

# Planning Statement

Social Housing Bundle 4, Development at Stanley Street,  
Dublin 7

Dublin City Council

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# 1. INTRODUCTION

## 1.1 Background

This planning report was prepared by MacCabe Durney Barnes on behalf of Dublin City Council, to accompany a Part 8 proposal of 167 no. residential units on a site of circa 1.15 ha in area, located at the Dublin City Fire Brigade Maintenance Depot and the Dublin City Council Mechanical Division, Stanley Street, Grangegorman Lower, Dublin 7.

Part XI of the Planning and Development Act 2000 as amended and the procedures set out in Part 8 of the Planning and Development Regulations 2001 as amended, relate to development by, on behalf of, or in partnership with the Local Authority. Under Section 178 of the Planning and Development Act 2000, as amended, a Local Authority is entitled to carry out its own development, provided it does not materially contravene the Development Plan.

## 1.2 Background to the Part 8 Application

The Social Housing Public Private Partnership (PPP) programme consists of the design, construction, financing and maintenance of approximately 1000 homes as part of Social Housing Bundle 4 project bundles of social housing developments on sites around Ireland to be delivered by PPP. The Department of Housing, Local Government and Heritage is the approving authority for the programme with the NDFA as financial advisor, procuring authority and project manager.

The current bundle No. 4 includes eight sites, all the Dublin City Council area. The PPP model of delivery has been selected as an appropriate means of securing the delivery of social housing. Each site includes a mixture of housing typology (for example apartment, duplex, house) and site development works.

The Stanley Street site includes apartment and duplex units. The development will be tenanted from Dublin City Council's Housing Lists, in accordance with the scheme of allocations. The proposed development has been designed by the National Development Finance Agency (NDFA) in consultation with Dublin City Council.

## 1.3 Structure of the Planning Report

This planning statement was prepared to accompany a part 8 application for the development of 167 residential units and 277.54 sqm childcare facility and 552 sqm of community, arts and cultural floorspace, at a site c. 1.15 ha located at the site of the Dublin Fire Brigade Maintenance Section and the Dublin City Council Mechanical Division at Stanley Street, Grangegorman Lower, Dublin 7.

- The report is structured as follows:
- It provides a description of the site and surrounding area, and of the proposed development.
- It outlines how the development complies with:
  - National policy
  - Regional policy; and
  - Local policy.
- It gives an overview of environmental matters, including ecology, environmental impact assessment and appropriate assessment.

## 2. SITE LOCATION AND CONTEXT

### 2.1 Site Location

The part 8 site consists of the Dublin Fire Brigade Maintenance Station and Dublin City Council Mechanical Division, which is due to be relocated. The site is broadly located north of the Liffey in Dublin 7. The site is an infill and brownfield site located between Stoneybatter and Grangegorman Lower. The site is located around 2km from Connolly Station and just under 1 km from Heuston. The site is located to the south of TU Dublin Grangegorman Campus, to the north and west of Smithfield and east of Stoneybatter. In addition to close access to the Red line Luas network at Smithfield, the site has good public transport links with a number of adjacent Dublin Bus routes. There is also a well-developed cycleway infrastructure, with close access to the Dublin Bikes cycle share scheme, amongst others. There is also wide range of facilities accessible within a short walk of the site. Please refer to the Social Infrastructure Audit for details.

The site is primarily accessed via Stanley Street to the south. The site avails a generous frontage to Grangegorman Lower to the east. There is currently secondary vehicular and pedestrian access to this facade. The site is gated at the termination of Stanley Street. The site is currently operational and features a number of buildings and structures in current use.

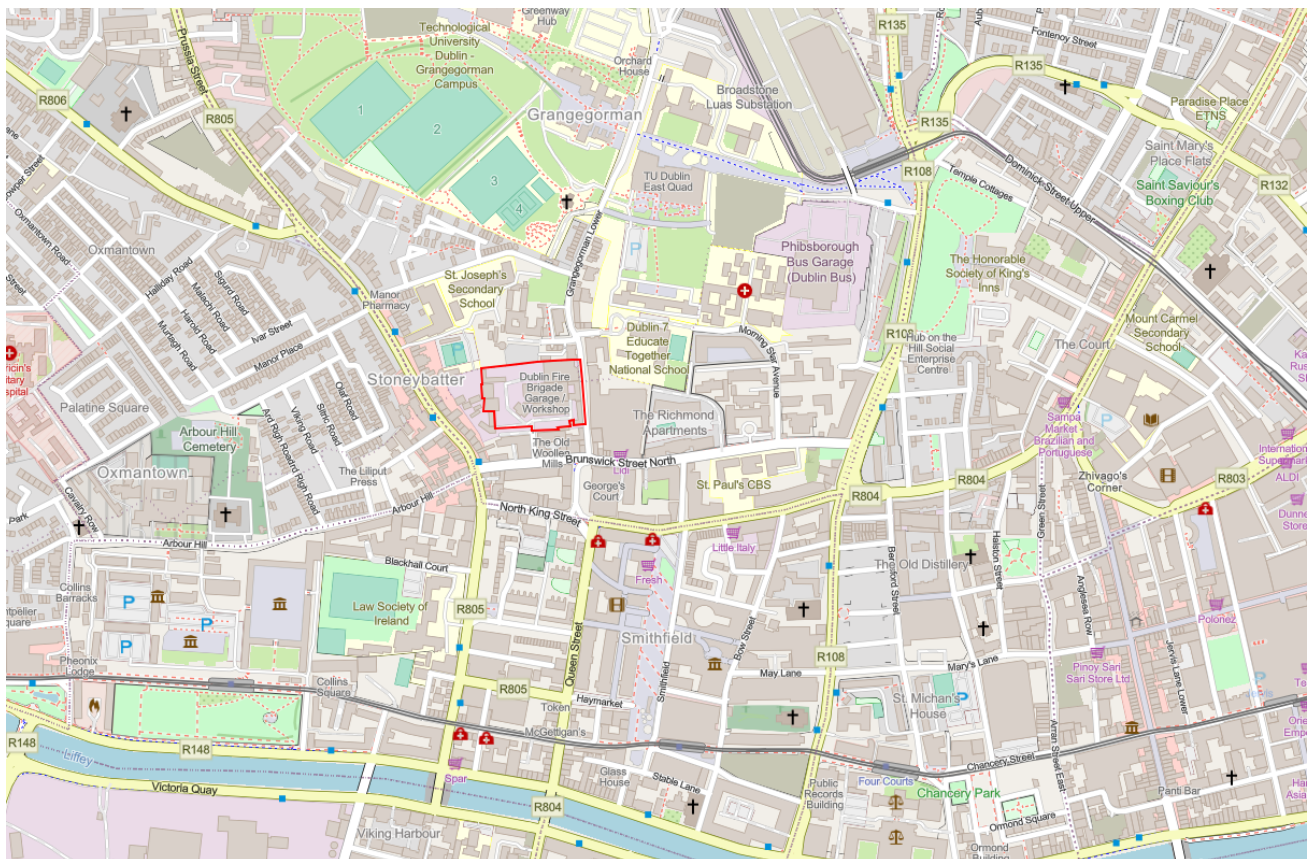


Figure 1: Site Context

### 2.2 Site Description

The site is bound to the north by the rear of Stanhope Street. Stanhope Street is a residential street. The units backing onto the site are two-storey houses and the landscape open space of Stanhope Green. Stanhope Green

was the Sisters of Charity Convent and is now used as apartments. The building is listed on the National Inventory of Architectural Heritage (NIAH) as being of architectural, artistic, historical and social special interest. It was built in 1870. Access to the complex is via Stanhope Street and is defined by an arch gateway, which is also erected in 1870. The gateway is also listed on the NIAH and is of Tudor style. It is closed off by wrought iron gates, one for vehicles and a smaller one for pedestrians. The whole complex is private and is not used as a throughfare. Also of note are a number of mature trees, within the adjacent property along the northern site boundary. The root protection area of these trees fall within the site footprint.

A student accommodation complex, Ardcairn House, is located adjacent to the site on Grangegorman Lower to the east. The six-storey high building was built in the early 2020s. A number of retail/commercial units are located at ground floor and some of these are occupied and include a gym chain and a pizzeria. There are additional retail units between the student building and the junction of Grangegorman Lower and Brunswick Street north. Immediately abutting the site to the east, forming part of the same urban block, is 111 Grangegorman Lower, which is currently used by a catering company. The site does not have any heritage protection. It is an old warehouse which appears to have been used by other food industry companies in the past. The warehouse is red-brick building. The site at the corner of Grangegorman Lower and Brunswick Street is occupied by a two-storey house.

The Lavanda's restaurant fronts Brunswick Street north. It is a two-storey high red brick building. Its gable has no window onto Grangegorman Lower. Adjacent to the restaurant is a car parts shop, which is one-storey high and of no architectural or heritage merit. The outlook is poor, with the wall topped with barbed wire. The plot at the corner of Brunswick and Stanley Streets is a two-storey building arranged around an internal courtyard. This building is accessed directly via Brunswick Street. Its façade is a mix of stone and render. The building is currently used by a number of commercial users. It was originally used as maltings and is on the NIAH and the Record of Protected Structures.

Stanley Street is cobbled from the junction with Brunswick to the entrance of the fire compound. In the centre of the street are cast iron Dublin Corporation tram tracks which were laid around 1900. These are listed on the NIAH as being of regional significance. The tracks formed part of the Dublin Corporation waste disposal system for the city and led to a destructor plant which was located on the application site. The site is closed by a tall gate and is fenced off by a boundary wall. On the western side of Stanley Street is a five-storey building. It consists of residential over commercial units. This building is separate from the part 8 site by a service lane. This apartment complex occupies the main northern frontage of Brunswick Street.

Stable Lane continues westwards at the end of Stanley Street, and runs parallel with approximately 40% of the site's southern boundary. However, this laneway has not been taken in charge, and has been gated by a third party. Otherwise, the southern boundary backs on to a number of properties accessed from Brunswick Street North, including the 'Brunswick Court' apartment building and 'The Maltings' commercial premises.

The west of the site is the rear of the units fronting Stoneybatter. There is a development site under construction immediately adjacent to the west. The development will consist of student housing and is detailed in the planning history of the Planning Statement. There is a multi-game area (MUGA) to the north-west of the site.





**Figure 2: Site Context**

The site is currently operational, and features a number of buildings and structures in current use. The site itself is tarmacked and consists of a series of industrial type buildings with car parking. The site falls from north to south, with a fall of circa 2m within the site. There is no coherence in building type within the Part 8 site. These are either pitch roof with corrugated iron or flat roofs. There is a L-shaped building to the east of the site fronting directly onto Grangegorman Lower. This structure is the last remaining structure to survive from the 19th century Scavenging Depot, and stands at the south-east corner of the proposed development site. It dates from around 1875 and originally extended further north along Grangegorman Lower, and further east along the southern edge of the development site. The pedestrian environment along this frontage is poor, the footpath being in poor state and requiring upgrade. The building at the north-east corner of the site consists of a large roll-up garage door. This outlook of the part 8 site onto Grangegorman Lower is generally poor and unkept.

## 2.3 Transportation

The site is served by Bus stop no. 1714 and no. 1648 along Manor Street. A number of Dublin Bus routes travel this route including bus no. 37, 39, 39A and 70. Bus no. 39 serves travel between Burlington Rod towards Ongar at a frequency of c.30 minutes. In terms of no. 37, this route serves travel between Baggot Street/ Wilton Terrace towards Blanchardstown Centre, generally at a frequency of c.20 minutes weekdays and at 20-30 minutes during weekends. Bus no. 70 serves travel between Burlington Road towards Dunboyne at a frequency of hourly at off-peak times and c.10 minutes during peak hours.

The site is also located within a 10 minute walk from Arran Quay bus stop no. 7854 which offers a wider variety of services, including no. 52, C1, C2, C3, C4, C5, C6, P29, X25, X26, X27, X28, X30, X31 and X32. Many of the aforementioned routes were introduced under phase 2 of the BusConnects Network Redesign. This saw the

introduction of the C spine (C1, C2, C3, C4), route 52 and eight peak only routes (P29, X25, X26, X27, X28, X30, X31 and X32). Two night time routes (C5 and C6) were also introduced.

Also along Arran Quay is bus stop no. 7453, which offers services of no. 26, 37,39,39A, 51D, 60, 69, 70, 145 AND Dublin Express 782.

The Luas red line and cross city are also located in close proximity to the subject site. The Luas Cross City, Broadstone DIT stop is located within a 12 minute walk from the site and the Luas Red Line, Smithfield Luas stop is within an 8 minute walk.

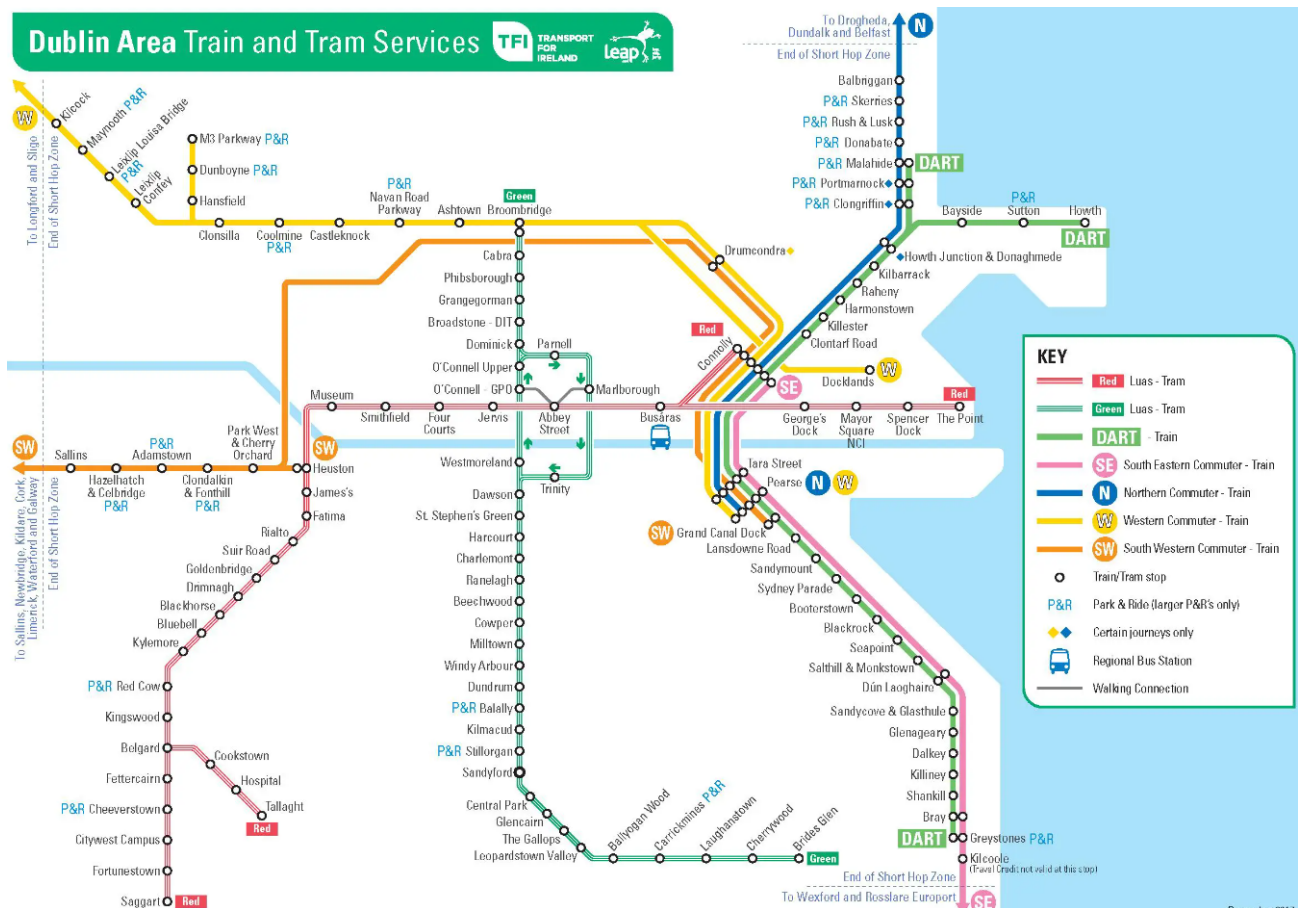
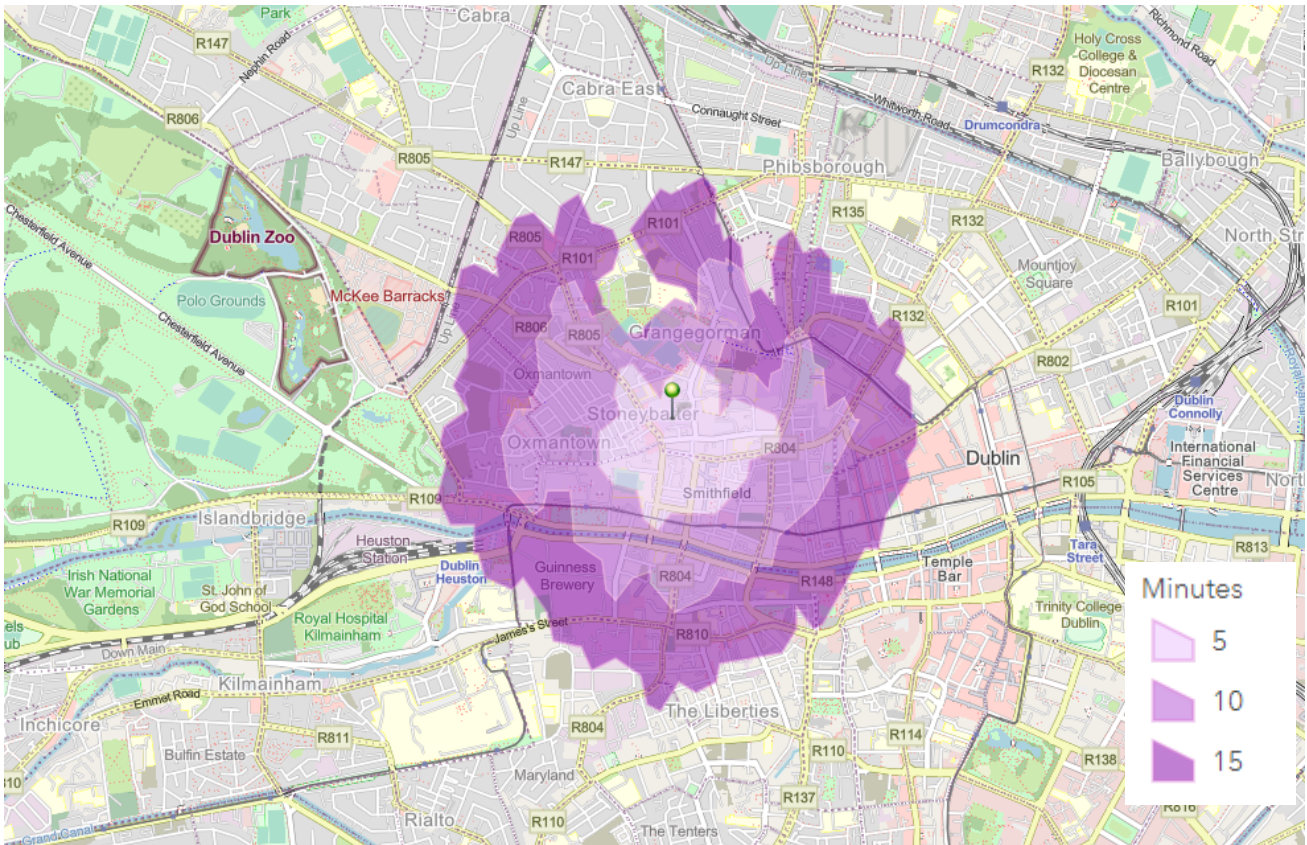


