

Planning Application Report

Largescale Residential
Development
comprising
amendments to
previous SHD consent
(ABP Ref. ABP-306569-
20, as amended by
ABP Refs. 310567-21,
311499-21 & 311507-
21).

At No. 42A Parkgate
Street, Dublin 8.

For Ruirside
Developments Ltd

OCTOBER 2023

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1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners and Development Consultants have been instructed by our client, Ruirside Developments Ltd (*“the LRD Applicant”*), Usher House, Main Street, Dundrum, Dublin D14 N7Y8, to prepare this Planning Application Report and Statement of Consistency to accompany a planning application for Large-scale Residential Development (LRD).

The LRD Planning Application seeks permission for material amendments to consented Strategic Housing Development ABP Reg. Ref. 306569-20 (SHD 1), as amended by 310567-21 (SHD 2) and Section 146B amendments approved by ABP under 311499-21 & 311507-21, at No. 42A Parkgate Street, Dublin 8.

The proposed development broadly seeks to amend the consented SHD scheme, to include a change of use and design reconfiguration of Block B2 from office use to residential use (40no. 2-bed apartments and ancillary facilities in 8 floors (tying in with 1st to 8th floor levels of Block A). It also includes a proposed change of use of ground floor restaurant unit (c.236sqm GFA) to co-working space (229sqm) and Community/Cultural Use (52sqm) in Block B1. Other sundry ancillary and associated site, structural and landscape works are proposed to accommodate this change and tie it into the consented scheme.

For a more comprehensive description of development please refer to Section 5 of this report, and to the plans and particulars that accompany this pre-planning submission.

This submission has been prepared on behalf of the Applicant by: -

- Stephen Little & Associates, Chartered Planners and Development Consultants.
- Reddy Architecture & Urbanism
- ARUP Group
- ModelWorks
- IN2 Engineering Design Partnership
- Savills Ireland Commercial & Residential Property
- ARC Architectural Consultants
- Aramark
- AWN Consulting
- Moore Group

In accordance with the statutory Regulations, we confirm that an electronic fund transfer to the sum of €15,574.40 has been made to Dublin City Council as the appropriate fee in this instance (proof of payment enclosed). The Planning Application Form and Supplementary Form 19 associated with this stage of the LRD Application Process has been completed and is also enclosed herewith. A complete list of enclosures with this application can be found at Section 10 of this Report.

We can confirm that two Section 247 Pre-Planning Consultation meetings took place with the Planning Authority, on 25 April 2022 and 18 July 2023 respectively. Additional informal pre-planning consultation took place with the Water Services Departments of the Council.

A Section 32(B) LRD meeting was held with Dublin City Council on 6 September 2023. We refer the Planning Authority to the Response to LRD Opinion Report, prepared by Stephen Little & Associates, which provides a detailed response to the items raised in the Dublin City Council Opinion.

This Planning Application Report and Statement of Consistency sets out how, in our opinion, the proposed revisions to the consented scheme complies with the proper planning and development of this site in the context of the extant SHD permission and the relevant strategic and local planning policy, as expressed primarily in the Dublin City Council Development Plan 2022-2028.

This Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants, should be read in conjunction with the plans and particulars submitted with this

application. A list of the various accompanying material is outlined in the enclosures list at the end of this Report.

1.1 Compliance with Planning Legislation

The development proposed seeks revisions to previous Strategic Housing Development consent (ABP Reg. Ref. ABP-306569-20 and ABP-310567-21, as amended also by subsequent s.146B) issued by An Bord Pleanála, at a site of approximately 0.82 hectares at No. 42A Parkgate Street, Dublin 8.

With the commencement of the **Planning and Development (Amendment) (Large-scale Residential Development) Act 2021** proposed amendments to the consented SHD scheme must be processed through the LRD application process.

The Planning and Development (Amendment) (Large-Scale Residential Development) Act', amending Section 2 of the Planning & Development (Housing) and Residential Tenancies Act 2016, defines 'large-scale residential development, *inter alia*, as.

"Large-scale residential development' means a development that includes –

(a) The development of 100 or more houses,

(b) The development of student accommodation that included 200 or more bed spaces,

(c) Both the development of 100 or more houses and of student accommodation, or

(d) Both the development of student accommodation that included 200 or more bed spaces and of houses,

Where the LRD floor space of -

(i) In the case of paragraph (a), the buildings comprising the houses,

(ii) In the case of paragraph (b), the student accommodation,

(iii) In the case of paragraph (c) and (d), the buildings comprising the houses and the student accommodation,

Is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development;"

The consented SHD scheme ABP Reg. Ref. ABP-306569-20, including Block B1 and B2 (but omitting the Block A tower building), was granted on 28 May 2020 by An Bord Pleanála, under section 9(4) of the Planning and Development (Housing) and Residential Tenancies Act 2016 for a Strategic Housing Development. The follow-up SHD consent for the Block A Tower was granted under ABP Reg. Ref. ABP-310567-21 on 4th October 2021, which also amended tie-in elements of Block B2. The consented SHD scheme was then subject of further minor sundry amendments granted by the Board under s.146B of the Act (ABP Reg. Ref. 311499-21 and ABP Reg. Ref. 311507-21 refer). See Section 2.1 below for further details.

The proposed development broadly seeks to amend the use of Block B2 of the consented SHD scheme, to include a change of use and reconfiguration of Block B2 from office use to residential use (40no. 2-bed apartments and ancillary facilities in 8 floors from (1st to 8th floor levels). It also includes a proposed change of use of ground floor restaurant unit (c.236sqm GFA) to co-working space (229sqm) and Community/Cultural Use (52sqm) in Block B1. Other sundry ancillary and associated site, structural and landscape works are proposed to accommodate this change and tie it into the consented scheme.

The consented scheme as amended would continue to comprise more than 100 residential units, amounting to not less than 70% of the overall LRD floor space. We are of the professional opinion that the consented scheme with the proposed amendments would meet the statutory definition of Large-scale Residential Development.

As the proposed development consists of amendments to permission previously granted under section 9 of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning Authority will be restricted to assessing only the proposed modifications to the consented scheme, other than in respect of environmental effects, under Section 34(3C) of the Planning and Development Act 2000 (as amended), which states:

*“3C) In determining an application for permission that relates to a development in respect of a part of which **permission has previously been granted**—*

- (a) under section 9 of the Planning and Development (Housing) and Residential Tenancies Act 2016, or*
- (b) on foot of an application in accordance with section 32A, **the planning authority concerned shall, notwithstanding section 34(2)(a), be restricted in its determination of the application, other than in respect of any assessment of the effects of the proposed development on the environment, to considering the modifications proposed by the applicant to the previously permitted development** and for the purposes of determining such an application the reference in subsection (“) to “the development concerned” shall be read as a reference to “the modifications to the previously permitted development”*

The extant SHD permission (ABP Refs. 306569-20 and 310722-21 refer) was granted under Section 9 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

LRD Consultation

The proposed amendments to the consented SHD, have been subject of preliminary pre-planning consultation with the planning authority on 25 April 2022 and 18 July 2023, under Section 247(7) of the Act.

A Section 32(B) LRD meeting also took place and a formal Opinion was issued by Dublin City Council prior to the making of this LRD application.

Planning Application Drawings

The enclosed planning application drawings have been screened by this office with for consistency with the Planning & Development Regulations 2001, as amended.

Statutory Notice

In accordance with Article 18(1)(d)(iv) of the Regulations the newspaper notice includes confirmation that the planning application is LRD and includes a web address where the application can be viewed (www.ParkgateStreetAmendments.com).

Life of Permission Sought

The proposed amendments relate to consented development permitted under An Bord Pleanála Reference Number 306569-20 (SHD 1) and 310567-21 (SHD 2), at No. 42A Parkgate Street, Dublin 8.

A 8-year permission was granted under ABP-310567-21, which physically ties residential Block A into Block B2. We therefore respectfully request that, where minded to grant the proposed amendments to the consented scheme, the planning authority would attach a planning condition linking the duration of permission to that of ABP-310567-21 (i.e. 8 years).

2 THE APPLICANT

We wish to confirm that the Applicant in this case is Ruirside Developments Ltd, the required details of which are as follows: -

Name: Ruirside Developments Ltd

Address: Usher House, Main Street, Dundrum, Dublin 14.

Telephone: 01 2164097

Email: info@charteredland.ie

Chartered Land Estate Management, of Usher House, Main Street, Dundrum, Dublin 14 is acting for the Applicant, hence their email is being used.

2.1 Ownership

The site is owned by The Davy Platform ICAV acting on behalf of its Sub-Fund Premier Sub-Fund, 49 Dawson Street, Dublin 2, who has issued a Letter of Consent, dated 8 August 2023, consenting to the Applicant to make a planning application in respect of this site. This letter is enclosed with this application.

A portion of the site is within the ownership/control of Dublin City Council, including a public footpath and open spaces located on the north and eastern site boundary. We would highlight that the red line application site boundary does not change from that of the consented scheme. The proposed revisions to the consented scheme (contained largely to the footprint of consented Block B2 and some of the adjoining consented public open space) do not encroach the Dublin City Council lands. Notwithstanding, updated letters of consent from Dublin City Council's Transportation and Parks Departments accompany the application.

3 SITE DESCRIPTION & CONTEXT

The application site is a brownfield site, last occupied by Hickey's Fabrics warehouse and main office.

This triangular shaped site measures approximately 0.82 ha. It is bounded by Parkgate Street to the north, the River Liffey to the south, the junction of Sean Heuston Bridge and Parkgate Street and a small electricity substation to the east, and the Parkgate Place office and residential development to the west.

The application site forms the eastern section of a larger former industrial site sitting between Parkgate Street and the River Liffey. The former industrial site was divided some time prior to 1940, and the western section is now occupied by the Parkgate Place 4-5 storey office and residential development.

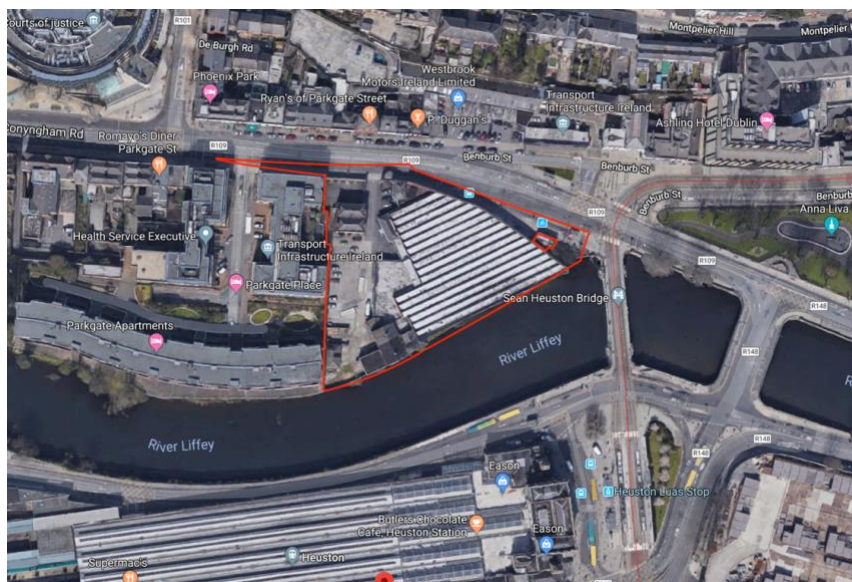


Figure 1: Application site outlined approximately in red (Source: Bing Maps, with overlays by SLA). Please refer to the enclosed Site Location Plan prepared by Reddy Architecture & Urbanism, for the definitive red line boundary of the subject site.

The application site is easily accessible on foot, being within walking distance of most of the key retail, employment and recreational amenities of the city centre. The site is close to various healthcare and third level education campuses, including St. Patricks University Hospital, St. James' Hospital and TU Grangegorman. The area is also well served by legal and administrative services, with the new Criminal

Court, the Four Courts and Dublin City Council Civic Offices all a short distance away. We refer to the Section 6.1.4 of this Report for further review of office use within the SDRA 7 catchment.

The site is proximate to cycle facilities along the quays and to a number of Dublin Bike Stations. The site is within walking distance of a number of significant public transportation services, including Heuston Station Intercity Railway Station, Heuston Red Line LUAS stop (linking to Connolly Station) and numerous Dublin bus services which operate on Parkgate Street and the City Quays (route no's 25, 25a, 25b, 26, 66, 66a, 66b, 66e, 67, 69 and 145).

The site also lies adjacent to an excellent range of cultural and recreational amenities, such as the expansive Phoenix Park and Dublin Zoo, the National Museum of Ireland at Collins Barracks, the Irish Museum of Modern Art at Kilmainham and the Guinness Storehouse to name a few.

3.1 Existing and Consented Development

3.1.1 Former Use

The Phoenix Iron Works was founded in 1808. The application site occupies the eastern half of the former ironworks site. Most of the original ironworks buildings were demolished and replaced by other buildings and structures in the mid 1880's. The site has seen a number of changes of use over time: to a woollen mills (late 1800's); shell factory / government depot (early 1900's); printers (early-mid 1900's); bookbinders / publishers (mid-late 1900's), and a textile warehouse (1970's – '00's). The western half of the original industrial site has most recently been redeveloped as a mixed use office and residential scheme.

The intended application site was last occupied by Hickey's Wholesale Fabrics warehouse and head office, for over 40 years dating back to the 1970s. The existing buildings on site total c.4,500 sqm, including the large single-storey warehouse, ancillary stores and former house/office. These buildings have fallen into disrepair and dilapidation to various degrees.

We refer to the sections below for details of the consented scheme at this site.

3.1.2 ABP Reg. Ref. 306569-20 (SHD Parent Permission)

On 28 May 2020, an Order was made by the Board confirming a split decision (ABP Ref. 306569-20 refers) in respect of the subject site, including the Block B2 office building, to:

- Grant Permission for 321no. Build-to-Rent ('BTR') residential apartments, ancillary residents' amenity facilities, **commercial office (c. 3,698sqm)**, retail (c. 214sqm) and **café/restaurant (c. 236sqm)**, accommodated in 5no. blocks ranging from 8 to 13 storeys (c. 31,146sqm) over ancillary basement area, and all associated and ancillary conservation, landscaping and site development works.
- Refuse Permission for a 29-storey 'Block A' (12,207sqm gfa), accommodating 160no. 'BTR' residential apartments, ancillary residents' amenity areas and roof gardens, 1no. café/restaurant (c. 208sqm) and ancillary plant/storage.

3.1.3 ABP Reg. Ref. 310567-21 (Block A Tower SHD and associated amendments to ABP Reg. Ref. 306569-20)

On 4 October 2021, an Order was made by the Board confirming a grant of permission, with a life of 8 years, for the redesigned 'Block A' residential tower, which forms a composite part of the overall SHD scheme. Permission was also granted for associated amendments to the originally consented scheme to integrate the revised tower building (i.e. tying it in with consented Block B2). The permitted development includes: -

- 198no. 'Build-to-Rent' residential apartments (73no. studios, 97no. 1-bed, 27no. 2-bed & 1no. 3-bed) from 1st to 27th floors inclusive, including 53no. units with 'winter garden' balconies on the Block A eastern elevation.

- Ancillary internal (c. 384sqm) and external (c. 255sqm) residents' private communal amenity areas and facilities, including ground floor reception/concierge area, lounge bars at mezzanine and 9th floors, roof gardens at 9th and 28th floors, and access to residents' private communal amenity areas within the consented scheme ABP-306569-20.
- 1no. café/restaurant (c. 236sqm) at ground floor. **Replacement office floor area (c.595.6sqm total)** accommodated between 1st and 8th floor levels of Block A.
- Ancillary residential bicycle storage (22no. spaces), refuse, circulation and plant, and non-residential back of house and circulation areas at ground and mezzanine floors.

3.1.4 ABP Reg. Ref. 311507-21. (S.146B amendments to ABP Reg. Ref. 306569-20)

On 10 June 2022, an Order was made by the Board, confirming that the consented scheme be altered in accordance with a s.146B Request (ABP Ref. 311507-21 refers). This included the reconfiguration of car parking spaces at basement and ground floor undercroft levels permitted under ABP-306569-20.

3.1.5 ABP Reg. Ref. 311499-21. (S.146B amendments to ABP Reg. Ref. 306569-20)

On 28 June 2022, an Order was made by the Board, confirming that the consented scheme be altered in accordance with a s.146B Request (ABP Ref. 311499-21 refers). This included minor changes in residential unit mix (19no. units affected), achieved through floor plan efficiencies in Blocks B1, C2 and C3 permitted under ABP-306569-20, as follows:

- 8no. permitted studio units (38sqm GFA each) change to 8no. 1-bed units (45.4sqm GFA each); at mezzanine to 7th floor levels, Block C3.
- 8no. permitted 2-bed, 3 person units (63.1sqm GFA each) change to 8no. 2-bed, 4 person units (74sqm GFA each); at mezzanine to 7th floor levels, Block C2.
- 1no. permitted 1-bed unit (63sqm GFA) changes to 1no. 2-bed, 3-person unit (63sqm GFA) at 9th floor level, Block B1.
- 1no. permitted 1-bed unit (45.1 sqm GFA) changes to 1no. studio unit (38sqm GFA) and 1no. permitted studio unit (38sqm GFA) changes to 1no. 1-bed unit (45.1sqm GFA) at 8th floor level, Block C3.

4 LRD CONSULTATION

4.1 Section 247 Consultation

The site is owned by The Davy Platform ICAV acting on behalf of its Sub-Fund Premier Sub-Fund, 49 Dawson Street, Dublin 2. A Letter of Consent, consenting to the Applicant to make a planning application in respect of this site, is enclosed with this submission.

