

APPENDIX (A)

Chief Executive and Departmental Reports

SHD0024/19

ABP – 305676 – 19

**Lands to the Rear of Connolly Station,
Connolly Station car park,
Sheriff Street Lower,
Dublin 1.**

Report on Planning Application

Plan No:	SHD0024/19
Location:	Lands to the rear of Connolly Station, Sheriff Street Lower, Oriel Street and Seville Place, Dublin 1
Applicant:	Oxley Holdings Limited.
Proposal:	Demolition of 4 no. existing structures on site and provision of 741 no. Build to Rent Apartments with 1444sq.m. of residential amenities and 10 no. commercial/retail units.
Application Type:	Strategic Housing Development

Site Location and Description

The site is a 2.88 hectare site situated to the east of Connolly Station, south of Seville Place and southwest of existing two-storey houses at Oriel Hall off Oriel Street Upper. The site is bounded to the east by Oriel Street Upper, which has a mix of two and three-storey houses and apartment buildings on the opposite side, and by Sheriff Street Lower to the south. The site extends to a point at the junction of Oriel Street Upper and Sheriff Street Lower, with an existing single storey redbrick building in this area. The site then extends north and west along Sheriff Street Lower facing existing mixed use blocks dating from the 1990s on the south side of the street. The site includes an existing luggage store and workshop building which are set within the boundary wall, a protected structure, along the southern boundary of the site on the northern side of Sheriff Street Lower.

The bulk of the site is occupied by the car park of Connolly Station, which is accessed from Sheriff Street Lower. The site comprises of a sloped terrain which comprises of higher ground along the railway sidings and approximately 7m above the level of Sheriff Street Lower and Oriel Street Upper.

The site also includes a number of existing buildings associated with the railway, including warehouses and offices. These buildings are not protected structures. The planning statement submitted in conjunction with the application outlines that the site consists of 3 distinct elements which include the following:

- An area of 1.98ha which comprises the existing surface car park and attendant buildings
- The "air rights" to a 0.83 area above the existing rail sidings; and
- 0.07ha of land providing access on to Seville Place and Sheriff Street Lower.

Vehicular and pedestrian access to the site is currently provided via Sheriff Street Lower and Oriel Street Upper.

Proposed Development

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

- i. The demolition of 4 no. structures with a combined gross floor area of 3,028sq.m;
- ii. The construction of 741 no. Build to Rent (BTR) residential units in 8 no. apartment blocks ranging in height from 4 storeys to 23 storeys with lower height buildings located adjacent to the northeast and east site boundaries, with a cumulative gross floor area of 68,535sq.m comprising;
 - a. Block B1 (maximum building height 54.917m, total gross internal floor area 11,260sq.m, Apartment Mix: Studio: 25, 1-bed: 37, 2-bed: 51);
 - b. Block B2 (maximum building height 54.917m, total gross internal floor area 10,831sq.m, Apartment Mix: Studio:20, 1-bed: 35, 2-bed: 51);
 - c. Block B3 (maximum building height 51.767m, total gross internal floor area 9,766sq.m, Apartment Mix: Studio: 22, 1-bed: 60, 2-bed: 27, 3-bed:1);
 - d. Block C1 (maximum building height 79.450m, total gross internal floor area 12,705sq.m, Apartment Mix: Studio: 84, 1-bed: 40, 2-bed: 41);

- e. Block C2 (maximum building height 39.615m, total gross internal floor area 4,890sq.m, Apartment Mix: Studio: 9, 1-bed: 33, 2-bed: 3, 3-bed: 4);
- f. Block C3 (maximum building height 39.650m, total gross internal floor area 6,775sq.m, Apartment Mix: Studio: 40, 1-bed: 18, 2-bed: 23);
- g. Block D1 (maximum building height 53.392m, total gross internal floor area 8,418sq.m, Apartment Mix: Studio: 10, 1-bed: 25, 2-bed: 44, 3-bed: 1);
- h. Block D2 (maximum building height 30.950m, total gross internal floor area 3,890sq.m, Apartment Mix: Studio: 18, 1-bed: 8, 2-bed: 11);
- iii. Residential support amenities including 1 no. gym, a resident's lounge, work areas, meeting rooms, dining rooms, recreational areas with a combined GFA of 1,444sq.m;
- iv. Change of use from club house to pedestrian passageway of the existing vault (137sq.m GFA) fronting Seville Place, a Protected Structure (RPS No. 130);
- v. A basement of 7,253.4sq.m with a new vehicular access from Oriel Street Upper incorporating resident's car parking (58 no. spaces), residents cycle parking (640 no. spaces) 7 no. plant rooms (combined 2,228sq.m), waste management facilities (393sq.m)
- vi. 766 no. covered cycle parking spaces for residents and visitors, concierge office (233sq.m) and waste management facilities (126sq.m);
- vii. 'Other Uses' including 10 no. units providing retail, commercial, and community use with a combined GFA of 3,142sq.m;
- viii. A total of 18,562sq.m of hard and soft landscaping comprising a c.2,000sq.m public plaza and other public/communal and private open space located throughout the development;
- ix. A service and emergency vehicle only access ramp from Oriel Street Upper site entrance to serve CIE's transport needs at Connolly Station;
- x. Enabling works of a non-material nature to safeguard the existing vaults (Protected Structures - RPS No. 130) that form part of the subject site fronting Sheriff Street Lower, Oriel Street Upper, and Seville Place during the construction phase;
- xi. All associated ancillary development works including drainage, 6 no. electricity substations, pedestrian access; and
- xii. Works to the masonry wall fronting Oriel Street and the Vaults fronting Seville Place (both a Protected Structure) consisting of the creation of a new vehicular and pedestrian entrance.

Masterplan Approach

The application relates to permission for a 2.88ha site. The application relates to only part of the overall site identified within the application drawings. A Masterplan for the entire 2.88ha site has been prepared and is submitted in conjunction with the SHD application. The application documentation outlines that the proposal comprises of the residential elements of an intended wider mixed use development proposal for the site which will include office and hotel blocks and will be subject to a separate application to Dublin City Council. It is stated that the mixed use proposal is currently at the early stages of the design process but the following is considered for the purposes of the cumulative impact assessment set out within the EIAR:

- Block A – office block c. 23,300 sq.m. – 9 floors of office space over the Protected Structure – Luggage Store Building;
- Block D3 – Hotel c. 9,229 sq.m. – 12 floors;
- Block E- 6,988 sq.m. office building - 8 floors of office accommodation over the Protected Structure Workshop building;

The above development will be subject to a separate planning application to the Local Authority. The application documentation outlines that the SHD application includes the infrastructure for the entire site including main pedestrian streets, connections to the adjoining street network, drainage infrastructure and associated services.

Planning History

The site has the following planning history:

Register Reference 2863/11:

Ten-year permission granted to CIE Group Property Management for development of a 3.216 hectare site mainly comprising the existing CIE car park, CIE Group buildings, rolling stock maintenance shed, and part of existing railway lines / sidings; the site is bounded by Seville Place and Oriel Hall to the north, Sheriff Street Lower to the south, Oriel Street Upper to the east, and Connolly Station (protected

structure) to the west; development to consist of the redevelopment of the site to provide a total of 81,538m² of mixed commercial, residential (106 units, 3 x one-bed, 81 x two-bed, 22 x three-bed), community and leisure development comprising:

1. Demolition of the Central Train Control, former fastrack, Irish Rail Regional Building Maintenance, CIE Group IT and HR buildings and the Rolling Stock Maintenance shed currently on the site, and part demolition of vaulted warehouse buildings fronting Sheriff Street Lower;
2. Excavation of 1.78 hectares of the site to -4.2 metres OD to form a basement providing 550 car parking spaces (including 25 disabled parking spaces), 260 cycle parking spaces, 4 coach parking spaces, plant areas, building service areas, storage and refuse storage facilities;
3. Construction of a new street through the site linking the existing vehicular access to the site on Sheriff Street Lower and a signalised junction to be constructed on Seville Place at the junction of Coburg Place;
4. Construction of an access street to Connolly Station from the new street through the site;
5. Construction of 13 buildings comprising:
 - a) Block A - A six storey 7360m² hotel building involving a four-storey extension above the vaults of the former station luggage building (protected structure) to provide hotel bar / restaurant (968m²) and community/cultural uses (572m²) on street level fronting Sheriff Street Lower; hotel reception, lounge, function areas and terraces at first floor; and 110 hotel bedrooms in the floors above;
 - b) Block B/C - A five storey 5430m² building involving a four-storey extension above the existing vaults (protected structure) fronting Sheriff Street Lower to provide retail (990m²) and office uses (320m²) on street level; cafe / restaurant (102m²) and terrace and office use (1066m²) on first floor and 2,984m² of offices on second to fourth floors;
 - c) Block D - A five storey 7,573m² building with 543m² retail / restaurant uses at street level and 7,030m² offices above;
 - d) Block E - A six/seven storey 10,913m² building with retail/restaurant uses at street level, a leisure facility at street and first floor level and 8735m² offices above fronting onto the new street through the site with east facing roof terrace at fifth floor and south facing roof terrace at sixth floor level;
 - e) Block F/G - A five-storey 9,642m² office building above podium level partially over the existing railway lines/sidings comprising two blocks linked at three levels and including landscaped courtyards at podium level;
 - f) Block H - A seven storey 8,104m² office building fronting onto the new street through the site providing 1139m² of retail / restaurant space at street level and 6965m² office space above;
 - g) Block I - A five/seven storey 13,450m² office building at the junction of Seville Place and the new street through the site and partially over the existing railway lines / sidings, including the formation of a south facing roof terrace at fifth floor level and an east facing roof terrace at sixth floor level and the formation of a feature opening and windows in the existing boundary wall (protected structure) facing Seville Place;
 - h) Block J/K - A four/five storey block providing 522m² retail/restaurant and 940m² community/leisure uses at street level, and 33 two- bedroomed and three x three-bedroomed apartments partially constructed over the vaults (protected structure) facing Seville Place including terraces to each apartment facing north west towards the new internal street, facing north east towards Seville Place and into the landscaped internal courtyard and provision of children's play area on first floor roof on southern elevation;
 - i) Block L - A four/five/six storey block (recessed sixth level) providing 824m² retail/restaurant uses at street level with three x one-bedroomed, 23 x two-bedroomed and 11 s three-bedroomed apartments on the floors above including terraces to each apartment facing south west towards the new internal street and a roof terrace to each apartment on fifth floor level; and 4 no. two bedroom duplex apartments in two storey buildings in the internal courtyard;

- j) Block M - A two/three/five storey block providing four x two-bedroomed live-work units at street level with four x two-bedroomed and three x three-bedroomed apartments on the floors above including a terrace to each apartment on the north east elevation facing Oriel Street Upper and the formation of window openings and entrances in the existing boundary wall on Oriel Street Upper (protected structure);
 - k) Block N – Six-storey block (recessed sixth level) providing five x two-bedroomed live-work units and 87m² of retail/restaurant uses at street level and 17 x two-bedroomed and 5 x three-bedroomed apartments on the floors above including a terrace to each apartment on the southeast elevation facing Oriel Street Upper and on the south elevation facing Block O and the formation of window openings and entrances in the existing boundary wall on Oriel Street Upper (protected structure);
 - l) Block O - One/two storey extension above existing single storey building to be retained to form a two/three storey building providing 765m² of retail/restaurant space and two restaurant terraces, one on the northern and one southern elevation at first floor level.
 - m) A 505m² two storey crèche building and open space within the public space formed by Blocks K and L;
6. A 50m² single storey retail kiosk building in the public square;
 7. Enclosure of the rolling stock maintenance facility and railway sidings beneath the proposed podium structure extending c. 7,000m².
 8. The formation of public open spaces to the east of the new street through the site and between Blocks A and B/C and the provision of a pedestrian link between Sheriff Street Lower to the station access road through a courtyard between Block A and Block B/C; and pedestrian links between the development to Oriel Street Upper; and between Oriel Street Upper to Sheriff Street Lower.
 9. All other site works above and below ground required to facilitate the proposed development including 3 x 500kW biomass boilers and 2 x 450kW gas boilers in the basement, 7 electricity substations and hard and soft landscaping.

Observations

Third party submissions have been received from the following:

- Councillor Niall Ring, 70 Ballybough Road, Ballybough, Dublin 3
- North Wall Community Association, C/O Seville Place, North Wall, Dublin 1
- Sheriff Youth Club CLG, Commons Street, Dublin 1
- Tessa Boyd

The issues raised in the submissions include the following:

Councillor Niall Ring

- Excessive amount of studios and one bed units will attract transient population.
- Part V arrangement is of concern – the plan speaks of a 15 year leasing agreement which suggests and infers no security of tenure.
- Part V provision is skewed towards studio units with 36 of the 228 studio units being allocated.

North Wall Community Association

- Proposed development represents the last opportunity to turn around 30 years of social deprivation in the Sheriff Street/ North Wall Area.
- Question future of Sheriff Street.
- Excessive provision of studio units.
- Social housing content in Block C3 comprising 18no. one bed apartments and 23no. 2 bed apartments is unacceptable and of little value at a time when there is a need for family sized apartments.
- Questions 15 year long term leases agreement with developer – will units revert back to developer after this timeframe has lapsed.

- Building heights – serious consideration needs to be given to the existing residential areas surrounding the site including – Upper Oriel Street where St. Laurence O' Toole Court Old Folks Complex is situated and likewise on Oriel Hall.
- Serious concern in relation to the proposed 23 storey tower element of the proposal – question if Dublin Fire Brigade have the necessary equipment and expertise that would be required to deal with any unforeseen event.
- ABP requested to have regard to the Kieran Mulvey Report/Plan established with dealing with long terms anti-social issues in the North East Inner City- request ABP to consider a local employment clause in the instance that planning permission is granted for local employment/apprenticeships/training at construction phase.
- Traffic considerations of such a development to be considered.

Sheriff Youth Club CLG

- Existing facility comprises of the longest established community facility in the area
- Disappointed in relation to lack of consultation/engagement with club in relation to the proposal
- Club potentially important partner for new community
- Importance of re-incorporation of GAA and boxing club as part of development – refers to precedent in condition attached to PL29N.304710 for SHD application on East Road in terms of provision/relocation of men's shed facility
- Levies for community facilities to be paid prior to or early on in development process and earmarked for local community facilities
- Willing to engage with planning authority, developers and future residents of scheme to develop additional activities based on interests of future residents and strengthen sense of place which exists in the community

Tessa Boyd

- Positive impact for the community and Dublin in general
- Concerns re Traffic Impact and Parking – surrounding area acts as parking lot for businesses in vicinity. Adjoining road network occupied by 8am, delays during rush hour, TIA survey data based on one day which doesn't necessarily provide an accurate picture of area. Difficulty for residents to find parking, non-provision of parking is a serious oversight. Traffic light at Seville Place/Oriel Place are only pedestrian lights, strain on this intersection for cars turning across from Seville Place into Oriel Street. Proposed access will exacerbate the problem.
- Construction Hours: predefined construction hours should be agreed and adhered to minimise negative impact on surrounding residential area. Traffic impact of construction vehicles.

External Consultees/Interested Parties

The following provides a summary of the main points raised:

An Taisce and Cyclist.ie- the Irish Cycling Advocacy Network:

- Currently very limited amount of cycle parking at Connolly Station which is accessible to the public- highlighted as a serious gap in cycling provision in Dublin;
- Policy Objective 8.2 of the National Cycling Policy Framework states that high quality public cycle parking facilities should be provided at public transport stations
- Connolly Station is a strategic public transport hub
- Refers to Policy MT9 and Objective MT08 of the Dublin City Development Plan
- Recommend that An Bord Pleanála seek further clarification from CIE in relation to future high density bike parking facilities at Connolly Station
- Proposed Underground bike parking- provision of 1,406 cycle parking spaces is welcome, questions accessibility of spaces- car parking should be rearranged to facilitate clearer access to cycle parking spaces, bike ramp at 1.9m wide is insufficient for two way bicycle track- should be 2.5m at minimum
- 58 parking spaces for car sharing provision is welcome
- Concerns in relation to the proposed 180 spaces for CIE – construction of these spaces should be considered as part of the proposed development rather than an existing use as the spaces do not currently exist- No clarity of justification is provided in relation to the use of these car parking spaces. No management plan is provided in relation to the spaces

- Existing cycling facilities around the proposed development are substandard – safety issues on adjoining road network identified
- Consideration should be given to connecting cycle lanes on Seville Place to the cycle lane through Connolly Quarter's Square to the underground car parking

Commission for Railway Regulation

- Request Iarnród Éireann is informed of decision
- Risks associated with railway pass should not be increased near the project
- Works should be undertaken in consultation with Iarnród Éireann and in accordance with RSC Guidelines RSC-G-010-A
- In the event that permission is granted the developer should consult with IE regarding rail road interfaces on access routes which may have increased flow or abnormal loads during the construction phase and upon completion of the project

Department of Culture, Heritage and the Gaeltacht

- Department has examined the Cultural Heritage Chapter of the EIAR – no archaeological objections subject to implementation of proposed mitigation measures at construction phases as conditions
- The Department recommends that the applicants engage the services of a suitably qualified archaeologist to co-ordinate the mitigation proposals contained in the report for archaeological monitoring of all groundworks. The archaeological method statement for the mitigation shall be agreed with the Department of Culture, Heritage and the Gaeltacht in advance of the commencement of construction works.

Cyclist.ie

- As per points raised in submission from An Taisce and Cyclist.ie above.

Irish Aviation Authority:

- Developer should engage with Dublin Airport to assess whether the proposed permanent structure would have any impact on flight procedures at Dublin Airport
- In the event that planning consent being granted, the applicant should engage with Dublin Airport to ensure that any crane operations do not impact on flight procedures. Should permission be granted, the applicant/developer should be conditioned to contact the Authority of intention to commence crane operations with a minimum of 30 days prior notification of their erection

Irish Water:

- Submission received; based on the details provided it is considered that, subject to a valid connection agreement between the developer and Irish Water, the proposed connections to Irish Water networks can be facilitated.

National Transport Authority:

- Supports principle of proposed development – represents the consolidation of development at a high density into Dublin City Centre
- Entire masterplan will deliver a quantum and intensity of development that would be deemed appropriate for a site with such a high level of public transport connectivity
- NTA in cooperation with Irish Rail are in the process of developing a project increasing the capacity of Connolly Station in order to cater for increased number of train services being planned as part of the DART Expansion Programme and as further capacity is added to the national and regional rail network
- The NTA are satisfied that the transport requirements of Connolly will be catered for by the proposed development

Transport Infrastructure Ireland:

- Submission received; note site is within area of Section 49 light rail levy scheme; recommend that, unless exempt, a levy condition be attached to any grant of permission.

Pre-Application Consultations

Pre-application meetings were held in the offices of the planning authority, on 30 August 2018, 16 October 2018, 20 November 2018, 23 November 2018, 17 December 2018, 30 January 2019, 20 February 2019, 12 March 2019 and 28 March 2019. Meetings were also held with Dublin City Council Parks Division.

Tripartite meeting with An Bord Pleanála on the 29th May 2019.

Central Area Committee

A presentation of the application was made to the area committee on the 12th of November 2019. Minutes of this meeting are attached as Appendix 1 of this report.

Interdepartmental Reports

Archaeology:

A report has been received from the City Archaeologist. No objection is raised in relation to the proposal subject to compliance with suggested mitigation and monitoring set out within the EIAR.

City Architects:

A report has been received from the City Architects Department. This provides a detailed assessment of the proposed development and raises a number of concerns in relation to layout, design and quality of proposed public realm and amenity spaces.

Transportation Planning:

The report from the Transportation Planning Division raises concerns in relation to the proposed CIE car parking spaces, proposed access arrangements and impact of development on surrounding road network.

Drainage Division:

Report received 28.11.19. No objection subject to conditions.

Environmental Health Officer – Air Quality and Noise Monitoring Unit

Report received. Noise assessment considered insufficient and further detailed study required.

Parks and Landscaping

Report received. Concerns raised in relation to the quality of the proposed public realm and amenity spaces. Conditions recommended.

Biodiversity Officer

Report received. Conditions recommended.

Conservation Officer:

Report received 10th of December 2019. Conditions recommended.

Waste Management Division:

Report received 27.11.19. No objection subject to condition.

Housing and Community Services:

Report received 21st of October 2019. Confirms that the applicant's agent engaged in consultation with Housing Department in relation to proposal and are aware of Part V obligations in the instance that planning permission is granted.

Planning Policy Context

Dublin City Development Plan 2016-2022

Relevant Policies and Guidance :

- Policies QH5, QH6, QH7, QH8, QH9, QH10, QH11
- Section 16.4
- Policies CHC1 and CHC2

Zoning:

The site is zoned objective Z5 – 'to consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity'.

Section 14.8.5 of the plan states that the primary purpose of the Z5 zoning is 'to sustain life within the centre of the city through intensive mixed use development' and 'to provide a dynamic mix of uses, which interact with each other, help create a sense of community and which sustain the vitality of the inner city both by day and night'.

In recognition of the growing residential communities within the city centre, it is stated that adequate noise reduction measures must be incorporated into developments, while regard should also be given to hours of operation. It is stated that, ideally, the mix of uses should occur both vertically through the floors of the building and horizontally along the street frontage. A general mix of uses including residential is desirable; however, retail should be the predominant use at ground floor level on principal shopping streets. Residential use is permissible in principle within the zoning, as is retail use (district, neighbourhood or major comparison) and community use.

Designations:

Connolly Station is designated as a Protected Structure – Ref 130 which is identified in Volume 4 of the Dublin City Development Plan (Record of Protected Structures) as "all 19th Century portions of main railway station complex".

Strategic Development Regeneration Area 6 Objectives

The site is furthermore identified within a Strategic Development and Regeneration Areas (SDRAs) as identified in Map K of the Dublin City Development Plan. The site is situated in SDRA 6 – Docklands, including SDZ area and Poolbeg West. Guiding principles for SDRA 6 include the following:

- Social sustainability is central to the regeneration strategy;
- Opportunity to create an exemplary model of good neighbourhoods and successful placemaking;
- Holistic approach to housing, achieving successful integration of residential, neighbours and the wider community;
- Achieving successful interaction between the SDZ scheme and surrounding streets and public realm to retain and foster a strong sense of neighbourhood within communities;
- Safeguard residential amenity and ensure appropriate transition in scale, with design of new developments to have regard to the context, setting and amenity of existing housing within the SDZ and wider Docklands area;
- To encourage local employment and explore new opportunities for local employment, both in the construction sector and elsewhere;

- All new developments to provide a minimum of 5% of space for social, cultural, creative and artistic purposes;
- Social infrastructure and community facilities to be provided in accordance with the infrastructure schedule set out in Appendix 4 of the North Lotts and Grand Canal SDZ Planning Scheme.
- Promotion of Docklands as a location for sustainable tourism including cultural, recreational and business tourism;
- Promote the development of retail use to serve existing residential communities, new residents and visitors;
- To support sustainable transportation initiatives and recognise and promote the potential for walking and cycling;
- To continue to secure the distribution of residential use throughout the Docklands by requiring an appropriate residential/commercial land use mix;
- To ensure that the public realm operates as a connected network of social spaces and to create a unique sense of place;
- To use street furniture, informal spaces, pocket parks, civic spaces and the spaces between buildings, and to promote opportunities for increased interaction and mobility within the Docklands;
- To integrate the public realm, streets and routes of Docklands with the surrounding city.

Plot Ratio and Site Coverage:

The indicative plot ratio for sites with Z5 zoning is between 2.5 and 3.0 while the indicative site coverage is 90%.

Section 16.5 of the plan outlines that a higher plot ratio may be permitted in certain circumstances, including adjoining major public transport termini and corridors (where an appropriate mix of residential and commercial is provided), to facilitate comprehensive redevelopment in areas in need of urban renewal, to maintain existing streetscape profiles, to facilitate the strategic role of institutions such as hospitals, or where a site already has the benefit of a higher plot ratio.

Residential Standards

The floor area standards for new apartments are currently set out in the DOHPLG document – 'Sustainable Urban Housing: Design Standards for New Apartments' (December 2015, updated 2018). The minimum floor area for a studio apartment is 37m², for a one-bedroomed apartment is 45m², for a two-bedroomed apartment is 73m² and for a three-bedroomed apartment is 90m². In developments of 10 units or more, the majority of all units must exceed the minimum floor area by 10%. Studio apartments must be included in the total, but are not calculable as units that exceed that the minimum by at least 10%. In certain circumstances, a two-bedroomed, three-person apartment with a minimum floor area of 63m² may be permitted. The requirement for the majority of all apartments in a proposed scheme to exceed the minimum floor area standard for any combination of the relevant one, two or three-bedroomed unit types by a minimum of 10% does not apply to any proposal with less than ten residential units.

At least 33% of units should be dual aspect in more central and accessible, and some intermediate, locations, defined as on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design. Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective to have a minimum of 50% dual aspect apartments, while any three-bedroomed apartments should ideally be dual aspect. Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature. Particular care is needed where

windows are located on lower floors that may be overshadowed by adjoining buildings. Dual aspect apartments can include corner units. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect units below the 33% minimum on a case-by-case basis, subject to overall design quality in other regards.

In relation to unit mix, apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios), while there is no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment or housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA) which has been agreed and incorporated into the relevant development plan.

Private open space of 4m² per unit is required in the case of studios, 5m² per unit for one-bedroomed, 7m² for two-bedroomed and 9m² for three-bedroomed apartments. A further 4m² of communal open space per unit is required in the case of studios, 5m² per unit in the case of one-bedroomed apartments, 7m² for two-bedroomed apartments and 9m² for three-bedroomed apartments. A minimum depth of 1.5m is required for balconies. Internal storage of 3m² is required for studio and one-bedroomed apartments, 6m² for two-bedroomed apartments and 9m² for three-bedroomed apartments with individual storage rooms not to exceed 3.5m².

Section 16.10.3 of the development plan also states that 10% of the site area should be reserved for public open space (i.e. amenity space which is publicly accessible and contributes to the city's network of public spaces). While this should normally be located on site, it is noted that in some instances it may be more appropriate to seek a financial contribution towards its provision elsewhere in the vicinity; this would include cases where it is not feasible, due to site constraints, to locate the space on the site, or where the needs of the population would be better served by the provision of a new park elsewhere in the vicinity. It is stated that, in such cases, financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the Dublin City Council Parks Programme.

Build to Rent Developments

The 2018 departmental guidelines also include guidance on build to rent developments, which were included on foot of departmental circular PL 11/2016. Build to rent developments are defined as 'purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord'. Characteristics of such developments include ownership (development retained in the ownership of a single entity and not let or sold separately) and provision of dedicated amenities and facilities for residents, which contribute to the provision of a shared environment and sense of community. Examples of the type of on-site amenities provided include dedicated laundry facilities, communal leisure areas, gym, workspaces or hot desks and concierge services, while developments may also include private dining or kitchen areas, offices or reception rooms which may be booked by residents where required, thus reducing the need for space within the apartments themselves. Build-to-rent developments can provide housing more quickly because they are owned by a single entity, with no need to be sold to individual owners or landlords.

Specific planning policy requirement (SPPR) 7 of the guidelines states that applications for build-to-rent developments should be accompanied by a proposed covenant or legal agreement, further to which the planning authority may attach conditions, including those requiring the development to remain owned and occupied by an institutional entity for a minimum period of not less than 15 years, following which the units may be let or sold individually. Applications should also include proposals for supporting shared and recreational amenities, to include resident support facilities (e.g. laundry, concierge/management facilities, maintenance, waste management) and resident services and amenities (e.g. recreational facilities, shared tv/lounge areas, work/study spaces or dining/function rooms). It is stated that the nature and extent of these amenities may be agreed with the planning authority, having regard to the scale, location and market for the proposed development, with evidence to be provided that the proposed facilities are appropriate to the development.

SPPR8 states that no restrictions on dwelling mix will apply to build to rent developments although all other requirements apply unless stated otherwise. Flexibility may be provided in relation to a proportion of the storage and private open space requirements for a development and all of the communal open space; however, this is predicated on the provision of alternative, compensatory, communal support facilities and amenities within the development, and is at the discretion of the planning authority. The onus will be on

the applicant to demonstrate that a sufficient overall quality of facilities and standard of residential amenity can be provided. Car parking may be minimised or significantly reduced, while the requirement for the majority of units in a development to exceed 10% of the minimum floor area, and the requirement for a maximum of twelve apartments per floor per core, do not apply.

Height

Development Plan

Section 16.7.2 of the Dublin City Development Plan states that planning applications will be assessed against the building heights and development plan principles established in the relevant LAP/SDZ/SDRA. It is stated that proposals for high buildings should be in accordance with the provisions for the relevant LAP/SDZ/SDRA in addition to the assessment criteria for high buildings and development plan standards. Connolly is identified as a high rise area, where building heights of 50m-plus are permissible in principle. All proposals for mid-rise and taller buildings must have regard to the following assessment criteria:

- Relationship to context, including topography, built form and skyline, having regard to the need to protect important views, landmarks, prospects and vistas.
- Effect on the historic environment at a city-wide and local level.
- Relationship to transport infrastructure, particularly public transport.
- Architectural elegance of a building which is of slender proportions, with a slenderness ratio of 3:1 or more to be aimed for.
- Contribution to public spaces and facilities.
- Effect on the local environment, including microclimate and general amenity considerations.
- Contribution to permeability and legibility of the site and the wider area.
- Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, 360-degree view analysis, shadow analysis, wind analysis etc.
- Best practice guidance related to sustainable design and construction of tall buildings.
- Evaluation of how to provide a similar density in an alternative urban form.

National Policy

In December 2018 the Department of Housing, Planning and Local Government issued statutory guidelines for planning authorities on Urban Development and Building Heights. The Guidelines favour a performance driven approach in relation to determining building heights, with no maximum height standard. It is noted that the guidelines should be considered in conjunction with other policy guidelines, including Sustainable Urban Housing: Design Standards for New Apartments (2018), Quality Housing for Sustainable Communities (2007), Sustainable Residential Development in Urban Areas (2009), the Design Manual for Urban Roads and Streets (DMURS) (2013), the Retail Design Manual (2012) and the Urban Design Manual (2009). The guidelines set out specific planning policy requirements (SPPRs) in relation to building height, together with assessment criteria for buildings taller than the prevailing height in an area.

