



THORNTON O'CONNOR  
TOWN PLANNING

# Response to ABP Opinion

## Planning Application

In respect of a Shared Living Residential  
Development at

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

Submitted on Behalf of  
Bartra Property (Castleknock) Limited

August 2020



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## 1.0 INTRODUCTION

For this proposed strategic housing development, the consultations with the Planning Authority were held on 6<sup>th</sup> July 2018. The request for consultation with the Board was made on 26<sup>th</sup> October 2018 (Board Ref. No. PLo6F.302888). The Board gave its Opinion under Section 6(7) of the 2016 Act on 20<sup>th</sup> December 2018 and a Response to this Opinion is enclosed with the application.

An application for a strategic housing development permission was, in turn, made on 18<sup>th</sup> September 2019 (An Bord Pleanála Ref. No. PLo6F.305459). That application was granted permission by the Board on 6<sup>th</sup> January 2020. However, the validity of the decision made by the Board was questioned by way of judicial review (High Court Record No. 2020/175JR.) By Order of certiorari of the High Court made on 25<sup>th</sup> June 2020, the decision of the Board was quashed on the ground that the Board failed to give adequate reasons for its decision and in particular failed to give adequate reasons for disagreeing with the recommendations of the Board Inspector's Report dated 21<sup>st</sup> November 2019.

In substance and effect, the process has been unwound to a point immediately before the application was made on 18<sup>th</sup> September 2019.

The validity of the Opinion given by the Board under Section 6(7) of the 2016 Act has never been questioned, is free from challenge and remains perfectly valid.

Thus, this application is lodged based on the pre-application consultation carried out to date with both Fingal County Council and An Bord Pleanála.

The purpose of this document is thus to respond to the issues raised by An Bord Pleanála in their Notice of Pre-Application Consultation Opinion issued under An Bord Pleanála Ref. ABP-302888-18, dated 19<sup>th</sup> December 2018 in relation to a proposed Shared Living development at the Brady's Public House, Old Navan Road, Dublin 15.

The Opinion states that it is the Board's determination that the documents submitted with the pre-application consultation request require further consideration and amendment to constitute a reasonable basis for lodging an application for strategic housing development. An Bord Pleanála considers that 4 No. issues need to be addressed in the documents submitted (response outlined in Section 2.0 below) that could result in the proposal constituting a reasonable basis for a strategic housing development application. An Bord Pleanála has also requested that 3 No. Statutory Consultees should be notified in the event of making an application (outlined in Section 3.0) and that specific information should be submitted with any application for permission (response outlined in Section 4.0).

## 2.0 RESPONSE TO KEY POINTS RAISED BY AN BORD PLEANÁLA

### 2.1 Item No. 1 of the Opinion – Principle of Shared Accommodation Provision at this Location

#### Principle of Shared Accommodation provision at this location

*'Further consideration of the documents as they relate to the principle of Shared Accommodation at this location. This consideration and justification should have regard to, inter alia:*

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

*(ii) The Sustainable Urban Housing: Design Standards for New Apartments, specifically the guidance on Shared Accommodation Developments and in particular sections 5.18, 5.19 and 5.22 and SPPR 9 of same; and*

*(iii) the suitability of this location for Shared Accommodation with regard to accessibility and connections to employment centres and community facilities. Comprehensive information regarding the nature of the proposed use should be submitted to facilitate assessment of this issue including details of the occupation, operation and management of the scheme. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to density and layout of the proposed development.'*

#### 2.1.1 Applicants Response (i)

**Further consideration of the documents as they relate to the principle of Shared Accommodation at this location having regard to the vision for the development of Blanchardstown and relevant housing and settlement policies set out in the *Fingal County Development Plan 2017-2023*:**

For the full response to this item please refer to Section 6.1 of the Statement of Consistency Report and Section 1.2.2 of the Justification Report prepared by Thornton O'Connor Town Planning and enclosed as a separate document.

In response to item (i) Thornton O'Connor Town Planning have demonstrated that the proposed development is in accordance with the vision for the development of Blanchardstown as set out in the *Fingal County Development Plan 2017 – 2023* which notes the following aim:

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

We highlight that there is currently no timeframe in place for the preparation of the Blanchardstown Village Urban Framework Plan as confirmed by Fingal County Council on 23<sup>rd</sup> July 2020 (see Appendix A) where the following was stated:

*'The preparation of the Blanchardstown Framework Plan is not on the current work programme for the Planning and Strategic Infrastructure Department. At the moment, there is no indicative timeframe available for its preparation'.*

As such we refer to Section 6.0 of the Statement of Consistency Report which notes that the scheme complies with the following relevant housing and settlement policies set out in the Development Plan:

