

DOWNEY

29 Merrion Square, D02RW64

STATEMENT OF CONSISTENCY WITH PLANNING POLICY

**Proposed Strategic Housing Development
on Lands at 23-28 Prussia Street,
Dublin 7**

Applicant: Randalswood Construction Limited

December 2021

TABLE OF CONTENT

1.0	INTRODUCTION	3
2.0	NATIONAL POLICY AND GUIDELINES	3
2.1	Project Ireland 2040: National Planning Framework	4
2.2	Project Ireland 2040: National Development Plan 2021-2030	6
2.3	Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)	7
2.4	Housing for All: A New Housing Plan for Ireland.....	8
2.5	Affordable Housing Act 2021 & Housing Circular 28/2021	8
2.6	Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009).....	9
2.7	Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)	11
2.8	Delivering Homes, Sustaining Communities Best Practice Guidelines – Quality Homes for Sustainable Communities (2007).....	12
2.9	Sustainable Urban Housing: Design Standards for New Apartments (2020)	12
2.10	Urban Development and Building Heights Guidelines for Planning Authorities (2018)	14
2.11	Childcare Facilities: Guidelines for Planning Authorities (2001)	17
2.12	Childcare facilities operating under the Early Childhood Care and Education (ECCE) Scheme (Circular Letter: PL 3/2016).....	18
2.13	Retail Planning Guidelines (2012) and Retail Design Manual (2012)	19
2.14	Smarter Travel: A Sustainable Transport Future.....	20
2.15	Design Manual for Urban Roads and Streets (DMURS)	21
2.16	National Cycle Manual (June 2011).....	21
2.17	EIA Directive	22
2.18	Bird and Habitats Directive – Appropriate Assessment	22
2.19	The Planning System and Flood Risk Guidelines (2009).....	23
2.20	National Adaptation Framework: Planning for a Climate Resilient Ireland	23
2.21	Climate Action Plan 2019	24
2.22	Architectural Heritage Protection; Guidelines for Planning Authorities.....	25
3.0	REGIONAL POLICY AND GUIDELINES	25
3.1	Regional Spatial and Economic Strategy for the Eastern & Midland Region	26
3.2	Transport Strategy for the Greater Dublin Area 2016-2035	27
4.0	LOCAL PLANNING POLICY	28
4.1	Dublin City Development Plan 2016-2022	28
5.0	CONCLUSION	40

© Downey 2021

Downey Planning Document Control			
	Name	Date	Version
Prepared by	Donna Ryan MIPI Associate Director	November 2021	DRAFT_V_01
	Donna Ryan MIPI Associate Director	December 2021	DRAFT_V_02
Approved by	Donna Ryan MIPI Associate Director	December 2021	FINAL_V_02

1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02RW64, have prepared this Statement of Consistency with Planning Policy, on behalf of the applicant, Randalswood Construction Ltd. This statement accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on lands at Prussia Street, Dublin 7.

The proposed development subject to this SHD application provides for a total of 162 no. 'Build to Rent' units in 1 no. block ranging in height from 3-13 storeys over basement on lands at 23-28 Prussia Street, Dublin 7. A total of 22 no. car parking spaces are proposed within an underground basement, including motorcycle and bicycle parking; communal open space, roof terraces, and all associated ancillary site development infrastructure and landscape works. The proposed development will also provide for a primary pedestrian and cycle access route from TU Grangegorman Campus to Prussia Street, this has been designed in accordance with the Grangegorman SDZ Plan (amended by ABP Ref: ZE29N.ZE0005). The interface of this primary route with Prussia Street will be denoted by a proposed gatehouse feature.

This Statement of Consistency with Planning Policy has been prepared in accordance with Section 8 (1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016 and in accordance with the requirements of the Planning and Development Regulations 2001-2017 (as amended by Planning and Development (Strategic Housing Development) Regulations 2017) and the 'Strategic Housing Development: Section 4 Applications to An Bord Pleanála – Guidance for Applicants' issued by An Bord Pleanála.

This Statement demonstrates that the proposed development is consistent with the relevant national, regional and local planning policy and guidelines issued under Section 28 of the Planning and Development Act, 2000 (as amended). This Statement should be read in conjunction with the accompanying detailed documentation prepared by the design team.

For details of compliance with the quantitative standards for residential units of adopted 'Sustainable Urban Housing: Design Standards for New Apartments', 'Quality Housing for Sustainable Communities Best Practice Guidelines for Delivering Homes Sustaining Communities' and the Dublin City Development Plan 2016-2022, please refer to the Housing Quality Assessment Detailed Schedule of Accommodation prepared by Downey Architecture which is included as part of the architectural planning pack.

2.0 NATIONAL POLICY AND GUIDELINES

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following sections. The key national policy and guidance documents of relevance include:

- Project Ireland 2040: National Planning Framework
- Project Ireland 2040: National Development Plan 2021-2030
- Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)
- Housing for All: A New Housing Plan for Ireland

- Affordable Housing Act 2021 & Housing Circular 28/2021
- Sustainable Residential Development in Urban Areas and Best Practice Urban Design Manual Guidelines (2009)
- Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)
- Delivering Homes, Sustaining Communities Best Practice Guidelines (2007)
- Sustainable Urban Housing: Design Standards for New Apartments (December 2020)
- Urban Development and Building Heights: Guidelines for Planning Authorities (December 2018)
- Childcare Facilities: Guidelines for Planning Authorities (2001)
- Childcare Facilities Operating under the ECCE Scheme Circular PL 3/2016
- Retail Planning Guidelines (2012) and Retail Design Manual (2012)
- Smarter Travel: A Sustainable Transport Future
- Design Manual for Urban Roads and Streets (DMURS)
- National Cycle Manual (June 2011)
- EIA Directive
- Birds and Habitats Directive – Appropriate Assessment
- The Planning System and Flood Risk Guidelines (2009)
- National Adaptation Framework: Planning for a Climate Resilient Ireland
- Climate Action Plan 2019

2.1 Project Ireland 2040: National Planning Framework

The National Planning Framework is “*the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040*”. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the National Planning Framework that, “*a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages*”. It is also stated that there will be an ongoing shift in population and jobs to the east and to the counties around Dublin in particular. The NPF will support the future growth and success of Dublin as Ireland’s leading global city of scale, by better managing Dublin’s growth to ensure that more of it can be accommodated within and close to the city.

According to the National Planning Framework, Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. Dublin’s continued performance is critical to Ireland’s competitiveness.

The NPF states that, “*the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.*”

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and

often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *“prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.”*

In terms of Dublin City and the Metropolitan Area, the National Planning Framework 2040 states that:

“The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village. This means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly ‘greenfield’ development and requires a change in outlook.”

The NPF has a number of national policy objectives which are relevant to this application, which include:

National Policy Objective 3a: *“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.”*

National Policy Objective 11: *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

National Policy Objective 13: *“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.”*

National Policy Objective 27: *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.”*

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

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

It is evident that there is a strong emphasis placed on increased building heights in appropriate locations within existing urban centres and along public transport corridors. As such, it is respectfully

submitted that the proposed building heights ranging from 3 to 13 storeys over basement is in line with Government guidance and evolving trends for sustainable developments in urban areas.

Downey are of the considered opinion that the proposed residential development is in line with the objectives of the National Planning Framework as it states that, *“to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities”*. The National Planning Framework also states that, *“this is underpinned by ongoing population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a higher proportion of households in the rented sector”*. The proposed development is located in a strategic inner city location within Dublin City and as such is in keeping with the objectives set out in the NPF. The National Planning Framework also states that, *“while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (census data)”*. It is evident that Ireland is a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. It is stated within the Project Ireland 2040 plan that, *“in many European countries it is normal to see 40-60% of households living in apartments.”*

Apartment developments have become an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts investment that will result in greater delivery of apartments in Ireland’s cities and towns and other appropriate locations. It is evident that apartment developments are required in urban areas to meet the current demand for housing, particularly in Dublin. It is therefore considered that the provision of 162 no. new apartments with complementary uses on the subject site will assist in achieving the objectives of the National Planning Framework.

2.2 Project Ireland 2040: National Development Plan 2021-2030

Project Ireland 2040 National Planning Framework (NPF), which sets the overarching spatial strategy for the next twenty years, includes the National Development Plan, which sets out the ten year investment strategy. The recent Review of the NDP was led by the National Investment Office in the Department of Public Expenditure and Reform and was structured in two phases with associated outputs. The review was founded upon a strongly evidence based approach, building upon the extensive data and analyses that have been produced by the NIO and by the work of IGEEES and other policy units across other Government Departments and agencies, including other newly commissioned and targeted research. The NDP sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in Housing for All and will enable a step-change in investment to ameliorate the effects of climate change.

Outlined in the NDP, the key achievements of NPF over 2018-2021 and in relation to housing includes delivery of over 63,000 homes and 26,256 new social housing homes. To underpin NPF population targets, a detailed assessment of structural housing demand identifies demand for almost 400,000 new homes in Ireland between 2020 and 2031, or 33,000 new homes per annum. At city and county

level, this is broken down to form a Housing Supply Target (HST) for each local authority area, to guide planning for future development.

