

Response to An Bord Pleanála Pre-application Consultation Opinion

Proposed Strategic Housing Development 'The Connolly Quarter'
Rear of Connolly Station, Sheriff Street Lower, Dublin 1

October 2019



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1. Introduction

1.1 Introduction

This report addresses the 5 no. general items and 12 no. specific information requirements requested by An Bord Pleanála (ABP) in their Notice of Pre-Application Consultation Opinion (case ref. ABP-304248-19) issued on the 18th June 2018 in relation to the proposed strategic housing development (SHD) at a site adjacent to Connolly Station, Sheriff Street Lower, Dublin 1.

2. Statement of Response to General Matters

2.1 Compliance with SHD Legislation

The applicant should satisfy themselves (and demonstrate to the Board at application stage) that the proposed development can be considered under the provisions of the SHD legislation noting inter alia the definition of other uses sets out in Section 3 (ii) (I) of the Planning and Development (Housing) and Residential Tenancies Act 2016 and specifically that a maximum of 4,500 sq. metres gross floor spaces for such other uses may be provided for in any development noting. This should be considered in the context of the proposal to include the car park at basement level that provides for car parking and floorspace not specifically related to the SHD development.

The proposal provides for 741 residential units in a BTR (build-to-rent) scheme with an overall gross floor area of 68,535 sq. metres which includes 1,444 sq. metres of ancillary residential amenity and facilities to support the proposed development. In addition, the proposal provides for a basement of 7,253 sq. metres consisting of plantroom, residential support facilities, residents carparking (58 spaces), and cycle parking, all ancillary/incidental to the proposed residential development. Note: this basement has been reduced in area from that submitted to An Bord Pleanála in respect of the Pre-Application Consultation (PAC) which provided for 14,617 sq. metres of basement area.

The subject site area of the SHD application extends over the entire site area which is the subject of a Development Agreement between CIE and the applicants Oxley Holdings Ltd.

This SHD application is designed to be standalone, independent of and not intertwined with any other proposed development.

The subject site has been amended and enlarged, with the consent of CIE, from the site submitted as part of the Pre-Application Consultation in response to the comments made and the Opinion obtained from An Bord Pleanála in relation to pedestrian linkages.

There are a number of existing protected structures located within the subject site boundary and their inclusion is solely to facilitate enabling works to protect them and their architectural integrity during construction.

It should be noted that a separate non-SHD component that forms part of the Masterplan Framework proposal consisting of 2 no. office blocks and a hotel will form part of a separate application under Section 34 to be submitted directly to Dublin City Council for consent at a later stage.

Regarding “other uses” this application provides for 1,444 sq. metres of residential amenity and facilities which support the proposed 741 BTR residential units. Section 3(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016 refers to the “cumulative gross floor area of the houses”. Uses that are deemed to be ancillary or incidental to an actual house are provided for in the calculation of gross floor area. Accordingly, the proposed amenities and facilities including gyms, meeting rooms, concierge, plantrooms, car

parking, cycle parking, of which there is a total floor area of 1,444 sq. metres are all considered to be ancillary and are not considered to be part of “other uses” for the purpose the definition under section 3 (1) of the Act.

The proposed development provides for a total of 3,142 sq. metres gross floor area of “other uses” which includes 10 no. units which are located at ground floor level throughout the development for uses that include retail, and community purposes. This area is well within the limitation of 4,500 sq.m referred to in Section 3(ii)(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

In relation to carparking the applicant and design team have taken cognisance of the concerns and comments raised by An Bord Pleanála and others during the Pre-Application Consultation phase with regard to the volume of carparking and have amended the carparking strategy accordingly.

The proposed development provides for a total of 58 carparking spaces to be located in the basement which will be available for the exclusive use of the future residents of this BTR scheme. These spaces will be available on a car sharing basis. This is a substantial reduction from that originally proposed as part of the Pre-Application Consultation and takes cognisance of the comments and concerns expressed by the NTA, DCC and ABP in relation to the level of carparking originally proposed and submitted as part of the Pre Application Consultation (PAC) to serve the proposed development. This reduced carparking provision takes cognisance of the unique location of the subject site which is contiguous to one of the major transportation hubs in the country which allows it to be considered for near zero parking.

Currently, the subject site is used by CIE to provide for 390 carparking spaces to meet the operational needs of Connolly Station. This is an established and existing use. As is noted in the legal opinion that forms part of this Submission and Response (see attached Opinion of Michael O'Donnell, BL, which is appended to this Response by way of **Appendix 1**), the agreement that is in place between CIE and the applicants to develop the site is in the nature of a “restrictive covenant running through the land”. The provisions of Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016 refer only to developments that are “proposed”, and as stated in the Opinion attached, the existing established use is not included in this application proposal, nor is it necessary, as the authorisation to allow this existing use is already in place.

Under the terms of this Development Agreement the applicant is required to maintain 180 carparking spaces exclusively for the use of CIE. The masterplan which accompanies this SHD application demonstrates how this will be achieved, with 135 spaces within the SHD component, and 45 spaces within the proposed subsequent Section 34 non-SHD application. Combined, a total of 238 spaces (180 CIE and 58 SHD) will be provided for in the overall development when completed. This figure is a substantial reduction from the current existing capacity of 390 spaces.

The proposed carparking arrangement is similar to that proposed and approved by the Board to UCD for 512 student accommodation units (3,006 no. bed spaces) on their campus site at Belfield - PL060DTA0001 refers. This SHD application provided for a total of 994 no. carparking spaces, comprising 637 no. basement spaces, 32 number surface carparking spaces, an extension to existing carpark to provide for 225 no. spaces, and a further 100 spaces adjacent to a separate academic facility within the campus of UCD. The proposal was approved by An Bord Pleanála subject to a number of conditions, one of which was to omit the 225 surface carparking spaces. It should be noted that in assessing the proposed development the inspector concluded that the proposed development “effectively results in the rationalisation and consolidation of the existing carparking provision on the UCD campus, without any significant additional parking spaces”. The conclusion noted that the proposed carparking arrangement was generally in accordance with “UCD Campus Travel Plan 2016-2021-2026”. This plan is an integrated travel plan which sets out the key objectives for the wider UCD campus over its lifetime. As such, the carparking as approved and provided for as part of the SHD application, provided for a much wider remit than the student bed spaces that were the subject of the SHD planning application.

In the context of the Connolly Quarter, the proposed carparking arrangement is in effect, a rationalisation that will result in a significant decrease in the level of existing onsite carparking. While the proposed SHD application does not propose these 135 CIE carparking spaces for reasons outlined in the legal Opinion attached, the plans submitted do indicate where these spaces will be located. The area identified to maintain this existing carparking provision, i.e. 135 spaces, is the void above the deck which must be constructed to accommodate the proposed residential blocks B1, B2, B3 which over sail the rail sidings. Rather than leave this void empty it is proposed to provide for the continuation of existing carparking use within the space as required by the legal agreement.

The applicant is satisfied that the proposed development is compliant with the provisions of the SHD legislation. The above rationale, together with the legal Opinion obtained and submitted as part of this submission demonstrates that these provisions have been fulfilled with particular reference to the proposed carparking arrangement.

2.2 Development Strategy

Further consideration and/or justification of the documents as they relate to:

- *The height strategy and design approach, particularly the bulk, scale and massing of the 22-storey tower and the need to ensure that the design of the tower and other buildings are exemplar and provides the optimal architectural solution for this strategic site.*

The response to this item should be read in conjunction with Paragraph 3.2 of this Response together with 'The Design Assessment' prepared by Professor Ian Ritchie which is included in Appendix 2. In addition, supporting documentation in the form of 'The Architects Design Statement Section 06 Building Height', the 'Masterplan Document Section 08 Building Height', 'Chapter 6 - Visual Impact Assessment of the EIAR' and the Photomontages all submitted under separate cover address this issue.

The Dublin City Development Plan 2016-2022 establishes the site's suitability to consider building heights of 50m+ - section 16.7.2 refers.

The proposed development is designed to create a high-quality, vibrant and attractive urban neighbourhood on this strategically located regeneration site. The height strategy proposed is a result of a rigorous evaluation and assessment of the performance-based criteria contained in the 'City Development Plan' and "The Urban Development and Building Height 2018 Guidelines'. Supporting documentation (referenced above) that accompanies this application demonstrate how the proposed development is compliant with this national and local planning policy.

The Visual Impact Assessment, (Chapter 6 of the Environmental Impact Assessment Report) confirms that the subject site being an inner-city site is capable of absorbing the proposed height strategy.

The strategic location of the subject site as a gateway to Dublin City has informed both the design and the height strategy for the proposed development. The design approach has also evolved to respond to the distinct qualities of this former brownfield industrial site, adjacent to a major transport hub. The proposed development consists of 8 no. residential blocks (B1, B2, B3, C1, C2, C3, D1 and D2) that range in height from 4 to 23 storeys with a maximum height of 79.45m above ground level. These building heights are compliant with the policy and objectives of the City Development Plan.

National planning policies endorse increased building height and higher densities to improve the sustainability of new development, particularly in strategic regeneration areas such as the subject site, which is brownfield, inner city and adjacent to a major transportation hub. The Urban Development and Building Height Guidelines 2018 policy overlaps with the City Development Plan policy in specifying a performance-based approach to the consideration and assessment of taller buildings (50+) in appropriate urban locations. The development management principles contained in the 2018 Guidelines require that applications for taller buildings address the following:

The relevant city/town - The site is well served by high capacity public transport (Bus, Rail, Dart and Luas) with Connolly Station and Busáras being the key transportation interchange facility for the Dublin Region. The design of the proposed buildings and particularly residential blocks B, C and D1 are set back from adjoining streets, to preserve residential amenity and integrate with the surrounding area. The massing of the taller buildings has been modelled to avoid an overbearing presence on adjoining streets and neighbourhoods and to protect the integrity of existing views and vistas, whilst ensuring a positive addition to the Dublin skyline.

The district/neighbourhood/street – The proposal will make a significant contribution to the locality through the regeneration of this former underutilised industrial site with the creation of a new urban neighbourhood. Staggering of building heights has been incorporated into the design to avoid monolithic, long walls and this approach will be enhanced by distinct building forms and a varied selection of materials/finishes. The proposal will create a new public realm centred on 'Connolly Square' allowing for full integration of this former enclosed and isolated urban site with the surrounding city. New pedestrian linkages will improve legibility and connectivity for future occupants, commuters and the surrounding community.

The site/building – The Masterplan outlines the design approach which has focused on creating a site-specific design response to this strategically located inner city brownfield site. Buildings are modulated and are separated to allow daylight penetration into elevated communal areas and ground level public streets and spaces. Residential blocks are elevated above the Connolly Station rail sidings to optimise use of urban land resulting in panoramic views towards the west of the city.

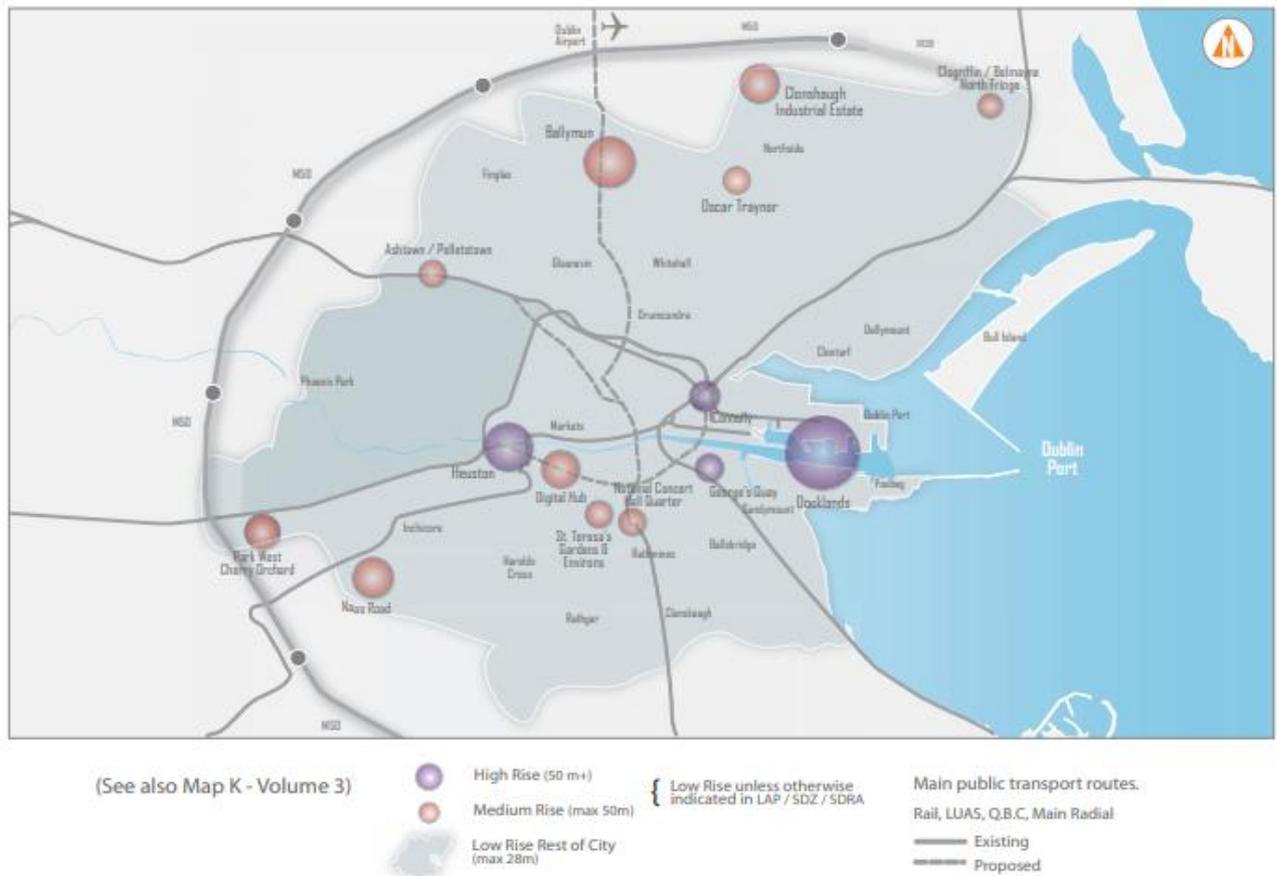


FIGURE 1 EXTRACT FROM DUBLIN CITY DEVELOPMENT PLAN 2016-2022

The Dublin City Development Plan 2016-2022 identifies locations which are suitable for taller buildings. **Figure 1** above is an extract from the City Development Plan (Fig 39) while Fig 2 below is a further extract (Fig K) which identifies Strategic Development and Regeneration Areas (SDRA's) that are appropriate for mid-rise and tall buildings. In both categories the subject site which forms part of Connolly Station is identified as a site suitable for building heights exceeding 50m.

