

Site at Collins Avenue, Whitehall, Dublin 9

Planning Report to Accompany a Part 8 Application for Residential Development

Social Housing Bundle 3

April 2022

Prepared by: SB		Checked by: JB
Project Title: SHB3 – Shangan Road, Ballymun		
Project No: 2091		
Rev No.	Description	Date
Rev 0	Draft for Review	08/02/22
Rev 1	Final	21/04/22

MacCabe Durney Barnes
20 Fitzwilliam Place, Dublin 2
T:+353 1 6762594 F +353 1 6762310
W: www.mdb.ie

Confidentiality Statement

This report has been prepared for the exclusive use of the commissioning party and unless otherwise agreed in writing by MacCabe Durney Barnes, no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report. No liability is accepted by MacCabe Durney Barnes for any use of this report, other than for the purposes for which it was originally prepared and provided. Opinions and information provided in this report are on the basis of MacCabe Durney Barnes using due skill, care and diligence in the preparation of the same and no explicit warranty is provided as to their accuracy. It should be noted and is expressly stated that no independent verification of any of the documents or information supplied to MacCabe Durney Barnes has been made.

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	Legislative Background	1
1.2	Background to the Part 8 Application	1
1.3	Structure of the Planning Report	1
2	SITE DESCRIPTION AND SURROUNDING AREA	2
2.1	Location and Surroundings	2
2.2	The Subject Site	3
2.3	Relevant Planning History	4
3	PROPOSED DEVELOPMENT	10
4	POLICY BACKGROUND	12
4.1	National Planning Framework 2040	12
4.2	Ministerial Guidelines	13
4.3	Eastern and Midland Regional Assembly (EMRA) –RSES (2019-2031).....	29
5	LOCAL PLANNING POLICY.....	30
5.1	Dublin City Development Plan 2016-2022 (CDP)	30
6	TRANSPORTATION AND TRAFFIC.....	38
7	DRAINAGE AND WATER SUPPLY.....	40
8	ENVIRONMENTAL CONSIDERATIONS.....	41
8.1	Appropriate Assessment	41
8.2	Ecological Impact Assessment.....	41
8.3	Environmental Impact Assessment Screening	41
8.4	Flood Risk Assessment	41
9	OTHER CONSIDERATIONS	42
9.1	Housing Need	42
9.2	Waste Management.....	42
9.3	Lighting.....	43
10	CONCLUSION.....	43

1 Introduction

1.1 Legislative Background

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

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 1,500 homes in 3 project bundles of social housing developments on sites around Ireland to be delivered by PPP. The Department of Housing, Local Government and Heritage is the approving authority for the programme with the National Development Finance Agency as financial advisor, procuring authority and project manager.

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

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

1.3 Structure of the Planning Report

This planning report was prepared on behalf Dublin City Council to accompany a Part 8 application for the development of 80 apartments and 3 duplex units at a site c. 1.07 ha located on Collins Avenue, Whitehall, Dublin 9.

This report is structured as follows:

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

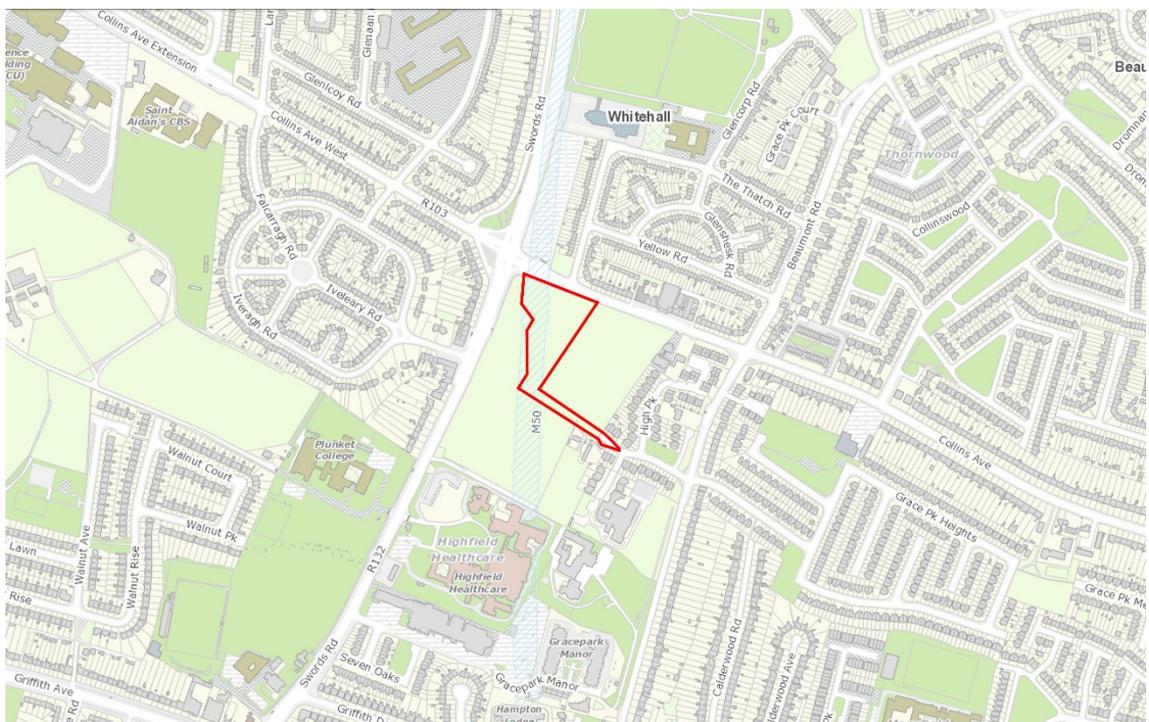
2 Site Description and Surrounding Area

2.1 Location and Surroundings

The site is located c. 3.6 km north Dublin City Centre. It is located at the junction of Collins Avenue (R103) which runs from Whitehall to Donnycarney and the Swords Road (R104), an important artery linking Dublin City to Dublin Airport via the M50. The site is brownfield and the Dublin Port Tunnel runs beneath it in a north-south direction. The site is c. 1.07ha. It is located immediately west of the Whitehall GAA pitches and c. 300m north of Highfield Hospital (private).

The site is close to the junction of Collins Avenue and Swords Road. To its north frontage is a three-lane section of the road and a bus corridor is located less than 100m west of the site entrance on the Swords Road. A pay car park is located north across Collins Avenue. Typical 1950s-1960s two-storey housing can be found north and west of the site across the carriageway. A concrete wall bounds the site on the north and west. There is no physical boundary separating the site from the lands located south of the site. A wire mesh fence runs along the eastern boundary with the GAA pitches. There are two Dublin bus stops immediately adjacent to the site, one on Collins Avenue and one on the Swords Road.

Figure 1: Site Location (outlined in red)



A neighbourhood centre is located c. 120m east of the site. A range of community and public facilities are located within 1km, including the Holy Child Church, the Holy Child Boys National School and the Holy Child Girls National School, the Whitehall GAA pitches and the Rosmini Gaels GAA Club; the Highfield Hospital, Plunket College and the Homefarm Football Club.

The North Bull Island Special Protection Area (SPA) and Special Area of Conservation (SAC) (SPA Site Code 004006 and SAC 000206) is located c.5.1km east of the site and 2.7km of the South Dublin Bay and River Tolka Estuary SPA (Site Code 004024).

2.2 The Subject Site

The site consists of c.1.07 ha of brownfield land and is relatively flat. It was previously used as the Dublin Port Tunnel Depot during the construction of the tunnel. The site has remained unused since.

The subsoils are categorised as man-made.

Figure 2: Aerial View of the Site



Source: Google Earth

Figure 3: Looking east on the Swords Road



Figure 4: Looking west toward the junction



Figure 5: Site looking to the south boundary



Figure 6: Site looking east toward the GAA



Figure 7: Northern frontage of the site



2.3 Relevant Planning History

2.3.1 Subject Site

A review of the Planning Register has not shown any valid applications made on the subject lands. The Vacant Site Register shows that the site is registered (Ref. VS-0654). The site was entered on the register in August 2019.

2.3.2 Adjacent Site to the South

A number of applications were identified on the record relating to the site located immediately south.