The NPF housing supply target has been refined to reflect recent (2020) ESRI research based on NPF population growth, taking into account both existing demand and a legacy of undersupply to date. There is now a need to accommodate around 600,000 new households by 2040, with the Department of Housing planning to deliver an average of 33,000 homes per annum to 2030 including an average of 10,000 new social homes each year and an average of 6,000 affordable homes each year.

Set out in the NDP, public capital investment must, as a top priority, support the delivery and location of the homes that society will need over the next decade and beyond, while also ensuring that in the future the pattern of housing development underpins the development of more compact higher-density cities, towns and other areas. It is also a priority to enable infill development, with up to 50% of future housing in our cities and major urban centres and 30% elsewhere to be provided within existing built-up areas serviced by existing facilities and along high-capacity public transport corridors.

The proposed development will provide high density, sustainable residential development in close proximity to a high frequency bus network, LUAS line, and cycling infrastructure, all of which promotes compact urban growth and a good quality of life. Prussia Street is located between the Grangegorman and Stoneybatter areas of Dublin City, these have become attractive and vibrant areas for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities and the various sports clubs and centres within the area.

2.3 Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)

'Rebuilding Ireland, an Action Plan for Housing and Homelessness', provides a multi-stranded, action-oriented approach to achieving many of the Government's key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of five key pillars which are: *addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing*. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- Addressing the unacceptable level of households, particularly families, in emergency accommodation;
- Moderating rental and purchase price inflation, particularly in urban areas;
- Addressing a growing affordability gap for many households wishing to purchase their own homes;

- Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty;
- Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth; and,
- Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.

The provision of 162 no. 'Build to Rent' units within this proposed scheme on the application site will help the Government to achieve the objectives of the Housing Action Plan by providing an alternative to house sharing thus freeing up existing housing stock for families. Thus, it is submitted that the proposed development is consistent with the policy in this regard.

2.4 Housing for All: A New Housing Plan for Ireland

The Housing for All: A New Housing Plan for Ireland states that Ireland's housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent. As per, Housing for All provides four pathways to achieving four overarching objectives:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 homes must be provided every year between now and 2030. Increased housing output is needed in all sectors - private, affordable, and social - to meet the needs of people in a wide variety of circumstances.

It is submitted that provision of 162 no. 'Build to Rent' residential units on the subject site will help the Government to achieve the objectives of the Housing for All Plan. Therefore, it is considered that the proposed development is consistent with the development framework in this regard.

2.5 Affordable Housing Act 2021 & Housing Circular 28/2021

In July 2021, the Affordable Housing Act 2021 was published, aiming to address problems associated with the high cost of housing for the portion of the population that do not qualify for social housing. Coming to effect from 3rd September 2021, the Housing Circular 28/2021, amends Part V of the Planning and Development Act 2000. The Programme for Government contained commitments in relation to expanding Part V to encompass affordable purchase and cost rental units and introducing

affordable homes requirements to Part V. Part 6 of the Affordable Housing Act 2021, which was enacted on 21 July 2021, gives effect to this commitment.

The principal change to Part V made by these amendments is to increase the Part V contribution for new housing developments from 10% social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing.

It is noted that these changes to Part V primarily apply to land purchased on or after 1 August 2021. Any new planning permissions for housing development on that land will have a 20% Part V requirement. However, a 10% Part V requirement will apply where land already has planning permission or was purchased between 1 September 2015 and 31 July 2021 and planning permission is granted before 31 July 2026.

It is considered that the proposed development is consistent with the Affordable Housing Act 2021, Housing Circular 28/2021, and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing in this case, i.e., an overall total of 32 units. For further details, please refer to the enclosed Part V allocation drawings enclosed with the submitted application.

2.6 Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)

This document reviews and updates the Residential Density Guidelines (1999), and its aim is to assist both planning authorities and developers in meeting certain standards in the design of residential development. The main objective of the Sustainable Residential Development in Urban Areas Guidelines is to produce high-quality sustainable developments through providing:

- quality homes and neighbourhoods;
- places where people actually want to live, to work and to raise families; and,
- places that work - and will continue to work – not just for us, but for our children and for our children’s children.

The Guidelines state that sustainability is about the integration of schools, community facilities, employment, transport and amenities with the housing development process in a timely, cost-effective way.

The aim of the Guidelines is to set out the key planning principles which should be reflected in development plans and local area plans and which should guide the preparation and assessment of planning applications for residential developments in urban areas. These Guidelines support higher residential densities on ‘brownfield’ site’, particularly for such sites along public transport corridors. The subject site is considered an inner city brownfield site and is located in close proximity to a high-frequency bus network and extensive cycle infrastructure in the inner core of Dublin City.

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the *'Urban Design Manual – A Best Practice Guide'* including: *Context; Connections; Public Realm; and Detailed Design*, of which Planning Authorities are recommended to assess planning applications. It is evident that the form, layout, architectural and landscaping design of the proposed development have been informed by the development's place and time.

The Guidelines support a plan-led approach to development in accordance with the Planning and Development Act, 2000 (as amended) and state:

"The scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy."

In this regard, the subject site is zoned for residential development under the Dublin City Development Plan whereby residential is a permissible use.

The Guidelines also support higher residential densities particularly for sites within town centre locations and along public transport corridors, as it states: *"In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes"*. In this regard, the subject site is situated in an inner city location in close proximity to high-quality and high frequency transport infrastructure within Dublin City. Furthermore, the site is located close to the existing amenities within the Stoneybatter and Grangegorman area and the full range of retail and other facilities within the area and the city centre.

In terms of planning for sustainable neighbourhoods, there is focus on *"planning at the district or neighbourhood scale within larger towns and cities, whether on brownfield or green-field sites"*. The Guidelines state that, *"national policy makes it clear that sustainability is not confined to the physical environment. Sustainability also includes the concept of stable, integrated communities, and planning for such communities must embrace both tangible issues – such as the timely provision of school places – and the intangible, such as people's perception of what constitutes an attractive, secure environment in which to rear children. Planning objectives at the district / neighbourhood scale can thus be grouped under four main themes:*

- (a) Provision of community facilities;*
- (b) Efficient use of resources;*
- (c) Amenity / quality of life issues; and*
- (d) Conservation of the built and natural environment."*

The document goes on to state that, *"sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally"*. It goes on to outline the importance of the provision of schools, community centres, healthcare facilities and district/neighbourhood centres to the sustainability of communities. Given the location of the site within the inner core of Dublin City, there is already an extensive and vast range of services in place to serve the anticipated and planned increase in residential dwellings and population growth.

The Guidelines state that the “*definition of sustainable development includes maximising access to and encouraging use of public transport, cycling and walking. Spatial planning has a fundamental role in promoting more sustainable travel patterns and helping to reverse recent trends which have seen a decreasing share of people travelling to work by bus or bicycle or on foot*”. It is submitted that the proposed development is consistent with this objective as it proposes a ‘Build to Rent’ scheme in close proximity to a wide range of amenities and facilities, is adjacent to high quality public transport and within walking/cycling distance of all amenities and facilities on offer in the Grangegorman area and surrounding environs, including the TU Dublin Grangegorman campus, the Park Shopping Centre, and the many amenities and facilities throughout the area.

Downey are of the considered opinion that the proposed development represents a development that has been carefully and appropriately designed, considering its neighbouring properties and will integrate successfully with its environs, particularly given the planned re-development of the area in the coming years. The proposed development has had regard to the surrounding environment and carefully assesses the proposal considering same. The proposed scheme positively contributes to the character and identity of the surrounding neighbourhood and is also considered to be of an appropriate density which will help to support efficient public transport. It is submitted that the proposed development would be a positive addition to the surrounding built environment of Prussia Street and to the identity of the locality. Furthermore, it is considered that the proposed buildings will meet the aspirations of a range of people and the design and layout of such allows easy access by all. For further information on the proposed development’s consistency with the ‘*Urban Design Manual*’, please refer to the Architectural/Urban Design Statement prepared by Downey Architecture.

2.7 Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)

The Department’s policy statement ‘*Delivering Homes, Sustaining Communities*’ provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is recognised as being central to creating a sustainable community.

Sustainable neighbourhoods are areas where an efficient use of land, high quality design and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.

The ‘*Delivering Homes, Sustaining Communities*’ policy statement is accompanied by Best Practice Guidelines entitled ‘*Quality Housing for Sustainable Communities*’. The purpose of these Guidelines is to promote high standards in the design and construction and the provision of residential and services in new housing developments. Best use of land is encouraged and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of a new housing

scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

2.8 Delivering Homes, Sustaining Communities Best Practice Guidelines – Quality Homes for Sustainable Communities (2007)

The aim of these Guidelines is to identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience to be particularly relevant. The guidelines set out some recommended standards in terms of space provision and room sizes, etc.

