

**Statement of Response
to An Bord Pleanála
Opinion**

Proposed SHD Planning Application

**At Glenamuck Road North,
Carrickmines,
Dublin 18**

**On behalf of
Moran Park Homebuilders Ltd.**



April 2022



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1 Introduction

Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Statement of Response on behalf of **Moran Park Homebuilders Ltd, 19 Fitzwilliam Square, Dublin 2, Do2 CD40**, for a Strategic Housing Development (SHD) proposal relating to a 118 no. residential units development at Glenamuck Road North, Carrickmines, Dublin 18.

This Statement of Response is lodged as an accompanying report for the subject proposal and should be read in conjunction with all plans and particulars submitted as part of the overall planning application.

This response has been prepared with direct input from:

- Moran Park Homebuilders - Applicant
- McGrane & Partners Architects - Design Architects
- Aramark – Aramark Property Management
- ARC Architectural Consultants - Visual Impact Consultants
- AWN Consulting - Waste Management, Hydrological and Noise Consultant
- B Fluid – Microclimate
- Brock McClure Consultants - Planning Consultants
- Waterman Moylan Engineers - Design Engineers
- Ronan McDiarmada - Landscape Architects
- Enviroguide - Ecologists
- Joe McConville - Arborist
- RM Breen Associates - Electrical Engineers
- Digital Dimensions - Daylight and Sunlight and CGIs

2 Requirement for this Statement

This report is a response to the issues raised by An Bord Pleanála following the pre-application consultation in respect of the proposed SHD (ABP Pre-Application Reference ABP-310772-21 refers).

An Bord Pleanála issued a Notice of Pre-Application Consultation Opinion on ‘Chigwell’ Pre-Application Request which stated the following:

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

The opinion sets out that 3 key issues should be addressed in the documents submitted with any application for permission in respect of the proposed development. These matters can be summarised as follows:

Item 1: Development Strategy

Item 2: Traffic and Transport

Item 3: Potential Impacts on Residential Amenities and adjoining lands

The opinion set out specific information that should be submitted with the application. Section 3 of this statement sets out a comprehensive Design Team response to the requested items.

In addition, pursuant to Article 285(5)(a) of the Planning and Development Regulations 2001 (as amended), the opinion issued by the Board, requested that the following authorities be notified in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority.
4. Relevant Childcare Committee

We can confirm that the prescribed bodies identified by An Bord Pleanála have been contacted and a full digital copy of the planning application currently under consideration has been furnished to the authorities referenced. We confirm that the digital copy was the preferred format for prescribed bodies of the formal strategic housing development planning application. Where required by the prescribed body a USB of the digital material has also been issued.



3 Response to Issues Raised

Pursuant to article 285(5)(b) of the Planning and Development Regulations 2001 (as amended), in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Regulations 2001 (as amended), the following specific information was requested:

1. Development Strategy
2. Traffic and Transport
3. Potential Impacts on Residential Amenities and adjoining lands

The opinion of An Bord Pleanála in relation to these matters and the response from the applicant are identified below.

3.1 Item 1: Development Strategy

An Bord Pleanála Opinion

“Further consideration and/or justification of the documents as they relate to the design strategy for the site in respect of:

- (a) The interface with the lands to the southeast and the development permitted under An Bord Pleanála Reference No. PL.06D.304995, the public realm at Glenamuck Road North and the interface with adjoining lands, as they relate to the design and layout of the proposed development and the desire to ensure that the proposal provides a high quality, positive intervention at this location. Particular regard should also be had to creating suitable visual relief in the treatment of elevations and interface with adjoining lands. An architectural report, urban design statement and additional all CGI's/Visualisations should be permitted with the application.”*

Response:

Block C of this subject application is the only building which impacts the proposed development of the lands to the southeast granted under planning reference PL.06D.304995. The design of this block has been carefully considered and the visual impact reduced by extensive stepping back of the three upper floors. The height of the southeast boundary is reduced to four stories over ground with the 4th, 5th and 6th floors having substantial setbacks.

The site slopes from north to south at this location and this difference in levels allows for the 6th floor at the northern elevation to incorporate an additional floor with south-eastern side as illustrated in the application documentation.

To further reduce the impact on the adjoining properties and in response to the An Bord Pleanála's comments Block C has been redesigned and moved a further 4 meters from the eastern boundary hence increasing the separation from the houses in Brennanstown Vale to distances varying from 40.6 meters to 48 meters at the point where the building is closest to the eastern boundary. The height is restricted four stories rising to six stories with setbacks at the 5th and 6th floors.

Interface with Public Realm at Glenamuck Road North

The block which relates to the public realm at Glenamuck Road is Block A. This block extends to 7 stories which is reduced slightly by being set into the fall of the ground which extends to 3 meters from north to south.

There are no residential properties on the same plane as this block. Tullybeg and Stafford Lodge to the north and south of Block A are set back 24 meters and 42 meters respectively from Glenamuck Road. Both these houses address the central open space created between Blocks A and Block B. The distance between Block A and Tullybeg at the closest point is 20.6m. This separation being further reinforced by the presence of a substantial copse of trees and a tree lined avenue giving access to Chigwell House.

Similarly, the impact on Stafford Lodge due to it 's set back from Glenamuck Road of 42 meters and its distance from Block A of 23.3 meters is not considered to be significant. This fact is further supported by the sun lighting and shadow diagrams which support this submission.



Block A faces Carrickmines Tennis Club situated to the west of Glenamuck Road. The element of which it faces is the car park. As a result of the location of the adjoining residential properties of Tullybeg, Stafford Lodge and the element of the car park of the Tennis Club, it is submitted that there is no adverse impact on the public realm at this location.

Likewise, the other residential development at Pavilion Gate is located to the northwest of the subject site and is visually separated from the proposed development by a copse of mature trees. Hence, it is submitted that there is no diminution of the public realm as it effects these properties.

Careful consideration has been given to the positioning of Block A and B to create the public open space which is so positioned to provide an open vista opposite Stafford Lodge to the south and Tullybeg to the north hence enhancing the public realm at this location and providing an enhanced public realm for both the existing residential properties and for the future occupants of the proposed development.

Interface with Other Adjoining Residential Properties

The other properties interfacing with the proposed development are Chigwell House and Brennanstown Vale.

Impact on Chigwell House

Block B is the closest block to Chigwell House. In the current layout we have taken into account the comments of the Bord and have redesigned Block B and positioned it further to the west hence increasing the separation distances from Chigwell House.

On the attached map the previous position is shown by the dashed orange lines while greater separation distances are shown both from the northern boundary and Chigwell House.

We would submit that, due to the separation distance and the tree lined entrance drive, the proposed development will now have minimal visual impact on this property.

In addition to the redesign of Block B, all windows on the northern elevation have been omitted so as not to affect the future development potential of the adjoining lands to the north of the subject site.

Impact on Brennanstown Vale

Block C is the only block which could be considered to impact on Brennanstown Vale. In the redesign of this block, again, considering the comments of the Bord, we have reduced the footprint of the building on the eastern side and moved it further away from the eastern boundary with Brennanstown Vale.

This is illustrated on the attached site plan on which the previous position is shown by a dashed orange line. Separation distances vary from 41.7 meters to 48.0 meters at the nearest points while upper floors are set back to reduce the visual impact.

This Block C has also been moved further away from the southern boundary and significantly stepped back at levels 4, 5 and 6 to eliminate any adverse impact on the proposed development at Carricáil (PL.06D.304995) - which is also in the same ownership as the applicant of this submission.

Variation in elevation to provide visual relief and variety in materials.

The elevation of all blocks has been redesigned to provide variation in the visual plane by the creation of strong balcony elements and a variety of material consisting of brick, plaster render, stone cladding and zinc metal cladding to the top floor. This redesign is illustrated by the attached CGI's and site sections.

We further respond to the above comments by way of our comments and illustrations in the Design Strategy, Heights, Density and Mix sections of this Design Statement.



- (b) *“A contextual layout plan which indicates the layout of adjoining developments, photomontages and cross sections at appropriate levels, including details of how the proposed development interfaces with contiguous uses/lands and adjoining roads.”*

Applicant Response:

The enclosed site layout plans show the interface between the contiguous land uses and adjoining lands prepared by McGrane Architects.

- (c) *“Detailed rational/justification regarding the suitability of the proposed site to accommodate the proposed height, density and housing mix with regard to the provisions of the Dun Laoghaire Rathdown County Council Development Plan 2016-2022 and relevant national and regional planning policy including the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’); The Design Standards for New Apartments. Guidelines for Planning Authorities’ (2020) and the ‘Urban Development and building Heights – Guidelines for Planning Authorities’ (2018).”*

Response:

Height

We have provided a detailed justification for the proposed heights of the individual blocks in relation to their interaction with the adjoining residential and other properties in the with application. This application is accompanied by an Architectural Design Statement prepared by McGrane Architects, which includes a detailed section relating to the height rationale and design strategy for the proposed development. The Design Statement reflects the further consideration undertaken by the design team in relation to the height and scale of the development.

