

March 2021

Statement of Response to An Bord Pleanála Pre-Application Consultation Opinion



**Proposed Strategic Housing Development
Lands at Auburn House (Protected Structure),
Little Auburn and Streamstown off the
R107 Malahide Road/Dublin Road
and Carey's Lane,
Malahide, Co. Dublin**

Applicant: Kinwest Ltd.



Table of Contents

1.0	Introduction	2
2.0	Specific Information to be Submitted with the Planning Application	3
2.1	Item No. 1 – Relationship to Dublin Road	3
2.2	Item No. 2 – Relationship to Existing Avenue	6
2.3	Item No. 3 – Views to and from Auburn House	8
2.4	Item No. 4 – Auburn House & Conservation	14
2.5	Item No. 5 – Existing Trees and Woodlands	16
2.6	Item No. 6 – Flood Risk Assessment	17
2.7	Item No. 7 – Daylighting Assessment.....	18
2.8	Item No. 8 – Traffic, Transportation & Parking	19
2.9	Item No. 9 – Public and Communal Open Spaces	20
3.0	Notification of Authorities	21
5.0	Conclusion.....	22

1.0 Introduction

This **Statement of Response**, prepared by Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on lands at Auburn House (Protected Structure), Little Auburn and Streamstown off the R107 Malahide Road/Dublin Road and Carey's Lane, Malahide, Co. Dublin.

Following consultation with Fingal County Council under Section 247 of the Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted on 16th July 2020, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request in October 2021. The pre-application consultation meeting was then held remotely via Microsoft Teams on 17th November 2020. This meeting included representatives from An Bord Pleanála, Fingal County Council, the applicant and their design team.

On 11th December 2020, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-307610-20.

Having regard to the above, the opinion states that An Bord Pleanála *“has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.”*

The opinion further states 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,”* which is summarised as follows:

1. Relationship of the proposed development with the Dublin Road;
2. Relationship between the proposed development and the existing entrance avenue;
3. Definition of the views and visual corridors to / from Auburn House;
4. The treatment of Auburn House and associated structures, including the walled garden. Documents, including a detailed Conservation Methodology, should clearly identify the extent of the landholding to be retained with Auburn House and the relationship of this protected structure with the proposed development;
5. Elaboration of the documents as they relate to the treatment of existing trees and woodland on the site;
6. Elaboration of the documents as they relate to the risk of flooding. A revised Site-Specific Flood Risk Assessment should be submitted;
7. Elaboration of the documents as they relate to the design and layout of open space across the site, clearly identifying and defining public, private and communal spaces.

This statement now sets out a response to An Bord Pleanála's pre-application consultation opinion. This statement of response should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application.

2.0 Specific Information to be Submitted with the Planning Application

2.1 Item No. 1 – Relationship to Dublin Road

ABP Opinion

“Further elaboration and clarification of the relationship of the proposed development with the Dublin Road in the context of the development plan objectives to protect the character of this approach to Malahide. Such elaboration should consider the extent and treatment of open space and mature trees along this road frontage”.

Applicant’s Response

The applicant and design team note that there are objectives contained within the Fingal County Development Plan 2017-2023 seeking to protect the character of the approach of the road into Malahide. Objective Malahide 2 seeks to:

“Retain the impressive tree-lined approach along Dublin Road as an important visual element to the town and, specifically, ensure the protection of the mature trees along the Malahide Road at the Limestone Field and property boundary walls which create a special character to the immediate approach to Malahide”.

In this regard, the entry to Malahide is signalled by the increasing enclosure of trees as the road meets the outer edges of Malahide Castle Demesne and gently curves around the estate walls into the final approach into the town. The road along the demesne edge is well planted on each side and forms a memorable image of place and season. The arrival to Malahide starts here in the vicinity of Auburn. The applicant and design team agree that this tree lined approach is an important place marker for Malahide and adds to the character and context of the area. In light of this, the proposed development has always sought to retain the character of this tree lined approach and to integrate it into the design of the proposed development.

The processional route into Malahide is a sequential experience, one of forward vision and movement along a gently serpentine tree lined route. Glimpses either side are fleeting. Auburn is located at the south western gate to the Malahide Demesne, at the junction of Back Road. It has a relatively narrow frontage which forms a neck to a larger site within. There is a band of mature trees, approximately 20 metres deep, along the edge of the road. There are no views into the site itself. Trees within the site form the backdrop of views at the end on Back Road as it joins Malahide Road/Dublin Road (R107). There are bus stops either side of the road at the entrance.



