

**Planning Report and Statement of Consistency
Proposed Strategic Housing Development
Glebe House and Coruba, Crumlin
June 2022
For: Seabren Developments Ltd and Circle VHA CLG**



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1. Introduction

- 1.1 This Policy Framework and Statement of Consistency is submitted by Seabren Developments Ltd and Circle VHA CLG to An Bord Pleanála in relation to a planning application for a Strategic Housing Development (SHD) at the vacant site of the former Glebe House and Coruba House site, fronting St Agnes Road, Crumlin. The site bounds Somerville Drive and Somerville Green to the rear. The site has an area of 0.88 ha and the proposed SHD scheme is for 150 residential units, in two apartment blocks, two pavilion buildings and Glebe House together with a café and creche.
- 1.2 The proposed development has been designed by Reddy Architecture and Urbanism (RA+U). Other members of the design team include Mullarkey Pedersen Conservation Architects, CORA Consulting Engineers (Civil and Structural), Áit Urbanism and Landscape, CMK Arborists, NRB Consulting Engineers (Transportation), IES Consulting (Daylight/ Sunlight), Dynamic Design (Electrical), AWN (Wind, Noise, EIA Screening/ S299B Screening and OCWMP) Openfield Ecology(AA Screening and Ecological Impact Assessment), Brian Keely and Altemar (Bat surveys), ISMIreland (telecommunications) and ACSU Archaeology. The *Architectural Design Statement*, by Reddy A+U, sets out the main architectural and urban design considerations underlying the proposal.
- 1.3 One pre-planning meeting was held with Dublin City Council on the 16th September 2021 and a Tripartite meeting was held with An Bord Pleanála on the 21st February 2022.
- 1.4 This report has been prepared in accordance with the requirements of the strategic housing development guidance document issued by An Bord Pleanála. The first part of the report provides details of the proposed development in relation to the location and context of the application site and a summary of the reports accompanying the application.

The second part of the report provides a Statement of Consistency which must demonstrate to An Bord Pleanála, under Section 5 of the SHD Act, the performance of the proposed development in term of the following:

- In the applicant's opinion, the proposal is consistent with the relevant objectives of the Development Plan concerned. The statement should be accompanied by a list of the principal plan objectives considered by the prospective applicant in making the statement.
- In the applicant's opinion, the proposal is consistent with the relevant planning scheme for a strategic development zone made under section 169 of the Act of 2000 (where applicable). This does not apply to this application.
- In the applicant's opinion, the proposal is consistent with any relevant guidelines issued by the Minister under section 28 of the Act of 2000. The statement should

be accompanied by a list of the guidelines considered by the applicant in making the statement.

This statement demonstrates that the proposed development is consistent with relevant national planning policy guidelines issued under Section 28 of the Planning and Development Act, 2000, as amended, and with local planning policy in the Dublin City Development Plan, 2016- 2022.

The application is accompanied by specialist reports, as listed at the end of this document. The reports and other documents accompanying this report demonstrate how the proposed development is consistent with National, Regional and Local Policies and Guidelines issued under Section 28 of the Planning and Development Act and the Dublin City Council Development Plan 2016-2022.



Glebe House and Coruba House Site (Google Earth)

A Material Contravention Statement is included as a separate document in the planning documentation accompanying this SHD application. This statement provides a justification for a material contravention of the Dublin City Development Plan as the proposed building height contravenes the height policy for the site as set out in the current Development Plan for of max height of 16m in the outer city. The Material Contravention Statement demonstrates the appropriateness of the proposal in the context of SPPR 1 of the Apartment Guidelines and SPPR 3 of the Building Height Guidelines. The statement also addresses unit mix in the proposed development which is not fully compliant with the Development Plan. Finally we have set out in the Material Contravention Statement a rationale for the carparking provision which may be considered by the Board to be a Material Contravention of the Development Plan, notwithstanding that the Development Plan appears to only set an upper limit on the number of parking spaces required.

- 1.5 This Planning Report and Statement of Consistency includes details in respect of the proposed development in relation to the site context, setting and site characteristics. The development has been carefully designed to take into consideration national, regional and local planning policy.
- 1.6 It is demonstrated in the report that the proposed development is consistent with the relevant ministerial guidelines issued under Section 28 of the Planning and

Development Act 2000 (as amended) and with the provisions of the statutory guidelines.

- 1.7 The relevant Development Plan for the subject site is the Dublin City Development Plan 2016-2022. It sets out the policy framework against which all applications for permission at the site will be assessed.
- 1.8 For greater detail in respect of compliance and consistency with quantitative standards for residential apartment units as outlined within the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities* (December, 2020), the *Housing Quality Assessment* (HQA) and *Design Statement*, prepared by Reddy A+U, should be referred to.
- 1.9 The planning rationale for the proposed development, and the key details relating to the development can be summarised as follows:
- The proposed Strategic Housing Development is in accordance with National and Regional planning policy for the delivery of residential units and compact growth on sites in proximity to quality public transport routes and within existing urban areas.
 - The subject lands are zoned Z1 “*To protect, provide and improve residential amenities*” as set out in the 2016-2022 Development Plan. The site is located within the built-up area of the Dublin Metropolitan area and served by good quality bus services. This site is considered suitable for the provision of a high-quality scheme of residential units which will contribute to delivering additional residential development in Crumlin.
 - It is considered that the scale and high quality design of the proposed residential development is appropriate for this site given its strategic location and the existing services and amenities offered by its location in Crumlin and to its proximity to a wide range of support infrastructure.
 - Part of Block A at 20.1m exceeds the building height guidance set out in the DCC Development Plan where the maximum permitted height on the subject site is 16m. The remainder of Block A and the fifth floor element of Block B marginally exceed the building height guidance at 17m. A Material Contravention Statement sets out how the proposed development complies with the development management criteria as contained in Section 3.2 and the requirements of SPPR 3A of the Building Height Guidelines.
 - The design of the proposed development is informed by its context and seeks to ameliorate impacts on surrounding properties, whilst striking a balance that provides for an appropriate scale and density of development on the site.

- The proposed development is a sustainable use of residential zoned land on a brownfield site within the Dublin Metropolitan Area.

2. Site Location and Description



Site outlined in yellow

- 2.1 The site, referenced throughout the application documentation as Glebe House, is located immediately north west of Crumlin Village and is made up of two main land holdings. The larger element includes Glebe House, a protected structure, with light industrial workshops and out buildings to the rear, and to the south east a narrower cleared site formerly known as Coruba House. The site includes a narrow grass strip along the Coruba boundary with Somerville Drive. The site bounds Somerville Drive and Somerville Green to the rear. Immediately to the east is a neighbourhood row of shops with a small car park between the Coruba lands and St. Agnes Road.
- 2.2 The site is situated close to the junction of Saint Agnes Road and Windmill Road and lies 4km south west of Dublin City Centre benefiting from a number of bus routes and cycle routes into the city centre.
- 2.3 The site is located within the village of Crumlin surrounded by a mix of commercial and residential properties with its primary frontage onto St. Agnes Road. The village is a busy social and neighbourhood centre serving surrounding residential areas. It contains a Public Library, a Church of Ireland church, a Roman Catholic church, community halls, a parish centre, a variety of shops, cafes, healthcare and service centres, a public house, light industrial and other commercial uses. The area is predominantly made up of suburban housing estates with a couple of apartment schemes. A number of primary and secondary schools within the locality include Rosary College, St. Agnes National School, Loreto College and Drimnagh Castle Primary School. The proposed development site is also within a short walking distance of local green spaces including William Pearse Park to the north east along Windmill Road which contains sports pitches, mature tree planting and a playground, and a local park off Somerville Avenue, situated to the west. A number of urban villages and suburban residential areas lie in close proximity to the site. Drimnagh is situated to the north-east, Kimmage, Harold's Cross and Terenure are to the east and Walkinstown is to the west.

2.4 Existing Site Condition:



The site is approx. 0.88 hectares in area and contains a protected structure, Glebe House, an unoccupied three-storey detached period house with its main frontage onto Saint Agnes Road. Glebe House was recently subject to a fire (April 2022) which has caused extensive damage to the upper floor and roof.

Located behind Glebe House are a number of vacant light-industrial workshop units in varying states of disrepair, with a paddock to the rear which was, prior to the applicant's ownership, used to store materials and to graze horses. The vacant site of the former Coruba House, which forms the eastern part of the site, is currently separated from the Glebe House lands by a block work wall and the exterior walls of the workshops and semi-industrial units in this location. The existing boundary with Somerville Drive residential estate to the east comprises remnant of factory walls from demolished industrial units, which had previously existed there. The site is relatively flat with frontage onto St. Agnes Road defined by a limestone wall with a line of four mature trees (3 Horse Chestnut trees and 1 Sycamore) of varying condition along the boundary and a mature Sycamore tree along the western boundary.

2.5 Site Context:

On the Saint Agnes Road frontage the site is set back from the established building line on both sides. To the eastern Crumlin village side is a row of local shops with living accommodation above and car parking at the front adjoining the boundary wall to Glebe House. To the west is Saint Agnes Terrace, a row of redbrick terraced houses, with a laneway running parallel to the Glebe site boundary. Further north west along Saint Agnes road are located the Former Post and Telegraph Office (Somerville Avenue), Former Parochial School and Looceville House. The front of the Glebe site lies within the Crumlin Architectural Conservation Area.



View towards Crumlin village

- 2.6 To the rear of the Glebe House/ Coruba lands and Crumlin village, the site is bounded by a community building, Moeran Hall, and adjoining small green at the corner of Somerville Drive, a cul de sac of terraced houses on one side facing the boundary wall of the site. To the west lies Somerville Green with its open space at the entrance with the residential housing and rear gardens adjoining the site to the east.
- 2.7 A narrow strip of land in the ownership of South Dublin County Council is included in the application between Somerville Drive and the boundary wall to the Coruba lands.
- 2.8 The general pattern of development to the rear of the site is composed of grid patterns of housing built in the 1950's with associated green spaces and road hierarchy. The direct pedestrian connectivity between Crumlin Village and the housing immediately to the rear of the site is limited.



View towards Somerville Green, Moeran Hall and Somerville Drive

3. Historic Development

- 3.1 A cartographic analysis has been carried by our Conservation Architects, Mullarkey Pedersen Architects, to assist in the understanding of how the site developed through time.
- 3.2 The Down Survey map of the mid-17th century was made at a pivotal time in Irish history. The Down Survey represents Crumlin as it had developed throughout the medieval period, a disputed borderland between the English settlement of Dublin and the surrounding Gaelic Irish hinterland.



Down Survey Map of Crumlin 1656-58



Rocque Map of County Dublin 1760 showing Crumlin

- 3.3 By the mid-eighteenth century, Crumlin had become a satellite village to the city of Dublin to the northeast as can be seen on Roques Map. That period saw the building of substantial suburban houses with gardens along the main village street. These defined its character as an attractive fashionable Dublin suburb

until the mid-20th century. These houses included Crumlin Lodge, Lisle House, Kingsfield House, Innismore House and the Glebe House dating from 1791. St Mary's Church is shown on the map at the north end of the main street.



1st Edition OS Map 1837

- 3.4 The First Edition Ordnance Survey map shows that the form of 18th century Crumlin has survived the upheavals of the late 18th and early 19th centuries. The main street is flanked by large landscaped gardens, orchards and formalised planting associated with these houses. This 18th century built matrix still helps define early 21st century Crumlin. The main street runs from north-west to south-east, flanked by large houses including the Glebe House which is clearly identified. The church to which it relates, St Mary's Church of Ireland, marks the northern end of the main street. St Mary's distinctive tower was the only feature retained when the church was rebuilt and still defines the northern end of the historic core today. As can be seen on the map, the village had gained importance as a service centre to the locality in the early 19th century, with a post office, police station, two schools, dispensary and commercial premises.
- 3.5 The revised Ordnance Survey map of 1869/76 shows that there have been no significant changes to the village in the intervening 30 years. Some thirty years later, the OS Map of 1907 indicates that while the village still retains its early 19th century form there have been a number of changes. The north end of the street has greater built definition with rows of single storey dwellings. To the northwest of the Glebe House a row of two storey suburban houses, the first appearance of a building type which has come to define Crumlin and indeed the rest of County Dublin.

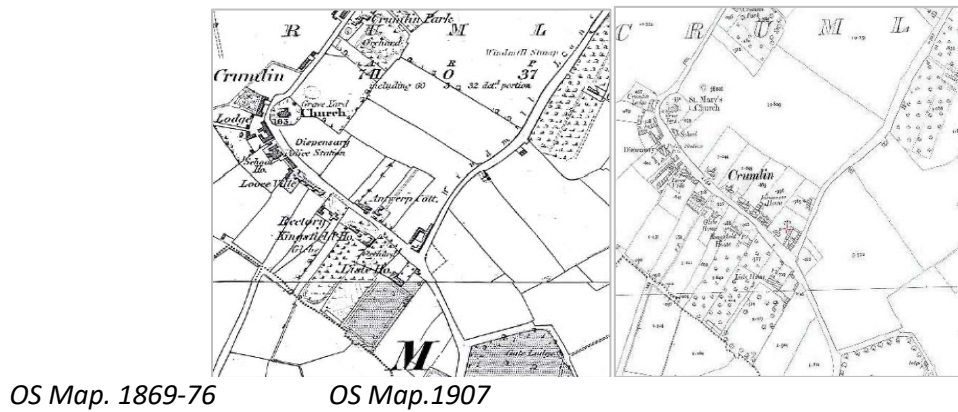


Fig 5: OS Map. 1936-43



Contemporary Aerial View

- 3.6 From the 1930's rows of suburban housing are beginning to spread randomly along St Agnes Park to the south of the historic village which itself still retains its historic form and its essentially rural character. Most of the 18th and 19th century houses are recorded on this map, though local historical sources indicate that several had been abandoned and becoming derelict. The historic field pattern is still retained. The rows of suburban housing were developed by Dublin Corporation as part of a large scale building programme to alleviate overcrowding and poor housing conditions in the inner city. The housing was developed on a garden suburb principle with terraces of houses overlooking green spaces with spacious distributor roads and narrower local roads.

- 3.7 From the 1950's on the village's eighteenth century street pattern was subsumed within this wave of suburban housing which spread out from Dublin City to the northeast. Rows of two-storey buildings were built along the historic main street replacing many of the more architecturally distinguished 18th century houses, which for so long had defined the character of Crumlin. The Glebe House is one of the few of these houses to survive.

4. Recent Planning History

4.1

There was one recent SHD planning permission pertaining to these lands under ref. ABP-309317-21 for 152 no. apartments, café, community room, refurbishment of Glebe House and associated site works granted by An Bord Pleanála on the 13th May 2021. The decision of 13th May 2021 to Grant Permission was quashed by the High Court, the Board consented to its decision being quashed. Judicial Review 2021 No 620 JR

4.2 The following are those relating to the Coruba lands:

- 3415/05 Unit 6, Coruba House – permission granted in September 2005 for the demolition of existing office block and raising of roof level of existing warehouse to accommodate new first floor offices with windows to north, east and west elevations and new cladding to entire building.
- 3062/98 Coruba House - permission granted in March 1999 for the demolition of the existing single storey industrial units and for the construction of 37 no. terraced, single-aspect residential dwelling units on 3 levels, expressed as 2.5 stories high, laid out in 2 interconnecting courtyards. Car parking for 37 no. cars will be underground with ramp access. The development was not carried out.

4.3 Other planning decisions in the vicinity include:

- 2125/21 relates to a Grant of Permission to St Agnes Property Limited for development on lands to the rear of St. Agnes Convent within the Primary Care and Sheltered Housing completed development. The development will consist of: - Construction of 2 no. infill residential buildings of 4 storeys in height each accommodating 8 no. 1 bedroom independent living units (total 16 units) with associated balconies/winter gardens. Application also includes for 2 separate garden rooms, associated site works and services.
- 2572/20 relates to a refusal of permission for development on lands to the rear of St. Agnes Convent, Captains Place, St Agnes Avenue, within the Primary Care and Sheltered Housing development currently being completed for the construction of 2 no. infill residential buildings of 3-4 storeys in height each accommodating 10 no. one bedroom independent living units (total 20 units) with associated balconies/winter gardens, associated site works and services. The reason for refusal considered that the development would seriously injure the residential amenities of occupants and visual and residential amenity of existing units by reason of the height, scale, mass and design and narrow circulation space for the communal space between blocks.

- 4456/19 relates to a Grant of Permission to St Agnes Medical Limited for Permission for development on lands to the side of St Agnes Convent (Captains Place), Armagh Road, Crumlin, Dublin 12 within the Primary Care and Sheltered Housing Development currently under construction. The development will consist of:- Construction of 1 no. residential building of 3 storeys in height, accommodating 12 no. 1-bedroom Independent Living Units, with associated balconies, 6 on-site carpark spaces. Associated site works and services.
- 4364/19 relates to a split decision to Canmar Properties to Grant and Refuse a development at Thomas Moore Road, Walkinstown on a site bounded and accessed by both Walkinstown Road and Balfe Road, comprising of Balfe Road Industrial Estate (2-4 Balfe Road), Walkinstown Road Surface Car Park and lands and industrial building (5 Walkinstown Road) to the rear of houses on Walkinstown Road and Thomas Moore Road, Walkinstown, Dublin 12 The development will consist of:- 1.) The demolition of all existing buildings on site; 2.) The construction of a mixed use commercial and residential development in 6 no. blocks accommodating 2 no. commercial units, a communal meeting space and 70 no. residential units. An Bord Pleanála in its decision refused permission for Block 4: two-storey residential block accommodating four number apartments, Block 5: two-storey residential block accommodating four number apartments and Block 6: two-storey plus attic level residential block at the southern end of the site.
- 3957/17 relates to a Grant of Permission to Seabren Developments Ltd, for a development consisting of: (i) demolition of all existing out-buildings on site; (ii) removal of two-storey rear return extensions and renovation of existing dwelling at No. 89 Cromwellsfort Road; (iii) construction of 12 no. infill houses with car parking and private rear garden.
- 2326/17 relates to a Grant of Permission to On Track Developments Ltd at Site approximately at No. 119, Drimnagh Road, Dublin 12, for the provision of a four storey mixed- use building (1,890 sqm) which will include 1 No. retail unit (237 sqm) and associated retail back of house accommodation at ground floor level and 14 No. residential units at the upper levels comprising 2 No. one bedroom apartments and 12 No. two bedroom apartments.
- 2881/12 (ABP Ref 29S.241889) Saint Agnes Convent, Armagh Road, Crumlin – Permission granted following third party appeals for development of:- 1) Renovation and change of use of the existing convent building from convent use to use for medical and health services; 2) Construction of a new 3 storey building (c.2,598m²) connected to the convent building to accommodate a medical Primary Care Centre with incorporated Pharmacare Centre, café; GP suites; medical treatment rooms; HSE administration and ancillary service areas and staff facilities. This development is now completed and in operation.

- 2882/12. (ABP Ref 29S.241890) was a concurrent planning application granted in March 2013 to the Sisters of Charity for the playing fields located to the south for a new residential care facility comprising a four storey, 122 bedroom nursing home building and for 120 no. independent living units in 6 no. sheltered accommodation 3-4 storey buildings, with surface level car parking for 59 cars. The permission granted reduced the number of independent units to 97 by a reduction in the height of the buildings.
- 2019/11: The Dispensary, Cashel Road, Kimmage, Dublin 12 – Permission granted subject to conditions for the partial demolition, conversion and reconstruction of the former dispensary building into 2no. one bedroom ground floor and 1no. two bedroom first floor self-contained apartments, and the construction to the rear of the site of 2no. single and two storey semi-detached houses including on-site support accommodation.

5. An Bord Pleanála Pre-Application Consultation

Ref: ABP -311973-21

Pre-application documentation was submitted on the 17th Nov 2021 and the tripartite meeting was held on the 21st February 2022.

The Opinion issued by An Bord Pleanála on the 28th February 2022 stated that the Board had considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of 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 under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

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

This is addressed in a separate document prepared by Doyle Kent Planning as a response to the Opinion. The layout has been amended to respond to the issues raised in the Opinion and the submission by the Dublin City Council.

6. Proposed Development

6.1 The design rationale for the proposed development is set out in detail in the Design Statement prepared by Reddy Architects (RA+U) and the design process has evolved having regard to *the Urban Design Manual- A best Practice Guide* (2009) and the accompanying document to the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009). This manual establishes 12 criteria that residential development should be assessed against. The design rationale has also been informed by the following:

- Need for housing supported by Government policy within the Dublin Metropolitan Region
- Zoned for residential development by Dublin City Council
- The location within the metropolitan area of the city
- Pedestrian, cyclist, transport and car accessibility
- Redevelopment of an underutilized brownfield site
- Reuse for residential purposes and the conservation of a Protected Structure
- Location in Crumlin with residential Neighbourhood which can support future residents
- Suburban location close to public parks and other recreational amenities and a
- The development plan and national planning guidelines
- Urban Development and Building Heights Guidelines
- Apartment Design Guidelines
- Design Manual for Urban Roads and Streets (2013 amended 2019) DMURS
- Irish Water feasibility to connect to existing drainage network and capacity in the network for both foul and wastewater
- The pattern of development in the area
- Feedback from the Planning Authority and An Bord Pleanála following the Stage 1 and 2 process.

