

Planning Report

Proposed Alterations to a Permitted Residential Development at the Former Chivers Factory, Coolock Drive, Coolock

November 2019



Prepared on behalf of
Platinum Land Ltd

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1. Introduction

This Planning Statement has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Platinum Land Limited under Section 146B of the Planning and Development Act 2000 (as amended) for proposed alterations to a permitted residential development at the Former Chivers Factory Site, Coolock Drive, Coolock, Dublin.

The proposed alterations relate to a permitted Strategic Housing Development (SHD) comprising demolition of all buildings on site and construction of a Build to Rent scheme consisting of 495 no. apartments (61 no. studio, 150 no. 1 bed, 178 no. 2 bed and 106 no. 3 bed units) in 4 no. blocks above a basement car park, resident services and amenity spaces, a service building containing a creche, café and gym, as well as public and communal open space.

The SHD application was granted permission by An Bord Pleanála (ABP Ref. 304346) on 13 August 2019, subject to conditions. Condition No. 4 requires amendment to the approved plans involving a reduction in height of the 10 storey elements in Blocks A1 and A2 to 8-storeys and 9 storeys respectively, resulting in a total of 471 no. units. Full details are included in Section 3 of this report wherein further information regarding the parent permission is provided.

The modifications proposed to the approved scheme will not involve changes to the block layout or buildings envelope and are summarised as follows:

- Changes to the tower elements within Blocks A1 and A2 from 4 towers of 10 storeys each, to a stepped arrangement going from 10 to 8 on both A1 and A2 from east to west;
- Raised courtyard gardens at first floor level in Blocks B and C are to be dropped down to ground level;
- Omission of the stair cores in Blocks B and C resulting in amendment to the internal layouts; and
- Increasing the number of apartments from the total of 471 no. approved under the granted scheme to 550 no. units.

The purpose of this report is to provide An Bord Pleanála with an overview of the planning case, including a rationale for the proposed alterations. The proposed amendments have been assessed with regard to the relevant environmental and planning policies and aim to address matters raised by the Board in its assessment of the permitted development.

This Planning Report is accompanied by additional documents to assist the Board in its decision-making process, including:

- Architectural Drawings prepared by PLUS Architecture Ltd;
- Architectural Design Statement prepared by PLUS Architecture;
- Accommodation Schedule and HQA prepared by PLUS Architecture;
- Landscape Drawings prepared by Mitchell & Associates;
- Landscape Report prepared by Mitchell & Associates;
- Engineering Drawings prepared by CORA
- Engineering Services Report prepared by CORA;
- Traffic and Transport Assessment prepared by AECOM;
- Natura Impact Statement prepared by Altemar;
- Daylight, Sunlight and Overshadowing Assessment prepared by Metec Consulting Engineers;
- Construction and Environmental Management Plan prepared by Altemar;
- CGI's prepared by Edit (see Section 10 of the Architectural Design Statement); and
- Environmental Impact Assessment Report.

A full schedule of drawings and supporting documentation is included with the cover letter submitted with this application. This report provides details of the proposed alterations including an assessment with the relevant national and local planning policies and is structured as follows:

1. Introduction
2. Site Context and Description
3. Parent Permission
4. The Proposed Alterations
5. Assessment of the Proposed Alterations
6. Conclusion

2. Site Context and Description

The subject site (i.e. the land included in the planning application red line boundary) remains unchanged from the previous application and is located at Coolock Drive, Coolock, Dublin. The total area of the site is shown in **Figure 1** and comprises c. 3.86 hectares (ha). The application site is split into two parts, namely the Former Chivers Factory site and land beyond this within the ownership of Dublin City Council. The current proposal for alterations to the approved plans relates only to that part of the site identified as the former Chivers Factory site.



FIGURE 1- SITE LOCATION

The subject site is occupied by the disused former Chivers factory buildings, chimney stack and hardstanding areas. Vehicular access is provided from Coolock Drive and the land is bound by a palisade fence on all its borders, with sporadically located mature trees and shrubs along its northern, western and southern boundaries. Greencastle Road runs from east to west in parallel with the northern boundary, whilst Coolock Drive runs north to south, parallel with the site's western boundary.

The application area which is intended to be developed for residential purposes and supporting amenities is 3.61ha. It is located within a predominantly residential area, with two-storey housing to the west and north. The closest housing to the site is located on the opposite side of Coolock Drive to the west, c.28m from the site boundary.

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

It is noted that that part of the overall site area situated c. 220m to the south of the former Chivers Factory site, at the junction of Coolock Drive and Oscar Traynor Road (0.25ha) shall not be impacted by the proposed alterations and is intended to be upgraded in accordance with the parent permission.

3. Parent Permission

On the 30th April 2019, McCutcheon Halley Planning on behalf of the applicant, Platinum Land Limited, lodged an application for permission under Section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (ABP Ref. 304346-19).

The proposed development comprised a Strategic Housing Development (SHD) involving a Build to Rent (BTR) scheme at the Former Chivers Factory, Coolock Drive, Coolock, Dublin 17.

