



PLANNING REPORT

DUNDRUM CENTRAL - PART 10

PROPOSED RESIDENTIAL DEVELOPMENT ON LANDS AT THE FORMER CENTRAL MENTAL HOSPITAL, DUNDRUM ROAD, DUNDRUM, DUBLIN 14



Image credit - Reddy Architecture + Urbanism

PREPARED FOR:

DÚN LAOGHAIRE RATHDOWN COUNTY COUNCIL

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1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, is instructed by Dún Laoghaire Rathdown County Council (referred to from hereon as the 'Applicant'), in partnership with The Land Development Agency (LDA), to submit this Part 10 Application to An Bord Pleanála on lands at the former Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14. Most of the Application site (the lands within the former CMH site) remains in the ownership of the Office of Public Works (OPW) and a Letter of Consent to make this Application is enclosed.

The proposed development will provide a significant and strategically important residential development, comprising 934 no. new homes, with the vast majority being cost rental units, a form of affordable housing. As well as responding to acute housing need, identified in the DLRCC's *Housing Delivery Action Plan 2022-2026*, the proposed development will provide approximately 2.9 ha of public open space which has been carefully designed to serve both the new and existing communities as well as maintaining the open character and important landscape features, unique to these former Institutional lands.

Given the former 'institutional' nature of the lands, the proposed development is subject to specific policy objectives pertaining to institutional lands. This includes (*inter alia*) a requirement to produce a Masterplan and retain the open character of the lands whilst providing a minimum of 25% open space. A Masterplan for the landholding is also required under the provisions of the *Dundrum Local Area Plan, 2023* (DLAP).

In this regard, the redevelopment of the application site is supported by a comprehensive Masterplan which provides for approximately 1,002 no. residential units and fully accounts for the provisions of the Institutional policy objective attached to the lands and objectives of the DLAP. The Masterplan was initially developed by a multidisciplinary project team, in consultation with the public and Dún Laoghaire Rathdown County Council for inclusion in a previous Planning Application made in respect of the subject site in 2022. It has subsequently been updated in 2024 to reflect the evolving design and DLAP requirements.

This Part 10 Application submitted by Dún Laoghaire Rathdown County Council in partnership with the LDA forms part of a Masterplan for the wider former Central Mental Hospital site area of 11.39 ha.

In addition to the development described in this Report, the site wide Masterplan provides for the adaptive re-use of the main hospital building and development of the immediately adjoining lands. A future planning application will be made in respect of the aforementioned adaptive re-use, design development is ongoing in this regard. See Figure 1.1 which illustrates the planning application boundary for the proposed Part 10 scheme.

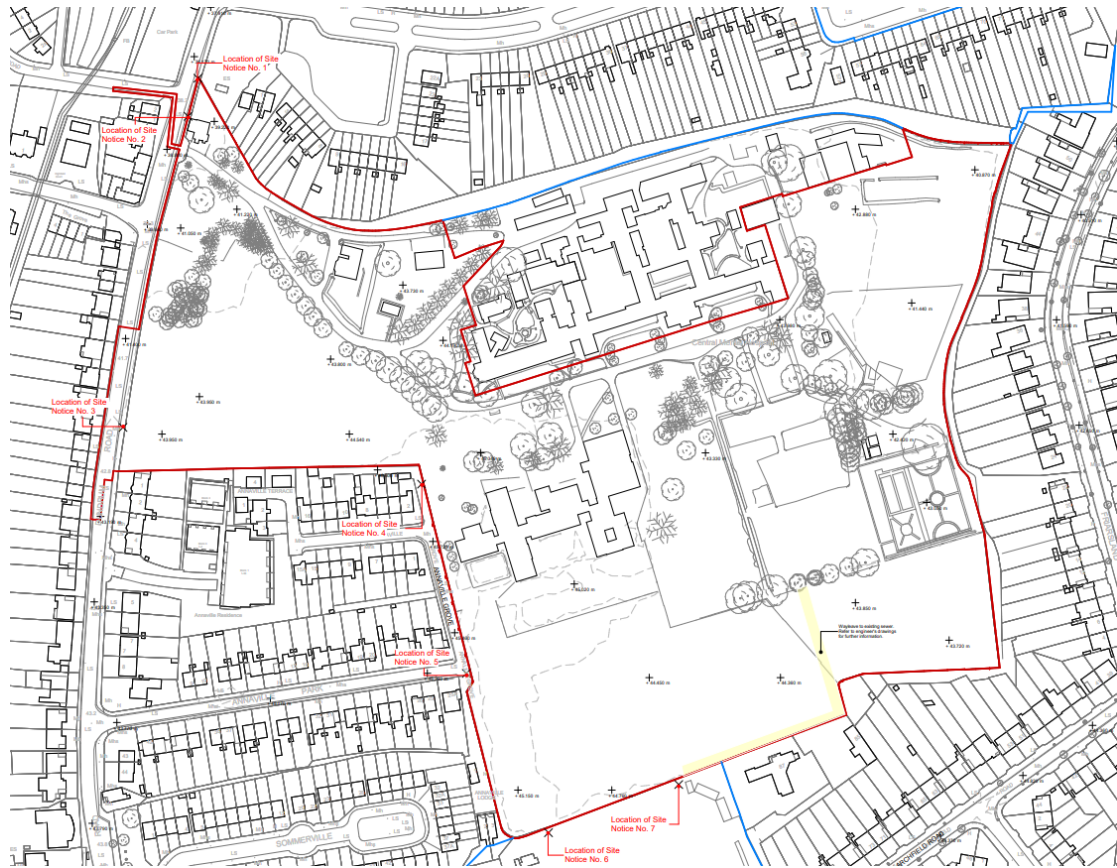


Figure 1.1: Extract from the Site Location Plan, prepared by Reddy A+U. (Source: RAU Dwg No. DCD-02-SW-ZZZ-DR-RAU-1000, Rev P3 S-1.)



1.1 Rationale for Development and Vision for the former Central Mental Hospital Lands

Dún Laoghaire Rathdown County Council has a remit and strong commitment to providing new homes and housing supports for people who are unable to meet their accommodation needs through their own means. Dún Laoghaire Rathdown County Council intends to deliver social homes through direct build, turnkey developments, Part V and through working in partnership with Approved Housing Bodies (AHBs) and the Land Development Agency (LDA).

The Land Development Agency is making a significant positive contribution towards enabling an affordable housing sector in Ireland. As part of this, the LDA is working towards providing new homes and making them available to individuals and families through the schemes provided by the enactment of the *Affordable Housing Act 2021 (as amended)*. Further detail surrounding the function of the LDA is contained within Section 14 of the *Land Development Agency Act 2021*.

Dún Laoghaire Rathdown County Council and the LDA both have a remit to deliver housing and have formed a partnership to jointly deliver the former CMH site in Dundrum. The development will form a leading example of sustainable living which delivers a mix of tenures and unit types where people of all ages can live, whilst retaining and celebrating the site's historic assets and providing an outstanding destination for leisure with distinctive and diverse public spaces. The development will realise compact growth which promotes modal shift towards healthy, active and sustainable mobility.

1.2 Recent Planning History

An SHD Application was submitted to An Bord Pleanála (ABP Ref. ABP-313176-22) by the LDA in March 2022. The development was for a 10 year permission for 977 No. residential units (957 no. apartments and 20 no. houses) and commercial facilities including retail, restaurant, medical centre, café, childcare facility and a community centre.

That Application was made under the SHD process under the previous *Dún Laoghaire Rathdown County Development Plan 2016-2022*, and the determination was made under the current Development Plan 2022-2028.

An Bord Pleanála permitted the development in May 2023 with a number of Conditions, including a Condition which altered the unit mix by requiring the amalgamation of smaller units to form larger units, thus reducing the permitted number of units to 852 No in total.

The permission also restricted the existing vehicular entrance to emergency vehicles only, in addition to cyclist and pedestrian entrance, with all other traffic to utilise the new entrance from Dundrum Road.

The permission is currently the subject of a Judicial Review, which at the time of writing had not been determined.



1.2.1 Proposed Development in Context of Recent Planning History

The main principles of the permitted development have been retained, the purpose of the new application is to better meet the housing needs of the County and to deliver new homes as quickly as possible.

The ABP assessment and Order in respect of the previous SHD Application, and the alterations required resulting from the associated Conditions, were considered in detail in making this Application.

Furthermore, in the intervening period, the LDA has developed more detailed design guidance and its Sustainability Strategy to inform LDA developments in order to develop sustainable communities.

Consequently, the LDA decided to seek a new planning permission under the Large-Scale Residential Development process for an updated residential development, which reflected the revised internal guidance and learnings from other large projects across the country, and the extant permission for the site.

The LDA commenced engagement with Dún Laoghaire Rathdown County Council in respect of the proposed LRD Application. The LDA also engaged with the Housing Department of Dún Laoghaire Rathdown County Council in respect of the social housing provision at the site.

Ultimately, it was agreed between Dún Laoghaire Rathdown County Council and the LDA that in the interests of meeting the housing needs of the County a greater proportion of the proposed units will be delivered as social homes (now 181 No. or 19% of the total), with the remaining 81% of units to be affordable housing. It was on this basis that DLRCC and the LDA decided that the Application would be a partnership arrangement between Dún Laoghaire Rathdown County Council and the LDA, and the Application is consequently made via the Part 10 process.

Dún Laoghaire Rathdown County Council and LDA have closely engaged through the design process to ensure the quality of the proposed development in respect of *inter alia* the unit mix, unit tenure, design of the proposed development including the landscaping, biodiversity, lighting, transport, community facilities, and conservation.

Whilst the scheme proposed via this Part 10 Application is informed by the site's recent planning history and the overarching principles of the proposed scheme are the same, it is an entirely separate Application which stands alone from the previous permission. The new application is designed to fulfil the housing need identified by Dún Laoghaire Rathdown County Council in the *Housing Delivery Action Plan 2022-2026*, which identifies a need for both social and affordable housing. The provision of a 100% affordable and social housing development comprising of 934 No. dwellings will go towards meeting the demand identified.



1.3 Development Strategy

A Masterplan 2024 for the entirety of the former CMH lands has been prepared, which builds on and updates the previous Masterplan submitted with the SHD Application in 2022.

The development strategy for the delivery of the Masterplan for the entire landholding comprises a dual application approach, comprising:

- i) a Part 10 Application to An Bord Pleanála (this application); and*
- ii) a future planning application in respect of the remainder of the CMH lands.*

Both planning application proposals have been designed to 'standalone' to enable independent assessment and implementation, although the overall Masterplan ensures that site wide infrastructure (such as piped services, public open space provision, pedestrian, cyclist and vehicular routes) has been designed to ensure the functionality of the overall Masterplan lands. The Applications will be submitted in a consecutive fashion with the submission of the future planning application to follow the determination of this Part 10 Application. See Section 3.3.1 of this Report for more detail about the future application for the remainder of the site including the adaptive re-use of the main hospital building and development of the immediately adjoining lands.

The Masterplan provides a comprehensive plan for the entire landholding and underpins the two planning applications.

Importantly, the development strategy prioritises the delivery of a significant number of homes, in line with the specific remit of Dún Laoghaire Rathdown County Council to deliver social housing and the LDA remit to provide new homes and make them available to individuals and families through the schemes provided by the enactment of the *Affordable Housing Act 2021*.

The proposed development strategy is further rationalised and contextualised below.

1.3.1 Rationale and Context for Development Strategy

The application site's Institutional/INST Objective designation and the associated policy requirements contained within the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, requires the preparation of a Masterplan for the lands. The *Dundrum Local Area Plan 2023* (DLAP) also requires the preparation of a Masterplan for the former CMH lands.

The enclosed Masterplan for the former Central Mental Hospital lands provides a comprehensive proposal for these lands in their entirety.

The Masterplan proposal was initially developed over a 12-18 month period prior to the lodgement of a SHD Application for the current Application site in March 2022. It was subject to a detailed consultation process with the public and Dún Laoghaire-Rathdown County Council (DLRCC) in line with the then Development Plan requirements and the LDA's responsibilities as a state body, as well as An Bord Pleanála under the SHD process.

The Masterplan has been subject to revision in parallel with the preparation of this Application considering the requirements of the DLAP and the current Development Plan, both of which came into effect after the 2022 iteration of the Masterplan. We note that the Masterplan is non-statutory and does not set the framework for any development consent nor has it, or will it, be adopted by DLRCC.

The development strategy for the former Central Mental Hospital lands is underpinned by the Masterplan proposal which provides a detailed framework for planning application proposals at the site.

As noted briefly above, the particular development strategy for the delivery of the Masterplan comprises the lodgement of a Part 10 Application for the main residential element of the Masterplan (this planning application) which will be considered by An Bord Pleanála under the Part 10 provisions, and a future planning application relating to the adaptive re-use of the existing buildings and some further residential development. This is shown by the illustrative Development Strategy Plan below.



Figure 1.2: Image depicting the Development Strategy, showing the Part 10 redline boundary vs the remaining part of the former CMH site that will be subject to a future planning application. (Source: Reddy A+U, 2024.).



It is further noteworthy that the *Environmental Impact Assessment Report* (EIAR), which accompanies this Part 10 Application, includes detailed cumulative impact assessment of the Part 10 proposal and the future planning application. This recognises the close relationship between the two planning application proposals and ensures full environmental assessment of all cumulative impacts should both developments be implemented, as planned.

The development strategy is largely influenced by the importance of identifying a long-term secure use and the complexities of adapting a building of the significance of the Main Hospital Building. The internal form of the Main Hospital Building (which forms an important component in realising the sustainable development of the lands) reflects its historical use as a high security mental health facility, which, paired with the sensitivity of the building fabric from a built heritage perspective, results in some constraints surrounding the future use of the building.

The Masterplan proposal for the main hospital building reflects this; the proposed enterprise centre use is considered to be an appropriate use of the building, giving consideration to existing internal layout and the extent of interventions required to achieve residential conversion. There is ongoing work associated with preparing an application for a Protected Structure of the scale of the Main Hospital Building with ongoing survey work being undertaken. Therefore, it was decided that the proposed adaptive reuse of the structure and associated buildings would be subject to a separate planning application.

The preparation and submission of the planning applications was also constrained by the use of the Central Mental Hospital complex by the HSE and associated service users, which ceased at the end of 2022. This resulted in restricted access to the main hospital building for the detailed survey work that is required to support an application for the adaptive re-use of the building. That work and detailed engagement with the DLRC Conservation and Planning Departments is ongoing.

Further to this, the Masterplan proposal includes a quantum of residential development to the rear of the Main Hospital Building which would be included within the future planning application proposal. This recognises the integral relationship between this particular area of residential development and the Main Hospital Building and the potential complexities from an assessment perspective should it form part of Part 10 proposal.

We therefore confirm that the two applications will be submitted consecutively, with the submission of the future planning application following the determination of this Part 10 application. Under this development strategy, the Part 10 proposal will be determined by the Board, before the future planning application for the remainder of the site is submitted. This will enable a clear planning baseline for the purposes of the assessment of the future application; the latter application will have the benefit of review of the Part 10 approval and its related assessment and can ensure any issues arising can be addressed in full.

This development strategy also prioritises the Part 10 and delivery of a significant number of new homes in line with the remits of both the DLRC and the LDA.

In conclusion, the proposed development strategy is underpinned by a detailed Masterplan proposal which facilitates the realisation of the vision for the overall Central Mental Hospital lands. The Masterplan reflects the DLAP, which notes that the Planning Authority was broadly satisfied with the previous version of the Masterplan design approach, but suggested

tweaking of heights to increase the height of centrally located blocks which run north south and lowering of the southern perimeter blocks that run east west. Some alterations to heights have been incorporated into the proposed development and the current Masterplan.

The dual planning application approach responds to, the remits of both DLRCC and the LDA to deliver a significant number of social and affordable homes. This approach allows the majority of the proposed housing to be delivered quickly, whilst ensuring the appropriate time is available to develop a final proposal for the historic buildings that are to be retained and identify appropriate occupants.

We also confirm that DLRCC and the LDA are fully committed to the delivery of the adaptive re-use of the Main Hospital Building and consider it to form an integral part of the vision for the overall wider landholding. To mitigate complexities surrounding assessment and delivery, each application proposal has been carefully designed to stand alone from both an assessment and delivery perspective but equally, will be seamlessly deliverable in tandem.

1.3.2 Application for 10 no. Year Planning Permission

Due to the length of the construction programme, arising from the scale of the proposed development, it is considered prudent to apply for a 10 year planning permission to facilitate the required period of construction.

Refer to the enclosed *Construction and Environmental Management Plan*, prepared by Barrett Mahony Consulting Engineers.

1.4 Summary of Proposed Development

Table 1.1: Key Development Statistics:

Development Statistic	Part 10 Application
Site Area	9.7 ha (includes 0.1 ha outside of former CMH site)
No. of Residential Units	934 no. units
Total Gross Floor Area	c. 94,058 sq m (c. 93,980 sq m excluding retained existing buildings)
Non-Residential Floorspace	4,380 sq m
Demolition of Certain Existing Structures	3,677 sq m
Gross Residential Density	97 units p/h (based on 9.6 ha site, which excludes the 0.1 ha of public road outside the former CMH site which is included in the Application site)
Net Residential Density	146 units p/h (based on a net site area of 6.7 ha excluding the public open space and Gate Lodge, and a portion of the site for the other non-residential uses, as per the methodology in the <i>Compact Settlement Guidelines 2024</i>)
Plot Ratio	0.98 (based on a 9.6 ha area, i.e. excluding the 0.1 ha outside the main former CMH site)
Site Coverage	30% (based on a 9.6 ha area, i.e. excluding the 0.1 ha outside the main former CMH site)

Height	2 – 8 storeys (including Lower Ground Floors at Block 02 and 10) over Basement Levels at Blocks 03 and 04.)
Car Parking	524 no. spaces (466 no. residential spaces, (including 57 no. visitor spaces and 12 no. Car Share spaces) (c. 0.5 spaces per unit), and 58 no. non-residential)
Motorbike Parking	79 no. Motorbike Spaces (57 no. residential spaces and 22 no. spaces).
Public Open Space	2.9 ha

1.5 Project Team

This submission was prepared on behalf of DLRC and the Land Development Agency by the following expert team:

Table 1.2: Key Consultants of Project Team:

Discipline	Consultant
Project Lead/ Lead Architect	Reddy Architecture + Urbanism
Masterplanner	Tyréns UK
Town Planning Consultant	Tom Phillips + Associates
Engineer	Barrett Mahony Consulting Engineers
Transport Consultant	ILTP
Heritage Consultant	Alastair Coey Architects
Landscape Architect	Aecom
Ecologist	Altamar Ltd.
Ornithologist	Altamar Ltd., Flynn Furney Environmental Consultants and MKO.
Mammal Ecologist	Ecological Solutions, Dr Chris Smal
Daylight and Sunlight Consultant	GIA
Townscape and Visual Impact	Macroworks
Archaeologist	IAC
Noise Consultant	AWN
Waste Consultant	AWN
Air Quality Consultant	AWN
Wind Consultant	GIA
Quantity Surveyor	AECOM

1.6 Purpose of this Report

This Planning Report should be read in conjunction with the enclosed *Statement of Consistency including Dundrum LAP Statement of Consistency*, prepared by Tom Phillips + Associates, which outlines the overall compliance of the proposed development with national, regional and local planning policy. This Report sets out an overview of the proposed development, the site context from a locational, planning and environmental context and any relevant planning history.



For full details on the design and the design quality of the proposed development, refer to the enclosed *Architectural Design Report*, prepared by Reddy Architecture and Urbanism and the *Landscape Design Report*, prepared by Aecom. The design quality and standard of accommodation proposed by the residential component of the scheme is detailed in the *Housing Quality Assessment Report (HQA)*, prepared by Reddy Architecture and Urbanism.

For site wide context, refer to the enclosed *Masterplan* document, prepared by Reddy Architecture + Urbanism in conjunction with Tyréns UK.

2.0 SITE AND PLANNING CONTEXT

2.1 Site Location

The application site primarily comprises the former Central Mental Hospital lands in Dundrum, Dublin 14. The former Central Mental Hospital lands are in the ownership of the OPW and will be transferred to The Land Development Agency in due course.