6.2 The subject site is located at Glebe House (Protected Structure, RPS Ref. 7560), including the vacant Glebe light industrial lands, and the vacant site of the former Coruba House, Saint Agnes Road, Crumlin, Dublin 12 all on a site of 0.88 Hectares. The site bounds Somerville Drive and Somerville Green to the southeast and southwest, respectively, and includes the grass margin between the Coruba site boundary and Somerville Drive.

6.3 The development will consist of the following:

A residential development of 150 no. apartments consisting of 74 one beds, 72 two beds and 4 three bed residential units, a creche and café. The proposed scheme has an overall Gross Floor Area of 15,767 sq.m.

Two apartment buildings are proposed ranging in height from 4 – 6 storeys and linked by a carpark at ground floor and a podium at first floor level comprising the following:

- Block A is 5-6 storeys and consists of 79 apartments and includes 35 no. one beds and 44 no. two beds units, ESB substation/switch room/metering room of 85sqm, 42 no. secure bicycle storage and bin storage of 44sqm
- Block B is 4-5 storeys and consists of 66 apartments and includes 38 no. one beds, 25no. two beds and 3 no. three beds, a Creche of 147 sqm at ground floor level with associated outdoor area, ground floor plant rooms of 74sqm, ESB substations/switch room/metering room/telecoms of 89sqm, 188 no. secure bicycle storage spaces in two locations, 6 no. motorbike spaces and bin storage of 75sqm.

Two no. three storey pavilion buildings either side of Glebe House to accommodate:

- One number two storey duplex 2 bed apartment above one number 1 bed apartment at ground floor in the north west pavilion and
- One number two storey duplex 2 bed apartment above a 55 sqm ground floor café, in the south east pavilion.

The repair of fire damaged elements (following a fire 21st April 2022) and the refurbishment of Glebe House, a protected structure, into two apartments, one number 2 bed unit at lower ground floor and one number 3 bed unit at upper ground and first floor:

- Repair of fire damaged elements including the replacement of all roof coverings and structure, replacement of all first floor timber stud walls, replacement of first floor rear return joists, replacement/repair of floor joists at first floor level, replacement of internal render to kitchen/dining area in rear return building and replacement/repair of stair from upper ground to first floor level,
- The refurbishment of Glebe House including the removal of extensions to the rear and sides of the building, restoration of the façade, replacement of pvc windows with sliding sash windows and associated works to the interior and to the curtilage of Glebe House.
- Lowering the front boundary wall and return boundary wall to the front of Glebe House.

Demolition of all workshops, offices and sheds to the rear and sides of Glebe House
Demolition of boundary walls around the Coruba land on Somerville Drive, the front entrance and between Coruba and the Glebe lands. Demolition of non-original brick column's at St Agnes Road entrance to Glebe House (1,636 sqm).

75 car parking spaces are proposed:

- 66 no. car parking spaces (includes 2 Go Car spaces) in ground floor car park below podium and partly in Block A and 4 No. visitor car parking spaces in front of Glebe House all with vehicular access from St Agnes's Road
- No. assigned car parking spaces on the eastern side of Block B with vehicular access from Somerville Drive.

The development provides 905 sqm of Public Open Space to the front and side of Glebe House, and within the southeast public plaza. with a pedestrian route to the side of the Café at Pavilion B and 1,632 sqm of Communal Open Space located at podium level and to the rear of Block A.

76 no. visitor bicycle parking spaces are provided in the public accessible areas of the site.

The application also includes the provision of a new footpath along the south-eastern boundary at Somerville Drive, a new controlled gate between Somerville Drive and St Agnes Road allowing public access through the site within daylight hours and a new pedestrian access from the public open space onto St. Agnes Road, boundary treatment, landscaping, Solar Panels on the roof of Blocks A and B, provision of 4 no. Microwave link dishes to be mounted on 2 No. steel support posts affixed to the lift shaft overrun on Block A, lighting, services and connections, waste management and other ancillary site development works to facilitate the proposed development.

6.4 Summary

This development proposes a residential scheme providing 150 residential units with a mix of one beds, two beds and four three beds. The development will include a Creche of 147 sq.m with associated outdoor play space in Block B and ancillary support accommodation such as plant rooms, refuse stores, ground floor podium car parking and secure bicycle store for 233 bicycles. The creche facility will be provided at ground floor level along the landscaped plaza. A controlled pedestrian access route is proposed through the east of the site to be open to the public during daylight hours. This provides a new connection to Somerville Drive and to the wider area beyond during daylight hours. A café of 55 sq.m is provided adjacent to Glebe House in a new Pavilion building with external terrace for outdoor seating en route to the main apartment block entrance .

The overall design concept for the scheme is based on delivering a high quality residential development that responds to the existing context in Crumlin village and seeks to create an integrated, permeable and sustainable community in Crumlin. The proposed residential development respects the cultural heritage of Glebe House and maximises the site's potential to provide a high quality residential development. The site has its primary access from St Agnes Road following through to the village of Crumlin.

The design is predicated on a response to the setting of the Protected Structure and its immediate context to create a high quality residential development.

The scheme adopts an appropriate height strategy in relation to Crumlin village and the neighbourhood context. The site adjoins the community centre, Moeran Hall, on the southern boundary on Somerville Drive with public open spaces on either side.

This allows for the introduction of the taller element of the apartment scheme at this location. The site can support a high density residential development given its location within Crumlin village, close to a high capacity and frequency bus network, proximity to urban employment centres, schools and a number of public parks.

The main element of the development is broken down into two 'L' shaped blocks modulated in height to respond to Glebe House and the surrounding streetscapes. The two Pavilion buildings either side of Glebe House help to anchor the house into its new urban context. With the provision of a new pedestrian connection, this provides a key design feature which provides pedestrian permeability between Crumlin village to the South East towards Somerville Drive.

6.5 Appropriate Assessment

A Screening report for Appropriate Assessment has been prepared by Openfield Ecology as part of the application for this residential development.

In accordance with the 2000 Planning and Development Act, the proposed development has to be assessed to determine if the proposed development could have 'likely significant effects' on any Natura sites. The screening document provides supporting information to assist the competent authority with an Appropriate Assessment screening exercise, including: a description of the proposed development, details of its environmental setting, a map and list of Natura 2000 sites within the potential zone of impact, and an assessment of potential impacts. It is concluded that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.

6.6 Ecological Impact Assessment

An Ecological Impact Assessment has been prepared by Openfield Ecology as part of the application for this residential development. In summary, the development site is artificial land within a built-up area with small areas of open or green space. There are no examples of habitats listed on Annex I of the Habitats Directive or records of rare or protected plants. Spanish Bluebell, a species listed as alien invasive as per SI 477 of 2011, was found in one location. There are no locally high value habitats and features are of limited value even for common and widespread species.

Two separate bat surveys were carried out and one bat report has been prepared to accompany the ecological assessment of the site. The report prepared by Altemar ecological consultants and licensed bat specialists were appointed in 2021 to update bat surveys previously completed on the site in July 2020. No evidence of bat activity was noted within the buildings on site in 2020 or in 2021. No signs of potential bat activity were noted externally. No bats were observed emerging from the buildings on site.

6.7 Environmental Impact Assessment Screening (including a statement under 299B)

Screening is the term used to describe the process for determining whether a sub-threshold development is likely to have a significant effect on the environment and if it requires an Environmental Impact Assessment (EIA) by reference to the type and scale of the proposed development and the significance or the environmental sensitivity of the receiving environment. This information is provided to assist the Board in considering whether there are likely significant effects on the environment and determining whether an EIAR is required.

A screening report has been prepared by AWN Consultants and accompanies the application. The report has assessed the potential impact of the proposed development on the environment. The proposed development is below the thresholds for mandatory EIA.

AWN has considered the proposed development and assessed the potential for significant environmental effects and the need for an EIAR is documented in the Screening Report. It is considered that:

- Compliance with the Preliminary Demolition, Construction and Waste Management Plan (PDCWMP) prepared by Cora Consulting Engineers will prevent potential short-term nuisances (such as dust, noise and vibration, and traffic) and risks from the storage of any hazardous substances (fuels, chemicals and other construction materials that may pose a risk to the environment).
- Compliance with the accompanying PDCWMP will ensure best practice methodologies employed for the control, management, monitoring and disposal of waste from the site.
- The proposed drainage and flood risk strategy will contribute to improved retention of surface water on site and controlled discharge. (Note The SuDS features associated with the proposed development are not included within the design to avoid or reduce any potential harmful effects to any European sites.)
- The AA Screening Report (Openfield) considered that the only sites within the zone of influence that are at risk of significant effects are four European sites, South Dublin Bay and River Tolka Estuary SPA (site code: 4024), the South Dublin Bay SAC (site code: 0210), the North Bull Island SPA (site code: 4006) and the North Dublin Bay SAC (site code: 0206). The AA Screening Report concluded that *‘that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available’*.

The site makes optimum and sustainable use of a brownfield site and will use existing servicing provision as well as being located in close proximity to high-capacity public transport links and will have a neutral long term impact on material assets. AWN has concluded that there are no likely significant environmental effects on the receiving environment from the proposed development, which would require the preparation of an EIAR.

A mandatory EIA is not required for the proposed development as set out by AWN in their Screening report.

As required by Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001, as amended, the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account within the EIA Screening Report. A standalone Regulation 299B(1)(b)(ii)(II)(C) Statement has also been provided as part of this application.

6.8 Part V – Social and Affordable Housing

As part of the S247 pre-application consultations with Dublin City Council, Part V Social and Affordable housing units are proposed. The letter from Dublin City Council, dated 1st June 2022 has confirmed their preference to acquire units on site.

The Part V units are identified on plan and schedules submitted. We refer An Bord Pleanála to the R+U architects Part V report enclosed which details the proposed location of the Part V units, the floor plans, elevations and layouts for the units and the appropriate costings provided by the Applicant

The current proposal includes 20 units on the site representing 10% of all units on the Glebe lands and 20% on the Coruba lands.

6.9 Flood Risk Assessment

The site and development proposals have been considered in accordance with the requirements of “The Planning System and Flood Risk Management Guidelines for Planning Authorities” 2009, published by the Department Environment, Heritage and Local Government.

A Site Specific Flood Risk Assessment (SSFRA) has been carried out by Cora Consulting Engineers and the findings indicate that the proposed development is in accordance with OPW Flood Risk Management Guidelines. The SSFRA did not find any indicators of the proposed development being at risk from fluvial or groundwater flooding. The assessment did identify that there could be potential for pluvial flood risk within the development site related to rainfall exceeding the infiltration rate of the ground. It noted that the entire site is not at risk from pluvial flooding but that the flood extents are concentrated to the centre of the site corresponding with lower existing site ground levels which correspond to the lower ground floor level of Glebe House. This has been assessed for Flood risk and is outside the predicted scope of flooding for the site. The SSFRA did not find any indicators that the proposed development would give rise to flood risk elsewhere.

The Site Specific Flood Risk (SFRA) confirms that the site is located within Flood Zone C and concludes that the proposal is appropriate in the context of the flood risk assessment carried out.

6.10 Engineering Services

Cora Consulting Engineers have prepared an Engineering Services Report to accompany the planning application. The report assesses the following:

- Stormwater Drainage Infrastructure;

- Foul Drainage Infrastructure;
- Potable Water Infrastructure.

The drainage network for the proposed development has been designed in accordance with the Regional Code of Practice Drainage Works, the Greater Dublin Strategic Drainage Study and the Irish Water Code of Practice for Wastewater Infrastructure.

6.11 Access and Traffic

A detailed Traffic Impact Assessment Report has been prepared by NRB consulting engineers.

The Transportation Assessment confirms that the established existing road network, and the access junction, are more than adequate to accommodate the worst-case traffic associated with the development. The assessment also confirms that the construction and full occupation of the scheme will have a negligible impact upon the operation of the adjacent road network.

In terms of number of transport alternatives easily available to residents, it is considered that the proposed development is highly sustainable, in terms of current & future public and alternative transport accessibility. The proximity of the development to existing & future public transport services means that all residents will have viable alternatives to the private car for accessing the site and will not be reliant upon the car as a primary mode of travel. A Preliminary Mobility Management Plan is included within the Transport Assessment. Direct and high-quality pedestrian linkages are provided between the site and the existing pedestrian/cycling facilities on the surrounding road network. The ratio of car parking to the number of residential units at 0.5 per unit will also act as a demand management measure, ensuring that the development is accessed in the most sustainable manner. The layout of the proposed development seeks to maximise permeability and enhances legibility, and the design of development actively contributes to a highly permeable and accessible community for both pedestrians and cyclists.

The report includes a Statement of Consistency with DMURS and confirms that the internal layout is compliant with the requirements. An independent Stage 1 Road Safety Audit, together with the Designer Feedback form, has been undertaken and does not raise any issues in relation to road safety. The report also includes a Bus Capacity/Demand Report to demonstrate the capability of the existing public transport to serve the development.

The report concludes that there are no adverse traffic/transportation capacity or operational safety issues associated with the construction and occupation of the proposed residential apartment development which would prevent planning permission being granted.

6.12 Construction and Demolition Management /Waste Plans

A Preliminary Demolition and Construction Waste Management Plan (PDCWMP) prepared by Cora Consulting accompanies the application. There will be potential for noise and dust nuisance during construction. Standard noise and dust prevention measures will be employed.

The purpose of the Demolition Plan is to provide information necessary to ensure that the management of construction and demolition (C&D) waste at the site is undertaken in accordance with current legal and industry standards. In particular, the Plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also provides guidance on the appropriate collection and transport of waste from the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

6.13 Landscape

A detailed landscape strategy has been prepared for the site and includes detailed drawings prepared by Ait Landscape Urbanism and Landscape. The landscape proposals for Glebe House set out to create a scheme of high-quality design and materiality that compliments the urban design strategy for the site, which will seek to sensitively restore Glebe House and rejuvenate its surrounds while increasing the permeability of the development site by forming new quality links to Crumlin Village and the local area. A series of legible spaces with an increasing level of privacy will begin at a newly created pocket park forming a public open space to the front of Glebe House, gradating to more semi private and private open spaces within the context of the new residential blocks, with communal open spaces comprising an over podium garden & open space to the rear of Block A.

6.14 Microclimate

Wind

AWN Consulting Ltd. (AWN) were commissioned to undertake an assessment with regard to Microclimate Effects associated with the a proposed residential development. The aim of the assessment was to determine if there was considered to be potential microclimate effects with a particular focus on wind-speed impacts.

The site of the proposed development was characterised as a site which experiences average wind speeds which corresponds to a gentle breeze on the Beaufort Wind Scale (B3). Based on the analysis conducted it was concluded the proposed development would have no impact with regard to microclimate.

Acoustic Design Statement

AWN Consulting has been commissioned to carry out a study in relation to the potential noise impacts from the proposed residential development at the lands at Glebe House.

A baseline noise survey has been undertaken at the development site to determine the existing environment at the site.

Outward noise impact assessments have been undertaken for both construction and operational phases of the proposed development.

Construction noise thresholds have been selected and noise predictions have been undertaken. The predictions indicate that at the nearest noise sensitive receivers, noise from construction activities is predicted to be above the threshold at which a likely significant impact will occur. Appropriate construction mitigation measures have been presented within

this report in order to reduce the impact of construction activities on nearby sensitive receptors.

Once operational, it is expected that noise emissions will be limited to noise associated with traffic coming to and from the development and plant items serving to the development. With reference to the Transportation Assessment prepared for the scheme, traffic associated with the development is low and associated noise levels are expected to be imperceptible. It is understood that plant items serving the development will be located internally and therefore it is expected that noise emissions to atmosphere will be minimal. Plant items serving the proposed development will be designed such that the cumulative noise emissions will achieve the noise criteria as set out in the noise assessment.

6.15 Operational Waste Management Plan

AWN has prepared the Operational Waste Management Plan (OWMP) for the proposed development. This OWMP has been prepared to ensure that the management of waste during the operational phase of the proposed residential development is undertaken in accordance with the current legal and industry standards including, the Waste Management Act 1996 as amended and associated Regulations.

The OWMP provides a robust strategy for storing, handling, collection and transport of the wastes generated at the site. The OWMP aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. The plan estimates the type and quantity of waste to be generated from the proposed development during the operational phase and provides a strategy for managing the different waste streams.

6.16 Lifecycle Report

A Life-Cycle Report has been prepared by Reddy A+U for the proposed residential development. The purpose of the report is to provide an initial assessment of long - term running and maintenance costs as they would apply at the time of application, as well as demonstrating what measures have been specifically considered to effectively manage and reduce costs for the benefit of the residents.

6.17 Daylight/ Sunlight and Overshadowing Report

A Daylight/ Sunlight and Overshadowing Report has been prepared by IES Consulting Engineers to accompany the planning application. The report summarises the analyses undertaken to quantify the Sunlight and Daylight performance of the proposed residential development. The report focuses on quantifying the daylight and sunlight impact to the surrounding dwellings as well as the daylight and sunlight performance within the proposed development.

The Sunlight/Daylight report prepared by IES demonstrates compliance with the BRE Guidelines and relevant EU standards.

Shadow Analysis: The shadow analysis illustrates different shadows being cast at key times of the year (March 21st, June 21st and December 21st) for the Existing Situation and the Proposed Scheme.

The results from the study indicate that for Somerville Green additional shading was observed from the proposed development on these existing residential properties during the months of

March (0800) and December (0800-1400) with no additional shading noted at any other point through the year. At St Agnes Road minor additional shading was observed from the proposed development on a small number of existing residential properties during the month of December (1400). No additional shading was noted at any other point through the year. At St Agnes Terrace additional shading was observed from the proposed development on a number of existing residential properties during the months of March (0800 -1000) and December (0800-1400). No additional shading was noted at any other point through the year. At Somerville Drive minor additional shading was observed from the proposed development on these existing residential properties during the month of June (1800-2000). No additional shading is noted at any other point through the year.

Sunlight to Amenity Spaces

Existing Amenity Spaces: The existing communal and private amenity spaces in the adjacent properties have been analysed and the results demonstrate they continue to receive the same level of sunlight even with the proposed development in place on March 21st, thus complying with the recommendations in the BRE Guide.

Proposed Amenity Spaces: On March 21st 88% of the combined proposed public amenity spaces and 60% of the combined proposed communal amenity spaces provided within the development will receive at least 2 hours of sunlight over the total area provided, thus exceeding the 50% recommendation noted in the BRE Guide. In addition, all individual spaces meet the BRE recommendations confirming the amenity areas provided will be a quality spaces in terms of sunlight."

Sunlight to Existing Buildings: This study considers the proposed scheme and tests if the Annual Probable Sunlight Hours (APSH) results for the living room windows are greater than 25% annual and 5% winter sunlight or are greater than 0.8 times their former value with the proposed development in place. When compared to the Existing Situation, of the 13 no. points tested on St Agnes Road, 100% (13 no. points) meet the annual and winter recommendations outlined in the BRE Guide. Therefore, the Proposed Scheme has a negligible impact when compared to the Existing Situation. Based on the BRE guidance, 13 windows of the existing neighbouring dwellings were included within the APSH assessment as the rest did not meet the criterion as laid out within the BRE guide.

Daylight to Existing Buildings: This study considers the Proposed Scheme and tests if the Vertical Sky Component (VSC) results are greater than 27% or not less than 0.8 times the value of the Existing Situation. When compared to the Existing Situation, of the 111 no. points tested, 95% (105 points) have a Proposed VSC value greater than 27% or not less than 0.8 times their former value compared to the Existing Situation. The remaining 6 points have VSC values of 25 to 26% which is just below the 27% recommendations. Therefore, the Proposed Scheme has a negligible impact when compared to the Existing Situation and complies with the BRE guidance.

Daylight to Proposed Development: For the daylight to proposed development assessment, three standards have been analysed: BRE Guide / BS 8206-2:2008, IS EN 17037:2018 and BS EN 17037:2018 National Annex. The results under each standard are summarised in the IES Report.

Under the BRE Guide / BS 8206-2:2008 across the proposed development, 95% of the tested rooms are achieving Average Daylight Factors (ADF) in accordance with the BRE Guide / BS

8206-2:2008 when Living/Kitchen/Dining spaces are assessed as whole rooms against a 2% ADF target and Bedrooms against a 1% ADF target.

The report notes that the majority of rooms that are failing are located on the lower floors. However, overall, the quality of daylight provision across the development can be considered high.

In terms of compensatory measures with regards to internal daylighting the reports sets out a rationale for alternative, compensatory design solutions. Having regard to the 5% non-compliance the design team reviewed the development to maximise the daylight within the proposed scheme. Initial testing produced daylight results of 89% for the 2% target. Optimisation solutions were tested which included the following: Increased window sizes to improve daylight provision to the apartments. The introduction of this design solutions improved the daylight to the scheme as a whole as anticipated producing final daylight results of 95% for the 2% ADF target.

In addition to this, design features have been incorporated into the development where rooms do not achieve the daylight provision targets in accordance with the standards they were assessed against. These design features again help to balance off and compensate the lower levels of daylight measured in the applicable spaces and are summarised as follows: 69% of the apartment units (104 no. of 150 no.) have a floor area 10% greater than the minimum floor area requirements as required by the Design Standards. Note that larger floor areas make it more difficult to achieve the recommended daylight levels.