The development description for the permitted SHD application is as follows:

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

The development will consist of:

- a) *Phase 1 includes the demolition of all existing buildings, existing boundary fences, removal of existing trees, breaking up and crushing the existing hard standing area, excavation and all associated site works;*
- b) *Phase 2 includes the development of a basement, measuring c. 11,707 square metres to accommodate 181 car parking, 634 bicycle spaces and 16 motorbike spaces, plant rooms, bin storage, attenuation tanks and circulation;*
- c) *Phase 3 includes the redevelopment of the site to include:*
 - i. *495 no. build to rent residential units (comprising 61 no. studio, 150 no. 1 bedroom, 178 no. 2-bedroom, and 106 no. 3 bedroom apartments), residential support facilities, amenities and services in 4 no. blocks which comprise:*
 - (i) *Phase 3a – Block A1 – includes 98 build to rent units (comprising 16 no. studio, 33 no. 1 bedroom, 39 no. 2 bedroom, and 10 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including function room, with heights proposed as 6 no. storeys (19.175m above ground level), 9 no. storeys (27.8m above ground level) and 10 no. storeys (30.745m above ground level);*
 - (ii) *Phase 3b – Block A2 – includes 98 build to rent units (comprising 16 no. studio, 33 no. 1 bedroom, 39 no. 2 bedroom, and 10 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including function room, with heights proposed as 6 no. storeys (19.175m above ground level), 9 no. storeys (27.8m above ground level) and 10 no. storeys (30.745m above ground level);*
 - (iii) *Phase 3c – Block B – includes 173 build to rent units (comprising 18 no. studio, 38 no. 1 bedroom, 54 no. 2-bedroom, and 63 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including Games Room, Dining Area, Study Hub, with heights proposed as 3 no. storeys (10.4m above ground level), 4 no. storeys (13.175m above ground level), 5 no. storeys (16.1m above ground level), 6 no. storeys (19.175m above ground level) and 7 no. storeys (21.95m above ground level);*
 - (iv) *Phase 3d – Block C – includes 126 build to rent units (comprising 11 no. studio, 46 no. 1 bedroom, 46 no. 2-bedroom, and 23 no. 3 bedroom apartments), resident support facilities including entrance / concierge, resident services and amenities including Homework Club, Communal Work Area with heights proposed as 3 no. storeys (10.4m above ground level), 4 no. storeys (13.175m above ground level), 5 no. storeys (16.1m above ground level), 6 no. storeys (19.175m above ground level) and 7 no. storeys (21.95m above ground level);*
 - ii. *Ground floor car parking (215 spaces) and bicycle parking (16 spaces);*
 - iii. *Service building including 1 no. creche, café and gym; and*
 - iv. *All associated ancillary development works including drainage, 4 no. electricity substations, access and roads within the site, pavements, new boundary walls, fencing, public open space, communal amenity space, tree planting, vehicle and pedestrian access and all associated site works.*

- d) *Phase 4 - Highway and pedestrian improvements including:*
- i. *Upgrading of the site and signals at the junction of Coolock Drive and Oscar Traynor Road;*
 - ii. *Provision of a signalised pedestrian crossing to the south of the site entrance on Coolock Drive; and*
 - iii. *Provision of a signalised pedestrian crossing at the proposed pedestrian entrance to the park off Greencastle Road.*

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

The application was accompanied by supporting documentation including an Environmental Impact Assessment Report (EIAR). Under the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 the proposed development was deemed not to trigger a requirement for a mandatory Environmental Impact Assessment (EIA) because the number of units was 495 and so marginally below the threshold. However, it was decided to apply the precautionary approach and prepare an EIAR to determine if the proposed development would be likely to have a significant effect on the environment.

The Board completed an EIA in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures set out in the EIAR, the effects on the environment of the proposed development, by itself and in combination with other development in the vicinity, would be acceptable.

Additional documents including an Appropriate Assessment Screening Report and Natura Impact Statement were also submitted in support of the application. In concluding its Appropriate Assessment, the Board was satisfied that the proposed development would not adversely affect the integrity of European sites in view of the site’s conservation objectives.

Having regard for the site’s location, the provisions of the Dublin City Development Plan 2016-2022 and the relevant national planning policies and guidance, the Board decided on 13th August 2019 to grant permission to the proposed development, subject to conditions. Of particular note is Condition 4 which states:

“4. The proposed development shall be amended as follows:

- (a) The westernmost 10 storey element of Block A1 and the westernmost 10 storey element of Block A2 shall be reduced by the omission of two intermediate floors to a maximum of 8 storeys.*
- (b) The easternmost 10 storey element of Block A1 and the easternmost 10 storey element of Block A2 shall be reduced by the omission of one intermediate floor to a maximum of 9 storeys.*

Revised plans and particulars shall be submitted to and agreed in writing with the planning authority prior to commencement of works.

Reason: *In the interest of the proper planning and sustainable development of the area.”*

The amendments to the permitted scheme required by Condition 4 would result in a total of 471 no. units within this residential development.

4. Proposed Alterations

Under the provisions of Section 146B of the Planning and Development Act 2000 (as amended), a formal request may be made to An Bord Pleanála by a person who is carrying out or intending to carry out a Strategic Infrastructure Development to alter the terms of an approval.

There is also recent precedent for An Bord Pleanála considering alterations to approved Strategic Housing Developments under the provisions of Section 146B. A request was made by Cairn Homes (ABP-303356-19) to alter the terms of approval with respect to a permitted SHD at Mariavilla, Maynooth. Another case included a request by Viscount Securities Ltd (ABP-304726-19) to amend the permitted SHD at Brennanstown Wood, Carrickmines.

Thus, the current request for alteration to the permitted SHD at the Former Chivers Factory site in Coolock, is made under Section 146B of the Planning and Development Act 2000 (as amended), in line with recent applications considered by the Board.

In accordance with Section 146B(2)(a) the Board must determine as soon as is practicable whether the proposed alteration would constitute “*the making of a material alteration of the terms of the development concerned*”. In order to make this determination Section 146B(2)(b) provides for An Bord Pleanála to invite submissions by such persons or classes of persons as it deems appropriate and for the Board to “*have regard to any submissions made to it on foot of that invitation*”.

It is noted that the precise nature or scope of a *material* alteration is not defined under the provisions of the Act. However, should the Board decide that the proposed alteration is material under Section 146B(3)(b) but would not be likely to have significant effects on the environment, it may make the alteration, make an alternative alteration or refuse to make the alteration following a public consultation period and inviting the making of submissions.

