

PLANNING STATEMENT

RECEIVED: 18/09/2024

In respect of

**Proposed residential units at 4-5 Grafton Street,
Dublin 2**

Prepared for

Winthrop Co Ownership

Prepared by

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September 2024

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EXECUTIVE SUMMARY

This Planning Report is prepared on behalf of the applicant, Winthrop Co Ownership, in respect of the planning application for proposed residential units No. 4-5 Grafton Street, Dublin 2. The subject site is located within an Architectural Conservation Area. The site is also located within the area for the Scheme of Special Planning Control for Grafton Street and Environs 2019.

The applicant and design team attended a pre-application meeting (6th August 2024) with Dublin City Council to ensure any potential issues were addressed prior to the submission of the full application. It is considered that the pre-application process was very beneficial and in general the planners were welcoming of the introduction of residential units at this location in the city centre.

This planning application is accompanied by a range of documents including a series of technical reports which are enclosed separately with the planning application which should be referred to when assessing the proposed scheme.

The development will consist of a change of use of the upper floor levels (second floor, third floor and fourth floor levels) of Nos. 4 -5 Grafton Street to residential use (315 sqm) and the construction of a single storey roof top extension (42 sqm) at No. 5 Grafton Street. The area subject to the change of use and the rooftop extension will provide for a total of 4no. residential units. The proposed unit mix comprises 2 no. 1 bedroom units and 2 no. 3 bedroom units.

The subject site is located within the administrative boundary of Dublin City Council (DCC) and is therefore subject to the policies and objectives of the Dublin City Development Plan 2022-2028.

It is submitted that the proposed development is in accordance with the zoning objective of the site and the relevant policies and objectives set out in the Dublin City Development Plan 2022-2028. The proposed use is permitted in principle under the zoning objective, Z5 - City Centre.

The proposed residential units are subject to the provisions set out in the Apartment Guidelines (2023). However, we note that the Apartment Guidelines allow for some flexibility for refurbishment schemes and small sites with regards to the minimum standards, subject to achieving an appropriate level of residential amenity.

Photomontages of key views along Grafton Street are included in the Design Statement and clearly indicate that the proposed rooftop extension will not have an adverse impact on the character or setting of the Architectural Conservation Area.

It is considered that the proposed development is entirely consistent with the proper planning and sustainable development of the area. As such, it is respectfully requested that Dublin City Council grant permission for the proposed development.

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1.0 INTRODUCTION

This Planning Report is prepared on behalf of the applicant, Winthrop Co Ownership, in respect of the planning application for a proposed residential development at No. 4-5 Grafton Street, Dublin 2.

As detailed in this Planning Report, the proposed development has been designed to take account of the site circumstances with particular reference to the adjacent Architectural Conservation Area, in addition to the relevant planning policy context for the area, and in particular the Dublin City Development Plan 2022 – 2028.

The site location and context, a description of the proposed development and the planning history of the site are also outlined in order to provide a context for the proposed development.

This planning application is accompanied by a range of documents including a series of technical reports which are enclosed separately with the planning application which should be referred to when assessing the proposed scheme.

The applicant and design team attended a pre-application meeting (6th August 2024) with Dublin City Council to ensure any potential issues were addressed prior to the submission of the full application. It is considered that the pre-application process was very beneficial and in generally the planners were very welcoming of the introduction of residential units at this location in the city centre.

Please find the following enclosed with this application:

- Completed Planning Application Form (online);
- Site Notice;
- Newspaper Notice;
- Planning Statement prepared by John Spain Associates;
- Architectural Drawings, HQA and Schedule of Areas prepared by BKD Architects;
- Architectural Design Statement (and TVIA Views prepared by Digital Dimensions) prepared by BKD Architects;
- Heritage Impact Assessment prepared by Cathal Crimmins;
- Daylight Performance Assessment and Cover Letter prepared by GV8 and;
- Appropriate Assessment Screening prepared by Altemar.

2.0 SITE LOCATION AND CONTEXT

The subject site is located to the north of Grafton Street near the junction with Nassau Street and Suffolk Street. The application site comprises two existing buildings, 4-5 Grafton Street, Dublin 2. No. 4 Grafton Street comprises a 5-storey building over basement level and No. 5 Grafton Street comprises a 4-storey building over basement. The two properties are interlinked at first floor level. The basement, ground and first floor levels are primarily in use as restaurant and retail use. The other upper floors levels are commercial use, but they are currently vacant.

Grafton street is designated as a 'Category 1' principal shopping street in the adopted Dublin City Development Plan 2022-2028. The site is also located within the area for the Scheme of Special Planning Control for Grafton Street and Environs 2019.

Figure 2.1 Aerial photograph of the subject site (red line approximate only).

