



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-305459-19

Strategic Housing Development

Demolition of the existing part 1 to part 2 no. storey over partial basement public house and restaurant and construction of 198 no. Build to Rent shared living suites (210 bedspaces) and associated site works.

Location

Brady's Public House, Old Navan Road, Dublin 15

Planning Authority

Fingal County Council

Applicant

Bartra Property (Castleknock) Limited

Prescribed Bodies

Irish Water

TII

Observers

See Appendix 1

Date of Site Inspection

12th November 2019

Inspector

Erika Casey

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1.0 Introduction

- 1.1. This is an assessment of a proposed strategic housing development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016. The application was received by the Board on the 18th September 2019 from Bartra Property (Castleknock) Limited.

2.0 Site Location and Description

- 2.1. The site is located in an established suburban area northwest of the N3 junction with the M50. The section of the Old Navan Road on which the site is located is a cul de sac that has arisen on foot of the construction of the interchange between the N3 and the M50 c. 200 m to the east. The site is c. 600m from Castleknock railway station. It has a stated area of 0.317 ha and is currently occupied by a 2 storey public house located at the northwest corner of the site known as Brady's. The pub building comprises part of the northwest and northeast boundaries of the site and the area to the southwest and southeast of the existing building is laid out as surface car parking. There is vehicular access to the site from the Old Navan Road.
- 2.2. Development in the vicinity of the site comprises predominately 2 storey residential development. There is a residential estate road, Talbot Downs, to the immediate northwest with 2 storey houses on the far side of the road. There is an area of public open space to the northeast that connects the Talbot Downs and Talbot Court residential areas and which is bound to the north by the N3. The site is bound to the east by the rear of properties in Talbot Court and by the site of an older detached dwelling (Ashgrove) that is accessed off the Old Navan Road. The site is bound to the south by the Old Navan Road and by older 2 storey semi-detached houses on the south-western side of the Old Navan Road. The site and the immediate environs including the area of amenity space to the north are characterised by mature trees and planting. There are street trees on the Talbot Downs frontage and on part of the boundary along the Old Navan Road. There are also a number of trees along the northern and southern boundaries of the site.

3.0 Proposed Strategic Housing Development

3.1. The development comprises:

- 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 5 storey over basement Built to Rent Shared Living Residential Development (6,549 sq. m.) comprising 210 bedspaces (182 no. single occupancy rooms, 4 no. accessible rooms and 12 no. double occupancy rooms). The single occupancy rooms (182 no.) will measure 16 sq. metres, the 4 no. accessible rooms will be 23.5 sq. metres and the 12 no. double occupancy rooms will measure 18 sq. metres.

3.2 The development also provides:

- Provision of communal living/kitchen/dining rooms at each floor level to serve the residents of each floor. It is detailed that these spaces at each level will be used for cooking meals. It notes that experience from the UK has demonstrated that residents of Shared Living facilities use the kitchen spaces sparingly as residents are often provided with subsidised food in the work place or avail of takeaways. The areas of the living/kitchen/dining areas proposed are as follows:

Floor Level	Living/Kitchen/Dining Area
Basement	63.6 sq. metres
Ground Floor	52.3 sq. metres 58.7 sq. metres
First Floor	54.5 sq. metres 60 sq. metres 70.1 sq. metres
Second Floor	54.5 sq. metres 60 sq. metres 70.1 sq. metres
Third Floor	130 sq. metres
Fourth Floor	110 sq. metres
Total	783.8 sq. metres

- Communal resident amenity spaces for all residents including:
 - TV/cinema room at basement level (85 sq. metres)
 - Gymnasium and lounge/reception area at ground floor (99.1 sq. metres 101 sq. metres respectively)
 - Library/study at 3rd floor level (30 sq. metres)
 - Private dining room at 4th floor (23.5 sq. metres)
 - External roof terrace at 3rd floor (78 sq. m.)
 - External community amenity courtyards at basement (170 sq. m.) and ground level (336 sq. m.)

The floor areas of the community amenity areas is summarised in the table below:

Amenity	Total Sq. Metre
Cinema Room	85
Lounge Reception	101
Gymnasium/Fitness Space	99.1
Library/Study	30
Communal Private Dining Space	23.5
Roof Terrace	78
Ground Level Amenity Space	336
Basement Level Amenity Space	170
Total Amenity	922.6 sq. metres

- External amenity space at basement level accessed from the communal living/kitchen/dining room (30 sq. m.)
- Balconies at 3rd floor level facing north east/north west (14.35 sq. m.)
- Residents facilities including laundrette, linen store, accessible WC and bin store. The areas of these is summarised below:

Resident Support Facility	Area
Laundrette	33.7
Linen Room	25.5
Bin Store	40.7
Common WC/Stores	13.8
Total	113.7

- 2 no. car shared parking spaces
- 2 no. access to the public park along the north eastern boundary
- A lay by and delivery bay; emergency gate access to the courtyard (north west boundary); bicycle parking (245 spaces); boundary treatments; hard and soft landscaping; plant; PV panels; substation; switch room; generator; lighting and all other associated site works.
- The plot ratio of the development is 1.8. The site coverage is 58%.

3.3 The applicant sets out a detailed rationale for the development. Shared Living is described as providing short-medium term accommodation predominantly for employees working in areas of substantial employment in the Blanchardstown area. It is stated:

“Shared Living is a way of living in urban areas that is focussed on community and convenience, living in a combination of high quality communal spaces and high function, high quality private suites 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, a concierge with parcel storage facilities, 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, to clubs, events and building a cohesive community through engagement and social interaction.”

Documentation Submitted

3.4 In addition to the architectural, landscape and engineering drawings, the application was accompanied by the following reports and documentation:

- Planning Report
- Statement of Consistency
- Justification Report
- Environmental Report
- Shared Living Report

- Response to ABP Opinion
- Material Contravention Statement
- Niche Living Operational Plan
- Niche Living Shared Living Presentation
- Bartra Urban Living Study Quantitative Report
- Design Statement
- Mobility Management Plan
- DMURS Statement of Consistency
- Traffic and Transport Design Statement
- Infrastructure and Engineering Report
- Flood Risk Assessment
- Outline Construction Management Plan
- Outline Demolition Management and Construction Waste Management Plan
- CS Consulting Response to Item 6 of An Bord Pleanála's Opinion
- Sustainability/Energy Report
- Utility Infrastructure Report
- Tree Constraints Plan
- Tree Impacts Plan
- Tree Protection plan
- Arboricultural Survey and Report
- Appropriate Assessment Screening Statement
- Landscape Plan
- Landscape Report
- Landscape and Visual Appraisal
- Bay Survey

- Operational Waste Management Plan
- Photomontages and CGI's
- Daylight/Sunlight Analysis

4.0 Planning History

4.1. Reg. Ref. FW16A/0079 PL06F.248037

4.1.1. Permission sought for demolition of public house and construction of 41 no. apartments in 4 no. 4 storey blocks and all site development works. Fingal County Council granted permission subject to 22 conditions including the omission of the second floor of Blocks A and C, reducing the total no. of residential units to 38. The Board granted permission subject to a condition omitting the second floors of Blocks A and C and the second floor of Block D, a total reduction of 5 no. apartment units leaving 36 no. units in total, for the stated reason of '*protecting the residential amenities of adjoining property from undue overshadowing, overlooking and visual intrusion*'.

Other Relevant Decisions

ABP Reference ABP 304249-19

4.1.2 Permission granted by An Bord Pleanála on the 26th of July 2019 for a shared living scheme at the Old School House, Eblana Avenue, Dun Laoghaire, Co. Dublin comprising 204 no. shared living spaces.

5.0 Section 5 Pre Application Consultation

5.1. Pre-Application Consultation ABP302888-18

5.1.1. The pre-application consultation related to the following proposal at the development site:

The demolition of the existing building on the site and the construction of a 1-5 storey over basement shared living residential development with 223 no. bedspaces (6,914 sq. m.). It also included the following:

- Provision of communal kitchen / dining rooms at each floor level to serve residents of each floor.

- Communal resident's amenity spaces including laundrette, cinema room, gym, café / lounge / reception room, library / study and private dining room.
- Vehicular access from Old Navan Road. 2 no. car share spaces, delivery bay, bicycle parking, bin storage.
- Boundary treatments and landscaping. Pedestrian access to the park adjoining the site.

5.1.2. A section 5 consultation meeting took place at the offices of An Bord Pleanála on the 4th December 2018. Representatives of the prospective applicant, the planning authority and ABP were in attendance. Following consideration of the issues raised during the consultation process and having regard to the opinion of the Planning Authority, ABP was of the opinion that the documentation submitted **required further consideration and amendment** in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016. The applicant was advised that the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates that could result in them constituting a reasonable basis for an application for strategic housing development:

1. Principle of Shared Accommodation provision at this location

Further consideration of the documents as they relate to the principle of Shared Accommodation at this location. This consideration and justification should have regard to, inter alia, (i) the vision for the development of Blanchardstown and the relevant housing and settlement policies set out in the Fingal County Development Plan 2017-2023; (ii) the Sustainable Urban Housing: Design Standards for New Apartments, specifically the guidance on Shared Accommodation Developments and in particular sections 5.18, 5.19 and 5.22 and SPPR 9 of same and (iii) the suitability of this location for Shared Accommodation with regard to accessibility and connections to employment centres and community facilities. Comprehensive information regarding the nature of the proposed use should be submitted to facilitate assessment of this issue including details of the occupation, operation and management of the scheme. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

2. Residential amenity of proposed Shared Accommodation units

Further consideration and / or justification of the documents as they relate to the residential amenity of the proposed development particularly in relation to the access, design and layout of the scheme and the provision of resident support facilities and amenities and their location within the overall development, having regard to the provisions of the Sustainable Urban Housing: Design Standards for New Apartments including SPPRs 7 and 9 of same. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

3. Impacts on the visual and residential amenities of the area

Further consideration of the documents as they relate to the design and height of the development and to potential impacts on visual and residential amenities. In this regard, the prospective applicant should satisfy themselves that the design strategy for the site provides the optimal architectural solution for this location and that it is of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. The submitted documents should allow for further consideration of the overall height, elevational treatments and the proposed materials with regard to impacts on visual and residential amenities. The proposed development shall have regard to inter alia, national policy including the National Planning Framework, the Sustainable Urban Housing: Design Standards for New Apartments, the Urban Development and Building Heights Guidelines for Planning Authorities, the Fingal County Development Plan 2017-2023 and the site's context and locational attributes, in particular adjacent residential properties and the adjoining public open space. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

4. Parking, traffic and transport

Further consideration of the documents as they relate to parking, traffic and transport, having regard to the proximity of the site to Castleknock Train Station and to the availability of other public transport services in the area. Further consideration of vehicular, cycle and pedestrian connections to the Old Navan Road and the pedestrian connection to the adjoining public open space. The further consideration

of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.

5.1.3. The opinion notification pursuant to article 285(5)(b) also referred to specific information that should be submitted with any application as follows:

1. 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 in use as Build to Rent accommodation. There shall be 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 residents units are sold or rented separately for that period (Your attention is drawn to the provisions of Specific Planning Policy Requirement 7 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018).
2. Design rationale for the scheme to demonstrate a high quality of residential amenity for residents, to address the requirements of sections 5.15, 5.16, 5.17, 5.23 and SPPR 9 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018.
3. Photomontages, cross sections, visual impact analysis, shadow analysis and landscaping details to indicate potential impacts on the visual and residential amenities of Talbot Downs, Talbot Court and Old Navan Road and on the wider area, to include 3D visualisation of the scheme.
4. Tree Survey, Arboricultural Assessment and landscaping proposals to address (i) impacts on existing trees at the site and in its vicinity; (ii) the quantity, type and location of all proposed hard and soft landscaping; (iii) boundary treatments; (iv) the provision of a high quality public realm for residents of the scheme and as a contribution to the amenities of the area and (v) the interaction with the adjoining public open space including clarification of any pedestrian connection to same. The proposed landscaping scheme shall be integrated with parking, roads and access proposals and detailed SUDS measures.
5. Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the

standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development.

6. Rationale for the proposed car and cycle parking provision with regard to the standards set out in Chapter 12 of the Fingal County Development Plan 2017-2023 and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, to include (i) evidence based data from comparable developments in similar geographical locations to justify the proposed car and cycle parking provision; (ii) details of car and cycle parking management measures and the provision of visitor parking and (iii) a Mobility Management Plan.
7. A Site Specific Flood Risk Assessment to clarify the extent of the development located in any Flood Zone.