Where the Board decides that the alteration would be material and likely to have significant impacts on the environment, it will require preparation of an EIAR in accordance with the provisions of Section 146C and publication of a notice in the normal manner, as well as invite submissions or observations prior to making its determination on the matter.

In the interests of ensuring a comprehensive approach to this formal request for alteration to the permitted SHD at the Former Chivers Factory, an EIAR has been submitted with this application. In the first instance, the proposed development did not meet the threshold of *more than 500 dwellings* set out in Part 2 of Schedule 5 of the Planning and Development Regulations 2001. However, the precautionary approach was applied by the applicant and the original SHD application was accompanied by an EIAR. The current application seeking alteration to the permitted development involves 550 no. dwellings and therefore triggers the requirement for an Environmental Impact Assessment. Furthermore, a Stage 1 Appropriate Assessment and Natura Impact Statement (NIS) have been prepared and are submitted with this application.

The proposed alterations to the permitted SHD scheme at the former Chivers Factory site are as follows:

- (i) Facilities Building – Crèche moved to ground floor; Gym and associated changing rooms moved to first floor; Outdoor gym space added to first and second floor.
- (ii) Blocks A1 and A2 – Height changed from 6, 9 and 10 storeys to 6, 8 and 10 storeys; Reduction from 196 no. apartments to 180 no. apartments; Addition of laundry space and at ground floor level; Change in elevation materials in tower element from white to grey stone.
- (iii) Block B – Removal of ground floor parking and podium courtyard at first floor; Duplex units removed; Apartment cores amended to improve efficiencies; Increase in number of apartments from 173 no. to 213 no. units; New resident lounges, co-working space, laundry and reception with post room added;

Reconfiguration of central bar to allow for a central courtyard; Wider pedestrian entrances to courtyards; Minor facade changes including fenestration and materials.

- (iv) Block C – Removal of ground floor parking and podium courtyard at first floor; Duplex units removed; Apartment cores amended to improve efficiencies; Increase in number of apartments from 126 no. to 157 no. units. Wider pedestrian entrances to courtyards; Minor facade changes including fenestration and materials; New basement car park entrance; for Blocks A1 and A2 New resident lounge, laundry and concierge.
- (v) Basement - Slight increase in area from 11,707sq.m to 11,753sq.m; Increase in number of parking spaces; including stacked car parking, from 181 no. spaces to 308 no. spaces; Stacked bicycle parking added to maximise space efficiency; New basement entrance for cars; Reconfiguration of bins storage and plant to co-ordinate with changes to internal cores within the blocks.

Following in **Table 1** is a comparison of the development metrics, spanning the original SHD application, permitted development and the amended proposal.

Use	Original Application	Permitted Development	Proposed Alterations
Studio	61no.	61no.	67no.
1-Bedroom Unit	150no.	142no.	205no.
2-Bedroom Unit	178no.	162no.	222no.
3-Bedroom Unit	106no.	106no.	56no.
Crèche	300sq.m	300sq.m	300sq.m
Gym	412sq.m	412sq.m	412sq.m
Café	34sq.m	34sq.m	34sq.m
Car Parking Spaces	396no.	396no.	340no.
Motorbike Parking	16no.	16no.	14no.
Cycle Parking Spaces	650no.	650no.	679no.

TABLE 1 SUMMARY OF APPROVED DEVELOPMENT VS PROPOSED ALTERATIONS

The proposed changes to the approved scheme have been prepared predominantly to improve the appearance of the development by increasing the level of modulation in the design. This is to be achieved by a stepped approach to the building height for Blocks A1 and A2 ensuring greater articulation along the northern aspect of the site. The Board's condition (No. 4) requires a decrease in height of the 10 storey elements in Blocks A1 and A2, down to 8 and 9 storeys. Whereas the original proposal included 6, 9 and 10 storey elements within these 2 no. blocks, the alterations incorporate 6, 8 and 10 storey elements to increase the variation between the buildings and so enhance the stepped effect. **Table 2** highlights the difference between the original proposal, the permitted scheme and the proposed alterations with respect to the height of the development.

Block	Original Application (No. storeys)	Permitted Scheme (No. storeys)	Proposed Alterations (No. storeys)
Block A1	6	10 storeys elements reduced to 8 and 9 storeys	6
	9		8
	10		10
Block A2	6	10 storeys elements reduced to 8 and 9 storeys	6
	9		8
	10		10
Block B	3	3	3
	4	4	4

	5	5	5
	6	6	6
	7	7	7
Block C	3	3	3
	4	4	4
	5	5	5
	6	6	6
	7	7	7

TABLE 2 SUMMARY OF BUILDING HEIGHTS APPROVED VS PROPOSED

Coupled with the proposed changes to building height in Blocks A1 and A2, internal reconfiguration of the blocks has resulted in an overall increase in the number of units within the development, as summarised in **Table 1**. The breakdown in unit mix is indicated in **Table 3**.

Units	UNIT MIX (%)		
	Original Application (495 No. Units)	Permitted SHD (471 No. Units)	Proposed Alterations (550 No. Units)
Studio	12.3	12.95	12.1
1-Bedroom Unit	30.3	30.15	37.3
2-Bedroom Unit	36	34.4	40.4
3-Bedroom Unit	21.4	22.5	10.2

TABLE 3 UNIT MIX COMPARISON

The proposed alterations will retain the same block layout and buildings footprint, achieving site coverage of 42%. A decrease in the level of surface car parking, with a significant quantum relocated to the basement level, will result in a reduced plot ratio of 1.5, compared to 1.8 in the parent application.

5. Assessment of Proposed Alterations

5.1 Introduction

The permitted SHD was assessed in accordance with the national, regional and local planning policies and demonstrated to comply with the relevant requirements as part of the original application approval process. The current proposal remains substantially the same as the permitted scheme, retaining the overall site layout and building envelopes. A Housing Quality Assessment accompanies this application under separate cover, indicating that the proposed residential units satisfy the requirements of the Design Standards for New Apartments Guidelines (2018). In addition, the proposed changes are evaluated below against the main criteria raised in the assessment of the parent application undertaken by An Bord Pleanála.

