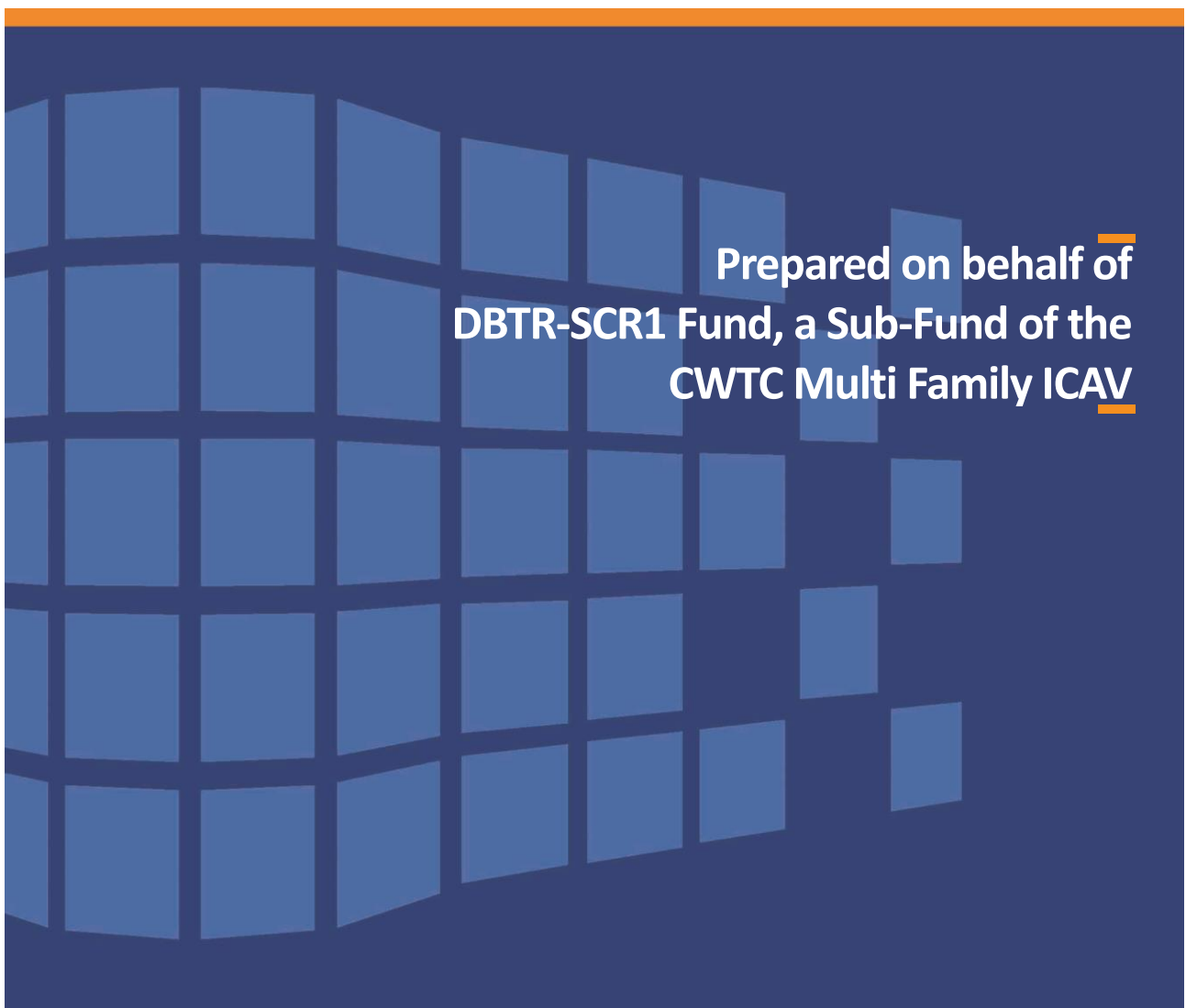


# Response to An Bord Pleanála Pre-application Consultation Opinion

Proposed Strategic Housing Development on the former Player Wills site and undeveloped land owned by Dublin City Council at South Circular Road, Dublin 8.

December 2020



## Document Control Sheet

<b>Client</b>	DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV		
<b>Project Title</b>	Proposed Strategic Housing Development on the former Player Wills site and undeveloped land owned by Dublin City Council at South Circular Road, Dublin 8.		
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# 1. Introduction

## 1.1 Introduction

This report addresses the 8 no. specific information requirements requested by An Bord Pleanála (ABP) in their Notice of Pre-Application Consultation Opinion (case ref. ABP-307178-20) issued on the 4th August 2020.

The layout of the proposed development is detailed in a series of planning drawings submitted by Henry J Lyons Architects and Kohn Pedersen Fox Architects, engineering drawings by Barrett Mahony Consulting Engineers and landscape drawings by Niall Montgomery & Partners, and supplementary information by McCutcheon Halley Chartered Planning Consultants.

## 2 Statement of Response to Specific Matters

### 2.1 Building PW1 - Overall Layout/Format of Shared Living Accommodation in PW1

*Further consideration/justification of the documents as they relate to the overall layout/format of the shared living accommodation in PW1, including consideration/justification for the large number of units per floor on levels 1-4 and lack of a cluster format; consideration of the quantum of shared living/kitchen space per bedspace, as well as location and number of satellite kitchens proposed per floor; sunlight/daylight analysis of rooms on entire floor 1, showing acceptable level of residential amenity for future occupiers, in addition to overshadowing analysis of the central courtyard area.*

#### 2.1.1 Layout and Format of PW1 Building

The proposed design submitted to An Bord Pleanála for pre-application consultation included 331 no. single occupancy, private living areas. This application seeks permission for 240 no. single occupancy, private living areas in building PW1.

The proposed 240 no. shared accommodation units are in the retained former Player Wills factory building. At the early stage of the design development, the appointed project architect, Henry J Lyons, carried out a feasibility study to determine if a cluster arrangement could be progressed, having regard to the over-arching objective to retain the architectural and historic integrity of the original fabric of the former factory building.

The feasibility study identified that a clustered floor layout, would create a significant demand for use of access cores that would conflict with the objective to create a multifunctional community, arts and cultural space at ground floor level, where the industrial heritage of the building can be appreciated by residents and the wider community. For these reasons, an alternative approach to the design was deemed necessary.

The proposed layout provides for each private living area to act as a singular distinct entity which is accessed from a corridor that extends the full length of the building. This linear layout allows for appropriately distributed communal kitchens which feature glazed corridor-facing walls that create punctuations of light and enhance the usability of these spaces (See **Drawing No's. PL1100-PL1102**).