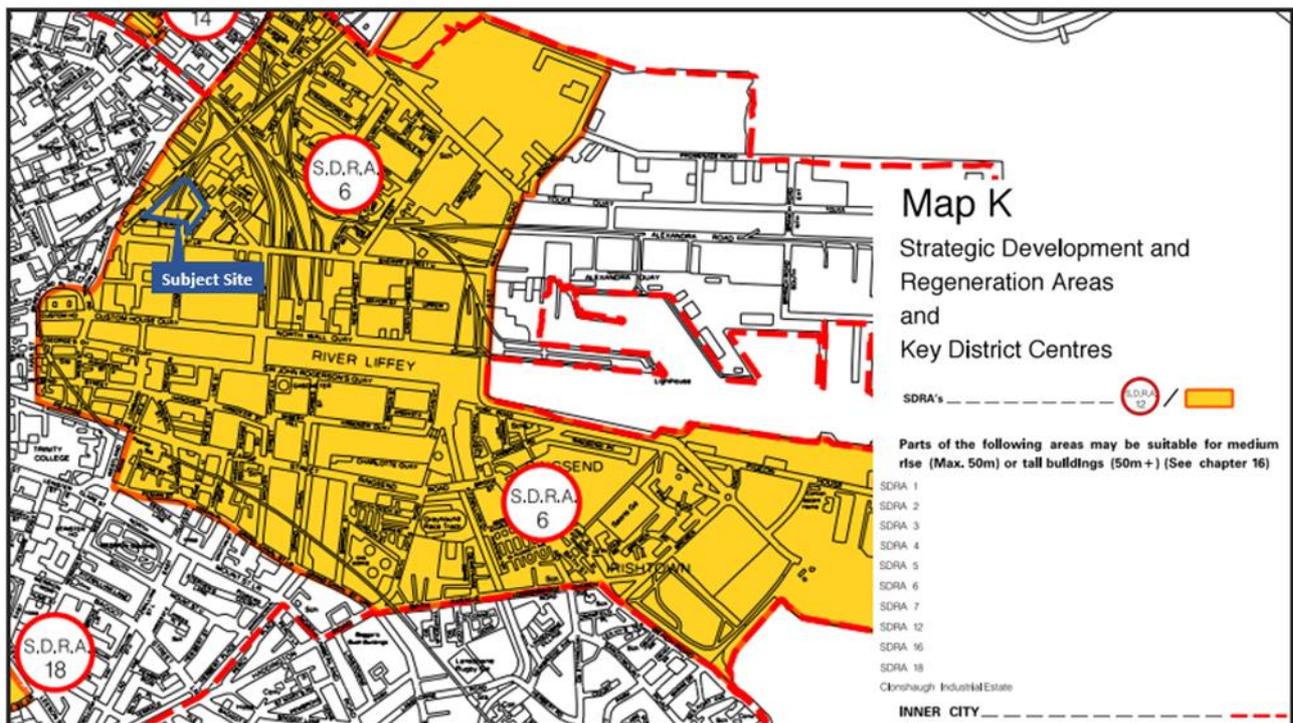


FIGURE 2 EXTRACT FROM DUBLIN CITY DEVELOPMENT PLAN 2016-2022 (MAP K)

Section 16.7.2 of the City Development Plan identifies specific areas where high-rise buildings in excess of 50m will be considered and outlines the assessment criteria for considering such buildings. These criteria have been carefully considered in the design process that has informed this Masterplan and SHD planning application. These criteria are largely mirrored in the development management principles detailed in the 2018 Guidelines which are addressed below:

Relationship to context, including topography, built form, and skyline having regard to the need to protect important views, landmarks, prospects and vistas. The height strategy is considered appropriate having regard to the site context, being contiguous to Connolly rail station and at a strategic entry point to the city centre. Most of the taller buildings are to be located along the site's western boundary adjacent to the railway line. Residential blocks B, C and D1 have been staggered with lower buildings along the eastern boundary of the site. The tallest building (C1) is 23-storeys in height (79.45m) is located centrally so as not to have an overbearing presence along the streetscape and to integrate with the modulated approach to building height throughout the development, creating a peak in the stepped rooflines.

Effect on the historic environment at a city-wide and local level. As can be seen from the accompanying Masterplan and the Architects Design Statement together with the CGI's, the proposed development does not have any adverse impact on historic views and vistas of the city.

Relationship to transport infrastructure, particularly public transport provision. The Dublin City Centre Transport Study 2016 - a joint study undertaken between DCC and the NTA - recognised that Connolly Station together with Busáras was the main transportation interchange facility for the city and region. The proposed development will significantly improve permeability and pedestrian connectivity through the site, enhancing accessibility to this major public transport hub with new linkages between Seville Place /Five Lamps, Connolly Station and Docklands Financial Centre.

Architectural excellence of a building which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for. The tallest building within the proposed development (Block C1) complies with the 3:1 slenderness ratio and the accompanying Masterplan (Section 09) and The Architects Design Statement (Section 07) outline the rationale for the architectural approach. In addition, The Design Assessment (Appendix 2) prepared by Professor Ian Richie also addresses this issue.

Contribution to public spaces and facilities, including the mix of uses. The proposal will contribute to the creation of a dynamic, high-density mixed-use development on this strategically located urban regeneration site. The proposed development has been designed to optimise the site's permeability and to create an attractive public realm for both resident and visitor. As outlined in the accompanying Masterplan, the overall site will ultimately provide a substantial and sustainable mix of residential, commercial, community and retail development that will benefit the local community and create a vibrant new neighbourhood for the north east inner city.

Effect on the local environment, including micro-climate and general amenity considerations. Two Reports prepared by Integrated Environmental Services (IES) which address a) 'Daylight – Sunlight and Overshadowing' and b) 'Pedestrian Wind Comfort CFD' are submitted under separate cover in support of this application. It should be noted that following the Pre-Application Consultation (PAC) a number of modifications were made to the design in response to concerns raised. These modifications are listed in the introduction to the IES Daylight Report. Also, of note is that BRE were engaged by the applicants to review the initial report presented at the PAC. As a result, BRE recommended amendments to the survey methodology. These recommendations were implemented and BRE have confirmed they are satisfied with both the survey methodology and findings – see Appendix 1 to 'Daylight – sunlight and Overshadowing' report. The reports conclude that the proposed development in relation to wind, daylight and sunlight are all within acceptable limits. With regard to shadowing the report notes that there will be an impact, as would be expected for an infill urban environment, but that the impact is no greater than that arising from the extant planning permission granted under Reg Ref No 2863/11.

Providing for these arrangements was a priority for the applicant and the design team in preparing the Masterplan and SHD application. While discussions had been ongoing it was only recently that the applicant secured agreement with CIE to increase the subject site area to create a new pedestrian link to Seville Place through an existing vault (Protected Structure) which is currently used by a local GAA club. The club will be facilitated in the proposed new development. The increased site area also includes additional frontage onto Sherriff Street Lower contiguous to Connolly Station. As a result, the proposed development is now fully integrated with Sheriff Street Lower, Oriel Street Upper and Seville Place, encouraging pedestrian movement through the site from the surrounding area which will assist in integrating this isolated site into the wider north east inner city. The increased activity and mix of uses will also enhance opportunities for passive surveillance and security throughout the area benefitting sur residents, future occupants and commuters.

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. Please refer to the following accompanying 'Masterplan Document', 'Architects Design Statement', 'Sunlight – Daylight and Shadow Report', 'Pedestrian Wind Comfort CFD Report', Chapter 6 of the 'Environmental Impact Assessment Report' (EIAR) and the Photomontages which are submitted under separate cover and which individually and collectively address each of these issues.

Adoption of best practice guidance related to the sustainable design and construction of tall buildings.

The accompanying 'Sustainability and TGD L Report' and 'Building Life Cycle Reports prepared by Homan O'Brien and submitted under separate cover in support of this application address compliance with a range of Building Regulatory, Sustainability and Energy Efficiency standards which are integral to the design and

the ongoing operation and management of the scheme. There are five main criteria that the reports outline and demonstrate compliance with:

- Building Energy Rating
- Energy Performance Coefficient (EPC)
- Carbon Performance Coefficient (CPC)
- Renewable contribution
- Maximum elemental U-Values

Evaluation of providing a similar level of density in an alternative urban form.

Alternative Masterplan Framework solutions were investigated and are described in Section 03 – Site Analysis of the accompanying Masterplan Document. Sketch Options 1 and 2 as described aim to create a new mixed-use urban quarter with a series of blocks arranged around a central public open space. However, while reasonable residential densities were achieved, it was considered that neither option delivered adequately on the following:

- Enhanced site permeability/connectivity to Seville Place.
- The creation of a ground floor streetscape which made new and legible connections to the surrounding area.
- Neither option delivered a sufficient quantity of public open space at ground level.
- A coherent and efficient arrangement of blocks which delivered residential density in an efficient manner.

The treatment, aesthetic design, articulation and animation of the façades and the need to avoid monotonous elevations.

The building facades have been designed in detail to ensure a coherent, legible and architecturally rich proposal which has a distinctive character befitting a site of high urban significance. Please refer to Section 07- Architectural Approach, of the accompanying 'Architects Design Statement' for supporting details and visuals. Key issues considered in informing the proposed design include the following:

A Unique Site Response

The unique industrial site character is juxtaposed against the existing urban fabric which results in an architectural concept that allows for the integration and assimilation of the proposed development into the surrounding city - the core architectural principles are described in detail in the accompanying Masterplan Document.

Legibility + Visual Coherence

Facades are composed in accordance with the internal rationale of the residential unit plans and are based on a carefully designed façade module. A predominantly brick façade materiality responds to the residential human scale with textured brick surfaces proposed at street and garden levels (tactile surfaces) Use of angled white metal cladding to the Block C1 'tower' reinforces its visual presence within the overall building hierarchy.

Architectural Variety

A sequence of varied facades creates a rich and 'unfolding architectural story'. The entire visual story is not revealed from a single viewpoint with façade and building relationships being revealed as visitors move through the layered open spaces. The facades are designed with materials of the highest quality in mind. While there is an inherent legibility of approach between each building, the assembly of materials differs from building to

building to create a subtle richness to the approach. Facades of each building have been considered in detail to deliver an overall visual variety but with detailed façade modules designed with detail, colour and textural variety. The building forms and facades are designed to create a playful and exciting interface with neighbouring buildings.

The provision of appropriate connections and pedestrian permeability through the site, particularly to Connolly Station.

As is outlined above (see section ‘Contribution to permeability and legibility of the site and wider area’) the applicant has secured additional site area from CIE which results in enhanced linkages and permeability from the site to the surrounding street network Seville Place and Sherriff Street Lower. The site is characterised by a series of buildings and high stone boundary walls which while being designated as protected structures contribute to the sense of insularity and isolation from the surrounding inner-city area. The proposed development provides for a number of punctuations in the boundary wall allowing access. These openings have being designed having regard to the conservation status of the structures and the works proposed are both sensitive and minimal and are detailed in the ‘Architectural Heritage Assessment Report’ prepared by Clare Hogan , Conservation Architect and submitted in support of this application under separate cover.

Within the site there are a series of streets and spaces at ground level which publicly accessible at all times. These streets and spaces while providing linkages and connectivity through the site will also act as a destination in their own right through the provision of a series of retail and community uses with frontage at street level.

The Masterplan acknowledges the potential of connecting directly into the Connolly Station platforms/concourse (Mainline, Suburban and Dart platforms) which in turn will optimize footfall through the site linking Connolly Station to the wider Docklands area. While the Masterplan acknowledges this potential and the applicant is engaged in ongoing discussions with CIE to bring about its realisation such connections are outside the subject site boundary and significant technical and engineering issues will need to be resolved before they can be delivered.

Design and treatment of public open spaces to ensure that they are appropriate to the future residential community.

This section should be read in conjunction with the detailed “Landscape Plan” prepared by Bernard Seymour Landscape Architects (BSLA) which is submitted under separate cover in support of this application.

Landscape approach: General principals

The key to providing excellence in urban outdoor space design lies in its integration with inside and outside, with each supporting the other, while offering areas of contrast in a legible and inviting sequence as one move about. This scheme creates a renewed district, connecting existing housing areas, the commercial activity of the north docks to the busy transport hub of Connolly Station. It does so with an appropriately urban, dense scheme, offering diversity of architectural treatment and use, improving the urban grain of the quarter in which it sits. What is perhaps even more exciting is that it sets out to provide this with a rich series of spaces, generous in extent, with a well-connected and proportioned public realm, an extensive semi-private residential and office landscape termed the High Line for now but possibly more like the Promenade des Plantes in Paris than its eponym. In addition to this residential amenity that forms a loop around the site, the residential blocks also have well designed local courtyards, roof gardens and terraces that are associated with the individual blocks and for their exclusive use.

Liaison with Dublin City Council Parks Department

BSLA engaged the Dublin City Council Parks Department in advance of this submission to discuss the general principals of the landscape schemes at each level, as well as targeting specific matters such as site permeability, materials and local community initiative. Specific outcomes of these consultations included; maintaining the existing contextual desire lines from outside the site across the ground level; exploring possible new connections where opportunities permitted such as the new pedestrian + bike route proposed through to Seville Place; public artwork; as well as integrated nonstandard play elements placed within the public realm component of the scheme. Full details of the iterative design process can be found in the BSLA landscape report and scaled drawings appended to this submission.

Integration and community

The landscape proposal announces itself to the city along Sherriff Street, offering entrances to a distinctive public space that is varied in threshold expression, sometimes entered through a covered space, other times through a more conventional gap between buildings. These are all demarcated in a special way by lighting and the appearance of fragments of recovered material as an artistic motif that begin to pattern the public realm with a motif derived from the natural world. Salvage items collected from site works exposed as an aggregate in the concrete units reveal lively assemblages of site-specific artefacts flush in ground, miscellaneous metal components linked by an overarching continuity of materials. Variations in the detail of these begin to form planters of a scale that can accommodate large trees, which in turn can balance the scale of the buildings with that of a human. Close to hand (texture, pattern, tone, composition) signify changes in character, threshold and moments of enhanced quality.

The public realm and its ground plane

The exterior ground plane is defined by two contiguous materials; historic cobbles and bespoke aggregate concrete units. The historic cobbles are intrinsically linked to the heritage of the site and the adjoining Sherriff Street make up a lesser proportion of the proposed scheme for the new plaza and street. Practically they are very suitable for absorbing the irregular interfaces such as colonnades, tricky edges and skewed alignments. The larger bespoke concrete slab forms the primary surface and captures the main routes, nodes and plazas. This combination of materials speaks to the inherent industrial memory of the site. At the same time these interact with the energetic eruptions of the freeform planters that acknowledge this sites evolution over many centuries before the arrival of the train and its attendant muscular architecture.

The treatment of the space is linked with the adjacent ground floor uses and residential entrances, together with its arrangement as a through route connecting to the adjoining streets in a manner that will also generate footfall, sets the place up to be busy and lively.

