


Planning Statement & Statement of Consistency with Dublin City Development Plan 2016-2022

Proposed Strategic Housing Development, Former Bailey Gibson Site, 326-328 South Circular Road, Dublin 8

May 2020



Prepared on behalf of
**DBTR-SCR1 Fund, a Sub-Fund of the
CWTC Multi Family ICAV**

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1. Introduction

1.1 Introduction

This Planning Statement has been prepared by McCutcheon Halley (MH) Chartered Planning Consultants on behalf of DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV.

The Applicant is seeking permission for a Strategic Housing Development (SHD) to An Bord Pleanála (ABP) in compliance with Section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016, for a proposed residential led Build To Rent (BTR) scheme together with tenant amenities and commercial development at the Bailey Gibson site, South Circular Road, Dublin 8.

The Applicant has carried out consultation with the Planning Authority under Section 247 of the Planning and Development Act 2000-2016. A pre-application consultation meeting was also held with ABP under Section 6(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 on 2nd March 2020. A separate report entitled **Response to An Bord Pleanála Pre-application Consultation Opinion** is submitted under separate cover, to address the specific matters raised by An Bord Pleanála (ABP) in their Notice of Pre-Application Consultation Opinion (case ref. ABP-306472-20) issued on the 20th March 2020 in relation to the proposed development.

The proposed development meets the threshold for SHD, being a development of 100 or more units on land zoned for residential use, and accordingly is subject to the provisions of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The proposed development will involve the demolition of all existing structures on site (11,234.42 sq.m) and an ESB substation (21 sq.m) and construction of 416 no. BTR residential units comprising 412 no. apartments and 4 no. 4-bedroom townhouses across 5 no. blocks, ranging in height from two to sixteen storeys. The residential blocks will incorporate tenant amenities including a gymnasium, business centre, entertainment areas and concierge offices of 812 sq.m, a crèche (233 sq.m), restaurant/café/bar (164 sq.m) at ground floor level and commercial floorspace at ground floor level (224 sq.m) to facilitate a range of uses including Class 1 (shop), Class 2 (financial/professional services), Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall).

A total of 106 no. resident car parking spaces including 10 no. disabled spaces and 12 no. motorcycle spaces are proposed at basement level. 12 no. podium level car parking spaces are to be provided with 10 no. reserved for 'Go-Car' and an additional 15 no. visitor car parking spaces at surface level, with 3 no. spaces reserved for taxis and crèche drop offs and a loading bay to service commercial units. The provision of 543 no. long stay cycle spaces at basement and ground level, as well as 84 no. short stay visitor cycle spaces at surface level are also proposed. In addition, partial realignment and widening of Rehoboth Place will be undertaken to provide a new carriageway width of 5m and minimum footpath widths of 2m.

All blocks will be connected via extensive public realm and resident amenity spaces and a network of internal roads that will be shared by pedestrians, cyclists and motorists. This residential development will be complemented by high quality landscaping that has regard to the existing site features and established character of the area.

1.2 Masterplan

A Masterplan for Strategic Development and Regeneration Area (SDRA) 12 – St Teresa's Gardens, inclusive of the entire Bailey Gibson site, has been prepared in conjunction with Dublin City Council and is submitted under separate cover in support of this SHD application. This Masterplan provides a framework for an integrated approach to the redevelopment of this strategically located urban block and aims to secure physical,

social and economic regeneration of the area. The Masterplan is cognisant of national planning and development policy which requires such strategically located sites to be developed in an efficient and effective manner to optimise their development potential with regard to scarce urban land and the need to increase housing supply.

The Masterplan provides a comprehensive analysis of the site and its surroundings which informed the design of the proposed development and supports an integrated approach to the proposed urban form, land use, movement and permeability. In addition to the current SHD application, the balance of the Masterplan proposal will be the subject of separate planning applications.

This proposal is consistent with the agreed Masterplan objectives and approach to development, however minor changes were made arising from the final detailed design for the application.

1.3 Structure of this Report

This report provides an overview of the project including the site context, its planning history, the development rationale and compliance with the policies and objectives of the Dublin City Development Plan 2016-2022. It should be read in conjunction with the accompanying documentation and drawings, as follows:

- SDRA 12 Masterplan (DCC/HJL)
- Architectural Design Statement & Drawings (HJL)
- Housing Quality Assessment (HJL)
- Landscape Design Statement & Drawings (NMP)
- Construction Management Plan (Garland)
- Engineering Infrastructure Report & Drawings (BMCE)
- Construction & Demolition Waste Management Plan (BMCE)
- Traffic and Transport Assessment (SYSTRA)
- Mobility Management Plan (SYSTRA)
- Statement of Consistency with National, Regional and Section 28 Ministerial Guidelines (MH Planning)
- Material Contravention Statement (MH Planning)
- Social Infrastructure Audit (MH Planning)
- Environmental Impact Assessment Report (MH Planning)
- Childcare Assessment (MH Planning)
- Appropriate Assessment Screening Report (BSM)
- Sunlight, Daylight and Overshadowing Assessment (IES)
- Pedestrian Comfort CFD Analysis (IES)
- Landscape and Visual Impact Assessment (Chris Kenneth Consulting)
- Photomontages (Modelworks)
- Energy and Sustainability Report (O'Connor Sutton Cronin)
- Public Lighting Report (O'Connor Sutton Cronin)
- Part V Submission (HJL)

2. Site Description and Context

2.1 Site Location

The subject land forms part of a wider Masterplan area located between the South Circular Road and Cork Street in Dublin 8, approximately 2.3km southwest of Dublin city centre and within the canal cordons. The site straddles the Strategic Development and Regeneration Area (SDRA) 12 – St Teresa’s Gardens which incorporates part of the Bailey Gibson site in the west (c.2.08ha), the Player Wills site to the east (2.39ha) and is connected by DCC lands (5.8ha), see **Figure 1**.

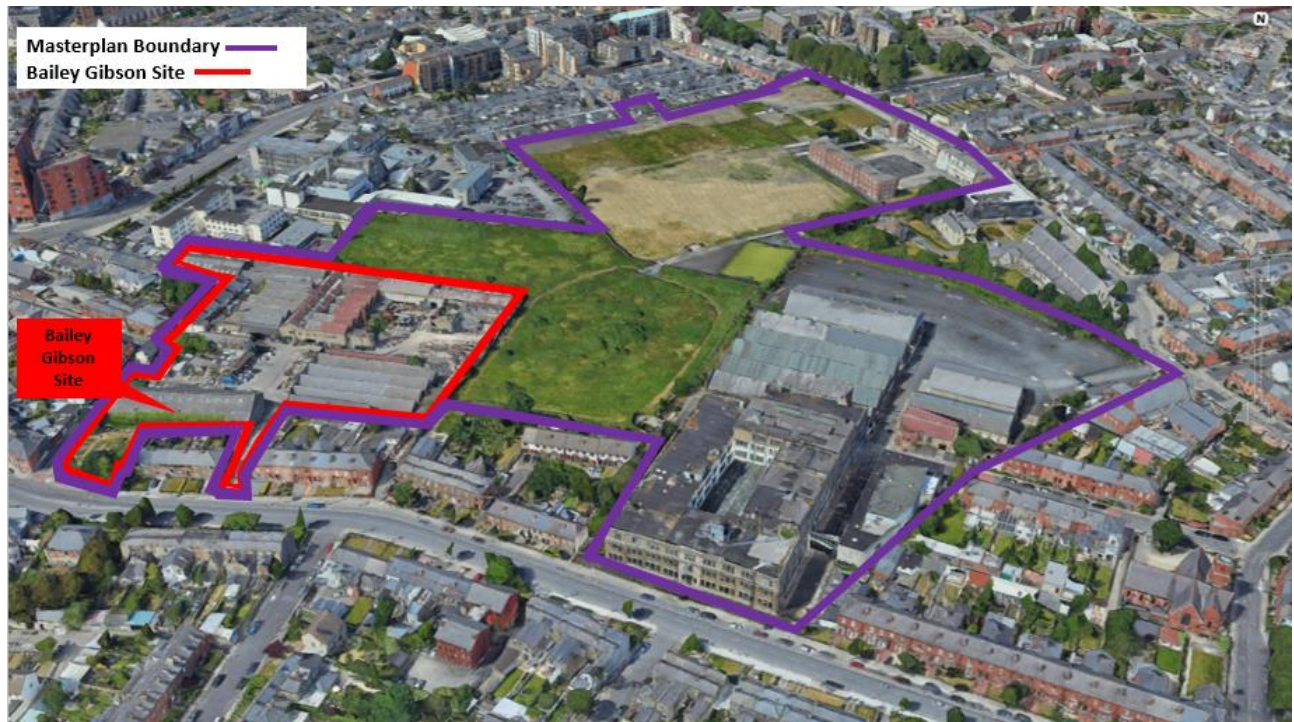


FIGURE 1 SITE LOCATION WITHIN BOUNDS OF MASTERPLAN

The site is roughly square-shaped and contains former industrial premises comprising 9 no. factory buildings. It is located on the northern side of South Circular Road and is bounded to the west by Rehoboth Place / Rehoboth Ave with terraces of two-storey houses and by the Coombe Hospital and the Council Playing fields to the north-east. Nos. 314-324 and 330-338 South Circular Road bound the site to the south together with an open piece of ground on the corner with Rehoboth Place.

Vehicular access is gained principally by an entrance located between No's. 324 and 330 South Circular Road. A wayleave is also situated between the open ground and No. 338 South Circular Road which extends behind the row of houses at No's. 330-338. The site has a secondary frontage to Rehoboth Place with access points along this road. The eastern boundary adjoins Dublin City Council open space / playing fields and beyond, is the former Players Wills factory site.

The application area (i.e. land that is outlined in red for the purposes of the planning application) incorporates a c.1.53 hectare strategic brownfield site, with the balance of 0.646 hectares included to enable works to be undertaken to facilitate municipal connections and public road improvements, see **Figure 2**. A Letter of Consent from Dublin City Council accompanies this application for lands included in the application that are outside of the Applicant's control and required to facilitate the proposed development.

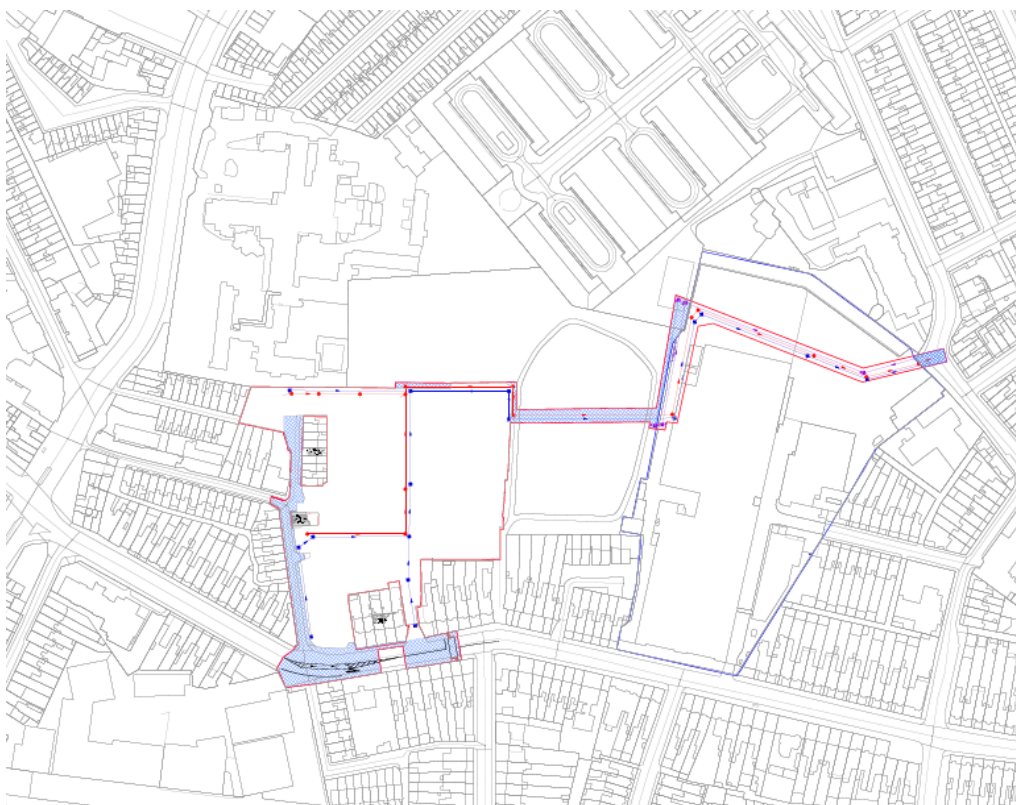


FIGURE 2 APPLICATION AREA

The subject site is located within an established suburban area and is predominantly surrounded by low density residential development, as well as a range of commercial, medical, recreational, community and educational uses, as indicated in **Figure 3**.

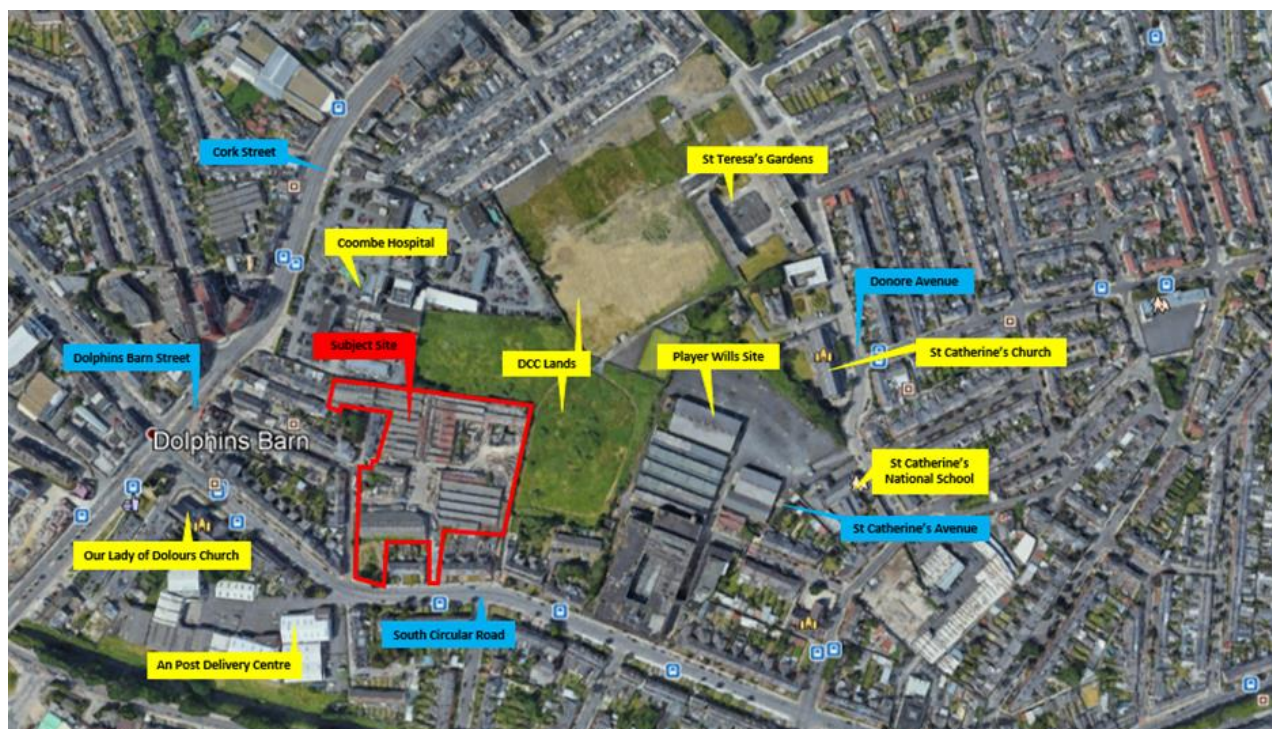


FIGURE 3 SURROUNDING USES

To the south and west of the site along the northern side of South Circular Road is low rise residential development, predominantly 2-storey terraced housing, see **Figure 4**. On the southern side of South Circular Road, existing residential development is also primarily comprised of 2-storey terraced houses.



FIGURE 4 EXISTING TERRACED HOUSING ON THE SOUTH CIRCULAR ROAD

Further west along South Circular Road is An Post Delivery Centre and Our Lady of Dolours Church. The Coombe Maternity Hospital is situated north-west of the subject site, immediately adjoining the DCC lands. St Catherine's National School and St Catherine's Church are located to the north-east on lands adjacent to SDRA 12. St Teresa's Gardens local authority housing estate is located to the north-east of the subject site.

2.2 Wider Context

The location is close to major employment centres both in the city centre and surrounding suburbs and along transport corridors including the LUAS red line and South Clondalkin Quality Bus Corridor (QBC) which extends along Cork Street and Dolphin's Barn Street.

The site is centrally located being c.2.3km south-west of Dublin city centre. Whilst surrounding uses are predominantly residential, there are a wide variety of other land uses in the vicinity. Dolphins Barn is approximately 180m to the west of the site (less than 3 minute walk) and characterised by a mix of low rise housing and newer apartment buildings ranging from 6 to 8-storeys in height.

Dolphin's Barn also contains an array of retail uses including a Tesco Express supermarket, SPAR convenience store, Lowes Bar and Lounge, launderette, pharmacy, funeral service, multiple hair salons, fast food outlets and specialty ethnic grocers (Afro-Caribbean, Bulgarian, Polish and Middle-Eastern).

Cork Street is situated to the north-west of the subject site, adjacent to the Coombe Hospital. A series of new apartment blocks ranging from 6 to 8-storeys in height line the street, as well as a range of retail outlets including a Lidl supermarket, furniture store, pharmacy, Centra convenience store with post office and a café. This part of the city including the Liberties, Newmarket and Digital Hub, has been designated as a regeneration area and is currently in transition, planned to evolve into a civic and commercial hub.

2.3 Connectivity

The subject site is well connected in terms of road and public transport links, see **Figure 5**. Fatima LUAS stop is c.800m north-west of the site (walk time less than 10 minutes), while South Clondalkin QBC connecting the site with the city centre and south-western suburbs of Dublin extends along Cork Street and Dolphin's Barn Street and is situated c.200m to the west (2-4 minute walk).



FIGURE 5 SITE CONNECTIVITY

The locality is well served by Dublin Bus, with the nearest bus stops being c.100m from the site on the northern side of South Circular Road and c.96m away on the southern side of South Circular Road. These bus stops provide the subject site with connections to the city centre, Ashington in north Dublin, Drimnagh to the south-west and Greenogue Business Park to the west.

Additional high frequency bus services are also available along the nearby QBC at Dolphin's Barn Street/Cork Street, where the nearest bus stops are located c.250m and c.290m away on the eastern and western sides of the QBC respectively. These bus stops are served by routes 17 and 17D (Rialto to Blackrock station), 27 (Jobstown to Clare Hall), 56A (Tallaght to Ringsend Road), 77A and 77X (Citywest to Ringsend Road) and 151 (Foxborough to Docklands), connecting the subject site with Dublin city centre and the greater metropolitan area.

2.4 Facilities

In January 2020 a comprehensive **Social Infrastructure Audit (SIA)** was undertaken in relation to the SDRA 12 lands by McCutcheon Halley Planning and is submitted under separate cover. The SIA identified a large number of community facilities within a 1km buffer of the subject lands. These developments were broken down into categories and are outlined below. A list of the facilities and services is included in the enclosed SIA.

A number of sports and leisure facilities are located in the area providing recreational opportunities for a wide population, see **Figure 6**. These comprise sports clubs including Synge Street Templeogue GAA Club, Clogher Road Sports Centre, St Teresa's Football Club, St Catherine's Sports Club, Donore Boxing Club and the National Stadium.

