the openings in the façade.</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 high-quality proposal will provide an improved streetscape and provides a significant public realm space improvements at the site. 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.</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 layout provides for key building frontage along Sackville Avenue and Sackville Gardens, which creates a new urban edge. This is especially important for this particular area which currently avails of little to no natural surveillance or overlooking. The community, arts and cultural space has been</p>

Scale	Criteria	Response
		<p>allocated at the ground floor of block B The north western corner of the site at ground floor has been designated for community/arts/cultural use which will provide street activation and passive surveillance in the vicinity of the junction. It will also provide a focal point and wayfinding/identifying feature on approach to the site from Ballybough Road towards Croke Park.</p> <p>The high-quality proposal will provide an improved streetscape and improve the public realm and community space offering in the area. The proposal will also create a human scale and improve the legibility between the site and the surrounding area.</p>
	<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The proposed development comprises 52 units (5 no. 1 bed and 47 no. 2 bed). The area is dominated by private housing with over 75% either rented or owned according to the 2022 census of population. Just 14% of the housing stock consist of housing rented either from the local authority or from a voluntary body. With the provision of 52 units, the share of social housing in the overall stock in the area would give rise to a minor uplift in the overall social housing stock in the area.</p> <p>The housing waiting list for area H shows strong demand for one-bed and two-bed units, with 65% of the list requiring a one-bed unit and 22% requiring two bed units. In this regard, the proposed development will positively respond to housing need in the area with a balanced unit mix proposed to cater for the strong demand across these particular units mix requirements.</p> <p>The site is located in one of the two sub-City Housing Needs and Demand Assessment (HNDA), the Dublin 1 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 &amp; Community Services Department. Therefore, on review on the needs identified for area H, the proposed mix is acceptable.</p>



Scale	Criteria	Response
		The proposed development will help alleviate a strong demand in the area.
Site/building	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>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. All apartment are dual aspect. All apartments have been designed to include generous storage provision.</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'	A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.
	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.	We refer to the enclosed Sunlight & Daylight report. The proposal meets all the requirements. No compensatory measures are required.
Specific Assessment	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-	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. Having regard to the scale and nature of the proposed development, it is not considered necessary to undertake such assessment.

Scale	Criteria	Response
	climatic effects where taller buildings are clustered.	
	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	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 has also been prepared and accompany this application.
	An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	The development is not of such scale that this assessment is required.
	An assessment that the proposal maintains safe air navigation	The development is not of such scale that this assessment is required.
	An urban design statement including, as appropriate, impact on the historic built environment	A Design Statement has been prepared by Coady Architects and is enclosed with this application. There is no impact on the historic built environment.
	Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate	An AA Screening has been prepared by NM Ecology and accompanies this application. An EIA Screening has been prepared and is enclosed with this application. These are summarised in this report. SEA does not apply.

### 7.3 Regional Policy

#### 7.3.1 Regional and Spatial Economic Strategy 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 direct development toward a brownfield site. It also includes some community infrastructure with the provision of a community, arts and culture room at ground floor of the apartment block B. The proposed development will contribute to a greater diversity in housing tenure in Ballybough and deliver much needed residential units in the area.

## 7.4 Local Policy

### 7.4.1 Dublin City Development Plan

#### *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 present the spatial structure and proposed residential yield in the various areas of the City. North Eastern Inner City is designated as Strategic Development and Regeneration Area (SDRA) 10 with a planned residential yield of 850 units during the lifetime of the development Plan. It should also be noted that an extant permission exists on the site.

Under CSO7 *'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 lands are located in SDRA 10. 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'. Residential is permitted under Z1. The zoning objective is to protect, provide and improve residential amenities. It should be noted that the proposed development does not include the GAA National Handball Centre.

The proposed development of apartments and supporting infrastructure is consistent with the zoning objective Z1 (Sustainable Residential Neighbourhoods) and is therefore considered acceptable in principle under that zoning objective.

