

Planning & Statement of Consistency Report

Proposed Development on the Former Chivers Factory Site, Coolock Drive, Coolock, Dublin 17

April 2019



Contents

1.0	Introduction.....	1
2.0	Site Description and Context.....	3
3.0	Planning Application History.....	7
4.0	Proposed Development.....	8
5.0	Consistency with National Policy and Guidelines.....	20
6.0	Consistency with Regional Planning Policy	40
7.0	Consistency with Local Planning Policy.....	46
8.0	Conclusion.....	76
	Appendix 1 – Dublin City Council’s Section 247 meeting minutes.....	78
	Appendix 2 – An Bord Pleanala Pre Application Consultation Opinion.....	88
	Appendix 3 – Variation (No. 5) of the Dublin City Development Plan: 2016-2022	93

1.0 Introduction

- 1.1 This Planning and Statement of Consistency Report has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Platinum Land Limited under Section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016 in relation to the proposed Strategic Housing Development (SHD) at the Former Chivers Factory Site, Coolock Drive, Coolock, Dublin.
- 1.2 The purpose of the report is to provide An Bord Pleanála (ABP) with an overview of the planning case, which includes a planning assessment against national policy, guidelines, regional policy (adopted and emerging) and adopted development plan policy.

The Proposed Development

- 1.3 The proposed development is for the demolition of the existing buildings on the site and the redevelopment to facilitate the delivery of a Build to Rent residential scheme, which will comprise of the provision of 495 no. apartments (61 no. studio, 150 no. 1 bed, 3 no. 178 no. 2 bed and 106 no. 3 bed units) in 4 no. blocks above a basement car park.
- 1.4 The blocks also include an entrance / concierge and management suite, resident services and amenities including the entrance / concierge, resident services and amenities including function rooms, games room, dining area, study hub, homework club and communal work area.
- 1.5 The proposal also includes a service building which includes a creche, café and gym, as well as public open space, communal open space, car, bicycle and motorbike parking.
- 1.6 The applicant is committed to delivering a high-quality build to rent residential development in this location with a good mix of unit types, complemented by high quality landscaping which has regard to the existing site features and the established character of the area.
- 1.7 For further details on the design approach please refer to the architectural design statement, architectural drawings, landscape drawings and Landscape Design Report and Outline Specification for Softworks, which accompanies this SHD planning application.

Pre-Planning Consultations

- 1.8 Pre-application consultations have been undertaken with Dublin City Council in accordance with Section 5 of the Planning and Development Act 2000 (As amended by the Residential Tenancies Act 2016).
- 1.9 The first meeting was held with officers of Dublin City Council on the 10th April 2018, the second on the 9th May 2018 and the third on the 20th September 2018. The Council's minutes are enclosed in Appendix 1 of this report.
- 1.10 A pre-application consultation meeting was held with ABP on the 16th November 2018, with a response provided by ABP, dated 5th December 2018. This is contained in Appendix 2 of this report.

SHD Planning Application Package

- 1.11 This Planning and Statement of Consistency Report should be read in conjunction with the accompanying detailed documentation and drawings, the contents which are outlined in the cover letter with this submission.

Ownership / Policy Context

- 1.12 The total site area (i.e land that is outlined in red for the purposes of the planning application) is 3.86 hectares. 3.61ha of the site is owned by Veni Vidi Vici Limited. Platinum Land Limited is authorised to act on behalf of Veni Vidi Vici Limited in all matters regarding this site.
- 1.13 The remainder of the site (i.e 0.25 hectares) is controlled by Dublin City Council, which is included for the proposed pedestrian access improvements at Greencastle Road, Coolock Drive and at the Oscar Traynor Road / Coolock Drive junction. Letters of consent from both landowners are enclosed was this planning application.
- 1.14 The following table provides a breakdown of the site in planning policy terms:

Ownership	Dublin City Development Planning Policy	Site Area (ha)	Total Site Area (ha)
Veni Vidi Vici Limited	Residential (Z1 Zoning)	2.53	3.86
	Open Space (Z9 Zoning)	1.08	
Dublin City Council	Unzoned	0.25	

Table 1.1 – Site Planning Policy Breakdown

Structure of this report

- 1.15 This report is structured as follows:
- Chapter 2 – Site Context and Description;
 - Chapter 3 – Planning Application History;
 - Chapter 4 - Proposed Development;
 - Chapter 5 – Assessment against National Policy and Guidelines
 - Chapter 6 – Assessment against Regional Policy and Guidelines;
 - Chapter 7 – Assessment against the Local Plan Policy; and
 - Chapter 8 - Conclusion.

2.0 Site Description and Context

- 2.1 The total site area (i.e. the land included in the planning application red line boundary) is located at Coolock Drive, Coolock, Dublin as shown in Figure 2.1 and comprises c. 3.86 hectares. The application site is split into two parts, namely the Former Chivers Factory site and land beyond this within the ownership of Dublin City Council.

Proposed Residential Development Area

- 2.2 The part of the site (i.e. 3.61 hectares) which is proposed for the residential development and support amenities is located within a predominantly residential area, with two storey housing to the west and north. The closest housing to the site is located on the opposite side of Coolock Drive to the west, c.28m from the site boundary.



Figure 2.1 – Site Location

- 2.3 To the south is a golf course, as well as an Aldi food store, which lies within a mixed-use retail site. To the east is a range of industrial units which form part of the Cadburys factory site. To the north east lies predominantly industrial buildings.



Figure 2.2 – Site Context

- 2.4 The site is accessed from Coolock Drive and is bound by a palisade fence on all its borders, with sporadically located mature trees and shrubs along its northern, western and southern boundaries. Greencastle Road runs from east to west in parallel with the northern boundary, whilst Coolock Drive runs north to south, parallel with the sites western boundary.
- 2.5 The site comprises the former Chivers Factory buildings and a chimney stack (see Figure's 2.3 and 2.44).



Figure 2.3 – View of the exterior of the existing buildings within the site



Figure 2.4 – View of the interior of the existing buildings within the site

- 2.6 Figure 2.5 shows areas of hard standing and the northern part which comprises open space, scrub and the River Santry, which flows from west to east through the site.



Figure 2.5 – View of open space and River Santry across the northern part of the site

- 2.7 Topographically, the site is broadly level on the areas occupied by the buildings and hard standing areas, whilst the levels in the open space area to the north fluctuate.

Proposed Highway Improvements / Pedestrian Improvements

- 2.8 This part of the application site measures c. 0.25 hectares, which is in two distinct areas. The first comprises lands at Greencastle Road and Coolock Drive that includes the existing public highway and footpath, located immediately adjacent to the Former Chivers Factory site. This is included for pedestrian improvements, which form part of this planning application.

- 2.9 A further area is located c. 220m to the south of the proposed residential / local pedestrian improvements area. The land currently comprises the existing Oscar Traynor Road / Coolock Drive Road, as well as the connecting junction area.



Figure 2.6 Existing Pedestrian Crossing on Oscar Traynor Road



Figure 2.7 Oscar Traynor Road Facing East at the junction with Coolock Drive

Wider Context

- 2.10 The site (and specifically the former Chivers factory site) is located in close proximity to a range of existing amenities and public transport, which provides links to Dublin City Centre and other key locations. An overview of the proximity of the amenities is shown below, and more detail is contained in the Social Infrastructure Audit (SIA) and Traffic and Transport Assessment (TTA) which accompany this SHD planning application.

Facilities

- 2.11 The SIA identified 208 No. Community Facilities within 2km of the development site. These developments were broken down into categories and are outlined below. A list of the facilities and services is included in Appendix 1 of the SIA.

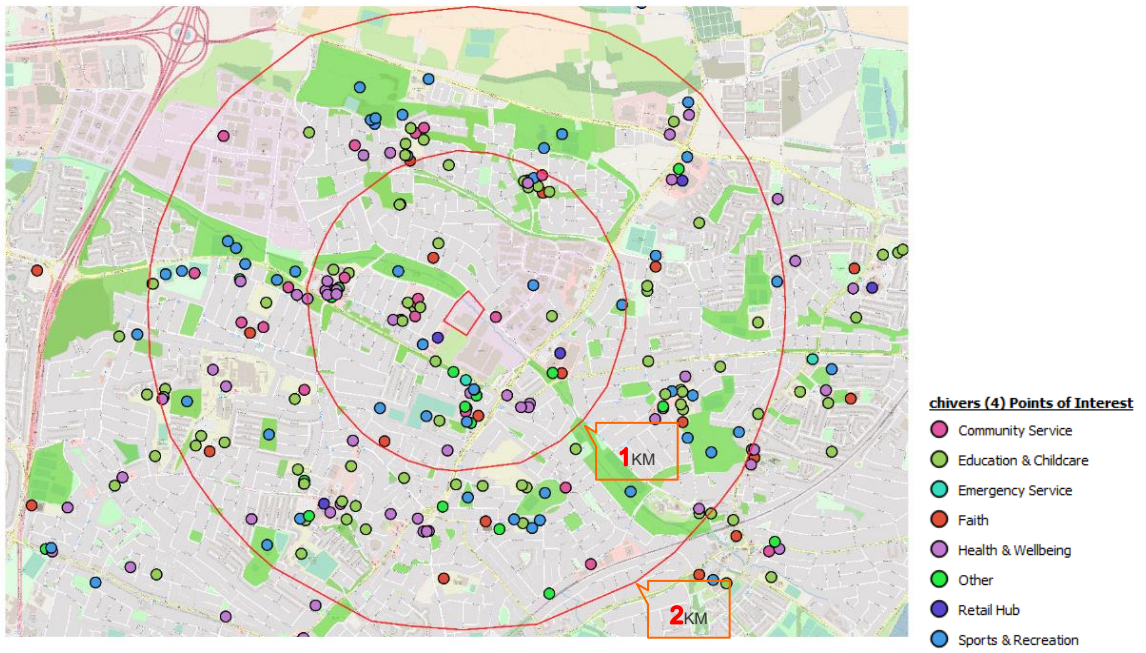


Figure 2.8- Facilities within 2km of the development site (Source: SIA by MHP)

Public Transport

- 2.12 Figure 2.9 provides an overview of the available bus infrastructure within a 1km walking catchment of the site.



Figure 2.9 – Bus Transport Accessibility (Source: Traffic and Transportation Assessment (TTA) by Aecom)

3.0 Planning Application History

3.1 Table 3.1 below sets out the planning application history for the site, all of which relates to its former use

Planning Application Reference	Description of Development	Granted / Refused	Date of Final Decision	Appealed?	Granted / Refused	Date of Decision
2074/13	Permission for the demolition of the factory buildings and ancillary buildings (The former Chivers Facility)	Refused	12/02/14	Yes	Granted	21/10/14
2045/13	For the demolition of the factory building and ancillary buildings.	Application Invalid		N/A		
2224/99	The erection of a 8.5m diameter X 4.0m high effluent holding tank on Chivers site.	Granted	19/10/99	N/A		
1502/93	2 Storey office extension and internal alterations.	Granted	04/03/94	N/A		
1943/92	Erect a warehouse extension to the existing warehouse facility.	Granted	19/11/92 (decision date)	N/A		
1562/92	Erect sign	Granted	19/11/92	N/A		
2414/91	Provide staff car park and associated landscaping with entrance from Coolock Drive on lands adjoining Coolock Drive.	Granted	12/02/92	N/A		

Table 3.1 – Planning Application History

4.0 Proposed Development

4.1 The proposed development description is as follows:

“Platinum Land Limited intend to apply to An Bord Pleanála for permission for a Build to Rent Strategic Housing Development at the Former Chivers Factory, Coolock Drive, Coolock, Dublin, D17 WP28.

The development will consist of:

- a) *Phase 1 includes the demolition of all existing buildings, existing boundary fences, removal of existing trees, breaking up and crushing the existing hard standing area, excavation and all associated site works;*
- b) *Phase 2 includes the development of a basement, measuring c. 11,707 square metres to accommodate 181 car parking, 634 bicycle spaces and 16 motorbike spaces, plant rooms, bin storage, attenuation tanks and circulation;*
- c) *Phase 3 includes the redevelopment of the site to include:*
 - i. *495 no. build to rent residential units (comprising 61 no. studio, 150 no. 1 bedroom, 178 no. 2-bedroom, and 106 no. 3 bedroom apartments), residential support facilities, amenities and services in 4 no. blocks which comprise:*
 - (i) *Phase 3a – Block A1 – includes 98 build to rent units (comprising 16 no. studio, 33 no. 1 bedroom, 39 no. 2 bedroom, and 10 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including function room, with heights proposed as 6 no. storeys (19.175m above ground level), 9 no. storeys (27.8m above ground level) and 10 no. storeys (30.745m above ground level);*
 - (ii) *Phase 3b – Block A1 – includes 98 build to rent units (comprising 16 no. studio, 33 no. 1 bedroom, 39 no. 2 bedroom, and 10 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including function room, with heights proposed as 6 no. storeys (19.175m above ground level), 9 no. storeys (27.8m above ground level) and 10 no. storeys (30.745m above ground level);*
 - (iii) *Phase 3c – Block B – includes 173 build to rent units (comprising 18 no. studio, 38 no. 1 bedroom, 54 no. 2-bedroom, and 63 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including Games Room, Dining Area, Study Hub, with heights proposed as 3 no. storeys (10.4m above ground level), 4 no. storeys (13.175m above ground level), 5 no. storeys (16.1m above ground level), 6 no. storeys (19.175m above ground level) and 7 no. storeys (21.95m above ground level);*
 - (iv) *Phase 3d – Block C – includes 126 build to rent units (comprising 11 no. studio, 46 no. 1 bedroom, 46 no. 2-bedroom, and 23 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including Homework Club, Communal Work Area with heights proposed as 3 no. storeys (10.4m above ground level), 4 no. storeys (13.175m above ground level), 5 no. storeys (16.1m above ground level), 6 no. storeys (19.175m above ground level) and 7 no. storeys (21.95m above ground level);*
 - ii. *Ground floor car parking (215 spaces) and bicycle parking (16 spaces);*
 - iii. *Service building including 1 no. creche, café and gym; and*
 - iv. *All associated ancillary development works including drainage, 4 no. electricity substations, access and roads within the site, pavements, new boundary walls, fencing, public open space, communal amenity space, tree planting, vehicle and pedestrian access and all associated site works.*
- d) *Phase 4 - Highway and pedestrian improvements including:*
 - i. *Upgrading of the site and signals at the junction of Coolock Drive and Oscar Traynor Road;*
 - ii. *Provision of a signalised pedestrian crossing to the south of the site entrance on Coolock Drive; and*
 - iii. *Provision of a signalised pedestrian crossing at the proposed pedestrian entrance to the park off Greencastle Road.*

The total site area for the planning application is 3.86 hectares.”

4.2 The proposed development is broken down into the following phases:

- Site Preparation Works Stage – Phase 1;
- Basement – Phase 2;
- The Residential Development Proposal – Phase 3
- The Pedestrian and Highway Improvements – Phase 4.

Site Preparation Works Stage – Phase 1

Demolition and Site Preparation

4.3 The existing buildings located within the site, measure c. 8,755 square metres are proposed to be demolished.

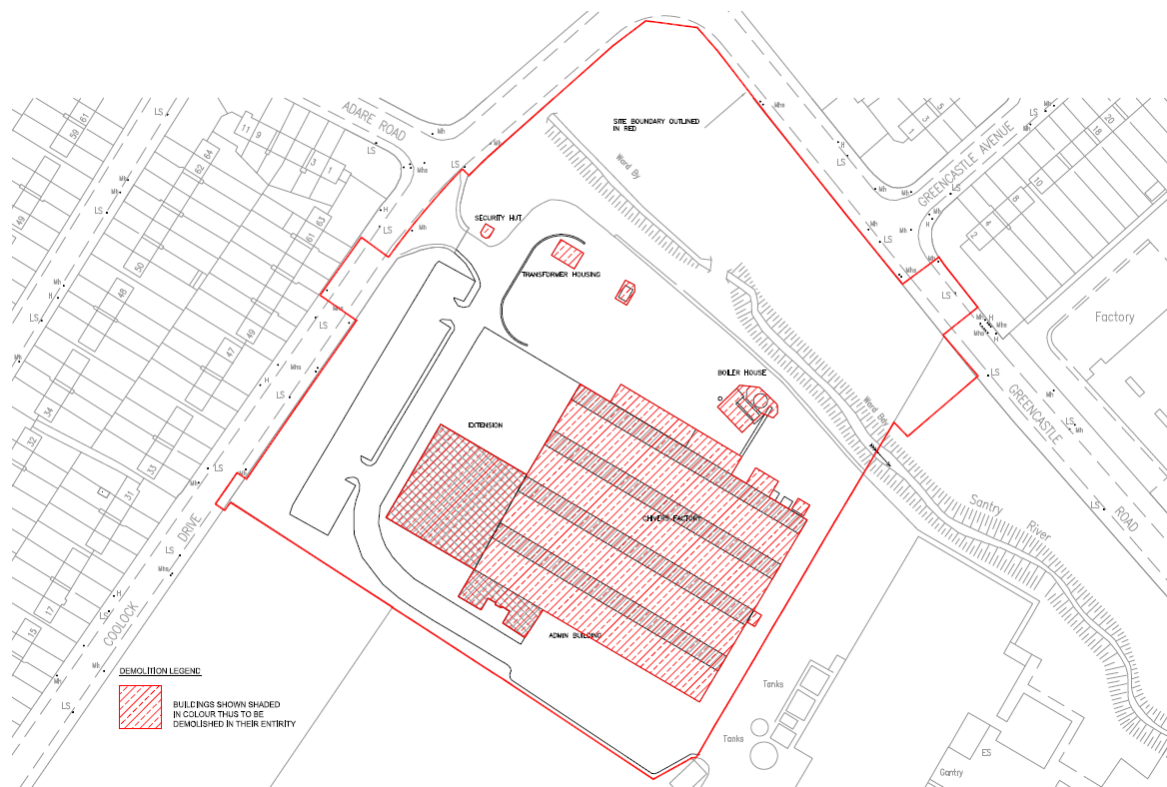


Figure 4.1 – Demolition Plan

4.4 The existing hard standing areas are proposed to be dug up, crushed and where possible recycled on site, or exported off site. Other existing fencing and apparatus on site, are also proposed to be removed / demolished during this phase of the development.

4.5 14no. trees are proposed to be felled and existing hedgerows / scrub are proposed to be cleared. Details of the vegetation loss are shown on CMK (Horticulture & Arboriculture) Drawing Number TCHI001 / 102.

4.6 To accommodate the proposed basement it is proposed that c.62,500m³ of material would be excavated. Further details on this matter are enclosed in the Environmental Impact Assessment Report (EIAR), Transport and Traffic Assessment (TTA) and Construction and Environmental Management Plan (CEMP).

Basement – Phase 2

- 4.7 The details of the proposed basement are included in the Plus Architecture’s Drawing 334_WS_02_01, which is proposed to be c. 11,707m. The proposed basement extends across Block B and Block C. Access to the basement car park will be a priority-controlled junction arrangement off the internal estate road, leading to a proposed ramp in Block B.
- 4.8 Please refer later in this section for a more detailed description of the parking provision that is proposed, in the basement and at ground level.
- 4.9 In terms of other areas specifically referred to on Drawing 334_WS_02_01, the basement includes the following:
- Bin storage:
 - 9no. locations totalling c, 1067 square metres;
 - Attenuation tank
 - 2no. locations totalling c.568 square metres; and
 - Plant rooms
 - 7no. locations totalling c.225 square metres.

The Residential Development Proposal – Phase 3

- 4.10 Phases 1 and 2 facilitates the delivery of the following elements of the proposed development, namely:
- The Build to Rent Residential Properties;
 - Residential Services and Facilities;
 - Access and Internal Road Layout;
 - Public Open Space, Communal Open Space and Landscaping;
 - Car Parking (Ground floor and basement);
 - Bicycle and Motorbike Provision (Ground floor and basement);
 - Public Lighting;
 - Basement; and
 - Site Services.

The Build to Rent Residential Properties

- 4.11 The accompanying architectural drawings shows the proposed residential layout, which, in total comprises 495 Build to Rent properties in 4 no. Blocks (A1, A2, B and C). Table 4.1 sets out the proposed schedule of accommodation:

Block	Number of Bedrooms per unit					Overall Total	10% larger	Dual Aspect	Number of Floors (including ground floor)	Height from Ground level
	Studio	1 bed	2 bed (3 people)	2 bed	3 bed					
A1	16	33	0	39	10	98	78	74	6 to 10	19.175m to 30.745m
A2	16	33	0	39	10	98	78	74	6 to 10	19.175m to 30.745m
B	18	38	3	51	63	173	140	100	3 to 7	10.400 to 21.950m
C	11	46	0	46	23	126	85	71	3 to 7	10.400 to 21.950m
Total	61	150	3	175	106	495	381	319		
%	12.32	30.30	0.61	35.35	21.41		76.97	64.44		

Table 4.1 – Proposed Development Breakdown



Figure 4.2 – Aerial view from the north east of the proposed development (Source: Architectural Design Statement)

4.12 Full details of each respective proposed residential block are set out in the architectural drawings enclosed with this application.

Residential Services and Amenities

4.13 Table 4.2 sets out the breakdown of the proposed residential services and amenities by block, and also includes cross reference to the proposed service building that includes the proposed creche, café and gym.

Block / Building	Proposed use by sq.m												Overall total by Block / Building (sq.m)
	Function Room	Games room	Dining Area	Study Hub	Communal Work Area	Homework Club	Cafe	Gym	Creche	Concierge	Bins	Store	
Basement											1067		1067
A1	110									38	19		167
A2	110									38	19		167
B		34	100	97						96	181	127	635
C					77.5	32				88	33		230.5
Creche, Cafe & Gym Service Building							34	412	357				803
Overall total by use	220	34	100	97	77.5	32	34	412	357	260	1319	127	3069.5

Table 4.2– Proposed Residential Amenities and Facilities

Service Building

4.14 The service building ground floor area measures c. 485 square metres (gross floor area) at the ground floor (i.e. its site coverage) and will include the following uses across a total of 3no. floors:

Floor	Proposed Use	Gross Internal Area (sq.m)
Ground	Gym	412
	Cafe	34
First	Creche	260
Second	Creche	97

Table 4.3– Breakdown of Service Building by use and floor



Figure 4.3 – View of Service Building

Creche

- 4.15 The creche is in the service building so that it easily accessible by parents and has been combined with other uses as advised in paragraph 4.5 (childcare) of the Sustainable Urban Housing: Design Standards for New Apartments (Guidelines for Planning Authorities) (herein referred to as the Apartment Guidelines (March 2018)).
- 4.16 The creche has been designed following reference to the Childcare Facilities (Guidelines for Planning Authorities) (June 2001). In terms of the potential number of children (aged 1-6 of pre school age) that may be generated from the proposed development, Appendix 2 of the Childcare Guidelines advises that one childcare facility per 75 dwellings is recommended.
- 4.17 Further advice at paragraph 4.7 of the Apartment Guidelines (March 2018) states that one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision. The number of potential pre-school aged children has been calculated as follows:
- 495 (total no. of units) – 61 (studio) – 150 (1 bed apartment) = $284 / 75 = 3.79 \times 20 = 76$ children (rounded up).
- 4.18 Therefore, it is estimated that c. 76 children of pre-school age may be generated from the proposed development, and to allow some flexibility, the creche area of the service building has been designed to accommodate c. 80 children. The details are shown in Pus Architecture Drawing Number's 334_CB_02_00, 334_CB_02_01, 334_CB_04_01 and 334_CB_05_01.
- 4.19 Appendix 3 of the Childcare Guidelines refers to what information should be supplied by an applicant for planning permission, the details of which are outlined as follows:
- Nature of the facility – Full day care;
 - Number of children being catered for – 80 no. children;
 - Parking provision for both customers and staff – 5no. spaces for customers and staff;
 - Proposed hours of operation;
 - 8am to 18.00 (Monday to Friday);
 - 8am to 13.00 (Saturday);
 - Closed Sundays and bank holidays;
 - Open space provision and measures for management of same;
 - The creche includes a total of 426 square metres of open space, with 118 square metres at ground floor and a further 308 square metres provided at the 1st and 2nd floor of the service building; and

- The details of which are shown on MA Drawing Number 101 (Landscape Masterplan Level 1 Courtyards) and would be managed by the future occupier of the building who would manage it in accordance with the appropriate guidelines.

