

Planning Statement

Social Housing Bundle 4, Development at Collins Avenue,
Whitehall

Dublin City Council

July 2024



MACCABE DURNEY BARNES



20 Fitzwilliam Place, Dublin 2,
D02YV58, Ireland



Phone. +353 1 6762594



planning@mdb.ie



www.mdb.ie

Document status					
Job Number: 2209					
Job Title: Social Housing Bundle 4 Collins Avenue					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
0	Draft	SB	RH		31/01/24
1	Pre-Part 8 Draft	MB	RH	RH	19/04/24
2	Part 8 Submission	MB	RH	RH	19/07/24

© Copyright MacCabe Durney Barnes Limited. All rights reserved.

The report has been prepared for the exclusive use of our client and unless otherwise agreed in writing by MacCabe Durney Barnes Limited no other party may use, make use of or rely on the contents of this report. The report has been compiled using the resources agreed with the client and in accordance with the scope of work agreed with the client. No liability is accepted by MacCabe Durney Barnes Limited for any use of this report, other than the purpose for which it was prepared. MacCabe Durney Barnes Limited accepts no responsibility for any documents or information supplied to MacCabe Durney Barnes Limited by others and no legal liability arising from the use by others of opinions or data contained in this report. It is expressly stated that no independent verification of any documents or information supplied by others has been made. MacCabe Durney Barnes Limited has used reasonable skill, care and diligence in compiling this report and no warranty is provided as to the report’s accuracy. No part of this report may be copied or reproduced, by any means, without the written permission of MacCabe Durney Barnes Limited.



TABLE OF CONTENTS

1.	INTRODUCTION.....	1
1.1	Background.....	1
1.2	Background of the Part 8 Application.....	1
1.3	Structure of the Planning Report.....	1
2.	SITE LOCATION AND CONTEXT.....	2
2.1	Site Location.....	2
2.2	Site Description.....	2
2.3	Transportation.....	3
3.	PLANNING HISTORY.....	8
3.1	Subject Site.....	8
3.2	Surrounding Area.....	8
4.	SITE SELECTION AND CONSIDERATION OF ALTERNATIVES.....	11
4.1	Site Selection.....	11
4.2	Consideration of Housing Tenure and Types.....	11
4.3	Consultation.....	12
5.	CONSIDERATION OF DESIGN.....	16
6.	PROPOSED DEVELOPMENT.....	17
6.1	Project Description as per Public Notices.....	17
6.2	Detailed Description.....	18
6.3	Design Rationale.....	19
7.	PLANNING POLICY.....	21
7.1	National Policy.....	21
7.2	Ministerial Guidelines.....	23
7.3	Regional Policy.....	44
7.4	Local Policy.....	44
8.	ENVIRONMENTAL ASSESSMENTS.....	64
8.1	Environmental Impact Assessment.....	64
8.2	Appropriate Assessment.....	64
8.3	Preliminary Ecological Appraisal.....	65
9.	ENGINEERING.....	66
9.1	Foul Water.....	66
9.2	Water Supply.....	66
9.3	Surface Water.....	66
10.	CONCLUSIONS.....	67

TABLE OF FIGURES & LIST OF TABLES

Table 1: Proposal Details.....	18
Table 2: Overall Breakdown of Units.....	19
Table 3: Summary of Design Statement Response to the Specific Criteria	26
Table 4: Minimum Requirements for communal amenity space	36
Table 5: SPPRs.....	38
Table 6: Development Management Criteria.....	39
Table 7: Planning Application Documentation	49
Figure 1: General Location	2
Figure 2: Site Context.....	3
Figure 3: Walkability Patterns in 5,10 and 15 minute intervals (Source: ArcGIS).....	4
Figure 4: Collins Avenue Area BusConnects Map (Source: NTA, 2022).....	5
Figure 5: MetroLink Railway Order – Route Alignment (Source: TII and NTA, 2022)	6
Figure 6: Proposed Active Travel Network Post 2027 (Source: DCC).....	7
Figure 7: Nest SHD Site Layout (Source: Coady Architects as displayed on nestshd.ie)	8
Figure 8: Extract from Contextual Elevation Drawing showing the relationship with the Part 8 Site (Source: Coady Architects as displayed on nestshd.ie)	9
Figure 9: Proposed site layout (Source: Coady Architects).....	18
Figure 10: Extract from the DCC CDP Land Use Zoning Map (Source: DCC)	45

1. INTRODUCTION

1.1 Background

This planning report was prepared by MacCabe Durney Barnes on behalf Dublin City Council and National Development Finance Agency (NDFA), to accompany a Part 8 proposal of 106 no. units on a site of circa. 1.72 hectares in area, located at the former Bring Centre and DCC depot site, Collins Avenue, Whitehall, Co. Dublin.

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 of the Part 8 Application

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

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

The Collins Avenue site includes apartment units. The development will be tenanted from Dublin City Council's Housing Lists, in accordance with the scheme of allocations. The proposed development has been designed by the 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 106 residential units and 375 sqm of community, arts and cultural floorspace, at a site c. 1.72 ha located at the site of the former bring centre on Collins Avenue, Whitehall, Dublin 9.

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 former Dublin City Council bring centre and depot site, which has been relocated to the new purpose built Council North City Operations Depot in Ballymun. The subject site is located in Whitehall, around 4km north of the City Centre. The site, c. 1.72 ha is a brownfield field broadly located to the north of Collins Avenue and south of the Shanowen Business Centre in Whitehall. Dublin City University (DCU) is located on the southern side of Collins Avenue. Located to the east of DCU is St Aidan’s CBS, which also includes sports facilities such as the Glasnevin Basketball Club, the St Kevin’s All Weather Pitch and the St Aidan GAA Pitch.

The Swords Road (N1) is located around 820m east of the site and links Dublin Airport to the City Centre. The Ballymun Road is located around 700m west of the site.

The site is accessed by Collins Avenue and Collins Avenue Extension. Since the relocation of the bring centre and depot, the site is inaccessible to members of the public.

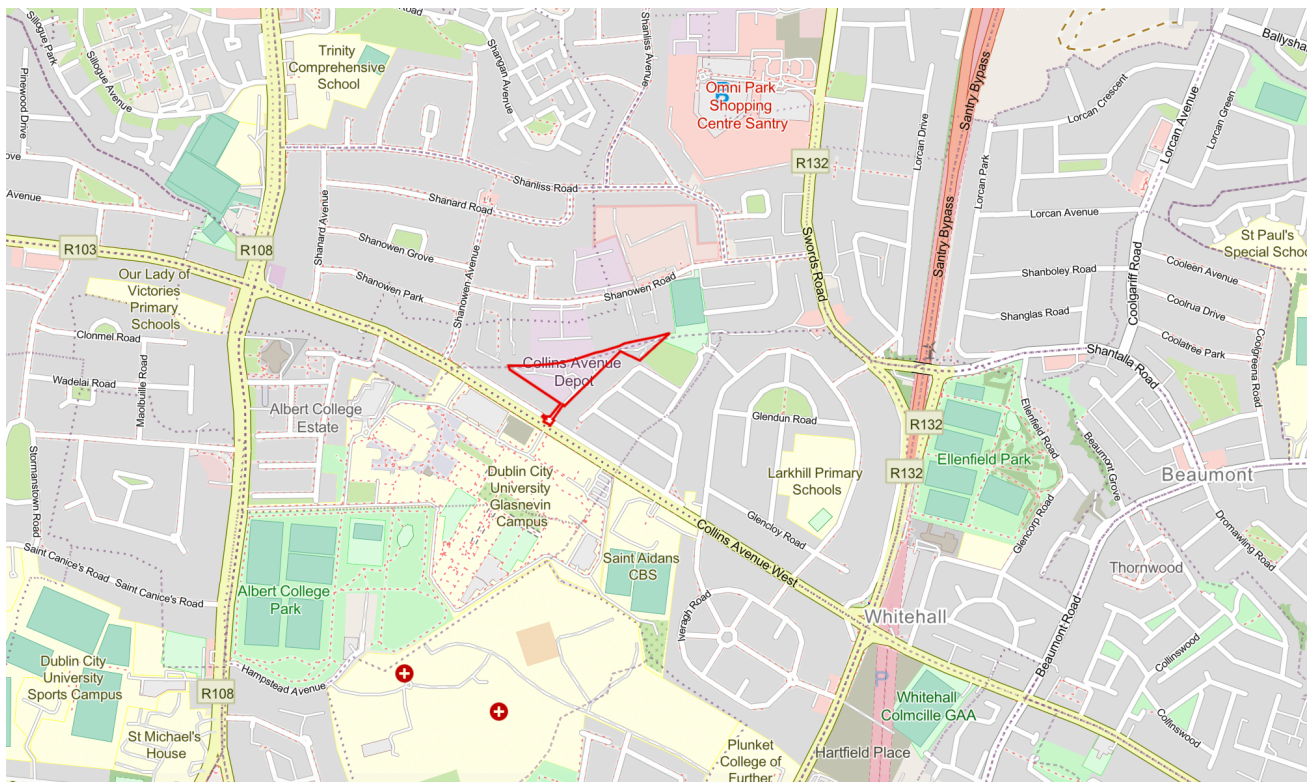


Figure 1: General Location

2.2 Site Description

The site is bound to the north by the Shanowen Business Estate and the Shanowen Hall and Square. The Shanowen Business Estate is generally characterised by two-storey high buildings and includes a mix of warehouses and office space. Shanowen Hall and Shanowen Square together form a student accommodation complex. It is closed off to the public by two gates on Shanowen Road, where the main accesses are located. A Spar convenience shop is located at ground floor of the western block. There are some trees separating the

Shanowen complex from the part 8 site. Milner’s Square is located to the north west of the site. It is a 5-storey over basement residential complex which also includes a creche at the north east corner.

St Kevin’s Football Club is located to the north east corner of the site and includes one five-a-side pitch and a full size soccer pitch. Its changing room / clubhouse is located to the south, near the boundary with the open space serving the Crestfield Estate. The Crestfield estate bounds the part 8 site to the east, which includes Crestfield Close, Crestfield Drive, Crestfield Park and Crestfield Avenue. It is characterised by two-storey high semi-detached houses. There are trees along the eastern boundary separating the houses on Crestfield Close and the site.

The site is bound to the south by house no. 630 to 662 Collins Avenue. These are two-storey high semi-detached houses with side garages. Generally, the houses are located over 20m from the boundary with the Part 8 site.

The part 8 site is the former bring centre and Dublin City Depot. It is fully tarmacked and includes a number of sheds and warehouses. It is closed off by a gate on Collins Avenue. There is a thick tree boundary between the site and no. 630 to 662 Collins Avenue. Most trees along the boundary are rated C2 of low quality, with the exception of 10 no. U category trees (cannot be retained). The Wad Stream (culverted stream) transverses across the site along the northern boundary.



Figure 2: Site Context

2.3 Transportation

The site is served by Bus top no. 1646 and 1644 along Collins Avenue Extension with Dublin Bus route 123 serving these stops. Route 123 serves travel between Marino towards Walkinstown (Kilnamanagh Rd). In general

services operate every 12 minutes during the weekdays, c. 15 minutes on Saturdays and c.30 minutes on Sundays. In addition to the current routes servicing the subject site, a number of improved services are earmarked for delivery that are relevant to consider in the context of the proposed development.

2.3.1 Accessibility

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

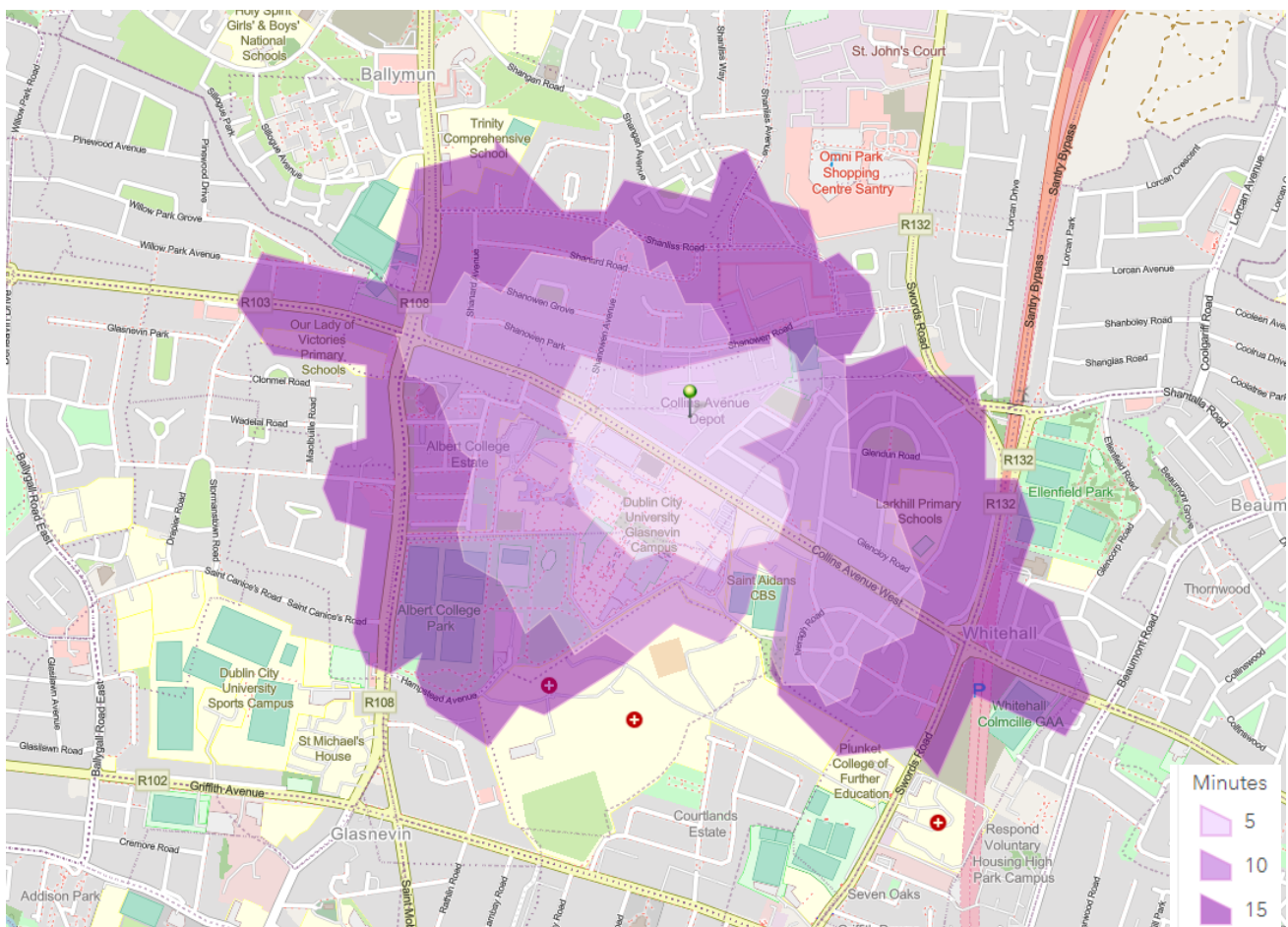


Figure 3: Walkability Patterns in 5,10 and 15 minute intervals (Source: ArcGIS)

2.3.2 BusConnects

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

The site is surrounded by a range of routes, in particular the A and E spine are located in close proximity to the subject site. Along Collins Avenue, the A3, N4 and L80 will travel. The A spine serves travel between Swords Road- City Centre – Terenure. This route will operate at a frequency of every 3 minutes during peak hours. The A3 route which travels along Collins Avenue Extension, immediately south of the site serves travel between DCU-

City Centre-Tallaght. This service will operate at a frequency of 12-15 minutes during the weekdays. The E spine provides travel between Ballymun-City Centre-Foxrock Church. This service will operate at a frequency of between 8-10 minutes generally throughout the weekdays. The N4 route serves travel between Blanchardstown Shopping Centre- Finglas-DCU-Collins Avenue-Docklands. The Ballymun to City Centre route has been granted planning permission by An Bord Pleanála on 12th March 2024.

