

Planning & Property Development Department,
Dublin City Council,
Block 4,
Floor 3,
Civic Offices,
Wood Quay,
Dublin 8.

8th October 2021

FURTHER INFORMATION RESPONSE

RE: Permission for development at this site located at 47 47b 49 51 & 53 Keeper Road, Drminagh, Dublin 12 (and extending to the laneway at the rear of said properties).

The development will consist of the following: Demolition of existing commercial units and ancillary buildings (1-2 storey) (c.1,675 sq.m in total) and the construction of a 5 to 6 storey, mixed use development including 53 no. apartments (26 no. 1-beds and 27 no. 2- beds). All units provided with private balconies facing north/south/east/west.

Applicant: Teabrook Ltd.
Development Address: 47,47b, 49, 51, 53 Keeper Road, Drminagh, Dublin 12

DCC Reg. Ref: 2463/21
Date of Request for Further Information: 19th May 2021
Final Date to Respond to Request: 18th November 2021.

Introduction

McGill Planning Limited, 45 Herbert Lane, Dublin 2, is instructed by our client, Teabrook Limited, to submit this further information response to the letter sent by Dublin City Council.

For convenience, we have listed items requested as they appear in the further information request letter dated 24th May 2021.

Further Information Item No. 1:

1. Planning Matters

The Planning Authority has concerns regarding the quantum of development on the site. The proposal as presented represents a significant overdevelopment of the site, this is

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evident by way of its scale and also, the low parking provision and a clear lack of any public open space.

a) The Planning Authority has concerns regarding the visual impact that the proposed development will have on the surrounding area, to the streetscape, and in particular the neighboring property at 45 Keeper Road. The applicant is requested to consider the following revisions in an effort to reduce the visual impact of the proposal.

(i) Reduce the overall height of Blocks A and B by at least one storey. Revised and updated CGI's should also be submitted reflecting the reduction in height and scale.

(ii) The applicant is requested to submit revised and updated Daylight and Sunlight Assessment reflecting the revisions in height and scale. The Planning Authority also has concerns regarding the quality of some of the proposed units. The applicant is requested to submit a full assessment of each unit proposed in relation to Average Daylight Factor, the assessment surveys only 14 of the units proposed.

(iii) The revisions should include improvements to the proposed areas of communal amenity space.

Applicant's Response

(a)(i) The development has been reduced by one full storey overall and now comprises a 4-5 storey apartment development comprising a total of 41 no. apartments including 20 no. 1-bed and 21 no. 2-bed units. The revised scheme is detailed in the submitted FI Response drawings and visualisations prepared by NDBA Architects and 3DDB.

(a)(ii) A full Daylight and Sunlight Assessment prepared by 3DDB is submitted with this response. It includes for the following:

- Impact assessment on the surrounding environment and properties, which includes VSC and sunlighting analysis. The effects were assessed in the baseline state versus the proposed state,
- Scheme Performance: Daylight and sunlight assessment of the proposed development, which includes sun lighting to the proposed amenity spaces and internal daylighting (ADF) to all habitable rooms.

In relation to Average Daylight Factor (ADF), a total of 103 no. rooms within the 41 units were assessed.

The following is noted:

1. All of the Living/Kitchen/Dining (LKD) areas have ADF values greater than 2%.
2. Overall the ADF Compliance is 79%. This is due to a number of bedrooms falling below the 1% standard. It is noted that these bedrooms face towards the internal courtyard and due to the presence of the opposite block (even with the reduced height now

proposed) there is greater propensity for the bedrooms to fall before the 1% ADF standard.

3. In Section 3.2 of the Section 28 Building Heights Guidelines, it is noted that:

“Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

With regard to the above, we note that following compensatory design measures proposed in this instance to mitigate the lower ADF standard for a number of bedrooms:

- (a) As noted above, all units have LKDs with ADF above 2%. In fact the average ADF value for the LKDs is 4.03% which is more than double the 2% (See Appendix A below). The proposed design will therefore provide living areas for future residents that have exceptionally high natural daylighting.
- (a) All unit sizes exceed the minimum standards applied under the Section 28 Apartment Guidelines (2020).
- (b) All units are provided with private open space well above minimum standards.
- (c) A total of 324 sq.m of communal open space (excluding the ground floor courtyard) is provided as part of the development which is 30% greater than the minimum requirement for the 41 units (247 sq.m as per the Apartment Guidelines Appendix 1) and all will be well daylit (as per the 3DDB report submitted).
- (d) All units will benefit from the unique design with walkways provided to the front door of each unit on each floor and overlooking a safe and secure, internal courtyard which will provide for an additional semi-private space and a quieter environment at night for the bedrooms when residents are sleeping.
- (e) Residents will benefit from direct access to a creche and retail unit at ground floor, and a dedicated and secure bicycle parking area.