5.2. Applicant's Statement of Response to Pre-Application Opinion

- 5.2.1. The application includes a statement of response to the pre-application consultation, as provided for under section 8(1)(iv) of the Act of 2016, which may be summarised as follows:

The Principle of Shared Accommodation Provision at this Location

(i) The vision for the development of Blanchardstown and relevant housing and settlement policies set out in the Fingal County Development Plan 2017-2023

- The development is in accordance with the vision for the development of Blanchardstown set out in the County Development Plan which aims to consolidate growth by encouraging infill development and intensification of development. The redevelopment of an existing underutilised site is in accordance with objective PM44, SS08 and SS15 of the Plan.
- Blanchardstown is identified as a Metropolitan Consolidated Town. The site is 800 metres from Blanchardstown Main Street. It is also located close to major employment locations including Connolly Hospital, Dublin Enterprise Zone and the Blanchardstown Town Centre. The development will increase the residential population within Blanchardstown and support existing commercial, social and leisure facilities throughout the town.

(ii) Sustainable Urban Housing: Design Standards for New Apartments, specifically the guidance on Shared Accommodation Development and in particular sections 5.18 and 5.22 and SPPRE 9 of same.

- Note that the layout of the development, particularly in relation to the provision of communal living/kitchen/dining spaces has been informed by the recent permission for a similar scheme at Eblana Avenue, Dun Laoghaire.
- The development will help address the need for alternative types of accommodation to facilitate societal and economic change. Shared living is a suitable response to current household formation and housing demand, particularly having regard to the proximity of Connolly Hospital, the Dublin Enterprise Zone and Blanchardstown Town Centre. The site is proximate to Castleknock Train Station and is located in a central and accessible urban location.
- The proposed bedrooms are typically 16 sq. metres, 33% above the standard set out in the guidelines for single occupants. The double occupancy rooms are in line with the prescribed standards.
- The quantum of communal kitchen/dining/living space provided per person equates to 3.73 sq. metres. This is greater than that permitted at Eblana Avenue which provides an average of 2.8 sq. metres per person. In addition, the scheme provides communal amenity spaces to encourage social interaction between residents. 4.4 sq. metres of such facilities are provided per person. The development also provides other resident facilities such as a laundry. Each resident will also have access to Spike Global software which will support everything from access to clubs and events.

(iii) Suitability of this location for Shared Accommodation with regard to accessibility and connections to employment centres and community facilities. Comprehensive information regarding the nature of the proposed use should be submitted to facilitate assessment of this issue including details of the occupation operation and management of the scheme.

- There is a multitude of employment opportunities in close proximity to the application site. A Justification Report is submitted which details that the site is suitable for Shared Living Development having regard to:
 - Demand for accommodation generated by employees of Connolly Hospital as well as by families of medium to long term patients of the hospital.
 - Demand for accommodation generated by the Dublin Enterprise Zone, The Blanchardstown Town Centre and the National Aquatic Centre.
 - Demographic analysis demonstrates a younger age profile compared to the national average.
 - The site is located in a highly accessible area and within easy cycling and walking distance of a wide range of employment locations, community facilities and services in the general area which will serve the needs of the future residents.
- A Living Operation Plan is submitted which includes details of the operation and management of the scheme.

Residential Amenity of the Shared Accommodation Units

- A Shared Living Report is submitted with the application which details the scheme's compliance with the Guidelines and specifically the provision of facilities and amenities in the proposed development. A number of amendments have been made to the scheme on foot of the pre consultation meeting including a significant increase in the quantum of communal space available for residents to utilise.
- Note that subsequent to the pre application consultation with An Bord Pleanála, the 2 ring hob within each suite has been removed. Cooking facilities are functionally limited to tea/coffee facilities and toaster. Future residents of the proposed Shared Living Scheme will use the larger communal living/kitchen/dining rooms provided at each level to cook full meals due to the limited functionality and usability of the cooking facilities provided in room. Note that An Bord Pleanála in their decision relating to Eblana Avenue required the 2

ring hob to be placed back into the shared Living Suites and that they are happy to accept this condition should it be considered appropriate.

- It is detailed that the model proposed provides the optimal accommodation solution providing (i) in-room sharing; (ii) on-floor sharing and (iii) community wide sharing. By not proposing the cluster format, this allows residents to interact with a larger number of people in the shared spaces rather than a kitchen of a cluster where residents would become acquainted with only 4 or 5 no. residents, often strangers. The proposed arrangement expressly adheres to, promotes and facilitates the definition and concept of Shared Living.

Impact on the Visual and Residential Amenities of the Area

- A comprehensive Design Statement is submitted with the application. A number of amendments to the design of the scheme have been made. The building has been set back at 2nd floor by an additional 6.63m and at 3rd and 4th floor by an additional 3.43m from the rear of properties along Talbot Court to the south east. An access has been provided to the park at the rear of the site. An additional living/kitchen/dining room has been provided at all floor levels which significantly increases the quantum of communal open space. An additional external terrace has been provided at 3rd floor level and the cinema room has been increased to 85 sq. m.

Parking, Traffic and Transport

- The scheme provides 245 no. bicycle spaces including 12 no. bleeper bike spaces and 2 car share spaces. Castleknock Train Station is 7 minutes walk from the site. The site is located adjacent to multiple bus routes. State that the site in Dun Laoghaire where a similar scheme has been granted is located in proximity to employment locations, rail and bus services in addition to other facilities and services similar to the subject site in Blanchardstown. Therefore, the provision of zero private car parking spaces and 2 no. car share parking spaces is considered acceptable at the site. Pedestrian connections to the public park have been provided.

Response to Specified Information

5.2.2 With regard to Specified Information required, the applicant has submitted the following:

Covenant or Legal Agreement

- A covenant/legal agreement prepared by the applicant is enclosed with application.

Design Rationale

- Significant amendments to the scheme have been made to reduce the scale, massing and height. Two contrasting external materials are used to articulate the different volumes ensuring that the scheme will be of high quality and assimilate into its surrounding context.

Potential Impacts on Visual and Residential Amenity for Neighbouring Residents

- Photomontages and CGI's have been prepared. A Landscape and Visual Impact Appraisal has been undertaken. Shadow Analysis demonstrates that no prolonged material impacts will occur. Landscape Design Report demonstrates the high quality landscaped courtyards and external third floor terrace provided in the scheme.
- Note the planning history of the site and that a partial additional floor level has been provided from that previously granted in 2017. The additional floor however, only relates to the centre of the site and no adverse impacts will arise. The additional height is in response to the guidance set out in the Building Height Guidelines.

Tree Survey and Arboricultural Assessment and Landscaping Proposals

- Tree Survey and Arboricultural Assessment submitted.
- Detailed landscape plan and report submitted. Boundary treatment detailed. The public realm provided will offer a positive experience for residents.

Daylight and Sunlight Analysis

- A Daylight/Sunlight analysis is submitted with the application. The report considers daylight/sunlight impacts to the properties to the north west, east and south of the subject site and their respective external amenity areas. The development is in accordance with BRE Guidelines.
- An analysis of sunlight to the proposed amenity areas is also carried out. The basement courtyard and roof terrace meets the BRE Guidelines. The ground floor courtyard does not meet the guidelines. Notes however, that it has been designed to receive good levels of sunlight during the summer months.

Car and Cycle Parking Provision

- Refers to the comparable development of the Collective, Old Oak, London and that this site has a similar car and bicycle parking provision to that development. Also note that the permitted scheme at Eblana Avenue does not provide private parking for residents. The provision of 2 no. car club spaces for residents at the subject site is considered acceptable having regard to the sustainable location and proximity to significant employment locations and public transport. Detailed Mobility Management Plan submitted with the application.

Site Specific Flood Risk Assessment

- Site Specific Flood Risk Assessment demonstrates no risk of flooding having regard to the location of the site in Flood Zone C.

6.0 Relevant Planning Policy

6.1. National Policy

6.1.1. The following is a list of relevant section 28 Ministerial Guidelines:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas including the associated Urban Design Manual;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities as updated March 2018;
- Design Manual for Urban Roads and Streets (DMURS);

- The Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated 'Technical Appendices');
- Urban Development and Building Heights Guidelines for Planning Authorities;

6.2. Sustainable Urban Housing: Design Standards for New Apartments 2018

6.2.1. Section 5.0 of the Apartment Guidelines specifically relates to the Build to Rent (BTR) and Shared Accommodation Sectors. BTR developments are defined as follows:

Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.

6.2.2. Specific Planning Policy Requirement (SPPR) 7 sets out the following requirements for BTR developments:

- 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;*
- 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:

- 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.*
- 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.

6.2.3. Shared accommodation is to be considered as a subset of BTR accommodation.

SPPR 9 provides as follows:

Shared Accommodation may be provided and shall be subject to the requirements of SPPRs 7 (as per BTR). 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.*

6.2.4. Section 5.13 describes shared accommodation as follows:

... professionally managed rental accommodation, where individual rooms are rented within an overall development that includes access to shared or communal facilities and amenities.

6.2.5 Section 5.15 adds:

“One format of Shared Accommodation which is proposed by these guidelines is a residential unit comprising of 2-6 bedrooms, of single and/or double occupancy with a common shared area within the residential unit for living and kitchen facilities.”

6.2.6 Section 5.22 also states:

“Shared accommodation formats may be proposed other than the format outlined in paragraph 5.15 above. For example, such proposals may be related to the

accommodation needs of significant concentrations of employment in city centres and core urban locations such as major national level health campuses or similar facilities. Innovative formats may also be proposed to provide shared accommodation within protected structures in order to ensure their long term rehabilitation and to address sensitive architectural constraints of the subject building.”

6.2.7 Section 5.23 also states:

“The granting of planning permission for other shared accommodation formats from those outlined in paragraph 5.15 above will be at the discretion of the planning authority. In assessing such proposals, planning authorities should ensure that sufficient communal amenities are provided in accordance with the specified standards in Table 5b above and that the scale of the development is appropriate to the location/buildings involved and to the specific role that the development of the shared accommodation sector should play in the wider urban apartment market.

6.2.8 Section 5.16 provides quantitative standards for bedroom sizes and communal space floor areas. Section 5.17 states:

“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.”

6.2.9 Sections 5.18 and 5.19 provide guidance on suitable locations for shared accommodation schemes. The prevailing context of the proposed site is to be considered, with city centres being the appropriate location for such developments. Section 5.18 states:

“In this regard the obligation will be on the proposer of a shared accommodation scheme to demonstrate to the planning authority that their proposal is based on accommodation need and to provide a satisfactory evidential base accordingly. Where there is a failure to satisfactorily provide such a basis permission should be refused by the planning authority.”

6.3. Fingal County Development Plan 2017-2023

- 6.3.1. The settlement strategy designates Blanchardstown as a 'Consolidation Town' in the Metropolitan Area of the county, with a capacity of 11,757 residential units. The key tenet of the overall settlement strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form. Objective SS01 is to consolidate the vast majority of the county's future growth into the strong and dynamic centres of the Metropolitan Area while directing development in the hinterland to towns and villages. Objective SS12 is to promote the Metropolitan Consolidation Towns of Swords and Blanchardstown as Fingal's primary growth centres for residential development in line with the settlement hierarchy.
- 6.3.2. Development Plan section 2.8 notes that Blanchardstown is one of the largest and most important retail centres in the State and that there are several large public sector employers in the area including Fingal County Council, Connolly Hospital and the Institute of Technology, also a number of large ICT and pharmaceutical companies. Development Plan objective Blanchardstown 1 is to prepare an urban framework plan for Blanchardstown to guide future development including infill development that would not exceed 3 storeys. The development site is identified on Sheet 13 of the Plan as located within the area to be the subject of this framework plan. However, no urban framework plan in accordance with this objective has, to date, been prepared.
- 6.3.3. The site has the standard residential zoning objective 'RS', '*Provide for residential development and protect and improve residential amenity*'. Surrounding residentially developed lands are also zoned Objective RS. The lands to the north of the site are zoned Objective 'OS' (open space). There is an indicative alignment for a cycle route along the Old Navan Road in front of the site.
- 6.3.4. Development Plan section 3.4 sets out design criteria for residential development. Chapter 12 Development Management Standards includes standards for residential developments and parking provision. There are no specific objectives relating to shared housing developments.

6.4. Applicant's Statement of Consistency

6.4.1. The applicant has submitted a Statement of Consistency as per Section 8(1)(iv) of the Act of 2016, which indicates how the proposal is consistent with the policies and objectives of section 28 Guidelines and the County Development Plan. The following key points are noted:

- 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. 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.
- The scheme represents sustainable development as the site is situated in a residential area, in close proximity to a wide range of employment locations and public transport. The development is consistent with the National Strategic Outcomes set out in the NPF.
- In accordance with Rebuilding Ireland, the scheme would provide affordable residential accommodation in a core urban area with a high demand for housing.
- The application proposes a part 1 to part 5 storey over basement development. A 4 storey development was previously approved on the site. It is considered that the development is in compliance with the Building Height Guidelines and strikes a balance between respecting the planning parameters of the extent scheme and ensuring the development of a strategically located underutilised plot is maximised.
- The subject site is located either 15 minutes or 1,500 metres of numerous substantial employment location including Connolly Hospital, Dublin Enterprise Zone and Blanchardstown Town Centre and, therefore, can be described as a central and accessible urban location. The scheme is compliant with the standards set out under SPPR 9. The common living and kitchen areas are in line with those permitted at the Eblana Ave. scheme. In line with SPPR7,

communal amenity spaces are provided. The development will provide an enhanced overall standard of amenity for residents.