Figure 2.1: Aerial image of the entire Central Mental Hospital site of approx. 11.3 ha (i.e. the Masterplan lands), shown in the context of surrounding existing development (annotated by Reddy Urbanism and Architecture).

The application site is 9.7 ha in area, 9.6 ha of which is the former Hospital lands, which are bound by a 4-5 m perimeter wall and is accessed via an entrance off Dundrum Road, 0.1 ha of the site comprises a sections of Dundrum Road and St Columbanus Road which are included in the site area in order to provide for alterations to a junction and new piped services.

The overall former CMH site measures 11.3 ha and accommodates a number of existing buildings including the Main Hospital Building, the Chapel, the Infirmary and a number of associated buildings and small temporary structures. The site also consists of a number of landscape features such as a walled garden, an orchard and mature trees.

The site includes a number of Protected Structures, namely the Asylum (RPS No. 2072), Hospital Building (RPS No. 2071), and Catholic Chapel (RPS No. 2073). In terms of landscape features, the walled garden and the vast majority of mature trees and the orchard are within the Part 10 site along with the boundary wall, with the exception of the stretch behind the Main Hospital Building.

In terms of surrounding development, the site is bound by residential properties and gardens at Mulvey Park to the north, at Friarsland Road to the east, at Larchfield Road to the south and south east and at Annville Grove, Annville Park and Annville Terrace to the west. The

surrounding residential properties are generally one or two storeys in scale with a four storey apartment block located close to the site boundary near Annville Grove. In addition to the residential properties referred to above, part of the sites southernmost boundary abuts Rosemount Green, a Dún Laoghaire-Rathdown County Council (DLRCC) public open space and football pitch.

The site is well served by existing public transport infrastructure; the nearest Luas Green line stop is located approximately 450m west of the site at Windy Arbour. Dublin Bus network infrastructure includes stops at Dundrum Road (R117), Bird Avenue, Goatstown Road (R825), Churchtown Road and Taney Road (both R112).

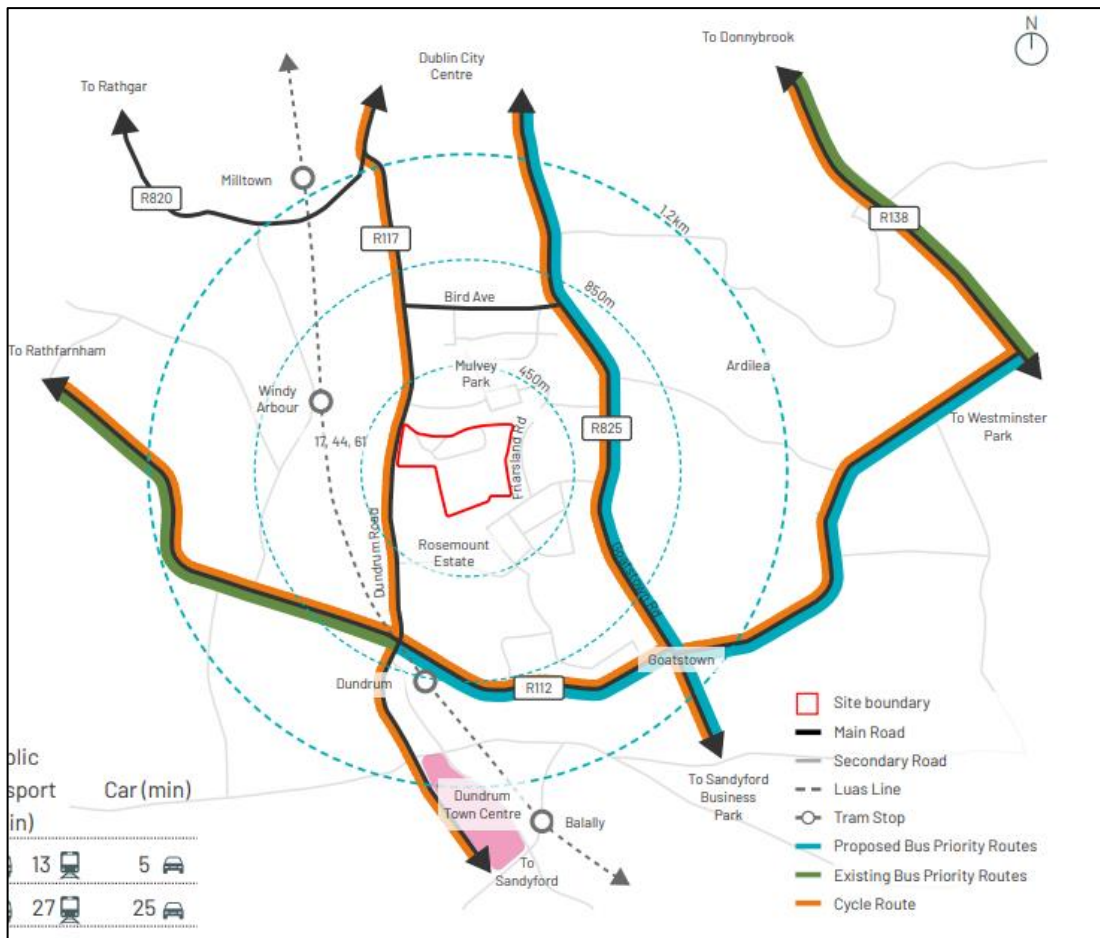


Figure 2.2: Extract from the *Masterplan* document showing wider site context, including transport connectivity.



Figure 2.3: Regional Map, Extract from the Masterplan.

2.2 Characteristics of the Part 10 Lands

As set out above, this planning application relates to the lands associated with the Part 10 component of the site-wide Masterplan only.

The majority of the existing site buildings that would be considered to have most heritage value are located outside of the application red line boundary, with exception of the Gate Lodge, located close to the existing site entrance. Other existing buildings which are proposed for demolition are included within the red line boundary and comprise the following:

- Former swimming pool / sports hall and admissions unit;
- Two storey redbrick building;
- Temporary structures including single storey portacabins, sheds, greenhouses etc.

The perimeter wall, which is 4-5 m in height is also included within the red line with exception to the stretch of wall located to the rear of the Main Hospital Building.

In terms of landscape features, the existing walled garden, the vast majority of mature trees and the orchard are within the Part 10 Application site.



Figure 2.4: Aerial Imagery of the subject site and surrounds; approximate Part 10 site boundary shown in red.

2.3 Wider Environment of Subject Site

The wider environs of the site are predominantly characterised by low scale residential. However, there are a number of commercial uses within close proximity.

This includes Dundrum Town Centre (and Shopping Centre), approx. 1.6 km to the south of the application site entrance. From the site, Dundrum Town Centre is reachable in 20 minutes by foot, 6 minutes by bike and 7 minutes by bus.

Dundrum Business Park is located approximately 200m to the north of the site which comprises a number of office blocks and associated car parking.

Dublin City Centre is located approximately 7.2 km from the application site and accessible by both Luas (27 minutes) and bus (22 minutes).

There are a number of schools in close proximity, namely, Our Lady's National School, Jesus and Mary College, Our Lady's Grove and Our Lady's Grove Primary School, Goatstown Educate Together Secondary School, and Goatstown Educate Together National School (at the former Notre Dame school site, until permanent accommodation is provided at the site of the Goatstown ETSS). University College Dublin (UCD) is located within c. 1 km (as the crow flies) to the northeast of the application site.



In terms of retail provision, as noted above, the proposed development site is located c. 1km north of Dundrum Town Centre, which is identified as a 'Level 2 – Major Town Centre' within the Retail Hierarchy for the Greater Dublin Area (GDA) set out in the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*.

2.4 Masterplan Context

The Part 10 proposal is underpinned by a site wide Masterplan, prepared in line with the Development Plan policy requirement arising from the site's Institutional Lands designation and to ensure the comprehensive redevelopment of the 11.3 ha former CMH lands, and as per the DLAP policy. The Masterplan itself does not set the framework for any development consent nor has it, or will it, be adopted by the Planning Authority.

The Masterplan provides for approximately 1,002 no. residential units and the adaptive reuse of the older structures on site, and forms the basis of the high-quality and sustainable redevelopment of the subject lands and conveys the development vision for the lands embedded within urban design principles for density and sustainable design. It provides a firm basis for the development of an accessible, permeable and environmentally sustainable neighbourhood. It takes into consideration the site's unique location and heritage while balancing considerations of affordability, environmental sustainability, development standards and safety, mobility, conservation and placemaking.

As part of this, and in line with the aforementioned requirements arising from the Institutional nature of the lands and the DLAP, the Masterplan retains the open character of the lands and provides a significant quantum of high-quality open space which incorporates a number of important landscape features unique to the former Central Mental Hospital lands.

Furthermore, the Masterplan underpins the dual planning application approach discussed in detail in the Introduction, with the proposed Part 10 development forming a key delivery mechanism for the redevelopment of the lands by DLRCC in partnership with the LDA.

A Masterplan for the lands was initially developed in 2022 in consultation with DLRCC and was subject to a public consultation process with the community and local stakeholders. It evolved further in 2024 to reflect the DLAP, the current Development Plan, and the site's planning history, in addition to further engagement between DLRCC and the LDA.

The masterplanning of the site has therefore been an ongoing process over a number of years and has adapted to site specific complexities, with a number of interactions between constraints which have resulted in amendments to the Masterplan itself.

Whilst the current Masterplan does not vary significantly from previous version of the Masterplan submitted with the 2022 SHD Application, in our view, the current Masterplan results in a site-wide proposal that optimises the development potential of the lands whilst balancing various challenges surrounding site and delivery constraints.

Refer to the *Masterplan Report* for full details.



Figure 2.5: Illustrative masterplan for the Central Mental Hospital lands, prepared by Reddy A+U.

2.5 Environmental Context

Environmental Impact Assessment

In accordance with the EIA Directive 2011/92/EU (as amended), the *Planning and Development Act 2000 (as amended)* and the *Planning and Development Regulations 2001 (as amended)*, this Part 10 application is supported by an *Environmental Impact Assessment Report (EIAR)*.

As set out within the introductory chapters of the enclosed EIAR, Schedule 5 (Part 2) of the *Planning & Development Regulations 2001 (as amended)* sets mandatory thresholds for each project class for which EIA is required. Sub-sections 10(b)(i) and 10(b)(iv) address ‘*infrastructure projects*’ and refer to housing and urban developments. We set out the basis upon which an EIAR for this project is required below.

Subsection 10(b)(i):

“Construction of more than 500 dwelling units”

This Project comprises a Part 10 Application including 934 no. residential units and c. 4,380 sq m of other (non-residential) uses. The Project exceeds this threshold and therefore an EIA is required in the context of this Class of the Regulations.



Subsection 10(b)(iv):

“Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere”

(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)”

The Part 10 Application relates to a site of c. 9.7 ha and is located within an area which comes within the definition of “*other parts of a built-up area*”. The Project therefore does not exceed the threshold of 10 hectares, with respect to site area of the proposed development, however it is noted that the overall former Central Mental Lands (to which the Masterplan relates) are 11.3 ha in area. Regardless, an EIAR is already triggered in respect of 10(b)(i).

Importantly, especially given the development strategy that underpins this proposed Part 10, we confirm that the enclosed EIAR includes a detailed and robust cumulative impact assessment which has regard to the impact of the proposed Part 10 in combination with applicable surrounding committed and planned projects. This includes the future application for the remainder of the former CMH lands. The other development projects considered relevant for cumulative impact assessment were identified in line with methodology which is explained in detail in Chapter 23 of the EIAR.

In respect of the planned projects identified, we further note that planning permission may have been granted in relation to any of the below planned/ undetermined schemes at the point at which An Bord Pleanála assess the proposed development. We do however note that the Board will therefore be in a position to take account of such projects as part of its assessment process, assisted by the assessment provided within the EIAR in respect of these projects.

Appropriate Assessment

In addition, this planning application submission is accompanied by a *Natura Impact Statement* (NIS), prepared by Altemar Ltd., which supports the Appropriate Assessment Process in line with the EU Birds and Habitats Directives.

Ecological Surveys

Furthermore, we confirm that extensive ecology survey work has been undertaken to support this application, providing a strong basis for the assessment undertaken in respect of the Biodiversity Chapter of the EIAR and the NIS. We confirm that the following surveys have been undertaken:



Table 2.1: summary of the ecology surveys undertaken in respect of the proposed development.

Survey	Surveyor	Date
Habitat	Bryan Deegan (MCIEEM)	13th August 2020, 21st August 2020 & 10th August 2021 and 14th June 2023
Habitat	Emma Peters	14th May 2024
Flora	Bryan Deegan (MCIEEM)	13th August 2020, 15th September 2021, 10th August 2021 & 12th October 2021, 14th June 2023 and 14th May 2024
Flora	Emma Peters	14th May 2024
Bat Surveys (inspections, static detector and emergent)	Bryan Deegan (MCIEEM)	13th August 2020 & 21st August 2020 10th August 2021 & 12th October 2021
Bat Surveys (detector and emergent)	Bryan Deegan (MCIEEM) Emma Peters Frank Spellman Gayle O'Farrell	25th May 2023, 13th June 2023 and 28th May 2024, 28th May 2024, 1st February 2024 (internal) 8th July 2024
Mammal	Bryan Deegan (MCIEEM)	23rd February 2021, 3rd April 2023, 4 surveys between 1st February 2024 and 16th April 2024
Mammal	Dr Chris Smal	22nd of July 2024
Breeding Bird 2023	Frank Spellman	7th, 14th and 30th June 2023
Breeding Bird 2024	Frank Spellman	3 surveys between 23rd April and 7th June 2024
Wintering Bird 2020/2021	Kathryn Sheridan and Donnacha Woods	12 surveys from September 2020 to the March 2021.
Wintering Bird 2021/2022	Billy Flynn and Eric Dempsey	7 surveys between 24th November 2021 and 28th February 2022.
Wintering Bird 2023/2024	Eric Dempsey	10 surveys between 14th November 2023 and 15th March 2024

Flood Risk

The site features a gradual slope downwards from the southwest corner towards the northeast corner, and from the western portion of the site downwards to the Dundrum Road entrance. The site also features 2 no. natural catchment areas.

The subject site is in Flood Zone C, which describes a site “where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1,000 for both river and coastal flooding”.

The proposed development falls under the OPW classification of Highly Vulnerable Development due to the presence of residential units across the site, but is situated in Flood Zone C which is at the lowest flood risk level and therefore is an appropriate site for Highly Vulnerable Development.

A *Site-Specific Flood Risk Assessment*, prepared by Barratt Mahony Consulting Engineers, is enclosed with the application.



2.6 Strategic Planning Context

As set out in detail in the *Statement of Consistency including Dundrum LAP Statement of Consistency*, there is a full suite of national and regional planning policy and guidelines which supports the proposal of a significant quantum of housing in the context of achieving higher density development, increased building height and compact growth.

Alignment of the proposed development with the relevant national and regional policy objectives is set out in the enclosed *Statement of Consistency including Dundrum LAP Statement of Consistency*. It confirms that as a brownfield, publicly owned, well-located site in an existing urban area, this application site and the development proposed has the potential to significantly contribute to national policy objectives surrounding compact growth.

In terms of the local policy context, the subject lands benefit from a residential land zoning under the provisions of the *Dún Laoghaire-Rathdown Development Plan 2022-2028* - the specific zoning 'Objective A' is "To provide residential development and improve residential amenity while protecting the existing residential amenities". As well as residential development being 'permitted in principle', Assisted Living Accommodation is also 'permitted in principle' and we confirm that the proposed non-residential uses are 'permitted in principle' and 'open for consideration' under this zoning objective. The non-residential uses proposed as part of the development include: Community ('Community Facility'), Childcare facility ('Childcare Service'), Medical ('Health Centre/Healthcare Facility) these uses are Permitted in Principle under the zoning objective. They also include Retail ('Shop Neighbourhood'), Restaurant ('Restaurant') (including the proposed café in the Gate Lodge), Management Suite (Office less than 200 sq m), each of these uses are 'Open for Consideration' under the zoning objective. We note that the *Community Facility; Childcare Service; and Health Centre/Healthcare Facility* uses are subject to caveat (a) "Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities'. In this regard we note these uses have been designed in the context of the wider residential development to ensure no undue impact arises. The proposed Management Suite will be less than 200 sq m and thus complies with the 'Office less than 200 sq m' provision.

Furthermore, the application site is subject to the INST objective, arising from the Institutional nature of the lands. This attracts specific Development Plan policy requirements which are provided for as part of the proposed development, including (*inter alia*) a requirement to produce a Masterplan and retain the open character of the lands whilst providing a minimum of 25% open space. A Masterplan for the landholding is also required under the provisions of the *Dundrum Local Area Plan, 2023* (DLAP). The enclosed Masterplan outlines that the proposed development of the lands was designed to retain the open character of the lands and the existing features of interest such as trees and the historic structures. These considerations are referred to in greater depth in the *Statement of Consistency including Dundrum LAP Statement of Consistency*.

The enclosed *Statement of Consistency including Dundrum LAP Statement of Consistency* also details the compliance of the proposed development with *Dún Laoghaire-Rathdown Development Plan 2022-2028*. At a strategic level, we note that the Core Strategy of the Development Plan, on the basis of projected housing demand, supports the overall delivery of 24,007 new homes during the Plan period. We therefore highlight that the proposed



development, which seeks to deliver 934 no. new residential units on serviced well connected land, would make a significant contribution towards housing delivery in Dún Laoghaire-Rathdown.

From a strategic standpoint, we note that the site is identified in the Development Plan as a 'Strategic Regeneration Site'; such sites have been identified in recognition of their potential role in increasing the efficiency of urban land-use and delivering compact growth targets.

In addition to this, we acknowledge the 'Strategic Outcomes' of the Development Plan, as outlined in Figure 1.6 of Chapter 1 *Introduction, Vision and Context*. We draw particular attention to DLRCC's strategic commitments in relation to the "creation of a climate resilient County", the "creation of a compact and connected County" and the "creation of an inclusive and healthy County". We highlight the positive alignment of the Council's strategic outcomes with LDA's remit to deliver significant housing growth, enable an affordable housing sector in Ireland and realise compact growth which promotes modal shift towards healthy, active and sustainable mobility.

Further to this, we note the Housing Target for the Core Strategy, which based on the RSES, sets out a requirement for the delivery of an additional 18,515 residential units during the Plan period (up to the year 2028). In the *Residential Development Capacity Audit* (Table 2.9, page 31), the Core Strategy highlights the significant role that 'Tier 1'¹ lands will play in the realisation of the County's housing targets. We therefore highlight the role that Tier 1 sites such as the former Central Mental Hospital can play in the delivery of the significant quantum of housing required to meet the Core Strategy Housing Target, in line with the projected growth contained within the RSES and NPF.

The former CMH site is also identified in the Dundrum LAP, 2023 (DLAP) as a Key Development Area with guidance provided as to its future development. The DLAP was prepared after the previous SHD Application for the site, including the initial Masterplan, was made. The DLAP states the "Planning Authority were broadly satisfied with much of the design approach put forward in the Land Development Agency non statutory Masterplan....". The DLAP provides a vision for the former CMH lands:

"To provide a new permeable predominantly residential neighbourhood which provides for the redevelopment of the existing land parcel, making suitable use of the protected structures on site, retaining the open character and landscape features of the lands while providing amenities for the new and existing population and suitably integrating with the adjoining residential area, neighbourhood centre and Rosemount Green."

As detailed in the enclosed *Statement of Consistency including Dundrum LAP Statement of Consistency*, the proposed development and enclosed Masterplan are consistent with the DLAP's vision for the lands and will deliver a permeably predominantly residential neighbourhood which maintains the open character of the lands and provides amenities for the new and existing population of the area. The future Application will propose for the appropriate restoration and adaptive reuse of the Protected Structures.

¹ Tier 1 lands are serviced, and in general, part of or contiguous to the built-up footprint of an area (Section 2.3.7.2, Chapter 2, page 31 of Development Plan).

2.7 Housing Tenure Mix

This Part 10 Application will provide for an 100% social and affordable housing scheme.

Some 181 no. units, or 19% of the units will be DLRCC social housing units (including 179 no. social homes and 2 No. Assisted Living units). The remaining 753 no. units, or 81% of the units will be delivered as affordable housing (comprising Right Size for Sale units (52 no.), Affordable for Sale (122 No.), and Cost Rental units (579 no.)) under the *Land Development Agency Act 2021*.

