

# Statement of Response to ABP's Opinion

*In respect of*

**Proposed Mixed Use Development at The Former CIE Lands, 2-4  
Carnlough Road, Cabra, Dublin 7**

*Prepared by*

**John Spain Associates**

*On behalf of*

**Seven Cabra Real Estate Limited**

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## **1.0 INTRODUCTION**

- 1.1 This document has been prepared in response to the pre-application consultation opinion issued by An Bord Pleanála in relation to the proposed strategic housing development at the former CIE lands, 2-4 Carnlough Road, Cabra, Dublin 7 which was received on 9<sup>th</sup> October 2019.
- 1.2 Having regard to the above, the opinion states that An Bord Pleanála *‘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’*.
- 1.3 In this regard it is considered that the proposed development as submitted is sufficient to proceed to planning application stage. Notwithstanding the reasonable basis to make an application, 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.*
- 1.4 The specific information listed in the opinion is summarised as follows:
- Further information regarding the extent of residential amenity provided within the development having regard to the tenure of development as build to sell apartments.
  - Further consideration in relation to the provision of east facing single aspect units.
  - Preparation of School Demand and Concentration Report
  - Schedule of Floor Area
  - Detailed Phasing Plan
  - Detailed Landscaping Plan
  - Site Specific Construction and Demolition Waste Management Plan
  - Further information in relation to surface water management
  - Additional details in relation to traffic and transport
  - Waste Management Plan
  - Information regarding screening of the development for EIAR
- 1.5 A detailed response to each of the points raised above has been provided within this response report and has been included as part of the planning application documentation.

## **2.0 STATEMENT OF RESPONSE TO SPECIFIC INFORMATION REQUIRED**

- 2.1 The following sets out how the applicant has addressed the Board’s request for additional specific information in respect of the proposed development.

**Item No.1 (a) – The perspective applicant is requested to undertake further consideration and / or justification of the documents as they relate to the extent of resident amenity facilities proposed, in light of the fact that the proposal is not being advertised as a built – to – rent scheme. This justification should include, inter alia, details relating their uses / functionality; their long term operation / management and maintenance costs as they would apply on a per residential unit basis at the time of making the application, together with information to demonstrate what measures have been specifically considered by the prospective applicant to**

**effectively manage and reduce costs for the benefit of residents, so as to ensure that the extent of these uses will not become onerous on residents of the scheme into the future. In this regard, a building life cycle report should be submitted in accordance with section 6.3 of the Sustainable Urban Housing; Design Standards for New Apartments (2019).**

- 2.2 The proposed development is submitted as a standard apartment development and therefore is compliant with the SPPR's as set out in the Apartment Guidelines as they relate to standards apartment units. The proposed development is not reliant on any reduced standards as part of this application and meets or exceeds all of the relevant quantum as set out in the HQA prepared by Plus Architecture.
- 2.3 The proposed development seeks to provide for amenity space to serve the future residents on site both internally and externally within the development. Based on the Apartment Guidelines communal open space should be provided as 4 sq.m. for studios, 5 sq.m. for 1 beds, 7 sq.m. for 2 beds and 9 sq.m. for 3 bed units. Having regard to the unit mix breakdown, the total requirement for communal open space is 3,003 sq.m. to serve the proposed 484 no. apartment units.
- 2.4 The proposed development seeks to provide for 3,585 sq.m. of external open space in the form of shared courtyards and 1,763.9 sq.m. of internal communal space within the blocks and at roof level. The external space provided has not changed from the permitted on site, therefore no increase has been provided in this regard.
- 2.5 The previously permitted development provided for 441.8 sq.m. internal communal amenity space, this is proposed to increase to 1,763.9 sq.m., resulting in an additional 1,322 sq.m. of communal amenity space within the development. The proposed increase in amenity space has been as a result of current market trends and requirements of tenants in similarly sized schemes internationally. It is becoming more and more frequent that services such as meeting rooms, co-working spaces, function rooms, cinemas, gyms and resident lounges are being provided within standard residential developments, providing for a sense of community to these new residential apartment schemes. It provides for a high level of amenity for future occupants. The details of the use and functionality of these spaces are set out in the Design statement prepared by Plus Architecture and the Operational Management Plan prepared by Aramark.
- 2.6 Other build to sell residential developments within the Dublin City area which also provide for this model of development with residential amenity facilities include, Marianella, Rathgar, Capital Dock – Sir John Rogerson's Quay, Clancy Quay – South Circular Road, St. Clare's – Harolds Cross and Carriglea – Naas Road, Clayfarm – Ballyogan Road and Spencer Dock, Block 2 – Dublin 1. It is clear therefore that standard residential developments (as opposed to "Build to Rent") are increasingly providing for residential amenity facilities within the development to serve the future occupants. The provision of additional residential amenity proposed is therefore considered to be in line with current market trends and demands for residential development.
- 2.7 The proposed development provides for 485 no. residential units, and therefore provides for a significant increase in the population of the area thus requiring additional facilities to serve this new residential area. The scale of development proposed would typically be accompanied by a number of ancillary services such as commercial premises, shops, restaurants, leisure facilities, offices etc. The proposed development seeks to provide for the future residents in this regard, providing for co-working spaces, cinema rooms, lounge

