Review of Building Height & Proposed Amendments to

North Lotts and Grand Canal Dock
Planning Scheme 2014

Dublin City Council, May 2019
Contents:

Chapter 1. Background to the SDZ Planning Scheme and Implementation to date  P 4
Chapter 2. Public Consultation: Summary of Submissions and Assessment.    P19
Chapter 3. Overview of the Independent Review by Loci and the submissions received P51
Chapter 4. Proposed Amendments to the SDZ Planning Scheme.                      P58
Chapter 5. Environmental Assessment conclusion statements.                       P68

Chapter 1

Background to the SDZ Planning Scheme and Implementation to date
1.1 Chapter 1 Content

Chapter 1 of the Review of Height in the North Lotts and Grand Canal Dock SDZ comprises three sections, addressing (1.2) The making of the SDZ Planning Scheme 2014, (1.3) Implementation of the Planning scheme to date, and (1.4) Recent relevant planning policy, as set out below.

1.2 The making of the North Lotts and Grand Canal Dock Planning Scheme 2014.

1.2.1 The Hubs and Development Code

1.2.2 Building Heights

1.2.3 Evolution of Building Height during the Planning Scheme Process

1.2.4 Assessment of Planning Applications

1.3 Implementation of the Planning Scheme to date and building heights achieved.

1.3.1 Capacity

1.3.2 Status of City Blocks

1.4 Recent relevant policy since the adoption of the Planning Scheme in 2014.

1.4.1 Dublin City Development Plan 2016-2022

1.4.2 Strategic Planning and relevant legislative change in recent years

1.4.3 Recent Government Guidelines on Building Height

1.2 The making of the North Lotts and Grand Canal Dock Planning Scheme 2014

The North Lotts and Grand Canal Dock SDZ was designated by Government on 18th December 2012. The Planning Scheme for the SDZ was approved by the City Council on 5th November 2013 following extensive public consultation, and by An Bord Pleanala in May 2015, following an Oral Hearing.

The location of the Strategic Development Zone within the city was a significant factor in determining its eventual urban structure. Historically, the city expanded from the old city centred on Dublin Castle/Temple Bar and into what became the 18th Century City with its characteristic street grid inclusive of the Georgian squares and iconic buildings such as Trinity College and the Customs House. Development within the adjoining 66 hectares of the SDZ was based on a largely pre-established street network, which opened up the rectilinear “Lotts” created following the reclamation of lands on either side of the Liffey, and also a newly planned street grid, forming a new network incorporating a range of existing buildings. These included many newer buildings from the 1980s onwards, including the IFSC, residential blocks, employment uses (mainly office based) and commercial uses.

The approved planning scheme provides a coherent urban structure of which height is an integrated component. The urban structure reflects Dublin’s relatively narrow streetscape and also responds to the higher 6-8 storey perimeter blocks that contain the street in the tradition of higher density European cities such as Barcelona and Copenhagen. This street pattern is punctuated by a number of civic spaces complemented by taller buildings at considered locations. The result is that the scheme provides for buildings up to 10 storeys along the Quays and landmark buildings up to 22 storeys in the Dublin context provided for at Bollands Mills, Spencer Dock, the Point Square and Britain Quay. (See Section 5.4 of the Planning Scheme)
A set of defined structuring principles helped frame future development; An orthogonal layout took into account the merits of waterside locations and campshires, and also the route of Luas and rail stations including future DART underground. The urban structure also considered the potential of already developed areas and their merits in relation to future planning (e.g. the 3 Arena, Convention Centre, and Bord Gáis Energy Theatre).
1.2.1 The Hubs and Development Code

Five distinct Hubs were designated across the scheme, each of which would have a concentration of commercial/entertainment uses, cafes and restaurants. These would animate the area and be located at Spencer Dock, Point Village, Britain Quay, Grand Canal Square, and Boland’s Mills. The hubs would each have their own character and role, having mixed uses, an open space, landmark buildings and quality public realm. The background to building heights in the area is set out in section 4.10.6 and 4.10.7 of the planning scheme.

The SDZ development code (see Figure 35 of the scheme, illustrated below) set out the overall pattern of development defining street-types, public spaces and fixed versus flexible building lines. Proposed bridge locations were also included, and street widths were set out along with indicative cross sections. This formed the framework for more detailed requirements for each ‘City Block’. Building heights were considered generally appropriate in the range 5-8 storeys, reflecting the importance of urban streets in Dublin and in cities such as Barcelona. Some areas were identified as suited to greater height however, and such sites were specifically earmarked for landmark buildings of predefined maximum height as an integral part of the overall urban structure.

For each of the individual 20 City blocks a ‘city block development code’ was devised in the context of the overall scheme. This set specific objectives for building layouts, land uses and building heights within each City block. Public realm and public spaces were also set out. A degree of flexibility was incorporated into the City Block Code, whereby the position of some important building lines were
fixed whilst others were flexible in areas where they would not impact on the desired public realm and streetscape.
The above process, whereby the specific parameters of built development permissible were established, enabled the generation of indicative capacity figures for the entire scheme, and these are outlined in Section 1.2.5 of the Planning Scheme; i.e. an estimated 2,600 residential units and 305,000 sq. m of commercial capacity. The latter figure could increase to approx. 366,000 sq m if the flexibility allowed for in the scheme was utilised (s. 5.4.1 of the Planning Scheme).

### 1.2.2 Building Heights

Section 5.4.5 of the scheme sets out the design rationale for building heights. Heights in the scheme were based on assumed floor to ceiling dimensions of three metres for residential and four metres for commercial uses. Ground floors were to be of standard commercial height for design and adaptability reasons. Large city blocks were to provide a strong streetscape and were typically 6 storey commercial height or 7 storeys for residential. Inside this ‘outer crust’, more local/secondary spaces within the blocks were to be lined by lower buildings of 5 storey commercial or 6 residential storeys. The Liffey Quays, due to the width of the River Liffey in the SDZ, provided an opportunity for variation to the above, with generally 8 storey commercial and 10 residential permissible. Grand Canal Dock, Hanover Quay and Charlotte Quay differed because of the width of the water body and the significance of protected structures in the area. Heights in these areas were planned at 6 commercial and 7 residential storeys, this approach providing for strong streetscapes and a varied typography.

Additional height landmarks were planned in 4 of the hubs, i.e. at Station Square, Point Square, Britain Quay and at Bolands Mills. The height of each of these landmarks buildings was based on merits/characteristics of each individual area with consideration to both views and context in each case. For all buildings more than two storeys higher than those adjacent, a shadow analysis and microclimate analysis was required as part of any planning application. The possibility of underdevelopment was also considered, and for this reason, developments with more than two storeys less than the identified height were not considered acceptable. In addition to the specified target heights, an additional set-back floor could be considered, subject to shadow analysis and a compelling design rationale, except block numbers 1-5 for streetscape/design reasons.

### 1.2.3 Evolution of Building Height during the Planning Scheme Process

The North Lotts and Grand Canal Dock SDZ was designated by Government on 18th December 2012. Dublin City Council, as Development Agency, published a draft planning scheme for the SDZ in March 2013. Following a public consultation, amendments to the draft scheme went on public display in August 2013. Further amendments were then made and on 5th November 2013 the City Council by resolution decided to make the Planning Scheme.

The main amendments in relation to height resulting from the consultation process were to amend Section 5.4.5 page 107 to read as follows:

“In addition to these hub landmarks, there are opportunities for further occasional local landmark buildings in the SDZ up to a 4 storey commercial above the prevailing streetscape height in the vicinity. These buildings must have a distinctive vertical emphasis to read as occasional punctuations in the streetscape. Opportunities for local landmarks occur on main city streets at the corners of City Blocks (Fig 31), at existing and proposed bridgeheads and at the edge of the major civic spaces. Architectural features, such as spires and cupolas, which contribute to the architectural merit of individual buildings, will be considered on their merits, having regard to the criteria in Appendix 5 of the Scheme. These local landmarks must be determined at roll out agreement stage (see 6.1.2).”

Following an oral hearing into the Planning Scheme, the Board, in its decision in May 2014, in approving the Scheme overall, decided to omit the concept of local landmarks mainly because of the vague nature of the proposal. The Board made a further modification (No.2) in relation to height by
removing the option for an extra setback storey from Blocks 1 to 5 mainly due to the pattern of the existing residential buildings, between Mayor Street and Sheriff Street.

1.2.4 Assessment of planning applications

Height in the SDZ Planning Scheme is addressed on p130-132, p173-174, and page 268-169(Appendix 5). This text refers to relevant context, and development plan guidelines set out in section 17.6 of the (then) Dublin City Development Plan 2011-2017. Assessment would be under the development management process and also under the Planning Scheme requirements, including Appendix 5 therein, which presents Assessment Criteria for High Buildings. The latter covers a broad range of requirements (see pp 268-9) reflecting those set out in the Development Plan.

It is also relevant to point out that pre-existing buildings are shown in a light grey colour in the development codes (protected structures are in dark grey). Text on p 223 states that in redeveloping/extending these heights, they ‘shall relate to the prevailing height as set out in the relevant City Block or adjacent blocks in the Development Code.’

Please see also section 1.4.1 below in relation to the current Development Plan.

1.3 Implementation of the Scheme to date and building heights achieved.

Development within the SDZ on foot of the planning scheme has been swift, to the extent that the scheme is now largely built out after less than 5 years. Whilst there was an inevitable lull in progress during the economic recession, development since has progressed well. This said, some large sites remain undeveloped, and may be now re-evaluated for purposes of building height on foot of Government Guidelines.

In terms of the overall quantum of development permitted to date, indicative capacity for commercial development has already been exceeded, and in terms of numbers of units, the majority of planned residential units have received planning permission. The full indicative capacity for residential uses as set out in the planning scheme was 2600 units, and permissions to date allow in excess of 2200 units (representing approx. 85% of the indicative capacity). A number of residential developments remain to be delivered on remaining sites. There remains adequate development potential to exceed the target figure, and therefore a renewed focus on residential delivery is important given the current housing crisis. It is also relevant that delivery of supporting community facilities and amenity spaces in accordance with the planning scheme has been progressing well, and the completion of many large-scale developments has reduced temporary disamenity associated with the construction phase.

1.3.1 Capacity

The indicative commercial capacity of 305,000-366,000 sq. m as set out in the scheme, has been exceeded by 37,000 sq. m to date in terms of planning approvals. This additional capacity is as a result of successful utilisation of the additional set-back floor in conjunction with expanding the footprint within the site where building lines were flexible. This additional capacity, which allows for greater intensity of use and increased numbers of employees, has been achieved without compromising the delivery of quality public realm and streetscapes as part of the City Block Code. Residential developments have similarly benefitted from the flexible planning parameters within the scheme.
### 1.3.2 Status of City Blocks

To provide further detail on progress to date, the following table sets out the current status of each of the 22 city blocks in relation to the implementation of the scheme (as of March 2019). As can be seen, some blocks were built out prior to the publication of the SDZ scheme, whilst others have had a number of applications since 2014.

<table>
<thead>
<tr>
<th>‘City Block’ No.</th>
<th>Planning history</th>
<th>Construction status (March 2019)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Built out prior to SDZ, no design parameters contained within SDZ.</td>
<td>Complete</td>
</tr>
<tr>
<td>2</td>
<td>No applications received for the western portion of this block, so SDZ criteria applied. Applications approved for eastern portion of this block with the approved layout applied to contextual height baseline map.</td>
<td>Commenced</td>
</tr>
<tr>
<td>3</td>
<td>Several applications approved for this block with the approved layout applied to contextual height baseline map.</td>
<td>Not commenced</td>
</tr>
<tr>
<td>4</td>
<td>Built out prior to SDZ, no design parameters contained within SDZ.</td>
<td>Complete</td>
</tr>
<tr>
<td>5</td>
<td>Eastern portion of this block built out prior to SDZ, no design parameters contained within SDZ. Applications approved for western portion of this block with the approved layout applied to contextual height baseline map.</td>
<td>Complete</td>
</tr>
<tr>
<td>6</td>
<td>Built out prior to SDZ, no design parameters contained within SDZ for the majority of the site. The SDZ does give design parameters for the norther portion of this block (11 storey commercial or 13 storey residential) However no applications have been received for this portion of the block.</td>
<td>Not commenced.</td>
</tr>
<tr>
<td>7</td>
<td>No applications received for the western portion of this block, so SDZ criteria applied. Applications approved for eastern portion of this block with the approved layout applied to contextual height baseline map.</td>
<td>Commenced.</td>
</tr>
<tr>
<td>8</td>
<td>Several applications approved for this block with the approved layout applied to contextual height baseline map.</td>
<td>Complete</td>
</tr>
<tr>
<td>9</td>
<td>Several applications approved for this block with the approved layout applied to contextual height baseline map.</td>
<td>Not commenced</td>
</tr>
<tr>
<td>10</td>
<td>Central portion (The O2 Theatre) of this block built out prior to SDZ. Applications approved for eastern and western portion of this block</td>
<td>Commenced</td>
</tr>
</tbody>
</table>
with the approved layout applied to contextual height baseline map.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>11</strong></td>
<td>Several applications approved for this block with the approved layout applied to contextual height baseline map.</td>
</tr>
<tr>
<td></td>
<td>Substantially complete except for 11a &amp; 11C</td>
</tr>
<tr>
<td><strong>12</strong></td>
<td>Built out prior to SDZ, no design parameters contained within SDZ.</td>
</tr>
<tr>
<td></td>
<td>complete</td>
</tr>
<tr>
<td><strong>13</strong></td>
<td>Built out prior to SDZ, no design parameters contained within SDZ.</td>
</tr>
<tr>
<td></td>
<td>Complete</td>
</tr>
<tr>
<td><strong>14</strong></td>
<td>No applications received for the northern portion of this block, so SDZ criteria applied.</td>
</tr>
<tr>
<td></td>
<td>Several applications approved for the southern portion of this block with the approved layout applied to contextual height baseline map.</td>
</tr>
<tr>
<td></td>
<td>Substantially Complete</td>
</tr>
<tr>
<td><strong>15</strong></td>
<td>Several applications approved for this block with the approved layout applied to contextual height baseline map.</td>
</tr>
<tr>
<td></td>
<td>Substantially complete</td>
</tr>
<tr>
<td><strong>16</strong></td>
<td>Built out prior to SDZ, no design parameters contained within SDZ.</td>
</tr>
<tr>
<td></td>
<td>Complete</td>
</tr>
<tr>
<td><strong>17</strong></td>
<td>Several applications approved for this block with the approved layout applied to contextual height baseline map.</td>
</tr>
<tr>
<td></td>
<td>Substantially complete</td>
</tr>
<tr>
<td><strong>18</strong></td>
<td>No applications received for this block, so SDZ criteria applied.</td>
</tr>
<tr>
<td></td>
<td>Not commenced</td>
</tr>
<tr>
<td><strong>19</strong></td>
<td>No applications received for this block, so SDZ criteria applied.</td>
</tr>
<tr>
<td></td>
<td>Not commenced.</td>
</tr>
<tr>
<td><strong>20</strong></td>
<td>No applications received for this block, so SDZ criteria applied.</td>
</tr>
<tr>
<td></td>
<td>Not commenced</td>
</tr>
<tr>
<td></td>
<td>Not relevant (water body only)</td>
</tr>
</tbody>
</table>
1.4 Recent relevant policy since the adoption of the Planning Scheme in 2014.

1.4.1 Dublin City Development Plan 2016-2022

The current development plan sets out the planning “approach to the Docklands and the Port” in chapter 4, ‘Shape and Structure of the City’, and refers to the planning scheme. The approach to taller buildings is introduced in section 4.5.4.1, which states that clustering of taller buildings will be confined to a limited number of areas only. It states; “For example, the North Lotts and Grand Canal Dock SDZ planning scheme provides for a limited number of tall buildings at Bolands Mills, The Point, Spencer Dock Square, and Britain Quay”.

1.4.1.1 The text also states that it is a policy to provide for taller buildings in those limited locations identified in the building height in Dublin Map (see below) in order to promote investment, vitality and identity.

![Building Height in Dublin Context Diagram]
Policies relating to taller buildings are as follows;

It is The Policy of Dublin City Council:

SC16: To recognise that Dublin City is fundamentally a low-rise city and that the intrinsic quality associated with this feature is protected whilst also recognising the potential and need for taller buildings in a limited number of locations subject to the provisions of a relevant LAP, SDZ or within the designated strategic development regeneration area (SDRA).

SC17: To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city, having regard to the criteria and principles set out in Chapter 15 (Guiding Principles) and Chapter 16 (development standards). In particular, all new proposals must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas, open recreation areas and civic spaces of local and citywide importance.

SC18: To promote a co-ordinated approach to the provision of tall buildings through local area plans, strategic development zones and the strategic development and regeneration areas principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline.

1.4.1.2 Chapter 15 sets out North Lotts and Grand Canal Dock Planning Scheme and the Poolbeg West Planning Scheme in the context of the future development of the broader Docklands Strategic Development and Regeneration Area (SDRA). The need to promote/facilitate regeneration in the areas outside the immediate SDZs is acknowledged. Section 16.7 (p317) then sets out the approach to ‘Building height in a sustainable city’. This addresses the entire city, and includes the following text in relation specifically to taller buildings within SDZs:

“Planning applications will be assessed against the building heights and development principles established in a relevant LAP/SDZ/SDRA. Proposals for high buildings should be in accordance with the provisions of the relevant LAP/SDZ/SDRA in addition to the assessment criteria for high buildings and development plan standards.”
1.4.2 Strategic Planning and relevant legislative change in recent years

As the economic recession deepened, a housing crisis developed whereby the demand for housing outstripped supply and monthly rents rose dramatically, making it increasingly difficult for those on lower incomes to either purchase or rent residential property. In response, the Government published the ‘Urban Regeneration and Housing Act’ (2015) to help incentivise regeneration and address housing-supply issues though a ‘carrot and stick’ approach. Reduced development contributions were introduced to reduce the cost of built development, and a new vacant sites levy (an annual charge) aimed to prevent long-term hoarding of vacant land zoned primarily for residential development.

1.4.2.1 In 2016, the Government published ‘Rebuilding Ireland; Action Plan for Housing and Homelessness’. This included three ‘pillars’ of action, i.e. to address homelessness, accelerate social housing, and build more homes. The practical mechanisms to achieve the above were set out, with greater detail relating to the newer planning mechanisms. The role of a new Planning Regulator was set out, and a range of actions were set out for improving the rental sector, with emphasis on affordable rental and also delivery of student accommodation.

1.4.2.2 In the same year, the NTA published its ‘Transport Strategy for the Greater Dublin Area 2016-2035’. This comprehensive strategy includes a range of capacity enhancement measures, new routes and extensions to existing transport routes. The following objectives that are of particular relevance to the SDZ area; Metro North and Metro South and new Luas proposals. In regard to the latter, a new extension of the Red Luas Line to to Poolbeg is proposed. i.e. connecting the existing line through Docklands southwards across the River Liffey. No specific route has been published. An enhanced bus network is proposed, with core radial and core orbital routes planned, and Bus Rapid Transit (BRT) priority routes. The cycling network is planned as part of a detailed Cycle Network Plan, and walking is supported as a sustainable mode. Various measures and initiatives to support active travel and improved integration are also included. Some new proposals area included in the strategy, including a proposed road link to connect the southern end of the Dublin Port Tunnel to the south Port area.
At the time of writing, some progress has been made on developing both bus and Metro proposals, with a new 'MetroLink' proposal now building on Metro North/South (a preferred route has been identified) and also a new 'Bus Connects' Plan, currently at public consultation stage.

1.4.2.3 Then in 2018, ‘Project Ireland 2040’ and the ‘National Planning Framework’ (NPF) were both published, setting out a long term 20 year strategic framework for balanced regional development. The NPF succeeded the earlier National Spatial Strategy, focusing on the long term strategy for development including anticipated housing need and necessary supporting infrastructure. A series of National Policy Objectives (or NPOs) are included. Chapter 4, 'Making Stronger Urban Places', focuses on improving our towns and cities, making them more sustainable places to live and work, and regenerating them. Within this chapter, ‘performance based design standards’ are addressed. It states that planning standards should be flexibly applied to complex urban infill and brownfield sites because many current standards were devised for greenfield contexts. It also states that general restrictions on such matters as building heights and car parking can be replaced in urban areas by more appropriate performance-related criteria. This dynamic performance based approach will also enable the level of public transport to improve as more development occurs. The relevant NPO states

"NPO13. In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed, high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected."

At the strategic level, the NPF guides the development of new Regional Spatial and Economic Strategies (RSES) to replace earlier Regional Planning Guidelines, and in this regard the RSES for the Eastern and Midlands Region was approved in May 2019. This supports the goals of the NPF, particularly the National Policy Objectives contained therein, and encourage sustainable development and compact growth that is consistent with all recent statutory guidance. The RSES contains a
1.4.2.4 2018 saw the publication of “Sustainable Urban Housing; Design Standards for New Apartments – Guidelines for Planning Authorities” (March 2018). These followed earlier statutory guidance on residential development and urban design that pre-dated the SDZ.

The guidelines aimed to help encourage residential apartment development by providing a newly revised set of standards, such as floor areas, storage, amenity space etc., and emphasising the importance of ancillary requirements such as communal facilities and bicycle storage. The guidelines also enable a mix of apartment types, encourage refurbishment and urban infill schemes, and provide guidance on the 'build to rent' and 'shared accommodation' models. In addition, requirements for car-parking are reduced in some circumstances to encourage use of sustainable transport modes and to help promote apartment construction. These guidelines gave rise to a range of planning applications for revisions to previously approved schemes within the SDZ, and hence the guidelines are now being implemented.

1.4.3 Recent Government Guidelines on Building Height

1.4.3.1 With regard to the above strategic context, statutory guidelines for Planning Authorities on ‘Urban Development and Building Heights’ were published in December 2018 under Section 28 of the Planning and Development Act. These guidelines emphasise the need to move towards sustainable patterns of urban development and away from lower density urban expansion, particularly given the increasing demand for housing and related services, and concerns relating to negative environmental impacts. The guidelines hence seek a new approach based around stated performance criteria rather than generic limits or blanket height restrictions. This can help achieve more sustainable urban development and more compact city growth as sought under the NPF and RSES.
1.4.3.2 The guidelines highlight the potential of generic maximum height limits to undermine national policy objectives in some cases, resulting in unsustainable patterns of development rather than urban consolidation. The guidelines hence aim to address this concern, expanding on NPF requirements and setting new planning criteria for cities, suburbs and towns. Development Plans, LAPs, and SDZ planning schemes must become “more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights, whilst also being mindful of the quality of development and balancing amenity and environmental considerations” (Section 2.7). Paragraph 2.11 then promotes the identification of areas where a cluster of higher buildings can be accommodated.

1.4.3.3 Specific Planning Policy Requirements (SPPRs) are set out, and SPPR 1 supports increased building height and density in locations with good public transport. Local Authorities are to identify those areas in statutory plans, and…” shall not provide for blanket numerical limitations on building height”. SPPR2 then focuses on the need to ensure that appropriate mixtures of uses are provided for in statutory plans.

Section 3 of the Guidelines focuses on implementation of the new approach through the development management process. A set of specific criteria are provided, which must be met in planning application content, and these criteria are bracketed under headings relating to different urban scales; i.e. at the scale of the city, scale of the district/neighbourhood/ street, and scale of the site/building. Specific assessments may also be required to address such aspects as microclimate and the natural environment.

In relation to established SDZ planning schemes, the guidance is quoted hereunder, as set out in Specific Planning Policy Requirement 3 (or ‘SPPR 3’), Part ‘B’

“In the case of an adopted planning scheme the Development Agency in conjunction with the relevant Planning Authority (where different) shall upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate locations shall be articulated in any amendment(s) to the planning scheme.”

It is on foot of the above requirement, in the context of the guidelines, that the current review of building heights within the SDZ is being carried out.
2.1 An advertisement was placed in the Irish Independent newspaper on Friday March 22nd 2019 outlining the policy context for the Building Heights Review, and seeking submission of written comments or relevant information for consideration as part of the non-statutory review. This advert is reproduced below. Submissions could be received by email, standard post or submitted online via the Councils Consultation Portal at [https://consultation.dublincity.ie/](https://consultation.dublincity.ie/). All submissions received during the submission period, 22nd March-18th April were taken into account in this review.

By the end of the consultation period a total of 90 submissions were received, and whilst most submissions were in text-only format, some included attachments and detailed graphics for review.
All material submitted has been examined. Each of the 90 submissions has been numbered and summarised hereunder, and a response from the Development Agency (Dublin City Council) has been set out for each.

2.2 Submissions received

Submission 1
Empty submission (no content). No response required.

Submission 2
Support more height in the SDZ and recommends a minimum of 12 storeys in height. Submits that more supply will bring down the cost.

Development Agency Response;

The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Additional height commensurate with quality place-making provides an opportunity for additional residential and commercial space in the context of a planning scheme which is largely built out. The impact of increased supply on cost is difficult to determine given various market forces.

Submission 3
In increase in height would have a positive impact.

Development Agency Response;

It is acknowledged that increased building heights permissible can assist urban consolidation, and that the Planning Scheme SDZ is well located for public transport and services. Additional height provides an opportunity for additional space as part of a coherent urban structure.

Submission 4
Docklands should the main area for tall buildings in the city. That there should be no limit on heights and request quality ambitious designs for the area. That where heights are permitted, it should be stipulated that unit prices reflect the economy of scale and require public realm contributions as part of permission.

Development Agency Response;

In the interest of proper planning and sustainable development, additional heights in the SDZ must have regard to the existing context, height and scale in the area. The Development Agency recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Unit prices are generally subject to various market forces, and financial contributions on foot of planning permissions are standard.

Submission 5
Supports height of up to 14 stories in the area. Recommends a complementary building to the Capital Dock at City Block 9 and also supports Johnny Ronan’s Salesforce Tower
Development Agency Response;
In the interest of proper planning and sustainable development, additional heights in the SDZ must have regard to the existing context, height and scale in the area in accordance with the Guidelines and criteria contained therein. Block 9 is recommended for some focused additional height having regard to its position opposite Capital Dock and proximate to the Point Hub and commercial uses to the east.