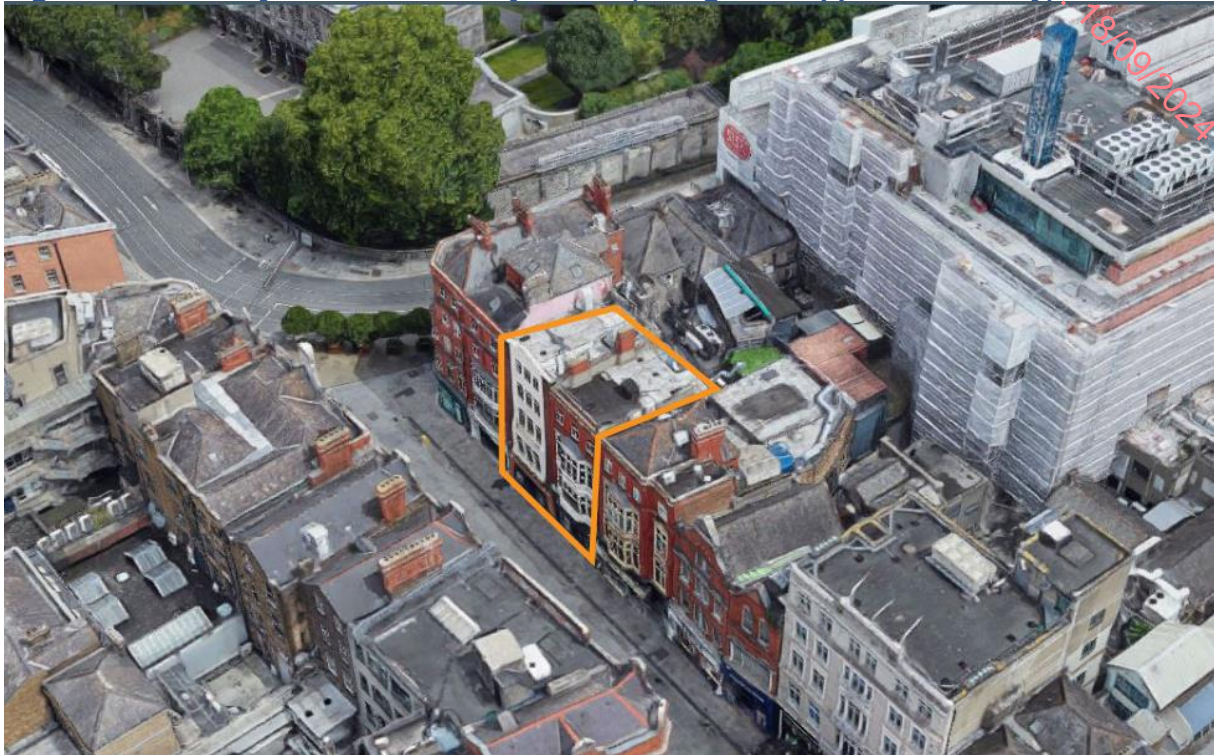


The subject site is located within an Architectural Conservation Area. No. 5 Grafton Street is listed on the NIAH register (Reg. No.: 50100005; Rating: Regional). See below description from the NBHS website:

Attached three-bay four-storey commercial building, built c. 1890 as one of unequal pair, rear having full-height projection to south end and single-storey addition to north. Hipped slate roof, concealed by red sandstone parapet with moulded cornice and frieze detailed with swags and panels and paterae. Concealed rainwater goods. Flemish bond orange brick walling, having giant pilasters to sides. Square-headed openings to top floor with plain brick reveals, slightly projecting key blocks, and flush sandstone sills; first and second floors lit by full-width double-height glazed oriel corbelled out from shopfront fascia, with original glazing configuration retained to second floor and comprising mullion-and-transom multiple-pane timber-framed casement window with canted central section, decorative apron panels, fluted frieze with roundels, topped by cornice and segmental pediment; first floor altered, but upper panes retained, and having dentillated cornice. Original shopfront retained in part, having panelled pilasters to sides with '5' incised within oval panel to each side of decorative fascia, latter

having dentil moulding, deep, plain fascia with recent lettering affixed, timber-framed display windows, chamfered frame, top-lights, and recent panelled stall-riser. Recent door serving upper floors.

Figure 2.2 Bird's eye view of the subject site (orange line approximate only).



The subject site is located close to a variety of local amenities and services within the city centre including Dublin Bus and LUAS services and Dublin Bike scheme stations. The subject site is also located within 750m (10-minute walk) and 950m (13-minute walk) from Tara Street and Pearse Street train stations, respectively.

3.0 RELEVANT PLANNING HISTORY

Subject site

A search was performed using DCC's Planning Application Map Viewer function. There were a number of previous minor planning applications for signage which relate to the subject site. None of these are considered to be of particulate relevance to the subject proposals.

Surrounding Area

The following permission is considered to be of relevant to the subject proposals for a change of use to residential:

Reg. Ref.: 3983/19 – 117 & 118 Grafton Street, Dublin 2

Dublin City Council granted permission on the 21st January 2020 for the following development:

“Planning permission for the proposed change of use, internal alterations and fit-out of second and third floor and part first floor from office use to residential use, at 117-118 Grafton Street, Dublin 2 (Protected Structure). The proposal intends 2 no. three bedrooomed apartments and 2 no. short-stay double occupancy studio residential units. The works include re-glazing existing windows to the front (north-west) facade and alterations to the rear (south-west) facade including window repair / replacement and the provision of 2 no. external balconies, together with a smoke vent and rooflight to the rear roof”.

4.0 PRE-APPLICATION CONSULTATION

The evolution of the design for the proposed development has been guided and informed by the surrounding context, national, regional and local planning policy objectives and the issues and points raised during the pre-application meeting with Dublin City Council.

The pre-application meeting in relation to the development at No. 4-5 Grafton Street was held on the 6th August 2024 and was attended by Garrett Hughes and Audrey Taylor of DCC Planning Department and Mary MacDonald of DCC Conservation Department

The proposals now submitted to Dublin City Council are considered to be in accordance with the proper planning and sustainable development of the area and address each of the points raised during the pre-application discussion.

5.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The following section provides details of the proposed development which is submitted as part of this application. Please refer to the accompanying drawings and reports for full details of the proposed development.

Detailed Description of Development

The proposed development is described as follows, per the accompanying site notices:

The development will consist of:

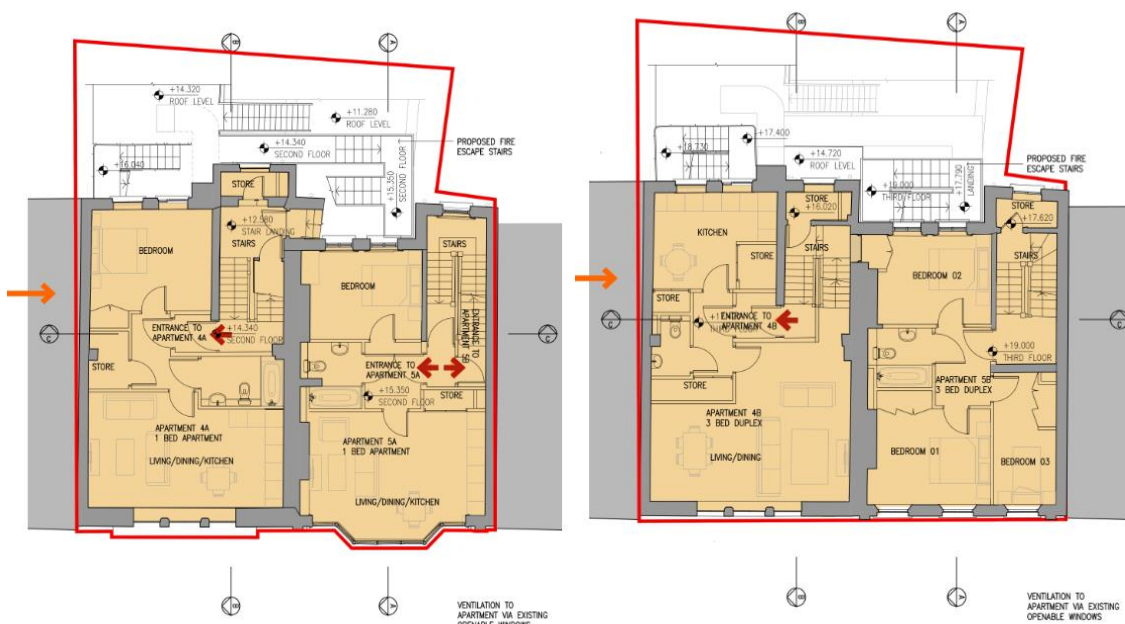
- Change of use of the upper floor levels (second floor, third floor and fourth floor levels) of Nos. 4 -5 Grafton Street to residential use (315 sqm);
- The construction of a single storey roof top extension (42 sqm) at No. 5 Grafton Street;
- The proposed unit mix is as follows: 2 no. 1 bedroom units and 2 no. 3 bedroom units;
- Change of use of circulation areas serving the proposed units at ground floor (10 sqm) and first floor (17 sqm) levels within No. 5 Grafton Street to residential use;
- The provision of private open space in the form of a terrace at roof level of No. 5 Grafton Street to serve Unit 5b;
- The provision of a new external fire stair to the rear of No. 5 Grafton Street;
- Relocation of existing telecommunications at roof level;
- All associated site works to facilitate the development.