On each level are 2 no. primary combined kitchen & living areas supported by satellite kitchens as set out in the table below. Following the pre-application consultation meeting with An Bord Pleanála, the quantum and distribution of the proposed shared kitchen/dining areas was reconsidered. This design exercise ran in tandem with the addition of 47 no. Build to Rent units in PW1 and the reduction of shared accommodation units from 331 no. to 240 no. As a result, the distribution of kitchens has been notably improved, and now provides for a

maximum distances of c. 21m from a private living space to the kitchen/dining area, and thus each kitchen is easily accessible to all proposed private living areas.

Level	Total Bedspaces	Main K/L No. 1 (sq.m)	Main K/L No. 2 (sq.m)	Sat. No. 1 (sq.m)	Sat. No. 2 (sq.m)	Sat. No. 3 (sq.m)	Sat. No. 4 (sq.m)	Total Kitchen (sq.m)
01	62	130	65	25	25	31	-	276
02	62	130	65	25	25	31	-	276
03	58	130	50	19	19	19	-	237
04	58	120	50	19	19	19	19	247

In terms of cooking stations (hobs) provided per kitchen, the following is the breakdown. Individual cooking stations will be shared by approx. 5 rooms and this is comparable to occupancy levels within a typical 4-bedroom home, where there is one kitchen available to serve the household.

Level	Total Bedspaces	Main K/L No. 1	Main K/L No. 2	Sat. No. 1	Sat. No. 2	Sat. No. 3	Sat. No. 4	Total Hobs	Cooking Stations per Bedspace
01	62	4	4	2	2	2	-	14	4.8
02	62	4	4	2	2	2	-	14	4.8
03	58	4	3	2	2	2	-	13	4.5
04	58	2	3	2	2	2	2	13	4.5

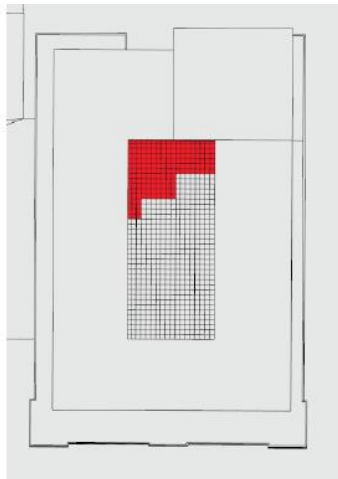
### 2.1.2 Daylight Analysis of Floor 1 – Building PW1

A **Daylight, Sunlight & Overshadowing Report** accompanies this application under separate cover and should be considered in conjunction with this response.

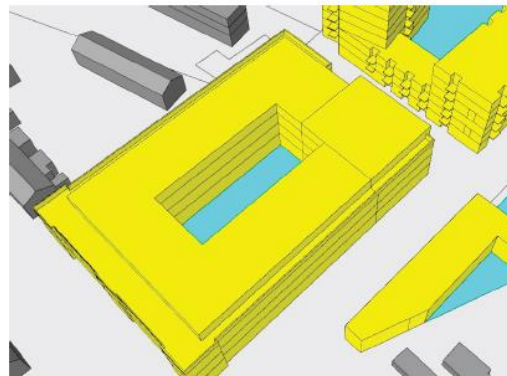
The average daylight factor (ADF) analysis of the rooms proposed on level 01 demonstrates that all of the rooms have an ADF greater than the recommended minimum values (1.5% for living rooms and 1.0% for bedrooms) as stated under the BRE’s 2011 guidance document ‘*Site Layout Planning for Daylight and Sunlight*’.

### 2.1.3 Sunlight to Central Courtyard Area

The courtyard in the former Player Wills building (PW1) was analysed to determine the existing sunlight penetration. As is illustrated below, in its current context, the area falls significantly below the BRE Site Layout Planning for Daylight and Sunlight standard that for a space to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on the 21st of March.



Block	Total Area	> 2 solar area	% > 2 Hours
PW1	699	175	25



### EXISTING FACTORY BUILDING SUNLIGHT ENVIRONMENT

Chapter 11 of the Dublin City Development Plan 2016-2022 incorporates policies that support the retention of the original features of historic industrial architectural merit in the former Player Wills building. Relevant policies are;

- **CHC1:** To seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city.
- **CHC3:** To identify and protect exceptional buildings of the late twentieth century; to categorise, prioritise and, where appropriate, add to the RPS. Dublin City Council will produce guidelines and offer advice for protection and appropriate refurbishment.
- **CHC5:** To protect Protected Structures and preserve the character and the setting of Architectural Conservation Areas. The City Council will resist the total or substantial loss of: Non-protected structures which are considered to make a positive contribution to the character and appearance of an Architectural Conservation Area, unless it can be demonstrated that the public benefits of the proposals outweigh the case for retention of the building.

To satisfy these policy requirements it is necessary to minimise interventions so that the original fabric of the former Player Wills factory building may be retained. Improvements in sunlight penetration to the existing courtyard could only be achieved if significant design interventions were made to the existing building and this would render the proposal inconsistent with the above policy objectives. Therefore, it is necessary to apply a balanced approach.

It is noted that significant public and communal open space is proposed on the wider site and analysis of these areas demonstrates that they achieve and exceed the BRE threshold. The full results are presented in the **Daylight, Sunlight & Overshadowing Report**. This availability of high-quality amenity areas offers both future residents and the wider community a range of alternative amenity areas.

The communal amenity requirements for PW1 is delivered in the form of a roof terrace areas and the sunlight analysis demonstrates that the three individual areas proposed significantly exceed the BRE threshold value of 2 hours of sunlight over 50% of the area on the 21<sup>st</sup> March. The actual results are 100% on 2 no. roof terraces and 87% on the other.

The courtyard is retained and integrated into the proposed design as public open space. It assists with promoting permeability, allowing people to access the development from the entrance off South Circular Road into the wider development via a 'Red Carpet' landscape paving feature.

While the courtyard cannot meet the BRE Guideline, it is considered that it can still offer amenity value. The design adopts an approach to optimise the use of the area, through covering the area to allow the space support activities such as performances, markets and a spill out area for the community/cultural space within the building.

## 2.2 Building PW2 - Slenderness of the Towers

*Further consideration/justification of the documents regarding the slenderness of the towers in PW2.*

This section should be read in conjunction with the **Architectural Design Statement** prepared by Kohn Pedersen Fox Associates (KPF) and Henry J. Lyons (HJL) that accompanies the application.

The development of more appropriately spaced and sensitively designed tall buildings frees up space at ground level for public and private amenities and contributes to the more efficient use of scarce urban land resources through densification. This approach is supported by national planning policy to achieve compact urban growth.

