

APPENDIX 3

Achieving Sustainable Compact Growth Policy for Density and Building Height in the City

1.0 Introduction

It is adopted planning policy at both national and regional level to promote compact growth and provide for increased density and height on underutilised lands within core urban areas in order to promote consolidation, prevent further sprawl and address climate change. Increasing height and density however, can also bring challenges in terms of design and sustainability.

The purpose of this Appendix is to set out guidance on how to achieve appropriate and sustainable compact growth in the city and specifically, to ensure consistency with the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) and the SPPR's contained therein. Guidance is set out regarding appropriate areas for increased density and height. A comprehensive set of performance based criteria are detailed for the assessment of applications where significant urban intensification is proposed. These criteria are to ensure that a form and intensity of urban development is achieved that contributes to the overarching objectives of the plan to create sustainable communities and high quality places for people to live and work. The guidance is to ensure the highest standard of design and the protection of existing amenities and the natural and historical assets of the city. Guidance regarding landmark buildings is also set out.

2.0 Policy Context

As detailed in Chapter 1 of the Plan and in the Core Strategy, both the **National Planning Framework** and the **Regional Spatial and Economic Strategy** including the **Metropolitan Area Spatial Plan** promote urban consolidation and the delivery of new homes and employment opportunities within the built up footprint of existing settlements. The development of brownfield lands, particularly those that are well served by public transport, for attractive, well designed and liveable neighbourhoods is promoted. NPO 13 identifies building height as an important measure to achieve compact growth and states 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".

National Policy Objective 35 states:

“Increased 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”.

In December 2018, the **Urban Development and Building Heights Guidelines for Planning Authorities** were published. This policy document sets out a new approach to the consideration of building height in our urban areas. The Guidelines are published under Section 28 of the Planning and Development Act 2000 (as amended). They include a number of Specific Planning Policy Requirements (SPPRs) which a Planning Authority is required to have regard to and shall apply in the carrying out of their functions, including the preparation of the development plan.

The guidelines recognise the role that height plays in the achievement of compact cities and densification. It is noted that increased height is a significant component in making the optimal use of sites in urban areas where public transport, employment, services and retail development can achieve a requisite level of intensity for sustainability. The guidelines also note that increased building height is a factor in assisting modern placemaking and improving the overall quality of our urban environments.

The guidelines are explicit that it is inappropriate for a Development Plan to include generic height limits across their functional areas. It is considered that this approach undermines wider national policy objectives to provide more compact forms of urban development. It is also considered that such blanket limitations can hinder architectural innovation and urban design.

The guidelines set out both an area based and performance criteria driven approach. The achievement of height is linked to increasing densities, although it is recognised that increased height does not necessarily mean higher densities.

Key points from the guidelines include:

- Development plans should identify locations where increase height is appropriate/promoted.
- The consideration of the appropriateness of such locations must take account of any particular environmental sensitivities.
- Key locations will include brownfield infill opportunities, old industrial areas, docklands, low density suburban shopping centres and public transport corridors.
- For sites larger than 2ha – a master planning exercise regarding their future development may be required.
- Development plans must set out a series of performance criteria in which to assess high buildings. The guidelines also set out a number of assessment criteria.
- Development Plans should include specific guidance regarding building height in historic settings.
- In driving general increases in building heights, planning authorities shall also ensure appropriate mixture of uses.

The guidelines set out 4 SPPRs. Full details of the Building Height Guidelines can be found at the following link: <https://www.gov.ie/en/publication/93d22-urban-development-and-building-height-guidelines-ud-bhg-2018/>

Other relevant guidance regarding building height and density are:

- **Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities 2018** which set out a comprehensive suite of qualitative and quantitative standards for assessing apartment developments and ensuring well designed, high quality outcomes.
- **Design Manual for Urban Roads and Streets (DMURS) 2019** which notes the importance of the relationship between building height and street width, and the role that this plays in providing appropriate enclosure of streets and spaces.
- **Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities** and the accompanying **Urban Design Manual 2009** which provides guidance on planning for sustainable neighbourhoods in differing locations and urban density.

3.0 Understanding Height and Density – the Strategic Approach

3.1 Height

Introduction

Building heights significantly define the character of cities and neighbourhoods. They are generally expressed in terms of either their overall height or their number of storeys. Height to width ratio can also be used to help define the slenderness of a taller building. Consideration of what constitutes a tall building can be subjective and also depends on context. For example, a 6 storey building in the city centre may not be considered as high, whereas such a proposal in a low density suburb, may be construed differently.

Dublin Context

There are considered to be three general categories of height in the Dublin Context.

- **Prevailing Height:** This is the most commonly occurring height in any given area. It relates to the scale, character and existing pattern of development in an area. Within such areas, there may be amplified height. This is where existing buildings within the streetscape deviate from the prevailing height context, albeit not to a significant extent, such as local pop up features. Such amplified height can provide visual interest, allow for architectural innovation and contribute to a schemes legibility.
- **Locally Higher Buildings:** These are buildings that are significantly higher than their surroundings and are typically up to 50 metres in height. Higher buildings can act as Local or District landmarks.
- **Landmark/Tall Buildings:** A landmark or tall building is one that is a significant intervention in the cityscape and skyline. They are typically located in an area that denotes a specific function such as a public transport interchange or a key urban quarter/ regeneration site. Landmark/tall buildings are typically in excess of 50 metres in height, of exceptional architectural quality, can help people navigate through the City and form memorable reference points.