Figure 3: Existing Luas Line in the context of the Subject Site (Source: TFI, 2017)

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

### 2.3.1 Accessibility

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



**Figure 4: Walkability Patterns in 5,10 and 15 minute intervals (Source: ArcGIS)**

### 2.3.2 BusConnects

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

The site is located along the B-Spine serving Blanchardstown SC-City Centre-UCD. During the weekday, this spine operates generally every 4 minutes. In addition to the B spine, the C-Spine is within a 10 minute walk from the site along Arran Quay.

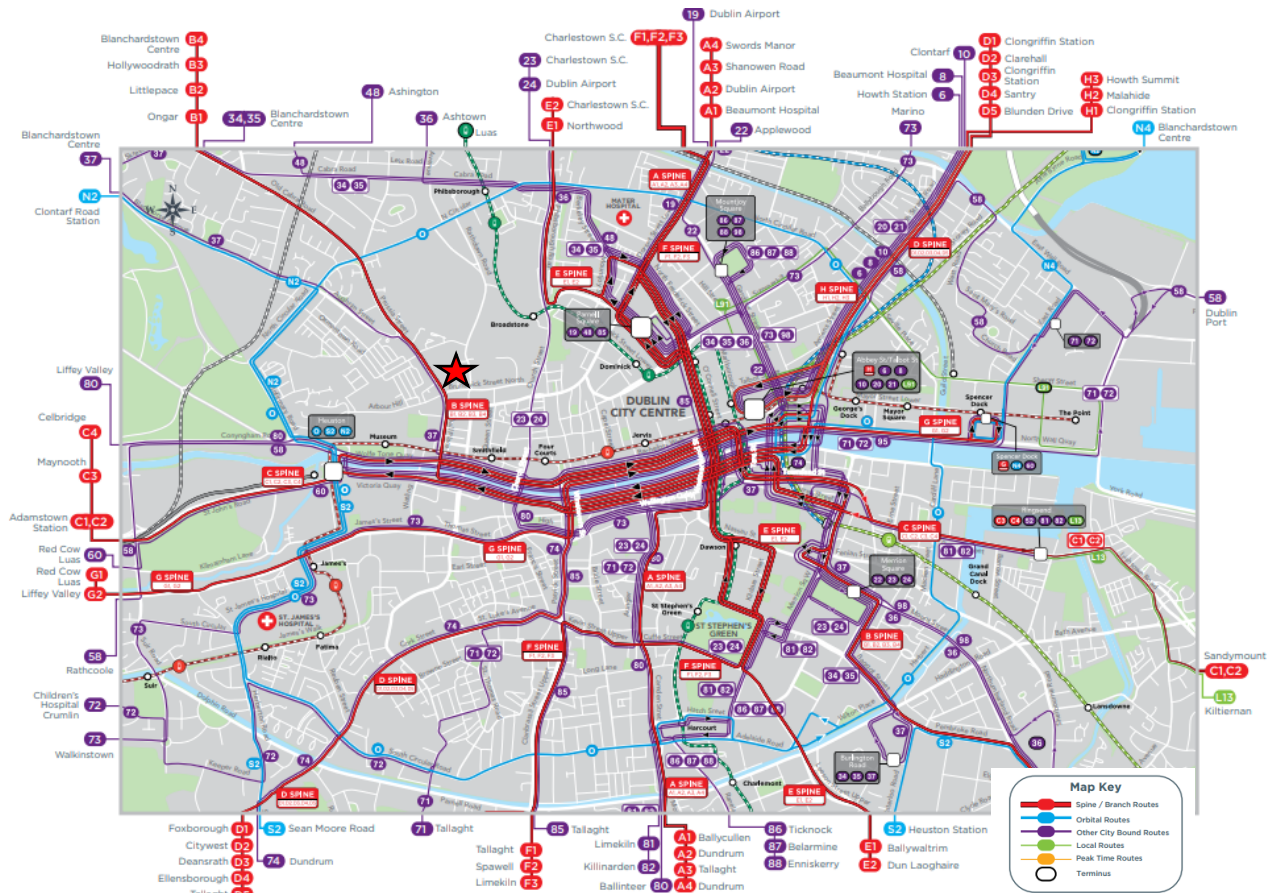


Figure 5: City Centre Area BusConnects Map (Source: NTA, 2022)

### 2.3.3 Cycling

Improved cycling facilities are proposed as part of the proposed Bus Connects Core Bus Corridor project along Main Street. The Dublin City Council’s Active Travel Network Programme is set to expand the existing network from 10km to 310km across the city. The proposed programme illustrated below demonstrates that the development site will be located in close proximity to high quality active travel infrastructure, which will allow for greater ease of accessibility to social and community infrastructure identified in this report.

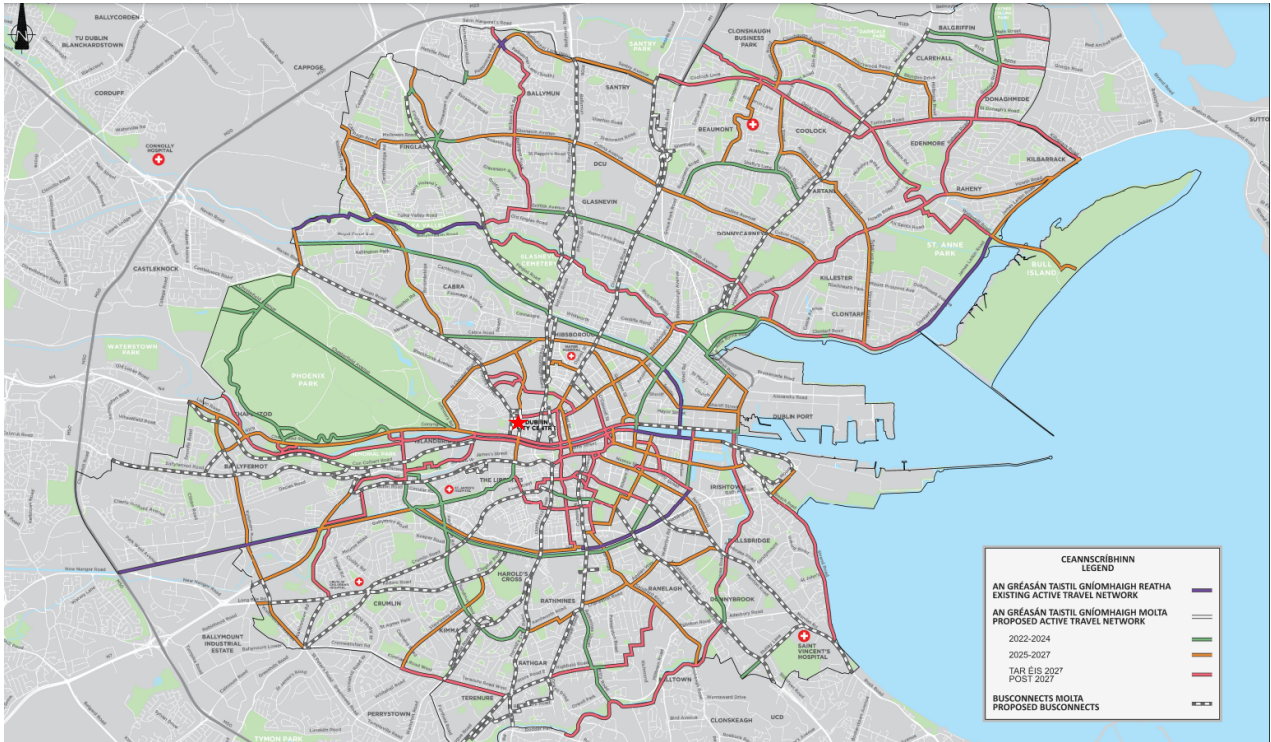


Figure 6: Proposed Active Travel Network Post 2027 (Source: DCC)

### 3. PLANNING HISTORY

#### 3.1 Subject Site

There is no planning history on the part 8 site.

#### 3.2 Surrounding Area

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

##### 3.2.1 Grangegorman Lower/ Grangegorman

PA. Reg. Ref. GSDZ4861/23: The development is located in the northwest of the Grangegorman SDZ and is referred to as the 'West Quad. The development will consist of the construction of a 2-6 storey building to accommodate educational facilities. Facilities will include lecture theatres; teaching learning / research rooms and spaces; IT labs; meeting rooms; an exam / conferring/events hall; viewing gallery; staff offices; communal spaces; a café and ancillary facilities and service. Further information was requested on 31<sup>st</sup> January 2024 and submitted by the applicant on 3<sup>rd</sup> April 2024.

PA. Reg. Ref. GSDZ4543/23: Office and Mixed Use development at a site located within the Grangegorman SDZ, bound by Broadstone (RPS 2029) and the Luas line to the north/ east, Dublin Bus Depot (RPS. 2029) to the south/ east and TU Dublin East Quad and Printmaking Workshop and the Clock Tower (RPS. 3288). The development consists of the construction of 2 no. blocks of 51,955 sq.m over a single basement, which will include lobby, retail/ café uses, community space, office space ranging between 8 to 12 storeys. The application was lodged on 5<sup>th</sup> April 2024 and a decision is pending.

PA.Reg.Ref GSDZ3092/21: Temporary retention permission for development at a site comprising the Dublin 7 Educate Together National School, Fitzwilliam Place, Grangegorman Lower, Dublin 7, located within the Grangegorman Strategic Development Zone (SDZ). The development consists of the temporary retention and use of the existing Dublin 7 Educate Together National School which was granted temporary permission under 4291/08 and extended under GSDZ3263/14 and GSDZ3653/17. This application seeks to retain the temporary school for a further 3 years while the construction of the permanent school is ongoing. The temporary school comprises: 1) A two storey 16 classroom primary school of approx. 2284 sqm (including all ancillary school accommodation/layout/storage); 2) 2 no. ball courts, a junior play area, a dedicated special needs play area. Permission was granted on the 27<sup>th</sup> August 2021.

PA.Reg.Ref GSDZ2529/19: Development relating to the reuse of the Lower House for educational related uses including canteen and café, student support services and facilities at a site c.0759 ha in the south east of Grangegorman Strategic Development Zone at the Lower House. Permission was granted on 17<sup>th</sup> July 2019.

PA.Reg.Ref 3000/15: Redevelopment of a site at the corner of Grangegorman Lower and Fitzwilliam Place North. The proposed development consists of the construction of 132 no. bed spaces student residential accommodation in a 7-storey high building over basement. It also includes the provision of a coffee shop. Planning permission was granted on the 7<sup>th</sup> January 2016. The development has now been constructed.

### 3.2.2 Stoneybatter

PA.Reg.Ref.4026/23: Change of use of existing former school to office space and residential apartments. The development also includes the increase of building height to allow for a rooftop 35 sqm communal amenity area. The development is located at 12 Manor Street, D07 TH59. Additional information was requested on the 18<sup>th</sup> August 2023 and further information was submitted by the applicant on 28<sup>th</sup> March 2024.

PA.Reg.Ref.4734/18: Demolition of all existing structures and construction of a 5 no. storey high student accommodation with roof gardens. The development consists of 142 no. student accommodation bedspaces. It is located at no. 20 Stoneybatter and lands to the rear of no. 20-23 Stoneybatter and no. 1-2a Manor Street. Planning permission was granted on the 24<sup>th</sup> May 2019.

