

# STATEMENT OF RESPONSE TO AN BORD PLEANÁLA OPINION

FOR A

SHD RESIDENTIAL DEVELOPMENT AT PARKSIDE 4,  
PARKSIDE, DUBLIN 13

PREPARED BY

**MC** McGill Planning  
*Chartered Town Planners*

ON BEHALF OF

CAIRN HOMES PROPERTIES LIMITED

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## 1. INTRODUCTION

An Bord Pleanála issued a Direction dated the 2<sup>nd</sup> of August 2019 along with a Notice of Pre-Application Consultation Opinion also dated the 2<sup>nd</sup> of August 2019, which stated that it is of the opinion that the documents submitted with the request to enter into constitute a reasonable basis for an application for strategic housing development.

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, 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. *Details pertaining to the proposed riverside walkway and riparian buffer to be maintained including clarity as to the alignment of the river vis-à-vis the development site, extent of works including any landscaping proposals within the jurisdiction of DCC and FCC. Details should also indicate how the alignment of the walkway will link with the existing river walkway located to the rear of the permitted apartment developments along Marrsfield Avenue. Location of proposed crossing points over the river should be clearly indicated with full extent of works detailed and the relevant planning authority's jurisdiction in respect of such works.*
2. *Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-18(If and EIAR is not being submitted).*
3. *An Appropriate Assessment screening report and Natura Impact Statement if considered necessary which should consider inter alia the issue of surface water run-off and in combination effects of relevant Natura 2000 sites.*
4. *Boundary treatment to the proposed site including any proposals for the riverside walkway.*
5. *Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with contiguous lands/developments. In this regard details to address the comments set out in the Planning authority's Opinion pertaining to elevational treatments including use of external finishes should be addressed.*
6. *A Sunlight/Daylight analysis for the proposed development.*
7. *A site layout plan which clearly identifies the full extent of areas to be taken in charge.*
8. *A Building Lifecycle Report as per section 6.13 of Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018.*
9. *Details to address matters raised in the Transportation Planning Division's Report dated 23rd May 2019.*
10. *Details to address the matters raised in the Drainage Divisions report dated 27th May 2019*
11. *Details of any measures required to prevent interference with aviation.*

## 2. STATEMENT OF RESPONSE TO SPECIFIC INFORMATION REQUIRED

The following sets out how the applicant intends to respond to the Board's request for additional specific information to be submitted with the Stage 3 planning application. Please note that these should be read in conjunction with the accompanying detailed documentation prepared by McGill Planning, Openfield Ecological Services, MCORM Architecture, DBFL Consulting Engineers, SEHA, Traynor Environmental, IAC Archaeology, IES and Modelworks.

### **Response to Specific Item 1: Riverside walkway and riparian buffer**

*Details pertaining to the proposed riverside walkway and riparian buffer to be maintained including clarity as to the alignment of the river vis-à-vis the development site, extent of works including any landscaping proposals within the jurisdiction of DCC and FCC. Details should also indicate how the alignment of the walkway will link with the existing river walkway located to the rear of the permitted apartment developments along Marrsfield Avenue. Location of proposed crossing points over the river should be clearly indicated with full extent of works detailed and the relevant planning authority's jurisdiction in respect of such works.*

### **Applicant Response**

As set out in the Clongriffin – Belmayne Local Area Plan 2012 (extended to 2022), the River Mayne Linear Park is a key element of the development of the Local Area Plan. The aim is to enable the connection of green spaces and natural features to the wider area. The LAP recognises that this will be a multi phased development incorporating the walkway as developments are completed. The role of the River Mayne is to deliver “*a linear park along its course connecting into Fingal*” as recognised within the Development Plan. The connection of a green route into Fingal will be achieved in conjunction with Fingal County Council. In line with the LAP, this area has been designed in order to “*to co-ordinate between open space, biodiversity and flood management, in progressing a green infrastructure network.*” The delivery of this section of the walkway will, in line with the LAP aims, tie together the northern edge of the developing lands and unify the different sections to the east and west through the completion of the River Mayne Linear Park and create the greenway connection to the Baldoyle Estuary.

The proposed development, in line with policy EOSP3, achieves this goal whilst also protecting and enhancing the riparian corridor, providing a recreational route and enhances the walking and cycling access within and around the site.