PA.Reg.Ref.1547/08 and PL 29N.231812: Planning application refused on the 21st October 2008 by DCC and upheld by An Bord Pleanála on the 16th September 2009 for 460 no. dwellings comprised of apartments and duplex units all located in 8 no 4 to 11 storey blocks (including penthouse level setbacks), 1 no crèche (614m²) and 3 no retail/commercial units (372m²) all on a site area of 2.76 ha. The site is bounded to the west by Swords Road, to the south by Highfield Hospital, to the north by Dublin City Council lands and Collins Avenue and to the east by existing residential development at High Park.

Grounds of refusal included:

1. Excessive scale and density in conflict with planning policy and which would injure the amenities of the area and property in the vicinity.
2. The open space provision failed to comply with the zoning objective for the site (Z12) and lacks of a MUGA in accordance with the provision of the Whitehall Framework Plan.
3. Insufficient information to demonstrate no negative impacts on the stability and structural behaviour of the Dublin Port Tunnel.

PA.Reg.Ref.3269/10 and PL.29N.238685: Planning permission was granted by DCC and upheld on appeal for 458 no. dwellings located in 7 no. 5 to 8 storey blocks (including penthouse level setbacks), 1 no. creche (465m²) and 3 no. retail/commercial units (344m²) all on a site area of 2.73 ha. The site is bounded to the west by Swords Road, to the south by Highfield Hospital, to the north by Dublin City Council lands and Collins Avenue and to the east by existing residential development at High Park.

26 conditions were attached. Condition 13 required that the developers undertake a CATIII design check of the final foundation design and construction methodology within Zone 1 and Zone 2 prior to any substantial construction in these zones above the Dublin Port Tunnel

Condition 14 required confirmation that appropriate measures are incorporated in the design and during the planned pile installation to minimise the load and vibration effects on the tunnel and surrounding ground.

PA.Reg.Ref.3405/19: Permission granted for an amendment to a permitted development (DCC Reg. Ref. 3269/10; ABP Ref. PL29N.238685, as extended by DCC Reg. Ref. 3269/10x01) on the site to the south. The permitted scheme comprised 358 no. apartments, a crèche (465 sq m) and 3 no. retail/commercial units (344 sq m) in 7 no. four to seven storey blocks over partial basement. The proposed development comprised the rationalisation of the existing floor plans and amendments to the footprint increasing the number of apartment units within Block F to 76 no. units (7,226 sq m). Block F will now comprise 27 no. 1 bedroom apartments, 43 no. 2 bedroom apartments and 6 no. 3 bedroom apartments and a communal room for residents measuring 111 sq m. The development also proposes revised elevational treatments; amendments to underground services; bin store; and all associated work above and below ground. As a result the overall number of permitted units is 374.

11 conditions were attached to the permission, including condition 7 requiring the submission to Transport Infrastructure Ireland (TII) of a Construction Management Plan which identifies measures for the protection of the Port Tunnel, including the location of tower cranes and machinery.

Figure 8: Layout permitted under PA.Reg.Ref.3405/19 – extract from Proposed GA Site Plan Reddy Architecture + Urbanism



Source: DCC Planning Register

PA.Reg.Ref.3766/20: Planning application for an amendment to a permitted development (DCC Reg. Ref. 3269/10; ABP Ref. PL29N.238685, as extended by DCC Reg. Ref. 3269/10x01 and DCC Reg. Ref. 3405/19) on the site to the south. The subject application relates to Block A, which is a permitted part 5 no. to part 7 no. storey block located in the north western corner of the subject site and comprised of 43 no. apartments (4,225.5 sq m) and 3 no. commercial units at ground floor level. The proposed development comprises the rationalisation of the existing floor plans and the provision of an additional storey resulting in an increase in the number of apartment units within Block A by 18 no. units to a total of 61 no. units (4,786.1 sq m). Block A will now consist of a part 5 no. to part 8 no. storey block containing 5 no. studio apartments, 19 no. one bedroom apartments, 30 no. 2 bedroom apartments and 7 no. 3 bedroom apartments.

A request for further information was issued in January 2021. Points include inter alia:

- Additional height above the City Development Plan cap should be assessed using criteria under s.3.2 of the Building Height Guidelines 2018
- Revisions to the Tunnel Impact Assessment submitted by the applicants.
- Potential conflicts with the alignment of BusConnect.

An extension of time was given to the applicant to submit the Further Information. At the date of drafting this report, no Further Information had been submitted and no decision made.

Figure 9: Proposed Layout – extract of drawing no. 010100 Site Plan CW O’Brien Architects



Source: DCC Planning Register

ABP.Ref.309608-21: A Strategic Housing Development (SHD) application was made to An Bord Pleanála in March 2021 for the development of 475 No. apartments and 1 No. café unit arranged in seven blocks and a separate purpose built creche facility. The total gross floor space of the development is 42,195 sq m plus 10,460 sqm at basement level principally providing car and bicycle parking, plant and bin stores. The subject scheme also included a 2 No. storey purpose built creche (c. 414 sq m) with an outdoor play area; 348 No. car parking spaces comprised of 284 No. spaces located at basement level and 64 No. spaces located at surface level; 11 No. motorcycle parking spaces; 527 No. bicycle parking spaces comprised of 480 No. secure cycle parking spaces and 47 No. visitor cycle parking spaces; hard and soft landscaping; bin storage; ESB substations and switchrooms; and all other necessary associated site works above and below ground. The proposed development principally replicated the layout and footprint of the scheme permitted under DCC Reg. Ref. 3269/10 / ABP Ref. PL29N.238685 (as extended under DCC Reg. Ref. 3269/10/X1 and DCC Reg. Ref. 3405/19) but

proposes the slight relocation of the creche building to the west and additional height of up to one storey on some of the blocks and the rationalisation of the permitted floorplans, resulting in an increase in the overall quantum of residential units from 374 No. apartments to 475 No. apartments.

The proposed development was refused planning permission on the following grounds:

“In accordance with the Z12 zoning a minimum of 20% of the site should be used ‘as accessible public open space, incorporating landscape features and the essential open character of the site, which shall not be split up into section and shall be comprised of soft landscape suitable for relaxation and children’s play.’

The Board was also not satisfied that ‘the development meets the quantitative standards set out in development plan section 16.10.1 in relation to the provision of communal open space for apartment developments. The development is, therefore considered to materially contravene the Development Plan in relation to the provision of public and communal open space to serve the proposed apartments.’

2.3.3 Site Adjacent to the East

PA.Reg.Ref.2004/11: Permission granted for the construction of a 2 storey clubhouse building, a detached storeroom, a GAA pitch, 2 no. car parks with total 85 no. parking spaces, 2 no. access points from Collins Avenue, and all associated site and landscaping works.

PA.Reg.Ref.2398/16: Permission granted for the retention of an existing GAA Pitch to a reduced width of 82 m with increased distance from the pitch side-line to the east boundary line with the High Park Residential Development of 8 m to confer a clear distance from the east boundary to the pitch side-line of 19 m; an existing two storey clubhouse building of 363.5 sq.m. Car park with 57 no. parking spaces, 1 no. new vehicular access point from Collins Avenue, and all associated site and landscaping works.

PA.Reg.Ref. 2536/21: Planning permission was granted in September 2021 for the development of a sports skills wall at 5m in height, 2 no. artificial grass courts (overall area 353m²) including boundary walls and fencing with ball stop netting around the perimeter at 5m in height and the installation of new floodlighting to the north and south perimeters of the proposed courts as well as all associated site and landscaping works.

2.3.4 Other Relevant Applications

A number of other applications are noted in the vicinity of the site:

ABP.Ref.304061: Permission granted to Respond Airmount (Approved Housing Body) for 101 residential units and associated works. The site is located on the lands of High Park House, a former convent. The site is located less than 200m south of the subject site.

ABP.Ref.306721: Permission granted for 124 built-to-rent units at the Bonnington Hotel, Swords Road, Dublin 9. The site is located less than 300m south of the subject site.

PA.Reg.Ref.3681/20: Permission granted for the erection of a single storey 2no. Classroom Special Education Unit extension (floor area = 455.0sqm) with secure external soft play area to rear of existing single storey School Building (floor area = 1875.0sqm), together with all associated site works.