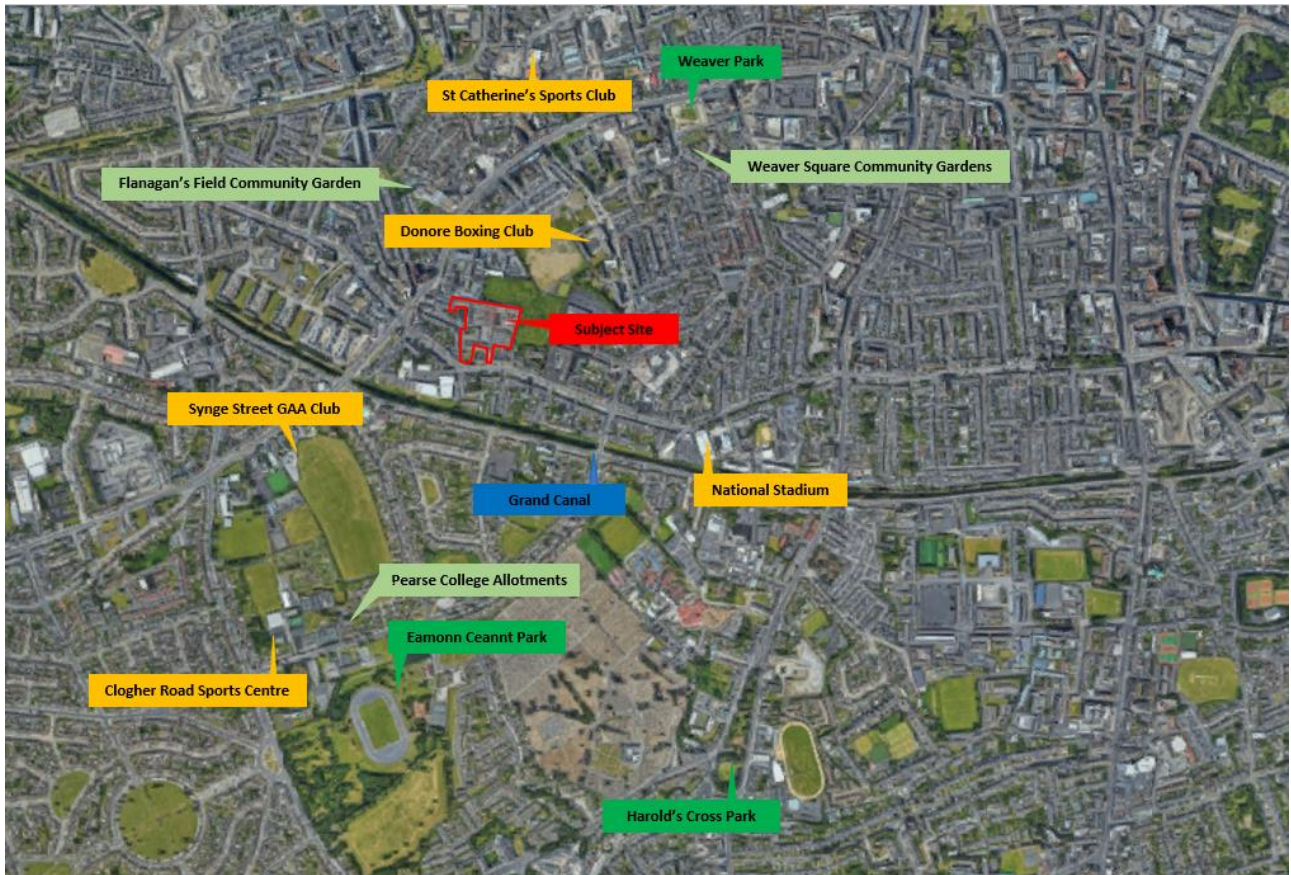


FIGURE 6 LOCAL RECREATIONAL FACILITIES

Several parks containing children's playgrounds are also located nearby including Eamonn Ceannt Park, Harold's Cross Park and Weaver Park. A number of allotments and community gardens are situated in close proximity to the subject site including Pearse College Allotments, Weaver Square Community Gardens and Flanagan's Fields Community Garden. The Grand Canal is another significant recreational asset within the vicinity of the subject site.

A public park and playing pitches are also proposed as part of the approved Masterplan which encompasses the wider development area and will be located on the DCC lands immediately adjoining the subject site.

The subject site is also accessible to a large number of educational facilities encompassing primary, post-primary and third level establishments, see **Figure 7**. In total, the SIA identified 14 no. local primary schools, 3 no. post primary schools and 4 no. third level educational establishments, all of which are listed in **Table 1**.

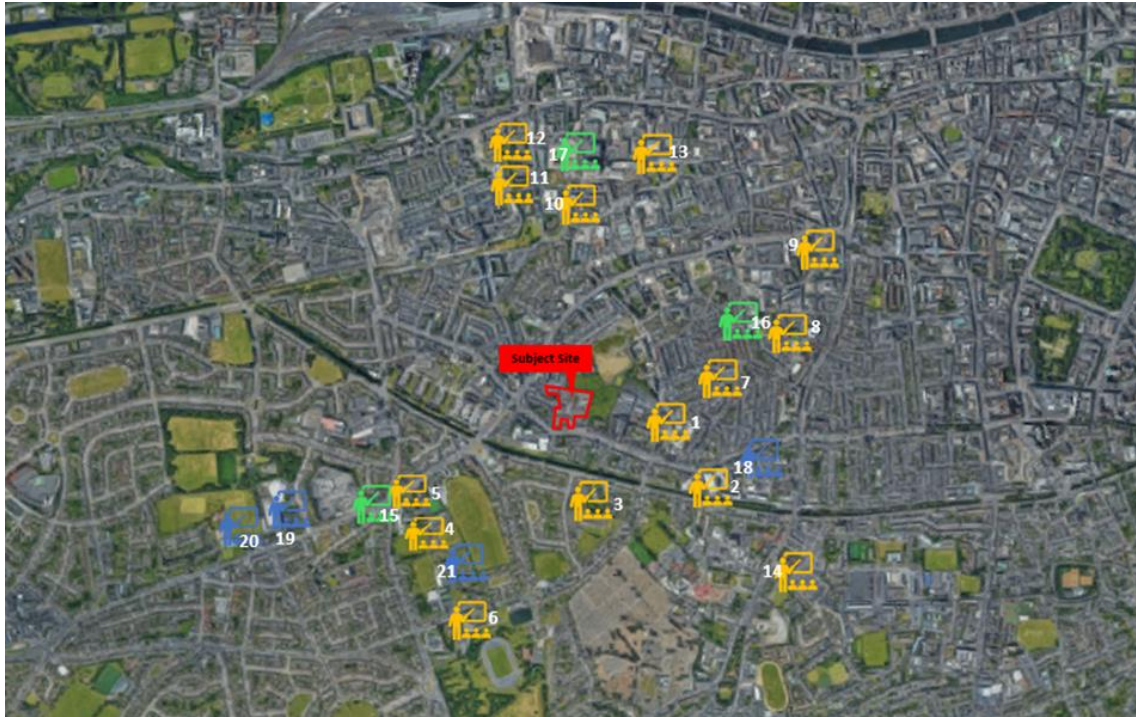


FIGURE 7 LOCAL EDUCATIONAL FACILITIES

	No.	Educational Establishment	Location
Primary School	1	St Catherine's National School	Donore Avenue, D8
	2	Griffith Barracks School	South Circular Road, D8
	3	Scoil Iosaigh	Crumlin Road, Dublin 12
	4	Scoil Mhuire Og1	Crumlin Road, Dublin 12
	5	Loreto Primary School	Crumlin Road, Dublin 12
	6	Marist National School	Clogher Road, Crumlin, D12
	7	Scoil Treasa Naofa	Petrie Road, Merchant's Quay, Dublin
	8	Presentation Primary School	Clarence Mangan road, Warrenmount, D8
	9	St Brigids Primary School	The Coombe, The Liberties, Dublin
	10	Canal Way EducateTogether N.S.	Basin Lane, James' Street, Dublin
	11	St James Primary School	Basin View, Ushers, Dublin
	12	Mater Dei National School	Basin Lane, James' Street, Dublin
	13	St Catherine's Primary School	Crane Street, Ushers, Dublin
	14	St Clare's Convent N.S.	Harolds Cross, Rathmines
Post Primary	15	Loreto College	Crumlin Road, Crumlin, D12
	16	Presentation Secondary School	Clarence Mangan Road, Warrenmount
	17	Christian Brothers Secondary School	Basin View, Ushers, Dublin
Third Level	18	Griffith College	South Circular Road, D8
	19	Crumlin College	Crumlin Road, D8
	20	Pearse College	Crumlin Road, D8
	21	St Kevin's College	Clogher Road, D12

TABLE 1 LOCAL EDUCATIONAL FACILITIES

3. Planning History

Records identify 7 no. planning applications relating to the subject site, of those 3 no. were invalidated but are included in **Table 2** below for completeness. Planning application (Ref. 4423/06) which was approved in 2008 has now lapsed. A summary of the key design parameters is provided in the Table below.

Application Reference	Development Description	Decision	Notes
4423/06 4 August 2006	Mixed use residential and commercial development comprising 270 No. residential units, 5 No. commercial/retail units, 9 No. offices, medical centre, leisure centre and ancillary site works.	DCC Granted Permission 9 January 2007	<p>The application was the subject of a third party appeal and ultimately permission was granted by ABP. Concerns raised by the appellants related to:</p> <ul style="list-style-type: none"> • The Dolphin's Barn Framework Plan was not adopted or available for public viewing; • Excessive density of development; • Excessive height of the proposed blocks at 8 to 12-storeys; • Adverse impacts on residential amenity; • Traffic congestion; • Inadequate car parking provision; • Location of social and affordable housing; • Inadequate capacity of existing infrastructure; • 10-year permission too long; • No fast food outlets should be permitted in the commercial/retail units.
		Grant Permission by ABP (Ref. PL29S. 221717) 11 April 2008	
3130/06 x 1 22 March 2013	Extension of duration of permission Ref. 3130/06 for a mixed-use development.	DCC Refused 4 July 2013	The site was rezoned under DCDP 2011-2017 from Z6 to Z14 and designated as part of a Strategic Development and Regeneration Area. The City Development Plan restricted the height of residential buildings to six storeys in the inner city area.
3130/06 24 May 2006	Proposed mixed-use development involving demolition of all industrial, warehouse and office buildings on the site and construction of 11 No. buildings ranging in height from one to eleven stories (over basement). The proposed development had a gross floor area of 65,604.8sq.m and comprised the following: <ul style="list-style-type: none"> • own door office units (2,071.6sq.m); 	DCC Granted Permission 29 November 2006	<p>The application was the subject of a third party appeal and ultimately permission was granted by ABP. Of particular note, the following conditions were imposed:</p> <ul style="list-style-type: none"> • permission limited to 5 years;

	<ul style="list-style-type: none"> 13 No. retail units (4,696.4sq.m); anchor food retail supermarket (1,756sq.m) with textile department (1,373sq.m) and associated staff and service facilities (1,357sq.m); 2 No. restaurant / cafes (529sq.m); school building (2,420sq.m); creche (630sq.m); community centre (145sq.m); and works and service areas (824.5sq.m) and ancillary infrastructure (954.8sq.m). <p>The residential component of the development included 484 no. apartments consisting of:</p> <ul style="list-style-type: none"> 51 no. 1 bedroom units; 312 no. 2 bedroom units; and 121 no. 3 bedroom units, with deck access and roof terraces. <p>Provision was made for 670 underground car parking spaces and 636 bicycle park spaces.</p>	<p>Grant Permission by ABP (Ref. PL29S. 221190) 11 April 2008</p>	<ul style="list-style-type: none"> more detailed analysis of the traffic impacts was required including the proposed access arrangements, ingress and egress, school/ creche set down places and car park access; and prior to demolition of the Player Wills factory full details of the physical survey including photographic record along with the architectural assessment shall be forwarded to the Irish Architectural Archive. <p>The decision of ABP further modified the proposed development with a reduction in apartment units to c.310. In addition, building heights were reduced to 8 floors.</p>
<p>5250/04 9 November 2004</p>	<p>This application encompassed the site comprised of three parts including the 'Bailey Gibson Site' (1.52ha) and the 'Player Wills Site' (2.80ha) linked by parkland in the ownership of DCC known as The Boy's Brigade Playing Fields (1.86ha). Site demolitions were proposed including the existing administration/theatre building, Bailey Gibson office buildings and all warehousing and storage structures, with the exception of the four storey John Player building, South Circular Road and partial demolition and alterations to an existing two storey building adjacent to 40 Rehoboth Place. Also included was the demolition of a single storey flat roof storage shed located within the site and zoned Z2.</p> <p>The proposed development consisted of:</p> <ul style="list-style-type: none"> office units (7,152.4sq.m); retail units (9,286.1sq.m); neighbourhood shop (1,422sq.m); store (347sq.m); restaurant / cafe (1,018sq.m); general medical practice centre (284.9 sqm); medical building (5,836.6sq.m); leisure facility (1,618sq.m); National Climbing Centre (460sq.m); live-work units (1,740.5sq.m); theatre (958 sqm); O2 plant room (19.8sq.m); and ancillary infrastructure, works, services and service areas (5,916.84sq.m). <p>The Z1 residential component of the development comprised 879 apartment units including:</p> <ul style="list-style-type: none"> 170 social and affordable housing units (17,452.1sq.m); and 	<p>DCC Refused 23 December 2004</p>	<p>The application was refused on the following grounds:</p> <ul style="list-style-type: none"> The scale, massing, configuration and height of the proposed podium block including the proximity of the block to adjoining existing development. The proposed development is deficient with respect to private open space for residential development. Section 14.8.0 of Dublin City Development Plan (DCDP) 1999 requires provision of 8-10sq.m of private open space per bed space in this location. Having regard to Section 3.3 Appendix 18 of the DCDP 1999, the proposed 28 storey high building would be premature pending the preparation of a "framework plan/action area plan" justifying the erection of such a high building/s.

	<ul style="list-style-type: none"> 709 private apartment units (69,159.1sq.m). <p>Further provision was made for 1,126 underground car parking spaces and 1,200 bicycle spaces.</p>		
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TABLE 2 DETAILED PLANNING HISTORY

Further to the detailed planning history indicated in **Table 2**, a review of planning applications in the vicinity of the subject site was undertaken. Applications of note have been identified in **Table 3** and reflect the increasing intensity of approved developments in the surrounding area, particularly to the north of the site in close proximity to Cork Street. These approved developments also reflect the transitional character of much of the surrounding locality, as opportunities for redevelopment are presented and future proposals align with evolving national and local policy objectives.

Application Reference	Development Description	Decision
<p>3323/17</p> <p>PL29S.300431</p> <p>IDA Ireland, Newmarket Dublin 8</p>	<p>Mixed use – residential, commercial & cultural</p> <p>The proposed development is arranged in 4 no. blocks enclosing a central courtyard above lower ground level and double basement. The proposed development proposes the demolition of all existing buildings on site and the redevelopment of the site for mixed use purposes. Details include:</p> <ul style="list-style-type: none"> • A basement to provide 112 car parking spaces together with 195 no. bicycle parking spaces; • A western block (a part 5, part 7 and part 8-storey building) over lower ground and basement levels providing a hotel (7,797.72 sq.m GFA); • A southern block (part 5- and 6- storey building over basement comprising 743.71 sq.m (GFA) of retail floorspace at ground floor level and 34 no. residential units on the upper floor; • A northern block (part 7- and part 8- storey building) over lower ground and part double basement providing 58 no. residential units; • The eastern block is a part 4-, part 5- and part 6-storey building over lower ground and basement levels providing 7,346.00 sq.m (GFA) of office floorspace; • Landscaping measures in the courtyard and areas of public realm; and • A single storey artist studio unit of 44 sq.m (GFA) 	<p>DCC granted permission</p> <p>ABP granted permission on appeal</p> <p>13 July 2018</p>
<p>3475/14</p> <p>PL29S.244805</p> <p>Mill Street, Newmarket, Dublin 8</p>	<p>Mixed-use student accommodation, office, retail and restaurant / event space</p> <p>The proposed development is arranged in a total of 5 new blocks (A, B, C, D, E) which range in height from 4 no. storeys to 7 no. storeys with setbacks at various levels, and a basement plant area (313 sq.m) under Block C (located centrally within the site).</p> <p>The proposed development comprises a mixed-use student accommodation, office, retail and restaurant / event space with development totalling 18,796 sq.m (GFA), including:</p> <ul style="list-style-type: none"> • Restoration of No. 10 Mill Street (Protected Structure) and the adjoining former Mission Hall; • 96 no. student accommodation units (including 36 no. studio units), providing a total of 406 no. student bed-spaces; • Ancillary student accommodation facilities including social space, gym, laundry facilities, management office (15,093 sq.m GFA); • Provision of a single storey pavilion building for student and community uses (65 sq.m); • 4 no. retail/ commercial units; ranging in size from 35 sq.m to 201 sq.m (GFA 539sq.m); • New office space (2,137 sq.m GFA); • Restoration, adaptation and reuse of No. 10 Mill Street as a restaurant/ café/ multi-purpose event space (507 sq.m); and • Mission Hall for office use (520 sq.m GFA). 	<p>DCC granted permission</p> <p>ABP granted permission on appeal</p> <p>01 September 2015</p>
<p>2812/17</p> <p>The ‘Brewery Block’, Dublin 8</p>	<p>Mixed-use student accommodation and co-working space</p> <p>Permission for development at a 0.4274ha site known as a portion of Brewery Block, bounded by Newmarket, St Luke’s Avenue, Brabazon Place/Brabazon Row and Ardee Street, Dublin 8.</p>	<p>DCC granted permission</p> <p>6th December 2017</p>

	<p>The site contains a Protected Structure (stone warehouse) at the corner of Newmarket and Brabazon Place/Brabazon Row.</p> <p>The proposed development comprises:</p> <ul style="list-style-type: none"> • Demolition of two existing industrial warehouses (1,236sq.m) and brick ruins (99sq.m); • Retention of the stone warehouse, the brick tower and the existing walls at ground floor level; and • Construction of a three to seven storey mixed-use development in two blocks (11,834sq.m GFA) comprising a co-working shared space with associated cafe/bar; and 349 no. student accommodation bed-spaces with associated facilities, which will be utilised for short-term lets. 	
<p>3853/17</p> <p>PL29S.302149</p> <p>43-50 Dolphin's Barn Street, Dublin 8</p>	<p>Mixed-use residential and retail</p> <p>The site is bound by Dolphin's Barn Street to the east, No. 51 Dolphin's Barn Street to the north east.</p> <p>The proposed development will include the demolition of the existing former factory building and buildings which front onto Dolphin's Barn Street (Nos. 43-50) and the construction of a part four to part seven storey residential and retail building fronting Dolphin's Barn Street and a basement level car park (13,150 sq.m GFA).</p> <p>The proposed development comprises:</p> <ul style="list-style-type: none"> • 1 no. retail unit at ground floor (1,405 sq.m GFA); • 70 no. apartments from first to sixth floor level comprising 41 no. 1 beds and 29 no. 2 beds (proposed as Build to Let accommodation); • 2 no. residential entrances at ground floor level and communal facilities (410 sq.m GFA); • 67 no. car parking spaces and 18 no. car parking spaces at basement level; • A bike store providing 80 no. bicycle parking spaces and a bin store at ground floor level; and • Landscaping works including a communal open space area at first floor level measuring 693 sq.m. 	<p>DCC granted permission</p> <p>ABP granted permission on appeal</p> <p>24 October 2018</p>
<p>3426/18</p> <p>The Donnelly Centre Phase 2 Building, Cork Street/Brickfield Lane, Dublin 8</p>	<p>Mixed use - student accommodation and commercial</p> <p>The proposal relates to student accommodation development of c.5,231sq.m GFA, to include a retail/enterprise unit at ground floor level (119 sq.m) as well as ancillary areas.</p> <p>The proposed development will consist of the demolition of the Donnelly Centre Phase 2 (c.728 sq.m GFA) and construction a development comprising:</p> <ul style="list-style-type: none"> • 166 no. student accommodation bed spaces with associated ancillary areas (gym, common room, management, office reception and store-room); • A retail/enterprise unit (GFA 119 sq.m) in a five to seven storey high building over basement with frontage onto Cork Street and Brickfield Lane; • Open space within a courtyard at ground floor level (GFA 234 sq.m); • 82 no. cycle parking spaces are proposed at ground floor level; and • A set down parking area and disabled car parking space. 	<p>DCC granted permission</p> <p>8th November 2018</p>

ABP 305061	<p>Student accommodation</p> <p>Strategic Housing Development</p> <ul style="list-style-type: none"> • The demolition of all buildings and structures (c.2,575 sq m) on site with the exception of the front Art Deco section of the building, which will be retained, restored to its original form, and incorporated into the proposed development; • Construction of a mixed-use building (with a total area of c.11,266 sq m) ranging in height from three to seven storeys over basement comprising a student accommodation scheme of 317 No. student beds arranged in 313 No. bedrooms (276 No. 1-bed bedrooms, 4 No. 2-bed bedrooms and 33 No. studios); • Café with an outdoor garden area; • 4 No. open courtyards (3 No. at Ground Floor Level and 1 No. at First Floor Level); • TV lounge; gym; cinema; communal areas; circulation areas; reception; library; and a meeting/event room; • Parking for 160 No. bicycles accessed directly from South Circular Road; 7 No. visitor bicycle parking spaces located to the front of the building off South Circular Road; • Associated works 	<p>ABP Granted Permission</p> <p>15th November 2019</p>
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TABLE 3 APPROVED DEVELOPMENT AT SURROUNDING SITES

The geographical distribution of these development sites to the north and west of the Bailey Gibson site, in and around Cork Street, reflects the rapidly changing nature of this area. Of the 6 no. permissions set out in the Table above, 4 no. relate to the provision of student accommodation with a combined total of 1,234 student bed spaces.