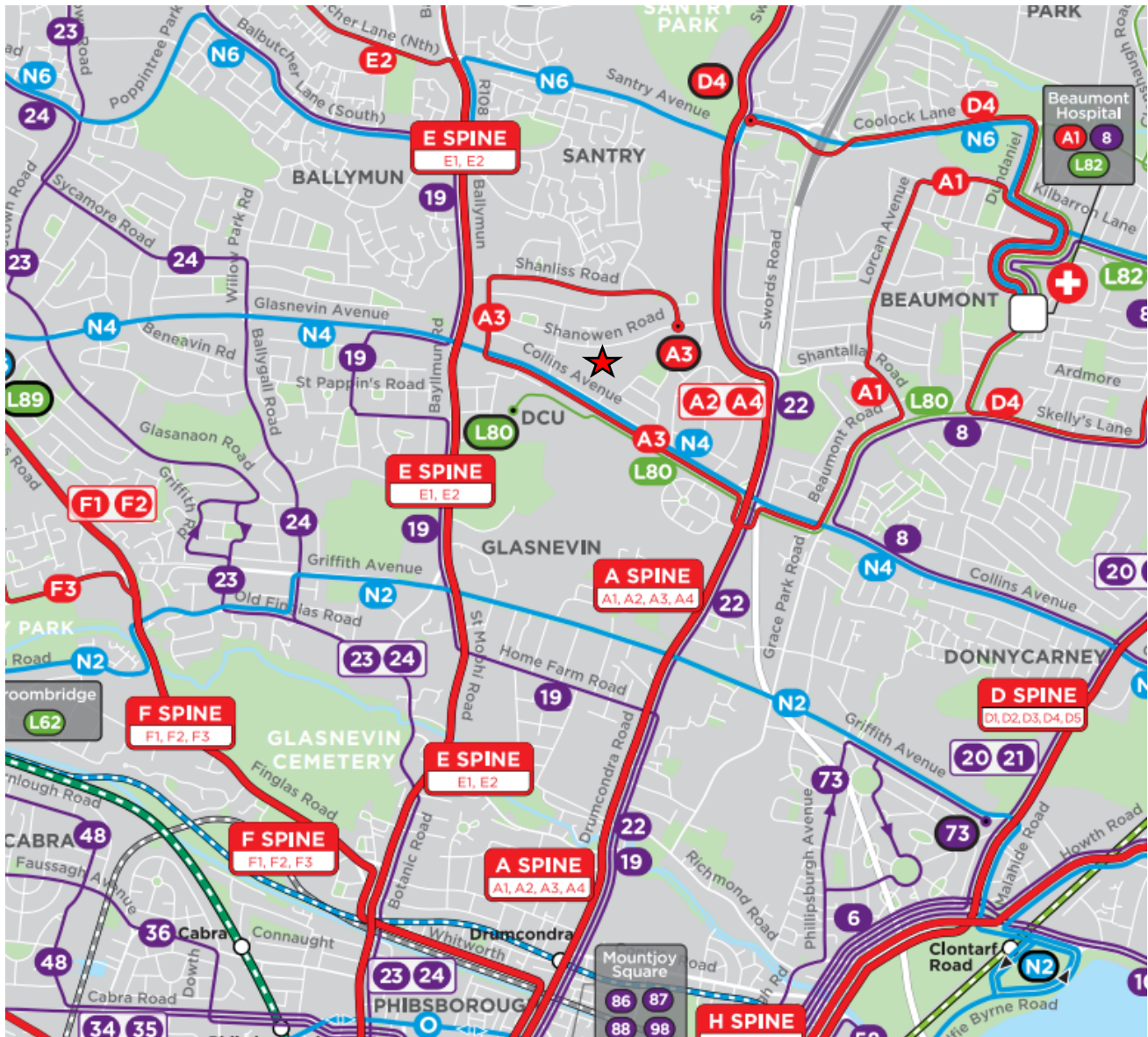


Figure 4: Collins Avenue Area BusConnects Map (Source: NTA, 2022)

2.3.3 Metrolink

MetroLink is a transformative piece of new public transport infrastructure, the first of its kind in Ireland. It will comprise a high-capacity, high-frequency, modern and efficient metro railway, with 16 new stations running from Swords to Charlemont. When operations commence there will be trains every three minutes during peak periods. This can rise to a service every 90/100 seconds by 2060 if required. The system will be capable of carrying up to 20,000 passengers per hour in each direction. As well as linking major transport hubs, MetroLink will connect key destinations including Swords, Collins Avenue, the Mater Hospital, the Rotunda Hospital, Dublin

City University and Trinity College Dublin. The site is located approximately c.600m from the proposed Collins Avenue station.

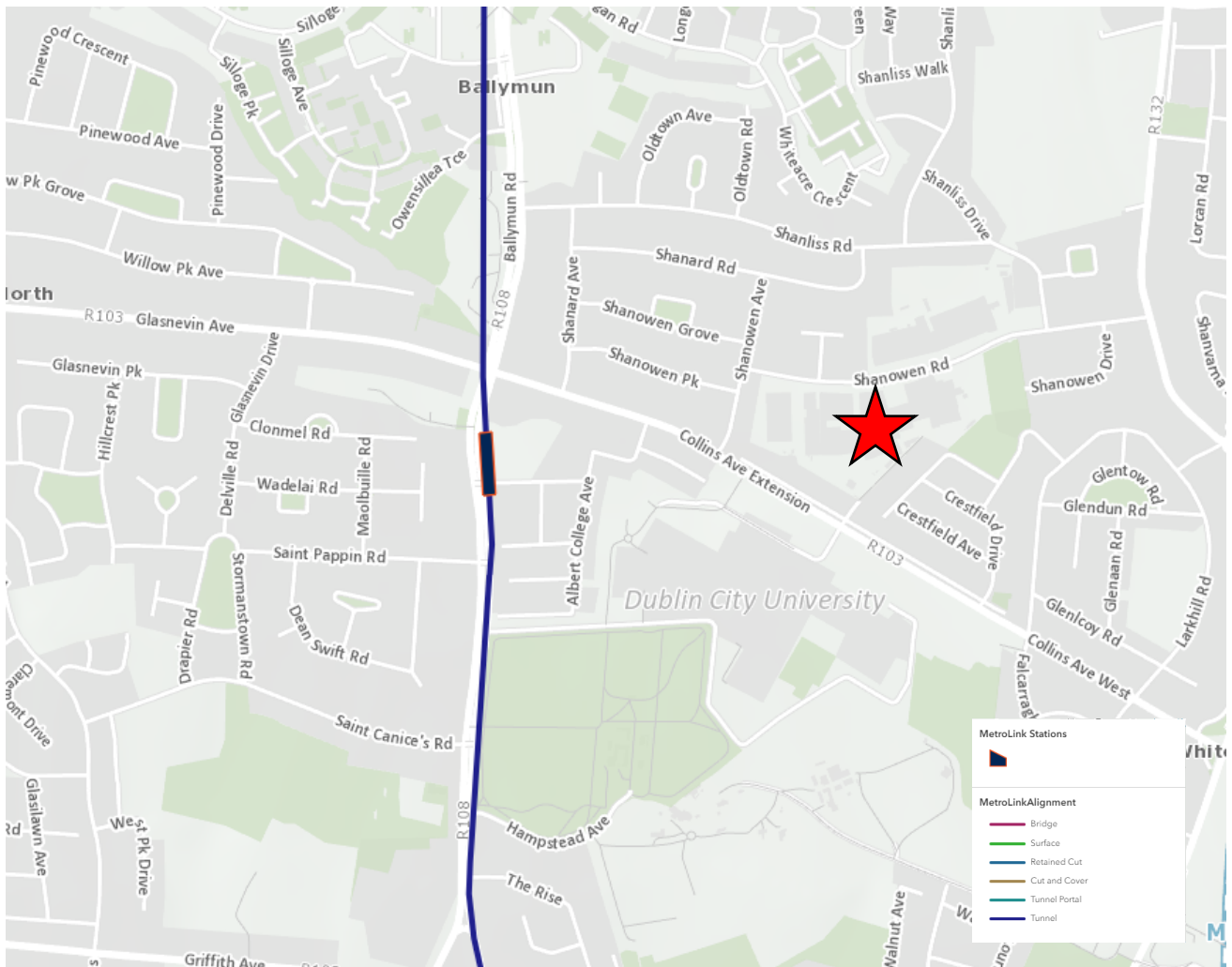


Figure 5: MetroLink Railway Order – Route Alignment (Source: TII and NTA, 2022)

2.3.4 Cycling

The proposed programme illustrated below demonstrates that the development site will be located in close proximity to high quality active travel infrastructure, which will allow for greater ease of accessibility to social and community infrastructure identified in this report. The development site is accessed from Collins Avenue Extension which is earmarked for improvements between 2025-2027.

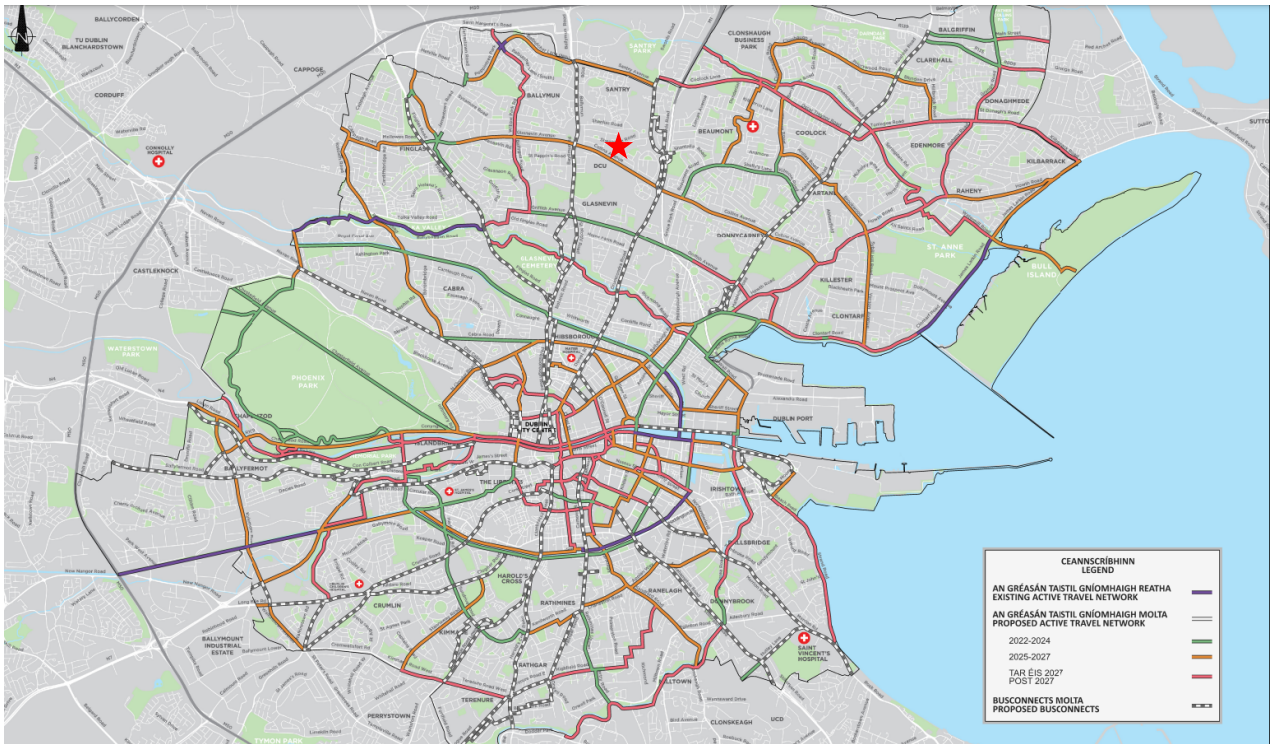


Figure 6: Proposed Active Travel Network Post 2027 (Source: DCC)

3. PLANNING HISTORY

3.1 Subject Site

There is no planning history on the part 8 site.

3.2 Surrounding Area

The most relevant applications are presented below.

3.2.1 Shanowen Road

ABP.Ref.313125-22, 'Nest SHD': A planning application for a Strategic Housing Development (SHD) consisting of 593 student bedspaces was made at the site of the Shanowen Business Centre and Kaybee House. The development will be arranged in 5 blocks with two buildings. The blocks range in height from 4-6 storey. The application was lodged in March 2022 and has not been determined yet.

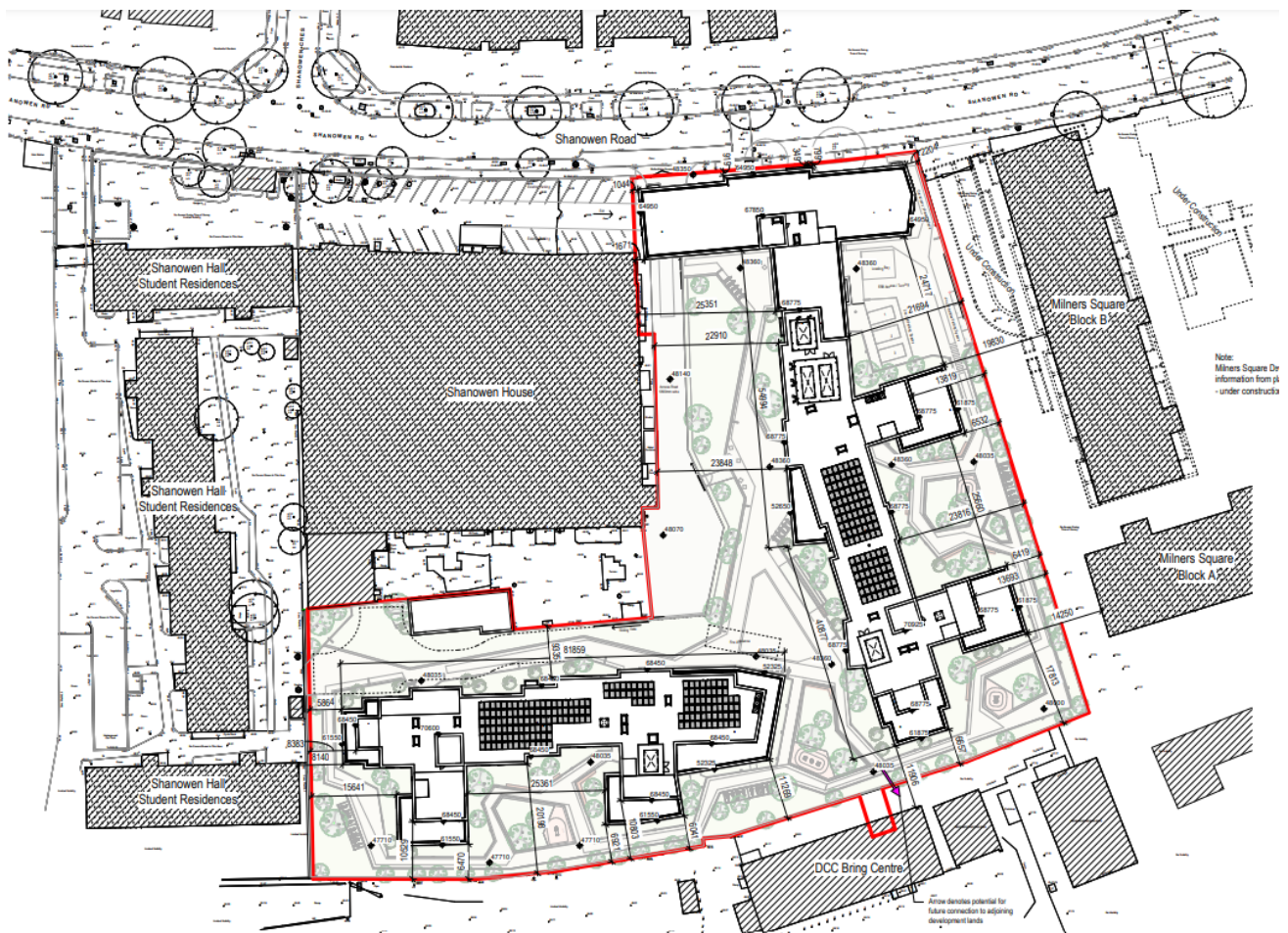


Figure 7: Nest SHD Site Layout (Source: Coady Architects as displayed on nestshd.ie)