The proposed scheme has been cognisant of the need to facilitate a high standard of living for future occupants, while representing a proposal that is conducive to complimenting and augmenting the established residential character of the surrounding area. In this regard it is noted that all of the residential units have been designed to comply with the room standards as set out in these Guidelines, and the City Development Plan. Downey Architecture have also prepared an Architectural/Urban Design Statement for this scheme and is submitted under a separate cover. This outlines the rationale behind the design of the scheme and how it will contribute to a positive and attractive residential scheme.

This planning application is accompanied by a Housing Quality Assessment (HQA) document, which has been prepared Downey Architecture, which illustrates how the proposed development will comply with the required standards that have been set out in this assessment.

2.9 Sustainable Urban Housing: Design Standards for New Apartments (2020)

The ‘Sustainable Urban Housing: Design Standards for New Apartments’ build on the content of the 2015 apartment guidance, much of which remains valid, particularly with regard to design quality safeguards such as internal space standards for apartments, internal storage and amenity space. The Guidelines state that, *“in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland’s five cities (Dublin, Cork, Limerick, Galway and Waterford), more than 30,000 of which are required in Dublin City and suburbs, which does not include additional pent-up demand arising from under-supply of new housing in recent years”*. It is also stated that it is *“critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.”*

The Guidelines also state that, *“aspects of previous apartment guidance have been amended and new areas addressed in order to:*

- *enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- *make better provision for building refurbishment and small-scale urban infill schemes;*
- *address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and*

- *remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduces costs.”*

The Guidelines note that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish and European averages in numbers of households living in apartments and the importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

As stated within the Guidelines, *“ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include:*

- *Young professionals and workers generally;*
- *Those families with no children;*
- *‘Downsizers’; and,*
- *Older people, in both independent and assisted living settings.”*

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard, it is considered that the proposed development falls within *(1) Central and/or Accessible Urban Locations* as it meets the criteria for this location in that the site is within easy walking distance of a public transport corridor, i.e., high frequency bus network and future BusConnects CBC. This type of location is therefore suitable for large scale and higher density development. Thus, it is considered that the subject site is suitable for a higher density apartment development as proposed. The Guidelines also have specific planning policy requirements (SPPRS), which include:

Specific Planning Policy Requirement 1: *“Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).”*

Specific Planning Policy Requirement 3: *“Minimum Apartment Floor Areas:*

- *Studio apartment (1 person) 37 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*
- *2-bedroom apartment (4 persons) 73 sq.m*
- *3-bedroom apartment (5 persons) 90 sq.m”*

Downey are of the considered opinion that the proposed development complies with the SPPRS/requirements of the *‘Sustainable Urban Housing: Design Standards for New Apartments’*. This planning application includes a Housing Quality Assessment and a detailed daylight, sunlight and internal light analysis report, in accordance with Chapter 6 of the Guidelines. The proposed development will help to meet the current demand for apartment type developments. For

further information in this regard, please refer to the enclosed architectural drawings and detailed Housing Quality Assessment prepared by Downey Architecture which provides confirmation that the proposed development is consistent with the design standards of these Guidelines.

Specific Planning Policy Requirement	Compliance
SPPR1 (Housing Mix)	In compliance
SPPR2 (Building Refurbishment and Urban Infill Development on sites up to 0.25ha)	Not Applicable; SPPR1 applies to the entire development
SPPR3 (Minimum Apartment Floor Areas)	In compliance with the standards
SPPR4 (Dual Aspect Ratios)	In compliance with the requirements
SPPR5 (Floor to Ceiling Height)	In compliance with the requirements
SPPR6 (Lift and Stair Cores)	In compliance with the required quantum
SPPR7 (Specific BTR Developments)	In compliance with the requirements; tenures have been described where relevant; Resident Support Facilities and Resident Services and Amenities are provided within the proposed scheme
SPPR8 (Qualified as BTR Developments)	In compliance with the requirements

Table 1 – Compliance with Specific Planning Policy Requirements

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

The ‘Urban Development and Building Heights, Guidelines for Planning Authorities’ are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibility and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that, “a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.”

The document states that it is critically important that development plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only desirable but a fundamental policy requirement. Locations with the potential for comprehensive

urban development or redevelopment should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

Section 1.10 of the Guidelines state *“the rationale [...] for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas”*. It continues, *“in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality.”*

Section 1.11 states *“these guidelines therefore set out national planning policy that:*

- *Expand on the requirements of the National Planning Framework; and*
- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations.”*

The proposed development at Prussia Street is consistent with these objectives and with the physical and social infrastructure already in place can accommodate the proposed heights of 3-13 storeys.

The following Special Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

Specific Planning Policy Requirement 1 – *“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.”*

The proposed development at Prussia Street is situated at a strategic location within the inner core of Dublin City and is in close proximity of high frequency public transport and is capable of supporting taller buildings and increased density. The lands are well served by public transport (bus and LUAS), as well as cycling infrastructure, and as such are suitable for increased height and density.

Specific Planning Policy Requirement 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 proposed development seeks to provide for a 'Build to Rent' scheme that is surrounded by a mix of uses. In the immediate vicinity of the subject site, Prussia Street and Manor Street offer a wide range of retail convenience shops, post office, restaurants and cafés. This is in conjunction with the existing retail, community and commercial facilities within the area and the City Centre, these include shopping centres, cultural and community centres, sports clubs, parks, playgrounds, etc. A Community and Social Infrastructure Audit prepared by Downey is enclosed with this planning application and provides an overview and assessment of existing infrastructure and facilities within the Grangegorman area and surrounding environ that ensures compliance with the aforementioned specific planning policy.

Specific Planning Policy Requirement 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.”*

It is submitted that this SHD planning application contains sufficient reports, documentation, plans and justification to support the proposed development and outlines how the development is in accordance with the relevant planning policies and guidelines pertaining to the area. Such documents include architectural plans and elevations, Architectural/Urban Design Statement, DMURS statements, Traffic Assessment, AA Screening, planning reports, engineering reports and daylight and shadow analysis.

Specific Planning Policy Requirement 4 – *“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.”*

The proposed development provides for a high-quality development of 162 no. 'Build to Rent' units within 1 no. block that will range in height from 3-13 storeys over basement. The proposed development provides for a density of 424 units per hectare (162 units on 0.38 hectares) which is considered appropriate for the area and in accordance with the national guidelines referred to in

SPPR4. Additionally, the proposed scheme provides for a mix of unit types and layouts, thus ensuring an appropriate variety of design and typology.

Specific Planning Policy Requirement	Compliance
SPPR1 <i>(building height and density)</i>	In compliance
SPPR2 <i>(building height and mix of uses)</i>	In compliance
SPPR3 <i>(Assessment of planning applications)</i>	In compliance considering content of application submission
SPPR4 <i>(development of greenfield/edge of city/town centre sites)</i>	In compliance

Table 2 – Compliance with Specific Planning Policy Requirements

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments and that greater heights are achievable. The proposed development steps in height from 3-13 storeys with cognisance given to existing residential dwellings and the provision of appropriate separation distances, as well as the permitted developments in the area. The existing lands are essentially brownfield lands that are zoned for residential development and are serviced with road and public transport infrastructure. Therefore, high density residential development can be achieved on the lands in accordance with the aforementioned policy guidelines.

2.11 Childcare Facilities: Guidelines for Planning Authorities (2001)

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

The following definition of Childcare is included in the Guidelines:

“In these Guidelines, “childcare” is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education, and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.”

For housing schemes, the Guidelines provide a benchmark provision of 1 no. 20 space childcare facility per 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The recommendations provided within the Guidelines must be considered in the context of the ‘Sustainable Urban Housing: Design Standards for New Apartments’ (Dec. 2020), which state that:

“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.”

As recommended in the Guidelines, 1 no. childcare facility may be required as part of the proposal to cater for the influx of population arising from the proposed scheme. It is worth noting that as stated within the apartment guidelines, “one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”. A Childcare Provision Assessment Report has been prepared by Downey and submitted with this Application which demonstrates that there is sufficient capacity to cater for the proposed development.

The Childcare Provision Assessment Report provides a detailed assessment of the existing childcare facilities within the subject area, thus assessing the current capacity of the surrounding environs. The report confirms that the proposed development would generate an approximate requirement for only 1 no. childcare space. Given the calculations within this report and overall assessment of the area, it is submitted that the provision of a childcare facility at this location would seem unnecessary when the required demand to sustain it would not be available. As such, the omission of a childcare facility on site is justified given the amount of existing childcare facilities and pertaining available capacity, the approximate demand that would be generated by the proposed development and the commercial viability of a crèche within the site.

In light of the above, it is submitted that the current provision of childcare facilities in the area, as well as the nature of the proposed development in terms of its population target and with regards to the estimated demand generated by the proposed scheme, is consistent with the Childcare Facilities Guidelines.

2.12 Childcare Facilities Operating under the Early Childhood Care and Education (ECCE) Scheme (Circular Letter: PL 3/2016)

The purpose of this Circular, issued on 31st March 2016, is to revise the Childcare Facilities Guidelines for Planning Authorities 2001, and having regard to the extension of the ECCE scheme and the associated increased demands on childcare facilities with effect from September 2016, planning authorities are hereby requested to:

- Expedite all pre-planning application consultation requests from Childcare facility providers in relation to proposals to extend opening hours, to increase capacity or to provide new facilities.
- Expedite, insofar as is possible, consideration of all planning applications or Section 5 declaration submissions in respect of childcare facilities in order to facilitate the expansion of required capacity as appropriate.