59% of the apartment units are dual aspect which is above the 50% minimum requirement. As a result, more apartment units than the recommended minimum will achieve quality daylight from dual aspect orientations.

An additional 94% of communal open space above the minimum requirements (838 sq m) required by the Design Standards (Dec 2020) is proposed across the development.

An additional 3% of public open space (905 sq. m.) above the minimum requirements (10% = 878 sq. m) required by the Dublin City Development Plan 2016-2022 is proposed across the development which provides additional residential amenity

6.18 Archaeological Heritage

An Archaeological Assessment has been prepared by ACSU Archaeology, which accompanies this SHD application. The report notes that the site contains no Recorded Monuments, while the nearest such are located c. 120m to the northwest and comprise a graveyard (RMP DU018-038002-) and ecclesiastical enclosure (RMP DU018-038003-), with an associated church (RMP DU018-038001-). These will not be directly affected by the proposed development.

6.19 Conclusion

The proposal is for a high-quality residential development on residentially zoned lands adjacent to established residential housing and recreational amenity. The proposed development incorporates a café and a creche providing an active community element, which can serve the existing development and surrounding area. The proposal achieves the government policy of providing much needed housing on these lands in the south suburbs of the city.

In line with the Development Plan policy the proposed development will provide a residential development on under-utilised lands in an established outer city suburb of Dublin on a zoned residential site. All of the constraints of the subject site have been incorporated and addressed appropriately within the development to create a high-quality residential scheme providing a new public open space to the front of Glebe House.

7. Statement of Consistency

This Statement of Consistency addresses the requirement of the prescribed application form which requires:

(A) A statement that, in the prospective applicant's opinion, the proposed strategic housing development is consistent with relevant guidelines issued by the Minister under section 28 of the Planning and Development Act 2000.

(B) A statement setting out how the proposed strategic housing development will be consistent with the relevant objectives of the relevant development plan.

There is a general obligation to “have regard” to Ministerial Guidelines. Additionally, Section 9(6)(b) of the Planning and Development (Housing) and Residential Tenancies Act provides:

(b) Where specific planning policy requirements of guidelines referred to in paragraph (a) differ from the provisions of the development plan of a planning authority, then those requirements shall, to the extent that they differ, apply instead of the provisions of the development plan.

7.1 National Policy

- Project Ireland 2040 - National Planning Framework
- National Development Plan 2018-2027
- Rebuilding Ireland – Action Plan for Housing and Homelessness
- Housing For All- A New Housing Plan For Ireland (Sept 2021)
- Transport Strategy for the Greater Dublin Area 2016-2020
- Draft Greater Dublin Area Transport strategy 2022- 2034
- Bus Connects: Transforming City Bus Services 2018

7.2 Regional Policy

Regional Spatial & Economic Strategy (RSES) 2019

7.3 Section 28 Guidelines

- Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018) (as amended 2020)
- Urban Development and Building Heights (2018)
- The Planning System and Flood Risk Management (2009)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)
- Urban Design Manual - A Best Practice Guide (2009)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Urban Design Manual - Best Practice Guidelines (2009)
- Guidelines for Planning Authorities on Childcare Facilities (2001)

7.4 Local Planning Policy

- Dublin City Council Development Plan 2016-2022

National

7.1.1 Project Ireland 2040 - National Planning Framework

The National Planning Framework (NPF) guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development. The National Strategic Outcomes are expressed as follows:

1. Compact Growth - recognising the need to deliver a greater proportion of residential development within existing built-up areas. Activating these strategic areas and achieving effective density and consolidation, rather than sprawl of urban development, is a top priority.
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenities and Heritage
8. Transition to a Low Carbon and Climate Resilient Society
9. Sustainable Management of Water, Waste and other Environmental Resources

Access to Quality Childcare, Education and Health Services

One of the principal elements of the NPF's overall strategy for spatial planning (NPF Sections 1.3 and 2.6) is compact growth, which will include:

NPO 2a seeks to target and focus 50% of future population and employment growth in the existing 5 no. cities and suburbs, NPO 3b aims to deliver at least 40% of new homes nationally within the envelope of existing urban settlements, and NPO 3b seeks to deliver at least 50% of all new homes in the 5 no. cities and suburbs.

With reference NPO 3a, the proposed development accords with the NPF, in particular with its principles of compact growth and the reinforcement of the country's existing urban structure at all levels. In this respect the subject site is located in Crumlin Village within Dublin

City. The area of the site on which the residential units are proposed is zoned residential and the delivery of additional housing on brownfield lands is in accordance with the National Planning Framework (NPF) .

The proposed development will provide 150 no. residential units in the suburb of Crumlin within the metropolitan area of Dublin City within the M50.

The present application meets the objectives of the NPF in that it will consolidate residential developments in Crumlin within suburban Dublin on what is a residentially zoned site.

National Policy Objective 4 states *“ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well- being”*. The proposed development will provide for a high quality of residential units in accordance with the Apartment Guidelines 2020. The proposed materials and finishes will also be of a high-quality standard to create a unique quality suburban neighbourhood. The proposed development will also provide for café as well as a creche which will integrate the existing and future residential communities.

It is considered that the proposed development provides for the creation of an attractive, high quality, sustainable new residential community within the outer suburb of the city. The provision of the new sustainable residential neighbourhood is therefore consistent with the NPF objective. The proposed development will provide for high density residential development in an existing urban area in proximity to public transport facilities. The proposed development will also provide for a café and creche which will encourage the local residents into the site.

In relation to NPO 4, the proposed development will create a high-quality, attractive and liveable place for future residents. The landscaping proposal will provide high-quality public and communal open spaces for the residents and the general public to enjoy. The proposal in compliance with NPO4 will provide an attractive, liveable well designed high quality urban place, which will enjoy a high quality of life and well-being.

Several other policy objectives may be considered applicable to this development.

National Policy Objective 11

‘In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.’

With regard to NPO 11, the proposed development is located on residentially zoned lands within the Dublin City Council Development Plan 2016-2022, in Crumlin, which has a wide range of local shops, restaurants and cafes, and is well served by public transport with a high capacity bus route to the north and south within walking distance of the site. The existing site is vacant and underutilised and presents an appropriate site for a development that encourages more people and activity.

National Policy Objective 13

'In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.' The NPF also states that "to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas".

In accordance with NPO 13, there is a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed building height ranges from 3 no. storeys to 6 no. storeys and is considered appropriate given the context of the site within the urban area. The proposed density and height of the development is considered appropriate for the location of the site and the availability of public transport facilities and proximity to supporting services and amenities. The proposed development is therefore in accordance with the objectives of the NPF in this regard.

National Policy Objective 27

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

With regard to NPO 27, the proposed development is designed to minimise reliance on private car use and encourage sustainable modes of transport. The car parking provision proposed (75 Spaces), and high levels of cycle parking (306 no. spaces) is to encourage a sustainable alternative mode of transport to the motorcar. The NPF seeks to minimise car-parking in accessible locations and to maximise a modal shift to public transport due to proximity to public transport routes

The proposal incorporates a permeable development which encourages cycling, walking and connectivity to existing roads, public transport and local facilities.

National Policy Objective 28

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

The scheme proposes apartment units in an area where apartments are relatively limited, allowing choice to smaller family units and to older people looking for smaller apartment dwellings. The development will be owned and operated by a housing association which will integrate cost rental and social housing units in a mix of unit typologies.

National Policy Objective 32

'To target the delivery of 550,000 additional households to 2040 National Policy.'

The proposed development contributes to this objective.

National Policy Objective 33

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

In accordance with NPO 33, new homes will be provided at a sustainable location, with access to existing services and facilities. The proposal is located within Crumlin close to its wide ranging retail offer and amenities.

National Policy Objective 35

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

In accordance with NPO 35, the proposal will increase residential density to 171 units per ha which is considered appropriate for this site which is located within the established residential area of Crumlin with good quality public transport options. The proposed residential scheme on this brownfield site represents an opportunity to provide for increased densities and some increased height (Part of Block A is 6 storeys) in accordance with the NPF policies and objectives. The reuse of the vacant Glebe House a Protected Structure into two residential units accords with this policy. The subject site is located within the metropolitan area of Dublin City which is identified for significant residential growth to 2040. The proposed development seeks to deliver a significant quantum of residential development at a site that is located within a well-established Local Centre location within easy walking distance of a wide range of services, public transport and amenities.

The NPF provides for a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed development ranging in height from 2 no. storeys to 6 no. storeys is therefore considered appropriate in this location and in accordance with the NPF.

National Development Plan 2018-2027

The National Development Plan sets out the investment priorities that will underpin the successful implementation of the new National Planning Framework (NPF). This will guide national, regional and local planning and investment decisions in Ireland over the next two decades, to cater for an expected population increase of over 1 million people.

Housing Challenge

Resolving the systemic factors underlying the current housing crisis is at the heart of the NPF and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. By 2040 the population of Ireland is expected to reach almost 6 million with a need for 550,000 more homes and the creation of 660,000 additional jobs to achieve and maintain full employment. The need to provide in excess of half-a- million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short- to medium-term to respond to the existing deficit that has given rise to the housing crisis.”

The proposed development provides 150 new residential units on residentially zoned lands at appropriate density and mix along with the provision of social housing mixed throughout the development. The proposed development accords with the National Development Plan.

Rebuilding Ireland – Action Plan for Housing and Homelessness

Rebuilding Ireland was launched in 2016 with the objective to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing stock and laying the foundation for a more vibrant and responsive private rented sector. Rebuilding Ireland is set around 5 no. pillars of proposed actions. Pillar 3 seeks to – Build More Homes: Increase the output of private housing to meet demand at affordable prices.

The proposal will deliver much needed housing within the Metropolitan Area of the Greater Dublin Area in accordance with the aims of Rebuilding Ireland, and in particular Pillar 3, which seeks to build more homes – “to increase the output of private housing to meet demand at affordable prices.”

In addition, the proposed development is located within a sustainable location, within an established Local Centre within walking distance of a high frequency/capacity Quality Bus Corridor.

Overall Consistency with National Policy

The proposed development of 150 new homes on the Glebe House/ Coruba site accords with the NPF, in particular with its principles of compact growth and the reinforcement of the country’s existing urban structure at all levels. Where housing policy is concerned, the proposed development accords with the NPF’s core principles for housing delivery – in particular that the location of new housing be prioritised in existing settlements.

The NPF seeks to influence the location of new housing development and future population growth and targets the location of 40% of new housing development within and close to the existing ‘footprint’ of built-up areas over the lifetime of the framework. In this respect the subject site is located within the outer area of the city. The area of the site on which the residential units are proposed is zoned for new residential development and is in accordance with the National Planning Framework.

The proposed development will provide for high density residential development in an existing urban area in close proximity to public transport facilities. The proposed development will also provide for café and creche at ground floor level which will encourage more people and activity within an existing urban areas.

The proposal will provide an attractive, liveable well designed high quality urban place, which will enjoy a high quality of life and well-being.

In accordance with National Policy Objectives, new homes will be provided at a sustainable location, with access to existing services and facilities. The proposal is located within Crumlin village close to neighbourhood retail and other local services. In accordance with National Policy Objective 35, the proposal will increase residential density (171 units per hectare net).

The proposed development for a residential scheme on this brownfield site represents an opportunity to provide for increased densities and increased heights in accordance with the

NPF policies and objectives. The NPF provides for a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed development ranging in height from 3 no. storeys to 6 no. storeys is therefore considered appropriate in this location and in accordance with the NPF.

Housing For All

Housing For All – A New Housing Plan for Ireland sets out targets to improve Ireland’s housing system. The plan sets out that over 300,000 new homes will be built by 2030, which will include a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.

Housing for All provides four pathways to achieving four overarching objectives:

- Supporting Homeownership & Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock. Each of the pathways contains a comprehensive suite of actions to achieve the objectives.

The proposal will deliver much needed housing within the Metropolitan Area of Dublin and will provide for new residential development, built to a high standard and quality, close to a range of amenities and services, within walking distance to high quality high frequency public transport services

The proposed development will support the achievement of the pathways outlined above by providing new housing supply on lands zoned for residential development.

7.1.2 Transport Strategy for the Greater Dublin Area (2016-2035)

The Transport Strategy for the Greater Dublin Area promotes the consolidation of the Metropolitan Dublin area allowing for the accommodation of a greater population than at present, with much- enhanced public transport system, with the expansion of the built-up areas providing for well-designed urban environments linked to high quality public transport networks, enhancing the quality of life for residents and workers alike.

The strategy’s primary policy notes that Ireland is required to radically reduce dependence on carbon-emitting fuels in the transport sector and that the strategy must promote, within its legislative remit, transport options which provide for unit reductions in carbon emissions. This can most effectively be done by promoting public transport, walking and cycling, and by actively seeking to reduce car use in circumstances where alternative options are available.

Section 7 states that *“the implementation of the Strategy will facilitate a more efficient use of land within the GDA. By focusing public transport investment, and investment in the cycling and pedestrian network, into the city centre, major suburban centres and hinterland growth towns, the Strategy will complement national, regional and local planning policy by promoting and enabling the consolidation of development into higher order centres... In terms of the provision of housing, the Strategy will directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.”*

The proposed development seeks to redevelop a brownfield site within walking distance of a QBC and also supported by local bus services, and as such it is considered an appropriate form and density of development in the context of supporting the vision and objectives of the *Transport Strategy for the Greater Dublin Area 2016-2035*.

7.1.3 Draft Greater Dublin Area Transport Strategy 2022- 2034

This draft strategy has been prepared by the National Transport Authority and was subject to public consultation up to January 2022. The Strategic Aim of this strategy is to provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports economic growth. The Strategy includes four Strategic Objectives to achieve this aim which are as follows:

- An enhanced natural and built environment;
- connected communities and better quality of life;
- a strong sustainable economy;
- and an inclusive transport system.

The proposed development is considered to be consistent with the objectives of the draft Transport Strategy as it will enhance the quality of the existing built environment in the neighbourhood of Crumlin, promote a better quality of life for existing and future residents by the regeneration of an underutilised brownfield site with a compatible use and support the use of existing public transport connections whilst also promoting sustainable modes of travel such as walking and cycling.

7.1.4 Bus Connects: Transforming City Bus Services 2018

Bus Connects Dublin project was published in 2018 which proposes a core bus corridor network. This will consist of sixteen radial core bus corridors, which will allow for quicker and more efficient journeys to and from the City Centre.

The Bus Connects programme will deliver a bus system that will enable more people to travel by bus, allowing bus commuting to become a much more viable and attractive option for the populace.

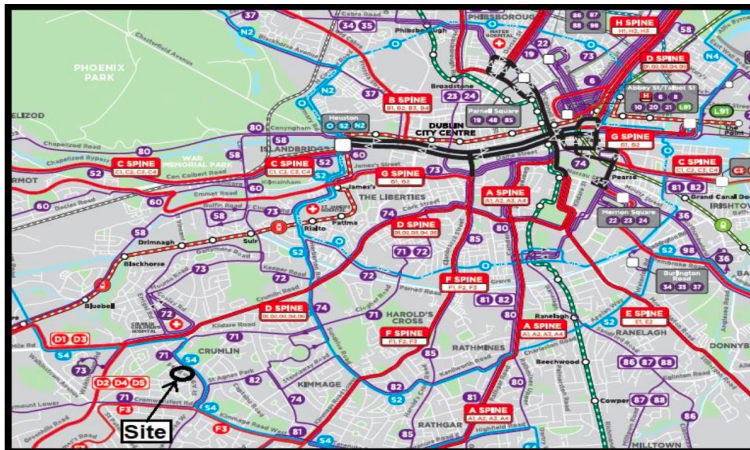
The site is located adjacent to one of the core radial corridors that Bus Connects is proposing into the city centre.

Bus Connects is expected to be implemented within a relatively short timeframe. This initiative will reconfigure the bus services for the Greater Dublin Area completely. This application as set out in the NRB report considers both the existing bus network and the planned Bus Connects Network.

7.1.5 Future Bus Services

In terms of **Future Planned Services**, the NTA have recently published details of the overall bus network for the GDA, the 'New Dublin Area Network' - showing Spine Routes, Feeder and Orbital Routes. An extract from the NTA Plans showing the site location is included.

This future network shows that the site's accessibility to bus services will be further enhanced, with a high frequency and permeable service to be provided. The site is located approximately 500m walk distance from the Main D Spine (Red Colour extract below) which is to run along Crumlin Road, north of the site. The planned frequency of service for the D Spine is a bus every 4 minutes.



Extract Current NTA Network Plans & Site

7.2 Regional Economic and Spatial Strategy 2019- 2031

The Regional Economic and Spatial Strategy (RSES), which was published in November 2018, notes that the preferred spatial strategy for the Eastern and Midlands is the consolidation of Dublin plus the Regional Growth Centres of Athlone, Dundalk and Drogheda, supported by planned focussed growth of a limited number of self-sustaining settlements.

The RSES sets out that the Dublin Metropolitan Area (DMA) includes “the continuous built-up city area and number of highly urbanised surrounding settlements”

Growth enablers for the Dublin Metropolitan Area include:

- To achieve growth of 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031;
- To realise ambitious compact development targets at least 50% of all new homes within or contiguous to the existing built-up area in Dublin and at least 30% in other metropolitan settlements;

Metropolitan Area Strategy

The Metropolitan Area Strategic Plan (MASP) supports the overall Settlement Strategy as set out in Chapter 5 and sets out an integrated land use and transportation strategy for the sequential development of the metropolitan area focussed on:

- Consolidation of Dublin city and suburbs
- Key Towns of Swords, Maynooth and Bray
- Planned development of strategic development areas in Donabate, Dunboyne, Leixlip, and Greystones

The following Regional Policy Objectives (RPO) are noted:

RPO 3.2: aims to promote compact urban growth - targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.

RPO 4.3: Supports the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

RPO 5.3 states that “Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.”

RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing: Design Standards for New Apartments’ Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.

RPO 5.5: Future residential development supporting the right housing and tenure mix within the DMA shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.

The RSES sets out 16 Regional Spatial Objectives which include: • Sustainable Settlement Patterns - Better manage the sustainable and compact growth of Dublin as a city of international scale and develop Athlone, Dundalk, Drogheda, and a number of key complementary growth settlements of sufficient scale to be drivers of regional growth. (NSO 1, 7, 10)

- Compact Growth and Urban Regeneration - Promote the regeneration of our cities, towns, and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region’s citizens. (NSO 1)

- Integrated Transport and Land Use - Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8,9)
- Support the Transition to Low Carbon and Clean Energy - Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050. (NSO 8, 9)

The proposed development will deliver a sustainable settlement pattern and provide for 150 no. residential units and a café and creche on a brownfield key site within the Local Centre of Crumlin, which will increase density, height and the consolidation of development at this location in a compact form. The proposal is therefore compliant with the over-arching objectives of the RSES, in this respect.

The future residents of the scheme will be able to utilise existing transport infrastructure ensuring the proper integration of transportation and land use planning. Crumlin has access to existing high capacity/frequency bus service; (as set out in the Bus Capacity Demand Report, prepared by NRB Consulting Engineers, included with the application for permission), located within walking distance of a QBC and will provide for a sustainable development as it will encourage the modal shift from the private motor car to more sustainable modes of travel.

The proposed development therefore enhances the activity and overall density in this urban area to provide for high-quality mixed-use development.

7.3 Consistency with Section 28 Guidelines

1. The key section 28 guidance documents of relevance to the proposed development are as follows:
 - Quality Housing for Sustainable Communities (2007)
 - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual;
 - Urban Development and Building Height Guidelines (December 2018);
 - Sustainable Urban Housing: Design Standards for New Apartments (2020);
 - Delivering Homes, Sustaining Communities (2008);
 - Design Manual for Urban Roads and Streets (2013);
 - Guidelines for Planning Authorities on Childcare Facilities (2001);
 - Draft Water Service Guidelines for Planning Authorities (2018);
 - The Planning System and Flood Risk Management (2009);
 - Appropriate Assessment of Plans and Projects – Guidance for Planning Authorities (2009);

7.3.1 Quality Housing for Sustainable Communities (2007)

Quality Housing for Sustainable Communities Best Practice Guidelines for Delivering Homes Sustaining Communities, (2007) is a guidance document the purpose of which is:

- promoting high standards in design and construction, and in the provision of residential amenity and services, in new housing schemes;
- encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;
- pointing the way to cost effective options for housing design that go beyond minimum codes and standards;
- promoting higher standards of environmental performance and durability in housing construction;
- seeking to ensure that residents of new housing schemes enjoy the benefits of first rate living conditions in a healthy, accessible and visually attractive environment;
- providing homes and communities that may be easily managed and maintained.

The guidelines set out good practice in relation to design and layout with a strong emphasis on urban design. We submit the proposed development, as further amplified in the Design Report prepared by Reddy A+U, accords with such good practice.

7.3.2 Sustainable Residential Development in Urban Areas (2009)

The *Sustainable Residential Development in Urban Areas* (2009) Planning Guidelines updated and revised earlier guidance of 1999. These statutory guidelines, which were brought forward to improve the quality of homes and neighbourhoods, set out best practice design criteria and provide a robust framework in which proposals for residential development should be considered. They establish a series of high level aims for successful and sustainable development in urban areas. The *Sustainable Residential Development in Urban Areas, 2009*, urges development of residential accommodation at higher densities, particularly near major public transportation corridors and on brownfield and infill sites in inner suburban areas.