2.3.5 Local Authority Development

It is understood that a pre-part 8 is being development to the north of the site. No details are publicly yet.

2.3.6 Vacant Site

VS-0654: The site was entered on the Vacant Site Register on 20/08/2019.

In summary, the proposed development has been designed to provide high quality homes in a mix ranging from one to three bedrooms at a net density of c. 95 units per ha on a brownfield site fronting Collins Avenue using a net area of 0.874 ha.

Proposed height is five storeys. The apartments are split into two blocks A and B. Block A fronts Collins Avenue and is rectangular. The three proposed duplex units are located at ground floor of Block B. Block B is located to the south of Block A.

11 units are designed to universal design standards.

4 Policy Background

4.1 National Planning Framework 2040

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

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

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

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

National Policy Objective 3b seeks to *"Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints."*

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

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

The proposed development accords with this objective and provides a defined strong urban frontage on Collins Avenue. The proposed layout caters for communal and public open space. It includes a community room for the 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"*.

The proposed development accords with this objective as the subject site is located close to the Swords Road, a Quality Bus Corridor. The Swords Road is also a proposed Core Bus Corridor in the BusConnect Network. Bus stop no. 237 served by Dublin Bus line 16 which links the site to Balinteer and Dublin Airport. Less than 300m west of the site is another bus stop located on Swords Road. Bus stop 213 is served by Dublin Bus lines no. 1 (toward Pearse Street), 16/c (toward Ballinteer); 33 and 41/b/c/d (both toward Lower Abbey Street) and 44 toward Enniskerry

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

The proposed development accords with this policy and the scheme provides for a range of residential units, ranging from 1 bed (2 persons) to 3 bed (both 3 persons and 4 persons) as social housing which allows flexibility to those having changing needs within the same community.

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

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

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

4.2 Ministerial Guidelines

A number of national planning guidelines may be considered.

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

Those of particular relevance are detailed below.

4.2.1 Childcare Facilities – Guidelines for Planning Authorities 2001

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

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

The provision of 83 units, 41 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, 42 units may generally require childcare in the proposed development.

The Dublin Childcare Committee was consulted which identified childcare providers within a 1km radius and the Social Infrastructure Report identifies providers within a 1.5km radius. 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.

4.2.2 *Quality Housing for Sustainable Communities (2007)*

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

- seek to create a high-quality living environment for residents and enhance the social, environmental and visual quality of the area as a whole;
- seek to ensure a high level of safety and security for the residents through 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; and
- 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 site. The site is currently underused and not maintained. It is bound by a blank wall which provides for an inactive frontage, creating an unfriendly pedestrian environment.

Having regard to the relationship of the site with adjacent properties, the site can be deemed to be unconstrained owing to generous separation distances, which allows for height without impinging on existing residential amenities. It will also provide for a better vista when travelling down the Swords Road southbound with contemporary architect and high-quality landscape replacing the existing blank wall.

All streets and areas of open space proposed as part of the proposed development will be overlooked. The main apartment blocks has been designed to turn corners.

All units have been designed to meet the highest level of energy efficiency. The units will be constructed to the highest degree of air tightness to a possible value of 3 m³/m²/hr¹. The development will use energy efficient technologies to reduce its reliance on fuel and electricity demand. 36 of the 83 apartments are single aspects. These are all south oriented to benefit from solar gain. The proposed development underwent a daylight and sunlight assessment to ensure that appropriate levels of daylight and sunlight are provided to the units.

¹ Semple and McKillop – Whitehall Social Housing Part L and HC 12 Compliance Report.

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

All areas of open space, whether communal or public, have been designed to ensure their maximum use by residents. The internal courtyard is clearly defined and separated from the private open space of units located at ground floor in the apartment blocks.

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

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

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

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

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

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

Table 1: Summary of Design Statement Response to Specific Criteria

No.	Topic	Response
1	Context	The proposed development introduces heights and frontage onto Collins Avenue, particularly where the street widens. It includes the demolition of a painted block wall and replaces it with a more attractive boundary treatment and a significant area of public open space as being the most appropriate usage of the restricted zoned over the Dublin Port Tunnel. In terms of facades, the materials proposed are inspired from prevailing materials in the vicinity of the site.
2	Connections	The proposed development includes a new internal street which will parallel the public open space to its east. The site is located on significant public transport routes which link the site to the city centre and the rest of the city.
3	Inclusivity	13% of the units will be designed to universal design standards. Footpath gradients are gently sloped at no greater than 1:21. Public spaces are designed to allow for flexibility in recreation activity, and to allow for social interaction and active play.
4	Variety	A mix of units is proposed ranging from 1 bed to 3 bed. A number of universal design compliant units is also proposed. A community unit is proposed at ground floor level. The public open space will be a central feature and will support a variety of activities. It is complemented by the communal open space which will serve the prospective residents only, and adds to the recreational offer.
5	Efficiency	The site is a brownfield site which has lain vacant since the completion of the Dublin Port Tunnel. It is well serviced with infrastructure and has excellent connectivity to high capacity public transport. There is a wide range of community infrastructure in the vicinity of the site. The proposed net density is 95 uph. The communal open space is closed off to the west by a single storey bicycle store, which will shelter it from prevailing westerly winds and will also cater for privacy from the car parking area and new street. Generous window sizes are proposed for the apartments to allow them to benefit from the daylight and therefore reduce their energy consumption and for artificial lighting.
6	Distinctiveness	The site layout is largely defined by the large public open space over the Dublin Port Tunnel. The apartment blocks have been designed to create a distinct central communal space for the residents. The elevations, although designed in a consistent manner, all address the frontage they face.
7	Layout	The primary focus was to ensure that internal streets are designed for pedestrians.

No.	Topic	Response
		<p>All parking spaces will be overlooked by the residents and is broken up with tree planting.</p> <p>Active street frontages are provided on the site, with private curtilages and front door to help activate ground floor, particularly along Collins Avenue, the new streets and along the different open spaces. This allows for natural surveillance and reduces the potential for anti-social behaviour.</p>
8	Public realm	<p>The existing 2m high wall bounding the site on Collins Avenue is oppressive and does not allow for passive surveillance. It will be demolished entirely on the Collins Avenue frontage and replaced in parts with a new boundary treatment comprising railing on low brick plinth standing at 1.2m high.</p> <p>The internal new street has been designed to integrate with the park.</p> <p>Car parking is well overlooked by the apartment blocks. 23% of public open space is proposed. It will constitute an attractive new open edge to Collins Avenue as it approached the junction with the Swords Road. This new public open space will be accessible and inclusive for all ages and include different types of planting.</p>
9	Adaptability	<p>The development will provide for a range of apartment sizes. 11 units have been designed to Universal Design Standards. Apartments have been designed to be comfortable, yet adaptable to changing needs.</p> <p>The bathroom layout has been conceived to be adaptable for wheelchair users if required.</p>
10	Privacy	<p>Each apartment has access to its own private open space. Ground floor apartments have a private terrace onto the communal space courtyard and are provided with appropriate boundary to delineate communal from private realms.</p> <p>Adequate storage areas are provided.</p> <p>The internal layout of the apartments is such that it prevents noise transmission between units.</p>
11	Parking	<p>48 car parking spaces are provided, which represents a ratio of 0.58 per unit. Parking is not designated so that the needs of those with higher parking ownership is offset by those who do not own a car.</p> <p>Parking is laid in smaller groupings and separated by tree planting.</p> <p>A total of 178 cycle spaces are provided, 42 of which are for visitors.</p>

No.	Topic	Response
12	Design	<p>Generally, materials to both the public realm and buildings have been selected to strike a reasonable balance between aesthetics, cost and long-term maintenance.</p> <p>Owing to the visibility of all facades, robust materials have been selected and those will align with materials used on the vicinity of the site.</p> <p>Balconies have been designed to allow for ease of maintenance.</p> <p>There is access to the roof levels of both buildings to allow for maintenance only.</p> <p>Public and communal open spaces are generous in size to facilitate a range of activities and but also ease of maintenance.</p> <p>Plant space has been centralised in each of the blocks to avoid the need to cater for individual plant area in each apartment unit.</p>

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

The proposed density is 95 uph. The density is aligned with the recommended density in the Apartment Guidelines.

