



Cllr. Naoise O Muiri
City Hall, Dame Street
Dublin 2

Date: 25 September, 2015

Register Reference: F15A/0362

Development: Site of c4.4 ha comprising the former Techrete and Teeling Motor Company sites, Baltray Park and the pumping station/maintenance depot site. Development will comprise the following: Demolition of existing industrial/commercial buildings (c8,162 sq.m gross floor area (GFA)). Construction of a mixed -use development as follows: 200 no. residential units comprising 145 no. apartments within 5 no. blocks (18 no. 1-bed units; 106 no. 2-bed units; and 21 no. 3-bed units, ranging in size from c.55 sq.m to c.170 sq.m). 51 no. 3-4 bed houses ranging in size from c.180 sq.m to c.258 sq.m 4 no. houses for the traveller community each c.117 sq.m 6 no. commercial units (retail, restaurants/cafes, gym) ranging in size from c. 65 sq.m to c.615 sq.m (with optional subdivisions) and creche (c.227 sq.m.). Community Centre (c.1,878 sq.m) comprising a sports hall, changing rooms, meeting rooms, coffee shop, gym/studio, creche, ancillary areas and outdoor sports facilities. Building heights range from 1 to 6 storeys (plus mezzanine). 487 no. car parking spaces of which 390 are basement/undercroft spaces. 332 no. bicycle spaces. 5 no. vehicular entrances. 2 no. ESB substations and 1 no. Bord Gais DRI (c.39.2 sq.m in total) A range of public and semi-public open spaces including a public park, public plaza, residential courtyards and public pedestrian/cyclist routes. De-culverting of the "Bloody Stream" through the site with new riparian strip. All associated site development services provision, landscaping and boundary treatment works. Total GFA of the proposed development is c.34,500 sq.m with c.13,706 sq.m of basement/undercroft area. An EIS (Environmental Impact Statement) and NIS (Natura Impact Statement) will be submitted to the planning authority with the application.

Location: Howth Road, Howth, Co. Dublin

Applicant: Glenkerrin Homes (In Receivership)

Reg. Ref. F15A/0362

Application Type: Permission

Date Received: 4 August, 2015

Dear Sir/Madam,

With reference to the above, **Additional Information** was requested from the Agent/Applicant in relation to this application on 24-Sep-2015. Details of this Additional Information are attached for your information.

You will be notified when a response to the request for Additional Information is received by the Planning Authority.

Yours faithfully,

Erin Lynch

for **Senior Executive Officer**

Details of Additional Information sought

LOCATION: Howth Road, Howth, Co. Dublin

1. It is noted that 1:500 site layout plan submitted under F11A/0028 does not measure accurately against the 1:500 site layout plan submitted with this planning application, e.g. the depth of the site on the current submitted site plan is 125m along the mid-section of the site north-south taken opposite the junction of Howth Castle, while on the other site plan the same distance measures 121m. The Applicant is requested to clarify the inaccuracy between the 2 plans and indicate if the site layout plan as submitted with the current application is accurate.
2. The overall height of Blocks 1, 2 and 3 results in a visually obtrusive development. It is noted that the overall height of these blocks has increased on that permitted under F11A/0028, with one element stated as high as 29.4m. The applicant is requested to reduce the overall height of the proposed blocks 1 & 2 in order to mitigate its visual impact and also to accord with Local Objective 512, while also maintaining a residential density appropriate for this strategically located site adjoining Howth DART station.
3. The proposed drawings indicate a substantial increase in retail/commercial development over the current permission. The Planning Authority has concerns at the viability of the retail element of the proposal at this location and in particular how it accords with Objective HOWTH 2 in the Fingal Development Plan 2011-2017. The applicant is therefore requested to justify the level of retail development at this location. The applicant is also requested to clarify the proposed use type and size of the units – optional amalgamation of all units is not considered acceptable as it would require a different assessment.
4. The applicant is requested to confirm that the proposed dual frontage to the retail units is considered feasible from a commercial point of view. In the event that it is not, the treatment of this elevation to the cycle path and footpath will be even more critical to avoid a narrow tunnelling effect. Full details of the active frontage currently proposed or any alternatives to the northern elevation of the retail units should be provided as part of Additional Information.
5. With regard to building lines, block 4 steps forward of the other blocks along the Howth Road. The proposed block 4 (5 storeys) is at its closest point approx. 4.6m from the roadside edge. The positioning of terrace 5 is similarly of concern, being 6.8m from the roadside edge. The applicant is requested to consider the positioning of block 4 and terrace 5 given the potential for this block to be overbearing on this entrance/exit to Howth village.

