

July 2023

Response to Request for Further Information
LRD Application DLRCC Reg. Ref. LRD22A/0930
Proposed residential development at Dalguise House,
Monkstown Road, County Dublin

Prepared for:

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Monday, 24 July 2023

[By Hand]

Response to Request for Further Information

DLR Reg. Ref. LRD22A/0930

Requested Date: 26 January 2023

Dear Sir/Madam

RE: LRD APPLICATION IN RESPECT OF A PROPOSED RESIDENTIAL DEVELOPMENT ON A SITE OF C. 3.58 HA LOCATED AT DALGUISE HOUSE, MONKSTOWN ROAD, MONKSTOWN, DUBLIN

1.0 INTRODUCTION

1.1 Response to a Request for Further Information

The Applicant, GEDV Monkstown Owner Limited¹, has retained Tom Phillips + Associates² in association with Reddy Architecture and Urbanism and a multi-disciplinary Design Team to submit this Response to a *Request for Further Information* in respect of a Large-Scale Residential Development Application in relation to the proposed BTR development at a site of c. 3.58 hectares at Dalguise House (Protected Structure RPS No. 870), Monkstown Road, Monkstown, County Dublin, A94 D7D1 (the lands include the following structures identified as Garage (A94 N3A1); Gate Lodge (aka Brick Lodge) (A94 R9T1); Dalguise Lodge (aka Entrance Lodge) (No. 71 Monkstown Rd, A94 TP46); White Lodge (A94 V6V9)); and on-street car parking in front of Nos. 6 and 7 Purbeck (A94 C586 and A94 HT99, respectively), with the provision of vehicular and pedestrian access and egress at two points on Monkstown Road: the existing entrance to Dalguise; and at Purbeck.

This RFI Response Report co-ordinates the Applicant's Response to Dún Laoghaire-Rathdown County Council's *Request for Further Information*. A copy of Dún Laoghaire-Rathdown County Council's *Response for Further Information* in respect of Reg. Ref. LRD22A/0930, dated 26 January 2023 is attached at Appendix A.

The deadline for the Response to the *Request for Further Information* was extended by the Planning Authority on request by the Applicant. The revised Response deadline is 25th July 2023, as confirmed by Dún Laoghaire-Rathdown County Council Letter dated 24th March 2023, attached at Appendix B.

¹ 3rd Floor, Kilmore House, Spencer Dock, Dublin 1.

² 80 Harcourt Street, Dublin 2, D02 F449.

The Applicant's response is set out below under the twenty-nine specific request Items. (See Sections 2-30.)

1.2 Overview of Modifications to the Scheme

1.2.1 Description of Development as Originally proposed – Application Scheme

The description of the development as per the Application Scheme (November 2022) is outlined below:

GEDV Monkstown Owner Limited intends to apply for permission for development on a site of c. 3.58 hectares at Dalguise House (Protected Structure RPS No. 870), Monkstown Road, Monkstown, County Dublin, A94 D7D1 (the lands include the following structures identified as Garage (A94 N3A1); Gate Lodge (aka Brick Lodge) (A94 R9T1); Dalguise Lodge (aka Entrance Lodge) (No. 71 Monkstown Rd, A94 TP46); White Lodge (A94 V6V9)); and on-street car parking in front of Nos. 6 and 7 Purbeck (A94 C586 and A94 HT99, respectively), with the provision of vehicular and pedestrian access and egress at two points on Monkstown Road: the existing entrance to Dalguise; and at Purbeck.

Alterations will be made at Purbeck including the relocation of 4 No. existing car parking spaces to facilitate the construction of a new vehicular and pedestrian bridge over the Stradbroom Stream.

The development, with a total gross floor area of approximately 46,940 sq m (including a basement of 5,230 sq m and undercroft parking of 1,344 sq m) (of which some 45,712 sq m is new build, and 1,228 sq m retained existing buildings), will consist of the construction of 491 No. residential units, consisting of 484 No. new build and 7 No. residential units (the latter within existing structures (repurposed from Dalguise House, Gate Lodge (Brick Lodge) and Coach House)).

The residential provision will comprise: 3 No. two storey 3-bed terraced houses (GFA 569 sq m), and 488 No. Build-to-Rent units (consisting of 2 No. studio units; 288 No. 1-beds; 32 No. 2-beds/3 persons; 153 No. 2-beds/4-persons; and 13 No. 3-beds) (with an option for the use of 4 No. of the BTR Units to cater for short-term stays of up to 14 days at any one time to cater inter alia for visitors and short-term visits to residents of the overall scheme) residential amenities and residential support facilities; a childcare facility; and restaurant/café.

The development will consist of:

the demolition and partial demolition of existing structures (total demolition area 967 sq m, comprising: two residential properties (White Lodge (A94 V6V9), a 2 storey house (192 sq m); and a residential garage (A94 N3A1) and shed to the southwest of Dalguise House (285 sq m)); swimming pool extension to the southeast of Dalguise House (250 sq m); lean-to structures to the south of the walled garden (142 sq m); part-demolition of Lower Ground Floor at Dalguise House (9 sq m); single storey extension to the south of the Coach House (29 sq m) and three ancillary single-storey structures (8 sq m, 8 sq m, and 31 sq m) within the yard; potting shed (13 sq m); removal of 2 No. glasshouses; and alterations to, including the creation of 3 No. opes and the removal of a 12.4 m section of the walled garden wall to the east);

the construction of: 11 No. residential blocks (identified as: Block A (total GFA 2,015 sq m) 7 storey, comprising 19 No. apartment units (15 No. 1-beds, 4 No. 2-beds) and a childcare facility (540 sq m over Ground and First Floor Levels); Block B (total GFA 3,695 sq m) 7 storey over undercroft car parking, comprising 48 No. apartment units (33 No. 1-beds, 6 No. 2-beds/3 persons, 9 No. 2-beds/4-persons);

Block C (total GFA 3,695 sq m) 7 storey over undercroft car parking, comprising 48 No. apartment units (33 No. 1-beds, 6 No. 2-beds/3 persons, 9 No. 2-beds/4-persons); Block D (total GFA 4,150 sq m) 7 storey over basement level car park, comprising 50 No. apartment units (24 No. 1-beds, 26 No. 2-beds); Block E (total GFA 5,904 sq m) 9 storey over basement level car park, comprising 66 No. apartment units (40 No. 1-beds, 26 No. 2-beds), with residents' support facilities (75 sq m) and residents' amenities (gym, yoga studio, residents' lounge/co-working space; lobby 494 sq m) at Ground Floor Level, and residents' amenities (residents' lounge; games room; screen room; private lounge; kitchen 333 sq m) with roof terrace (106 sq m) at Eighth Floor Level; Block F (total GFA 5,469 sq m) 7 storey over basement level car park, comprising 76 No. apartment units (46 No. 1-beds, 5 No. 2-beds/3 persons, 23 No. 2-beds/4-persons, 2 No. 3-beds); Block G (total GFA 5,469 sq m) 7 storey over basement level car park, comprising 76 No. apartment units (46 No. 1-beds, 5 No. 2-beds/3 persons, 23 No. 2-beds/4-persons, 2 No. 3-beds); Block H (total GFA 4,252 sq m) 5 storey over Lower Ground Floor, comprising 54 No. apartment units (30 No. 1-beds, 5 No. 2-beds/3 persons, 17 No. 2-beds/4-persons, 2 No. 3-beds); Block I1 (total GFA 1,038 sq m) 3 storey, comprising 12 No. apartment units (3 No. 1-beds, 2 No. 2-beds/3 persons, 7 No. 2-beds/4-persons); Block I2 (total GFA 1,038 sq m) 3 storey, comprising 12 No. apartment units (3 No. 1-beds, 2 No. 2-beds/3 persons, 7 No. 2-beds/4-persons); and Block J (total GFA 1,844 sq m) 4 storey, comprising 20 No. apartment units (13 No. 1-beds and 7 No. 3-beds));

the refurbishment, adaptation and reuse of: two storey Dalguise Lodge (Entrance Lodge) (GFA 55 sq m) comprising residential support facilities; a single storey Gate Lodge (GFA 55 sq m) comprising 1 No. 1-bed unit; and two storey Coach House and single storey Stableman's House (GFA 319 sq m) to provide 3 No. apartment units (1 No. 1-bed, 2 No. 2-bed/4 persons); the refurbishment, adaptation and change of use of Dalguise House (GFA 799 sq m) from a single residential dwelling to provide: 3 No. apartment units (2 No. studios and 1 No. 2-bed/3 person) at First Floor Level; a restaurant/cafe at Lower Ground Floor Level (GFA 273 sq m); and residents' amenities at Ground Floor Level (library, residents' lounge, events space, bar/bookable room, 157 sq m);

works to the existing structures include: removal of existing internal partitions and doors, alterations to internal layout including provision of new partitions and doors to Dalguise Lodge (Entrance Lodge); the removal of the western chimney and chimney breast, removal of existing internal partitions and doors, and alterations to internal layout including provision of new partitions and doors to Gate Lodge (Brick Lodge); replacement of existing roof, windows and doors, non-original mezzanine floor and stairs of Coach House, creation of new internal and external opes, reconstruction of chimney, construction of new stairs, provision of new internal partitions and doors, replacement of the demolished single storey structure to south of Coach House with a 42 sq m single storey extension, including construction of a link between Coach House and Stableman's House; replacement of existing roofs, windows, doors, creation of new external opes and provision of new internal partitions and doors to Stableman's House; restoration of Coach House yard walls; removal of security bars from windows, internal partitions, doors, two secondary staircases, non-original fireplaces; and the reconfiguration of internal layout including introduction of new partitions, doors and fireplaces, in-fill of former secondary staircases; removal of an existing window at rear facade of Lower Ground Level, alterations to ope and replacement with a new external door; reinstatement of external wall fabric in place of demolished lean-to at the rear facade; and removal of external door to swimming pool on eastern facade and closure of ope at Dalguise House).

The development will also consist of: the construction of a garden pavilion; the provision of balconies and terraces, communal open space including roof gardens, public open spaces, hard and soft landscaping, landscaping works including the removal of trees, alterations to boundaries; the provision of: 224 No. car parking spaces (148 No. at basement level; 20 No. at undercroft; and 56 No. at surface level); motorbike spaces; level changes; ESB Substations (at Block D and Block H); plant areas; waste storage areas; provision of cycle parking (including cargo bike spaces) at basement and surface level; and all ancillary site development works above and below ground.

Provision is made in the landscaping proposals for potential future pedestrian and cycle connections that would facilitate permeability through the site boundaries with the residential estates of Arundel and Richmond Park, respectively, and the former Cheshire Home site, subject to agreement with those parties and/or Dún Laoghaire-Rathdown County Council, as appropriate.

1.2.2 Key Alterations Made at Response to Further Information Stage

Statistical Comparison of the Two Schemes			
Site Statistic	Application Scheme (November 2023)	RFI Response Stage	Difference
Site Area	c. 3.58 ha (c. 8.8 acres)		unchanged
Total Floor areas	46,940 sq m (including a basement of 5,230 sq m and undercroft parking of 1,344 sq m) (of which some 45,712 sq m is new build, and 1,228 sq m retained existing buildings)	47,382 sq m (including a basement of 5,396 sq m and undercroft parking of 1,403 sq m) (of which some 46,154 sq m is new build, and 1,228 sq m retained existing buildings),	+442 sq m
No. of Residential Units	491	493	+2
No of New Build Units	484	486	+2
No. or Units within Structures Retained/Repurposed	7	7	Unchanged
Car Parking No.	224	228	+4
Cycle Parking No.	1,071	971	-100
Motorbike Parking No.	8	8	unchanged

Table 1.1: Comparison of the Application and RFI Scheme respectively.

	Apartments	Houses	Total	Difference (compared to scheme lodged)
Studio	2		2 (0.4%)	No change
1 bed	289		289 (58.6%)	+1
2 bed (3 person)	20		20 (4.1 %)	-12
2 bed (4 person)	166		166 (33.7 %)	+13
3 bed	13	3	13 (2.6%) 3 (0.6%)	No change
	490	3	493	+2 units

Table 1.2: Unit Mix Comparison of the Application and RFI Scheme.

Unit Numbers and Mix

As noted above, the unit numbers and mix has been altered.

- **Block D:** Two additional apartment units were added to the south of Block D at the lowest floor, as a result of redesigning the entrance to the basement car park towards Block E to the east, which resulted in an unoccupied space in Block D. 2 No. additional apartments were added to the space (1 No. 1-bed and 1 No. 2-bed unit).
- **Block J:** An additional entrance has been added to the southern façade of the building. As a result a 3-bed unit has been converted to a 2-bed unit at Ground Floor Level.
- **2 bed-units:** A number of 2 bed/3 person units have been re-allocated as 2 bed/4 person units.

External Materials

The external materials for a number of the Apartment Blocks have been updated to warmer tones, which is considered to be more appropriate for the site location and will soften the appearance of the new builds. The materials differ between certain Blocks also to ensure that nearby buildings do not read as one mass.

Residents' Amenities

An additional residential amenity space has been added to the first floor of Block E (42 sq m), bringing the total residents amenity space to 1,034 sq m.

Signage/Wayfinding

Additional drawings have been provided to indicate how wayfinding signage would be provided across the site to assist residents and visitors to circulate through the site.

Cycle Parking and Access

Whilst the total number of cycle parking space has been reduced, the quality of the provision has increased. Cyclists entering the cycle parking provided under Blocks D, E, F and G in the centre of the site are no longer required to use the same access route from Purbeck as cars. Cyclists will instead enter the site from the existing Monkstown Road site, and access the cycle parking using a separate door on the northern façade of Block D. In respect of the other Blocks a combination of internal and external cycle parking is provided. Short stay cycle parking spaces are entirely Sheffield stands and are located in proximity to building entrances. Detailed information relating to cycle parking is provided in the Cameo and Partners documentation and drawings.

Accessibility

Accessibility is improved through the redesign of the external stairs and lift between Blocks A and B, which connects the Purbeck site entrance to the main avenue at the upper level. This change provides a more generous welcoming route for pedestrians and the accessible option of the lift is clearer. Furthermore, all paths through the site that connect Buildings, public and communal open spaces and cycle parking are designed to be 2m wide, resin bound paths that will provide access to all. There are limited areas where due to the need to retain existing trees it is not possible to change levels and the paths provided do not meet full accessibility standards, however, these are on the periphery of the site (excluded from calculations of public and communal open spaces). Accessible parking and set down areas have been added to the scheme.

Historic Buildings

As required by the Request for Further Information, both chimneys of the Brick Lodge will be retained. The exterior of Dalguise House will not be painted, the existing external finish (unpainted render) will be retained and repaired where necessary. Plant and plant screening associated with the café/restaurant at Dalguise House has been identified. A screened area will be added to the western side of the House.

Archaeology

Archaeological Test Trenching was carried out across the site by IACL, in response to the Request for Further Information (see Appendix 14.1 of the EIAR). No archaeological material was uncovered on site, however, archaeological mitigation measures are still proposed.

Historic Landscape Assessment

An additional report, *Historic Landscape Assessment of its Lands and Environs*, prepared by John Olley has been provided at Appendix 15.1 of the EIAR, which details the history of the landscape of the site and its evolution over time.

Alignment of CEMP and EIAR

The Construction and Environmental Management Plan (CEMP), prepared by Byrne Looby Consulting Engineers and the Environmental Impact Assessment Report (EIAR) have been revised to take account of the Further Information Request and changes made to the proposed development. The CEMP has regard to the relevant sections of the EIAR and other Application documentation, including *inter alia* Noise, Biodiversity, Land, Hydrology.

Should Planning Permission be forthcoming, it is anticipated that a Condition would be attached requiring the written agreement of a CEMP prior to commencement of development.

Life of Permission

The Applicant is GEDV Monkstown Owner Limited is associated with the eventual operator Greystar, who are an established global BTR operator. Should the Planning Authority be minded to grant planning permission, the intention is to implement the permission immediately and to operate the scheme. However, having regard to the scale of development, likely prior to commencement conditions, the predicted construction timeframe and the seasonal constraints associated with development at the site, it is requested that if the Planning Authority is minded to grant planning permission that it would consider conditioning the life of the permission for 7 years.

1.3 Multi-disciplinary Project Team

In addition to Tom Phillips + Associates, Town Planning Consultants, the Applicant has assembled an interdisciplinary team of experienced consultants to design and evaluate the scheme, including Reddy Architecture and Urbanism who designed the proposed development, in association with:

- Landscape Architects (Cameo and Partners)
- Conservation Architects (Mullarkey Pedersen Architects)
- Consulting Engineers (Byrne Looby Consulting Engineers)
- Transport Engineers (ROD Consulting Engineers)
- Ecology/Biodiversity (ROD Consulting Engineers)
- Waste (AWN Consulting)
- M&E and Daylight (Metec Consulting Engineers)
- Archaeology (IACL)
- Visual Impact Assessment (Macroworks)
- Landscape Heritage (Dr John Olley)
- Photomontages (Redline Studios)
- Visualisations (Modelworks)

1.4 Schedule of Documents and Drawings

A full schedule of all contents of this *Response to Request for Further Information* is enclosed as a separate document.

1.5 Website

The Website associated with the proposed development has been updated to include the Further Information reports and drawings, in addition to the original documentation.

1.6 Format of this Response

This Report is formatted as follows:

Section 1 sets out the **introduction and context** of the RFI Response;

Sections 2-30 set out the **Applicant's response** to each Item in the *Request for Further Information*;

Section 31 provides the **conclusion** to this Report.

In addition, the following documents are appended:

Appendix A: *Request for Further Information*, dated 26 January 2023 (Reg. Ref. LRD22A/0930).

Appendix B: Letter from Dun Laoghaire Rathdown County Council, dated 23rd March 2023, facilitating an extension of Response date to 25th July 2023.

2.0 FURTHER INFORMATION ITEM NO. 1 – BTR ACCOMMODATION

“The applicant has not adequately demonstrated that the proposal does not result in a proliferation of BTR accommodation with an appropriate mix within the wider area and within the site, in accordance with Policy PHP28 of the current County Development Plan. In this regard the applicant is requested to provide details of all existing and permitted BTR apartments within 1km catchment of the site. The details provided should include the location, the number of apartments and unit mix.”

2.1 Applicant’s Response to FI Item No. 1

In response to Item No. 1, Tom Phillips + Associates prepared the response to this Item.

2.1.1 Definition of Build-to-Rent

The Apartment Guidelines 2020 note that ‘Build-to-Rent’ (or BTR) can be defined as:

“Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.” [Our emphasis.]

The Development Plan, Section 12.3.6, defines BTR as:

“purpose-built, long-term rental apartment accommodation that incorporates dedicated residential amenities and facilities.” [Our emphasis.]

The Development Plan Definition of Use Classes (Section 13.2) also quotes the definition of BTR provided by the Apartment Guidelines 2020:

“(i) Residential - Build to Rent Accommodation Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord. (Definition taken from section 5.2 of the DHPLG Section 28 Guidelines, Sustainable Urban Housing: Design Standards for new Apartments” (2020).”

According to these definitions BTR developments are ‘purpose built’ specifically for ‘long-term rental’, incorporates ‘residential amenities’ and is serviced by an ‘institutional landlord’. The proposed development fully accords with these definitions.

2.1.2 Policy PHP28: Build-to-Rent – Site Meets Locational Requirements

Policy Objective PHP28 of the Development Plan states:

“Policy Objective PHP28: Build-to Rent and Shared Accommodation/ Co-living Developments

It is a Policy Objective to facilitate the provision of Build-to-Rent in suitable locations across the County and accord with the provisions of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2020 (and any amendment thereof). Proliferation of Built to Rent should be avoided in any one area. As the HNDA does not support provision of shared accommodation

there shall be a presumption against granting planning permission for shared accommodation/ co-living development.” [Our emphasis.]

In summary, in relation to BTR Development, Policy Objective PHP28 has three criteria:

- Facilitate the provision of BTR in suitable locations;
- BTR must accord with the Apartment Guidelines; and
- Proliferation of BTR is to be avoided in ‘any one area’.

1. Subject Site is a Suitable Location for BTR

The subject site is an appropriate location for BTR development as it is a highly accessible location close to high quality public transport and it is zoned for residential development.

Appropriate Land Use

‘Residential - Build-to-Rent’ is Permitted in Principle in areas zoned objective MTC (Major Town Centre) and DC (District Centre); and Open for Consideration in areas zoned objective NC-subject to retaining a suitable range of uses (Neighbourhood Centre), A, A1 and A2 (Existing Residential areas, New residential areas, and Residential within the SUFP, respectively).

The site is a zoned Objective A and ‘Residential - Build-to-Rent’ is therefore an Open for Consideration use under this zoning objective. It is located within 1km of the lands zoned Major Town Centre in Dun Laoghaire and just over 1km to the District Centre at Blackrock. Open for Consideration are defined in the Development Plan as those:

“which may be permitted where the Planning Authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects, and would otherwise be consistent with the proper planning and sustainable development of the area.” [Our emphasis.]

The zoning objective A is *“To provide residential development and improve residential amenity while protecting the existing residential amenities.”*

The proposal provides for a high quality residential development of 493 No. units (of which 490 No. are BTR units) with associated residential amenities, several publicly accessible facilities (childcare facility, café/restaurant and public open space) and it has been designed to balance the proposed development with impacts on existing residential amenities. The critical difference between this development and a ‘conventional’ apartment scheme is the proposed occupancy and central management regime. BTR operators seek to retain their residents for long periods of time thereby creating established communities, even if a resident’s needs change over time and a different unit type is required within the scheme. Therefore, while residents may be renting there is the potential for a well settled community to develop.

The subject site has heretofore been a privately-owned single-family dwelling within a large private landholding close to high quality public transport. The lands have been underutilised, and maintenance of both the older structures and the landscape, including trees, has not been adequate.

The site is defined as being in a Central and/or Accessible Urban Location according to the Apartment Guidelines and is therefore, an entirely appropriate location for a BTR residential development. The subject site will provide a high quality living environment for the future residents of the scheme.

Site in Close Proximity to Public Transport

The site is connected to both, the city centre and other urban centres by high quality public transport. The entirety of the site is less than 1km/10 minutes walking distance of the high frequency public transport Dart Station at Salthill and Monkstown, with much of it far closer. The nearby bus stops on Monkstown Road are located closer to the site than the Dart.

The site's location relative to public transport is consistent with Section 4.3.2.4 of the Development Plan:

*"BTR shall be located **within a 10 minute walking time from high frequency public transport routes**. BTR will be considered as a **component part of achieving an appropriate mix of housing**, however, a proliferation of Build to Rent in any one area shall be avoided."*

The Apartment Guidelines, 2020 do not specify any locational requirements for BTR, however, the subject site is defined in the Guidelines as a Central and/or Accessible Urban Location having regard to the site's location relative to public transport and the Dun Laoghaire and Blackrock urban centres and is thus appropriate.

2. Accords with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020

As has been established in the Planning Application documentation, the proposed scheme accords with the Apartment Guidelines, 2020.

National policy guidance provided under *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020* (2020 Apartment Guidelines) recognises the significance and potential of Build to Rent (BTR) developments in accelerating housing delivery owing to the 'shorter timescale' of units which would be made available to the rental sector compared to the 'traditional' house building models. In this regard, the guidance states that:

"This potential for accelerated housing construction through BTR can make a significant contribution to the required increase in housing supply nationally, identified by Rebuilding Ireland, and the scale of increased urban housing provision envisaged by the National Planning Framework. The potential to augment existing housing delivery models by attracting new investment into the sector will assist in achieving additional housing output." (Section 5.8, 2020 Apartment Guidelines)

According to the 2020 Apartment Guidelines, BTR developments can be defined as:

'Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.' (Section 5.2, 2020 Apartment Guidelines)

As per Specific Planning Policy Requirement 7 (SPPR7), the development classified as BTR must be:

'(a) Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;

(b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as: (i) Resident Support Facilities - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc. (ii) Resident Services and Amenities – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.'

The proposed development does describe the scheme as Build to Rent in the statutory notices and the Application is accompanied by a draft legal covenant restricting ownership of the scheme for a minimum of 15 years.

With regard to the provision of resident amenities/support facilities, Section 5.11 of the 2020 Apartment Guidelines state that:

'While all BTR developments will be required to provide satisfactory resident support facilities, the nature and extent of the resident services and amenities may be agreed by the project developer and the planning authority having regard to the scale, intended location and market for the proposed development. The provision of specific BTR amenities to renters will vary and the developer will be required to provide an evidence basis that the proposed facilities are appropriate to the intended rental market.'

The proposed development includes a substantial range of residents support facilities and resident services and amenities, that in the future operator's experience will cater to the needs of the future residents of a scheme of this nature.

When the proposed BTR development meets the requirements of SPPR 7, there are a number of distinct planning criteria that are applicable to the proposed scheme as provided for under Specific Planning Policy Requirement 8 (SPPR 8):

- (i) *"No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;*
- (ii) *Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;*

- (iii) *There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures.*
- (iv) *The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;*
- (v) *The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.”*

The development complies with SPPR7 and SPPR8 of the 2020 Apartment Guidelines, as detailed in the application documentation.

The *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2022* (2022 Apartment Guidelines) came into effect on 22nd December 2022 and updated the 2020 Apartment Guidelines quoted above. The 2022 Guidelines removed SPPR7 and SPPR8, quoted above, which specifically relate to Build-to-Rent developments.

However, Part B of the Circular Letter NRUP 07/2022 issued by the Department of Housing, Local Government and Heritage on 21st December 2022, sets out a transitional arrangement in respect of BTR schemes, such as the subject Application, which were under consideration in the planning system at the time:

“Transitional Arrangements

All current appeals, or planning applications (including any outstanding SHD applications and appeals consequent to a current planning application), that are subject to consideration within the planning system on or before 21st December 2022, will be considered and decided in accordance with the current version of the Apartment Guidelines, that include SPPRs 7 and 8.”

Therefore, the 2020 Apartment Guidelines are the relevant Guidelines for the purposes of the assessing of the subject BTR development, and as detailed above, the proposed development fully accords with the 2020 Apartment Guidelines.

3. Scheme Does not lead to Proliferation of BTR in Any One Area

Development Plan Policy Objective PHP28 requires that the proliferation of BTR should be avoided “in any one area”. The term “in any one area” is not defined in this context. The 1km catchment referred to in Item 1 of the RFI is considered the ‘area’ for the purposes of the assessment of proliferation of BTR.

It is important to acknowledge that the Policy Objective does not refer to proliferation “in any one site”. Furthermore, the Development Plan does not identify a threshold in terms of the maximum number of BTR units which can be accommodated in any one BTR development. Therefore, the issue at question is the number of BTR units in the wider area, not within the site specifically.

³ These Guidelines introduces the Build-to-Rent residential model formally into the Irish planning system as a means to address the housing shortage. Prior to that the practice was not common, and there were no specific standards or requirements for such schemes, either through the County Development Plan, nor national standards.

2.1.3 Research Methodology

A search radius of 1km from the subject site boundary has been applied to determine the number of BTR schemes existing and permitted in the local area.

BTR schemes are required to be identified as such in the Statutory Notice accompanying the Planning Application. The ownership and operation of the scheme is restricted by planning condition, and typically further planning permission is required to use the scheme as a ‘conventional’ residential scheme where individual units can be sold to owner occupiers or smaller landlords. A search was carried out for Applications that refer to BTR in the Description of Development using the DLRC planning application search portal, the National Planning Application Database (NPAD), and An Bord Pleanála’s case search portal. The period targeted was from the publication of the 2018 version of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities*³ which formalised the concept of BTR development in Ireland, up to 26 June 2023 the date the research was carried out.

It was also necessary to identify the number of residential units within the catchment area in order to establish if there is a proliferation of BTR units or not within the area. This was done by utilising data from the EirCode ECAD Distribution Group, which identified the number of residential Eircodes within the catchment area (and excluded all business Eircodes). This methodology captures vacant dwellings, instances where a large house is split into a number of separate units and residential dwellings above commercial units; it excludes dwellings under construction which have not yet been allocated an Eircode.

2.1.4 Study Area - 1km Catchment from Site Boundary

The study area captures all lands within 1km of the site boundary, rather than a central point in the site, as seen in the figure below. There are 6,345 No. existing residential dwellings within this catchment area, which includes two Dart Stations (Salthill and Monkstown and Seapoint) and numerous bus services.



Figure 2.1: Subject site hatched in red, study area within 1km from site boundary identified with a red line. (Source: Myplan.ie, cropped and annotated by TPA, June 2023.)

1. Conventional Residential Developments in Single Ownership

‘Conventional’ apartment schemes owned and operated by a single landlord are not BTR schemes as per the definition of the Apartment Guidelines. However, for completeness efforts were made to identify such schemes.

There is no central register of such schemes, therefore a search was conducted by reviewing news articles and the RTB Register for apartment schemes in the catchment area, to identify if any single development was mostly or fully in rental use.

No ‘conventional’ residential developments owned by an institutional landlord were identified in the catchment area.

2. Live BTR Applications

As noted above, this information is not specifically required to satisfy RFI Item 1 but has been provided to provide a comprehensive response.

Two ‘live’ applications for BTR developments were identified within the 1km catchment area, both are Strategic Housing Development Applications (SHDs), which are before The Board for determination⁴. The two BTR developments under consideration comprise a total of 254 No. units.

Of the two proposed developments, the 108 No. unit development at Stradbroke House has been specifically identified in the statutory notices as ‘senior living apartments’ and therefore does not comprise conventional BTR units, as the occupation of the units is restricted to a particular group.

2.1.5 BTR Analysis: No Existing or Permitted BTR Accommodation within 1km of Site

No existing or proposed BTR developments were identified within the study area thus there is no proliferation of BTR accommodation within 1km of the subject site.

2.1.6 Further Research Conducted for Completeness

Although not required under Item 1 of the RFI, for the sake of completeness, two additional searches were carried out to inform this assessment. The two additional searches sought to identify developments within the catchment area that were:

1. Permitted as ‘conventional’ residential developments (i.e., developments which are not built specifically for long term rental, do not necessarily include any residential services or facilities, and the use of which is not constrained by planning condition nor legal covenant, and are not BTR as per the definition of the Apartment Guidelines nor Development Plan) but which are owned by a single landlord;
2. ‘Live’ planning permissions in the catchment area, these are neither ‘existing’ nor ‘permitted’ at the time of writing and are therefore not required to be included according to the wording of RFI Item 1.

⁴ The Decisions were due to be made on or by 28 March 2022 for ABP Ref. 31207021, and 1 November 2022 for ABP Ref. 31404122.