5.2 Locational Context – Height and Density

“...the recent Urban Development and Building Height, Guidelines for Planning Authorities identify that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in urban areas but where it is proposed to have higher densities and height due regard must be given to the locational context, availability of public transport services and other associated infrastructure required to underpin sustainable residential communities.” (Inspector’s comment)

Inclusive of the proposed alterations, this development would achieve a gross residential density of 152.35 units per hectare. National planning policies endorse increased building height and higher densities to improve the sustainability of new development. This is reflected in the provisions of the Urban Development and Building Height Guidelines 2018 which adopt a performance based approach to building height in appropriate urban locations.

In respect of building height, the 2018 Guidelines indicate that:

“While achieving higher density does not automatically and constantly imply taller buildings alone, increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability.”

The subject site satisfies the criteria for an ‘Intermediate Urban Location’ and is therefore considered an appropriate location for the proposed height that will be achieved by the proposed alterations to the permitted scheme and the resultant increase in residential density, in line with national planning policy. ‘Intermediate Urban Locations’ are defined in the Sustainable Urban Housing: Design Standards for New Apartments 2018, as locations which are:

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

The site is in close proximity to high frequency bus services, including urban bus route 17A (Blanchardstown to Kilbarrack via DCU and Beaumont Hospital), which stops c.400m walking distance from the subject site on R104 and operates at a peak frequency of 10-15 minute intervals. Bus routes 27 / 27X stop at Greencastle Road and Coolock Drive adjacent to the site and travel between Clarehall and Jobstown through the city centre. This service operates at a frequency of 10 minute intervals between 06:00 and 19:30 on weekdays. The proximity and frequency of these services is in line with the criteria for intermediate urban locations, as set out above.

The forthcoming Bus Connects strategy established by the NTA, will further enhance connectivity at the subject site. It aims to develop continuous bus lanes along a series of bus corridors including along the Malahide Road, approximately 500m from the site. The delivery of Bus Connects will result in upgrades to the Malahide Road and improvements to bus service frequency and reliability.

The site is also located c.6km north-east of Dublin City Centre, being an international business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer.

Furthermore, the site is ideally located near a range of significant employment generating uses, as follows:

- Dublin Airport is located 3.9km to the north-west. It is the 11th busiest airport in the European Union and supports 117,300 jobs in the Irish economy, including 19,200 people employed directly at the airport and its environs. The economic activity underpinned by Dublin Airport in terms of the spin-off benefits through trade, tourism, and jobs is worth €8.3 billion to the Irish economy annually.
- Beaumont Hospital is c.1.3km to the west. The hospital employs approximately 3,000 staff and has 820 beds. It is the principal teaching hospital for the Royal College of Surgeons in Ireland and has close links with Dublin City University, particularly in the area of nurse training, and with other academic institutions in respect of training and research.
- Dublin City University (DCU) is c.3.6km to the south-west and is a substantial generator of employment opportunities in the locality and Dublin City. The Glasnevin campus currently employs approximately 1,500 staff for academic purposes and a wide array of supporting services. The university also has around 16,000 students, with a large number seeking accommodation in the locality and surrounding suburbs.
- Malahide Road Industrial Park is c.450m to the north and occupied by a range of industrial, wholesale and professional service businesses. It is currently the source of approximately 1,000 jobs.
- The IDA Business and Technology Park, Clonshaugh, is located c.1.5km to the north-west. It is occupied by 105 businesses comprising a wide range of industrial, wholesale and service companies.
- Airways Industrial Estate is approximately c.2.3km to the north-west. It contains a range of industrial, wholesale and professional service businesses.

A wide array of retail facilities also provides a high level of services and amenities in the vicinity of the subject site, serving the needs of the local population and providing an additional source of employment, including:

- Northside Shopping Centre is situated c.640m to the west of the site and is occupied by 65 to 70 shops and other services, including Dunnes and SuperValu supermarkets, as well as medical and dental surgeries, a WellWomen Centre, a post office and a credit union, as well as a bulky-goods retailers.

- Clare Hall Shopping Centre is located c.1.3km to the north-east and is home to 28 no. retail outlets including a Tesco Extra store with extensive trading hours.
- Northside Retail Park is located on adjacent lands to the south and includes an Aldi supermarket and Mr Price store.
- The Odeon Cinema and Leisureplex, Coolock are located c.430m to the east.

It is noted that in the Direction of the Board, it identified “*the site’s location within the built-up area of Dublin in proximity to a range of services and facilities including the bus corridor along the Malahide Road*” as one of the reasons for its decision to grant permission to the original application. In its Direction, the Board stated:

“the proposed development was located within sufficient distance of several major employment centres including Beaumont Hospital and the City centre and also within 1km of a high capacity integrated public transport system and was satisfied that the development at the scale and density proposed would be fully in accordance with the provisions of the Urban Development and Building Heights Guidelines for Planning Authorities, 2018.”

Thus, the Board has recognised the strategic location of the subject site which benefits from a high level of accessibility and services, including public transport infrastructure.

It is further considered that the additional resident population generated by the current proposal, coupled with the future growth associated with development of nearby lands such as the Cadbury’s factory site and the Oscar Traynor Road site, will contribute to building critical mass and so ensure increased investment in public transport in this location.

Paragraph 2.4 of the Urban Development and Building Height Guidelines 2018 acknowledges the importance of building critical mass to maximise efficiencies in investment and ensure the creation of more sustainable communities:

“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors and networks.”