6. The applicant is requested to submit additional images of the proposed development to assist in the visual assessment of the site, with regard to the proposed building line, potential impact on architectural heritage and impact on the entrance to Howth. The applicant is requested to submit the following photomontages:
 - View from street level as one travels along the Howth Road approaching Howth village mid-way along Terrace 5, indicating block 4.
 - View from street level as one travels away from Howth Village Howth indicating blocks 1, 2 and 4.
 - View from the road between Adros (No. 61) Howth Road and The Rectory (No. 94) Howth Road close to the entry to Baltray Park.
 - View from Muck Rock (elevated site above the Deerpark golf course)
 - View from the gates of Howth Castle - view 4 is not sufficient as it is at a point some distance back from the gates. The view should be assessed from the gates. It would appear that the height of the houses at 13.8m will have an increased impact to the height previously permitted at this location, which was approx. 11.4m when measured from cross section B-B of F11A/0028 (drawing 10.018-PL-1.202). In addition the position of the dwellings on site relative to what was previously permitted is uncertain given the discrepancy noted in the drawings as discussed under point 1 above.
 - Photomontage 20, on the main view of the scheme leaving Howth, shows the east elevation of Block 1 with a large element of mirror glass on an unrelieved plane lighting an access corridor. The applicant is requested to consider a better articulation of this elevation.

Views should ensure that deciduous foliage is not shown to reflect the full impact of the development.
7. The applicant is requested to submit a daylight and shadow analysis in accordance with Objective RD13 of the Fingal Development Plan 2011-2017, 'Ensure all new residential units comply with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R.E. 1991) and B.S. 8206 Lighting for Buildings, Part 2 2008: Code of Practice for Daylighting or other updated relevant documents'. The Guidelines differentiate between sunlight/shadow to amenity open spaces, sunlight to windows of buildings and daylight to rooms in buildings. This analysis should address in particular the impacts of the proposed apartment blocks on each other and on neighbouring developments (east and west of the development); the average daylight factor for a number of units within the apartment development (the location of these units to be identified and agreed prior to testing); and impact of any overshadowing on the value of the semi-private courtyard areas between blocks 3 & 4 for residential amenity.

8. The separation distances between blocks 3 and 4 are 16m-23.6m. In terms of privacy/overlooking, the proposed separation distances between blocks 3 and 4 are of concern, with the distance of 16m considered insufficient.
9. Certain balconies serving apartments across the 3 blocks are exposed in terms of overlooking, e.g. apartment 1, 2, 3 & 4 in block 1 adjoining the stairs from ground level up to plaza; blocks 3 & 2 have opposing balconies/living rooms 10m-12m apart; all apartments where there are adjoining balconies. It is unclear what screening is proposed to offer privacy/shelter to the occupants and to protect neighbouring properties from overlooking. In accordance with Objective OS42 of the Fingal Development Plan 2011-2017, the applicant is requested to address the satisfactory amenity and privacy for residents, including full details of the materials to be used to construct any screenings to serve the balconies and terraces including materials, colour, heights etc.
10. The applicant is requested to submit further details of the public plaza to allow for a full assessment of its functionality, landscaping and aesthetic quality. In particular, there is no/limited soft landscaping proposed for the public plaza with no public seating outside that indicated for commercial use, thus minimising the potential of this south facing plaza. The applicant is requested to submit a revised upper ground floor plan focussing on the plaza area, and to consider further soft landscaping and street furniture in relation to both the ground level and upper level public plaza. The applicant is requested to clarify the colour scheme and materials proposed for the plaza area. In addition, it is unclear what the ground floor finish to the western elevation of unit 2 is proposed to be. On the visuals it appears to be glazing but on the plans it appears as a solid elevation. On the upper ground plan, there is a wall at the top of the steps on the western side of the plaza, details of design and treatment are unclear; the retail units on the north elevation at the ground level where the steps are located are proposed to comprise a solid finish, the material of which is unclear.
11. The proposed colour palette for the scheme has white brick and white mortar walls to the terraced houses and white precast concrete panels to the walls of the apartment blocks. The Planning Authority is concerned that the colour choice will make the proposed terraces stand out starkly against the background environment and increase their visual impact. The coastal location means that the development would be very exposed to the elements and it is considered that it would be difficult to detail sheltered elevations so that staining does not occur in the future. The applicant is requested to address this issue.
12. The applicant is requested to address the following issues in relation to the proposed housing:
 - a. The mansard roof profile is considered to be out of character with the rest of the scheme

