



THORNTON O'CONNOR
TOWN PLANNING

Statement of Consistency

Planning Application

In respect of a Shared Living Residential
Development at

Brady's Public House
Old Navan Road
Dublin 15
D15 W3FW

Submitted on Behalf of
Bartra Property (Castleknock) Limited

September 2019

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1.0 INTRODUCTION

1.1 Multi-Disciplinary Team

Thornton O'Connor Town Planning in association with Todd Architects, Cronin Sutton Consulting Engineers, JV Tierney & Co Consulting Engineers, The Tree File, 3D Design Bureau, Moore Group, The Big Space Landscape Architects and AWN Consulting Environmental and Acoustics Advisors, Maurice Johnson and Partners and Eire Ecology, have been retained by Bartra Property (Castleknock) Limited to prepare this planning application in respect of a proposed Shared Living development at Brady's Public House, Old Navan Road, Dublin 15.

The *Planning & Development (Strategic Housing Development) Regulations 2017* specify that all SHD applications must be accompanied by a statement demonstrating that the proposal is consistent with the relevant National, Regional and Local policies. This Statement of Consistency Document demonstrates that the proposed scheme providing 210 No. Shared Living bedspaces is fully consistent with relevant national, regional and local planning policy.

The following documents are discussed throughout this document:

National

1. *Project Ireland 2040 – National Development Plan 2018-2027;*
2. *Project Ireland 2040 – The National Planning Framework;*
3. *National Spatial Strategy 2002 – 2020;*
4. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities;*
7. *Urban Design Manual – A Best Practice Guide (2009);*
8. *Design Manual for Urban Roads and Streets (2013);*
9. *The Planning System and Flood Risk Management (2009);*

Regional

10. *Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022;*
11. *Regional Spatial and Economic Strategy for the Eastern and Midlands Region; and*

Local

12. *Fingal County Development Plan 2017 – 2023.*

2.0 DESCRIPTION OF DEVELOPMENT

2.1 Development Description

The development will principally consist of: the demolition of the existing part 1 to part 2 No. storey over partial basement public house and restaurant building (1,243 sq m) and the construction of a part 1 to part 5 No. storey over basement Build-to-Rent Shared Living Residential Development (6,549 sq m) comprising 210 No. bedspaces (182 No. single occupancy rooms, 4 No. accessible rooms and 12 No. double occupancy rooms).

The development also consists of the provision of communal living/kitchen/dining rooms at each floor level to serve the residents of each floor; communal resident amenity spaces for all residents including tv/cinema room at basement level, gymnasium and lounge/reception area at ground floor level, a library/study at third floor level and a private dining room at fourth floor level; external roof terrace at third floor level (78 sq m) facing north-east, north-west and south-west; external communal amenity courtyards at basement (170 sq m) and ground floor level (336 sq m); external amenity space at basement level accessed from the communal living/kitchen/dining room (30 sq m); balconies at third floor level facing north-east/north-west (14.35 sq m); resident facilities including launderette, linen store, accessible WC and bin store; 2 No. accesses to the public park along the north-eastern boundary; 2 No. car-share parking spaces; a lay-by and delivery bay; emergency gate access to the courtyard (north-west boundary); bicycle parking; boundary treatments; hard and soft landscaping; plant; PV panels; substation; switch room; generator; lighting; and all other associated site works above and below ground.

2.2 What is Shared Living?

The recently adopted *Sustainable Urban Housing Design Standards for New Apartments, March 2018* sets out that:

'a new format of residential accommodation described as 'Shared Accommodation' has the potential to emerge as a distinct segment within the overall urban accommodation sector'.

The basis underpinning the Shared Living concept is that the facility will be professionally managed, and members will join a residential club with ensuite accommodation and access to shared communal amenities and facilities.

Shared Living is a way of living in urban areas that is focused on community and convenience, living in a combination of high quality communal spaces and a high function, high quality private suite with all aspects of day-to-day life taken care of within the monthly cost, including accommodation, all utilities and taxes, high speed internet access, full access to the gym, cinema room and all other communal spaces, an Events manager and access to social events, security, full cleaning and maintenance of the private suites and the wider communal area, and the provision of bed linen and regular changing thereof. The residents will also have access to Spike Global software which will support everything from access control, logging and tracking facilities issues, to clubs, events and building a cohesive community through engagement and social interaction.

Shared accommodation developments are typically targeted, but not exclusively, at younger employees who wish to live in a particular area, possibly for a defined period of time, who may wish to share with people at a similar stage of their lives or who work in a similar industry, or who have not yet developed either the wish or the resources to purchase a permanent home. Consequently, they are addressing a specific segment of the market that is not well served by more conventional types of residential development. With ongoing urbanisation, demographic trends, the need to counter the growth of commuting, and the emergence of the sharing economy, this form of housing is perceived to have a role to play in addressing the housing requirements of developed countries.

Due to the acute housing shortage prevailing and the significant demand that exists in the Blanchardstown area and the site's proximity to, inter alia, Connolly Hospital, the subject lands have been identified as an appropriate location for 'Shared Accommodation' which can provide purpose-built accommodation to meet the housing needs of a greater number of persons. It is noted that the application is supported by a Shared Living Report, a Planning Report and a Justification Report prepared by Thornton O'Connor Town Planning which provides a detailed background to 'Shared Living' as a housing typology to be encouraged in Ireland and a justified rationale for the provision of such an accommodation type at the subject location.

3.0 SITE LOCATION AND DESCRIPTION

3.1 Site Location

The site (c. 0.317 ha or 3,170 sq m) is located to the north-eastern side of the Old Navan Road close to the junction of the Old Navan Road with the N3 Navan Road. The M50 is located c. 350 m (as the crow flies) to the west of the site and the N3 merges with the M50 at this location. The subject lands are located approximately 300 No. metres (as the crow flies) to the south of the grounds of Connolly Hospital, Blanchardstown (800 No. metres / 11 No. minutes walking distance) which is a significant employer in the area currently employing over 1,100 No. staff. Castleknock Train Station is located c. 350 metres to the south-west of the site (as the crow flies) and c. 550 No. metres / 7 No. minutes walking distance.

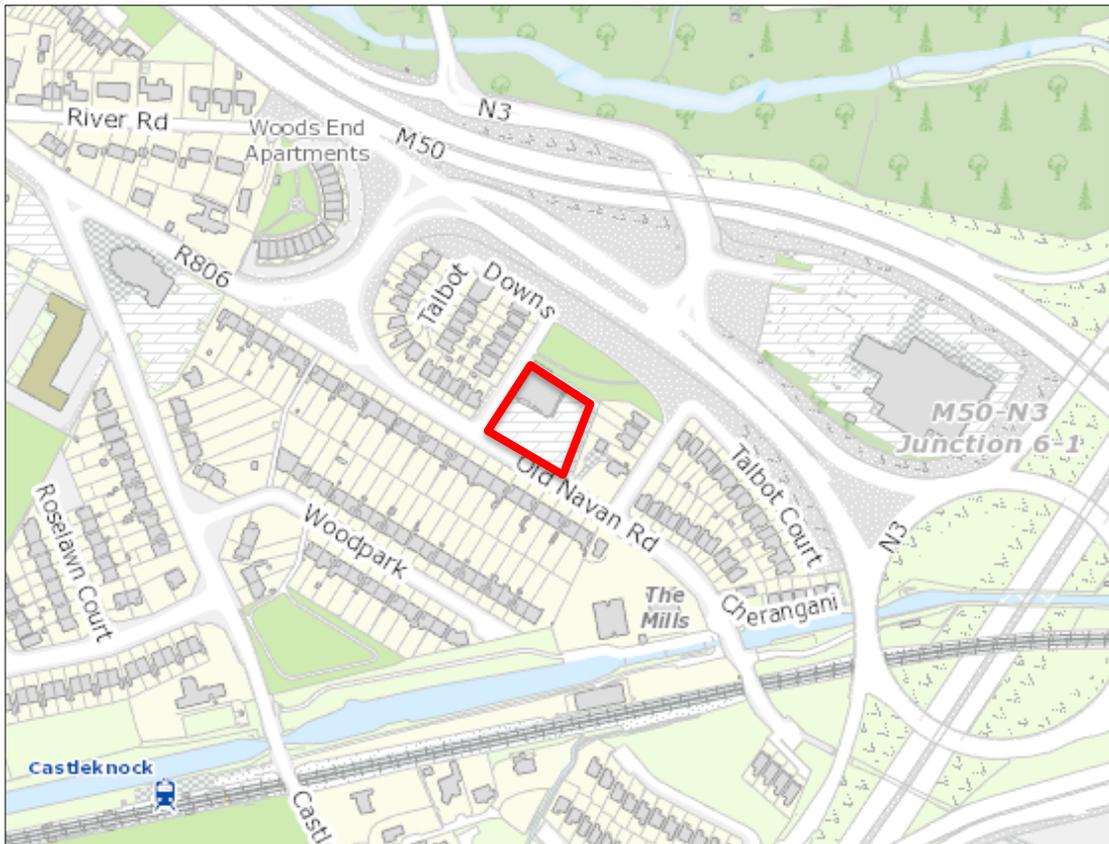


Figure 3.1: Map Identifying the Location of the Subject Site (Redline Boundary is Indicative Only)

Source: www.myplan.ie, Annotated by Thornton O'Connor Town Planning, 2019

3.2 Site Description/Existing Use

The subject site is almost square in shape and currently comprises Brady's Public House and Restaurant with associated car parking. The pub building is located to the north-east corner of the site with car parking and internal roads occupying the remainder of the site. The site is bounded to the north-east by a public park, to the south – east by a residential property, to the south-west by the Old Navan Road and to the north – west by the entrance road to the Talbot Downs residential housing estate.

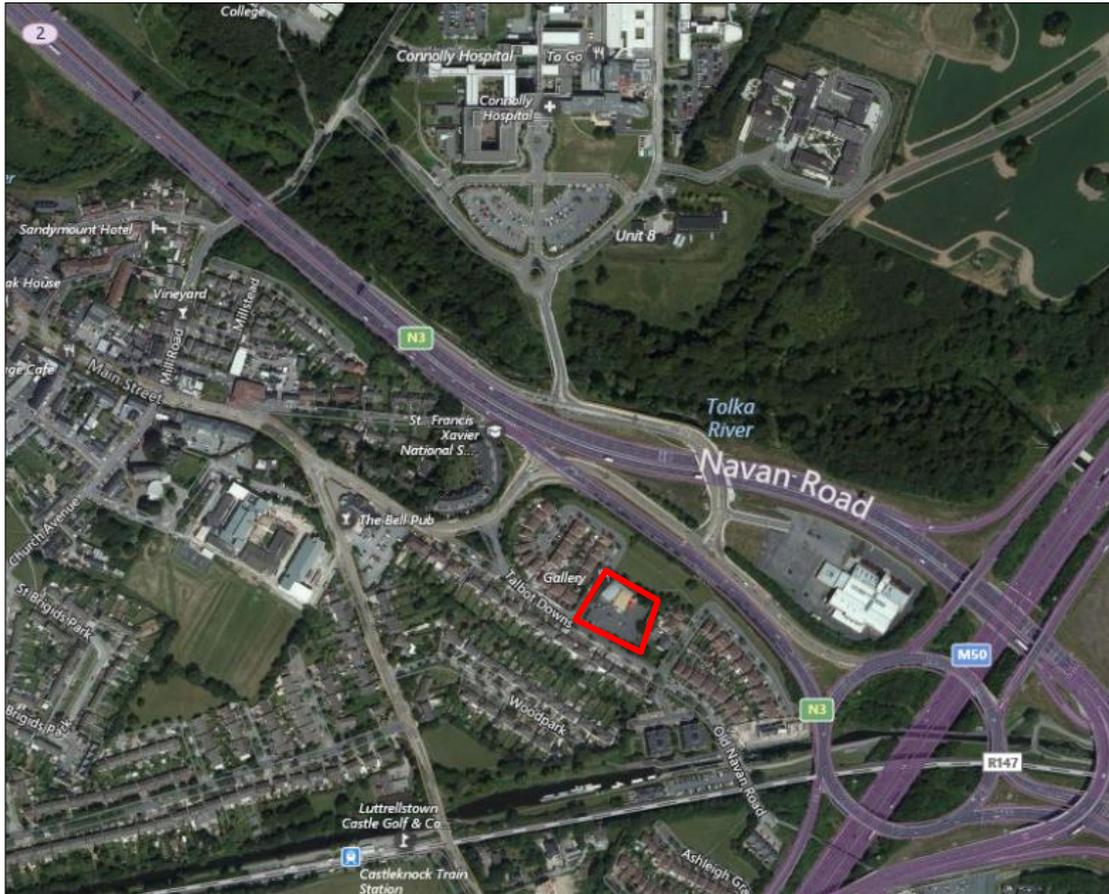


Figure 3.2: Aerial Map Showing the Location of the Subject Site (Redline Boundary is Indicative Only)

Source: Bing Maps, Annotated by Thornton O'Connor Town Planning, 2019

The existing public house and restaurant with a capacity of c. 300 No. people has long operating hours and is subject to constant traffic entering and exiting the site, particularly late into the evening. Therefore, the current use has significant potential to have an undesirable impact on the residential amenity of the surrounding area by reasons of noise and traffic, especially later into the evening. It is considered that this will be significantly reduced by the introduction of a Shared Living Residential Development which will be private car free and will not generate high levels of noise.