Submission 6
Dublin Docklands is too bland and particularly on the south docks with dull uniform heights, wall and plain glass. There need to be an increase in height and increase in number of homes being built. Supports the proposed Whitewater centre in the north docks.

Development Agency Response;
The development of Dublin Docklands is based on a sound urban design solution that offers variety in urban form and height. Additional height provides an opportunity for additional residential and commercial space as part of a coherent urban structure in the context of a planning scheme which is largely built out. The Whitewater scheme is outside the SDZ boundary.

Submission 7
Heights should be increased dramatically. Existing limits are more suited to small towns.

Development Agency Response;
The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Additional height provides an opportunity for additional residential and commercial space as part of a coherent urban structure in the context of a planning scheme which is largely built out. The existing heights, which range from 5 storeys to 22 storeys, are more suited to small towns.

Submission 8
Docklands SDZ is restrictive and uninteresting and deserves prominent and beautiful buildings of note

Development Agency Response;
The development Dublin Docklands is based on a sound urban design solution that offers variety in urban form and height. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018

Submission 9
Docklands area would benefit from increase in overall height and should be applied only to residential developments. The quantum of residential planned for docklands is low and more residential development would make the area more attractive.

Development Agency Response;
The SDZ is only part of the Docklands area; the Poolbeg West SDZ, for example, will provide upto 3500 units on top of the 2600 units in this SDZ. This said, the docklands would benefit from more housing units and the agency will encourage residential developments in the SDZ as part of the mixed uses sought for the overall scheme. It is not a requirement to restrict taller buildings to residential uses, but the need for increased housing delivery is a key consideration in the review.
Submission 10

To avoid sprawl height should not be limited arbitrarily

Development Agency Response;

The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Additional height provides an opportunity for additional residential and commercial space as part of a coherent urban structure in the context of a planning scheme which is largely built out.

Submission 11

Docklands is suited for taller buildings, having good transport and many who live and work in the area without owning a car. Height limits are not required as building costs as height goes up, reach a natural equilibrium.

Development Agency Response;

The review is in accordance with the requirements of the statutory guidelines, and height requires definition because of potential impact on already developed areas, and because of the limited right of appeal once a scheme is made.

Submission 12

An increase in height would boost supply of residential uses. Companies are taking numerous buildings rather than one tall one, resulting in poorer design

Development Agency Response;

The scheme relates to an established urban grid and built context, and the review takes this as a starting point. Additional height provisions also create further opportunities for large corporate uses.

Submission 13

Building heights imposed by DCC is stifling growth and development of the city. The remaining undeveloped sites should maximise developments in terms of heights and in particular sites relating to residential accommodation. No height limit should be imposed for residential sites.

Residential should be encouraged in the area and should not include student accommodation. A higher standard of architecture should be sought on the remaining development sites.

Development Agency Response;

The docklands would benefit from more housing units and the scheme has set aside 50% of the area for residential developments in the SDZ. In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. The SDZ already includes criteria for Taller Buildings (Appendix 5).

Submission 14

The area is prime for high density apartment living and 5-8 storeys is inadequate. Need to remove current building heights.
Summary of submission

Streetscapes of 5-8 storeys provide the appropriate blend of density and liveability in most European cities. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Additional height in the SDZ provides an opportunity for additional residential and commercial space as part of a coherent urban structure in the context of a planning scheme which is largely built out.

Submission 15

Supports height and submits that developers should be made to have a minimum height of 10 stories in docklands. Also submits that 3000-5000 apartments need to be built here excluding ones that have planning permission and Poolbeg.

Development Agency Response;

The docklands would benefit from more housing units and the scheme sets aside 50% of the area for residential developments in the SDZ. In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. The heights review outcome will not be determined solely by any perceived requirement for a specific number of apartments, but by a range of relevant criteria.

Submission 16

More height and more height variation is needed, along with increased supply of apartments.

Development Agency Response;

Appropriate heights are examined with regard to existing built context in the context of the statutory guidelines and an established development framework that is largely built out. Height variation can assist with visual variety and can provide local landmarks as part of a coherent urban structure.

Submission 17

Docklands is appropriate for height. City needs densification around good public transport. Objectors should not be allowed to block high-rise in the area.

Development Agency Response;

The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. It is acknowledged that the extent of building heights permissible has an impact on urban consolidation, and that the Planning Scheme SDZ is well located for public transport and services. Additional height provides an opportunity for additional residential and commercial space as part of a coherent urban structure. Any objections or submissions received are considered as part of due process.

Submission 18

Increasing building heights are required for more sustainable living. The SDZ is overly restrictive on building heights and caters for limited locations. Docklands SDZ is the ideal location for increased...
building heights and density and the SDZ should be relaxed to allow much more mid-rise buildings and also allow for clusters of high-rise instead of the current landmark sites.

**Development Agency Response;**

The development Dublin Docklands is based on a sound urban design solution that offers variety in urban form and height. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Additional height at appropriate locations is considered, as part of a coherent urban structure.

**Submissions 19 & 20**

Height limitation to be removed. Building up is the answer to the housing crisis. The docklands should have over 100m tall buildings at strategic locations to enrich the city’s skyline. These building should be high quality.

**Development Agency Response;**

The docklands would benefit more housing units and the agency encourages residential developments in the SDZ as part of the mixed use approach. In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Appropriate heights are based on detailed study.

**Submission 21**

Taller buildings are needed. Supports more height to create an attractive skyline making an attractive city.

**Development Agency Response;**

In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Skyline impacts must be balanced against other planning parameters including shadow/amenity impacts.

**Submission 22**

Remove building height limits and every application should be judged on its own merits.

**Development Agency Response;**

In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. Applications cannot be assessed in isolation within the SDZ which has a pre-defined urban structure and clearly thought-out rationale, in order to provide increased certainty for both existing residents and investors.
Submission 23
Supports removing building height in the area. The area is perfect for high rise buildings and Dublin should embrace them. Submits that the small groups of objectors to development due to shadows/noise/privacy should not be listened to.

Development Agency Response;
In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. All submissions are considered as part of the process.

Submission 24
Remove building height limits. Every application should be judged on its own merits and to avoid ugly proposals

Development Agency Response;
In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. All submissions are considered in the appropriate policy context and visual impact is an important consideration assessed in accordance with the SDZ scheme.

Submission 25
Supports height. The higher the better and docklands is an ideal location for 15 storey building

Development Agency Response;
In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. It is considered that there is scope for additional height in appropriate locations, as part of a coherent urban structure.

Submission 26
Increase in height and density in the mainly non-residential part of the docklands and particular city block 9 will help support the economy. The provision of an adequately sized hotel and inclusion of a landmark tower is vital for the development of north docks.

Development Agency Response;
In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Having regard to existing context and the current status of the site, there is scope for some additional height in City Block 9. Land-uses are considered in context with regard to the existing scheme.

Submission 27
The area should allow for taller buildings and in return for height, the council should insist on better quality amenities with proper green area.
A park is needed in the area and the proposed pedestrian bridges over the River Liffey should be prioritised.

Development Agency Response;

In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. Additional height provides an opportunity for additional residential and commercial space in the context of a planning scheme, which is largely built out. The planning scheme offers green infrastructure solutions for the area including parks and aims to protect existing amenity.

Submission 28

Favours more height in the SDZ for the following reasons

- Providing sustainable housing and office
- Help with shortage of housing and provide housing close to employment
- Ensure sufficient settled population reside in the area
- Ensure increased public transport become viable due to increased population
- Avoid urban sprawl
- More varied style of architecture

Development Agency Response;

The SDZ is a mixed use planning scheme and is largely built out. This said it can accommodate more housing units in new residential developments as part of the mixed use approach. In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. It is acknowledged that the extent of building heights permissible has an impact on urban consolidation, and that the Planning Scheme SDZ is well located for public transport and services. Additional height provides an opportunity for additional residential and commercial space, and varied architecture is encouraged.

Submission 29

There should no set height restriction in the SDZ and the entire city area especially in post-industrial areas outside the historic core. A variety of building height and form would enhance the area.

Development Agency Response;

The development Dublin Docklands is based on a sound urban design solution that offers variety in urban form and height. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. There is scope for some increased variety of building height, subject to impact assessment.

Submission 30

Supports height in the area and suggest quality building heights of 20, 30, 40 plus stories. Submits height references from cities such as London, Paris, Copenhagen and Malmo.

Development Agency Response;

The development of Dublin Docklands is based on a sound urban design solution that offers variety in urban form and height. In the interest of proper planning and sustainable development, additional
heights in the SDZ will have regards to the existing context, height and scale in the area, and will consider relevant examples of best practice in other European cities.

Submission 31

Higher buildings are needed to reduce urban sprawl at the edge of the city, and to reduce commute times.

Development Agency Response;

The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. Additional height provides an opportunity for assist with city consolidation, but does not necessarily result in increased density, and this must be considered in relation to already developed areas.

Submission 32

Building heights are too low for this location. Outdated restricted height provisions need to be addressed.

Development Agency Response;

Appropriate heights are examined in this review, with regard to existing built context in the context of the statutory guidelines and an established development framework that is largely built out.

Submission 33

The cap on height is monotonous and there is need for varying building height so as to have a more interesting skyline.

Development Agency Response;

There is no blanket cap on height within the SDZ. In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. There is scope for adding variety to the city’s visual profile.

Submission 34

Supports additional height to combat the housing crisis and provide more office space.

Development Agency Response;

Additional height provides an opportunity for additional residential and commercial space in the context of a planning scheme which has a coherent urban structure and is largely built out.

Submission 35

There is need for high-density accommodation in the area to maximise the public transport opportunities. To build as high as you can in the docklands, that there should no restrictions on heights in the area.
Development Agency Response;

Additional heights in the SDZ will have regards to the existing context, height and scale in the area. The Planning Scheme SDZ is well located for public transport and services, and heights must be considered in regard to best practice criteria and the creation of an attractive liveable city neighbourhood.

Submission 36

Higher buildings are needed to allow for growth and reduce car traffic and rents.

Development Agency Response;

It is acknowledged that the extent of building heights permissible has an impact on urban consolidation, and that the Planning Scheme SDZ is well located for public transport and services. Additional height provides an opportunity for additional residential and commercial space as part of a coherent urban structure, and in the context of a planning scheme which is largely built out.

Submission 37

DCC should lift the height restrictions in Docklands. To focus on building upwards of 20/30 storey buildings. There should also be focus on residential and restrict further student accommodation or offices in the area. Where planning is submitted for offices/student accommodation, the development should also contain a minimum of 50% floor space for residential.

Development Agency Response;

The development Dublin Docklands is based on a sound urban design solution that offers variety in urban form and height. The agency will encourage residential housing and in the interest of proper planning and sustainable development, and additional heights in the SDZ will have regards to the existing context, height and scale in the area. Additional height provides an opportunity for additional residential and commercial space in the context of a planning scheme, which is largely built out, and the ratio of residential to commercial is not generic but adjusted to specific City Block contexts.

Submission 38

Allow increased heights in Dublin city particularly in the SDZ. More units of housing/office/hotel rooms can fit in taller buildings and increased in supply will reduce cost over time. Increased height will tackle urban sprawl and people prefer to live close to employment centres.

High-rise in some locations is not a threat to maintaining Dublin’s low rise. There should be affordable housing available for people who want to live in the city. It is submitted that taller buildings does not inherently detract from the character of an area and that tall buildings can be admired landmarks. The SDZ is an appropriate location for higher buildings.

Development Agency Response;

In the interest of proper planning and sustainable development, additional heights in the SDZ must have regard to the existing context, height and scale in the area. Additional height provides an opportunity for additional residential and commercial space in the context of a planning scheme, as part of a coherent urban structure which is largely built out. This will help consolidate the city sustainably. The impact of taller buildings is assessed in accordance with urban design criteria.
 Submission 39

Supports the review of building heights in Dublin and submits that taller buildings are better particularly now, that there is a housing crisis. A lot can be learnt from Berlin model of commerce on the ground floor and residential units above between 6 to 12 floors.

Development Agency Response;

Additional height provides an opportunity for additional residential and commercial space in the context of a planning scheme, which is largely built out. The existing scheme generally seeks active or non-residential ground floor uses, and delivery of such has been successful to date. The review takes into account examples from other European cities, some of which also have housing issues.

 Submission 40

Allow for higher rise buildings for residential and commercial purposes. To build more parks and cycle lanes. To look at Berlin and copy what they have done.

Development Agency Response;

Additional height provides an opportunity for additional residential and commercial space as part of a coherent urban structure in the context of a planning scheme which is largely built out. The existing scheme includes a strategy for open space and the delivery of parks spaces is ongoing. The review takes into account examples from other European cities, some of which also have housing issues.

 Submission 41

Higher density allows for higher population and an improved housing market.

Development Agency Response;

It is acknowledged that higher density helps reduce sprawl, and that the Planning Scheme SDZ is well located for public transport and services. Additional density provides an opportunity for additional residential and commercial space in the context of a planning scheme which is largely built out. Sustainable densities can be achieved in the 6-8 storey urban structure with considered taller buildings.

 Submission 42

Summary of submission

Supports additional height in the SDZ. There is a need to increase the density of the city, accommodating more of the population and reducing sprawl.

Development Agency Response;

It is acknowledged that higher density helps reduce sprawl, and that the Planning Scheme SDZ is well located for public transport and services. Additional density provides an opportunity for additional residential and commercial space in the context of a planning scheme which is largely built out. Sustainable densities can be achieved in the 6-8 storey urban structure with considered taller buildings.

 Submission number 43

Notwithstanding the need for public transport and sustainable travel, there is also a need for car parking.
Development Agency Response;

Whilst the primary aim of the building heights review is not a review of car parking per se, the need for some limited car parking provision, in the context of sustainable transport, remains relevant. It remains the case that parking provision is evaluated in accordance with development plan standards.

Submission 44

There is a need to increase the density of the city, accommodating more of the population and making it feasible for many to live near their workplace, and also boosting investment. There is little historical character in the area.

Development Agency Response;

It is acknowledged that higher density helps reduce sprawl, and that the Planning Scheme SDZ is well located for public transport and services. Additional density provides an opportunity for additional residential and commercial space in the context of a planning scheme which is largely built out. Sustainable densities can be achieved in the 6-8 storey urban structure with considered taller buildings. There is ample historical character in the area, for example; historic warehouses, mill buildings, pubs, a railway station and historic quay walls.

Submission number 45

Need to move away from 9-5 neighbourhoods.

Development Agency Response;

The existing Planning Scheme already avoids ‘9-5’ neighbourhoods. This is achieved by implementing a required land-use ratio within each city block. Residential (and supporting) uses are sought throughout the scheme, ensuring that some activity remains in the public realm after dark. It is intended to retain this approach such that the area has a balanced mix of uses.

Submission number 46

Need to abolish height limits and to construct 100m+ towers. These would effectively make the skyline of Dublin.

Development Agency Response;

In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area, and the content of statutory guidance which require a review of heights. Consideration of scale is important given that the scheme is largely built out. The impact of taller buildings is assessed in accordance with urban design criteria.

Submission number 47

Need or increased density to prevent sprawl. Need to go up in height.

Development Agency Response;

Sustainable consolidation of the city is required and achieving appropriate densities is key to this. The existing scheme set down a defined urban structure and additional recommended heights have regard to existing built context and related impacts.
Submission 48

Supports high density to ease homelessness and reduce commuting times

Development Agency Response;

It is acknowledged that density has an impact on urban consolidation, and that the Planning Scheme review provides an opportunity for additional residential and commercial space. Density and height are considered in the context of a planning scheme as part of a coherent urban structure and which is largely built out.

Submission number 49

Market rates will drop significantly if height restrictions are removed.

Development Agency Response;

Whilst this study does not analyse market rates and how they may respond to changing policy on building heights (and there is evidence of both supply and residential property prices increasing in the past), provision for some taller buildings as part of a coherent urban structure, will enhance supply of residential and office uses.

Submission number 50

There should be no height limit

Development Agency Response;

The guidelines seek a critical re-evaluation of current policy to ensure adequate consideration of guidance criteria. This is with a view to ensuring an approach that ensures sustainable urban consolidation. In this case, the SDZ is largely built out and therefore impacts on existing developments, residents and businesses, is an important consideration.

Submission number 51

There ought to be minimum height limits. Visual impacts of development should be considered.

Development Agency Response;

The current planning scheme sets out maximum and minimum heights (page 173-174). These have been realised in almost all developments within the scheme to date, largely due to market forces operative in this very central location. Where permissible under the scheme, additional set-back floors have also been granted permission in many cases.

Assessment of visual impact is already a requirement, with chapter 5 setting out a range of requirements for new buildings. This is in addition to shadow studies to evaluate impact on amenity. Amendments to the scheme are subject to similar study and requirements.

Submission number 52

12 stories should be the norm. The 88m limit on landmark buildings is too low, should be 100m.

Development Agency Response;

The Development Agency is reviewing the current planning scheme in the context of statutory guidelines. Imposing a new uniform ‘norm’ is potentially problematic having regard to various urban
design criteria, including block size, street widths, shadow impacts, and visual impact. Changes to permissible heights are not on the basis of an arbitrary blanket height, but are the result of critical evaluation, taking into account the nature of built development to date. The potential for landmark buildings is re-evaluated, allowing for some new landmark buildings at appropriate locations, supplemented by some new 'local landmarks' with potential to provide successful visual punctuation without undermining the status of the taller landmark buildings.

Submission number 53

Stunting height has a negative impact on competitiveness. Land is limited and commute times for workers are excessive.

Development Agency Response;

It is accepted that land is limited and in high demand in the SDZ due to the success of the Planning Scheme to date. Re-evaluation of height is therefore being carried out as per Statutory Guidance, and some taller buildings are recommended. The mix of residential and employment uses is part of the policy to minimise commute times.

Submission 54

Height should be in the range of 12-15 storeys.

Development Agency Response;

Appropriate heights are examined in the review with regard to existing built context in the context of the statutory guidelines.

Submission 55

Height limits should not exist and 100+ metre high buildings should be permitted.

Development Agency Response;

Appropriate heights are examined in this review with regard to existing built context in the context of the statutory guidelines and an established development framework that is largely built out.

Submission number 56

DCC should seek taller buildings on a portion of each city block. The main objection often expressed against increased heights is that they would impact on Georgian Dublin or on historic buildings such as Trinity College, Christ Church Cathedral etc. London, Paris, New York and Barcelona all have modern tall buildings close to historically important buildings and monuments. New developments need to have high densities to achieve an increased overall average density across the city. Georgian Dublin is not representative of the population at large, either now nor in the past, and there would be no significant impacts from new areas of taller buildings. In addition, impacts of redevelopment on communities has been largely positive, though improved public transport, educational facilities, and retailing. The Dodder Bridge and DART underground will only improve access to a higher level. A high level open space through the area (similar to Manhattan’s High-line elevated park) could enhance the amenity of the area. Developers could be incentivised to build residential development.

In regard to design, courtyard developments (or perimeter blocks) could be replaced by tower designs, increasing amenity to the street. In regard to cost of development, there are clearly economies of scale with taller residential development that can be passed on to the apartment buyer,
based on the idea that a smaller profit margin per unit can yield greater overall profit if the number of
units being provided is increased as a result of greater height.

In relation to landmark buildings, Capital Docks is disappointing in design terms. Such landmark
buildings should be appropriately designed and quality external materials should not be compromised.

**Development Agency Response;**

It is accepted that some city blocks have potential to accommodate taller buildings or taller elements
as part of larger buildings. Block size, configuration and impact on streetscape are all considerations
and therefore some blocks cannot accommodate additional height when the planning scheme layout
is fully considered. It is accepted that the relevance of Georgian Dublin to this area is limited and that
access to the area is an important consideration. The scheme is not suited to the provision of a high
level amenity such as the Highline, as City Block layout and public realm is largely predetermined by
the original scheme. In relation to tower designs with increased amenity, there is no scope for
comprehensive deviation from the planned block layouts towards point blocks in parkland. This is
because of the established urban structure which has evolved over 20 years, which allows for a
hybrid approach, with taller buildings at key locations.

In regard to the design of landmark buildings, built design is a function of both policy and
implementation, and the planning scheme encourages quality design. It is accepted that such
landmark buildings require close attention to architectural quality.

**Submission number 57**

Dublin needs buildings way over 100m in the Docklands, and a minimum height of 10-12 storeys.

**Development Agency Response;**

The heights are determined by consideration of key criteria from the guidelines related to appropriate
urban design.

**Submission number 58**

Increased heights are required, and landmarks buildings to date are unimpressive. They all lack visual
interest, reflecting a planning bias towards safe but dull developments. Genuinely interesting
landmark buildings look more like those in this submission (graphics attached to submission illustrate
montage images of landmark buildings, all approx. 3-6 times higher than buildings around them)

**Development Agency Response;**

Whilst the current scheme allows for landmarks at hubs, it is accepted that there is scope for some
reconsideration of visual punctuation for both the hub areas and at some areas with potential for local
landmarks without impacting negatively on amenity.

**Submission 59**

This area is well placed for higher buildings, both commercial and residential. Good transport and
public realm required.

**Development Agency Response;**

Heights are reviewed in accordance with statutory guidelines and the mix use remains for both
residential and commercial uses. The area is well served by sustainable transport and new public
realm in the SDZ is largely delivered or already permitted, including parks and other public realm enhancements.

Submission 60

Higher densities required to help address the housing crisis, and higher buildings are part of the solution.

Development Agency Response;

Appropriate heights are examined with regard to existing built context in the context of the statutory guidelines and an established development framework that is largely built out. Some additional height will work in conjunction with planned densities.

Submission number 61

The 2014 scheme is a legally binding contract between the developers, the local Council and the local community. It is comprehensive, well-informed, and coherent. An Bord Pleanala’s decision at the time emphasised the merits of the scheme in regard to land uses, flexibility, balance of residential and business, regeneration, etc. Therefore, to only study height is ill-conceived, taking away certainty. The scheme is largely built out, and therefore the balance will be disturbed. There may be legal implications. The modifications to the original scheme, as made by the Board, should remain applicable, as they sought to maintain the residential amenity of pre-existing properties on Mayor Street (5.5.2b). SPPRs should not override such considerations. The Guidelines introduce uncertainty in relation to contractual responsibility. The only way to resolve the matter is through a full review of the SDZ as per part IX of the Planning Act, and associated Oral Hearing with An Bord Pleanala.

Development Agency Response;

It is agreed that the original planning scheme was the product of much consultation and consideration. Notwithstanding this fact, the Development Agency (DCC) now has an obligation to implement the new guidelines and this requires a review of the planning scheme. The fact that the scheme is largely built out is taken into account, and the SDZ area has been surveyed to ascertain the current status of projects. It is intended to have full regard to impacts on amenity in implementing SPPR 3. Whilst it is acknowledged that there is a degree of uncertainty pending the outcome of the review, this cannot be avoided, yet the duration of this period is being minimised insofar as possible. It will be for An Bord Pleanala to determine if a full review of the SDZ is necessary, or indeed if there are other procedural requirements on foot of planning legislation.

Submission number 62

The review should not be limited to height only. Social integration and regeneration will not be achieved in the area around Mayor Street Upper with such high rents and a transient population. For DCC to now change the rules suggests that the process of preparation of the SDZ was a waste of time. It is not conducive to residential living to have Luas starting at 5.30 AM and developers working to 4 AM. Monitoring disamenity is of little use if residents then need to take court proceedings to resolve matters. Objective LU5 failed to deliver defensive space as required.

Development Agency Response;

The Development Agency (DCC) has a statutory obligation to implement the new guidelines and this requires a review of the planning scheme. The use mix of the existing scheme ensures that residential development and businesses provide a balance in the area, and the vast majority of the scheme has
been built out or is under construction. Amenity considerations are taken into account in the review process and in accordance with the guidelines. It is not proposed to change LU5 in the review, an objective which encourages own front doors and defensible space.

Submission 63

Existing SDZ requirements are overly restrictive, and loosening these will help alleviate the current housing crisis, provide additional commercial space, and prevent additional urban sprawl

Development Agency Response;

Appropriate heights are examined with regard to existing built context in the context of the statutory guidelines and an established development framework that is largely built out. Sustainable development and city consolidation will help reduce sprawl. Some additional height will provide for both residential and commercial development.

Submission number; 64

On line polls show support for high rise (80-90% approved of the Tara Street decision)

Development Agency Response;

The height review must take consideration of the urban framework into which any tall buildings will integrate and environmental impacts anticipated. Sites vary in regard to development constraints, and potential impacts on amenities. Additional height is accommodated where possible.

Submission number 65

North Wall Community Association

In 2013 it was assured that the plan would be fully inclusive, and that the strict requirements of the SDZ (including 10% social housing) would be fully implemented. This was not to be however, and now it is considered that the increased heights will bring no benefits to the indigenous community.

Development Agency Response;

Whilst social housing may not always be provided on the immediate site it is nevertheless provided in the general area in accordance with relevant legislation.

A recent social and community audit update showed significant improvements in facilities in the area, and new retailing, community facilities, and public amenities have been provided. As the scale of the residential and business community in the area increases, so will supporting facilities in accordance with Development Plan and SDZ requirements.

Submission number 66

The SDZ needs to be reviewed in its entirety, not just height. The legality of the review is questionable, given that the SDZ is a legally binding contract. For any new height, shadow and light studies would be required, and assessment of any impacts on the community. The negative impacts on amenity of development to date will get worse if additional height is allowed. No new accommodation will be provided for the local community. There has been no community gain. An oral hearing is requested.
Development Agency Response;

It is agreed that the original planning scheme was the product of much consultation and consideration. Notwithstanding this fact, the Development Agency (DCC) now has a statutory obligation to implement the new guidelines and this requires a review of the planning scheme. Additional height will be proposed at appropriate locations where it will not have any significant adverse impact on amenity. A recent social and community audit update showed significant improvements in facilities in the area since 2014. It is a matter for An Bord Pleanala as to whether to hold an oral hearing, having regard to the significance of the amendments proposed.