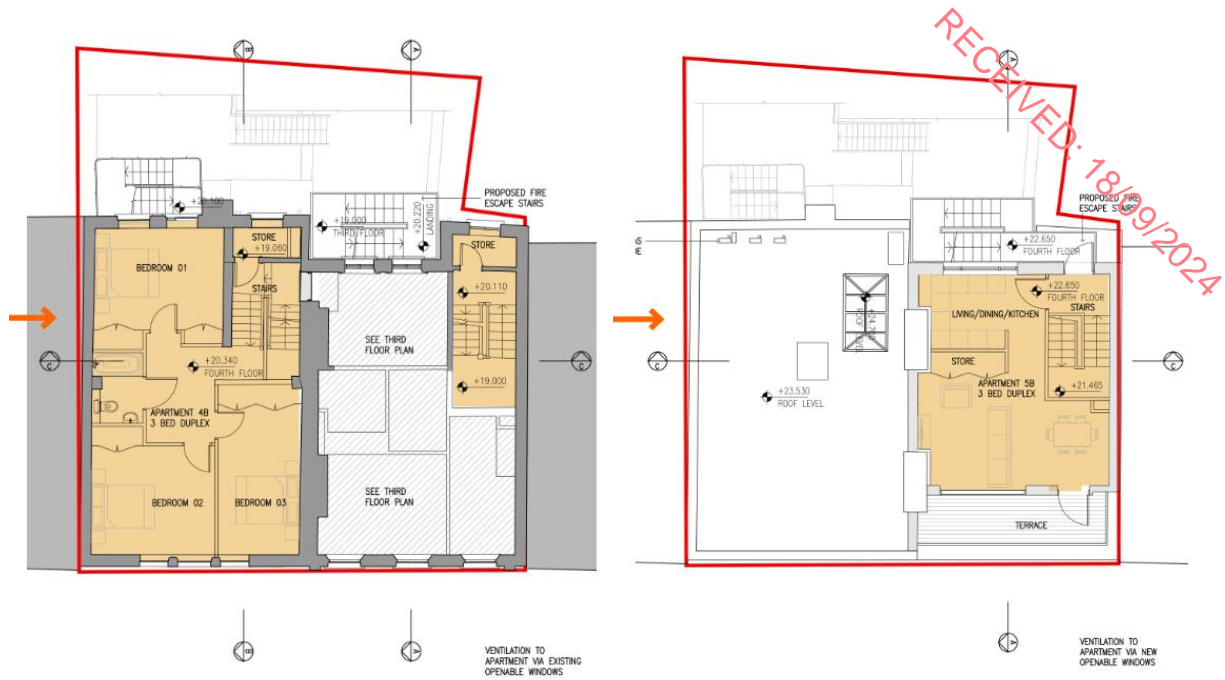
Change of Use

The proposed development comprises the change of use of the upper floor levels (second floor, third floor and fourth floor levels) of Nos. 4 -5 Grafton Street to residential use (315 sqm). The other upper floors levels are in commercial use, but they are currently vacant.

It is also proposed to change the use of the circulation areas serving the proposed units at ground floor (10 sqm) and first floor (17 sqm) levels within No. 5 Grafton Street to residential use.

Figure 5.1: Extract from the proposed floor plans prepared by BKD Architects.





Rooftop Extension

A rooftop extension is proposed at No. 5 Grafton Street. The extension will have a GIA of 42 sqm. The extension has been set back 2.1m to avoid any significant visual impact along Grafton Street.

Figure 5.2: View of properties from Grafton Street.



Proposed view from Grafton Street

Materials

All external materials on the existing facades are being retained.

The materials and finishes of the setback rooftop extension will be a metal cladding. The railings of the rooftop terrace will be a metal to match the proposed extension.

Figure 5.3: Extracts from Design Statement showing Materiality (BKD Architects)



External Fire Stair

A new external fire stair is proposed to the rear of No. 5 Grafton Street from first floor level to fourth floor level to provide a means of escape from the proposed residential units in the event there is a fire.

Drainage and Water Supply

All existing drainage and water supply arrangements serving the properties are being retained. As such, there are no new connections proposed as part of the proposals.

Access & Parking

No car parking is being proposed to serve the proposed residential units. Given the location of the site within the city centre of Dublin and the lack of road access to the site, it is considered appropriate to not providing any car parking spaces.

No bicycle spaces are proposed to serve the units. See below section for justification for this approach.

Telecommunications Mast

A telecommunication mast at roof level of No. 4 Grafton Street will be relocated from the front of the roof to the rear to accommodate to the proposed rooftop extension.

6.0 NATIONAL AND REGIONAL PLANNING POLICY

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development are set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- National Planning Framework 2040;
- Regional Spatial & Economic Strategy for the Eastern & Midland Region 2019;
- Sustainable Urban Housing: Design Standards for New Apartments 2020 (as amended);
- Sustainable Residential Development and Compact Settlement Guidelines 2024 and;
- EU Birds and Habitat Directive

National Planning Framework (NPF) 2040

The National Planning Framework is the Government's plan to cater for and guide the additional development required in Ireland by 2040. The NPF supports the creation of a strong economy to ensure national prosperity on a global scale.

National Policy Objective 5 seeks to *'develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity'*.

Objective 11 of the National Planning Framework states that *"there will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth"*.

Objective 13 of the National Planning Framework also states that:

"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment".

The proposed development will provide for an increased provision of residential accommodation in an existing urban area adjacent to existing public transport facilities. The development is accessible to a range of existing services and amenities.

The NPF also states that that *"to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas"*.

Objective 35 states that it is an objective to:

"increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site based regeneration and increased building heights".

The proposed development will provide for new residential units within an existing building in accordance with the NPF policies and objectives. The proposed development increases the residential density within the city centre. The NPF provides for a strong emphasis towards increased densities in appropriate locations within existing urban centres and along public transport corridors.