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

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

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

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

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

Compliance with the requirements of DMURS can be found in the report *Social Housing Bundle 3 – Housing at Collins Avenue, Whitehall - Traffic and Transport Assessment* prepared by RPS. The internal road network within the development will have a carriageway width of 5.5m and a minimum 1.8m footpath width in accordance with the guidance set out in DMURS. Corner radii will not be greater than 6m and will allow for the swept path of a 7.90m refuse truck and 8.68m fire engine. A visibility splay of 45m is required based on a speed limit of 50km/h in accordance with DMURS. Visibility splays in excess of this are achieved from the proposed development access to the surrounding road network once site clearance has been completed.

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

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

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

Table 2: Specific Planning Policy Requirements Apartment Guidelines 2020

SPPR number	Summary	Development Compliance
SPPR 1	Mix of units to include: - Up to 50% one-bed or studio type units; - No more than 20-25% of the total proposed development as studios; - No minimum requirements for 3-bed.	Proposed mix is as follows: 41 no. 1-bed units: 49.4% 30 no. 2-bed units: 36.1% 12 no. 3-bed units: 14.5% The proposed mix has been devised using the Council Social Housing Needs Assessment.
SPPR 3	Minimum Apartment Floor Areas - Studio apartment (1 person) - 37 sq.m - 1-bedroom apartment (2 persons) - 45 sq.m - 2-bedroom apartment (3 persons) 63 sq.m (subject to a max of 10% of overall units) - 2-bedroom apartment (4 persons) - 73 sq.m - 3-bedroom apartment (5 persons) - 90 sq.m	Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) and which demonstrates compliance. The proposed development is: 41 no. 1 bed - 2 person 26 no. 2 bed/ 4 person 4 no. 2 bed / 3 person 8 no. 3 bed – 6 person 3 no. 3 bed – 5 person Total No. 83 87.9% of the units exceeds the minimum standards in the Apartments Guidelines and the HQA sets out in table format the floor area of each apartment and the compliance with the Guidelines.
SPPR 4	Dual Aspect (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics	56.6% of units are dual aspect. All single aspect units are south facing.

SPPR number	Summary	Development Compliance
	and ensure good street frontage where appropriate in. (ii) and (iii) do not apply.	
SPPR 5	Floor to ceiling heights Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.	The proposed floor to ceiling height of ground floor units is 2.7m in accordance with this specific policy.
SPPR 6	Apartments per core A maximum of 12 apartments per floor per core may be provided in apartment schemes.	The proposed development complies with SPPR6. In Block A, each core serves four units. Block B includes up to 10 apartments per core.

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

A number of non-specific standards are provided in the *Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)* (Apartment Guidelines 2020) which are outlined below and compliance thereto. This section should be read in conjunction with the Architect's Housing Quality Assessment (HQA).

Minimum Quantitative Standards

Appendix I of the *Design Standards for New Apartments - Guidelines for Planning Authorities (2020)* 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.

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

Table 3: Minimum requirements for communal open space

Unit types	Sqm Required	No of Units	Total Required (Sqm)
1-bed	5	41	205
2-bed (3 persons)	6	4	24
2-bed (4 persons)	7	26	182
3-bed	9	12	108
Total		83	519

The total communal open space provision is 543 sqm. A diagram showing how areas are calculated is provided on the site density calculation drawing no. SHB3-WHL-AR-COA-DR-0707-Public Open Space. The provision of communal space is in excess of the guidelines' requirement.

Size in excess of ten percent floor area

Section 3.8 (a) of the *Design Standards for New Apartments - Guidelines for Planning Authorities* provide that *'the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom units types by a minimum of 10%.....'*.

The schedule of accommodation and HQA demonstrates that 87.9% of the units are in excess of ten percent larger than the minimum floor area.

Play areas

The Apartment Guidelines 2020 indicate minimum requirements for play areas of schemes of a certain sizes. The proposed development includes 41 no. 1- bed units but also includes 30 no. 2-bed units and 12 no. 3-bed units or a total of 42 units 2 or more bed. As a result, the guidelines requirements applying to schemes greater than 25 units of providing 85 to 100 sqm for toddlers and children aged up to six should be complied with. The scheme includes a 108 sqm play area for small children in the courtyard between Blocks A and B.

As the scheme does not include 100 or more units with two or more bedrooms, a larger play area is not required. The proposed development also includes 275 sqm of play area for older children in the main public open space as illustrated in drawing No. SHB3-WHL-AR-COA-DR-0707-Public Open Space Whitehall Landscape Masterplan prepared by Mitchell and Associates. Seating is also proposed in the courtyard. Details of the specific play equipment will be agreed with Dublin City Council.

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.

A total of 136 resident cycle spaces are provided. 60 of those are located in the bike storage block, the rest would be located in bike shelters located along the east boundary of the site. A further 42 spaces are provided for visitors. These will be provided adjacent to the main entrance of Block B and within the linear park. In addition, 3 spaces for mobility scooters or cargo bikes are also proposed.

For cycle parking please refer to the following drawings:

- SHB3-WHL-AR-COA-DR-0720 Proposed Ground Floor
- SHB3-WHL-AR-COA-DR-0704 Proposed Site Plan

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.

The site proposed for development under this Part 8 application would qualify as one such central/and or accessible urban location.

The Mobility Management Plan (MMP) notes that the site is located adjacent to a number of bus stops on both R103 Collins Avenue (stop numbers 237 and 215) and R132 Swords Roads (stop numbers 213 and 1620). Together these bus stops are served by 10 no. Dublin bus routes to the wider Dublin area. They generally link the site to: Dublin Airport, Ballinteer, Santry, Sandymount, O'Connell Street, Lower Abbey Street, Balbriggan, Swords, Rostown, DCU and Enniskerry.

The Dart, northern, southwestern and western commuter trains are within a walking or cycling distance from the site.

Future public transport schemes are planned for the vicinity of the site.

The Swords Road will be located on the A Spine of BusConnect, which will increase service frequency and capacity. In addition, the N2 and N4 orbital routes, the 22 city-bound route and the L80 Local route to DCU will all be in the vicinity of the site.

MetroLink, a light underground rail system is proposed to extend from Swords, via Dublin Airport to the City Centre. The new underground station is proposed to be located on Collins Avenue, c.1.6km of the site.

The Mobility Management Plan examines travel patterns of the residents in the vicinity of the site. It notes in particular:

- 28% of the residents travelled to work or school in a car / van, and 7% as car passenger;
- 20% of households do not own a car
- The existing vehicle ratio per household is 1.05 in the census data.

48 residents car parking spaces are proposed which equates to a car parking ratio of 0.58. The MMP notes this ratio is lower than the existing ratio in the locality. The MMP notes that the site is within Dublin City and within walking distances of numerous schools and of DCU. It further adds that car parking will be managed by the PPP consortium with a view to encourage toward more sustainable forms of transport. Importantly, the MMP states that the proposed parking ratio is *'greater than the expected private vehicle requirement for daily commuting to work or school derived from the 2016 census data. The census data indicated that in 2016 28% of respondents used drove a private car or van to travel to work or school, not including 7% of respondents who travelled as a passenger. For the purposes of this assessment, the maximum potential number of drivers in this development was assumed as 166no. (based on two driving adults per household). Therefore 28% of 166no. driving adults equates to a potential of 46no. vehicles required for daily commuting from the development, which is less than the 48no. provided. It is considered these extra parking spaces could be used for short term fluctuations in modal split and visitor parking.'*

On this basis, the provision of 48 resident spaces is acceptable.

Content of Planning Applications

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

1. A Housing Quality Assessment (HQA) accompanies this part 8 application. It includes:
 - Compliance with the 10% additional floor area
 - Details of proposed private amenity space, storage space and aspect.

2. A daylight and sunlight analysis report by H3D is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of the *British Standard: Lighting for Buildings – Part 2: Code for Practice for Daylighting*, BRE 209, and ‘*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*’, Second Edition 2011, by P. J. Littlefair. The report concludes that

‘Of the 131 no. spaces assessed, all meet or exceed the required BRE values of 1.0% for bedrooms and 2.0% for combined kitchen/living/dining spaces.