Here we are making small carefully considered moves that enhances a person's sense of comfort, such as many options for seating and the positioning of this seating. It means that as the sun and shadows move through the site in the cycle of a season and of a day there is always a sunny or sheltered spot to it. Trees are proposed in a relaxed positioning as if the seeded themselves in crevices many years ago. However, they are in fact planted in contained mounds, under planted by a low vegetation that is reminiscent of the karst flora of the Burren as the planted mounds taper away to the edges and provide less substrate. In turn additional ribbons of this low planting emphasise the dynamic naturalistic theme of the place and are planted in a Sylva cell, gravelly substrate that is resistant to compaction and can withstand a great degree of trampling.

A very important invisible but environmentally sensitive task is the public realms co-ordinated approach to water attenuation and a series of explanatory studies are included showing how this works. The outcome of the liaison between the drainage engineer and landscape architect means that every opportunity at each level has been maximized for attenuation and the method of interception and storage in the public realm worked out and integrated at an early stage.

Components of Quality

An array of public functions, cafes and interesting alternative uses populate the visible realm as experienced by the pedestrian, internally and externally. Trees, planting, shelters, paving patterns and innovative surfaces and artefacts make the progression through the space visually stimulating and distinctive. The proportions, sequencing and articulation of the resulting urban spaces mean that matters of identification, orientation and recognition are made clearer and a coherent organization of the scheme can be achieved. In general, the public sequence is characterised by durable materials and bespoke elements, of quality hard landscape.

The high concentration of 1 bed and studio units in the context of the zoning of the site, the need to promote the optimal supply of apartments for a range of needs and aspirations and the need to create long term sustainable communities.

Connolly Quarter is a proposed 741 no. BTR residential apartment development. The current scheme has evolved in response to extensive consultation with Dublin City Council. At the PAC in June 2019, the proposed development comprised 697 no. apartments containing 71.7% studio and one-bedroom units. The current proposal has a revised unit mix of 65.3% studio and 1-bedroom apartments, based on a breakdown of 30.8% studios and 34.5% one-beds. This represents a decrease of 6.4% in studio and one-beds as a proportion of the overall unit mix.

The National Planning Framework includes population projections indicating that the population of Dublin city and suburbs will grow by an additional 235,000 to 293,000 (20-25%) in the years to 2040. To achieve the levels of additional housing needed for the forecast population growth, the policy sets out a range of objectives to achieve more compact cities and sustainable growth. The drive towards sustainable growth is also underpinned by the objectives of the Design Standards for New Apartments Guidelines 2018. Section 5.8 of the Guidelines state that there is a need for greater flexibility in the application of development standards:

“This potential for accelerated housing construction through BTR can make a significant contribution to the required increase in housing supply nationally, identified by Rebuilding Ireland, and the scale of increased urban housing provision envisaged by the National Planning Framework. The potential to augment existing housing delivery models by attracting new investment into the sector will assist in achieving additional housing output.”

In recognition of the significant contribution BTR developments can make to overall housing supply and the specific demands of the rental sector, the **Design Standards for New Apartments Guidelines 2018, make special provision for a more flexible approach to housing mix in BTR schemes:**

Specific Planning Policy Requirement 8: For proposals that qualify as specific BTR development in accordance with SPPR 7: (i) **No restrictions on dwelling mix** and all other requirements of these Guidelines shall apply, unless specified otherwise.

The strategic location of the subject site within the inner city and contiguous to a major public transportation hub is appropriate for this more flexible approach to unit mix and is fully supported by national policy. The proposed unit mix is also deemed appropriate for the Z5 ‘City Centre’ Zoning Objective as it will further promote the inner city as a dynamic, attractive place for urban living and working, in a highly accessible location. It is consistent with one of the primary objectives of this City Centre zone which is *“to sustain life within the centre of the city through intensive mixed-use development.”*

The *Residential Needs Analysis* prepared in respect of this application (see Planning Statement prepared by McCutcheon Halley Planning and submitted under separate cover) provides a **demographic profile of the North Dock Area for the period 2006 to 2016 and demonstrates that there is a clear need for predominantly studio and one-bedroom units.** The analysis indicates that the two Electoral Districts (ED’s)

which make up the northern portion of the Dublin Docklands area (ED's North Dock B and North Dock C) in which the Connolly Quarter subject site is located (North Dock C) have a highly educated, young population, with a high proportion of single people and couples without children.

The 2016 Census of Population identified the total population of the two ED's as 11,909, with a working population of 7,149. Of note, are the following characteristics:

- There is a high proportion of single people (67%) compared with the national average (53.5%);
- The population is young, with 56% of the population in the 20 to 40 age group, compared with the national average of 28%;
- The percentage of 2-person families is high (58% total families) compared with the national average of 7%;
- One person households make up 25.5% of the total households;
- Married and cohabitating couples comprise 20.3% of total households;
- Two person households comprise 39.7% of total households; and
- 27,438 workers commute into North Dock B and C each day, comprising 12,409 commuters from ED's within Dublin City and more than 15,000 people from the Greater Dublin Area and beyond.

Examination of the 2016 census data reveals that 65.2% of all households in the two ED's are comprised of 1-2 person households. This is consistent with demographic trends which indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons. However, despite the substantial rise in 1-2 person households, only 21% of new dwellings completed since that time are apartments.

CBRE Ireland research published in 2019 identifies this deficit as a particular problem within Dublin City, where demand for apartments is greatest:

*"Of the houses developed in Dublin during 2018, 71% comprised scheme houses with only 25% of new housing delivery in Dublin in 2018 comprising apartments despite the fact that this form of housing is clearly in demand from end users. It is therefore not surprising that the proportion of Dublin's rental stock that comprises apartments is amongst one of the lowest in Europe. Only 950 apartments were developed in Dublin City Council local authority area in 2018 – a figure that needs to increase dramatically over the coming years if Dublin is to even attempt to meet end user demand both from purchasers and renters."*¹

It is evident from the 2016 census data that the profile of the local population is generating a significant demand for studio and one-bedroom apartments. In addition, there is an ever-increasing local workforce that would benefit from an increased supply of affordable, suitable accommodation that will meet their needs. This trend is set to remain with the continued expansion of multi-national businesses and FDI in Dublin City:

*"With office-based employment in Dublin expected to increase by another 8.5% over the next five-year period and a large proportion of these jobs expected to be created in the city region (as many as 2,000 new jobs are due to be created by one single occupier (Salesforce) in the Docklands region of Dublin alone), the need for additional residential provision in Dublin City is abundantly clear."*²

Research undertaken on behalf of the American Chamber of Commerce Ireland further reinforces the need for a substantial increase in supply of accommodation for one and two person households:

¹ Viewpoint, Dublin Residential Q1 2019 A Residential Housing Study: The Quantum & Type of Housing Dublin Is Currently Providing vs. What the City Needs CBRE Ireland (p.5)

² ibid p.9

“Further, this paper estimates that in the Greater Dublin Area alone, taking into account the various sources of demand during the period 2017-2022, as well as trends in tenure, over 30,000 new rental dwellings for one- and two-person households will be needed in the city by 2022, largely in or close to central urban locations.”³

The National Competitiveness Council has repeatedly highlighted the substantial threat to Ireland’s competitiveness arising from the severe shortage of available and affordable accommodation.⁴ This position is mirrored in a 2017 report published by the American Chamber of Commerce Ireland:

“The increases reflect imbalances in the supply of and demand for residential housing, particularly in Dublin, where monthly rents have risen by 65% in just over five years. Such imbalances could have a significant effect on the competitiveness of Ireland’s cities as economic regions competing in a global economy.”⁵

It is therefore imperative that the supply of apartments in Dublin better reflect the needs of the housing market, a critical requirement to ensuring Ireland’s economic competitiveness. Provision for housing need should also be undertaken in cognisance of the development viability, consistent with the available evidence, as stipulated in the 2018 Guidelines.

The Government have introduced a range of planning policies since Rebuilding Ireland (2016) that aim to address the undersupply of housing, affordability and sustainability, including a specific rental sector strategy. The BTR model is identified within this policy context as one facet of a broad range of solutions to cater for different cohorts of the population. Support for this type of accommodation is considered necessary to ensure the housing needs of the local population and those working in the North Docklands are met. The BTR model is a specific approach recognised by government that will attract institutional investors into the housing market, addressing the chronic shortage of supply whilst providing much needed rental accommodation with security of tenure. The requirement of SPPR 7 that these types of residential developments shall be owned and operated by an institutional entity for a period not less than 15 years will help provide this longer-term stability to the rental market. Following the 15-year period, the opportunity will exist for these units to revert to other forms of tenure or be adapted / amalgamated in response to changing market conditions and household needs. Thus, the scheme will ensure stability in the current market, whilst ensuring longer term adaptability is addressed and so provides a more sustainable form of development that can respond to the housing needs of the local community.

There is a significant, **ongoing trend toward smaller household size**, reflected in the 2016 census data for the two ED’s with 65.2% of households in this location comprising 1-2 persons.

The subject site is within a strategic urban location close to employment and a major public transport corridor, driving **demand for studio and one-bedroom apartments by young professionals and workers**.

Provision of appropriate housing mix that caters to the needs of smaller households will improve the **international competitiveness of Dublin**.

National policies including the National Planning Framework and Design Standards for New Apartments Guidelines 2018, identify the need for a **more responsive, flexible approach to the supply of housing**, in

³ American Chamber of Commerce Ireland, August 2017, *Growing Great Teams in Ireland: The Role of the Residential Rental Sector* An American Chamber of Commerce Report with Ronan Lyons, Trinity College Dublin (p.4)

⁴ National Competitiveness Council, December 2018, *Ireland’s Competitiveness Challenge 2018* (p.6)

⁵ American Chamber of Commerce Ireland, August 2017 (p.6)

line with overarching objectives for more compact growth, densification and **greater mix of housing type and tenure**.

Continuation of demographic and societal trends mean that the future housing mix will need to be more responsive to the needs of young professionals and workers, families with no children and 'downsizers', as well as older people. It is therefore critical that the next wave of new housing schemes that are developed in the Dublin region contain a greater concentration of one-bedroom and studio units, not least because the proportion of one-person households living in Dublin City (28%) is considerably higher than the national average (23%).

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

Pursuant to the considerations of these issues a number of amendments were made and are included in both the schedule of drawings and the suite of reports submitted in support of this application. In summary these amendments include;

Site Permeability

The applicant has obtained the consent of CIE to submit a larger subject site area. This enlarged site area provides for enhanced connectivity from Seville Place and Sherriff Street lower to the proposed development which results in a total of 5 no access points onto the adjoining public street network.

Architectural Approach

The façade design for each of the buildings has been developed in order to respond to concerns raised regarding 'monotonous and repetitive' design solutions. Facades are composed in accordance with the internal rationale of the residential unit plans and are based on a carefully designed façade modules. While there is an inherent legibility of approach between each building, the assembly of materials differs from building to building to create a subtle richness to the approach. The facades of each building have been considered in detail to deliver visual variety colour and textural variety.

Residential Units – Daylight Quality

The window design has been developed in response to concerns raised in relation to daylight penetration levels to units at lower levels in Block B. The width of windows has been increased within Blocks B1, B2 and B3 at the Level 4 podium level. In addition, the smaller studio and 1 bed units have been replaced with wider 2 bed units at this level in order to provide better daylight penetration into living spaces. As a result of these design alterations 42% of all units proposed are dual aspect and there are no north facing single aspect units. Crucially, 98% of the tested rooms in the proposed scheme are projected to have an Average Daylight Factors (ADF) above the recommended Average Daylight Factors (ADF) of the BRE guidelines. As is outlined in the IES 'Daylight- Sunlight, Shadowing Report' submitted in support of this SHD application BRE were engaged by the applicant to review the original survey methodology and results. As a result, BRE have endorsed the survey and its findings.

Residential Density

As a result of the review carried out in response to the Opinion the number of residential units has increased from 697 (PAC proposal) to 741 units. This increase has been achieved in the following areas:

The addition of one floor level to Blocks B1, B2, B3, C1, C2, C3 and D1. This increase in height has been achieved while ensuring the quality of internal amenity spaces in the form of sunlight penetration and the shadow impact on neighbouring properties are maintained to BRE standards.

An additional six units have been achieved within Blocks B1, B2 and B3 at level 4 of Block B. These units are dual aspect and have a north west aspect with views over Connolly Station.

Residential Unit Mix

The residential unit mix has been developed in response to concerns regarding an excessive number of smaller studio and 1 bed units and whether that mix would be sustainable and meet future residential needs. The total percentage of studio and 1 bed units has been reduced from 72% to 65% of the unit total. In addition, a 'Unit Mix Rationale' was prepared and forms part of this response.

Residential Amenity

The applicant and design team has engaged with a BTR Operator to refine the range of residential amenity facilities and services within the scheme. Amenities have been consolidated at the Highline level (above ground level) within Block B and the areas previously identified for residential amenity at levels 2 and 3 have been omitted. An internal residential amenity space has been included at penthouse level within Block B2 which offers an amenity destination for residents with direct access to the roof gardens. The extent of roof gardens has also been increased with new spaces included for residents within Block C1 and Block D2.

Car Parking

The total number of car parking spaces being provided at basement level has been significantly reduced from 240 spaces proposed at the PAC meeting to the 58 spaces proposed in this application. The basement GIA has decreased in line with this change from 14,617m² to 7,253m².

Connolly Quarter is designed to be a pedestrian priority scheme. Residential car parking is non-priority given the proximity to Connolly Rail Station and other public transport connections. There are currently 390 existing car parking spaces on site for CIE use. The development agreement requires 180 spaces of these to be maintained for CIE's use. As part of the SHD submission, 135 CIE spaces are accommodated within the Block B podium deck. As was stated previously the legal opinion obtained (**Appendix 1**) states that the development agreement between the applicant and CIE acts as a burden on the site and is in effect 'a restrictive covenant' on the site. As such these 180 spaces cannot form part of the proposed development and accordingly cannot be included as a use for the purposes of calculating the extent of 'other uses'. Accordingly the proposed car parking strategy provides for a rationalising of the existing car parking arrangement on site which will result in the number of spaces reducing from 390 at present to 238 when the site is fully built out (180 for CIE use and 58 for the proposed residential development).

Ground Level Uses

Given the required reduction in basement area (as mentioned above), the ground level mix of uses has been changed accordingly. All residential waste storage areas are located at basement level whilst cycle parking areas are located adjacent to cores at both ground and basement level. The above changes have resulted in an overall reduction in 'other uses' from 3,800sq m to 3,142 sqm.

'Highline Level'

The extent of Highline within the SHD application has been reconsidered in line with concerns raised at the PAC meeting. It is proposed that the entire extent of Highline will form part of the SHD application. That part

of the 'Highline' that over sails the protected Luggage Store and Workshop buildings is 'temporary' in nature as these structures will form part of the separate Section 34 planning applications to Dublin City Council for Blocks A and E as outlined in the accompanying Masterplan Document.