Strategic Approach

The main determining factor in considering appropriate heights is the need to create exemplar urban development with attractive streets, spaces and public areas that integrate successfully with the surrounding area. The key factors that will determine height will be the impact on adjacent residential amenities, the proportions of the building in relation to the street, the creation of appropriate enclosure and surveillance, the provision of active ground floor uses and a legible, permeable and sustainable layout. At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height. Scope for taller or landmark feature buildings is generally limited to marking key areas of note.

At a strategic level, Dublin City has an intrinsic quality as a predominantly low rise city. There is a recognised need to protect conservation areas and the architectural character of existing buildings, streets and spaces of artistic, civic or historic importance. In particular, development proposals must be sensitive to the historic city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic squares and the canals. It is important to protect the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity. Opportunities for height will be promoted on sites identified in section 4 below and in accordance with the performance criteria set out in Tables 3 and 4.

3.2 Density

Introduction

Density is defined as the intensity of development on any given area of land. It can have a significant influence on the quality of a development and successful placemaking. Residential densities are predominantly expressed as dwellings per hectare. Habitable rooms per hectare or bed spaces per hectare also give an indication of the intensity of development and the likely numbers of occupants. Appropriate densities are essential to ensure the efficient and effective use of land. It is important to make the best use of the city's limited land supply in order to meet the need for new homes, jobs and infrastructure required by the city's growing population. More compact forms of development, ensuring a mix of uses, the containment of 'urban sprawl' and achieving social and economic diversity and vitality are critical for the future of the city and addressing climate change.

Excessive density however, can be problematic. Significantly higher density schemes, particularly when coupled with high buildings, can generate problems in terms of creating successful, well designed and sustainable communities. In some instances, it can have impacts on the amenities of existing residential communities and for the future occupiers of such schemes, as well as how such developments integrate with the existing urban fabric. There can also be concerns regarding the capacity of existing social and physical infrastructure to absorb denser developments.

Appropriate higher density schemes are considered to be ones that combine mixed tenure homes, public space and community infrastructure. This can often be achieved by using building forms of 4 to 8 storeys and in this regard, higher density does not necessarily equate to high rise buildings – see diagram 1 below. High quality design and placemaking are however, the critical factors when developing higher density developments.

In recent years, there has been a move towards higher densities across the city. In Dublin Docklands under the North Lotts and Grand Canal Dock Planning Scheme, densities in the range of 200 to 250 units per hectare are achieved, whereas under the Poolbeg West Planning Scheme, densities in the range of 300 units per hectare are proposed. This is achieved by developing buildings typically 5 to 8 storeys, with carefully considered landmark buildings, in order to achieve appropriately framed streets and sustainable neighbourhoods.

Strategic Approach

The strategic approach is that the highest densities should be located at the most accessible and sustainable locations. Sustainable densities in accordance with the standards set out in the Guidelines on Sustainable Residential Development in Urban Areas 2009 will be supported. An urban design and quality led approach to creating sustainable development will be promoted. There should be a focus not just on maximising density to maximise yield of it but on a range of qualitative criteria and the consideration of a wide range of other factors including architecture, urban design, community facilities and infrastructure, green infrastructure and quality placemaking.

Sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport accessibility and capacity will also

determine the appropriate density permissible. A varied typology of units will be encouraged to ensure a diverse choice of housing options in terms of tenure, unit size and design in order to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the proposal contributes to healthy place making, liveability and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods.

As a general rule, the following density ranges will be supported in the city.

Table 1: Density Ranges

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

There will be a general presumption against schemes in excess of 300 units per hectare. Recent research⁵⁷ has shown that very high density can challenge positive responses to context, successful placemaking and liveability aspirations, sometimes resulting in poor quality development. Schemes in excess of this density will be only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented.

It is acknowledged that schemes of increased density are often coupled with buildings of increased height and scale. Where a scheme proposes buildings and density that are significantly higher and denser than the prevailing context, the performance criteria set out in Table 3 shall apply.

Plot Ratio and Site Coverage

Tools such as plot ratio and site coverage can be used as part of a suite of measures to ensure higher density schemes are appropriately developed to a high standard.

⁵⁷ Superdensity The Sequel, HTA, PTE, 2015.

Plot Ratio: gross floor⁵⁸ area of the building (s) divided by the site area.

Site Coverage: the percentage of the site covered by building structures excluding public roads and footpaths.

Plot ratio can help control the bulk and mass of buildings. It expresses the amount of floorspace in relation (proportionally) to the site area. Plot ratios can determine the maximum building floorspace area or volume on a given site, but on their own cannot determine built form. The same area or volume can be distributed on a site in different ways to generate different environments. Plot ratio should, therefore, be considered in conjunction with other development control measures including site coverage, building heights, public and private open space, parking provision etc.

Site coverage is a control for the purpose of preventing the adverse effects of over development, thereby, safeguarding sunlight and daylight within or adjoining a proposed layout of buildings. It is a tool that is particularly relevant in urban locations where open space and car parking standards may be relaxed.

All applications should be accompanied by a calculation of density: units per ha and bed spaces per ha, plot ratio and site coverage. Table 2 below sets out indicative plot ratio and site coverage standards for different areas of the city.