5 LRD CONSULTATION WITH PLANNING AUTHORITY

5.1 Section 247 Consultation

An initial section 247 consultation was held on 25 April 2023 in relation to the proposed amendments to the consented scheme.

The consultation was attended by the following Council planning officers:

- Rhona Naughton, Senior Planner
- Kiaran Sweeney, Senior Executive Planner

The Planning Authority sought that further information be provided prior to the application being made, in respect of the following matters:

- In respect of compliance with the current Dublin City Development Plan 2022-2028, further clarification regarding compliance with:
 - Z5/SDRA land use mix objectives (Sections 13.9 & 14.7.5).
 - Objective CU025 community/cultural space objective.
 - Appendix 3 residential density standards.
 - Policy S123 / Appendix 11 Blue and Green Roof strategy.
- Impact on animation of Parkgate Street at ground level.
- Cumulative impact on Block A Tower design and residential amenity.
- Sunlight Daylight Assessment of the proposed units and consented Block A units and amenity open space.
- Childcare Needs Assessment.

A second section 247 LRD Pre-Application Consultation was held on 18 July 2023 in relation to the proposed amendments to the consented scheme and responses to the above issues raised.

The consultation was attended by the following planning officers of the Planning Authority:

- Kieran Sweeney, Senior Executive Planner

At this meeting, the Planning Authority expressed general satisfaction that the following items previously raised by the Planning Authority had been reasonably addressed in the prospective applicant's second s.247 submission: -

- In respect of compliance with Development Plan, the prospective applicant's further clarification regarding:
 - The lack of any specific land use ratio requirement for office or mixed use under the Z5 zoning or the SDRA land use principles for this site. That mixed use remains a feature of the consented scheme with the proposed amendment and that office use is not expressly recommended for this site within SDRA 7.
 - The density of the consented scheme already being in excess of the Appendix 3 residential density standards of the new Development Plan, and this level of density was previously considered appropriate to this landmark site context, immediately adjacent to a strategic public transport hub and within easy walking and cycling distance of City Centre amenities.
 - In respect of Policy S123 / Appendix 11 Blue and Green Roof strategy, that no design change is required to this feature of the consented scheme, as agreed with the Council's Water Services Department.
- The cumulative impact on Block A Tower design and residential amenity has been considered from a design perspective. There are no balconies on the southern façade of Block A. The façade design adjustments to proposed Block B2 are complimentary to the Block A façade design.
- The design, orientation and separation of proposed balconies in revised Block B2, relative to Block B1 reasonably protects from undue overlooking.
- Shadows cast by revised Block B2 are predominantly to the north towards Parkgate Street.
- Sunlight Daylight Assessment of the proposed units and consented Block A units and amenity open space demonstrates that they continue to meet the required standards.

At this pre-planning stage, the Planning Authority then sought that further information be provided by the prospective applicant in respect of the following matters:

- Details of the management of the communal/community spaces, whether the space would be accessible to members of the public and the functionality of the space.

- Impact on animation of Parkgate Street at ground level. Suggestion that the dual use residential amenity / co-working and the community/cultural space could be located at ground floor level to increase activity.
- Childcare Needs Assessment to be included within LRD Planning Application Pack

5.2 Section 32C LRD Meeting & Opinion

A Section 32 (C) Consultation was held on 6 September 2023 in relation to the proposed amendments to the consented scheme and responses to the above issues raised.

The consultation was attended by the following officers of the Planning Authority:

- Kieran Sweeney, Senior Planner
- Liam Currie, Senior Executive Planner
- Niamh Kiernan, Conservation Officer
- Heidi Thorsdalen SEP, Transport
- Kieran O'Neil, Parks
- Padraig Doyle, Senior Engineer, Drainage
- Shane McGlynn, Roads

At this meeting, the Planning Authority expressed general satisfaction that the following items previously raised by the Planning Authority had been reasonably addressed in the prospective applicant's second s.247 submission: -

- Density is acceptable in principle
- Zoning acceptable in principle with the Change of Use from office to residential.

The following issues were discussed during the LRD meeting:

Transport

- Demonstration that the building line does not overhang the public domain.
- Confirmation that the proposed units will have access to permitted ancillary car share spaces.
- Clarification in respect of access of the proposed units to bicycle parking.

Conservation

- Clarification on whether the applicant is in a position to reconsider the number of openings to be made into the river wall (Protected Structure). It was clarified that no new works are proposed to the protected structure as part of this application.

Drainage

- Clarification that the Surface Water Management Strategy remains as per the approved SHD.

Parks & Landscape

- Clarification that sufficient external Communal Open Space (COS) is provided to meet the increase in residential units proposed.
- Clarification that the removal of ground level restaurant does not diminish public space activation. The proposed co-working and community spaces will similarly activate the public realm. There remains a permitted ground floor restaurant/café in Block A. The proposed development will support existing active retail, pub and coffee shop uses on the north side of Parkgate Street, and will draw passers-by into the new public open space.
- Revisions required at ground level of Block B to accommodate additional cycle parking facilities.

- Provision of play for older children
- Provision of bird/bat boxes and enhance sedum species selection.

Residential Amenity

- Further clarification required to demonstrate how the co-working space activates Parkgate Street or the permitted public space, including at weekends and evenings.

We refer the Planning Authority to the enclosed Response to LRD Opinion Report which provides a response to the Dublin City Council Opinion, received on 5 October 2023, following the s.32(C) LRD meeting.

6 PARTICULARS OF THE PROPOSED DEVELOPMENT

6.1 Description of Development

The proposed development seeks amendments to consented Strategic Housing Development ABP Reg. Ref. 306569-20 (SHD 1), as amended by 310567-21 (SHD 2) and Section 146B amendments approved by ABP under 311499-21 & 311507-21, at No. 42A Parkgate Street, Dublin 8. The proposed amendments include:

- 40 no. residential apartments (30 no. 2-bed/4 person & 10 no. 2-bed/3 person units from 1st to 8th floors inclusive, each unit with private 'winter garden' and/or balcony), replacing consented office floor area (c.4,113sqm total, over 6 floors) within the Block B2 office building.
- Co-working (229sqm) and community/cultural space (52sqm) at ground floor level, replacing consented café/restaurant (c.236sqm) at Block B1.
- Reconfiguration of ancillary internal private residential communal amenity area at mezzanine level, to include residents' lobby, lounge and fitness area (c.256sqm) replacing the consented residential amenity co-working space (300sqm) at Block B2.
- And all ancillary and associated site, structural and landscape works proposed to tie amended Block B2 in with the consented development, including:
 - Design adjustments at the interface of proposed Block B2 with the consented adjoining Block A building to the east and Block B1 to the west, including tying in the 8no. new residential floors and an increase in roof parapet height (by 1.0m) of Block B2:
 - Amendments to landscaping at roof level of consented Block B2 and part of Block B1 to accommodate proposed changes to roof levels associated with Block B2 change of use.
 - Changes to the northern Parkgate Street façade of consented Block B2 to suit residential use and accommodate external private amenity (recessed wintergardens & balconies).
 - Changes to the southern internal façade of consented Block B2 to suit residential use and accommodate external private amenity (recessed balconies).
 - 20 no. additional visitor bicycle spaces and 2 no. cargo bike spaces within consented public realm at surface level.
 - Reconfiguration of internal floor plan and minor increase of consented basement/undercroft area at Block B1, from 144sqm to 164sqm, to accommodate additional ancillary residential bicycle storage (80 no. spaces)
 - Reconfiguration of ground and mezzanine floors of consented Block B1 to accommodate the proposed residential amenities and additional ancillary refuse, circulation, plant and non-residential back of house areas.
 - Removal of combined heat pump/chiller unit with associated screening on the roof of Block C.

6.2 Unit Mix

The 519no. permitted units under ABP Ref. ABP-306569-20 (Blocks B & C) and ABP-310567-21 (Block A) display a variety of apartment types. The apartments range in typology from deep plan to wide frontage comprising studio, 1 bedroom, 2 bedroom and 3-bedroom units. The following table identifies the extent of accommodation permitted within the scheme.

Studio	1-Bed	2-Bed (3Person)	2-Bed (4-Person)	3-Bed
107no. units	293no. units	5no. units	113no. units	1no. units
77%		23%		
Total number of units				519

Table 1: Permitted Residential Unit Mix - ABP-306569-20 (Blocks B & C) and ABP-310567-21 (Block A)

40no. additional units are proposed as an amendment to the consented scheme. The proposed apartments range in typology from deep plan to wide frontage comprising 2-bedroom 3-person and 2-bedroom 4-person units.

Studio	1-Bed	2-Bed (3Person)	2-Bed (4-Person)	3-Bed
0no. units	0no. units	10no. units	30no. units	0no. units
0%		100%		
Total number of units				40

Table 2: Residential Unit Mix – Proposed New Units in Block B2

In the combined permitted and proposed scheme, the mix is then as follows:

Studio	1-Bed	2-Bed (3Person)	2-Bed (4-Person)	3-Bed
107no. units	293no. units	15no. units	143no. units	1no. units
72%		28%		
Total number of units				559

6.3 Amenity Space and Landscaping

6.3.1 Public Open Space

Section 15.8.6 of the City Plan requires that all residential development is required to provide for public open space. The minimum quantum for Z5 zoned lands is 10% of the site area. It should, complement the site layout and surrounding environment, and where possible be contiguous to existing open space or natural features. It should benefit from passive surveillance, adequate daylight and sunlight penetration, and be publicly accessible for all users for the purpose of active and passive recreation.

Permitted & Proposed

There are no changes proposed to the permitted public open space, which meets the Development Plan criteria in terms of quantum and quality and will be enjoyed by the local resident, working and visiting populations.

The most significant features of the permitted public amenity open space include the 'river walk' and public plaza, connecting to Parkgate Street and the River Liffey. This amounts to **c.1,409sqm** within the site area of 0.82 ha (c.22% of the site area).

6.3.2 Community Amenity Space

Permitted

In addition to the public open space (see 7.8.4.1 above), c.2,727sqm total of external communal amenity space for prospective residents is provided within the consented scheme, including communal space at roof level of Block B1/B2. The permitted external communal open space includes soft and hard

landscaped areas at surface and roof levels, and a children's play area at surface level, all designed for safe and enjoyable use by residents.

The permitted residential units are declared 'Built to Rent', benefitting from flexibility in respect of access to external and internal communal residential amenity spaces. In addition to the external space identified above, permitted internal communal amenity space, amounting to c.1,856 sqm in total, is located at ground floor, mezzanine, 7th, 9th, 25th floors. This includes: - concierge spaces, TV rooms, a family room, lounges, bookable rooms, quiet rooms, and co-working spaces.

Proposed

The proposed 40no. residential units in Block B2 generate a requirement for 270 sq m communal amenity space. This can be absorbed within the consented external communal open space at roof level of Block B1 / B2 that amounts to c. 600 sq m. All prospective residents will also have access to the balance of the external communal amenity space (including children's play space) permitted within the overall consented scheme.

Minor alterations are proposed to the external communal amenity space at roof level of Block B1/B2 to facilitate access. These comprise level changes to accommodate the alignment of floor plates between revised Block B2 and permitted Blocks B1 and Block A, including associated steps and ramps.

All prospective residents will also have access to internal residential amenity space (c.256 sq m) at mezzanine level at Block B1/B2 (proposed to be redesignated from 'co-working' to residents' gym and lounge spaces) and to the proposed new co-working space (c.229 sq m) and cultural space (c.52 sq m) at ground floor, to be delivered via a change of use of a permitted ground floor restaurant/café unit.

We refer the Planning Authority to the Architectural Design Statement (Sections 4.7) prepared by RAU architects, and to Drawing No. 201, prepared by Mitchell + Associates Landscape Architecture, for further details.

We refer also to the Wind Analysis Report, prepared by IN2, which demonstrates that the proposed external amenity spaces perform well.

6.3.3 Private Open Space

Permitted

As the consented development comprised office space within Block B2, no private open space was provided.

Proposed

Individual balconies or winter gardens are provided to each of the proposed new apartments within Block B2, as external private amenity areas that achieve (or in some cases exceed) the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (2023).

All winter gardens can be accessed directly from the main living areas.

All winter gardens and balconies are recessed into the previously permitted footprint of Block B2 and do not overhang the public realm at Parkgate Street or within the interior of the application site.

We refer to the enclosed Housing Quality Assessment, prepared by Reddy Architecture + Urbanism for details regarding the quantum provided.

We refer the Planning Authority to the enclosed Sunlight & Daylight Assessment Report, prepared by IN2 Consulting which demonstrates that units with wintergardens perform well in terms of sunlight and daylight accessibility. We refer also to the Wind Analysis Report, prepared by IN2, which also demonstrates that the proposed balconies perform well as amenity spaces.

6.3.4 Children's Play

The consented development provides a ground level communal courtyard located between Blocks B and C, which includes a Children's Play Space of 100sqm.

It is proposed to incorporate a large chess board (12sqm) surrounded by seating and tree planting in the southwest of the residential courtyard located between Block B and Block C. The chess board is made of paving units and offers fun activity while encouraging recreation and social interaction between the residents, predominantly older children.

6.4 Site Access

There are no changes proposed to the site access as permitted.

6.5 Bicycle Parking and Access

589no. bicycle parking spaces are currently permitted within the consented scheme.

The proposed amendments deliver an additional 80no. long-term residential bicycle parking spaces at basement / undercroft.

20no. short-term visitor spaces and 2no. cargo bike spaces are provided at surface level within the public plaza.

6.6 Car Parking

The permitted development includes 26no. car parking spaces in total at surface and undercroft levels combined to cater for GoCar/Car Sharing.

No additional car parking spaces are proposed.

6.7 Water & Drainage Services

We refer the Planning Authority to the enclosed Water and Drainage Technical Statement, prepared by ARUP.

There is no change to the drainage and watermain strategy as agreed with Dublin City Council Drainage Department and Uisce Éireann required under this Block B2 planning amendment.

The water and drainage design for the consented development was ultimately approved by Uisce Éireann (formally Irish Water) by way of respective Connection Offers issued on dates between March and October 2023.

To ensure that the relevant planning documentation has taken account of the proposed revisions to the consented scheme, new Confirmation of Feasibility Statement and Statements of Design Acceptance issued by Uisce Éireann accompany this planning application.

Wastewater

Wastewater discharge from the consented scheme drains by a separate system to that of the surface water drainage system. Wastewater shall drain by gravity and discharge via 3 no. wastewater drainage outfalls to the existing sewer on the Parkgate Street, as consented under ABP-306569-20.

Wastewater discharge for the proposed residential use at Block B2 will continue to discharge through the wastewater drainage outfalls permitted as part of the consented development.

The expected wastewater loading from the proposed Block B2 change of use from office use to 40 residential units, and change of use at ground floor level of restaurant/café to co-working facility, will result in a reduced daily wastewater loading. The revised scheme is calculated to provide a net

reduction in both the overall peak discharge rate and wastewater loading of approximately 9,000 litres / day (9m³/day or a 3.7% reduction).

We refer the Planning Authority to the enclosed Water and Drainage Technical Statement, prepared by ARUP for details.

Water

The water supply for the site including the proposed changes of use at Block B remains the same as the consented development.

There is no change to the water supply arrangements and connections to the public network on Parkgate Street from what was originally agreed with Uisce Éireann.

The proposed change of use from office to residential, will result in an overall net reduction in both the daily water usage and peak flow rate of approximately 9,270 litres / day (9.27m³/day or 3.83% reduction).

We refer the Planning Authority to the enclosed Water and Drainage Technical Statement, prepared by ARUP for details.

Surface Water Drainage

The surface water management plan for the consented development was approved by Dublin City Council Drainage Division, as detailed in their reports to ABP.

Surface water run-off from the roofs of the development including Block B will discharge through the surface water drainage system and outfall drain to the River Liffey, as per the consented development.

There is no proposed change to the surface water management plan arising from the proposed change of use of Block B2 from office to residential, as agreed with Dublin City Council Drainage Division.

Pre-planning consultation with DCC Drainage Division in July 2023 clarified the proposed modifications to the Block B2 green roof needed to accommodate the changes to roof levels. There is no change to the percentage of green roof now proposed for Block B2 compared with the consented scheme, which was confirmed as acceptable by DCC Drainage Division.

We refer the Planning Authority to the enclosed Water and Drainage Technical Statement, prepared by ARUP for details.

6.8 Flood Risk

A Site-Specific Flood Risk Assessment (SSFRA) was carried out by Arup for the consented scheme in January 2020. The proposed amendments to the consented scheme do not change to the conclusions stated in the SSFRA (copy of report enclosed for reference).

We refer the Planning Authority to the enclosed Water and Drainage Technical Statement, prepared by ARUP for further confirmation.

6.9 Architectural Design

The proposed design change to Block B2 continues to follow the established historic street pattern of Parkgate Street in the same manner as the consented scheme. The overall consented built footprint, including revised Block B2, does not vary from the consented scheme.

The overall rhythm of the façade of revised Block B2 remains unchanged with the proposed change of use from office to residential.

The architectural expression emphasizes a more vertical architectural form than the office scheme. More generous areas of glazing create variety in the façade across the development and provide active

passive surveillance at Parkgate Street. The winter gardens located on the southern elevation of Block B2 provide an increased level of passive surveillance to the consented 'River Walk', increasing safety at this location.

The change of use from office to residential use replaces 6 levels of office floor plate (higher floor to ceiling height) with 8 floors of residential accommodation, largely within the same permitted building envelope. However, as the proposed Block B2 residential floors are designed to tie in with the levels of the permitted Block B1 and Block A, the overall height of Block B2 is increased by c.1m (from 31.5m to 32.5m above street level). The top floor has been set back c. 1.8m on both north and south elevations of the block, for visual relief.