2.3 Residential Support Facilities & Residents Services & Amenities

Further consideration and/or justification of the documents as they relate to future residential amenities, having particular regard to the quality, nature, quantum, size, distribution and compatibility of residential support/communal facilities and their location within the overall development. Particular regard should be had to Part (b) of SPPR 7 of the Sustainable Urban Housing, Design Standards for New Apartments 2018 and the need to provide an evidence-based assessment regarding the residential services and amenities to be provided. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

This response should be read in conjunction with Section 04 of the Architects Design Statement which outlines in detail the rationale for and quantum of residential support facilities, services and amenities proposed for Connolly Quarter.

The applicant engaged with a BTR operator to ascertain the preferences of the market for this type of accommodation, having regard to the typical profile of renters in similar urban locations. This process has informed the range and extent of facilities, services and amenities proposed to serve the future residential population of Connolly Quarter.

The proposed development incorporates a significant proportion of residential amenity spaces and residential support facilities in accordance with the Design Standards for New Apartments Guidelines (2018). The provision of communal resident services on the site are of a high quality and will make a significant contribution to quality of life for future tenants and the overall level of amenity within the proposed development. The facilities and amenities proposed have been incorporated, having regard for SPPR 7(b) of the Apartment Guidelines which state that BTR development must be;

"Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:

- (i) Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.*
- (ii) Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc"*

The Build to Rent model offers a curated living experience for the residents and wider community. It enables individuals at different life stages and income levels, to enjoy the benefits of fully managed developments with residential support services, amenities and facilities. This model offers well designed and managed apartments, amenities and communal facilities that respond to modern lifestyles and working patterns and aid in the creation of communities.

Figure 3 below includes details of the quantum of residential amenities, facilities and support services proposed at Connolly Quarter, followed a more detailed description.

Required Amenity Area	Area
Required Private Amenity (as per Apartment Guidelines)	4,003 sq.m
Required Communal Amenity (as per Apartment Guidelines)	4,003 sq.m
Total	8,006 sq.m
Proposed Amenity Area	
Private Amenity – Balconies	165 sq.m
Private Amenity – Internal Residential Amenity	1,444 sq.m
Private Amenity – Roof Gardens	2,432 sq.m
Communal Amenity – ‘High Line’	3,149 sq.m
Communal Amenity – ‘Podium Gardens’	3,072 sq.m
Total	10,253 sq.m

TABLE 1 QUANTUM OF RESIDENT AMENITY AREAS

Residential Support Facilities

Each of the residential blocks is served by independent entrances and residential lobbies. Each lobby, in turn, will connect to private and independent cycle storage facilities at ground level. The residential blocks will be served by a central concierge space which is located at the base of Block C1 and accessed directly from Connolly Quarter. This double height space shall be highly visible within the metal clad colonnade at the base of the tower and for the purposes of comparison, can be likened to that of a hotel. The resident support services to be provided at the central concierge reflect current best practice, benefitting tenants and ensuring effective management.

The central concierge will offer the following resident support services:

- Entrance Lobby & Reception Lounge
- Concierge Desk & Residential Services (all blocks)
- Management and Leasing Services
- Parcel Drop-Off (all blocks)
- Delivery Drop Off (Block C)
- Back Office
- Security
- Staff Room/Storage
- Print Room/Store

Residential Services & Amenities

An integral characteristic of the Build to Rent model is the provision of communal amenities that contribute to the creation of a shared environment where individual tenants have the opportunity to integrate. These spaces enable residents to socialise and participate in shared activities, building a sense of community and belonging.

The individual residential cores will connect directly from ground to the Highline residential amenity level. Direct access will be provided from the external Highline to gain access to the range of amenities being shared by residents.

A range of internal communal amenity spaces are to be located at the first floor Highline level, including:

- Lounges
- Gyms
- Meeting / Workspaces
- Cinema Rooms

- Function Rooms
- Shared Kitchen / Dining Space
- Games Room

The provision of these communal amenity spaces will nurture a cohesive residential community by providing opportunities for social integration. All the communal amenity spaces will be curated spaces with regular events organized by the community managers.

Figure 4 below is a schedule of resident amenity areas, including a breakdown by block. It highlights the distribution of amenity spaces throughout the scheme, ensuring all residents will have ready access to these spaces. In addition, it is noted that the communal amenity spaces and facilities provided will be available for use by all residents within the scheme and will not be confined to residents within the respective blocks.

Block	Name	Level	Area (m2)
B1	Resident's Dining Room	Block B - 01 Level	124.2
B1	Resident's Gym	Block B - 01 Level	250.6
B1	Resident's Lounge	Block B - 01 Level	65.3
B1	Residential Work Zone	Block B - 02 Level	75
B2	Residential Amenity	Block B - 14 Level	356.7
TOTAL B			871.8
C1	Resident's Work Space	Block C - 01 Level	39.8
C1	Resident's Bar and Lounge	Block C - 01 Level	194
C2	Residential Amenity	Block C - 01 Level	126.8
C3	Residential Amenity	Block C - 01 Level	153.1
C3	Resident's Yoga and Spin	Block C - 01 Level	60.6
C3	Resident's Games Room	Block C - 01 Level	72.7
TOTAL C			647
D1	Residential Amenity	Block D - 01 Level	325.5
D1	Residential Amenity	Block D - 13 Level	30.5
TOTAL D			356
GRAND TOTAL			1874.8*

**A lower figure of 1,444 sqm has been assumed in the development description to allow future flexibility of Resident Amenity Space Fit out, and full compliance with SPPR (b)ii.*

TABLE 2 BREAKDOWN BY BLOCK OF RESIDENT AMENITY SPACES

Communal open space is also proposed within the scheme, providing informal areas for residents to meet, relax and engage in leisure activities. The 'Highline' level is 3,149sq.m in area and approximately 400m long, providing an outdoor activity circuit with 'touchpoints' within garden spaces. The Highline incorporates amenity spaces for a range of activities including an outdoor gym, yoga zone and trim trail.

Block B will incorporate landscaped podium gardens that extend around each of the buildings forming an integral part of the communal open space for all residents of Connolly Quarter. These gardens total 3,072sq.m in area and are an integral aspect of the communal open space and amenity strategy for the scheme. Roof terraces for every block are also an important element of the communal open space, providing semi-private amenity spaces for the benefit of residents.

A review of BTR developments approved by the Board has been undertaken and indicates that the proposed resident services, facilities and amenity spaces at Connolly Quarter is comparable to those of other schemes, see **Table 3**.

Approved BTR Scheme	Private Amenity Space	Communal Open Space	Communal Services & Amenity Space
ABP-303358-19 Swiss Cottage Public House, Santry 110 BTR units	Private Balconies 758sq.m required 392sq.m provided *Shortfall offset by provision of communal facilities and amenity spaces	Outdoor Exercise Area Outdoor Central Courtyard Roof Terrace	Concierge Internal Reception Post Room Shared Workspace Gym / Yoga Space Lounge / Kitchen Bookable Communal Room
ABP-303435-19 Former Dulux Factory, D12 265 BTR Units	1,584sq.m required Private Balconies 1,495sq.m provided *Slight shortfall to 35 balconies - deemed not detrimental	Resident Courtyards Rooftop Terrace Semi-private plaza	Reception Games Room Business Centre Gym Media Centre Party Room Shared Kitchen Communal Lounge Bookable Guest Rooms Café (and café refuse)
ABP-304196-19 Clarehall, D17 132 BTR Units	Ground Level Recessed Amenity Space & Private Balconies	Limited Outdoor Open Space	Concierge Gym with Terrace Shared Storage & Laundry Shared Ground Floor Space
ABP-304346-19 Former Chivers Factory, Coolock 495 BTR Units	Private Balconies & Open Space	Semi-private courtyards Roof Gardens Public Open Space	Concierge Function Room Games Room Dining Area Communal Work Area Homework Club Study Hub Refuse Storage
ABP-304383-19 Concord Industrial Estate, D12 492 BTR Units	Private Balconies & Gardens *Shortfall in private amenity spaces offset by communal facilities/amenities	Internal and External Terraces Internal Courtyards Playground Area	Concierge Management Offices Maintenance & Repair Services Waste Management Facilities

TABLE 3 RESIDENT FACILITIES AND AMENITIES IN APPROVED BTR SCHEMES

2.4 Residential Amenity

Further consideration and/or justification of the documents as they relate to the provision of private amenity space associated with individual units having regard to the provisions of SPPR8 which states that flexibility shall apply in relation to the provision of a proportion of private amenity space. Further consideration is also required regarding the extent of single aspect units with the scheme and the amenities for future occupants in terms of adequate sunlight and daylight. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted at application stage.

Section 03 and 04 of the accompanying Architects Design Statement, submitted under separate cover, outlines in detail the distribution, function, categorisation and quantum of amenity space provided to serve the needs of residents within Connolly Quarter and enhance their amenity. This matter is also addressed in Section 2.3 above. In addition, a Housing Quality Audit (HQA) is submitted in support of this application.

In accordance with the provisions of SPPR 8 of the New Apartment Guidelines 2018, a total of 4,003sq.m of private amenity space is required within the scheme. Connolly Quarter incorporates private amenity spaces in the form of private balconies for some units which are supplemented by semi-private open spaces that are intended to enhance quality of life and provide spaces for relaxation and recreation.

The provisions of SPPR 8 allow for a flexible approach to the provision of private amenity space, in cognisance of the fact that not every site or development is suited to the provision of private balconies and gardens for every unit. Thus, the applicant has offset the shortfall in private balcony space by inclusion of semi-private and communal amenity spaces that will counter this shortfall and enhance amenity within the development. **Table 4** below sets out the quantum of private amenity space within the proposed development.

Amenity and Service Areas	Area Provided (m²)
Private amenity area in balconies	165
Private amenity area in internal residential amenity	1,444m
Private amenity area in roof gardens	2,423
Total Area	4,032

TABLE 4 PRIVATE AMENITY AREAS

The proposed scheme has evolved to respond to the specific conditions of the site, constraints associated with urban environments and the relevant planning policies. Notwithstanding, the importance of daylight and sunlight to a healthy environment has been a driving force in the design process and has informed the location of open spaces and communal amenities within the scheme.

Having regard to the comments of ABP following the PAC, the proposed development has been amended and no longer contains any north facing single aspect apartments. Further, the current proposal achieves 42% dual aspect apartments which is above the recommended standard. There are no single aspect north facing units proposed as part of the development.

Table 5 below shows a breakdown by block of how many units are dual aspect apartments.

Dual Aspect	
Block	Apt. Count
B1	42
B2	41
B3	41
C1	72
C2	42
C3	14
D1	44
D2	18
Total	314 (42%)

TABLE 5 NO. OF DUAL ASPECT UNITS BY BLOCK

A Daylight, Sunlight & Overshadowing Report prepared by IES and submitted under separate cover, provides a detailed analysis of these aspects of the proposed development.

Key conclusions from that report are as follows:

- The sunlight analysis showed that 68% of the amenity areas in the development will receive more than 2 hours of sunlight on March 21st and therefore the proposed development exceeds BRE recommendations.
- Average daylight analysis indicated that 98% of rooms tested within the proposed scheme will achieve projected Average Daylight Factors (ADF) above the recommendations in the BRE Guidelines. The design team consider that they have achieved a balance on window design to achieve optimum daylight factor with no adverse effect on heat loss and energy efficiency.
- Following extensive analysis, it was determined that overshadowing on surrounding properties, arising from the proposed development will be almost identical to that from the previously permitted scheme. Given the city centre location of the site and the objective to create high density development of appropriate scale for such an urban location, shadowing impacts are considered acceptable.
- Vertical sky component analysis was undertaken to ensure the proposed development exceeds the recommendations of the BRE guidelines. The analysis was completed for the existing neighbouring properties including Oriel Hall, Oriel Street Upper and St Laurence O'Toole Court House Complex. The results show that all the points tested are appropriate for a high-rise development under BRE Guidelines.

2.1 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 quantum of residential parking proposed, how it is intended that it is assigned and managed and measures proposed to address shared car parking and visitor parking.

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

Car Parking Rationale

Having regard to the concerns raised by the Board the total number of car parking spaces being provided at basement level has been significantly reduced from 240 spaces proposed at the PAC meeting to the 58 spaces proposed in this application.

Currently there are 390 car parking spaces operated by CIÉ. The development of this site is subject to an agreement that 180 of these spaces (a reduction of 210 spaces) must be maintained exclusively for the use of CIÉ. This requirement is in addition to certain access arrangements being maintained to meet CIÉ's operational needs. The proposal complies with this obligation and, in addition, it is proposed to provide spaces for the exclusive use of future residents of the SHD development.

Quantum of Residential Parking

The SHD application provides 58 residential parking spaces for 741 apartments. The spaces will be provided in the basement. This quantum represents a provision rate of 7.8% or 1 space per 12.8 apartments. The most recent CSO Census data identifies local rates of non-car ownership of 63% and, in the course of pre-planning discussions with both the National Transport Authority (NTA) and Dublin City Council (DCC), the applicants were advised that the site could be considered as an appropriate candidate for zero parking provision.

Assignment & Management of Spaces

All residential parking spaces will be Car Share spaces and will be managed by the Connolly Estate Management Company. No spaces will be assigned to individual tenants or individual apartments. Access to Car Share will be made available to Connolly Residents only on a Resident Smart Card basis. A contract will be entered into between the Connolly Estate Management Company and a Car Share provider (such as Go Car) for the provision of vehicles.

Shared Parking and Visitor Parking

All residential parking spaces will be provided on a Car Share basis. No provision is being made for visitor parking which can be accommodated on local roads and car parks

3 Statement of Response to Specific Matters

Outlined below is a response to each of the 12 no. specific items raised in the Opinion received from An Bord Pleanála on foot of the pre application consultation meeting. To avoid repetition in the application documentation, where information is contained within other supporting documentation and is relevant to the response, the reader is referred to the applicable report.

3.1 Design Rationale

The proposed development shall be accompanied by an architectural report and accompanying drawings which outlines the design rationale for the proposed building height and scale, having regard to inter alia, National and Local planning policy, the site's context and locational attributes. The report should outline the height design rationale in light of the publication of 'Urban Development and Building Height' 2018 and specifically with reference to Chapter 3 Building Height and the Development Management process, of the guidelines as well as section 16.7 of the Dublin City Development Plan.

This item has been comprehensively addressed in Section 2.2 of this response. In addition, the 'Design Assessment' prepared by Professor Ian Ritchie together with the 'Architects Design Statement' and the 'Masterplan Document' submitted under separate cover should also be referred to.

3.2 Resident Support Facilities, Services & Amenity Areas

A report which addresses the provision, both qualitative and quantitative, of resident support facilities and resident service and amenity areas within the overall scheme and on a block by block basis, having regard to both Section 5 (sections 5.1-5.12) and SPPR 7 & SPPR 8 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, March 2018.