It is noted that it is an objective of the National Planning Framework, which is part of Project Ireland 2040, that at least half of the future growth of the main cities will be delivered within their existing built-up areas through infill and brownfield development. This development should take place in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities. The guidelines also note the objectives of the National Planning Framework in relation to growth in cities (NPO 2(a)), brownfield redevelopment targets (NPO 3(a), (b) and (c)), attractive, well-designed liveable neighbourhoods (NPO 4), scale and quality of urban development (NPO 5) and increasing residential population and employment in urban areas (NPO 6). Building height is also seen as an important measure for urban areas to deliver and achieve compact growth as required. NPO 13 is that:

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

It is stated that, in order to meet the objectives of the National Planning Framework, significant increases in building heights and overall building densities need to be not only facilitated but actively sought out and

brought forward by the planning process, particularly at local authority and An Bord Pleanála level, with increasing building heights having a critical role to play in delivering more compact growth in urban areas.

Section 2.8 of the guidelines notes that historic environments can be sensitive to large scale and tall buildings; in that context, planning authorities must determine whether buildings of increased height are an appropriate typology in particular settings.

Assessment criteria for buildings taller than the prevailing height in an area are set out in Section 3 of the guidelines. Broad principles to be followed include whether the proposal positively assists in securing National Planning Framework objectives in relation to focussing development in key urban centres, whether the proposal is in line with the policies of the relevant development plan, where this has taken clear account of the requirements set out in Section 2 and, where a development plan predates the guidelines, where it can be demonstrated that the implementation of the pre-existing policies and objectives of the relevant plan or planning scheme do not align with or support the objectives and policies of the NPF.

SPPR3 of the guidelines states that, where an application for permission sets out how a development proposal complies with the above criteria and the assessment of the planning authority concurs with the findings, taking into account the wider strategic and national policy parameters, the planning authority may approve such development even where specific objectives of the development plan or a local area plan indicate otherwise.

Appropriate Assessment Screening

A Screening Statement for Appropriate Assessment undertaken by Openfield Ecological Services is submitted with the application. This identifies that the proposed development site is not located within or adjacent to any SAC or SPA.

The conclusion of the Screening Statement states that *“the project has been screened for AA under the appropriate methodology. It has found that significant effects are not likely to arise, either alone or in combination with other plans or projects to the integrity of the Natura 2000 network”*.

The AA Screening report has been subject to review by the Biodiversity officer in DCC. No objection has been raised in relation to the content, scope or conclusions of the study. Having reviewed the Screening report, which has been reviewed by Parks and Landscape Services, the Planning Authority concur with the conclusions reached and have no reason to deviate from the results of the assessment.

Environmental Impact Assessment Report

An environmental impact assessment report (EIAR) has been submitted in conjunction with the application documentation. This notes that under Schedule 5, Part 2 of the Planning and Development Regulations (2001, as amended), developments comprising construction of more than 500 dwelling units require an EIAR. Under Class 10 (b) (iv) urban development involving an area greater than 2 hectares in the case of business district, 10ha in the case of a built-up area and 20ha elsewhere also requires an EIAR. Section 1.5 of the EIAR outlines that the proposed development which includes the provision of 741 no. units and on an inner city site of 2.88ha exceeds the thresholds established for mandatory EIAR. The planning authority concurs with this conclusion.

Assessment of EIAR & Requirements

The EIA Directive 2014/52/EU, (the Directive) and Section 172 of the Planning & Development Act 2000 (as amended) require that an assessment of environmental effects of a project are carried out by the competent authority –which in this instance is An Bord Pleanála. Article 5(1)(a) to (f) of the Directive sets out the matters to be addressed by the developer/applicant in the EIAR. At the very least the EIAR must contain the following;

- a) A description of the project comprising information on the site, design, size and any other relevant features of the project;
- b) A description of the likely significant effects of the project on the environment;
- c) A description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;

- d) A description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;
- e) A non-technical summary of the information referred to in points (a) to (d)
- f) Any additional information specified in Annex IV of the Directive/Schedule 6 to the 2001 Regulations, as amended, relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

The EIAR must also include a list of the experts who have contributed to its preparation. The 2011 Directive, as amended, specifies that the EIAR must include information that may reasonably be required for reaching a reasoned conclusion on the significant effects of the project on the environment, taking into account current knowledge and methods of assessment.

The EIAR has been reviewed with regard to the relevant legislation and guidance for Competent Authorities. The following comments relate to and are relevant to this review.

Scoping

Section 1.10 of the EIAR outlines that the scope of the EIAR was informed by the requirements of the Directive 2014/52/EU and the transposing regulations. It is stated that the scope of the documentation was furthermore informed by the advice received from the specialist team engaged to prepare the EIAR and the guidance provided by Dublin City Council during section 247 pre application meetings and guidance provided by An Bord Pleanála during the Pre Application Consultation process.

Content & Preparation – Issues arising

Section 1.9 relates to the format and structure of the EIAR. This outlines that the document is prepared on the basis of a "Grouped Format Structure". The report is subdivided into 3 volumes including Volume I: Non-Technical Summary, Volume II: EIAR, Volume III Appendices. The following chapters are included within Volume II:

- Introduction
- Project Description
- Alternatives Considered
- Population and Human Health
- Landscape and Visual
- Material Assets: Traffic
- Material Assets: Built Heritage
- Land and Soils
- Water and Hydrology
- Biodiversity: Bat Report
- Noise and Vibration
- Air Quality and Climate
- Cultural Heritage: Archaeology
- Cultural Heritage: Architecture
- Interactions of Foregoing
- Summary of Mitigation Measures

Content of Chapters and Assessment

Chapters 1- 2:

These introductory chapters provide the background information to the existing environment within the development site and within the surrounding area. A detailed description of the development is provided and outlines each element of the proposal. Chapter 1 provides an introduction to site and proposal and includes details of the masterplan approach for the entire site. In this regard it is stated that the proposal constitutes the residential elements of an intended wider development proposal that will include office and hotel blocks. The information provided by the applicant in these initial chapters is considered to be satisfactory.

Chapter 3: Alternatives Considered

A justification for the development of the site is set out in Chapter 3 of the EIAR on the basis of its brownfield, inner city location adjacent to a public transportation hub. Alternative proposals are considered including a “do nothing scenario” and implementation of the existing permission pertaining to the site (Register Reference 2863/11). In this regard it is stated that the *“proposed development was selected as the optimum alternative as it responds to the current housing crises that exists within the City”*. The information therefore presented within the application is considered to be satisfactory, the provision of high density residential development on the site together with a mix of uses is supported by the planning authority and in accordance with the zoning objectives pertaining to the site.

Chapter 4: Population and Human Health

In relation to population and human health, Chapter 4 of the EIAR includes a demographic assessment of the baseline environment of the surrounding area having regard to the information contained within the 2006, 2011 and 2016 Census for the North Dock B and North Dock C ED's. Table 4.4 identifies that a high proportion of the population are within the 20-40 age group (62.5%) and 67.7% of residents within the area are classified as single within the 2016 Census and a justification for the proposed mix of units within the scheme is provided in this regard.

The potential impacts of the proposal are considered under the headings of land use, human health impacts, population and economic activity impacts and local amenity impacts at both construction and operational phase of the development. The EIAR concludes that the operational phase of the proposed development will have a significant positive impact through the provision of residential development and regeneration of an underutilised brownfield inner city site in accordance with local, regional and national objectives. It is furthermore noted that adherence to construction phase mitigation measures as detailed within the EIAR will ensure that the construction phase of the development will have an imperceptible and neutral impact in terms of health and safety.

Chapter 4 includes cross reference to the Sunlight and Daylight Assessment prepared by IES submitted in support of the application and other chapters of the EIAR including noise, traffic and air quality wherein the impact on population and human health are addressed. The information provided by the applicant in Chapter 4 is considered satisfactory. Potential impacts associated with the proposal including noise, traffic, construction, visual and impact on sunlight and daylight are addressed in later sections of this report.

Chapter 5: Landscape and Visual Impact

Chapter 5 of the EIAR provides an assessment of the potential impacts of the proposed development on the landscape and views/visual amenity of the receiving environment. A Landscape and Visual Impact Assessment (LVIA) of the proposed development during both the construction and operational stages is undertaken. The LVIA is accompanied by and cross refers to a series of 39 no. photomontages which assess the long range visibility of the development from key vistas and impacts of the proposal on the surrounding streetscape.

The submitted assessment concludes that during the construction stage the immediate environs of the site would be disturbed due and impacts are identified as significant and negative although temporary. At operational stage it is concluded that the proposal represents a very significant townscape and visual change which are considered positive on the basis that they are supported by policy and the proposal provides an appropriate response to sensitivities and opportunities presented by the townscape context.

A detailed assessment of visual impact of the proposal is provided within the assessment section of this report. The planning authority is satisfied with the scope and content of the LVIA, the series of photomontages provided and the range of issues addressed.

Chapter 6: Material Assets: Traffic and Transport

Chapter 6 of the EIAR assesses the potential impact of the proposed development in terms of traffic and transportation. The TTA refers to the existing use of the lands as car parking for CIE and notes that this will be reduced to 180 no. spaces. Access to the site is currently provided via Sheriff Street Upper. Section 6.5.2 of the assessment outlines that Irish rail car parking will continue to be a trip generator to the site but via a new entrance from Oriel Street.

The TTA refers to the operational phase impact of the development as being negligible and slightly negative due to construction works on the adjoining road network but such works are identified as being temporary in nature. In terms of the operational phase of the development it is stated that the increase in traffic as a result of the development would be minimal. Advantages associated with increased permeability to the site are identified.

Chapter 6 of the EIAR has been subject to review by the Transportation Planning Division in Dublin City Council. The detailed report prepared in relation to the proposal is attached as Appendix 2 to this report. The assessment concludes the following in respect of the TIA.

The Traffic Impact Assessment (TIA), which also forms Chapter 6 of the Environmental Impact Assessment Report (EIAR), has reviewed and analysed the overall Connolly Station redevelopment i.e. the proposed SHD development and the Section 34 application for the hotel and office development. The estimated Trip Generation has increased for the overall development from that presented in the TIA at pre-application consultation stage. At Pre-Application stage, it was estimated that the residential element of the proposed development would have approximately 342 daily arrivals and 373 daily departures. In the current application, the TIA states that the residential element of the proposed development would have an estimated daily arrival of 363 trips with 396 departures; resulting in an estimated increase of an additional 44 daily trips. This information however appears to conflict given that the proposed development has provided a significantly reduced provision of residential parking and the typology proposed (i.e. car share) and in turn, one would expect a reduction in the estimated daily trips generated. In the context of the overall Masterplan, it has been stated in the TIA that the entire site is expected to generate approximately 2,198 additional trips per day, an increase from the 2,153 additional trips detailed in the Pre-Application TIA. The TIA does note that the cumulative trip generation for the apartments is considerably beyond the proposed parking allocation meaning the estimates are highlighted as being conservative. However, it is noted that the expected AM peak hour (7-8am) would have approximately 101 arrivals and 84 departures, with the PM peak hour (4.15-5.15pm) having approximately 74 arrivals and 117 departures and therefore would not appear to accurately reflect the revised typology of residential car parking proposed for this development i.e. car sharing.

The Car Parking Strategy noted in the TIA states that access to the car park will be restricted to car club vehicles only and a barrier system will be in place at the entrance/exit to facilitate this. A clamping system will be in place throughout the site whereby any cars parked in an unapproved location will be clamped. It is stated that from initial contact with prospective tenants, it will be made clear that there is no private car parking available on site. No reference has been made in the Car Parking Strategy to the car parking spaces that are to be made available to CIE/Irish Rail.

With regards to the 180 car parking spaces (135 of which are provided as part of this SHD application) to be made available to CIE/Irish Rail, the TIA states that the reduced allocation of Irish Rail car parking will continue to be a trip generator but re-routed through the new access on Oriel Street. The associated revised trip patterns of the reduced Irish Rail car parking have been developed on a pro-rata basis using the traffic survey data from the existing car park entrance. All of the information contained within the TIA in the context of traffic surveys (October 2018), trip generation patterns and junction analysis remains unchanged from that submitted in the Pre-Application TIA. This division would therefore have concerns with regards to the validity of the data taking into consideration the changes between the Pre-Application Consultation and the proposed development in this application i.e. increase in residential units, reduction in car parking spaces and changes to car parking typology (car share) proposed.

Having regard to the above reasons and considerations, the planning authority has concerns in relation to the assumptions presented within Chapter 6 of the EIAR which would require further clarification. This point is addressed in further detail in the assessment section of this report.

Chapter 7: Material Assets: Built Services

Chapter 7 of the EIAR relates to the material assets of surface water drainage, foul water drainage, water supply and utilities in respect of the subject lands. An assessment of the impact of the proposed development on built services at construction and operational phase of the development is undertaken.

At construction phase it is stated that construction related mitigation measures will be implemented to negate against impact on existing utilities and services.

At operational stage it is concluded that the proposed surface water drainage which incorporates SUDS measures provides an inherent improvement from the existing surface water scenario. The proposed

development will increase the quantity of wastewater discharged to the receiving wastewater sewerage network including Mayor Street Pumping Station and Ringsend Wastewater Treatment works. A new connection to existing watermains is proposed as part of the subject application and impacts of this connection are identified as neutral. Electricity, gas and telecommunications accommodation for the proposed development will be agreed and accommodated by relevant utility providers.

Chapter 7 of the EIAR has been subject to review by the Drainage Planning Division in Dublin City Council. No objection is raised in respect of the proposal subject to conditions. Furthermore the submission received by Irish Water does not raise objection to the proposal.

Chapter 8: Land and Soils

Chapter 8 of the EIAR relates to land and soils. This outlines that an assessment of the existing soils, geology and hydrogeology was carried out based on data collected from a detailed desk study, site investigations and assessments. This assessment outlines that the potential impacts of the proposed development relate to the following:

- Excavation of topsoil and subsoil and its reuse/ recovery/disposal off site;
- Accidental spills or leaks of construction related material;
- Discharge of dewatering groundwater to the public sewer;

It is stated that the impacts of the proposal are limited to the construction phase of the development and primarily related to the excavation of soil which is unavoidable. The EIAR outlines that the significance of the excavation impact has been reduced through minimising the basement area required for the development.

Chapter 8 of the EIAR has been subject to review by the Waste Management Section and Drainage Section of Dublin City Council. No objection has been raised in relation to the proposal subject to compliance with conditions in the instance that planning permission is granted.

Chapter 9: Water and Hydrology

Chapter 9 of the EIAR assesses issues relating to water and hydrology in respect of the subject lands and assesses the impact of the proposed development on these aspects of the existing environment. Chapter 9 of the EIAR has been subject to review by the Drainage Planning Division in Dublin City Council. No objection is raised in respect of the proposal subject to condition.

Chapter 10: Biodiversity

Chapter 10 of the EIAR relates to biodiversity and outlines that the application site is not located within or adjacent any area that is designated for nature conservation at a national or international level. A site survey was undertaken on the site and no constraints to a full assessment of biodiversity were encountered. No alien invasive plant species were identified or no plants or habits of conservation value were identified. The assessment refers to a bat survey undertaken on the site during optimal survey period which identifies no evidence of roosting bats and low level of general activity.

The assessment concludes that with mitigation in place residual impacts to biodiversity at operational phase of the development will be permanent, neutral and imperceptible. It is concluded that impacts from the construction phase of the development will be short term, neutral and not significant.

The biodiversity section of the EIAR has been subject to review by the Biodiversity Officer in the Parks and Landscaping Department of Dublin City Council. The Biodiversity Officers report raises concern in relation to the timeframe in which the invasive species and bat survey were undertaken. Concern is also raised in relation to whether the detailed design of the proposal has been informed by the biodiversity mitigation measures detailed within the EIAR, specific reference is made to lighting proposals in this regard. It is considered that such concerns could be addressed by means of condition in the instance that planning permission is granted for the development. Conditions are recommended to address these concerns including revised lighting proposals, a bat survey and bird surveys.

Chapter 11: Noise and Vibration

Chapter 11 of the EIAR sets out the likely significant effects from both the construction and operational phases of the development on noise and vibration on future residential of the site (operational phase) and

at nearest noise sensitive receptors. Nearest noise sensitive receptors in the vicinity of the site are identified along the eastern boundary of the site including Oriel Hall, Oriel Street Upper and Sheriff Street Lower. The assessment concludes that during construction phase of the development predicted noise impacts will be neutral.

The assessment concludes the following in respect of the impact of existing and proposed transportation noise sources on the proposed residential development:

"The ProPG Noise Risk Impact has been found to be" Low Range" during the day and "Mid-Range" night, indicating an Acoustic Design Statement is required at the reserved matters stage.

Further to appropriate mitigation measures being incorporated into the proposed development, it was found that operational noise from the proposed development is likely to have a low impact during both the daytime and night-time periods".

No significant impacts associated with the operational phase of the development at identified at noise sensitive receptors.

Chapter 11 of the EIAR has been subject to review by the Environmental Health Officer within the Air Quality Control and Noise Monitoring Unit in DCC. The report concludes the following in respect of the proposal:

"The Noise management measures are not satisfactory during the operational phase. Consider greater management plans for those dwellings situated closest to railway lines. While double glazed windows may be satisfactory, triple glazed is advised to mitigate the nuisance likely to arise from railway noise"

As detailed above noise issues are unresolved and a further detailed mitigation is required. This above point could be addressed by means of condition in the instance that planning permission is granted for the development.

Chapter 12: Air Quality and Climate

Chapter 12 of the EIAR assesses the potential short term impacts associated with dust from the construction phase of the site and longer term impact from traffic related pollutants at the operational phase of the development. The assessment concludes that: *"taking into consideration the original risk assessment of the proposed construction works and further to mitigation being enacted, it is concluded that no significant impacts will result because of the proposed development"*.

The scope of Chapter 12 appears to be limited in terms of the operational stage of the development. No information is provided in relation to the microclimate of the proposed development. However as detailed within the assessment section of the report a pedestrian comfort study is submitted as a separate report submitted with the application documentation and in this regard the information submitted with the application could be considered as sufficient. The details set out within this study are addressed within the assessment section of this report.

Chapter 13: Cultural Heritage, Archaeology

Chapter 13 of the EIAR relates to Cultural Heritage and Archaeology. The scope and content of this chapter has been subject to review from the City Archaeologist. A report has been received from the City Archaeologist, this outlines the following in respect of the proposal:

"It is noted that the proposed development is located 100m east of the Zone of Archaeological Constraint for the Recorded Monument DU018-020 (Dublin City), which is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.

The subject site is located on land reclaimed for industrial use from the 18th century onwards, which is characteristic of the George's Dock and Spencer's Dock area located to the south and southeast of the proposed site. The Dublin City Industrial Heritage Record lists three mid- 19th-century good sheds located within the subject site (Ref. 180801801, 180801701 and 180801601), two of which are extant. The subsurface remains of other features of industrial heritage interest may survive within the subject site.

The proposed site is one of archaeological potential due to the proximity of the River Liffey and the estuarine levels that underlie the site, which will be impacted upon by the basement level of the proposed development. Prehistoric remains have been recorded in estuarine silt layers elsewhere on the north side of the river. This has been illustrated by the discovery of Mesolithic fish traps during the development of the Spencer Dock area, c. 500m to the southeast of the proposed development area (McQuade 2008, Licence Ref.: 03E0654). Other marine archaeological features, such as shipwrecks, may also survive within the estuarine deposits that underlie the site.

A chapter assessing the potential impact of the proposed development on possible subsurface archaeological features/deposits was included in the EIAR. This office concurs with the suggested mitigation of archaeological monitoring outlined in this report”.

The submission on the application from the Department of Culture, Heritage and the Gaeltacht is furthermore noted. No objections to the proposal are raised within this submission subject to implementation of proposed mitigation measures at construction phases as conditions. In this regard, the submission recommends that the applicants engage the services of a suitably qualified archaeologist to co-ordinate the mitigation proposals contained in the report for archaeological monitoring of all groundworks. The archaeological method statement for the mitigation shall be agreed with the Department of Culture, Heritage and the Gaeltacht in advance of the commencement of construction works.

Having regard to the above, the planning authority is satisfied with the scope and conclusions of Chapter 13 of the EIAR.

Chapter 14: Built Heritage: Architectural

Chapter 14 of the EIAR provides an assessment of the historic environment of the site, evaluates the potential impacts that the proposed development might have on the architectural heritage of the site and its wider urban context. Chapter 14 cross refers to the detailed Architectural Heritage Assessment Report which is submitted in conjunction with the application. In terms of the existing character of the site Chapter 14 identifies that the existing character and architectural quality of the site is poor with the exception of the retaining walls and buildings along Sheriff Street Lower.

Works proposed include the demolition of Oriel House and a number of 20th century buildings on the site and provision of new openings on the stone boundary wall on Sheriff Street Lower and Oriel Street Upper, it is also proposed to incorporate an existing vault at Seville Place to provide a pedestrian entrance. Chapter 14 includes reference to a series of photomontages undertaken to illustrate the impact of the proposal from historic views. In this regard it is stated that with the exception of Talbot Street, significant historic vantage points experience no change. Operational phase impacts of the proposed development are identified as neutral and positive within the assessment. The planning authority is satisfied with the scope, content and conclusions of Chapter 14 of the EIAR.

An assessment of Chapter 14 of the EIAR has been undertaken by the Conservation Officer. The proposed demolition of Oriel House is accepted subject to salvage and reuse of materials which can be addressed via condition. Further comments raised by the conservation Officer are addressed within the assessment section of this report.

Chapter 15: Interactions of the Foregoing

Chapter 15 of the EIAR refers to potential interactions of impacts between each of the EIAR sections. On an overall basis, some of the assessment of potential interactions identified within this Chapter are considered to be limited as per examples cited below:

- The identified interaction between LVIA and Population and Human Health is considered to be limited as it solely focuses on the advantages associated with the implementation of the landscaping plan.
- No interaction between noise and vibration and the operational phase of the development are identified notwithstanding the fact that these appear to be unresolved in the EIAR and a further detailed study is recommended.

However such interactions are addressed in the main body of the EIAR document and within the accompanying reports. No objection is raised by the planning authority in this regard.

Chapter 16: Summary of Proposed Mitigation Measures

Chapter 16 of the EIAR provides a summary of all relevant mitigation measures for construction and operational phase of the development. These measures should be implemented in the instance that permission is granted for the development.

Planning Assessment

Proposed Development

In brief the proposed development is described within the planning statement as follows:

- Demolition of existing structures on site (3,028 sq.m.) apart from existing protected structures
- Construction of 741 Build to Rent apartment units with ancillary amenity and facilities areas comprising; 30.2% studios (258 units), 35.4% 1 bed units (256 units), 33.87% 2 bed (251 units) and 6 no. 3 bed units in 8 no. blocks ranging in height from 5 storeys to landmark 23 storeys (max. height 79.45 above ground (level) over 7,253 sq.m. basement;
- 10 no. commercial units (3,142 sq.m.) at ground floor level distributed throughout the 8 no. blocks;
- The proposed blocks are connected via public amenity space at ground level and via pedestrianised streets and blocks interconnecting via a semi private "highline" walkway and amenity space. The residential blocks extend over an active street level incorporating retail, café and other community uses.

The proposal consists of blocks B, C and part of block D of the overall masterplan development, with blocks A and E and part of block D to be the subject of later applications for permission for commercial development.

Proposed Layout

Block B in the north western area of the site backs onto the railway, and has three retail units and a community use fronting onto a new street. There are also three entrances to the residential units along the street. Block C is a triangular block on the opposite side of the new street from block B, which has frontage to this street and also to a new east-west street which widens to form a new public space, Connolly Square. Block C has two retail units at street level in addition to block entrances. There are also storage/maintenance uses at ground floor level of block C. Part of block D is included in the application while the southern part, which is the site of the existing building in the south eastern corner of the site, is to be subject to a later application. Three retail units are proposed in block D fronting the new east-west street and one to the south of this, fronting a new north-south street which is shown as linking with Commons Street.

Building Heights

The proposed building heights within the development range from 5 to 23 storeys to include the following:

- Block B- comprises of 3 no. finger blocks which extend up to 15 floors above street level
- Block C – comprises 3 distinct blocks ranging in height from 5 storeys at Block C2 to 23 storeys Block C1
- Block D- comprises 14 floors above Connolly Quarter stepping down in height to 5 storeys towards Oriel Street Lower boundary

Public Realm

The proposal includes a number of new public streets at ground floor level, together with a new public space, referred to as Connolly Square. The proposed new streets connect the site to Sheriff Street and Oriel Street access to the site via the existing vault on Seville Place. A potential future connection to Connolly Station is also indicated in the application documentation.

Masterplan Approach

The application is accompanied by a masterplan which sets out the proposed site development strategy for the entire extent of the site. The application documentation outlines that the proposal comprises of the

residential elements of an intended wider mixed use development proposal for the site which will include office and hotel blocks and will be subject to a separate planning application to Dublin City Council. It is stated that the mixed use proposal is currently at the early stages of the design process but the following is considered for the purposes of the cumulative impact assessment set out within the EIAR:

- Block A – office block c. 23,300 sq.m. – 9 floors of office space over the Protected Structure – Luggage Store Building;
- Block D3 – Hotel c. 9,229 sq.m. – 12 floors;
- Block E- 6,988 sq.m. office building - 8 floors of office accommodation over the Protected Structure Workshop building;

The application documentation outlines that the SHD application includes the infrastructure for the entire site including main pedestrian streets, connections to the adjoining street network, drainage infrastructure and associated services.

The principle of the masterplan approach is supported by the planning authority as it demonstrates how the redevelopment of the site can deliver a mixed use development in accordance with the Z5 zoning objectives pertaining to the site.

CIE Car Parking

At present the application site is used by CIE as a carpark which accommodates c. 390 spaces associated with the operation of Connolly Station. It is stated that under the terms of the development agreement with CIE the applicant is obliged to maintain 180 car parking space for the exclusive use of CIE. The response to ABP pre application consultation opinion outlines that this agreement will be met through the provision of 135 no. car parking spaces within the current SHD application and an additional 45 spaces within the non SHD application. The ABP Opinion Response document outlines that the SHD application does not propose these 135 no. car parking spaces for reasons outlined in a legal opinion attached as Appendix 1 of the report and the plans submitted do not indicate the location of the parking spaces. In this regard the legal agreement refers to the existing and established use of the site as a car park and the obligation of the applicant to maintain a number of car parking spaces for exclusive use of CIE as part of a restrictive covenant on the land which the applicant is bound to and intends to comply with. The document outlines that these spaces will be accommodated in the void above the deck which must be constructed to accommodate proposed residential Blocks B1, B2 and B3.

Having regard to the above, it is noted that the development description does not include reference to the provision of car parking for CIE. This parking is not included within the development description. However, drawing no. 0107 prepared by OCSC Consulting Engineers illustrates an indicative layout of these spaces. Furthermore the legal opinion prepared by Michael O' Donnell refers to the use of these parking spaces as a commercial car park.

The planning authority has serious concerns in relation to the approach adopted within the application in relation to the CIE car parking spaces. The existing use of the site to accommodate CIE parking is noted however such parking is not currently provided at 3rd floor level overhanging the CIE railway sidings. The provision of car parking at this location constitutes development in the opinion of the planning authority and has potential impacts in terms of compatibility with the proposed development which has not been identified within the application documentation to the satisfaction of the planning authority. Furthermore the planning authority would have serious concerns in relation to the undesirable precedent that such a decision would set in terms of the suggestion that compliance with a legal covenant would take precedence over the requirement for planning permission. Serious concerns are raised within the Transportation Planning Report in relation to the proposed access arrangements for the CIE car park as set out within the application documentation. In the instance that planning permission is granted for the development it is recommended that this parking should be omitted.

Proposed Demolition

The proposed development includes the demolition of a number of existing structures on site including 4 no. disused Irish Rail buildings with a gross floor area of c.3,028 sq.m. The Site Demolitions Plan prepared by RKD Architects illustrates the locations of buildings proposed for demolition. It furthermore details that existing telecommunications masts on site are proposed for removal. Existing protected structures on the site are proposed to be retained including the Luggage Building, workshop building and stone walls.

The report received from the Conservation Officer outlines the following in respect of the proposed demolition of Oriel House:

"Whilst I acknowledge that Oriel House is a relatively modest building and has been the subject of unsympathetic internal modifications and the replacement of its original windows, it still retains its form and selected carefully detailed features, has been included in the NIAH and is part of the surviving architectural heritage of this area of the city. I note the significance of the prominent triangular site and its potential as a landmark focus for the proposed hotel within the new overall development. Its loss should be mitigated by its careful recording, and salvage of all sound materials for use within the subject site".

The site is currently an underutilised brownfield site which is strategically located within the inner city and adjacent the major transportation hub at Connolly Station. The planning authority has no objection in principle to the demolition of existing buildings on site to accommodate the proposed mixed use redevelopment of site. Comments raised by the Conservation Officer in relation to reuse of salvaged material can be addressed by means of condition.

Compliance with Policy

- *Proposed Uses – Compliance with Zoning*

The site is zoned objective Z5 – 'to consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity'.

Section 14.8.5 of the plan states that the primary purpose of the Z5 zoning is 'to sustain life within the centre of the city through intensive mixed use development' and 'to provide a dynamic mix of uses, which interact with each other, help create a sense of community and which sustain the vitality of the inner city both by day and night'.

The proposal consists of blocks B, C and part of block D of the overall masterplan development, with blocks A and E and part of block D to be the subject of later applications for permission for commercial development including office and hotel blocks.

Residential use is permissible in principle within the zoning, as is retail use (district, neighbourhood or major comparison) and community use.

The proposed redevelopment of the site for residential use, with active uses at street level, is welcome in principle and is in keeping with the zoning objective, subject to the balance of the site being redeveloped for non-residential uses in accordance with the Masterplan for the site.

The proposed Built to Let scheme comprises a range of studio, 1 bed, 2 bed and 3 bed apartments which would add to the residential supply within the city centre. A case is made for the high proportion of studio and 1 bed apartments within the planning statement submitted in conjunction with the application on the basis of the demographic profile of the area. The principle of a built to let residential scheme is accepted by the planning authority at this location.