Figure 8: Extract from Contextual Elevation Drawing showing the relationship with the Part 8 Site (Source: Coady Architects as displayed on nestshd.ie)

The Milner residential complex located at Shanowen Business Park, Shanowen Road, Santry, Dublin 9 was subject to a number of applications between 2004 and 2020 (PA.Reg.Ref. 2039/20; PA.Reg.Ref. 6058/04 and ABP.Ref.PL29N.211692 as extended by PA.Reg.Ref. 6058/04/X1, PA.Reg.Ref.6058/04/X2 and PA.Reg.Ref.6058/04/X3) and as previously revised by PA.Reg.Ref.4128/18, PA.Reg.Ref.4360/17 and PA.Reg.Ref.4068/17. Other planning references include 2306/21, PA.Reg.Ref. 2891/19 and PA.Reg.4128/18 The complex which includes 330 no. apartments has now been built and is occupied.

PA.Reg.Ref.3923/20 / ABP.Ref.309693-21: Planning permission was refused by DCC but overturned by An Bord Pleanála for the installation of 9 no. 2m high antenna, 9 no. 0.8m antenna and 6 no. 0.6m transmission dishes on ballast mounted supporting poles together with equipment cabinets, cabling and associated site works at the roof level at Milner’s Square Block B.

3.2.2 DCU Campus

ABP.Ref.305405-19: Planning permission was granted for a Strategic Housing Development consisting of 1,240 bed space at a site located in the DCU Campus. The development also includes complementary student amenity spaces and a retail/café/ education unit. Permission was granted by An Bord Pleanála in December 2019 and the development is currently under construction.

3.2.3 Other Relevant Developments

ABP.Ref.313289-22: Construction of seven apartment blocks including 472 apartment units, of which 32 no. would be studio, 198 no. 1-bed, 233 no. 2-bed and 9 no. 3-bed. The development also includes a creche (445.76 sqm) and a café (99 sqm) and 6,165 sqm of public open space. Planning permission was granted in November 2022. The strategic housing development is located at a site which forms part of the Dublin Port Tunnel Compound at the corner of Collins Avenue and the Swords Road.

PA. Reg. Ref. 3927/22: Part 8 development at a site forming part of the aforementioned Dublin Port Tunnel Compound consisting of the construction of 83 dwellings and a community units (47sqm). The development was approved on the 5th September 2022.

LRD6019/22: Construction of 853 units comprising 343 social housing units (40%), 340 cost rental units (40%) and 170 affordable purchase units (20%), a 2-storey crèche (with capacity for 154 children) on a site of approx. 17.1 ha known as the 'Oscar Traynor Road Site, Dublin 5/Dublin 9, bounded by Coolock Lane (R104) to the north, Castletimon estate to the east, Lorcan estate to the south and by the N1 to the west, south-east of the M50 Junction 2 Interchange. Planning permission was granted in July 2023. This development is located c.1.5 km from the subject site.

ABP Ref. 314724: MetroLink Rail Order Application to An Bord Pleanála. This application is under consideration by An Bord Pleanála. The proposed Collins Avenue Station is proposed c. 600m from the proposed site.

ABP Ref. 314610: BusConnect Ballymun/Finglas to City Centre Core Bus Corridor Scheme was granted permission by An Bord Pleanála on 12th March 2024. The development consists of a sustainable transport scheme which provides for both cycle and bus priority measures over a distance of 11km and will be comprised of two main alignments, from Ballymun to the City Centre (the Ballymun Section) and from Finglas to Phibsborough (the Finglas Section). The route is proposed along the Ballymun Road which is c. 600m from the 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 utilised to meet some of the demand for social housing arising in Dublin City and particularly in and around Whitehall and Dublin 9. Whitehall is a well-established residential area. The site's former use was at odds with the surrounding area which largely consists of residential and educational use with some employment. Site selection was restricted to consideration of that land in 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 CDP zoned the site Z1 'Sustainable Residential Neighbourhoods'. The Collins Avenue Bring Centre permanently closed on Friday, 28th July 2023 with services relocated to the new purpose-built facility in Ballymun.

The site is located within an established residential neighbourhood, in close proximity to community facilities, shops and public transport. It is ideally located to meet the principles of the 15-minute City as envisaged in the Dublin City CDP 2022-2028.

4.2 Consideration of Housing Tenure and Types

The provision of social housing units on this site will facilitate diversity in tenure and facility housing mix in this part of the City. The general area of Whitehall is largely dominated by semi-detached and terraced housing. Data extracted from the 2022 census shows that 85.9% of the residential stock in the area¹ consists of houses. The stock is also, for the vast majority, privately owned (with or without mortgage) (69%). If those who rent from a private landlord are considered as well, this means that over 88% of the housing stock in the area is either privately owned or rented. In terms of stock rented from Local Authority or rented from a voluntary body this equates to 5.9% of the study area. The proposed development of 106 social homes will help alleviate the dominance of private housing in the area. Even taken cumulatively with other social housing development in the area, including that further east at the Dublin Port Tunnel Compound, there will not be a dominance of social housing in the area with shares as part of the overall housing mix remaining relatively modest.

The site is located in Housing Area E of the Council's housing waiting list. Data obtained from the Council dated from October 2023 Under Area E, there are 81 households in band 1 (highest priority need), another 1,086 in band 2 and 960 in band 3. There are an additional 1,537 households also awaiting transfer to area E. Cumulatively, 46.9% of the households require a 1-bed unit, and a further 34.6% require a 2-bed unit. The general area as described in the previous paragraphs is largely dominated by 3-bed type units. The existing housing stock consists of 47.9% 3-bed units and only 4.6% one-bed, clearly showing a mismatch between demand and supply. The proposed development includes 59 no. 1-bed or 45% of the overall mix. This will help alleviate demand in the area.

The site is located in the mature residential suburb of Dublin City which avails of a variety of public facilities as well as being located near high quality public transport. In the Core Strategy, the CDP puts the emphasis on

¹ Including the Whitehall A, B and C and Beaumont A electoral divisions

compact growth and supports the sustainable development brownfield and infill sites. This reflects the contents of the Apartment Design Guidelines which recognise in section 2.3 that a greater proportion of housing should take place within the existing built-up footprint of cities, with a brownfield and infill sites playing an important role. It is therefore considered that the provision of apartments at the Collins Avenue 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 held two public information sessions on the 26th September 2023 and on 22nd February 2024. On both occasions the consultations were well attended by residents in the community. The team presented designs at a point in time during design development. Feedback from local area representatives and residents were received via email over several months. Dublin City Council also responded to the concerns via email.

The Design Team reviewed all correspondence and considered every submission received, which informed the proposal on key matters across layout, permeability, tenure, infrastructure, car parking, trees, boundaries, site constraints and the requirements of the City Development Plan 2022 to 2028. Key issues raised by residents in their submission and at the public consultation events are summarised and responded to below:

Residents requested that the proposed permeability link between the site and the open space serving Crestfield Estate be removed.

Response:

Following discussions with members of the public, the proposed pedestrian link between the site and the open space serving Crestfield Estate was removed in the final design iteration having regard to the concerns expressed by residents.

Residents raised concern on the number of social housing project currently being undertaken in the area and queried the rationale to ignore a report prepared by Dublin City Council in 2018 which cited that due to the concentration of social housing in the area, the site is more appropriate for private residential development. The residents requested clarification on the report number, date and legislative provision under which DCC changed their outlook.

Response:

The report prepared by Dublin City Council in 2018 is acknowledged, but given the period of time that has passed since its preparation, the position taken by DCC requires reconsideration, particularly in the context of the evolved planning and housing policy landscape since 2018 and the release of the 2022 Census results. As shown in section 4.2 of this report, data extracted from the CSO indicates that the housing stock is for the vast majority, privately owned (with or without mortgage) (69%). If those who rent from a private landlord are considered as well, this means that over 88% of the housing stock in the area is either privately owned or rented. In terms of stock rented from Local Authority or rented from a voluntary body this equates to 5.9% of the study area. The proposed development of 106 social homes will help alleviate the dominance of private housing in the area.

Even taken cumulatively with other social housing development in the area, including permitted and proposed developments raised by residents in their submission, which included 40% of social housing currently being constructed at Oscar Traynor Road, 83 social housing units at the former Dublin Port Tunnel Compound site, this subject application and a proposal for 91 social housing units for senior citizens located at the Holy Child

Church car park site, there will not be a dominance of social housing in the area with shares as part of the overall housing mix remaining relatively modest. Including the proposed and permitted development within the overall housing statistics for the study area, this does not substantially alter the provision of social housing in the area, increasing social housing from 288 to 909 within the area which would equate to a total of c.17% of social housing stock in the study area. It is strongly considered that the proposed development in combination with those permitted will not lead to an overconcentration of social housing in this area.

Residents raised concern in relation to the scale of Block A, B and C and their proximity to the boundary wall of existing properties on Collins Extension and Crestfield,

Response:

The proposed separation distance at the proposed scheme have been designed in excess of the standards set out in the Dublin City Council Development Plan, 2022-28 (s.15.9.17) and the Sustainable Residential Development and Compact Settlements: Guidelines for planning authorities, 2024 (SPPR 1 - Separation Distances). In addition, across the development site a comprehensive landscaping strategy is proposed which includes boundary planting.

The orientation of Block A, at an angle will further mitigate the potential for direct overlooking of rear gardens.

Block B has been carefully located away from the boundary to the houses to Crestfield Close, separated by residential access road, landscaping strip and also a Public Open Space triangle area. It is considered that the separation distance to the boundary (16 m) and further again to the houses (39m) is appropriate in this location and well in excess of minimum requirements.

The scale and height of Block C has been carefully designed in respect of the characteristics of this part of the site. The height of the building relative to the Crestfield Park open space improves passive surveillance of that area and is considered appropriate. The block is positioned approx. 18m relative to the side elevation of 43 Crestfield Close and has no impact on its residential amenity.

Residents stated that the overall height of the development requires reconsideration.

Response:

The height of the buildings are in accordance with the Dublin City Council Development Plan 2022-28 and the Urban Development and Building Heights – Guidelines for Planning Authorities (2018). The design of the block has been specifically composed to step down in scale where it is closest to boundaries. The 6 storey height is necessary to ensure that the development achieves the minimum density allowable for the site.

Residents requested that the number of balconies facing on to existing properties need to be reduced/eliminated.

Response:

It is a requirement of the Dublin City Council Development Plan 2022-28 and Sustainable Urban Housing: Design Standards for New Apartments (2023) that all residential units are provided with private open space. The orientation of the block ensures there is not direct back to back balconies adjoining relevant boundaries.

The location of the balconies has been carefully considered by the architects having regard to the internal layout and building structures, to achieve a balance in the location of private amenity spaces and balconies. South facing balconies provide for a more desirable level of residential amenity for the apartments.

Residents requested that the sound barrier between the new development and Crestfield Close boundary walls be improved.

Response:

A sound barrier would only be utilised for sound attenuation to a major distributor road or motorways etc. The proposed development is for infill residential development with minor access for domestic use only.

The current depot site is not greenfield in nature and has regular activity. It is unlikely that the infill residential scheme will cause additional noise and privacy issues for residents or devalue property.

Residents noted that the trees located within the development site may cause problems.

Response:

A tree survey has been undertaken as part of the site assessment. Trees suitable for removal have been identified and planting will be replaced and augmented as part of the landscape plan.

The proposed parking provision at the site is considered inadequate. Further, residents requested that the number of housing units be decreased and this would in turn reduce the number of parking spaces required in the new development.

Response:

The Dublin City Council Development Plan, 2022-28 and the Sustainable Residential Development and Compact Settlements: Guidelines for planning authorities, 2024 (SPPR 3) requires that in city centres and urban neighbourhoods of the five cities car-parking provision should be minimised, substantially reduced or wholly eliminated. Any parking issues arising from DCU is outside the scope of this application.

Residents raised concern in relation to traffic management in the area. Residents requested that a full traffic survey and a traffic management plan be developed, and they also requested for the findings of these reports to be shared with, discussed with and agreed with local residents prior to development commencing.

Response:

The planning application is accompanied by a Traffic and Mobility Management Plan which includes details of the traffic survey undertaken and traffic management plan. The approach is to minimise car use and promote active travel and use of public transport. It is not anticipated the scheme will worsen traffic issues in the area.

Residents stated that current public drainage system in the area, both foul and surface water, are causing problems on an ongoing basis. They raised concerns of the existing capacity to accommodate a development of this size.

Response:

The development includes a comprehensive drainage and infrastructure proposals prepared by Malone O'Regan. Details of these proposals are also included in this report.

Residents requested that a comprehensive lighting plan be submitted as part of the application.

Response:

The development application is accompanied by a comprehensive lighting proposal. Please refer to drawing no. SHB4-CAD-DR-SMK-ME-P3-6033 - PUBLIC LIGHTING(P02) and the accompanying Lighting Report.

Concerns was raised by residents that the primary schools located in the vicinity of the site were oversubscribed.

Response:

A Social Infrastructure Assessment (SIA) has been prepared by MacCabe Durney Barnes to accompany the application. This includes surveys and analysis of school capacity. The SIA identified existing capacity within the schools located in the area, which can cater for the demand generated by the proposed development. In addition, the Department of Education are responsible for the ongoing monitoring of admissions to primary and secondary schools. As cited in the Department of Education's submission to the draft Development Plan 2022-2028 consultation, school accommodation requirements across the City will continue to be kept under review and that department will work closely with DCC to meet the provisions of new schools and the redevelopment/ extension of existing schools.

Residents raised concern on whether the existing medical services can accommodate any future demand that may be generated from the proposed development.

Response:

The provision of medical services are the responsibility of the HSE. Further information on medical services serving the area can be found in the accompanying Social Infrastructure Audit.

Residents requested that the development cater for senior citizens only.