Given the above it is considered that the failure rate on some of the bedrooms facing the internal courtyard is sufficiently compensated for within the proposed design and that accordance with the standards is achieved overall.

(a)(iii) As noted above, a total of 324 sq.m of communal open space (excluding the ground floor courtyard) is provided as part of the development which is 30% greater than the minimum requirement for the 41 units (247 sq.m as per the Apartment Guidelines Appendix 1) and will be well lit (as per the 3DDB report submitted). Additional improvements to the landscaping are detailed in the drawings prepared by PC Roche.

(b) The applicant is advised that the Planning Authority have serious concerns regarding the proximity of the northern elevation to the site boundary of the adjoining site to the north which has recently been rezoned from Z6 to Z10. There are serious concerns regarding the degree of overlooking from windows and roof gardens on this elevation onto this future development site. The applicant should demonstrate that the proposal will respect and not have a detrimental impact on the future development of this site including appropriate separation distances and measures to negate any overlooking. The revised and updated Daylight and Sunlight Assessment as required above should also make reference to any overshadowing that may occur to this adjoining site.

Applicant's Response

We refer to the revised Site Plan and drawings prepared by NDBA Architects, which indicate the northern blocks now positioned further south from the boundary with the industrial estate to the north.

As revised the elevation of the northern block, at 1st and upper floors, is set back c.18.5m from the wall of the existing industrial building (in Glenview Industrial Estate) to the north. The development at ground floor (comprising the undercroft car park) runs to the boundary with the estate and will have a c.4.5 m high boundary wall maintained and which will screen the communal open space at 1st floor.

Glenview Industrial Estate comprises 3.9ha (c.10 acres) and under Variation no. 22 of the City Development Plan was rezoned from Z6 to Z10 "To consolidate and facilitate the development of inner city and inner suburban sites for mixed-uses, with residential the predominant use in suburban locations, and office/retail/residential the predominant uses in inner city areas."



Section 16.6 of the City Development Plan sets an indicative Site Coverage standard of 50% for Z10 developments, which is much lower than more intensive development zonings such as Z4 (80%) and Z5 (90%).

It is anticipated that redevelopment of this extensive Z10 area will provide for mixed uses at a higher density and scale than envisaged in the previous Z6 zoning but which at the same time will need to be mindful of existing developments and residential areas in the vicinity. Hence the 50% site coverage which allows for a suitable buffer between new buildings within Z10 zone and existing residential developments.

Given the above it is considered that the building line of the existing industrial building next to the application site and adjoining houses is a reasonable indicator of the likely future development footprint of future development in this part of the Z10 zoning.

A set-back distance of c.18.5m as now achieved with the revised proposal is considered suitable, appropriate, comparable to other brownfield/infill developments permitted in Inner Suburban locations, and in accordance with the "Performance Based Design Standards" promoted by the National Planning Framework to enable brownfield development.

(c) The applicant is requested to provide details on their requirement to provide for public open space for 10% of site area and to confirm whether it is their intention to make a contribution in lieu of the provision of public open space.

Applicant's Response

Section 16.3.4 of the Development Plan requires most developments to set aside 10% of the site area as public open space. Financial contribution in lieu of public open space can be considered by the planning authority when the development is too small or inappropriate to fulfil useful purpose in this regard. The Development Plan states:

Where there is evidence that sufficient public open space already exists in the locality, consideration will be given to the provision of indoor recreational facilities with public access for residents and workers in the vicinity, and any provision of such facilities must have regard to the objectives of the 'Dublin City Sport and Active Recreation Strategy 2009–2016' or any subsequent updated strategy.

In this instance we note the significant Brickfield Public Park c.200m from the application site which will serve future residents. The additional public benefits provided within the development in the form of a new creche and retail unit are also noted.

The site, given the location and form of development proposed is not considered appropriate for provision of Public Open Space on site. Should the planning authority considered it necessary it can impose a condition requiring a financial contribution in lieu of public open space provision, as is allowed for under the Development Plan.

(d) The Planning Authority requests that the applicant provides some variance in external materials on the southern (street facing elevation).

Applicant's Response

Improved elevational treatment is now provided for as demonstrated in the NDBA drawings and 3DDB visualisations submitted.

Further Information Item No. 2:

The Planning Authority notes that public realm works are proposed outside of the redline area, including the removal of a number of informal parking spaces to the front of the existing building. The applicant is requested to clarify whether this area is within their ownership or if they have appropriate letters of consent from the landowner.