This subject proposal, being a Build to Rent residential led development, complements the provision of student accommodation, augmenting the variety of housing typologies in this south-west inner city location.

4. Pre-planning Consultation

In accordance with Section 247 of the Planning and Development Act 2000 (as amended) a pre-planning meeting was held with Dublin City Council on Friday 27th September 2019, during which details of the proposed development were presented and discussed.

Feedback relating to the proposal was provided by the City Council and the issues highlighted included;

- Architectural detail
- Form and massing
- Sunlight and Daylight analysis
- Transportation

The Design Team considered the feedback received from Dublin City Council and all matters are addressed in the supporting documentation that accompanies this application to An Bord Pleanála.

In the context of the preparation of the Masterplan for the entire site, a number of separate pre-application consultations took place with the Planning Authority prior to lodgement of the SHD application. Collectively the pre-application consultations have informed the final layout and design for the Masterplan, including the current proposal.

Additionally, Public Open Days were hosted by the Applicant over 3 no. days on the 11th and 12th July 2019 and on the 12th March 2020. The public were notified via leaflet drops, social media and press advertisements. The information presented related to the future development of the Masterplan lands i.e. Bailey Gibson, Player Wills and Dublin City Council lands.

The purpose of the open days was to meet the public and listen to their thoughts, opinions and ideas as well as to show projected timelines for the development and provide people with an insight into the planning application. Members of the project team were present and provided information and answered questions as necessary. Matters raised by the public at the Open Day related to;

- quantum and quality of open space to be provided within the masterplan lands;
- quantum and type of commercial uses proposed;
- desire for lands to deliver vibrancy and vitality during the day and night;
- future plans for St. Catherine's National School;
- mix of unit sizes and types;
- impact of construction traffic; and
- quantification of traffic movements during the operational stage and desire for improved cycling and pedestrian access.

Further to the above, a pre-application consultation meeting was also held with An Bord Pleanála and representatives of the Applicant under Section 6(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 on 2nd March 2020. A separate report entitled **Response to An Bord Pleanála Pre-application Consultation Opinion** is submitted under separate cover to address the specific matters raised by An Bord Pleanála (ABP) in their Notice of Pre-Application Consultation Opinion (case ref. ABP-306472-20) issued on the 20th March 2020 in relation to the proposed development.

5. Proposed Development

5.1 Development Description

The design rationale is to create and deliver a high quality sustainable residential development within this strategic infill site which respects its setting and maximises the site's natural attributes while achieving maximum efficiency of existing infrastructure. The Proposed Site Layout is illustrated on **Drawing No. PL0002** that accompanies this application.

DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV intend to apply to An Bord Pleanála for permission for a Build to Rent Strategic Housing Development at the 'Bailey Gibson' site, South Circular Road, Dublin 8. The application area is c.2.18 hectares, it includes the Bailey Gibson site (1.53 hectares) and 0.646 hectares to accommodate works to facilitate connections to municipal services and works proposed to public roads.

The development will consist of;

- i. the demolition of all buildings and structures on the site, including 9 no. buildings (11,234.42 sq.m GFA) and 1 no. ESB substation (21sq.m) to make way for development of the site;
- ii. the construction of 416 no. residential units in 5 no. blocks, with a cumulative gross floor area of 31,117 sq.m for the residential component comprising;
 - a. 404 no. apartments in 4 no. blocks (BG1-4) ranging in height from 2 storeys to 16 storeys, over single level basement on part of the site, incorporating 19 no. studio units; 251 no. 1 bed and 134 no. 2 bed, all with private amenity space in the form of balconies;
 - b. 2 no. 2-storey 2-bedroom duplex apartments all with private amenity space in the form of balconies contained in BG3.
 - c. 6 no. 3-storey 3-bedroom triplex apartments all with private amenity space in the form of terraces contained in BG1;
 - d. 4 no. 3-storey 4-bedroom townhouses all with private amenity space in the form of back gardens and 4 no. car parking spaces contained in BG5;
- iii. the construction of tenant amenities with a cumulative gross floor area of 812 sq.m comprising; in BG1, a concierge office (86 sq.m at ground floor level); in BG2, gymnasium (260 sq.m), combined concierge/marketing/coworking space (191 sq.m) at ground floor and communal living/ kitchen (166 sq.m) and residents lounge (29 sq.m) at first floor level; and in BG3, a resident's lounge (24 sq.m) that connects with the communal garden.
- iv. provision of 2,618 sq.m of communal open space distributed as follows; in BG1, central courtyard area (774 sq.m) and roof terrace (60 sq.m); in BG2, roof terrace (926 sq.m); in BG3, courtyard (545 sq.m); and in BG4, courtyard (313 sq.m).
- v. the construction of a childcare facility with a gross floor area of 233 sq.m and associated play areas of 50 sq.m and 3 no. set-down parking spaces;
- vi. the construction of 164 sq.m of commercial floorspace to facilitate a restaurant/café/bar at ground level in Block BG2 and 224 sq.m of commercial floorspace at ground floor level in Block BG1 to facilitate a range of uses including Class 1 (shop), Class 2 (financial/professional services) , Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall);
- vii. the construction of a single storey ESB sub-station (14 sq.m GFA) and a double ESB sub-station (28 sq.m GFA);

- viii. partial realignment and widening of Rehoboth Place to provide a new carriageway width of 5m, enabling fire tender and refuse truck access, and minimum footpath widths of 2m on both sides of the street.
- ix. at basement level, the provision of 106 no. car parking spaces including 10 no. dedicated disabled parking spaces. 10% of the spaces will be fitted with electric charging points. 12 no. motorcycle spaces will also be provided at basement level.
- x. at podium level, the provision of 12 no. car parking spaces, including 1 no. disabled parking space (10 no. reserved for car sharing scheme 'Go Car') and 15 no. on street visitor car parking spaces (4 no. of which will be reserved for 'Go Cars'), including 1 no. dedicated disabled parking space, together with 3 no. set down parking spaces for taxis and crèche drop offs and a loading bay to service the commercial units.
- xi. the provision of 543 no. long-stay bicycle parking spaces, comprising 315 no. spaces at basement level, accessed via a dedicated cycle stairway, and 228 no. spaces at surface level. 84 no. short stay visitor cycle spaces are provided at surface level.
- xii. vehicular access will be via Rehoboth Place and vehicular exit will be via the existing access on South Circular Road. Provision of 3 no. pedestrian access points; 1 no. from the South Circular Road; 1 no. from Rehoboth Place; and 1 no. from Rehoboth Avenue. Improvement works to the existing entrance on South Circular Road, removal of existing uncontrolled pedestrian crossing and provision of a new signalised pedestrian crossing is proposed on South Circular Road to facilitate improved access for existing and future residents of the area to bus stops along with improvement to the footpath provision along South Circular Road opposite Rehoboth Place entry.
- xiii. all ancillary site development works, plant, waste storage, meter rooms, rooftop solar photovoltaics, landscaping, boundary treatment and lighting.

The total number and mix of apartments is set out in **Table 4** below.

Building Ref.	Studio	1 Bed Apartment	2 Bed Apartment	2 Bed Duplex Apartments	3 Bed Triplex Apartment	4 Bed Townhouse	Total
BG1	14	132	9	-	6	-	161
BG 2	0	74	76	-	-	-	150
BG 3	5	30	15	2	-	-	52
BG 4	0	15	34	-	-	-	49
BG 5	0	-	-	-	-	4	4
Total	19	251	134	2	6	4	416

TABLE 4 UNIT NUMBERS AND MIX

Three pedestrian access points are proposed to promote the principle of permeability. One pedestrian access is proposed from the South Circular Road, a second from Rehoboth Place and a third is proposed from Rehoboth Avenue. The internal road network has been designed to encourage lower speeds (30kph or less). These lower speeds will create an environment conducive to on-street cycling.

Entrance to the site for vehicular traffic will be via the South Circular Road along Rehoboth Place. Rehoboth Place will be widened to facilitate the safe passage of motorists and residents of Rehoboth Place. Exit for vehicular traffic on to the South Circular Road will be via the existing site access to the east of Rehoboth Place. The access to the basement will be to the south of Block BG2 as illustrated on the accompanying General Arrangement Plan Level 00 prepared by HJL Architects.

A comprehensive landscape scheme that is informed by its context both culturally, historically and geographically has been generated to maximise the sense of community, opportunities for interactions and engage with the locality. The perimeter landscape includes the retention of existing boundary walls where possible. Throughout the scheme a clear hierarchy of attractive and usable open spaces are created that respond to the needs of the residents. These vary in size, scale and programme such as children's play, exercise, open flexible space for residents to gather in all underpinned by the need to promote biodiversity and sustainable practices. Communal amenity space is located within residential courtyards and roof terraces (2,618 sq.m combined) with play and amenities such as BBQ and yoga lawns provided for. Public open space is distributed as a series of plazas and pocket spaces.

Foul water will discharge to the combined sewer within Donore Avenue at the north east corner of the Player Wills site and this is confirmed as acceptable by Irish Water. Foul wastewater discharge from the development will be as follows; Average – 2.22l/s. Peak – 6.78l/s.

Sustainable Drainage Systems (SuDS) measures are incorporated into the surface water management system. These include both intensive and extensive green roofs, blue roofs, interconnected tree pits, attenuation storage and petrol interceptors.

As part of the overall integrated Masterplan Drainage Strategy agreed with Dublin City Council's Drainage Planning Department, it is proposed to construct a dedicated storm water sewer (approx. 388m in length), to connect into the existing municipal storm water drainage network within Donore Avenue at the north east corner of the Player Wills site. Discharge rates, including 20% increase in flows due to climate change, will be as follows: 1Year ARI – 1.1l/s, 30Year ARI 10.8l/s, 100Year ARI 21.7l/s.

To facilitate a connection to the potable water supply, it is proposed to connect to the public watermain within the South Circular Road. Water demand for the proposed development is as follows; Average – 2.49l/s. Peak – 12.646l/s.

In terms of services, it is proposed to construct ESB substations to serve the development and back-up will be provided via a standby generator. Gas will be supplied via an existing main gas line located on South Circular Road.

Waste management facilities are proposed at basement and ground level. On the morning of collection, waste will be moved by the Management Company to facilitate pick-up by waste collection vehicles.

5.2 Development Overview

An overview of the key development statistics is provided in **Table 5** below.

Proposed Development	
Site Area	2.18 ha (gross) 1.53 ha (nett)
No. Units	416 no. units in 5 no. blocks, including: <ul style="list-style-type: none"> 412 no. apartments in 4 no. blocks (BG1, BG2, BG3 & BG4) 4 no. townhouses in BG5
Other Uses	<ul style="list-style-type: none"> Crèche (233 sq.m) Commercial (388sq.m) Tenant Amenity Facilities (812 sq.m)
Density	272 uph (nett)
Building Height	2 to 16 storeys
Unit Mix Summary	<ul style="list-style-type: none"> 19 no. studio apartments (5%) 251 no. 1 bedroom apartments (60%)

Proposed Development	
	<ul style="list-style-type: none"> • 136 no. 2 bedroom units including 134 no. apartments and 2 no. duplex apartments (33%) • 6 no. 3 bedroom triplex apartments (1%) • 4 no. 4 bedroom townhouses (1%)
Car Parking	<ul style="list-style-type: none"> • 106 no. resident spaces (basement) • 4 no. resident spaces for townhouses in BG5 • 12 no. podium level spaces • 15 no. visitor spaces (surface level) • 3 no. set down spaces for crèche and taxis
Bicycle Parking	<ul style="list-style-type: none"> • 543 no. long-stay spaces • 84 no. short stay visitor spaces
Dual Aspect Units	210 no. units (50%)
Communal Amenity Space	2,618 sq.m total including residential courtyards and roof terraces
Plot Ratio	2.1
Site Coverage	33%

TABLE 5 DEVELOPMENT OVERVIEW

Following in **Table 6** is a breakdown of the proposed development by block showing the number of units and building height.

Block	No. Units	Storeys	Max Building Height to parapet
BG1	161	5 to 11 storeys	57.250m
BG2	150	2 to 16 storeys	72.435m
BG3	52	3 to 5 storeys	38.725m
BG 4	49	3 to 4 storeys	34.800m
BG5	4	3 storeys	31.810m

TABLE 6 UNIT NUMBERS AND BUILDING HEIGHT BY BLOCK

5.3 Design Rationale

Key elements of the proposal are summarised as follows:

- **Enhanced Permeability** - The extensive public realm, particularly through the central node of the development, has been designed to promote pedestrian activity through the site and optimise connectivity with the surrounding street network. These spaces are intended to enhance permeability and enable future connections with the adjoining Masterplan lands.
- **Place-making** – The proposed redevelopment aims to create a sense of place through a range of measures including high quality urban design, a building height strategy that responds to the site's urban location and the provision of attractive, vibrant streets and public spaces.
- **Sustainability** – The proposed development is intended to promote active modes of travel and contribute to decreased reliance on private vehicles, maximising use of existing infrastructure. Energy efficiency will be promoted through the use of good quality external building materials and insulation, efficient heating systems, use of green roofs and sustainable water use and drainage design.

5.4 Proposed Commercial Uses

It is noted that on foot of the pre-application consultation meeting with An Bord Pleanála, a discussion took place on the extent of commercial uses proposed, given the extent of vacancy within the wider area. To address this matter, the application includes for a range of uses, see point (vi) in the development description.

The proposed class of uses 1, 2, 8, 10 and 11 are included to allow the Applicant flexibility to secure tenants without the need for a separate application for a change of use permission. In this way the viability of the proposed floor area is maximised.

A report prepared by CBRE confirms that the volume of floor area proposed for non-residential uses is appropriate for a development of the scale proposed and is appended to this Planning Statement. It is respectfully requested that any forthcoming grant of permission include a condition that provides for the range of non-residential uses proposed this application.

5.5 Open Space, Amenities and Services

The proposed development includes dedicated amenities and services. These are:

- Private resident services and amenities (812 sq.m GFA) incorporating; a concierge office in BG1; concierge and business centre, gymnasium, communal living / kitchen and residents lounge in BG2; residents lounge in BG3. Resident services and amenities are primarily concentrated in Block BG2 for the benefit of all future occupants of the scheme to promote social integration.
- Communal ancillary facilities for residents including secure long-stay covered bicycle stores and waste management facilities are provided;
- Communal open spaces (2,618 sq.m) in the form of courtyards at ground and podium level and rooftop terraces to enhance amenity and provide active and passive recreational opportunities;
- Neighbourhood level commercial areas (388 sq.m total) at ground floor level comprising a restaurant/café/bar (164 sq.m) and additional commercial floorspace (224 sq.m) to facilitate a range of uses including Class 1 (shop), Class 2 (financial/professional services), Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall) that will cater to local need generated within the development site and be available for the benefit of neighbouring residents; and
- A crèche is proposed (233sq.m) to respond to the child-care needs of the local resident population and will include an associated play area of 50 sq.m, with 3 no. set-down car parking spaces.

The open space strategy is consistent with the principles established in the Masterplan including;

- ✓ Providing generous, well designed, attractive, multifunctional public open space with good orientation, connectivity, and passive and active supervision.
- ✓ Defining the public realm and public and private open space.
- ✓ Using appropriate boundary treatments to define and secure private space.
- ✓ Developing a comprehensive soft landscaping strategy.

The proposed development creates a distinct and interactive public realm which will form connections between each of the blocks at street level and benefits from extensive landscaping.

Throughout the scheme a series of attractive and usable communal open spaces are created that will respond to the needs of residents, see **Figure 8**. These vary in size, scale and programme and have been designed to facilitate children's play, exercise and passive recreation where residents can interact, all underpinned by the need to promote biodiversity and sustainable practices.

The **Landscape Design Statement** accompanying this SHD application provides a more detailed description of the open space rationale.



FIGURE 8 SPATIAL DISTRIBUTION OF OPEN SPACE

In addition, the **Housing Quality Assessment** submitted with this application includes a comprehensive schedule of communal and private open space and amenity areas. The **Statement of Consistency with National, Regional and Section 28 Ministerial Guidelines**, prepared by McCutcheon Halley Planning, provides a detailed assessment of the open space and amenities / services, demonstrating the compliance of the scheme with the Design Standards for New Apartments Guidelines (2018).

6. National Planning Policy Context

This SHD application has been prepared against the backdrop of Project Ireland 2040 and the National Planning Framework (NPF) 2018. The NPF sets the targets and development strategy to cater for the estimated one million extra people that will be living in Ireland and the further two thirds of a million people who will be working in Ireland by 2040. Over the life of the plan, it is forecast that half a million additional homes will be needed to accommodate this projected growth.

The NPF's long-term vision aims to balance the provision of good quality housing that meets the needs of a diverse population by developing our cities, towns and villages as attractive places to live both now and in the future. The plan embraces the principle of compact growth, promoting development that is within the existing built-up footprint of settlements or contiguous to existing developed lands. The target is for at least 50% of all new housing to be delivered within the existing built-up areas of cities on infill and/or brownfield sites. These include vacant and under-occupied buildings, with high housing and job densities, better serviced by existing facilities and public transport.

In addition, Rebuilding Ireland was introduced in 2016 to respond to a significant shortage of housing in the country and so accelerate housing supply nationally. The plan aims to address the needs of homeless people and families in emergency accommodation, increase the provision of social housing, deliver more general needs housing by encouraging new construction, utilise vacant homes and improve the rental sector.

In conjunction with a suite of measures to address homelessness and improve government supports for households in need, Rebuilding Ireland seeks to increase the overall supply of new homes to 25,000 per annum by 2020. *Pillar 4* of Rebuilding Ireland aims to “*Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents*”.

This SHD application is accompanied by a detailed **Statement of Consistency** addressing the compliance of the proposed development with the relevant national and regional planning policies, including Section 28 Ministerial Guidelines. Compliance with the City Development Plan is set out in Section 7 of this report.

7. Compliance with Dublin City Development Plan 2016-2022

7.1 Principle of Development

7.1.1 Site Zoning

In accordance with the Dublin City Development Plan (DCDP) 2016-2022 the subject site straddles three land use zones. The eastern part of the site (6,044 sq.m) is zoned Z14 Strategic Development and Regeneration Area (SDRA) 12 - St. Teresa's Gardens and Environs. The aim of the Z14 Zoning Objective is *"To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and 'Z6' would be the predominant uses"*.

The western portion of the site (8,256 sq.m) is zoned Z4 - District Centre and adjoins the land designated as SDRA 12. The purpose of the Z4 Zoning Objective is to *"provide for and improve mixed-services facilities"*.