Response:

Owing to the unit requirements derived from the housing waiting lists, cumulatively there is a 46.9% requirement of 1-bed unit and a further 34.6% requirement for 2-bed units. The proposed housing unit mix reflects the current demand with 49 no. one bed units, 37 no. 2 bed units and 20 no. 3 bed units. The proposed 1 bed units will be capable of accommodating senior citizens. It is also noted that there is a dedicated senior citizens proposal being pursued for planning, located at the Holy Child Church car park site proximate to this application site.

5. CONSIDERATION OF DESIGN

The proposed development has undergone an iterative design review process with key stakeholders including representatives from North Central Area Office, Housing Department and DCC technical teams in consultation with the Project Technical Advisors.

Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high-quality residential development, creating a sense of place for its residents whilst integrating into the existing built environment. The layout is particularly derived from the infill nature of the site. It has no main frontage, abuts a development site with a pending planning application and is surrounded on two sides by low rise housing units. The layout and design therefore sought to both utilise the site to its optimum capacity but also to preserve existing and future residential amenities.

Strong lines of existing trees are present along the boundaries within the application site. Approximately 60% of the southwest boundary to gardens to Collins Avenue has a dense line of Leyland Cypress (Evergreen) 11m to 12.5m in height. The entirety of southeastern boundary to the gardens Crestfield Close is a line of deciduous Hybrid Black Poplars (Deciduous) ranging from 7 to 17m in height. A significant line of Poplars trees exists outside of the application site along the northeast boundary to the green at Crestfield Close ranging in height from 14m to 22m. A further line of 6m to 11m high Sycamore and Ash occurs outside of the northeastern corner of site beyond the boundary to Shanowen Square. All trees surveyed have been identified as low-quality Category C or Category U recommended for removal.

The site's shape was also a major factor in the design, being highly irregular. One main access is proposed to follow the existing access point but with one spur toward the larger part of the development site. The design maintains a lower height where it has an interface with the houses facing Collins Avenue. The tallest element, the six storey building proposed to be located between the access road and the spur, block B, is located some distance away from existing and proposed buildings and will be at least 24m away the rear of the block proposed on the Shanowen site.

Importantly, the layout allows for the provision of a possible pedestrian link to the Shanowen business park, where the student accommodation SHD scheme is proposed. This reflects the provisions of the CDP.

The client brief had initially envisaged that the site could accommodate from 99 to 131 units. The proposed development falls within the range with 106 units and a mix which reflects social housing need in the area.

6. PROPOSED DEVELOPMENT

6.1 Project Description as per Public Notices

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

Notice is hereby given of the construction of 106 apartments on a site c.1.72 ha at the former bring centre and Dublin City Depot site accessed via Collins Avenue Extension and Collins Avenue, Whitehall, Dublin 9. The site is bound to the north by the Shanowen Business Estate and the Shanowen Hall and Shanowen Square, to the east by Crestfield Estate and Crestfield Park and Collins Avenue Extension Estate fronting Collins Avenue immediately adjoins the site to the west and south. Development at the site will consist of the following:

- The demolition of the existing office building, sheds, warehouses and garages and site clearance works.
- Three apartment blocks comprising a total of 106 residential units and 375 sqm of community, arts and cultural space.
 - Block A ranges from 3 to 6 storeys and consists of 50 no. residential units (22 no. 1 bed, 20 no. 2 bed and 8 no. 3 bed units) and 275 sqm of community, arts and cultural facilities at ground floor level.
 - Block B ranges from 4 to 6 storeys and consists of 38 no. residential units (17 no. 1 bed, 9 no. 2 bed and 12 no. 3 bed units) and 100 sqm of community, arts and cultural facilities at ground floor level.
 - Block C ranges from 4 to 5 storeys and consists of 18 no. residential units (10 no. 1 bed and 8 no. 2 bed units).
- 183 no. long-stay and 63 no. short-stay bicycle parking space, 57 no. car parking spaces and 5 no. motorcycle parking spaces.
- 1,925 sqm of public open space and 3,140 sqm of communal open space.
- One signalised vehicular access is proposed via Collins Avenue and Collins Avenue Extension.
- Provision of pedestrian and cyclist access at northern boundary to allow for future link via Shanowen Business Estate and the Shanowen Hall and Shanowen Square
- Boundary treatments and planting, public lighting, site drainage works, internal road surfacing and footpath, ESB meter rooms, stores, bin and cycle storage, plant rooms, landscaping; and
- All ancillary site services and development works above and below ground.



Figure 9: Proposed site layout (Source: Coady Architects)

In summary, the proposed development has been designed to provide high quality homes for a range of households from the 1-bed to the 3-bed. The design is cognisant of the existing and proposed residential uses in the immediate vicinity and of the constraints imposed by the surrounding structures. It will provide a net density of 65 uph, which is acceptable considering the irregular shape of the site and the need protect existing and planned residential amenities. The yellow dashed line illustrated in figure 9 indicates the Wad River which is a culverted stream on the site.

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	1.72 ha
No. of Residential Units (Apartments)	106 units (49 no. 1 bed, 37 no. 2 bed and 20 no. 3 bed)
Non-residential uses:	Total: 375 sqm (5%) of community, arts and cultural space <ul style="list-style-type: none"> • 275 sqm (3.7%) provided Ground Floor Block A • 100 sqm (1.3%) provided Ground Floor Block B

Development Parameters	Summary
Density	65 uph
Plot Ratio	0.66
Site Coverage	22%
Dual Aspect	56%
Car Parking Overall	57 spaces
Bicycle Parking	183 no. long stay and 63 no. short stay
Height	3 to 6 storeys
Public Open Space	1,925 sqm
Communal Open Space	3,140 sqm

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

Table 2: Overall Breakdown of Units

Unit Type	1 bed Apartment	2 bed Apartment	3 bed Apartment	Total
No. of units	49	37	20	106
% of Apartments	46%	35%	19%	100%

6.3 Design Rationale

The design approach for the proposed development includes:

The scale and locational characteristics of the subject site provide a unique opportunity for a sustainable, higher density residential development in a uniquely attractive setting with a mature landscape. The part 8 site was the former bring centre with access via Collins Avenue and Collins Avenue Extension. Since the centres closure in 2023 with the relocation of the centre to Ballymun, the site has remained vacant. The proposal entails the demolition of remaining structures on site to facilitate the development of residential units, community, arts and cultural space and public open space.

The irregular infill nature of the site has steered the design approach towards development on the site and the visual appearance of the development has been carefully considered, particularly the scale, massing and context within its setting. It has no main frontage, abuts a development site with a pending planning application and is surrounded on two sides by low rise housing units. 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 development site includes mature trees along the southern and eastern boundary of the site, a key element of the design included the retention and additional planting proposed, and this will ensure that the proposed

development settles into the landscape and that the residential amenities of adjoining dwellings will be retained and reinforced. A surface water culvert of the River Wad runs parallel to the northern boundary. A 5m wayleave for the culvert has been provided for in the site layout in line with Dublin City Council requirements.

The proposed development is supported by a significant landscaping proposal which ensures the delivery of high-quality open space, including the retention of mature trees and local biodiversity enhancement measures and the delivery of a SuDs scheme are also proposed.

Communal open space for the future residents is provided in landscaped courtyards to the rear of the blocks, enclosed primarily by the building forms supplemented by railings being brought to the site boundaries. The courtyards are accessed by residents through the communal stair cores with maintenance access provided by gates in the railings.

The public, communal, and private realms are all very clearly defined within the proposed development. This has largely been achieved by using the buildings to define the boundaries between each. Where this is not possible (such as where the private spaces of ground floor terraces meet the public realm, or communal space), buffer planting and fencing will define boundaries and ensure privacy is maintained.

Three separate apartment buildings are set back from the wayleave and existing trees to the boundaries providing separation from the adjoining properties. Two cranked apartment blocks A & B, in the larger western half of the site frame a central public open space accessed directly from the existing entrance. A modest freestanding Block C sits in the smaller northeastern corner of the site. The design maintains a lower height where it has an interface with the houses facing Collins Avenue as well as Crestfield Close. The tallest element, the six storey building proposed to be located between the access road and the spur, Block B, is located some distance away from existing and proposed buildings. The setbacks of the proposed buildings to the existing context exceed the minimum standards of 16m.

The internal road network, supporting surface car parking and emergency vehicular access, has been laid out to avoid the root protection areas of the retained trees and utilise the sterile zone of the wayleave.

Existing access to the site has been retained with junction improvements proposed as well as pedestrian under this application. In addition, the proposed development facilitates a pedestrian and cyclist link across the site towards the northern boundary which interfaces with the Shanowen Business Park area.

The Development Plan connectivity objective is achieved through the provision of a generous 3m wide pedestrian/cycle route running parallel to the western side of the central public open space.

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 high quality homes in close in close proximity of public transport and public facilities. The proposed layout caters for communal and public open space. It includes 375 sqm of community, arts and cultural space which will serve both prospective and existing residents to allow for the creation a cohesive community in the development.

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

Given the location between two significant public transport corridor and near a range of public facilities, the provision of 106 homes at the Collins Avenue 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 33 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 65 uph with heights ranging from 3 to 6 storeys. The proposed height is aligned with recently permitted heights in the area. The development is an infill scheme on a brownfield site. 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 Collins Avenue Bring Centre 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 ₂ eq)	2030 KPI	2030 abatement (vs 2018 MtCO ₂ eq)	2031-2035
Standards and Regulations	All new dwellings designed and constructed to NZEB standard. 170,000 new dwellings using a heat pump.	0.3	All new dwellings designed and constructed to NZEB standard. 280,000 new dwellings using a heat pump.	0.4	Minimum Energy Performance Standards for all dwellings

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

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

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

- The provision of medium residential density in close proximity to existing community facilities and amenities and in accordance with the NPF providing for compact growth.
- The application site is within walking and cycling distance to bus and proposed Metro station 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 Guidelines for Planning Authorities (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Design Manual for Urban Roads and Street (2019)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)
- Urban Development and Building Heights – Guidelines for Planning Authorities (2018)
- Design Manual for Quality Housing (2022)

7.2.1 Guidelines for Planning Authorities on Childcare Facilities (2001)

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

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

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). The provision of 106 units, 51 of which are one-bed units, means that the development falls below the 75-unit threshold set out by the Childcare Facilities Guidelines for Planning Authorities (2001).

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. The audit has identified 17 facilities within the vicinity of the site with 19 spaces available. It also found one permitted facility at the site of the SHD permitted on the compound of the Dublin Port Tunnel. The audit estimated that the development would generate a potential demand for 14 spaces. Having regard to the proposed development, demographics and the existing network of facilities established proximate to the site. It is considered that the demand generated from the proposed development can be absorbed in the existing childcare facilities.

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 underused since the relocation of the bring centre and depot functions.

The proposed development has been designed to be cognisant of prevailing height and surrounding residential amenities. All areas of open space (public and communal) are well designed and sheltered from the road, allowing for safe enjoyment by users. These areas are also located at locations which doubles up as buffers between existing and proposed units, therefore allowing to maintain adequate levels of privacy. The site was formerly used as a bring centre and DCC depot site therefore generates car movements. The proposed development will change the nature and outlook of the site to be more in harmony with the surrounding area. All units have been designed to meet the highest level of energy efficiency. The units will be constructed to the highest degree of air tightness to a possible value of 3 m³/m²/hr1. The development will use energy efficient

technologies to reduce its reliance on fuel and electricity demand. 56% of the apartments are dual aspect and no apartments are single aspect north facing. 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 already reiterated that 32% 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 vehicular access and junction area on Collins Avenue and Collins Avenue Extension. This equates to a net site area of 1.63 ha and results in a net site area of 65 uph. With a Net Residential Density of 65 dph in an urban neighbourhood, the proposed development is in accordance with the Guidelines.

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

The proposed density is 65 uph. The density is 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. A Quality Audit Report has been produced by ORS, which includes a Road Safety Audit, Cycle Audit, and an Accessibility Audit. The Quality Audit assessed the proposed layouts supplied by the Design Team and made a number of recommendations in line with guidance such as DMURS.

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

Policy and Objective 4.2

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

Chapter 4.4 identifies the core principles of Quality Urban design and Placemaking, including Sustainable and Efficient Movement, Mix and Distribution of Uses, Green and Blue Infrastructure and Responsive Built Form that are required when creating places of high quality and distinct identity. Appendix D sets out a ‘Design Checklist’ which should be incorporated in new residential development as 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 3: Summary of Design Statement Response to the Specific Criteria

No.	Topic	Response
1	Sustainable and Efficient Movement	
(i)	permeable and legible network of streets and spaces within the site	The proposed Part 8 site is a landlocked infill brownfield site with one existing access point to the site. The site has no road frontage and is bound by existing and proposed residential development and open space. As a result, it is proposed to retain and improve the existing access point to the site via Collins Avenue and Collins Avenue Extension. Within the site, internal streets have been proposed to cater for minimal vehicular on-site traffic. The building form and layout has been developed to optimise the irregular nature of the site while also creating a legible network of streets and spaces within the site. As part of the Development Plan the zoning map of the subject site also indicates a ‘roads, street and bridge schemes’ which is discussed in further

No.	Topic	Response
		<p>sections of this report on transport. In summary, to comply with the zoning requirements, provision of a cyclist and pedestrian link across the site has been proposed with provision made for the future connection towards Shanowen Road.</p> <p>In addition, the site avails of high-quality existing and planned public transport connectivity with a number of Dublin Bus routes operating services along Collins Avenue and the surrounding area. In addition, the site is located c.600m from the proposed Collins Avenue Metro Station and the permitted BusConnects upgrade works along Ballymun Road.</p>
(ii)	connections with and between established communities, services and other uses	<p>The proposed scheme is located within a predominately residential and neighbourhood services centre with the exception of DCU located south of the site on Collins Avenue. The proposed development accommodates the provision of a future link between Collins Avenue and Shanowen Road, which would improve the connectivity with and between established communities.</p> <p>The accompanying Social Infrastructure Audit has identified a wide array of community services and amenities located in the vicinity of the site. The site is located within walking and cycling distances to educational, community, leisure, sporting and public open spaces, healthcare and retail services and therefore is ideally placed to achieve the principles of the 15 minute city envisaged in the Dublin City Development Plan.</p> <p>The application site is ideally located within an established area that can serve the needs of perspective residents.</p>
(iii)	streets designed in accordance with DMURS	<p>In line with National Policy, the development objectives for the proposed site is to provide for higher-density infill development, in an urban location with good transport links. This helps to fulfil one of the primary objectives of DMURs, which is to encourage more sustainable travel, with pedestrians at the top of the user hierarchy, then cyclists, public transport and finally, private vehicles.</p> <p>As the site is an infill development, with a single entrance and no frontage to a public roadway, there are no new vehicular through routes proposed. The north south link in compliance with the Development Plan connectivity objective for Collins Avenue to Shanowen Road is pedestrian/cycle only.</p> <p>Full details for compliance with DMURS in the design of the layout of the internal road network are contained in the engineering reports included in this application.</p>
(iv)	quantum of parking been minimised	<p>The site is located within parking zone 2 due to its location along key transport routes. Owing to the site's proximity to public transport nodes and access to a range of services and amenities in nearby neighbourhood centres as well as its location to the city centre, reduced parking standards have been applied at the site. The maximum parking standards under zone 2 for houses, apartments/ duplexes is 1 per dwelling.</p> <p>Having regard to the location and the urban infill nature of the site, it is considered appropriate that the car parking standards are reduced in order to deliver upon key policy objectives of the development plan including consolidation of the built-up envelope, compact growth and the 15 minute city. The proposal includes 57 no. spaces which equates to a parking ratio of 0.5 at the site.</p>