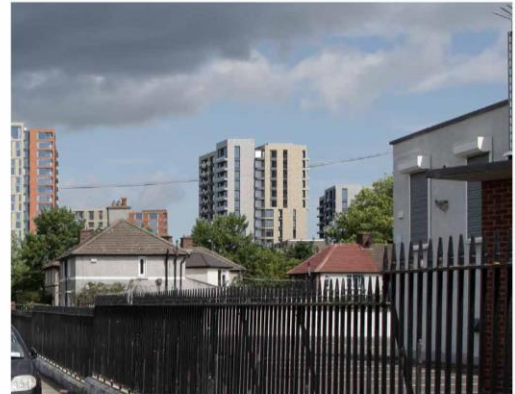
Tall buildings with projections when used with different typologies in combination with linear blocks create appropriate urban forms which hold the street edge and use the strategic placement of height to define hierarchy within a neighborhood.

Throughout the design process, the design of Block PW2 was subject to numerous revisions and iterations in its massing, fenestration and façade expression to the South West and North East towers until an appropriate townscape response was finalized. Please refer to the accompanying Architectural Drawing No's PL1200-PL1218.

Since the preparation of the **Masterplan** (submitted under separate cover), the design of the 2 no. towers has evolved and developed significantly. This evolution in the slenderness profile is illustrated overleaf when you compare View 3 which shows the design in October 2019, compared to View 18 is which is the scheme being submitted for this application.



October 2019 Scheme View 3



October 2019 Scheme View 18



January 2020 Scheme View 3



January 2020 Scheme View 18



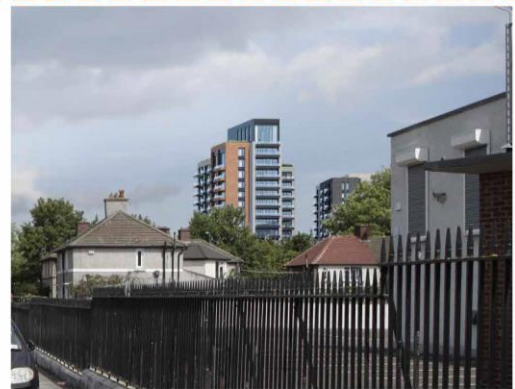
March 2020 Scheme View 3



March 2020 Scheme View 18



Current Scheme View 3



Current Scheme View 18

TOWER DESIGN EVOLUTION



The articulation of the towers in PW2 has been developed to respond to the shared desire of Dublin City Council and An Bord Pleanála for a more slender expression, whilst responding to the fundamental demands of building efficiency and the efficient use of urban land. By breaking down the mass of each tower into distinct elements, the towers as proposed to incorporate an expression of a grouping of taller units, each of which is more-slender than the target 3:1 ratio as illustrated below.



**NORTH AND EAST ELEVATION AND LAYOUT PLANS SHOWING TOWER SLENDERNESS**



Outline of footprint achieving 3:1 slenderness ratio overlaid over current plan - this footprint would only allow for 3 apartments per floor.

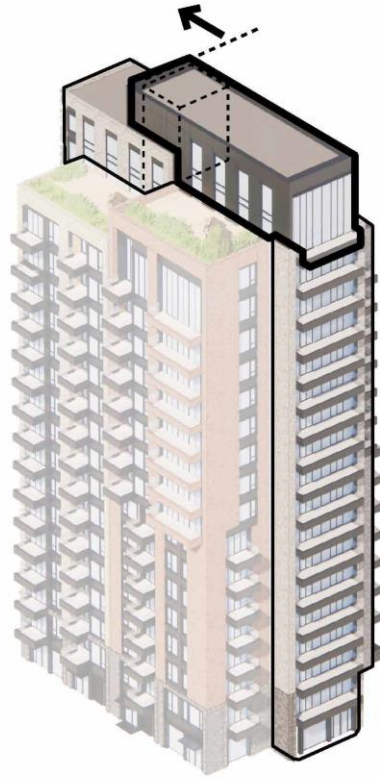
### WEST AND SOUTH ELEVATION AND LAYOUT PLANS SHOWING TOWER SLENDERNESS

The images included overleaf, illustrate the design refinements to the towers since the pre-application consultation meeting with ABP. This progression in the design is a direct response to the consultations held in relation to the townscape, and overall slenderness of the PW2 tower.

As can be seen when you compare the March 2020 design and the current proposal, the design enhances the skyline articulation, increases the perception of slenderness and animates the southern elevation to address both aspects. In addition, the current View 3 increases the perception of slenderness and enhances the expression of separate volumes which add visual interest to the building.



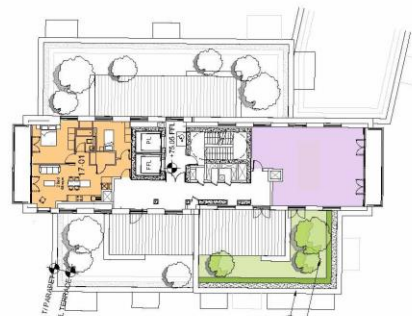
ABP submission March 2020  
Illustrative Axon



Current Scheme  
Illustrative Axon



ABP submission March 2020  
Plan with dormers with duplex 2 bed unit



Current Scheme  
Plan simplified with single storey 2 bed unit

### PW2 TOWER DESIGN FOR ABP PAC & CURRENT PROPOSAL

The image overleaf illustrates the two towers together, where the reading of a cluster of slender elements comprising the overall massing volumes is clearly discernible. The lower of the two towers (in the foreground) has been further articulated in plan (compared with the original masterplan massing) to create a substantial delineation of the separate volumes and further enhancing the verticality of the building.



CGI OF PROPOSED PW2 TOWER

## 2.3 Building PW2 -Design

*Further consideration/justification of the documents in terms of the number of dual aspect units in PW2; number of north facing single aspect units; internal layout with long corridors; sunlight daylight analysis; and wind-microclimate study.*

### 2.3.1 Dual Aspect Units

The 2018 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities establishes the following policy requirement;

*“that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e. on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design. Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous, it is an objective that there shall be a minimum of 50% dual aspect apartments.”*

The proposed development is an inner-city site, within the canal cordon and approx. 2.2kms southwest of the city centre. It benefits from excellent access to high-quality public transport including LUAS and Dublin Bus. It is brownfield in nature and forms part of Strategic Development Regeneration Area 12, St. Teresa’s Gardens designated in the City development plan. Having regard to the site’s characteristics a dual aspect ratio of between 33% and 50% is considered appropriate.

The proposed PW2 building includes 51% (212 no.) dual aspect units. It is noted that this represents a 9% (26 no.) increase in dual aspect units above the design presented for pre-planning consultation with An Bord Pleanála. This was achieved through the following design amendments;

- One north facing unit was revised to incorporate an additional west orientated window (14 more dual aspect units);
- To reduce the length of the common corridors in the mid-rise building, new 2 bed units were created (12 more dual aspect units).

### 2.3.2 North Facing, Single Aspect Units

Following revisions to the layout of the PW2 building as discussed above, one north facing single aspect unit per floor was revised to incorporate an additional west orientated window, which has incorporated an additional 14 no. dual aspect apartments.