This item has been addressed in Section 2.3 and 2.4 of this response.

3.3 Management & Operation of Build to Rent Scheme

Proposals for the management and operation of the proposed development as a 'Build-to-Rent' scheme in accordance with Specific Planning Policy Requirement No. 7 of the 2018 Guidelines on Design Standards for New Apartments, including detailed proposals for the provision and management of support facilities, services and amenities for residents. A Building Lifecycle Report in accordance with section 6.13 of the guidelines should also be submitted. The plan shall also address the management and maintenance of public spaces and access to the development.

See report 'Greystar – Input for Planning' included in **Appendix 3** to this response.

3.4 Materials & Finishes

A report that specifically addresses the proposed materials and finishes of the proposed structures including specific detailing of finishes and frontages including the maintenance of same, shopfronts and commercial units, the treatment of landscaped areas, pathways, entrances and boundary treatment/s. The treatment/screening of exposed areas of basement ramps and any podiums as well as the underside of the proposed highline structures should also be addressed. 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 overall development. The documents should also have regard to the long-term management and maintenance of the proposed development.

Please refer to Section 07 – Architectural Approach in the accompanying Architects Design Statement for further details. The following key issues have been addressed in establishing an appropriate architectural response in relation to high quality and durable finishes which include the following:

Legibility + Visual Coherence

Facades are composed in accordance with the internal rationale of the residential unit plans and are based on a carefully designed façade construction modules. Whilst there is a rich and diverse series of material approaches, it is controlled and unified by a modular strategy composed of predominantly brick masonry façade materials.

While the residential blocks above ground level create a vivid and playful interface of forms and façade materiality, the building base offers a legible and coherent solid form with the modern archways creating a shopfront and residential rhythm. The 'solid' materiality supports the industrial reference of the Highline above. Entrances to residential cores and commercial units are 'contained' within this legible façade structure and are made apparent with the use of canopies, lighting and unique material.

Visual Variety

A sequence of varied facades creates a rich and 'unfolding architectural story'. The entire visual story is not revealed from a single viewpoint with façade and building relationships being revealed as visitors move through the layered open spaces. Facades of each building have been considered in detail to deliver an overall visual variety but with detailed façade modules designed with detail, colour and textural variety. The building forms and facades are designed to create a playful and exciting interface with neighbouring buildings.

Durability

The facades are designed with materials of the highest quality in mind. Whilst there is an inherent legibility of approach between each building, the assembly of materials differs from building to building to create a subtle richness to the approach. The use of brick as the predominant façade material alongside a feature white metallic panel system (Block C1) ensures a low maintenance and durable solution.

3.5 Daylight & Sunlight

A comprehensive daylight and sunlight analysis addressing existing residential units in proximity to the site and proposed units and open spaces within the development. A comprehensive justification is required for any proposed north facing single aspect units.

Please refer to the 'Daylight – Sunlight Overshadowing' report prepared by IES and submitted under separate cover in support of this application.

Please note this proposal does not provide for any single aspect north facing units.

Having regard to the comments made by the Board, the British Research Establishment (BRE) were engaged by the applicant to review the original survey methodology and its findings. Arising from this review the survey methodology was amended to include more units. BRE have now endorsed the survey and together with its findings – see Appendix 1 to the IES Report.

The key conclusions of the report are;

- The sunlight analysis showed that 68% of the amenity areas in the development as a whole will receive more than 2 hours of sunlight on March 21st and therefore the proposed development exceeds BRE recommendations.
- Average daylight analysis indicated that 98% of rooms tested within the proposed scheme will achieve projected Average Daylight Factors (ADF) above the recommendations in the BRE Guidelines. The

design team consider that they have achieved a balance on window design to achieve optimum daylight factor with no adverse effect on heat loss and energy efficiency.

- Following extensive analysis, it was determined that overshadowing on surrounding properties, arising from the proposed development will be almost identical to that from the previously permitted scheme. Given the city centre location of the site and the objective to create high density development of appropriate scale for such an urban location, shadowing impacts are considered acceptable.

Vertical sky component analysis was undertaken to ensure the proposed development exceeds the recommendations of the BRE guidelines. The analysis was completed for the existing neighbouring properties including Oriel Hall, Oriel Street Upper and St Laurence O'Toole Court House Complex. The results show that all the points tested are appropriate for a high-rise development under BRE Guidelines.

3.6 Build-to-Rent Covenant/Legal Agreement

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, and which imposes a requirement that the development remains owned and operated by an institutional entity and that similarly no individual units are sold or rented separately. The proposed agreement shall be suitable to form the basis for an agreement under section 47 of the planning act between the Planning Authority and the owner of the site and it shall bind the owner and any successors in title for a minimum period of at least 15 years.

See attached copy of correspondence from Matheson Solicitors in **Appendix 4**.

3.7 Housing Quality Audit

A Housing Quality Assessment which provides the details regarding the proposed apartments set out in the schedule of accommodation, as well as the calculations and tables required to demonstrate the compliance of those details with the various requirements of the 2018 Guidelines on Design Standards for New Apartments including its specific planning policy requirements.

The HQA compares the residential elements of the proposed development with the provisions of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) issued by the Department of Housing, Planning and Local Government. Each of the 741 units proposed are fully compliant with these guidelines.

Apartment Mix

The mix of units for the proposed development is given below. The unit mix is in accordance with the Design Standards for New Apartments 2018. As stated in SPPR8 there is no restrictions on the mix of unit types within the development in the Build-to-Rent category. However, it should be noted that the proposed mix has been changed from that proposed with the PAC to provide for a reduction in the Studio and 1Bed units while increasing the amount of 2 Bed and 3 Bed bedroom units. The proposed development contains a total of 741 units and the unit mix is as outlined in **Table 6**.

Unit type	No. of units	Percentage of units
3-bed	6	0.8%
2-bed	251	33.7%
1-bed	256	34.7%
Studio	228	30.8%
Total	741	100%

TABLE 6 APARTMENT UNIT MIX

Apartment Floor Areas

The minimum apartment floor areas have been met within all individual unit types. In addition, the total gross floor area for all apartments exceeds the minimum and is approximately 14% greater than the required area.

The majority of the units exceed the minimum floor requirements by between approximately 10%-25%, as shown in the **Table 7**.

Unit type	No. units	Unit area required	Average unit area achieved	Largest unit type	Smallest unit type	Average unit type percentage exceedance
3-bed	6	90.00	113.19	114.65	106.90	126%
2-bed	251	73.00	84.97	107.80	78.31	116%
1-bed	256	45.00	51.57	79.09	48.40	115%
Studio	228	37.00	40.38	50.00	38.20	109%

TABLE 7 AREA ANALYSIS OF UNIT TYPES

Dual Aspect

314 of the 741 proposed apartments are dual aspect units (42.4%). This exceeds the minimum requirement set out in section 3.17 of the Design Standards for new Apartments of 33% for urban locations.

For more information please see 'Architects Design Statement' (p.54) which is submitted under separate cover.

Lift & Stair Cores

Each block contains a lift & stair core with access at the ground level to the pedestrianised streets.

Some Cores allow access to basement where a basement is beneath. All cores enable direct access for residents on to the elevated 'Highline and roof gardens'. Numbers of units per core per floor vary, however the limit of 12 units is never exceeded. By limiting the number of units per core, it enabled a larger percentage of dual aspect apartments to be provided.

Floor to Ceiling Height

Floor to ceiling heights meet the Building Regulations requirement of 2.7m in all areas of all units.

Private / Communal Amenity Space

As outlined below in **Table 8**, 4003 sqm of Private amenity space and 4003 sqm of Communal amenity space is required. A variety of Private, semi-private and communal spaces throughout the scheme create a choice

and mix of spaces which far exceed the requirements set out in Design Standards for New Apartments guidelines.

Private balconies account for a small proportion of private amenity space. The remainder is made up via Roof top terraces, Podium gardens, Decked area, Highline residents garden, internal resident amenity areas. Page 51 of the Architects Design Statement describes this approach in more detail.

Private and Communal Amenity	Area Provided (m ²)
Private amenity area in balconies	165
Private amenity area in internal residential amenity	1,444
Private amenity area in roof gardens	2,423
Communal amenity area in 'Highline' level	3,149
Communal amenity area in podium gardens	3,072
Total Area	10,253

TABLE 8 AMENITY AREA PROVISION

Storage Space

Internal storage in all apartments is equal to or greater than the minimum required in the guidance. 100% of units are fully compliant with storage requirements. The A1500 series of architect's drawings shows how this space has been designed.

Access and Services

The blocks are designed in accordance with Part M of the Building Regulations, including Universal Design which requires access design considers access for mobility impaired people.

Children's Play and Landscaping

Children's play space is encouraged throughout the communal realm. Refer to BSLARCH landscape proposal for further details.

Car Parking

Car parking provision is provided at basement level. 58 no. spaces are provided, and all car parking spaces will be managed car sharing basis. A minimum of 10% of car parking spaces will be fitted with electrical car charging apparatus and ducting will be provided to facilitate the installation of additional electrical car charging apparatus.

Please refer to the Basement floor plan for details.

Bicycle Parking

The basement contains 640 no. indoor residential bicycle storage spaces. The ground floor contains 766 no. indoor residential and visitor bicycle storage spaces. The total of 1,406 no. residential and visitor bicycle storage spaces exceeds the requirement.

Locating the bicycle storage indoors allows access to be controlled increasing residential property security.

Refuse Storage

Refuse storage areas are provided within all blocks in either the ground floor or basement levels, for both residential and retail units. The total area provided is 519sq.m and all waste storage areas will be accessible via the stair & lift cores by residential, facility staff, and retail staff. Facility staff will ensure waste storage areas are maintained in good order. Refer to operational waste management report.

Unit Design

All units are designed to exceed minimum area and dimension standards. The 1500 series architects' drawings show how this compliance is achieved.

3.8 Supporting Images & Drawings

Photomontages, cross sections, axiometric views of the scheme and CGIs. Visual impact analysis (to include views from the wider historic areas of the City including Georgian Core – north and south, Stephen's Green, Trinity College, College Green) as well views from the wider area including adjacent residential areas to indicate potential impacts on visual and residential amenities. The application should include full and complete drawings including levels and cross sections showing the relationship between the development and adjacent residential units and adjoining streets.

Please see photomontages, together with the Visual Impact Assessment Chapter of the EIAR submitted under separate cover in support of this application.

Cross sections are included in the architectural drawing suite.

A suite of images are included in the Architectural Design Statement.

3.9 Childcare Demand Analysis

Childcare demand analysis and likely demand for childcare places resulting from the proposed development, if any.

According to the applicable policy documents the threshold for childcare provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. A **Childcare Assessment Report** prepared by McCutcheon Halley Planning accompanies this application under separate cover and should be read in conjunction with this response.

Within the context of this urban location, it was deemed appropriate to audit existing childcare provision within a 1km catchment of the subject site, equitable to an approximate 15-minute walk. Given the site's location and access to public transport, this distance is deemed a reasonable catchment for future occupants of the proposed development to access childcare services.

In accordance with the Childcare Guidelines for Planning Authorities, 2001, this assessment establishes the following:

- The emerging demographic profile of the study area;
- The existing geographical distribution of childcare facilities in the study area.

According to Census 2016, the population of the study area is 53,330 which represents an increase of 9% during the intercensal period. 4.7% of the study area's population is aged 0-4 years old, this reduces to 4.1% in the North Dock C ED i.e. that ED within which the subject site is located.

The lower percentages reflect the subject site's geographical location i.e. a city centre location.

The total number of units within the proposed development is 741 no. units. Excluding the studio units (228no.) and 1 bed units (256 no.), 257no. units are 2 bed or 3 bed units and thus are suitable for families. See **Table 9** below for details:

Relevant Statistics	No. of Units Suitable for Families	257
State (2016 Census)	Average Household Size	2.7
	% of population aged 0-4 (Dublin City)	5.5%
	Q3, 2016 QNHS Childcare State Creche Uptake	19%
	Q3, 2016 QNHS Childcare Dublin Creche Uptake	25%
Proposed Development	No. of residents within proposed housing development	707
	No. of children aged 0-4 (5.5%)	39
	Q3, 2016 QNHS Childcare (State 19% utilise creche)	7
	Q3, 2016 QNHS Childcare (Dublin 25% utilise creche)	10

TABLE 9 CHILDCARE GENERATION

Utilising the State's average household size of 2.7 persons per unit, 257no. units will generate 793 no. persons. The percentage of children aged (0-4) years within the 11no. ED is 4.7% and 5.5% for Dublin City. The proposed development would therefore, theoretically, in accordance with the Dublin City average for population of children aged 0-4, yield 39 no. children.

The Quarterly National Household Survey, Childcare, Quarter 3 2016 states that the percentage of pre-school children minded by parents is 62%, meaning 38% of pre-school children attend some sort of childcare facility. The most common non-parental childcare type identified in the survey for pre-school children is a creche/Montessori/playgroup facility. This type of childcare is used by 19% of the State's pre-school age children, while the Dublin uptake is higher at 25%.

Applying the Dublin childcare uptake ratio of 25% to the proposed development, then theoretically, only 10no. childcare spaces would be required.

However, the Childcare Assessment is based on the worst-case scenario i.e. that all children aged 0-4 years would be cared for in a crèche. The assessment therefore proceeds on the basis of a requirement for 39 no. children.

15 no. childcare facilities were identified within the study area with a capacity of 675 no. and good geographical spread in relation to the proposed development site. There are a further 26 no. facilities within an approximately 20-minute walk from the proposed site location.

There are 2,515no. children aged between 0-4 within the 11no. EDs examined for this assessment, all within 1km of the subject site. Based on the data presented in the Quarterly National Household Survey, Quarter 3 2016, 25% of children in Dublin are accommodated in a creche/Montessori, thus there is a requirement for 629no. places in this catchment.

Based on the worst-case scenario, the subject site may generate an additional 39no. childcare spaces and all these spaces will be supplied by the childcare facilities within 1km or approximate 15-minute walk from the proposed development.

Thus, the existing population combined with the proposed development would generate a requirement for 668no. childcare spaces in the creche catchment area and there is presently at least 675no. places provided by the existing facilities.

In addition to the 675no. childcare spaces provided by existing childcare facilities; additional spaces will be created as a result of existing granted planning permissions in the area for developments which include childcare facilities.

The Childcare Assessment demonstrates that there is sufficient childcare capacity within 1km and a less than 15-minute walk from the proposed site to accommodate the childcare going age generated by the proposed development. Considering the proximity and capacity of existing childcare facilities, there is no need or requirement for the provision of additional childcare spaces as part of this development proposal.