5.3 Urban Design, Layout and Visual Impact

“The Urban Design Manual – A Best Practice Guide which is a companion document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, uses 12 criteria that are designed to encapsulate the range of design considerations for residential development. The Urban Design: New Apartment Guidelines for Planning Authorities, 2018 also provides relevant standards both in quantitative and qualitative terms. The documentation talks about the proposal being a positive identity to the area. I am not convinced of this. While the design strategy of delivering blocks within a new urban quarter is generally acceptable, there has been no analysis in this instance as to the locational context and how the size and scale of the blocks would successfully integrate into or enhance the character and public realm of the area having regard to the topography of the site and the proximity of domestic scale residential development.” (Inspector’s comment)

As an underutilised site at present, the legibility of these urban lands is undermined and detracts from the visual amenity of the surrounding environment. The large size of the subject site, including the adjoining public open space (Z9 lands) presents an opportunity for a high quality, large-scale housing scheme that will contribute to a sense of place and strengthen the sustainability of the local community. Section 5.2 of this

report provides an extensive analysis of the location context, having regard to the urban setting of the site and its suitability for higher density residential development. The analysis also details the proximity of the site to nearby public transport services, employment centres and services.

A key element of the current proposal is to open up the existing public park which adjoins the Greencastle Road boundary in the north of the site. This part of the site is zoned Z9 (Amenity / Open Space Lands / Green Network). The aim of the Z9 Zoning Objective is:

“To preserve, provide and improve recreational amenity and open space and green networks”.

The development proposal will ensure that access to this linear park along the Santry River is re-opened to enable public access, consistent with the Z9 Zoning Objective. The improved accessibility of the parklands will significantly enhance permeability at the site and enable continuation of the green network located on the western side of Coolock Drive, linking it with the Stardust Memorial Park.

Permeability will also be improved through the provision of multiple access points. Vehicular access to the residential portion of the development will be provided at Coolock Drive aligned with the existing accessway into the Chivers factory. The location of the Santry River along the northern part of the site precludes an additional vehicular access point at the northern boundary. Another pedestrian access point will be situated to the north of the Aldi site and will be available for pedestrians and cyclists. The provision of the proposed vehicular and pedestrian links coupled with the internal network of streets will also significantly enhance legibility at this site.

Within the north-west portion of the site, the proposed entrance pavilion building which will contain the crèche and gym shall be open to the public in order to benefit the wider community and contribute to the revitalisation of these lands by promoting greater levels of activity and movement.

Whilst the Inspector’s report raises concerns that the 12 criteria set out in the Urban Design Manual were not adequately addressed, the Direction of the Board stated:

“The Board did not accept the Inspector’s view that the arrangement of the proposed blocks and overall design of the scheme is monolithic and considered that subject to some modification by condition that an acceptable degree of variation and modulation of form and height was achieved which would not detract from the character and pattern of development in the immediate area.”

Notwithstanding the Board’s Direction, a detailed Architectural Design Statement has been prepared to accompany this application for alterations to the permitted SHD and comprehensively addresses the 12 criteria.

As indicated in the Architectural Design Statement, the Masterplan responds to the site context by setting out an integrated plan for the layout of blocks and streets. It also provides a detailed explanation of the design rationale that underpins the proposal and the how the development addresses the linear park that extends along the Santry River. Activation of the northern part of the site along the linear park will be achieved through extensive landscaping treatment and provision of an attractive public realm that will draw people and activity into the site. The location of the services building in the north-western portion of the development is intended to complement the recreational uses associated with the linear park.

The enhanced degree of modulation and articulation that will be achieved through the proposed stepping down from 10 to 8 storeys in Blocks A1 and A2 (rather than 10 to 9 storeys as required by Condition 4 of the consent), will improve the visual impact of the scheme, particularly along its northern elevation at Greencastle Road. This increase in gradation between the taller elements will reduce the scale of the proposed development as

viewed from the north. At the same time, retention of the 10 storey elements is an important design feature that will create visual landmarks at the site, creating of a sense of place.

Retention of the perimeter block system as it was proposed within the permitted scheme ensures that there is a clear delineation of public and private spaces. The height of the buildings that line the internal network of streets, as well as the western boundary along Coolock Drive have been maintained to respond sensitively to the surrounding residential uses and achieve appropriate 'human-scaled' proportions within the development site. The location of residential units overlooking the public park and semi-private courtyards within Blocks B and C will enable passive surveillance and contribute to the safety and security of these spaces.



FIGURE 2 NORTHERN ELEVATION

The proposed alterations to the building façades involve a change in the selection of building materials. Grey stone will be used in the tower elements within Blocks A1 and A2, while Blocks B and C incorporate slight changes to the materials and fenestration. These alterations are intended to better integrate the development with the established character of the area and create a sense of scale through definition and articulation of the façade fenestration. The architectural treatment of these elements has also been designed to create a distinct identity within the overall scheme.

A palette of quality, durable materials are proposed for the external facades. Materials have been selected for their suitability to the local environment, ability to provide variety in terms of colour, texture and tone, and their appropriateness to the building use.

Therefore, the proposed alterations have been carefully designed to ensure this residential scheme contributes to the creation of an attractive and vibrant urban neighbourhood at this brownfield site. The proposal will lead to regeneration of this former industrial land in a manner that responds appropriately to the existing character of surrounding development. Whilst the building footprint remains unchanged, the design strategy underlying the proposed alterations seeks to enhance the overall level of articulation within the development to address the Board's Direction regarding modulation of the building form and height.

5.4 Resident Amenity

“My main concerns pertaining to the residential support services, is the lack of clarity regarding the management of these spaces and how residents will be encouraged to utilise all of these spaces due to their sporadic dispersion throughout the blocks. I also note that the TTA submitted indicates that the gym and café are for residents use only. If this is the case, I do not consider that the provision of such amenities in a stand-alone services structure is the most efficient use and this also raises questions with regard to future maintenance and viability of this structure particularly when the crèche is located within this structure.”
(Inspector comment)

In the ABP Direction, however, it was advised:

“The Board was also satisfied that the provision of a standalone service building when taken in conjunction with the additional communal areas spread throughout the proposed development represented an innovative design response to the brief and would create a positive shared living environment which promotes integration between residents...”