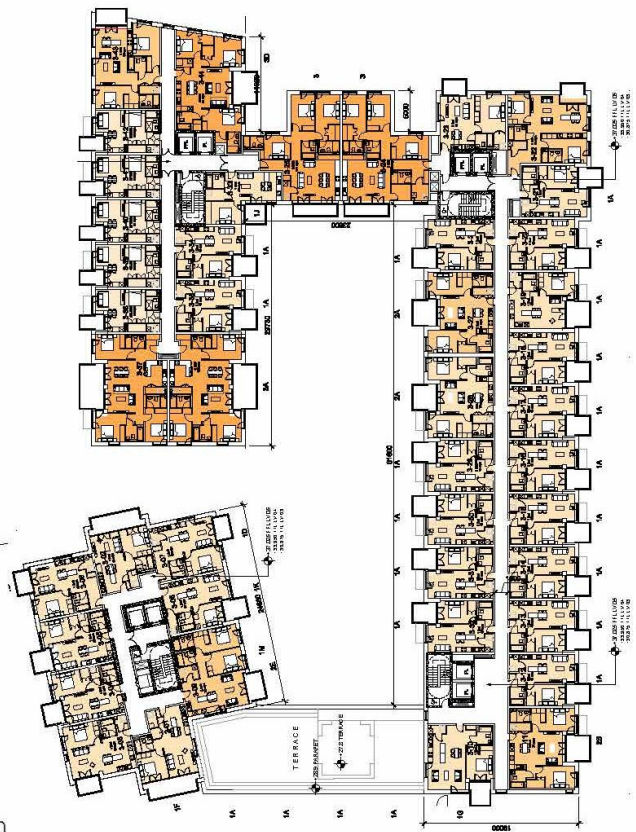
### 2.3.3 Corridors

The increase in dual aspect units as outlined above decreased the length of the corridors. The south east core has been relocated (1 structural bay towards north), to allow the layouts to be split and comply with adequate travel distances. The reconfiguration of these units resulted in improvements to the layouts of the common corridors.

This revision was presented to Dublin City Council at a meeting held on the 20th September 2020 and they noted their satisfaction with the amendments.



## PW2 CORRIDOR ARRANGEMENT FOR ABP PAC & CURRENT PROPOSAL



Previous scheme  
ABP submission March 2020



Revised scheme  
Current Application

PW 2 PREVIOUS SCHEME AND AS PROPOSED SCHEME FLOOR PLANS

### 2.3.4 Sunlight/Daylight Analysis

This section should be read in conjunction with the **Daylight, Sunlight & Overshadowing Report** prepared by IES Consulting and submitted under separate cover.

128 no. rooms across levels 1, 3 and 5 were tested for ADF. The rooms selected for testing represent 'worst-case' locations i.e. having obstructed views.

Overall, 85% of the rooms tested in PW2 achieve ADF values above the BRE guidelines. Since these rooms are 'worst case' locations, it is reasonably concluded that the results for the building as a whole would increase.

### 2.3.5 Wind/Microclimate Study

A **Pedestrian Wind Comfort Report** prepared by IES accompanies this application under separate cover.

The results of the north-west facing balconies of the PW2 block are positive in that they meet the sitting and standing comfort criteria of the Lawson's Pedestrian Comfort criterion, therefore overcoming the concern of the Board in this regard.

## 2.4 Impact of PW4 and PW5 on Neighbouring Dwellings

*Further consideration/justification of the documents as they relate to PW4 and PW5 and impact on neighbouring dwellings. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.*

Further consideration has been given to the boundary interface between PW4 and No.8 St. Catherine's Avenue. The design submitted for permission has introduced significant changes. The massing has been reduced from 3 storeys to 2 storeys along this boundary interface. The design submitted with the pre-application consultation request to ABP featured ground floor units with duplex units above; the current design removes the ground floor units, and the duplex units are entered at grade level.

These duplex units will replace the existing industrial unit and their site position and relationship to the boundary, together with their parapet and ridge height is similar to the existing unit on site. To mitigate overlooking, windows on the first-floor level are limited to secondary windows only with obscure glass proposed.

Regarding PW5, the elevational treatment of the access gallery has been redesigned resulting in elimination of the "lightbox" facade proposed at pre-application consultation stage. The revised facade consists of brick, perforated brick and a green wall. The facade elements will ensure neighbouring privacy is not compromised, whilst light transmission through the facade is minimised.

The revisions to building PW4 and PW5 have been presented to Dublin City Council in advance of lodging this application and were deemed acceptable.

## 2.5 Additional Matters

Furthermore, 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. Daylight/sunlight analysis for PW2 and for PW1.

A **Daylight, Sunlight and Overshadowing Study** has been prepared by IES Consulting and submitted under separate cover.

A synopsis of the ADF results for building PW2 is presented in section 2.3.4 of this report.

102 no. rooms were tested for ADF in PW1 across levels 1, 3 and 5. Overall, there is a 100% compliance rate with the BRE guidelines.

The results of the sunlight analysis of the proposed amenity areas in PW1 and PW 2 is reproduced below. The courtyard of block PW2 will achieve 52% and thus exceeds the BREs recommendation. The roof level amenity spaces is broken down into 5 no. areas and 3 no. areas significantly exceed the target value ranging from 89% to 98%, 1 no. area meets the 50% standard and 1 no. falls below on the reference date of the 21st March. The PW2 roof garden is broken into different spaces and overall excellent sunlight is achieved. Therefore, residents will benefit from a high quality amenity.

Location	Total Area (m <sup>2</sup> )	Area (m <sup>2</sup> ) >2 hours on 21 <sup>st</sup> March	Total % > 2 Hours 21 <sup>st</sup> March
PW 1 – 1	300	300	100
PW 1 – 2	150	150	100
PW 1 – 3	285	249	87
PW2 Courtyard -1	1223	640	52
PW2 -2	268	104	39
PW2 -3	915	901	98
PW2 -4	164	151	92
PW2 -5	90	45	50
PW2 -6	98	88	89

2. Details of the operational management provisions for the Shared Accommodation.

A **Shared Living Operational Management Plan** has been prepared by LIV Consult, and is submitted under separate cover.

As outlined in this document “The operational focus within the Player Wills Shared Living community will provide an exceptional customer experience, delivered through facilities management, events, and amenities to enhance resident’s lifestyle. Ubiquitous technology will exceed the needs of residents, from visual experience and work from home facilities to inspirational spaces in the artist studios provided at ground floor level. The level of amenity is substantially more than a similarly located rental community in Dublin. It will feature more than double the level of staff to deliver the experience for residents and focus on ensuring enjoyment for long-term stay at Player Wills Shared Living.”



3. *Wind micro-climate study, including analysis of balconies and upper level roof gardens.*

A **Pedestrian Wind Comfort Report** prepared by IES Consulting accompanies this application under separate cover. Both design and landscape mitigation measures are proposed for sitting and standing comfort and this has been integrated into the proposed development.