So, the proposed apartments are considered to provide an acceptable standard of amenity from a daylight perspective. Future occupants will enjoy good levels of daylight within the proposed scheme along with access to amenity areas that can receive excellent levels of sunlight.’

And:

‘Communal Space Amenity Overshadowing:

The amenity overshadowing study of the communal space shows that the amenity areas will receive at least 2 hours of direct sunlight on the 21st of March thus passing the BRE guideline level for overshadowing.’

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

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

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

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

The *Dublin City Development Plan 2016-2021* applies to the subject site. The proposed development provides for a height of 5 storey within the permissible envelopes of the Dublin City Development Plan. It includes a mix of apartments and duplex units.

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

First the guidelines pose three broad questions:

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

The response to this question is that the proposed development is located on a brownfield site which has long lain vacant. It is also a registered vacant site. The proposal to develop residential

units on the former Dublin Port Tunnel Depot site therefore positively assists in fulfilling targets as set by the NPF.

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

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

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

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

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

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

Criterion 1: At the scale of the relevant city

Criteria in the Building Height Guidelines 2018	Development Response
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The site is located immediately adjacent Bus stop no. 237 served by Dublin Bus line 16 which links the site to Balinteer and Dublin Airport. Less than 300m west of the site is another bus stop located on Swords Road. Bus stop 213 is served by Dublin Bus lines no. 1 (toward Pearse Street), 16/c (toward Ballinteer); 33 and 41/b/c/d (both toward Lower Abbey Street) and 44 toward Enniskerry In addition, the Swords Road is also a proposed Core Bus Corridor in the BusConnect Network.
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	The proposed development is not located in an architecturally sensitive area. It proposes a height of 5 storeys. The site is located at a visually strategic location, particularly when travelling the Swords Road southbound. The 5-storey blocks are laid to the east of the proposed public open space and will provide a strong frontage onto it. The site is located well away

Criteria in the Building Height Guidelines 2018	Development Response
proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	from existing residential units. It is of modest scale, well within permissible heights envisaged by the Dublin City Development Plan and would not warrant a landscape and visual assessment.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	The net site is 0.87 ha (1.07 ha gross) and of relatively small scale. This criterion does not apply as it is an infill site.

Criterion 2: At the scale of the district / neighbourhood

Criteria	Development Response
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	<p>The part 8 site is unkempt vacant site which was once used for construction purposes. On completion of the Dublin Port Tunnel, any equipment or materials that were stored on site were removed and the site was left with no landscaping. Its boundary consists of a 2m high blank continuous boundary wall. There is no visibility for pedestrians travelling west on Collins Avenue.</p> <p>The proposed development will provide a strong frontage onto Collins Avenue with Block A. As one travels west toward the junction with the Swords Road, the site will open onto a large area of public open space. This open space will front Collins Avenue. It will be bound by trees.</p> <p>The removal of the northern boundary wall supported by the provision of the public open space will support an improved vista toward the south. The site owing to the prevalent topography and to its location near a significant junction is visible at a distance.</p> <p>As a result, it is considered that the proposed development would make a positive contribution to the area, providing for architectural and visual improvements.</p>

Criteria	Development Response
<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 key elevations are those proposed to face Collins Avenue (Block A, north elevation) and onto the public open space (Block B, west elevation).</p> <p>As can be seen on drawings no SHB3-WHL-AR-COA-DR-0730 Proposed Elevations Sheet 1 PP2 and SHB3-WHL-AR-COA-DR-0731 Proposed Elevations Sheet 2 PP2, the proposed blocks are not monolithic while including rhythm and symmetry in the façade treatment.</p> <p>No uninterrupted walls of building are proposed. All corners are turned with passive surveillance provided onto the street and the proposed public open space.</p> <p>Due to the visibility of all facades, a clay multi brick has been chosen for the entire development. This allows for robustness as well as aligns with prevalent materials used in the area.</p>
<p>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009)</p>	<p>As discussed earlier the current interface of the site with Collins Avenue is poor with over 100m of blank wall of no visual merit.</p> <p>The opening of the site onto Collins Avenue will cater for an improved streetscape on the south of Collins Avenue. It will improve pedestrian sense of safety.</p> <p>The provision of a strong frontage onto the proposed public open space will be highly beneficial to ensure the creation of a human scale between landscaped and built areas of the site. This will also allow for passive surveillance.</p> <p>The site is not prone to flooding.</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 vacant site is unkept and makes no aesthetic contribution to the area. The proposal will positively contribute to the area owing to high quality public realm and tree planting.</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 makes a positive contribution to the housing stock owing to a mix which includes smaller units (1 and 2 beds).</p>

Criterion 3: At the scale of the site / building

Criteria	Development Response
<p>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</p>	<p>The Design Statement sets out in detail the design rationale of the scheme.</p> <p>The majority of apartment are dual or corner aspects. There are no single aspect north facing units proposed.</p> <p>All apartments have been designed to include generous storage provision. The layout is consistent over each storey so as to avoid noise transmission across units.</p> <p>A Daylight assessment has been carried, its findings are detailed above. It found that the units would enjoy adequate levels of daylight.</p>
<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting</p>	<p>A daylight and sunlight analysis report is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of the <i>British Standard: Lighting for Buildings – Part 2: Code of Practice for Daylighting</i>, BRE 209, and 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice', Second Edition 2011, by P. J. Littlefair. A summary of the conclusion is provided in section 4.2.5 above which concludes that that the proposed apartments are considered to provide an excellent standard of amenity from a daylight perspective.</p>
<p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</p>	<p>The proposal meets all the requirements. No compensatory measures are required.</p>

Specific Assessments

Criteria	Development Response
<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</p>	<p>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. As this development is 5 storeys on a brownfield site, it is considered that development is not of such scale that a microclimatic assessment is required.</p>
<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.</p>	<p>An ecological impact assessment was undertaken. It considers that all habitats are of negligible ecological importance. No protected plants or problematic invasive species (e.g. Japanese knotweed) were recorded. . Overall, the Site is considered to be of Negligible importance for common bird species. It is not used for feeding by overwintering birds. There are no roosting bats on site. Lighting from adjoining roads makes it unsuited for a significant amount of bat activity. There is an opportunity for enhancement for birds through the provision of bird boxes.</p>
<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</p>	<p>The development is not of such scale that this assessment is required.</p>
<p>An assessment that the proposal maintains safe air navigation</p>	<p>The development is not of such scale that this assessment is required.</p>
<p>An urban design statement including, as appropriate, impact on the historic built environment</p>	<p>There is no impact on the historic built environment.</p>
<p>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</p>	<p>A full EIA screening report, an AA screening report and Ecological Impact Assessment have been carried out and accompany the Part 8 suite of documents. These are summarised at the final sections of this report. SEA does not apply.</p>

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

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

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

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

The 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 room at ground floor of Block A. The provision of smaller units will contribute to a greater diversity in housing tenure.