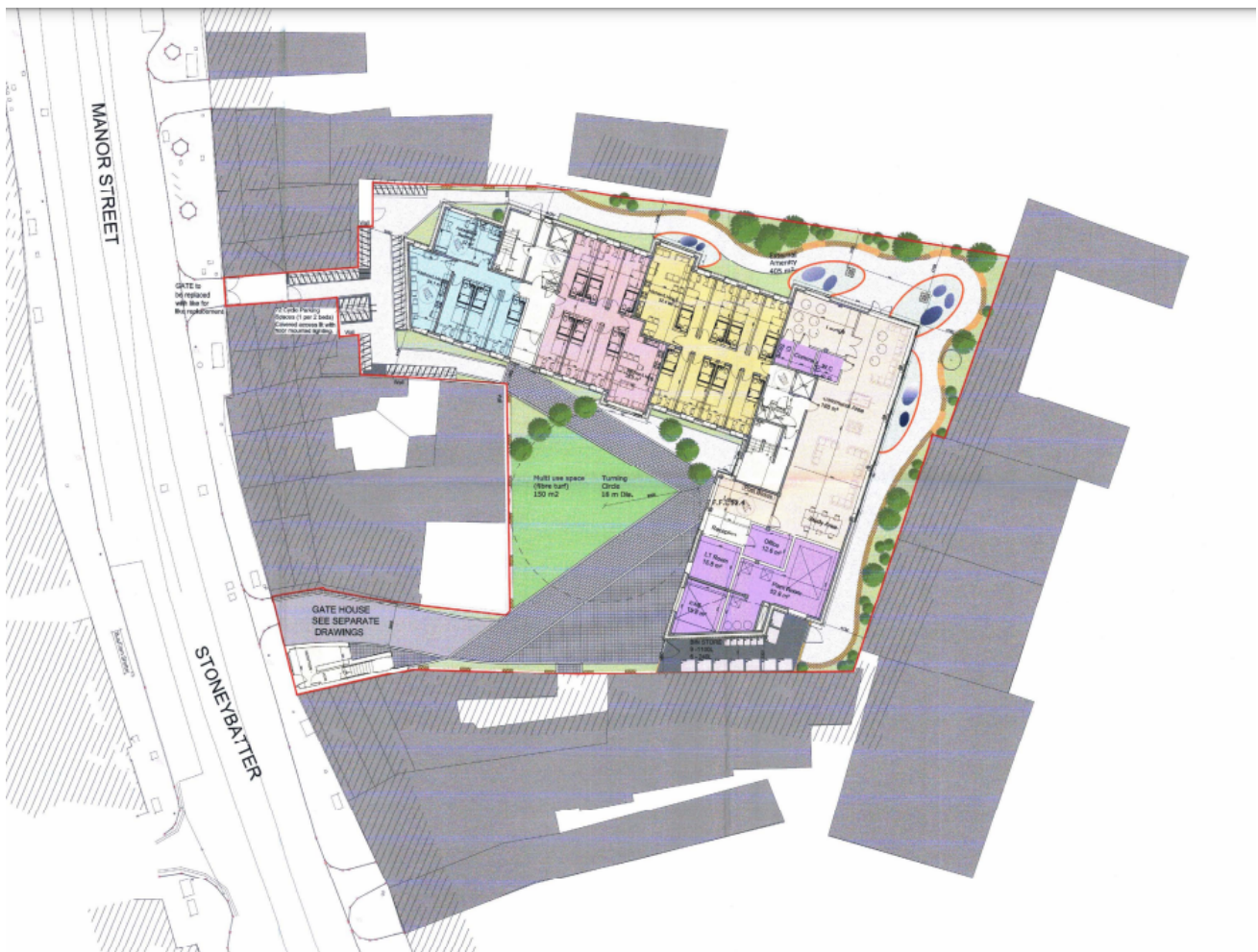
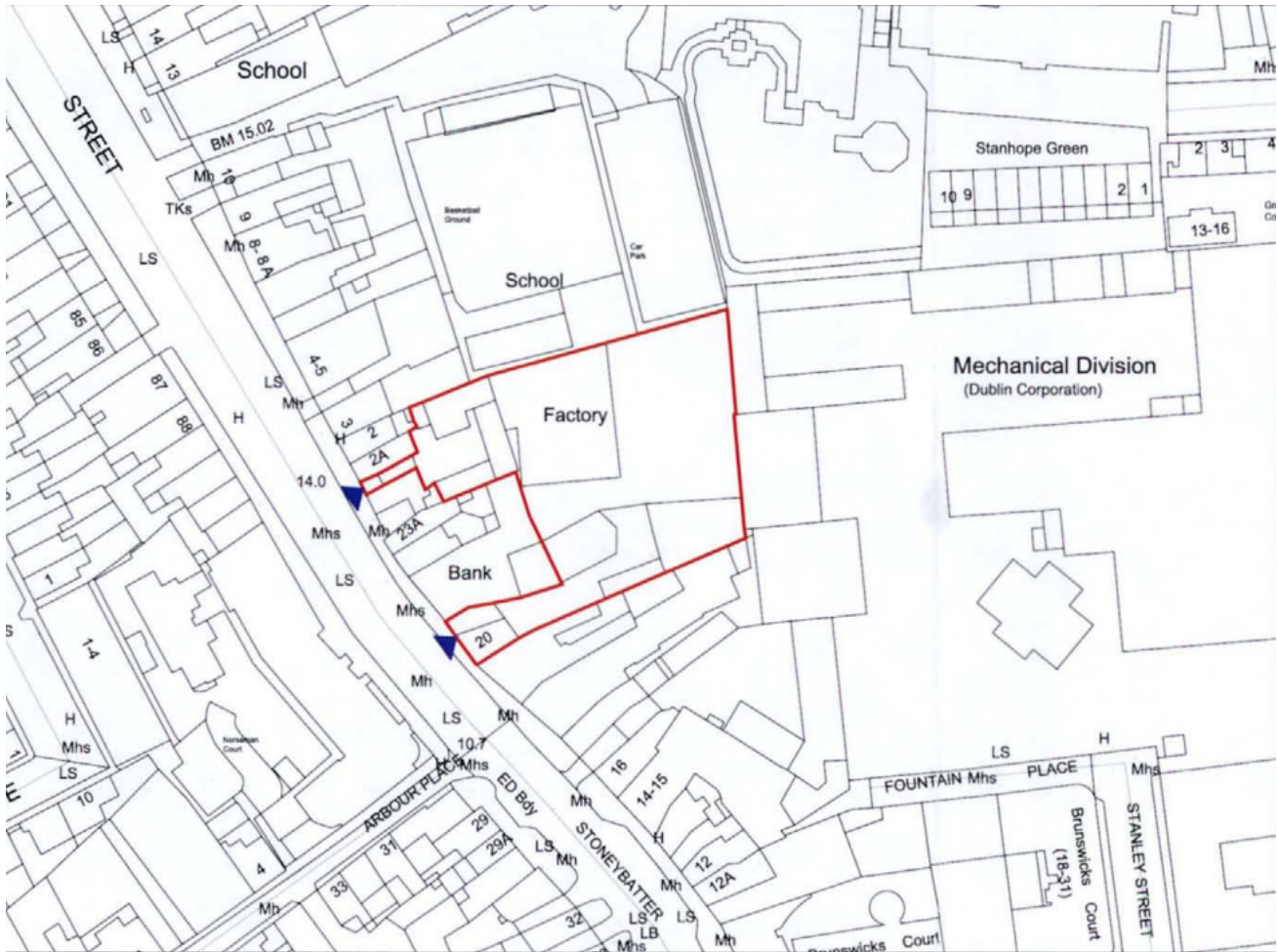


Figure 7: Site Layout (Source: Boyes Rees Architects as displayed on DCC Planning Register)



**Figure 8: Site Location (Source: Boyes Rees Architects as displayed on DCC Planning Register)**

The development is immediately adjacent to the Part 8 site.



## 4. SITE SELECTION AND CONSIDERATION OF ALTERNATIVES

### 4.1 Site Selection

The subject land is in the ownership of Dublin City Council and therefore can be efficiently to meet some of the demand for social housing arising in Dublin City. The site is located in the City Centre. There has been ongoing regeneration with numerous development sites in the area. The TU Dublin Campus at Grangegorman has been undergoing continuous development leading to the development of several student accommodation complexes in the area. There has been a push at all levels of planning policy to reuse brownfield and infill sites in central locations, so as to promote compact growth. Site selection was restricted to consideration of that land in the ownership of Dublin City Council, and which could be adequately serviced and integrated to provide much needed social housing.

Site selection has taken a plan-led approach to development having regard to the residential zoning provisions in the Dublin City Development Plan 2022-2028 (CDP). The site is zoned Z5 City Centre. There are no impediments to proceeding with the site.

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

### 4.2 Consideration of Housing Tenure and Types

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

The area is dominated by private housing with over 75% either rented or owned according to the 2022 census of population<sup>1</sup>. Just 10% of the housing stock consist of housing rented either from the local authority or from a voluntary body. With the provision of 167 units, the share of social housing in the overall stock in the area would rise from c.9% to 12.7%.

The site is located in area P of the Council's Housing Waiting List. Data from October 2023, shows that there are 9 households requiring band 1 housing (the highest priority), 147 in band 2 and a further 112 in band 3, or a total of 268 households. A further 290 are on the transfer waiting list for area P. With a combined total of 558 households, there is a strong demand for accommodation in the area. It is also important to note that around 250 of these households have been on the list for over a year.

Importantly, the housing waiting list for area P shows strong demand for one-bed units, with 78% of the list requiring a one-bed unit. Similar observations are made in relation to the transfer list, with 50% of the list seeking a one-bed unit. In this regard, the proposed development will positively respond to housing need in the area.

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<sup>1</sup> Using data extracted in relation to the Electoral Divisions of Arran Quay B, C and E, which either overlap or are adjacent to the site.

The site is located in one of the two sub-City Housing Needs and Demand Assessment (HNDA). The site is located in the Dublin 1 HNDA. Under table 37, the plan states that 'Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing & Community Services Department. Therefore, on review on the needs identified for area P, the proposed mix is acceptable.

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

### 4.3 Consultation

DCC Housing Department with the Project Architects and Local Area Office held a public information session on the 15<sup>th</sup> February 2024. The consultation was well attended by residents in the community. The Design Team considered all issues raised during the consultation event as part of the design process.

## 5. CONSIDERATION OF DESIGN

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high-quality residential development, creating a sense a place for its resident's whilst integrating into the existing built environment. The layout is particularly derived from the infill nature of the site. The site has one main frontage on Grangegorman lower but otherwise is largely in a backland location. There are residential units principally on its southern and northern sides. In recent years, student accommodation was built to the east of the site, with further development ongoing to the west. The layout and design therefore sought to both utilise the site to its optimum capacity but also to preserve existing and future residential amenities.

The layout is particularly cognisant of the proximity of the two-storey high units on Stanhope Street and therefore proposes a row of three storey high duplex block.

The site also slopes down toward the Liffey and there are numerous structures with a heritage designation in the immediate vicinity. Importantly, while there are limited trees on the part 8 site itself, there are a number of trees on the site adjacent to the north which substantial root structure. Their integrity had to preserved, meaning any proposed development on the site would need to apply appropriate separation distances.

The client brief has initially envisaged that 166 units would be provided onsite. Upon design, 167 can be accommodated without impacting on the surrounding area. The unit mix of the proposed development have been revised to reflect the current housing needs of the area based on information derived from the Dublin City Council housing waiting lists.

## 6. PROPOSED DEVELOPMENT

### 6.1 Project Description as per Public Notices

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

Notice is hereby given of the construction of 167 apartments and duplex units at a site c. 1.15 ha at the Dublin City Fire Brigade Maintenance Depot and Dublin City Council Mechanical Division, Stanley Street, Grangegorman Lower, Dublin 7. Development at the site will consist of the following:

- The demolition and site clearance of the existing buildings, sheds, warehouses and garages.
- Retention and modification of the south and east elevation of an existing structure (facing onto Grangegorman Lower) to form part of apartment Block G at the southeast corner of the site.
- Construction of 167 no. apartment and duplex units across Blocks A-K (including frontage onto Grangegorman Lower).
  - Blocks A – C consist of 71 no. apartment units (43 no. 1 bed and 28 no. 2 bed units) and ranges from 5 to 6 storeys.
  - Blocks D-G consist of 84 no. apartment units (43 no. 1 bed units, 29 no. 2 bed units and 12 no. 3 bed units) and ranges from 4 to 5 storeys.
  - Blocks H-K consist of 12 no. duplex units (6 no. 1 bed and 6 no. 3 bed units) and are 3 storeys.
- Provision of 270 long-stay and 101 short-stay bicycle parking spaces, 19 no. car parking spaces and 1 no. motorcycle parking space.
- Construction of a 277.54 sqm creche.
- Provision of 552 sqm of community, cultural and arts space located at ground floor level across Blocks B, E, F and G.
- 0.113 ha of public open space and 1350 sqm of communal open space
- Vehicular access is proposed from Grangegorman Lower and vehicular egress is proposed onto Stanley Street
- Boundary treatments, public lighting, site drainage works, internal road surfacing and footpaths, ESB meter rooms, ESB substations, stores, bin and cycle storage, plant rooms, landscaping; and
- All ancillary site services and development works above and below ground.



Figure 9: Site Layout (Source: Sean Harrington Architects)

In summary, the proposed development has been designed to provide high quality homes for a range of households. The design of the scheme is cognisant of the site topography and of the constraints imposed by the surrounding structures. It will provide a net density of 148.7 uph.

## 6.2 Detailed Description

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

Table 1: Proposal Details

Development Parameters	Summary
Parameter Site Proposal	Gross site area: 1.15 ha Net site area: 1.12 ha
No. of Residential Units (Apartments and Duplex Units)	Total: 167 units (155 no. apartments and 12 no. duplex)
Apartments	155 apartment units (86 no. 1 bed, 57 no. 2 bed and 12 no. 3 bed)

Development Parameters	Summary
Duplexes	12 duplex units (6 no. 1 bed and 6 no. 3 bed)
Non-residential uses:	552 sqm of community, arts and cultural space 277.54 sqm Creche
Density	Net density: 148.7 uph
Plot Ratio	1.63
Site Coverage	35%
Dual Aspect	94 apartment and duplexes are dual aspect. This equates to 56% of units.
Car Parking Overall	19 spaces (including 1 part M space) Parking Ratio: 0.11
Bicycle Parking Overall	Total: 371 bicycle spaces (270 no. long stay and 101 no. short stay)
Height	3-6 storeys
Public Open Space	0.113 ha
Communal Open Space	1350 sqm

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

Unit Type	1 bed Apartment	2 bed Apartment	3 bed Apartment	Total	1 bed Duplex	3 bed Duplex	Total
No. of units	86	57	12	155	6	6	12
% of Apartments / Duplex	55%	37%	8%	100%	50%	50%	100%

The proposed unit mix breakdown is tabulated below:

1 Bed unit	2 bed unit	3 bed unit	Total
92	57	18	167
55%	34%	11%	100%

## 7. PLANNING POLICY

### 7.1 National Policy

#### 7.1.1 National Planning Framework

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

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

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

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

National Policy Objective 3b seeks to "*Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*" The proposed development accords with objective (3a and 3b) in the provision of new social homes within an urban context.

National Policy Objective 4 states "*ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being*". The proposed development accords with this objective and provides a defined strong urban frontage on Grangegorman Lower. The proposed layout caters for communal and public open space. It includes 552 sqm of community, arts and cultural space and 277.54 sqm creche which will serve both prospective and existing residents to allow for the creation a cohesive community in the development.

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

Given the city centre location, the provision of 167 homes at the Stanley Street site is considered adequate.

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

The proposed development accords with this policy and the scheme provides for homes that includes 45 no. universally designed units.

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

The proposed development has a density of 148.7 uph with heights ranging from 3 to 6 storeys. The proposed height is aligned with recently permitted heights in the area. While the development has a main frontage on Grangegorman Lower, it has an infill nature. Its most recent use is at odds with prevailing uses in the area. The proposed development is therefore considered to positively respond to the objective.

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

### 7.1.2 Climate Action Plan 2024

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

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

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

All units provided will be to the appropriate standards. Please refer to Climate Action Energy Statement, Sustainability & Part L Report accompanying this application. We acknowledge that the site is inside a number of solar Safety Zones and it is generally recommended that AirNav Ireland shall be consulted if more than 300m<sup>2</sup> solar panels/PVs are being proposed. The proposed scheme falls below this threshold and therefore consultation is not applicable to the scheme.



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

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

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

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

## 7.2 Ministerial Guidelines

A number of national planning guidelines may be considered.

- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Delivering Homes, Sustaining Communities (2004) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities (2007)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Urban Design Manual – A Best Practice Guide (2009)
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Street (2019)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018)
- Design Manual for Quality Housing (2022)

### 7.2.1 Guidelines for Planning Authorities on Childcare Facilities (2001)

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

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

The provision of 167 units, 92 of which are one-bed units means that the 75-unit threshold set out by the Childcare Facilities Guidelines for Planning Authorities (2001) is met. Having regard to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2020, one bedroom apartment units should not generally be considered to contribute to a requirement for childcare provision (and subject to location this may also apply in part or in whole to two bedroom). In total, this results in 75 no. 2 and 3 bed units that may generate demand for childcare spaces.

A Social Infrastructure Audit was prepared by MacCabe Durney Barnes and accompanies the part 8 application. The Dublin Childcare Committee was consulted which identified childcare providers within a 1 km radius. There are 6 no. facilities in operating in the area with a total capacity of 174 children. It was also found that there was no available spaces in the area to accommodate any demand generated from the proposed development. A 277.54 sqm creche is proposed as part of this development which is capable of accommodating 49 no. children and 12 no. staff. The proposed creche will provide ample capacity to absorb potential demand arising from the development.