Table 2: Indicative Plot Ratio and Site Coverage

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

Higher plot ratio and site coverage may be permitted in certain circumstances such as:

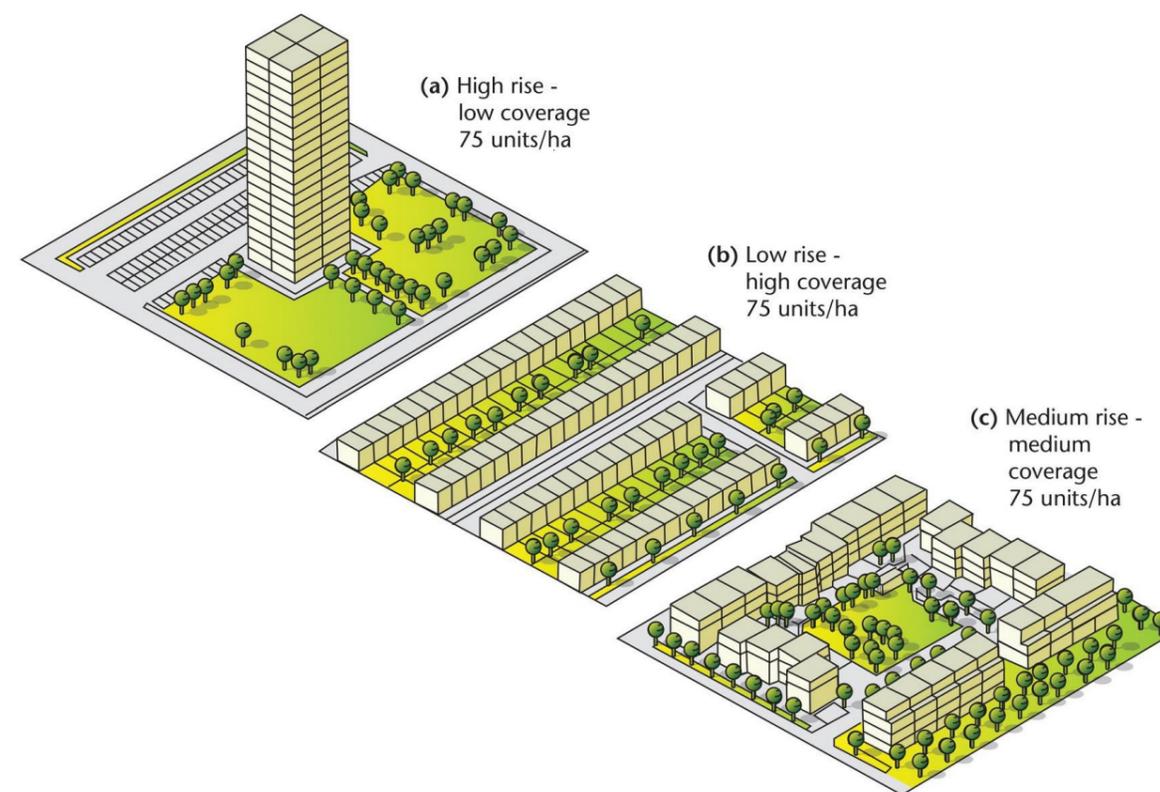
- Adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed.

58 The gross floor area is the sum of floorspace within the external wall of the building(s), excluding basements but including plant and tank rooms and car parking areas above ground level. In the case of a group of buildings with a common curtilage, the floor area will be aggregated. The site area includes only such land as lies within the curtilage of the related building.

- To facilitate comprehensive re-development in areas in need of urban renewal.
- To maintain existing streetscape profiles.
- Where a site already has the benefit of a higher plot ratio.
- To facilitate the strategic role of significant institution/employers such as hospitals.

Any development with a plot ratio over 3.0 must be accompanied by a compelling case.

Diagram 1:



4.0 The Compact City – How to Achieve Sustainable Height and Density?

4.1 Introduction

This section sets out a policy approach for the assessment of development of increased height, scale and density in the city that aligns with the Section 28 Guidelines. In accordance with the guidance set out therein and specifically SPPR 1, areas are identified where increased height will be supported. As per the requirements of SPPR 3, a series of performance based development management criteria are set out to ensure protection of residential, heritage, streetscape and landscape amenity. **All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3.**

Identification of Areas for Increased Height and Density

The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, key urban villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development.

The Building Height Guidelines note that general building heights of at least three to four storeys, coupled with appropriate density in locations outside what is defined as city centre, and which would include suburban areas, must be supported in principle at development plan level. The guidance also states that within the canal ring in Dublin, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of certain criteria.

In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled suburban areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height.

As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance based criteria set out in Table 3.

Key Criteria

Key criteria which all proposals for increased urban scale and height must demonstrate include:

- The potential contribution to the development of new homes, economic growth and regeneration in line with the compact urban growth principles set out in the NPF and Project Ireland 2040.
- Proximity to high quality public transport connectivity, including key public transport interchanges or nodes.
- Proximity to a range of employment, services and facilities.
- Provision of adequate social and community infrastructure.
- The availability of good walking, cycling and public transport infrastructure.
- Appropriate mix of uses, housing typologies and tenures.
- The provision of high quality public open space and public amenities.
- The resilience of the location from a public access and egress perspective in the event of a major weather or emergency or other incidents.
- That the ecological and environmental sensitivities of the receiving environments have been adequately assessed and addressed.
- Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character.
- Adequate infrastructural capacity.