Submission number 67

Emphasises the importance of providing high quality and sustainable office space for major corporates. Reference is made to elements of the existing planning scheme and the new guidelines, listing out the criteria for assessing higher buildings. There is scope for additional height in some areas. Quayside precincts are recommended- ie an area up to 100m back from the river. Existing buildings, coloured grey, should also be included in the review. Some existing buildings are remote from coded areas and there is a lack of clarity as to what would be acceptable maximum heights for these. In addition, some recently developed sites may still be considered ‘grey’ lands - ie subject to prevailing heights. These areas need to be reconsidered, as failure to address this may result in greater height being achieved outside the SDZ boundary that within it (in some instances). This would be a missed opportunity.

Visual variety is needed along the quays to avoid a boring uniformity of height. Text in section 5.4.5 of the scheme, which allows for a setback additional level, may be amended to allow for 4 additional commercial or 5 additional residential levels along quayside precincts, subject to assessment under development management criteria.

Fig 4 of the city development plan includes an illustrated key view/prospect that includes part of the western edge of the planning scheme including an area of quayside to the west of it. The review could reconsider this.

Development Agency Response;

Whilst areas in close proximity to the quays include very accessible sites close to public transport, providing additional height without consideration to surrounding areas is not appropriate. Any proposed additional height is analysed with regard to the original and established urban structuring principles including the significant of hub areas in the context of development to date, with particular emphasis on undeveloped sites. The suggested addition of 4-5 additional storeys in such quayside areas would be somewhat arbitrary given the potential impacts over and above existing height allowances. An evidence based approach is required.

In relation to ‘grey lands’, these are also considered in the review. It is acknowledged that reference to them in the existing scheme requires some re-evaluation given the changing height context.

Figure 4 of the development plan (p63) illustrates an indicative view/prospect that does not impact in any significant way on buildings within the SDZ area.

Submission number 68

Refers to much of the content of the Guidelines and recommends that maximum heights must be established. The potential of the area could be achieved through increased heights at quayside precincts (100m from the river). Sites already developed should be included in the review, because otherwise lands outside the SDZ could achieve greater heights and this would be inconsistent.
Up to 4 additional commercial storeys, or 5 residential, could be considered in these quayside precincts.

The illustrated views in Fig 4 of the City Development plan could be considered in regard to its impact/appropriateness.

**Development Agency Response;**

Whilst areas in close proximity to the quays include very accessible sites close to public transport, providing additional height without consideration to surrounding areas is not the appropriate way forward. Any proposed additional height is analysed with regard to the original and established urban structuring principles including the significant of hub areas in the context of development to date, with particular emphasis on undeveloped sites. The suggested addition of 4-5 additional storeys in such quayside areas would be somewhat arbitrary given the potential impacts over and above existing height allowances. An evidence based approach is required.

In relation to ‘grey lands’, or sites already developed, these are also considered in the review. It is acknowledged that reference to them in the existing scheme requires some re-evaluation given the changing height context.

Figure 4 of the development plan (p63) illustrates an indicative view/prospect that does not impact in any significant way on buildings within the SDZ area.

**Submission number 69**

The entire SDZ needs an overhaul, and the legislation does not allow for the proposed review. A full impact analysis is required for heights to be reviewed, and loss of amenity should be studied in detail. Affordable accommodation for city workers is required, the current approach is not sustainable. Impacts on existing light for residents of Mayor street and New Wapping Street is required, as less light may mean higher heating and maintenance costs.

**Development Agency Response;**

The review is required by ministerial guidance which has a statutory footing. Additional height in selected locations can help add to existing housing stock. Consideration of impacts on amenity is a key part of the review, having regard to established urban design practices and the criteria set out in the guidelines. The guidelines on apartment standards are also relevant in that they allow for a variety of unit sizes including studios and shared living for key workers.

**Submission number 70**

A comprehensive lighting study is necessary as the studies to date for the SDZ were for buildings up to 8 storeys only. Also, the SDZ is a legally binding contract and changes therefore require renegotiation. A supply of rental accommodation only will not create a sustainable local community. An oral hearing is requested.

**Development Agency Response;**

The study re-evaluates shadow impacts at City Block level for any changes to building heights, and each planning application must be accompanied by relevant shadow analysis (see p 174/5 of the scheme). It is not proposed to amend this.

Additional residential development would not be restricted to rental only in the planning scheme. It is a matter for An Bord Pleanala as to whether to hold an oral hearing, having regard to the significance of the amendments proposed.
**Submission number; 71**

Increasing height should improve the potential for green space at ground level. This helps create balance. By limiting the height of our buildings, we limit our ambition for the city.

**Development Agency Response;**

Significant green space at ground level is largely determined by the City Block Structure and related public realm in the original scheme. Increasing height does not necessarily result in increased open space delivery. A ‘trade off’ between height and open space does not necessarily result in higher densities. The microclimatic impact of taller buildings on adjoining spaces must also be considered.

**Submission number 72**

The entire SDZ needs an overhaul, and the legislation does not allow for the proposed review. Also, the SDZ is a legally binding contract and changes therefore require renegotiation.

A comprehensive lighting study is necessary as the studies to date for the SDZ were for buildings up to 8 storeys only. Impacts on existing light/amenity is required. A supply of rental accommodation only will not create a sustainable local community. There has been no community gain. An oral hearing is requested.

**Development Agency Response;**

The review is required by ministerial guidance which has a statutory footing. The study re-evaluates shadow impacts for any changes to building heights. Additional residential development would not be restricted to rental only in the planning scheme. It is a matter for An Bord Pleanala as to whether to hold an oral hearing, having regard to the significance of the amendments proposed.

**Submission number 73**

Submission on behalf of landowners with 2 properties in Block 11 (A and C) of the scheme. The company is involved in residential development and welcomes the review.

Agrees with content of SPPR1 and seeks a pro-active response to the guidelines, recognising the merits of the docklands area in regard to sustaining increased heights to meet requirements including national policy objectives and RSES objectives. Accommodating additional population growth and sustainably consolidating the city are key goals. Now office demand is high and international companies seek both office and accommodation space for workers who seek to rent and do not own cars. This points to densification.

Extra commercial capacity is required in this area which is identified in the MASP/RSES. The requirement for set-backs is limiting (e.g. block 11), and it is suggested that additional heights on corner blocks could be appropriate to an architectural response without setback. At least 11 storeys should be allowed on Block 11 to allow for a local landmark. Provision for local landmarks buildings in the scheme was removed by ABP because they could compromise urban design. However, they could be reinstated having regard to recent guidance.

The site at the corner of Lime Street and Sir John Rogersons Quay has a permission for a 5 storey plus setback onto Lime St, and 8 storeys fronting Sir John Rogersons Quay (SJRQ). The site at the corner of Lime St and SJRQ has potential to be a commercial node point (Block 11 A), but has limited visibility due to the protected structure on site and the nearby campshire buildings. An increase in height of 4 storeys would create a local landmark, breaking the established shoulder height, and could provide food and beverage services.
For the remainder of block 11, the current height allowance is 6 storeys plus setback. A baseline of at least 8 storeys should be provided for.

In summary; Lime St Commercial should be 10+1 storeys, with residential at 8+1 setback. The submissions is accompanied by a series of graphics illustrating/explaining the areas described.

Development Agency Response;

It is recognised that there is now increased demand for both residential and business uses in the area. The review hence seeks opportunities to add a relatively high density of sustainable mixed use development, provided for in the current scheme.

In relation to the request to allow increased heights on corner blocks without the requirement for setbacks, the rationale for setbacks is reasonable based on potentially negative amenity impacts on existing nearby developments. It is accepted that the concept of local landmarks could add variety to the overall scheme without compromising the significance of the main landmark buildings, and the locations of these need to be carefully thought out. This considered, additional height at the corner framing the Liffey Campshires may be considered, which allow for some visual modulation. In relation to the desired 8 plus additional setback for the remainder of the block, this is not accepted given the limited dimensions of the site and the need to ensure quality amenity within and around the courtyard. Secondly, the potential impact on existing residences on the western side of Lime Street would be problematic given limited street width, visual overbearing and significant overshadowing.

Submission number 74

The relevant legislation does not allow for the proposed review. Also, the SDZ is a legally binding contract and changes therefore require renegotiation afresh. The potential illegality of the process could give rise to an enormous public bill. As a resident, the negative impacts on existing light/amenity and quality of life would be high.

A supply of rental accommodation only will not create a sustainable local community. There has been no community gain.

Rental only accommodation does not give rise to sustainable communities. An oral hearing is requested in order for real engagement to take place.

Development Agency Response;

The review is required by ministerial guidance which has a statutory footing. The study re-evaluates shadow impacts for any changes at city block level. Additional residential development would not be restricted to rental only in the planning scheme. It is a matter for An Bord Pleanala as to whether to hold an oral hearing, having regard to the materiality of the amendments proposed.

Submission number 75

The SDZ is a legally binding contract between the Community, the developers and the Local Authority, and changes therefore require renegotiation afresh, with a comprehensive analysis, rather than cherrypicking some areas.

As a 4th generation local resident, the negative impacts on existing light/amenity and quality of life would be high. There are serious concerns over rental-only accommodation offered by non-resident landlords. A supply of rental accommodation only will not create a sustainable local community.

Amending building heights could have a negative impact on resident's amenity and on home and family life. An oral hearing is requested in order for community voices to be heard.
Development Agency Response;

The review is required by ministerial guidance which has a statutory footing. It is comprehensive in this context, and selected locations for additional height rationally selected on the basis of established urban design principles rather than randomly ‘cherrypicked’.

The study re-evaluates shadow impacts for any changes to building heights and considers potential amenity impacts, including those on existing residents. Additional residential development would not be restricted to rental only in the planning scheme. It is a matter for An Bord Pleanala as to whether to hold an oral hearing, having regard to the materiality of the amendments proposed.

Submission number 76

The review is welcome as all stakeholders can express their views. Salesforce has announced significant expansion in Dublin, hiring 1500 staff over the next 5 years. Previous correspondence seeking greater building height relates (letter submitted on file reference DSDZ2088/19).

400,000 sq ft is required in a single location, and there are very few options available. This size, with everyone under one roof ensures a company culture and collaboration that is critical for success. Other cities such as Tokyo and Chicago offer numerous options for such scale. Increasing heights in a controlled manner will have a positive impact on Dublin’s competitiveness into the future.

Development Agency Response;

The heights review is in accordance with the procedures outlined in statutory guidance insofar as they apply to the original scheme, taking consideration of the extent of built development to date, and the needs of the city.

Whilst industrial or market requirements for particular floor areas may be relevant to a particular company, provisions for additional height in the review are determined based on specific criteria and urban design/amenity considerations. The Planning Scheme provides for flexibility with regard to floorplate size which may include links between any city blocks to accommodate large occupiers. This review indicates potential for setback floors and a local landmark on the Liffey frontage to mark the northern end of the proposed New Wapping Street pedestrian bridge.

Submission number 77

This submission, on behalf of Kennedy Wilson, comprises a Planning Report supported by an Architectural design brochure, a sunlight & daylight analysis, a visual impact assessment and an ecological statement.

The submission seeks to adjust the Development code for City Block 3 to facilitate more modulated residential and commercial height by providing for:

1) Block 3A/3B; three residential pop-up buildings on the Sheriff Street frontage, between 2 and 4 storeys over the SDZ shoulder height of 7 storeys(plus one setback), with localised setbacks on south side of blocks to allow more light penetration. One of the buildings to mark corner of New Wapping Street and Sheriff Street.

2) Block 3E/3F; An extra 2-3 storeys on two commercial blocks fronting Mayor Street, with a reduced shoulder height of 5 storeys to Mayor Street/Castleforbes Street and the park, and localised setbacks.

3) Block 3D; Reduction in height of terrace to two storey, compared to SDZ up to six storey residential subject to fine grain.
It is submitted that these proposed heights are non-material in the context of the overall SDZ scheme; that they are similar to heights being achieved outside the SDZ (e.g. the 11 storey building at East Road on the opposite side of Sheriff Street) and are consistent with emerging trends to provide more sustainable development patterns. It is submitted that the proposal is not a “blanket” solution, but responds to the existing scale, acknowledges the street hierarchy, provides a more valued streetscape, and improves employment and housing delivery.

The sunlight and daylight analysis concludes that the impact of the proposed height changes is likely to be similar to that in the current SDZ scheme. The Visual Impact Analysis concludes that the proposal is not likely to result in significant visual impacts and is consistent with the overall policy for height in the Docklands. The ecological statement considers that the changes would not materially alter the outcome of any AA screening exercise.

Development Agency Response;

City Block 3 remains largely undeveloped, apart from an apartment building at the northeast corner and a two-storey terrace fronting New Wapping Street. It is noted that there are 3 10/11 storey residential buildings at street junctions on Sheriff Street, which add variety and modulation on this long street. Having regard to the overall SDZ height review, it is considered appropriate to provide for two local landmark residential buildings, at the north side of Blacks 3A and 3B. It is important that these buildings read as vertical modulations to the main streetscape, as depicted in the Architectural brochure.

In relation to Block 3E/3F, it is noted that, as with a number of commercial blocks, the central courtyard indicated in the SDZ scheme (figure 35) is generally taken up by additional office floorspace. In this case the proposal is for up to 100% site coverage, with up to three extra commercial storeys proposed, set back progressively from the shoulder edges. As set out on Page 175 of the SDZ scheme, figure 35 provides the city block ‘envelope’ within which the building is designed having regard to good architecture, daylighting, amenity etc. Given that Block 3F is surrounded on three sides by existing occupied development with a proposed civic park to the North West, it considered appropriate to allow for up to two/three extra setback commercial storeys, subject to assessment at Planning Application stage.

With regard to Block 3D it is agreed that the residential development to the rear of the New Wapping Street should been in the form of 2/3 storey townhouses to provide transitional scale to the taller blocks to the east. Given that Figure 35 refers to maximum heights, there is no need to introduce a new lower height band.

Submission number 78

Building upwards allows more green space and prevents the need for demolition and rebuilding later on. We need more homes and a sustainable city. One or two buildings of significant height should be encouraged (i.e. over 100m). Salesforce should have the opportunity to have a tower building. We need a vision for the city. It is a shame that Metrolink does not loop through Docklands.

Development Agency Response;

Building upwards does not always ensure additional green space. There is an established urban framework into which new buildings must integrate. The review reconsiders opportunities for additional height by way of new landmarks on appropriate sites. The vision for the City is set out in the Development Plan and refined in the SDZ planning scheme. The building heights review does not afford opportunities to review strategic public transport.
Submission number 79

Supports higher density including changes to heights, as these are supported by the NPF and new Height Guidelines. Supports specific precincts where increased height is actively encouraged. The SDZ is an appropriate location for intensification, and the Chamber aims to promote policies that enhance competitiveness.

Development Agency Response;

The building heights review recognises the sustainability of the SDZ location and identifies additional height in accordance with the Guidelines having regard to relevant assessment criteria and good place-making.

Submission number 80

Dublin Chamber is in favour of greater height in the North Lotts and Grand Canal Dock SDZ to maximise the finite amount of development land in the core city centre and to help deliver high density living in a well serviced area close to the City Centre with high quality transport links.

It is recognised that a significant amount of height has already been introduced successfully e.g. Google (15 storey) Montevetro (15 storey), Boland Mills (3 x 15 storey) and EXO (17 storey). While recognising that height is not the only means of achieving core density, the Chamber has long argued that height in the appropriate location, allied with quality public realm and a variety of uses such as at Grand Canal Dock, is essential to good place making.

Office space is in high demand in the area; Q1 2019 saw the highest uptake to date; this will also necessitate further housing capacity.

In relation to wider policy impact, the Chamber expresses concerns around potential blockages to the implementation of the height guidelines at local authority level. If this review fails to increase limits, it does not bode well for the implementation of the new guidelines by local authorities, or the Metropolitan Area Spatial Plan (MASP).

Development Agency Response;

The submission of the Chamber of Commerce is noted. The review takes on board the NPF, the RSES, MASP and the Guidelines for Height, having regard to the successful urban structure provided to date in the docklands. The commercial floorspace for which Planning Permission has been granted has already exceeded that provided for in the 2014 SDZ Scheme. The agency fully supports the principles of place-making and that well planned taller buildings can contribute to the identify and character of the docklands.

Submission number 81

Height and density should be maximised in order to encourage and support Foreign Direct Investment. FDI- linked employment is at an all-time high in Ireland and a major source of income. The planning scheme should be as flexible as possible in order to facilitate the requirements of these companies. Additional height would help capitalise on existing success and help implement the NPF and the three SPPRs are supported. Clustering of higher buildings should therefore be supported.

The 6-8 storey general limit should be re-investigated to maximise opportunities, and the planning scheme should be amended as soon as possible.
Development Agency Response;

The Development Agency recognises the significance of increased height for FDI, and acknowledges the achievements to date in the SDZ in regard to delivery of foreign investment and related employment. Additional height is sought in a balanced and sustainable mixed-use environment, incorporating business, residential and supporting uses, as an integral part of good place-making.

Submission number 82

This submission on behalf of Cosgrave Property group, relates to a 0.055 Ha site on the north side of Ringsend Road, City Block 19 of the SDZ. The Site is currently occupied by a 4-storey red brick apartment block, built in the late 20th century.

The submission is accompanied by a building height capacity study and a series of photomontages showing a 9 storey and a 10 storey option for the site. It is submitted that the site and the area can accommodate a 9/10 storey building for the following reasons:

1) The sites key gateway location on the Block 19 peninsula, the SDZ, and proximity to the City Centre
2) Its position fronting both a city street and the Dodder waterfront
3) Its current poor contribution to the townscape, which could hinder the development potential of nearby sites, including the graving dock sites.
4) The site has no protected views in the SDZ, despite its proximity (65m) to St Patricks Church. It will neither screen nor crowd the church.

Development Agency Response;

Camden Lock forms part of a larger relatively modern apartment scheme at the southern end of Block 19. It is not identified as a development site as shown on Figure 2 of the approved scheme – indeed over half of the SDZ land area comprised sites which were already developed. The purpose of the SDZ scheme was to provide a coherent framework for the development of the vacant lands.

The implementation chapter of the SDZ Scheme 2014 (Chapter 6, p223) contains a provision for the planning assessment of height previously developed sites viz.

“In relation to height, any new building or additional height to existing buildings shall relate to the prevailing height as set out in the relevant City Block or adjacent blocks in the development code.”

It is proposed to amend this provision to take account of the National Guidelines on Urban Development and Building Heights viz:

“In relation to height, any proposed new building replacing an existing building, or additional height to existing buildings shall be assessed having regard to the policies and criteria in the National Guidelines on Urban Development and Building Height 2018 in the context of the approved amended SDZ Planning Scheme.”

Submission number 83

This submission, made on behalf of Cosgrove Property Group, relates to a 0.07 Ha site on the west side of Ringsend Bus Garage. The site is occupied by a 3 storey art-deco style building, constructed in the 1930’s for the Dublin United Tram. It was occupied by the Windmill Lane Studios in the 1980’s and currently by the Pulse College incorporating the studios.
The submission includes a series of photomontages depicting a 6/7 storey building, comprising extra storeys on top of the existing building in a contemporary style. Examples of other vertical extension to historic buildings are given, including the Arup building further along Ringsend Road.

It is submitted that a 6/7 storey commercial building at this location would enhance the existing 4 storey bland streetscape. The street would benefit from an architectural feature complementing the Arup building and the Charlotte Quay building. The adjacent bus garage site is identified for 6 storey commercial/7 residential in the SDZ scheme, which is the appropriate scale for this city street. There is precedent in the docklands for the juxtaposition of old and modern structures.

Development Agency Response;

The building is a protected structure (RPS Ref 7381) in the City Development Plan, referred to as the former Bovril building. As such any applications will be assessed in accordance with the heritage policies in the City Development Plan (particularly Chapter 11), together with para 5.4.6 of the SDZ Scheme 2014 and the National Building Heights Guidelines 2018.

Para 5.4.6 of the SDZ Scheme 2014 notes that the retention and adaptive re-use of the protected structures in the SDZ is an important objective, and that they are a “fixed element” due to their scarcity in the SDZ. It is an objective to ensure that new buildings, including higher buildings can be juxtaposed with protected structures in a harmonious fashion.

Submission number 84

This submission, on behalf of Cosgrave Property Group, relates to a 3-storey office building at the corner of Bridge Street and South Dock Road, at the south side of City Block 19.

The proposed is for a 7 (potentially 8) storey building, stepping down to 5/6 storeys adjacent to existing 4 storey residential buildings. The submission is accompanied by a series of photomontages.

It is submitted that a strong argument can be made on the grounds that the visual analysis demonstrates that the existing building is of low quality and should be replaced by an 8 storey building with progressive setbacks, which would sit comfortably in the townscape without excessive visual impacts.

Development Agency Response;

Integrity House, Ringsend Road, forms part of a larger relatively modern apartment scheme at the southern end of Block 19. It is not identified as a development site as shown on Figure 2 of the approved scheme – indeed over half of the SDZ land area comprised sites which were already developed. The purpose of the SDZ scheme was to provide a coherent framework for the development of the remaining vacant lands.

The implementation chapter of the SDZ Scheme 2014 (Chapter 6, p223) contains a provision for the planning assessment of height previously developed sites viz:

“In relation to height, any new building or additional height to existing buildings shall relate to the prevailing height as set out in the relevant City Block or adjacent blocks in the development code.”

It is proposed to amend this provision to take account of the National Guidelines on Urban Development and Building Heights viz.

“In relation to height, any proposed new building replacing an existing building, or additional height to existing buildings shall be assessed having regard to the policies and criteria in the National
Guidelines on Urban Development and Building Height 2018 in the context of the approved amended SDZ Planning Scheme.

Submission 85

The SDZ needs to be reviewed in its entirety and not only certain sections because the SDZ is a legally binding contract between the local community, developers and the local authority.

The SDZ cannot be modified as supporting reports like the light studies only took account of buildings of 8 storeys maximum and that an entire analysis is required if heights are to be changed.

Increase in height will have a detrimental effects on amenities of existing properties and developments have not facilitated family living which is submitted is the objective of the SDZ. There has not been any community gain from the SDZ to date and supply of rent only community will no create a sustainable long-term community. It is submission is requesting an oral hearing so as the voice of the community can be heard.

Development Agency Response;

The heights standard in the SDZ planning scheme is being reviewed in accordance with the ‘Urban Development and Building Heights’ guidelines 2018 and a report to amend the scheme will be submitted to An Bord Pleanala for consideration. The review of heights is mandatory on foot of the guidelines.

The height review carried out by the agency takes into account a new light and shadow analysis, which informs the agency on where additional heights can be located in the City Blocks. Proposals for additional heights in the SDZ will be carefully articulated so that there will be no significant impact on the residential community and the environment.

With regards to community gain in the docklands area, the SDZ has provided community infrastructure and services to the area as highlighted in the updated Social infrastructure audit 2018.

Submission 86

Setting the building heights across the SDZ at 6-8 storeys is too low and is a lost opportunity to the city. It is submitted that the review will favour greater heights across the SDZ, further additional specific areas for taller buildings would be identified, particularly in proximity to waterbodies and to existing & planned public transport nodes.

Height/form requirements for block 17 is overly prescriptive and revised to permit higher buildings not just on buildings fronting the Grand Canal Dock but also the southern frontage just outside the SDZ. The submission seeks more height on sites fronting the Grand Canal and adjacent to the Grand Canal Dart station. Submission wants to amend section of City Block 17 in paragraph 5.5.17 of the planning scheme.

Development Agency Response;

The development Dublin Docklands is based on a sound urban design solution that offers variety in urban form and height. In the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area.

Whilst areas in close proximity to the waterbodies include very accessible sites close to public transport, providing additional height without consideration to surrounding areas may be overly restrictive. Any additional height is thought out with regard to the original structuring principles including the significant of hub areas in the context of development to date.
It is not desirable to amend the planning scheme to take into account sites outside the ministerial SDZ order. The subject site would be dealt with by the Dublin City Development Plan having regards to the context, size and scale of adjoining buildings.

**Submission 87**

Welcomes the height review and submits that the docklands area having regards to its location and proximity to public transport nodes should be facilitated for greater heights than that currently stipulated in the SDZ planning scheme. Building heights should be assessed in accordance with the criteria set out in the Urban Development and Building Height Guidelines and not capped to a specific height limit. There is an opportunity to shape the skyline in a more sustainable manner.

**Development Agency Response;**

The development of Dublin Docklands is based on a sound urban design principles that offers variety in urban form and height, yet within a scheme that is now largely built out. The agency aims to maximise benefits associated with proximity to quality public transport and in the interest of proper planning and sustainable development, additional heights in the SDZ will have regards to the existing context, height and scale in the area. This will increase density and intensity of use. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the 'Urban Development and Building Heights' guidelines 2018. The criteria are applied as required in the statutory guidance, and this includes sustainability-related criteria.

**Submission 88**

Hanover Quay Property Development Company submits that their completed building in City Block 15 has the potential to accommodate at least an additional floor of development.

**Development Agency Response;**

In the interest of proper planning and sustainable development, the planning scheme sets out that additional heights in the SDZ will be assessed having regard to the existing context (including built-out areas), height and scale in the area.

Whilst areas in close proximity to the waterbodies include very accessible sites close to public transport, providing additional height without consideration to surrounding areas may be overly restrictive. Any additional height is thought out with regard to the original structuring principles including the significance of hub areas in the context of development to date. The Planning Authority recognises the potential of such areas for urban consolidation. Additional height provides an opportunity for additional residential and commercial space in the area.

**Submission 89**

Ronan Group submits that heights polices and limits set in the planning scheme needs revisiting and amendments to ensure consistency with national policy guidance promoting urban consolidation. It is requested that sites at Spencer Dock, City Block 2 and City Block 7 should have significant increase of heights between 20-25 storeys and a cluster of buildings up to 60 storeys in City Block 9. It submits that the current maximum heights set out for City Block 2B, 2D and City Block 7 is contrary to the national planning policy set out in the national planning framework. The submission points out sections of the Urban Development and Building Heights Guidelines, Dublin City Development Plan and the National Planning Framework that supports their argument for increased heights on their lands.
Development Agency Response;

The development Dublin Docklands is based on a sound urban design principles that offers variety in urban form and height. The agency will ensure that additional heights in the SDZ will have regard to the existing context, height and scale in the area. The Planning Authority recognises the need for a review in recognition of national policy objectives and requirements set out in the ‘Urban Development and Building Heights’ guidelines 2018. It is acknowledged that the extent of building heights permissible has an impact on urban consolidation, and that the Planning Scheme SDZ is well located for public transport and services. Additional height provides an opportunity for additional residential and commercial space in the context of a planning scheme which is largely built out. Having regard to the location and context of these blocks the Development Agency considers that elements of City Blocks 7 and 9 have potential to deliver some additional height, and the scale and design of this additional capacity takes cognisance of good practice in urban design as determined by criteria set out in the statutory Guidelines.