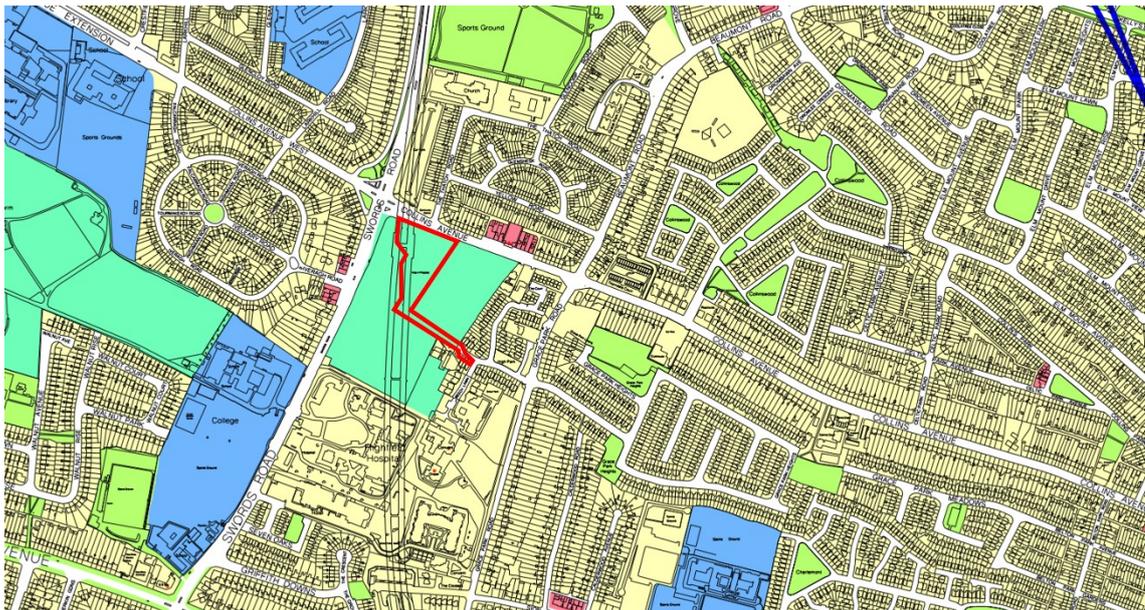
5 Local Planning Policy

5.1 Dublin City Development Plan 2016-2022 (CDP)

5.1.1 Zoning

The Dublin City Development Plan (CDP) is zoning the lands zoned Z12 'Institutional Land (Future Development Potential)'. The objective is 'to ensure existing environmental amenities are protected in the predominantly future use of these lands'. Residential is normally permissible.

Figure 11: Zoning Map (site outlined in red)



The principle of development complies with Z12 zoning.

The CDP requires that development on Z12 zoned lands should incorporate a minimum of 20% of accessible public open space.

The preparation of a masterplan is required to accompany development proposals on Z12 zoning to set out a 'clear vision for the future of the future for the development of the entire landholding' (section 14.8.12). This masterplan should:

- Identify the strategy for the provision of the 20% public open space;
- Create high quality new public open space linked to the green network and/or other lands.

Drawing no. SHB3-WHL-AR-COA-DR-0703- Site Masterplan Principles sets out the vision for the lands.

Other requirements should be considered on the form of the open space and what it should comprise of.

The proposed development incorporates 23% of public open space which is highly accessible to the public as can be seen on drawing no. SHB3-WHL-AR-COA-DR-0707-Public Open Space.

The Design Team considered the whole land bank which includes the GAA pitch to the east, the permitted development to the south and the lands to the west. Accessible public open space provision as part of the permitted residential schemes is broadly located on the footprint of the Dublin Port Tunnel, which provides for a cohesive open space spinal axis. This is completed by the existing GAA pitches which were recently given planning permission for upgrade which will continue to act as a key recreation amenity for the existing and prospective residents of the area.

It is important to note that the general area around the part 8 site has long been host of numerous institutions. Their large footprints include a vast array of open space areas, parks and outdoor recreational facilities. The use of a brownfield site, with no existing landscaping and grass cover, as residential development with a generous public open space allocation, will create an important green link in the Dublin 9 and will contribute to a more cohesive green network.

An illustrative masterplan concept can be viewed in drawing *SHB3-WHL-AR-COA-DR-0703 Proposed Site Masterplan* with additional narrative on form and massing provided in the Architect Design Statement. This illustrative masterplan is in full compliance with the City Development, which has been the subject of Strategic Environmental Assessment.

5.1.2 Other Relevant Policies and Objectives

Transport

MT22 requires *'the submission of a **Development Assessment** for all development proposals located in the vicinity of both Dublin Port Tunnel, the proposed DART Underground protected corridor, or any proposed public transport tunnel. Detailed requirements for Dublin Port Tunnel are set out in Appendix 6, and Iarnrod Eireann should be consulted in relation to heavy rail.'*

Appendix 6 requires the following:

- *'Dublin City Council is committed to conserving the structural integrity of Dublin Port Tunnel and special requirements relate to structural engineering of any proposed development that lies over the tunnel corridor area.'*
- *The Dublin Port Tunnel meets the city boundary at the Coolock Interchange and the route follows a south-easterly direction to East Wall Road.*
- *A suitably qualified structural engineer must prepare a development assessment. **If the proposal is within 6 m of the outer edges of the tunnel bore, a suitably qualified tunnelling engineer must prepare the assessment.***
- *Assessment of the structural suitability of proposals and submitted applications is at present carried out by Transport Infrastructure Ireland, acting on behalf of the Roads and Traffic Department of Dublin City Council.*
- *To assist prospective developers of lands along the tunnel route, Dublin Port Tunnel Guidance Notes March 2009, The Assessment of Building Developments in the Vicinity of Dublin Port Tunnel, are available from the Roads and Traffic Department of Dublin City Council or may be downloaded from www.dublincity.ie'*

RPS prepared a Development Assessment Report (DAR) in accordance with the requirements of MT22 as set out above. Transport Infrastructure Ireland (TII) has designated two zones above the Dublin Port Tunnel. Zone 1 is directly above the tunnel and extends 6 m on either side, whereas Zone 2 is a 18m strip either side of Zone 1. There are more stringent constraints to the undertaking of development on Zone 1 lands. The built elements of the proposed

development are located as to not encroach on Zone 1. A portion of each block will be located on Zone 2.

To minimise impacts, no basement is proposed, and all parking is provided at street level.

To support the DAR, ground investigations were carried out. It led to the selection of thick raft slab foundation for the blocks. The DAR effectively reviews the cumulative impacts of developing on either side of the tunnel on the Council's own lands. The Design Team consulted with TII with a view to assess the surcharge loading threshold during construction and at completion to ensure that it does not exceed 22.5kN/m² in accordance with TII Guidance. This number regards the additional 'stress' surcharge onto the site at various stages of the project. The maximum surcharge stress identified is estimated to be 15.2 kN/m² which is below the threshold as set out by TII.

Community

'SN5: To ensure that applications for significant large new developments (over 50 units) are accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.

A Social Infrastructure Audit was carried out. It concludes that the site is located in close proximity to a wide range of facilities including sports, leisure, community, institutional, health, retail. A community room is also provided as part of the development with a view to cater for the needs of prospective residents.

5.1.3 Development Management Standards

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

The table below summarises the development standards applicable to residential developments on brownfield sites.

Design Standards

Table 2: Design Standards

Standard	Description	Development Response
Sustainable Open Space	Provide for accessible open space and landscaping which enhances ecological value and increases biodiversity.	The public open space is located in a highly visible and accessible location and will be a significant contributor to the area's ecological value. Currently the site is by nature of limited ecological value.
Sustainable Urban Drainage	The following should be considered: <ul style="list-style-type: none"> - Green roofs - Attenuation ponds, swales, wetlands and detention basins (in larger schemes) - Permeable paving - Infiltration planters Water butts	The Drainage and Watermain Design Report outlines the SUDS measures proposed as part of the development as follows: <ul style="list-style-type: none"> - green roofs will be provided. A minimum of 70% coverage has been achieved as can be seen in the Drainage and Watermain Report. - Pervious paving will be provided for all car parking.

Energy Efficiency	Passive solar design	The Design Statement notes that all units will be energy efficient. Window openings have been designed to ensure sufficient daylight provision, without being too large to the detriment of heat loss or solar overheating. Potential PV locations are indicated on the roof plans. The extent and location of PVs will be the subject of detailed proposals by the developer.
Inclusive Design	Consider the needs to of vulnerable groups such as older persons and disabled. This includes consideration of such provision of level circulation, lifts, door width and detail, surface finishes, signs and information.	As noted in the design statement. All typologies proposed have been refined with areas optimised and plan forms simplified. Apartments have been designed to cater for an efficient and rational layout.
	Needs of the occupants of different ages and stage of life shall be considered, ensuring scale, form, construction and internal arrangement of the building will enable future adaptability.	Internal walls are thicker than typical to allow for various construction options. It is also noted that a number of Universal Design units will be provided. The bathroom layout facilitates for later adaptation for wheelchair uses if required.

