

August 2019

Statement of Response to An Bord Pleanála Pre-Application Consultation Opinion



**Proposed Strategic Housing Development
Clongriffin SHD 1
Lands at Clongriffin, Dublin 13**

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1.0 Introduction

This statement of Response accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on lands at Clongriffin, Dublin 13.

Following consultation with Dublin City Council under Section 247 of Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted in December 2018, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request in January 2019. The pre-application consultation meeting was then held at the offices of An Bord Pleanála on 5th February 2019.

On 21st February 2019, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-303260-18.

Having regard to the above, the opinion states that An Bord Pleanála *“has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission to the Planning Authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.”*

The opinion further states that *“pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission”* and notes 14 items to be submitted with any application.

The statement now sets out a response to An Bord Pleanála’s pre-application consultation opinion. This statement of response should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application.

2.0 Requested Specific Information

2.1 Item No. 1 – Sustainable Neighbourhoods and Build to Rent Report

A report which examines and provides a justification for the scale of the proposed build to rent tenure provision within the proposed development having regard to the creation of sustainable neighbourhoods within the context of the Clongriffin area. The report should also examine the provision, both qualitative and quantitative, of residential support amenity areas, within the overall scheme and on a block by block basis, having regard to both Section 5 (section 5.1-5.12) and SPPR 7 and SPPR8 of the Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, March 2018.

Downey Planning, in conjunction with Liv Consult, have prepared a ‘Sustainable Neighbourhoods Build to Rent Justification’ report which is enclosed with this response. In 2014, LIV transitioned into the UK’s Build to Rent (BTR) Sector and has since been the first to introduce a dedicated operating model that defines every stage of a development from acquisition to operation. In 2016, LIV Consult was created to provide bespoke and specialist consultancy advice to the BTR market in the UK and

internationally and is currently advising on the development of more than 35,000 BTR units in developments from High-rise apartment communities to suburban masterplans. LIV Consult is also currently involved with over 4,000 BTR units in various phases of development in Ireland and is involved in the current proposed development at Clongriffin.

The 'Sustainable Neighbourhood Build to Rent Justification' provides an overview of the entire proposed development of 1,950 units subject to all three concurrent applications and demonstrates how the proposed tenure provision in the context of the extant and constructed development at Clongriffin contributes to the creation of a sustainable neighbourhood in Clongriffin.

The proposed 1,950 residential units are provided across 15 no. blocks with 1,130 Build to Rent units, 625 build to sell units and 195 Part V units. The Build to Rent units are proposed within 8 no. blocks (Blocks 4, 6, 13, 14 (b), 17, 25, 26 & 27) with 3,535 sq.m. of ancillary BTR resident's support facilities and BTR resident services and amenities provided solely within these blocks. It must be noted that the proposed quantum of BTR tenure has been reduced from that tabled at the Stage 2 meeting such that 1,130 units are now proposed for Build to Rent in lieu of the previously proposed 1,766 units proposed for Build to Rent at the Stage 2 meeting.

The development of Clongriffin has been subject to a parent masterplan (Reg. Ref. 0132/02) which was granted in 2003 for a scheme of some 3,600 residential units with 100,000 sq.m. of shops, services and employment. To date 1,685 dwellings, duplexes and apartments have been built with a further 503 units under construction. The enclosed Sustainable Communities Build to Rent Justification report includes specific details on how a sustainable neighbourhood will be achieved at Clongriffin in the context of the constructed developments on site. The report also sets out the proposed development's compliance with Section 5 (section 5.1-5.12) and SPPR 7 and SPPR 8 of the Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities, March 2018.

For further information in this regard, please refer to the enclosed 'Sustainable Neighbourhoods Build to Rent Justification' report prepared by Downey Planning and Liv Consult.

2.2 Item No. 2 – Materials and Finishes

A report that specifically addresses the proposed materials and finishes of the proposed structures including specific detailing of finishes, openings and privacy screening, the treatment of balconies/privacy screening, shopfronts, landscaped areas, pathways, entrances and boundary treatments. The treatments/screening of exposed areas of basement ramps and podiums should also be addressed. Particular regard should be had to the requirements to provide high quality and sustainable finishes and details which seek to create a distinctive character for the overall development within the proposed character areas and having particular cognisance of the requirement to avoid blank facades. The documents should also have regard to the long-term management and maintenance of the proposed development.

CCK Architects have prepared a 'Materials and Finishes Report' which is submitted with this application which provides further details on the proposed materials for the overall development at Clongriffin and which has been informed by all three project architects, CCK Architects, Wilson Architecture and Downey Planning & Architecture.