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

Chapter 4 indicates that in the planning and design of the scheme, the architect should:

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

A Design Statement accompanies the Part 8 documentation. The environmental and visual quality of the area as a whole will be enhanced significantly by the development of a vacant site. The site is currently used as Dublin Fire Brigade Maintenance Section and the Dublin City Council Mechanical Division. The redevelopment of the site to residential use will achieve an efficient reuse of finite land located within the city centre.

The proposed development has been designed to be cognisant of prevailing height and surrounding residential amenities. It will enhance the western frontage of Grangegorman Lower which currently has a poor outlook with limited to no interaction with the street. The proposed development is also cognisant of the site topography which slopes down toward the south in the direction of the Liffey. All areas of open space (public and communal) are well designed and sheltered from the road, allowing for safe enjoyment by users. The development will allow for activity on the site, with increased pedestrian movements. It will give a more focussed aspect to the area, creating a sense of place and giving a heightened sense of security and safety to existing and prospective residents.

All units have been designed to meet the highest level of energy efficiency. The units will be constructed to a high degree of air tightness in compliance with building Regulations Part L. The development will use energy efficient technologies to reduce its reliance on fuel and electricity demand. 73 of the 167 apartments are single aspect. The proposed development underwent a daylight and sunlight assessment to ensure that appropriate levels of daylight and sunlight are provided to the units. It is reiterated that 45 of the units have been designed to universal design standards.

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

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

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

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

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

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

The subject site is located within an urban neighbourhood with access to existing and planned high capacity public transport. The application site's context aligns with the criteria of strategic and sustainable development locations defined under the category of City – Urban Neighbourhoods, where density shall generally range between 50-250 dph.

#### **Policy and Objective 3.1**

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

For the purpose of calculating the net density on site excludes the public footpath on Grangeegorman Lower and the northerly part of Stanley Street which is deducted, which results in a net area of c.1.12 ha. This

generates a net density of 148.7 uph. The proposed density accords with the recommended 100-300 dph applied in the centres of Dublin.

Section 5 of the Apartment Guidelines 2023 sets out locations suitable for increased densities with 5.7 focussing on development on brownfield sites. It recognises that where sites are located close to existing or future transport corridors, the opportunity for their re-development to higher densities should be promoted.

The proposed density is 148.7 uph. The density is also aligned with the recommended density in the Dublin City Development Plan 2022-2028.

**Policy and Objective 4.1**

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

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

Section 4.4 outlines general aims of sustainable residential development, including the need to prioritise walking, cycling and public transport over the use of cars, and to provide residents with quality of life in terms of amenity, safety and convenience.

**Policy and Objective 4.2**

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

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

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

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

No.	Topic	Response
<b>1</b>	<b>Sustainable and Efficient Movement</b>	
<b>(i)</b>	permeable and legible network of streets and spaces within the site	Under its most recent use, the subject site was effectively a back lands site, with a single point of access to the south, and with access granted by permission only. The subject development aims to have much improved permeability, with a new vehicular and pedestrian street linking Stanley Street and Grangegorman Lower. It is intended that vehicular access will only enter the site at the east, and exit at Stanley Street to the south. Pedestrian permeability will be unrestricted.

No.	Topic	Response
		<p>In addition to nearby access to the Red line Luas network at Smithfield, the site has good public transport links with a number of adjacent Dublin Bus routes, which are overviewed in section 2 of this report. There is also a well developed cycleway infrastructure, with close access to the Dublin Bikes cycle share scheme, amongst others.</p>
<b>(ii)</b>	connections with and between established communities, services and other uses	<p>This city centre site is located adjacent to the urban village and associated amenities of Stoneybatter, is within a short walk of similar and complimentary amenities at Smithfield, and benefits from close access to schools and education, including the TU Dublin Grangegorman campus immediately north. Its development will fulfil the DCC development plan strategy to consolidate and facilitate the development of the central area and is ideally located to achieve the envisaged 15 minute city policy objective of the Development Plan.</p>
<b>(iii)</b>	streets designed in accordance with DMURS	<p>In line with National Policy, the development objective for the proposed site is to provide for higher-density infill development, in an urban location with good transport links. This helps to fulfil one of the primary objectives of DMURs, which is to encourage more sustainable travel, with pedestrians at the top of the user hierarchy, then cyclists, public transport and finally, private vehicles.</p> <p>The site is served by a new access street, which aligns with Stanley Street to the south, continues northwards for approx. 2/3 of the site, and then heads east to connect with Grangegorman Lower. This street serves to also provide for primary pedestrian and cycle access to much of the development, in addition to providing for modest car-parking, motorcycle parking and layby provision for delivery vehicles.</p> <p>The proposed L-shaped street is modest in length, and a combination of both horizontal displacement and minimal carriageway widths are utilised to control traffic speed. Primary access to all apartments is directly off the footpath, either directly to the stairwell of each block, or to the front curtilage of those apartments that feature own door access. Otherwise, to provide resident access to communal amenities, footways lead from the public pavement and into the communal open space behind the building line.</p> <p>Proposed new streets and pavements within the site have been designed to be accessible, with maximum falls &lt;1in20 as a gently sloped approach, negating the requirement for steps and ramps.</p>
<b>(iv)</b>	quantum of parking been minimised	<p>As per the DCCDP, the site is located within parking zone 1 due to its city centre location. Based on the objective to deliver housing and a childcare facility at this site, the maximum car parking standards are 0.5 spaces/dwelling, and 1 per 100m<sup>2</sup> of creche GFA. However, for the proposed development, with an analysis of particular need and on account of close proximity to public transport, a car parking ratio of 0.11 is proposed. Further clarification here is presented in the Mobility Management Plan that accompanies this planning application.</p> <p>Parking in this scheme is provided in a modest surface level carpark along the new access street. The parking area benefits from a high degree of passive</p>

No.	Topic	Response
		<p>surveillance, both from the adjacent road and from the proposed buildings. The proposed street features soft landscaping and tree planting, all of which serve to minimise the visual impact of any car parking. Bicycle stores are in the form of secure indoor rooms with good lighting and secure access, entered either from the secure communal open spaces to the rear of the buildings, or by means of a well overlooked, access controlled door on the building perimeter. Visitor bicycle parking in the public realm is well overlooked from apartments above.</p>
<b>2</b>	<b>Mix of Land Uses (Vibrant Centres and Communities)</b>	
<b>(i)</b>	<p>mix and intensity of land uses appropriate to the site</p>	<p>The site is zoned Z5: City Centre, with the land-use zoning objective 'to consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity.'</p> <p>The subject proposal, which is housing led, with complimentary childcare, community, arts and cultural facilities is therefore deemed to be of an appropriate mix and intensity as it meets the requirements of the DCCDP.</p>
<b>(ii)</b>	<p>diverse and varied range of housing types</p>	<p>The proposed development is for general needs housing. The proposed brief has been derived from a Housing Needs Demand Assessment of the area. The resultant mix of 1, 2 and 3 bed apartments provide for those needs.</p> <p>Furthermore, in compliance with DCCDP, in excess of 25% of the apartments have been designed in accordance with Universal Design Principles.</p> <p>The Community, Arts and Cultural space included in the scheme are intended to reflect current most viable uses, but these uses will be able to evolve and change over time.</p>
<b>(iii)</b>	<p>support the regeneration and revitalisation of an existing centre or neighbourhood</p>	<p>The subject development is regenerative for the wider community, in that it revitalises a current underutilised site, and serves to provide housing for which there is a proven need through Housing Needs Demand Assessment. The proposed development will ultimately provide homes for families and individuals who have a housing need, and have expressed an interest to live in the community.</p> <p>In addition to the proposed housing, a Community, Arts and Cultural facility will also be delivered as part of the development. Whilst the final use of this space is currently unknown, it is intended that its purpose will reflect the needs of the wider community.</p> <p>Furthermore, a childcare facility, and a new high quality public open space is to be delivered, for the benefit of the wider community.</p>
<b>(iv)</b>	<p>enhancement of the public realm</p>	<p>The main public realm contribution will be the provision of a new public open space. This is located at the south western site boundary, fronted by proposed apartment buildings on 2 sides, and overlooked by an existing apartment to the south on a third side. This allows the POS to be accessible to both the proposed new residents and the wider existing community. Its arrangement also allows good passive surveillance from both the existing and proposed dwellings and apartments, and also from passing traffic along the proposed vehicular and pedestrian access street to the centre of the site.</p> <p>The POS has been designed to provide for fire tender access to the frontage</p>

No.	Topic	Response
		<p>of Blocks A&amp;B. The proposed development will bring some improvement to the streetscape along Grangegorman Lower in the form of new railings, tree planting, and improvements to pavements. The development also allows for the provision of greater permeability of the site, by means of the new central access street, connecting Stanley Street with Grangegorman Lower.</p>
<b>3</b>	<b>Green and Blue Infrastructure (Open Space, Landscape and Heritage)</b>	
<b>(i)</b>	<p>positively responded to natural features &amp; landscape character</p>	<p>The site is a brownfield site, currently covered in concrete hardstanding. Proposals for landscaping to the new access street, POS and COS spaces, in addition to other ecological considerations developed by the wider design team, with particular input from our consultant arborist, ecologist and landscape architect, will therefore serve to improve landscaping and biodiversity. The subject development proposes a net biodiversity gain.</p> <p>While there are no protected structures within the subject site, it is proposed to retain 2 façades of the existing 1870s L-shaped building to the south-eastern corner of the site, facing onto Grangegorman Lower and towards the south. This will ensure that strong links to the former industrial use of the site are retained. In addition, a memory of the former 'Waste Destructor' use of the site is to be retained within the hard landscaping, with the alignment of former tram lines mimicked within the proposed paving.</p> <p>The former maltings building at 32 Brunswick Street North, Dublin 7 (RPS Ref 994) shares the southern side boundary. The subject development presents a suitable respective architectural form at this location, with significant setback between the existing protected structure and the subject development.</p> <p>Otherwise, the National Inventory of Architectural Heritage notes features of Stanley Street being of special interest. This is a cobbled street, comprising granite setts laid around cast-iron Dublin Corporation tram tracks, laid c.1900. These tram lines formed part of Dublin Corporations waste disposal system for the city in the opening decades of the twentieth century. The subject proposal serves to retain this feature.</p>
<b>(ii)</b>	<p>a complementary and interconnected range of open spaces, corridors and planted/landscaped areas</p>	<p>The development will include a public open space facing Stanley St., which serves as a threshold to the scheme, providing opportunities for strategically located seating to take advantage of its exposure and offering a generous play area.</p> <p>The scheme is configured along a main boulevard from Stanley Street to Grangegorman Lower, ensuring ease of circulation and creating a visually attractive environment with mature trees lining the boulevard. Furthermore, ample amenity opportunities are found within the two courtyards forming part of the scheme.</p> <p>Further details of all landscaping proposals can be found within the Landscape drawings and Landscape Report.</p>
<b>(iii)</b>	<p>public open spaces universally accessible and designed to cater for a range of active</p>	<p>The public open space is at the threshold of approach to the site from Stanley Street, and therefore is Part M accessible. Likewise, both communal open spaces have been designed to provide accessibility for all. The public spaces are designed as passive recreational space, serving both the proposed residents and the wider community.</p>

No.	Topic	Response
	and passive recreational uses	
(iv)	integrated nature-based solutions for the management of urban drainage	The design features extensive active SUDs measures, including tree pits, green and blue roofs, and permeable paving. Interception storage is proposed through a combination of the blue roofs and the permeable paving solution, and a detention basin, with minimal provision by means of attenuation tanks.
<b>4</b>	<b>Responsive Built Form</b>	
(i)	coherent and legible urban structure in terms of block layouts and building heights	<p>As this site is an urban infill development, appropriate height scale and massing can only be determined with particular regard to existing context. The subject proposal also aims to have sufficient variety in building height as an important component in helping to achieve a sense of place and create an attractive built environment, all whilst protecting existing residential amenity. When sufficient variety in building height and form is not achieved, in certain cases streets can become placeless and difficult to orientate. The minimum density requirement of 100uph (determined by zoning requirements) must also be achieved.</p> <p>To the east of the site fronting Grangegorman Lower is a recently constructed student housing development (Ardcairn House), a development of 5-6 stories in total, with ground floor retail facing the street. It is proposed to set the subject building back from the street edge, and lower the height relative to the adjacent building, to provide a reasonable street width/ building height proportion of c.09-1.0.</p> <p>An existing terrace of 10 no. late 20th century 2-storey dwellings abut the subject site boundary at Stanhope Green to the north, the rear facade of which is c. 8m from the subject site boundary. In order to protect the residential amenity of adjacent residents, and to serve as a transition to the proposed 4-5 storey apartment building at Blocks E&amp;F, a 3-storey duplex arrangement is proposed to the south of the northern boundary.</p> <p>On approach along the new access street from the east, the proposed Block B&amp;C building frames a long vista, with an opportunity for increased building height, to benefit visual interest and wayfinding. However, as this building is also in reasonably close proximity to 2-storey dwellings at Stanhope Green to the north, it is proposed to step the building form within close proximity of the boundary, to protect adjacent residential amenity.</p> <p>Generally to building corners, modest changes in building plane, parapet height, and finish materials all assist in bringing clarity to the building massing.</p>
(ii)	buildings address streets and spaces	The proposed building frontage to new and existing streets follows best practice urban design principles. At ground floor level, the public side of the building is presented to the street, with entrance doors to each stair core, and own door approaches with private front curtilages to ground floor



No.	Topic	Response
		<p>apartments where relevant. Any ground floor windows are set back from the street, and include either generous privacy strips or private entrance curtilages.</p> <p>The rear of Blocks A-C &amp; D-G overlook their respective communal open space. All publicly accessible spaces, including perimeter streets, and the public open space are overlooked by multiple apartment windows, patio doors and balconies, creating multiple opportunities for passive surveillance. The public open space is also overlooked by existing housing at Brunswick Court</p> <p>The proposed public open space is not overshadowed by either existing or proposed buildings. Therefore, all open space enjoys direct access to sunlight to ensure that it is bright and attractive during the day, maximising the potential for it to be well used.</p>
<b>(iii)</b>	<p>layout, scale and design features of new development respond to prevailing development patterns (where relevant)</p>	<p>The respectful massing and height of proposals along Grangegorman Lower serves to reduce the impact of overlooking and overshadowing of the opposing facade to the Ardcairn House student accommodation.</p> <p>To the south, the building form at Block G on Grangegorman Lower is interrupted, where a vehicular entrance serving the adjacent development helps to disconnect it from the subject development. In a similar way, at the south of Block D, a pedestrian entrance to the communal open space serves to disconnect the subject development from the Maltings Building immediately adjacent. This enables this facade to feature balconies and windows with a southerly aspect, which serves to animate the facade, without impacting the privacy of the adjacent property to the south. In both cases, the change in relative scale of adjacent buildings is modest.</p> <p>The west elevation of Block A is located in close proximity to the western site boundary, and to the Stoneybatter Place student accommodation opposite. To address potential overlooking concerns, windows to residential units directly opposing the adjacent student housing building will feature opaque glazing. In addition, the building height and massing of the subject development at this location has been reduced relative to adjacent proposals to ensure that there is no negative sunlight or daylight impact.</p> <p>The tallest element of the proposed development is proposed at Blocks B&amp;C, the northern facade of which is in reasonably close proximity to 2-storey dwellings at Stanhope Green to the north. To address potential overlooking concerns, windows to residential units directly opposing the adjacent boundary will also feature opaque glazing. In addition, the proposal to step the building form within close proximity of the boundary serves to protect adjacent residential amenity to adjacent dwellings at Stanhope Green.</p>
<b>(iv)</b>	<p>coherent architectural and urban design strategy</p>	<p>A coherent architectural design strategy has been delivered, which will bring benefits to the social sustainability of the local area.</p> <p>Architecturally, the development will present an appropriate and distinctive urban form to Grangegorman Lower, and on the approach from Stanley Street. It will offer an improvement to the street enclosure, passive</p>

No.	Topic	Response
		<p>surveillance of and urban form to Grangegorman Lower, whilst maintaining the daylight and sunlight amenity of existing properties.</p> <p>A common design language is threaded through each of the elements of the proposed development, but separately each element has sufficient variety in height, finishes and articulation to assist in forming a sense of place, ensure local distinctiveness, and to aid orientation.</p>

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

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	<p><b>Separation Distances</b></p> <p>When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p>	<p>The proposed development does not give rise to any separation distance between opposing windows of less than 16m.</p>
<b>SPPR 3</b>	<p><b>Minimum Private Open Space Standards for Houses</b></p> <p>Proposals for new houses meet the following minimum private open space standards: 1 bed house 20 sq.m; 2 bed house 30 sq.m; 3 bed house 40 sq.m; 4 bed + house 50 sq.m</p>	<p>Apartment units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).</p>
<b>SPPR 3</b>	<p><b>Car Parking</b></p> <p>In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified</p>	<p>A total of 19 no. car parking spaces have been proposed. This entails a ratio of 0.11 spaces per unit. Owing to the site's location and proximity to existing and proposed high-quality transport, the proposed car parking provision is considered appropriate.</p>

SPPR No.	Summary	Development Compliance
	to the satisfaction of the planning authority, shall be 1 no. space per dwelling	
<b>SPPR 4</b>	<p><b>Cycle Parking and Storage</b></p> <p>Safe and secure cycle storage facilities to meet the needs of residents and visitors. A general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided.</p>	A total of 371 cycle parking spaces are provided (270 long stay and 101 no. short stay). This is accordance with the Dublin City Development Plan standards and is appropriate to meet the needs of residents and visitors for the profile of this future resident community, creche and community, arts and cultural use.