The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

The Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 that ‘the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...’

Having regard to the Guidelines, the subject site is zoned for Residential Development. The proposed development will make efficient use of the subject land increasing residential development in an existing urban area and providing for high quality residential development in a key location well served by existing public transport and local services. The proposed development including the redevelopment of underutilised

brownfield lands and the re-use of a protected structure is therefore compliant with the guidelines in terms of the sequential development approach.

Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. The proposed development is located in close proximity to local services such as Crumlin Shopping Centre and other commercial properties as well as a key employer at Crumlin Hospital. In addition, the subject site is a short distance to the City Centre with a range of additional services available.

The subject lands are located close to 'Public Transport Corridors' in the context of the densities required under the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). The site is located within walking distance to a high capacity, high frequency QBC with multiple routes (as set out in the Transport and Bus Capacity Demand Report, prepared by NRB Consulting Engineers included with the application).

Section 5.8 of the Guidelines recommends that 'in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes. The proposed development provides for a gross density of 171 no. units per hectare (based on 0.88 hectares site area). It is considered that given the location of the site in close proximity to a number of surrounding services, including public transport links, existing local facilities and education and employment centres that the proposed density on the site is appropriate in this instance.

The layout is highly accessible for future occupants as well as the existing community with a permeable layout both internally and externally with a new pedestrian linkage provided during daylight hours to the surrounding residential area.

The proposed development has been designed to address the provisions of these guidelines, as set out hereunder:

- The lands proposed for development have been appropriately zoned and identified for development, in accordance with the priorities set out in the development plan.
- The location of the proposed development close to a series of Dublin Bus stops on St Agnes Road, which provide good quality public transport links. These stops are within 2/3 minute walk from the proposed 150 residential development site. Together with the site location within c.650m of a quality bus corridor(QBC), within 750m of Crumlin Hospital a major employer and within easy walking distance of Crumlin village, this proximity to bus routes will ensure good connectivity. Its location will promote walking and cycling to and from the site and minimise the use of cars.

- The design of the proposed development responds appropriately to its locational context, in terms of its density, scale, massing and architectural treatment and its distances from adjacent two storey houses
- It will provide an appropriate form and scale of development, generally in accordance with the Dublin City Development Plan, 2016-2022, and the Crumlin ACA (apart from building height policies and unit mix). The proposal provides for the refurbishment of Glebe House and the regeneration of a brownfield site in a sustainable manner.
- The Crumlin area is provided with a wide range of community and support facilities, including shops, healthcare and recreational and educational facilities.
- By its residential nature and its layout, with a greatly enhanced public realm, the proposed development will facilitate improved levels of interaction, when compared with the current situation on the site.
- The proposed development, by virtue of its location near good public transport facilities, on a brownfield site, by reason of its density and layout, will promote the efficient use of land and of energy, including in relation to transportation, and thereby have a positive impact on greenhouse gas emissions.
- The proposed development by virtue of its design, layout and massing, will provide a distinct sense of place.
- The replacement of prominently located vacant light industrial lands with a well-designed, high quality residential development, appropriately landscaped, will enhance the area and will not detract from the built environment. There will be no adverse impact on Protected Structures or on the Crumlin ACA.
- Sustainable drainage systems will be installed.

Having regard to the foregoing, the proposed development is consistent with the *Sustainable Residential Development in Urban Areas Planning Guidelines*.

7.3.3 Urban Design Manual – A best practice guide (2009)

The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

Prioritise walking, cycling and public transport, and minimise the need to use cars;

Are easy to access for all users and to find one's way around;

Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;

Provide a mix of land uses to minimise transport demand.

The proposed development accords with the guidance set out in the *Urban Design Manual*, as also addressed in the *Design Statement* by Reddy A+U. The Design Statement should be read in conjunction with this Statement of Consistency and Planning Report and with the plans and particulars accompanying this submission.

Urban Design Manual – 12 Criteria



Source: Urban Design Manual DoEHLG 2009

The *Urban Design Manual* sets out a series of 12 criteria, which should be used in the assessment of planning applications. We have set out below how the proposed development responds to these design criteria.

Context: How does the development respond to its surroundings?

The site is approximately 0.88 hectares in size and is located on the southern side of St. Agnes Road in the village of Crumlin. Glebe House fronts the street with the vacant light industrial workshops and hard standing directly to the rear. On the St Agnes Road frontage there is a terrace of redbrick two storey houses to the north west and to the north east a car park and parade of shops. On the Coruba site all previous buildings have been demolished. The site bounds Somerville Drive and Somerville Green to the east and west, which boundaries are presently defined by block walls. To the rear the site adjoins Moeran Community Hall and two areas of open space on either side fronting the adjoining roads.

The proposed development will provide a new urban form acting as a transition between the lower density of development to the rear of the site and the Local Centre of Crumlin. The higher elements of the buildings have been sized and articulated to provide an appropriate architectural response to this former light industrial site, but thereafter to step down in scale towards Glebe House and the other site boundaries with residential properties.

The proposed development is laid out to form a new streetscape, which acknowledges the established building lines of the existing houses along Somerville

Drive and Somerville Gardens. The proposed architectural treatment reinforces the street edge providing an active frontage, with a greatly enhanced public realm.

The architectural forms proposed provide a level of incident and detail, within a strongly coherent overall composition, which does not imitate, but responds in form and materials to existing buildings in the vicinity, including the Glebe Houses and other Protected Structures along St. Agnes Road.

Immediately south, east and west of the site, there are two storey, terraced and semi-detached houses that represent the expansion of the city to the suburbs. The introduction of higher buildings on this site, whilst representing a departure in terms of height and density, can be absorbed into the streetscape at this location.

The proposed development has been laid out and configured to accommodate to the scale of the residential properties in the vicinity and to protect their privacy. The layout and orientation of the site will ensure that the proposed development will not adversely affect daylight or sunlight penetration to these residential properties.

Somerville Drive is a cul de sac of two storey dwellings, on one side of the road facing the development site from which it is separated by a high wall. The proposed development includes the removal of this wall and setting back the new verge and open space. On the western side of the site, at Somerville Gardens, it is proposed to retain the existing boundary wall which separates the two sites. This provides a degree of privacy, at the lower levels, between the open space at Somerville Green and the proposed new residential units. The proposed development has been set back at its nearest corner to Somerville Green to provide an appropriate transition to those houses.

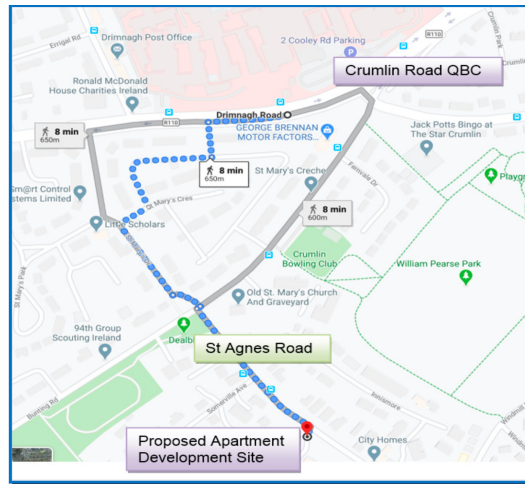
The proposed development, set back and to the side of Glebe House, ensures that the Protected Structure remains as the central focal point of the proposed development.

The development will be finished in materials of a high-quality design to ensure it represents its own character while at the same time integrate with the existing local character of Crumlin Village.

Connections: How well is the new neighbourhood / site connected?

The Glebe site is located within easy walking distance of bus stops on Saint Agnes Road and Crumlin Road QBC (3 min and 8 min). The village is well provided with local services and community facilities.

The proposed development will open up the site in terms of accessibility and connectivity between the existing Village Centre and the proposed new residential development.



Walking route to QBC

Inclusivity: How easily can people use and access the development?

The proposed development will be highly accessible in terms of transportation accessibility and will be designed in detail to facilitate access for persons with disabilities in accordance with Part M of the Building Regulations. A new controlled pedestrian path between the site and Somerville Drive will create a new public link to Crumlin village. This access will be controlled by a gate which will allow for pedestrian and cyclist connectivity during daylight hours through the site.

Variety: How does the development promote a good mix of activities?

The proposed development is to provide residential accommodation together with a café and a creche,

Efficiency: How does the development make appropriate use of resources, including land?

The site of the proposed development is appropriately zoned for residential use, is well located in an established urban area, is highly accessible and is currently entirely vacant. The proposed development would provide much needed residential accommodation at an appropriate density.

Distinctiveness: How do the proposals create a sense of place?

The architectural treatment, the layout and the scale proposed will create a strong sense of place.

Layout: How does the proposal create people-friendly streets and spaces?

The creation of a new streetscape with landscaped public realm, well overlooked from the new apartments, will replace the existing degraded environment when viewed from Saint Agnes Road, Somerville Drive and Somerville Green. The internal communal open spaces will be landscaped and accessible to residents. The formal open space in front of Glebe House and the public plaza between the proposed Café

and Creche and Somerville Drive will provide important civic spaces and a new controlled pedestrian route connecting the existing housing to the rear of the site with Crumlin village.

Public realm: How safe, secure and enjoyable are the public areas?

As above.

Adaptability: How will the buildings cope with change?

The development will provide a range of accommodation sizes and layouts to meet the needs of a variety of life- styles. In relation to the proposed residential units, all of the dwellings meet or exceed the minimum standards for residential unit size. The development provides a mix of 1-, 2-, and 3-bedroom units that can be easily reconfigured to adapt to the changing life cycles and personal needs of each resident. The proposed development also provides for communal space at podium and ground floor level which can be adapted for a number of different uses

Privacy / amenity: How do the buildings provide a high-quality amenity?

The architectural treatment has been strongly influenced by the need to protect the privacy and amenity of existing property in the environs. The creation of a new streetscape with landscaped public realm, well overlooked from the new apartments, will greatly enhance the quality of the public realm along Somerville Drive, Somerville Green and St. Agnes Road. The internal amenity space at podium level in the development will be highly landscaped in accordance with the detailed design by Áit. The formal garden in front of Glebe house will provide an appropriate setting for the house together with an important civic space in Crumlin.

The design of the apartments have also had due regard to the siting and orientation of the development in order to maximise the solar gain and natural light aspect of each dwelling. The development provides for adequate separate distances between units within the scheme. This maintains a high level of privacy and amenity obtained by residents and reduces the level of overlooking and overshadowing.

A daylight analysis has been prepared by IES and the report confirms that:

“Across the proposed development, 95% of the tested rooms are achieving Average Daylight Factors (ADF) in accordance with the BRE Guide / BS 8206-2:2008 when Living/Kitchen/Dining spaces are assessed as whole rooms against a 2% ADF target and Bedrooms against a 1% ADF target. The majority of rooms that are below the recommendations are located on the lower floors. However, overall the quality of daylight provision across the development can be considered high. On March 21st, 57% of the proposed amenity space situated within the apartments area of the development will receive at least 2 hours of sunlight over the total area provided, thus exceeding the 50% recommendation noted in the BRE Guide”.

As such, it is considered that the level of residential amenity obtained within the proposed development is therefore consistent with the relevant guidelines.

Parking: How will the parking be secure and attractive?

Car parking is proposed between Block A and B at ground floor level below a garden podium in a secure, well laid out facility. Five additional designated car parking are provided on Somerville Drive together with four spaces at the front of Glebe House for visitors. Cycle Parking for residents is in secure areas beneath the podium. Visitor surface level cycle parking spaces has been integrated into the landscape proposal so as to ensure an attractive and integrated approach is implemented. These visitor cycle spaces are not included within the 10% provision of public open space in front of Glebe House.

Detailed design: How well thought through is the building and landscape design?

The proposed design of the development has been subject to a preapplication consultation between the design team and the Planning Authority. All members of the design team, led by Reddy A+U, are very well experienced in their respective professions. Great care and attention to detail has characterised the design process and the result is a proposed development of particularly high quality. The Architectural Design Statement sets out a comprehensive design rationale for the proposed development. The proposed design rationale has been carefully considered and has evolved based on the pre-app consultation with Dublin City Council and the Opinion issued by An Bord Pleanála. It is considered that the proposed scheme makes best use of its location on a vacant brown field site and makes appropriate response to the site characteristics and the residential zoning of the site.

The landscape strategy aims to integrate the new built development with the existing streetscape character and create a high-quality development incorporating a public plaza and quality public open space in front of Glebe House.

As described above and as set out in detail in Reddy A+U Design statement, the proposed development complies with the provisions of the *Urban Design Manual*.

7.3.4 Sustainable Urban Housing: Design Standards for New Apartments (2020)

The *Sustainable Urban Housing: Design Standards for New Apartments, 2020*, modify earlier guidance in documents of the same title from 2015 and 2018. The amended guidelines of 2020 prohibit the shared accommodation model, but otherwise retain most elements of the 2018 Guidelines, including those which are relevant to the proposed development at the Glebe House. The Guidelines address particular issues in order to:

- Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;
- Make better provision for building refurbishment and small-scale urban infill schemes;
- Address the ‘build to rent’ sector;
- Prohibit ‘shared accommodation’ models since 2020;
- Remove requirements for car-parking in certain circumstances where there are better mobility solutions.

The guidelines identify three main types of urban location for which particular considerations are set out in respect of residential development. The second and third of these concern intermediate urban locations and peripheral, less accessible urban locations, respectively. The first urban typology described in the Guidelines is that of *Central and/or Accessible Urban Locations*.

These are stated in the Guidelines to be suitable for small to large-scale and higher density development, depending on location, that may wholly comprise apartments. They include sites:

- (i) 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;
- (ii) within reasonable walking distance (800m-1000m) of high capacity urban public transport stops (such as DART or Luas)
- (iii) sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.

The site clearly falls into the category of a *Central and/or Accessible Urban Location*. It is within Crumlin Village, which contains neighbourhood shopping, pubs and community and healthcare facilities and a shopping centre. The site is approximately 750m from Crumlin Hospital a major employer. The proposed development site is located close to a series of Dublin Bus stops on St Agnes Road which provide good quality public transport links. These stops are within 2 to 3 minute walk from the proposed development site. In addition there are a number of other Dublin Bus Stops operating locally, particularly on Kimmage Road West adjacent the site and the Crumlin Road Quality Bus Corridor (QBC) which is an 8 minute walk to the north of the proposed site.

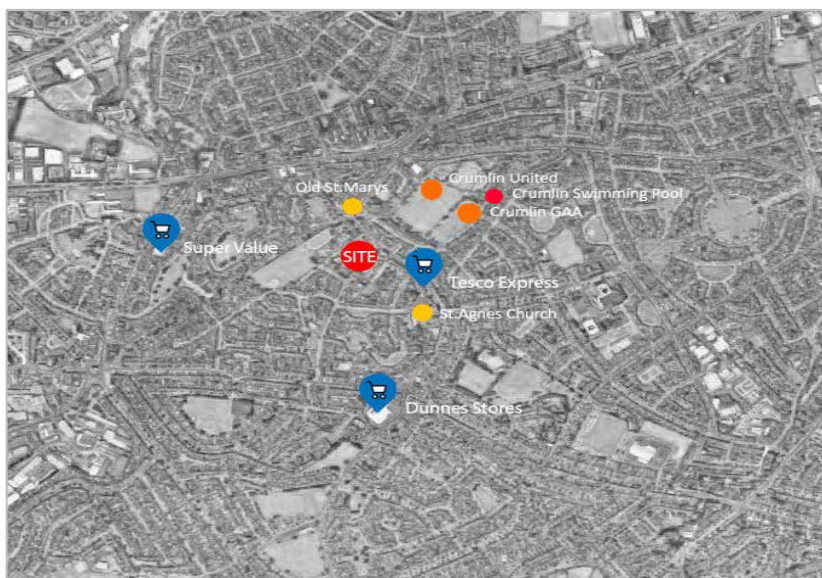
We refer the Board to the Transport Assessment Report which includes a Bus Capacity Demand Report prepared by NRB Consulting which sets out the transport options and availability for the residents of the scheme.

The Guidelines note that in Central and/or Accessible Urban Locations planning authorities must consider a reduced overall car parking standard “In more central locations that are well served by public transport, the default policy is for car parking

to be minimised, substantially reduced or wholly eliminated in certain circumstances.”

The proposed development in this regard will provide for 75 no. car parking spaces which results in a ratio of 0.5 spaces per unit. The proposed ratio of car parking is consistent with the approach under the Apartment Guidelines

In principle, higher density residential development can be supported on the site.



Services in the general area

Details in respect of compliance with the standards contained in the *Sustainable Urban Housing: Design Standards for New Apartments, 2020*, are set out in the accompanying *Housing Quality Assessment and Schedule of Accommodation* by Reddy A+U.

In particular, the guidelines contain a number of *Specific Planning Policy Requirements (SPPR)* of relevance.

SPPR 1:

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)

A total of 150 apartments is proposed, of which 74 are one bedroom or 49% of the total. There are 72 two bedroom units or 48 % of the total and 4 three bedroom units or 3% of the total and there are no studio apartments.

SPPR 2: Not relevant

SPPR 3:

Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sqm
- 1-bedroom apartment (2 persons) 45 sqm
- 2-bedroom apartment (4 persons) 73 sqm
- 3-bedroom apartment (5 persons) 90 sqm

The development complies with this requirement as set out in the *Schedule of Accommodation* and Housing Quality Assessment. Also, in this regard, the guidelines state that planning authorities may consider a two-bedroom apartment to accommodate 3 persons, with a minimum floor area of 63 square metres, but only up to 10% of the total. There are different Apartment typologies and sizes proposed to reflect the anticipated different tenures within the development.

There is a further related requirement in respect of minimum floor areas set out in the *Sustainable Urban Housing: Design Standards for New Apartments, 2020*, whereby the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10%.

This requirement is complied with as shown on the *Housing Quality Assessment* which indicates that 69% of the units are 10% or greater.

SPPR 4:

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

The proposed development of 150 apartments includes 59% of the proposed units as dual aspect units. Single aspect units have been located facing west, east, or south. The proposed dual aspect ratio therefore, accords with SPPR4 with more than 50% dual aspect units. We refer to the details set out in the Design Report from Reddy A+U in relation to the provision of dual aspect units.

SPPR 5:

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

The proposed development has been designed to a high standard. Floor to ceiling heights comply with the standard set at SPPR 5.

SPPR 6:

A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , subject to overall design quality and compliance with building regulations.

The proposed development complies with the requirement of maximum 12 units per core.

Storage:

The proposed development complies with the requirements set down in respect of storage at Appendix I of the guidelines.

Private Amenity Open Space:

The proposed development complies with the requirements set down in respect of private amenity open space in the guidelines. All of the units are provided with private open space comfortably in excess of the minimum, as shown in the *Housing Quality Assessment*.

Communal and Public Open Space:

The *Sustainable Urban Housing: Design Standards for New Apartments, 2020*, set out standards for open space, at Appendix I.

Proposed communal open space areas of circa 1,600 sqm and circa 905 sqm of public open space are proposed. The scheme has a clear definition of public, communal and private spaces (balconies). Public spaces are accessed from the public pavement along Saint Agnes Road and through a controlled pedestrian/ cycle gate at Somerville Drive. Visitor cycle parking is located adjacent to the public open space areas. Children's play facilities are provided in the communal garden at podium level between Blocks A and B for residents.

Children's Play:

The guidelines state that '*Children's play needs around the apartment building should be catered for:*

- *within the private open space associated with individual apartments;*

- within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and
- within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.

The proposed development provides 72 no. 2 beds and 4 no. 3 beds and therefore the proposed development, which provides a play space area of circa 100sq.m, is appropriately designed. The children's play area as proposed is in line with the Apartment Guidelines for a residential scheme of this size. This is provided within the main communal open space at podium level. Please refer to Áit landscape proposals for further details in relation to the play space proposed.

Security:

The proposed development complies with the requirements set down in respect of security and surveillance in the guidelines.

Refuse Storage:

Ample provision is made for storage of refuse in the proposed development, at ground floor level, as shown on the drawings prepared by Reddy A+U. We refer the Board to the Operational Waste Management Plan prepared by AWN Consulting, which illustrates that the proposed bin storage is sufficient to cater for the needs of proposed residents.

Bicycle Parking:

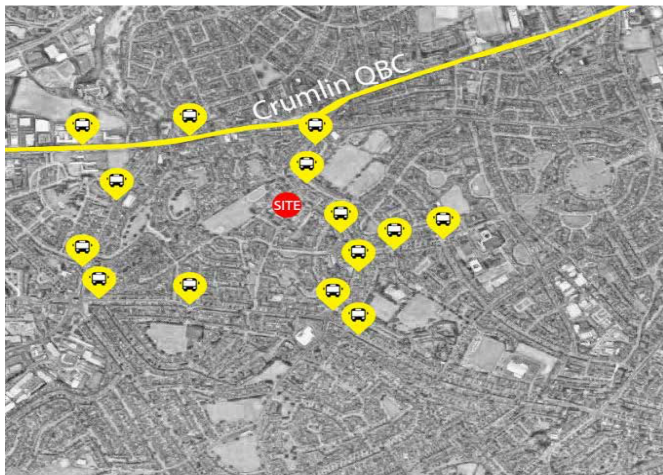
230 resident cycle parking spaces are provided, in a secure location below podium within the carpark, which accords with the requirement set down in the *Sustainable Urban Housing: Design Standards for New Apartments, 2020*. A further 76 spaces are provided for visitors within the public accessible areas of the site.