In response to the Direction of the Board the services building which was incorporated into the permitted scheme has been retained. However, to address the concerns raised in the Inspector’s report, the provision and location of communal amenities has been re-considered to ensure that their benefit to future residents is optimised.

Further to the Inspector’s report, it is confirmed that the proposed café and gym which are located within the service building will be made available for both future residents within the scheme and the wider community to maximise their benefit to the local population. An extensive range of resident amenity spaces shall also be provided and the allocation of these spaces within the respective blocks slightly altered to best serve the needs of residents and encourage use of these spaces / facilities.

A summary of the proposed resident amenity areas is contained in **Table 4** as follows:

Block	Permitted Scheme	Proposed Alterations
Basement	<ul style="list-style-type: none"> Bins Storage (1,067sq.m) <p>Total Amenity Space: 1,067sq.m</p>	<ul style="list-style-type: none"> Bins Storage (574sq.m) <p>Total Amenity Space: 574sq.m</p>
A1	<ul style="list-style-type: none"> Entrance/Concierge (38sq.m) Function Room (110sq.m) Bins Storage (19sq.m) <p>Total Amenity Space: 167sq.m</p>	<ul style="list-style-type: none"> Residential Lounge (94 sq.m) Concierge (16 sq.m) Laundry (20 sq.m) Bins Storage (19 sq.m) <p>Total Amenity Space: 149 sq.m</p>
A2	<ul style="list-style-type: none"> Entrance/Concierge (38sq.m) Function Room (110sq.m) Bins Storage (19sq.m) <p>Total Amenity Space: 167sq.m</p>	<ul style="list-style-type: none"> Residential Lounge (94 sq.m) Concierge (16 sq.m) Laundry (20 sq.m) Bins Storage (19 sq.m) <p>Total Amenity Space: 149 sq.m</p>
B	<ul style="list-style-type: none"> Entrance/Concierge (96sq.m) Games Room (34sq.m) Dining Area (100sq.m) Study Hub (97sq.m) Bins Storage (181sq.m) Store (127sq.m) 	<ul style="list-style-type: none"> Residential Lounge (61.5 sq.m) Residential Lounge (121sq.m) Residential Lounge (171 sq.m) Co-Work Space (78 sq.m) Concierge (34 sq.m) Reception (52 sq.m) Post Room (21 sq.m)

Block	Permitted Scheme	Proposed Alterations
	Total Amenity Space: 635sq.m	<ul style="list-style-type: none"> Laundry (45 sq.m) Total Amenity Space: 583.5 sq.m
C	<ul style="list-style-type: none"> Entrance/Concierge (88sq.m) Communal Work Space (77.5sq.m) Homework Club (32sq.m) Bins Storage (33sq.m) Total Amenity Space: 230.5sq.m	<ul style="list-style-type: none"> Facilities Hub (105 sq.m) Concierge (36 sq.m) Laundry (28 sq.m) Total Amenity Space: 169 sq.m
Service Building <u>Note:</u> These facilities will serve residents and the wider community.	<ul style="list-style-type: none"> Gym (412sq.m) Café (34sq.m) Crèche (300sq.m) Total Amenity Space: 746sq.m	<ul style="list-style-type: none"> Gym (197sq.m) Out Gym Space (329 sq.m) Café (34sq.m) Reception (45 sq.m) Office (24 sq.m) Crèche (291sq.m) Total Amenity Space: 920 sq.m
Overall Development	Total Amenity Space: 3,012.5sq.m	Total Amenity Space: 1,932.5sq.m

TABLE 4 SUMMARY OF RESIDENT AMENITIES AND SERVICES

As indicated in **Table 4** above, there has been a change to the nature and extent of communal amenities and support services proposed within the scheme. It is noted, however, that the biggest change arises from the reconfiguration of the basement level to relocate car parking from the surface level and improve efficiencies which resulted in a reduction to the bin storage area.

The proposed increase in unit numbers creates a requirement for provision of 3,792sq.m of communal amenity space. The current proposal provides a total of 1,932sq.m communal amenity spaces. However, the distribution and type of amenities has also been modified to improve the quality of the amenities and ensure these spaces and support services provide an enhanced experience for future occupants and better meet the needs of residents. It is also considered that the provision of a substantial quantum of public open space within the development site (15,660sq.m) satisfactorily addresses the shortfall by providing significant compensatory amenity space in accordance with the requirements of SPPR 8 (ii) of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2018) which allow for flexibility in the allocation of these spaces and facilities/services:

“Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity”

It is further noted that all apartments will benefit from the provision of private amenity space in the form of balconies and terraces. Thus, the extensive provision of private open space, communal amenity space and public open space throughout the development site will be of benefit to all future residents and satisfies the requirements in relation to this matter.