Submission 90

The submission by Tom Phillips & Associates Planning Consultants, Henry J Lyons Architects and supported by inputs from a team of consultants relates primarily to City Block 9, but complement the submission on City Block 2 and 9.

It is submitted that CB9 (1.86 Ha) enjoys 2 permissions for a residential and commercial scheme, comprising c 35,800 m² gfa of commercial floorspace and 420 residential units, in the 8 storey / 10 storey plus one setback storey format under the current planning scheme.

In light of the NPF and the 2018 Guidelines, a major new scheme is proposed in what would be Dublin’s first vertical forest comprising a cluster of tall buildings up to 45 storeys, providing c 69,350 m² commercial floorspace and some 1000 units.

It is submitted that taller buildings are being approved through the SHD process than in the SDZ, eg Jacobs Island and the Prism Cork, 67m amd 70m respectively.

Knight Frank consider that the higher than expected economic growth since 2014, as well as further North Docklands specific demand as a result of Brexit, means that there is significant need for further office and residential development in the SDZ. It is noted by Knight Frank only 1679 residential units are completed / under construction. Has planning submitted, out of the 2600 provided for in the Planning Scheme.

The submission notes the NPF estimates that Dublin City and suburbs will grow by c264,000 by 2040, with an emphasis on brownfield sites. NPO 13 identifies building height as an important means of providing quality sustainable urban areas, based on performance criteria. The North Lotts and Grand Canal dock SDZ is the ideal central location to apply the Apartment Guidelines (March 2018). The Height Guidelines (December 2018) are referenced in some detail, including SPPR 1, on the removal of blanket height caps, which can hinder innovation in urban design and result in further outward growth. This approach would allow the remaining sites in the SDZ to achieve their true development potential.

Also, the NPF promotes higher densities in appropriate places so critical mass is achieved, to maximise the return on infrastructure investment, and to stimulate housing output. The NPF vision will be hindered without an upward review of the building heights. It is submitted that the current SDZ Scheme is modest compared to the Amended Planning Scheme 2006, which facilitated the Watchtower (c100m) and the U2 tower (c 130m).

The submission contains an analysis showing that the existing built-up area of the SDZ has an average height of 7 Storeys (22M), a median height of 24m, with the highest building being Capital Dock (22 storey), all of which indicates the SDZ is predominantly mid – rise. The removal of height caps would achieve a more sustainable city that can thrive in an open, international economy.
Section 4 of the submission shows existing and proposed tall buildings in other cities, noting that there are 76 tall buildings planning this year for London. A figure from Tower Hamlets draft report 2017 showing cluster principles is included, together with images of Amsterdam, Liverpool, Rotterdam, Oslo, Isle of Dogs, with buildings up to 149m in one case.

The proposed masterplan and design concept for CB9, plus a massing study and a visual impact study from various locations in the locality is also included in the submission. Commercial blocks are located to the west and south –west of the site with residential blocks and 2 towers to the east and north east of the section. The commercial buildings step up from c14 storeys to c 20 storeys adjacent the residential towers, which are c 45 storeys and c 40 storeys high respectively. The podium blocks to those building range from 16-20 storeys and feature roof gardens in addition to a ground based pocket park with east-west and north-south pedestrian connectivity through the site. It is indicated that the proposal will include smart energy saving features.

The submission is accompanied by a daylight and sunlight analysis, which concludes that the proposals can be classified under the BRE as having negligible adverse impact, and that over half of the amenity space would receive at least 2 hours of sunlight.

**Development Agency Response;**

The Development Agency has given full consideration to this submission in the light of the new Guidelines on Height and having regard to the successful implementation of the SDZ Planning Scheme 2014 to date and the Independent report by Loci.

It is considered that this 1.86 Ha site due to its particular location on the Liffey Quays opposite Capital Dock (at the confluence of the Liffey and Dodder) and adjacent Point Square can accommodate higher buildings within the established urban structure, which provides for a 35 x 20m public pocket park, together with E-W and N-S permeability. The SDZ Planning Scheme already provides for a number of landmark buildings, associated with each of the 5 hubs. It is proposed to include a further landmark building at the SE corner of the CB9 at the corner of North Wall Quay and the new North Wall Avenue (9D). This building, within the 22-25 storey residential range, would be a city wide landmark tower acting as a new city gateway in tandem with the 22 storey Capital Dock Tower directly opposite. It is noted that the northern tower proposal in the submission has a floor area of c 25m x 30m and this should be retained not only to provide a desirable slenderness ratio when viewed from distance, but also to protect the amenity of the mixed use buildings and civic spaces to the rest of CB9 and the adjacent city blocks.

There is also an opportunity for a local landmark at the north-east corner of CB9 B, to frame Point Square, in symmetry with the building on the opposite side on Mayor Street.

With regard to the remainder of CB9 it is noted that the height ranges are from 6 storeys residential to 10 storey residential on the quays, with an allowance for an extra setback floor. This height range not only maintains the quality and amenity of the mixed use in internal streets and residences, but maintains the proposed scale relationship between streetscape buildings and the landmark buildings.

Having regard to the above analysis, it is considered that the height ranges up to 45 storeys proposed in the submission would have serious adverse impacts on the remainder of the City Block and the adjacent areas. It is noted that the proposals in the submission would increase the quantum of residential / commercial floorspace by approximately two fold with a commensurate increase in plot ratio from 3.5 to 7, with no increase in public realm. As indicated on the Loci report at para 2.10, the same density can be achieved by either a perimeter block or a landmark building with increased open space/ setting around it.

In relation to the removal of any height cap as proposed in the submission, this is not accepted for a number of reasons. Firstly, the SDZ Planning Scheme has a carefully modulated urban structure, of which height is one component, which has resulted from a detailed public consultation process. The height varies across the SDZ, from protected structures, to town houses adjacent existing 2 storey to
6/7/10 storey residential depending on streetscape characteristics (and with a further allowance for setback storeys) together with landmark buildings. Site visits indicate that the result is a variety of styles and heights which will mature into a vibrant city neighbourhood.

Secondly, Section 168 of the Planning and Development Act requires that heights be specified in an SDZ Planning Scheme, presumably because there are no rights of appeal. To allow for “ad hoc” applications up to any height would completely undermine the integrity of the SDZ Process in that the many people and stakeholders involved in the consultation process did so in the expectation that the approved scheme is the one which would be implemented.

The examples from various European Cities are noted. However, each city has a particular relationship with its docklands and has evolved approaches to height appropriate to their history, culture and urban structure. The Dublin Docklands plans since 1997 have evolved to provide for a mixed use approach centred on city blocks, irrigated by a hierarchy of streets, in the Dublin tradition to create vitality and variety, as set out in para 3.7 of the LOCI Report.

The analysis by Knight Frank does not tell the full story. As shown in the Table on page 8, permission has been granted for 316092m$^2$ of commercial development to date, and there is no reason to doubt this will be implemented, given the recent pace of development. As indicated in Section 1 the indicative commercial capacity of 305 – 366,000m$^2$ as set out in the Scheme has been exceeded by 37000m$^2$ to date, achieved by the flexible building line within the city blocks. The relative lag in residential output has been due to the cyclical nature of the economy; and in this regard the 2014 Scheme had the vision to retain 50% of the site area for residential purposes to take account of economic cycles.

The shadow analysis lacks a clear methodology and the effects of the proposed development on the adjacent open spaces, including the Point Square, or on adjoining streets and buildings to the east & West.

Secondly the analysis submitted shows that the proposed development does have a negative effect on the city block to the north of the site during the equinoxes, with an increase in shadow effect on the building to the north by 12pm and 3pm.

The Development Agency fully supports the concept of energy smart buildings, with green roofs etc and this is applicable to all new buildings in the future (see for example Section 4.14 of the Planning Scheme; ‘Building Quality and sustainable Design’).
Overview of Independent Review and the submissions received
3.1 The Development Agency (DA) commissioned Loci, an independent firm of urban design consultants, to provide a report and recommendations on the opportunities for extra height in the North Lotts and Grand Canal Dock SDZ Planning Scheme, in light of the new National Guidelines on Urban Development and Building Heights DHPLG, December 2018.

The Loci Report, which is included as an Appendix, has been carefully considered together with the submissions received, and inform the proposed amendments set out in Section 4 below.

3.2 The Development Agency has also given careful consideration to all the submissions received (Chapter 2). The submissions fall into two broad categories; those promoting additional height to a variety of scales, whilst others state that the scheme is a social contract conveying certainty for residents, which is particularly important given the limited right of appeal.

3.3 Sections 2.1 to 2.10 of the Loci Report summarizes the national and local policy for height as set out in the National Planning Framework 2018, the various Government Circulars on height, density and quality urban design published since 2007, including the Guidelines on Design Standards for new Apartments (2018), Design Manual for Urban Roads and Streets (2013), and the Circular on Urban Development and Building Heights (Dec 2018.)

3.4 Para 2.10 of the Loci report analyses the evolution of urban structure and height in the various Docklands Schemes since Dublin Docklands Development Agency (DDDA) was established in 1997. In general terms, the planning Schemes provided for medium to high density development (typically within a plot ratio of between 2.0:1 and 3.0:1) within a permeable perimeter block structure based on the underlying orthogonal, historic block pattern of the docklands. Building heights reflected accessibility, location and route structure. Building height for main routes were generally in the range of 5 – 6 commercial storeys and 6 – 8 residential storeys (with potential for set–back floors), with height dropping down to 3 – 4 storeys in some smaller streets and internal spaces (in the case of Grand Canal Dock. Locations were also designated for lower and higher landmark buildings up to 22 storeys at Sir John Rogerson’s Quay / Britain Quay and Grand Canal Dock Station in the Grand Canal Dock and Point Square and Station Square).

In relation to the build out of the North Lotts & Grand Canal Dock SDZ to date, Loci consider that the approach taken to date with regard to the blend of building height and urban density has been very successful (2.3)

3.5 Section 3 of the Loci Report reviews best practice in urban design. Research indicates that increased height does not necessarily result in increased density, and in areas of relatively low sun obstruction, such as Dublin, increased building height can lead to reduced plot ratio. Nor, according to English Partnerships, does a building need to be tall to be a landmark. The Report includes a diagram showing how the same density can be achieved by varying building height, block size and building depth.

Loci includes a very useful section on best practice in comparable European cities, referencing Amsterdam, Helsinki, Copenhagen and Hafencity. Some key points emerge from these examples, including the fact that a coherent urban scale prevails, with perimeter blocks in the realm of 6 storeys helping to form streets, with taller buildings signifying important placemaking locations. In comparison with the case studies, the Dublin planning scheme has delivered a high density development.

3.6 Tall buildings have a positive role to play in signifying locations of civic, commercial or visual importance, or focal point of urban activity. Local landmarks such as corner buildings can provide identity and points of orientation / wayfinding. Loci note that streets and spaces should be scaled so that they are defined by appropriately scaled buildings. It should be noted in this respect that most of the streets in the SDZ, such as Castleforbes, New Wapping and Mayor Street are established Dublin Streets. In addition the microclimatic effects of taller buildings must be considered.
3.7 As pointed out in Submission 90, there were also Amendment Planning Schemes published in 2006 mainly to facilitate extra tall buildings (the Watchtower and the U2 building), at the height of the boom. However these buildings were never constructed.

3.8 The Loci Report includes the Development Code Map (Fig 35) form the 2014 Planning Scheme together with an overview of the urban design rationale and delivery to date, such that 14 of the 20 city blocks are either completed or commenced. The rate of progress, particularly in the North Lots, has surpassed expectations.

3.9 In Section 4, Loci set out a suite of urban design performance criteria which are specifically tailored for the SDZ, having regard to the recent Government Guidelines to avoid generic or blanket area height controls. These 9 criteria are related to urban design objectives derived from best practice, planning guidelines and statutory plans.

The Development Agency considers that these performance criteria are sufficiently robust and relevant to provide a toolkit for a review of height in the SDZ.

3.10 Section 5 of the Report then provides an overall review of urban scale and building height in the Planning Scheme area and the potential for change. It is noted that development in the area has proceeded in line with the PS, with the commercial floorspace target now exceeded and the residential units at almost 85% of target. Loci provide a commentary on the performance criteria in this section, which overall the Development Agency consider to be robust. In relation to the objective to provide high levels of local and wider-area legibility the report concludes there is potential for a city –wide landmark building on the north side of the Liffey opposite the Capital one Tower, Britain Quay. There is also potential to provide a number of local landmarks in selected locations such as junctions and block corners to improve local legibility. It is important that these local landmarks have a distinct definition (usually vertical emphasis) which distinguishes them from the streetscape “shoulder” height buildings. The local landmarks are identified by ’X’ in the Revised Fig 35.

The Loci report includes a diagram (Fig 21) showing the gateway visual concept on the Liffey corridor, plus a three dimensional view showing how two gateway buildings of similar scale complement each other.

3.11 In relation to the Urban Design Objective to provide appropriate continuity and enclosure to streets and spaces, Loci concludes that the PS is robust in this respect, noting that the street proportions in Fig 31 should continue to be applied. It is recommended by the consultants that additional floors should not further imbalance the proportions of the street and as such will require setbacks of at least 45 degrees rather than the current PS provision for a 1.5m setback for additional floors.

The Development Agency notes that the PS at p174 states that a setback of “1.5 metre plus” may be considered. The extent of the setback to upper floors depends on a number of factors, including orientation and width of the street and the daylight analysis. It is not the intention that the setback storeys be hidden from view; rather that the shoulder height of the street is maintained and potential overbearing impacts managed. Accordingly, it is proposed to retain the existing text in PS (P 174); 1.5m plus allows for greater setback if necessary.

3.12 It is noted that, in addition to the proposed additional landmark buildings, Loci has reviewed the height code for all streets and unbuilt city blocks as set out in Fig 35 in the context of the new Guidelines. Additional floors are now provided for in a number of city blocks, including the north and west sides of CB2, CB3F, CB7 (with setbacks from the houses on Mayor Street and New Wapping Street) CB9, CB18 and CB19. It must be re-iterated that these proposed amendments to the height code will result in a typical increase from 6 storey commercial / 7 storey residential to 8 storey commercial / 10 storey residential ie an extra 3 residential floors, (subject to the usual development management considerations).
3.13 In addition to this, it is noted that page 174 of the current SDZ Scheme provides for an additional storey (except Blocks 1 to 5) with a setback of 1.5m plus, subject to a compelling urban design rationale. Loci does not recommend any change to this provision for an additional storey and make the comment that “monolithic” or slab blocks should be avoided, reflecting similar advice at p14 of the DHPLG Height Guidelines. In this respect the Planning Scheme must not result in unpleasant city streets defined by 10-12 storey slab blocks such as at Hawkins House, Poolbeg Street.

The Development Agency has considered whether the Planning Scheme provision to allow for one setback storey on street blocks (p174 of the scheme) could be increased to 2 storeys. However, it is concluded that, given the proposed height band increase from 6 to 8 storeys (commercial) and 7 to 10 storeys (residential), a potential extra 2 setback storeys would have unduly overbearing impact on streets in the SDZ and would nullify the modulation between streetscape buildings and landmark buildings. The setback criteria shall not apply to landmark buildings, as it is important that they have a vertical expression.

3.14 Section 6 of the Loci report sets out recommendations for the City Blocks yet to be largely developed i.e. 2, 3, 7, 9, 11, 18 and 19, showing clearly the proposed amendments to height, compared to the current Planning Scheme. The recommendations together with the Development Agency response is summarised in the following paras:

3.15 City Block 2: The Loci report recommended height additions from 6 commercial / 7 residential to 8 commercial / 10 residential are accepted by the Development Agency (DA), given the setback from, and elevated nature of Sheriff Street, together with the existing scale of buildings fronting the opposite side of Park Lane. In order to achieve the desired vertical modulation, it is considered by the Development Agency that the identified local landmarks at Block 2B should be increased to 12 storey residential at the corners, and must be no more than one third of the sub-block frontage. The localised height addition at the north side of 2B is also accepted for these reason given. It is also proposed that the requirement on p 183 of the planning scheme in relation to temporary pavilions be removed, as the Agency wishes to promote permanent buildings on this block which do not compromise the future DART Underground.

3.16 City Block 3: The Loci report recommended increases in height are considered acceptable by the Development Agency. However, the local landmark buildings at 3A and 3B should be increased to 12 storey residential at the corners, and must be no more than one third of the sub-block frontage. The recommended increases at CB 3F to allow for setback 8 storey commercial / 10 residential is also accepted. However, the proposed local landmark at the north-west corner of 3F should read a vertical modulation up to 10 storey commercial / 12 residential, clearly distinguished from the Main Street shoulder height to avoid the creation of “slab” blocks. The units at Block 3B should be in 3 storey townhouse format, to provide a variety of typologies.

3.17 City Block 7:- This City Block, with its variety of protected structures, river frontage and adjacent Station Square provides an excellent opportunity for sensitive place-making. The recommended increase in height by Loci from 6 commercial / 7 residential to 8 commercial / 10 Residential at 7C(Fronting park Lane) and at 7B and 7D, with setbacks to protect the residential amenities along Mayor Street are considered acceptable by the Development Agency. An opportunity for a local landmark is identified at the corner of the Quays and New Wapping Street, where the DA has plans for a new pedestrian / cycle bridge over the Liffey. Careful consideration must be given to this corner local landmark, so that it retains the essential scale relationship with the protected structures and the Convention Centre, itself designed as a landmark building. In order to achieve the desired vertical modulation, Loci recommends that the building should not exceed 20m x 30m in area, with the recommended height increased to 10 commercial at the SE corner. The Development agency agree with the analysis as an urban design principle. However having regards to the fact that the development, including the lift core has commenced it is proposed that the floor area must not exceed 40x25m with an increase in height to 12 commercial
residential in order to achieve the desired vertical emphasis while offset from the protected structures. It is proposed to delete the requirement in relation to temporary pavilions for reasons set out above.

3.18 **City Block 9**: As discussed in Section 2 (submission 90) it is considered that the 1.86 Ha site, due to its particular location on the Liffey Quays opposite the confluence of the Dodder and close to Point Square has a potential to provide for both a city landmark building and a local landmark, notwithstanding the fact that the site is on the north side of the waterbody, with the result that overshadowing will need to be carefully considered, particularly given that the 35m x 20m pocket park is relatively small. The Planning Agency concurs with Loci recommendation to provide a 22 – 25 storey residential tower at the South - East corner of CB 9D. This building would be a city wide landmark acting as a Liffey gateway counterpart to the Capital Dock Tower on the south side of the Liffey. It is noted that the northern tower in Submission 90 has a floor area of c 25m x 30m and this should be retained, to provide both the desired slenderness ratio, but also to protect the amenity of the mixed use buildings, streets and spaces to the rest of CB 9 and the adjacent city buildings.

There is also opportunity for a local landmark at the north east corner of CB 9B to frame Point Square. The Development Agency proposes that this landmark has a height of 12 storey residential in order to provide appropriate height modulation, and be no more than one third of the north block frontage or one quarter of the North Wall Ave frontage.

Bearing in mind the need to maximise daylight to the Block 9 and that the PS provides for 9 storey commercial / 10 residential on the Quay frontage ( with the potential for an extra 2 storeys under this proposal) it is considered that height modulation over the rest of the block is appropriate.

3.19 **City Block 11**: The recommendations by Loci consultants in relation to CB11 are accepted in the main. Much of the adjacent development fronting Lime Street and within the city block itself is of a lower scale and established. Within this context, the current Planning Scheme allows for 5 storey commercial / 6 storey residential on all frontages, apart from Cardiff Lane where 6 storey commercial / 7 storey residential is permissible. The Development Agency concurs with the Loci recommendation that this arrangement should remain. In relation to the NW corner of CB 11A fronting City Quay, it is considered that there is an opportunity for a vertical modulation up to 12 storey residential / 10 commercial, provided it takes up no more than one third of the two frontages and is of a quality design that respects the relationship with the protected structures. A local Landmark at this location provides greater articulation of building height along this part of the Quays.

3.20 **City Block 18**: The block layout for the bus depot site provides for a new link from Ringsend Road to a small 25 x 20 m civic space overlooking the Grand Canal Dock. Heights range from 5 commercial / 6 residential to 6 commercial / 7 residential. Loci's recommendation for 2 local landmark features at the intersection of the proposed civic space and the dock waterbody is accepted by the Development Agency, provided that they extend no more than 30% of the dock frontage, and that the buildings are used for residential purposes.

3.21 **City Block 19**: This triangular City Block at the eastern end of Grand Canal Dock is identified for a mix of 40 res/ 30 commercial / 30 community, recreational or cultural in the scheme. Loci recommends the introduction of a local landmark to CB19B to provide a stronger building definition at the eastern end of the Dock waterbody. The recommendation of a 8 storey commercial / 10 storey residential is accepted by the Development Agency for the reason stated. In addition, the development Agency proposes a smaller height building to the north of Block A, to act as a local landmark at the junction of the Grand Canal Dock and the River Dodder.
3.22 In relation to the remaining city blocks there are a number which are either completed or substantially complete. The current Planning Scheme (p223) contains a provision that any proposals for additional height to existing buildings shall relate to the prevailing height as set out in the relevant city block, or adjacent blocks in the development code.

The Development Agency proposes that this provision be amended to take into account of the Guidelines on Urban Development on Urban Height and Building Heights viz: “In relation to height, any proposed new building replacing an existing building or additional height to existing buildings shall be assessed having regard to the policies and criteria in the National Planning Guidelines on Urban Development and Building Height 2018 in the context of the approved amended SDZ Planning Scheme.”

3.23 The current planning scheme has an estimated capacity of 305 – 366,000m² commercial space and 2600 residential units. The proposed amendments has the potential to provide for an additional quantum of approx. 45,000 sq m in total, comprising 22,500 sq m commercial space and 225 residential units, whilst maintaining the essential urban structure to ensure quality placemaking in this SDZ. Of course, this estimated additional capacity may increase during the implementation process, due to the flexible elements built into the Scheme, and other factors such as the Guidelines which allow for smaller apartments.

If implemented, the increase in commercial area represents a 6.1% increase on the original 366,000 sq.m figure, and the increase in the number of residential units represents an increase of 8.6% (in unit terms).

3.24 Procedure for making amendments to a Planning Scheme

Section 170A of the Planning and Development Act 2000 (as amended) sets out procedure for making an amendment to a Planning Scheme.

Subsection (1) requires the Planning Authority to make an application to the Board to request an amendment to the planning scheme.

Subsection (2) states that where an application is made, the Board shall make a decision as to whether the making of the amendment would constitute the making of a material change to the planning scheme.

To assist the Board, the proposed amendments to the Planning Scheme are considered below with reference to the criteria outlined in section 170A(3)(b), where the criterion in italics is commented on in each case (i) to (v) as follows:

(i) …would not constitute a change in the overall objectives of the planning scheme concerned,

It is considered that the proposed amendment would not constitute a change in overall objectives of the Planning Scheme. Whilst it would result in some additional building heights in the area, these additional storeys are guided by the previously adopted urban design rationale for the scheme and there will no alteration in the main objectives of the scheme.

(ii) …would not relate to already developed land in the planning scheme,

The proposed height amendments relate to undeveloped lands. Whilst these lands may have associated approved developments, and may have been altered somewhat through site clearance and excavation in some cases, they remain undeveloped for purposes of these amendments.

(iii) …would not significantly increase or decrease the overall floor area or density of proposed development,

The proposed amendments would have no significant impact on overall floor area or density of proposed development in the SDZ. If implemented, the increase in commercial area
represents a 6.1% increase on the original 366,000 sq. m target figure, and the increase in the number of residential units represents an increase of 8.6% (in unit terms).

(iv) ...would not adversely affect or diminish the amenity of the area that is the subject of the proposed amendment.

The amendments proposed would not adversely affect or diminish the amenity of the area as additional heights provide visual variety to the originally planned skyline in the 2014 Planning Scheme. Proposals for taller elements of City Blocks have been assessed in principle for shadow impacts. Any proposals on foot of the revised heights must to comply with quality and environmental standards in the adopted planning scheme.

3.25 The Loci report contains a revised shadow analysis at city block level, which replaces the diagrams at Appendix 6 in the current Planning Scheme. It is also proposed to replace Fig 34 – Indicative 3D Model.

Conclusion:

3.25 Dublin City Council, as the Development Agency for the North Lotts and Grand Canal Dock SDZ Planning Scheme 2014, has carried out this review of the Planning Scheme as required under SPPR3 of the Urban Development and Building Height Guidelines (Dec 2018). The Development Agency has concluded that having regard to:

• The National Planning Framework, the RSES, and the Urban Development and Height Guidelines.
• The approved Planning Scheme and the urban structure which has been successfully implemented to date, in order to achieve a successful mix of uses as an integral part of good placemaking as per SPPR 2.
• The need to achieve the right balance between successful, vibrant streets and elegant tall buildings located in accordance with good urban design principles, including the avoidance of slab blocks.
• The need to seek opportunities for increased height and density in accordance with SPPR1, notwithstanding the comparatively high densities achieved in the SDZ to date.
• The current housing crisis and the need to build out all the areas allocated for residential in the Planning Scheme;

it is proposed to amend the Planning Scheme by the addition of a number of landmark / local landmark buildings, together with additional shoulder height storeys on a number of streets, plus opportunities for a setback storey subject to detailed analysis at application stage.