No.	Topic	Response
		Surface carparking is proposed along the new internal road network to serve each block with accessible spaces as required by Technical Guidance Document Part M
2	Mix of Land Uses (Vibrant Centres and Communities)	
(i)	mix and intensity of land uses appropriate to the site	<p>The primary brief for the site was derived from the applicable zoning on the site of Z1 Sustainable Residential Neighbourhoods'. Residential is permitted under Z1. The zoning objective is to protect, provide and improve residential amenities. Given the site is in excess of 10,000 sqm, it is a policy objective of the Development Plan under CUO25 to include 5% provision of community, arts and cultural facilities at the site. In this regard, 375.3 sqm of internal community, arts and cultural space has been proposed across block A and B.</p> <p>In terms of density, the site is located in an area classed as outer residential area according to the Development Plan and therefore, the applicable density of the site is 60-120 uph. The Development Plan requirements for a minimum 60uph will result in a significantly denser development than that of adjacent housing on Collins Avenue and Crestfield Close. No explicit Development Plan parameters are placed on this site for height but achieving the density necessitates proposed buildings of scale and height similar to the Shanowen Road existing apartment and student housing complexes. The proposed net density is 65 uph and therefore accords with the density provisions of the development plan.</p>
(ii)	diverse and varied range of housing types	<p>The proposed development includes 1, 2 and 3 bed apartment units. The proposed unit mix has been informed by the DCC housing Waiting List for the area. The provision of social housing units on this site will facilitate diversity in tenure and facilitate housing mix in this part of the City. The general area of Whitehall is largely dominated by semi-detached and terraced housing. Data extracted from the 2022 census shows that 85.9% of the residential stock in the area² consists of houses. The stock is also, for the vast majority, privately owned (with or without mortgage) (69%). If those who rent from a private landlord are considered as well, this means that over 88% of the housing stock in the area is either privately owned or rented. In terms of stock rented from Local Authority or rented from a voluntary body this equates to 5.9% of the study area. The proposed development of 106 social homes will help alleviate the dominance of private housing in the area. Even taken cumulatively with other social housing development in the area, including that further east at the Dublin Port Tunnel Compound, there will not be a dominance of social housing in the area with shares as part of the overall housing mix remaining relatively modest.</p> <p>Cumulatively, 46.9% of the households require a 1-bed unit, and a further 34.6% require a 2-bed unit. The general area as described in the previous paragraphs is largely dominated by 3-bed type units. The existing housing stock consists of 47.9% 3-bed units and only 4.6% one-bed, clearly showing a mismatch between demand and supply. The proposed development includes 59 no. 1-bed or 45% of the overall mix. This will help alleviate demand in the area.</p> <p>Furthermore, in compliance with DCCDP, in excess of 25% of the apartments have been designed in accordance with Universal Design Principles</p>
(iii)	support the regeneration and revitalisation of	The subject development is regenerative for the wider community, in that it utilises a current brownfield site, and serves to provide housing led, in-demand facilities. Since the relocation of the Dublin City services from the site, such as the bring centre to the new purpose built facility in Ballymun, the site has remained vacant. The proposal

² Including the Whitehall A, B and C and Beaumont A electoral divisions

No.	Topic	Response
	an existing centre or neighbourhood	is a supportive and positive contribution to the regeneration and revitalisation of the Whitehall area. The delivery of 375 sqm of community, arts and cultural space and 1,925 sqm of public open space will also positively contribute to the established community and social infrastructure network in the area.
(iv)	enhancement of the public realm	<p>The site has no main frontage with the only links to the public realm being the existing vehicular entrance and the secure boundary to the open green at Crestfield Close. The infill nature of the development and the existing context presents limited opportunities to integrate with the existing public realm. Within the site, a key priority of the design process has been to deliver a high quality landscaped public realm through the retention of the existing mature trees located along the boundary of the site and in the delivery of the public open space. Block A and B naturally define and provide passive surveillance to the centrally located public open space and the cyclist and pedestrian link, with allowance made for a future connection between the site and the adjoining Shanowen Business Estate area located to the north of the site.</p> <p>The proposed development will also improve the existing pedestrian environment at the access to the site via Collins Avenue. Having regard to irregular nature of the site, it is considered that the proposed enhancement to the public realm is appropriate.</p>
3		Green and Blue Infrastructure (Open Space, Landscape and Heritage)
(i)	positively responded to natural features & landscape character	<p>Strong lines of existing trees are present along the boundaries within the application site. Approximately 60% of the southwest boundary to gardens to Collins Avenue has a dense line of Leyland Cypress (Evergreen) 11m to 12.5m in height. The entirety of southeastern boundary to the gardens Crestfield Close is a line of deciduous Hybrid Black Poplars (Deciduous) ranging from 7 to 17m in height. A significant line of Poplars trees exists outside of the application site along the northeast boundary to the green at Crestfield Close ranging in height from 14m to 22m. A further line of 6m to 11m high Sycamore and Ash occurs outside of the northeastern corner of site beyond the boundary to Shanowen Square. All trees surveyed have been identified as low-quality Category C or Category U recommended for removal.</p> <p>The landscape character of the linear open space along the southern boundary will be passive, focusing on biodiversity and passive amenity. Existing trees and hedgerows along the boundary will be protected, retained, and managed to maximise the visual softening of the proposed scheme and to maintain and improve site's biodiversity.</p> <p>The existing trees and hedgerow will be cut back and reinforced with additional screen planting with the selection of proposed evergreen and deciduous trees which will provide a good screening and seasonal interest through the whole year.</p> <p>Native and naturalised tree species are to be planted within the amenity space to increase opportunities for native wildlife. The existing trees and hedgerows are to be protected where possible in order to preserve the identity of the site and reduce the impact of the development on the existing biodiversity.</p> <p>As part of the Landscape Design Report prepared by Mitchell + Associates, a number of biodiversity enhancement measures are detailed, including measures on native hedgerows and trees and pollinator friendly grasslands, biodiversity enhancement for fauna, bats and mammals. Please refer to this report for further information.</p>

No.	Topic	Response
(ii)	a complementary and interconnected range of open spaces, corridors and planted/landscaped areas	<p>The landscaping and biodiversity proposals are described in detail in the Landscape Report from Mitchell & Associates.</p> <p>This public open space will allow for east west permeability as well as connections to the north and south. The extensive inclusion of the planted swales along the road at the east and west side of the public open space provide a buffer zone for the pedestrians. Together with the selection of native and pollinator friendly trees swale features will provide for a particular habitat and enhance the site’s biodiversity.</p>
(iii)	public open spaces universally accessible and designed to cater for a range of active and passive recreational uses	<p>The landscape structure of the proposed residential development adopts the open space strategy of the Landscape Masterplan which provides for a varied, accessible and permeable open space network for community use that as it matures will become a significant resource.</p> <p>The open space is providing the opportunities for informal recreation and active play for smaller children with the traditional and natural play equipment chosen for individual and group play; social interaction, imaginative play and climbing and sliding movements. The flexible grass and meadow space with mounding, tree planting will allow for kick-about areas and will inspire natural play.</p> <p>South facing seating along the play space is provided to allow parents, guardians and residents passive supervision, while the seating at the north-east corner of the open space is provided for relaxation and social interactions. Seating will be robust and will utilise composite timber seating tops, back and arm rests for the comfort.</p>
(iv)	integrated nature-based solutions for the management of urban drainage	<p>The proposed development will be designed in accordance with the principles of Sustainable Drainage Systems (SuDS) as embodied in the recommendations of the Greater Dublin Strategic Drainage Study (GSDSDS) and will significantly reduce run-off rates and improve storm water quality discharging to the public storm water system. A wide range of SuDS measures are proposed across the site to maximise interception and treatment, which are detailed in the Engineering Report prepared by Malone O’Regan and submitted under separate cover, these measures include:</p> <ul style="list-style-type: none"> • Bioretention swales are proposed in areas beside roads and green spaces within the site. • Tree pits in suitable areas beside the development roads and car parking • Green and blue roofs for flat roofs above apartment buildings. • Rain gardens, particularly in green spaces beside roads • Permeable paving in homezones and car parking spaces • Detention Basins in the communal open spaces available. <p>Further details of the principal SuDS features proposed for this development are provided in the Engineering Report prepared by Malone O’Regan.</p>
4	Responsive Built Form	
(i)	coherent and legible urban structure in terms of block layouts and building heights	<p>The classification of the site as an outer residential area necessitates a density in excess of 60 uph, which will result in a denser development than that of the adjacent housing located along Collins Avenue or Crestfield Close, and would instead follow a similar scale of development to Shanowen Road. This should be seen as an opportunity, as variety in building height is an important component in helping to achieve a sense of place and create an attractive built environment. The proposed buildings must be considered against the scale not just of the adjoining 2 storey</p>

No.	Topic	Response
		<p>dwelling along Collins Avenue and Crestfield Close but also the immediate context to the residential development along Shanowen Road and development under construction on Collins Avenue. The building form, massing and heights have been carefully considered to protect the existing residential amenity of adjoining properties. Building heights at the site range from 3 to 6 storeys.</p> <p>Block A to the west of the site is L-shaped in plan set obliquely to the existing rear gardens on Collins Avenue. To ensure adequate separation to the gardens the northern wing has been kept narrow with south facing apartments off two cores that run the depth of the wing. The eastern wing, set almost perpendicular to the boundary is deeper with east and west facing apartments off a central spine corridor. Block A is 3 storeys in the proximity of the boundary and gardens on Collins Avenue, rising then to 6 storeys at the central node of the site where it addresses the public open space and will relate to the potential development to the north.</p> <p>Block B sits in the centre of the site to the north of the central public open space and outside of the zone of the wayleave. Similar to Block A, it cranks in plan and changes in depth to respond to the site constraints and reduce the impact on the existing residential amenity. Block B is separated from the boundary to Crestfield Close by existing trees and a proposed roadway, paths and buffer landscaping. Parallel to the boundary, the building is 4 storeys. As the block cranks to address the public open space it rises to 6 storeys, creating a mutual harmonious relationship with Block A.</p> <p>Block C is a freestanding building sitting in the triangular area in the northeastern corner of the site. Its footprint is dictated by the wayleave and the root protection areas of the existing trees. It's a smaller simpler structure than Blocks A and B with apartments arranged around a single central core. The building form responds to the building line along Crestfield Close and addresses the existing open green space to the southeast. Block C is 4 storeys facing Milner Square stepping up to 5 storeys to address the adjoining green at Crestfield Close.</p> <p>A sunlight and daylight study has been undertaken by Digital Dimensions and accompanies this application.</p>
(ii)	buildings address streets and spaces	<p>The proposed scheme will create a new internal road network to serve access to Block A, B and C. The site layout allows for good passive surveillance with all streets, open spaces and play areas overlooked by multiple apartment windows and balconies, providing for strong passive surveillance. The central public open space is accessible to both the new residents, and the wider existing community. The relationship of the Community/Cultural/Art facilities and the connectivity route through the site to the north have been carefully considered to activate the space.</p>
(iii)	layout, scale and design features of new development respond to prevailing development patterns (where relevant)	<p>Much consideration has been given to the layout and design of the scheme with a particular focus on providing a high-quality residential development, creating a sense of place for its residents whilst integrating into the existing built environment. The layout is particularly derived from the infill nature of the site. It has no main frontage, abuts a development site with a pending planning application and is surrounded on two sides by low rise housing units. Along Shanowen Road, development is of a greater height and scale. The layout and design therefore sought to both utilise the site to its optimum capacity but also to preserve existing and future residential amenities. There are a number of trees and hedgerows on the perimeter of the site, which currently shield its use from the residential units bounding the site to the south and east. These are being retained.</p>

No.	Topic	Response
		<p>The site's shape was also a major factor in the design, being highly irregular. One main access is proposed to follow the existing access point but with one spur toward the larger part of the development site. The design maintains a lower height where it has an interface with the houses facing Collins Avenue. The tallest elements of Block A and B are located some distance away from existing and proposed buildings and will be at least 24m away from the rear of the block proposed on the Shanowen site.</p> <p>Importantly, the layout allows for the provision of a possible pedestrian and cyclist link to the Shanowen business park, where the student accommodation SHD scheme is proposed. This reflects the provisions of the CDP.</p> <p>A full analysis of daylight and sunlight impact has also been undertaken to determine the impact of the subject development on the surrounding buildings. There are no negative impacts, and full details are included elsewhere as part of this planning application.</p>
(iv)	coherent architectural and urban design strategy	<p>A coherent architectural design strategy has been delivered with cognisance to the sites surrounding characteristics, which will make a positive contribution to the regeneration and revitalisation of the former bring centre site at Collins Avenue. The completion of the subject site will deliver greater variety in housing tenure and typology to the Whitehall area.</p> <p>Architecturally, the development aims to be both distinctive and subservient, Within the wider context, the subject development will be distinctive and will deliver an increased urban scale as a contrast to the uniform, low rise surroundings along Collins Avenue and Crestfield Close but also integrate with proposed and existing development along Shanowen Road. This will help to achieve a sense of place, and aid orientation. The proposal will also create a new internal road layout and building forms within the site and provides provision for pedestrian and cyclist link between Collins Avenue towards the Shanowen Road. The proposed public open space and pedestrian and cyclist link will also benefit from passive surveillance from Block A and B and positively contribute to the urban design strategy for the area.</p>

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

SPPR No.	Summary	Development Compliance
SPPR 1	<p>Separation Distances</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</p>	<p>The proposed development does not give rise to any separation distance between opposing windows of less than 16m. The proposed development complies with SPPR1.</p>

SPPR No.	Summary	Development Compliance
	<p>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>SPPR 3</p>	<p>Minimum Private Open Space Standards for Houses</p> <p>Proposals for new houses meet the following minimum private open space standards: 1 bed house 20 sq.m; 2 bed house 30 sq.m; 3 bed house 40 sq.m; 4 bed + house 50 sq.m</p>	<p>Apartment units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).</p>
<p>SPPR 3</p>	<p>Car Parking</p> <p>In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling</p>	<p>A total of 57 car parking spaces have been proposed. This entails a ratio of 0.5 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. The proposed development complies with SPPR3.</p>
<p>SPPR 4</p>	<p>Cycle Parking and Storage</p> <p>Safe and secure cycle storage facilities to meet the needs of residents and visitors. A general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided.</p>	<p>A total of 246 cycle parking spaces are provided (183 long stay and 63 no. short stay). This is accordance with the Dublin City Development Plan standards and is appropriate to meet the needs of residents and visitors for the profile of this future resident community and community, arts and cultural use. The proposed development is also in accordance with SPPR 4 which requires a general minimum standard of 1 cycle storage space per bedroom and visitor cycle parking is also provided.</p>

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 11.7% Public Open Space provision (1,924.89 sqm.) as well as 3,140 sqm. Communal Open Space and is therefore in accordance with the Guidelines’ Policy Objective. Please refer to drawing no. SHB4-CAD-DR-COA-AR-P3- 5504 Proposed Open Space prepared by Coady Architects for an illustration of the defined public open space and communal open space proposed as part of this application.