- **Objective PM44** which aims to *'encourage and promote the development of underutilised infill...sites in existing residential areas'*;
- **Objective SS08** aims to identify opportunities for infill development which will in turn reduce the need to zone additional greenbelt lands; and
- **Objective SS15** highlights the need to maximise the efficient use of existing infrastructure and services by consolidating existing urban areas through infill and appropriate brownfield redevelopment.
- **Objective EDo4** states the following:

*'Prioritise locating quality employment and residential developments in proximity to each other in order to reduce the need to travel and ensure that suitable local accommodation is available to meet the needs of workers in the County'.*

The site is located within 15 No. minutes or 1,500 metres walking distance of Connolly Hospital, in addition to other significant employment locations as detailed below:

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

We also highlight Objective MT05 of the *Fingal County Development Plan 2017 – 2023* which refers to providing higher density development along higher capacity public transport corridors.

The subject site is a highly accessible location which is well serviced by existing public transport routes including various bus routes as detailed at Section 2.3 of the accompanying Planning Report and Castleknock Train Station which is located 550 No. metres / 7 No. minutes walking distance to the south-west, thus demonstrating that the subject site is suitable to provide higher density development on an existing urban brownfield site.

Capacity figures of DART, Commuter Rail and InterCity services were published by the NTA in the National Heavy Rail Census Report 2018 (released July 2019). Peak Hourly Passenger Flow published in Table 21 of this report indicate a maximum peak hourly flow of 4,166 No. passengers in the morning peak hour for commuter services on the Maynooth/Dublin Line. According to Irish Rail Timetables, 6 No. trains serve Castleknock Station with a maximum capacity (seated + standing) of 1280 No. passengers per train (based on an 8-car train) during the morning peak between 8.00-9.00am. This equates to a total hourly flow capacity of 7,680 No. passengers for the peak hour. Based on these figures, it can be concluded that the Commuter service between Castleknock and Dublin city centre is operating at

approximately 54% of its total capacity during the peak hour. Therefore capacity exists to cater for residents from the proposed development to utilise this service.

At a regional level, we refer to Section 5.1 of the Statement of Consistency which discusses the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* which clearly defines Blanchardstown as a Metropolitan Consolidated Town. These areas are described as '*strong active urban places within metropolitan areas with strong transport links*'. The application site is located c. 800 m from Blanchardstown Main Street which contains a Supervalu, Bank of Ireland, bars and restaurants, a post office and a medical centre for example. We note that large scale employment locations are also located in close proximity to the site (Connolly Hospital, Dublin Enterprise Zone and Blanchardstown Town Centre etc.). Therefore, the subject site is considered to be located within a core urban area of the Greater Dublin Area.

We note that 4 No. storeys has previously been granted at the subject site and the addition of a partial extra floor towards the centre of the site represents the proper planning and sustainable development of the area having regard to the newly introduced Building Height Guidelines and the ability of the subject site to absorb this additional height fronting onto a large area of open space.

We highlight that the proposed development is fully in accordance with the vision for development of Blanchardstown as set out above. The development will increase the residential population within Blanchardstown by providing 210 No. bedspaces and will thus support the existing commercial, social and leisure facilities throughout the town.

### 2.1.2 Applicants Response (ii)

**Further consideration of the documents as they relate to the principle of Shared Accommodation at this location having regard to the *Sustainable Urban Housing: Design Standards for New Apartments*, specifically the guidance on Shared Accommodation Developments and in particular sections 5.18, 5.19 and 5.22 and SPPR 9 of same:**

Item (ii) refers to the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines Planning Authorities 2018*. We note that full details in relation to compliance with the *Apartment Guidelines, 2018* is provided in Section 4.6 of the Statement of Consistency and in the Shared Living Report enclosed. We further note that a recent decision by An Bord Pleanála to grant permission for a Shared Living Scheme at the Old School House, Eblana Avenue, Dún Laoghaire, Co. Dublin [ABP Ref. ABP-304249-19] has informed the layout of the proposed Shared Living scheme at the subject site, particularly in relation to the provision of communal living/kitchen/dining spaces.

This Statement of Consistency document prepared by Thornton O'Connor Town Planning sets out how the proposed Shared Living Development will respond to Government Policy as set out in *Rebuilding Ireland – Action Plan for Housing and Homelessness* by addressing the need for alternative types of accommodation to facilitate societal and economic change. Shared Living is a suitable response to current household formation and housing demand particularly having regard to the proximity of Connolly Hospital, the Dublin Enterprise Zone and Blanchardstown Town Centre to the site which comprise a significant employment base, in addition to the proximity of the site to Castleknock Train Station providing access to other employment locations. We note that the subject site is located within a central and accessible urban location as defined in the *Apartment Guidelines, 2018* as the site is located within 15 No. minutes or 1,500 metres walking distance of Connolly Hospital, in addition to

other significant employment locations. The subject scheme is therefore fully in accordance and consistent with the standards set out in the *Apartments Guidelines, 2018*.