The material palette has been carefully thought through to create distinct neighbourhoods within the town as well as providing continuity of high-quality durable finishes to the landscape and building facades. The quality of the urban environment created in this new town has been Gerard Gannon Properties intention from its inception and will continue to be in the final proposed phases.

The report provides details on the finishes, openings and privacy screens noting that a mix of design approaches have been taken to ensure privacy is maintained for residents in the design of the balconies at different blocks and within different neighbourhoods. This creates a varied feel for the different neighbourhoods within Clongriffin. Some blocks have fully recessed balconies with excellent privacy. The lakeside neighbourhood of Blocks 25, 26 and 27 have recessed balconies integrated into the facade. Other blocks have semi-recessed balconies while others have balconies overhanging the façade.

The approach to the design of building entrances and ground floor apartments is also set out within this report. At apartment main entrances, a combination of recessed doorways and canopy overhangs are used to provide weather protection and security for residents.

A comprehensive landscaping scheme has also been prepared for the development by Ronan McDiarmada & Associates Landscape Architects focusing on a range of high quality outdoor spaces for residents which include public parks, communal amenity gardens within the blocks for residents' use, play areas with passive supervision at podium landscaped communal outdoor areas, extensive sedum roofs and roof gardens for residents providing for a wide range of resident's needs. The landscape approach is integrated with the engineering design to ensure a highly sustainable development which can be easily maintained in the future.

The retail design strategy for the town centre as a whole is very important to Gerard Gannon Properties and a comprehensive document setting out Clongriffin Retail Design Guidelines for prospective retail tenants has been submitted under separate cover as part of this application and further expands on the shopfront designs details set out within this materials report.

The report also sets out on a block by block basis the proposed materials and finishes and is enclosed with this application for the consideration of the Board. Please refer to the enclosed report for further details.

2.3 Item No. 3 – Traffic and Transport Assessment

A traffic and transport assessment and mobility management framework including the provision for shared mobility, for the proposed development which should have regard to existing public transport which serves the area.

Waterman Moylan Consulting Engineers have prepared a detailed Traffic and Transport Assessment and a Travel Plan/Mobility Management Plan for the proposed developments at Clongriffin (i.e. Clongriffin SHD 1, Clongriffin SHD 2 and Clongriffin Planning Application).

The Transport Assessment (TA) is a comprehensive review of all the potential transport impacts of the overall development, both existing and proposed, including a detailed assessment of the Transportation systems provided and the impact of the proposed development on the surrounding

environment and transportation network. The TA is accompanied by a Travel Plan/Mobility Management Plan to implement the mobility management policies for the development and achieve the sustainable travel targets.

The results of the road and junction assessments indicate that all of the junctions assessed are operating satisfactorily in 2018 and will continue to do so in 2025. The results of the public transport assessment indicate that capacity, both rail and bus, is operating satisfactorily in 2019 and that service capacity will considerably exceed the forecast demand at Clongriffin in 2025. The report concludes that the overall impact of the proposed development on the transportation infrastructure surrounding Clongriffin will be neutral. Please refer to the Traffic and Transport Assessment enclosed with this application for further details.

The scope of the Travel Plan is to promote best practise mobility management and travel planning at Clongriffin, to balance car use to capacity and to provide for the necessary mobility via sustainable transport modes. Travel management is a key operational feature in the provision of sustainable travel infrastructure at Clongriffin. The management will implement the Travel Plan on an ongoing basis as the successor to the Mobility Management Plan, with the triple objectives of promoting sustainability, enhancing public transport and reducing dependency on the use of the private car for the journey to and from Clongriffin. The targets set in the Travel Plan will be achieved against the background of expanding public transport capacity in the surrounding catchment. Please refer to the enclosed to the Travel Plan/Mobility Management Plan for further details.

2.4 Item No. 4 – Car Parking Strategy

A detailed car parking strategy and rationale which outlines in particular measures to direct care users within the scheme to available parking spaces.

A detailed car parking strategy and rationale document has been prepared by Waterman Moylan Consulting Engineers titled 'Proposals for Parking' and is enclosed with this application. The parking proposals address the existing and proposed parking at Clongriffin including the quantum, the location, the operation and management of parking for private cars, public transport, taxi, bus and cycle.

A total of 2,555 spaces will be provided at Clongriffin being 1,466 reserved spaces for residents, 623 shared spaces for visitors, staff, customers and 420 spaces for Park & Ride. The remaining 46 are pre-assigned for residents. The requirement and allocation of car parking for Clongriffin SHD 1, Clongriffin SHD 2 and Clongriffin DCC Planning Application are fully set out within the enclosed report. Please refer to the enclosed 'Proposals for Parking' report prepared by Waterman Moylan Consulting Engineers for further details.