This application is accompanied by a Sunlight, Daylight and Overshadowing Assessment prepared by Metec and submitted under separate cover. The assessment indicates that the proposed development will not adversely impact on the amenity of future occupants or neighbouring residents. The key conclusions from that report are:

- The assessment confirms that access to sunlight for residents of Coolock Drive, when compared with their existing baseline experience, will not be compromised as a result of the proposed development because the Annual Probable Sunlight Hours (APSH) calculated achieve the BRE Guide recommended values for safeguarding access to sunlight in existing dwellings. Further, the buildings on Greencastle Road are sufficiently distant from the proposed development to conclude that they will not be adversely affected in terms of sunlight impact. Within the development, 90% of living rooms meet the BRE metrics for APSH during the winter months and 77% meet the BRE metrics over the whole year. The massing of the proposed development has been carefully designed so that all amenity areas exceed the BRE recommended criteria for sunlight. Within the central courtyards, seating and play areas have been strategically situated in areas that will receive the most amount of sunlight.
- Extensive analysis of proposed apartments indicates that only 3% of units will not meet the BRE recommendations for access to daylight. For effected units, compensatory measures will be utilised including larger balcony spaces, larger unit sizes, higher glazing specifications and ensuring many of these units are dual aspect. The simulations demonstrate that the proposed development will not compromise nearby residential properties situated on the western side of Coolock Drive. In addition, existing buildings on Greencastle Road are sufficiently distant from the proposed development to conclude that the availability of daylight will not be affected.
- Any overshadowing that is likely to occur will be to the adjacent properties on Coolock Drive and to a lesser extent the properties on the Greencastle Road. The industrial units to the east of the proposed development site will also incur a small level of evening shade, however, this is not considered critical as these units do not have a specific sunlight requirement. The results of the simulation demonstrate that the guidelines for maintaining light received by existing buildings has been achieved.

5.5 Traffic and Transport

“A mobility management plan and officer should be in place prior to occupation of the units to ensure that future occupants are aware of the constraints regarding parking and that they are aware of public transport facilities in the area.... While there is flexibility with regard to parking spaces for BTR schemes given the locational context of the site, the scale of the reduction in this instance i.e. 0.79 spaces per unit, is not justified given the absence of alternative modes of public transport in the area.”

A supplementary Traffic and Transport Assessment (TTA) has been prepared by AECOM in support of the proposed alterations and is submitted under separate cover. Whilst the TTA provides a comprehensive evaluation of the proposal and responds to the concerns noted in the Inspector’s report, the following matters are noted:

- The Mobility Management Plan (Section 10 of TTA) has been updated to respond to the proposed alterations and to address the matters raised in the Inspector’s report. It incorporates a series of measures to discourage private car trips to and from the development, promote walking and cycling as the preferred modes of travel, encourage public transport use and coordinate with adjacent

developments and employment areas to implement the plan. An Action Plan Co-ordinator will be appointed prior to construction and will ensure the measures are in place prior to occupation of the residential units.

- The car parking strategy has been developed to align with national and local planning policies that allow for reduced car parking provision in appropriate locations. The proposed quantum of car parking will achieve a ratio of 0.61 spaces per unit and is deemed appropriate, having regard to the location of the site, its proximity to major centres of employment and accessibility to public transport. 10 no. dedicated 'Go Car' spaces have also been allocated within the scheme to promote alternatives to private car ownership and these spaces will be located at surface level to ensure their accessibility to all future residents. The provision of 670 no. secure bicycle parking spaces at basement level and ground floor will encourage cycling as a key mode of travel. In addition, new pedestrian and cycle paths will be provided in / out of the site to further promote walking and cycling.
- The subject site enjoys access to high frequency urban bus services with nearby stops at Greencastle Road, Coolock Drive and Malahide Road QBC. The available Dublin Bus services provide connections to an extensive area within Dublin, including the city centre. The site is also located 1.9km from Harmonstown DART station where rail services operate every 15 minutes at peak times. The forthcoming Bus Connects programme will result in upgrades to the existing bus corridor (QBC) along Malahide Road (D1 route) and it is planned to operate high frequency services every 4 minutes. Additionally, the D2 and D3 services will operate along Coolock Drive and Malahide Road respectively at 15 minute intervals on weekdays.

Further to the above, it is acknowledged that the Inspector's report raises concerns about congestion on Coolock Drive. However, some levels of road congestion are to be anticipated given its urban location. Traffic volumes in the vicinity of Coolock Drive and Greencastle Road have been monitored for the purposes of the TTA and are deemed within acceptable limits. The TTA also provides an assessment of the impacts on the local road network, having regard to future trips likely to be generated by the proposed development. It is concluded that sufficient capacity exists within the existing road network for the modest level of increased traffic which would be generated by the proposed development.

5.6 BTR Schemes

"...given the location of the site which is not within 500m of a QBC and distant from a DART/Luas line, I am not convinced that the location is entirely suitable for a BTR scheme of the scale proposed." (Inspector's comment)

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."

Demographic trends 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 contain apartments. CBRE Ireland research published in 2019 identifies this deficit as a particular problem within Dublin, 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

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:

“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.”²

The National Competitiveness Council has repeatedly highlighted the substantial threat to Ireland’s competitiveness arising from the severe shortage of available and affordable accommodation.³ 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.”⁴

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 Irish 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 professionals working in Dublin 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.

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 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)

³ National Competitiveness Council, December 2018, *Ireland’s Competitiveness Challenge 2018* (p.6)

⁴ American Chamber of Commerce Ireland, August 2017 (p.6)

In response to the Inspector's concern regarding the locational context for such a scheme, it is noted that the Board approved another application for SHD at Malahide Road, Clare Hall (ABP Ref. 304196-19) which is comparable in terms of being a high density BTR scheme (347uph) in the locality. In the report to the Board relating to that application, the Inspector made the following comments:

“The site is within comfortable walking distance from bus stops on the Malahide Road that have frequent services to the city centre... The public transport available to residents of the proposed development is therefore as good as that available anywhere that is not served by a railway. There is a mix of uses within walking distance of the site at the shopping centre at Clarehall and along the Malahide and Northern Cross Roads that provides a range of commercial services and places of employment. Further mixed use on the land near the site is planned under the SDRA 1 and KDC designations under the development plan. In the context of the wider city region as it now functions, therefore, the site should be regarded as being in an accessible urban location. Because the site is within 500m walk of a bus stop with frequent services it meets the definition for accessible locations in section 2.4 of the 2018 guidelines on apartment design, which are stated to be suitable for higher density apartment developments, and the definition of public transport corridors the 2009 sustainable urban residential guidelines where higher densities of at least 50dph are advised, The proposed development would be in keeping with the policies set out in both sets of guidelines. It would not represent over-development of the site.”