Revised Block B2 sits north of the adjoining permitted blocks and so overshadowing does not arise. We refer to IN2 sunlight & daylight analysis of the impact of the proposed amendment on existing residential properties to the north, which demonstrates that no significant adverse overshadowing arises as a result of the proposed amendment to Block B2.

Wintergardens are provided for each proposed apartment units on the northern and southern elevations of revised Block B2. The consented wintergardens within Block A are located on the western elevation of that block. It is therefore considered that the proposed development will not overlook the private amenity space permitted in Block A. Separation distance and orientation of the proposed Block B2 balconies in relation to those at permitted Block B1 are such that undue overlooking is avoided.

It is not anticipated that there will be any negative architectural design effects, arising from the proposed amendment to the design of Block B2, in respect of the design integrity and amenity of permitted Block A and Block B1, or on neighbouring properties.

6.10 Daylight & Sunlight

We refer the Planning Authority to the accompanying Daylight & Sunlight Analysis, prepared by IN2 Engineering Design Partnership.

Section 4.0 states: -

*Assessment was carried out on selected units on the mezzanine and first floors to provide an understanding of the impact of any potential impact. The results determined that whilst there would be some reduction in VSC availability, the works carried out on the previously permitted scheme to ensure **good daylight availability to the units has resulted in the ADF being consistent with previous results, with every space still achieving ADF's above the BRE minimum guidance.** Due to these results for the lower floors and an understanding that daylight will improve on the upper floors, it is concluded that the **proposed amended block B2 has only negligible impact on permitted scheme.***

Thereafter, in relation to sunlight and daylight access to Block B2 and the associated residential units proposed, the report findings include: -

*Internal daylight analysis, as detailed in section 6.0, has been undertaken for all kitchen/ living/ dining (KLD) and bedroom spaces throughout the proposed amended block B2. Units have been assessed based on BRE Guide for the Spatial Daylight Autonomy (SDA) metric. **98% of the rooms, were found to be compliant for BRE recommended guideline** and detailed results are presented in Appendix A. As per Apartment Guidelines, where rooms were determined to not comply with the BRE guidelines (total 2 no. rooms), these have been identified and compensatory measures provided in Appendix A.*

*Section 7.0 included the results for the Exposure to Sunlight Analysis. This metric assesses the sunlight availability to each unit. The **proposed amended block B2 achieves a compliance rate of 80% of units exceeding the minimum recommendations.** Detailed results are included in Appendix B.*

We refer to Section 6.2 and Appendix A of the enclosed Sunlight Daylight Analysis Prepared by IN2 Engineering Design Partnership for details of compensatory design measures.

In relation to any impact on the existing neighbouring buildings, the report states: -

The analysis indicated that all existing residences on Montpelier Hill assessed for daylight impact were found to achieve full compliance with BRE recommendations, as VSC values were predicted to be either remain above 27% and or any reduction was less than 20%. These dwellings would therefore not be adversely affected by the proposed development (with amended block B2) in terms of receipt of natural light.

Similarly, analysis undertaken for sunlight availability determined BRE compliance with regards to all existing dwellings assessed on Montpelier Hill, confirming their currently received sunlight would not be adversely affected by the proposed development (with amended block B2).

7 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

7.1 National Planning Framework – Ireland 2040

The National Planning Framework (NPF) seeks to achieve the consolidation of Dublin City's development and growth within the M50 and canals to create more compact urban form. The NPF seeks 40% of all new homes to be located within the existing footprints of our urban settlements. In Dublin, development should be focused within the M50 and canal rings in order to consolidate the urban area. Development on infill and brownfield sites is seen as a key way to deliver this vision, particularly where such sites are served by high capacity public transport.

The subject site is exceptionally well placed to achieve this NPF vision. It delivers a high quality, mixed use regeneration development on a brownfield site at one of the city's key public transportation hubs.

This policy direction means encouraging more people, jobs and activity generally within our existing urban areas. It requires a change in previous development patterns which have predominately focused on 'greenfield' sites. In particular, it requires well-designed, high-quality development that can encourage more people, and generate more jobs and activity within existing cities, towns and villages.

Development must therefore meet appropriate design standards to achieve targeted levels of growth. It also requires active management of land and sites in urban areas.

The following are the key NPF Policy Objectives which support the principle of this development:

National Policy Objective 2a notes a target of half (50%) of future population and employment growth will be focussed in the existing five cities and their suburbs.

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

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

National Policy Objective 7 states apply a tailored approach to urban development that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on: Dunlin;... Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.

National Policy Objective 11 states a presumption in favour of development that encourages more people and generates more jobs and activity within existing cities, towns and villages, subject to appropriate planning standards being met and targeted growth achieved.

In NPF Chapter 4 'Making Stronger Urban Places', the following Key Objective is relevant:

National Policy Objective 13 requires that "in urban areas, planning and related standards, including in particular 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”, subject to a range of environmental and residential amenity tolerances.

In NPF Chapter 6 ‘People Homes and Communities’, the following Key Objectives are relevant:

National Policy Objective 27, that seeks to “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, that seeks to “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, that seeks to “increase residential density in settlements, through a range of measures including restrictions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”

National Policy Objective 36, that seeks to put in place Section 28 Ministerial Guidelines to improve the evidence base, effectiveness and consistency of the planning process for housing provision to meet varying housing needs at regional, metropolitan and local authority levels. For example, in reconciling future housing requirements effectively it is identified that in Dublin city, while one, two and three person households comprise 80% of all households, the housing stock is largely comprised of 3 and 4-bedroom houses.

7.1.1 Housing for All

Housing for All: A New Housing Plan for Ireland is the Government’s commitment to address the acknowledged housing crisis in this Country. In this regard, Housing for All states that:-

“The overall aim of our new housing plan for Ireland is that:

Everyone in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life. “

To achieve this, *Housing for All* provides four pathways to achieving four overarching objectives, being:-

- *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.*

Housing for All targets the provision of 33,000 new homes per year, over a five year period starting in 2021. Based upon the official statistics supplied by the CSO, the most recent 5 years on record are 2018-2022 (inclusive) where records show that there were 110,003 new dwelling completions; or approximately 22,000 new dwelling completions per year. That would amount to nearly 55,000 new dwelling completions less than that being sought under *Housing for All*; all be it over a slightly different period. The records for Q1-Q3 2023 from the CSO would suggest that the number of new completions for this year will exceed 30,000 for the first time since 2008, but is still short of Government targets.

While it is acknowledged that the Government is taking steps to enhance the delivery of new dwellings units, this will take some time to be realised. The proposed development, delivering 40no. additional dwellings to the housing rental market, ideally situated within the City Centre, will assist Government in bridging the gap between the target set and the shortfall which is happening on the ground.

The proposed development positively responds to each of the four overarching objectives of Housing for All and should be supported in principle.

7.2 Climate Action Plan 2023

CAP23 identifies that the dispersal of residential settlements, commercial zones and workplaces to peripheral areas instead of focusing on central areas and locations served by public transport, has led to an over-reliance on the private car. The Annex of Actions to CAP23 includes an action to prepare

sustainable settlement guidelines and to review planning guidelines to ensure a graduated approach in relation to the provision of car parking.

The proposed development is fully aligned to the CAP23 Annex of Actions, in proposing additional new residential units within the western edge of Dublin City Centre, where the 15 minute neighbourhood can be a reality. Additional car parking provision is not a necessary part of the proposal due to its close proximity to services, amenities and employment opportunities within easy walking or cycling distance and by nearby public transport. This will also have wider climate benefits, in reducing reliance on travel by private car.

Refer also to Section 7.1.5 of this report for discussion regarding compliance with Dublin City Development Plan climate action policies and objectives.

7.3 National Sustainable Mobility Policy/ National Mobility Policy Action Plan 2022-2025

7.3.1 Key Principles and High Level Goals

These policy documents aim to support more sustainable modal shift between now and 2030, through infrastructure and service improvements, as well as demand management and behavioural change measures. This is with a view to encouraging healthier mobility choices, relieving traffic congestion, improving urban environments and helping to tackle the climate crisis.

The Policy is guided by three key principles which are underpinned by 10 high-level goals: -

- **Safe and Green Mobility**
 1. Improve mobility safety.
 2. Decarbonise public transport.
 3. Expand availability of sustainable mobility in metropolitan areas.
 4. Expand availability of sustainable mobility in regional and rural areas.
 5. Encourage people to choose sustainable mobility over the private car.
- **People Focused Mobility**
 6. Take a whole of journey approach to mobility, promoting inclusive access for all.
 7. Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model.
 8. Promote sustainable mobility through research and citizen engagement.
- **Better Integrated Mobility**
 9. Better integrate land use and transport planning at all levels.
 10. Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.

7.3.2 Consistency of Proposed Development with National Sustainable Mobility Policy & Action Plan

The proposed amendments in combination with the consented scheme is consistent with the key principles of encouraging use of more sustainable public transport, cycling and walking, given the highly accessible site location.

It meets a number of the relevant high level goals. It is consistent with the promotion of better integrated mobility, with respect to implementing land use and transportation (9), where the proposed residential use is set within a mixed use context and easily accessible by rail, bus, cycling and walking.

It is consistent with the promotion of safe and green mobility, being part of a pedestrian priority development, connected with local services and employment opportunities within easy walking and cycling distance and adjacent to a strategic public transport hub. The consented scheme with the

proposed amendment will thus present choice of alternative, sustainable transport modes over the private car (5). High density, people focussed development in turn also supports investment in sustainable mobility infrastructure (3).

It is consistent with the promotion of people focussed mobility, where access for all and universal design principles are factored into the design of the proposed development (6 & 7).

7.4 Section 28 Ministerial Guidelines

The following Statements of Consistency sets out how the proposed development is consistent with the Section 28 Ministerial Guidelines.

7.4.1 Draft Compact Settlement Guidelines

These Draft Guidelines were published in August 2023 and are anticipated to come in to force during before the end of 2023. It is noted in the Introduction of these Draft Guidelines that:

The guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements.

In relation to Compact Growth, section 1.3.2 of the Draft Guidelines states, inter alia, that:-

*Priorities for compact growth include an emphasis on the **renewal of existing settlements, rather than continued sprawl**. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out.*

By comparison, international experience shows that sustainable and compact settlements that comprise an integrated network of well-designed and mixed-use neighbourhoods have many benefits. These neighbourhoods tend to offer improved access to services and amenities, better integration with existing infrastructure and public transport, more efficient use of land and facilitate and support a transition to lower carbon living. The term ‘15 minute city’ has been used in recent years to describe compact neighbourhoods that have a range of local services and amenities and access to public transport all within a short walk or cycle of homes (Figure 1.2 refers). This should be the overarching objective when planning for sustainable and compact settlements.

*In order to achieve compact growth we will need **to support more intensive use of existing buildings and properties, previously developed land and infill sites in the built-up areas of existing settlements**, in addition to the development of sites **in locations served by existing facilities and public transport**.*

The NPF target for infill and brownfield development recognises that there is significant capacity within all settlements to accommodate a growing economy and a growing population.

Given the location of the site at the western edge of Dublin City Centre, it is well served by mixed use development, including retail, employment and leisure uses. As identified above, we are currently falling short of the challenge set by Housing for All to deliver sufficient housing in the City.

Under Section 3.2.2.1 Cities of the Draft Guidelines, a number of key priorities for city and metropolitan growth are identified. In respect of same, the proposed development forms part of a wider consented mixed use development that will:-

Strengthen city, town and village centres

Protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality

Realise opportunities for adaptation, reuse and intensification of existing buildings and for incremental brownfield and infill development

There is a significant risk that the permitted office use of Block B2 is no longer viable. Whereas, we refer to the Savills report that accompanies this application, which evidences a strong demand for residential rental property in this area of the city. As such, the proposed development supports the realisation of the wider consented scheme, which in turn will positively address the key priorities noted above.

The proposed development will help strengthen the city centre through the introduction of a larger resident population. It supports the adaptive reuse of vacant property and the historic fabric of the city, including protected structures on site.

In respect of density, Table 3.1 of the Draft Guidelines states that:-

The city centres of Dublin and Cork, comprising the city core and surrounding neighbourhoods, are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall generally be applied in the city centres of Dublin and Cork.

The wording, referring to the general application of this density range, allows for some flexibility at sites suitable for higher density. It should be noted that the consented scheme already exceeds the 300 dph range, and this was previously considered acceptable by both Dublin City Council and An Bord Pleanála, being within a Strategic Development and Regeneration Area (SDRA7) and highly accessible by sustainable modes of transport. Given the site conditions have not changed, one would expect that a modest uplift of 40no. units, as proposed, would be similarly acceptable where no significant new adverse planning or environmental impacts are identified (e.g. visual impact, overlooking, overshadowing, heritage impacts, etc).

7.4.2 Sustainable Residential Guidelines in Urban Areas (Cities, Towns, Villages) (2009)

Chapter 5 of the Guidelines generally sets out that Planning Authorities should promote increased residential densities in appropriate locations. The objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.

The consented scheme has already achieved a net density of 633 dwellings per hectare, which Dublin City Council and An Bord Pleanála considered to be appropriate to the site context. The Board considered in its assessment of the consented scheme that the development would constitute an acceptable residential density in this urban location.

The proposed amendment to the consented scheme, represents an uplift of 40no. dwellings within an already consented scheme of 519no. dwellings. The density increase to 681 dwellings per hectare is not significantly more intensive than what is already consented. The site and design context has not changed. As demonstrated elsewhere through this report, there are no significant new planning impacts (visual, residential amenity, infrastructural, environmental, etc.) arising from the proposed amendments that suggest that the site would become overdeveloped compared to the consented scheme.

We are therefore of the opinion that the consented development with the proposed amendment remains in accordance with the Sustainable Residential Guidelines for city sites.

7.4.3 Urban Design Manual – A Best Practice Guide

The following table provides an overview of the ‘12 Design Criteria’ contained within the Urban Design Manual (2009), which are relevant to the proposed development within the context of the consented scheme. A response as to how the proposed development adheres to each of the criteria is also set out.

Criteria	Applicant’s Response
1. Context	<ul style="list-style-type: none"> This is a unique site in the city given its location which affords extensive street frontage on Parkgate street and a south facing boundary along the river Liffey. Unlike many of the other riverfront sites that have been developed in recent years or in the past this site is not cut off from the river by the traffic flow but can embrace the opportunity

	<p>this setting affords and open up this key site to residents and the wider community to enjoy private and public realm south facing open spaces overlooking Heuston Station, the river and the City.</p> <ul style="list-style-type: none"> The site is beside a major transport hub at Heuston station where the main line rail and LUAS connect and as referred to previously is in close proximity to significant established cultural amenity and leisure destinations such as the Royal Hospital Kilmainham, Kilmainham Gaol, Collins Barracks, the Phoenix park, the zoological gardens and the War Memorial Gardens at Islandbridge. Although not perceived as such, the Site is part of the city centre at Heuston Gateway. The site is also within walking distance of Smithfield, Thomas Street, the Guinness storehouse, the boatclubs at Islandbridge, the digital the hub, NCAD, and the rest of the city centre.
2. Connections	<ul style="list-style-type: none"> The application site is well served by public transport. Heuston Station is approximately 200m from the site which provides national and regional rail services, as well as LUAS services. On Parkgate Street a number of Dublin Bus routes are located which give further access across the city. There is a Dublin Bikes Station directly adjacent the site near Heuston Bridge, as well as many dedicated cycle lanes in the nearby roads that provide safe cycling for cyclists. Furthermore, the site offers pedestrians an alternative route along the riverfront as the proposed development provides active engagement to the River Liffey. The mix of consented and proposed apartment units will ensure that, in combination with the existing homes in the local area, the overall mix in the neighbourhood is conducive to maintaining a healthy, balanced community. The range of amenity spaces in the proposed development and within the context of the otherwise consented redevelopment of this site will cater for all users, presenting opportunities for physical and local community connections.
3. Inclusivity	<ul style="list-style-type: none"> The consented development, together with the proposed amendments has been designed to be inclusive for all users. It will provide level access, provide for a range of household sizes and ages and will present a opportunities for use by the residents, working and visiting communities in this area. Public open spaces and the river walk as part of the wider consented scheme will be accessible to the general public during park hours.
4. Variety	<ul style="list-style-type: none"> There is a range of apartment types provided as part of this application, including 2-bedroom (3-person) and 2-bedroom (4-person) apartment units. The range of unit sizes will typically cater for small families, young professionals or professionals who may only stay in the country for a period of time. The units are adaptable for amalgamation in the future to create larger units should the demand arise, without material impact on the façade design. The consented and proposed mix of housing will ensure that, taken together with the existing homes in the Islandbridge, Stoneybatter, Arbour Hill and Smithfield areas, the overall mix of housing in the neighbourhood is conducive to maintaining a healthy balanced community. A range of open spaces are to be provided as part of the consented development, both public and private communal, incorporating the existing features of the site such as the stone wall, turret and gable of the two stone buildings fronting onto the River Liffey, to serve the consented and proposed development and the local community.
5. Efficiency	<ul style="list-style-type: none"> All 40no. proposed dwellings will be constructed to meet the current Part L Building Regulation with regard energy efficiency.. The proximity of the site to Parkgate Street and Heuston Station and availability of public transport will increase the attractiveness of using public transport. Furthermore, the Dublin Bikes Station situated directly outside the development and the emergent network of cycle paths along Partgate Street and the City Quays will encourage cycling.