In accordance with SPPR 1, the following locations are identified as generally suitable and appropriate for accommodating a more intensive form of development, including increased height.

Key Locations

City Centre and within the Canal Ring (inner suburbs)

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 and heritage/environmental considerations. 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.

Proposals for increased height within key sensitive areas of the city including the city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic Georgian core and squares and the canals etc. must demonstrate that they do not have an adverse impact on these sensitive environments and that they make a positive contribution to the historic context. Heights greater than 6 storeys within the Canal Ring will be considered on a case by case basis subject to the performance criteria set out in Table 3.

Strategic Development Zones SDZ's

- North Lotts and Grand Canal Dock
- Poolbeg West
- Grangegorman

There are existing Planning Schemes for these areas which include detailed development frameworks that promote an appropriate scale, form and density of development. Detail is set out regarding the appropriate location for taller local landmarks as well as block layouts to ensure an appropriate scale of development. Development proposals in these areas must be in accordance with the provisions and framework set out in the relevant Planning Scheme.

Local Area Plans (LAPs)

- Ballymun
- Park West/Cherry Orchard
- Ashtown/Pelletstown
- Clongriffin-Belmayne
- Naas Road

Local Area Plans have been prepared for a number of areas, all of which promote appropriate intensification and consolidation of these strategic areas. In these areas, proposals will be assessed in accordance with the overall objectives and policies set out in the LAP. Ballymun, Park West/Cherry Orchard, Naas Road and Clongriffin-Belmayne (North Fringe) are also identified as Strategic Development Regeneration Areas, and proposals should have regard to the guiding height principles set out in Chapter 13. Where an LAP expires over the lifetime of the Development Plan, proposals will be considered on their merits and in accordance with the performance criteria set out in Table 3.

Strategic Development Regeneration Areas

A number of Strategic Development Regeneration Areas have been identified in the city. These areas are to be the focus of compact growth over the plan period with the objective to facilitate ongoing intensification, infill and compaction. A series of guiding principles has been set out for each SDRA (Chapter 13) which promote appropriate heights and local landmarks depending on the SDRA location and context. Development proposals that align with these guiding principles will be supported. All proposals for greater height than the prevailing context and intensification in SDRA's must demonstrate compliance with the performance based criteria set out in Table 3.

The following SDRA locations are considered particularly appropriate for higher buildings and density as per the guiding principles and Framework Plans set out in Chapter 13 in each case:

- Heuston and Environs
- Liberties and Newmarket Square
- Grangegorman / Broadstone
- St. James Medical Campus and Environs
- Clongriffin/Belmayne and Environs
- Naas Road
- Docklands
- St. Theresa's Gardens and Environs
- Finglas Village Environs and Jamestown Lands
- North East Inner City
- Emmet Road

Key Urban Villages

12 Key Urban Villages are identified and policies and objectives regarding their future development are set out in Chapter 7. Urban villages are at the heart of residential communities. They function to serve the needs of the local communities providing a range of commercial and community uses for surrounding neighbourhoods. A number of the Key Urban Villages have the potential to fulfil the '15 Minute City' role with compact urban and mixed use development; higher urban densities; viable commercial cores with a comprehensive range of high quality community and commercial facilities; high quality urban environments; and high levels of access to quality public transport / the development of sustainable transport modes.

Many of the city's urban villages are underdeveloped and have scope for greater intensification and consolidation. It is acknowledged however, that some of the urban villages have a prevailing low density character and any proposals for increased height and density will need to have regard to the existing pattern and grain of development to ensure sensitive and successful integration with the existing urban fabric.

Former Z6 Industrial Lands

There are significant pockets of low intensity brownfield industrial lands in the city. Many of these sites are strategically located in city and have potential for significant intensification. Some of these sites have been zoned for residential sites have been zoned for residential or mixed use development and provide opportunities to develop significant new mixed use and residential neighbourhoods that will contribute the overall sustainable growth of the city. Such areas have the capacity to provide a variety of housing typologies including apartments, houses and duplex units to provide sustainable neighbourhoods.

In general, heights of 4-6 storeys is supported on such sites, subject to compliance with the key criteria set out above and the performance criteria set out in Table 3. Where such sites abut existing lower density residential areas, appropriate transition of scale and separation distances must be provided in order to protect existing amenities. Heights greater than 6 storeys may be considered on a case by case basis where there is a strong placemaking and urban design rationale.

Public Transport Corridors

There is recognised scope for height intensification and the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors including:

- Bus connects/QBC's
- Luas
- Metrolink
- DART

Development proposals will primarily be determined by reference to the proximity of new public transport infrastructure and to the area character. Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan. Highest densities will be promoted at key public transport interchanges or nodes.

The capacity of public transport will also be taken into consideration in considering appropriate densities and must be demonstrated by the applicant, particularly where such public transport infrastructure is in the pipeline and not yet developed.

Where a proposal for increased height and density is planned adjacent to proposed public transport infrastructure, the applicant must consider appropriate phasing and sequencing of development to ensure that an appropriate scale and intensity of development, coupled with adequate social and physical infrastructure, is delivered in tandem with the delivery of such public transport infrastructure.

It is acknowledged that many sites along such transport corridors are smaller infill sites. Particular regard must be had to ensure that proposals are of a coherent scale and provide a sustainable and viable extension to the existing urban fabric.