- *Plot Ratio and Site Coverage*

The indicative plot ratio for sites with Z5 zoning is between 2.5 and 3.0 while the indicative site coverage is 90%. The planning statement submitted in conjunction with the application outlines that the current SHD proposal provides for a plot ratio of 2.38 and site a coverage of 22.8%. These figures appear exceptionally low having regard to the scale and density of the proposed development and should be clarified. Future proposals for the commercial office and hotel elements as detailed within the masterplan will result in a plot ratio of 3.75. It is noted that, under Section 16.5 of the plan, a higher plot ratio may be permitted in certain circumstances, including adjoining major public transport termini and corridors (where an appropriate mix of residential and commercial is provided), to facilitate comprehensive redevelopment in areas in need of urban renewal, to maintain existing streetscape profiles, to facilitate the strategic role of institutions such as hospitals, or where a site already has the benefit of a higher plot ratio. In this case it is noted that the proposal is for redevelopment of a brownfield site in a city centre location, adjoining a range of public transport options available at Connolly Station (mainline rail, DART and Luas), Busaras (national bus services) and Dublin Bus services along Amiens Street. The plot ratio is deemed to be acceptable and in accordance with development plan policy in this regard.

While it is noted that the site coverage for the development will fall below Development Plan guidance this is justified on the basis of the need to provide entrances, public open space and connectivity through the site which is supported by the planning authority.

- *Density*

The proposal provides for a residential density of 257 dwellings per hectare. This has increased from 248 at opinion stage. The site also includes non-residential uses. While the proposed density is relatively high, having regard to the city centre location and strategic location adjacent to a public transport hub, it can be considered subject to good design and to residential amenity considerations. Overall design and residential amenity considerations are addressed in later sections of this report.

- *Residential Support Facilities, Residential Services and Amenities, Private Amenity Space, Communal Amenity Space and Public Open Space*

The applicant has submitted a statement of consistency, schedule of accommodation and a housing quality audit in addition to the submitted drawings to assist with an assessment of the proposal against the Sustainable Urban Housing: Design Standards for New Apartments 2018. The submitted documents state that the apartment sizes and layout etc. complies with the relevant standards. Having reviewed the floor plans and submitted 'apartment types' drawings, this is accepted.

Residential Mix

The proposed Build to Rent development comprises the following mix of units: 30.2% studios (258 units), 35.4% 1 bed units (256 units), 33.87% 2 bed (251 units) and 6 no. 3 bed units. Concerns are raised within a number of submissions on the application and at the presentation to the Central Area Committee in relation to the high proportion of studio and 1 bed units within the scheme. These concerns are shared by the planning department and it is recommended that the unit mix should be further revised to provide a maximum of 60% studio and 1 bed units and a minimum of 40% 2 and 3 bed units within the scheme in order to promote the optimal supply of apartments for a range of needs and aspirations and the need to create long term sustainable communities.

A justification for the proportion of studio and one bed apartment within the development is provided on the basis of the demographics of the receiving environment. Chapter 4 of the EIAR includes a demographic assessment of the baseline environment of the surrounding area having regard to the information contained within the 2006, 2011 and 2016 Census for the North Dock B and North Dock C ED's. Table 4.4 identifies that a high proportion of the population are within the 20-40 age group (62.5%) and 67.7% of residents within the area are classified as single within the 2016 Census and a justification for the proposed mix of units within the scheme is provided in this regard.

Residential Amenities

The proposed development includes the provision of residential support amenities including 1 no. gym, a resident's lounge, work areas, meeting rooms, dining rooms, and recreational areas with a combined GFA of 1,444sq.m. Final details of the use of these amenities should be subject to agreement with the planning authority.

Part V

The requirements for Part V apply to build to rent development. A total of 75 units are proposed within block C3 of the proposal including 36 no. studio apartments, 16 no. 1 bed units and 23 no. 3 bed units. The correspondence on file from the Housing Department outlines that the applicant has engaged Dublin City Council in relation to compliance with Part V and requirements for compliance with same.

Other supporting reports

A Childcare Assessment is submitted in conjunction with the application. This outlines that 15 no. existing childcare facilities are located within proximity to the application site and additional crèche facilities have been granted planning permission in the vicinity of the site. The application furthermore makes reference to the unit typology of the scheme and based on a worst case scenario outlines that 38 no. preschool children would be accommodated within the development. The planning authority has no objection to the non-provision of crèche facilities as part of the development in this regard.

In addition to the above a social infrastructure audit and residential needs assessment is included with the statement of consistency. Details of management and operation of the residential scheme are addressed within the report from Greystar attached as Appendix 3 of the Statement of Consistency.

On review of the application documentation it is noted that an Adaptability study for the proposal has not been submitted. This should be addressed via condition in the instance that planning permission is granted for the development.

- Public and Private Open Space

Private amenity space standards are set out in *Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities*, Department of Housing, Planning and Local Government March 2018. In relation to communal and private amenity space, the applicant has availed of the flexibility set out in SPPR8 (ii) to provide the majority of open space as semi-private, communal open space. This is acceptable in principle given the policy set out in the apartment guidelines.

The statement of consistency states that the minimum standards have been exceeded (8,006sq.m required and 10,253sq.m proposed) however it is noted that the calculations appear to include areas that are not in themselves amenity spaces e.g. corridors in the highline. However, the quantum of communal open space is accepted by the planning authority. The quality of the proposed communal open space is considered in further sections of this report.

Section 16.10.3 of the Dublin City Development Plan 2016-2022 also states that 10% of the site area should be reserved for public open space (i.e. amenity space which is publicly accessible and contributes to the city's network of public spaces). Public open space is proposed in the form of a new square located roughly in the middle of the overall site with linked pedestrian streets and providing for future permeability through the site.

From review of the application documentation it is not clear if 10% public open space has been provided. On the basis of the site area a total of 2,880 sq.m. public open space would be required. Compliance with the 10% requirement is not addressed within the application documents. The public notices refer to the provision of 2,000 sq.m. public plaza and it is considered that there may be a shortfall in provision. The applicant was requested at opinion stage to ensure that the proposal complies with the 10% requirement and such evidence has not been submitted. The quality of the proposed open space is considered later in this assessment.

- Building Height

The proposed building heights within the development range from 5 to 23 storeys to include the following:

- Block B- comprises of 3 no. finger blocks which extend up to 15 floors above street level
- Block C – comprises 3 distinct blocks ranging in height from 5 to 23 storeys
- Block D- 14 floors above Connolly Quarter stepping down in height towards Oriel Street Lower boundary

The architectural design statement sets out a building height strategy for the proposed development having regard to the following considerations:

- Provision of Stepped Heights and Volumes -stepped approach to building heights and massing down to the perimeter streets
- Design layout and separation distances seek to optimise daylight/sunlight to the proposal
- Hierarchy of volumes and heights is determined via the impact on surrounding boundaries and open spaces within the scheme
- Block B heights are maximised to offer maximum residential units. Block B comprises 3 no. residential buildings which step down in height towards Connolly Station boundary. The blocks are elevated above the Connolly Station sidings and offer view of the city.
- Block C1 is the tallest given that it is removed from site boundaries
- Block C2 steps down in height towards boundaries with Oriel Street and Oriel Hall
- Block C3 steps down towards the site boundary
- Block D2 steps down through 3 distinct blocks to Oriel Street

Development Plan Guidance

Section 16.7.2 of the Dublin City Development Plan states that planning applications will be assessed against the building heights and development plan principles established in the relevant LAP/SDZ/SDRA. It is stated that proposals for high buildings should be in accordance with the provisions for the relevant LAP/SDZ/SDRA in addition to the assessment criteria for high buildings and development plan standards. Connolly is identified as a high rise area, within the Dublin City Development Plan, where building heights of 50m-plus are permissible in principle.

The Development Plan outlines that all proposals for mid-rise and taller buildings must have regard to the following assessment criteria:

- Relationship to context, including topography, built form and skyline, having regard to the need to protect important views, landmarks, prospects and vistas.
- Effect on the historic environment at a city-wide and local level.
- Relationship to transport infrastructure, particularly public transport.
- Architectural elegance of a building which is of slender proportions, with a slenderness ratio of 3:1 or more to be aimed for.
- Contribution to public spaces and facilities.
- Effect on the local environment, including microclimate and general amenity considerations.
- Contribution to permeability and legibility of the site and the wider area.
- Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, 360-degree view analysis, shadow analysis, wind analysis etc.
- Best practice guidance related to sustainable design and construction of tall buildings.
- Evaluation of how to provide a similar density in an alternative urban form.

The ÁBP Opinion response document outlines how the proposed development responds to the above criteria. In particular it is stated that Block C1 complies with the slenderness ratio identified within the Development Plan. In many instances it is noted that the criteria set out above are identified within the building height guidelines, apart from the reference to a specific slenderness ratio. In order to avoid duplication of information the proposal is assessed in line with the criteria identified in SPPR3 below.

SPPR3 of the guidelines states that, where an application for permission sets out how a development proposal complies with the above criteria and the assessment of the planning authority concurs with the findings, taking into account the wider strategic and national policy parameters, the planning authority may approve such development even where specific objectives of the development plan or a local area plan indicate otherwise.

The Statement of Consistency addressed the building height criteria set out within the Building Height Guidelines. The proposal may be assessed in the context of the relevant criteria as set out the Guidelines as follows:

At the scale of the relevant city or town

- *Site to be well serviced by public transport with high capacity, frequent service and good links between modes.*

The application site is strategically located adjacent to a major public transportation interchange at Connolly Station within the north inner city. The site is currently an underutilised brownfield site and its redevelopment for high density mixed use development is supported in principle and welcomed by the planning authority.

- *Proposed development should integrate into and enhance the character and public realm of the area, including areas which are architecturally sensitive, having regard to topography, cultural context, setting of key landmarks, protection of key views etc, to include a landscape and visual assessment.*

A Landscape and Visual Impact Assessment is set out within Chapter 5 of the EIAR. This is accompanied by a series of photomontages. Post development the impact of the proposal is envisaged to range from not significant to very significant/positive. The scope of the LVIA considers the landscape and visual impact of the proposal on long range visibility of the development from key vistas and impacts of the proposal on the surrounding streetscape.

Mid and Long Distance views

The LVIA makes a case that in the mid distant and long distant views the development would be visible but would cause low to medium magnitude of change. On review of the photomontages it is considered that the proposal will have no impact on the character or the setting of the majority of ACA's as identified within the City Development Plan.

The LVIA makes a case that rather than dominating city wide mid distant and long distant views the proposal would add visual interest making a positive intervention to the skyline and indicating a place of significance improving legibility. A case is made that the graduation in height from outer edges towards a landmark building together with variations in form design and materials would cause the development to read as an urban quarter of distinct identity.

As illustrated in View 7 the proposal will not be visible from the Custom House. Views 4 North Earl Street presents a view from the O' Connell Street ACA and View 5 Talbot Street illustrates a view from the Georgian Conservation Area at Gardiner Street/Talbot Street.

The LVIA and photomontages have been reviewed by the Planning Department and also the City Architects Department and Conservation Officer. The following commentary on these views is provided within the City Architects Report:

Connolly Station - Views 4 and 5, Talbot Street & North Earl Street.

These views look long in eastward direction from Talbot Street and North Earl Street and offer a view along the four-storey commercial and residential street buildings framing the view of the tower of Connolly station, which is a protected structure. The prominence of the station tower as a destination at the end; becomes diminished with the intensity of the proposed development dominating the skyline behind.

The slenderness ratio view of the Tower from this angle is approximately 2 to 1, which is acceptable however the Block B also poses a significant negative impact on the skyline at this point. There is little attempt to provide any articulation of the façade here, which is poorly designed.

The future proposed office building in the masterplan document further negative impacts on the skyline in this view, but it will be subject to a future planning application.

The Conservation Officers report furthermore outlines the following in respect of these views:

"The impact on the skyline is illustrated particularly in Views 04 and 05 where the campanile of Connolly Station is no longer the prominent feature at the end of the vista along Talbot Street, but stands against the backdrop of the new buildings".

On an overall basis, at a city wide scale it is considered that the proposed development would not have a detrimental impact on the character and setting of key landmarks and views.

The comments by the City Architects and Conservation Officer in relation to views 4 and 5 are noted but it is considered that on balance the prominence of Connolly Station Tower would be altered by any future development on the site which would incorporate high density and height as prescribed within the City Development Plan. Similar comments also relate to view of St. Laurence O' Toole Church as illustrated on View 9.

The visual impact of the proposal on the adjoining streetscape is considered under the criteria for tall buildings at the scale of the district neighbourhood and street.

- *On larger urban redevelopment sites, proposed development should make a positive contribution to placemaking, incorporating new streets and public spaces, using massing and height to achieve the required density but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.*

At present, the site is occupied by car parking, railway related uses and structures and contributes little to the character of the area and represents an underutilisation of a strategically located brownfield site. Limited connectivity is provided with the surrounding streetscape. The proposed development includes the creation of new streets and access points through the site connecting to the surrounding area thereby

resulting in a significant improvement of pedestrian permeability. In principle it is considered that the proposal, in providing for permeability and new public spaces surrounded by the proposed new blocks has the potential to deliver a positive contribution to placemaking in the area. The density of the proposal while high can be considered in principle given the location of the site on a public transport interchanges. The provision of a landmark building at this location is in accordance with Development Plan policy which identifies potential for a landmark building at Connolly Station. The proposal provides for variety in terms of block design and elevational treatment, with the proposed blocks providing a varied palette of materials.

At the scale of the district/neighbourhood and street

- *Proposal should respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.*

The application site is located to the south of Seville Place and southwest of existing two-storey houses at Oriel Hall off Oriel Street Upper. The site is bounded to the east by Oriel Street Upper, which has a mix of two and three-storey houses and apartment buildings on the opposite side, and by Sheriff Street Lower to the south.

The LVIA assessment refers to the existing character and building typology surrounding the site which includes low density residential areas to the north and east. The assessment refers to the potential of the juxtaposition of a high density development with a cluster of tall buildings and landmark tower within the existing streetscape to be stark and impacts on adjacent and surrounding streets including Sheriff Street Upper, Oriel Street Upper, Seville Place, Coburg Street and Common Street would be of high or very high magnitude. The impacts on these surrounding areas are identified within Views 21 to 27. In this regard it is considered that the proposal would read as the dominant elements of the views.

These photomontages have been reviewed by the Planning Department and the City Architects Department, the magnitude of the impact of the views is categorised as either, low, medium or high and detailed commentary has been provided where impacts are identified. The following provides a summary of the commentary on impacts which are identified within the City Architects report as medium or high:

View 22 Coburg Place – High Impact

This view lines almost perfectly with the proposed axis formed between the C and B blocks; and as such affords a perpendicular perspective with the northern-eastern elevations of blocks C1, C2 & B3. In juxtaposition to the existing low level residences on the street; the development dominates the sky to the southwest. The B-blocks and the D blocks exhibit their sheer elevational mass from this viewpoint; to which there is little relief. These elevations are devoid of significant character and are of a poor design aesthetic.

The slenderness ratio of the C1 tower works quite well from this perspective; however the massing of the C3 block is at the maximum of what could be conceived as a tolerable limit.

View 24 Seville Place Approaching Oriel Street Junction- High Impact

This view is one that is an off-axis perspective of the proposed development; and captures the assemblage of building scales and elevation treatments that appear quite random and under-considered. The buildings blocks are stepped down from the tower block C1; towards the viewer location; however it is apparent that there has been little attempt to scale down the B3 block in height towards Seville Place at four stories higher than the C3 block.

To the left corner of the view the intense scale of the proposed D2 block further emphasises the disproportionality with existing on Oriel Street.

View 25 Oriel Street Upper- High Impact

This view is of the proposed shared pedestrian and vehicular entrance off Oriel Street looking southwest. The five-storey scale of the D2 block in comparison to the existing two-storey illustrates little consideration to the immediate context.

This will be even more apparent, should the future proposed hotel building as indicated in the masterplan document be approved as suggested in the masterplan document submitted as supporting documentation with this SHD application.

View 26 Commons Street- High Impact

The proposed twenty-three storey tower block C1 in its southwest to northeast orientation displays the full southern elevation and angled south-eastern elevation.

This presents a significant and bulky mass along this view; to which a more slender profile would be preferable. From this viewpoint there is little clue as to the proposed square of which is to be the central place-making element of the public domain. The scheme concept relies only on the towering white building as a marked to assist in locating where the 'place' lies. The proposed block D presents a fifteen storey southern red-brick elevation of which detracts somewhat from the tower and has a rather bland poorly designed appearance without any significant character.

View 27 Sheriff Street Upper – High Impact

This photomontage view is of the external arches to the Luggage Store vaults over to junction of Sheriff Street Lower and Common Street; which is to be the main southern presentation to the site. The view captures Block B1, the C1 tower block, C2 block and the D blocks in perspective.

Whilst not all in frame; the high mass and scale of the B block become apparent without relief. At this angled view, the slenderness of the C1 block seems relatively proportionate to its height. In the distance, the D1 block appears quite large in context with the residential street in the background.

On review of the photomontages and the comments on the SHD application by the City Architects Department it is important to consider the significance and sensitivities of the receiving environment. At a city wide scale it is considered that the proposed development would integrate into and enhance the character and public realm of the area and would not have a detrimental impact on the character and setting of key landmarks and views.

The LVIA acknowledges that the streetscapes of Sheriff Street Lower and Oriel Street Upper would be substantially altered as a result of the redevelopment of the site but on balance it is noted that this could be said of any redevelopment of the site.

The proposal includes the creation of increased permeability through the site and physical changes to the street edge. The character of the area would be significantly altered as a result of the proposed development through the introduction of a cluster of high rise buildings including a landmark building within the site and changes to the urban grain and movement patterns.

In its assessment of the impact of the proposal on the existing adjoining streetscape the LVIA refers to the objective of the Development Plan to provide for high rise development within the Connolly Station area and the design approach of staggered height at the site boundaries to minimise impact on adjoining areas. Planning gain through the introduction of access and permeability through the site is furthermore identified.

The Statement of Consistency furthermore refers to the benefits associated within increased permeability to the site as follows:

"While diverting from the surrounding areas, the development would fill a large gap in the existing townscape reducing the disconnect between the surrounding areas and establishing a new urban quarter with a distinct identity. In doing so it would enhance all of the surrounding areas, either by direct improvements (eg Sheriff Street Lower, Oriel Street Upper) or indirectly through changes to views (introducing a new and attractive built element to the view compositions, indicating a new place of significance in the townscape)".

In addition to the above the planning authority considers the potential of the site to deliver upon Development Plan policy objectives of integration of land use and transportation objectives. While the opinion of the City Architects Department are generally shared by the Planning Department in some instances it is considered that the comments raised within the report by the City Architects relating to the visual impact of the proposal on the surrounding area could be addressed by means of revisions to façade treatment, materials and potential redesign.

Concerns in relation to the visual impact of the proposed B Blocks are identified within the City Architects report as follows:

"The bulk massing of the development has impacts on the quality of residential amenity, the public realm and the skyline. The B complex, in particular the intense massing and repetitive form in tight proximity of the each other, poses a significant problem in relation to the impact on the quality of external amenity spaces".

On foot of the above concerns the omission of Block B2 is recommended. A condition to this effect and consideration of same could be given in the instance that planning permission is granted for the development.

- *Proposal should not be monolithic, should avoid long uninterrupted walls of building and should have materials and building fabric which are well considered.*

The architectural design statement outlines that the proposal seeks to create a "collection of building forms with individual identities. The architectural treatment and detailing of the proposed development have been designed to reflect the industrial character, heritage and railway architecture. It is stated that the use of brick as the predominant façade material alongside a feature white metallic panel system ensures low maintenance and durable solution.

- Brick is proposed as the primary façade material for Block B with separate colours introduced and metal spandrel detail and metal balconies are proposed to create a fine grain modulation. At street level a grey brick colonnade is proposed which supports the highline and contains a predominately glazed retail/café façade above this level a glazed brick façade is provided for the amenity spaces. At upper levels a modular brick façade arrangement is proposed. B1 comprises light grey brickwork facing Connolly Square on southern elevation and buff brickwork on NE elevation. B2 accommodates red brickwork and B3 façade is composed of beige colour brickwork.
- C1 comprises the landmark building of the site at 23 storeys (79m). The façade of Block C1 is broken down into 3 no. distinct vertical sections (base-middle-top) to fragment the mass and height. The façade comprises modules offering inclined white metallic surfaces and varying window size openings.
- Blocks C2 and C3 comprise of a façade of buff, red and grey brickwork.
- Block D1 comprises of a dual façade approach with a white façade facing Connolly Square and red brick warehouse architecture facing the internal street. The southern façade of this block comprises a green wall treatment. The façade treatment for the block furthermore comprises of brown, grey and light red brickwork;
- The design statement outlines that industrial material references are embedded within the highline.

On an overall basis, the elevational treatment and palette of materials proposed for individual blocks differ therefore having the potential to add variety and interest to the streetscape. All materials will need to be of a high quality, durable and reflective of the character of the area and the industrial/railway heritage of the site.

The following detailed comments have been made by the City Architects in relation to the elevational treatment of the proposed buildings:

"The design principle of articulating three distinct vertical sections (base-middle-top), which was applied to Block C1, has not been applied to the other tall buildings, i.e. Blocks B1, B2, B3 and D1. This results in a relatively monotonous and repetitive flatness to the latter elevations, with no distinct punctuation at the top of buildings; and reinforces the sense of the buildings being over-scaled relative to the wider environment".

As earlier detailed the removal of Block B2 is recommended within the City Architects report. Points are also raised within the City Architects report in relation to clarification of materials of Block C1 and submission of a maintenance strategy. Such points could be appropriately addressed by means of condition as summarised below.

In the instance that planning permission is granted for the development it is considered that details of the materials, colours and textures of all the external finishes to the proposed development should be agreed

in writing by the Planning Authority. A panel of all the proposed finishes should to be placed on site to enable the planning authority adjudicate on the proposals. Construction materials and detailing shall adhere to the principles of sustainability and energy efficiency and high maintenance detailing shall be avoided. Prior to the commencement of development the developer shall submit a maintenance strategy for materials within the proposal for written agreement of the planning authority.

- *Proposal should enhance the urban design context for public spaces and key thoroughfares and inland waterway/marine frontages, thus enabling additional height to be favourably considered in terms of enhancing a sense of scale and enclosure, while being in line with requirements in relation to flood risk management.*

Advantages associated with increasing permeability and connections through the site together with the provision of public open space in an area which is currently deficient in such provision is noted. However the quality of the proposed public spaces is questioned in terms of its microclimate and access to sunlight and daylight. There are information deficiencies within the application documentation in this regard as later detailed in this report. A site specific flood risk assessment is submitted in conjunction with application. This has been reviewed by the Drainage division and no objections have been raised.

- *Proposal to make a positive contribution in the form of legibility through the site or wider urban area, and integrate in a cohesive manner.*

The proposed development provides connectivity through the site and linkages to the wider street network. New connections are being made at Sheriff Street Lower, Oriel Street Upper, Common Street and Seville Place. The proposal has the potential to make a positive impact to the streetscape of the area through the provision of linkages and permeability through the site and quality public open. This approach is welcomed by the planning authority.

- *Proposal to contribute to mix of uses and/or building and dwelling typologies in the area.*

The proposed Built to Rent scheme comprises a range of studio, 1 bed, 2 bed and 3 bed apartments which would add to the residential supply within the city centre. The proposed Built to Rent development comprises the following mix of units: 30.2% studios (258 units), 35.4% 1 bed units (256 units), 33.87% 2 bed (251 units) and 6 no. 3 bed units. A case is made for the high proportion of studio and 1 bed apartments within the planning statement submitted in conjunction with the application on the basis of the demographic profile of the area. The principle of a built to rent residential scheme is accepted by the planning authority at this location. Concerns are raised within a number of submissions on the application and at the presentation to the Central Area Committee in relation to the high proportion of studio and 1 bed units within the scheme. These concerns are shared by the planning department and it is recommended that the unit mix should be further revised to provide a maximum of 60% of studio and 1 bed units and a minimum of 40% 2 and 3 bed units within the scheme in order to promote the optimal supply of apartments for a range of needs and aspirations and the need to create long term sustainable communities.

At the scale of the site and building

- *Form, massing and height to be carefully modulated to maximise access to natural light and ventilation and minimise overshadowing and loss of light*
- *Appropriate and reasonable regard to daylight standards such as the BRE 2008 standards*
- *Where a proposal does not fully meet all of the daylight provisions compensatory design solutions should be set out, having regard to local factors and site constraints.*

A Sunlight and Daylight Access Analysis prepared by IES has been submitted in conjunction with the application. A case is made within the application documentation that the proposed development has been designed to ensure minimal impact on daylight or sunlight quality for adjoining lands. In this regard the report outlines the following:

- 98% of tested rooms in the proposed scheme are projected to have an ADF above BRE recommendations.
- Of the 15 amenity areas assessed 12 surpass the BRE recommendation.
- In terms of impact on the adjoining streetscape the proposal is envisaged to have an almost identical impact to that permitted under the previously approved scheme.

The Planning Authority acknowledges that the above results suggest that overall the proposed scheme achieves a high level of compliance with the BRE Guidelines for Sunlight, Daylight and Overshadowing.

It is noted that the issue of sunlight and daylight was the subject of prolonged discussion at the pre-application consultation process with the Planning Authority and An Bord Pleanála Opinion stage. At opinion stage the planning authority detailed specific additional information to be provided within the final Sunlight and Daylight Assessment.

The study outlines that the following revisions have been made to the scheme to address comments raised at opinion stage:

- Removal of overhanging balconies that impacted on daylight to living rooms
- Increased glazing to full extent at lower levels to increase daylight penetration
- Greater distances are provided between buildings to maximise exposure to daylight
- No north facing apartments are proposed
- BRE have advised on suitable VSC for the site

Notwithstanding the above revisions and on review of the submitted Sunlight and Daylight Assessment it is noted that the following requirements of the planning authority have not been addressed and therefore remain unresolved:

- Diagrams indicating levels of light penetration to all habitable rooms at the lower levels in Blocks B1, 2 and 3 and C1, 2 and 3 to illustrate the actual extent of light penetration into rooms/units at these levels. The information provided within the Sunlight and Daylight Assessment relates to Floors 4 upwards.
- The assessment does not provide a sunlight/daylight analysis for the proposed public open space at ground level including the main public plaza at Connolly Square located to the south of Block C1. The shadow analysis presented in Section 5 of the report illustrates the proposed public open space in shadow in the majority of instances.
- An average daylight and sunlight analysis of the combined amenity areas is applied by the applicant to satisfy the minimum threshold of 2 hours sunlight on the 21st of March. It is considered that these figures rely heavily on the roof terraces.

The planning authority has concern that the height, design and layout of the proposal impacts on the quality of the proposed open spaces and the quality of the proposed residential units and such concerns would require further design consideration and revision. Such concerns are reflected within the reports prepared on the application by the City Architects Department and the Parks and Landscaping Department as detailed within the extracts below:

"The bulk massing of the development has impacts on the quality of residential amenity, the public realm and the skyline. The B complex, in particular the intense massing and repetitive form in tight proximity of the each other, poses a significant problem in relation to the impact on the quality of external amenity spaces. Poor results in daylighting are presented in the Daylight, Sunlight and Overshadowing Performance Report. Of the select average daylight factor analysis presented, the internal daylight quality of the apartments present particularly concerning low levels in Block B1, B2, B3, C2 and D1.

Communal Amenity Areas

The quality of the shared amenity is particularly important in this development given the majority of the apartments have no private amenity space. However, there are apparent design issues in some of the semi-public amenity spaces as revealed by the applicant in The Environmental Reports submitted.

With regard to daylighting, the 'Daylight, Sunlight and Overshadowing Performance Report' (pg 72) states: "Three of the fifteen areas would not receive the recommended amount of sunlight due to their positions between blocks". The daylighting quality of the podium courtyard of Block B present concerning results, with B2 and B3 courtyards not meeting the minimum threshold for daylighting.

With regard to pedestrian comfort, the 'Pedestrian Comfort Analysis Report' states that poor wind conditions will be experienced: "The primary reason is the orientation of these podium spaces, which makes them susceptible to wind tunnelling from both the westerly and southerly winds. These are

dominant wind directions in Dublin." It is apparent the courtyards of Block B will be often dark, damp and potentially prone to prevailing winds.

An averaged daylight and sunlight analysis of the combined amenity areas is applied by the applicant to satisfy a minimum threshold of achieving 2 hours of sunlight on the 21st March. It also relies heavily on high-level roof terraces exposed to higher levels of daylight to achieve the averaged result. However, despite this and according to the submission, 32% of the areas do not achieve this minimum standard of daylight.

The Planning Authority has concerns regarding the quality of the amenity spaces. This matter is of concern not just because of the inadequate quality of the individual amenity spaces but critically because of the direct impacts on the residential quality of the adjoining apartments at lower levels. In this respect, it is anticipated that the residential amenities of these small, predominantly single aspect units will be seriously compromised by the lack of direct sunlight available to the communal open space and hence to the adjoining apartments.

While it is acknowledged that mitigation measures have been introduced to maximise direct light to the units, sufficient evidence has not been submitted to demonstrate that these units will enjoy good levels of both daylight and sunlight.

Having regard to the above reasons and considerations the planning authority considers the insufficient information has been provided within the final application to undertake a full review of the quality of the proposed residential units at lower level and open space provision in terms of access to daylight and sunlight. In this regard it is noted that specific concerns raised at opinion stage have not been addressed to the satisfaction of the planning authority.

Notwithstanding the above, if the Board is minded to grant permission for the proposed development it is recommended that consideration is given to the removal of Block B2 above podium level.

Impact on Surrounding Areas

The assessment furthermore considers impacts on adjoining residential properties at Oriel Hall and Oriel Street Upper. In terms of shadow analysis on the adjoining area it is stated that the impact of the proposal is almost identical in terms of impact to that previously permitted under Register Reference 2863/11.

The assessment identifies the following impact on adjoining properties

- Oriel Hall: Windows at Oriel Hall currently have few obstructions. With the proposed development they would fall below the recommended VSC target of 27%. However it is stated that the consented development would also have a significant impact in terms of access to daylight. Table 2 indicates that of the 28 windows assessed 14 would receive more daylight in the SHD proposal. Of the remaining 14 windows, the changes in 4 of these are stated as being negligible but the remaining 10 would be significantly lower than the consented development.
- 1-7 Oriel Street Upper- 24 windows assessed – loss of daylight to 12 would be within BRE guidelines and of the 12 remaining windows 11 of these would retain more VSC than they would have under the consented scheme. Loss of VSC to the final assessed window would almost be within BRE guidelines at .77 times its current value. It is stated that when taken as a whole the proposal would have less impact than the consented scheme on these properties.
- 8-10 Oriel Street – while it is stated that the proposed development would have a major impact on VSC available to windows at these properties in all instances it is stated that less of an impact is observed than the consented scheme.
- St. Laurence O Toole Court House Complex – major loss in VSC is noted at this location. It is stated that the consented development would also have a major loss in VSC but the losses are smaller in some instances. In this regard Table 8 illustrates that 19 windows would be less affected but 12 windows would be more affected – substantially in some instances.