Gym and Cafe

- 4.20 The gym and café would be available for the use of residents of the proposed development, as well as the wider community.

Access, Internal Road Layout and Servicing

- 4.21 It is proposed to retain the existing vehicular access arrangements at the site, this will result in a staggered T-junction with Adare Road. The vehicular access / egress will be formalised by the introduction of Stop signs and line to ensure that vehicles approach to a stop and perform the necessary checks for an acceptable gap in traffic before completing their movement to join Coolock Drive, in accordance with DMURS recommendations. It is proposed to provide dropped kerbing with tactile paving for pedestrians to cross the new accesses.
- 4.22 A secondary access has also been included within the southwestern corner of the site. The access will be predominately for pedestrians and cyclists accessing the site and will be prohibited to vehicular movements with the exception of emergency access.



Figure 4.4 – View of the proposed internal streets (Source: Architectural Design Statement)

- 4.23 A total of 4 no. access points are proposed along the site boundary, which include:
- 2 no. pedestrian (only), which includes 1no. at Greencastle Road and 1no. at Coolock Drive
 - 1 no. main access into and out of the site for vehicles, pedestrians and cyclists from Coolock Drive; and
 - 1 no. for pedestrians and cyclists from Coolock Drive, which can, if necessary be used as an emergency access for vehicles.

4.24 An AutoTrack analysis has been carried out at the site access junction to demonstrate its capability to cater for a 10.2m long refuse lorry. The results of the analysis show that the site access junction can accommodate servicing vehicles accessing and exiting the site

4.25 Further details are contained in the TTA and Aecom’s drawings.

Public Open Space, Communal Open Space and Landscaping

4.26 Detailed consideration has been given to the provision of public open space and landscaping within the development. The proposed landscaping enhances the overall quality of the scheme and incorporates the proposed development within the wider area, which would deliver a linked community.

4.27 The Landscape Design Report and Outline Specification for Softworks prepared by Mitchell + Associates (MA) accompanies this application and provides details of how the site is utilised in terms of open space provision, landscaping and planting.

4.28 A total of 28,503 square metres of open space is proposed, which is broken down between public, semi private (communal) for use by residents only and private open space, as set out in Table 4.4 below, and shown in MA Drawings LCH002-100, LCH002-101, LCH002-102

Open Space	Sq.m
Open Space Type	Quantum (sq.m)
Public Open Space	15660
Semi Private (Communal) Open Space	
Court yards	4260
Roof Gardens	5300
Private open Space	3283
Total	28503

Table 4.4 – Proposed Open Space

4.29 MA drawing number LCH002-100 (see extract in Figure 4.5) shows that a total of 269 trees are proposed to mitigate the impact of the 14no. proposed to be felled in Phase I.



Figure 4.5 - Public Realm adjacent to Blocks A1, A2 and Service Building

Car Parking (Ground floor and Basement)

4.30 A total of 396 no. car parking spaces are proposed to serve the development at ground and basement level. Table 4.5 provides a breakdown of car parking between the respective uses and basement or ground floor distribution:

Land Use	Apartment Type	No. Properties	of	Proposed Parking (basement)	Proposed Parking (ground floor)	Proposed Parking Overall
Apartments	Studio	61		0	0	0
	1 bedroom	150		79	0	79
	2 bedrooms	178		81	77	158
	3 bedrooms	106		21	85	106
	Visitor	N/A		0	15	15
	Car Club	N/A		0	10	10
Creche	N/A	N/A		0	5	5
Café	N/A	N/A		0	0	0
Gym	N/A	N/A		0	0	0
Disabled	N/A	N/A		0	23	23
Total				181	215	396

Table 4.5 – Car Parking Provision Proposed

4.31 As part of the overall car parking strategy it is proposed to allocate residential car parking spaces for all the 2 and 3 bedroom units, which can be summarised as follows:

- 1 space per 3 bed units (106 units);
- 1 space per 2 bed units (178 units).

4.32 Therefore 284 spaces will be allocated for the 2 and 3 bedroom units. The remaining 107 no. residential car parking spaces will be allocated to 107 no. of the 150 no. 1-bedroom units. Consequently 43 no. 1-bedroom units will not have a parking space, and no car parking will be allocated to the studio apartments.

4.33 Further details on car parking and the arrangements are included in Aecom's TTA.

Bicycle and Motorbike Provision (Ground floor and Basement)

4.34 Paragraph 4.17 of the Apartment Guidelines (March 2018) states that a general minimum standard of 1 cycle storage space per bedroom shall be applied, with any deviation shall be at the discretion of the planning authority and justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement / enlargement etc.

4.35 A total of 650 bicycle parking spaces are proposed to serve the development, with 634 proposed in the basement and 16no. at the ground floor. It is considered that the proposed bicycle parking is appropriate, given the location of the site and existing public transport provision serving this site. No objection has been raised by Dublin City Council. Further details on bicycle and motobike parking is included in Aecom's TTA.

Public Lighting

4.36 This planning application is accompanied by a Lighting Statement and supporting drawings which have been prepared by Metec Consulting Engineers. The design of which has been prepared in accordance with:

- BS 5489-1:2013 Code of Practice for the Design of Road Lighting;
- NSAI EN I.S. 13201-2 Road Lighting Performance Requirements; and
- Dublin City Council General Specification for Public Lighting Design and Installation in Residential, Industrial and Commercial Developments in the Dublin City Council Area

Site Services

Drainage / Water Supply

4.37 In terms of drainage strategy, full details of the water supply, surface water drainage and foul drainage are set out in the Water Services and Flood Risk Assessment, prepared by Cora, with a summary of what is proposed outlined below:

- Foul Water Drainage
 - It is proposed to divert the 450mm diameter public sewer locally such that the sewer is located under a main access road In the site and the necessary wayleaves are provided. All drainage works shall comply with Irish Water Standards;
 - A new connection to the public system be made to the diverted 450mm diameter trunk sewer as shown on Cora Drawing 1753/C001 and 1753/C003;
- Surface Water Drainage
 - A fully separated Surface Water Drainage System is proposed to retain storm water within the site with minimal run off via terraced swales forming a new wetland landscaping feature at the south bank of the Santry River. This strategy would reduce the run off from the site to the public system as a sustainable system shall be implemented on site for the first time. Details of the surface water strategy are shown on Cora Drawing 1753/C001, 1753/C002 and 1753/C004; and

- Water Supply
 - The proposed new water supply will be taken from the public network on Coolock Drive where it will be directed around the site in accordance with Irish Water Codes of Practice.

Electricity, Gas and other utilities

- 4.38 It is intended that a gas distribution network shall be extended by Gas Networks Ireland from the existing gas supply network to supply gas to the various units proposed throughout the whole development
- 4.39 It is the intention that the development shall be supplied from the local ESB Networks Medium Voltage Network, which includes Medium Voltage Sub-Stations on Coolock Drive (immediately adjacent to the site) and at Castle Elms on Greencastle Road. It is proposed to link to both sides of this Network for security of supply, and to locate 4 No. Substations within the development, one at each boundary
- 4.40 The immediate surroundings of the site are currently serviced by Eir and Virgin Media infrastructure, which it is proposed to extend within the site to meet the needs of the development. It is proposed to extend Fibre-to-the-Home to each unit within the development to provide the development with high-speed broadband, TV and telecommunication requirements. It is proposed to disconnect the existing supplies to the site prior to any works, and to divert any minor services passing through the site, which may service adjacent sites.

Pedestrian and Highway Improvements (DCC Land) – Phase 4

- 4.41 The following works are proposed as part of the overall planning application:
- Upgrading of the site and signals at the junction of Coolock Drive and Oscar Traynor Road;
 - Provision of a signalised pedestrian crossing to the south of the site entrance on Coolock Drive; and
 - Provision of a signalised pedestrian crossing at the proposed pedestrian entrance to the park off Greencastle Road.
- 4.42 The details of the proposed works have been subject to consultation with Dublin City Council, all of which have been agreed (see letter of consent appended to the cover letter of the planning application). Further details are set out in the TTA and Aecom's transport drawings.

Overall Programme of Works

- 4.43 It is currently estimated that Phases 1 to 4 would take approximately 36 months.

Site Coverage, Plot Ratio and Density

- 4.44 Table 4.6 sets out the site coverage, plot ratio and density of the proposed development for the lands proposed for residential development and associated amenities i.e. 3.61 hectares of land for which the applicant has an interest and where the built development is proposed:

Block	Site Coverage	Plot Ratio	Density
A1	1,125 sq.m	9,718 sq.m	137 dph
A2	1,125 sq.m	9,718 sq.m	
B	7,700.sq.m	26,914 sq.m	
C	4,626 sq.m	17,204 sq.m	
Creche, Cafe & Gym Service Building	485 sq.m	892 sq.m	
Total	15,061 sq.m	64,446 sq.m	
Percentage (total / site area)	42%	1.8	

Table 4.6 –Site Coverage, Plot Ratio and Density

5.0 Consistency with National Policy and Guidelines

- 5.1 This development has been prepared in response to the shortage of homes within Dublin, which in parallel seeks to utilise the redevelopment of this sustainably located, vacant brownfield site within the urban area of Dublin.
- 5.2 The proposed development is a “Build to Rent” proposal responding to the needs of the rental sector, by providing a viable long-term housing solution for those households where home-ownership may not be a priority currently. The remainder of this section is an assessment of the key planning policy matters for this proposal.

Rebuilding Ireland – Action Plan for Housing and Homelessness

- 5.3 Rebuilding Ireland was launched in 2016 with the objective to double the completion level of private housing to 25,000 additional homes each year from 2017 to 2021. It also includes a social housing programme of 47,000 units to 2021 to be delivered. At the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector.
- 5.4 Rebuilding Ireland is set around 5 no. pillars of proposed actions summarised as follows:
- **Pillar 1** – Address Homelessness: Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.
 - **Pillar 2** – Accelerate Social Housing: Increase the level and speed of delivery of social housing and other State – supported housing.
 - **Pillar 3** – Build More Homes: Increase the output of private housing to meet demand at affordable prices.
 - **Pillar 4** – Improve the Rental Sector: Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.
 - **Pillar 5** – Utilise Existing Housing: Ensure that existing housing stock is used to the maximum degree possible – focusing on measures to use vacant stock to renew urban and rural areas.

Statement of Consistency with pillars 2 and 3

- ✓ The proposed development is consistent with Pillar 2 because it will include provision for up to 10% that would be delivered as Part V, the details of which have been negotiated with Dublin City Council Housing Department. Please refer to the Part V letter from Dublin City Council which is enclosed with this planning application.
- ✓ The proposed development is consistent with Pillar 3 to build more homes. The proposed development provides for 495 no. new build to rent homes and, subject to planning permission being granted, will contribute towards the delivery of 25,000 residential units per annum in the short term.

National Planning Framework (February 2018)

- 5.5 The National Planning Framework is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

- 5.6 The NPF sets out that the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.

Compact Growth Strategy

- 5.7 The NPF sets out the new strategy for managing growth, and a major new policy emphasis on seeking to deliver compact development through renewing and developing existing settlements. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities on infill and/or brownfield sites. These include vacant and under-occupied buildings, with high housing and job densities, better serviced by existing facilities and public transport.
- 5.8 National Policy Objective (NPO) 2a seeks to target 50% of future population and employment growth to be focused in the existing five cities (which includes Dublin) and their suburbs. This objective is supplemented by NPO3a which seeks to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements, whilst NPO 3b targets at least 50% of all new homes in the five Cities and suburbs (including Dublin), within their existing built-up footprints.
- 5.9 NPO 11 states that in meeting urban development requirements, there will be a presumption in favour of development that encourage more people and generate more jobs and activity within existing cities, subject to development meeting appropriate planning standards and achieving targeted growth.
- 5.10 To achieve NP011, the supporting text states that in particular, it requires well-designed, high quality development that can encourage more people, and generate more jobs and activity within existing cities.

Statement of Consistency with the compact growth strategy

- ✓ The proposed development is a vacant, underutilised brownfield site located within the urban settlement of Dublin, near high quality public transport and also a range of existing services;
- ✓ It will contribute to the targets set out in NPO 2a, 3a, 3b and 11 is therefore consistent with each of these objectives of the NPF; and
- ✓ The Architectural Design Statement enclosed provides details of the current development demonstrating that it is consistent with this part of the NPO11.

Making Stronger Urban Places, Design and Height

- 5.11 NPO 4 states to "*ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well being*".

Statement of Consistency with making stronger urban places

- ✓ The proposed development will provide for a high quality residential scheme through the design quality and materials and finishes proposed. In addition, the proposed units meet or exceed the minimum apartment size requirement as stated in the 2018 Apartment Guidelines that will deliver well orientated spacious units;
- ✓ The proposed development also includes the provision of residential amenity communal amenity facilities, creche and café; and
- ✓ It is considered that the proposed development provides for the creation of an attractive, high quality, sustainable new neighbourhood within the existing built up area of the city. The provision of the new sustainable development is therefore consistent with the NPF objective.

- 5.12 Page 67 of the NPF states that to enable brownfield development, planning policies and standards need to be flexible, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases. Although sometimes necessary to safeguard against poor quality

design, planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes. This is in recognition of the fact that many current urban planning standards were devised for application to greenfield development sites and cannot account for the evolved layers of complexity in existing built-up areas.

5.13 In response to this matter, NPO13 sets out that

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

5.14 The infill / brownfield targets set out in NPOs 3a, b and 3c will necessitate a significant and sustained increase in urban housing output and apartment type development in particular. The NPF states that it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.

5.15 The NPF also notes that the economics of apartment construction can be more challenging than that of conventional housing. A major priority for the NPD is meeting the housing requirements arising in major urban areas for people on a range of incomes. NPO35 therefore states to:

*“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development scheme, area or site-based regeneration and **increased building heights**”.* (our emphasis)

Statement of Consistency of Design and Height

- ✓ There is a strong emphasis towards increased building heights from a national policy perspective in appropriate locations within existing urban centres and along public transport corridors; and
- ✓ This site is within the urban centre of Dublin, along a public transport corridor, which will be of high quality design, as evidenced in the accompanying material.
- ✓ As such it is respectfully submitted that the proposed building height up to a maximum of 10 no. storeys from ground level, measuring a maximum of 30.745m in height from the ground level is consistent with government guidance and emerging trends for sustainable residential developments to deliver the targets set out in the NPF. Please refer to the supporting documents demonstrating that the proposed development adheres to the performance based criteria.

National Residential Design Standards

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

5.16 Section 2 of the Building Height Guidelines states that the implementation of the National Planning Framework requires increased density, scale and height of development in town and city cores, including an appropriate mix of both the living, working, social and recreational space we need in our urban areas.

5.17 Paragraph 2.3 states that whilst achieving high density does not automatically and constantly imply taller buildings alone, increased building height is a significant component in making optimal use of

the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability.

- 5.18 Paragraph 2.11 states that areas, particularly those in excess of 2 hectares should be accompanied by an appropriate master-planning exercise
- 5.19 The Building Height Guidelines contain 4no. Specific Planning Policy Requirement's (SPPR), 3no. (SPPR1 and SPPR3) are relevant in the consideration of this planning application. SPPR1 seeks to support increased building height and density in locations with good public transport accessibility to secure the objectives of the NPF and RSES and shall not provide for blanket numerical limitations on building height

Building Height and the Development Management Process

- 5.20 Section 3 of the Building Height Guidelines contains guidance on the assessment of individual planning application, and it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in town / city cores and in other urban locations with good public transport accessibility.
- 5.21 The matters that the development criteria that an applicant shall demonstrate to the satisfaction of the Planning Authority / An Bord Pleanala is set out in Table 5.1 of this report. SPPR3 states that:
- A. *1. An applicant for planning permissions set out how a development proposals with the criteria above; and*
2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines

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

- 5.22 The material contravention statement cross refers to the Urban Development and Building Height Guidelines, as the proposed development materially contravenes the DCC DP in this instance, and, where policies of the adopted development plan conflicts with the NPF and these guidelines, as long as the proposal accords with the performance based criteria, then permission should be granted.

Statement of Consistency with the Urban Development and Building Height Guidelines

Policy / Criteria Heading	Detailed Criteria	Response
SPPR1	Support increased building height and density in locations with good public transport accessibility to secure the objectives of the NPF and RSES and shall not provide for blanket numerical limitations on building height	<ul style="list-style-type: none"> ✓ Yes the site is well served by public transport, with high capacity, frequent service and good links to other modes of public transport ✓ Please refer to Aecom's TTA for full details ✓ At a density of 137 dwellings per hectare, the proposed development is in accordance with achieving a minimum density of 45 dph in intermediate urban locations.
At the scale of the relevant city / town	The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport	<ul style="list-style-type: none"> ✓ This has been achieved in parallel with adhering to the performance-based criteria, and therefore meets the NPF and RSES objective for delivering more compact forms of urban development on this brownfield site
	Development proposals incorporating increased building height should successfully integrate into/enhance the character and public realm of the area, having regard to topography, setting of key landmarks and protecting key views. Such development proposals should undertake a landscape and visual assessment	<ul style="list-style-type: none"> ✓ The proposed development is responding to the NPF by proposing a more compact form of development ✓ It enhances the character and provides public realm improvements, including the provision of a parkland area which would be publicly accessible during daylight hours, consistent with other surrounds parks managed by DCC ✓ A landscape and visual assessment has been prepared, which demonstrates that there is a lack of visibility except when close by. The close effects are mitigated by the architectural planning form, proportion and finishes. ✓ The visual impact is further considered in the landscape context as a positive contribution of public open space, connectivity of the Santry River corridor and permeability across the site with its associated amenities ✓ Full details of the LVIA are contained in the EIAR which accompanies this planning application
	On larger urban redevelopment sites, proposed development should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape;	<ul style="list-style-type: none"> ✓ The schemes urban design and architecture will have a role in helping an area to form a strong character. The scheme provides a positive opportunity to create identity through density and height as well as providing quality amenities that will serve the local community. ✓ Quality materials and thoughtful attention to details provide a sense of place at the street level. ✓ Consideration has been given to elevations to ensure buildings are coherent while having distinctive characteristics. ✓ The proposed development has its own distinct identity while making a positive contribution to the local area.
At the scale of district neighbourhood / street	The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	<ul style="list-style-type: none"> ✓ Public and semi-public areas are well defined and overlooked. ✓ Ground floor housing units present and active frontage to the streetscape and provide a sense of security. ✓ The scheme provides a generosity of dimension to streets and courtyards in keeping with a sub-urban character

Statement of Consistency with the Urban Development and Building Height Guidelines

Policy / Criteria Heading	Detailed Criteria	Response
	The proposal is not monolithic and avoids long, uninterrupted walls of building	<ul style="list-style-type: none"> ✓ The site layout allows for visual connections to a public park through the use of axial route that bisect the site and through leaving strategic 'gaps' in the massing of buildings. ✓ The layout of the project is designed around creating a permeable network of direct routes, where pedestrian, cycle and vehicular facilities are integrated. ✓ The proposed scheme will be predominantly brick-based which will be varied in finish to avoid monotony. The elevations will be broken with the insertion of white stone on taller elements of the buildings to provide visual relief within the scheme.
	The proposals enhances the urban design context for public spaces and key thoroughfares and inland waterway frontage, thereby enabling additional height in development form	<ul style="list-style-type: none"> ✓ The large scale rhythm of the taller vertical elements will present an immediately recognisable place-marker within the local area. These apartments overlooking the park will enjoy a high quality aspect and will enjoy a sense of ownership over the green space. ✓ The public open space north of the proposed development will act as a green link to the existing Stardust Memorial Park. The existing Stardust Park which is directly adjacent to the site currently offers numerous amenities such as a designated play area with play items for a range of age groups, exercise equipment, an astro turf 7 aside pitch, sculptural elements and numerous walking/running routes around and along the existing water course.
	The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner	<ul style="list-style-type: none"> ✓ The scheme makes connections to the neighbouring landscape specifically the public park ✓ Public spaces are easily accessible and identified to all residents and have been designed with a user-centred approach, particularly for the needs of pedestrians.
	The proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood.	<ul style="list-style-type: none"> ✓ The apartment mix adds choice to the local area which is predominantly suburban houses. ✓ The proposal will include 2 and 3 bed duplex units and apartments ranging in size from studio to 3 bed. Mixed communities are best created by providing a range of unit types.
At the scale of the site / building	<p>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</p> <p>Regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'</p>	<ul style="list-style-type: none"> ✓ A Sunlight, Daylight and Overshadowing Assessment has been prepared by Metec. ✓ In terms of Daylight, 97% of the 580 rooms assessed in the 202 apartments analysed achieve the BRE Guidelines ✓ This assessment primarily focused on apartments that would be considered "worst case" in terms of receiving obstructions to daylight (i.e. the lower floors). If all apartments were analysed, i.e. with the inclusion of more of the upper floors, the percentage pass rate would increase further because the Average Daylight Factor of the upper floors are even less obstructed ✓ In those apartments that do not fully meet this criteria, the following compensatory measures are proposed: <ul style="list-style-type: none"> ○ Units have an apartment floor area that is $\geq 10\%$ larger than the design standards for new apartments;

Statement of Consistency with the Urban Development and Building Height Guidelines