Although the site contains a busy public house and restaurant, the site is underutilised as the footprint of the existing building is located in the north-eastern corner with the remainder of the site used for surface car parking. Therefore, it is clear that this brownfield site has the potential and capacity to provide a high quality Shared Living Residential Development which will contribute towards alleviating the housing crisis by providing accommodation in close proximity to centres of employment and public transport, representing the sustainable redevelopment of this underutilised site.

3.3 Accessibility

The site is well served by public transport with many bus stops located in close proximity to the subject site providing easy access to locations such as Blanchardstown Shopping Centre

(No. 17a) and Ongar Village (39a) from the N3 Navan Road and Dublin City Centre (No. 38a and No. 39 from Navan Road, No. 179 from Connolly Hospital and No. 38 from the R806 Castleknock Road). Castleknock Train Station is located c. 350 metres to the south-west of the site (as the crow flies) and c. 550 metres / 7 No. minutes walking distance which facilitates easy access to locations such as Dublin Connolly Station, Pearse Station, Maynooth, Longford, Sligo and M3 Parkway.

In addition to the availability of public transport in proximity to the site, the scheme will encourage walking and cycling to and from the site. There are numerous substantial employers located within easy walking and cycling distance from the subject site such as Connolly Hospital (c. 11 minute walk/ c. 4 minute cycle), Dublin Enterprise Zone (c. 21 minute walk/ c. 6 minute cycle distance) and Blanchardstown Town Centre (c. 21 minute walk/ c. 8 minute cycle distance).

We also note the wide range of services and facilities in proximity to the subject site such as Tesco Superstore Roselawn, Blanchardstown Village including SuperValu, Bank of Ireland, Ulster Bank, Post Office, Blanchardstown Medical Centre in addition to cafes, restaurants, bars and a significant range of shops, restaurants and other services located in Blanchardstown Town Centre such as Lidl, Nando's, Subway, Blanchardstown Library etc.

The proposed scheme will create a highly sustainable development through the promotion of sustainable modes of transport.

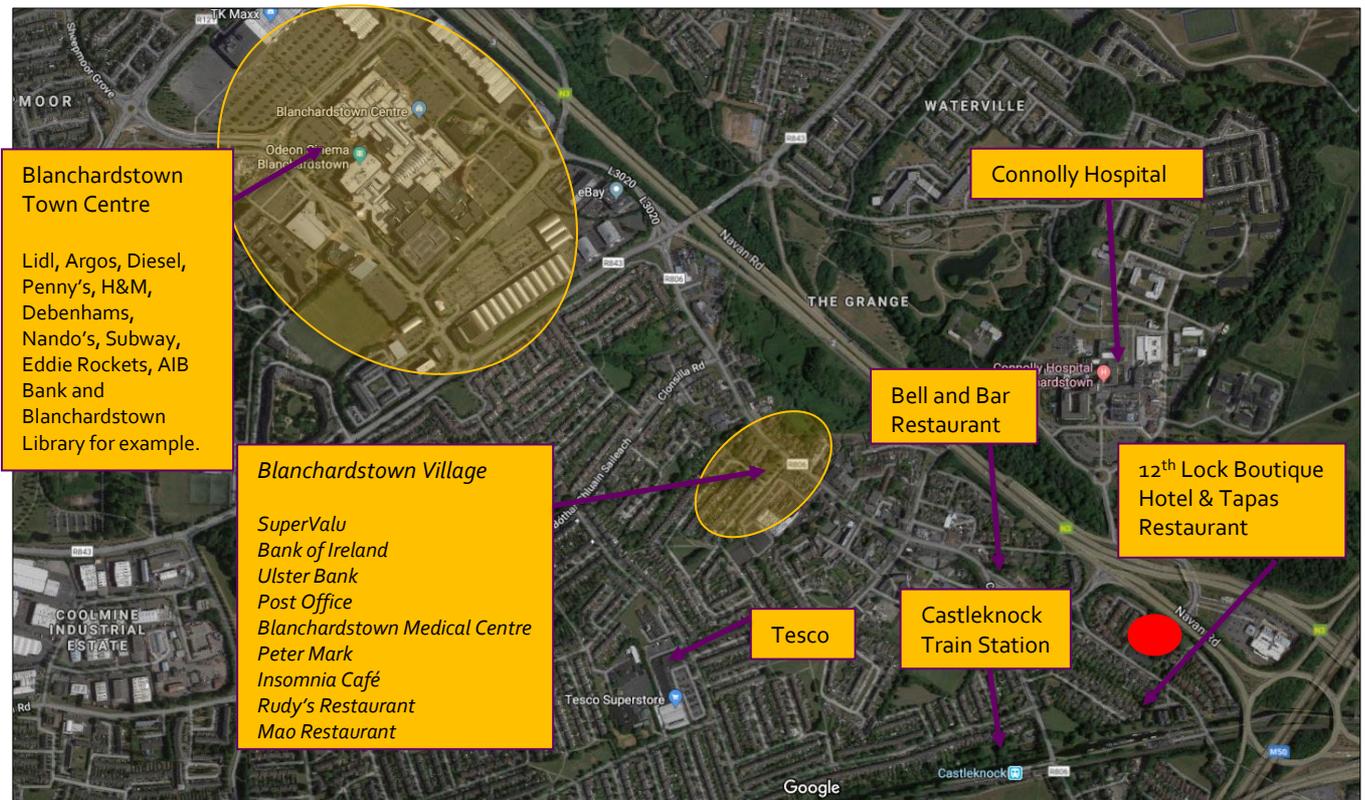


Figure 3.3: Map of the Subject Site and Receiving Context (Subject Site is Annotated by Red Dot)

Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2019

4.0 NATIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of National Policy and is consistent with the policy and objectives of the respective policy documents. The following National Policy documents are discussed in this section:

1. *Project Ireland 2040: The National Development Plan 2018 – 2027*;
2. *Project Ireland 2040: National Planning Framework*;
3. *The National Spatial Strategy 2002-2020*;
4. *Action Plan for Housing and Homelessness; Rebuilding Ireland*;
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)*;
6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018)*;
7. *Urban Design Manual – A Best Practice Guide (2009)*;
8. *Design Manual for Urban Roads and Streets*; and
9. *The Planning System and Flood Risk Management (2009)*.

4.1 ***Project Ireland 2040: The National Development Plan 2018 – 2027***

The *National Development Plan 2018 – 2027* underpins the overarching message of the *National Planning Framework*. The publication sets out how Strategic Investment Priorities are aligned with public capital investments over the next ten years to achieve each of the National Strategic Outcomes as set out in the *National Planning Framework*. The context of the National Development Plan is illustrated in Figure 4.1 below.

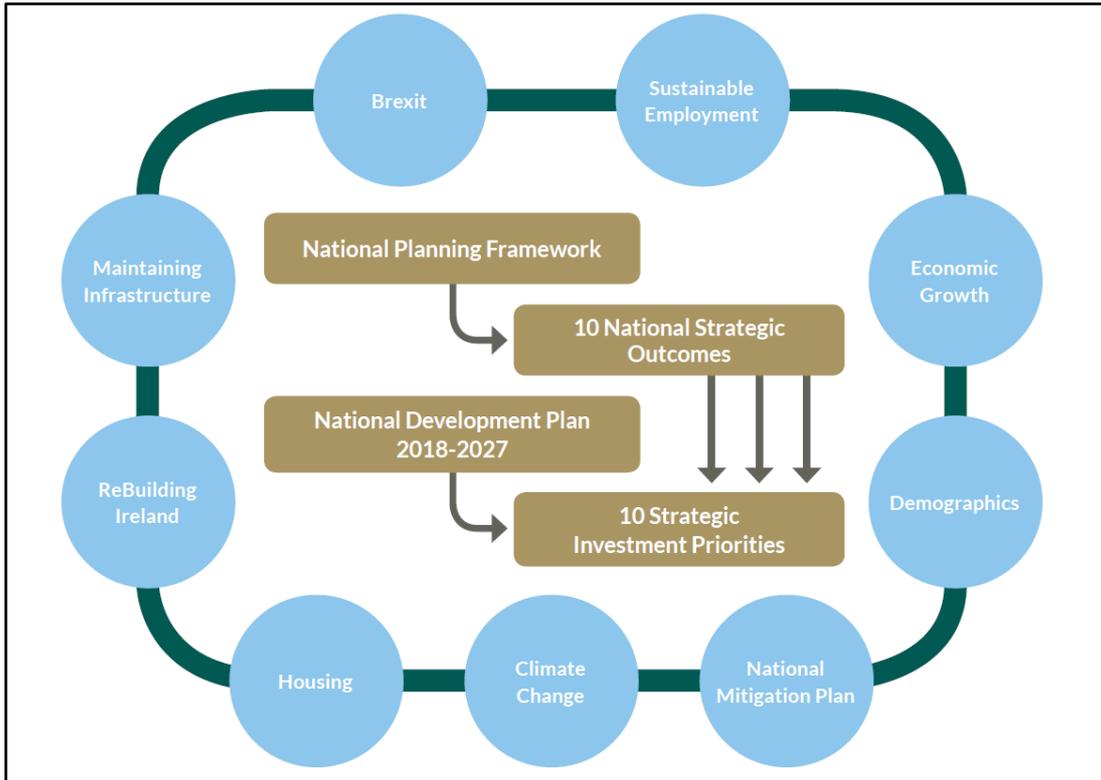


Figure 4.1: Context of the National Development Plan

Source: *Project Ireland 2040 National Development Plan 2018 – 2027*

The National Planning Framework published alongside the National Development Plan includes 10 No. National Strategic Outcomes. The relevant strategic outcomes and objectives are discussed in Section 4.2 of this report below.

4.2 *Project Ireland 2040: National Planning Framework*

4.2.1 Introduction

Project Ireland 2040: National Planning Framework (NPF) is the Government’s high-level overarching strategic plan that aims to shape the future growth and development of the country. The NPF is a long-term Framework that sets out how Ireland can move away from the current ‘business as usual’ pattern of development.

A core principle of the NPF is to:

‘Allow for choice in housing location, type, tenure and accommodation in responding to need’, in addition to tailoring ‘the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.’

Therefore, we submit that the provision of a Shared Living Residential Development at the subject site will contribute to achieving the objectives of the NPF as the scheme will provide choice for people who are searching for accommodation in Dublin, through the provision of a new type of housing tenure and type.

The NPF states that:

'while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (Census data), we are a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. In many European countries, it is normal to see 40%-60% of households living in apartments.'

The NPF further calculates that:

*'between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, with **increasing demand to cater for one and two-person households**' [Our Emphasis].*

Furthermore, it is noted that *'achieving this level of supply will require increased housing output into the 2020s to deal with a deficit that has built up since 2010.'*

The NPF highlights that 7 No. out of 10 No. households in the state consist of three people or less. In terms of changing family size, *'in Dublin city, one, two and three-person households comprise 80 percent of all households.'* It is also noted in a more general context that the *'household sizes in urban areas tend to be smaller than in suburbs or rural parts of the country'.*

The recently adopted policy document denotes that *'...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it.'* [Our Emphasis]

The proposed development is a direct response to the housing shortage that is readily reported and identified in recent planning policy. The proposed application is consistent with the policy objectives as set out throughout this section, as it provides a volume of one-bedroom units with a range of supplementary facilities and amenities that meets the need of a mobile population by providing a housing tenure not seen in Ireland previously.