On the basis of the above the following conclusion is included in the study:

"The neighbouring properties at Oriel Hall and Oriel Street Upper are currently almost completely unobstructed and have high existing VSC's. The development would have a moderate or major adverse impact on most of them. However, the consented development would also have a moderate to major adverse impact. When comparing the impacts of the proposed and consented developments, some

windows would be less affected and some windows would be more affected, such that there is no clear improvement or dis-improvement when all the neighbouring properties are considered together”.

On review of the above, it is noted that the principle of the redevelopment of the site for high density mixed use development is welcomed by the planning authority and in accordance the Z5 zoning objectives pertaining to the site and the policies and objectives of the City Development Plan which support the integration of land use and transportation. The planning authority accepts the case made within the application that the proposed development on an overall basis will have a similar impact on adjoining site boundaries to the previous development permitted on the site. It is noted that the height of the blocks at site boundaries have been increased from 4 storeys at opinion stage to 5 storeys within the final application. However there is no increase in impact identified as a result of this increase.

Specific Assessments

In some of these cases specific assessments may also be required, to include:

- *Assessment of micro-climatic impacts such as downdraft, to include mitigation measures and an assessment of the cumulative impacts where buildings are clustered;*

A pedestrian comfort report is submitted in conjunction with the application. With regard to pedestrian comfort, the ‘Pedestrian Comfort Analysis Report’ states that poor wind conditions will be experienced within the proposed podium spaces “The primary reason is the orientation of these podium spaces, which makes them susceptible to wind tunnelling from both the westerly and southerly winds. These are dominant wind directions in Dublin.” It is apparent the courtyards of Block B will be often dark and potentially prone to prevailing winds.

- *Impact on sensitive bird or bat areas;*

These points are addressed within the Biodiversity section of the EIAR and the report received from the Biodiversity Officer in Dublin City Council.

- *Assessment of whether the proposal allows for retention of important telecommunications channels and maintains safe air navigation;*

Impact on telecommunications is addressed within the Built Services Chapter of the EIAR.

The submission from IAA is noted in relation to issues raised on safe air navigation. This outlines that the principle of the proposed 23 storey landmark building at this location should be agreed in terms of potential impacts on flight paths. Mitigation measures are also identified. Having reviewed the content of this submission, the planning authority is not aware if the principle of the proposed 23 storey landmark building has been agreed with IAA.

- *An urban design statement, to include the impact on the historic built environment, where appropriate.*

An architectural design statement is provided in conjunction with the application which sets out a rationale for the layout, design and materials of the proposal. This is cross referenced throughout this document where relevant.

- *Relevant environmental assessment (EIA, AA etc).*

An EIAR AA Screening Assessment are submitted in conjunction with the application. The contents of these documents are addressed earlier in this report.

Conclusion – Compliance with SPPR3

The proposed development has been considered and assessed in light of the guidance set out within the Building Height Guidelines above and while it is evident that the principle of the development of high buildings including a landmark building is supported by the planning authority in policy terms at this location there is concern whether the development as currently proposed would comply with the assessment criteria at the scale of the site and building. In particular the planning authority has concern in relation to information deficiencies within the submitted Sunlight and Daylight assessment in terms of the quality of the proposed open space and residential units at lower levels. This information was requested

by the planning authority at pre application stage and ABP opinion stage and the concerns raised in relation to the content and scope of the Sunlight and Daylight Assessment have not been addressed within the final application documentation and in normal instances this would be subject to a request for further information. In this regard the planning authority is of the opinion that design changes would be required to the scheme to demonstrate compliance with BRE standards.

Furthermore, having regard to the content of the submission from the Irish Aviation Authority, it is not clear to the planning authority if there are outstanding issues in relation to the proposed 23 storey landmark building. Other concerns raised within the above assessment could be addressed by means of conditions.

Layout of Proposed Apartment Blocks

In relation to the proposed apartment layouts overall, a number of observations are made as follows:

- Refuse area serving Block D appears undersized and difficult to access from Block D1.
- There is concern regarding the level of potential noise and disruption for occupants of the 3 no. apartments proposed in Block C3 and Level 1 adjacent to the gym, spin class etc.
- Balcony access is generally unclear
- The proposed communal roof terrace in Block C1 Level 21 appears to be a large private balcony.
- The internal layout of the proposed 01 studios in Block C2 (Level 2-10) could be revised to avoid cooking next to the bed.
- Green roof access in Block D2 Level 1 should be clarified.
- The floor plans indicate doors from corridors/landing areas into open air and should be clarified.
- 'Residential amenity' rooms within the buildings need to be defined within the plans
- Anomalies in terms of layout illustrates within drawings RKD -XX-00-DR-A-1004, A1005, A1006 and Drawings RKD -00-00-DR-A-1004, A1005, A1006. Final layouts should be agreed with the planning authority.
- Revisions to the plant and lift/ stair overruns at roof level of the proposed blocks to reduce their visual impact.

The above points could be addressed by means of condition requesting revised drawings in the instance that planning permission is granted for the proposed development.

Proposed Ground Floor Uses

The ground floor layout seeks to maximise activity along the proposed new streets and public open spaces to encourage footfall through the site. The design statement outlines that a range of retail, leisure, café, commercial uses are envisaged to meet the needs of the proposed residents of the scheme and serve the local area. In addition to the proposed retail commercial uses, all entrances to the residential blocks are located at street level. The provision of active ground floor uses is supported by the planning authority.

The development includes the relocation of the existing GAA club and local boxing club from the existing vault on Seville Place to Block B. The relocation of this existing use is proposed to facilitate enhanced permeability of the site through the creation of a connection to the site from Seville Place. The creation of a pedestrian link to Seville Place is supported by the planning authority. However as detailed within the City Architects report the proposed lighting scheme for the site should be extended to include this area and details of security/management of this access should be submitted for written agreement of the planning authority. Signage proposals for the proposed ground floor units should be subject to a separate application to the planning authority.

The proposed retail unit at Block D includes a large plant area at ground floor level as detailed in Drawing Block D – Plan Level 00. Revised proposals to provide a more appropriate frontage should be provided in this regard. Further opportunities for the creation of active frontage to Oriel Street would also be supported by the planning authority. These points could be addressed by means of condition in the instance that planning permission is granted for the development.

Public Realm, Public and Private Open Space

The proposal includes a number of new public streets at ground floor level, together with a new public space, referred to as Connolly Square. The proposed new streets connect the site to Sheriff Street and

Oriel Street, while it is stated that it is intended to connect to Seville Place and Connolly Station in the future.

- Public open space is proposed in the form of a new square located roughly in the middle of the overall site with linked pedestrian streets and providing for future permeability through the site.
- Communal Open space is proposed in the form of a “highline” – an outdoor pedestrian walkway with break out spaces connecting each of the blocks at first floor level and designed to connect internal residential amenity spaces located within Blocks B, C and D.
- Three podium courtyards (described as semi private open space) to be provided at 4th floor level located between/to the southwest of Blocks B1, B2 and B3
- Roof top gardens/terraces (described by the applicants as private open space) located at roof top level of each block and private to each block
- Private amenity provided by balconies 165 sq.m.

The private and public open space provision is detailed within the landscaping drawings submitted in conjunction with the application. In relation to the quality of the communal amenity space, it is considered that the high level walkway is an innovative and interesting method of maximising the use of the internal residential services and amenities and should engender a sense of neighbourhood and community. The mix of residential services and amenities is also considered satisfactory.

The quality and usability of the podium courtyards serving block B has been raised by the Planning Authority during pre -application discussions and the climatic conditions at roof level will also be a significant factor in the final design of the roof top terraces. The quality of the proposed public open space in terms of access to sunlight and daylight and climatic conditions has also been raised by the planning authority.

The proposed open space provision has been subject to review by the Parks and Landscape Services Division has outlined the following:

“The application’s landscape submission proposals provide for open space for both future residents and the local community at three levels, an open publically accessible ground level resource, an elevated communal high-line provision and private roof gardens. The ground plane landscape architecture concept is based on evolution and well developed proposals are presented. The elevated highline provides a connected recreational communal open space for residents and the roof provision include a dual provision of proposed brown roofs for biodiversity and accessible roofs for residents. Temporary landscape planting is provided on two sites for buildings under future applications. Public open space public realm proposed in the project will not be taken in charge”.

One of the key issues identified within the Parks and Landscaping Services report relates to the impact of the height and orientation of the proposed buildings on the overall quality of the proposed open spaces and insufficient information provided within the Sunlight and Daylight Assessment as detailed in the extract below:

3.1. Building form and access to light.

The height and orientation of proposed buildings will create areas with lower exposure to natural light. A daylight assessment report has been submitted (IES 1831). The information presented is incomplete and the ground level open spaces do not seem to have been assessed in detail. In the assessment of proposed amenity areas the areas assessed combine to achieve BRE standards. There will be communal areas between block that receive little to no direct sunlight due to the building block orientation and height. The ability of residents to access rooftop external space will allow access to better daylight/sunlight conditions.

Assessment for the ground level open space should be presented. It is expected that there will be significant areas in shadow and the assessment should be used to fine-tune positioning of facilities (e.g. play area, seating areas etc.) to allow reasonable access to daylight/sunlight.

Other points raised within the report relate to the potential provision of a zone for active recreational use/ event zone within the central square, opportunities for vertical greening for the highline support structure, public art and detailed design considerations for the landscaping proposals. Such points could be addressed by means of condition in the instance that planning permission was granted for the development.

The report concludes the following in respect of the proposal:

Parks and Landscape Services have reservations on the quality of public open space within the scheme and its ability to contribute to the deficit of public open space in the inner city for both the new residents and the existing community. The provision of a defined unit of public open space offering both active and passive recreational activities has not been achieved and this should be assessed by ABP in the context of the site zoning.

Other issues raised may be addressed in conditions subject to approval of the development.

The concerns in relation to the quality of the proposed open space are shared by the planning department and also identified within the report received by the City Architects in respect of the proposal.

Access and Transportation

The application site is strategically located in terms of its proximity to the transport interchange at Connolly Station. The redevelopment of an underutilised brownfield site adjacent to a public transport hub to accommodate a high density mixed use development is supported by the planning authority.

At present limited permeability is provided through the site. The site presents defensive and primarily enclosed boundaries along Sheriff Street Upper and Oriel Street Lower. No access points are provided to the east along Oriel Street Upper and to the north from Seville Place. The SHD application introduces pedestrian linkages through the site which is welcome and principle by the planning application. A potential linkage to Connolly Station from the proposed highline space is also identified in the application documentation subject to agreement with CIE. The provision of such a link would be supported by the planning authority.

Vehicular access to the site is currently provided via Sheriff Street Lower. This access currently serves the 390 CIE car parking spaces on site. As part of the subject application revised access arrangements are proposed to the site via Oriel Street Lower. This includes a 2 way fire tender access to the railway station and a single lane basement access. 58 no. car club spaces are proposed at basement level to serve the proposed residential use. 1,406 cycle parking spaces are proposed within the application.

In addition to the above application documentation relates to the provision of 135 no. car parking spaces for CIE use overhanging the railway sidings at 3rd floor level. Drawing no. 0107 prepared by OCSC indicates that access to these spaces will be provided via the proposed fire tender access. As detailed earlier in this report the CIE parking spaces are not included within the development description and a rationale for this approach is included within the legal opinion attached as Appendix 1 of the ABP Opinion response document.

The proposed access arrangements and submitted transportation related documents including Chapter 6 of the EIAR, Transport Impact Assessment and Road Safety Audit have been subject to review by the Transportation Planning Division. The report prepared by the Transportation Planning Division outlines the following in respect of access arrangements proposed as part of the final application:

Notwithstanding the information contained in the TIA and the concerns noted regarding the data and information provided, one of the main concerns to this division is with regards to the proposed access ramp/road serving the residential car parking, Irish Rail/CIE car parking and the fire-tender access road. It should be noted that the drawings and documentation submitted are inadequate and unclear in relation to the operation of the access roads/ramps and therefore this division has had to make assumptions on the apparent intended operation of these roads due to the inadequacy of the drawings and absence of any design rationale for said access ramps/road.

The access/egress arrangements appear to have altered from those proposed at Pre-application Consultation stage. At pre-application consultation, a two way ramp was proposed to access the basement car park with a two way access ramp to be used as fire tender access. In the current application, the fire tender access road has been maintained as a two way ramp, but the access to the basement car parking has been indicated a single lane ramp, with a two way cycle track adjacent to the single lane. The single lane access/egress to the basement car parking spaces is shown to be managed via a traffic light shuttle system. The architectural drawings for the scheme show the two way ramp as fire tender access only. However, the OCSC engineering drawings show this 'fire tender only' two way ramp as serving the third floor CIE car parking spaces while not actually providing a detailed layout from route

of ramp into car park. It is also noted that the fire tender auto-track drawings show required turning movements within the area of the third floor car park. In order to facilitate a proper assessment of the overall access arrangements including those for fire tender, the third floor car park and layout should have been included in the development.

Regarding the proposed operation of the access/egress to the basement car park, a traffic light shuttle system operates on the basis of priority entry/exit controlled by sensors. The main disadvantage associated with operating a traffic light shuttle system in a car park is that it can lead to queueing. While queueing to exit at the top level is contained within the car park and therefore would not appear to impact on the road network, the potential for cars queueing at ground level waiting to enter is significant. This division would only support the use of a traffic shuttle system in a development with minimal car parking i.e. 10-15 cars in a quiet location where the potential for queueing would be reduced given the volume of cars that may be entering/exiting at any one time. The use of a shuttle system to serve 58 no. car parking spaces would be unacceptable to this division, having regard to the potential for queueing across the shared public realm plaza onto Oriel Street Upper, affecting the junction at Seville Place and in turn potentially the junctions at Sheriff Street Lower and Amiens Street.

The proposed development has indicated the provision of a two way cycle track extending from the entrance at Oriel Street Upper, across the public realm plaza and into the basement car parking. This two way cycle track has been extended from that previously proposed in Pre-Application Consultation and delineated as an on-ramp cycle track the full length of the access ramp (previously it was not delineated as a segregated route until the start of the basement car park ramp). While it has been noted that the level of car parking provision has been reduced from that proposed at Pre-Application consultation, the concerns of this division still remain with regard to the potential pedestrian and vehicular conflict concentrated at this single vehicular access/egress. The proposed development will be both a through route and a destination for pedestrians. Retail and commercial units are proposed at ground floor levels in blocks within this development where a high level of pedestrian activity would be expected from both visitors to and residents of the development. The introduction of a traffic light shuttle system to serve the basement car park, the maintenance of a commercial car park within the development and the utilisation of this access for service vehicles to use the concealed yard in Block C results in an overconcentration of uses from a single access/egress point, leading to increased potential for pedestrian/cyclist and vehicular conflict.

Furthermore, the Road Safety Audit (RSA) submitted has not evaluated the operation of this ramp access and basement car park and therefore the designer's response to the issues concluded in the RSA relate predominately to works on the surrounding road network, all outside of the applicant's control and therefore outside the red line boundary. The RSA concludes that while the applicant is willing to undertake the design and construction of these works in consultation with the Roads Authority, the applicant is seeking the funding of these works to be fully offset against development contributions levied against the applicant. This is a mechanism that is not supported by Dublin City Council; it is further reiterated that the applicant has not had any further consultation with this division regarding any works outside of the development site since the issuing of the formal opinion from An Bord Pleanála in June 2019.

The Transport Planning division welcomes the redevelopment of Connolly Station and considers it an opportune site for an integrated land-use and transport development hub. This division considers the location to have the potential to be an exemplar of high density, integrated land use and transportation development in the City and recognises the need to regenerate and redevelop this area of the City. As has been reiterated throughout the pre-application consultation process for this site, this division has no objections to the non-provision of car parking at this location.

Notwithstanding the above, this Division has significant concerns regarding the proposed development. The access/egress arrangements proposed are unacceptable. A single shuttle light controlled ramp to serve 58 car parking spaces will generate extensive queueing through the pedestrian plaza, across a cycle track and fire tender access and on to the adjacent road network, thereby creating unacceptable traffic impact and a traffic hazard. It is considered that a redesign of the access arrangements is required and that this would have a significant impact on the overall design of the scheme. The omission of the 180 car parking spaces from a robust assessment of the development is also unacceptable. The documentation includes serious deficiencies in information, including lack of clarity around the operation and management of the Irish Rail/CIE car parking spaces and their omission from the Car Parking Management Strategy, the failure to have regard to the changes in car parking provision and use in the Traffic Impact Assessment.

This division would, if it were possible, recommend that Further Information be submitted to revise the access arrangements and to include the 180 spaces and assessment of same in the SHD application.

Having regard to the above reasons and considerations it is clear that revisions to the previously proposed access arrangements have been included within the final application documentation and concerns are identified by the Transportation Planning Division in relation to the proposed access arrangements. In this regard there are technical transportation issues with the submitted application which would need to be addressed.

Other Reports

Lighting Proposal

A Site Lighting Report is submitted in conjunction with the application this outlines that *"the recommended light levels are being achieved and no light pollution on adjacent properties exist, as the proposed design avoids lighting/illuminating in the direction of the partially surrounded properties"*. The biodiversity officer's report has recommended a revised lighting strategy for the site which demonstrates compliance with the mitigation measures within the EIAR. As earlier detailed the proposed lighting plan should be extended to include the proposed access to the site from the vault from Seville Place.

Flood Risk Assessment

A site specific flood risk assessment is submitted in conjunction with the application. No issues have been raised by the drainage division in this regard.

Conclusion

The proposal is for redevelopment of an underutilised brownfield site adjoining a major transport interchange in a city centre location. The proposed redevelopment of the site for residential use, with active uses at street level, is welcome in principle and is in keeping with the zoning objective, subject to the balance of the site being redeveloped for non-residential uses in accordance with the Masterplan for the site. The proposal is also in keeping with the provisions of the National Planning Framework in relation to securing development of brownfield sites at sustainable densities.

The proposed residential units are generally in accordance with development plan and departmental standards in relation to apartment sizes and open space provision for build-to-rent developments. The development plan allows for buildings in excess of 50m high at this location, subject to compliance with criteria including relationship to context, effect on the historic environment, contribution to the public realm, visual impact and microclimate and general amenity considerations.

While the proposal is considered to be acceptable in principle and to provide for a sustainable form of development on a city centre brownfield site, there is concern in relation to transportation issues including the lack of assessment of the CIE car parking spaces and proposed access arrangements, and information deficiencies within the sunlight and daylight assessment in terms of the lower level residential units and the quality and usability of the public realm. Such concerns are detailed within the above report and summarised below.

The planning authority has concern in relation to information deficiencies within the submitted Sunlight and Daylight assessment in terms of the quality of the proposed open space and residential units at lower levels, which would represent a worst case scenario. This information was requested by the planning authority at pre application stage and ABP opinion stage and the concerns raised in relation to the content and scope of the Sunlight and Daylight Assessment have not been addressed within the final application documentation. The planning authority is of the opinion that design changes would be required to the scheme to demonstrate compliance with BRE standards and to ensure the quality and usability of the public realm. In normal instances this would be subject to a request for further information.

Revisions to the previously proposed access arrangements have been included within the final application documentation and concerns are identified by the Transportation Planning Division in relation to the proposed access arrangements. In this regard there are technical transportation issues with the submitted application which would need to be addressed.

The above concerns raised remain unresolved and the planning authority considers that revised proposals would be required to address such concerns. Furthermore the content of the submission on the

application by the Irish Aviation Authority which indicates that agreement is required in relation to the proposed landmark building is noted.

In addition to the above the planning authority has concern in relation to the proposed CIE car parking spaces which are not included within the development description in the public notices or appropriately assessed within the application documentation. The case made within the legal opinion is noted but notwithstanding this the planning authority has concern in relation to the approach adopted within the application wherein the use and impact of the use of the car park is not assessed. The planning authority acknowledges that parking is provided on the site at the moment but not at 3rd floor level overhanging the railway sidings for CIE. It is the opinion of the planning authority that the provision of a commercial car park as part of the development constitutes development and requires planning permission. The provision of parking at the location indicated raises planning considerations in terms of compatibility with the proposed development which has not been appropriately identified or addressed within the application documentation. In the instance that An Bord Pleanála is minded to grant planning permission for the proposed development it is recommended that this car park should be omitted.

In this regard it is considered that the applicant has not satisfactorily responded to the technical concerns raised by the planning authority at both pre application stage and opinion stage within the final application documentation. In normal instances the planning authority would recommend a request for further information to address the issues identified in this report.

Recommended Conditions

Notwithstanding the above, in the instance that the Board is of the opinion that sufficient information has been provided within the application to adjudicate a decision on the proposal and a recommendation to grant permission is deemed appropriate the following conditions are recommended by the planning authority:

1. Insofar as the Planning & Development Act 2000 (as amended) and the Regulations made thereunder are concerned, the development shall be carried out in accordance with the plans, particulars and specifications lodged with the application, save as may be required by the conditions attached hereto. For the avoidance of doubt, this permission shall not be construed as approving any development shown on the plans, particulars and specifications, the nature and extent of which has not been adequately stated in the statutory public notices.

Reason: To comply with permission regulations.

2. The residential units hereby permitted shall operate in accordance with the definition of Build-to-Rent developments as set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (March 2018).

Reason: In the interest of the proper planning and sustainable development of the area.

3. The development hereby permitted shall operate as a Build to Rent Development as set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (March 2018). The scheme shall be professionally managed, where individual rooms are rented within an overall development that includes access to shared or communal facilities and amenities. Prior to the commencement of development, final details of the proposed communal facilities shall be submitted for written agreement of the planning authority.

Reason: In the interests of the proper planning and sustainable development of the area.

4. Prior to the commencement of development, the developer shall submit, for the written consent of the planning authority, details of a proposed covenant or legal agreement which confirms that the development hereby permitted shall remain owned and operated by an institutional entity for a minimum period of not less than 15 years and where no individual residential units shall be sold separately for that period. The period of fifteen years shall be from the date of occupation of the first 'shared living units' within the scheme.

Reason: In the interests of the proper planning and sustainable development of the area.

5. Planning permission is not granted for the CIE car parking spaces and these shall be subject of a separate planning application.

Reason: To clarify the scope of the permission.

6. The development shall be revised as follows:

- a. Block B2 above podium level shall be omitted from the development
- b. The overall residential unit mix within the scheme shall be revised to provide a maximum of 60% of studio and 1 bed apartment units and a minimum of 40% 2 and 3 bed units within the scheme in order to promote the optimal supply of apartments for a range of needs and aspirations and the need to create long term sustainable communities.

Development shall not commence until revised plans, drawings and particulars showing the above amendments have been submitted to, and agreed in writing by the Planning Authority, and such works shall be fully implemented prior to the occupation of the buildings.

Reason: In the interests of orderly development, visual amenity and to promote the optimal supply of residential units to create long term sustainable communities.

7. Prior to the commencement of development revised drawings/details shall be submitted for written agreement of the planning authority to address the following:
- a. Revised layout of refuse area in Block D and enhanced accessibility from Block D1 to the refuse area
 - b. Revised internal layout for proposed 01 studios in Block C with relocated cooking facilities
 - c. Green roof access in Block D2 Level 1 should be clarified.
 - d. The floor plans indicate doors from corridors/landing areas into open air and should be clarified.
 - e. 'Residential amenity' and resident support facilities within the development shall be agreed with the planning authority and detailed on the plans
 - f. Anomalies in terms of layout illustrated at ground, first and second floor within drawings RKD –XX-00-DR-A-1004, A1005, A1006 and Drawings RKD –00-00-DR-A-1004, A1005, A1006. Final layouts should be agreed with the planning authority.
 - g. Revised drawings which illustrate balcony type, provision and access to be clearly delineated
 - h. The proposed retail unit at Block D includes a large plant area at ground floor level as detailed in Drawing Block D – Plan Level 00. Revised proposals to provide a more appropriate frontage should be provided in this regard.
 - i. Revisions to the plant and lift/ stair overruns at roof level of the proposed blocks to reduce their visual impact.

Reason: In the interests of orderly development and the visual amenities of the area.

8. Prior to the commencement of development the following details shall be submitted for written agreement of the planning authority:
- a) A landscaping plan which illustrates the provision of 10% public open space within the development. In the instance that this cannot be provided the planning authority can give consideration to the provision of a contribution in lieu of the shortfall in public open space.
 - b) Drawings and cross sections which clearly illustrate proposed boundary treatments for all site boundaries.
 - c) Further detail of the proposed undercroft area of the highline shall be submitted for written agreement.

Reason: In the interests of orderly development and the visual amenities of the area.

9. Prior to the commencement of development, details of the materials, colours and textures of all the external finishes to the proposed development shall be submitted to and agreed in writing by the Planning Authority. A panel of all the proposed finishes shall to be placed on site to enable the planning authority adjudicate on the proposals. Construction materials and detailing shall adhere to the principles of sustainability and energy efficiency and high maintenance detailing shall be avoided.

Reason: In the interests of orderly development and the visual amenities of the area.

10. Prior to the commencement of development the developer shall submit a maintenance strategy for materials within the proposal for written agreement of the planning authority.

Reason: In the interests of orderly development and the visual amenities of the area.

11. Prior to the occupation of the development, a schedule of proposed uses for the proposed ground floor retail and commercial units shall be submitted for written agreement of the planning authority.

Reason: In the interests of the proper planning and sustainable development of the area.

12. Prior to occupation of the ground floor units the developer shall submit full details of the location and management of the area to be reserved for social, cultural, creative and artistic purposes, This shall amount to 5% of the floor area of the permitted development.

Reason: In the interests of the proper planning and sustainable development of the area.

13. Prior to the commencement of development, an Adaptability Study for the development shall be submitted for written agreement of the planning authority.

Reason: In the interests of the proper planning and sustainable development of the area.

14. Levy condition

15. Part V condition

16. Development shall not commence until a landscape scheme prepared by a suitably qualified landscape architect comprising: full details of the size, species and location of all trees and shrubs to be planted and the treatment of all external ground surfaces and landscape structures together with a daylight assessment for the ground level and ROSPA report for any play facilities, additional recreational facilities, details of public art following liaison with the Dublin City Arts Office, green roof details for Block A, enclosures for roof gardens, ground level routes for visually impaired, roadside tree planting and vertical greening to high-line support structures has been submitted to and agreed in writing by the Planning Authority (The landscape scheme shall have regard to the Guidelines for Open space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

Reason: In the interests of amenity, ecology and sustainable development

17. The agreed landscape scheme shall be implemented fully in the first planting season following completion of the development or each completed phase of the development as agreed with the Planning Authority, and any trees or shrubs which die or are removed within 3 years of planting shall be replaced in the first planting season thereafter. The landscape architect will give their written opinion on compliance of the implemented landscape with the agreed landscape scheme. (The landscape scheme shall have regard to the Guidelines for Open space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division.

Reason: in the interests of amenity, ecology and sustainable development

18. The applicant/developer will be responsible for maintenance and management of the public open spaces. The public open spaces will operate as public park/public realm in perpetuity, with public access and use operated strictly in accordance with the management regime, rules and regulations including any byelaws for public open space of the Planning Authority at all times.

Reason: In the interest of residential amenity and to secure the integrity of the proposed development including open spaces.

19. No gates shall be erected at entrances to the site from Sheriff Street Upper, Oriel Street Lower or Seville Place.

Reason: In the interests of public permeability and planning gain, and to ensure compliance with public open space requirements.

20. Any external signage shall be the subject of a separate application for permission. All signage to ground floor units should consist of individual lettering mounted or hand painted on building, with the lettering to be of an appropriate scale and consist of a high quality material such as stainless steel.

Reason: In the interests of visual amenity.

21. Notwithstanding the provisions of the Planning and Development Regulations (2001, as amended) no advertisement signs (including any signs installed to be visible through the windows), advertisement structures, banners, canopies, flags or other projecting elements shall

be displayed or erected on the building or within its curtilage, or attached to the glazing, without a prior grant of planning permission.

Reason: In the interests of visual amenity.

- 22.. The mitigation measures set down in the EIAR shall be implemented in full during the construction and operation of the permitted development.

Reason: In the interests of environmental amenity.

23. The developer shall comply with the requirements of Iarnród Éireann as set out in their submission.

Reason: To protect existing railway infrastructure.

24. The developer shall comply with the requirements of the Irish Aviation Authority as set out in their submission.

Reason: In the interests of orderly development and safety.

25. The developer shall comply with the requirements of the Department of Culture, Heritage and the Gaeltacht as set out in their submission.

Reason: In the interests of orderly and sustainable development.

26. Prior to the commencement of development, the developer shall agree in writing the requirements of the Transportation planning Division which shall include the following:

- a) The CIE car parking spaces shall be omitted from the development.
- b) Revised proposals which incorporate revisions to the access, circulation and ramp arrangements within the site to the development having regard to the following guidance - A shuttle light arrangement is not acceptable. All ramps should be two way. Design should minimise potential conflict between vehicles, pedestrians and cyclists. Priority should at all times be given to pedestrians and cyclists. Management measures such as signing and lining should be put in place to ensure this.
- c) An independent Road Safety Audit should be undertaken of revised design.
- d) Mobility Management Plan and Car Parking Strategy reflecting any changes as a result of above to be agreed with DCC.
- e) Any alterations to the public road network deemed necessary to facilitate the development shall be identified and agreed in writing with DCC prior to commencement of development and shall be undertaken at the applicant's expense.

Reason: In the interests of orderly and sustainable development.

27. The developer shall comply with the following requirements of the Conservation Officer:

- a. A Grade 1 Conservation Architect or equivalent Conservation Consultant shall be appointed to guide the recording, fabric survey, investigative works, temporary remedial works, taking down and reconstruction of boundary wall, new junctions with historic fabric, protection of historic fabric during demolition and construction process, and conservation repairs to the historic fabric, to safeguard the architectural heritage and designed interventions and conservation repairs.
- b. Where historic fabric is to be altered or removed, the structures are to be recorded in accordance with the Heritage Council's policy for recording industrial archaeology, a permanent record of which shall be provided to the Local Authority and the Irish Architectural Archive.
- c. The following information should be provided for the written agreement of the Local Authority:
 - Detailed architect's and structural engineer's sectional drawings (1:50, 1:20), including details of underpinning and retaining walls should be provided for all

key interfaces/junctions between the proposed works and the existing elements of the Connolly Station Protected Structure that will be affected by the construction of the new basement and vehicular ramp, new entrance from Seville Place, and other parts of the buildings.