Policy / Criteria Heading	Detailed Criteria	Response
	<p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanala should apply their discretion, having regard to local factors including site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution</p>	<ul style="list-style-type: none"> ○ A high proportion of glazing is provided to all units. Specification of glazing with a high glazing transmittance value to ensure maximum light penetration into apartments ○ Balcony space exceeds the design standards referenced in the March 2018 apartment guidelines; and ○ 27% of the units noted as being short of the target daylight values are dual aspect. ✓ Sunlight (Amenity Spaces – Gardens & Open Spaces) <ul style="list-style-type: none"> ○ Sunlight in amenity spaces is achieved for this proposed development, as all central courtyards exceed the recommended sunlight levels ✓ Solar Shading of existing adjacent properties <ul style="list-style-type: none"> ○ Whilst additional shade was identified (please refer to the Sunlight, Daylight and Overshadowing Assessment) the results of the VSC and sunlight simulation have demonstrated that the guidelines for maintaining light received by existing buildings with the proposed development in place have been achieved ✓ Potential adjoining development land <ul style="list-style-type: none"> ○ The BRE recommended criteria for safeguarding the diffuse daylighting potential of the neighbouring lands is achieved ✓ Ventilation <ul style="list-style-type: none"> ○ The design intent is to provide ventilation by means of Mechanical Ventilation with Heat Recovery (MVHR) units. Additionally, all apartments will have openable windows therefore natural ventilation will also be possible ✓ Views <ul style="list-style-type: none"> ○ The Landscape and Visual Impact Assessment demonstrates that there is a lack of visibility except when close by. The close effects are mitigated by the architectural planning form, proportion and finishes. ○ The visual impact is further considered in the landscape context as a positive contribution of public open space, connectivity of the Santry River corridor and permeability across the site with its associated amenities ✓ Therefore, proposed development provides a comprehensive urban regeneration and effective urban design and streetscape solution
Specific Assessments	<p>Specific impact assessment of the micro-climatic effects such as downdraft. Assessments shall include measures to avoid / mitigate such as micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered</p>	<ul style="list-style-type: none"> ✓ A micro-climate wind assessment has been prepared by Metec Consulting Engineers and submitted with this application which demonstrates that <ul style="list-style-type: none"> ● Pedestrian comfort is achieved in all areas of the site in summer; ● In winter, the site is subject to higher and more frequent winds from the southwest which means pedestrian areas in-between Block B and Block C, in-between Block A1 and Block A2, and areas at the west corner of the service building have higher than desirable wind speeds;

Statement of Consistency with the Urban Development and Building Height Guidelines

Policy / Criteria Heading	Detailed Criteria	Response
		<ul style="list-style-type: none"> • A limited number of areas of the site were identified as being uncomfortable for pedestrians in the worst-case winter season. These were identified to be south of the pedestrian spaces in-between Block B and Block C, and the southern corner of Block C; • No areas of the site exceed the Lawson distress threshold for able-bodied pedestrians; • There are areas that receive less frequent winds that exceed the 15m/s distress threshold for vulnerable pedestrians: <ul style="list-style-type: none"> ○ South of the pedestrian areas in-between Block B and Block C; ○ The pedestrian areas in-between Block A1 and Block A2; ○ West corner of the service building; and ○ Small areas at the southernmost corner of the site. • The distress threshold wind speed of 15m/s for vulnerable pedestrians was found to occur for no more than 5 hours annually in the worst case area i.e. South area in-between Block B and Block C. <p>However, with the introduction of the proposed landscape masterplan, it is expected all pedestrian spaces outlined above to be safe for their purpose of use.</p>
	An Urban Design Statement	✓ An Architectural Design Statement, prepared by Plus Architecture is submitted with this application, which demonstrates the acceptability of the proposed design
	Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate	✓ An Environmental Impact Assessment Report and Natural Impact Statement accompany this planning application.
SPPR3		✓ It is submitted that the proposed development is in accordance with national policy, and if the planning authority (in the case An Bord Pleanála agrees), then permission should be granted, even though the proposed development is higher than the DCC DP prescribes

Table 5.1 – Statement of Consistency with Urban Development and Building Height Guidelines

Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities (March 2018)

5.23 The Apartment Guidelines (March 2018) provide updated guidance on apartment developments in response to the Draft National Planning Framework and Rebuilding Ireland and replace the 2015 Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities. Much of the previous guidelines remains valid, particularly those matters regarding design quality safeguards such as internal space standards for 1,2 and 3-bedroom apartments, floor to ceiling height, internal storage and amenity space.

5.24 To respond to the residential delivery targets, set out in the National Planning Framework, the guidelines have been amended to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures. Paragraph 1.10 refers to those parts of the previous guidelines that have been amended and new addressed in order to:

- Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;
- Make better provision for building refurbishment and small scale urban infill schemes;
- Address the emerging “build to rent” and “shared accommodation” sectors; and
- Remove requirements for car parking in certain circumstances where there are better mobility solutions and to reduce costs.

5.25 Section 2 of the SUHNA refers to three location types, namely central and / or accessible urban locations, intermediate urban locations and peripheral and / or less accessible urban locations.

5.26 The criteria for “intermediate urban locations” are set out as follows:

“Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprises apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net) including:

- *Sites within or close to i.e. within reasonable walking distance (i.e up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.*

The range of location is not exhaustive and will require local assessment that further considers these and other relevant planning factors”

5.27 To demonstrate that the site is an intermediate urban location, the following steps have been undertaken:

1. Evidence of significant employment locations within 10 minutes or 800m – 1,000m walk of the site;
2. Evidence demonstrating that there is a high capacity urban public transport stop or high frequency urban bus services within walking distance of the site; and

3. Evidence demonstrating the site is within easy walking distance of a reasonably frequent urban bus service.

Criteria 1 - Principal Centre / Suburban Centres / Significant employment locations

- 5.28 The first bullet point refers to sites being within a 10 minute or up to 1,000m walking distance of principle city centre or suburban centres or employment locations, with hospitals and third level institutions referred to as examples.
- 5.29 Within Ireland there are three different types of hospital, namely:
- Health Service Executive (HSE) hospitals, owned and funded by the HSE.
 - Voluntary public hospitals, most of whose income comes from State funds. Other voluntary public hospitals are incorporated by charter or statute and are run by boards often appointed by the Minister for Health.
 - Private hospitals, which receive no State funding.
- 5.30 The third-level education institutions sector in Ireland consists of universities, institutes of technology, and colleges of education - collectively known as higher education institutions or HEIs. Third-level qualifications are Levels 6-10 in the National Framework of Qualifications (NFQ).
- 5.31 For the purposes of this application, the following table provides evidence of employment levels within a range of hospitals and third-level institutions in Dublin. The employment figures referred to in Table 5.1 were estimated from the CSO Workplace Zones as identified on CSO website (<http://census.cso.ie/p11map41/>).
- 5.32 The estimates are rounded to the nearest 50 employees.

Location	Type	Employment Estimate
DCU	3 rd Level	3000
DIT- Bolton St	3 rd Level	500
DCU St Patricks College	3 rd Level	450
Blanchardstown IT	3 rd Level	400
Riversdale Community College	3 rd Level	400
DIT Grangegorman	3 rd Level	300
Marino College	3 rd Level	300
Ballyfermot College	3 rd Level	250
Beaumont Hospital	Hospital	3000
Blanchardstown Hospital	Hospital	1800
Rotunda Hospital	Hospital	1000
Cherry Orchard Hospital	Hospital	850
Cappagh Hospital	Hospital	400

Table 5.1 – Significant Employers

- 5.33 This shows that, apart from DCU, third level institutions employ up to 500 people. In the case of hospitals, this ranges from 400 to 3,000 people.
- 5.34 Within 1,000m of the proposed development site is the Colaiste Dhulaig College, which is defined as a third level institution, which, along with Northside Shopping Centre collectively employ c. 600 people.

Using Table 5.1 as a guide to determine what level of employment could be defined as “significant”, there are the following locations within 1,000m walk of the site:

Location	Type	Employment	Distance from Site
Cadburys	Other	600	850m
Malahide Road Industrial Park	Other	1000	450m
Coolock Village	Other	550	900m
Northside Shopping Centre and Colaiste Dhulaig	3 rd Level	600	750m

Table 5.2 – Proximity of site to Significant Employment and Suburban Centres

Criteria 2 / 3 - Proximity to High Frequency urban bus services and reasonably frequent urban bus services

- 5.35 Section 3.5 of the TTA considers the matter of the location of development. It states that based on the assessment outlined within this Chapter, it is evident that the proposed site location benefits from an array of existing and future sustainable transport infrastructure, which concludes that the site is considered to fall into the “Intermediate Urban Location” category. Sustainable travel to the site will be a viable mode of travel, thus reducing the reliance on private vehicular modes to access the site.
- 5.36 Therefore, based on this assessment, and supporting evidence contained in the SIA and TTA, it is considered that the site can be regarded as being located in an “Intermediate Urban Location” as defined in the Apartment Guidelines (March 2018).

Statement of consistency on density

- ✓ The density proposed in this planning application is 137 dwellings per hectare, which is considered appropriate for this intermediate urban location, when assessed with other factors, such as:
 - Sunlight, daylight and overshadowing;
 - Landscape and Visual Impact;
 - Microclimatic (wind); and
 - Transport

The details of those assessments are enclosed as part of this SHD Build to Rent planning application, and summarised later in this report.

Build to Rent

Qualifying development and communal facilities

- 5.37 The proposed development is a “Build to Rent” proposal responding to the needs of the rental sector, by providing a viable long-term housing solution for those households where home-ownership may not be a priority now.
- 5.38 Specific Planning Policy Requirement (SPPR) 7 refers to the need for the proposal to be accompanied by a covenant or legal agreement which could then include appropriate planning conditions to 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.

- 5.39 A legal covenant is submitted with this application and can be attached as a planning condition to a planning permission (should it be granted by ABP), to ensure that the site remains owned and operated by an institutional entity for a minimum period of not less than 15 years, and that no individual residential units are sold or rented separately for that period.
- 5.40 SPPR7 also refers for the need for detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development, with facilities categorised as:
- (i) *Resident Support Facilities – comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance / repair services, waste management facilities, etc*
 - (ii) *Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV / lounge areas, work / study spaces, function rooms for use as private dining and kitchen facilities etc*
- 5.41 Paragraph 5.11 of the Apartment Guidelines (March 2018) refers that the provision of specific BTR amenities to renters will vary and the developer will be required to provide an evidence basis that the proposed facilities are appropriate to the intended rental market. The proposed development includes a range of resident support facilities and resident services and amenities. A breakdown on a Block by Block basis is set out below:

Block / Building	Proposed use by sq.m									Overall total by Block / Building (sq.m)
	Function Room	Games room	Dining Area	Study Hub	Communal Work Area	Homework Club	Concierge	Bins	Store	
Basement								1067		1067
A1	110						38	19		167
A2	110						38	19		167
B		34	100	97			96	181	127	635
C					77.5	32	88	33		230.5
Overall total by use	220	34	100	97	77.5	32	260	1319	127	2226.5

Table 5.4 – Resident Support Facilities and Resident Services and Amenities per block

Statement of Consistency of qualifying development and communal facilities

- ✓ Platinum Land Ltd has included a legal covenant with this application and can be attached (or form the basis) of a planning condition to a planning permission (should it be granted by ABP)
- ✓ The development includes a range of resident support facilities and resident services and amenities which are considered appropriate to support the future residents of this proposed Build to Rent development

Housing Quality Assessment

5.42 A detailed housing quality assessment accompanies this planning application which demonstrates compliance of the proposed development with the 2018 Apartment Guidelines. The following tables collectively demonstrate that the proposed development meets the Apartment Guidelines (March 2018) in respect of the following matters:

- Area of the studio, 1 bedroom, 2 bedroom and 3 bedroom apartments;
- Minimum aggregate floor areas for living / dining / kitchen rooms, and minimum widths for the main living / dining rooms;
- Minimum bedroom floor areas / widths; and
- Minimum aggregate bedroom floor area.

Matter	Apartment Type	Apartment Guidelines (March 2018) Requirements (in sq.m)	Proposed Development		Compliant?
			Minimum	Maximum	
Overall Apartment Area	Studio	37	40.5	62	Yes
	1 bed	45	46.5	76.85	Yes
	2 bed(3pp)	63	72.7	75.5	Yes
	2 bed	73	75.5	142.8	Yes
	3 bed	90	98	148	Yes
Kitchen / Living / Dining	Studio	30	30	41.1	Yes
	1 bed	23	23	35	Yes
	2 bed(3pp)	28	29.4	29.4	Yes
	2 bed	30	30	57.3	Yes
	3 bed	34	34	47.6	Yes
Storage	Studio	3	3	7.8	Yes
	1 bed	3	3	12.9	Yes
	2 bed(3pp)	5	5	5.7	Yes
	2 bed	6	6	15.9	Yes
	3 bed	9	9	17.9	Yes
Balcony (Private Amenity Space)	Studio	4	4	8.4	Yes
	1 bed	5	5	7.8	Yes
	2 bed(3pp)	6	7.8	7.8	Yes
	2 bed	7	7	48.2	Yes
	3 bed	9	9	62.3	Yes

Table 5.5 – Summary of overall apartment area, KLD, storage and balcony areas provide

Matter	Apartment Type	Apartment Guidelines (March 2018) Requirements (in sq.m)					Proposed Development	Compliant?
		Minimum width	Single bedroom	Double bedroom	Twin bedroom	Minimum floor area	Minimum areas provided for	
Minimum bedroom floor areas / widths	Studio	4m*	N/A	N/A	N/A	30**	30	Yes
	1 bed	N/A	2.1m			11.4	11.4	Yes
	2 bed(3pp)	N/A	2.1	2.8	2.8	13 (twin) 7.1 (Single)	14.8 8.2	Yes
	2 bed	N/A	2.1	2.8	2.8	11.4 (double) 13 (twin)	11.4 13	Yes
	3 bed	N/A	2.1	2.8	2.8	11.4 (double) 13 (twin) 7.1 (Single)	11.4 13 7.1	Yes
Aggregate bedroom floor areas	Studio	N/A	N/A	N/A	N/A	N/A		Yes
	1 bed	N/A	N/A	N/A	N/A	11.4	11.4	Yes
	2 bed(3pp)	N/A	N/A	N/A	N/A	13+7.1 = 20.1	20.1	Yes
	2 bed	N/A	N/A	N/A	N/A	11.4+13 = 24.4	24.4	Yes
	3 bed	N/A	N/A	N/A	N/A	11.4+13+7.1 = 31.5	31.5	Yes

Table 5.6 – Summary of bedroom sizes proposed

Matter	Apartment Type	Apartment Guidelines (March 2018) Requirements (in sq.m)	Proposed Development			
			Minimum floor area	Apartment breakdown	Total required	Total Provided
Floor areas for communal amenity space	Studio	4	61	244	4260 (average of 19sq.m per apartment)	Yes
	1 bed	5	150	750		
	2 bed(3pp)	6	3	18		
	2 bed	7	175	1225		
	3 bed	9	106	954		
Total			495	3191		

Table 5.7 – Floor areas for communal amenity space

Mix

- 5.43 With respect to Mix, amenity space, car parking, floor area and core, SPPR 1 states that apartment developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios).
- 5.44 SPPR8 states that for proposals that qualify as specific BTR development in accordance with SPPR7, the following is applicable
- (i) *No restriction on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise*

Statement of Consistency on Mix

- ✓ In the case of this BTR planning application, whilst there is no restriction on the dwelling mix (as set out in SPPR1), in this case Platinum Land have taken the decision to be consistent with SPPR8 (i) and SPPR1, the details of which are set out below

No. of Beds	No. of units	Percentage overall number	of SPPR1 Requirement	Consistent?
Studio	61	12.32%	42.62% overall No more than 20-25% Up to 50% one bedroom or studio	✓
1 bed	150	30.30%		✓
2 bed	178	35.96%	N/A	✓
3 bed	106	21.41%	No minimum	✓

Table 5.8– Development Mix and compliance with SPPR1 and SPPR8

- (ii) *Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases 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*

Statement of Consistency with storage and private amenity space

- ✓ The Housing Quality Assessment enclosed with this application demonstrates compliance of the proposed development with the relevant quantitative standards on storage and private amenity space as required under the 2018 Apartment Guidelines.

- (iii) *There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;*

5.45 Paragraph 4.21 states that in intermediate urban locations which is served by public transport, particularly for housing schemes with more than 45 dwellings per hectare (net), (such as this site), planning authorities must consider a reduced overall car parking standard.

5.46 The site is located in area 3 of the DCC DP, which states that there should be a maximum of 1.5 spaces per unit. The TTA demonstrates that it is suitable for substantially reduced car parking provision on this site because the proposed development site is in close proximity to public transport services which will have a strong central management regime.

Statement of Consistency of parking

- ✓ The evidence submitted as part of this planning application demonstrates that proposed development is appropriate to provide 0.79 spaces per unit, or when factoring in other parking provision for car club and the creche, 0.82 spaces is acceptable.
- ✓ This is a substantial reduction (c. 55%) of car parking provision policy as defined in the DCC DP, the details which have been agreed by the Council. Please refer to the TTA for more details on the matter.

Apartment Size

5.47 SPPR 3 states that the minimum apartment floor areas:

- Studio apartment (1 person) – 37 square metres;
- 1-bedroom apartment (2 persons) – 45 square metres;
- 2-bedroom apartment (4 persons) – 73 square metres; and
- 3-bedroom apartment (5 persons) – 90 square metres.

5.48 In addition, Appendix 1 of the Apartment Guidelines (March 2018) refer to:

- Minimum aggregate floor areas for living / dining / kitchen rooms, and minimum widths for the main living / dining rooms
- Minimum bedroom floor areas / widths
- Minimum aggregate bedroom floor area

Statement of Consistency on apartment size

- ✓ All the proposed apartments meet these standards, with c.77% being 10% larger than the minimum requirements.
- ✓ Please refer to the housing quality assessment that demonstrates compliance of this proposal with the 2018 apartment guidelines.

Dual Aspect

5.49 SPPR4 requires that in suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

Statement of Consistency on dual aspect

- ✓ This development includes c.65% dual aspect apartments and therefore complies with SPPR4 of the Apartment Guidelines (March 2018).

Part V Requirements

5.50 Part V requirements under the Planning Act (as amended) apply to Build to Rent developments. The DHPCLG Housing Circular 36 2015, Section 96 (3) sets out 6 types of Part V agreement that may be made, which include:

1. *Transfer of lands (section 96(3), paragraph (a));*
2. *Build and transfer of up to 10% of the proposed housing units (section 96(3), paragraph (b)(i));*
3. *Transfer of housing units on any other land in the functional area of the planning authority (Section 96(3), paragraph (b)(iv));*
4. *Lease of housing units either on the site subject to the application or in any other area within the functional area of the planning authority (section 96(3), paragraph (b)(iva));*
5. *Combination of a transfer of land and one of more of the other options; and*
6. *Combination of options not involving a transfer of the ownership of land (section 96(3), paragraph (b)(viii)).*

5.51 Platinum Land Ltd consulted the matter with Dublin City Council Housing Department on the 20th September 2018, and again on the 15th March 2019. A validation letter (dated 15th March 2019) from Dublin City Council is enclosed with this planning application.

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

- 5.52 The aim of these guidelines is to set out the key planning principles, which should be reflected in development plans and local area plans, and which should guide the preparation and assessment of planning applications for residential development in urban areas.
- 5.53 Chapter 5 (Cities and larger towns) refers to the 1999 guidelines which promotes increased residential densities in appropriate locations. In the context of six criteria outlined in the Residential Development in Urban Area Guidelines, the proposed development site falls within the following criteria:
- *c) public transport corridors* due to its close proximity to public transport (please refer to the transport assessment for further evidence), and
 - *d(i) infill residential development* due to it being an unused and derelict site.

Density

- 5.54 In the context of lands defined as within public transport corridors, section 5.8 of the Residential Development in Urban Area Guidelines states that, in general, **minimum** net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes.
- 5.55 Table 5.9 demonstrates how the proposal is consistent with the relevant policy, principle and guidelines of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas:

Reference	Relevant Guideline / Checklist Question	Statement of Consistency
Paragraph 2.1 – Plan led approach	Scale, nature and location of development	✓ The residential development is proposed on lands zoned for residential use, by way of variation number 5 to the DCDP (2016-22)
Paragraph 2.3 Sequential approach	The development plan should identify where practicable the sequential and co-ordinated manner in which zoned lands will be developed	
Chapter 3 – The Role of Design	Have the 12 criteria set out in the companion Best Practice Urban Design Manual been used both in pre-application consultations and in assessing applications?	✓ Please refer to the Architectural Design Statement which demonstrates compliance with the 12 criteria.
	Have designers of urban housing schemes carried out a site appraisal prior to preparing a layout?	<ul style="list-style-type: none"> ✓ Yes, the designers undertook a site appraisal and are familiar with the site, as well as being informed by survey undertaken on behalf of the applicant ✓ A Site investigation has been undertaken and enclosed with this planning application. The details of that assessment have been undertaken in the formulation of this planning application. ✓ A Social Infrastructure Audit of local services and amenities has been undertaken and submitted with this planning application. ✓ A confirmation of feasibility accompanies this submission.

Reference	Relevant Guideline / Checklist Question	Statement of Consistency
	<p>Is the standard of design of a sufficiently high standard? If the design would result in a poor quality environment, do the reasons for refusal make it clear how any revised design needs to be improved?</p> <p>Does the design of residential streets strike the right balance between the different functions of the street, including a “sense of place”?</p>	<ul style="list-style-type: none"> ✓ Yes, a high-quality development befitting the location and the character of the site has been prepared. We believe the team have delivered this in a design which complies with design guideline requirements. ✓ The development will deliver a high-quality living environment for future residents. ✓ Please refer to the Architectural Design Statement prepared by Plus Architecture for further details
Chapter 4: Planning for sustainable neighbourhoods	Are the lands proposed for development in accordance with the sequencing priorities set out in the development plan or local area plan?	✓ Yes. The land proposed for residential development is zoned for residential use. It is a vacant brownfield site, within the urban area of Dublin, and therefore its redevelopment for residential use is afforded the highest priority in the development plan, as well as national planning policy.
	Has an assessment of the capacity of existing schools or the need for new school facilities been carried in connection with proposals for substantial residential developments?	✓ Yes. Please refer to the social infrastructure audit for details of the work undertaken to demonstrate that overall there is sufficient school facilities to cater for the proposed development
	Input of other necessary agencies.	<ul style="list-style-type: none"> ✓ Yes. A Pre-connection Enquiry Application was submitted to Irish Water and confirmation of feasibility accompanies this submission. ✓ Discussions and liaison with DCC highways, planning, housing departments
	Appropriate range of community & support facilities.	✓ Yes. An audit was undertaken of local amenities and demonstrates that the subject site is proximate to a range of community and support facilities
	Will the development:	<ul style="list-style-type: none"> ✓ Yes. The development is located in close proximity to existing bus stops, and provides for links through the development site, and provides connections to the surrounding area ✓ High quality managed public open space is proposed within the development. Please refer to landscape drawings for further details
	Prioritise public transport, cycling and walking.	
	Ensure accessibility for everyone	
	Include right quality & quantity of public open space.	<ul style="list-style-type: none"> ✓ The development adheres to DMURS and therefore includes satisfactory measures regarding traffic safety ✓ The proposed development is responding to the needs of the rental market, proposing a mix of studio, 1, 2- and 3-bedroom apartments ✓ The proposal also includes part V provision to meet the requirements of DCC
	Include measures for satisfactory standards of personal safety and traffic safety.	
Promote social integration, provide for diverse range of household types, age		

Reference	Relevant Guideline / Checklist Question	Statement of Consistency
	groups and housing tenures.	
	Protect and where possible enhance the built and natural heritage.	✓ The proposal is supported by a range of measures that protects the built and natural heritage.
	Provide for Sustainable Drainage Systems.	✓ Sustainable Drainage is provided for in the proposed development

Table 5.9 – Consistency with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas

Urban Design Manual (UDM) – A Best Practice Guide (2009)

5.56 The Urban Design Manual is a companion document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas. The publication of the document signalled a commitment to improving the standard of housing design across the country. The Guide is based around 12 Criteria that have been drawn up to encapsulate the range of design considerations for residential development. These criteria are as follows:

1. Context: How does the development respond to its surroundings?
2. Connections: How well connected is the new neighbourhood?
3. Inclusivity: How easily can people use and access the development?
4. Variety: How does the development promote a good mix of activities?
5. Efficiency: How does the development make appropriate use of resources, including land?
6. Distinctiveness: How do the proposals create a sense of place?
7. Layout: How does the proposal create people friendly streets and spaces
8. Public Realm: How safe, secure and enjoyable are the public areas?
9. Adaptability: How will the building cope with change?
10. Privacy and Amenity: How does the scheme provide a decent standard of amenity?
11. Parking: How will the parking be secure and attractive?
12. Detailed Design: How well thought through is the building and landscape design?