4.2.2 National Strategic Outcomes and Objectives

The NPF identifies a list of 10 No. National Strategic Outcomes which set out the ambition of the NPF (to create a single vision and a shared set of goals for every community across the country) as follows:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. Sustainable Mobility;
5. A Strong Economy supported by Enterprise, Innovation and Skills;
6. High Quality International Connectivity;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Water, Waste and other Environmental Resources; and
10. Access to Quality Childcare, Education and Health Services.

A number of key national policy objectives have been identified throughout the NPF in order to successfully deliver the 10 No. Strategic Outcomes.

We have carried out an assessment of the National Policy Objectives identified in the NPF and have identified the relevant objectives that are applicable to the proposed Shared Living residential development. The relevant National Policy Objectives that are applicable to the proposed development are discussed under the following headings:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design;
- Justification and Housing Need;
- Waste and Environmental Issues; and
- Implementing the National Planning Framework.

4.2.3 Population Growth and Employment

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the five main cities. The following objectives are considered relevant to the proposed residential development:

- **National Policy Objective 1b** projects an additional population of approximately 490,000 – 540,000 No. people in the Eastern and Midland Region.
- **National Policy Objective 1c** projects an additional 320,000 No. people in employment in the Eastern and Midland Region.
- **National Policy Objective 2a** sets a target that 50% of future population and employment growth will be focused in the existing five cities and their suburbs.
- **National Policy Objective 3a and National Policy Objective 3b** aim to deliver at least 40% of all new homes nationally, within the build-up of existing settlements and to deliver at least 50% of all new homes that are targeted in the five main Cities within their existing built-up footprints.
- **National Policy Objective 4** aims to provide diverse and integrated communities ensuring the creation of attractive, livable, well designed, high quality urban places.
- **National Planning Policy 5** aims 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.
- **National Policy Objective 8** aims to ensure the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets. The targeted population growth for Dublin (city and suburbs) is a 20-25% increase from 1,173,000 No. (2016) to 1,408,000 No. (2040).

The NPF states that proposals should:

'prioritise the location of new housing provision in existing settlements as a means to maximizing a better quality of life for people through accessing services; ensuring a more efficient use of land and allowing for greater integration of existing infrastructure.' [Our Emphasis]

The NPF outlines that compact development is the preferred approach which would focus on:

'reusing previously developed, 'brownfield' land, building up infill sites, which may not have been built on before and either reusing or redeveloping existing sites and buildings.' [Our Emphasis]

The proposed development is located on an underutilised plot in close proximity to various employment locations such as Connolly Hospital, the Dublin Enterprise Zone and Blanchardstown Town Centre. The site is well served by public transport with Castleknock Train Station located c. 350 metres to the south-west of the site (as the crow flies) and c. 550 metres / 7 No. minutes walking distance and many bus stops located on the N3 Navan Road, the R806 Castleknock Road and from Connolly Hospital for example which provide access to locations such as the City Centre, Pearse Station, Connolly Station, Sligo, Longford, Maynooth and the M3 Parkway, providing significant employment opportunities for residents of the proposed scheme, by foot, bike or by public transport.

Communal spaces are provided within the scheme such as the lounge/reception, gymnasium, cinema room, communal lounges and external amenity spaces in addition to living/kitchen/dining rooms. These are high quality, attractive and livable spaces are where the residents will principally interact with each other ensuring an integrated community within the scheme. The lounge/reception area is the space where Niche Living will host social events for the residents.

The proposed scheme involves the redevelopment of an existing underutilised brownfield, infill site and therefore is fully in accordance with the preferred approach of the NPF and will also encourage social interaction between the residents of the scheme by providing high-quality communal spaces.

4.2.4 Current Trends in Tenure and Household Formation in Ireland

The NPF acknowledges that:

'at a time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained'.

The following objectives respond to the changing nature of household formations and trends in tenure seen in current planning discourse.

- **National Policy Objective 6** acknowledges the need to regenerate and rejuvenate cities, towns and villages of all types and scale that can accommodate changing roles

and functions in terms of their residential population, employment activity, levels of amenity and design quality in order to sustainability influence the surrounding area.

- **National Policy Objective 11** states that there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages.
- **National Policy Objective 32** notes a target to deliver 550,000 No. additional households to 2040.

The proposed development providing 210 No. Shared Living bedspaces will offer an alternative accommodation type in a time when the NPF acknowledges the constrained urban housing market. The scheme represents sustainable development as the site is situated in a residential area, in close proximity to a wide range of employment locations accessible by foot, bike or public transport and will contribute towards alleviating the current housing crisis.

4.2.5 Sustainable Modes of Transport

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered relevant to the proposed Shared Living residential development:

- **National Planning Policy Objective 26** outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with planning policy.
- **National Policy Objective 27** aims to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

As noted in Section 3.3, the site is well served by public transport with many bus stops located in close proximity to the subject site providing easy access to locations such as Blanchardstown Shopping Centre (No. 17a) and Ongar Village (39a) from the N3 Navan Road and Dublin City Centre (No. 38a and No. 39 from Navan Road, No. 179 from Connolly Hospital and No. 38 from the R806 Castleknock Road). Castleknock Train Station is located c. 350 metres to the south-west of the site (as the crow flies) and c. 550 metres / 7 No. minutes walking distance which facilitates easy access to locations such as Dublin Connolly Station, Pearse Station, Maynooth and M3 Parkway.

The scheme will also encourage walking and cycling to and from the site. There are numerous substantial employers located within easy walking and cycling distance from the subject site such as Connolly Hospital (c. 11 minute walk/ c. 4 minute cycle), Dublin Enterprise Zone (c. 21 minute walk/c. 6 minute cycle distance) and Blanchardstown Town Centre (c. 21 minute walk/c. 8 minute cycle distance). We note that 245 No. bicycle parking spaces are provided within the scheme which therefore will encourage this sustainable mode of transport.

In addition to the location of many significant employers within walking/cycling distance of the application site, there is also a wide range of services and facilities in proximity to the subject site such as Tesco Superstore, Supervalu, Bank of Ireland, Ulster Bank, Post Office, Blanchardstown Medical Centre in addition to cafes, restaurants, bars and a significant range of shops, restaurants and other services located in Blanchardstown Town Centre such as Lidl, Nando's, Subway, Blanchardstown Library etc.

As such the proposed development is ideally located, providing a wide range of facilities, services, employment and public transport in close proximity to the subject site.

4.2.6 Scale, Massing and Design

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the Scale, Massing and Design of developments. The following objectives are considered relevant to the proposed Shared Living residential development:

- **National Policy Objective 13** outlines that in urban areas, building height and car parking standards will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.
- **National Policy Objective 33** prioritises the provision of residential development at appropriate scales within sustainable locations.
- **National Policy Objective 35** notes the aim to increase residential density in settlements through a range of measures including (amongst others) in-fill development schemes and increased building heights.

The proposed Shared Living development is considered to positively contribute towards meeting the housing need as identified by the NPF. The NPF sets out that:

'to effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland's cities.'

The proposed development has been subject to a high quality standard of design, siting and layout, innovatively created by Todd Architects, with the height transitioning from part 1 to part 5 No. storeys in suitable locations, in order to protect the residential amenity of neighbouring properties while also appropriately densifying brownfield infill sites in accordance with the objectives of the NPF. We note that subsequent to the pre-planning consultation meeting with An Bord Pleanála, the building has been set back at second floor level by an additional 6.63 m and by an additional 3.43 m at third and fourth floor levels from the rear of properties along Talbot Court.

Whilst a 4 No. storey scheme was granted in 2017, it is considered appropriate to propose an additional partial storey on foot of the introduction of the National Planning Framework and the Height Guidelines since permission was granted. The Landscape and Visual Impact Assessment and Daylight/Sunlight Assessment demonstrate that the proposed development will not result in any significant impact on surrounding properties.

4.2.7 Waste and Environmental Issues

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Waste and Environmental Issues. The following objectives are considered relevant to the proposed residential development:

- **National Policy Objective 52** sets out that the planning system must respond to the environmental challenges and have regard to relevant environmental legislation.
- **National Policy Objective 53** is concerned with supporting greater land efficiency and use of renewable resources by reducing the rate of urban sprawl and new development.
- **National Policy Objective 54** aims to reduce our carbon footprint by integrating climate action into the planning system.
- **National Policy Objective 56** sets out the intention to sustainably managing waste generation.
- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 63** aims to ensure the efficient and sustainable management and conservation of water resources and water services infrastructure.

- **National Policy Objective 64** aims to improve air quality through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport
- **National Policy Objective 75** stipulates that '*all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.*'

As outlined at Section 4.2.3, the application lands are underutilised brownfield lands with an extant permission for residential development. The redevelopment of the subject site would encourage the use of public transport, walking and cycling, in accordance with National Policy Objective 64 which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. The scheme also proposes photovoltaic panels which encourages renewable-focused energy generation.

The extant application proposed 69 No. car parking spaces whereas the proposed scheme provides for zero car parking spaces and 2 No. car share parking spaces in addition to 245 No. bicycle parking spaces. The proposed scheme will therefore result in a lower carbon footprint and would be consistent with National Policy Objective 54 which aims to reduce the carbon footprint in the planning system.

The proposed development is supported by the following reports which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues:

- Environmental Report prepared by Thornton O'Connor Town Planning;
- Appropriate Assessment Screening Report prepared by Moore Group;
- CS Consulting Response to Item No. 6 of the An Bord Pleanála Opinion prepared by CS Consulting;
- A Mobility Management Plan prepared by CS Consulting;
- Flood Risk Assessment prepared by CS Consulting;
- Outline Construction Management Plan prepared by CS Consulting;
- Outline Demolition and Construction Waste Management Plan prepared by CS Consulting;
- Sustainability Statement prepared by JV Tierney & Co. Consulting Engineers; and
- Operational Waste Management Plan prepared by AWN Consulting.

4.2.8 Implementing the National Planning Framework

In regard to implementing the National Planning Framework, the following objective is considered applicable to the proposed scheme:

The **National Policy Objective 74** states that proposals should '*secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.*'

This section has set out how the proposed development is consistent with the relevant objectives of *Project 2040: National Planning Framework* which will contribute towards achieving the 10 No. National Strategic Outcomes also identified in the NPF as follows:

Consistency with National Strategic Outcomes			
No.	Objective:	How it is Addressed by this development:	Does it meet the criteria:
1:	Compact Growth;	Sustainable and Efficient Redevelopment of Brownfield Land	Yes
2:	Enhanced Regional Accessibility;	Proximity to Heavy Rail, Urban Cycling and Greenway Network, Royal Canal, and National Road Network (N3/ M50)	Yes
3:	Strengthened Rural Economies and Communities;	N/A – Urban Area	N/A
4:	Sustainable Mobility;	Private car free development – Promoting Active and Sustainable Transport due to proximity of high-quality public transport.	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	Close proximity to significant Employers, providing access to much sought-after residential accommodation for employees.	Yes
6:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
7:	Enhanced Amenity and Heritage;	The scheme provides a high level of amenity space for future residents. The scheme will also provide passive overlooking of the park to the north as well as a direct link into the park from within the scheme.	Yes
8:	Transition to a Low Carbon and Climate Resilient Society;	Photovoltaic panels are provided within the scheme, high energy standards of construction, incorporation of heat pumps; and a (private) car free development.	Yes
9:	Sustainable Management of Water, Waste and other Environmental Resources;	Sustainable modes of transport encouraged, and sustainable management of water use and waste output.	Yes
10:	Access to Quality Childcare, Education, and Health Services;	Wide range of childcare and education facilities in proximity, directly adjacent to a hospital of regional importance.	Yes

4.3 **National Spatial Strategy 2002 – 2020**

The *National Spatial Strategy* (NSS) is a twenty – year planning framework which aims to sustain the following through informing the spatial development of the country as a whole:

- a better quality of life for people;
- a strong, competitive economic position; and
- an environment of the highest quality.