Regarding walking comfort, the assessment demonstrates that the proposed development meets the relevant Lawson criteria for leisure and business walking. Accordingly, mitigation is not proposed.

Regarding safety criteria, the proposed development shows good compliance with the relevant Lawson criteria and mitigation is not proposed.

The proposed landscape design ensures there are no seating or gathering areas positioned within zones that were shown to be outside of the identified “comfortable” standing or sitting thresholds in all seasons including the proposed balconies. All other landscape zones where seating areas, gathering spaces or private terraces have been delineated are within the “Comfort threshold” as outlined within the **Pedestrian Wind Comfort Report** prepared by IES.

The landscape in general seeks to include as much vegetation as practically possible, incorporating hedges, trees and shrubs, to mitigate wind exposure within the public and private realm such as trellis, climbing plants and hedges to mitigate wind exposure while allowing light into the space.

Please refer to the following for details of the proposed landscaping incorporating mitigation measures:

- Landscape Design Statement prepared by Niall, Montgomery & Partners
- Drawing No. L1-501-503 – Landscape Plan

4. *A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ 2018, including its specific planning policy requirements.*

A **Housing Quality Audit** is submitted under separate cover and includes a schedule of accommodation. It demonstrates that the proposed development fully accords with the relevant design standards and specific planning policy requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ 2018. Please see the Planning Statement and Statement of Consistency prepared by MH Planning and submitted under separate cover for further detail.

5. *A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2018). The report should have regard to the long-term management and maintenance of the proposed development.*

A Building Lifecycle Report prepared by Aramark is included with this application under separate cover and addresses all matters set out above.

The Building Lifecycle Report has been developed on foot of the 2018 revised Sustainable Urban Housing: Design Standards for New Apartments (Guidelines for Planning Authorities) under Section 28 of the Planning and Development Act 2000 (as amended).

Within the new Guidelines, new guidance is being provided on build-to-rent. Section 6.13 of the Apartment Guidelines 2018 requires that apartment applications shall:

*“include a building lifecycle report which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of the residents.”*

The Building Lifecycle Report prepared comprises the Estate Management Report and Building Lifecycle Report. These reports have been provided to demonstrate how the requirements of Section 6.13 have been met, insofar as design detail has been finalised at this stage.

The reports explain the rationale for material and finishes layout along with common area layouts and estate management strategies; thereby reducing where possible costs for the benefit of the end user.

*6. A detailed phasing plan, including time of delivery of the central park and public open space.*

A detailed description of the phasing of the proposed development is included in the **Construction, Demolition, Environmental Management Plan** prepared by Garlands, which is submitted under separate cover. The phasing plan is appended to this report in Appendix B.

The proposed development includes the following public open space;

- i. ‘Players Park’ – connecting the Player Wills and Bailey Gibson sites
- ii. ‘St. Catherine’s Park’ – adjacent to St. Catherine’s National School
- iii. Courtyard in the former factory building ‘PW1’
- iv. Public plaza between proposed blocks PW4 and PW5.

The phasing plan envisages that commencement of works in August 2021. Building PW1, the former factory building would be completed in March 2024 and would incorporate the courtyard. This would be followed by completion of building PW2 and Players Park in parallel with an estimated completion timeframe of July 2024. The proposed St. Catherine’s Park would be delivered in parallel with building PW4 and by November 2024. Finally, the public plaza would be delivered with building PW5.

*7. Response to issues raised in Addendum B of Planning Authority Report, received 15th June 2020 and 17th June 2020, which includes the internal reports of the Parks Department, Roads and Traffic Department Section, and Water Services Planning Section.*

## **Landscape**

*DCC Recommendation: Public open space - All designated public open space will be provided with a safeguarding of public access and use. Taking in charge of public open space is to be agreed with DCC Parks.*

The proposed scheme sets out a clear hierarchy of private, communal, and public open space in a way that ensures all open spaces are well maintained. An **Outline Landscape Maintenance Proposal** is appended to the **Landscape Design Statement** prepared by Niall Montgomery & Partners. All public spaces have been designed in conjunction with Dublin City Council Parks Department.

A Taking in Charge drawing (PL1090) is included in the architectural suite of drawings that accompanies this application.

*DCC Recommendation: Central square: the provision indicates a broadly passive open space that is to be activated with programmed events. A permanent playground provision is provided. The ‘café terraces’ on either end will need to be supported by ground floor retail, and this should be indicated on the plans. The use of natural stone materials should be extensively used within the design.*

The café terraces at either end of the 'Players Park' are supported by ground floor retail. The entrances and exits to the ground floor retail are clearly marked on **Drawings: L1-501-503**. In addition, the Architect's floor plans for PW2 (**Drawing: PW2-PL1200**) show the ground floor use and layout.

Natural stone banding is to be used throughout the central 'Players Park' design as indicated on Landscape **Drawing: L1-501-503**.

*DCC Recommendation: Play park: The concept of children's play in the development should provide a larger destination playground in the central square as a community focus, including the components indicated in this play park and bring more active recreational facilities into this space with a possible location advantage near the school. Further discussions are required with DCC Parks on this issue.*

The strategy proposed is to provide a large destination play park (St. Catherine's Park) to the East of the site adjacent to the school. With a smaller play provision within the main park (Players Park) along with significant integrated play. This strategy has been discussed with DCC parks since opinion was received.

Public provision of play spaces is as follows:

- Dedicated play space to the north west of player's park: 142 sq.m
- Informal play integrated throughout Players park (In the form of landform, topography play, boulders, steppingstones, nature trail etc.)
- Play spaces within St. Catherine's Park: 370 sq.m (This location is where the bulk of the proposed development's play equipment is proposed.
- Informal play integrated throughout St. Catherine's park (In the form of landform, topography play, boulders, stepping-stones, nature trail etc.)

These spaces include secure play for younger children as well as more active play for older children. The layout and extent of these play facilities is shown in **Drawings: L1-501-503** as well as included in illustrations throughout the **Landscape Design Statement**.

*DCC Recommendation: 3.2 Streetscape: The overall design concepts are supported. Cross sections should be prepared indicating canopy growth over time so that suitable species and tree form are selected for the available space and tree surgery is minimised in future management. Sub-surface conditions and integration of services/utilities with tree pit design should be clarified at this stage between applicant's landscape architects and services engineers. Tree species for bio-retention/ Suds are to be considered with reference to actual implemented case studies. Back and arm rests shall be provided on 50% of all external seating. Covered bicycle stand areas shall be provided.*

Cross sections are included in the landscape suite of drawings as requested, see **Drawing Series L-800**. All species have been chosen with respect to minimising long term maintenance and avoiding removal. Illustrative sections depicting tree growth are shown in the "Streetscape" Section of the **Landscape Design Statement**.