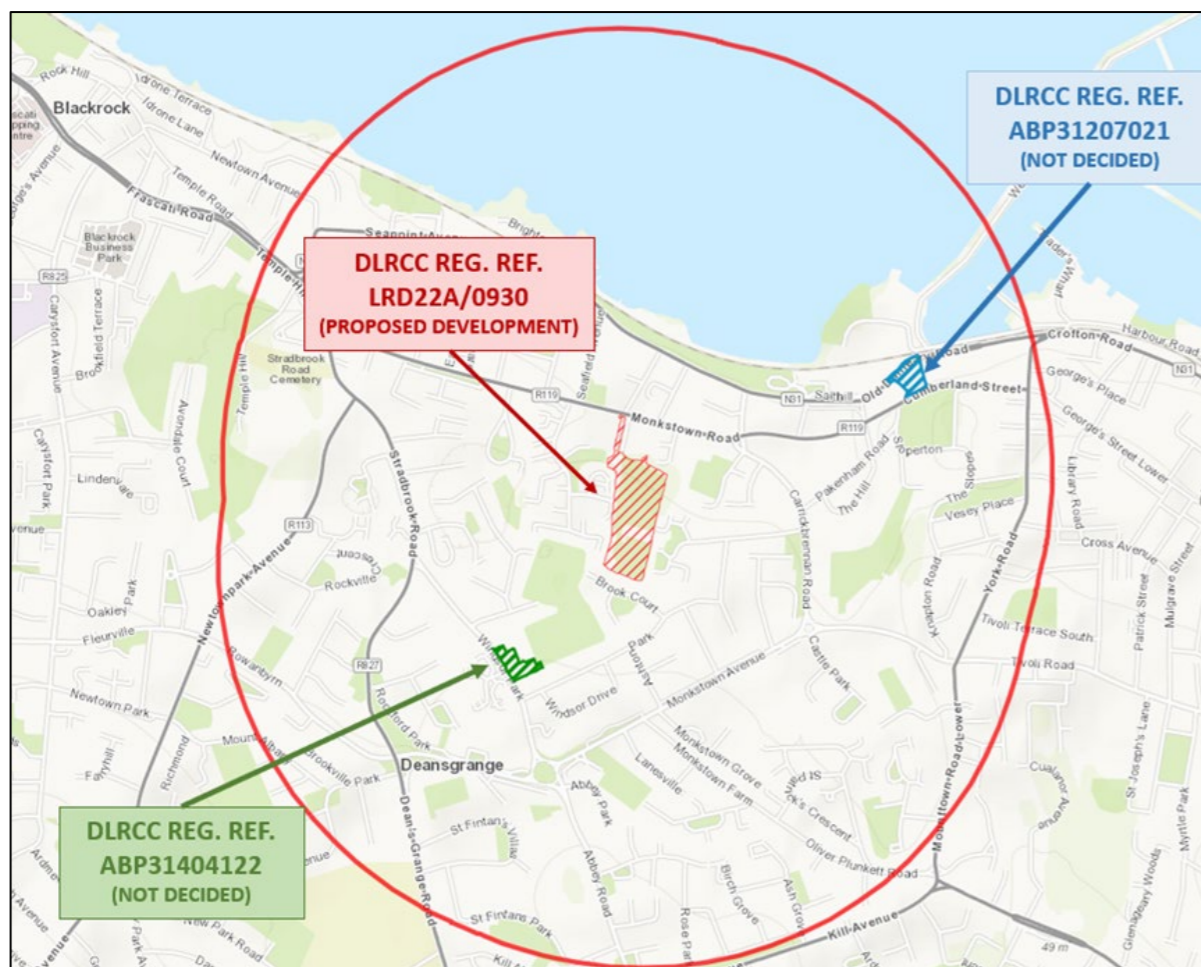


Figure 2.2: Locations of live BTR applications within a 1km search radius from the subject site, with approximate boundary of subject site highlighted in red. (Source: ESRI Basemaps, NPAD, cropped and annotated by TPA, 2023.)

2.1.7 Assessment of ‘Live’ BTR Applications

This study demonstrates that in addition to the subject development some 254 No. BTR units are proposed within 1km catchment.

These units are not guaranteed to be permitted and ultimately developed. However, if all the proposed BTR units within the catchment area including the subject scheme were developed, there would be a total of 744 No. BTR units in the catchment area, in addition to the 6,345 No. existing residential dwellings, and any new non-BTR residential development.

Unlike many parts of the functional area of Dun Laoghaire Rathdown County Council, large parts of the 1km study area are appropriate for BTR development due to the proximity of two Dart Stations, high quality bus routes and the urban centres at Monkstown village, part of Dun Laoghaire, Deansgrange.

The Development Plan (Section 4.3.2.4) confirms that BTR should be located “within 10 minute walking time from high frequency public transport routes”. Thus, not every part of the County is an appropriate location for the development of BTR and inevitably such developments would be concentrated around the principle public transportation routes such as the Dart, Luas and key bus routes.

The proposed BTR developments, if all were permitted and developed, which is not certain to occur, would increase the number of units in the area by an additional 11.7% (this figure excludes any ‘conventional’ residential schemes that may be permitted in the same period). The BTR units would amount to 10% of the new total of 7,089 no. units in the 1km study area. (Albeit this figure excludes ‘conventional’ residential units under construction without Eircodes, or permitted and developed in the same period, and the actual percentage may be lower).

The ‘live’ BTR developments, if permitted, would not constitute a proliferation of BTR in the area considering these units would comprise only up to 10% of the total units available and the study area is a suitable location for BTR development due to the proximity of public transport.

No Specific Unit Mix Required for BTR Applications

FI Item No. 1 requires the unit mix of ‘existing’ and ‘permitted’ BTR schemes to be identified. As before, there are no existing or permitted BTR schemes in the area.

However, again for completeness, the proposed but not yet permitted BTR schemes are assessed in Table 2.1 below.

In each of the BTR schemes, 1-beds units are the most common unit type. The subject development has a proportionally greater number of 2-bed units, than the other schemes, and is also the only development to include 3-bed units.

The *Housing Market Report Dún Laoghaire–Rathdown and Monkstown*, prepared by KPMG, dated October 2022 and enclosed with the Planning Application documentation, assessed the housing market in Monkstown compared to Dun Laoghaire Rathdown and national figures. That Report assessed the 4 No. EDs that best reflect the Monkstown area, see Figure 2.3 below. The 1km catchment area that informed the *BTR Analysis Report* captures the vast majority of these 4 EDs and additional lands, see Figure 2.4 below for comparative boundaries.

The KPMG Report notes that the average household size for Monkstown (2.5 persons) is lower than the average for Dún Laoghaire-Rathdown (2.77 persons) and State (2.75 persons), with 1- and 2-person households comprising 60.9% of all households. Therefore, the proposed development will cater for the majority of household types in Monkstown and would potentially provide alternative accommodation that meets the needs of existing households, within the same local area.

The subject site provides a more varied mix of units than the other proposed BTR schemes, with a greater proportion of larger units (2 and 3-beds at 40.6%, compared to 23.6%). The proposed scheme will meet the needs of the majority of existing households in the area.

Table 2.1: Live BTR Applications Including Subject Scheme					
Development Proposed	Studio	1-beds	2-beds	3-beds	Total Units
Stradbrook House, Blackrock - Senior Living(ABP-314041-22)	0	83	25	0	108
Ted Castles Site and Dun Leary House (ABP-312070-21)	34	77	35	0	146
Subtotal (BTR Schemes Excluding Subject Development)	34 (13.4%)	160 (62.9%)	60 (23.6%)	0	254
Dalguise House (LRD22A/0930) excluding 3 no. conventional 3-bed houses	2 (0.4%)	289 (59%)	186 (38%)	13 (2.6%)	490
Total Proposed Units	36	449	246	13	744
(% of total proposed units)	(4.8%)	(60.3%)	(33.1%)	(1.7%)	



Figure 2.3: The Monkstown catchment used in *Housing Market Report Dún Laoghaire–Rathdown and Monkstown*, prepared by KPMG, dated October 2022, comprising the 4 No. EDs that best reflect the Monkstown area. (Source: KPMG, 2022.)

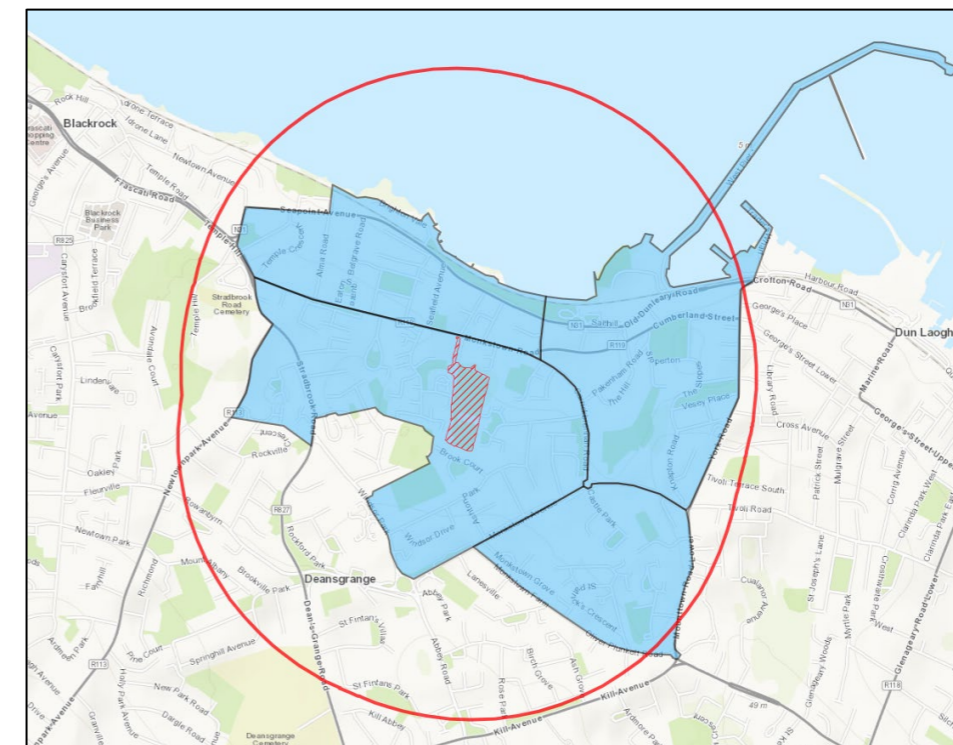


Figure 2.4: Comparative catchment areas – 1km BTR Study Area compared to 4 EDs assessed by KPMG *Housing Market Report*. (Source: TPA, 2023.)

2.1.8 Likely Shortfall in Housing in Area Identified

The KPMG *Housing Market Report Dún Laoghaire–Rathdown and Monkstown Report*, dated October 2022 identifies that there is an anticipated shortfall of c. 3,200 units in the area by 2028:

“The current residential planning pipeline for Dún Laoghaire–Rathdown comprises 15,007 units across 114 schemes. The Core Strategy for DLR identifies that there will be a requirement for an additional 18,515 residential units in the area by Q1.2028 (Q2.2022-2028), based on estimated completions for 2021-2022. As only c.32% of the pipeline units have commencement notices and historic completions rates within the Local Authority are low, we note that a shortfall of c. 3,200 units or more in Dún Laoghaire–Rathdown may be anticipated within the area by 2028. [Our emphasis.]”

One of the acknowledged benefits of BTR development noted in the Apartment Guidelines 2020 is that BTR allows for accelerated delivery of new housing:

“A key aspect of the BTR is its potential to accelerate the delivery of new housing at a significantly greater scale than at present. For traditional housing, the pace of development is largely determined by the rate at which individual homes, including apartments, can be sold. With BTR, once constructed, the overall scheme is available to the rental sector over a much shorter timescale on completion and the investment model is therefore capable of delivering a much higher volume of housing than traditional models.” [Our emphasis.]”

The subject site has complexities due to the presence of the Protected Structure, the mature trees to be retained, significant level changes, existing and proposed access points. It is a site that would be well served by a strong central management regime facilitated by BTR use. Were the proposed development a ‘conventional’ apartment scheme, there would be less certainty of delivery and the risks to development increased.

2.1.9 Conclusion – No Existing or Permitted BTR in Area, No Over-Proliferation of BTR

The proposed development does not result in a proliferation of BTR accommodation. There are no existing or permitted BTR developments in the area.

However, having also assessed proposed BTR schemes that may be permitted in future the study identified two other proposed BTR developments within 1km of the site, one of which is targeted at senior living. Were all three BTR schemes to be permitted, they would amount to c. 10% of the total number of units in the study area across 3 separate sites. The area would still include a vast majority of existing rental (non-BTR) properties and owner occupied units.

The subject proposal has a greater number and proportion of 2-bed and 3-bed units than the other proposed BTR Schemes, which will potentially attract a wider range of household types to the proposed development.

The proposed development is at an ideal location to support a BTR development due to its proximity to high quality public transport, accessibility to employment centres and services. The proposed development will include high quality facilities for residents, in addition to providing additional services to the public (including public open space, a childcare facility, a café/restaurant, and public access to Dalguise House and the associated grounds, which has heretofore never been available). As the scheme is a BTR development it can be delivered faster than a ‘conventional’ housing scheme relying on sales to fund further phases.

No existing or proposed BTR developments were identified within the study area, thus, there is no proliferation of BTR accommodation within 1km of the subject site.

There are two other BTR developments in the planning system. If these schemes were to be permitted it would still not constitute a proliferation of BTR in the area due to the number of units proposed relative to the total number of residential units in the area.

The subject site provides a more varied mix of units than the other BTR schemes in the study area, with a greater proportion of larger units (2 and 3-beds at 40.6%, compared to 23.6%). The proposed scheme will meet the needs of the majority of existing households in the area.

As a BTR Scheme the proposed development is more likely to be delivered within a reasonable timeframe than a build to sell scheme, which would most likely be delivered in phases as units are sold. The proposed development will therefore more likely contribute to housing need in the area at a time when housing targets are not being met either locally or nationally.

3.0 FURTHER INFORMATION ITEM NO. 2 –BLOCKS I1 AND I2 – ACTIVE LIVING UNITS

“The applicant has offered the future adaptability of Block I1 and I2 for later living residents. The Planning Authority refers to Section 39(2) of the Planning and development Act, 2000 (as amended) which notes the following:-

‘Where permission is granted under this Part for a structure, the grant of permission may specify the purposes for which this structure may or may not be used, and in case the grant specifies use as a dwelling as a purpose for which the structure may be used, the permission may also be granted subject to condition specifying that the use as a dwelling shall be restricted to use by persons of a particular class or description and that provisions to that effect shall be embodied in an agreement under Section 47’.

In this regard the applicant is requested to indicate their willingness to enter a Section 47 agreement with the Local Authority restricting the use of the apartments to persons of a particular class or description. In this regard the Applicant is also requested to give details of the particular class or description in intended residents e.g., age profile.”

3.1 Applicant’s Response to FI Item No. 2

This response to Item No. 2 has been prepared by Tom Phillips + Associates in conjunction with the Applicant.

3.1.1 Future Adaptability Refers to Potential Future Build to Sell Units, Not Active Living Units

The references to ‘future adaptability’ in the Planning Report and the Architect’s Design Statement were made in the context of describing the mix of tenure and future flexibility within the scheme. The scheme includes Part V units, units which (subject to works and planning permission) might be adapted for use as Build-to-Sell units in future, and the Block I units were identified as Active Living Units.

The reference to ‘future adaptability’ describes the potential of certain Blocks to be converted to Build-to-Sell standards at some point in the future, subject to further works and planning permission.

The identification of Blocks I1 and I2 as ‘Active Living’ units refers to the future operator’s intention to market these blocks at older residents, not that any further works would be carried out to adapt these units to any particular cohort.

3.1.2 Greystar’s Active Living Communities – Senior Housing Redefined

Greystar, the intended operators of the proposed development, is the largest developer and manager of active adult apartment homes in the US. These purpose-built communities are filling a void for the growing 55+ demographic by offering a quality, customer-oriented living experience for their specific needs.

Unlike full-service independent living communities with mandatory meal programs and other required services, Greystar active adult apartment homes enable residents to live a maintenance-free, “lock-and-leave” lifestyle with the added advantage of à la carte services when and as sought. Services combine with social engagement opportunities to enable residents to stay connected, meet new friends, and engage in all life has to offer.

Across the active adult platform, resident retention, resident satisfaction, and team member engagement are consistently ranked among the highest within the Greystar’s global portfolio as well as within senior housing industry peers.

Examples of Greystar operated and owned active adult developments –

<https://www.liveoverture.com>

<https://liveeverleigh.com>

<https://www.albumlife.com>

Greystar Active Adult Scheme in Focus – Everleigh Forestwood

Everleigh Forestwood is a 55+ apartment community located in Dallas, Texas, operating since 2018. The community is designed for active adults seeking a luxurious and convenient lifestyle. Everleigh Forestwood offers a variety of amenities, including a resort-style pool, fitness centre, yoga studio, business centre, library, game room, and theatre room. The community also has a variety of social activities and events planned throughout the year.

The Everleigh Forestwood community is close to a variety of neighbourhood shopping, dining, and entertainment, public transport and major roads allowing for easy access.

The scheme is a great option for active adults who are looking for a luxurious and convenient lifestyle. The community offers a variety of amenities and activities that will keep residents busy and engaged.

Some of the features of Everleigh Forestwood:

- 190 No. one and two bedroom apartment homes;
- C. 1,015 sq m clubhouse with a pool, fitness centre, yoga studio, business centre, library, game room, and theatre room;
- Variety of social activities and events planned throughout the year;
- Convenient location close to shopping, dining, and entertainment options;
- Close to public transport and highways, providing for ease of travel.



Figure 3.1: Images of Greystar development at Everleigh Forestwood, Texas. (Source: Greystar, 2023.)

3.1.3 Blocks I1 and I2 Designated as Active Living Units

The Applicants have elected to market Blocks I1 and I2 to the Active Living cohort, i.e., residents who are 55+ years of age. Blocks I1 and I2 are 3 storey blocks, containing 24 No. units (12 No. in each Block) are located by the rear boundary of the site. Surface level car parking is available at ground level near these Blocks for ease of access for residents with cars, and secure cycle parking shelters are also provided in the vicinity. These blocks are consistent with the standards of the Apartment Guidelines, 2022 apart from the provision of open space for the ground floor units.

Due to the smaller scale of the blocks and their location in a quieter part of the site, behind the walled garden, it is considered that this location may be attractive to more mature residents. These residents may be accustomed to living in larger family houses and wish to downsize to meet changing needs and reduce the upkeep associated with larger homes. This is a large demographic in Greystar’s portfolio of Active Living assets in the U.S. whereby the majority of residents select a Greystar community due to their preference for smaller scale settings with other residents sharing similar life experiences and situations.



Figure 3.2: Extract of Site Plan Extract identifying Blocks I1 and I2 in the context of the southern part of the subject site. (Source: RAU, 2023.)

This age group is a growing demographic in Ireland, and it is considered that the proposed development will be particularly attractive to active singles or couples attracted to the quality of the scheme itself and the easy access to the multitude of services and recreational activities in the Monkstown and Dun Laoghaire area.

It is not intended that such residents would be provided with any additional medical or social support. Although there would be nothing to prevent a resident employing private care services should they need to, like any other resident in the scheme. Like all residents, Active Living residents will be supported by the on-site operations team including maintenance, facilities, concierge and community manager.

3.1.4 No Restriction on Occupation of Blocks I1 and I2 Proposed By Condition

It is not proposed to restrict the occupation of any part of the scheme to any particular age cohort by way of planning condition. Such a restriction is not considered appropriate in the context of a housing shortage in case there is insufficient demand and certain units remain unoccupied for extended periods of time. Active Adult BTR is a relatively new form of tenure in Ireland and whilst the future operators of the scheme believe the proposed development will attract a wide range of people due to the quality of the accommodation and the supporting services and facilities, this has not been proven to date.

The operator intends to market the units in Blocks I1 and I2 to prospective residents aged 55+. The brochures, enquiry forms and communication shall detail that these units are designed and planned for that age cohort. For the first 12 months following completion of these units, the operator can commit that units shall only be let to residents that satisfy this age criteria.

However, given that this is an untested rental product, in the event that the interest from this cohort is not established, following the initial 12 month period the operators will let to residents who do not fulfil the original age criteria for any units that remain vacant.

In summary, the Applicant does not propose to restrict the occupancy of the Block I units by way of a Section 47 agreement. However, the Applicant intends to restrict the marketing of the units for 12 months.

4.0 FURTHER INFORMATION ITEM NO. 3 – FUTURE ADAPTABILITY

“The applicant has stated that Blocks H, I1 and I2 and the Coach House could be purposed as ‘Build-to-Sell’ units as described by the applicant. However, these Blocks and the Coach House units do not comply with the criteria set out in the Apartment Guidelines and County Development Plan 2022-2028 (Chapter 12), in respect of mix of units, open space, private amenity space, parking proposals, storage etc. The Applicant is requested to submit revised details/ drawings which clearly sets out how Blocks H, I1, I2 and the Coach House meet these standards.”

4.1 Applicant’s Response to FI Item No. 3

The response to this Item has been prepared in conjunction with Reddy Urbanism and Architecture. It should be read in conjunction with the *Response to Further Information Report* prepared by Reddy Urbanism and Architecture, which provides further details and illustrations.

Current Planning Application Proposes a BTR Development

At the outset we note that the proposed development comprises BTR (Build-to-Rent) units, and the Planning Application included a Draft Legal Covenant, which states that it is intended to operate the proposed development as a BTR development for 15 years (apart from the three NW Houses). The proposed units are compliant with the relevant standards applicable to BTR units.

Further planning permission would be required to convert the BTR units to BTS (Build-to-Sell). In fifteen years the applicable National design standards for apartments, and the Development Plan standards for apartments and residential development will likely have evolved further. However, an assessment of the proposed units in the context of the current standards is provided, albeit any such proposed change to the use of the units is not anticipated in the near future.

Build to Sell Enabled Subject to Further Planning Application and Obtaining Planning Permission

The Blocks identified in the Planning Application as being Build to Sell enabled are in Blocks H, I1, I2 and the Coach House.

With relatively limited changes these Blocks could be brought to Build to Sell standards, as per the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2022*. The units meet the requirements of the Apartment Guidelines in terms of storage sizes, bedroom and living room sizes, etc. as illustrated in the Housing Quality Assessment prepared by Reddy Urbanism and Architecture.

The *Response to Further Information Report* prepared by Reddy Urbanism identifies that a minimum of 50% of the units in these Blocks exceeds the minimum overall unit size by 10%. It also notes that, subject to the addition of further balconies, the units would also have adequate private open space. Sufficient public and communal open space is provided as detailed in the Cameo Partners Landscape Architects *FI Response Report*.

Car Parking

Car parking is provided across the site, including at surface level towards the south of the site where there is no basement car park. As a BTR scheme, the standard spaces will be available to residents according to the operator policies in place. If the units were to become BTS units in future, the provision of car parking for BTS units would depend on the then applicable Development Plan car parking

standards. It should be noted in this regard that the rear of the site is within 1km of the nearest Dart Station and thus all future residents irrespective of tenure will benefit from a high level of accessibility.

Unit Mix

In terms of unit mix, there is no unit mix requirement for BTR Units and the proposal is consequently compliant in that regard.

In respect of BTS schemes, the current Development Plan provides at Table 12.1 that any residential development of 50+ units at an ‘Existing Built Up Area’ should include no more than 30% 1 beds and studios and a minimum of 20% 3-bed units.

The unit mix in Blocks H, I1, I2 and the Coach House is as follows:

Table 5.1 – Unit Mix Selected Blocks					
	Studios	1-beds	2-beds	3-beds	Total
Block H	0	30	22	2	54
Block I1 and I2	0	6	18	0	24
Coach House	0	1	2	0	3
Total No. (%age of Total)	0	37 (45.7%)	42 (51.9%)	2 (2.5%)	81

The unit mix in these Blocks do not meet the current Development Plan requirement for BTS developments and any proposed development to convert these Blocks to BTS use would need to include a proposal to reduce the number of 1-bed units and increase the number of 3-bed units.

Reddy Urbanism and Architecture have designed the apartment blocks to facilitate flexibility in future, whereby two adjoining 1-beds could be combined to create a 3-bed. This would reduce the number of 1-beds whilst increasing the provision of 3-beds. However, the purpose of these diagrams is only to illustrate the future flexibility of the development/



Figure 5.1: Typical Floor Plan of Block H, identifying two adjoining 1-bed units, which could in future be combined to provide a 3 bed unit. (Source: RAU, 2023.)

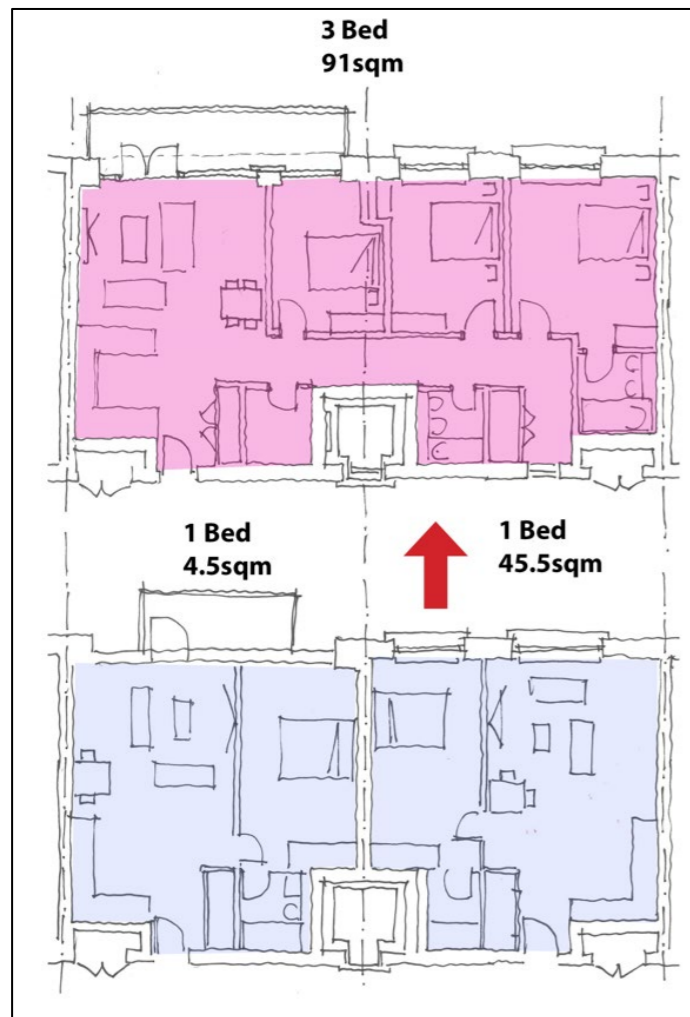


Figure 5.2: Diagram showing how two adjoining 1-bed units, could in future be combined to provide a 3 bed unit, this would require changes to the internal layout and a larger balcony. (Source: RAU Diagram, 2023.)

Conclusion – Further Planning Permission would be Required to Convert Units to BTS

The proposed development consists primarily of a BTR Scheme (with the exception of the 3 No. NW Houses), as described in the Statutory Notices and supported by the Draft Legal Covenant. The scheme is consistent with the standards applicable to BTR developments. The *Development Plan* also acknowledges that derogations from unit mix (and other standards) may apply for BTR schemes, Section 12.3.6 states:

“Where any derogations in standards including standards relating to unit mix, open space, car parking and storage are availed of, a condition should be attached to any grant of permission to state that planning permission must be sought for a change of tenure to another tenure model following the period specified in the covenant.” [Our emphasis.]

A Condition restricting the BTR Units to BTR use is anticipated and invited by the Applicant since derogations from Development Plan standards have been relied upon.

Any proposal to convert the selected Blocks referred to in this Item (or other BTR Blocks) to BTS would require further Planning Permission. Such a proposal would likely require proposed amendments to bring the development (or part thereof) into compliance with the residential standards in place at that time, at which point full compliance with residential standards in place at that time could be assessed.

The Applicant’s intention is to develop and operate a BTR development, as detailed in the Planning Application documentation. However, the development has been designed in such a way that there is some flexibility in future, so that should the owner wish to convert parts of the scheme to ‘conventional’ residential use this could be accommodated.

The proposed development is primarily a BTR scheme, but it includes Part V units, units aimed at older BTR residents and units that could in future, with some further adaptation, become BTS units. It therefore caters to the needs of a wide range of future occupants. As detailed in the Responses to FI Item 1 above relating to the potential proliferation of BTR accommodation above, the proposed BTR use has advantages in that the delivery of the scheme will be quicker than if it was a BTS development that required phased sales to fund future phases of development.

5.0 FURTHER INFORMATION ITEM NO. 4 – BLOCKS B, C, E AND F

“Following detailed assessment, the planning authority have serious concerns in relation to the proposed building heights of some of the proposed blocks and it is considered in the case of Block B, C, E, and F that these are visually overbearing resulting in adverse impacts on the visual amenity of the area and residential amenities of the surrounding dwellings and on the setting of the protected structure. In order to address this, the Applicant is requested to consider revising Blocks B, C, E, and F.

The Planning Authority consider that a reduction in the height of each of the proposed blocks is required in order to address the adverse visual impact of same. In the case of Block E this may require some redesign in order to provide for block of a high-quality architectural design.

The Applicant is requested to submit updated LVIA (Landscape And Visual Impact Assessment) in respect of any revised design proposals.”

5.1 Applicant’s Response to FI Item No. 4

The response to this Item should be read in conjunction with the following information submitted with this Response to Further Information:

- Reddy Urbanism and Architecture, see the enclosed *Response to Further Information Report – Design Statement* which provides further detailed response and illustrations
- Metec Consulting Engineers, Daylight, Sunlight and Shadowing Assessment
- Redline Studios, Photomontages, Volume 3 of the enclosed EIAR
- Macroworks, Landscape and Visual Impact Assessment (Chapter 13 of the enclosed EIAR).

Reddy Urbanism and Architecture’s assessment includes comparative Site Sections and Site Layout Plan, which compare the proposed development to the previous SHD scheme, which was permitted by The Board before the Decision was quashed. The building heights are similar to the previous scheme, with no notable increase in overall height despite the increased number of floors proposed at some locations. This is largely a result of the difference in proposed ground levels. In some cases, such as Blocks B, C towards the northeast and H, towards the southeast of the site the height of the building is reduced when compared to the previous scheme.



Figure 6.1: Cross Sections of current scheme with the previous scheme outlined in red. (Source: RAU, 2022.)

Blocks B and C are at the northern end of the site, whereas Blocks E is the central block and Block F is located along the eastern side of the site. Ground levels change significantly between the location of Blocks B and C compared to the more central Blocks E and F, these Blocks have relationships with different nearby dwellings. Each of these areas is examined below.

5.1.1 Blocks B and C – Northern End of the Site

Existing Context

Block B and C are located at the northern end of the site to the north of the existing avenue, close to Block A. The ground in this location is lower than that to the south and west of the existing avenue. In this part of the site there are a number of large trees to the north and east along the site boundary, and to the south along the existing avenue, many of which are to be retained in the proposed development.

Alterations Made at Further Information Stage

Alterations have been made at Further Information Stage to soften the appearance of these buildings, the colour tone of the upper level of Blocks B and C has been altered this allows for more differentiation between these Blocks and others within the scheme, particularly when the buildings are viewed from a distance. Some of the windows were designed to appear to be double height, but have been redesigned so they are clearly single height, resulting in a more human scale, particularly when seen from nearby.

The space between Blocks A and B which includes the main vehicular entrance to the basement and the pedestrian route between the Purbeck entrance and the rest of the site at a higher level has also been subject to significant redesign to give greater visual prominence to the pedestrian route thereby inviting people to move into the site at the upper level. Additional fenestration has been introduced to the lowest level of Block A (the childcare facility) to create a more open and active appearance.

The stairs between Blocks A and B is considerably wider and presents a more sculptural and landscaped route into the scheme. An accessible route is available via a lift attached to Block A, which is accessed from the outside of the building and will therefore serve any person seeking an alternative to the stairs. The entrance route to the basement car park has been relocated to a less prominent location under Block B. The vehicular route to the basement car park has been moved to a position under Block B, reducing its prominence.



Figure 6.2: Previous Application Stage Stairs and Basement Access proposed at Purbeck between Blocks A and B. (Source: Modelworks, 2022.)



Figure 6.3: Further Information Stage CGI showing updated warmer coloured materials, and the rearrangement of the stairs and vehicular basement access proposed at Purbeck between Blocks A and B. (Source: Modelworks, 2023.)