In addition to the Shared Living Report and Statement of Consistency, a summary of compliance with the *Sustainable Urban Housing: Design Standards for New Apartments, 2018* is discussed below.

*Table 5a (within SPPR9)*

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

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

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

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

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

*Table 5b (within SPPR9)*

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

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

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

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



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

We note that the size of the rooms containing a common kitchen facility were considered acceptable by An Bord Pleanála as no condition was attached regarding the increase of these room sizes. The increase only related to the other specific living/library areas on the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> floors. Having regard to this decision, the following living/kitchen/dining room sizes were granted at Eblana Avenue at each floor level (which includes the increased size of the living/library rooms required by condition):

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

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

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

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

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

In addition, the scheme provides additional communal amenity spaces at ground, basement, third and fourth floor levels to encourage social integration between residents in line with Section 5.17 of the Guidelines:

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

SPPR7 defines resident amenities as:

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

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

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

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

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

Based on the provision of 210 No. bedspaces, this equates to the provision of 4.4 sq m of amenity space per Shared Living bedspace. It is considered that the provision of 4.4 sq m of amenity space per resident in addition to the communal living/kitchen/dining spaces outlined in Section 3.1 will provide a high quality living environment for the Shared Living residents.

In addition to communal living/kitchen/dining spaces and internal and external amenity spaces proposed, the scheme provides resident facilities listed below:

<ul style="list-style-type: none"> <li>• Launderette (33.7 sq m)</li> <li>• Linen Room (25.5 sq m)</li> <li>• Bin Store (40.7 sq m)</li> </ul>	<ul style="list-style-type: none"> <li>• Bicycle Storage (254 No.)</li> <li>• Common WC/Stores (13.8 sq m)</li> </ul>
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Furthermore, intangible resident facilities in the form of Spike Global software will be provided to occupants of the development that will support everything from access control, logging and tracking facilities issues, to clubs, events and building a cohesive community through engagement and social interaction.

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

### 2.1.3 Applicant Response (iii)

**Further consideration of the documents as they relate to the principle of Shared Accommodation at this location having regard to the suitability of this location for Shared Accommodation with regard to accessibility and connections to employment centres and community facilities. Comprehensive information regarding the nature of the proposed use should be submitted to facilitate assessment of this issue including details of the occupation, operation and management of the scheme:**

In response to (iii), we highlight that there are a multitude of employment opportunities in close proximity of the application site, many of which would have employees that would greatly benefit from the option of Shared Living accommodation. The short–medium term accommodation is predominately targeted, interalia, at graduates and young workers who may not have the financial means to purchase their own home or indeed, may be at a stage in life where they have no desire to do so, and employees on short-medium term contracts. The option of Shared Living presents an easy solution in terms of renting high quality and suitable accommodation.

Thornton O’Connor Town Planning have set out in a comprehensive *Justification Report* that the proposed Shared Living Development is suitable for this location having regard to:

- Demand for Accommodation Generated by Employees of Connolly Hospital Blanchardstown [employs in excess of 1,100 staff];

- Demand for Accommodation Generated by Families of Medium/Long Term Patients of Connolly Hospital Blanchardstown;
- Demand for Accommodation Generated by the Employees of the Dublin Enterprise Zone [comprises c. 16,920 employees];
- Demand for Accommodation Generated by the Employees of Blanchardstown Town Centre [employs c. 5,500];
- Demand for Accommodation Generated by the Employees of Intel, which is easily accessible to the subject site [comprises c. 11,000 employees];
- Accommodation Demands Generated by the National Aquatic Centre and National Sports Campus; and
- Demographical Analysis – Demonstrates Younger Age Profile in Local Area [38% of the population under the age of 24 in comparison to the national average of 35%].

We refer to Section 2.5 of the Planning Report which outlines that the site is located within easy cycling and walking distance of a wide range of employment locations, community facilities and services in the general area which will serve the needs of the future residents. We note that the subject site is located within a central and accessible urban location as defined in the *Apartment Guidelines, 2018* as the site is located within 15 No. minutes or 1,500 metres walking distance of Connolly Hospital, in addition to other significant employment locations. We note that Blanchardstown Town Centre and Blanchardstown Main Street are located c. 1.5-1.7 km and c. 800 m respectively from the subject site which provide excellent employment opportunities and facilities and services for residents to utilise.

In addition to the aforementioned reports, the application for the proposed Shared Living development comprising 210 No. bedspaces is supported by a number of reports as detailed in the application form.

Importantly, the subject site is located within a highly accessible location as defined in the *Apartment Guidelines*, in close proximity to Castleknock Train Station (c. 550 metres/7 No. minutes walking distance to the south-west of the site) and adjacent to multiple bus routes that pass close to the subject site providing access to Blanchardstown Town Centre, Dublin Enterprise Zone and Dublin City Centre for example. As such, the proposed development will promote sustainable modes of transports. Please see further detail provided within the Mobility Management Plan prepared by CS Consulting and the Planning Report and Statement of Consistency prepared by Thornton O'Connor Town Planning.