6. Distinctiveness	<ul style="list-style-type: none"> The consented development has been influenced by the site's unique riverside setting, its built heritage and pivotal gateway location within the city The consented public plaza is designed to benefit from active ground floor uses, good light and microclimate, passive surveillance and views of the river and Heuston Station.
7. Layout	<ul style="list-style-type: none"> The organization of the consented ground floor plan simulates a perimeter residential block of a city with a perforated building line to the river and continuous frontage along Parkgate Street with its mix of building use, the disaggregation of which moderates the scale and allows for a differentiated configuration of the corner termination of prospect views and its presence within Heuston Station Square. The massing, scale and grain of the built volumes transfers qualities of a diverse but coherent townscape outside and within the scheme. The overall rhythm of the façade remains unchanged with the proposed change of block B2 from office to residential use. The architectural expression emphasizes a more vertical architectural form than the office scheme with more generous areas of glazing to suit the apartment layouts and proposed winter gardens facing onto Parkgate Street.
8. Public Realm	<ul style="list-style-type: none"> The additional units proposed as part of this prospective application will benefit from the excellent, public realm created by the consented scheme. The proposed wintergarden located on the southern elevation of Block B2 provide an increased level of passive surveillance to the consented 'River Walk'. The plaza to the west of Block A comprises an important public area for residents and the public alike. Communal amenities and spaces create opportunities for social interaction and community development. The location of this site adjacent to the River Liffey and within easy walking distance of Croppies Acre, the Phoenix Park, the Royal Hospital Kilmainham, The War Memorial Gardens and Kilmainham Gaol afford exceptional amenity to future workers, residents and visitors to this site.
9. Adaptability	<ul style="list-style-type: none"> The additional apartments proposed development are designed to be adaptable, with future proofing in place to allow for potential modifications in selected areas should same be required in the future. For example, to deal with the changing property market over time the building diagram pushes out the structure of the building to the façade, opening the floorplate to lightweight subdivision of apartments. Additional mechanical services are also provided within apartments to allow for the combining of smaller units into larger ones without the disruption of the rest of the building. With simple adaptation the floorplate can be updated to suit several various configurations. By combining smaller units, the floorplates can adapt into larger family or multiple occupancy dwellings. By considering the future of the development beyond construction the proposed tower block looks to ensure the proposals can adapt to the needs of the city in an efficient and ultimately sustainable way. The apartments are designed to be energy efficient and NZEB compliant, using heating systems which are both efficient and adaptable in the future.
10. Privacy & Amenity	<ul style="list-style-type: none"> All apartments proposed have convenient access to a range of proposed and consented internal and external communal residential amenities. A significant proportion (60%) of apartments proposed enjoy dual aspect. Apartments are designed to prevent sound transmission by appropriate acoustic insulation or layout. Windows are sited to avoid close or direct views between apartments. The apartments are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.

11. Parking	<ul style="list-style-type: none"> No additional car parking is proposed, beyond what is already consented Additional secure bicycle parking and storage facilities are provided commensurate with the uplift in apartment numbers (102no. new bike parking spaces).
12. Detailed Design	<ul style="list-style-type: none"> Amenity use at ground floor level will maintain active street frontage along Parkgate Street Indoor and outdoor amenity spaces are provided for prospective residents and the public to enjoy. The design of the amenity spaces will facilitate easy and regular maintenance. The apartments will benefit from good daylight and all meet relevant standards specified under the Design Standards for New Apartments (2023)

To conclude, the consented scheme with the proposed amendment continues to comply in the same manner with the criteria set out in the Urban Design Manual. The assessment of the proposed development above and in the context of the expert reports referred to demonstrates that the proposal is consistent with the Urban Design Manual.

7.4.4 Sustainable Urban Housing: design Standards for New Apartments, Guidelines for Planning Authorities (2022)

The Guidelines contain a number of ‘*Specific Planning Policy Requirements*’ (SPPR), which seek to implement the national and regional strategic planning policies and objectives identified in previous sections of this report. These SPPRs take precedence over any contradictory policies or objectives of the Dublin City Development Plan 2022 – 2028.

Apartment Mix (SPPR 1)

Specific Planning Policy Requirement 1 of the Apartment Guidelines, states:

*“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).”*

(SLA emphasis in bold)

The proposed amendments provide 40no. additional apartment units in a mix of 1-bed, 2-bed (3-person) and 2-bed (4-person) units. No studio units are proposed and no more than 50% of the proposed units are one-bedroom.

While the Guidelines state that there shall be no minimum requirement for apartments with three or more bedrooms, this is not in conflict with the Dublin City Development Plan 2022-2028. The application site lies outside of the designated North East Inner City area where 3-bedroom dwellings are specifically promoted and required.

It is therefore respectfully submitted that the proposed development is in accordance with the requirements of Specific Planning Policy Requirement 1 and the Dublin City Development Plan.

Flexibility of Unit Mix (SPPR2)

Specific Planning Policy Requirement 2 of the Apartment Guidelines, states:

“For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha: -

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development.”*

On the basis that the proposed development in combination with the consented scheme exceeds 50 units on a site greater than 0.25Ha, the proposal allows for the provisions of *Specific Planning Policy Requirement 1* to be adhered to. We refer to the preceding section of this report for confirmation of compliance with SPPR1.

Apartment Floor Area (SPPR 3)

Specific Planning Policy Requirement 3 requires that the following minimum floor areas are achieved for apartments: -

Minimum Apartment Floor Areas:-

<i>Studio Apartment (1 person)</i>	<i>37sqm</i>
<i>1-bedroom apartment (2 persons)</i>	<i>45sqm</i>
<i>2-bedroom apartment (3 persons)</i>	<i>63sqm</i>
<i>2-bedroom apartment (4 persons)</i>	<i>73sqm</i>
<i>3-bedroom apartment (5 persons)</i>	<i>90sqm</i>

The floor areas of the proposed units are as follows:

Apartments			
Unit Type	No. of Units	GFA (m²) / Unit	Min. Size – Guidelines 2018
2 Bed Apartment (3-person)	10	67 – 81	63
2 Bed Apartment (4-person)	30	73 – 85	73
Total	40		

Table 3: Proposed floor areas

All of the proposed apartments exceed the minimum floor area requirements set out the Guidelines.

A Housing Quality Assessment (HQA), prepared by Reddy Architecture & Urbanism, enclosed with this application confirms this. The Table above highlights the difference in size of the units when compared to the minimum standards

Safeguarding Higher Standards

It is a policy requirement of the Guidelines that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).

All apartments proposed as part of this amendment application meet the floor area requirements set out in the Guidelines.

A Housing Quality Assessment (HQA), prepared by Reddy Architecture & Urbanism, enclosed with this application confirms this.

Dual Aspect (SPPR 4)

Specific Planning Policy Requirement 4 states that

“In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: -

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”

The application site may be categorised as a **Central and/or Accessible Urban Location** at the western edge of Dublin City Centre and well served by public transport. Heuston Station is approximately 200m from the site which provides national and regional rail services, as well as LUAS services. On Parkgate Street a number of Dublin Bus routes are located which give further access across the city. There is a Dublin Bikes Station directly adjacent the site near Heuston Bridge, as well as many dedicated cycle lanes in the nearby roads that provide safe cycling for cyclists.

In this central and accessible urban location, while a minimum of 33% dual aspect is required, the proposed apartments achieves 60% dual aspect.

A Housing Quality Assessment (HQA), prepared by Reddy Architecture & Urbanism, enclosed with this application confirms this. We refer also to the Architects Design Statement that illustrates how the dual aspect is achieved for each of the proposed units.

Floor to Ceiling Heights (SPPR 5)

Specific Planning Policy Requirement 5 states that:

“Ground level apartment floor to ceiling heights shall generally be a minimum of 2.7m and shall be increased, either at ground level only or in conjunction with all floors in an apartment block or building, in certain circumstances. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.”

There are no ground floor apartments proposed as part of this amendment application. SPPR 5 is therefore not relevant to this proposal.

Units per Core (SPPR 6)

Specific Planning Policy Requirement 6 states that

“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or

urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.”

We refer the Planning Authority to the enclosed architectural floor plans prepared by Reddy Architecture & Urbanism, which confirm that no more than 12 apartments per floor per core are provided for in the proposed development, and therefore the proposed development complies with SPPR 6.

Private & Communal Open Space

The following are the minimum private and communal amenity space requirements of the Guidelines that apply to the proposed apartments: -

Minimum Floor Areas for Private Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

Table 4: Minimum private and communal amenity space requirements of the Guidelines

Minimum Floor Areas for Communal Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

Table 5: Minimum private and communal amenity space requirements of the Guidelines

The consented development with the addition of the 40no. proposed apartments in Block B2 is consistent with the minimum private and communal amenity space standards of the Guidelines as follows:

Each of the proposed 40no. apartment units are provided with a private balcony/winter terrace which exceeds the minimum standards in terms of private open space provision, as demonstrated in the apartment Floor Plans and Housing Quality Assessment prepared by Reddy Architecture & Urbanism, which accompany this report.

Approximately 2,727sqm of external communal amenity space is provided within the consented scheme, including communal space at roof level of Block B immediately accessible to the proposed residential units. The permitted internal communal amenity space is located at the following locations: ground floor, mezzanine, 7th, 9th, 25th floors, consisting of: concierge spaces, TV rooms, a family room, lounges, bookable rooms, quiet rooms, and co-working spaces.

The proposed 40no. residential units in Block B2 require access to 270 sq m communal amenity open space. The prospective residents of Block B2 will have access to the external amenity area at roof level of Block B (c.600 sq m) and to the balance of the external communal amenity space (including children's play space) permitted within the consented scheme.

The Apartment Guidelines do not specify that all of the quantum of communal amenity identified in Appendix I must be external space. Managed private rental residential schemes can benefit from being able to deliver high quality, managed internal amenity spaces also. The consented scheme is declared Built-to-Rent, where flexible private and communal open space standards applied under the Apartment Guidelines at the time of grant of permission. The consented units benefit from a mix of external and

internal amenity open space, as described above. The proposed amendments to the consented scheme will deliver additional internal amenity spaces at ground level.

In respect of internal communal residential amenity, an internal amenity space co-working space is being replaced with residents' open lounge spaces, fitness suite and changing rooms. A new co-working space (c.229 sq m) is proposed at ground level to replace the permitted café/restaurant in Block B, for the benefit of prospective residents. This can also be made available for managed public use.

In addition to the above, a community/cultural space (c.52 sq m) benefitting both prospective residents and the wider local community (i.e. public use) is proposed at ground floor of revised Block B.

Also as previously identified, public open space in the form of a river walk and public square (c.22% of the site area) forms part of the consented scheme, benefitting prospective residents and the wider local community. The provision of communal open space and public open space within a central urban site is an almost unique scenario.

We refer the Planning Authority to Drawing No. 201, prepared by Mitchell + Associates Landscape Architecture and to the enclosed Floor Plans, Architectural Design Statement (Sections 4.7 & 4.8) and Housing Quality Assessment (Section 4.0), prepared by Reddy Architecture + Urbanism for further details.

Car Parking

The Guidelines set out broad proximity and accessibility considerations for higher density apartment schemes categorised as 'Central and/or Accessible Urban Locations', being sites:

- Within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions.
- Within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas).
- Within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.

The application site meets all of these criteria.

In the context of car parking provision, 'Central and/or Accessible Urban Locations', the Guidelines require that:-

"Car parking provision should be minimised, substantially reduced or wholly eliminated. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems."

In accordance with the recommendations of the Guidelines, the proposed amendment to the consented scheme does not provide any additional car parking over and above that already permitted.

Bicycle Parking

The Guidelines provide that new development proposals in central urban and public transport accessible locations, which otherwise feature appropriate reductions in car parking provision, should at the same time be comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.

Generally, 1no. dedicated bicycle space per bedroom and 1no. visitor bicycle space per 2no. units is required. We would refer also to Table 16.2 of the current Dublin City Development Plan for the Minimum Bicycle Parking rates applied to new development in the City, having had regard to the Apartment Guidelines (see Section 8 below for further discussion of Development Plan standards).

Bicycle parking should be easily accessible and provided within secure and dedicated facilities for residents and accessible, convenient locations for visitors.

As part of the proposed amendments to the consented scheme, an additional 102no. bicycle parking spaces are proposed to be provided. An additional 80no. residents' long-term, secure bicycle parking spaces are proposed at basement / undercroft. An additional 20no. visitor short-term spaces and 2no. cargo spaces are proposed at surface level.

We refer the Planning Authority to the Floor Plans and Architects Design Statement, prepared by Reddy Architecture & Urbanism, and to the Landscape Plans, prepared by Mitchell & Associates Landscape Architecture for further details on the location of the proposed additional bicycle parking facilities.

Building Life Cycle Report

Paragraph 6.13 of the Guidelines requires that planning applications for apartment development include a Building Lifecycle Report.

An updated Building Life Cycle Report, prepared by Aramark, accompanies this LRD Application.

7.4.5 Urban Development & Building Heights Guidelines for Planning Authorities (2018)

The Guidelines note that increasing prevailing building height has a critical role to play in addressing the delivery of more compact urban growth which is a key objective of the NPF. The Guidelines set out a number of Strategic Planning Policy Requirements (SPPR) which are noted as taking precedence over any conflicting policies and objectives in the Development Plans.

Section 3.1 of the Guidelines acknowledges that there is a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport links. Section 3.1 requires Planning Authority's to apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas:

- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*
- *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- *Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?*

The proposed development seeks amendments to a consented scheme. The consented scheme includes buildings of 8 to 13 storeys and a landmark tall building (Block A), that has already been determined by the planning authority and An Bord Pleanála to be consistent with the relevant criteria set out in Section 3.2 of the Building Height Guidelines.

The proposed change of use of Block B2 to residential, sees the insertion of 8no. residential floors into the general envelope of the permitted Block B2 office building. It requires the new residential floors to be tied in with the residential floors of permitted Blocks A and B1. This results in a marginal increase to the parapet height of Block B2 by c.1m (from 31.5m to 32.5m).

The marginal increase in the proposed new height of Block B2 does not significantly alter the permitted height of Block B2 or the wider consented scheme, to give rise to any new building height compliance considerations. The site location is identified in the Development Plan as being capable of sustainably accommodating taller buildings and the extant planning permission also attests to this.

We refer the Planning Authority generally to the accompanying Architectural Design Statement and elevational drawings prepared by Reddy Architecture & Urbanism for details on the proposed modification to the roof parapet height of Block B2 in the context of the consented scheme. We refer also to the addendum LVIA statement prepared by ARC to accompany this application.

7.4.6 The Planning System and Flood Risk Assessment (2009)

We refer to the enclosed Technical Note, prepared by ARUP Group, which confirms that the conclusions of the Flood Risk Assessment (FRA) prepared for the consented scheme are not altered by the proposed amendments to that scheme.

The original FRA Report concluded: -

There is no historic record of the site having flooded in the past.

While the site borders the River Liffey, flood risk to the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater and pluvial flooding is also low.

The minimum site flood defence level of the proposed development including an allowance for climate change and freeboard is 4.12mOD.

Flood risk to the buildings on site will be managed by raising ground levels to between 5.4mOD and 6.0mOD.

Access and egress routes will not be compromised during a flood event with the exception of the route to the internal river walk next to the River Liffey. This is not a primary access and egress route for the proposed development and the entrance/exit point to the building itself will be approximately 1.38m above the minimum site flood defence level.

The proposed development will also not impact on floodplain storage or conveyance.

As a small area of the existing site is within the 0.1% AEP tidal flood extent. The site is therefore classified as Flood Zone B and a Justification Test is required. Both the Plan Making and Development Management Justification elements of the Justification test have been assessed and both are deemed to be passed as part of this FRA.

7.4.7 Design Manual for Urban Roads and Streets (2013)

The stated objective of Design Manual for Urban Roads and Streets (DMURS) is to achieve better street design in urban areas. This will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant.

The proposed development does not include any material changes to the site access or pedestrian priority ground place of the consented scheme.

8 STATUTORY PLANNING CONTEXT – STATEMENT OF CONSISTENCY

8.1 Dublin City Council Development Plan 2022-2028

The Dublin City Council Development Plan 2022-2028 (hereafter referred to as the Development Plan) was adopted at a Special Council Meeting on 2 November 2022. The Plan came into effect on 14 December 2022 and is the statutory land-use plan governing the subject lands at this time.

This Statement of Consistency is understood to be intended to provide the Planning Authority with adequate comfort that the policies and objectives of the Statutory Development Plan have been duly complied with in devising the proposed amendment to the consented scheme.

8.1.1 Land Use Zoning

Under the current Development Plan, the same majority of the site remains subject to the Zoning Objective “Z5 – City Centre”. The lands in the immediate vicinity of the site are also thus zoned.

A linear strip along the river edge remains zoned for open space. The riverside amenity space of the consented scheme, within this zone, is not impacted by the proposed amendments.