Regional Spatial & Economic Strategy for the Eastern & Midland Regional Assembly (2019)

The Regional Spatial and Economic Strategy is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond. The Eastern and Midland Regional assembly (EMRA) was established in 2015 as part of the regional tier of governance in Ireland.

The RSES also includes a Metropolitan Area Strategic Plan (MASP) for the Dublin area, into which the proposed development falls. The MASP is an integrated land use and transportation strategy which promotes strategic growth along transport corridors and sets out development opportunities including regeneration of lands. The MASP includes a number of Guiding Principles such as: compact sustainable growth, integrated transport and land use, increased employment density at the right places, and the better alignment of growth.

The principal function of the assembly is the delivery of a Regional Spatial and Economic Strategy (RSES), a new concept in Irish planning where not only the spatial but also the economic factors that go into the future of the region are brought together into one all-encompassing strategy.

Policy RPO 4.3 states the following

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

Settlement Strategy

Dublin City and Suburbs: Support the consolidation and re-intensification of infill, brownfield and underutilised lands with 50% of all new homes to be provided in the existing built up area of Dublin City and Suburbs in tandem with the delivery of key infrastructure to achieve a population of 1.4 million people by 2031.

“For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.”

The overarching vision statement of the RSES is ‘to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all’.

The proposed development provides for new residential units within an existing building in the city centre, providing higher densities in proximity to public transport and avoiding further inefficient and unsustainable sprawl whilst helping to meet an identified need for quality residential accommodation. The subject site is advantageously located, capable of providing quality apartments within the existing building, adjacent to high quality public transport.

Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2022

The Sustainable Urban Housing Design Standards for New Apartments were published in March 2018 and updated in July 2023 with changes to provisions for Build-To-Rent proposed

developments. The proposed apartments subject to this application are not designated for Build to Rent and so are not affected by the most recent amendments.

The guidelines provide for guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland. The overall objective of the Guidelines is to give tangible effect to government policy which supports increased building height and density in locations with good public transport accessibility. The Guidelines identify development management criteria which must be taken into account in the assessment of individual planning applications by planning authorities.

At the outset, we note that the proposal comprises a refurbishment scheme to provide for 4 no residential units on a site that measures 0.023ha. Therefore, in some instances the standards set out in the Apartment Guidelines may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality.

A key inclusion in the guidelines is the acknowledgement of the importance of strategic sites in existing urban areas in close proximity to existing public transport facilities. The guidelines identify locations in cities and towns that may be suitable for apartment development as follows:

- Central and / or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and / or Less Accessible Urban Locations

The subject site is located within a central and / or accessible urban location. The Apartment Guidelines note that these locations are generally suitable for denser apartment development and differing standards including for parking. These locations are categorised as including the following:

- *Sites within walking distance (i.e. up to 15 minutes or 1,000-1500m), of principle city centres or significant employment locations, that may include hospitals and third level institutions;*
- *Sites within reasonable walking distance (i.e. up to 15 minutes or 1,000-1,500m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 10 minute peak hour frequency) urban bus services.*

The subject site is located within the city centre along Grafton Street. The subject site is located close to a variety of local amenities and services within the city centre including Dublin Bus and LUAS services and Dublin Bike scheme stations. The subject site is also located within 750m (10-minute walk) and 950m (13-minute walk) from Tara Street and Pearse Street train stations, respectively.

It is therefore considered that the proposed development is suitable for increased densities in accordance with the objectives of the apartment guidelines.

The Guidelines also note that in Central and / or Accessible Urban Locations planning authorities must consider a reduced overall car parking standard.

“In more central locations that are well served by public transport, the default policy is for car parking to be minimised, substantially reduced or wholly eliminated in certain circumstances.”

There is no car parking proposed to serve the residential units. This is considered acceptable as the proposal is a refurbishment scheme, which is located proximate to a number of

employment hubs and services in the city centre, as well as near high-capacity public transport. These conditions permit the entire omission of parking, and as such the quantum proposed for the development is overall submitted as being acceptable.

Specific Planning Policy Requirement 1

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

In this regard, the proposed development consists of only 2 no. 1 bed and 2 no. 3 bed apartments, and it is considered acceptable in this regard.

Specific Planning Policy Requirement 2

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

Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;

Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;

For schemes of 50 or more units, SPPR 1 shall apply to the entire development.”

The proposed development constitutes a refurbishment scheme on a site of 0.1 hectares, and therefore SPPR2 is applicable. The proposed mix consists of 2 no. 1 bed (2 person), 1 no. 3 bed (5 person) and 1 no. 3 bed (6 person) apartments. As only 4 no. apartment units are proposed and these do not include studio units, the proposed unit mix is considered acceptable in this regard.

Unit Sizes

Specific Planning Policy Requirement 3

“Minimum Apartment Floor Areas:

Studio apartment (1 person) 37 sq.m

1-bedroom apartment (2 persons) 45 sq.m

2-bedroom apartment (4 persons) 73 sq.m

3-bedroom apartment (5 persons) 90 sq.m”

Under the guidelines, compliance with the minimum sizes are shown below:

Table 1: Apartment Size Guidelines

Unit	Min. Guidelines	Min. Proposed
Unit 4a	45 sqm	53 sqm
Unit 5a	45 sqm	46.4 sqm
Unit 4b	94 sqm	120.8 sqm
Unit 5b	86 sqm	97.7 sqm

The Apartment Guidelines require that the majority of units exceed the minimum by 10%. 3 no. units proposed meet and exceed the minimum floor area standards by at least 10%. Unit 5a does not exceed the minimum by 10%.

Dual Aspect

SPPR4 requires:

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

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

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

The subject site is a central and/or accessible site and therefore the 33% minimum requirement for dual aspect units applies. All of the units proposed are dual aspect.

Floor to Ceiling Height

SPPR 5 requires:

“Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.”

Not applicable to the proposed development.

Specific Planning Policy Requirement 6

“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.”

The proposed development does not exceed the standard set out under SPPR 6.

Required Minimum Floor Areas and Standards

Minimum Aggregate Floor Areas

A HQA is included as part of the Architectural Design Statement which identifies any shortfalls (see below extract). The unit floor areas are well in excess of the minimums with all units being dual aspect and will provide a good level of amenity for residents.