The portion of land in the north-west corner of the site (1,042 sq.m) is zoned Z1 Sustainable Residential Neighbourhoods. The aim of the Z1 Zoning Objective is *"To protect, provide and improve residential amenities"*.

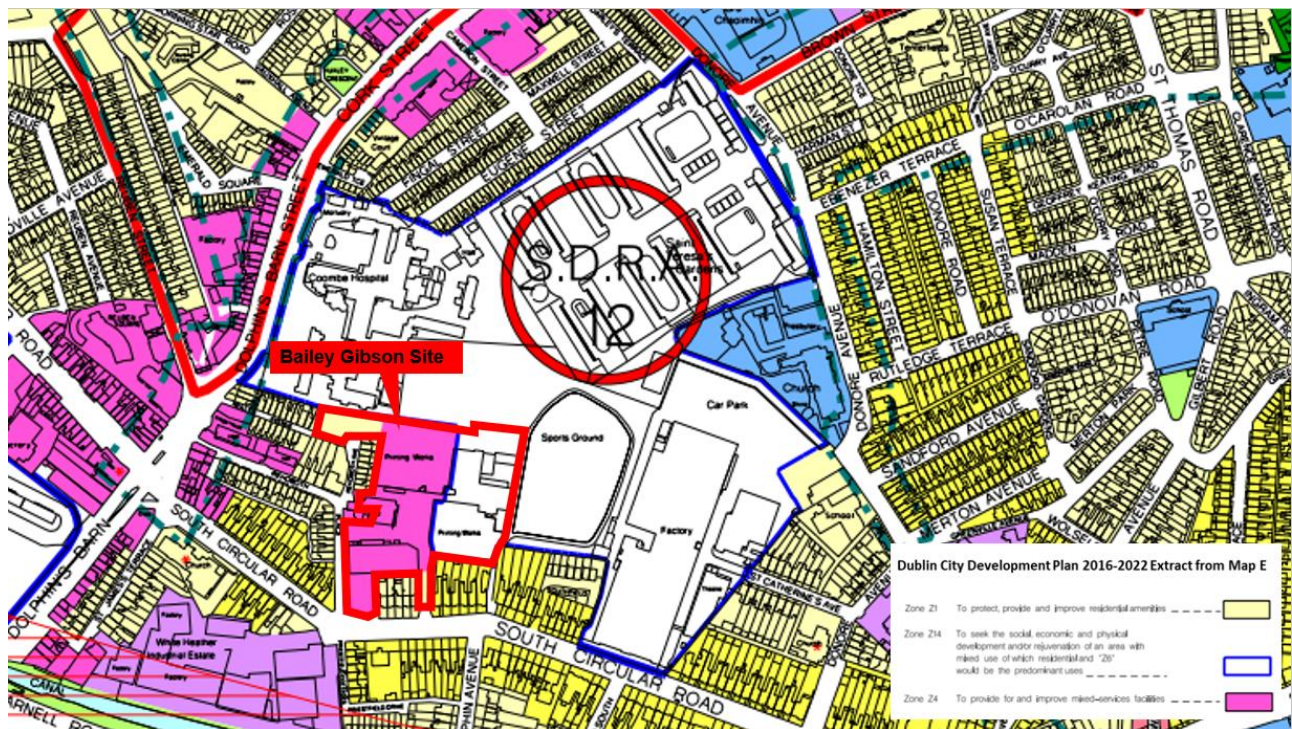


FIGURE 9 SITE ZONING

Figure 9 is taken from Map E of the Dublin City Development Plan 2016-2022 and identifies the Z1, Z4 and Z14 zoning of the subject site.

7.1.2 Zoning Objective Z1 – Sustainable Residential Neighbourhoods

Residential uses are identified as permissible, in principle, on lands zoned Z1. The City Development Plan vision is to provide for a wide range of residential accommodation within sustainable communities that benefits from access to services, open space and facilities such as shops, education, leisure, community facilities and amenities, public transport and employment opportunities.

Proposed Block BG5 which contains 4 no. 4-bedroom townhouses is situated within that portion of the site zoned Z1. Whilst it is only a small part of the overall development planned for the Bailey Gibson site, it will benefit from the site wide provision of open spaces, tenant amenities and supporting commercial elements

that extend across the lands zoned Z4 and Z14. In terms of the wider context, as described in detail in Section 2 of this report and the accompanying SIA, residential accommodation at this site will also benefit from an extensive array of social infrastructure and a high level of connectivity, consistent with the City Council vision for sustainable residential development.

7.1.3 Zoning Objective Z4 - District Centre

Residential uses are deemed permissible, in principle, under Zoning Objective Z4 - District Centre. Additionally, the proposed non-residential elements of the scheme are also permissible, in principle, on lands zoned Z4, and will contribute to a mix of uses that will serve the needs of local residents.

Following in **Table 7** is a list of permissible uses on Z4 lands, in accordance with Section 14.8.4 of the City Development Plan:

Zoning Objective Z4
Permissible Uses
Amusement/leisure complex, bed and breakfast, betting office, buildings for the health, safety and welfare of the public; car park, car trading, childcare facility, civic offices, community facility, cultural/ recreational building and uses, delicatessen, education, embassy office, enterprise centre, garden centre, guest house, halting site, home-based economic activity, hostel, hotel, industry (light), live work units, media-associated uses, medical and related consultants, motor sales showroom, office (max. 600 sq m.), off-licence, open space, park and ride facility, part off-licence, petrol station, place of public worship, public house, residential, restaurant, science and technology-based industry, shop (district), shop (neighbourhood), take-away, training centre.

TABLE 7 PERMISSIBLE USES IN Z4 ZONING OBJECTIVE, DCDP 2016-2022

Thus, the full range of uses proposed within the proposed Bailey Gibson redevelopment comprising;

- 416 no. residential units
- resident services and amenities (812 sq.m) incorporating a gymnasium, business centre, entertainment areas and concierge office
- commercial floor space (388 sq.m) incorporating a restaurant/café/bar (164 sq.m) and 224 sq.m to facilitate Class 1 (shop), Class 2 (financial/professional services), Class 8 (health services), Class 10 (community/arts) and Class 11 (bingo hall) uses, and
- crèche (233sq.m)

are permissible within the Z4 zoning objective. It is noted that the western part of the site zoned Z4 contains Blocks BG1 and BG4 only. Block BG1 incorporates 224 sq.m of ground level commercial floor space to facilitate a range of Class 1, 2, 8, 10 and 11 uses, together with the crèche, residential apartments and associated tenant amenity spaces. BG4 has been designed exclusively to accommodate residential apartments and communal open space but all these units will enjoy access to the full range of supporting amenities/services.

Whilst identifying Z4 District Centre lands as appropriate for a mix of uses, the City Development Plan does not preclude predominantly residential development on such sites by specifying the extent or quantum of 'other' uses which should be achieved. Section 14.8.4 states:

"To maintain their role as district centres, new development should enhance their attractiveness and safety for pedestrians and a diversity of uses should be promoted to maintain their vitality throughout the day and evening. In this regard, opportunity should be taken to use the levels above ground level for additional commercial/retail/ services or residential use with appropriate social facilities."

The proposed Bailey Gibson development aligns with these aims, as follows:

- to enhance the attractiveness and safety for pedestrians by;
 - providing for substantial improvements to the site's legibility and permeability

- widening and upgrade of Rehoboth Place to facilitate the safe passage of motorists and residents
 - prioritising pedestrian activity through the site and provision of 3 no. pedestrian access points, and
 - creating attractive new public realm areas
- the proposed redevelopment will increase the *diversity of uses* by creating a vibrant new high density residential neighbourhood, complemented by additional commercial, crèche and supporting tenant amenities that will promote *activity day and evening* and therefore ensure substantial improvements to secure *vitality* at this derelict / under-utilised former industrial site;
 - careful consideration has been given to the location of different uses within the wider Bailey Gibson site;
 - ground floor own-door units will optimise activity and passive surveillance opportunities at street level
 - ground floor crèche and commercial uses are concentrated at key nodes within the site to generate activity, create a sense of community and promote social interaction
 - provision of tenant amenities including the gymnasium, co-working spaces and concierge offices at ground floor level will further contribute to vitality and activity at all times of the day and evening
 - residential units above ground floor will enhance security by enabling passive surveillance and overlooking of local streets and public realm areas

The City Development Plan identifies key district centres as having the capacity to deliver a “*viable retail and commercial core*” but district centres, including the subject site, are regarded as a lower tier within the Dublin City retail hierarchy, intended to serve local community need.

Section 3.7 of the Dublin City Retail Strategy (Appendix 3 of the City Development Plan) provides guidance on the scale and location of development and indicates:

*“It is essential that **new retail floor-space is appropriately located in order to maintain the vitality and viability of existing and permitted centres**, to avail of improved public transport access and to cater for population growth areas.”* (emp. added)

CBRE were engaged by the Applicant to consider the viability of potential retail provision within the proposed development and having regard to existing retail provision in the vicinity of the subject site. Their response is included at **Appendix 1** and concludes that “*the volume of retail provision within the proposed scheme is appropriate for a residential development of the scale proposed.*”

The Applicant has therefore provided for a mix of uses at this site which will maintain the vitality and viability of the existing centre at Dolphin’s Barn, identified as SDRA 18 and located in close proximity, being c.260m from the subject site. Several convenience retail outlets have also been identified within the 1km buffer zone in the accompanying **Social Infrastructure Audit** and these include a number of smaller shops, a Tesco Express and Lidl supermarket.

A number of retail outlets are presently located on Cork Street and a report from Dublin City Council on the regeneration of the Cork Street area identify it as a planned centre, designating it a civic and commercial hub. The close proximity of Cork Street to the subject site will ensure it becomes an important retail and service centre for the new resident population.

Further, the Applicant has worked in close conjunction with Dublin City Council to produce a non-statutory Masterplan which accompanies this application and encompasses the Bailey Gibson site and Player Wills site

to the east, connected by lands in the ownership of the City Council. The Masterplan prepared designates the Player Wills site as a more suitable location within the wider lands to concentrate 'other' (non-residential) uses due to its locational advantages and relationship with the surrounding network of streets and existing development.

It is therefore evident that the proposed residential led development is permissible within the Z4 zoning objective. In addition, the provision of a modest quantum of commercial and other supporting uses is consistent with the overarching objectives of the City Development Plan to maintain a clear retail hierarchy that preserves the viability and integrity of both existing and planned centres.

7.1.4 Zoning Objective Z14 – Strategic Development and Regeneration Area

In respect of the portion of the site zoned Z14 Strategic Development and Regeneration Area, the proposed uses are permissible, in principle. Following in **Table 8** is a list of permissible uses on Z14 lands, in accordance with Section 14.8.4 of the City Development Plan:

Zoning Objective Z14
Permissible Uses
Betting office, buildings for the health, safety and welfare of the public; childcare facility, community facility, conference centre, cultural/recreational building and uses, education, embassy office, embassy residential, enterprise centre, green/clean industries, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, offices, open space, park and ride facility, part off-licence, place of public worship, public service installation, residential, restaurant, science and technology-based industry, shop (neighbourhood), training centre.

TABLE 8 PERMISSIBLE USES IN Z14 ZONING OBJECTIVE, DCDP 2016-2022

Having regard to the full range of permissible uses on Z14 lands, all uses proposed within the Bailey Gibson redevelopment on this part of the site are permitted, in principle. Proposed Blocks BG2 and BG3 are situated within the Z14 portion of the site, comprising residential apartments, tenant amenities (incorporating a gymnasium, business centre, entertainment areas and a concierge office concentrated in Block BG2), crèche, and restaurant/café/bar, also within Block BG2.

In respect of Strategic Development and Regeneration Areas, Section 3.7 of the Retail Strategy for Dublin City states:

*“where large areas of new housing are planned that **new retail centres** are provided in tandem with housing, **at a scale appropriate** to meet the regular convenience and lower order comparison shopping needs of these communities.”* (emp. added)

Thus, the Retail Strategy endorses a flexible approach to the development of new retail centres such as the Bailey Gibson site that is viable and commensurate with the level of need.

It must also be highlighted that the portion of the Bailey Gibson site zoned Z14, comprises only a small portion of SDRA 12 and therefore cannot be considered in isolation but within the wider context of the surrounding SDRA lands. In this regard, the proposed commercial floor space within Blocks BG1 and BG2 will serve the needs of local residents, further supported by the range of existing retail and commercial services located in the surrounding area, including Dolphin's Barn and Cork Street.

The proposed development at the Bailey Gibson site incorporating a residential Built to Rent scheme with supporting tenant amenities and services, commercial floor space and crèche facility are all land uses which will ensure the achievement of the overarching objectives seeking rejuvenation and regeneration of the SDRA 12 lands, as detailed in the Development Framework for St Teresa's Gardens and Environs (2017), in particular, to:

- Deliver a mixed-use quarter with significant capacity for high quality residential accommodation and complementary uses;
- Promote a mix of tenure and unit types;
- Provide a development that is responsive to its local context and surrounding residential uses;
- Clearly define the public realm through the use and appropriate layout of buildings;
- Promote active street frontages and prioritise pedestrian activity through the quarter;
- Establish a network of streets and public spaces to ensure the social and economic integration of St. Teresa's Gardens with Player Wills and Bailey Gibson sites and surrounding area; and
- Create strong permeability through these lands between Dolphin's Barn and Cork Street and connecting Cork Street and Donore Avenue with South Circular Road and the Grand Canal Corridor, particularly for pedestrians and cyclists.

The proposed development will meet these objectives by creating a vibrant and sustainable new urban neighbourhood which has been carefully designed to integrate with the wider SDRA lands. This residential led scheme ensures a more efficient use of these lands and will significantly contribute to the revitalisation and rejuvenation of the area, fulfilling the purpose of the Z14 Zoning Objective.

Whilst it is noted that the Z14 zoning objective aims to provide for additional mixed uses, it is reiterated that the scheme was designed as part of a wider Masterplan that aims to create a community hub within the newly developed SDRA 12 site, providing a range of supporting commercial, community and recreational facilities to serve the needs of the future resident population and the local neighbourhood. The predominantly residential aspect of the current scheme was the outcome of this strategic master-planning process undertaken by the applicant in conjunction with Dublin City Council for the SDRA 12 lands.

In close consultation with the City Council, it was agreed that the Player Wills site to the east which forms part of the Applicant's landbank and is included within the Masterplan site, is a better location for a more intensive mixed-use development where a greater number of retail, commercial and community uses could be concentrated for the benefit of the established community and future residents. The redevelopment of the Player Wills site, including the provision of additional mixed-uses in accordance with the adopted Masterplan, will be addressed by the Applicant in a subsequent application.

7.1.5 Conclusion

The type and quantum of uses proposed for the Bailey Gibson site comply with the Z1, Z4 and Z14 Zoning Objectives, as all proposed uses within this residential led scheme are permissible, in principle, in the respective zones as described above. The type and quantum of uses proposed has not been treated in isolation but has evolved in response to the master-planning exercise and careful consideration of the site context and site specific matters. Furthermore, Cork Street to the north-west has been designated as a future commercial and community hub and therefore the integrity of this location for such purposes will take precedence. The accompanying **Social Infrastructure Audit** also indicates that the locality enjoys access to a wide range of commercial, retail, and community facilities.

The successful regeneration of this area shall be reliant upon the delivery of high quality, viable development of sufficient scale to boost the local population and respond to local conditions. The high-density residential nature of the scheme will ensure the ongoing viability of local public transport services and build on the existing population base to support surrounding retail and commercial uses. The subject site been derelict / under-utilised for a significant length of time and although some mixed uses are proposed, it is considered that there are already a significant number of existing retail uses in the vicinity, as detailed in the accompanying Social Infrastructure Audit.

Through the creation of a complementary strategy for the development of the SDRA 12 lands, the applicant has the capacity to deliver a more effective, efficient use of the subject site, consistent with the overarching

aim to regenerate this area. This complementary strategy will enable an integrated approach to development of the wider regeneration site that benefits from public realm improvements, enhanced permeability for pedestrians and cyclists and an integrated network of green infrastructure.

It is considered that this application for a predominantly residential scheme provides a significant opportunity to realise the Development Plan objectives for revitalisation and regeneration in this locality. This proposal to increase residential densities in this central and accessible location is also consistent with current national planning policy, particularly with respect to consolidation and compact growth objectives.

7.2 Height, Scale and Design

The building height strategy has evolved to respond sensitively to the surrounding streetscape and established residential character, whilst optimising opportunities for densification at this urban brownfield site. The proposed development will comprise 5 no. residential blocks (BG1, BG2, BG3, BG4 and BG5) ranging in height from two to sixteen storeys.

The Masterplan building height rationale sets out to *'develop sensitively and at an appropriate scale at the interface of the SDRA lands with surrounding existing residential units. Increase the scale of development as appropriate towards the centre of the land block'*. This proposal adheres to this key principle ensuring that the massing and scale of the project relates to the existing Dublin 8 neighbourhood. Furthermore, the proposed massing considers factors such as high levels of daylight and sunlight, access to the scheme, creating a pedestrian priority and friendly environment whilst making the best of the opportunity to deliver a scheme which maximises the site's potential.

Perimeter blocks adjacent to existing dwellings will be at an appropriate scale of three to four storeys and building heights will rise towards the central and northern parts of the site, increasing at the interface with the Masterplan lands. For added emphasis, parapets adjacent to street nodes are increased locally, informing the urban realm and creating a smaller scale at the skyline level.

A human scale is reinforced at street level through active frontages, double-height where retail/community uses are place; through height transitions to existing streets and neighbouring dwellings; and through comprehensive high-quality detailing to the streetscape, including street trees and shrub planting, generous pavements, cycle parking and seating.

There are two tall buildings, BG1 includes an eleven storey element of 57.25m and BG2 includes a sixteen storey building of 72.435m. These taller elements are located in the centre and north-east quadrant of the site so as not to adversely impact neighbouring residential properties or have an overbearing presence along the existing streetscape.

The increased scale in blocks BG1 and BG2 gives structure and form to the principal spaces and vistas. The increased height creates a gateway to the Masterplan lands and BG2 flanks and encloses the central park proposed in the Masterplan.

Textured brick panels will be used throughout the development to create a sense of scale through definition of the podium level and articulation of the facade fenestration. This articulation will help to break down the scale of the buildings and reflect domestic proportions. The architectural treatment of these elements has been designed to create a sense of identity within the overall scheme while responding to the distinctive quality of the surrounding neighbourhood.

A palette of quality, durable materials are proposed for the external facades. Materials have been selected for their suitability to the local environment, ability to provide variety in terms of colour, texture and tone, and their appropriateness to the building use. For sustainability, materials for the courtyards have been chosen which

are substantially maintenance-free in order to ensure that the buildings weather well without extensive maintenance regimes.

The **Daylight, Sunlight and Overshadowing Study** submitted under separate cover concludes that there is minimal overshadowing from the proposed Bailey Gibson development due to the considered architecture along the west side (along Rehoboth Place/Avenue) where the potential for overshadowing to existing buildings is greatest. This is categorised as a minor adverse impact under the BRE recommendations.

According to the BRE's Site Layout Planning for Daylight and Sunlight for a space to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on the 21st of March. The assessment submitted with this application demonstrates that on the 21st of March, all of the proposed amenity areas would receive at least 2 hours of sunlight and all areas exceed the BRE recommendations with individual amenity spaces ranging from 53% to 100%.

An average daylight factor (ADF) assessment has been undertaken and 101 no. 'worst case' locations have been tested. The analysis demonstrates that 96% of the proposed rooms tested are achieving ADFs above the BRE guidelines. This percentage across the scheme would be expected to increase further if all of the upper rooms were included in the results.