Fig. 1 – View 21 from 3D Design Bureau’s verified views showing existing view (without development) from Dublin Road.



Fig. 2 – View 21 from 3D Design Bureau’s verified views showing proposed development from Dublin Road.

The tree lined processional route into Malahide will as a result be unaffected by the proposed development as changes to the edge conditions (i.e., tree and boundary) will be so minimal. The

buildings within are set back over 100 metres from the gate and generally 50 metres – 55 metres set back from the boundary behind the preserved band of mature trees.

Concern was expressed by the Planning Authority that the buildings would be seen from the road. The photomontages submitted with the planning application and forming part of the Visual Impact Assessment section of the EIA demonstrate this not to be the case.

It is noted that no trees are proposed to be removed along this boundary in order to facilitate the proposed development. Only 'U' Category trees are being removed from this location and that is for woodland management purposes only and not for development purposes.

There was also concern regarding the informal building line of existing houses recessed behind the trees. In response to this, the building line has been further set back to meet the established recessed building line and the proposed buildings forming the south-eastern edge to Malahide Road/Dublin Road have been reduced in scale to a mix of 2 and 3 floors.

The Visual Impact Assessment (VIA) from Back Road shows that the development is low and that the buildings are in effect hidden by the under storey planting barely higher than the bus stop (please refer to Fig 1 and 2 above). In the event of the eventual loss over time of some of the over mature specimen trees; the buildings will remain out of sight. There are two bus stops, one each side of the road, at the entrance. While the proposal is shown screened, it would be possible with a short gap in the under storey to have glimpse views to the bus stops for passive surveillance without such sight lines being apparent in the forward views while passing on the road.

The Board are also invited to refer to the Architects Design Report (prepared by CCK Architects & Urban Designers), which is submitted under separate cover as part of this application, where the Malahide Road/Dublin Road interface is discussed, to the verified views prepared by 3D Design Bureau, and to site cross sections which show the building in relation to both the mature trees and the Malahide Road/Dublin Road boundary.

There is a significant amenity open space located between the buildings and the road. This contains the existing stand of mature beech and other trees and is seen against the backdrop of the demesne. This tree stand will be managed in accordance with woodland management plan and renewed over the long term. The space has good sunny orientation and will serve as an informal amenity area for the residents and the crèche. The Board are also invited to refer to the TBS Landscape Architects documentation for further detail, which is submitted under separate cover as part of this planning application.

Downey Planning notes that the views from Visual Impact Assessment (VIA) were taken during the winter season where foliage and vegetation cover is at its lowest. It is noted that foliage and vegetation cover will increase during the summer season. For further information on the protection of the tree and woodland setting of Auburn, please refer to the arboricultural report and associated drawings prepared by The Tree File Ltd.



Fig. 3 – Section A-A taken from TBS Drawing No. 1489-301 (Dublin Road to right).

It is respectfully considered that the revised layout, which has been prepared since the Tripartite Pre-Application Consultation with An Bord Pleanála, further respects the existing building line and tree lined approach at this part of the Dublin Road.

2.2 Item No. 2 – Relationship to Existing Avenue

ABP Opinion

“Further elaboration and clarification of the documents as they relate to the relationship between the proposed development and the existing entrance avenue. Such elaboration and clarification should include additional section drawings and visual analysis illustrating this relationship”.

Applicant's Response

The historic entrance into Auburn leads along a tree lined avenue approximately 25 metres or more wide planted on both sides and bounded by a small stream along its southern edge. It is a linear experience of movement and forward view always contained by trees. After about 200m it bends left and crosses a stone bridge over a small stream and continues with woodland along the southern side, the stone walls of courtyards are visible to the left and an indented paddock, part of the front field, comes into view on the right. The house remains out of sight behind trees.

The avenue arrives at Auburn House from the south east and then to the east front where there is a large gravel forecourt. The house commands a view over the front field. The avenue is to be preserved as a greenway in the proposed development. The applicant's purchase of the modern bungalow site 'Little Auburn' has enabled this as the main access is now located to the north following outside the treeline and leaving a zone 40m to 50m deep between the proposed building line and the southern boundary of the site.