It is noted that Fingal County Council forms part of the Greater Dublin Area (GDA). The NSS notes in relation to the GDA that:

*‘Population growth within and in many areas adjoining the GDA is being driven primarily by the investment dynamics of natural increase and high migration combined with a **very high proportion of new jobs and investment continuing to be attracted to the Dublin area.**’ [Our Emphasis]*

It is widely recognised that the GDA has experienced a rapid rate of growth in recent years that has been primarily accentuated by the country’s economic successes. The NSS acknowledges that strong growth results in a *‘particularly heavy burden of development pressures, such as housing supply difficulties and traffic congestion, on the city and its surrounding area.’*

As a result, the NSS states that *‘up to four-fifths of the population growth in the State could take place in or in areas adjoining the Greater Dublin Area over the next twenty years’*. In doing so, *‘Dublin will continue to grow in population and output terms. However, it is not desirable for the city to continue to spread physically into surrounding counties. The physical consolidation of Dublin, supported by effective land use policies for the urban area itself, is an essential requirement for a competitive Dublin’*.

As the proposed development is located on brownfield land, the scheme is in accordance with the aim of the NSS to restrict the spreading of the city outwards into surrounding counties, and will help housing supply and reduce traffic congestion by not offering the option of car parking for future residents.

The NSS notes that *‘it has been estimated that it will be necessary to provide some 500,000 additional dwellings to meet likely demand in the period up to 2010. Ireland’s housing stock per thousand of population is the lowest in the EU at 327 housing units per thousand population as compared to 435 per thousand in the UK and a European average of 450 per thousand’* which is reiterated in National Policy Objective 32 of the NPF. Although this quote is now out of date, Ireland is currently in the midst of a housing crisis and additional housing is therefore required.

The proposed development comprising 210 No. Shared Living bedspaces will provide a unique and alternative accommodation type which will contribute towards alleviating the housing crisis by providing accommodation in close proximity to centres of employment, for a specific target market that requires flexibility in tenure.

The NSS sets out criteria for the location of housing within urban areas as set out below:

- The Asset Test - Are there existing community resources, such as schools etc. with spare capacity?

The application lands are located within an area with ample services and facilities in close proximity, in addition to the amenity spaces provided within the proposed scheme e.g. gymnasium, cinema room etc. As set in in full detail in Section 2.5 of Planning Report, there is a wide range of services and facilities in proximity to the subject site such as Tesco Superstore, Supervalu, Bank of Ireland, Ulster Bank, Post Office, Blanchardstown Medical Centre in addition to cafes, restaurants, bars and a significant range of shops, restaurants and other services located in Blanchardstown Town Centre such as Lidl, Nando's, Subway, Blanchardstown Library etc.

As a result of the specific target tenancies of the application, it is considered that the capacity of schools in proximity to the site is not relevant in relation to the subject application. The proposed scheme will provide short-medium term accommodation predominately for employees working in areas of substantial employment in proximity to the site e.g. Connolly Hospital, Dublin Enterprise Zone and Blanchardstown Town Centre. The format of the subject scheme does not cater for children.

It is considered that there are sufficient community resources to serve the residents of the proposed Shared Living scheme.

- The Carrying Capacity Test – Is the environmental setting capable of absorbing development in terms of drainage etc.?

Please find enclosed an Engineering Services Report and Drawings prepared by CS Consulting which details the proposed foul drainage arrangements, stormwater drainage arrangements and watermain infrastructure arrangements demonstrating that the development can be appropriately absorbed.

- The Transport Test - Is there potential for reinforcing usage of public transport, walking and cycling?

The proposed development will promote and encourage sustainable modes of transport. As set out in detail in the Justification Report and Planning Report submitted with this application, a wide range of public transport services are available in close proximity to the site in addition to the opportunities for residents to walk and cycle to many major employment locations, and other services and facilities. Therefore, it is considered that the proposal represents proper planning and sustainable development.

The site is well served by public transport with many bus stops located in close proximity to the subject site providing easy access to locations such as Blanchardstown Shopping Centre and employers such as eBay (No. 17a) and Ongar Village (39a) from the N3 Navan Road and Dublin City Centre (No. 38a and No. 39 from Navan Road, No. 179 from Connolly Hospital and No. 38 from the R806 Castleknock Road). Castleknock Train Station is located c. 350 metres to the south-west of the site (as the crow flies) and c. 550 metres / 7 No. minutes walking distance which facilitates easy access to locations such as Dublin Connolly Station, Pearse Station, Longford, Sligo, Maynooth and M3 Parkway.

There are numerous substantial employment locations located within easy walking and cycling distance from the subject site such as Connolly Hospital (c. 11 minute walk/ c. 4 minute cycle), Dublin Enterprise Zone (c. 21 minute walk/c. 6 minute cycle distance) and Blanchardstown Town Centre (c. 21 minute walk/c. 8 minute cycle distance). Some 245 No. bicycle parking spaces are provided within the scheme which will encourage the residents to use cycling as a mode of transport. We note that Bleeper Bikes are committed to ensuring the sustainable cycle needs of the residents are met (letter of support submitted with Planning Report). Some 12 No. Bleeper Bike spaces are designated as part of the proposed scheme ensuring all residents have access to cycling facilities.

The application is submitted with a Mobility Management Plan and a Response to Item No. 6 of the An Bord Pleanála Opinion (relating to car and cycle parking) prepared by CS Consulting. The report notes that public transport information will be supplied in the Development Access Map, Sustainable Travel Pack and Travel Information Points in addition to information regarding the bus and train services that accept standard or folding bicycles.

- The Economic Development Test – Is there potential to ensure integration between the location of housing and employment?

Due to the acute housing shortage prevailing and the significant demand that exists in the Blanchardstown area as a result of significant employment generators such as Connolly Hospital, the subject lands have been identified as an appropriate location for 'Shared Accommodation' which can provide purpose-built and managed accommodation to meet the housing needs of a greater number of persons.

A Justification Report prepared by Thornton O'Connor Town Planning is submitted with the application and sets out that the site has the potential to provide an accommodation typology that is lacking in the local area, a typology that is predominately targeted towards workers that may be unable to afford the sparse rental options available in the local area and persons that may prefer to live in a designed environment that provides social interaction spaces.

- The Character Test – Will the proposal reinforce a sense of place and character?

The proposal will result in the sustainable development of an underutilised brownfield site within an existing residential area. The layout of the proposed development comprising of 210 No. Shared Living bedspaces will provide active surveillance of the local streetscape and the adjoining public park and the height of the development transitions from 1 to 5 No. storeys in appropriate locations within the site, ensuring that it can be assimilated into its surrounding context.

- The Community Test - Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?

The proposed Shared Living Residential Scheme will benefit and enhance the integrity and vitality of the local community and nearby services due to the disposable income the residents will have as a result of the affordability of this accommodation typology.

- The Integration Test - Will the proposal aid an integrated approach to catering for the housing needs of all sections of society?

As previously noted, there is an acute housing shortage currently present in Ireland and a significant demand existing for accommodation in the Blanchardstown area. Therefore, the proposed development is considered to respond to this demand for housing in the area. The Shared Accommodation typology will provide alternative and affordable purpose-built accommodation to meet the housing needs of a greater number of persons.

Furthermore, the NSS states that:

*'efficient use of land by consolidating existing settlements, focusing in particular on development capacity within central urban areas through **re-use of under-utilised***

land and buildings as a priority, rather than extending green field development.' [Our Emphasis]

The subject development proposes the reuse of an underutilised, brownfield site in proximity to a number of significant employers. It is envisaged that a significant proportion of the Shared Living suites proposed will be occupied by the healthcare workers of the expanding Connolly Hospital. However, additional demand will also be generated by other employees in the local area including the Dublin Enterprise Zone (which is continuing to expand) and the Blanchardstown Town Centre. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The development is consistent with the policy guidance as set out within the *National Spatial Strategy 2002 – 2020*.

4.4 ***Action Plan for Housing and Homelessness, Rebuilding Ireland***

The Action Plan for Housing and Homelessness – Rebuilding Ireland is the Government’s publication which recognises that a significant increase in new homes is needed. The Action Plan outlines a five pillar approach:

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposed development will to an extent have a positive impact on each of these pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 3 and Pillar 4.

- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.
- Pillar 4: Improve the Rental Sector – Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

The publication outlines that the affordability of property in the current economic climate is the basis for the decline in home ownership. As a result, there is a growing number of households paying a greater proportion of their incomes on accommodation which has subsequent impacts on their quality of life and their ability to save.

The proposed Shared Living scheme would provide affordable residential accommodation in a core urban area with a high demand for housing. The 198 No. suites (182 No. single occupancy rooms, 4 No. accessible rooms and 12 No. double occupancy rooms) would directly address the evident housing need, responding proportionately to the pillars as set out above (particularly addressing Pillars 3 and 4 of this Action Plan).

The affordability of the shared living accommodation typology will ensure that the residents will have a higher disposable income which will benefit the local area and will also allow people to save deposits to eventually buy their own home. It has been demonstrated that the proposed development is consistent with the policy guidance of the *Action Plan for Housing and Homelessness, Rebuilding Ireland*.

4.5 *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)*

The Urban Development and Building Heights Guidelines for Planning Authorities were adopted in December 2018. The Guidelines set out that a key objective of the NPF is to significantly increase the building heights and overall density of developments.

The Minister's foreword to the *Heights Guidelines, 2018* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas which is an unsustainable model. There is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The Guidelines are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards.

The Height Guidelines, 2018 denote that the 'Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.' The Guidelines also note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and it notes that the planning process must actively address how this objective will be secured.

The *Height Guidelines* expressly seek increased building heights in urban locations:

*'In relation to the assessment of individual planning applications and appeals, it is Government policy that **building heights must be generally increased in appropriate urban locations**. There is therefore a **presumption** in favour of buildings of **increased height in our town/city cores and in other urban locations with good public transport accessibility**.'* [Our Emphasis]

The application proposes a part 1 to part 5 No. storey over basement Shared Living Development in 1 No. block in addition to a single storey bin store, which is considered to be appropriate within the surrounding context having regard to the location of the subject site within an existing urban area which is well served by public transport with many bus stops located in close proximity to the subject site in addition to Castleknock Train station c. 350 metres to the south-west (as the crow flies) and c. 550 metres / 7 No. minutes walking distance and the various employment locations and services and facilities accessible by foot and by bike.

We note that a 4 No. storey scheme was previously granted in 2017 however it is considered appropriate to propose an additional storey on foot of the introduction of the National Planning Framework and the Height Guidelines which encourages increased height and density on appropriate sites. It is considered that the design response provided strikes a balance between respecting the planning parameters of the extant scheme and ensuring the development potential of a strategically positioned underutilised plot is maximised.

4.5.1 Specific Planning Policy Requirement 3

SPPR₃ of the Building Height Guidelines sets out that:

'It is a specific planning policy requirement that where;

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria [below]; and*
2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.'

We note the provisions of 'Objective BLANCHARDSTOWN 1' of the *Fingal Development Plan 2017 – 2023* (discussed in Section 6 of this Report) which states that it is an objective to prepare an urban framework plan for Blanchardstown Village to guide future development. However, no urban framework plan in accordance with this objective has been prepared and there is currently no timeframe in place for the preparation of this Urban Framework Plan. However as increased heights are proposed at the subject site, we have demonstrated how the proposed development satisfies the specified criteria set out in Section 3 of the Height Guidelines as follows:

Development Management Criteria	
At the Scale of the Relevant City/ Town	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i> 	<ul style="list-style-type: none"> <i>The accessibility of the subject site via public transport has been extensively detailed in the TOC Planning Report and at various stages of this Statement of Consistency Report submitted with this Strategic Housing Development planning application (Castleknock Train station and bus services).</i>
<ul style="list-style-type: none"> <i>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake landscape and visual assessment (LVIA), by a suitably qualified practitioner such as a chartered landscape architect.</i> 	<ul style="list-style-type: none"> <i>It has been detailed in Architect's Design Statement and TOC documents how the development will be assimilated into its surrounding context. We note that the subject site is not located within an architecturally sensitive area and is not surrounded by any unique locational characteristics, having regard to its position fronting the Old Navan Road and adjacent to typical low-density housing. The proposed development has been designed generally within the parameters of the previously granted residential</i>

	<p>scheme at the subject site (FCC. Reg. Ref. FW16A/0079 and ABP Ref. PLo6F.248037).</p> <ul style="list-style-type: none"> • An LVIA and Daylight /Sunlight Analysis have been carried out which demonstrate that no material impacts will occur.
<ul style="list-style-type: none"> • On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape. 	<ul style="list-style-type: none"> • We note that the scheme provides access to the public park to the north-east at 2 No. locations along the north-eastern boundary which will enhance connectivity and permeability within the surrounding area. • We note that the appropriate setbacks have been provided at second, third and fourth floor levels ensuring that the scheme can be appropriately assimilated into the surrounding area. The higher elements are provided towards the centre of the site where they will have minimal impacts on surrounding properties, with the scale and massing stepping down towards the edges of the site. The high quality design including a palette of simple materials will allow the scheme to successfully integrate the surrounding area.