3.10 Phasing Plan

Please refer to the Construction & Methodology Phasing Management Plan, prepared by O'Connor, Sutton, Cronin Consulting Engineers (OSCS) submitted under separate cover with this application. Shown below in **Figure 3**, the phasing plan indicates the development will be constructed in 6 no. phases. It will take approximately 240 no. weeks based on the planning programme and on market requirements with some phase overlap.

Construction will commence with the basement excavation and associated piling. The basement lies entirely within the area of the SHD application. Following on from the construction of the basement work will commence on the C1, C2 and C3 residential blocks followed, in turn, by the B1, B2 and B3 residential blocks alongside, and above, the realigned railway sidings. The SHD element of the development will be completed with the construction of the smaller D1 and D2 residential blocks.

The phasing plan has been developed to enable a programme of construction that responds to the constraints of this urban infill site, minimise disruption to the local community and ensure that the delivery of services and amenities meets the needs of new residents.

The proposed resident services and amenities and communal support facilities, as well as rooftop gardens will be provided in tandem with the respective residential blocks. The public open spaces will be delivered in tandem with the residential phases of development.



FIGURE 3 PROPOSED PHASING PLAN

3.11 Consents

Relevant consents to carry out works on lands which are not included within the red-line boundary.

See appendix to cover letter submitted with the planning application in relation to Letter of Consent from CIE.

3.12 Audits

A detailed Quality Audit to include Road Safety Audit, Access Audit, Cycle Audit and Walking Audit. A Mobility Management Plan.

See the accompanying reports 'Designer Response to Road Safety & Quality Audit' and 'Mobility Management Plan' prepared by O'Connor Sutton Cronin Consultant Engineers and submitted under separate cover in support of this application.

4 Notification of Statutory Bodies

We can confirm that a copy of this application including all supporting drawings and reports both in printed and electronic form have been issued to;

- 1) National Transport Authority
- 2) Transport Infrastructure Ireland
- 3) Irish Rail
- 4) Irish Aviation Authority
- 5) Dept. of Culture, Heritage and the Gaeltacht (archaeology & architectural heritage & nature conservation)
- 6) The Heritage Council
- 7) An Taisce – the National Trust for Ireland
- 8) Failte Ireland
- 9) An Comhairle Ealaíonn
- 10) Irish Water
- 11) Dublin City Council Childcare Committee
- 12) Commission for Railway Regulation

Appendix 1 Opinion of Michael O'Donnell, BL

Appendix 2 Design Assessment Prof. Ian Ritchie

Appendix 3 Greystar – Planning Input (Report by Greystar on the management of the BRT Scheme)

Appendix 4 Copy of Draft Covenant

MICHAEL O'DONNELL
Barrister at Law

**Law Library
Four Courts
Inns Quay
Dublin 7**

**Law Library Buildings
158/9 Church Street
Dublin 7**

OPINION OF COUNSEL

Re: Development of 741 Residential Units at Connolly Station Car Park, Dublin 1

1. The prospect Applicant, Oxley Holdings Limited, propose to construct 741 residential units on the Connolly Station car park. The site the subject matter of the prospective application comprises an area 2.88 hectares which is surrounded by Connolly Station to the north west and Sheriff Street to the south.
2. As the proposal to build 741 apartments (which having regard to Section 2 of the Planning & Development Act can be defined as 741 houses as a house includes part of building occupied as a dwelling and includes a flat, apartment or other dwelling within a building) the development prima facie falls within the definition of strategic housing development which provides for a fast-tracked application for 100 or more houses, and therefore falls within the provisions of Section 3(a) of the Planning & Development (Housing and Residential Tenancies) Act, 2016¹.
3. In addition to the 741 residential units, there is provision for such an application to include other uses on the land where the zoning of which facilitates such use but only *inter alia* if the area of the houses comprises not less than 85% of the gross floor space

¹ There are no less than three provisions in Section 3 and the one referred to here is the third of these.

of the proposed development and the other users cumulatively do not exceed 15 square metres gross floor space for each house in the proposed development subject to a maximum of 4,500 square metres gross floor space for such other uses in any development.

4. The development is intended to provide for 3,142 square metres of retail/commercial floor space to be provided in 10 commercial units distributed between blocks B, C and D as set out in the application documentation lodged. Additional residential and amenity services are being provided which include a residents lounge, gym, bar and dining room, work zone, games room, screening room and spin room. These amenities and services are being primarily directed to support and facilitate the residential development and are of type construed as forming part of the residential development and are not a separate use. In my opinion these types of facilities are incidental and ancillary to the residential development, and should be construed as residential and a critical part of the development proposed. This follows the judgment of Barron J. in *Dublin Corporation v The Rehabilitation Institute*, which held that any use that is ancillary or incidental to a principal use forms part of that use. In such circumstances therefore, the type of uses set out are uses which should be construed as residential use and the area occupied by these uses do not require to be aggregated for the purposes of calculating the 4,500 square metres limit provided in Section 3 of the Strategic Housing and Residential Tenancies Act, 2016 referred to at paragraph 3 above.
5. For the purposes of this Opinion therefore I am considering the commercial space in the 10 commercial units comprising an area of 3,142 square metres which are separate and distinct commercial units which will be provided independent of and separate from the proposed 741 residential units. This is a stand alone commercial use and in no way is an impediment to the Board accepting the application as it is significantly less than the area specified.
6. In such circumstances this use is clearly capable of being provided for as part of any application for strategic housing and indeed the Act provides expressly on its face for an area of 4,500 square metres gross floor space for other uses to be provided and the

figure identified in the documentation is well below the maximum quantum specified. This quantum does not in any sense preclude the Board from accepting or determining the application.

7. The second issue relates to the nature of the lands the subject matter of the application which is currently used as a car park and is described in the documentation lodged as comprising Connolly Station car park part of which is used as a commercial car park.
8. In the documentation considered it is acknowledged that the prospective Applicant has entered into an agreement with CIE/Irish Rail that a specified number of the existing car parking spaces will be maintained exclusively for the use of CIE and that certain access arrangements will also be maintained. That agreement is the nature of a restrictive covenant running with the land which the prospective Applicant is bound to and intends to comply with.
9. There is no question that the prospective Applicant intends to do anything other than comply with its obligations to the owner of the lands, and indeed it is a condition precedent to the making of an application that the owner of the lands give its consent subject to this obligation and will require to be satisfied that its rights are protected. There is no question therefore of any attempt to do other than comply with the obligations of a contractual nature made between the owner of the lands and the prospective Applicant.
10. It should however be noted that these existing arrangements do not form part of the application proposal to be made. The existing car parking is the subject of the agreement, is a valid and subsisting operation and there is no requirement that, and indeed it would be inappropriate that these arrangements be included with the application. The existing established use proposed is not included in the application nor it is necessary that it be included because the necessary authorisation to allow this activity is already in place.
11. The requirements of Section 3 relate to the development proposed and the nature of the development that sought to be approved as part of the strategic housing development procedure. The other uses referred to in Section 3(a) to (c) (i) and (ii)

relate to "other uses" sought to be approved as part of the application procedure and do not include those users which are existing, and which are not intended to be altered and the continuance of which does not require approval as part of the application procedure. The only "other uses" for the purposes of these provisions therefore are those uses which are other than residential uses and which are proposed as part of the strategic housing development and is limited to an area of 3,142 sq. m.

12. I note that the development provides for residential parking, but this is not "an other use" of a type referred to in Section 3(a)(i) and (ii) as such car parking is incidental and ancillary to the principal use namely the residential development and is intended to be provided for that use or for the "other uses" (i.e. 3,142 sq. m) that are expressly provided for.
13. I note the comments made by Dublin City Council in respect of such car parking provisions and to the comments of the Board that these proposals may need revision, but these are pure planning considerations relative to the quantum of car parking that is appropriate and whether excessive car parking has been provided. There is no conflict therefore between what is required to be provided or maintained for by the owner of the lands and the quantum of car parking sought to be provided by the prospective developer to facilitate the new Residential Development. The existing commercial car parking is a valid and subsisting use and will not and should not and does not form part of the application and is a restriction on the title that any proposal must be consistent with.
14. I note from the documentation furnished to me that the strategic housing element comprises a part only of a much larger development which ultimately will extend over the entirety of the site and will comprise a range of uses which do not fall within the Strategic Residential Development legislative provisions. These will be the subject of a separate application under Section 34 of the Planning & Development Act to Dublin City Council in the first instance. Such a procedure is not only admissible but it is critical that it should be so as for large scale urban development where there is a need to integrate both residential and commercial developments and where there is a limited of 4,500 square metres possible within the strategic housing and there must be a mechanism to provide for a mechanism to authorise the remainder of the commercial

of other development so as to ensure a properly integrated development. While it is somewhat incongruous and unsatisfactory that the entire development cannot be the subject matter of such a fast track procedure, to deny the opportunity or the facility to provide for a wider range or type of development would be completely unacceptable and inconsistent with the proper planning and sustainable development of the area as ultimately one could provide for a lucrative residential development with no consequential obligation to provide for the integrated range of facilities that the proper planning and sustainable development of an area such as this would require.

15. In my opinion therefore the approach being adopted is not only appropriate and consistent with the requirements for a valid application under the Strategic Housing provisions and consistent with the Scheme of the Strategic Housing Act but also desirable and indeed critical, and in any event is required having regard to the various European Directives and in particular Council Directive 2014/52/EU (Environmental Impact Assessment Directive) and Council Directive 92/43/EU (the Habitats Directive). It is of course necessary in considering any strategic housing development and in carrying out the Environmental Impact Assessment (that is mandatory for this type of application) that the cumulative impacts are capable of being considered. This would allow for a consideration of all of the existing proposed and existing uses including existing car parking including those (not forming part of the application) and will be nonetheless considered given the limitations imposed in the legislation and to what such an application can contain.
16. In such circumstances therefore, in my opinion, the documentation that I have seen falls within the provisions of the Strategic Housing Development provisions and in particular those limitations contained in Section 3. Subject to the application being lodged in accordance with the various provisions contained in Section 3, and having reviewed the documentation, and having carried out the necessary due diligence to ensure that the uses other than residential uses are those uses ancillary to residential use and do not exceed the maximum 4,500 square metres gross floor area or the individual calculations relevant to the residential unit to be provided, in my opinion the application amounts to a valid application for the purposes of the Strategic Housing Development provisions.

Nothing further occurs

Michael O'Donnell

MICHAEL O'DONNELL BL

10th September 2019

PROJECT CONNOLLY

Developer: Ballymore. Oxley

DESIGN ASSESSMENT by

**Professor Ian Ritchie CBE RA Dip Arch (Dist) PCL ARB RIBA RIAI MIABSE FRSA FSFE
FSHARE Hon FAIA Hon FRIAS Hon FRAM Hon MCSA Hon DPdiM Hon D Litt**

of an urban design and its architecture by Architects RKD + ARROW

Reference Material

**MASTERPLAN DOCUMENT
ABP Pre-Application Submission 15.04.2019
18135-RKD-XX-XX-RP-A-002**

**Site Visit
11th July 2019**

JULY 2019

This assessment is prepared at the request of the developer Ballymore, for An Bord Pleanála (the Planning Appeals Board), which provides an independent third party planning appeals system.

"To play our part as an independent national body in an impartial, efficient and open manner, to ensure that physical development and major infrastructure projects in Ireland respect the principles of sustainable development, including the protection of the environment."

STATEMENT OF TRUTH

I have prepared this expert assessment according to Civil Procedure Rules and accordingly, I affirm:

- a) I understand that my duty as an expert is to An Bord Pleanála and that my role is to assist them on matters within my expertise.
- b) I understand this duty overrides any obligation to the person from whom I have received my instructions and remuneration;
- c) Consequently, this expert assessment has been prepared independently and is uninfluenced by the pressures of the developers or architects;
- d) I have disclosed in this report all information that is within my knowledge and relevant to the opinions expressed in relation to my area of expertise;
- e) I have sought to assist An Bord Pleanála by providing an objective and unbiased opinion on the matters I have been instructed to consider and I have sought in this report to disclose all facts known to me as relevant, including those which might detract from my opinion;
- f) I have restricted my opinion to matters within my area of expertise.

**Professor Ian Ritchie CBE RA Dip Arch (Dist) PCL ARB RIBA RIAI MIABSE FRSA FSFE
FSHARE Hon FAIA Hon FRIAS Hon FRAM Hon MCSA Hon DPdiM Hon D Litt**

A. Qualifications and experience

Introduction

A1. I have been invited to review and assess the scheme prepared by RKD and ARROW for Ballymore, known as the Connolly Project, a mixed-use development in the north east area of Dublin adjacent to Connolly Station and bounded by Sheriff St. Lower, Commons St., Oriel St. and Seville Place.

A2. It consists of residential, office and hotel facilities over an active ground floor level which includes retail, commercial and community uses, with the latter uses extending to the first floor, upper shared podium and roof top gardens.

My organisation

A3. I am a director of Ian Ritchie Architects Ltd. (established in 1981), and formerly a founder director of Rice Francis Ritchie (RFR), a Paris based design engineering practice created with the Irish engineer, Peter Rice. Both practices were established in 1981. I left RFR in 1990 to focus on architecture, urban design and masterplanning.

A4. I lead what is considered by the profession, one of the world's most thoughtful, original and influential contemporary collaborative architectural practices. My architectural practice has won over 100 national and international awards, and created the Spire of Dublin and recently won the national competition for a new Memorial Bridge in Dublin.

Professional background

A5. I graduated in 1972 and became a registered UK architect in 1978. I have been a registered architect in France, Germany and Ireland. I am a Royal Academician and elected member of the Akademie der Künste, Honorary Visiting Professor of Architecture Liverpool University, Fellow of the Society of Façade Engineering, Emeritus Commissioner CABE and advise Backstage Trust. I lecture internationally at conferences and universities on masterplanning, urbanism, architecture, structures, light and neuroscience + architecture. I have written several books, and many international museums hold my art.

Other relevant experience

A6. In 1999 I was asked by the UK government to help set up the Commission for Architecture & the Built Environment (CABE) which replaced the Royal Fine Art Commission, where I had been a commissioner since 1995. I acted as a founder CABE Commissioner until 2001 serving as chairman of the Commission's Housing Panel, and on CABE's design review panel for two years, during which time we reviewed numerous mixed-use development proposals.

A7. Recently I was advisor to The Ove Arup Foundation, the Director of the Centre for Urban Science and Progress NYU, and to the President of Columbia University on the Manhattanville masterplan. I have chaired many international juries including the RIBA Stirling Prize, the RIAS Doolan Award, Berlin Art Prize, Czech Architecture Grand Prix and the French government's 'Nouveaux Jeunes Albums', and was a member of the World Architecture Festival Awards Super Jury in 2017.

A8. I was awarded a CBE for services to architecture in 2000, the French Academie d'Architecture Grand Silver Medal for Innovation in 2000, the Commonwealth Association of Architects Robert Matthew Award for Innovation 1994 and The Iritecna Prize for Europe 1991.