The Design Statement details the consideration which was undertaken to inform the design of the development in terms of its scale, proportions, and relationships between the various individual blocks proposed.

This proposal envisages building heights varying from 6 to 7 storeys. We recognise that the Dun Laoghaire Rathdown County Council Development Plan 2016-2022 seek a maximum height of 6 stories. We would ask the Bord to allow our proposal of 6-7 stories for the following reasons.

1. The site has a fall of 3 meters (1 storey) from north to south and in many instances our building complies with this height requirement on the northern elevation but increases to 7 storeys at the southern elevation by virtue of the fall in level across the site. Which provides for the opportunity of an additional floor.
2. In addition, setbacks are provided in all cases at the 5th floors setting back to the 6th and 7th floors hence, significantly reducing the blocks visual impact in all cases. Block C at its interface with the southern boundary interfacing with the permitted development at Carricáil is reduced to 4 floors at parapet level with significant setbacks at floors 5 and 6.

While a full 6 storey building would comply with the requirements of the current Dun Laoghaire Rathdown County Council Development Plan 2016-2022 it is suggested that the proposed variation of height with setbacks to all floors over 4 and 5 storeys creates a lesser visual impact than a 6 storey building without setbacks which would comply with the Development Plan.

The nearby Ballyogan & Environs states in the building height rationale that “[i]n the larger development sites such as Stepside, Carrickmines, Cherrywood, Sandycroft and along the N11 corridor heights greater than six storeys have been permitted”. The within proposal adheres to this key principle ensuring that the massing and scale of the project relates and enhances the existing Carrickmines neighbourhood.

It is submitted that the heights proposed are robustly justified and reflect a logical design rationale which was informed by a detailed appraisal of the site context. The CGIs and photomontages prepared and



submitted with the application clearly demonstrate the effective use of variations in height and scale across the site, delivering a pleasing composition across the site. The application is also accompanied by a comprehensive suite of visualisations / photomontage images prepared Digital Dimensions. In total, 10 views are provided which allow for the assessment of the visual impact and appearance of the proposed development in its context.

We urge the Bord to approve this proposal on the grounds that it has less visual impact than a building with a parapet height of 6 storeys. Further information of the proposed height and justification for same is provided throughout the planning application documentation.

Density & Housing Mix

The proposed density of 118 apartments on a site of 0.74Ha represents a density of 159 units per hectare which, due to the proximity of the site to quality, high capacity and frequent, transport modes and leisure facilities and employment opportunities, complies with the government policy on sustainable development and efficient use of land.

The 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities', identify a number of locations suitable for apartment development primarily 'Intermediate Urban Location' and 'Central and/or Accessible Urban Locations.'

Central and/or Accessible Urban Locations are defined as follows:

"Such locations are generally suitable for small-to-large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- Sites within walking distance (i.e. Up to 15 minutes or 1,000 – 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions:
- **Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban transport stops (such as DART or LUAS):**
- Sites within easy walking distance (i.e. up to 5 minutes of 400-500) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services." **(Emphasis added)**

The subject site falls into the category of "Accessible Urban Locations" given that the site is well served by high-capacity public transport and located within 500metres of the Carrickmines Green Luas Stop. In addition to the proximate Luas Stop, the site is also located in close proximity to bus routes operating along Glenamuck Road. The 63-bus route provides services from Dun Laoghaire to Kilternan, with c.20 minute frequencies. Glenamuck Road is well served by existing pedestrian and cycle facilities.

The site is well placed to absorb a high-density development which is appropriately scaled and designed in the context of its urban surroundings, whilst introducing an element of building height on the M50 corridor, responding to the scale and width of the adjacent roadway and providing for an appropriate sense of enclosure along adjacent routes.

The proposals make optimum use of this underutilised area of land which is zoned for residential development, under which residential development and other associated uses are permitted in principle and open for consideration, the proposals are therefore considered compatible with adjacent existing land use. The scheme integrates appropriately with the urban environment and enhances public open space provision and pedestrian permeability without compromising the amenity of existing adjacent properties.

In addition, we believe a proposed mix of unit types and sizes are incorporated into the development proposal. Notably, a residential mix – 34 x 1-bed units (29%), 76 x 2-bed units (64%) and 8 x 3-bed units (7%) – is proposed to provide an opportunity for an infusion of new residents from varying economic levels into the area and will add to the choice of residential type available. The proposed development will counter balance the current preponderance of large houses on large sites resulting in greater efficiency in land use and infrastructural facilities.

This mix is considered appropriate and in line with ministerial guidance contained within the 2020 Apartment Guidelines. Given the specific requirements of the development plan in relation to mix, the Material Contravention Statement enclosed herewith outlines further details on the mix proposed, vis-à-



vis the Development Plan requirements. We further respond to the above by way of our comments and illustrations in the Density and Mix sections in the Architectural Design Statement as prepared by McGrane Architects which accompanies this application.

Further information of Density and Mix, including the rationale and justification for same, is provided throughout the planning application documentation.

- (d) ***“In addition to the consideration of local statutory policy and national policy guidelines, particular regard should be had to demonstrating that the proposal satisfies the criteria set out inter alia in Section 3.2 and SPPR3 of the Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018). The applicant should satisfy themselves that the design strategy for the site, as outlined in red, provides the optimal outcome of the subject lands.”***

Response

The guidelines are designed to encourage the provision of an increased output of higher density apartment development particularly, in urban areas.

This site meets the criteria identified in the Guidelines in relation to ‘Central and/or Accessible Urban Locations’ as being suitable for high density apartment development located within walking distance of significant employment locations and within reasonable walking distance of high-capacity urban public transport services.

SPPR 3A of the Urban Development and Building Heights Guidelines 2018 requires applicants for planning permission to set out how the proposal complies with the “criteria above”. This refers to the Development Management criteria at Section 3.2 of the Guidelines.

In addition to the information set out below, a detailed response to the above is set out in section 10.11.3 of the Planning Report and Statement of Consistency prepared by Brock McClure Planning & Development Consultants.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/the Board, that the proposed development satisfies the relevant criteria. The said criteria, followed by the applicant’s response to same, is set out below to clearly set out for the Board that the current proposal qualifies as a site that can accommodate additional building height (for further information, see also the application documentation, including, inter alia, the Planning Report and Statement of Consistency and Material Contravention Statement submitted with this application) :

At the scale of the relevant city/town:

- ***“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.***

As evidenced throughout the planning application documentation, the site is well served by high capacity and frequent public transport, with the site located 150m from the Carrickmines Green Line Luas stop which provides a direct connection north to Dublin City Centre and beyond, and south to Brides Glen (last stop). The site is also well serviced by the M50 motorway, with the nearest junction located 400m to the southwest, and by cycle lanes/bus services on North Glenamuck Road. Specifically, we note that the bus stop is located 150m from the site with a service from Kilternan to Dun Laoghaire.

- ***Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.***

The scale of the proposed development is considered to integrate appropriately with its surroundings, whilst introducing an element of increased height, adjoining roads to define a strong urban edge to the M50 and the other adjoining streets at this important location.



The proposal is not located within an architecturally sensitive area, nor is there a requirement to protect views across this site. Public open space has been carefully positioned and designed to a high level of quality design and implementation to enhance the public realm. Space which forms the public realm has been located so that they are overlooked by apartments, thus ensuring the security of the public realm and the users of same.

The proposal will provide for a strong sense of place and a public realm which will be more comfortable and inviting for pedestrians due to improved enclosure, and permeability around and through the scheme. It should also be noted that the benefits offered by the proposal to the public realm have been identified, such as new pedestrian connections, a communal area (Block B), a new play area and significantly improved frontage along Glenamuck Road.

- ***On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape."***

Careful consideration has been given to the proposal in regard to how it addresses the existing surrounding development and local topography. The high quality design submitted provides an appropriate transition between the neighbouring sites, through the delivery of 4 storey height with a transition to 6 and 7 storeys at set back higher levels. The Daylight & Sunlight Assessments prepared by Digital Dimensions, confirms that there are acceptable levels of access to natural daylight and sunlight. Similarly, the detailed Wind and Microclimate Study also confirms that the proposal does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby building.