The Development Agency considers these proposed amendments do not have significant material impacts on the environment, and request An Bord Pleanála to expedite its decision on the proposed amendments as provided for in the fast-track mechanism set out in Section 170A of the Planning Act.
Proposed Amendments to North Lotts and Grand Canal Dock SDZ Planning Scheme
Proposed Amendments to North Lotts and Grand Canal Dock SDZ Planning Scheme

4.1. Summary of Proposed Amendments

It is proposed to revise the building height code in the planning scheme. The amendments will ensure the adopted North Lotts and Grand Canal Dock Planning Scheme complies with statutory building height guidelines published in December 2018 by the Department of Housing, Planning and Local Government. Accompanying statements are enclosed in relation to Appropriate Assessment and Strategic Environmental Assessment considerations.

The North Lotts and Grand Canal Dock Planning Scheme 2014 contains development codes for height standards within Figure 35 (see p 178). The amendment now seeks to revise/amend the following heights standards having regards to the criteria set out in the aforementioned guidelines:

(a) Text providing for additional storeys supporting Figure 35 and compliance with heights guidelines
(b) Urban form/heights in City Blocks 2, 3, 7, 9, 11, 18 and 19, as described and illustrated in the scheme.
(c) Figure 35 Graphic titled ‘Development Code for City Blocks’

4.2 The Proposed Amendments in Detail

The proposed amendments to the North Lotts and Grand Canal Dock Planning Scheme 2014 are set out hereunder. These comprise changes to City Blocks /graphics/figures and also text changes.

Please note in relation to text changes, relevant pages numbers of the planning scheme are referenced where applicable, and the notation used hereunder is as follows;

- Deletions as shown as red and strikethrough bold text,
- Amendments / additions are shown as green and bold text

4.2.1 Section 5.4.5 Height as part of the Urban Structure

Page 174. Last sentence to be amended, i.e. “In addition to the setbacks which may be necessary for design and amenity reasons within the height envelope in Fig. 35, an additional storey, with a setback of 1.5m plus may be considered subject to a shadow analysis and a compelling urban design rationale. This option for additional storey shall not apply to Blocks 1 to 5” This provision does not apply to any landmark or local landmark buildings

4.2.2 Section 6.1.2 providing co-ordinated delivery, requirements for each City Block

Page 223. Last paragraph to be amended, i.e.

In relation to height, any new building or additional height to existing buildings shall relate to the prevailing height as set out in the relevant city block or adjacent blocks in the Development Code. The approved amended SDZ Planning Scheme has had full regard to the Planning Guidelines on Urban Development and Building Height 2018. As such, any proposed new building replacing an existing building or additional height to existing buildings shall be
assessed in the context of the overall height in the approved amended SDZ Planning Scheme, which reflect the criteria set out in the Building Height Guidelines. Proposals involving a material change of use shall accord with the land use mix ratio as set out in the Development Code (See Chapter 5 for Development Code for Individual City Blocks).

4.2.3 Appendix 3, Providing Co-ordinated Delivery

Page 264. Penultimate paragraph to be amended, i.e.

In relation to height, any new building or additional height to existing buildings shall relate to the prevailing height as set out in the relevant city block or adjacent blocks in the Development Code.

The approved amended SDZ Planning Scheme has had full regard to the Planning Guidelines on Urban Development and Building Height 2018. As such, any proposed new building replacing an existing building or additional height to existing buildings shall be assessed in the context of the overall height in the approved amended SDZ Planning Scheme, which reflect the criteria set out in the Building Height Guidelines.

4.2.4 City Block 2

Page 183 Section 5.5.2, 2, ‘Urban Form/Height Range’ to be amended .i.e.

- Block 2A to be 8 Storey commercial/10 storey residential fronting onto Sheriff Street Upper.
- 12 Storey residential local landmarks at NE and NW corners of block 2B, to extend along no more than one third of the sub-block frontages.
- Block 2C to be 12 storey (maximum) commercial (minimum 10 storey) fronting Station Square, to achieve balance between hub quantum and view lines from Georgian mile. Landscaped plaza south of block. Western side of 2C to be 8 storey commercial/10 storey residential.
- Remaining blocks to range between 5 storey commercial/6 storey residential and 6 storey commercial/7 storey residential, stepping down to 3 residential immediately north and west of the Mayor Street terrace.
- Urban blocks to front Sheriff Street to remake and contain the street.
- The 7 storey residential frontage to New Wapping Street responds to the 2/3 storey terrace opposite, more favourably than the 9 storey scheme previously certified.

Any temporary pavilion buildings to be up to a maximum of 4 storeys
4.2.5 City Block 3

Page 184 Section 5.5.3, Urban Form/Height Range to be amended i.e.

- Up to 7 residential/6 commercial provides strong perimeter to city block.
- 10 storey commercial/12 storey residential local landmarks at corners 3A and 3B and must extend for no more than one third of the length of the sub-block frontages.
- 3-4 storey residential on block 3D to provide transition with existing 2 storey terraces, stepping down to 3 storey residential immediately east of the terrace on Mayor Street Upper and to the rear of the northern end of the terrace on New Wapping Street.
- 8 storey commercial/10 storey residential setback at 3F. The North-west corner of 3F to provide a vertical modulation of up to 10 storey commercial/12 storey residential and must extend no more than one third of the length of the sub-block frontages.
4.2.6 City Block 7

Page 190 Section 5.5.7, Urban Form/Height to be amended i.e.

- 6 Storey commercial/7 storey residential in blocks 7C and D to provide balanced context for the Protected Structures and central Station Square.

- 7 Storey commercial to block 7B fronting Station Square, reducing to 6 storeys commercial (7 residential) to east, having regard to balance between economic hub and residential amenity for terrace north of Mayor Street. To include 8 storey commercial/10 storey residential setback from Mayor Street Upper frontage. The additional storeys to sit below a 35 to 45 degree inclined plane from the main parapets fronting all streets and spaces.

- 8 storey commercial/10 storey residential element set within the central section of the western side of 7C – (comprising up to 40% of the total frontage)

- 6 storey commercial/7 storey residential in Block 7D raising to 8 storey commercial to North Wall Quay with appropriate transition to the Protected Structure, the former London and North Western Hotel.

- 8 storey commercial/10 storey residential on Block 7D, reducing to 6 storey commercial/7 residential on northern frontages, part eastern frontage on New Wapping Street and north of the protected structure (former London and North Western Hotel)
• 12 Storey commercial/ 15 storey residential local landmark at corner of New Wapping Street and North Wall Quay, not to exceed 40m x 25m in area (25m along North Wall Quay and 40m along New Wapping Street).

• Any temporary pavilion buildings to be up to a maximum of 4 storeys.

4.2.7 City Block 9

Page 194 Section 5.5.9, Urban Form/Height to be amended .i.e.

• Building heights to range from 5 storey commercial (6 storey residential) to 8 storey commercial (10 storey residential) to allow for residential amenity and appropriate transition in scale, as well as sufficient enclosure onto main streets, and appropriate scale fronting Quays.

• 12 Storey residential local landmark at the north east corner of 9B to extend not more than 30% of the frontage to Mayor Street upper and 25% of frontage along North Wall Avenue.

• A 22-25 storey Liffey Gateway residential tower at the south-east corner of block 9D not exceeding 25m x 30m per floor.
4.2.8 City Block 11

Page 198 Section 5.5.11, Urban Form/Height to be amended. i.e.

- Existing Protected Structures to be retained. New buildings fronting the northern side of the realigned (East-West) Misery Hill to be 5 storey commercial / 6 storey residential; similar scale on Lime Street. 11C to be 5 storey. New buildings along Sir John Rogerson's Quay (11A) may be up to 8 storeys commercial / 10 storeys residential subject to design criteria to safeguard the character of the adjoining protected structure.

- 10 storey commercial / 12 Storey residential local landmark at north west corner of 11A, to extend no more than one third of the length of the sub-block frontages

- Opportunity to remake North-East corner of Pearse Square with 2/3 storey town houses, rising to 4 storey residential on Cardiff Lane. Cardiff Lane, north of realigned Misery Hill to be 6 storey commercial. (Note: This is outside the SDZ Area)

- The proposed east-west street provides an opportunity for frontage development compatible in scale to Martin Terrace (which is proposed for retention), and provides an opportunity to mitigate the effects of traffic in the area on local residents and improve the pedestrian and cycling permeability of the area. In this regard, environmental improvement measures in the immediate vicinity of Martin's Terrace, which shall be implemented after consultation with the local community, will be undertaken as part of any road realignment.
4.2.9 City Block 18

Page 211 Section 5.5.18, Urban Form/Height to be amended i.e.

- 6 storey commercial / 7 storey residential along the water frontage to frame Grand Canal Dock and also along Ringsend Road to define the streetscape.

- 10 Storey residential local landmarks at corners of 18A and 18B, must extend for no more than one third of the length of the sub-block frontages.

<table>
<thead>
<tr>
<th>Existing (Planning Scheme)</th>
<th>Proposed amendments to height</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image1" alt="Existing Planning scheme" /></td>
<td><img src="image2" alt="Proposed amendments to height" /></td>
</tr>
</tbody>
</table>
4.2.10 City Block 19

Page 213 Section 5.5.19, Urban Form/Height to be amended i.e.

- Commercial / community buildings up to 5 storeys to contain the dock space. Residential perimeter block up to a maximum of 7 storeys to northern side of existing Camden Lock Development, subject to an appropriate transition in scale and design criteria which protects the residential amenity and minimises overshadowing of the Camden Lock Development.

- 8 Storey commercial/10 storey residential local landmark to north of Block A
- 8 storey commercial/10 Storey residential local landmark at the western end of 19B, must extend no more than one third of the length of the sub-block frontage.
### 4.2.11 Graphics amendments proposed

<table>
<thead>
<tr>
<th>Figure number</th>
<th>Page no. of document</th>
<th>Amendment to be made</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fig 34</td>
<td>176</td>
<td>Insert new indicative 3D model</td>
</tr>
<tr>
<td>Fig 35</td>
<td>178</td>
<td>Insert new local Landmark buildings and amend colours for city blocks with additional heights</td>
</tr>
<tr>
<td>City Block 2</td>
<td>182</td>
<td>insert new height development codes</td>
</tr>
<tr>
<td>City Block 3</td>
<td>184</td>
<td>insert new height development codes</td>
</tr>
<tr>
<td>City Block 7</td>
<td>190</td>
<td>insert new height development codes</td>
</tr>
<tr>
<td>City Block 9</td>
<td>194</td>
<td>insert new height development codes</td>
</tr>
<tr>
<td>City Block 11</td>
<td>198</td>
<td>insert new height development codes</td>
</tr>
<tr>
<td>City Block 18</td>
<td>211</td>
<td>insert new height development codes</td>
</tr>
<tr>
<td>City Block 19</td>
<td>213</td>
<td>insert new height development codes (includes minor amendments to block footprints)</td>
</tr>
</tbody>
</table>
Chapter 5

Environmental Assessment Conclusion Statements
A Strategic Environmental Assessment (SEA) conclusion has been made by Dublin City Council regarding proposed amendments to the North Lotts and Grand Canal Dock Planning Scheme.

Taking into account the measures that have already been integrated into the Planning Scheme which contribute towards environmental protection, environmental management and sustainable development, it is identified that all potential adverse effects arising from proposed changes are either present already and will be further contributed towards or will be mitigated so as not to be significant (residual adverse); or are potentially adverse and would be mitigated by the measures integrated into the planning scheme or the Dublin City Development Plan 2016-2022 so as not to be significant. The proposed changes do not change the selected scenario for the planning scheme that emerged from the planning scheme/SEA preparation process. Therefore, it is determined that SEA is not required for the proposed amendments.

An SEA screening report on the proposed amendments has been prepared which accompanies and has informed this statement. The screening report has also been informed by the SEA Environmental Report and the North Lotts and Grand Canal Dock Planning Scheme.
Appropriate Assessment under:
The Planning and Development Act 2000 (as amended);
For the
Proposed Amendments to the North Lotts and Grand Canal Dock Planning Scheme

An Appropriate Assessment (AA) conclusion has been made by Dublin City Council regarding the proposed amendments to the North Lotts and Grand Canal Dock Planning Scheme.

In carrying out this Appropriate Assessment, the Council is taking into account the relevant matters specified under Part XAB of the Planning and Development Act 2000 (as amended), including:

• Existing North Lotts and Grand Canal Dock Planning Scheme (and associated NIR and SEA reports);
• The Strategic Environmental Screening Report on Proposed Amendments; and
• The Screening Statement for the Proposed Amendments of the North Lotts and Grand Canal Dock Planning Scheme.

It is determined that the risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of all European Sites have been addressed by the inclusion of achievable mitigation measures within the existing North Lotts and Grand Canal Dock SDZ Planning Scheme with which the proposed amendments must comply. These prioritise the avoidance of effects in the first place and will reliably mitigate these effects where these cannot be avoided. In addition, any lower level plans and projects arising through the implementation of the plan will themselves be subject to relevant stages of Appropriate Assessment when further details of design and works are known.

Having incorporated these mitigation commitments; it is considered that the proposed amendments to the North Lotts and Grand Canal Dock Planning Scheme are not foreseen to have any likely significant effects on the ecological integrity of any European Site.
Urban scale and building height review

North Lotts and Grand Canal Dock
Planning Scheme, 2014.

Report
May, 2019
<table>
<thead>
<tr>
<th>Document details and history</th>
</tr>
</thead>
<tbody>
<tr>
<td>Job</td>
</tr>
<tr>
<td>Date</td>
</tr>
<tr>
<td>Author/check</td>
</tr>
<tr>
<td>Issued to</td>
</tr>
<tr>
<td>Purpose</td>
</tr>
<tr>
<td>Format</td>
</tr>
<tr>
<td>Version</td>
</tr>
</tbody>
</table>
# Report contents

1. Introduction
2. Building height guidance and policy
   2.1. National Planning Framework, 2018
   2.2. Planning Guidelines (PGs)
   2.3. Urban Development and Building Heights (DHPLG, 2018b)
   2.4. Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities, 2009
   2.5. Urban Design Manual, 2009
   2.6. Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities, 2007
   2.8. Sustainable Urban Housing; Design Standards for New Apartments – Guidelines for Planning Authorities, 2018
   2.9. Other guidelines
   2.10. Local level policy and plans
3. Best practice in urban design
   3.1. Building height and density
   3.2. General context and urban character
   3.3. Landmark buildings
   3.4. Street enclosure
   3.5. Quality of public spaces
   3.6. Sustainability and adaptability
   3.7. Comparable best practice places
4. Performance criteria for urban scale and building height
5. Overall review of urban scale and building height
   5.1. To ensure a shared vision within a plan-led process
   5.2. To protect and promote the essential urban context and character/sense of place
   5.3. To provide high levels of local and wider-area legibility
   5.4. To provide appropriate continuity and enclosure of streets and spaces
   5.5. To provide well-connected, high quality and active public spaces
   5.6. To provide high quality, attractive and useable private spaces
   5.7. To promote mix of use and diversity of activities
   5.8. To secure sustainable density, intensity at locations of high accessibility
   5.9. Detailed recommendations
6. Recommendations for revisions building height controls

References
Appendix
1. **Introduction**

Dublin City Council (DCC) requested Loci to provide urban design and masterplanning services relating to their review of building heights of the North Lotts and the Grand Canal Dock Planning Scheme, 2014 (PS). In response to the DCC brief, this report addresses:

- Principles and policy around urban scale and height;
- Best practice urban design;
- Review of overall urban scale and building heights in the Planning Scheme; and
- Recommendations for changes to building height in the Planning Scheme.

The report is structured as follows:

- Building height policy and guidance – focusing on the most relevant policy, guidance, plans and best practice;
- Key performance criteria for urban scale and building height – these are derived from the policy, guidance, statutory plans and best practice summarised in this report;
- Review of urban scale and building height in the area – including a review of the development of the area since 2014;
- Recommendations for revisions to building height controls – including broader and more specific recommendations for changes to building height controls in the Planning Scheme.

Figure 1. The higher building cluster at Bolands Mill/Inner Grand Canal Dock.

2. **Building height guidance and policy**

This section provides a summary of relevant policy and guidance relating to urban scale and building height. Relevant policy on building height for the PS is found at National, regional, city and local level as follows:
- The National Planning Framework (NPF, DHPLG, 2018a) and Planning Guidelines at national level – these set out general policy and approaches to urban development, scale and building height;
- The Regional Spatial and Economic Strategy for the Eastern and Midland Region (The Eastern and Midlands Regional Assembly, 2019) - this sets out broad regional objectives for urban development and includes a Metropolitan Area Spatial Plan (MASP) for Dublin;
- The Dublin City Development Plan, 2016-2022 (Dublin City Council, 2016) sets out the city-wide policy and objectives for the Docklands, and the North Lotts and Grand Canal Dock Strategic Development Zone Planning Scheme (Dublin City Council, 2014) sets out the detailed planning guidance and controls for the area.

2.1 National Planning Framework, 2018

The National Planning Framework (DHPLG, 2018a) has a number of relevant national policy objectives (NPOs) that articulate a sustainable approach to settlement strategy and urban development. The NPF highlights the need for compact growth (NPO2a), generally increased intensity and density of development (residential and commercial) in key areas (NPO6), proper use of brownfield resources with targets (NPO3 a, b and c), and the creation of attractive, well-designed and livable neighbourhoods (NPO 4), of adequate scale and quality (NPO5).

NPO13 is notable in requiring a performance-based approach to matters such as building height, subject to high quality outcomes, public safety and the environment. It states:

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

2.2 Planning Guidelines (PGs)

Planning Authorities and An Bord Pleanála are required to have regard to planning guidelines and to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1c) of the Planning and Development Act 2000, as amended, in carrying out their functions. SPPRs take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans/schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and to properly inform the public of the relevant SPPR requirements.

Current PGs of particular relevance to this review are:

- Urban Development and Building Heights: Planning Guidelines for Planning Authorities (DHPLG, 2018b);
- Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DEHLG, 2009a) and the accompanying Urban Design Manual: A Best Practice Guide. (DEHLG, 2009b);
- Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities, DCLG, 2007;
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (DHPLG, 2018c); and
- Design Manual for Urban Roads and Streets (DTTS and DECLG, 2013);
2.3 Urban Development and Building Heights (DHPLG, 2018b)

These guidelines were issued to support national policies on compact urban development and long-term, strategic development. They outline wider, strategic policy considerations and a performance criteria approach (s.1.6). The guidelines require that increased building height be considered in all urban contexts, subject to ensuring the highest standards of urban design, architectural quality and place-making outcomes (s.1.3). The guidelines emphasise the importance of securing effective mixed use (including residential development) in higher density development (s.1.19).

The guidelines also highlight the need to consider complementary policy and guidance, notably; Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (DHPLG, 2018c), Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DEHLG, 2009a) and the accompanying Urban Design Manual: A Best Practice Guide. (DEHLG, 2009b) and Design Manual for Urban Roads and Streets (DTTS and DECLG, 2013).

In relation to development plans, the PGs acknowledge the non-linear relationship between height and density, stating that (s.2.3): ‘While achieving higher density does not automatically and constantly imply taller buildings alone, increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability.’

The guidelines are principally aimed at statutory development plans that have been (s.2.6) ‘…overly restrictive maximum height limits in certain locations and crucially without the proper consideration of the wider planning potential of development sites and wider implications of not maximising those opportunities…’ and they now require development plans to be (s.2.7): ‘…more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights, while also being mindful of the quality of development and balancing amenity and environmental considerations.’

Loci believe that the approach to planning and controlling building height and urban density has been very successful in the context of the Docklands, more generally, and the North Lotts and Grand Canal Dock, more specifically.

The guidelines provide an important safeguard for dealing with the impact of height on historic areas (s.2.8) highlighting that ‘…an examination of the existing character of a place can assist planning authorities, and others to: establish the sensitivities of a place and its capacity for development or change and; define opportunities for new development and inform its design.’ The guidelines also state that (s.2.9) ‘…an urban design statement addressing aspects of impact on the historic built environment should be submitted along with a specific design statement on the individual insertion or proposal from an architectural perspective addressing those items outlined above.’

The guidelines contain three specific planning policy requirements (SPPRs) of particular relevance to this study:

**SPPR1**

‘In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.’

Dublin City Council have explicitly identified areas where increased building height, will be actively pursued. This is evidenced by policies emanating from late 1990s, including Maximising the City’s Potential: A Strategy for Intensification and Height (DEGW, 2000), and subsequent statutory development plans, which identified areas of potential for taller buildings in key locations in the city.
including the Docklands. Further, a non-generic, place-specific strategy for height through the PS has been applied to the North Lotts and Grand Canal Dock area. However, the City Development Plan includes blanket height limits in some parts of the city. This would appear to be inconsistent with the Guidelines and indicates that the Development Plan will require a city-wide review urban scale and building height.

**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. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.’

The PS has ensured an appropriate mix and distribution of mixed use and the Block Delivery Objectives of the North Lotts and Docklands Planning Schemes of Dublin City Council are specifically referenced in this SPPR (Footnote 2) as a good example.

In relation to development management, the PGs sets out a range of criteria for the assessment of projects:

- At the scale of the relevant city/town;
- At the scale of district/ neighbourhood/ street; and
- At the scale of the site/building.

While the criteria a provided for the development management process, rather than the plan-making process, they will be used in this report to inform this report’s collation of performance criteria. The scale of the relevant city/town and the scale of district/ neighbourhood/ street categories are particularly relevant to the PS and are addressed this review (Sec Table 1 in Appendix A for more detail). The scale of the building category is also relevant with regard to daylight, ventilation, views, overshadowing and loss of light, and appropriate and reasonable regard to quantitative performance approaches to daylight provision, although these elements can only be considered in a more general manner in the PS. The relevant criteria are included in the performance criteria for urban scale and building height in Section 4 of this review.

**SPPR 3**

It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise. (B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme (C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.

This review is being carried out on foot of SPPR3, and the criteria as set out are integrated as appropriate into a comprehensive set of urban design performance criteria (drawn from planning guidelines, plan policy, best practice and the PS), which is used to evaluate the approach to urban scale and the building heights as currently contained in the PS.

J439 www.loci.ie
2.4 Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities, 2009

These guidelines provide overarching and comprehensive guidance for residential development. Urban Development and Building Heights (DHPLG, 2018b) should be read in conjunction with these guidelines. The guidelines are supported by the accompanying Urban Design Manual (DEHLG, 2009b), which provides detailed criteria to be considered in the design of residential development. The guidelines deal with higher density development (mainly apartment development) issues and relevant factors including acceptable building heights, avoidance of overlooking and overshadowing, provision of adequate private and public open space, including landscaping where appropriate and safe play spaces, adequate internal space standards in apartments, suitable parking provision close to dwellings, and provision of ancillary facilities, including childcare. These guidelines were taken into account in the preparation of the PS.

The guidelines do not provide guidance on general urban scale, but they address the development of taller buildings (s.5.3), and require particular sensitivity in relation to the design and location of apartment blocks which are higher than existing adjacent residential development. As a general rule, where taller buildings are acceptable in principle, building heights should generally taper down towards the boundaries of a site within an established residential area.

The guidelines also suggest (s.5.3) that Planning Authorities in cities and larger towns should also ‘…consider whether a buildings heights strategy, involving public consultation as part of a statutory plan process, would provide clearer guidance for potential developers on where, and in what circumstances, taller residential buildings would be appropriate within their areas.’

The guidelines address the issue of increased densities in different contexts. Locations such as Dublin Docklands would be included in the ‘brownfield’ category of the guidelines (s.5.7). The guidelines state that ‘Where such significant sites exist and, in particular, are close to existing or future public transport corridors, the opportunity for their re-development to higher densities, subject to the safeguards expressed above or in accordance with local area plans, should be promoted, as should the potential for car-free developments at these locations.’ The guidelines state (s.5.6) that ‘…there should, in principle, be no upper limit on the number of dwellings that may be provided.’ in city and town centre areas.

Important safeguards are included in s.5.6 and are as follows:
- ‘compliance with the policies and standards of public and private open space adopted by development plans;
- avoidance of undue adverse impact on the amenities of existing or future adjoining neighbours;
- good internal space standards of development;
- conformity with any vision of the urban form of the town or city as expressed in development plans, particularly in relation to height or massing;
- recognition of the desirability of preserving protected buildings and their settings and of preserving or enhancing the character or appearance of an Architectural Conservation Area; and
- compliance with plot ratio and site coverage standards adopted in development plans.’

The guidelines further identify ‘acceptable building height’ as an important criterion to be considered in design, which is to be further addressed in the accompanying Urban Design Manual, 2009. What constitutes ‘acceptable building height’ is not, however, specifically addressed in the Urban Design Manual (DEHLG, 2009b).

In summary, the guidelines provide a basis for a more comprehensive, performance-based assessment of building height for residential (and mixed use) development. They recognise the role of areas such as the Docklands as brownfield areas where higher density can be achieved, subject to important safeguards. The guidelines reinforce the role and importance of a vision of the urban form of the town or city as expressed in development plans, and compliance with proper standards for plot
ratio and coverage. They also set out important ‘safeguards’ which must be considered in planning for increased urban scale and building height.

### 2.5 Urban Design Manual, 2009

The *Urban Design Manual* (DEHLG, 2009b) is the companion guide for *Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities* (DEHLG, 2009a). The manual is based around 12 Criteria (with indicators) at three different spatial scales (neighbourhood, site and home) that have been drawn up to encapsulate the range of design considerations for residential development. The Manual promotes increased densities of appropriate mix and density, of quality design and with appropriate connections to transport. It also suggests that increases in scale should be gradual with transition from established, existing urban scale, with taller buildings located away from the edge of the area.

In relation to urban scale, the Manual suggests that:

- Urban context and connections should inform mixed use and appropriate density and will require quality of design.
- Buildings, gardens and public spaces should be laid out to exploit the best solar orientation.
- Views, local landscape and urban form and focal spaces are essential in achieving distinctiveness.
- Good street and space interface is necessary to integrate design of buildings and public space.
- Units should be adaptable and energy efficient to address climate change (including passive solar gain).
- Privacy and amenity are important considerations along with aspects of detailed building design and managing car parking.

Notably, under efficiency the Manual states that (p.43), ‘…designers will need to consider how the homes can be designed to make the best use of passive warmth and light provided by the sun though solar orientation. As well as orientating homes to take advantage of solar gain, areas of open space should also be sited to take advantage of sunlight, communal or district CHP and renewable power generation.’