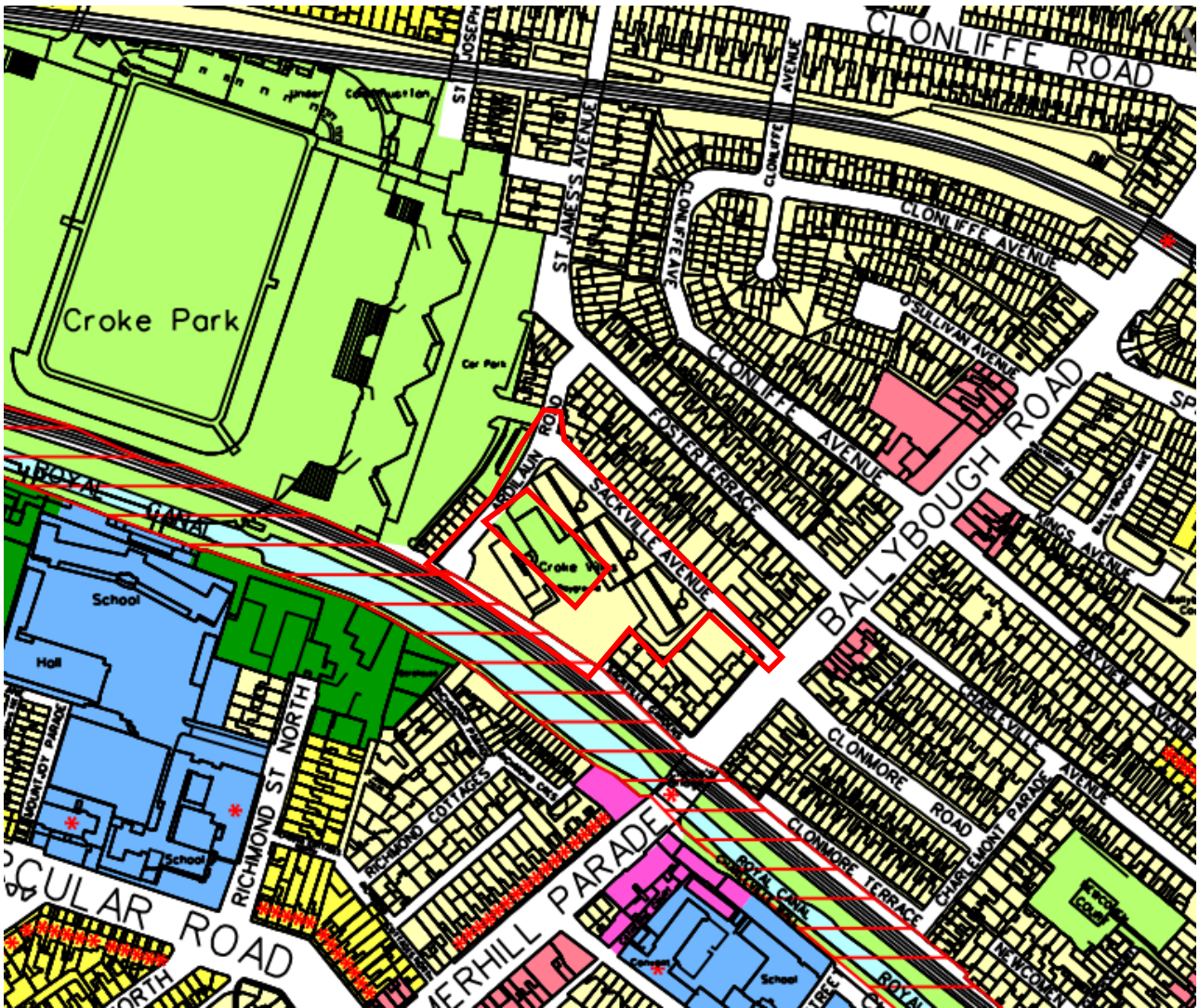


Figure 13: Extract from the land use zoning map of the DCC CDP 2022-2028 (source: DCC)

**Strategic Development and Regeneration Area**

The site is located in the North East Inner City Strategic Development and Regeneration Area (SDRA) 10. 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 all open space areas and the community 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 development proposes a high-quality urban scheme on a brownfield site. The proposal provides for an enhanced pedestrian and cyclist environment and movement along Sackville Gardens and Sackville Avenue. The site is also located within walking and cycling distance to a range of services and amenities and also avails of high-quality public transport networks.</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 proposed height has been designed to respond to the surrounding environment. It is considered that the proposed height is at an appropriate scale in the context of the site’s location, particularly having regard to the immediate context of the Handball Centre which ranges between 13-19 m and the Cusack Stand of Croke Park (38-42m). The proposed development is not of such scale that it would injure residential amenity.</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 development includes a provision of public realm space fronting the Handball alley and includes communal open space located in the courtyard between Block A and B. In addition, private open space is proposed. The boulevard on Sackville Avenue will also provide high quality public realm improvements at the site.</p> <p>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> <p>A Biodiversity Enhancement Plan has been incorporated into the accompanying Landscape Design Report prepared by Mitchell + Associates for the proposed development and includes details how it will support local biodiversity into the future.</p>



Objective SDRAO1	Development Response
<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. An Integrated Surface Water Management Plan/Strategy has been incorporated into the accompanying Engineering Report. The Surface Water Management Plan includes nature-based drainage measures such as permeable paving, rainwater harvesting, rain gardens, green roofs and tree pits.</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 part 8 site is not located in a flood zone A or B. A desktop Flood Risk Assessment was undertaken by Malone O'Regan and accompanies this application. Please refer to section 8.4 of this report for a summary of the assessment.</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>N/a to the subject development.</p>
<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</p>	<p>Please refer to the accompanying Climate Action Energy Statement &amp; Part L Report.</p>

Objective SDRAO1	Development Response
<p>'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><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 &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 5% community, arts, and cultural spaces. Please see the Architectural &amp; Urban Design Statement and area schedules for details. The proposed development includes 152 sqm of internal 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 Ballybough. The application also includes the provision of 68 sqm of external community, arts and cultural space.</p>

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 net internal area of the proposed development is 5761,82 sqm, which results in an area of 210 sqm (5%) provision required at the site to comply with CUO25. A total of 220 sqm of community, arts and cultural space is proposed. The proposed development includes 152 sqm of internal community, arts and cultural use and the remaining 68 sqm provision is allocated externally with 55sqm facing Sackville Avenue and 13 sqm in the internal

courtyard. In addition, part of the original estate lands were disposed of to the GAA to develop the Handball Alley, which significantly contributes to the community offering in the area.

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. By opening the space to the wider community, this will create pedestrian movement in and out of the site. 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 NEIC SDRA also sets the spatial principles for the development and regeneration of the NEIC area. These include inter alia:

- The necessary regeneration of some social housing blocks will provide an opportunity to improve the human scale of the existing urban structure. Redevelopment of these blocks should integrate an urban grain that recognises historic plot sizes of the location.
- A high-quality public realm will be required and shall be applied to the network of streets and public spaces, with a focus on maximising public open space provision, improving connectivity/permeability and encouraging greening initiatives.
- High-quality architectural design and building materials will be encouraged throughout the SDRA. Architectural variety shall be encouraged, and contextual urban grain shall be considered, particularly for infill development. Flexibility will be applied in relation to design style provided there is appropriate regard to built context and relevant policy.
- To facilitate the reimagining of the Royal Canal as a key public amenity and biodiversity corridor.