- Detailed methodology shall be provided for the temporary dismantling and reconstruction of the boundary wall onto Oriel Hall.
- A photomontage view shall be provided to demonstrate the impact of the proposed development on the residences located on Oriel Hall.
- Detailed methodology shall be provided for the removal of part of the boundary wall onto Oriel Street Upper. The proposed connection from Oriel Street into the new street shall be formed by a series of contemporary openings within the wall fabric, thus retaining more of the protected structure than is currently indicated in the drawings and View 25. The openings may be constructed in a contemporary manner framed by steelwork, but ensuring retention of more of the fabric than is currently proposed, and connecting into the wall that will be reconstructed onto Oriel Hall.
- Detailed schedule to be prepared of all salvaged material, and confirmation of where this fabric will be incorporated into the proposed development works.

Reason: In the interests of orderly and sustainable development.

28. The developer is required to commission a qualified ecologist who is a member of the Chartered Institute of Ecology and Environmental Management (or equivalent) to re-survey the site for invasive alien species designated under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (2011) during the growth cycle of invasive alien plants to verify there are none present. A verification report must be produced prior to commencement of construction to Dublin City Council. If any IAS are present, an IAS Management Plan is also to be provided to Dublin City Council, in accordance with the species-specific guidance for contractors working in the DCC administrative area in the Dublin City Council Invasive Alien Species Action Plan (2016-2020). Implementation of any IAS Management Plan must be monitored and signed off by the project ecologist in agreement with Dublin City Council. No works are to take place until actions of an IAS Management Plan are completed. Depending on the IAS in question, post-construction monitoring may be required to ensure controls have been successfully carried out. Any records of IAS found on the site are to be submitted to Dublin City Council and the National Biodiversity Data Centre (NBDC) using the NBDC standard reporting form to inform future planning and ensure monitoring.

Reason: To prevent the spread of invasive alien species in accordance with EU Regulation 1143/2014, the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477 of 2011) Dublin City Council Invasive Alien Species Action Plan (2016-2020); and to protect biodiversity in accordance with the Dublin City Development Plan and Dublin City Biodiversity Action Plan.

29. Prior to commencement of works to the stone arches, the buildings are to be checked for presence of bats by a licensed bat worker through vault inspection, in accordance with the recommendation of the bat survey (6.1.3). If any bats are present, then the applicant is required to seek a consent license from the NPWS to remove the bats. All works are to be carried out in accordance with NPWS Guidelines (IWM 25). This includes verification of absence of winter hibernation roosts. Note that this is a legal requirement under the Wildlife Acts.

Reason: To ensure protection of bat species in accordance with the EU Habitats Directive and the Wildlife Acts.

30. Prior to the commencement of development the developer shall submit a revised lighting plan for the application site for written agreement with the planning authority. This plan shall include the proposed access to the site from Seville Place. The revised lighting plan shall demonstrate co-ordination of the architectural and landscape architectural plans with the recommended mitigation measures in the EIAR (p. 25, Section 6.1.1) and that has been verified by a qualified ecologist as meeting the mitigation requirements.

Reason: To ensure safety of all proposed access point and ensure the protection of bat species in accordance with the EU Habitats Directive and the Wildlife Acts. To ensure mitigation is adequate and realised in accordance with the EU Environmental Impact Assessment Directive.

31. The applicant shall provide pollinator-friendly planting in proposed communal open space in accordance with the All-Ireland Pollinator Plan and the Dublin City Development Plan and City Biodiversity Action Plan. The planting plan shall be agreed with Dublin City Council Parks and Landscape Services. The recommendations in the Bat Survey in the Appendix of the EIAR (p. 26) are to be fully incorporated into the landscape plan.

Reason: To ensure provision of feeding resources for bats under the EU Habitats Directive and meet national and local Biodiversity Action Plans.

32. The applicant shall provide areas of green roof(s) in accordance with the All-Ireland Pollinator Plan and the Dublin City Development Plan and City Biodiversity Action Plan. The detailed design and maintenance plan shall be prepared with the input of a qualified ecologist and shall be agreed with Dublin City Council Parks and Landscape Services. The recommendations in the Bat Survey in the Appendix of the EIAR (p. 26) are to be fully incorporated into the design. The design of continuous planting areas which incorporate native species is necessary to ensure meaningful areas for wildlife.

Reason: To ensure provision of feeding resources for bats under the EU Habitats Directive and meet national and local Biodiversity Action Plans. To reduce surface water run-off under the EU Floods and Water Framework Directives in accordance with the City Development Plan.

33. Prior to commencement of works, the applicant will ensure the buildings are to be checked for presence of breeding herring gulls by a qualified ecologist. If any breeding birds are present, then the applicant is required to seek a consent license from the NPWS to accommodate the works. The applicant is to ensure that the building roof is to remain suitable for nesting post-construction and cannot include any deterrence measures in its design or construction.

Reason: To ensure protection under the EU Birds Directive and the City Biodiversity Action Plan.

34. Prior to commencement of works, the applicant will ensure the buildings are to be checked for presence of breeding passerine species by a qualified ecologist. A verification report is to be provided to Dublin City Council to ensure compliance. If any breeding birds are present, then the applicant is required to seek a consent license from the NPWS to accommodate the works. The applicant is to ensure that the building roof is to remain suitable for nesting post-construction, with measures agreed with Dublin City Council, and cannot include any deterrence measures in its design or construction.

Reason: To ensure protection under the Wildlife Acts and the City Biodiversity Action Plan.

35. Prior to the commencement of development a revised noise assessment shall be submitted for written agreement of the planning authority. The Noise management measures shall include greater management plans for those dwellings situated closest to railway lines. While double glazed windows may be satisfactory, triple glazed is advised to mitigate the nuisance likely to arise from railway noise.

Reason : In order to safeguard residential amenities and to ensure a satisfactory standard of development.

36. The developer shall comply with the following requirements of the Drainage Division:
- a. There is no objection to this development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads).
 - b. The drainage for the proposed development shall be designed on a completely separate foul and surface water system with a combined final connection discharging into Irish Water's combined sewer network. Dead leg for future surface water connection shall be provided

- c. Records of public surface water sewers are indicative and must be verified on site.
- d. All surface water discharge from this development must be attenuated to two litres per second per hectare in accordance Greater Dublin Regional Code of Practice for Drainage Works Version 6.0
- e. An appropriate petrol interceptor shall be installed on the internal drain from the car park. Please refer to section 20 of the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0
- f. The development shall incorporate Sustainable Drainage Systems in the management of surface water as outlined in the Engineering Services Report by OCSC and associated drawings.
- g. Flood mitigation measures detailed in the submitted Site Specific Flood Risk Assessment by OCSC Consulting Engineers shall be implemented in full
- h. Permanent discharge of groundwater to the drainage network is not permitted.
- i. Discharge of groundwater to the public drainage network may be permitted during construction subject to a trade effluent discharge license being obtained from the relevant sanitary authority as required by the Local Government (Water Pollution) Acts, 1977 and 1990
- j. To minimise the risk of basement flooding, all internal basement drainage must be lifted, via pumping, to a maximum depth of 1.5 metres below ground level before being discharged by gravity from the site to the public sewer.
- k. The outfall Surface Water manhole from this development must be constructed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.
- l. All private drainage such as, downpipes, gullies, manholes, armstrong junctions, etc. are to be located within the final site boundary. Private drains should not pass through property they do not serve.

Reason: To ensure a satisfactory standard of development.

37. Prior to commencement of development a valid connection agreement shall be put in place between the developer and Irish Water.

Reason : To ensure a satisfactory standard of development.

38. The developer shall comply with the requirements set out in the Codes of Practice from the Drainage Division, the Roads Streets & Traffic Department and the Noise & Air Pollution Section.

Reason To ensure a satisfactory standard of development.

39. Prior to the commencement of development the following requirements of the Environmental Health Officer, Waste Management Section shall be submitted for written agreement of the planning authority:

- a) A full list of up to date authorised waste collection permit NWCPO numbers and if sub-contractors are to be used please include permit details.
- b) Details of destination facilities that authorised waste collection holders intend to use.

- c) Letters on headed paper signed by a relevant competent person from the facilities confirming acceptance of material and tonnages agreed specifically referencing the site.
- d) A more detailed response in relation to quantities.
- e) Please ensure and confirm that waste dockets used are specific to the authorised waste collector that collected the waste load.
- f) Please furnish contact details for the appointed site manager.
- g) Please be aware that crushing concrete onsite will need a waste facility permit and so an application will be necessary for the carrying out of this activity. If waste facility permit is required please see condition 7b.
- h) Please acknowledge and confirm that material crushed onsite will be disposed of off-site at an authorised facility e.g. Licenced/Permitted Note: Crushed material from a waste recovery operation is not appropriate for the Article 27 Notification procedure.
- i) Please complete laboratory testing of soil onsite and provide Haz. Waste Online and laboratory results.
- j) Please complete an invasive plant species survey prior to development and if found to be present provisions on how this will be dealt with e.g. treatment etc.
- k) Copy of an asbestos survey carried out prior to development and if found to be present provisions on how this will be dealt with e.g. waste collection, disposal etc. and professional indemnity insurance cover page.
- l) Waste logs to be available in up to date digital formats for inspection.

Reason: In the interests of residential amenity and public health.

40. Prior to commencement of development, and on appointment of a contractor, a Construction Management Plan shall be submitted to the Planning Authority for written agreement. This plan shall provide details of intended construction practice for the development, including a detailed traffic management plan, hours of working, details of service access and delivery arrangements during construction works, noise management measures and off-site disposal of construction/demolition waste.

Reason: In order to ensure a satisfactory standard of development.

41. a) The site and building works required to implement the development shall only be carried out between the hours of:
- Mondays to Fridays – 07.30 to 18.00
 - Saturdays – 08.00 to 14.00
 - Sundays and public holidays - No activity on site.

Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from Dublin City Council. Such approval may be given subject to conditions pertaining to the particular circumstances being set by Dublin City Council.

Reason: In order to ensure a satisfactory standard of development and safeguard the amenities of adjoining residential development.



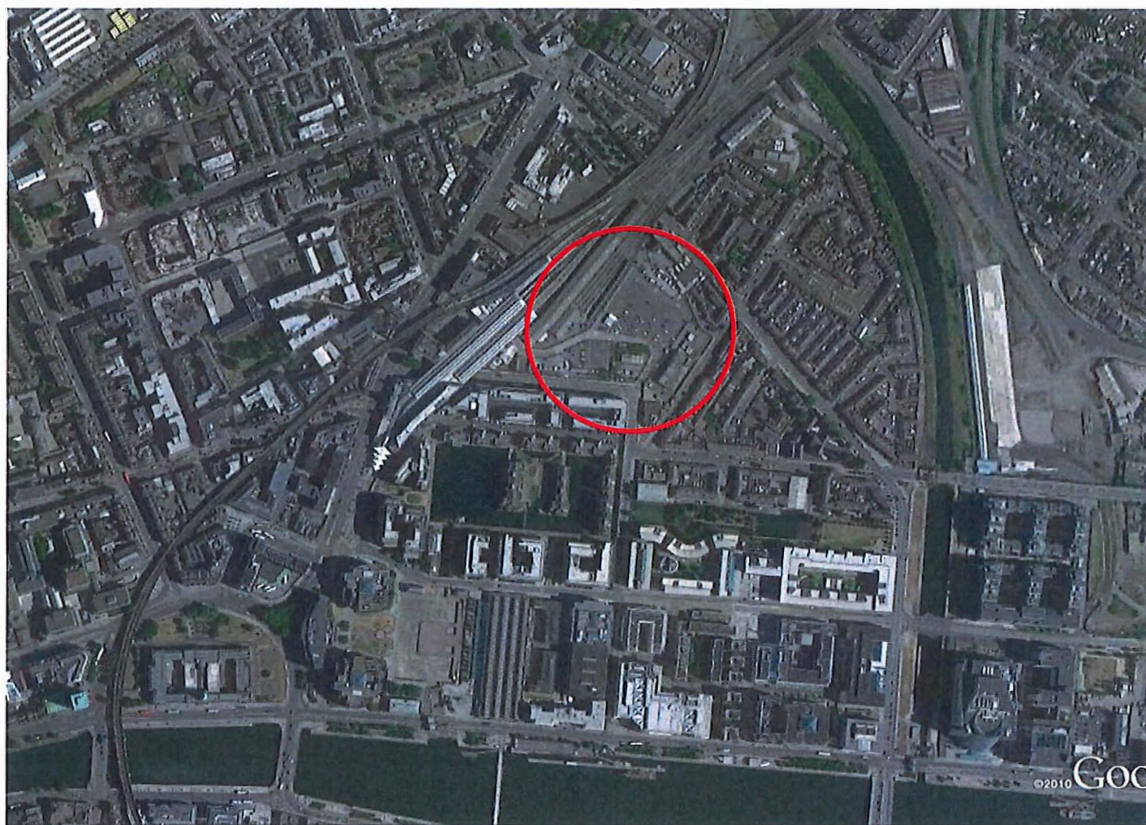
Stephanie Farrington
Senior Executive Planner
9th of December 2019



SHD Application: SHD0024/19 Connolly Station Lands D1

Comments by DCC Parks & Landscape Services

November 28th 2019



1. Development description

The application proposes the large scale development of former CIE lands near Connolly Station within Dublin's inner-city. The development proposals include the provision of 741 residential units retail and commercial uses and associated on lands zoned Z5. The application's landscape submission proposals provide for open space for both future residents and the local community at three levels, an open publically accessible ground level resource, an elevated communal high-line provision and private roof gardens. The ground plane landscape architecture concept is based on evolution and well developed proposals are presented. The elevated highline provides a connected recreational communal open space for residents and the roof provision include a dual provision of proposed brown roofs for biodiversity and accessible roofs for residents. Temporary landscape planting is provided on two sites for buildings under future applications. Public open space public realm proposed in the project will not be taken in charge.



Illustration of development proposals.

2. Existing landscape context

Open space distribution and access is not uniform within the City Council administrative area and areas within the inner-city have less open space per person. In the Central Area, which includes this application site, provision is low at under 2 m²/person while the city-wide average is 36m²/person (source: Dublin City Parks Strategy). In addition, the increase in apartment living within the inner-city places greater emphasis on providing open space resources for public recreation and community building. The nearest accessible public parks to the site are Sherrif Street Park (230m approx.) and Liberty Park (400m approx.).

3.Key issues

3.1.Building form and access to light.

The height and orientation of proposed buildings will create areas with lower exposure to natural light. A daylight assessment report has been submitted (IES 1831). The information presented is incomplete and the ground level open spaces do not seem to have been assessed in detail. In the assessment of proposed amenity areas the areas assessed combine to achieve BRE standards. There will be communal areas between block that receive little to no direct sunlight due to the building block orientation and height. The ability of residents to access rooftop external space will allow access to better daylight/sunlight conditions.

Assessment for the ground level open space should be presented. It is expected that there will be significant areas in shadow and the assessment should be used to fine-tune positioning of facilities (e.g. play area, seating areas etc.) to allow reasonable access to daylight/sunlight.

3.2. Public Open Space and the community.

The landscape architectural design presents a more corporate/retail landscape and would benefit with zones that enhance community usage, given the deficit of public open space in the inner city. A zone for active public recreation (including e.g., a play area and basketball / kick about area/ outdoor gym) and an event zone (e.g. for a farmer's market / evening movies etc.) possibly to the central square, should be designed into the proposals, including any other proposals that would create positive public use of the open space.

There has been a limited response to this issue raised at the pre-application stage and therefore further details and design amendment should be presented. Public access and use of ground level open space should be safeguarded through appropriate conditions.

3.3 Greening buildings.

The proposals provide for extensive use of green roofs including the use of brown roofs for biodiversity, which is welcomed. This treatment should also be extended more fully to Block A.

Vertical greening should be applied more extensively within the proposals. In particular, opportunities to create vertical greening for the Highline support structures should be included.

3.4. Public Art.

DCC Parks & Landscape Services support the provision of public works of art in the city's public realm. In particular a better geographical distribution of public art across the city is supported, as is the creation of works by emerging artists. Public art should be provided as part of the public open space proposals. DCC's Public Arts Office may assist with advice on procurement of artwork.

No further information on the provision of public art has been provided in the application.

3.5. Detailed design considerations

Sheltered areas/ canopies/ pods should be provided for all roof top gardens to facilitate use by residents during adverse weather conditions. 50% of all external seating shall include back rests and arm rests to facilitate use by all. Privacy planting strips/ gardens screens shall be provided between ground level/ roof garden level apartment windows and open space areas to maintain privacy for residents. Details of ground level access and routes for visually impaired to be clarified on landscape plans.

Further information will be required on these design issues.

4. EIAR and AA

(to be forwarded under separate cover)

5. Conclusions

Parks and Landscape Services have reservations on the quality of public open space within the scheme and its ability to contribute to the deficit of public open space in the inner city for both the new residents and the existing community. The provision of a defined unit of public open space offering both active and passive recreational activities has not been achieved and this should be assessed by ABP in the context of the site zoning.

Other issues raised may be addressed in conditions subject to approval of the development.

6. Conditions

The following draft conditions are recommended:

End.

Landscape Scheme to be submitted

Development shall not commence until a landscape scheme prepared by a suitably qualified landscape architect comprising: full details of the size, species and location of all trees and shrubs to be planted and the treatment of all external ground surfaces and landscape structures together with a daylight assessment for the ground level and ROSPA report for any play facilities, additional recreational facilities, details of public art following liaison with the Dublin City Arts Office, green roof details for Block A, enclosures for roof gardens, ground level routes for visually impaired, roadside tree planting and vertical greening to high-line support structures has been submitted to and agreed in writing by the Planning Authority (The landscape scheme shall have regard to the Guidelines for Open space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

Reason: in the interests of amenity, ecology and sustainable development

Landscape scheme to be implemented

The agreed landscape scheme shall be implemented fully in the first planting season following completion of the development or each completed phase of the development as agreed with the Planning Authority, and any trees or shrubs which die or are removed within 3 years of planting shall be replaced in the first planting season thereafter. The landscape architect will give their written opinion on compliance of the implemented landscape with the agreed landscape scheme. (The landscape scheme shall have regard to the Guidelines for Open space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

Reason: in the interests of amenity, ecology and sustainable development

Open Space Management and Use

The applicant/developer will be responsible for maintenance and management of the public open spaces. The public open spaces will operate as public park/public realm in perpetuity, with public access and use operated strictly in accordance with the management regime, rules and regulations including any byelaws for public open space of the Planning Authority at all times.

Reason: In the interest of residential amenity and to secure the integrity of the proposed development including open spaces.

End.



Archaeology, Conservation & Heritage,
Planning & Property Development Department,
Block 3, Floor 3, Civic Offices, Wood Quay, Dublin 8.

Seandálaíocht, Caomhantas & Oidhreacht
Roinn Pleanála & Forbairt Maoine
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8.

Conservation Officer's Report

To: Stephanie Farrington
Date: 10/12/2019
Ref. No: SHD0024/19
Location: Lands to rear of Connolly Station, Sheriff Street Lower, Dublin 1
Proposal: **PROTECTED STRUCTURE**

Planning and Development (Housing) and Residential Tenancies Act 2016

Planning and Development (Strategic Housing Development) Regulations 2017

Notice of Strategic Housing Development Application to An Bord Pleanála

We, Oxley Holdings Limited, intend to apply to An Bord Pleanála for permission for a strategic housing development at this site at the rear of Connolly Station, Sheriff Street Lower, Dublin 1, D01 V6V6. The subject site encompasses an area of 2.88 hectares.

The development will consist of:

- i. The demolition of 4 no. structures with a combined gross floor area of 3,028sq.m;
- ii. The construction of 741 no. Build to Rent (BTR) residential units in 8 no. apartment blocks ranging in height from 4 storeys to 23 storeys with lower height buildings located adjacent to the northeast and east site boundaries, with a cumulative gross floor area of 68,535sq.m comprising;
 - a. Block B1 (maximum building height 54.917m, total gross internal floor area 11,260sq.m, Apartment Mix: Studio: 25, 1-bed: 37, 2-bed: 51);
 - b. Block B2 (maximum building height 54.917m, total gross internal floor area 10,831sq.m, Apartment Mix: Studio: 20, 1-bed: 35, 2-bed: 51);
 - c. Block B3 (maximum building height 51.767m, total gross internal floor area 9,766sq.m, Apartment Mix: Studio: 22, 1-bed: 60, 2-bed: 27, 3-bed: 1);
 - d. Block C1 (maximum building height 79.450m, total gross internal floor area 12,705sq.m, Apartment Mix: Studio: 84, 1-bed: 40, 2-bed: 41);
 - e. Block C2 (maximum building height 39.615m, total gross internal floor area 4,890sq.m, Apartment Mix: Studio: 9, 1-bed: 33, 2-bed: 3, 3-bed: 4);
 - f. Block C3 (maximum building height 39.650m, total gross internal floor area 6,775sq.m, Apartment Mix: Studio: 40, 1-bed: 18, 2-bed: 23);
 - g. Block D1 (maximum building height 53.392m, total gross internal floor area 8,418sq.m, Apartment Mix: Studio: 10, 1-bed: 25, 2-bed: 44, 3-bed: 1);
 - h. Block D2 (maximum building height 30.950m, total gross internal floor area 3,890sq.m, Apartment Mix: Studio: 18, 1-bed: 8, 2-bed: 11);
- iii. Residential support amenities including 1 no. gym, a resident's lounge, work areas, meeting rooms, dining rooms, recreational areas with a combined GFA of 1,444sq.m;
- iv. Change of use from club house to pedestrian passageway of the existing vault (137sq.m GFA) fronting Seville Place, a Protected Structure (RPS No. 130);

- v. A basement of 7,253.4sq.m with a new vehicular access from Oriel Street Upper incorporating resident's car parking (58 no. spaces), residents cycle parking (640 no. spaces) 7 no. plant rooms (combined 2,228sq.m), waste management facilities (393sq.m)
- vi. 766 no. covered cycle parking spaces for residents and visitors, concierge office (233sq.m) and waste management facilities (126sq.m);
- vii. 'Other Uses' including 10 no. units providing retail, commercial, and community use with a combined GFA of 3,142sq.m;
- viii. A total of 18,562sq.m of hard and soft landscaping comprising a c.2,000sq.m public plaza and other public/communal and private open space located throughout the development;
- ix. A service and emergency vehicle only access ramp from Oriel Street Upper site entrance to serve CIE's transport needs at Connolly Station;
- x. Enabling works of a non-material nature to safeguard the existing vaults (Protected Structures - RPS No. 130) that form part of the subject site fronting Sheriff Street Lower, Oriel Street Upper, and Seville Place during the construction phase;
- xi. All associated ancillary development works including drainage, 6 no. electricity substations, pedestrian access; and
- xii. Works to the masonry wall fronting Oriel Street and the Vaults fronting Seville Place (both a Protected Structure) consisting of the creation of a new vehicular and pedestrian entrance.

The application contains a statement setting out how the proposal is consistent with the objectives of the Dublin City Development Plan 2016-2022.

An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the proposed development.

The application together with the Environmental Impact Assessment Report (EIAR) may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dublin City Council. The application may also be inspected online at the following website set up by the applicant: <https://theconnollyquartershd1.ie/>

Any person may, within the period of 5 weeks beginning on the date of receipt by An Bord Pleanála of the application and on payment of the prescribed fee of €20 (except for certain prescribed bodies), make a submission or observation in writing to An Bord Pleanála, 64 Marlborough Street, Dublin 1, relating to the implications of the proposed development, if carried out, for proper planning and sustainable development in the area or areas concerned, and the likely effects on the environment or the likely effects on a European site, as the case may be, of the proposed development, if carried out. Submissions or observations duly made will be considered by An Bord Pleanála in making a decision on the application. Such submissions or observations must also include the following information:

- (a) the name of the person, authority or body making the submission or observations, the name of the person, if any, acting on behalf of that person, authority or body, and the address to which any correspondence relating to the application should be sent,
- (b) the subject matter of the submission or observations, and
- (c) the reasons, considerations and arguments on which the submission or observations is or are based.

An Bord Pleanála may grant permission for the strategic housing development as proposed, or may grant permission subject to such modifications as it specifies in its decision, or may grant permission in part only, with or without any other modifications it may specify in its decision, or may refuse to grant permission for the proposed development. An Bord Pleanála may attach to a grant of permission such conditions as it considers appropriate.

Any enquiries relating to the application process should be directed to the Strategic Housing Development Section of An Bord Pleanála (Tel. 01-8588100). A person may question the validity of a decision of An Bord Pleanála by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts (S.I.No. 15 of 1986), in accordance with sections 50 and 50A of the Planning

and Development Act 2000 (No. 30 of 2000), as amended. Practical information on the review mechanism can be found in the Judicial Review Notice on the An Bord Pleanála's website: www.pleanala.ie or on the Citizens Information Service website: www.citizensinformation.ie.

Introduction

I have reviewed the documentation submitted by the applicant in relation to the proposed works and comment on the key impacts of the proposed works on architectural heritage as noted below. I attended pre-planning meetings on the 30/8/2018, 30/1/2019, 20/2/2019 and 28/3/2019. I visited the subject site with the Conservation Consultant, and did not enter the historic vault interiors on Sherrif Street Lower or Seville Place, or the interior of Oriel House but have reviewed the photographs provided in the Architectural Heritage.

I have considered the direct and indirect impacts on the historic buildings within and adjacent to the subject site in terms of proposed demolitions and alterations of existing protected and unprotected structures and industrial archaeology, the visual impacts of the proposed development on the immediate environment and the wider historic city context and the implications on the inclusion, or otherwise, of the Historic City of Dublin as a World Heritage Site. (2010 Tentative List, submitted by the Built Heritage and Architectural Policy Section of the Department of the Environment, Heritage and Local Government).

The key considerations which I raised in various pre-planning meetings include the demolition of Oriel House (NIAH Reg. No. 50060567); partial demolition of and other works to the historic boundary walls enclosing the site (part of the Protected Structure Ref.No.130); the retention of the integrity and fabric of the surviving historic vaults on Sherrif Street and Seville Place (part of the Protected Structure Ref.No.130), and structural solutions to avoid unnecessary loss of fabric in the construction and support of proposed new buildings above, their architectural expression within the streetscapes; visual impact assessment of the impact of the scale and massing of the proposed development on the immediate environs and wider historic city; the meaningful use of salvaged materials arising from demolitions within the proposed works; materiality of the proposed development and its contribution to the urban environment.

It is noted that the main works to the former vaulted luggage hall and stores is part of another planning application for office and hotel development on Sherriff Street Lower.

Policy Context

The subject site is within Zone Z5 *'To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity'*.

Protected Structures, National Inventory of Architectural Heritage (NIAH Ministerial recommendations) and Dublin City Industrial Heritage Record (DCIHR) Status

Connolly Station is included in the current Record of Protected Structures Ref. No. 130, listed as *'Connolly Station: all 19th century portions of main railway station complex'*.

The Connolly Station Complex and its ancillary buildings and structures is of architectural, historical, archaeological, artistic, and social categories of special interest as defined in the Architectural Heritage Protection Guidelines for Planning Authorities 2011.

The former Dublin and Drogheda Railway Station is an important part of Ireland's 19th century industrial heritage, and is identified in the DCIHR.

The site is located outside and to the east of the Georgian Core (as illustrated in Fig. 17 DCC Development Plan 2016 – 2022) but is located in the lands between the Royal Canal and the River Liffey, and is in close proximity to the former Gardiner Estate lands developed in the 18th century and the Custom House and Docks and Beresford Place designed by James Gandon in 1781-91 and 1788-93 respectively.

Other adjacent Protected Structures

Other Protected Structures within the broader vicinity of the subject site include Busarus, Aldborough House, terraced buildings on Amiens Street, Preston Street, Seville Place, and the landmark Church of St. Laurence O'Toole and its Convent. A number of terraced houses on the east and west of Seville Place (south of Oriel Street Upper) of Regional and Local Rating are recorded on the NIAH.

The following buildings which are included in the NIAH Survey are either directly adjacent to and/or will be directly impacted by the proposed works:

Connolly Station Train Shed NIAH Reg. No. 50010123 – Regional Rating.

'This train shed is of technological as well as architectural interest. It represents the almost exponential development of the railway system in the mid-nineteenth century, and the requirement for it to marry with the existing transport infrastructure of the city. Train sheds were the functional aspect of railway stations, the public components of which (as in this example) were often built in a classical style to impose a sense of grandeur as well as to appeal to the public as aesthetically-pleasing buildings. Originally facilitating the access of the Dublin & Drogheda Railway to its original terminus at Amiens Street Station (now Connolly), this piece of engineering remains in use today, which is testament to the skill and ingenuity of early railway builders. It also exemplifies the early use of cast-iron in a structural context, both in the external support piers to the central viaduct, which were cast by Courtney, Stephens & Bailey, and the internal supports to the roof. The detailing to the walls, both in recessed red brick panels and yellow brick and sandstone string courses and platbands, provides an aesthetic diversion'.

Former railway (vaulted) warehouse with upper floor removed Reg. Ref. 50010132 – Regional Rating. (Sherrif Street)

'Attached fourteen-bay two-storey railway building, built c.1850, with upper floor removed, lining north side of Sheriff Street Lower. Random coursed squared and snecked calp limestone walls with each bay flanked by tooled limestone piers. Voussoired round arch to each bay with tooled limestone impost moulding, keystone and platband spanning between piers. Vertically-sheeted double-leaf timber doors with iron reinforcements and locks having remnants of multiple-pane steel overlights. Westernmost four bays have red brick walls to partially intact upper level with recessed brick panel and former window opening (now filled-in with concrete). Now in use as customer car park for Connolly Station.

This former railway warehouse typifies the functional yet well-designed construction employed by railway companies throughout the nineteenth century.