UNIT LABEL	UNIT DESCRIPTION	FLOOR LEVEL	UNIT REFERENCE NUMBER	AGGREGATE LIVING AREA				DOUBLE BEDROOM 1				DOUBLE BEDROOM 2				DOUBLE BEDROOM 3				SINGLE BEDROOM				AGGREGATE BEDROOMS		
				AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	WIDTH PROVIDED (m)	WIDTH REQUIRED (m)	AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	WIDTH PROVIDED (m)	WIDTH REQUIRED (m)	AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	WIDTH PROVIDED (m)	WIDTH REQUIRED (m)	AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	WIDTH PROVIDED (m)	WIDTH REQUIRED (m)	AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	WIDTH PROVIDED (m)	WIDTH REQUIRED (m)	AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	
YROR12 STOREY	1 BED (5P)	5	4a	23.6	23	3.31	3.3	13.8	11.4	3.39	2.8													13.8	11	
YROR2 STOREY	1 BED (5P)	5	4b	23.9	23	3.73	3.3	11.5	11.44	2.98	2.8													11.5	11	
DUPLEX	3 BED (6P)	3&4	4b	39.3	37	5.24	3.8	13	13	3.20	2.8													38.5	36	
DUPLEX	3 BED (5P)	3&4	5b	31.2	34	5.80	3.8	12.1	13	3.16	2.8	10.7	11.4	11.4	3.39	2.8	12.3	11.4	2.60	2.8	7.8	7.1	2.05	2.1	30.6	32

Communal and Private Open Space

The Apartment Guidelines note communal and private amenity space requirements may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality, for building refurbishment schemes on sites of any size.

Only one unit (Unit 5b) will be provided with private open space in the form of terrace. This was possible given the new build element at roof level. Due to the ACA, use of existing structure and restricted nature of the site, it is not possible to provide communal or private open space, however, given the quality of the proposed units (which are all dual aspect) and proximity to Stephen's Green, this is considered justifiable.

UNIT REFERENCE NUMBER	FLOOR LEVEL	UNIT DESCRIPTION	UNIT TYPE	PRIVATE EXTERNAL SPACE			COMMUNAL EXTERNAL SPACE		
				AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	[compliant]	AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	[compliant]
4a	2	1 BED (2P)	SINGLE STOREY	0	5	*	0	5	*
5a	2	1 BED (2P)	SINGLE STOREY	0	5	*	0	5	*
4b	3&4	3 BED (6P)	DUPLEX	0	9	*	0	9	*
5b	3&4	3 BED (5P)	DUPLEX	9.4	9	✓	0	9	*

Storage

Two of the proposed units have a shortfall of storage space. Please see below extract from the HQA.

UNIT REFERENCE NUMBER	FLOOR LEVEL	UNIT DESCRIPTION	UNIT TYPE	AGGREGATE STORAGE		
				AREA PROVIDED (sqm)	AREA REQUIRED (sqm)	[compliant]
4a	2	1 BED (2P)	SINGLE STOREY	3	3	✓
5a	2	1 BED (2P)	SINGLE STOREY	1	3	✗
4b	3&4	3 BED (6P)	DUPLEX	15	10	✓
5b	3&4	3 BED (5P)	DUPLEX	8	9	✗

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Sustainable Residential Development and Compact Settlement Guidelines 2024

The Guidelines sets out a methodology for identifying appropriate densities in a range of settlements. Under the Guidelines, the subject site is likely to be categorised as 'City - Centre' which are defined as highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 100 uph to 300 uph (net) shall generally be applied in City - Centre.

The proposed development provides for a density of 187 uph (4/0.0213). It is noted that this is within the density range for City Centre sites.

Section 5.0 of the guidelines set out development standards for residential development.

SPPR1 in relation to separation distances between opposing windows at first floor level is not applicable in this instance, as it requires a separation distance of at least 16 metres between opposing windows serving habitable rooms, and there are no opposing windows of habitable rooms.

SPPR2 in relation to minimum private open space standards for houses sets out the following:

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sqm
- 2 bed house 30 sqm
- 3 bed house 40 sqm
- 4 bed + house 50 sqm

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity. This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

As outlined above, only one unit (Unit 5b) is served by private open space. The proposed private amenity space meets/exceeds the minimum standard set out in the Guidelines.

SPPR3 in relation to car parking sets out the following:

It is a specific planning policy requirement of these Guidelines that:

(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.

(ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.

(iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling

Applicant should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

As noted above, no car parking is proposed to serve the residential units.

SPPR4 in relation to cycle parking and storage sets out the following:

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

(i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.

(ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.

The proposed development is for the refurbishment of the existing property for residential use. As such, the subject property is restricted in terms of providing additional accessible external space for bicycle parking. As noted in the development description section, no bicycle spaces are proposed to serve the residential units. A justification for this has been set out further below in this report.

EU Birds and Habitats Directive – Appropriate Assessment

Under Article 6 (3) of the EU Habitats Directive and Regulation 30 of SI no. 94/1997 ‘*European Communities (Natural Habitats) Regulations (1997)*’ any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. Special Areas of Conservation or Special Protection Areas) must be subject to an Appropriate Assessment. This requirement is also detailed under Section 1777 (U) of the Planning and Development Acts (2000- 2010).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities has been published by the Department of Environment, Heritage and Local Government. This sets out the different stages in the AA process.

Stage 1 Screening for Appropriate Assessment is detailed as follows: Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6 (3):

- i) whether a plan or project is directly connected to or necessary for the management of the site, and
- ii) whether a plan or project, alone or in combination with other plans and projects is likely to have significant effects on a Natura 2000 site in view of its conservation objectives.

An AA screening statement prepared by Altamar and is submitted as part of this planning application. The screening report concluded that: *“On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site”.*

