

**Statement of Response to An Bord Pleanála in respect of a  
Strategic Housing Development at the Glebe House and Coruba  
House site, St Agnes Road, Crumlin, Dublin 12.**

**On behalf of Seabren Developments Ltd and Circle VHA CLG**

**June 2022**



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## 1.0 Introduction

This Statement of Response, prepared by Doyle Kent Planning Partnership Ltd, accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on the Glebe House and Coruba Lands, St Agnes Road, Crumlin, Dublin 12.

A request for a Pre-Application Consultation with An Bord Pleanála (under section 6 of the Planning & Development (Housing) and Residential Tenancies Act, 2016) was submitted on 17<sup>th</sup> November 2021, following consultation with Dublin City Council under Section 247 of the Planning and Development Act, 2000 (as amended).

The requested pre-application consultation meeting was held online via Microsoft Teams on 21<sup>st</sup> February 2022.

An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP- 311973-21 on the 28<sup>th</sup> February 2022.

## 2.0 Board Opinion

The opinion states that An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission 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.

Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant was notified 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 statement of response sets out the items to be included following the An Bord Pleanála's pre-application consultation opinion. The statement should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application



### 3.0 Response to Opinion

**1. A report addressing the matters raised in the Transportation Planning report of Dublin City Council, dated 08/12/2021, including inter alia:**

- a) A rationale for the level of car parking provision proposed and a Parking Management Strategy, including detail on the allocation of parking spaces by type and by land use.
- b) A Mobility Management Plan / Travel Plan in respect of the proposed development.
- c) A Quality Audit in accordance with Advice Note 4 of DMURS.
- d) Details of the quantum and design of bicycle parking / storage, having regard to the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments. The design of such parking / storage should consider relevant access and operational requirements.
- e) A Servicing and Operations Management Plan for the proposed commercial and residential uses.

***a) A rationale for the level of car parking provision proposed and a Parking Management Strategy, including detail on the allocation of parking spaces by type and by land use.***

In response to the opinion of the Board, and the issues raised by Dublin City Council Transportation Section a review of on -site car parking provision was carried out. A detailed Transportation Assessment report has been prepared by NRB Consulting engineers to accompany this application. The report includes justification and details of the rationale for the car parking quantum. The layout submitted at pre- app stage provided for a total car parking provision on the site of 58 No spaces. This represented a car parking 'ratio' of 0.38 per units, with 49 no spaces provided at under croft level, 5 dedicated spaces along Somerville Drive and 4 visitor spaces in front of Mount Errol.



Ground Floor Layout Plan Extract – Pre- App submission

Following the meeting with An Bord Pleanála and Dublin City Council the layout has been amended by the omission of two ground floor residential units which allows for an extension of the undercroft car park.



Ground Floor Layout Plan Extract- Proposed

The undercroft car parking has been increased in area so it now provides 66 No parking spaces, taken together with the 5 assigned spaces at Somerville Drive and the 4 visitor spaces in front of Glebe House represents a ratio of 0.5 per unit.

The issues raised in the DCC Transportation Submission have been responded to in detail by NRB and are set out in their report at Section 5. The following is a summary of this response:

- NRB examined the latest available census date (2016) to examine car ownership in the Crumlin area. The data confirms that 20% of the population in the area are commuting as car drivers. It also confirms that nearly 30% of the existing households in the catchment currently have no car. This data further supports the case for the reduced parking provision at the site.
- In relation to the statement from DCC that there are 'limited alternative transport options', NRB have included a Bus Capacity Assessment Report appended to their

Transportation Assessment Report which demonstrates that this location is highly accessible by bus.

The site is served by frequent existing Dublin Bus Services, with Go-Ahead Service #18 & Dublin Bus Service #150 passing the site (the nearest northbound bus stop is located 105m from the existing site access and the nearest southbound bus stop is located 65m from the existing site access).

There are additional services to Crumlin Village such as #27 nearby, with a combined peak period bus frequency of less than 10-minute intervals, representing a high frequency service. In terms of 'Modal Split Targets' the report notes that any such targets are normally and ordinarily set within a working Mobility Management Plan when the development becomes operational and occupied.