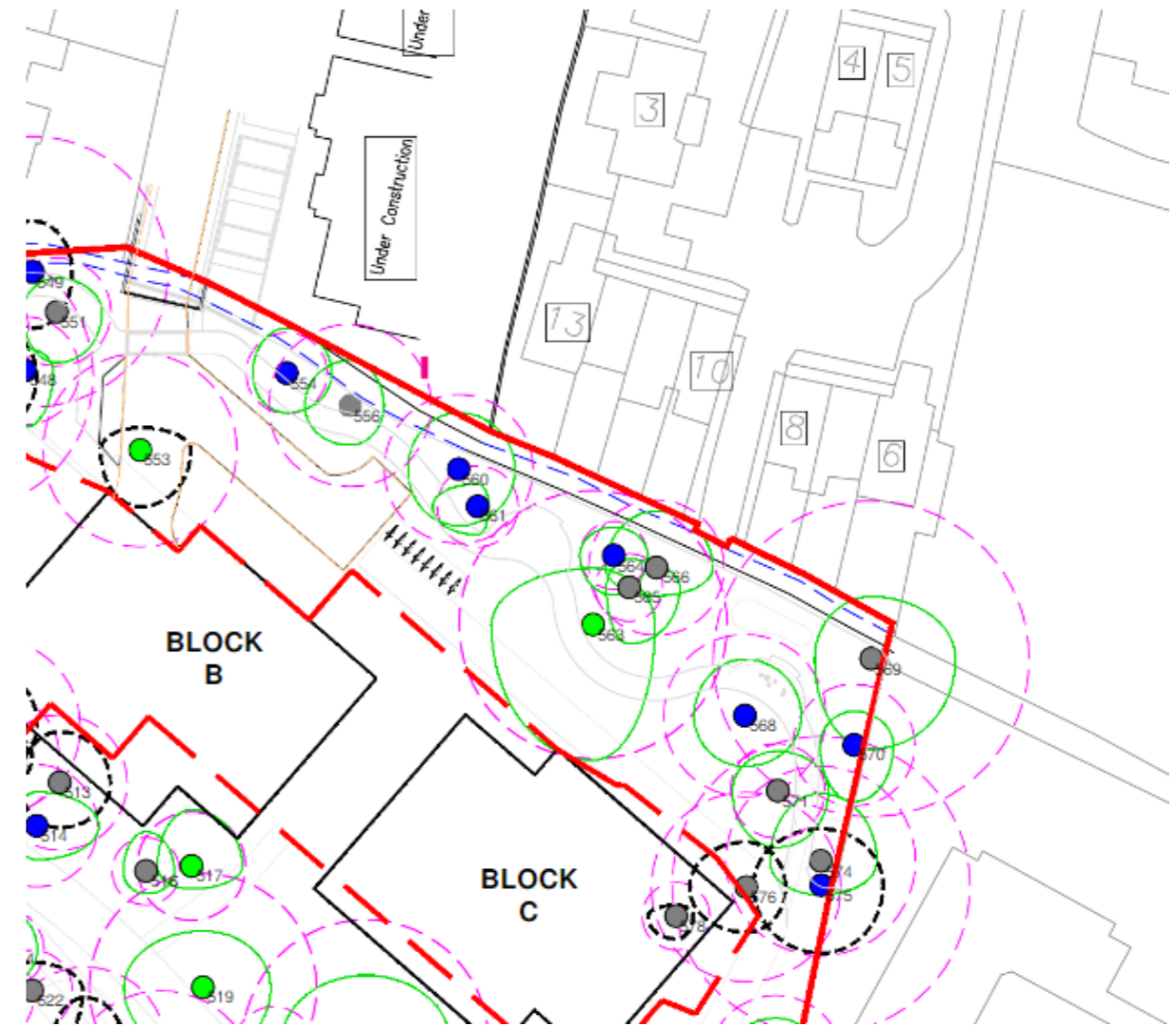


Figure 6.4: Extract of Arboricultural Impact Assessment Plan (Further Information Stage), showing trees to be retained (extent of canopy indicated by solid green line) between Blocks B and C and the adjoining houses to the north at Heathfield and Purbeck. (Source: Leinster Tree Service, 2023.)

Assessment of Proposed Development

Blocks B and C are both 7 storeys over undercroft. The buildings are situated in a depression, with ground rising to the south to the existing avenue, and to the north towards Monkstown Road.

The existing trees along the northern site boundary, between Blocks B and C and the adjoining dwellings to the north at Purbeck and Heathfield to the east of the proposed entrance at Purbeck, are to be retained. Those trees will continue to provide a screen between the existing dwellings and the new development, particularly those at Heathfield where many of the rear gardens face southward towards the site.

At Purbeck the existing houses are orientated east west and there will not be direct views from the houses to the subject site. Again, the trees between the garden of the last house at Purbeck and the subject site are retained and will screen the new buildings. The existing trees to be retained will prevent overlooking of existing adjoining dwellings and prevent an overbearing impact.

Due to differences in levels, the distance and intervening existing structures and planting there will be limited or only glimpsed views available of the site from Monkstown Road. The view from Monkstown Village again is very limited and distant. The main impact will be as the site is approached from Purbeck but this view will be glimpsed from Monkstown Road, apart from those entering Purbeck and the site itself.

Views 2-4 of the Photomontages (Volume 3 of the EIAR) relate to views from Monkstown Road to the south of the site. The LVIA provides a Description and Magnitude of Visual Impact for each of these views.

Of these views, the greatest impact is from Purbeck (View 3) which provides the vehicular access to the proposed development. The residual significance in respect of that view is defined as Moderate-Slight. However, the description and magnitude of visual impact, in the LVIA also notes that the apartment buildings do not appear overbearing nor create overlooking from this Purbeck view:

“Whilst prominent, the proposed apartment buildings are of a high quality of design and finish and did not appear overbearing in this visual setting. Nor do they appear to overlook any of the properties within the foreground to a noticeable degree and this is partly because the rear yards of these dwellings are oriented in a different direction (east rather than south).”

For View 2, the LVIA defines the residual significance in respect of that view is defined as Slight, and notes that the proposed development results in:

“marginally increased sense of enclosure to the south, but this has little bearing on visual amenity in the immediate street scene”

In respect of View 4, the LVIA defines the residual significance in respect of that view is defined as Slight and states that the proposed development results in:

“The apartment blocks are not a strongly apparent feature from here, but they do provide a sense of enclosure to the southerly vista and with that an increased intensity and scale of development within the scene. However, the development does not detract from the visual amenity of the street scene to more than a marginal degree”.

Furthermore, Block B and C do not have an impact on the sunlight and daylight available to the dwellings at Purbeck and Heathfield to the north due to the intervening trees and the distances between the proposed and existing buildings.

Conclusion – Blocks B and C

The LVIA demonstrates that Blocks B and C are not visually overbearing, nor are the residential amenities of adjoining residents adversely impacted. The proposed development will be a new intervention in the landscape but the majority of the existing houses along the northern boundary were also infill developments that post date the earlier houses along Monkstown Road.

It is considered that Blocks B and C will not have an overbearing impact on the adjoining dwellings. The buildings as amended in this Further Information are high quality structures. The proposed warmer tones will better suit the surrounding context. In closer views of Block B, the rearranged space between Blocks A and B will provide a more generous landscaped pedestrian link to the main avenue beyond.

5.1.2 Block E – Central Location

Existing Context

Block E is the most central Block within the site, at the greatest distance from all boundaries, and therefore the preferred location for additional building height. It also faces Dalguise House across the central open space. The overall height of Block E is only marginally higher than the previously considered scheme, at +53.3m due to the green roof build up.

It is in the hub of the proposed development as it provides residential amenities at the Ground and First Floor Levels and at the top floor, including an outdoor terrace at Ground Level and one at Eighth Floor Level.

Alterations Made at Further Information Stage

The design of Block E which is to the north of Dalguise House has been altered to provide double height glazing at Ground and First Floors, which better balances the appearance of the Block.

Increased glazing has been added to the top level and the tonal change made to reduce the ‘visual solidity’ of the building. Furthermore, the tones used in Block E materials is different from the other blocks in order that the blocks do not read visually as one building.

Assessment of Proposed Development

Block E has no direct relationship with adjoining dwellings and does not impact on the residential amenity of those dwellings due to distance to boundaries, intervening buildings and vegetation, it furthermore could not be considered to have a visually overbearing impact on adjoining dwellings.

The Photomontages (Volume 3 of the EIAR) show that Block E, as the highest Block, is visible from a distance (see Views 12-14 for example, Blackrock Rugby Club, Dun Laoghaire West Pier and Monkstown Village, respectively). However, the residual significance in respect of those views is defined in the LVIA as Slight, Slight and Imperceptible, respectively. Therefore, no adverse impacts on the visual amenity of the area arising from longer distance views.

The LVIA notes that the highest levels of effect occur relatively close proximity to the site.

“Given their proximity and lower density residential context, it is testimony to the appropriately designed scale and form of the proposed development as well as the high degree of perimeter screening, that impact significance is not greater than Moderate-slight. Despite the tallest of the proposed apartment blocks rising above and between intervening treetops, these are centrally located within the site affording increased distance buffering and there is not an undue sense of overbearing or overlooking of residential properties in any of the views.”

“From the more sensitive receptors within the Monkstown ACA and from the Martello Tower at Seapoint, the proposed development tends not to be visible at all or is seen as back-lands development along south oriented access lanes from Monkstown Road. From the more distant viewpoint 13 on Dún Laoghaire West pier, within its unimpeded fore-to-middle ground, the

tallest blocks are seen to rise into view above the handsome heritage terraces that front the coastal corridor, but against a backdrop of the Dublin Mountains. Whilst this is a negative impact it is not a particularly noticeable one and there is a distinct sense of setback from the sensitive coastal context.”



Figure 6.5: View 13 Dun Laoghaire Pier looking southwest Winter Baseline. (Source: Redline Studios, 2023.)

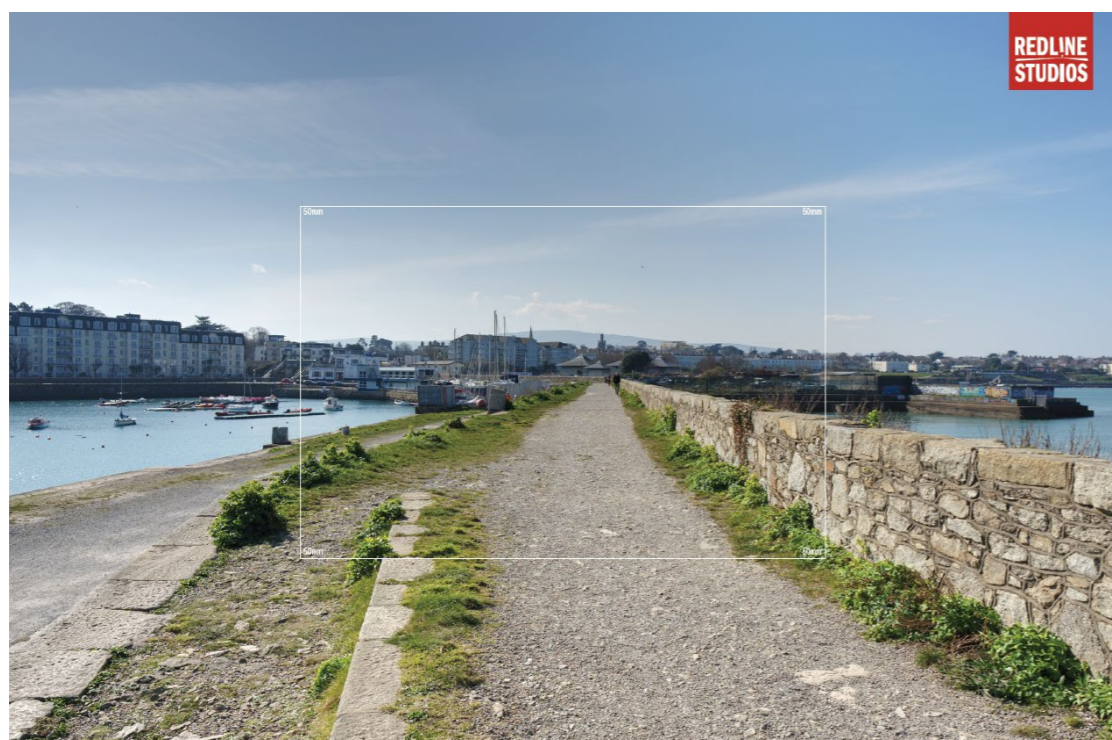


Figure 6.6: View 13 Dun Laoghaire Pier looking southwest Winter Baseline. (Source: Redline Studios, 2023.)

Conclusion - High Quality Architectural Design

Block E is a high quality building, that provides the core of the scheme both in terms of being the tallest building within the site in addition to accommodating the majority of the residential amenities and facilities. The changes to the colour of materials proposed results in Block E having a lighter appearance.

It has no visually overbearing impact on adjoining dwellings, nor impact on the residential amenities of the area, as Block E is not located in proximity to any of the existing dwellings in the area. The tonal changes introduced will differentiate this building from the others, thus ensuring it does not appear as a larger building within the site.

5.1.3 Block F – Eastern Boundary

Existing Context

Block F forms the eastern side of the central space, to the east it has a relationship with the main avenue which curves to the east before turning in front of Dalguise House and beyond that to houses at Richmond Park. The eastern site boundary is currently defined by a Leylandii trees.

Alterations Made at Further Information Stage

The colour of the external materials of Block E compared to those of Blocks F and G have been altered to ensure the buildings are more distinct when seen together, including when seen from the east of the site. The uppermost level is a warmer colour.

The new planting along the eastern boundary in place of the leylandii hedge has been updated further to ensure that the trees to be planted are larger at the outset and include a mix of deciduous and evergreen trees (the former are faster growing, and the latter provide winter screening). The proposed trees are more suitable for a residential setting than the leylandii hedge, which was planted too close to the boundary wall and is causing conflict with neighbouring properties resulting in inappropriate pruning.

Assessment of Proposed Development

The impact of Block F on the nearest exiting dwellings to the east is illustrated in Views Nos. 5, 6, 7 and 8 of the enclosed Photomontages, which are taken from New Alma Place (former Cheshire Homes site) and three different locations in Richmond Park.

As part of this Response to FI, additional photomontages for View 6 have been provided to show the short, medium and longer term views for both summer and winter time.

The LVIA defines the residual significance in respect of the view from New Alma Place (View 5) as Moderate-Slight. Although, we also note that proposals have been made to redevelop this site, which if constructed would alter the future views. The LVIA states in respect of these views that:

*“The nearest south-eastern blocks of the proposed development will be seen to rise above and between the vegetation beyond the nursing home building at a modest distance. **They are of a high standard of design and material finish and have a generally light construction that does not appear overbearing in terms of height or massing. The apartment blocks contribute to an increased scale and intensity development within this low density residential setting, but do not appear out of place.** For these reasons the magnitude of visual impact is considered to be Medium-low and the quality of effect, Negative.” [Our emphasis.]*

The LVIA identifies that the residual significance in respect of the view from Richmond Part 2 (View 7) is Slight and Richmond Park 3 (View 8) is Negligible. The LVIA states in respect of these views that:

*“Again, both summer and winter views have been prepared in respect of this scene and during summer months the proposed development will be barely discernible through the trees in the near distance. During winter months it will become more apparent, but it is still filtered through a heavy veil of winter branches. In both cases, the effect is more a sense of enclosure to the west than a clear view of the proposed development. **There is a marginal degree of increased build development, but this has little impact on visual amenity in this context.** For these reasons, the magnitude of visual impact is deemed to be Low and the quality of that effect is to be negative.”* [Our emphasis.]

and

*“A very small section of the proposed development can be seen in gaps through the stand of conifers that encloses this cul-de-sac. There will also be some removal of conifers at the southern end of the treeline, which serves to open up the setting slightly without introducing the view of any buildings beyond. Again, both summer and winter images have been provided for this view and although **there is a marginally clearer view of the development during winter months, it will have a negligible impact on the visual amenity experienced in this setting.** Consequently, the quality of the effect is also deemed to be Neutral.”* [Our emphasis.]

The LVIA assesses the 6 no. photomontages for View 6, the assessment identifies that the changes to the eastern boundary planting will be visible and that the impact will decrease as the planting is established and grows. In the long term, once the planting is established, the residual significance becomes Moderate in both winter and summer:

*“The nearest of the proposed apartment buildings rises above and just beyond the intervening line of semi-detached houses and is openly exposed due to the removal of the existing stand of large conifer trees from the boundary of the site. Prior to the establishment of new screen planting along this boundary, there will be a sense of scale conflict, overbearing and overlooking. However, **these effects will reduce as the proposed screen planting rises to form a visual and physical barrier between the dwellings and the proposed apartment building. The line of screening will also generate a stronger sense depth separation and scale transition between the existing dwellings and proposed apartment block.** In the Short-term (1-7 years) the proposed screening will have little ameliorating effect when viewed from here, but it is likely to be more effective from within the back yard of nearest residences as the planted heights of the trees will be around 6-8m depending on species. Nonetheless, the magnitude of visual impact immediately post-construction / planting is deemed to be High. This will reduce in the Medium-term (7-15 years) to High-medium and then to Medium-low beyond 15 years as the screen planting continues to mature.*

During winter months, the proposed screening, which consists of both broadleaf and coniferous trees will be less effective, particularly in the early years when the broadleaf trees outpace the slower growing conifers. Thus, winter effects will be slightly higher than summer effects in the medium term. By 15 years the conifers will be contributing to similar screening across the seasons.”

Whilst the proposed development will alter the existing environment, Block F is located at some distance from the nearest houses at Richmond Park and intervening tree planting, will reduce the visual impact for the closest dwellings overtime. Longer distance views will benefit from the proposed boundary planting, but also existing tree planting within the Richmond Park open spaces which also break the majority of direct views.



Figure 6.7: Extract of Winter Proposed View 06 – Year 15 Long Term (EIAR - Volume 3 – LIVA Photomontages, July 2023), view from Richmond Park looking west. Blocks F and E are visible but due to the difference in colour of external materials they do not read as one. (Source: Redline Studios, 2023.)



Figure 6.8: Extract of Summer Proposed View 06 – Year 15 Long Term (EIAR - Volume 3 – LIVA Photomontages, July 2023), view from Richmond Park looking west. Blocks F and E are visible but due to the difference in colour of external materials they do not read as one. (Source: Redline Studios, 2023.)

Conclusion

The design of the proposed development has been revised to ensure that the building reads as a separate structure to the other buildings within the site, thus differentiating between them, for example Block E and F no longer read as one mass due to the different coloured materials used in both Blocks. Furthermore, the warmer tones proposed for the external materials of Block F result in a proposal that is more suitable for the suburban context than the grey tones previously proposed at upper level.

5.1.4 Setting of the Protected Structure

Existing Context

The site has been in use as a single family home for an extended period of time. The structures and landscaping have suffered from a lack of investment and maintenance. Dalguise House has been the subject of a number of interventions such as the construction of a modern garage and a large extension which accommodates a disused swimming pool.

The enclosed *Historic Landscape Assessment of its Lands and Environs* Report and the *Historical Landscape Impact Statement*, prepared by John Olley, enclosed at Appendix 15.1 of the EIAR, provides a detailed assessment of the history of the landscape associated with the site and its environs, including:

“From the analysis of cartographic evidence, the historical development of Monkstown, and the context of the character of early nineteenth landscape design in Ireland, the current setting of Dalguise house represents but a fragment of a larger design; a fragment that has undergone stages of adjustments, at times struggling to reconcile its position with the changing nature of its immediate surroundings.

The significance of the lands of Dalguise as an elegant and accomplished landscape design lay only in its contribution to the original larger site of Carrickbrennan and its relationship to the development of a series of related houses along the south side of Monkstown Road. Without the relationship to the whole its significance is compromised. The original design worked with and responded to the topography of the site. Carrickbrennan House was very precisely positioned and orientated to capture the best views of the bay and mountains. The southern end of the site begins to descend from the high point of the site giving an ideal site to maximise the micro-climatic advantages for the location of a pair of walled gardens.

Dalguise House was attached to the north eastern corner of one of the walled gardens thereby determining its orientation and the views it could command. The views available to the principal rooms lacked the picturesque quality of those from Carrickbrennan. However the intimate connection with the more intense gardened space was compensation as it formed a composed foreground to views south from the house.

With the effective complete separation of Dalguise from the complementary half of the original design in 1881, its lands were redefined with thick boundary planting along the boundary with Carrickbrennan. Also a central axis to the site was established with the stone-sett path leading to the entrance of the house achieving a degree of symmetry.

The succeeding sequence of owners contributed their own preferences and enthusiasms to the planting of the site by the addition of non-native specimen trees and cultivars, such a characteristic of a nineteenth century villa garden and designed landscape. This became a feature of the evolving site of Dalguise contributing to its present character. With more than 130 years of evolution, much of what had been a collection of individual specimen trees displaying their characteristic sculptural shape has become a collision of trees forced into competition. This has come with the inevitable loss of form of individual trees and a fight for survival. Self-seeded newcomers appear to have joined in the conflict. In some areas this is more pronounced particularly on the northern boundary along the stream. The other consequence has been a loss of visual connection with the surrounding landscape as the height and bulk of the planting has increased.”

Alterations Made at Further Information Stage

As detailed in the enclosed *Response to Further Information Report* prepared by Reddy Urbanism and Architecture, alterations have been made to the exteriors of the proposed Blocks that have a direct relationship with Dalguise House, namely Blocks E, F and G, which bound the central formal open space.

The design of Block E which is to the north of Dalguise House has been altered to provide double height glazing at Ground and First Floors, this rebalances the appearance of the southern façade when seen from Dalguise House and the intervening central open space. Increased glazing has been added to the top level and the tonal change made to reduce the 'visual solidity' of the building. Furthermore, the colouring of the balcony and windows has been altered to visually differentiate this block from the adjoining Blocks F and G.

Blocks F and G to the east and west of the central square have been altered to include stone material on the North West and North East corners respectively. These stone sections of the building are located either side of Block E and will be read in that context when seen from Dalguise House to the south, thus creating a more formal setting for the central open space in front of Dalguise House. A stone plinth section has been added at Ground and First Floor Levels, on the elevations either side of the central open space further creating a feeling of formality. The material colours at top level have been altered to be a warmer colour than previously proposed.

Assessment of Proposed Development

Chapter 15 of the EIAR, Architectural Heritage, acknowledges the proposed development will alter the setting of the Protected Structure.

However, mitigation measures informed the design of the proposed development. However, mitigation measure have informed the design of the proposed development:

"Careful location of the apartment blocks so as to retain the spatial centrality of Dalguise House itself and to allow views of the House to visitor as they approach along the historic carriage route, between Blocks D, E & F. The House defines the symmetrical relationship between Blocks F & G and has a direct axial relationship with Block E, the tallest.

The new apartment blocks are located at such a distance from the house that its form can be still clearly seen and understood. The same is true of the relationship to the walled garden, in which Block H is pushed east so as to retain the legibility of the broad sweep of the brick wall on its inside face."

The enclosed *Historic Landscape Assessment of its Lands and Environs Report* and the *Historical Landscape Impact Statement*, prepared by John Olley, enclosed at Appendix 15.1 of the EIAR, states the following in respect of the impact of the proposed development:

"This part of Monkstown with its proximity to the sea and shoreline and the convenience of the railway has not lost its attraction since the 1834. Today the availability of public transport meets the imperative to limit the congestion, pollution and the potential carbon footprint of development. In the current socio-economic conditions, Dalguise has lost the viability to maintain the site for a single-family dwelling. In its present form, it has lost most of its connection with the setting so clearly defined by the statement "beautiful situations for building" written on the 1792 survey of the lands.

The current development proposals for the site and house of Dalguise represent a dramatic transformation. The impact upon the current character of the landscape is substantial. However

this represents the next phase of its history and one that seeks to treasure some of the site's surviving assets whilst responding to economic and social pressures. The proposals are radical for the site's history but there are pressures dictating change, not least its current state of neglect and lack of use. The proposed scheme inherits the underlying anatomy of the site as endowed by its history. Elements of the site's existing assets and their qualities are to be conserved, restored, and harnessed to structure the scheme's layout while becoming a sequence of significant features. They are the approach drive with the lodge on Monkstown Road, the 1882 lodge, the existing house, and the walled garden in addition to the stables, their yard and the coachman's house.

The major part of vehicle traffic would have little impact on the enjoyment of the site. It would enter the site via Purbeck over a new bridge and into an underground car park. The gain is that traffic on the original drive is potentially greatly reduced, allowing the drive to be enjoyed by pedestrians. The straight stretch of the drive from Monkstown Road is to remain leafy.

The drive will remain as the gentle curving rise that takes one to the highest point of the site and to the house. The house is treated with dignity, notwithstanding its modest architectural credentials. It would become the focus of the development as a centre for the community, providing amenity for both the residents of the site as well as visitors.

Taking a lead from the formal gesture of the axial path established c.1880 a regular symmetrical space addresses the house from the north. The space is contained on three sides by apartment blocks that look out on to the house as their central focus. The proposed resulting square, replanted, would become a central public area.

To the south, the house will continue to overlook the walled garden. The house, with its position to the northwest corner of the garden, had always a slightly awkward relationship to the layout and the division between the ornamental and productive areas of the walled garden. An apartment block is to be placed in the walled garden in the eastern half with the result that the house would now have a more direct and formal relationship to the resultant garden and its proposed layout. The proposal for units outside the southern end of the walled garden with their limited height would ensure that views to the south from the house would still enjoy a glimpse of the mountains and wider landscape.

This intensification of use of the site inevitably involves an intensification of the designed landscaping. With some planting dating back two hundred years, maturing and being progressively added to over the centuries has itself dramatically changed the character of the site. The current situation with the condition of individual trees or their longevity compromised by competing neighbours, intervention is required for health and safety and aesthetic reasons.

The tally of trees to be removed because of their perceived condition or because of the conflict with the proposed layout of the scheme is outlined in the arborist's impact statement.¹² However, not contained in this was a further qualification of those of special significance, historically or their contribution to the accumulative collection of exotic species or cultivars. However there appears to be no evidence that the collection of trees and shrubs was in anyway a systematic list or that their position within the grounds represented a structured characterisation of species or country of origin etc. Whereas some are unusual or particularly attractive, the trees and shrubs chosen probably reflect the cumulative personal preferences or whims of those who have lived at Richmond Cottage/Dalguise or who have been in charge of the gardens over nearly two hundred years. However, the overall landscape proposal for the site promises within its extensive program of planting to include exotics that, for whatever reason, would have been removed.

The site of Dalguise is today but a fragment of the notable early nineteenth century designed layout. This fragment itself has undergone significant readjustment in its lifetime. Its setting in

the wider landscape has also radically change in those centuries, robbing it yet more of its significance. As such its heritage value is limited. Like any landscape after nearly two hundred years it has radically changed its character as it matures and evolves, as trees and shrubs grow and decline, as the regimes of management or neglect change and as social and economic conditions dictate. Whilst the proposals for the future are radical, they have responded to the site's surviving assets and giving the house a central role in the development."

In summary, the proposed development facilitates positive changes for the site, the Protected Structure and its setting. Public access to the site and Dalguise House itself is provided for the first time in the site's history.

The proposed development also ensures the active use and maintenance of Dalguise House, along with the other historic structures to be retained and repaired (two gate lodges, Coach House and Stable Yard, Walled Garden). The site and buildings therein are in need of investment to prevent the structures suffering from further deterioration from lack of use and maintenance. The lodges and stable buildings are already noted as being in poor condition, and it is recognised that the site would benefit from active management.

The new buildings have been designed to ensure that views of Dalguise House are available along the avenue and from the central open space to the front of the house, and the walled garden to the rear. Materials were selected to be high quality, appropriate to the quality of the subject site.

The proposed development will ensure the trees that are retained will be actively managed, with appropriate trees to supplement the retained trees. The proposed trees include exotics, suitable for a historic site, as well as edible planting which brings the walled garden into productive use again.

5.1.5 Conclusion

As described above and in the enclosed RAU Report, the external materials proposed to be used for Blocks B, C, E and F have been revised. The tonal change, particularly at upper level results in a design more in keeping with the existing context than the version submitted at Application stage. Adjoining blocks will also not read as one form. The materiality and design of Block E has been amended to ensure that it, as the tallest proposed structure, is of appropriate quality. The proposed development, including proposed heights, strikes a balance between the development of the site and respecting the visual amenity of the area and the setting of the Protected Structure.

6.0 FURTHER INFORMATION ITEM NO. 5 – HOUSE GARDENS

"The private amenity area/ rear garden areas for the proposed 3 no. dwellings have not been quantified. From assessment of the submitted details, it is considered that the proposed rear amenity spaces fail to accord with Section 12.8.3.3 Private Open Space, of the County Development Plan 2022-2028. The Applicant is requested to revise same to accord with the provisions of the County Development Plan."

6.1 Applicant's Response to FI Item No. 5

This response has been prepared in coordination with Reddy Architecture and Urbanism.

There are three houses in a terrace in the northwest part of the site, which are proposed to replace a modern existing single dwelling.

The HQA, dated October 2022, notes that these 3-bed houses are provided with gardens of 97, 56.1 and 56.9 sq m, meaning two of the gardens would have been slightly less than the 60 sq m standard required. This was an error in the HQA. The areas have been remeasured and it can be confirmed that the gardens measure 60 sq m; 60 sq m and 97.3 sq m respectively, which is consistent with the Development Plan requirement to provide 60 sq m private open space, behind the front building line for 3-bed houses (Section 12.8.3.3(i) of the Development Plan).

In each case, the garden area is split across two levels with a sunken courtyard off the ground floor and the remainder of the garden space at First Floor Level, which reflects the adjoining ground levels to the rear. The houses benefit from three car parking spaces in the front, one for each house in addition to a shelter at the western side of the houses for cycle parking and bin storage.

It should be noted that the Statutory Notices incorrectly referred to these as two storey houses, whereas they are actually three storey houses, although due to the change in level from front to back, they read as two storey buildings over a lower ground floor from the rear. The revised description provided corrects this error.

The Arborist's Assessment erroneously used the footprint of the existing house, rather than the three proposed houses, when assessing the impact on trees in this section of the site. (The rest of the Assessment was based on the correct information.) The Arborist has reassessed the FI stage scheme with the correct footprint in this area. The Arborist's Impact Assessment shows and additional 2 no. trees will be removed in this part of the site although the overall impact has not changed.

Section 13 of the *Daylight Sunlight And Shadowing Assessment* Report, prepared by Metec Consulting Engineers and submitted with this Response to Further Information provides an analysis of the Sunlight received by the proposed amenity spaces. In respect of the three rear gardens associated with the North West Houses, these all achieve excellent levels of sunlight and are compliant with the BRE Guidelines.

In summary, the gardens associated with the three North West Houses are compliant with the Development Plan standards.

7.0 FURTHER INFORMATION ITEM NO. 6 – PART V

“In terms of the applicants proposal in order to comply with Part V requirements the applicant is advised that the market rents quoted, while indicative, are considered excessive and any agreement based on these would not be considered the best use of resources available. The housing authority's preferred option, would be for the transfer of land. Therefore, the applicant is requested to submit an alternative Part V proposal for consideration.”

7.1 Applicant's Response to FI Item No. 6

This Response Item has been prepared by Tom Phillips + Associates in conjunction with the Applicant.

If the Planning Authority is minded to grant Planning Permission that Grant would include a Condition requiring the Applicant to enter into an agreement under Section 96 with the Local Authority. The Applicant also acknowledges that Section 96(5) provides for any dispute in relation to the agreement other than a dispute relating to value, to be referred to the Board by either party for determination.

The Applicant does not propose to alter the Part V proposal at this time and will comply fully with the legislation with regard to Part V.