7.0 CONSISTENCY WITH LOCAL PLANNING POLICY

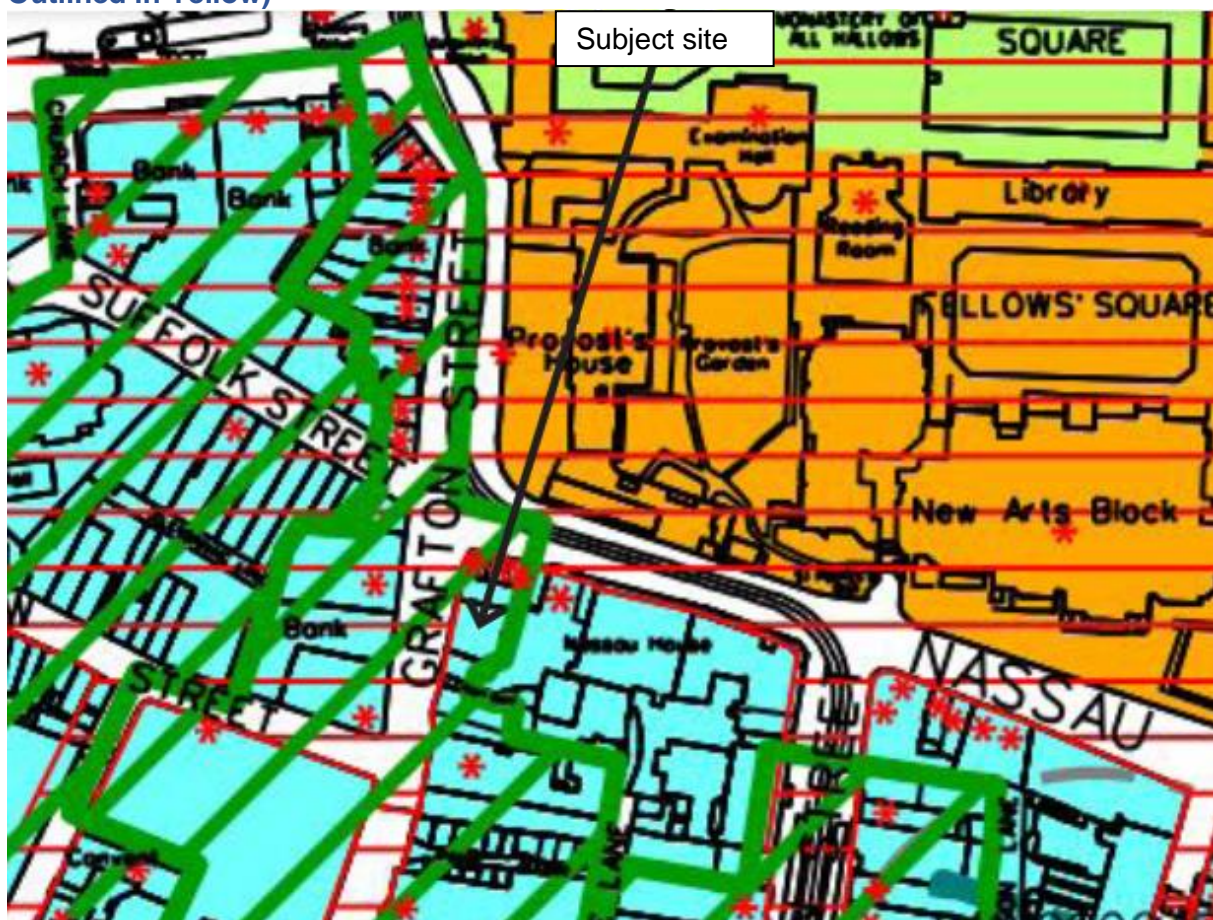
DUBLIN CITY DEVELOPMENT PLAN 2022-2028

The subject site is located within the administrative boundary of Dublin City Council and is therefore subject to the policies and objectives of the Dublin City Development Plan 2022-2028.

Zoning objective

The subject site has a Z5 -City Centre zoning objective which aims to “to consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity”.

Figure 7.1 Extract of Zoning Map E of the Dublin City Development Plan 2016-2022 (Site Outlined in Yellow)



The zoning matrix for lands zoned 'Z5' specifies that the following uses are permissible uses:

“Amusement/leisure complex, beauty/ grooming services, bed and breakfast, buildings for the health, safety and welfare of the public, café/tearoom, childcare facility, civic offices, community facility, conference centre, craft centre/ craft shop, creative, artistic, recreational building and uses, cultural/recreational building and uses, cultural, delicatessen, education, embassy office, enterprise centre, financial institution, funeral home, guesthouse, home-based economic activity, hostel (tourist), hotel, industry (light), internet café/call centre, live-work units, media-associated uses, medical and related consultants, mobility hub, nightclub, office, off-licence, off-licence (part), open space, place of public worship, primary health care centre,

public house, public service installation, recycling facility, **residential**, restaurant, science and technology-based industry, shop (district), shop (local), shop (major comparison), shop (neighbourhood), sports facility and recreational uses, student accommodation, take-away, training centre, veterinary surgery, warehousing (retail/non-food)/retail park.” (emphasis added).

The supporting text for the Z5 zoning objective sets out the following:

“The primary purpose of this use zone is to sustain life within the centre of the city through intensive mixed-use development (see also Chapters 6, 7, and 15 for policies, objectives and standards). The strategy is 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. As a balance, and in recognition of the growing residential communities in the city centre, adequate noise reduction measures must be incorporated into development, especially mixed-use development, and regard should be given to the hours of operation (see also Chapter 15: Development Standards).

Ideally, a mix of uses should occur both vertically through the floors of buildings as well as horizontally along the street frontage. A general mix of uses, e.g. retail, commercial, residential, will be desirable throughout the area and active, vibrant ground floor uses promoted. On Category 1 retail streets, retail should be the predominant ground floor use – see Appendix 2: Retail Strategy”.

We note that the proposals introduce residential uses at the upper floors of properties. The ground and first floor levels are in use as retail and restaurant. Therefore, it is considered that the proposal will contribute to a dynamic mix of uses within the area in line with the zoning objective.

Architectural Conservation Areas

Policy BHA7 – Architectural Conservation Areas –

(a) To protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area, and its setting, wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA. Please refer to Appendix 6 for a full list of ACAs in Dublin City.

(b) Ensure that all development proposals within an ACA contribute positively to the character and distinctiveness of the area and have full regard to the guidance set out in the Character Appraisals and Framework for each ACA.

(c) Ensure that any new development or alteration of a building within an ACA, or immediately adjoining an ACA, is complementary and/or sympathetic to their context, sensitively designed and appropriate in terms of scale, height, mass, density, building lines and materials, and that it protects and enhances the ACA. Contemporary design which is in harmony with the area will be encouraged.

(d) Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture.

(e) Promote sensitive hard and soft landscaping works that contribute to the character and quality of the ACA.

(f) Promote best conservation practice and encourage the use of appropriately qualified professional advisors, tradesmen and craftsmen, with recognised conservation expertise, for works to buildings of historic significance within ACAs.

All trees which contribute to the character and appearance of an Architectural Conservation Area, in the public realm, will be safeguarded, except where the tree is a threat to public safety, prevents universal access, or requires removal to protect other specimens from disease

The proposals, in particular the proposed rooftop extension have been fully developed with attention paid to the above requirements of the Development Plan. The details and specifics of the design are outlined within the accompanying Architectural Design Statement prepared by BKD Architects.

This application is accompanied by a Heritage Impact Assessment prepared by Cathal Crimmins Architects which sets out an analysis of the heritage impacts of the proposal. The overall assessment concludes that:

“The proposed development lies within the Grafton Street Area Architectural Conservation Area. Neither 4 or 5 are on the 2022-2028 Record of Protected Structures, but number 5 is listed as of Regional Importance for architectural and artistic reasons in the National Inventory of Architectural Heritage and as such may be a candidate for the RPS.