It is considered that the proposed development would make a positive contribution in terms of place-making – again through the provision of new pedestrian connections, a communal area (Block B), a new play area and significantly improved frontage along Glenamuck Road. The main open space, by virtue of its sense of enclosure and orientation, creates a strong sense of place, security and privacy for all residents of the development. This provides an open vista to the south across the proposed pen space with the result of enhancing its prospect and enjoyment of the proposed landscaped open space.

The proposed scheme presents in a series of new residential blocks which are focused on placemaking and a central area of open space. There is sufficient variety in scale and form of the Blocks through the use of a variety of building layouts, sizes and heights. Care has been given at height sensitive areas (along boundaries with Tullybeg, Chigwell, Stafford Lodge) to ensure there is no undue impact on established levels of residential amenity adjoining the site. The development creates visual interest at the site through a high quality design which responds to the surrounding pattern of development.

In this respect, the proposals are considered to be of an appropriate scale, height and massing to complement the existing urban form whilst successfully introducing a high quality element of architecture to the site, making optimal use of the strategic, prominent location.

At the scale of district/ neighbourhood/ street:

- ***The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.***

The proposed development will form views along the M50, Glenamuck Road North, positively contributing to its surrounding neighbourhood and streetscape by virtue of its context sensitive and carefully considered design. It will provide for high quality contemporary design at an appropriate location and make a significant positive contribution to the existing urban neighbourhood and streetscape at this location.

It is considered that the proposal introduces a high-quality development at an underutilised site within a setting which is swiftly developing and which is destined for significant planned further growth. The proposed development responds appropriately to the surrounding urban pattern and scale, with higher built elements situated along the M50 and Glenamuck Road North.



The proposal constitutes the sustainable development of these underutilised lands and will enhance the appearance of the site, providing integration with the existing context and enhancing the urban public realm at this location. This will add positively to the quality and aesthetic appearance of the area, allowing for vibrancy within the public realm, and building heights that avoid any sense of monotony or monolithic design.

- ***The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.***

Careful consideration has been given to ensure that a monolithic appearance is avoided. The design of the buildings and the materials used serve to express the architectural intent of the scheme. This is apparent from the design rationale submitted by McGrane & Partners Architects, which clearly sets out that a number of options were considered in design. The choice of materials would be of high quality, with stone cladding and brick combined with plaster finish – as indicated on drawings. Balcony features will be plastered and will include glass screens. Windows will be aluminium or Aluclad to provide a sustainable and high-quality finish and appearance. Entrance doors and screens will be of aluminium construction. Glazing will be double or triple-glazed to meet insulation standards. The cladding to the top floor of all blocks will be zinc finished metal cladding.

The layout and sitting of the development has been sensitively chosen to create an attractive new streetscape along surrounding routes, giving the area a more urban feel, and imbuing it with a greater sense of place. The buildings have been complemented by a high quality hard and soft landscaping scheme which further enhances the visual appeal of the proposal, as well as attracting public use and animation along the street frontages and within the internal open spaces.



Figure 7 - CGI of Open Space Area



Figure 8 - CGI of Open Space Area

- ***The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).***

The proposed development will significantly enhance the existing M50, which is a key thoroughfare in the area and for the city at large. It will provide for a high-quality contemporary development at an appropriate location and make a significant contribution to the existing streetscape.

The proposal introduces a development which is compatible with its land use zoning and adjacent residential development. The additional height proposed makes optimal use of an underutilised area of land which benefits from a strategic location. The layout of the residential blocks contributes to a sense of place and benefits from passive surveillance from the residential buildings.

As set out above, the proposal offers significant enhancement to the local public realm by way of new pedestrian connections, a communal area (Block B), a new play area and significantly improved frontage along Glenamuck Road. There is no inland waterway or marine frontage within the current proposal. We refer to the material from Waterman Moylan, included herewith, which provides for comment on flood risk.

- ***The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.***

Legibility through the site is delivered by way of a comprehensive landscape plan and specifically a series of permeable connections through the site and quality areas of open space. Open space is provided by one major centrally located open space between Blocks A & B and enclosed to the south with a glass rail hence, creating a sense of place and enclosure still allowing the space to benefit from the southerly aspect sunlight.

The central open space will be landscaped to the highest quality to provide a location semi-enclosed of natural beauty and tranquillity while the central open space is accessible to all residents. Two further formal open spaces are provided adjoining Blocks B & C. Pedestrian paths are also provided around Block A to integrate the lesser spaces surrounding this block with the central open space.

- ***The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.***

An appropriate mix of unit types and sizes are incorporated into the development proposal. Notably, A residential mix – 34 x 1-bed units (29%), 76 x 2-bed units (64%) and 8 x 3-bed units (7%) – is proposed to



provide an opportunity for an infusion of new residents from varying economic levels into the area and will add to the choice of residential type available. The proposed development will counter balance the current preponderance of large houses on large sites resulting in greater efficiency in land use and infrastructural facilities

At the scale of the site/building:

- ***The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.***

The proposed scale, massing and height of the development has been informed by the emerging built environment in the surrounding area. The development introduces a higher built environment which seeks to optimise the sites location and position on a key thoroughfare. The scale and height of the proposed residential blocks take cognisance of the surrounding urban form, tapering in at the 6th and 7th floor. This is seen to integrate successfully with the urban environment whilst introducing an element of height which effectively responds to the sites prominent location.

The Daylight & Sunlight Assessments prepared by Digital Dimensions, enclosed herewith, confirms that there are acceptable levels of access to natural daylight and sunlight. In this regard, it provides :

Daylight to Adjoining Properties

“There will be a minor reduction to some of the windows to the adjacent existing houses, but all retain a VSC in excess of 27% or are not reduced below 80% of their former value and there will be no perceived reduction in available daylight. The proposed development meets the requirements of the BRE Guidelines, and any impact will be negligible.” (Page 13)

Daylight to Permitted Development at Carricáil

“The proposed apartment is within the same ownership of the proposed development, has not been constructed yet and will not experience any reduction in daylight. All the rooms assessed considerably exceed the minimum recommendations for the Average Daylight Factor and will be well daylit. The proposed development meets the recommendations of the BRE Guidelines and BS8206 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting.” (Page 15)

Sunlight in Adjoining Residential Living Areas

“All windows assessed exceed the target values set out for sunlight. The proposed development meets the recommendations of the BRE guidelines.” (Page 16)

Sunlight to Adjoining Gardens

“All the amenity space to the neighbouring properties will retain 2 hours sunlight in excess of 50% of the amenity space. The proposed development will not reduce the existing availability of sunlight below 80% of the current levels.” (Page 18)

Daylight to Proposed Development

“100% of the rooms assessed exceed the minimum recommendations for the Average Daylight Factor and will be well daylit. The proposed development meets the recommendations of the BRE Guidelines and BS8206 Part 2:2008 Lighting for Buildings, Code of Practice for Daylighting’.” (Page 19)

Sunlight to Proposed Areas of Open Space

“The site has a variety of public and communal amenity spaces into the scheme. The BRE recommends that 50% of the area receive more than 2 hours of sunlight on the 21st of March and all three areas meet these criteria.” (Page 20)

Overall, it can be concluded that the scheme design is supported in terms of access to daylight and sunlight, with no significant impacts within the development or to adjoining dwellings.

- ***Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings - Part 2: Code of Practice for Daylighting’.***



The proposed development meets the recommendations of the BS 8206-2 2008 and BRE guidance document (2011) Site layout planning for daylight and sunlight. The proposed apartments were also assessed for daylight provision in accordance with EN17037:2018 and all the units exceed the minimum target levels.

The Daylight and Sunlight Analysis confirms that there are acceptable levels of access to natural sunlight available to surrounding properties and that overshadowing is minimised. The Vertical Sky Component or VSC percentage is protected as much as possible with some impacts to be expected with the requirements in relation to high density infill development types that are required for sites such as this. solutions.

- ***Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”***

All the units within the proposed development exceed the recommendations of the BRE guidelines for quality of Daylight. The bedroom and living space layouts have been optimised for daylight and sunlight. All the living spaces with a kitchen exceed the target ADF value of 2% and all the bedrooms exceed the target ADF value of 1%. The proposed amenity spaces will be bright and achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st March. This meets the recommendations of the BRE guidelines.