In relation to the final element of item (iii) which requires comprehensive information to be submitted regarding the nature of the proposed use including details of the occupation, operation and management of the scheme, we note that a Niche Living Operation Plan has been prepared by the Applicant and is enclosed separately as part of this planning application.

## 2.2 Item No. 2 of the Opinion – Residential Amenity of Shared Accommodation Units

An Bord Pleanála stated the following:

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

### 2.2.1 Applicant's Response

As noted previously at Section 2.1.2, a recent decision by An Bord Pleanála to grant permission for a Shared Living Scheme at the Old School House, Eblana Avenue, Dún Laoghaire, Co. Dublin [ABP Ref. ABP-304249-19] has informed the layout of the proposed Shared Living scheme at the subject site, particularly in relation to the provision of communal living/kitchen/dining spaces.

Thornton O'Connor Town Planning have prepared a *Shared Living Report* to accompany the application detailing the scheme's compliance with Table 5a and 5b of the Guidelines which specifically addresses the provision of facilities and amenities in Shared Living accommodation.

Subsequent to the pre-application consultation meeting with An Bord Pleanála, we note that the provision of communal living/kitchen/dining space on each floor, overall amenity space and resident facilities has substantially increased ensuring that residents are provided with a high-quality living environment. We note the following changes (in summary) have been incorporated in this regard:

- Additional communal living/kitchen/dining room space has been provided at all floor levels which significantly increases the quantum of communal space available for residents to utilise;
- A communal /kitchen/dining room has been introduced at first and second floor levels overlooking the park providing passive surveillance;
- An additional external terrace has been provided at third floor level for residents to utilise;
- Cinema room has been increased from 50 sq m to 85 sq m; and
- The gymnasium has relocated to the rear of the scheme at ground floor and now overlooks the park to the north providing an active frontage (originally adjacent to the lounge/reception at ground floor).

In addition, as discussed in Section 2.1.2 of this Response, resident support facilities have been provided as follows:

- Launderette (33.7 sq m)
- Linen Room (25.5 sq m)
- Bin Store (40.7 sq m)
- Bicycle Storage (254 No.)
- Common WC/Stores (13.8 sq m)

We note that the cooking facilities provided in each suite, although high-quality, are considered to cover the basic needs of the future residents and are functionally limited i.e. a 2 ring hob, tea/coffee facilities and toaster. Future residents of the proposed Shared Living scheme will use the larger communal living/kitchen/dining rooms provided at each level to cook full meals due to the limited functionality and usability of the cooking facilities provided in-room. Research carried out by Bartra indicates that many typical future residents will purchase ready meals or will have meals subsidised at their place of work. However, it is important to provide the option of space for cooking at each level. The use by guests of the living/kitchen/dining rooms at each floor level will encourage interaction with other residents in the spirit of the 'Shared Living' concept.

We finally note that laundry facilities are not provided in each individual suite and therefore the Shared Living residents will be required to utilise the launderette provided at basement level, further encouraging social interaction.

### 2.2.1.2 The Benefit of a Non-Cluster Format

The *Apartment Guidelines, 2018* clearly sets out that a cluster-type format is just '**one format**' of Shared Living. Bartra's research has confirmed that a cluster format is not a preferred solution for working adults who have indicated a preference for enhanced private amenity.

As forerunners on this new tenure of accommodation, Bartra have extensively researched this model of residential accommodation and have designed a model that in their opinion provides the optimum accommodation solution for the future occupants of the Shared Living accommodation providing (i) in-room social sharing; (ii) on-floor sharing and (iii) community wide sharing.

Notwithstanding that the primary function of the suite is as a bedroom, the proposed scheme provides high quality in-room facilities to allow basic cooking in addition to communal living/kitchen/dining rooms at each level that are larger than typically provided in the cluster format. In fact, by not proposing the cluster format, this allows residents to interact with a larger number of people in the shared spaces rather than in a kitchen of a cluster where residents would become acquainted with only 4 or 5 No. residents, often strangers. In this regard it is considered that the proposed arrangement expressly adheres to, promotes and facilitates the definition and concept of Shared Living.

It is noted further that the non-cluster format has been granted by An Bord Pleanála in the Eblana Avenue scheme in Dún Laoghaire [ABP Ref. ABP-304249-19], therefore this format has been accepted.

### 2.2.1.2 Response to Board Comment in Relation to the Provision of Resident Amenities

As previously noted, a *Shared Living Report* has been prepared by Thornton O'Connor Town Planning. We refer to Section 4.1 of that Report which demonstrates sufficient communal amenity spaces are provided within the proposed scheme, with particular emphasis on Table 5b in accordance with the granted scheme at Eblana Avenue. It is also highlighted that following the pre-application consultation with An Bord Pleanála, additional communal living/kitchen/dining spaces have been provided throughout the scheme.