The Childcare Facilities Guidelines for Planning Authorities 2001 outline general planning related standards for childcare facilities. Planning Authorities are advised that the Child Care (Pre-School Services) Regulations 2006 set out a range of childcare related standards for childcare facilities as stipulated by the Department of Children and Youth Affairs. The Child and Family Agency, also known as Tusla, is responsible for inspecting pre-school services under, and enforcing compliance with, the afore-mentioned 2006 Regulations.

In light of the foregoing, planning authorities are requested to exclude matters relating to childcare facility standards outlined in Appendix 1 of the Childcare Facilities Planning Guidelines 2001 - including the minimum floor area requirements per child - from their consideration of planning applications relating to childcare facilities and to solely focus on planning related considerations that fall within the remit of the Planning and Development Act 2000, as amended, in the determination of such planning applications.

As per the detailed assessment carried out in the Childcare Provision Assessment Report prepared by Downey and enclosed with the application, the proposed development is expected to generate an approximate requirement for only 1 no. childcare space. Moreover, the nature and scale of the proposed scheme and the pertaining demand generated by same is not considered significant enough to require the provision of a childcare facility on site.

Furthermore, it is considered that the 'Build to Rent' nature of the development will predominantly consist of a young professional single workforce therefore the development would not generate the same requirement for a childcare facility as a standard apartment scheme.

Downey are of the professional opinion that, given the potential demand generated by the proposed development and the available capacity within the area, the proposed development would not require the provision of a childcare facility on site and thus the omission of a crèche facility from this proposed Build to Rent scheme is considered to be justified in this instance. Therefore, it is suggested that the proposed development is consistent with Circular PL 3/2016.

2.13 Retail Planning Guidelines (2012) and Retail Design Manual (2012)

The Retail Planning Guidelines, which were first issued in 2000 and subsequently revised in 2005, and subsequently the third iteration of the Guidelines were published in 2012 accompanied by the Retail Design Manual (2012), providing the strategic policy framework for the spatial distribution of new retail development. Therefore, the Guidelines provide a comprehensive framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and retailers and developers in formulating development proposals.

The guidelines specifically state that local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly

and persons with mobility impairments, families with small children, and those without access to private transport. The guidelines identify five key objectives, of equal weight, which are as follows:

- to ensure that in future all Development Plans incorporate clear policies and proposals for retail development,
- to facilitate a competitive and healthy environment for the retail industry of the future,
- to promote forms of development which are easily accessible, particularly by public transport and in a location which encourages multi-purpose shopping, business and leisure trips,
- to support the continuing role of town and district centres, with
- a presumption against large retail centres located adjacent or close to existing, new or planned national roads/motorways.

The Guidelines clearly acknowledge that it is critical for the proper planning and sustainable development of an area that new retail development is located at the optimum location having regard to the type of retail offering and the context of the existing environs.

It is submitted that the proposed development also provides for a café accessible to the general public with on-street access from Prussia Street and from the proposed pedestrian pathway which connects the site with the Grangegorman campus. It is considered that this provision of commercial use will encourage and strengthen community bonds. Furthermore, the injection of new population into this area within Dublin City will enable the local shops to thrive and will also have the population to support the sustainable growth of the city. This is considered to be consistent with the foregoing Guidelines.

2.14 Smarter Travel: A Sustainable Transport Future

In summary, *'Smarter Travel: A Sustainable Transport Future'* states that, *"to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility."*

The five key goals of this transport policy are as follows:

- *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.*
- *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.*
- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.*
- *Reduce overall travel demand and commuting distances travelled by the private car.*
- *Improve security of energy supply by reducing dependency on imported fossil fuels.*

It is considered that the proposed development complies with *'Smarter Travel: A Sustainable Transport Future'*. The subject site is strategically located within less than 200 metres walking distance

of Dublin Bus services and the proposed BusConnects transport corridor, i.e., Blanchardstown to City Centre. The proposed development provides housing within Dublin City and in close proximity to a number of Dublin Bus services and LUAS stops which will promote a modal shift to sustainable transportation. The proposed development also provides considerable secure, covered bicycle parking for future residents to again encourage use of sustainable modes of transportation. Therefore, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation.

2.15 Design Manual for Urban Roads and Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) 2013 and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The Transport drawings and documentation prepared by Lohan & Donnelly Consulting Engineers provide further details in respect of the compliance of the proposed development with the provision of DMURS and are enclosed as part of this SHD planning application.

2.16 National Cycle Manual (June 2011)

The *'National Cycle Manual'* 2011 embraces the Principles of Sustainable Safety as this will offer a safe traffic environment for all road users including cyclists. It offers guidance on integrating the bike in the design of urban areas. The Manual challenges planners and engineers to incorporate cycling within transport networks more proactively than before.

Outlined in the Manual, many residential and access streets already offer a high quality of service to cycling. Cycling two-abreast on quiet, interesting, well-surfaced streets and roads can be attractive to cyclists. In many cases there is no physical infrastructure involved, other than the self-evident and self-enforcing nature of the environment.

The Manual also gives guidance on the minimum number of spaces which should be provided initially at new private and public facilities in urban areas. For housing developments, this is stated to be:

- 1 no. private secure bicycle space per bed space (note - design should not require bicycle access via living area), minimum 2 spaces; and
- 1 visitor bicycle space per two housing units.

The following gives an overview of the varying characteristics of parking at residential areas that should be considered in determining the most appropriate parking facility.

- Convenience is essential for frequently used bicycles, and preferably not via living areas;
- Private parking should accommodate residents and visitors; and,
- Shared parking facilities can be suitable for multiple dwellings (e.g. apartment complex).

It is submitted that the proposed development provides considerable secure, covered bicycle parking for future residents to again encourage use of sustainable modes of transportation and this is in

compliance with Section 4.17 of the Design Standard for New Apartments (December 2020). Please refer to the enclosed Transport drawings and documentation prepared by Lohan & Donnelly Consulting Engineers for further details in this regard.

2.17 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4(2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations 2001 (as amended). The proposed development in this regard is sub-threshold.

Furthermore, having regard to Annex III of the EIA Directive 2014/52/EU and the guidance contained in the Department's Environmental Impact Assessment Guidance for Consent Authorities regarding Sub-Threshold Development (2018), and in particular:

- The size and design of the whole project;
- Cumulation with other existing and/or approved projects;
- The use of natural resources, in particular land, soil, water and biodiversity;
- The production of waste;
- Pollution and nuisances;
- The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; and,
- The risks to human health (for example due to water contamination or air pollution).

It is considered that there will be no likely significant effects on the environment arising from the proposed development. Thus, having regard to the above, and in particular to the nature, scale and location of the proposed project, by itself and in combination with other plans and projects, it is considered that an Environmental Impact Assessment is not required for this project. For further information in this regard, please refer to the EIA Screening Report prepared to accompany this planning application.

2.18 Bird and Habitats Directive – Appropriate Assessment

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). OPENFIELD Ecological Services has prepared a report for Screening for Appropriate Assessment for the proposed development. This screening report has evaluated the proposed development at Prussia Street to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use.

The screening report concludes that this proposed development is not located within or directly adjacent to any SAC or SPA. An assessment of the aspects of this project has shown that the possibility of any significant impacts on any European Sites are not likely to occur, whether arising from the project or in combination with other plans and projects. The Appropriate Assessment procedure is therefore concluded at this Screening Stage and a detailed (Stage 2) Appropriate Assessment is not required. For further information in this regard, please refer to the Screening Report for Appropriate Assessment by OPENFIELD Ecological Services.

2.19 The Planning System and Flood Risk Guidelines (2009)

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a site-specific flood risk assessment.

In accordance with these Guidelines, Lohan & Donnelly Consulting Engineers carried out a flood risk assessment of the subject site. The site has been assessed in accordance with the Flood Risk Management Guidelines with appropriate mitigation measures proposed such as blue roof systems in combination with green roofs proposed as part of the scheme. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy. For further information in this regard, please refer to the Flood Risk Assessment prepared by Lohan & Donnelly Consulting Engineers which accompanies this SHD planning application.

2.20 National Adaptation Framework: Planning for a Climate Resilient Ireland

In accordance with the Climate Action and Low Carbon Development Act 2015, this National Adaptation Framework (NAF) specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This NAF and its successors will set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are mainstreamed into all local, regional and national policy making.

The 'Built Environment and Spatial Planning' section within this Framework recognises that "*climate change considerations need to be taken into account as a matter of course in planning-related decision making processes and that the deepening of adaptation considerations in the planning and building standards processes is considered the most appropriate way of increasing the resilience of the built*

environment". Furthermore, *"effective planning reduces vulnerability to the negative effects of climate change by integrating climate considerations into decision making in order to avoid inappropriate forms of development in vulnerable areas and promoting compact development in less vulnerable areas"*. It is important to mention that this Framework envisions 'flood resilience' and 'access to wildlife and green space' as no-regret benefits of effective adaptation which would continue to be worthwhile regardless of future climate scenarios.