Figure 2.1 – Existing Bus Stops North of the Site

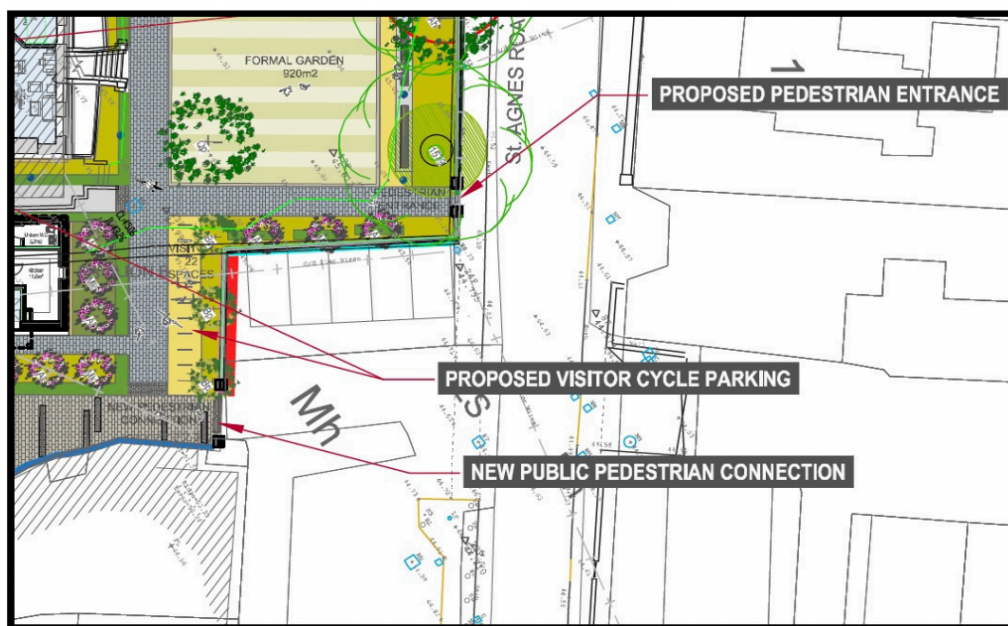


Figure 2.2 – Existing Bus Stops South of the Site



- There are 4 short stay visitor parking spaces provided in front of Glebe House, which can be used for Creche Drop Off. There will be no drop off on Somerville Drive, and parents will be advised of the arrangements upon enrolment. The facility will support the local area and community, being a childcare facility located within easy walking distance for residents. In addition, cycle parking spaces are proposed immediately beside the Creche facility, supporting & promoting sustainable travel.
- The development will be owned and operated by Circle VHA, a Housing Body (as per the application), and has lower car dependency and usage than traditional apartments. Under the management, car parking will not be an automatic entitlement with the apartments, but the spaces provided will be available to residents on a 'need basis'. The remainder of the parking will be allocated to residents mainly on a first-come first-served basis but will be dedicated and allocated to specific residents. Some parking spaces will then be available for visitors and normal parking spaces will similarly accommodate residential delivery vans. The allocation of car parking spaces will be reviewed/renewed on an annual/ongoing basis to suit demand. We refer to the letters from Circle VHA CLG in relation to carparking and a travel plan.
- A car parking management regime will be implemented which will control & manage access to the car parking bays, thereby actively ensuring the availability of onsite car parking for each of the following user profiles: Residents, Crèche drop-off & pick-up and Visitors to the site
- The access road provides access to a total of 70 parking spaces, and as such it is very lightly trafficked. The 6m wide section referenced in the DCC transportation report is just 17m in length (ie 3 car lengths), narrowing significantly internally beyond this point to provide natural horizontal traffic calming. The first 6m wide section has been so designed to ensure that the 4 no. surface parking spaces to the front of the site are accessible, avoiding unnecessary shunting when accessing the spaces.
- The Auto Track has been checked and a refuse lorry can clearly avoid the façade at 1st floor level. This is clearly illustrated in the revised annotated TRACK drawings included as Appendix A of the NRB Transportation report.
- The parking spaces on Somerville Avenue are demarcated as 'Assigned Spaces for Residents' as illustrated on the drawings included as Appendix A. of the NRB report. Low Level signage will be provided for users and if deemed necessary bollards can also be provided if unauthorised car parking is taking place. . These will be managed as part of the development consistent with the internal parking management arrangements as set out in the NRB report.
- The 'temporary waste storage area' is intended to be immediately beside the entrance to the bin store, where the bin lorry stops. This is noted on drawings included as Appendix A. of the NRB report.
- A total of 76 cycle spaces are now provided within the public accessible areas including spaces within easy walking distance of the proposed crèche (refer to Architect Layout Plans) and provision is also made for two cargo bikes beside the creche and four cargo bike spaces within the private parking beneath the undercroft.