area, meeting rooms, gyms and bbq food and beverage areas which are considered to satisfy the requirements for the future residents of this proposed development which would typically be provided off site. This provides for a significant benefit to the scheme with high quality amenities and services being provided on site, thus reducing the need for travel and providing for a self-sustainable community within the proposed new development.

- 2.8 It is considered that the level of residential amenity provided within the scheme is appropriate to serve the new population created by the proposed development and the surrounding existing population. The additional resident amenities such as gyms and function rooms within the development itself, provide for enhanced quality of life and services at the doorstep of the future residents which are included within the management cost of the development. Therefore, the proposed residential amenity spaces provided will reduce the typical day to day costs which would typically be incurred by residents for services such as co-working spaces, cinemas and gyms. It is considered therefore that the cost of such facilities would not be considered onerous to the residents but would be welcomed as additional and enhanced facilities on the site.
- 2.9 A life cycle report has been prepared by Aramark and is submitted with this application. The life cycle report sets out how the proposed development will be designed and managed as to avoid significant maintenance costs. The life cycle report specifically sets out the considerations to effectively manage and reduce costs so as to ensure the extent of such costs will not become onerous on the residents of the scheme in the future. The choice of high quality and long-lasting materials such as brickwork, render and metal cladding and hardscape in the public realm will contribute to lower maintenance costs for future residents and occupiers.
- 2.10 In addition, an operational management plan has been prepared by Aramark to accompany the planning application. The operational management plan sets out the tenant amenity consideration and management for the scheme. The operational management plan states that the provision of tenant amenities is not considered to be a major factor in increasing service charge costs per units as they are relatively inexpensive to operate once the cap-ex and initial investment has been borne by the developer. To accompany the operational management plan, a service charge budget has been prepared which sets out the annual total cost per unit. The service charge is estimated to be in the range of €744 for studios, €992 for 1 beds, €1,985 for 2 beds and €2,978 for 3 bed units per annum. This level of service charge would be consistent with standard apartment schemes and therefore is considered to be acceptable thereby not representing an onerous cost to the residents in the future.

**Item No.1(b) – The prospective applicant is requested to undertake further consideration and / or justification of the documents as they relate to the percentage of east facing, single aspect units overlooking a railway line and the extent of amenity being proposed to same. Drawings and / or other information, as considered necessary, should be submitted which clearly demarcates the aspect of each unit for example, single, dual or triple aspect. The prospective applicant is also requested to address the concerns raised in the pre-application consultation meeting regarding the daylight/ sunlight standards being achieved, given the brownfield nature of the site and its limited constraints.**

**The further consideration of these issues may require an amendment to the documents and / or design proposal submitted. The prospective applicant is advised to note that the standards set out in the relevant section 28 guidelines are**

**minimum standards and that the spirit of the guidelines is to provide for good quality urban development.**

- 2.11 The number of single aspect east facing units have been reduced as part of the application from that presented at pre-application stage. The internal layout and unit typologies within Blocks D and F along the eastern boundary of the development with the railway line, have been revised to include a duplex type unit. The provision of a duplex unit has enabled the number of dual aspect units to be increased leaving only 8 no. single aspect units along this boundary per floor (previously 15 no. per floor at pre application stage). The overall development has therefore been increased to 53.7% dual aspect units provided.
- 2.12 Plus Architecture have prepared an Architectural Design Statement to accompany this application. The design statement includes 3D images of a cross section of Blocks D and F. The 3D image clearly demonstrates how the proposed duplex and east facing units relate to the railway line. It is clear from the image that the existing railway line will not create a significant impact on the quality of amenity obtained within these east facing units. The proposed railway line is approximately 26 m away from the blocks and is significantly lower in level than the residential units. Given the proposed boundary treatment it is unlikely that any of the units proposed will be burdened with a view of the railway line in his regard.
- 2.13 In addition, a noise report has been prepared by AWN consulting and is submitted with this application. The noise report states that the noise generated from the rail line would not impact on the residential amenity of the proposed units along the eastern boundary. In addition, design features have been included to mitigate against any potential noise impacts.
- 2.14 A more detailed daylight /sunlight report has also been prepared by OCSC to assess the daylight / sunlight access to the proposed units internally. A variety of rooms at ground and first floor within all blocks have been tested against the BRE recommendations for Daylight / Sunlight levels in residential developments. The report assesses on a room by room basis as opposed to overall levels per unit, and concludes that out of a total of 1,292 rooms within the development only 49 no. rooms are marginally below the recommended standard achieving a 96% compliance rate in total. The high pass rate and increase in this figure from the previously approved permission on the site is considered to be an acceptable design solution for the development. It should also be noted that out of the rooms that do not meet that standard, the majority of these rooms contain a balcony which, due to the location of the balcony on the façade reduces the quantitative measurement however, in reality would still provide for adequately lit rooms.
- 2.15 It should also be noted that all of the rooms tested on the eastern boundary within Blocks D and F as highlighted by An Bord Pleanála meet or exceed the recommended standard as set out in the BRE Guidelines. The level of amenity therefore obtained in these units is considered to be appropriate notwithstanding the east facing aspect towards the railway line.