It is noted that there are no specific guiding principles for the development of Croke Villas likely owing to the fact that this site was previously approved by DCC during the lifetime of the 2016-2022 Dublin City Development Plan. Under the 2016-2022 Development Plan, the site formed part of the SDRA 14 Croke Villas and Environs, and this included guiding principles of promoting high quality residential development, enhance access to Sackville Avenue from Ballybough Road and redeveloping Sackville Avenue as a high-quality public domain space and exploring the potential of extending Sackville Gardens, providing improved passive surveillance and pedestrian and cyclist permeability.

As part of the 2022-2028 Development Plan, an indicative access and permeability link is illustrated along Sackville Gardens, which forms part of the application site. In addition, the Royal Canal Urban Design Study corridor is illustrated below, this is located adjacent to the site.

An illustration of the NEIC SDRA guiding principles is shown below.

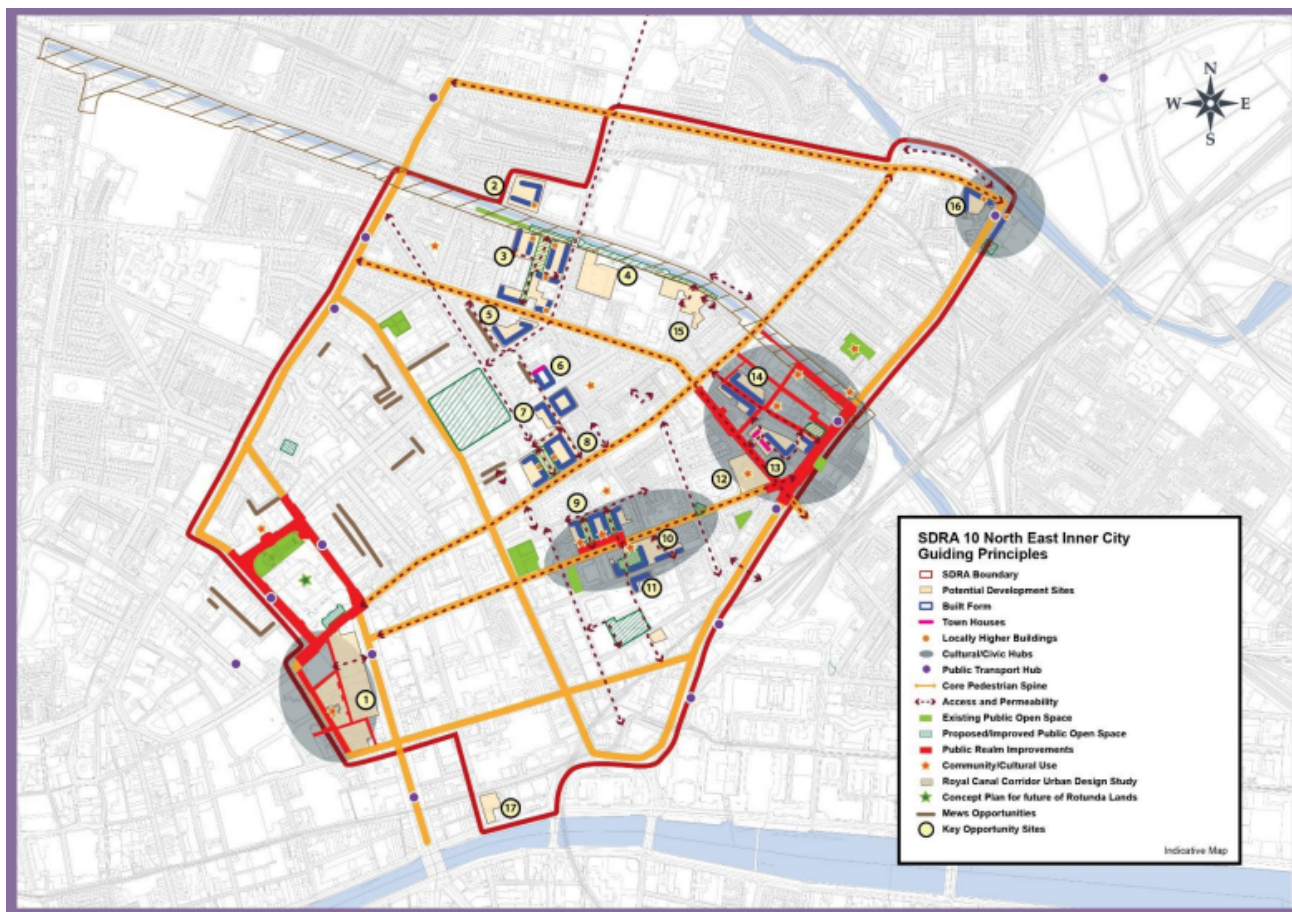


Figure 14: SDR 10 Northeast Inner City (Source: DCC)

### 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. It is noted that in the North Inner City proposals in excess of 15 or more units should include a minimum of 15% three or more bedroom units and a maximum of 25%-30% one bedroom/ studio units. Having regard to the exemptions listed in Table 37 of Appendix 1 of the Development Plan, the subject application is a Council Part 8 residential scheme and therefore it may propose a different mix having regard to the specific needs of the Housing & Community Services Department. The proposed application has been designed in consultation with the Housing & Community Services Department of Dublin City Council. In this regard, the proposed housing mix has been arranged to meet the requirement of the Sub-City Dublin 1 HNDA.

The Part 8 application also supports the achievement of QHSN9 on active land management. The development of these lands will contribute to the consolidation and general improvement of the area. With a proposed density of 100 uph based off a net site area of 0.508 ha, the proposal aligns with QHSN10 as the development is to be located on an underutilised site and 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 enjoys 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 (2022-2028) 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 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).