8.0 FURTHER INFORMATION ITEM NO. 7 – OPEN SPACE AND PLAY

“The applicant is requested to submit details of the quantum of open space provided and how the proposal in its current form meets the design standards of play provision. The applicant shall provide a full design rationale of the play and recreation opportunities for children and teenagers, as appropriate to the scale and character of proposed development. These opportunities shall be informed by the National Children's Play Policy 'Ready Steady Play' (2004) and 'Teenspace', National Recreation Policy for Young People (2007), and in accordance with departmental and local standards (DLR CDP 2022-28 Section 12.8.9), as appropriate. The Layout Plan shall detail types of play and play area(s), target age groups, landform (included levels and contours) and boundaries, gates and planting.”

8.1 Applicant's Response to FI Item No. 7

The Response to this Item has been prepared by Cameo and Partners in the enclosed *RFI Response Report*, which details compliance with the above referenced documents.

The quantum of open space is detailed in the Report and illustrated in Cameo Partners Drawing C0135 L9003 Rev 01 (Open Space Quantum And Locations) and C0135 L9005 Rev 01 (Play Space Layout Plan). This demonstrates that the appropriate quantum of open space has been provided. In respect of Communal Open Space, additional communal open space has been provided across the site to compensate for some of the BTR units not having Private Open Space (as is facilitated by SPPR No. 8 of the Apartment Guidelines 2020; and Circular NRUP 07/2022).

The Cameo Partners Report provides a full design rationale for the play provision with regard to the above referenced standards, see Cameo Partners Drawings C0135 L9010 Rev 01; C0135 L9011 Rev 01; and C0135 L9012 Rev 01.

There are three larger play spaces. Two within the Communal Open Spaces (284 and 204 sq m) and one in a Public Open Space within the walled garden (209 sq m), in addition to four smaller play spaces along the walking routes (65 sq m total). Furthermore, there is a 370 sq m woodland walk, climbing and balancing equipment suitable for older children, pre-teens and teens, to the west of the site. Teens will also benefit from the yoga platform and various seating areas.

The play areas will cater to a range of age groups and the design of the spaces builds on the attractive varied landscape of the scheme.

9.0 FURTHER INFORMATION ITEM NO. 8 – OPEN SPACE AND FUNCTIONALITY

“Concerns arise in respect to the usability and functionality of these communal amenity space and public open spaces without radial sunshine. The Applicant is requested to submit a design rationale to the usability and functionality of these spaces having regard to the design modifications requested previously.”

9.1 Applicant’s Response to FI Item No. 8

The Response to this Item has been prepared by Cameo and Partners in the enclosed *RFI Response Report*, which details compliance with the above referenced documents.

The Cameo response includes information derived from the enclosed *Daylight Sunlight and Shadowing Assessment*, July 2023, prepared by Metec Consulting Engineers, which shows that in excess of 2 hours of sunlight can be received by the open spaces on 31st March (play areas, communal open space and public open spaces), as is required by BRE Guidelines. Therefore, the open space is consistent with the relevant guidance in respect of sunlight. The enclosed Report by Cameo describes the functions of each of the open spaces and provides a rationale for same.

In some cases, particularly around the periphery of the site the existing trees to be retained may shade the open spaces, but it is considered that the mature trees will result in open spaces of interest that are different from spaces that can normally be delivered with residential developments. These spaces may also be more attractive in rain, when trees provide some level of cover. The two largest public open spaces in front of Dalguise House and within the walled garden to the rear do not include large trees to be retained and will therefore benefit from any available sunlight.

The open spaces are distributed across the site providing easy access to all residents, they will be attractive functional spaces that are well considered and will provide interest for a wide range of age groups and abilities in different weather conditions.

10.0 FURTHER INFORMATION ITEM NO. 9 – EXTERNAL FINISHES

“The Applicant is requested to clarify that the proposed external finishes of Dalguise House, as conflicting details have been submitted on the application. The Applicant is advised that it preferable to retain the existing external appearance/ unpainted render finish in the interests of protecting the character and appearance of the protected structure.”

10.1 Applicant’s Response to FI Item No. 9

The proposal is to retain the existing external appearance/unpainted render finish of Dalguise House.

RAU drawing MKS-RAU-DH-ZZ-DR-A-203 P01, dated 24 October 2022 states in the notes *“All external materials to match existing finishes”* and *“Existing finished to be retained and restored”*.



Figure 10.1: CGI showing Dalguise House to the left with the existing render retained unpainted, (Source: Modelworks CGI 03, dated May 2023.)

11.0 FURTHER INFORMATION ITEM NO. 10 – RED BRICK LODGE

“The existing chimney stack to the red brick gate lodge shall be retained in order to protect the existing roofscape character and form. The removal of the chimney internally is accepted to the Planning Authority, subject to suitable bracing to ensure its retention as a dummy feature on the roofscape.”

11.1 Applicant’s Response to FI Item No. 10

The response to this Item has been prepared in conjunction with Reddy Architecture and Urbanism and Mullarkey Pedersen Architects.

The chimney stack at the red brick gate lodge is no longer proposed to be removed, the chimney breast as seen at Ground Floor Level will also remain in situ.

RAU’s Drawing No. MKS-RAU-BG-ZZ-DR-A-100 Rev P02, entitled *Brick Gate Lodge* has been adjusted to show this alteration. The description of development has also been updated, the text of Chapter 15, of the EIAR, Architectural Heritage, prepared by Mullarkey Pedersen Architects has also been updated to remove references to the demolition of the chimney.



Figure 11.1: North Elevation of Brick Lodge, both chimneys will be retained. (Source: RAU Dwg *Brick Gate Lodge*, MKS-RAU-ZZ-DR-A-100, Rev P02.)

12.0 FURTHER INFORMATION ITEM NO. 11 – ACCESSIBLE PARKING, SET DOWNS & EV CHARGING

“The Applicant is requested to submit revised drawings and details which demonstrate the provision of accessible parking spaces which are suitable for use by people with disabilities adjacent to Blocks I & J.

The drawings shall also demonstrate appropriate set-down for all residential areas adjacent to building entrances to enable drop off of users with diverse abilities.

The Applicant shall also submit revised drawings and details which clearly demonstrate the provision of electric vehicle charging points in accordance with the requirements outlined in Section 12.4.11 Electrically Operated Vehicles of the current DLRCC County Development Plan 2022-2028. A minimum of one car parking space per five car parking spaces shall be shown to be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.”

12.1 Applicant’s Response to FI Item No. 11

In response to this Item, two accessible car parking spaces have been provided beside Blocks I and J. Please refer to RAU Drawing MKS-RAU-ZZ-00-DR-AR-100 Rev P02 - GA-Site-Proposed Garden Level, and the RAU *Response To Request For Further Information - Design Statement* for further details.

Five set down places are now being provided across the site. Each set down measures 2m x 8m they are located at: the Main Avenue in front of Block D, between Blocks E and F (these can also serve Blocks A-C), to the east of Block F and at the rear of the site at Block H, and between Blocks I. The set down spaces will cater for accessible users and also for deliveries/ work vehicles. (Please see RAU *Response To Request For Further Information - Design Statement* and RAU Drawing - MKS-RAU-ZZ-00-DR-AR-100 Rev P02 and Cameo Partners Landscaping Drawing C0135 L103 Rev 01) for set down areas.

Electric Vehicles

Metec Consulting Engineers prepared the response to this issue, please refer to the Metec Consulting Engineers *Sustainability Report/Energy Statement* Rev 02 and the following drawings:

- Electrical Services Installation - Ground Level EV Charging Layout - Sheet 1 of 2 MKS-MET-ZZ-ZZ-DR-E-6902A Rev 02
- Electrical Services Installation - Ground Level EV Charging Layout - Sheet 2 of 2 MKS-MET-ZZ-ZZ-DR-E-6902B Rev 02
- Basement Level Charging Layout MKS-MET-ZZ-1-DR-E-6901 Rev P03

One in every five car parking spaces is provided with a functional EV Charging Point and ducting is provided for all car parking spaces.

13.0 FURTHER INFORMATION ITEM NO. 12 – ROAD DRAWINGS

“The Applicant shall submit revised drawings and details which demonstrate the required provision of proposed set-down (deliveries/work vehicles and move in/out vehicles) and car sharing car parking space locations. The drawings shall clearly demonstrate required road markings which allocate each type of space where applicable.”

13.1 Applicant’s Response to FI Item No. 12

Please refer to the Reddy Architecture and Urbanism *Response To Request For Further Information - Design Statement* which identifies the proposed set-down spaces. Five set down/delivery spaces are now being provided across the site. Each space measures 2m x 8m they are located at: the Main Avenue in front of Block D, between Blocks E and F, to the east of Block F and at the rear of the site at Block H, and between Blocks I. The set down spaces will cater for accessible users and also for deliveries/ work vehicles. (Please see RAU Drawing - MKS-RAU-ZZ-00-DR-AR-100 Rev P02 and Landscaping Drawing C0135 L103 Rev 01) for set down areas).

Some 6 no. car sharing car parking space locations are to the south of Block G, close to the centre of the site.

Please refer to ROD Drawings provide dimensions, road markings and allocation of parking spaces *Road Markings and Signage* – Sheet 01 of 03 to Sheet 03 of 03 (Dwg No. DSH ROD GEN SW_AE DR CH 300003 Rev 01; Dwg No. DSH ROD GEN SW_AE DR CH 300004 Rev 01; and Dwg No. DSH ROD GEN SW_AE DR CH 300005 Rev 01).

14.0 FURTHER INFORMATION ITEM NO. 13 – CYCLE PARKING

“The Applicant shall submit revised drawings and details which address the following items in relation to cycle parking provision at the proposed development:

- a. *Provision of an increased number of ‘Sheffield’ cycle parking stands in accordance with DLRC’s ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments’.*
- b. *Proposed provision and details of site-wide cycle parking, (quantity, cover, type and location) to be clearly demonstrated and detailed on standalone layout drawing.*
- c. *Proposed access routes to all cycle parking for both pedestrians and cyclists to be clearly demonstrated on submitted drawings.*
- d. *Preparation and inclusion of a Cycle Audit which demonstrates, in plan format, how all the requirements of the Council’s Standards for Cycling Facilities for New Developments are met within the proposed development.*
- e. *Provision of quantity and type of cycle parking for Block B & C to be clearly demonstrated.*
- f. *Block D cycle parking appears to serve Block E, F and G also which requires some users to access from a potential distance of approximately 130m. The proposed layout relies solely on stacked cycle parking and does not adequately cater for various users and is not in accordance with DLRC Standards. The proposed access appears to be approximately 500mm in width, and the access to the cycle parking appears to be unpaved.*
- g. *Location of Cargo Bike parking in basement requires too much interaction with vehicles in parking area and onerous route to surface.*
- h. *Block H internal cycle parking relies solely on stacked cycle parking and access to surface appears to be via lift only, which is not in accordance with the required DLRC Standard.*
- i. *No cycle parking is proposed within Blocks I.*
- j. *Block J internal cycle parking relies solely on stacked parking.*
- k. *Demonstration of high-quality provision of e-bike charging and cargo bike parking across the site.*
- l. *Demonstration of covered cycle parking for the non-residential cycle parking.*

NOTE : Cycle parking quantity and design shall be in accordance with the DLR ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments.’

14.1 Applicant’s Response to FI Item No. 13

This Section of the Response has been prepared in coordination with Cameo Partners Landscape Architects, Roughan O’Donovan Consulting Engineers and Reddy Architecture and Urbanism.

Applicant’s Response to FI Item No. 13(a)

“Provision of an increased number of ‘Sheffield’ cycle parking stands in accordance with DLRC’s ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments’.”

Please refer to the RFI Response Report prepared by Cameo Partners and Cameo Partners Dwg C0135-L9000 Rev. 01, *Bicycle Parking and Layout*, the latter includes a schedule of cycle parking.

In summary, there are two standards that apply to the provision of cycle parking across the site. The Apartment Guidelines, 2022, which require a greater number of cycle parking spaces, and DLRC’s ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments’.

The number of cycle parking spaces provided exceeds the number required by DLRC’s Cycle standards, and also the standards of the Apartment Guidelines. Some 711 No. long stay spaces and 256 No. short stay spaces are provided, a total of 967 No. plus an addition 20 No. cargo bike space.

All short term cycle spaces are provided as ‘Sheffield’ cycle parking to DLRC’s standard. Long term parking in basement, undercroft or internal to buildings is provided as single level stacker stands. Long term parking in above ground secure cycle shelters is provided with a mix of ‘Sheffield’ cycle parking to DLRC’s standard and single level stacker stands. Short and Long term cycle parking has been provided in proximity to building entrances.

By providing Long term cycle parking in the form of single level stacker stands (which are closer together than Sheffield stands) the amount of space required to accommodate cycle parking is reduced, which reduces the visual impact on the landscape and the amount of floor area required within buildings.

It is considered that an appropriate range of cycle parking space types are provided across the site, and critically the short term spaces are Sheffield stands.

Illustrations of single level stackers are provided below.



Figure 14.1: example of single level cycle stacking.



Figure 14.2: example of single level cycle stacking.

Applicant's Response to FI Item No. 13(b)

"Proposed provision and details of site-wide cycle parking, (quantity, cover, type and location) to be clearly demonstrated and detailed on standalone layout drawing."

Please review Cameo's RFI Response Report, and Cameo drawing C0135 L9000 Rev 01 - *Bicycle Parking Quantum and Layout*, which shows the location at surface level and basement level of cycle parking spaces and the different type of cycle stands. The Cameo RFI Response Report also shows the design of cycle shelters, which will be wooden structures with green roofs. The location of cycle stands and shelters are also shown on the relevant enclosed Site Plans prepared by RAU.

Applicant's Response to FI Item No. 13(c)

"Proposed access routes to all cycle parking for both pedestrians and cyclists to be clearly demonstrated on submitted drawings."

Please refer to the following Cameo Partner drawings which show the cycle and pedestrian routes to the cycle stands at grade and basement levels:

- C0135 L9000 Rev 01 *Bicycle Parking Quantum and Layout* (including distances to cycle stands),
- C0135 L9001 Rev 01 *Pedestrian Access Strategy*.
- C0135 L9002 Rev 01 *Bicycle Access Strategy*, and
- C0135 L103 Rev 01 *Landscape General Arrangement Plan*.

Applicant's Response to FI Item No. 13(d)

"Preparation and inclusion of a Cycle Audit which demonstrates, in plan format, how all the requirements of the Council's Standards for Cycling Facilities for New Developments are met within the proposed development."

The enclosed Quality Audit prepared by PMCE includes a Cycle Quality Audit. Furthermore, please refer to Cameo Partners Dwg C0135 L9000 Rev 01 *Bicycle Parking Quantum and Layout* which identifies cycle stand numbers and locations, including distances to cycle stands.

The appropriate number of cycle stands are provided across the site. All short stay spaces are Sheffield Stands, however, in order to reduce floor area required the long stay cycle parking spaces are single stackers. Of the 598 No. cycle parking spaces required by the DLR Standards, 589 No. (or 98.5%) are within the 25m/50m distances for short/long term cycle parking, as required by the DLR Cycle Standards.

Applicant's Response to FI Item No. 13(e)

"Provision of quantity and type of cycle parking for Block B & C to be clearly demonstrated."

Please refer to the Cameo Partners RFI Response Report and Drawing C0135 L9000 Rev 01 titled *Bicycle Parking Quantum and Layout*, which identifies the location, type and quantum of cycle spaces for each block and provides a cycle parking schedule. The cycle schedule shows that the correct number of long term and short term cycle spaces are provided for each Block.

Bicycle parking for Blocks B and C are in a number of locations at the Purbeck entrance, including under the external stairs near Block A and in the undercroft of Blocks B + C, and external to the building to the north of Blocks B and C. These cycle spaces include secure spaces, covered and uncovered spaces as detailed in Cameo Partners Dwg C0135 L9000 Rev 01. (See also RAU Drawing MKS-RAU-ZZ--2-DR-AR-050 Rev P02, *GA-Site-Proposed Purbeck Level*.)

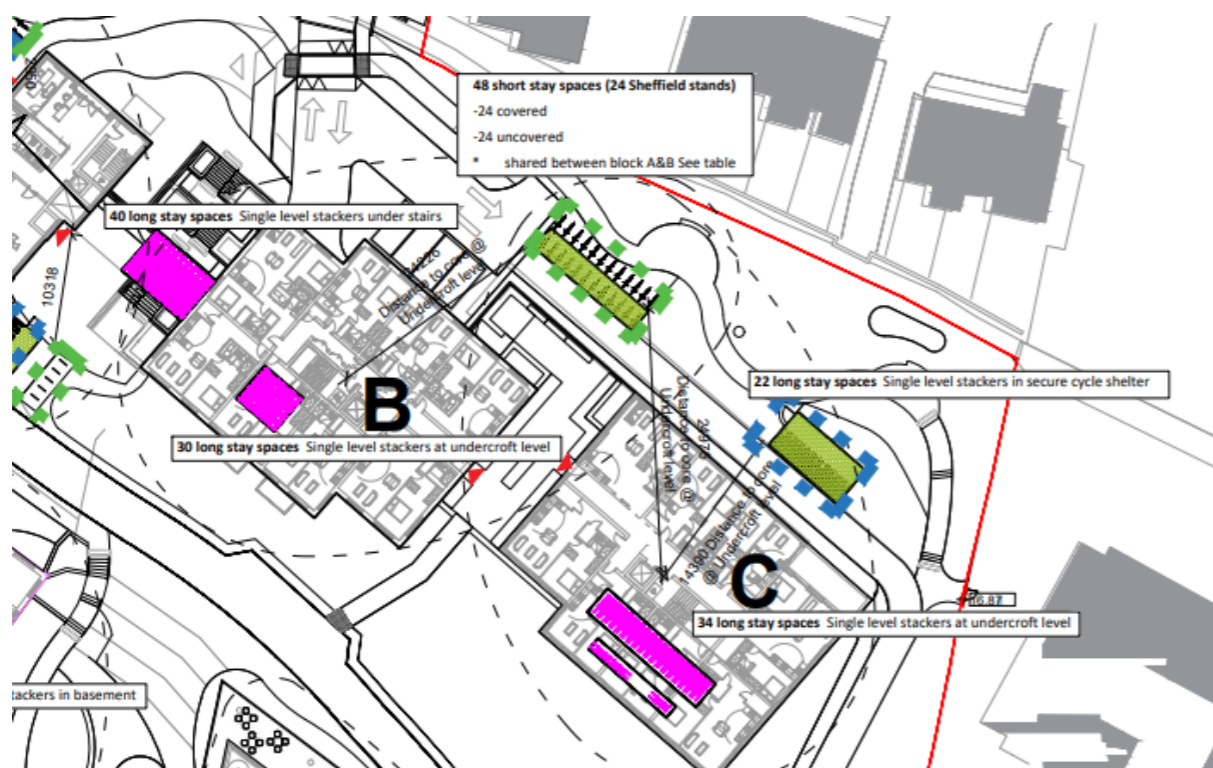


Figure 14.3: Extract of Drawing C0135 L9000 Rev 01 focused on Blocks B and C. (Source: Cameo Partners Drawing *Bicycle Parking Quantum and Layout*.)

Table 14.1: Cycle Parking at Blocks B and C				
	DLR Cycle Requirements Long term	Long term cycle parking provided in or adjoining building	DLR Cycle Requirements Short Term	Short term cycle parking provided in or adjoining building
Block B	48	23 single level stacker spaces in undercroft of Block B 40 single level stacker spaces under central access stairs Total 63 No. long term spaces.	10	24 Sheffield spaces to the north of Block B, 12 of which are sheltered.
Block C	48	34 single level stacker spaces in undercroft of Block C 7 single level stacker spaces in undercroft of Block B 22 single level stacker spaces in surface level secure shelter to north of Block C. Total 63 No. long term spaces.	10	24 Sheffield spaces to the north of Block B, 12 of which are sheltered.

Applicant’s Response to FI Item No. 13(f)

“Block D cycle parking appears to serve Block E, F and G also which requires some users to access from a potential distance of approximately 130m. The proposed layout relies solely on stacked cycle parking and does not adequately cater for various users and is not in accordance with DLRC Standards. The proposed access appears to be approximately 500mm in width, and the access to the cycle parking appears to be unpaved.”

The access to the cycle parking within the basement car park has been relocated. The cycle entrance is now located at the northern façade of Block D, bikes will enter via the main avenue (and not via the vehicular access to the basement). Therefore, cyclists do not share the vehicular ramp to the basement. The access to the cycle store in Block D is 1200mm wide and the access will have a resin coated concrete finish. (See RAU Drawing MKS-RAU-ZZ- -1-DR-AR-051 Rev P02, *GA-Site-Proposed Lower Level*.)

Block D still contains a significant amount of bicycle spaces (120 No. long stay spaces, of these 80 No. serve Block D, 14 No. Block E, and 26 No. Block G). However, additional bicycle spaces have been distributed around the basement next to the cores of Block E (78 No.), F (46 No.) and G (44 No.)

Cyclists enter the basement directly from the Main Avenue at grade in the Lower Level of Block D. The Entrance door is fobbed and secure and 1500mm clear width to allow for ease of entry. From this point the cyclist has direct entry into Block D. From Block D the cyclist can store their Bike in the extensive single stacked store space with direct access to Block D. To access the other cycle stores in the basement there is a direct route from this point with a sloped gradient of 1:21 separated from cars leading to the 3 further storage areas with easy access to cores of Blocks, E,F and G. Block G is also provided with long term cycle parking at surface level to the north of the building.

In each case, the quantum of long term cycle parking spaces required under the DLR Standards are provided by the core of Block D, E, F and G or at grade and in proximity to the relevant building entrance.

Table 14.2: Cycle Parking at Blocks D - G				
	DLR Cycle Requirements Long term	Long term cycle parking provided in or adjoining building	DLR Cycle Requirements Short Term	Short term cycle parking provided in or adjoining building
Block D	52	80 single level stackers in Block D basement (at the building entrance).	10	26 Sheffield spaces at entrance and to the south of the Block.
Block E	66	78 single level stackers in Block E basement, 14 single level stackers in Block D basement Total 92 No. long term spaces.	14	14 Sheffield spaces, 20 Sheffield spaces to the east of Block E at grade. Total 34 No. short term spaces.
Block F	76	46 single level stackers in Block F basement core, 40 surface level secure shelters (10 Sheffield to north, 30 single level stackers to south of building)	15	4 Sheffield spaces at entrance 4 Sheffield spaces to the north of the Block 30 Sheffield spaces to the west of the Block

		12 single level stackers in surface level secure shelter at coach house 8 single level stackers in surface level secure shelter at Block I1 and I2. Total 108 No. long term spaces.		Total 38 No. short term spaces. Plus 1 cargo spaces
Block G	76	44 single level stacker spaces in Block G basement core 30 single level stacker spaces surface level secure shelter to north 26 single level stacker spaces in basement by Block D 8 single level stacker spaces in secure shelter at Block 1s Total 108 No. long term spaces.	15	4 Sheffield spaces at Block entrance; 14 Sheffield spaces to southeast; 20 Sheffield spaces to north of building Total 38 No. short term spaces.

Please refer to the Cameo Partners RFI Response Report Drawings C0135 L9000 Rev 01 titled *Bicycle Parking Quantum and Layout* and C0135 L9002 Rev 01 titled *Cycle Access Strategy* and RAU Dwg MKS-RAU-ZZ--1-DR-AR-051 Rev P02, *GA-Site-Proposed Lower Level*.

Applicant's Response to FI Item No. 13(g)

"Location of Cargo Bike parking in basement requires too much interaction with vehicles in parking area and onerous route to surface."

There are 20 No. Cargo Bike spaces provided. Some 16 No. at Basement Level (close to the cores of Block D (10 No.), Block E (3 No.), Block F (1 No.), and Block G (2 No.)). The 4 cargo bike spaces at grade are located between Block J and the Coach House (2 No.), between Blocks E and F (1 No.) and between H and I2 (1 No.).

The cycle access to the Basement Car Park has been revised. A separate entrance is provided off the main avenue at the northern façade of Block D, which will allow for a separate access for bicycles including Cargo Bikes. The separate entrance is designed with a gentle sloped gradient of 1:21 and is 1500mm clear, fully separated from cars from the entrance of Block D to the cycle store of Block G. The remainder of the basement contains footpaths to the other cycle stores and cyclists will dismount to access the stores for Block E and F.

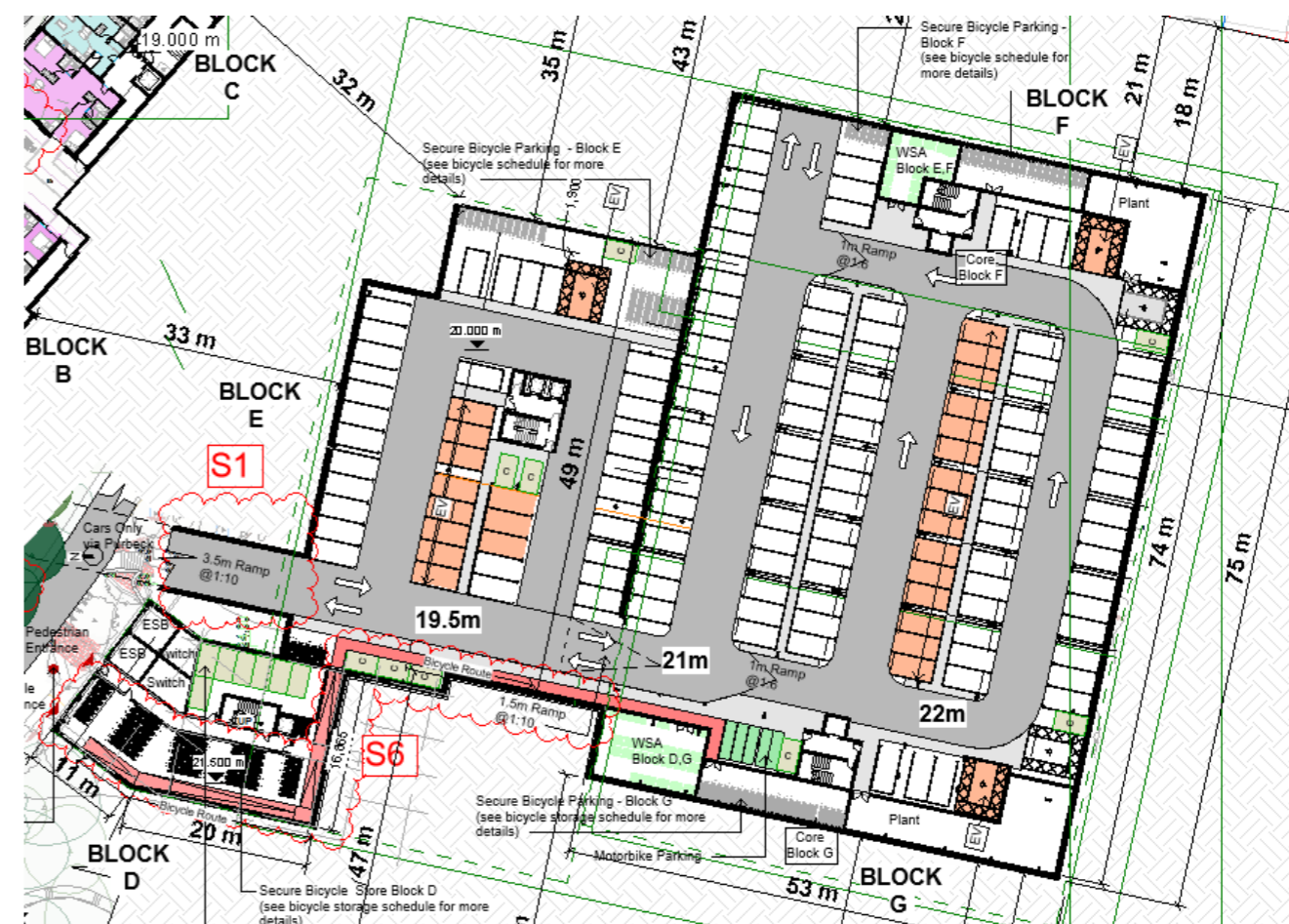


Figure 14.4: RAU Drawing showing cycle entrance to Block D with the cycle route in pink, the 16 no. cargo bike spaces are identified in green. (Source: RAU Drawing *GA-Site-Proposed Lower Level* MKS-RAU-ZZ- -1-DR-AR-051 Rev P02.)

Please also refer to Cameo Partners drawings:

- C0135 L9000 Rev 01 *Bicycle Parking Quantum and Layout* and
- C0135 L9002 Rev 01 *Cycle Access Strategy*.

Applicant's Response to FI Item No. 13(h)

"Block H internal cycle parking relies solely on stacked cycle parking and access to surface appears to be via lift only, which is not in accordance with the required DLRCC Standard."

Please refer to the Cameo Partners RFI Response Report and Drawing C0135 L9000 Rev 01 *Bicycle Parking Quantum and Layout*, which identifies the location, type and quantum of cycle spaces for each block and provides a cycle parking schedule. No lift access is required to access the internal cycle parking, it is at 'Lower Level' which, due to level changes across the site, can be accessed from grade from the east side of Block H. All short term cycle parking are Sheffield stands, long term cycle parking is a combination of Sheffield stands and single level stackers, and is considered to provide sufficient options for residents.

Table 14.3: Cycle Parking at Block H				
	DLR Cycle Requirements Long term	Long term cycle parking provided in or adjoining building	DLR Cycle Requirements Short Term	Short term cycle parking provided in or adjoining building
Block H	54	62 single level stacker spaces internally adjacent to entrance of Block H 18 Sheffield spaces in surface level secure shelter to north. Total 80 No. long term spaces.	11	28 Sheffield spaces: 6 covered to the east; 5 covered to the south; 17 uncovered to the south). Total 28 No. short term spaces. A cargo bike stand is also located to the south.

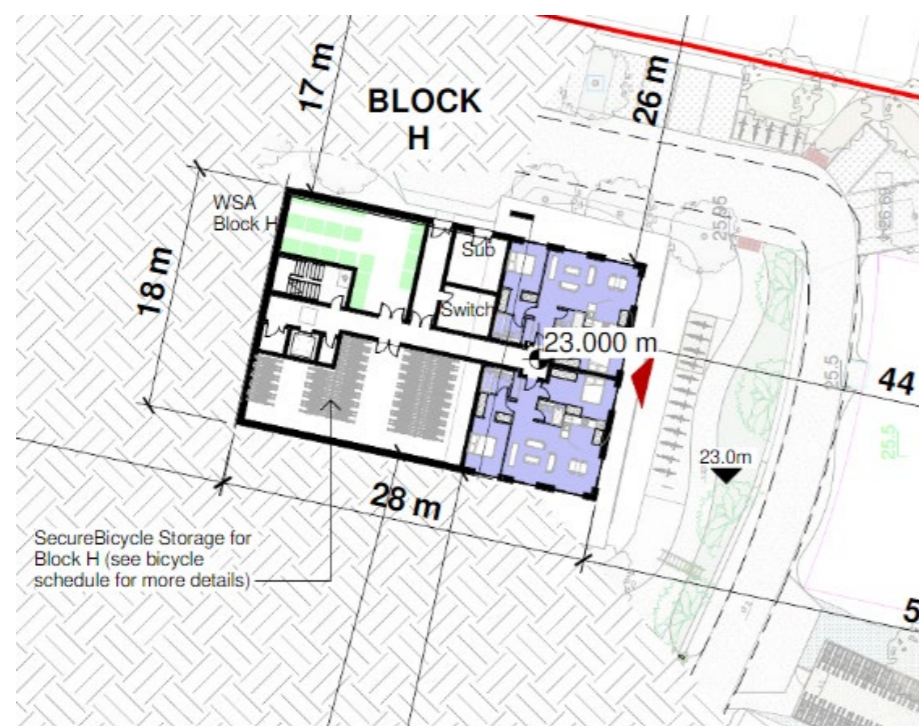


Figure 14.5: RAU Drawing showing cycle entrance to Block H at grade. (Source: RAU Drawing GA-Site-Proposed Lower Level MKS-RAU-ZZ- -1-DR-AR-051 Rev P02.)