5.57 The Architectural Design Statement demonstrates how the proposed development complies with the UDM, which also directly responds to An Bord Pleanála's Pre Application Consultation Opinion (numbers 1 to 3 inclusive).

Design Manual for Urban Roads and Streets

5.58 DMURS provides guidance relating to the design of urban roads and streets. The Manual seeks to address street design within urban areas (i.e. cities, towns and villages) and aims to put well designed streets at the heart of sustainable communities. Well-designed streets can create connected physical, social and transport networks that promote real alternatives to car journeys, namely walking, cycling or public transport.

5.59 The principles, approaches and standards apply to the design of all urban roads and streets (that is streets and roads with a speed limit of 60km/h or less), except to those listed in paragraph 1.3(a and b) of DMURS.

5.60 The proposed internal residential roads have been designed as local streets in accordance with the Design Manual for Urban Roads and Streets (DMURS) and therefore been designed to be meet the needs of walking and cycling uses as well as transport by private car. A more detailed response to DMURS is included in the TTA.

National Guidelines on Childcare Provision

Guidelines for Planning Authorities on Childcare Facilities

- 5.61 The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations.
- 5.62 These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.
- 5.63 The proposed development at 495 no. units therefore sets a requirement of 36 no. childcare spaces. The following definition of Childcare is included in the Guidelines:
- “In these Guidelines, “childcare” is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus services such as pre-schools, national (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.”*
- 5.64 The number of potential pre-school aged children has been calculated as follows:
- $495 \text{ (total no. of units)} - 61 \text{ (studio)} - 150 \text{ (1 bed apartment)} = 284 / 75 = 3.79 \times 20 = 76$ children (rounded up).
- 5.65 Therefore, it is estimated that c. 76 children of pre-school age may be generated from the proposed development, and to allow some flexibility, the creche area of the service building has been designed to accommodate c. 80 children.

6.0 Consistency with Regional Planning Policy

Regional Planning Guidelines for the Greater Dublin Area (RPG): 2010-2022

- 6.1 The RPG is the policy document which aims to direct the future growth of the Great Dublin Area (GDA) and works to implement the strategic planning framework set out in the National Spatial Strategy. It informs and directs the City and County Development Plans of each of the Council's in the GDA.
- 6.2 The site that is subject to this application is located within the existing urban footprint of the Metropolitan Area of Dublin, which is defined in section 4.6 of the RPG as Dublin City Centre, its immediate suburbs and the built-up areas outside of Dublin City centre, including a number of proximate major existing towns which are strongly integrated and connected with the built up area of Dublin.
- 6.3 The 5th bullet point of 2.2 states that development within this area will be *"consolidated to achieve a more compact urban form, allowing the accommodation of a greater population than at present, with much-enhanced public transport system, with the expansion of the built up areas providing for well designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike"*.
- 6.4 This is also reflected in 4.6 which states that the *"policy emphasis for the Metropolitan Area is to gain maximum benefit from existing assets – public transport, social, infrastructural – through the continuation of consolidation and increasing densities within the existing built footprint of the City, suburbs.."*
- 6.5 Strategy Policy 1 (Settlement Strategy) encourages focusing new housing development on (i) consolidation within the existing built footprint with a particular focus on the metropolitan area. Part (iii) supports national investment in public transport services by focusing new developments areas to key locations to achieve the integration of land use and high quality public transport provision.
- 6.6 Section 6.3.1 (Public Transport), sets out to achieve the target for modal shift in travel patterns to "greener transport" it identifies five (no.) measures to direct and integrate land use with investment in public transport including *"1) focusing new development into sustainable compact urban areas served by high capacity and well developed public transport systems."*

Statement of Consistency with the RPG

- ✓ The subject site is a key brownfield site within the metropolitan area of Dublin. The site is located within 500m of the proposed BRT route on Malahide Road, as well as adjacent to existing bus service at Greencastle Road and Coolock Drive.
- ✓ The proposed development is therefore in a sustainable and accessible location, and its development is consistent with the objectives of the RPG, in particular the emphasis to consolidate the metropolitan area and promote residential development close to existing services and public transport links.
- ✓ The appropriateness of the site for residential development is reflected in the land use zoning objective (see section 7) and the existing pattern of the development in the area.

- 6.7 The current Guidelines will continue to have effect until the Regional Spatial and Economic Strategy is prepared and adopted by the regional assembly.

Draft Regional Spatial & Economic Strategy – Eastern & Midland Regional Assembly

- 6.8 The purpose of the RSES is to support the implementation of the National Planning Framework, and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the regions.
- 6.9 It will take a strategic approach over a 12-20-year period and covers nine counties containing twelve local authorities, including Dublin City Council. The region includes 3 sub regions or Strategic Planning Areas (SPAs), namely the Midland, Eastern and Dublin (see Figure 5.1 below):



Figure 6.1– The Regional Assemblies and Eastern and Midland Region

- 6.10 Section 4 (People and Places) states that at the core of the RSES will be the consideration of a settlement hierarchy for the region, which sets out the key location for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs.
- 6.11 Dublin leads the settlement hierarchy for not only the region but also the state, with no other comparable settlement within the nation’s urban system.
- 6.12 Table 6.2 demonstrates how the proposal is consistent with the relevant policy, principle and guidelines of the emerging RSES

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Environmental Assessment	RPO 3.3: Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.	✓ The lands proposed for residential development are zoned for development, through Variation No.5 of the DCCDP. The principle has therefore been accepted for this use, whilst other detailed matters such as landscape, cultural heritage, water quality, flood risk and biodiversity are assessed as part of this planning application
Settlement Strategy – RPO4.2	RPO 4.2: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.	✓ There is sufficient existing and planned social and physical infrastructure to ensure there is sufficient capacity to service the proposed residential development
Consolidation and Re-Intensification	RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.	✓ The proposed development is on a brownfield site, providing for a higher density within the existing built up area of Dublin City in close proximity to existing and planned public transport projects
MASP Sustainable Transport	RPO 5.2: Support the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, Bus Connects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.	<ul style="list-style-type: none"> ✓ The proposed site has been designed to maximise the efficiency, whilst also being located in close proximity to existing and planned transport network ✓ The proposed development has been planned that facilitates sustainable travel patterns, given the amount of bicycle spaces and permeability throughout the layout and linking to the wider surrounding area
	RPO 5.3: Future development in the Dublin Metropolitan area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.	
MASP Housing and Regeneration	RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’ ¹ , ‘Sustainable Urban Housing; Design Standards for New Apartments’ ² Guidelines ² , and Draft ‘Urban Development	✓ The proposed development’s densities and qualitative standards are in accordance with these guidelines. Please refer to section 5 of this report for further analysis / details

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	and Building Heights Guidelines for Planning Authorities'	
	RPO 5.5: Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the draft RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns	✓ The site is of the highest (sequential) priority, being a vacant, brownfield site within Dublin City, which has already been selected by DCC for residential development through Variation No. 5 of the DCCDP
Sustainable Growth	RPO 6.2: Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.	✓ The land proposed for residential development in this planning application is zoned for residential development. The principle of the acceptability of residential development of this land has already been accepted by DCC, with the outstanding matter regarding the proposed building height addressed in the Material Contravention Statement
Air Quality	RPO 7.7: To reduce harmful emissions and achieve and maintain good air quality for all urban and rural areas in the Region and to work with Local Authorities and the relevant agencies to support local data collection in the development of air quality monitoring and to inform a regional air quality and greenhouse gas emissions inventory.	<ul style="list-style-type: none"> ✓ An air quality impact assessment has been undertaken for a proposed mixed-use development, Chivers Site, Coolock, Dublin. ✓ Taking into consideration the original risk assessment of the proposed construction works and further to mitigation being enacted, the Air Quality concludes that no significant impacts will result as a consequence of the proposed development
Noise Pollution	RPO 7.8: Local Authorities shall incorporate the objectives of the EU Environmental Noise Directive in the preparation of strategic noise maps and action plans that support proactive measures to avoid, mitigate, and minimise noise, in cases where it is likely to have harmful effects.	✓ A noise impact assessment has been undertaken for the proposed mixed-use development. Construction noise impacts were assessed against BS5228:2014 noise limits and noted to be compliant at all existing residential properties. There will therefore be no residual construction impacts from the proposed development.
Light Pollution	RPO 7.9: Local Authorities shall consider measures to minimise the harmful effects of light pollution in the future provision of outdoor lighting, including improving their approach to street lighting and ensuring	✓ This planning application is accompanied by a Lighting Statement and supporting drawings which have been

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	that new developments are lit appropriately and to ensure that environmentally sensitive areas are protected.	prepared by Metec Consulting Engineers.
Flooding	RPO 7.12: Future statutory landuse plans shall include Strategic Flood Risk Assessment (SFRA) and seek to avoid inappropriate land use zonings and development in areas at risk of flooding and to integrate sustainable water management solutions (such as SUDS, nonporous surfacing and green roofs) to create safe places in accordance with the Planning System and Flood Risk Assessment Guidelines for Local Authorities	✓ The flood risk assessment that accompanies this planning application demonstrates that the proposed development is acceptable in flood risk terms.
Integration of Transport and Land Use Planning	RPO 8.3: That future development is planned and designed in a manner which maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned and to protect and maintain regional accessibility.	✓ At a density of 137 dwellings per hectare, the development as proposed is an efficient use of the site.
Housing	RPO 9.4: Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.	✓ The proposed apartments adhere to national apartment standards, as well as being designed to accommodate a mix demographic profile
Compact Urban Development	RPO 9.9: Local Authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and at least 30% of all new homes within or contiguous to the built-up area of metropolitan settlements within the wider Dublin metropolitan area.	✓ The proposed development achieves compact urban as it is a brownfield site in the Dublin city urban area
Childcare, education and life long learning	RPO 9.16: In areas where significant new housing is proposed, an assessment of need regarding schools provision should be carried out and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations.	✓ An assessment of the school and creche provision has been undertaken. It concludes that there is sufficient existing and planned school provision, whilst the proposal includes a creche to meet the projected needs of the proposed residential development
Water Supply – RPO10.1	RPO 10.1: Local Authorities shall include proposals in Development Plans to ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.	✓ The proposed new water supply will be taken from the public network on Coolock Drive where it will be directed around the site in accordance with Irish Water Codes of Practice
Waste Water Treatment – RPO 10.5	RPO 10.5: Support Irish Water and the relevant Local Authorities in the Region to eliminate untreated discharges from settlements in the short term, while planning strategically for long term growth in tandem with Project Ireland 2040 and in increasing compliance with the requirements of the Urban Waste Water	✓ It is proposed to divert the 450mm diameter public sewer locally such that the sewer is located under a main access road In the site and the necessary wayleaves are provided. All drainage works

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	Treatment Directive from 39% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040;	shall comply with Irish Water Standards ✓ A new connection to the public system be made to the diverted 450mm diameter trunk sewer as shown on Cora Drawing 1753/C001 and 1753/C003.
Surface Water – RPO 10.10	RPO 10.10: Support the relevant Local Authorities (and Irish Water where relevant) in the Region to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment and in the development and provision at a local level of Sustainable Urban Drainage solutions	✓ A fully separated Surface Water Drainage System is proposed to retain storm water within the site with minimal run off via terraced swales forming a new wetland landscaping feature at the south bank of the Santry River. This strategy would reduce the run off from the site to the public system as a sustainable system shall be implemented on site for the first time.
Surface Water – RPO 10.11	RPO 10.11: Implement policies contained in the Greater Dublin Strategic Drainage Study (GSDSDS), including SuDS.	✓ Details of the surface water strategy are shown on Cora Drawing 1753/C001, 1753/C002 and 1753/C004.
Surface Water – RPO 10.12	RPO 10.12: Implement the specific recommendations of the GSDSDS in relation to Climate Change Regional Drainage Policies for all relevant developments within the Region.	✓ The Architectural Design Statement includes the refuse strategy proposed as part of the planning. ✓ A Construction Environment Management Plan is enclosed in the planning application to demonstrate how waste will be managed during the development of the site.
Waste Management – RPO 10.20	RPO 10.20: Development Plans shall identify how waste will be reduced, in line with the principles of the circular economy and how remaining quantum of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food.	

7.0 Consistency with Local Planning Policy

7.1 This section includes an assessment of the proposed development against those policies set out in the Dublin City Development Plan (DCDP) (2016-2022) with respect to the following matters:

- Overarching Principles
 - The Need for Housing;
 - Spatial Approach;
- Assessment of the Proposed Development;
 - Principle of Development;
 - Height, Scale, Density (Plot Ratio and Site Coverage), Design, Sunlight and Daylight Assessment and Wind (Micro-climate);
 - Parking Provision;
 - Trees, Landscaping and Open Space;
 - Flood Risk and Drainage;
 - Ducting and Energy;
- Assessment of the impact of the proposed development;
 - Overshadowing and residential amenity;
 - Landscape and Visual Impact Assessment;
 - Ecology;
 - Traffic;
 - Waste Management, Remediation, Noise, Air Quality and Lighting
 - Archaeology;
- Other Pertinent Matters;
 - Part V;
 - Creche;
 - Response to An Bord Pleanála Pre Application Consultation Opinion; and
 - Phasing and Structure of Decision;

Overarching Principles

The Need for Housing

7.2 Table 1 (Population and Household Size Projections) of Appendix 2A (Housing Strategy) of the DCDP states that a total of 29,517 new dwelling units are required to meet the projected changes in population and household size over the period 2016 – 2022. This equates to 4,215 units required per annum between 2016 -2022.

Statement of consistency on the Need for Housing

- ✓ The proposed development will deliver 495 homes to assist in making up the shortfall in delivery of residential development and, also assisting the Council to meet its annual housing requirement

Spatial Approach

7.3 Dublin City in its entirety lies within the metropolitan area and the RPGs give direction to Dublin City as the “gateway core” for high-intensity clusters, brownfield development, urban renewal and regeneration.

7.4 The settlement strategy for Dublin includes a strong policy emphasis on the need to gain maximum benefit from existing assets, such as public transport and social infrastructure through the continuation of consolidation and increasing densities within the existing built footprint of the city.

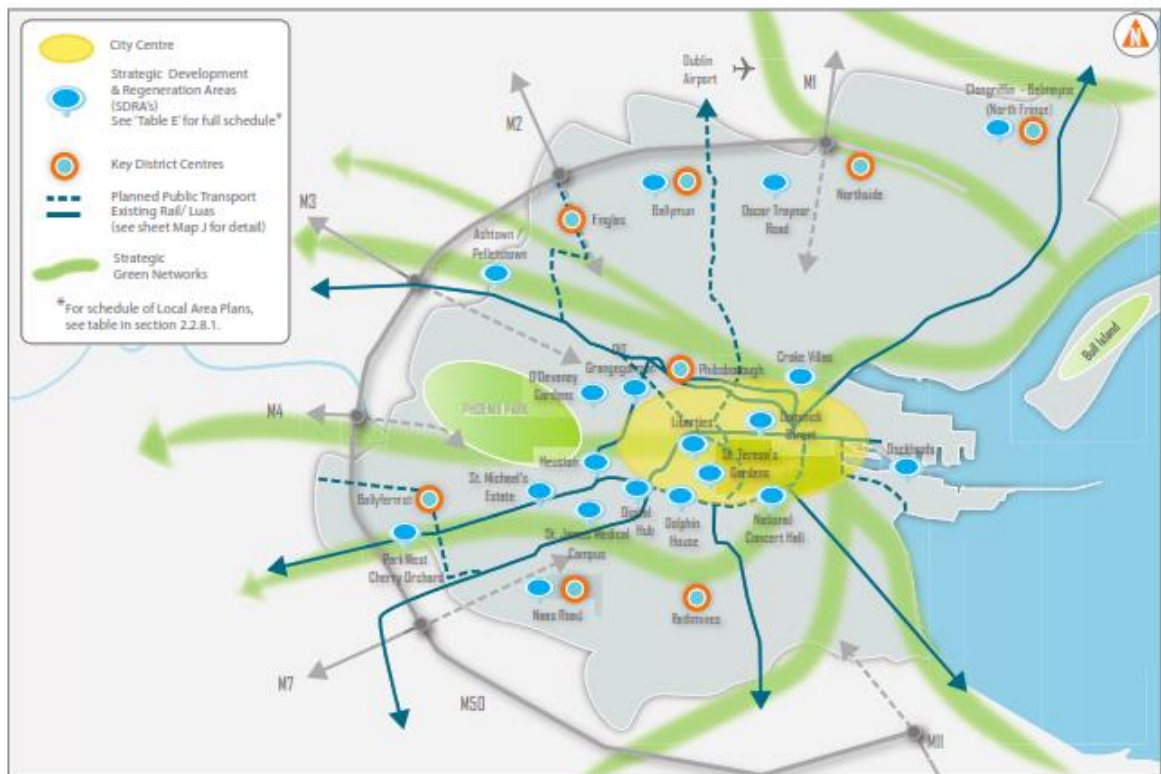


Figure 7.1 – Core Strategy

7.5 Section 4.5.3 (Making a more Compact Sustainable City) sets out that the physical consolidation of Dublin, supported by effective land use policies is an essential requirement for a competitive Dublin, and consolidation is also required for the public transport system to function effectively.

Statement of consistency with the Spatial Approach

✓ The delivery of homes on this brownfield site, to an effective density of 137 dwellings per hectare will meet the aims of delivering a more compact city

Assessment of Proposed Development

Principle of Development

Z1 Lands

7.6 The Council formally varied the zoning of the lands proposed for residential development under Variation (No.5) of the Dublin City Development Plan 2016 – 2002:

- From Zoning Objective Z6 – To provide for the creation and protection of enterprise and facilitate opportunities for employment creation.
- To Zoning Objective Z1 – To protect, provide and improve residential amenities.

7.7 The variation area is outlined in red in Figure 7.2.

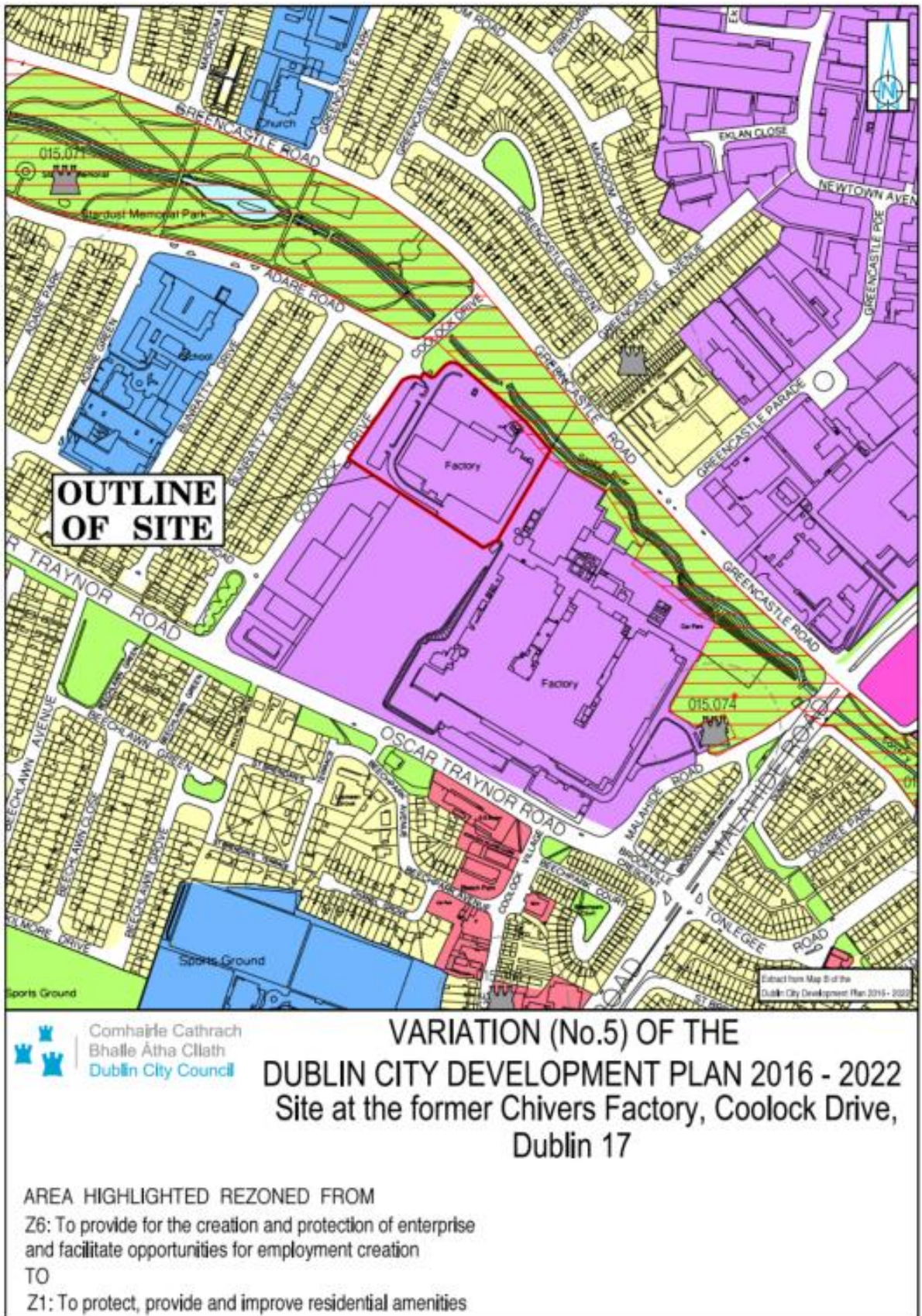


Figure 7.2 – Variation (No.5) of the Dublin City Development Plan (2016-2022).

7.8 The Council agreed with the proposed variation that it was appropriate to change the zoning of the subject lands from Z6 (Employment / Enterprise) to Z1 (Sustainable Residential Neighbourhoods). The full reasons for the variation of this part of the site is shown in Appendix 3 of this report.

7.9 Therefore, the principle of residential development on the zoned Z1 lands is acceptable, subject to the consideration and acceptability of the site-specific matters, which are addressed later in this report, with further details contained in the accompanying documents submitted with this planning application.