Car Parking:

In higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the guidance document *Sustainable Urban Housing: Design Standards for New Apartments, 2020*, advocates a default policy for car-parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances, in highly accessible areas. In the current instance, a provision of 75 car spaces (0.5 spaces per apartment) is proposed. The proposed ratio of car parking is consistent with the approach under the Apartment Guidelines.

This provision is justified by the proximity of the proposed residential development to high quality public transport (QBC). This SHD application is accompanied by a *Transportation Assessment Report* (including a Preliminary Travel Plan, DMURS Statement of Consistency an Independent Stage 1 Road Safety audit and a Bus

Capacity Demand Report) prepared by NRB Transportation consultants. As set out



above, the proposed development complies with the provisions of the Sustainable Urban Housing Standards.

Bus stops in the general area

7.3.5 Urban Development and Building Heights: Guidelines for Planning Authorities, 2018.

The Urban Development and Building Height Guidelines are intended to set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040. Compliance with these requirements and, in particular with the requirements of SPPR 3(A) have been addressed in the Material Contravention Statement, accompanying the planning application.

The guidelines in effect put in place a presumption in favour of increased building height at public transport nodes. The guidelines state that it is Government policy to promote increased building height in locations with high quality public transport services.

The Guidelines emphasise the policies of the NPF to greatly increase levels of residential development in urban centres and significantly increase building heights and overall density and to ensure that the transition towards increased heights and densities are not only facilitated but actively sought out and brought forward by the planning process and particularly at Local Authority level and An Bord Pleanála level.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Authorities and An Bord Pleanála will be required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their function.

The statutory plan in this respect is the Dublin City Development Plan 2016- 2022 which refers to the site as being located in the outer city. The Plan states that a 16m height is appropriate for such inner suburban city locations. The proposed development contravenes the height by proposing a 20.1m parapet height above a section of Block A and the remainder of Block A and Block B at 17m marginally contravenes the 16m requirement as set out. Notwithstanding this, An Bord Pleanála may still grant planning permission for the proposed development pursuant to section 9(6)(c) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended.

It is submitted that the justification set out within the accompanying Material Contravention Statement clearly demonstrates that the proposed development should be considered for increased building heights due to the location of the subject site close to a quality public transport corridor and the policies and objectives set out within the Section 28 Guidelines in particular the Urban Development and Building Height Guidelines, and the National Planning Framework.

In particular, SPPR 3(A) of the Urban Development and Building Height Guidelines provides a justification for a material contravention of the Development Plan in relation to building height having regard to the compliance of the proposed development with the criteria under Section 3.2 of the Guidelines. In addition, the proposed level of car parking proposed is consistent with the policies and objectives set out within the Section 28 Guidelines, in particular the Sustainable Urban Housing: Design standards for New Apartments 2020.

The Glebe / Coruba site is zoned for residential development and has been clearly identified for such development. The site is a substantial area of disused brownfield land, well connected to high capacity and frequency public transport and within easy walking distance of all the facilities in Crumlin. It is an appropriate location for buildings of increased height and density. The proposal is for buildings of up to a maximum height of six floors.

Development Management Criteria

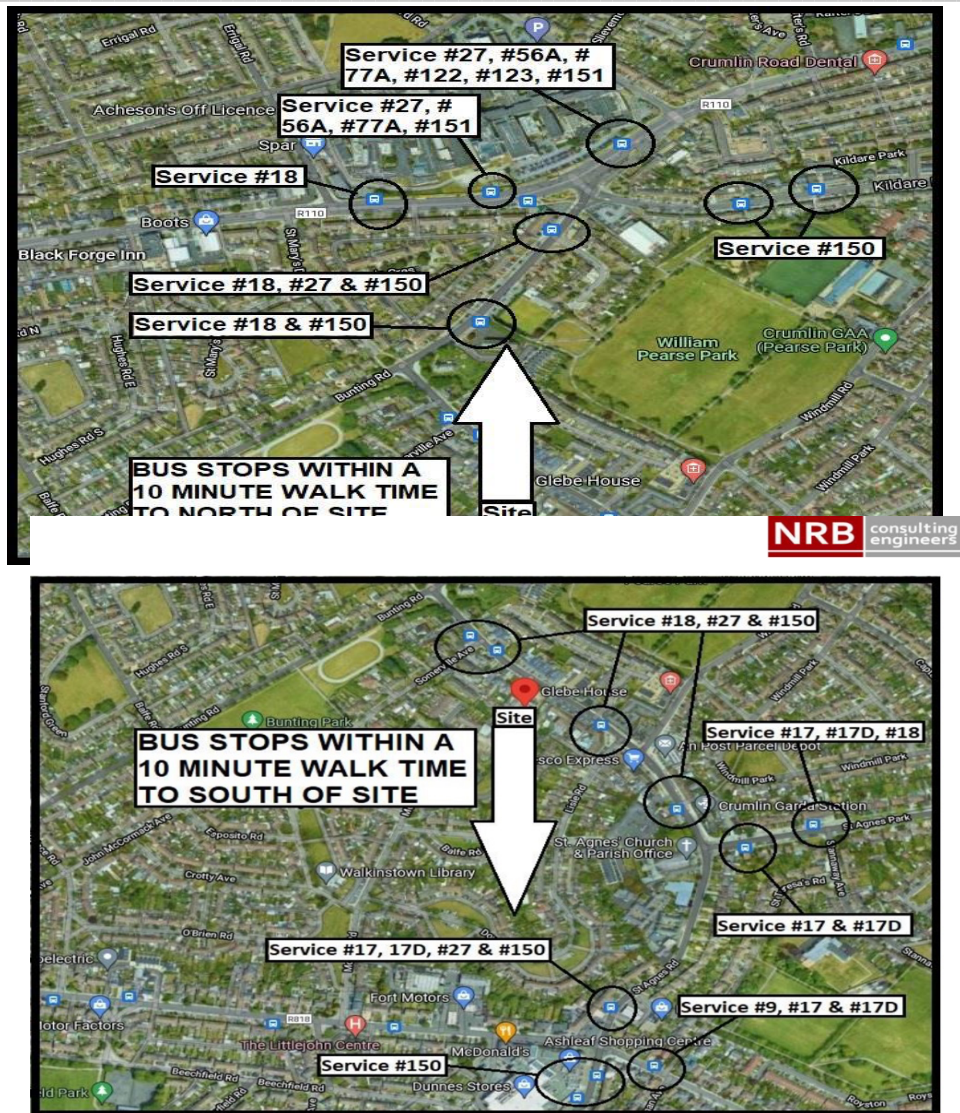
The *Building Heights Guidelines* state that, in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority or An Bord Pleanála, that the proposed development satisfies the criteria referred to above and which are set out in Section 3.2 of the said guidelines as follows:

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.*

The site is well located in Crumlin Village close to bus stops, where Dublin Bus operates several multi-directional bus routes serving stops within a 3 minute and 8 minute walk of the site along Saint Agnes Road, Kimmage Road West and Crumlin Road.

The site is very well served by Bus Services, and this is illustrated in the Bus Capacity Report prepared by NRB as set out below within **Figure 2.1** and **Figure 2.2** which illustrate the existing bus services within a 10 minute walking distance of the site. The existing Bus Stops and Services to the north and south of the site are illustrated below as (correct at time of writing).



There is also existing cycle lane infrastructure on the surrounding road network. In short, this is a location meeting the criteria for “central and/or accessible locations” referred to in paragraph 2.12 of the *Building Heights Guidelines*.

- *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 Design Statement, by Reddy A+U, sets out the architects’ design philosophy in relation to integrating the proposed development into this area of Crumlin, including with respect to the Protected Structures in the environs and the Crumlin ACA which includes part of the site on Saint Agnes Road. In relation to the ACA, its special interest is unaffected, for the following reasons:

- The existing view from the southeast shows a forlorn Glebe House detached and removed from the public realm along St Agnes' Road defined by its low quality ground surfacing and absence of landscaping. The space around Glebe House and the relationship of the house to adjacent structures is ambiguous and ill-defined.
- The new proposal, with contemporary pavilion buildings either side of the house, seeks to resolve this ambiguity, establishing connections back to the public realm by extending the formal symmetry of the 18th century structure. Behind this formal presentation to the street rise the new apartments, which mitigate their impact on the historic structure by dropping down to four storeys.
- The existing granite boundary wall is retained with a formal lawn set behind this wall, thereby preserving the amenity and setting of the house.
- The form and materials of the proposed pavilion buildings will complement the lime render on Glebe House.
- A landscape and visual assessment has been carried out by Ait Urbanism and Landscape with verified views provided by James Horan illustrating the relevant points.

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

The proposal frames Glebe House with two pavilion buildings, behind which the main apartment buildings rise, respectively, to four floors to the rear of Glebe House and six floors at the rear of the site. The proposed development forms a new streetscape onto Somerville Drive, including own door access at ground level, replacing a vacant brownfield site. The proposal avoids any monolithic appearance by stepping the buildings down to the front and beside site boundaries and addresses the adjoining streets to the rear. The stepped levels graduating from Glebe House to Somerville Drive and Somerville Green respond to the site context, avoiding any adverse visual impact on the surrounding area and in particular the ACA. The building typologies give a contextual and architectural solution to the provision of increased densities on the site.

- *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 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.*

The proposed development responds to its natural and built environment, including its cultural context through a number of key design features. The refurbishment of the Protected Structure and its setting within a formal landscaped garden will improve the setting of the house whilst the provision of a commercial use at ground floor level in one of the pavilion buildings, in the form of a café, will invite visitors and residents through the site. The development will enhance the vitality and vibrancy of the locality and make a positive contribution to this urban neighbourhood. As noted above, the development entails creating a new urban form for this brownfield site and gives Glebe House an appropriate setting in its urban context. This is in lieu of an unsightly light industrial complex of buildings at a key location on one of the main access roads into Crumlin. The proposed development will provide a strong sense of enclosure and sense of scale.



The circulation routes through the site will link the public open spaces and invite residents and visitors into the site from the site entrances. This will significantly improve the permeability of the site, opening it up to the public and increasing connectivity with the wider urban area in an integrated, cohesive manner. The proposed built forms help aid legibility on the surrounding streets and provide connectivity to the village.

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

The housing offer in Crumlin is made up of predominantly detached, semi-detached and terraced houses. There is relatively limited apartment accommodation available.

The apartment buildings now proposed allow for a greater variety of unit types, offering more choice and options within Crumlin village and surrounding suburb.

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 buildings have evolved to allow light penetration between them, avoiding north facing single aspect apartments. Detailed shadow diagrams are included in the attached report on *Sunlight, Daylight and Shadow Analysis* prepared by IES Consulting. The IES report assesses the sunlight on the open spaces and adjacent residential properties as a result of the proposed massing. It concludes that overshadowing and loss of light to adjoining dwellings, including private amenity space, will be minor and well within the guidelines set out in the BRE publication *Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*.

- *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 has been designed to ensure good quality daylight to the residential units. The proposed scheme is consistent with both the Building Research Establishment's *Site Layout Planning for Daylight and Sunlight* and BS 8206-2: 2008 – *Lighting for Buildings – Part 2: Code of Practice for Daylighting* as outlined in IES *Sunlight Daylight Analysis Report*.

"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 to an effective urban design and streetscape solution".

The reduction in ADF in some units (5%) is typically expected on urban site that provide for high density. In addition, due to the layout of the development and the need to address a number of key frontages, some rooms may be orientated in a less favourable direction to achieve the appropriate BRE recommendations. In this regard a balance must be struck between the overall site layout and response to the street scape and the minor reduction in VSC of some of the proposed some units may achieve. We refer to the detailed report prepared by IES which also sets out compensatory measures on this site.

7.3.5.1 Specific assessment as set out in the Guidelines also include the following:

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

The proposed development is not considered a tall building so as to fall under the category that may give rise to any significant concerns in terms of microclimatic effects. A wind assessment has been prepared to demonstrate the appropriateness of the proposed height and massing within the development.

The wind study states that the proposed development is likely to provide a suitable environment for pedestrians and its occupants.

2. ***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 line and / or collision.***

An Ecological Impact Assessment has been carried out by Openfield Ecology and is submitted as part of this application. The report notes that the site is not a bird or bat sensitive site and there will be no impact in this regard.

In addition, two bat surveys has been carried out on the site in July 2020 and September 2021 and the Bat reports identify that there is very little bat activity on the site, with only one species recorded- a Leisler's bat in 2020 with no evidence of roosting bats identified.

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

An assessment of the potential impact of the development has been carried out by ISMIreland. The report concludes that *telecommunication channels will be impacted by the increased height of the proposed development. Compensatory measures in the form of Microwave Dishes have been included with the SHD application to mitigate these impacts.*

4. ***An assessment that the proposed development maintains safe air navigation;***

The proposed development rising to part 6 storeys in Block A is not considered to affect air safety navigation.

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

A detailed Heritage Impact Assessment report Architects has been prepared by Mullarkey Pedersen Conservation Architects and the conclusion advises that the site can accommodate the development as now proposed.

An urban design statement has been prepared by Reddy U+A which sets out the proposed development in urban design terms. A series of verified views have also been prepared by James Horan which indicate the impact of the proposed development on the surrounding built environment and urban landscape.

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

An AA screening report has been prepared by Openfield Ecology and is submitted with this application. The report provides information to enable the Board to consider whether an AA is required. The report concludes that the basis of the screening exercise carried out, it can be concluded that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.

The proposed development is below any relevant threshold for EIA. An Environmental Screening Report has been submitted as part of the application which provides the necessary information to enable the Board to carry out a screening assessment for the purposes of determining whether an EIA is required. The authors of the Environmental Report (AWN), taking into account all expert reports submitted with the application, conclude that, in their opinion, an EIAR is not required.

7.3.5.2 Conclusion

Having regard to the assessment of the proposed development under the criteria contained in Section 3.2 in accordance with SPPR3, as set out above, it is considered that the proposed development is compliant with the relevant standards and the proposed height of 3 no. to 6 no. storeys is permissible.

In the event that the Board decided to grant permission for the proposed development, notwithstanding the height provisions of the development plan, it would be appropriate that the Board would refer to the Building Height Guidelines and SPPR 3(A) in particular, in its reasons and considerations, as a justification for granting permission. It is respectfully submitted that there is a very clear planning policy framework as set out above in the National Planning Framework and the general policies and objectives of the Urban Development and Building Height guidelines, which provide a very clear basis and rationale for granting permission for the proposed development, in accordance with the objectives of SPPR3.

The Dublin City Development Plan height policies do not align with the NPF as set out in 3.1 of the Guidelines where there is a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.

The proposed development at 3-6 no. storeys provides for the appropriate scale and density for residential development in existing urban areas and adjacent to high quality public transport corridor.

Precedent for Increased Height

We note that under SHD legislation, permission for the proposed development may be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan. We have reviewed recent decisions issued by the Board, where permission was granted for building heights that, prior to the publication of the *Building Heights Guidelines*, would have been considered contrary to the local planning policy framework in respect to building heights. The 200 Act states at S37 (2) (B) (iv) “ permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan”. While “area” is not defined we have concentrated our examination of relevant cases within a c.2.5km radius of the proposed development site.

The following are SHD permissions granted within a radius of c. 2.5 km the Glebe site.

ABP-303435-19 (c. 2km distance from Glebe)

Durkan (Davitt Road) Ltd.

Former Dulux Factory Site, Davitt Road, Dublin 12, D12 C97T, proximately 0.8266ha.

The development will consist of 265 'Build-To-Rent' apartments in 4 no. 3-7 storey blocks with a basement level. ABP Decision 17/04/2019

ABP-304686-19 (c.2km distance from Glebe)

Jackie Greene Construction Limited

Lands immediately east of the Assumption National School, Long Mile Road, Walkinstown, Dublin 12, consisting of 153 residential units on a site measuring 0.938ha. ranging in height from three to six storeys. ABP Decision 18/07/2019

ABP-305061-19 (c.2.6 km distance from Glebe)

Molaga Capital Limited

Former Rialto Cinema, 355, South Circular Road, Dublin 8, consisting of the demolition of all buildings and structures on site with the exception of the front Art Deco section of the building, which will be retained, restored to its original form, and incorporated into the proposed development and the construction of a mixed-use building ranging in height from three to seven storeys over basement comprising a student accommodation scheme of 317 no. student beds. ABP Decision 15/11/19

ABP-311606-21. (c.2km distance from Glebe) lands at Carriglea Industrial Estate, Muirfield Drive, Naas Road, Dublin 12, permission for the construction of a residential development of 249 no. apartments in five to eight storey blocks. ABP Decision 3rd Feb 2022.

7.3.4.3 Conclusion in Relation to Building Heights

We submit that the proposed scheme meets the criteria set out under Section 3.2 of the *Urban Development and Building Heights Guidelines for Planning Authorities, 2018*, as set out above. In accordance with the provisions of SPPR3, the Board can grant permission for the proposed, notwithstanding any conflict with the building height provisions of the Dublin City Development Plan, 2016-2022, and the Crumlin ACA.

Having regard to the Dublin City Development Plan policies on heights for the subject site, which allow heights of up to 16m, it is respectfully submitted that An Bord Pleanála can grant permission having regard to Section 3 of the *Building Height Guidelines*, as set out in the *Material Contravention Statement*, submitted in support of this SHD application.

Section 3 of the *Building Height Guidelines, 2018*, outlines that it is Government policy to increase building heights in appropriate urban locations. Having regard to the location of the subject site within Crumlin and its proximity to good public transport facilities, it is considered that the development meets the relevant development management criteria for increased building height and, therefore, the Board can approve such development, even though the specific objectives of the Development Plan indicate otherwise.

Whilst the transition in scale from two storey properties in the vicinity is acknowledged, in planning policy terms increased height is supported by the *National Planning Framework*, the *Apartment Guidelines 2020* and the *Building Height Guidelines 2018*, in order to create more compact growth on brownfield sites and close to public transport corridors. Furthermore, the development has been carefully designed to ensure the residential amenities of adjoining properties are respected.

The proposed heights and massing have been informed by a Daylight / Sunlight assessment prepared by IES Consulting, which indicates that the proposed setbacks to the residential properties are sufficient to avoid any significant adverse impacts in terms of loss of daylight and sunlight.

The separation distances from the properties are considered sufficient to avoid issues of overlooking and overbearing and result in an appropriate development on the site which is zoned for residential development.

The proposed heights are considered to be appropriate for the following reasons, having regard to the criteria required under SPPR 3 of the Building Height Guidelines:

- The site is located in Crumlin within the Dublin Metropolitan Area in the administrative boundary of Dublin City Council, which is well served by public bus services into the city centre and a number of services, amenities and employment in the area. There is a presumption of increased height in town/city cores and in other urban locations with good public transport accessibility and therefore the proposed heights in this context are considered appropriate.

- These brownfield lands occupy a prominent location within Crumlin. The proposal responds to the built environment and makes a positive contribution to the residential neighbourhood. The design, which is informed by Glebe House, a protected structure to the front of the site, utilises the location of the site in the village to create greater permeability and to improve and consolidate the built form and public realm at this location.
- The public realm improvements will enhance the area and provide an attractive public amenity space in front of Glebe House.
- The development provides for a suitable and sustainable utilisation of this brownfield land and the proposed development has been carefully designed to maximise access to natural daylight, ventilation and views and to minimise overshadowing and loss of light to adjoining residential properties.

Having regard to the above, the proposed development provides for an appropriate scale of development on this prominent site in Crumlin village. It is further submitted that the proposed height and scale of the development accords with good urban design principles and provides for quality street frontages to adjoining roads, creating a sense of place and providing an appropriate design response to the surrounding residential properties.

The proposed scheme meets the criteria set out under Section 3 of the Urban Development and Building Heights Guidelines for Planning Authorities, 2018, as set out above. In accordance with the provisions of SPPR3, the Board can grant permission for the proposal, notwithstanding any conflict with the building height provisions of the Dublin City Development Plan.

7.3.6 Planning Guidelines for Childcare Facilities (2001)

The *Planning Guidelines for Childcare Facilities (2001)* require provision of a childcare facility for every 75 dwelling units.

However, the *Sustainable Urban Housing: Design Standards for New Apartments, 2020*, (Section 4.7) state that notwithstanding these requirements, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and, subject to location, this may also apply in part or in whole to units with two or more bedrooms.

The proposed total of two bedroom units is 72 and of three bedroom units is 4. According to the *Sustainable Urban Housing: Design Standards for New Apartments*,

2020, only the two and three bedroom units contribute to childcare requirements and these fall just above the 75 unit threshold cited in the *Planning Guidelines for Childcare Facilities*.

In the particular instance it is considered that provision of a childcare facility is appropriate having regard to the fact that the threshold is 75 units and number of two bed and three bed apartments is 76 units. The proposed development would therefore result in a potential requirement of 20 no. childcare spaces (based on 76 no. units).