As such, the proposed development has taken into consideration the context of the site and it can be noted that a Flood Risk Assessment has been prepared by Lohan & Donnelly Consulting Engineers, with appropriate mitigation measures proposed such as blue roof systems in combination with green roofs. Thus, the proposed development with access to high-quality green communal space and introduction of best practice energy efficiency measures as required to meet the Energy Strategy and Building Regulations, and promoting a compact urban form for 'less vulnerable areas' is consistent with this national framework.

2.21 Climate Action Plan 2019

Climate disruption is already having diverse and wide-ranging impacts on Ireland's environment, society, economic and natural resources. The Climate Action Plan 2019 sets out an ambitious course of action over the coming years to address this issue. The Plan clearly identifies the nature and scale of the challenge. It outlines the current state of play across key sectors including Electricity, Transport, Built Environment, Industry and Agriculture and charts a course towards ambitious decarbonisation targets. The Plan sets out governance arrangements including carbon-proofing policies, establishment of carbon budgets, a strengthened Climate Change Advisory Council and greater accountability to the Oireachtas.

The Plan clearly recognises that Ireland must significantly step up its commitments to tackle climate disruption. The leadership role both the Government and public bodies can play in taking early action on climate is fundamental to achieving our decarbonisation goals. The Plan notes that the built environment accounted for 12.7% of Ireland's greenhouse gases in 2017. It is important that we improve the energy efficiency of our buildings, including our homes, workplaces and schools, by meeting higher energy performance standards and by increasing retrofit activity. This will not only reduce Ireland's dependence on fossil fuels, but will also improve our living standards by making our buildings more comfortable, healthier, safer, and less costly to heat.

Our buildings are 70% reliant on fossil fuels, including oil fired boilers; over 80% of our homes and other buildings assessed for their BER have a rating of C or worse; and the current annual retrofit activity for existing stock is far too limited (approximately 23,000, mainly shallow, retrofits). A hierarchy of the most cost effective investments underpin this, including:

- Improving the fabric of buildings
- District heating in commercial buildings
- Switching from oil burners to heat pumps
- Setting new building standards.

As such, the proposed development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions in line with the requirements of the Action Plan.

2.22 Architectural Heritage Protection; Guidelines for Planning Authorities

Guidelines entitled Architectural Heritage Protection for Places of Public Worship were issued by the Minister for the Environment, Heritage and Local Government in 2003 under S.52 (2) of the Planning and Development Act 2000 (as amended), and were subsequently amended in 2007. In December 2004, the Minister for the Environment, Heritage and Local Government published guidelines under S.52 (1) entitled Architectural Heritage Protection Guidelines for Planning Authorities which incorporated the S.52 (2) guidelines as Chapter 5. The Architectural Heritage Protection Guidelines for Planning Authorities were formally issued to the planning authorities in February 2005. Following the transfer of functions, the Minister for Arts, Heritage and the Gaeltacht has decided to reissue the Architectural Heritage Protection Guidelines for Planning Authorities. It should be noted that the main text has not been amended.

The proposed multi-storey development will occupy a large site assembled from five previously demolished 18th and 19th century houses. Three of the old houses disappeared during the second half of the 20th Century, and the various sites were assembled under a single owner. Two houses were demolished during the early 21st Century due to their unsafe condition. Only a single 19th Century house survives on the site, having been heavily modified during the late 20th Century.

Therefore, it is proposed to carefully remove the remaining ground floor front wall to Nos. 28 Prussia Street, and to tidy up the remaining masonry nib that extends from the corner with No. 29 Prussia Street. Moreover, prior to the commencement of the works on site, the final details of all repairs and modifications to the boundary wall shared between DIT and the subject property will be agreed between both parties, and with Dublin City Council. The foundations to the already demolished houses will be recorded in photographs and measured survey when they are exposed during the site clearance.

A detailed Heritage Impact Assessment has been carried out by MESH Architects, enclosed with the applications. This also includes Conservation Strategies for Shared and Adjacent Properties, which we invite the Board to refer to.

3.0 REGIONAL POLICY AND GUIDELINES

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly)
- Transport Strategy for the Greater Dublin Area 2016-2035

3.1 Regional Spatial and Economic Strategy for the Eastern & Midland Region

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment and infrastructure capacity.

In conjunction with the NPF, the RSES predicts *Dublin City and Suburbs* to experience continued population growth over the period 2019-2031 with a predicted increase of 220,000. The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal are the following:

Regional Policy Objective (RPO) 4.3 – *“Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

Regional Policy Objective (RPO) 5.3 – *“Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.”*

The proposed development at Prussia Street is located on brownfield urban lands in an inner city location which is highly accessible and provides for a high-density development in close proximity to a high frequency bus network, future BusConnects CBC, existing and planned cycling infrastructure. Therefore, it is considered that the proposed development is consistent with the aforementioned objectives and will further support sustainable travel patterns.

Regional Policy Objective (RPO) 5.4 – *“Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*

It is submitted that the provision of a high-quality and high-density development consisting of 162 no. ‘Build to Rent’ units as proposed within this SHD planning application at Prussia Street will assist in achieving the aforementioned objective and it also complies with the pertaining policies and standards. For further details on how the proposed development is in accordance with this policy, please refer to the Housing Quality Assessment and Architectural/Urban Design Statement prepared by Downey Architecture which are included as part of the architectural planning packs.

Regional Policy Objective (RPO) 5.5 – *“Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”*

The proposed scheme is located on existing zoned and serviced lands, adheres with the policies and objectives of the RSES for the Eastern & Midland Regional Assembly area and will provide a high-quality development which will further service and contribute to the re-development and consolidation of the area.

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies. RPO 4.1 states:

“In preparing Core Strategies for development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.”

RPO 4.2 states:

“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.”

It is submitted that the proposed development on existing zoned, serviced lands will adhere with the policies and objectives of the Regional Spatial and Economic Strategy for the Eastern & Midland Regional Assembly area and will contribute to providing additional housing units and employment opportunities within the existing envelop of Dublin City and Suburbs.

3.2 Transport Strategy for the Greater Dublin Area 2016-2035

This transport strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). The purpose of the Strategy is: *“To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.”*

The core of the strategy seeks the better integration of land use planning and transport planning. This can be achieved through the consolidation of development into higher order centres. In terms of the provision of housing, the strategy seeks to directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.

The proposed development at Prussia Street seeks to redevelop an underutilised infill site in an inner city location within walking distance of high-quality public transportation and cycling infrastructure, as such it is considered an appropriate form of development in the context of supporting the vision and objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.

4.0 LOCAL PLANNING POLICY

This section of the report provides an account of the relevant local planning policy framework pertaining to the application site and proposed development, all of which is contained within the Dublin City Development Plan 2016-2022.

4.1 Dublin City Development Plan 2016-2022

4.1.1 Overarching Considerations

The subject site is located within the functional area of Dublin City Council. The development of the site is therefore informed by the policies and objectives of the Dublin City Development Plan. The policies and objectives of the City Development Plan are underpinned by the following vision:

“Within the next 25 to 30 years, Dublin will have an established international reputation as one of Europe’s most sustainable, dynamic and resourceful city regions. Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, a vibrant culture and a diverse, smart, green, innovation-based economy. It will be a socially inclusive city of urban neighbourhoods, all connected by an exemplary public transport, cycling and walking system and interwoven with a quality bio-diverse green space network. In short, the vision is for a capital city where people will seek to live, work, experience, invest and socialise, as a matter of choice.”

“Our 30 year vision is for a zero carbon city with all energy coming from renewable energy sources. All buildings will have been built or retrofitted to near zero energy building standards, which will provide comfortable, warm, living and working environments. We will halve the use of ‘conventionally-fuelled’ cars in urban transport by 2030 and phase them out by 2050; achieve essential CO2-free city logistics in Dublin by 2030. Within 30 years we will move close to zero fatalities in road transport. In line with this goal, we will aim to halve road casualties by 2022. This council will work with its neighbouring local authorities and the National Transport Authority to achieve a doubling of all active travel and public transport trips and to halve private vehicular trips to Dublin by 2030.”

4.1.2 Core Strategy and Housing Strategy

The purpose of the Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

The vision of the Dublin City Development Plan is to grow Dublin in a sustainable fashion as it enters a period of sustained economic and population growth. *“Dublin city in its entirety lies within the metropolitan area and the RPGs give direction to Dublin city as the ‘gateway core’ for high-intensity clusters, brownfield development, urban renewal and regeneration”*. Significant housing demand exists in the Dublin city area and the proposed development will assist in the delivery of much needed housing within the city.

Further to this, the plan states *“a further key aspect is that future expansion, whether housing or mixed-uses, occur in tandem with high-quality rail-based public transport and on a phased basis. The development plan incorporates these principles in a settlement hierarchy which prioritises the inner city, key district centres and strategic development and regeneration areas (SDRAs)”*. The subject site benefits from an inner city location in close proximity to a wide range of amenities and services, and thus is considered appropriate for residential development.