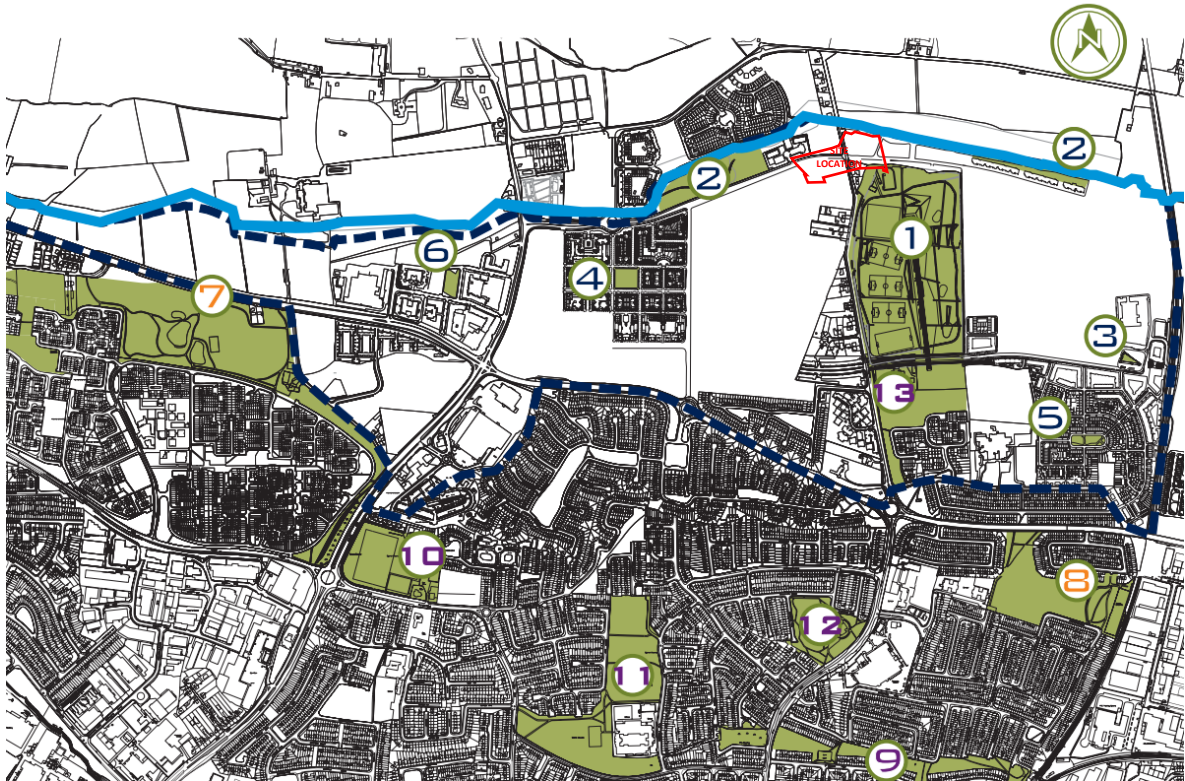


Figure 1 Extract from the LAP showing Existing Parks, Amenity and Recreation Areas in DCC

