

**Statement of Response to An Bord Pleanála in
respect of a Strategic Housing Development at the
former Europa Garage Site, Newtown Avenue,
Blackrock, Co Dublin**

On behalf of Seabren Developments Ltd

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1.0 Introduction

This *Statement of Response*, prepared by Doyle Kent Planning accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on the former Europa Garage site at Newtown Avenue, Blackrock.

A request under Section 5 to enter into formal pre-application consultation with An Bord Pleanála was submitted on 14th May 2020, following consultation with Dún Laoghaire-Rathdown County 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 30th September 2020.

An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-307181-20) on the 6th October 2020.

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."*

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

Notwithstanding that the proposal constitutes a reasonable basis for an application we were advised to address ten items to be submitted with an application.

The statement of response sets out the ten items to be included following the An Bord Pleanála's pre-application consultation opinion. This statement should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application.

2.0 Requested Specific Information

1(a) Provide additional drainage details. The details should address the matters raised in the Report of the Drainage Division of Dun Laoghaire Rathdown County Council, as contained in the PA's submission dated June 2020 and the matters raised in the submission received from Irish Water.

A Water Services and Flood Risk Assessment has been prepared by Cora Consulting engineers and is included with this application. It identifies and responds in details to the items raised by DLRCC Drainage Division and matters raised in the submission by Irish Water. The letter of response to DLRCC addresses all the issues raised and has been discussed with the Drainage Dept. We have set out below the issues raised and the response to each of the items in the Drainage Division Report.

1. Information relating to surface water discharge.

The details agreed with the drainage Department are included in Cora Consulting engineer Water Services Report Appendix G for updated calculations.

2. Water Services & Flood Risk information to be clearly set out to ensure accuracy and compatibility of engineering drawings reports with other disciplines' drawings, including landscape drawings.

The accompanying updated Water Services Report and CORA civil drawings provide the requested information and compatibility with the landscape drawings.

3. The applicant is required to alter their design to provide an online attenuation system.

The attenuation tank has been reviewed and updated to an online system. which has been designed to provide sufficient storage volume for a 1 in 100 year storm event.

The applicant is required to alter their design to prevent surface water runoff from the ground level entering the basement level car park.

Refer to CORA drawing CORA-1953-C.002. which sets out the details in relation to drainage to prevent surface water run-off entering the basement.

4. Submit a Site Investigation Report and results, including Infiltration tests, and a plan showing the trial pits/soakaway test locations across the site

Please refer to the site Investigation report from Site Investigations Limited which is appended to the Water services report prepared by Cora consulting engineers.

- 5. As standard, the applicant is required to submit long-sections of the surface water drainage system, clearly labelling cover levels, invert levels, pipe gradients and pipe diameters.*

Please refer to Cora consulting engineers drawing CORA-1953-C.008. Long sections of surface water drainage have been added to drawings.

- 6. Submit full details of the Green Roof system it is noted that the Green roof provision appears to be significantly less than the required 60% coverage. incorporated into the design.*

A detailed response to this issue is set out in the letter from Cora Consulting Engineers to DLRCC accompanying this application including a justification for the Green Roof provision proposed. In particular it is noted that the pitch of the proposed roofs in this particular case do not lend themselves to the installation of a green roof to the 60% stated in the development plan.

The areas of green roofs have been maximised in the design and can achieve an overall rate of 36%. It should be noted that the development not only reduces the rate of discharge from the site, but it also reduces the volume of surface water discharge from the site. The discharge rate would be circa 8.2% of the current arrangement.

The proposed design of the buildings on the site has been informed through discussions with the planning authority, and design team are of the firm opinion that the proposed pitch roof arrangement is the correct architectural response which addresses the site and surrounding buildings to deliver a very high quality development.

In conjunction with the green roof areas proposed, additional SuDs measures in the form of bioretention, permeable pavements and attenuation have all been adopted to filter, treat and ultimately discharge the surface water to the public combined sewer.

- 7. The applicant is required to submit details of flow control details and include provision of a silt trap and.*

A Penstock valve has been added to flow control device chamber. Sectional details on surface water manholes has been added to drawings, please refer to CORA drawings CORA-1953-C.003 & C.008.

8. *Submit supporting standard details that demonstrates that all proposed SuDS measures, i.e. permeable paving and green roofs, have been designed in accordance with the recommendations of CIRIA C753 (The SuDS manual).*

Details on surface water manholes, attenuation tank and permeable paving have been added to drawings, please refer to CORA drawings CORA-1953-C.004 and C.010 to C.013.