Outer City (Suburbs)

Outside of the canal ring, in the suburban areas of the city, in accordance with the guidelines, heights of 3 to 4 storeys will be promoted as the minimum. Greater heights will be considered on a case by case basis, having regard in particular to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity and compliance with all of the performance criteria set out in Table 3.

Criteria for Assessment

Masterplan

A design-led approach to optimise density and height is advocated and this should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form. In considering higher density proposals including buildings of enhanced height, international best practice indicates that it is possible to create successful places based around streets and a variety of urban typologies, including houses and medium-rise apartment blocks, as well as some carefully integrated taller buildings. Schemes that use urban typologies of 4 – 8 storeys can create better homes and neighbourhoods at surprisingly high densities, and are more cost-effective than other solutions.

There will be a requirement that for any significant scheme (on sites greater than 0.5ha) seeking to increase densities and height that a masterplan is prepared. The masterplan should provide a vision for the development of the entire site area, including how new buildings, streets, blocks, pedestrian and cycling routes, parks, and publically accessible and private open spaces will fit within the existing and planned context. It should include urban design studies to inform the architectural approach and to allow for the early testing of open space quantum, sunlight, daylight, visual impact and wind effects.

Proposals seeking to optimise densities need to demonstrate how they assist in delivering a vibrant and equitable neighbourhood - walkable, compact, green, accessible, mixed and balanced - responding positively to the existing or emerging context. Where extensive development is proposed, clear phasing and sequencing of development should be set out to ensure the appropriate delivery of social and physical infrastructure in tandem with the development. Such masterplans should also incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place to service new development – see Appendices 11, 12 and 13 of the plan.

Higher density proposals including enhanced building height should be accompanied by a landscape and visual impact assessment with appropriate computer generated images (CGI's) and photomontages to demonstrate how the development will assimilate appropriately with the existing urban context.

Performance Based Criteria

Successful urban living and the creation of a compact city is all about forming urban areas where people can live, work and play. The use of urban land must be optimised in terms of sustainable densities. This however, must be balanced with the provision of an appropriate mix and range of uses; scale and integration with surrounding areas; high quality public realm and green infrastructure; appropriate pedestrian, cycle and public transport connections as well as accessibility to community facilities and social infrastructure. A 'healthy placemaking' approach (see also Chapter 5) should be taken as the key focus of all higher density proposals.

The performance criteria to be used in assessing urban schemes of enhanced density and scale is set out in the table below. In proposing urban scale and building height, the highest standard of urban design, architectural quality and placemaking should be achieved. Further criteria for the assessment of land mark buildings is set out separately below.