Development Management Criteria	
At the scale of District/ Neighbourhood / Street	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape. 	<ul style="list-style-type: none"> • The high quality design of the proposed development and considered setbacks provides an appropriate transition between the neighbouring dwellings and the subject proposal having regard to clear guidance provided in national planning policy which seeks the densification of brownfield, infill sites in close proximity to significant employment locations and public transport such as the subject site. We submit that no material impacts on residential amenity will occur as a result of the proposed development, having regard to the positive results of the Daylight Assessment and the LVIA. The high quality materials utilised in the scheme ensures that the scheme, whilst

	<p><i>changing the existing very low density character, will make a positive contribution to the streetscape. The provision of 2 No. accesses to the public park to the north-east will encourage connectivity and permeability for the residents, which will create a sense of place.</i></p>
<ul style="list-style-type: none"> <i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</i> 	<ul style="list-style-type: none"> <i>We note that the scheme provides large setbacks at second, third and fourth floor levels. For example, the scheme provides setbacks ranging from c. 25 No. metres – 40 No. metres from the dwellings along Talbot Court to the south-east and setbacks ranging from c. 22 No. metres – 43 No. metres from dwellings along Talbot Downs. We note that subsequent to the pre-planning consultation meeting with An Bord Pleanála, the building was set back at second floor level by an additional 6.63 m and by an additional 3.43 m at third and fourth floor levels from the rear of properties along Talbot Court.</i>
<ul style="list-style-type: none"> <i>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)".</i> 	<ul style="list-style-type: none"> <i>We note that the scheme will provide active surveillance of the public park to the north and will also provide 2 No. access points onto this park for residents to utilise, therefore enhancing the urban design context for public spaces.</i>
<ul style="list-style-type: none"> <i>The proposal makes a positive contribution to the improvements of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i> 	<ul style="list-style-type: none"> <i>The high quality design of the scheme will ensure the development will be a legible and attractive addition to the area. As previously noted, the access provided onto the public park will contribute towards enhancing the legibility of the scheme within its context.</i>
<ul style="list-style-type: none"> <i>The proposal positively contributes to the mix of uses and/ or building / dwelling typologies available in the neighbourhood.</i> 	<ul style="list-style-type: none"> <i>As set out in the Justification Report prepared by Thornton O'Connor Town Planning, Shared Living is a housing typology to be encouraged in Ireland. The site has the potential to provide an accommodation typology that is lacking in the local area, a typology that is specifically targeted towards workers that may be</i>

	<p>unable to afford the sparse rental options available in the local area and persons that may prefer to live in a designed environment that provides social interaction spaces. Having regard to the significant employment locations such as Connolly Hospital, Dublin Enterprise zone and Blanchardstown Centre located in close proximity to the site it is clear that the Shared Living typology is appropriate for the subject lands.</p>
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Development Management Criteria	
At the Scale of the Site/ Building	
Assessment Criteria	Comment
<ul style="list-style-type: none"> The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. 	<ul style="list-style-type: none"> The Daylight/Sunlight Analysis notes that all of the individual bedroom suites at basement level comfortably meet the BRE guidelines on average daylight factor which indicates that rooms on subsequent floor levels will also meet the guidelines. The Report also concludes that the proposed development will not result in any significant impact on level of daylight or sunlight to surrounding properties.
<ul style="list-style-type: none"> Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and an effective urban design and streetscape solution. 	<ul style="list-style-type: none"> As noted above, the Daylight/Sunlight Assessment ultimately concludes that no material impacts will occur on neighbouring properties. The Report also notes that the future occupants will have access to external amenity areas with good level of sunlight throughout the year and all private habitable rooms and communal multi purposed rooms will receive adequate levels of daylight through-out the development. The only instance where the BRE Guidelines are not met is in respect of the ground floor courtyard. However, we note that a public park is located adjacent to the site to the north-east and a second courtyard is provided at basement in addition to a roof terrace at third floor ensuring a high level of outdoor amenity space is provided for residents to utilise.

Development Management Criteria	
Site Specific Assessments	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measurements to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</i> 	<ul style="list-style-type: none"> • <i>These assessments are generally required when buildings are at least 30 No. metres in height. Therefore, as the subject proposed building has a maximum height of c. 17.575 m, this assessment is not required.</i>
<ul style="list-style-type: none"> • <i>In development locations in proximity to sensitive bird and/ or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/ or collision.</i> 	<ul style="list-style-type: none"> • <i>The AA Screening Report prepared by Moore Group has found that the Project, alone or in combination with other projects, is not likely to have significant effects on the European sites considered in this assessment.</i>
<ul style="list-style-type: none"> • <i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i> 	<ul style="list-style-type: none"> • <i>N/A</i>
<ul style="list-style-type: none"> • <i>An assessment that the proposal maintains safe air navigation.</i> 	<ul style="list-style-type: none"> • <i>N/A</i>
<ul style="list-style-type: none"> • <i>An urban design statement including, as appropriate, impact on the historic built environment.</i> 	<ul style="list-style-type: none"> • <i>A Design Statement prepared by Todd Architects has been submitted with the application. The principle of demolishing the existing public house building was established previously at the subject site.</i>
<ul style="list-style-type: none"> • <i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i> 	<ul style="list-style-type: none"> • <i>An AA screening report and Environmental Report has been submitted with the application.</i>

4.6 *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines Planning Authorities 2018*

4.6.1 Introduction

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments* in March 2018.

The purpose of the 2018 Apartment Guidelines is to reiterate ministerial guidance, setting out standards for apartment developments, mainly in response to circumstances that had arisen whereby some local authority standards were at odds with national guidance. These Guidelines build on the content of the 2015 Apartment Guidelines particularly in relation to design quality safeguards such as internal spaces standards for 1, 2 and 3 No. bedroom apartments, floor to ceiling height, internal storage and amenity space.

These Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply and projected need for additional housing supply out to 2020, the Government's *Rebuilding Ireland – Action Plan for Homelessness, 2016* and the *National Planning Framework – Ireland 2040*, published since the 2015 Guidelines. We note that the Apartment Guidelines take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

Section 5.13 of the *Guidelines* set out that 'a new format of residential accommodation described as 'Shared Accommodation' has the potential to emerge as a distinct segment within the overall urban accommodation sector'.

Therefore, we consider that the densification of this urban, brownfield, infill site to provide a high-quality Shared Living scheme of 210 No. bedspaces will contribute towards allowing shared living to emerge as its own segment within Dublin.

It is considered that the subject site is located within a central and accessible urban location as set out in the Apartment Guidelines, which states:

'Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- *Sites within walking distance (i.e. up to 15 minutes or 1,000 – 1,500m), of principal city centres, or **significant employment locations, that may include hospitals and third-level institutions.***

The subject site is located either within 15 minutes or 1,500 metres of numerous substantial employment locations including Connolly Hospital, Dublin Enterprise Zone and Blanchardstown Town Centre, therefore can be described as a central and accessible urban location.

In terms of meeting future housing need the publication sets out that 'demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2-

person, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type'. Furthermore, the 2016 Census indicates that 'if the number of 1-2-person dwellings is compared to the number of 1-2-person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2- person households as there are 1-2-person homes.'

The Apartment Guidelines recognises the need for alternative types of accommodation to facilitate the societal and economic changes which would be better suited to reflect household formation and housing demand. The proposed application comprising 210 No. Shared Living bedspaces will therefore provide an alternative housing accommodation type for people seeking residential accommodation in Dublin, which is not currently available.

Specific Planning Policy Requirement 7 and Specific Planning Policy Requirement 9 are relevant to the proposed Shared Living scheme.

4.6.2 Specific Planning Policy Requirement 9

The Apartment Guidelines set out under SPPR 9 that Shared Accommodation may be provided and shall be subject to the requirements of SPPR 7 (as per Build to Rent). In addition,

- (i) **No restrictions on dwelling mix shall apply;**
- (ii) **The overall unit, floor area and bedroom floorspace requirements of Appendix 1 of these Guidelines shall not apply and are replaced by Tables 5a and 5b;**
- (iii) **Flexibility shall be applied in relation to the provision of all storage and amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities. The obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;**
- (iv) **A default policy of minimal car parking provision shall apply on the basis of shared accommodation development being more suitable for central locations and/or proximity to public transport services. The requirement for shared accommodation to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.**

A recent decision by An Bord Pleanála to grant permission for a Shared Living Scheme at the Old School House, Eblana Avenue, Dún Laoghaire, Co. Dublin [ABP Ref. ABP-304249-19] has informed the layout of the proposed Shared Living scheme at the subject site, particularly in relation to the provision of living/kitchen/dining spaces.

Having regard to the decision, an assessment of the scheme's compliance with SPPR 9 is set out below:

Table 5a (within SPPR9)

We note that the Guidelines state that each of the bedrooms are required to be ensuite and provide minimum bedroom size standards, referred to in Table 5a as follows:

Table 5a: Shared Accommodation – minimum bedroom size (including ensuite)	
Single	12 sq m
Double/twin	18 sq m

The Shared Living scheme subject to this application comprises 182 No. single occupancy ensuite bedrooms measuring 16 sq m, 4 No. accessible bedrooms measuring 23.5 sq m and 12 No. double occupancy rooms measuring 18 sq m, providing a total of 210 No. bedspaces.

As the typical Niche Living suites are 16 sq m, they are 4 sq m (or 33%) above the standard set out in Table 5a for single occupants, i.e. 12 sq m. We also note that 2 No. double occupancy bedrooms are being provided at 18 sq m which is in line with minimum standards and will allow choice in tenure for future residents.

The rationale behind the larger room size beyond that prescribed in the Apartment Guidelines is the multifunctional capability of the room space which enhances the provision of in-room sharing for small scale socialising on a more intimate scale such as playing computer games and sharing a coffee or a meal etc.

Table 5b (within SPPR9)

Table 5b of the Apartment Guidelines set outs that minimum common living and kitchen facilities floor area should be provided as follows:

Table 5b: Shared Accommodation minimum common living and kitchen facilities floor area	
Bedroom 1-3	8 sq m per person
Bedroom 4-6	Additional 4 sq m per person

The minimum floorspace extent of the common shared area for common living and kitchen facilities has been calculated on a per bedspace basis in line with the An Bord Pleanála decision in relation to a Shared Living scheme at Old School House, Eblana Avenue, Dún Laoghaire, Co. Dublin [ABP Ref. ABP-304249-19].

The granted scheme reduced the number of bedspaces from 208 No. to 204 No. by including the following condition:

2(a): The living room/library area on the 1st, 2nd, 3rd and 4th floors shall be enlarged to also incorporate the immediately adjacent 'shared living suite'.

We note that the size of the rooms containing a kitchen facility were considered acceptable by An Bord Pleanála as no condition was attached regarding the increase of these room sizes. The increase only relates to the other specific living/library areas on the 1st, 2nd, 3rd and 4th floors. Having regard to this decision, the following living/kitchen/dining room sizes were

granted at Eblana Avenue at each individual floor level (which includes the increased size of the living/library rooms required by condition):

Eblana Avenue Scheme	No. of bedspaces granted	Sq m of Common Living/Kitchen/Dining Space Granted on Each Level	Sq m Per Person
Floor Level			
Lower Ground	10	34.5	3.45
Ground	26	60.75 + 24.1 [84.85]	3.26
First	39	60.75 + 41.1 [101.85]	2.61
Second	41	60.75 + 40.9 [101.65]	2.48
Third	39	60.75 + 39.7 [100.45]	2.58
Fourth	37	60.75 + 39.7 [100.45]	2.7
Fifth	12	48.25	4.02
Total	204	572	2.8

The following table sets out the quantum of communal kitchen/dining/living space provided as part of the proposed development:

Proposed Development	No. of bedspaces proposed	Sq m of Common Living/Kitchen/Dining Space Granted	Sq m Per Person
Floor Level			
Basement	14	63.6	4.54
Ground	46	58.7 + 53.3 [112]	2.43
First	59	60 + 54.5 + 70.1 [184.6]	3.12
Second	48	60 + 54.5 + 70.1 [184.6]	3.84
Third	25	130	5.2
Fourth	18	110	6.1
Total	210	784.8	3.73

As shown in the tables above, the average communal living/kitchen/dining space provided in the proposed development is 3.73 sq m per person whereas the granted scheme at Eblana Avenue provides an average of 2.8 sq m per bedspace. Therefore, this demonstrates that the average quantum of common living/kitchen/dining room area per bedspace provided in the subject scheme is higher than granted in the Eblana Avenue development. We also note that the proposed development provides 3 No. living/kitchen/dining rooms at first and second floor levels which will provide additional choice of space for residents.