This information is all detailed further and extensively in the Shared Living Report that accompanies this application.

We reiterate that the format of the proposed Shared Living scheme has been accepted by An Bord Pleanála in their Decision to Grant Permission for a Shared Living scheme at Eblana Avenue, Dún Laoghaire.

### 2.3 Item No. 3 – Impacts on the Visual and Residential Amenities of the Area

An Bord Pleanála stated the following:

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

#### 2.3.1 Applicant's Response

The Applicant and Design Team have taken the comments of An Bord Pleanála and Fingal County Council into consideration in the preparation of the final design. We note that Todd Architects have prepared a comprehensive Design Statement detailing changes to the elevational treatment of the development from that submitted at the consultation stage. CGIs and photomontages have been prepared by 3D Design Bureau, in addition to a Landscape and Visual Impact Assessment prepared by The Big Space Landscape Architects.

We highlight that the following principal key design changes have been incorporated into the design of the proposed scheme:

- The proposal submitted at pre-application stage comprised 223 No. single occupancy shared living suites. The development now proposed provides 198 No. suites but has incorporated 12 No. larger double occupancy suites to allow choice in tenure for future residents providing a total of 210 No. bedspaces (182 No. single occupancy rooms, 4 No. accessible rooms and 12 No. double occupancy rooms);
- The building has been set back at second floor level by an additional 6.63 m and at third and fourth floor levels by an additional 3.43 m from the rear of properties along Talbot Court to the south-east;
- An access has been provided from ground floor level of the building to the park at the rear of the site and an additional second access has been provided external to the building

(both on the north-eastern boundary) providing residents with an additional opportunity to utilise existing amenity space in the area;

- Additional living/kitchen/dining room space has been provided at all floor levels which significantly increases the quantum of communal space available for residents to utilise;
- A living/kitchen/dining room has been introduced at first and second floor levels overlooking the park providing passive surveillance;
- An additional external terrace has been provided at third floor level for residents to utilise;
- The cinema room has been increased from 50 sq m to 85 sq m; and
- The gymnasium has relocated to the rear of the scheme at ground floor and now overlooks the park to the north providing an active frontage (originally adjacent to the lounge/reception at ground floor).

The changes have resulted in the number of bedspaces reducing from 223 No. bedspaces (223 No. single occupancy suites) to 210 No. bedspaces (182 No. single occupancy rooms, 4 No. accessible rooms and 12 No. double occupancy rooms). The provision of double occupancy rooms into the scheme will allow a choice in tenure for future residents. Each of the changes are discussed in further detail at Section 4.2.1 of the Planning Report prepared by Thornton O'Connor Town Planning.

## 2.4 Item No. 4 – Parking, Traffic and Transport

An Bord Pleanála stated the following:

*'Further consideration of the documents as they relate to parking, traffic and transport, having regard to the proximity of the site to Castleknock train station and to the availability of other public transportation services in the area. Further consideration of the vehicular, cycle and pedestrian connections to the Old Navan Road and the pedestrian connection to the adjoining public open space. The further consideration of this issue may require an amendment to the documents and/or design proposal submitted relating to density and layout of the proposed development.'*

### 2.4.1 Applicant's Response

We refer to the Justification Report prepared by Thornton O'Connor Town Planning which provides an in-depth and comprehensive rationale for the provision of a Shared Living scheme at this location. The scheme provides 254 No. bicycle parking spaces including 12 No. bleeper bike spaces, in addition to 2 No. car share spaces. Furthermore, we reiterate that Castleknock Train Station is located c. 7 No. minutes walking distance to the south-west of the site and the site is located adjacent to multiple bus routes that pass close to the subject site providing access to Blanchardstown Town Centre and Dublin City Centre for example.

We note that the recent decision relating to the Shared Living scheme at Eblana Avenue, Dún Laoghaire provided no private car parking for residents beyond 1 No. car share space and 1 No. disabled parking space. The site in Dún Laoghaire is located in proximity to employment locations, rail and bus services in addition to other facilities and services similarly to the subject site in Blanchardstown. Therefore, the provision of zero private car parking spaces and 2 No. car share parking spaces is considered acceptable at the subject site.



We draw the attention of the Board to the Mobility Management Plan, the Traffic and Transportation SHD Statement and the CS Consulting Response to Item No. 6 of An Bord Pleanála's Opinion both prepared by Cronin Sutton Consulting Engineers.