The proposed redevelopment of the Bailey Gibson site will be part of a much wider change to the urban landscape of the Masterplan area. The **Landscape and Visual Impact Assessment** (LVIA) that accompanies this application under separate cover states;

*"Within the context of the wider Masterplan Area landscape, the proposed Bailey Gibson development will make a **moderate and positive contribution** to this new urban neighbourhood. Impacts upon the surrounding urban landscape will also be moderately positive, replacing an abandoned industrial premises with an attractive residential environment.*

The taller blocks BG1 and BG2 give structure and form to the development, helping to define its core and creating a gateway into the site from the west (via Rehoboth Place) and from the south (via South Circular Road). The scale of these blocks is broken down by façade recesses and the pattern/layout of window openings, creating a slender vertical emphasis at the same time."

A suite of photomontages is submitted in support of this application and the LVIA assesses the impact of the proposed development on those views. Critically, the assessment concludes that the impact will range from neutral to major positive and no likely significant negative impacts are predicted.

The *Urban Development and Building Height Guidelines* (2018) advocate a performance based evaluation of schemes where increased building height is proposed. The supporting information included with this application confirms that the proposed development of the Bailey Gibson site will;

- ✓ Successfully integrate into and enhance the character and the public realm of the area;
- ✓ Make a positive contribution to place making incorporating new streets and public spaces, with a variety of scale and form that responds to the scale of existing and future master-planned developments;
- ✓ Make a positive contribution to the improvement of legibility through the site and into the wider Masterplan lands; and,
- ✓ Protect the amenity of adjoining land uses and maximises access to natural daylight and sunlight within the proposed units and in communal amenity areas.

It is noted that the height of the two taller buildings exceed the Development Plan threshold for SDRA 12 which is identified as an appropriate site for the location of one or two mid-rise buildings up to 50m. However, the building height rationale has been advanced in close consultation with Dublin City Council as part of the Masterplan process and in response to national planning objectives.

It is considered that the proposed development will be of high quality design, having a lasting positive impact on the new identity of the area. The approach to height and scale will further ensure the sustainable use of this brownfield site and the achievement of more compact urban development.

The approach to height and scale for the proposed development has also been underpinned by the strategic urban location of the subject site and the Z14 Zoning Objective which aims to secure the regeneration and rejuvenation at the site and adjoining lands. Redevelopment of the Bailey Gibson site presents a unique opportunity to facilitate a much needed large-scale housing project near the centre of Dublin, close to where people work.

Please refer to the accompanying **Material Contravention Statement**, **Architectural Design Statement** and **Statement of Consistency with National, Regional and Section 28 Ministerial Guidelines**, submitted under separate cover, which address this matter in further detail and include an assessment of the scheme against the relevant performance criteria for taller buildings detailed in national planning policies and the City Development Plan.

7.3 Standards for Residential Accommodation

Section 16.10.1 of the City Development Plan sets out the standards for apartment developments, having regard to the *Design Standards for New Apartments Guidelines* (2015). These guidelines were subsequently updated by the Minister and are superseded by 2018 Guidelines.

The **Housing Quality Assessment** prepared by Henry J Lyons and submitted under separate cover details the compliance of the proposal with the relevant requirements of the 2018 Guidelines.

Following in **Table 9** is a summary of the key development parameters, measured against the relevant requirements (with reference to the 2018 Guidelines where these supersede the City Development Plan).

Residential Quality Standard	Relevant Requirement	Bailey Gibson Development	Notes	Complies
Minimum Floor Areas	<ul style="list-style-type: none"> Studio – 37 sq.m 1 Bed (2 Person) – 45 sq.m 2 Bed (4 Person) – 73 sq.m 3 Bed (5 Person) – 90 sq.m <p>Majority of units in any scheme with 10 or more apartments shall exceed the minimum floor area standard by 10%.</p>	All units within the proposed development comply with the minimum floor area requirements for 1, 2 and 3 bed apartments, see HQA for full details.	In accordance with SPPR 8(iv) of the 2018 Guidelines, Build to Rent schemes are excepted from the requirement to exceed the minimum floor area by 10% in majority of apartments.	✓
Mix of Units	<ul style="list-style-type: none"> Max. of 50% Studio and 1 Bed units (no more than 25% studio) 	<ul style="list-style-type: none"> 19 no. studio apartments (5%) 251 no. 1 bedroom apartments (60%) 136 no. 2 bedroom units including 134 no. apartments and 2 no. duplex apartments (33%) 	<p>In accordance with SPPR 8(i) of the 2018 Guidelines, there are no restrictions on dwelling mix for BTR developments.</p> <p>A detailed rationale for the proposed unit mix is provided in Section 8</p>	✓

Residential Quality Standard	Relevant Requirement	Bailey Gibson Development	Notes	Complies
		<ul style="list-style-type: none"> 6 no. 3 bedroom triplex apartments (1%) 4 no. 4 bedroom townhouses (1%) 	of this Planning Statement.	
Aspect, Natural Lighting, Ventilation and Sunlight Penetration	<ul style="list-style-type: none"> Internal access to daylight, as per BRE guidelines Min. 33% dual aspect units in more central and accessible urban locations 2.7m min. ceiling heights at ground floor 2.4m min. ceiling heights above ground level 	<p>A Sunlight, Daylight and Overshadowing Assessment, prepared by IES, provides a detailed analysis of the scheme indicating 96% of the spaces tested have an ADF above the recommended values in line with the BRE guidelines.</p> <p>210 no. units within the scheme are dual aspect, achieving an overall rate of 50%.</p> <p>Floor to ceiling heights at ground level and above comply with minimum standards.</p>	The subject site is located within a central and accessible urban location. The development exceeds the minimum requirement for dual aspect units.	✓
Block Configuration	Max. 12 units per core per floor, subject to compliance with the dual aspect ratios and with building regulations.	The proposed development does not exceed 12 units per core per floor.	In accordance with SPPR 8(v) of the 2018 Guidelines, the requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.	✓
Entrance Lobbies, Circulation and Safety	<ul style="list-style-type: none"> Maximise natural surveillance of streets, open spaces, public realm, surface parking Lobbies and entrances should be spacious, orientate visitors, highly visible from adjoining dwellings, large enough to facilitate furniture deliveries 	<ul style="list-style-type: none"> Lobbies and concierge areas are located centrally, principally around the central nodes and public realm to optimise activity and enable active and passive surveillance opportunities at street level. Lobbies and entrances are spacious, highly visible from the street and adjoining development and of sufficient size to accommodate furniture deliveries. 	Refer to HJL Architects Design Statement, Drawings and HQA for further details.	✓
Internal Space Configuration for Apartments	<ul style="list-style-type: none"> Min. aggregate floor areas for living / dining / kitchen Min. widths for main living / dining room Min. bedroom floor areas / widths 	The proposed development satisfies, and where possible exceeds the minimum standards.	The HQA provides a full overview for the development, demonstrating compliance with the standards contained in Appendix 1 of the 2018 Guidelines.	✓

Residential Quality Standard	Relevant Requirement	Bailey Gibson Development	Notes	Complies
	<ul style="list-style-type: none"> Min. aggregate bedroom floor areas 			
Storage	Min. Storage required; <ul style="list-style-type: none"> Studio - 3 sq.m 1 bed unit - 3 sq.m 2 bed (2P) unit - 6 sq.m 3 + bed unit - 9 sq.m 	The proposed development satisfies the minimum standards.	In accordance with SPPR 8(ii) of the 2018 Guidelines, flexibility shall apply in relation to the provision of a proportion of the storage associated with individual units as set out in the 2018 Guidelines. The HQA demonstrates compliance with the 2018 Guidelines.	✓
Private Open Space	Minimum floor areas for private amenity space; <ul style="list-style-type: none"> Studio - 4 sq.m 1 bed - 5 sq.m 2 bed (4 P) - 7 sq.m 3 bed - 9 sq.m 	All units comply with the minimum requirements. Above ground level, private amenity spaces are provided in the form of semi-recessed glass balconies while the majority of ground floor apartments have an outdoor terrace. In their opinion to ABP at PAC stage, DCC noted that the balcony of apartment no. 102A at Level 01 (first floor) of BG3 is c.3m from the rear boundary and c.8.5m from the rear return of 322 South Circular Road. In response to this matter, the proposal provides for 1.8m high screening to alleviate any potential overlooking concerns.	In accordance with SPPR 8(ii) of the 2018 Guidelines, flexibility shall apply in relation to the provision of private amenity space associated with individual units as set out in Appendix 1, subject to provision of compensatory communal support facilities. The HQA demonstrates compliance with the 2018 Guidelines.	✓
Communal Open Space	Minimum communal amenity / open space; <ul style="list-style-type: none"> Studio - 4 sq.m 1 bed - 5 sq.m 2 bed (2P) - 7 sq.m 3 bed - 9 sq.m Based on above, the requirement for each block is; <ul style="list-style-type: none"> BG 1 – 833 sq.m BG2 – 902 sq.m BG3 – 293 sq.m BG 4 – 313 sq.m 	The proposed development complies with the minimum communal open space requirements generated for each block, as follows; <ul style="list-style-type: none"> BG1 – 834 sq.m BG2 – 926 sq.m BG3 – 545 sq.m BG4 – 313 sq.m 	The proposed development satisfies, and where possible exceeds the minimum standards.	✓
Communal Facilities	Larger developments may provide community or meeting rooms, laundry rooms etc. which are accessible to residents only. Other communal facilities such	Tenant amenity spaces are included within the development; <ul style="list-style-type: none"> concierge areas co-working space gymnasium 	Refer to the Architects Design Statement for full details of the proposed tenant amenity spaces and support facilities in accordance with SPPR	

Residential Quality Standard	Relevant Requirement	Bailey Gibson Development	Notes	Complies
	as childcare or gym use could be open to non-residents.	<ul style="list-style-type: none"> communal living / kitchen resident's lounges <p>The scheme also includes a crèche which will be accessible to surrounding residents.</p>	7(b) of the 2018 Guidelines.	✓

TABLE 9 COMPLIANCE WITH RELEVANT DEVELOPMENT STANDARDS FOR APARTMENTS

7.4 Public Open Space

Section 16.3.4 of the City Development Plan requires that all residential schemes identified in Section 16.10.1 provide 10% of the site area as public open space to “*progress the city’s green infrastructure network, improve biodiversity, and expand the choice of public spaces available*”.

The proposed development does not provide for public open space within the bounds of the application area. The Masterplan agreed with Dublin City Council includes an integrated open space and landscape strategy for the wider area that encompasses SDRA 12 – St Teresa’s Gardens and Environs.

The agreed Masterplan provides for extensive public open spaces that include a central square situated between the Bailey Gibson site and the Player Will site to the east, as well as an extensive area of public open space that includes a full size GAA pitch in the northern part of the Masterplan lands, see **Figure 10**.



FIGURE 10 SDRA 12 MASTERPLAN - KEY OPEN SPACES

The Masterplan open space strategy also incorporates public open space within the Player Wills site and collectively, the planned public open spaces will be complemented by communal open spaces predominantly in the form of courtyards and roof terraces distributed throughout each of the development sites.

In addition, the agreed Masterplan incorporates children's play spaces which will be provided in close proximity to the site, including within the central square situated immediately adjoining the Bailey Gibson site, with a further playground to be provided at the Player Wills site, adjacent to Block PW2.

The Applicant has engaged with Dublin City Council regarding the delivery of public open space within the wider SDRA lands under their control. In response to these discussions, public open spaces will be delivered on the Player Will site that will benefit the proposed development and will be subject of forthcoming SHD applications.

7.5 Sustainable Residential Areas

7.5.1 Residential Unit Mix

The subject site has the capacity to make a substantial contribution to the provision of new residential stock in an accessible location, well served by public transport and social infrastructure. Redevelopment of the site will also deliver a mix of uses to meet the needs of the wider community and realise local and national planning objectives.

The proposed unit mix has evolved following extensive consultation with Dublin City Council and is fully endorsed by national planning policies. It is also a direct response to the significant market demand within the private rental sector, particularly in this part of Dublin City. The total number and mix of apartments is set out in **Table 10**.

Building Ref.	Studio	1 Bed Apartment	2 Bed Apartment	2 Bed Duplex Apartments	3 Bed Triplex Apartment	4 Bed Townhouse	Total
BG 1	14	132	9	-	6	-	161
BG 2	0	74	76	-	-	-	150
BG 3	5	30	15	2	-	-	52
BG 4	0	15	34	-	-	-	49
BG 5	0	-	-	-	-	4	4
Total	19	251	134	2	6	4	416
Mix %	5	60	33		1	1	416

TABLE 10 PROPOSED UNITS & Mix

A detailed rationale for the proposed unit mix is provided in Section 8 of this report based on a comprehensive examination of the existing housing stock, demographic trends and employment profile for the subject site and locality.

It is imperative that the supply of rental accommodation in Dublin better reflect the needs of the housing market, a critical requirement to ensuring Ireland's strategic competitiveness. Provision for housing need should also be undertaken in cognisance of the development viability, consistent with the available evidence, as stipulated in the Design Standards for New Apartments Guidelines (2018).

7.5.2 Density

The nett density of the proposed scheme is calculated on the area of land that is under the control of the Applicant i.e. 1.53 hectares which excludes the 0.646 hectares included in the application area to accommodate works that will facilitate connections to municipal services and works proposed to public roads. The proposed development will deliver 416 no. BTR residential units at a nett density of 272 units per hectare (uph). This level of density is considered appropriate for the Z4 District Centre and Z14 Strategic Development and Regeneration Area zoning objectives which have underpinned the development strategy for this site. The scheme has also evolved in response to the wider Masterplan for the SDRA 12 lands as it will further promote *"the social, economic and physical development and/or rejuvenation"* of the area.

The objective to achieve higher densities in appropriate urban locations within Dublin, is articulated in Section 4.5.3.1 of the City Development Plan:

“Higher densities will be promoted in the city centre, within KDCs, SDRAs and within the catchment of high capacity public transport. The density standards set out in this plan will promote the development of high quality, sustainable densities and the consolidation of urban form.”

The location of the site close to public transport links including Fatima LUAS stop c.800m to the north-west (walk time less than 10 minutes), South Clondalkin QBC along Cork Street / Dolphin's Barn Street c.200m to the west (2-4 minute walk) and additional urban bus services on the South Circular Road ensure that the site is well connected. This level of accessibility coupled with the site's location within SDRA 12 and c.2.3km from the city centre are consistent with the objective in Section 4.5.3.1 of the City Development Plan regarding suitable urban locations for higher densities.

The proposed development accords with the City Development Plan policies regarding density, principally:

“SC 13: *To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.”*

Thus, whilst the City Development Plan does not contain specific density standards for development, higher density development is explicitly supported, subject to the satisfaction of relevant performance criteria and design considerations. Other numerical standards relating to plot ratio and site coverage will have a bearing on the density achieved within a development site.

The current application satisfies the relevant policies of the City Development Plan for Sustainable Residential Areas, detailed in Section 5.5.2, as follows:

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

The current shortfall in housing provision is well documented and successive national planning policies including Rebuilding Ireland (2016) and the National Planning Framework (2018) reflect the Irish Government's commitment to addressing this matter. Against this backdrop, the current SHD proposal includes a substantial quantum of residential units that will deliver much needed housing in a mix of units that respond to the needs of the local population and workforce.

A Masterplan Document is submitted under separate cover. It reflects the strategic approach which has been adopted to ensure that redevelopment of this site is undertaken in a coordinated manner. High quality design has been embraced to ensure that the proposed development responds to the site's established residential setting and urban context. The scheme will deliver a high density residential development at a key under-utilised location that is appropriately zoned and has been identified for regeneration under the City Development Plan (SDRA 12).

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

This SHD proposal will create a sustainable new community by providing a range of unit typologies that cater to the needs of residents and the local workforce. The mix of unit types proposed is consistent with the aims of the DCC Housing Strategy, particularly having regard for the continued trend toward smaller household sizes which is reflected in the specific housing needs of this Dublin 8 community where there is sustained and significant demand for predominantly 1-bedroom, and to a lesser extent, 2-bedroom apartments. The inclusion of Part V units within the scheme will further address housing need and ensure a balanced social mix.

The proposed residential scheme reflects a sustainable approach to housing provision whereby current housing demands are met, with the opportunity for studio and 1-bedroom units, in particular, to be adapted/amalgamated in the future to respond to changing market conditions and household needs.

The scheme incorporates a range of resident amenities (812 sq.m), communal open space (2,618 sq.m) and commercial uses (388 sq.m) designed to create opportunities for social interaction and integration of the resident population.

High standards of urban design, quality public realm and amenity spaces will all contribute to the creation of a vibrant and sustainable new urban quarter with a unique identity and sense of place. Future delivery of the balance of the Masterplan development incorporating City Council lands and the Player Wills site will ensure additional retail/commercial, community and recreational facilities are provided to fulfil the overarching regeneration objectives for SDRA 12 in an integrated and cohesive manner to address the needs of the future resident population, as well as the wider community.

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

The subject site is situated in close proximity to high capacity and high frequency public transport services, in a central urban location earmarked for regeneration. These conditions necessitate the delivery of high density development at this site to comply with the consolidation and sustainability objectives of the City Development Plan.

As demonstrated in the accompanying **Architects Design Statement** and **Masterplan** documents, the highest standards of architecture have been embraced within the scheme. The design of buildings has been underpinned by core principles of legibility and visual coherence, visual variety and durability with respect to their external appearance. The overall scheme has been designed to respond to the site context and integrate with surrounding development through the provision of quality public realm and open spaces, as well as enhanced connectivity and permeability.

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

The subject site is recognised within Section 15.1.1.15 of the City Development Plan as having potential for the provision of much needed high-density living space. In its current form, the subject site is significantly under-utilised and so presents a considerable opportunity to achieve a high density residential development in this central and accessible urban location. This former industrial site in a prominent urban location has enabled a unique design process that embraces innovative solutions to permeability, form, height and open space and will ensure the creation of an integrated, sustainable new community.

- *QH9 - To require that larger schemes which will be developed over a considerable period of time are developed in accordance with an agreed phasing programme to ensure that suitable physical, social and community infrastructure is provided in tandem with the residential development and that substantial infrastructure is available to initial occupiers.*

The phasing plan has been developed to enable a programme of construction that responds to the constraints of this urban infill site, minimise disruption to the local community and ensure that the delivery of services and amenities meets the needs of new residents.

Please refer to Section 4 and Appendix B of the accompanying **Construction Management Plan** prepared by Garland and submitted under separate cover which provides a full overview of the proposed construction schedule and phasing programme. It details 9 no. construction phases and includes a description of proposed works to be undertaken, the approximate duration of each phase and drawings for each of the phases.

- *QH10 - To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities.*

The principles of connectivity, permeability and legibility are fundamental to the design approach for the Bailey Gibson redevelopment. These design principles are articulated in detail in the accompanying **Architects Design Statement** and **Masterplan** documents which set out how the scheme has evolved to assimilate with the surrounding urban environment and established resident population, creating a cohesive, integrated and inclusive new community.

- *QH11 - To ensure new developments and refurbishments are designed to promote safety and security and avoid anti-social behaviour in accordance with the Safety and Security Design Guidelines contained in Appendix 14.*

This SHD proposal has been designed to promote activity and movement through a network of shared street spaces and so provide a safe and secure environment for residents. The perimeter block system has been developed to clearly delineate public and private areas and ensure legibility so that there is a clear function and purpose to the buildings and spaces. In addition, own door units will be located at ground level to optimise passive surveillance opportunities within the site.

The public realm will contain appropriate landscaping and boundary treatments, public lighting and robust materials to deter anti-social behavior by avoiding the creation of blank facades, dark or secluded areas and enclosed public areas.

Section 16.4 of the City Development Plan requires:

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

The enclosed **Masterplan** and **Architects Design Statement** submitted under separate cover, provide a detailed outline of how redevelopment of the Bailey Gibson site will contribute to ‘place-making’ in this central urban location. In addition, a **Social Infrastructure Audit** is enclosed with this report, providing an overview of community facilities within the locality.

In brief, this SHD proposal has been carefully developed to embrace the established residential character of the South Circular Road through a scheme that is sympathetic in scale and design to its distinctive residential

character. At the same time, it seeks to respond to the site's urban context and the regeneration objectives of the City Development Plan for SDRA 12 by creating a sustainable, contemporary and vibrant new neighbourhood with an appropriate level of density for this highly accessible location near Dublin city centre.