In summary, the quantum and quality of the communal living/kitchen/dining rooms proposed within the subject scheme will ensure a comfortable living environment for the future residents.

4.6.3 Specific Planning Policy Requirement 7

SPPR9 states that Shared Accommodation may be provided and shall be subject to the requirements of SPPR7 (as per Build-To-Rent) which sets out as follows:

BTR development must be:

- (a) *Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;*
- (b) *Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:*
 - (i) *Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.*
 - (ii) *Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.*

In response to part b (ii) of SPPR 7 the scheme provides additional communal amenity spaces at ground and basement level in addition to the fourth and fifth floor levels to encourage social integration between residents in line with Section 5.17 of the Guidelines:

'A key feature of successful Shared Accommodation schemes internationally is the provision of wider recreation and leisure amenities as part of the overall development. Residents enjoy access to sports and recreation facilities that are dedicated for use by the residents only and have the opportunity to experience a shared community environment among residents of the scheme.'

SPPR7 defines resident amenities as:

'comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work /study spaces, function rooms for use as private dining and kitchen facilities, etc.'

In essence, resident amenity spaces can be classed as any space that residents can carry out any recreational activity which includes external roof garden spaces or outdoor terraces.

These communal spaces define the unique characteristics of Shared Living and distinguish it from other more traditional residential accommodation formats. In addition, these communal resident amenity areas support this format of accommodation as being preferential to the more traditional cluster format of standardised kitchen and sitting/living rooms. The Niche Living format will provide an enhanced overall standard of amenity for residents, which is clearly demonstrated in the Niche Living documentation submitted with this application. The Table below sets out how the Niche Living format complies with Section 5.17/SPPR7 of the Apartment Guidelines:

Amenities	Total sq m	Sq m per person
Basement		
Cinema Room	85	
Ground Floor		
Lounge/Reception	101	
Gymnasium/Fitness Space	99.1	
Third Floor		
Communal Library/Study Space	30	
Fourth Floor		
Communal Private Dining Space	23.5	
External Amenity Space		
Roof Terrace (Third Floor)	78	
Ground Level	336	
Basement Level	170	
Total Amenity	922.6	4.4

As demonstrated in the table above, the proposed development will provide **922.6 sq m of high quality amenity space which equates to 4.4 sq m per person (internal and external amenities)** in addition to the living/kitchen/dining rooms provided at each level.

Based on the provision of 210 No. bedspaces, this equates to the provision of 4.4 sq m of amenity space per Shared Living unit. It is considered that the provision of 922.6 sq m of amenity space per resident in addition to the communal living/kitchen/dining spaces outlined in Section 4.6.2 will provide a very enjoyable living space for the Shared Living residents.

In response to part b (i) of SPPR7, in addition to communal living/kitchen/dining spaces and internal and external amenity spaces proposed, the scheme provides resident facilities listed below:

- Launderette (33.7 sq m)
- Linen Room (25.5 sq m)
- Bin Store (40.7 sq m)
- Bicycle Storage (245 No.)
- Common WC/ Stores (13.8 sq m)

Furthermore, intangible resident facilities in the form of Spike Global software will be provided to occupants of the development that will support everything from access control, logging and tracking facilities issues, to clubs, events and building a cohesive community through engagement and social interaction.

It is noted that regular cleaning and maintenance of the private suites and wider communal area is provided as detailed in the Niche Living Operational Plan prepared by Bartra and is submitted in support of this planning application.

The subject Shared Living scheme is fully in accordance and consistent with the standards set out in the recently updated and adopted *Apartment Guidelines, March 2018*.

4.7 *Urban Design Manual – A Best Practice Guide (2009)*

Housing Location in Urban Areas

The Urban Design Manual sets out 12 No. key indicators for developments in urban areas;

1) Context – How does the development respond to its surroundings?

The proposed development has been subject to a high-quality design by Todd Architects having regard to the previously granted apartment scheme at the site. The scheme has been developed generally within the external footprint of the extant permission however has introduced a block form in order to appropriately densify the site on foot of the introduction of the National Planning Framework and the Building Height Guidelines. This innovative and creative design will add interest to the streetscape and will be managed appropriately to ensure the amenity of the future residents and the local area will be protected. The proposal includes 2 No. access gates to the public park along the north-eastern boundary (1 No. adjacent to the gymnasium and 1 No. external to the building) ensuring that this open space will be utilised by future residents.

Todd Architects note in their Design Statement enclosed that various plan forms for the proposed Shared Living development were considered throughout the initial design stage, but have mainly been significantly influenced by the form of the residential permission recently granted on the site. A key feature of that permission was that the profile of the elevation and sections responded sensitively to surrounding residential

2) Connections – How well connected is the new neighbourhood?

The proposed development encourages sustainable modes of transport by providing zero car parking and including 245 No. bicycle parking spaces (including 12 No. bleeper bike spaces) in addition to 2 No. car share parking spaces.

As previously noted, the site is located within walking and cycle distance of major employment centres in the surrounding area including Connolly Hospital, the Dublin Enterprise Zone and Blanchardstown Town Centre. We note that full details are set out in the Justification Report enclosed with this planning application.

The site is well served by public transport with Castleknock Train Station located within c. 550 metres walking distance of the site (7 No. minutes) and various bus stops which provide easy access to locations such as Blanchardstown Shopping Centre (No. 17a) and Ongar Village (39a) from the N3 Navan Road and Dublin City Centre (No. 38a and No. 39 from Navan Road, No. 179 from Connolly Hospital and No. 38 from the R806 Castleknock Road).

It is clear that the site is well connected and sustainable modes of transport are encouraged within the proposed scheme.

3) Inclusivity – How easily can people use and access the development?

As previously noted, the proposed development has been designed to encourage sustainable modes of transport e.g. walking, cycling and public transport. In addition, the scheme facilitates a safe drop-off in/out lay-by for delivery vehicles and taxi-drop off etc.

The Traffic and Transport Design Statement prepared by CS Consulting notes that *'the entry and exit radii from/to the public road have been designed in accordance with DMURS'*. The site layout will also allow efficient refuse collection within the site itself avoiding any obstruction of the public road or footpath and emergency vehicles can also safely access the site.

The main pedestrian entrance to the scheme is provided from the front of the site through the ground floor courtyard area. A pedestrian link has been provided through the ground floor of the building adjacent to the gymnasium to provide access to the public park to the rear in addition to a second access point external to the building on the north-eastern boundary. The development provides 4 No. accessible bedrooms and the scheme in general has been designed to provide access for all persons.

4) Variety – How does the development promote a good mix of activities?

The development provides 210 No. bedspaces within the proposed Shared Living scheme, which directly responds to the need for this type of tenure predominately by the young professional cohort of the population who cannot afford alternative types of accommodation. The proposed scheme provides for communal and recreational amenities within the confinements of the development such as a gymnasium, cinema room, lounge/reception, library/study and private dining room in addition to outdoor residential amenity spaces therefore ensuring that a wide variety of amenities are available for future residents to utilise within the development.

5) Efficiency – How does the development make appropriate use of resources, including land?

National policy expressly seeks the densification of suburban, brownfield, infill sites such as the subject site. The application site is currently an underutilised brownfield site in an accessible location in Dublin in close proximity to employment locations and public transport.

The proposed development will result in Plot Ratio of 1.8 and a Site Coverage of 59% which represents the appropriate densification of this underutilised site while having regard to the need to protect the amenity of surrounding properties.

6) Distinctiveness – How do the proposals create a sense of place?

As set out in the Design Statement by Todd Architects which is enclosed as a separate document, the front elevation of the building presents a 'stepped' façade to the Old Navan Road with the different volumes articulated by contrasting external finishes. The height of the proposed development reduces at its eastern and western ends. This reduction in scale is designed to eliminate any overshadowing or visual dominance when viewed from the adjoining private residences.

The windows are large in scale relative to the dimensions of the rooms in order to ensure that natural daylight is optimised and that a feeling of "generosity" and "spaciousness" is evident in the rooms.

The scheme will also provide passive overlooking of the park to the north (for example large windows are overlooking the park from the gymnasium and some communal living/kitchen/dining rooms). The provision of high-quality internal and external resident amenity spaces will ensure a sense of community is achieved among the future residents.

7) Layout – How does the proposal create people friendly streets and spaces?

The main pedestrian access to the scheme from Old Navan Road through the ground floor residential amenity space ensures that an active street frontage will be provided. In addition, there is a pedestrian pathway proposed through the ground floor of the scheme providing access to the public park to the rear which is considered a significant planning gain in addition to a second gate access external to the scheme on the north-eastern boundary.

The proposal is designed to adhere to the provisions set out in the *Design Manual for Urban Roads and Streets (2013)*.

As previously mentioned the scheme encourages walking and cycling and the use of public transport, therefore the scheme will provide an active and passive space along Old Navan Road.

8) Public Realm – How safe, secure and enjoyable are the public areas?

The outdoor residential amenity spaces will be subject to a high level of passive surveillance as they will be overlooked by Shared Living suites, ensuring that these areas are safe and secure.

A comprehensive Landscape Plan and Landscape Report prepared by The Big Space are enclosed which demonstrate that the site will be enclosed with a 1,800 mm plinth wall and railing on the north-eastern boundary and part of the north-west boundary, an 1,800 mm brick wall with capping along the north-western boundary adjacent to the ground floor courtyard and a 600 mm plinth wall along a small portion of the north-western boundary and the south-western boundary ensuring that these public areas within the scheme will be secure and safe for residents to enjoy.

9) Adaptability – How will the buildings cope with change?

The nature of the proposed Shared Living development is unique although the scheme could be easily adapted to a hotel or student accommodation with the benefit of planning permission.

10) Privacy and Amenity – How does the scheme provide a decent standard of amenity?

Each individual unit has an ensuite and is equipped with basic cooking facilities. The contemporary design provides for a versatile private living and sleeping space. In addition, there are communal living/kitchen/dining rooms located at each floor level to serve the residents of each floor. The proposed scheme also provides communal amenity spaces such as a gymnasium, lounge/reception area, cinema room, library /study and a private dining room in addition to external residential amenity spaces at ground, basement and at third floor level ensuring a high quality standard of living for the residents of this proposed Shared Living Scheme.

11) Parking – How will the parking be secure and attractive?

Having regard to the nature of the use proposed, the typical residents who are in-situ short-medium term and the location of the site within walking/cycle distance to significant employment locations and excellent public transport, it is not intended to provide on-site car-parking. Sustainable modes of transport such as walking, cycling (245 No. bicycle parking spaces provided) and public transport are promoted within the scheme. The development provides for 2 No. car share parking spaces, a drop off lay-by and a delivery bay to ensure that taxis, refuse collection and service vehicles can safely enter and exit the site for example.

12) Detailed Design: How well thought through is the building and landscape design?

A detailed Design Statement prepared by Todd Architects is submitted as part of the application which sets out the design rationale of the proposed development providing a high-quality innovative scheme.

We submit that the proposed Shared Living scheme is consistent with the guidance set out in the *Urban Design Manual – A Best Practice Guide (2009)*.

4.8 *Design Manual for Urban Roads and Streets (2013)*

The *Design Manual for Urban Roads and Streets* (DMURS) sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

4.8.1 Policy Background

The *Design Manual for Urban Roads and Streets* references the *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document which was published by the Department of Transport. The key goals set out within this document include:

- (i) To reduce overall travel demand;
- (ii) To maximise the efficiency of the transport network;
- (iii) To reduce reliance on fossil fuels;
- (iv) To reduce transport emissions; and
- (v) To improve accessibility to public transport.