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

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

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

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

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

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
SPPR 1	Mix of units to include: - Up to 50% one-bed or studio type units; - No more that 20-25% of the total proposed development as studios; - No minimum requirements for 3-bed.	The proposed development includes 106 units, of which 49 are 1-bed (46%), 37 are 2-bed (35%) and 20 are 3-bed (or 19%). On this basis, the development complies.

SPPR No.	Summary	Development Compliance
	CDP may specify a mix for apartments subject to a Housing Need and Demand Assessment.	
SPPR 2	Not applicable to the subject scheme	Not applicable
SPPR 3	<p>Minimum Apartment Floor Areas</p> <ul style="list-style-type: none"> • Studio apartment (1 person) - 37 sq.m • 1-bedroom apartment (2 persons) - 45 sq.m • 2-bedroom apartment (3 persons) 63 sq.m • 2-bedroom apartment (4 persons) 73 sqm • 3-bedroom apartment (5 persons) 90 sq.m <p>The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard, by a minimum of 10%</p>	<p>Please refer to the schedule of accommodation and Housing Quality Assessment (HQA) and which demonstrates compliance.</p> <p>All units meet the floor area requirement 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>
SPPR 4	<p>Dual Aspect</p> <p>(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.</p> <p>(ii) (ii) and (iii) do not apply.</p>	56% of the apartment units are dual aspects.
SPPR 5	<p>Floor to ceiling heights</p> <p>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.</p>	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
SPPR 6	<p>Apartments per core</p> <p>A maximum of 12 apartments per floor per core may be provided in apartment schemes.</p>	The proposed development complies with SPPR6 by proposing 5 units per core.

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.

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

Table 4: Minimum Requirements for communal amenity space

Unit types	Sqm required	No. of Units	Total required (Sqm)
1-bed	5	49	245
2-bed (3 persons)	6	0	0
2-bed (4 persons)	7	37	259
3-bed	9	20	180
Total		106	684

The proposal includes c. 3,140 sqm of communal open space. The proposed development therefore exceeds the minimum 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.

Play areas

The Apartment Guidelines 2023 indicate minimum requirements for play areas of schemes of a certain sizes. The proposed development includes 49 no. 1- bed units, 37 no. 2-bed and 20 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 57. A small play area has been provided within the communal open space to Block A. Furthermore, formal play space of 100 sq. meters is proposed within the public open space. This formal secured play space will serve ages 0-6 yrs. and will be inclusive for all residents.

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 183 no. long-stay and 53 no. short stay spaces to serve the development.

183 no. long-stay cycle parking spaces are provided. These are sheltered and located in dedicated secure stores inside each of the buildings.

In relation to short stay cycle parking, the guidelines would give rise to a requirement of 53 spaces. The proposed development includes 63 no. 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. The proposal includes community, arts and cultural space and in accordance with the Development Plan 10 no. short stay spaces have been provided.

Car Parking

The Design Standards for New Apartments - Guidelines for Planning Authorities state that '*the default policy is for car parking provision to be minimised substantially reduced or wholly eliminated in certain circumstances*'. This policy is applicable in 'highly accessible area such as in or adjoining city cores or at the confluence of public transport systems such rail and bus stations located in close proximity'. The site, being located in a central and/or accessible urban location, avails of lower parking standards. This accords with National and local policy which seeks to minimise, reduce and wholly eliminate car parking in cities and urban neighbourhoods of the five cities.

The site proposed for development under this Part 8 application would qualify as one such central/and or accessible urban location. Car parking standards set out in the DCC Plan of maximum 1 space per unit for development in Parking Zone 2. 57 no. car parking spaces are provided within the site, which equates to a car parking ratio of 0.5.

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.

Content of Planning Applications

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

1. A Housing Quality Assessment (HQA) accompanies this part 8 application. It include compliance with the 10% additional space compliance and details of proposed private amenity, storage space and aspect.
2. A daylight and sunlight analysis report by Digital Dimensions is provided. It reviews level of natural light in the proposed development. This report has regard to the provisions of 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 report concludes:

“There will be minimal reduction to the daylight or sunlight availability of the adjacent properties and any impact will be negligible. The proposed development meets the recommendations of the BRE guidelines BR209:2022 (third edition). Overall the design team worked in response to the context to ensure the proposed development performed with regards to achieving the best possible daylight and sunlight quality. All apartments meet the minimum standard for daylight provision as per BS EN 17037:2018+A1:2021 as referred to in the BRE guidelines BR209:2022 (third edition). The majority of the apartment units achieve daylight provision as set out in IS EN 17038:2018.”

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 within the permissible envelopes of the Dublin City Development Plan. It also allows for higher density.

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

Table 5: Building Height Guidelines SPPRs

SPPR	Summary	Application of Consistency
SPPR 1	Planning Authorities are responsible for identifying appropriate locations for building heights in their statutory plans and that no blanket 'numerical' height shall be applied.	This is the responsibility of Dublin City Council. There is no numerical height applicable for the subject site. It is noted under that during the lifetime of the Development Plan, a Local Area Plan and/ or Village Improvement Plans for Santry/ Whitehall will be prepared.
SPPR 2	In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy.	This is the responsibility of the Planning Authority. The site is zoned Sustainable Residential Neighbourhoods under the Development Plan and capable of catering for the proposed community, arts and cultural spaces. Thus, the proposed development provides for the appropriate urban development of the area, to deliver compact growth on an existing vacant brownfield site.

SPPR	Summary	Application of Consistency
SPPR 3	Development Management Criteria are set out. Where an applicant sets out how a development proposal complies with the criteria and the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and these guidelines the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise In planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:	<p>The proposed development ranges in heights between 3-6 storeys in height. Having regard to the prevailing urban context of the site, the proposed height is considered to be an appropriate scale to achieve the required density on the site and deliver compact growth on this brownfield infill site.</p> <p>Table 12 below outlines how the proposed development complies with the development management criteria listed in section 3 of the guidance.</p>
SPPR 4	Not applicable	Not applicable as this SPPR refers to greenfield or edge of city/ town locations.

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

Table 6: Development Management Criteria

Scale	Criteria	Response
City/ Town	The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	<p>The site is served by Bus stop no. 1646 and 1644 along Collins Avenue Extension with Dublin Bus route 123 serving these stops.</p> <p>The site is surrounded by a range of new bus routes proposed under BusConnects, in particular the A and E spine are located in close proximity to the subject site. Along Collins Avenue, the A3, N4 and L80 will travel. The E spin providing travel between Ballymun-City Centre-Foxrock Church has been granted by An Bord Pleanála on 12th March 2024.</p> <p>In addition, the site is located approximately 600m from the proposed Collins Avenue Station for Metrolink.</p>
	Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection	The proposed development is not located in an architecturally sensitive area. It proposes a height of up to 6 storeys. The site was the former DCC bring centre and Dublin City Depot located within an established urban neighbourhood of Whitehall. The redevelopment of the site for residential use will enable the efficient use of residentially zoned land capable of delivering compact growth. The proposed development is of modest scale and set back from

Scale	Criteria	Response
	<p>of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</p>	<p>Collins Avenue, well within permissible heights envisaged by the Dublin City Development Plan and would not warrant a landscape and visual assessment. However, a series of 3D massing images of the proposed development viewed from the adjoining rear gardens of the dwellings on Collins Avenue and Crestfield Close have been prepared. These images include the scale and extent of the existing evergreen and deciduous trees based on the arboricultural survey. Please refer to section 7.3.3 of the Architecture Design Statement prepared by Coady Architects.</p>
	<p>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>The gross site is 1.72 ha and of relatively small scale. The proposed development consists of public open spaces and a variety of massing and block forms have been utilised to achieve a scale of development that meets the required density on the site. The surrounding scale of development adjoining the site varies with 2 storey residential units located to the east, west and south of the site. Towards the north of the site, heights range from 2 to 6 storeys. The proposed development responds to the prevailing context while also achieving the required density of an infill site located in a City urban neighbourhood and in proximity to existing, permitted and proposed high-quality public transport.</p>
<p>District/ neighbourhood/ street</p>	<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</p>	<p>The part 8 site is the former bring centre and Dublin City Depot. It is fully tarmacked and includes a number of sheds and warehouses. It is closed off by a gate on Collins Avenue. There is a thick tree boundary between the site and no. 630 to 662 Collins Avenue. The existing trees will be retained at the site and reinforced with additional tree planting.</p> <p>Owing to the irregular shape of the site, the proposal has sought to retain the natural features on the site including the trees and incorporate new streets with public open space and community, arts and cultural spaces to deliver a positive contribution to the neighbourhood.</p> <p>The proposed development has endeavoured to retain the existing residential amenity of the area while also enabling the delivery of an infill development. The development also includes a cyclist and pedestrian link across the site as well as provision for a future connection between the site and Shanowen Road. It is strongly considered that the proposed development responds to the natural</p>

Scale	Criteria	Response
	<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</p>	<p>and built environment with a high-quality scheme that will positively contribute to the urban neighbourhood.</p> <p>The proposed development will front a new vehicular access route across the site and provide passive surveillance to the proposed public open space and community, arts and cultural space.</p> <p>As can be seen on the elevation drawings prepared the proposed blocks are monolithic while including rhythm and symmetry in the façade treatment.</p> <p>No uninterrupted walls of building are proposed. All corners are turned with passive surveillance provided onto the street and the proposed public open space.</p> <p>Please refer to section 5.3 of the Architecture Design Statement for details on materials. This allows for robustness as well as aligns with prevalent materials used in the area.</p>
	<p>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).</p>	<p>There is no direct interface between the application site and Collins Avenue other than the junction at Collins Avenue and Collins Avenue Extension, which is the access point to the Part 8 site. The site is enclosed with no active street frontage, and abuts adjoining uses and provides an infill opportunity for development.</p> <p>The high-quality proposal will provide an improved streetscape and improve the public open space and community space offering in the area. The proposal will also create a human scale between the landscaped and built areas of the site, allowing for passive surveillance.</p> <p>A Desktop Flood Risk Assessment has been undertaken for the proposed development.</p>
	<p>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</p>	<p>Since the relocation of the bring centre to Ballymun, the site has been vacant. The proposal retains the current access arrangements to the site while also delivering a cohesive residential development with community, arts and cultural space with public open space which will positively integrate with the adjoining uses. In addition, a new pedestrian and cyclist route is proposed between the subject site and the Shanowen Business Estate which will improve the legibility and connectivity between the site and the surrounding are.</p>

Scale	Criteria	Response
	<p>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</p>	<p>The Part 8 application comprises 106 apartment units (49 no. 1 bed, 37 no. 2 bed and 20 no. 3 bed). The general area of Whitehall is largely dominated by semi-detached and terraced housing. Data extracted from the 2022 census shows that 85.9% of the residential stock in the area³ consists of houses. The stock is also, for the vast majority, privately owned (with or without mortgage) (69%). If those who rent from a private landlord are considered as well, this means that over 88% of the housing stock in the area is either privately owned or rented. The general area as described in the previous paragraphs is largely dominated by 3-bed type units. The existing housing stock consists of 47.9% 3-bed units and only 4.6% one-bed, clearly showing a mismatch between demand and supply. The proposed development will help alleviate demand in the area.</p>
<p>Site/building</p>	<p>The form, massing and height of proposed development should be carefully modulated so as to maximise access to natural daylight ventilation and views and minimise overshadowing and loss of light.</p>	<p>A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.</p> <p>The Design Statement sets out in detail the design rationale of the scheme. The majority of apartment are dual or corner aspects. There are no single aspect north facing units proposed. All apartments have been designed to include generous storage provision. The layout is consistent over each storey so as to avoid noise transmission across units.</p>
	<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'</p>	<p>A sunlight and daylight assessment prepared by Digital Dimensions is enclosed with this application. Please refer to this report for further information.</p>
	<p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in</p>	<p>We refer to the enclosed Sunlight & Daylight report. The proposal meets all the requirements. No compensatory measures are required.</p>

³ Including the Whitehall A, B and C and Beaumont A electoral divisions

Scale	Criteria	Response
	<p>respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</p>	
<p>Specific Assessment</p>	<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</p>	<p>Micro-climate effects relate to tall buildings where wind can be accelerated either through narrow channels between these structures or, from being accelerated downward towards the ground through downdraft effect.</p> <p>A Wind Micro-Climate Modelling Study has been undertaken by B-Fluid and accompanies this application. The study concludes:</p> <p><i>"Therefore, the CFD study carried out has shown that under the assumed wind conditions typically occurring within Dublin city for the past 15 years: The development is designed to be a high-quality environment for the scope of use intended of each areas/building (i.e. comfortable and pleasant for potential pedestrian), and, The development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads."</i></p>
	<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision</p>	<p>An AA Screening has been prepared by NM Ecology and is enclosed with this submission. The AA Screening concludes that there is no risk to Natura 2000 interest identified. A preliminary Ecological Appraisal also includes an assessment of the potential impacts to nesting birds and a bat survey has also been prepared by NM Ecology and has been used to inform the preparation of a Preliminary Ecological Appraisal.</p>
	<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</p>	<p>The development is not of such scale that this assessment is required.</p>
	<p>An assessment that the proposal maintains safe air navigation</p>	<p>The development is not of such scale that this assessment is required.</p>
	<p>An urban design statement including, as appropriate, impact on the historic built environment</p>	<p>A Design Statement has been prepared by Coady Architects and is enclosed with this application. There is no impact on the historic built environment.</p>
	<p>Relevant environmental assessment requirements, including SEA, EIA, AA</p>	<p>An AA Screening has been prepared by NM Ecology and accompanies this application.</p>

Scale	Criteria	Response
	and Ecological Impact Assessment, as appropriate	An EIA Screening has been prepared and is enclosed with this application. These are summarised in this report. SEA does not apply.

7.3 Regional Policy

7.3.1 Regional and Spatial Economic Strategy for the Eastern and Midlands Region

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 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 residential zoning. The site will allow consolidation the urban fabric in the area. Under CSO 10, it supports the development of brownfield, vacant and regeneration sites, such as the subject site.

Zoning

The Dublin City Development Plan (CDP) 2022-2028 zones the lands Z1 'Sustainable Residential Neighbourhoods' which objective is 'to protect, provide and improve residential amenities'. Under Z1, the CDP seeks to provide a dynamic mix of uses and to create a sense of community. The aim is to provide for high quality accommodation within easy reach of open space and amenities.

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

The zoning map also indicates a 'roads, street and bridge schemes' which is discussed in further sections of this report on transport. In summary, to comply with the zoning provisions by proposing a new pedestrian and cyclist access point between the site and Shanowen Business Estate.