Specific Assessments

The guidelines set out that in order to support proposals at some or all of these scales, specific assessments may be required, and these may include:

- ***Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.***

A preliminary report has been prepared by BFluid and the following conclusions are identified:

- *“The wind profile around the existing development environment was built using the annual average meteorology data collected at Dublin Airport Weather Station. In particular, the local wind climate was determined from historical meteorological data recorded 10 m above ground level at Dublin Airport.*
- *The prevailing wind directions for the site are identified as West, South-East and West-South-West, with magnitude of approximately 6m/s.*
- *We retain that mitigation measures such as the use of landscaping on ground floor will be sufficient to ensure that the proposed Strategic Housing Development will be designed to produce a high-quality environment that is attractive and comfortable for pedestrians of all categories.*
- *Southwest corners of block A, B and C potentially experience high wind speeds. This wind speeds are not critical and can be further mitigated by the use of landscaping trees.*
- *High speeds are observed in the spaces between block B and C. These high speeds are due to funneling and recirculation effects and can be mitigated with the use of landscaping in these areas.*
- *Given the position of the development blocks, and the recommended landscape, critical wind speeds are not expected on footpaths of the proposed development blocks.*
- *The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings (page 59).”*
- ***In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.***



This SHD application is accompanied by an Ecological Impact Assessment, an EIA Screening Report and an AA Screening Report prepared by Enviroguide, which demonstrate that the proposed development does not have any potential to adversely impact on the biodiversity of the area (including on any bird or bats species). The proposed development, for the purposes of the above-mentioned criterion, is not located in proximity to sensitive bird and / or bat areas and/or will not have any adverse impact, having regard to the aforesaid relevant planning application documentation, on flight lines and /or collision risk.

- ***An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.***

Given the height and scale of the development proposed, it is not anticipated that the proposal will interfere with important telecommunications channels such as microwave links. The applicant endeavours to engage with a specialist to advise on this matter subject to a grant of permission.

- ***An assessment that the proposal maintains safe air navigation.***

In preparation of this planning application

In preparation of this planning application, the applicant has entered into discussions with the IAA who had no significant comment to make on the proposal. As identified in the appendix to the rear of this report, the IAA in their review dated 18th January 2022 concluded that:

“It is the observation of the Safety Regulation Division Aerodromes that based on the information provided, the proposed development appears to be located approximately 18.9km Southeast of Casement Aerodrome and 19km South East of the Threshold of Runway 34 at Dublin Airport. It is likely that only general observations would be issued during the planning process relating to the construction process and the notification of proposed crane operations with at least 30 days notification to the Authority.”

- ***An urban design statement including, as appropriate, impact on the historic built environment.***

A comprehensive Design Statement has been prepared by McGrane & Partners, enclosed herewith. This statement addresses the site context and proposed design in urban design terms and sets out in clear detail the design rationale for the current proposal submitted.

- ***Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.”***

We confirm that an Environmental Impact Assessment Screening Statement, Ecological Impact Assessment (EcIA) and an Appropriate Assessment Screening Report have been prepared by Enviroguide and are enclosed in the within application.

On the basis of the initial foregoing analysis, it is submitted that the current proposal can be positively considered by the competent authority. The site is well placed to absorb a high-density development which is appropriately scaled and designed in the context of its urban surroundings, whilst introducing an element of building height on the M50 corridor, responding to the scale and width of the adjacent roadway and providing for an appropriate sense of enclosure along adjacent routes.

The proposals make optimum use of this underutilised area of land which is zoned for residential development, under which residential development and other associated uses are permitted in principle and open for consideration, the proposals are therefore considered compatible with adjacent existing land use. The scheme integrates appropriately with the urban environment and enhances public open space provision and pedestrian permeability without compromising the amenity of existing adjacent properties.



3.2 Item 2: Traffic and Transportation

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

(a) Proposed works at Glenamuck Road North as proposed traffic management measures.

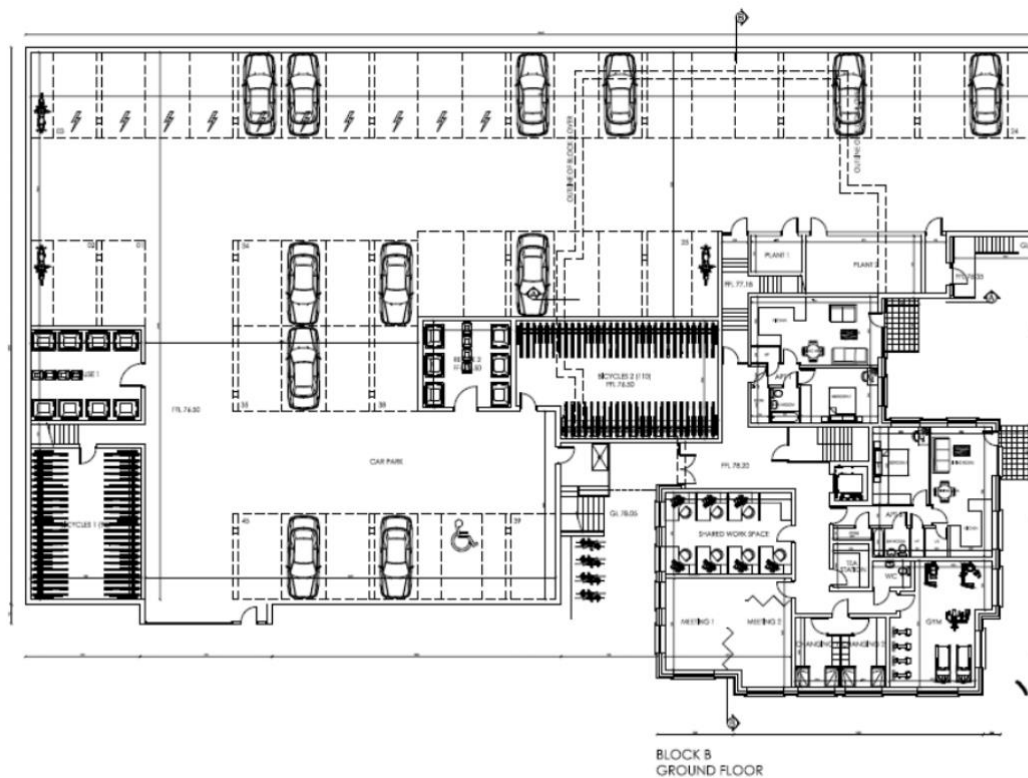
Response

A full and comprehensive Construction Traffic Management Plan and proposals shall be prepared by the appointed contractor for the works at Glenamuck Road North. These shall be agreed with the local authority Transportation, Roads and Maintenance departments as required, in advance of the commencement of works.

(b) Provide a justification for the level of car parking proposed. The justification should include an analysis of car parking demand taking account of the site’s location and the level of connectivity (by all modes) to services and employment.

Response

A justification for the level of car parking is supplied under the revised “Car Parking Strategy and Mobility Management Plan” submitted as part of the engineering planning submission package. Furthermore, the proposed development and number of car parking spaces proposed, is also considered in the Planning Report. A total of 103 no. car parking spaces are proposed for 118 no. residential unit. We note that 5% of all spaces (5 spaces) will be disabled parking spaces and 16.5% (17) will have electric power charging points. This is considered an exceptional provision.



Notwithstanding this, there is express provision within the Development Plan (Section 8.2.4.5) for reduced car parking standards for any development (residential or non-residential) in light of the proximity of the proposed development to public transport. For clarity, we can confirm the following distances to public transport:

- Luas – The site is situated approx. 150 m/1-minute walk from the Carrickmines Luas Line. The Luas provides regular services to Dublin City Centre.
- Bus – The site is directly served by an existing bus route running along the Glenamuck Road North. It is approximately a 150m walk from the proposed site entrance to the bus stops travelling both directions. The subject bus stops – which are located on Glenamuck Road North, are served by Route 63. This bus route connects Kilternan to Dun Laoghaire via different itineraries

Based on the above, it is our contention that there is provision made within the Development Plan to reduce car parking standards that apply to this particular site.

Notwithstanding the above, we note that the 2020 Apartment Guidelines generally encourage reduced standards of car parking, and the content of these Guidelines supersede Development Plan requirements. An assessment of the proposal against these Guidelines can be found within the Planning Report and Statement of Consistency and the Material Contravention Statement which accompanies this application.

The intention of the guidelines is to minimise, substantially reduce or wholly eliminate car parking for Central and/or Accessible Urban Locations. It is submitted that the subject sites are a prime location for this principle to be applied. The provision of car parking spaces is set out in the below table.

DLRCC Requirements	Apartment Guidelines	Parking Provided	Parking Ratio
1 space per 1-bed unit and 1.5 spaces per 2-bed unit (depending on design and location)	Parking provision minimised, substantially reduced, or wholly eliminated in certain circumstances.	103	0.87

A reduced car parking ratio to what is required can be favourably considered given the site's proximity to key high capacity and frequent public transport links.

(c) *The Car Parking Strategy for the proposed development, having particular regard to the quantum of residential parking proposed, how it is intended to be assigned and managed.*

Response

A management agent will ensure an active parking management strategy is regularly enforced in the development via the on-site estate management team. Car parking spaces will be allocated in accordance with Management Company policies and leasing structure for perspective owners within the development. The purchase of a unit will not guarantee the right to a designated parking space. Residents who request a private car parking space will be allocated on a 'first come, first served' basis.