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

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

*Different minimum requirements (within the 10-15% range) may be set for different areas..... in some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity.*

The proposed development provides for 10% Public Open Space provision (0.113 ha) as well as 1350 sqm. Communal Open Space and is therefore in accordance with the Guidelines’ Policy Objective.

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

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

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.

Vehicular site access is proposed from Grangegorman Lower along the new internal street in a one-way loop, with site egress at Stanley Street. This proposed street also provide cyclists and pedestrian access to the development, in addition to providing EAV access.

A Stage 1 Quality Audit has been prepared in respect of the proposed development which incorporates a DMURS Street Design Audit and Audits of Accessibility, Cycling, Walking and Road Safety. The Audit has made key suggestions in relation to DMURS compliance and these suggestions have been incorporated into the design proposal for the Part 8 site. The proposed development has been designed in accordance with DMURS,

please refer to the accompanying Transport and Mobility Management Plan and road drawing prepared by Malone O'Regan.

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

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

SPPR No.	Summary	Development Compliance
<b>SPPR 1</b>	<p>Mix of units to include:</p> <ul style="list-style-type: none"> <li>- Up to 50% one-bed or studio type units;</li> <li>- No more than 20-25% of the total proposed development as studios;</li> <li>- No minimum requirements for 3-bed.</li> </ul> <p>CDP may specify a mix for apartments subject to a Housing Need and Demand Assessment.</p>	<p>The proposed development includes 167 units, of which 92 are 1-bed (55%), 57 are 2-bed (34%) and 18 are 3-bed (11%).</p> <p>The site forms part of the 'Dublin 1' area which is subject to one of the sub-City HNDA in the Dublin City Development Plan 2022-2028. The proposed mix is justified with regard to housing need and section 15.9 of the Development Plan standards. This part 8 proposal was formulated jointly with the DCC Housing &amp; Community Services Department. The department has identified the need for the quantum proposed. On this basis, the development complies.</p>
<b>SPPR 3</b>	<p>Minimum Apartment Floor Areas</p> <ul style="list-style-type: none"> <li>• Studio apartment (1 person) - 37 sq.m</li> <li>• 1-bedroom apartment (2 persons) - 45 sq.m</li> <li>• 2-bedroom apartment (3 persons) 63 sq.m</li> <li>• 2-bedroom apartment (4 persons) 73 sq.m</li> <li>• 3-bedroom apartment (5 persons) 90 sq.m</li> </ul> <p>The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard, by a minimum of 10%</p>	<p>Please refer to the Housing Quality Assessment (HQA) and which demonstrates compliance.</p> <p>All units meet the floor area requirement as set out in Appendix 1 of the Apartment Guidelines.</p> <p>HQA sets out in table format the floor area of each apartment and the compliance with the Guideline</p>
<b>SPPR 4</b>	<p>Dual Aspect</p> <p>(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.</p>	<p>94 apartment and duplexes are dual aspect. This equates to 56% of units.</p>

SPPR No.	Summary	Development Compliance
	(ii) (ii) and (iii) do not apply.	
<b>SPPR 5</b>	Floor to ceiling heights Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.	The proposed floor to ceiling height are consistent with SPPR5 of the Apartment Guidelines. The proposed floor to ceiling height is in accordance with this specific policy.
<b>SPPR 6</b>	Apartments per core A maximum of 12 apartments per floor per core may be provided in apartment schemes.	The proposed development complies with SPPR6.

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

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

***Minimum Quantitative Standards***

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

***Private Open Space***

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

***Communal Open Space***

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

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

Unit types	Sqm required	No. of Units	Total required (Sqm)
<b>1-bed</b>	5	92	460
<b>2-bed (3 persons)</b>	6	2	12
<b>3-bed (4 persons)</b>	7	55	385
<b>3-bed</b>	9	18	162
<b>Total</b>		167	1019

The proposal includes c. 1350 sqm of communal open space. The proposed communal open space is allocated within the internal courtyards of Blocks A-C and Block D-G. The proposed development therefore exceeds the standard requirement.

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

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

The HQA demonstrates compliance with section 3.8 of the Apartment Guidelines as the majority of all apartments exceed the minimum floor area standard for any combination of the unit types by a minimum of 10%. In this case, 110 units, which equates to 66%, therefore exceeding this requirement.

### **Play areas**

The Apartment Guidelines 2023 indicate minimum requirements for play areas of schemes of a certain sizes. The proposed development includes 92 no. 1- bed units, 57 no. 2-bed and 18 no. 3-bed. It therefore gives rise to the need to provide 85-100 sqm for a small play area but does not give rise to the need to provide a play area for older children as the number of 2+ bed units totals 75. The design utilizes the detention basin creatively, incorporating stepping stones to encourage exploration and physical activity among younger users. A dedicated 100 sqm play area is provided within the public open space provision to the south west corner of the site. The play area includes equipment for toddlers and children up to age six with seating also provided at the play area and adjacent areas to ensure adequate supervision.

### **Cycle Provision**

Design Standards for New Apartments – Guidelines for Planning Authorities provide the following: Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. Given the proposed housing mix, the guidelines would therefore require the provision of 260 long-stay spaces to serve the residential portion of the development.

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

In relation to short stay cycle parking, the guidelines would give rise to a requirement of 84 spaces for the residential component of the development. The proposed development includes 101 spaces and therefore meets the requirement.

It is important to note here that the cycle parking provision in the Apartment Guidelines 2023 are not SPPRs where they are mandatory. Deviation from the standard is at the discretion of the Planning Authority. In this case, the proposed cycle parking is in accordance with the CDP given the proposed creche and community, arts and cultural spaces also proposed as part of the application.

### 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 proposed for development under this Part 8 application would qualify as one such central/and or accessible urban location, and therefore avails of lower parking standards. The site is in the City Centre and is in close proximity to numerous bus stops, approximately 100m, 1-minute walking catchment of the site, with a number bus services that are as frequent as every 15 minutes. The sites is also within an 8-minute walk to the Luas Red Line at Smithfield. The nearest train station is Heuston Station approximately 1.7km (24-minute walk or 8-minute cycle journey) from the proposed development.

On-site car parking is considered to be an inefficient use of space, particularly at a constrained location in a highly developed urban area such as the development site.. As part of the Traffic Mobility Management Plan, a number of mobility management measures have been proposed that can be implemented once the site is occupied.

It is proposed to provide 19no. spaces in total which equates to 0.11 spaces per unit. The proposed parking provision is considered appropriate for reasons outlined above and contained therein of the accompanying Traffic Mobility Management Plan.

### Content of Planning Applications

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

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

### Daylight to Adjacent Properties

The majority of the window the neighbouring residential properties retain a VSC level greater than 27% or if less than 27% VSC then they are not reduced below 80% of their existing value. There are a small number of windows that have a reduction below 27% VSC but these windows are to recently constructed Student Accommodation buildings that were built close to or on the boundary of their site, with no allowance for neighbouring developments. The guidelines sets out alternative target VSC levels for these conditions and all of these windows achieve the alternative target VSC levels. Any reduction in available daylight is in-line with emerging trends in the area and any impact will be negligible.

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

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

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

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

### ***Sunlight within the Proposed Development***

This scheme is well designed for sunlight, with 77.2% of units meeting the minimum recommended 1.5 direct sunlight hours. This is in line with the BRE guidelines example for an apartment layout where 4 in 5 achieves the target sunlight hours. All public and communal amenity areas meet and exceed the recommendations of the BRE guidelines, achieving sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st March. The BRE guidelines acknowledges that there are many factors and design constraints that influence the layout of the buildings and often it is not possible for all private amenity spaces to achieve the recommend values for sunlight. Due to their orientation, some of the duplex units will not reach the recommended target values for sunlight, but this is within the context of an inner city urban environment.

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

## **7.2.6 Urban Development and Building Heights – Guidelines for Planning Authorities (2018)**

The *Urban Development and Building Height Guidelines for Planning Authorities 2018* (Building Height Guidelines 2018) were published to support the achievement of some of the policies and objectives of the NPF 2040, to secure compact and sustainable urban growth, particularly on brownfield and infill sites and that optimal capacity of sites should be sought. This may involve increased height where it can be demonstrated that it complies with certain parameters. . The Dublin City Development Plan 2022-2028 reflects the content of these guidelines.

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

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

The Dublin City Development Plan 2022-2028 applies to the subject site. The proposed development provides for a range of height from 3 to 6 storey, which is modest having considered the surrounding area and within the permissible envelopes of the Dublin City Development Plan. It also allows for higher density.



## 7.3 Regional Policy

### 7.3.1 Regional and Spatial Economic Strategy (RSES) for the Eastern and Midlands Region 2019-2031

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

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

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

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

## 7.4 Local Policy

### 7.4.1 Dublin City Development Plan 2022-2028

#### *Strategic Objectives*

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

The Core Strategy and Settlement Hierarchy of the Dublin City Development Plan outlined in Table 2-8 of the Development Plan presents the spatial structure and proposed residential yield in the various areas of the City. The site would be considered as infill/ smaller scale brownfield and opportunity sites and fall within the 'City Centre within M50' category under Urban Consolidation and would therefore contribute to urban consolidation with a planned residential yield of 12,900 units and a population of 23,220 persons.

Under CSO7 *'Promote Delivery of Residential Development and Compact Growth'*, the Council seeks *'To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas.'* The proposed development is fully aligned with CSO7

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

**Zoning**

The Dublin City Development Plan (CDP) 2022-2028 zones the lands Z5 City Centre which objective is ‘to consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity’. Under Z5, the CDP seeks to provide a dynamic mix of uses and to create a sense of community. The aim is to sustain the vitality of the inner city both by day and by night. It also envisages that there can be a vertical mix of uses, and horizontally along the street frontage. Under Z5 zoning, mono uses are not allowed.

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

The proposed development includes at ground floor a creche and community, arts and cultural space. The upper floors will be residential units. The development complies with the zoning and all uses proposed are permissible. The applicable zoning in the context of the site is illustrated below.

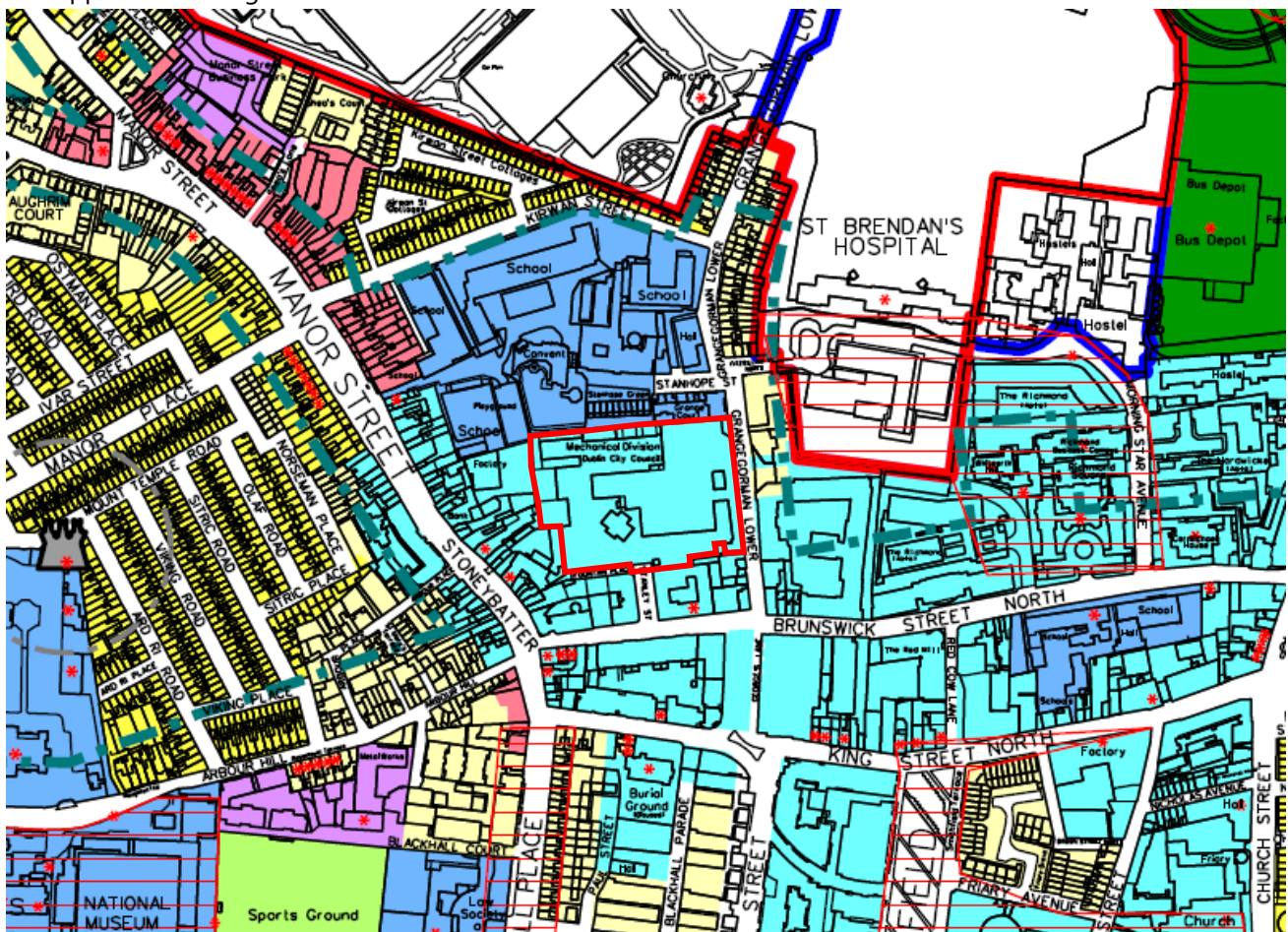


Figure 10: Extract from the DCC CDP Land Use Zoning Map (Source: DCC)

### Quality Housing and Sustainable Neighbourhoods

Under QHSN3, the Council seeks to implement its Housing Strategy and Housing Need and Demand Assessment (HNDA) and to encourage the provision of a variety of housing typologies and tenures. It is noted that in the North Inner City proposals in excess of 15 or more units should include a minimum of 15% three or more bedroom units and a maximum of 25%-30% one bedroom/ studio units. Having regard to the exemptions listed in Table 37 of Appendix 1 of the Development Plan, the subject application is a Council Part 8 residential scheme and therefore it may propose a different mix having regard to the specific needs of the Housing & Community Services Department. The proposed application has been designed in consultation with the Housing & Community Services Department of Dublin City Council. In this regard, the proposed housing mix has been arranged to meet the requirement of the Sub-City Dublin 1 HNDA. The proposed unit mix therefore accords with the provisions of the Development Plan.