Z9 lands

7.10 The remaining lands within site (excluding the Council's highway land) comprises Z9 (Amenity / Open Space Lands / Green Network). The Conservation Area boundary (shown by the red hatching) overlays the Z9 lands, and a small proportion of the Z1 zoned lands, which are considered in more detail within the assessment of the design and landscaping of the proposal later in this report.

7.11 Section 14.8.9 of the DCC DP states that of Land-Use Zoning Objective Z9 seeks to:

"To preserve, provide and improve recreational amenity and open space and green networks"

7.12 Section 14.8.9 also states that the provision of public open space is essential to the development of a strategic green network. In certain specific circumstances where it has been demonstrated to the satisfaction of the planning authority that there is a need for ancillary development to take place to consolidate or retain the sporting and amenity nature of Z9 lands, or an existing facility in a local area, some limited degree of (residential / retail) development may be permitted on a once-off basis and subject to the primary use of the site being retained for sporting or amenity uses.

7.13 Section 14.4 of the DCC DP refers to permissible and non-permissible uses, which are defined as follows:

- A **permissible use** is one which is generally acceptable in principle in the relevant zone, but which is subject to normal planning consideration, including policies and objectives outlined in the plan.
- An **open for consideration use** is one which may be permitted where the planning authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects on the permitted uses, and would otherwise be consistent with the proposed planning and sustainable development of the area.

7.14 Zoning Objective Z9 states the following in respect of "permissible uses" and "open for consideration uses".

- Permissible Uses: Cemetery, club house and associated facilities, municipal golf course, open space (see Appendix 21 land use definitions), public service installation which would not be detrimental to the amenity of Z9 zoned lands.
- Open for Consideration Use: Car park for recreational purposes, caravan park / camp site (holiday), community facility, craft centre / craft shop, creche, cultural / recreational building and uses, golf course and clubhouse, kiosk, neighbourhood retail (in accordance with highly exceptional circumstances above), tea room, café / restaurant.

7.15 Appendix 21 of the DCC DP states that open space is defined as:

Any land, including water, (active or passive use) whether enclosed or not, on which there are no buildings, (or not more than 5 per cent is covered with buildings), and the remainder of which is laid out as a garden/community garden or for the purposes of recreation, or lies vacant, waste or

unoccupied. It also includes school playing fields, playgrounds, urban farms, forests, allotments and outdoor civic spaces, passive play areas and outdoor exercise facilities.

Permissible uses proposed

- 7.16 Within the Z9 lands a total of 15660 square metres of public open space is proposed in this area, the use of which are permissible in principle.

Open for consideration uses proposed

- 7.17 A creche, café and recreational use are identified as those that are *open for consideration* within the DCC DP, and that they would be acceptable, subject to the following criteria that the use(s):

- *Are compatible with the overall policies and objectives for the zone;*
- *Would not have undesirable effects on the permitted uses; and*
- *Would otherwise be consistent with the proposed planning and sustainable development of the area.*

Compatible with the overall policies and objectives for the zone

- 7.18 For the purposes of this assessment, the need for a creche is considered later in this section. At this stage, the matter of the principle of the acceptability of the proposed use is only considered.

- 7.19 In this case, it is submitted that the three proposed uses (creche, café and gym (recreational use)) within the service building meet the wider objectives of the development plan, by providing the necessary support services for the proposed development.

- 7.20 In accordance with Section 14.8.9 (Amenity/ Open Space Lands / Green Network – Zone Z9). of the DCC DP, the legal covenant submitted by the applicant with the planning application also includes reference to the gym, which demonstrates how it will be retained long term on site.

Would not have undesirable effects on the permitted uses

- 7.21 The Z9 lands cover c. 1.08 hectares of the 3.61ha site area of the former Coolock Factory site. At present this land is currently fenced off and cannot be accessed by the public. This land also includes an existing gatehouse building that is proposed to be demolished as part of this planning application.

- 7.22 In the case of the Z9 lands, Appendix 21 has been interpreted as meaning that no more than 5% (540 square metres) of the 1.08 hectares should be covered by buildings. The service building's site coverage (i.e. the building that covers the Z9 lands) measures c. 485 square metres at the ground floor, which represents c. 4.5% of the Z9 land.

- 7.23 Therefore, the proposed building falls below the 5% threshold it is submitted that this would not have an undesirable effect on the permitted use (i.e. open space) in the Z9 lands.

Would otherwise be consistent with the proposed planning and sustainable development of the area

- 7.24 The service building is integrated as part of the overall development and is strategically located to be accessible by the existing residents or the wider Coolock area, as well as future residents in the Build to Rent apartments.

Statement of consistency on Principle of Development / Zoning

- ✓ This planning application is proposing 495 build to rent residential units entirely on the residential (Z1) zoned lands,
- ✓ The proposed uses on the Z9 lands are either permitted in principle, or it has been demonstrated that the uses proposed within the service building are acceptable, following the consideration of the criteria above;
- ✓ The remainder of this section demonstrates how the proposed development is consistent with the detailed matters as set out in the development plan, and collectively this demonstrates that the proposed development is consistent with the principle of development / zoning on this site.

Height, Scale, Density (Plot Ratio and Site Coverage), Design / Materials, Sunlight, Daylight and Overshadowing and Wind (Micro-Climate)

- 7.25 Matters associated between height, scale, density, design and sunlight, daylight and wind (micro-climate) are intrinsically linked and have therefore been considered together
- 7.26 We note that the development management criteria set out in Chapter 3 of the Building Heights Guidelines dovetail City Council's assessment criteria.
- 7.27 In the case of taller buildings, these are defined as buildings over 50m in 4.5.4.1, whilst mid-rise buildings are defined as up to 50m. The DCDP states that there are a few areas where there are good transport links and sites of sufficient size to create their own character where mid-rise buildings will help provide a new urban identity. The Council identifies those areas which are subject of a local area plan, strategic development zone or within a designated SDRA.
- 7.28 The application site does not fall within any of the above criteria and lies within the "outer city" area. The following instead is applicable in this case:

Category	Area	Height (m)
Low-rise (relates to the prevailing local height and context)	Outer City	Up to 16m (commercial and residential)

- 7.29 Section 16.7.2 (Height Limits and Areas for Low-Rise, Mid Rise and Taller Development) states that in the case of height, the definition is based on an average storey height of 3.0m for residential development, whilst ground floors should be commercial height for design, use and adaptability reasons in all areas.
- 7.30 Where required, the scale of plant at roof level should be minimised and have a suitable finish or screening so that it is discreet and unobtrusive. Plant, flues and lift overruns should not be included in the height of the building if they are set back and properly screened and do not significantly add to the shadowing or otherwise of natural light beyond that of the main structure.
- 7.31 Section 16.7.2 states that all proposals for mid-rise and taller buildings must have regard to the assessment criteria for high buildings. The matter relating to the material contravention (i.e. justification why the proposal exceeds 16m in height) is put forward in the material contravention statement.

Design / Materials

- 7.32 The Architectural Design Statement states that the intention of the masterplan is to develop a robust framework for the integrated and planned redevelopment of the site, which is currently a vacant brownfield site.

- 7.33 The masterplan has been “Design-Led”, which seeks to determine an appropriate organisation of generous new streets, parks, dwellings and community uses. The site has not been viewed in isolation, and a notional masterplan study for the adjoining lands (highlighted in yellow in Figures 21 to 26 inclusive of the Architectural Design Statement) has been prepared to allow the generation of block forms and urban design solutions which are readily translatable to a larger scale, if those lands were proposed to be brought forward for development in the future.
- 7.34 The Architectural Design Statement sets out the masterplan strategies for the site including:
- Site Zoning
 - Site Phasing
 - Block Planning
 - Pedestrian Access
 - Vehicular Access
- 7.35 Section’s 6 and 7 of the Architectural Design Statement is a response to An Bord Pleanála’s Inspectors Report Pre-Application Consultation Opinion (dated 5th December 2018), which are summarised as follows:
- Matter 1: Height, Scale and Density: The Architectural Design Statement responds directly to the 12 criteria set out in the Urban Design Manual.
 - Matter 2: Design and Layout
 - Matter 3: Residential Support Facilities and Resident Services and Amenities
- 7.36 The Architectural Design Statement concludes that the Chiver’s site is an opportunity to create a vibrant, integrated and rich urban environment. The proposed development introduces a greater height than currently permitted under the DCC DP, which is justified in the Material Contravention Statement.
- 7.37 The location of the linear park to the north of the site and the setbacks it provides to other dwellings in the area allows for greater height without any impact on residential amenity. The design of the scheme is based on seeking to create a sense of identity and address, in particular along this northern boundary.
- 7.38 The report also states that it is important that these buildings be visually strong and of sufficient scale to create a sense of place within the wider suburban context of Coolock. Therefore, the proposal is designed around creating pedestrian-friendly urban environments both between and within the various blocks. The proposal also seeks to knit itself into the existing context but also to anticipate future development on adjacent sites, which it is considered that it does.
- 7.39 The design and materials proposed are robust and appropriate to the context of Dublin. Brick cladding is used throughout with significant textured brick detailing provided to create visual interest but also to help articulate various elements within the facades.
- 7.40 This brick cladding is counterpointed by a visually contrasting white stone cladding at corner buildings and higher elements. The architectural treatment of these elements is designed to create identity and a sense of place within the overall scheme.
- 7.41 As a Build-to-Rent residential scheme our proposal will provide a diverse range of apartments both in terms of layout and size. This in turn will allow for a wide variety of occupants from single people and couples up to larger families.

Density (Plot Ratio Site Coverage)

- 7.42 Section 4.5.3 of the DCDP advises that higher densities will be promoted within the city centre, within KDCs, SDRAs and within the catchment of high capacity public transport. The density standards set out in the plan will promote the development of high quality, sustainable densities and the consolidation of urban form.
- 7.43 Section 16.5 of the DCC DP states that the indicative plot ratio standards for Z1 and Z2 sites in the outer city is 0.5-2.0. A higher plot ratio may be permitted in certain circumstances, such as:
- Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed
 - To facilitate comprehensive redevelopment in areas in need of urban renewal
 - To maintain existing streetscape profiles
 - Where a site has already has the benefit of a higher plot ratio
 - To facilitate the strategic role of institutions such as hospitals
- 7.44 In the case of this development for the Chivers Factory Site (i.e. the 3.61 hectares), the plot ratio is 1.8, which is within the indicative standards within the DCDP.
- 7.45 Site coverage is a control for the purpose of preventing the adverse effects of over development, thereby safeguarding sunlight and daylight within or adjoining a proposed layout of buildings.
- 7.46 A higher site coverage may be permitted in certain circumstances, such as:
- Adjoining major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed
 - To facilitate comprehensive redevelopment in areas in need of urban renewal
 - To maintain existing streetscape profiles
 - Where a site has already has the benefit of a higher plot ratio
- 7.47 In the case of lands zoned Z1, the indicative site coverage is 45% - 60%. The site coverage for the Chivers Factory Site (i.e. the 3.61 hectares) is 42% which is considered appropriate for the site, when taking into consideration other detailed factors, including daylight, sunlight and overshadowing, as set out below and within the report.

Daylight and Sunlight Assessment

- 7.48 The Daylight, Sunlight and Overshadowing Assessment report of the proposed development was prepared by Metec Consulting Engineers. For the purposes of this assessment, the matter of overshadowing is addressed in the consideration of the impact of the proposed development on the surrounding area later in this section.
- 7.49 The daylight assessment of the proposed development comprised of the apartments that would be considered “worst case” in terms of receiving obstructions to daylight i.e. the lower floors. The results confirmed that very good levels of daylight would be achieved by the apartments as 97% of the assessed rooms met or exceeded the recommended daylight targets. Amenity spaces (garden and open spaces) all exceed the BRE Guide metrics for sunlight, while the elevations / facades of proposed development were also shown to receive very good levels of Sunlight.
- 7.50 Close collaboration among the design team from the conceptual design stage enabled the potential impacts in relation to Daylight, Sunlight and Overshadowing (confirmed later in this report) to be

minimised, as well as ensuring that the proposed development would achieve the guidelines in relation to daylight and sunlight.

Wind (Micro Climate)

- 7.51 The Wind Microclimate Assessment of the proposed development was prepared by Metec Consulting Engineers. This study uses the Lawson Pedestrian Comfort criteria to assess the wind microclimate at pedestrian level for the proposed Chivers site redevelopment.
- 7.52 The geometry of the surroundings and terrain were built from aerial photographs taken in 2018 using photogrammetry techniques to digitise points that define the geometry over which a surface mesh was generated.
- 7.53 The report states that in terms of pedestrian comfort, in all areas of the site in summer and is assessed as suitable for 'Strolling' or better in all regions. In winter, pedestrian areas in-between Block B and Block C, in-between Block A1 and Block A2, and areas at the west corner of the Gym, Creche, and Café building (along Coolock Drive) are assessed as suitable for 'Business Walking'.
- 7.54 Some small areas of the proposed Chivers Site redevelopment are uncomfortable for pedestrians in the worst-case winter season, however, with the introduction of the proposed landscape masterplan, it is expected all pedestrian spaces outlined above will have improved comfort levels and to be suitable for their purpose of use.
- 7.55 In terms of balcony comfort all of the balconies are rated between 'Long-term sitting' and 'Strolling'. In winter, the majority of the balconies are rated between 'Long-term sitting' and 'Strolling' but at the corners of the blocks they tend to be rated as 'Business walking'. Further details are outlined in Table 7.1
- 7.56 To demonstrate the consistency of the proposed development with the objectives set out in Section 16.7.2 of the DCC DP, a response to each individual matter is outlined in Table 7.1.

Statement of Consistency for the proposed building when considered against the DCDP Criteria for Mid-Rise and Taller Buildings	
Assessment Criteria	Response
Relationship to context, including topography, built form, and skyline having regard to the need to protect important views, landmarks, prospects and vistas	<ul style="list-style-type: none"> ✓ The immediate vicinity of the site is predominantly residential, however there are retail and industrial uses to the south and east respectively. ✓ The primary response to context is that the proposal to address the linear park with an active frontage of signature blocks, creating a sense of address. ✓ Given the separation distances from existing residential areas along Greencastle Road, it was considered to be appropriate to provide significant height along the northern part of the site to provide a sense of address and enclosure at this point. ✓ The current City Development Plan, draft RSES, NPF and recent policy guidelines on apartments and heights all endorse that site's vacant brownfield sites in sustainable location (such as the former Chivers Factory site) be fully utilised to ensure maximum efficiencies of brownfield land in the city. ✓ Additionally, the accompanying Masterplan, Architectural Design Statement together with the Landscape and Visual Assessment demonstrate that the proposed development will not adversely impact on the skyline or any important view or vista.
Effect on the historic environment at a city-wide and local level	<ul style="list-style-type: none"> ✓ The cultural heritage chapter of the EIAR concludes that there will be no impact on any recorded archaeological monuments. ✓ Internally there are no Protected Structures or NIAH sites or adjacent to the site. ✓ A cut stone single arch bridge crosses the Santry River to the north of the site. ✓ There will be no direct impacts on the bridge. A balustrade may be added to the bridge. ✓ There remains a low potential that groundworks for the new development may impact on previously unrecorded archaeological material.
Relationship to transport infrastructure, particularly public transport provision	<ul style="list-style-type: none"> ✓ The site is highly accessible by public transport, including proximity to the following service provision: <ul style="list-style-type: none"> ○ Walking and Cycling, an existing cycle lane and footpath is located on both sides of Coolock way as well as all other roads surrounding the proposed development, providing connectivity from the site to surrounding public transport and employment locations; ○ Dublin Bus stops on Coolock Drive north and southbound are located within 100m of the site entrance. These stops provide a high frequency bus service to Dublin City Centre and further afield; ○ Harmanston DART station is within 1.9km from the site, where services are available to Greystones and Bray; ○ The NTA's proposed Santry River Greenway will improve connectivity of the proposed site, by enhancing existing cycle infrastructure; and ○ The NTA's proposed Bus Connects stops on Malahide Road will help facilitate additional demand for public transport in the local vicinity of the site.
Architectural excellence of a building, which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for	<ul style="list-style-type: none"> ✓ The architecture and landscape design of the scheme are of a high quality. Given the scheme is built to rent a long-term view with regard to materials and finishes has been taken, with careful selection of materials to ensure their long-term durability. ✓ The taller blocks of Block A1 and A2 are articulated with strong design components which emphasise the slenderness of the taller storeys. By employing the use of white stone, which visually contrasts to the brick of the lower stories, results in generating a sophisticated and slender expression of height.
Contribution to public spaces and facilities,	<ul style="list-style-type: none"> ✓ The proposed development incorporates a total of 28,503 square metres of open space is proposed, which is broken down between public, semi private (communal) for use by residents only and private open space, as set out in Table 4.4 of this document and shown in MA Drawings LCH002-100, LCH002-101, LCH002-102

Statement of Consistency for the proposed building when considered against the DCDP Criteria for Mid-Rise and Taller Buildings	
Assessment Criteria	Response
including the mix of uses	
Effect on the local environment, including micro-climate and general amenity considerations	<ul style="list-style-type: none"> ✓ A detailed wind analysis has been prepared by Metec and accompanies this submission under separate cover. Where potential for adverse wind conditions was identified, mitigation in the form of design and landscaping measures are incorporated to minimise and limit any potential adverse impact.
Contribution to permeability and legibility of the site and wider area	<ul style="list-style-type: none"> ✓ A total of 4no. access points are proposed to link the site with the surrounding area, to maximise permeability within the site and the wider area. A further potential point of access is provided to the east which links to the adjoining lands, if that is brought forward for development at some point in the future.
Sufficient accompanying material to enable a proper assessment, including urban design study / masterplan, a 360 degree view analysis, shadow impact assessment, wind impact analysis, details of signage, branding and lighting, and relative height studies	<ul style="list-style-type: none"> ✓ This submission is accompanied by a Masterplan and an Architectural Design Statement that comprehensively set out the information to allow An Bord Pleanála to undertake an assessment of the scheme. <p>Sunlight / Daylight / Overshadowing</p> <ul style="list-style-type: none"> ✓ A Sunlight, Daylight and Overshadowing Assessment has been prepared by Metec. ✓ In terms of Daylight, 97% of the 580 rooms assessed in the 202 apartments analysed achieve the BRE Guidelines ✓ This assessment primarily focused on apartments that would be considered “worst case” in terms of receiving obstructions to daylight (i.e. the lower floors). If all apartments were analysed, i.e. with the inclusion of more of the upper floors, the percentage pass rate would increase further because the Average Daylight Factor of the upper floors are even less obstructed ✓ In those apartments that do not fully meet this criteria, the following compensatory measures are proposed: <ul style="list-style-type: none"> ○ Units have an apartment floor area that is ≥10% larger than the design standards for new apartments; ○ A high proportion of glazing is provided to all units. Specification of glazing with a high glazing transmittance value to ensure maximum light penetration into apartments ○ Balcony space exceeds the design standards referenced in the March 2018 apartment guidelines; and ○ 27% of the units noted as being short of the target daylight values are dual aspect. ✓ Sunlight (Amenity Spaces – Gardens & Open Spaces) <ul style="list-style-type: none"> ○ Sunlight in amenity spaces is achieved for this proposed development, as all central courtyards exceed the recommended sunlight levels ✓ Solar Shading of existing adjacent properties <ul style="list-style-type: none"> ○ Whilst additional shade was identified (please refer to the Sunlight, Daylight and Overshadowing Assessment) the results of the VSC and sunlight simulation have demonstrated that the guidelines for maintaining light received by existing buildings with the proposed development in place have been achieved ✓ Potential adjoining development land <ul style="list-style-type: none"> ○ The BRE recommended criteria for safeguarding the diffuse daylighting potential of the neighbouring lands is achieved.

Statement of Consistency for the proposed building when considered against the DCDP Criteria for Mid-Rise and Taller Buildings	
Assessment Criteria	Response
	<p>Wind (Micro Climate)</p> <ul style="list-style-type: none"> ✓ The micro-climatic assessment demonstrates that <ul style="list-style-type: none"> • Pedestrian comfort is achieved in all areas of the site in summer; • In winter, the site is subject to higher and more frequent winds from the southwest which means pedestrian areas in-between Block B and Block C, in-between Block A1 and Block A2, and areas at the west corner of the service building have higher than desirable wind speeds; • A limited number of areas of the site were identified as being uncomfortable for pedestrians in the worst-case winter season. These were identified to be south of the pedestrian spaces in-between Block B and Block C, and the southern corner of Block C; • No areas of the site exceed the Lawson distress threshold for able-bodied pedestrians; • There are areas that receive less frequent winds that exceed the 15m/s distress threshold for vulnerable pedestrians: <ul style="list-style-type: none"> ○ South of the pedestrian areas in-between Block B and Block C; ○ The pedestrian areas in-between Block A1 and Block A2; ○ West corner of the service building; and ○ Small areas at the southernmost corner of the site. • The distress threshold wind speed of 15m/s for vulnerable pedestrians was found to occur for no more than 5 hours annually in the worst case area i.e. South area in-between Block B and Block C. <p>However, with the introduction of the proposed landscape masterplan, it is expected all pedestrian spaces outlined above to be safe for their purpose of use.</p>
Adoption of best practice guidance related to the sustainable design and construction of tall buildings	<ul style="list-style-type: none"> ✓ The design intent will be to play close attention to the requirements of the EPBD (Energy Performance Building Directive) and the Building Regulations Technical Guidance Document Part L, which are the current drivers for sustainable building design in Ireland ✓ The intent for the buildings' services (mechanical and electrical) design strategy is to utilise as many sustainable design options and energy efficient features that are technically, environmentally and economically feasible for the project in an aim to achieve a development that is low energy and environmentally friendly ✓ The apartments are generous in size, allowing flexibility for the changing needs of residents overtime.
Evaluation of providing a similar level of density in an alternative urban form.	<ul style="list-style-type: none"> ✓ Similar density in an alternate form would result in blanket coverage of the site. ✓ The proposed scheme provides density while also retaining amenities for residents. ✓ The layout of the project is designed around creating a permeable network of direct routes, where pedestrian, cycle and vehicular facilities are integrated. ✓ The mix of low- and high-rise buildings responds to the local context and the site constraints.

Table 7.1 – Statement of Consistency for the proposed buildings when considered against the DCDP criteria for mid-rise and taller buildings

Parking Provision

- 7.57 The DCDP includes three zones (1,2 and 3) for which to assess car parking standards. Figure 7.3 is an extract from Map J (Strategic Transport and Parking Areas) of the DCDP, which shows that the site falls within zone 3.