The materials and robust style of building has much in common with railway architecture throughout the country where Neo-Classical references are stripped back to the bare minimum. Currently little more than a remnant of a former railway shed, the building serves as a screen to the car park but retains some of its former elegance while enhancing the industrial character of the streetscape as part of the complex of Connolly Station'.

Office NIAH Reg. No. 50060567 – Regional Rating (Oriel House, former CNRI Goods Office)

'A distinctive early twentieth-century office building associated with railway administration, located in a semi-industrial area between Sheriff Street Upper and Oriel Street Lower. The building displays some architectural pretension through the use of classical devices such as stone cornicing and symmetry, which serve to enliven an otherwise functional building. Historical context is reinforced through survival of important setting features, including original cobbles to Sheriff Street, a fine limestone boundary wall to east side, and some good cast-iron railings and gates'.

Vaulted buildings NIAH Reg. No. 50010032 – Regional Rating (Seville Place)

'Attached railway embankment, built c.1850, having recent railway buildings to flat roof. Red brick parapet wall, laid in Flemish bond with red brick pilasters, surmounted by steel railing to south-east of façade, and having rendered parapet wall to north-west of façade. Snecked rusticated limestone walls with limestone platband and coping. Segmental-headed blind arcade to south-east of façade comprising gauged yellow brick voussoirs and moulded cornice supported on rusticated limestone piers, openings blocked by snecked rusticated limestone. Gauged-brick segmental-headed openings to blocking walls having steel doors. Concrete structure to roof.

This is an example of a functional structure which is also aesthetically pleasing, with yellow brick voussoirs providing a textural and visual contrast to the rusticated snecked limestone walls. The space under the arches, formerly perhaps employed as storage space for the railway company, is now occupied by various businesses. The building makes a positive contribution to the streetscape'.

The following buildings included in the NIAH Survey are within the receiving environment of the proposed development:

Connolly Station NIAH Reg. No. 50010119 - National Rating.

'Originally known as Amiens Street Station, this was the terminus of the Dublin & Drogheda Railway, built to the designs of John Macneill and William Deane Butler. Macneill was knighted on the platform here by Earl de Gray in 1844. The train shed was completed and the railway was operational prior to the completion of the elaborate Italianate façade. The use of Neo-Classical architecture was common in railway architecture and was a device employed to inspire confidence in the new technology, elevated the system to the status of existing civic infrastructure. Still in its original use, the building forms part of an impressive collection of railway structures. Although the interior has been completely lost the building makes a strong impression on the streetscape while handsomely terminating the east vista along Talbot Street'.

Irish Rail Head Office NIAH Reg. Ref. 50010118 - Regional Rating.

'This Italianate railway building was built after the amalgamation of the Dublin & Drogheda Railway with the Dublin & Belfast Junction Railway in 1876. The campanile of this building

echoes that to the centre of Connolly Station, creating a common theme between the two railway structures. Red sandstone detailing is employed effectively to enliven the red brick façade, with cornices, string courses, window surrounds, a rusticated basement and quoins providing an array of textures and decoration.

In the more recent extension, added in 1884 by Mills, Victorian polychromatic brick is used to good effect, reflecting recent developments in brick production technology. The interior of the building is largely intact, including joinery, elaborate cast-iron balustrades, encaustic tiled floors and blind arcades. As intended, the grandeur of this building makes a strong impression on the streetscape and is further contextualised by its association with the adjacent railway complex’.

Connolly Station (Extension) NIAH Reg. Ref. 50011009 – Regional Rating.

‘This addition to Connolly Station was built by W.H. Mills as a terminus of the City of Dublin Junction Railway in 1891, and originally included offices, booking and parcels offices, cloakroom, waiting rooms and lavatories, essentially comprising a self-contained station building. The CDJR was constructed to connect the Great Northern Railway with the Dublin Wicklow & Wexford Railway, in order to complete the Royal Mail route and speed up the movement of mail from the UK. This modest terminus is considerably more restrained in its form than the more elaborate main station, although much of the same fabric, including cast-iron fluted columns and lattice spandrels, and brick walls, is employed. Its subtle design is enlivened by cast-iron work and a stepped façade, while timber sash windows are retained throughout. Often overlooked as a component part of Connolly Station, this building makes an important contribution to the infrastructural and architectural heritage of the country’.

Tentative List - World Heritage Site

In March 2010, the Built Heritage & Architectural Policy Section of the Department of the Environment, Heritage and Local Government proposed the addition of The Historic City of Dublin to the UNESCO World Heritage Site, comprising the Georgian City Expansion 1714 - 1830 and its grand civic buildings and public spaces, residences with plain brick exteriors, institutional buildings, infrastructure and city plan, in addition to the city’s extraordinary contribution to World Literature.

It is the Policy of Dublin City Council:

CHC13: To support and pursue a World Heritage nomination for the Historic City of Dublin, in partnership with the Department of Arts, Heritage, Regional, Rural and Gaeltacht and other stakeholders’. *now referred to as the Department of Culture Heritage and the Gaeltacht (DCHG)*

Building heights

Dublin City Council Development Plan 2016 – 2022 16.7.2 Fig. 39 identifies Connolly as an area suitable for High Rise Development (50m+). 50m is equivalent to 16 storeys residential or 12 storeys commercial. Block C1 is 22-20 storeys high. The proposed site development also reflects the objectives set out within the Department of Housing, Planning and Local Government *Urban Development and Building Height Guidelines for Planning Authorities December 2018*.

Dublin City Council Development Plan 2016 – 2022

Chapter 4 – Shape and Structure of the City

'It is the policy of Dublin City Council SC7: To protect and enhance important views and view corridors into, out of and within the city, and to protect existing landmarks and their prominence'.

'It is the policy of Dublin City Council: SC13: 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 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'.

Chapter 11 Built Heritage and Culture states *'the built heritage contributes significantly to the city's identity, to the collective memory of its communities and to the richness and diversity of its urban fabric. The street pattern, local architectural features, the form of buildings and spaces, civic buildings within set pieces of urban design.....all contribute to the city's character, identity and authenticity, and together form a key social, cultural and economic asset for the development of the city'.*

It is the policy of Dublin City Council:

CHC1: To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.

CHC2: To ensure that the special interest of protected structures is protected. Development will conserve and enhance Protected Structures and their curtilage and will:

- a) protect or, where appropriate, restore form, features and fabric which contribute to the special interest...*
- d) Not cause harm to the curtilage of the structure; therefore the design, form, scale, height, proportions, siting and materials of new development should relate to and complement the special character of the protected structure...*

Industrial Heritage

In recognition of the lack of an Industrial Heritage Charter, ICOMOS (the International Committee on Monuments and Sites) working with TICCIH (the International Committee for the Conservation of the Industrial Heritage), developed principles of best-practice for the conservation of industrial heritage.

The adoption of the Dublin Principles for the Conservation of Industrial Heritage Sites, Structures, Areas and Landscapes by ICOMOS International at their General Assembly in Paris in December 2011 was a major step in the recognition of the significance of industrial heritage, and the need for its conservation, protection and enhancement.

Dublin City Council's Development Plan 2016 – 2022 Objective C010 (6) *To have regard to the city's industrial heritage and Dublin City Industrial Heritage Record (DCIHR) in the preparation of Local Area Plans (LAPs) and the assessment of planning applications.....*

Objective 14 To implement and promote The Dublin Principles (ICOMOS,2011) as a guiding principle to assist in the documentation, protection, conservation and appreciation of industrial heritage as part of the heritage of Dublin and Ireland.

The following buildings/structures are included in the DCHIR in relation to Connolly Station: 18 07 096 Railway Station; 18 08 014 Railway Viaduct; 18 08 015 Amiens Street Terminus footbridge, carriage shed, station; 18 08 016, 18 08 017, 18 08 018 Goods Sheds; 18 08 019 Engine Shed; 18 08 020/18 08 037 Railway Bridge.

Relevant Planning History

Planning Permission was granted by Dublin City Council in May 2012 for a mixed use development with blocks ranging in height from 4 – 7 storeys - Planning File Ref. No. 2863/11.

Description of the Works

Large scale development of former CIE lands comprising the construction of built-to-rent residential units in eight apartment blocks with commercial and community facilities under an SHD application, ranging in height from four storeys to twenty three storeys.

The works propose the demolition of a number of twentieth century buildings of no architectural heritage interest, parts of the protected boundary wall to the subject site and Oriel House, a former two-storey office building (included in the NIAH Regional Rating) on the prominent triangular site at the junction of Sherrif Street and Oriel Street. It is also proposed to temporarily take down the stone boundary wall onto Oriel Hall, and reconstruct it in exactly the same place and presentation, as part of the construction of the new vehicular ramp to the basement carpark. Construction of new entrance into the scheme from Seville Place adjacent to existing buildings that are adjoining but outside the subject site.

The existing vaulted luggage hall and storage vaults on Sherriff Street will be retained, refurbished and incorporated into the proposed works. The SHD scheme will incorporate a 'high-line' garden as well as landscaped publicly accessible landscaped external areas.

A separate standard planning application will be submitted for the construction of two new multi-storey office blocks on Sheriff Street and a new hotel in the location of the demolished Oriel House, which will incorporate the former vaulted luggage store and vaults on Sherriff Street and include refurbishment and interventions to facilitate the new buildings above.

Only the impacts of the SHD application are considered in this report unless particular items are noted within the documentation submitted. The construction of new buildings above the former luggage store vaults and workshop building are not part of this application.

Assessment and Conclusion

The proposed regeneration of the lands adjacent to Connolly Station to provide residential accommodation and increased connectivity within the surrounding community is welcome in principle and will reanimate some of the disused elements of this large site.

Significance

Although it was preceded by the Dublin & Kingstown Railway which was opened in 1834, Connolly Railway Station/Amiens Street Station, serving the former the Drogheda and Dublin Railway is one of the most important 19th century railway stations within the city, signifying the expansion of the railways throughout the country. The main building containing booking halls and offices was designed by Sir John Macneill and William Deane Butler in 1844 – 6, and was extended in 1884 by William Hemmingway Mills. Its triumphal arch-cum-campanile closes the vista along Talbot Street.

The Dublin & Drogheda Railway amalgamated with the Dublin and Belfast Junction Railway and became known as the Great Northern Railway (GNR). In addition to being included in the Record of Protected Structures and in the National Inventory of Architectural Heritage (NIAH), the Railway Complex is also included in the Dublin City Industrial Heritage Record Survey (DCIHR). The surviving principle buildings, train shed, bridges and ancillary vaults and boundary wall are all significant components of the surviving railway complex and contribute to the architectural heritage of the surrounding streetscapes and wider city.

Demolitions, alterations and construction impacts

The proposed demolition of parts of the boundary wall of Connolly Station (Protected Structure) and Oriel House are regrettable in architectural conservation terms because of the loss of historic architectural fabric and the erosion of historic architectural character and streetscape.

Whilst I acknowledge that Oriel House is a relatively modest building and has been the subject of unsympathetic internal modifications and the replacement of its original windows, it still retains its form and selected carefully detailed features, has been included in the NIAH and is part of the surviving architectural heritage of this area of the city. I note the significance of the prominent triangular site and its potential as a landmark focus for the proposed hotel within the new overall development. Its loss should be mitigated by its careful recording, and salvage of all sound materials for use within the subject site.

The demolition of parts of the stone boundary wall to the Connolly Railway Complex arises from the desire to introduce connectivity, accessibility and legibility of the proposed new residential development. The boundary wall is an important part of the railway complex and contributes to the architectural character of the enclosure. Whilst it is recognised that it will be necessary to create openings in the wall to facilitate entrances into the scheme and connectivity, the loss of material should be mitigated by its careful recording and salvage of all sound materials for use within the subject site.

Whilst it is recognised that the construction methods and details of the vaulted former luggage store and other vaulted areas within the complex are relatively ordinary in terms of their technical innovation, these survivors are an extremely important and significant part of the Connolly Railway Complex and shall be retained in a holistic and authentic manner.

Height, scale, massing

The impact of this development by virtue of its height, scale, bulk and massing will have a profound impact on its immediate environs, and its presence will be significant and apparent on the Dublin skyline. This is clearly illustrated in the architect's contextual elevations and selected photomontage views.

The proposed scheme ranging in height between five and twenty two storeys in height is substantially larger than the four–seven storey proposals that were the subject of the previously approved scheme for this site (2863/11).

Impact on Key Views

The impact on the skyline is illustrated particularly in Views 04 and 05 where the campanile of Connolly Station is no longer the prominent feature at the end of the vista along Talbot Street, but stands against the backdrop of the new buildings.

Remarkably, when viewed from south of the River Liffey, the visual impact of the proposed development on the Custom House is minimal. Similarly, the development is not visible from Amiens Street opposite the Connolly Luas Stop in View 19. The building group begins to appear in View 08 behind the CHQ (Protected Structure).

The proposed development appears to the rear of St. Laurence O'Toole Church in View 9, but the steeple remains the higher form when viewed from this location (Spencer Dock, near Mayor Street Upper). The presence of the new development is very apparent as a large mass in View 10 in the context of the spire of St. Laurence O'Toole Church, and the top of Liberty Hall seen at a lower level in the distance, and from the Zone 1 (to protect, provide and improve residential amenities) terraced single storey and two storey dwellings on Coburg Street in View 22, Seville Place approaching Oriel Street Junction View 24, Oriel Street Upper View 25, Commons Street View 26 and Sherriff Street Upper View 27. The development is clearly visible above the streetscape in View 02 – Portland Row/North Circular Road, View 03 – Junction of North Strand/Amiens Street & Saville Place, and above the railway bridge on the junction between Amiens Street and Sherriff Street Lower in View 20, Amiens Street West in View 21. Block C is visible behind the spire of St. Laurence's Church in View 23 from the Junction of Seville Place and Guild Street.

I have not noted any view demonstrating the impact on the residences located on Oriel Hall. The development is not visible from O'Connell Bridge View 17 and is partially visible from George's Dock in View 18.

I note the photomontages provided in Appendix D of the Architectural Heritage Assessment Report which demonstrates that the proposed development has no visual impact on historic views when viewed from O'Connell Street, Hugh Lane Gallery-Parnell Square, Henrietta Street, St. Stephen's Green, Merrion Row, Mount Street Upper, Front Square-Trinity College, College Green, Nassau Street, Mountjoy Square, Buckingham Street, and The Custom House. The presence of the proposed development will be significant at the end of Talbot Street behind the campanile of the station building.

Recommendation

See comments noted below.

Conclusion

I have reviewed the above planning application file and note the following for **COMMENT ONLY**

Recommendation

<input type="checkbox"/>	Request for additional information
<input type="checkbox"/>	Grant of permission
<input type="checkbox"/>	Refusal
<input checked="" type="checkbox"/>	Comment only

I make the following recommendations:

A Grade 1 Conservation Architect or equivalent Conservation Consultant shall be appointed to guide the recording, fabric survey, investigative works, temporary remedial works, taking down and reconstruction of boundary wall, new junctions with historic fabric, protection of historic fabric during demolition and construction process, and conservation repairs to the historic fabric, to safeguard the architectural heritage and designed interventions and conservation repairs.

Where historic fabric is to be altered or removed, the structures are to be recorded in accordance with the Heritage Council's policy for recording industrial archaeology, a permanent record of which shall be provided to the Local Authority and the Irish Architectural Archive.

The following information should be provided for the written agreement of the Local Authority:

Detailed architect's and structural engineer's sectional drawings (1:50, 1:20), including details of underpinning and retaining walls should be provided for all key interfaces/junctions between the proposed works and the existing elements of the Connolly Station Protected Structure that will be affected by the construction of the new basement and vehicular ramp, new entrance from Seville Place, and other parts of the buildings.

Detailed methodology shall be provided for the temporary dismantling and reconstruction of the boundary wall onto Oriel Hall.

A photomontage view shall be provided to demonstrate the impact of the proposed development on the residences located on Oriel Hall.

Detailed methodology shall be provided for the removal of part of the boundary wall onto Oriel Street Upper. I would prefer that the proposed connection from Oriel Street into the new street is formed by a series of contemporary openings within the wall fabric, thus retaining more of the protected structure than is currently indicated in the drawings and View 25. The openings may be constructed in a contemporary manner framed by steelwork, but ensuring retention of more of the fabric than is currently proposed, and connecting into the wall that will be reconstructed onto Oriel Hall.

Detailed schedule to be prepared of all salvaged material, and confirmation of where this fabric will be incorporated into the proposed development works.

Existing vaults

Whilst it is noted that minimal works will be executed as part of this application to the historic protected vaults on Sherriff Street, the amount of truncated walling proposed for removal from above the arched openings shall be determined by the retention of all of the historic vault construction, particularly at the head of the vault.

For example, I refer to a section through Vault 9 by O'Connor Sutton Cronin Structural Engineers (included in Section 4.4 in the Architectural Heritage Assessment Report) which indicates 2m depth of existing fabric above the centre of that particular vault – this may indeed include extraneous material over and above the historic vault material. In all such cases, the historic fabric that is intrinsic to the structure of all historic vaults on the site shall be retained.

The indicative sections included in the Masterplan Document (I acknowledge this document is submitted For Information Only) includes contradictory sections through the former luggage vaults: on page 89 only a thin concrete slab is indicated – and would suggest that the historic head of the vault is removed (this would not be acceptable), on page 91, the section indicates the vault fabric below the new slab is retained. NB: the historic vault structure shall be retained in full. The indicative structural columns supporting the new structure above the historic vaults will be subject to agreement of the detailed design, with the objective of minimal intervention to or loss of the historic fabric.

Mary McDonald, BArch MRIAI MUBC

Senior Executive Architectural Conservation Officer (Acting)
Archaeology, Conservation & Heritage
Grade 1 Conservation Architect
BArch FRIAI MUBC

cc

- X** Planning Officer (Email)
- X** Conservation Section (File / Hardcopy)

ENGINEERING DEPARTMENT – DRAINAGE DIVISION

Our ref: - GK/dd

27/11/2019

Application Number SHD0024/19

Proposal

Planning and Development (Housing) and Residential Tenancies Act 2016

Planning and Development (Strategic Housing Development) Regulations 2017

Notice of Strategic Housing Development Application to An Bord Pleanála

We, Oxley Holdings Limited, intend to apply to An Bord Pleanála for permission for a strategic housing development at this site at the rear of Connolly Station, Sheriff Street Lower, Dublin 1, D01 V6V6. The subject site encompasses an area of 2.88 hectares.

The development will consist of:

- i. The demolition of 4 no. structures with a combined gross floor area of 3,028sq.m;
- ii. The construction of 741 no. Build to Rent (BTR) residential units in 8 no. apartment blocks ranging in height from 4 storeys to 23 storeys with lower height buildings located adjacent to the northeast and east site boundaries, with a cumulative gross floor area of 68,535sq.m comprising:
 - a. Block B1 (maximum building height 54.917m, total gross internal floor area 11,260sq.m, Apartment Mix: Studio: 25, 1-bed: 37, 2-bed: 51);
 - b. Block B2 (maximum building height 54.917m, total gross internal floor area 10,831sq.m, Apartment Mix: Studio: 20, 1-bed: 35, 2-bed: 51);
 - c. Block B3 (maximum building height 51.767m, total gross internal floor area 9,766sq.m, Apartment Mix: Studio: 22, 1-bed: 60, 2-bed: 27, 3-bed: 1);
 - d. Block C1 (maximum building height 79.450m, total gross internal floor area 12,705sq.m, Apartment Mix: Studio: 84, 1-bed: 40, 2-bed: 41);
 - e. Block C2 (maximum building height 39.615m, total gross internal floor area 4,890sq.m, Apartment Mix: Studio: 9, 1-bed: 33, 2-bed: 3, 3-bed: 4);
 - f. Block C3 (maximum building height 39.650m, total gross internal floor area 6,775sq.m, Apartment Mix: Studio: 40, 1-bed: 18, 2-bed: 23);
 - g. Block D1 (maximum building height 53.392m, total gross internal floor area 8,418sq.m, Apartment Mix: Studio: 10, 1-bed: 25, 2-bed: 44, 3-bed: 1);
 - h. Block D2 (maximum building height 30.950m, total gross internal floor area 3,890sq.m, Apartment Mix: Studio: 18, 1-bed: 8, 2-bed: 11);
- iii. Residential support amenities including 1 no. gym, a resident's lounge, work areas, meeting rooms, dining rooms, recreational areas with a combined GFA of 1,444sq.m:

- iv. Change of use from club house to pedestrian passageway of the existing vault (137sq.m GFA) fronting Seville Place, a Protected Structure (RPS No. 130);
- v. A basement of 7,253.4sq.m with a new vehicular access from Oriel Street Upper incorporating resident's car parking (58 no. spaces), residents cycle parking (640 no. spaces) 7 no. plant rooms (combined 2,228sq.m), waste management facilities (393sq.m)
- vi. 766 no. covered cycle parking spaces for residents and visitors, concierge office (233sq.m) and waste management facilities (126sq.m);
- vii. 'Other Uses' including 10 no. units providing retail, commercial, and community use with a combined GFA of 3,142sq.m;
- viii. A total of 18,562sq.m of hard and soft landscaping comprising a c.2,000sq.m public plaza and other public/communal and private open space located throughout the development;
- ix. A service and emergency vehicle only access ramp from Oriel Street Upper site entrance to serve CIE's transport needs at Connolly Station;
- x. Enabling works of a non-material nature to safeguard the existing vaults (Protected Structures - RPS No. 130) that form part of the subject site fronting Sheriff Street Lower, Oriel Street Upper, and Seville Place during the construction phase;
- xi. All associated ancillary development works including drainage, 6 no. electricity substations, pedestrian access; and
- xii. Works to the masonry wall fronting Oriel Street and the Vaults fronting Seville Place (both a Protected Structure) consisting of the creation of a new vehicular and pedestrian entrance.

The application contains a statement setting out how the proposal is consistent with the objectives of the Dublin City Development Plan 2016-2022.

An Environmental Impact Assessment Report (EIAR) has been prepared in respect of the proposed development. The application together with the Environmental Impact Assessment Report (EIAR) may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, during public opening hours at the offices of An Bord Pleanála and Dublin City Council. The application may also be inspected online at the following website set up by the applicant:

<https://theconnollyquartershd1.ie/>

Any person may, within the period of 5 weeks beginning on the date of receipt by An Bord Pleanála of the application and on payment of the prescribed fee of €20 (except for certain prescribed bodies), make a submission

or observation in writing to An Bord Pleanála, 64 Marlborough Street, Dublin 1, relating to the implications of the proposed development, if carried out, for proper planning and sustainable development in the area or areas concerned, and the likely effects on the environment or the likely effects on a European site, as the case may be, of the proposed development, if carried out. Submissions or observations duly made will be considered by An Bord Pleanála in making a decision on the application. Such submissions or observations must also include the following information:

- (a) the name of the person, authority or body making the submission or observations, the name of the person, if any, acting on behalf of that person, authority or body, and the address to which any correspondence relating to the application should be sent,
- (b) the subject matter of the submission or observations, and
- (c) the reasons, considerations and arguments on which the submission or observations is or are based.

An Bord Pleanála may grant permission for the strategic housing development as proposed, or may grant permission subject to such modifications as it specifies in its decision, or may grant permission in part only, with or without any other modifications it may specify in its decision, or may refuse to grant permission for the proposed development. An Bord Pleanála may attach to a grant of permission such conditions as it considers appropriate.

Any enquiries relating to the application process should be directed to the Strategic Housing Development Section of An Bord Pleanála (Tel. 01-8588100). A person may question the validity of a decision of An Bord Pleanála by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts (S.I.No. 15 of 1986), in accordance with sections 50 and 50A of the Planning and Development Act 2000 (No. 30 of 2000), as amended. Practical information on the review mechanism can be found in the Judicial Review Notice on the An Bord Pleanála's website: www.pleanala.ie or on the Citizens Information Service website: www.citizensinformation.ie.

Location	Lands to the rear of Connolly Station, Sheriff Street Lower, Dublin 1
Applicant	Mr. Ching Chiat Kwong, Oxley Holdings Limited North Wall Quay, Dublin 1
Date Lodged	16-Oct-2019
Application Type	Strategic Housing Development
Agent	Jim Keogan, McCutcheon Halley Planning Consultants Kreston House, Arran Court, Arran Quay, Dublin 7
Planner	Stephanie Farrington

**Drainage Division, Engineering Department-
Report to Dublin Planning Officer**

-There is no objection to this development, subject to the developer complying with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (available from www.dublincity.ie Forms and Downloads).

-The drainage for the proposed development shall be designed on a completely separate foul and surface water system with a combined final connection discharging into Irish Water's combined sewer network. Dead leg for future surface water connection shall be provided.

-Records of public surface water sewers are indicative and must be verified on site.

-All surface water discharge from this development must be attenuated to two litres per second per hectare in accordance Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.

-An appropriate petrol interceptor shall be installed on the internal drain from the car park. Please refer to section 20 of the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.

-The development shall incorporate Sustainable Drainage Systems in the management of surface water as outlined in the Engineering Services Report by OCSC and associated drawings.

-Flood mitigation measures detailed in the submitted Site Specific Flood Risk Assessment by OCSC Consulting Engineers shall be implemented in full.

-Permanent discharge of groundwater to the drainage network is not permitted.

-Discharge of groundwater to the public drainage network may be permitted during construction subject to a trade effluent discharge license being obtained from the relevant sanitary authority as required by the Local Government (Water Pollution) Acts, 1977 and 1990.

-To minimise the risk of basement flooding, all internal basement drainage must be lifted, via pumping, to a maximum depth of 1.5 metres below ground level before being discharged by gravity from the site to the public sewer.

-The outfall Surface Water manhole from this development must be constructed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.

-All private drainage such as, downpipes, gullies, manholes, armstrong junctions, etc. are to be located within the final site boundary. Private drains should not pass through property they do not serve.

For Executive Manager (Engineering)

Date

DCC Archaeology Section Report

Re: SHD0024/19; Lands to the rear of Connolly Station, Sheriff Street Lower, Dublin 1

18.11.2019

It is noted that the proposed development is located 100m east of the Zone of Archaeological Constraint for the Recorded Monument DU018-020 (Dublin City), which is listed on the Record of Monuments and Places (RMP) and is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1994.

The subject site is located on land reclaimed for industrial use from the 18th century onwards, which is characteristic of the George's Dock and Spencer's Dock area located to the south and southeast of the proposed site. The Dublin City Industrial Heritage Record lists three mid- 19th-century good sheds located within the subject site (Ref. 180801801, 180801701 and 180801601), two of which are extant. The subsurface remains of other features of industrial heritage interest may survive within the subject site.

The proposed site is one of archaeological potential due to the proximity of the River Liffey and the estuarine levels that underlie the site, which will be impacted upon by the basement level of the proposed development. Prehistoric remains have been recorded in estuarine silt layers elsewhere on the north side of the river. This has been illustrated by the discovery of Mesolithic fish traps during the development of the Spencer Dock area, c. 500m to the southeast of the proposed development area (McQuade 2008, Licence Ref.: 03E0654). Other marine archaeological features, such as shipwrecks, may also survive within the estuarine deposits that underlie the site.

A chapter assessing the potential impact of the proposed development on possible subsurface archaeological features/deposits was included in the EIAR. This office concurs with the suggested mitigation of archaeological monitoring outlined in this report.

Dr Niall Colfer

Dr Ruth Johnson

Assistant City Archaeologist

PhD, MIAI

City Archaeologist

PhD, FSA, MIAI

Air Quality Monitoring & Noise Control Unit
Block 3, Floor 1,
Civic Offices
Dublin 8



Dublin City Council
Comhairle Cathrach Bhaile Átha Cliath

MEMO

To: Planning Decisions

Planning Department

Block 4, Floor 3

From: Róisín Ní Chlaonadh

Environmental Health Officer

Date: 29th November 2019

RE: Planning Application SHD0024/19 – The Connolly Quarter

The compliance details submitted are not satisfactory with the requirements of this unit.

The Noise management measures are not satisfactory during the operational phase. Consider greater management plans for those dwellings situated closest to railway lines. While double glazed windows may be satisfactory, triple glazed is advised to mitigate the nuisance likely to arise from railway noise

Róisín Ní Chlaonadh
Environmental Health Officer

Waste Management
Services
Block B, Floor 2, Blackhall
Walk
Smithfield
Dublin 7

Re: SHD0024/19

Lands to the rear of Connolly
Station, Sheriff Street Lower

1. A full list of up to date authorised waste collection permit NWCPD numbers and if sub-contractors are to be used please include permit details.
2. Please confirm destination facilities that authorised waste collection holders intend to use.
3. Please provide letters on headed paper signed by a relevant competent person from the facilities confirming acceptance of material and tonnages agreed specifically referencing the site.
4. Please provide a more detailed response in relation to quantities.
5. Please ensure and confirm that waste dockets used are specific to the authorised waste collector that collected the waste load
6. Please furnish contact details for the appointed site manager.
7. Please be aware that crushing concrete onsite will need a waste facility permit and so an application will be necessary for the carrying out of this activity. If waste facility permit is required please see condition 7b.

7b. Please acknowledge and confirm that material crushed onsite will be disposed of off-site at an authorised facility e.g. Licenced/Permitted

Note: Crushed material from a waste recovery operation is not appropriate for the Article
27 Notification procedure

8. Please complete laboratory testing of soil onsite and provide Haz. Waste Online and laboratory results.
9. Please complete an invasive plant species survey prior to development and if found to be present provisions on how this will be dealt with e.g. treatment etc.

10. Copy of an asbestos survey carried out prior to development and if found to be present provisions on how this will be dealt with e.g. waste collection, disposal etc. and professional indemnity insurance cover page

11. Waste logs to be available in up to date digital formats for inspection.

Kind regards,



Philip Caird

Date:

27/11/2019

Waste Regulations Technical Officer

To: Stephanie Farrington, Senior Executive Planner

From: Maryann Harris, Senior Executive Parks Superintendent

Re: Comments on SHD application for "Connolly Quarter", rear of Connolly Station, Sheriff Street Lower, Dublin 1

Date: 06/12/19

We note that the Statement of Planning Consistency with the City Development Plan makes no reference to any proposed measures for biodiversity or climate change. As this application has been submitted after the Government's declaration of a national emergency for biodiversity and climate change, and as the City Council declared a climate emergency, we would have expected policies and objectives for both to have been considered in the Statement. The design intention is stated as: "Connolly Quarter has been designed to embrace the juxtaposition between regeneration of the historic arches and busy transport hub, to form a new landmark city destination with a contemporary urban identity." The contemporary city of Dublin is striving to be a sustainable, green city with many policies and objectives in the City Development Plan for biodiversity and climate change adaptation. The scheme's landmark location and status should not just be concerning building heights to be meaningful to the City's design. The report states that "Connectivity is a fundamental theme and underpins the contribution of this site to place-making, given its urban context and location adjacent to a major public transport corridor" (p. 24). Connectivity of green infrastructure is also a fundamental theme of the Dublin City Development Plan and the proposed development could provide a means to strengthen this. We note the proposed green and brown roofs and that the Landscape Architect's Report includes considerations given to nesting birds and pollination. The provision of any new green space in a locality which is identified in the City Parks Strategy as deficient affords an opportunity to support biodiversity. Therefore, we recommend proposed conditions below as a means to ensure consistency with the City Development Plan.