- The development is compliant with the 12 key indicators for development in urban areas as set out in the Urban Design Manual. The development is consistent with the guidance set out in DMURS.
- In terms of the Fingal Development Plan 2017-2023, residential use is permitted in principle on RS zoned lands. The development complies with the zoning objective of the site. The principle of demolishing the existing public house has been established under the extant permission.
- The development is in accordance with Objective PM44 of the Development Plan which encourages and promotes the development of underutilised infill sites and Objective SS15 which promotes consolidating existing urban areas through infill. The design of the development is considered consistent with Objective PM45 and DNS28 and is considered to be a high quality standard of design, siting and layout. The scheme is also in accordance with Objective MT05 which refers to providing higher density development along higher capacity public transport corridors. The site is well serviced by existing public transport routes including bus routes and the Castleknock Train Station.

7.0 Third Party Submissions

- 7.1. A large number of third party submissions have been made by local residents and the elected representatives Ruth Coppinger TD, Cllr John Burtchaell, Cllr Paul Donnelly, Cllr Breda Hanaphy, Cllr Natalie Treacy, Joan Burton TD, Cllr John Walsh, Jack Chambers TD, Cllr Freddie Cooper, Cllr Roderic O' Gorman, Cllr Mary McCamley (see Appendix 1). The main points made overlap and can be summarised as follows.

Principle of Development

- The site is not located in an existing core urban area. The site is located in an outer suburban housing estate. The apartment guidelines state that such shared living developments should be located in the city centre.

- The examples cited by the applicant such as the permitted scheme at Eblana Avenue and schemes in London such as The Collective bear no similarity to the subject site. These schemes do not set a precedent other than to confirm that such co-living schemes should be in town and city centres.
- A key determinant for shared living is location and proximity to work, amenities and public transport. The lack of any adjoining residential/social/recreational amenities immediately adjacent to the site would promote an insular type of development detached from the wider community.
- Applicant has not satisfied either the need or location criteria that are established in the Guidelines for shared living developments. Having regard to the guidelines and the applicants justification on the basis that the site is within walking distance of Connolly Hospital, submit that the hospital is not considered to amount to a significant concentration of employment within a city centre or core urban location. The guidelines are entirely unambiguous regarding the location suitability for such development.
- Refer to report – “Socio Economic Potential of Shared Living Accommodation in Ireland: An Opportunity to Contribute to the needs of Ireland’s Housing Market” (KHSK Economic Consultants). Refers that Dublin has 2 areas of demand for co-living: locations alongside international companies who need many short term young employees mostly in city centre locations and hubs such as universities and hospitals that could develop co-living schemes within their hubs/campuses in order to provide accommodation for employees and students. Submit that the subject site does not meet these criteria and that its outer suburban cul de sac location is inappropriate.
- The applicant has not demonstrated that the scheme will provide a level of affordability. No substantive evidence that the development will contribute to the rental market in the Blanchardstown area.
- Shared living is meant for a specific cohort of persons. Applicant has failed to provide comprehensive and credible information with regard to the schemes likely occupants. Development sets a poor precedent.
- Consider market research carried out by the applicant as inaccurate and not a true representation of the likely demand for co-living.

- The extant permission for an apartment scheme on the site represents a much higher quality and more appropriate scheme for the site.
- The development is contrary to the zoning objective and would fail to protect/improve the residential amenities of the area. Contrary to policies and objectives of the plan.
- Development is a material contravention of the Development Plan. Justification for such a contravention is not adequate. Development contrary to national, regional and local policy.

Parking, Cycling and Pedestrian Routes

- Concern that due to the non-provision of car parking in the scheme, that the development would result in overflow parking onto surrounding streets, resulting in congestion and impacting negatively on the amenity of property owners. Submit that such overspill parking may impede HGV access and emergency vehicle access to the cul de sac. No visitor parking provided. 2 shared parking spaces is inadequate.
- It is vital where shared accommodation development proposals are concerned, that the principal of minimal parking provision be inextricably linked to the centralised location of the scheme to avoid aggravating the pressure for on street parking. However, the connectivity of the subject site is incomparable to development such as that permitted at Eblana Avenue.
- The applicant has not provided evidence based data from comparable development in similar locations; therefore, the proposal to provide no car parking cannot be justified.
- There are no cycle facilities such as cycle lanes in the vicinity of the site.
- Bicycle parking facilities are poor. Spaces are open to the weather with poor security.
- Pedestrian routes to Connolly Hospital are uninviting. The site is isolated from the hospital.

Impact on Residential Amenities – Future Occupants

- Consider that there are too many resident rooms per living/dining/kitchen room and quality of amenity for future residents is poor. Communal facilities are minimal. Communal open space will be overshadowed. Basement courtyard inappropriate. The ground floor courtyard will have limited amenity.
- Ground and basement floor rooms provide minimal privacy for future residents. Basement residential accommodation is unacceptable.
- Aspect of a number of rooms is poor. 50% of the units are north or west facing. Concerns regarding sunlight and daylight access to rooms. Submit that due to the 'H' shape of the building and the single aspect nature of all rooms and most of the shared rooms, means that an extensive number of rooms will not receive any sunlight for much of the day.
- Concerns regarding internal noise environment.

Impact on Residential Amenity – Adjacent Properties

- Height, scale and massing of development considered excessive. Does not respect established character of the area. Would result in overlooking and overshadowing to adjacent properties having a significant adverse impact on the residential amenities of adjoining properties.
- Development would be visually obtrusive. It would have a significant negative impact on the streetscape and character of the area. Consider landscape and visual impact appraisal biased and inaccurate.
- Design is considered monolithic. Materials are out of character with the area. Plot ratio and site coverage excessive. Development represents overdevelopment of the site.
- Refer to extant permission and that this was a more considered scheme in terms of height, massing and set backs from adjoining property boundaries.
- Development is gated and does not promote permeability to public park from wider area. The development offers little to the external community. Schemes such as The Collective are noted for their inclusivity of the external community.

- The development will impact negatively on the park reducing its amenity. Child protection concerns. Development should provide its own public open space.
- Development will result in a transient population. An excessive number of single rooms are proposed which will not contribute to a sustainable community.
- The operation of the scheme would cause excessive noise impacts, impacting negatively on the amenities of adjacent properties. Particular concern regarding external bicycle parking area, bin storage areas and roof terrace.
- Concerns regarding solar reflection and light impacts.
- Concerns regarding impacts during construction phase, particularly from construction traffic and parking, noise, vibration and dust impacts.
- Development will depreciate the value of properties in the vicinity.

Loss of Trees

- Concern regarding loss of trees outside the red line boundary on the shared boundaries with Talbot Court properties.

Other

- Concerns regarding long term plans for the site when covenant expires.
- Train and bus services are at capacity.
- Concerns regarding increased sanitary risk.
- Presence of bedrock has implications for drainage and flooding on the site.
- Submit that there are inaccuracies in the application drawings.

8.0 Planning Authority Submission

- 8.1. Fingal County Council (DLRCC) has made a submission in accordance with the requirements of section 8(5)(a) of the Act of 2016. It summarises observer comments as per section 8(5)(a)(i) and the views of relevant elected members as expressed at the Area Committee Meeting dated the 3rd of October 2019. The planning and technical analysis in accordance with the requirements of section 8(5)(a)(ii) and 8(5)(b)(i) may be summarised as follows. The submission includes

several technical reports from relevant departments of FCC, which are incorporated into the following summary.

Planning Opinion

- Having regard to the location and characteristics of the site, it is the opinion of the Authority that the proposal is not acceptable in principle at this suburban location and does not comply with the objectives of the Development Plan. The proposal does not enhance the existing residential area in line with the Vision of the area.
- The development does not comply with Sustainable Urban Housing: Design Standards for New Apartments March 2018 by virtue of the absence of sufficient demonstration of the need for this type of accommodation in this area; the prevailing suburban context of the location of the site; the design, location and lack of suitable transport options and the failure of the applicant to demonstrate the overall quality of the facilities.
- The standard of accommodation proposed is considered sub-standard taking particular account of the level of amenity offered by the communal open space and the number of north and east facing single aspect units including a number at basement level.
- Taking account of the scale, bulk, mass and density and deficiencies in the provision for car parking, the proposal would seriously injure the amenities of the area by way of overshadowing, overbearing, overlooking and as a result of overflow car parking.
- The overall design of the proposal is considered to represent an over development of the site which would lead to exceedances of the carrying capacity of the site and area and would conflict with the established built context. The development fails to visually or functionally integrate with or be compatible with adjacent buildings.
- The proposal would result in significant overshadowing of proposed communal open spaces. The structure would also result in a significant increase in overshadowing of private open space of existing property and of the public open space to the north of the proposal.
- In response to Item 6, the applicant presents an example of a development located in proximity to Willesden Junction Train Station. The example chosen

bears no functional relationship to the suburban location of the proposal and contributes in no way to the making of a case for the absence of car parking in the proposal under consideration. The context and location of the Eblana Avenue location is different from the application site with particular reference to public transport and on street parking. The site is considered to be peripheral and suburban, without access to a high frequency transport network. The absence of car parking and consequent overflow of cars will impact negatively on the residential amenity of both existing and future residents of the area.

- Both qualitative and quantitative aspects of cycle storage are considered to be below the standard expected, particularly in the circumstances of the subject application where cycling is relied upon as the entire private transport provision within the development. Measures to address noise impacts from bins and bike stores on the amenity of existing and future residents does not appear to have been addressed in the design.

Water Services

- No specific concerns raised regarding the provision of or impacts on water services arising from the proposal.
- The proposed development due to its scale and density does not allow for any preferred green SUDS measures such as infiltration trenches, swales, soakaways, basins etc. Permeable paving is however, proposed in the two parking spaces. Water butts for local irrigation and washing down is also proposed, although the functionality of these are doubtful. There may be scope for a green roof system and the applicant should be requested to consider this in the final design.
- Given the nature of the site and the development, it is not considered necessary to investigate the flooding issue further.

Transportation Planning Section

- Does not consider the location of the development to be a central location comparable to a City Centre where public transport options and provision would be significantly more and of higher frequency. The location would be considered suburban in nature.

- Giving consideration to the proposal that the type of person attracted to the shared living model is likely not to own a car, the proposal does not consider adequate provision of visitor parking, staff parking and has not demonstrated that the current proposal of providing 2 shared car parking spaces would accommodate the 210 bed development. No evidence or source data (existing surveys etc.) from existing similar developments has been provided to support the applicant's suggestion that all visitors would avail of public transport. Disabled parking also has not been provided.
- The applicant has indicated that a major driver in the justification of the development is nearby Connolly Hospital. However, this cannot be relied upon. Such development would be more suited being on the grounds of the hospital and not subject to severance by a National Primary Road.
- The applicant has indicated that a demand management approach has been adopted with the aim of preventing excessive and unnecessary vehicular trip generation. This approach works well when limiting parking at the destination of centres of employment and education but does not work well in residential areas, especially if parking on the street or in neighbouring housing estates is possible.
- Having regard to the guidelines, the requirement for cycle parking would be 315 spaces. A development that is relying on public transport and cycling should have a significantly higher standard of cycle parking design and meet the required standards. Sheltered, secure cycle parking should be provided. A cycle storage building or area should be designed to a high standard and incorporate security.

Parks and Green Infrastructure Division

- The proposed development is not acceptable as it does not meet Development Standards in terms of public open space and play provision. The proposals for tree planting and landscaping include areas outside the application boundary and areas where tree planting may not be practical due to foundations and services. In the absence of an appropriate and feasible planting scheme along all the boundaries, the development would be inconsistent with its suburban context.

- The submitted tree report including proposal for medium to longer term replacement of trees on the public open space to the north are acceptable in principle.

Summary of the Views of Elected Members

- Site is considered to be an unsuitable location due to its suburban context. Public transport is at maximum capacity and development is unjustified on the basis of available transport links. Development does not meet the needs of the local community.
- Rights of tenants are unclear. Tenure will be short term and transient and residents will not add to the cohesion of the local area. Co-living is not an acceptable form of accommodation.
- Residential amenity of future occupants is a concern.
- Proposal is overdevelopment of the site and would impact negatively on the amenity of existing residents. It will have negative overshadowing impacts. Lack of parking is a concern.
- Development creates an unwelcome precedent.

Conditions

8.2 The Opinion recommends that permission is refused for the development. Note however, should the Board be minded to grant permission that appropriate conditions should be attached. Conditions are generally standard in nature. Conditions of note include:

Condition 4: Prior to commencement revised details shall be submitted and agreed with the Planning Authority to provide for some acknowledgement of the existing scale and character of the area. Reason: In the interests of the proper planning and provision of amenities of the area.

Condition 5: Prior to commencement revised details shall be submitted and agreed with the Planning Authority to ensure there is no potential for overshadowing of private open space of adjacent housing from the proposed terraces. Reason: In the interests of proper planning and protection of amenities of the area.