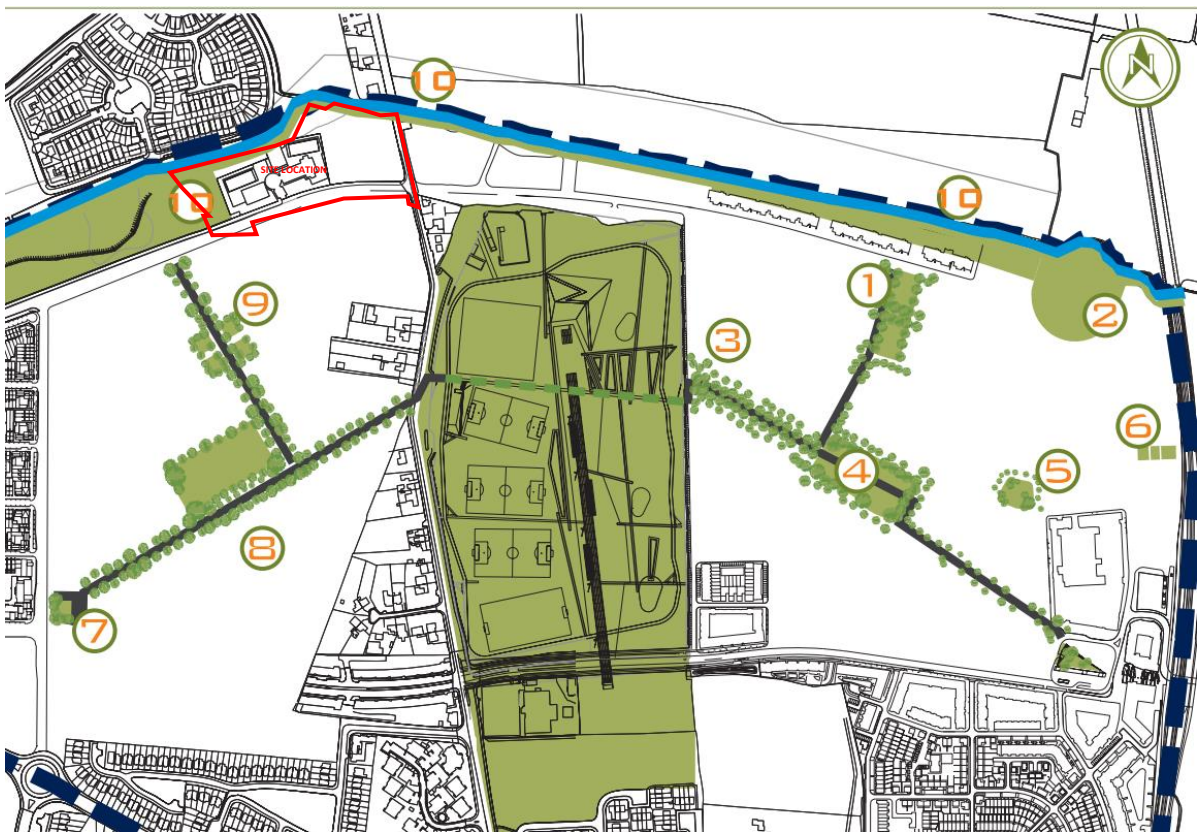


Figure 2 Extract from LAP indicating Planned but not yet completed Public Open Space Areas



Figure 3 Extract from LAP showing Environment and Open Space Amenity Strategy

The landscape plan and report by AIT landscape architects set out details relating to the proposed riverside walkway and riparian corridor proposed within the extent of the site submitted as part of the application. The proposal for this area along the River Mayne is a simple circulatory network which connects to surrounding existing paths and provides an interesting walking route beside the river in line with the LAP. The proposed landscaping design is simple and naturalistic. The park will contain robust seating areas should the area flood, as well as a basketball half court to the eastern end and will link into the existing children's play area.



Figure 4 Landscaping treatment of the riverside walk and riparian buffer

The park, which is directly accessed from the site, will also have connections to the surrounding green spaces at Castlemoyne across the existing footbridge and to the surrounding residential developments located within Fingal County Council jurisdiction. The

alignment of the proposed riverside walkway has been positioned to ensure a future connection to the walkway to the rear of developments along Marrisfield Avenue to the east of Balgriffin Park Road. Figure 5 shows how the proposed design of the linear park connects into the existing network of open spaces and existing paths in the surrounding area. The proposal also includes a new pedestrian link across Balgriffin Park road to the east of the site. This pedestrian link will connect the proposed pedestrian footpaths around the site with the permitted footpath which is currently under construction on the opposite side of the road. This is the missing element to complete the linear park.



Figure 5 Connections to surrounding lands

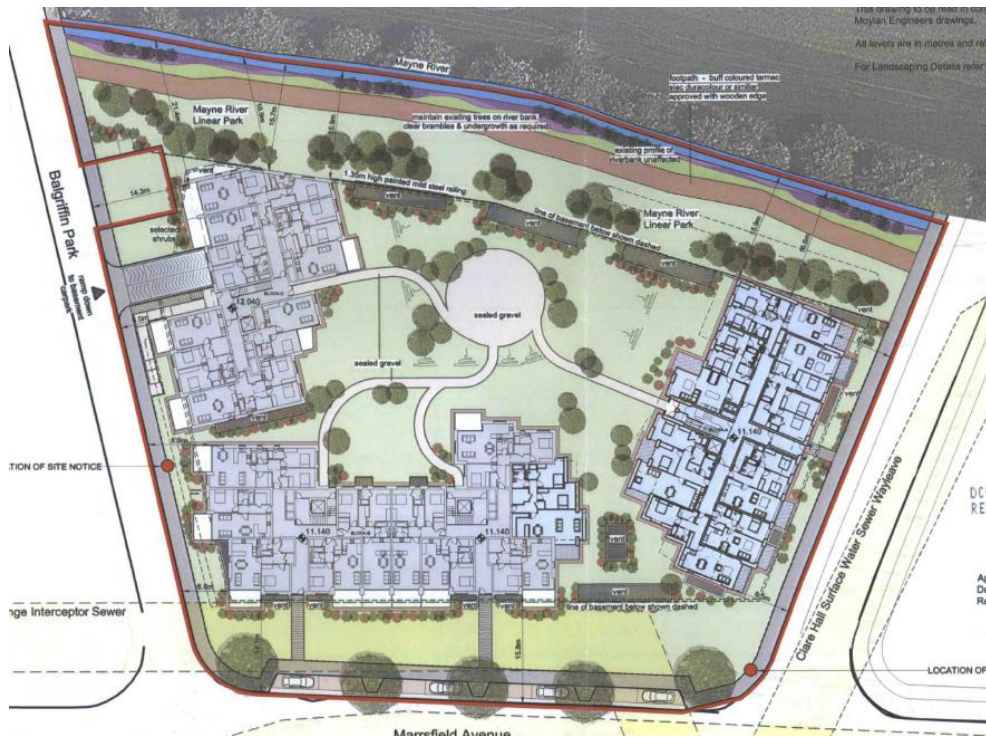


Figure 6 Permitted neighbouring development with riverside walk which this development will connect into

The apartment developments to the east of Balgriffin Park Road are currently under construction and were granted under DCC Planning Refs 3380/15 (as amended by 4266/16 and 2717/19), and 3247/14 (as amended by 2478/17, 3696/18, and 2719/19) and both schemes provide for sections of the Mayne River Linear Park which this proposed development will link into.