9. *The applicant is required to provide fully dimensioned plans and sections of the attenuation storage system.*

Sectional details of surface water manholes/attenuation tank have been added to drawings, Please refer to CORA drawing CORA-1953-C.008.

10. *The applicant is required to submit utility details and where applicable in accordance with Codes of Practice.*

Details are set out in Cora Consulting Engineers letter of response in relation to utility details.

11. *The applicant is required to show the options being proposed for interception and treatment with contributing areas on a drawing together with an accompanying text and tabular submission showing the calculations, to demonstrate that the entire site is in compliance with GSDS requirement.*

Calculations have been provided in the CORA water services report identifying interception and treatment volumes in line with GSDS requirements to be read in conjunction with CORA drawings C.004 & C.009.

12. *Submit details of any proposed SuDS measures that incorporate the use of infiltration including details of each SuDS measure.*

Initial site investigation determined the site unsuitable for large scale infiltration through the use of soakaways. As such attenuation and green roofs have been proposed to meet SuDS requirements. The attenuation tank is proposed to be impermeable as minimum separation distances cannot be met for infiltration.

13. *A Stormwater Audit will be required for the application which shall be forwarded to DLRCC prior to lodging the planning application.*

JBA Consulting have completed a stormwater audit which has been issued to DLRCC. Recommendations from the stormwater audit have been incorporated into the Water Services report and associated drawings prepared by Cora Consulting.

14. *Flood Risk Assessment- The applicant is requested to comment on the proposed surface water drainage system in the event of blockage or partial blockage of the system, commenting on any surcharging or flood risk that may be identified. The applicant is requested to submit a drawing identifying and showing details of safe overland flow routes both within and without the site. The overland flow route plan should identify drop kerbs or ramps required for channelling the flow, should address low point areas in the site and should detail how properties, both within the development and on adjacent lands, will be protected in the event of excessive overland flows.'*

The proposed surface water network on site has been reviewed to ensure the properties within the site and adjoining sites will not flood for a storm event coinciding with a blockage of the surface network. Overland Flow Routes have been indicated on CORA drawing CORA-1953-C.015

1 (b) – Details of Part V provision. The details should address the matters raised in the Report of the Housing Division of Dun Laoghaire Rathdown County Council, as contained in the PA's submission dated March 2020

We have contacted the housing department in respect to item 1(b) and have concluded with the housing department that there is no action required from the applicant at this time. The nature of the Part V process is such that detailed negotiations pertaining to Part V cannot be entered into until there is a granted permission in place, one reason being the Development Use Value cannot be calculated until a permission is obtained.

In support of this the housing department have issued a letter dated 03rd November 2020 confirming that the proposal *'is capable of complying with the requirements of Part V of the Planning and Development Act, 2000, as amended, and of the County Development Plan and Housing Strategy', and "should planning permission be granted, the Council may seek a revision of the Part V proposal following evaluation of costs and land values, a review of current housing demand and determination of funding availability'*.

The applicant undertakes to begin negotiation of Part V provision with DLRCC once a granted permission is obtained for the proposed development, and in accordance with any such conditions of such permission.

A Part V Booklet with accompanying plans, indicative costs and letter of acceptance is included with this submission.

2 . CGIs of primary elevations to public roads and communal open spaces within the site including the northern and eastern elevations to Newtown Avenue.

CGIs and Verified Views have been included with the application documentation together with a Visual Impact Assessment which has been prepared by AIT Landscape Architects. All Verified Views have been updated to reflect changes made since the Pre-App with ABP and additional CGI's have been included showing the central communal space and the northern and eastern elevations to Newtown Avenue.

3 . A Materials Strategy that details all materials proposed for buildings, open spaces, paved areas and boundaries. This strategy shall include details of the colour, tone and texture of materials on each block. The statement should present a justification for the materials having regard to the need for high quality and sustainable finishes that respond to the character of the area.

A materials strategy is provided in section 4.14 of the Design Statement prepared by Metropolitan workshop together with an external building fabric schedule provided in the Building Life Cycle Report. Details of hard landscape, materials and finishes are included in section 3.0 of the Landscape Report prepared by Áit Urbanism and Landscape.

The design team in finalising the materials chosen for the project have were keen to ensure that the materials are related to those already present in the existing context so that the scheme sits comfortably within the receiving environment.

For the exterior walls a buff coloured brick is proposed to block A and the lower portion of block B which is reflective of the existing brick colour to the Newtown Villas buildings to the west of the site. The taller element of block B is considered as a continuation of Seapoint Avenue where lighter materials are generally used. To this end, a warm grey brick is proposed for the corner pavilion which will pick up on the natural coloured renders found in the area. It also presents a lighter building to the corner of Newtown Avenue. We are also proposing using a blue glazed header to give accents and brightness to the corner element. Rough cast render, another material commonly found in Blackrock, is used to articulate key features on the facade.