A creche is proposed located at ground floor level in Block B, along the new public plaza and will be accessed directly off-the public plaza. The creche will be approx. 147 sq.m. with the ability to cater for c. 25 no. children based on c.4.5 sq.m. gross per child which is in excess of the Guidelines. The creche also includes an outdoor play space to the side of the facility which will be a secure play space for the children with appropriate fencing and landscaping.

The creche will serve the new residential community and the surrounding neighbourhood. Parents from the nearby residential areas will be encouraged to walk of cycle to the facility. Additionally the four visitor car parking spaces to the front of Glebe House will facilitate some drop off and collection from the Creche. There will be no drop off car parking along Somerville Drive and parents using the creche will be advised of this on enrolment of their children at the creche.

7.3.7 Draft Water Services Guidelines for Planning Authorities 2018

The Draft Water Services Guidelines for Planning Authorities were published in January 2018 by the DoHPLG, which sets out a clear structure for actively managing the interface between spatial planning and development and water services planning. The Water Services Guidelines for Planning Authorities have been prepared by the Department of Housing, Planning and Local Government in consultation with Irish Water.

The Guidelines provide best practice guidance in relation to the interface between planning and development functions provided by planning authorities and the delivery of public water services by Irish Water.

The key aims of the Guidelines are to:

- *Provide advice to planning authorities on the operational framework within which Irish Water must operate to deliver water services,*
- *Establish mechanisms for effective engagement between planning authorities and Irish Water across all the relevant functions of planning authorities, and*
- *Set out how the planning system, in setting out a spatial framework for growth and development, will relate to and inform the planning and delivery of water services by Irish Water at a national, regional and local level.*

The Draft Guidelines state that it is a requirement for Strategic Housing Development applications to contain evidence that Irish Water has confirmed that it is feasible to provide the appropriate service or services and that the relevant water network or networks have the capacity to service the development.

The Draft Guidelines outline that having regard to the views of Irish Water and having satisfied itself *“that there is a reasonable prospect of the constraint(s) being addressed within the lifetime of the permission, a planning authority or An Bord Pleanála (in the case of a SHD application) may approve, inter alia, this aspect of the development, subject to a condition that requires the applicant to enter into a connection agreement (s) with Irish Water to provide for a service connection to the public water supply and / or wastewater collection networks, as appropriate.”*

Irish Water have confirmed that (i) there is capacity in the networks and (ii) that it is feasible to provide the services, a Confirmation of Feasibility and Confirmation of Design acceptance is included with the SHD application. The confirmation of Design acceptance states that Irish Water “have reviewed your proposal for the connection(s) at the Development. Based on the information provided, which included the documents outlined in Appendix A to this letter, Irish Water has no objection to your proposal.”

7.3.8 Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009)

Under Article 6 (3) of the EU Habitat Directive any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 – 2010).

An Appropriate Assessment Screening Report prepared by Openfield Ecology is submitted with this application.

The purpose of this Screening Report is to facilitate a screening assessment by the Board of the proposed development to enable it to determine whether or not a Natura Impact Statement, is not required.

On the basis of the screening exercise carried out, it can be concluded that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.

7.3.9 The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)

The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and

mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

A site specific flood risk assessment has been carried out by CORA Consulting Engineers in relation to the proposed development. The site is located within flood zone c which is appropriate for residential development, accordingly, the proposed development is in compliance with the provisions of the Flood Risk Guidelines.

7.3.10 National Adaptation Framework: Planning for a Climate Resilient Ireland (2018)

The non-statutory *National Climate Change Adaptation Framework - Building Resilience to Climate Change (NCCAF)* is a high level Government policy document dating from 2012. The NCCAF was the first step in developing a national policy in Ireland to address the anticipated impacts of climate change through a structured programme of action on adaptation across different sectors and levels of government. The NCCAF identified Government Departments responsible for producing adaptation plans for 12 key sectors.

The subsequent statutory *National Adaptation Framework* of 2018 specifies the national strategy for the application of adaptation measures in different sectors and by local authorities, in their administrative areas, in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This NAF and its successors will therefore set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are integrated into all local, regional and national policy making.

The proposed development has been designed to be resilient in relation to climate change and efficient energy use (see *Energy Statement* by Dynamic Design Consulting) and accords with the said guidelines.

7.3.11 Design Manual for Urban Roads and Streets (DMURS)

NRB Consulting Engineers, specialist transportation engineers, have assessed the proposed development in relation to the *Design Manual for Urban Roads and Streets* (DMURS). They have concluded that the proposed development is consistent with both the principles and guidance outlined within the *Design Manual for Urban Roads and Streets* (DMURS) 2013, as amended in 2019. The scheme proposals are the outcome of an integrated design approach. This approach seeks to implement a sustainable community connected by well-designed links, layout and access, which combined will deliver an attractive, convenient and safe development in addition to promoting modal shift and viable alternatives to car based journeys.

DMURS sets out four core design principles which designers must have regard for the design of roads and streets.

With reference to Design Principle no. 1 (connected networks), the proposed development does not create any new roads or streets but focuses on connectivity

through and within the site for pedestrians and cyclists. The provision of high levels of connectivity for pedestrians and cyclists are intended to promote walking and cycling by making them a more attractive option to the private car.

In relation to Design Principle no. 2 (multi-functional streets), the café will create a central place to meet. The proposed public plaza and the public open space in front of Glebe House will provide improved accessibility together with a place to sit and socialize. It will be a vibrant location with people movement which will provide a real sense of place.

With regard to Design Principle no. 3 (pedestrian focus), the design of the scheme has placed a particular focus on the pedestrian. Connectivity to/from the scheme is heavily weighted towards the pedestrian. There will be a new controlled pedestrian link from Somerville Drive and beyond to the nearby local shops and Crumlin village and to the surrounding road networks and public transport services. The public plaza and public open space has been designed to provide a sense of enclosure and to be active with good passive surveillance in order to enhance pedestrians' sense of safety and well-being within this area.

In respect of Design Principle no. 4, (multi-disciplinary approach), the design of the proposed scheme has been developed through the design team working closely together. The proposed development design is led by Reddys A+U working together with NRB traffic engineers, Ait Landscape Architects and Cora Consulting Engineers. The design team have also liaised with Dublin City Council.

Further detail is set out in the *DMURS Design Statement Technical Note* from NRB Consulting Engineers.

7.3.12 Architectural Heritage Protection Guidelines for Planning Authorities (2011)

The *Architectural Heritage Protection Guidelines*, at section 13.8, address the issue of *Other Development Affecting the Setting of a Protected Structure or an Architectural Conservation Area*.

The Guidelines state that, new development both adjacent to, and at a distance from, a protected structure can affect its character and special interest and impact on it in a variety of ways. The proposed development may directly abut a protected structure, for example with buildings in a terrace. Alternatively, it may take the form of a new structure within the attendant grounds of a protected structure. A new development could also have an impact, even when it is detached from the protected structure and outside the curtilage and attendant grounds, but is visible in an important view of or from the protected structure.

The impact of the proposed development on the built heritage in the area has been assessed in the *Heritage Impact Assessment* prepared by Mullarkey Pedersen. It is noted in the report that, in relation to Glebe House, the architectural significance lies

in the composition of the external facades, which are good examples of the architectural style of this period.

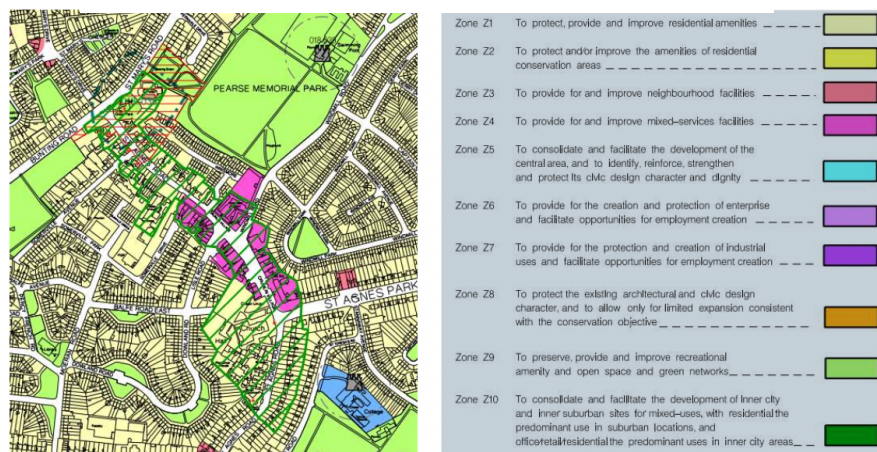
As noted in the detailed *Heritage Impact Assessment*, the historic village context, defined by middle-sized detached houses similar to Glebe House, has been largely replaced by smaller scale 20th century suburban development. Glebe House now presents as an isolated and decontextualised presence on St Agnes Road. The new proposal introduces a new spatial ordering of Crumlin village, which reflects contemporary social and economic development.

This shift is generated by a general recognition that the city must consolidate itself and increase its density to achieve a long term sustainability. The spatial consequence of this, within the context of a growing population, is an increase in density and a corresponding increase in urban scale.

Whilst the proposed scheme marks a departure from the suburban scale of contemporary Crumlin. Collectively the new apartment buildings produce a more urban, larger scale presence which does not and should not correspond to the low scale, low density development which surrounds it. The design adapts locally to its specific context and in particular to Glebe House. The heights of the proposed apartment blocks decrease, to reduce visual impact, as they approach the Protected Structure. The flanking symmetrical pavilions are slightly lower and have smaller mass than Glebe House, in order to ensure their subordination to the Protected Structure.

7.4 Local Planning Context

Dublin City Development Plan 2016-2022



Zoning Map Dublin city Development Plan 2016-2022

The site is zoned *Sustainable Residential Neighbourhoods* – Zone Z1 Land-Use Zoning Objective Z1: *To protect, provide and improve residential amenities.*

The vision for residential development in the city is one where a wide range of accommodation is available within sustainable communities where residents are within easy reach of services, open space and facilities such as shops, education, leisure, community facilities and amenities, on foot and by public transport and where adequate public transport provides good access to employment, the city centre and the key district centres. In both new and established residential areas, there will be a range of uses that have the potential to foster the development of new residential communities. These are uses that benefit from a close relationship with the immediate community and have high standards of amenity, such as convenience shopping, crèches, schools, nursing homes, open space, recreation and amenity uses.

The lands immediately adjacent to the north, west and south of the site also largely fall under Zoning Objective Z1 with the current predominant land use being residential in nature. The properties to the east of the site are categorised under 'Zoning Objective Z4: To provide for and improve mixed-services facilities.' A number of further zoning objectives relate to land in the vicinity including:

- Land Use Zoning Objective Z4: To provide for and improve mixed services facilities.
- Land Use Zoning Objective Z9: To preserve, provide and improve recreational amenity and open space and green networks.

Section 16.4 of the Development Plan outlines that the Planning Authority will promote sustainable residential densities in accordance with the standards and guidance set out in the DEHLG Guidelines on Sustainable Residential Development in Urban Areas and having regard to the policies and targets in the Regional Planning Guidelines 2010–2022 or any Regional Spatial and Economic Strategy that replaces the regional planning guidelines. Sustainable densities promoting the highest quality of urban design and open space will be sought by the City Council in all new developments. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity. Public transport capacity will also be used to determine the appropriate density allowable

Section 16.10.4 of the Plan states

Proposals should have regard to the DEHLG's Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual 2009, the Guidelines on Local Area Plans and the related Manual, 2013 and joint DTTS and DECLG's Design Manual for Urban Streets and Roads (DMURS), 2013 in the making of sustainable neighbourhoods, as well as the principles and key characteristics of a good neighbourhood, as set out in the chapter on Sustainable Communities and Neighbourhoods.

It is noted that all proposals for higher densities must demonstrate how the proposal contributes to place-making and the identity of an area, as well as the provision of community facilities to facilitate the creation of sustainable neighbourhoods. In relation to the requirement for higher densities, specific policies of the Development Plan outline the Planning Authority's commitment to achieving a more compact, sustainable urban form through increased densities.

The following table sets the relevant policy objectives of the current development plan which have been reviewed and the consistency of the proposed development with these requirements.

Chapter 3 – Addressing Climate Change

Policy Consistency

<i>CC3: To promote energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments.</i>	The Energy Report prepared by Dynamic Design confirms that the proposed development passes all criteria to comply with NZEB.
<i>CC4: To encourage building layout and design which maximises daylight, natural ventilation, active transport and public transport use.</i>	The proposed development includes c. 59% dual aspect apartments, reduced car parking standards, and is in close proximity to numerous bus routes.
<i>CCO14: To support the government's target of having 40% of electricity consumption generated from renewable energy sources by the year 2020.</i>	The proposed development includes solar PV panels which will increase the proposed development's energy consumption from renewable sources.
<i>CCO15: To facilitate the provision of electricity charging infrastructure for electric vehicles.</i>	The proposed development includes 10% EV charging points as required by the Development Plan.

Chapter 4 – Shape and Structure of the City

Policy

Consistency

<i>SC10: To develop and support the hierarchy of the suburban centres, ranging from the top tier Key District Centres, to District Centres/Urban Villages and Neighbourhood Centres, in order to support the sustainable consolidation of the city and provide for the essential economic and community support for local neighbourhoods, including post</i>	The proposed development is located within the established residential area of Crumlin, within close proximity to several neighbourhood centres. The proposal will consolidate and increase the density of the area which will support the existing services in the area.
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<i>offices and banks, where feasible, and to promote and enhance the distinctive character and sense of place of these areas</i>	
<i>SC12: To ensure that development within or affecting Dublin's villages protects their character</i>	The subject site is a brownfield site with former industrial buildings, located off St Agnes Road. The proposed development will enhance the setting of Glebe House and the Conservation Area to the front of the site and will not detract from the character of Crumlin village but rather enhance the character of the area with this proposed development.
<i>SC13: To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.</i> <i>SC14: To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces</i>	The surrounding area is predominantly two storey terraced and semi-detached low density housing. This proposal will introduce a new form of development, an apartment development which provides one, two bed and three bed apartments, providing variety and choice to the existing provision. The layout of the site, the design of the buildings and the landscaping of the space will provide an attractive urban space, enhancing the character of the village and providing further permeability to the area.
<i>C15: To recognise and promote green infrastructure and landscape as an</i>	The provision of a new public open space to the front of Glebe House will further

<p><i>integral part of the form and structure of the city, including streets and public spaces</i></p>	<p>enhance and promote the existing green infrastructure in the area.</p>
<p><i>SC19: To promote the development of a network of active, attractive and safe streets and public spaces which are memorable, and include, where appropriate, seating, and which encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.</i></p> <p><i>SC20: To promote the development of high quality streets and public spaces which are accessible and inclusive, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities.</i></p>	<p>The proposed development is a pedestrian dominated development, and as such, most surfaces are pedestrian only areas with a either shared space to access the car park. The development will provide visual interest and activity within Crumlin through the incorporation of public open space a café and increased residential density</p>
<p><i>SC25: To promote development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods, such that they positively contribute to the city's built and natural environments. This relates to the design quality of general development across the city, with the aim of achieving excellence in the ordinary, and which includes the creation of new landmarks and public spaces where appropriate.</i></p> <p><i>SC29: To discourage dereliction and to promote the appropriate sustainable re-development of vacant and brownfield lands, and to prioritise the re-development of sites</i></p>	<p>This proposed development will provide for the development of a brownfield former industrial site within the built-up area. The site has been vacant for some time and does nothing to contribute to the quality of the village. The proposed development will introduce an attractive new modern residential development which is of high-quality architectural design. It will provide a new public open space to the front of Glebe House which will become a key landmark in Crumlin. This is a highly sustainable design which will redevelop a vacant brownfield site and will be a positive contribution to the urban architecture of the city</p>

identified in Dublin Inner City Vacant Land Study 2015	
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Chapter 5 – Quality Housing

Policy

Consistency

<p>QH1: To have regard to the DECLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007); 'Delivering Homes Sustaining Communities – Statement on Housing Policy' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2015) and 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009).</p> <p>Consistency</p> <p>Compliance with Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) is demonstrated under the heading 'Statement of Consistency with National and Regional Policy'. Compliance with the Apartment Guidelines standards and the Urban Design Manual is demonstrated under the heading 'Statement of Consistency with Relevant Section 28 Guidelines'.</p>	<p>We refer to the Schedule of Accommodation prepared by Reddy A+U for more information and note that the scheme complies with the qualitative and quantitative standards outlined in the guidelines.</p>
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<p>QH3: (i) To secure the implementation of the Dublin City Council Housing Strategy` in accordance with the provision of national legislation. In this regard, 10% of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/or affordable housing in order to promote tenure diversity and a socially inclusive city.</p>	<p>The applicant has engaged with the Housing Department at Dublin City Council with regard to Part V. The proposed Part V submission is enclosed with the application and is in accordance with this policy and national guidance.</p>
<p>QH5: To promote residential development addressing any shortfall in housing provision through active land management and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites.</p>	<p>The proposed development will provide new apartments at this suburban infill site in the established area of Crumlin, in close proximity to existing services and public transport options.</p>
<p>QH6: Attractive mixed use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities and which are socially mixed in order to achieve a socially inclusive city.</p>	<p>The development as proposed provides for a well-designed development which will provide for a new housing typology and tenure within the immediate area. It will also provide for a new attractive public realm, a café and creche facilities for the residents and for the local community.</p>
<p>QH7: To promote residential development at sustainable urban densities throughout</p>	<p>We refer to the Schedule of Accommodation which shows the density of the scheme is 179 units</p>

<p><i>the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.</i></p>	<p>per hectare. This density is considered a sustainable urban density for this site.</p>
<p><i>QH8: To promote the sustainable development of vacant or under-utilized infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and the character of the area.</i></p>	<p>The proposed development will redevelop an underutilized brownfield site within Crumlin and will provide a high-density development which is respectful of the character of the surrounding area.</p>
<p><i>QH10: To support the creation of a permeable, connected and well-linked city and discourage gated residential developments as they exclude and divide established communities</i></p>	<p>The site will open up a pedestrian route during daylight hours from the southern boundary along Somerville Drive through to St Agnes Road thus creating a well-connected and permeable neighbourhood. The new pedestrian route will be operated in a similar fashion to the Dublin City Parks which are closed from dusk to dawn. A time lock will be used to operate the gate.</p>
<p><i>QH12: To promote more sustainable development through energy end-use efficiency, increasing the use of renewable energy, and improved energy performance of all new development throughout the city by requiring planning applications to be supported by information indicating how the proposal has been designed in accordance with the development standards set</i></p>	<p>The scheme design employs the most up-to-date design and construction techniques that will improve energy performance throughout the scheme.</p>

out in the Development Plan	
QH13: To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in The Residential Quality Standards and with regard to the Lifetime Homes guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities'	All units are sized to allow some minor internal reconfiguration and adaptation. The Residential Quality Standards are set out below. Section 5.2 of the Department of Environment, Heritage and Local Government 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) is addressed in this Statement of Consistency with National and Regional Planning Policy.
QH14: To support the concept of independent living and assisted living for older people, to support the provision of specific purpose-built accommodation, and to promote the opportunity for older people to avail of the option of 'downsizing'. To support the promotion of policies that will: Encourage/promote full usage of dwellings units, Incentivise property owners of underutilised dwellings to relocate to smaller age friendly dwellings	The apartment scheme includes lifts within Blocks A and B making these apartments suitable for older people or people with reduced mobility. The proposed development complies with Part M. The housing mix of one, two bed and three bed units provide an opportunity for older people to downsize within the area which would in turn allow larger units in the area to be used by families with young children.
QH15: To require compliance with the City Council's policy on the taking-in-charge of residential developments. Consistency	All public/communal spaces are generously proportioned and regular in size to facilitate maintenance and up-keep. Circle VHA CLG will operate the management company to manage the apartments.

<p>The proposed development does not include any lands to be taken in charge.</p> <p><i>QH16: To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas and facilities in the context of the Multi-Unit Developments Act 2011, the Property Services (Regulation) Act 2011 and the establishment of the Property Services Regulatory Authority.</i></p>	
<p><i>QH18: To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.</i></p>	<p>All apartments front the areas of public open space and communal space and Somerville Drive and internal access route. All apartments will have private amenity space in the form of balconies which will provide for safe and secure private amenity space. The scheme also includes communal open space for the residents and public open space for the wider area. The social infrastructure in the area is assessed in detail in the Community and Social Infrastructure Audit submitted with this application.</p>
<p><i>QH19: To promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive, sustainable mixed-income, mixed-use neighbourhoods supported by appropriate</i></p>	<p>The unit mix is conducive to the creation of a well-balanced residential community given the high level of larger family units in the wider area.</p>

social and other infrastructure. Consistency	
QH21: To ensure that new houses provide for the needs of family accommodation with a satisfactory level of residential amenity, in accordance with the standards for residential accommodation	The proposal will ensure a high quality of living for residents with generous internal living spaces, storage areas, and private open spaces
QH22: To ensure that new housing development close to existing houses has regard to the character and scale of the existing houses unless there are strong design reasons for doing otherwise.	The scale and form of the apartment blocks combined with the proposed materials and palette of colours will harmonise and integrate the entire residential scheme with the area. The higher element of Block A at 6 floors is set back from Somerville Drive and Somerville Green and the adjoining streets.