When the current proposal and the apartment developments to the east are completed then a continuous river walkway will extend along the River Mayne connecting to the existing walkway currently in place to the rear (north) of the existing Marsfield Avenue apartments in Clongriffin.



Figure 7 Proposed link across Balgriffin Road



This pedestrian crossing facility will be provided in conjunction with Dublin City Council (who are the Local Authority with jurisdiction in this section of the road where the crossing facility is proposed) when the developments on both sides of Balgriffin Park Road are being completed.

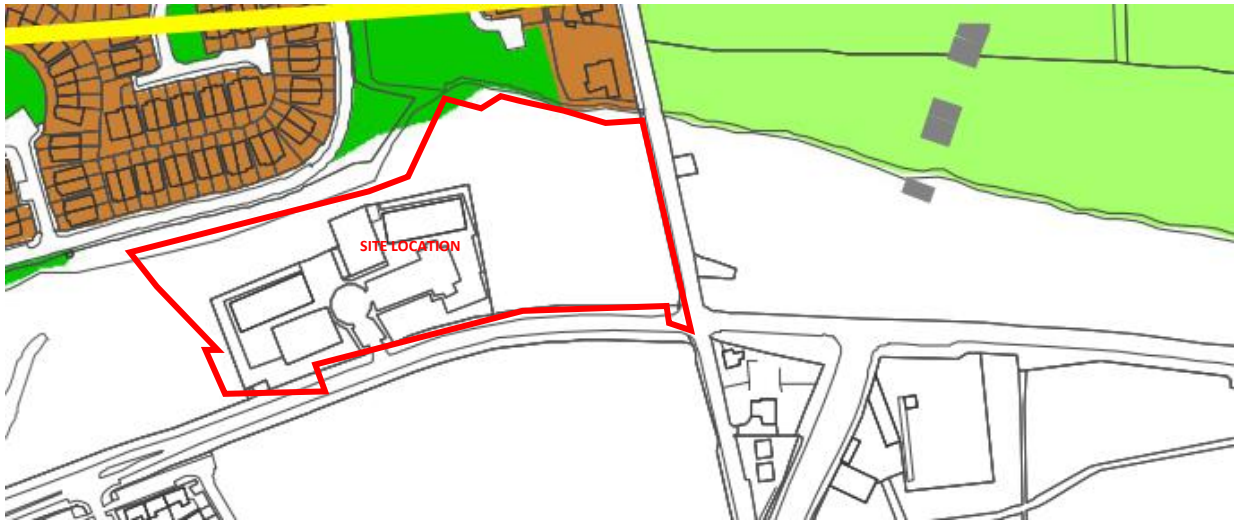


Figure 8 Extract from Fingal County Council Development Plan showing the boundary of Fingal jurisdiction

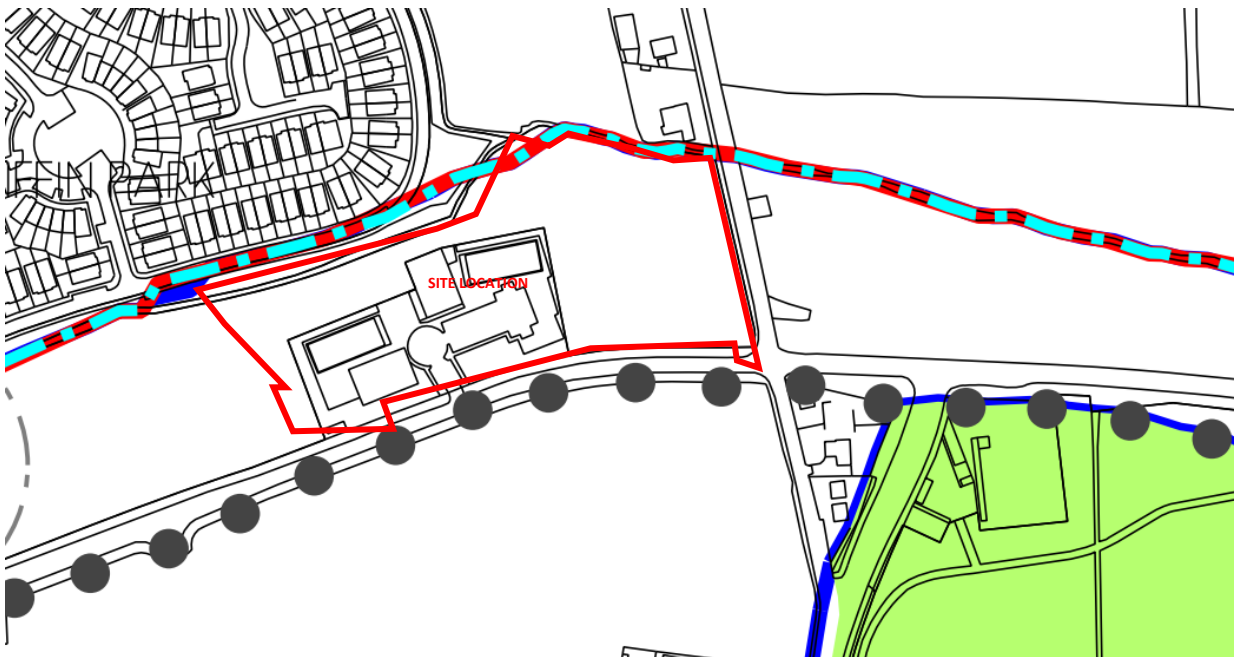


Figure 9 Extract from Dublin City Council Development Plan showing the boundary of DCC jurisdiction