Owners will only be able to utilise their allocated car parking space and the onsite management team will provide a permit to the residents who will display it on the window of the vehicle. No additional car parking will be provided by the proposed development. If no car parking spaces are available, the future owner will be informed of this prior to occupation of a residential unit.

(d) *Pedestrian and cycle links to adjoining lands and connections to public transport routes and cycle/pedestrian infrastructure.*

Response

There are currently cycle lanes travelling in both directions along Glenamuck road North. Both cycle lanes are separated from the road by a small curb for the majority of the road. Cycle lanes continue for the full



length of Glenamuck road North, and ends at both the signalised junction to the north and the roundabout to the south.

The existing pedestrian network along Glenamuck Road North includes pathways on both sides of the road, separated by cycle lanes. Pedestrian facilities in the surrounding area comprises of a network of footways linking the various neighbourhoods to each other, to local schools and retail centres, and to the Carrickmines Luas Station.

We refer you to the updated “Traffic and Transport Assessment” and “Car Parking Strategy and Mobility Management Plan” each of which address connections to adjoining lands, public transport routes and cycle/pedestrian infrastructure. Connection to adjoining lands is similarly portrayed within the submitted engineering and architectural drawing package, supplied as part of the planning submission package.

The proposed development has been designed in compliance with DMURS with vulnerable road users emphasised over vehicles. In this regard, interconnectivity has been facilitated between the proposed development and the existing road network.

(e) A response to the issues raised in the report of the Transport Division of Dun Laoghaire Rathdown County Council, as contained in the Planning Authorities Opinion dated 4th August 2021.

- 1. The applicant is requested to submit a detailed layout drawing any areas, if any, are proposed to be taken in charge by the council.**

Response:

There will be no requirement for a detailed drawing of the proposed area to be taken in charge as the development will be privately managed by a managing agent.

- 2. The applicant shall liaise with DLR’s Traffic, Road Maintenance sections for agreement on a proposed Priority Junction to facilitate vehicular ingress/egress of the proposed development via a right turn land. The design shall incorporate all necessary infrastructure works to accommodate the future installation of signalised T junction, as per submitted drawings.**

Response:

Please refer to the proposed junction layouts drawing 13-125-P260 that have been prepared by Waterman Moylan, and accompanied with this report.

- 3. The applicant shall liaise with DLR’s Property Management Section to ascertain the ownership and obtain relevant letter of consent for any proposed works on the areas outside the ownership of the applicant.**

Response:

We refer you to the accompanied Letter of Consent for the lands owned by DLR for the consent of any proposed works on the junction entering the proposed development.

- 4. The applicant shall submit in writing that the proposed Priority T Junction will be delivered prior to the commencement of substantial construction works associated with the development, so that construction traffic can avail of the proposed right turn lane into the site. The submitted Construction Management Plan be revised to incorporate this requirement.**

Response:

We refer you to the amended Construction Management Plan Report that has been prepared by Waterman Moylan, where details of the proposed priority T junction that is to be delivered prior to the commencement of the construction works associated with the development.

- 5. The applicant is requested to submit a detailed Quality Audit (which shall include a Road safety Audit, Access Audit, Cycle Audit and Walking Audit) to demonstrate that appropriate consideration**



has been given to all relevant aspects of the development in accordance with the Design Manual for Urban Road and Streets (MURS). The independent Audit Team shall be approved by the Planning Authority (Transport Planning Section) and all measures recommended by the Auditor shall be undertaken unless the Planning Authority approves any departure in writing. A feedback report and a map showing the location of issues identified should also be submitted providing a response to each of the items.

Response:

We refer the Board to the appended Quality Audit submitted as part of the Engineering Assessment Report by Waterman Moylan.

We trust that this will be satisfactory to An Bord Pleanála.

6. In accordance with the County Development Plan Policy ST27: Traffic Noise ‘the effect of traffic noise on new development must be considered and appropriate measures undertaken to mitigate same.’ The applicant shall show what mitigation measures (if any) will be provided in order to keep noise within the development to acceptable levels i.e., boundary treatment, and double/triple glazing etc.

Response:

We refer the Board to the Preliminary Construction Management Plan that has been prepared by Waterman Moylan that details Construction Noise Management. The below mitigation measures have been proposed:

It is proposed that the construction works will incorporate:

- Best practice measures relating to the control and minimisation of as set out in BS 5228 (2009) Parts 1 and 2 noise during all phases of the work,
- Selection of quiet plant including proprietary acoustic enclosures to compressors and generators,
- Control of noise sources including reduction of resonance effects by stiffening and/or the application of damping compounds to panels and/or cover plates;
- Control of rattling and grinding noise by fixing resilient materials between the contact surfaces;
- Screening by demountable enclosures;
- The siting of mechanical plant as far away from residential areas as possible; and
- Regular maintenance of all plant.

The proposed boundaries shall provide for a solid 600mm wall and 1200mm railing to the west, north and south of Blocks A&B and to the west of Block C. The solid wall shall provide an element of sound proofing. The railings chosen to provide security and allow light into the ground floor units. The proposed boundary treatment, therefore, would have a limited impact on sound proofing but would provide the amenity and security required for a development such as this.

Defensive planting and the planting of trees shall provide a limited level of sound proofing. It shall protect the lower ground floor from visual impact of traffic. Solid boundaries and high planting is not preferred adjacent to the buildings as the passive supervision of exterior spaces and light would be greatly reduced.



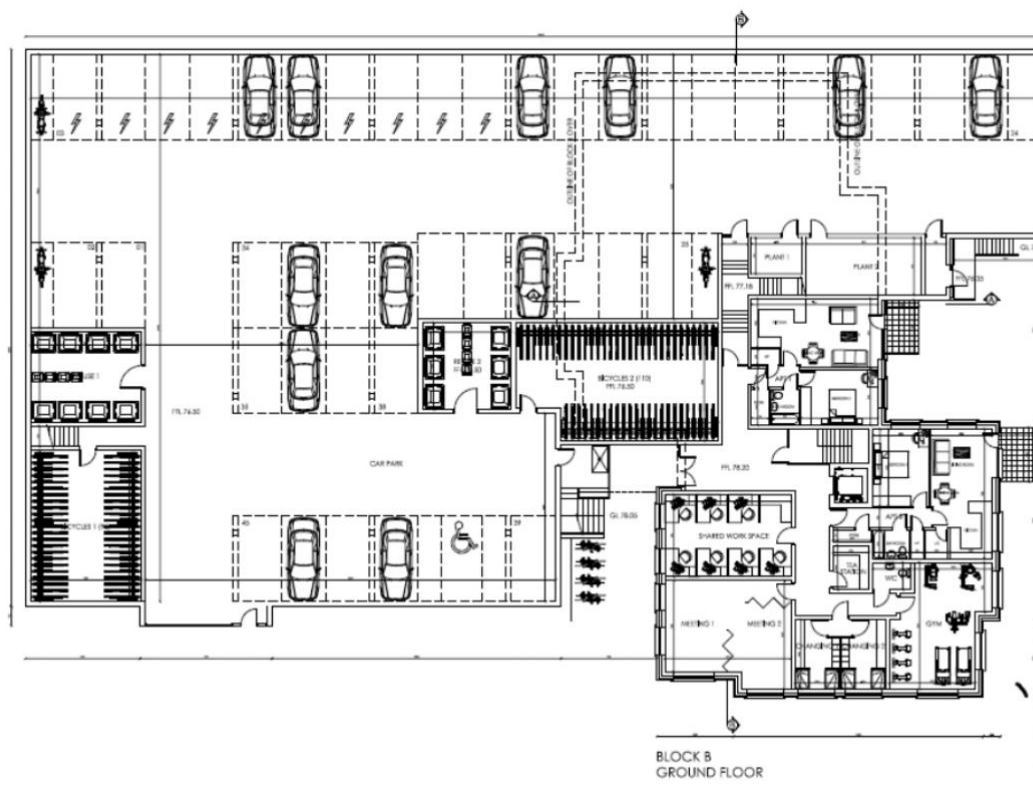
7. A total of 132 no. parking spaces to serve the proposed units is required. The applicant shall submit drawings which demonstrate this level of provision the submitted drawings should clearly demonstrate the required number and location of car parking spaces assigned to visitors, car sharing schemes, deliveries, and disabled parking.

Response:

Given the highly accessible location of the subject site, it is intended to provide for car parking at a rate below the maximum standards set out within the Dun Laoghaire Rathdown County Development Plan 2016-2022.