Metal roofs are proposed for the curved elements of Block A and the pitched roofs of Block B. A dark grey zinc for the lower pitched roof elements on Block B will pick up tones of the existing slate tile roofs prevalent along Newtown Avenue. A red/brown zinc roof is proposed for the taller element of block B and the curved elements on Block A backing on to Newtown Villas which will complement the buff brick tones and also pick up on the brown tones of the clay roof tiles in the area.

The balcony panels, balustrades and window grills will be powder coated steel (or aluminium for flashings etc) colour matched to the red/brown zinc roofs.

The approach to materiality as set out above was arrived at in response to feedback received at the second pre- planning meeting about the appropriateness of the red brick on the corner. A detailed response to materials was issued to DLRCC Architects and Planning Department for feedback in advance of the palettes of materials being finalised.

4. A landscaping plan that addresses the design and function of open spaces within the development. The plan should address issues raised in the Report of the Parks Department of Dun Laoghaire Rathdown County Council, as contained in the PA's submission dated March 2020.

A Landscape Report has been prepared by Áit Urbanism and Landscape and is included with the application. The report identifies and responds in detail at Section 2.2 to the items raised by DLRCC Parks department.

An Arboriculture Report prepared by Tree Surveys Ltd is also included with the application which justifies the replacement of the existing sycamore tree to the north of the site. The replacement tree sits within a planter at the centre of a new public space to the north of the site.

The landscape design of the central communal space has been reconsidered since the Pre- app discussions with the planning authority as further investigation revealed it was possible to remove the requirement for large vehicle access to the central courtyard. This allowed for the introduction of more soft landscaping improving the residential amenity for the future residents.

The report contains illustrative cross sections and vignette views of open spaces & open space elements. The landscape report also contains proposed boundary details and information on lighting proposals. The soft landscape section contained within the landscape report presents information on the proposed tree, shrub & herbaceous/ grasses planting. Planting mixes are proposed with native and non-native, pollinator friendly species. Later sections within the report contain an outline Landscape Specification and Maintenance Schedule for the proposed development.

5. A Housing Quality Assessment that sets out a schedule of accommodation, with the calculations and tables required to demonstrate compliance of the various requirements of the 2018 Guidelines on Design Standards for New Apartments.

A housing quality assessment (HQA) which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments has been provided as

part of this appendices of this design statement. The HQA also demonstrates how the apartments comply with the requirement of the Guidelines.

6. Details of cycle parking provision to include design details for secure cycle storage areas and visitor cycle parking spaces.

Details of cycle parking provision are included in the Transportation Assessment Report prepared by NRB as part of this application. There are 194 secure bicycle spaces provided at basement level and 50 visitor spaces provided at grade.

7. A Building Life Cycle Report that includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2018 Guidelines on Design Standards for New Apartments .

A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines accompanies the application. This document includes an assessment of the long-term running and maintenance costs on a per residential unit basis and measures considered to effectively manage and reduce costs to the benefit of residents, including materials, design principles, landscape, waste management, health and well-being, management, and transportation.

8. An operational waste management plan containing details for the management of waste within the development, including the provision of facilities for the storage, separation and collection of the waste.

An operational waste management plan prepared by AWN is included as part of the application. The 'Operational Waste Management Plan' outlines the proposed strategy for waste management once the development is occupied. This Strategy aims to demonstrate how the proposed development will utilise sustainable methods for waste and recycling management for the operational phase of the scheme. The proposed plan provides for a convenient, clean and efficient waste management strategy that will enhance the operation of the proposed development and promote recycling.

9. Taking in charge layout.

There is no area of this site to be taken in charge. We have therefore not included a taking in charge layout with this application.

10. Details of public lighting.

A Lighting Plan has been prepared by Dynamic Design Consulting Engineers/ DIALux. The comments from the Public Lighting division of the planning authority have been taken into consideration in the preparation

of this plan. The lighting layout has also been designed to ensure any environmental concerns are addressed in full.

3.0 Notification of Authorities

The Board requested that, pursuant to Article 285(5) (a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the following authorities should be notified in the event of the making of an application arising from their notification in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The following list of bodies identified by the Board have all been notified of this planning application and copies of the relevant correspondence to them are included under separate cover as part of this application to the Board:

- Irish Water
- National Transport Authority
- Minister for Culture, Heritage and the Gaeltacht
- Heritage Council
- An Taisce – the National Trust for Ireland
- Dún Laoghaire-Rathdown County Childcare Committee

4.0 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.