The site in question is located within the inner core of Dublin city and within walking distance of a high frequency bus network, cycling infrastructure, and proposed BusConnects CBC ensuring development of these lands is consistent with development plan policy. The Development Plan estimates that 8,900 residential units can be produced within the Inner City Area. The overall proposed development provides for a total of 162 of these units, in accordance with the objectives of the Development Plan.

For the purposes of guiding the Development Plan, both the long-term vision and the core strategy can be translated into three strongly interwoven strands:

1. *Compact, Quality, Green, Connected City*
2. *A Prosperous, Enterprising, Creative City*
3. *Creating Sustainable Neighbourhoods and Communities*

Delivered together, these priorities represent an integrated and holistic approach to the delivery of essential infrastructure and services within an over-arching sustainable framework. The core strategy supports the long-term vision for the city and will act as an important stepping-stone towards realising that longer-term vision.

In relation to the housing strategy for the city, there are several policies and objectives for the delivery of housing, however there are three core principles that inform and guide the overall core strategy which are as follows:

1. *To ensure the provision of good quality housing across owner-occupied and rental housing tenures in sustainable communities,*
2. *To ensure the planning and building of housing and residential space in the city contributes to sustainable and balanced development, and*

3. To ensure adequate provision of social rental housing for households unable to afford housing from their own resources.

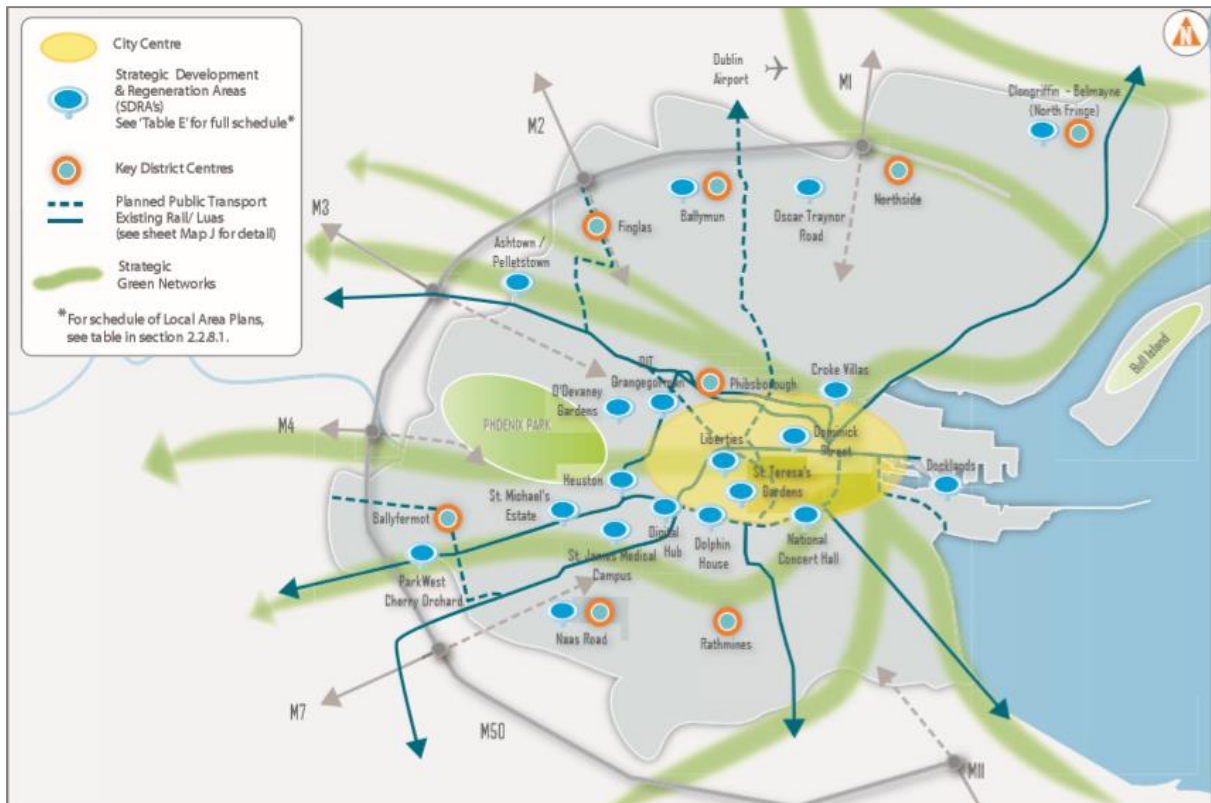


Fig. 1 – Dublin City Council Strategy Map

It is submitted that the proposed development at Prussia Street is consistent with the housing strategy as it will support the consolidation and densification of the urban built form in the area, assist in the delivery of housing of a sustainable density within the city, whilst providing a variety of units types in a vibrant community setting which will experience re-development in the coming years.

4.1.3 Quality Housing

In conjunction with the Housing Strategy, the Quality Housing chapter identifies the minimum standards required by Dublin City Council in relation to housing supply in the city area. At a general level, the development plan states *“the Department of Housing, Planning, Community and Local Government Planning Policy Statement 2015 encourages planning authorities to engage in active land management by leading and managing the development process and ensuring that land zoned for development actually comes into use in accordance with development plan policy and in tandem with supporting infrastructure.”*

It continues, *“building at higher densities makes more efficient use of land and energy resources, creating a consolidated urban form which fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure”*. The proposed development at Prussia Street is consistent with these broad level policy objectives. The policy objectives include:

QH5: *“To promote residential development addressing any shortfall in housing provision through active land management and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites.”*

QH6: *“To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.”*

QH7: *“To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.”*

QH8: *“To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.”*

The Development Plan recognises the importance of building sustainable communities and on this basis, it is submitted that the proposed development at Prussia Street is consistent with these policies.

In relation to apartment living, the Development Plan states *“it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. Successful apartment living requires that the scheme must be designed as an integral part of the neighbourhood.”*

QH18: *“To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.”*

QH20: *“To ensure apartment developments on City Council sites are models of international best practice and deliver the highest quality energy efficient apartments with all the necessary infrastructure where a need is identified, to include community hubs, sports and recreational green open spaces and public parks and suitable shops contributing to the creation of attractive, sustainable, mixed-use and mixed-income neighbourhoods.”*

4.1.4 Sustainable Neighbourhoods and Communities

In terms of sustainable communities and urban design in residential developments, the Development Plan states that:

A Good Urban Neighbourhood: *“The urban neighbourhood in Dublin should be big enough to support a range of services and small enough to foster a sense of belonging and community; it should be sufficiently dense to enable all of its essential facilities to be within easy walking distance of the urban centre”*. Objectives include:

SN1: *“To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this plan.”*

Neighbourhoods and Supporting Infrastructure: *“The importance of supporting infrastructure to underpin successful neighbourhoods and sustainable communities is now a long established and central tenet of government policy”. “A range of community facilities and infrastructure will be essential to support the emergence of sustainable neighbourhoods and communities throughout the city, especially in newly emerging or developing areas”*. Development Plan policy objectives include:

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

SN6: *“To support and encourage the future growth of a wide range of public, social and community services essential to local community life, and to promote and seek to provide multi-use, fit-for-purpose community facilities which are suitable for all ages and all abilities, are operated according to an effective and efficient management strategy, and which are accessible in terms of physical design, location, cost of use, and opening hours.”*

It is submitted that the proposed development at Prussia Street is consistent with these policies and this is further detailed in the BTR Justification Report prepared by Liv Consult which is enclosed with this application. A Community and Social Infrastructure Audit has also been prepared by Downey and is submitted with this application. This audit provides detailed information and assessment on the existing infrastructure currently serving the subject site.

4.1.5 Movement and Transport

In relation to movement and transport, the Development Plan states that in order to maximise the use of public transport infrastructure and minimise car dependence, higher densities and interactive mixed uses will be encouraged within walking distance of public transport corridors and nodes (rail stations and interchanges) and at other key locations such as key district centres. Some of the policies and objectives in this regard include:

MT01: *“To encourage intensification and mixed-use development along existing and planned public transport corridors and at transport nodes where sufficient public transport capacity and accessibility exists to meet the sustainable transport requirements of the development, having regard to conservation policies set out elsewhere in this plan and the need to make best use of urban land. Dublin City Council*

will seek to prepare SDZs, LAPs or other plans for areas surrounding key transport nodes, where appropriate, in order to guide future sustainable development.”