The proposal includes a total of 103 car parking spaces, 68 are proposed at basement level and 35 spaces at surface level. This equates to a ratio of 0.87 spaces per residential unit. 5 no. car parking spaces will be accessible car parking spaces, and 17 no. spaces for electric vehicles, and 5 no. motorcycle spaces are proposed.

The level of parking proposed is considered appropriate having regard to the site's accessible location in close proximity to a Luas stop and other public transport services.



8. Short-term cycle parking: The applicant shall submit revised drawings and details which demonstrate adequate provision of short term cycle parking spaces designed in accordance with Section 3 & 4 of DLRCC's Standards for cycle Parking and associated Cycling Facilities for New Developments (January 2018)

Response:

We refer you to section 10.2 of the Engineering Traffic and Transport Assessment. A total of 280 cycle parking spaces. This proposal exceeds the combined long and short-term cycle parking requirements set out in both the Dun Laoghaire -Rathdown County Council Cycling Policy and Standards and the Design Standards for New Apartments and is considered appropriate to serve the subject proposed development.

Bicycle parking is provided by a combination of short stay spaces externally at ground level and buy long term storage in bicycle stores located at basement level. The level of bicycle storage is provided at 2.15 spaces per apartment along with 26 number of visitors spaces at entrance level to each Block externally.

Visitor parking Block A;	10 spaces,
Basement Block A & B;	202 spaces,
Visitor parking Block B	8 spaces,
Visitor parking Block C	8 spaces,
Basement Block C;	52 spaces.
Total Spaces:	280 spaces

9. **Long-term cycle Parking:** the applicant shall submit revised drawings showing that an increase provision of long-term cycle parking is designed in accordance with Section 3 & 4 of DLRCC's Standards for cycle Parking and associated Cycling Facilities for New Developments (January 2018).

The provision shall be made with the use of Sheffield Type Stands to accommodate a variety of users to facilitate the move to sustainable modes of transportation, including the provision of up to 10% of bicycle storage should cater for larger footprint cargo bikes. The provision shall also accommodate electric charging point for the use of electric bicycles for residents.

The drawings should clearly identify the location, quantum, type of stands, access routes to and from the public road, storage compounds, etc.

Response:

We refer you to section 10.2 of the Engineering Traffic and Transport Assessment. A total of 280 cycle parking spaces. This proposal exceeds the combined long and short-term cycle parking requirements set out in both the Dun Laoghaire-Rathdown County Council Cycling Policy and Standards and the Design Standards for New Apartments and is considered appropriate to serve the subject proposed development.

Long term cycle parking is in the basements of both Block B & C. The bicycle storage area will be provided with 10% charging points to accommodate electric bicycles for residents. Sheffield Stands will be used at surface level with two tier cycle racks in the storage areas as indicated on the site layout plan and floor plans.

10. **The applicant shall comply with Section 8.2.4.12 of the current County Development Plan (2012-2022) showing in a detailed layout drawing(s) a minimum provision of 10% of the car parking spaces have fully operational electric charging points for electric vehicles.**

Response:

Architectural drawings indicate 17no. (16.5%) to have electric power recharging points on basement plan layout drawings. (10no. in Basement of Block B and 7no. in the basement of Block C)

11. **The applicant shall demonstrate that all proposed car parking spaces are constructed to be capable of accommodating future electric charging points for electrically operated vehicles. The following weblink is recommended <http://www.esb.ie/electric-cars/index.jsp>.**

Response:

Architectural drawings indicate 17no. (16.5%) to have electric power recharging points on basement plan layout drawings. (10no. in Basement of Block B and 7no. in the basement of Block C)



All car parking spaces to be constructed to be capable of accommodating future electric charging points for electrically operated vehicles

12. The applicant is requested to ensure provision of at least 4% of parking spaces within the proposed development reserved for use by disabled persons in accordance with Section 8.2.3.5 of the Dun Laoghaire-Rathdown County Development Plan, (2016-2022). Parking bay widths suitable for disabled parking bays shall be a minimum of 2.4m wide – with a 1.2m buffer on both sides – and 6m in depth. The provision shall be distributed along the site, including in the podium level allowing spaces sheltered from the elements.

Response:

A total of 5 disabled parking bays (>4%), to current design standards have been afforded within the development, as demonstrated on Waterman Moylan drawing 13-125-P201 and architectural basement layout

3.3 Item 3: Potential Impacts in Residential Amenities and Adjoining Lands

- (a) Daylight/Sunlight and Overshadowing analysis, showing an acceptable level of residential amenity for future occupiers of the proposed development, which includes details on the standards achieved within individual rooms within the development in communal open spaces and in public areas within the development. The impact on adjoining lands and residential properties and uses should also form part of the assessment.

Response:

Assessment of quality of sunlight and daylight to adjacent properties

There will be minimal reduction to the daylight and sunlight of the adjacent dwellings. There will be minimal reduction in the sunlight to any of the amenity spaces to the adjacent properties. All the adjacent properties assessed meet or exceed the recommendations of the BRE guidelines, and any impact will be negligible.

The detailed assessment of the daylight levels to adjoining dwellings are carried out in Section 3. All the windows to the adjacent properties will retain a VSC in excess of 27% or will not be reduced below 80% of their existing value and meet the target values set out in the BRE guidelines.

The detailed assessment of sunlight levels to the adjoining dwellings is carried out in section 4. All the windows assessed to the main living spaces with a window wall within 90° of due south have an APSH percentage greater than the recommended 25% APSH (annual probable sunlight hours) and 5% of the sunlight hours from 21 September to 21 March.

The assessment of sunlight to the gardens and amenity spaces to the adjacent properties is carried out in section 5. All the adjacent amenity spaces achieve in excess of 2 hours sunlight over 50% of the amenity space and will continue to achieve in excess of 2 hours sunlight over 50% of the amenity space with the proposed development in place. Additionally, the amenity space will not be reduced below 80% of its existing value.

Assessment of the quality of the proposed development.

All the units within the proposed development exceed the recommendations of the BRE guidelines for quality of Daylight. The bedroom and living space layouts have been optimised for daylight and sunlight. All the living spaces with a kitchen exceed the target ADF value of 2% and all the bedrooms exceed the target ADF value of 1%. The proposed amenity spaces will be bright and achieve sunlight levels that exceed 2 hours sunlight over 50% of the amenity space on the 21st of March. This meets the recommendations of the BRE guidelines.

The results find that any impact on the adjacent residential structures would be minimal and imperceptible. There would be a good quality of daylight in the apartments analysed and the amenity areas would have sufficient sunlight to be bright and a pleasant spaces. The proposed development meets



the recommendations of the BS 8206-2 2008 and BRE guidance document (2011) Site layout planning for daylight and sunlight. The proposed apartments were also assessed for daylight provision in accordance with EN17037:2018 and all the units exceed the minimum target levels.

- (b) Further consideration of the details and mitigation proposed, to ensure that the proposed development has been designed to avoid direct overlooking of adjacent properties and units within the scheme. The response should include a report that addresses issues of residential amenity (both of adjoining developments and future occupants), specifically with regards to overlooking, visual dominance and noise. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining residential development (permitted or built).**

Response:

Tullybeg and Stafford Lodge to the north and south of Block A are set back 24 meters and 42 meters respectively from Glenamuck Road. Both these houses address the central open space created between Blocks A and Block B. The distance between Block A and Tullybeg at the closest point is 20.6m. This separation being further reinforced by the presence of a substantial copse of trees and avenue giving access to Chigwell House.

Similarly, the impact on Stafford Lodge due to its set back from Glenamuck Road of 42 meters and its distance from Block A of 23.3 meters is not considered to be significant.

Block A faces Carrickmines Tennis Club situated to the west of Glenamuck Road. The element of which it faces is the car park. As a result of the location of the adjoining residential properties of Tullybeg, Stafford Lodge and the element of the car park of the Tennis Club, it is argued that there is no overlooking at this location.

Likewise, the other residential development at Pavillion Gate is located to the northwest of the subject site and is visually separated from the proposed development by a copse of mature trees. Hence, it is argued that there is no overlooking of this development.

Careful consideration has been given to the positioning of Block A and B to create the public open space which is so positioned to provide an open vista opposite Stafford Lodge to the south and Tullybeg to the north hence providing a separation distance to avoid overlooking between the blocks themselves and these existing dwellings to the north and south.

The other properties interfacing with the proposed development are Chigwell House and Brennanstown Vale. Block B is the closest block to Chigwell House. Block B has been positioned further to the west hence increasing the separation distances from Chigwell House and reduced overlooking.

We would argue that due to the separation distance and the tree lined entrance drive that the proposed development will now have minimal overlooking on this property.