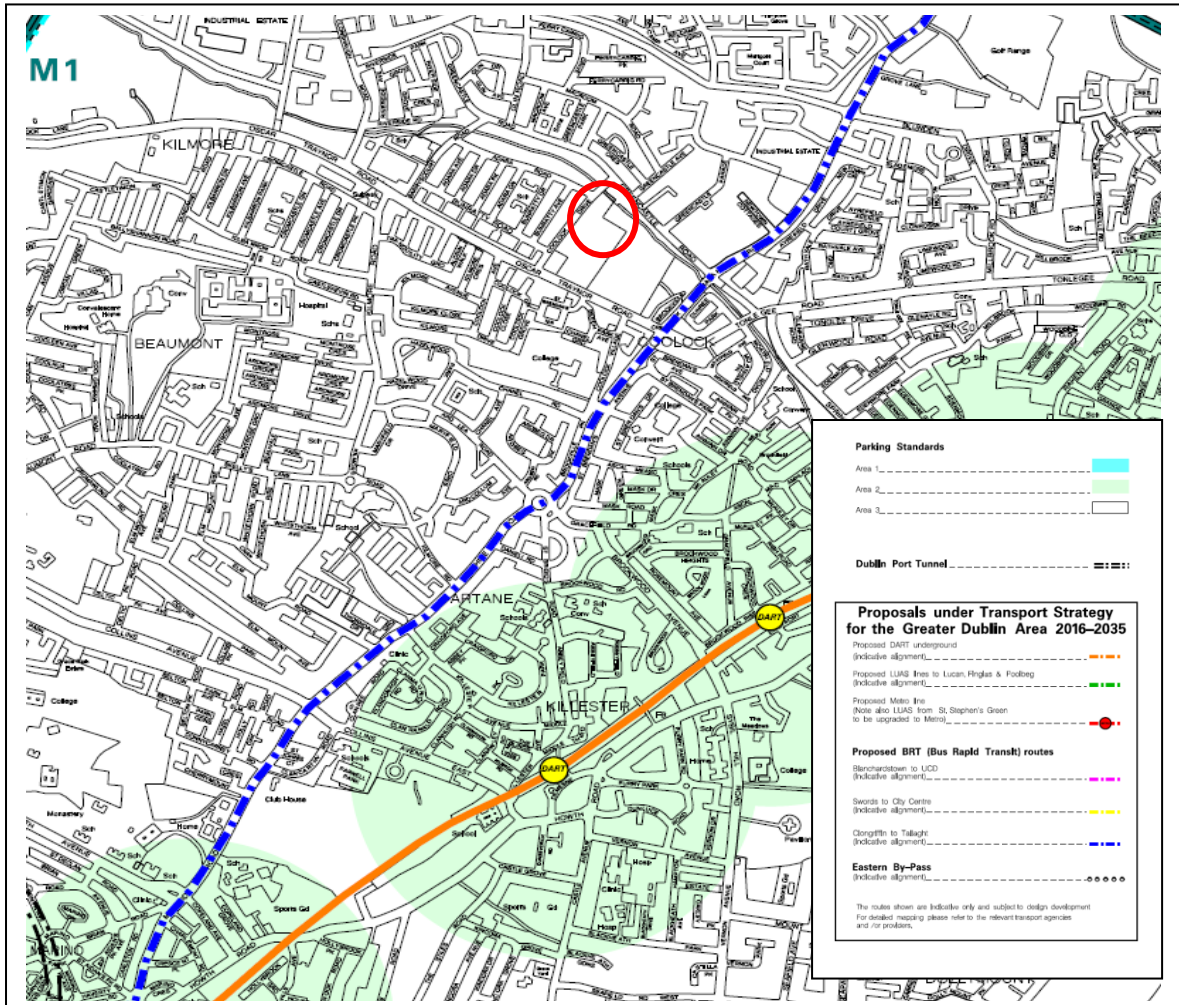


Figure 7.3 – Site Location in context of car parking areas

- 7.58 Table 16.1 (Maximum Car Parking Standards for Various Land-Uses) of the DCDP states that the maximum number of spaces is 1.5 spaces per dwelling within area 3. Where a deviation from the maximum standards is to be considered, the acceptability of proposals will be assessed against a number of criteria (which are considered in the forthcoming paragraphs).
- 7.59 The TTA has informed the overall quantum of development proposed within the development, where a total of 396 car parking spaces are proposed to serve the development. In the case of the residential aspect, 391 spaces (which include 23 disabled spaces) are proposed, which is a ratio of 0.79 spaces per apartment. This represents a significant reduction on that set out in the DCC DP, with the details having been agreed by the Planning Authority. The quantum of bicycle parking (650no.) and motorbike parking (16no.) spaces have also been agreed by the planning authority.
- 7.60 Therefore, the proposed parking is within the maximum number of spaces, and therefore in this case are appropriate and do not deviate from the DCC DP.

Statement of Consistency on parking

- ✓ The site is located within area 3, where a maximum number of space is 1.5 spaces per dwelling. Under the Apartment Guidelines (2018), the site is defined as being located in area 2 (“intermediate urban location”), the justification of which is set out in section 5 of this report.
- ✓ It has been agreed with Dublin City Council, that 0.79 spaces per unit is acceptable to the Council, which is, in turn supported by national policy within the apartment guidelines which seeks to significantly reduce parking provision in such locations.
- ✓ In addition, the parking provision is a maximum of 1.5 spaces per unit, and this proposal falls within that.
- ✓ The car parking provision is therefore consistent with the Council’s transport policy requirements.

Trees, Landscaping and Open Space

- 7.61 14no. are proposed to be felled, which are located on Coolock Drive to facilitate the proposed development. To mitigate the impact, a total of 269 no. trees are proposed to be provided in their place.
- 7.62 The type of Conservation Area with red hatching is referred to in 11.1.5.4 of the DCC DP, where it states that the policy mechanisms used to conserve and protect areas of special historic and architectural interest are land-use zonings Residential Conservation Areas (land-use zoning Z2) and Architectural and Civic Design Character Areas (land-use zoning Z8) and the red-hatched areas shown on the zoning objective maps.
- 7.63 The policy rationale for Conservation Areas is summarised to provide a *compact, quality, green, well-connected city, which generates a dynamic, mixed-us environment for living, working and cultural interaction.* Policy CHC4 is of relevance which includes the following pertinent matters, for enhancement opportunities including part 3 refers to improvement of open spaces and the wider public realm, whilst part 4 states that Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area.
- 7.64 A total of 28,503 square metres of open space is also proposed, which is broken down between public, semi private (communal) for use by residents only and private open space, as set out in Table 7.2, and shown in MA Drawings LCH002-100, LCH002-101, LCH002-102.

Open Space Type	Quantum (sq.m)
Public Open Space	15660
Semi Private (Communal) Open Space	
Court yards	4260
Roof Gardens	5300
Private Open Space	3283
Total	28503

Table 7.2 – Proposed Open Space

- 7.65 The Landscape Design Report and Outline Specification for Softworks prepared by MA accompanies this application and provides details of how the site is utilised in terms of open space provision, landscaping and planting. The proposed landscaping enhances the overall quality of the scheme and incorporates the proposed development within the wider area, which would deliver a linked community.

- 7.66 In this case it is considered that the impact of the loss of the existing trees is satisfactorily mitigated by the proposed development, and provides an opportunity for lands to be provided for the public realm, and providing permeability throughout the site and linking to the wider area
- 7.67 Section 10 (Green Infrastructure, Open Space & Recreation) of the DCC DP includes those policies and objectives, with Table 7.3 providing a direct statement of consistency response to those relevant policies and objectives on these matters.

Policy / Objective	Statement of Consistency
<p>Objective CHC4 - To protect the special interest and character of all Dublin's Conservation Areas. Development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.</p> <p>Enhancement opportunities may include:</p> <p>3. Improvement of open spaces and the wider public realm, and re-instatement of historic routes and characteristic plot patterns</p> <p>Development will not:</p> <ol style="list-style-type: none"> 1. Harm buildings, spaces, original street patterns or other features which contribute positively to the special interest of the Conservation Area 2. Involve the loss of traditional, historic or important building forms, features, and detailing including roof-scapes, shop-fronts, doors, windows and other decorative detail 3. Introduce design details and materials, such as uPVC, aluminium and inappropriately designed or dimensioned timber windows and doors 4. Harm the setting of a Conservation Area 5. Constitute a visually obtrusive or dominant form. 	<p>Enhancement</p> <ul style="list-style-type: none"> ✓ The proposed development includes a range of open spaces, with public open spaces provision focused around the northern part of the site, which includes a range of access and inter-connecting routes ✓ It therefore represents an improvement of open spaces and provision of the wider public realm <p>Development</p> <ul style="list-style-type: none"> ✓ Part 1 - The existing bridge crossing the Santry River is proposed to be retained, as recommended by the Cultural Heritage chapter in the EIAR ✓ Part 2 – Not applicable ✓ Part 3 – The proposed design is of high quality design, with the use of appropriate design details and materials, as demonstrated in the Architectural Design Statement prepared by Plus Architecture ✓ Part 4 <ul style="list-style-type: none"> ○ The scheme allows public access to the area, extending the Santry river park, and, rather than harming the conservation area, it introduces enhancements in terms of: <ol style="list-style-type: none"> a. riparian habitat with the new areas for marginal planting beside the river, b. new tree planting and grassland management ○ Referring to the LVIA, the visual impacts noted from the river ark and environs are moderate and neutral to positive. The immediate area is not currently publicly accessible, however, the visual studies show that it is preferable to have a new active urban residential edge to the linear park extension than a derelict factory building as a backdrop. ○ The drainage scheme is based on SuDS principles, with surface water passing through at least 2 filtration treatment stages from sedum roofs and biodiversity features at ground level in the form of linear soakaways to a wetland feature on the Santry River bank. ✓ Part 5 - Based on the documents submitted the proposed development would not constitute a visually obtrusive or dominant
<p>GI 1: To develop a green infrastructure network through the city, thereby interconnecting strategic natural and semi-natural areas with other environmental features including green spaces, rivers, canals and other physical features in terrestrial (including coastal) and marine areas.</p>	

Policy / Objective	Statement of Consistency
	form of development, as it has been designed taking into consideration the context of the site and surroundings, as well as responding to national planning policy to increase density in sustainable locations within Dublin City
GI2: That any plan/project, either individually or in combination with other plans or projects that has the potential to give rise to significant effect on the integrity of any European site(s), shall be subject to an appropriate assessment in accordance with Article 6(3) and 6(4) of the EU Habitats Directives.	✓ The application is accompanied by an EIAR and NIS
GI3: To develop linear parks, particularly along waterways, and to link existing parks and open spaces in order to provide green chains throughout the city. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.	✓ The proposed development includes open spaces, and provision of a linear park to the north of the site. This linear park would be open to the public and actively managed the same as the adjoining park land areas.
GI4: To co-ordinate open space, biodiversity and flood management requirements, in progressing a green infrastructure network.	✓ The open space provided has taken into consideration biodiversity and flood management requirements
GI5: To promote permeability through our green infrastructure for pedestrians and cyclists.	✓ The layout is permeable, and accessible within the site and providing links to the surrounding area
GI01: To integrate Green Infrastructure solutions into new developments and as part of the development of a Green Infrastructure Strategy for the city.	✓ The linear park and open space provision is integrated into the proposed development, which has also informed the design and layout of the proposal
GI02: To apply principles of Green Infrastructure development to inform the development management process in terms of design and layout of new residential areas, business/ industrial development and other significant projects.	
GI04: To improve pedestrian and cycle access routes to strategic level amenities while ensuring that ecosystem functions and existing amenity uses are not compromised and existing biodiversity and heritage is protected and enhanced.	✓ Pedestrian routes are provided within the site, and it is accessible by both pedestrian and cyclists, providing links to existing amenity uses in the area, and, where possible protecting existing biodiversity
GI7: To continue to protect and enhance landscape, including existing green spaces through sustainable planning and design for both existing community and for future generations in accordance with the principles of the European Landscape Convention.	✓ The proposed development will enhance the landscape and provide a publicly accessible linear park, which has been sensitively planned and designed for the existing and future community
GI07: To promote the city landscapes, including rivers, canals and bay, as a major resource for the city and forming core areas of green infrastructure network.	✓ The Santry River is regarded as a significant opportunity for the site, which has informed the proposed development layout, by providing design criteria agreed with the environmental consultant and Inland Fisheries Ireland. In contrast to the steep embankment that exists at present a combination of a terraced, sloped and shelved land form treatments will allow for the establishment of aquatic planting, self-seeding species and, from a health and safety perspective, allow for easy egress.
GI10: To continue to manage and protect and/ or enhance public open spaces to meet the social, recreational, conservation and ecological needs of the city and to consider the development of appropriate complementary facilities which do not detract from the amenities of spaces.	✓ The proposed development would enhance the existing public open space provision in the area, by providing publicly accessible

Policy / Objective	Statement of Consistency
GI11: To seek the provision of additional spaces in areas deficient in public open spaces – by way of pocket parks or the development of institutional lands.	open space, which would be actively managed by the applicant (i.e. being open in daytime hours)
GI12: To ensure equality of access for all citizens to the public parks and open spaces in Dublin City and to promote more open space with increased accessibility and passive surveillance where feasible. In this regard the 'Fields in Trust' benchmark for green/recreational space city wide shall be a policy goal and quality standards.	<ul style="list-style-type: none"> ✓ The proposed development includes play facilities for children, as defined on MA landscape masterplan ✓ The open space has protected, maintained and enhance the character of the watercourse, including enhancing the riparian buffer zones at the Santry River.
GI13: To ensure that in new residential developments, public open space is provided which is sufficient in quantity and distribution to meet the requirements of the projected population, including play facilities for children.	<ul style="list-style-type: none"> ✓ The open space provided protects the natural character of the Santry River.
GI14: To promote the development of soft landscaping in public open spaces, where feasible, in accordance with the principles of Sustainable Urban Drainage Systems.	
GI15: To protect, maintain, and enhance the natural and organic character of the watercourses in the city, including opening up to daylight where safe and feasible. The creation and/or enhancement of riparian buffer zones will be required where possible. It is the policy of Dublin City Council to maintain and enhance the safety of the public in its use and enjoyment of the many public parks, open spaces, waterways and linkages within the city, including the River Dodder between Ringsend and Orwell (Waldron's) bridge, and at the area known as Scully's Field between Clonskeagh and Milltown.	
GI16: To protect and improve the unique natural character and ecological value of all rivers within and forming boundaries to the administrative area of Dublin City Council, in accordance with the Eastern River Basin District management plan	
GIO18: To protect and improve the natural character of watercourses, including the Dodder, and to promote access, walkways, cycleways and other compatible recreational uses along them, having regard to environmental sensitivities.	
GI31: To improve on existing sports/ recreational facilities in the city through the implementation of the Dublin City Sport and Active Recreation Strategy 2009 – 2016 and to ensure the availability of a range of recreational facilities to the general population of all ages and groups at locations throughout the city, including ice-skating. In areas where a deficiency exists, Dublin City Council will work with the providers of such facilities, including schools, institutions and private operators, to ensure access to the local population.	<ul style="list-style-type: none"> ✓ This area is not currently open to the public and therefore would provide additional publicly accessible lands in the area. ✓ Therefore, the proposed development would enhance the existing public open space provision in the area, by providing publicly accessible open space, which would be actively managed by the applicant (i.e. being open in daytime hours).
GI32: To support the development of private recreational lands for recreational purposes.	
GI33: To seek the provision of children's play facilities in new residential developments. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.	<ul style="list-style-type: none"> ✓ The proposed development includes children's play facilities
GIO30: To support the implementation of the Dublin City Play Plan 2012 – 2017, which aims to provide inclusive and accessible play opportunities for children and young people.	

Table 7.3 – Statement of Consistency with landscaping and open space

Flood Risk and Drainage

7.68 The proposed development is accompanied by a the Water Services and Flood Risk Assessment. Section 9.5 of the DCC DP addresses matters associated with waste water and water supply. Table 7.4 provides a direct statement of consistency response to those relevant policies and objectives on these matters.

Policy / Objective	Statement of Consistency
SI1 - To support and facilitate Irish Water in the provision of high-quality drinking water, water conservation, and in the development and improvement of the water and wastewater systems to meet anticipated demands for clean and resilient water supplies and wastewater requirements for the city and region, all in accordance with the recommendations set out in the 'Greater Dublin Water Supply Strategic Study' and 'The Greater Dublin Strategic Drainage Study'.	✓ The proposed new water supply will be taken from the public network on Coolock Drive where it will be directed around the site in accordance with Irish Water codes of Practice. Please refer to the Drainage and Flood Risk Assessment for further details
SI3 - To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exists or will become available within the life of a planning permission.	✓ Irish Water has provided confirmation of design compliance (dated 15th February 2019), which is enclosed with this application
SI01 - To support Irish Water in the implementation of the 'Water Services Strategic Plan – A Plan for the Future of Water Services'.	
SI02 - To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realise the development objectives of this plan	
SI03 - To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems.	<ul style="list-style-type: none"> ✓ It is proposed that existing public foul sewer be diverted locally such that the sewer is located under a main access road in the new development and the necessary wayleaves are provided. ✓ All drainage works shall comply with Irish Water Standards. ✓ It is proposed that a new connection to the public system be made to the diverted 450mm diameter trunk sewer as shown on CORA Drawing 1753/C001 and C003.
SI04 - To minimise wastage of water supply by requiring new developments to incorporate water conservation measures, and to promote water conservation by all water users.	<ul style="list-style-type: none"> ✓ It is proposed to provide a fully separated Surface Water Drainage System and to retain Storm Water within the site with minimal run off via terraced swales forming a new wetland landscaping feature at the south bank of the Santry River. ✓ The proposed strategy dramatically reduces the runoff from the site to the public system as a sustainable system shall be implemented on site for the first time. ✓ The drainage strategy adopted would significantly improve the water quality discharging from the site such that there is indirect run-off to the Santry River. ✓ The process follows a treatment train whereby rain-water from the roofs of the buildings passes through a combination of

Policy / Objective	Statement of Consistency
	sedum roofs and soft landscaping features at the courtyard levels.
SI05- To protect existing wayleaves and buffer zones around public water service infrastructure.	✓ Wayleaves shall be provided in accordance with statutory requirements.
SI7 - To promote the progressive reduction of pollution of groundwater and prevent its further pollution.	✓ Permanent building works shall be designed to prevent contamination of ground water and any pollutants.
SI07 - To take into consideration the relevant River Basin Management Plan and Programme of Measures when considering new development proposals.	✓ The storm water drainage strategy improves water quality run-off from the site.
SI10 - To have regard to the Guidelines for Planning Authorities on the Planning System and Flood Risk Management, and Technical Appendices, November 2009, published by the Department of the Environment, Community, and Local Government as may be revised / updated when assessing planning applications and in the preparation of plans both statutory and non-statutory.	✓ A comprehensive flood risk assessment has been carried out for the site with no flood risks identified.
SI12 - To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan.	✓ The design of the buildings and civil works on the site have been considered in the flood risk assessment with no risks identified.
SI13 - That development of basements or any above-ground buildings for residential use below the estimated flood levels for Zone A or Zone B will not be permitted.	✓ The site is well elevated above the Flood Levels of all Zones.
SI15 - To minimise the risk of pluvial (intense rainfall) flooding in the city as far as is reasonably practicable and not to allow any development which would increase this risk.	✓ The Water Services and Flood Risk Assessment Report states that the current risk posed by Pluvial sources has not produced any flooding on the site and the proposals shall reduce the risk therefore the risk of flooding to the development from Pluvial Sources can be classed as 1 (Very Low).
<p>SI08 - All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> • The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government, November 2009, as may be revised/updated and the Strategic Flood Risk Assessment (SFRA) as prepared by this Development Plan. • The site-specific flood risk assessment (SSFRA) shall pay particular emphasis to residual flood risks, site-specific mitigation measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B4 of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the 	<p>✓ The Water Services and Flood Risk Assessment is submitted with this application which details the proposed drainage strategy regarding foul water drainage, water supply and surface water drainage.</p> <p>✓ The flood risk assessment considers matters associated to coastal, fluvial, pluvial, flooding from public sewers and flooding from ground water sources. In each instance it is either not applicable, or very low (1) risk.</p>

Policy / Objective	Statement of Consistency
public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. All potential sources of flood risk must be addressed in the SSFRA.	
<p>SI18 - To require the use of Sustainable Urban Drainage Systems in all new developments, where appropriate, as set out in the Greater Dublin Regional Code of Practice for Drainage Works. The following measures will apply:</p> <ul style="list-style-type: none"> • The infiltration into the ground through the development of porous pavement such as permeable paving, swales, and detention basin • The holding of water in storage areas through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands • The slow-down of the movement of water. 	<p>✓ The drainage design complies with Dublin City Councils requirements for SuDS and methods to improve the quality of stormwater run off with a minimum of a 2 stage treatment train, integrated with the site landscaping design.</p>
SIO13 - To provide additional and improved surface water networks to both reduce pollution and allow for sustainable development.	<p>✓ Storm water treatment and landscaping have been integrated to dramatically reduce storm water run of from the site and improve water quality.</p>
SIO14 - To require that any new paving of driveways or other grassed areas is carried out in a sustainable manner so that there is no increase in storm water run-off to the drainage network.	<p>✓ All new hard landscaping systems are designed as impermeable surfacing.</p>

Table 7.4 – Statement of Consistency with flood risk and drainage

Ducting and Energy

7.69 The proposed development is accompanied by a Sustainability Assessment, which has been prepared by Metec Consulting Engineers. Table 7.5 provides a direct statement of consistency response to those relevant policies and objectives on these matters.

Policy / Objective	Statement of Consistency
SIO32 - To support the installation of highspeed technologies, where practicable, in accordance with the Department of Communications, Energy and Natural Resources documents including Recommendations for Open Access Fibre Ducting and Interior Cabling for New Residential Buildings; Making Home Fibre Ready, 2011; the National Broadband Plan 2012 – Delivering a Connected Society and National Digital Strategy for Ireland 2013; Doing more with Digital – Phase 1 Digital Engagement.	<p>✓ It is proposed to extend Fibre-to-the-Home to each unit within the development to provide the development with high-speed broadband, TV and telecommunication requirements.</p>
SI31 - To support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the city, and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan, subject to relevant Irish planning and European legislation including Article 6 of the Habitats Directive and/or environmental assessment.	<p>✓ It is intended that a gas distribution network shall be extended by Gas Networks Ireland from the existing gas supply network to supply gas to the various units proposed throughout the whole development</p> <p>✓ It is the intention that the development shall be supplied from the local ESB Networks Medium Voltage Network, which includes Medium Voltage Sub-Stations on Coolock Drive (immediately adjacent to the site) and at Castle Elms on</p>
SI32 - To require that the location of local energy services such as electricity, telephone and television cables be underground wherever	

Policy / Objective	Statement of Consistency
<p>possible, and to promote the undergrounding of existing overhead cable and associated equipment, where appropriate.</p> <p>SI33 - To support the development of energy efficient initiatives such as use of District Heating and Combined Heat and Power, and to promote the use of CHP in large developments.</p>	<p>Greencastle Road. It is proposed to link to both sides of this Network for security of supply, and to locate 4 No. Substations within the development, one at each boundary</p> <ul style="list-style-type: none"> ✓ All new services proposed for the development will be located either underground or in the basement. ✓ The Development will be designed to meet nZEB requirements of Part L 2017, to include the assessment of the suitability of Combined Heat and Power

Table 7.5 – Statement of Consistency on Ducting and Energy

Assessment of the impact of the proposed development

Overshadowing and residential amenity

- 7.70 The Daylight, Sunlight and Overshadowing Assessment report of the proposed development was prepared by Metec Consulting Engineers states. that an assessment on all existing neighbouring properties has been carried out based on the BRE Guide methodology. The report confirms that the adjacent 3rd party nearby residential amenity, in terms of access to daylight and sunlight when compared with their existing baseline experience will not be compromised as a result of this proposed development.