Fingal County Council expressed concern about the scale and type of the apartment blocks in 'Little Auburn' which is outside of the original avenue, but adjacent. The concern was expressed that while

the density proposed on the site was appropriate, it should be weighted more to the north-west and south-west quadrants of the site. The concern was that Blocks 4 and 5 would alter the character and sense of place of the avenue.

In response to these concerns, alterations were made to this area as follows:

- (i) The buildings were set back further from Dublin Road as described previously.
- (ii) The length of the built edge parallel to the avenue was shortened.
- (iii) Block 4 was reduced in height.
- (iv) There is a reduction in the number of apartments in this area compared to what was submitted at the Tripartite Pre-Application Consultation with An Bord Pleanála.

Block 4 is set back over 100m from the entrance to the avenue from Dublin Road, so the apartments do not impinge on the sense of arrival into the site. The new access road serving the site, and which these blocks face on their western elevation, is located outside of the root protection areas of the avenue trees. These trees range in height from around 15m with senior specimens at 18m to 21m. Block 4 has a three-storey shoulder height 9.5m rising to four floors at 12.7m for most of Block 5. There is a setback penthouse floor on most of Block 5 and part of Block 4.

The apartment buildings on the site are all located in the vicinity of large trees to make them subservient to the landscape context. In the case of the avenue, the building shoulder height is approximately two thirds of the height of the tree canopy. The Board are respectfully invited to refer to the site section drawings prepared by CCK Architects & Urban Designers for further detail.

The existing views along the old avenue are maintained. The view on the avenue is a contained forward perspective of trees and the new buildings do not impact on this. The understorey on the northern side hides the new road, traffic etc. and localised glimpses at right angles to the route allow discrete passive security of the avenue from the apartments, this being essential for safety and to avoid anti-social activity.



Fig. 4 – Existing and Proposed view along Avenue (Source: Verified View No. 33 by 3D Design Bureau)



Fig. 5 – Existing and Proposed view along Avenue (Source: Verified View No. 34 by 3D Design Bureau)

The Board are respectfully invited to refer to the 3DDB visualisation documents for full size visualisations. The scale and nature of the development here is sensitive to its location. It is well within the existing tree canopy height with a shoulder level ranging from three to four storeys. It is set back from sensitive boundaries and it is demonstrated that it is not visually intrusive from the old avenue, its approach, or the Dublin Road.

Please also refer to the Avenue Character Area in the Architects' Report (prepared by CCK Architects & Urban Designers) for a full description of the buildings, and the relationship of the proposed development to the original Auburn avenue.

2.3 Item No. 3 – Views to and from Auburn House

ABP Opinion

“Further elaboration and consideration of the documents as they relate to the definition of the views and visual corridors to / from Auburn House, which are identified for retention in the county development plan. Such analysis should proceed to assess and / or justify the impact of the proposed development on the defined visual corridor and on the landscape setting of this protected structure”.

Applicant's Response

The Fingal County Development Plan 2017-2023 has an objective for a masterplan for the Streamstown area (MP 9.A). Much of the masterplan area has already been built out, and the current application site comprises virtually all of the balance. One of the Development Plan Objectives for the Masterplan states the following:

“Retain visual corridors to/from Auburn House through the establishment of a visual buffer to the east of Auburn House”.

Streamstown Local Area Plan 2009 was made for a very different context as the land was then zoned with a density cap of 10 units per hectare. While it has since expired and no longer applies, it had the following to say with regard to landscape character and views:

“There are no notable views from the site given the existing planting, the low lying nature of the land and existing properties, both within and adjacent to the site. As a result, the area is considered to have an enclosed character” (4.3. Landscape Character and Views).

The area in front of the Auburn House was considered to be a sensitive development area and development here ‘should be well screened by natural planting. Additional planting of native tree species will be required in certain locations to achieve this. Along the visual corridor mature planting should be used. Earth berms should also be used to screen elements that would be visible from sensitive areas’.

The LAP went on to state that:

“A Sensitive Development Area has been identified in the Northern Character Area, located to the east of Auburn House. ...This area shall provide development sympathetic to the design of Auburn House”.

The design of this area, as shown on the Indicative Masterplan, is expected to be in a courtyard-type arrangement and may comprise a mews-style development, of a scale subservient to Auburn House. Low-key roads access is to be provided, including the use of shared surfaces.