Condition 7: A financial contribution for the full quantum of Public Open space and play provision in accordance with Development standards. This financial

contribution would be used towards the upgrading of recreational facilities in the Castleknock area, Reason: In the interests of proper planning and the provision of amenities of the area.

Condition 8: Prior to commencement a revised landscape plan shall be submitted and agreed with the Planning Authority to clearly indicate how planting of trees can be achieved along the boundaries of the site. All services in the vicinity of tree planting shall be clearly shown on the landscape plan. Street trees shall be planted in constructed tree pits of a minimum volume of 16 cube metres. Reason: In the interests of proper planning and provision of amenities of the area.

Condition 9: Cycle parking quantum.

Conditions 10, 11, 12, 13 and 14: Detailed traffic conditions.

Condition 28: Financial contribution towards public art.

9.0 Prescribed Bodies

9.1. Irish Water (06.11.2019)

- Confirm that subject to a valid connection agreement being put in place between Irish Water and the developer, the proposed connection(s) to Irish Water network(s) can be facilitated.

9.2. Transport Infrastructure Ireland (01.10.2019)

- The proposed development shall be undertaken in accordance with the recommendation of the Transport (Traffic) Assessment and Road Safety Audit submitted. Any recommendation arising should be incorporated as Condition in the Permission, if granted. The developer should be advised that any additional works required as a result of the Transport Assessment and Road Safety Audits should be funded by the developer.

10.0 Environmental Impact Assessment (EIA) Preliminary Assessment

10.1. The application was submitted to the Board after the 1st September 2018 and, therefore, after the commencement of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

10.2. Item (10)(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:

- Construction of more than 500 dwelling units.
- Urban development which would involve an area greater than 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere.

(In this paragraph, "business district" means a district within a city or town in which the predominant land use is retail or commercial use.)

10.3. The proposed development involves 210 no. shared accommodation units on a site of 0.317 ha. The site is located in an urban area. It is, therefore, considered that the development does not fall within the above classes of development and does not require mandatory EIA.

10.4. I note the submitted Environmental Report dated September 2019. As per section 172(1)(b) of the Planning and Development Act 2000 (as amended), EIA is required for applications for developments that are of a class specified in Part 1 or 2 of Schedule 5 of the 2001 Regulations but are sub-threshold where the Board determines that the proposed development is likely to have a significant effect on the environment. For all sub-threshold developments listed in Schedule 5 Part 2, where no EIAR is submitted or EIA determination requested, a screening determination is required to be undertaken by the competent authority unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment. This preliminary examination has been carried out and concludes that, based on the nature, size and location of the development, there is no real likelihood of significant effects on the environment. The need for EIA is, therefore, precluded and a screening determination is not required.

11.0 Appropriate Assessment (AA) Stage I Screening

11.1. The European Sites Likely to be Affected

11.1.1 The development site is not within or directly adjacent to any Natura 2000 site. The AA Screening Report on file considers the following designated sites within a 15 km radius of the development site for screening purposes:

Site (site code)	Qualifying Interests
Malahide Estuary SAC (000205) 14.05 km	Mudflats and sandflats not covered by seawater at low tide [1140] Salicornia and other annuals colonising mud and sand [1310] Spartina swards (<i>Spartinion maritimae</i>) [1320] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes)* [2130]
Glenasmole Valley SAC (001209) 13.86 km	Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites) [6210] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>) [6410] Petrifying springs with tufa formation (<i>Cratoneurion</i>)* * denotes a priority habitat [7220]
North Dublin Bay SAC (000206) 12.57 km	Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) [1330] Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130] Humid dune slacks [2190] <i>Petalophyllum ralfsii</i> (Petalwort) [1395]

<p>South Dublin Bay SAC</p> <p>(000210)</p> <p>11.56 km</p>	<p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Salicornia and other annuals colonising mud and sand [1310]</p> <p>Embryonic shifting dunes [2110]</p> <p>The NPWS has identified a site-specific conservation objective to maintain the favourable conservation condition of the Annex I Habitat Mudflats and sandflats not covered by seawater at low tide [1140], as defined by a list of attributes and targets.</p>
<p>Rye Water Valley/Carton SAC</p> <p>(001398)</p> <p>8.3km</p>	<p>Petrifying springs with tufa formation (Cratoneurion)* [7220] * denotes a priority habitat</p> <p>Narrow-mouthed Whorl snail (<i>Vertigo angustior</i>) [1014]</p> <p>Desmoulin's Whorl Snail (<i>Vertigo moulinsiana</i>) [1016]</p>
<p>Malahide Estuary SPA</p> <p>(004025)</p> <p>14.08km</p>	<p>Great Crested Grebe <i>Podiceps cristatus</i> [A005]</p> <p>Brent Goose <i>Branta bernicla hrota</i> [A046]</p> <p>Shelduck <i>Tadorna tadorna</i> [A048]</p> <p>Pintail <i>Anas acuta</i> [A054]</p> <p>Goldeneye <i>Bucephala clangula</i> [A067]</p> <p>Red-breasted Merganser <i>Mergus serrator</i> [A069]</p> <p>Oystercatcher <i>Haematopus ostralegus</i> [A130]</p> <p>Golden Plover <i>Pluvialis apricaria</i> [A140]</p> <p>Grey Plover <i>Pluvialis squatarola</i> [A141]</p> <p>Knot <i>Calidris canutus</i> [A143]</p> <p>Dunlin <i>Calidris alpina alpina</i> [A149]</p> <p>Black-tailed Godwit <i>Limosa limosa</i> [A156]</p> <p>Bar-tailed Godwit <i>Limosa lapponica</i> [A157]</p> <p>Redshank <i>Tringa tetanus</i> [A162]</p> <p>Wetlands [A999]</p>
<p>North Bull Island SPA</p> <p>(004006)</p> <p>12.56 km</p>	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Shelduck (<i>Tadorna tadorna</i>) [A048]</p> <p>Teal (<i>Anas crecca</i>) [A052]</p> <p>Pintail (<i>Anas acuta</i>) [A054]</p>

	<p>Shoveler (<i>Anas clypeata</i>) [A056]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Golden Plover (<i>Pluvialis apricaria</i>) [A140]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Sanderling (<i>Calidris alba</i>) [A144]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Black-tailed Godwit (<i>Limosa limosa</i>) [A156]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Curlew (<i>Numenius arquata</i>) [A160]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Turnstone (<i>Arenaria interpres</i>) [A169]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Wetland and Waterbirds [A999]</p>
<p>South Dublin Bay and River Tolka Estuary SPA</p> <p>(004024)</p> <p>9.57 km</p>	<p>Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) [A046]</p> <p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130]</p> <p>Ringed Plover (<i>Charadrius hiaticula</i>) [A137]</p> <p>Grey Plover (<i>Pluvialis squatarola</i>) [A141]</p> <p>Knot (<i>Calidris canutus</i>) [A143]</p> <p>Sanderling (<i>Calidris alba</i>) [A144]</p> <p>Dunlin (<i>Calidris alpina</i>) [A149]</p> <p>Bar-tailed Godwit (<i>Limosa lapponica</i>) [A157]</p> <p>Redshank (<i>Tringa totanus</i>) [A162]</p> <p>Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179]</p> <p>Roseate Tern (<i>Sterna dougallii</i>) [A192]</p> <p>Common Tern (<i>Sterna hirundo</i>) [A193]</p> <p>Arctic Tern (<i>Sterna paradisaea</i>) [A194]</p> <p>Wetland and Waterbirds [A999]</p>

11.1.2 The site is located in an established urban area and does not contain any habitats listed under Annex I of the Habitats Directive. The AA Screening Report and Environmental Report do not refer to the presence of protected species. The AA Screening Report states that the closest European site is the Rye Water Valley/Carton SAC (Site Code 001398) which is located c. 8.3 km from the site. However, this site is hydrologically upstream of the site and, therefore, has no relevant connectivity. The closest sites with potential connectivity are located in Dublin Bay and the nearest of these is the South Dublin Bay and River Tolka Estuary SPA (004024) which is located c. 9.5 km to the east of the site. There is no connectivity between the proposed site and the River Tolka. Considering the scale of the project and the distance to the Dublin Bay European sites, there is no relevant hydrological or meaningful biological connectivity nor is there any relevant connectivity to any other European sites.

11.1.3 The screening considers that, given the scale of the proposed works and their location within the urban environment of Blanchardstown, there is no potential for significant effects during the construction phase. Similarly, in light of the developments proposed connection to existing municipal sewers for foul water and surface water, there are no significant emissions predicted during the operational phase. Given that the development is to be connected to the existing municipal sewer network and the lack of relevant connectivity to any European Sites, there will be no in-combination effects. It is, therefore, considered that there will be no potential for significant effects on any European site and, therefore, potential effects on European sites can be excluded at Stage I screening.

AA Screening Conclusion

11.1.4 I note the AA Screening Report submitted by the applicant, dated September 2019, which concludes that there will be no potential for significant effects on any European site and, therefore, potential effects on European sites can be excluded at a preliminary screening stage.

11.1.5 I note the urban location of the site, the lack of direct connections with regard to the source-pathway-receptor model and the nature of the development. It is reasonable to conclude on the basis of the information available, which I consider adequate in order to issue a screening determination, that the development, individually or in

combination with other plans or projects would not be likely to have a significant effect on the above listed European sites, or any other European site, in view of the sites' Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not, therefore, required.

12.0 Assessment

12.1. The following are the principal issues to be considered in this case:

- Principle of Development
- Quality of Proposed Residential Accommodation
- Height and Impact on Residential Amenities of Adjacent Properties
- Car and Cycle Parking
- Other Matters
 - Bat Report
 - Site Services, Surface Water and Flooding
 - Loss of Trees

These matters may be considered separately as follows.

12.2. Principle of Development

Introduction

12.2.1. The Apartment Guidelines refer to shared accommodation as a specific type of Build to Rent (BTR) accommodation where individual rooms are rented within an overall development that includes access to shared or communal facilities or amenities. The proposed development is described in the site and newspaper notices as 'Build to Rent Shared Living Residential Development'. The applicant has submitted a draft Covenant, which sets out that upon completion of the development, the shared accommodation units shall be used as residential accommodation and shall remain owned and operated by an institutional entity and that no shared accommodation unit shall be rented or sold separately for a minimum period of at least 15 years. The development, therefore, falls within the definition of BTR development provided in the Apartment Guidelines and meets the requirements of part (a) of SPPR 7.

12.2.2 Under the Fingal County Development Plan, the subject site is zoned Objective 'RS': *'provide for residential development and protect and improve residential amenity'*. The use 'Shared Living' is not specifically listed as a permissible use or a use open for consideration under the County Plan. In this regard, it is considered that the merits of the development must be considered having regard to its contribution towards the achievement of the zoning objective and compliance and consistency with the wider policies and objectives of the plan. I note that permission has previously been granted on the subject site for the demolition of Brady's Pub and the construction of a residential apartment scheme. The principle of residential use on the site is, therefore, acceptable in principle. I am also satisfied that due to the current underutilised nature of the site, that its redevelopment for a more appropriate intensive form of development is acceptable. There are a number of policies in the current Fingal Co. Development Plan that support the principle of infill development and urban consolidation including objectives SS08, SS15 and PM44.

12.2.3 However, as detailed in the 'Sustainable Urban Housing: Design Standards for New Apartments' (March 2018), this type of Shared Living accommodation format has specific locational requirements. The submission from Fingal County Council raises strong objections to the principle of this type of accommodation at this location. Significant objections have also been raised by third parties who consider the site suburban and highly unsuitable for a Shared Living scheme. I note that the matter of the suitability of the site was also raised at the pre-consultation stage with item 1 (iii) specifically stating *"consideration and justification should have regard to, inter alia....the suitability of this location for Shared Accommodation with regard to accessibility and connection to employment centres and community facilities."* A key issue, therefore, to consider is the appropriateness of Shared Living accommodation at this location.

Provision of Shared Living Accommodation at this Location

12.2.4 In support of the application, the applicants have submitted detailed documentation setting out the rationale for the proposed development and the suitability of the site including a Justification Report a report titled "Shared Living – a Design Led Approach to Modern City Living" and an "Urban Living Study".

12.2.5 The Justification Report sets out a number of points in terms of the suitability of this location for Shared Living accommodation including:

- The use of the subject lands for Shared Living residential development is appropriate having regard to the locational characteristics of the site, including its position in the core urban area of Blanchardstown – A Metropolitan Consolidated Town relative to the major employment centres in the surrounding area including Connolly Hospital Blanchardstown, the Dublin Enterprise Zone and the Blanchardstown Town Centre.
- The development complies with the policies and objectives of the County Plan including those that promote the consolidation of growth and encourage and promote the development of infill development (objectives PM44, SS08 and SS15).
- The subject site is well served by public transport with many bus stops located in close proximity providing easy access to locations such as Blanchardstown Shopping Centre and employers such as eBay (No. 17a/No. 39a) 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 within 7 no. minutes walking distance to the south-west of the site which facilitates easy access to locations such as Dublin Connolly Station, Pearse Station, Maynooth, Longford, Sligo and M3 Parkway.
- The subject development will meet the demand for accommodation generated by employees of Connolly Hospital which employs in excess of 1,100 staff. It provides a Satellite Centre for the National Children's Hospital. Submit that the Apartment Guidelines expressly refer to sites close to hospitals and public transport as central and accessible urban locations and suitable for high density residential developments. The site is 800 metres walking distance from the hospital. Letters of support from the General Manager of Connolly Hospital, Empath, a healthcare recruiter and Vista Career Solutions are submitted. It is also detailed that the development could play a role in addressing the need for family/relative accommodation associated with medium/long term patients that are subject to medium/long term stays in the hospital.