Academic qualifications

A9. Architecture Diploma (with Distinction) PCL, Registered Architect ARB, Member RIBA, Membre L'Ordre des Architectes Français, Member Society of Industrial Artists and Designers, Registered German Architect (Architektenkammer Sachsen), Fellow Royal Society of Arts, Royal Academician, Member International Association for Bridge and Structural Engineering (IABSE), Member The Royal Institute of the Architects of Ireland, Fellow Society of Façade Engineering, Member Akademie der Künste, Honorary Fellow Royal Incorporation of Architects in Scotland, Honorary Fellow American Institute of Architects, Honorary Fellow of SHARE, Honorary Fellow Royal Academy of Music, Honorary Member of Czech Society of Architects, Honorary Doctor of Literature Westminster University, Honorary Doctorate Politecnico di Milano.

B. Approach to be Assessor

B1. Following a telephone conversation in July 2019 with Peter Halpenny of Ballymore, I was asked if I would provide an independent design review of the above-mentioned scheme for the An Bord Pleanála. I accepted and was advised to liaise with David Petherbridge of RKD Architects, Director of the practice. I noted that no independent design review had been undertaken in respect of the project. RKD forwarded the Masterplan Document which I studied before visiting the site.

B2. I had not met the architect David Petherbridge before, but had met David Browne, current President of the RIAI and also a director of RKD, at the OPW / RIAI Memorial Bridge competition announcement and exhibition in 2019.

B3. I met David Petherbridge and his colleagues Paul Davey and James Hirstle along with Ulrik Raysse, Director of Arrow Architects on 11th July at the project site. My practice collaborated with Ulrik Raysse when he was Design Director at Henning Larson Architects, Denmark, on a potential office scheme in Dublin in 2007.

B4. I was happy to undertake this design review and assessment for the following reasons:

- The proposal is for an urban scale residential-led architecture by RKD, a highly reputable architectural practice, collaborating with a Danish practice, Arrow established in 2012 by a good design architect whom I knew.
- The site is highly appropriate for a development of the sort proposed because of its proximity to convenient transport links.
- It is a matter of Dublin City policy that as much housing as possible be developed, given the actual shortage in the city and in the foreseeable future.
- The existing railway-land site would benefit greatly from a good mixed-use development with good access, amenity and the encouragement of natural habitat.

C. Wider considerations of Dublin's changing character

C1. The character of Dublin changed fundamentally with the Celtic Tiger growth, and the subsequent renaissance of the Docklands in the last few years after the 2008 financial crash.

C2. The thrust of policy has been to promote growth in identified areas; to expand housing supply; and to provide more 'affordable' housing as part of that process.

C3. In respect of housing development, there is wide acknowledgement in both city-wide and national policies that this should take place in locations that are appropriate because of their transport connections.

C4. The increasing value of central Dublin locations, and the difficulties in delivering mass housing on a 19th or mid-20th century model, have meant that there is more pressure in respect of housing provision to increase density.

C5. Densification is not the same thing as tall buildings, but there is a clear tendency towards taller, if not tall buildings. In respect of skyline policies, the city would reasonably expect to decide what they think is appropriate, especially in growth zones.

C6. However, there is also an assumption, based on historic and recent precedent, that there are models of dense medium-rise development, for example mansion blocks, that have a distinctive character at between six and ten storeys.

C7. In the 20th century it was common for denser residential accommodation to be built immediately next to or above rail and other transport stations.

C8. In the 21st century, in the context of enhanced transport provision, those levels of density are prompting housebuilders to re-think where locations will work for significant housing development, particularly affordable homes.

C9. This will inevitably affect outer areas of the city which have appropriate sites for development because of the transport connections which created their current character as commuter hubs.

C10. The scale and density of 'New Dublin' is a consequence of increased demand because of population growth, immigration, and necessary to ensure sustainable economic growth. There are likely to be issues associated with the financing of central Dublin development for low or medium-value homes.

C11. The implication on the supply of affordable homes in Dublin's central areas with developer-only-led provision will impact negatively future numbers.

C12. I understand that housing policy demands only 10% affordable units in private residential development. This will have to change if numbers are to meet demand.

D. How the proposal fits emerging character

D1. This mixed-use residential led proposal can be seen as part of a long line of precedents for residential buildings next to railway stations. Characteristics include mansion or linear forms and occasionally point or slab blocks; some uses at ground level, provision of some landscaped elements.

D2. These developments are invariably denser than ‘traditional’ house and garden typologies.

D3. There is an assumption that visual amenity can be provided each way: that is to say residents and visitors enjoy views *out*; anyone can enjoy views *of*.

D4. These are characteristics that have informed the current proposal.

D5. This is a well-scaled development, with a focus on the central tall building. This central tall building is the urban marker of the scheme.

D6. The form mitigates against the potential for over-long elevations.

D7. Materials are either contemporary without being deliberately shocking, or traditional but used in a contemporary design way.

E. The design and urban quality of the Connolly Project proposal

E1.1 I have assessed the proposal, in the first instance, in light of the provisions of the National Planning Framework 2040, which recognises Dublin’s ongoing key role. It supports:

E1.2 “The future growth and success of Dublin as Ireland’s leading global city of scale, by better managing Dublin’s growth to ensure that more of it can be accommodated within and close to the city.”

E1.3 “Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.”

E1.4 “Addressing infrastructural bottlenecks, improving citizens’ quality of life and increasing housing supply in the right locations.”

National Policy Objective 3b:

E1.5 “Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, *within* their existing built-up footprints.”

E1.6 “Making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.”

E1.7 While Dublin has generally performed well in recent years, key challenges relate to housing affordability, transport and urban amenities/liveability. Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. Dublin also needs to become a greener, more environmentally sustainable city in line with international competitors. At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well-designed higher density development. (p36)

E1.8 Dublin’s continued performance is critical to Ireland’s competitiveness. Improving the strategic infrastructure required to sustain growth will be a key priority as part of the Metropolitan Area Strategic Plan (MASP) and will include enhanced airport and port access and capacity, expansion and improvement of the bus, DART and Luas/Metro networks. (p36)

E1.9 There is no doubt that the Connolly Project meets the objectives of the National Policy Objective 3a and the general objectives for Dublin.

E2 Making Stronger Urban Places

E2.1 My comments on the proposed design, *in italics*, relate to the provisions in the Framework.

National Policy Objective 4

E2.2 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.

E2.3 The design of this scheme has the hallmarks of being an attractive place to live, to work and to visit. It is structured vertically to be open to the public at ground level, to provide semi-private community facilities at the first floor - ‘the Corten® promenade’ and with private shared landscaped gardens at upper and roof levels.

E2.4 This proposal, like any residential development is for the long term, would be expected to last at least a lifetime. It is not a speculative commercial development which could well be replaced after 20 to 30 years. The care and attention given to the strategic design of the proposal ensures that it will function well, and that its contribution to the area will be established both by the quality of the design and the scale of investment.

E3 National Policy Objective 5

E3.1 Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity

E3.2 It is clear that Dublin is the central driver of the Irish economy, and this is recognised in the NPF 2040.

E3.3 Dublin Docklands is now a world-class city quarter and paragon of sustainable inner-city regeneration that continues to make a major contribution to the social and economic prosperity of Dublin and Ireland as a whole. (NPF p56)

E3.4 The Connolly Project is close to the north docklands and canal area and responds well to this by providing a substantial number of homes in a mixed-use development that should attract both local and international business visitors as well as citizens of Dublin.

E4 National Policy Objective 6

E4.1 Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

E4.2 Response to context is intrinsic to the architectural proposition, which is scaled and planned in order to make the most of the site while respecting its environs. This includes responding to heritage and the bordering existing urban scale. This the project achieves successfully.

E4.3 The innovation evident in the proposal is not a quest for novelty, instead deriving from a design strategy which uses contrast, diversity and density in ways that are recognisably urban.

E4.4 This architecture is not trying to be pretty or 'iconic' in a 'look-at-me' sense. It is elegant and appropriately robust in its context and might be regarded as a sculptural contribution to the urban landscape. The design does set out to make an identifiable mark on the Dublin skyline. The landscape contribution of the new publicly accessible pedestrian courtyards and streets is highly significant.

E4.5 The design works as a balancing act between modest scales and uses, between respecting context while expressing the new, and by reinvigorating and raising the aspiration to improve the environmental and design standards of its surroundings.

E5 National Policy Objective 27

E5.1 Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

E5.2 There is a contractual obligation to provide Irish Rail with 180 car spaces. At present there are 320 open air spaces on a built-up grade level. Nevertheless, the number of residential units is 741 and thus this project has clearly prioritised walking and cycling, and future small individual vehicles e.g. electric scooters. There are several community spaces at the first floor which are identified for community uses and suitable activities for all ages. However, there is a need to show where child play equipment, interior and exterior gym facilities and elderly club spaces might be placed.

E6 National Policy Objective 28

E6.1 Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

E6.2 This project has set out to create an inclusive and sustainable design. The fact that it has a balance of approximately 60:40 % residential to other uses, and a fully accessible public landscaped ground level with retail and other activities strongly suggests that it will deliver a successful inclusive scheme.

E7 National Policy Objective 30

E7.1 Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

E7.2 There are several community spaces at the first floor which are identified for community uses and suitable activities for all ages. However, there is a need to show where specific elderly club spaces might be placed. There are significant areas of semi-private landscape which can be defined/allocated in part to the elderly.

E7.3 “As more people live longer lives, they will want to stay healthy and independent, live in their own homes and communities.” (p86)
The convenience of local retail and other facilities will help the elderly feel able to remain in the community.

E7.4 A well-designed lifetime residential accommodation will help Dublin achieve a balanced community, and enable those that choose to downsize, to do so. This will become apparent later with the more detailed design. Crucially, storage is important to deliver this, as the elderly often wish to keep their possessions. This should be considered at the next design stage.

E8 National Policy Objective 33

E8.1 Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

E8.2 ...be delivered in our cities and larger towns (where large scale housing demand exists), where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run.
(p92)

E8.3 *The Connolly Project clearly meets this policy objective.*

E9 National Policy Objective 34

E9.1 Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

E9.2 (p93) Well designed and located higher density housing will assist:
Fast-growing urban areas to achieve much needed scale;
Medium-sized urban areas to find a route to quality in a new competitive framework;
All urban areas to increase vibrancy and vitality;
Increased efficiency and sustainability in the use of energy and public infrastructure

E9.3 The scheme has a large number of homes. The detailed schedule in the Masterplanning report shows that the individual units have generally larger areas than standard requirements, and that asked by the brief, which suggests that achieving lifetime homes is feasible for the majority, if not all apartments. On the negative side there are no private balconies, but compensated by a generous provision of shared podium and roof gardens. These shared gardens need to be carefully designed for the short and long-term to ensure privacy for the apartments at the garden level, and to integrate the various demands they will need to serve. The orientation of some of the apartments which face north east, with daylight levels (Vertical Sky Component) meeting the required standard would benefit from splayed windows to allow afternoon sunlight to enter. One argument against balconies is that rooms below them suffer from loss of daylight.

E10 National Policy Objective 35

E10.1 Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights

E10.2 *This project is a regeneration scheme and it has exploited its location with increased building heights.*

F Design Qualities that should be achieved at this stage:

F1. Be visually attractive and imaginative to look at as a result of good architecture, layout and appropriate and effective landscaping plans.

F2. *The scheme makes a good attempt to deliver a visually attractive scheme though diversity - of forms, heights, façade rhythms, proportions, materials, open spaces and landscape while retaining and integrating heritage elements. There is perhaps a sense of a collage of competing facades - colour, vertical and horizontal and square - which could be a little calmer without losing diversity. This is especially true of the two office buildings and the hotel, which might be adjusted to reflect their solar orientation.*

From a distance and close by at ground level this scheme will enhance the city.

F3. Establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive place to live, work and visit

F4. *The proposal establishes character, rather than diluting or eliminating it. Its design integrity means it will hold its own whatever might be permitted around it in the future; indeed, its scale could be used as a template for high-quality future development which is inevitable in the area, although it is highly site-specific. It should be a comfortable place to live and to visit.*

F5. Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.

F6. *This paragraph could work as a description of what is being proposed.*

F7. Positively contribute to the existing street scene and/ or landscape . . .

F8. *This is certainly the case here.*

F9. Space about buildings should provide opportunities to create attractive settings with hard or soft landscaping (including enhanced biodiversity)

F10. *The scheme develops good urban spaces which benefit from good sun and daylight both within and without the development. There needs to be further development of biodiversity and natural habitats at the next stage.*

F11. The relationship with existing buildings should allow for adequate daylight and sunlight to penetrate in and between buildings.

F12. The site of this scheme is complex, with a railway and depot buildings to the west, and 1980s fairly mundane offices to the south with a dreadful street level edge (which should be re-developed), and with predominantly housing to the east and north. The scheme creatively deals with this complexity well and achieves a good result.

F13. The current housing demand in Dublin leans towards a higher number of single bed apartments (studio or 1 bed) and this limits the potential for dual aspect for both views and ventilation. Recognising the need to provide accommodation which will be climate resilient places a serious demand upon architects to be creative in achieving the best design outcomes. (Please also refer back to E9.3).

G1 Commission for Architecture & the Built Environment (CABE) Assessment

I have also chosen to assess the proposed development against design criteria established by CABE of which I was a founding Commissioner.

My comments *in italics*.

G2. Order. Order can manifest itself through symmetry (or asymmetry) and balance; through repetition of organisational or structural elements such as the grid, the frame or the bay; and through resonance between elements of different scales.

G3. The design concept sets out to achieve diversity. As a result, there are many different façade types, although each building has its own integrity with respect to order.

G4. Clarity of organisation. If the organisation of the plan and section are clear, then much else about a project will fall into place.

G5. The body of the work of this Irish practice achieves clarity of design, and this project is no exception. It is evident throughout, whether expressed through plans or images. It is only the question of single aspect dwellings that is of concern.

G6. Expression and representation. A building's appearance can tell us something about what purpose it serves; about its place in the order of the town or city; about how it is organised and put together.

G7. There is evidence of thoughtful approaches to each of the building's forms - residential, offices and hotel - and to the resulting holistic approach that the scheme develops. These elements are what informs the architecture of the project, and it is one of diversity - a composition that seeks to avoid oversized buildings or blocks and achieves a high degree of success in its self-imposed ambition.

G8. Appropriateness of architectural ambition. Architecture can be too noisy or too quiet. There are places for fireworks and places for modesty within the built environment - in relation both to a project's context and to its purpose and status.

G9. The ambition is high, but the scale and nature of the project is one that will become more familiar to Dubliners. It is not an overtly expressive scheme.

G10. Integrity and honesty. Is what you see what you get? If so, the plans, sections, elevations and details will all visibly relate to each other and build up to a coherent picture of the design.

G11. This is a good example of an urbanism and architecture with intent to respond with integrity to a challenging brief, and it's difficult and complex site.