The sensitive development area includes a significant parcel of land to the front (east) elevation of Auburn House which is to be retained as green space in order to provide a visual buffer, thus retaining views to and from the house.

The design response submitted as part of this Strategic Housing Development application has taken on board in response to Fingal County Council’s Opinion with regard to reducing the sizes and orientation of some courtyard clusters and particularly to opening a visual gap and extending the view corridor to the eastern site boundary.

This area has the lowest local density in the proposal with two storey narrow gabled courtyard buildings with occasional two and a half or three storey elements to allow informal compositions typical of vernacular estate courtyards.



Fig. 6 – Previously submitted layout at Pre-Application Consultation with ABP (Source: CCK Architects & Urban Designers)



Fig. 7 – Final Site Layout submitted at application stage (Source: CCK Architects & Urban Designers)

The visual buffer and view corridors to and from Auburn House and setting are arranged as follows:

- Firstly, there is a development free zone c.75m deep in a 180' arc around the front of the house. This view is cradled in two arms of tree planting encircling the house from the woods behind.
- Secondly, there is a large paddock or front lawn preserved in front of the house. It extends out c.140m from the house in a generous view cone shape, c.120m at it widest.
- Thirdly, there is a generous gap where the view extends further through another open space to the site boundary some 220m from the house bringing c.75m of boundary planting into view.



Fig. 8 – CGI view of front lawn looking from the south east (Source: 3D Design Bureau)

This defines a foreground view around the house edged in trees, a middle-distance view down onto the front lawn where gentle berms and extensive tree planting define the outer edges as anticipated in the earlier LAP. The backdrop is then the distant line of old boundary planting. This forms a 220m visual corridor to the boundary and a layering of the vista.

There were no views directly towards the house other than from within the existing front paddock. Such views are proposed to be enjoyed from the front lawn as a new public open space. The view from the avenue is currently hidden until the house comes into view from the south as the route emerges from the trees. This sequence will not change.

The buildings around the front paddock take their cue from traditional estate courtyards. They are simple vernacular forms with narrow gables making a continuous low-rise frontage of buildings and enclosing walls, creating a distinct sense of a discrete outer skin, and a hidden world within. The houses themselves are generally L shaped courtyard houses opening onto private patio gardens, which in turn open into a shared courtyard garden in the centre, with one or more discrete gates linking back out to the parkland. Car parking is kept away from the central paddock view and dispersed unobtrusively.



Fig. 9 – Proposed CGI view of lawn to front of Auburn House from pedestrian approach (Source: 3D Design Bureau)



Fig. 10 – Proposed view of front lawn from Auburn House (Source: verified view no. 7 by 3D Design Bureau)



Fig. 11 – View of Auburn House from front lawn, looking west (Source: verified view no. 37 by 3D Design Bureau)

Planted berms contain the forward view to the housing at the eastern end, while a lighter filigree of planting, viewed obliquely, shield the two sides.

Auburn House stands above the paddock, with the edge marked by a defined grass slope dropping by approximately 1.5m. This motif has been used to define the paddock on its other sides where gentle wildflower slopes with mixed tree planting define the edges, occasionally rising to form a berm. This allows the seamless accommodation of attenuation when required.

The access to the courtyards is mainly of short, shared surface green streets/shared driveways generally serving 3 to 5 houses. These are 4.8m wide with 1.5m concrete band and the balance in concrete grasscrete paving and a flush outer kerb. The overall effect is to naturalise the access, slow the driver, and to allow the landscape setting to dominate.

The courtyard clusters by their scale, form, historic reference and landscape setting will be clearly subservient to Auburn House.

2.4 Item No. 4 – Auburn House & Conservation

“Further clarification and elaboration of the documents as they relate to the treatment of Auburn House and associated structures, including the walled garden. Documents, including a detailed Conservation Methodology, should clearly identify the extent of the landholding to be retained with Auburn House and the relationship

of this protected structure with the proposed development, particularly with the proposed rear / western stable dwellings. The extent of ABP- 307610-20 Inspector's Report Page 28 of 30 works and intervention in the walled garden should be clearly identified, along with measures to protect the integrity of structures on the site".