2.8 Pre-Application Consultation

2.8.1 Consultation with An Bord Pleanála

Under the Part 10 process there is no facility to hold Pre-Application Consultation meetings with An Bord Pleanála.

However, the proposed development is informed by the previous SHD Application process. Under that process Pre-Application Consultation with the Board took place, and the eventual ABP Determination and the associated Conditions attached to the permission informed the evolution of the final design of the now proposed development.

2.8.2 Consultation Between Dún Laoghaire Rathdown County Council and the LDA

This Application is made by DLRCC in partnership with the LDA. However, initially the intention was for the LDA to submit a Large-Scale Residential Development Application for the lands, and initial consultation between DLRCC and the LDA was undertaken under the s247 process on 8th February 2024.

DLRCC Housing Department and the LDA agreed to form a partnership to deliver the development of the former CMH lands in order to provide additional social housing on the site (19% social housing rather than the standard 10% social housing and 10% affordable housing normally required) in order to meet a greater proportion of the identified social and affordable housing needs of the County

DLRCC, the LDA and the Design Team worked closely together to develop the Part 10 Application both in terms of the residential elements in addition to the detail design of the community facility, the public open spaces, biodiversity and heritage considerations.



Significant pre-application consultation has taken place with Dún Laoghaire Rathdown County Council (DLRCC) in coordinating this Planning Application. Meetings were held in respect of the Application as well as the revised Masterplan over approximately 8 months with the following Council departments:

- Housing
- Planning
- Conservation
- Roads and Transportation
- Parks and Landscaping
- Drainage
- Public Lighting

Date	Meeting
28 th February 2024	Design Team Meeting
15 th March 2024	Site Walk with members of the DLR Planning team
28 th March 2024	Design Team Meeting
22 nd April 2024	Design Team Meeting
3 rd May 2024	Meeting with DLR Parks and DLR Community & Cultural Development regarding proposed community uses
7 th May 2024	Design Team Meeting
23 rd May 2024	Meeting on site with DLR Conservation officer Julie Craig and DLR Executive Architect regarding the masterplan and revisions to Block 2
14 th June 2024	Briefing Session with DLR Housing Department
21 st June 2024	Meeting with DLR Planning Department with other departments including Parks and Landscaping, Conservation and Biodiversity
25 th June 2024	Site walk with DLR Biodiversity officer and NPWS
22 nd July 2024	Briefing Session for Landscape and Open Space and Biodiversity Officer

Further information in respect of consultation is provided in Chapter 6 of the EIAR.

2.8.3 Consultation with Uisce Éireann

Consultation was first undertaken with Uisce Éireann in the form of a pre-connection enquiry in March 2024 to ensure sufficient capacity in the system. The Confirmation of Feasibility letter from Uisce Éireann is appended to the *Infrastructure Report* prepared by BMCE.

Subsequently, a Statement of Design Acceptance was sought from Uisce Éireann by Barrett Mahony Consulting Engineers (BMCE) in respect of the scheme. The Uisce Éireann Design Acceptance letter, dated 31 July 2024, is appended to the *Infrastructure Report* prepared by BMCE.

2.8.4 Consultation the National Transport Authority (NTA)

Under the 2022 SHD Application pre-consultation engagement was undertaken with the NTA to ensure that the overall proposed development was consistent with the transport planning for the area.

In terms of roads and transportation, the current proposal is similar to the SHD Scheme permitted by ABP in 2022 and it was considered that no further engagement with the NTA was required. Engagement with the DLRCC Roads and Transportation Department was undertaken during the preparation of the Part 10 Application.

2.8.5 Consultation with NPWS

Consultation was undertaken with the NPWS in 2024 in particular to discuss the badger setts identified on site in Spring 2024, including meetings on site between representatives from NPWS, DLRCC (including the Biodiversity Officer), the LDA, Project Ecologist and other members of the Design Team. The *Badger Conservation Management Plan* (enclosed as Appendix 8.8 of the EIAR), was prepared by Dr Chris Smal an acknowledged badger and faunal expert in Ireland. The NPWS' Development Applications Unit reviewed the proposals and responded by letter, dated 11 September 2024, to confirm that:

“the Department is satisfied that the approach detailed in this plan with regards to the treatment of the badger social group living on the site and the setts which they are inhabiting should, if implemented in full and diligently, minimise as far as possible the risk of injury to the individual badgers present, and maximise the chances of the badger social group concerned being able to survive into the future on the site during the operational phase of the residential development.”

Reference is made in the letter to the reduction in the area of the wetland adjoining the Badger Sett, which has been incorporated into the enclosed Plans submitted with this Application.

A derogation licence has been issued by the NPWS in respect of the potential disturbance of a bat roost (located outside the Application site but within the Masterplan lands, refer to Chapter 8 of the EIAR – Biodiversity) arising from lighting and the removal of a tree as proposed in this Application. This is enclosed as Appendix 8.6 of the EIAR.

2.9 Public Consultation

In preparation for the previous SHD Application, the LDA launched an extensive Community and Stakeholder and Engagement process in September 2020 which included leaflet distribution, information gathering through surveys, virtual consultation rooms, a project website, webinars and email correspondence.

Interested members of the public also engaged with the previous SHD Application by making submissions in respect of that application.



Further public information sessions were held on 10th and 12th September 2024 at the Dundrum Library to update local residents on the revised proposals and the Application process.

3.0 PLANNING HISTORY

3.1 Overview of Planning History

We conducted a planning history search of the site using Dún Laoghaire Rathdown County Council's online planning history search facility and that of An Bord Pleanála, in order to establish the planning history of the subject site and of similar sites in the vicinity.

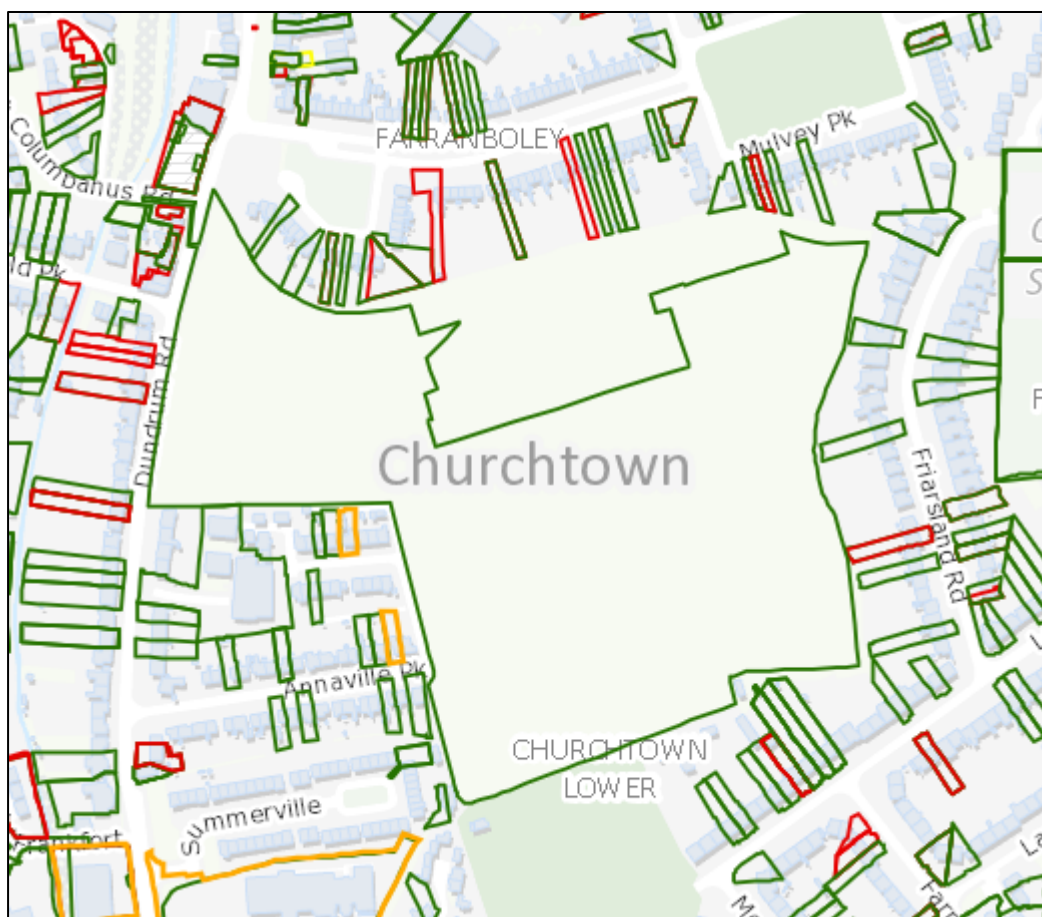


Figure 3.1: Extract from Dún Laoghaire-Rathdown County Council Planning Map Search (July 2024).

The Application site has a limited planning history, we further note that the Main Hospital Buildings are pre-1963.

There are many applications for small scale residential development (i.e. residential extensions) which border the subject site. We have reviewed these applications but have not elaborated given their scale and nature.

3.2 Planning History of Subject Site

The only planning history on the site is a previously permitted Strategic Housing Development (SHD) (ABP Ref. 313176-22) granted in May 2023. That scheme confirms the acceptability in principle of the site's re-development for high quality residential development, with supporting services.

In summary, a 10-year permission was granted for 852 no. residential units (permission originally sought for 977 no. units) with a restaurant, retail units, medical units, creche and community centre. At the time of writing, this permission is currently under judicial review (JR).

3.3 Surrounding Relevant Development Projects

The enclosed EIAR includes a detailed and robust cumulative impact assessment which has regard to the impact of the proposed Part 10 in combination with applicable surrounding committed and planned projects.

The below projects have been granted planning permission by Dún Laoghaire-Rathdown County Council (DLRCC) or An Bord Pleanála (ABP). As detailed in Chapter 3 of the EIAR this comprises development within 2km of a 'major' scale and nature. Having reviewed a number of recent EIARs that relate to development within existing built up areas, the general spatial catchment adopted in respect of cumulative impact assessment is 1km. Whilst 1km was considered by the competent experts to be sufficient to capture any potential cumulative impacts arising, it was decided to extend the spatial catchment to 2km to ensure that the assessment is as thorough and robust as possible given the scale of the proposed project. It is however noteworthy that following the screening exercise by the competent experts, the projects identified as having potential for cumulative impact are within a 1km radius of site. This is set out in further detail in Chapter 23 Cumulative Impacts of the EIAR.

Table 3.1: Surrounding development permitted projects identified as relevant to the assessment of the proposed project.

Reg. Ref.	Location	Development Description	Decision date	Distance from the site
ABP30943021	2.12 ha at Our Lady's Grove, Goatstown Road, Dublin 14	698 no. student bedspace accommodation and associated site works.	03/06/2021	0.26 km
ABP31128721	c.0.9ha at No. 97A Highfield Park (D14P710), and No. 1 Frankfort Castle (D14 HY03), No. 2 Frankfort Castle (D14DE72) and Frankfort Lodge (D14C9P2), Old Frankfort, Dublin 14	115 no. apartments, creche and associated site works.	20/12/2021	0.39 km
ABP31182621	Lands at Knockrabo, Mount Anville Road,, Goatstown, Dublin 14	227 no. apartments and associated site works.	08/03/2022	1.14 km
ABP31013821	Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14	Demolition of existing buildings on site and part of the granite wall along Dundrum Road, excluding Small Hall, construction of 231 no. apartments, childcare facility and associated site works.	25/08/2021	0.95 km



ABP30768320	Green Acres Convent, Drumahill House and the Long Acre, Upper Kilmacud Road, Dundrum, Dublin 14	Provision of 54 no. additional apartments on previously permitted development of 253 no. apartments under ABP-304469-19, increase in childcare facility and associated site works.	10/11/2020	1.44 km
ABP30446919	Greenacres, Longacre and Drumahill House, Upper Kilmacud Road, Dundrum, Dublin 14	253 no. apartments and associated works.	26/08/2019	1.44 km
ABP248265 D16A/0818	Green Acres Convent, Kilmacud Road Upper, Dublin 14.	Demolition of the former Green Acres Convent and the construction of 120 no. apartments in 2 blocks ranging in height from 2 to 5 storeys with all associated site works.	11/09/2017	1.45 km
D20A/0328	University College Dublin, Belfield, Dublin 4	Extension of car park to provide 239 no. spaces	08/12/2020	1.09 km
TA0001	University College Dublin, Belfield, Dublin 4.	10 year permission for 512 student accommodation units (3006 no. bed spaces) including student facility centre, car parking and all associated site works.	09/01/2018	1.09 km
ABP315883	'Dunelm', Rydalmount, Milltown Road, Dublin 6	Demolition of structures, construction of Build to Rent apartments comprising of 63 apartments in 2 blocks with all associated site works	18/01/2024	1.23 km
ABP305261	Building 5, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16	107 no. apartments, cafe and associated site works.	02/12/2019	1.3 km
ABP300024	Lands at the former Paper Mills site, bounded by the River Dodder to the East, Clonskeagh Road to the West, Clonskeagh Bridge to the South West, Dublin 6	Increase in apartment units from 96 to 116 with increase in block heights from 3 to 4 storeys with 30 additional parking spaces & additional bicycle spaces & associated site works.	04/07/2018	1.63 km
ABP311439	Site measuring 0.29ha, Bounded by Kilmacud Road Upper to the north, Drummartin Link Road to the west, and Hazelbrook Apartments to the east and south, Dublin 14	Demolition of existing disused agricultural shed structure and the construction of a residential block 3 to 6 storeys consisting of 52 dwelling units	27/04/2022	1.75 km
ABP313048	9/14 and 11C, Milltown Road, Milltown, Dublin 6. The application site consists of the former Murphy and Gunn site	Construction of 97 Build to Rent apartments	26/07/2023	1.78 km



	(currently Autovision) and the former Saint Joseph's Junior Education Centre site.			
ABP312539	Cunningham House, Trinity Hall, Dartry, Dublin 6.	Demolition of existing building, construction of 358 no. student bedspace accommodation, 4 no. staff apartments and associated site works.	04/07/2022	1.8 km
ABP312170	Marmalade Lane, Wyckham Avenue, Dundrum, Dublin 16.	531 no. Build to Rent apartments, creche and associated site works.	08/04/2022	1.91 km
ABP309931	24,26 28, Fosters Avenue, Mount Merrion, Blackrock, Co Dublin	Demolition of existing buildings on site and construction of 72 no. apartments, communal open space areas, parking spaces, vehicular, pedestrian and servicing access from Foster's Avenue, ESB substation and switch room, and all associated site works	28/08/2023	1.98 km
ABP31969724	Mount Anville Lands, Lower Kilmacud Road, Dublin 14, D14KX80	Demolition of existing building and construction of 114 residential units	15/04/2024	1.81km

The below projects are planned projects that are at various stages of the planning process. They key distinction from the projects listed above is that they do not have planning permission at the time of writing.

Whilst development without planning permission would not usually form part of the planning history considerations for a site, the below planned projects are considered relevant for the purposes of the EIAR. Refer to Chapter 3 of the EIAR for further details.

This comprises development within 2km of a 'major' scale and nature. Having reviewed a number of recent EIARs that relate to development within existing built up areas, the general spatial catchment adopted in respect of cumulative impact assessment is 1km. Whilst 1km was considered by the competent experts to be sufficient to capture any potential cumulative impacts arising, it was decided to extend the spatial catchment to 2km to ensure that the assessment is as thorough and robust as possible given the scale of the proposed project. It is however noteworthy that following the screening exercise by the competent experts, the projects identified as having potential for cumulative impact are within a 1km radius of site. This is set out in further detail in Chapter 23 Cumulative Impacts of the EIAR.

In this regard, we further note that planning permission may have been granted in relation to any of the below planned/ undetermined schemes at the point at which An Bord Pleanála assess the proposed development. We do however note that the Board will therefore be in a position to take account of such projects as part of its assessment process, assisted by the assessment provided within the EIAR in respect of the below projects.



Table 3.2: Surrounding development planned projects identified as relevant to the assessment of the proposed development.

Reg. Ref.	Location	Development Description	Registered Date	Distance from the site
ABP31293522	0.79 ha at Sommerville House, Dundrum Road, Dublin 14	Demolition of all structures, construction of 111 no. apartments and associated site works	07/03/2022	0.21 km
ABP31323522	0.34 hectares comprising the car sales premises currently known as Vector Motors (formerly known as Victor Motors), Goatstown Road, Dublin 14, D14FD23	Demolition of existing building on site, construction of 221 no. student bedspaces and associated site works.	06/04/2022	0.53 km
ABP31322022	site 3.5335ha incorporating the old Dundrum Shopping Centre known as Main Dundrum Street Village Centre (D14K3T7)	Demolition of all existing buildings on site, construction of 881 no. apartments, creche and associated site works.	05/04/2022	0.79 km
ABP316470	Site of approx. 0.24 ha on lands at Frankfort Centre, Dundrum Road, Dublin 1	The construction of 64 no. apartment units in the form of a 5-6 storey apartment blocks, the provision of a ground floor retail/cafe unit, and Public Realm upgrades to Dundrum Road and all other associated site works above and below ground associated with the proposed development. An NIS has been submitted with the application.	25/4/2023	0.37 km

In relation to the above, it should be noted that between the completion of the EIAR and the submission of this Application, ABP 31293522 (included in the table above) was refused planning permission by An Bord Pleanála.

3.3.1 Details of Future Planning Application at the Subject Lands

This section provides further detail in relation to the future planning application which will be made in respect of the remaining part of the former CMH lands once the proposed Part 10 has been decided.

This proposal relates specifically to the main hospital building and adjoining lands and reflects the second component of the delivery of the site-wide Masterplan.

The proposed development strategy in respect of the delivery of the site-wide Masterplan is covered in depth in the Introduction of this Report. The compatible, yet standalone, nature of the two relevant planning proposals is further detailed.

For context and for the purposes of the cumulative impact assessment undertaken within the EIAR, an overview of the future development is set out below, including an extract from the Proposed Masterplan Site Plan showing the current proposal and the future development of the Masterplan.

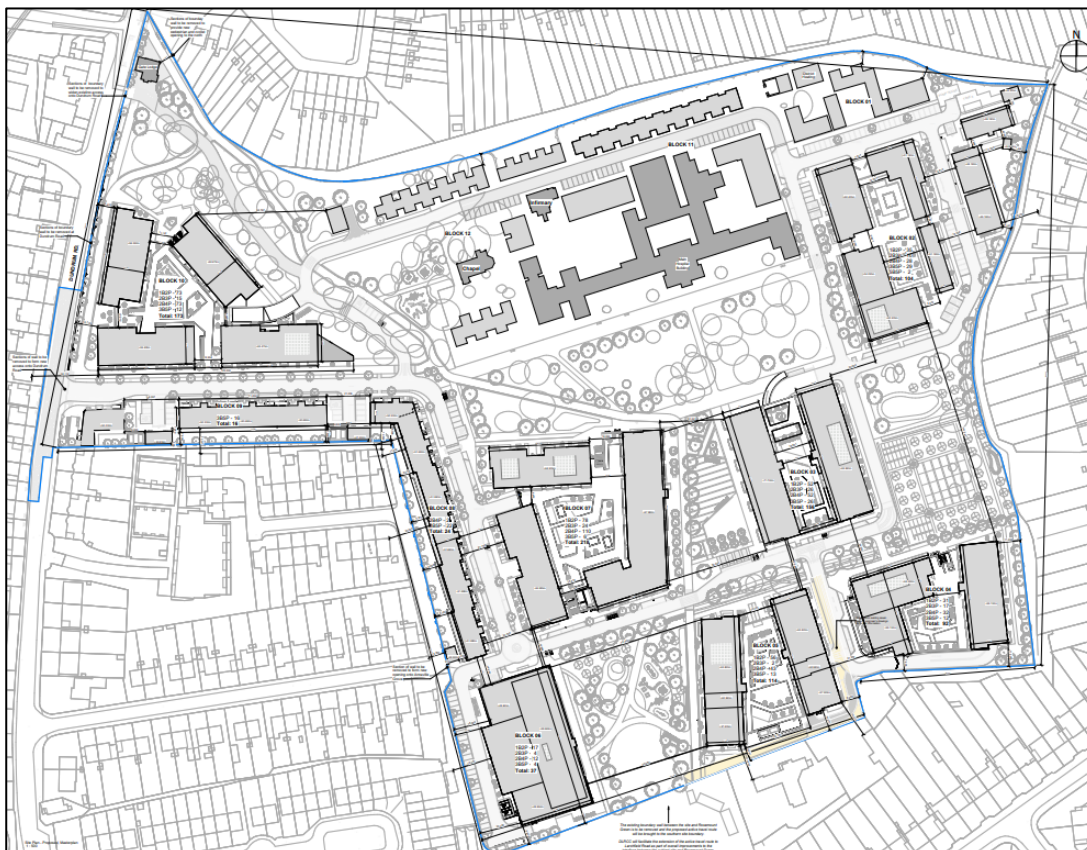


Figure 3.2: Extract from the Site Plan, Proposed, Masterplan showing the Masterplan layout. (Source: Reddy A+U Drawing No. DCD-02-SW-ZZZ-DR-RAU-AR-1050 P3 S-1, 2024.)