Applicant's Response to FI Item No. 13(i)

"No cycle parking is proposed within Blocks I."

Please refer to the Cameo Partners RFI Response Report and Drawing C0135 L9000 Rev 01 titled *Bicycle Parking Quantum and Layout*, which identifies the location, type and quantum of cycle spaces for each block and provides a cycle parking schedule.

Table 14.4: Cycle Parking at Block I1 and I2				
	DLR Cycle Requirements Long term	Long term cycle parking provided in or adjoining building	DLR Cycle Requirements Short Term	Short term cycle parking provided in or adjoining building
Block I1	12	22 single level stacker spaces located within a secure shelter between the two I Blocks.	2.5	6 Sheffield short term spaces are provided to the to the south of block H, 3 covered and 3 uncovered.
Block I2	12	22 single level stacker spaces located within a secure shelter between the two I Blocks.	2.5	6 Sheffield short terms spaces are provided to the east of Block I2, all of which are covered.

Applicant's Response to FI Item No. 13(j)

"Block J internal cycle parking relies solely on stacked parking."

Please refer to the Cameo Partners RFI Response Report and Drawing C0135 L9000 Rev 01 titled *Bicycle Parking Quantum and Layout*, which identifies the location, type and quantum of cycle spaces for each block and provides a cycle parking schedule.

As detailed in the Table below, the appropriate number of cycle parking spaces are provided to meet DLR's cycle standards. Long term spaces are a combination of Single level stacker parking and Sheffield stands. Short term spaces are all Sheffield stands. While only 10 no. long term cycle parking spaces are Sheffield stands, it is considered sufficient choice is provided for Block J, and the spaces within the cycle store inside the building will be attractive to residents, and that sufficient options are provided.

Table 14.5: Cycle Parking at Block J				
	DLR Cycle Requirements Long term	Long term cycle parking provided in or adjoining building	DLR Cycle Requirements Short Term	Short term cycle parking provided in or adjoining building
Block J	20	24 single level stacker spaces located within the building by the eastern entrance. 10 Sheffield spaces in surface level secure shelter to the west of the building. 2 cargo bike stands are provided beside the shelter. Total 34 No. long term spaces.	4	10 Sheffield short term spaces are provided to the south of Block J.

Applicant’s Response to FI Item No. 13(k)

“Demonstration of high-quality provision of e-bike charging and cargo bike parking across the site.”

There are 20 No. Cargo Bike spaces provided. Some 16 No. at Basement Level (close to the cores of Block D (10 No.), Block E (3 No.), Block F (1 No), and Block G (2 No.). The 4 cargo bike spaces at grade are located between Block J and the Coach House (2 No.), between Blocks E and F (1 No.) and between H and I2 (1 No.). The provision of cargo bike parking is distributed across the site allowing for access for different residents. As a BTR development with a strong central management regime the developers would be able to increase provision of cargo bike parking, subject to relevant planning considerations, should further demand from residents arise. All indoor/undercroft Cargo bike spaces will be provided with charging facilities.

In relation to other ebike facilities, some charging points will be provided in the main bike store in Block D, and in the undercroft of Blocks B and C and basements of Blocks E, F, G, J and H. Ebike batteries will generally be removed from the bike and charged within the owners dwelling.

Applicant’s Response to FI Item No. 13(l)

“Demonstration of covered cycle parking for the non-residential cycle parking.”

Please refer to the Cameo Partners RFI Response Report and Drawing C0135 L9000 Rev 01 titled *Bicycle Parking Quantum and Layout*, which identifies the location, type and quantum of cycle spaces for each block and provides a cycle parking schedule. In the case of the childcare and café/restaurant uses, in both cases 2 No. long stay covered cycle spaces are provided.

Applicant’s Response to FI Item No. 13 Note

“NOTE : Cycle parking quantity and design shall be in accordance with the DLR ‘Standards for Cycle Parking and associated Cycling Facilities for New Developments.’”

The proposed scheme is compliant in terms of the quantum of cycle parking provided, by both the *Apartment Guidelines 2022* and *DLRCC’s Standards for Cycle Parking and associated Cycle Facilities for New Developments*.

Table 14.6: Total Cycle Parking Required and Provided			
	DLR Requirement	Apt. Guidelines	Provided
	490 Long Stay	703 Long Stay	716 Long Stay
	108 Short Stay	251 Short Stay	255 Short Stay
Total Spaces Required/Provided:	598	954	971

The Apartment Guidelines provides no specific preference to cycle parking type, however, the DLR guidelines state that the preferred type of cycle parking stand is the ‘Sheffield’ cycle stand.

- Relative to the DLR requirements, an additional 226 No. long stay spaces (+ 46% over requirement) and 147 No. Short Stay spaces (+ 137% over requirement) are provided.
- All 255 No. short stay cycle parking spaces are Sheffield stands (147 No. more than required to meet the DLR standards or 236% of the DLR Standard requirement). It is considered more important to provide Sheffield stands for short stay cycle parking, than for long term cycle parking due to frequency of use/length of stays.
- 60 No. long stay cycle parking spaces are Sheffield stands (or 12% of those required under the DLR standards). Whilst the DLR Standards identify a preference for Sheffield stands, the area of space required for the 490 No. long stay spaces would have significant impacts on the amount of built space required at basement which in turn would further impact on the retention of trees (as detailed in the CEMP, the construction of the basement has been designed to avoid certain trees) and the built structures in the landscape. Single stackers are proposed for the majority of long term spaces, on the basis that residents will be familiar with their cycle parking spaces and will find these spaces easy to manage.
- The DLR standards require short stay cycle spaces to be located within 25m of the building entrance and long stay cycle parking to be within 50m of a building entrance. Of the 598 No. cycle parking spaces required by the DLR Standards, 589 No. (or 98.5%) are within the 25m/50m distances for short/long term cycle parking. In respect of Block C, 7 No. of the 48 No. long stay spaces required are more than 50m from the building entrance. In respect of Block G, 2 No. of the 76 No. long stay spaces required are over 50m from the building entrance.

In summary, the scheme includes high quality cycle parking provision. Residents and visitors are well catered to and will benefit from a range of cycle parking options.

15.0 FURTHER INFORMATION ITEM NO. 14 – QUALITY AUDIT

“The Applicant is requested to submit a revised drawings which demonstrates that all items raised within the submitted Quality Audit by PMCE, dated 04th October 2022 have been adequately addressed. Further to this, the items below shall also be addressed by way of Quality Audit and revised drawings where applicable:

- a. *Works are required to existing vehicular access. The proposed long straight section does not have adequate self-regulating measures. A 2metre footpath should be provided along the entire vehicular entrance and appropriate lighting should be included.*
- b. *Pedestrian access from Purbeck is substandard. Crossing points to provide access to desire lines and nearby destinations within the site should be provided and demonstrated. Tactile paving should be provided to facilitate use by visually impaired and people with diverse abilities.*
- c. *The provision of Bark Chips on pedestrian routes is not suitable and will exclude users of various abilities. Proposed 1.2m access routes should be increased to a minimum of 2m.*
- d. *Excessive provision of steps on pedestrian routes across the site is not in accordance with the principles of universal design or part M of the Building Regulations and will exclude users with diverse abilities. It is not acceptable to segregate users.*
- e. *Pedestrian Access to Block B & C requires the use of stepped pathways, or an alternative, more onerous route from the existing vehicular avenue or along the proposed grass-crete emergency access route which is not suitable for all users.*
- f. *Proposed cycle parking partially obstructs the pedestrian access to Block F & G.*
- g. *Pedestrian access to Block J includes stepped access. The alternative inclined boardwalk access from the rear of the site is noted, however, an alternative access adjacent to the main entrance should be provided.*
- h. *Required measures to ensure pedestrian priority and aid visually impaired users where pedestrian accesses cross proposed carriageway.*
- i. *The provision of steps to rear pedestrian recreational route will exclude users and is not in accordance with the principles of Universal Design.*
- j. *Set-down should be provided adjacent to all blocks in order to allow accessible drop off. Set down should be at or adjacent to, on accessible entrance, in accordance with Part M of the building regulations.*
- k. *The proposed shared road allows excessive visibility and does not include adequate self-regulating measures to function as a shared surface.*
- l. *Access to surface level cycle parking to the south of Block D is via adjacent steps, loose bark chips with steps, or alternative longer and more onerous route via the Dalguise house building.*
- m. *Set down area at Block E does not provide direct pedestrian access to Block E.*
- n. *Provision for impaired users on shared surface carriageway, including tactile paving, in accordance with Section 4.3.4 Pedestrianised and Shared Surfaces of DMURS.*
- o. *Proposed Rill water features, drop offs and Stramps may present a danger to young and visually impaired users of various abilities.”*

15.1 Applicant’s Response to FI Item No. 14

Applicant’s Response to FI Item No. 14(a)

“Works are required to existing vehicular access. The proposed long straight section does not have adequate self-regulating measures. A 2metre footpath should be provided along the entire vehicular entrance and appropriate lighting should be included.”

Reddy Architecture and Urbanism Site Plans include passing bays at each end of the straight section of the existing vehicular entrance to the site, between the existing gate at Monkstown Road and the location of the proposed NW houses.

This section of the existing road is enclosed by trees, and its historic character is substantially maintained (save for the necessary passing bay inside the gate). This will provide very effective traffic calming, underpinning its suitability as a shared space. The introduction of any sections of footpath would compromise the understanding and effectiveness of the shared space. In the event of emergency vehicles requiring rapid access, there are opportunities for pedestrians to step back between the trees to allow them to pass. It is considered that the provision of a footpath would be counter-productive and would undermine the understanding of the shared space. The existing avenue operates satisfactorily as a shared environment, and this will continue to be the case with increased usage. This approach also maximises the retention of the existing vegetation, and therefore minimises the impacts on flora and fauna.

Lighting is proposed along the existing vehicular entrance, see Metec Consulting Engineers Drawing MKS-MET-ZZ-ZZ-DR-E-6001A Rev P04 (Site Lighting Layout Sheet 1 of 2).

Applicant’s Response to FI Item No. 14(b)

“Pedestrian access from Purbeck is substandard. Crossing points to provide access to desire lines and nearby destinations within the site should be provided and demonstrated. Tactile paving should be provided to facilitate use by visually impaired and people with diverse abilities.”

Cameo Partners Drawing C0135 L103 Rev 01 *Combined GF GA* shows the entrance at Purbeck includes A raised Zebra crossing, stop signs and tactile paving.

Crossing points across the site relate to desire lines, and tactile paving is provided as required (see Cameo Partners C0135 L103 Rev 01 *Combined GF GA*).

Tactile paving is not provided at the junction with Monkstown Road, Roughan O’Donovan Consulting Engineers consider that it is right and proper that pedestrians on the Monkstown Road footpath should continue to enjoy priority over cars using the site access, as is currently the case.

Applicant’s Response to FI Item No. 14(c)

“The provision of Bark Chips on pedestrian routes is not suitable and will exclude users of various abilities. Proposed 1.2m access routes should be increased to a minimum of 2m.”

Please refer to Cameo Partners drawings C0135 L103 Rev 01 titled *Landscape General Arrangement Ground Floor - Combined Plan*, and C0135 L9001 Rev 01 titled *Pedestrian Access Strategy* for further details.

All Block entrances, cycle parking spaces and amenity spaces are accessible by Part M compliant 2m wide routes, the majority of paths are made from resin bound gravel.

The only remaining locations where bark mulch is used are the woodland walk to the northwest of the site (which is not counted towards public open space nor communal open space), the most eastern and western parts of the pedestrian route along the northern boundary and a small section to the southeast of the site. Each of these routes is a secondary route in the scheme that include steps due to the level changes which cannot be altered due to tree root protection zones and existing site levels. None of these are primary routes between two points of interest.

Applicant’s Response to FI Item No. 14(d)

“Excessive provision of steps on pedestrian routes across the site is not in accordance with the principles of universal design or part M of the Building Regulations and will exclude users with diverse abilities. It is not acceptable to segregate users.”

Levels vary across the site and it is not possible to design out steps in every case, due to the need to avoid changing levels where existing trees are to be retained.

Where possible designs have been made without steps. All amenity spaces are accessible by Part M compliant 2m wide resin bound routes, additional stepped paths surfaced with bark mulch are provided where levels cannot be changed due to root protection zones.

Please refer to Cameo Partners drawing C0135 L9001 Rev 01 titled *Pedestrian Access Strategy*, which shows that all building entrances and communal and public spaces have a fully accessible route.

Applicant’s Response to FI Item No. 14(e)

“Pedestrian Access to Block B & C requires the use of stepped pathways, or an alternative, more onerous route from the existing vehicular avenue or along the proposed grasscrete emergency access route which is not suitable for all users.”

Pedestrian access to Blocks B and C is available via the undercroft directly to each core where pedestrians access the site from the Purbeck entrance. An elevator is provided on the east elevation of Block A, which is accessible from the outside of the building. This links the Purbeck level to the main avenue above, as an alternative to the central stairs. Pedestrians are therefore not required to use the existing avenue/shared surface, and it is not anticipated that pedestrians would use the grasscrete emergency access route.

This elevator was present in the previous design, but the revised layout provides a more intuitive, usable and welcoming space.

The vehicular access to the basement car park has been realigned so that cars are now directed to the east under Block B and through to the basement car park. This provides a more generous link between these levels for pedestrians.

See Cameo Partners RFI Response Report (page 26) for the revised plan and the enclosed Cameo Partners drawings:

- C0135 L9001 Rev 01 titled *Pedestrian Access Strategy*, and
- C0135 L103 Rev 01 titled *Landscape General Arrangement Ground Floor - Combined Plan*.

Applicant’s Response to FI Item No. 14(f)

“Proposed cycle parking partially obstructs the pedestrian access to Block F & G.”

A 1.8 sq m clear space is provided in front of the building entrances in compliance with Part M and proposed cycle parking is to one side of the access in both locations. This change is illustrated in Cameo Partners *RFI Response Report*.

Applicant’s Response to FI Item No. 14(g)

“Pedestrian access to Block J includes stepped access. The alternative inclined boardwalk access from the rear of the site is noted, however, an alternative access adjacent to the main entrance should be provided.”

An additional ground floor building entrance has been provided for Block J at the southern end of the Block. This access, via the boardwalk is the primary entrance, as it is approached at a gentle slope. The unit mix in Block J has altered with a 3-bed unit replaced by a 2-bed unit in order to accommodate the new entrance.

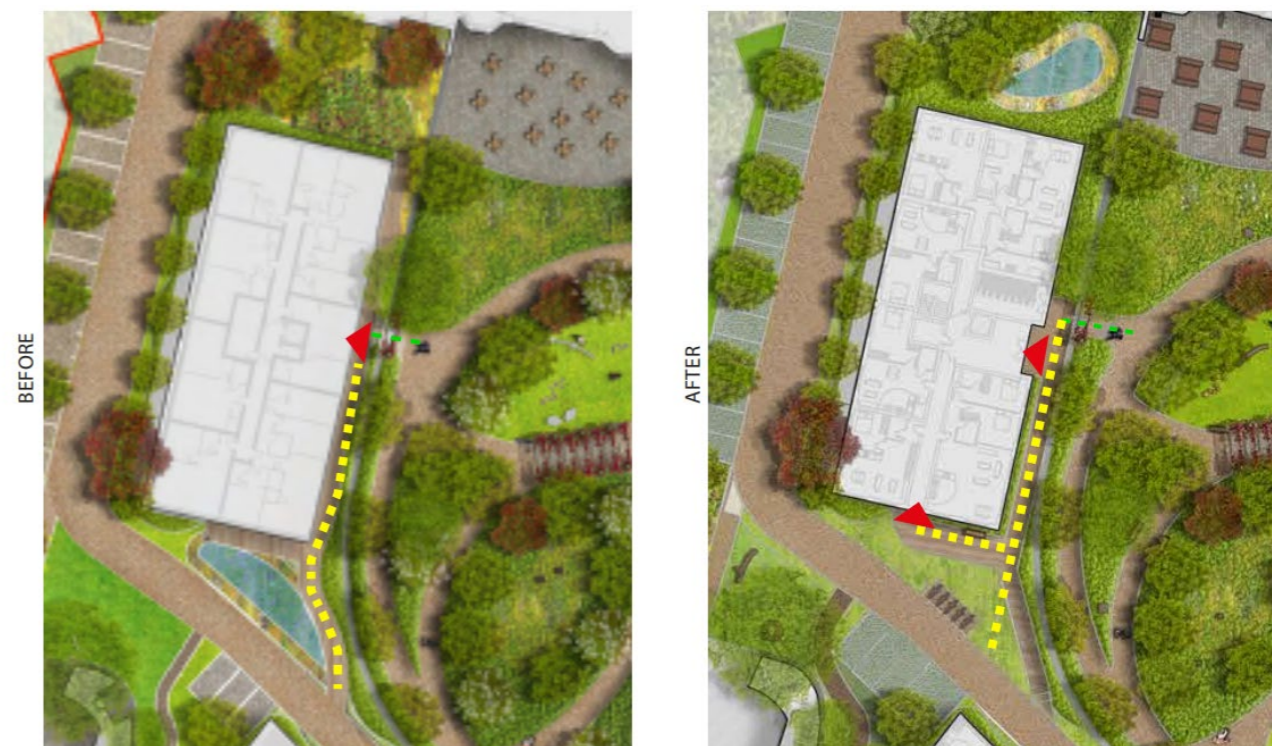


Figure 15.1: Block J access at Planning Application Stage vs Further Information Stage. (Source: Cameo RFI Response Report.)

The other building entrance at the eastern facade adjacent to the stepped access through the walled garden is a secondary access point. A ramp has not been provided alongside the secondary stepped access to the walled garden, as a significant length of the existing wall would need to be removed compromising the character of the Walled Garden and design intent. A ramp would also have impact on a mature Category A tree which is to be retained in this area. Both building entrances are accessible via the level boardwalk.

Applicant's Response to FI Item No. 14(h)

"Required measures to ensure pedestrian priority and aid visually impaired users where pedestrian accesses cross proposed carriageway."

Please refer to Cameo Partners Landscape Architects drawing C0135 L103 Rev 01 *Landscape General Arrangement Ground Floor - Combined Plan*. This shows the locations of tactile paving and pedestrian priority at road crossings.

Applicant's Response to FI Item No. 14(i)

"The provision of steps to rear pedestrian recreational route will exclude users and is not in accordance with the principles of Universal Design."

Where possible, all routes have been designed without steps. All amenity spaces are accessible by Part M compliant 2m wide resin bound routes. The two play areas to the rear of the site are served by an accessible pathway.

In addition to this, secondary stepped paths surfaced with bark mulch are provided where levels cannot be changed due to tree root protection areas. The revised design can be seen in the Cameo RFI Response Report and the following Cameo Drawings:

- C0135 L103 Rev 01 titled *Landscape General Arrangement Ground Floor - Combined Plan*, and
- C0135 L9001 Rev 01 titled *Pedestrian Access Diagram*.

Applicant's Response to FI Item No. 14(j)

"Set-down should be provided adjacent to all blocks in order to allow accessible drop off. Set down should be at or adjacent to, on accessible entrance, in accordance with Part M of the building regulations."

Five new set down places are being provided across the site. Each set down measures 2m x 8m and is provided in the following locations: at the Main Avenue in front of Block D, between Blocks E and F, to the east of Block F and at the south of the site at Block H and between Blocks I. The set down spaces will cater for accessible users and for delivery vehicles. For further information, please refer to RAU's *Response to request for further information - Design Statement*.

Applicant's Response to FI Item No. 14(k)

"The proposed shared road allows excessive visibility and does not include adequate self-regulating measures to function as a shared surface."

Roughan O'Donovan Consulting Engineers have prepared the response to this item, noting that the existing avenue is enclosed by trees, and its historic character is substantially maintained in the proposed scheme (save for the necessary passing bays, which have been woven in as sensitive a manner as practicable). The retention of the historic character will provide very effective traffic calming, underpinning its suitability as a shared space. The most effective self-regulating measure is the retention of the historic access avenue character, and any further intervention would appear to be contrived, and would detract from the character of the Dalguise landscape. Access along the avenue will be controlled and restricted to occupants, visitors, deliveries and emergency vehicles. There is no through route. On that basis, and supported by the Road Safety and Quality Audits, the Design Team does not consider any further interventions are either necessary or appropriate. The forward visibility that is available along the avenue is sufficient for intervisibility between passing bays and no more. This will encourage respectful behaviour between drivers, resulting in reduced travel speeds and increased safety for pedestrians.

Applicant's Response to FI Item No. 14(l)

"Access to surface level cycle parking to the south of Block D is via adjacent steps, loose bark chips with steps, or alternative longer and more onerous route via the Dalguise house building."

Cycle parking is accessible via a level entrance from the north of Block D. External bike spaces are accessible at the eastern entrance (4 stands) and to the south of the building. All external steps will be fitted with a bike rail where an immediate alternative level access is not available. These paths are resin bound.

The route to the west with bark chips is not intended to be used by cyclists due to the level changes, which cannot be altered due to root protection zones.

- C0135 L301 Rev 01 titled *Landscape General Arrangement Ground Floor - Combined Plan*, and
- C0135 L9001 Rev 01 titled *Pedestrian Access Diagram*.



Figure 15.2: Block D cycle access at Planning Application Stage vs Further Information Stage. (Source: Cameo RFI Response Report.)

Applicant's Response to FI Item No. 14(m)

"Set down area at Block E does not provide direct pedestrian access to Block E."

Direct pedestrian access is now provided between the set down at Block E and the entrance to Block E. See Cameo Partners *RFI Response*.

Please also refer to Cameo drawings:

- C0135 L103 Rev 02 titled *Landscape General Arrangement Ground Floor - Combined Plan*, and
- C0135 L9001 Rev 01 titled *Pedestrian Access Diagram* for further details.



Figure 15.3: Block E pedestrian link between set down area and entrance to Block Planning Application Stage (left) vs Further Information Stage (right). (Source: Cameo RFI Response Report.)

Applicant's Response to FI Item No. 14(n)

"Provision for impaired users on shared surface carriageway, including tactile paving, in accordance with Section 4.3.4 Pedestrianised and Shared Surfaces of DMURS."

Roughan O'Donovan Consulting Engineers have confirmed that no specific provision is required for the shared surface carriageway. Tactile warning paving is proposed at each interface with the other paths, as indicated on the landscape plans. This arrangement is wholly in compliance with Section 4.3.4 of DMURS, including, in particular, the following:

- Shared surface streets and junctions are highly desirable where movement priorities are low and there is a high place value in promoting more livable streets (i.e. homezones), such as on Local streets within Neighbourhood and Suburbs.
- The design includes verges that act as refuge zones allowing pedestrians to step on and off the carriageway to let cars pass. The provision of further tactile paving is not considered to be appropriate in the context of the historic setting and landscape at Dalguise House. There are numerous successful examples of shared use avenues in similar contexts, with similar road geometry and materials as prevail at Dalguise, for example, Howth Castle and Deer Park Golf Club beyond and Farmleigh, as well as many retail car parks – e.g. Sallynoggin retail park, Cornelscourt Convenience Shopping, Old Bray Road.

Please see Cameo Partners Drawing C0135 L103 Rev 01 titled *Landscape General Arrangement Ground Floor - Combined Plan*.

Applicant's Response to FI Item No. 14(o)

"Proposed Rill water features, drop offs and Stramps may present a danger to young and visually impaired users of various abilities."

The rill and the stramp have been omitted from the design. The drop off present due to the ramp is protected by a guardrail. Please refer to Cameo drawing C0135 L103 Rev 01 titled *Landscape General Arrangement Ground Floor - Combined Plan* for further details.

16.0 FURTHER INFORMATION ITEM NO. 15 – ROAD LAYOUT

"The Applicant shall submit a detailed road layout drawing in the form of a detailed and dimensioned site plan which clearly demonstrates road widths, surface material, signage, levels and gradients and allocation of parking spaces (set-down/delivery/residential/visitor) etc. The drawing shall also clearly demonstrate the provision of adequate self-regulating measures in order to reduce vehicle speeds across the site adequately. The layout shall be subject to the DMURS Street Design Audit to be prepared and submitted as part of the further information."

16.1 Applicant's Response to FI Item No. 15

The response to this Item has been prepared by Roughan O'Donovan Consulting Engineers and Byrne Looby Consulting Engineers, RAU and Cameo Partners Landscape Architects.

The enclosed ROD Drawings provide dimensions, road markings and allocation of parking spaces *Road Markings and Signage* – Sheet 01 of 03 to Sheet 03 of 03 (Dwg No. DSH ROD GEN SW_AE DR CH 300003 Rev 01; Dwg No. DSH ROD GEN SW_AE DR CH 300004 Rev 01; and Dwg No. DSH ROD GEN SW_AE DR CH 300005 Rev 01).

Car parking locations and allocations are as follows:

Residential

- 19 No. spaces at the Undercroft of Blocks B+C;
- 148 No. spaces in the Basement; and
- 38 No. spaces at surface to the South of the site (6 No. of these spaces, located to the west of Dalguise House, are for Car Share, 3 No. are assigned to the 3 No. houses).

Non-Residential

- 6 No. spaces for the Childcare Facility, located at surface at the Purbeck entrance and Undercroft of Blocks B + C; and
- 8 No. Spaces for the F+B located to the south of Block G.

Cameo Partners Landscape Architects Drawings *Landscape General Arrangement Ground Floor* Sheets 1-3 (Dwg Nos. C0135 L100 Rev 04; C0135 L101 Rev 05; C0135 L102 Rev 04), shows the proposed road materials are proposed:

- the existing avenue is to be surfaced with Paving Type 8, Buff Coloured Macadam;
- The roadway inside the new entrance from Purbeck will be Paving Type 4, Concrete Permeable Block;
- The space in front of Dalguise House will consist of reused cobbles existing on site;
- The one way loop around the back of the site will consist of Resin Bound Gravel.

The operation of the scheme as a BTR development will ensure a strong central management regime is in place. The *Operational Management Plan* (Section 9) prepared by Greystar and lodged with the Application in November 2022, detailed the central management system and mobility management at the scheme. The site will be managed 24/7 by onsite staff who will be able to direct new residents to their allocated car parking space, if they have one, or to visitor parking as required.

As noted in response to Item 14(a) the existing avenue is enclosed by trees, and its historic character is substantially maintained (save for the necessary passing bays). This will provide very effective traffic calming, underpinning its suitability as a shared space. The existing avenue will operate satisfactorily as a shared environment with increased usage. This approach also maximises the retention of the existing vegetation, and therefore minimises the impacts on flora and fauna.

The site layout has been subject to the enclosed Quality Audit, prepared by PMCE.

17.0 FURTHER INFORMATION ITEM NO. 16 – BASEMENT AND UNDERCROFT PARKING

“In accordance with Section 12.4.9 Design of Underground and Multi-Storey Car Parks of the current DLRCC County Development Plan, the Applicant shall submit drawings and details which clearly demonstrate that the proposed basement/undercroft parking meets the requirements set out in the UK’s Institution of Structural Engineers booklet entitled ‘Design Recommendations for Multi Storey and Underground Car Park Fourth Edition’ (2011) and any subsequent updates.

The following items in particular shall be clarified and addressed:

- a. Demonstration and dimensions of proposed gradients of all ramped areas.*
- b. Widths and turning radii in accordance with design recommendations requirements. (Proposed left turn to basement appears to be of narrow radius and overly constricted).*
- c. Separate access area for cyclists with appropriate gradients, should cycle parking be located within basement areas.*
- d. Headroom clearance to be confirmed in order to allow proposed access of refuse vehicles to waste storage area.*
- e. Design justification of proposed car park roundabout in lieu of STOP line.*
- f. Rationale for pedestrian access from undercroft parking to Block A.*
- g. All proposed Road Markings and signage to be shown on submitted drawings.”*

17.1 Applicant’s Response to FI Item No. 16

This response was prepared by Reddy Architecture and Urbanism, Byrne Looby Consulting Engineers and Roughan O’Donovan Consulting Engineers.

The basement layout has been updated in accordance with UK’s Institution of Structural Engineers booklet ‘Design Recommendations for Multi Storey and Underground Car Park Fourth Edition’ (2011) including the following:

- a) All ramp gradients, dimensions, and layouts.
- b) Parking bay sizes and aisle widths. The proposed entrance into the basement has been altered to remove previous narrow radius turn entrance.
- c) The creation of a separate cycle route into Block D and the Basement via the existing avenue using the existing site access.
- d) There is no access to refuse vehicles to the basement areas. Refuse will be collected at surface level. Sufficient headroom has been provided for disabled vehicles.
- e) The car park entrance has been revised, there is no longer a roundabout arrangement.
- f) Pedestrian access from Block A to the undercroft car parking under Blocks B and C is via the pedestrian crossing close to the bridge and through the pedestrian/cycle entrance to the undercroft on the norther façade of Block B. This route provides pedestrians with a safe route between Block A and the car parking.
- g) All road markings are shown in ROD Drawings *Road Markings and Signage* – Sheet 01 of 03 to Sheet 03 of 03 (Dwg No. DSH ROD GEN SW_AE DR CH 300003 Rev 01; Dwg No. DSH ROD GEN SW_AE DR CH 300004 Rev 01; and Dwg No. DSH ROD GEN SW_AE DR CH 300005 Rev 01).

18.0 FURTHER INFORMATION ITEM NO. 17 – AUTOTRACK

“The Applicant is requested to submit revised vehicle movement drawings in order to demonstrate two-way vehicle access in basement and undercroft area and to adequately assess required changes. E.g., 2-way vehicular movements along basement access route.”

18.1 Applicant’s Response to FI Item No. 17

See enclosed Byrne Looby Drawings *Basement Parking Autotracking* (Dwg No. W3683-DR-1006 Rev 06) which shows two way vehicular routes at Basement and Undercroft.

19.0 FURTHER INFORMATION ITEM NO. 18 – TRAVEL PLAN

“The Applicant is requested to submit revised drawings and details which demonstrate the following items in relation to the submitted Travel Plan:

- a. Car sharing scheme parking locations.*
- b. Written undertaking from a car sharing scheme provider to provide said scheme.*
- c. Location of EV charging points.*
- d. Location of proposed loading zones for each block.”*

19.1 Applicant’s Response to FI Item No. 18

The *Travel Plan*, prepared by Roughan O’Donovan has been updated and is appended to the updated EIA:

- Six car share spaces are identified at surface level to the south of Block G, close to the central open space, see RAU Drawing *MKS-RAU-ZZ-00-DR-AR-100-Rev P02*, enclosed with the Response to Further Information.
- A Letter dated 12th May 2023 from GoCar, Irelands leading car share provider, is attached to the enclosed *Travel Plan*, appended to the enclosed EIA. This letter confirms that the intention is to provide six vehicles at the end of phase 1 of the development.
- The EV charging points are identified on the enclosed Metec Drawings, and all car parking spaces are provided with ducting to allow for the future roll out of EV charging across the site:
 - *Electrical Services Installation – Basement Level EV Charing Layout*, Dwg No. MKS-MET-ZZ-01-DR-E-6901 Rev 03
 - *Electrical Services Installation – Ground Level EV Charging Layout -Sheet 1 of 2*, Dwg No. MKS-MET-ZZ-ZZ-DR-E-6902A Rev 02
 - *Electrical Services Installation – Ground Level EV Charging Layout -Sheet 2 of 2*, Dwg No. MKS-MET-ZZ-ZZ-DR-E-6902B Rev 02
- Loading zones are provided at the Main Avenue in front of Block D, between Blocks E and F, to the east of Block F and at the south of the site at Block H and between both Blocks I, see RAU Drawing *MKS-RAU-ZZ-00-DR-AR-100-Rev P02*, enclosed with the Response to Further Information. These spaces will serve a dual function as set down areas also with onsite management available to manage any conflicts that could arise.