The proposed development includes a community, arts and culture space (152 sqm) on the ground floor of Block B. The space has been designed in a regular shape to allow for it to be split or used as one space as needed. It is adaptable and will be available to residents and non-residents alike. The 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 4 no. car parking space or a ratio of 0.08. It makes generous allocations for cycle parking, including cargo bikes and it is located near a range of buses and train services. 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 100 uph, provides for connectivity between uses, as well as extending Sackville Gardens which creates permeability in the neighbourhood.

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, with accords with SMT6.

High quality public realm proposals are catered for as part of the development in accordance with SMT9. The development will particularly contribute towards establishing a new building edge along Sackville Avenue and Sackville Gardens. The positioning of block A and B will create a strong and active building frontage. Currently, the pavement and road surfacing are in poor condition. As part of the development, a boulevard is proposed on Sackville Avenue and pedestrian and emergency services are proposed through Sackville Gardens. The new Boulevard and communal open space proposed will benefit from passive surveillance. Please refer to Landscape Plan drawing number SHB4-CVD-DR-MAL-L-P3-0101-Landscape Masterplan.



It is proposed that Emergency Access Vehicles (EAVs) will have access to the outer building perimeter of both buildings, with direct access to each of the stair cores. The proposed EAV access point to the site is via Sackville Avenue, with the route running past the handball alley, along Ardilaun Square, down Sackville Gardens and exiting back to Ballybough Road. This route has been auto track designed for a suitable high-reach fire tender, and details are included in the documentation prepared by Malone O'Regan in this application. In order to prevent the potential for the EAV route along the Sackville Gardens connection being utilised for general vehicular access, locked and removable bollards will be included both at the northern and southern ends.

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 Transport Mobility 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. The infrastructure enhancements along the entire site frontage of the subject site represent a significant improvement to the public street corridor with landscaping proposals complementing the improved pedestrian route accords with SMT11.

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. 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 4 no. spaces. The site is located within parking zone 2 due to its location along key transport routes and the maximum car parking standards are 1 per dwelling. By providing a reduced level of car parking provision, the subject scheme seeks to encourage future residents to either walk or cycle to Fairview, Drumcondra and the city centre and all of the amenities contained therein or avail of the high-quality public transport in close proximity to the subject site. Therefore, the reduced provision of car parking for the subject scheme will contribute to consolidated growth and the reduction in carbon emissions.

In terms of bicycle parking, 99 long stay spaces are provided and 30 short stay spaces are provided. This equates to an overall quantum of 129 no. spaces. 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 as well as high quality landscape features which together will support mitigation and adaptation to climate change. The communal open space includes the provision of play equipment in the courtyard.

GIO1 ('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 and communal open space and therefore meets the 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 proposed development will require the removal of 3 young Himalayan birch trees of low quality and value (C Category) and all scrub and shrubs located within the site boundary. The loss of trees and shrubs required to facilitate the development will have an insignificant impact on the character and appearance of the surrounding local area due to their small size and low quality and value.

The loss of trees has been taken into consideration and new high-quality tree planting has been proposed. The proposed new planting will increase the tree cover across the site. This will have a positive impact on the appearance and amenities of the development and the local surrounding area in the future. All areas of the scheme incorporate SUDS features and native tree and shrub planting. Raingardens serve streets as well as the enclosed courtyard space. These collect surface water and allow for slow and natural infiltration into the ground.

The development includes children’s play facilities as required under GI51 and GI52.

**Development Management Standards**

The development management standards are contained in the Chapter 16 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 9: 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
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	Below the threshold. Therefore, not applicable for this application
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

Reports	Threshold	Application Reference
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 indicated on development plan zoning maps.	See Acoustics Design Report
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.	n/a
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 Ecological Impact Assessment

Reports	Threshold	Application Reference
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	n/a

A Schedule of Documentation prepared by MacCabe Durney Barnes accompanies this Part 8 application. 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 photomontages have been developed in respect of the scheme and accompany this application. Having regard to the modest scale of development at an infill brownfield 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

**Brownfield Sites**

The table below summarises the considerations as they relate to brownfield sites.

Consideration	Development Response
To encourage innovative, high quality urban design and architectural detail in all new development proposals	Please refer to the Architects Design Statement prepared by Coady Architects. The statement includes descriptive and illustrative information on the development proposal, context in which the development is set and the design rationale for the scheme. In addition, the design statement analyses the site context, planning context, opportunities and constraints of the site and the conceptual and
To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.	

Consideration	Development Response
	<p>detailed design of the development, including the building massing, materials and finishes and building articulation.</p> <p>Table 15-2 Information Requirement for Design Statements is noted, it is submitted that the content of the Planning Report and Design Statement satisfy the information requirements for residential developments.</p>
<p>To respect and enhance existing natural features of interest.</p>	<p>The proposed development site includes biodiversity enhancement measures that will provide for ecological value in the area.</p>
<p>To contribute to the streetscape creating active and vibrant public realm.</p>	<p>The proposed development includes an area of public open space fronting onto Sackville Avenue which will serve as a public plaza. The plaza is the principal space separating the street from the Handball Alley. This will provide an attractive proposition at this location creating pedestrian movements in and out of the site.</p>
<p>To create animation and create activity at street level and vertically throughout the building.</p>	<p>The proposed construction of a boulevard on Sackville Avenue and extension of Sackville Gardens will also positively contribute to creating an active and vibrant public realm. The proposal also includes the delivery of 152 sqm of internal community, cultural and arts space at ground floor level of Block B. This location, close to Ballybough Road on the approach to Croke Park ensures prominence and ease of access for the facility</p>
<p>To provide for appropriate materials and finishes in the context of the surrounding buildings.</p>	<p>The palette of existing building materials in the Ballybough area is a mixture of brick and painted or pebble-dashed render. Given the prominence of the buildings on the approach to Croke Park and the visibility when crossing the canal on Ballybough Road a high-quality brick finish is proposed for the entirety of the external walls to both Blocks A and B. The accompanying Visuals and CGIs show that the development is likely to provide the scheme with a richness and value, which is unlikely to have a detrimental visual impact on the subject site or the surrounding context.</p>
<p>To ensure land contamination is appropriately dealt with and mitigated against.</p>	<p>A Site investigation Report and Waste Classification Report accompany this application.</p>