- The development will meet the demand for accommodation generated by the employees of the Dublin Enterprise Zone which is a c. 21 minute walk from the site. The zone consists of 779 business and 16,920 employees. The development will also meet demand generated by employees of the Blanchardstown Town Centre located over 1.5km from the site and also the National Aquatic Centre and National Sports Campus.
- It is detailed that demographic data demonstrates a younger age profile in the local area with 38% of the population under the age of 24. The development will provide an affordable accommodation option for this age cohort, many of whom would have a preference for purpose built, high quality accommodation where there are more opportunities for social interaction.
- Research indicates that there is a paucity of rental accommodation in the Blanchardstown area and that much of the rental accommodation is subject to a one year lease which would be unsuitable for contract workers. The accommodation that is available is not affordable. The development will provide a much more affordable rental option for employees looking to rent accommodation close to their place of employment. A further detailed assessment of Shared Living Vs Apartments or Room Sharing in the Blanchardstown area is set out in the report submitted – “Shared Living – A Design Led Approach to Modern City Living.”

12.2.6 Notwithstanding the submission of the applicant, I have significant concerns regarding the appropriateness of the location for a Shared Living development. The applicant asserts that having regard to the Apartment Guidelines, that the subject site constitutes a central and accessible urban location. This conclusion is drawn with reference to Paragraph 2.4 of the Apartment Guidelines which notes that central and accessible locations are generally suitable for higher density development that may wholly comprise apartments including sites within walking distance of significant employment locations including hospitals; within reasonable walking distance of high capacity urban public transport stops and within easy walking distance of high frequency (i.e. 10 minute peak hour frequency) urban bus services.

12.2.7 In this instance however, the development does not comprise apartments, but a very specific niche form of accommodation. Specific guidance regarding this form of

Shared Living accommodation is set out in section 5 of the guidelines. Shared living accommodation is referred to as a distinct segment in the overall urban accommodation sector. It is stated in para 5.19:

*“In assessing proposals for Shared Accommodation, the Planning Authority shall therefore have regard to the need for such a type of accommodation in an area with reference to the need to cater for particular employee accommodation needs. The prevailing context of the proposed site shall also be considered, **with city centre being the appropriate location** for such development”.* (my emphasis).

- 12.2.8 Whilst I acknowledge that there is likely to be a need and demand for affordable accommodation in the Blanchardstown area due to wider constraints in the housing market, I am not satisfied that the subject site constitutes a suitable or sustainable location for this type of accommodation format. The site in question is not city centre or even town centre. It is clearly suburban in character. It is located at the end of a cul de sac surrounded by two storey suburban housing. It is some distance from existing services and facilities, with Blanchardstown Village over 800 m away. I note that the Inspector in their previous assessment of the redevelopment of the site (ABP Reference 303911-19) clearly considered the site to be suburban, removed from the public transport node of Castleknock Train Station (refer to para 8.14).
- 12.2.9 Shared Living is a distinct accommodation format. Location is paramount to ensure the success of such housing models. Residents typically have reduced standards of accommodation (smaller room sizes and no private amenity space). Therefore, the primacy of location is critical. City and town centres are the most appropriate locations for such development, where residents can avail of a wide range of existing social and physical infrastructure, amenities and excellent public transport connectivity as well as immediate proximity to places of work.
- 12.2.10 Further guidance regarding shared accommodation is set out in Paragraph 5.22 of the Guidelines which state that such proposals may be related to the accommodation needs of significant concentrations of employment in city centre and core urban locations such as major national level health campuses or similar facilities. It is evident that the primary justification for the proposed development outlined by the applicant is that there are significant generators of accommodation demand in close proximity to the site and particularly the purported proximity to

Connolly Hospital. It is stated that it is envisaged that a significant portion of the rooms will be occupied by healthcare workers.

12.2.11 In reality however, Connolly Hospital is located over 800 metres away from the subject site, and is not readily accessible from the development. The pedestrian and cyclist route from the site to the hospital is circuitous and involves navigating 6 traffic controlled crossings over a number of major roads including an over pass over the N3 (refer to Figure 3 of Mobility Management Plan). The route is somewhat hostile along major roads, completely lacks surveillance and is not inviting for pedestrians, particularly as many of the future residents may be working shift patterns and travelling this route during antisocial hours. Furthermore, the site is located a significant distance from both the Blanchardstown Town Centre and the Dublin Enterprise Zone with the former being over 1.5km from the site and the latter a minimum of a 20 minute walk from the site. Whilst public transport in the vicinity of the site is good, it is not excellent. The site is located over 600 metres from Castleknock Train Station and is not served by either the DART or Luas. It is not a site considered to be particularly accessible to a high frequency transport network. It is acknowledged however, that there are plans to electrify this line.

12.2.12 Given the distance of the site from the concentrations of employment detailed by the applicant, I do not consider there is sufficient rationale for a development of this nature at this location. I note that the Guidelines specifically advise that this type of Shared Living development is only appropriate where responding to an identified urban housing need at particular locations. It is not envisaged as an alternative replacement to the more conventional apartment development. Whilst there may be an accommodation shortage in Blanchardstown, I do not consider that a Shared Living development in a location remote from the town centre and from locations of significant employment is appropriate. The overall objective of the guidelines is to ensure the provision of quality urban apartment development as a long term viable housing option. Having regard to the planning history, location and character of the site, it is this form of development that is most appropriate, rather than a development that is characterised by transient tenancy, isolated from major concentrations of employment and remote from existing social amenities and facilities.

12.2.13 The applicant also asserts that the development may be used by families of medium and long term patients of Connolly Hospital as well as by visiting sporting teams to the National Aquatic Centre and National Sports Campus. This seems at odd with the core concept of shared living which is stated by the applicant is to be targeted at younger professionals who are likely to live in the area 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 do not yet wish or have the resources to purchase a permanent home. With regard to these latter groups of potential end users, I note that a central tenet of the purpose built shared accommodation development is the creation of a social community environment. Families of sick relatives and sports groups attending the Aquatic Centre and Sports Campus are in my view highly unlikely to contribute to the creation of such a community and patterns of social interaction, undermining the core concept of this accommodation format.

Conclusion

12.2.14 In conclusion, I consider that the subject site is not located in a core urban area and is contrary to the specific and explicit guidance in the Apartment Guidelines that such developments should be located in city/town centre locations. Whilst I acknowledge that Shared Living has a role to play in the City's housing market and that there is a demand and need for additional affordable housing in the Blanchardstown area, I am not satisfied that sufficient justification has been put forward for a development of this nature at this location which is somewhat removed from the major centres of employment it is intended to serve.

12.2.15 A key determinant for shared living is location and proximity to work, amenities and public transport. The lack of any adjoining amenities immediately adjacent to the site would promote an insular type of development detached from the wider community. The applicant in my view has not demonstrated that this suburban location is appropriate for the Shared Living concept. The locational context of the site is significantly different to that previously granted by the Board in Dun Laoghaire (ABP Reference PL06F.248037) which was a site in the town centre, a central and accessible urban location, well served by the DART and multiple bus routes; was in a highly serviced area with a variety of restaurants, cafés and non-retail services; and within immediate proximity of a multitude of employment locations. The current proposal fails to demonstrate similar locational characteristics and in my view would

set an undesirable precedent and be contrary to the proper planning and sustainable development of the area.

12.3. Quality of Residential Accommodation

Shared Accommodation Units

12.3.1. Section 5.13 of the Apartment Guidelines 2018 sets out guidance regarding the format “shared accommodation”. One format which is proposed is a residential unit comprising of 2-6 bedrooms of single and/or double occupancy with a common shared area within the residential unit for living and kitchen facilities. Each of the provided bedrooms is required to be ensuite and to be of a floorspace size as per Table 5a below.

Table 5 (a) Shared Accommodation	Minimum Bedroom Size
Single *	12 sq. metres
Double/twin*	18 sq. metres
*Including ensuite	

12.3.2. The development comprises 198 no. rooms, described as ‘shared living units’ including 182 no. single occupancy rooms, 4 no. accessible rooms and 12 no. double occupancy rooms. The Shared Living Report states that the proposed rooms have an area of 16 sq. m. and include storage (6.15m³), lounge/sleeping area, closet, desk, toilet, shower, tea/ coffee making facilities, etc. Flexible fixtures are used to allow for a range of activities with a daytime ‘living’ arrangement and a night time ‘sleeping’ layout. The double occupancy rooms are stated to be 18 sq. metres and the accessible rooms are 23.5 sq. metres. The size of the individual units is in compliance with the guidance set out in Table 5a of the Guidelines.

12.3.4 Table 5b in Section 5.16 of the Guidelines provides the following guidance for the minimum floorspace extent of the common shared area for living and kitchen facilities:

Table 5b: Shared Accommodation – minimum common living and kitchen facilities floor area	
Bedrooms 1-3	8m ² per person
Bedrooms 4-6	Additional 4m ² per person
<i>Overall, Shared Accommodation units would have a maximum occupancy of 8 persons calculated on the single or double occupancy of the bedrooms provided (e.g. 2 x double bedrooms [4 persons] + 4 x single bedrooms [4 persons] = 8 person total occupancy).</i>	

12.3.5 The implication from this guidance is that the subject development should be served by 6 sq. m. of common living and kitchen facilities per bed space. On the basis of the 210 bed spaces proposed, this would equate to 1,260 sq. metres. The Guidelines appear to only make reference to one type/format of shared accommodation i.e. shared accommodation units would have a maximum occupancy of 8 persons calculated on the single or double occupancy of the bedrooms provided i.e. 8 persons occupancy. The plans before the Board propose a different format. The arrangement is set out as follows:

Level	No. of Bedrooms	Communal Living/Kitchen/Dining
Basement	14	63.6
Ground	43	58.66 52.27
First	56	70.1 60 54.5
Second	46	70.1 60 54.5
Third	23	130
Fourth	16	110
Total	198	783.8

- 12.3.6 The level of communal/living/dining space proposed is 783.8 sq. metres. It is stated that this is based on the precedent of the quantum of such floorspace that was accepted and permitted by the Board at the Shared Living Scheme at the Old School House, Eblana Avenue (ABP 304249-19). It is noted however, by the applicants, that the proposed scheme will provide 3.73 sq. metres of communal kitchen/dining/living space per person compared to 2.8 sq. metres permitted in the Eblana Avenue Scheme.
- 12.3.7 I note however, in the Eblana Avenue scheme permitted by the Board, there was a specific condition attached stating that *“All bedrooms shall be provided with functional kitchens to include cooking hobs”*. In this instance however, the applicants have explicitly excluded the provision of hobs in the individual rooms, stating that *“Future residents of the proposed Shared Living Scheme will use the larger communal living/kitchen/dining rooms provided at each level to cook full meals due to the limited functionality and usability of the cooking facilities provided in room”*. It is stated that they are willing to accept a similar condition regarding cooking hobs in the bedrooms should the Board consider it necessary. I would however, have concerns about facilitating cooking facilities in each room, given the very limited size of rooms and the difficulties of eliminating odour in what is effectively a bedroom. In my view, this arrangement effectively creates a substandard self-contained studio apartment and conflicts with the core concept of Shared Living which is to counter loneliness and isolation and promote social interaction and creation of communities (refer to p. 11 of Shared Living Report). Should however, the Board be minded to impose a similar condition, I would also recommend that a condition is attached detailing that the grant of permission relates solely to ‘shared living’ accommodation and does not constitute a grant of permission for individual dwellings as defined under the Residential Tenancies Act 2004 and that no unit/bedroom shall be let or sold as a self-contained residential unit.
- 12.3.8 Notwithstanding the previous decision by the Board, I do not consider that the Eblana Avenue development constitutes a precedent. Each application must be considered on its own merits. As noted above, in this instance, the locational context of the site is entirely different, and unlike Dun Laoghaire, the subject site does not have a wide range of restaurants, cafes, amenities and facilities on its doorstep. In this context, I consider that the provision of adequate kitchen and dining facilities is

of particular importance to ensure a sufficient level of amenity is provided to future occupants. I note that the Inspector under application reference 303911-19 was also of the view that the 6 sq. metre requirement was the appropriate quantum of such floorspace. The proposed scheme has a shortfall of approximately 476 sq. metres of common living and kitchen floorspace which in my view, is a significant deficit and will result in a substandard level of amenity for future residents. The development is contrary to the Apartment Guidelines and does not provide the minimum common living and kitchen facilities required.