MT2: *“Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government’s ‘Smarter Travel’ document and in the NTA’s draft transport strategy are key elements of this approach.”*

MT7: *“To improve the city’s environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with green infrastructure objectives and on foot of (inter alia) the NTA’s Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.”*

MT12: *“To improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all.”*

MT13: *“To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.”*

MT17: *“To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.”*

MT18: *“To encourage new ways of addressing the parking needs of residents (such as car clubs) to reduce the requirement for car parking.”*

MT19: *“To safeguard the residential parking component in mixed-use developments.”*

It is submitted that the proposed development at Prussia Street is consistent with these policies and objectives. The influx of population arising from the proposed development and the modal shift in transport will ensure walking and cycling are viable options for the community, with the area also very well served by existing public transport and cycling infrastructure, all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport. This is outlined further in the enclosed Traffic Assessment and Mobility Management Plan prepared by Martin Rogers Consulting Ltd.

4.1.6 Land Use Zoning

Under the Dublin City Development Plan 2016-2022, the subject site is primarily zoned ‘Objective Z1 – Sustainable Residential Neighbourhoods’ with a small section of the site (southwestern corner) zoned ‘Objective Z2 – Residential Neighbourhoods (Conservation Areas)’.

The ‘Objective Z1’ zoning seeks “to protect, provide and improve residential amenities”, and the ‘Objective Z2’ zoning seeks “to protect and/or improve the amenities of residential conservation areas.”

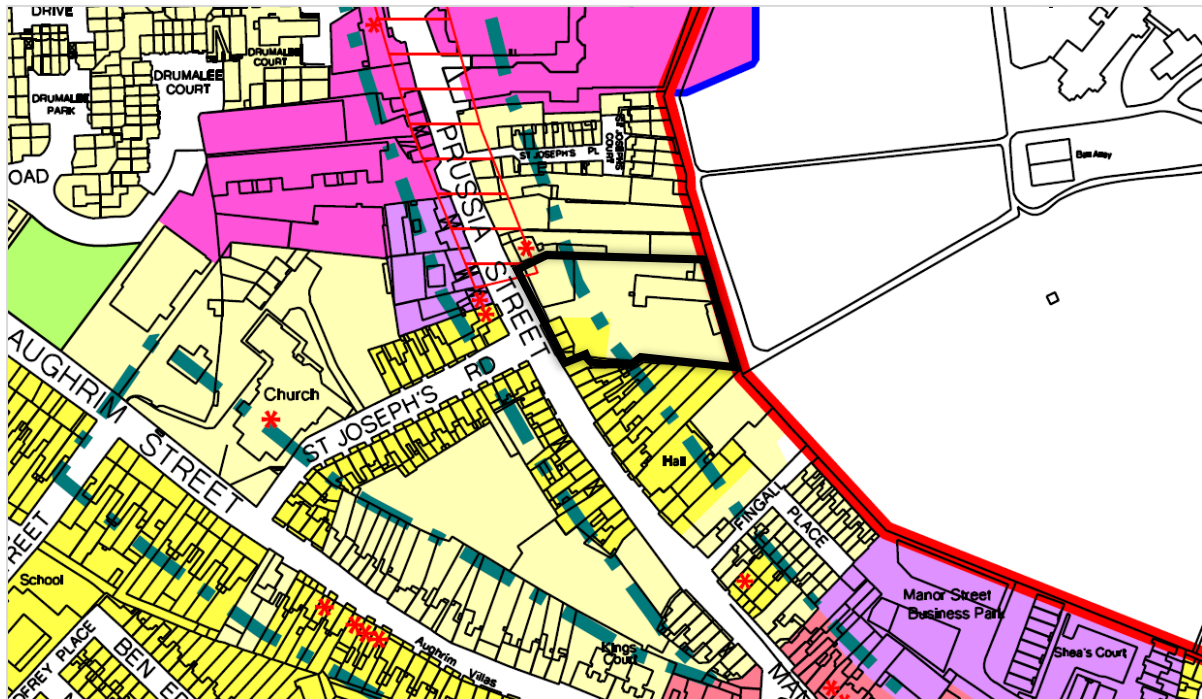


Fig. 2 – Land Use Zoning Map, site location outlined in black.

As stated in the pertaining Development Plan in relation to ‘Zoning Objective Z1’, the uses applicable to the subject lands are as follows:

*Permissible Uses: Buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, education, embassy residential, enterprise centre, halting site, homebased economic activity, medical and related consultants, open space, park-and-ride facility, place of public worship, public service installation, **residential**, shop (local), training centre.*

Open for Consideration Uses: Bed and breakfast, betting office, car park, civic and amenity/recycling centre, garden centre, golf course and clubhouse, hostel, hotel, industry (light), live/work units, media-associated uses, petrol station, pigeon lofts, public house, restaurant, veterinary surgery.

The uses applicable to the subject site under the ‘Zoning Objective Z2’ are as follows:

*Permissible Uses: Buildings for the health, safety and welfare of the public, childcare facility, embassy residential, home-based economic activity, medical and related consultants, open space, public service installation, **residential**.*

Open for Consideration Uses: Bed and breakfast, community facility, cultural/recreational building and uses, education, live-work units, place of public worship, restaurant, veterinary surgery.

The proposed development is permitted in principle under both objectives and is in accordance with the zoning objectives and the necessary social and physical infrastructure for the area.

Downey are of the professional opinion that the subject lands represent an ideal location for a residential development given the site's location within Dublin City, the existing residential environment surrounding the site, and the planned re-development of the Grangegorman area, as such the proposed development will be compatible with the established character of the surrounding area and will reinforce its function in accordance with the requirements of the zoning objectives.

4.1.7 Development Standards

Chapter 16 of the Dublin City Development Plan sets out development standards and criteria that from the policies and objectives of the City Development Plan to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

Design Principles

The Development Plan notes that all development is expected to incorporate exemplary standards of high quality sustainable and inclusive urban design and architecture which is appropriate to its context and surrounding built environment. *"In the appropriate context, imaginative contemporary architecture is encouraged, provided that it respects Dublin's heritage and local distinctiveness and enriches its city environment"*. The proposed scheme through the design, layout, proposed materials and finishes, is considered a positive contribution to Prussia Street and surrounding area given that it takes into account the existing and permitted development of the Grangegorman area due for re-development in the coming years. The Plan goes on to state that, *"in particular, development will respond creatively to and respect and enhance its context, and have regard to:*

- 1. The character of adjacent buildings, the spaces around and between them and the character and appearance of the local area and the need to provide appropriate enclosure to streets*
- 2. The character, scale and pattern of historic streets, squares, lanes, mews and passageways*
- 3. Existing materials, detailing, building lines, scale, orientation, height and massing, and plot width*
- 4. The form, character and ecological value of parks, gardens and open spaces, and*
- 5. Dublin's riverside and canal-side settings."*

As such, it is submitted that the proposed development contributes to the creation of an attractive, active and functional space, whilst promoting connectivity within the area with the pedestrian pathway proposed as part of the scheme which will link the TU Campus with Prussia Street.

Density

In terms of density, the Development Plan states that, *“sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport capacity will also be used to determine the appropriate density allowable.”*

The Development Plan also states that, *“all proposals for higher densities must demonstrate how the proposal contributes to place-making and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods.”*

In this regard, the proposed development promotes a higher density development that is situated in an inner city location and in close proximity to high-quality public transport and cycling infrastructure. The proposed development subject to this application provides for a high-density ‘Build to Rent’ scheme of 162 no. units. The subject site is located on high-frequency transport routes and is located within Dublin City and therefore has the capacity to achieve higher densities.

Building Height in a Sustainable City

Section 16.7.2 of the current Dublin City Development Plan 2016-2022, permits a building height of up to 24m within the ‘Low-rise’ category of the Inner City areas, such as where the subject site is located.

The maximum overall height of the proposed ‘Build to Rent’ development exceeds that prescribed in the Development Plan at its highest elevation, as it varies between 10.8m to c.41.3m (the tallest section of the block to the back of the development, adjacent the TU Dublin Grangegorman Campus), however, it is important to note that the surrounding area is already under re-development and thus increased heights are part of the on-going transformation.

The proposed development ranges in height from three storeys (10.8m) to thirteen storeys (c.41.3m) which means that the proposed height is in excess of the Development Plan height restrictions, and as such the proposed development contravenes materially the Development Plan relating to the area.