with the inner face of the terraces particularly unresolved. The scale and height of the mock chimneys are also of concern in relation to the mansard roofs. The applicant is requested to address this issue and could consider a flat roof similar to the rest of the scheme.

b. It is noted that Terrace 6 is described as comprising 3 bed dwellings, however having considered the internal layout, which is similar in design to the 4 bed dwelling, these dwellings are considered as 4 bed units for the purposes of private amenity space calculations, in accordance with Objective OS38 of the Fingal Development Plan 2011-2017, a minimum of 75 sqm is required per dwelling within this terrace. The applicant is requested to address compliance with Objective OS38 in relation to these residential units.

13. The applicant is requested to clarify the following issues in relation to public open space and to consult with the Parks & Green Infrastructure Division of the Council prior to making a submission:

a. The applicant states that 1.4138 hectares of open space (denoted as Areas A-G on drawing no. 14-012-PL-1.110) is being provided in association with this development. However, as set out in the Planning Officer's report, not all these areas are considered Public Open Space. In order to clarify the provision and ownership of Public Open Space associated with the above development the applicant is requested to clearly outline the Class 1 and Class 2 open space provision.

b. The applicant is requested to submit a revised taking in charge plan, following further consultation with the Parks Division of the Council.

c. Based on the number of units proposed, there is a requirement for a playground of 800 m². It is not clear from the drawings how the applicant will meet the requirements of Objective OS26.

d. There are a number of mature trees and hedgerows on the proposed development site. Considering the significance of the location of this site and the impact that development works will have on the existing vegetation, the following should be submitted: A full tree and hedgerow survey, Site Constraints Plan, and Arboricultural Impact Assessment and Arboricultural Method Statement in accordance with BS 5837 (2012).

e. The developer is requested to provide details for additional screen planting along the western edge of the site.

f. The constructed tree pit detail for street trees is acceptable. The applicant should state how the construction of these tree pits will be achieved if underground services already exist, in particular along the Howth Road. In addition, the applicant should clearly state in the proposed landscape plan that no trees shall be planted within 7 metres of a lamp standard and 3 metres of underground services.