The most relevant aspects of the criteria and indicators in the Manual are included in Table B1, Appendix B. These aspects are also integrated into the performance-based assessment in this review (Section 4).

### 2.6 Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities, 2007

These guidelines covers a range of aspects of guidance for housing, covering the initial briefing stage to the management of the completed project. While the guidance does not provide any generic guidance on urban scale or building heights, it does defer to the Local Area Plan or Development Plan on these matters.

The guidance recognises the importance of building size and scale (s.3.4, p.24) stating ‘The size, configuration and scale of a development in relation to its surroundings, has a bearing on its:

- sustainability (in terms of energy efficiency and adaptability);
- relationship with the surrounding urban structure; and
- contribution to neighbouring public space and streetscapes.’

The guidance also deals with a comprehensive range of aspects of layout and design including the role of the local area plan, the design approach, building sustainable communities, design for sustainability, design for safety and security accessibility, vehicular and pedestrian circulation, services, community facilities and the public realm. The guidance recommends (s.4.2, p.30) that architects should ‘…promote the concepts of enclosure, clear separation of public/private realm and
good permeability as the means to achieve a high quality living environment.’ It also recognises the importance of scale in the enclosure and framing of urban space.

The role of apartments in providing housing in many cities and towns is also recognised. The guidelines recommend that special attention be given (s.4.3.6) to: ‘Disposition of apartment buildings on site and the relationship between heights of buildings and distances between them so as to provide;
- maximum opportunity for dual aspect and cross ventilation for habitable rooms;
- an adequate amount of public open space and useable private space; and
- acceptable views from habitable rooms and apartments while maintaining a satisfactory degree of privacy.’

In relation to sustainability (s.4.4.1) the guidance recommends: ‘…achieving energy efficiency both at construction stage and during the lifetime of the scheme, e.g., by climate sensitive design which takes account of the orientation, topography and surrounding features so as to control wind effects, while optimising the benefits of daylight and solar gain;’

In relation to microclimate (4.4.2), the guidance addresses wind, and daylight and sunlight. It recommends that designers have regard to: ‘…scope for optimising daylighting and solar gain for dwellings, through the disposition and orientation of buildings;’ and ‘…the scope for optimising the advantages of shelter and direct sunlight through the location and orientation of play areas, courtyards and gardens, relative to existing features such as buildings, walls, trees, hedges, both on and adjacent to the site;’

The guidance highlights matters, which are important considerations in considering urban scale and building height. The guidance is general nature, highlighting important relationships between scale, building height, orientation and distance between buildings and important issues such as access to sunlight and overshadowing, and wind.

2.7 Design Manual for Urban Roads and Streets, 2013

The Design Manual for Urban Roads and Streets (DTTS and DECLG, 2013) provides comprehensive guidance for the assessment of streets and roads, design of networks, classification, and detailed design. It combines technical street design guidance with more general elements of urban design. Building height and urban scale are an important part of street and space design and are considered under the heading of streetscape (s.4.2). More specifically, DMURS describes the important relationship between building height and street width, and it crucial role in providing enclosure of streets and spaces.

DMURS states (s.4.2.1): ‘Enclosing streets with buildings helps to define them as urban places, creates a greater sense of intimacy and promotes them as pedestrian-friendly spaces that are overlooked. This sense of intimacy has been found to have a traffic-calming effect as drivers become more aware of their surroundings.’

The sense of enclosure is closely related to urban context. DMURS states (s.4.2.1) that:
‘Designers should seek to promote/maintain a sense of enclosure on all streets within cities, towns and villages (see Figure 4.7). In this regard:
- A strong sense of enclosure should be promoted in large centres. The most effective way of achieving this is with a building height to street width ratio greater than 1:2 and street wall that is predominantly solid (allowing for intermittent gaps only).’
DMURS expands on the dynamic relationship between height and width (4.2.1):

‘The relationship between building height and street width is also key to creating a strong urban structure, by increasing building heights in proportion to street widths. This will also promote greater levels of sustainability and legibility by placing more intensive development along wider/busier streets, such as Arterial and Links streets, to support public transport routes and highlight their importance as connecting routes, respectively. Additional building height may also be used at junctions to create a ‘book end’ effect. This approach will assist in slowing vehicles as they approach junctions and will improve legibility by highlighting connecting routes throughout the network.’

While DMURS does not mention maximum enclosure ratios, it does suggest a maximum ratio of 1:1 to provide for very strong enclosure, with a minimum of 1:2 to retain street enclosure. It should be noted that it is almost universally accepted that a consistent and continuous ratio of <1:1 is likely to create a sense of overbearing, and in the extreme case a ‘canyon effect’ in the case of medium to high density and scale. It is also likely to raise issues around adequacy of street space, daylighting and sunlitng and privacy.

2.8 **Sustainable Urban Housing; Design Standards for New Apartments – Guidelines for Planning Authorities, 2018**

The guidelines update the *Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities* (DECLG, 2015) (some aspects remain in operation) and are also to be read in conjunction with other, related guidelines. The guidelines recognise the suitability of apartments in central and accessible locations (s.2.4) and promote performance-based standards to ensure well-designed high quality outcomes (s2.23). They also reference issues around building height and separation distances and a need for more flexible approaches here.

The guidelines include important standards and safeguards for building and space design, including requirements to:

- Deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, such as in SDZ areas (s.3.17). This will have an impact on urban block sizes, if corridor typologies are prevalent along perimeter block frontages.
- Enable a greater proportion of smaller unit types and increasing the maximum number of apartments per floor to 12 per individual stair/lift core. This may impact on the number and
frequency of entrances at ground floor, and the nature and quality of the street/building/interface.

- Provide private amenity space in the form of gardens or patios/terraces for ground floor apartments, and balconies at upper levels (s.3.35). Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Private amenity space should be located to optimise solar orientation and designed to minimise overshadowing and overlooking.

Notably, the guidelines promote the perimeter block and the benefits of central residential courtyards (s.4.14), with particular reference to the needs of children (s.4.13) and states (s.4.11):

Communal amenity space may be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year. Roof gardens may also be provided but must be accessible to residents, subject to requirements such as safe access by children. These facilities offer a satisfactory alternative where climatic and safety factors are fully considered, but children’s play is not passively supervised as with courtyards. Regard must also be had to the future maintenance of communal amenity areas in order to ensure that this is commensurate with the scale of the development and does not become a burden on residents.

In relation to development management, the guidelines address the provision of reasonable levels of natural light in new apartment developments (s.6.5), recognising it as ‘…a an important planning consideration as it contributes to the liveability and amenity enjoyed by residents.’ They state that: ‘In assessing development proposals, planning authorities must however weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision with the location of the site and the need to ensure an appropriate scale of urban residential development.’ It also states (s.6.6) that: ‘Planning authorities should have regard to quantitative performance approaches to daylight provision outlined in guides like the BRE guide ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’ when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision.’ And (s.6.7) ‘Where an applicant cannot fully meet all of 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, which planning authorities should apply their discretion in accepting taking account of its assessment of specific. This may arise due to design constraints associated with the site or location 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.’

While these development management provisions do not relate directly to the plan-making process, they are relevant in a more general sense to masterplanning for planning schemes.

2.9 Other guidelines

Other planning guidelines are of more general relevance to this review and may be important when considering other issues, such as retail development, childcare, flood risk management, architectural heritage, general development management and development plan processes.
2.10 Local level planning policy and plans

**Dublin City Development Plan 2016-2022 (DCDP)**

The Dublin City Development Plan (DCDP) provides general policy and guidance on urban scale and building height for the functional area of Dublin City Council and policy relating specifically to urban scale in the Docklands. The DCDP considers building height and urban scale as part of its policies on the shape and structure of the city. The DCDP recognises the fundamentally low-rise nature of the city and the importance of protecting the inner city skyline. It also recognises the potential of taller buildings, in planned and coherent manner and in selected locations. The plan also includes some blanket height limits in certain areas outside the SDZ areas.

The following DCDP policies are of note:

SC16: To recognise that Dublin City is fundamentally a low-rise city and that the intrinsic quality associated with this feature is protected whilst also recognising the potential and need for taller buildings in a limited number of locations subject to the provisions of a relevant LAP, SDZ or within the designated strategic development regeneration area (SDRA).

SC17: To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city, having regard to the criteria and principles set out in Chapter 15 (Guiding Principles) and Chapter 16 (development standards). In particular, all new proposals must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas, open recreation areas and civic spaces of local and citywide importance.

SC18: To promote a co-ordinated approach to the provision of tall buildings through local area plans, strategic development zones and the strategic development and regeneration areas principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline.

The DCDP designates the SDZ and Wider Docklands Area as a Strategic Development and Regeneration Area. The guiding principles, including social, economic and environmental objectives, for the Docklands are contained in Chapter 15 (s.15.1.1.6 SDRA 6 Docklands).

**The North Lotts and Grand Canal Planning Schemes, 2000 – 2014**

The approach to urban scale and building height in the Docklands has evolved since the initial Custom House Docks Development, initiated by the Custom House Docks Development Authority in 1987. The extension of the Docklands Area and the establishment of the Dublin Docklands...
Development Authority in 1997, resulted in the preparation of various Docklands Masterplans, Area Action Plans and SDZ Planning Schemes. The Planning Schemes provided prescription around building height. The following Planning Schemes were prepared by the Dublin Dockland Development Authority for the area:

- Grand Canal Docks Planning Scheme, 2000 and Grand Canal Amending Planning Scheme, 2006; and
- Docklands North Lotts Planning Scheme, 2002 and Docklands North Lotts Amending Planning Scheme, 2006.

In general terms, the planning schemes provided for medium to high-density development (typically within a plot ratio of between 2.0:1 and 3.0:1) within a permeable perimeter block structure based on the underlying orthogonal, historic block pattern of the docklands. Building heights reflected accessibility, location and route structure. Building height for main routes were generally in the range of 5-6 commercial storeys and 6-8 residential storeys (with potential for set-back floors), with height dropping down to 3-4 storeys in some smaller streets and internal spaces (in the case of Grand Canal Dock. Locations were also designated for lower and higher landmark buildings (at Sir John Rogersons Quay/Britain Quay and Grand Canal Dock Station in the Grand Canal Docks and Point Square and Station Square).

Figure 4. Height controls for Grand Canal Dock Planning Scheme, 2000
These planning schemes were replaced in May 2014, by Dublin City Council (as the new Development Agency), by a combined Scheme for the area; the North Lotts and Grand Canal Dock Strategic Development Zone Planning Scheme. The Planning Scheme sets out a detailed framework for the development of the entire area comprising 20 city blocks. The remaining undeveloped city blocks were mainly in the North Lotts area and then comprising some 22 hectares of the total 66 hectares of the Planning Scheme area (Figure 6). The Planning Scheme provided for:

- Up to 366,000sqm of commercial development (providing up to 23,000 new jobs) and
- Up to 2,600 new residential units (an estimated additional population of 5,800).

The scheme also includes new infrastructure such as bridges and drainage, parks and public spaces, and the upgrading of the Campshires and new activity on the river and the canal basins.
The Planning Scheme city blocks are in effect large ‘super-blocks’, which are further broken down into smaller, urban blocks of appropriate development scale. These smaller blocks were designed as perimeter blocks, with good continuity and appropriate enclosure of public streets and spaces, and appropriately-scaled internal courtyards for commercial, residential and mixed uses. The Planning Scheme includes detailed objectives and controls for each of these blocks in the areas of use mix, heights, building lines, and the location of new lanes, streets and open spaces.
The underpinning, urban design structuring principle of the scheme is the development of five hubs within the area. These are at Grand Canal Square, Boland’s Mills, Britain Quay, Spencer Dock and Point Square. These hubs are locations of higher intensity, and build on the existing success of Docklands as a centre of ICT, innovation, finance and create the attractive high-quality spaces to expand and develop these sectors. DCC has completed a series of studies and strategies since 2014, including a Public Realm Strategy and an updated Community and Recreation Audit.

Since 2014, development has progressed rapidly in the North Lotts area. As of May 2019,
- 7 city blocks were complete;
- 4 city blocks were substantially complete;
- 3 city blocks were commenced; and
- 6 city blocks were not commenced.

In addition, work has been completed, or is in progress, on key public streets and spaces, such as North Wall Avenue and Chocolate Park. DCC is in the process of rationalising bridge connections between the North Lotts area and the Grand Canal Dock, and the public transport bridge connecting with Ringsend at Sir John Rogerson’s Quay/Britain Quay is progressing towards construction.

An analysis by DCC (April 2019) shows that permission has already been granted for 2,200 residential units (which is 85% of the PS target of 2,600). The analysis also shows that indicative commercial capacity of 305,000-366,000sqm as set out in the PS, has already been exceeded by 37,000sqm. The analysis indicates that the final developed state of the area will significantly exceed PS expectations. It is considered that the allowance for additional floors and flexible internal building lines, allowing for increased footprints, have been central to exceeding targets.

**Building policy and controls**

The PS requires appropriate transition in scale and character central to integration of existing fabric and new fabric and the different streets and typologies of proposed housing (s.4.2.4.7) and consideration of location of important views and vistas, which will have a bearing on decisions around scale (see Figure 7. Figure 18 of the PS).

The PS describes the concept of the development of the 5 hubs (s.4.10.4). The PS includes Assessment Criteria for High Buildings reflecting those set out in the Development Plan. The PS concluded that the previous Planning schemes employed (p.131) ‘a general height of 4/5 to 8 storeys, which works well in integrating different uses, and achieving a legible dense urban
structure, comparable to the traditions of the European city.’ It further proposed to continue with this general approach to urban scale and building height. The PS identifies The Point and Station Square as locations of higher accessibility, where more than 8 storeys would be appropriate (10-12 storeys).

A guide maximum plot ratio of 3.0:1 (s.4.10.8) is included in the PS, with densities in excess of this very carefully considered against impacts on amenity and streetscape, and only in certain circumstances in the 5 hubs.

Chapter 5 provides the Detailed Code, which:
- Establishes important street typologies with width ranges and sections (Figure 31).
- Provides overall extent and height of buildings (Figure 35). Heights are controlled four categories; Landmark buildings (local and distant in nature with specific details provided for each); 8 storeys commercial or 10 storeys residential; 6 storeys commercial or 7 storeys residential; and 5 storeys commercial or 6 storeys residential.

The PS also sets out general provisions for height and their relationships to streets and spaces (s.5.4.5) and provides the rationale and approach to design for additional scale to the quays.

**Additional urban scale at hubs**
The PS makes provision for additional height at four of the hubs – with 22 storeys at Point Square and Britain Quay, 15 storeys equivalent at Bolands Mill and some increase in urban scale at Station Square (<12 storeys to protect Georgian mile vista). The PS also prohibits buildings more than 2 storeys less than the identified height.

**Set-back additional floors**
Provision is also made for an additional set-back floors in most blocks subject to assessment (except City blocks 1-5). Locally, some provisions are included in the code to scale to down to existing, adjoining or adjacent, building. The PS states (p.174): ‘In addition to the setbacks which may be necessary for design and amenity reasons within the height envelope in Fig. 35, an additional storey, with a setback of 1.5m plus may be considered subject to a shadow analysis and a compelling urban design rationale.’

**City block diagrams and shadowing**
City block diagrams and shadowing are presented in the PS although (s5.4.5: p.174), ‘It must be stressed that the City Block diagrams and indicative 3D model are not final designs.’ The PS concludes that: ‘The 3D model includes a shadow diagram to demonstrate that overall the blocks are generally appropriately scaled in relation to the street structure and distance between blocks.’

**Existing buildings**
Building height for the redevelopment of existing buildings is also covered in the PS (s.6.1.2). The PS requires that any new building or additional height to existing buildings shall relate to the prevailing height as set out in the relevant City Block or adjacent blocks in the Development Code.
3. **Best practice in urban design**

Key objectives of urban design and the essential considerations around urban scale and building height are addressed in some detail in established and acknowledged international best practice guidance and publications. Best practice addresses key objectives for urban design and the importance of urban scale and building height to these objectives. Some of the key issues and considerations from selected best practice guidance and publications are described below.

3.1 **Building height and density**

Best practice considers the relationship between building height of urban density. ‘Density is considered as just one aspect of built form. Building height, block size and building typology will all affect the character of an area and the perceptions of density (English Partnerships, 2000).

Increased height does not necessarily result in increased density (English Partnerships, 2000; and Corporation of London and CABE, 2005). Cheng (2009: p.10) has argued that increased building height will lead to reduced plot ratio in locations of low sun obstruction, assuming reasonable controls for daylight and sunlight are maintained. (Note: Dublin would fall into this category with its low solar obstruction angle/maximum solar elevation).

English Partnerships (2007: s.2.4.2) state: ‘High buildings can be less efficient in terms of the ratio of net to gross areas. Nor does a building need to be tall to be a landmark. The contribution that a tall building makes to the look of the street will depend on how it meets the ground.’ In addition, higher density must be appropriate to context, quality of design and materials and quality of public spaces (English Partnerships, 2007).

The Corporation of London and CABE (2005) argue that a successful high density scheme is a combination of many factors, including: ‘…good quality units (insulation, private outside spaces - balconies etc.), connectivity, scale and integration with surrounding areas, proximity to good public transport, priority for pedestrians and cyclists, high quality open space for visual relief and recreation, clear demarcation between public and private spaces, adequate car parking, that does not dominate public space.’
3.2 General context and urban character

Best practice guidance addresses general context and urban character as essential in the consideration of urban scale and taller buildings. High building is often a reflection of many factors including market demand, accessibility, site availability, and urban character (Worthington, 2002). Building height and massing are important aspects of urban scale and overall urban form with potentially positive and negative impacts on views and vistas and skyline. The character of a skyline is composed of the massing of blocks and the shape of roofs, as well as by the height of buildings (DETR, 2000). The skyline created by the roofs of buildings not only adds visual interest, but also conveys particular activities (churches or civic centres, for instance) and concentrations of uses (such as clusters of office buildings indicating the business centre) (English Partnerships, 2000).

For many urban situations, medium-rise buildings provide an optimum form, because of their ability to accommodate a range of uses, (which generally decreases beyond four storeys), the potential for medium-high densities, as well as generally lower energy demands and construction costs. (English Partnerships, 2000).

3.3 Landmark buildings

High-rise buildings can be used to emphasise key locations - rising above areas with a more uniform profile. Tall buildings have a positive role to play in signifying locations of civic commercial or visual importance, or focal points of urban activity (English Partnerships, 2000). A building should only stand out from the background of buildings if it contributes positively to views and vistas as a
landmark. Buildings which have functions of civic importance are one example (DETR, 2000). Local landmarks, such as corner buildings can provide identity and points of orientation. Making them higher than the surrounding buildings will emphasis their importance (DETR, 2000).

3.4 Street enclosure

Street width and building scale have an important relationship with each other and must be considered in tandem (DETR, 2000). Streets and spaces should be scaled to foster a sense of urbanism so that streets, squares and parks are defined by appropriately scaled buildings (English Partnerships, 2000; DETR, 2000; English Partnerships, 2007). English Partnerships (2000) recommend enclosure ratios (street width to building height) of 1:1.5 to 1: 1.3 for streets, 1:1 to 1:1.5 for mews and 1:1.4 to 1:1.5 for squares. Notably, these are more generous widths and ranges than suggested by DMURS (DTTS and DECLG, 2013).

3.5 Quality of public spaces

Urban scale and building height have an important relationship with public spaces and street life (English Partnerships, 2000). Public spaces should be protected from downdraughts from tall buildings, as well as from lateral winds (DETR, 2000). Meaningful contact between buildings and public space can only be sustained at lower levels of up to 5 or 6 storeys (Gehl, 2001). Loss of outdoor life and reduced ‘outdoor hours’ and summer season (by up to two months) can result from poor sunshine and wind conditions caused by overscaled buildings.

3.6 Sustainability and adaptability

Taller building give rise to concerns about sustainability, notably in relation to solar gain, heat loss to other buildings and spaces, and environmental performance of nearby buildings. (English Partnerships, 2000). In our climate, access to sunlight (solar gain) is important, and in general terms ‘the more sun the better’ (Schmidt III & Austin, 2016; Roaf, 2005). With good urban and building design, high levels of penetration can be achieved in high-density contexts, with careful consideration of roofscape and building height (English Partnerships, 2000). Other microclimatic issues relate to the spacing of buildings and blocks and development of stand-alone high buildings and include wind (downdraft, eddies and channelling), building heat loss and frost pockets (English Partnerships, 2000; DETR, 2000; Gehl, 2001).

3.7 Comparable best practice places

While all places are unique and present many different characteristics and contexts, it is useful to draw more general conclusions from successful places that are, to some degree, comparable. Case examples should be drawn from comparable places which have undergone transformation to a new mixed use model.

A comparable place would be a capital city of similar size in a smaller nation state, be part of an open, mixed economy, have a northerly latitude, and a similar urban context (i.e. former docklands in close proximity (not peripheral ports) to the established city centre).

The following are useful examples:

Amsterdam KNSM Eiland

This is a masterplanned area for mixed use, former docklands regeneration area, north-east of Amsterdam City Centre, comprising approximately 60 hectares. It has a general urban scale of between 4-6 storey commercial and 6-7 storeys residential, within a general building height range of 3-16 storeys. It includes a small number of occasional, taller buildings of 10 and 16 storeys. Development is based on a perimeter block typology, with plot ratios of between 1:1 and 2:1. The development of the area commenced in the mid-1990s and was largely completed by 2005.
This is a masterplanned, mixed use, former docklands regeneration area south-west of Helsinki City Centre, comprising approximately 100 hectares. It includes a general urban scale of between 4-6 storey commercial and 6-7 storeys residential, within a general building height range of 3-16 storeys. There are a few occasional, taller buildings of 10 and 16 storeys. Perimeter block typology, with plot ratios of between 1:1 and 2:1. Development commenced in 2009 and will be completed by 2030.
Copenhagen – Amerika Pladz and Nordhavn
This is a masterplanned, mixed use, former docklands regeneration area north of Copenhagen City Centre. It includes a general urban scale of between 6-7 storeys residential/4-6 storeys commercial, within a general building height range of 3-16 storeys. There are occasional, taller buildings at prominent locations. Development is generally in a perimeter block typology, with plot ratios of between 1:1 and 2:1. Construction of Amerika Pladz commenced in the 1990s and this was followed by Nordhavn, which will be completed in 2040.
Figure 13. Amerika Plads, Nordhavn, Copenhagen (Image source: Google)

Figure 14. Nordhavn, Copenhagen (Image source: Google)
Figure 15. Nordhavn, Copenhagen (Image source: Google)

**Copenhagen - Sydhavn**
This is a masterplanned, mixed use, former docklands regeneration area adjacent to Copenhagen City Centre. It has a general urban scale of between 6-7 storeys residential/5-6 storeys commercial, within a general building height range of 5-10 storeys. The taller buildings are occasional tower buildings. Development is in a perimeter block typology, with plot ratios of between 1:1 and 2:1.
Figure 16. Aerial view of Sydhavn (Image source: Google)

Figure 17. Sydhaven (Image source: Sydhavnen/sluseholmen copenhagen Harbour renovation project 2000-2009)
HafenCity, Hamburg

This is a masterplanned, mixed use, former docklands regeneration area adjacent to Hamburg City Centre, comprising approximately 157 hectares. It has a general urban scale of between 5-9 storeys residential/5-8 storeys commercial, within a general building height range of between 5 and 20 storeys. The higher buildings are few in number and operate as occasional, landmark tower buildings. HafenCity utilises a mixed urban block typology. Development of the area commenced in 2000 and will be completed between 2025 and 2030.
Some key points emerge from these case examples:

- These areas have been, or are, the subject of comprehensive and prescriptive plans, including detailed masterplanning;
- A coherent urban scale is prevalent, and this is typically within the human scale (generally, 6 storeys or less);
- The perimeter urban block typology is the favoured block type, as it provides continuous and enclosed streets and spaces, which combined with human scale results in generous, quality internal courtyards for residential and commercial development.
- Tall buildings are most often used as single tall buildings as ‘distant’ and local landmarks, signifying important locations in the area.
- Tall building clusters are not used in a residential or mixed use context (these are normally present in larger cities in larger economies, and they are most often associated with single or narrow use commercial precincts).
- The PS includes heights at the higher end of building ranges in the selected case examples. In comparison with the case examples, the PS has delivered a high density of development.
4. Performance criteria for urban scale and building height

The NPF and recent planning guidelines (DHPLG, 2018a and 2018b) have emphasised the need to use performance criteria as opposed to generic or blanket controls when considering building heights. Accordingly, a set of urban design, performance criteria for urban scale and building height is presented here. It is drawn from:

- Relevant planning guidelines;
- Statutory plans, including the City Development Plan and the PS (notably, Appendix 5); and best practice in urban design.

The criteria provide the framework for the assessment and the recommendations for urban scale and building heights for the Docklands North Lotts and Grand Canal Dock Planning Scheme, 2014.

The performance criteria are overlapping and interrelated and they are organised within larger, urban design objectives. A more detailed table with references is included in Appendix C, Table C1.