The works proposed at number 4 and 5 Grafton Street are mostly internal and will not materially affect the character of the area. The external works, as shown in the architects’ before and after images of the proposal, demonstrate that the addition of one setback penthouse floor to number 5 is, in its design, consistent with the structure itself and with the adjoining neighbouring structures and will not negatively impact on the character of the Architectural Conservation Area. The simple railing will not be apparent from street level and the dark zinc cladding will be suitable and appropriate at high level.”

It is submitted that the proposal is acceptable in this regard.

Primacy of the City Centre and Retail Core Area

The subject site is located within the city centre retail core area along a Category 1 street, Grafton Street. As such, the following policies are of particular relevance to the subject proposals:

Policy CCUV16 – Category 1 and Category 2 Streets –

To protect the primary retail function of Category 1 Streets in the city and to provide for a mix of retail and other complementary uses on Category 2 streets. To promote active uses at street level on the principal shopping streets in the city centre retail core having regard to the criteria for Category 1 and Category 2 streets (see Appendix 2 and Figure 7.2).

Policy CCUV18 – Residential Development –

To encourage, support and promote more residential apartments as part of mixed-use developments or through the reuse / retrofit of the upper floors of existing buildings. The use of upper floors for residential use is supported in principle on Category 1 and 2 Shopping Streets.

The existing retail and restaurant use at ground floor and first floor levels are being retained in line with Policy CCUV16. The proposals aligns with policy CCUV18 which aims to promote the use of the upper floors along shopping streets for residential use. This is also in line with the objectives of the Scheme of Special Planning Control for Grafton Street and Surrounding Environs and the Living City Initiative.

Apartment Standards

Please refer to the previous section on the Apartment Guidelines for a section assessing the scheme in this regard. Relevant apartment standards which are not included within the Apartment Guidelines are detailed in the sections below in this report.

Building Height

The Dublin City Development Plan 2022-2028 height strategy sets out the maximum building height within the city. Appendix 3 of the plan states that *“In general, and in accordance with the Guidelines, a default position of 6 storeys will be promoted in the city centre and within the canal ring subject to site specific characteristics, heritage/environmental considerations, and social considerations in respect of sustaining existing inner city residential communities. Where a development site abuts a lower density development, appropriate transition of scale and separation distances must be provided in order to protect existing amenities”*.

The proposed set back roof top extension will increase the height of No. 5 Grafton Street from 4 storeys to 5 storeys, the additional storeys align with other properties along the streetscape. It is considered that the additional height achieved is acceptable and will not have a significant visual impact from the streetscape along Grafton Street.

Please refer to the TVIA views contained within the Architectural Design Statement (pages 21-28).

Plot Ratio and Site Coverage

The Dublin City Council Development Plan 2022-2028, Appendix 3 identifies indicative plot ratio standards of 2.5-3.0 and an indicative site coverage of 60-90% for a central area. These figures are indicative only; higher plot ratios and site coverage may be acceptable.

The proposed development achieves a plot ratio of 3.8. It is submitted that this density is acceptable in the context of the surrounding buildings and the site's location in the city centre.

Site coverage is as per existing, 92%.

Dual Aspect

Section 15.9.3 of the Development Plan states that *“Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate”*.

Per the apartment guidelines, in city centre locations this standard may be relaxed to 33%. Nonetheless, we note that all of the proposed residential units are dual aspect.

Aspect, Daylight/ Sunlight and Ventilation

Section 15.11.2 in relation to aspect, daylight/sunlight and ventilation sets out the following *“The orientation and layout of house units should maximise the use of natural daylight and sunlight as much as possible. Where feasible, the main habitable rooms (living / kitchen) should have south and/or west facades.....All habitable rooms must be naturally ventilated and lit”*.

We note that all of the habitable rooms are naturally ventilated and lit. A Daylight Performance Report has been prepared by GV8 and is submitted in support of this application. The assessment concluded that:

“When all testing is considered, it is reasonable to conclude that the development proposed demonstrates substantial levels of conformity with daylight guidelines. In making best use of this property, it is inevitable that some departures from advisory targets will be encountered; provision is made within current planning policy to accommodate departures of this nature in instances where wider planning objectives countervail, see Appendix B: Discretion available to Planning Authorities.”

It is GV8’s view that the proposed development strikes a reasonable balance between the objective to increase residential activity in this neighbourhood, the need to safeguard the future of these historic buildings, and the need to provide future occupants with access to reasonable levels of daylight amenity”.

Refuse Storage

Section 15.9.13 of the Development Plan states that *“Refuse storage and collection facilities should be provided in all apartment schemes. Refuse storage should be accessible to each apartment stair/ lift core and be adequately sized to cater for the projected level of waste generation, types and quantities”.*

There is no external space within the subject site which is accessible from the proposed residential units that would be a suitable location for refuse storage. It is proposed that refuse collection will take place as per the existing arrangements along Grafton Street which is collected in refuse bags from the street daily.

Ventilation for Restaurant – Take Away

Section 15.14.7.4 outlines that all ventilation proposals should avoid direct extracts at street level to ensure no interference with pedestrians and odour. While it is noted that no takeaway/restaurant use in being proposed as part of this application. There is an existing restaurant at ground floor level of the property. The ventilation system for the restaurant is expelled at above the roof level at No. 4 Grafton Street. As such, it is considered that these will not interfere with the proposed residential units.

Open Space

The public open space requirement for residential developments shall be 10% of the overall site area as public open space, on Z5 lands. The proposed development does not provide any public open space, due to the refurbishment nature of the site and its size constraints, while the need to maintain the building line was an important consideration in the overall development.

Section 15.8.7 of the Development Plan further states that *“financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the City Council Parks Programme, in fulfilment of this objective”.* It also states however *“Financial contributions in lieu of public open space will only be applicable in schemes of 9 or more units”.* The proposal is for 4 units and so falls below this.

Car and Cycle Parking

Having regard to the nature of the uses proposed and the central and accessible location of the site, its proximity to a range of public transport facilities and the range of employment locations that can be accessed by bike or by foot, it is intended to provide limited on-site car parking.