- g. Details should be provided on the inlet and outlet points of the riparian corridor as well as gradients, in particular in relation to child safety. In particular the 1:2 slope on the eastern side of the riparian strip is considered steep and should be re-contoured for safety, to facilitate wetland planting and for ease of maintenance. Details are to be provided on the construction of this corridor in particular in relation to materials proposed for the base and sides of this riparian strip as well as its medium to long term management and maintenance, which should be agreed with Water Services and the Parks and Green Infrastructure Division prior to the submission of this Additional Information.
 - h. Very little detail has been provided on the all-weather tennis courts and all weather pitch with this application. Full details of floodlighting and the surfacing are required for the all-weather facilities.
 - i. There is an area called 'a Controlled Open Space' to the gable end of the Traveller Accommodation Units. This area is a poorly laid out piece of open space with no overlooking and it would appear not to have any function. Consideration should be given to a revised layout of this general area to create a functional and safe recreational space. The applicant is advised to consult with the Housing Department and the Parks Division in this regard.
 - j. The small grassed area of open space to the north of Block 7 is surrounded on two sides by car parking as well as a bin store, sub-station and bicycle store. It is not sustainable to maintain such a small area of grass and the applicant is requested to consider hard surfacing with trees in integrated constructed tree pits.
 - k. Green roofs and roof gardens are proposed for a number of buildings on this site. The applicant is requested to submit specifications and details on them.
 - l. Further details are required on all boundary treatments to the site in particular boundary details in relation to where the Public Open Space adjoins Block 7 and the Water Services compound area and in relation to the Community building, traveller accommodation area, and all weather facilities should be detailed.
 - m. The applicant is requested to provide a rationale for the nature of the narrow buffer zone between the side and rear of the traveller houses and how access is proposed to the different pitches/courts.
14. The applicant is requested to consult with the Housing Department of Fingal County Council to agree details of Part V requirements and submit these as part of the additional information response.
15. In relation to Chapter 5 of the EIS, Flora and Fauna it is noted that Recommendation 2 of Section 5.2.6 has not been carried out. The applicant is requested to carry out a bat survey and submit the results to the Planning Authority.

16. There is insufficient information presented in relation to how the construction phase activities related to de-culverting the Bloody stream are to be carried out and managed so that potential contaminants do not enter the adjacent SAC. No details of the construction management plans and operational site protocols are presented and it is stated that all this can be agreed with the planning authority post-consent. It is the view of the Planning Authority that these matters need to be addressed pre-consent – otherwise the Planning Authority cannot be certain, for the purposes of Appropriate Assessment, that the project will not adversely affect the integrity and conservation status of any Natura site. The following information therefore needs to be provided as further information:
 - a. Detail of the measures that will be taken during the construction and operational phases to ensure that pollutants do not enter Baldoyle Bay SAC via the Bloody stream. This should include a Draft of the Construction Management Plan and Drafts of any operational site protocols. In addition a risk assessment (and any additional information required on foot of this) as referred to in correspondence with Inland Fisheries Ireland needs to be provided (see page 9 of the NIS).
17. 1. The applicant is requested to address the following transportation related issues and to consult with the Transportation Planning Section prior to making a submission:
 - a. A revised Transportation Assessment should be provided that assesses the key junctions identified in the current report based on the traffic counts carried out at the same locations.
 - b. The applicant should provide information detailing how the 31 space deficit in parking provision is to be addressed.
 - c. A revised layout of the underground car park should be provided. The layout should be rationalised to ensure that access to all parking is achievable in a safe and practical manner. Details of how the residential parking and commercial parking would be effectively separated should also be provided.
 - d. A revised layout should be provided which provides set-down parking for the crèche separated from the loading bays for deliveries. The spaces should be demarcated for the separate uses.
 - e. A revised taking-in-charge drawing should be provided either omitting the areas of the Plaza from forming part of the areas to be taken-in-charge or providing a change of materials at these locations that meets the Council's standards for taking-in-charge.
 - f. A drawing providing details of the proposed pedestrian crossing should be provided. The crossing should be a zebra crossing and the inclusion of a pedestrian crossing should be explored.
 - g. A drawing detailing the provision of a right turning lane at vehicular entrance number 5 which serves blocks 1-4 should be provided.

- h. Details of the emergency access junctions with the Howth Road should be provided along with details of the access control measures being employed to restrict access.
- 18. The phasing arrangement as set out on drawing 14-012-PL-1.111 provides for the construction under phase 1 of the 30 dwellings within terraces 1-4 in addition to the riparian corridor to the east and the public open space to the west of the block. It is the view of the Planning Authority that a sequential approach to the development from the town centre out should be considered as part of a phase 1 of development to ensure the orderly development of the site. The applicant is requested to re-consider the proposed phasing programme and to indicate the treatment of areas not undergoing immediate development and proposed linkages between developed and any undeveloped parts of the site where appropriate.
- 19. The applicant is requested to revise and update the EIS where appropriate on foot of this request for additional information.