Boundary Walls and Railings

Table 3: Boundary Wall and Railings

Standard	Description	Development Response
New boundary walls	New boundary walls or railings should replicate an existing or traditional patterns which is characteristic to the immediate locality.	Please refer to the SHB3-WHL-AR-COA-DR-0705-Site Boundary Treatment Plan which shows the proposed boundary treatments across the site and to SHB3-WHL-AR-COA-DR-0730-Proposed Elevations Sheet 1 and SHB3-WHL-AR-COA-DR-073-Proposed Elevations Sheet 2 which show their use in context. The proposed development will provide for an urban edge on Collins Avenue. The current boundary treatment is poor and does not cater for natural surveillance or active frontage.
	Use a design and materials appropriate to the existing or proposed building and street scene.	The existing boundary treatment on Collins Avenue consists of c.2m high blank wall. The proposed boundary on Collins avenue will be formed around private curtilage for the ground floor units. It will consist of a 1.1m high galvanised powder coated railing on a low brick plinth. The same

Standard	Description	Development Response
		treatment is proposed for units located at ground floor facing west.

Landscaping

Table 4: Landscape Standards

Standard	Description	Development Response
Hard landscaping	Materials: materials must be appropriate, durable and of good quality. Careful consideration must be given to the design of hard-surfaced areas. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	Appropriate materials are used and illustrated in landscaping plans accompanying the documentation. Please refer to SHB3-WHL-AR-MA-0001. Landscape Masterplan
Boundaries & streets furniture	Wall, fences, metal railings and gates used to define spaces and their usage all impact on the visual character of the development. These should be selected so as to be an integrated part of overall design. Street furniture should be sited such that it does not provide an obstacle for people with disabilities.	<p>Please refer to the SHB3-WHL-AR-COA-DR-0705-Site Boundary Treatment Plan-PP2 which shows the proposed boundary treatments across the site and to SHB3-WHL-AR-COA-DR--0730-Proposed Elevations Sheet 1 and SHB3-WHL-AR-COA-DR--073-Proposed Elevations Sheet 2- which show their use in context.</p> <p>Boundaries are proposed to form private curtilage for the ground floor units. This allows the creation of a 'residential' feel for the blocks and the surround existing and proposed street network.</p> <p>Where street furniture is proposed, it will be located in dedicated public or communal area as defined by the landscape masterplan.</p> <p>Please refer to SHB3-WHL-AR-MA-0001.</p>
Soft landscaping including trees	Existing trees and vegetation should be retained where possible.	There is no existing trees will be lost as result of the development vegetation on the site.
	For larger sites, including institutional lands, proposals must take cognisance of the existing landscape character and quality	<p>The site is best described as a former construction compound and does not have any particular landscape features.</p> <p>The proposed development includes high quality landscape proposals as detailed on SHB3-WHL-AR-MA-0001 Landscape Masterplan. It will include tree planting, soft and hard landscape and play areas for the use of existing and prospective residents.</p>

Standard	Description	Development Response
	Where a large site adjoins a green corridor, public open space or area of high ecological value, any new public open space on the site should be contiguous to same and expansion of biodiversity; this can assist in expanding the green infrastructure network.	The site does not adjoin a green corridor but it adjoins existing GAA pitches which were recently given planning permission for upgrade. The landscape proposals include will make a significant contribution to the city's green infrastructure network owing to the use of a construction compound as a residential and public open space development.
	Landscape works should be integrated with sustainable drainage system.	Tree pits are proposed on the site in addition to a storm water attenuation tank which is laid under the southern portion of the public open space as seen on drawing SHB3-WHL-AR-MA-0001
	Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety.	The landscape masterplan drawing no. SHB3-WHL-AR-MA-0001 sets out the planting proposals in the scheme. It differentiates public, communal and private realms.

Trees

Table 5: Trees Standards

Standard	Description	Development Response
Existing Trees	Tree surveys must be submitted where there are trees within a proposed application site, or lands adjacent to an application site that could influence or be affected by the development.	A tree survey is submitted. Please refer to drawing 21536_W-T_101. There are no trees on the part 8 site.
New trees	DCC encourages and promote tree planting in development proposals.	Extensive tree planting forms part of the landscaping proposal landscape masterplan drawing no. SHB3-WHL-AR-MA-0001. Approximately 110 trees will be planted.

Public Open Space

Table 6: Open Space Standards

Standard	Description	Development Response
All developments	There is a requirement of 10% specifically for all residential schemes.	This requirement is superseded by the Z12 zoning requirement to provide 20% of accessible public open space. Public open space proposal totals 23% of the net site area.
Indoor recreational facilities	Where there is evidence that sufficient public open space already exists in the locality, consideration will be given to the provision of indoor recreational facilities with public access for residents and workers in the vicinity.	Although this does not apply to the scheme, a community room is also proposed in Block A.

Density Standards

The CDP notes that the density standards are guided by the *Sustainable Residential Development in Urban Areas Guidelines*. Where higher densities are proposed, proposals must demonstrate how it contributes to place-making.

The proposed density is 95 uph. This accords with the provisions of the Sustainable Residential Development in Urban Areas Guidelines.

Plot Ratio

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

Plot ratio applicable to Z12: 0.5-2.5

The proposed plot ratio is 0.92.

Site Coverage

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

Site coverage applicable to Z12: 50%

Higher site coverage may be permitted in certain circumstances:

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

The proposed site coverage is 20%. There are constraints with the Dublin Port Tunnel and the requirement to provide for 20% public open space.

Building Height

Section 16.7.2 of the CDP sets out areas suitable for higher buildings. Whitehall is located in the Outer City where a height of 16m applies. While there is scope for buildings of up to 24m in height for sites within 500 m of existing and proposed Luas, mainline, DART, DART Underground and Metro stations, such policy provision does not apply to the subject site. Plant, flues and lift overruns are not included in the height of the building as long as they are set back and screened properly and do not overshadow or contribute to loss of natural light beyond that of the main structure. The Development Plan states that heights stated in the low-rise category such as Outer City are maximum heights. Heights will be subject to assessment dependent on the context.

The proposed blocks are 16.5m high at parapet level or 15.9m high at roof level. This complies with the development plan. Given the surroundings of the site, which is well removed from other existing properties, it will not overshadow or contribute to loss of natural light on existing properties.

In addition, as noted in previous sections, a daylight and sunlight analysis report has been prepared as part of the part 8 application. It assesses whether the proposed units and courtyard would avail of adequate daylight. As demonstrated in the report, it will also not impact on the residential amenities of prospective residents.

Access for All

DCC has regards to the National Disability Authority’s *Building for Everyone: A Universal Design Approach* and the UK Lifetime Homes Standards and refers to Part M of the Building Regulations.

11 no. units have been designed to Universal Design Standards or a total of 13%. To cater for various family units a mix of apartment types are provided - 4no. 1 bed, 3 no. 2 bed and 4 no. 3 bed is proposed. The 1 bed UD are provided at ground floor and a part M compliant lift and UD common circulation areas ensures access to all facilities is available form upper floor units.

In addition. All apartments are designed to be compliant with Part M of the Building Regulations and feature level access with flush thresholds to front entrances and rear patio doors.

Roads and Services

DCC has regard to the *Design Manual for Urban Roads and Streets*. In addition, all developments must be designed to taken-in-charge standards.

The development was designed applying the principles of DMURS as discussed in section 4.2.4 of this report.

All services must be provided underground. Pipes, cables, etc must be grouped together as far as practical. All services will be underground.

Sustainable Neighbourhoods

Table 7: Requirements for Large Developments

Standard	Description	Development Response
Developments of 100+ units or more	An Urban Design Statement shall be included.	The development falls below 100 units. Notwithstanding this, a design statement is included.

5.1.4 Residential Quality Standards – Standards Applicable to the Provision of Houses

In relation to houses, the standards outlined in Quality Housing for Sustainable Communities apply. The HQA prepared by Coady Architects shows compliance of the units with the guidelines.

Private Open Space

There are no houses proposed, these standards do not apply.

5.1.5 Parking

The CDP contains the applicable maximum standards for car parking as follows:

Table 8: Maximum Parking Standards

Standard	Description
Car Parking Zone 3	Residential: 1.5 spaces per dwellings
Cycle Parking	Residential: 1 per unit Additional requirements for visitor parking to be decided on a case-by-case basis.

The justification for the parking provision was discussed in previous sections of this report.