At the time of writing, it is envisaged that the future planning application will comprise 68 no. residential units and 5,453 sq m of non-residential floorspace:

- 2,779 sq m of demolition, including:
 - Outbuildings and ancillary structures to rear of Main Hospital Building;
 - Eastern wing of Main Hospital Building (later addition to building);
 - Chimney structure;
 - Structures adjacent to farm buildings.
- Change of use and adaptation of the following existing buildings:
 - Main Hospital (5,153 sq m) – Enterprise Centre
 - Chapel (107 sq m) – Community Use
 - Infirmary (158 sq m) – Community/ Enterprise Use
 - Coach House (35 sq m) – Storage



- Farm Buildings (246 sq m) – Residential
- Workshops (151 sq m) – Residential
- New residential buildings:
 - Block 01 (1,111 sq m (incl. farm buildings) – 12 no. residential units
 - Block 11 (3,229 sq m) – 36 no. residential units
 - Block 12 (2,133 sq m) (incl. workshops) – 20 no. residential units
- 62 no. car parking spaces.

LDA and Dún Laoghaire-Rathdown County Council will continue to engage in respect of the future proposal of the remaining Masterplan lands before the scheme is fully finalised. The development strategy is largely influenced by the importance of identifying a long-term secure use and the complexities of adapting a building of the significance of the Main Hospital Building.

Detailed research work has been ongoing in respect of the interior and structure of the existing buildings to better inform proposals and assessments of potential impact, which was delayed for a time due to the use of the building by the HSE.

Furthermore, given that the submission of the future application will follow the determination of the proposed Part 10 project, it is possible, should planning permission be granted, that the future development will require amendment to respond to any planning conditions imposed in respect of the Part 10 scheme.



4.0 THE PROPOSED RESIDENTIAL DEVELOPMENT

4.1 Description of Development (as per Statutory Notices)

The statutory notices describe the proposed development as follows:

“In accordance with Section 175(4) and Section 177AE(4) of the Planning and Development Act, 2000 (as amended) Dún Laoghaire-Rathdown County Council, in partnership with The Land Development Agency, gives notice of its intention to make an application for approval to An Bord Pleanála under Section 175(3) and Section 177AE(3) of the Planning and Development Act, 2000 (as amended) for a ten year approval to carry out the following proposed development which is located on a total application site area of c. 9.7 ha, located on the former Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14 and areas of Dundrum Road and St. Columbanus Road, Dublin 14. The subject site is in the immediate setting and curtilage of a number of protected structures, namely the ‘Asylum’ (RPS No. 2072), the ‘Catholic Chapel’ (RPS No. 2071) and the ‘Hospital Building’ (RPS No. 2073).

The development will consist of the construction of a residential scheme of 934 no. dwellings on an overall site of c. 9.7 ha.

The development will consist of the demolition of existing structures associated with the existing use (3,677 sq m), including:

- *Single storey former swimming pool / sports hall and admissions unit (2,750 sq m);*
- *Two storey redbrick building (305 sq m);*
- *Single storey ancillary and temporary structures including portacabins (618sq m);*
- *Removal of existing internal sub-divisions/ fencing, including removal of security fence at Dundrum Road entrance;*
- *Demolition of section of porch and glazed screens at Gate Lodge building (4 sq m);*
- *Removal of walls adjacent to Main Hospital Building;*
- *Alterations and removal of section of wall to Walled Garden.*

The development will also consist of alterations and partial demolition of the perimeter wall, including:

- *Alterations and removal of section of perimeter wall adjacent to Rosemount Green (south);*
- *Formation of a new opening in perimeter wall at Annville Grove to provide a pedestrian and cyclist access;*
- *Alterations and removal of sections of wall adjacent to Dundrum Road (including removal of existing gates and entrance canopy), including reduction in height of section, widening of existing vehicular access, and provision of a new vehicle, cyclist and pedestrian access;*
- *Alterations and removal of section of perimeter wall adjacent to Mulvey Park to provide a pedestrian and cyclist access.*



The development with a total gross floor area of c. 94,058 sq m (c. 93,980 sq m excluding retained existing buildings), will consist of 934 no. residential units comprising:

- 926 no. apartments (consisting of 342 no. one bedroom units; 98 no. two bedroom (3 person) units; 352 no. two bedroom (4 person) units; and 134 no. three bedroom units) arranged in 9 blocks (Blocks 02-10) ranging between 2 and 8 storeys in height (with a lower ground floor to Blocks 02 and Block 10 and Basements in Blocks 03 and 04), together with private balconies and private terraces and communal amenity open space provision (including courtyards) and ancillary residential facilities, including an 130 sq m internal residential amenity area at the Ground Floor Level of Block 3;
- 6 no. three bedroom duplex apartments located at Block 02, together with private balconies and terraces.
- 2 no. 5 bedroom assisted living units and private rear gardens located at Block 02.

The development will also consist of 4,380 sq m of non-residential uses, comprising:

- Change of use and renovation of existing single storey Gate Lodge building (former reception/staff area) to provide a café unit (78 sq m);
- 1 no. restaurant unit (266 sq m) located at ground floor level at Block 03;
- 3 no. retail units (1,160 sq m) located at ground floor level at Blocks 03 and 07;
- 1 no. medical unit (288 sq m) located at ground floor level at Block 02;
- A new childcare facility (716 sq m) and associated outdoor play area located at lower ground and ground floor level at Block 10;
- A management suite (123 sq m) located at ground floor level at Block 10; and
- A new community centre facility, including a multi-purpose hall, changing rooms, meeting rooms, storage and associated facilities (1,749 sq m) located at ground and first floor level at Block 06.

Vehicular access to the site will be from a new signalised access off Dundrum Road to the south of the existing access and the existing access off Dundrum Road will be retained for emergency vehicle, pedestrian and cyclist access only. The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, active travel routes for cyclists and pedestrians, pathways and boundary treatments, street furniture, wetland features, part-basement, car parking (524 no. spaces in total, including car sharing and accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections (including connection into existing surface water sewer in St. Columbanus Road); ducting; plant (including external plant for Air Source Heat Pumps and associated internal heating plantrooms); waste management provision; SuDS measures (including green roofs, blue roofs, bio-retention areas); attenuation tanks; sustainability measures (including solar panels); signage; public lighting; any making good works to perimeter wall and all site development and excavation works above and below ground.”

4.2 Development Statistics

Table 4.1: Proposed scheme Key Development Statistics.

Development Statistic	Part 10 Application
Site Area	9.7 ha (includes 0.1 ha outside of the former CMH site)
No. of Residential Units	934 no. units
Total Gross Floor Area	c. 94,058 sq m (c. 93,980 sq m excluding retained existing buildings)
Non-Residential Floorspace	4,380 sq m
Demolition of Certain Existing Structures	3,677 sq m
Gross Residential Density	97 units p/h (based on 9.6 ha site, which excludes the 0.1 ha of public road outside the former CMH site which is included in the Application site)
Net Residential Density	146 units p/h (based on a net site area of 6.7 ha excluding the public open space and Gate Lodge, and a portion of the site for the other non-residential uses, as per the methodology in the Compact Settlement Guidelines 2024)
Plot Ratio	0.98 (based on a 9.6 ha area, i.e. excluding the 0.1 ha outside the main former CMH site)
Site Coverage	30% (based on a 9.6 ha area, i.e. excluding the 0.1 ha outside the main former CMH site)
Height	2 – 8 storeys (including Lower Ground Floors at Block 02 and 10 over Basement Levels at Blocks 03 and 04.)
Car Parking	524 no. spaces (466 no. residential spaces, (including 57 no. visitor spaces and 12 no. Car Share spaces) (0.5 spaces per unit), and 58 no. non-residential)
Motorbike Parking	79 no. Motorbike Spaces (57 no. residential spaces and 22 no. spaces).
Public Open Space	2.9 ha

*Refer to Section 5.4 for detail on net site area and density calculations.

4.3 Overview of Proposed Development

934 NO. RESIDENTIAL UNITS

The proposed development will deliver 934 no. residential units arranged in 9 no. blocks (Blocks 02-10) ranging between 2 and 8 storeys in height (including Lower Ground Floors at Block 02 and 10) over Basement Levels at Blocks 03 and 04.

The proposed scheme wide housing mix is as follows:

Table 4.2: Proposed scheme wide unit mix.

	Apartments	Duplexes	Total	
1 bed	342		342 (36.6%)	
2 bed (3 person)	98		450 (48.2%)	
2 bed (4 person)	352			
3 bed	134	6	140 (15%)	142 (15.2%)
5 bed	2		2 (0.2%)	
	928	6	934	

The proposed residential units will be arranged as follows:

Block 02

Block 02 consists of new build duplexes and apartments adjacent to the former Main Hospital Building. A medical centre is proposed at the north west of Block 02 accessible from ground level adjacent to the former Main Hospital Building.

Block 02 is broken into a number of elements which reflect the geometry of the adjacent buildings stepping up from 2-storeys at the boundary to 6-storeys closer to the centre of the site.

A homezone street is proposed between the apartments at Block 02 and the apartments/duplexes with on-street parking provided close to front doors integrated with the landscape design.

Residential amenity is provided in a communal landscaped courtyard above parking.

The building has a gross floor area of 11,245 sq m and comprises 104 no. residential units, including:

- 104 no. apartments, comprising:
 - 35 no. 1-bed units, 10 no. 2-bed 3 person units, 28 no. 2-bed 4 person units, 23 no. 3-bed units;
 - 6 no. duplex apartments (6 no. 3-bed units); and
 - 2 no. Assisted Living Units (2 no. 5-bed units).

The proposed medical centre (288 sq m) is located within Block 02.

Block 03

Block 03 consists of new build apartments adjacent to the walled garden and the new public plaza. Retail spaces and a restaurant are proposed at ground floor at the west side of Block 03 with a covered colonnade.

Residential amenity is provided partly in a communal landscaped courtyard, above car parking, with an internal residential amenity space (130 sq m) at ground floor overlooking the central plaza. The building heights at Block 03 are predominantly 6 and 8-storey comprising of two linear blocks to allow daylight into the courtyard. Plant areas are proposed at a lower ground level.

The building has a gross floor area of 15,662 sq m and comprises 156 no. residential units, including:

- 156 no. apartments (52 no. 1-bed units, 26 no. 2-bed 3 person units, 52 no. 2-bed 4 person units and 26 no. 3-bed units).

Proposed retail unit (274 sqm) and a restaurant unit (266 sqm) are located at the ground floor of Block 03.

Block 04

Block 04 consists of new build apartments located to the south of the Walled Garden. Residential amenity is provided in a communal landscaped courtyard above parking.

Block 04 steps from 4-storeys at the boundaries to existing neighbouring residences at Larchfield Road and Friarsland Road to a maximum height of 6-storeys at the north west corner, which relates to the massing at the adjacent section of Block 03. Clerestory windows are proposed to the south elevation of Block 04 to prevent overlooking from the proposed development

The building has a gross floor area of 8,957 sq m and comprises 92 no. apartments, including:

- 92 no. apartments (31 no. 1-bed units, 17 no. 2-bed 3 person units, 32 no. 2-bed 4 person units, and 12 no. 3-bed units).

Block 05

Block 05 consists of new build apartments adjacent to the proposed Public Park to the south of the site adjacent to Rosemount Green. Residential amenity is provided in a communal landscaped courtyard above car parking.

Block 05 steps in height from 4-storeys at the south, adjacent to existing residences at Larchfield Road, to 5- and 6-storeys at the north elevation. Placement of windows has been carefully considered to mitigate any potential impact to the privacy of neighbours at Larchfield Road.



The building has a gross floor area of 10,450 sq m and comprises 114 no. residential units, including:

- 114 no. apartments (56 no. 1-bed units, 2no. 2-bed 3 person units, 43 no. 2-bed 4 person units and 13 no. 3-bed units)

Block 06

Block 06 consists of new build apartments to the west of the proposed community park, in the southwestern corner of the site.

Extensive community facilities consisting of a multipurpose hall, community rooms and sports changing facilities are proposed at Ground and First Floor. Residential amenity is provided at second floor level with the provision of a landscaped roof garden to the south accessed from the residential cores. Surface car parking is provided for residents and visitors to the community facility.

Block 06 steps from one to two-storeys adjacent to the western site boundary to 4-storeys at the new communal park and is on-axis with the proposed street between Blocks 07 and 08. Balconies and window placement on the western facade have been designed to mitigate any potential impact to neighbouring properties at Annville Grove.

The building has a gross floor area of 5,383 sq m and comprises 37 no. residential units, including:

- 37 no. apartments (17 no. 1-bed units, 4 no. 2-bed 3 person units, 12 no. 2-bed 4 persons and 4 no. 3-bed units).

The community facilities consist of a multipurpose hall, community rooms and sports changing facilities (1,749 sqm sq m).

Block 07

Block 07 is located in the central part of the site, it consists of new build apartments adjacent to the proposed plaza with retail spaces at the east at Ground Floor.

Residential amenity is provided in a communal landscaped courtyard above parking. Block 07 is primarily a six and seven-storey building with various set-backs and insets to break down the building's massing at primary locations. The building's footprint was designed to take account of the existing mature trees at the Central Parkland while also addressing the Public Plaza and the streets to the west and south. A break has been provided in the north east corner of the block, providing views through to the facade of the main hospital building from the residential amenity areas.

The building has a gross floor area of 20,960 sq m and comprises 218 no. residential units, including:

- 218 no. apartments (78 no. 1-bed units, 24 no. 2-bed 3 person units, 110 no. 2-bed 4 person units and 6 no. 3-bed units)

The building also comprises of retail floorspace 793 sq m at ground floor level.

Block 08

Block 08 consists of new build apartments along the western boundary of the site adjacent to Annaville Grove.

Residential amenity is provided by communal landscape space to the rear between Block 08 and the boundary wall at Annaville Grove. Surface car parking provided.

The scale of Block 08 allows the development to 'step down' in height from the centre of the site to the site boundaries.

Block 08 has a gross residential area of 2,555 sq m and comprises 24 no. residential units, including:

- 24 no. apartments (2 no. 2 -bed 3 person units and 22 no. 2-bed 4 person units)

Block 09

Block 09 is located in the north western corner of the site adjacent to the boundary with Annaville Grove, it consists of 2-storey apartment Blocks provided close to the proposed new entrance at Dundrum Road, providing a transition in scale to adjoining developments to the south.

Residential amenity is provided by communal landscape space to the rear between Block 09 and the boundary wall at Annaville. Surface car parking is provided.

Block 09 has a gross residential area of 1,729 sq m and comprises 16 no. residential units, including:

- 16 no. apartments (16 no. 3-bed units)

Block 10

Block 10 consists of new build apartments adjacent to Dundrum Road, the existing tree-lined avenue and the proposed new access route into the site, at the western end of the site.

A childcare facility for the development is proposed at the eastern elevation with external play space proposed. Residential amenity is provided in a communal landscaped courtyard, with car parking below.

Block 10 is formed as a number of brick elements stepping in height from 5-storeys to 6-storeys with contrasting tones of materials provided creating visual interest in the facade. The

existing ground levels allow for three no. apartments to be proposed towards the existing entrance at Dundrum Road, creating a 7-storey element one location.

Block 10 has a gross floor area of 17,038 sq m and comprises 173 no. residential units, including:

- 173 no. apartments (73 no. 1-bed units, 15 no. 2-bed 3 person units, 73 no. 2-bed 4 person and 12 no. 3-bed units)

The building also comprises a childcare facility (716 sq m) with external amenity space at ground floor level and a management suite (123 sq m).

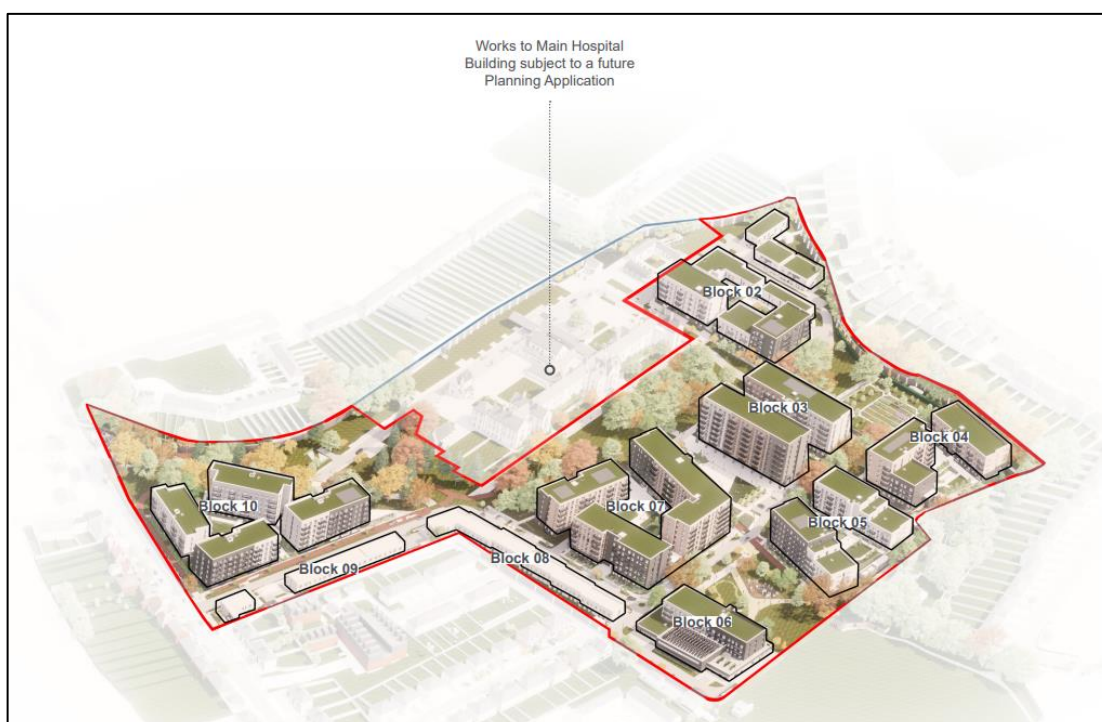


Figure 4.1: Extract from Reddy Architecture and Urbanism's *Architectural Design Report* showing the proposed site layout. (Source: RAU 2024.)

4,380 SQ M OF NON-RESIDENTIAL FLOORSPACE

The proposed development will deliver a range of non-residential uses which will be integrated into the proposed residential blocks (mainly at ground floor level) and within the existing Gate Lodge.

The proposed non-residential uses include a childcare facility (716 sq m), a medical centre (288 sq m), a restaurant (266 sq m), a café (78 sq m), 3 no. retail units (1,160 sq m), a management suite (123 sq m) and a community facility (1,749 sq m). The new community centre facility includes a multi-purpose hall changing rooms, meetings rooms, storage and associated facilities. The community facility was designed in close coordination with DLRCC's Parks Department.

The proposed non-residential uses will serve both the residents of the proposed development and the existing community.

Table 4.3: Proposed apartment development unit mix.