- The proposed double stack bike parking system is the standard proprietary system that has been approved and used throughout the city. The space provided meets the specification for the system.
- The details now proposed, including providing for pedestrian & cyclist permeability to St Agnes Road and Somerville Drive, are as illustrated on the Architects Layout Plans. The pedestrian gates provided will allow permeable access during daylight hours to allow local residents access through the site which is in private ownership. The gates will be locked outside these hours, which is a similar approach to how many public parks are managed throughout the City. Resident desire lines are provided throughout daylight hours similar to public parks where desire lines are available during daylight hours but not at night time. Residents will have 24hr fobbed access, similar to many apartment schemes.
- There is currently limited visibility or inter-visibility at the existing vehicular/pedestrian access leading to the car parking area at the front of Coruba, and there is limited (or no) advisory road markings or signage. The revised arrangement as illustrated in the extract from the layout plans included below has been reviewed, and it provides adequate inter-visibility between the car park and the pedestrian/cyclist access. It has been subject to the specialist Independent Road Safety Audit, and there were no issues or concerns arising.



**Figure 5.4 – Extract from Plans Showing Proposed Layout at Parking Area**

2. **Details of how it is proposed to tie-in / connect to the existing public footpath network along St. Agnes Road, including evidence of consent for any works required in this regard.**
  - We refer to the detailed drawings prepared which show the Site Layout and the interface with the public road.

- Other than works on the access across the public footpath, and the proposed public footpath at Somerville Drive there are no areas within the development that are to be offered for taking-in-charge.

**3. A detailed phasing plan, which should include the timing of works to Glebe House, a protected structure.**

We refer to the Preliminary Construction Management Plan prepared by Cora consulting engineers which sets out the construction sequencing for the proposed development.

The methodology and program will ultimately be decided by the contractor prior to the commencement of works. As part of this outline plan it is proposed the construction of each block use phased start times to allow for sufficient site access and excavation works.

An outline phasing sequence is identified on CORA drawings CORA-1968-C.030 & C.031. The preliminary construction sequencing is outlined below.

- Apartment Block A to the rear/South of the site is the furthest from the entrance on St. Agnes Road and is to be started first. Once foundations have been completed, the contractor will move to Apartment Block B to commence foundation work while works to the Block A superstructure begin.
- The above methodology will be repeated for Block B. The podium structure will not be completed until further into the project timeline. This allows for the area to be used for site traffic and material set down. Refer to CORA drawing C.030 & C.031 for site sequencing.
- Glebe House is to be refurbished and converted for residential use. The further two pavilion buildings will be constructed last as the area adjacent to Glebe House will be used for the site compound, site traffic and material set down. Refer to CORA drawing C.030 & C.031 for site sequencing.
- For the duration of the works, protective hoarding and fencing will be erected around Glebe House to provide protection.
- Exterior Civil and Ground Works progressing from rear of site to front Landscape and finishing works progressing from rear of site to front

It is anticipated the construction phase for the proposed development will take approximately 24 months. The main contractor will prepare a construction programme outlining in detail all construction items prior to commencement of the project.

**4. Detailed section drawings illustrating the relationship between the proposed development and adjoining residential properties.**

We refer to the architects drawings which set out in detail the relationship between the development site and adjoining residential properties.

**5. A report addressing the matters raised in the report of the Dublin City Council Drainage Division in their report dated 03/12/2021.**

*A revised Flood Risk Assessment (FRA) shall be submitted incorporating the 2no. flood risk assessments in one comprehensive FRA and shall also address the proposed living accommodation below ground level in the renovated Glebe House, demonstrating how this complies with the finished floor levels as recommended in the FRA.*

CORA Response: The flood risk assessment has been reduced to a single Site Specific Flood Risk Assessment report. Information has been included to address the flood risk to Glebe House on drawing SC.030 showing the predicted flood extents.

*Details shall be provided on how it is proposed to comply with the key surface water drainage design criteria listed under Section 16.3 of The Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.*

CORA Response: The CORA Water Services Report addresses the Surface Water Protection impact showing compliance with section 16.3 of the Greater Dublin Regional Code of Practice.

*Confirmation of proposed green roof coverage; minimal area proposed which is significantly reduced from the previous application and would not meet DCC Drainage division requirements.*

CORA Response: The green roof coverage has increased to 72%. This is set out in the CORA drawing C.004 which shows the extent of green roof coverage. It is proposed to install an extensive green roof substrate on the flat roof surfaces.