Applicant's Response

A detailed *Architectural Assessment/Conservation Report* is enclosed with the planning application, prepared by Sheehan & Barry Conservation Architects. This *Assessment* includes surveys and justification for treatment of Auburn House and associated structures. This *Assessment* also includes a specific assessment of the Protected Structure and its curtilage structures, attendant grounds and its overall setting which can be summarised as follows:

The main house is to be retained and restored as a single dwelling and the results of the assessment states that,

"This is clearly the least impactful possible use. If works are required to maintain and refurbish the house, this should be subject to the normal guidelines of good conservation practice. Where and if any alterations are proposed in the future then the local authority should be consulted to determine whether such works fall within the threshold of Section 57 or Section 5 works or where more significant alterations might be proposed then a separate and specific planning application would be required.

However, as the present proposal is to retain the house in single residential use, this must be regarded as a positive conservation impact."

Further information on the retention of the main house as a single dwelling is provided for in the enclosed Assessment.

Downey Planning notes that result of the assessment concludes that the conversion of the buildings into four dwellings does not overwhelm the present buildings in terms of scale or large additions. The assessment states that,

"It retains the key conservation elements and character of the most important design elements i.e., the picturesque treatment of the elevations within the yards. It conserves the materials and finishes. There is a clear change of character from the historic use of the buildings for coach house use and equestrian use to residential use. The conservation impacts, in the context of the zoning of these lands for residential use may be reasonably seen as neutral in terms of the conservation impacts on these curtilage structures".

It is noted that Fingal County Council's planning report at the Pre-Application Consultation with An Bord Pleanála noted some concern with regard to the two duplex buildings that were previously proposed within the walled garden. These have now been omitted from the application and only a

residents' community facility is now included. This is at the southern end of the garden and shields the view of an unsightly and dominating side gable in the adjacent housing built close to the boundary.

The walled garden is to be largely retained as the vehicular entrance between Blocks 3 and 4 and is the only significant intervention into the wall itself. The character of the walled garden is modestly altered by this intervention and the provision of a new community building for use as part of the overall ancillary residential facilities, and in that sense can reasonably be characterized as a modest change of character in conservation terms. However, with careful design, landscaping and respect for the context, those negative impacts should be mitigated.

Regarding the construction of residential units within the lands forming the present grounds of Auburn House, the proposed development has been concentrated on those lands within the Auburn estate which will have least visual or character impacts on the setting of the main house and stable yard. The proposals have taken care to provide for a lower scale of impact, in the context of the residential zoning. Subject to the detailed design of boundaries and the careful management of existing and new woodland planting (which are covered under separate special reports and designs), the setting and landscape character of the principal Protected Structure can be maintained.

Further information on the surveys and justification for treatment of Auburn House and associated structures, is outlined in greater detail in the Architectural Assessment/Conservation Report, prepared by Sheehan and Barry Conservation Architects and also the Auburn House Walled Garden Condition and Repair Report, prepared by CORA Consulting Engineers.

2.5 Item No. 5 – Existing Trees and Woodlands

“Further consideration and/or elaboration of the documents as they relate to the treatment of existing trees and woodland on the site, to include maps and drawings providing clarity regarding:

- *Trees to be retained and / or removed and the condition of such trees.*
- *The rationale for removal – i.e. whether due to condition or development impacts.*
- *The nature, extent and phasing of planting to be provided across the site.*

A detailed woodland management plan should be provided which should identify specific measure and actions to ensure the long-term maintenance and protection of trees and woodland on the site. Responsibility for implementation of such plan should also be identified.”

Applicant's Response

A detailed tree survey has been carried out by Andy Worsnop of The Tree File Ltd Consulting Arborists and coordinated with TBS Landscape Architects. This, and the woodland management plan that emerged from it, informed the design process from the outset.

This report provides an accurate representation of the arboricultural implications of the proposed development on Auburn House and adjoining lands, tree population. The required development densities and essential modern standards of engineering and infrastructure to adequately service such residential development, means a large proportion of the available site space will be converted or disturbed to some extent. Fortunately, the site's inclusion of many broadly open spaces in the form of fields and lawns has greatly facilitated development and has allowed for the development of a scheme that is broadly sympathetic with the existing landscape and in a manner that limits tree loss. The major woodland and tree features associated with the Auburn demesne including the main woodland to the rear of the house, the belt associated with the entrance drive and much of the belt associated with the Dublin Road boundary of the site can be retained.

The full impacts of the development proposals have been illustrated graphically on the "impacts" drawing "Auburn Tree Impact Plan" (NE, NW, SE, and SW) where trees to be lost are indicated using broken pink crown outlines.