The SUDs tree pit design has undergone extensive consultation with the DCC Parks Department and the Project Engineer (BMCE) and so the tree pit layout is coordinated with proposed underground utilities at this design stage. The tree pit system is a development of the SUDs and tree pits has been implemented successfully at Cherrywood, Dublin. Refer to BMCE's **Drawing no: C1251 Typical SuDS Details – Sheet 2** For technical section and the "Sustainable Urban Drainage" Section within the **Landscape Design Statement** for further information of the proposed system.

It is proposed that 50% of benches will have backs and arm rests and that 50% of the on-street bike parking will be covered.

*DCC Recommendation: 3.3 Courtyards: Review shadow analysis for final layout of elements.*

A **Daylight, Sunlight and Overshadowing Study** has been prepared by Integrated Environmental Solutions (IES) and is submitted under separate cover.

The results have been used to finalise placement of elements such as benches and trees in the courtyards to maximise the use of spaces which receive adequate sunlight.

*DCC Recommendation: Privacy planting strips shall be provided between all residential windows and public areas.*

All private terraces to the ground floor have been designed with a privacy planted strip in order to mitigate any potential residential amenity issues for future occupants.

*DCC Recommendation: For play areas please confirm area calculation provided in relationship to apartment guideline standards.*

The following guidance is outlined in the Design Standards for New Apartments Guidelines:

*Children's play needs around the apartment building should be catered for:*

- *Within the private open space associated with individual apartments;*
- *Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*
- *Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.*

The Apartment Guidelines state that: *Perimeter blocks with a central communal open space is particularly appropriate for children's play, especially if access from the street is controlled.*

Niall Montgomery Landscape Architects have measured the play spaces in the development having regard to the guidelines. The following dedicated play spaces occur within the private communal courtyard spaces (which as the guidelines suggest, are particularly suitable for children's play) and include equipment for toddlers and younger children as well as seating for parents/guardians and passive surveillance from the adjoining apartments:

- Dedicated Play space located in PW2 Courtyard in the form of a formal play space of 50 sq.m along with 35 sq.m of informal play elements distributed throughout the courtyard;
- Play space in PW4 Courtyard of 30 sq.m; and,
- Play space in PW5 Courtyard of 20 sq.m.

The following public play spaces are to be used by the existing community and new residents of the proposed development. These spaces also include secure play for younger children as well as more active play for older children. Along with:

- Dedicated play space to the north west of player's park: 142 sq.m
- 2 no. large play spaces within St. Catherine's Park: 370 sq.m (This location is where the bulk of the proposed development's play equipment is proposed).

As recommended in the Apartment Design Guidelines, much of the proposed landscape (both within the courtyards and the public realm) has integrated and informal play in the form of climbing boulders, topography, play sculptures, nature trails etc. These informal play elements are described in more detail in the **Landscape**

**Design Statement.** All play spaces are highlighted clearly in the landscape plans submitted under separate cover and are of a sufficient size that meet the requirements of the Apartment Guidelines.

*DCC Recommendation: 3.4 School site lands- Please confirm if a temporary landscape provision is required to be made in advance of development.*

The Applicant, together with the design team are currently consulting with community groups to determine the best use of this space. This space will be landscaped along with the adjoining proposed St. Catherine's Park and will appear as an extension to this park. The temporary park will broadly consist of native meadow planting and lawn with native tree planting in groups. As described within the **Landscape Design Statement** and shown on Landscape **Drawing no: L1-502**.

*DCC Recommendation: 3.5 Public Art: Parks and Landscape Services support the provision of quality public art within public open spaces and in particular the work of emerging artists. Provision for public art shall be made within the scheme and the Public Arts Office may be consulted on this aspect.*

The ground floor of PW1, the former factory building is designed as a community, arts and cultural hub for the area by incorporating artist and gallery facilities. It is anticipated that this hub in addition to the internal courtyard space will act as a centre point for public art as well as for work by local emerging artists. The Applicant is engaging with local community groups and art consultants to develop an art strategy for the site.

*DCC Recommendation: 3.6 Planting: Review use of toxic plant species and in particular avoid locations adjacent to play areas. Planting for biodiversity, including planting for pollinators and providing larger trees for canopy cover for birds and potentially bats shall be considered.*

There are no toxic plants proposed within the overall Landscape Design.

The proposed planting schedule has been developed in conjunction with the project Ecologist and Dublin City Council's Parks Department. The plants selected are both easy to maintain and resilient to the Irish climate. Many plants from the Ireland 2020 Pollinator Plan were chosen for inclusion in the plant palette. Plants were also chosen for the scale of planting and to respond to scale of space. Shade tolerant species have been chosen for the apartment block courtyards. Street Tree Species were chosen with guidance from DCC Parks due to their resilience to periodic drought and inundation as is the case with trees planted in SUDS tree pits.

*DCC Recommendation: 3.7 Biodiversity: The preparation of an Environmental Impact Assessment Report (EIAR) (as stated in the Environmental Report (ER)) for submission with the application is noted and required.*

An **Environmental Impact Assessment Report** has been prepared by the Design Team and is submitted under separate cover.

## **Traffic & Transport**

*DCC Recommendation: Additional details in relation to traffic and transport matters, having regard to the requirements of the Transportation Planning Division (report dates 11/06/2020) as indicated in the Planning Authority's Opinion.*

It should be noted that the Traffic & Transport consultants, SYSTRA, have engaged further with Dublin City Council to discuss the recommendations outlined in their report. These additional meetings took place, on July 16<sup>th</sup> & September 29<sup>th</sup>, 2020. The below outlines each recommendation of the DCC Transportation Planning Division report and the appropriate response.

*DCC Recommendation: 1. In respect of proposed junctions and works to public roads and footpaths, the design should be revised having regard to the following:*

*a. Any works proposed to the roads and public footpaths should be superimposed on an existing survey drawing to ensure full clarity of the proposed amends. All works are required to be designed in accordance with the Construction Standards for Roads and Street Works in Dublin City Council.*

The topographical survey has been included on drawings of external changes and improvements to the public road network and footpaths. This can be viewed in Drawing **SYS-PW-1.2**. All works will be designed in accordance with the Construction Standards for Roads and Street Works in Dublin City Council as requested.

*b. The applicant should provide a detailed junction design outlining the proposed kerb lines, road markings and boundary treatment for the development (fence, pillars etc.) for both the Donore Avenue and South Circular Road priority junctions in order to allow for a full assessment.*

More detailed drawings of the external junctions were submitted to DCC for consideration, along with the design intent and proposed changes which were also presented and discussed with DCC in an additional consultation meeting held since the issue of their report. Additional comments were provided by Dublin City Council at this meeting based on the proposed design which were subsequently incorporated in the final design as submitted with this application. This included relocation of pedestrian crossing, road signs and the provision of flexible bollards. The final design for both junctions are included in drawing no. **SYS-PW-1.2**.