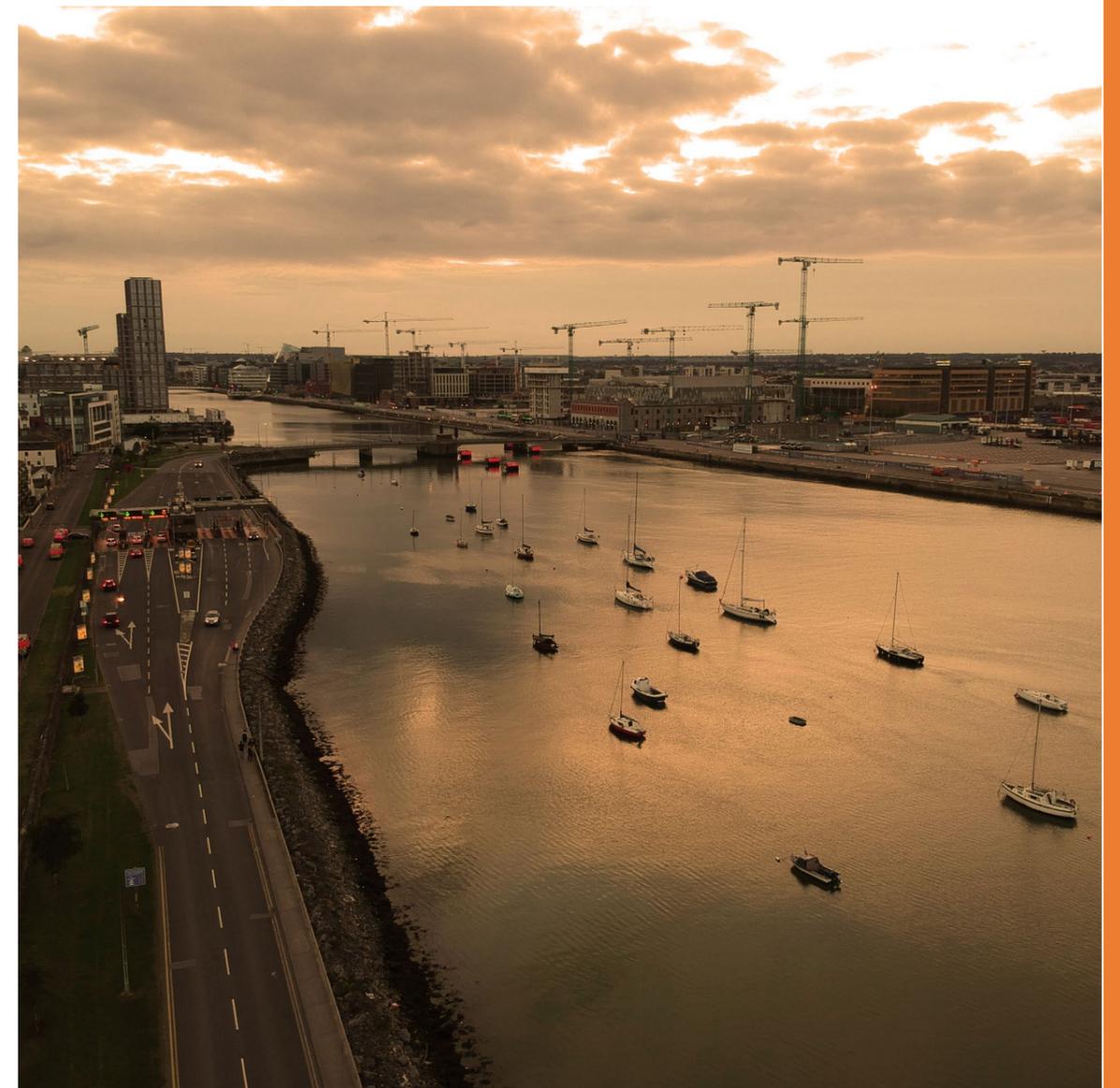


Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale

	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
1.	To promote development with a sense of place and character	Enhanced density and scale should: <ul style="list-style-type: none"> • respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, • have a positive impact on the local community and environment and contribute to 'healthy placemaking', • create a distinctive design and add to and enhance the quality design of the area, • be appropriately located in highly accessible places of greater activity and land use intensity, • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well-considered design response that avoids long slab blocks, • ensure that set back floors are appropriately scaled and designed.
2.	To provide appropriate legibility	Enhanced density and scale should: <ul style="list-style-type: none"> • make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability.
3.	To provide appropriate continuity and enclosure of streets and spaces	Enhanced density and scale should: <ul style="list-style-type: none"> • enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.

	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
4.	To provide well connected, high quality and active public and communal spaces	Enhanced density and scale should: <ul style="list-style-type: none"> • integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards, • ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, • ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, • ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, • provide for people friendly streets and spaces.
5.	To provide high quality, attractive and useable private spaces	Enhanced density and scale should: <ul style="list-style-type: none"> • not compromise the provision of high quality private outdoor space, • ensure that private space is usable, safe, accessible and inviting, • ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, • assess the microclimatic effects to mitigate and avoid negative impacts, • retain reasonable levels of overlooking and privacy in residential and mixed use development.

	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
6	To promote mix of use and diversity of activities	Enhanced density and scale should: <ul style="list-style-type: none"> • promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure, • contribute positively to the formation of a 'sustainable urban neighbourhood', • include a mix of building and dwelling typologies in the neighbourhood, • provide for residential development, with a range of housing typologies suited to different stages of the life cycle.



	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
7	To ensure high quality and environmentally sustainable buildings	Enhanced density and scale should: <ul style="list-style-type: none"> • be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16, • not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, • ensure a degree of physical building adaptability as well as internal flexibility in design and layout, • ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, • maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage, • be constructed of the highest quality materials and robust construction methodologies, • incorporate appropriate sustainable technologies, be energy efficient and climate resilient, • have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sun lighting proposals. Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or securing wider objectives such as comprehensive urban regeneration or an effective urban design and streetscape solution – see Appendix 16, • incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place – see Appendix 13, • include a flood risk assessment - see SFRA Volume 7.

	Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
8	To secure sustainable density, intensity at locations of high accessibility	Enhanced density and scale should: <ul style="list-style-type: none"> • be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport, • look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.
9	To protect historic environments from insensitive development	Enhanced density and scale should: <ul style="list-style-type: none"> • not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below. • be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed, • assess potential impacts on key views and vistas related to the historic environment.
10	To ensure appropriate management and maintenance	Enhanced density and scale should <ul style="list-style-type: none"> • Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.

5.0 Landmark/Tall Buildings

Introduction

Landmark/tall buildings have a role to play in the future development of Dublin as a compact city. Such buildings can have advantages in terms of increasing density, promoting regeneration and helping people navigate through and around the city. Appropriately located landmark/tall buildings can contribute to the development of sustainable

communities and neighbourhoods particularly to optimise the capacity of sites which are well-connected by public transport and have good access to services and amenities. If well designed, they can make a positive contribution to the cityscape.

Conversely landmark/tall buildings can also have a significant detrimental impact on local character and the wider city, if the location or design is unsuitable. They can also have other adverse impacts including putting undue pressures on social and physical infrastructure, impacting negatively on existing residential amenities and significant adverse environmental impacts. Landmark/tall buildings can also be deemed more unsustainable and involve more embodied energy with greater energy consumption and carbon emissions. It is, therefore, essential that such landmark/tall buildings are directed to locations that can absorb their built form without significant adverse impacts, protect areas of sensitive urban character particularly the city's heritage assets and achieve excellent quality both in terms of architectural design and environmental sustainability.

Whilst such buildings have a role to play in the fabric and evolution of the urban form of the city, their development should only be in instances where there is a compelling architectural and urban design rationale for them and where it can be demonstrated that they make a significant contribution to regeneration and the economic, strength, performance and resilience of the city. There are limited areas in the city that are capable of sustaining the economic and environmental impact of such landmark/tall buildings.

Identification of Areas for Landmark/Tall Buildings

Landmark/tall buildings are generally considered to be those that are substantially taller than their surroundings and cause a significant change to the skyline. They are typically buildings greater than 50 metres in height.