A specific tree protection program is outlined in the "Arboricultural Method Statement" at "Appendix 2" to this report. This outlines by map and text, the various procedures and methodologies involved in conserving the existing tree population and particularly, defines the areas of the site that will be separated from construction related works by the provision of "construction exclusion fencing", to be erected prior to the commencement of any site works.

The Board are invited to refer to the detailed report and documentation submitted by the Arborist and to Landscape Architect's documentation, for a full response to this item.

2.6 Item No. 6 – Flood Risk Assessment

ABP Opinion

"Further consideration and elaboration of the documents as they relate to the risk of flooding. A revised Site-Specific Flood Risk Assessment should be submitted having regard to the issues raised in the planning authority Water Services report, dated 07/08/2020".

Applicant's Response

Waterman Moylan Consulting Engineers & JBA Consulting Engineers have addressed this response within their Engineering Pack, which the Board are invited to refer to. An updated site-specific flood risk assessment has also been prepared and is submitted as part of the application. It is noted that the proposed development has been designed in accordance with the requirements of Fingal County Council in respect of further modelling clearly identifying flood extents and depths (section 6.1 of the Council's Opinion).

The conclusion of the Flood Risk Assessment is that there is no identified flood risk within the site or as a result of the proposed development.

"the various sources of flooding have been reviewed, and the risk of flooding from each source has been assessed. Where necessary, mitigation measures have been proposed.

As a result of the proposed mitigation measures, the residual risk of flooding from any source is low”.

Nonetheless, consultation with Fingal County Council indicated that if additional out of bank storage could be accommodated, that would have a potentially beneficial effect on sites downstream of the site.

This has been accommodated as a landscape feature in the site. A managed wetland rain garden is proposed extending from the eastern site boundary and along the ditch line at the back of Little Auburn to meet and cross the new avenue. This forms an interesting landscape threshold between two character areas, with wetland planting providing contrast as well as adding to the ecology and biodiversity of the site.

Please refer to documentation prepared by Waterman Moylan Consulting Engineers, JBA Consulting, and TBS Landscape Architects.

2.7 Item No. 7 – Daylighting Assessment

ABP Opinion

“Further consideration and elaboration of the documents as they relate to daylighting to proposed apartment units, which should have regard to the provisions of “Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice”, (BR209) by Paul Littlefair”.

Applicant’s Response

In response to this request, Waterman Moylan Consulting Engineers prepared an updated Daylighting Report, which is submitted under separate cover as part of the planning application. In relation to daylighting to apartment blocks, particularly Blocks 1 to 3. These blocks are well spaced and arranged on a north south axis. The apartments face predominantly east or west. The building form is modelled with semi-recessed balconies which give the optimum balance between shelter, privacy and daylighting. The balconies are predominantly placed on front bedrooms and entered by a side door from the living room. This is ideal as the optimum lux level in the living area is higher than the bedroom, and the living room door generally faces south.

The courtyard spaces at Blocks 1 to 3 are generous and are open to the south ensuring excellent sun penetration all year. The courtyard at Blocks 4 and 5 raised over a parking podium which has a predominantly two storey edge at that level, rising to a three-storey shoulder with recessed penthouses over in part. It is exposed to south/southeast sunshine on its long axis ensuring it is well lit all year. Blocks 6, 7 and 8 are pavilion blocks with communal spaces to the south.

The Daylighting report by Waterman Moylan also confirms that the development receives high levels of light to amenity spaces and that it will not give rise to an adverse effect on third party properties. For further details, please refer to the Daylighting Report carried out by Waterman-Moylan Consulting Engineers which confirms that the scheme complies with the provisions of BRE209.

2.8 Item No. 8 – Traffic, Transportation & Parking

ABP Opinion

“Further consideration and elaboration of the documents as they relate to the design and layout of internal roads, car and bicycle parking, and to the assessment of traffic and transportation impacts arising from the proposed development. Particular regard should be had to the issues raised in the report of the planning authority Transportation Planning Section in this regard”.

Applicant's Response

Road Hierarchy and Layout

Road hierarchy at an Urban Design level is explained in the architect's report, prepared by CCK Architects & Urban Designers. Precedence is given to pedestrian and cycle movement. The original avenue forms a dedicated green route into the heart of the site from Dublin Road. This is the desire line for residents to public transport and to Malahide Demesne directly opposite. The location is ideal for bike and ride also, a short cycle through the Demense leads directly to the Dart station, and the town facilitates services, shopping, or socialising on the way home. The wooded environs of the site with various natural paths, open spaces and greenway, coupled with the Demesne close by, will encourage sustainable modes as the experience will be attractive.