Having regard for the characteristics of the permitted scheme at the subject site and the approved SHD at Clare Hall, it is evident that the Board is supportive of BTR developments in this locality and considers these sites as suitable for densification, being accessible urban locations served by high frequency bus services.

A review of SHD decisions by the Board, revealed that there is significant support for high density developments in appropriate locations, in line with national policy objectives. Particularly noteworthy are the following cases, where high density developments including BTR schemes, were approved in locations comparable to the subject site, with respect to accessibility considerations, as follows:

- **304405:** 428 no. units at Blackthorn Drive and Carmanhall Road, Sandyford. This site is located c.8km from the city centre and is accessible to the green LUAS line. The approved development has a net density of 255uph and is 5-14 storeys in height.
- **304383:** 492 no. BTR apartments at Concord Industrial Estate, Walkinstown. This site is close to the Bluebell LUAS stop and approximately 5.6km from Dublin city centre. The approved development has a density of 262uph, height of 4-8 storeys and car parking provision at a ratio of 0.48 spaces per unit.
- **304196:** 132 no. BTR apartments at Malahide Road, Clare Hall. This site is c.7.3km from the city centre and served by high frequency bus services at Malahide Road. The approved development has a density of 347uph, height of 9 storeys and car parking provision at a rate of 0.6 spaces per unit.
- **304068:** 142 no. BTR apartments at Stillorgan Road, Foxrock. The site is c.9km from Dublin city centre and is accessible by urban bus services on the Stillorgan Road QBC. The approved development has a density of 167uph, height of 2-7 storeys and car parking provision at a rate of 0.64 spaces per unit.
- **303435:** 265 no. BTR apartments at Davitt Road, Dublin 12. The site is located c.3.8km from the city centre and is accessible to the red LUAS line. The development will have a density of 321uph, height of 3-7 storeys and car parking provision at a rate of 0.45 spaces per unit.
- **303358:** 112 no. BTR apartments at Swiss Cottage Public House, Swords Road, Santry. This site is c.5.5km from the city centre and benefits from accessibility to high frequency urban bus services. The approved development has a density of 233uph and height of 3-6 storeys.

In addition to the above, Section 5.2 of this report provides a thorough evaluation of the site context including a detailed description of its accessibility to employment centres, public transport, retail and other supporting services. It is therefore considered that the site has been demonstrated as an appropriate location for a BTR scheme, contrary to the Inspector's comment in respect of the parent application.

6. Conclusion

The design of the proposed development has been informed by an understanding of the site context and the requirement to comply with planning and environmental legislation and policy. The proposed alterations have been carefully planned to respond to matters raised in the assessment of the permitted SHD application and arising from the Board's decision.

The proposed development comprising a total of 550 no. Build to Rent units presents an opportunity to contribute to the available stock of rental accommodation in a high density residential scheme, consistent with national and local planning policies that aim to achieve compact growth and consolidation objectives.

This Planning Report, accompanied by a range of supporting documentation has demonstrated that:

- The design modifications comprehensively address the matters raised in the Board's Direction by improving the degree of modulation and articulation, particularly along the northern elevation. This has been achieved through amendments to the proposed building heights which will increase the gradation, moderating the perceived scale of the development. At the same time, the taller elements will create a focal point within the scheme by establishing visual markers in this new neighbourhood, contributing to a sense of place. Changes to the fenestration and selection of building materials will further improve the visual impact and respond to the established character of surrounding residential development.
- In addition to a substantial public open space area in the northern part of the site, the proposal incorporates high quality communal open spaces and resident amenities that will ensure the creation of an attractive, vibrant new neighbourhood at this disused industrial site. The range of amenities will promote activity within the scheme and encourage a high degree of social integration. The provision of these spaces is distributed throughout each of the blocks within the development, to ensure that all residents benefit from ready access to amenities and other resident support services. The location of the services building which will be open to the public will also promote activity, drawing people from the local community into the site.
- The subject site is an appropriate location for a high density BTR scheme as it is within close proximity to major centres of employment including DCU and Beaumont Hospital and Dublin City Centre. High frequency public transport services operate in the vicinity of the site, with bus stops located at Coolock Drive, Greencastle Road and Malahide Road (QBC). An extensive range of additional retail and recreational services / facilities are also available in the locality. There is also a vast amount of research available to show that there is a significant undersupply of housing, coupled with strong demand for rental accommodation, particularly to suit the needs of smaller households.
- The proposed layout and design of the scheme adheres to the 12 criteria contained in the Urban Design Manual for Sustainable Residential Development in Urban Areas. The scheme has been designed to provide a permeable and accessible layout for pedestrians and facilitates walking, cycling and vehicular links to the surrounding area. The proposed layout also incorporates a significant public open space encompassing the Santry River which will extend the existing green network and serve the wider community.
- Subject to implementation of the mitigation measures set out in the accompanying EIAR, the effects on the environment of the proposed development, by itself and in combination with other development in the vicinity, would be acceptable.

Ireland is currently experiencing a housing crisis which has been exacerbated by a lack of housing supply. There is an urgent and pressing need to bring forward deliverable housing sites which have the ability to be developed in the short term.

Therefore, based on the evidence presented, it is submitted that the proposed alterations should be granted planning permission to enable delivery of a high quality residential scheme that will ensure a more efficient use of this former industrial site. The proposal will enable significant regeneration of these disused lands and contribute to the national objective of doubling the delivery of homes by 2020, and further by 2027.

It is our considered opinion that the proposed scheme meets the principles of proper planning and sustainable development. We respectfully request that this application for alterations to a permitted SHD at the Former Chivers Factory Site, Coolock, submitted under Section 146B of the Planning and Development Act 2000 (as amended), be granted planning permission.