Resident Services and Amenities

12.3.9 SPPR 7 (b) of the Apartment Guidelines provides that BTR development must be accompanied by detailed proposals for (i) resident support facilities and (ii) resident services and amenities. The proposed communal amenities as indicated in the floor plans are as follows:

Amenity	Total Sq. Metre
Cinema Room	85
Lounge Reception	101
Gymnasium/Fitness Space	99.1
Library/Study	30
Communal Private Dining Space	23.5
Roof Terrace	78
Ground Level Amenity Space	336
Basement Level Amenity Space	170
Total Amenity	922.6 sq. metres

It is stated that these facilities equate to approximately 4.4 sq. metre per person.

12.3.10 The wider recreation and leisure amenities provided in such Shared Living schemes are a key feature of this type of accommodation format. It is detailed in the Apartment Guidelines 2018 that “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”.

12.3.11 It is clearly detailed under SPPR 9 that whilst flexibility shall be applied in relation to the provision of amenity and storage space in such Shared Living schemes, the obligation will be on the project proposer to provide alternative, compensatory communal support facilities and to demonstrate the overall quality of the facilities

provided and that residents will enjoy an **enhanced** overall standard of amenity (my emphasis).

12.3.12 In the subject scheme, the majority of the proposed amenity spaces constitute the external amenity areas. These comprise 584 sq. metres or over 63% of the total amenity provided. Whilst the guidelines permit flexibility regarding the provision of communal amenity space in Shared Living Schemes, the level provided in the proposed development is significantly less than would be typical of a conventional residential scheme. I note for example, as detailed in the Inspectors Report in relation to appeal reference PL06F.248037, the extant permission had in excess of 1,000 sq. metres of usable external communal space. However, in this instance, it is not just the quantum of external communal amenity space that is problematic, but the quality. One of the main open spaces is provided at basement level, which in my view provides a poor standard of amenity. The sunlight and daylight assessment indicates that this space achieves adequate levels of sunlight. However, I consider its aspect poor. Its amenity is likely to be significantly compromised by the extent of racked bicycle parking along the eastern boundary, causing noise intrusion and disruption. In addition, the ground floor courtyard does not meet the BRE Guidelines in terms of adequate sunlight. As this space provides over one third of the total communal amenity space its quality is paramount. This is discussed further below.

12.3.13 The guidance suggests that such additional amenities should include sports facilities, shared TV/lounge area, work/study spaces and functions rooms. The remainder of the facilities to be provided in my view are minimal comprising a small cinema room, gym, study space, private dining room and lounge. Excluding the external amenity areas, these spaces would equate to c. 338 sq. metres, or just 1.5 sq. metres per bedspace. This in my view is deficient and I am not satisfied, particularly having regard to the deficit in communal kitchen, living and dining room facilities that the applicant has demonstrated that residents will be provided with an enhanced overall standard of amenity having regard to the extent of rooms proposed.

12.3.14 I note that the applicants state that the future occupants will have access to the park to the rear of the site. Pedestrian access is provided from the rear boundary. Whilst this is welcomed, it does not circumvent the need to provide adequate facilities and amenities on site.

Residents Support Facilities

12.3.15 It is stated in the guidelines that these comprise facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services and waste management facilities. It is stated in the application that residents facilities include laundrette, linen store, accessible WC and bin store. The areas of these is summarised below:

Resident Support Facility	Area
Laundrette	33.7
Linen Room	25.5
Bin Store	40.7
Common WC/Stores	13.8
Total	113.7

12.3.16 I would question that appropriates of categorising facilities such as a linen room and WC as resident support facilities. I have concerns over the adequacy of a 33 sq. metre laundrette to serve a development of this scale.

Aspect, Sunlight and Daylight

12.3.17 All of the units proposed are single aspect. I note that the rooms at basement level face out onto the proposed basement communal amenity area. A similar arrangement is proposed at ground floor level with a number of rooms facing into the ground floor courtyard. The landscape plan indicates the provision of some privacy screening at the interface of the units and the open space. Notwithstanding this, I would have concerns regarding the privacy and amenity of these rooms, particularly at basement level. Given that the units are single aspect, there is in my view potential for the future amenity of these rooms to be significantly disrupted when the communal space is being utilised.

12.3.18 A sunlight and daylight assessment has been prepared in support of the application. This indicates that the basement courtyard and the roof terrace comply with the relevant BRE Guidelines. The Ground Floor Courtyard however, fails to meet the standards and only 11.1% of its area will receive above 2 hours sunlight on the 21st of March. The relevant target is 50%. It is acknowledged by the applicant that the level of sunlight in the ground level courtyard is not favourable throughout the year but that the scheme has been designed to ensure that this courtyard does receive

good levels of sunlight during the Summer months. It is further stated that as Sunlight in the proposed ground level courtyard is lower than the recommended level due to site constraints, the inclusion of an accessible roof terrace on the 3rd floor has been included as a compensatory measure and that the roof terrace will receive extremely high level of sunlight throughout the year. As detailed above however, the proposed ground floor courtyard provides 336 sq. metres of the total 923 sq. metres of communal amenity space (36%). The fact that this space is significantly below the BRE standard is in my view not satisfactory and will further compound the overall poor standard of amenity proposed for future occupants.

12.3.19 In terms of the individual rooms and other communal rooms in the development the assessment indicates that all of the rooms comfortably meet the BRE guidelines on average daylight factor. The communal rooms at each level also meet the target values. I note however, that the threshold of 1.5% has been used for the kitchen living and dining rooms. A more appropriate threshold in my view would be 2%, given that these spaces are the primary communal living/dining/kitchen facilities serving the Shared Living units. Some of the living, kitchen and dining areas are just above the 1.5% threshold.

Management

12.3.20 The applicant is to retain ownership of the scheme and to operate the shared living accommodation as 'Niche Living'. The submitted Operational Plan and Shared Living Report provide details of the ongoing operation of the scheme. The accommodation is to be managed by an on-site team during the core hours of 7am to 10pm Monday to Sunday in addition to the Residential Relations Team on site in the morning to early afternoon and the General Manager from early afternoon to late night. It is stated that the role of the manager is to ensure that the appropriate inclusive communal atmosphere is maintained in the Shared Living Scheme through arranging and setting up social events. The service provided includes all utilities, waste management, cleaning and maintenance, linen collection, gym membership, access to events, concierge and access to interactive community software / app. Security personnel will be on-call at all times outside the core hours of operation. I have no objection to the proposed management regime.

Conclusion

12.3.21 The Apartment Guidelines (S.5.23) advise that in assessing proposals for Shared Living schemes Planning Authorities should ensure that sufficient communal amenities are provided in accordance with the standards in Table 5b. I am not satisfied that the development will provide sufficient communal kitchen/living dining rooms and development does not comply with the standards in this regard with a deficit in provision of over 470 sq. metres. Furthermore, I am not satisfied that the development will provide sufficient resident services and amenities. The guidelines explicitly note that such Shared Living Schemes must demonstrate that an enhanced overall level of amenity is provided. Having regard to the fact that the majority of the communal amenity areas are external and have poor aspect and sunlight access coupled with the limited quantum of such internal facilities within the building to serve the extent of bedspaces proposed, I consider that the development will provide a substandard level of residential amenity to future occupants. I also have concerns regarding the privacy and amenity of individual rooms, particularly those that face onto communal open space areas.

12.4 Height and Impact on Residential Amenities of Adjacent Properties

12.4.1 Significant concerns have been raised by a number of observers regarding the height, scale and mass of the development and its potential to have a significant adverse impact on the residential amenities of adjacent properties. The report from the local authority also notes that they consider the development to constitute overdevelopment of the site. The site is bound to the east, west and south by low density 2 storey suburban housing. Permission has previously been granted on the site for a development of 4 storeys (ABP Reference PL06F.248037). It is stated by the applicant that the footprint of the development matches as close as possible the footprint of the permitted scheme. The principal amendments are that the previous scheme comprised 4 no. individual buildings, whereas the current proposal comprises a single building which incorporates east and west facing courtyards within the overall footprint. It is considered that with this design approach, that the building appears more horizontal and unified in character. In terms of height, the scheme now incorporates a 5 storey element in the centre portion of the development, whereas the previous scheme had a maximum height of 4 storeys. It is detailed that the location of this element is removed at maximum distance from the

site boundaries in a manner which minimises its visual impact, yet adheres to current national policy seeking the densification of appropriate lands upwards rather than outwards.

12.4.2 In support of the additional height, the applicants have also submitted a Material Contravention Statement. Reference is made to the Fingal County Development Plan which includes an objective 'Blanchardstown 1' which states that it is an objective to prepare an Urban Framework Plan for Blanchardstown Village to guide future development including infill development that would not exceed 3 no. storeys. No such Urban Framework Plan has been prepared. It is stated that the development could be considered to materially contravene the objective to prepare a future Urban Framework Plan. The case is set out the height is considered appropriate having regard to the Building Height Guidelines and the National Planning Framework and that the Board are not precluded for grant permission for the development having regard to the provisions of Section 37 (2) (b). It is detailed that the site is well connected due to its location in proximity to significant employment locations and public transport and that the open aspect of the public park to the north east of the site provides the opportunity for the site to accommodate additional height without any material impacts. The imposition of a 3 storey height restriction would be contrary to SPPR1 of the Height Guidelines. A full assessment of compliance with SPPR 3 is provided.

12.4.3 The National Planning Framework and the Building Height Guidelines both clearly advocate effective consolidation of urban sites and increased building heights. However, the scale and height of the development must be balanced with consideration of the site's context, ensuring consistency with established residential form and the preservation of amenities of adjacent dwellings. This issue was given detailed consideration in the previous proposal pertaining to the site granted by the Board, with the Inspector noting number of concerns with regard to the potential impact of that development on residential amenity and specifically in terms of overbearing visual impact, overshadowing and loss of privacy. This concern particularly related to Block D and its proximity to no. 14 – 16 Talbot Court located to the east of the site and whose rear gardens abut the development site. The Inspector noted that a 3 storey block located in such close proximity to the rear boundary of the gardens of these dwellings would have a significant negative impact

in terms of perceived overlooking and overbearing effects, and that the height of this element of the scheme should be reduced to a maximum of two storeys where it adjoins the boundary. It was considered that this reduction in the height would reduce the bulk and visual impact of Block D. The Inspector also concurred with the recommendation of the Planning Authority which reduced the scale of Blocks A and C to the west of the site to be two storeys in order to protect the residential amenities of the dwellings on Talbot Downs. A condition was attached by the Board which omitted the second floor of Blocks A and C and the second floor of Block D.

- 12.4.4 The proposed development has a significantly different building format to that previously proposed. The permitted scheme comprised four distinct urban blocks with a central linear communal garden. The proposed development comprises singular 'H' shaped block format which significantly increases the overall bulk and mass of the development, although height is concentrated in the central part of the block providing some visual relief. The block has a number of set backs and a stepped profile to reduce potential impacts on neighbouring dwellings.
- 12.4.5 The development would be separated from the front elevations of residential properties opposite the site on the southern side of the Old Navan Road by a minimum distance of c. 33 metres. The site is separated by the road and the proposed development would face the front gardens of the properties opposite. No overshadowing issues arise as the proposed development is due north of these properties. Notwithstanding the increase in height proposed, I do not consider that there would be significant negative impacts on residential amenity of properties to the south on Old Navan Road. I do however, have concerns regarding the 4th floor set back level when viewed from the Navan Road in terms of the overall profile and form of the development.
- 12.4.6 The houses to the west on Talbot Downs are also separated from the appeal site by a road and the development would face the front gardens rather than private amenity areas of these dwellings. Separation distances are generally 19-23 metres to the front elevations of dwellings on Talbot Downs. The gables closest to Talbot Downs are two storeys with a set back third storey. The building will appear more bulky when viewed from these dwellings due to the overall increase in the massing of the block. However, the higher elements of the block are concentrated centrally and set

back c. 43 metres from the front elevations of these dwellings with the resident's amenity courtyard at ground floor level providing some visual relief.

12.4.7 More problematic, however, is the visual impact of the development when viewed from the dwellings at Talbot Court. The rear gardens of no. 14 – 16 as well as the detached dwelling (Ashgrove) located at the junction of Talbot Court and Old Navan Road abut the subject site. The front elevation and primary open space of Ashgrove face the site. The height of the gable closest to no.s 14 and 16 extends to two storeys and the gable closest to Ashgrove extends to 3 storeys. The remainder of the floors above are set back and staggered to varying degrees to reduce the visual impact. Notwithstanding the set backs and varying building heights proposed along the south east elevation with Talbot Court, the overall mass, scale and form of the building is significantly greater than what was previously proposed on the site. The current proposal will in my view appear visually obtrusive and incongruous when viewed from the gardens of these properties. There is likely to be a perceived sense of overlooking and loss of privacy. I consider that the overall scale and bulk of this elevation will detract from the residential amenities of these properties. The visual impact is also compounded by the proposed use of dark coloured cementitious render which increases the overall monolithic character of this elevation. I also have some concerns regarding the location of the external bicycle parking area and bin store abutting the boundaries of the properties and possible noise impacts that may arise.