The part 8 application also supports the achievement of QHSN9 on active land management. The lands were identified as an underutilised site which could contribute to the consolidation and general improvement of the area. With a proposed density of 148.7 uph, based off a site of 1.12 ha, the proposal aligns with QHSN10 ('Urban Density') as the part 8 site is an infill site and is underutilised. Its most recent use as the Fire Brigade Maintenance Depot and DCC Mechanical Division is at odds with the surrounding uses. The development also provides the opportunities to cater for homes to support the creation of communities and to sustain constant all year-round activity in the area. The proposed development will be of high standards of urban design and architecture.

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

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

Dublin City Council Development Plan (2022-2028) advises that a minimum of 50% of apartments are to exceed minimum area standards by 10%, and that in addition, 50% of apartments that are in excess of minimum size requirements are to be designed to be UD compliant. The UD standards noted are the requirements of the 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design (National Disability Authority).

Based on the above requirement, the minimum provision of UD apartments would be 25%. The proposed development has 27% of apartments designed to UD standards. For the proposed development, the design seeks to allow for delivery by any or all Modern Methods of Construction (MMC), including modular volumetric construction. In order to allow for varied MMC approaches, it is proposed that 100% of 1B2P apartments will be in excess of minimum size standards, and 65% of apartments in total.

The delivery of 65% of apartments in excess of minimum area standards is a constructability consideration, and is not as a consequence of compliance with the DCCDP. Therefore, in order to comply with the DCCDP UD

requirement, it is proposed that a proportion of all apartments (in this case, between 50% and 54%) will be designated as the '+10% area' apartments for the subject development, so as to ensure that at least 50% of apartments that are in excess of minimum size requirements are to be designed to be UD compliant.

The proposed development includes a community, cultural and arts space (552 sqm) which is split across Blocks B, E, F and G. The creche is proposed to be located in Block C. The provision of such space is aligned with policies QHSN47 High Quality Neighbourhood and Community Facilities and QHSN50 Inclusive Social and Community Infrastructure. A Social Infrastructure Audit accompanies this part 8 submission in accordance with QHSN48 Community and Social Audit.

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

Under chapter 8 of the CDP, Policy SMT1 'Modal Shift and Compact Growth' and objective SMT01 'Transition to More Sustainable Travel Modes', the Council promote a shift from the use of private car towards an increased use of more sustainable forms of transport and more active mobility. The proposed development includes for 19 no. car parking space or a ratio of 0.11. It makes generous allocations for cycle parking, including sufficient space for cargo bikes and it is located near a range of buses and within 500m of the Smithfield Luas Stop. The proposed development supports both the policy and the objective.

In accordance with policy SMT4 'Integration of Public Transport Services and Development', the proposed development has a density of 148.7 uph, provides for connectivity between uses, and includes facilities which can be used by the broader community.

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

High quality public realm proposals are catered for as part of the development in accordance with SMT9. The development will particularly help improve the outlook on Grangegorman Lower with a strong and active building frontage and a new and widened footpath. Currently, the footpath is in a poor state and narrow. All areas of public and communal open space are sheltered from the road and well overlooked by residential units. Please refer to Landscape Plan prepared by Mitchell + Associates.

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

SMT27 'Car Parking in Residential and Mixed Use Developments' promotes sustainable car parking with a view to promote city living and reduced car parking standards. Car parking standards are set out in Appendix 5, Section 4, Table 2 of the Draft Dublin City Development Plan 2022-2028. The site is located within parking zone 1 due to its location within the Canal Cordon and North Circular Road, and its proximity to active travel infrastructure and opportunities where major public transport corridors intersect. In this regard, the proposed development includes minimal parking due to its location in the city centre and its proximity to an array of

services and amenities that can serve the population generated from the proposed development. The proposed development includes a 19 no. spaces.

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

In terms of bicycle parking, 270 long stay spaces are provided and 101 short stay spaces are provided. This equates to an overall quantum of 371 no. spaces. This includes dedicated long term and short term bicycle parking for the creche and community, arts and cultural uses at the site. Bicycle stores are in the form of secure indoor rooms within the ground floor of the building. Visitor bicycle parking in the public realm is well overlooked from apartments units.

During construction, access to Stanley Street will be provided initially in the short term until Building 01 is demolished. Following which, main access to the site will be via Grangegorman lower. It is noted that large vehicles currently access the Depot via Stanley Street hence the road surface is used to receiving loading of same and should be capable of supporting an infrequent number of heavy vehicles in the short term. During operation, vehicular site access is proposed from Grangegorman Lower along the new internal street in a one-way loop, with site egress at Stanley Street.

### **Green Infrastructure and Recreation**

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

GIO1 ('Green Roof Guidance Document') should also be noted. The development response is provided under the development management section of this report. GI28 'New Residential Development' requires that, in new developments, public open space is provided which is sufficient in amenity, quantity and distribution. The proposed development includes high quality public and communal open space and therefore meets the requirement.

The CDP also includes policies on tree planting and retention. In particular, it requires appropriate and long-term tree planting in the planning of new developments (GI40) and the protection of existing trees (GI41). There are only three existing trees onsite. These are of poor quality and will not be maintained as part of the development. The development does apply appropriate distances from the root protection zones of the mature trees which are located on the other side of the boundary on Stanhope Street. In addition, there will be ample tree planting. The existing ecological value of the site is poor owing to its existing use. As a result of the development, its ecological quality will improve, and the site will make positive contribution the City's green infrastructure network.

The development includes children's play facilities as required under GI51 and GI52. The proposed development comprises a 100 sqm play area, which provides play equipment for toddlers and children up to the age of six. Having regard to the sites former use as a Scavenging Depot with part of the original tram tracks still in situ

along Stanley Street, the selected play equipment of a steam engine and railway carriage provide for historic references to be integrated within the landscaping strategy for the site.

**Built Heritage and Archaeology**

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

**Table 4: Chapter 11 Built Heritage and Archaeology Policies**

Policy	Response
<p>BHA2(a) Ensure that any development proposals to protected structures, their curtilage and setting shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities (2011) published by the Department of Culture, Heritage and the Gaeltacht.</p>	<p>None of the existing structures or site features were recorded by the National Inventory of Architectural History, and none are specifically protected by inclusion on the Dublin Record of Protected Structures. There are a number of structures of RPS status proximate to the application site, including 32 Brunswick Street North, Dublin 7 (RPS. 994) which is adjacent to the site. The former Malting House is a Protected Structure (RPS No. 994) stands on the junction of Stanley Street and Brunswick Street North, in the north inner city of Dublin. Under the NIAH, the structure is referred to as Texacloth Limited with an original use of Maltings. As part of the Preliminary Heritage Impact Assessment Report, the potential impact to the Maltings Building has been assessed by a Grade 1 Conservation Architect, Tom McGimsey.</p> <p>In summary, the report concludes that the proposed development has been designed to prevent any negative impacts on the setting of the former Malting House, or its physical integrity. There will be no direct physical impacts because of the creation of an open space within the proposed development along the junction with the Malting House. This will also allow for greatly improved visibility of the north elevation of the Malting House when viewed from several different areas within the proposed development. It is considered that there will be a significant conservation gain to that structure by making it more visible to be enjoyed to residents of the development as well as the general public</p>
<p>BHA2(b) Protect structures included on the RPS from any works that would negatively impact their special character and appearance.</p>	<p>The application site does not include any buildings recorded on the DCC record of protected structure. As noted in the above response, any potential impact to the abutting protected structure has been assessed as part of the Conservation Statement and has been detailed above.</p>

Policy	Response
<p>BHA2(c) Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation.</p>	<p>A Grade 1 Conservation Architect, Tom McGimsey of Mesh Architects has been engaged by Dublin City Council and the NDFA to advise on conservation matters pertaining to the proposed development.</p>
<p>BHA2(d) Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.</p>	<p>The proposed development does not include any modification, alteration or extension to a structure of RPS status. The proposed development has endeavoured to deliver a scheme of appropriate scale, height, density, layout and materials whilst also ensuring the scheme complies with the provisions of the Dublin City Development Plan.</p>
<p>BHA4 Ministerial Recommendations:  To have regard to the National Inventory of Architectural Heritage (NIAH) rating of a structure and any associated Ministerial Recommendation in the assessment of planning applications.</p>	<p>The site is proximate to a number of NIAH rated structures, including the Stanley Street Tram Tracks and Stone Paving. Stanley Street previously provided access to the Scavenging Yard, including a linkage to the tram system in Dublin. While only some fragments of the Scavenging Depot remain, Stanley Street has retained both its historic paving stones and preserved a section of tram tracks that run the full length of the street, Stanley Street is not listed in the Dublin Record of Protected Structure. However, it is recorded on the NIAH (Ref no. 50070207). The NIAH records the street of Regional significance with social and technical areas of special interest.</p> <p>Stanley Street is not on the Dublin Record of Protected Structures, however it was included in the Dublin Development Plan 2022-2028 Appendix 6, Section 1.1, (Stone Setts and Associated Features, to be protected, conserved or reintroduced), which lists a schedule of streets where historic and traditionally laid stone setts are to be protected, conserved and reintroduced, together with any associated gutter row(s) of setts; gutter flags or flat diorite gutters, diorite strip between central and side paving, and traditional gullies, gratings and covers.</p> <p>No modifications are required to Stanley Street to accommodate the proposed development, other than some realignment to the public footpath and tidying of areas of previously re-laid paving stones, both at the north end of the street.</p> <p>Access to the site is currently via Stanley Street and Grangegorman Lower, and vehicular access will continue via these streets as part of the proposed development. In particular, it is acknowledged that Stanley Street will be utilised for site access during the construction stage of the project. However, it is noted that the street currently accommodates travel of fire trucks and therefore it is considered that this route is suitable for construction</p>

Policy	Response
	<p>vehicles Nevertheless, all measures will be employed to ensure that no damage occurs to the historic paving and iron tracks in Stanley Street.</p> <p>It is also acknowledged that the former Maltings Building, 32 Brunswick Street is recorded on the NIAH. The potential impact to this structure has been discussed under BHA2(A).</p>
<p>BHA6 Buildings on Historic Maps:</p> <p>That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report this it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).</p>	<p>A Preliminary Heritage Impact Assessment Report accompanies this application. None of the existing structures or site features were recorded by the National Inventory of Architectural History, and none are specifically protected by inclusion on the Dublin Record of Protected Structures.</p> <p>The various editions of the Ordnance Survey maps show the site of the proposed development, and illustrate how it has changed over the course of nearly two centuries of use. A full review has been conducted as part of the Preliminary Heritage Impact Assessment Report accompanying this application.</p> <p>In terms of the historic maps, Ordnance survey maps dating to the nineteenth century indicate that the northern portion of the site functioned as a Rope Walk, a long open space used in the manufacture of rope. While the southern portion, accessed from Stanley Street, was a ‘Scavenging Depot’ where domestic refuse from the local area would have been stored and dumped. It is noted that the structures were limited within the site boundaries though a number of east-west running boundary walls are depicted separating the depot from the neighbouring rope walk. None of the existing structures or site features were shown on the first edition of the Ordnance Survey, as recorded in 1837, on the subsequent OS map of 1866.</p>
<p>BHA11(a) Rehabilitation and Reuse of Existing Older Buildings:</p> <p>To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape, in preference to their demolition and redevelopment.</p>	<p>It is proposed to demolish most of the existing industrial and office structures that constitute the Depot, and to replace them with a new medium density development of apartments, with new vehicular and pedestrian access directly from Grangegorman Lower, via a new public street. In its current configuration, the depot consists of many structures of varying ages and uses, in varying states of repair. At the centre of the site are large clear span garages, used for the maintenance and repair of the fire service’s extensive range of vehicles, and storage of materials and equipment. As stated by the design team’s Conservation</p>



Policy	Response
	<p>Architect: <i>“Those structures vary in age but most appear to date from the second half of the 20th century, with some modifications and extensions from the early 21st century. None of those structures could be considered to have any particular historical or architectural significance.”</i> Many of the structures on site are unsuitable for reuse and are not considered to positively contribute to the character and appearance of the area.</p> <p>The accompanying Architectural Impact Assessment notes: <i>“Around the perimeter of the site are smaller structures of varying ages and significance. The earliest and most significant of these is the L-shaped building in the south-east corner of the depot site, being a truncated survivor of the 1870s era Scavenging Depot. That building was partially replaced at its northern end by a pleasant two storey block of offices/workshops, dating from the 1950s or 1960s, with a flat roof and steel framed windows. Another pair of 20th century structures are found in the north-west corner of the depot site, dating from an expansion of the Scavenger Depot around 1930, when the 19th century Scavenging Depot was enlarged and upgraded to better serve the needs of a growing city. This pair of structures face each other across a former small courtyard, which has more recently been infilled with a large open ended steel framed cover, in which to park emergency vehicles.</i></p> <p><i>Other built features of some significance are two sections of old walls that currently form part of the western boundary to the overall site. These wall are of varying ages and materials, and have remained in place despite the replacement of the large buildings they were part of, and they new are party structures and must remain in place.”</i></p> <p>During the design process, there has been numerous competing demands in the delivery of a viable scheme at the site. As part of the design, feedback from Tom Gimsey, Grade 1 Conservation Architect of Mesh Architects has been sought and has informed the approach to the development of the site. Ultimately, these factors have fed into the decision making process for the removal of most existing structures on site and partial retention of the early 19th Century L-shaped building (referred to as building no. 03 in the accompanying Preliminary Heritage Impact Assessment Report. The application site is zoned City Centre – Zone Z5</p>

Policy	Response
	<p>with a zoning objective of to consolidate and facilitate the development of the central area, ad to identify, reinforce, strengthen and protect its civic design and dignity. The proposed scheme involved the development of an underutilised infill site in an urban core location and will contribute towards delivering compact and sustainable growth in Dublin City. These matters must be balanced against national, regional and local policy's emphasis on compact growth and more efficiently and sustainably using land within existing settlement.</p> <p>The proposed development has insofar as possible sought to retain the existing character of the site whilst also delivering much needed residential accommodation within the city centre. It is proposed to retain part of the eastern elevation of the last remaining structure to survive from the 19th century Scavenging Depot, and stands at the south-east corner of the proposed development site. It dates from around 1875 and originally extended further north along Grangegorman Lower, and further east along the southern edge of the development site. There are no entrances into the L-shaped structure from Grangegorman Lower, and the windows that serve the internal spaces are quite high above the public footpath. Internally, there are no historic features or materials left intact. The blocks of limestone that form the corner quoins are regarded notable for their technical and aesthetic qualities.</p> <p>The development proposal will retain the south and east elevations of the L-shaped structure, with some modifications to the eastern elevation to accommodate a new entrance into the lower ground floor of the apartment block in the south-east corner of the development. The new entrance will provide access to the main stairwell in the block of apartments, as well as access to two communal spaces. New window openings will also be created through the rubble stone wall to provide light, ventilation and connection to the public street for the communal spaces.</p>
<p>BHA11(b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.</p>	<p>The proposed development has endeavoured to achieve a delicate balance to delivering a high-quality residential scheme and community uses at the site while also preserving the industrial heritage of the site. In this regard, none of the 19th century buildings have survived fully intact, with only the L-shaped structure surviving at least partially intact, although heavily altered and truncated. It is proposed to</p>