*c. The provision of pedestrian priority across both access and exit points on Donore Avenue and South Circular Road should be considered.*

These have been provided and the location and design presented to and agreed with DCC.

*d. The pedestrian access point at the south side of the Donore Avenue entrance is shown at a right angle. The southern point of the access point should be widened slightly and rounded to allow ease of movement for pedestrians travelling from the development walking southbound on Donore Avenue and vice versa.*

The corner at this location has been rounded based on DCC recommendations, the footpaths widened and the internal street parking set back further from the junction all with the intent of increased ease of access for pedestrians. These revisions were presented to and agreed with DCC.

*e. The footpath located on the south side of the access road linking the proposed development and Donore Avenue appears to narrow from 2.5m to 2.0m approaching Donore Avenue. In light of the footpath being a key walking and scooting route to the primary school on Donore Avenue consideration should be given to maintaining the 2.5m width.*

The road at this location has been adjusted slightly northwards to provide a wider footpath of 2.5m at this location. This solution was presented to and agreed with DCC. As outlined above the street parking was also moved further away from the Donore Avenue external junction to improve ease of access for pedestrians along this link road.

*f. Visibility for drives exiting the development onto South Circular Road will have limited visibility to pedestrians traveling westbound on the footpath due to the presence of an existing boundary wall. The applicant should review the pedestrian movement on South Circular Road and implement improved visibility or protected buildouts to allow for greater visibility of pedestrians.*

The footpath has been built out further from the boundary wall to ensure any waiting crossing pedestrians are visible to traffic exiting the development onto South Circular Road. The revised design was presented to and agreed with DCC. The final design can be viewed in drawing **SYS-PW-1.2**.

*g. The suitability of the proposed loading bay on South Circular Road, a bus corridor should be reviewed. Servicing of the development should be provided from within the internal road network.*

This loading bay has been relocated within the development. Please refer to the **Traffic and Transport Assessment** prepared by Systra and accompanying drawings for details on the proposed location of the loading bay to serve the development.

*h. The proposed cycle stand located on South Circular Road should be relocated so as not to obstruct pedestrians on the public footpath.*

This has been relocated and the proposed landscaping reviewed to ensure the public footpath is not blocked at any point with or without bikes parked at the stands.

*Consultation with the Transportation Planning Division will be required for works proposed to the public carriageway and footpaths, in particular South Circular Road and Donore Avenue in advance of requesting a letter of consent and lodging an application.*

As detailed previously additional consultation has been undertaken with the council on all matters raised including the design of the junction mentioned above with the revised designs presented to DCC for further comment and refinement.

*DCC Recommendation: 2. The internal site layout and design proposed should be revised to include the following items:*

*a. The location and type of uncontrolled crossings on the main arterial streets within the development are not clear from the drawings submitted. The drawings should be updated to clearly show the uncontrolled pedestrian crossing points and also indicate clearly the raised road surface.*

The location and type of crossings has been made clearly on the drawings and can be seen in drawing SYS-PW-2 along with area of raised shared surface. The amendments to the drawings and location of crossing were presented to DCC in the further consultation meetings.

*b. It is not clear from the drawings how the basement access road ties into the internal road network and how pedestrian movement across the access road is managed.*

The drawings have been revised to provide more clarity to the proposed arrangements with revisions made to the surface treatment of the basement access road. The revised arrangement was also explained and discussed with DCC.

*c. A review of pedestrian desire lines within the development should be carried out as it is noted that a number of desire lines from various blocks within the development are restricted due to the presence of on-street car parking. A review of proposed cycle stands and their impact on desire lines should also be carried out.*

A review of all desire lines has been undertaken which has resulted in the relocation of some cycle stands and the removal of a number of on-street parking spaces, particularly between blocks PW1 & PW2. These changes have improved the permeability for pedestrians along key desire lines. Crossings have also been provided along the main desire lines through the development.

*d. The applicant is requested to clarify if the street between PW1 and PW5 which leads onto the South Circular Road is one-way. The applicant is requested to explore the feasibility of a contra-flow cycle lane on a potential one-way street between blocks PW1 and PW5 to allow access for cyclists from South Circular Road. An uncontrolled pedestrian crossing or raised table etc. is also required on the street before the footpath on the eastern side of the street narrows and terminates as it approaches South Circular Road.*

This street is one-way which was clarified with DCC is presented in greater detail on the final drawings submitted. The contra-flow cycle lane has been provided with the design presented to and agreed with DCC. A crossing has also been provided prior to the street narrowing on the eastern side as per DCC's recommendation.

*e. A number of the access routes to bike stores appear unnecessarily convoluted and should be reviewed to enhance the provision of direct access relevant to the internal road network and the block the bike store serves. It is also not clear what provision, if any, is made for cyclists to use the basement ramp to access the various bike stores.*

The access routes of concern were clarified with DCC, based on this the route from PW1 to the basement lift was improved through the removal of on street parking between the blocks. This provides improved access to residents of PW1 whose bike parking will be located in the basement of PW2. This solution was presented to and agreed with DCC.

*f. Electrical charging points or future proofing to serve significantly more on-street parking spaces than the 1 no. proposed should be considered.*

Future proofing for future installation of on-street electric charging points will be provided at a further 3 spaces as discussed with DCC.

*g. It should be clarified whether the proposed staff cycle spaces are included in the total residential figure quoted and if they are to be physically separated from residence cycle stores. Shower and changing facilities shall be provided.*

There is a total of 23 cycle spaces provided separately to the residential cycle space total. 20 of these, for general staff on site, will be located at basement level and marked for staff only. 3 spaces will be located within PW4 for staff of creche. Showers and changing facilities will be provided with PW1 for general staff on site and within the creche for its staff.

*h. The applicant is request to provide further details regarding future linkage of internal masterplan streets and submit filter permeability proposals/details.*

This was clarified with DCC in further consultation including the planned linkage to Bailey Gibson, and the proposals within the masterplan for optional filtered permeability on the internal street network of the DCC lands to which the subject site will link to.

*DCC Recommendation: 3. A review of the 'taken in charge' areas should be carried out to ensure the boundary between private and public areas are apparent and follow physical boundaries (building lines/kerb lines etc.) in order to facilitate the management of both areas. It should be noted any proposed loading / drop-off spaces are likely to be marked as double yellow if taken-in-charge. It was noted that a number of doors into the proposed blocks are outward opening. Outward opening doors onto the public footpath/taken in charge area is not permitted unless it is an emergency exit. A number of 'Home*



*Zone' streets are noted, this will require further consultation with Roads Maintenance and taken in charge requirements.*

The boundary between public and private lands will be delineated through steel spotters embedded in the pavements to facilitate the separate management of these areas. The applicant accepts that areas taken in charges will be road marked accordingly. The accesses to and doors to the development have been reviewed to ensure the areas utilised is managed privately along with any building overhangs or areas over basement. The material choices for the Homes Zones is compliant with the material palette outlined in the DCC construction standards. Long-stay residential parking has also been removed from these home zones based on recommendation from DCC in relation to taking in charge arrangements.