Landscape and Visual Impact Assessment

- 7.71 The EIAR includes a landscape and visual impact assessment. A total of 19no. photomontages (shown below) were prepared, and the views chosen accurately to represent the likely visual impact from a variety of viewpoints and directions around the subject site.



Figure 7.4 Selected viewpoints (Views 1 - 19 incl.) –see 3D Design’s Book of Photomontages for full A3 scale

7.72 A summary of the impact of each view point is provided as follows:

View Point Number	Visual Effect
1	There is no visual impact.
2	There is no visual impact.
3	There is no visual impact.
4	The visual effect is significant and moderate, positive and long term.
5	The visual effect is significant and moderate, positive and long term.
6	The visual effect is significant to moderate, neutral and long term.
7	There is no visual impact.
8	The visual effect is not significant and neutral.
9	There is no visual impact.
10	The visual effect is moderate, neutral to positive and long term.
11	The visual impact is not significant and neutral
12	There is no visual impact.
13	There is no visual impact.
14	There is no visual impact.
15	There is no visual impact.
16	The visual effect is moderate, neutral and long term.
17	The visual effect is moderate, neutral and long term.
18	The visual effect is moderate, neutral and long term.
19	The visual effect is slight, neutral and long term.

Table 7.6 – Summary of LVIA

7.73 The above assessment demonstrates that of the 19no.viewpoints assessed:

- In 9no. of cases there is no visual impact;
- In 3no. cases the visual effect is significant and moderate, positive and long term;
- In 3no. cases the visual effect is moderate, neutral and long term;
- In 1no. case the visual impact is not significant and neutral

- In 1no. case the visual effect is slight, neutral and long term;
- In 1no. case the visual effect is significant to moderate, neutral and long term
- In 1no. case the visual effect is moderate, neutral to positive and long term.

7.74 The LVIA concludes that in the context of re-zoning from industrial to residential, the proposed development revitalises a derelict site. The density and height of the scheme, when seen in the context of the urban consolidation of local environs and in the context emerging baseline for sustainable housing at national policy level is nevertheless a challenge for a low-rise suburban landscape character.

7.75 However, the visual impact images range widely in the area, and demonstrate a surprising lack of visibility except when close by. The close effects are mitigated by the architectural planning, form, proportion and finishes. This visual impact is further considered in the landscape context as a positive contribution of public open space, connectivity of the Santry river corridor and permeability across the site with its associated amenities.

7.76 The degree of impact is seen as **moderate** in the context of a baseline of an inactive industrial site and a landscape character that is not particularly sensitive. The design of the scheme produces a **neutral** to positive quality in this context.

Traffic

7.77 Chapter 8 (Movement and Transport) of the DCC DP includes a range of policies and objectives relating to transport, whilst Appendix 4 specifically relates to Transport Assessments, Mobility Management and Travel Plans.

7.78 Table 7.7 provides a direct statement of consistency response to those relevant policies and objectives of the DCC DP.

Policy / Objective	Statement of Consistency
MTO1 – Encourage the intensification and mixed use development along existing and planned public transport corridors and at transport nodes where sufficient public transport capacity and accessibility exists to meet the sustainable transport requirements of the development, in order to guide future sustainable development	<ul style="list-style-type: none"> ✓ The proposed density of 137 dph, which is an effective use of the site, meets national policy (of at least 45 dph) ✓ It is therefore considered that the proposal is compliant with the objective of intensifying development on this sustainably located site
MT2 – Continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport	<ul style="list-style-type: none"> ✓ The site is located in close proximity to the existing and proposed bus network, which has sufficient existing and future capacity to cater for the proposed development
MTO4 – To support improvements to the city’s bus network and related services to encourage greater usage of public transport in accordance with the objectives of the NTAs strategy and the government’s “Smarter Travel” document	<ul style="list-style-type: none"> ✓ A traffic management plan is included in this application, which seeks to promote modal shift from the private car to other forms of transport
MT10 – To provide 30kph speed limits and traffic calmed areas at appropriate locations throughout the city and subject to stakeholder consultation	<ul style="list-style-type: none"> ✓ The proposed development is DMURS compliant
MT11 – To continue to promote improved permeability for both cyclists and pedestrians in existing urban areas in line with the National Transport Authority’s document “Permeability – a best practice guide”	<ul style="list-style-type: none"> ✓ The proposal is accessible by both pedestrian and cyclists and is considered to be permeable and consistent with this policy and document

Policy / Objective	Statement of Consistency
MTO9 – To develop, within the lifetime of this plan, the Strategic Cycle Network for Dublin city, to bring forward planning and design of the Santry River Greenway, incorporating strongly integrative social and community development initiatives	✓ The proposed development is integrated both within the scheme itself and also providing links to the wider surrounding community
MTO15: To provide Sheffield Stand type parking near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres , churches etc	✓ A total of 650 bicycle parking spaces are provided for in a range of locations throughout the site. The proposed stand type would be Sheffield type parking
MT12 – To improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all	✓ The proposal is accessible by both pedestrian and cyclists and is considered to be permeable and consistent with this policy in creating a pedestrian environment that is safe and accessible to all
MT13 - To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.	<ul style="list-style-type: none"> ✓ The TTA includes a Mobility Management Plan, which includes the following objectives: <ul style="list-style-type: none"> ○ To discourage private car as a means of travel to and from the development; ○ To increase and facilitate the number of people choosing to walk, cycle or travel by public transport to the development; ○ To work with DCC, the National Transport Authority and public transport providers to support and encourage resident and staff up take; ○ To develop an integrated and unified public transport, private vehicle, business fleet management and suppliers of commercial services to the development; and ○ To liaise and co-operate with adjacent developments in relation to a coordinated approach to Mobility Management between the various employment areas.
MTO23 - To require Travel Plans and Transport Assessments for all relevant new developments and/or extensions or alterations to existing developments, as outlined in Appendix 4.	✓ The application is accompanied by a Travel Plan which is included in the Traffic and Transportation Assessment
MTO25 - To support the growth of Electric Vehicles and e-bikes, with support facilities as an alternative to the use of fossil-fuel-burning vehicles, through a roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations.	✓ It is proposed that 6% of the total spaces (i.e. 24 spaces) would be electric vehicle spaces
MT17 - To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.	<ul style="list-style-type: none"> ✓ The proposed car parking provision for the residential element of the development has been identified in relation to the guidance received from the DCC TPD. ✓ It is proposed to provide a quantum of 0.79 car parking spaces per residential dwelling.
MT18 - To encourage new ways of addressing the parking needs of residents (such as car clubs) to reduce the requirement for car parking.	<ul style="list-style-type: none"> ✓ Given the above provision is below the DCC Development Plan (Maximum) car parking standards, which recommend 1 space per unit, AECOM has assessed the projected car parking demand for perspective residents of the

Policy / Objective	Statement of Consistency
	development, which is outlined in Section 5 of the TTA

Table 7.7– Statement of Consistency on traffic

7.79 Overall, the TTA has considered the transport implications of the proposed development. It demonstrates that the development can be readily accessed by sustainable modes and that the surrounding road network has the capacity to accommodate the vehicular traffic generated as a result of the proposed development.

7.80 In terms of the public transport capacity and if it can cater for the projected population from the proposed development the Section 11.3.2 of the TTA states:

The estimated total number of public transport users (two-way) generated by the proposed development during the morning and evening peak hours is 85 and 68 trips respectively. This demand can be facilitated through the existing public transport facilities within the area. The proposed development is situated within an ideal location and currently benefits from existing sustainable travel facilities such as Dublin Bus (immediately adjacent to the site) and the DART (19 minute walk).

Dublin Bus caters for approximately 1,200 passengers per hour, through the existing 4 bus routes whilst the DART caters for at least 1,200 passengers per hour.

From onsite observation the existing public transport services immediately adjacent to the site are currently well utilised and benefit from residual capacity during the peak hours of the day.

The NTA's proposed Bus Connects stops on Malahide Road will also help facilitate additional demand for public transport in the local vicinity of the site.

7.81 Accordingly the TTA concludes that the proposals will not result in a material deterioration of existing road conditions and as a result there are no significant traffic or transportation related reasons that should prevent the granting of planning permission for the proposed development.

Waste Management, Remediation, Noise, Air Quality and Lighting

7.82 Table 7.4 provides a direct statement of consistency response to those relevant policies and objectives on these matters.

Policy / Objective	Statement of Consistency
SI017 - To promote the re-use of building materials, recycling of demolition material and the use of materials from renewable sources. In all developments in excess of 10 housing units and commercial developments in excess of 1000 sq.m, a materials source and management plan showing type of materials/proportion of re-use/recycled materials to be used shall be implemented by the developer.	✓ Demolition waste shall be separated, recycled and disposed of as outlined in the CEMP.
SI23 - All potentially contaminated sites shall be remediated to internationally accepted standards prior to redevelopment. Any unearthed contaminants will require some form of remediation measures which may require a licence from the Environmental Protection Agency (EPA).	✓ A comprehensive site investigation has been carried out to identify the chemical nature of the materials in order that it be processed at suitable disposal sites.
SI020 - To promote sustainable design and construction to help reduce emissions from the demolition and construction of buildings.	✓ The design of the development shall include sustainable materials (e.g. GGBS in concrete).
SIO21 - To encourage the use of internal ducting / staircores within all new mixed-use developments, where appropriate, to facilitate	✓ It is proposed to remove all existing services prior to commencement. All new services

Policy / Objective	Statement of Consistency
air extraction / ventilation units and other associated plant and services.	proposed for the development will be located either underground or in the basement.
SI25 - To seek to preserve and maintain air and noise quality in the city in accordance with good practice and relevant legislation.	✓ The Air Quality chapter of the EIAR states that the proposed and existing residents will not experience significant air quality impact
SIO27 - To give careful consideration to the location of noise-sensitive developments, including the horizontal and vertical layout of apartment schemes, so as to ensure they are protected from major noise sources where practical.	✓ The land proposed for residential development is zoned for such a use, which has been designed to provide an efficient use of land. It should be noted there are no major noise sources in and around the site to be protected from
SI26 - To ensure that the design of external lighting proposals minimises light spillage or pollution in the surrounding environment and has due regard to the residential amenity of the surrounding area.	✓ This planning application is accompanied by a Lighting Statement and supporting drawings which have been prepared by Metec Consulting Engineers. The design of which has been prepared in accordance with:
SI27 - To require lighting design to be appropriate to the end use in relation to residential areas, footpaths, cycle paths, urban streets and highways, i.e. use of low-level bollard lighting along cycle paths.	<ul style="list-style-type: none"> • BS 5489-1:2013 Code of Practice for the Design of Road Lighting; • NSAI EN I.S. 13201-2 Road Lighting Performance Requirements; and • Dublin City Council General Specification for Public Lighting Design and Installation in Residential, Industrial and Commercial Developments in the Dublin City Council Area

Table 7.8 – Statement of Consistency regarding Waste Management, Remediation, Noise, Air Quality and Lighting

Archaeology / Cultural Heritage

7.83 Chapter 13 of the EIAR includes the assessment of the baseline archaeological, architectural and cultural heritage environment, to evaluate the likely impacts that the proposed development will have on this environment and, where appropriate to suggest mitigation measures to ameliorate potential impacts, in accordance with the policies of:

- Department of Culture, Heritage and the Gaeltacht;
- The National Monuments Acts (1930-2005);
- Dublin City Development Plan; and
- Best practice guidelines.

7.84 Policy CHC18 of the DCC DP supports and promote a strategy for the protection and restoration of the industrial heritage of the city's waterways, such as the River Dodder, including retaining walls, weirs and millraces.

7.85 It recommends that the cut stone bridge be retained *in situ*, which the proposal does. Overall, the chapter concludes that if the recommendations are fully implemented the residual impacts of the proposed development on the local archaeological resource would be negligible. In parallel the proposal is in accordance with DCC DP which protects the heritage of the city waterway.

Other Pertinent Matters

Creche

- 7.86 Paragraph 2.4 of the Childcare Facilities (Guidelines for Planning Authorities) (2001) states that planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary, for example, development consisting of single bed apartments, or where there are adequate childcare facilities in adjoining developments. For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate. This is referenced in Appendix 13 (Guidelines for Childcare Facilities) of the DCC DP.
- 7.87 The proposed development is anticipated to generate c. 76 children (based on the 2001 guidelines and 2018 apartment guideline methodology), which have been calculated as follows:
- 2001 Guidelines / 2018 Apartment Guidelines: 495 (total no. of units) – 61 (studios) – 150 (1 bed apartment's) = 284 / 75 = 3.79 x 20 = 76 children (rounded up).
- 7.88 The creche is envisaged to be a full day care, and whilst it is envisaged 76 children could be generated from the proposed development, the creche has been designed for 80 no. children (which has used the space requirements outlined on page 93 of the DCC DP), to allow for some flexibility of space.
- 7.89 At this stage the hours of operation are likely to be:
- Proposed hours of operation
 - 8am to 18.00 (Monday to Friday),
 - 8am to 13.00 (Saturday).
 - Closed Sundays and bank holidays.
- 7.90 However, this could be reviewed if necessary, with external open space provision provided within the confines of the creche facility at the first-floor level.
- 7.91 The location of the proposal has been identified as the most appropriate within the site, when factoring in its relationship with the parkland to the north and is of a scale that meets the needs arising from the proposed development. There are safe and convenient arrangements for dropping off and collecting of children and staff car parking is proposed with the overall total number of parking spaces with the creche.
- 7.92 Overall, as the proposed building is located adjacent to the site entrance, in the same location, albeit larger than the existing building, this part of the proposal is compatible with the overall policies for the zone. It includes uses that are predominantly identified as “open for consideration” in the DCDP, which have been assessed in this planning and statement of consistency report.
- 7.93 The landscape masterplan shows that the remaining lands within the Z9 zoning of the site are proposed as open space / outdoor space and therefore consistent with the wider objectives for Z9.

Part V

- 7.94 Platinum Land Ltd agrees to accept a condition on a grant of planning permission, if the Planning Authority is minded approving the proposed development, which requires the applicant to enter into a Part V agreement with Dublin City Council as per their requirements prior to the commencement of development. A validation letter from Dublin City Council is submitted as part of this application.
- 7.95 A total of 49 units are proposed with a breakdown set out below, which represents up to 10% of the 495 units proposed. It is Platinum Lands' intention to lease these units on a 25-year lease to Dublin

City Council (DCC) at 85% of market rent. This rent will be set at the time based on an independent valuer's calculations. Platinum Land also intend using the DCC standard lease.

DCC Part 5 Housing		
Unit Type	Unit Total	DCC Part V Units
Studios	61	5
1 Bed	150	15
2 Bed (3 person)	3	0
2 Bed	175	18
3 Bed	106	10
Total	495	49

Table 7.9– Part V Proposal

- 7.96 Please refer to the Part V Allocation Site Plans and schedule of accommodation for full details.

Response to An Bord Pleanála Pre Application Consultation Opinion

- 7.97 An Bord Pleanála's PAC Opinion was issued on the 5th December 2018. Four issues were outlined by ABP that needed to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

- 7.98 Each of the four issues are outlined below, as well as a cross reference as to where each has been responded to in this planning application submission

1. Height, Scale and Density

Further consideration and/or justification of the documents as they relate to the development strategy for the site in respect of the proposed height, scale and density of the proposal particularly in the context of the suburban location of the site. In addition to the consideration of National Policy and Guidelines, particular regard should be had to the 12 criteria set out in the Urban Design Manual, which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009), commencing with Criteria No. 1 Context. In addition, any justification should have regard to the proximity to and frequency of public transport services, existing and proposed, and to the location of the site vis-a-vis such services. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

- 7.99 Please refer to Section 6 of the Architectural Design Statement prepared by Plus Architecture which responds directly to the issue raised.

2. Design and Layout

Further consideration and/or justification of the documents as they relate to the proposed strategy for the development of the site in respect of the design and layout of the proposal particularly as it addresses interfaces with the public realm and adjoining boundaries where proposed streets are created. Particular regard should be had to creating suitable visual relief and permeability in the treatment of elevations. Furthermore, the layout should address the creation of usable, amenable and high quality public and semi-private open spaces within the development particularly in respect of the proposed configuration of Block B. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage

- 7.100 Please refer to Section 6 of the Architectural Design Statement prepared by Plus Architecture which responds directly to the issue raised.

3. Residential Support Facilities and Residents Services and Amenities

Further consideration and/or justification of the documents as they relate to the internal layout of the proposed development, having particular regard to the nature, quantum, size, distribution and compatibility of residential support/communal facilities and their location within the overall development and the provision of a greater range of communal uses and spaces. Particular regard should be had to Part (b) of SPPR7 of the Sustainable Urban Housing, Design Standards for New

Apartments 2018. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

- 7.101 Please refer to Section 7 of the Architectural Design Statement prepared by Plus Architecture which responds directly to the issue raised.

4. Car Parking

Further consideration and/or justification of the documents as they relate to the proposed car parking strategy for the proposed development, having particular regard to the level of parking proposed, how it is intended that it is assigned and managed and measures proposed to address shared car parking and visitor parking.

Further regard should be had to the interface and potential conflict between car users and pedestrians at the entrance to proposed Block B. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

- 7.102 Please refer to Appendix A of the Transport and Transportation Statement prepared by Aecom which responds to the issue raised.

Phasing and Structure of Planning Decision

- 7.103 The proposed development would be delivered through 4no. key phases, the details of which are outlined in the proposed description of development, and for referenced are summarised below:

- Phase 1 – Demolition and Site Clearance / Preparation
- Phase 2 – Basement
- Phase 3 – The Residential Development Proposal
- Phase 4 – Highway / Pedestrian Improvements

- 7.104 Our client is committed to ensuring that the development is commenced and delivered as speedily as possible.

- 7.105 Therefore, should the Planning Authority be minded granting planning permission for the proposed development, our client is seeking a phased permission, to facilitate the demolition and site clearance stages to be commenced as quickly as possible. In parallel, other matters specifically relating to the latter phases (i.e phase 2 and 3) can be addressed in parallel through the submission of the necessary compliance details, whilst phase 4 could be delivered as the final phase of the overall development

Summary

- 7.106 Based on the assessment at this stage, it is considered that the proposed development is compliant with adopted development plan policy, except that relating to building height, where it is a material contravention to the DCDP. However, in the case of that matter there are material reasons to justify the proposed height exceeding the adopted 16m standard to achieve a compact growth for Dublin, that responds and adheres to national policy and guidelines in 2018.

8.0 Conclusion

- 8.1 In conclusion, this Planning and Statement of Consistency Report has set out the overarching case for the development of this site, which is seeking to deliver much needed homes, responding to the needs of the rental sector, by providing a viable long-term housing solution for those households where home-ownership may not be a priority now.
- 8.2 The proposal has been assessed against national policy and guidelines, regional and local planning policies and objectives. It has been demonstrated that:

Location/ Context

- ✓ The site is an “Intermediate Urban Location” as defined by the Apartment Guidelines (2018) within the existing footprint of Dublin City;
- ✓ The delivery of this vacant brownfield site responds to the national objective of 50% of new city housing within existing Dublin City and the suburbs footprint;
- ✓ The proposed development contributes to the 40% national target of new homes to be on brownfield / infill land, which collectively will meet the national objective to deliver compact growth in Dublin;
- ✓ The site is well served by public transport, with high capacity, frequent service and good links to other modes of public transport;

The Proposal

- ✓ The site can deliver 495 Build to Rent Homes (including 10% Part V provision), at a density of 137 dwellings per hectare, which is in accordance with achieving a minimum density of 45 dph in intermediate urban locations;
- ✓ The proposal will deliver significant open space provision, and adequately mitigating the impact of the loss of the 14no. trees, with a replacement of 269 trees within the site;
- ✓ The public open space will be actively managed by Platinum Land;
- ✓ The proposal is permeable, with links within the site, as well as the surrounding area;

The Assessment

- ✓ The Sunlight, Daylight and Overshadowing Assessment states that in terms of Daylight, 97% of the 580 rooms assessed in the 202 apartments analysed achieve the BRE Guidelines;
- ✓ The adjacent 3rd party nearby residential amenity, in terms of access to daylight and sunlight when compared with their existing baseline experience, will not be compromised as a result of this proposed development;
- ✓ A landscape and visual assessment have been prepared, which demonstrates that there is a lack of visibility except when close by. The close effects are mitigated by the architectural planning form, proportion and finishes;
- ✓ The micro-climate wind assessment demonstrates that;
 - Pedestrian comfort is achieved in all areas of the site in summer;
 - A limited number of areas of the site were identified as being uncomfortable for pedestrians in the **worst-case** winter season;
 - No areas of the site exceed the Lawson distress threshold for able-bodied pedestrians;
 - The distress threshold wind speed of 15m/s for vulnerable pedestrians was found to occur for no more than 5 hours annually in the worst-case area;
 - However, with the introduction of the proposed landscape masterplan, it is expected all pedestrian spaces outlined above to be safe for their purpose of use;
- ✓ The TTA concludes that the development can be readily accessed by sustainable modes and that the surrounding road network has the capacity to accommodate the vehicular traffic generated as a result of the proposed development; and

- ✓ No significant issues arise for noise, air quality or any other issues which can be satisfactorily mitigated through the introduction of standard planning conditions during the construction phase.
- 8.3 This Planning and Statement of Consistency Report demonstrates that the proposed development is largely consistent with the national policy and guidelines, regional (existing and emerging) policy and local planning policy and that the proposal will provide for an effective and efficient use of this brownfield site which is highly accessible and well served by public transport.
- 8.4 It is submitted that the proposed development will provide an appropriate form of high-quality residential development for this sustainably located, vacant, brownfield site.
- 8.5 Overall, it is submitted that the proposed development is consistent with the proper planning and sustainable development of the area and that the proposal should be granted planning permission in this regard.