Building	Unit	Area (GIFA)
Gate Lodge	Café	78
Block 02	Medical	288
Block 03	Restaurant	266
Block 03	Retail	274
Block 06	Community	1,749
Block 07	Retail	279.8
Block 07	Retail	513.3
Block 10	Creche	716

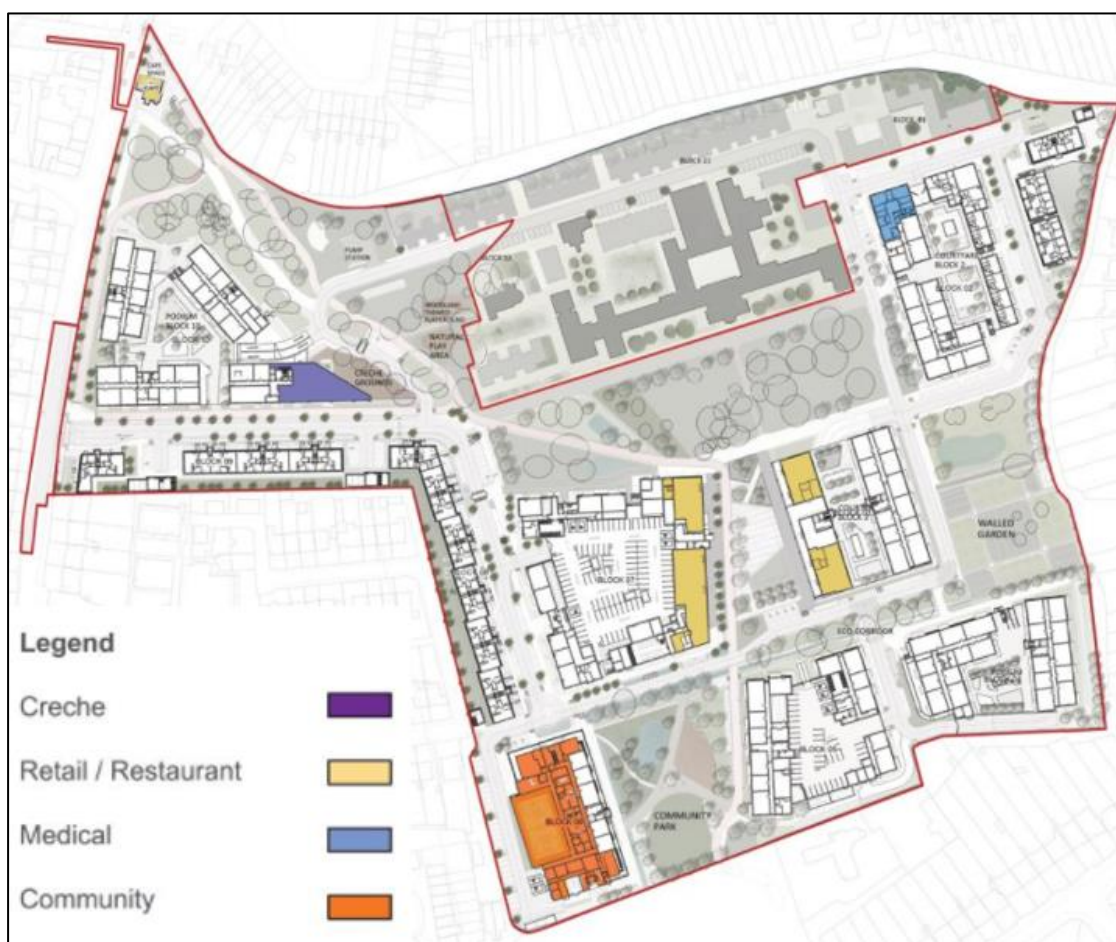


Figure 4.2: Extract from Reddy Architecture and Urbanism’s *Architectural Design Report* showing the proposed non-residential uses. (Source: RAU 2024.)

c. 29,767 SQ M (c. 2.98 HA) OF PUBLIC OPEN SPACE

The proposed development provides a significant quantum of high-quality open space which will be accessible to the public. The proposed public open space provision equates to c. 30% of the total Part 10 site area. The space has been designed inclusively to serve the existing community as well as the residents of the proposed residential development. The removal of the southern section of the existing perimeter wall will result in a continuation of public open space between the proposed development and the existing Rosemount Green.

The proposed public open space incorporates a number of landscape features, such as the walled garden, mature trees and courtyard and open green space that contribute to the setting of the main Hospital Building.



Figure 4.3: Extract from Reddy Architecture and Urbanism's *Architectural Design Report* showing the proposed public open space provision (c.2.9 ha of open space)

PARTIAL DEMOLITION OF PERIMETER WALL AND CREATION OF NEW VEHICULAR, CYCLIST AND PEDESTRIAN ACCESS POINTS

In order to integrate the proposed development into the surrounding area, ensure permeability and improved connectivity between the application site and surrounding streets and achieve a positive interface with the surrounding public realm, the proposed development includes the removal of a number of sections of existing perimeter wall.

This will include the removal of the section of perimeter wall adjacent to Rosemount Green (south) to provide an interface with Rosemount Green and to facilitate the extension of the active travel route to Larchfield Road as part of overall improvements to the interface between the subject site and Rosemount Green. It is proposed that sections of perimeter wall adjacent to both Annville Grove (west) and Mulvey Park (north) are removed to provide pedestrian and cyclist access.

Further to this, it is proposed that sections of the perimeter wall, adjacent to Dundrum Road (west), are removed and/or altered to provide a new vehicular, cyclist and pedestrian access.

The proposal also includes the widening of the existing Dundrum Road access, this entrance will be used for emergency vehicles, pedestrian and cyclist access only.



Figure 4.4: Extract from the Masterplan showing proposed access points and breaks in the perimeter wall.



DEMOLITION OF EXISTING STRUCTURES (3,677 SQ M)

The proposed development will include the demolition of a number of existing buildings and structures across the site with a total floorspace of 3,677 sq m. This includes the former swimming pool/ sports hall and admissions unit, a two storey redbrick building, temporary structures including portacabins, an element of the Gate Lodge and the removal of the security fence at Dundrum Road. These structures are modern and their removal will not impact on the Protected Structures nor heritage considerations on site.

ANCILLARY DEVELOPMENT

The proposed development will provide a total of 524 no. car parking spaces, including visitor spaces and spaces that serve the non-residential element of the scheme, accessible spaces and car share parking provision.

In total, the residential car parking and visitor car parking, will be at an average ratio of 0.5 space to each residential unit, with additional non-residential provision. As detailed in Section 5.2.46 the enclosed *Planning Policy Statement and LAP Statement of Consistency*, the car parking provision is below the standard, but deviations from the car parking standard is acceptable under certain circumstances detailed in Section 12.4.5.2 of the Development Plan.

The proposed development will also provide a total of 2,532 no. bicycle spaces. Some 2,338 no. residential bicycle parking spaces (1,850 no. long stay and 488 no. short stay/ visitor), and 144 no. commercial bicycle parking spaces (60 no. long stay and 84 no. short stay). The quantum of cycle parking is consistent with requirements for residential cycle parking detailed in the *Apartment Guidelines 2023* and the requirements for non-residential cycle parking standard detailed in the *DLRCC Standards for Cycle Parking and Associated Cycle Facilities for New Developments, 2018*.

4.4 Site-Specific Management

This section provides details of site management in respect of the public open space throughout the site, the community facilities proposed and car parking. It also has regard to taking in charge and site safety.

This should be read in conjunction with the *Management Strategy Report*, prepared by Savills which specifically addresses the management of the residential units and associated facilities.

4.4.1 Taking in Charge

A Taking in Charge Plan (Dwg. No. DCD-02-SW-ZZZ-DR-RAU-AR-1007 Rev P3 S-1) is enclosed with this planning application submission. It is proposed that all internal roads, pathways and public open space within the site boundary are taken in charge by Dún Laoghaire-Rathdown County Council (DLRCC).



Subject to agreement it is expected that the Community Facility will be run by an appointed board of management with appropriate representation to provide a safe, accessible and affordable space to cater for a diversity of community related activities.

4.4.2 Public Open Space

The proposed development includes a significant quantum of public open space. As set out above, it is proposed that this will be taken in charge by DLRCC. On this basis, we confirm that it is not intended that the upkeep of the public open space will fall under the same management regime as the residential units, which will be managed by a management company.

A number of new vehicular, cyclist and pedestrian access points are proposed as part of the development. It is proposed that 24 hour access will be maintained at each access point, enabling 24 hour access for the public (unless restricted for one off events).

In the interest of protecting biodiversity, public lighting is omitted from the walled garden as per consultation with DLRCC Biodiversity Officer and the NPWS and access will be restricted to daylight hours.

We further note the new positive interface between the subject lands and Rosemount Green at this location which is facilitated by the proposed removal of a significant section of perimeter wall. The enhanced permeability this location will facilitate increased movement and fluidity of pedestrians and cyclists between the two public spaces, providing greater opportunities for a range of users and activities.

The taking in charge of the proposed public open space will ensure a seamless integration with Rosemount Green, an existing DLRCC managed public open space. DLRCC will facilitate the extension of the active travel route to Larchfield Road as part of overall improvements to the interface between the subject site and Rosemount Green.

4.4.3 Site Safety

The public realm throughout the site has been designed to ensure the delivery of a safe place to live, work and visit. In this regard, the following key design principles have been incorporated into the design strategy:

- The maximisation of active frontages which provide activation and natural surveillance to public spaces;
- The provision of non-residential uses at ground floor level, including associated outdoor seating, to activate apartment blocks and adjacent public spaces and provide activity at different times of the day;
- Legible routes, throughout site to ensure safe movement of people, included designated cycle lanes;
- Siting of surface car parking and play spaces in locations where they are overlooked to provide passive surveillance;
- Comprehensive public lighting scheme in respect of all open spaces, roads, car parks and access points;



The *Management Strategy Report*, prepared by Savills, makes reference to a number of security measures that will be considered to supplement the above and ensure the safety of the development.

4.4.4 Community Facilities

The proposed development includes a large community facility at the ground and first floors within Block 06. The new community centre facility includes a multi-purpose hall, changing rooms, meeting rooms, storage and associated facilities with a total floor area of 1,749 sq m. The proposal has been designed to provide a genuine community facility that can provide for a range of functions and users within the local community, including local sports groups, community groups, events and local businesses (not exhaustive).

The community facility is located at the southernmost part of the site, where the proposed development interfaces with Rosemount Green, an existing public open space. This is considered to provide for an enhanced network of community facilities within the Dundrum area which will be further enhanced with the delivery of the remaining Masterplan proposals.

This also aligns with the Specific Local Objective (SLO) 113, contained within the Development Plan, which applies to both the subject lands and Rosemount Green and states:

“Any integration of / or connectivity between the Central Mental Hospital lands with the adjoining residential area should include the development of enhanced sporting facilities/ infrastructure for existing and future residents.”

The management of the community facility has been the subject of engagement between DLRCC Parks and Housing Departments and the LDA during the development of this Part 10 Application. Facility management was discussed, as well as the interface within the envelope of Block 6 a residential building (which is identified as one of the Blocks DLRCC would secure for social housing).

As set out above, the facility has been designed to be used for a range of activities by a variety of users which was informed by the public consultation process. Its location ensures accessibility for the local wider community and a positive relationship with the existing community space at Rosemount Green.

The Applicant and the LDA are committed to creating a sustainable, publicly accessible, community centre at this location.

4.4.5 Car Parking

Car parking management is detailed in the *Traffic and Transport Assessment & Mobility Management Plan*, prepared by ILTP and also discussed within the *Management Strategy Report*, prepared by Savills. Most importantly from a management perspective, we note that the residential car parking spaces will be allocated in line with the management regime for the residential development. As part of this, parking spaces will be allocated at the contract stage in line with the car parking allocation ratios set out in the TTA.



The implementation of the *Mobility Management Plan* (MMP) prepared by ILTP is also a key element of transport management at the site. The MMP provides for the appointment of a Mobility Manager by the management company for the residential development who will promote and monitor the provisions of the MMP.



5.0 KEY PLANNING ISSUES FOR THE FORMER CENTRAL MENTAL HOSPITAL LANDS

This section refers to key planning issues pertaining to the former Central Mental Hospital lands and should be read in conjunction with the *Statement of Consistency including Dundrum LAP Statement of Consistency* also prepared by Tom Phillips + Associates:

For the avoidance of doubt, this Planning Report is not intended to provide a further full assessment of the scheme. Instead, it provides supplementary commentary surrounding what we would consider to be the key issues for the redevelopment of the lands. The below assessment is therefore not to be taken as an exhaustive review of the scheme.

5.1 Policy Context

As noted previously, the *Statement of Consistency including Dundrum LAP Statement of Consistency*, prepared by Tom Phillips + Associates, provides a full commentary on all relevant planning policy and demonstrates the general policy compliant nature of the proposed development. For full details on compliance with the relevant national, regional and local planning policy and guidance documents, refer to the *Statement of Consistency including Dundrum LAP Statement of Consistency*.

5.2 Principle of Development

The proposed development which comprises a residential development with some non-residential supporting facilities is acceptable in principle, having regard to the policy designations pertaining to the lands.

The subject lands benefit from a residential land zoning under the provisions of the *Dún Laoghaire-Rathdown Development Plan 2022-2028* the specific zoning 'Objective A' is "*To provide residential development and improve residential amenity while protecting the existing residential amenities*". As well as residential development being 'permitted in principle', we confirm that the proposed non-residential uses are 'permitted in principle' and 'open for consideration' under this zoning objective.

5.3 Institutional Lands – 'INST' Objective Designation

As outlined throughout this submission, the application site is subject to the INST objective which attracts a number of specific planning policy requirements contained within Section 4.3.1.4 and 12.3.7.10 of the Development Plan.

Section 4.3.1.4 contains **Policy PHP21: Development on Institutional Lands** which states the following:

"It is the Policy Objective to retain the open character and/or recreational amenity of land parcels that are in institutional use (such as religious residential or other such uses) and are proposed for redevelopment."



The Plan goes on to state that:

“Where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the zoning objectives of the area being adhered to and the open character and recreational value of the lands being retained. Where institutional lands – identified by an ‘INST’ objective on Development Plan Maps – are proposed to be developed:

- *A minimum of 25% of the entire INST land parcel, as determined by the Planning Authority, will be required to be retained as accessible public open space. In determining the area to which the “INST” objective applies the planning authority shall have regard to the existing and historical land use and associations between land uses, and the extent to which any lands contribute to the open character and setting of the core institutional function.*
- *This provision must be sufficient to maintain the open character of the site with development proposals structured around existing features and layout, particularly by reference to retention of trees, boundary walls and other features as considered necessary by the Council (refer also to Section 12.3.7.10).*
- *The provision must be sufficient to maintain and/or improve the recreational value of the site particularly with regard to adding to the sustainable neighbourhood infrastructure of the area.*
- *Any proposal for development other than that directly related to an existing social infrastructure and/or institutional uses, will require the preparation and submission of a masterplan.*
- *Average net densities should be in the region of 35 - 50 units p/ha. In certain instances, higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands.”*

Section 12.3.7.10 of the Development Plan also relates to Institutional Lands, it states:

“Where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the area’s zoning objectives and the open character of the lands being retained.

There are still a number of large institutions in the established suburbs of the County which may be subject to redevelopment pressures in the coming years. The principal aims of any eventual redevelopment of these lands will be to achieve a sustainable amount of development while ensuring the essential setting of the lands and the integrity of the main buildings are retained.

In order to promote a high standard of development a comprehensive Masterplan should accompany a planning application for institutional sites. Such a Masterplan must adequately take account of the built heritage and natural assets of a site and established recreational use patterns. Public access to all or some of the lands may be required. Every planning application lodged on institutional lands shall clearly demonstrate how they conform with the agreed Masterplan for the overall site.



Should any proposed development deviate from the agreed Masterplan then a revised Masterplan shall be agreed with the Planning Authority. A minimum public open space provision of 25% of the total site area will be required on Institutional Lands. This provision must be sufficient to maintain the open character of the site - with development proposals built around existing features and layout, particularly by reference to retention of trees, boundary walls and other features as considered necessary by the Council."

In this regard, we note that the subject lands are state owned and no longer required for institutional use. It is highlighted as a national priority to optimise state lands to deliver compact urban development and affordable housing. We therefore confirm that the subject lands have been identified, at a national level, to contribute to the fulfilment of the above stated objective and are not required for an alternative institutional use. The Development Plan Core Strategy also identifies the site as an 'Infill/Windfall' site (see Figure 2.8 of the Development Plan) and it is specifically identified in the Core Strategy as a strategic regeneration site.

Furthermore, the key policy requirements arising from the INST designation are set out below. These are addressed in full in the *Planning Policy Statement and Dundrum Local Area Plan Consistency Statement* prepared by Tom Phillips + Associates, but briefly addressed below.

- Provision of a Masterplan for the lands
- Open space requirement of 25%
- Publicly accessible open space
- Account for site's built heritage and natural assets
- Maintain open character of site
- Consider average net densities of 35-50 units p/ha for Institutional lands (higher densities accepted where it is demonstrated that they can contribute towards retaining the open character and/or residential amenity of the lands)

Compliance with the built heritage, natural assets and density requirements are addressed under their respective sections.

5.3.1 Masterplan Requirement

As also noted throughout this submission, the application site's INST Objective designation and the associated policy requirements under Sections 4.3.1.4 (including Policy PHP21) 12.3.7.10 contained within the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, and the *Dundrum Local Area Plan 2023* requires the preparation of a Masterplan for the lands.

In line with this requirement, a Masterplan has been prepared for the entire former CMH landholding, which involved consultation between DLRCC and the LDA to identify potential future occupants.

The enclosed *Masterplan* provides an overview of the masterplanning process and the supporting assessments.

The Masterplan provides for the comprehensive redevelopment of the entire lands. It forms a strong basis for the delivery of high-quality and sustainable redevelopment of the subject



lands and conveys the development vision for the overall site embedded within urban design principles for density and sustainable design. It provides a firm basis for the development of an accessible, permeable and environmentally sustainable neighbourhood. It takes into consideration the site's unique location and heritage while balancing considerations of affordability, environmental sustainability, biodiversity, development standards and safety, mobility, conservation and placemaking.

5.3.2 Public Open Space Provision and Open Character of Lands (and Landscape Design)

For Institutional lands, the Development Plan requires a minimum open space provision of 25% of the total site area (Section 12.3.7.10). It further requires that the open space provision must be sufficient to maintain the open character of the site and retention of key features.

(For clarity, the total site area in this context is considered to be 9.6 ha to exclude the 0.1 ha area outside the former CMH site, i.e., a portion of Dundrum Road and a portion of St Columbanus Road, both of which are included for the provision of infrastructure and therefore do not constitute part of the development site.)

The proposed design strategy prioritises the provision of open space across the site. The overall provision comprises the following:

Table 5.1: Breakdown of proposed open space provision.

Category of Open Space	Description	Proposed Provision
Public Open Space	Open space that is fully accessible to the public and provides for a range of functions, users and activities.	2.89 ha (30%)
General landscaped areas/ open space	All open spaces provided across the site, including landscaped areas and small green areas/ buffer strips adjacent to built form which contribute to the open character of the lands.	2.89 ha (publicly accessible) and an additional 0.29 ha open visual amenity space. 3.18 ha total (33%)
Communal Open Space	Provided in the form of roof gardens and landscaped courtyards at podium level for the apartment blocks and open spaces at surface level for the duplex units at Blocks 08 and 09.	0.91 ha in total provision.
Private Amenity Space	Provided in the form of balconies, terraces and rear gardens; accessible only for the occupier of the associated units.	Provided in line with the Apartment Guidelines.



As demonstrated in the table above, the proposed development provides 30% public open space, or 33% when considered in the context of the additional green space and landscaped areas that is considered to contribute to the overall open character of the lands. (The enclosed Masterplan identifies that, subject to further planning consent, the public open space will be 3.2 ha or 28% of the former CMH landholding, which is also consistent with policy.)

From a quantum perspective, the proposed development therefore provides a significant amount of open space for both the future residents and the existing local community in line with the relevant policy requirements.

In this regard, we also note the new positive interface between the subject lands and Rosemount Green at this location which is facilitated by the proposed removal of a significant section of perimeter wall. The enhanced permeability in this location will provide for an increased movement and fluidity of pedestrians and cyclists between the two public spaces, providing greater opportunities for a range of users and activities. The proposed open space, together with its connectivity with the existing open space to the south, will significantly enhance the green infrastructure network in the local area.