Applicant's Response

DCC are in control of the public realm to the south of the site and also do not issue Letters of Consent in relation to works to the public realm that are not considered significant (i.e. new junctions, road widening etc. would require a letter of consent). The works outlined in the public realm provide for a more sustainable car/bicycle parking layout/provision. Additional landscaping/planting is also proposed.

Separately a letter of consent was given by DCC in relation to the rear laneway given its proposed removal as part of this application.

Further Information Item No. 3:

- (a) The applicant is requested to submit an appropriate Site Specific Flood Risk Assessment (SSFRA) for the proposed development. The SSFRA should be prepared in accordance with the requirements of the OPW Guidelines and the Dublin City Development Plan 2016-2022 Strategic Flood Risk Assessment.***
- (b) The applicant is requested to submit a revised drainage layout with the exception of the outfall pipe, all private drainage infrastructures such as gullies, manholes, armstrong junctions, flow control devices etc. are to be located within the final site boundary.***

Applicant's Response

Please refer to the updated drainage layout prepared by KBA Engineers and the SSFRA prepared by JBA Consulting Engineers.

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Further Information Item No. 4:

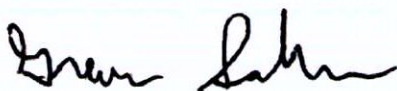
- (a) The applicant is requested to clarify, by way of submitting the appropriate documentation for the current 'right of way' status of the laneway located to the northern boundary, to demonstrate exactly the area that is included within the development site.***
- (b) The applicant is requested to submitted detailed plans of the proposed vehicular entrance off the laneway to the north of the site.***
- (c) The applicant is requested to clarify by way of revised plans indicating the provision of EV charging points for a minimum 10% of spaces and also detail the number of motorbikes spaces as per Development Plan Standards. The applicant is also requested to include within the updated plan drawing, a minimum of 1 no. car share space within the proposed development to supplement the car parking numbers proposed for staff and resident use.***
- (d) The applicant is requested to submit further details of the type of cycle parking stands proposed within the resident cycle store. The applicant should confirm by way of illustration, including dimensions, that sufficient space is available within the designated cycle parking areas to accommodate the cycle parking and the required operating space including maneuverability around stands and that the proposed system allows both wheels and frame to be locked. The availability of cargo bike spaces to visitors, in particular the crèche and delivery operators should also be clarified.***
- (e) The applicant is requested to clarify the proposed service arrangements in relation to the proposal to avoid servicing via Keepers Road. A swept path analysis drawings indicating how a refuse vehicle will enter and exit the western laneway to service the proposed development should also be provided. The applicant should also clarify the location of a temporary waste storage area within the private landing of the proposed development in order to ensure refuse bins are not stored on the footpath prior to collection.***

Applicant's Response

See attached report and drawings prepared by Transport Insights Transport Engineers.

In relation to sub-item (a) we also refer to Appendix B attached which includes the Letter of Consent (and Map) from DCC in relation to the back lane, and which confirms ownership of the full length of the laneway as far as the connecting road from Keeper Road.

Yours sincerely,



Trevor Sadler
McGill Planning Limited

LIST OF ENCLOSURES

6 no. copies of the following :

- Updated architectural drawings and area schedule prepared by NDBA Architects (see separate schedule).
- Photomontages Report and Sunlight/Daylight Report prepared by 3DDB.
- Updated landscape drawings prepared by PC Roche Landscape Architects.
- FI Response Report and 2 no. Drawings (Swept Path Analysis) prepared by Transport Insights.
- Site Specific Floodrisk Assessment prepared by JBA Consulting Engineers.
- Revised Drainage Layout prepared by KBA Consulting Engineers.

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APPENDIX A – ADF VALUES FOR LKDS IN EACH UNIT

Unit No.	Achieved ADF % Value in LKD	% Greater than 2% ADF
1	6.76	338
2	6.34	317
3	4.49	225
4	3.93	197
5	3.93	197
6	3.95	198
7	2.35	118
8	4.23	212
9	4.42	221
10	4.23	212
11	2.26	113
12	2.15	108
13	2.12	106
14	2.26	113
15	5.19	260
16	4.64	232
17	4.65	233
18	4.69	235
19	2.57	129
20	4.97	249
21	4.92	246
22	4.67	234
23	2.76	138
24	3.19	160
25	2.05	103
26	2.69	135
27	4.81	241
28	4.30	215
29	3.48	174
30	3.71	186
31	6.57	329
32	4.99	250
33	4.58	229
34	3.95	198
35	3.30	165
36	3.53	177
37	3.98	199
38	4.03	202

39	4.30	215
40	5.02	251
41	4.20	210
Avg.	4.03%	201%

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