2.5 Item No. 5 – A Public Realm and Permeability Strategy

A Public Realm and permeability strategy which addresses in particular the treatment of Market Street with particular regard to segregating vulnerable users from vehicular traffic where feasible and if justification exists for crossing points that pedestrians and cyclists are prioritised.

The Public Realm and Permeability Strategy is set out within Ronan McDiarmada & Associates Landscape Architects' Landscape Rationale Report and within the SHD 1 Architects Urban Design Statement. The permeability strategy notes the existing main connections for vehicles, pedestrians and cyclists are Main Street, Station Street and Marrsfield Crescent. Pedestrian and cyclist priority routes are provided along the River Mayne Corridor and Market Street, with east west routes also provided.

Market Street will connect Fr. Collins Park to Station Square along a pedestrian and cyclist focussed street, with active frontages all along the street.

This pedestrian and cyclist priority street has been carefully designed to encourage a safe and inviting environment for those on foot or on a bike with car park entrances located to the side of adjacent blocks and traffic encouraged onto other roads. Only a small amount of traffic will utilise the street as necessary (i.e for drop off etc.) The design of the street has been carefully considered to ensure that the pedestrian and cyclist priority is clear with raised tables at junctions crossing the street and materials and paving carefully chosen to clearly illustrate the nature of the street (i.e. pedestrians and cyclists are prioritised).

This is in conjunction with high quality landscaping, public benches, tree planting, seating, bicycle stands and active commercial and civic street frontages ensure that a lively and safe public street realm is provided for pedestrians. Active street frontages in conjunction with limited car parking and passive surveillance from commercial and residential units will combine to create a pedestrian/cyclist priority street. For further details on the design of Market Street, please refer to Ronan McDiarmada & Associates Landscape Architects Landscape Rationale Report and landscape drawings enclosed with this planning application for the consideration of the Board.

2.6 Item No. 6 – Communal Open Space and Ventilation

Details regarding the impact on the communal open spaces from the requirement to provide ventilation for car park areas located below ground level.

The communal open space areas of Blocks 3, 4, 5, 6, 8, 13, 14, 15 and 28 have all been designed with vents noting the ventilation that is required for the car park areas below the podium landscaped areas. A key consideration for Ronan McDiarmada & Associates Landscape Architects from initial design proposals to detailed design was to incorporate the design of the vents into these communal open spaces. The vents have all been incorporated into the landscape design and are planted with shrub and tree planting or have been designed to incorporate seating within these areas to ensure that there will be no impact on the amenity of the communal spaces as a result of the requirement to provide ventilation. For further details, please refer to Ronan McDiarmada & Associates Landscape Architects Landscape Rationale Report and Landscape drawings that are enclosed with this application for the consideration of the Board.

2.7 Item No. 7 – Residential Amenity

A report that addresses residential amenity, specifically how the development will limit the potential for overlooking and overshadowing within the proposed development and of adjoining properties. This

report should detail screening proposals for proposed units and measures to address units which adjoin the public realm or communal spaces in particular.

The proposed development has been carefully designed by three separate architects within an overall masterplan development. The protection of both existing residential amenity and indeed the protection of the residential amenity of future residents within the proposed development was a key design consideration. The design of various blocks has evolved throughout the design process and following the pre-application consultation stages to ensure that there will be no adverse impacts on residential amenities for existing and proposed residents. The screening proposals and measures to address units adjoining public realm and communal spaces are set out within the overall design statement for SHD 1 and within the design statements for each individual block. The proposed buildings have been laid out to minimise overlooking between apartments through the use of screens for privacy and separation distances to minimise overshadowing, all of which also maximises usability and aspect of private spaces. Appropriate separation distances have been achieved whilst setbacks and design features, as set out within each design statement, have been utilised to ensure there is no overlooking of adjoining properties. Please refer to the enclosed architectural design statements, architectural drawings and shadow analysis documentation for further details in this regard.

2.8 Item No. 8 – Daylight and Sunlight

A comprehensive daylight and sunlight analysis addressing existing units, proposed units and open spaces. A comprehensive justification is required for any north facing single aspect units.

DK Partnership have carried out a detailed analysis of the proposed development and its potential impact on the residential amenity of existing and future residents in terms of daylight, sunlight and overshadowing. This detailed analysis is contained within three reports titled 'Daylight Reception - Existing Dwellings Report', 'Daylight Reception- New Dwellings Report' and 'Sunlight Shadow Analysis- New and Existing Amenity Spaces Report'. It assesses the daylight to existing units, daylight to proposed units, the sunlight to existing and proposed gardens and open spaces, and overshadowing and VSC analysis.