As noted in An Bord Pleanála's opinion the site falls within the jurisdiction of both Fingal County Council and Dublin City Council. All of the built development (the 4 apartment blocks) falls entirely within the jurisdiction of Dublin City Council. Only a small area of c. 680sqm of the application site falls within Fingal County Council which is located beside the river. It is intended to treat this land in the same way as the remainder of the linear park. This is in line with the objectives in the LAP which states "To co-ordinate with Fingal County Council and

*other stakeholders on the completion of a phased plan and delivery of a linear park along the course of the River Mayne and enhancement of the biodiversity value of the riparian corridor.”*



Figure 10 Small area of land indicated by hatching within Fingal County Council jurisdiction. As can be seen the proposed crossing point is within DCC lands.

As can be seen from the Taken In Charge Drawing it is intended that the parkland within this application will be maintained and managed by the Local Authorities. It is acknowledged that there are two Local Authorities with an interest in this land, Fingal County Council and Dublin City Council. However, it is understood from pre-application discussions that where the land is south of the river it would be managed and maintained by Dublin City Council and where north of the river it would be managed and maintained by Fingal County Council. This can be fully agreed with each Council in accordance with a suitably worded condition.



Figure 11 New Layout showing Taken In Charge plan

## Response to Specific Item 2: EIAR requirement

*Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-18 (if and EIAR is not being submitted).*

### Applicant Response

A full EIAR has been prepared for the development and is submitted with the application.

## Response to Specific Item 3: AA screening report and NIS requirement

*An Appropriate Assessment screening report and Natura Impact Statement if considered necessary which should consider inter alia the issue of surface water run-off and in combination effects of relevant Natura 2000 sites.*

### Applicant Response

An NIS has been prepared for the proposed development by Openfield ecological services and submitted with the application.

## Response to Specific Item 4: Boundary treatment

*Boundary treatment to the proposed site including any proposals for the riverside walkway.*

### Applicant Response

Please see landscape plan and report by Ait Landscape Architects submitted with the application which details the boundary treatments proposed.

The centrally located over podium public open space is intended to be a 'green finger' linking the Mayne River Park via stepped access through the proposed development to Parkside

Boulevard. The design strategy for the park will be to employ a modest design philosophy; a simple circulation network will connect to surrounding pathways and bridge crossings with a riverside walk through wetland scrapes. It is intended to maintain the riverside's natural appearance and quality by having limited intervention. The boundary to the riverside will be left open with no hard boundary treatments and will be enhanced with woodland and wetland planting that include native tree species in keeping with the existing riverside condition. This section of the riverside walk will connect with and form part of adjacent walking routes along the River Mayne and will provide an excellent opportunity for outdoor leisure activities whilst encouraging an engagement with nature. The park will contain robust seating elements designed to undergo inundation during flood events such as the concrete seating terrace that will form an informal amphitheatre on its eastern side.