6 Transportation and Traffic

The following reports have been prepared and accompany the documentation:

Traffic and Transportation Impact Assessment:

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

- *The traffic impact at all junctions is below the thresholds where a TTA would normally be required. The majority of the impact as a result of the proposed development in terms of volume is less than 5% of the individual turning movements at each junction.*
- *The proposed development is considered to have a low traffic impact based on its proximity to access public transport and sustainable modes of transport to local amenities and Dublin City Centre.*
- *The proposed development is within an area that is proposed to see an increase in public transport. The NTA - Transport Strategy for the Greater Dublin Area 2016 – 2035 when fully implemented, combined with the proposed New Metro North line which, should it be constructed, will give greater access to public transport from the proposed development. The NTA - Transport Strategy for the Greater Dublin Area 2016 – 2035 also proposes improvements to bus infrastructure that will benefit the proposed development. A Core Bus Network is proposed which includes improvements to bus infrastructure aimed at providing a continuous priority bus movement that will serve this proposed development. The NTA Greater Dublin Area Cycle Network Plan has also identified the Whitehall area as a primary area for proposed cycle routes to Dublin City Centre and surrounding areas.*

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

Mobility Management Plan:

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

The MMP also provides a rationale for the 0.58 parking ratio proposed for the development.

Road Safety Audit Stage 1 and Stage 2 Report

A Road Safety Audit took place during September 2021 and comprised an examination of the documents provided by the designers. The Road Safety Audit Stage 1 and Stage 2 Report examined the scheme and this report is submitted as part of this part 8 documentation. Seven general items were identified as road safety issues and recommendations for each were

provided. The general problems identified have been noted in this report together with associated safety improvement suggestions, which the road safety audit team recommended should be studied for implementation.

7 Drainage and Water Supply

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

Drainage systems

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

This is incorporated into the drainage design. See Drawing No.s SHB3-WHL-CS-DA-DA002-01 Foul and Storm Water Network and SHB3-WHL-CS-DA-DA002-02 Storm and Foul Water Network.

SuD's measures are included, as discussed in the relevant sections discussion the CDP. Sustainable Drainage Systems (SuDS) were considered for the site, in line with recommendations of Greater Dublin Strategic Drainage Strategy (GDSDS) and include a green roof and permeable paving. The Drainage and Watermain Design Report by RPS sets out rationale and calculations for same. A Confirmation of Feasibility was secured from Irish Water is included.

Flood risk

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

S108: All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA)

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

8 Environmental Considerations

8.1 Appropriate Assessment

An appropriate assessment screening report was prepared by NM Ecology. It considers that the site is not located within or adjacent to a Natura 2000 site and that *‘Potential indirect impacts on designated sites were considered within a 5 km radius, but no potential pathways for indirect impacts were identified.’*

On this basis, it concludes that:

‘it can be excluded on the basis of objective scientific information following screening, that the plan or project, individually or in combination with other plans or projects, will have a significant effect on a European site. Therefore, we conclude that Appropriate Assessment is not required.’

8.2 Ecological Impact Assessment

An ecological impact assessment report was prepared by NM Ecology. It concludes that:

‘as there are no important ecological features at the Site, there is no risk of negative ecological impacts’.

8.3 Environmental Impact Assessment Screening

An Environmental Impact Assessment (EIA) preliminary examination report has been prepared by MacCabe Durney Barnes in accordance with the Guidance on Environmental Impact Assessment Screening – Practice Note (OPR, 2021) and accompanied the Part 8 documentation.

It concludes that:

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

8.4 Flood Risk Assessment

The drainage design includes the provision of attenuation under the open space to the south east corner of the site as can be seen on drawing no SHB3-WHL-CS-RPS-DR-DA002-01 Storm and Foul Water Network Layout.

A review of the OPW flood maps did not identify a risk of flood risk on or near the subject site.

9 Other Considerations

9.1 Housing Need

Section 16.10.1 of the CDP notes that in general apartment development should contain:

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

The plan states that *‘these maximum and minimum requirements... may not apply to certain housing needs and/or where there is a need for a particular form of housing for older people and students having regards to the housing strategy.’*

Whitehall is located within Housing Area E. As can be seen in the table below extracted from the Housing Allocations Quarterly Report October 2021, there is a significantly higher demand for 1-bed units in Whitehall.

Tables 3 (a)(b)(c) - OCTOBER 2021 **WAITING LIST** FIGURES BY BEDSIZE REQUIREMENTS AND AREA

October 2021 HOUSING Waiting List figures by Bedsize Req											TABLE 3 (a)
Bedsize Required	Area B	Area D	Area E	Area H	Area J	Area K	Area L	Area M	Area N	Area P	Grand Total
1 Bed	2482	455	1418	1191	791	780	757	643	738	210	9465
2 Bed	1009	188	512	198	407	358	121	140	148	35	3116
3 Bed	381	59	217	96	124	147	49	42	77	28	1220
4 Bed	25	8	26	12	12	22	14	5	14	5	143
5 Bed	1	2	2	1	4	6	2	1	1		20
Grand Total	3898	712	2175	1498	1338	1313	943	831	978	278	13964

October 2021 TRANSFER Waiting List figures by Bedsize Req											TABLE 3 (b)
Bedsize Required	Area B	Area D	Area E	Area H	Area J	Area K	Area L	Area M	Area N	Area P	Grand Total
1 Bed	1273	240	921	831	489	386	693	454	423	141	5851
2 Bed	2205	418	1251	504	745	618	402	337	269	92	6841
3 Bed	942	182	570	235	311	341	184	145	117	45	3072
4 Bed	83	17	57	25	39	57	18	20	14	7	337
5 Bed	7	4	8	1	5	1	1		1	1	29
Grand Total	4510	861	2807	1596	1589	1403	1298	956	824	286	16130

October 2021 COMBINED Waiting List figures by Bedsize Req											TABLE 3 (c)
Bedsize Required	Area B	Area D	Area E	Area H	Area J	Area K	Area L	Area M	Area N	Area P	Grand Total
1 Bed	3755	695	2339	2022	1280	1166	1450	1097	1161	351	15316
2 Bed	3214	606	1763	702	1152	976	523	477	417	127	9957
3 Bed	1323	241	787	331	435	488	233	187	194	73	4292
4 Bed	108	25	83	37	51	79	32	25	28	12	480
5 Bed	8	6	10	2	9	7	3	1	2	1	49
Grand Total	8408	1573	4982	3094	2927	2716	2241	1787	1802	564	30094

Tables 4 (a)(b)(c) - OCTOBER 2021 **WAITING LIST** FIGURES BY FAMILY SIZE AND AREA

9.2 Waste Management

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

In accordance with SIO16, the proposed development includes the provision of adequately sized recycling facilities. Bin stores are located in the courtyard of the apartment block. Bin stores of the duplexes and houses are located to the front of the unit in secure, shielded storage to avoid being visually intrusive. This provides for ease of access by residents as they leave the building, for disposal of waste and recycling. Bin stores are screened and otherwise open to the air and may be washed as required.

SI017: To promote the re-use of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000 sq.m, a materials source and management plan showing type of materials/proportion of re-use/recycled materials to be used shall be implemented by the developer.

There is no demolition material to arise from the proposed development as the site is in a green space.

9.3 Lighting

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

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

These policies may be addressed together. Public lighting along the internal street, the service path to the east, the public open space and the internal courtyard has been designed to minimise light spillage or pollution in the surrounding environment and residential amenities in accordance with SI26 and SI27. Public lighting plans are submitted as part of this part 8 application. Drawing No. SHB3-WHL-ME-SMK-DR-2746-6053 Public Lighting Ducting and Drawing No. SHB3-BAL-ME-SMK-DR-2746-6054 Public Lighting Calculation illustrates the proposed new columns and luminaires. The public lighting design shall fully comply with BS5489:2013 lighting class P3.

10 Conclusion

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

The site provides an important frontage on Collins Avenue at its junction with the Swords Road. The proposed development will open the vista towards the south and utilise a brownfield site to provide much needed smaller housing units to meet social housing needs in the Council's Housing Area E. It will also provide 23% of public open space in accordance with the Z12 zoning of the site. The development of the brownfield will allow the creation of an active frontage.

The proposed development will contribute to a diversification of housing tenure in Whitehall and make a positive contribution to the area owing to the provision of high quality landscaped open space.