Policy	Response
	<p>retain a substantial portion of the L-shaped structure along the east elevation of the site. The rubble stone masonry, and simple window openings on the east and south elevations to the L-shaped structure represent robust and good quality stone masonry, as typified by the Industrial structures of the 19<sup>th</sup> century in Dublin. The retention of the elevations will provide an important element of the built form and the local streetscape.</p> <p>As part of the Conservation strategy on site, during the pre-construction stage an impact assessment and salvage strategy for all proposed removal of historic fabric will be conducted by a suitably qualified person with expertise in architectural conservation. Additionally, A strategy for uncovering any potential concealed historic fabric on the site will be established which will include a record and photographic record of any historical remains identified.</p>
<p>BHA11(c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.</p>	<p>Appropriate materials will be utilised where necessary to carry out any repairs to the retention of the historic fabric. In particular, it is noted that the rubble stone masonry will be repaired and repointed following conservation best practice, and all interventions to accommodate the new development will carefully detailed and executed, to recognise that those are contemporary interventions to the historic architectural fabric.</p>
<p>BHA15(a) Twentieth Century Buildings and Structures:</p> <p>To encourage the appropriate development of exemplar twentieth century buildings and structures to ensure their character is not compromised.</p>	<p>All existing structures on the site have been assessed by a Grade 1 Conservation Architect and are detailed and photographed in the accompanying Preliminary Heritage Impact Assessment Report.</p> <p>Despite its long use as a waste collection depot for the city of Dublin, the subject development site contains very few remaining buildings or other features from that period. The existing structures includes an assortment of buildings and perimeter walls that date from the second half of the 19th century up to the late 20th and early 21st century. None of the structures dated 20<sup>th</sup> century structures are considered to have any particular historical or architectural significance.</p>
<p>BHA15(b) To encourage the retention and reinstatement of internal and external features, that contribute to the character of exemplar twentieth century buildings, such as roofscapes, boundary treatments, fenestration pattern, materials, and other features, fixtures</p>	<p>In terms of the existing boundary walls, the assessment by Mesh Architects is noted: <i>“Other built features of some significance are two sections of old walls that currently form part of the western boundary to the overall site.”</i></p> <p>It is intended to retain this wall, and reduce its height as part of the demolition of the 20th century industrial structures in</p>

Policy	Response
<p>and fittings (including furniture and art work), considered worthy of retention.</p>	<p>the north-west corner of the development site. The historic masonry and early 20th century in-situ concrete must be sensitively repaired during these works, and in consultation with the adjacent property owners.</p>
<p>BHA16 Industrial Heritage:</p> <p>To have regard to the city’s industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans and the assessment of planning applications. To review the DCHIR in accordance with Ministerial Recommendations arising from the National Inventory of Architectural Heritage (NIAH) survey of Dublin City.</p>	<p>It is noted that the site contains two records on the DCIHR. This includes the Scavenging Depot (Ref. no. 18_07_044), which is described as a detached former rendered scavenging depot built c.1820, comprising five storeys. The description of the structure also notes that the site is divided with fire station to the north and Council storage depot to the south with buildings constructed c.2000; main block mostly derelict. The depot was recorded in 2008. Notably, since its inclusion on the DCIHR in 2008 it has neither been added to the Dublin Record of Protected Structures nor the NIAH. However, it is noted that the structure recorded under ref no. 18_07_044 appears to have been demolished from the site. These demolition works were carried at some stage between 2013 and 2018, which is well in advance of the appointment of the design team or the commencement of the design process for the subject site.</p>
<p>BHA24 Reuse and Refurbishment of Historic Buildings:</p> <p>Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high-quality architecture and quality place-making, and by demonstrating best practice in the care and maintenance of historic properties in public ownership.</p>	<p>The development proposal will retain the east elevations of the L-shaped structure, with some modifications to the eastern elevation to accommodate a new entrance into the lower ground floor of the apartment block in the south-east corner of the development. The new entrance will provide access to the main stairwell in the block of apartments, as well as access to two communal spaces. New window openings will also be created through the rubble stone wall to provide light, ventilation and connection to the public street for the communal spaces. The rubble stone masonry will be repaired and repointed following conservation best practice, and all interventions to accommodate the new development will carefully detailed and executed, to recognise that those are contemporary interventions to the historic architectural fabric.</p> <p>The proposed approach to preserving part of the eastern elevation of the I-shaped structure will ensure a balanced approach is employed to the development of the site through the retention of partial historic elements of site while also delivering a scheme of high quality architecture merit that positively contributes to quality sense of place at the site and surrounding area.</p>

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

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

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

In terms of archaeology, an Archaeological Impact Assessment (AIA) has been prepared as part of this application.. In summary, the assessment found that the archaeological evidence for the area has shown that the site is in an area of archaeological potential. Remains associated with Grangegorman House may extend into the study area. This could include structures cobbled surface domestic structures or associated medieval industrial areas.

As a result of this, and in compliance with Dublin City Council (DCC Development Plan policy: Section 11.5.5; BHA26.4 requires archaeological testing of sites over 0.5ha) requirements, archaeological testing is recommended. This testing will be conducted under a license issued by the National Monuments Service (NMS) and should adhere to the framework and Principles for the Protection of the Archaeological Heritage. The testing will aim to identify medieval remains associated with Grangegorman Manor, post medieval deposits and industrial remains at the site. The testing process must be thorough, utilizing appropriate methods to ensure comprehensive examination of potential subsurface remains. If any archaeological remains are identified, further mitigation measures will be required, which could include either avoidance or preservation by record, depending on the significance of the finds and the development's impact.

A detailed method statement must be prepared, outlining the impact of the development on any potential remains and including a strategy for resolving any identified remains. This statement and strategy will be formulated in consultation with the NMS to ensure compliance with regulatory requirements and best practices.

While the current review suggests a moderate potential for historic remains, the recommended archaeological testing is crucial to safeguarding any potential archaeological heritage, ensuring any discovered remains are appropriately managed and preserved in accordance with established archaeological principles and regulations.

The site includes a number of features of industrial heritage listed in the Dublin City Industrial Heritage Record, these include the remain of a tram line and of a 19<sup>th</sup> century scavengers depot. The testing should reveal the extent of these remains and record any above ground remains of industrial heritage. All recommendations are subject to agreement with the Office of the Dublin City Archaeologist and the NMS.

**Culture**

In accordance with CUO25, the proposed development is in excess of 10,000 sqm and therefore, the provision of 5% community, arts and cultural space at the site applies. The total internal space is 11039 sqm. 5% of the net internal space would equate to 552 sqm space required to comply with CUO25. For the purpose of the 5% total, the proposed creche and public open space has been excluded. The proposed development includes 552.45 sqm of community, cultural and arts space located at ground floor level across the site in Block B, E, F and G.

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

**Development Management Standards**

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

**Table 5: Planning Application Documentation**

Reports	Threshold	Application Reference
Architectural Design Report	50 or more residential units	See Architect Design Statement
Housing Quality Assessment	All residential development	See HQA
Landscape Design Report	30 or more residential units	See Landscape Design Report
Planning Report	30 or more residential units	This report
Daylight and Sunlight Assessment	All apartment developments	See Daylight and Sunlight Assessment
Community and Social Audit	50 or more residential units Any development comprising of community or social infrastructure	See Social Infrastructure Audit
Lifecycle Report	All apartment developments	See Building Lifecycle Report
Community Safety Strategy	100 residential units	See Architect Design Statement
Operational Management Statement	30 or more residential units	See Building Lifecycle Report and Operational Waste Management Plan
Traffic and Transport Assessment	50 or more residential units	See Traffic Mobility Management Plan
Mobility Management Plan / Travel Plan	20 or more residential units Any development with zero/reduced car parking.	See Traffic Mobility Management Plan
Road Safety Audit	Any development with construction of new roads,	See Quality Audit

Reports	Threshold	Application Reference
	materially affects vulnerable users and amends existing roads or generating significant road movement	
Site Specific Flood Risk Assessment	Any developments within a flood zone a and b	See Desktop Flood Risk Assessment
Engineering Services Report (Civil and Structural)	30 or more residential units	See Engineering Report
Site Investigation Report	All developments on site that comprise of contaminated lands and/or where basement is proposed.	See Site Investigation Report and Waste Classification Report
Construction Management Plan	30 or more residential units	See Construction & Environmental Management Plan
Construction Demolition Waste Management Plan	30 or more residential units	See Resource Waste Management Plan
Operational Waste Management Plan	30 or more residential units	See Operational Waste Management Plan
Climate Action and Energy Statement (including District Heating)	30 or more residential units	See Climate Action and Energy Statement, Sustainability & Part L Compliance Report
Noise Assessment	Any noise generating use and or any development within designated noise zones as indicated on development plan zoning maps.	n/a
Conservation report	Any development relating to a protected structure, within the curtilage of a protected structure, and / or effecting or within the curtilage of a protected monument.	Preliminary Heritage Impact Assessment Report. A full Conservation Report is not applicable for the subject site.
Retail Impact Assessment	Retail development *** of 2,000 sq. m (net comparison floorspace) and 1,500 sq. m. (net convenience floorspace) outside of the city centre and KUV's.	n/a
Ecological Impact Assessment	All developments that are located within or adjacent to any sensitive habitat, on sites that could contain protected species or in a quality landscape environment.	See Preliminary Ecological Appraisal.

Reports	Threshold	Application Reference
Appropriate Assessment Screening and NIS	An Appropriate Assessment Screening is required for all developments. A stage 2 (Natura Impact Statement) is required where significant effects on the environment are likely either alone or in combination with any other project.	See Appropriate Assessment Screening Report. NIS not required.
Environmental Impact Assessment	All developments within the threshold set out in Planning and Development Act 2000, as amended or any development that has a significant impact on the environment.	See EIA Screening Report.
Landscape and Visual Impact Assessment, Microclimate Assessment, Telecommunications Report – see Appendix 3	Site specific circumstances	A telecommunications report is required for applications of an increased height and/ or density. The tallest element of the proposal is 6 storeys. We note in general, and in accordance with the Building Height Guidelines and Development Plan, a default position of 6 storeys will be promoted in the city centre and within the canal ring subject to site specific characteristics. We consider that the proposal is not of significant increase in height or density to warrant a specialist Telecommunications Report to be prepared. There will be no impact on local telecommunications as part of the development.

A Schedule of Documentation prepared by MacCabe Durney Barnes accompanies this Part 8 application. In addition, to the above documentation, a number of additional documents accompany this application:

- A biodiversity enhancement plan has been incorporated within the Landscape Design Report.
- An Archaeological Impact Assessment prepared by John Purcell Archaeological Consulting accompanies this Part 8 application.
- A series of photomontages have been developed in respect of the scheme and accompany this application. Having regard to the modest scale of development at an infill site, the proposed insertion of the development within the existing landscape context is considered appropriate. The proposal has sought to



deliver a high quality residential development on the infill site while also enhancing the public realm. On account of the existing setting of the site, the proposed scheme will positively impact the landscape character and visual amenity on account of the existing setting.

**Green Infrastructure and Landscaping**

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

Standard	Development Response
<p>Analysis of the potential for the retention and integration of existing natural features, such as watercourses, mature planting and topography; this approach, in accordance with the National Landscape Strategy 2015–2025, ensures the landscape character of the area is retained and informs the proposed design.</p>	<p>The development works with the topography of the site which slopes down toward the Liffey to the south. As a result of the development, the ecological quality of the site will be improved owing to the implementation of high quality landscape proposals and SUDS measures.</p>
<p>The connectivity of proposed open spaces to adjoining existing open space or natural assets should also be considered with reference to the city’s green infrastructure in this development plan (Chapter 10) and any relevant local area plan(s); for sites which provide or adjoin habitats for species designated under the European Union Habitats Directive, Article 10 of the directive shall apply in regard to the need to provide connectivity and ‘stepping stones’ to ensure biodiversity protection.</p> <p>(see also GI7 ‘Connecting Greening Elements in Site Design’)</p>	<p>The proposed communal open space will be adjacent to the existing open space of the Stanhope Street complex. This will particularly allow to avoid impacting on the root protection zones of the trees adjacent to the north.</p>
<p>Potential applicants should refer to the Dublin City Biodiversity Action Plan 2021 – 2025 or subsequent plans and consult the City Council’s Parks, Biodiversity and Landscape Services Division to ascertain the significance of any ecologically sensitive areas which it may be appropriate to retain or integrate into a landscape plan. In such cases, the ecological attributes of the site and the impact of any development should be considered prior to final design.</p>	<p>The ecological quality of the site is limited and has limited ecological attributes.</p>

**Surface Water Management and SuDS**

Standard	Development Response
All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance.	A Surface Water Management Plan for the Development is incorporated into Malone O'Regan Engineering Report.
SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer	Please refer to the Engineering Report prepared by Malone O'Regan which provides a comprehensive overview of the SuDS measures proposed at the site. In addition, drawing no. SHB4-SSD-DR-MOR-CS-P3-150

**Green/Blue Roof**

Consideration	Development Response
All new development projects over 100 sq. metres to provide green roofs to assist in climate action and urban drainage in accordance with Policy SI23	The proposal includes green and blue roofs. Please refer to drawing no. SHB4-SSD-DR-MOR-CS-P3-150 and Engineering Report prepared by Malone O'Regan.

**Urban Greening**

Consideration	Development Response
All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc.	Please refer to landscape drawing no. 01 SSD Landscape Plan prepared by Mitchell + Associates.

**Landscape Plans and Design Reports**

Consideration	Development Response
Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	A Landscape Design Report prepared by Mitchell Associates accompanies this application.
Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans	Please refer to landscape drawing no. 01 SSD Landscape Plan prepared by Mitchell + Associates.
A tree survey must be submitted where there are trees within a proposed planning application site.	A comprehensive Arboricultural Impact Assessment and Tree Survey has been undertaken as part of this application. Please refer to Appendix B of the Arboricultural Impact Assessment for the Tree Survey Plans prepared.

**Public Open Space and Recreation**

Standard	Development Response
The design and layout of the open space should complement the layout of the surrounding built environment and complement the site layout.	The proposed development comprises 0.113 ha of public open space which equates to 10% of the site area. Sufficient circulation space is also allocated north and east of the public open space provision that will allow ease of movement for pedestrians.
Open space should be overlooked and designed to ensure passive surveillance is achieved	The proposed public open space is overlooked by Blocks A-C and Blocks D-G which will provide adequate passive surveillance. Please refer to Landscape Plan drawing prepared by Mitchell + Associates.
The space should be visible from and accessible to the maximum number of users.	Please refer to Landscape Plan drawing prepared by Mitchell + Associates.
Inaccessible or narrow unusable spaces will not be accepted.	No inaccessible or unusable spaces are proposed.
The level of daylight and sunlight received within the space shall be in accordance with the BRE Guidelines or any other supplementary guidance document – see Appendix 16	Please refer to the Daylight and Sunlight assessment prepared by Digital Dimensions with demonstrates the schemes compliance. All public and communal amenity areas meet and exceed the recommendations of the BRE guidelines, achieving sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21 <sup>st</sup> March
Any new public open space on the site should be contiguous to existing open space or natural feature (i.e. river corridors and canal bank) to encourage visual continuity and optimise value of ecological networks.	The proposed communal open space will be adjacent to the existing open space of the Stanhope Street complex. This will particularly allow to avoid impacting on the root protection zones of the trees adjacent to the north.
Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	Existing trees are limited and of poor quality and will not be retained. The development will include new tree planting and will maintain appropriate distances away from the root protection zones of the trees in the Stanhope Street open space.
Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.	
Landscaping works should be integrated with overall surface water management and SuDS strategy such that landscaping plans may include associated biodiversity areas or wetlands which can reduce / better manage surface water run-off.	A coordinated approach within the landscape design has been taken for water management, with the provision of permeable surfaces and build-ups throughout the scheme
Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Permeable surfaces will be encouraged (see Appendix 12).	The general planting strategy throughout the scheme is for significant structure tree planting with 2 metre clear stems to provide a leafy canopy layer, softening the proposed buildings and a base layer of shrub planting to create low level seasonal interest and colour softening the hard surfaced areas, curtilage and car parking. Eye level between the two planting

Standard	Development Response
	types is kept clear to maintain sight lines throughout the scheme. Throughout the scheme, the planting palette is uplifted with edible trees as part of the amenities provided for future residents. The priority is given to locally sourced and native planting, when appropriate, to enhance biodiversity and support the local biome.
Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	Please refer to section 6.5 of the Architect’s Design Statement prepared by Sean Harrington Architects.
Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.	High quality open spaces which provide health and social benefits for people through the provision of formal and informal nature-based play areas, safe and attractive areas and routes for meeting with a variety of seating areas proposed as part of the development for socialising and relaxing, accessible walking routes facilitated.
Age friendly measures should be incorporated into the design.	Please refer to the Landscape Plan and Landscape Design Report prepared by Mitchell + Associates. Age friendly design measures have been incorporated into the landscape design to support a pleasant, clean, accessible and safe public realm, create an inclusive community and age friendly spaces.
Permeability and accessibility for all users, particularly disabled persons should be provided	Please refer to the Architect’s Design Statement.
Cycle and pedestrian friendly routes should be accommodated.	Pedestrian and cycle movements are prioritised over car movements throughout the site.