In terms of daylight, the report concludes that the development meets the BRE Guidelines in the urban context and that the effects of the new proposed development on the existing units compared with the parent grant of permission are within the BRE Guidelines. With regards to the proposed residential units, the report states that from the daylight calculation results, all analysed rooms now are within the guidelines of the BRE design guide and therefore deem the daylight reception to be satisfactory. The glazed areas in a number of rooms across the proposed scheme have been increased and the removal of close facing large obstacles in some circumstances has resolved issues as illustrated within the reports.

With regards to the shadow/sunlight assessment on new and existing amenity spaces, the report concludes that at least 50% of the amenity spaces should receive at least two hours of sunlight on the 21st March and therefore the overshadowing / available sunlight of open amenity spaces within the proposed development are all within the constraints of the said Guidelines. Please refer to the enclosed reports prepared by DK Partnership for further details in this regard.

2.9 Item No. 9 – Drawings including Cross Sections

Full and complete drawings including levels and cross sections showing the relationship between the proposed development blocks and adjacent existing residential units and adjoining public pathways/spaces.

A full set of architectural drawings as set out in the documents schedule, are enclosed with this application. The drawing packs prepared by CCK Architects and Wilson Architecture comprise cross sections which sets out the relationship between the proposed blocks and existing residential units and public spaces. Further details on the relationship between the proposed blocks and existing spaces and units are also set out within the design statements for each block. Please refer to the enclosed architectural packs for further details.

2.10 Item No. 10 – Microclimate Study

A Microclimate study of the overall development site (to address matters including down draft and wind tunnelling effects).

The applicant engaged Arup to prepare a Microclimate Study of the overall development. A study was carried out using computational fluid dynamics to understand the influence of the development quality of the public realm. The assessment of pedestrian wind comfort has been carried out in accordance with the Lawson Comfort Criteria.

The objectives of the wind assessment included:

- Examination of the level of pedestrian comfort within the proposed Clongriffin development;
- Mitigation measure proposals to alleviate pedestrian discomfort and distress where required;
- Assessment of the effectiveness of the mitigation measures, which are adopted in the design, at alleviating pedestrian discomfort and distress.

The conclusions of the Clongriffin Development wind microclimate study are as follows:

- The critical wind directions for this development in terms of pedestrian comfort are East, Southeast, Southwest and West.
- In general, road and streets across the development are sheltered from wind. The most adverse wind conditions occur on the east side of the development.
- In general, the different spaces within the blocks across the development experience wind conditions that are consistent with their intended function.
- On the west side, the blocks are close to each other and similar in height. Clustering similar height blocks together enables upwind blocks will shelter those further downstream more effectively.
- Many of the retail streets (i.e. Market Lane, Market and the southern portion of Lake Street) are sheltered effectively from the wind.
- The streets to the northwest of the development are more exposed to the wind as similar size blocks do not surround them on all sides. Although these streets tend to be windier, these thoroughfares remain suitable for their intended use.

- More similar scale development is envisaged between Lake and Station Streets north of Block 16. If it does proceed in future, it is anticipated that there will be a reduction in windiness in the northwest of the development.
- It is beneficial that the main block entrances are located towards the centre of the buildings. It reduces pedestrian movements near the corners where the higher speed winds tend to occur.
- Most courtyards and communal spaces are situated in the centre of the block with buildings surrounding them on all sides. This helps to ensure that these communal spaces are sheltered from all wind directions.
- Most balconies are sheltered from the wind.
- It is anticipated that the proposed mitigation measures will help alleviate distress that could be encountered on occasion in certain areas of the site.

Overall, it is anticipated that the development will be a relatively calm and attractive environment for pedestrians. The development with the adoption of appropriate mitigation measures, where required, will be suited for its intended use. Please refer to the enclosed Wind Microclimate Report that is submitted with the documentation pack.

2.11 Item No. 11 – Boundary Treatments

Details to be provided of boundary treatment along the rail line, details of proposed underpass and any consultation undertaken with relevant stakeholders in respect of same.