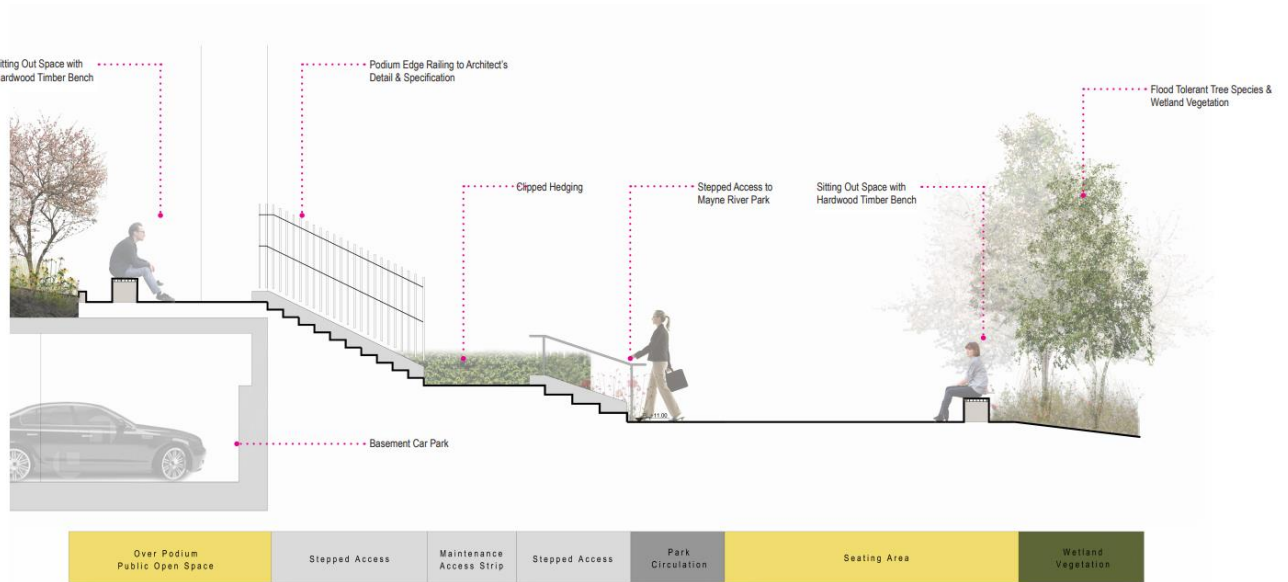


Figure 12 Ait section indicating relationship between proposed development and the linear park

Immediately around the buildings themselves it is proposed to have an estate railing and a clipped beech hedge, and also to reuse the existing boundary treatments on the site. It is also proposed to use much of the existing boundaries around the site and relocate them. Please see the boundary treatment plan, railing section, and landscape sections.

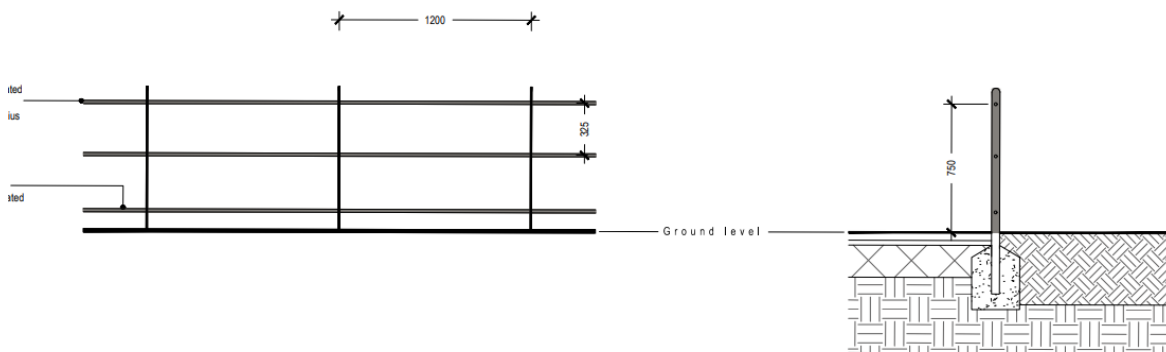


Figure 13 Boundary treatments

## Response to Specific Item 5: Photomontages

*Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with contiguous lands/developments. In this regard details to address the comments set out in the Planning authority's Opinion pertaining to elevational treatments including use of external finishes should be addressed.*

The comments from Dublin City Council regarding finishes also stated:

- *It is recommended that the blocks are primarily finished in a brick treatment – with limited use of render or lighter panels especially on less sunlit elevations.*

## Applicant Response

Please see Photomontages prepared by Modelworks and drawings prepared by MCORM Architects which have been submitted with the application. The viewpoints for the photomontages were selected to show the development from all directions and a variety of distances, to illustrate the development's interface with the adjacent streets, neighbourhoods and open spaces.

Sections and contiguous elevation along with materials have been addressed within the drawings and design statement prepared by MCORM Architects. We note that DCC recommendations regarding the use of brick, and limited render or lighter panels has been applied to the elevations with all facades within the scheme now predominately comprised of brick. We also note the proposals to include the use of stone cladding within the scheme to frame certain elements. The use of stone will provide additional variety of material and the additional architectural elements will reinforce the elevational rhythm along Parkside Boulevard and to the principle facades. These changes in materials breaks down the overall massing of the buildings and provides visual interest to these buildings.



Figure 14 Extract of the street elevation along Parkside Boulevard showing the variation in materials.

## **Response to Specific Item 6: Sunlight/Daylight analysis** *A Sunlight/Daylight analysis for the proposed development.*

### **Applicant Response**

A Sunlight/ Daylight analysis has been prepared for the proposed development by IES and is submitted with the application. This report measured the daylight impact to dwellings on Castlemoyne Road and Parkside Boulevard comparing it to the existing situation. It also considered the sunlight and daylight within the proposed development itself.