20.0 FURTHER INFORMATION ITEM NO. 19 – TAKING IN CHARGE

“On foot of the further information request the Applicant shall submit revised site layout drawings which clearly identify all and any areas to be taken in charge, or alternatively, to confirm that it is not envisaged that any areas will be taken in charge.”

20.1 Applicant’s Response to FI Item No. 19

As noted in the LRD Application Form 19 submitted with the original Planning Application documentation, no part of the proposed development is planned to be taken in charge. Therefore, no associated drawing is enclosed.

21.0 FURTHER INFORMATION ITEM NO. 20 – GREEN/BLUE ROOF

“The applicant is requested to submit details of the total roof area for each building, the total green roof provision for each building and total blue roof area, as well as an overall figure for the site. The green roof provision should meet the requirements as set out in the Council's Green Roof Policy, Appendix 7 of the County Development Plan 2022-2028. In addition, the extent of blue roof type structure at podium level should be identified on a drawing. A cross section of the proposed planting on the green roof shall be provided. The applicant shall also provide details of maintenance access to the green roofs and should note that, in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangements such as external mobile access that will be centrally managed. The applicant should comment on the compatibility of the green roof with PV panels if they are to be incorporated into the design.”

21.1 Applicant’s Response to FI Item No. 20

This response was prepared by Byrne Looby Consulting Engineers.

The Drainage Impact Assessment prepared by Byrne Looby enclosed with this response, details the total roof area of the proposed buildings, the total green/blue roof areas as well as overall figures, see Section 5.2.5 of that Report. The green/blue roof provision complies with the requirements of Appendix 7 of the DLR Development Plan, 2022-2028. The proposed blue roof type structure has been removed at podium level.

Byrne Looby Drawing Green/Blue Roof Systems Layout and Site Locations Dwg No. W3683-DR-1026 Rev 04, provides the Roof Plan showing the location of PV panels on areas outside of the green/blue roof areas (the individual building green/blue roof area is tabled here), in addition to a Section showing the proposed build up.

Minimum maintenance is required for the green roof system, access is provided to rooftop via AOV’s in Stairwells.

22.0 FURTHER INFORMATION ITEM NO. 21 – EMERGENCY ACCESS ROAD

“Byrne Looby drawing River Crossing Sections (W3683-DR-1033) shows the emergency access road 3m above ground level. It is not clear from the drawings the drainage arrangements for this road. Landscaping drawings show there is a reinforced grass finish. The applicant is requested to clarify the drainage arrangements for this road.”

22.1 Applicant’s Response to FI Item No. 21

The emergency access road is with be built up with stabilised excavated material with a Grasscrete surface. No drainage provided in this area as the emergency road will be self-draining. Please refer to Byrne Looby Drawing River Cross Sections Dwg. No. W3683-DR-1033 Rev 02.

23.0 FURTHER INFORMATION ITEM NO. 22 – INFILTRATION

“The applicant has stated that concrete tanks shall be provided, due to the poor SI results. However, the applicant is requested to consider the use of a system that promotes infiltration (for tanks not located under buildings), which will allow some nature recharge.”

23.1 Applicant’s Response to FI Item No. 22

This response was prepared by Byrne Looby Consulting Engineers. The Drainage Impact Assessment prepared by Byrne Looby enclosed with this response addresses this Item particularly Section 5.3, which states:

“Using the microdrainage software, the volumes of the required attenuation for the site as shown in Appendix D result in the following tank volumes:

Upper Catchment stormcell tank 1 is 640m³. Modelled with a 5.2 l/s discharge @ 1.98m head.

Upper Catchment tank 2 is 360m³ modelled with 8.9 l/s discharge @ 1.45m head.

These tanks have been designed for a 1:100 year storm event accommodating a 20% climate change and runoff rates for summer and winter (Cv) at a value of 1.0 to ensure accurate simulation results as per Appendix 7 the DLRCC Development Plan 2022-2028 requirements for sizing the attenuation tanks.

The filtration test results across the site indicates that infiltration of water through the soil is not possible, however at the request of DLR, stormcell tanks have been provided in areas free of buildings to allow some nature recharge, if ever possible. The above volume of water is critical, the change from concrete material to stormcell tanks where suitable is possible ensuring the above volumes are accommodated.”

Therefore, the proposed development facilitates infiltration if it is possible. Please refer to the enclosed Byrne Looby Drawings:

- Upper Catchment Tank 1 Details Dwg No. W3683-DR-1035 Rev 01
- Lower Catchment Tank Details Dwg No. W3683-DR-1037 Rev 01.

These proposed concrete attenuation tanks have been changed to a proposed geocellular tank solution.

24.0 FURTHER INFORMATION ITEM NO. 23 – DRAINAGE FOR ACCESS ROAD

“There are no drainage plans for the access road. The applicant is requested to clarify the drainage proposals for the road. It should be noted; no surface water shall leave the site unattenuated.”

24.1 Applicant’s Response to FI Item No. 23

This response was prepared by Byrne Looby Consulting Engineers.

Given the proximity of existing trees along the existing access road, ACO drains will be installed either side of the road which will connect into the main sites storm drainage network. This solution will avoid excavation and disruption of the Root Protection Zones of the trees to be retained at this location.

25.0 FURTHER INFORMATION ITEM NO. 24 – ATTENUATION TANKS/FLOOD RISK

“The applicant is requested to submit a drawing showing the proposed attenuation tanks in relation to the existing flood zones (unaltered). The tanks should be located outside of the flood zone, both for the existing flood scenario and the proposed.”

The Drainage Impact Assessment Report notes that incidental rainfall in the basement will be directed to the attenuation tank. This should be directed to the foul network. The applicant shall update this statement and ensure the drawings correctly show the drainage going to the foul network.”

25.1 Applicant’s Response to FI Item No. 24

This response to this Item was prepared by Byrne Looby Consulting Engineers.

Please refer to McCloys Consulting Engineers flood drawings M02136-04_FL50 and M02136-04_FL60, for the existing and proposed flood layouts and refer to Byrne Looby Drawing Proposed Utilities Plan – Surface Water Drainage Layout Dwg No. W3683-DR-1014 Rev 11 to see the location of the attenuation tanks. Both attenuation tanks are clearly outside of the existing Flood zone.

Please refer to updated foul layout drawing Byrne Looby Drawing Proposed Utilities Plan – Foul Drainage Layout Dwg No. W3683-DR-1007 Rev 07, showing the rainfall in the undercoft area under Blocks B and C being collected into the Foul Water System. The Byrne Looby Drainage Impact Assessment and Engineering Services Report has been updated to reflect this.

26.0 FURTHER INFORMATION ITEM NO. 25 – FLOOD RISK ASSESSMENT

“The applicant has stated that Block A, B and C are located outside the Flood Zones in the existing scenario, with Figure 4.2 showing detail of the flood zones as well as the block locations. It appears Block B is located outside of the flood zone, however due to the scale of the figure, and no other drawing included showing these extents, it cannot be confirmed. Further information point 1 deals with this issue.

The applicant is requested to submit plan drawings showing the flood extent and depth on site, as a result of a blocked culvert at the Richmond Green culvert as well as the Alma Place culvert.

The applicant shall identify any mitigation measures required to deal with flooding predicted on the proposed development site.

The applicant is requested to submit plan drawings showing existing and proposed flood extents to be overlaid to show change the in-flood extents, in addition, a comparison of the change in depths should be provided on a plan drawing.

Cross sectional drawings showing the revised alterations to the riverbank shall be provided at a number of locations.

While overland flow routes have been identified, the analysis of blockage does not seem to be included.

The applicant is requested to include the analysis and provide comment on the proposed surface water drainage system in the event of blockage or partial blockage of the system, commenting on any surcharging or flood risk that may be identified.”

26.1 Applicant’s Response to FI Item No. 25

This response has been prepared by Byrne Looby in conjunction with McCloy Consulting.

FRA and Blocks B and C

We note that Further Information point 1 referred to in the quote above appears to be the 1st point raised respect of the Site Specific Flood Risk Assessment in DLRCC’s Drainage Planning Report, which is not part of the Request for Further Information but which states:

‘1. The applicant is requested to submit a drawing showing the proposed development overlain with the existing flood zones, at an appropriate scale. Should it be found that Block B is located within the flood zone, the building will need to be repositioned to ensure it meets the requirements of Appendix 15 (Strategic Flood Risk Assessment) of the Dun Laoghaire-Rathdown County Development Plan 2022-2028, such that no development is permitted within an existing flood zone at this location.’

Refer to Updated *Flood Risk Assessment* (M02136-04_DG02, Rev 6) prepared by McCloy Consulting. In addition to Figure 4.2, noted by DLRCC as being an unsuitable scale, the figure has been produced in a standalone flood map included in the appendices. Plan drawings / flood maps are provided in the appendices of the flood extents due to culvert blockage at the site, as requested by DLRCC. The FRA and accompanying maps outline how culvert blockage causes minimal (c. 10mm) changes in flood levels at the site so there will be negligible difference between flood extents of that and non-blockage

scenarios. Plan drawings / flood maps showing comparison of pre- and post-development flood maps have also been produced as requested and included in the FRA appendices.

All flood maps demonstrate that in each iteration, the floor plates are located outside the flood zones.

Mitigation Measures

The risks and mitigation measures are identified in Section 5 of the FRA. The main mitigation measures are to locate the buildings out of the flood zone and to set the SSL (16.0mOD) for the undercroft and the FFL (16.0mOD) of Block A (Childcare Facility) above the flood level (15.84mOD) and the modelling and flood maps indicate that any site flooding is captured in the drainage system or in various SUDS measures identified in the Drainage Impact Assessment Report (W3683-BLP-XX-XX-RP-Z-04).

Cross Sectional Drawings

It is not proposed to make any alterations to the river bank with the exception of the bridge over Purbeck Road. The proposed bridge is detailed in the Byrne Looby drawing W3683-DR-1009-02. The River Cross Sections, and various flood levels, are noted on the Byrne Looby drawing W3683-DR-1033-02.

Flood Extents

Refer to Updated *Flood Risk Assessment* (M02136-04_DG02, Rev 6) prepared by McCloy Consulting. In addition, eight maps outlining the output from the flood model are provided. The maps include:

- Flood Zone mapping;
- Proposed Development overlain with Flood Zones;
- Proposed Scenario, Present Day;
- Proposed Scenario, Climate Change;
- Flood Extent Map – Richmond Green Culvert Blockage;
- Flood Extent Map – Alma Place Culvert Blockage;
- 1% AEP Pre and Post Development comparison;
- 0.1% AEP Pre and Post Development comparison.

Overland Flows

Analysis of blockages has been carried out and it is detailed in the Byrne Looby *Engineering Services Report* and indicated on the Byrne Looby drawing W3683-DR-1041-03.

Surface Water Drainage System

Byrne Looby Consulting Engineer’s *Drainage Impact Assessment* (Section 5.3) has been updated to provide an analysis and comment on the proposed surface water drainage system arising from blockage or partial blockage. The Assessment states:

“As part of the storm network review, the effect of blockages occurring at critical points in the system were examined in order to ensure that any flood flows will be away from buildings. The locations chosen and consequential flows are listed below. The effect of blockages occurring at

critical points in the system were examined in order to ensure that any flood flows will be away from buildings. The locations chosen and consequential flows are listed below.

The effect of blockages occurring at critical points in the system were examined in order to ensure that any flood flows will be away from buildings or captured by suds measures. The scenarios modelled and the consequential flows are listed below. Refer to drawing W3683-DR-C-1041 for the flood location during scenarios 1 and 2.

Scenario 1 - 30 year storm + 50% blockage on upper catchment stormcell tank no. 1 inlet: flooding at SWMH S7 opposite block J and the coach house will flow away from the buildings and be captured by tree pits and permeable paving.

Scenario 2 - 30 year storm + 99% blockage on upper catchment stormcell tank no. 1 outlet flooding at

SWMH S7 opposite block J and the coach house will flow away from the buildings and be captured by tree pits and permeable paving.

Scenario 3 - 30 year storm + 50% blockage on upper catchment tank no. 2 inlet: no flooding

Scenario 4 - 30 year storm + 99% blockage on upper catchment tank no. 2 outlet: no flooding

Scenario 5 - 30 year storm + 50% blockage on lower catchment stormcell tank inlet: no flooding

Scenario 6 - 30 year storm + 99% blockage on lower catchment tank outlet: no flooding

Note that SWMH S7 is located at the lowest point of the site, any flooding that occurs due to blockages will be captured by the surrounding SUDs systems."

In summary, there is no flood risk arising from blockages or partial blockages of the surface water drainage system. See Byrne Looby Drawing W3683-DR-1041 Rev 03.

27.0 FURTHER INFORMATION ITEM NO. 26 – PUBLIC LIGHTING

"The submitted Public Lighting scheme is not acceptable by reason of failure to accord with the necessary lighting standards and the tree conflicts arising within the proposed scheme. The Applicant is requested to revise same."

27.1 Applicant's Response to FI Item No. 26

This section has been prepared in association with Metec Consulting Engineers, who have prepared the enclosed Lighting Report and associated drawings:

- MKS-MET-ZZ-ZZ-DR-E-6001A Rev P04 *Electrical Services Installation - Site Lighting layout - Sheet 1 of 2*
- MKS-MET-ZZ-ZZ-DR-E-6001B Rev P04 *Electrical Services Installation - Site Lighting layout - Sheet 2 of 2*
- MKS-MET-ZZ-ZZ-DR-E-6002A Rev P02 *Electrical Services Installation - Site (Feature) Lighting layout - Sheet 1 of 2*
- MKS-MET-ZZ-ZZ-DR-E-6002B Rev P02 *Electrical Services Installation - Site (Feature) Lighting layout - Sheet 2 of 2*

No part of the proposed development is proposed to be taken in charge. The proposed development is a BTR Scheme and the ownership and use of the units will be restricted by legal agreement for 15 years.

The proposed lighting has been split into two separate sets of drawings prepared by Metec:

The first set of drawings (entitled *Site Lighting Layout*) is designed to comply with the relevant standards. These lights relate to the vehicular routes (including the emergency access route to the northeast and the fire access route to the west of the site) and the primary pathways through the public open spaces areas and car parking.

The second set of drawings (entitled *Site (Feature) Lighting*) is additional lighting that is not required to be designed to accord with the relevant Local Authority standards, however have been designed to comply with Part M of the Building Regulations. This includes pedestrian routes around the periphery of the site, some of which transect communal open spaces areas, others like the woodland walk to the northwest of the site are not counted as either communal nor public open space (due to steep level changes), these are not being taken in charge and are not on direct routes to Public Transportation and the site exits.

In relation to 'tree conflicts' the spacing provided for in the Metec Consulting Engineers *Site Lighting Layout* drawings allows for flexibility, column positions can be adjusted to avoid conflicts with trees. A key consideration in the design of the proposed development was the character of the site provided by the Protected Structure and the mature trees. The scheme seeks to retain as many of the quality trees as possible, in the interests of visual amenity and to protect biodiversity.

The lighting in the most densely used parts of the site (by pedestrians, cyclists and vehicle drivers) are in accordance with the standards. The rest of the lighting proposed is suitable for the subject site which needs sympathetic treatment due to the Protected Structure and the existing trees.

28.0 FURTHER INFORMATION ITEM NO. 27 – CONSTRUCTION MANAGEMENT

“The Applicant is requested to submitted comprehensive documentation/ report in respect of the following:

- a. *A Construction and Demolition Waste Management Plan, which includes*
 - (i) *Materials Source and Management Planning identifying type of materials/proportion of re-use/recycled materials and future maintenance to support the implementation of Government and EU circular economy policy and*
 - (ii) *Procedures to enable tracking of all waste generated to final destination*
- b. *A Construction Management Plan which includes Environmental Management and Monitoring Proposals and Complaints management Proposals.*
- c. *A Noise Planning Report, prepared by suitably qualified specialists detailing noise modelling in relation to anticipated noise levels in the completed development and design of building services in the completed development, such as heat pumps, to avoid creation of nuisance affecting adjoining residential areas. Said report should include detailing a selection of construction methodology, implementation of mitigation measures to minimise nuisance affecting adjoining properties.*
- d. *An Operational Waste Management, which sets out proposals for segregation and management of waste, including segregation and secure storage of clinical waste, within the completed development to support EU and National Policy.”*

28.1 Applicant’s Response to FI Item No. 27

A Resource Waste Management Plan, prepared by AWN, is provided at Appendix 18.1 of the Environmental Impact Assessment Report, which has been updated for the Response to Further Information.

The *Construction and Environmental Management Plan*, prepared by Byrne Looby, in association with other relevant Design Team members has been updated. It includes environmental management and monitoring proposals and a complaints management proposal. The Applicant anticipates that if the Planning Authority is minded to grant planning permission, that a standard Condition would be attached to the permission requiring the agreement in writing with the Planning Authority of a *Construction and Environmental Management Plan* prior to commencement of development.

A Noise Impact Assessment has been prepared by AWN and is enclosed with this Further Information Response in respect of Item 27(c), the EIAR has also been updated accordingly.

An *Operational Waste Management Plan*, prepared by AWN, is provided at Appendix 18.2 of the Environmental Impact Assessment Report, which has been updated for the Response to Further Information. No clinical waste will arise from the proposed development, which comprises residential units, café/restaurant and a childcare facility.

29.0 FURTHER INFORMATION ITEM NO. 28 – ARCHAEOLOGICAL IMPACT ASSESSMENT

“The Development Applicants Unit of the Department of Housing, Local Government and Heritage do not agree with the recommends set out in Chapter 11 of the submitted Environmental Impact Assessment Report (EIAR) which recommends that all topsoil stripping associated with the proposed development be monitored by a suitably qualified archaeologist. Given the relatively large scale of the proposed development, it is possible that hitherto previously unknown archaeological features/deposits may be disturbed during the course of groundworks required for the proposed development. Therefore, in line with national policy—see Section 3.7.2 of Frameworks and Principles for the Protection of the Archaeological Heritage 1999—the Department recommends that an Archaeological Impact Assessment (including Archaeological Test Excavation) be carried out as Further Information. A report containing the results of this assessment should be submitted to the Department and to the Planning Authority prior to any planning decision so as to facilitate the formulation of an appropriate and informed archaeological recommendation. The Archaeological Impact Assessment shall be carried out as follows:

1. *The applicant is required to engage the services of a suitably qualified Archaeologist to carry out the Archaeological Impact Assessment (AIA) which should include a programme of Archaeological Test Excavation to respond to this request for Further Information. No sub-surface work shall be undertaken in the absence of the archaeologist without his/her express consent.*
2. *The archaeologist shall inspect the proposed development site (PDS) and detail the historical and archaeological background of the site (consulting appropriate documentary sources) and review all cartographic sources and aerial photographs for the area.*
3. *The Archaeological Test Excavation must be carried out under licence from the National Monuments Service and in accordance with an approved method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application and method statement.*
4. *Test trenches shall be excavated at locations chosen by the archaeologist, having consulted the site drawings. Excavation is to take place to the uppermost archaeological horizons only, where they survive. Where archaeological material is shown to be present, the archaeologist shall stop works pending further advice from the Department. Please note that all features/archaeological surfaces within the test trenches are to be hand-cleaned and clearly visible for photographic purposes.*
5. *Having completed the work, the archaeologist shall submit a written report to the Department and to the Local Authority describing the findings of the AIA and the results of the Archaeological Test Excavation. The report shall comment on the degree to which the extent, location and levels of all proposed foundations, service trenches and other sub-surface works required for the development will affect the archaeological remains. This should be illustrated with appropriate plans, sections, etc.*
6. *Where archaeological material is shown to be present, further mitigation measures will be required; these may include refusal, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate. The Department will advise the Local Authority with regard to these matters. No decision should be made on this application until the Department and the Local Authority have had the opportunity to fully evaluate the findings of the AIA.*

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.”

29.1 Applicant’s Response to FI Item No. 28

IAC Archaeology prepared the enclosed *Archaeological Assessment* to study the impact, if any, on the archaeological and historical resource of a proposed residential development, which is located at Dalguise House, Monkstown, County Dublin. The report was undertaken by Fergal Murtagh of IAC Archaeology under Licence No. 23E0209 and in response to the Request for Further Information issued by the Planning Authority.

The *Archaeological Assessment* is enclosed at Appendix 14.1 of the Environmental Impact Assessment. Chapter 14 of the EIA, Cultural Heritage and Archaeology, has been updated to reflect the Archaeological Assessment.

In summary, the report identified the following:

“Archaeological testing was carried out over the course of three days during April 2023.

No features of archaeological potential were identified during the course of archaeological testing. *It remains possible that isolated or small-scale features may survive within the proposed development area but outside of the footprint of the test trenches. Ground disturbances, prior to the application of mitigation, have the potential to directly and negatively impact any such remains. Impacts may range from moderate to significant, dependant on the nature, extent and significance of any archaeology identified.*

It is recommended that all topsoil stripping associated with the proposed development be monitored by a suitably qualified archaeologist. *If any features of archaeological potential are discovered during the course of the works further archaeological mitigation may be required, such as preservation in-situ or by record. Any further mitigation will require approval from the National Monuments Service of the Department of Housing, Local Government and Heritage.”*

The Applicant is willing to accept a Condition which requires that all topsoil stripping associated with the proposed development be monitored by a suitably qualified archaeologist as per the recommendation of the Archaeologist.

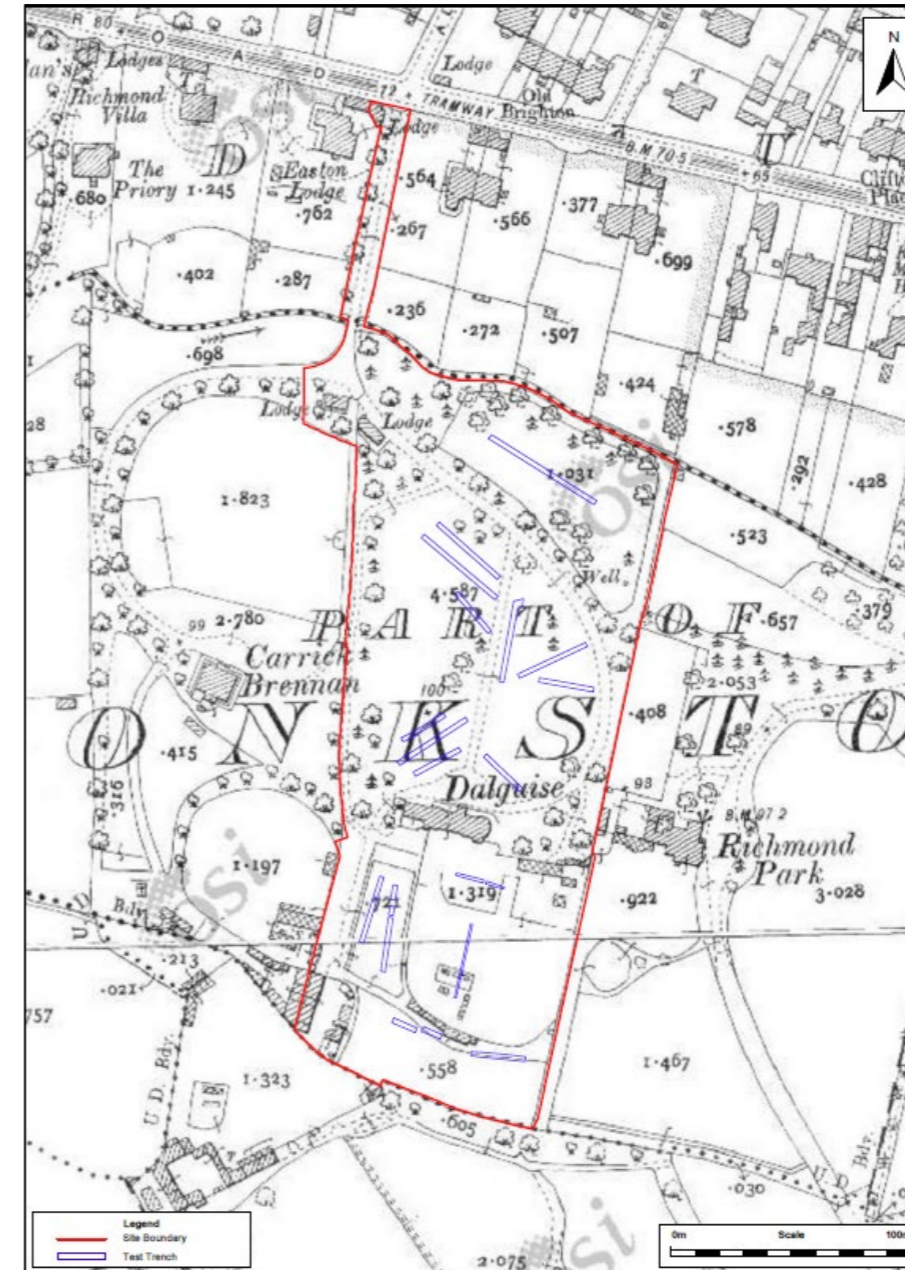


Figure 29.1: Test trenches (identified in blue) were dug throughout the site (identified by the redline). (Source: Figure 3, IACL Archaeological Assessment, 2023.)

30.0 FURTHER INFORMATION ITEM NO. 29 – EIAR

“Following assessment of the submitted Environmental Impact Assessment Report (EIAR) it is considered that the submitted EIAR fails to adequately assess the following matters and revised information in respect of same is required.

The Applicant is advised to ensure that all details are consistent throughout the submitted reports and documents, including the EIAR. The following amendments are required:

1. Submission of an updated Construction Environmental Management Plan (CEMP) which accords with the requirements of Further information Item no. 26 and which specifically addressed the following:

- a. All information shall be fully aligned with the information presented in the EIAR, including any information provided or revised on foot of this request for further information.*
- b. All discrepancies and gaps shall be resolved including but not limited to working hours including procedures for screening and approval of out of hours working, excavation proposals, details of rock breaking, spoil quantities, groundwater management, surface water management, management of cementitious materials including locations of facilities for concrete batching, handling, washout etc, lighting controls and for construction plan for new bridge across the Stradbroke Stream.*
- c. The revised report shall clearly set out how all construction monitoring will be carried out in accordance with the information presented in the EIAR and ly [clearly?] show how the monitoring will ensure that environmental effects will not exceed limits set out in the EIAR. Monitoring proposals shall include clear actions that will be put into effect in event of exceedance of trigger values or failure of mitigation measures.*
- d. The detailed CEMP shall include clear reporting procedures that ensure adequate transparency and accessibility of compliance information for all stakeholders. It shall also include a clear programme and procedures for review and updating at appropriate intervals.*

2. The applicant is requested to revise Chapter 9 of the EIAR to ensure that it:

- a. is based on accurate and up to date information on the project characteristics including but not limited to extent of excavations and spoil volumes;*
- b. is aligned with information presented elsewhere in the EIAR and in the CEMP, taking account of relevant revisions made on foot of this request for further information;*
- c. provides a compliant assessment of hydrogeological effects of the proposal; and*
- d. provides sufficiently detailed site-specific information on proposals for management of groundwater to show how effects will be avoided or managed and monitored.*

3. Submission of an updated Noise Planning report, which accords with the requirements of Item no. 26 and which also provides a

- a. detailed analysis of the noise impacts of the demolition and construction phases on the receiving environment should be predicted and mitigation measures proposed, especially for any potential rock braking/piling activities.*
- b. The noise levels predicted for site activities relating to site clearance are predicted to be in the range of 76 to 82 LAeq, T at a distance of 10 meters. 82dB seems like a fairly low estimate*

for piling activity, especially for the area in which the proposed Blocks A, B and C are located. The 3 cable percussion boreholes in this area (BH 01, 02, 04) mentioned in The Ground Investigation Report Appendix all encountered obstruction ‘Presumed rock or boulder’ at depths between 2.1 and 3.7 meters, which suggests a high likelihood that any piling activities in these areas will encounter similar obstruction which will increase the duration and noise levels. Clarification of the predicted noise levels and noise sensitive locations should be included should rock be encountered.

- c. Taking the above into account the possibility of a prolonged period of rock breaking should be investigated and the potential noise and vibration impacts on noise sensitive locations be predicted.*
- d. The impact of any potential excessively noisy works on neighbouring properties shall be predicted and measures suggested for reducing the impact of such works. Including adjusting working hours and setting a trigger point noise level that if exceeded works will stop and additional noise attenuation measures implemented.*
- e. A plan for continuous dust, noise and vibration monitoring shall be included, identifying the nearest noise sensitive locations at each boundary.*
- f. Considering the size of the subject site a more representative baseline noise survey may be required. The survey should take measurements at various locations within the site, identifying the closest noise sensitive locations in each area. The noise survey shall include an inward noise impact assessment and consider ProPG: ‘Professional Practice Guidance on Planning and Noise for new Residential Development’ and BS 8233 ‘Guidance on Sound Insulation and Noise Reduction for Buildings’*
- g. Preparation of a report by suitably qualified specialists detailing noise modelling in relation to anticipated noise levels in the completed development and design of building services in the completed development, such as heat pumps, to avoid creation of nuisance affecting adjoining residential areas. The Applicant is advised to have regard to FI item no. 26 also .*
- h. Preparation of a report detailing selection of construction methodology, implementation of mitigation measures to minimise nuisance affecting adjoining properties. The Applicant is advised to have regard to FI item no. 26 also.*

4. In relation to Chapter 13 of the EIAR report: Landscape and Visual, the applicant is requested to revise the assessments of the effects on Views 05, 06, 09 and 13 to ensure that they follow best practice and have due regard relevant guidelines including EPA, 2022, Institute of Environmental Management and Assessment, 2013 and Landscape Institute, 2017. The Applicant is advised to ensure all details are consistent with the requirements of Further Information Item no. 4, as detailed under the Planning Section of the Further information request.

5. In relation to chapter 14 of the EIAR Report : Cultural Heritage and Archaeology, the applicant is requested to ensure that all details are consistent with the requirements of the Further information Item no. 27, as detailed above.

6. The conclusion of Chapter 14 ‘Cultural Heritage and Archaeology’ and Chapter 15 Architectural Heritage’ indicates that no predicated residual impacts upon the archaeological heritage report or cultural heritage resource were identified however, it has not been detailed how the Applicant arrived at that conclusion. Therefore the Applicant is requested to submit the rationale which informed the conclusion and clearly reference same in Chapters 14 and 15. The

Applicant shall have regard to further information item's no.4, 8, 9 and 27 in responding to this request.

7. The submitted details in respect of soil volumes as detailed within the application and associated reports are inconsistent. The volume of material to be excavated has been estimated by the project engineers (Byrne Looby) at c. 68,123m³. However these figures do not correlate with the details set out in Chapter 9 titled *Lands, Soils, Geology and Hydrology of the EIAR*. The Applicant is required to clarify same and submit consistent details for assessment. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters.

8. The Applicant is requested to revise the content of Chapter 17 of the EIAR report in order to address the concerns raised by Transportation Planning and as detailed in Item's 10-18 of the Further Information request. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters, also taking account of relevant revisions/ update reports/ design amendments etc made on foot of this request for further information.

9. The applicant is requested to revise Chapter 19 [Built Services] insofar as required to ensure that the chapter including all mitigation measures are fully aligned with information presented elsewhere in the EIAR and other application documents including the CEMP and the Arborist's report, taking account of relevant revisions made on foot of other parts of this request for further information.

