

Statement of Response to ABP's Opinion

In respect of

Proposed Development at Claremont, Howth, Dublin 13

Prepared by

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On behalf of

Atlas GP Limited

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1.0 INTRODUCTION

- 1.1 This document sets out a response to the points raised in the opinion received by An Bord Pleanála, dated 17th July 2019, in relation to the proposed strategic housing development on lands at Claremont, Howth Road, Co. Dublin 1. Case Reference ABP- 304637-19.
- 1.2 The opinion noted that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.
- 1.3 On this basis the application has been prepared and finalised on the same principles of the pre application consultation request. The specific information to be submitted with the relate to the following:
1. That the Statement of Consistency adequately addresses Local Objective 108 of Fingal County Development Plan in relation to the height of the proposed development and if it is considered necessary, a material contravention statement should be submitted. Similarly, that the Statement of Consistency adequately addresses the matter of core strategy of the Fingal County Development Plan 2017, in the light of the number of units proposed, having regard to section 8.1 of the Chief Executive Opinion.
 2. A report, including GCIs, visualisations and cross sections, as necessary, which clearly shows the relationship between the proposed development and nearby Protected Structures. A Visual Impact Assessment should be submitted in this regard. In addition, details should also include the interface between the proposed development and Howth Road/railway line/river; boundary treatments; public realm and ground floor elevational treatments.
 3. A report that addresses issues of residential amenity (both existing residents of nearby developments and future occupants), specifically with regards to daylight/sunlight analysis, overlooking, overshadowing, overbearing and noise. The report shall include full and complete drawings including levels and cross sections showing the relationship between the proposed development and nearby residential development.
 4. 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 opens space are accessible, usable and available to all. Details relating to the materiality of the of the proposed interface between proposed development and adjoining lands should also be submitted. Additional cross sections, CGIs and visualisations should be included in this regard.
 5. A detailed phasing plan for the proposed development.
 6. School demand and concentration report.

7. Additional details in relation to surface water management for the site, having regard to the requirements of the Drainage Division as indicated section 8.2.7 of the Planning Authority's Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment to specifically relating to appropriate flood risk assessment that demonstrates the development will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk.
 8. Additional details and justification for the proposed development in relation to roads, access and circulation, having regard to the report of Transport Division of the Planning Authority as detailed in in section 8.2.4 of their opinion.
 9. Waste management details.
 10. A lifecycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standard for New Apartments (2018). This report should specifically address proposed materials, finishes and detailing which seek to create a distinctive character for the development and which provides for active frontage and corners. The documents should also have regard to the long term managements and maintenance of the proposed development.
 11. A schedule of floor area for all proposed units.
 12. Site Specific Construction and Demolition Waste Management Plan.
- 1.4 Section 2 of this report sets out how the applicant has responded to each of the issues raised by the Board in their Consultation Opinion, with particular reference to HJL Architects Design Statement Response Document, and drawings prepared by the design team and which accompany this application. This Statement of Response, and the associated amendments to the scheme, in turn responds to the key issues raised by the Planning Authority in their Report on the pre-application proposals and the Board's Opinion.
- 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 pursuant to article 285(5)(b) of the 2017 Regulations.

Item No.1(a) – That the Statement of Consistency adequately addresses Local Objective 108 of Fingal County Development Plan in relation to the height of the proposed development and if it is considered necessary, a material contravention statement should be submitted.

2.2 The Statement of Consistency has been updated and a material contravention statement has been prepared to demonstrate that while the proposed development may be considered to materially contravene Local Objective 108 in the development plan, An Bord Pleanala, may grant permission for the proposed development having regard to national policy and regional policy, which postdate the Fingal Development Plan, 2017-2022.

2.3 **Item No.2** – A report, including GCIs, visualisations and cross sections, as necessary, which clearly shows the relationship between the proposed development and nearby Protected Structures. A Visual Impact Assessment should be submitted in this regard. In addition, details should also include the interface between the proposed development and Howth Road/railway line/river; boundary treatments; public realm and ground floor elevational treatments.

2.4 Please see attached the report prepared by Henry J Lyons and The Paul Hogarth Company. It outlines the relationship with the existing dwellings in the locality, with Protected Structures in the vicinity, boundary treatments, public realm interface and ground floor elevations. See also the Conservation Assessment by Historic Building Consultants.

2.5 **Item No. 3** - A report that addresses issues of residential amenity (both existing residents of nearby developments and future occupants), specifically with regards to daylight/sunlight analysis, overlooking, overshadowing, overbearing and noise. The report shall include full and complete drawings including levels and cross sections showing the relationship between the proposed development and nearby residential development.

2.6 Henry J Lyons has produced a report on this issue, with assistance from J.V Tierney & Co. and AWN Consulting. Please see the report for the full set of drawings showing levels and cross sections. The report also deals with separation distances; the provision of screening on balconies is shown to prevent overlooking of 'Ashbury' and other residential properties in the vicinity.

2.7 **Item No 4** - 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 to all. Details relating to the materiality of the of the proposed interface between proposed development and adjoining lands should also be submitted. Additional cross sections, CGIs and visualisations should be included in this regard.

2.8 Please see the Landscape Design report by TPHC.

2.9 **Item No. 5** A detailed phasing plan for the proposed development.

Please see the construction management plan prepared by BMCE. The entire development will be delivered in one phase. However, development will occur sequentially and will take 4 years to complete.

2.10 **Item No. 6** School Demand and Concentration Report.

A School Demand and Concentration Report has been prepared. Howth is well served by schools - there are 6 primary schools, 4 secondary schools and another school that provides for both cycles – Sutton Park School. There are 1,880 primary school places, 2,368 secondary school places and 345 places in Sutton Park School.

3 CONCLUSION

- 3.1 This document outlines how the items outlined in the pre-application consultation opinion from An Bord Pleanála in relation to the proposed development at Claremont, the former Techrete site in Howth, Co. Dublin.
- 3.2 The document addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the planning submission documentation.
- 3.3 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.
- 3.4 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 and therefore should be granted planning permission in this regard.



John Spain Associates