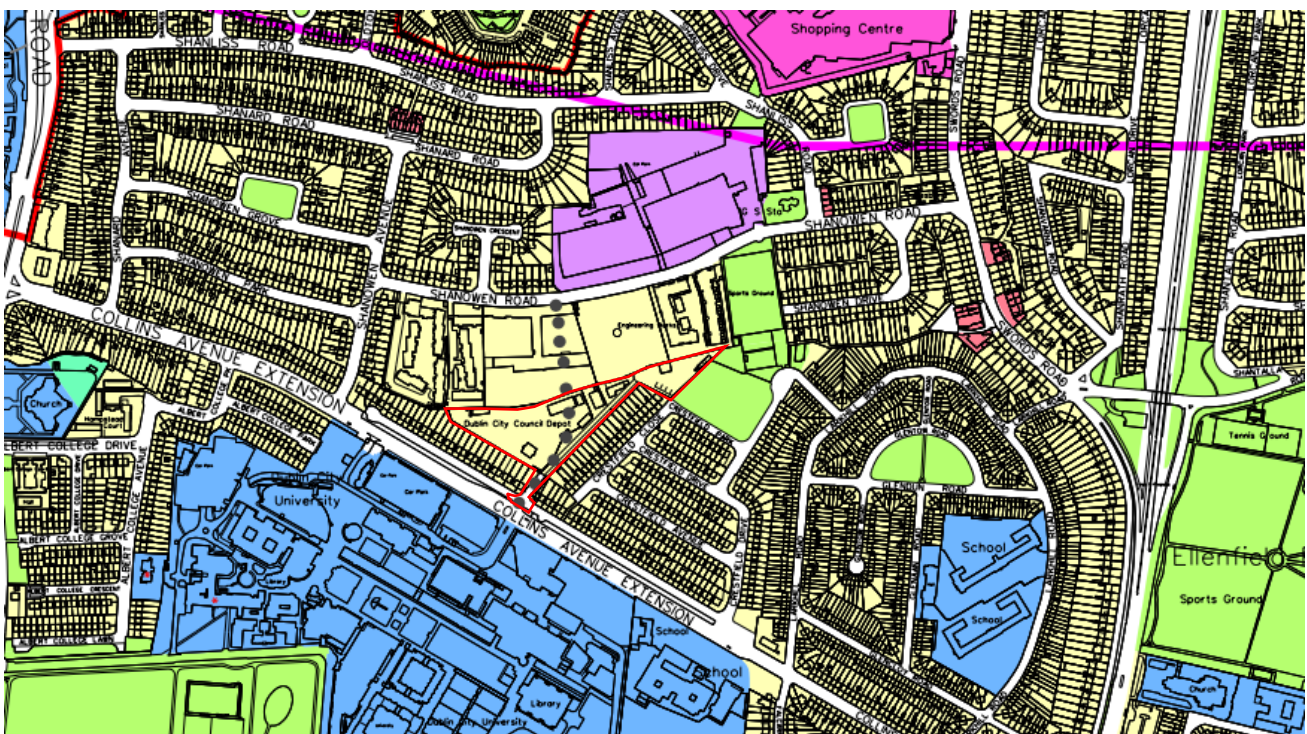


Figure 10: Extract from the DCC CDP Land Use Zoning Map (Source: DCC)

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. The proposed development include a mix of sizes ranging from the 1-bed to the 3- beds and universally designed units.

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 65 uph, based off a net site area of 1.63 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 a bring centre and DCC depot site is at odds with the surrounding uses. 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 mature suburb of Dublin City. It enjoys high accessibility to public transport and is close to a range of facilities.

The proposed development is in accordance with QHSNO11 'Universal Design'. 32% of the units have been designed to Universal Design standards.

The proposed development includes a community and cultural/arts space (375 sqm) which is split across two blocks (Block A and B). 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. 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 min city lifestyle for its residents.

As part of the proposed development it is proposed to demolish the existing buildings on the land which comprise of an office building, sheds, warehouses and garages. Section 3.5.2 The Built Environment and policy CA6 *Retrofitting and Reuse of Existing Buildings* together seek to promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction, where possible. It is noted that the current buildings on site would not be suitable for retrofitting or reuse for the purposes of residential development.

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 54 no. car parking space or a ratio of 0.5. It makes generous allocations for cycle parking, including cargo bikes and it is located near a range of buses, including two BusConnect corridors (Spines A and E) and within 600m of the proposed Collins Avenue MetroLink Station. 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 65 uph, provides for connectivity between uses, and includes facilities which can be used by the broader community.

High quality public realm proposals are catered for as part of the development in accordance with SMT9. The development has made allocation for a possible pedestrian and cyclist link to the north. Currently, at the access point to the site, 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 drawings SHB4-CAD-DR-MAL-L-P3-0001- Landscape Masterplan

Under SMT010 'Walking and Cycling Audits', the suite of documentation prepared for this part 8 application includes a walking and cycling audit. Please refer to the Traffic and Mobility Management Plan prepared by Malone O'Regan.

SMT27 'Car Parking in Residential and Mixed-Use Developments' promotes sustainable car parking with a view to promote city living and reduced car parking standards. The proposed development includes a 57 no. spaces. 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.

SMT027 identify several street/roads scheme that it intends to implement with the plan-period, which includes the Collins Avenue Extension has shown on the zoning map. The proposed development includes the alignment to provide for a pedestrian lane towards the Shanowen site to the north.

Green Infrastructure and Recreation

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

GI01 ('Green Roof Guidance Document') should also be noted. The development response is provided under the development management section of this report. GI28 'New Residential Development' requires that, in new developments, public open space is provided which is sufficient in amenity, quantity and distribution. The proposed development includes high quality public 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). Strong lines of existing trees are present along the boundaries within the application site. Approximately 60% of the southwest boundary to gardens to Collins Avenue has a dense line of Leyland Cypress (Evergreen) 11m to 12.5m in height. The entirety of southeastern boundary to the gardens Crestfield Close is a line of deciduous Hybrid Black Poplars (Deciduous) ranging from 7 to 17m in height. A significant line of Poplars trees exists outside of the application site along the northeast boundary to the green at Crestfield Close ranging in height from 14m to 22m. A further line of 6m to 11m high Sycamore and Ash occurs outside of the northeastern corner of site beyond the boundary to Shanowen Square.

All trees surveyed have been identified as low-quality Category C (65) or Category U (14) recommended for removal. 14 no. The proposal has been carefully designed to retain trees across the site. The only trees required to be removed are for arboricultural reasons and this is due to their poor condition. Considering the retention of the trees. The proposal will have a negligible impact on the character and appearance of the surrounding landscape. The landscape design proposed includes new high-quality tree planting that will enhance the amenities and visual appearance of the local surrounding area. In addition, the proposed new tree planting will improve the canopy cover on the site and within the local area. 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.

Sustainable Environmental Infrastructure and Flood Risk

SI10 has been considered in the preparation of the proposed development, which seeks to manage development within and adjacent to River corridors. The objectives states: To require development proposals that are within or adjacent to river corridors in the city (excluding the Camac River) to provide for a minimum set-back distance of 10-15m from the top of the river bank in order to create an appropriate riparian zone. The Council will support riparian zones greater than 10 metres depending on site specific characteristics and where such zones can integrate with public/communal open space.

A culverted watercourse passes through the Site near the northern boundary. It is understood to be the remains of the River Wad, which formerly arose in Poppintree and reached the coast at Clontarf. The river appears to have been culverted in its entirety, and re-routed to connect to the River Tolka. On this basis it is now considered to be an artificial storm drain rather a natural watercourse. This watercourse is not identified by the EPA on the EPA Maps Portal. The site drains to a culvert that formerly contained the River Wad. It is understood that the culvert connects to the River Tolka, which flows south-east and meets the coast near Dublin Harbour. A 5m wayleave for the culvert has been provided for in the site layout in line with Dublin City Council requirements.

In consultation with the DCC Drainage Department it was determined that the de-culverting of the Wad Stream would not be appropriate in the context of the subject site due to site specific constraints as well as considering the planning policy objectives such as the provision of public open space and the delivery of a dense development on the site to comply with national, regional and local planning policy. The proposed development has sought to enhance the ecological nature of the site through alternative measures which are discussed further in this report and the accompanying Landscape Design Report prepared by Mitchell Associates with input from NM Ecology.

Culture

In accordance with CUO25, the proposed development is in excess of 10,000 sqm and therefore includes a provision of community, arts and cultural uses, The proposed scheme includes 375 sqm of community, cultural and arts space split across two blocks site. This represents 5% of the total area. The proposed space includes 275 sqm (3.7%) allocated at the Ground floor of Block A and 100 sqm (1.3%) allocated at the Ground Floor of Block B. The design is flexible in nature to cater for a range of cultural/arts and community activities needs as they arise. Multifunctional spaces are provided to support a variety of future uses and are supported by WC's, stores, and kitchenettes. The final details of the internal layouts will be discussed and agreed with Dublin City Council and the detailed and tender stage of the project. The proposed community, arts and cultural space will

be managed by PPP co. and will be available for both residents and the surrounding community to utilise. A booking system will be developed during the operation of the scheme to facilitate activities and meeting space requirements as the needs arises.

Development Management Standards

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

Table 7: Planning Application Documentation

Reports	Threshold	Application Reference
Architectural Design Report	50 or more residential units	See Architect Design Statement
Housing Quality Assessment	All residential development	See HQA
Landscape Design Report	30 or more residential units	See Landscape Design Report
Planning Report	30 or more residential units	This report
Daylight and Sunlight Assessment	All apartment developments	See Daylight and Sunlight Assessment
Community and Social Audit	50 or more residential units Any development comprising of community or social infrastructure	See Social Infrastructure Audit
Lifecycle Report	All apartment developments	See Building Lifecycle Report
Community Safety Strategy	100 residential units	See Architect Design Statement
Operational Management Statement	30 or more residential units	See Building Lifecycle Report and Operational Waste Management Plan
Traffic and Transport Assessment	50 or more residential units	See Traffic Mobility Management Plan
Mobility Management Plan / Travel Plan	20 or more residential units Any development with zero/reduced car parking.	See Traffic Mobility Management Plan
Road Safety Audit	Any development with construction of new roads, materially affects vulnerable users and amends existing roads or generating significant road movement	See Quality Audit
Site Specific Flood Risk Assessment	Any developments within a flood zone a and b	See Desktop Flood Risk Assessment
Engineering Services Report (Civil and Structural)	30 or more residential units	See Engineering Report
Site Investigation Report	All developments on site that comprise of contaminated lands	See Site Investigation Report and Waste Classification Report

Reports	Threshold	Application Reference
	and/or where basement is proposed.	
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.	Not Applicable. The site is not within a designated noise zone as indicated on the development plan zoning maps.
Conservation report	Any development relating to a protected structure, within the curtilage of a protected structure, and / or effecting or within the curtilage of a protected monument.	n/a
Retail Impact Assessment	Retail development *** of 2,000 sq. m (net comparison floorspace) and 1,500 sq. m. (net convenience floorspace) outside of the city centre and KUV's.	n/a
Ecological Impact Assessment	All developments that are located within or adjacent to any sensitive habitat, on sites that could contain protected species or in a quality landscape environment.	See Preliminary Ecological Appraisal
Appropriate Assessment Screening and NIS	An Appropriate Assessment Screening is required for all developments. A stage 2 (Natura Impact Statement) is required where significant effects on the environment are likely either alone or in combination with any other project.	See Appropriate Assessment Screening Report. NIS not required.
Environmental Impact Assessment	All developments within the threshold set out in Planning and Development Act 2000, as amended or any development	See EIA Screening Report.

Reports	Threshold	Application Reference
	that has a significant impact on the environment.	
Landscape and Visual Impact Assessment, Microclimate Assessment, Telecommunications Report – see Appendix 3	Site specific circumstances	Wind Microclimate Modelling Report prepared by B-Fluid Glint and Glare Assessment prepared by Macroworks

Brownfield Sites

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

Consideration	Development Response
To encourage innovative, high quality urban design and architectural detail in all new development proposals	Please refer to the Architect Design Statement
To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.	
To respect and enhance existing natural features of interest.	The principal natural features are the trees located to the west of the site. The proposed layout seeks to retain as many trees as possible.
To contribute to the streetscape creating active and vibrant public realm.	The proposed development includes the provision of public open space located centrally on the site will avail of passive surveillance from the proposed buildings. A pedestrian and cyclist link is proposed at the site with provision allowed for a future connection between the site and the Shanowen Business Estate area. This future connection will provide an attractive proposition at this location creating pedestrian and cyclist movements in and out of the site.
To create animation and create activity at street level and vertically throughout the building.	
To provide for appropriate materials and finishes in the context of the surrounding buildings.	Please refer to the Architect Design Statement
To ensure land contamination is appropriately dealt with and mitigated against.	The site is not contaminated. Please refer to the Ground investigation Report for further information.
To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.	Please refer to the Architect Design Statement
To create new compositions and points of interest.	The proposed location of the community space along with the provision of public open space at the site will provide for a new point of interest and amenity for residents of the scheme and surrounding area.
To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area	The proposed development includes 375 sqm of community, arts and cultural space, in addition to 106 residential units.

Consideration	Development Response
To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.	Please refer to the landscape plans and arboricultural plans which show how existing trees are being retained.
To prioritise pedestrian and cycle movements in connection with public transport infrastructure.	There is a strong focus on pedestrian and cycle movement as part of the site layout. As per the requirements of the Development Plan, a new pedestrian and cyclist link is proposed between the site and the Shanowen Business Estate area.
To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes	The Part 8 site is infill in nature with no interface along Collins Avenue and access via the Collins Avenue and Collins Avenue Extension Road. A new internal road has been proposed with buildings forming a defined street edge and the public open space designed to maximise the passive surveillance afforded from Block A and B
To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.	Please refer to the recommendations of the accompanying Climate Action, Sustainability and Part L Compliance Report
Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.	Waste management has been duly considered. There is adequate waste storage to service the development and visibility splay for refuse trucks have been prepared. Please refer to the Operational Waste Management plan and the Resource Waste Management Plan.

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
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.	The proposed development will retain insofar as possible trees and hedgerows located along the boundary of the site. By nature, the site itself is of limited ecological value. 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. A number of Biodiversity enhancement measures are proposed as part of the development, please refer to the accompanying Landscape Design Report and the Preliminary Ecological Appraisal.
The connectivity of proposed open spaces to adjoining existing open space or natural assets	The principal existing open space in the area is that located immediately to the east, south of St Kevin’s

Standard	Development Response
<p>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>Football Club. There will be open space proposed along the common boundary to ensure the continuity of the green infrastructure network. In other parts of the site, the design has sought to located areas of open space along the boundary with the rear gardens of existing units.</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. As per the landscaping proposals on site, it is proposed to retain 65 no. trees.</p>

Surface Water Management and SuDS

Standard	Development Response
<p>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.</p>	<p>A Surface Water Management Plan for the Development is incorporated into Malone O’Regan Engineering Report.</p>
<p>SuDS measures shall be set out clearly in an assessment of the drainage details prepared by a qualified Engineer</p>	<p>Please refer to the Engineering Report prepared by Malone O’Regan which provides a comprehensive overview of the SuDS measures proposed at the site.</p>

Green/Blue Roof

Consideration	Development Response
<p>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</p>	<p>Please refer to drawing no. SHB4-CAD-DR-MOR-CS-P3-150 prepared by Malone O’Regan.</p>

Urban Greening

Consideration	Development Response
All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc.	Please refer to landscape drawing no. SHB4-CAD-DR-MAL-L-P3-0001- Landscape Masterplan prepared by Mitchell + Associates

Landscape Plans and Design Reports

Consideration	Development Response
Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.	A Landscape Design Report prepared by Mitchell Associates accompanies this application.
Boundary Development Standards treatments and public realm improvements should also be illustrated within landscape plans	Please refer to landscape drawing no. SHB4-CAD-DR-MAL-L-P3-0001-Landscape Masterplan and Landscape Design Report.
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 development proposal activates an existing street and effectively creates a new enclosed public open space, creating a new vibrant node of activity. Community uses and public realm combine to achieve this, with good passive surveillance from apartments above. The new public realm and street interface combine to create attractive spaces for enjoyment and social contact.
Open space should be overlooked and designed to ensure passive surveillance is achieved	Please refer to landscape drawing no. SHB4-CAD-DR-MAL-L-P3-0001- Landscape Masterplan prepared by Mitchell + Associates
The space should be visible from and accessible to the maximum number of users.	Please refer to drawing no. SHB4-CAD-DR-MAL-L-P3-0001- Landscape Masterplan prepared by Mitchell + Associates
Inaccessible or narrow unusable spaces will not be accepted.	No inaccessible or unusable spaces are proposed.
The level of daylight and sunlight received within the space shall be in accordance with the BRE	Please refer to the Daylight and Sunlight assessment.