Consideration	Development Response
To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.	Please refer to section 5.4 of the Architect Design Statement
To create new compositions and points of interest.	The proposed location of the community, arts and cultural space at ground floor level of Block B and fronting onto Sackville Avenue will provide for a new point of interest.
To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area	The proposed development includes 220 sqm of community, arts and cultural space. Of this, 152 sqm is provided internally of Block B.
To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.	Please refer to the landscape plans and arboricultural plans.
To prioritise pedestrian and cycle movements in connection with public transport infrastructure.	There is a strong focus on pedestrian and cycle movement as part of the site layout. Car parking is significantly reduced at the site to ensure adequate priority to pedestrian and cyclist movement to and surrounding the site. The proposed pedestrian link between Sackville Gardens and Ardilaun Square will greatly enhance the connectivity and permeability in the area.
To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes	The proposed development will create a strong urban frontage on Sackville Avenue and Sackville Gardens. Active street uses such as community, arts and cultural space is designed at ground floor level in Block B. The aspect of the road is currently poor with no cohesion on its entire length. Through the construction of the Boulevard and the new pedestrian link on Sackville Gardens, the quality of pavements and road surface material will be significantly improved. This development will create a focal point on Sackville Gardens and Sackville Avenue along with greater permeability and improved navigational urban environment.
To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.	Please refer to the accompanying Climate Action Energy Statement, Sustainability & Part L Compliance prepared by Semple McKillop.
Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.	Waste management has been duly considered. There is adequate waste storage to service the development and visibility splay for refuse trucks have been prepared.

**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 proposed development will require the removal of 3 young Himalayan birch trees of low quality and value (C Category) and all scrub and shrubs located within the site boundary. The loss of trees and shrubs required to facilitate the development will have an insignificant impact on the character and appearance of the surrounding local area due to their small size and low quality and value.</p> <p>The loss of trees has been taken into consideration and new high-quality tree planting has been proposed. The proposed new planting will increase the tree cover across the site. This will have a positive impact on the appearance and amenities of the development and the local surrounding area in the future</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. (see also GI7 ‘Connecting Greening Elements in Site Design’)</p>	<p>The Royal Canal is located approx. 25 m south-west of the Site. It consists of open water lined in places by trees, which is a higher-value foraging habitat, and likely of Local importance for foraging bats. It is noted the SDRA includes a guiding principle to facilitate the reimagining of the Royal Canal as a key public amenity and biodiversity corridor. However, there is limited potential for the proposal to contribute towards this principle owing to the Railway line bounding the western side of the site.</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 ecological attributes of the site and the impact of any development should be considered prior to final design.</p>	<p>A Tree Survey has been undertaken by Charles McCorkell Arboricultural Consultancy. The survey identifies 6 no. C Category trees. The protection and retention of these trees, and their root protection areas has been considered in this proposal. The loss of 3 no. young trees and shrubs required to facilitate the development will have an insignificant impact on the character and appearance of the surrounding local area due to their small size and low quality and value.</p>

Standard	Development Response
	The proposed new planting will increase the tree cover across the site. This will have a positive impact on the appearance and amenities of the development and the local surrounding area in the future.

**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 the 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. 150 SUDS Layout and drawing no. 152 SUDS drainage details prepared by Malone O’Regan.

**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	The pitched roofs to both buildings are a green roof build-up. The flat roofs at either end housing the PV panels are concealed by a solid brick parapet.

**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. SHB4-CVD-DR-MAL-L-P3-0101-Landscape Masterplan

**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. SHB4-CVD-DR-MAL-L-P3-0101-Landscape Masterplan and Landscape Design Report.

Consideration	Development Response
A tree survey must be submitted where there are trees within a proposed planning application site.	Please refer to the Tree Survey & Constraints Plan accompanying this application.

**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 development proposal activates an existing street and effectively creates a new enclosed communal open space, creating a new vibrant node of activity. Community uses and public realm combine to achieve this, with good passive surveillance from apartments above. The new public realm and street interface combine to create attractive spaces for enjoyment and social contact.
Open space should be overlooked and designed to ensure passive surveillance is achieved	All proposed open space has been designed to benefit from overlooking and passive surveillance/ Please refer to landscape drawing no. SHB4-CVD-DR-MAL-L-P3-0101-Landscape Masterplan
The space should be visible from and accessible to the maximum number of users.	Please refer to drawing no. SHB4-CVD-DR-MAL-L-P3-0101-Landscape Masterplan.
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.
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 public open space has been designed as a natural continuation of the proposed Boulevard on Sackville Avenue and will provide high-quality public realm for residents and visitors to utilise. The area incorporates hard and soft landscaping features which will provide a high quality landscaped amenity to the area.  The proposed new pedestrian link between Sackville Gardens and Ardilaun Square is located adjacent to the Royal Canal, the proposed connectivity and permeability of this route will greatly enhance the visual continuity offered in this area.
Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	The proposed development will require the removal of 3 young Himalayan birch trees of low quality and