G12. Architectural language. The design of a building will involve choices about matters such as whether to express it primarily as a wall or as a frame structure, about patterns of solid and void and light and shade, and so on. In a good design, such choices will seem compelling and inevitable.

G13. This is a good example of exactly what is described in respect of its variegated forms, balance between horizontal and vertical elements in the different buildings and use of different materials.

G14. Conformity and contrast. A good designer will consider the relationship of a design to its context. This is not to imply that one of the aims of a design should necessarily be to 'fit in'; at its worst, this can be little more than an excuse for mediocrity.

G15. In terms of scale and materials this proposal is very much of its site; it fits in because it makes a distinctive contribution to a much wider cityscape, will hold its own in a context that has been subject to change, and will change further.

G16. Orientation, prospect and aspect. A building's orientation should take into account the implications for energy use as well as urban design issues. In relation to prospect and aspect, the design should consider what happens at different times of day and night and at different times of the year. The view from the window, and opportunities to see the sky and weather, are as important in buildings such as offices and hospitals as they are in dwellings.

G17. This is particularly important in designing apartment blocks. The architect has responded in a way which will maximise the numbers of apartments and the economy of construction. (Please also refer back to E9.3).

G18. Detailing and materials. The quality of the plans, sections and elevations should be carried through to the level of detail - it is disappointing to see a promising project fail because of the lack of refinement in the detailing.

G19. The detailing of this project so far expressed will be high-quality, on the basis of what the architect is proposing as drawn, by reference to the previous work of the practice, and on the basis of what an exacting client would expect.

G20. Structure, environmental services and energy use. In a building of any complexity, these aspects of the project need to be taken forward as an integral part of the scheme design from the beginning. In a well-designed project, it is likely that the strategies for dealing with these aspects of the design will be apparent from the plans, sections and elevations.

G21. This appears to have been considered but it is not easy to determine to what degree. It is important that energy and sustainability strategies are considered further and in detail, and with the client's support incorporated throughout.

G22. Flexibility and adaptability. The purposes for which a building and parts of a building will be used are likely to change over its lifetime. The technologies it contains will change as well. A good design will be flexible (able to accommodate changing requirements without major alterations) and adaptable (capable of being altered or extended conveniently where necessary).

G23. The nature of this project means that its long-term use is likely to be the same as in the short term, that is to say as housing and offices. It would appear straightforward to reconfigure the hotel for further residential use in the future were that to become necessary.

G24. Sustainability. Taken in the round, a project should use natural resources responsibly.

G25. This is fully understood. A key factor will be the likely longevity of this project, which could easily exceed a century.

G26. A final point. Finally, we should not be afraid to ask about a building: is it beautiful? If it is, then the resulting lifting of the spirits will be as valuable a contribution to public well-being as dealing successfully with the functional requirements of the building's programme.

G27. This piece of architecture should lift the spirits because it will be an example of distinctive design. It will be an instant local landmark. Although it will be seen to be modest in scale, along with its white central building at a height of 79m, it will have very positive presence in relation to its entirely regenerated urban site.

H. The CABA document also sets out key questions to determine its quality. My observations are set out *in italics*.

Key questions

- Will/does the accommodation proposed meet the functional needs of the brief?
Yes, as is evident from the delivery of a programme for what is a very special site.
- Is it likely/evident that the building's users - of all kinds - will be satisfied with the design?
Yes, since the housing units are generally well-designed and the landscaped squares and spaces will be a huge enhancement.
- Will/does the design enhance the efficiency of the operations to be contained in the building?
That is the design raison d'être for the project.

- Can a stranger or visitor find the entrance and then find their way around the building? Is orientation clear enough not to need signs or maps?
The resultant straightforward site plan was developed from a difficult urban context, and changing brief, and the project should require minimal signage.
- Are the plans, sections, elevations and details all of a piece, visibly related to each other and to underlying design ideas?
Yes.
- Does the design demonstrate that thinking about the requirements of the building's structure and construction and environmental services has been an integral part of the design process? Is there evidence that the different design disciplines are working/worked as a team?
Amply demonstrated by the design strategy.
- Will the building be easy to adapt or extend when the requirements of the building's users change? Are the floorplates suitable for other uses in the future?
Not impossible, though the history of the residential and office building types make it more likely that they will remain the same.
- Does the design take into account whole-life costs?
Not least because of its likely longevity.
- What will/does the project look like in different conditions: in sun and rain; at night; over the seasons? Will it age gracefully?
The character and strength of the design should shine through, notably through the significant public landscapes.
- Can one imagine the building becoming a cherished part of its setting?
This could easily be envisaged as a cherished development in a few decades' time. The setting it will establish will make it immediately memorable and attractive.

Ian Ritchie

July 2019


130819

Greystar – Input for Planning

Prepared by:
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Index:

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 - b. Facilities
 - c. Residents
 - d. BTS vs BTR

2. How does a PRS scheme operate and run? (This should be how the Connolly scheme will broadly operate)
 - a. Overview
 - b. Security
 - c. Waste
 - d. Resident Communications
 - e. Post & Deliveries
 - f. Local Community

1. Overview of a PRS scheme – with references of how it could be operated on Connolly.

- a) *Please provide a detailed overview of the PRS structure and what a PRS scheme is. Please use best in class examples and include reference Greystar schemes where applicable.*

A PRS structure is a collection of units developed with the exclusive aim of renting to its residents. Often managed by the owner (Greystar in the case of [Greenford Quay](#)), or third party management agent (Greystar in the case of [Sutton Point](#)), typical offerings of a high-end PRS development include:

- Amenity areas: gymnasiums, private cinemas, resident lounges, co-working areas, onsite meeting rooms, or in the case of Greystar's upcoming development, [Nine Elms](#), a swimming pool.
- 24hr presence: onsite staff during the day and security overnight
- Exclusive events available to residents
- Intelligent parcel management
- Reactive maintenance from a dedicated onsite team
- Pet-friendly renting models

- b) *Facilities unique to a PRS scheme which are to be used on Connolly: Please expand on the following:*

i. *Details of the range of amenities proposed on Connolly*

Connolly have allocated space on the development for the amenities described above, and the nature of these spaces will be elaborated further in the design process (this will feature market research into the 'ideal amenity' for prospective residents) Greystar will factor in the needs of the local community in the design and operation of the scheme.

ii. *How popular and successful have these been on other similar schemes*

Across our PRS schemes we have witnessed keen uptake of amenity areas by our residents. At Greystar's Canary Wharf development, Sailmakers, residents can often be found working in communal areas, and enjoying catered film screenings organised by our events team, held in the private cinema. This cinema is also available for residents to book.

iii. *How are these managed*

Spaces available 24/7 to residents and their visitors. Residents can book specific rooms for personal events through a booking system. All amenity areas are cleaned as part of our Common Area Cleaning contract, ensuring they are kept to a high standard of hygiene and attractiveness at all times for

our residents to enjoy. All equipment including life safety systems are covered under a maintenance contract, and appliances are checked regularly by in-house maintenance staff.

iv. How do residents access amenities & Facilities – membership?

All amenities, including the gym, are accessible to residents as part of their tenancy agreement. The idea of our amenity spaces is to cultivate a community among our residents and offer a better quality of life.

a) Who are the typical residents:

Please expand on the following:

i. The typical resident of a PRS scheme. This should also include details on the proposed apartment mix and what they are targeted for

Usually the main resident groups tend to depend on the location of the actual asset however, across the MF assets which have/are going through lease up in and close to London we see two main demographics: professionals working in the city; very often in the financial sector – average age ca. 36 – 40 years and Students: average age 22. Due to a mainly single occupancy amongst the professionals, 1 beds are the most sought after apartment types. Students tend to share with one more flatmate and therefore might also be interested in a two bedroom apartment.

ii. Do residents move up and down apartment size as their requirements change – if so can you provide evidence (this demonstrates the sustainable lifecycle of the scheme)

Our apartments range from studios to 3 or 4 bed properties and as residents expand their family units they organically grow within the building and move around. At [Sailmakers](#) for example, we see the requests mainly at the renewal point after the first 12 months

iii. Provide details of comparable schemes which have successfully worked in large city centre locations.

It is hard to compare as all PRS operators employ slightly different models but some examples are:

- [Fizzy Living](#)
- [The collective](#)
- [Tipi](#)
- [Embassy Gardens](#)
- [Pan Peninsula](#)
- [Platform](#)

2. Operation of a PRS scheme

- a) *Please provide a detailed overview of how a PRS scheme operates. Please use best in class examples and include Greystar reference schemes where applicable.*

PRS is purely rented accommodation catered for anyone ranging from students, to professionals and families. By including amenity spaces, commercial units and residential accommodation we encourage an area where people can live and work and are party of a community.

A typical site will tend to have a Community Manager, Leasing Manager, Customer Service Associate, Facilities Manager, housekeeping, overnight security and on bigger developments an Events Manager. All these roles will be designed to support the needs of the resident from the day they attend a viewing for an apartment to the day they hand the keys back.

- b) *Security:*

- i. *How is security managed on the scheme and who is responsible for it*

Security of PRS sites is outsourced to security guard companies, ensuring there is always a representative onsite throughout the night to patrol the premises, and to help residents with access issues or any other issues they may have. All security contracts negotiated by Greystar require all guards to hold SIA licenses and to undergo at least one unexpected visit from a supervisor to check conduct.

- ii. *How are residents granted access to the development*

Residents gain access either by fob or key card via readers installed around the site, this access control system is also maintained under a PPM contract. Reception teams can issue and reprogram key cards on site.

- iii. *How do visitors / guests access the development*

Visitors can be granted access by residents via an access control system at a gate or an entrance.

Our sites also have an iPad or resident visitor sign in log which helps know who is in the building should an emergency arise such as a fire alarm activation.

- c) *Waste:*

- iv. *How is waste management dealt with*

At planning stage of each PRS development, waste management is strategized with sustainability, health and safety and efficiency as key

targets. This includes maximising available storage space for waste containers and negotiating with local councils/ third party waste collection companies to establish optimal collection schedules.

v. *How are Collections managed*

Contracts are executed with chosen service providers, and requisite **access** to the development are granted. In some cases the vendor will simply collect and empty the containers directly from the bin store. On developments featuring multiple waste stores, an operational process is put in place where maintenance staff will wheel the containers to a designated collection point.

vi. *How is waste storage managed*

The waste stores are typically divided by waste type so as to prevent contamination of DMR. They are kept clean as part of the Common Area Cleaning contract, or in some cases cleaning of the waste store is included in the collection contract.

d) *Resident communications*

vii. *How is communication with residents managed*

Whereas previously communication was managed solely via email or personal contact; Greystar has also recently adopted Yardi's RentCafe through which residents can report maintenance issues and view a summary of their tenancy.

Greystar also have digital screens in their reception areas which communicate upcoming events, advise residents of planned fire alarm test etc.

viii. *Are there residents forums operated by Greystar to approach communication*

There are feedback mechanism in place at sites.

Our newer buildings such as Greenford Quay aiming to set up resident forums due to size of the development and the clear need for this.

e) *Post & Deliveries*

ix. *How is post managed*

Couriers are either granted fob access to post areas or they are signed in at reception. General post is delivered to resident letterboxes.

Most of Greystar's recent UK PRS developments feature a unique, automated [parcel management system](#).

x. *How are bulky deliveries managed (residents moving in / out)*

Greystar's PRS schemes are mostly furnished, so bulky deliveries are not a regular issue. Where bulky items are collected or delivered, residents coordinate this with the onsite team who will ensure the items are stored/collected safely in/ from a secure and designated bulky waste area.

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Our ref
SAS/665502/44

Your ref

15 August 2019

Dear Sirs

**Our Clients: Oxley Holdings (the "Applicant")
Planning Application "Build to Rent" SHD Housing Development, Dublin 1**

Dear Sirs,

We confirm that we act on behalf of the Applicant. We are instructed to confirm to you that the Applicant shall execute a Deed of Covenant or enter into a legally binding Agreement with the Planning Authority to comply with all Planning Conditions attached to the Grant of Planning Permission relating to the "Build To Rent" SHD Development at Connolly Site, Dublin 1. This Deed of Covenant/Legal Agreement shall provide, inter alia:

1. that the Development shall be owned and operated by an Institutional Entity for a minimum period of not less than 15 years after the completion of the Development;
2. that during that 15 year period no individual residential units be sold or rented separately; and
3. that the Institutional Entity shall abide by all conditions attached to any Grant of Permission by the consenting Authority.

Under the Deed of Covenant/Legal Agreement the Applicant shall be obliged to ensure that the terms thereof are fully complied with by the Institutional Entity and shall, if so requested by the Planning

Managing Partner: Michael Jackson - Chairman: Tim Scanlon - Partners: Brian Buggy, Helen Kelly, Sharon Daly, Ruth Hunter, Tony O'Grady, Páircé Madigan, Tara Doyle, Anne-Marie Bohan, Patrick Spicer, Turlough Galvin, Patrick Molloy, George Brady, Robert O'Shea, Joseph Beashel, Dualta Counihan, Deirdre Dunne, Fergus Bolster, Christian Donagh, Bryan Dunne, Shane Hogan, Peter O'Brien, Thomas Hayes, Nicola Dunleavy, Julie Murphy-O'Connor, Mark O'Sullivan, Brian Doran, John Gill, Joe Duffy, Pat English, Shay Lydon, Aidan Fahy, Niamh Counihan, Gerry Thornton, Liam Collins, Darren Maher, Michael Byrne, Philip Lovegrove, Rebecca Ryan, Catherine O'Meara, Elizabeth Grace, Deirdre Cummins, Alan Keating, Peter McKeever, Alma Campion, Brendan Colgan, Garret Farrelly, Michael Finn, Rhona Henry, April McClements, Gráinne Dever, Oisín McClenaghan, Rory McPhillips, Niall Pelly, Michelle Ridge, Sally-Anne Stone, Matthew Broadstock, Emma Doherty, Leonie Dunne, Stuart Kennedy, Brian McCloskey, Madeline McDonnell, Claire McLoughlin, Barry O'Connor, Donal O'Donovan, Karen Reynolds, Kevin Smith, Ciaran Healy, Chris Bollard, Deirdre Kilroy, Michael Hastings, Maria Kennedy, Barry McGettrick, Kate McKenna, Donal O'Byrne, David O'Mahony, Russell Rochford, Liam Flynn, Gráinne Callanan, Geraldine Carr, Brian Doohan, Richard Kelly, Niamh Maher, Yvonne McWeeney, Mairéad Ní Ghabháin, Padraic Roche, Vahan Tchakian, Kieran Trent. - Tax Principals: Greg Lockhart, Catherine Galvin, Anne Harvey.
- Tax Department Chair: John Ryan. - Of Counsel: Chris Quinn, Liam Quirke.

Authority, ensure that the Institutional Entity enter into a direct Covenant with the Planning Authority to comply with the terms thereof.

Yours sincerely

Sent by email, bears no signature

MATHESON
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