In terms of the nature of the proposed open space, the landscaping strategy identifies a number of key open spaces/ character areas, including: The Parkland, Central Landscape, Central Square, Walled Garden Landscape, Elm Park Stream Corridor and Rosemount Park.

The landscaping strategy comprises a strong hierarchy of public spaces, ranging from open parkland and a central square to eco-corridors and tree lined areas which foster habitat creation to intimate pockets of space which provide opportunity for quiet/ passive activity. From a placemaking perspective, the variation of open spaces within the development is considered to play a key role in the fostering of a sustainable mixed and balanced community with a variety of recreational needs.

As well as providing significant amenity provision for a range of activities and users, the proposed open space retains the open character of the lands, as well as the special landscape features/ natural assets of the lands, including mature trees, tree lined avenue and the walled garden. As well as fulfilling the policy objective in respect to Institutional lands, this ensures a high-quality response to the redevelopment of the lands in townscape/landscape and visual terms, which is addressed in detail in Chapter 14 of the EIAR.

We note that the proposed development derives from landscape-led masterplanning which, in consultation with the DLRC Parks Department, determined the sensitive and compatible arrangement of built form within an existing mature landscape. This was further refined with reference to the DLAP and through the current Part 10 Application with further engagement with the DLRC Parks Department and the DLRC Biodiversity Officer.

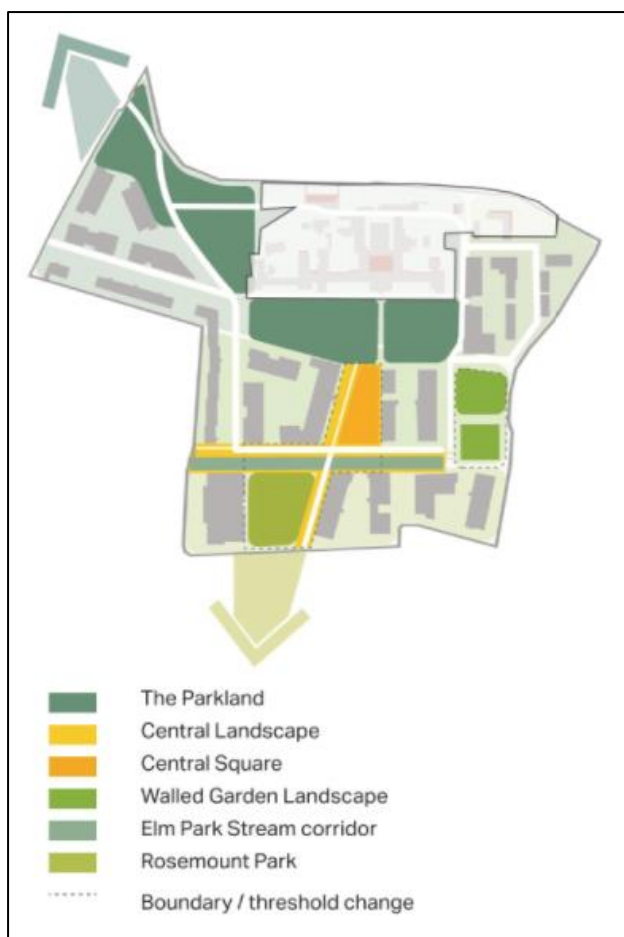


Figure 5.1: Extract from Landscape Architecture and Public Realm Design Report, prepared by Aecom, showing key open areas.

As a result, the proposed public open space has been designed to protect the landscape character of the site whilst ensuring the provision of extensive high quality open space. On this basis, in our opinion, the proposed development provides open space of exceptional quality, unlocks a significant quantum of urban greenery that is currently inaccessible to the public and provides a strong contribution to the green infrastructure provision in Dundrum and the surrounding area.

The relevant policy requirements and development standards in respect of open space and amenity space provision are addressed in full in the *Statement of Consistency including Dundrum LAP Statement of Consistency*.

5.4 Residential Density

The proposed Part 10 development has a gross residential density of 97 no. units per hectare, based on 934 no. units and a site area of 9.6 ha approximately (i.e. excluding the 0.1 ha of the Application site outside the former CMH landholding). The overall Masterplan area (11.39 ha) has a gross residential density of c. 88 no. units per hectare, assuming the eventual development of a total of 1,002 units across the Masterplan lands).

Taking the Part 10 net site area of 6.5 ha into account (excluding public open space provision and a standalone non-residential building, the Gate Lodge cafe), the proposed development will provide a net residential density of 146 no. units per hectare.

The above densities have been calculated in accordance with Appendix B of the *Sustainable and Compact Settlements – Guidelines for Planning Authorities (2024)* which states that a “A gross density measure is best applied to estimating overall land areas required for mixed-use developments or for Local Area Plans and Planning Schemes”.

Appendix B of the above guidelines also references ‘net site density’ as a “more refined estimate than a gross site density measure and includes only those areas that will be developed for housing and directly associated uses”. These guidelines define net density as follows:

Net Site Area Includes	Net Site Area Excludes
<ul style="list-style-type: none"> ● Local Streets as defined by Section 3.2.1 DMURS. ● Private and semi-private open space. ● Car parking, bicycle parking and other storage areas. ● Local parks such as neighbourhood and pocket parks or squares and plaza's ● All areas of incidental open space and landscaping. 	<ul style="list-style-type: none"> ● Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS. ● Lands used for commercial development (inc. retail, leisure and entertainment). ● Lands for primary schools, churches and other community services and facilities. ● Larger, Regional or District Parks, Wayleaves or rights of way. <p>Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.</p>

Figure 5.2: Extract from Compact Settlement Guidelines, 2024.

The Compact Settlement Guidelines also state in respect of net density:

“A net density is the most commonly used approach in allocating housing land within Local Area Plans and Planning Schemes and is appropriate for development on infill sites where the boundaries of the site are clearly defined and where only residential uses are proposed. It is also appropriate where phased development is taking place in a major development area (perhaps spanning different plan periods) and individual housing areas have been identified. All densities quoted in these Guidelines are net densities.

When calculating residential densities within mixed use schemes, planning authorities shall exclude the % of non-residential uses in proportion to the net site area, i.e.

- Calculate Net Site Area
- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwelling by reduced site area”.



Table 5.2: Net Density Calculation

Calculation	Figure
Calculate Net Site Area	6.7 ha
Calculate the overall GFA	93,980 sq m (excludes the 78 sq m café which has already been omitted in identifying the net site area)
Differentiate between the % of residential and non-residential GFA	89,678 sq m residential (95.4%) 4,302 sq m non residential (4.6%) (note the 78 sq m café is already excluded)
Reduce net site area by the percentage of non-residential GFA	6.4 ha
Divide number of dwelling by reduced site area	146 uph net

*It should be noted that this methodology differs from that used in the previous SHD Application which was lodged prior to the publication of the *Compact Settlement Guidelines, 2024* and the publication of the above methodology and the net density figures between the two Applications are therefore not directly comparable.

For ease of reference, the various density calculations are set out again below:

Table 5.3: Density calculations.

Density Measure	Density (u/ph)
Masterplan Gross	88 units p/ha
Part 10 Gross	97 units p/ha
Part 10 Net	146 units p/ha

Referring to the policy objectives surrounding residential density, we reiterate that the Development Plan states that it is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of the areas with the need to provide for sustainable residential development.

We further note that the Development Plan seeks minimum residential densities of 35 u/ph. For sites with high public transport accessibility, the Development Plan requires higher densities at a minimum of 50 units per hectare, which is referenced in the context of the *Sustainable Residential Development in Urban Areas Guidelines, 2009*. However, those 2009 Guidelines have since been superseded by the *Compact Settlement Guidelines 2024*, which identify appropriate residential densities depending on location and accessibility.

Table 3.1 of the *Compact Settlement Guidelines* provide that ‘City - Urban Neighbourhoods’, which includes strategic and sustainable development locations and lands around existing or planned high-capacity public transport nodes or interchanges within the city and suburbs area, should have a net density in the range of 50-250 dwellings per hectare in Dublin and Cork. The *Compact Settlement Guidelines* also note that density should be refined having regard to local character, amenity and the natural environment, such considerations include historic settings and impact on the environment.



We further acknowledge the Development Plan's Institutional designation of the subject lands and the specific policy requirements that accompany this designation. Policy PHP21 policy which relates to the Development of Institutional Lands notes (as detailed within the *Statement of Consistency including Dundrum LAP Statement of Consistency*) that where such lands are proposed for redevelopment, it is Council policy to retain the open character and/or recreational amenities of these lands. The overriding policies in relation to development on Institutional lands include the preservation of the open character of the lands and the retention of existing features such as trees, boundary walls and other features.

Where INST objective lands are to be developed, PHP21 requires:

- *"A minimum of 25% of the entire INST land parcel, as determined by the Planning Authority, will be required to be retained as accessible public open space. In determining the area to which the "INST" objective applies the planning authority shall have regard to the existing and historical land use and associations between land uses, and the extent to which any lands contribute to the open character and setting of the core institutional function.*
- *This provision must be sufficient to maintain the open character of the site with development proposals structured around existing features and layout, particularly by reference to retention of trees, boundary walls and other features as considered necessary by the Council (refer also to Section 12.3.7.10).*
- *The provision must be sufficient to maintain and/or improve the recreational value of the site particularly with regard to adding to the sustainable neighbourhood infrastructure of the area.*
- *Any proposal for development other than that directly related to an existing social infrastructure and/or institutional uses, will require the preparation and submission of a masterplan.*
- *Average net densities should be in the region of 35 - 50 units p/ha. In certain instances, higher densities may be permitted where it can be demonstrated that they can contribute towards the objective of retaining the open character and/or recreational amenities of the lands."*

The scheme is designed to retain the open character of the site and key features of the site including the retention of many mature trees (particularly those around the existing entrance and main hospital building); a significant area of open space to the front of the main hospital building; the walled garden, the majority of the boundary wall, and historic structures. These features include those identified in the indicative urban form of the site in the DLAP. The accessible public open space measures 2.89 ha or 30% of the site area.

The proposed development also provides for sustainable neighbourhood infrastructure including a childcare facility, medical centre, and a 1,749 sq m community facility, in addition to contributing to the recreational value of the site through the provision of a substantial area of public open space (30% of the site area in the Part 10 Application). The proposal also facilitates a direct connection between the site and the adjoining Rosemount Green.

The proposed net density is permissible in our opinion as the concentration of development in certain parts of the site, and the absence of development in other parts of the site, contributes towards the objective of retaining the open character and recreational amenities of the lands by facilitating the provision of c. 30% of the site area as publicly accessible public open space.



The concentration of development in certain parts of the site ensures the proposal of appropriate and sustainable density (in line with wider policy objectives) whilst delivering significant planning gain to the area in the form of public open space which also retains the open character and recreational amenity of the lands. The scheme also contributes to the sustainable neighbourhood infrastructure in the area.

Furthermore, the Dundrum LAP 2023 provides for increased net densities at the former CMH site where certain parameters are met:

“Policy DLAP17 – Residential Density:

It is Policy to promote and support residential densities in line with Policy Objective PHP 18 of the County Development Plan 2022 – 2028 (or any subsequent Plan). High density proposals should ensure a balance between the protection of existing residential amenities and the established character of the surrounding area. On the CMH and OSCS where net densities in excess of 80 u/p/h are being sought any application must demonstrate the following:

- *Provision of adequate social and community infrastructure.*
- *Appropriate design response that considers the characteristics of the site, any development constraints and prevailing character.*
- *Appropriate mix of uses and housing typologies.*
- *The provision of high quality public open space and public amenities.”*

From a design perspective, we consider that the site-specific assessments that support this planning application demonstrate the appropriateness and acceptability of the residential density proposed. In this regard, despite the higher net density proposed, the proposed development is considered to deliver an exceptionally high development. These considerations are summarised below:

- The proposed development includes a range of social and community infrastructure which will benefit the new population and existing neighbourhoods.
- The design of the scheme responds to the characteristics of the site and has been arrived at after an iterative design process, including significant consultation, adherence to the provisions of the DLAP and detailed review of the site’s planning history.
- The mix of uses provides a range of facilities for residents of the scheme and adjoining lands, the housing typologies will cater to a range of household types.
- The scheme provides access to a significant area of high quality public open space, providing public access to this large site for the first time, which will, in addition to the community facility, benefit public amenities in the area including recreation.
- The standard of residential accommodation proposed is of a high quality with excellent levels of daylight and sunlight to the vast majority of the proposed units, per the

enclosed *Daylight & Sunlight Internal Daylight, Sunlight And Overshadowing Report*, prepared by GIA.

- The concentration of development in parts of the site is achieved without giving rise to unacceptable impact upon neighbouring residential amenity. For example, in this regard, the *Daylight and Sunlight – Impact on Neighbouring Properties Report*, prepared by GIA, demonstrates that 99% of the windows satisfy the target values contained within the BRE Guidelines when assessed against the Vertical Sky Component (VSC).
- The Landscape/ Townscape Visual Impact Assessment concludes that the proposed development is considered to be appropriately designed to integrate a higher intensity and scale of residential development into the surrounding matrix of predominantly mid-low density residential housing estates. It further states that where impacts are negative, they tend to be in the mid to low range and of a localised nature, whereas effects tend to be more pronounced but positive where the design approach is more readily apparent.

5.5 Design Strategy

The proposed development has been subject to an iterative design process, underpinned by a detailed masterplanning process for the entire lands. As a result, the proposed design strategy responds to a multitude of site-specific characteristics, constraints and opportunities and ensures an optimal design solution for these strategically important lands.

The design strategy seeks to maximise the delivery of residential (and supporting non-residential) development while responding to the specific policy requirements associated with Institutional lands, including the maintenance of the site's open character, which essentially provides design parameters for the lands.

In our view, the proposed scheme strikes an appropriate balance between the delivery of housing and compact growth, as required by national and regional policy, and the DLAP, and a sensitive response to the existing built and natural heritage that characterises the lands.

The masterplanning and design detail are set out in depth in the enclosed *Masterplan Report* and *Architectural Design Report*.

5.5.1 Building Height

The proposed development ranges between 2 and 8 storeys in height (including Lower Ground Floors at Blocks 02 and 10, and Basement Levels at Blocks 03 and 04) and has been designed to sensitively respond to the site's heritage buildings, the surrounding neighbouring development and the Institutional objective policy requirement to retain the open character of the lands.

The lower building heights are located towards the edge of the site, contributing to a sensitive transition between the surrounding existing development, which is predominantly two storey in height, and the proposed 8 storey building located at the centre of the site at Block 03.

Section 2.8.5.2 of the DLAP states that heights provided for in the non-statutory Masterplan included with the SHD Application for the former CMH lands was generally satisfactory and that:

“Some tweaking of height in perimeter block layouts, such as increasing the height of centrally located blocks which run north south and lowering southern perimeter blocks that run east west could result in more daylight and sunlight internally in apartments and also in the central communal amenity spaces. Taller blocks could be located further away from the protected structures.” [Our emphasis.]

Objective CMH10 also states:

“Heights shall be sensitive to adjoining areas and shall generally range from 3 to 7 storey. Elements in excess of 7 storeys may be provided at the ‘Designated location of Height’ shown on figure 2.18.”

Under the current proposal the central blocks running north south are 7 storeys (Block 7) and 8 storeys (Block 3) in height, which is consistent with the LAP guidance allowing heights over 7 storeys in height at the centrally located blocks. In Blocks 3 and 7 where the height has been increased these are the most central blocks and are also furthest away from any existing neighbouring properties which are all residential dwellings and by and large are low rise. Block 3, the only 8 storey element, is set further back from the Protected Structure than the equivalent Block in the previous Planning Application (66m setback from the central door of the main hospital building compared to 59m in 2022; and 64m set back from the eastern wing compared to 57m in 2022), with a large open space and mature trees in the intervening space.

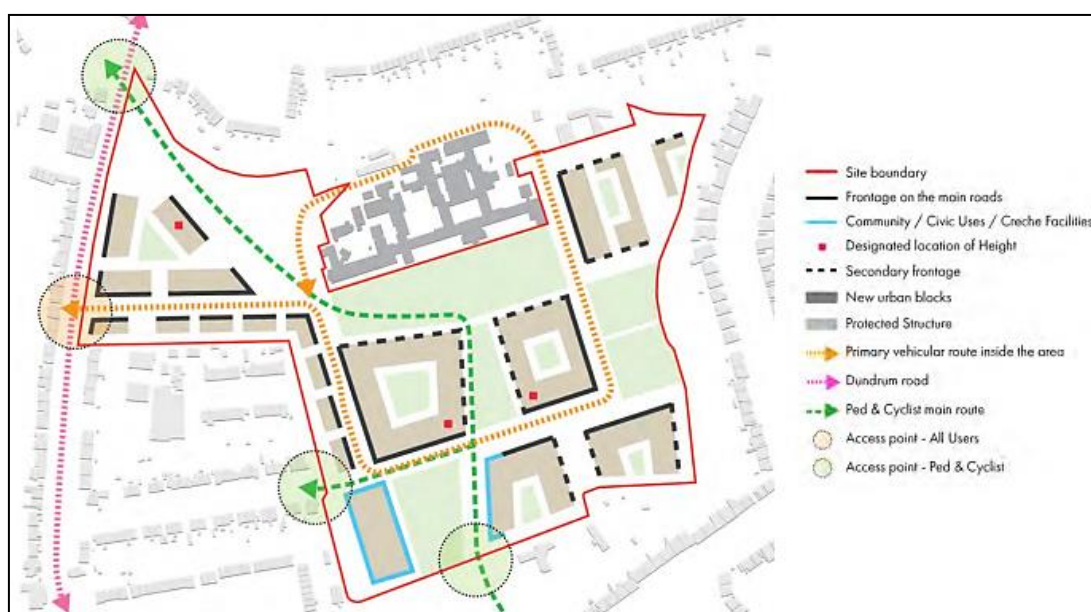


Figure 5.3: Extract from Figure 2.18 of the *Dundrum LAP 2023* showing the indicative urban form for the CMH site.



Thus, whilst Figure 2.8 of the DLAP identifies two points as ‘Designated location of Height’ (red squares at the southern end of the central blocks), the text of the LAP clearly refers to “*increasing the height of centrally located blocks which run north south*”.

In other words, the entirety of the centrally located blocks running north south can have increased height and not just the southern ends of those two blocks, as might be interpreted from the graphic.

It is a widely accepted principle that where there is any perceived discrepancy between the text and maps accompanying Statutory Plans, the text supersedes the graphic/mapping. For example, the Development Plan (Section 1.4.1) confirms that the Written Statement takes precedence over mapping:

“In the event of any conflict or ambiguity between what is contained within the Written Statement and the supporting maps, the Written Statement will take precedence.”

Furthermore, from a townscape and visual impact perspective, the enclosed Townscape and Visual Impact Assessment (TVIA) (contained at Chapter 14 of the EIAR) concludes that the proposed development, through the introduction of new mid to large scale buildings, together with the changes to the wider landscape/ open space, would result in a substantial physical change to the lands in townscape and visual terms. Positively, the TVIA acknowledges the retention of key site features, for example, the main heritage buildings, the walled garden and the mature trees (in their majority). In terms of the relationship of the proposed development with the surrounding area, the TVIA states that the currently completely insular site will be transformed into a modern, outwardly bold, high density residential development. It then goes on to conclude that the townscape impact of the development is deemed to be moderate/ positive.

In conclusion, the proposed building height strategy is considered to reflect a balance between the delivery of significant housing provision, in line with the mandate of both DLRCC and the LDA, and a sensitive response to the Institutional status of the lands and the associated policy requirements. This is further juxtaposed with the presence of both heritage and natural assets which has significantly influenced the site layout and height strategy, including the concentration of built form in particular locations across the site so as to carefully manage the interface between new built form and the heritage buildings.

Thus, we consider that the proposed development is consistent with the heights set out in the LAP. The enclosed *Statement of Consistency including Dundrum LAP Statement of Consistency*, the proposed development complies with SPPR3 of the Building Height Guidelines, as well as aligning with Dún Laoghaire-Rathdown’s Building Height Strategy, including Policy Objectives BHS1 and BHS2.