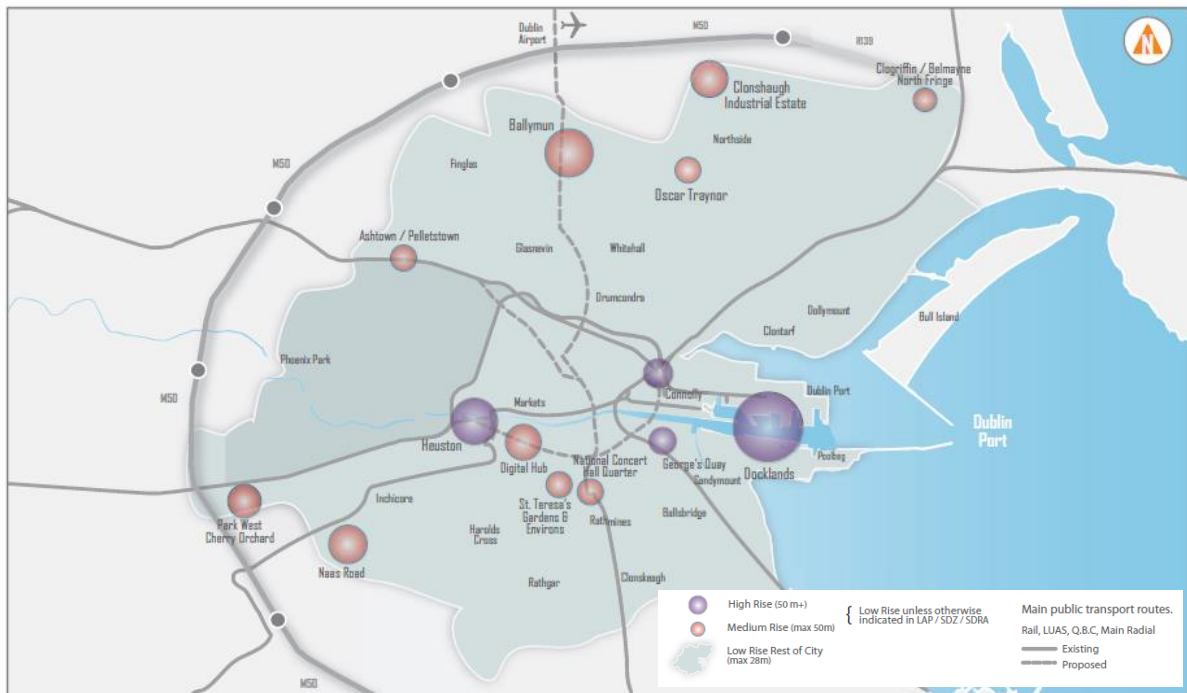


Fig. 3 – Building Height in Dublin Context (Dublin City Development Plan 2016-2022)

Category	Area	Height (m)
Low-rise (relates to the prevailing local height and context)	Inner City	Up to 28 (commercial)
		Up to 24m (residential)

Downey are of the professional opinion that given the progression of national policy, the Inner City location of the subject site, the specific context and granted permissions in the surrounding area, there is significant potential for the subject site to provide increased heights, subject to appropriate safeguards. For further details in this regard, please refer to the Material Contravention Statement prepared by Downey under a separate cover and enclosed with the application.

Making Sustainable Neighbourhoods

In relation to creating sustainable neighbourhoods, the Development Plan states the following: “new neighbourhood developments should harmonise with the local character and further develop the unique character of these places, and should also make a contribution to social infrastructure to enable the creation of sustainable neighbourhoods”. Furthermore, it states that, “proposals should have regard to the DEHLG’s Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual 2009, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DECLG’s Design Manual for Urban Streets and Roads (DMURS), 2013 in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood, as set out in the chapter on Sustainable Communities and Neighbourhoods.”

It is submitted that the proposed development will build on existing attributes within the Grangegorman and Stoneybatter area, will integrate well with the surrounding environs, and will

boost the area through the introduction of a considerable residential population by developing 162 no. high-quality designed 'Build to Rent' units with ancillary facilities and complementary uses, i.e., café, gym, co-working spaces, etc. The delivery of 162 no. units will support residential consolidation and sustainable intensification of Prussia Street to support ongoing viability of social and physical infrastructure and services within the area and meet the future housing needs of Dublin City. It is therefore considered that the proposed development is consistent with the policies and objectives of the Development Plan in this regard. Please refer to the Architectural/Urban Design Statement prepared by Downey Architecture and submitted as part of this planning application for further details in this regard.

Car and Bicycle Parking Standards

The car parking standards for the proposed development are set out within Table 16.1 of the Development Plan. However, it is important to note that car parking requirements in the '*Sustainable Urban Housing: Design Standards for New Apartments*' for shared accommodation requires minimal car parking depending on the location of the development. Under SPPR9, the Guidelines note that, "*a default policy of minimal car parking provision shall apply on the basis of shared accommodation development being more suitable for central locations and/or proximity to public transport services.*"

In this regard it is submitted that a total of 22 no. car parking spaces are provided for the proposed development at basement level, which includes 2 no. disabled parking spaces. This is considered to be sufficient to cater for the proposed development given the inner city location of the subject site and the proximity to a high-frequency bus network and extensive cycling infrastructure.

This is 14% below the maximum requirement under the Dublin City Development Plan. Thus, the overall car parking provision may be considered to potentially materially contravenes the Dublin City Development Plan 2016-2022. Please also refer to the Material Contravention Statement prepared by Downey for further information in this regard.

Bicycle parking standards provide a guide on the number of required parking spaces acceptable for new developments and are set out in Table 16.2 of the Development Plan, where 1 no. bicycle space per unit is required. The proposed development will provide for 336 no. bicycle spaces in a secure and accessible location at basement level. This equates to c.2.07 no. spaces per unit allowing for visitors and staff bicycle parking also. This is considered to be sufficient to cater for the proposed scheme and in accordance with the pertaining standards.

Given the subject site's location within the inner core of Dublin City and that it is within 200 metres from Dublin Bus services and will form part of the BusConnects 'Blanchardstown to City Centre CBC', it is considered that the site is highly accessible to public transport and as such the proposed quantum of car parking and bicycle parking is considered appropriate and complies with the proper planning and sustainable development of the area. Please refer to the Traffic Assessment and Mobility Management Plan prepared by Martin Rogers Consulting Ltd for further details on the proposed car parking and bicycle parking to serve the proposed development.

Refuse Storage and Services

The proposed development provides for a refuse storage area within the basement of the proposed development, accessible to the external collector and to the residents, and are in enclosed spaces ensuring that refuse storage and bins are secured and in accordance with the standards set out in the pertaining Development Plan. Please refer to the Operational Waste Management Plan prepared by Enviroguide Consulting and included under separate cover.

Apartment Developments

The ‘Sustainable Urban Housing: Design Standards for New Apartments’ have superseded the design standards for apartments as set out in the Development Plan. The proposed development provides for 162 no. ‘Build to Rent’ units, with a number of different unit types which is considered to be appropriate for the proposed scheme and surrounding environs. The proposed floor areas are also in accordance with the Design Standards for New Apartments as set out in the enclosed Architectural/Urban Design Statement prepared by Downey Architecture. Please refer to the enclosed report for full details on the proposed development’s compliance with standards for apartment developments.

Landscaping/Open Space

Landscape design and maintenance plans will be regarded as an integral part of all development applications. Hard landscaping, materials and finishes, soft landscaping, boundary treatments, street furniture, trees, public realm, green networks, etc, all play an integral role in the creation of a strong sense of place within an urban environment. The Grangegorman area will be an attractive, vibrant urban centre for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities such as Phoenix Park, the Grangegorman grounds, and the various pocket parks within the overall surrounding environs. The subject site is therefore well served by public open space.

In apartment-type schemes, communal open space must be provided. As stated in the Development Plan, “communal open space is a critical environmental resource as a ‘breathing space’ and for meeting the amenity needs of residents. It may be in the form of accessible sheltered roof gardens, communal landscaped areas at ground level or at podium level where commercial or retail uses occupy the ground floor”. In this regard, communal open space has been provided throughout the scheme for the enjoyment of future residents. Such spaces include roof gardens and designated communal landscaped garden areas for the scheme, all of which have been provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction between spaces.

Overall, it is submitted that the landscaping design prepared for this development at Prussia Street is consistent with all of the standards and aspirations of the Development Plan regarding landscaping and open space. For further information in this regard, please refer to the enclosed landscaping plans and associated details prepared by Downey Landscape Architecture.

5.0 CONCLUSION

This Statement demonstrates that the proposed development is in compliance with relevant national, regional and local planning policy, with the exception of the Building Heights strategy for the subject site within the Dublin City Development Plan 2016-2022 which restrict building heights on the application site. The proposed development ranges in height from three storeys (10.8m) to thirteen storeys (c.41.3m) which means that the proposed height is in excess of the Development Plan height restrictions, and as such the proposed development contravenes materially the Development Plan relating to the area.

In this regard and as demonstrated above, it is considered that restricting the height of development at such a well-served location under the Dublin City Development Plan 2016-2022 is a direct contravention of National Policy which promotes increased densities at well served urban sites and discourages general blanket height standards in certain urban areas, such as the subject site. It is respectfully submitted that the justification set out above clearly demonstrates that the proposed Strategic Housing Development in Prussia Street should be considered for increased building heights due to the location of the subject site adjacent to quality public transport corridors, as well as its Inner City location and Grangegorman Campus context, and the policies and objectives set out within the Section 28 Guidelines. For further information in this regard, please refer to the Material Contravention Statement which is submitted as part of this planning application.

It is submitted that the proposed development will provide an appropriate form of development on the subject lands that are zoned for residential development, and thus permits in principle residential use. The proposed development will provide for an effective, efficient, sustainable use of what is a brownfield site in a highly accessible Inner City location which is well served by public transport.

The nature, form and extent of the proposed development has been informed and guided by pre-application consultation with the planning authority's internal departments prior to the finalisation of this planning application.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development at Prussia Street represents a high-quality Strategic Housing Development proposal which is now being submitted as part of this planning application to An Bord Pleanála.