Given the accessible location of the application site in proximity to significant employment locations such as Connolly Hospital, the Dublin Enterprise Zone and Blanchardstown Town Centre, it is projected that tenants of the scheme would rely on walking, cycling or utilising existing public transport routes to reach their place of work. The proposed development encourages sustainable modes of transport by providing zero car parking and including parking facilities for bicycles in addition to 2 No. car share parking spaces. The scheme is therefore considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009 – 2020*.

4.8.2 Site Layout and Legibility

The proposed development has been designed generally within the parameters of the previously granted residential scheme at the subject site (FCC Reg. Ref. FW16A/0079 and ABP Ref. PLo6F.248037). By positioning the main pedestrian entrance to the front of the site from the Old Navan Road this leads the pedestrian through the outdoor resident amenity space or 'courtyard' before arriving at the reception entrance. Therefore, the site encourages permeability throughout the scheme and contributes towards providing an active streetscape.

A pedestrian link has also been provided through the ground floor of the building to provide access to the public park to the rear in addition to a second access gate along the north-eastern boundary external to the building. The proposed pedestrian link will connect the application site internally to the park and contribute to the integration of the scheme within the surrounding area.

A drop-off lay-by has been provided to the front of the site off Old Navan Road in addition to a delivery bay and 2 No. car share parking spaces area to ensure that taxi drop-off/refuse collection and service vehicles for example can safely enter and exit the site. As previously stated, the Traffic and Transport Design Statement prepared by CS Consulting notes that:

'the entry and exit radii from/to the public road have been designed in accordance with DMURS. The proposed internal development service road and the proposed development access arrangements have been assessed to show that these will accommodate the required movements of a refuse vehicle and of emergency vehicles (such as a fire tender and ambulance).'

The proposed high-quality designed layout of the scheme by Todd Architects and the use of two contrasting external materials to articulate the different volumes (clay facing brick and a dark self-coloured cementitious render) will ensure that the scheme will be legible in the streetscape while also sitting comfortably within its immediate context. We note that the development has been designed in accordance with DMURS.

4.8.3 Sustainable Transport

The subject site is well served by public transport with many bus stops located in close proximity to the subject site providing easy access to locations such as Blanchardstown Shopping Centre and employers such as eBay (No. 17a) and Ongar Village (39a) from the N3 Navan Road and Dublin City Centre (No. 38a and No. 39 from Navan Road, No. 179 from Connolly Hospital and No. 38 from the R806 Castleknock Road). Castleknock Train Station is located c. 350 metres (as the crow flies) to the south-west of the site (550 No. metres / 7 No. minutes walking distance) which facilitates easy access to locations such as Dublin Connolly Station, Pearse Station, Longford, Sligo, Maynooth and M3 Parkway.

As previously noted, the application is submitted with a Mobility Management Plan, which notes that public transport information will be supplied in the Development Access Map, Sustainable Travel Pack and Travel Information Points in addition to information regarding the bus and train services that accept standard or folding bicycles.

The DMURS publication references that the Smarter Travel document includes a *'vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips'*.

The proposed scheme provides for 245 No. bicycle parking spaces located at ground and basement floor levels ensuring the sustainable modes of transport are encouraged.

As established in the above commentary, it has been demonstrated that the proposed Shared Living scheme is consistent with the guidance as per the *Design Manual for Urban Roads and Streets (2013)*.

4.9 *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*

The Planning System and Flood Risk Management Guidelines (2009) published by the Government of Ireland sets out the core objectives of the Guidelines which are to:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The Site Specific Flood Risk Assessment has been prepared by CS Consulting which demonstrates no risk of flooding having regard to the location of the site in Flood Zone C. The report concludes the following:

- The site historically has no recorded flood events as noted in the OPW's flood maps. The Fingal County Council's Strategic Flood Risk Assessment Maps has indicated that the subject lands are located outside the 0.1% AEP Zone.
- Predicted flood mapping for pluvial / tidal & fluvial flood events will not affect the subject lands.
- The proposed development will have a storm water attenuation system to address a 1 in 100 year extreme storm events increased by 20% for predicted climate change values. This will significantly reduce the volume of storm water leaving the site during extreme storms which in turn will have the effect of reducing the pressure on the existing public drainage system.
- The likelihood of onsite flooding from the hydrogeological ground conditions are deemed to be minor and within acceptable levels.

The Flood Risk Assessment prepared by CS Consulting for the application site concludes that there are no flood risk concerns at the subject site. Therefore, the proposed development is acceptable having regard to the objectives of *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

5.0 REGIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* and *Regional Spatial and Economic Strategy for the Eastern and Midlands Region*.

5.1 *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*

The *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* (RPGs) provides a long term sustainable planning framework for the GDA. The Regional Planning Guidelines (RPGs) is a policy document which aims to direct the future growth of the Greater Dublin Area over the medium to long term.

The RPGs set out that *'quality housing should be reflected equally in terms of the overall layout of the scheme and its urban design characteristics, the internal layout, form and design of housing and the external architectural form of housing which should relate to the wider urban area of which it is part while facilitating the creation of areas of distinct character.'*

Blanchardstown is noted as a Metropolitan Consolidation Town and these areas are described as *'strong active urban places within metropolitan areas with **strong transport links**'*. These towns are located close to Dublin City and should continue to be developed at a relatively large scale as part of the consolidation of the metropolitan area.

The following Strategic Policies are considered relevant and have been assessed in respect of the proposed development:

Strategic Policy EP1 outlines the importance of the integration of climate change considerations into Development Plans, Flood Risk Assessments and Biodiversity and Heritage plans.

The proposed development has had due regard to climate change, flood risk and biodiversity. An Environmental Report prepared by Thornton O'Connor Town Planning is submitted with the application, in addition to a number of technical reports on specific environmental issues. Therefore, the proposal is consistent with Strategic Policy EP1.

Strategic Policy EP2 refers to the need to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long-distance commuting.

The proposed Shared Living Scheme will contribute towards alleviating the current housing crisis. The availability of affordable, high quality and suitable tenure will allow employees to live closer to their place of work and reduce unsustainable commuting distances.

Strategic Policy SP1 stipulates that the delivery of new housing in the Greater Dublin Area shall support the NSS, Smarter Travel and the DoEHLG Guidelines on Sustainable Residential Development. The RPG Settlement Strategy encourages the focusing of new housing development on:

- (i) *consolidation within existing built footprint with particular focus on the metropolitan area;*
- (ii) *supporting the achievement of sustainable towns;*
- (iii) *supporting national investment in public transport services by focusing new development areas to key locations to achieve the integration of land use and high quality public transport provision; and*
- (iv) *build up economics of scale for services in identified growth towns.*

The proposed scheme will positively address each of the criteria set out above. As noted previously, the proposed development will represent the densification of a brownfield infill site in a sustainable urban location and will promote the use of sustainable modes of transport. The development will also provide a population density to support existing facilities and services in the Blanchardstown area.

The scheme is considered to be consistent with Strategic Policy SP1.

Strategic Policy PIP5 relates to waste management and aims to ensure environmental, business and public health needs are met. It also sets out to promote and facilitate reuse and recycling.

An Outline Demolition and Construction Waste Management Plan (ODCWMP) has been prepared by CS Consulting and an Operational Waste Management Plan (OWMP) has been prepared by AWN Consulting and are enclosed as part of this application as supporting technical documents.

The ODCWMP notes that the following measures are proposed to ensure effective management of construction waste at the development site, to maximise recycling of construction waste, and to minimise the environmental impact of construction waste:

- On-site segregation of all waste materials into appropriate categories.
- All waste material will be stored in skips or other suitable receptacles in a designated waste storage area on the site.
- Wherever possible, left-over material (e.g. timber cut-offs) and any suitable demolition materials shall be reused on or off site.
- Uncontaminated excavated material (top-soil, sub-soil) will be reused on site in preference to the importation of clean fill, as soil to be reused or removed from site must be tested to confirm its contamination status and subsequent management requirements.
- All waste leaving the site will be transported by a suitably licensed/permitted contractor and taken to a licensed/permitted facility.
- All waste leaving the site will be recorded and copies of relevant documentation retained.

The ODCWMP notes in summary that:

'with a high level of due diligence carried out at the site, it is envisaged that the environmental impact of the construction phase of the proposed development will be of small scale and short duration, with respect to waste management.'

The OWMP notes that the waste strategy complies with all legal requirement waste policies and best practice guidelines and the *'implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development'*.

The proposal is therefore consistent with Strategic Policy PIP5.

Strategic Policy GIP2 aims to protect and conserve the natural environment, in particular EU designated sites.

The site is not located on or in close proximity to any EU designated sites. The Appropriate Assessment Screening Report enclosed states that *'there will be no potential for significant effects on any European site'*.

The proposal is consistent with Strategic Policy GIP2.

Strategic Policy GIP6 sets out to ensure the protection, enhancement and maintenance of the natural environment with specific emphasis on the value of green spaces.

A pedestrian link has been provided through the ground floor of the building to provide access to the public park to the rear. The proposed pedestrian link will connect the application site internally to the park and contribute to the integration of the scheme within the surrounding area. The scheme will also provide passive overlooking of the park. Therefore, the natural environment and in particular the value of the park to the rear has been key tenet to the design schematic.

The proposal is consistent with Strategic Policy GIP6.

Strategic Policy SIP1 is in relation to planning for communities and outlines the need to identify and respond to the most vulnerable in planning for growth, for change or regeneration.

The proposed scheme responds to the need for an alternative accommodation typology in the Blanchardstown area which will provide short-medium term accommodation predominately for young professionals who do not have the financial means to purchase suitable tenure, pay the increasing rental prices or who are located in the area for a short period of time i.e. contract work or internships.

The proposal is consistent with Strategic Policy SIP1.

Strategic Policy SIP2 acknowledges planning policy as a tool in creating a quality of life.

The Shared Living scheme providing 210 No. bedspaces combines high quality communal spaces with a high function, high quality private suite with all aspects of day-to-day life taken care of within the monthly cost, including accommodation, all utilities and taxes, high speed internet access, full access to the gym, cinema room and all other communal spaces, an Events manager and access to social events, security, full cleaning and maintenance of the private suites and the wider communal areas, and the provision of bed linen and regular changing thereof. It is therefore considered that the proposal will provide for a high quality standard of residential amenity for the future occupiers. The scheme promotes sustainable modes of transport which will also benefit the quality of life of the tenants.

The proposal is consistent with Strategic Policy SIP2.

Strategic Policy FP1 states that flood risk requires active management throughout the planning process.

The proposal has had due regard of flood risk, it is noted that the application site is located within Flood Zone C. A Flood Risk Assessment has been prepared by CS Consulting for the application site which concludes that there are no flood risk concerns at the subject site.

The proposal is consistent with Strategic Policy FP1.

This section has clearly demonstrated that the proposed Shared Living scheme comprising 210 No. bedspaces is consistent with the relevant strategic policies set out the *Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022*.

5.2 **Regional Spatial and Economic Strategy for the Eastern and Midlands Region**

The *Regional Spatial and Economic Strategy* (or RSES) for the East and Midland Regional Assembly was adopted on 28th June 2019. From this document a number of core Regional Policy Objectives have emerged to work in concert with the National Planning Framework (NPF), and to guide all Local Authority future plans, projects and activities requiring consent of the Regional Assembly.

Under **RPO 4.3** 'Consolidation and Re-intensification' the following objective is stated:

'Support the consolidation and reintensification 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 coordinated with the delivery of key water infrastructure and public transport projects.'

The subject project will provide 210 No. Shared Living bedspaces with ancillary resident support facilities and amenities replacing the existing 1 – 2 No. storey public house/restaurant therefore appropriately densifying this brownfield site in an existing residential area in proximity to employment locations and public transport. Therefore, the proposed development will result in the intensification of a brownfield site in a built up area.

The *Metropolitan Area Spatial Plan (MASP) for Dublin* contained within the RSES states the following objective:

- **RPO 5.4:**

'Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines', and 'Urban Development and Building Heights Guidelines for Planning Authorities'.