5.5.2 Relationship with Neighbouring Development

In their current use, the subject lands are largely disconnected from the surrounding area, with the large perimeter walls being the main interface between neighbouring development and the site. The nature of the perimeter wall, the lack of built form within the site and the extensive open space is considered to result in very little impact, from a residential amenity perspective, upon adjacent neighbouring development. In fact, the subject lands, as existing, are insular and largely unintegrated into the surrounding area. As noted by the TVIA, the proposed development will result in a modern, outwardly bold, high density residential development.

As a result, it is acknowledged that the proposed development will give rise to a change in the way that neighbouring development experiences the subject lands. In terms of potential impact arising, we have given careful consideration to the impact of the development upon neighbouring amenity and sought to minimise the potential for such impacts throughout the masterplanning and Part 10 design process.

Daylight, Sunlight and Overshadowing

In terms of daylight, sunlight and overshadowing impact upon neighbouring development, the proposed development has undergone detailed daylight, sunlight and overshadowing assessment in respect of its potential impact upon surrounding residential amenity in this regard. Refer to *Daylight and Sunlight – Impact of Neighbouring Properties Report* (with an appended *Transient Overshadowing Assessment*) prepared by GIA.

From a daylight perspective, GIA assessed 1099 no. windows across 155 no. neighbouring properties. When assessed against the Vertical Sky Component (VSC), 99% of the windows satisfy the target values contained within the BRE Guidelines, 2022. From a sunlight perspective, GIA tested 641 no. windows that face within 90 degrees due south of the development site in line with the Guidelines. When assessed against Annual Probably Sunlight Hours (APSH), 99% of the windows satisfy the BRE Guidelines 2022 target values.

Furthermore, GIA undertook a Transient Overshadowing Study (TOS) to demonstrate the overshadowing impact of the proposed development on surrounding neighbouring development. Although a qualitative assessment, it is clear from the imagery that any overshadowing to neighbouring properties is “*generally brief and insignificant*”.

We therefore conclude that a detailed and robust assessment has been undertaken in respect of potential impact in relation to daylight and sunlight. We further conclude that it has been demonstrated that the proposed development will not give rise to unacceptable impact upon the receiving environment in this regard. Refer to the *Daylight and Sunlight – Impact of Neighbouring Properties Report* and accompanying appendices for full details of the assessment and results.

Overbearing

The proposed height strategy adheres to the DLAP guidance and good design principles by locating higher buildings at central locations, with heights decreasing to the boundaries. This approach is considered to reduce any perceived potential overbearing impacts associated with the proposed development.

Notwithstanding this, we note that a sense or experience of ‘overbearingness’ is subjective and therefore difficult to quantify for assessment purposes. Nevertheless, in our view, the proposed separation distances and height strategy mitigate concerns in this regard. This is further evidenced by the positive daylight, sunlight and overshadowing assessment in respect of the impact of the proposed development upon surrounding neighbouring development. The conclusions of the TVIA are also considered to support this.

We further highlight the presence of the perimeter wall at 4-5 metres in height which will largely remain in situ with the proposed development in place, with the wall being removed or reduced in height in selected locations where new structures are not proposed in proximity to existing buildings. In our view, the proposed height strategy (which tapers towards the site boundary) together with the retention of the perimeter wall (which will continue to provide a visual boundary) will ensure that neighbouring two storey properties are not immediately adjacent to significantly taller buildings. The siting of increased height towards the centre/less sensitive locations of the site is considered to provide a sense of visual relief for neighbouring development.

Overlooking

The scheme design intends to minimise the amount of potential overlooking arising from the proposed development, mitigating features such as generous separation distances between the taller buildings within the scheme and neighbouring development, it is considered that the proposed development will not give rise to unacceptable adverse impact in relation to overlooking. Refer to the *Architectural Design Report* (Section 3.6) for a series of illustrative maps and visualisations which demonstrate that the proposed development is acceptable in this regard.

5.6 Built Heritage

The Part 10 application boundary excludes the protected structures due to the reasons outlined in Section 1.3 of the Report. The proposed development however sits within the immediate setting and curtilage of the protected structures, namely the ‘Asylum’ (RPS No. 2072), the ‘Catholic Chapel’ (RPS No. 2071) and the ‘Hospital Building’ (RPS No. 2073). The below Figure 5.2, an extract from the Development Plan Mapping, illustrates the extent of protection (shown in yellow).

We note that the Masterplanning exercise, which includes for the redevelopment of the entire former Central Mental Hospital lands, ensures a holistic approach which gives careful consideration to the interface between the site’s heritage assets, the historic landscape and the proposed new built form. Refer to the *Masterplan Report* for further details.



Figure 5.4: Extract from *Dún Laoghaire Development Plan 2022-2028* showing extent of protected structures at the Central Mental Hospital lands.

Within the wider site boundary, the following heritage features have been identified:

1. The Perimeter Wall
2. The Main Hospital Building complex including ancillary buildings
3. The Gate Lodge
4. Open Paddocks
5. Historic Landscape
6. Walled Garden



Figure 5.5: Extract from Alastair Coey's Architectural Heritage Assessment contained within Chapter 17 of the EIAR.

Whilst the proposals do not propose direct intervention in respect of the Protected Structures, the proposal includes works to a number of buildings/ structures that are identified as having heritage value by Alastair Coey Architects in their Architectural Heritage Assessment (Chapter 17 of the EIAR), (and the *Historic Landscape Statement of Significant & Impact Assessment*) including the perimeter wall.

The design strategy and Masterplan proposal had regard to the setting of the Protected Structure sought to reduce the potential impacts upon the architectural heritage within the site boundary. This includes the setting of reduced heights within the immediate setting (Block 2) of the Main Hospital Building so that the hospital retains its dominance and the retention of the historic landscape to the immediate south of the Main Hospital Building.

In terms of the perimeter wall, the Assessment notes some potential impacts arising from the removal of substantial sections, but acknowledges the sensitive nature of the proposed interventions, as well as recognising the important role that the removed sections play from a permeability, connectivity and sustainable mobility perspective.

The proposed development also includes works to the Gate Lodge which facilitates a change of use from its existing reception use to a café. The works involve the removal of non-original features and a conservation-led refurbishment which are considered to result in a significantly beneficial impact.



Refer to the following documents for full details surrounding built heritage and assessment of potential impacts:

- EIAR Chapter 17 'Architectural Heritage', prepared by Alistair Coey Architects
- *Historic Landscape Statement of Significant and Impact Assessment*, prepared by Alistair Coey Architects
- *Gate Lodge Condition Report*, prepared by RAU
- *Perimeter Wall Survey Report*, prepared by Alistair Coey Architects

In summary, the proposed development will result in a significant degree of change to the Central Mental Hospital lands which inevitably, given the sensitivity of the site, will give rise to impacts of varying degrees across the various assets. Nevertheless, and as recognised by the Architectural Heritage Assessment (Chapter 17 of the EIAR), the proposed design strategy ensures sensitive intervention and ultimately balances the need to protect the heritage assets and the requirement to deliver a significant quantum of affordable housing. In our view, the proposed development results in a positive interface between new and old, and provides a high quality contribution to addressing housing need.

5.7 Residential Development

As set out in relation to the strategic planning context in Section 2.6 of this Report, the proposal seeks the redevelopment of strategically important lands in the context of housing need and delivery. The proposed development will deliver 934 no. units at a net residential density of 146 units per hectare (per the Compact Settlement Guidelines methodology) on brownfield, serviced lands which are well-connected to public transport. Therefore, as detailed in the *Statement of Consistency including Dundrum LAP Statement of Consistency*, the proposed development aligns with national and regional policy objectives and guidelines pertaining to housing delivery, compact growth and sustainable development.

The proposed housing mix is considered to contribute to the delivery of a mixed and balanced community and responds to an existing prevalence of low-density housing in the surrounding area. In alignment with the *Apartment Guidelines*, the scale and nature of the proposed apartment development is considered appropriate in the context of the site's locational characteristics from a public transport accessibility perspective. In this regard, the classification of the lands as a Central and/ or Accessible Urban location throughout this planning application submission is owed to the proximity of the site to a number of significant employment locations, the Windy Arbour Luas Stop and a range of bus stops/routes serving key destinations. Under the *Compact Settlement Guidelines*, the subject site is characterised as a City - Urban Neighbourhood on the basis it is located within an LAP (a strategic and sustainable development location), which again is an appropriate location for residential development at an increased net density.

Importantly, we highlight that the proposed development will deliver an 100% social and affordable housing scheme, whereby 19% of the units will be social housing units for DLRCC (rather than 10% social housing as would normally be required) and the remaining 81% will be delivered as affordable housing under the *Land Development Agency Act 2021*. From a housing delivery perspective, this is considered to constitute a significant public benefit.



The scale of the proposed development, particularly in relation to height and density, is considered appropriate in design terms as well as from a locational perspective. The development is considered to optimise the delivery of housing from a quantum perspective whilst providing a high standard of residential accommodation. This is demonstrated in detail in the *Housing Quality Assessment Report* which confirms full compliance with the Apartment Guidelines.

The quality of residential accommodation provided is further evidenced by the *Internal Daylight, Sunlight and Overshadowing Report* which states:

“In relation to daylight, the overall performance of the scheme is excellent with 2380 out of the 2610 tested rooms (91%) meeting or exceeding the recommended targets identified in the ‘BR209, 2022’ Appendix C, and the ‘BS EN 17037:2018’ National Annex. This figure considers the higher recommendation of 200 lux for large combined living/kitchen/dining rooms (LKDs) but it increases to 96% should 150 lux (suggested for living rooms) be considered acceptable as is common in urban developments and also endorsed in the recent edition of the BRE Guidance (BR209, 2022’) Appendix C. Full details on the daylight performance of the scheme can be found in section 05 of this report.

For sunlight, 789 (85%) of all proposed dwellings will have at least a south-facing window and all of these will achieve at least 1.5 hours of sunlight on the 21st March, which is the recommended date by the BRE Guidelines for this assessment.”

Reliance on the targets identified in the 2022 BRE Guidelines and the UK National Annex is supported by reference to Sections 6.5-67, *Apartment Guidelines 2023*:

“The provision of acceptable levels of natural light in new apartment developments is an important planning consideration as it contributes to the liveability and amenity enjoyed by apartment residents. In assessing development proposals, planning authorities must however weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision with the location of the site and the need to ensure an appropriate scale of urban residential development.

Planning authorities should avail of appropriate expert advice where necessary and have regard to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN 17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context, when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision.

Where an applicant cannot fully meet all of the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment of specifics. This may arise due to design constraints associated with the site or location and the balancing of that assessment against the desirability of achieving wider planning



objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

In addition to Section 5.3.7 of the *Compact Settlement Guidelines 2024*:

“In cases where a technical assessment of daylight performance is considered by the planning authority to be necessary regard should be had to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.

In drawing conclusions in relation to daylight performance, planning authorities must weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”

No Irish equivalent of the UK National Annex, specific to the Irish context, has been issued to date.

As set out in detail above, the open space provision, given its quality and quantity, is considered to contribute to the overall standard of residential accommodation and therefore play a pivotal role in the delivery of successful placemaking.

5.8 Sustainable Mobility

The Applicant, as a Local Authority, and the Applicant’s partner LDA a state sponsored body, is committed to delivering a low carbon development with the emphasis on sustainable travel modes and reduced private car dependency in line with the strategic objectives of the National Planning Framework.

The locational characteristics of the subject site, in the context of public transport accessibility and significant employment locations, is considered to support the provision of reduced car parking and emphasis on sustainable travel.

In addition to the location of the lands, the nature and characteristics of the proposed development is considered to encourage and support the use of sustainable modes of transport and minimise reliance on car use, including through the provision of non-residential local services and facilities, removal of sections of perimeter wall to provide enhanced permeability between site and surrounding area and the internal site layout and proposed pedestrian and cyclist connections.



Full details of the transport proposals and assessment is contained within the *Traffic and Transport Assessment & Mobility Management Plan*. However, an overview of the transport related proposals is provided below.

5.8.1 Pedestrian and Cyclist Connections and Permeability

The proposed development includes a number of new pedestrian and cycle links which provide connection between the subject lands and the surrounding area. Given the current insular nature of the lands, the proposed connectivity results in a significant enhancement to permeability in the local area. In summary, the proposal includes the following new cycle and pedestrian access points:

- Formation of a new opening in perimeter wall at Annville Grove to provide a pedestrian and cyclist access.
- Removal of sections of wall adjacent to Dundrum Road, including the provision of a new vehicular, cyclist and pedestrian access.
- Removal of section of perimeter wall adjacent to Mulvey Park to provide a pedestrian and cyclist access.
- Removal of section of perimeter wall adjacent to Rosemount Green to provide cycle and pedestrian connectivity.

Refer to the *Architectural Design Report* provides an illustrative site plan showing the proposed pedestrian and cycle links.

As required by the *Dundrum Local Area Plan 2023*, an active travel (cycle and pedestrian) route is provided from the northwest side of the site through the site to the boundary of Rosemount Green. DLRCC will facilitate the extension of the active travel route to Larchfield Road as part of overall improvements to the interface between the subject site and Rosemount Green. This strategic new link significantly augments the existing and planned pedestrian and cycle network in the area. It provides new connections for existing communities as well as the new planned community and will promote sustainable travel in the area. In addition, it links with the existing pedestrian/cycle crossing on Dundrum Road and provides access to low volume traffic routes to the north and south of the subject lands. This additional strategic link through the proposed development represents a significant contribution to the local mobility.

From a pedestrian connectivity perspective, ILTP provide an illustrative diagram within their *Traffic and Transport Assessment & Mobility Management Plan* which shows the significant improvement of the pedestrian walking catchment as a result of the proposed links (provided in the Figure below). This extract shows that with the implementation of the proposed internal infrastructure, the 15-minute walking catchment (shown in blue) would significantly increase to the east and south of the subject lands particularly. This very significant increase in catchment will further promote the use of walk and cycle modes for the new development and importantly benefits the existing community by providing shorter walk and cycle route.

It further illustrates the improved walking catchment in the context of surrounding public transport, including the Luas line and stops and bus stops. The illustrative map demonstrates that the introduction of the proposed pedestrian and cycle access points will improve access to public transport, particularly, bus stops on Goatstown Road.

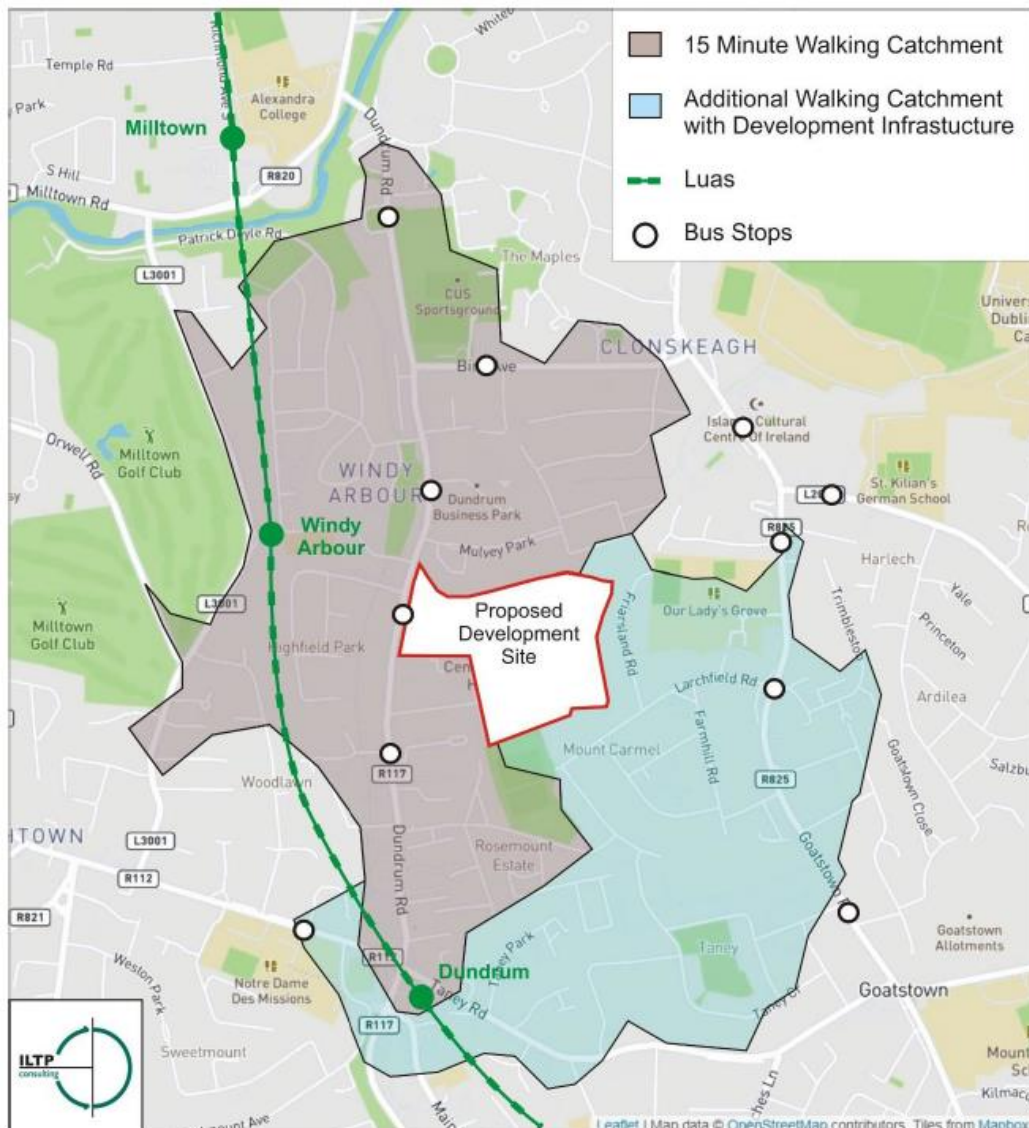


Figure 5.6 Extract from ILTP’s Figure 4.5: Walking Catchments (15 minutes) Without and With Proposed Development

5.8.2 Vehicular Access and Movement Strategy

The development of a movement strategy for the Part 10 and Masterplan proposal has been very carefully considered by DLRCC, the LDA and Design Team. The proposal builds on the planning history of the site, the DLAP and consideration of the site’s context.

The proposed development provides for a new vehicular access point onto Dundrum Road. As per a Condition attached by the Board to the previous SHD permission, the existing entrance will be used for pedestrians, cyclists and emergency vehicles only.



5.8.3 Reduced Car Parking

The *Planning Policy Statement and Dundrum Local Area Plan Consistency Statement* provides a full assessment of the proposed residential car parking provision against the relevant Development Plan standards, the *Apartment Guidelines, 2023* and the *Compact Settlement Guidelines, 2024*. We confirm that the residential car parking aligns with the provisions for reduced car parking contained within both the Development Plan and the Guidelines.

The proposed development has been designed to minimise reliance on car use and encourage and support the use of sustainable modes of transport. In summary the proposed residential car parking ratio is considered to be both appropriate and acceptable for the following reasons:

- The locational characteristics of the site in the context of public transport, significant employment locations and local services and infrastructure (education, retail, leisure etc.);
- When considered against the Apartment Guidelines, the site is considered to be a Central and/or Accessible Urban location and is therefore, deemed to be an appropriate location for higher density apartment development with reduced car parking;
- When considered against the Compact Settlement Guidelines SPPR3, as a site within an Urban Neighbourhood of Dublin, the site is an appropriate location whereby “*car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling*”;
- The specific characteristics of the proposed development which is mixed use in nature, provides local services and facilities thus reducing the need to travel, provides significant amenity, including connection into existing public open space;
- The wider characteristics of the Masterplan which includes the delivery of employment floorspace at the site;
- The design of the internal street layout and the provision of cycle and pedestrian connectivity through the site has been designed to promote sustainable travel patterns for both the existing and new community and has resulted in reduced walking times from the site to key destinations such as Dundrum Town Centre;
- The measures contained within the Mobility Management Plan, including Car Share;
- The proposed car parking management strategy which ensures the centralised management of car parking/ allocation to avoid inappropriate overspill into the surrounding network;

Having regard to the factors set out above, we consider that the characteristics of the application site and proposed development lend themselves to reduced car parking provision. We therefore confirm that that proposed parking provision is acceptable in line with the



national policy objectives and guidelines relating to sustainable travel modes and reduced dependency on car.