Table 1: Urban design performance criteria for urban scale and building height

<table>
<thead>
<tr>
<th>Urban design objectives</th>
<th>Performance criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>To ensure a shared vision within a plan-led process.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should be considered as part of a larger, area-based vision or building heights and skyline strategy, involving public consultation within a statutory plan process.</td>
</tr>
<tr>
<td>2</td>
<td>To protect and promote the essential urban context and character/sense of place of the area.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should respect and/or complement existing and established surrounding urban structure, character, urban scale and built and natural heritage.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should reflect the importance and the function of places. Increased urban scale should be located in central locations, such as highly accessible focal spaces and places of greater activity and land use intensity.</td>
</tr>
<tr>
<td></td>
<td>Additional urban scale and building height should generally ‘taper down’ to the boundaries of a site/adjacent development in an established area.</td>
</tr>
<tr>
<td></td>
<td>In proposing additional urban scale and building height, the highest standards of urban design, architectural quality and place-making outcomes should be achieved.</td>
</tr>
<tr>
<td>3</td>
<td>To provide high levels of local and wider, area legibility.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should make a positive contribution to legibility in an area in a cohesive manner.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should provide variety in scale and form to create visual interest in the streetscape.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should reflect and reinforce the role and function of streets and spaces.</td>
</tr>
<tr>
<td></td>
<td>Groups or clusters of higher buildings should be of sufficient proximity and height to be distinct and unified in the skyline.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should contribute to local visual interest or legibility, such as at corners.</td>
</tr>
<tr>
<td>4</td>
<td>To provide appropriate continuity and enclosure of streets and spaces.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should enhance the urban design context for public spaces and key thoroughfares.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should provide appropriate levels of enclosure to streets and spaces.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should not produce ‘canyons’ or excessive scale and overbearing of streets or spaces.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should generally be within a human scale, allowing meaningful contact between buildings and the street or space.</td>
</tr>
<tr>
<td></td>
<td>To provide well-connected, high quality and active public spaces.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should be appropriately-scaled to provide appropriate enclosure/exposure to public spaces.</td>
</tr>
<tr>
<td></td>
<td>The negative, micro-climatic effects and cumulative effects on public outdoor space (in particular, of lateral wind and downdraft) due to urban scale and building height, should be avoided or mitigated.</td>
</tr>
<tr>
<td>5</td>
<td>To provide high quality, attractive and useable private spaces.</td>
</tr>
<tr>
<td></td>
<td>Additional urban scale and building height should be appropriately-scaled and distanced to provide appropriate enclosure/exposure, particularly to residential courtyards.</td>
</tr>
<tr>
<td></td>
<td>Reasonable levels of natural light should be received, particularly to the windows of residential units within courtyards.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should not compromise the use of the perimeter block as an important typology that can include courtyards for residential development.</td>
</tr>
<tr>
<td>6</td>
<td>To promote mix of use and diversity of activities.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should contribute to the mix of building and dwelling typologies in the neighbourhood.</td>
</tr>
<tr>
<td>7</td>
<td>To ensure high quality, sustainable buildings.</td>
</tr>
<tr>
<td></td>
<td>‘Monolithic’ or long slab blocks should be avoided.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sunlining (i.e. BRE and BS guidance and standards).</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain.</td>
</tr>
<tr>
<td>---</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should ensure a degree of physical building adaptability.</td>
</tr>
<tr>
<td></td>
<td>Additional building height, at higher density, should maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross-ventilation and for reasons of good street frontage.</td>
</tr>
<tr>
<td>9</td>
<td>Urban scale and building height should contribute positively to views and vistas from housing.</td>
</tr>
<tr>
<td></td>
<td>To secure sustainable density, intensity at locations of high accessibility.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should contribute to sustainable urban density.</td>
</tr>
<tr>
<td></td>
<td>Urban scale and building height should contribute to density and intensity at locations of higher accessibility.</td>
</tr>
</tbody>
</table>
5. **Overall review of urban scale and building height**

This section provides an assessment of the current state of development in the PS area and the potential to review urban scale and building heights in the PS. The assessment is based on the urban design objectives and performance criteria, set out in Section 4 of this report.

As outlined in Section 2 of this review, the development in the area has proceeded in line with the PS, with the commercial floorspace target now exceeded and the residential unit target at almost 85% of target. The development of the area has varied from that shown in the PS as certain elements in the PS are fixed (such as city block building lines and building heights) and others are flexible (such as internal city block building lines and footprints).

Figure 21 below shows the current state of development in the PS area. It includes the new footprints of development that has been completed or is nearing completion. It also includes the original plan from the PS in city blocks where development has not yet commenced (regardless of an existing permission) or where development is at a very early stage.

An overall assessment of the Planning Scheme and its potential for increased urban scale and building heights, against urban design performance criteria is outlined here.
5.1 To ensure a shared vision within a plan-led process.

The urban scale and building height for the PS sits within the statutory context of a city strategy for urban scale and building height (notably policies relating to city structure and urban form and Figure 39 of the DCDP 2016-2022). Vision and strategy for urban scale and building height in the Docklands area have been considered in a comprehensive and detailed fashion over the years of the operation of the Docklands Masterplans and the various SDZs. These processes have been the subject of consultation and public scrutiny, and the elected members. The general approach to urban scale and building height in the Docklands and the PS area is considered to be robust.

5.2 To protect and promote the essential urban context and character/sense of place.

The current PS seeks to respect and complement the surrounding, existing and established urban structure, character, urban scale, and built and natural heritage. Urban scale has been cognisant of existing residential development within the area and nearby, and provision has been made for appropriate transitions in scale. This approach to existing and established character and development should be continued.

Urban scale and building height in the PS reflects the importance of the function of places within the PS area. Urban scale and higher buildings are focused on the designated hubs, which have notable functions, focal spaces and are all highly accessible. The hubs provide a robust urban design concept, which has a very positive impact on place-making in the PS area.

Urban scale and building height in the PS generally tapers down to the boundaries of the area where it borders existing development. Provision is made to taper down building height to existing, lower-scale residential development in certain city blocks. The approach of the PS is robust in this respect and should be continued.

The current standards of urban design, architectural quality and place-making outcomes as set out in the PS will need to be applied to any additional building height. Appropriate conditions around building design and quality will need be applied where increases in building height are recommended.

5.3 To provide high levels of local and wider-area legibility

Urban scale and building height in the PS makes a positive contribution to legibility in the area in a cohesive manner. The current concept for taller landmark buildings provides for clustering of higher buildings at the inner dock of Grand Canal Dock (almost complete) and at and near Station Square in the North Lotts area. The concept provides for two tall ‘distant’ landmark buildings; one at Point Village/Square (The Exo commercial building, comprising 16 storeys, which is currently under construction); the other at the peninsula at Britain Quay (the completed 22 storey, Capital Dock tower building). These buildings effectively exist, in the urban design sense, in isolation from each other.

While the concept for the hubs remains robust, there is potential to locate an additional ‘distant’ landmark of area-wide significance, to provide a ‘gateway’ on the Liffey corridor in partnership with the Capital Dock tower on Britain Quay. This ‘distant’ landmark building should be a tower of slender proportions, set on a base of lower context buildings. It should be located on the opposite, north bank of the Liffey on North Wall Quay. It should provide symmetry with the Capital Dock building and should, therefore, sit on the quay frontage and match its overall height. A significant visual envelope would be defined by these gateway buildings along the Liffey corridor.

The configuration of the urban blocks, spaces and land uses within city block 9 should be reviewed. Any proposal should be supported by detailed daylighting and sunlighiting, and microclimatic analysis. A range of other planning studies, (e.g. telecommunications, aviation, ecology etc.) are also likely to be required.
The option of omitting the tower, and reverting to the general building heights for this city block, should be included in the planning scheme, as this form of development is highly susceptible to market conditions.

Figure 21: Diagram showing the gateway visual concept on the Liffey corridor of proposed tower building at north bank of the Liffey on North Wall Quay in partnership with the Capital Dock tower on Britain Quay.
Figure 22: Three Dimensional view showing the gateway visual concept on the Liffey corridor of proposed tower building at north bank of the Liffey on North Wall Quay in partnership with the Capital Dock tower on Britain Quay.

Urban scale and building height in the PS provides variety in scale, at the level of the individual block frontage. While provision is made to reduce the height of elements of the building frontage, this option has not been availed of as development proposals have consistently presented maximum heights within the permitted ranges. Consequently, block frontages have not been articulated by appreciable changes in building height, for example, at corners/intersections.

There is potential to improve the visual interest in the streetscape and to improve local legibility by allowing for short sections of increased building height in selected locations, such as at junctions and block corners. These should be modest increases in height given the local function, and the need to protect appropriate street proportions, qualities and amenities. Again, proposed increases should be related to location and context building height and will require appropriate sunlighting and daylighting analysis.

Urban scale and building height in the PS reflects and reinforces the role and function of streets and spaces. Building height is closely related to the nature and function of the streets and spaces of the PS (refer also to Figure 31 of the PS). The approach of the PS is robust in this respect and should be continued.

The planned cluster of higher buildings at Grand Canal Inner Dock are of sufficient proximity and height to be distinct and unified in the skyline. A second loose cluster of taller buildings will be developed over time at and near Station Square. Clustering of taller buildings elsewhere in the PS would compromise the wider legibility strategy, which is based on individual tower buildings at hubs (The Exo building and Capital Dock tower). The approach of the PS is robust in this respect and should be maintained.

The PS makes general provision (e.g. coherent and continuous building lines) for strong corners at junctions, however, specific provision is not made for increased building height to improve visual interest or reinforce legibility. There is potential to identify specific locations within the PS where increased height at junctions/corners can make a positive contribution to visual interest and legibility.

5.4 To provide appropriate continuity and enclosure of streets and spaces

Urban scale and building height in the PS enhances the urban design context for public spaces and key thoroughfares. Building heights sit at the maximum of the range in relation to street widths and fixed building lines ensure good continuity of key streets and spaces. The approach of the PS is robust in this respect and should be continued.

Urban scale and building height provisions in the PS provide strong, and in some cases excessive, enclosure to streets and spaces. Analysis for this report shows (Appendix D) that some planned and implemented street proportions are, or could be, in excess of the DMURS recommended proportions (and substantially in excess of best practice guidelines), ranging between 0.6:1 and 0.9:1 (assuming maximum street width and excluding additional set-back floors, where permitted).

It is considered that street proportions for new proposals for development in the PS area should target a ratio of 1:1. This will require a review of street widths where flexible building lines are designated. In any event, the maximum in the range for street widths (as shown in Figure 31 of the PS) should be applied for all street types. In addition, additional floors should not further imbalance the proportions of the street and should have minimal additional impact on daylighting and sunlighting of streets and spaces. This will require additional floor set-backs to sit below an inclined plane of at least 45 degrees from the main building shoulder (the top floor of the building excluding any parapet). This will protect street proportions. Depending on building orientation (for example on
east-west block frontage), this set-back may need to be increased to ensure buildings sit below an inclined plane of 36 degrees, to protect sunlighting and solar gain.

In line with the current provision of the PS, the additional set-back storey should only be considered following satisfactory sunlighting and daylighting analysis to internal courtyards, streets and urban spaces. The current PS provision for a 1.5m set-back for additional floors is considered to have had a detrimental effect on sunlight and daylight, and street proportions and should be set aside.

Urban scale and building height in the PS will need to be monitored so as not to produce ‘canyons’ or excessive scale and overbearing of new streets or spaces. See above comments on street enclosure.

Urban scale and building height in the PS is generally within a human scale and allows meaningful contact between buildings and the street or space, with greater scale along important streets and spaces. Increases in building height above the human scale in the PS are clustered and localised. The approach of the PS is robust in this respect and should be continued.

Urban scale and building height in the PS has generally not compromised the use of perimeter blocks. Where the perimeter block has been undermined, it has been caused by expanding building footprints on flexible building lines, and in some instances the replacement of the perimeter with a single building. Substantially increased building height could undermine the general arrangement of massing in the perimeter, resulting in poorer relationships between building height and internal spaces.

5.5 **To provide well-connected, high quality and active public spaces**

Urban scale and building height in the PS generally enhances and integrates with the public realm. The approach of the PS is robust in this respect and should be continued.

Urban scale and building height in the PS is generally appropriately-scaled, providing appropriate enclosure/exposure to public spaces. The approach of the PS is robust in this respect and should be continued. Any increases in scale should be carefully considered for their impact on enclosure and exposure.

Additional building height could affect levels of sunlight and daylight received to focal/social spaces and could affect their use and their ability to support outdoor activities/street life. Any additional building height to focal/social spaces should be localised and be subject to detailed sunlighting and daylighting studies.

Negative, micro-climatic effects and cumulative effects on public outdoor space (in particular of lateral wind and downdraft) may result from increased building height and the provision of a new ‘gateway’ tower. A detailed study of microclimatic effects of the proposed new Liffey ‘gateway’ tower should be required and it should include any necessary measures to avoid or mitigate negative micro-climatic effects.

5.6 **To provide high quality, attractive and useable private spaces**

Additional urban scale and building height could compromise the quality of private outdoor space. Any additional building height to private spaces should be localised, and set-back as appropriate. It should also be the subject of detailed sunlighting and daylighting study.

Additional urban scale and building height could affect the appropriate enclosure/exposure of residential courtyards. See comment above.

Adequate sunlight and daylight should be received throughout the year to communal private spaces, particularly to courtyards, to allow for play and other activities. Detailed sunlighting and daylighting
studies should be required to ensure that adequate sunlight and daylight is received throughout the year in residential courtyards and, in particular, play areas.

Reasonable levels of natural light should be received, particularly to the windows of residential units within courtyards. This should be the subject of detailed sunlighting and daylighting studies at development proposals stage.

Negative micro-climatic effects and cumulative effects (in particular, of wind and downdraft) should be avoided or mitigated. Where increased height is proposed designers should be required to have regard to microclimatic issues and to include design measures to mitigate these.

Urban scale and building height should not compromise the use of the perimeter block as an important typology for residential development. The PS currently allows for the completion of perimeter blocks to accommodate residential development. The general approach of the PS is robust in this respect and should be continued.

Reasonable levels of overlooking and privacy should be retained in residential and mixed use development. The general approach of the PS is robust in this respect and should be continued.

5.7 To promote mix of use and diversity of activities

Urban scale and building height in the PS should not compromise the delivery of mixed use, such as housing, commercial and employment development. The general approach of the PS is robust in this respect and should be continued.

Urban scale and building height in the PS should contribute to the building and dwelling typologies in the neighbourhood. The general approach of the PS is robust in this respect and should be continued.

Urban scale and building height should contribute to well-designed, high quality development. The general approach of the PS is robust in this respect and should be continued.

‘Monolithic’ or long slab blocks should be avoided. The general approach of the PS provides for a relatively fine grain of urban blocks. This review proposes to articulate building height at corners and junctions and this should assist in addressing address issues of monotony in frontage.

Urban scale and building height should be carefully modulated and orientated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. The general approach of the PS is robust in this respect and should be continued. Increases in building height should be localised, modulated and appropriately set-back.

Urban scale and building height should have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sunlighting (i.e. BRE and BS guidance and standards). Detailed studies will be required for increases in building height. Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or wider planning objectives, such as comprehensive urban regeneration, and effective urban design and streetscape solutions.

Urban scale and building height should not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain. When considering additional building height sunlighting studies shall consider the impact on the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain.

Urban scale and building height should ensure a degree of physical building adaptability. When considering additional building height, proposals should show how a degree of building adaptability will be retained.
Additional building height, at higher density, should maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross-ventilation and for reasons of good street frontage. Where increased building height is proposed, it may be necessary to increase the proportion of dual aspect units, to address passive solar gain, achieve cross-ventilation and for reasons of good street frontage.

Urban scale and building height should contribute positively to views and vistas from housing. Additional building height should not detract from reasonable access to views and vistas from housing.

5.8 To secure sustainable density, intensity at locations of high accessibility

Urban scale and building height should contribute to sustainable urban density. The general approach of the PS is robust in this respect and should be continued.

Urban scale and building height should contribute to density and intensity at of locations of higher accessibility. The general approach of the PS is robust in this respect and should be continued.

5.9 Detailed recommendations

Detailed recommendations for changes in building heights are contained in the following section. These are described by city block. A preliminary revised shadow analysis, based on that carried out for the 2014 Planning Scheme is included in Appendix E.
6. Recommendations for revisions building height controls
Revisions are recommended to the building height controls of city blocks 2, 3, 7, 9, 11, 18 and 19. The revisions are informed by the overall review of urban scale and building height in section 5. The changes proposed in Figure 23 (below) and the recommended changes are described by city block.

Figure 23: Proposed revisions of building height controls
CITY BLOCK 2
General  Planning Scheme (s.5.5.2). Located in the North Lotts area, this city block comprises four perimeter blocks (2A-2D), and includes an existing two-storey, residential terrace. Existing, adjacent development fronts onto this city block at Park Lane, Sheriff Street Upper and New Wapping Street. A 40% residential to 60% commercial land use mix is specified for this city block.

Existing building height controls (PS 2014)  Block 2A - 6 commercial or 7 residential storeys.
Block 2B - 6 commercial or 7 residential storeys.
Block 2C - Part Landmark Building to Station Square (10 storeys minimum and 12 storeys maximum commercial), part 6 commercial or 7 residential storeys, with 8 commercial or 10 residential storeys element at north-east corner.
Block 2A - Part 6 commercial or 7 residential storeys, and part 5 commercial and 6 residential storeys (north and east perimeters). Stepping down to 3 residential storeys immediately north and west of the existing terrace of two-storey buildings on Mayor Street.

General clauses in PS also apply.

Proposed building height controls  Block 2A
Part 6 commercial or 7 residential storeys, and part 8 commercial or 10 residential storeys to Sherriff Street Upper frontage.

Rationale:
The block building line is set-back from the Sheriff Street, and this can accommodate some increase in building height within reasonable scale, proportions and quality parameters;
Reflects a similar scale of building to parts of existing, adjacent opposite street frontages.

Block 2B
Part 6 commercial or 7 residential storeys, and part 8 storey commercial or 10 storey residential to Sheriff Street Upper frontage corners only Provides greater variety and articulation of building height and along the Sheriff Street Upper frontage.

Rationale:
Provides local landmark feature at the corner/intersection of Sherriff Street Upper and East Wall Road;
Reflects a similar scale of development to the corner/intersection of Sheriff Street Upper and East Wall Road;
Responds to lower sensitivity commercial use and sub-station to part of opposite street frontage at Sheriff Street Upper;
Potential to take a common approach to height at the intersection in scaling of the corner in City Block 3, Block 3A;
Provides greater variety and articulation of building height and along the Sheriff Street Upper frontage.

Block 2C
Part Landmark Building to Station Square (10-storey minimum and 12-storey maximum commercial), part 6 commercial or 7 residential storeys, and 8 commercial or 10 residential storeys on the western frontage.
Rationale:
Reflects similar scale of existing development to opposite, Park Lane frontage;
Scale, proportions and quality of internal, east-west street maintained.
Block 2D
Part 6 commercial or 7 residential storeys, and part 5 commercial and 6 residential storeys (part of north side and full east side of perimeter) block. Stepping down to 3 residential immediately north and west of existing terrace of two storey buildings on Mayor Street.

Rationale:
Scale, proportions and quality of internal, east-west street maintained; Maintains the essential height and scale relationship with existing residential development on Mayor Street and New Wapping Street.

Conditions
Careful design of public space between Block 2A and Sheriff Street viaduct is required, with potential for raised ground floor levels to improve the interface with the viaduct.

CITY BLOCK 3
General
Planning Scheme (s.5.5.3). Located in the North Lotts area, this city block comprises six, urban perimeter blocks (3A-3F), and a central urban space. Block D part consists of existing, two and three storey residential development fronting New Wapping Street and Mayor Street Upper, and Block C was completed under the previous Planning Scheme. Existing, adjacent development fronts onto this city block at Castleforbes Road, and development is nearing completion on the opposite side of Mayor Street Upper. A 70% residential to 30% commercial land use mix is specified for this city block.
Existing building height controls (PS 2014)

Blocks 3A and 3B - 6 commercial or 7 residential storeys.
Block 3D – completion of block at 5 commercial and 6 residential storeys (stepping down to 3-storey residential immediately east of the terrace on Mayor Street Upper and to the rear of the northern end of the terrace on New Wapping Street).
Block 3E and 3F - 6 commercial or 7 residential storeys to main frontages to Mayor Street Upper and Castleforbes Road and 5 commercial and 6 residential storeys to inner streets and spaces.

General clauses in PS also apply.

Proposed building height controls

**Block 3A**
8 commercial or 10 residential storeys to corner of Sherriff Street Upper and New Wapping Street (should not extend more than one third of the length of the block frontages).

Rationale:
Provides a coherent approach to height at the intersection in scaling of the corner in City Block 2, Block 2B.

**Block 3B**
8 commercial or 10 residential storeys to north-west block corner of Sherriff Street Upper (should not extend more than one third of the length of the block frontages).

Rationale:
Provides local landmark feature at the corner/intersection of Sherriff Street Upper and the new local street along the block;
Provides greater variety and articulation of building height along the Sheriff Street Upper frontage.

**Block 3C**
No change.

Rationale:
Protection of existing residential amenity within the block;
Maintains appropriate scale, proportions and quality of internal, east-west streets and the central urban space, having particular regard to the residential component of the use mix.

**Block 3D**
No change.

Rationale:
Maintains appropriate scale, proportions and quality of internal, east-west streets and the central urban space, having particular regard to the residential component of the use mix.

**Block 3F**
Inclusion of 8 commercial or 10 residential storeys at north-west corner of the block (should not extend more than one third of the length of the block frontage), and to rear of frontage to Castleforbes Road and Mayor Street Upper.

Rationale:
Provides local landmark feature at the corner of the urban space;
Provides variety and articulation of a corner of the urban space, allows for increased height within block while protecting the amenity and proportions of surround streets and spaces.

**Conditions**

To be considered at development management stage.
### CITY BLOCK 7

<table>
<thead>
<tr>
<th>General</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning Scheme (s.5.5.7). Located in the North Lotts area, this city block comprises four, urban perimeter blocks (7A-7D), and an urban space (Station Square). Block C includes the former North Wall Road Station and the former Woolstore – both lower scale protected structures. Block D includes the London and North Western Hotel, a lower scale protected structure. Blocks B and D are currently under construction.</td>
<td>Existing, adjacent development fronts onto this city block at Park Lane, New Wapping Street and Mayor Street Upper. A 30% residential to 70% commercial land use mix is specified for this city block.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Existing building height controls (PS 2014)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Block 7A is an existing/planned urban space.</td>
<td>Block 7B - 6 commercial or 7 residential storeys.</td>
</tr>
<tr>
<td>Block 7B - 6 commercial or 7 residential storeys</td>
<td>Block 7C – 6 commercial or 7 residential storeys</td>
</tr>
<tr>
<td>Block 7C – 6 commercial or 7 residential storeys</td>
<td>Block 7D – 8 storey commercial or 10 storey to North Wall Quay and 6 commercial or 7 residential storeys to other frontages.</td>
</tr>
<tr>
<td>General clauses in PS also apply.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Proposed building height controls</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Block 7A</td>
<td>N/A</td>
</tr>
<tr>
<td>Rationale:</td>
<td>N/A</td>
</tr>
</tbody>
</table>

| Block 7B                                                                |                                                                 |
| Inclusion of 8 storey commercial or 10 storey section set back from Mayor Street Upper frontage. The additional storeys must sit below a 35 to 45 degree inclined plane from the main parapets fronting all streets and spaces (6 storey commercial or 7 storey residential). | Rationale: Maintains the proposed scale, proportions, quality and amenity of Mayor Street Upper and Station Square; Maintains an appropriate scale relationship and amenity with established residential development fronting the opposite side of Mayor Street Upper |

| Block 7C                                                                |                                                                 |
| Inclusion of 8 storey commercial or 10 storey section to west frontage of the block – (up to 40% of the total frontage, located at middle section of the frontage). | Rationale: Provides greater variety and articulation of building height on this frontage; Retains essential scale relationship with protected structures; Retains amenity and scale relationship and amenity of Station Square. |

| Block 7D                                                                |                                                                 |
| Extension of 8 storey commercial or 10 storey residential element to north of block, including a corner on the north-western corner of the block. Provision for additional floors to maximum of 10 commercial floors (including any set-back floor) to the corner of North Wall Quay and New Wapping Street. These additional floors should not exceed 20 metres in overall frontage length to North Wall Quay and 30 metres overall frontage to New Wapping Street. |
Rationale:
Provides local landmark feature at the corner/intersection of North Wall Quay and New Wapping Street;
Maintains appropriate scale, proportions, quality and amenity of internal, east-west streets and Station Square;
Provides greater variety and articulation of building height to Station Square, while protecting the amenity of the space;
The additional floors to North Wall Quay will provide a local landmark, adding additional variety in building height. It will mark the location of the landing of the revised pedestrian bridge, linking the North Lotts and Grand Canal Docks;
The limit in frontage length will reduce impacts on the street and space proportions, daylight and sunlight.

**Conditions**
To be considered at development management stage.
**CITY BLOCK 9**

**General**
Planning Scheme (s.5.5.9). Located in the North Lotts area, this city block comprises four, urban perimeter blocks (9A-9D), and a small focal urban space.

Adjacent development at Castleforbes Road (Block 8) is nearing completion. Development on the opposite frontage of Mayor Street Upper was completed under the previous PS. Development on the opposite, eastern frontage of North Wall Avenue is underway. A 50% residential to 50% commercial land use mix is specified for this city block.

**Existing building height controls (PS 2014)**
Block A - 6 commercial or 7 residential storeys to Castleforbes Road and Mayor Street, with 5 commercial and 6 residential storeys to all internal streets and spaces.
Block B - 6 commercial or 7 residential storeys to Mayor Street and North Wall Avenue, with 5 commercial and 6 residential storeys to all internal streets and spaces.
Block C - 8 storey commercial or 10 storey residential to North Wall Quay frontage, 6 commercial or 7 residential storeys to Castleforbes Road frontage, with 5 commercial and 6 residential storeys to all internal streets and spaces.
Block D - 8 storey commercial or 10 storey residential to North Wall Quay frontage, 6 commercial or 7 residential storeys to North Wall Avenue, with 5 commercial and 6 residential storeys to all internal streets and spaces.

General clauses in PS also apply.

**Proposed building height controls**

**Block 9A**
No change

Rationale:
Maintains the proposed scale, proportions, quality and amenity of the mixed use internal streets and spaces and the mixed use internal private spaces.
Maintains the proposed scale relationship and amenity with established residential development fronting the opposite side of the main frontage.

**Block 9B**
Addition of 8 storey commercial or 10 storey residential to corner of North Wall Avenue and Mayor Street Upper (to extend to no more than 30% of frontage to Mayor Street Upper and 25% of frontage along North Wall Avenue).

Rationale:
Provides a local landmark to frame The Point Square, in symmetry with opposite corner building (Mayor Street Upper).

**Block 9C**
No change

Rationale:
Maintains the proposed scale, proportions, quality and amenity of the mixed use internal streets and spaces and the mixed use internal private spaces.
Maintains the proposed scale relationship and amenity with established residential development fronting the opposite side of the main frontage.