Standard	Development Response
<p>Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.</p>	<p>value (C Category) and all scrub and shrubs located within the site boundary. The loss of trees and shrubs required to facilitate the development will have an insignificant impact on the character and appearance of the surrounding local area due to their small size and low quality and value.</p> <p>The loss of trees has been taken into consideration and new high-quality tree planting has been proposed. The proposed new planting will increase the tree cover across the site. This will have a positive impact on the appearance and amenities of the development and the local surrounding area in the future</p>
<p>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.</p>	<p>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.</p>
<p>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).</p>	<p>The general planting strategy throughout the scheme is for significant structure tree planting with 2 metre clear stems to provide a leafy canopy layer, softening the proposed buildings and a base layer of shrub planting to create low level seasonal interest and colour softening the hard surfaced areas, curtilage and car parking. Eye level between the two planting types is kept clear to maintain sight lines throughout the scheme. Throughout the scheme, the planting palette is uplifted with edible trees and shrubs as part of the amenities provided for the future residents.</p> <p>The priority is given to locally sourced and native planting, when appropriate, to enhance biodiversity and support local biome.</p>
<p>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.</p>	<p>The proposed materials/finishes are clearly annotated on all elevational drawings. The indicated materials are considered to be attractive, well balanced and easily maintained.</p>
<p>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.</p>	<p>Please refer to landscape drawing no. SHB4-CVD-DR-MAL-L-P3-0101-Landscape Masterplan.</p>
<p>Age friendly measures should be incorporated into the design.</p>	<p>The public realm has been designed in accordance with DMURS standard. All parts of the development</p>



Standard	Development Response
	will be accessible. There will be seating in the communal open space.
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 through reduced parking and pedestrian priority.

**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 Coady Architects drawing no. SHB4-CVD-DR-COA-AR-P3-5705 - Proposed Boundary Treatments.

**Public Open Space**

Standard	Development Response
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.	The proposed development includes 961 sqm which exceeds the 10% provision of public open space.

**Play Infrastructure**

Standard	Development Response
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.	The proposed development includes the provision of a natural play area that will be suitable for toddlers and children. The proposed play infrastructure is located in the internal courtyard of Blocks A and B. Seating for parents/ guardians has also been proposed. Having regard to the proposed number of units, a play area for older children and younger teenagers is not required.

**Apartment Standards**

Standard	Development Response
<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	This part 8 proposal was formulated jointly with the DCC Housing & Community Services Department. The department has identified the need for the quantum proposed. The DCC housing waiting list for the area, which indicates 1 and 2 bed units represent c.88% of the demand for units in the area. The

Standard	Development Response
<p>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>proposed unit mix will greatly contribute towards meeting the strong demand for this unit mix and housing typology in the area.</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> 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>52 of the apartment units are dual aspects. This equates to 100% of the proposed units.</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>3 units per core are proposed. The 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. 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</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>At ground level, ground floor perimeter apartments are accessed from the street, with private terraces onto the internal courtyard. Buffer planting and balustrades are provided to ground floor terraces to ensure sufficient privacy for residents. At upper floors, each apartment has a private balcony recessed into the primary building form for shelter and privacy. Balconies are generally south facing to the street in Block A and south facing to the courtyard in Block B</p>

Standard	Development Response
<p>to appropriate landscape design and boundary treatment.</p>	<p>with a small number of east and west facing balconies and the returns of each building. Balconies are generally finished with a vertical railing, to offer visual permeability for views to the surroundings context. Balconies are staggered from floor to floor to provide a sense of dynamism, variety and activity across the simple building forms.</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>Communal open space is provided for the apartment units within the central courtyard framed by Block A and B with a total of 500 sqm proposed. The proposed 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 354 sqm is required therefore the proposed development exceeds this requirement and provides for a generous quantum of communal open space.</p>
<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>A 152 sqm internal community, arts and cultural space is provided as part of the development that will be open to residents to utilise.</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.</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>A large central bin store is located in a freestanding single storey structure off the laneway from Sackville Avenue at the southern end of Block B. A smaller secondary bin store for a portion of the residents in Block A is located at its northern return. This strategy ensures appropriate walking distances to stores for residents is maintained and allows for a central staging point off a service laneway for ease of collection. These locations are within easy access of</p>

Standard	Development Response
	<p>the units above and to the street, therefore the proposed refuse storage space is considered acceptable in principle.</p> <p>Refuse storage is provided, please refer to drawing no. SHB4-CVD-DR-COA-AR-P3-5707 - Proposed Bin Store Details.</p> <p>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> All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind</p>	<p>The City Development Plan 2022-28 addresses Microclimate at Section 15.9.16 Microclimate – Daylight and Sunlight, Wind and Noise.</p> <p>An Acoustic Design Statement including an Inward Noise Impact, Construction Noise Assessment and Operational Noise Assessment was prepared by Wave Dynamics Acoustic Consultants for the proposed development. In summary the report found:</p> <p>In terms of Inward Noise, Stage 1 and Stage 2 ProPG assessment were undertaken. Mitigation Measures including installation, glazing, roof and ventilation are required to control the onset of noise levels. Break-in noise calculations to predict the internal noise levels from road and rail traffic noise were conducted</p>