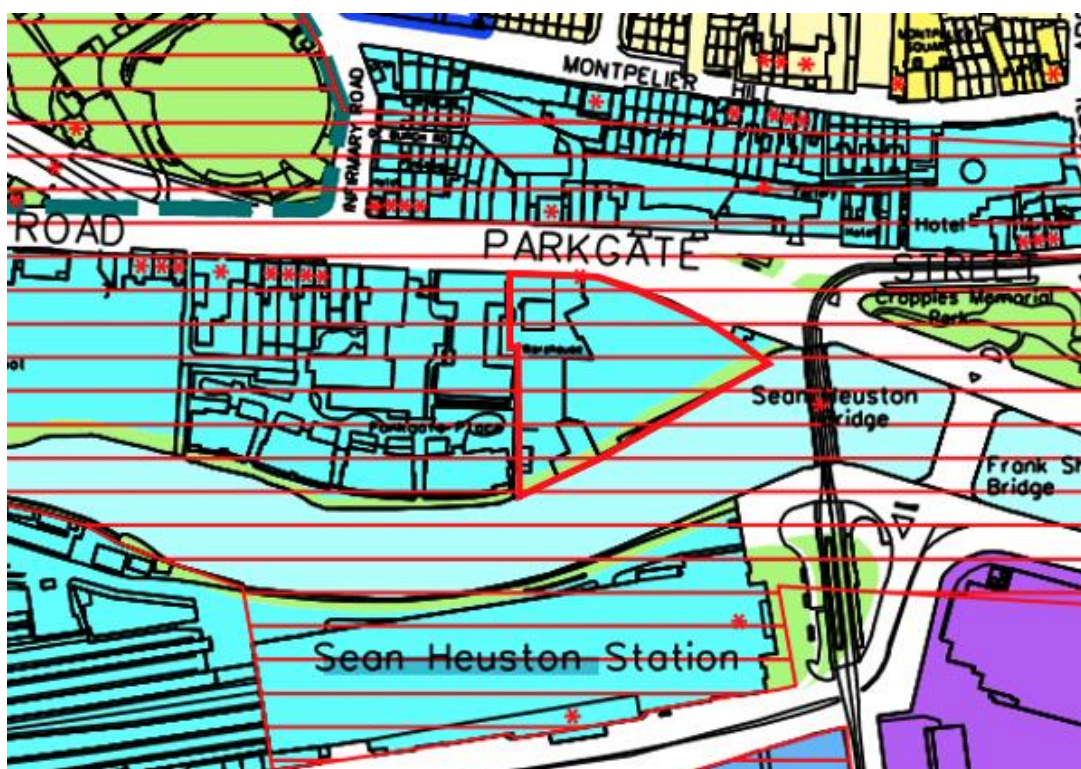


Figure 2: Extract, Map E, Dublin City Development Plan 2022 - 2028 (SLA overlay outlines approximate application site area outlined in red). We refer the Planning Authority to the accompanying Site Location Map prepared by Reddy Architecture & Urbanism for the exact extent of the site area of the consented scheme and the location of the proposed amendments within this site.

Zoning objective **Z5** seeks:

To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity.

The purpose of the zoning is to promote intensive and varied mixed-use development, horizontally and vertically, to sustain life within the city centre through day and night. The Plan identifies “*retail, commercial, residential*” as being desirable to promote within the general mix of sustainable uses.

‘Residential’ is a permissible use under the Z5 zoning.

The zoning objective does not impose any specific ratio in respect of the mix of uses to be achieved on site. It does not specifically seek to ensure that a minimum quantum of office floor area is delivered within any given scheme at Z5 lands.

We note that the An Bord Pleanála Orders and Inspectors’ Reports issued in respect of the consented scheme, permitted under 306569-20 (SHD 1) and 310567-21 (SHD 2), does not identify office use as a critical component in ensuring the sustainable mixed use development of the site.

As previously identified in the site description, the application site of the consented scheme forms the eastern section of a larger former industrial site sitting between Parkgate Street and the River Liffey. The former industrial site was divided some time prior to 1940, and the western section is now occupied by the Parkgate Place 4-5 storey office and residential development. There is other existing and planned office development in the SDRA 7 area, as described in the next section of this report.

8.1.2 Strategic Development & Regeneration Area (SDRA) 7: Heuston and Environs

The proposed change of use is located at a site within Heuston & Environs Strategic Development & Regeneration Area (SDRA 7). The SDRA 7 designation is carried over into the Dublin City Development Plan 2022-2028.

The stated “Capacity of SDRA Designated Lands for **Residential Use or a Mixture of Residential and Other Uses and Supporting Infrastructure**”, as identified in Section 13.1, Table 13.1 of the Development Plan, would appear to place a focus on the delivery of residential use as a priority over any other specific use in mixed use schemes that would deliver homes and employment in these areas of the city.

Thereafter, overarching, SDRA specific and site-specific guiding principles are set out for the SDRAs. It is stated that the guiding principles are not intended to be prescriptive and are to be read in conjunction with the land use zoning objective and other relevant policies, objectives and development standards of the Plan.

In respect of the overarching principles for development in the SDRAs in a general sense, they set out an overall strategy broadly relating to development form and scale, connectivity/permeability, open space, etc. None refer to the requirement to achieve a specific ratio of uses, or indeed to ensure the delivery specifically of office use in all new large scale development schemes within the SDRAs.

Figure 13-10 of the Development Plan indicates the development footprint and building height potential for the SDRA ‘Development Sites’, including the ‘Hickey’s’ site. It does not identify any particular type or mix of uses for this site.

The Guiding Principles for SDRA 7 Heuston and Environs, included under the theme of ‘Land Use & Activity’, do promote the creation of a new mixed-use district incorporating a mix of residential and office uses complemented by culture, retail and service elements specifically at the ‘Heuston’ lands. We would understand this to refer to ‘Key Opportunity Site’ No.3 Heuston (i.e., the CIE lands) to the south of the Liffey.

There is no similar promotion specifically of office use as part of the mix of uses promoted at the ‘Hickeys’ site (i.e. the application site), as discussed in the next section.

There is reference made in the SDRA 7 principles to Objective **CU025**, which we discuss further in Section 7.1.11 below.

Figure 13-10: SDRA 7 Heuston and Environs

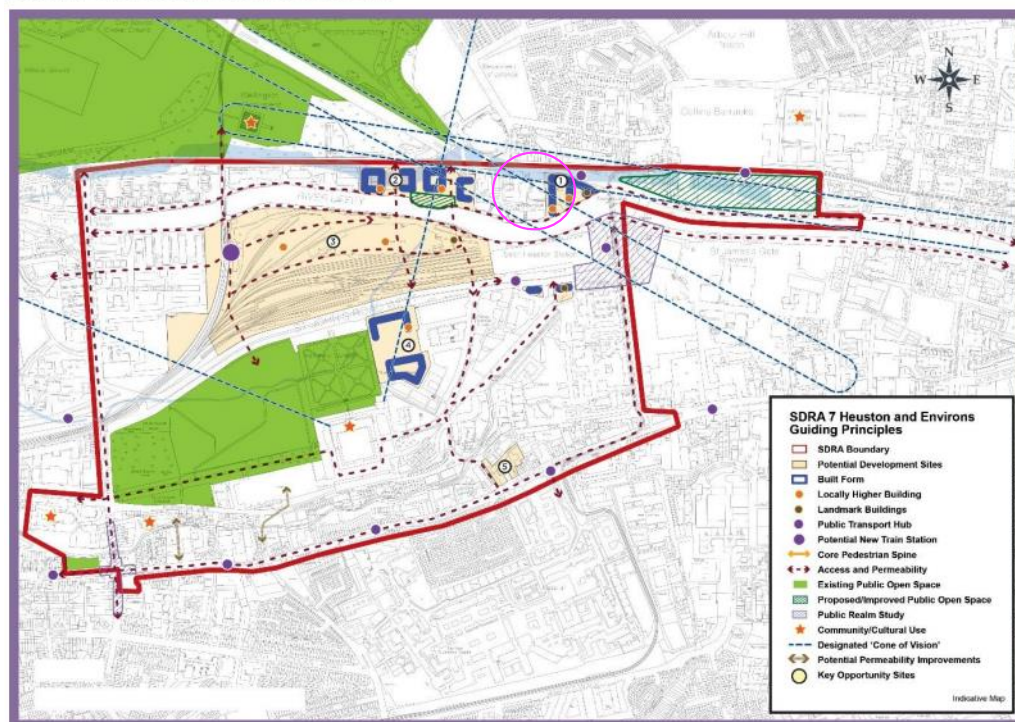


Figure 3: Extract from Figure 13-10 of the Dublin City Development Plan 2022-2028, including subject site.

8.1.3 SDRA 7 Guiding Principles for Hickey's Key Opportunity Site

In respect of the site-specific guiding principles for the 'Hickeys' lands, the intentions are:

- To provide active frontage to Parkgate Street with active non-residential land use.
- To provide a publicly accessible riverside amenity walkway.
- To allow for building heights generally in the order of 6-8 storeys, with locally higher buildings to the rear, and also a landmark building in the order of 30 storeys at the eastern apex.

These site specific guiding principles for the Hickeys site are already met by the consented scheme, with a mix of residential amenity, retail, café/restaurant uses and public amenity spaces provided at ground to animate Parkgate Street and the river walk.

The consented Block B2 Office does not have a ground floor space, but rather sits over the archway entrance to the new civic space and riverside walk. On either side there is a café/restaurant unit at ground floor of Block B1 and at ground floor of Block A.

As previously noted, there is no reference to or objective for any specific land use, land use mix or ratio applicable to SDRA 7 or the Hickey's site (i.e., the application site) under the provisions of the current Development Plan, beyond the general promotion of "**Residential Use or a Mixture of Residential and Other Uses**" within SDRA 7. The only Key Opportunity Site where promotion of office use is explicitly identified as part of mixed-use development is at Site No.3 Heuston (i.e., the CIE lands) to the south of the Liffey.

As there is no specific requirement for office use to form a component part of development proposed at the Hickey's site, we would conclude that the proposed change of use from office to residential is not in conflict with the land use objectives or development principles for the application site.

The consented scheme, with proposed amendment, will continue to provide a high quality residential scheme at upper levels, with the ground level primarily occupied by active uses, including retail, café/restaurant, public and private amenities and open space, which animate Parkgate Street and the surrounding public realm. The generous restaurant/café unit at the ground level of Block A, with active frontage to Parkgate Street and the public space, will remain as part of the consented scheme.

The proposed amendments will see the replacement of the café/restaurant uses at ground floor of Block B1 with a new co-working space (c.229 sq m) and a cultural/community space (c.52 sq m) at ground level (for use by prospective residents and with potential for public use, throughout the day and into the evening), and reorganisation of residential amenity spaces (lounge, gym, etc) at mezzanine level. These space will be used as a meeting, socialising, exercise, exhibition spaces, activating Parkgate Street and facilitating community development, without the need to make significant changes to the permitted street front elevation.

The proposed uses in combination with the other consented uses would remain a mixed-use scheme with commercial (restaurant/café, retail) and community (co-working, event spaces and amenities) at ground and mezzanine levels, and residential levels above. The combination of mixed lower floor uses and residential upper floors will serve to animate, activate and provide passive surveillance to Parkgate Street and the interior public open space and riverside walk within the site.

The amended mix of uses will complement and support the existing businesses on the north side of Parkgate Street, which include pubs, coffee shops, convenience shop, offices and the law courts, and the existing office use neighbouring the site to the west (formerly part of the original industrial site).

It is noted that permission has been recently granted for the mixed use redevelopment of the existing Guinness Brewery Lands to the south of James Street, Dublin 8. This includes 336no. dwellings, 2no. new hotels, **5 no. new commercial office buildings**, a Markethall, a Foodhall, retail/café/restaurant/public house/bar uses, community and cultural spaces and new public amenity open space. This permitted development will also significantly add to the mix of commercial uses, including office development, in the immediate vicinity of the 'Hickeys' application site and SDRA7.

It is not intended to materially amend the building height of the consented scheme. Localised roof height adjustment to Block B2 is proposed to align it with the residential floors in Blocks A and B1.)

Land Use Demand within SDRA 7

We refer to the report by Savills property agents, accompanying this application. Within SDRA 7, the report finds that:

- The ratio of residential land use to commercial office is at approximately 4.6 : 1.
- There is a higher vacancy rate within the built office stock (25%) compared to built residential stock (1%). Office vacancy in SDRA 7 is 50% greater than the vacancy rate for Dublin.
- The delivery of Block B2 as 40no. residential units instead of office floor area would cause minimal fluctuation in general land use ratios in SDRA 7.
- Office take-up within SDRA 7 (a city fringe location) is more inconsistent and lower than office take up in the CBD (>75% active office requirements are in Dublin 1, 2 & 4).
- In 2008-2009 Heuston South Quarter (HSQ) doubled the quantum of office stock in the area.
- A spike in office take-up in SDRA 7 in 2019 is attributed to the OPW development of the new Garda HQ offices at Military Road.
- The majority of office take up within SDRA 7 since 2011 has been by State bodies (70%, by HSE & OPW primarily). It is understood that at this point these bodies have largely met their current requirements for office space in this area.
- While there are other potential office developments in the planning pipeline for SDRA 7, e.g., at 17-22 Parkgate St, Heuston Station (CIE Masterplan) and HSQ Ph2, there is no guarantee that any resultant planning permissions will be implemented.
- Dublin's population is expected to expand by 18% between 2020 and 2035, yet undersupply and accumulated shortfall of residential accommodation is a persistent feature of the Irish and Dublin housing market. The shortfall for Dublin since 2011 is estimated at 50,000 dwellings.
- While delivery of PRS apartment schemes in the City remains volatile, with challenges relating to debt costs, construction inflation and planning delays, it is expected to pick up again by 2025.
- 'Older stock' PRS schemes at Clancy Quay and HSQ have been performing well, with very low vacancy rates (c.1%).
- There is a considerable lack of new residential development in the South West Inner-City area.
- The location of the application site is excellent, with immediate access to multiple transport links, the Phoenix Park and to the city centre, and would benefit from additional residential development to address the high demand for housing.

Having regard to the above findings, and given that:

- There is no specific quantum or mix of uses is prescribed in the Development Plan (under the Z5 zoning or the guiding principles for SDRA 7 or the 'Hickey's site') for SDRA 7 or the application site specifically.
- There is a higher vacancy rate at existing office stock (25% vacancy rate) within SDRA 7, compared to that in CBD Dublin postcodes 1, 2 & 4.
- There is evidence of high demand for residential managed rental accommodation (c.99% occupancy rate) within the SDRA 7 area.

The proposed change of use is considered to be sustainable, and consistent with the Council's promotion of the '15-minute city' concept of integrated land use. The site is on the western edge of the city centre where there is a wealth of retail, commercial and employment uses that support the consented and proposed residential use in this mixed-use scheme.

8.1.4 Conservation Areas

The site is located within a larger 'Conservation Area' designated in the Dublin City Development Plan along the River Liffey and its banks and quays, as evident in Figure 2.

For the avoidance of doubt, the proposed amendments to the consented scheme subject of this LRD application do not involve any new works to Protected Structures or other historic buildings / structures. These have been consented under ABP-306569-20.

The significance of the site within the designated Conservation Area along the Liffey banks and the heritage significance of the existing buildings and structures on site, and their conservation, integration or demolition as part of the consented scheme, has been established under ABP-306569-20. This permits the conservation, refurbishment, repair and adaption of existing protected structures, including:

- Entrance stone archway (protected structure) to be conserved, refurbished, repaired and adapted for use as pedestrian access to proposed residents' communal open space, entrance foyers to Block B1 and Blocks C1, C2 and C3 and ancillary amenities.
- Riverside stone wall (protected structure) to be conserved, refurbished, repaired and adapted, including partial demolition comprising the enlargement of existing opes and creation of new opes and lintel treatments for incorporation within the riverside stone wall, as part of the proposed riverside amenity walkway.
- Turret (protected structure) at the eastern end of the riverside stone wall to be conserved, refurbished, repaired and adapted as an integrated part of riverside stone wall and proposed amenity walkway.
- Square Tower on riverfront (protected structure) to be conserved, refurbished, repaired and adapted as an integrated part of riverside stone wall proposed and amenity walkway.

In respect of the other structures, that are not protected structures, ABP-306569-20 also permits:

- Conservation, refurbishment, repair and adaption of the larger of the two riverfront gabled building ('River Building') for use as gym for residents of the development, accessible from Block C1 undercroft and residents' courtyard at ground level, and incorporation of building as integrated part of riverside stone wall and proposed riverside amenity walkway.
- Conservation, refurbishment, repair and adaption of the southern façade of the smaller riverfront gabled building as part of riverside wall and incorporated with the amenity walkway. Demolition of the remainder of the building fabric.

The demolition of all other structures within the former Hickey's Fabrics site, including the large single storey warehouse building with curved wall to Parkgate Street and all warehouse internal walls and partitions including the southern brick wall running parallel to the interior of the riverside stone wall, a small two storey building adjacent to the entrance stone archway and the former 2-storey detached house (Parkgate House) at the north west corner of the site, and other miscellaneous structures, is permitted under ABP-306569-20. The Board's Inspector's Report (ABP-306569-20) welcomed the refurbishment and reuse of the Protected Structures and considered that an appropriate balance had been achieved between protecting the historical significance of the site and enabling its redevelopment.

No change to this aspect of the consented scheme arises from the proposed amendments subject of this LRD application.

We refer to the enclosed Addendum Architectural Heritage Impact Assessment, prepared by ARC Architectural Consultants Limited accompanies this Stage 3 LRD application.

8.1.5 Climate Action

The following climate action policies of the Development Plan are relevant to the design of new buildings:

CA8 (*Climate Mitigation Actions in the Built Environment*) and **CA9** (*Climate Adaption Actions in the Built Environment*) are almost identical policies, requiring that development proposals shall demonstrate:

“... sustainable [climate adaptation, circular] design principles for new buildings/services/site.

The Council will promote and support development which is resilient to climate change. This would include:

- a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;*
- b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;*
- c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);*
- d. reducing flood risk, damage to property from extreme events– residential, public and commercial;*
- e. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;*
- f. promoting and protecting biodiversity [, novel urban ecosystems] and green infrastructure.*

CA10 Climate Action Energy Statement:

“All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.”

The proposed development, as an amended building and as part of a wider consented scheme, includes a range of sustainable design principles to ensure resilience to climate change. We refer the Planning Authority to the enclosed Climate Action and Energy Statement, prepared by IN2 Engineering Partnership, for further discussion.

8.1.6 Electric Vehicles (EV)

CA24 (Electric Vehicles) is a policy of the Council:

“To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation.”