In terms of suitable locations, it is considered that landmark/tall building proposals are most appropriate in locations that are identified as a significant public transport interchange and/or areas for large scale regeneration and redevelopment; that are well connected centres of employment; which have the capacity to create their own character and identity and where the existing character of the area would not be adversely affected by the scale, mass and height of a landmark/tall building.

Generally, larger sites (2ha and over) offer the greatest potential for such buildings, as these sites are more able to set their own context than smaller sites. Locations considered appropriate for landmark/tall buildings have been identified at a local policy level within existing LAPs and SDZs. In addition, a number of the Strategic Development Regeneration Areas identify locations that are considered appropriate for the development of taller building/s.

The onus is on the applicant to demonstrate in their application documentation that the site is appropriate for a landmark/tall building. Any proposal for a landmark/tall building/s must undertake a thorough context and urban design analysis and a Cityscape Assessment including detailed modelling and photomontages. It must be demonstrated that the landmark/tall building proposal will not have an adverse impact on sensitive locations including conservation areas and protected structures and sensitive views. Even where a site has been identified as an appropriate location for a landmark/tall building, the proposal must meet all of the performance based assessment criteria for landmark/tall buildings.

Criteria for Assessment

All proposals for a landmark/tall building must be assessed in accordance with the performance criteria set out in Table 4 below. It is acknowledged that landmark buildings have been identified in existing Planning Schemes. Such proposals do not need to demonstrate compliance with the criteria below and will be assessed in accordance with the framework and policy provisions set out in the relevant Planning Scheme.

Table 4: Performance Criteria in Assessing Proposals for Landmark Tall Building/s

	Objective	Performance Criteria in Assessing Proposals for Landmark/Tall Building/s
1	Exemplary Architecture	<ul style="list-style-type: none"> • All proposals must be accompanied by a detailed design statement that demonstrates the achievement of excellent design and the highest standards for future occupants. • The development should make a significant contribution to the built environment of the city. Detailed consideration must be given to the scale, form, massing and proportions of the building. A slenderness ratio of 3:1 is desirable. • The facades must be carefully articulated and animated. This can be achieved through the use of high quality materials, colour, fenestration, reflectiveness and/or expression of depth. Large, blank or inactive gables should be avoided. • The building form and layout must have regard to the density and character of the surrounding development. The applicant will be required to demonstrate the relationship and potential impacts of the proposal to the surrounding context, including topography, built form, scale, height, urban grain, streetscape, public realm, open spaces, rivers and waterways, important views and prospects, skyline and that these factors have been considered in the design approach. • Detailed consideration will be required for all lighting proposals to ensure that they are energy efficient, contribute to the design and quality of the building whilst limiting the potential for excessive light spill, glare and sky glow. • The impact of the roofscape (including telecommunications apparatus and plant rooms) must be considered and it should be designed to make an appropriate contribution to the city's skyline. • Where a landmark/tall building/s proposal abuts a lower density areas, such sites should be planned to provide lower level buildings at the perimeter assisting the transition in scale from the landmark/tall building/s down to the surrounding context. • Where a proposal of significant height is proposed, the process of design selection should preferably be by means of an architectural competition.

	Objective	Performance Criteria in Assessing Proposals for Landmark/Tall Building/s
2	Sustainable Design and Green Credentials	<ul style="list-style-type: none"> Landmark/tall buildings should set exemplary standards in terms of sustainability. Proposals should incorporate appropriate technologies and design features to minimise energy use. The applicant must demonstrate that the design is innovative and flexible and can be adapted overtime.
3	Public Realm	<ul style="list-style-type: none"> The development should contribute positively to its surroundings at street level, help create a 'sense of place', provide appropriate passive surveillance and active ground floor uses. The design of the base of landmark/tall building/s must be of a proportion, composition and scale that appropriately defines and enhances the public realm, and provides for a safe and comfortable pedestrian experience. Particular attention must be paid to the design and location of public entrances to ensure that they are legible and accessible. Detailed design and hard and soft landscape measures for the treatment of the public realm both within and external to the development must be provided. Opportunities to improve the permeability of the site and wider area should be maximised, particularly where increased pedestrian and cycle flows are envisaged.

	Objective	Performance Criteria in Assessing Proposals for Landmark/Tall Building/s
4	Environmental Impacts	<ul style="list-style-type: none"> Applications must be accompanied by detailed technical analysis and supporting reports to demonstrate how potential environmental impacts can be appropriately mitigated and avoided. It must be proven that the development will not affect the surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise and reflected glare. This should be done through the testing of accurate physical and three dimensional models, conducting wind tunnel studies, sun path studies, as well as other suitable impact simulation methods. Impacts on adjacent properties should be tested through detailed section analysis and three dimensional (3D) computer models. Potential impacts to sensitive bird or bat species should be considered where appropriate. Where the development would have a significant environmental impact, EIA screening will be required and an Environmental Impact Statement may be required.
5	Public Safety and Functional Impacts	<ul style="list-style-type: none"> Landmark/tall building proposals must demonstrate that the development creates a pleasant, safe and healthy environment for its future occupants. The design of the building should follow best practice to minimise the threats from fire, flood and other hazards. All applications must be accompanied by an assessment on potential interference with aviation, navigation and telecommunications. It must be demonstrated that buildings can be serviced, maintained and managed in a manner that will not cause disturbance or inconvenience to surrounding public realm. Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding in the surrounding areas. All tall building proposals must be accompanied by a full transport capacity assessment. The intensity of use associated with tall buildings will only be appropriate if it is supported by an appropriate level of transport capacity to ensure good pedestrian and public transport access.