12.4.8 With regard to overshadowing impacts, the applicants have submitted a sunlight and daylight study. This details that the BRE Guidelines recommend that for a garden or amenity area to appear adequately sunlit throughout the year, at least half of it should receive at least 2 hours of sunlight on the 21st of March. The analysis of impact on sunlighting in existing gardens surrounding the development indicates that all gardens in the vicinity of the site exceed the recommended target of 50%. Having regard to the shadowing study I am generally satisfied that the development will not have a material adverse impact on the amenities of adjacent properties by virtue of overshadowing. I would note however, that the development will have a significant shadow impact on the public open space to the rear of the site, which is not assessed or detailed in the analysis submitted (see March 21st shadow diagrams from 13.00 onwards). The impacts to this public open space are however, less

adverse in the Summer months, when this space is more likely to be used. In terms of daylight, the impact of VSC at 3 to 11 Navan Road, 7 to 12A Talbot Downs and Talbot Court. In all instances the study indicates that the required targets are met.

Conclusion

12.4.9 It is submitted by the applicants that the proposal is a sensitive response to the site's context and that the scheme has been designed to minimise potential impacts on the residential amenities of adjacent properties. The development maintains a similar building footprint to that previously approved by the Board in terms of proximity to adjacent boundaries, however, the block format and overall scale and mass of the development is significantly different. The stepped profile and set backs generally reduce the impact of the development and its increased height when viewed from the Navan Road and Talbot Downs. However, I consider the overall scale and somewhat monolithic design, particularly of the south eastern elevation will have a significant detrimental impact on the residential amenities of the properties at Talbot Court due to its overbearing impact. Overall, I consider the development to be a poor design response to the site compared to the previous proposal and is a scheme that will appear visually incongruous and out of context with its environs. In this regard, I am consider that the development will significantly detract from the residential amenities of the area and is contrary to the proper planning and sustainable development of the area.

12.5 Car and Cycle Parking

Car Parking

12.5.1 Significant concerns have been raised by third parties regarding the extent of parking proposed to serve the development. The development is effectively a car free development with the exception of 2 no. car share spaces. It is submitted by a number of observers that this will result in overspill parking onto the surrounding residential streets, causing disruption and nuisance to existing residents. The submission from Fingal County Council also objects to the lack of parking proposed and recommends refusal on this basis.

12.5.2 I note that the Opinion issued at pre application stage also requested that a rationale be submitted for the proposed car and cycle parking provision with regard to the standards set out in Chapter 12 of the Fingal County Development Plan 2017-2023

and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, to include (i) evidence based data from comparable developments in similar geographical locations to justify the proposed car and cycle parking provision; (ii) details of car and cycle parking management measures and the provision of visitor parking and (iii) a Mobility Management Plan.

12.5.3 In support of the application, the applicants have submitted A Mobility Management Framework and a specific response to Item 6 of the Specified Information. In terms of comparable developments in similar geographical locations, the applicants cite one example – The Old Oak Collective Shared Living Scheme in London. It is stated:

“The Collective is located 8 minutes’ walk from Willesden Junction station (on the Bakerloo Underground line and on the Overground network) and 13 minutes’ walk from North Acton Underground station (on the Central Line). Its proximity to high-quality public transport services is therefore also comparable to that of the proposed development site at Brady’s Pub, which is within a 7-minute walk of Castleknock railway station.”

12.5.4 Reference is also made to the permitted development at Eblana Avenue, noting its proximity to rail and bus services that provide links to the city centre and other orbital areas of the city.

12.5.5 Notwithstanding the assertion of the applicant that the subject site has similar characteristics to these two developments, I consider the locational context of the subject site entirely different. The Collective in London is in very close proximity to the London Underground which provides high speed transport connectivity. It is also located in proximity to the proposed cross rail project. The Eblana Avenue is located in immediate proximity to the DART which provides high frequency public transport connections to the City Centre. The capacity and frequency of service offered from Castleknock Station is not in my view comparable.

12.5.6 It is set out in the Mobility Management Plan that a Demand Management approach has been adopted in relation to car parking. It is stated that limited car parking is justified due to the nature of the development, the characteristics and location of the site and its proximity to high intensity employment zones. It is envisaged that the majority of tenants of the development will be employees of Connolly Hospital and that the proximity of the hospital to the site, combined with parking restrictions on the

hospital campus means that residents shall not require the use of a private car for travel to and from work.

12.5.7 The Sustainable Urban Housing: Design Standards for New Apartments 2018 state:

“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.”

12.5.8 I acknowledge that significantly reduced car parking provision is acceptable in well located Shared Living schemes. As noted above however, the site is not in a central location, but one that is highly suburban in character. The assumption of car ownership is largely predicated that the majority of end users will be employees of Connolly Hospital. As detailed above, the pedestrian route to the hospital is not particularly conducive to walking. Other end users identified are employees of other concentrations of employment such as the Dublin Enterprise Zone and Blanchardstown Shopping Centre, neither of which are in close proximity to the site. In terms of proximity to public transport, connectivity is good but not excellent. The train service is limited to 24 services in each direction Monday to Friday and the bus routes (within 5 minutes walk) typically have a frequency of every 20 minutes. Bus services within a 10 minute walk have a higher frequency typically between 10 and 15 minutes.

12.5.9 Having regard to the location of the site, I am not satisfied that the quantum of parking proposed is satisfactory. 2 car share spaces is limited to serve a development of this intensity. Limited set down parking is provided and no parking provision for staff or disabled users is provided. There is potential for car ownership to be higher amongst end users and staff, and in the absence of appropriate car storage/parking, this may well result in overspill parking to the surrounding streets resulting in congestion, illegal parking and nuisance to existing residents. This situation would be compounded by the fact that on street parking is not regulated or controlled (i.e. pay and display) in the vicinity of the site.

Bicycle Parking

12.5.10 In terms of bicycle parking, the applicant proposes to provide 12 blepper bikes which means that residents can have access to cycling facilities, without the need to own a bicycle. The provision of same is welcome.

12.5.11 With regard to conventional bicycle parking, the scheme proposes the provision of 245 spaces. 204 of these are to serve the residents of the scheme and are located at ground floor level and basement level. 41 visitor spaces (including the 12 bleeper bicycle spaces) are located in proximity to the building entrances. I am of the view that at least 1 bicycle parking space per bed space should be provided. There is a slight shortfall in this regard.

12.5.12 The Apartment Guidelines sets out specific guidance regarding the provision of bicycle parking provisions. It is stated:

“In particular, planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.”

12.5.13 The guidelines provide guidance regarding the appropriate location, quantity, design and management of such cycle parking. Of particular note is that cycle parking should be low maintenance, easy to use and easy and attractive to use by residents. It is also recommended that secure locker facilities are provided.

12.5.14 In the subject proposal, I have significant concerns regarding the bicycle parking provision. The majority is provided in a double racking system and most of the spaces (131 no.) are located at basement level where the only access is via a stairs with a bicycle wheeling channel rendering access difficult. None of the spaces are covered and no ancillary facilities such as lockers or bicycle repair room are provided. Considering that the development has no car parking and cycle parking is promoted as a key element of the mobility management plan, I consider this arrangement to be unsatisfactory and contrary to the guidance that bicycle parking should be easy and attractive for residents.

12.6 Other Matters

Bat Survey

12.6.1 The Bat Survey Report, dated September 17th 2019, details the findings of bat surveys comprising a daylight and night time detector survey carried out on the 12th and 13th of September 2019. A thorough survey of the building was carried out as well as trees on/adjacent to the site.

- 12.6.2 The surveys revealed that there was no evidence of roosting bats nor any bats in the existing building on the site. Trees within and adjacent to the development have low potential for hosting bat roosts being immature and lacking roost potential features. The night time survey showed very low levels of bat activity. Only one species of bat was positively identified during the various bat surveys.
- 12.6.3 It is stated in the report that works associated with the development are likely to lead to an increase in human presence at the site plus additional noise etc. However, given the lack of quality roost features in trees on site and within buildings in conjunction with the low level of bat activity during the night survey, it is unlikely that bats will utilise this site for roosting purposes in the future. It is concluded that the redevelopment of the site will not affect the roosting potential of the local bat population. I am satisfied that the surveys undertaken are robust and that the development will not result in any material adverse impacts to bats.

Site Services, Surface Water and Flood Risk

- 12.6.4 The development is to connect to the public water supply and foul sewer. I note the correspondence on file from Irish Water, which states that connection to the public water supply is feasible without upgrades.
- 12.6.5 SuDs proposals include permeable paving to all new parking areas, waterbutts for local irrigation and washing down and an attenuation tank with flow control device. No objection to the surface water management measures have been raised by Fingal Co. Co. although it is noted that the potential for green roofs could be explored further.
- 12.6.6 I note some concerns have been raised by third parties regarding flooding. A Site Specific Flood Risk Assessment has been submitted. It is stated that having regard to the Fingal County Council flood maps, the subject site is located in Flood Zone C. There is no record of historical flooding on the site. There is considered to be a negligible risk from fluvial flooding. Given the proposed surface water drainage measures, including an attenuation system limiting storm water run-off to 2 l/s and on site storage provided for the 1 in 100 year extreme storm event increased by 20% for the predicted effects of climate change, it is considered that the development is acceptable with regard to flooding and drainage issues.

Loss of Trees

- 12.6.7 Concerns have been raised by a number of third parties regarding the loss of trees on the site, including those on the public street, bounding the site on Talbot Downs. The applicants have submitted an Arboricultural Report which notes that due to the nature of the site, there is little potential to retain existing trees. It is evident that a lot of specimens on the site are of poor health and their retention is not merited. The total tree loss will be 4 no. category U trees, 17 no. category B trees and 9 no. category C trees.
- 12.6.8 It is also highlighted that the scheme has potential to negatively impact on a number of lime trees located outside but proximate to the site boundary. To ensure their protection, there may be a requirement for management intervention such a crown reduction type pruning within the foreseeable future. It is stated that there may be merit in agreeing a combined management and replacement scheme. The development will result in the loss of a Willow Tree adjacent to the northern boundary of the site. The Norway Maple Trees along the access road to Talbot Downs are also likely to be impacted on. The development will require the removal/replacement of these trees. It is stated however, that due to the location of the trees on a limited and narrow grass margin, it is likely that the retention of these trees regardless of development, is unsustainable beyond the immediate short term and that retention to maturity and full size would be impossible.
- 12.6.9 The Landscape Plan submitted by the applicant proposed new tree planting along the western boundary in replacement of the trees to be lost. I note however, concerns have been raised by the Parks Department regarding the viability of tree planting at this location may not be practical due to foundations and services. Should the Board be minded to grant permission, I recommend that suitable conditions are attached regarding the protection and preservation of trees in the vicinity of the site as well as revised landscape proposals to provide appropriate planting and screening along the western boundary.

13.0 Conclusion

- 13.1 The subject site is located in an area with a suburban character and is contrary to the guidance in the Apartment Guidelines that such Shared Living developments should be located in city centre locations. A key determinant for Shared Living is location and proximity to work, amenities and public transport. The site is not located in proximity to existing amenities and facilities and is not easily accessible from the employment centres to which it is intended the development would serve. The applicant in my view has not demonstrated that this suburban location is appropriate for the Shared Living concept. The proposal would set an undesirable precedent and be contrary to the proper planning and sustainable development of the area.
- 13.2 The Apartment Guidelines (S.5.23) advise that in assessing proposals for Shared Living schemes Planning Authorities should ensure that sufficient communal amenities are provided in accordance with the standards in Table 5b. I am not satisfied that the development will provide sufficient communal kitchen/living dining rooms and development does not comply with the standards in this regard. Furthermore, I am not satisfied that the development will provide sufficient resident services and amenities. The guidelines state that such Shared Living Schemes must demonstrate that an enhanced overall level of amenity is provided. Having regard to the fact that the majority of the communal amenity areas are external and have poor aspect and sunlight access coupled with the limited quantum of such facilities within the building to serve the extent of bedspaces proposed, I consider that the development will provide a substandard level of residential amenity to future occupants.
- 13.3 The development due to its scale, height, mass and design will have a significant detrimental impact on the residential amenities of adjacent properties, particularly at Talbot Court due to its overbearing impact. Overall, I consider the development to be a poor design response to the site compared to the previous proposal permitted on the site and is a scheme that will appear visually incongruous and out of context with its environs. In this regard, I am consider that the development will significantly detract from the residential amenities of the area.

13.4 Having regard to the suburban location of the site, I am not satisfied that the quantum of parking proposed is satisfactory. 2 car share spaces is limited to serve a development of this intensity. Limited set down parking is provided and no parking provision for staff or disabled users is provided. There is potential for overspill parking to arise to the surrounding streets resulting in congestion, illegal parking and nuisance to existing residents.