We note that CS Consulting's Response to Item No. 6 of An Bord Pleanála's Opinion enclosed with this Application sets out the following in relation to pedestrian facilities in the area:

*'Existing pedestrian facilities in the vicinity of the development site are of good quality. Raised footpaths and public lighting are in place along the Old Navan Road and surrounding streets. Signalised pedestrian crossings are provided at the nearby Navan Road, providing a safe pedestrian route north from the development site across the N3 towards Connolly Hospital in approximately 11 minutes.'*

Please also refer to the Material Contravention Statement which sets out in detail a photographic survey of the two pedestrian routes to the Hospital.

Therefore, the positioning of an accommodation option just an 11 No. minute walk from the employment node presents a practical and sustainable accommodation option to address an identified urban housing need.

In relation to the pedestrian connection to the public open space to the north (the public park), an access has been provided from ground floor level of the building and an additional second access has been provided external to the building (both on the north-eastern boundary) allowing easy access to the public park and providing residents with an additional opportunity to utilise this existing amenity space in the area. The scheme also provides passive surveillance of this park from the gymnasium at ground floor level and the newly introduced communal living/kitchen/dining rooms provided at first and second floor levels.



### 3.0 STATUTORY CONSULTEES

As requested, the Applicant has issued a copy of the application documentation to the following Statutory Consultees:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority

#### 4.0 RESPONSE TO SPECIFIC INFORMATION REQUIRED

This section will provide a response to the specific information requested by the Board in their Opinion, issued on 19<sup>th</sup> December 2018 which states the following:

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

#### 4.2 Item No. 1 – Proposed Covenant or 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. There shall be a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residents units are sold or rented separately for the period (Your attention is drawn to the provisions of Specific Planning Policy Requirement 7 of the Sustainable urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2018).'*

##### 4.1.1 Applicant's Response

Bartra intend to build, operate and actively manage the Shared Living Accommodation under the 'Niche Living' trading name. Nonetheless, a covenant/legal agreement as prepared by the Applicant, Bartra Property (Castleknock) Limited is enclosed with this application.

#### 4.2 Item No. 2 – Design Rationale

*'Design rationale for the scheme to demonstrate a high quality of residential amenity for residents, to address the requirements of sections 5.15, 5.16, 5.17, 5.23 and SPPR 9 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018.'*

##### 4.2.1 Applicant's Response

As detailed above, the Applicant has made significant amendments to the scheme further to the receipt of the Opinion from An Bord Pleanála, reducing the scale, massing and height, which has reduced the number of bedspaces from 223 No. bedspaces (223 No. single occupancy suites) to 210 No. bedspaces (182 No. single occupancy rooms, 4 No. accessible rooms and 12 No. double occupancy rooms) which will provide a choice in tenure for future residents.

Further to this, Todd Architects have used two contrasting external materials to articulate the different volumes (clay facing brick and a dark self-coloured cementitious render)

ensuring that the scheme provided will be of high quality and can be successfully assimilated into its surrounding context.

As stated above at Section 2.2.3 of this document, Bartra has carried out extensive research of Shared Living Models internationally concluding that the proposed layout as being optimum. Furthermore, we note that An Bord Pleanála have recently granted permission for a Shared Living scheme at Eblana Avenue, Dún Laoghaire [ABP Ref. ABP-304249-19] which has informed the layout of the proposed development.

In response to Sections 5.15, 5.16, 5.17, 5.23 and SPPR 9 please refer to the standalone Shared Living Report prepared by Thornton O'Connor Town Planning which specifically addresses the Apartment Guidelines.

#### 4.3 Item No. 3 – Potential Impacts on Visual and Residential Amenity for Neighbouring Residents

*'Photomontages, cross sections, visual impact analysis, shadow analysis and landscaping details to indicate potential impacts on the visual and residential amenities of Talbot Downs, Talbot Court and Old Navan Road and on the wider area, to include 3D visualisation of the scheme.'*

##### 4.3.1 Applicant's Response

The following has been prepared in response to this item:

- Photomontages and CGIs prepared by 3D Design Bureau demonstrating the high quality design of the scheme;
- Landscape and Visual Impact Appraisal prepared by The Big Space Landscape Architects which demonstrates positive results concluding that *'given the changes that are taking place in national policy and within the immediate environs, the magnitude of change which would arise from the proposed development is low'*;
- Shadow Analysis prepared by 3D Design Bureau which demonstrates that no prolonged material impacts will occur; and
- Landscaping details provided with the Landscape Design Report and Masterplan by The Big Space Landscape Architects which demonstrates the high-quality landscaped courtyards and external third floor terrace provided in the scheme.