The design approach has been to provide landmark buildings and create a modulated, dynamic skyline that is simultaneously sensitive to its surrounds and creates a sense of place. The proposed public realm and future integration with the wider Masterplan area through a network of new connections will promote social interaction and movement through high quality design and an appropriate mix of uses that promote activity.

Permeability is a fundamental theme and underpins the contribution of this site to place-making within the context of SDRA 12. The key pedestrian desire paths across the site have been identified and informed the design of the public realm and internal roads as shared spaces within this new quarter. Provision of three pedestrian access points, including one at the South Circular Road, one at Rehoboth Place and another from Rehoboth Avenue, will promote permeability and promote pedestrian activity through the site, enhancing connections with the surrounding lands.

The proposed development will lead to the creation of a vibrant, attractive and sustainable new community that will ultimately merge with future development in SDRA 12 in accordance with the approved Masterplan.

The provision of extensive resident amenities / services and open spaces will further enhance the liveability of this BTR scheme for future occupants. Further information regarding the full range of resident support services / facilities and communal amenities are provided in the accompanying **Architects Design Statement** and **Statement of Consistency with National, Regional and Section 28 Ministerial Guidelines**, submitted under separate cover. In sum, a total area of 3,430 sq.m has been provided for tenant services and amenities and communal open spaces, thoughtfully designed to create opportunities for social interaction and community integration.

7.5.3 Plot Ratio

The subject site is predominantly located on lands zoned Z4 – District Centres and Z14 – Strategic Development and Regeneration Area in the Dublin City Development Plan 2016 – 2022. The Z1 zoned land in the north-east comprises only a small portion of the site and will contain 4 no. townhouses. The indicative plot ratio for Z1 lands in the City Development Plan is 0.5 – 2.0. However, it is considered more appropriate to consider the plot ratio for the proposed development in the context of the standards for Z4 and Z14 zoned lands.

The indicative plot ratio for Z4 zoned lands is 2.0 and between 1.0 - 3.0 for Z14 zoned lands. The Development Plan further states that higher plot ratios may be permitted in certain circumstances such as:

- Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed; and
- To facilitate comprehensive redevelopment in areas in need of urban renewal.

The plot ratio for this SHD proposal based on a cumulative GFA of 37,768 sq.m for the development is 2.4 and accordingly, this plot ratio is aligned with the indicative standards of the Development Plan for both Z4 and Z14 zoned lands.

7.5.4 Site Coverage

As with plot ratio standards, the Development Plan allows for higher site coverage in certain circumstances such as:

- Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed; and
- To facilitate comprehensive redevelopment in areas in need of urban renewal.

For Z4 and Z14 zoned lands, the indicative site coverage is 80% and 50% respectively. In the case of Z1 lands the indicative site coverage is 45% - 60%. This is a residential led scheme which has been designed as part of the master-planning process for SDRA 12 and so it is considered appropriate to apply the lower value of 50% for Z14 sites.

In this instance, the proposed site coverage is 33% based on the ground floor GFA for each of the blocks as follows, BG1 (1,665 sq.m), BG2 (1,258 sq.m), BG3 (718 sq.m), BG4 (1,188 sq.m) and BG5 (234 sq.m) with a cumulative GFA of 5,063 sq.m. This site coverage protects against the adverse effects of over development and safeguards the amenities of existing adjoining and proposed development.

Whilst the site coverage for the proposed redevelopment falls below the City Development Plan indicative standard, it is considered that 50% coverage is not a target. The circumstances of this brownfield site are such that enhanced connections, permeability and public realm treatment are integral design components and mandate that the appropriate density targets for this site should be achieved by increased height, rather than relying on site coverage as a suitable measure. The importance of creating a high density residential scheme at the Bailey Gibson site to secure the regeneration objectives for SDRA 12 and integrate with future development of the Masterplan site, requires that an appropriate design response be embraced.

7.6 Car & Cycle Parking

The City Development Plan includes three zones (1, 2 and 3) for which to assess car parking standards. It provides for restricted car parking in Zones 1 and 2 having regard to the proximity of these locations to public transport. **Figure 11** is an extract from Map J (Strategic Transport and Parking Areas) of the Dublin City Development Plan 2016-2022, which shows that the site is within Zone 2.

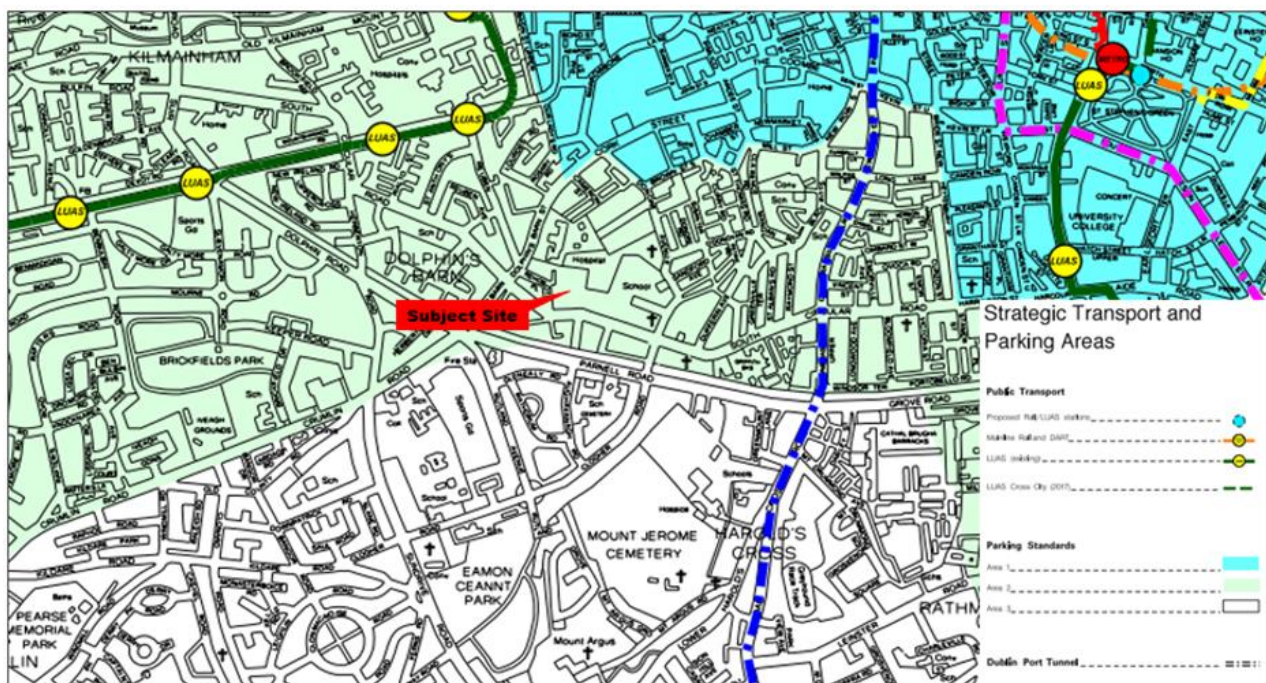


FIGURE 11 STRATEGIC TRANSPORT AND PARKING AREAS

Table 16.1 (Maximum Car Parking Standards for Various Land-Uses) of the City Development Plan states that the maximum car parking provision is 1 space per dwelling within Zone 2. Where a deviation from the maximum

standards is to be considered, the acceptability of proposals will be assessed against a range of criteria that have regard to the site's location and accessibility, impacts on the public realm and surrounding streetscape, maximising efficiencies in urban land use and promotion of a modal shift to safeguard investment in public transport.

Further, Section 16.38.9 of the Development Plan states:

“Car parking standards are maximum in nature and may be reduced in specific, mainly inner city locations where it is demonstrated that other modes of transport are sufficient for the needs of residents.”

The proposed level of car parking provision is at a rate of 0.3 spaces per unit, commensurate with the site's proximity to Dublin City and accessibility to high capacity and high frequency public transport services.

Table 11 below compares the proposed long stay car parking against the maximum standards of the Development Plan. It is notable that the City Development Plan does not stipulate a requirement for short stay car parking, rather it advocates assessment on a case-by case basis. Requirements in relation to both long and short stay cycle parking are also presented.

Type	DCC Standards	Proposed
Car Parking	416 (Max)	122
Motorcycle	16 (Max)	12
Cycle Parking (Long Stay)	416	543
Cycle Parking (Short Stay)	203	84

TABLE 11 CAR PARKING MAXIMUM STANDARDS & PROVISION

The proposed development includes a total of 122 no. long stay car parking spaces comprising 106 no. at basement level (including 10 no. disabled spaces), 12 no. podium level car spaces (including 1 no. disabled space) and 4 no. resident spaces for the townhouses in Block BG5. 12 no. motorcycle spaces for residents and visitors are also included at basement level and charging points for electric vehicles for 10% of the spaces initially, with 100% capability. An additional 15 no. short stay spaces are provided at street level, together with 3 no. set down spaces to facilitate crèche and taxi pick-ups and drop offs.

The car parking strategy is complemented by a sustainable travel plan (see accompanying **Mobility Management Plan**) which underpins the scheme and will promote active modes of travel. In line with this approach, a significant quantum of bicycle parking spaces is proposed within the development. In total, 627 no. bicycle spaces shall be provided, including 543 no. in secure covered storage areas for residents and the remainder as on-street visitor spaces.

The Development Plan objective to reduce car parking provision in appropriate locations and promote more sustainable modes of travel aligns with recent national policy guidance, specifically SPPR 8 of the *Design Standards for New Apartments Guidelines* (2018). SPPR 8 provides for substantially reduced car parking provision in central and/or accessible locations that are well served by public transport.

The current proposal has been informed by a **Traffic and Transport Assessment**, which accompanies this application and provides a detailed analysis of the proposed car parking strategy having regard for the proposed development and locational context.

7.7 Visual Impact

The accompanying **Architects Design Statement** submitted under separate cover, provides a detailed description of the architectural design approach which has underpinned the proposed development.

A brief synopsis of the architectural approach, having regard for the visual impact of the development, is as follows:

- The proposed residential led development at this site is consistent with the location of higher density, taller buildings in central urban locations.
- The height rationale and density of development is appropriate for the Z4 District Centre and Z14 Strategic Development and Regeneration Area zoning objectives. The proposed height and density of development is also consistent with the regeneration objectives for the wider Masterplan lands and has evolved in response to an extensive consultation process with Dublin City Council.
- The site benefits from high levels of accessibility to public transport and therefore meets the national and local planning objectives of consolidation and compact growth.
- The prominent location of this urban site necessitates an architectural response that enhances the Dublin skyline, whilst being sensitive to its residential setting, ensuring the scheme has the capacity to become a distinct place within the city.
- The height of the proposed scheme presents an opportunity for enhanced visual amenity at a site that is under-utilised and includes the prospect of *views out* of the scheme by residents / workers, as well as *views of* the development from the surrounding streetscape and further afield.
- The scale of the development has been carefully considered, with a focus on the central taller building elements which will create visual 'landmarks' or 'urban markers' of the scheme.
- The height of residential blocks is stepped down towards the western and southern site boundaries and does not exceed five stories where the block adjoins existing low-rise housing, in order to avoid an overbearing presence onto neighbouring properties and streets.
- Building façades which face directly towards the surrounding streetscape and proposed public realm are formed from a textured brick finish to integrate with the distinctive character of the established residential area, provide articulation and create a sense of domestic proportions.

A **Landscape and Visual Impact Assessment** accompanies this proposal together with a comprehensive set of **Photomontages** that illustrate for each of the 25 no. viewpoints; the 'baseline', 'proposed Bailey Gibson' and 'proposed Bailey Gibson + masterplan'. The LVIA concludes that the effects of the proposed development on landscape and visual amenity will range from neutral to positive.

The scale of the Masterplan area necessitates the creation of a new urban neighbourhood with its own distinctive character. The proposed development of the Bailey Gibson site successfully delivers the first part of this vision, with its layout and design fully integrating with an emerging pattern of development in the wider area.

Regarding views from the main routes surrounding the Bailey Gibson site, the impact is assessed as follows;

- Donore Avenue - views of the proposed Bailey Gibson development from Donore Avenue will have a moderately positive visual impact in the context of the proposed public open space delivered as part

of the wider Masterplan Area. From nearby residential streets that are orientated towards the site, the proposed development will have slight visual impacts that are neutral or positive.

- South Circular Road – views from SCR encompass glimpses of the proposed development behind intervening houses, with a slight and neutral visual impact. In close proximity to the site where new houses are seen to extend to South Circular Road, visual impacts are generally slight and positive.
- Cork Street – from Cork Street and the northern residential environs, the Bailey Gibson development makes a minor and sometimes short-term contribution to views, where visual impacts are slight and neutral.
- Grand Canal - from the Grand Canal and southern residential environs, the Bailey Gibson development gives rise to slight to moderate effects on the views, resulting in slight visual impacts that are neutral or positive.

7.8 Daylight and Sunlight Analysis

Please refer to the **Daylight, Sunlight and Overshadowing Study** prepared by IES and submitted under separate cover for further details regarding this matter. Key conclusions from the report are;

- Overshadowing - overall, there is minimal overshadowing from the proposed Bailey Gibson development due to the considered architecture along the west side (along Rehoboth Place/Avenue) where the potential for overshadowing to existing buildings is greatest. This would be categorised as a minor adverse impact under the BRE recommendations.
- Sunlight to Proposed Amenity Spaces - for a space to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on the 21st of March. The analysis demonstrates that all of the amenity spaces receive 2 hours of sunlight on the reference date and therefore the scheme exceeds the BRE recommendations.
- Average Daylight Factors (ADF) – for this application, 101 no. 'worst-case' rooms were selected for analysis on the second, third and fourth floors across the proposed blocks. 96% of the spaces tested have an ADF above the recommended values in line with the BRE guidelines. This number across the scheme would be expected to increase further if all of the upper rooms were included in the results.

7.9 Part V Social Housing

Part V requirements under the Planning and Development Act 2000, as amended, apply to Build to Rent developments.

The DHPCLG Housing Circular 36 2015, Section 96 (3) sets out six types of Part V agreement that may be made, including:

- i. Transfer of lands (Section 96(3), paragraph (a));
- ii. Build and transfer of up to 10% of the proposed housing units (Section 96(3), paragraph (b)(i));
- iii. Transfer of housing units on any other land in the functional area of the planning authority (Section 96(3), paragraph (b)(iv));
- iv. Lease of housing units either on the subject site of the application or in any other location within the functional area of the planning authority (Section 96(3), paragraph (b)(iva));

- v. Combination of a transfer of land and one or more of the other options; and
- vi. Combination of options not involving a transfer of the ownership of land (Section 96(3), paragraph (b)(viii)).

The Applicant has engaged with Dublin City Council regarding their Part V obligations and this application is accompanied by a Part V Submission that includes a letter of validation from Dublin City Council's Housing Department.

It should be noted that the Applicant reserve their right to avail of any of the six types of Part V agreements as set out in the DHPCLG Housing Circular 36 2015, Section 96 (3).

8. Unit Mix Justification

8.1 Introduction

Build to Rent (BTR) accommodation is a new sector within the private rental market, both in the Irish context and abroad. New guidance on BTR development was introduced in the *Design Standards for New Apartments Guidelines* (2018), following publication of Rebuilding Ireland – Action Plan for Housing and Homelessness (2016).

Under Pillar 4 of the Action Plan ‘Improve the Rental Sector’, the Government of Ireland identified the following key objective:

“Addressing the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.”

To realise this objective, Rebuilding Ireland contains a series of key actions aimed at providing greater certainty for landlords, increasing supply and investment in the market, improving standards of rental accommodation and management, and strengthening services to empower tenants and landlords. One of the key actions is to “encourage build to rent” and the plan seeks to actively expand the BTR sector.

Thus, the proposed development has arisen following Government initiatives to provide for large scale, high quality rental accommodation that is owned and operated by institutional entities and so meet the needs of the growing rental market. Inclusion of new policies in the 2018 Guidelines aimed specifically at BTR accommodation are intended to provide a new way of meeting the housing needs of key societal sectors such as the young and increasingly internationally mobile workforce and older persons who want to live independently.

The research undertaken to inform this report aligns with the recent Guidelines revealing that accommodation for smaller households comprising 1-2 persons is increasingly in demand. The total number and mix of apartments within the Bailey Gibson development is as follows;

- 19 no. studio apartments (5%)
- 251 no. 1 bedroom apartments (60%)
- 136 no. 2 bedroom units including 134 no. apartments and 2 no. duplex apartments (33%)
- 6 no. 3 bedroom triplex apartments (1%)
- 4 no. 4 bedroom townhouses (1%)

Having regard to the prevailing housing stock in the locality, greater provision of apartments with 1 or 2 bedrooms is required to facilitate changing household trends; to accommodate new household formation; and house those moving to Dublin for employment purposes, whether from other parts of Ireland, or further afield.

8.2 Methodology

The Bailey Gibson site is located within the Merchants Quay F Electoral Division (ED) and data for this ED is reviewed to provide a profile of the area (identified as the ‘application area’) immediately surrounding the subject site.

Given the urban location of the subject site and its accessibility to public transport, a 1km radius (approximately 15-minute or less walk) was considered appropriate to define the wider ‘study area’ and so the available data for this area was also examined.

Within the 1km study area, 21 no. Electoral Divisions (EDs) were identified; Merchants Quay B, Merchants Quay C, Merchants Quay D, Merchants Quay E, Merchants Quay F, Ushers A, Ushers C, Ushers D, Ushers

E, Ushers F, Crumlin C, Crumlin B, Crumlin D, Kimmage C, Kimmage B, Rathmines West A, Rathmines West F, Wood Quay B, Wood Quay A, Terenure A and St. Kevins, illustrated in **Figure 12**.

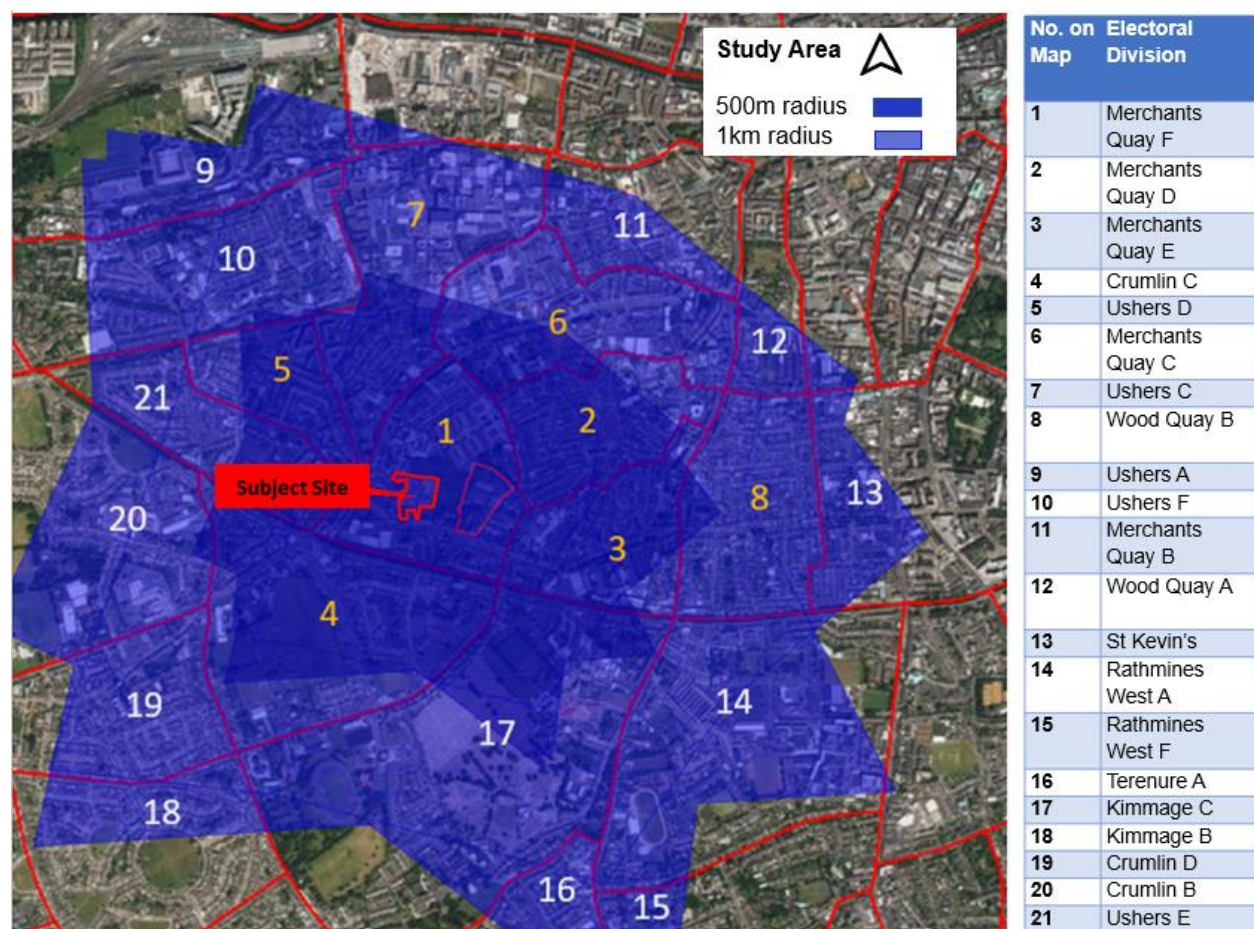


FIGURE 12 BAILEY GIBSON STUDY AREA (ED'S WITHIN 1KM)

Census data for each of these EDs was reviewed to inform this assessment and is compared with National and County (Dublin City) averages across a number of data sets.