Standard	Development Response
	<p>including future growth of the roads and rail traffic. Following the assessment, the building envelope performance requirements were determined to achieve adequate internal noise levels.</p> <p>The external amenity spaces on the development include balconies and a communal amenity space at ground level. Appropriate amenity has been provided on the development for residents using a combination of the balconies on suitable facades and the communal amenity space on ground level. This is in line with element 3(v) of ProPG. Based on the recommendations in this report it is predicted that the internal and external noise levels will achieve the targeted noise levels in line with BS 82233:2014 and ProPG 2017 guidance.</p> <p>The construction noise impact is predicted to exceed the BS 5228 requirements without any mitigation measures for the Site Set Up, Substructure and Superstructure stages of the project. General and site-specific mitigation measures have been provided in this report to bring the construction noise levels down within the limits of BS 5228. Construction noise monitoring during the construction period is also recommended to manage construction noise. It is also recommended to erect vibration monitors during the substructure phase of the development.</p> <p>An operational noise impact assessment from the noise generated in the communal amenity space, the traffic generated on the development and car parking. It is predicted that the development will not cause a negative noise impact on the nearby noise sensitive locations. The mechanical plant and equipment specification is not available at this stage of the project, as these projects will be design and build PPP projects. Specific noise limits have been provided for mechanical plant and equipment,</p> <p>Having regard to the proposed height, prevailing building heights and the block layout proposed, it is not considered necessary to undertake a microclimate study as part of the development.</p>



Standard	Development Response
	A Sunlight and Daylight Assessment has been undertaken by Digital Dimensions.
<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>	A daylight and sunlight assessment accompanies this Part 8 application.
<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> SDRA: 100-250 uph</p>	The proposed development has a net density of 100 uph and therefore is well within the range of the CDP for a site within a SDRA.
<p><b>Plot ratio and coverage:</b> The site is located within a regeneration area, therefore the following requirements are applicable: Indicative plot ratio – 1.5-3.0 Indicative Site Coverage – 50-60%</p>	<p>The proposed plot ratio is 1.50.</p> <p>The proposed site coverage is 54%. To calculate the site coverage, the roads, footpaths and public plaza fronting Sackville Avenue were excluded from the calculation.</p> <p>The proposed plot ratio and site coverage are within the indicative standards for this area and are considered acceptable.</p>
<p><b>Bicycle Parking Standards</b> Table 1 of appendix 5 sets out parking standards: Based on the objectives to deliver apartments and community uses at this site the following standards apply:</p>	<p>129 spaces are provided, including 99 no. long stay spaces and 30 no. short stay spaces are proposed.</p> <p>This includes 99 long term spaces to serve the residential portion of the development and 26</p>

Standard	Development Response
<p><b>Residential</b>                      Long stay: 1 space per bedroom in residential apartments                      Short stay: 1 per two apartments</p> <p><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>spaces for the residential short stay spaces required at the site. In addition, 4 no. spaces have been proposed to cater for the community, cultural and arts use at the site.</p>
<p><b>Car Parking Standards</b>                      The site falls under Zone 2 – key transport corridor                      Based on the objectives to deliver apartments at this site the following standards apply:                      1 per dwelling</p>	<p>The proposed car parking provision at the site includes 4 no. spaces at a ratio of 0.08</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>Please refer to Climate Action, Sustainability and Part L Report. The proposal for this development is that 50% all public spaces will have EV chargers installed in line with DCC development plan and the rest will be ducted for future EV charging points.</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>The proposed development includes the provision of 1 no. motorcycle space.</p>
<p><b>Waste Storage Facilities</b></p> <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</li> </ul>	<p>Please refer to drawing no. SHB4-CVD-DR-COA-AR-P3-5707 - Proposed Bin Store Details prepared by Coady Architects which illustrates the location of dedicated waste storage facilities at ground floor. An Operational Waste Management Plan has been prepared by Traynor Environmental and accompanies this application.</p>

Standard	Development Response
<p>collection of dry mixed recyclables and organic waste.</p> <ul style="list-style-type: none"> <li>Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes.</li> </ul>	
<p><b>Green and Blue Roof</b>                      Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application.                      The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.                       Minimum coverage for an extensive green roof is 70%                      Minimum coverage for an intensive green roof is 50%.</p>	<p>Please refer to Engineering Report prepared by Malone O'Regan and the accompanying roof plan drawing.</p>
<p><b>SuDS Requirements</b>                      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. Drawing no. drawing no. 150 SUDS Layout and drawing no. 152 SUDS drainage details prepared by Malone O'Regan.</p>
<p><b>Surface Water Management Planning</b>                      Development including or in excess of 2 no. residential units or 100 sq. m. of non-residential uses (including social and community uses)                      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.</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>

## 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 Appropriate Assessment Screening Report has been prepared by NM Ecology and accompanies this application. The AA Screening 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 Ecological Impact Assessment**

An Ecological Impact Assessment prepared by NM Ecology accompanies this Part 8 application.

#### ***Habitats and flora***

Habitats within the Site include buildings, artificial surfaces, dry meadow, recolonising bare ground, and a small patch of scrub. All are of Negligible botanical importance, so they pose no constraint to future development. The landscaping scheme for the proposed development will involve the planting of a range of native trees and shrubs, some small patches of wildflower meadow, and the installation of bird boxes. These measures will result in a slight net gain in the biodiversity value of the Site.

A small patch of Japanese Knotweed is located on the northern side of Sackville Avenue, outside the boundary of the Site. Dublin City Council has commissioned an Invasive Species Management Plan of the Site, and a herbicide treatment programme is ongoing. The proposed development will not disturb the knotweed, so no further action is required.

A small patch of three-cornered leek *Allium triquetrum* was recorded at the western boundary of the Site off Ardilaun Square. This species is listed on the third schedule of the European Communities (Birds and Natural Habitats) Regulations 2011, which makes it an offence to cause it to spread. It is widespread throughout Ireland, particularly in urban areas. Please refer to the accompanying EIA for details of its removal from site.

#### ***Fauna***

There are two existing derelict structures within the Site: a five-storey apartment building and a two-storey dwelling. Two bat surveys were carried out, and it was concluded that neither building is used by roosting bats. The Site is of Negligible importance for foraging / feeding bats, but the adjacent Royal Canal is likely to be of importance as a foraging habitat. Bat-sensitive lighting techniques have been incorporated into the lighting scheme along Sackville Gardens to avoid indirect illumination of the Royal Canal.