10. The applicant is requested to revise the Non-Technical Summary ensuring that is a summary that does not repeat whole sections of the EIAR. The revised version shall take account of revisions made foot of other parts of this request for further information, as relevant.

The Applicants attention is drawn to the other Further Information Request items as listed in this schedule and is advised to ensure that ALL relevant chapters in the EIAR are updated, including *inter alia*; Chapters 7, 8,9,11,12,13,14,15,17 and 18. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters, also taking account of relevant revisions/ update reports/ design amendments etc made on foot of this request for further information."

30.1 Applicant's Response to FI Item No. 29

The EIAR has been updated for the Response to Further Information and any changes arising.

30.1.1 Construction Environmental Management Plan (CEMP)

"1. Submission of an updated Construction Environmental Management Plan (CEMP) which accords with the requirements of Further information Item no. 26 and which specifically addressed the following:

- a. All information shall be fully aligned with the information presented in the EIAR, including any information provided or revised on foot of this request for further information.
- b. All discrepancies and gaps shall be resolved including but not limited to working hours including procedures for screening and approval of out of hours working, excavation proposals, details of rock breaking, spoil quantities, groundwater management, surface

water management, management of cementitious materials including locations of facilities for concrete batching, handling, washout etc, lighting controls and for construction plan for new bridge across the Stradbrook Stream.

- c. The revised report shall clearly set out how all construction monitoring will be carried out in accordance with the information presented in the EIAR and ly [clearly?] show how the monitoring will ensure that environmental effects will not exceed limits set out in the EIAR. Monitoring proposals shall include clear actions that will be put into effect in event of exceedance of trigger values or failure of mitigation measures.
- d. The detailed CEMP shall include clear reporting procedures that ensure adequate transparency and accessibility of compliance information for all stakeholders. It shall also include a clear programme and procedures for review and updating at appropriate intervals."

By way of clarification, we consider that references in RFI Item No. 26 (Public Lighting) above are in error and are supposed to refer to Item No. 27 (Construction Management).

The Construction Environmental Management Plan (CEMP) prepared by Byrne Looby Consulting Engineers has been updated as per RFI Item No. 27. The CEMP has been updated to reflect the changes made at RFI Stage.

It is anticipated that any grant of planning permission issued on foot of this Application would include a Condition requiring the submission of a CEMP for the written agreement of the Planning Authority prior to commencement, which would also require compliance with the EIAR mitigation measures.

30.1.2 Land, Soils, Geology and Hydrology (Chapter 9)

"2. The applicant is requested to revise Chapter 9 of the EIAR to ensure that it:

- a. is based on accurate and up to date information on the project characteristics including but not limited to extent of excavations and spoil volumes;
- b. is aligned with information presented elsewhere in the EIAR and in the CEMP, taking account of relevant revisions made on foot of this request for further information;
- c. provides a compliant assessment of hydrogeological effects of the proposal; and
- d. provides sufficiently detailed site-specific information on proposals for management of groundwater to show how effects will be avoided or managed and monitored."

Chapter 9 of the EIAR has been updated to reflect the above. A revised CEMP prepared by Byrne Looby is also enclosed with the Response to Further Information. Please see enclosed Byrne Looby Drawings which provide the final spoil volumes:

- Cut and Fill Plan, Dwg No. W3683-DR-1043 Rev 01
- Cut and Fill Section, Dwg No. W3683-DR-1044 Rev 01.

30.1.3 Noise Planning Report

“3. Submission of an updated Noise Planning report, which accords with the requirements of Item no. 26 and which also provides a

- a. detailed analysis of the noise impacts of the demolition and construction phases on the receiving environment should be predicted and mitigation measures proposed, especially for any potential rock braking/piling activities.*
- b. The noise levels predicted for site activities relating to site clearance are predicted to be in the range of 76 to 82 LAeq, T at a distance of 10 meters. 82dB seems like a fairly low estimate for piling activity, especially for the area in which the proposed Blocks A, B and C are located. The 3 cable percussion boreholes in this area (BH 01, 02, 04) mentioned in The Ground Investigation Report Appendix all encountered obstruction ‘Presumed rock or boulder’ at depths between 2.1 and 3.7 meters, which suggests a high likelihood that any piling activities in these areas will encounter similar obstruction which will increase the duration and noise levels. Clarification of the predicted noise levels and noise sensitive locations should be included should rock be encountered.*
- c. Taking the above into account the possibility of a prolonged period of rock breaking should be investigated and the potential noise and vibration impacts on noise sensitive locations be predicted.*
- d. The impact of any potential excessively noisy works on neighbouring properties shall be predicted and measures suggested for reducing the impact of such works. Including adjusting working hours and setting a trigger point noise level that if exceeded works will stop and additional noise attenuation measures implemented.*
- e. A plan for continuous dust, noise and vibration monitoring shall be included, identifying the nearest noise sensitive locations at each boundary.*
- f. Considering the size of the subject site a more representative baseline noise survey may be required. The survey should take measurements at various locations within the site, identifying the closest noise sensitive locations in each area. The noise survey shall include an inward noise impact assessment and consider ProPG: ‘Professional Practice Guidance on Planning and Noise for new Residential Development’ and BS 8233 ‘Guidance on Sound Insulation and Noise Reduction for Buildings’*
- g. Preparation of a report by suitably qualified specialists detailing noise modelling in relation to anticipated noise levels in the completed development and design of building services in the completed development, such as heat pumps, to avoid creation of nuisance affecting adjoining residential areas. The Applicant is advised to have regard to FI item no. 26 also.*
- h. Preparation of a report detailing selection of construction methodology, implementation of mitigation measures to minimise nuisance affecting adjoining properties. The Applicant is advised to have regard to FI item no. 26 also.”*

AWN have prepared the enclosed *Noise Impact Assessment* Report and Chapter 12 of the EIAR (Noise and Vibration) which responds to this Item and the relevant parts of Further Information Item No. 27. Please also see the Air Quality and Vibration section of the EIAR (Chapter 11) and the CEMP.

In respect of RFI Item 29.3(c) it should be noted that additional more comprehensive Site Investigations were carried out in preparation for this Planning Application. The additional SI confirmed (8 cores) that bedrock is at 10.5 to 14m below ground level, more than the depth of proposed basement excavations and therefore it is not anticipated that rock breaking will be required as part of the proposed works. The previous SI did not confirm bedrock at shallower levels.

30.1.4 Landscape and Visual Impact Assessment (Chapter 13)

“4. In relation to Chapter 13 of the EIAR report: Landscape and Visual, the applicant is requested to revise the assessments of the effects on Views 05, 06, 09 and 13 to ensure that they follow best practice and have due regard relevant guidelines including EPA, 2022, Institute of Environmental Management and Assessment, 2013 and Landscape Institute, 2017. The Applicant is advised to ensure all details are consistent with the requirements of Further Information Item no. 4, as detailed under the Planning Section of the Further information request.”

Chapter 13 of the EIAR has been updated by Macroworks to assess the revised Photomontages, prepared by Redline Studios (Volume 3 of the EIAR).

Additional versions of View 06 have been provided for both the summer and winter condition to show the growth of the proposed boundary planting in the short (1-7 years), medium (7-15 years) and long term (15+ years). Particular care has been taken to update the planting along this boundary to ensure that both evergreen and deciduous trees are provided and that the trees are of sufficient size when planted to provide a green boundary.

Chapter 13, Landscape and Visual was authored by Richard Barker, MLA, PG Dip (Forestry), BA (Environmental), Macroworks. He is the Principal Landscape Architect, a Corporate Member ILI with over 23 years experience in LVIA. The Assessment was carried out in the context of the above referenced documents with due regard to best practice.

We note the *Review of the EIAR* prepared by CAAS on behalf of the Planning Authority, including:

*“Section 13 of the EIAR presents an assessment of landscape and townscape effects. The work has been prepared by **appropriately experienced and expert professionals using appropriate techniques and referring to relevant and up-to-date guidelines**. The assessment is supported by reference to 19 representative and appropriate viewing points that have been **subject to photomontage simulations using methods and references that are appropriate**.”* [Our emphasis.]

There may be a different of opinion between two professionals, however Macroworks stand over the enclosed Landscape and Visual Assessment and refute the suggestion that any impacts have been underestimated in this assessment. It is also noted that the CAAS assessment of the worst case (winter) impact (pg. 24-25) appears to assess some Views as having a lesser impact than identified by Macroworks (Views 01 and 02 for example), so there can be no suggestion that efforts were made to under-estimate impacts.

The CAAS *Review of the EIAR* also states the following:

“These findings will not alter the overall conclusions that the proposed development will not be significantly visible from places public amenities beyond the site.”

and

“Landscape and Visual Impacts arising from this scheme present no obstacle to the granting of a permission.”

Chapter 13 concludes that the proposed development will not result in any Significant and Negative effects.

30.1.5 Cultural Heritage and Archaeology (Chapter 14)

“5. In relation to chapter 14 of the EIAR Report : Cultural Heritage and Archaeology, the applicant is requested to ensure that all details are consistent with the requirements of the Further information Item no. 27, as detailed above.”

Chapter 14 (Cultural Heritage and Archaeology) has been updated by IACL to reflect the *Archaeological Assessment* prepared on foot of RFI Item 28 (which is enclosed as Appendix 14.1).

30.1.6 Chapter 14 ‘Cultural Heritage and Archaeology’ and Chapter 15 Architectural Heritage’

“6. The conclusion of Chapter 14 ‘Cultural Heritage and Archaeology’ and Chapter 15 Architectural Heritage’ indicates that no predicated residual impacts upon the archaeological heritage report or cultural heritage resource were identified however, it has not been detailed how the Applicant arrived at that conclusion. Therefore the Applicant is requested to submit the rationale which informed the conclusion and clearly reference same in Chapters 14 and 15. The Applicant shall have regard to further information item’s no.4, 8, 9 and 27 in responding to this request.”

Chapter 14 states the following in respect of the predicted residual impacts upon the archaeological cultural heritage and archaeological resource, having regard to the test trenching carried out:

“There are no predicted residual impacts upon the archaeological heritage resource. This is due to the fact that no archaeological remains have been identified within the proposed development area and if any small or isolated remains are identified during the monitoring of construction works, these will be preserved either by record or in-situ. There are no predicted residual impacts upon the cultural heritage resource.”

Chapter 15 identifies residual impacts at Section 15.6.

Notably in respect of FI Items 9 and 10 the proposal to remove the chimney from the Brick Lodge has been omitted and it is confirmed that the exterior of Dalguise House will remain unpainted.

30.1.7 Soil Volumes

“7. The submitted details in respect of soil volumes as detailed within the application and associated reports are inconsistent. The volume of material to be excavated has been estimated by the project engineers (Byrne Looby) at c. 68,123m³. However these figures do not correlate with the details set out in Chapter 9 titled Lands, Soils, Geology and Hydrology of the EIAR. The Applicant is required to clarify same and submit consistent details for assessment. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters.”

The Soil Volumes were recalculated by Byrne Looby Consulting Engineers and this has informed the relevant sections of the EIAR and the CEMP. The net spoil to be removed is 48,748 sq m. The enclosed Byrne Looby Drawings provide the final spoil volumes and have informed the EIAR and CEMP:

- *Cut and Fill Plan*, Dwg No. W3683-DR-1043 Rev 01
- *Cut and Fill Section*, Dwg No. W3683-DR-1044 Rev 01.

30.1.8 Transport (Chapter 17)

“8. The Applicant is requested to revise the content of Chapter 17 of the EIAR in order to address the concerns raised by Transportation Planning and as detailed in Items 10-18 of the Further Information request. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters, also taking account of relevant revisions/ update reports/ design amendments etc made on foot of this request for further information.”

The EIAR (Chapter 17) and the associated EIAR Appendices have been updated to reflect the Further Information Request and changes made to the scheme. The issues raised in Items 11-18 are addressed separately in the Response to FI.

Since the overall change in residential quantum is insignificant (493 v. 491 units = +0.4% change), it is not necessary to rerun the traffic assessment, and therefore the TIA has not been updated. A revised version of Appendix E of the TIA (Travel Plan/Mobility Management Plan) is included with this Response to the Further Information Request.

30.1.9 Built Services (Chapter 19)

“9. The applicant is requested to revise Chapter 19 insofar as required to ensure that the chapter including all mitigation measures are fully aligned with information presented elsewhere in the EIAR and other application documents including the CEMP and the Arborist’s report, taking account of relevant revisions made on foot of other parts of this request for further information.”

The *Review of Environmental Impact Assessment Report* prepared by CAAS Ltd, dated 18 January 2023, on behalf of the Planning Authority reviewed the Chapter (except for issues relating to Surface Water and SUDs which are assessed by the Local Authority), and note:

“It is noted that service connections will avoid tree roots where trees are to be retained and that new services are to be installed by trenchless means such as jack-piping where appropriate.

The proposed mitigation measures are generally appropriate and adequate to address potential effects. Some however are not well aligned with measures provided elsewhere. For example, measure BS-1 regarding a method statement for service works ought to reference the CEMP and BS-3 regarding tree root protection and inclusion zones ought to refer to the Arborist’s survey and recommendations.

Mitigation measure BS_2: Dewatering measures will only be employed where necessary should also refer to the CEMP or Hydrogeology or Hydrology assessments to show how dewatering will be managed (also ref assessment of chapter 9 above).”

Chapter 19 of the EIAR has been updated to align with changes made at EIAR stage. The mitigation measures have also been reviewed and aligned with information presented elsewhere in the EIAR, including the CEMP and the Arborists Report.

30.1.10 Non-Technical Summary

“10. The applicant is requested to revise the Non-Technical Summary ensuring that is a summary that does not repeat whole sections of the EIAR. The revised version shall take account of revisions made foot of other parts of this request for further information, as relevant.”

The Non-Technical Summary has been revised to take account of the revisions made on foot of the other parts of the Request for Further Information. Further revisions were carried out in response to RFI Item 29.10 and the *Review of Environmental Impact Assessment Report* prepared by CAAS Ltd, dated 18 January 2023, on behalf of the Planning Authority.

The CAAS Ltd Report identifies that the *“first half (50 pages or so) of the Non-Technical Summary is largely copied from the EIAR without being summarised. This fails to follow the requirements of the legislation or have due regard to the guidelines. The second half presents summaries of the specialist chapters which generally follow the requirements.”*

The NTS has been revised to summarise the information provided in the EIAR and updated for alterations to the proposed development.

31.0 CONCLUSION

We trust that this detailed Response fully addresses the *Request for Further Information* and we look forward to a favourable decision.

The proposed development provides for a total of 493 No. dwellings consisting of 3 No. conventional houses and 490 No. Build to Rent apartments and a range of residential amenities and services across 11 No. apartment blocks ranging from 3 to 9 storeys and within the existing structures which will be restored and actively uses, including Dalguise House, two Lodges, and the Coach House.

The Scheme will also include a publicly accessible Café/Restaurant in Dalguise House, and a Childcare Facility at Block A close to the entrance to the site. Furthermore, the Scheme will provide substantial public and communal open spaces and open this site to public access.

The proposed development will introduce a new form of building tenure to the Monkstown area and will support the creation of a community within the site, which will be integrated with the surrounding area. The Scheme is designed and delivered by an operator with long experience in the sector. The Scheme will be managed by a dedicated onsite management team by and experienced operator to ensure the quality of residents' experience.

The provision of BTR is still a tenant of adopted Government policy, especially given its stated concern in the observation that "there are not enough housings to buy or rent in the private sector".

In conclusion, we contend that the development of the site, as per the enclosed plans and particulars, is fully in accordance with the proper planning and sustainable development of the area.

Please revert to us should clarification be required on any matters arising in this Response.

Yours faithfully




Tom Phillips
Managing Director
Tom Phillips + Associates

Encl.



APPENDIX A - Dún Laoghaire-Rathdown County Council's Request for Further Information Reg. Ref. LRD22A/0930, dated 26th January 2023.



Comhairle Contae County Council

Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Halla an Chontae, Dún Laoghaire, Co. Átha Cliath, Éire. A96 K6C9
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Tom Phillips & Associates

Action: *PR 21-3017*

Date R: *27 JAN 2023*

Team TP/IC/

Project Ref & Planner: *laura C*

27-Jan-2023

NOTIFICATION OF REQUEST FOR FURTHER INFORMATION
Planning & Development Act 2000, as amended

Order Number P/0164/23	Date of Order 26-Jan-2023
Register Reference LRD22A/0930	Date Received 25-Nov-2022

Applicant: GEDV Monkstown Owner Limited

Development: Large Scale Residential Development LRD permission for development on a site of c. 3.58 hectares at Dalguise House (Protected Structure RPS No. 870), Monkstown Road, Monkstown, County Dublin, A94 D7D1 (the lands include the following structures identified as Garage (A94 N3A1); Gate Lodge (aka Brick Lodge) (A94 R9T1); Dalguise Lodge (aka Entrance Lodge) (No. 71 Monkstown Rd, A94 TP46); White Lodge (A94 V6V9)); and on-street car parking in front of Nos. 6 and 7 Purbeck (A94 C586 and A94 HT99, respectively), with the provision of vehicular and pedestrian access and egress at two points on Monkstown Road: the existing entrance to Dalguise; and at Purbeck.


Alterations will be made at Purbeck including the relocation of 4 No. existing car parking spaces to facilitate the construction of a new vehicular and pedestrian bridge over the Stradbroom Stream.

The development, with a total gross floor area of approximately 46,940 sq m (including a basement of 5,230 sq m and undercroft parking of 1,344 sq m) (of which some 45,712 sq m is new build, and 1,228 sq m retained existing buildings), will consist of the construction of 491 No. residential units, consisting of 484 No. new build and 7 No. residential units (the latter within existing structures (repurposed from Dalguise House, Gate Lodge (Brick Lodge) and Coach House)).

The residential provision will comprise: 3 No. two storey 3-bed terraced houses (GFA 569 sq m), and 488 No. Build-to-Rent units (consisting of 2 No. studio units; 288 No. 1-beds; 32 No. 2-beds/3 persons; 153 No. 2-beds/4-persons; and 13 No. 3-beds) (with an option for the use of 4 No. of the BTR Units to cater for short-term stays of up to 14 days at any one time to cater inter alia for visitors and short-term visits to residents of the overall scheme) residential amenities and residential support facilities; a childcare facility; and restaurant/café.

The development will consist of: the demolition and partial demolition of existing structures (total demolition area 967 sq m, comprising: two

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residential properties (White Lodge (A94 V6V9), a 2 storey house (192 sq m); and a residential garage (A94 N3A1) and shed to the southwest of Dalguise House (285 sq m)); swimming pool extension to the southeast of Dalguise House (250 sq m); lean-to structures to the south of the walled garden (142 sq m); part-demolition of Lower Ground Floor at Dalguise House (9 sq m); single storey extension to the south of the Coach House (29 sq m) and three ancillary single-storey structures (8 sq m, 8 sq m, and 31 sq m) within the yard; potting shed (13 sq m); removal of 2 No. glasshouses; and alterations to, including the creation of 3 No. opes and the removal of a 12.4 m section of the walled garden wall to the east); the construction of: 11 No. residential blocks (identified as: Block A (total GFA 2, 015 sq m) 7 storey, comprising 19 No. apartment units (15 No. 1-beds, 4 No. 2-beds) and a childcare facility (540 sq m over Ground and First Floor Levels); Block B (total GFA 3, 695 sq m) 7 storey over undercroft car parking, comprising 48 No. apartment units (33 No. 1-beds, 6 No. 2-beds/3 persons, 9 No. 2-beds/4-persons); Block C (total GFA 3, 695 sq m) 7 storey over undercroft car parking, comprising 48 No. apartment units (33 No. 1-beds, 6 No. 2-beds/3 persons, 9 No. 2-beds/4-persons); Block D (total GFA 4, 150 sq m) 7 storey over basement level car park, comprising 50 No. apartment units (24 No. 1-beds, 26 No. 2-beds); Block E (total GFA 5, 904 sq m) 9 storey over basement level car park, comprising 66 No. apartment units (40 No. 1-beds, 26 No. 2-beds), with residents' support facilities (75 sq m) and residents' amenities (gym, yoga studio, residents' lounge/co-working space; lobby 494 sq m) at Ground Floor Level, and residents' amenities (residents' lounge; games room; screen room; private lounge; kitchen 333 sq m) with roof terrace (106 sq m) at Eighth Floor Level; Block F (total GFA 5, 469 sq m) 7 storey over basement level car park, comprising 76 No. apartment units (46 No. 1-beds, 5 No. 2-beds/3 persons, 23 No. 2-beds/4-persons, 2 No. 3-beds); Block G (total GFA 5, 469 sq m) 7 storey over basement level car park, comprising 76 No. apartment units (46 No. 1-beds, 5 No. 2-beds/3 persons, 23 No. 2-beds/4-persons, 2 No. 3-beds); Block H (total GFA 4, 252 sq m) 5 storey over Lower Ground Floor, comprising 54 No. apartment units (30 No. 1-beds, 5 No. 2-beds/3 persons, 17 No. 2-beds/4-persons, 2 No. 3-beds); Block I1 (total GFA 1, 038 sq m) 3 storey, comprising 12 No. apartment units (3 No. 1-beds, 2 No. 2-beds/3 persons, 7 No. 2-beds/4-persons); Block I2 (total GFA 1, 038 sq m) 3 storey, comprising 12 No. apartment units (3 No. 1-beds, 2 No. 2-beds/3 persons, 7 No. 2-beds/4-persons); and Block J (total GFA 1, 844 sq m) 4 storey, comprising 20 No. apartment units (13 No. 1-beds and 7 No. 3-beds)); the refurbishment, adaptation and reuse of: two storey Dalguise Lodge (Entrance Lodge) (GFA 55 sq m) comprising residential support facilities; a single storey Gate Lodge (GFA 55 sq m) comprising 1 No. 1-bed unit; and two storey Coach House and single storey Stableman's House (GFA 319 sq m) to provide 3 No. apartment units (1 No. 1-bed, 2 No. 2-bed/4 persons); the refurbishment, adaptation and change of use of Dalguise House (GFA 799 sq m) from a single residential dwelling to provide: 3 No. apartment units (2 No. studios and 1 No. 2-bed/3 person) at First Floor Level; a restaurant/cafe at Lower Ground Floor Level (GFA 273

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sq m); and residents' amenities at Ground Floor Level (library, residents' lounge, events space, bar/bookable room, 157 sq m); works to the existing structures include: removal of existing internal partitions and doors, alterations to internal layout including provision of new partitions and doors to Dalguise Lodge (Entrance Lodge); the removal of the western chimney and chimney breast, removal of existing internal partitions and doors, and alterations to internal layout including provision of new partitions and doors to Gate Lodge (Brick Lodge); replacement of existing roof, windows and doors, non-original mezzanine floor and stairs of Coach House, creation of new internal and external opes, reconstruction of chimney, construction of new stairs, provision of new internal partitions and doors, replacement of the demolished single storey structure to south of Coach House with a 42 sq m single storey extension, including construction of a link between Coach House and Stableman's House; replacement of existing roofs, windows, doors, creation of new external opes and provision of new internal partitions and doors to Stableman's House; restoration of Coach House yard walls; removal of security bars from windows, internal partitions, doors, two secondary staircases, non-original fireplaces; and the reconfiguration of internal layout including introduction of new partitions, doors and fireplaces, in-fill of former secondary staircases; removal of an existing window at rear facade of Lower Ground Level, alterations to ope and replacement with a new external door; reinstatement of external wall fabric in place of demolished lean-to at the rear facade; and removal of external door to swimming pool on eastern facade and closure of ope at Dalguise House).

The development will also consist of: the construction of a garden pavilion; the provision of balconies and terraces, communal open space including roof gardens, public open spaces, hard and soft landscaping, landscaping works including the removal of trees, alterations to boundaries; the provision of: 224 No. car parking spaces (148 No. at basement level; 20 No. at undercroft; and 56 No. at surface level); motorbike spaces; level changes; ESB Substations (at Block D and Block H); plant areas; waste storage areas; provision of cycle parking (including cargo bike spaces) at basement and surface level; and all ancillary site development works above and below ground.

Provision is made in the landscaping proposals for potential future pedestrian and cycle connections that would facilitate permeability through the site boundaries with the residential estates of Arundel and Richmond Park, respectively, and the former Cheshire Home site, subject to agreement with those parties and/or Dún Laoghaire-Rathdown County Council, as appropriate.

An Environmental Impact Assessment Report and Natura Impact Statement have been prepared in respect of proposed development. All application documentation and information is available to view online at the following website set up by the applicant www.dalguiselrd.ie.

Site of c. 3.58 hectares at Dalguise House, Monkstown Road, Monkstown, County Dublin, A94D7D1
35800

Location:

Site Area:

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App. Type: Permission LRD

Dear Sir/Madam

With reference to your planning application, received on 25-Nov-2022 in connection with the above, I wish to inform you that before the application can be considered under the Planning & Development Act 2000, as amended, **6 copies** (10 copies if a Protected Structure, within ACA or CACA) of the following **further information** must be submitted:

1. Planning

1. The applicant has not adequately demonstrated that the proposal does not result in a proliferation of BTR accommodation with an appropriate mix within the wider area and within the site, in accordance with Policy PHP28 of the current County Development Plan. In this regard the applicant is requested to provide details of all existing and permitted BTR apartments within 1km catchment of the site. The details provided should include the location, the number of apartments and unit mix.

2. The applicant has offered the future adaptability of Block I1 and I2 for later living residents. The Planning Authority refers to Section 39(2) of the Planning and development Act, 2000 (as amended) which notes the following :- 'Where permission is granted under this Part for a structure, the grant of permission may specify the purposes for which this structure may or may not be used, and in case the grant specifies use as a dwelling as a purpose for which the structure may be used, the permission may also be granted subject to condition specifying that the use as a dwelling shall be restricted to use by persons of a particular class or description and that provisions to that effect shall be embodied in an agreement under Section 47'. In this regard the applicant is requested to indicate their willingness to enter a Section 47 agreement with the Local Authority restricting the use of the apartments to persons of a particular class or description. In this regard the Applicant is also requested to give details of the particular class or description in intended residents e.g age profile.

3. The applicant has stated that Blocks H, I1 and I2 and the Coach House could be purposed as 'Build-to -Sell' units as described by the applicant. However, these Blocks and the Coach House units do not comply with the criteria set out in the Apartment Guidelines and County Development Plan 2022-2028 (Chapter 12), in respect of mix of units, open space, private amenity space, parking proposals, storage etc. The Applicant is requested to submit revised details/ drawings which clearly sets out how Blocks H, I1, I2 and the Coach House meet these standards.

4. Following detailed assessment, the planning authority have serious concerns in relation to the proposed building heights of some of the proposed blocks and it is considered in the case of Block B, C, E, and F that these are visually overbearing resulting in adverse impacts on the visual amenity of the area and residential amenities of the surrounding dwellings and on the setting of the protected structure. In order to address this, the Applicant is requested to consider revising Blocks B, C, E, and F. The Planning Authority consider that a reduction in the height of each of the proposed blocks is required in order to address the adverse visual impact of same. In the case of



Block E this may require some redesign in order to provide for a block of a high-quality architectural design. The Applicant is requested to submit updated LVIA (LANDSCAPE AND VISUAL IMPACT ASSESSMENT) in respect of any revised design proposals.

5. The private amenity area/ rear garden areas for the proposed 3 no. dwellings have not been quantified. From assessment of the submitted details, it is considered that the proposed rear amenity spaces fail to accord with Section 12.8.3.3 Private Open Space, of the County Development Plan 2022-2028. The Applicant is requested to revise same to accord with the provisions of the County Development Plan.

Housing

6. In terms of the applicants proposal in order to comply with Part V requirements the applicant is advised that the market rents quoted, while indicative, are considered excessive and any agreement based on these would not be considered the best use of resources available. The housing authority's preferred option, would be for the transfer of land. Therefore the applicant is requested to submit an alternative Part V proposal for consideration.

Parks

7. The applicant is requested to submit details of the quantum of open space provided and how the proposal in its current form meets the design standards of play provision. The applicant shall provide a full design rationale of the play and recreation opportunities for children and teenagers, as appropriate to the scale and character of proposed development. These opportunities shall be informed by the National Children's Play Policy 'Ready Steady Play' (2004) and 'Teenspace', National Recreation Policy for Young People (2007), and in accordance with departmental and local standards (Dlr CDP 2022-28 Section 12.8.9), as appropriate. The Layout Plan shall detail types of play and play area(s), target age groups, landform (included levels and contours) and boundaries, gates and planting.

8. Concerns arise in respect to the usability and functionality of these communal amenity space and public open spaces without radial sunshine. The Applicant is requested to submit a design rationale to the usability and functionality of these spaces having regard to the design modifications requested previously.

Conservation

9. The Applicant is requested to clarify that the proposed external finishes of Dalguise House, as conflicting details have been submitted on the application. The Applicant is advised that it preferable to retain the existing external appearance/ unpainted render finish in the interests of protecting the character and appearance of the protected structure.

10. The existing chimney stack to the red brick gate lodge shall be retained in order to protect the existing roofscape character and form. The removal of the chimney internally is accepted to the Planning Authority, subject to suitable bracing to ensure its retention as a dummy feature on the roofscape.



Transportation

11. The Applicant is requested to submit revised drawings and details which demonstrate the provision of accessible parking spaces which are suitable for use by people with disabilities adjacent to Blocks I & J. The drawings shall also demonstrate appropriate set-down for all residential areas adjacent to building entrances to enable drop off of users with diverse abilities. The Applicant shall also submit revised drawings and details which clearly demonstrate the provision of electric vehicle charging points in accordance with the requirements outlined in Section 12.4.11 Electrically Operated Vehicles of the current DLRCC County Development Plan 2022-2028. A minimum of one car parking space per five car parking spaces shall be shown to be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.

12. The Applicant shall submit revised drawings and details which demonstrate the required provision of proposed set-down (deliveries/work vehicles and move in/out vehicles) and car sharing car parking space locations. The drawings shall clearly demonstrate required road markings which allocate each type of space where applicable.

13. The Applicant shall submit revised drawings and details which address the following items in relation to cycle parking provision at the proposed development:

- a. Provision of an increased number of 'Sheffield' cycle parking stands in accordance with DLRCC's 'Standards for Cycle Parking and associated Cycling Facilities for New Developments'.
- b. Proposed provision and details of site-wide cycle parking, (quantity, cover, type and location) to be clearly demonstrated and detailed on standalone layout drawing.
- c. Proposed access routes to all cycle parking for both pedestrians and cyclists to be clearly demonstrated on submitted drawings.
- d. Preparation and inclusion of a Cycle Audit which demonstrates, in plan format, how all the requirements of the Council's Standards for Cycling Facilities for New Developments are met within the proposed development.
- e. Provision of quantity and type of cycle parking for Block B & C to be clearly demonstrated.
- f. Block D cycle parking appears to serve Block E, F and G also which requires some users to access from a potential distance of approximately 130m. The proposed layout relies solely on stacked cycle parking and does not adequately cater for various users and is not in accordance with DLRCC Standards. The proposed access appears to be approximately 500mm in width, and the access to the cycle parking appears to be unpaved.
- g. Location of Cargo Bike parking in basement requires too much interaction with vehicles in parking area and onerous route to surface.
- h. Block H internal cycle parking relies solely on stacked cycle parking and access to surface appears to be via lift only, which is not in accordance with the required DLRCC Standard.
- i. No cycle parking is proposed within Blocks I.
- j. Block J internal cycle parking relies solely on stacked parking.