Further to the above, we re-iterate that the subject site has an extant permission for the construction of 38 No. apartments in 4 No. blocks. We note that a partial additional floor level has been proposed at the subject site from that granted at the site in 2017. However, this additional floor level relates only to the centre of the site in the form of a narrow strip and therefore, it is our professional planning opinion that no adverse impact will occur as a result of this additional floor area (LVIA and Daylight/Sunlight Analysis enclosed demonstrate that no material impacts will occur). We highlight that the additional height is a direct response to the *Building Height Guidelines, 2018* which states that:

*'there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.'*

#### 4.4 Item No. 4 – Tree Survey and Arboricultural Assessment and Landscaping Proposals

*'Tree Survey, Arboricultural Assessment and landscaping proposals to address (i) impacts on existing trees at the site and in its vicinity; (ii) the quantity, type and location of all proposed hard and soft landscaping; (iii) boundary treatments; (iv) The provision of a high quality public realm for residents of the scheme as a contribution to the amenities of the area and (v) The interaction with adjoining public open space including clarification of any pedestrian connection to same. The proposed landscaping scheme shall be integrated with parking, roads and access proposals and detailed SUDS measures.'*

##### 4.4.1 Applicant's Response

- (i) Please find enclosed separately a Tree Survey and Arboricultural Assessment prepared by the Tree File which address impacts on existing trees at the subject site and in the vicinity;
- (ii) As previously noted, landscaping proposals are included within the Landscape Plan and Landscape Report prepared by The Big Space Landscape Architects, demonstrating the high quality landscaped spaces provided within the scheme including the basement courtyard, the ground floor courtyard and the third floor external terrace;
- (iii) We note that Landscape Plan also sets out the boundary treatments which show that the site will be enclosed with a 1,800 mm plinth wall and railing on the north-eastern boundary and part of the north-west boundary, an 1,800 mm brick wall with capping along the north-western boundary adjacent to the ground floor courtyard and a 600 mm plinth wall along a small portion of the north-western boundary and the south-western boundary ensuring that these public areas within the scheme will be secure and safe for residents to enjoy;
- (iv) As noted in part (ii) the landscaping proposals demonstrate that high quality landscaped spaces are provided within the scheme ensuring that the public realm provided will offer a positive experience for residents; and
- (v) In relation to the pedestrian connection to the public open space to the north (the public park), an access has been provided from ground floor level of the building and an additional second access has been provided external to the building (both on the north-eastern boundary) allowing easy access to the public park and providing residents with an additional opportunity to utilise this existing amenity space in the area. The scheme also provides passive surveillance of this park from the gymnasium at ground floor level and the newly introduced living/kitchen/dining room provided at first and second floor levels.

#### 4.5 Item No. 5 – Daylight/Sunlight Analysis

*'Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development.'*

##### 4.5.1 Applicant's Response:

A Daylight/Sunlight Analysis has been prepared by 3D Design Bureau which is provided as a separate document enclosed with this application. The report considers daylight/sunlight

impacts on the properties to the north-west, east and south of the subject site and their respective external amenity areas.

Nos. 7 – 12A, 14 – 16 Talbot Court and Ashgrove Talbot Downs are located to the north-west and east of the application site respectively. The daylight/sunlight analysis demonstrates that the proposed development is in accordance with BRE Guidelines. The BRE guidelines recommends that for a garden or amenity to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. The proposed development will not have a noticeable impact on their amenity spaces or on the Vertical Sky Component (VSC) of existing windows of those properties.

Nos. 3 – 11 Old Navan Road are located to the south of the application site. The daylight/sunlight analysis has demonstrated that the VSC meets the guidelines in all instances and does not significantly impact on the existing VSC baseline.

3D Design Bureau carried out an analysis of the hours of sunlight to the proposed amenity areas. The analysis concluded that the basement courtyard and roof terrace at third floor meets the BRE guidelines recommended levels whilst the ground floor courtyard does not meet this guideline. The Daylight and Sunlight Analysis Report notes the following:

*'While it recognised that the level of sunlight in the ground level courtyard is not going to be favourable throughout the year the proposed scheme has been designed to ensure that this courtyard does receive good levels of sunlight during the summer months. This has been achieved by ensuring the portion of the building directly south of the courtyard is not as high as the portion of the building to the east and the courtyard is completely open to the west. The reduction of mass to the south allows for the sun to cast light over the block in the summer months when the sun is higher in the sky. The opening to the west allows for longer periods of sunlight during summer evenings as the days are longer. The shadow study for June 21<sup>st</sup> as illustrated on Pages 24 - 27 demonstrates that this will be the case. At the summer solstice, approximately half of the ground level courtyard will be capable of receiving sunlight from just after 10:00am until just after 19:30pm.'*

Therefore, the external amenity space provided within the scheme is considered acceptable and it has been demonstrated that excellent high-quality amenity space has also been provided at basement level and in the terrace at third floor level.