Standard	Development Response
Guidelines or any other supplementary guidance document – see Appendix 16	
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 principal existing open space in the area is that located immediately to the east, south of St Kevin’s Football Club. There will be open space proposed along the common boundary to ensure the continuity of the green infrastructure network. In other parts of the site, the design has sought to locate areas of open space along the boundary with the rear gardens of existing units.
Protect and incorporate existing trees that are worthy of retention into the design of new open spaces.	The proposed layout has ensured that the footprint of building is sufficiently removed from existing trees and hedgerows to minimise the impacts on their root protection zone.
Retain and incorporate other existing natural features into the design to reinforce local identity, landscape character, and amenity.	Generally, the site character is at great variance from the surrounding area and therefore the development will allow to improve the landscape character and amenity of the area.
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).	Please refer to SHB4-CAD-RP-MAL-L-P3-0002-Collins Avenue Concept Sketchbook and Landscape Design Report prepared by Mitchell + Associates.
Materials must be appropriate, durable and of a good quality. The texture and colour of materials must be sympathetic to the locality and be an integral part of the design.	Please refer to the Architect’s Design Statement.
Street furniture should be sited such that it does not provide an obstacle for people with disabilities and should be designed so that it is fully accessible where feasible.	Please refer to landscape drawing no. SHB4-CAD-DR-MAL-L-P3-0001- Landscape Masterplan prepared by Mitchell + Associates
Age friendly measures should be incorporated into the design.	Please refer to landscape drawing no. SHB4-CAD-RP-MAL-L-P3-0002-Collins Avenue Concept Sketchbook and Landscape Design Report prepared by Mitchell + Associates.
Permeability and accessibility for all users, particularly disabled persons should be provided	Please refer to the Architect’s Design Statement.

Standard	Development Response
<p>Cycle and pedestrian friendly routes should be accommodated.</p>	<p>Pedestrian and cycle movements are prioritised over car movements throughout the site. A new pedestrian and cycle link is proposed across the site and future provision between the site and the Shanowen Business park lands.</p>

Boundary Treatments

Standard	Development Response
<p>Details of all existing and proposed boundary treatments, including vehicular entrance details, should be submitted as part of any planning application.</p>	<p>The existing and proposed boundary treatments are identified on Coady Architects drawing SHB4-CAD-DR-COA-AR-P3- 5505 Proposed Site Boundary Treatments and can be summarised as follows:</p> <ul style="list-style-type: none"> • Existing c 1.8 to 2.5m high masonry walls to Shanowen Hall and Milner’s Square are retained. On the application site side the walls will be repointed where necessary, rendered and provided with a precast concrete coping. The existing palisade fencing above the walls will be replaced with a more appropriate residential railing 1.2m. • Concrete post with timber panelling c 2.7 m high is proposed along the northern boundary to screen the existing commercial buildings. It is envisaged that this is a short-term measure to provide visual screening of the existing dilapidated structures and will be replaced with a permanent boundary incorporating gates for the required connectivity when development occurs on the adjacent SHD application site. • Existing c. 1.8m masonry walls topped in places with timber fencing to the rear gardens on Collins Avenue and Crestfield Close are retained. On the application site side, the walls will be re-rendered. • Existing c. 2m high masonry wall to the local green at Crestfield Close/ Crestfield Road is retained. On the application site side, the walls will be re-rendered, and provided with a precast concrete coping. The existing palisade fencing above the wall will be replaced with a more appropriate residential railing 1.2m high.

Public Open Space

Standard	Development Response
10% is required in Z1 zoning.	The site area is c.17200 sqm. Proposed open space amounts to 1,925 sqm or 11.7%, which is in excess of the 10% requirement.

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.	As stated earlier, the development includes for play areas. These are located to the south of Block A and within the area of public open space south of Block B.

Apartment Standards

Standard	Development Response
<p>Unit Mix</p> <p>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 & Community Services Department.</p>	<p>This part 8 proposal was formulated jointly with the DCC Housing Department. The proposed development includes 46% of one-bed units and 35% of two-bed units.</p> <p>The proposed unit mix therefore accords. The proposed unit mix will greatly contribute towards meeting the strong demand for this unit mix and housing typology in the area.</p>
<p>Unit Size / Layout</p> <p>Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments</p>	<p>A HQA has been provided with this Part 8 application and provides a breakdown of each unit and demonstrates compliance. All units meet the floor area requirements in accordance with Appendix 1 of the Apartment Guidelines.</p>
<p>Dual Aspect</p> <p>Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate</p>	<p>56% of the apartments are dual aspect and therefore accord.</p>

Standard	Development Response
<p>Floor to Ceiling Height 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 plans submitted show that proposed floor to ceiling heights of 3.1m will be provided for all floors above ground levelThe proposed development has been designed in accordance with these standards and therefore complies.</p>
<p>Lift, Stair Cores and Entrance Lobbies a maximum of 12 apartment per core may be provided</p>	<p>Up to 5 units per core are proposed. The development complies.</p>
<p>Internal Storage 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 Appendix 1 of the Apartment Guidelines.</p>
<p>Private Amenity Space 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 the requirements set out in Appendix 1 of the apartment guidelines. It is noted that a variation of up to 5% can be applied to room areas and widths subject to overall compliance with required minimum overall apartment floor areas as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023.</p> <p>Please refer to the architecture drawings prepared by Coady Architects which clearly delineates the private amenity space. .</p>
<p>Communal Amenity Space All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development. The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</p>	<p>The proposed development includes 3,140 sqm of communal open space and therefore exceeds the minimum standards.</p>
<p>Internal Communal Facilities</p>	<p>The development is for 106 units and includes 375 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.</p>
<p>Security 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>The design of the development ensures activity along all building facades to create a sense of safety and security. It is noted that entrance doors are visible and would be well overlooked. This is considered to be acceptable and would comply with Section 15.9.11 of the Dublin City Development Plan 2022-2028.</p>
<p>Access and Services 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.</p>
<p>Refuse Storage Refuse storage and collection facilities should be provided in all apartment schemes.</p> <p>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 the accompanying plans prepared by Coady Architects for Block A, B and C.</p> <p>An Operational Waste Management Plan accompanies this part 8 application.</p>
<p>Lifecycle Reports 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. The project aims to achieve a BER Rating of A2 for each apartment and will implement a range of passive and active energy and carbon emission reduction measures. The Building Lifecycle Report also outlines low energy technologies that are being considered for the development during the design stage including Exhaust Air Heat Pumps and Demand Control Ventilation. It is considered that the measures outlined in the Building Lifecycle Report would ensure a high-quality, environmentally sustainable, and energy-efficient building.</p>
<p>Operational Management and Maintenance 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</p>

Standard	Development Response
	<p>residents over a 25-year period. Thereafter the maintenance and management of the development will be handed over to Dublin City Council.</p>
<p>Microclimate – daylight and sunlight, wind and noise 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. It states “Proposals close to noisy places, such as busy streets / railway lines, may need a noise impact assessment and mitigation plan.” The subject site is in a suburban location that is set-back from Collins Avenue. The site is not within a designated noise zone as indicated on the development plan zoning maps. A noise impact assessment is therefore not required in this location.</p> <p>This application is accompanied by a Wind, Microclimate Modelling Report which shows that the proposed development would not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings. Moreover, in terms of distress, no critical conditions were found for “Frail persons or cyclists” and for members of the ‘General Public’ in the surrounding of the development.</p> <p>The application is accompanied by a Sunlight and Daylight Analysis which demonstrates that the proposed development is well designed for sunlight, with 95.3% of units meeting the minimum recommended 1.5 direct sunlight hours. When the existing trees are included in the assessment model, 84% of units meet the minimum recommended 1.5 direct sunlight hours. These results are in line with the BRE guidelines example for an apartment layout where 4 in 5 achieves the target sunlight hours.</p>
<p>Daylight and Sunlight 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>Separation Distance</p>	<p>The recently issued Compact Settlement Guidelines for Planning Authorities SPPR1 reduces the separation</p>

Standard	Development Response
<p>Traditionally a minimum distance of 22m is required between opposing first floor windows.</p>	<p>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>Internally, the blocks are not laid out in such manner that there are directly facing each other, giving rise to issues of separation distances.</p> <p>Externally, at a minimum, the development applies at least a 23.5m separation distance (the closest block being that proposed by the Nest SHD proposal on the Shanowen Business Estate site.</p>

Standards as Derived from the Appendices

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

Standard	Development Response
<p>Density Ranges Table 1 – Appendix 3 state that density in the Outer Suburbs should be within a range of 60-120 uph.</p>	<p>The proposed development has a density of 65 uph and therefore is well within the range of the CDP.</p>
<p>Plot ratio and coverage: The site is located within an outer residential area, therefore the following requirements are applicable: Indicative plot ratio – 1.0-2.5 Indicative Site Coverage – 45-60%</p>	<p>The CDP indicates that plot ratios and site coverages are not fixed but are indicative. The proposal generates: Site coverage: 22% Plot ratio: 0.66</p> <p>The proposed site coverage and plot ratio is considered acceptable in consideration with the site constraints while also endeavouring to deliver a high quality residential development together with community uses.</p>
<p>Bicycle Parking Standards Table 1 of appendix 5 sets out parking standards: Residential apartment: 1 space per bedroom (long term) and 1 per 2 apartments (short term). Community/ Arts/ Culture Long stay: 1 space per 5 staff in community centre Short stay 1 per 100 sqm Gross Floor Area for community centre</p>	<p>183 long stay spaces are provided and 63 short stay spaces are provided.</p> <p>Additional cargo bike parking space is provided.</p>

Standard	Development Response
<p>Car Parking Standards The site falls under Zone 2. Maximum standards: 1 per dwelling</p>	<p>The proposed development provides 57 no. spaces which equates to a ratio of 0.5.</p>
<p>Electric Vehicles All new developments must be futureproofed to include EV charging points and infrastructure. In all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.</p>	<p>The proposal for this development is that 50% all public spaces will have EV chargers installed in line with DCC development plan and the rest will ducted for future EV charging points.</p>
<p>Motorcycle Parking 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>5 no. spaces have been provided.</p>
<p>Waste Storage Facilities</p> <ul style="list-style-type: none"> • Receptacles that are designed for reuse, with the exception of a specific area designated by a local authority as being only suitable for the collection of nonreusable receptacles such as bags, ideally of 1,100 litre capacity, must be used. • 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. • Suitable wastewater drainage points should be installed in the receptacle bin storage area for cleaning and disinfecting purposes. 	<p>The proposed Waste Storage Area for Apartment Blocks A, B & C are located on ground level. Refer to drawing no.</p> <ul style="list-style-type: none"> • SHB4-CAD-DR-COA-AR-P3- 5520 Block A - GA - Ground Floor Plan • SHB4-CAD-DR-COA-AR-P3- 5524 Block B - GA - Ground Floor Plan • SHB4-CAD-DR-COA-AR-P3- 5527 Block C - GA - Ground Floor Plan <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>Green and Blue Roof 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>Please refer to Engineering Report prepared by Malone O'Regan and SuDS detail drawing no. SHB4-CAD-DR-MOR-CS-P3-151 for typical roof details.</p>

Standard	Development Response
<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>SuDS Requirements</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-CAD-DR-MOR-CS-P3-151.</p>
<p>Surface Water Management Planning</p> <p>Development including or in excess of 2 no. residential units or 100 sq. m. of nonresidential uses (including social and community uses) All developments with surface water implications which fall within these thresholds will be required to prepare a SWMP as part of their project design process.</p>	<p>Please refer to the Engineering Report prepared by Malone O'Regan which details the surface water management proposed as part of the project.</p>

8. ENVIRONMENTAL ASSESSMENTS

8.1 Environmental Impact Assessment

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

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

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

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

8.2 Appropriate Assessment

An Appropriate Assessment Screening prepared by NM Ecology accompanies this Part 8 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 'incombination 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 incombination effects can also be ruled out.

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

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

8.3 Preliminary Ecological Appraisal

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

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

9. ENGINEERING

9.1 Foul Water

An existing network of drainage runs around the perimeter of the site on two sides. These underground drains carry foul water towards existing treatment areas in the north Dublin area. Due to the relative levels of the existing drainage within the road and the proposed site levels, it is possible to achieve a gravity connection to the foul water drainage pipework installed. There is a 150mm clay sewer running from Crestfield Park parallel to number 43 boundary on the northeastern end of the site. There is a 225mm concrete sewer running on Collins avenue which crosses the entrance road into the site on the southern end of the site.

The proposed foul water drainage system is designed to comply with the 'Greater Dublin Strategic Drainage Study (GDSDS) Regional Drainage Policies Technical Document – Volume 2, New Developments, 2005' and the 'Greater Dublin Regional Code of Practice for Drainage Works, V6.0 2005'.

The proposed foul water drainage layout for the development is indicated on Malone O'Regan drawings SHB4-CAD-DR-MOR-CS-P3-130. Foul water from new housing units will be collected within a gravity drainage network and directed towards the existing public sewer system.

9.2 Water Supply

A 100mm diameter watermain is located on the site coming in from Collins Avenue entrance road, travelling along the southeastern boundary to the centre of the site before crossing to the northern boundary. This watermain then travels a distance towards the northwestern corner of the site before terminating.

The proposed watermain layout is indicated on drawing SHB4-CAD-DR-MOR-CS-P3-140 which accompanies this planning application.

9.3 Surface Water

An existing network of drainage runs around the perimeter of the site on one side. These underground drains carry surface water runoff towards existing catchment areas in the north Dublin area. Due to the relative levels of the existing drainage within the road and the proposed site levels, it is possible to achieve a gravity connection to the surface water drainage pipework installed. There is a 1050mm concrete sewer running parallel to the northern boundary, this is a culvert of the Wad Stream.

The proposed surface water drainage layout for the development is indicated on Malone O'Regan drawings SHB4-CAD-DR-MOR-CS-P3-130, 150 and 151. Surface water runoff from new internal road surfaces, footpaths, other areas of hardstanding and the roofs of buildings will be collected within a gravity drainage network and directed towards an attenuation storage system. The attenuation storage is sized to cater for a 1 in 100-year storm event. The outfall from each attenuation pond will be restricted to the applicable 'greenfield' runoff rate using a Hydrobrake flow control device. A number of sustainable drainage systems (SuDS) are proposed in order to minimise the volume and rate of runoff from the site. The proposed SuDS measures on site include bioretention swales, tree pits, green roofs, blue roofs, rain gardens, permeable paving and dry ponds.

10. CONCLUSIONS

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

The proposed development will make a positive contribution to the consolidation of the urban fabric in Dublin 9, particularly as it reuses the site of the Collins Avenue Bring Centre. The housing mix is reflective of social housing need in area E of the Council's Waiting List. It will particularly allow for downsizing opportunities and provide much needed housing for those on the Council housing waiting list.

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

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



20 Fitzwilliam Place, Dublin 2, D02YV58,
Ireland



Phone. +353 1 6762594



planning@mdb.ie



www.mdb.ie