**Boundary Treatments**

Standard	Development Response
Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.	Please refer to SHB4-SSD-DR-SHA-AR-P3-0005-Proposed Site Boundaries prepared by Sean Harrington Architects.

**Public Open Space**

Standard	Development Response
The planning authority will seek the provision of public open space in all residential schemes and commercial developments in excess of 5,000 sqm. In	0.11 ha of public open space is proposed which equates to 10% provision.

Standard	Development Response
accordance with Table 15-1, 10% is required in Z5 zoning.	

**Play Infrastructure**

Standard	Development Response
In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.	The proposal includes a 100 sqm play space for toddlers and children up to the age of six allocated within the public open space provision of the site. The landscaping strategy also includes an active recreation space within the public open space that consists of a basketball half-court, running loop and markings on the surface to indicate street games.

**Apartment Standards**

Standard	Development Response
<p><b>Unit Mix</b> Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.</p> <p>Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Housing &amp; Community Services Department.</p>	This part 8 proposal was formulated jointly with the DCC Housing & Community Services Department. The department has identified the need for the quantum proposed. The proposed unit mix will greatly contribute towards meeting the strong demand for this unit mix and housing typology in the area.
<p><b>Unit Size / Layout</b> Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments</p>	A HQA has been provided with this Part 8 application and provides a breakdown of each unit and demonstrates compliance. All units meet the floor area requirements.
<p><b>Dual Aspect</b> Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate</p>	94 apartment and duplexes are dual aspect. This equates to 56% of units.

Standard	Development Response
<p><b>Floor to Ceiling Height</b> A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided</p>	<p>The proposed development has been designed in accordance with these standards and therefore complies.</p>
<p><b>Lift, Stair Cores and Entrance Lobbies</b> a maximum of 12 apartment per core may be provided</p>	<p>The proposed development complies.</p>
<p><b>Internal Storage</b> Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments</p>	<p>Internal storage has been provided in accordance with the Apartment Guidelines.</p>
<p><b>Private Amenity Space</b> Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p> <p>At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.</p>	<p>All units have been provided either with private balconies or ground floor terraces. All private amenity spaces meet or exceed the minimum floor area requirements set out in Appendix 1 of the apartment guidelines.</p> <p>Please refer to drawing SHB4-SSD-DR-SHA-AR-P3-0009-Proposed Site Layout Plan for privacy strip at ground floor.</p>
<p><b>Communal Amenity Space</b> All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development. The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p>	<p>A large communal open space is provided to the rear of each of Blocks A-C and D-G. The proposed arrangement ensures that the communal space is secure, with access only possible for residents or invited guests. Appendix 1 of the Design Standards for New Apartments - Guidelines for Planning Authorities (2023) sets out minimum quantitative standards for communal open space and based on the number of units proposed a total of 1019 sqm is required therefore the proposed development exceeds this requirement and provides for a generous quantum of 1350 sqm communal open space.</p>
<p><b>Internal Communal Facilities</b></p>	<p>The development is for 167 units and includes 552 sqm of community, arts and cultural space. It was not</p>

Standard	Development Response
<p>Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents.</p>	<p>considered necessary to also provide communal space given the range in size of spaces proposed that will be accessible by residents.</p>
<p><b>Security</b> New apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas.</p>	<p>Please refer to section 13 of the Architect’s Design Statement, which addresses the requirements of the Dublin City Development Plan, 2022-2028, Chapter 15.4.5 - Safe and Secure Design.</p>
<p><b>Access and Services</b> Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.</p>	<p>All pedestrian and vehicular access points are clearly defined and overlooked by the perimeter blocks and have been designed to suit all users, regardless of their abilities.</p>
<p><b>Refuse Storage</b> Refuse storage and collection facilities should be provided in all apartment schemes.  All applications for 30 or more apartments should be accompanied by an Operational Waste Management Plan.</p>	<p>Refuse storage is provided, please refer to drawing no. SHB4-SSD-DR-SHA-AR-P3-0009 Proposed Site Layout Plan.  An Operational Waste Management Plan accompanies this part 8 application.</p>
<p><b>Lifecycle Reports</b> All residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.</p>	<p>A Building Lifecycle Report accompanies this application.</p>
<p><b>Operational Management and Maintenance</b> All apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building.</p>	<p>A Building lifecycle report accompanies this application. It is intended that the development will be delivered through a Public Private Partnership (PPP) structure which will include maintenance and tenancy management services. Under this arrangement, the appointed PPP Company in partnership with an Approved Housing Body, will be responsible for the maintenance and management of the development and the life cycling of building elements on behalf of Dublin City Council and the residents over a 25-year period. Thereafter the maintenance and management of the development will be handed over to Dublin City Council.</p>
<p><b>Microclimate – daylight and sunlight, wind and noise</b> All apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind</p>	<p>The City Development Plan 2022-28 addresses Microclimate at Section 15.9.16 Microclimate – Daylight and Sunlight, Wind and Noise. 15.9.16.3 specifically refers to Noise. The site is not within a designated noise zone as indicated on the</p>

Standard	Development Response
	<p>development plan zoning maps. A noise impact assessment is therefore not required in this location.</p> <p>Having regard to the proposed height, prevailing building heights and the block layout proposed, it is not considered necessary to undertake a microclimate study as part of the development.</p> <p>A Sunlight and Daylight Assessment has been undertaken by Digital Dimensions.</p>
<p><b>Daylight and Sunlight</b> A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.</p>	<p>A daylight and sunlight assessment accompanies this part 8 application.</p>
<p><b>Separation Distance</b> Traditionally a minimum distance of 22m is required between opposing first floor windows.</p>	<p>The recently issued Compact Settlement Guidelines for Planning Authorities SPPR1 reduces the separation distance to a 16 meter distance, or below in certain circumstances.</p> <p>The proposed separation distance between opposing windows of the apartment blocks on all levels are in excess of 16m.</p> <p>The proposed separation distance complies with this requirement</p>

**Standards as Derived from the Appendices**

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

Standard	Development Response
<p><b>Density Ranges</b> Table 1 – Appendix 3 state that density in the City Centre should be within a range of 100-250 uph.</p>	<p>The proposed development has a density of 148.7 uph and therefore is well within the range of the CDP.</p>
<p><b>Plot ratio and coverage:</b> The site is located within the central area, therefore the following requirements are applicable: Indicative plot ratio – 2.5-3.0 Indicative Site Coverage – 60-90%</p>	<p>The proposed plot ratio is 1.64. The proposed site coverage is 35.3%.</p> <p>The proposed development is below the indicative plot ratio and site coverage percentage indicated in the Development Plan, however, it is noted that these standards are indicative rather than fixed.</p>



Standard	Development Response
<p><b>Bicycle Parking Standards</b> Table 1 of appendix 5 sets out parking standards:</p> <p><b>Residential</b> Long stay: 1 space per bedroom in residential apartments Short stay: 1 per two apartments</p> <p><b>Community/ Arts/ Culture</b> Long stay: 1 space per 5 staff in community centre Short stay 1 per 100 sqm Gross Floor Area for community centre</p> <p><b>Creche</b> Long Term – 1 per 5 staff and 1 per 10 children</p>	<p>In accordance with table 1 of appendix 5, the proposed development requires 264 long term spaces and 94 short term bicycle spaces for the residential and non-residential components of the development.</p> <p>As part of the application, it is proposed to deliver 270 long stay spaces and 101 short stay spaces.</p> <p>Adequate space for cargo bike parking is also provided.</p>
<p><b>Car Parking Standards</b> The site falls under Zone 1 – Canal Cordon and North Circular Road Based on the proposal at this site the following standards apply:</p> <p><b>Residential</b> 0.5 per dwelling</p> <p><b>Community/ Arts/ Culture</b> 1 per 350 sqm GFA</p> <p><b>Creche</b> 1 per 100 sqm GFA</p>	<p>A maximum of 84 parking spaces are required for the site for the residential units and nine spaces for the creche and community centre. However, the Development Plan notes that a reduced car parking provision may be acceptable where the Council is satisfied that good public transport links are already available or planned and/or a Mobility Management Plan for the development demonstrates that a high percentage of modal shift in favour of the sustainable modes will be achieved through the development.</p> <p>The proposed development includes 19 no. spaces which equates to a ratio of 0.11 per unit.</p>
<p><b>Electric Vehicles</b> All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.</p>	<p>Please refer to Climate Action, Sustainability and Part L Report and drawing no. SHB4-SSD-DR-SMK-ME-P3-6035-EV Car Charging P01. The proposal for this development is that 50% all public spaces will have EV chargers installed in line with DCC development plan and the rest will ducted for future EV charging points.</p>
<p><b>Motorcycle Parking</b> New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided</p>	<p>1 no. motorcycle space is proposed as part of the development.</p>
<p><b>Waste Storage Facilities</b></p> <ul style="list-style-type: none"> <li>• Receptacles that are designed for reuse, with the exception of a specific area designated by a local</li> </ul>	<p>The proposed Waste Storage Area for Apartment Blocks are located on ground level. Refer to drawing</p>

Standard	Development Response
<p>authority as being only suitable for the collection of nonreusable receptacles such as bags, ideally of 1,100 litre capacity, must be used.</p> <ul style="list-style-type: none"> <li>To provide a three-bin collection system for residents in communal collection schemes, for each type of waste: general (residual) waste, dry mixed recyclables and organic waste. A proposal on the three-bin system including bin quantity, type and frequency of collection must be submitted in writing to the Waste Regulation Unit in Dublin City Council for agreement. Sufficient space must be provided to accommodate the collection of dry mixed recyclables and organic waste.</li> <li>Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes.</li> </ul>	<p>no. SHB4-SSD-DR-SHA-AR-P3-0009-Proposed Site Layout Plan prepared by Sean Harrington Architects.</p> <p>The proposed waste storage facilities accord with these requirement, please refer to the Operational Waste Management Plan prepared by Traynor Environmental which accompanies this application</p>
<p><b>Green and Blue Roof</b></p> <p>Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application.</p> <p>The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.</p> <p>Minimum coverage for an extensive green roof is 70% Minimum coverage for an intensive green roof is 50%.</p>	<p>Please refer to Engineering Report prepared by Malone O'Regan and refer to Malone O'Regan SuDS detail drawing no. SHB4-SSD-DR-MOR-CS-P3-150</p>
<p><b>SuDS Requirements</b></p> <p>SuDS requirement 1 – runoff destination SuDS requirement 2 – hydraulic control SuDS Requirement 3 – Water Quality SuDS Requirement 4 – Amenity SuDS Requirement 5 - Biodiversity</p>	<p>Please refer to the accompanying Engineering Report prepared by Malone O'Regan for details of the proposed SuDS measures. Refer to the Malone O'Regan SuDS detail drawing no. SHB4-SSD-DR-MOR-CS-P3-150</p>
<p><b>Surface Water Management Planning</b></p> <p>Development including or in excess of 2 no. residential units or 100 sq. m. of nonresidential uses (including social and community uses)</p> <p>All developments with surface water implications which fall within these thresholds will be required to</p>	<p>Please refer to the Engineering Report prepared by Malone O'Regan which details the surface water management proposed as part of the project.</p>

Standard	Development Response
prepare a SWMP as part of their project design process.	

## 8. ENVIRONMENTAL ASSESSMENTS

### 8.1 Site Investigation Report

A site Investigation Report has been prepared as part of this Part 8 application. A summary of the findings is detailed below.

In November and December 2023 IGSL completed a comprehensive programme of site investigations for the site. These investigations showed that ground conditions consisted of concrete ranging from 140mm to 300mm thickness. Beneath the concrete pavement, mixed clay made ground was observed to range in depth from 0.85 bgl to at least 2.0m and with grey brown gravelly Clay with red brick fragments noted to a depth of 2.90m.

Overall, there appears to be a lower accumulation of Made Ground towards the southeast and south of the site. This is evidenced in two test boreholes where no Clay Made Ground was recorded with firm to stiff indigenous soils in their place. The accumulation of made ground appears to reduce to the south and southeast of the site with firm to stiff indigenous soils present. The natural soils below the made ground layer consisted of soft brownish grey sandy gravelly clay with cobbles from 0.95m to 1.9m below ground level. This soil layer exhibited a strong hydrocarbon odour. No natural soils were encountered in some trial pits consisting predominantly of made ground. Underlying the above layers was a glacial till comprising of a firm to stiff grey brown to dark grey brown slightly sandy gravelly cobbly clay extending to depths of up to 5.5m below ground level. A strong hydrocarbon odour was noted in BH03 (0.40-3.40m), BH07 (2.30-3.70m), TP01 (0.95-2.50m) and TP05 (0.18-0.50m). A strong hydrocarbon odour and visible staining was noted in all window sample locations.

IGSL collected the samples and placed them in laboratory prepared containers that were stored in coolers prior to shipment to Chemtest Ltd for laboratory testing. As detailed in the accompanying Waste Classification Report prepared by O'Callaghan Moran & Associates, asbestos was not detected in any of the samples tested. The testing found that in a number of samples were tested as hazardous for total petroleum hydrocarbons concentrations. All other samples are classified as non-hazardous. Instances of C&D waste containing hazardous substances may be encountered. As such, coordination with facilities such as those listed in Table 2.6 of the accompanying Resource Waste Management Plan will be necessary.

### 8.2 Environmental Impact Assessment

An Environmental Impact Assessment (EIA) Screening report was prepared by MacCabe Durney Barnes to accompany this Part 8 application. It concludes:

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

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

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

### 8.3 Appropriate Assessment

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

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

**1. No likelihood of significant effects**

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

**2. Significant effects cannot be excluded**

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

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

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

*Appropriate Assessment Screening must consider the potential implications of a project both in isolation and in combination with other plans and projects in the surrounding area. An 'in-combination effect' can occur when a project will have a perceptible but non-significant residual effect on a European site (when considered in isolation), that subsequently becomes significant when the additive effects of other plans and projects are considered. However, as the proposed development poses no risk of impacts on European sites in isolation, the risk of in-combination effects can also be ruled out.*

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

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

### 8.4 Preliminary Ecological Appraisal

A Preliminary Ecological Appraisal (PEA) accompanies this Part 8 application prepared by NM Ecology. As there are no existing habitats within the Site, the hazardous waste discussed under section 8.1 of this report will have no ecological impacts within the Site. There are no connections to any watercourses so there is also no risk that hazardous waste will have any impact on ecological features outside the Site.

The PEA report concludes:

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

## 8.5 Desktop Flood Risk Assessment

A desktop Flood Risk Assessment has been prepared by Malone O'Regan. The report concludes:

*“The analysis and flood zone delineation undertaken as part of this DFRA indicates that the proposed site is not expected to be impacted during the occurrence of a 0.1% AEP (1 in 1000 year) fluvial flood event.*

*The PFRA flood mapping indicates that the proposed development site does not fall within the predicted extreme 0.1% (1 in 1000 year) current scenario fluvial flood zone.*

*The node point closest to the western boundary of the site is referenced as node point 09LIFF00452. The 1% AEP (1 in 100 year) and 0.1% AEP (1 in 1000 year) flood levels at this point are predicted as 2.92m and 3.23m respectively.*

*According to the SFRA of the Dublin City Development Plan 2022 – 2028, it is recommended that for a scenario of fluvial event-undefended, the minimum finished floor level is to be based on 1% AEP flood + climate change (20% allowance for highly vulnerable development) + 300mm freeboard i.e., = 2.92m with 20% + 0.3m = 3.22m.*

*The development site passes the Justification Test for Development Plans.*

*A review of the OPW Tidal Flood Extents Mapping was carried out and indicates that the proposed development site does not fall within a the predicted extreme 0.1% (1 in 1000 year current scenario) tidal flood event.*

*In consideration of the above assessment, analysis and recommendations, overall development of the site is not expected to result in an adverse impact to the existing hydrological regime of the area or to result in an increased flood risk elsewhere.”*

## 9. CONCLUSIONS

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

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

The proposed development will make a positive contribution to the consolidation of the urban fabric in Dublin 7, particularly as it reuses the site of the former Dublin Fire Brigade Maintenance Depot. It will generally improve the outlook of the area, particularly along the western side of Grangegorman Lower. The housing mix is reflective of the Sub-City Dublin 1 HNDA and DCC housing waiting lists will make positive contributions to meeting the housing needs of area P.

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



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