Local access to houses in the sensitive parts of the site around the front paddock are on shared surface private shared driveways serving small numbers of houses at a time. The shared surface consists of a concrete grasscrete paviour, with a flush solid concrete section down one side. The intent is to make the vehicle path to the house slow and inconspicuous, and that it blends into the landscape without becoming a barrier.

Pedestrians and cyclists are prioritised in the design of the proposed development and the landscape and setting are intended to dominate the car and not the other way around.

Traffic Impact & Assessment

Cycle parking is provided at the rate of one space per bedroom for apartments with cycle parking securely located either within the building footprint, which is in accordance with the National Apartment Guidelines and exceed the Development Plan standards. Visitor spaces are deployed near the various apartment core entrances. The cycle parking is included in the various HQAs. Cycle parking for houses can be arranged on curtilage. Garden access is generally available.

Many of the courtyard houses have bin/cycle stores accessible from the front. Car parking is provided at a rate of 2 spaces per housing unit and an average of 1 space per unit for apartments. Visitor spaces are provided in the Block 4 at the front, and between Blocks 1 and 2 in the back field. Local provision is made for the Streamstown Blocks 6 – 8.

Waterman Moylan Consulting Engineers also prepared a Travel Plan to support a reduction in traffic and facilitate a modal shift towards more sustainable forms of transport. They also prepared a Traffic & Transport Assessment, which concluded by stating:

“The results of public transport assessment indicate that the capacities of both rail and bus services will be greater than demand forecast.

Based on the junction and public transport assessment, it can be confirmed that there is sufficient capacity in the road and public transport networks to facilitate the proposed development”.

The Board are invited to refer to the transportation report, Travel Plan and documentation prepared by Waterman-Moylan Consulting engineers for the technical documentation and traffic assessments. It is also noted that Fingal County Council’s Transportation Department commentary regarding basement and undercroft parking have been addressed in the layouts of the buildings.

2.9 Item No. 9 – Public and Communal Open Spaces

ABP Opinion

“Further consideration and elaboration of the documents as they relate to the design and layout of open space across the site, clearly identifying and defining public private and communal spaces”.

Applicant’s Response

In further elaborating upon the design and layout of the open spaces across the site, TBS Landscape Architects have prepared a detailed landscaping plan and design report, along with sections and planting/material schedules, while CCK Architects & Urban Designers have set out on DWG No. 1902 P032 the breakdown of public and communal open space areas across the site. The Board are invited to refer to these for further details.

The proposed development exceeds the minimum quantum of open space areas including: 6,473 sq.m. of communal open space and 2.56 hectares of usable public open space (excluding attenuation areas and woodlands).

The collaboration between The Tree File and TBS Landscape Architects has informed in detail how the site is best developed with a view to managing and improving the woodland over time. A long-term woodland management plan is part of the proposals. A lot of the senior planting is coming to its end of life, and the plan will ensure continuity and renewal in a sustainable way. This will gradually restore the balance and control the advance of opportunist invasive species. This will add to the overall landscape character of the area and development.