This unit mix rationale primarily relies upon a review of data on:

- Population trends
- Population by age cohort
- Households and families
- Existing housing stock
- Existing worker population and commuter flows

The profile of the study area has also been considered in the context of existing and proposed public transport within the vicinity of the subject site and accessibility to local employment centres.

8.3 Demographic Profile

The subject site is located within the 'Merchants Quay F' Electoral Division (ED) which had a population of 2,158 during the last census (2016). This area has been decreasing in population size (by -13.9% in the last 10 years), which may be due to a number of factors such as unsuitability of existing housing stock, lack of affordability and insufficient availability of rental accommodation in the immediate area.

Table 12 below shows the population figures for the Merchants Quay F ED, when compared to the wider study area, the Dublin City administrative area and Ireland overall. In total, there were 68,945 people living within the ED's in a 1km radius of the application site in 2016 which represents a 4.47% increase since 2011 and an 8.82% increase since the 2006 census, showing that the study area is experiencing continued strong population growth.

Location	2006	2011	2016	5-year	10-year
Merchants Quay F	2,459	2,405	2,158	-10.3%	-12.2%
Study Area	62,585	65,573	68,945	+5.14%	+10.16%
Dublin City	506,211	527,612	554,544	+5%	+9.5%
Ireland	4,239,848	4,588,252	4,761,865	+3.8%	+12.3%

TABLE 12 POPULATION TRENDS – LOCAL, COUNTY & NATIONAL

The sustained population growth in the study area since 2006, is in contrast to the population decline experienced within the Merchants Quay F ED in the same period, alluding to a deficiency in the availability of suitable accommodation to meet the housing needs of the population in the immediate area.

8.4 Age Profile

The majority of the population within the Merchants Quay F ED (application area) is in the Adult (25-64 years) age cohort which makes up 64.5% of the overall population in the area, being 11.5% above the national figure. It is noted that the proportion of the population in the Pre-school (0-4 years) cohort is higher than the national average, while Older Adults (65+ years) account for substantially less than the national average. In addition, the Young Adult (19-24) cohort is also greater than the national average. These differences highlight that the population in the application area comprising Merchants Quay F ED are home to a younger demographic with a large proportion of working age, see **Table 13**.

Age Cohort	Merchants Quay F ED	% Total	Ireland	% Total
Pre-school (0-4 years)	208	9.6%	331,516	7%
School Age (5-18 years)	203	9.4%	920,281	19%
Young Adults (19-24 years)	227	10.5%	331,208	8%
Adults (25-64 years)	1,391	64.5%	2,541,294	53%
Older Adults (65+ years)	129	6%	637,567	13%
Total	2,158	100%	4,761,865	100%

TABLE 13 POPULATION BY AGE COHORT

8.5 Households and Families

Table 14 shows 1-2 person households made up a substantial number of households in the Merchants Quay F ED (69%), even higher than the proportion for Dublin City (52%), highlighting the need for suitable accommodation to cater to smaller households in this location. This is consistent with demographic trends which indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons. However, despite the substantial rise in 1-2 person households, only 21% of new dwellings completed since that time contain apartments.

Location	1-2 Person Households	Total Households	% 1-2 Person Household
Merchants Quay F	605	871	69%
Study Area	19,141	28,804	66%
Dublin City	127,639	211,747	60%
Ireland	886,351	1,702,289	52%

TABLE 14 CENSUS 2016, 1-2 PERSON HOUSEHOLDS

Following in **Figure 13** is a map showing the percentage change in average household size by ED, for both the application area located in Merchants Quay F ED and the study area between 2011 and 2016. Interestingly, the Merchants Quay F ED experienced a reduction in average household size, in contrast to the majority of the study area where household sizes increased in the period. However, having regard to the very high proportion of 1-2 person households within the Merchants Quay F ED, and the overall decline in the population between 2006 and 2016, it would be reasonable to conclude that as people have moved away from the family home, they have re-located to other areas outside this Electoral Division.

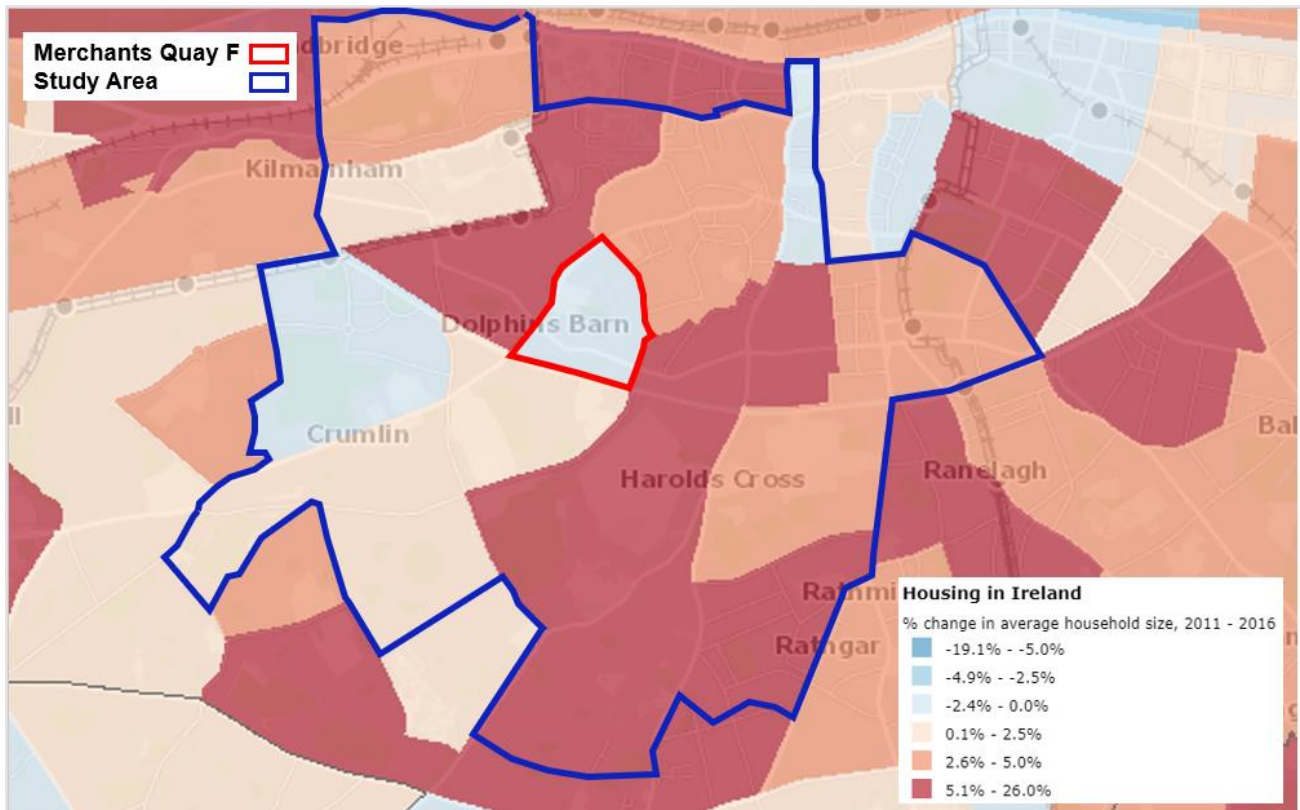


FIGURE 13 PERCENTAGE CHANGE IN HOUSEHOLD SIZE BY ED 2011-2016, SOURCE: CSO MAP 2.1

The 2016 census results also provide data on the number of families where the youngest child is 20 years or more. Following in **Table 15** is the proportion of families in both the Merchants Quay F ED and the 1km study area, where the youngest child in the family is at least 20 years of age.

Location	% Families where youngest child is 20yrs+
Merchants Quay F ED	17%
Study Area	26%

TABLE 15 FAMILIES WHERE YOUNGEST CHILD IS AGE 20 YEARS OR MORE, CSO 2016

In addition, following is a breakdown of families by family cycle, based on Census 2016. It classifies family units on the basis that the family nucleus has no children, i.e., pre-family, empty nest and retired or where they have children, that the oldest child is in the age category identified.

Table 15 includes data for the Merchants Quay F ED which contains the subject site, as well as the Dublin South Central constituency comprising 43 ED's in Ballyfermot, Bluebell, Chapelizod, Crumlin, Drimnagh, Dolphin's Barn, Inchicore, Kimmage (parts) and Walkinstown.

As can be seen in **Table 16**, 11.8% of families in the Merchants Quay F ED are made up of families where the oldest child is an adult (20 years or over) and this figure is even greater in the wider area comprising Dublin South Central, being 28%.

Family Cycle		Merchants Quay F ED		Dublin South Central	
		No. Families	% Total	No. Families	% Total
No Children	Pre-Family	142	35.7%	4,874	17.4%
	Empty Nest	31	7.8%	2,303	8.2%
	Retired	18	4.5%	2,156	7.7%
With Children	Pre-School	55	13.8%	3,108	11%
	Early School	42	10.6%	2,867	10.2%
	Pre-Adolescent	35	8.8%	2,419	8.6%
	Adolescent	28	7%	2,780	9.8%
	Adult	47	11.8%	7,848	28%
Total		398	100%	27,985	100%

TABLE 16 FAMILIES BY FAMILY CYCLE FOR MERCHANTS QUAY F ED & DUBLIN SOUTH CENTRAL, CSO 2016

Additionally, 48% of families in the Merchants Quay F ED have no children, significantly higher than the surrounding region of Dublin South Central for which the proportion is 33.3%.

The information provided in **Tables 15** and **16** highlights that young adults are living at home for longer, unable to secure appropriate housing due to lack of supply and particularly constrained by the resultant lack of affordability. This corresponds with national data that shows a trend towards more working adults continuing to live in the family home, as follows:

“The number of adults, aged 18 years and over, who were working and still living at home increased by 19 per cent between 2011 and 2016, increasing from 180,703 to 215,088... Those aged 30 to 34 saw a 26 per cent increase rising from 23,835 to 30,137 over the five years.”¹

Chronic undersupply of housing and lack of affordable rental accommodation is having a marked impact on the capacity of young people, including working adults to move outside the family home. This trend, which has persisted since the economic downturn is unlikely to be reversed unless a significant increase in housing output is achieved.

8.6 Existing Housing Stock

The total housing stock in the study area in 2016 was 33,423 dwellings, 1,077 of which are in the Merchants Quay F Electoral Division. Within the Merchants Quay F ED, 174 units were recorded as vacant at the time of the census, possibly due to the age of housing in this area and the need for many homes to be renovated or upgraded so that they are fit for purpose, see **Table 17**.

¹ Source: <https://www.cso.ie/en/releasesandpublications/ep/p-cp4hf/cp4hf/fmls/>

However, it is noted that the vacancy rate dropped during the intercensal period. The high demand for housing in accessible urban locations and restrictive mortgage lending practices, combined with chronic undersupply of housing generally, has led to substantial inflation in the rental market and likely explains the decreasing vacancy rates across the City, again indicative of the need for new housing stock.

Location	2011			2016		
	Total Stock	Vacant Stock	Vacancy Rate	Total Stock	Vacant Stock	Vacancy Rate
Merchants Quay F	994	213	21.4%	1,077	174	16.2%
Dublin City	241,678	24,638	10.2%	240,063	18,424	7.7%
Ireland	1,994,845	289,451	14.5%	2,003,645	245,460	12.3%

TABLE 17 HOUSING STOCK AND VACANCY RATES 2011-2016

New dwelling completions within the Dublin 8 area increased substantially when compared to other locations nearby in South Dublin, with the highest overall numbers in the period shown due to significant increases since 2016, see **Table 18**. It is considered that these new dwelling completions reflect recent higher demand for housing in this location.

Location	2014	2015	2016	2017	2018	2019	Total
Dublin 6	51	73	51	134	172	64	545
Dublin 6W	14	35	58	50	80	219	456
Dublin 8	30	34	84	114	178	259	699
Dublin 10	2	1	3	24	122	19	171
Dublin 12	39	8	44	116	96	175	478

TABLE 18 NEW DWELLING COMPLETIONS BY EIRCODE AND YEAR

Table 19 identifies permanent housing located within the Merchants Quay F ED and wider study area by year built. It shows that the greatest proportion of housing stock (36.5%) within the application area was constructed prior to 1919, compared with 21.5% in the study area. It is noted that much of this older housing stock was built by the Council up to the mid 1900's in response to the severe overcrowding and sub-standard conditions which were associated with older tenement buildings in Dublin city centre.

Housing Stock	Merchants Quay F ED	Study Area
Pre 1919	36.5%	21.5%
1919-1960	16%	31%
1961-1980	5.3%	6.4%
1981-2000	6%	14.2%
Post 2000	22%	12.6%

TABLE 19 PERMANENT PRIVATE HOUSEHOLDS BY YEAR BUILT (2016)

Following in **Table 20** is a breakdown by type of accommodation available in the application area of Merchants Quay F ED. The House / Bungalow typology make up more than half of the total housing stock (53%), followed by Flats / Apartments (40%). Within the study area, the figures are similar being 54% and 43% respectively.

Accommodation Type	Merchants Quay F ED	Study Area
	% Total	% Total
House / Bungalow	53%	54%
Flat / Apartment	40%	43%
Other / Not Stated	7%	3%

TABLE 20 PRIVATE HOUSEHOLDS BY TYPE OF ACCOMMODATION, MERCHANTS QUAY F ED (2016)

8.7 Employment Opportunities and Transport

The 2016 CSO boundary set 'Workplace Zones' (WPZ's) identifies the percentage of persons at work over the daytime population. **Figure 14** shows WPZ's mapped in the vicinity of the subject site.

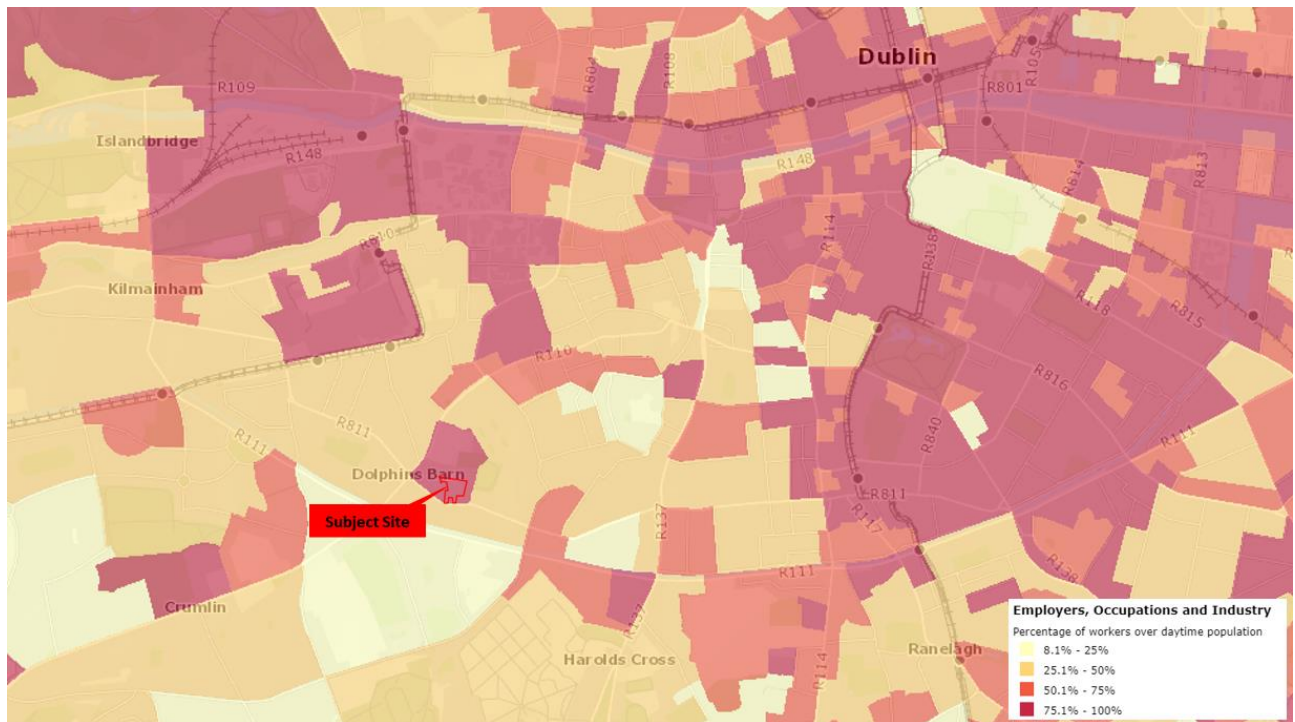


FIGURE 14 PERCENTAGE OF WORKERS OVER DAYTIME POPULATION, CSO 2016

It is evident from **Figure 14** that the area immediately surrounding the subject site attracts a significant number of workers reflecting the close proximity of employment opportunities. The data shows that in 2016 there was an estimated daytime population of 1,041 persons in this workplace zone and 924 persons at work. The Coombe Women's Hospital is likely to account for a significant proportion of the workers in this location.