5.9 Landscaping and Natural Assets (including trees)

Further to the discussion surrounding public open space in Section 5.3.2 of this Report, we provide an overview of the landscape proposals below. We note that the proposal is set out in detail in the *Landscape Design Report* prepared by Aecom.

Firstly, we highlight that the existing landscape at the site, due to its heritage value and overall open character, formed a strong basis for a landscape-led masterplanning process, which in turn informed the DLAP, and the site layout as currently proposed. As set out in the Architectural Heritage chapter of the EIAR, the *Historic Landscape Statement of Significant & Impact Assessment* and the *Landscape Design Report*, the character of the existing landscape embodies both the historical and recent function of the Central Mental Hospital, as a former mental health facility whereby the landscape was considered to play an integral role in recovery and rehabilitation.

In addition to responding to the Institutional objective contained within the Development Plan which seeks to ensure that the open character of the lands is maintained, the architectural and landscaping proposals have been designed to respond to the site's history and enhance the associated character.

For example, as noted in the *Landscape Design Report*:

- The developed landscape will retain and protect existing mature trees onsite (where possible). A central parkland retaining the most valuable mature trees on site will provide a key amenity reflecting the historic parkland of past.
- The existing walled garden will be retained and enhanced through the development.
- Existing and historic vistas through the site will be re-established through the design of the open space and architecture, providing a sympathetic green framework through the development.
- The landscape planting will contribute to achieving tranquillity and biodiversity.

The wider aims and objectives for the landscape proposal relate to recreation, environment, education, culture and leisure which is considered to be reflected in the key open spaces proposed across the site (as depicted below) which provide for a range of functions, activities and users, including:

- Historic Trees
- Central Square
- Community Park
- Central Parkland
- Walled Garden
- Elm Park Eco Corridor

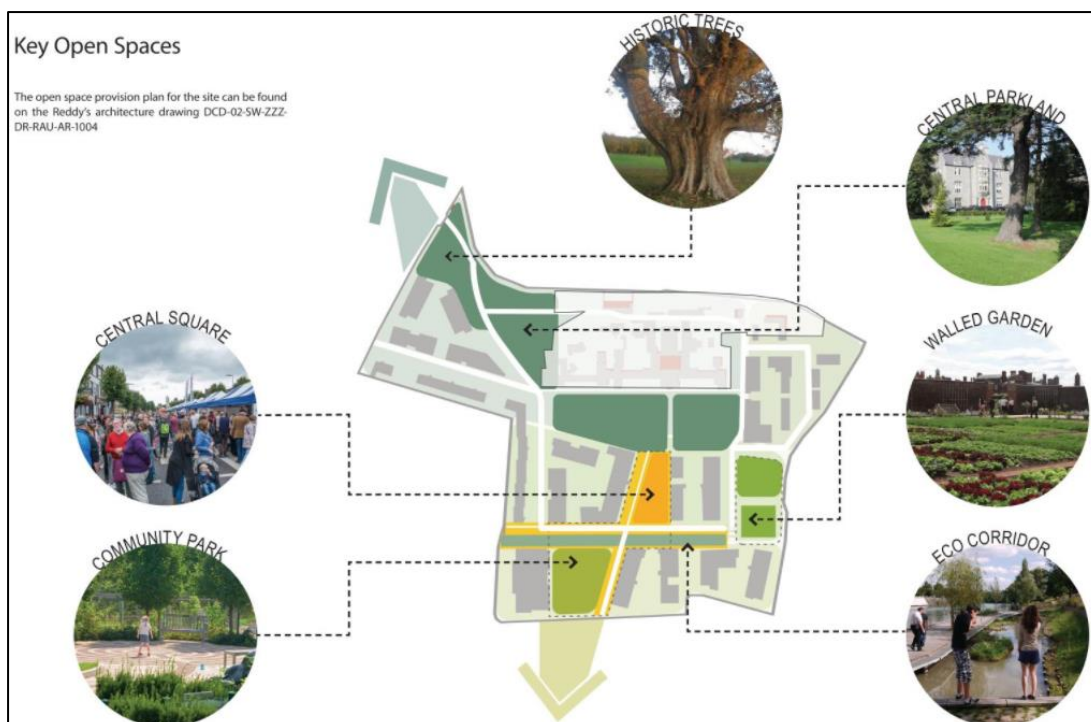


Figure 5.7: Extract from the *Landscape Design Report* prepared by Aecom, showing the key open spaces proposed.

The *Landscape Design Report* provides a description of each of the key open spaces that form part of the landscape strategy for the development. It is clear that the proposal provides an appropriate hierarchy of open space which provide for high quality, varied, inclusive and accessible spaces. In our opinion, the nature of the proposed open spaces place the community (new and existing) at the heart of the development while ensuring that the open character of the lands is protected and key natural assets retained, including the walled garden and existing mature trees.

In addition to the delivery of new and varied public open spaces, the proposed development connects into the existing green infrastructure in the surrounding area via Rosemount Green to the south. This new positive interface between the subject lands and Rosemount Green is facilitated by the proposed removal of a significant section of perimeter wall which enhances permeability at this location and provides for an increased movement and fluidity of pedestrians and cyclists between the two public spaces, providing greater opportunities for a range of users and activities. The siting of the proposed community facilities at this location further strengthens the function of the community park as an inclusive and accessible space.

From an ecological perspective, the proposed Elm Park Eco Corridor will provide an important habitat corridor on site which will build upon existing features including semi-mature trees, a drainage ditch and wet grassland. The proposal includes additional planting and two areas of wetland habitat which has the potential to benefit a wide variety of plant and animal species including bats, frogs, newts and a variety of insects. In addition to this, other habitats that will be created through the open space include:

- Open bonded brickwork within detailing of infrastructure allowing for bat roosting.
- Bird and mammalian nest boxes throughout the open public space.



- Log piles simulate fallen trees and are valuable habitat for mosses, lichens and fungi, as well as many insects through the wetlands and extensive green roofs; and
- Crushed aggregate pathways along secondary pathways allows water to permeate naturally through the soil, without the need for drainage and associated infrastructure.

Badgers have been identified at the subject site, including a breeding sett, and were the subject of consultation with the NPWS DAU section. The breeding sett is to be retained but in addition the construction of an artificial badger sett in the walled garden is proposed to mitigate potential effects on badgers as per consultation with the NPWS.

In this regard, this application is also supported by a *Habitat Management Plan*, prepared by Altemar Ltd., enclosed as Appendix 8.9 of the EIAR, which ensures that the maintenance and enhancement of landscape elements, prevents the introduction of invasive species, maintains biodiversity elements of the core biodiversity habitats, prevents the deterioration of the habitats and monitors the impacts of the habitat management practices.

The proposed development includes an extensive network of SuDS measures which as well as contributing to stormwater management, provides significant enhancements from a biodiversity perspective. The SuDS strategy is depicted in Figure 5.6 below and comprises the following measures:

- Green/Blue Roofs
- Integrated Constructed Wetland
- Raingardens/ Bioretention Pits
- Permeable Surfacing
- Swale

Refer to the engineering documents for full details surrounding the SuDS proposals from a drainage and stormwater management perspective.



Figure 5.8: Extract from the *Landscape Design Report* illustrated the proposed SuDS strategy.

In terms of play provision, the extensive open space network proposed provides for a broad variety of play and play spaces, both formal and informal. There are two designated playgrounds located to the north of the site and in the community park in the south of the site with local play opportunities for residents within the communal podium spaces. There are further informal play opportunities throughout the site.

We therefore conclude that the proposed development is of exceptional quality from a landscaping perspective, both in respect of the quantity of open space provided and the quality of the detailed proposals. From an amenity perspective, the landscaping strategy provides significant benefit to the new and existing community; it will make a significant contribution to the green infrastructure network in Dundrum as well as providing new distinct open spaces that provide for a range of users and activities. The proposed hierarchy of open space ensures characterful spaces that are inclusive and accessible to the wider local community, further enhanced by the provision of increased site permeability in the form of new pedestrian and cyclist links into surrounding lands. The proposed landscape strategy is synonymous to the requirement to maintain the open character of the lands in association with the Institutional objective contained within the Development Plan. As further discussed in Section 5.3.2 of this Report, the significant quantity of public open space proposed, coupled with the integration of the existing historic landscape into the landscape proposals and architectural scheme is considered to protect the open character of the lands and enhance the site's heritage and natural assets. As demonstrated above, the landscaping proposals are also designed to provide for biodiversity both through the proposed planting specification and the extensive SuDS measures proposed. Lastly, we draw further attention to the enclosed



Habitats Management Plan and the discussion surrounding site management in Section 4.4 of this Report which refers to the management regime for the community and amenity facilities which will ensure that the proposed open space will continue to provide a biodiversity rich and accessible and inclusive space for the community.

5.10 Ecology

Section 2.5 of this Report sets out the environmental context for the subject lands, as part of this, we note that a *Natura Impact Statement* (NIS) in support of the Appropriate Assessment Process, is enclosed with the planning application.

In respect of relevant Natura 2000 Sites, the proposed works are not located within a Natura 2000 site but there are a number of such sites within 15 km of the subject site. In this regard, the NIS states the following:

“The subject site is located in close proximity to Dublin Bay, situated 2.8 km from both South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA...There is a direct hydrological connection...from the subject site to the aforementioned Natura 2000 sites via the proposed surface water drainage strategy. It is proposed to separate the surface water drainage strategy for the subject site into three catchments: Catchment A, Catchment B1, and Catchment B2. Surface water drainage from Catchment A will join the existing public surface water network via a manhole connection located to the north-west of the site. This network then outfalls to the River Slang. Surface water drainage from Catchment B1 will, after attenuation, outfall to an existing open channel drain that passes through the subject site. Catchment B2 will, after attenuation, outfall to an existing drainage ditch located just outside of the site. As both the River Slang and the aforementioned open channel drain which leads to the Elm Park stream flow into Dublin Bay, there is a direct hydrological connection to Natura 2000 sites located along this pathway.”

The NIS then goes on to conclude:

“No significant effects are likely from the proposed development, either alone or in combination with any other plans or projects on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites.”

Further to this, a full ecological impact assessment of the proposed development is contained within the Biodiversity Chapter of the EIAR (prepared by Altemar Ltd.), including a detailed assessment of the baseline environment (building upon the survey findings referred to in Section 2.5 of this Report), details of the potential impacts arising from the proposed development and measures required to mitigate that impact.

In terms of conclusions, the Biodiversity Chapter considers the loss of certain biodiversity features on site and the introduction of new buildings and increased human disturbance, in the context of the proposed sensitive landscape strategy which includes biodiversity enhancement measures. An extract from the conclusions of the Biodiversity Chapter is provided below:



“Detailed mitigation measures have been outlined and will be carried out during the construction and operational phases of the development including measures to ensure the protection of badgers and bats on site. In conclusion, the proposed development has satisfactorily addressed the potential impacts on biodiversity on site and within the potential zone of influence. It is considered that the overall impact on the biodiversity of the proposed development is a long term neutral residual impact on the existing biodiversity. However, the implementation of the proposed landscaping and Habitat Management Plan will provide significant on-site biodiversity enhancement features and provide long term positive benefits to the biodiversity on site.”

Drawing upon the above, we conclude that the proposed development will not give rise to unacceptable impact upon the environment from a biodiversity perspective in the context of site-specific ecology and from an Appropriate Assessment perspective in the context the identified relevant Natura 2000 sites. As set out in relation to the landscape strategy above, we confirm that the proposed development will give rise to enhancements to local biodiversity through habitat creation, including through the introductive of extensive SuDS to the site.

5.11 Archaeology

The planning application is supported by a full archaeological assessment contained at Chapter 16 ‘Cultural Heritage and Archaeology’ of the EIAR, prepared by IAC. This assessment is supported by detailed archaeological survey work, appended to the EIAR as Appendix 16.1 and 16.2. The survey work consisted of geophysical survey work and test trenching carried out in 2021 and 2024, which revealed 5 no. areas of archaeological significance, comprising two small enclosures dating to the post-medieval era, a kiln, an isolated pit and a cluster of hearths with postholes.

The report recommended that the area of impact should be preserved by record through full archaeological excavation, together with a number of specific mitigation measures, including the preservation of the archaeological features by record (archaeological excavation) prior to the development going ahead. The EIAR chapter concludes that there would be no significant adverse impacts arising from the development in this regard.

5.12 Engineering

The planning application is supported by a full suite of engineering proposals to serve the proposed development, including extensive SuDS proposals which are further detailed in the *Infrastructure Report* prepared by BMCE.

In terms of foul water, the proposed foul drainage system will connect to the Irish Water network at the existing 300mm combined sewer on Dundrum Road. We confirm that Uisce Éireann have confirmed capacity in the receiving network, as reflected in the Confirmation of Feasibility letter, dated 26 March 2024 and appended to the *Infrastructure Report*.

In terms of proposed watermains, the proposed development will be connected to a new public watermain on Dundrum Road. Uisce Éireann also confirmed capacity in this regard, as detailed in the aforementioned Report.

Furthermore, the proposed surface water drainage system is designed to comply with the Greater Dublin Strategic Drainage Study (GSDSDS) and other relevant guidelines and codes of practice. For surface water drainage purposes, it is proposed that the development is split into three catchments. The catchments will be attenuated separately by means of blue roofs and attenuation tanks. The catchments follow approximately the existing site topography and natural drainage routes, as summarised below:

- Catchment A drains into the Slang, via an existing surface water sewer;
- Catchment B & C drain to the open drainage ditch at two locations;

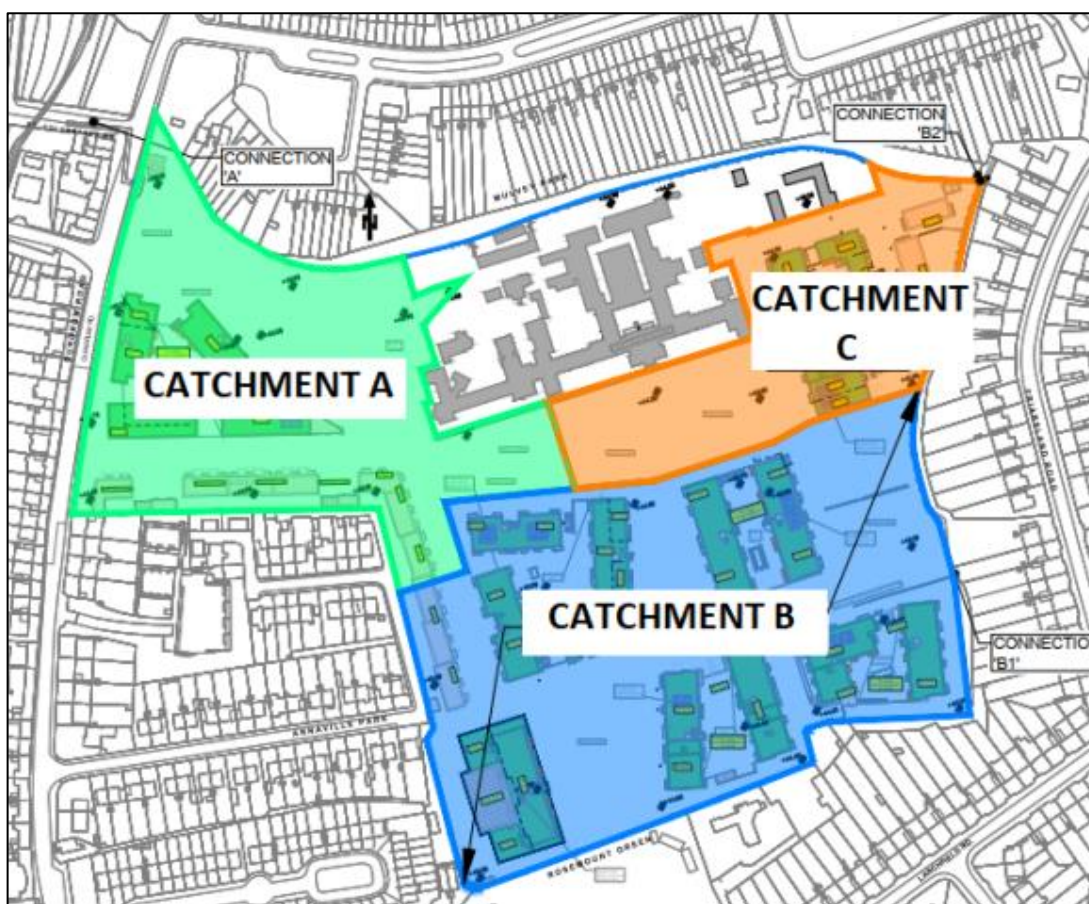


Figure 5.9: Extract from BMCE’s Infrastructure Report showing the proposed catchment Strategy.

As described in the landscape section of this Report, the proposed development includes extensive SuDS proposals which are considered to mitigate flood risk and protect natural water cycle, manage the quality of the runoff to prevent pollution, create and sustain better places for people (amenity) and create and sustain better places for nature (biodiversity). The proposed SuDS measures are considered to deliver significant benefits from a flood risk and sustainability perspective and are described in both the *Infrastructure Report* and the *Landscape Design Report*.



6.0 CONCLUSION

As described in detail above and within the *Statement of Consistency including Dundrum LAP Statement of Consistency*, the proposed residential development is considered compliant with local, regional and national policy and guidance.

Further to the above, we provide some key points below which confirms the proposed development's compliance with the relevant policy and guidance and the proper planning and sustainable development of the surrounding area:

- The proposed Part 10 is underpinned by a site-wide Masterplan which, in line with the requirements of the Development Plan pertaining to Institutional lands and the DLAP pertaining to the former Central Mental Hospital lands, provides for the comprehensive redevelopment of the lands whilst maintaining their open character and delivering significant recreational amenity for the new and existing community.
- The proposed development will deliver 934 no. new residential units and therefore make a significant contribution to the delivery of housing in Dundrum and the wider context on currently underutilised serviced lands. The proposed Part 10 provides a good housing mix, reflective of local needs.
- The proposed development will deliver an 100% social and affordable housing scheme, whereby 19% of the units will be provided as social housing for DLRCC (rather than the standard 10% social housing) and the remaining 81% will be delivered as affordable housing under the *Land Development Agency Act 2021*. From a housing delivery perspective, this is considered to constitute a significant public benefit.
- As such, we maintain that the development will be an inclusive community with shared civic spaces, relevant community services and facilities and housing choices for a diversity of residents.
- Further in line with the Institutional Lands policy requirements, the proposed Part 10 scheme provides c.30% public open space, significantly in excess of the 25% required by the Development Plan. (The Masterplan provides for 28% or 3.2 ha public open space.) The public open space is high quality, accessible and inclusive in nature, maintains the open character of the lands and integrates landscape features such as the Walled Garden and mature trees.
- The proposed development sensitively integrates the existing landscape and built heritage to ensure a compatible relationship that protects the site's special character.
- The proposed connectivity and permeability embedded within the Masterplan proposal, and realised by the proposed Part 10, facilitates the sustainable movement of future and existing residents. The provision of connections into existing residential streets provides a positive contribution to the surrounding area from a placemaking perspective.



- The design of the proposed Part 10, including the transition in building height, gives rise to a sensitive relationship with existing surrounding development and minimises impact from an overlooking, loss of light and microclimate perspective, as demonstrated by the detailed in the Architectural Design Report, Daylight and Sunlight Assessment and Microclimate Assessment.
- The proposed development provides increased residential density and height in line with the local and national guidelines while achieving an excellent overall standard of accommodation for future occupiers.
- The proposed Part 10 is supported by a full environmental assessment which demonstrates details predicted impacts upon the environment and appropriate mitigation measures.
- The enclosed Natura Impact Statement (NIS) concludes that no significant impacts are likely on Natura 2000 sites, alone in combination with other plans and projects based on the implementation of mitigation measures.

We trust that this submission is in order and look forward to written acknowledgement of receipt of this application in due course. Please revert to the undersigned with any queries arising.

Yours sincerely,

Julie Costello
Associate
Tom Phillips + Associates