Chapter 8 Movement and Transport Policy.

	Consistency
MT2: Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to cooperate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government's 'Smarter Travel' document and in	The proposed development includes a reduced car parking ratio of 0.5 per apartment and limits vehicular access to the site. This will help to discourage the reliance on private car ownership and promote a modal shift towards more sustainable forms of transport. The reduced car parking provision is appropriate for this site due to the high levels of public transport in the area, its proximity to a wide range of amenities, employment and retail facilities, and the nature of the development. This reduced parking ratio is considered to be appropriate and in accordance with the objectives of Development Plan. The Parking Standards refer to a maximum of 1.5 space per unit in parking zone 3. The plan does emphasise that the standards are maximum in nature and may be reduced based on the site's location, proximity to public transport, local amenities, walking and cycling

<p><i>the NTA's draft transport strategy are key elements of this approach.</i></p> <p><i>MT18: To encourage new ways of addressing the parking needs of residents (such as car clubs) to reduce the requirement for car parking.</i></p> <p><i>MT13: To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.</i></p> <p><i>MT17: To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.</i></p> <p>Consistency</p>	<p>infrastructure, availability of car clubs and electric car charging points.</p> <p>The Development Plan standards also suggest that when a reduction in parking provision is sought for any new development, it should not reasonably give rise to negative impacts on the amenities of surrounding properties or on the immediate street once the development is occupied – and that there is no potential negative impact on traffic safety.</p>
<p><i>MTO23: To require Travel Plans and Transport Assessments for all relevant new developments and/or extensions or alterations to existing developments, as outlined in Appendix 4.</i></p>	<p>A preliminary Travel Plan has been prepared by NRB. Also enclosed is a letter from Circle VHA CLG setting out they intend to manage car parking at the site.</p> <p>The Board may consider the 0.5 ratio a Material Contravention of the plan and in this regard the reduced carparking provision is addressed in the accompanying Material Contravention Statement.</p>

Chapter 10 – Green Infrastructure, Open Space and Recreation Policy.

Consistency

<p><i>GI3: To develop linear parks, particularly along waterways, and to link existing parks and open spaces in order to provide green chains throughout the</i></p>	<p>The proposed development includes a public open space in front of Glebe House which will be accessed from St Agnes Road and from the</p>
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<p>city. Where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway.</p> <p>GI5: To promote permeability through our green infrastructure for pedestrians and cyclists GIO2: To apply principles of Green Infrastructure development to inform the development management process in terms of design and layout of new residential areas, business/industrial development and other significant projects. GI30: To encourage and promote tree planting in the planning and development of urban spaces, streets, roads and infrastructure projects.</p>	<p>pedestrian gate from Somerville Drive. The proposal includes a pedestrian route along the east boundary of the site which will provide a safe route for pedestrians through the site. All public and communal spaces will be landscaped and planted with trees/shrubs to improve tree cover and enhance biodiversity on site.</p>
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Chapter 12 – Sustainable Communities and Neighbourhoods

Policy

Consistency

<p>SN4 To have regard to the Department of Housing, Planning, Community and Local Government's Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010, the Guidelines on Local Area Plans and the related Manual, 2013 and the joint DTTS and DCLG's Design Manual for Urban Streets and Roads (DMURS), 2013 and the NTA's Permeability Best Practice Guide, 2015, in the making of sustainable neighbourhoods. (www.environ.ie) Compliance with the Department of Housing, Planning, Community and Local Government's Guidelines on Sustainable Residential Development in Urban Areas and its accompanying Urban Design Manual, 2010, and the Design Manual for Urban Streets and Roads (DMURS), 2013 is demonstrated under the heading</p>	<p>A Community and Social Infrastructure Audit has been completed and submitted as part of this application. The site is well served by community infrastructure including primary schools and no. post primary. Please see the Community and Social Infrastructure Audit submitted with this application for further detail.</p>
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<p><i>‘Statement of Consistency with Relevant Section 28 Guidelines’.</i></p> <p><i>SN5 To ensure that applications for significant large new developments (over 50 units) are accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.</i></p>	
<p><i>SN15 To ensure the optimum use of community facilities and that high-quality facilities are accessible to all.</i></p>	<p>The proposal includes a public open space that will serve the wider community. It has been designed with high-quality materials and facilities and will be accessible to all.</p>
<p><i>SN17 To facilitate the provision in suitable locations of sustainable, fit-for-purpose childcare facilities in residential, employment, and educational settings, taking into account the existing provision of childcare facilities and emerging demographic trends in an area.</i></p>	<p>The proposed development is expected to generate a demand for childcare spaces and will be catered for on site in the proposed childcare facility.</p>
<p><i>SN20 To promote the development of both indoor and outdoor facilities/spaces for young people e.g. multi-use games areas (MUGAs), teenage shelters, skateboarding areas and skateboard parks, youth cafés, youth centres, and kids clubs.</i></p>	<p>The proposed development includes communal open space which incorporates c.100sq.m children’s play area. The site is located in close proximity to a number of existing open spaces and sports facilities. These are outlined in detail in the Community and Social Infrastructure Audit.</p>
<p><i>SN30 To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, i.e. children, people of working age, the elderly, people with disabilities.</i></p>	<p>The proposed development will provide one, two and three bed units which will cater for smaller households and some family units. In addition, the units are designed to be fully accessible.</p>

Chapter 16 – Development Standards

Policy	Consistency
<p>16.2.2.1 Large-Scale Development</p> <p><i>To create new compositions and points of interest to provide high-quality new streets, squares and open spaces, where appropriate, linked to the surrounding street pattern, to maximise accessibility To retain existing and create new features to make an easily understandable urban environment, including active building frontages with clearly defined edges and safe public routes</i></p> <p><i>To provide an appropriate mix of uses comprising retail, residential, entertainment, recreational, cultural, community- and/or employment generating uses; particular emphasis should be given to new and complementary uses and facilities that expand and improve the existing range of uses and facilities in the area.</i></p> <p><i>To carefully integrate appropriate planting and trees.</i></p> <p><i>To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks</i></p> <p><i>Ensure waste storage facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse</i></p>	<p>The proposed development will provide a new residential development on this brownfield former light industrial site in the established area of Crumlin. The proposed apartment buildings and pavilions together with the refurbishment of Glebe house to provide two apartments will enhance the character of the site currently in an unkept state. The proposal also provides a new public open space that will serve both the proposed development and the wider community.</p> <p>The subject site is located in a predominately residential area with neighbourhood facilities and employment uses within walking distance of the site. The public open space will serve both the proposed development and surrounding area.</p> <p>The proposed development includes a detailed landscaping plan prepared by Ait Landscape Architects.</p> <p>To take into account existing and likely future patterns of traffic NRB Consulting Engineers have prepared by Traffic Impact Assessment for the proposed development.</p> <p>The proposed development will connect the existing services infrastructure in the area. Please see the Infrastructure Report prepared by Cora Consulting Engineers for further details.</p> <p>The proposed bin stores have been carefully located to minimise their visual impact. Please see the Operational Waste & Recycling Management Plan prepared by AWN for further detail</p>

<p><i>impacts on users of highways in the surrounding neighbourhood.</i></p>	
<p>16.2.2.2 Infill Development <i>Dublin City Council will seek to ensure that infill development respects and complements the prevailing scale, architectural quality and the degree of uniformity in the surrounding townscape.</i> <i>Consistency.</i></p>	<p>The proposed development has been designed to integrate into, and respect, the surrounding area. The proposed building heights step up to six storeys with the lower floors adjacent to Glebe House and are stepped back from the existing houses. Blocks A is stepped back in height from the adjoining site boundaries to minimise the impact on the adjoining residential properties</p>
<p>16.3.3 Trees <i>Dublin City Council will consider the protection of existing trees when granting planning permission for developments and will seek to ensure maximum retention, preservation and management of important trees, groups of trees, and hedges.</i> <i>There are 4 mature Sycamore trees to the front of Glebe House and of the boundary.</i> <i>A tree survey must be submitted where there are trees within a proposed planning application site, or on land adjacent to an application site that could influence or be affected by the development.</i></p>	<p>It is proposed to retain three boundary trees while removing two trees. Post construction the site will be planted up with supplementary trees and hedging.</p> <p>An Arboricultural Assessment, Impact Statement and Method Statement has been completed and submitted with this application. It has advised that the three trees along the front boundary can be retained which will help blend this development into its surrounding environment.</p>
<p>16.5-16.6 Plot Ratio and Site Coverage <i>The indicative plot ratio for Z1 lands is 0.5-2.0</i> <i>The indicative Site Coverage for Z1 lands is 45% – 60%.</i></p>	<p>The proposed plot ratio of 1.79 is within the range for Z1 Residential Zoned Lands The proposed site coverage of 49 % is within the indicative limit for Z1 Residential Zoned Lands</p>

<p>16.7 Building Height</p> <p><i>The Development Plan identifies the maximum height of the 'low rise rest of city' as 28m. The subject site is located outside the 'inner city' as identified in Map K. The Development Plan notes that the outer city has a maximum height of up to 16m.</i></p>	<p>The proposed development includes a height in excess of 16m in part of Block A with the height rising to 20.1m at the 6th floor and 17m for the remainder of the Block. The fifth-floor element of Block B is also 17m.</p> <p>A Material Contravention Statement is submitted with the SHD application</p>
<p>16.9 Roads and Services</p> <p><i>Roads and services must adhere to DMURS and be designed to taking-in charge standards.</i></p> <p><i>All services must be provided underground in the interests of amenity except where it is clearly shown by a statutory undertaker that underground location is of an impractical nature.</i></p>	<p>The proposed streets have been designed in line with DMURS. Please see the DMURS Statement prepared by NRB Consulting Engineers</p> <p>All services are provided underground. Please see the Infrastructure Report and drawings prepared by Cora Consulting Engineers.</p>
<p>16.10.1 Residential Quality standards – Apartments</p> <p>Minimum overall apartment floor area</p> <ul style="list-style-type: none"> • Studio-type 40 sq.m • 1-bed 45 sq.m • 2-bed 73 sq.m • 3-bed 90 sq.m <p>It is a requirement that the majority of all apartments in a proposed scheme of 100 units or more must exceed the minimum floor area standard by at least 10%.</p> <p>Each apartment development shall contain:</p> <ul style="list-style-type: none"> • A maximum of 25-30% one-bedroom units • A minimum of 15% three-or more bedroom units <p>There shall be a maximum of 8 units per core per floor, subject to compliance with the dual aspect ratios specified</p>	<p>All apartment units comply with the relevant Residential Quality Standards. Please see the Housing Quality Assessment prepared by Reddys A+U for further details.</p> <p>69% of the units are in excess of the minimum apartment sizes</p> <p>The proposal is not in line with the % of one bed and three bed requirements as set out in the plan with 49% one beds and 3% three beds. Please see the Material Contravention Statement for further detail.</p> <p>The development is designed to have two stair cores and two lift core to serve</p>

<p>above, and with building regulations.</p> <p>Deck access may be acceptable as long as bedrooms do not face out on to the deck and it is well proportioned and designed.</p> <p>Minimum widths for main living/dining rooms:</p> <p>Studio: 5m, 1 bed unit: 3.3m; 2 bed unit: 3.6m; 3 bed unit: 3.8m</p> <p>Minimum kitchen/ living/dining floor area:</p> <p>Studio: 30sqm; 1 bed unit: 23sqm; 2 bed unit: 30sqm; 3 bed unit: 34 sqm.</p> <p>Minimum bedroom widths: 73 Studio: 5m; single bedroom: 2.1m; double bedroom: 2.8m; twin bedroom: 2.8m</p> <p>Minimum bedroom floor area:</p> <p>Studio: 30sqm; single bedroom: 7.1sqm; double bedroom: 11.4sqm; twin bedroom: 13sqm.</p> <p>Minimum aggregate bedroom floor areas:</p> <p>Studio: 11.4sqm; two bedrooms: 24.4sqm; three bedroom: 31.5sqm</p> <p>Storage</p> <p>All apartments shall be provided with designated internal storage space separate to the area for kitchen presses, bedroom furniture or areas containing the cold and hot water tanks and should be designed for ease of access and use.</p> <p>Private Open Space</p>	<p>Block A and three stair cores and two lift core to serve Block B.</p> <p>Block A has 79 units over 6 floors, with two cores serving this block which equates to less than 8 per core.</p> <p>Block B has 66 units over 5 storeys with three cores serving this block which equates to less than 6 per core.</p> <p>The HQA prepared by Reddys R+U Architects and submitted with the application sets out the sqm of all proposed bedrooms, living/kitchen/dining rooms, storage rooms, and private open space.</p> <p>The proposed development complies with all the standards outlined here. It is worth noting that these standards align with those set out in the Apartment Guidelines.</p> <p>All apartments are provided with private open space, to standard, as balconies or terraces. The terraces at ground floor level have been carefully</p>
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<p>Private Open Space Private open space shall be provided in the form of gardens or patios/ terraces for ground floor apartments and balconies at upper levels. Where provided at ground floor level, private amenity space shall incorporate boundary treatments appropriate to ensure privacy and security. Where balconies or terraces are provided, they should be functional, screened with opaque material, have a sunny aspect, and allow all occupants to sit outside, including wheelchair users. They should also minimise overshadowing and overlooking. The primary balcony should be located adjacent to the main living areas to extend the apartments' living space. The minimum depth of private amenity open space (balcony or patio) shall be 1.5 m.</p> <p><i>Minimum Area For Private Open Space</i> <i>Studio Unit: 4 sq.m</i> <i>1-bedroom unit: 5 sq.m,</i> <i>2-bedroom unit: 7 sq.m,</i> <i>3-bedroom unit: 9 sq.m.</i></p> <p><i>Communal Open Space</i> <i>Development proposals shall demonstrate that the communal open space</i></p> <ul style="list-style-type: none"> <i>•complies with the minimum standards set out below</i> <i>• will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics</i> <i>• is secure for residents and benefits from passive surveillance</i> <i>• considers the needs of children in particular in terms of safety and supervision. In schemes of 25 or more units small play spaces of 85-100 sq.m are</i> 	<p>designed to ensure appropriate privacy and security. The balconies/terraces are all accessible off the kitchen/living/dining areas. The minimum depth of the private open spaces is 1.5m. The Terraces and Balconies all comply with the minimum space requirements.</p> <p>The proposed development provides c.1632 sqm of communal open space in two separate spaces (at Podium level and behind block A). The locations of these spaces will ensure the spaces are safe and secure for the residents with passive surveillance provided by the apartment blocks. The areas</p>
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<p><i>considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should be provided.</i></p> <ul style="list-style-type: none"> • <i>is wheelchair accessible</i> • <i>achieves good sunlight penetration</i> • <i>has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections.</i> <p><i>Minimum area for communal amenity space: Studio: 4 sq. m, One bedroom: 5 sq. m, Two bedroom: 7 sq. m, Three bedroom: 9 sq.</i></p> <p><i>Communal Facilities</i> <i>Communal Facilities Communal facilities may be provided in apartment schemes, particularly in larger developments such as community or meeting rooms, laundry rooms etc. which are accessible to residents only.</i></p> <p><i>Cycle Parking:</i> <i>All new apartment developments shall provide provision for cyclists in keeping with the requirements set out in Table 16.2 of Section 16.39 Cycle Parking. Table 16.2 sets out the minimum bicycle parking standards for all development in the city. The development plan requires the provision of one cycle parking space per residential unit.</i></p>	<p>have been carefully landscaped, as shown in the submitted landscaping plan, with soft and hard landscaping. A children's play area is incorporated into the podium space. The proposed public and communal open spaces will provide seating and grassy area.</p> <p>Based on the communal open space requirements the proposal requires c. 910 sqm communal open space. The proposal includes c.1632 sqm communal open space which exceeds this requirement.</p> <p>The proposed apartment units include space for laundry facilities within each apartment unit. Therefore, no communal laundry facilities are provided. We refer to the Architects Design Statement which includes the layout and facilities within the blocks</p> <p>The proposed development includes a ratio of 2 cycle parking spaces per residential unit which includes visitor spaces. This exceeds the Development Plan minimum standards.</p>
<p>16.10.2 Residential Quality Standards- Apartments and Houses Public Open Space</p>	<p>The proposed development includes 10% of the subject site as open space and in line with the requirement for 10%</p>

<p><i>Public Open Space</i></p> <p><i>In new residential developments, 10% of the site area shall be reserved as public open space. All public open spaces shall be of a high quality in terms of design and layout, be located in such a manner as to ensure informal supervision by residents and be visually and functionally accessible to the maximum number of dwellings. Existing features, such as mature trees, shall be retained and enhanced by the open space provided. A landscaping plan will be required for all developments, identifying all public, communal (semi-private) and private open space. The design and quality of public open space is particularly important in higher density areas.</i></p>	<p>open space on Z1 lands. The proposal includes a public open space tree and shrub planting to the front of Glebe House. A landscaping plan is included with the application which identifies public, communal and private open space. All public and communal open spaces are overlooked by the proposed apartment blocks ensuring passive surveillance and informal supervision.</p>
<p><i>Acoustic Privacy</i></p> <p><i>Development should have regard to the guidance on sound insulation and noise reduction for buildings contained in BS 8233:2014. The following principles are recommended for minimising disruption from noise in dwellings:</i></p> <ul style="list-style-type: none"> <i>• Utilise the site and building layout to maximise acoustic privacy by providing good building separation within the development and from neighbouring buildings and noise sources</i> <i>• Arrange units within the development and the internal layout to minimise noise transmission by locating busy, noisy areas next to each other and quieter areas next to quiet areas</i> <i>• Keep stairs, lifts, and service and circulation areas away from noise sensitive rooms like bedrooms. Particular attention should be paid to the siting</i> 	<p>The proposed buildings have been set back from the site boundaries which will help maximise acoustic privacy for both the proposed and existing dwellings. The proposed development consists of apartment units on each floor which are all expected to have similar noise levels. The layout of the apartment blocks has been carefully designed to minimise noise impacts on the apartment units.</p>

<p><i>and acoustic isolation of the lift motor room</i></p>	
<p>16.10.4 Making Sustainable Neighbourhoods</p> <p><i>All proposals for new development over 15 units or 1,500 sq. m must demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to place-making and the identity of an area</i></p> <p><i>100 units or 10,00sqm Proposals for new development greater than 100 dwellings or 10,000 sq.m and for public transport infrastructure, in addition to making a contribution to social infrastructure, shall include an Urban Design Statement that addresses the following issues:</i></p> <ul style="list-style-type: none"> <i>• How any proposed access points, routes or new streets are interconnected logically with the existing local network of streets, to aid legibility, permeability and walkability and complement local ‘desire lines’</i> <i>• How the development will contribute positively to the quality of the streets and public spaces surrounding it; this should include graphic material showing how the development will contribute to the character of the street and its activity and to the quality of the pedestrian environment</i> <i>• How the development will contribute to a coherent enclosure for the street or public space including consideration of the proportions and activities of the buildings on both sides of a street or surrounding a public space</i> <i>• How the proposals impact on, or are affected by, other planned development in the local area. Where a number of developments are proposed in proximity to each</i> 	<p>We refer to the design rationale prepared by Reddys A+U Architects for more information as to how the proposal constitutes a positive urban design response to the local context and how it contributes to place-making and the identity of an area.</p> <p>It is considered that this planning application includes all the necessary information pertaining to existing facilities in the area. It is envisaged that the development will be carried out in one phase. An Architect’s Design Statement is included with the application together with a Community and Social Infrastructure Audit which includes an assessment of the existing facilities, including schools, in the area.</p>

<p><i>other, they may have the potential to cumulatively exert significant change on a neighbourhood. Where this is the case, any potential conflicts or opportunities for synergies or economies should be examined</i></p> <ul style="list-style-type: none"> <i>• How the layout and design of buildings, public realm or infrastructure respond to the series of non-prescriptive questions as set out in the DEHLG's Urban Design Manual, to be considered during the key stages of the design and planning process; proposals should also demonstrate how they address the principles as set out in the Neighbourhood Section of the Urban Design Manual</i> <i>• How communal amenity spaces within residential developments are designed to be clearly distinct from fully public spaces and their scale and activities appropriate so as to fit within the local network of planned or existing public spaces.</i> 	
<p>16.38.5 Disabled Car Parking <i>At least 5% of the total number of spaces should be designated car-parking spaces, with a minimum provision of at least one such space</i></p>	<p>The proposal includes 3 universal access car parking spaces.</p>
<p>16.38.6 Motorcycle Parking New developments shall include provision for motorcycle parking in designated, signposted areas at a rate of 4% of the number of car parking spaces provided.</p>	<p>The proposal includes 6 no. motorcycle spaces (6% of the number of the car parking spaces provided).</p>

Detailed Assessment of Specific Policy Requirements

Building Height

Section 4.5.4.1 of the Development Plan covers Dublin City Council's Approach to Taller Buildings and it is noted that the majority of the City area is identified in the

Development Plan as not being suitable for mid-rise or taller buildings and accordingly, the spatial approach to taller buildings is *“to protect the vast majority of the city as a low-rise city”*. However, the potential and need for taller buildings to deliver the Core Strategy is also recognised in the Development Plan.