With Block C we have reduced the footprint of the building on the eastern side and moved it further away from the eastern boundary with Brennanstown Vale which has greatly reduced the overlooking onto Brennanstown Vale.

This is illustrated on the attached site plan on which the previous position is shown by a dashed orange line. Separation distances vary from 41.7 meters to 48.0 meters at the nearest points while upper floors are set back to reduce the visual impact and overlooking.

We refer the Board to the Preliminary Construction Management Plan that has been prepared by Waterman Moylan that details Construction Noise Management. The below mitigation measures have been proposed: It is proposed that the construction works will incorporate:

- Best practice measures relating to the control and minimisation of as set out in BS 5228 (2009) Parts 1 and 2 noise during all phases of the work,
- Selection of quiet plant including proprietary acoustic enclosures to compressors and generators,
- Control of noise sources including reduction of resonance effects by stiffening and/or the application of damping compounds to panels and/or cover plates;
- Control of rattling and grinding noise by fixing resilient materials between the contact surfaces;
- Screening by demountable enclosures;
- The siting of mechanical plant as far away from residential areas as possible; and



- Regular maintenance of all plant.

(c) The development should be designed so as not to have any negative impact on any potential redevelopment of adjacent lands.

Response :

Block A has minimal window to its northern elevation which will not influence any redevelopment of lands to the north.

Similarly, and in addition to the redesign of Block B, all windows on the northern elevation have been omitted so as not to affect the future development potential of the adjoining lands to the north of the subject site.

Block C has been also designed to not negatively impact the redevelopment of lands on Brennanstown Vale.

The development is designed to present the narrowest elevations at the closest point to the neighbouring boundaries to minimise the obstructing mass. Separation between the blocks and the avoidance of long continuous elevations facing the boundaries allow light penetration to the adjacent properties. Detailed assessment to the adjoining development at Carricáil is carried out in Section 3.7 and the results find the ADF values in the Carricáil development exceed the recommended values set out in the BRE guidelines and BS 8206-2 2008. Additionally, the assessment of the proposed development was carried out with the inclusion of the Carricáil development, and all the units exceed the target values for the ADF levels.

(d) Consideration of the impact on the development/redevelopment potential of adjoining lands, having regard to, inter alia, the limited separation distance proposed between the development and site boundaries.

Response :

Separation Distances between Blocks

Block A

Block A is located on the western boundary of the site fronting Glenamuck Road. The nearest point of Block A to the Northern boundary is 6.0m. The distance between Block A and Block B is ranging from 38 m to the north, to 41.9m to the south of the Blocks. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Block B

The distance of Block B from the northern boundary has been increased from 2.4m to 5.5m at the closest point. Block B has also been moved an additional 4m from the eastern boundary to 5.6m while at the closest point the total number of floors at the S.E corner is 7 this reduces to 6 at the northeast corner to the 3M slope of land from north to south.

The separation distance between Block A and Block B is ranging from 38 m to the north, to 41.9m to the south. These separation distances are considered acceptable having regard to the layout, size and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

In addition, the separation distance between the corner of Block B and C is (noting the location, design and orientation, as evidenced in the application documentation, of Block B the distance of 17.5m to Block C is considered acceptable). These separation distances are considered acceptable having regard to the layout, size and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.



Block C

The eastern side of Block C has been moved an additional 4m from the boundary with the houses in Brennanstown Vale on the eastern side from 3.3m to 7.8m at a minimum.



Separation Distances from Level 1-4



Separation Distances from Level 5



Separation Distances from Level 6



Separation Distances from Level 7

Separation Distance between adjoining developments

Tullybeg

We note that separation distances of 20.6m and 27.5m from Blocks A and B to the property at Tullybeg are delivered, which is a significant improvement on the 18m and 19m separation distances under the above permission. The separation distances increase as the blocks increase in height from the fourth floor. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Chigwell

In addition, we note that separation distances of 35.1m-46.3m are delivered from Blocks B and C to the property at Chigwell. This is an increase in separation distances of 28m permitted under the previous permission and supports the reduction in distance to boundary from Block B to this shared boundary. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Stafford Lodge

Distances of 19.3 m and 46.3m are delivered between blocks B and C to the residence at Stafford Lodge. We note again that the northern elevation of this building faces onto the area of open spaces where a single-storey residential amenity building is proposed. The location of this building and its relationship to Stafford Lodge is not considered of any concern given its height at 1 storey. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Carracail

The proposed Carracail apartments, to the south, are within the same ownership of the proposed development, has not been constructed yet. The separation distance between Block C and the proposed Carracail development is 17.1m. This is below the required 22m separation distance; however, the architects have taken great detail to increase the stepping levels overlooking Carracail in order to reduce the impact on the proposed development.

The dominant point of height impact is at the parapet of the 5th floor on the northern side with the 6th floor set back, and at the parapet of the 4th floor at the southern side with significant setback at 5th, 6th and 7th floors to relate to the approved development of Carracail, which is in the same ownership as this applicant. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.

Brennanstown Vale

On the eastern side Block C has been moved an additional 4m from the boundary with the houses in Brennanstown Vale and on the eastern boundary the section of the block nearest to the boundary is 4 storeys at the dominant point of visual impact. At 5th & 6th floor levels the distance from the houses in Brennanstown Vale varies from 40.6m to 48.0m at the point where the building is 4 storeys with a further set back at the 5th floor level. These separation distances are considered acceptable having regard to the layout, size, orientation and design of the proposed development and contribute to ensuring that no negative effects arise in relation to excessive overlooking, overbearing and overshadowing effects. Furthermore, the said distances further assist providing sustainable residential amenity conditions and open spaces.



These separation distances are outlined below.



3.3 Item 4: An Bord Pleanála requested the submission of the following specific information with any planning application for permission:

1. A Housing Quality Assessment.

Response:

We would like to refer An Bord Pleanála to the Housing Quality Assessment that has been prepared by McGrane and Partners Architects and is included in the Appendices of the Design Statement, which is enclosed with this planning application

2. Justification/rationale for approach to Childcare Provision.

Response:

A detailed Community Infrastructure Statement has been prepared and accompanies this application. This statement is also prepared in compliance with the Development Management Thresholds document contained in Appendix 10 of the Dun Laoghaire Rathdown County Development Plan 2016 to 2022, which sets out that a residential proposal for over 100 residential units requires the submission of an assessment on infrastructural requirements for community, recreational, sporting facilities, first and second level schools and shops.

We trust that this will be satisfactory to An Bord Pleanála

3. A Landscape Impact Assessment and a Visual Impact Assessment.

Response:

ARC Architectural Consultants Ltd have prepared a Landscape Impact Assessment and a Visual Impact Assessment of the scheme which is submitted as part of this application. The Assessment is based on a suite of 20 no. long range views prepared by Digital Dimensions which show the proposed development in context.

We trust the Board will refer to the full assessment accompanied with this application.

4. A response to the issues raised in the Planning Authority's Opinion received by An Bord Pleanála on 4th August 2021.

- 4.1 The applicant states the proposed residential density will be c.113 units per hectare. This figure is based on the stated site area of 1.06ha. Were the density based on the substantive development area of 0.74ha, the density would be c.163 units per hectare. The planning authority has previously used the substantive development area for the proposes of density calculation on other SHD's such as Shaldon Grange in Kilternan. The applicant is requested to adopt a similar approach to this scheme.**

Response:

The applicant has adopted the substantive development area for the purpose of density calculation across the proposed development,

"The overall proposed development of 118 units provides for a residential density of 159 units per ha based on the substantive development area of 0.74ha"

We trust that this will be satisfactory to An Bord Pleanála

- 4.2 Whilst the Planning Authority agree that the site is suitable for an increase in height above the adjoining 1 to 2 story built form, the Planning Authority considers that 6 storeys is sufficient to maintain the existing and future residents' amenity and taking into account the immediate site context and future development potential of the adjoining sites, a reduction in height by 1 storey would also ensure a density (if the substantive development area is used as recommended) is more in keeping with the immediate area.**

Response:

Careful consideration has been given to the proposal in regard to how it addresses the existing surrounding development and local topography. The high quality design submitted provides an appropriate transition between the neighbouring sites, through the delivery of 4 storey height with a transition to 6 and 7 storeys at set back higher levels. The height of the 3 Blocks extends to 7 floors with the top floor being set back with the proposed heights are very much sympathetic to the surrounding residential pattern and it is argued that the proposed heights and density are in accordance with the government policy for Urban Development and Building Heights 2018.

While we accept the height of the 3 blocks vary from 6 to 7 storeys, we would submit that the visual impact created by these buildings is much less than a building of 6 stories without the visual impact reductions of the set back of the two higher floors.