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k. Demonstration of high-quality provision of e-bike charging and cargo bike parking across the site.

l. Demonstration of covered cycle parking for the non-residential cycle parking provision.

NOTE : Cycle parking quantity and design shall be in accordance with the DLRCC 'Standards for Cycle Parking and associated Cycling Facilities for New Developments'.

14. The Applicant is requested to submit a revised drawings which demonstrates that all items raised within the submitted Quality Audit by PMCE, dated 04th October 2022 have been adequately addressed. Further to this, the items below shall also be addressed by way of Quality Audit and revised drawings where applicable:

- a. Works are required to existing vehicular access. The proposed long straight section does not have adequate self-regulating measures. A 2metre footpath should be provided along the entire vehicular entrance and appropriate lighting should be included.
- b. Pedestrian access from Purbeck is substandard. Crossing points to provide access to desire lines and nearby destinations within the site should be provided and demonstrated. Tactile paving should be provided to facilitate use by visually impaired and people with diverse abilities.
- c. The provision of Bark Chips on pedestrian routes is not suitable and will exclude users of various abilities. Proposed 1.2m access routes should be increased to a minimum of 2m.
- d. Excessive provision of steps on pedestrian routes across the site is not in accordance with the principles of universal design or part M of the Building Regulations and will exclude users with diverse abilities. It is not acceptable to segregate users.
- e. Pedestrian Access to Block B & C requires the use of stepped pathways, or an alternative, more onerous route from the existing vehicular avenue or along the proposed grass-crete emergency access route which is not suitable for all users.
- f. Proposed cycle parking partially obstructs the pedestrian access to Block F & G.
- g. Pedestrian access to Block J includes stepped access. The alternative inclined boardwalk access from the rear of the site is noted, however, an alternative access adjacent to the main entrance should be provided.
- h. Required measures to ensure pedestrian priority and aid visually impaired users where pedestrian accesses cross proposed carriageway.
- i. The provision of steps to rear pedestrian recreational route will exclude users and is not in accordance with the principles of Universal Design.
- j. Set-down should be provided adjacent to all blocks in order to allow accessible drop off. Set down should be at or adjacent to, on accessible entrance, in accordance with Part M of the building regulations.
- k. The proposed shared road allows excessive visibility and does not include adequate self-regulating measures to function as a shared surface.
- l. Access to surface level cycle parking to the south of Block D is via adjacent steps, loose bark chips with steps, or alternative longer and more onerous route via the Dalguise house building.
- m. Set down area at Block E does not provide direct pedestrian access to Block E.
- n. Provision for impaired users on shared surface carriageway, including tactile paving, in accordance with Section 4.3.4 Pedestrianised and Shared Surfaces of DMURS.

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o. Proposed Rill water features, drop offs and Stramps may present a danger to young and visually impaired users of various abilities.

15. The Applicant shall submit a detailed road layout drawing in the form of a detailed and dimensioned site plan which clearly demonstrates road widths, surface material, signage, levels and gradients and allocation of parking spaces (set-down/delivery/residential/visitor) etc. The drawing shall also clearly demonstrate the provision of adequate self-regulating measures in order to reduce vehicle speeds across the site adequately. The layout shall be subject to the DMURS Street Design Audit to be prepared and submitted as part of the further information.

16. In accordance with Section 12.4.9 Design of Underground and Multi-Storey Car Parks of the current DLRCC County Development Plan, the Applicant shall submit drawings and details which clearly demonstrate that the proposed basement/undercroft parking meets the requirements set out in the UK's Institution of Structural Engineers booklet entitled 'Design Recommendations for Multi Storey and Underground Car Park Fourth Edition' (2011) and any subsequent updates. The following items in particular shall be clarified and addressed:

- a. Demonstration and dimensions of proposed gradients of all ramped areas.
- b. Widths and turning radii in accordance with design recommendations requirements. (Proposed left turn to basement appears to be of narrow radius and overly constricted).
- c. Separate access area for cyclists with appropriate gradients, should cycle parking be located within basement areas.
- d. Headroom clearance to be confirmed in order to allow proposed access of refuse vehicles to waste storage area.
- e. Design justification of proposed car park roundabout in lieu of STOP line.
- f. Rationale for pedestrian access from undercroft parking to Block A.
- g. All proposed Road Markings and signage to be shown on submitted drawings.

17. The Applicant is requested to submit revised vehicle movement drawings in order to demonstrate two-way vehicle access in basement and undercroft area and to adequately assess required changes. E.g., 2-way vehicular movements along basement access route.

18. The Applicant is requested to submit revised drawings and details which demonstrate the following items in relation to the submitted Travel Plan:

- a. Car sharing scheme parking locations.
- b. Written undertaking from a car sharing scheme provider to provide said scheme.
- c. Location of EV charging points.
- d. Location of proposed loading zones for each block.

19. On foot of the further information request the Applicant shall submit revised site layout drawings which clearly identify all and any areas to be taken in charge, or alternatively, to confirm that it is not envisaged that any areas will be taken in charge.

Drainage

20. The applicant is requested to submit details of the total roof area for each building, the total green roof provision for each building and total blue roof area, as well as an overall figure for the site. The green roof provision should meet the requirements as set out in the Council's Green Roof Policy, Appendix 7 of the County Development Plan 2022-2028. In addition, the extent of blue roof type structure at podium level should be identified on a drawing. A cross section of the proposed planting on the green roof shall be provided. The applicant shall also provide details of maintenance access to the green roofs and should note that, in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangements such as external mobile access that will be centrally managed. The applicant should comment on the compatibility of the green roof with PV panels if they are to be incorporated into the design.

21. Byrne Looby drawing River Crossing Sections (W3683-DR-1033) shows the emergency access road 3m above ground level. It is not clear from the drawings the drainage arrangements for this road. Landscaping drawings show there is a reinforced grass finish. The applicant is requested to clarify the drainage arrangements for this road.

22. The applicant has stated that concrete tanks shall be provided, due to the poor SI results. However, the applicant is requested to consider the use of a system that promotes infiltration (for tanks not located under buildings), which will allow some nature recharge.

23. There are no drainage plans for the access road. The applicant is requested to clarify the drainage proposals for the road. It should be noted; no surface water shall leave the site unattenuated.

24. The applicant is requested to submit a drawing showing the proposed attenuation tanks in relation to the existing flood zones (unaltered). The tanks should be located outside of the flood zone, both for the existing flood scenario and the proposed. The Drainage Impact Assessment Report notes that incidental rainfall in the basement will be directed to the attenuation tank. This should be directed to the foul network. The applicant shall update this statement and ensure the drawings correctly show the drainage going to the foul network.

25. The applicant has stated that Block A, B and C are located outside the Flood Zones in the existing scenario, with Figure 4.2 showing detail of the flood zones as well as the block locations. It appears Block B is located outside of the flood zone, however due to the scale of the figure, and no other drawing included showing these extents, it cannot be confirmed. Further information point 1 deals with this issue. The applicant is requested to submit plan drawings showing the flood extent and depth on site, as a result of a blocked culvert at the Richmond Green culvert as well as the Alma Place culvert. The applicant shall identify any mitigation measures required to deal with flooding predicted on the proposed development site. The applicant is requested to submit plan drawings showing existing and proposed flood extents to be overlaid to



show change the in-flood extents, in addition, a comparison of the change in depths should be provided on a plan drawing. Cross sectional drawings showing the revised alterations to the riverbank shall be provided at a number of locations. While overland flow routes have been identified, the analysis of blockage does not seem to be included. The applicant is requested to include the analysis and provide comment on the proposed surface water drainage system in the event of blockage or partial blockage of the system, commenting on any surcharging or flood risk that may be identified.

Public Lighting

26. The submitted Public Lighting scheme is not acceptable by reason of failure to accord with the necessary lighting standards and the tree conflicts arising within the proposed scheme. The Applicant is requested to revise same.

Construction Management

27. The Applicant is requested to submitted comprehensive documentation/ report in respect of the following:

- A Construction and Demolition Waste Management Plan, which includes (i) Materials Source and Management Planning identifying type of materials/proportion of re-use/recycled materials and future maintenance to support the implementation of Government and EU circular economy policy and (ii) Procedures to enable tracking of all waste generated to final destination
- A Construction Management Plan which includes Environmental Management and Monitoring Proposals and Complaints management Proposals.
- A Noise Planning Report, prepared by suitably qualified specialists detailing noise modelling in relation to anticipated noise levels in the completed development and design of building services in the completed development, such as heat pumps, to avoid creation of nuisance affecting adjoining residential areas. Said report should include detailing a selection of construction methodology, implementation of mitigation measures to minimise nuisance affecting adjoining properties.
- An Operational Waste Management, which sets out proposals for segregation and management of waste, including segregation and secure storage of clinical waste, within the completed development to support EU and National Policy.

Archaeology

28. The Development Applicants Unit of the Department of Housing, Local Government and Heritage do not agree with the recommends set out in Chapter 11 of the submitted Environmental Impact Assessment Report (EIAR) which recommends that all topsoil stripping associated with the proposed development be monitored by a suitably qualified archaeologist. Given the relatively large scale of the proposed development, it is possible that hitherto previously unknown archaeological features/deposits may be disturbed during the course of groundworks required for the proposed development. Therefore, in line with national policy—see Section 3.7.2 of Frameworks and Principles for the Protection of the Archaeological Heritage 1999—the Department recommends that an Archaeological Impact Assessment (including Archaeological Test Excavation) be carried out as Further Information. A report containing the results of this assessment should be submitted to the Department and to the Planning Authority prior



to any planning decision so as to facilitate the formulation of an appropriate and informed archaeological recommendation.

The Archaeological Impact Assessment shall be carried out as follows:

1. The applicant is required to engage the services of a suitably qualified Archaeologist to carry out the Archaeological Impact Assessment (AIA) which should include a programme of Archaeological Test Excavation to respond to this request for Further Information. No sub-surface work shall be undertaken in the absence of the archaeologist without his/her express consent.

2. The archaeologist shall inspect the proposed development site (PDS) and detail the historical and archaeological background of the site (consulting appropriate documentary sources) and review all cartographic sources and aerial photographs for the area.

3. The Archaeological Test Excavation must be carried out under licence from the National Monuments Service and in accordance with an approved method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application and method statement.

4. Test trenches shall be excavated at locations chosen by the archaeologist, having consulted the site drawings. Excavation is to take place to the uppermost archaeological horizons only, where they survive. Where archaeological material is shown to be present, the archaeologist shall stop works pending further advice from the Department. Please note that all features/archaeological surfaces within the test trenches are to be hand-cleaned and clearly visible for photographic purposes.

5. Having completed the work, the archaeologist shall submit a written report to the Department and to the Local Authority describing the findings of the AIA and the results of the Archaeological Test Excavation. The report shall comment on the degree to which the extent, location and levels of all proposed foundations, service trenches and other sub-surface works required for the development will affect the archaeological remains. This should be illustrated with appropriate plans, sections, etc.

6. Where archaeological material is shown to be present, further mitigation measures will be required; these may include refusal, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate. The Department will advise the Local Authority with regard to these matters. No decision should be made on this application until the Department and the Local Authority have had the opportunity to fully evaluate the findings of the AIA.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.'

EIAR

29. Following assessment of the submitted Environmental Impact Assessment Report (EIAR) it is considered that the submitted EIAR fails to adequately assess the following matters and revised information in respect of same is required.



The Applicant is advised to ensure that all details are consistent throughout the submitted reports and documents, including the EIAR. The following amendments are required:

1. Submission of an updated Construction Environmental Management Plan (CEMP) which accords with the requirements of Further Information Item no. 26 and which specifically addressed the following:

- All information shall be fully aligned with the information presented in the EIAR, including any information provided or revised on foot of this request for further information.
- All discrepancies and gaps shall be resolved including but not limited to working hours including procedures for screening and approval of out of hours working, excavation proposals, details of rock breaking, spoil quantities, groundwater management, surface water management, management of cementitious materials including locations of facilities for concrete batching, handling, washout etc, lighting controls and for construction plan for new bridge across the Stradbrook Stream.
- The revised report shall clearly set out how all construction monitoring will be carried out in accordance with the information presented in the EIAR and ly show how the monitoring will ensure that environmental effects will not exceed limits set out in the EIAR. Monitoring proposals shall include clear actions that will be put into effect in event of exceedance of trigger values or failure of mitigation measures.
- The detailed CEMP shall include clear reporting procedures that ensure adequate transparency and accessibility of compliance information for all stakeholders. It shall also include a clear programme and procedures for review and updating at appropriate intervals.

2. The applicant is requested to revise Chapter 9 of the EIAR to ensure that it:

- is based on accurate and up to date information on the project characteristics including but not limited to extent of excavations and spoil volumes;
- is aligned with information presented elsewhere in the EIAR and in the CEMP, taking account of relevant revisions made on foot of this request for further information;
- provides a compliant assessment of hydrogeological effects of the proposal; and
- provides sufficiently detailed site-specific information on proposals for management of groundwater to show how effects will be avoided or managed and monitored.

3. Submission of an updated Noise Planning report, which accords with the requirements of Item no. 26 and which also provides a

- detailed analysis of the noise impacts of the demolition and construction phases on the receiving environment should be predicted and mitigation measures proposed, especially for any potential rock braking/piling activities.
- The noise levels predicted for site activities relating to site clearance are predicted to be in the range of 76 to 82 LAeq, T at a distance of 10 meters. 82dB seems like a fairly low estimate for piling activity, especially for the area in which the proposed Blocks A, B and C are located. The 3 cable percussion boreholes in this area (BH 01, 02, 04) mentioned in The Ground Investigation Report Appendix all encountered obstruction 'Presumed rock or boulder' at depths between 2.1 and 3.7 meters, which suggests a

high likelihood that any piling activities in these areas will encounter similar obstruction which will increase the duration and noise levels. Clarification of the predicted noise levels and noise sensitive locations should be included should rock be encountered.

- Taking the above into account the possibility of a prolonged period of rock breaking should be investigated and the potential noise and vibration impacts on noise sensitive locations be predicted.
- The impact of any potential excessively noisy works on neighbouring properties shall be predicted and measures suggested for reducing the impact of such works. Including adjusting working hours and setting a trigger point noise level that if exceeded works will stop and additional noise attenuation measures implemented.
- A plan for continuous dust, noise and vibration monitoring shall be included, identifying the nearest noise sensitive locations at each boundary.
- Considering the size of the subject site a more representative baseline noise survey may be required. The survey should take measurements at various locations within the site, identifying the closest noise sensitive locations in each area. The noise survey shall include an inward noise impact assessment and consider ProPG: 'Professional Practice Guidance on Planning and Noise for new Residential Development' and BS 8233 'Guidance on Sound Insulation and Noise Reduction for Buildings'
- Preparation of a report by suitably qualified specialists detailing noise modelling in relation to anticipated noise levels in the completed development and design of building services in the completed development, such as heat pumps, to avoid creation of nuisance affecting adjoining residential areas. The Applicant is advised to have regard to FI item no. 26 also .
- Preparation of a report detailing selection of construction methodology, implementation of mitigation measures to minimise nuisance affecting adjoining properties. The Applicant is advised to have regard to FI item no. 26 also.

4. In relation to Chapter 13 of the EIAR report: Landscape and Visual, the applicant is requested to revise the assessments of the effects on Views 05, 06, 09 and 13 to ensure that they follow best practice and have due regard relevant guidelines including EPA, 2022, Institute of Environmental Management and Assessment, 2013 and Landscape Institute, 2017. The Applicant is advised to ensure all details are consistent with the requirements of Further Information Item no. 4, as detailed under the Planning Section of the Further information request.

5. In relation to chapter 14 of the EIAR Report : Cultural Heritage and Archaeology, the applicant is requested to ensure that all details are consistent with the requirements of the Further information Item no. 27, as detailed above.

6. The conclusion of Chapter 14 'Cultural Heritage and Archaeology' and Chapter 15 'Architectural Heritage' indicates that no predicated residual impacts upon the archaeological heritage report or cultural heritage resource were identified however, it has not been detailed how the Applicant arrived at that conclusion. Therefore the Applicant is requested to submit the rationale which informed the conclusion and clearly reference same in Chapters 14 and 15. The Applicant shall have regard to further information item's no.4, 8 , 9 and 27 in responding to this request.



7. The submitted details in respect of soil volumes as detailed within the application and associated reports are inconsistent. The volume of material to be excavated has been estimated by the project engineers (Byrne Looby) at c. 68, 123m³. However these figures do not correlate with the details set out in Chapter 9 titled Lands, Soils, Geology and Hydrology of the EIAR. The Applicant is required to clarify same and submit consistent details for assessment. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters.

8. The Applicant is requested to revise the content of Chapter 17 of the EIAR report, in order to address the concerns raised by Transportation Planning and as detailed in Item's 10-18 of the Further Information request. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters, also taking account of relevant revisions/ update reports/ design amendments etc made on foot of this request for further information.

9. The applicant is requested to revise Chapter 19 insofar as required to ensure that the chapter including all mitigation measures are fully aligned with information presented elsewhere in the EIAR and other application documents including the CEMP and the Arborist's report, taking account of relevant revisions made on foot of other parts of this request for further information.

10. The applicant is requested to revise the Non-Technical Summary ensuring that is a summary that does not repeat whole sections of the EIAR. The revised version shall take account of revisions made foot of other parts of this request for further information, as relevant.

The Applicants attention is drawn to the other Further Information Request items as listed in this schedule and is advised to ensure that ALL relevant chapters in the EIAR are updated, including inter alia; Chapters 7, 8, 9, 11, 12, 13, 14, 15, 17 and 18. The Applicant must ensure that all updated information is aligned with and adequately cross referenced to relevant information and assessments contained in other chapters, also taking account of relevant revisions/ update reports/ design amendments etc made on foot of this request for further information.

The applicant is advised that in order to ascertain whether it is necessary for the Further Information/Clarification of Further Information to be re-advertised by way of new public notices



(i.e. site notice & newspaper notice), **the complete Further Information/Clarification of Further Information response must, in the first instance, be lodged at the offices of the Planning Authority for viewing by the Planning Case Officer.** In the event of it being considered that new public notices are required, the applicant will be advised accordingly.

In the event that new public notices are required, a notice should be placed in an approved newspaper and a site notice should be erected on the site. A copy of these public notices should then be submitted. The Further Information/Clarification of Further Information will then be registered at **the date of receipt of the new notices by the Planning Authority.**

Please mark your reply **"FURTHER INFORMATION"** and quote the Planning Reg. Ref. No. given above.

Under Article 33 (3A) of the Planning and Development Regulations 2001 - 2022, Where in relation to an application for an LRD, a requirement under sub-articles (1) and (1A) is not complied with within the period of 2 months from the date of the request for further information under sub-article (1), or where the request relates to an environmental impact assessment or appropriate assessment or both, such additional period, not exceeding 6 months, as may be agreed by the planning authority, the LRD planning application shall be declared to be withdrawn and the planning authority shall, as soon as may be, notify the applicant that the application has been declared to be withdrawn and enter an indication that the application has been declared to be withdrawn into the register.

In accordance with Article 35 (1) (a) of the Planning and Development Regulations 2001 - 2022, if the Planning Authority considers that the Further Information received contains significant additional data, the applicant will be required to publish a notice in an approved newspaper. Any such notice must be marked "Further Information" or "Revised Plans" as appropriate, and must meet the requirements of Article 35 (1) (a) of the aforementioned regulations. The notice should state that the period in which submissions or observations in relation to the further information may be made in writing to the Planning Authority shall be not later than **two weeks** from receipt of the newspaper notice and site notice by the planning authority.

In accordance with Article 35 (2), in these instances where the applicant is required to publish a new newspaper notice, the Planning Authority also requires that the applicant erect a new Site Notice indicating that further information or revised plans are to be submitted.

Please note that, in accordance with Section 251 of the Planning and Development Act 2000, as amended, "where calculating any appropriate period or other time limit referred to in this Act or in any regulations made under this Act, **the period between the 24th Day of December and the first day of January, both days inclusive, shall be disregarded**".

Yours faithfully





Comhairle Contae County Council

Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Hálla an Chontae, Dún Laoghaire, Co. Átha Cliath, Éire-A96 K6C9
Dún Laoghaire-Rathdown County Council, County Hall, Dún Laoghaire, Co. Dublin, Ireland. A96 K6C9
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for Senior Executive Officer

PUBLIC NOTICES FOR FURTHER INFORMATION

In accordance with Article 35(1)(a) of the Planning and Development Regulations 2001 - 2012, where a Planning Authority requires an applicant to publish a notice in an approved newspaper, in relation to Further Information or Revised Plans, the notice shall contain as a heading the name of the Planning Authority marked "Further Information" or "Revised Plans", as appropriate, and shall state:-

- Name of the Applicant
- Location, townland or postal address of the land or structure to which the application relates (as may be appropriate)
- The Reference Number of the application on the register
- That significant further information or revised plans, as appropriate, in relation to the application has/have been furnished to the Planning Authority, and is/are available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy, at the offices of the Authority during its public opening hours
- That a submission or observation in relation to the further information or revised plans may be made in writing to the Planning Authority on payment of the prescribed fee not later than 2 weeks of receipt of the newspaper notice and site notice by the Planning Authority.

In the case of a planning application accompanied by an Environmental Impact Statement the period for receipt of such notices is **5** weeks.

In accordance with Article 35(2) of the aforementioned Regulations, where a Planning Authority considers that the notice published in accordance with sub-article (1)(a) and 1(b) does not adequately inform the public, the Authority may require the applicant to give such further notices in such a manner and in such terms as the Authority may specify.

Please note that the four week period for determination of the application shall run from the date of receipt of the public notices by the planning authority.



APPENDIX B - Letter from Dún Laoghaire-Rathdown County Council confirming deadline for Response for Further Information Reg. Ref. LRD22A/0930, is extended to 25th July 2023.

dlr
Comhairle Contae County Council

Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Halla an Chontae, Dún Laoghaire, Co. Átha Cliath, Éire, A96 K
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Tom Phillips + Associates
Action: JC / LAC
Date Rec'd: 27 MAR 2023
Project Ref & Planner: RR21-3617

Julie Costello
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80 Harcourt Street
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Planning Department
An Rannóg um Pleanáil
Marine Road, Dun Laoghaire, Co. Dublin
Tel: 01 205 4700

24-Mar-2023

Planning & Development Act 2000, as amended

Register Ref.: LRD22A/0930
Development: Large Scale Residential Development LRD permission for development on a site of c. 3.58 hectares at Dalguise House (Protected Structure RPS No. 870), Monkstown Road, Monkstown, County Dublin, A94 D7D1 (the lands include the following structures identified as Garage (A94 N3A1); Gate Lodge (aka Brick Lodge) (A94 R9T1); Dalguise Lodge (aka Entrance Lodge) (No. 71 Monkstown Rd, A94 TP46); White Lodge (A94 V6V9)); and on-street car parking in front of Nos. 6 and 7 Purbeck (A94 C586 and A94 HT99, respectively), with the provision of vehicular and pedestrian access and egress at two points on Monkstown Road: the existing entrance to Dalguise; and at Purbeck.

Alterations will be made at Purbeck including the relocation of 4 No. existing car parking spaces to facilitate the construction of a new vehicular and pedestrian bridge over the Stradbroom Stream.

The development, with a total gross floor area of approximately 46, 940 sq m (including a basement of 5, 230 sq m and undercroft parking of 1, 344 sq m) (of which some 45, 712 sq m is new build, and 1, 228 sq m retained existing buildings), will consist of the construction of 491 No. residential units, consisting of 484 No. new build and 7 No. residential units (the latter within existing structures (repurposed from Dalguise House, Gate Lodge (Brick Lodge) and Coach House)).

The residential provision will comprise: 3 No. two storey 3-bed terraced houses (GFA 569 sq m), and 488 No. Build-to-Rent units (consisting of 2 No. studio units; 288 No. 1-beds; 32 No. 2-beds/3 persons; 153 No. 2-beds/4-persons; and 13 No. 3-beds) (with an option for the use of 4 No. of the BTR Units to cater for short-term stays of up to 14 days at any one time to cater inter alia for visitors and short-term visits to residents of the overall scheme) residential amenities and residential support facilities; a childcare facility; and restaurant/café.

The development will consist of: the demolition and partial demolition of existing structures (total demolition area 967 sq m, comprising: two residential properties (White Lodge (A94 V6V9), a 2 storey house (192 sq m); and a residential garage (A94 N3A1) and shed to the southwest of Dalguise House (285 sq m)); swimming pool extension to the southeast of Dalguise House (250 sq m); lean-to structures to the south of the walled garden (142 sq m); part-demolition of Lower Ground Floor at Dalguise House (9 sq m); single storey extension to the south of the Coach House (29 sq m) and three ancillary single-storey structures (8 sq m, 8 sq m, and 31 sq m) within the yard; potting shed (13 sq m); removal of 2 No. glasshouses; and alterations to, including the creation of 3 No. opes and the removal of a 12.4 m section of the walled garden wall to the east); the construction of: 11 No. residential blocks (Identified as: Block A (total GFA 2,

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015 sq m) 7 storey, comprising 19 No. apartment units (15 No. 1-beds, 4 No. 2-beds) and a childcare facility (540 sq m over Ground and First Floor Levels); Block B (total GFA 3, 695 sq m) 7 storey over undercroft car parking, comprising 48 No. apartment units (33 No. 1-beds, 6 No. 2-beds/3 persons, 9 No. 2-beds/4-persons); Block C (total GFA 3, 695 sq m) 7 storey over undercroft car parking, comprising 48 No. apartment units (33 No. 1-beds, 6 No. 2-beds/3 persons, 9 No. 2-beds/4-persons); Block D (total GFA 4, 150 sq m) 7 storey over basement level car park, comprising 50 No. apartment units (24 No. 1-beds, 26 No. 2-beds); Block E (total GFA 5, 904 sq m) 9 storey over basement level car park, comprising 66 No. apartment units (40 No. 1-beds, 26 No. 2-beds), with residents' support facilities (75 sq m) and residents' amenities (gym, yoga studio, residents' lounge/co-working space; lobby 494 sq m) at Ground Floor Level, and residents' amenities (residents' lounge; games room; screen room; private lounge; kitchen 333 sq m) with roof terrace (106 sq m) at Eighth Floor Level; Block F (total GFA 5, 469 sq m) 7 storey over basement level car park, comprising 76 No. apartment units (46 No. 1-beds, 5 No. 2-beds/3 persons, 23 No. 2-beds/4-persons, 2 No. 3-beds); Block G (total GFA 5, 469 sq m) 7 storey over basement level car park, comprising 76 No. apartment units (46 No. 1-beds, 5 No. 2-beds/3 persons, 23 No. 2-beds/4-persons, 2 No. 3-beds); Block H (total GFA 4, 252 sq m) 5 storey over Lower Ground Floor, comprising 54 No. apartment units (30 No. 1-beds, 5 No. 2-beds/3 persons, 17 No. 2-beds/4-persons, 2 No. 3-beds); Block I1 (total GFA 1, 038 sq m) 3 storey, comprising 12 No. apartment units (3 No. 1-beds, 2 No. 2-beds/3 persons, 7 No. 2-beds/4-persons); Block I2 (total GFA 1, 038 sq m) 3 storey, comprising 12 No. apartment units (3 No. 1-beds, 2 No. 2-beds/3 persons, 7 No. 2-beds/4-persons); and Block J (total GFA 1, 844 sq m) 4 storey, comprising 20 No. apartment units (13 No. 1-beds and 7 No. 3-beds)); the refurbishment, adaptation and reuse of: two storey Dalguise Lodge (Entrance Lodge) (GFA 55 sq m) comprising residential support facilities; a single storey Gate Lodge (GFA 55 sq m) comprising 1 No. 1-bed unit; and two storey Coach House and single storey Stableman's House (GFA 319 sq m) to provide 3 No. apartment units (1 No. 1-bed, 2 No. 2-bed/4 persons); the refurbishment, adaptation and change of use of Dalguise House (GFA 799 sq m) from a single residential dwelling to provide: 3 No. apartment units (2 No. studios and 1 No. 2-bed/3 person) at First Floor Level; a restaurant/cafe at Lower Ground Floor Level (GFA 273 sq m); and residents' amenities at Ground Floor Level (library, residents' lounge, events space, bar/bookable room, 157 sq m); works to the existing structures include: removal of existing internal partitions and doors, alterations to internal layout including provision of new partitions and doors to Dalguise Lodge (Entrance Lodge); the removal of the western chimney and chimney breast, removal of existing internal partitions and doors, and alterations to internal layout including provision of new partitions and doors to Gate Lodge (Brick Lodge); replacement of existing roof, windows and doors, non-original mezzanine floor and stairs of Coach House, creation of new internal and external opes, reconstruction of chimney, construction of new stairs, provision of new internal partitions and doors, replacement of the demolished single storey structure to south of Coach House with a 42 sq m single storey extension, including construction of a link between Coach House and Stableman's House; replacement of existing roofs, windows, doors, creation of new external opes and provision of new internal partitions and doors to Stableman's House; restoration of Coach House yard walls; removal of security bars from windows, internal partitions, doors, two secondary staircases, non-original fireplaces; and the reconfiguration of internal layout including introduction of new partitions, doors and fireplaces, in-fill of former secondary staircases; removal of an existing window at rear facade of Lower Ground Level, alterations to ope and replacement with a new external door; reinstatement of external wall fabric in place of demolished lean-to at the rear facade; and removal of external door to swimming pool on eastern facade and closure of ope at Dalguise House).

The development will also consist of: the construction of a garden pavilion; the provision of balconies and terraces, communal open space including roof gardens, public open spaces, hard and soft landscaping, landscaping works including the removal of trees, alterations to boundaries; the provision of: 224 No. car parking spaces (148 No. at

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basement level; 20 No. at undercroft; and 56 No. at surface level); motorbike spaces; level changes; ESB Substations (at Block D and Block H); plant areas; waste storage areas; provision of cycle parking (including cargo bike spaces) at basement and surface level; and all ancillary site development works above and below ground.

Provision is made in the landscaping proposals for potential future pedestrian and cycle connections that would facilitate permeability through the site boundaries with the residential estates of Arundel and Richmond Park, respectively, and the former Cheshire Home site, subject to agreement with those parties and/or Dún Laoghaire-Rathdown County Council, as appropriate.

An Environmental Impact Assessment Report and Natura Impact Statement have been prepared in respect of proposed development. All application documentation and information is available to view online at the following website set up by the applicant www.dalguiseird.ie.

Location: Site of c. 3.58 hectares at Dalguise House, Monkstown Road, Monkstown, County Dublin, A94D7D1
Applicant: GEDV Monkstown Owner Limited
App. Type: Permission (LRD)

Dear Sir/Madam

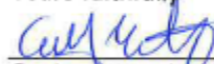
I refer to your letter of 20-Mar-2023 regarding an extension to the initial two month period in order to facilitate the submission of a response to the request for Further Information issued by the Planning Authority on 26-Jan-2023.

Please note that in accordance with Article 33(3A) of the Planning & Development Regulations 2001 (as amended), the period for submission of the Further Information for planning register reference number LRD22A/0930 has been extended by **4 months**, until **25-Jul-2023** (Decision Order number P/0504/23 refers).

It is strongly recommended that all Further Information/Clarification of Further Information be submitted before the extension of time elapses.

Please note that all Further Information/Clarification of Further Information must be submitted within this timeframe. Applicants/agents should be cognisant of the possibility of clarification of further information being requested on a further information submission. When submitting further information please allow sufficient time within the extended period to facilitate the submission and assessment of any additional information subsequently requested under Clarification of Further Information. Should you fail to comply with this request within the extended time period, the planning authority will be obliged to declare the application withdrawn.

Yours faithfully



Senior Executive Officer
Planning, Registry & Decisions Section

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