13.5 The bicycle parking provision is considered substandard in its design. The majority is provided in a double racking system and most of the spaces (131 no.) are located at basement level where the only access is via a stairs with a bicycle wheeling channel rendering access difficult. None of the spaces are covered and no ancillary facilities such as lockers or bicycle repair room are provided. Considering that the development has no car parking and cycle parking is promoted as a key element of the mobility management plan, I consider this arrangement to be unsatisfactory and contrary to the guidance that bicycle parking should be easy and attractive for residents.

14.0 **Recommendation**

14.1 On the basis of the above assessment, I recommend that the Board **REFUSE** the proposed development for the reasons and consideration set out below.

15.0 **Recommended Order**

Reasons and Considerations

15.1 In coming to its decision, the Board had regard to the following:

- a) The site's location within the administrative area of Fingal County Council with a zoning objective for residential development;
- b) The policies and objectives in the Fingal County Development Plan 2017 to 2023;
- c) Nature, scale and design of the proposed development;
- d) Pattern of existing and permitted development in the area;
- e) The Rebuilding Ireland Action Plan for Housing and Homelessness 2016;
- f) The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual;

- g) The Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March 2013;
- h) The Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual – a Best Practice Guide, issued by the Department of the Environment, Heritage and Local Government in May 2009;
- i) The Sustainable Urban Housing: Design Standards for New Apartments issued by the Department of the Environment, Community and Local Government in March 2018;
- j) The Urban Development and Building Heights Guidelines for Planning Authorities 2019;
- k) Submissions and observations received.
- l) The report and recommendation of the inspector including the examination, analysis and evaluation undertaken in relation to appropriate assessment screening and environmental impact assessment screening.

Appropriate Assessment

The Board completed an Appropriate Assessment screening exercise in relation to the potential effects of the proposed development on designated European Sites, taking into account the nature, scale and location of the proposed development within a zoned and serviced urban area, the lack of direct connections with regard to the source-pathway-receptor model, the Report for the purposes of Appropriate Assessment Screening submitted with the application, the Inspector's report and submissions on file. In completing the screening exercise, the Board adopted the report of the Inspector and concluded that the proposed development, individually or in combination with other plans or projects, would not be likely to have a significant effect on any European site, in view of the conservation objectives of such sites, and that a Stage 2 Appropriate Assessment (and submission of a Natura Impact Statement) is not, therefore, required.

Environmental Impact Assessment

The Board completed an environmental impact assessment screening of the proposed development and considered that the Environmental Report submitted by

the applicant, identifies and describes adequately the direct, indirect, secondary, and cumulative effects of the proposed development on the environment.

Having regard to:

(a) the nature and scale of the proposed development on an urban site served by public infrastructure,

(b) the absence of any significant environmental sensitivities in the area,

(c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended),

the Board concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment. The Board decided, therefore, that an environmental impact assessment report for the proposed development was not necessary in this case.

Proper Planning and Sustainable Development

The Board considered that:

1. Having regard to the location of the site within an established suburban housing estate, removed from Blanchardstown Town Centre and existing centres of employment and with poor pedestrian connectivity to Connolly Hospital, it is considered that the proposed shared accommodation residential development would be contrary to Section 5.19 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities which advise that this type of development is only appropriate where responding to an identified accommodation need at particular locations and that such development should be sited in city centre locations. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. The proposed development by reason of the shortfall in provision of common living and kitchen facilities for the shared accommodation contrary to the standards set out in Table 5b of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities coupled with poorly designed and inadequate leisure and recreational amenities would result in a substandard form of residential development to serve future

occupants. The proposal would be contrary to national and local policies which seek to deliver attractive and desirable housing options in appropriate locations, would set an undesirable future precedent and as such would be contrary to the proper planning and sustainable development of the area.

3. Having regard to the location of the site and to the established built form and character of the area, it is considered that the proposed development would be incongruous in terms of its design, height, bulk and form, would be out of character with the streetscape, would constitute overdevelopment of the site and would have a detrimental impact to the residential amenities of adjacent properties, particularly those located on Talbot Court. The proposed development provides an inadequate design response to this sensitive infill site, would be of insufficient architectural quality and would seriously injure the visual amenities of the area and be contrary to the proper planning and sustainable development of the area.
4. Having regard to the suburban location of the site and the absence of evidence based data to justify the limited car parking provision proposed, the Board is not satisfied that the development is served by sufficient car parking including that to serve future employees and disabled residents and may result in overspill car parking to the surrounding road network which would endanger public safety by reason of traffic hazard and obstruction of road users. Furthermore, the Board is not satisfied that the quantum and quality of bicycle parking is sufficient and it is considered that the proposed design of the bicycle parking is contrary to the guidance set out in Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities.

Erika Casey
Senior Planning Inspector
21st November 2019

Appendix 1

1. Peter Griffin, 4, Talbot Court, Castleknock, Dublin 15
2. Cllr Mary McCamley, FCC, Civic Offices, Grove Road, Blanchardstown, Dublin 15
3. Cllr Roderic O' Gorman, 27, Millstead, Mill Road, Blanchardstown Village, Dublin 15
4. Jack Chambers TD and Cllr Freddie Cooper, Laurel Lodge Shopping Centre, Castleknock, Dublin 15
5. Joan Burton TD and Cllr John Walsh, Dail Eireann, Leinster House, Dublin 2 and 10 Ashleigh Curt, Castleknock, Dublin 15
6. Cllr Paul Donnelly, Cllr Breda Hanaphy and Cllr Natalie Treacy, 7 Lonunda Court, Clonsilla, Dublin 15
7. Ruth Coppinger TD and Cllr John Burtchaell, Dail Eireann, Leinster House, Kildare Street, Dublin 2
8. Emer Currie, Local and General Election Candidate, 2, Westmanstown Cottages, Dublin 15
9. Graham Liddy, 19, Talbot Court, Castleknock, Dublin 15
10. Niamh Griffin, 4, Talbot Court, Castleknock, Dublin 15
11. Charles and Anne O' Connor, 54, Woodpark, Castleknock, Dublin 15
12. Edward and Denise Comerford, 1, Phoenix Court, Castleknock, Dublin 15
13. Colin O' Toole, 16, Talbot Court, Castleknock, Dublin 15
14. Emma Comerford, 16, Talbot Court, Castleknock, Dublin 15
15. Catherine Comerford, 40, Park Drive Court, Castleknock, Dublin 15
16. Charlotte O' Toole, 16, Talbot Court, Castleknock, Dublin 15
17. Paul Kelly, 22, Talbot Court, Castleknock, Dublin 15
18. Joseph and Sheelagh Gartlan, 18, Talbot Downs, Castleknock, Dublin 15
19. Theresa McGuinness, 17, Talbot Court, Castleknock, Dublin 15
20. Kathleen and Eduardo Athayde, 16, Talbot Downs, Castleknock, Dublin 15
21. Carmel O' Donoghue 7, Talbot Downs, Castleknock, Dublin 15
22. Chris Monks, 9, Talbot Court, Castleknock, Dublin 15

23. Shane Mulcahy, 21, Talbot Down, Castleknock, Dublin 15
24. Claudio Manzoni, 12a, Talbot Downs, Castleknock, Dublin 15
25. Sinead Kilgarriff, 7, Talbot Downs, Castleknock, Dublin 15
26. Leo and Imelda Tracey, 3, Talbot Court, Dublin 15
27. 26, Talbot Court, Castleknock, Dublin 15
28. Emma Carroll, 21, Talbot Downs, Castleknock, Dublin 15
29. Stephen and Nikki Carroll, 6, Old Navan Road, Castleknock, Dublin 15
30. Joan Hussey, 9, Talbot Downs, Castleknock, Dublin 15
31. Professor Eilish Mc Loughlin, 15, Talbot Court, Castleknock, Dublin 15
32. Tomas and Mary Roche, 11, Talbot Downs, Castleknock, Dublin 15
33. Dr. Gerard Tobin, 15, Talbot Court, Castleknock, Dublin 15
34. Warde Family, 12, Talbot Downs, Castleknock, Dublin 15
35. Lorna Hussey, 42, Lily's Way, Ongar Green, Clonsilla, Dublin 15
36. Paul Hussey, 9, Talbot Downs, Castleknock, Dublin 15
37. Mary and Frank Barret, 14, Old Navan Road, Castleknock, Dublin 15
38. Eileen O' Loughlin, 25, Talbot Court
39. Helen Mahon, 22, Riverwood Drive, Castleknock, Dublin 15
40. Deirdre O' Neill, 22, Roselawn Drive, Castleknock, Dublin 15
41. John and Rosemary Brophy, 10, Navan Road, Castleknock, Dublin 15
42. Brenda and Ann Garrigan, 29, Castleknock Road, Castleknock, Dublin 15
43. Eamonn and Aileen Connelly, 1, Talbot Court, Castleknock, Dublin 15
44. Aodh O' Murchu, 23, Talbot Court, Castleknock, Dublin 15
45. Anne O' Murchu 23, Talbot Court, Castleknock, Dublin 15
46. Michelle Barry and Ronan Lynch, 2, Talbot Court, Castleknock, Dublin 15
47. John Michael Mc Loughlin, 18, Talbot Court, Castleknock, Dublin 15
48. Barbara Mc Loughlin, 18, Talbot Court, Castleknock, Dublin 15
49. Tomas and Carole Dempsey, 10, Talbot Downs, Castleknock, Dublin 15

50. Eileen O' Carroll, 50, Woodpark, Castleknock, Dublin 15
51. Harry Freeman, 60, Woodpark, Castleknock, Dublin 15
52. Karen Cumiskey, 39, Woodpark, Castleknock, Dublin 15
53. Larry Pollard, 58, Woodpark, Castleknock, Dublin 15
54. Aideen Mullins, Castleknock Road, Dublin 15
John and Anne Reid, 53A
Woodpark, Castleknock, Dublin 15
55. Caroline Freeman, 60, Woodpark, Castleknock, Dublin 15
56. Louis O' Reilly, 13, Old Navan Road, Castleknock, Dublin 15
57. Sandra Brennan, 2, Old Navan Road, Castleknock, Dublin 15
58. Jim Brennan, 2, Old Navan Road, Castleknock, Dublin 15
59. Eamonn O' Donohoe, 12, Old Navan Road, Castleknock, Dublin 15
60. Fraser Hosford, 53, Woodpark, Castleknock, Dublin 15
61. Evan Gethin, 45, Woodpark, Castleknock, Dublin 15
62. Maura and Dean Kinnane, 19, Old Navan Road, Castleknock, Dublin 15
63. Brian Flanagan, 33, Woodpark, Castleknock, Dublin 15
64. Eamon T. Doyle, 15, Old Navan Road, Castleknock, Dublin 15
65. Irene Shelley and Myles Meagher, 52, Woodpark, Castleknock, Dublin 15
66. Richard and Penelope Wilson, 9, Old Navan Road, Castleknock, Dublin 15
67. Michael Brennan, 9, Talbot Downs, Castleknock, Dublin 15
68. Rory and Anne Sheils, 26, Talbot Downs, Castleknock, Dublin 15
69. Dawn Langrell, The Mews, Old Navan Road, Castleknock, Dublin 15
70. Tim and Ann Ryan, 8, Old Navan Road, Castleknock, Dublin 15
71. Karl Craven and Sandra Zauers, 5, Old Navan Road, Castleknock, Dublin 15
72. Terry and Teresa Reilly, 11, Talbot Court, Castleknock, Dublin 15
73. Michael Lavery, 35, Woodpark, Castleknock, Dublin 15
74. Martina Murphy and Patricia Ryan, Ashgrove, Old Navan Road, Castleknock,
Dublin 15
75. Anne and Sean Henneberry, 63, Woodpark, Castleknock, Dublin 15

76. John Brennan, 36, Woodpark, Castleknock, Dublin 15
77. Billy Linehan and Mary Carroll, 34, Woodpark, Castleknock, Dublin 15
78. Michael and Raymonde Mc Quaid, 4, Old Navan Road, Castleknock, Dublin 15
79. Tom and Anne O' Lone, 3, Old Navan Road, Castleknock, Dublin 15
80. Marian Donohoe, 27, Talbot Court, Castleknock, Dublin 15
81. Paul Donohue, 27, Talbot Court, Castleknock, Dublin 15
82. Edward and Derise Comerford, 1, Phoenix Court, Castleknock, Dublin 15
83. T. Delaney, 21, Talbot Court, Castleknock, Dublin 15
84. Bernadette Weir, 22, Old Navan Road, Castleknock, Dublin 15
85. Darren Kane, 14, Talbot Court, Castleknock, Dublin 15
86. Dominic and Carol Kane, 14, Talbot Court, Castleknock, Dublin 15
87. BPS Planning Consultants, 23, Saval Park Road, Dalkey on behalf of Woodpark and Old Navan Road Residents Association
88. Sharon Daly, 14, Talbot Downs, Castleknock, Dublin 15