#### 4.6 Item No. 6 – Car and Cycle Parking Provision

*'Rationale for the proposed car and cycle parking provision with regard to the standards set out in Chapter 12 of the Fingal County Development Plan 2017-2023 in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, to include (i) evidence based data from comparable developments in similar geographical locations to justify the proposed car in cycle parking provision; (ii) details of car and cycle parking management measures and the provision of visitor parking and (iii) a Mobility Management Plan.'*

#### 4.6.1 Applicant's Response

Please find a document entitled 'Response to Item No. 6 of An Bord Pleanála's Opinion' prepared by Cronin Sutton Consulting Engineers which fully addresses each issue raised in Item No. 6. In relation to part (i) the document sets out that:

*'CS Consulting is aware of only one existing shared living development that is of sufficient scale, and in a suitable geographic location, to provide a comparison to the proposed development.'*

This comparable development is The Collective at Old Oak in London. The document concludes that:

*'the Collective at Old Oak has been in operation since mid-2016, with a similar car and bicycle parking provision to that of the proposed development; this in itself supports the viability of the proposed development's car and bicycle parking provision.'*

This document also notes that An Bord Pleanála have recently granted permission for a Shared Living scheme on Eblana Avenue, Dun Laoghaire which did not provide private parking for residents beyond the 1 No. disabled parking space and 1 No. car share parking space provided. Similar to this development, the Eblana scheme was adjacent to rail and bus services that provided links to the city centre and other orbital areas of the city. Therefore the provision of 2 No. car club spaces for the residents at the subject site is considered acceptable having regard to its sustainable location in proximity to significant employment locations, public transport such as buses and Castleknock train station in addition to a wide range of services and facilities.

In relation to part (ii), the document sets out a justification and rationale for the car and cycle provision provided within the scheme. The document notes that:

*'the only car parking to be provided is in the form of 2 No. residential car club spaces, reserved for shared vehicles...Should unauthorised use of these spaces by others become a problem, the development's Management Company shall make use of appropriate management and/or enforcement options to prevent this; these may include access control (e.g. collapsible bollards), vehicle clamping, or vehicle towing.'*

The document further notes that:

*'visitor car parking is not included in the development, as a Demand Management approach has been adopted with the aim of preventing excessive and unnecessary vehicular trips to and from the site. It is envisaged that all visitors to the development will avail of the good public transport services described in the Mobility Management Plan.'*

In response to part (iii) Cronin Sutton Consulting Engineers have prepared a detailed Mobility Management Plan which has been submitted with the application.

#### 4.7 Item No. 7 – Site Specific Flood Risk Assessment

*'A Site-Specific Flood Risk Assessment to clarify the extent of the development located in any Flood Zone.'*

##### 4.7.1 Applicant's Response

Cronin Sutton Consulting Engineers have prepared a Site Specific Flood Risk Assessment enclosed with this application, which demonstrates no risk of flooding having regard to the location of the site in Flood Zone C.





## 5.0 CONCLUSION

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the items raised in An Bord Pleanála's Opinion. We submit that the proposed Shared Living Development at Brady's Public House, Old Navan Road represents the proper Planning and Sustainable Development of the currently underutilised site.

## Appendix A: Email from Fingal County Council dated 23<sup>rd</sup> July 2020

FW: Blanchardstown Urban Framework Plan - Message (HTML)

File Message Help Acrobat Tell me what you want to do

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Quick Steps

Move Actions

Assign Policy Mark Unread Categorize Follow Up

Translate Read Aloud Zoom Send to OneNote Insights

### FW: Blanchardstown Urban Framework Plan

**Conor Doyle**  
To: ● Patricia Thornton

You replied to this message on 23/07/2020 15:57.

↩ Reply ↩ Reply All → Forward

Thu 23/07/2020 15:57

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**From:** Deirdre Fallon <[Deirdre.Fallon@fingal.ie](mailto:Deirdre.Fallon@fingal.ie)>  
**Sent:** 23 July 2020 15:52  
**To:** Conor Doyle <[conor@towntownplanning.ie](mailto:conor@towntownplanning.ie)>  
**Cc:** Derek Kavanagh <[Derek.Kavanagh@fingal.ie](mailto:Derek.Kavanagh@fingal.ie)>; Ann Murphy <[Ann.Murphy@fingal.ie](mailto:Ann.Murphy@fingal.ie)>  
**Subject:** FW: Blanchardstown Urban Framework Plan

Dear Conor,

I refer to your query below. The preparation of the Blanchardstown Framework Plan is not on the current work programme for the Planning and Strategic Infrastructure Department. At the moment, there is no indicative timeframe available for its preparation.

Regards,

Deirdre Fallon  
 Senior Executive Planner | Fingal County Council | Planning & Strategic Infrastructure Department  
 County Hall | Main Street | Swords | Co. Dublin | Eircode: K67X8Y2  
 T: +353 (0)1 890 5849 | E-mail: [deirdre.fallon@fingal.ie](mailto:deirdre.fallon@fingal.ie)

**Comhairle Contae**  
**Fhine Gall**  
 Fingal County  
 Council