**Item No. 2- - School Demand and Concentration Report, which identifies demand for school places likely to be generated by the proposal and the capacity for existing schools in the vicinity to cater for such demand.**

- 2.16 A School Demand and Concentration Report has been prepared by John Spain Associates which highlights the schools in the area and the current enrolment in each of

these schools. Having regard to the population data from the 2016 Census, and the availability in the area, it is considered that there is sufficient capacity in the area to cater for the proposed development.

**Item No. 3- A schedule of floor areas for all proposed units.**

- 2.17 Plus Architecture have prepared a floor areas schedule for all of the proposed units and is submitted with this planning application.

**Item No. 4 – A detailed phasing plan for the proposed development.**

- 2.18 A detailed phasing plan has been prepared by Walls and is submitted in accordance with the construction management plan for the development. It is proposed to provide for 1 single phase of development on the site.

**Item No. 5 – A detailed landscaping plan for the site which clearly differentiates between areas of public, communal and private open space and which details exact figures for same. Details should also include proposals for hard and soft landscaping including street furniture, where proposed, which ensures that areas of open space are accessible, usable and available for all. Pedestrian permeability through the site should be outlined. Additional cross sections, CGIs and visualisations should be included in this regard.**

- 2.19 Plus Architecture have prepared a detailed landscaping plan which sets out the communal and public and private open space areas. The details of the materials proposed for the hard and soft landscaping are also set out within the landscape package submitted with the application. The proposed landscape strategy also includes details of the boundary treatments, cross sections through the development and visualisation drawings of the main landscaping features within the development.

**Item No. 6 – Site Specific Construction and Demolition Waste Management Plan.**

- 2.20 A site Specific Construction and Demolition Waste Management Plan has been prepared by Walls and is submitted with this application.

**Item No. 7 – Additional details in relation to surface water management for the site, having regard to the requirements of the Drainage Division (undated report) as indicated in the Planning Authority’s Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk.**

- 2.21 A Site Specific Flood Risk Assessment has been prepared by OCSC and is submitted with this application. In addition the Engineering Site Services report has been updated to reflect the planning authority’s requirements in relation to surface water and foul water network.

**Item No. 8 – Additional details in relation to traffic and transport matters, having regard to the requirements of the Transportation Planning Division (report dated 02/09/2019) as indicated in the Planning Authority’s Opinion.**

- 2.22 A Traffic and Transport plan has been prepared by OCSC and is submitted with this application. The assessment addresses all of the requirements as set out by Dublin City Council and provides details of the road improvements in the area.

**Item No. 9- Waste Management Plan**

- 2.23 A Waste Management Plan has been prepared by AWN Consulting and is submitted with the planning application.

**Item No. 10 – Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, submitted as a standalone document.**

- 2.24 An Environmental Screening Statement has been prepared by John Spain Associates which sets out the requirements for EIAR and the demonstrates that the proposed development is below the relevant threshold for the preparation of the EIAR. The report also addresses Schedule 7 and 7A in relation to Screening and concludes that the proposed development is screened out for the requirement of EIAR.

**3.0 CONCLUSION**

- 3.1 This document outlines how the specific information items requested in the pre-application consultation opinion from An Bord Pleanála in relation to a proposed mixed use development at the former CIE Lands, 2-4 Carnlough Road, Cabra, Dublin 7 have been addressed in full by the applicant and design team prior to lodgement of the application to ABP.
- 3.2 The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 3.3 The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall proposed development and ensure that a high-quality scheme is presented to the Board for approval.
- 3.4 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.



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John Spain Associates