The Site does not contain any suitable habitat for otters, badgers, hedgehogs or other protected mammals. A group of foxes was observed on the Site, but no fox earth or other permanent resting place was recorded, and this species receives no legal protection. Some common and widespread bird species were recorded at the Site, including feral pigeons nesting within the derelict structures. To avoid impacts on nesting birds it is recommended that site clearance works take place outside the nesting / breeding season, or that a pre-clearance survey is carried out.



## Conclusion

Subject to the successful implementation of these measures, we conclude that the proposed development will not cause any significant negative impacts on designated sites, habitats, legally protected species, or any other features of ecological importance.

## 8.4 Flood Risk Assessment

A Desktop Flood Risk Assessment has been prepared by Malone O'Regan and accompanies this Part 8 application. The assessment concludes:

*"The analysis of the flood zone delineation undertaken as part of this DFRA indicates that the proposed site is not expected to be directly impacted during the occurrence of a 0.1% AEP fluvial event. While the exact potential for present and future flooding is unknown due to the lack of PFRA data, there is at least some known risk of flooding in the surrounding area. This risk is made clear given the Flood Zones A and B in the vicinity of the site, and the historical flood events.*

*However, the site is located near the open watercourse of the Royal Canal. The canal should reduce flooding on the site, even when surrounding areas are flooded. In extreme events, surplus surface water will overflow to the canal due to it being at a lower elevation than the surrounding areas. Additionally, historic floods have resulted in revisions which increase the water holding capacity of the canal and Tolka River itself.*

*Additionally, the development proposed to replace impervious surfaces and buildings (including a region of made ground with poor infiltration qualities) with a permeable paving, landscaped courtyards, tree pits and rain gardens and green roofs to the proposed new buildings. These proposals will reduce the potential for the site itself to flood by promoting interception, attenuation and natural groundwater recharge prior to excess runoff entering the wider drainage network.*

*The site also passes the DCC Justification Test for Development as it is both highly valuable and has infrastructure in place for flooding.*

*In consideration with the above assessment, analysis and recommendations, overall, the development of the site as a residential area incorporating landscaped communal open spaces and nature-based drainage solutions, will not have an adverse impact on the existing hydrological regime of the area or result in increased flood risk elsewhere."*

## 8.5 Site Investigation

The site investigation was undertaken in January 2024 and included the collection of 29 no. samples of made and natural ground collected from 12 no. cable percussion boreholes and 12 no. trial pits. There is topsoil at the surface of TP01-TP10. The Made Ground is generally 1.60-2.30m in thickness and is composed of sandy gravelly CLAY with cobble content. The Made Ground at TP05 extends to at least 3.00 mbgl and is composed of gravelly SAND with cobble content. The Made Ground at all locations contains non-natural material >2% of the soil matrix including fragments of plastic, brick and concrete. The Made Ground is underlain by Natural Ground and comprises firm to stiff, sandy gravelly SILT/CLAY to circa. 4.00 mbgl. This is underlain by stiff to very stiff, sandy gravelly CLAY with some cobble content. Some lenses (0.5-1.00m) of medium dense to dense sandy GRAVEL were encountered across the site.

Asbestos was detected at non-hazardous levels (< 0.001%) in TP5 (0.80m). Asbestos was not detected in any other of the samples tested. The sample from BH3 (2.00m) is classified as hazardous for zinc and lead concentrations and the appropriate List of Waste Code is 17 05 03 (Soil and Stone containing hazardous substances). The samples from TP2 (0.70m and 1.40m) are classified as hazardous for zinc concentrations and the appropriate List of Waste Code is 17 09 04 (Construction and Demolition Waste containing Hazardous Substances). The samples from BH1 (2.00m), BH3 (1.00m), BH5 (1.00m), BH6 (2.00m), BH7 (1.00m), TP02 (1.20m), TP04 (0.30m), TP08 (0.40m), TP09 (1.00m and 2.10m), TP10 (1.30m), TP11 (1.20m) and TP12 (1.50m) are classified as non-hazardous and the appropriate List of Waste Code is 17 05 04 (Soil and Stone other than those mentioned in 17 05 03\*). All other samples are classified as non-hazardous and the appropriate List of Waste Code is 17 09 04 (Construction and Demolition Waste other than those mentioned in 17 09 03\*).

Any soils to be removed from the site the recovery/disposal options are outlined in Section 2.4 of the accompanying waste characterisation assessment report prepared by OCM.

## 8.6 Archaeology

An Archaeological Impact Assessment 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).

Having regard to the scale of the site and its potential to contain remains of 18<sup>th</sup>/19<sup>th</sup> century remains, and earlier unknown archaeological features, it is recommended that archaeological test trenching is undertaken pre development. Please refer to the accompanying report prepared by John Purcell Archaeological Consulting for further details.

## 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 internal community, arts and cultural space and, construction of a boulevard, landscaped areas, play area, and ancillary works.

The proposed development which includes 1 and 2 bed units, including universally designed units. It will make a positive contribution to the housing stock and typology in the Ballybough area. It will particularly allow for downsizing opportunities and provide much needed housing for those on the Council housing waiting list.

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 is aligned with the SDRA 10 – North East Inner City and the provisions of the Dublin City Development Plan 2022-2028. The proposal will create an active frontage along Sackville Avenue and Sackville Gardens and makes generous allocation for public realm improvements and community, arts and cultural uses at the site. Internally to the perimeter block, the courtyard landscaping will be an attractive proposal for prospective tenants.

The proposed development will contribute to a diversification of housing tenure in Ballybough and make a positive contribution to the area owing to the provision of high quality landscaped open space through the design of the Boulevard that harnesses the sites historic and cultural proximity to Croke Park.



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