Objective	Performance Criteria in Assessing Proposals for Landmark/Tall Building/s
<p>6 Visual Impact and Cityscape Analysis</p>	<ul style="list-style-type: none"> • All applications must be accompanied by a detailed visual impact and cityscape assessment to illustrate the impact on the context, especially on residential amenities, conservation areas and significant views. • The cityscape analysis should include a detailed assessment including accurate visual modelling of the existing characteristics of the built form. It should identify strategic views and present detailed verifiable fully rendered photomontages (day and night) of the proposed tall building in the context of the surrounding area (existing, proposed and cumulative). It should be demonstrated that the development makes a positive contribution to long range, mid-range and immediate views. • It must be demonstrated that the landmark/tall building/s will reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. • The cityscape study should include a simulation of the building within a 3D digital model to demonstrate the impact of the proposal. • The cumulative impact of a tall building proposal in the context of other existing and proposed tall building proposals must be considered. • Landmark/tall building proposals must demonstrate the impacts on the historic context, including the need to ensure that the proposal will preserve and/or enhance historic buildings, sites, landscapes and skylines. Landmark/tall building proposals must address their effect on the setting of, and views to and from historic buildings, sites and landscapes over a wide area. It must be demonstrated that the building will have no adverse impact on the built cultural or historical heritage of the city including Architectural Conservation Areas and Protected Structures and their curtilage and National Monuments.

Objective	Performance Criteria in Assessing Proposals for Landmark/Tall Building/s
<p>7 Tall Building Clusters</p>	<ul style="list-style-type: none"> • In general, opportunities for singular landmark/tall buildings in the city is likely to be limited. It is acknowledged from an architectural and land use perspective that it is preferable that landmark/tall buildings are clustered and the City Council supports this approach in the locations identified as suitable for taller buildings. A cohesive group of landmark/tall buildings maximises their economic and sustainable advantages. • Where clusters of landmark/tall buildings are proposed, careful attention must be paid to the roof profile in the context of the whole cluster. Clusters of such towers should be composed with the tallest at the centre of the group, falling away to the edges.

There is a general presumption against landmark/tall buildings outside of the locations specifically identified as being suitable for the provision of same in this plan in LAP's / SDZ's unless in exceptional circumstances and where it can be demonstrated by the applicant that there is a compelling architectural and urban design rationale for such a development. In such exceptional cases, **all** of the following criteria must be demonstrated:

- That the landmark/tall building complies with all of the performance criteria set out in Table 4.
- The landmark/tall building/s will emphasise a point of particular civic of visual significance and that such a proposal will contribute in a meaningful way to the legibility of the city and contribute positively to the skyline. Any such proposal for a landmark/tall building must be supported by a detailed spatial analysis demonstrating that the design and location of the landmark/tall building is appropriate and optimal.
- The landmark/tall building will act as a strategic intervention, a catalyst for regeneration and make a significant economic or cultural contribution. The landmark/ tall building proposal must also demonstrate that it is economically viable and implementable in the lifetime of the plan.

- That the landmark/tall building is located in an area with excellent high frequency, high capacity public transport accessibility and excellent pedestrian and cyclist infrastructure. The onus will be on the applicant to demonstrate the capacity of public transport and the quality of existing links between public transport and walking and cycling infrastructure and the site.
- The landmark/tall building will bring significant planning gain to the community including measures such as:
 - substantial upgrades to the public realm;
 - environmental enhancements including open space and green infrastructure to be enjoyed by residents and the wider community;
 - significant new social and community infrastructure for the benefit of the wider area;
 - where the landmark/tall building is for residential use, the provision of a broad range of accommodation for people living in different household sizes and throughout various life cycle stages.

6.0 Guidelines for Higher Buildings in Areas of Historic Sensitivity

The Urban Development and Building Heights Guidelines for Planning Authorities Guidelines state that appropriate identification and siting of areas suitable for increased densities and height will need to consider the environmental sensitivities of the receiving environment as appropriate throughout the planning hierarchy.

There are a number of environmental sensitivities in the city which contribute to its overall quality, uniqueness and identity. Developments of significant height and scale are generally not considered appropriate in historic settings including conservation areas, architectural conservation areas, the historic city centre, the River Liffey and quays, Trinity College, the Cathedrals, Dublin Castle and medieval quarter, the Georgian core and historic squares and the canals or where the setting of a protected structure would be seriously harmed by the inappropriate locating of such a proposal.

Architectural Conservation Areas

There are 24 designated Architectural Conservation Areas in the city. While the purpose of a designation is to protect and enhance the special character of an area, it does not preclude any appropriate forms of new development. Potential impact on ACA's is included in the performance criteria in Tables 3 and 4 above.

Protected Structures/National Monuments

The city has a wealth of built heritage including over 8,000 protected structures and a number of significant national monuments (see Volume 4, Appendix 6 and Map L). A balance must be struck between protection and enhancement of our protected structures/national monuments whilst ensuring appropriate and sustainable development. New development must respond to local character and protect and enhance the built heritage. New development should not have an adverse impact on a protected structure or its curtilage or on a national monument in terms of scale, height, massing, alignment and materials. Impacts on protected structures/national monuments are included in the performance based criteria set out in Tables 3 and 4.