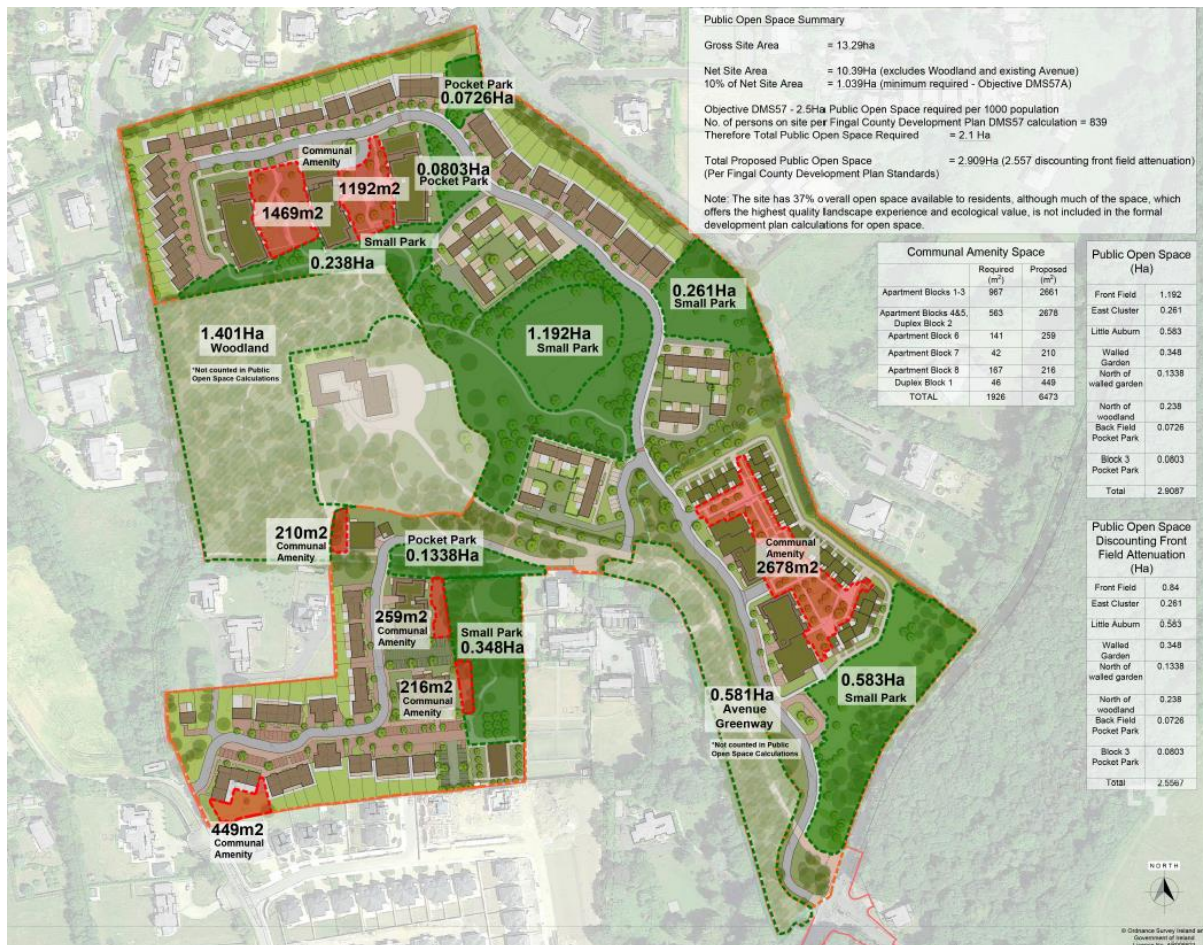


Fig. 12 – View of Auburn House from front lawn, looking west (Source: CCK Architects & Urban Designers Site Layout, Public Open Space drawing)

While the hierarchy of open space as defined by the development plan results from this understanding, it should be noted that this site has so much to offer that is not technically included in development plan calculations. The greenway avenue and the woodland paths in particular will be an outstanding asset.

In a post Covid world there is a greater recognition of the importance of contact with the natural world to maintain health and wellbeing. Loop walks in naturalised settings may offer more to more people than ‘traditional’ open space as expressed in development plans.

The site also has the very considerable advantage of being right beside Malahide Demense one of the best public parks in Dublin, and that that park is a link to a coastal town with marine facilities and amenity networks. This site, should neighbouring estates so choose, will be an extension of that high quality green linkage.

3.0 Notification of Authorities

The Board also requested that, pursuant to Article 285(5) (a) of the Planning and Development (Strategic Housing Development) Regulations 2017, 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:

- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Heritage Council
- An Taisce
- An Comhairle Ealaíon
- Fáilte Ireland
- Irish Aviation Authority
- Irish Water
- Dublin Airport Authority

Downey Planning can confirm that the above list of bodies have all been notified of the making of this planning application and copies of the relevant correspondence to them are included under separate cover as part of this application to the Board.

5.0 Conclusion

This Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion indicates how the items outlined within An Bord Pleanála's Opinion have been fully addressed by the applicant and design team prior to lodgement of this application to An Bord Pleanála.

The document also addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the accompanying planning submission documentation.

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.

The changes pertaining to the design of the proposed development incorporated into the final scheme proposed are considered to result in a high-quality development now being presented to An Bord Pleanála for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for strategic housing development at Auburn.

In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.