There are no changes proposed to shared car parking areas / spaces in the consented scheme.

The prospective residents of the proposed additional 40no. apartments will have access to the consented GoCar facilities.

8.1.7 Quality Housing and Sustainable Neighbourhoods

QHSN2 seeks that new residential development is:

“To have regard to the DEHLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2020), ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets’ (DMURS) (2019).”

The proposed development has had regard to the relevant Guidelines identified in QHSN2, in particular the Apartment Guidelines (2023) and Sustainable Residential Development Guidelines (2009). The consistency of the proposed amendments to the consented scheme with these Guidelines is discussed previously in Section 6.6 of this report.

QHSN10 (sustainable density) seeks:

“To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.”

The overall subject site area is approx. c.0.82 ha. 40no. additional residential units are proposed in an otherwise consented scheme including 519no. dwellings. This results in a total of 559no. dwellings in the consented and proposed development.

The overall density increases from consented 633 units per hectare to 681 units per hectare.

The consented scheme was previously considered acceptable to both Dublin City Council and An Bord Pleanála, being representative of strategic high density and high quality development of a central brownfield site, within a Strategic Development and Regeneration Area (SDRA7), highly accessible by sustainable modes of transport. The consented development was considered to be consistent with current strategic planning policy and guidance to actively promote higher density and building height at urban brownfield and infill sites. The Board was satisfied that the consented development would not give rise to any significant adverse impact on residential or visual amenity, architectural heritage or environmental infrastructure.

Given the site conditions have not changed, one would expect that a modest uplift of 40no. units, as proposed, would be similarly acceptable where no significant new adverse planning or environmental impacts are identified (e.g. visual impact, overlooking, overshadowing, heritage impacts, etc).

We refer to Section 7.1.10.2 for further discussion on the consistency of the proposed development with the Development Plan density objectives.

QHSN11 (15-minute city concept) seeks:

“To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, inter-generational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.”

The proposed amendments to the consented development continue to support the concept of a 15-minute city.

The proposed development will add 40no. new residential units and community / cultural amenities to an otherwise consented mixed use scheme. The site location benefits from a range of local city centre services and amenities within easy walking and cycling distance. The consented scheme with the proposed amendments will achieve compact growth through more intensive use of an urban brownfield site on the western edge of Dublin City Centre.

The site is highly accessible to high frequency and capacity public transport services. The site is approximately 200m from Heuston Station which gives rail access to west Dublin and the west and south west of Ireland. Heuston Red Line LUAS stop is approximately 180m from the subject site which gives convenient access to the city centre and the IFSC in one direction and access to Tallaght and west Dublin in the other direction. Numerous Dublin Bus stops are also conveniently located on Parkgate Street directly adjacent the site (Dublin Bus numbers 25, 26, 66, 66a, 66b, 66e, 67 and 69). In addition to the above public transport services, a Dublin Bikes station is located directly beside the subject site at Heuston Bridge.

QHSN011 (universal access) seeks:

“To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H’s Design Manual for Quality Housing 2022 and the DHP&LG & DH’s Housing Options for Our Ageing Population Policy Statement 2019.”

In accordance with the Apartment Design Guidelines 2023, 50% of the proposed units are in excess of the minimum floor area requirements. In accordance with QHSN011, 50% of these oversized units (i.e. 25% of the proposed apartment units) are universally designed.

We refer the Planning Authority to the enclosed Architectural Design Statement, specifically Section 4.16, prepared by Reddy Architecture + Urbanism for details.

QHSN34 (social and affordable housing) seeks:

“To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council’s Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH ‘Social Housing Strategy 2020’ and support the realisation of public housing.”

We can confirm that the site was purchased within the protected period of 1 September 2015 to 31 July 2021.

The applicant therefore intends to meet its Part V obligations by way of transfer of 10% of the proposed units to the planning authority (i.e. 4no. units, in addition to the Part V units for the consented scheme).

It is expected that the planning condition relating to Part V agreement, attached to the consent scheme, would be reattached to any future permission for the proposed amendments to that scheme.

QHSN36 (high quality apartment development) seeks:

“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.”

We refer to previous discussion of compliance with the Apartment Design Guidelines standards, in 6.6.4 of this report.

We refer also to discussion of compliance with the Development Plan design standards in 7.1.11, below, of this report.

The proposed additional units are well catered for in respect of benefitting from high levels of amenity, both within each individual apartment (generous floor areas and private balconies/ winter gardens) and in the wider private communal areas (ground and roof level courtyards and internal amenity spaces) and public amenities (public square and riverwalk) on site, and the public amenities in the immediately surrounding neighbourhood (Phoenix Park, local services, cultural attractions, etc).

We refer also to the Social and Community Audit, prepared by Stephen Little & Associates, that accompanies this report.

QHSN38 (Housing Strategy), seeks:

“To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities.”

Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.”

SC12 (Housing Mix) seeks:

“To promote a variety of housing and apartment types and sizes , as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.”

The proposed 40no. additional dwellings comprise a mix of 2-bed 3-person and 2-bed 4-person apartments, in the following ratio: -

- 25% 2-bed 3-person units
- 75% 2-bed 4-person units

This mix should be considered within the context of the wider consented scheme.

The site is not located within the Liberties or North Inner City, identified in the HDNA for the provision of a proportion of 3-bed units. Notwithstanding, in the consented scheme with proposed units, the number of 2 and 3-bed dwellings increases as a proportion of the total number of dwellings.

In the combined consented and proposed scheme, there are 15no. 2-bed 3-person units (i.e. c. 2.7% of overall units), significantly below the maximum 10% threshold of the Development Plan.

4no. of the proposed units are proposed to be transferred as Part V units.

Overall, the varied size and typology of the proposed and permitted apartment units, is appropriate to this central site and is consistent with the Development Plans objective to encourage a wide variety of dwelling types, sizes and tenures which will support the establishment of sustainable residential community.

The consented scheme with the proposed amendments enhances the passive surveillance of public and communal open space and amenities, which will encourage their use, activate the spaces and provide an effective deterrent to anti-social behaviour, allowing the prospective and existing local community to thrive.

QHSN39 (property management) seeks:

“To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.”

A Property Management Strategy Report prepared by Aramark accompanies this LRD Application.

8.1.8 Sustainable Movement and Transport

SMT1 (modal shift) seeks:

“To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.”

The proposed development in combination with the consented scheme aims to promote a modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport. No additional car parking is proposed as part of the amendments. Additional cycle parking facilities (102no. spaces) are proposed on site.

The consented scheme with the proposed amendments is well placed to support investment in and benefit from existing walking, cycle and public transport facilities.

SMT2 (electric vehicle infrastructure) seeks:

“To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.”

No change to or additional car parking spaces are proposed to the consented scheme arising from the proposed amendments.

We refer the Planning Authority to Technical Note, prepared by ARUP Group.

SMT5 (mobility hubs) seeks:

“To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.”

The consented development includes permitted shared car parking spaces, significantly below the maximum car parking thresholds of the Development Plan. No change to or additional car parking spaces are proposed to the consented scheme arising from the proposed amendments.

The site and the prospective residential, working and visiting communities will benefit from easy access by foot or by bicycle to city centre amenities and employment opportunities. It is immediately accessible (within 200m) of Heuston Station strategic public transport hub

SMT7 (travel plans) seeks:

“To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.”

We refer the Planning Authority to the enclosed Technical Note, prepared by ARUP which addresses mobility management.

SMT11 (pedestrian network) seeks:

“To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.”

The proposed development does not alter the pedestrian priority site layout of the consented scheme or how it integrates with the local pedestrian and cycle network in the public road.

The consented scheme provides for a new, publicly accessible ‘river walk’ incorporating the full length of the riverside stone wall and the turret, square tower and stone gabled buildings that contribute to the character of the existing built edge to the river and make a positive contribution to public placemaking and the cultural identity of this part of the city. The proposed amendment to the consented scheme does not alter the permitted river walk or how it is integrated with the wider public realm.

8.1.9 Sustainable Environmental Infrastructure and Flood Risk

S13: *To require all new development to provide separate foul and surface water drainage systems.*

There are no changes proposed to the permitted foul and surface water drainage systems in the consented scheme. The consented scheme provides for separate foul and surface water drainage

systems. We refer the Planning Authority to the enclosed Technical Note, prepared by ARUP for further detail.

SI14: *To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).*

The consented development complies with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and Irish Water foul sewer specification. No changes to the permitted drainage infrastructure are proposed.

SI15: *All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA)*

SI21: *To minimise flood risk arising from pluvial (surface water) flooding in the City by promoting the use of natural or nature-based flood risk management measures as a priority, by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits, and climate adaption.*

We refer the Planning Authority to the enclosed Technical Note, prepared by ARUP Group which confirms that the proposed amendment will not impact the findings of the Flood Risk Assessment previously conducted by ARUP Group which concluded: -

There is no historic record of the site having flooded in the past.

While the site borders the River Liffey, flood risk to the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater and pluvial flooding is also low.

The minimum site flood defense level of the proposed development including an allowance for climate change and freeboard is 4.12mOD.

Flood risk to the buildings on site will be managed by raising ground levels to between 5.4mOD and 6.0mOD.

Access and egress routes will not be compromised during a flood event with the exception of the route to the internal river walk next to the River Liffey. This is not a primary access and egress route for the proposed development and the entrance/exit point to the building itself will be approximately 1.38m above the minimum site flood defense level.

The proposed development will also not impact on floodplain storage or conveyance.

As a small area of the existing site is within the 0.1% AEP tidal flood extent. The site is therefore classified as Flood Zone B and a Justification Test is required. Both the Plan Making and Development Management Justification elements of the Justification test have been assessed and both are deemed to be passed as part of this FRA.

SI22: *To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, ...*

The permitted water drainage system was designed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0, the CIRIA SUDS Manual C753 2015 and Dublin City Development Plan 2016-2022.

No changes to the permitted SuDS are proposed as part of the amendments to the consented scheme. We refer the Planning Authority to the enclosed Technical Note, prepared by ARUP Group which confirms same.

SI23: *To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council's Green and Blue Roof Guide (2021) which is summarised in Appendix 11.*

The proposed amendments to the consented scheme modify the green roof to accommodate level changes at the roof of proposed Block B2. There is no change to the quantum of permitted green roof coverage.

We refer the Planning Authority to the enclosed Technical Note prepared by ARUP for further details. Arup have liaised with Dublin City Council Drainage Department who has confirmed its satisfaction that the consented surface water management strategy, with proposed modifications, is applicable.

SI29: *To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance, see Appendix 7).*

SI30: *To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).*

We refer the Planning Authority to the enclosed Operational Waste Management Plan, prepared by AWN Consulting LTD which provides detail on the additional bin stores proposed as part of this amendment.

Additionally, we refer to the enclosed floor plans, prepared by Reddy Architecture + Urbanism which provides details of the location of the proposed bin stores.

SI42: *To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.*

There are no changes proposed to the permitted public lighting scheme.

8.1.10 Green Infrastructure

GI6: *To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contributes to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development.*

GI16: *That new development should provide opportunities to incorporate biodiversity improvements through urban greening and the use of nature based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity.*

GI17: *Habitat Restoration To increase the percentage of restored and naturalised areas on public land in the city. That new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-term maintenance to limit degradation.*

There are no changes to the consented open space and river walk amenities on site. The permitted, publicly accessible 'river walk' incorporating the full length of the riverside stone wall and the turret, square tower and stone gabled buildings will contribute to the character of the existing built edge to the river and enhance local green infrastructure amenity.

GI28: *To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.*

No change is proposed to the permitted public open space provision on site. The consented scheme provides for 1,409sqm of public open space which equates to c. 22% of the site area, including a public plaza and river walk.

GI52: *To seek the provision of children’s playing facilities in new residential developments and mixed developments with a residential element. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.*

The consented development provides a ground level communal courtyard located between Blocks B and C, which includes a Children’s Play Space of 100sqm.

The Development requirement is not a pro rata standard. The consented scheme exceeded the threshold for provision. The proposed development as an integrated component of the consented scheme will benefit from the permitted play space provision.

As part of the proposed amendments to the consented scheme, a large chess board (12sqm) surrounded by seating and tree planting at the southwest of the residential courtyard is proposed to be located between Block B and Block C. The chess board is made of paving units and offers fun activity while encouraging recreation and social interaction between the residents, predominantly older children.

8.1.11 Development Standards

8.1.11.1 Plot Ratio and Site Coverage

Table 2 of Appendix 3 sets out the indicative Plot Ratio and Site Coverage for different areas as follows:

Table 2: Indicative Plot Ratio and Site Coverage

Area	Indicative Plot Ratio	Indicative Site Coverage
Central Area	2.5-3.0	80-90%
Regeneration Area	1.5-3.0	50-60%
Conservation Area	1.5-2.0	45-50%
Outer Employment and Residential Area	1.0-2.5	45-60%

Figure 4: Extract from Table 2 of Appendix 3 of the Dublin City Development Plan 2022-2028

Applicant’s Response

The site coverage and plot ratio of the consented scheme, with proposed amendments, remain as permitted at 42% and 5.1 respectively.

It was previously accepted that these are indicative and not stand alone objectives. The consented scheme, with the proposed amendments, achieves the realisation of a number of cross cutting policies and objectives relating to the sustainable, high density (re)development of underutilised, brownfield, central sites, to deliver a mix of residential and other uses, within immediate reach of city centre amenities, employment and alternative modes of transport.

8.1.11.2 Density

Table 1 of Appendix 3 sets out density ranges generally supported in the city: -

Table 1: Density Ranges

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

Figure 5: Extract from Table 1 of Appendix 3 of the Dublin City Development Plan 2022-2028

The Development Plan identifies a general presumption against schemes in excess of 300 units per hectare that can challenge successful placemaking and liveability. Schemes in excess of this density may only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented.

We refer the Planning Authority to earlier discussion in Section 6.6 of this report in respect of how the proposed development as an amendment to the consented scheme achieves sustainable density in response to strategic planning policy and guidelines.

We would reiterate that the consented scheme already exceeds 300 units per hectare. The consented scheme was considered by both An Bord Pleanála and Dublin City Council to constitute proper planning and sustainable development at this site, that is of high architectural and urban design quality (including a landmark building) and acceptable residential density (positively increasing housing stock in the city), residential and visual amenity, urban design, height and quantum of development. The proposed alterations do not change these essential attributes of the consented scheme.

With the proposed addition of 40no. residential dwellings, the overall number of units rises from 519 to 559no. dwellings on the same site of approx. 0.82Ha. The amended residential density increases correspondingly to from 633 uph to 681 uph. This increase in residential density is being achieved largely within the already permitted building envelope and footprint. As previously noted that the plot ratio and site coverage remain as per the consented development. The uplift in residential unit number also does not materially increase loading on water and drainage services or deplete community, cultural or open space facilities in the surrounding area. The proposed units do not give rise to any undue overlooking, overshadowing or dominance of existing or permitted neighbouring residential properties. No new impacts on visual or cultural amenity arise as a result of the proposed amendments.

We would respectfully submit that the original conclusions of the planning authority should not therefore change, in that the scheme as amended would remain of strategic and national importance, supporting strategic planning policy (including National Planning Framework NPO 35) to deliver compact development through increased density at a brownfield regeneration site, at a regional public transportation gateway to Dublin, in a scheme of high architectural quality and urban design.

Nonetheless, we note that Table 3 of Appendix 3 of the City Development Plan outlines criteria to be used in assessing urban schemes of enhanced density and scale. These criteria are outlined below and followed by the Applicant's response.

Objective 1- To promote development with a sense of place and character.

Enhanced density and scale should:

- *Respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,*
- *Have a positive impact on the local community and environment and contribute to 'healthy placemaking',*
- *Create a distinctive design and add to and enhance the quality design of the area,*

- *Be appropriately located in highly accessible places of greater activity and land use intensity,*
- *Have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area,*
- *Not be monolithic and should have a well-considered design response that avoids long slab blocks,*
- *Ensure that set back floors are appropriately scaled and designed.*

The proposed amendments to Block B have been carefully considered at pre-planning stage to ensure that the building remains appropriate in its relationship to the street and river edges to the site, and continues to enhance the existing townscape as a component of the wider consented scheme.

Design alterations to Block B2, include the integration of 8no. residential floors in place of 6no. office floors, within the same permitted footprint and general built envelope of Block B2. The necessary tie-in of the proposed new internal residential floor plans with adjoining Blocks A and B1, result in a minor increase in roof parapet height (by c.1.0m). The top floor has been set back c. 1.8m on both north and south elevations. There are minor amendments proposed along the north and south elevations to accommodate winter gardens for the proposed apartment units within Block B2. The permitted roof plant at Block C is also proposed to be omitted to minimise any visual clutter at roof level.

The proposed modification to the façade design of Block B2 follows the established historic street pattern of Parkgate Street, as per the consented scheme. The proposed wintergardens located on the north and south elevations provide additional active surveillance to Parkgate Street and the consented River Walk. Overall, the amended scheme remains similar in character and appearance as to that permitted on site.

The proposed amendments also include the provision of additional cultural/community space at ground floor level of Block B which will be made available to the wider public. It is envisaged that the space will be utilised for meeting, socialising, exercise, exhibition space, swap shops and community events with little change to the street front elevation. Thus, ensuring that the proposed development continues to animate and activate Parkgate Street and the interior public and communal spaces, and to positively benefit the prospective and existing local community.

We refer the Planning Authority to the accompanying Architectural Design Statement and elevational drawings prepared by Reddy Architecture & Urbanism for further architectural details.

Objective 2- To provide appropriate legibility.