The report provided a shadow analysis for the existing and proposed scheme throughout the year. During the spring and summer periods there is no overshadowing to the existing dwellings or any shading at all to the Parkside Boulevard dwellings. When the Castlemoyne Road dwellings to the north were considered, there is additional shading observed but this is limited to the winter months when the impact caused by overshadowing is generally less noticeable. This is similar to that experienced in any suburban location of this type. The report found that *“It can be concluded that overall the impact of overshadowing would have a negligible adverse impact on the existing dwellings.”*

In terms of daylight analysis of the existing buildings the report found that *“For the residential dwellings considered on Castlemoyne and Belmayne, all of the points tested have a vertical sky component (VSC) above 27% or not less than 0.8 times their former value (that of the Existing Scheme). Therefore, these points all exceed BRE recommendations.”*

For sunlight to the proposed amenity spaces the report found *“On the 21st of March almost 100% of the amenity areas would receive at least 2 hours of sunlight exceeding the BRE recommendations.”* This is in line with Section 3.3.17 of BRE’s Site Layout Planning for Daylight and Sunlight.

Within the proposed development the rooms were tested for average daylight. The report found that *“Based on the results of the rooms tested on First and Fourth floors, 92% of the tested spaces in the proposed scheme have an Average Daylight Factors (ADF) above the recommended values in line with the BRE guidelines. This number across the scheme would be expected to increase further if all of the upper rooms were included in the results.”*

## **Response to Specific Item 7: Taken in charge**

*A site layout plan which clearly identifies the full extent of areas to be taken in charge.*

### **Applicant Response**

Please see Taking in Charge Site Layout Plan (Drawing No. PL025) for the scheme provided with the Architectural drawing pack by MCORM Architects.



Figure 15 Extract of the Taking in Charge Site Layout Plan PL025

## Response to Specific Item 8: Building Lifecycle Report

*A Building Lifecycle Report as per section 6.13 of Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018.*

### Applicant Response

Please see Building Lifecycle Report submitted with the application.

## Response to Specific Item 9: Transportation

*Details to address matters raised in the Transportation Planning Division's Report dated 23rd May 2019*

### Applicant Response

In response to the items raised on Vehicular Access and Works to the road, the applicant has proposed the following:

- Locate the security gates accessing the basement at the base of the ramp to avoid queuing onto Parkside Boulevard.
- It is proposed that the parking bays on Parkside Boulevard will be for public use and will be offered for taking in charge.

In response to the items raised on Car Parking, the applicant has proposed the following:

- It is proposed to offer Parkside Boulevard for taking in charge.
- Details of the Car Parking Management Plan are provided in the Traffic and Transport Assessment provided by DBFL Consulting Engineers with this planning application.

In response to the items raised on Servicing and Emergency Vehicles, the applicant has proposed the following:

- A refuse marshalling area and loading bay has been provided on Parkside Boulevard for service and refuse vehicles.

A Taking in Charge drawing has been provided by MCORM Architects with this planning application.

A Preliminary Construction & Environmental Management Plan has been provided by DBFL Consulting Engineers with this planning application

The above along with all of the reports and drawings submitted by DBFL Consulting Engineers with the application address the matters raised in the 23<sup>rd</sup> May report.

### **Response to Specific Item 10: Drainage**

*Details to address the matters raised in the Drainage Divisions report dated 27th May 2019.*

#### **Applicant Response**

DBFL met with Dublin City Council Drainage Department and Dublin City Council Flooding Department on the 3<sup>rd</sup> of July 2019 and 30<sup>th</sup> of July 2019 respectively to discuss the proposed drainage and floodplain modification proposals. The overall surface water drainage and flooding strategy for the development was agreed in principle with Dublin City Council. The following has been agreed and incorporated into the final proposals:

- A Taking in Charge drawing has been provided by MCORM Architects with this planning application.
- Surface water sewers are generally located in areas to be taken in charge, where this is not possible a wayleave will be provided to Dublin City Council.
- A minimum of 3m has been provided between proposed public surface water sewers and the proposed structures.
- Details of the SuDs and surface water treatment measures are provided in Section 5 of the Infrastructure Design Report provided by DBFL Consulting Engineers.
- A slung drainage layout is provided on DBFL drawing number 190011-3001.
- The minimum riparian zone provided adjacent to the Mayne River is shown on drawing 190011-3000.
- Flood Exceedance, Smart Manholes, Combined Flood Events, Embankment Stability, Surface Water Outfall and Groundwater are addressed in the Site Specific Flood Risk Assessment and Section 5 of the Infrastructure Design Report provided by DBFL Consulting Engineers.
- It was agreed that underground attenuation is considered the most suitable option for the development due to space restrictions caused by the Mayne River floodplain and the development's footprint.



- It was agreed given the minor nature of the floodplain re-profiling, relatively small volumes and the excess compensation storage provided, a hydraulic flood model of the floodplain is not required.

In addition to the above, the applicant also commissioned JBA Consulting to undertake a third-party surface water audit on the proposed surface water drainage, flooding and attenuation strategy for the development. JBA Consulting specialise in hydraulics and hydrology and have undertaken a number of the regional flood risk management studies for the OPW. The final audit report concludes that the surface water drainage design for the proposed development is acceptable and meets the requirements of the GSDSDS, a copy of the report is included in the Infrastructure Design Report provided by DBFL Consulting Engineers.