Section 16.7 of the Development Plan outlines the development standards in relation to building height in a sustainable city. The subject site is not located in an area designated for high rise or medium rise as per the Development Plan, and therefore the maximum permissible height of 16m for outer city residential development applies to the proposed scheme.

The proposed blocks exceed the Development Plan’s maximum permissible height of 16m for outer city residential development (highest element 20.1 m to parapet.) and therefore materially contravene the Development Plan in relation to building height.

Notwithstanding the above, all proposals for mid-rise and taller buildings must have regard to the following assessment criteria for high buildings:

- Relationship to context, including topography, built form and skyline, having regard to the need to protect important views, landmarks, prospects and vistas;
- Effect on the historic environment at a city-wide and local level;
- Relationship to transport infrastructure, particularly public transport provision;
- Architectural excellence of a building which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for;
- Contribution to public spaces and facilities, including the mix of uses;
- Effect on the local environment, including micro-climate and general amenity considerations;
- Contribution to permeability and legibility of the site and wider area;
- Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, a 360 degree view analysis, shadow impact assessment, wind impact analysis, details of signage, branding and lighting, and relative height studies;
- Adoption of best practice guidance related to the sustainable design and construction of tall buildings;
- Evaluation of providing a similar level of density in an alternative urban form.

The proposed development materially contravenes the Development Plan in terms of building height (part of Block A rising to 20.1 metres and the remainder of block A and the fifth floor element of Block B rising to 17m), the design of the proposed strategic housing development has incorporated the criteria for mid-rise and taller buildings outlined in the Development Plan including its relationship to the receiving context including St Agnes Road, Somerville Drive and Somerville Green, the protection of important views of Glebe House and other Protected Structures in the Crumlin ACA, its close proximity to public transport infrastructure, the contribution of high quality urban parks with permeable pedestrian access through the site to residential estates to the rear.

The design of the proposed residential scheme has responded to the context of the site, with the increased height set back from Somerville Drive and the open space mitigating the impact on residential amenity. The two main blocks step down towards Glebe House and towards Somerville Green, in order to reduce the visual impact on these residential dwellings. The curtilage of Glebe House has been protected and incorporated into the design of the scheme providing a high quality landmark vista thorough the proposed central public open lawn, inviting visitors and residents through the entrances and into the open site.

The impact of the proposed development on the built heritage in the area has been assessed in the Conservation Report prepared by Mullarkey Pedersen. It is noted in the Conservation Report that, in relation to Glebe House, the architectural significance lies in the composition of the external facades, which are good examples of the architectural style of this period. It is submitted that the location of the subject site within the village of Crumlin, in proximity to a public transport corridor and regional road linkages to the M11 and M50, will ensure that the proposed development is well served by existing transport infrastructure. This is consistent with the need to integrate transport with spatial planning, justifying the ongoing investment in public transport infrastructure.

The proposed scheme will provide 905 sq.m of high quality public open space in a formal park to the front of Glebe House and public plaza to the side of the cafe, with circulation routes to the sides of Glebe House. The provision of a café will attract the public into the site, adding a sense of vibrancy to the area. The effect on the local environment, including micro-climate, has been considered in the *Sunlight / Daylight Assessment* Prepared by IES Consulting and the *Wind Study* prepared by AWN Consulting.

It is noted in the Report prepared by IES, *Microclimate: sunlight, daylight, shadow and light effluence*, that any daylight and sunlight impacts to the surrounding area are expected to be negligible and minor. An analysis of the potential loss of sunlight to adjoining gardens shows that the recommendations in the BRE guidelines, *Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*, would be complied with comfortably.

There are no predicted impacts on wind conditions to the surrounding area given the low rise nature of the development at a maximum height of 20m.

The proposed scheme will improve permeability between the site and the wider area, through the provision of a distinct, legible circulation route through the site, linking the open spaces with the two entrances to the site from the front, at Glebe House, and from the rear from Somerville Drive. The improved accessibility will provide pedestrian and cycle linkages through the site and to Crumlin village. The site will benefit from improved access and permeability in line with the aspirations of DMURS, with pedestrians and cyclists prioritised over vehicles. A desire line is catered for by

the proposed scheme with easy pedestrian access provided to the external street network and public transport connections in the vicinity.

It is submitted that the proposed strategic housing development has had regard to the assessment criteria for medium height buildings in the Development Plan and represents an opportunity to provide a high quality sustainable residential development with increased height.

Taking into account the fact that the proposed development exceeds the Development Plan maximum permissible height for residential development, a Material Contravention Statement which sets out why permission should be granted, having regard to considerations specified in Section 37(2) (b) of the Planning and Development Act 2000 (as amended), accompanies the application.

Open Space

For lands zoned Z1, the 10% requirement for public open space will apply as per section 16.3.4 of the Development Plan:

“There is a 10% requirement specifically for all residential schemes as set out in section 16.10.1.”

In terms of design, Section 16.10.3 states:

“All public open spaces shall be of a high quality, be located in such a manner as to ensure informal supervision by residents and be visually and functionally accessible to the maximum number of dwellings. Existing features such as mature trees shall be retained where possible and a landscaping plan is required identifying public, communal (semi-private) and private open space”.

The proposed development includes the provision of 905 sq.m of landscaped public open space across two character areas. These character areas include:

- A formal landscape lawn in front of Glebe house.
- A public plaza between Glebe House, the pavilion café and Block B, through to the pedestrian route to Somerville Drive.

Communal open space is provided in the form of a centrally located landscaped podium courtyard, which is accessible from both apartment buildings and to the rear of Block A. Communal landscaped areas at ground level are also provided. A dedicated area on the podium is provided for play equipment, within sight of the apartment building and ensuring informal supervision by residents. Please refer to Ait’s landscape strategy statement and drawings for details of the high quality landscaping, which is being proposed within all areas of the site.

Residential Amenity

As outlined in the detailed *Design Statement* prepared by Reddy A+U, the floor areas for the proposed apartments would exceed the recommended minimum floor areas in the *Apartment Guidelines* in terms of apartment size, private open space and communal open space. The proposed development offers a good standard of residential amenity for future occupants.

Impact on Adjoining Amenities

The Design Team, in setting out the buildings on the site, gave careful consideration as to how the development would affect houses adjoining and adjacent to the site, including Somerville Drive, Somerville Green and St Agnes Road. The design has been carefully considered to ensure no adverse impact on nearby properties. As detailed in the architectural drawings and design statement prepared by Reddy A+U, the proposed development has been designed to ensure the overall scale, form and design of the proposed residential development has minimal impact on the residential amenities of the surrounding residential properties.

We refer to the *Design Statement* and in particular the section dealing with the Response to the Pre-App Consultation opinion. The *Statement* includes sections with adjacent properties, illustrating that the proposed residential development is appropriately set back from residential properties. The Design Team have carefully considered the position of the buildings in relation to the adjacent properties and both buildings have been carefully designed to avoid any overlooking to Somerville Green.

The proposed development is considered to be of a high quality and designed to avoid direct overlooking and will not adversely impact the residential amenity of adjacent properties.

Daylight, Sunlight and Overshadowing Study

The application is accompanied by detailed *Daylight, Sunlight and Overshadowing Study* prepared by IES which describes shadow analysis, sunlight to Proposed Amenity spaces, average daylight factors and daylight analysis of existing buildings.

Shadow Analysis

The shadow images study include the existing site conditions and the proposed development. The Shadow analysis shows shadows cast from the existing currently undeveloped site and from the proposed scheme at different periods throughout the year. The shadow analysis study concludes that the proposed development would cast minimal additional shading on each of the following potential sensitive receptors: Somerville Green, Somerville Drive and St Agnes Road.

Sunlight to Proposed Amenity Spaces

The BRE's *Site Layout Planning for Daylight and Sunlight* states that for a space to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least two hours of sunlight on the 21st of March.

On March 21st 88% of the combined proposed public amenity spaces and 60% of the combined proposed communal amenity spaces provided within the development will receive at least 2 hours of sunlight over the total area provided, thus exceeding the 50% recommendation noted in the BRE Guide. In addition, all individual spaces meet the BRE recommendations confirming the amenity areas provided will be a quality spaces in terms of sunlight.

Average Daylight Factors within the Development

In terms of the levels of daylight amenity within the proposed development, the assessment examined each room within the development.

Across the proposed development, 95% of all rooms are achieving ADF values above the BRE and BS 8206-2:2008 guidelines when Living/Kitchen/Dining spaces are assessed as whole rooms against a 2% and for Bedrooms 1% ADF target.

Cultural Heritage

Architectural Conservation Areas have been designated in recognition of their special interest or unique historic and architectural character and important contribution to the heritage of the city.

It is Dublin City Council policy to seek to ensure that development proposals within all Architectural Conservation Areas and Conservation Areas complement the character of the area, including the setting of protected structures, and comply with development standards.

The site is located within the Crumlin Village ACA. The development plan states that the ACA mechanism is used to preserve the special character of streetscapes that are of architectural, historical, archaeological, artistic, cultural, scientific, technical or social interest. The proposed area shall fulfil the legal requirements for architectural conservation areas set out in the Planning and Development Acts, 2000 to 2002, by satisfying at least one of the categories of special interest (architectural, historical, archaeological, artistic, cultural, scientific, social, technical), or by contributing to the appreciation of protected structures.

We refer to the detailed Heritage Impact Assessment Report prepared by Mullarkey Pedersen in relation to restoration works to Glebe House and to the works proposed following a recent fire (April 2022) at the property.

Impact & Mitigation

The proposed development represents an intensification of the historic residential use of the site, the introduction of community facilities, including a small café and a creche and the elimination of the existing low grade, light industrial use. This proposal corresponds to the existing adjacent land uses which are primarily residential and small scale retail on St Agnes Road. The residential use of Glebe House itself will continue in the form of two well designed own door residential units. The proposed new residential and ancillary uses and reuse of Glebe House do not negatively affect the significance or special interest of the protected structure.

As noted in the detailed *Heritage Impact Assessment* prepared by Mullarkey Pedersen, the historic village context, defined by middle-sized detached houses similar to Glebe House, has been largely replaced by smaller scale 20th century suburban development. Glebe House now presents as an isolated and decontextualised presence on St Agnes Road. The new proposal introduces a new spatial ordering of Crumlin village, which reflects contemporary social and economic development.

This shift is generated by a general recognition that the city must consolidate itself and increase its density to achieve a long term sustainability. The spatial consequence of this, within the context of a growing population, is an increase in density and a corresponding increase in urban scale.

The proposed scheme marks a departure from the suburban scale of contemporary Crumlin. Collectively the new apartment buildings produce a more urban, larger scale presence which does not and should not correspond to the low scale, low density development which surrounds it. The design adapts locally to its specific context and in particular to Glebe House. The heights of the proposed apartment blocks decrease, to reduce visual impact, as they approach the Protected Structure. The flanking symmetrical pavilions are slightly lower and have smaller mass than Glebe House, in order to ensure their subordination to the Protected Structure.

Assessment of the Impact

It is acknowledged that the massing and scale of the new buildings represents a change to the existing context of Crumlin and of the Protected Structure. Massing is reduced locally to reduce visual impact on Glebe House. While the new apartments are visible above the historic structure when viewed from St Agnes' Road the new pavilions serve to retain the visual primacy of Glebe House.

Much of the conservation significance of Glebe House lay in the role that it played in the civic spatial hierarchy of Crumlin village. As a consequence of 20th century suburban development, its historic context has been lost and it is now detached and alienated from a partially degraded public realm.

As noted in the *Architectural Heritage Assessment*, the most important views of the new development, in relation to the Protected Structure, are those looking from St Agnes Road, the spine of the historic village core.

The apartment blocks are clearly visible behind Glebe House, but their impact is mitigated because the historic house now defines the immediate relationship with St Agnes Road.

It is acknowledged that, while the design does adapt locally to its specific context and in particular to Glebe House, that the massing and scale of the new buildings represents a departure to the existing context in this location in Crumlin and of the Protected Structure.

Crumlin Architectural Conservation Area

Crumlin ACA is centred on the historic village of Crumlin which is arranged around St. Agnes Road, an S-shaped route running north-west to south-east. The northern section of the subject site lies within the ACA. The west side of St. Agnes Road is marked by the former Glebe House. A row of single-storey cottages stands opposite to the east. The Glebe House retains its impressive double-pile, two-storey over basement volume and is well set back from the road. The space to the front is in use as a carpark with a rubble-stone boundary wall and row of chestnut trees. The rear of the site is occupied by an array of recent storage and industrial sheds. This is one of the most important, historic large dwellings of its type remaining in Crumlin and it continues to give strong definition to St. Agnes Road.

Architectural Interest

The predominant architectural character of the village is determined by street architecture dating to the eighteenth and nineteenth centuries, with strong presence of post-war architecture of modest appearance. The historic structures consist of ordered facades of graceful proportion and vertical emphasis, they express the individuality of dwellings and declare public functions such as schools. The village is punctuated by a number of large buildings in key positions reflecting their particular function, designed and built to a high architectural standard as excellent examples of the architectural styles of their period, notable the churches and former national school. Brick facades can be seen in pre- and post-war housing to different extents. A number of protected structures can be found within a short walking distance of the site including Looceville House, the Former Post and Telegraph Office and the Old Church of Ireland Church.

The ACA notes that Glebe House retains its impressive two storey over basement volume and is well set back from the road. Noting that it is one of the most important historic large dwellings remaining in Crumlin continuing to give strong definition to St Agnes Road. The views of the Protected Structure will be retained and the setting out of the open space to the front of the site will ensure the setting of the protected structure is preserved.

Overall, in respect of the impact of the proposed development in relation to character of the area, the development would have no negative impact on the character of the Protected Structures, would not obscure their elevations, would not compromise their setting or special interest and would not conflict with the provisions of either the Development Plan or ACA. There would be a moderate and limited impact on the wider setting of the ACA.

The detailed landscape and visual impact assessment prepared by Áit and James Horan identifies the main views affected within the ACA. In order to evaluate the overall landscape and visual impacts of the proposed residential development, nineteen verified views were assessed from points in the local domain, where there is potential for impact on key sensitive local receptors. Several of these within close proximity to the site capture views of protected structures which are located within the Crumlin ACA. Overall, the impacts are negative and moderate and the conclusion reached is that the proposed development would have a positive impact on the wider urban environment in the vicinity, by replacing a vacant site with a high quality residential scheme and new streetscape. Given the low visual quality and visual dereliction of the site at present, the proposed development, together with the comprehensive landscape design, will create a positive visual and landscape impact within the ACA.

Trees in Architectural Conservation Areas

It is the Policy of Dublin City Council: CHC7:

To protect and manage trees in Architectural Conservation Areas. All trees which contribute to the character and appearance of the Conservation Area will be safeguarded, except where the City Council is satisfied that:

- 1. The tree is a threat to public safety or prevents access to people with mobility problems*
- 2. The tree is not in keeping with the character of the Conservation Area or is part of a programme to rationalise the layout of tree planting in the area, or*
- 3. In rare circumstances, where this is necessary to protect other specimens from disease.*

As set out in the detailed Landscape report prepared by Áit and the detailed Arborist's report and survey, only one tree which is in poor condition along the St Agnes Road boundary is to be removed with three of the trees along the front boundary of the site being retained. The second tree to be removed along the proposed access is in poor condition.

8 Conclusion

We have set out in detail above that the proposed development complies with the provisions of the Dublin City Development Plan, 2016-2022, in all relevant respects, save in relation to building height, car parking provision and unit mix.

We have also shown that the proposed development complies with national and regional policy, as expressed in the NPF, the RSES and relevant Ministerial guidelines, in particular the *Sustainable Urban Housing: Design Standards for New Apartments, 2020*, and the *Urban Development and Building Heights Guidelines for Planning Authorities, 2018*.

We have further demonstrated in the Material Contravention Statement report accompanying this application how the site is suitable for increased height, that the unit mix and car parking provision appropriate and that there is sufficient justification for the Board to permit a material contravention of the Development Plan, should they consider it to arise at application stage, having regard to Section 37(2)(b)(i), (iii) and (iv) of the Planning and Development Act, 2000 (as amended).

In accordance with the provisions of SPPR3 of the *Building Heights Guidelines*, the Board can grant permission for the proposed development, notwithstanding any conflict with the building height provisions of the Dublin City Development Plan, 2016-2022

Having regard to the above, it is submitted that the proposed development is consistent with the Development Management Criteria outlined in section 3.2 of the Building Height Guidelines and is in accordance with national strategic policy set out in the NPF requiring increased residential densities, more compact and integrated communities and the need to grow existing towns and cities upwards rather than outwards. It is submitted that the Board should consider the above in their assessment of the proposed development.

Glebe House Residential Development St. Agnes Road, Crumlin, Dublin.

	1 bed	2 bed	3 bed	Total Apartments	Dual Aspect	Gross Internal Area (GIA) sqm	Private Amenity Space
BLOCK A							
GF	6	6		12	5	1876	95
1st	7	8		15	9	1290	84
2nd	7	8		15	9	1290	104
3rd	5	9		14	9	1263	104
4th	5	9		14	9	1263	104
5th	5	4		9	6	849	55
Sub Total	35	44		79	47	7831	546
	44%	56%	0%	100%	59%		
BLOCK B							
GF	5	1	0	6	1	2268	38
1st	7	6	2	15	9	1389	118
2nd	8	7	1	16	9	1389	120
3rd	10	7	0	17	9	1389	120
4th	8	4	0	12	5	940	133
Sub Total	38	25	3	66	33	7375	529
	58%	38%	5%	95%	50%		
PAVILION 1							
Ground	1	0	0	1	1	63.7	22.72
1st	0	1	0	1	1	63.7	14.5
2nd						40.3	
Sub Total	1	1	0	2	2	167.7	37.22
	50%	50%	0%	100%	100%		
PAVILION 2							
Ground (café + stairwell)	0	0	0	0	0	63.7	58
1st	0	1	0	1	1	63.7	14.5
2nd						40.3	
Sub Total	0	1	0	1	1	167.7	72.5
	0%	100%	0%	100%	100%		
GLEBE HOUSE							
Lower Ground Floor	0	1	0	1	1	54.5	
Ground Floor	0	0	0	0	0	81	
Upper 1st Floor	0	0	0	0	0	15	
First Floor	0	0	1	1	1	75	
Sub Total	0	1	1	2	2	225.5	n/a
	0%	33%	50%	83%	100%		
Totals	74	72	4	150	85	15766.9	1184.72
%	49%	48%	3%	100%	57%		

Block A (ground floor - GIA 1876sqm)

ESB substation					85
Bin store					45
Bike store					44
Car park					553

Block B (ground floor - GIA 2268sqm)

Creche					147
ESB substation					55
Bin store					74
Bike store					160
Car park					1175

Site Area 8789 sqm
 Site Coverage 49%
 Plot Ratio 1.79
 Units per Ha 171
 Communal Open Space 1632sqm 19%
 Public Open Space 905sqm 10%

Documents

Document	Prepared By
Strategic Development Application Form Housing Letter of Consent Dublin City Council Letter of Consent South Dublin County Council DCC Dangerous Building Notice Site Notice (size A3, erected at 5 locations 13.06.2022) Newspaper Notice (published Irish Daily Star 10.06.2022) Response Report to An Bord Pleanála Planning Report and Statement of Consistency. Material Contravention Statement Social & Community Audit Cover Letter to Dublin City Council Cover Letters to Prescribed Bodies	Doyle Kent Planning Partnership Ltd
Design Report Housing Quality Assessment Materials & Finishes Report Part V Report (A4 Booklet) Lifecycle Report Shapefile / CAD file	Reddy A+U
Heritage Impact Assessment Report	Mullarkey Pedersen Conservation Architects
Landscape Report Landscape and Visual Impact Assessment Report	Áit Urbanism and Landscape
Tree Protection Strategy and Method Statement Arboriculture Assessment and Impact Report	CMK Hort+ ARB Ltd
Verified Views CGI's	James Horan Third Eye
Water Services and Flood Risk Assessment. Preliminary Construction Management Plan Site Specific Flood Risk Assessment	Cora Consulting Engineers
Transport Impact Assessment	NRB Consulting Engineers
Daylight & Sunlight & Overshadowing Study Technical Note 10 th June 2022	Integrated Environmental Solutions
Screening Report for Appropriate Assessment Ecological Impact Assessment Report	Openfield Ecology Services
Bat Assessment Report	Altamar
Energy Statement Electrical Infrastructure Statement	Dynamic Design Consultants Dynamic Design Consultants
EIA Screening Report S299B Statement Operational Waste Management Plan Microclimate Assessment (Wind)	AWN

Noise and Vibration Impact Assessment	
Archaeological Assessment Report	IAC
Telecommunications Report	Ism Ireland
Circle Travel plan letter Circle Carparking metrics letter	Circle VHA CLG

Drawings

- Architectural Drawings prepared by Reddy Architecture and Urbanism
- Engineering Drawings prepared by Cora Consulting Engineers
- Landscape Drawing prepared by Ait Urbanism & Landscape
- Arboriculture Assessment Drawings prepared by CMK Hort +Arb
- Lighting Drawing prepared by Dynamic Design