- 4.3 The applicant should consider setting the buildings further back from the adjoining sites' boundaries and adding more visual interest to the blocks. This is particularly important given the scheme will be setting a new built context for the area.**

Response:

We would argue that the appropriate set-backs have less visual impact than a 6 storey over ground building with no setbacks which Dun Laoghaire Rathdown County Council would accept as



complying with the heights approved by their development plan. We therefore urge the Bord to favourably consider the proposal as currently submitted.

- 4.4 The applicant is requested to provide a detailed breakdown of the scheme/apartment's compliance with the Apartment Guidelines for Stage 3 that demonstrates that the scheme meets the required qualitative and quantitative standards for a residential development. This should be provided in tabular form. The applicant is also asked to consider a revised mix of units for the scheme more in keeping with the Development Plan Standards on this. Or if not an explanation as to why the proposed mix has been chosen.**

Response:

A detailed breakdown of the schemes compliance with the Apartment Guidelines is provided by McGrane Architects in the Schedule of Accommodation, which is accompanied with the Design Statement.

How the proposed development complies with the Apartment guidelines is justified in Section 10.10 of the Planning Report and Statement of Consistency that has been prepared by Brock McClure and is enclosed with this report.

- 4.5 The development falls short of the recommended provision of open space by 2,000 sqm. With regard to the 10% default minimum outlined in the development plan, using the site area of 1,06ha the landscaping area appears to present 9.7% (a large amount of which is podium open space), not 13.94% of the site area. For clarity's sake, the applicant cannot use the larger site area to suggest a lower density for the site, and a smaller site area to suggest a higher percentage of open space. The applicant is also requested to consider how car parking by Block C can be minimised visually.**

Response:

The current proposed development provides an overall open space of 2,071sqm, which meets both the requirements of the Apartment Guidelines and the Dun Laoghaire Rathdown County Development Plan. The residential amenity building is no longer a stand-alone, 1 storey building between Block A and Block B, this residential amenity facility is not incorporated into Block B.

The quantum of open space has increased by 1,039.1 sqm, from 1,031.9 sqm to 2,071sqm for Stage 3 of this application. The open space is now provided by one major centrally located open space between Blocks A and B and enclosed to the south.





- 4.6 The applicant is requested to provide a small creche on site, in particular siting the lack of childcare close by and the development potential of the immediate sites. Furthermore, the applicant is requested to clarify the radius (km) chosen for schools, which seems quite generous.

Response:

The community Infrastructure Statement has been prepared by Brock McClure and submitted with this application.

- 4.7 The applicant is requested to provide more car parking (5 spaces) and bicycle parking in accordance with local/national standards. Significant further information/detail is also required on the proposed signalised T junction at Glenamuck Road North. Further details of this are set out in the Transport Planning Report.

Response:

“Parking provision and the standards applied have been detailed in section 10 of the “Traffic and Transport Assessment” submitted as part of the engineering package. We also refer you to the “Car Parking Strategy and Mobility Management Plan” which has been prepared for the purposes of determining the appropriate level of parking provision in support of the planning application for this development.

Agreements made with Dun Laoghaire Rathdown traffic department with respect to the T-junction entrance from the Glenamuck Road have been detailed in Section 7.2 of the Engineering Assessment Report. We also refer you to the road junction drawing 13-125-P280 in this regard.”

- 4.8 The applicant is requested to give further detail on Irish Water matters such as an “Irish Water Pre-Connection form”.

Response:-



Confirmation of Feasibility has been received from Irish water and similarly a Statement of Design Acceptance. Please refer Engineering Assessment report in this regard.

4.9 Drainage issues are set out in full in Appendix B.

Response:

Drainage items as noted in Appendix B have been addressed as part of the Engineering submission package. We refer you in this regard to the submission Engineering Assessment Report, Flood Risk Assessment Report and referenced drawings within.

4.10 Transportation issues are set out in Appendix B

Response:

Transportation items as noted in Appendix B have been addressed as part of the Engineering submission package. We refer you in this regard to the submission Engineering Assessment Report, Traffic & Transport Assessment, Car Parking Strategy and Mobility Management Plan, DMURS Statement of Consistency, Construction Management Plan and referenced drawings within.

4.11 Park and Landscape issues are set out in full in the accompanying Landscape Rationale Report and accompanying drawings by RMDA

Response:

The issues addressed in the Parks and Landscape Report have all been addressed in the full suite of documents provided by Ronan McDiarmada which accompany this application.

5. Address issues raised in the Irish Water Submission dated 9th August 2021.

Response :

All standard procedure to be followed with Irish water with respect to connection agreement obtainment, construction in accordance with Codes of Practice and standards, Statement of design acceptance obtainment and engagement with Irish Water with respect to build over/diversions.

It is noted that in advance of Irish water (IW) connection agreement provision, the applicant shall obtain/provide a) permission to connect to the third-party infrastructure, b) confirmation that the 3rd party infrastructure has sufficient capacity for the added load, c) confirmation that the 3rd party infrastructure is of sufficient integrity to take the added load and connection d) identify and procure transfer to Irish Water arterial infrastructure within 3rd party lands e) demonstrate that arterial infrastructure is in compliance with IW Codes of Practice and standard details.

As standard, storm water from the site cannot be discharged to the Irish Water network and the basements are designed such that surface water from the site and/or surrounding areas cannot flow down to the car park.

6. An Ecological Impact Assessment.

Response:

We confirm for the competent authority that an Ecological Impact Assessment (EclA) has been prepared by Enviroguide Environmental Consultants and is submitted with this application.

We trust that this will be satisfactory to An Bord Pleanála



7. A Tree survey, Tree Retention Plan, Tree Constraints and Arboricultural Assessment.

Response:

A tree survey, tree retention plan, tree constraints and Arboricultural assessment has been included in Arboricultural Assessment prepared by Joe McConville. We trust that this will be satisfactory to An Bord Pleanála.

We would like to note that there are no trees on the site. There are no Tree Preservation Orders on the trees on adjoining sites. In addition, there is no objective in the County Development plan to protect and preserve trees and Woodlands at locations within or adjoining the site. The location of the young trees on the boundary of adjacent sites have been plotted, and their dbh and crown spreads are estimates as per 4.4.2.6 (c) – BS 5837:2012. They have been indicated on the constraints plan.

A detailed tree survey of trees on adjacent sites within falling distance of the applicant site cannot be undertaken, as entering the lands and tagging and measuring the trees could be considered criminal damage and contrary to the Criminal Damages Act 1991.

The tree survey was carried out from the applicant site; a detailed assessment of the trees on adjacent sites was not possible. The condition of the trees and their useful life expectancy cannot be confirmed. However none of the trees had obvious signs of pests or diseases.

There are six trees outside boundary B on the adjoining property; a Copper beech, Norway maple x 2, Copper beech, Cypress and an Oak, they are indirectly affected by the proposed carpark bays and the proposed new boundary wall; special measure will be taken to protect the trees, see part three Arboricultural Method statement prepared by JM Mc Conville and Associates submitted with this application.

8. A draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan.

Response:

Waterman Moylan have prepared a draft Construction Waste Management Plan, draft Construction and Environmental Management Plan and a draft Operational Waste Management Plan, which accompanies this planning application. We trust that this will be satisfactory to An Bord Pleanála

9. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant Development Plan or Local Area Plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8 (1) (a) of the Act of 2016 and Article 292 (1) of the Regulations 2017, shall refer to any such statement in the prescribed format.

Response:

A Material Contravention Statement has been prepared by Brock McClure and enclosed with this planning application. This statement details the basis for consideration by An Bord Pleanála of a grant of permission in material contravention of certain non-land use policies and objectives of the Dun Laoghaire Rathdown County Council Development Plan 2016-2022.

10. The information referred to in article 299B (1)(b)(1)(11) and article 299B (1) (c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.

Response -

Enviroguide have prepared an Article 299B (1)(b)(1)(11) and an article 299b (1)(c) to accompany this planning application. We trust that this will be satisfactory to An Bord Pleanála



4 Conclusion

In conclusion, we trust that all the issues raised by An Bord Pleanála in its opinion have been comprehensively addressed in the planning application submitted to the Board as set out within this statement of response and the accompanying documentation.

The proposed development provides for a number of high-quality residential units across a range of sizes and tenures and within a range of building typologies of varying scale and height, with associated open spaces, in a scheme which effectively responds to the characteristics and constraints of the subject lands with a considered and site specific design. The development provides for a range of connections to adjacent areas and adjoining permitted and existing developments . The application documentation now



submitted takes cognisance of and responds to the the points raised by the Board in its Opinion.

The Design Team has finalised the scheme on the basis of feedback received through the consultation process and we submit that the final proposal now submitted is reflective of all comments received.