*Details of the investigations completed to confirm the feasibility of the proposed route and connection to the public surface water sewer. Surface water sewer design details including sections shall be submitted.*

CORA Response: Existing drainage records have been used to identify the local sewer infrastructure the layout is shown on CORA drawing C.001(P6). The surface water route has been designed to ensure no conflict with existing services. Section details are shown on the previously submitted CORA drawings C.020-C.024. Detail of proposed phasing of surface water drainage works. CORA Response: A section has been added to the CORA water services report (Section 5) outlining the proposed phasing of the surface water network. The internal drainage will be constructed as Block A and Block B progress from foundations to superstructure. The Attenuation tanks will be installed following completion of the superstructure and prior to the construction of the podium level. Once all superstructures are complete the soakaway to Glebe House and the remaining subsurface pipe network will be installed. It should be noted this phasing sequence is preliminary and will be finalized by the contractor prior to the works.

*Detail of proposed surface water infrastructure that is proposed for 'taking in charge', if any, shall be indicated on a layout.*

CORA response: There is no proposed surface water infrastructure to be taken in charge within the 'site boundary'. The proposed section of surface water pipe outside of the boundary to the Southwest of the site is to be taken in charge. All surface water infrastructure will be constructed in line with Dublin City Council Drainage Standards.

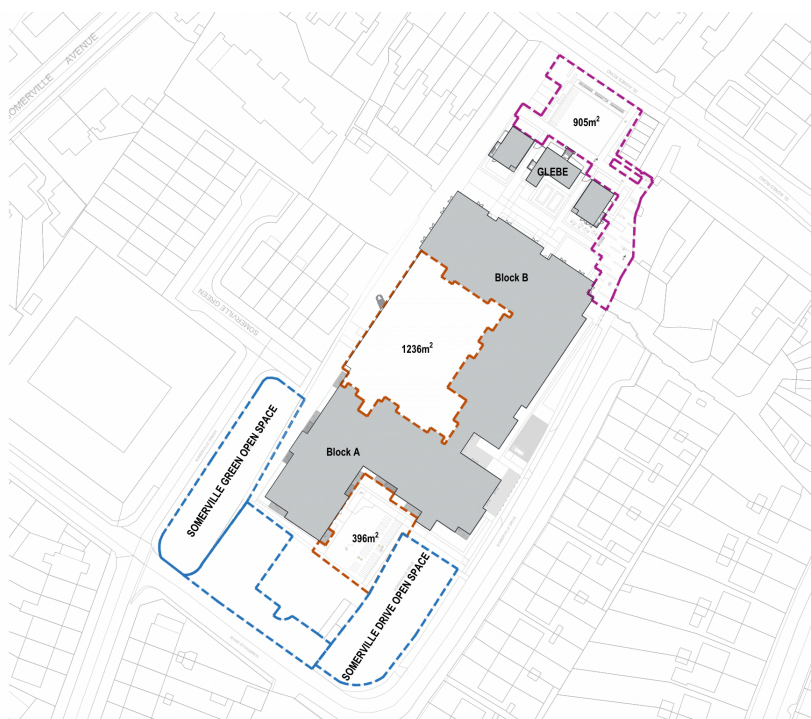
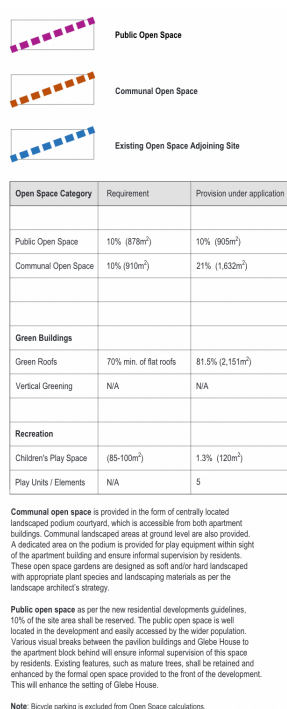
*Details of the proposed maintenance strategy for the attenuation storage shall be provided.*

CORA Response: Manhole access will be provided to each of the attenuation tanks. This will allow for flushing of silts or deposits that may build up over time. Separate Manholes with silt traps will be constructed up stream to each attenuation tank. Regular clearance of these will be included in the management and operation procedures for the development.

*Clarification if any of the public realm areas will be handed over to Dublin City Council for management. DCC drainage standards for areas to be taken in charge shall be applied in such circumstances.*

CORA Response: The proposed footpath on Somerville Drive is to be taken in charge. There are no other public realm areas in the development to be taken in charge. All surface water infrastructure will be constructed in line with Dublin City Council Drainage Standards.

## 6. Drawings identifying the extent of clearly defined public open space and communal and private residential amenity spaces, within the development and identifying those areas intended to be taken in charge by the Local Authority, if any.