This is consistent with the policy prescribed in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, December 2022, which state the following:

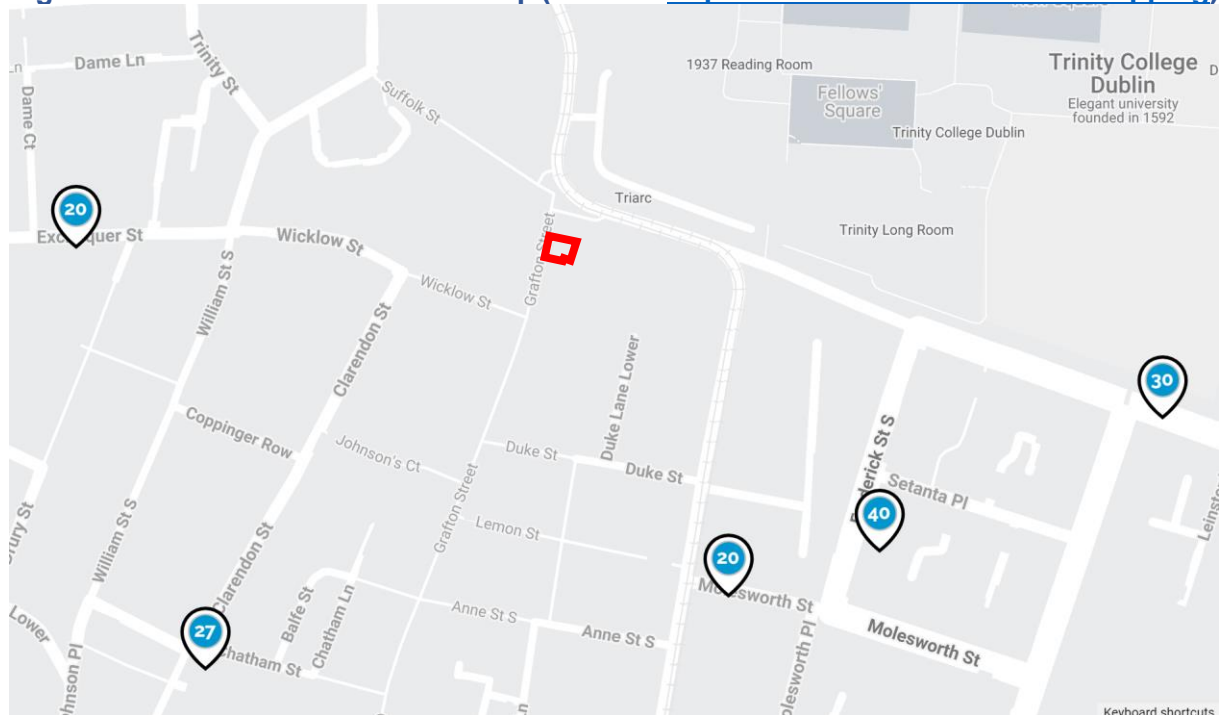
'In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity'.

As detailed in the above, the subject site is defined as a central and/or accessible location in the Apartment Guidelines and thus is appropriate for reduced/zero carparking. Having regard to its location close to high quality public and alternative transport links, its proximity to Employment Centres in the city centre, no car parking is being proposed to serve the apartment units. This is appropriate given the availability of public transport in the area.

Cycle parking is required to be provided at a rate of 1 space per apartment bedroom. As such, there would be a requirement to provide 8 no. bicycle parking spaces. There is an additional requirement of 1 visitor space per two apartment (2 no. spaces).

The subject site does not have an accessible external space which can be used to provide bicycles spaces. The design team considered providing bicycle spaces internally. However, it was not considered appropriate to provide bicycle racks in the circulation area at ground floor level due to for safety concerns. Another option was to provide the space within the proposed units, but this was not considered practical given the number of stairs between the ground level and the units. Therefore, given the nature of the proposed development which comprises a refurbishment scheme on a restricted inner city and the proximate to a number of bike sharing schemes in the city centre (i.e. Dublin Bikes and Bleeper Bikes), it is considered appropriate to not provide any bicycle spaces to serve the proposed units.

Figure 7.2 Extract of Dublin Bikes Map (Source: <https://www.dublinbikes.ie/en/mapping>)



Additional Standards

The below details additional relevant standards contained within the development plan, which are considered to be relevant to residential proposals.

Quality Housing

The following 'Quality Housing and Sustainable Neighbourhoods' policies and objectives are considered to be of relevance to the subject site:

Quality Housing Policies and Objectives
QHSN9 Active Land Management: <i>To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.</i>
QHSN10 Urban Density: <i>To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.</i>
QQHSN11 15-Minute City: <i>To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.</i>
QHSN37 House and Apartments: <i>To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation</i>
QHSN38 Housing and Apartment Mix: <i>To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.</i>

As set out within this report, the proposals provide for a high-quality residential development within an existing underutilised property located in the city centre within close proximity to existing services and public transport links which align with policy QHSN9 and QQHSN11.

The proposed development provides for two high quality 3 no. bed units (family sized units).

The proposed development provides for 2 no. 1 bedroom units and 2 no. 3 bedroom units. It is considered that the proposed development provides for an appropriate mix of units which cater for a range of dwellers including families.

8.0 CONCLUSIONS

On behalf of Winthrop Co Ownership, we submit a planning application for a proposed residential development at No. 4-5 Grafton Street, Dublin 2. The development will consist of a change of use of the upper floor levels (second floor, third floor and fourth floor levels) of Nos. 4 -5 Grafton Street to residential use (315 sqm) and the construction of a single storey roof top extension (42 sqm) at No. 5 Grafton Street. The area subject to the change of use and the rooftop extension will provide for a total of 4no. residential units. The proposed unit mix comprises 2 no. 1 bedroom units and 2 no. 3 bedroom units

As detailed in this Planning Report, the proposed development has been designed to take account of the site circumstances with particular reference to the Architectural Conservation Area, in addition to the relevant planning policy context for the area, and in particular the Dublin City Development Plan 2022 – 2028.

The Dublin City Development Plan zoning designation for the subject site is 'Z5 – City Centre' which aims to *"to consolidate and facilitate the development of the central area, and to identify, reinforce, strength and protect its character and dignity."* 'Residential' is a permissible use under this zoning objective. It is considered that the subject site is a highly appropriate location for residential development. The location of the site is adjacent to the existing residential uses. Therefore, it is considered that the principle of the proposed development is acceptable.

In this context it is submitted that the proposed development is in accordance with the zoning objective of the site and the policies and objectives set out in the Dublin City Development Plan 2022-2028.

The proposed residential units are subject to the provisions set out in the Apartment Guidelines (2023). However, we note Apartment Guidelines allows for some flexibility for refurbishment scheme and small sites with regards to meeting the minimum standards, subject to achieving an appropriate level of residential amenity.

Photomontages of key views along Grafton Street are included in the Design Statement and clearly indicate that the proposed rooftop extension will not have an adverse impact on the character or setting of the Architectural Conservation Area.

It is considered that the proposed development is entirely consistent with the proper planning and sustainable development of the area. As such, it is respectfully requested that Dublin City Council grant permission for the proposed development.