*DCC Recommendation: 4. Clarification is required in respect of service including refuse access arrangements:*

*a. Outline refuse collection and service arrangements for residential and commercial uses should be clarified for the development and the potential impact upon the public realm.*

The service arrangements are detailed within Section 5.10 of the report and within drawings SYS-PW-5.1 & SYS-PW-5.2. The bins on-street are shown within the drawings along with impact upon the public realm. As shown in the drawing any pinch points are above 1.8m, the minimum requirement. It should also be noted that bins will only be on street immediately prior to collection.

*b. It also not clear if the refuse vehicle can carry out a U-turn within the development to exit the site on South Circular Road following completion of refuse collection at points between block PW1 and PW2.*

This road will connect to the adjacent Bailey Gibson site internal road network which is under the ownership of the applicant and has been granted planning permission. Therefore, no u-turn will be required.

*c. Outline Service and Waste Management Plan for the development.*

An **Operational Waste Management Plan** has been prepared by Byrne Environmental Consulting and is submitted under separate cover.

*DCC Recommendation: 5. The assessment of traffic impacts during the demolition and construction phases, should be included in the assessment having regard to both HGV and other related construction traffic. The assessment should considered the most onerous phase, but also the extent of the impact having regard to the full construction phase. Construction vehicular access points and traffic routes should be reviewed and potential impacts assessed. A cumulative assessment considering the masterplan area and any other nearby committed construction sites should be carried out if relevant. In particular, any proposed joint construction access arrangements will require consideration. Necessary mitigation measures to alleviate identified impacts and other traffic management mitigation measures should be identified and form the basis for a CTMP framework.*

A **Construction Traffic Management Plan** prepared by Systra is submitted with this application. This report clearly addresses the expected traffic generation impacts during each construction phase including the most onerous phase during basement excavation, this includes both light and heavy vehicles. Details of the proposed routing of heavy vehicles to and from the site have been included as well as details of on-site parking arrangements for light vehicles and bicycles. The report also considers the combined cumulative impact of the

construction of adjacent sites. Access arrangements for phase of construction are clearly identified within the report. Details of necessary mitigation measures are provided.

*DCC Recommendation: 6. It should be noted that cycle parking for construction staff shall be kept secure and accessible. A key/fob access should be required to bicycle compounds and cycle parking shall allow both wheel and frame be locked to the parking stand. Construction staff should also be provided with changing and shower facilities.*

Changing and drying facilities are proposed for construction staff and detailed in the **Construction, Demolition Environmental Management Plan** and **Construction Traffic Management Plan** provided with the application.

Secure bike parking will be provided for construction staff as detailed in the **Construction Traffic Management Plan**.

### **Drainage**

*DCC Recommendation: Surface Water Management strategy for proposed Player Wills Play Park - Clarification on the reasoning to locate attenuation storage to serve the private Player Wills development in the proposed public park, rather than within the private development area?*

*Details of the proposed maintenance management strategy for the proposed attenuation storage shall also to be provided.*

Further consultation with DCC's drainage planning department has resulted in the removal of the proposed attenuation storage beneath the public park. The stormwater from each block is now proposed to be attenuated within each block individually prior to discharge to the drainage network within the road.

As the attenuation storage is now to be located to within the privately maintained space of each individual building block, the maintenance responsibility shall remain with the developer.

*DCC Recommendation: Surface Water Management strategy for proposed Central Park - Clarification on reasoning for proposing an interim solution for managing surface water runoff which would result in a significant discharge to the public surface water network on Donore Avenue rather than providing permanent attenuation storage in the proposed park providing surface water management at source.*

*Details of the existing surface water discharges to Donore Avenue shall be provided.*

The high rate of surface water discharge from the proposed 'Players Park' was due in large part to the inclusion of the southern east-west road into the stormwater calculations here. Further consultation with DCC's drainage planning department has resulted in the removal of this road from the park drainage network. This will now be connected to the main surface water drainage network within the Player Wills site road network. It has been clarified in the submitted infrastructure report that all soft landscaped areas in the park will discharge to ground. Likewise, hard landscaped zones shall discharge to filter strips beneath and adjacent to the hard landscaping, maintaining the existing surface area for surface water infiltration to ground. Only high-level overflows from land drains in the park will connect to the stormwater drainage network to prevent water ponding on hard landscaping in high intensity rainfall events. The drainage from the Players Park will still connect to the outfall drain from the adjacent Bailey Gibson development which passes through that park. In accordance with the masterplan drainage strategy, the stormwater from both of these areas will finally discharge to the attenuation tank to be constructed to the north of the proposed municipal playing pitch, but in the interim, will discharge to the public stormwater culvert in Donore Avenue.

There is no direct connection of surface water from the development to the stormwater culvert in Donore Avenue. As outlined in the infrastructure report, the majority of stormwater from site currently discharges to the combined sewers in both the South Circular Road and Donore Avenue. The proposed development will eliminate all surface water discharge from the site to the combined sewers.

*DCC Recommendation: Provision of 2-stage surface water treatment process for proposed Player Wills Buildings and private hardstanding areas – Clarification on the 2-staged surface water treatment process that will be provided for the proposed Buildings and private hardstanding area prior to discharge to attenuation structure.*

All roofs shall be green roofs/terraces (either intensive or extensive), providing both interception storage and filtration of stormwater. In storm events with rainfall volumes exceeding the capacity of the roof interception storage, stormwater will drain to the attenuation storage for each individual block prior to discharge to the main street drainage network.

All private hard landscaped areas at grade will with discharge to tree pits or filter strips to allow for filtration, interception and attenuation of stormwater. Due to the low permeability clays on this site, these elements shall be connected to the main drainage network which shall drain to the attenuation storage for each individual block prior to discharge to the main street drainage network.

## **2.6 Statement of Plan Objectives relating to possible Material Contravention of Relevant Development or Local Area Plans**

*Where the applicant consider that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.*

A **Material Contravention Statement** has been prepared by McCutcheon Halley Chartered Planning Consultants which sets out the rationale as to why the development, which exceeds the height standards set out in the Dublin City Development Plan 2016-2022, is considered acceptable.

### 3 Notification of Statutory Bodies

*Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:*

- 1. Irish Water*
- 2. Transport Infrastructure Ireland*
- 3. National Transport Authority*
- 4. Department of Culture, Heritage and the Gaeltacht*
- 5. Heritage Council*
- 6. An Taisce*
- 7. Department of Education and Skills*
- 8. Coras Iompair Eireann*
- 9. Dublin City Childcare Committee*

It is confirmed that each of the bodies above have been notified of the making of this application for permission and in this regard a hardcopy of the application together with a soft copy has been sent to each listed body.