Enhanced density and scale should:

- *Make a positive contribution to legibility in an area in a cohesive manner,*
- *Reflect and reinforce the role and function of streets and places and enhance permeability.*

The physical layout of the consented scheme with the proposed amendments will continue to contribute to an attractive, welcoming environment, with new linkages, public and private spaces that are well overlooked by the residential apartments and animated at ground floor level by other uses.

The consented scheme already provides high levels of site permeability through the provision of the public plaza and riverside walkway, with visual connections to other notable parts of the city, and with the potential for future onward links along the river edge.

The consented Block A landmark building enhances the legibility and navigation of the city, forging a dynamic relationship with other historic and new buildings in the area, and extending the public perception of the city centre as far as the western Heuston gateway.

Objective 3- To provide appropriate continuity and enclosure of streets and spaces.

Enhanced density and scale should:

- *Enhance the urban design context for public spaces and key thoroughfares,*

- *Provide appropriate level of enclosure to streets and spaces,*
- *Not produce canyons of excessive scale and overbearing of streets and spaces,*
- *Generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,*
- *Provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.*

As previously discussed the increased density of residential units does not significantly change the scale, massing, character or appearance of Block B or the consented scheme, or how it integrates open spaces and amenity links with the surrounding environment. The Street to Building Ratio remains as permitted.

The consented scheme, together with the proposed amendments, provides an appropriate level of enclosure to the streets and spaces. The consented scheme with proposed amendments maintains the same relationship with the permitted river walk. The proposed new Block B ground floor uses and the wintergardens and balconies located on the north and south elevations of Block B2 ensure active surveillance of the public realm and consented River Walk. Similarly, the consented scheme with the proposed amendments, provides appropriate active surveillance to Parkgate Street.

There remains a generous restaurant/café unit at the ground level of Block A, with active frontage to Parkgate Street and the public space, within the consented scheme. This will be complemented by the proposed new community space (c.52 sq m) and the co-working space (c.229 sq m) at ground floor in Block B1, all contributing towards the activation of the public realm and Parkgate Street. As noted above, the proposed wintergardens located on the north and south elevations of Block B2 provide additional active surveillance to Parkgate Street and the consented River Walk.

Objective 4- To provide well connected, high quality and active public and communal spaces

Enhanced density and scale should:

- *Integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport,*
- *Be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,*
- *Ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16,*
- *Ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development,*
- *Ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated,*
- *Provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.*

There are no changes proposed to the permitted public open space on site, which meets the Development Plan criteria in terms of quantum and quality. The most significant features of the permitted public amenity open space include the 'river walk' and public plaza, connecting to Parkgate Street and the River Liffey. This amounts to **c.1,409sqm** within the site area of 0.82 ha (c.22% of the site area). The site is immediately adjacent to the Phoenix Park, with a wealth of recreational opportunities for all ages within the local community.

The public space and external communal courtyard at ground level within the consented scheme are not proposed to be altered. Located between the consented and proposed blocks, the amenity spaces are protected and overlooked by winter gardens and balconies and active ground floor uses. The proposed wintergardens located on the north and south elevations of Block B2 provide additional active surveillance to the communal spaces and to Parkgate Street and the consented River Walk.

We refer the Planning Authority to the enclosed Sunlight & Daylight Assessment, prepared by IN2. No significant adverse sunlight or daylight impacts arising from the proposed amendment to the consented scheme, for proposed, permitted or existing neighbouring development, is predicted.

The consented scheme with the proposed amendments continues to prioritise pedestrian and cycle accessibility. No additional car parking spaces are proposed as part of this amendment. The consented car parking spaces are located at basement level, allowing for public and communal spaces within the scheme to be car free. 102no. additional bicycle parking spaces are proposed, including 20no. visitor parking spaces.

The consented scheme, together with the proposed amendments, is Part M compliant. The consented scheme with the proposed amendments makes appropriate provision for prospective residential, working and visiting population, of all abilities, to access its residential, commercial and community/cultural accommodation and open space amenities.

Objective 5- To provide high quality, attractive and useable private spaces.

Enhanced density and scale should:

- *Not compromise the provision of high quality private outdoor space,*
- *Ensure that private space is usable, safe, accessible and inviting,*
- *Ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16,*
- *Assess the microclimatic effects to mitigate and avoid negative impacts,*
- *Retain reasonable levels of overlooking and privacy in residential and mixed use development.*

Private balconies or winter gardens are provided to each of the proposed apartments within Block B2 as external amenity areas that achieve (or in some cases exceed) the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (2023). All winter gardens can be accessed directly from the main living areas.

The proposed recessed wintergardens and balconies are provided for each proposed apartment units on the northern and southern elevation of Block B2, within the already permitted building footprint. Balconies do not therefore overhang the public road or the permitted public space.

As the consented wintergardens within Block A are located on the western elevation, there will be no overlooking between the private residential amenity spaces of proposed Block B2 permitted in Block A. The proposed balconies on the southern elevation of revised Block B2 are also at sufficient separation and orientation so as not to give rise to any new overlooking impact for permitted east facing balconies on consented Block B1. As noted above, the proposed wintergardens and balconies located on the north and south elevations of Block B2 provide additional active surveillance to Parkgate Street and the consented River Walk and public and communal open spaces.

We refer the Planning Authority to the enclosed Microclimatic Wind Analysis and Pedestrian Comfort Report, prepared by IN2 for discussion of how the proposed amendments to the consented scheme, including new balconies, meet the relevant use comfort standards.

We refer the Planning Authority to the enclosed Sunlight & Daylight Assessment, prepared by IN2.

Objective 6- To promote mix of use and diversity of activities.

Enhanced density and scale should:

- *Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure,*
- *Contribute positively to the formation of a ‘sustainable urban neighbourhood’,*
- *Include a mix of building and dwelling typologies in the neighbourhood,*

- *Provide for residential development, with a range of housing typologies suited to different stages of the life cycle.*

As previously discussed under the Z5 land use zoning objective and SDRA 7 principles for this site, the consented scheme as amended would remain a mixed-use scheme, with residential, retail, café/restaurant, recreational and community/cultural amenities that will breathe new life into a highly accessible and well serviced, brownfield site. All uses of which are permissible under the Z5 zoning objective.

The proposed amendments to the consented scheme are consistent with strategic planning policy and guidelines, in the promotion of more compact mixed use urban regeneration that delivers:

- increased residential density,
- of high quality urban design and architecture,
- at an underutilised, brownfield site on the edge of the city centre,
- served by high frequency public transport connecting it with Dublin City Centre and other strategic settlements and employment zones within the Dublin Metropolitan Area.

The subject site is strategically located within the built-up footprint of Dublin's Metropolitan Area, within the western edge of the city centre. The consented scheme with the proposed amendments will deliver a high quality residential-led mixed-use development at Parkgate Street, on land zoned for a mix of uses (including residential) appropriate to maintaining the life and vitality of the city centre. The site benefits from excellent access to numerous forms of public transport, cycle and pedestrian facilities in the area. It is therefore considered that the consented development, together with the proposed amendments contribute positively to the formation of a sustainable urban neighbourhood.

The consented development with the proposed amendments will provide sustainable compact urban development, delivering an appropriate apartment mix, supported by ancillary facilities, at this prominent, underutilised brownfield site at the western gateway to the city

The permitted (519no.) and proposed (40no.) apartments together deliver a range in unit typology from deep plan to wide frontage, including studio, 1 bedroom, 2 bedroom and 3-bedroom units.

We refer the Planning Authority to the enclosed Housing Quality Assessment, prepared by Reddy Architecture + Urbanism.

We refer the Planning Authority to the enclosed Building Lifecycle Report, prepared by Aramark.

Objective 7- To ensure high quality and environmentally sustainable buildings.

Enhanced density and scale should:

- *Be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, noise and views to minimise overshadowing and loss of light – see Appendix 16,*
- *Not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain,*
- *Ensure a degree of physical building adaptability as well as internal flexibility in design and layout,*
- *Ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive,*
- *Maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,*
- *Be constructed of the highest quality materials and robust construction methodologies,*
- *Incorporate appropriate sustainable technologies, be energy efficient and climate resilient,*
- *Apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting*

of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16),

- *Incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place – see Appendix 13,*
- *Include a flood risk assessment – see SFRA Volume 7.*
- *Include an assessment of embodied energy impacts – see Section 15.7.1.*

The proposed amendments consist a change of use from office to residential in Block B2. There is no change to the permitted building footprint. The apartments have been designed to maximise dual aspect, sunlight and daylight accessibility, privacy and ventilation.

Similarly, the architectural design and internal layouts have been designed to ensure appropriate separation distances are maintained between the proposed and consented apartment units, maximising privacy to living spaces.

60% of the proposed units are dual aspect, significantly higher than the Dublin City Development Plan requirements and the requirements of the Apartment Guidelines (2023).

Sunlight and daylight analysis, and shadow study, by IN2, enclosed with the application, informed the design development to ensure appropriate environmental performance of the proposed and permitted units, and to ensure no new adverse shadowing of neighbouring residential properties arises.

It is worth highlighting that the 40no. additional apartment units proposed achieve 98% daylight compliance, 2no. non-complying rooms were identified. We refer to Appendix A of the enclosed Sunlight and Daylight Analysis, prepared by IN2 for details of compensatory measures.

The proposed new apartments, similar to the permitted units in the consented scheme, are designed to be adaptable, with future proofing in place to allow for potential internal modifications, subdivisions and amalgamations, should this be required in the future to meet the needs of a greater number of smaller or larger households over time.

The façades revised Block B, similar to the consented scheme, are articulated to create a lively/moving façade. The choice of contextual materials is as per the consented scheme, including natural stone cladding, glazed screens, brick and render to provide a modern interpretation with traditional materials. At the lower levels, quality, durable finishes shall be used in deference to the street realm to ensure a quality treatment. The architectural language is contemporary throughout the consented and revised scheme, but picks up on the grain of the area.

The proposed amendments include the omission of plant at roof level of Block C, no additional roof plant is proposed as part of this application. We therefore would consider this a planning gain.

The revised building is designed to accommodate future requirements of NZEB. Technical analysis of the various thermal and solar models create a façade that will provide thermal comfort yet achieve the required daylighting for its intended use. The target BER of the building is to be A rated. The materials are chosen to be durable, long lasting, and well detailed to cope with the Irish climate.

There is no change to the permitted drainage and watermain strategy under this Block B2 Planning Amendment as agreed with Dublin City Council Drainage Division and Uisce Éireann. Dublin City Council Drainage Division have confirmed no objection to the surface water strategy and flood risk assessment for the permitted development, as outlined in the Drainage Report to An Bord Pleanála.

We refer the Planning Authority to the enclosed Technical Report, prepared by ARUP which confirms that there is no change to the conclusions state in the Site Specific Flood Risk Assessment incorporating the proposed amendment for Block B2 change of use from office to residential.

Having regard to Section 15.7.1 of the Dublin City Development Plan, as referenced in Objective 7 of Appendix 3, Table 3, the proposed amendments do not alter the consented reuse or demolition of existing buildings/structures on site. All demolition and reuse works are as permitted under ABP-306569-20.

Objective 8- To secure sustainable density, intensity at locations of high accessibility.**Enhanced density and scale should:**

- *Be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport,*
- *Look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.*

The application site is well served by public transport. Heuston Station is approximately 200m from the site which provides national and regional rail services, as well as LUAS services. On Parkgate Street a number of Dublin Bus routes are located which give further access across the city. There is a Dublin Bikes Station directly adjacent the site near Heuston Bridge, as well as many dedicated cycle lanes in the nearby roads that provide safe cycling for cyclists.

The consented development together with the proposed amendments is designed to optimise the consented development footprint. The consented car parking is located at basement level, with access from Parkgate Street resulting in a car free public and communal spaces. Bicycle parking for residents is also located at basement level with direct access from the each Block's lobby. Visitor bicycle parking is located within the external common areas with access directly from Parkgate Street and the consented River Walk. There are no changes to the consented access points proposed. The consented development prioritises pedestrian and cyclist movements.

Objective 9- To protect historic environments from insensitive development**Enhanced density and scale should:**

- *Not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below.*
- *Be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed,*
- *Assess potential impacts on keys views and vistas related to the historic environment.*

We refer the Planning Authority to the enclosed technical addendum note to the original Architectural Heritage Impact Assessment, prepared by ARC. The original AHIA (enclosed with the application) identifies the sensitivities of the existing environment and its capacity to absorb the nature and extent of the consented scheme. The addendum note then confirms that the proposed amendments will have no new direct physical impact on surrounding heritage structures that is not already an approved part of the consented development.

We refer the Planning Authority also to the enclosed Addendum Landscape and Visual Impact Assessment, prepared by ARC.

In 2021 ARC Consultants prepared Chapter 13 Landscape and Visual Impact Assessment (LVIA) of the Environmental Impact Assessment Report (EIAR) for Block A. This LVIA assessed the likely visual impact of the 'Block A' residential tower in combination with the rest of the permitted scheme (including Block B) and of the surrounding urban landscape. This chapter formed part of the material submitted to the Board for its consideration in relation to ABP Ref. 310567-21. A total of 22 viewpoints in the surrounding area, Views A to V inclusive, were considered.

When considering the potential visual impact of the current proposed amendments to the consented scheme, it is noted that Block B is not visible in 10 of these view locations, because of intervening development, including other parts of the consented scheme.

The proposed amendments to Block B have therefore been considered in the context of the 12 view locations where Block B is likely to be visible to various degrees. New comparative photomontage views have been prepared by Model Works for each of these 12 view locations. These views show the consented scheme (including Block A) without and with the proposed amendments to Block B.

Based on these photomontage view and the planning drawings, it is ARC's assessment that **the proposed amendments will not result in any change to the previously assessed extent of potential landscape and visual effects.**

Objective 10- To ensure appropriate management and maintenance.

Enhanced density and scale should:

- *Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.*

We refer the Planning Authority to the enclosed Management Plan, prepared by Aramark.

8.1.11.3 Building Height

It is a general principle of the Development Plan to support increased height and higher density schemes in the **city centre, Strategic Development Regeneration Areas**, Key Urban Villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development.

The proposed development is located within Dublin City Centre, at the western gateway to the city centre, identified as a suitable location for higher buildings.

The application site is accessible to a range of city centre amenities and to significant employment opportunities in the city centre, at nearby hospital and third level education campuses and at the docklands. The site presents a logical western counterpoint to high density residential and mixed use development located at Dublin Docklands. The application site is already subject of consented development that includes landmark building height and high density development.

The proposed amendments to consented development deviates only marginally from the height and density of the consented scheme. The integration of 8no. proposed residential floors in place of permitted office space in Block B2, and tie in with the permitted residential floors in adjoining Blocks A and B1, results in an increase in roof parapet height of c.1m (from 31.5m to 32.5m).

The consented scheme, with the proposed amendments, remains consistent with the Building Height Guidelines (2018). It is also submitted that the marginal height increase of Block B2, within the otherwise consented scheme, remains consistent with the Dublin City Development Plan in the same manner. We refer to Section 7.1.10.3 of this report which demonstrates how the proposed development complies with Table 3 of Appendix 3 of the Dublin City Development Plan (Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale).

We refer the Planning Authority to Section 4.5 of the enclosed Architectural Design Statement, prepared by Reddy Architecture & Urbanism for detail.

8.1.11.4 Car Parking Standards

Under the Dublin City Development Plan, Table 2 of Appendix 5 sets out maximum car parking standards for various land uses as follows: -

Table 2: Maximum Car Parking Standards for Various Land Uses

Category	Land-Use	Zone 1	Zone 2	Zone 3	Category	Land-Use	Zone 1	Zone 2	Zone 3
Accommodation	Hotel ¹	None	1 per 3 rooms	1 per room	Retail and Retail Service	Café Restaurant and Takeaways	None	1 per 150sq. m. seating area	1 per 150sq. m. seating area
	Nursing Home Retirement Home	1 per 3 residents	1 per 2 residents	1 per 2 residents		Public Houses	None	1 per 300 sq. m. NFA	1 per 50 sq. m. NFA
	Elderly Persons Housing Sheltered Housing	1 per 4 dwellings	1 per 2 dwellings	1 per 2 dwellings		Club ⁵	None	1 per 10 sq. m. floor area	1 per 3 sq. m. floor area
	Student Accommodation	None ²	1 per 20 bed spaces	1 per 10 bed spaces		Retail Supermarkets exceeding 1,000sq.m. GFA	None	1 per 100 sq. m. GFA*	1 per 30 sq. m. GFA*
	Houses Apartments/ Duplexes	1 per dwelling	1 per dwelling	1 per dwelling		Other Retail and Main Street	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
Civic, Community and Religious	Bank Community Centre Library Public Institution	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA	Retail Warehousing (non-food)	1 per 300 sq. m. GFA	1 per 200 sq. m. GFA	1 per 35 sq. m. GFA	
	Place of Worship	1 per 100 seats	1 per 25 seats	1 per 10 seats	Enterprise and Employment	Offices ⁶	None ⁷	1 per 200 sq. m. GFA	1 per 100 sq. m. GFA
	Funeral Home	4 off street parking spaces	4 off street parking spaces	4 off street parking spaces		Manufacturing / Warehousing	1 per 450 sq. m. GFA	1 per 450 sq. m. GFA	1 per 200 sq. m. GFA
Education	College of Higher Education	None	1 per classroom plus 1 per 30 students	1 per classroom plus 1 per 30 students	Sports and Recreation	Clubhouse Gymnasium ⁸ Courts Pitches	Dependent on nature and location of use		
	Crèche/ Childcare Services ⁹	1 per 100sq.m. GFA	1 per 100 sq. m. GFA	1 per 100 sq. m. GFA		Venue	Auditoriums Cinema Conference Centre Stadia ⁹ Theatre	1 per 100 seats	1 per 25 seats
	School ⁴	None	1 per classroom	1 per classroom					
Medical	Clinics and Group Practices	1 per consulting room	2 per consulting room	2 per consulting room					
	Hospital	1 per 150 sq. m. GFA	1 per 100 sq. m. GFA	1 per 60 sq. m. GFA					

Figure 6: Extract from Table 2 of Appendix 5 of the Dublin City Development Plan 2022-2028

Under the City Development Plan the site is located within the Zone 1 car-parking zone. The maximum car parking provision 1 no. parking spaces to be provided per residential unit.