As stated previously in this Statement of Consistency, the proposed development fully responds to National Planning Policy – refer to the following sections:

- Section 4.5 - 'Urban Development and Building Heights Guidelines for Planning Authorities
- Section 4.6 - 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines

The MASP notes the following objective **RPO 5.5**:

'Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.'

The subject site is contained within an established residential neighbourhood adjacent to key employment locations and high-quality public transport. Therefore, the proposed development represents consolidated growth on an infill/ brownfield site.

The RSES sets out the following in relation to 'Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking':

*'Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be achieved. This involves managing and facilitating the growth of Dublin and to increase the scale of our Regional Growth Centres to be able to provide the range of functions to their hinterlands. **This needs to be facilitated by appropriate, effective and sustainable infrastructure development in these centres, and at the same time avoid sprawl. This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure** - including broadband - in order to make the Region more connected and competitive. This will help to deliver high quality jobs that are well-paid and sustainable.'* [Our Emphasis]

The provision of the proposed Shared Living development close to major centres of employment including Connolly Hospital, the Dublin Enterprise Zone and Blanchardstown Town Centre allows for an agglomeration effect of young mobile workers and concentrations of infrastructure working in concert for the connected growth of Ireland's Economy. The clustering and interdependency of businesses in the surrounding area has been important to its continued growth, the next step to facilitate continued growth and maintaining Ireland's competitiveness is embracing adaptive residential rental models which respond to the evolving needs of the workforce.

Under **Section 8.1** the RSES states the following with regard to integrating land use and transport planning:

'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'

The subject development contributes to consolidated growth, the reduction in carbon emissions through lower parking standards (and provision of 245 No. bicycle parking spaces).

Through the provision of photovoltaic panels, high energy standards of construction, a (private) car free development and landscaping, the development also helps maintain a high standard of natural and green infrastructure within an intensified and more dense residential setting.

Under **Section 8.2**, the RSES discusses responses to urban sprawl and justification for the move towards compact growth:

*'The Strategy aims to provide a spatial framework **to promote smart compact growth** as an alternative to continued peri-urban sprawl around our cities and towns, with a resultant negative impact on the environment and people's health and wellbeing due to increased commuting and loss of family and leisure time.'*

The subject development seeks to provide a welcoming and attractive alternative to car dominated development, which is well located in proximity to significant employers and is locally and regionally accessible by foot and by bicycle.

Additionally, the provision of communal amenity spaces and facilities aides in the facilitation and promotion of healthy lifestyles and social cohesion between residents. Similarly, the location of this high density development close to public transport and proximate to major employers allows for reducing commuting time and greater work life balance for future residents.

The RSES **Objective RPO 9.4** has the following stated goal in relation to new apartment developments:

*'Design standards for new apartment developments **should encourage a wider demographic profile** which actively includes families and an ageing population.'* [Our Emphasis]

Currently the surrounding area is dominated by family housing of varying bedroom sizes. There is a significant lack of diversity in affordability amongst the existing housing stock and few examples of apartments in the immediate vicinity.

By providing a Shared Living development at this location, a wider demographic profile can be accommodated in the local area inviting opportunities for new workers and new residents to become part of the community.

6.0 LOCAL POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy and is consistent with the relevant policies and objectives as set out within the *Fingal Development Plan 2017 – 2023*.

6.1 *Fingal Development Plan 2017 – 2023*

6.1.1 Zoning

The subject site is zoned Objective 'RS' 'Residential' in the *Fingal Development Plan 2017 – 2023* where the stated aim is 'to provide for residential development and protect and improve residential amenity' (see Figure 6.1 below).

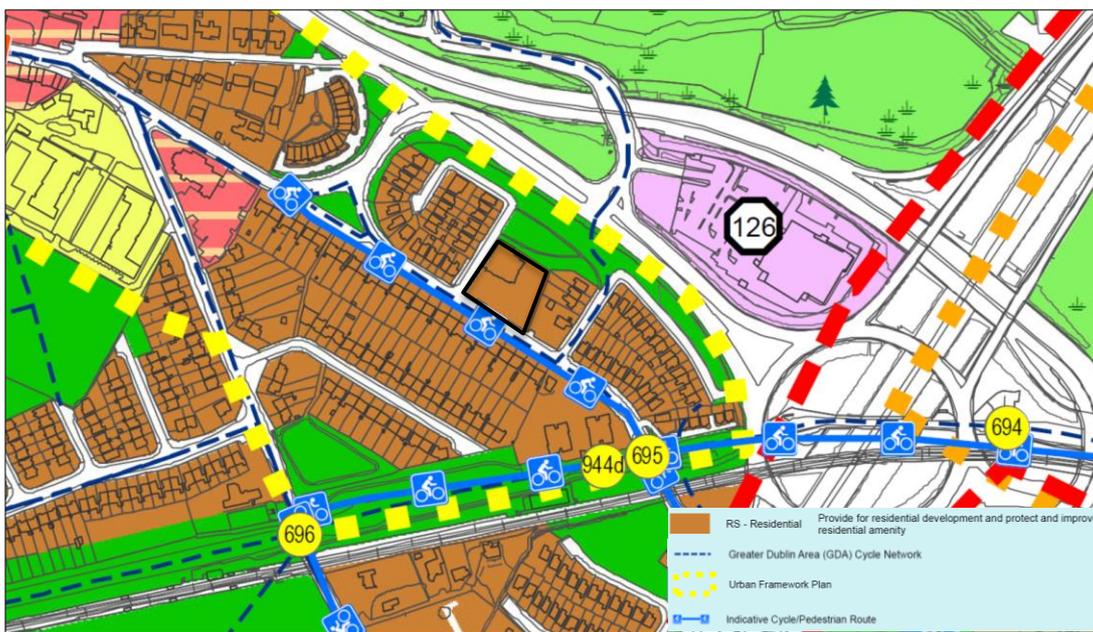


Figure 6.1: Zoning Map with Subject Site Outlined in Black

Source: *Fingal Development Plan 2017 – 2023, Annotated by Thornton O'Connor Town Planning, 2019*

Residential use is 'permitted in principle' on 'RS' zoned lands. As the subject scheme proposes a Shared Living residential development, the proposed development fully complies with the zoning objective of the site. The scheme provides 210 No. Shared Living bedspaces in lieu of the existing Brady's public house/restaurant (to be demolished) which has no architectural or historical merit. The principle of demolishing the existing public house has been established under the extant permission at the site (FCC. Reg. Ref. FW16A/0079 / ABP Ref: PLo6F.248037).

The scheme has been designed taking into consideration the amenity of neighbouring residential units, by providing a sensitive contemporary design which is complementary to the surrounding context and scale.

6.1.2 Compliance with the Relevant Aims and Objectives of the Development Plan

This section assesses the consistency of the proposed Shared Living scheme with the relevant policies and objectives of the *Fingal Development Plan 2017 – 2023*.

Infill/Brownfield Development

The Development Plan notes a number of main aims which will be delivered by the strategic policies of the Plan including the following:

'Consolidate the growth of the major centres of Blanchardstown by encouraging infill development and intensification of development within appropriate locations.' [Our Emphasis]

Objective PM44 also aims to *'encourage and promote the development of underutilised infill, corner and backland sites in existing residential areas subject to the character of the area and environment being protected.'* [Our Emphasis]

Objective SSo8 aims to identify opportunities for infill development which will in turn reduce the need to zone additional greenbelt lands.

Objective SS15 highlights the need to maximise the efficient use of existing infrastructure and services by consolidating existing urban areas through infill and appropriate brownfield redevelopment.

The proposed scheme which involves the redevelopment of an existing underutilised, brownfield, infill site is fully in accordance with these strategic policies of the Development Plan.

We note that 4 No. storeys has previously been granted at the subject site and the addition of an extra floor represents the proper planning and sustainable development of the area having regard to the newly introduced Building Height Guidelines. We also note that the Landscape and Visual Impact Appraisal and Daylight/Sunlight Analysis submitted with the application demonstrates that no material impacts will occur as a result of the proposed development. Please refer to the Landscape Plan and Report which notes the physical features to be retained in addition to any new features proposed within the scheme.

Design of the Proposed Development

Objective PM45 promotes the use of contemporary and innovative design solutions while respecting the character of the area.

Objective DMS28 notes that *'a separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.'*

The proposed development has been subject to a high quality standard of design, siting and layout, created by Todd Architects, with the height transitioning from part 1 to part 5 No. storeys in suitable locations, in order to protect and respect the residential amenity of neighbouring properties while also appropriately densifying the subject site in accordance with National Policy. This innovative design will add interest to the streetscape and will be managed appropriately to ensure the amenity of the future residents and the local area will be protected.

To the north-east, the scheme fronts onto the public park, whilst to the south-west it fronts onto the Old Navan Road and has a distance in ranging from 30 – 37 No. metres from dwellings opposite. The scheme provides setbacks ranging from c. 25 No. metres – 40 No. metres from the dwellings along Talbot Court to the south-east and setbacks ranging from c. 22 – 43 No. metres from dwellings along Talbot Downs. We note that subsequent to the pre-planning consultation meeting with An Bord Pleanála, the building was set back at second floor level by an additional 6.63 m and by an additional 3.43 m at third and fourth floor levels from the rear of properties along Talbot Court.

Therefore, no overlooking opportunities to neighbouring properties will arise as a result of the proposed development.

Higher Density Development in Proximity to Public Transport

Objective MTo5 refers to providing higher density development along higher capacity public transport corridors.

As noted throughout this Report and the Planning Report enclosed with the Application, the site is well serviced by existing public transport routes such as various bus routes and Castleknock Train Station, therefore the accessible location is suitable to provide higher density development. (Full public transport details outlined in Section 3.3 of this Report and the Mobility Management Plan prepared by CS Consulting). The development will promote the use of public transport, cycling and walking as the principal modes of transport.

Environmental Policies

Objective ENo4 encourages proposals that are low carbon, are well adapted to the impacts of climate change and provide energy saving measures and energy efficiency throughout the siting, layout and design of a development.

Objective Glz4 refers to the need to include biodiversity conservation and/or enhancement measures for large scale developments

Objective Glz5 aims to incorporate provision for biodiversity, where appropriate, with public open space provision and sustainable water management measures (including SuDS) where possible.

The application is accompanied by the following reports:

- Appropriate Assessment Screening Report prepared by Moore Group;
- Environmental Report prepared by Thornton O'Connor Town Planning;
- Engineering Services Report prepared by CS Consulting;
- Site Specific Flood Risk Assessment prepared by CS Consulting;
- Construction and Demolition Waste Management Plan prepared by CS Consulting;
- Sustainability Statement by JV Tierney & Co.; and
- Operational Waste Management Plan prepared by AWN Consulting.

The AA Report concludes that there would be no significant effects, no potentially significant effects and no uncertain effects on the environment if the Project were to proceed. SuDS measures are outlined in the Engineering Services Report prepared by CS Consulting such as permeable paving, waterbutts for local irrigation and washing down in addition to the provision of an attenuation tank. We also note that photovoltaic panels and heat pumps are provided within the scheme which will contribute towards Ireland becoming a lower carbon society.

The proposal is therefore consistent with objectives ENo4, Gl24 and Gl25.

6.2 ***Blanchardstown Village Urban Framework Plan***

We note the provisions of '*Objective BLANCHARDSTOWN 1*' of the *Fingal Development Plan 2017 – 2023* which states that it is an objective to prepare an urban framework plan for Blanchardstown Village to guide future development.

However, no urban framework plan in accordance with this objective has been prepared and there is currently no timeframe in place for the preparation of this Urban Framework Plan.

6.3 **Conclusion**

The proposed application is consistent with the aforementioned policies and the guidance set out within the *Fingal Development Plan 2017 – 2023*.

7.0 CONCLUSION

This Statement of Consistency document has comprehensively overviewed all relevant national, regional and local planning policy documents which are considered to be of relevance to the proposed development at the subject site.

We submit that the proposed development is in accordance with all relevant policy documents discussed throughout this report and therefore the proposed development represents the proper planning and sustainable development of the area. National planning policy expressly seeks the densification of brownfield infill sites such as the subject application site through increased building heights while the *Apartment Guidelines, 2018* encourage the provision of the model of the Shared Living residential tenure. Overall it is considered that the proposal represents an innovative and creative design solution which will contribute towards alleviating the housing crisis while also contributing to the urban fabric of this area.