Following the pre-application consultation meeting with An Bord Pleanála and the feedback received, Ronan McDiarmada & Associates Landscape Architects engaged with Irish Rail with regards to the boundary treatment of the proposed development along the railway line. Irish Rail noted that normally solid concrete block wall 2.4m in height would be required. However, in this instance there is an existing retaining wall with a palisade fence which is being retained and this was agreed with Irish Rail noting that the existing boundary is holding an embankment which cannot be interfered with. Therefore, it is proposed that the existing boundary remains in situ. Noting a portion of the existing embankment has no boundary, it is proposed to continue a 2.4m high wall down to the wing wall at the underpass. A railing shall be fixed to the wing wall at the underpass. Further details on the consultation meeting with Irish Rail and the proposed boundary treatment, are set out within the Landscape Rationale Document prepared by Ronan McDiarmada & Associated Landscape Architects. Please refer to the enclosed report for further details.

With regards to the underpass, the applicant has provided a path up to this underpass on the lands in their ownership. There is currently a security fence in place to prevent persons passing under the bridge as there is no path on the opposite side of the underpass. The lands on the opposite side of the underpass have not yet been developed for a path and whilst there are plans for a park in the future, there are currently no proposals in place for this. The applicant has provided a path up to the underpass in order to facilitate such a link to the adjoining lands. At the site meeting with Ronan McDiarmada & Associates Landscape Architects, Irish Rail stated that they would request that an enduring authority prepare a proposal for access to the underpass. They have issue on vandalism and access and request that an authority (of the state) i.e. Dublin City Council engage and inform them how this area shall be completed and managed. They wish to deal with an entity of a local authority

rather a private firm. However, the applicant has to date facilitated such a link at the underpass and has no hesitation in opening the link and increasing permeability and connectivity to the adjoining lands when such a path on link on the adjoining lands are provided. Please refer to the enclosed Landscape Rationale Document prepared by Ronan McDiarmada & Associated Landscape Architects for further details on the existing path to the underpass.

2.12 Item No. 12 – Additional CGIs

Provision of additional CGI's within the proposed development.

Following the pre-application consultation with An Bord Pleanála, a significant quantum of additional CGIs and verified montages have been commissioned by the applicant. Digital Dimensions, as suitably qualified 3D consultants, have now produced a compilation of CGIs totalling over 50 no. images, and a total of 18 no. verified montages for the consideration of An Bord Pleanála. In light of the above, it is now submitted that the quantum of verified montages and CGIs produced for this development provide a comprehensive visual representation by which the proposed development can be assessed. For further information in this regard, please refer to the Clongriffin Verified Montages booklet and the Clongriffin Computer Generated Images (CGIs) booklet prepared by Digital Dimensions.

2.13 Item No. 13 – Taken in Charge

A site layout that details any areas to be taken in charge by the local authority.

Downey Planning can confirm that the road/street network and associated infrastructure is proposed to be Taken in Charge by Dublin City Council as set out and indicated on the enclosed Clongriffin SHD 1 Taking in Charge Plan drawing No. 1637 P 109 prepared by CCK Architects. The internal communal open space areas are to be maintained by a private management company. Please refer to the submitted Taking In Charge Plan enclosed with the application for further details. This drawing can be located within the architectural drawings and documentation pack.

2.14 Item No. 14 – Phasing Plan

A phasing plan which includes the delivery of the town centre and in particular the Blocks in the vicinity of Main Street in an early phase of the proposed development.

A Construction Phasing Plan has now been prepared for the overall development. This Plan has been prepared by CCK Architects in conjunction with the applicant and is submitted as part of the planning application. This drawing can be located within the architectural drawings and documentation pack. This drawing provides information as to the proposed indicative phasing of the development and has had regard to the request of the Planning Authority to complete Main Street and the associated blocks as part of an early phase of the proposed development. It is therefore proposed to phase the development as follows:

- Phase 1 - Construction of Blocks 3, 4, 14, 15, 17, 25, 26 & 27 along with Market Street, the completion of Station Street and the completion of Marrsfield Crescent;
- Phase 2 - Construction of Blocks 8, 11 and 28;
- Phase 3 - Construction of Blocks 5, 6, 13 and 29.

With regards to the SHD 1 proposal, Blocks 17, 25, 26 and 27 form part of the first phase of development, Blocks 6, 11 and 28 will be constructed in the second phase whilst Blocs 6 and 29 will be constructed in the third phase. For further information in this regard, please refer to CCK Architects Drawing No. 1637 P 401 titled Clongriffin Construction Phasing Plan. For further information in this regard, please refer to CCK Architects Drawing No. 1637 P 401 titled Clongriffin Indicative Construction Phasing Plan.

3.0 Conclusion

This Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion indicates how the specific information requested by An Bord Pleanála has been addressed and identifies the source or location of the response within the accompanying planning submission documentation.

The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The proposals incorporated into the final scheme proposed are considered to result in a high-quality development now being presented to An Bord Pleanála for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for a strategic housing development at Clongriffin.

In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.