The above along with all of the reports and drawings submitted by DBFL Consulting Engineers with the application address the matters raised in the 27<sup>th</sup> May report.

### **Response to Specific Item 11: Aviation interference**

#### ***Details of any measures required to prevent interference with aviation.***

#### **Applicant Response**

A Glint and Glare Study of the proposed development was carried out by Innovision in conjunction with the SEHA. The report assessed the potential ocular impact of glare emanating from sunlight reflections from proposed rooftop solar PV panels and the impact on the users of Dublin Airport. It was found that the level of “*potential glare from solar PV panels is similar to that of water and much less than that of materials such as concrete and vegetation.*” The report found that there would be no expected nuisance or hazardous glare for users of the nearby Dublin Airport as a result of the inclusion of solar PV panels to the roofs of any of the apartment blocks in this development. A copy of this report is included in the application and demonstrates the proposed development will have no interference on aviation.

SEHA have liaised with IAA who have confirmed they are satisfied with the proposal. A copy of their email correspondence, dated the 9<sup>th</sup> October 2019, is enclosed as Appendix 1.

### **3. CONCLUDING REMARKS**

As noted in the introduction the ABP Opinion has not raised any specific issues that had to be addressed in relation to the proposed development. Specific additional information requested by ABP has been provided with this application. Following the opinion from ABP minor amendments and revisions have been made to the scheme to ensure that the development remains of the highest design quality and is accordance with all relevant national, regional and local planning policy and the proper planning and sustainable development of the area.

## APPENDIX 1

### COPY OF IAA CORRESPONDENCE REGARDING THE GLINT & GLARE REPORT

#### Brenda Butterly

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**From:** Brenda Butterly  
**Sent:** Thursday 10 October 2019 11:45  
**To:** Brenda Butterly  
**Subject:** Proposed Residential Development at Parkside 4, Parkside, Dublin 13 - Glare and Glint Study  
**Attachments:** 19164 Parkside 4 Development Rev I.pdf; 304387 Notice of Pre-Application Consultation Opinion.pdf; Parkside\_4\_GG\_Report\_20191003.pdf; Seha Technical Services Ltd Parkside 4 - Clongriffin\_obs 18.09.19.docx  
**Importance:** High

**From:** MACCRIOSTAIL Cathal <[Cathal.MacCriostail@IAA.ie](mailto:Cathal.MacCriostail@IAA.ie)>  
**Sent:** Wednesday 9 October 2019 16:07  
**To:** Shane Mullins <[ShaneMullins@seha.ie](mailto:ShaneMullins@seha.ie)>  
**Cc:** Nigel Somerfield <[nigel.somerfield@daa.ie](mailto:nigel.somerfield@daa.ie)>; HUGHES John <[John.HUGHES@IAA.ie](mailto:John.HUGHES@IAA.ie)>; Simon Killeen <[SimonKilleen@seha.ie](mailto:SimonKilleen@seha.ie)>  
**Subject:** FW: Proposed Residential Development at Parkside 4, Parkside, Dublin 13 - Glare and Glint Study  
**Importance:** High

Dear Shane,

Our conversation just now refers along with the attached correspondence in relation to a proposed Residential Development at Parkside 4, Parkside, Dublin 13

In my capacity of IAA Air Navigation Service Provider(ANSP) Manager Airspace and Navigation, I can confirm that I accept the findings of the attached Glint and Glare report, completed by Innovision, do not create any impact for flight procedures to and from Dublin Airport.


I have copied my Regulatory Colleague, John Hughes, Manager Aerodromes with the Safety Regulatory Directorate for information.

I'll be happy to follow up with additional formal correspondence as required and you're welcome to refer any queries to me.

Kind regards,

Cathal

**Cathal Mac Criostail**  
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 Do you really need to print this?

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**From:** Shane Mullins <[ShaneMullins@seha.ie](mailto:ShaneMullins@seha.ie)>  
**Sent:** Friday 4 October 2019 11:53  
**To:** Nigel Somerfield <[nigel.somerfield@daa.ie](mailto:nigel.somerfield@daa.ie)>; MACCRIOSTAIL Cathal <[Cathal.MacCriostail@IAA.ie](mailto:Cathal.MacCriostail@IAA.ie)>  
**Cc:** Simon Killeen <[SimonKilleen@seha.ie](mailto:SimonKilleen@seha.ie)>  
**Subject:** Proposed Residential Development at Parkside 4, Parkside, Dublin 13 - Glare and Glint Study  
**Importance:** High

Hi Nigel and Cathal

Further to our recent discussions with your IAA colleague Deirdre Forrest we have been advised that you are the point of contact for future correspondence on this development for the DAA and the IAA respectively. We have enclosed a copy of the glare and glint report as issued by Innovision for the development at Parkside 4, Dublin 13 and we would ask if you could review the report and if acceptable issue correspondence confirming acceptance of the proposed installation

Regards

**Shane Mullins**  
Senior Engineer

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