In accordance with these maximum standards, no additional car parking spaces are proposed as part of the amendments to the consented scheme. This is considered appropriate for a highly accessible site at the western edge of the city centre.

The prospective residents of the 40no. additional units proposed will have access to the consented car club parking facilities.

8.1.11.5 Bicycle Parking Standards

Table 1 of Appendix 5 of the Plan provides bicycle parking standards for various plan uses as follows: -

Table 1: Bicycle Parking Standards for Various Land Uses

Category	Land-Use	Zone	Long Term	Short Stay/ Visitor
Accommodation	Hotel ¹	All Zones	1 per 5 staff	To be determined by the Planning Authority on case by case basis
	Nursing Home Elderly Persons Accommodation/ Sheltered Housing	All Zones	1 per 5 staff 1 per 5 residents	1 per 10 residents
	Residential Apartment ²	All Zones	1 per bedroom	1 per two apartments
	Residential Dwelling	All Zones	1 per unit	1 per 5 dwellings
	Student Accommodation	All Zones	1 per bedroom	1 per 5 bedrooms
Civic, Community and Religious	Bank Community Centre Library Public Institution	All Zones	1 per 5 staff	1 per 100 sq. m. Gross Floor Area (GFA)
	Place of Worship	All Zones	-	1 per 20 seats
	Funeral homes	All Zones	-	To be determined by the Planning Authority on case by case basis
Education	College of Higher Education	All Zones	1 per 5 staff 1 per 2 students	
	Crèche/Childcare Services ³	All Zones	1 per 5 staff	1 per 10 children
	Primary Schools	All Zones	1 per 5 staff 1 per 5 students	
	Post Primary Schools	All Zones	1 per 5 staff 1 per 5 students	
Medical	Clinics and Group Practices	All Zones	1 per 5 staff	To be determined by the Planning Authority on case by case basis
	Hospital	All Zones	1 per 5 staff	1 per 10 beds
Retail and Retail Service	Café Restaurant	All Zones	1 per 5 staff	1 per 10 seats
	Public Houses	All Zones	1 per 5 staff	1 per 150 sq. m. GFA
	Retail	All Zones	1 per 5 staff	1 per 100 sq. m. GFA
	Retail Warehousing	All Zones	1 per 5 staff	1 per 100 sq. m. GFA
Enterprise and Employment	Offices ⁵	All Zones	1 per 75 sq. m. GFA	To be determined by the Planning Authority on case by case basis
	Manufacturing/ Warehousing	All Zones	1 per 200 sq. m.	-
	Clubhouse Gymnasium ⁶	All Zones	1 per 5 staff	1 per 50 sq. m. GFA
	Courts Pitches	All Zones	1 per 5 staff	4 per pitch or court
Venue	Auditoriums Cinema Conference Centre Theatre Stadia	All Zones	1 per 5 staff	1 per 20 seats

Figure 7: Extract from Table 1 of Appendix 5 of the Dublin City Development Plan 2022-2028

The proposed amendments to the consented scheme include an additional 102no. bicycle parking spaces (1no. long-term residential space per bedroom, 1no. short-term visitor space per two apartment units and 2no. cargo spaces), in line with the requirements of the Development Plan.

8.1.11.6 Communal Amenity Space

Regarding communal amenity space, it is noted that Section 15.9.8 of the Development Plan requires that: -

All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development.

In respect of the applicable quantum standards, the City Plan points to Section 4.10-4.12 and Appendix 1 of the Apartment Guidelines.

We would first highlight that the consented scheme is declared 'built to rent', benefitting from flexibility under the Apartment Guidelines in force at that time in respect of the provision of amenity open space. The consented apartment units benefit from a generous quantum of external and internal communal residential amenities, and from the permitted public open space amenities.

The updated Apartment Guidelines (2023) identify that well-designed and maintained communal amenity space contributes to meeting residential amenity needs, focussed on external space but not exclusively so. Appendix 1 sets out the 'minimum floor areas for communal amenity space' but does not specify that this should be exclusively external open space. The Guidelines also acknowledge that the range of residential amenities in long term, managed rental schemes (BTR) may extend to facilities such as communal leisure, gym, work spaces, concierge, lounge, welfare facilities, etc.

In the consented scheme, in addition to the public open space (22% of site area), c.2,727sqm of external communal amenity space in total is provided for prospective residents. This includes the surface level amenity courtyard area with children's play area, and communal space at roof levels of Blocks A, B1 & C. Communal open space includes soft and hard landscaped areas, all designed for safe and enjoyable use by residents.

Within the consented scheme, permitted internal communal amenity space, amounting to c.1,856 sqm in total, is located at ground floor, mezzanine, 7th, 9th, 25th floors. This includes concierge spaces, TV rooms, a family room, lounges, bookable rooms, quiet rooms, and co-working spaces.

While BTR apartment development is now subject of the same design standards set out in Section 3 of the Apartment Guidelines, this should only be applicable to the 40no. proposed units that amend the consented scheme. Section 3 of the Guidelines does not include any specific standards for communal open space. Having regard then to Section 4.12 of the Guidelines regarding communal amenity space, we would highlight that the footprint of Block B2 subject of the change of use to 40no. residential apartments is less than 0.25 ha. Where the proposed development is identified as an urban infill scheme of less than 0.25ha, it may be subject to some relaxation on communal amenity space provision on a case-by-case basis, at the discretion of the planning authority.

The proposed 40no. additional residential units in Block B generate a requirement for 270 sq m communal amenity space, in accordance with the current Guidelines and Dublin City Development Plan. This can be delivered within the consented external communal open space, amounting to 600 sq m at roof level of Block B1 and B2.

The proposed new units will also benefit from the consented communal and public open space areas, including permitted (play area) and proposed (giant chess) facilities, at ground level and from their own individual private open spaces in the form of wintergardens and/or balconies. Additional internal co-working space is proposed at ground floor of Block B, for the enjoyment of all prospective residents and that can be made available for public use.

Minor alterations are proposed to the external communal amenity space at roof level of Block B1/B2. These comprise level changes to accommodate the alignment of floor plates between Block A and Block B2 and associated inclusion of steps and ramps.

We refer the Planning Authority to the Architectural Design Statement (Sections 4.7) prepared by RAU architects, and to Drawing No. 201, prepared by Mitchell + Associates Landscape Architecture, for further details.

8.1.11.7 Play Infrastructure

Section 15.8.8 of the City Development Plan requires: -

In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.

The consented development provides a ground level communal courtyard located between Blocks B and C includes a Children's Play Space of 100sqm.

The Development requirement is not a pro rata standard. The consented scheme exceeded the threshold for provision and the proposed development, as amended, is captured within the permitted play space provision.

Notwithstanding the above, it is proposed to incorporate a large chess board (12sqm) surrounded by seating and tree planting at the south - west of the residential courtyard located between Block B and Block C. The chess board is made of paving units and offers fun activity while encouraging recreation and social interaction between the residents, predominantly older children.

It is highlighted that the river walk, public and communal amenity spaces are included within the consented scheme, as amended, suitable for use by this cohort. Thereafter, the site lies immediately adjacent to a number of existing adjacent sports, social and recreation facilities such as: -

- Phoenix Park
- The Croppies Acre Park
- Avona Boxing Club
- TU Grangegorman Playing Fields
- Arbour Hill Boxing Club
- The Royal Gardens at the Royal Hospital Kilmainham
- Irish Museum of Modern Art
- Collins Barracks
- Montpelier Play Space
- St. Brendan's GAA Club
- Bridgefoot Street Park
- St. Catherine's Sports Centre
- Marshall Art Incorporated Dublin 7
- Phoenix Park Playground
- Grangegorman Playground
- Lighthouse Cinema
- National Museum of Ireland- Decorative Arts & History
- Dublin Zoo
- Jervis Shopping Centre
- National War Memorial Gardens
- Cineworld

The consented scheme will continue to present an excellent opportunity to open up access to the River Liffey to the public, which had previously not been possible. The consented treatment of the Z9 area implements the zoning objective to provide recreational amenity and open space, while addressing the heritage value of the structures in this location. The proposed new residential units, as a composite element of the overall consented scheme, will benefit from the integration of the site's redevelopment with the restoration of the protected and other historic structures on site, as consented under ABP-306569-20, enhancing the cultural fabric of the area.

8.1.12 Culture

Objective CU025 is a new objective in the Development Plan, which states: -

All new regeneration areas (SDRAs) and large-scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition,*

*performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. *Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.*

Of note in respect of compliance with Objective CU025: -

- Development threshold for compliance is 10,000 sq m.
- 5% to be met predominantly by internal floor space.
- The possibility of external cultural / community space is not precluded.
- The possibility of off-site cultural / community space may be considered (no more than half of the 5% requirement).
- The balance of space between cultural and community use can be justified on evidence based audit of the immediate area.

The following definitions of community and cultural uses are provided in the Development Plan:

Community Facility

A building, or part thereof, used for (community) activities organised primarily by the local community and to which the public may be admitted on payment of a charge or free of charge and includes community meeting space, parish centres, social/ non-sporting clubs such as youth clubs, bridge clubs and scouts' dens, clubhouses and family resource centres.

Cultural / Recreational Building and Uses

A building, or part thereof, used for cultural/ recreational purposes to which the public may be admitted on payment of a charge or free of charge such as:

- ♣ *A concert hall/ music hall/ music recital*
- ♣ *A theatre*
- ♣ *A cinema*
- ♣ *An art gallery (but not for the sale or hire of works of art)*
- ♣ *A museum*
- ♣ *A public library or public reading room*
- ♣ *A public hall*
- ♣ *An exhibition hall*
- ♣ *A social centre, community centre, or non-residential club, but not a dance hall.*
- ♣ *Display or exhibition of items of interest*
- ♣ *Bingo hall, skating rink etc.*

The consented development, as amended, will continue to deliver a mix of residential, food & beverage, co-working and community uses in accordance with its mixed use Z5 zoning.

In addition to providing a high quality residential scheme at upper levels, the ground level units and areas remain primarily given over to active uses including retail, café/restaurant, co-working, community and residential amenity spaces, public and private amenities and open space, which animate Parkgate Street and the surrounding public realm.

The proposed change of use from a café/restaurant (236sqm) to a residents' co-working space (c.229sqm) at ground level of Block B1 will activate community development for prospective residents. A further community space will be available for public hire (c.52sqm, representing 6.7% of the floor area subject to the proposed change of use). The space can be actively used as a meeting, socialising, exercise, exhibition space, with little change to the street front elevation. We refer the Planning

Authority to Pages 53-57 of the enclosed Architectural Design Statement, prepared by Reddy Architecture + Urbanism for further detail.

There remains a permitted 119 sq m co-working space available for public hire for cultural uses/events within the consented scheme in Block B. Block A delivers residential co-working space as part of its suite of internal residential amenities. There is also generous permitted restaurant/café unit at the ground level of Block A, with active frontage to Parkgate Street and the public open space within the consented scheme. The consented public open space will also have the potential to accommodate uses such as farmers markets and outdoor cinema events, subject to appropriate separate licencing and consents.

Notwithstanding that the Development Plan attempts to define 'cultural use', we would see it as a complex concept that is not so easy or simply defined. It could generally be considered to relate to contemporary, past or future human or social behaviour or the representation of this through education, art, music, dance, literature, fashion, architecture, ritual, religion, science, etc. Objective CU025 also appears to allow flexibility for alternative, external cultural spaces

The consented scheme, as amended, will continue to present an excellent opportunity to open up access to the River Liffey and the consented River Walk to the public, which had previously not been possible. The consented treatment of the Z9 area responds carefully to the zoning objective to provide recreational amenity and open space in this area, while addressing the heritage value of the structures in this location. We would therefore also argue that the integration of the site's redevelopment with the restoration of the protected and other historic structures on site, as consented under ABP-306569-20, will enhance the cultural fabric of the area.

The proposed development of 40no. residential units does not meet the 10,000sqm development threshold for Objective CU025, and we would consider it unreasonable of the planning authority to seek to retrospectively apply this new objective to the otherwise consented development at this site. However, 6.7% (53sqm) of the internal floor space subject of the proposed development, will be provided solely for community uses. We refer the Planning Authority to the enclosed proposed ground floor plan and Schedule of Accommodation for details of same.

This on site provision is then set within the context of an immediately surrounding area that enjoys a wealth of historic, cultural and recreational attractions. Significant historic features and cultural attractions within the immediate vicinity of the site include the City Quays, Heuston Station, Dr Steeven's Hospital, the Royal Hospital Kilmainham, the Guinness Brewery, Collins Barracks, and other protected structures along Parkgate Street. Significant publicly accessible recreational amenities are provided by the expansive Phoenix Park (including Dublin Zoo, Farmleigh, Aras on Uactarain, the Visitor Centre, landscaped gardens and playground facilities), the National Museum of Ireland at Collins Barracks, the Irish Museum of Modern Art at Kilmainham and the Guinness Storehouse, to name a few.

9 CONCLUSION

It is our considered professional planning opinion that the development subject of this submission should be supported by the Planning Authority on the grounds that:

- The application plans and particulars provide an appropriate response to the issues raised by the Planning Authority at preliminary pre-planning consultation.
- Our further response to the specific issues raised in the LRD Opinion issued on foot of the Section 32(C) LRD meeting held on 6 September 2023, is provided in the Response to LRD Opinion Report, prepared by Stephen Little & Associates
- The proposed development is consistent with the land use, strategic site regeneration and residential development and development standards, objectives and policies of the Dublin City Development Plan and other relevant Ministerial Guidelines.
- The proposed development will deliver much needed residential development within the city, at a highly accessible site immediately proximate to city centre retail, employment and amenities and a strategic public transport hub, at appropriate and sustainable density.
- The proposed apartments are designed to meet the relevant development plan and design guidelines standards for apartments, including also sunlight and daylight impact, passive surveillance of streets and spaces, and townscape visual impact.
- The proposed development is resilient to climate change and promotes sustainable modes of transport, encouraging a modal shift from private car to sustainable modes of transport.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

10 ENCLOSURES

The following items are included with this submission: -

1. Completed Dublin City Council Planning Application Form.
2. Completed Supplementary Form 19.
3. Newspaper Notice.
4. Site Notice.
5. Proof of Payment.
6. Part V Proposal Letter.
7. Dublin City Council Part V Validation Letter.
8. Letter of Consent from Davy Platform ICAV
9. Letter of Consent from Dublin City Council Parks Department
10. Letter of Consent from Dublin City Council Environment and Transportation Department
11. Confirmation of Feasibility from Uisce Eireann.
12. Design Acceptance Statement from Uisce Eireann.
13. Planning Application Report & Statement of Consistency, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
14. Response to LRD Opinion, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
15. Community and Social Infrastructure Audit, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
16. Childcare Needs Assessment, prepared by Stephen Little and Associates
17. Community and Social Infrastructure Assessment, prepared by Stephen Little and Associates
18. Community Safety Strategy, prepared by Stephen Little and Associates
19. Environmental Impact Assessment Screening Report, prepared by Stephen Little and Associates
20. Architectural drawings, prepared by Reddy Architecture & Urbanism (refer to enclosed schedule)
21. Architectural Design Statement, prepared by Reddy Architecture & Urbanism
22. Housing Quality Assessment, prepared by Reddy Architecture & Urbanism
23. Drainage Technical Statement (and associated reference documents), prepared by ARUP Group
24. Transportation Technical Statement, prepared by ARUP Group
25. Drawing No. TSK0016_265381-00_SK4, prepared by ARUP Group
26. Drawing No. TSK0017_265381-00_SK1, TSK0017_265381-00_SK1
27. Landscape Drawings, prepared by Mitchell + Associates (refer to enclosed schedule)
28. Extent of Proposed Works- Residential Courtyard, prepared by Mitchell + Associates
29. Note on Swift and Bat Boxes, prepared by Mitchell + Associates
30. Building Lifecycle Report, prepared by Aramark
31. Property Management Strategy Report, prepared by Aramark
32. Vacancy Report, prepared by Savills
33. Sunlight & Daylight Analysis, prepared by IN2 Engineering Design Partnership

34. Climate Action & Energy Statement, prepared by IN2 Engineering Design Partnership
35. Micro-Climatic Impact Assessment- Wind, prepared by IN2 Engineering Design Partnership
36. Street Lighting Note, prepared by IN2 Engineering Design Partnership
37. D1861-IN2-ZZ-ZZ-DR-E-0101, prepared by IN2 Engineering Design Partnership
38. Verified Photomontages, prepared by Modelworks
39. Operational Waste Management Plan, prepared by AWN Consulting LTD
40. Natura Impact Statement, prepared by Moore Group
41. Ecological technical Note, prepared by Moore Group
42. Chapter 10- Biodiversity (Flora and Fauna), prepared by Moore Group
43. Arboricultural Assessment & Impact Report, prepared by CML Hort + Arb Ltd
44. Drawing No. TPAR003 101, prepared by CML Hort + Arb Ltd
45. Drawing No. TPAR003 102, prepared by CML Hort + Arb Ltd
46. Addendum Landscape and Visual Impact Assessment, prepared by ARC Architectural Consultants
47. Architectural Heritage Impact Assessment, prepared by ARC Architectural Consultants