Appropriate Assessment

The proposed development site was checked for invasive alien species (IAS) on one site visit on 15 November 2018. This is a sub-optimal time for survey as many IAS plant species would be dormant by this stage and it is now more than a year ago. The nature of dispersal of IAS is such that they are opportunistic and it is possible that the site has changed in this regard over the past year. The dereliction aspect of the site also must be taken into consideration. The AA Screening Report states that the entirety of the site is comprised of artificial surfaces and built land (p.8). However, Japanese knotweed has been found growing through walls and artificial services in Dublin City and to occur on other development sites in the docklands area. Therefore, the site should be re-surveyed during the growing season for IAS listed in the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477 of 2011) and, if found, the Appropriate Assessment is to be updated and appropriate control measures taken in accordance with the Dublin City Council Invasive Alien Species Action Plan (2016-2020) and the Dublin City Development Plan.

Proposed condition 1: *The applicant is required to commission a qualified ecologist who is a member of the Chartered Institute of Ecology and Environmental Management (or equivalent) to re-survey the site for invasive alien species designated under the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (2011) during the growth cycle of invasive alien plants to*

verify there are none present. A verification report must be produced prior to commencement of construction to Dublin City Council. If any IAS are present, an IAS Management Plan is also to be provided to Dublin City Council, in accordance with the species-specific guidance for contractors working in the DCC administrative area in the Dublin City Council Invasive Alien Species Action Plan (2016-2020). Implementation of any IAS Management Plan must be monitored and signed off by the project ecologist in agreement with Dublin City Council. No works are to take place until actions of an IAS Management Plan are completed. Depending on the IAS in question, post-construction monitoring may be required to ensure controls have been successfully carried out. Any records of IAS found on the site are to be submitted to Dublin City Council and the National Biodiversity Data Centre (NBDC) using the NBDC standard reporting form to inform future planning and ensure monitoring.

Reason: To prevent the spread of invasive alien species in accordance with EU Regulation 1143/2014, the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477 of 2011) Dublin City Council Invasive Alien Species Action Plan (2016-2020); and to protect biodiversity in accordance with the Dublin City Development Plan and Dublin City Biodiversity Action Plan.

In assessment of cumulative effects, the applicant notes that the proposed development will contribute to the loading of wastewater at a quantity of 340m³/day to the Ringsend Wastewater Treatment Plant, in circumstances where the plant is already well in exceedance of its capacity to treat wastewater inputs. This will further add to the discharge of untreated or partially treated wastewater and sewage effluent to Dublin Bay until the treatment plant is compliant until 2023.

The AA Screening Report states that there is no evidence that pollution through nutrient input is affecting the Conservation Objectives of the South Dublin Bay and River Tolka Estuary SPA. However, there are reasons to believe that the sewage effluent is contributing to further exceedances of the Nitrates Directive for the Liffey Estuary Lower, to declining ecological status of the Bay under the Water Framework Directive and the Habitats Directive in terms of impacts to protected seagrass habitats of the Special Area of Conservation (SAC) of the Bay. I refer to the EPA Guidance on Monitoring under the Water Framework Directive (Table 9.2 Sensitivity of quality elements (and associated metrics) to pressures) which notes that seagrass, a bioindicator of water quality under the EPA monitoring programme, is sensitive to nutrient enrichment (https://www.epa.ie/pubs/reports/water/other/wfd/EPA_water_WFD_monitoring_programme_main_report.pdf).

Ongoing research studies funded by the EPA and Dublin City Council suggest that nutrient enrichment is contributing to alteration the plant communities of the Natura 2000 sites and increased growth of algae at the expense of protected seagrass habitats. These seagrass habitats include plant species which are the key food resource for the protected birds of the Special Protection Areas of the Bay, particularly *Zostera* spp. for light-bellied Brent goose. Loss of these habitats results in protected migratory birds becoming increasingly reliant on inland feeding sites as their traditional marine feeding sites shrink due to seagrass habitat decline. This in turn creates further pressures on other development lands. Further data collection will continue in 2020 in cooperation with ongoing studies by the EPA. However, the Precautionary Principle requires that the control of nutrient enrichment is essential for maintaining the Conservation Interests of the Special Protection Areas and Special Areas for Conservation in Dublin Bay. Sewage effluent outputs to Dublin Bay are clearly contrary to the legally binding Conservation Management Plans for the Natura 2000 sites. Seagrass habitats are also essential for addressing climate change impacts, as they are important globally to sequester carbon and are declining due to impacts by rising sea levels. The cumulative impacts of additional sewage effluent loading prior to 2023 will be to further increase the nutrient enrichment of Dublin Bay.

ElAR Report

Bats

The bat survey is recent (this past summer season) and no bat roosting or feeding sites were found, although commuting over the site was noted. All bat species in Ireland are protected under Annex IV of the EU Habitats Directive and the City Biodiversity Action Plan. The site was not checked during the winter season for hibernating bats. Light spill of the proposed development will increase and the ElAR Appendix – Bat Assessment concludes that negative impacts may arise from lighting without mitigation. Specific recommendations for mitigation measures are provided by the ecological consultant in the ElAR Appendix 6.1.1 and repeated in the ElAR 10.6.1 but it is unclear how these have informed the landscape design from reading the Landscape Strategy Report. The proposed Landscape Strategy includes an artistic lighting feature and it appears that lighting has been given great consideration in terms of artistic and visual effects, but it isn't evident that the ecological sensitivity has been recognised. Similarly, the Architectural Masterplan Architectural Statement discusses lighting design to highlight built heritage without any reference to the ElAR. The objective of the ElAR is to inform the final design proposal and to ensure that environmental impacts are mitigated as much as possible. Greater consistency with the ElAR's recommendations for bats should be demonstrated by elaboration in the design reports – both the Architectural in terms of building fenestration and the Landscape Strategy in terms of the outdoor environment – as to how the design specifically provides these mitigation measures. The requirements are not met simply by submission of a bat survey.

Positive impacts may arise from the increase in green space as part of the proposed development. The Appendix recommends the incorporation of green roofs in the proposed development as a measure to provide for feeding sites for bats and also other species. However, this recommendation has not been acted upon in the proposal. A green roof would also help to reduce surface water run-off from the site. We note the proposals for green and brown roofs and these are a positive impact. However, to increase the potential impact of these for biodiversity, the design needs to avoid fragmentation of planting beds into areas which are too small to be of meaningful ecological function. It is unclear if there has been ecological input into the Landscape Strategy Report. While there are references to a desire to have space for birds to nest, the report does not demonstrate how species found in the locality are taken into consideration in the design. The success of the scheme for bats and other protected species will require greater consideration of ecological factors and requirements of local biodiversity and thus, the input of an ecologist to the Landscape Strategy would be of assistance to the landscape architect.

Proposed condition 2: *Prior to commencement of works to the stone arches, the buildings are to be checked for presence of bats by a licensed bat worker through vault inspection, in accordance with the recommendation of the bat survey (6.1.3). If any bats are present, then the applicant is required to seek a consent license from the NPWS to remove the bats. All works are to be carried out in accordance with NPWS Guidelines (IWM 25). This includes verification of absence of winter hibernation roosts. Note that this is a legal requirement under the Wildlife Acts.*

Reason: To ensure protection of bat species in accordance with the EU Habitats Directive and the Wildlife Acts.

Proposed condition 3: *The applicant shall prepare a Lighting Plan for the proposed development that demonstrates concordance of the architectural and landscape architectural plans with the*

recommended mitigation measures in the EIAR (p. 25, Section 6.1.1) and that has been verified by a qualified ecologist as meeting the mitigation requirements.

Reason: To ensure protection of bat species in accordance with the EU Habitats Directive and the Wildlife Acts. To ensure mitigation is adequate and realised in accordance with the EU Environmental Impact Assessment Directive.

Proposed condition 4: *The applicant shall provide pollinator-friendly planting in proposed communal open space in accordance with the All-Ireland Pollinator Plan and the Dublin City Development Plan and City Biodiversity Action Plan. The planting plan shall be agreed with Dublin City Council Parks and Landscape Services. The recommendations in the Bat Survey in the Appendix of the EIAR (p. 26) are to be fully incorporated into the landscape plan.*

Reason: To ensure provision of feeding resources for bats under the EU Habitats Directive and meet national and local Biodiversity Action Plans.

Proposed condition 5: *The applicant shall provide areas of green roof(s) in accordance with the All-Ireland Pollinator Plan and the Dublin City Development Plan and City Biodiversity Action Plan. The detailed design and maintenance plan shall be prepared with the input of a qualified ecologist and shall be agreed with Dublin City Council Parks and Landscape Services. The recommendations in the Bat Survey in the Appendix of the EIAR (p. 26) are to be fully incorporated into the design. The design of continuous planting areas which incorporate native species is necessary to ensure meaningful areas for wildlife.*

Reason: To ensure provision of feeding resources for bats under the EU Habitats Directive and meet national and local Biodiversity Action Plans. To reduce surface water run-off under the EU Floods and Water Framework Directives in accordance with the City Development Plan.

Birds

Dublin City Council commissioned Birdwatch Ireland to carry out a Roof-nesting Gull Survey under the City Biodiversity Action Plan, which is referred to in the EIAR (10.6.1). This was part of the Dublin City Urban Birds Project and the Birdwatch Ireland Action Plan for Urban and Suburban Birds to monitor the Herring Gull, which is a species of high conservation concern nationally, as noted in the EIAR. The herring gull is protected under the EU Birds Directive and the Wildlife Acts. The bird survey in the EIAR showed that there will likely be construction impacts to nesting herring gulls. The applicant has stated that nesting sites are widely available across the city, but it is our experience that this is not the case and they are being subjected to harassment during nesting and commercial firms are supplying 'scaring' devices to remove the birds during the breeding season.

Proposed condition 6: *Prior to commencement of works, the applicant will ensure the buildings are to be checked for presence of breeding herring gulls by a qualified ecologist. If any breeding birds are present, then the applicant is required to seek a consent license from the NPWS to accommodate the works. The applicant is to ensure that the building roof is to remain suitable for nesting post-construction and cannot include any deterrence measures in its design or construction.*

Reason: To ensure protection under the EU Birds Directive and the City Biodiversity Action Plan.

Although it refers to countryside birds, the report does not state any checks for breeding passerine species (swifts, house martins or swallows) which are present in Dublin City for centuries but experiencing severe population declines internationally and impacted by climate change. Dublin City Council has commissioned Birdwatch Ireland to carry out Swift Surveys with the public under the City Biodiversity Action Plan. This was part of the Dublin City Urban Birds Project and the Birdwatch Ireland Action Plan for Urban and Suburban Birds to monitor the swift, which is declining sharply internationally due to a variety of factors, including climate change. Due to the age and dereliction of the buildings, it is necessary to check for these species and to avoid design measures which could result in entombment of breeding birds. Furthermore, there is a need to provide sites for nesting in the city and modern building materials often preclude this. Possible solutions may include incorporation of 'swift bricks' into normal courses of facades or 'swift boxes' under eaves, or 'swift towers' in courtyards. These need to be installed with reference to specific design requirements for a given passerine species.

Proposed condition 7: *Prior to commencement of works, the applicant will ensure the buildings are to be checked for presence of breeding passerine species by a qualified ecologist. A verification report is to be provided to Dublin City Council to ensure compliance. If any breeding birds are present, then the applicant is required to seek a consent license from the NPWS to accommodate the works. The applicant is to ensure that the building roof is to remain suitable for nesting post-construction, with measures agreed with Dublin City Council, and cannot include any deterrence measures in its design or construction.*

Reason: To ensure protection under the Wildlife Acts and the City Biodiversity Action Plan.

ROADS & TRAFFIC PLANNING DIVISION

29th November 2019

SHD REFERENCE: SHD0024-19

LOCATION: Connolly Station, Sheriff Street Lower, Oriel Street & Seville Place, DUBLIN 1

PROPOSED: Demolition of Existing Structures on site and provision of 741 no. Build to Let Apartments with 1444sq.m. of residential amenities.

FOR: Oxley Holdings Limited

TRANSPORTATION PLANNING DIVISION REPORT

Proposed Development

Planning Permission is sought for the following:

- Demolition of 3,028sq.m. of existing structures
- Provision of 741 no. build to rent apartment units with associated amenity areas
- Residential support amenities with total GFA of 1,444sq.m.
- 3,142sq.m. of retail and community uses in 10 no. units located at ground floor throughout the development;
- Basement floor area incorporating car parking (7,253.4sq.m.) for 58 no. residents car parking spaces
- 640 no. residential bicycle parking spaces at basement level
- 766 Bicycle Parking Spaces for Residents and visitors
- New Vehicular Access from Oriel Street Upper
- Service and Emergency vehicle only access ramp from Oriel Street Upper

It is noted that this application is part of a wider masterplan for the entire development lands which in addition to the above, will provide for:

- 9,229sq.m. Hotel
- c.30,288sq.m. of offices/commercial accommodation
- Separate basement level constructed underneath the hotel
- 45 no. car parking spaces

This secondary planning application will be lodged to DCC at a future date, following the decision of An Bord Pleanála with regard to the Strategic Housing Development application.

Submissions/Observations

A number of submissions have been received in relation to the proposed development. Issues raised of relevance to this division are summarised below:

- Concerns re Traffic Impact and Parking – surrounding area acts as parking lot for businesses in vicinity. Adjoining road network occupied by 8am, delays during rush hour, TIA survey data based on one day which doesn't necessarily provide an accurate picture of area. Difficulty for

residents to find parking, non-provision of parking is a serious oversight. Traffic light at Seville Place/Oriel Place are only pedestrian lights, strain on this intersection for cars turning across from Seville Place into Oriel Street. Proposed access will exacerbate the problem.

- Construction Hours: predefined construction hours should be agreed and adhered to minimise negative impact on surrounding residential area. Traffic impact of construction vehicles.
- Proposed Underground bike parking- provision of 1,406 cycle parking spaces is welcome, questions accessibility of spaces- car parking should be rearranged to facilitate clearer access to cycle parking spaces, bike ramp at 1.9m wide is insufficient for two way bicycle track- should be 2.5m at minimum
- 58 parking spaces for car sharing provision is welcome
- Concerns in relation to the proposed 180 spaces for CIE – construction of these spaces should be considered as part of the proposed development rather than an existing use as the spaces do not currently exist- No clarity of justification is provided in relation to the use of these car parking spaces. No management plan is provided in relation to the spaces
- Existing cycling facilities around the proposed development are substandard – safety issues on adjoining road network identified
- Consideration should be given to connecting cycle lanes on Seville Place to the cycle lane through Connolly Quarter's Square to the underground car parking
- Supports principle of proposed development – represents the consolidation of development at a high density into Dublin City Centre
- Entire masterplan will deliver a quantum and intensity of development that would be deemed appropriate for a site with such a high level of public transport connectivity
- NTA in cooperation with Irish Rail are in the process of developing a project increasing the capacity of Connolly Station in order to cater for increased number of train services being planned as part of the DART Expansion Programme and as further capacity is added to the national and regional rail network
- The NTA are satisfied that the transport requirements of Connolly will be catered for by the proposed development

Pre-application Consultation (ABP304248-19)

The pre-application consultation opinion issued from An Bord Pleanála in June 2019. The Bord considered that a number of issues needed to be addressed in the documents submitted. The issue of relevance to this division is as follows:

Car Parking

Further consideration and/or justification of the documents as they relate to the proposed car parking strategy for the proposed development, having particular regard to the quantum of residential parking proposed, how it is intended that it is assigned and managed and measures proposed to address shared car parking and visitor parking. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

Further specific information was also noted to be submitted with the application. The information relevant to this division is as follows:

- *Relevant consents to carry out works on lands which are not included within the red-line boundary.*
- *A detailed Quality Audit to include Road Safety Audit, Access Audit, Cycle Audit and Walking Audit. A Mobility Management Plan.*

Issues Raised by Transportation Planning Division during Pre-Application Consultation

This division had a number of serious concerns relating to the proposed development based on the submission made for Pre-Application Consultation (ABP304248-19). The issues raised are summarised below:

- Inconsistencies across all reports and technical drawings regarding scale of development proposed, quantum and location of car parking, layout of basement/podium car parks;
- Quantum of car parking proposed to serve the subject site resulting in the creation of a traffic hazard, creation of pedestrian and vehicular conflict due to location of access/egress point for the car parks within a pedestrianised plaza;
- Proactive response to Mobility Management required;
- Carrying out servicing for residential and non-residential uses within the curtilage of the site, subject to a management strategy;
- Audit of wider areas to examine the potential to improve connectivity to the site, particularly for pedestrians, as well as connectivity between the station, Luas and Busáras, including identifying any necessary works to improve these connections outlined e.g. the need for pedestrian crossings or upgraded footpaths;
- Anomalies with regard the quantum and type of cycle parking proposed.

It is noted that a number of the concerns raised by this division during the Pre-Application Consultation have subsequently been reiterated in the formal opinion issued by An Bord Pleanála in June 2019.

Changes between Pre-Application Consultation Application and development as currently Proposed

There have been a number of changes to the proposed development since that submitted for Pre-Application Consultation.

An overview of the main changes relevant to this division are as follows:

Type of Development	Pre-Application Consultation	Current Planning Application	Increase/Decrease
No. Residential Units Proposed	697	741	Increase of 43 residential units
Typology	182x studio units 318x 1 bed units 181 x 2 bed units 16 x 3 bed units All BTR apartments	228 x studio units 256x 1 bed units 251 x2 bed units 6x 3 bed units All BTR apartments	-Increase of 46 in studio units -Decrease by 62 in 1 bed units -Increase of 70 in 2 bed units - Decrease by 10 in 3 bed units
Car Parking Spaces	181 no. residential car parking spaces 9 no. retail car parking spaces 10 no. car club spaces 180 no. spaces for Irish Rail/CIE Total: 380 no. spaces	58 no. car club spaces 135. no spaces for Irish Rail/CIE (with a further 45 no. spaces to be provided in a subsequent S. 34 application for the remaining commercial elements of the site- total 180 no. spaces for CIE/Irish Rail across the plan lands) Total: 238 no. spaces (in this application)	Decrease by 187 no. car parking spaces

<i>Bicycle Parking Spaces</i>	910 bicycle parking spaces 328 visitor bicycle parking spaces Total: 1238 spaces	640. residents cycle spaces 766 residents and visitor cycle spaces Total: 1406 spaces	Increase by 168 no. cycle spaces
<i>Residential Amenities (GFA)</i>	2,590 sq.m.	1,444sq.m.	Decrease of 1146sq.m.
<i>Retail/Commercial Units (GFA)</i>	3,277sq.m. in 9 no. commercial units	3,142sq.m. in 10 no. units	Decrease of 135sq.m.

TPD Comments

It is noted that this division has not had any further consultation or correspondence with the applicant since the SHD Pre-application consultation and tripartite meeting with An Bord Pleanála on the 29th May 2019. Having reviewed all the documentation submitted with this SHD application, the comments of this Division are contained below.

Access & Movement, Car Parking and Traffic Impact

A number of areas of concerns raised by this division have been addressed within the documentation submitted (e.g. cycle parking, quantum of car parking). However, it is considered, that the fundamental principle of how the proposed development will operate in terms of traffic impact and pedestrian and vehicular movements has not been resolved with this application and remains of serious concern to this division.

The reduction in residential car parking and the provision of an on-site car share facility for the residents is acknowledged. While the legal opinion in the Planning Report referencing the rationale with regard to the inclusion/omission of the 180 Irish Rail/CIE car parking provision is noted, the failure to provide details on the operation of the existing car park or its inclusion in the proposed car parking strategy seriously undermines the principle of sustainable integrated land use and transportation development in the City. While it has been stated that this car park is existing and in full operation, its proposed redevelopment of part of the Masterplan and continuation to operate within its current model (i.e. as a commercial commuter car park) would be contrary to City Development Plan policy and not acceptable to this division. While the principle of omitting these car parking spaces from this planning application has been argued in the context of planning procedure from a legal perspective, this cannot be a consideration for this division and the operational impact of the proposed development must be assessed based on all associated traffic generated. The proposed access arrangements for said car park will change from where it is currently accessed off Sherriff Street Lower, and therefore this division must have due consideration for all these changes on the surrounding road network. Therefore the concentration of all traffic into a singular entrance off Oriel Street Upper remains of serious concern to this division, in particular given the omission of key information from the application to allow a thorough assessment of the development.

The Traffic Impact Assessment (TIA), which also forms Chapter 6 of the Environmental Impact Assessment Report (EIAR), has reviewed and analysed the overall Connolly Station redevelopment i.e. the proposed SHD development and the Section 34 application for the hotel and office development. The estimated Trip Generation has increased for the overall development from that presented in the TIA at pre-application consultation stage. At Pre-Application stage, it was estimated that the residential element of the proposed development would have approximately 342 daily arrivals and 373 daily departures. In the current application, the TIA states that the residential element of the proposed development would have an estimated daily arrival of 363 trips with 396 departures; resulting in an estimated increase of an additional 44 daily trips. This information however appears

to conflict given that the proposed development has provided a significantly reduced provision of residential parking and the typology proposed (i.e. car share) and in turn, one would expect a reduction in the estimated daily trips generated. In the context of the overall Masterplan, it has been stated in the TIA that the entire site is expected to generate approximately 2,198 additional trips per day, an increase from the 2,153 additional trips detailed in the Pre-Application TIA. The TIA does note that the cumulative trip generation for the apartments is considerably beyond the proposed parking allocation meaning the estimates are highlighted as being conservative. However, it is noted that the expected AM peak hour (7-8am) would have approximately 101 arrivals and 84 departures, with the PM peak hour (4.15-5.15pm) having approximately 74 arrivals and 117 departures and therefore would not appear to accurately reflect the revised typology of residential car parking proposed for this development i.e. car sharing.

The Car Parking Strategy noted in the TIA states that access to the car park will be restricted to car club vehicles only and a barrier system will be in place at the entrance/exit to facilitate this. A clamping system will be in place throughout the site whereby any cars parked in an unapproved location will be clamped. It is stated that from initial contact with prospective tenants, it will be made clear that there is no private car parking available on site. No reference has been made in the Car Parking Strategy to the car parking spaces that are to be made available to CIE/Irish Rail.

With regards to the 180 car parking spaces (135 of which are provided as part of this SHD application) to be made available to CIE/Irish Rail, the TIA states that the reduced allocation of Irish Rail car parking will continue to be a trip generator but re-routed through the new access on Oriel Street. The associated revised trip patterns of the reduced Irish Rail car parking have been developed on a pro-rata basis using the traffic survey data from the existing car park entrance. All of the information contained within the TIA in the context of traffic surveys (October 2018), trip generation patterns and junction analysis remains unchanged from that submitted in the Pre-Application TIA. This division would therefore have concerns with regards to the validity of the data taking into consideration the changes between the Pre-Application Consultation and the proposed development in this application i.e. increase in residential units, reduction in car parking spaces and changes to car parking typology (car share) proposed.

Notwithstanding the information contained in the TIA and the concerns noted regarding the data and information provided, one of the main concerns to this division is with regards to the proposed access ramp/road serving the residential car parking, Irish Rail/CIE car parking and the fire-tender access road. It should be noted that the drawings and documentation submitted are inadequate and unclear in relation to the operation of the access roads/ramps and therefore this division has had to make assumptions on the apparent intended operation of these roads due to the inadequacy of the drawings and absence of any design rationale for said access ramps/road.

The access/egress arrangements appear to have altered from those proposed at Pre-application Consultation stage. At pre-application consultation, a two way ramp was proposed to access the basement car park with a two way access ramp to be used as fire tender access. In the current application, the fire tender access road has been maintained as a two way ramp, but the access to the basement car parking has been indicated a single lane ramp, with a two way cycle track adjacent to the single lane. The single lane access/egress to the basement car parking spaces is shown to be managed via a traffic light shuttle system. The architectural drawings for the scheme show the two way ramp as fire tender access only. However, the OCSC engineering drawings show this 'fire tender only' two way ramp as serving the third floor CIE car parking spaces while not actually providing a detailed layout from route of ramp into car park. It is also noted that the fire tender auto-track drawings show required turning movements within the area of the third floor car park. In order to

facilitate a proper assessment of the overall access arrangements including those for fire tender, the third floor car park and layout should have been included in the development.

Regarding the proposed operation of the access/egress to the basement car park, a traffic light shuttle system operates on the basis of priority entry/exit controlled by sensors. The main disadvantage associated with operating a traffic light shuttle system in a car park is that it can lead to queueing. While queueing to exit at the top level is contained within the car park and therefore would not appear to impact on the road network, the potential for cars queueing at ground level waiting to enter is significant. This division would only support the use of a traffic shuttle system in a development with minimal car parking i.e. 10-15 cars in a quiet location where the potential for queueing would be reduced given the volume of cars that may be entering/exiting at any one time. The use of a shuttle system to serve 58 no. car parking spaces would be unacceptable to this division, having regard to the potential for queueing across the shared public realm plaza onto Oriel Street Upper, affecting the junction at Seville Place and in turn potentially the junctions at Sheriff Street Lower and Amiens Street.

The proposed development has indicated the provision of a two way cycle track extending from the entrance at Oriel Street Upper, across the public realm plaza and into the basement car parking. This two way cycle track has been extended from that previously proposed in Pre-Application Consultation and delineated as an on-ramp cycle track the full length of the access ramp (previously it was not delineated as a segregated route until the start of the basement car park ramp). While it has been noted that the level of car parking provision has been reduced from that proposed at Pre-Application consultation, the concerns of this division still remain with regard to the potential pedestrian and vehicular conflict concentrated at this single vehicular access/egress. The proposed development will be both a through route and a destination for pedestrians. Retail and commercial units are proposed at ground floor levels in blocks within this development where a high level of pedestrian activity would be expected from both visitors to and residents of the development. The introduction of a traffic light shuttle system to serve the basement car park, the maintenance of a commercial car park within the development and the utilisation of this access for service vehicles to use the concealed yard in Block C results in an overconcentration of uses from a single access/egress point, leading to increased potential for pedestrian/cyclist and vehicular conflict.

Furthermore, the Road Safety Audit (RSA) submitted has not evaluated the operation of this ramp access and basement car park and therefore the designer's response to the issues concluded in the RSA relate predominately to works on the surrounding road network, all outside of the applicant's control and therefore outside the red line boundary. The RSA concludes that while the applicant is willing to undertake the design and construction of these works in consultation with the Roads Authority, the applicant is seeking the funding of these works to be fully offset against development contributions levied against the applicant. This is a mechanism that is not supported by Dublin City Council; it is further re-iterated that the applicant has not had any further consultation with this division regarding any works outside of the development site since the issuing of the formal opinion from An Bord Pleanála in June 2019.

Recommendations

The Transport Planning division welcomes the redevelopment of Connolly Station and considers it an opportune site for an integrated land-use and transport development hub. This division considers the location to have the potential to be an exemplar of high density, integrated land use and transportation development in the City and recognises the need to regenerate and redevelop this area of the City. As has been reiterated throughout the pre-application consultation process for this site, this division has no objections to the non-provision of car parking at this location.

Notwithstanding the above, this Division has significant concerns regarding the proposed development. The access/egress arrangements proposed are unacceptable. A single shuttle light controlled ramp to serve 58 car parking spaces will generate extensive queuing through the pedestrian plaza, across a cycle track and fire tender access and on to the adjacent road network, thereby creating unacceptable traffic impact and a traffic hazard. It is considered that a redesign of the access arrangements is required and that this would have a significant impact on the overall design of the scheme. The omission of the 180 car parking spaces from a robust assessment of the development is also unacceptable. The documentation includes serious deficiencies in information, including lack of clarity around the operation and management of the Irish Rail/CIE car parking spaces and their omission from the Car Parking Management Strategy, the failure to have regard to the changes in car parking provision and use in the Traffic Impact Assessment.

This division would, if it were possible, recommend that Further Information be submitted to revise the access arrangements and to include the 180 spaces and assessment of same in the SHD application.

Nicola Conlon
Senior Executive Planner

Edel Kelly
Senior Transportation Officer

MEMO

MEAMRAM



Dublin City Council
Comhairle Cathrach Bhaile Átha Cliath

Housing & Community Services
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Planning & Property Development Department,
Dublin City Council,
Floor 4, Block 3,
Civic Offices,
Wood Quay,
Dublin 8

21st October 2019
Ref: 852

Re: Part V – Lands at Connolly Quarter Development, Sheriff Street Lower, Oriel Street and
Seville Place, Dublin 1.

DCC SHD Application No: SHD0024/19

I refer to your letter and attachments of 17th October 2019 regarding the above.

I have examined the relevant documents in relation to Part V of the Planning and Development Act 2000 (as amended).

McCutcheon Halley Chartered Planning Consultants on behalf of Oxley Holdings Ltd., has previously engaged with the Housing Department in relation to the above development and are aware of the Part V obligations pertaining to this site if permission is granted.

I trust the above is in order.

Kind Regards,

Natasha Satell
Housing Development



Memo

Rannóg Ailtire na Cathrach
Seirbhísí Tithíochta agus Pobal
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Re: SHD Connolly Quarter – City Architects Assessment

From: Ali Grehan

To: Mary Conway, Deirdre O'Reilly, Stephanie Farrington.

Date: 10 Dec 2019

CA file reference: CA001/2019_Connolly SHD

Introduction

The following comprises City Architect Division's comment on the Strategic Housing Development application for the construction of 741 no. Build to Rent residential units together with residential support amenities, retail/commercial uses and all associated infrastructural and site development works at a site to the rear of Connolly Station, Sherriff Street Lower, Dublin 1.