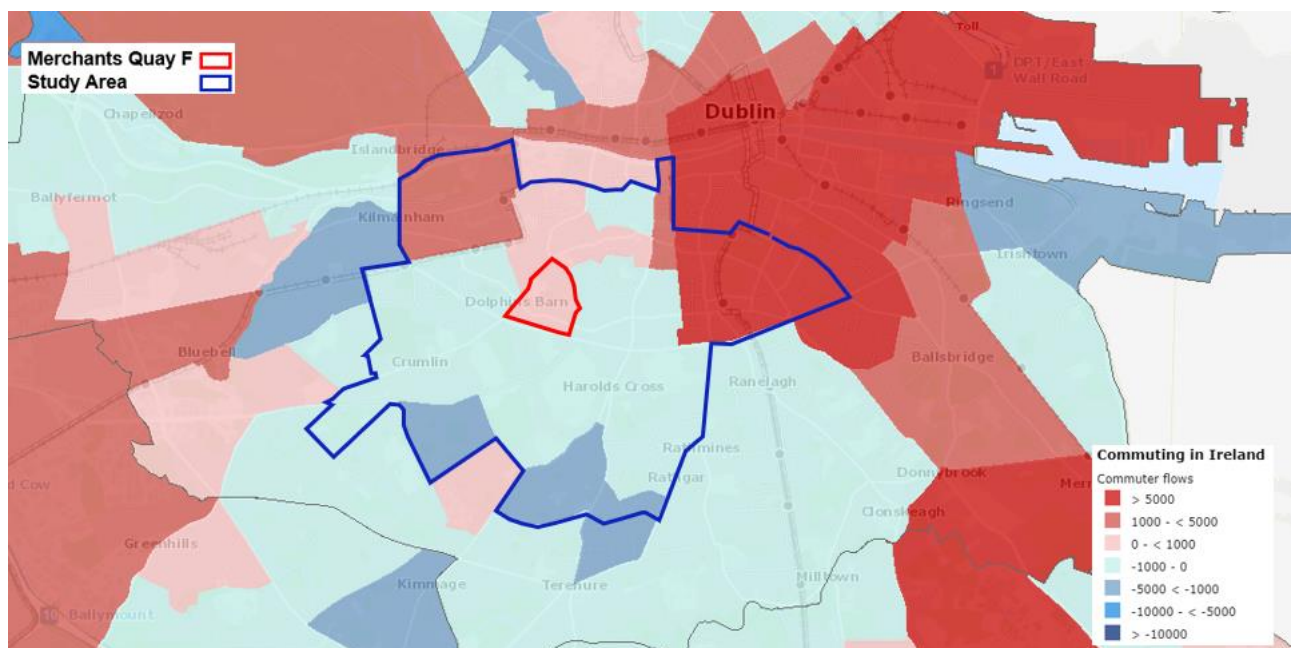


FIGURE 15 COMMUTER FLOWS (INWARD COMMUTERS LESS OUTWARD) BY ED, CSO 2016

Figure 15 maps commuter flows (inward commuters less outward) by Electoral Division based on Census 2016 data. It indicates that the application area of Merchants Quay F ED is attracting more persons than are travelling outside the area for the purposes of employment and education. The boundary of the study area is also shown in **Figure 15**, highlighting that there are a large number of persons travelling to areas in the north and east for the purposes of work and education.

The number of persons at work shown in **Figure 14**, coupled with the mapping of commuter flows in **Figure 15** corresponds with the concentration of jobs in nearby employment centres. The Coombe Hospital, St James's Hospital and the Royal Victoria Eye and Ear Hospital are all located within ED's in the study area. To the north-east of the study area, the substantial employment generated in Dublin city centre and Dublin Docklands is reflected by commuter flows to these locations.

Section 3.3 of the **Traffic and Transport Assessment** prepared by SYSTRA and submitted under separate cover, further highlights the scale of employment opportunities in the vicinity of the Bailey Gibson site. It indicates that there are over 72,000 jobs within a 30 minute walk.

In addition, Section 3.4 of the TTA highlights the number of jobs within a 30 minute cycle of the subject site;

"The city centre, TUD Grangegorman, Coombe and St James's Hospitals and Heuston Station are all within a 15-minute cycle of the site. There are an estimated 148,050 jobs within a 15-minute cycle of the site and over 340,000 within a 30-minute cycle."

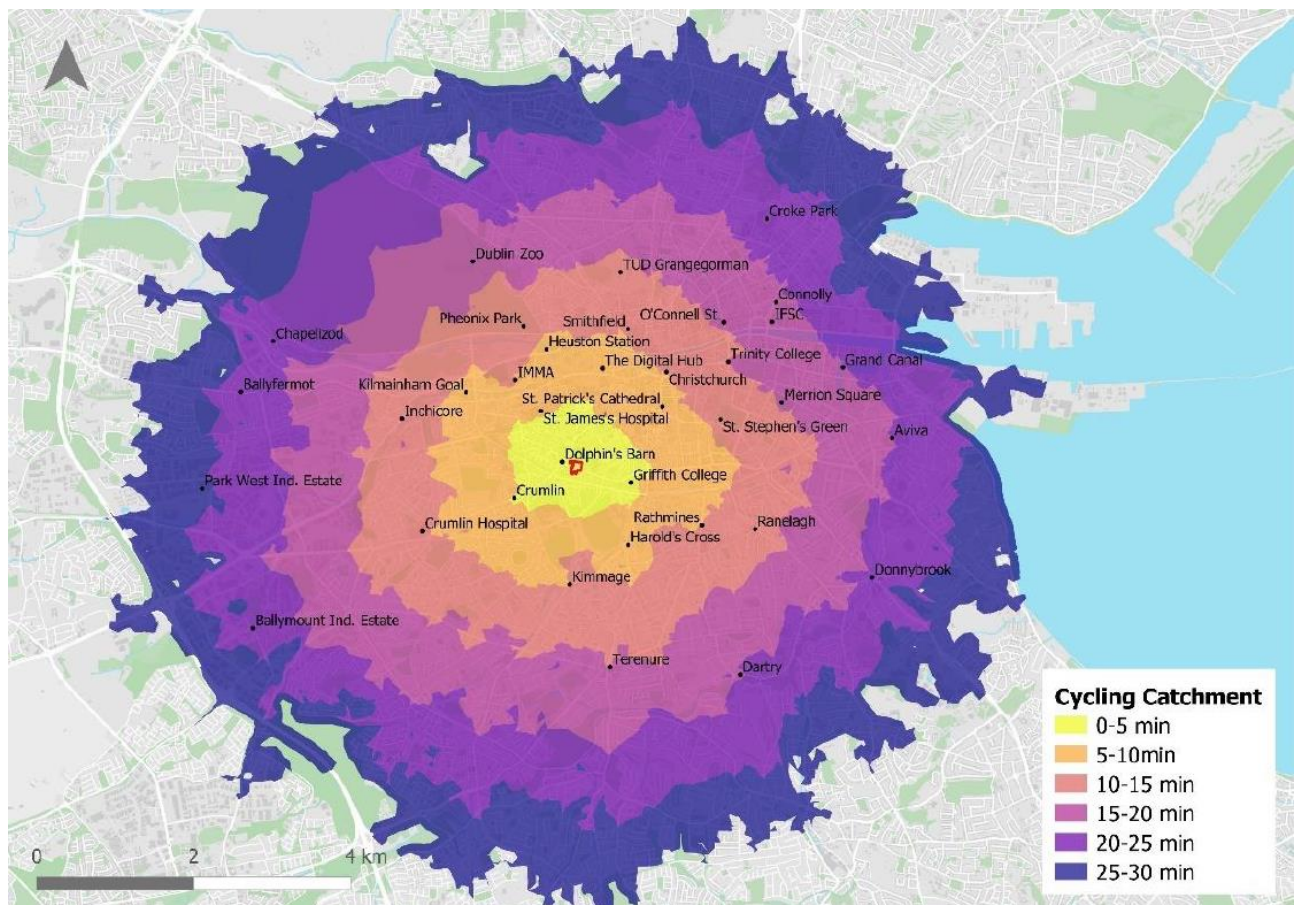


FIGURE 16 CYCLING CATCHMENT FOR BAILEY GIBSON SITE (SOURCE: SYSTRA TTA)

Figure 16 above maps the cycling catchment (up to 30 minutes) for the subject site, noting key employment destinations.

8.8 Existing and Proposed Public Transport

The subject site is well connected in terms of road and public transport links, see **Figure 17**. Fatima LUAS stop is c.800m north-west of the site (walk time less than 10 minutes), while South Clondalkin QBC connecting the site with the city centre and south-western suburbs of Dublin extends along Cork Street and Dolphin's Barn Street and is situated c.200m to the west (2-4 minute walk).

The locality is well served by Dublin Bus, with the nearest bus stops being c.45m from the site on the northern side of South Circular Road and c.64m away on the southern side of South Circular Road. These bus stops provide the subject site with connections to the city centre, Ashington in north Dublin, Drimnagh to the south-west and Greenogue Business Park to the west.

Additional high frequency bus services are also available along the nearby QBC at Dolphin's Barn Street / Cork Street, where the nearest bus stops are located c.385m and c.435m away on the eastern and western sides of the QBC respectively. These bus stops are served by routes 17 and 17D (Rialto to Blackrock station), 27 (Jobstown to Clare Hall), 56A (Tallaght to Ringsend Road), 77A and 77X (Citywest to Ringsend Road) and 151 (Foxborough to Docklands), connecting the subject site with Dublin city centre and the greater Dublin metropolitan area. In addition, the site is a 44-minute walk and 16-minute cycle to Dublin city centre, therefore suiting the needs of all commuters.

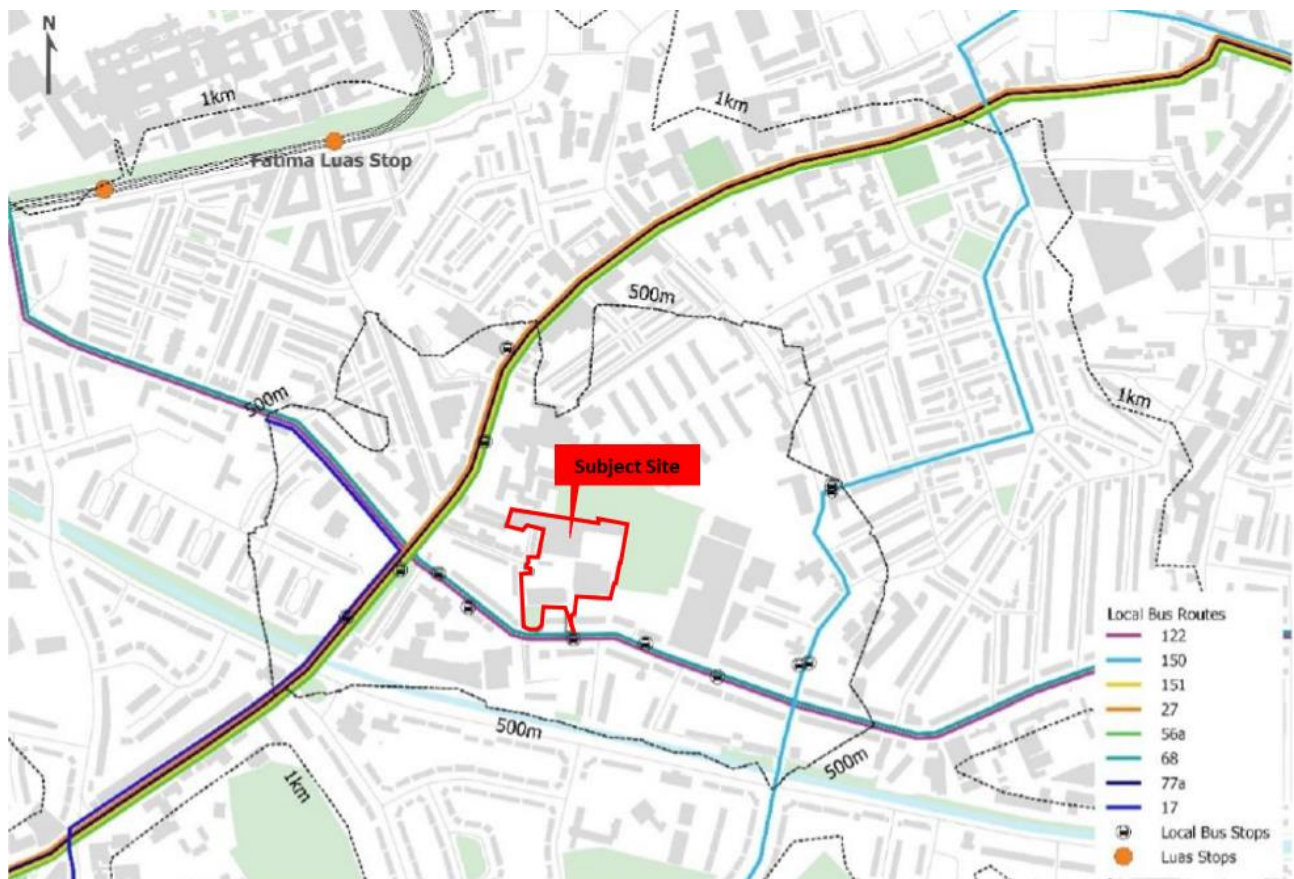


FIGURE 17 EXISTING PUBLIC TRANSPORT SERVICES

In addition to the high level of connectivity provided by existing high capacity and high frequency public transport services, future infrastructural improvements are planned under the BusConnects programme. There are a total of 16 core bus corridors which are proposed to be developed over 3 phases. Greenhills-City Centre Corridor which runs along Dolphin's Barn Street is planned to be developed in phase 2 of the project. The preliminary design for these corridors is currently being progressed by National Transport Authority.

The Greenhills-City Centre Corridor is classified as a very high frequency spine with frequencies of 2.7 to 3.7 minutes proposed along Dolphin's Barn Street / Cork Street. In addition, a new orbital route is planned along the South Circular Road which will pass directly in front of the proposed development and this route will operate at a frequency of 5-10 minutes.

8.9 Conclusion

The review of available data undertaken for the purposes of this report, provides a profile of the application area and surrounding lands with respect to:

- Population trends
- Population by age cohort
- Households and families
- Existing housing stock
- Existing worker population and commuter flows

The census data shows that contrary to prevailing trends in the study area, Dublin City and nationally, the Merchants Quay F ED has actually experienced population decline, likely attributable to deficiencies in the availability of suitable housing stock to meet demand.

A substantial proportion (64.5%) of the population are within the adult age cohort (25-64 years), significantly more than the national figure which is 53%. Thus, a substantial proportion of the local population are of working age and likely wish to live close to where they work.

Consistent with increasing trends toward smaller household sizes generally, 69% of households within the Merchants Quay F ED are comprised of 1-2 person households, even greater than the surrounding study area (66%), Dublin City (60%) and Ireland (52%).

The available data regarding families with adult children showed that both within the application area (situated within the Merchants Quay F ED) and the wider region, there is a prevalence of adult children residing in the family home, consistent with national trends. This is borne out in the breakdown of families where the youngest child is 20 years of age or more, being 14% in the application area and 26% in the 1km study area. The statistics regarding families by 'family cycle' also show the extent to which this has become a phenomenon with 11.8% of families in the Merchants Quay F ED made up of families where the oldest child is an adult (20 years or over) and this figure is even greater in the wider area comprising Dublin South Central, being 28%.

Decreases in vacancy rates within the application area of Merchants Quay F ED, the 1km study area and Dublin City were identified, reflecting the increased demand for available accommodation to meet housing need. This increase in housing demand is further reflected in the new dwelling completion numbers which shows that more dwellings were constructed in the Dublin 8 area compared with the surrounding Eircode districts since 2016, resulting in the highest number overall between 2014 and 2019 (699 no. units).

Despite the increased take up of vacant housing stock, the data shows that the largest proportion of housing stock in the Merchants Quay F ED (application area) was built prior to 1919 (36.5%), compared with 21.5% in the study area. Of the existing housing stock in the application area, 53% were identified as houses / bungalows, on par with the study area (54%), despite the significant proportion of households comprising 1-2 persons, 69% and 66% respectively.

CSO mapping of 'Workplace Zones' and commuter flows indicates that there is a significant concentration of jobs in the immediate locality, with more people travelling into the area for work and study purposes than travel out.

This demographic profile highlights the importance of providing additional units within this location to counter the persistent decrease in population since 2006, cater to the significant number of 1-2 person households and the local working population. The delivery of suitable rental accommodation that caters to smaller households will also provide additional options for young working adults who are increasingly continuing to reside in the family home.

This rationale also set out in detail, the highly accessible location of the Bailey Gibson site. It is located close to the city centre and benefits from its proximity to high capacity LUAS services and high frequency urban bus services. Planned infrastructural improvements under the BusConnects programme will further enhance the site's connectivity.

At this strategically located brownfield site, the Bailey Gibson redevelopment presents an opportunity to respond to the needs of the local population and workforce, by providing an appropriate mix of units that is aligned with housing need and market demand.

The Build to Rent model has been promoted through various Government initiatives, including introduction of special provisions in the Design Standards for New Apartment Guidelines (2018) that identify the need for a more responsive, flexible approach to the supply of housing, to provide for large scale, high quality rental accommodation. The subject site satisfies the relevant locational criteria for such schemes, being a highly central and accessible urban location.

Further, the proposed mix of units, predominantly 1 and 2 bedroom apartments is deemed appropriate for the subject site, having regard to the prevailing demographic trends and significant employment opportunities in close proximity to this site.

9. Conclusion

The design of the proposed development has been informed by an understanding of the site context and the requirement to comply with planning and environmental legislation and policy.

Given the highly central and accessible nature of the site location, the most sustainable strategy for its redevelopment is to maximise density, minimise car parking and ensure ease of movement for pedestrians and cyclists, thereby promoting active modes of travel. The proposed redevelopment of the Bailey Gibson site is thus a high-density residential led development that will add vitality to the local area and provide substantial improvements to the site's permeability and create an attractive public realm.

The overarching objective is to create a new and sustainable urban neighbourhood that can aid in securing the regeneration objectives for this site and the wider SDRA 12 lands. The current proposal achieves this by providing opportunities to enhance permeability and connectivity and through a mix of residential and supporting commercial and community uses that will bring life to the site and surrounding street network. As the balance of lands within SDRA 12 are brought forward for development, this scheme will be fully integrated with the adjoining sites in accordance with the approved Masterplan, benefitting surrounding residents and future occupants.

The proposed Bailey Gibson redevelopment responds to the housing demands of the local community and workforce by incorporating a mix of unit sizes that will address the shortfall in housing supply and meet the identified needs of Dublin City. This residential led development has been designed to meet and where possible exceed the requirements of the *Design Standards for New Apartments Guidelines* (2018).

The architectural drawings, considered in conjunction with the **Architects Design Statement, Masterplan and Housing Quality Assessment** demonstrate the Applicant's commitment to delivering a well-designed scheme that will create a vibrant and attractive urban neighbourhood for people to live, work and socialise.

The design approach achieves optimum use of a site which will contribute to the creation of a dynamic, high-density development in this strategic urban regeneration site.

The design and layout of the proposed development will ensure the highest standards of urban design and sustainability are achieved, in a manner that responds to the established residential setting. The proposed redevelopment of the Bailey Gibson site therefore achieves the principles of proper planning and sustainable development.

Appendix 1

CBRE Report

Strictly Private & Confidential

CWTC Multi Family ICAV acting on behalf of its sub fund
DBTR SCR Sub 1 Fund
c/o Hines Real Estate Ireland Limited
Clanwilliam Court
1st Floor, Block 2, Clanwilliam House
Clanwilliam Place
Dublin 2, D02KR90

13 April 2020

RE: RETAIL VIABILITY AT BAILEY GIBSON SITE, PLAYERS SQUARE, DUBLIN 8

Please be advised that as requested, I have had regard to application drawings prepared by Henry J Lyons Architects for the aforementioned site and in particular considered the viability of potential retail provision within the proposed scheme. I note that there is a unit of 241 metres located in proposed block BG1, which has the potential to be a retail unit.

In my professional opinion, the volume of retail provision within the proposed scheme is appropriate for a residential development of the scale proposed. Considering existing retail provision in the general vicinity of the subject site in Dublin 8, it is wholly appropriate that the retail element of the proposed scheme be focussed primarily on complementing the residential offer, providing services and amenities for new residents that are otherwise not available in close proximity. Considering the number of residents that will be accommodated in the subject development on completion, I do not believe that the retail provision in the proposed scheme will impact negatively on existing retailers in the general vicinity.

While structural changes such as the move towards online retailing are impacting on some sectors of the Irish retail market at present, other sectors continue to perform well with particularly strong demand for new stores from convenience retailers, food and beverage occupiers as well as the health & beauty sectors. Retailers in these sectors continue to look for new stores and there is particularly strong demand from occupiers in these sectors to occupy units in mixed-use buildings, especially those containing a large volume of residential provision.

I understand that the Applicant contacted retail agents for professional advice on the layout, configuration and size of retail provision within this scheme during the design process to ensure that retail units would be compatible with current end user requirements. On this basis, I am confident that there will be strong demand from a range of different retailers for stores within the proposed development on completion.

I trust this is in order. If you have any queries, please do not hesitate to contact me.

Kind regards,



Marie Hunt
Executive Director, Head of Research

DRAFT