**Block 9D**
Inclusion of landmark building on the south-eastern corner of the block (corner of North Wall Quay and North Wall Avenue).
Building height within range 22-25 storeys (residential use). Slender proportion, with no external horizontal dimension above the general context building heights of the block to exceed 25m.
No change to existing building height controls elsewhere in the block.

Rationale:
Provides area and city-wide landmark building to act, in tandem with existing Capital Dock tower in City Block 15, as a new river/city gateway;
Maintains appropriately scaled and contrasting base of buildings, from which the tower projects skywards;
Matches tower scale and provides visual symmetry for the gateway;
Slender proportions protect the amenity of mixed use public streets and spaces and private spaces in the city block and surrounding city blocks as shown in Figure 23 (This is particularly important given the location of the tower in the southern frontage of the city block).

Conditions
The proposed tower should comply with the provisions of the PS, notably s.1.2.9 and s.4.10.6, and objectives relating to EIAR and AA. Others to be considered at development management stage.
### CITY BLOCK 11

#### General
Planning Scheme (s.5.5.11). Located in the Grand Canal Docks area, this city block is largely developed. The planning scheme designates 5 blocks (11A-11E). Development of blocks 11D and 11E are nearing completion. Much of the adjacent development fronting Lime Street and Hanover Street East is lower scale and established. Development on the opposite, eastern frontage of Cardiff Lane was completed under the previous Grand Canal Dock planning scheme. A 50% residential to 50% commercial land use mix is specified for this city block in recognition of the interface with established residential communities in this area.

#### Existing building height controls (PS 2014)
<table>
<thead>
<tr>
<th>Block</th>
<th>Height Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td>Block 11A</td>
<td>8 storey commercial or 10 storey residential to City Quay frontage, beside retained protected structure (former British and Irish Steam Packet Ltd Building).</td>
</tr>
<tr>
<td>Block 11B</td>
<td>5 commercial and 6 residential storeys.</td>
</tr>
<tr>
<td>Block 11C</td>
<td>5 commercial and 6 residential storeys.</td>
</tr>
<tr>
<td>Block 11D</td>
<td>5 commercial and 6 residential storeys.</td>
</tr>
<tr>
<td>Block 11E</td>
<td>5 commercial and 6 residential storeys, and 6 commercial or 7 residential storeys to Cardiff Lane frontage.</td>
</tr>
</tbody>
</table>

General clauses in PS also apply.

#### Proposed building height controls

<table>
<thead>
<tr>
<th>Block</th>
<th>Height Controls</th>
</tr>
</thead>
<tbody>
<tr>
<td>Block 11A</td>
<td>No change</td>
</tr>
<tr>
<td>Rationale:</td>
<td>Maintains the proposed scale relationship with the protected structure.</td>
</tr>
<tr>
<td></td>
<td>Maintains the proposed scale, proportions, quality and amenity of the mixed use internal streets and spaces and the mixed use internal private spaces.</td>
</tr>
<tr>
<td></td>
<td>Maintains the proposed scale relationship with established adjacent development.</td>
</tr>
<tr>
<td></td>
<td>Maintains the proposed scale relationship and amenity of the Campshire.</td>
</tr>
</tbody>
</table>

| Block 11B   | No change.                                                                       |
| Rationale:  | Maintains the proposed scale, proportions, quality and amenity of the mixed use internal streets and spaces and the mixed use internal private spaces. |

| Block 11C   | No change.                                                                       |
| Rationale:  | Maintains the proposed scale, proportions, quality and amenity of the mixed use internal streets and spaces and the mixed use internal private spaces; |
|             | Maintains the proposed scale relationship and amenity with established development fronting the opposite sides of the street. |

| Block 11D   | No change.                                                                       |
| Rationale:  | Maintains the proposed scale, proportions, quality and amenity of the mixed use internal streets and spaces and the mixed use internal private spaces. |
Maintains the proposed scale relationship and amenity with established development fronting the opposite side of the main frontages.

**Block 11E**
No change.

**Rationale:**
This block is nearing completion.

**Conditions**
To be considered at development management stage.

**CITY BLOCK 18**

**General**
Planning Scheme (s.5.5.18). Located in the Grand Canal Docks area, this large city block comprises two, infill urban perimeter blocks (18A and B), and a small focal urban space fronting the dock. These blocks are currently the Ringsend Road Bus Depot for Dublin Bus. A 60% residential to 40% commercial land use mix is specified for this city block.

**Existing building height controls (PS 2014)**
Block 18A - 6 commercial or 7 residential storeys to Ringsend Road and Dock frontages, with 5 commercial and 6 residential storeys to the new north-south street;
Block 18B - 6 commercial or 7 residential storeys to Ringsend Road and Dock frontages, with 5 commercial and 6 residential storeys to the new north-south streets.

General clauses in PS also apply.
Proposed building height controls

**Block 18A**
Introduce higher corner section of 8 storey commercial or 10 storey residential to Dock frontage. These additional floors should extend to no more than 30% of both frontages.

Rationale:
Provides local landmark feature at the corner/intersection of the local open space and the new local street;
Provides greater variety and articulation of building height on this frontage;
Retains essential scale relationship between blocks and adjoining development;
Retains amenity and scale relationship and amenity of small dock focal space.

**Block 18B**
Introduce higher corner section of 8 storey commercial or 10 storey residential to Dock frontage. These additional floors should extend to no more than 30% of the dock frontage.

Rationale:
Provides local landmark feature at the corner/intersection of the local open space and the new local street;
Provides greater variety and articulation of building height on this frontage;
Retains essential scale relationship between blocks and adjoining development;
Retains amenity and scale relationship and amenity of small dock focal space.

**Conditions**
To be considered at development management stage.

---

**Existing height**

![Existing height diagram]

**Proposed amendments to height**

![Proposed height diagram]
CITY BLOCK 19

**General**

Planning Scheme (s.5.5.19). Located in the Grand Canal Docks area, this large city block comprises two blocks (19A and B), and a small focal urban space fronting the dock. This is the location of the former graving docks. The overall use mix is 40 residential/30 commercial/30 community and recreational or cultural. The residential component to be provided in Block B.

**Existing building height controls (PS 2014)**

Block 19A - 5 commercial and 6 residential storeys.
Block 19B - 6 commercial or 7 residential storeys.

General clauses in PS also apply.

**Proposed building height controls**

**Block 19A**

Provision made to permit a lower scale building of not less than 3 storeys or equivalent.
Minor amendment to the block plan.

Rationale:
Provides greater flexibility for the provision of cultural and community structures.
Plan change accommodates the potential to better incorporate former dock structures.

**Block 19B**

Introduce higher corner section of 8 storey commercial or 10 storey residential to the dock frontage. These additional floors should extend to no more than 25% of the overall block frontage.
Minor amendment to the block plan proposed.

Rationale:
Provides greater variety and articulation of building height on this frontage; The block plan change provides better potential to incorporate former dock structures; Provides local landmark feature at the corner/intersection of S Dock Road, west of the urban block and the new local street linking the S Dock Road, east of the urban block.

**Conditions**

To be considered at development management stage.
Existing height

Proposed amendments to height

- LANDMARK BUILDINGS
- 6 STOREY COMMERCIAL / 7 STOREY RESIDENTIAL
- 5 STOREY COMMERCIAL / 6 STOREY RESIDENTIAL
- LOCAL LANDMARK BUILDING

- CITY BLOCK/BOUNDARY LINE
- FLEXIBLE BUILDING LINE
- CIVIC / PUBLIC SPACES
- INDICATIVE FINE URBAN GRANULAR
References


DEHLG (2007c) *Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities*. Dublin: Government of Ireland.


DDDA (Dublin Docklands Development Authority) (2002) *Docklands North Lotts Planning Scheme*. Dublin: DDDA

J439 www.loci.ie


Dublin City Council (2011) *Dublin City Development Plan 2011-2017*.

Dublin City Council (2014a) *North Lotts and Grand Canal Dock Planning Scheme*.

Dublin City Council (2014b) *Draft Public Realm Masterplan for the North Lotts and Grand Canal Docks SDZ Planning Scheme*.

Dublin City Council (2016) *Dublin City Development Plan, 2016-2022*.


Appendix A

Table A1. Appropriate criteria contained in the *Urban Development and Building Heights: Guidelines for Planning Authorities* (DHPLG, 2018b) for this building height review of the Planning Scheme.

<table>
<thead>
<tr>
<th>Criterion and category</th>
<th>Relevance to Docklands PS review</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scale of the relevant city/town</strong></td>
<td></td>
</tr>
<tr>
<td>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td>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.</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td><strong>At the scale of district/ neighbourhood/ street</strong></td>
<td></td>
</tr>
<tr>
<td>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td>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).</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td>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.</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td><strong>At the scale of the site/building.</strong></td>
<td></td>
</tr>
<tr>
<td>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</td>
<td>Relevant to the study</td>
</tr>
<tr>
<td>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’.</td>
<td>Relevant to the study in a more general sense and at the masterplanning scale.</td>
</tr>
<tr>
<td>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply</td>
<td>Relevant to the study in a more general sense and application.</td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>Specific Assessments</th>
<th>Relevant to the study in a more general sense and application.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specific impact assessment of the micro-climatic effects such as downdraft. 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.</td>
<td>Relevant to the study in a more general sense and application.</td>
</tr>
<tr>
<td>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.</td>
<td>Relevant to the study in a more general sense and application.</td>
</tr>
<tr>
<td>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</td>
<td>Relevant to the study in a more general sense and application.</td>
</tr>
<tr>
<td>An assessment that the proposal maintains safe air navigation</td>
<td>Relevant to the study in a more general sense and application.</td>
</tr>
<tr>
<td>An urban design statement including, as appropriate, impact on the historic built environment.</td>
<td>Relevant to the study in certain locations.</td>
</tr>
<tr>
<td>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</td>
<td>Separate processes, into which this study may contribute.</td>
</tr>
</tbody>
</table>
Appendix B
Table B1. Criteria and indicators of the *Urban Design Manual* (DEHLG, 2009b) of particular relevance to this building height review of the Planning Scheme.

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>01 Context</strong></td>
<td>How does the development respond to its surroundings?</td>
</tr>
</tbody>
</table>
|                    | • The development seems to have evolved naturally as part of its surroundings  
• Appropriate increases in density respect the form of buildings and landscape around the site’s edges and the amenity enjoyed by neighbouring users  
• Form, architecture and landscaping have been informed by the development’s place and time  
• The development positively contributes to the character and identity of the neighbourhood  
• Appropriate responses are made to the nature of specific boundary conditions |
| **02 Connections** | How well connected is the development?                                                                                                                                                                    |
|                    | • The development is located in or close to a mixed-use centre  
• Appropriate density, dependent on location, helps support efficient public transport                                                                                                                  |
| **03 Inclusivity** | How easily can people use and access the development?                                                                                                                                                     |
|                    | General relevance - notably importance of quality of public and private spaces.                                                                                                                             |
| **04 Variety**     | How does the development promote a good mix of activities?                                                                                                                                                 |
|                    | General relevance – notably importance of mixed use in contributing to quality of life.                                                                                                                      |
| **05 Efficiency**  | How does the development make appropriate use of resources, including land?                                                                                                                                  |
|                    | • The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design  
• Buildings, gardens and public spaces are laid out to exploit the best solar orientation                                                                                                             |
| **06 Distinctiveness** | How do the proposals create a sense of place?                                                                                                                                                              |
|                    | • The place has recognisable features so that people can describe where they live and form an emotional attachment to the place  
• The scheme is a positive addition to the identity of the locality  
• The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout  
• The proposal successfully exploits views into and out of the site  
• There is a discernible (sic) focal point to the scheme, or the proposals reinforce the role of an existing centre |
| **07 Layout**      | How does the proposal create people friendly streets and spaces?                                                                                                                                              |
|                    | Importance of good route structure and active street frontages and interfaces.  
• Block layout places some public spaces in front of building lines as squares or greens, and some semi private space to the back as communal courts                                                                 |
| **08 Public Realm**| How safe, secure and enjoyable are the public areas?                                                                                                                                                        |
|                    | Of general relevance, notably clear distinction between public and private space with passive supervision.  
• The public realm is considered as a usable integrated element in the design of the development                                                                                                          |
| **09 Adaptability**| How will the buildings cope with change?                                                                                                                                                                    |
|                    | • Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation  
• The homes are energy-efficient and equipped for challenges anticipated from a changing climate                                                                                                 |
| **10 Privacy and Amenity** | Of general relevance.                                                                                                                                  |
| How does the scheme provide a decent standard of amenity? | • The design maximises the number of homes enjoying dual aspect.  
• Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units. |
|---|---|
| **11 Parking**  
How will the parking be secure and attractive? | Of general relevance. |
| **12 Detailed Design**  
How well thought through is the building and landscape design? | Of general relevance. |
Table C1. Urban design performance criteria for urban scale and building height and references

<table>
<thead>
<tr>
<th>Urban design objectives</th>
<th>Performance criteria</th>
<th>Main references</th>
</tr>
</thead>
<tbody>
<tr>
<td>To ensure a shared vision within a plan-led process.</td>
<td>Urban scale and building height and should be considered as part of a larger area-based, vision or building heights and skyline strategy, involving public consultation in a statutory plan process.</td>
<td>DEHLG, 2009a; DCC, 2014a; DCC, 2016;</td>
</tr>
<tr>
<td>To protect and promote the essential urban context and character/sense of place.</td>
<td>Urban scale and building height should respect and/or complement existing and established surrounding urban structure, character, urban scale and built and natural heritage. Urban scale and building height should reflect the importance of the function of places. It should be located in central locations, such as highly accessible focal spaces and places of greater activity and land use intensity. Additional urban scale and building height should generally taper down to boundaries of a site in an established area. In proposing additional urban scale and building height the highest standards of urban design, architectural quality and place-making outcomes should be achieved.</td>
<td>English Partnerships, 2000; DETR, 2000; DEHLG, 2009b; DCC, 2014a; DCC, 2016; DHPLG, 2018b;</td>
</tr>
<tr>
<td>To provide high levels of local and wider area legibility.</td>
<td>Urban scale and building height should make a positive contribution to legibility in an area in a cohesive manner. Urban scale and building height should provide variety in scale and form to create visual interest in the streetscape. Urban scale and building height should reflect and reinforce the role and function of streets and spaces. Groups or clusters of higher buildings should be of sufficient proximity and height to be distinct and unified in the skyline. Urban scale and building height should contribute to local visual interest or legibility such as at corners.</td>
<td>English Partnerships, 2000; DETR, 2000; DCC DTTS &amp; DECLG, 2013; DCC, 2014a; DHPLG, 2018b;</td>
</tr>
<tr>
<td>To provide appropriate continuity and enclosure of streets and spaces</td>
<td>Urban scale and building height should enhance the urban design context for public spaces and key thoroughfares. Urban scale and building height should provide appropriate levels of enclosure to streets and spaces. Urban scale and building height should not produce ‘canyons’ or excessive scale and overbearing of streets or spaces. Urban scale and building height should be generally within a human scale, allowing meaningful contact between buildings and the street or space. Urban scale and building height should not compromise the use of perimeter blocks.</td>
<td>DETR, 2000; English Partnerships, 2000; Gehl, 2001; DEHLG, 2009b; DTTS &amp; DECLG, 2013; DCC, 2014a; DHPLG, 2018b;</td>
</tr>
<tr>
<td>To provide well-connected, high quality and active public spaces.</td>
<td>Urban scale and building height should integrate into, and enhance, the public realm. Urban scale and building height should be appropriately-scaled to provide appropriate enclosure/exposure to public spaces. Adequate sunlight and daylight should be received to focal/social spaces to ensure they are useable and can support outdoor activities. The negative, micro-climatic effects and cumulative effects on public outdoor space (in particular, of</td>
<td>English Partnerships, 2000; DETR, 2000; Gehl, 2001; English Partnerships, 2007; DEHLG, 2007c; DEHLG, 2009b; DHPLG, 2018b;</td>
</tr>
</tbody>
</table>
lateral wind and downdraft) due to urban scale and building height, should be avoided or mitigated.

To provide high quality, attractive and useable private spaces.

| Urban scale and building height should not compromise high quality private outdoor space. | English Partnerships, 2000; English Partnerships, 2007; DEHLG, 2007c; DEHLG, 2009b; DHPLG, 2018b; DHPLG, 2018c; |
| Additional urban scale and building height should be appropriately-scaled and distanced to provide appropriate enclosure/exposure, particularly to residential courtyards. |
| Adequate sunlight and daylight should be received throughout the year to communal private spaces, particularly to courtyards, to allow for play and other activities. |
| Reasonable levels of natural light should be received, particularly to the windows of residential units within courtyards. |
| Negative micro-climatic effects and cumulative effects (in particular, of wind and downdraft) should be avoided or mitigated. |
| Urban scale and building height should not compromise the use of the perimeter block as an important typology for residential development. |
| Reasonable levels of overlooking and privacy should be retained in residential and mixed use development. |

To promote mix of use and diversity of activities.

| Urban scale and building height should not compromise the delivery of mixed use, such as housing, commercial and employment development. |
| Urban scale and building height should contribute to the building and dwelling typologies in the neighbourhood. |
| Urban scale and building height should contribute to well-designed high quality development. |

To ensure high quality, sustainable buildings

| ‘Monolithic’ or long slab blocks should be avoided. |
| Urban scale and building height should be carefully modulated and orientated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. |
| Urban scale and building height should have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sunlighting (i.e. BRE and BS guidance and standards). |
| Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or wider planning objectives, such as comprehensive urban regeneration, and effective urban design and streetscape solutions. |
| Urban scale and building height should not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain. |
| Urban scale and building height should ensure a degree of physical building adaptability. |
| Additional building height, at higher density, should maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross-ventilation and for reasons of good street frontage. |
| Urban scale and building height should contribute positively to views and vistas from housing. |

To secure sustainable density.

| Urban scale and building height should contribute to sustainable urban density. |
| English Partnerships, 2000; English Partnerships, 2007; DEHLG, 2007c; DEHLG, 2009b; |
| intensity at locations of high accessibility. | Urban scale and building height should contribute to density and intensity at of locations of higher accessibility. | DCC, 2014a; DHPLG, 2018b; |
### Appendix D
Table D1, Typical and revised street proportions (based on Figure 31 of the PS).

<table>
<thead>
<tr>
<th>Street type</th>
<th>Width range</th>
<th>Building Height – typical</th>
<th>Street enclosure – typical using maxima</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main Street (Mayor Street and Sheriff Street)</td>
<td>22-24m</td>
<td>6/7 storeys – commercial/residential 25m/23m to parapet. In the case of Block 8, the top floor setback are minimal adding to effective street frontage building height.</td>
<td>0.9 to 1.0:1.0. In excess of DMURS street proportions</td>
</tr>
<tr>
<td>City Street (generally north-south)</td>
<td>18-22m</td>
<td>6/7 storeys – commercial/residential 25m/23m to parapet</td>
<td>0.9:1 In excess of DMURS street proportions</td>
</tr>
<tr>
<td>Local Streets Typically north-south in North Lotts area)</td>
<td>14-18m</td>
<td>6/7 storeys – commercial/residential 25m/23m to parapet</td>
<td>0.7:1.0 In excess of DMURS street proportions.</td>
</tr>
<tr>
<td>Laneway (Typically east-west in North Lotts area)</td>
<td>10-14m</td>
<td>6/7 storeys – commercial/residential 25m/23m to parapet, and 5/6 storeys – commercial/residential 21m/20m to parapet,</td>
<td>0.6:1.0 In excess of DMURS street proportions.</td>
</tr>
</tbody>
</table>
Appendix E (Shadow Analysis)
This analysis is an update of the analysis carried out for the Planning Scheme (PS) in 2014. As such, this study deploys the same basic methodology. The review includes:

- An updated shadow analysis for the PS, as currently built;
- A shadow analysis for the changes proposed in this review; and
- A comparison of the analysis of the PS 2014, as currently built, and the proposed changes.

At this masterplanning stage, analysis of sunlighting and daylighting is basic and preliminary in nature. This is because:

- The PS includes outline block volumes, based on height controls, within which buildings can be considered, rather than specific building volumes;
- Final building form, layout and orientation (including building footprints, private spaces, internal layouts, land use mix, elevations and windows etc.) is not known and cannot be accurately anticipated at this planning stage; and
- The PS covers a large area.

Detailed sunlighting and daylighting studies are required for individual proposals at the development management stage, in line with the PS and the relevant planning guidelines (notably, DHPLG, 2018b). At development management stage a full and detailed quantitative and qualitative analysis should be presented in line with guidelines such as Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BRE, 2011) and/or BS 8206-2:2008: Lighting for buildings. Code of practice for daylighting (British Standards, 2008).

In this assessment, the current PS was used as a benchmark. At the time of its preparation the daylight and sunlight conditions indicated by the shadow analysis and the indicative sections were considered broadly acceptable, subject to provisions in the PS for further analysis at the development management stage. It should be noted that the approved PS included revisions by An Bord Pleanala to increase building heights on some frontages, while retaining the proposed block size and configuration. Assuming building to maximum permitted heights, this would have reduced access to sunlight and daylight at certain locations. The shadow analysis was updated for the PS at this time to reflect these changes.

Daylighting
The PS does not contain adequate detail around building layout and design to allow an accurate or useful assessment of daylighting. In general terms, the perimeter, urban block layout and massing proposed in the PS and the proposed revisions provide scope for adequate daylighting. At this stage appropriate measurements, such as vertical sky component (VSC) should be deployed. At development management stage, it will be important to consider the need for daylight not just to residential and mixed use buildings, but also to commercial buildings.

Sunlighting
The assessment for sunlighting is based on shadow studies of the PS area. The assessment included shadow studies for:

- The Equinox (March 21st is chosen) at 0900, 1200 and 1500hrs;
- The Summer solstice (June 21st) at 0900, 1200 and 1500hrs; and
- The Winter solstice (December 21st at 0900, 1200 and 1500hrs.

In line with the PS 2014, and accepted practice, the average condition is taken as the equinox, and the assessment is based around this. The effect of shadow on the equinox on the main urban spaces, main streets and private spaces (internal courtyards) is described. For these spaces, most (and ideally 60%) of their area should have access to some sunlight on 21st March. BRE (2011) recommends that garden or amenity areas should appear adequately sunlit throughout the year, and that at least half of their area should receive at least two hours of sunlight on the 21st of March. The maximum sun elevation on the equinox in Dublin occurs around midday and is 36 degrees, and the effect of this on the a typical east-west, street section of 1:1 proportions is shown in Figure E1.

Urban spaces
The shadow analysis shows that the main urban spaces, which remain to be completed, could receive reasonable levels of sunlight in the existing PS, subject to careful consideration of development proposals. Access to sunlight in the main urban spaces is distributed throughout the day, and is generally greatest at maximum sun elevation (midday).

The analysis shows that the proposed revisions have a minimal effect on the existing shadow condition. Small areas of additional shadow to the main urban spaces are cast by localised increases in height in sections of
The additional shadow of the gateway tower on north wall quay will fall largely within the city block and surrounding streets and blocks.

**Streets**

The shadow impact on streets is dependent largely on orientation. Most streets and spaces in the PS area are orientated either east-west or north-south. North-south streets will benefit from some level of sunlighting to the surface during the day (around midday), and additional sunlighting depends on the scale of frontage buildings and street width. The proposed revisions do not substantially alter these conditions.

East-west streets provide access to daylighting to the north-side of the streets only. The south side of these streets remains in shadow for most of the year. Given the maximum street elevation and the general width to height proportions of streets in the PS, many sections of street will not receive sunlight to the surface during the equinox. Shadow may also affect ground and first floors on the northside of these streets. This situation is alleviated at junctions and in some locations where street proportions are more favourable. The proposed revisions do not substantially alter these conditions, but will result in small additions of shadow along short sections of street.

**Private spaces**

Private spaces for residential and mixed use development are provided mainly in the form of internal courtyards in perimeter blocks. Typically, these blocks have north-south and east-west orientated frontages. The height of the enclosing buildings is related to the street frontage. Assuming maximum building height, the study shows limited access to sunlight to the surface of most residential courtyards on the equinox. These spaces are not likely to appear adequately sunlit throughout the year, and it is also unlikely that at least half of these areas would receive at least two hours of sunlight on the 21st March (equinox).

The proposed revisions do not substantially alter these conditions to private spaces, but may result in small additions of shadow. Consideration should be given to reducing the height of small sections of perimeter frontage to improve sunlight penetration into courtyards. Additional shadow is anticipated to residential spaces in City Block 9, as a result of the proposed gateway tower. It is essential that this shadow impact is minimised by ensuring a slender vertical form. In addition, non-residential land uses may be considered where shadow impact is greatest. It will also be important to consider passive solar gain and daylighting to commercial buildings, and proposals should indicate how reasonable access to daylight and sunlight from internal spaces will be achieved.

**Compensatory measures**

Compensatory measures should be considered as necessary at development management stage and include:

- Lowering of short sections of street frontage, within PS ranges;
- Increased width of street where flexible building lines are designated;
- Opening of small sections of the perimeter of the block on flexible building line frontages to increase sunlight penetration to private spaces;
- Proper set-back of additional floors on all external and internal frontages to avoid additional shadow impact;
- Avoiding upper floor connections across streets (bridges etc.) between buildings within the city block;
- Careful consideration of land uses and land use mix; and
- Building design measures, such as increased numbers of dual aspect units, larger windows, increased floor to ceiling height, more reflective materials etc.
Figure E1: Diagram showing a typical cross section along a main street in the PS (e.g. Mayor Street Upper) showing maximum sun elevation on the equinox, the summer solstice and the general 1:1 street proportion.

Figure E2, Shadow analysis 0900hrs, Equinox (21st March) - proposed revisions and as built in 2019.

Existing PS and as built in 2019.
Proposed PS.
Figure E3, Shadow analysis 1200hrs, Equinox (21st March)- proposed revisions and as built in 2019.

Existing PS and as built in 2019.
Proposed PS.
Figure E4, Shadow analysis 1500hrs, Equinox (21st March) - proposed revisions and as built in 2019.

Existing PS and as built in 2019.
Proposed PS.
Appendix F (3 Dimensional views)