We have assessed the application on the architectural and urban design information submitted including the following documents:

Documents:

- Architectural Drawings
- Masterplan
- Architectural Design Statement
- Housing Quality Audit
- Photomontages
- Engineering Services Report
- Traffic Impact Assessment
- Site Specific Flood Risk Assessment
- Operational Waste Management Report
- Landscape Drawings
- Landscape Design Report
- Appropriate Assessment Screening Report
- Site Lighting Report
- Building Life Cycle Report
- Sustainability and TGD L Report
- Wind: Pedestrian Wind Comfort CFD Report
- Daylight, Sunlight & Overshadowing Report
- Architectural Heritage Assessment



This summary will assess the development under the following headings.

1.0 Design quality

- 1.1 Slenderness Ratio
- 1.2 Massing
- 1.3 Elevations

2.0 Amenity and the Public Realm.

- 2.1 Public Space
- 2.2 Semi-private Amenity Space
- 2.3 Private Amenity space

3.0 Sustainability & Adaptability.

- 3.1 Building Life Cycle Report
- 3.2 Adaptability

4.0 Impacts on the receiving environment.

- 4.1 Environmental Assessment
- 4.2 Overshadowing- neighbourhood

5.0 Visual Assessment

- 5.1 Setting Impact on Dublin's Historic Core
- 5.2 Impact on the Customs House
- 5.3 Impact on the Liffey Campshires.
- 5.4 Comment on Visual Assessment and Photomontages presented

6.0 Conclusion and Recommendations

1.0 DESIGN QUALITY

Overall the height in the proposed development is acceptable, however the bulk massing and intensity of development does not meet the specific qualitative assessment criteria for Tall buildings (over 50 metres) as set out in the Dublin City Development Plan (DCDP).

"Taller buildings (over 50m) are acceptable at locations such as at major public transport hubs, and some SDRAs. For example, the North Lotts and Grand Canal Dock SDZ planning scheme provides for a limited number of tall buildings at Boland's Mills, the Point, Spencer Dock Square and Britain Quay.

In all cases, proposals for taller buildings must respect their context and address the assessment criteria set out in the development standards section, to ensure that taller buildings achieve high standards in relation to design, sustainability, amenity, impacts on the receiving environment, and the protection or framing of important views."
(Extracted from Section 4.5.4.1 of the Dublin City Development Plan.)

This proposal contains five tall buildings, one of which could be categorised as a landmark due to its significant height. The DCDP states:

"When developing landmark high buildings, the planning authority will encourage architectural design competitions and the exploration of different architectural



concepts for sites on which higher buildings are proposed.” (Section 16.7.1, Dublin City Development Plan.)

Although the DCDP does not stipulate a specific criteria for a landmark building in particular, it does encourage design competition for stimulating innovation and quality in the design. This opportunity for broader design has not occurred for this significant development.

Even more stringent evaluation is required for this development as the development presents a cluster of tall buildings with a landmark building at its core. We will now set out our assessment of the tall buildings based on the criteria referred to above.

1.1. Slenderness Ratio

In reference to the Dublin City Development Plan (DCDP) Assessment Criteria for Higher Buildings (Section 16.7.2 of DCDP); a slenderness ratio of 3 to 1 or greater should be aimed for. When the central landmark, Tower C1, is viewed from the north-west or south-east; the building presents a very poor slenderness ratio of 1.8 to 1; which presents a wide profile above the cityscape. The Tower building C1 fails the slenderness ratio design criteria. The remaining ‘Tall buildings’, namely blocks Block B1, B2, B3 and D1, also do not meet the recommended slenderness ratio. From our desktop study the slenderness ratio of Block D1 measures 2 to 1; with the ratio of Block B1, B2 and B3; having a ratio of 1 to 1; which are all of concern as they present a negative effect on the skyline.

1.2 Massing

The bulk massing of the development has impacts on the quality of residential amenity, the public realm and the skyline. The B complex, in particular the intense massing and repetitive form in tight proximity of the each other, poses a significant problem in relation to the impact on the quality of external amenity spaces. Poor results in daylighting are presented in the Daylight, Sunlight and Overshadowing Performance Report. Of the select average daylight factor analysis presented, the internal daylight quality of the apartments present particularly concerning low levels in Block B1, B2, B3, C2 and D1.

In reference to the height strategy noted in the submitted Architects Design Statement; the stepping down of the building mass in context with the surrounding streets, has not been sufficiently demonstrated in verified and contextual architectural drawings. The proposed development does not sufficiently demonstrate a resolve in the relationship to surrounding context and topography to the north and east of the site.

There has been no alternative massing evaluation presented of similar densities levels in an alternative urban form in the documentation. This is of concern considering the scale of the development.

1.3 Elevations

A design principle of articulating three distinct vertical sections (base-middle-top), has been applied to Block C1; however this principle has not been applied to the other tall buildings, i.e. Blocks B1, B2, B3 and D1. This results in a relatively monotonous and repetitive flatness to the latter elevations, with no distinct punctuation at the top of buildings; and reinforces the sense of the buildings being over-scaled relative to the wider environment.



The approach of applying multiple building frontage treatments does little to hide the mass bulk and scale imposed by these blocks. The materials and intricate detailing proposed around window openings add some benefit but will be generally lost when viewed from any distance, due to the sheer scale and mass of the elevations.

The specific materiality of the C1 Tower design appears as a metal façade. There is insufficient information submitted to enable an assessment on this façade, with no product or construction system detailed, or no precedent building suggested as an example for consideration. This raises serious durability and weathering questions such as; how is the cladding system jointed in its modular form; how is the building effectively weather-sealed; what is its ability to wear in sunlight; will it stain, will it cause glare etc.? Given the height of the building; it is unclear how the building will be periodically cleaned and maintained.

2.0 AMENITY AND PUBLIC REALM

A high quality public realm is required in this development as set out in the DCDP.

“SC25: To promote development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture befitting the city’s environment and heritage and its diverse range of locally distinctive neighbourhoods, such that they positively contribute to the city’s built and natural environments. This relates to the design quality of general development across the city, with the aim of achieving excellence in the ordinary, and which includes the creation of new landmarks and public spaces where appropriate.”

We will now assess the design quality of the public space, semi-private amenity and private amenity as presented in this application.

2.1 Public Space

Quality

The main public Open space central to the development is named ‘Connolly Square’, and its inclusion offers potential amenity benefit. However, insufficient detail such as sunlight or daylighting analysis, has been submitted for this ground level concourse. As the Pedestrian Comfort CFD Analysis report indicates; the square falls short of meeting either sitting or standing comfort criteria. In reality this new space will have limited access to daylight and will be overshadowed. An application of this order should provide a more detailed submission; to enable critical evaluation of the public space in justification of its design approach.

Materials

The majority of the space provided is of a hard landscaping nature, with boxed planters providing for trees and low shrubbery. A substantial portion of the area is made up of undercroft to the Highline and vehicular ramping, but no detail on materiality or finish is provided for these areas. No details are presented in relation to signage and branding as required by the DCDP. We note that no lighting scheme is provided for the arched passage from Seville Place.

The provision of mature trees is very welcome, but we note that trees are planted in raised beds over basement, so further information would be beneficial regarding the viability of this proposal. Some seating proposed on concrete surround upstands to greenery but other than this, no further measures are offered to encourage people to linger and interact, making the central space appear more like a transitory space..



Permeability and Passive Surveillance

The scale of this development presents an exceptional opportunity to provide new connections with the wider community and around the Connolly Station area. However, the new routes indicated will need to be actively managed to be made viable and safe; particularly in relation to the connection with Seville Place, however no clarity as to how this will be managed has been submitted. The proposed development shows no gating or enclosure to the development; of which is welcomed and is in keeping with the DCDP. In the absence of a management proposal, it would be a concern that a development such as this may become gated for security reasons and limit the open permeability suggested in the application.

The street engagement onto Oriel Street is limited to high level wall openings at ground level. It would be beneficial that engagement with the street is provided by opening retail units open on to Oriel Street. The vehicular access, ramping and floor levels in relation to the Service Yard and vehicular entry at Oriel Street, do not seem to be fully resolved in the documentation provided.

The masterplan document submitted notes a possible future connection to the rear of Connolly station indicated in, would be beneficial from a city wide perspective. The activation of Sheriff Street Lower proposed in same is beneficial as it animates the street that is currently neglected and under-used, at such a key strategic and central location in the city.

2.2 Semi-Public Amenity

The quality of the shared amenity is particularly important in this development given the majority of the apartments have no private amenity space. However, there are apparent design issues in some of the semi-public amenity spaces as revealed by the applicant in The Environmental Reports submitted.

With regard to daylighting, the 'Daylight, Sunlight and Overshadowing Performance Report' (pg 72) states: *"Three of the fifteen areas would not receive the recommended amount of sunlight due to their positions between blocks"*. The daylighting quality of the podium courtyard of Block B present concerning results, with B2 and B3 courtyards not meeting the minimum threshold for daylighting.

With regard to pedestrian comfort, the 'Pedestrian Comfort Analysis Report' states that poor wind conditions will be experienced: *"The primary reason is the orientation of these podium spaces, which makes them susceptible to wind tunnelling from both the westerly and southerly winds. These are dominant wind directions in Dublin."* It is apparent the courtyards of Block B will be often dark, damp and potentially prone to prevailing winds.

An averaged daylight and sunlight analysis of the combined amenity areas is applied by the applicant to satisfy a minimum threshold of achieving 2 hours of sunlight on the 21st March. It also relies heavily on high-level roof terraces exposed to higher levels of daylight to achieve the averaged result. However, despite this and according to the submission, 32% of the areas do not achieve this minimum standard of daylight.

In general, the outdoor semi-private amenities and scheme in general would seem at odds with the sustainable design aims as set out in DoEHLG 'Quality Housing for Sustainable Communities' guidelines; in particular section '4.4.2 Microclimate'. In discussion with the planners; the removal of the Block B2 entirely was discussed, with the improved positioning



of Block B1 as a possible solution to improve the quality of daylighting in the amenity spaces and the daylight quality within the apartments.

Shared 'Residential Support Facilities, Services and Amenities' are indicated at first floor level of Block C and B. However insufficient detail has been submitted to enable a critical analysis of these spaces; the management of same or if adequate and appropriate allocation to residents has been provided. The external fitness area proposed to the Highline between Block C and D, at the North-west, perimeter, also suffers from poor daylighting, with a substantial portion of the space falling short of the minimum standard for daylighting.

2.3 Private Amenity

The vast majority of apartments are not afforded private balconies. As a compensating measure, residents are to rely on the semi-private amenity spaces. However, as set out above, the amenity of some of these spaces is poor, requiring occupants of poorly lit apartments overlooking dark amenity spaces to use remote amenity space. Many of the single aspect units in Blocks B2, B3 and C3, which overlook the dark amenity spaces, are reported to have very low natural daylighting levels.

3.0 SUSTAINABILITY

The sustainability of the application also warrants an appraisal in accordance with the objectives of the DCDP to which the objective on sustainability states:

"To promote the concept of carbon-neutral sustainable communities throughout the city and to seek to initiate and support carbon neutral demonstration projects in conjunction with local communities." (CC06, Chapter 3, DCDP)

The sustainability appraisal is set out in the following paragraphs:

3.1 Building Life Cycle Report

The submitted Building Life Cycle Report is limited to compliance with the current Building Regulation requirement and falls short of what is understood today as a Building Life Cycle Report. It would be beneficial if a largely residential development of this scale applies additional sustainable building standards such as those set out in the 'The Home Performance Index' or the British Research Establishment (BRE) 'Home Quality Mark', whereby environmental criteria are quantified to determine the quality and future-proofing of the development.

3.2 Adaptability

There is no obvious strategy to provide for the adaptability of units and this is concerning due to the high proportion of studio and one-bedroom units. Section 16.10.1 of the DCDP states; *'Build-to-let schemes for mobile workers should be adaptable for future demographic needs of the city, e.g. by providing for the amalgamation of studios in a change of use scenario.'*

There is no clarity provided in the documentation as to how the applicant intends to meet this standard by providing homes suitable for amalgamation and future adaptability. There is no provision in the development for childcare facilities such as a crèche, or child friendly spaces such as playgrounds; contrary to the objectives set out in the DCDP.

4.0 IMPACT ON THE RECEIVING ENVIRONMENT

This assessment does not include a detailed review of all aspects of the EIAR. However we have reviewed Sections 12, Air Quality and Climate.



4.1 Environmental Impact Assessment Report (EIAR)

The 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018) states:

"In respect of a projects, there are two key aspects to be addressed: - Climate Change mitigation – impact of the project on climate change, primarily through greenhouse emissions (direct and indirect); Climate change adaption – vulnerability of the project to future changes in climate and its capacity to adapt to the impacts of climate change."

However, the Air Quality and Climate section, (in the submitted EIAR) is limited to construction activity stating: *"Construction traffic would be expected to be the dominant source of greenhouse emissions as a result of the development."* (Section 23.5.1)

A more thorough analysis is required to assess the climate impacts.

4.2 Overshadowing - neighbourhood

The report uses the benchmark of a previously approved scheme to justify obvious overshadowing to neighbouring properties. There is a severe impact to the existing neighbouring residential units on Oriel Hall and Oriel Street. The use of the benchmark removes any in depth analysis on the impacts to the neighbouring developments. There is insufficient detail presented to allow for a detailed appraisal of the overshadowing impact.

5.0 VISUAL IMPACT ASSESSMENT

We now review the 'Verified Photomontages for Landscape and Visual Impact Assessment' submitted in the application to assess the impact on the framing and protection of important city views.

5.1 Setting Impact on Dublin's Historic Core

It is envisaged that there will be no impact of the site on nine out of the ten designated priority Architectural Conservation Areas of the city as denoted in the Development Plan. The nearest ACA to the site is the Customs House.

5.2 Impact on the Customs House

From the framed perspective of view 06; the twenty-third storey of the proposed C1 tower only just appears above the IFSC buildings in the foreground. This verified view suggests that from pedestrian eye-level the rest of the proposed development will be concealed behind existing structures and will have no notable impact. As one moves east on City Quay; the proposed development is less affected as the viewers angle of the Customs House becomes more displaced from the site; as depicted in photomontage view 07. As the viewer travels across Butt Bridge; the aerial view above is obscured by the overhead railway bridge.

5.3 Impact on the Liffey Campshires.

In recent times views of the Dublin Convention Centre and the Samuel Beckett Bridge have been used as icons buildings to market the City as a destination. It is noted that the proposed development is likely to be quite visible in the background of these views. In particular; the twenty-three storey tower will now appear in the skyline above, dependent on the perspective used. This has not been illustrated in the presented photomontage views.

5.4 Comment on Visual Assessment and Photomontages presented.

In relation to the views presented; these have been rated for visual impact with commentary provided on the Medium and High Impact views as noted in the Table below.



Table 1.0 of Photomontage views presented

	View Locations	SHD Scheme Impact	Masterplan Impact
1.	Annesley Bridge, North Strand Road	LOW	LOW
2.	Portland Row / North Circular Road	LOW	LOW
3.	Junction of North Strand/Saville Place	MEDIUM	MEDIUM
4.	North Earl Street and O'Connell Street view	MEDIUM	HIGH
5.	Talbot Street and Gardiner Street view	MEDIUM	HIGH
6.	Custom House View – Loopline Bridge	LOW	LOW
7.	George's Quay - opposite Custom House	NO	NO
8.	CHQ - Sean O'Casey bridge	LOW	LOW
9.	Spencer Dock near Mayor Street Upper	MEDIUM	MEDIUM
10.	East Road Bridge, East Wall	HIGH	HIGH
11.	Church Road	LOW	LOW
12.	Alfie Byrne Road	LOW	LOW
13.	East Wall Road at Dublin Port Entrance	LOW	LOW
14.	Sheriff Street Upper Near East Wall Road	LOW	LOW
15.	Point Square / Mayor Street	NO	NO
16.	East Link Bridge	NO	NO
17.	O'Connell Street Bridge	NO	NO
18.	George's Dock	LOW	LOW
19.	Amiens Street opposite Connolly Luas Stop	NO	NO
20.	Amiens Street junction with Sheriff Street	LOW	LOW
21.	Amiens Street West of Site	MEDIUM	MEDIUM
22.	Coburg Place	HIGH	HIGH
23.	Seville Place at Guild Street Junction	LOW	LOW
24.	Seville Place approaching Oriel Street	HIGH	HIGH
25.	Oriel Street Upper	HIGH	HIGH
26.	Common Street	HIGH	HIGH
27.	Sheriff Street Upper	HIGH	HIGH



View 3 Junction of North Strand / Seville Place

The proposed development rises significantly behind the existing residential housing in the foreground. The view shows the three 14/15 storey Block B buildings in succession, with little attempt to step down the massing which appears over-scaled in this view. The poorly designed repetitive window pattern of the three blocks in succession offer little variation in design. From this view the Block C1 Tower slenderness ratio is quite low at approximately 1.8 to 1 and which cause a negative impact on the skyline.

The future proposed office building in the masterplan document further impacts on the skyline in this view, but it will be subject to a separate planning application.

Connolly Station - Views 4 and 5, Talbot Street & North Earl Street.

These views look long in eastward direction from Talbot Street and North Earl Street and offer a view along the four-storey commercial and residential street buildings framing the view of the tower of Connolly station, which is a protected structure. The prominence of the station tower as a destination at the end; becomes diminished with the intensity of the proposed development dominating the skyline behind.

The slenderness ratio view of the Tower from this angle is approximately 2 to 1, which is acceptable however the Block B also poses a significant negative impact on the skyline at this point. There is little attempt to provide any articulation of the façade here, which is poorly designed.

The future proposed office building in the masterplan document further negative impacts on the skyline in this view, but it will be subject to a future planning application.

View 9, Spencer Dock new Mayor Street.

The main feature on the skyline is the spire of the St. Laurence O'Toole Church. The proposed development has a negative effect on this view of the Church spire. Whilst the height of the tower is lower than the St. Laurence O'Toole church spire; the massing of the tower competes with the church spire. More significantly this view also highlights the blunt massing, repetitive fenestration and lack of vertical articulation in the façade of block D.

View 22 Coburg Place

This view lines almost perfectly with the proposed axis formed between the C and B blocks; and as such affords a perpendicular perspective with the northern-eastern elevations of blocks C1, C2 & B3. In juxtaposition to the existing low level residences on the street; the development dominates the sky to the southwest. The B-blocks and the D blocks exhibit their sheer elevational mass from this viewpoint; to which there is little relief. These elevations are devoid of significant character and are of a poor design aesthetic.

The slenderness ratio of the C1 tower works quite well from this perspective; however the massing of the C3 block is at the maximum of what could be conceived as a tolerable limit.

View 24 Seville Place Approaching Oriel Street Junction

This view is one that is an off-axis perspective of the proposed development; and captures the assemblage of building scales and elevation treatments that appear quite random and under-considered. The buildings blocks are stepped down from the tower block C1; towards the viewer location; however it is apparent that there has been little attempt to scale down the B3 block in height towards Seville Place at four stories higher than the C3 block.



To the left corner of the view the intense scale of the proposed D2 block further emphasises the disproportionality with existing on Oriel Street.

View 25 Oriel Street Upper

This view is of the proposed shared pedestrian and vehicular entrance off Oriel Street looking southwest. The five-storey scale of the D2 block in comparison to the existing two-storey illustrates little consideration to the immediate context.

This will be even more apparent, should the future proposed hotel building as indicated in the masterplan document be approved as suggested in the masterplan document submitted as supporting documentation with this SHD application.

View 26 Commons Street

The proposed twenty-three storey tower block C1 in its southwest to northeast orientation displays the full southern elevation and angled south-eastern elevation.

This presents a significant and bulky mass along this view; to which a more slender profile would be preferable. From this viewpoint there is little clue as to the proposed square of which is to be the central place-making element of the public domain. The scheme concept relies only on the towering white building as a marked to assist in locating where the 'place' lies. The proposed block D presents a fifteen storey southern red-brick elevation of which detracts somewhat from the tower and has a rather bland poorly designed appearance without any significant character.

View 27 Sheriff Street Upper

This photomontage view is of the external arches to the Luggage Store vaults over to junction of Sheriff Street Lower and Common Street; which is to be the main southern presentation to the site. The view captures Block B1, the C1 tower block, C2 block and the D blocks in perspective.

Whilst not all in frame; the high mass and scale of the B block become apparent without relief. At this angled view, the slenderness of the C1 block seems relatively proportionate to its height. In the distance, the D1 block appears quite large in context with the residential street in the background.

6.0 CONCLUSION AND RECOMMENDATIONS

Overall the bulk and massing of the development has negative impacts on the quality of residential amenity, the public realm and the skyline. The central tower building, C1, as well as the remaining 'tall buildings', namely blocks Block B1, B2, B3 and D1, do not meet the recommended slenderness ratio as set out in the DCDP. The massing has a negative effect on the skyline as described in the visual impact assessment, with little attempt to provide legible articulation of the many facades.

The proposed development does not sufficiently demonstrate a resolved relationship to surrounding context and topography to the north and east of the site. The approach of applying multiple building frontage treatments does little to hide the mass bulk and scale imposed by these blocks.

An application of this order should provide a more detailed submission to enable critical evaluation of the public space in justification of its design approach. The new pedestrian routes indicated will need be actively managed to be made viable and safe; particularly in



relation to the connection with Seville Place, however no clarity as to how this will be managed has been submitted.

The vast majority of apartments are not afforded private balconies. As a compensating measure, residents are to rely on semi-private amenity spaces. However, as set out above, the amenity of some of these spaces is poor. Consideration should be given to the removal of Block B2 and repositioning of Block B1 to address this qualitative issue.

It is recommended that a more thorough analysis is required to assess the development for impact on climate change. There is no obvious strategy to provide for the adaptability of units and this is concerning due to the high proportion of studio and one-bedroom units. It would be beneficial if a largely residential development of this scale applies additional sustainable building standards such as those set out in the 'The Home Performance Index' to determine the quality and future-proofing of the development.

	Recommended Conditions
1)	Elevations and Materiality Materials to be approved by Planning Authority prior to commencement.
2)	Maintenance Strategy of the facades to be agreed with the local authority.
3)	Further detail in relation to materiality of the under crofts to be submitted.
4)	Public Realm Connectivity - Engagement with key stakeholders including An Garda Síochána and community, be undertaken to develop a comprehensive security strategy for the safe operation of Seville Place access route and to be submitted to the planning authority for approval.
5)	Lighting Study to be expanded to cover this access routes.
6)	The provision of any additional access control measures should not be added without Local Authority approval.
7)	A detailed public realm design proposal be submitted to the planning authority.
8)	Viability of the raised planter beds above basement to support the mature trees, details to be submitted for approval.
9)	Retail units to consider opening onto Oriel Street
10)	Daylight Study Analysis to be extended to assess the ground level concourse.
11)	The Highline -Further detail be submitted on the leisure areas of the Highline showing mitigating measures for wind and appropriate locations for seating be indicated.
12)	Details of screening to apartments off Highline deck level in Block B1 and B2 to be submitted.
13)	Applicant to address inconsistency on drawings as to provision of private balconies. Balcony type and provision to be agreed with the local authority.
14)	Residential Support Facilities, Services and Amenities have been indicated on architectural floor plans at the first floor level of Block C and B. However



	<p>insufficient detail has been submitted to allow an understanding of the quality of the spaces, the management of same or if adequate and appropriate allocation to residents will be provided.</p> <p>Applicant to submit a detailed clarification for prior approval from the planning authority.</p>
15)	Block B2 to be removed – and optimise the position of B1 to optimise light.
16)	Applicant to submit that a comprehensive cycling mobility plan for the development.
17)	<p>Applicant to clarify the conflict of parking numbers between drawings and the Design Statement in relation to the 58 spaces assigned to residents and its commitment to the CIE spaces.</p> <p>The mobility plan should be updated for approval with a clarification on the strategy and shared entry for different users including CIE staff.</p>

END

APPENDIX (B)

Summary

Central Area Committee Meeting

Wednesday 12th November 2019

SHD0024/19

ABP – 305676 – 19

**Lands to the Rear of Connolly Station,
Connolly Station car park,
Sheriff Street Lower,
Dublin 1.**

SHD 0024/19 – Lands to the rear of Connolly Station, Sheriff Street

Presentation by Claire Owens, Executive Planner on planning application ref SHD0024/19
ABP-305676-19 - Lands to the rear of Connolly Station Carpark, Sheriff Street Lower, Dublin
1 - Oxley Holdings.

Members in attendance:

Christy Burke
Janice Boylan
Joe Costello
Mary Fitzpatrick
Anthony Flynn
Gary Gannon
Janet Horner
Seamas McGrattan
Ray McAdam
Colm O'Rourke
Cieran Perry
Marie Sherlock

General Comments

- A lot of detail/information in the application and the members have not had time to go through it in detail. Request that the Planner's PowerPoint presentation be circulated to members and members asked for opportunity to submit individual comments to the planning department.
- Proposal has potential and it appears to be similar to a new approved housing body development recently viewed in Vienna with the concept of the highline and interconnectivity between the blocks
- Members queried if the estimated value of the development was known.
- Ownership of the site was questioned.

Built to Rent Model

- Members noted that the tenure mix is all build to let. Build to Rent is not supported on this site. Members queried if the proposed tenure was discussed with the developer at pre application stage.
- The development should be rejected because it is a build-to rent scheme that offers no homes for life in a key part of the city at a time of a housing crisis. Less than 1% are 3 bed units and there would be no affordable rental or purchase available. Members should push back and get a better development on this site.
- The site is too significant to waste and should be developed to create a sustainable and affordable residential community in the heart of the City.
- A mix of tenure is required on this key site to satisfy the demand for long term residential units with a mix of affordable rental/purchase.

- High rents will be achieved given the prime location of the site in Dublin City which will maximise profits for the developer.

Design and Layout

- Proposal is significant and likely to have impact on entire Dublin 1 area including a potential for a major impact on Sheriff Street.
- The changes in height are considered to be vast in a very concentrated area (going from 5-23 stories within the site) and members would like to have a closer look at how that impacts on the immediate locality including in 3D.
- The proposed mix of apartment sizes is not acceptable. Less than 1% of the total number of units proposed are three beds suitable for families.
- The developer had planned an even bigger percentage of studio/ one bed accommodation which demonstrates his desire to maximise profit.

Part V Compliance

- Clarification in relation to Part V provision was requested. There are serious concerns that the developer proposes to locate the Part V units in one block. Lessons have been learned from past practises of segregating local authority tenants and members highlighted the need to ensure social housing units are pepper potted throughout the development.
- The number of studios offered is not acceptable and agreement must be reached to ensure bigger sized and higher quality units are made available to the City Council.

Local Residents/Community Gain

- Construction works can be very disruptive for local residents and particularly car parking associated with construction workers etc. Members asked for clarity in relation to construction parking. The developer must undertake a traffic impact study to assess increase traffic and parking volumes in the locality and propose mitigation measures to minimise negative impacts on existing residents.
- A local employment clause must be included in the construction contract. The developer should engage with local employment agencies to ensure apprentices are given the opportunity to commence and complete their training over the lifetime of the build.
- The developer needs to protect the quality of life of local residents from the problems associated with construction e.g. noise, dust pollution, parking and additional traffic volumes. A pedestrian and cycling safety plan must be implemented in and around the vicinity of the construction site.
- Public open space should be maximised in the development given the given the scarcity of such amenities in the area. All open and green spaces should be available equally to residents and the local community.
- The local boxing club and GAA club on Seville Place should be facilitated in the development.
- Similarly all onsite recreational amenities should be available to the local community.
- Some local representatives have welcomed the development in principle but concerns were raised on relation to the size of units.

Access

- Permeability across the site welcomed. Members requested clarification in relation to access points into and through the site.
- Members request that the development is permeable for pedestrians and cyclists on a 24 hour basis.

Councillor feedback after meeting

The following feedback was received from local representatives further to the presentation on the 12th of November 2019:

- Build to rent" development on the site should be rejected.
- The site is has the potential to deliver 100s of social and affordable homes This is a hugely important state owned site with the potential to provide 100's of affordable homes and should be developed to create a sustainable and affordable residential community in the heart of our capital city. This site is ideal to recreate and redefine city living for people of all ages.
- This site is adjacent to the best public transport in the country and employment for people of levels of education, skills and training.
- There are shops, schools and amenities of all description within immediate walking distance.
- The site is in an area with less than 10% home ownership. This state owned site should be used to create forever homes for working people and start to rebuild a permanent residential community in this key location.
- The proposal for sub-standard, expensive, short term rentals should be dropped and replaced with an ambitious affordable and sustainable long-term residential development.
- Objection to the proposed development - The Connolly Quarter.
- Although in a highly built up area the density of the proposal is of concern. The design constitutes a high number of low occupancy dwelling that will introduce a number of service and infrastructure pressures into the local area. There is little evidence in the proposal on how these pressures will be mitigated.
- The impact of the proposed structure's mass and volume on adjacent two storey structures has not been reflected in the design and will deliver considerable overshadowing to the existing street and surrounding homes.
- The project does not provide for a suitable mix of housing and tenure options that would strengthen and enhance the existing community. There are few larger family units included in the proposal, supply of this housing typology is desperately needed in the area. Further to this the proposed units do not include appropriate storage and living space to ensure long term occupancy for smaller families.
- There is no clear commitment from the developer to mix tenure and social housing units throughout the proposal as would be best practice. This is a fundamental requirement if the project is to proceed.
- The impact of construction of this project will be considerable on the local residents and the wider community. The contractor must put in place robust safeguards to ensure that dust and noise pollution are minimised. We would also strongly urge the inclusion of a pedestrian and cycling safety plan around and in the vicinity of the construction site.

- Once complete the project will introduce increased traffic and parking volumes to the area. The developer must undertake a traffic impact study including active travel modes and propose mitigation actions to ensure minimal negative impact on existing residents.
- It should be an essential requirement for any development in such an important location that all onsite recreational amenities would be available to the local community for use.
- Finally we object to the lack of green space and open space being provided by this development. In an area of dense population, lacking in quality public space and suffering from high levels of air pollution, this should be a requirement. All open spaces and green areas should be available to the local and surrounding community on the same basis as project residents and that the development should be permeable for pedestrians and cyclists on a 24 hour basis.
- Concerns regarding the studios – should provide 1 bed units in place of studios.
- Parking of employee's cars and vans during development. That the developer provide parking area.
- Employment for local personal also apprentices be taken on in order to complete the trade. The boxing and GAA clubs be placed in the new development.
- Community gain be also factored into the development.