Appendix 1 – Dublin City Council’s Section 247 meeting minutes

SHD PAC NO: 0047/18

**STRATEGIC HOUSING DEVELOPMENT
PRE -APPLICATION CONSULTATIONS**
V15 Planning Department Dublin City Council
Pre-Application Consultations -(Section 247 Of The Planning And Development Act 2000) Planning Department, Dublin City Council

Date Meeting Requested: 20/8/18 Date Meeting Held: 20/9/18

Attendees:	Planning Officers/ Officials :
PLATINUM LTD	
MCCUTCHEON HALLEY - PLANNING	BRYAN WARD AP
PLUS ARCHITECTS	DIARMUID MURPHY JCB
MOTEC; MITCHELL & AMOL	ROSEMARY COUGHLIN
COLA, ALTEMAR; CMK HOUSING	

O.S Map Provided & Site Outlined: Site Area: 2.5 Sq.m /Ha & 29 open space
Specific Site/Location/Postal Address: CHIVERS FACTORY, COOLOCK

Name of Applicant: PLATINUM LTD
Interest in site: OWNERS

(Must be sufficient interest to make a planning application - evidence of interest may be required)

Planning History (if applicable) Plan No(s): SHD PAC - 0011/18 - 700 APTS & CRECHES

Proposed development: 535 BTR APTS: 67x 1 BED STUDIOS; 269 x 2-BED; 3x 2-BED (3P); 193x 2-BED & 103x 3-BED

CRECHES & CAFE + MANAGEMENT OFFICE BUILDING

Development Plan Zoning Objective: R1 + R4

Proposed Use(s) permissible:

Open for Consideration:

PROPOSED NO. OF RESIDENTIAL UNITS: APTS: 535 HOUSES: 0

PROPOSED NO. OF STUDENT BEDSPACES: 0

FLOOR AREA FOR NON RESIDENTIAL USES:

Have any proposals being agreed with Housing regarding Part V: YES: NO:

IMPORTANT: Part V : Particulars of agreement or proposal to comply with section 96 of the Act (as amended) must accompany a planning application

SHD PAC NO: 0047/18

APPLICANT REFERRED TO THE FOLLOWING D.C.C. DEPARTMENTS/OTHER BODIES

Housing: Drainage: Roads & Traffic: Parks: Irish Water:

Any Other Issues Identified

A MASTER PLAN HAS BEEN DRAFTED TO INCLUDE '2G' CARBON LAMB. DEVELOPMENT SHOULD ALLOW FOR 3/4 DAYLIGHT

DAYLIGHT & DUNLIGHT STUDIOS AND PROVIDE FOR RECESSED WINDOWS - BUT MICRO-CLIMATE SHOULD BE ANOTHER

NORTHERN BLOCKS NOW 6-12 STOREYS - WHICH HEIGHT MAY MEET DRAFT NATIONAL GUIDELINES - BUT QUALITATIVE CRITERIA STILL APPLY. JUSTIFICATION REQUIRED DUE TO DEPARTURE FROM EXISTING CHARACTER

IMPACT OF 3RD PARTY TO BE ASSESSED - ESPECIALLY OVERLOOKING CONCERN RE. PRIVACY FOR GROUND FLOOR UNITS - NEED BUFFERS.

IT WOULD BE PREFERABLE TO KEEP ROAD-SIDE PLANTING AS PART OF TREE STRATEGY.

INTERACTION WITH PUBLIC OPEN SPACE / SANITARY WREN HAS RECENTLY IMPROVED. APPLICANTS HAVE DEALT WITH THIS EFFECTIVELY

PARKING SPACES HAVE IMPROVED; CYCLE PARKING IS COMPLIANCE

CONCERN AS CATCHMENT, CAFO, MANAGEMENT UNIT LOCATED ON '2G' ZONED USE - SPACE LAMB - MAY HAVE TO RELOCATE

A LATER DEVELOPMENT WOULD NOT BE ACCEPTABLE I.E. NOT SOCIALLY INCLUSIVE & IMPACTS ON 3RD PARTY DEVELOPMENT POTENTIAL

Signed: _____

Planning Officer

The carrying out of consultations shall not prejudice the performance of the planning authority of any of its other functions under the Planning and Development Act 2000 (as amended), or any regulations made under this Act and cannot be relied upon in the formal planning process or in legal proceedings (Section 247(3) of the Planning and Development Act 2000 (as amended)).

SHD PAC NO: 0011/18

STRATEGIC HOUSING DEVELOPMENT PRE -APPLICATION CONSULTATIONS

V15 Planning Department Dublin City Council

Pre-Application Consultations -(Section 247 Of The Planning And Development Act 2000) Planning
Department, Dublin City Council

Date Meeting Requested: 30/04/18 Date Meeting Held: 09/05/18

Attendees:	Planning Officers/ Officials :
See attached	See attached

O.S Map Provided & Site Outlined: Site Area: 2.5 Sq.m/Ha + 29 open space

Specific Site/Location/Postal Address: Chivers factory, Leek.

Name of Applicant Platinum Dev

Interest in site
(Must be sufficient interest to make a planning application - evidence of interest may be required)

Planning History (if applicable) Plan No(s):

Proposed development: 700 Apartments & crèche.

Development Plan Zoning Objective: Z1 + 29

Proposed Use(s) permissible:

Open for Consideration:

PROPOSED NO. OF RESIDENTIAL UNITS: APTS: 700 HOUSES:

PROPOSED NO. OF STUDENT BEDSPACES

FLOOR AREA FOR NON RESIDENTIAL USES

Have any proposals being agreed with Housing regarding Part V: YES: NO:

IMPORTANT: Part V : Particulars of agreement or proposal to comply with section 96 of the Act (as amended) must accompany a planning application

SHD PAC NO: 0011/18

Relevant Planning Context/Planning Procedures

Planning Application Procedures/Regulations, Public Notices:

Protected Structure: YES: NO: E.I. S. Required: YES: NO:
500+

Within an A.C.A.: YES: NO: Within an S.D.Z.: YES: NO:

Within LAP Area: YES: NO: Appropriate Assessment/Screening: YES: NO:

Floor Risk impact Assessment D.o.E. 2009: YES: NO:

Storm Water Management Plan: Yes NO:

PRIMARY PLANNING ISSUES

Site Layout and Built Form

Density: Height: Design and Layout: Connectivity and Permeability:

Road and Street Layout / Parking

DMURS: Car Parking: Cycle Parking:

Open Space / Recreation /Facilities

Private Open Space: Communal Open Space: Public Open Space:

Recreational Facilities: Communal Amenities/Facilities: Childcare Facilities:

Development Standards

Mix of Unit Types: Design and Finishes:

Internal Layout/Development Plan Standards:

D PAC NO: 0011/18

APPLICANT REFERRED TO THE FOLLOWING D.C.C. DEPARTMENTS/OTHER BODIES

Housing: Drainage: Roads & Traffic: Parks: Irish Water:

Any Other Issues Identified

Proposed unit no's. increased from 456 to 700 units (height up to 12 stories)
 Need to provide:

- Masterplan - concept, connections, parks, adjacent dev potential
- Public open space - relationship space (building) (need for terrace)
- Layout - shape, courtyards, separation distances, clocks, accessible buildings
 - breakout area / daylight / sunlight
- Apt stds - comply w/ above / aspect / BTR provision / north facing (single aspect)?
- Mix 47% studio / 2 bed (BTR) - compensatory measures / facilities / gym / laundry etc
 - carmen / carab car
- Transport / public transport to justify density? Near Malahide Rd, not city centre / DART
- Height / density - driven by - D.P. / D.P. (potential new national guidelines)
 - context urban design
 - orientation / daylight / sunlight
 - public transport accessibility
- Need high quality dev / design standards.

Signed:  Planning Officer

The carrying out of consultations shall not prejudice the performance of the planning authority of any of its other functions under the Planning and Development Act 2000 (as amended), or any regulations made under this Act and cannot be relied upon in the formal planning process or in legal proceedings (Section 247(3) of the Planning and Development Act 2000 (as amended)).

Attendees

09/05/18

BRYAN WARD - DCC

JASON TAYLOR - DCC

JOHN CASSEY - CORA Consulting Engineers

Paula Gavin - McCutcheon Halley Planning

Nathan Smith - McCutcheon Halley Planning

GAVIN WHEATLON

Andrew Gillick

Maurice Gillick

John Macey

MAURICE RAVAN

PLUS ARCHITECTURE

PLATINUM LAND

Platinum Land

Platinum Land

METEC CONSULTING

SHD PAC NO: 10004/18

**STRATEGIC HOUSING DEVELOPMENT
PRE -APPLICATION CONSULTATIONS**
 V15 Planning Department Dublin City Council
 Pre-Application Consultations -(Section 247 Of The Planning And Development Act 2000) Planning
 Department, Dublin City Council

Date Meeting Requested: 15/03/18 Date Meeting Held: 10/04/18

Attendees:	Planning Officers/ Officials :
See attached	Mary Conboy Elyon Galt Dermot Murphy Peter Glynn
	Maria Thony, Stephanie Farrington, Kieran O'Neill

O.S Map Provided & Site Outlined: Site Area: 2.5 Sq. m /Ha (3.5 Ha in 29).
 Specific Site/Location/Postal Address: Chivers Factory site, Coolock Drive,

Name of Applicant Platinum Land Ltd.

Interest in site
 (Must be sufficient interest to make a planning application - evidence of interest may be required)

Planning History (if applicable) Plan No(s): ADP 243109 - demolition

Proposed development: 456 apartments | 36 car spaces
 Build to Rent

Development Plan Zoning Objective: 2A 27
 Proposed Use(s) permissible:
 Open for Consideration:

PROPOSED NO. OF RESIDENTIAL UNITS: APTS: 456 HOUSES:

PROPOSED NO. OF STUDENT BEDSPACES

FLOOR AREA FOR NON RESIDENTIAL USES

Have any proposals being agreed with Housing regarding Part V: YES: NO:

IMPORTANT: Part V : Particulars of agreement or proposal to comply with section 96 of the Act (as amended) must accompany a planning application

SHD PAC NO: 0004/18

Relevant Planning Context/Planning Procedures

Planning Application Procedures/Regulations, Public Notices:

Protected Structure: YES: NO: E.I. S. Required: YES: NO: - Screening?

Within an A.C.A.: YES: NO: Within an S.D.Z.: YES: NO:

Within LAP Area: YES: NO: Appropriate Assessment/Screening: YES: NO:

Floor Risk impact Assessment D.o.E. 2009: YES: NO: low risk / speak to Gerry O'Connell.

Storm Water Management Plan: Yes: NO:

PRIMARY PLANNING ISSUES

Site Layout and Built Form

Density: Height: Design and Layout: Connectivity and Permeability:

Road and Street Layout / Parking

DMURS: Car Parking: Cycle Parking:

Open Space / Recreation / Facilities

Private Open Space: Communal Open Space: Public Open Space:

Recreational Facilities: Communal Amenities/Facilities: Childcare Facilities:

Development Standards

Mix of Unit Types: Design and Finishes:

Internal Layout/Development Plan Standards:

HD PAC NO: 0004/18

APPLICANT REFERRED TO THE FOLLOWING D.C.C. DEPARTMENTS/OTHER BODIES

Housing: Drainage: Roads & Traffic: Parks: Irish Water:

Any Other Issues Identified

(279 spaces need to be avoided based on road / grade overkill) Cycle standards

Direct contact Talk I.W

Public o/s - Railed in - take in charge? Skerway / Tree survey

Water quality in river / Make greening - green infrastructure - drainage discharge to river? / Flood risk assessment take account design

Plinth block onto park / relationship between elev & park
→ revisit / active / make like a square?

Layout / courtyards & lower units / need for sunlight & daylight study residents adjacent site

Quality courtyards / onto onto courtyard

Circle o/s boundary

Potential smaller open space within dev / small breakout space

MP - how link to dev potential of adjoining / not prejudice

Design treatment - make modulation: variation / less repetition

Height - D.P. steps / ~~max~~ props height adjacent o/s to Need ensure quality amenities

Balconies - desirable / onto balconies

Community facilities - need quality access? / facilities

Community facilities quality

Need Comply apartment standards.

Signed: [Signature] Planning Officer
10/04/18

The carrying out of consultations shall not prejudice the performance of the planning authority of any of its other functions under the Planning and Development Act 2000 (as amended), or any regulations made under this Act and cannot be relied upon in the formal planning process or in legal proceedings (Section 247(3) of the Planning and Development Act 2000 (as amended).

Attendance

10/4/18

Mary Lowry	- Planning - DCC
Peter Glynn	- Drainage - PCC
Maria Sheary	- Drainage Planning - OCC
Stephanie Farrington	- Roads + Traffic
Giam O'Neil	DCC PARKS.
ANDREW GILLICK	PLATINUM LAND
Maurice Gillich	Platinum Land
JOHN CASEY	CORA Consulting Engineers.
Martin Rogers	CORA / Transport plan
GAVIN WHITLEY	PLUS ARCHITECTURE
Roie Mamane	Plus architecture.
Ciaran McCabe	Metec Consulting Engineers
SEANUS MCCARTHY	MITCHELL + WHITTE.
BRYAN WARD	OCC PLANNING.
Piarruió Quahy	OCC PLANNING
Paula Galvin	MIT Planning
The Sheary	Platinum

Appendix 2 – An Bord Pleanála Pre Application Consultation Opinion



An
Bord
Pleanála

Case Reference:

ABP-302757-18

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 535 no. build to rent residential units, creche, cafe, management office, communal facilities and associated site works.

Former Chivers Factory Site, Coolock Drive, Coolock, Dublin 17.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Height, Scale and Density

Further consideration and/or justification of the documents as they relate to the development strategy for the site in respect of the proposed height, scale and density of the proposal particularly in the context of the suburban location of the site. In addition to the consideration of National Policy and Guidelines, particular regard should be had to the 12 criteria set out in the Urban Design Manual, which

accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009), commencing with Criteria No. 1 Context. In addition, any justification should have regard to the proximity to and frequency of public transport services, existing and proposed, and to the location of the site vis-a-vis such services. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

2. Design and Layout

Further consideration and/or justification of the documents as they relate to the proposed strategy for the development of the site in respect of the design and layout of the proposal particularly as it addresses interfaces with the public realm and adjoining boundaries where proposed streets are created. Particular regard should be had to creating suitable visual relief and permeability in the treatment of elevations. Furthermore, the layout should address the creation of usable, amenable and high quality public and semi-private open spaces within the development particularly in respect of the proposed configuration of Block B. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage

3. Residential Support Facilities and Residents Services and Amenities

Further consideration and/or justification of the documents as they relate to the internal layout of the proposed development, having particular regard to the nature, quantum, size, distribution and compatibility of residential support/communal facilities and their location within the overall development and the provision of a greater range of communal uses and spaces. Particular regard should be had to Part (b) of SPPR7 of the Sustainable Urban Housing, Design Standards for New Apartments 2018. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

4. Car Parking

Further consideration and/or justification of the documents as they relate to the proposed car parking strategy for the proposed development, having particular regard to the level of parking proposed, how it is intended that it is assigned and managed and measures proposed to address shared car parking and visitor parking.

Further regard should be had to the interface and potential conflict between car users and pedestrians at the entrance to proposed Block B. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. A report that specifically addresses the proposed materials and finishes of the proposed structures including specific detailing of finishes, openings and privacy screening, the treatment of balconies, landscaped areas, pathways, entrances and boundary treatment/s. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long term management and maintenance of the proposed development.
2. A public realm and permeability strategy which outlines how the proposed development can be accommodated within the existing public realm with particular regard to pedestrian crossing facilities and access to and through the proposed development.
3. A report that addresses residential amenity specifically how the development will limit the potential for overlooking and overshadowing within the proposed development. A comprehensive daylight and sunlight analysis addressing proposed units and open spaces should also be included.

4. A report should include full and complete drawings including levels and cross sections showing the relationship between the development and adjacent residential units and adjoining public pathways.

5. A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2018.

6. 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).

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. National Transport Authority
2. Minister for Culture, Heritage and the Gaeltacht
3. Heritage Council
4. An Taisce — the National Trust for Ireland
5. Irish Water
6. Dublin City Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.



Tom Rabbette
Assistant Director of Planning
JPR December, 2018

Variation (No. 5)

of the

Dublin City Development Plan

2016-2022

Adopted by City Council on 5th March 2018

The Statutory Display of Variation (No. 5)
to the Dublin City Development Plan 2016-2022
was on view to the public from
9th January to 6th February 2018 inclusive
Monday to Friday (excluding bank holidays)
between the hours of 9.30 a.m. and 4.30 p.m. at the

Dublin City Council
Civic Offices,
Ground Floor, Block 4,
Wood Quay,
Dublin 8.

**VARIATION (NO. 5) OF THE DUBLIN CITY
DEVELOPMENT PLAN 2016 – 2022**

**RE: Variation of Dublin City Development Plan 2016-2022:
Site at the former Chivers Factory, Coolock Drive, Dublin 17**

PROPOSAL

This Variation of the Dublin City Development Plan 2016-2022 changed the land use zoning of the subject lands at the site at the former Chivers Factory, Coolock Drive, Dublin 17

From: Zoning Objective Z6 – To provide for the creation and protection of enterprise and facilitate opportunities for employment creation.

To: Zoning Objective Z1 – To protect, provide and improve residential amenities.

The Variation area is delineated on the attached map.

SITE LOCATION AND DESCRIPTION

The former Chivers Factory site is a 2.5 Ha area located on Coolock Drive. The site, which is generally flat, has one gated entrance off Coolock Drive with a small security gate building. The factory is surrounded by a significant amount of hard standing. This unit has been vacant for a significant period of time and is currently advertised To Let according to signage on site. The site is directly opposite a two storey residential development (Coolock Drive) and directly adjoins a conservation zone Z9 area which bounds the Santry River. The site is also close to a proposed BRT Route (Clongriffin to Tallaght line).

Adopted by City Council on 5th March 2018

The subject site is a 2.5 Hectare part of a larger Z6 land parcel which is generally located between Coolock Drive to the north west, Oscar Traynor Road to the south and Malahide Road to the south east. Green space containing the Santry River is located to the north east, and this space is directly adjacent to Greencastle Road. The junction of the M50 and M1 motorways is c2.5km away and Dublin Airport is c4.3km away.

PURPOSE OF THE VARIATION

The Planning Authority considers that it is appropriate to change the zoning of the subject lands from Z6 (Employment/Enterprise) to Z1 (Sustainable Residential Neighbourhoods).

The unit and associated land has been vacant for a significant period of time and it is considered that the site has limited future potential as an industrial factory type unit. Given the location of the site, in particular adjacent to the river and conservation area, and access off a more residential street, residential redevelopment of the site would be appropriate

It is an objective of the Dublin City Development Plan 2016-2022:

CEEO4: (i) To carry out a targeted survey of those industrial estates with likely redevelopment potential and to make recommendations on how that redevelopment potential might be best achieved.

(ii): To carry out a study on the potential of lands zoned for enterprise and employment space, the adequacy of such potential supply, and the issue of underutilised/vacant lands

This survey process is currently underway and in general it is considered inappropriate to engage in piecemeal rezoning exercises in advance of the completion of this strategic study. Z6 zoned lands play an important role in the City's economy in terms of employment and activity. They constitute only 6% of the zoned land in the City Council area and as such need to be carefully considered. As is stated in section 14.8.6 of the Development Plan; it is considered that Z6 lands constitute an important land bank for employment use in the city, which is strategically important to protect. The primary objective is to facilitate long-term economic development in the city region.

However, having regard to the site specific nature of the subject site being vacant for a significant period of time despite active attempts at new uses being found and by virtue of its location adjacent to residential uses and an open space/conservation area, it is considered in this particular case that rezoning of a discrete portion of the overall Z6 lands is appropriate. The subject site is 2.5 Hectares in size. This is set within an overall Z6 zoning of 12.5 Hectares on the larger Chivers/Cadbury's site. There is a significant Z6 zoned estate to the north of the site across Greencastle Road of 27.8 Hectares. As such it is considered that there is sufficient Z6 land in the area to provide an economic base for the area.

Considering the demographic make-up of the area, a mixed tenure development would be the most suitable.

Adopted by City Council on 5th March 2018

Having regard to the potential residual Z6 lands and associated uses, it is important that the transition between land use zones is carefully managed in order to protect any environmentally sensitive new uses on the site from the existing adjacent uses or the potential of the adjacent sites to accommodate employment generating uses into the future. This is addressed in section 14.7 of the Dublin City Development Plan 2016-2022.

STRATEGIC ENVIRONMENTAL APPRAISAL

The Planning Authority determined, using the screening criteria set out in Schedule 2A Planning and Development Regulations 2001-2004, the DoEHLG SEA Guidelines and Annex 2 of Directive 2001/42/EC, that a Strategic Environmental Assessment was not required for this Variation to the Dublin City Development 2016-2022 set out above.

APPROPRIATE ASSESSMENT SCREENING

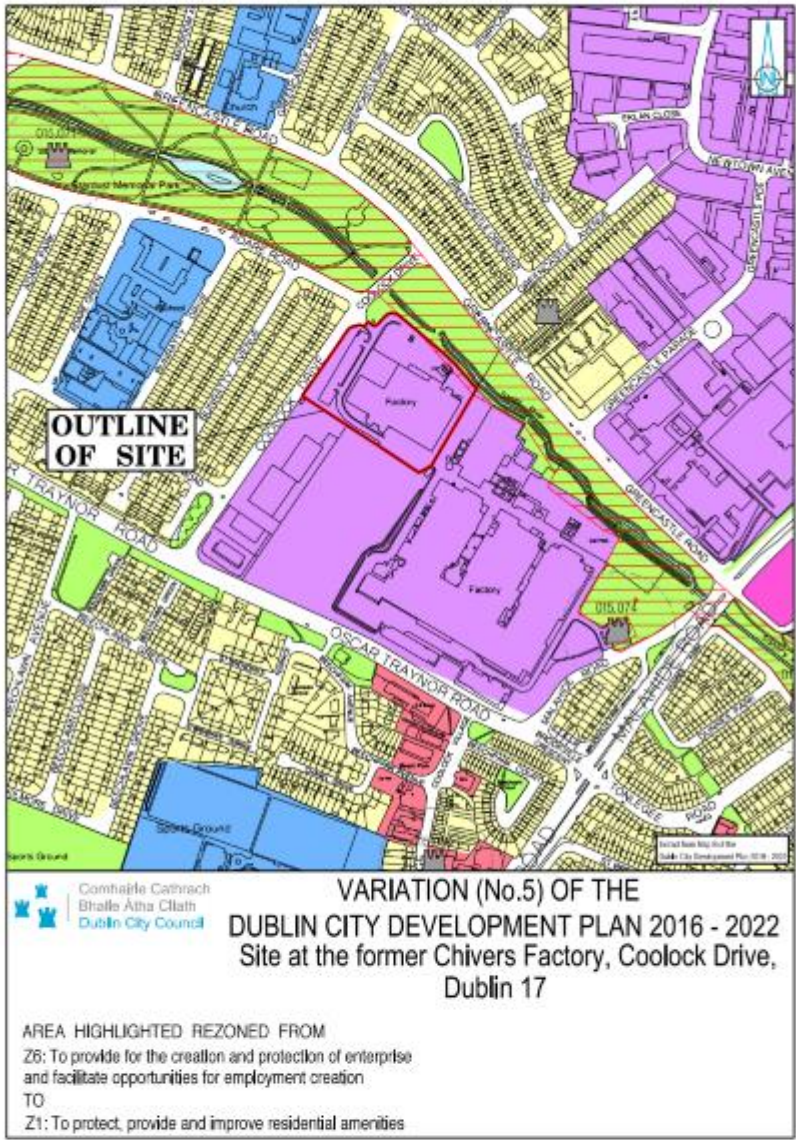
An Appropriate Assessment Screening was undertaken of the Variation of the Dublin City Development Plan, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The Variation was not predicted to have a likely impact on the key features or the conservation function of any Natura 2000 sites.

The prescribed bodies were notified of the above determinations in relation to SEA and AA, and no objections have been received within the appropriate period.

WRITTEN SUBMISSIONS OR OBSERVATIONS

Written submissions or observations with regard to the Variation made to the Planning Department within the said period were taken into consideration before making the Variation.

Adopted by City Council on 5th March 2018



Adopted by City Council on 5th March 2018