Extract from Ait Landscape Report showing Communal and Public Open Space



We refer to the details of open space provision as set out in the Landscape Report prepared by Ait Urbanism and Landscape. The public open space calculation of 905sq.m excludes the areas within the open space where visitor cycle spaces are located. The communal open space is located at podium level and to the rear of Block A.

**7. A landscaping plan for the site, including proposals for the ground level communal open space to the north and east of Block A.**

We refer to the detailed landscape drawing prepared by Ait Urbanism and Landscape. The landscaping to the east is set out in the detailed Landscape Drawing. There is no landscaping proposed to the north of Block A, this area now forms part of the undercroft car park.

**8. Detailed proposals for the design and layout of the external amenity space serving the proposed childcare facility which should have regard to its relationship with the adjoining public open space / plaza and the adjoining pedestrian-cycle route. Proposals in this regard should be fully detailed and illustrated in the drawings and documentation provided.**

The crèche garden will be surfaced in artificial turf grass that will be enclosed by a 2.0m high timber fence and hedging. The crèche operator will provide play pieces within the garden. We refer to the detailed landscape plan which sets out information in relation to the public open space provision, the communal open space and the outdoor space provided for the Crèche.

**9. Detailed proposals for the design and management of the proposed pedestrian and cycle connection between Sommerville Avenue and St. Agnes Road.**

We refer to the landscape drawing and Architects ground floor plan setting out the location and design of the proposed pedestrian access from Somerville Drive. The gate will be accessible to the public during daylight hours and residents will have a fob system to access the gate outside these hours.

**10. A Building Lifecycle Report in accordance with section 6.13 of the Sustainable Urban Housing, Design Standards for New Apartments, Guidelines for Planning Authorities (2020) guidelines which should consider the external materials on all elevations. The report shall also have regard to the management and maintenance of public spaces and access routes to the development**

We refer to the Lifecycle report prepared by Reddy Architects.

**11. The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE '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 assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or quantified.**

**Daylight to Proposed Development**

A detailed report accompanies the application prepared by IES consulting. The report includes compensatory design solutions for the 5% of units which do not achieve the 2% Average Daylight Factor (ADF) levels.

Throughout the design process the design team have optimised the entire development to maximise the daylight within the proposed scheme. Initial testing was producing daylight results of 89% for the 2% ADF target. Optimisation solutions were tested which included the following:

- Increased window sizes to improve daylight provision to the apartments.

The introduction of the above design solutions improved the daylight to the scheme as a whole as anticipated producing final daylight results of 95% for the 2% 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 (Dec 2020). Note that larger floor areas make it more difficult to achieve the recommended daylight levels. However, larger windows have been incorporated into the design which also improves the view out for the building occupants.
- 59% of the apartment units are dual aspect which is above the 50% minimum requirement as required by the Design Standards (Dec 2020). As a result, more apartment units than the recommended minimum will achieve quality daylight from dual-aspect orientations.
- 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 some additional residential amenity.
- Furthermore, 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.

## **Daylight to Existing Buildings**

This study considers the Proposed Scheme and tests if the Vertical Sky Component of existing buildings 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.

## **Sunlight to Amenity Spaces**

The BRE Guide states that for a space to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least 2 hours of sunlight on March 21<sup>st</sup>. In the case of existing amenity spaces, if they are already below the 50% threshold then the BRE recommends the results kept to within 80% of the existing situation with the proposed development in place.

### **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 21<sup>st</sup>, thus complying with the recommendations in the BRE Guide as outlined above.

### **Proposed Amenity Spaces**

On March 21<sup>st</sup> 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."

- 12. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.**

The application is accompanied by a Planning Report and Statement of Consistency which sets out compliance with National, Regional and Local Planning Policy. The current Development Plan is the Dublin City Council 2016- 2022.

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

We refer to the Section 299B (1) statement prepared by Awn consultants.

Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the Board have identified the following authorities to be notified in the event of the making of an application arising from the notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:

- 1. Irish Water**
- 2. Transport Infrastructure Ireland.**
- 3. National Transport Authority**
- 4. Minister for Housing, Local Government and Heritage**
- 5. Heritage Council**
- 6. An Taisce — the National Trust for Ireland**
- 7. The Dublin City Child Care Committee**

## **Conclusion**

In conclusion, it is respectfully submitted that all the issues raised by An Bord Pleanála in their Opinion pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, have been comprehensively addressed.

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

This statement of response should be read in conjunction with the comprehensive documentation accompanying this SHD application. It is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area and is consistent with all relevant national, regional and local planning policies and guidelines. We therefore respectfully request the Board to issue a grant of permission for the proposed development.